



2023-2031 Housing Element Update

Draft 2023-2031 Housing Element

prepared by

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1 Introduction

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 6th 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 adopted an optional Agricultural Element as part of the General Plan. The Safety Element was updated concurrently with the 6th 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.

1.3 Organization of the Housing Element

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

- **Chapter 1: Introduction**
- **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 Regional Housing Needs Allocation (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.

1.4 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)

1.5 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 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.

1.6 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 regional housing need called the Regional Housing Needs Allocation (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 6th 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

During the 6th Cycle RHNA, 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%
Total	2,475	100.0%

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.

1.7 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.

1.7.1 Project Website

To facilitate the distribution and gathering of information, a project website dedicated to the Housing Element update was created. The project website provided 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 included an introduction, informational flyers, and frequently asked questions specifically on housing element. That page can be accessed here: <https://www.stancounty.com/planning/pl/general-plan.shtm>. 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.

1.7.2 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 within the 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.

1.7.2 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 regional housing needs allocation (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 site 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.

1.7.3 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

1.7.4 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 were 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.

1.7.5 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 City'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.

1.7.6 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 19th, 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 Site 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 for integrating more housing in existing commercial areas
- Concerns about design and affordability of future housing
- Concerns about specific Site Inventory constraints

1.7.7 Equity Advisory Committee

To gather local expert-level knowledge and input on the Housing Element Update, an Equity Advisory Committee (EAC) will convene with five representatives of local and regional organizations. The

purpose of the equity task force was 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
- Oak Valley Community Bank
- South Modesto Municipal Advisory Council
- Denair Municipal Advisory Council

A virtual EAC meeting is scheduled for early December, 2023. The intent of the meeting is to establish task force expectations, provide introductory information for the general plan and housing element, and discuss housing policies.

1.8 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. 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.

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- Clarified that existing regulations regarding manufactured home installation are consistent with State law.
- 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,

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 including age groups 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

During 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.

Conclusions

In looking at the County as a whole, 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 of children age 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 increase within the healthcare sector and other jobs that contribute to the overall economy in Stanislaus County is shown in Table 2-8. 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 include jobs in public services and educational services.

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

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 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

Conclusions

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 11.19 percent of the units. Between 2010 and 2020, there was a slight decrease in overall housing units (-0.60 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 to build 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 of 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

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, code enforcement 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 9 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 26.1 percent versus 21.1 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 low-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 County and City. 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 a 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)

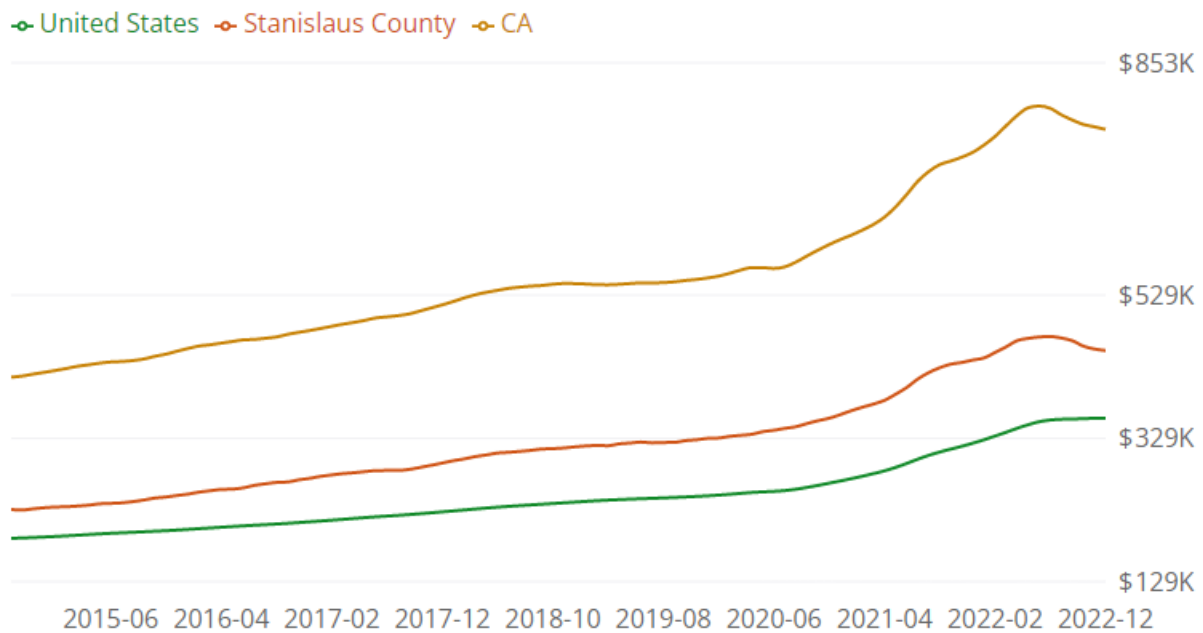
Bedrooms in Unit	Stanislaus County 2022	Stanislaus County 2021
1 Bedroom	\$1,001	\$987
2 Bedrooms	\$1,250	\$1,224
3 Bedrooms	\$1,761	\$1,733
4 Bedrooms	\$2,063	\$2,033

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 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 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)

Median Sales Price	
Location	
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.

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 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 Fair Market Rent (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 ZHMVI 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 needs 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 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 low-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 article², 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 are the predominate occupancy in the larger agricultural sector and their primary incomes are earned through permanent or seasonal agricultural labor. Due to the seasonal nature of agricultural labor and limited income, farmworkers tend to have difficulty in securing safe and decent 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. As discussed in the Employment section, this group also receives the lowest average annual salary in the region.

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

² Housing for Seniors: Challenges and Solutions, Summer 2017.
<https://www.huduser.gov/portal/periodicals/em/summer17/highlight1.html>

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

The seasonality of farm work, lack of stable 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,³ 6,429 farmworkers were seasonal in Stanislaus County, 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. The Stanislaus County 2022 Affordable Housing Needs report⁴ 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

³ Census of Agriculture County Profile: Stanislaus County California, 2017.

https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/California/cp06099.pdf

⁴ Mazzella, Danielle(Agency?). Stanislaus County Housing Needs Report, May 2022. <https://chpc.net/resources/stanislaus-county-housing-need-report-2022/>

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.

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:

- 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 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)⁵, in 2022⁶, 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.

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

⁵ 2021 Stanislaus Regional Homeless Strategic Plan. <https://www.stancounty.com/bos/agenda/2022/20220712/Dis03.pdf>

⁶ 2022 Stanislaus County Homeless Point-In-Time Count. <https://www.stancounty.com/newsfeed/pdf/20220613-resch-pit.pdf>

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 provide 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. 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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3 Affirmatively Furthering Fair Housing

California Government Code Section 8899.50 requires local agencies to affirmatively further fair housing (AFFH). Under California law, AFFH means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” Government Code Section 8899.50 stipulates that an assessment of fair housing (AFH) includes the following components:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and fair housing outreach capacity.
- An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk.
- An assessment of the contributing factors for the fair housing issues identified under Government Code Section 65583 (10)(A)(ii).
- An identification of Other Relevant Factors, including historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.
- An identification of the jurisdiction’s fair housing priorities and goals, giving highest priority to those factors identified in Government Code Section 65583 (10)(A)(iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance, and identifying the metrics and milestones for determining what fair housing results will be achieved.
- Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies, and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement.

A fair housing issue is a condition in a geographic area of analysis that restricts fair housing choice, or access to opportunity. These conditions are ongoing at the local and regional level and include segregation or lack of integration, racially or ethnically concentrated areas of poverty and affluence, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing. Understanding these conditions at the local and regional level is essential to informing and prioritizing contributing factors to fair housing issues.

3.1 Local Analysis

Stanislaus County is in the northern portion of the San Joaquin Valley region, bounded by San Joaquin County to the northeast and Merced County to the southwest. Unincorporated Stanislaus County is comprised of 23 census designated places (CDPs) geographically identified by the US Census Bureau. A CDP is a statistical equivalent of incorporated places and can include unincorporated communities,

university towns, and resort towns, among other unincorporated communities that do not have a legally defined boundary, or active functioning governmental structure. This AFH does not include the incorporated cities of the county and refers to the CDPs to analyze patterns of AFH-related issues. The CDPs in Stanislaus County and their populations are shown in Table 3-1. A map of the incorporated cities and CDPs in Stanislaus County is provided in Figure 3-1.

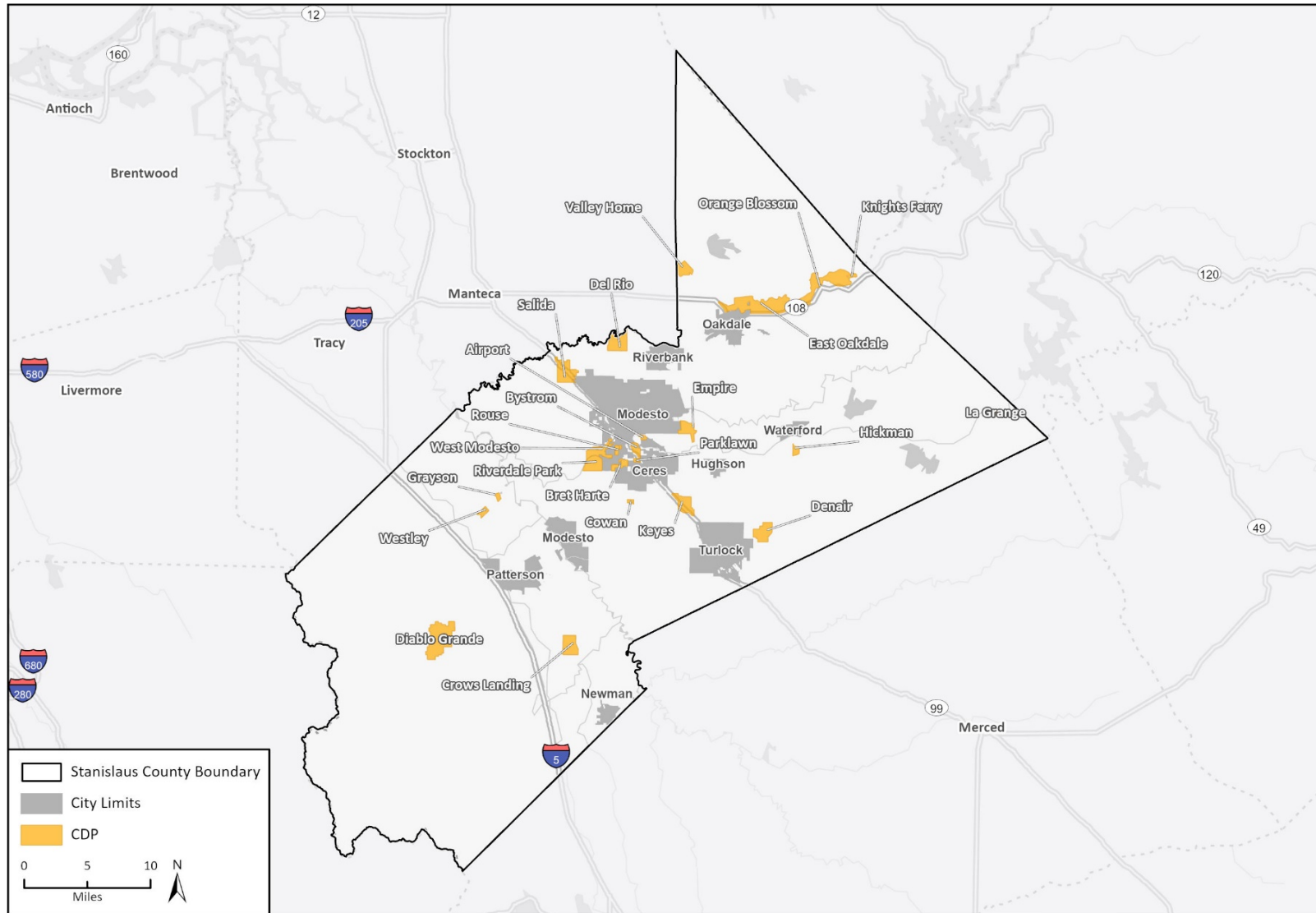
Table 3-1 Census-Designated Places in Stanislaus County

CDP	Population
Airport	1,389
Bret Harte*	5,135
Bystrom*	3,957
Cowan	342
Crows Landing	322
Del Rio	1,399
Denair	4,865
Diablo Grande	1,669
East Oakdale	3,201
Empire	4,202
Grayson	1,041
Hickman	604
Keyes	5,672
Knights Ferry	112
La Grange	166
Orange Blossom	1,068
Parklawn*	1,249
Riverdale Park*	1,053
Rouse*	1,913
Salida	13,886
Valley Home	284
Westley	575
West Modesto	5,965
Total Population of CDPs	60,069

* These CDPs are located between the City of Modesto and the City of Ceres and are collectively referred to as "South Modesto."

Source: ACS 2020 Decennial Census, P1

Figure 3-1 Stanislaus County Cities and CDPs



Basemap provided by Esri and its licensors, 2022.
Additional data provided by the U.S. Census Bureau, 2021

21_12095_HE_AFFH
Fig 1 Stanislaus County Cities and CDP

3.2 Regional Analysis

The Public Policy Institute of California (PPIC) is a nonpartisan organization dedicated to informing and improving public policy in California. In 2004, the PPIC published a policy report analyzing migration trends to, from, and within the Central Valley and the implications of those trends. This policy paper, *The Central Valley at a Crossroads: Migration and its Implications*¹, identifies factors that drive migration, including economic, educational, and social factors. These factors differ dramatically throughout the Central Valley; therefore, the policy paper identifies four subregions of the valley: Upper Sacramento Valley, Sacramento Metro, Northern San Joaquin Valley, and Southern San Joaquin Valley. These four subregions are shown on the inset map of California in Figure 3-2. This AFH analysis compares Stanislaus County to the broader Northern San Joaquin Valley Subregion comprised of San Joaquin, Stanislaus, and Merced Counties, shown in Figure 3-2.

The settlement patterns described in *The Central Valley at a Crossroads: Migration and its Implications* provide insight on the level of access to opportunity and fair housing based on the following factors: race and ethnicity, education level, age, economics, and other social indicators specific to the subregion. Research from this paper is supported by U.S. Census data, regression modelling, interviews with community leaders, and published research.

The PPIC report concluded that residents in the North San Joaquin Valley subregion have access to jobs in the Bay Area and cheaper housing in the Valley, whereas residents in Southern San Joaquin Valley subregion (Madera, Fresno, Tulare, Kings, and Kern Counties) do not have access to jobs in the Bay Area and rely on agriculture as the primary economic industry, with nearly 17 percent of its residents working within the industry. Access to educational opportunity is also more prevalent in the Northern San Joaquin Valley as opposed to the Southern San Joaquin Valley; however, the Northern San Joaquin Valley experiences longer commute times, traffic congestion, and poor air quality.

3.3 Fair Housing Methodology

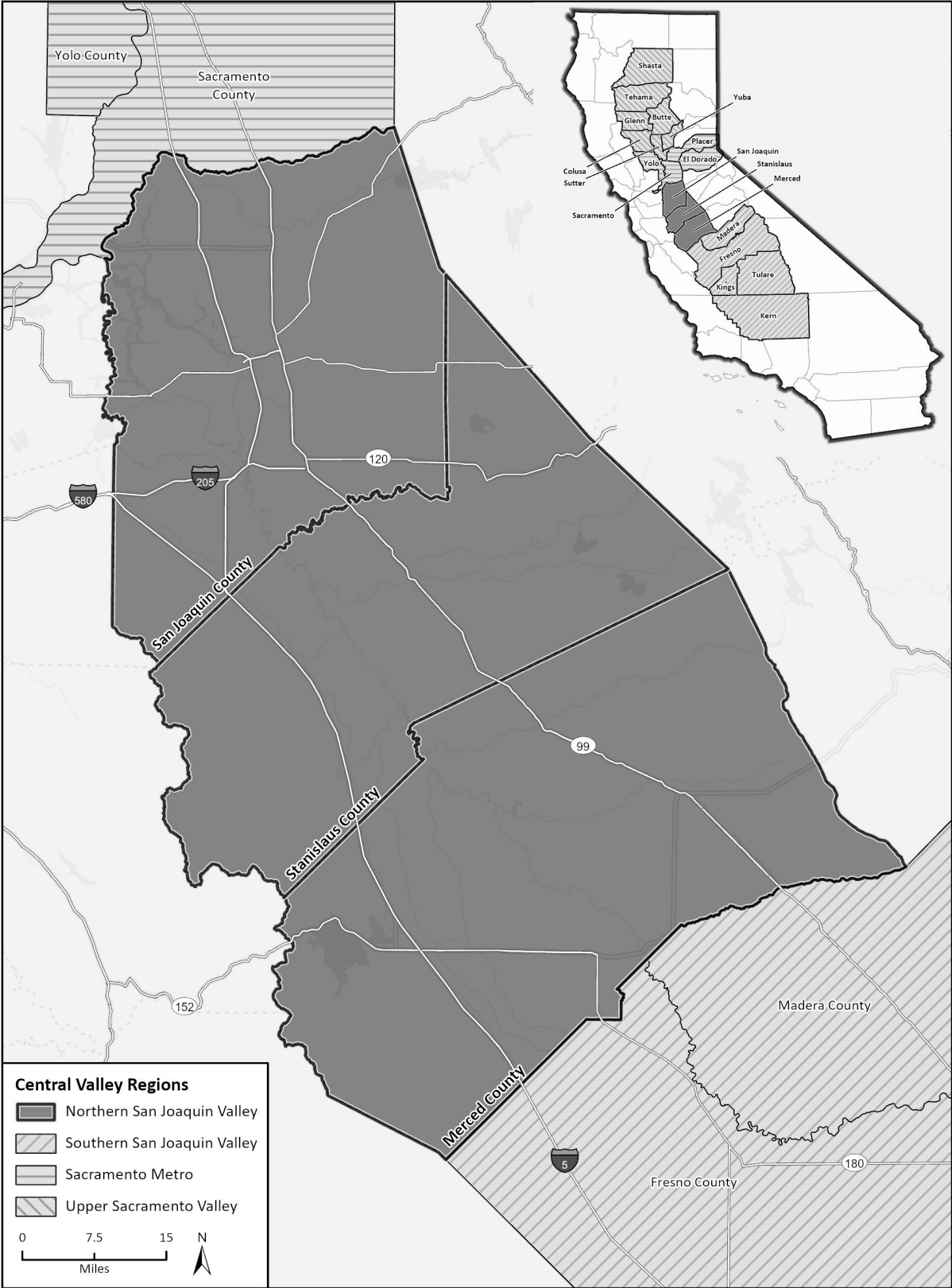
This assessment has been prepared consistent with the California Department of Housing and Community Development (HCD) Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance Memo) which provides guidance on the preparation of housing elements and ensures statutory requirements are satisfied, pursuant to Government Code Section 65583(c)(10).

3.3.1 Data Sources

To conduct this analysis, the County utilized data from a variety of sources, described in the sections below.

¹ Hayes, Joseph and Hans Johnson. *The Central Valley at a Crossroads: Migration and its Implications*. Public Policy Institute of California. https://www.ppic.org/wp-content/uploads/content/pubs/report/R_1104HJR.pdf

Figure 3-2 Northern San Joaquin Valley Region



Basemap provided by Esri and its licensors, 2023

HE_AFFH
Fig X Regional Location

Housing and Community Development's AFFH Data Viewer

The AFFH Data Viewer is a tool developed by HCD that features census block group and tract-level data from an expansive collection of sources including American Community Survey (ACS), United States Department of Housing and Urban Development (HUD), Tax Credit Allocation Committee (TCAC), Urban Displacement Project (UDP), and Comprehensive Housing Affordability Strategy (CHAS). The Data Viewer tool serves as a resource for local and regional governments and provides the ability to explore spatial data patterns concerning fair housing enforcement, segregation and integration, racially and ethnically concentrated areas of poverty, and disparities in access to opportunities and housing. The Data Viewer is intended to assist in the creation of policies that alleviate disparities, combat discrimination, and increase access to safe and affordable homes.

Urban Displacement Project (UDP)

The UDP tracks neighborhood changes and identifies areas that are vulnerable to gentrification and displacement in California. Indicators of gentrification and displacement are measured at the census tract level based on data from the 2015-2019 ACS data. The UDP estimates displacement risk through a predictive model that identifies census tract-level characteristics correlated with a high likelihood of low-income population loss.

CalEnviroScreen

The California Office of Environmental Health Hazard Assessment developed a screening methodology to identify communities disproportionately burdened by multiple sources of pollution. This tool, called the California Communities Environmental Health Screening Tool (CalEnviroScreen), utilizes existing environmental, health, and socioeconomic data to rank census tracts based on 20 distinct indicators. In general, if a census tract has a high score for that indicator, it is more impacted by pollution burdens and population vulnerabilities compared to other census tracts. Designated disadvantaged communities are those with CalEnviroScreen percentile scores of 75 or higher, meaning that they scored within the highest 25 percent of census tracts across California.

California Tax Credit Allocation Committee (TCAC)

To assist fair housing analysis, HCD and TCAC created the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies and departments to further the state's fair housing goals.² The California Fair Housing Task Force created Opportunity Maps to identify resource levels across the state to accompany new policies aimed at increasing access to high-opportunity areas for families with children.³ Opportunity Maps are comprised of composite index scores, including education, economic, and environmental. The higher composite scores mean more access to resources that offer residents a better chance at economic advancement, positive educational outcomes, and better physical and mental health. For a detailed analysis of each of these factors, see 3.11.2 Opportunity Areas by Indicator.

² Office of The State Treasurer (STO). 2021. <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>

³ California Fair Housing Task Force 2022 Opportunity Maps. <https://belonging.berkeley.edu/2022-tcac-opportunity-map>

AllTransit

AllTransit is a tool that examines access to transit. The website uses metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The AllTransit performance score explores metrics that reveal the social and economic impact of transit, such as connectivity, access to jobs, and frequency of service.

Comprehensive Housing Report for the San Joaquin Valley

In response to housing supply and affordability challenges, the San Joaquin Valley Regional Early Action Planning (REAP) Committee commissioned a study of housing trends, impediments, and best practices in the San Joaquin Valley. Funded by the REAP grant program, and with the coordination of HCD staff, the 2022 study was conducted through outreach to the eight counties in the San Joaquin Valley, stakeholders, City and County staff, metropolitan planning organization staff, and the public. Interviews with builders, developers, housing advocates, and staff supported an analysis of barriers to housing affordability and production in the San Joaquin Valley.

The study concluded that while the region has become more diverse in the past few decades, there are disparities in income, poverty, and homeownership among racial and ethnic groups. Stakeholder interviews provided insight into trends and challenges in housing affordability, and also provided a list of opportunity areas for affordable housing. This input is discussed in Section, 3.13.2.

Stanislaus County Analysis of Impediments to Fair Housing

The Analysis of Impediments to Fair Housing Choice (AI) was prepared in 2020⁴ to fulfill federal fair housing planning requirements. The AI provides a demographic profile of Stanislaus County, both incorporated and unincorporated, to assess the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents. The AI addresses disparities in housing needs, existing patterns of segregation and racially/ethnically concentrated areas of poverty (R/ECAPs) and contributing factors to fair housing impediments.

The AI identified the following impediments to fair housing in Stanislaus County:

- There is currently a low supply of affordable housing and financial limitations on new housing developments (such as development fees), with long waitlists for existing affordable housing units. There is a particular shortage of housing for farmworkers and students.
- Prices of for-sale housing (single-family homes and condominiums) have increased steadily in Stanislaus County since 2012. The highest values are in the City of Oakdale, with a typical housing unit worth \$368,000 in 2019. The lowest value for a typical house in 2019 is in the City of Waterford, worth about \$270,000.
- Stanislaus County is projected to grow by approximately 800,000 residents, a 37 percent increase, over the next 40 years. The County has become more diverse in terms of race and ethnicity over the past 30 years, reflected in Census data about geographic residence patterns and primary language spoken at home.
- Housing affordability concerns are affected by low wages, experienced on average at a higher rate by seniors on fixed incomes, those with at least one disability, and certain racial and ethnic groups.

⁴ Stanislaus County, 2020. "Stanislaus County Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice." <https://www.stancounty.com/planning/cdbg/documents/other/2020-2025-analysis-impediments-final.pdf>

- Internet access is disproportionately limited for lower-income people.
- Disability remains the highest reported category for fair housing discrimination in the county.

Stanislaus County Disadvantaged Unincorporated Communities Report

The Stanislaus County Disadvantaged Unincorporated Communities Report is an appendix to the County's General Plan Land Use Element. Disadvantaged Unincorporated Communities are defined by Senate Bill 244 (2011) as unincorporated areas with an annual median household income that is less than 80 percent of the statewide median household income. The report details the existing conditions of each disadvantaged community and what needs they may have. The communities of Cowan Tract, Crows Landing, Grayson, Keyes, Monterey Park Tract, Riverdale Park Tract, and Westley are all discussed in detail in the report. Healthy community strategies are offered to improve conditions in these communities.

Community Engagement

To gather input from community members for the housing element update, Stanislaus County hosted two community workshops. The first workshop asked participants questions regarding fair housing issues in the county. The second workshop presented the draft sites inventory where participants were encouraged to comment on identified sites. The County conducted stakeholder interviews with service providers, community-based organizations, and housing developers. The County also conducted an online community-wide survey to identify housing issues and priorities.

For a more detailed discussion of community engagement, see Section 3.143.13.2.

3.4 Fair Housing Resources

3.4.1 Enforcement and Outreach Capacity

Fair housing enforcement and outreach capacity relates to the ability of a local jurisdiction and fair housing entities to disseminate information related to fair housing and provide outreach and education to assure community members are informed of fair housing laws and tenants' rights. In addition, enforcement and outreach capacity includes the ability to address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing.

Pursuant to the California Fair Employment and Housing Act (Government Code Section 12921 (a)), the opportunity to seek, obtain, and hold housing cannot be determined by an individual's "race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, genetic information, or any other basis prohibited by Section 51 of the Civil Code."

Fair housing issues that may arise in any jurisdiction include but are not limited to:

- Housing design that makes a dwelling unit inaccessible to an individual with a disability.
- Discrimination against an individual based on race, national origin, familial status, disability, religion, sex, or other characteristic when renting or selling a housing unit.
- Disproportionate housing needs including cost burden, overcrowding, substandard housing, and risk of displacement.

In Stanislaus County, 11 stakeholders from various local housing developers, agencies, and housing and community health advocates identified some fair housing issues. As discussed further in Section 3.14.2, Stakeholder Interviews, these stakeholders reported instances of housing discrimination towards undocumented persons, persons with disabilities, non-native English speakers, large households, and those with past experiences in the criminal justice system. While some comments were specific to unincorporated county areas, other comments were reflective of countywide conditions. Residents reported that landlords have refused to rent to these groups, charge higher rent, retaliate against or evict residents who complain about housing conditions, and reject applicants that appear to be low-income or involved in criminal activity. During community outreach, one stakeholder provided the opinion that more community outreach could help residents better understand their rights under fair housing law.

Fair Housing Resources

Table 3-2 shows organizations in Stanislaus County that conduct fair housing assistance outreach and related programs. These organizations collaborate with the County and other local governments to address housing and community needs and provide the following services:

- Fair housing testing and complaints
- Fair housing counseling and education
- Tenant/landlord counseling and mediation
- Homeless prevention program
- Rental assistance program
- Rent/deposit grant program
- Home seeking services
- Shared housing counseling placement
- Homebuyers' education learning program

The County partners with Project Sentinel, a non-profit organization, to provide fair housing services and conduct fair housing testing. Project Sentinel assists residents facing housing discrimination, mortgage foreclosure & delinquency, rental issues including repairs, deposits, privacy, dispute resolution, home buyer education, post purchase education and reverse mortgages.

Table 3-2 Fair Housing Organizations Active in Stanislaus County

Organization	URL	Phone Number
California Rual Legal Assistance, Inc.	https://crla.org/programs/fair-housing	(209) 577-3811
Center for Human Services	https://www.centerforhumanservices.org/	(209) 526-1476
Community Housing and Shelter Services	https://www.communityhousingandshelterservices.org/	(209) 527-0444
Project Sentinel	https://www.housing.org/	(209) 236-1577
Senior Advocacy Network	http://senioradvocacynetwork.org/	(209) 577-3814
Stanislaus Regional Housing Authority	https://stanregionalha.org/	(209) 557-2000
We Care Turlock	https://wecareturlock.org/	(209) 664-2003

3.4.2 Ability to Address Complaints

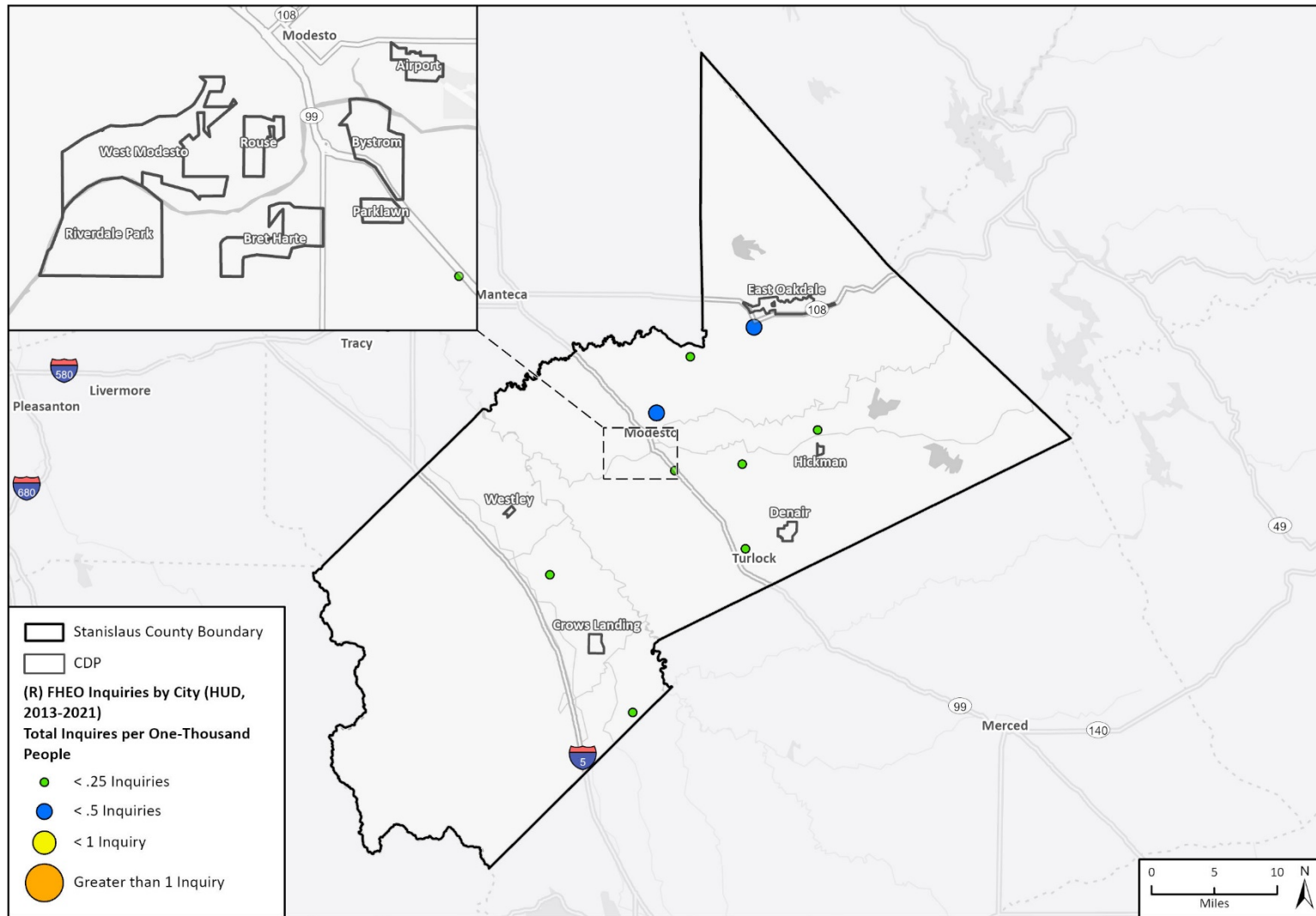
Initiated by the Department of Justice’s Civil Rights Division in 1991, fair housing testing is a technique used to uncover evidence of discrimination in rental housing. Fair housing testing involves one or more individuals without any bona fide intent to rent or purchase housing, who pose as prospective renters for the purpose of determining whether a landlord is complying with local, state, and federal fair housing laws. Enforcement actions may be taken when investigations yield evidence of a pattern or practice of illegal housing discrimination. Testing may be initiated following the filing of a specific housing discrimination complaint or, as is the case when testing for disability discrimination, as part of an overall effort to determine whether the design or architectural features of a specific rental facility comply with state and federal accessibility requirements. Testing in Stanislaus County is used to prohibit discrimination based on race, color, religion, national origin, sex, disability, and familial status.

The County refers discrimination complaints to the California Department of Fair Employment and Housing. The California Department of Fair Employment and Housing dual-files fair housing cases with HUD’s Region IX Office of Fair Housing and Equal Opportunity (FHEO). HUD’s FHEO reported three housing discrimination cases were filed by residents of Stanislaus County in 2020, all regarding disability bias.

Between 2013 and 2021, 10 FHEO inquiries were received in Stanislaus County. While these inquiries were not pursued by the residents and are not considered official cases, they identify concerns about possible discrimination. As shown in Figure 3-3, less than 0.5 inquiries have been made per one thousand people in Stanislaus County. Oakdale and North Modesto are the two areas within the County where inquiries are more common.

Project Sentinel has historically collaborated with Stanislaus County and other local governments to address housing and community needs. Project Sentinel currently provides information, referrals, and education to community members, housing providers, and tenants about fair housing laws, and investigates complaints and advocates for those who have experienced housing discrimination.

Figure 3-3 FHEO Inquiries in Stanislaus County by City, 2013-2021



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

HE_AFFH
AFFH - County

Source: AFFH Data Viewer

3.5 Segregation and Integration Patterns and Trends

Government Code Section 65583 (10)(A)(ii) requires cities and counties to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

To inform priorities, policies, and actions, the housing element must include an analysis of integration and segregation, including patterns and trends. Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability in a specific geographic area. Segregation generally means the opposite condition, where concentrations of the characteristics described above are high in a specific geographic area. To adequately assess the patterns of integration and segregation, this section identifies trends at the regional scale (Northern San Joaquin Valley) and at the local scale (unincorporated Stanislaus County). To identify socio-economic and demographic spatial trends across these jurisdictions, this analysis utilizes HCD's AFFH Data Viewer, which provides an expansive collection of data from sources including the 2015-2019 ACS, HCD, HUD, UDP, the Center for Disease Control and Prevention (CDC), and other regional and federal agencies. In its AFFH guidance document published in April 2021, HCD describes the importance of segregation and integration analysis in relation to fair housing:

Residential segregation and exclusion, whether by race, ethnicity, disability, or income, is a result of numerous housing policies, practices, and procedures—both public and private—that have had enduring and pervasive negative impacts. Overt and covert housing discrimination through land use policy, shifting housing markets, and patterns of investment and disinvestment, have restricted meaningful fair housing choice and equitable access to opportunity, particularly for communities of color.

Historic patterns of segregation persist in California despite the long-standing federal mandate, established by the Fair Housing Act of 1968 (FHA), that federal agencies and federal grantees affirmatively further the purposes of the FHA. Past and present discriminatory policies and practices, including long-term disinvestment, have resulted in neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems.

In addition, governmental policies have subsidized the development of segregated, high-resourced suburbs in metropolitan areas by constructing new highway systems—often through lower income communities of color — to ensure access to job opportunities in urban centers. This physical and policy infrastructure supports patterns of discrimination and high levels of segregation that continue to persist in California and across the country. All of these conditions persist despite the over 50-year-old obligation to prohibit discrimination and affirmatively further fair housing.⁵

⁵ California Department of Housing and Community Development. 2021. AFFH Guidance Memo. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf, accessed August 2023

3.6 Race and Ethnicity

Examining the demographic, ethnic, and racial composition of a region is vital to understanding fair housing concerns including access to economic opportunity and safe and affordable housing. Historic exclusionary governmental policies, biased mortgage lending practices, and other tactics have caused racial and ethnic segregation and spatial inequities. This section provides an overview of racial/ethnic composition and segregation patterns within the unincorporated areas of Stanislaus County and the region.

Local Trends

There are few areas of concentrated population by race/ethnicity in Stanislaus County. In 2020, non-white residents comprised more than 60 percent of the county's population.⁶ In comparing the percent of total non-white population between 2010-2018 (shown in Figure 3-4 and Figure 3-5), the overall population of non-white residents in the county has increased in the last decade. The distribution of white and Hispanic majority census tracts is nearly split along Highway 99. The predominantly white population of the county is located east of Highway 99, specifically in the northeastern areas of the county such as East Oakdale and Hickman (Figure 3-6). In contrast, the county's predominantly Hispanic population live west of Highway 99 and are more densely located in the CDPs in South Modesto (Figure 3-7).

HUD utilizes the racial/ethnic dissimilarity index as a measure of segregation. The racial/ethnic dissimilarity index represents the extent of which any two racial/ethnic groups differ across a defined geographical area. The index ranges from 0-100, where 0 represents perfect integration between the two racial/ethnic groups and 100 representing perfect segregation. An index value below 40 is generally considered low segregation, a value between 40 and 54 is considered a moderate level of segregation, and a value above 55 is a high level of segregation.⁷ Racial/ethnic segregation in Stanislaus County increased among all measured racial/ethnic groups between 2010 and 2020 (Table 3-3). Segregation is highest between Black and white residents and between Asian/Pacific Islander and white residents. These groups are considered moderately segregated, with index scores between 40 and 54. Segregation between Hispanic and white residents and between all non-white and white residents is low, with index scores below 40.

Table 3-3 Racial/Ethnic Dissimilarity Trends in Stanislaus County

Race/Ethnicity	1990	2000	2010	2020
Non-White/White	29.26	29.80	32.25	34.47
Black/White	44.87	42.76	42.78	49.11
Hispanic/White	29.33	31.32	32.69	34.47
Asian or Pacific Islander/White	39.17	33.74	38.32	46.31

Source: HUD. 2023. Affirmatively Furthering Fair Housing Data and Mapping Tool version AFFHT0006

According to the University of California, Berkeley's Othering and Belonging Institute, people of color (POC) are highly segregated in several census tracts within and surrounding the southern part of the City of Modesto and the City of Ceres (Figure 3-8). White residents are highly segregated in the northeastern part of the county. The cities of Modesto and Turlock and rural areas in central and

⁶ "Non-white" population is calculated by subtracting the total white population from the reported population.

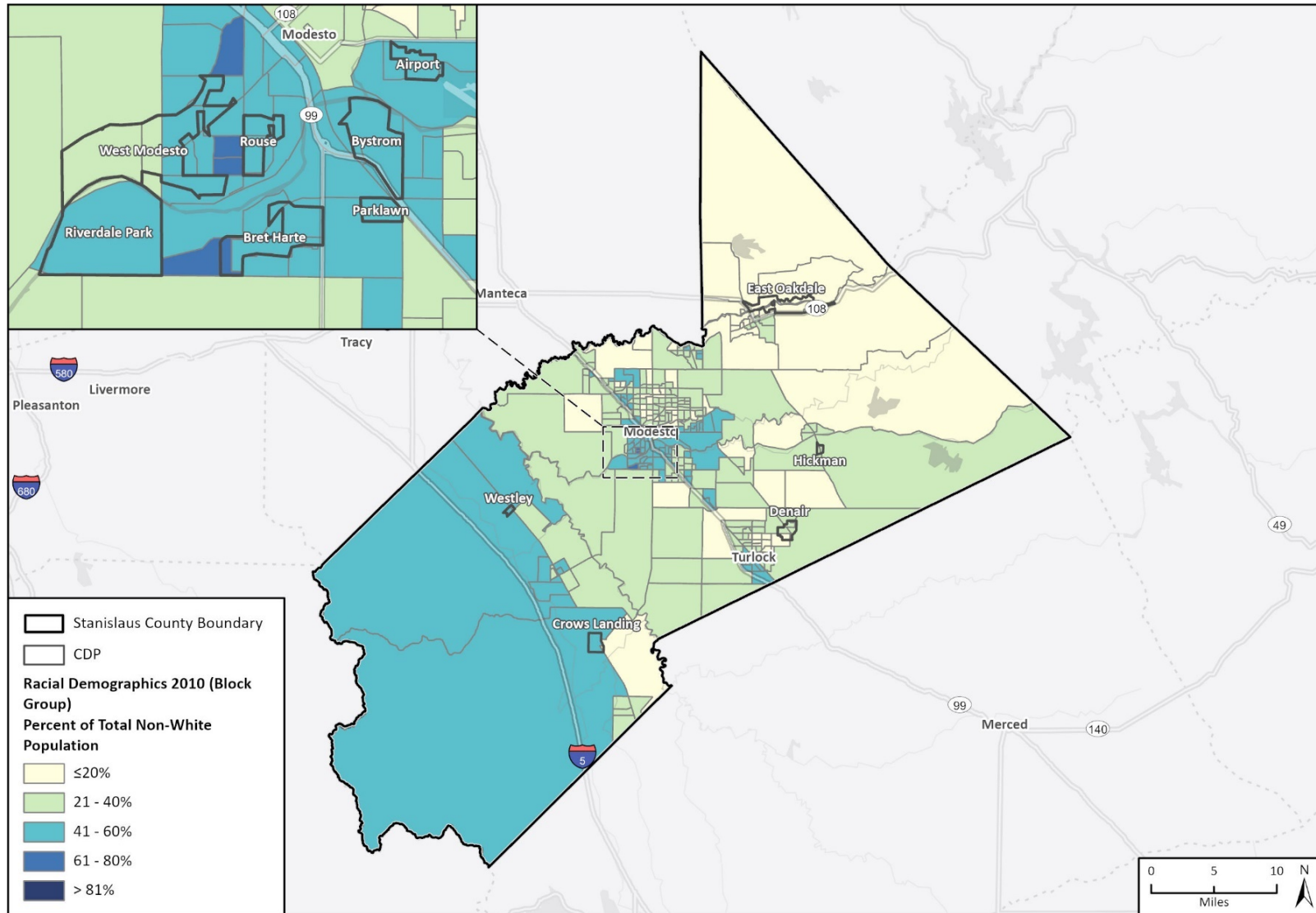
⁷ HUD, 2020. <https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>

western parts of the county have a mix of low to medium segregation areas and well-integrated areas. While most of the unincorporated county is well-integrated or has low to medium levels of segregation, areas with most of the high POC segregation are located in unincorporated parts of the county just outside the city of Modesto. Regional Comparison

Stanislaus County is similar to the other counties in the Northern San Joaquin Valley in terms of racial/ethnic composition. Within each county, the areas with the highest percentage of non-white residents (greater than 81 percent) are located near major cities and along major highways, as shown in Figure 3-9.

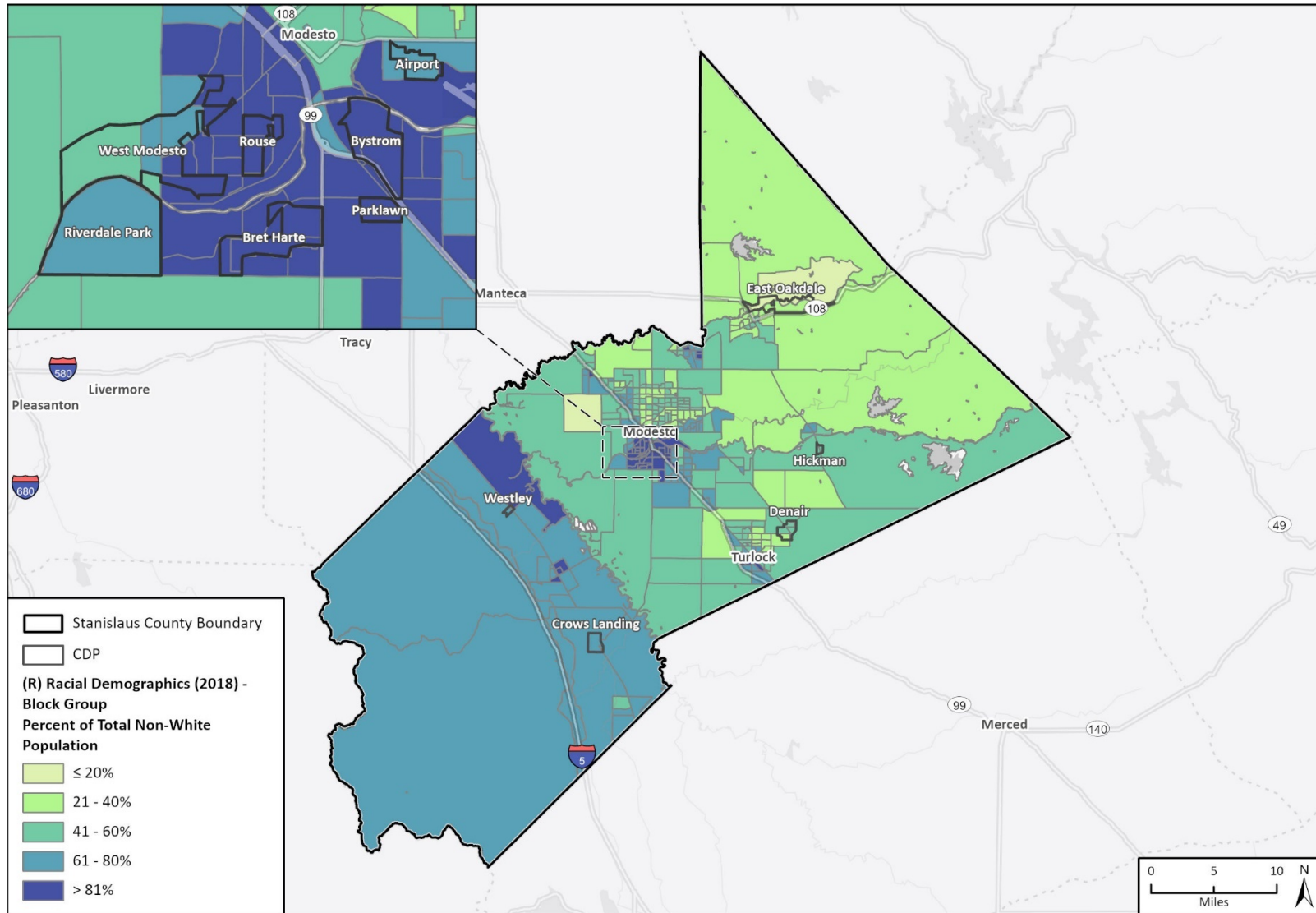
Patterns of racial/ethnic segregation and integration are similar in Stanislaus County and other counties in the Northern San Joaquin Valley (Figure 3-10). All three counties in the Northern San Joaquin Valley have a mix of low to medium segregation areas, well-integrated areas, and areas of white segregation. Well-integrated areas are generally located in the central parts of each county, within and adjacent to urban areas, while areas with high white segregation are in rural, western parts of each county. Areas with high POC segregation are generally located in urban areas, particularly in the cities of Stockton, Lodi, and Modesto.

Figure 3-4 Percent of Total Non-White Population in 2010 by Block Group, Stanislaus County



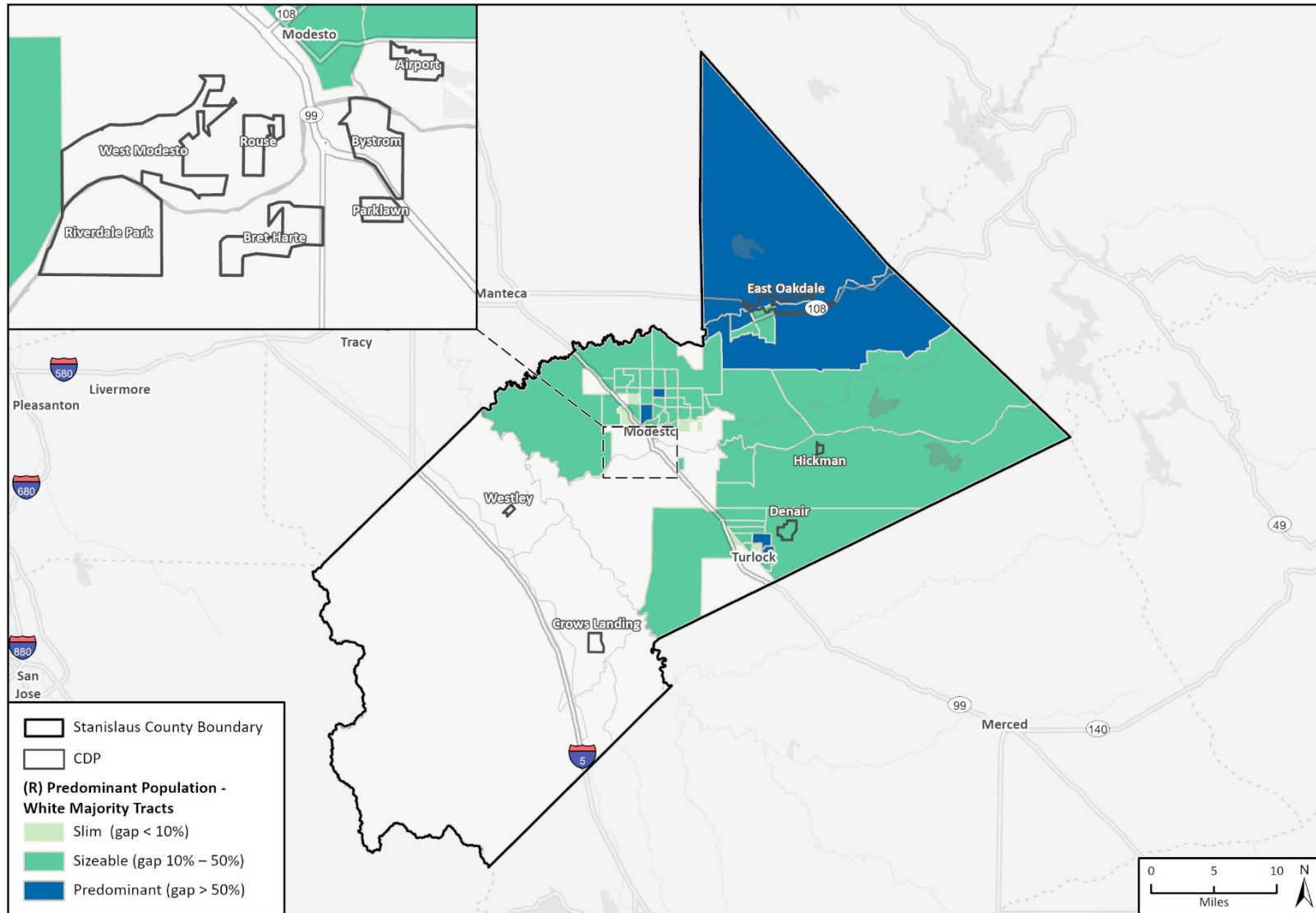
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-5 Percent of Total Non-White Population in 2018 by Block Group, Stanislaus County



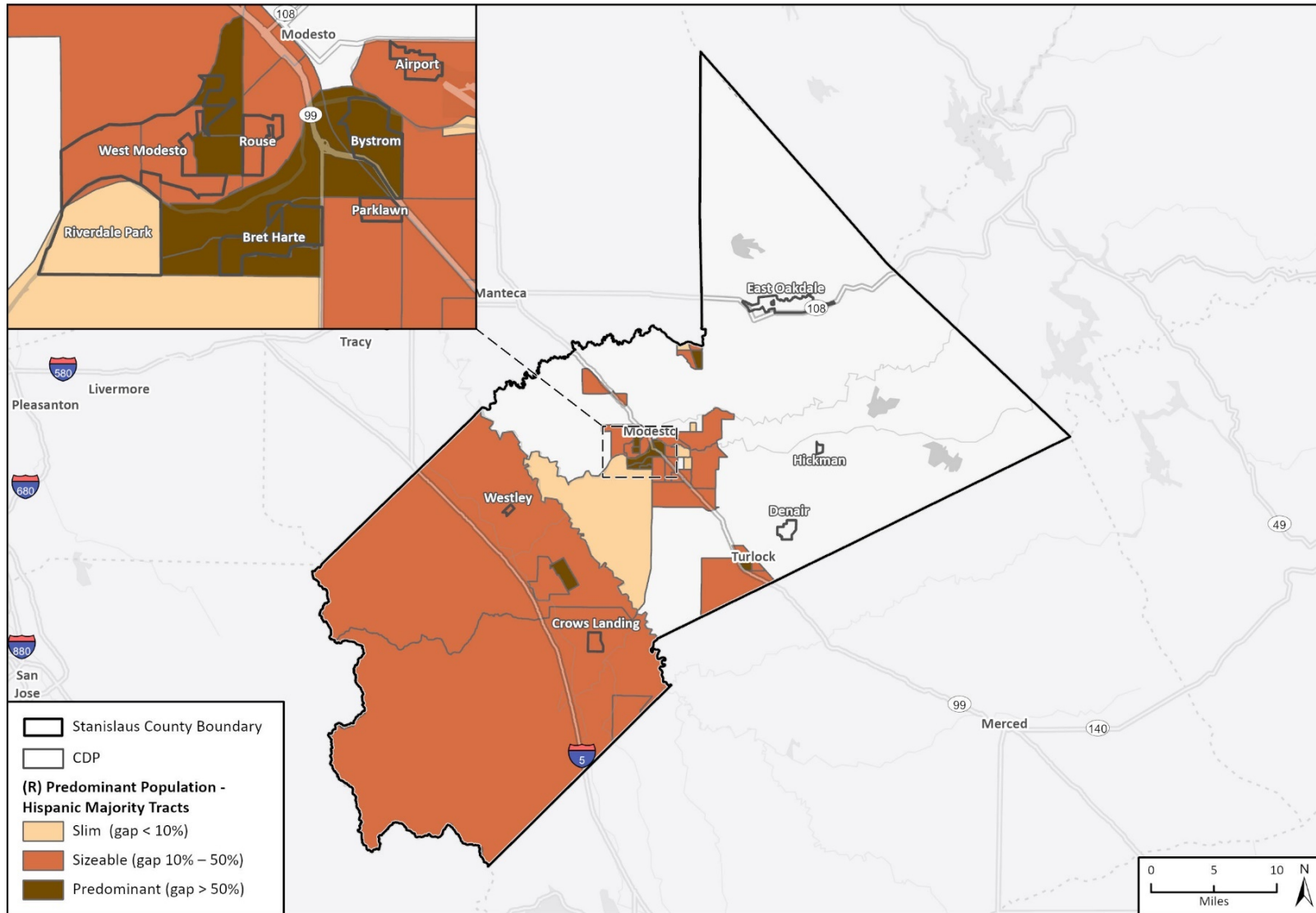
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-6 2018 White Majority Tracts, Stanislaus County



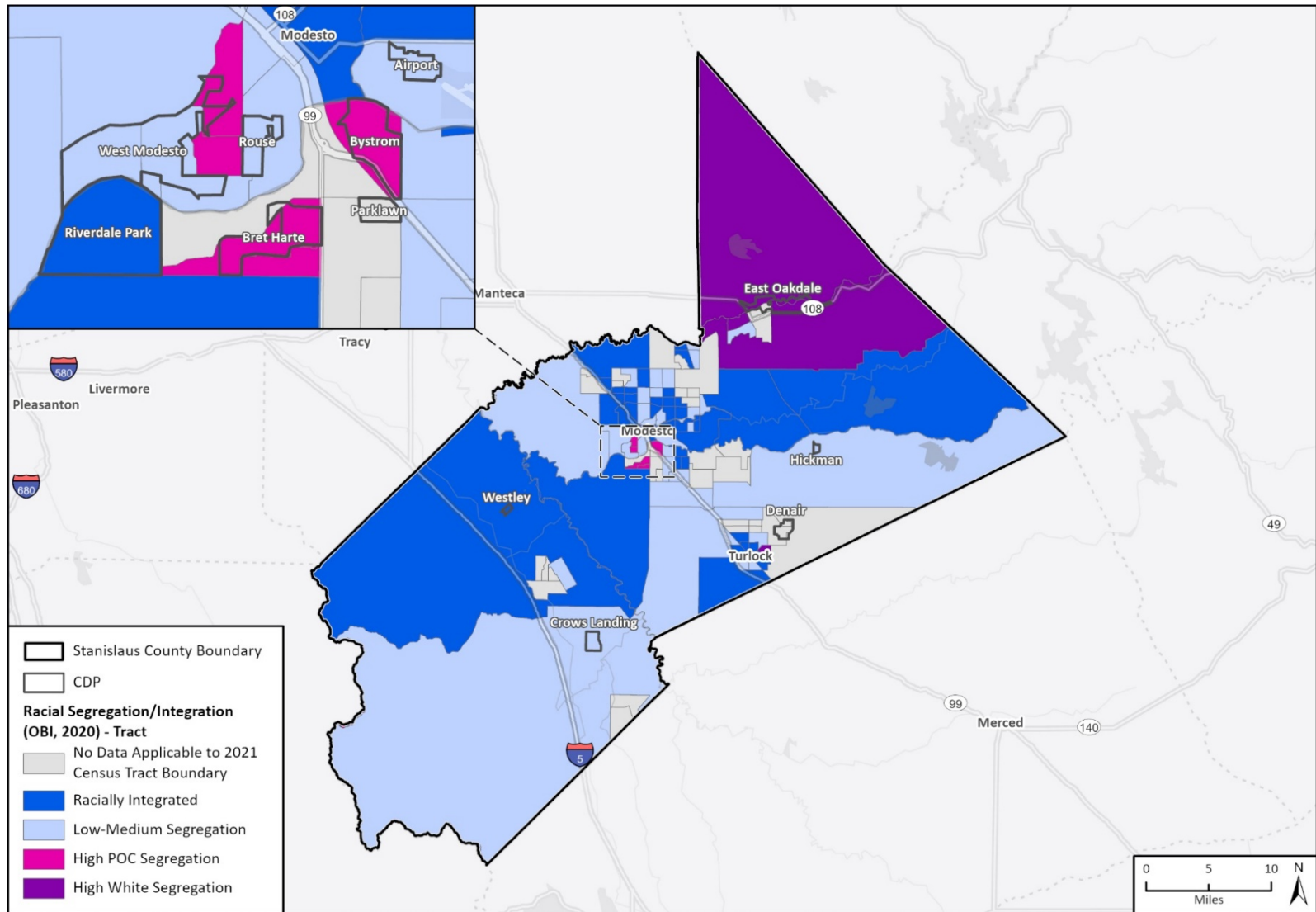
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

Figure 3-7 2018 Hispanic Majority Tracts, Stanislaus County



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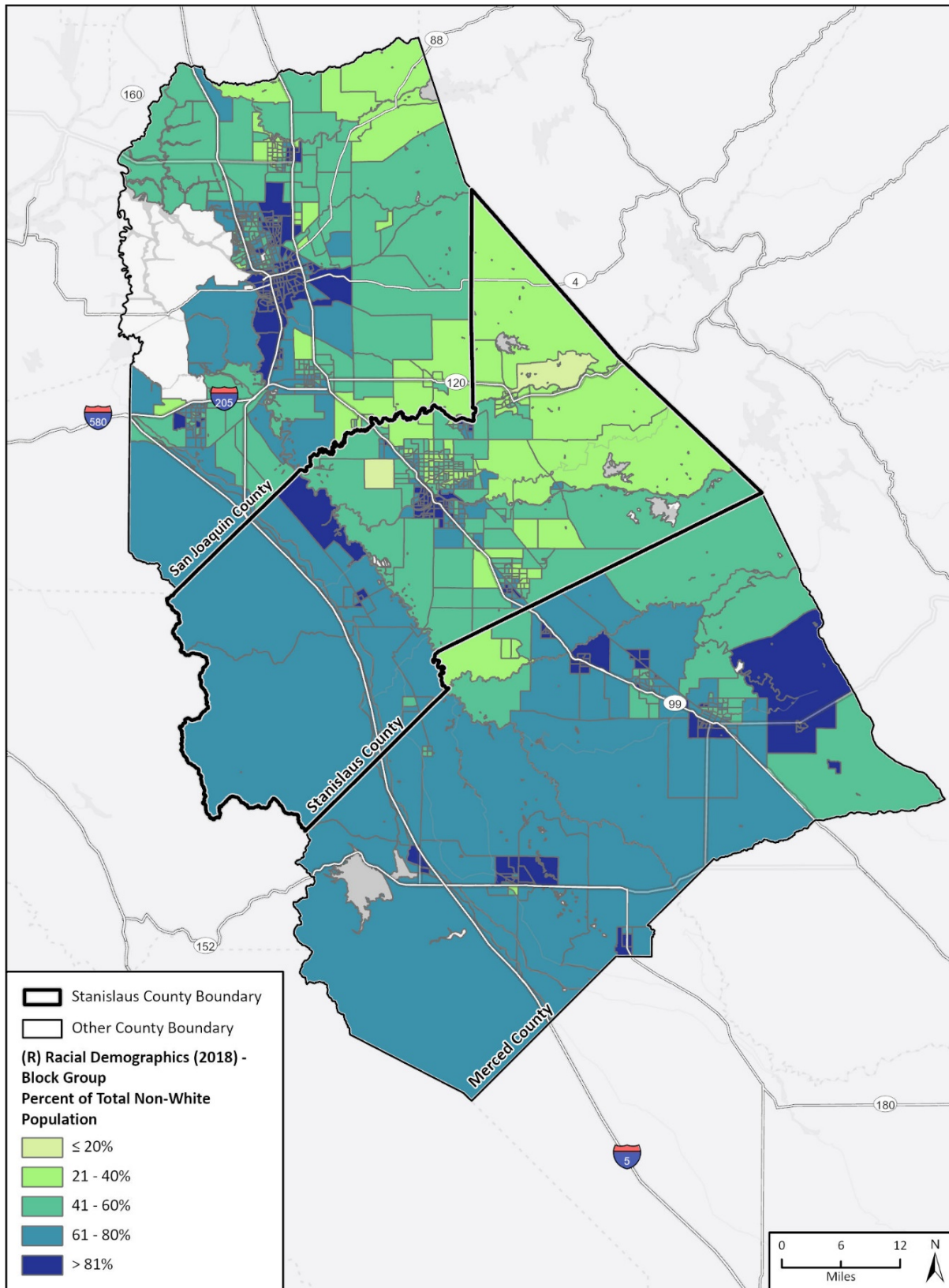
Figure 3-8 Racial Segregation and Integration, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021.

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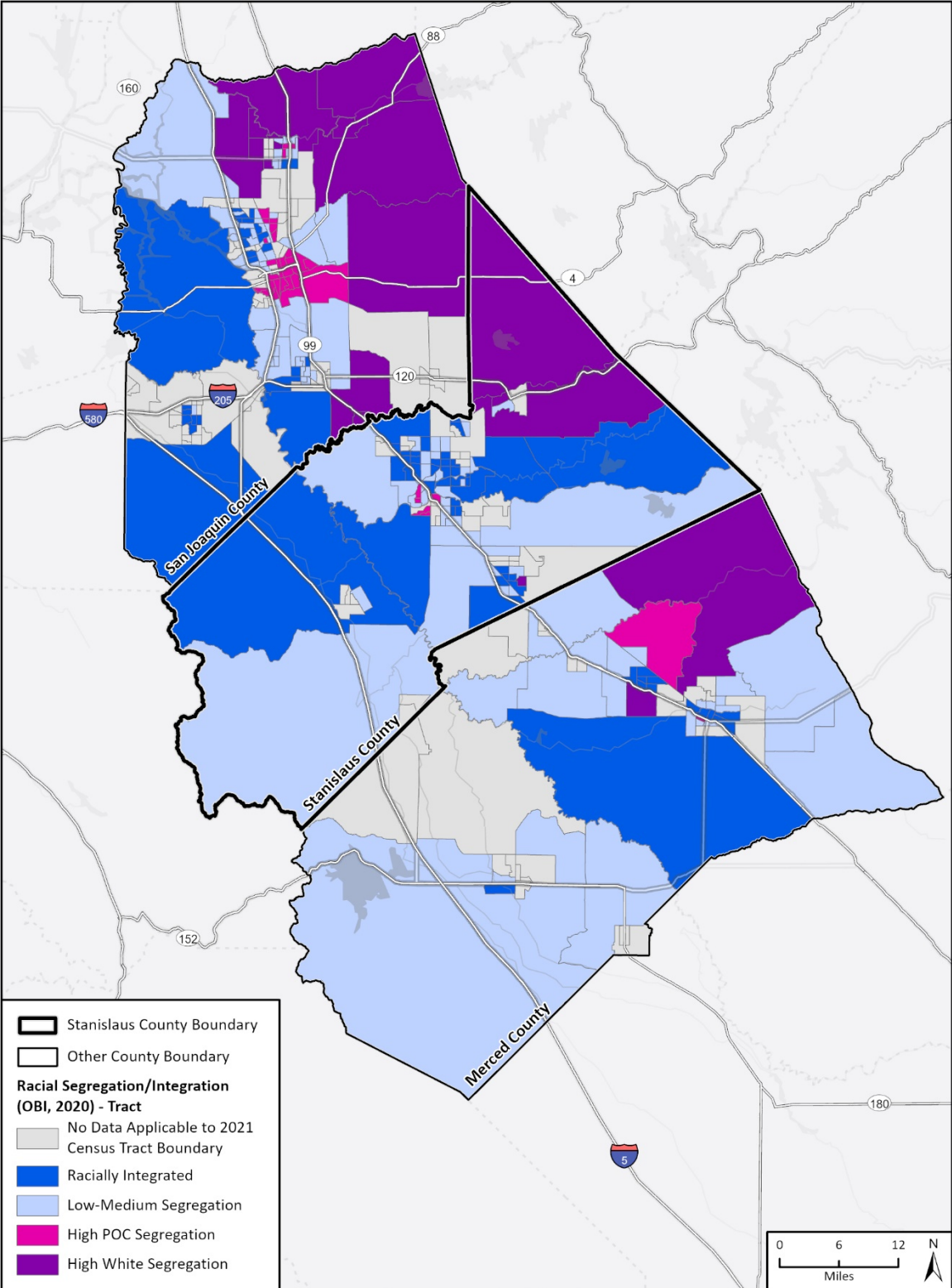
Figure 3-9 Percentage of 2018 Population that is Non-White by Block Group, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2020

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Figure 3-10 Racial Segregation and Integration, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021. 21_12095_HE AFFH AFFH - Regional

3.7 Persons with Disabilities

For persons with disabilities, fair housing choice and access to opportunity includes access to housing in the most integrated setting appropriate to an individual’s special needs and disability-related services as required under federal civil rights law. For example, persons with disabilities who are unable to use stairs or need a zero-step shower may not have actual housing choice without the presence of housing units with these accessibility features.⁸

High spatial segregation of persons with disabilities may indicate fair housing issues related to not only physical needs, but economic disparities. According to the *2020 Annual Report on People with Disabilities in America*, more than 25 percent of persons with disabilities (including physical, intellectual, and developmental; sensory; and other disability categories) live below the Census Bureau-designated poverty line, which is 14.5 percentage points higher than people without a disability.⁹ Persons with disabilities may be more reliant than persons without disabilities on fixed incomes or access to public transit.

Local

As referenced in Chapter 2, *Housing Needs Assessment*, 85,670 residents (approximately four percent) of Stanislaus County’s population live with one or more disabilities. Ambulatory difficulty, defined as having serious difficulty walking or climbing stairs, is the most common disability reported by Stanislaus County residents. From the ACS 2016-2020 data, 33 percent of individuals with a disability were unemployed, as seen below in Table 3-4. The unemployment rate of residents with a disability has stayed relatively unchanged in the past decade.

The highest percentage of the unincorporated county’s population living with a disability can be found in the CDP of West Modesto, as shown in Figure 3-11. In West Modesto, 20 percent of the population has a disability. Areas in the County with a higher rate of individuals with a disability overlap with a further proximity to jobs, as well as a low transit score (less connectivity and transit services).

Table 3-4 Disability in Stanislaus County

Disability Status	Employed 2011-2015	Unemployed 2011-2015	Employed 2016-2020	Unemployed 2016-2020
No Disability	194,972 (93%)	101,782 (67%)	218,956 (95%)	106,370 (67%)
With a Disability	14,033 (7%)	49,828 (33%)	12,212 (5%)	51,489 (33%)
Total	209,005 (100%)	151,610 (100%)	213,168 (100%)	21,484 (100%)

Source: ACS Data 2015 & 2020 5 year Estimates, Table S1811

Note: Employment rates reflect the total population 16 and older.

Regional Comparison

Stanislaus County has a similar distribution of population living with a disability to the Northern San Joaquin Valley. In the region, approximately 12.5 percent of the total population live with one or more

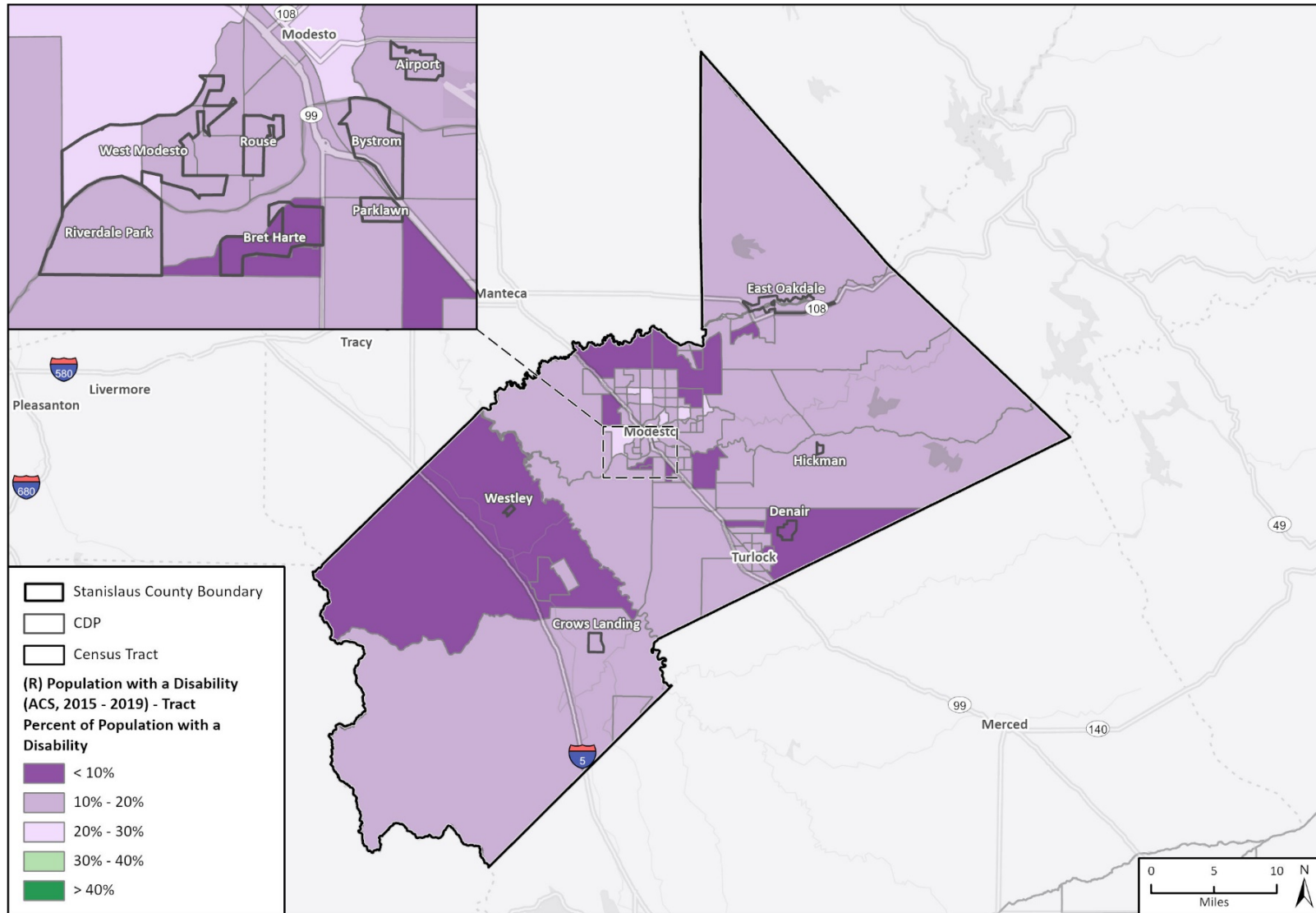
⁸ HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

⁹ The Rehabilitation Research and Training Center on Disability Statistics and Demographics 2020. <https://disabilitycompendium.org/annualreport>

disabilities with the most common disability being hearing difficulty¹⁰. In most of the Northern San Joaquin Valley region, 10 to 20 percent of the population have a disability. Throughout the central part of the region, there are some areas with a lower concentration of persons living with a disability (less than 10 percent of the population). The areas with the highest percentage of individuals with a disability (20 to 30 percent) are located near major cities and along major highways (Figure 3-12).

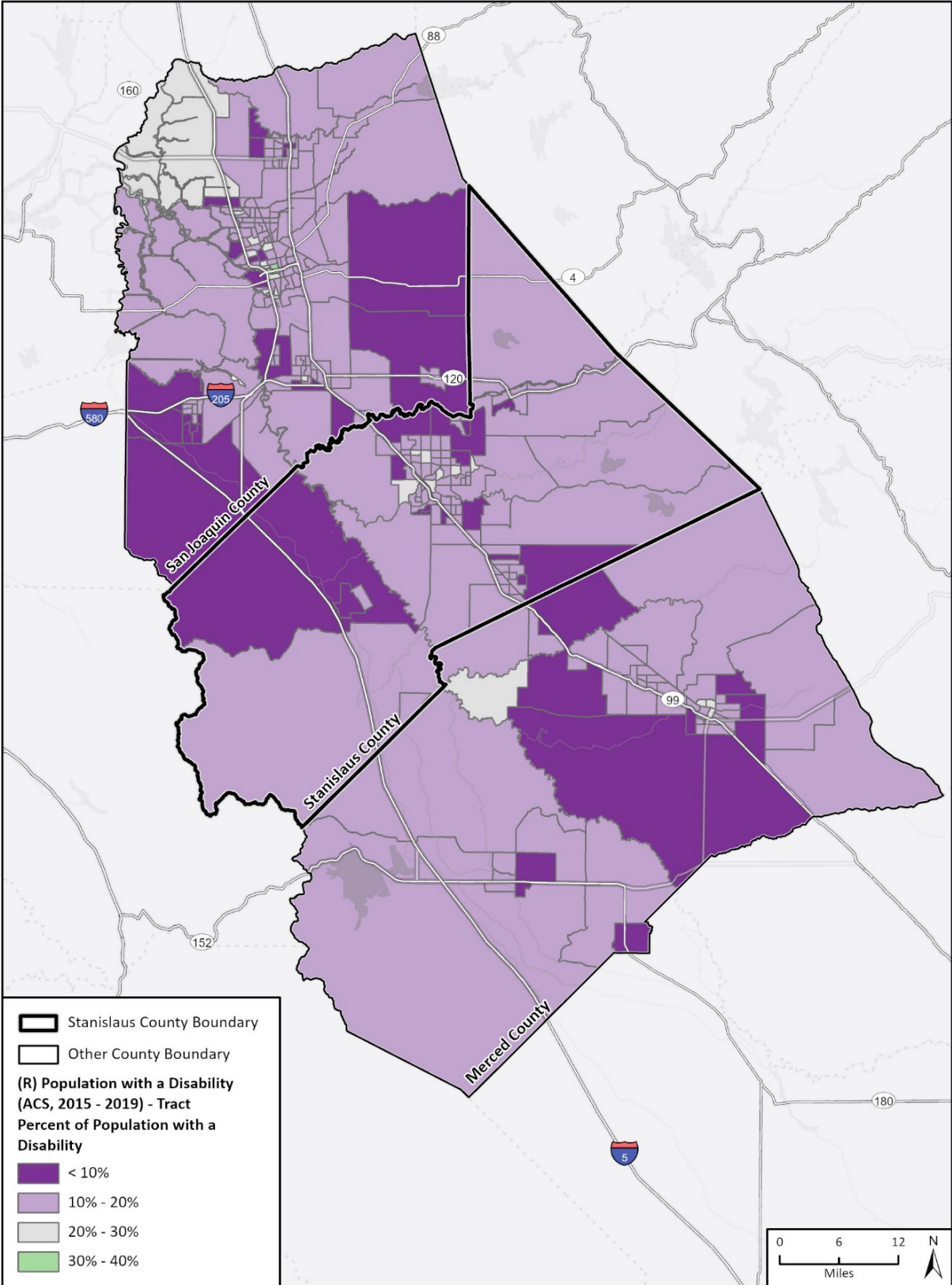
¹⁰ U.S. Census Bureau, American Community Survey 5-Year Data (2017-2021), Table S1810

Figure 3-11 Population with a Disability by Census Tract, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-12 Population with a Disability by Census Tract, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

3.8 Familial Status

According to the Fair Housing Act, familial status refers to the presence of children under the age of 18 in a household with a legal guardian or designee of such guardian.¹¹ HUD provides examples of familial discrimination as (a) refusing to rent to families with children; (b) evicting families once a child joins the family through, e.g., birth, adoption, custody; (c) requiring families with children to live on specific floors or in specific buildings or areas; (d) imposing overly restrictive rules about children’s use of the common areas (e.g., pools, hallways, open spaces); and (e) advertising that prohibits children.¹² Single-parent households are protected by Government Code Section 65583(a)(7). Because of their relatively lower incomes and higher living expenses, single-parent households can have limited options for affordable, decent, and safe housing. As a result, single parents are among the groups most at risk of experiencing poverty.

In addition to barriers to fair housing for single-parent households, large families can also experience housing discrimination as property owners impose occupancy limitations that can preclude large families with children. HUD data shows that familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to disability and race.¹³

Local Trends

Unincorporated Stanislaus County has a higher percentage of children in married-couple households than in female-headed households. In comparing unincorporated Stanislaus County to the county as a whole, the unincorporated county has a slightly higher percentage of households with children present specifically in married-couple households, as Table 3-5 shows. The distribution of married-couple households with children throughout the county is shown in Figure 3-13. The CDPs with the highest percentage of children in a married-couple household are the northeastern CDPs of East Oakdale and La Grange and the northwestern CDPs of Westley and Grayson.

Female-headed households with no spouse present with children present make up 5 percent of households in unincorporated Stanislaus County. The CDP of Empire is the area with the highest percentage of female-headed households (40-60 percent of all households), as seen in Figure 3-14.

¹¹ 42 U.S. Code sections 3601, *et seq.*, the Fair Housing Act.

¹² https://www.hud.gov/program_offices/fair_housing_equal_opp/discrimination_against_families_children#_Who_Is_Protected?

¹³ U.S. Department of Housing and Urban Development. “Annual Report on Fair Housing FY 2017.”

Table 3-5 Household Type and Presence of Children, Stanislaus County

	Unincorporated Stanislaus County		Stanislaus County		California	
	Number	Percent	Number	Percent	Number	Percent
Married-Couple Household with Children	8,703	25.1%	42,352	24.2%	2,784,123	21.2%
Male householder, no spouse present with children	784	2.3%	3,000	1.7%	170,832	4.7%
Female householder, no spouse present with children	1,681	4.9%	10,203	5.8%	615,734	26.2%
Nonfamily household	7,886	22.7%	44,769	25.6%	4,116,448	31.4%
Total households with children present	11,168	32.2%	55,555	31.8%	3,570,689	27.3%
Total Households	34,657		174,826		13,103,114	

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B11012

Additionally, Stanislaus County has a greater portion of large households (five or more persons per household) compared to the state average. Often, large households face significant difficulty in locating adequately sized, affordable housing due to the limited supply of appropriately sized homes. In unincorporated Stanislaus County, 20 percent of households are large households, compared to 13 percent of the state, as shown in Table 3-6.

Table 3-6 Large Households

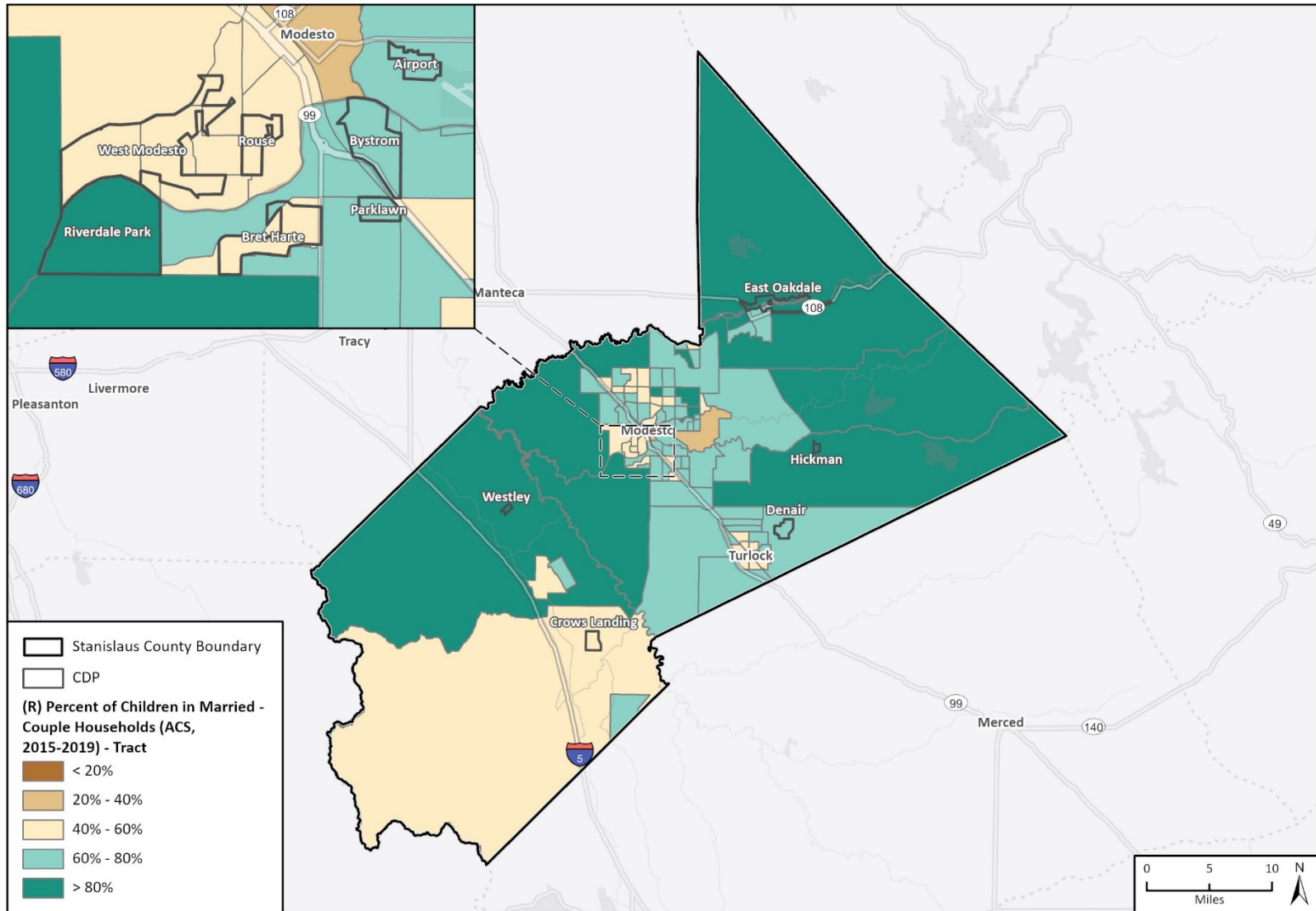
	Unincorporated Stanislaus County		Stanislaus County		California	
	Number	Percent	Number	Percent	Number	Percent
Total Occupied Housing Units	34,313		173,898		13,103,114	
Total Large Households (5 or More Persons)	7,021	20.5%	30,028	17.3%	1,809,518	13.7%
5-Person Household	3,673	10.7%	16,578	9.5%	1,025,856	7.8%
6-Person Household	2,024	5.9%	7,941	4.6%	440,129	3.3%
7-or-More Person Household	1,324	3.9%	5,509	3.2%	343,533	2.6%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25009

Regional Comparison

In comparison to the Northern San Joaquin Valley, Stanislaus County has a similar distribution of children in female-headed households. Most of the region's population consists of 20 percent or less of female-headed households with children. Within the region, the areas with the highest percentage of children present in female-headed households (typically 40-60 percent) were located near major cities and along major highways, as Figure 3-15 shows. Areas with a higher percentage of female-headed households regionally overlap with low resources and low job proximity. Regionally, concentrations of children in female-headed households are impacted by the availability of affordable units within proximity to jobs, transportation, and resources in these areas.

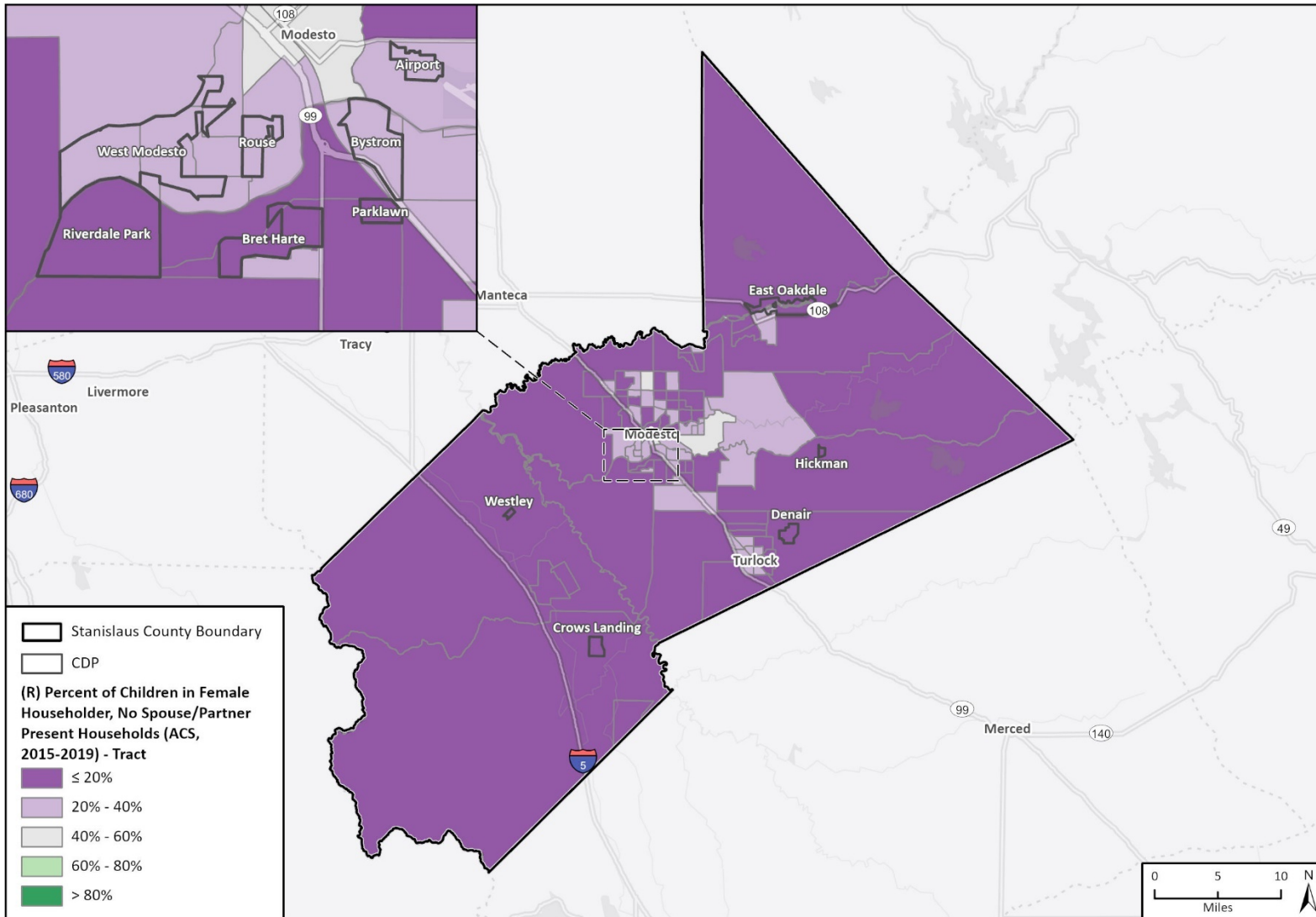
Figure 3-13 Children in Married-Couple Households by Census Tract, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

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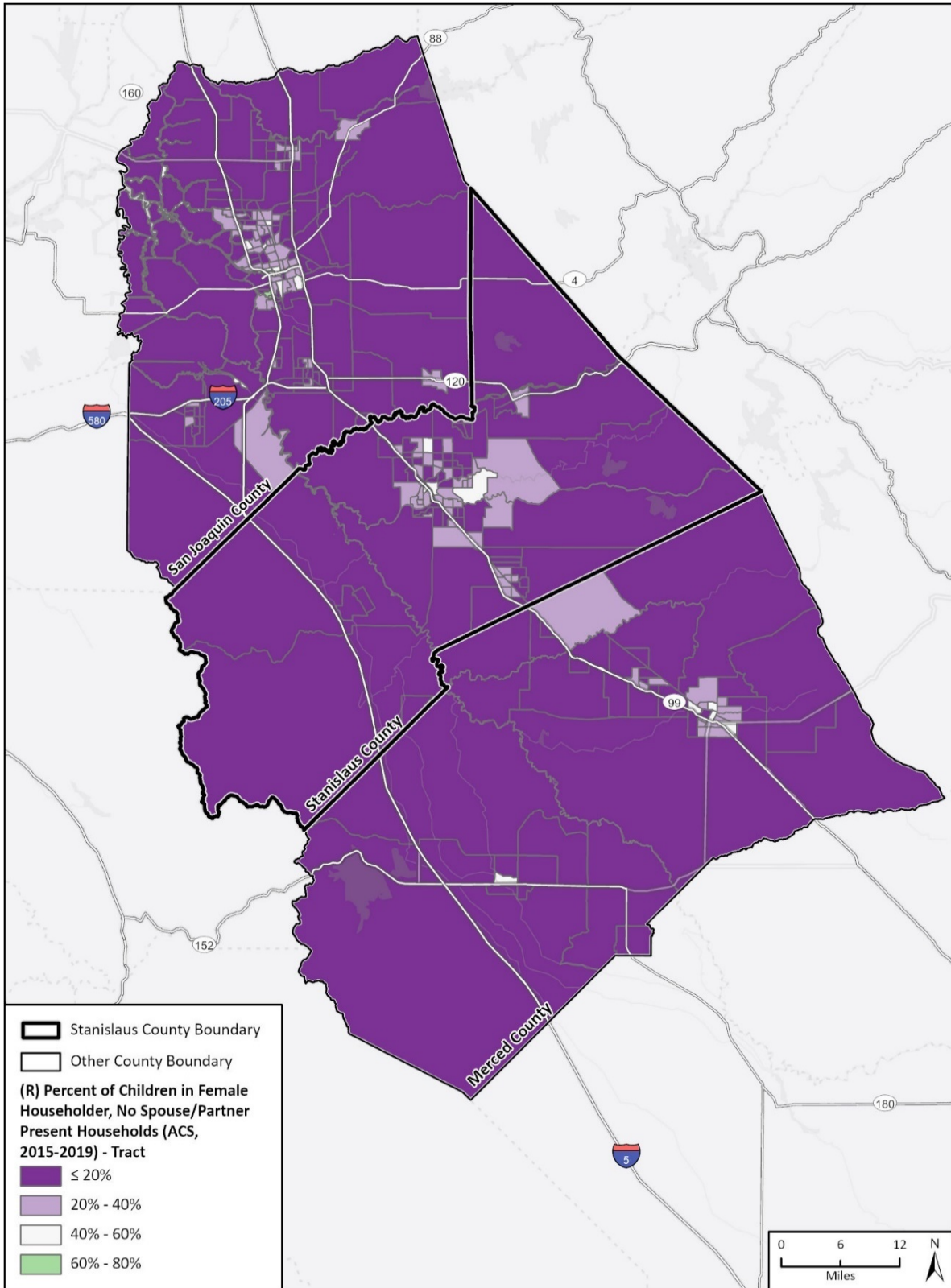
Figure 3-14 Children in Female-Headed Households, No Spouse/Partner Present by Census Tract, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

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Figure 3-15 Children in Female-Headed Households, No Spouse/Partner Present, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2020

3.9 Household Income

Household income is directly connected to the ability to afford housing. Higher-income households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of their income for housing, and they are more likely to occupy unsound and overcrowded housing.

Local Trends

As discussed in Chapter 2, *Housing Needs Assessment*, as of 2022 Stanislaus County had an estimated median household income of \$80,300. Median income is the middle value of the range of all household incomes in the County. According to 2020 ACS data, Stanislaus County had an overall lower median household income compared to the state for all household types, as displayed in Table 3-7. However, Stanislaus County's median household income varies by area, as shown in Figure 3-16. The areas with lowest median household incomes are in the CDPs of Airport (\$29,801) and Parklawn (\$29,185). The population in the South Modesto CDPs are predominantly Hispanic and have a higher rate of female-headed households. Comparatively, East Oakdale has the highest median household income of the county's CDPs (\$125,958). East Oakdale overlaps with concentrated areas of affluence and predominantly white populations.

HUD uses the term low- and moderate-income (LMI) and defines an LMI area as a census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the area median income or AMI). In Stanislaus County, the CDPs with a high population of LMI residents are in South Modesto, particularly in Bret Harte (83 percent) and Rouse (79 percent), as well as West Modesto (80 percent), as shown in Figure 3-17.

Table 3-7 Median Income by Household Type

	Stanislaus County	California
All Family Households	\$62,873	\$78,672
Families*	\$69,654	\$89,798
Married-Couple Families	\$84,059	\$107,111
Nonfamily Households	\$37,346	\$50,894

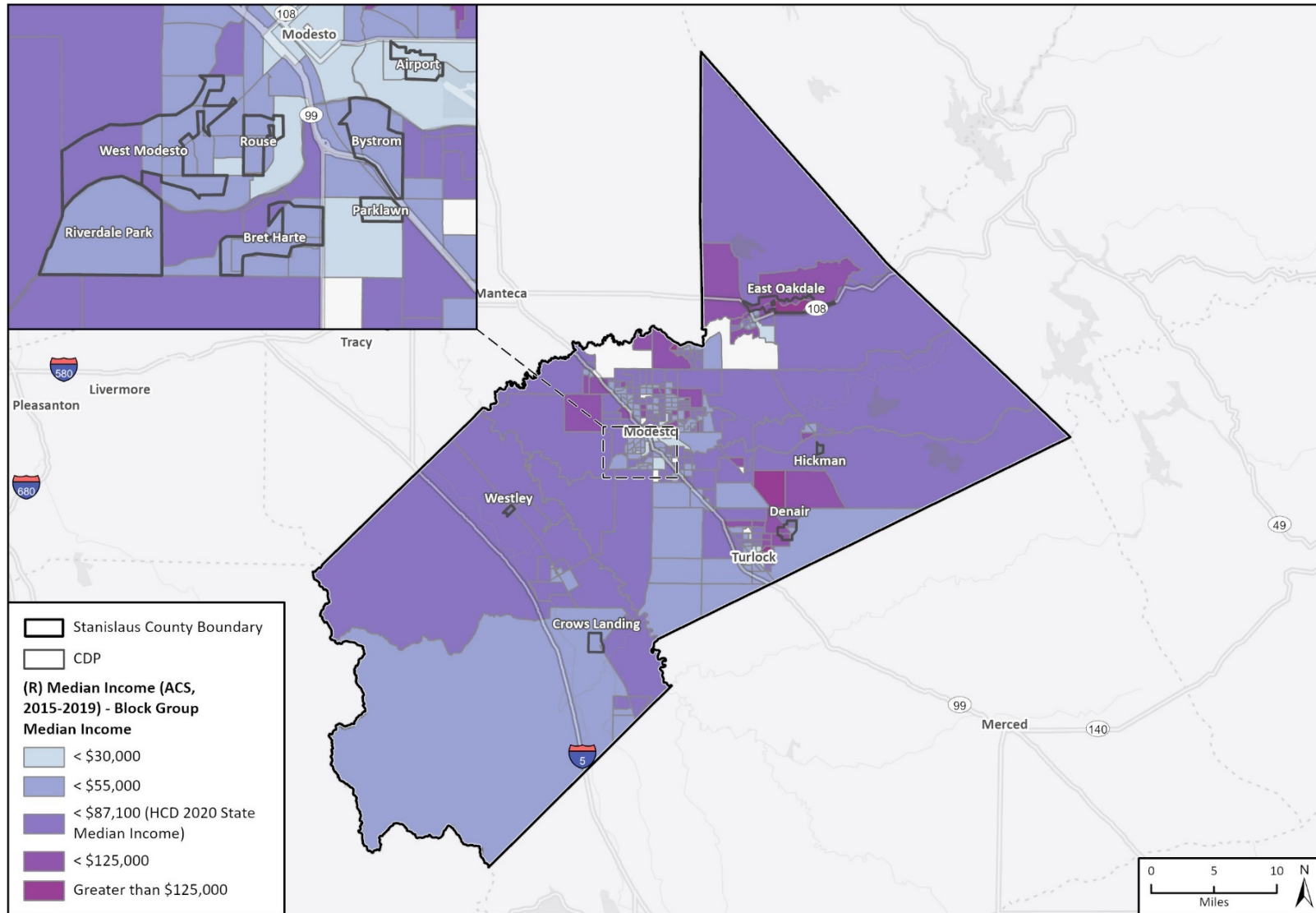
*The U.S. Census defines "family" as a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Source: ACS 5 Year, 2016-2020, S1901

Regional Comparison

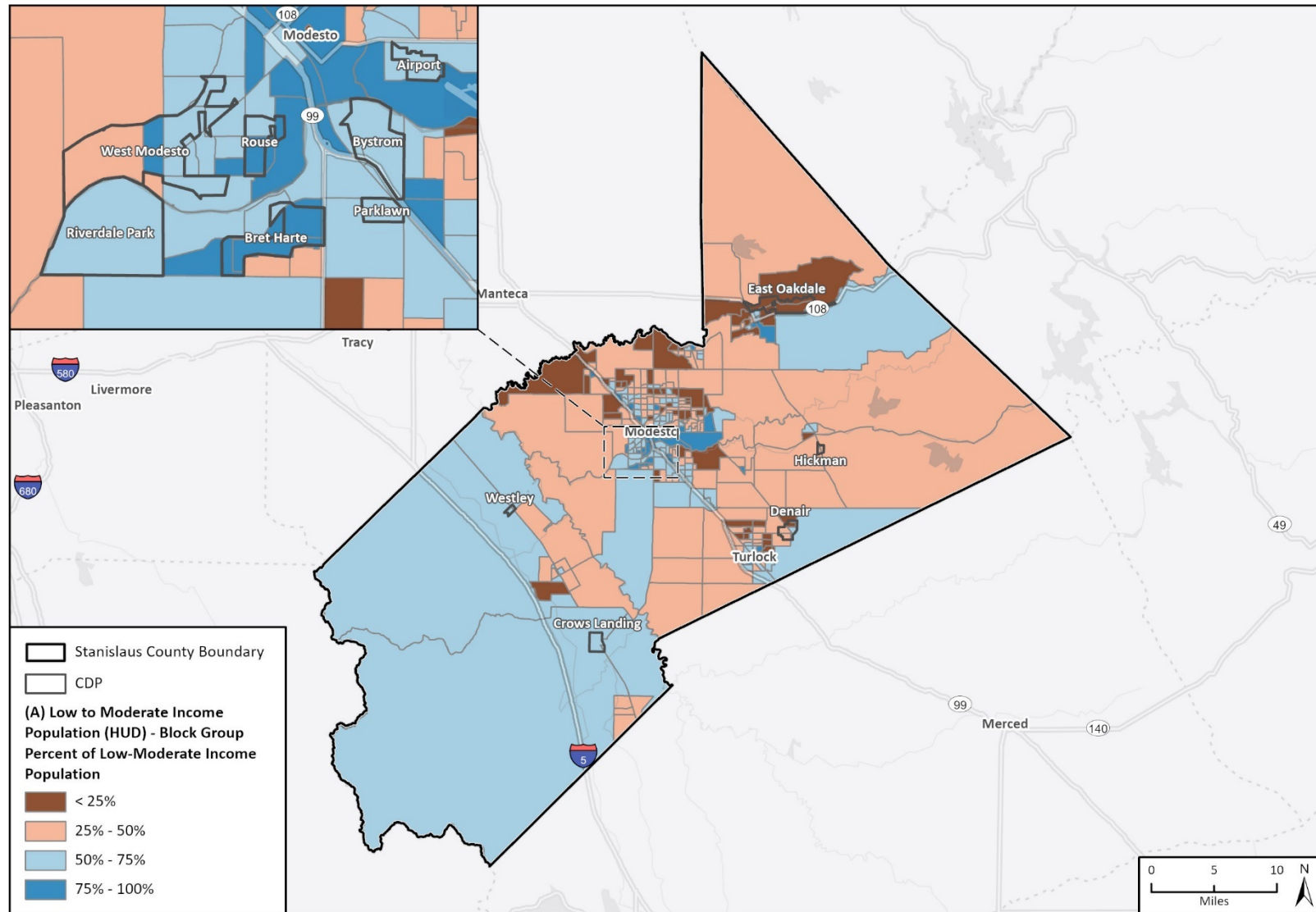
The Northern San Joaquin Valley has a similar pattern of LMI households to Stanislaus County. Within each county, the areas with the highest percentage of LMI income population (between 75 to 100 percent) are located near major cities and along major highways, as Figure 3-18 displays.

Figure 3-16 Median Household Income by Block Group, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

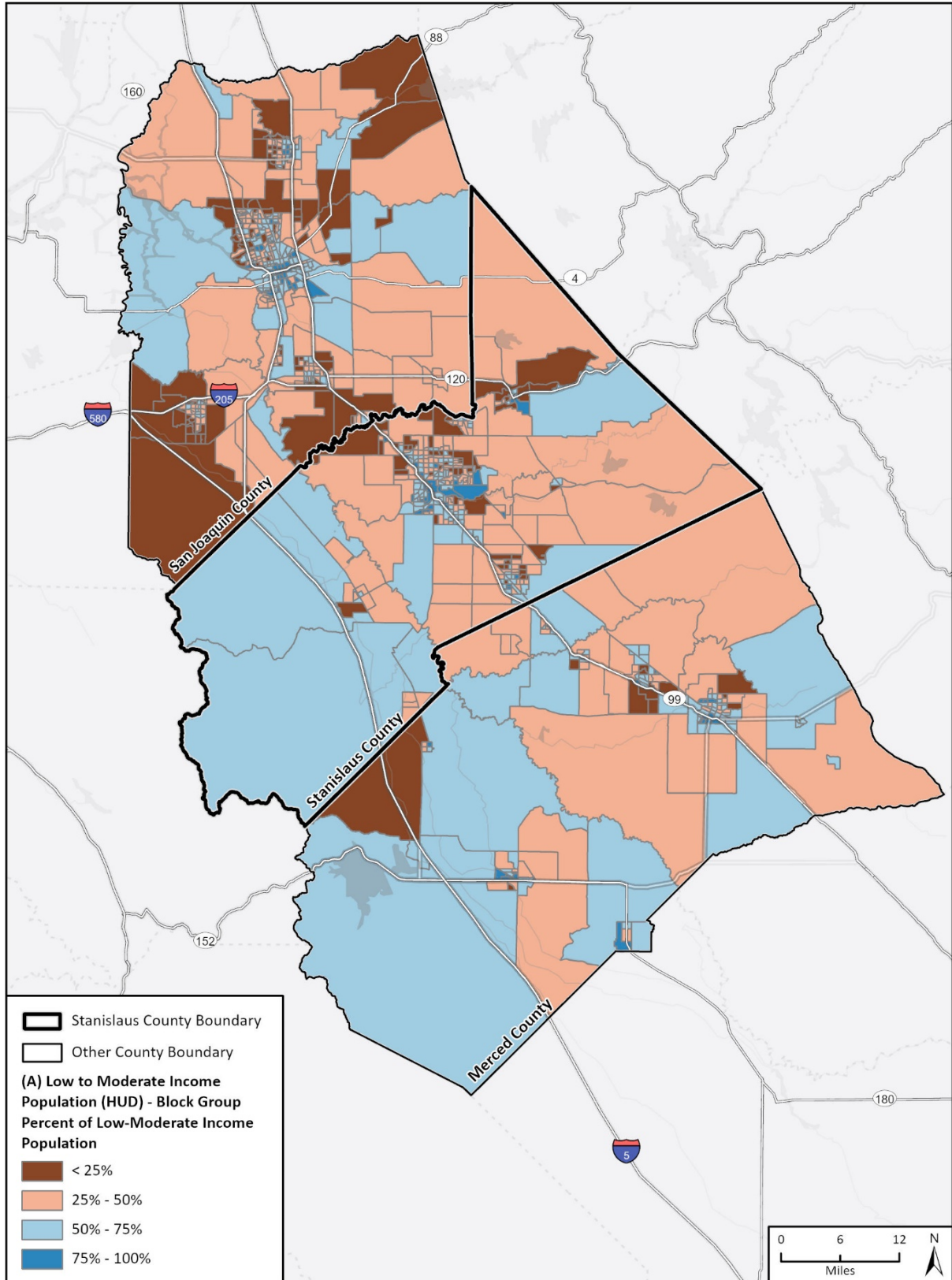
Figure 3-17 Percent Low to Moderate Income Population by Block Group, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

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Figure 3-18 Percent Low to Moderate Income Population by Block Group, Region



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3.9.1 Racially and Ethnically Concentrated Areas of Poverty

To identify Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs), HUD developed thresholds based on racial and ethnic concentration and income level. The threshold for racial and ethnic concentration is a non-white population of 50 percent or more in metropolitan or micropolitan areas. The income threshold is based on areas of “extreme poverty,” where 40 percent or more of households earn incomes at or below the federal poverty line, or where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. An area that meets both thresholds for racial or ethnic concentration and “extreme poverty” is considered a R/ECAP.

3.9.2 Poverty

Local Trends

According to HUD 2009-2013 data, there are four R/ECAPs in Stanislaus County. Three R/ECAPs overlap with the Airport, Rouse, and Bret Harte CDPs (see Figure 3-20), which align with patterns of the population earning an income below the poverty level. In Airport and Bystrom, 30 to 40 percent of the population earns an income below the poverty level, as seen in Figure 3-19. All four R/ECAPs in the county consist of unincorporated islands substantially surrounded by the city of Modesto. These census tracts are predominantly Hispanic/Latino, with more than 81 percent of residents identifying as non-white. According to public feedback, these areas have experienced a consistent lack of public investment, such as sewer connections, stormwater improvements, sidewalks, and street lighting.

Overall, Stanislaus County has a similar percentage of its population living below the poverty level to the state average, as shown in Table 3-8. However, when comparing the County and State percentage of female-headed households below the poverty line, Stanislaus County is lower (Table 3-9). In unincorporated Stanislaus County, approximately 13 percent of female-headed households earned an income below the poverty line, lower than the state average of 22 percent. A high concentration of female-headed households overlaps with the greatest poverty rate near Empire.

Table 3-8 Income and Poverty

	Total	Below Poverty Level	Percent Below Poverty Level
Stanislaus County	547,099	75,765	13.8%
California	38,535,926	5,149,742	13.4%

Source: U.S. Census Bureau, ACS 2016-2020 (5-year Estimates), Table B17019

Table 3-9 Poverty by Female-Headed Households

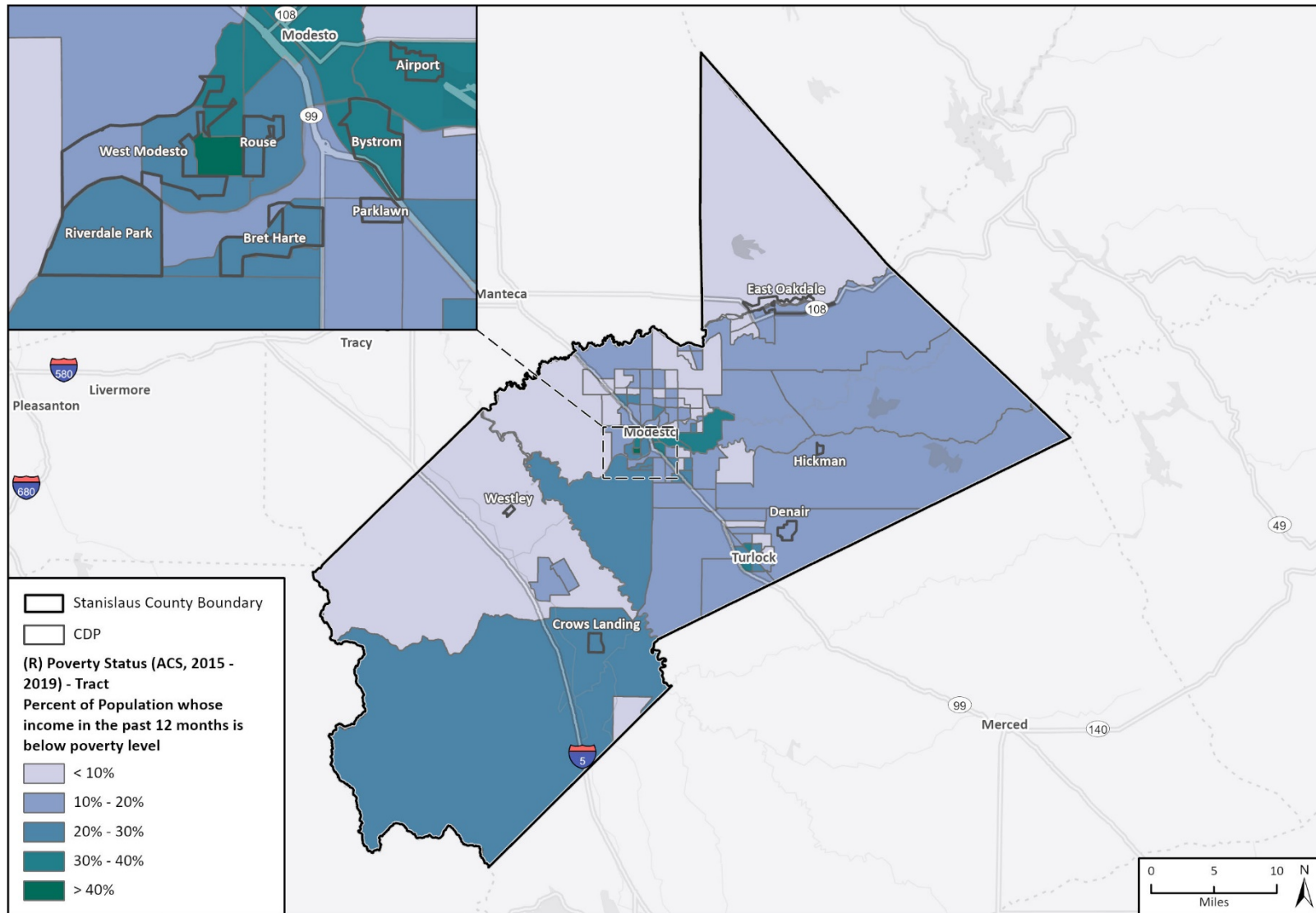
	Unincorporated Stanislaus County		Stanislaus County		California	
	Number	Percent	Number	Percent	Number	Percent
Below Poverty Line	3,500	13.1%	13,534	10.4%	364,236	21.5%
Above Poverty Line	23,238	86.8%	116,523	89.6%	1,329,038	78.5%
Total	26,771		130,057		1,693,274	

Source: U.S. Census Bureau, ACS 2016-2020 (5-year Estimates), Table B17010

Regional Comparison

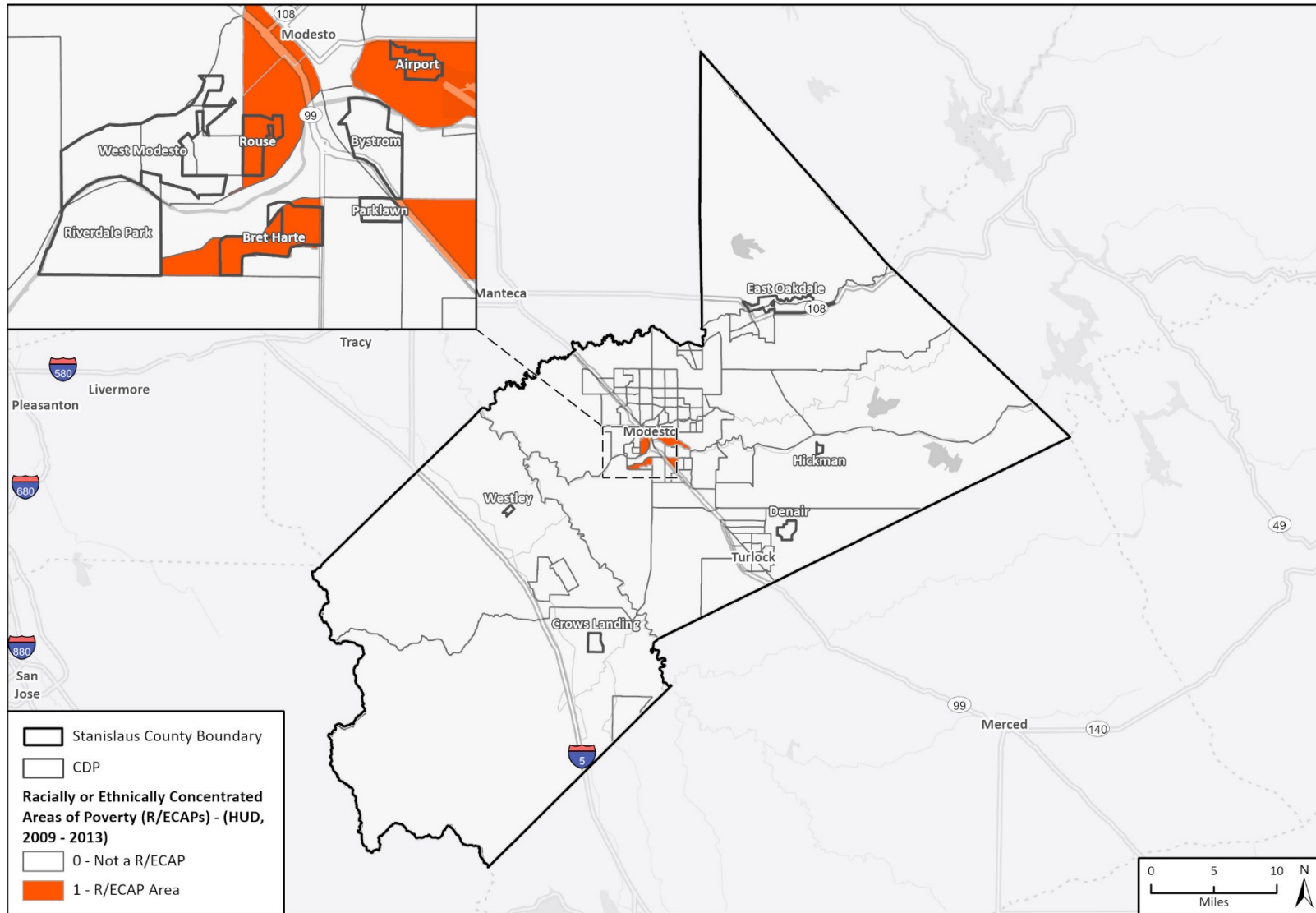
Stanislaus County compares similarly to the Northern San Joaquin Valley in its distribution of impoverished individuals and location of R/ECAP populations. Poverty levels throughout the region average 10-20 percent, with the more concentrated levels of poverty located near major cities and along major highways, as shown on Figure 3-21. R/ECAPs are also generally located near major cities and along major highways, as shown on Figure 3-22.

Figure 3-19 Poverty Status by Tract, Stanislaus County



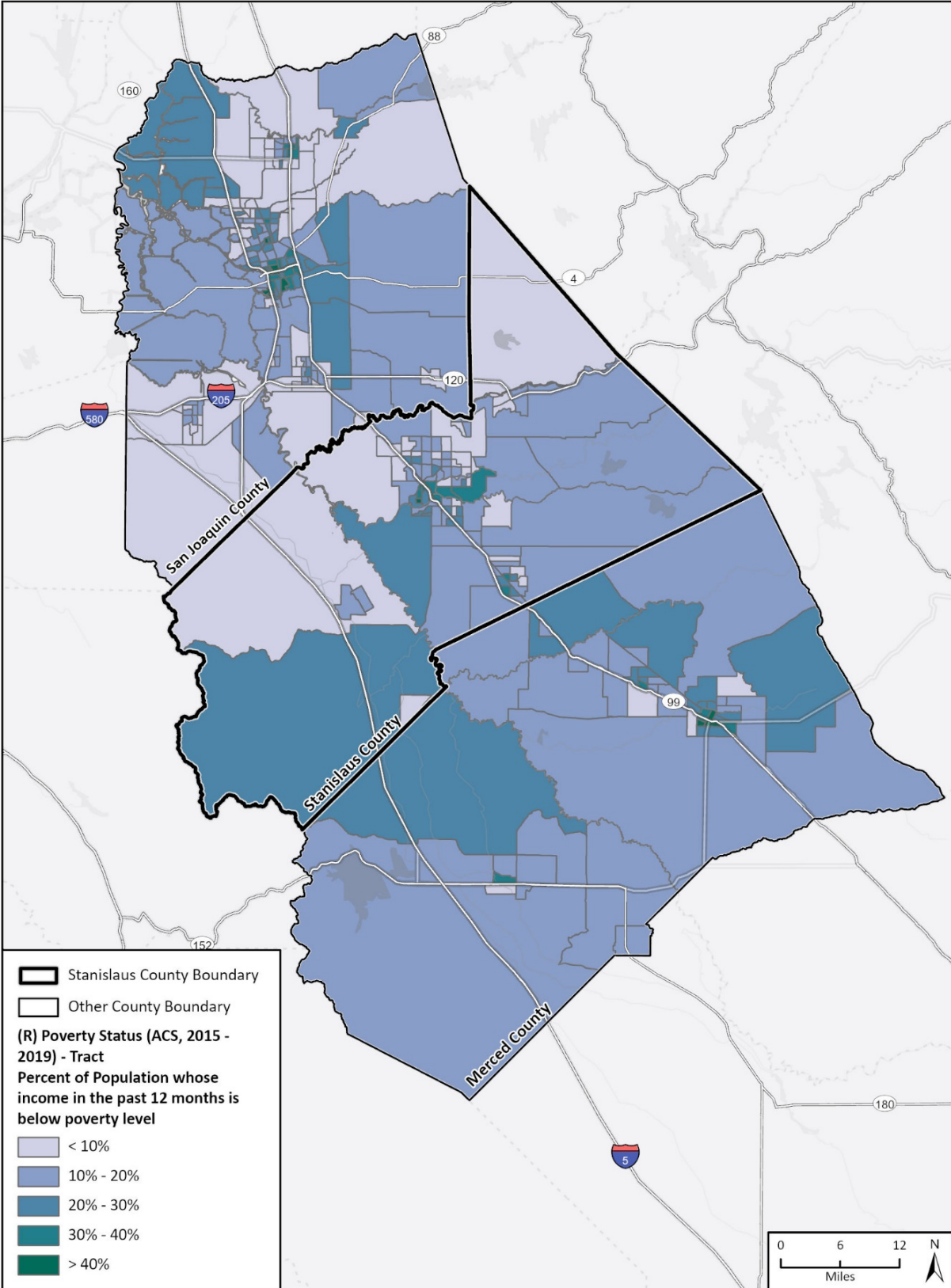
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

Figure 3-20 R/ECAPs in Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Sofegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

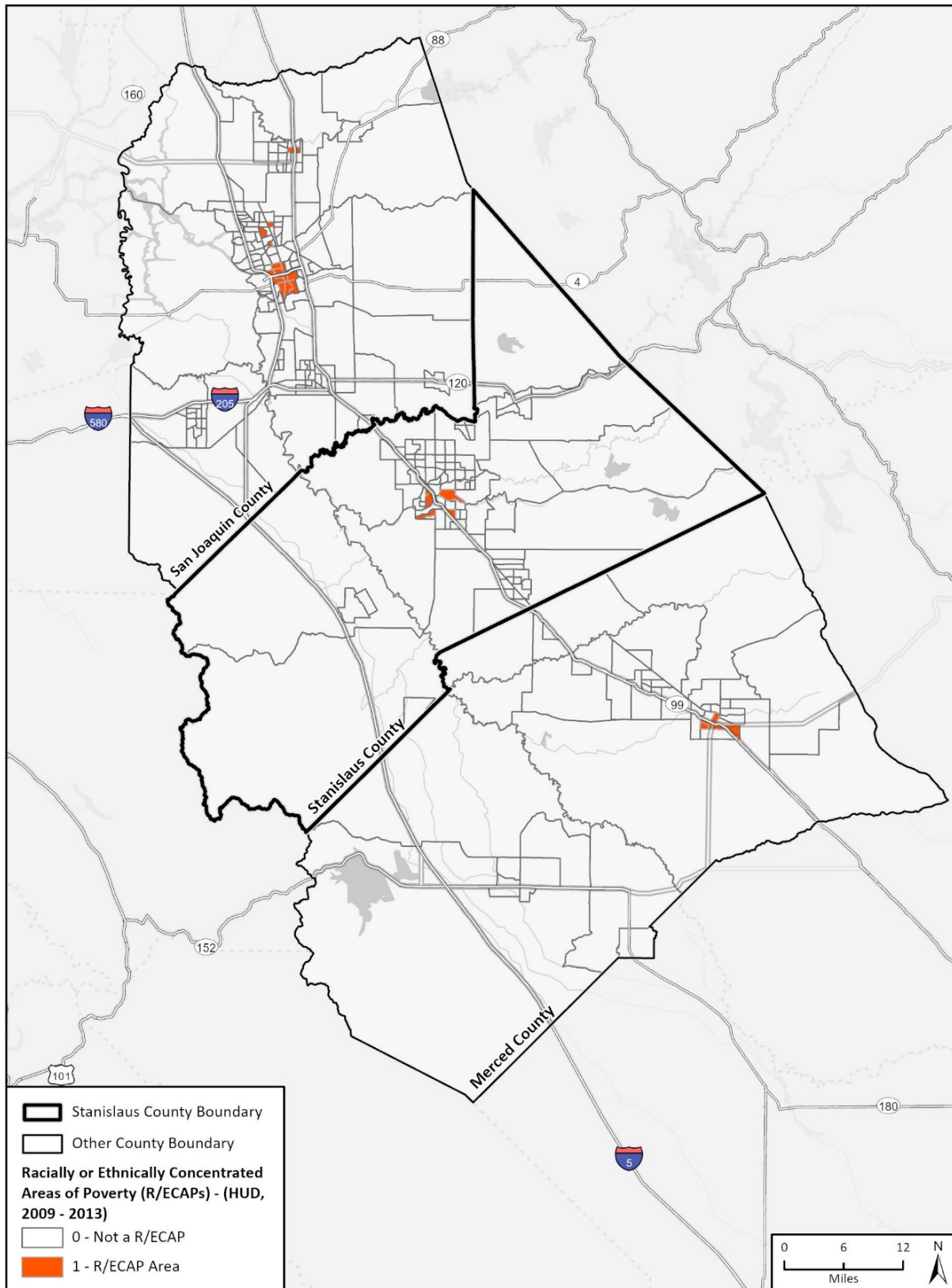
Figure 3-21 Poverty Status by Census Tract, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2020

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Figure 3-22 R/ECAPs, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

3.9.3 Concentrated Areas of Affluence

While R/ECAPs have been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated and promotes equitable access to opportunity, a key to fair housing choice. HCD defines an RCAA as a census tract in which 80 percent or more of the population is white and has a median income of at least \$125,000.¹⁴

Local Trends

As shown in Table 3-10, Stanislaus County had a lower median household income when compared to the state average for all racial and ethnic groups. There are two concentrated areas of RCAAs within Stanislaus County: the northeastern portion of the county where the CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home are located, and in and around Denair (Figure 3-23). Each RCAA overlaps with highest/high resource opportunity areas and a far proximity to jobs.

Table 3-10 Median Household Income by Race or Hispanic Origin

	Stanislaus County	California
White Alone Non-Hispanic	\$68,369	\$90,496
Black Or African American Alone Non-Hispanic	\$63,542	\$54,976
American Indian And Alaska Native Alone Non-Hispanic	\$48,761	\$60,182
Asian Alone Non-Hispanic	\$65,979	\$101,380
Native Hawaiian And Other Pacific Islander Alone Non-Hispanic	\$66,184	\$81,682
Some Other Race Alone Non-Hispanic	\$58,755	\$59,287
Two Or More Races Non-Hispanic	\$54,116	\$76,733
Hispanic Or Latino of Any Race	\$56,279	\$62,330

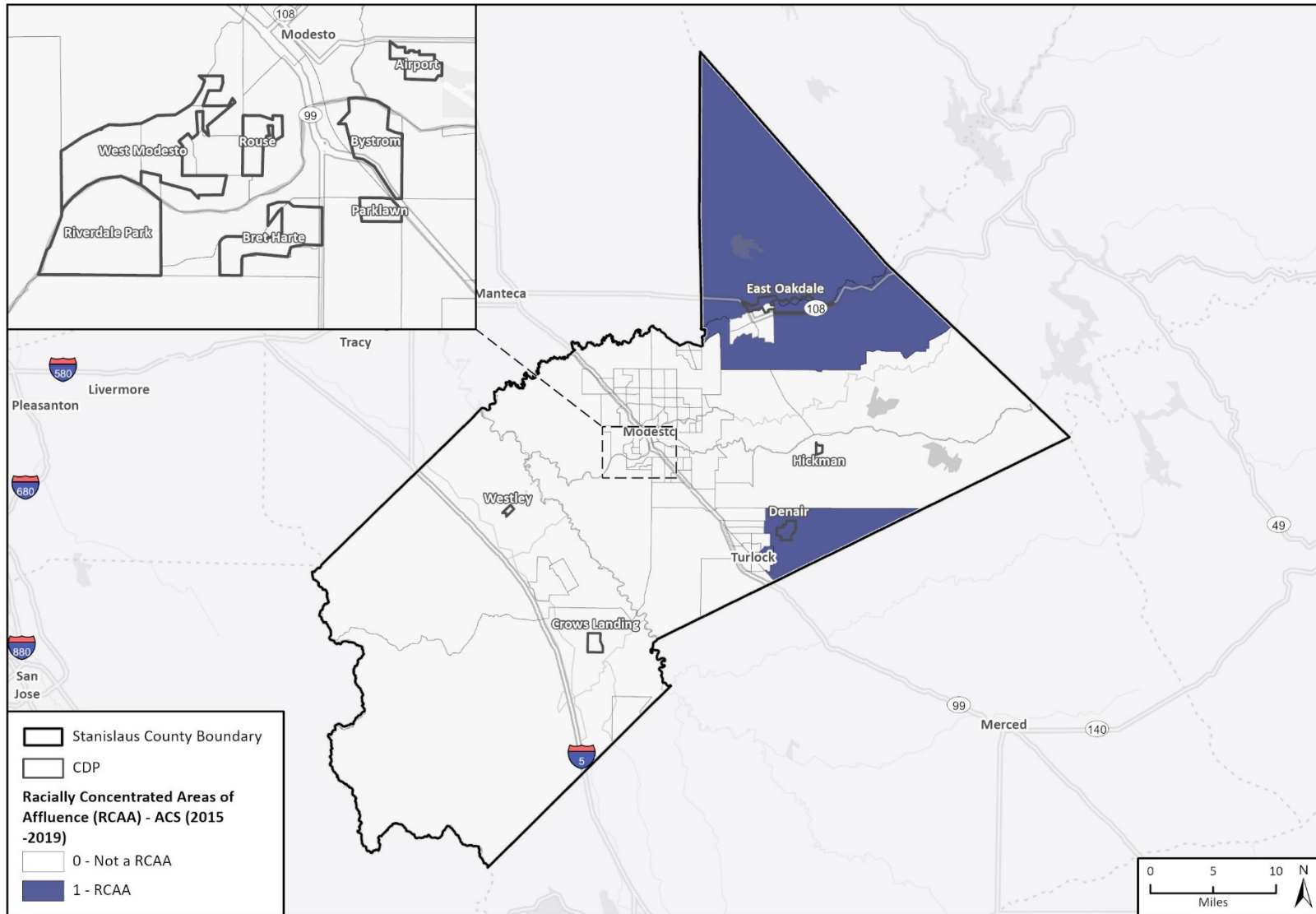
Source: U.S. Census Bureau, ACS 2016-2020 (5-year Estimates), Table S1903.

Regional Comparison

The RCAAs in surrounding counties have similar attributes to those found in Stanislaus County. The RCAAs in San Joaquin and Merced counties are in rural areas or isolated census tracts outside of incorporated cities (Figure 3-24).

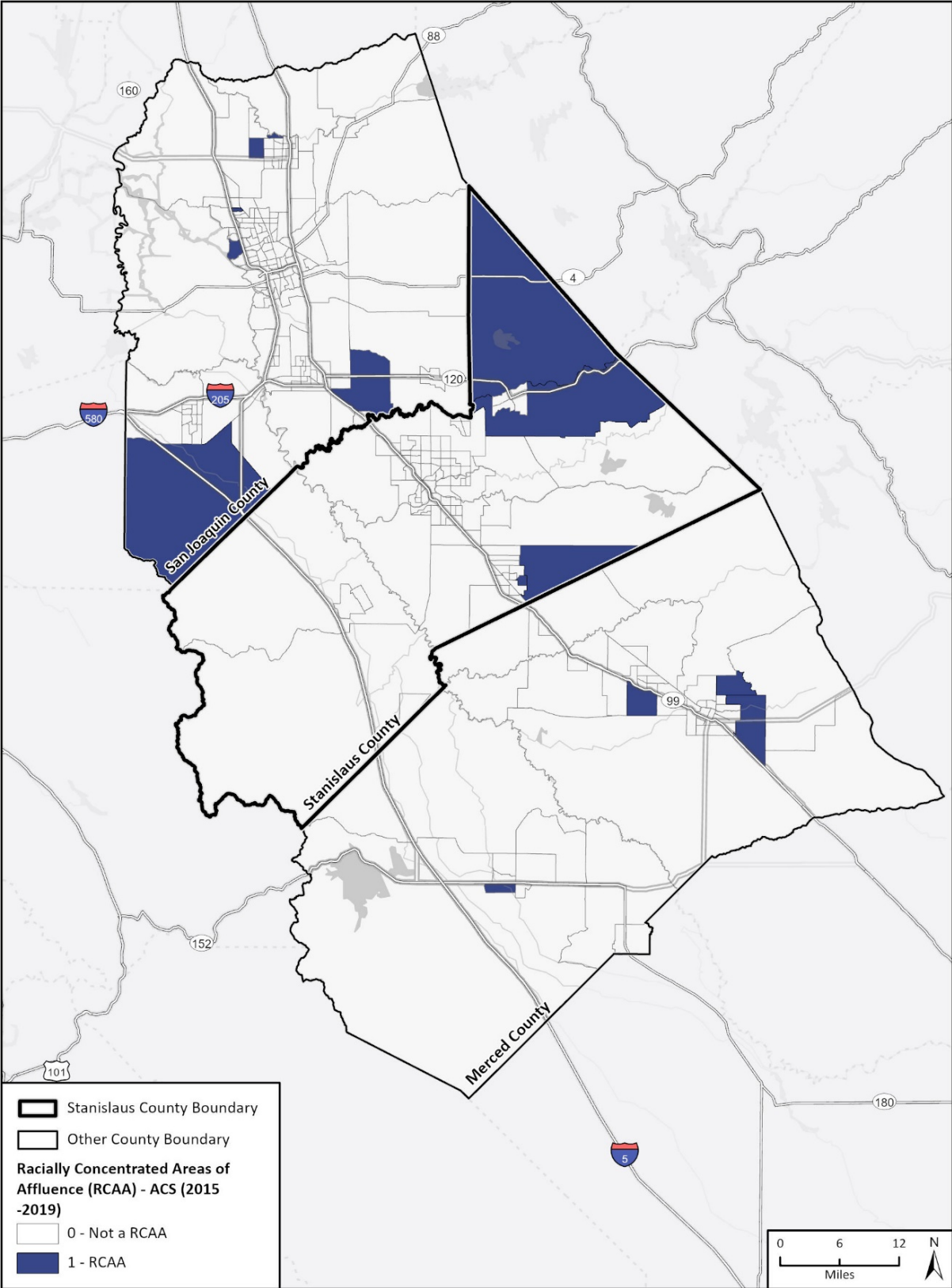
¹⁴ HCD. April 2021. AFFH Guidance for all Public Entities and for Housing Elements. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

Figure 3-23 Racially Concentrated Areas of Affluence, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-24 Racially Concentrated Areas of Affluence, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

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3.10 Location of Affordable Housing

The geographic distribution of publicly supported housing is an important factor in examining fair housing choice and segregation by income and race/ethnicity. Figure 3-25 shows the location of publicly supported affordable housing in Stanislaus County relative to racial/ethnic composition. The diagram shows publicly subsidized housing in relation to areas of concentrated segregation and poverty.

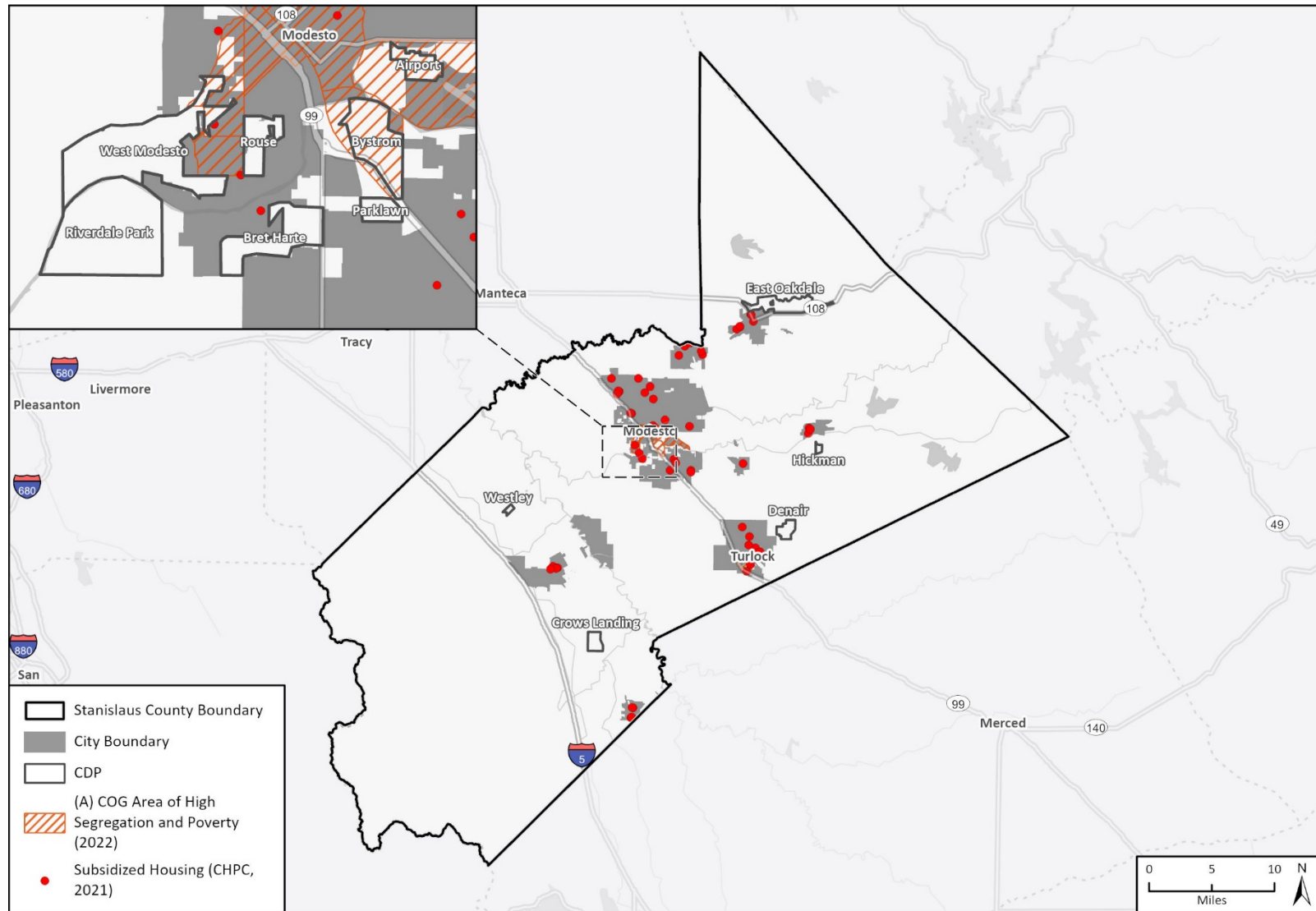
Local Trends

In Stanislaus County, there is a total of 54 publicly subsidized affordable housing developments. As Figure 3-25 displays, a majority of subsidized housing is located east of Highway 99 and in incorporated cities. According to 2021 data from the California Housing Partnership, there are no subsidized affordable housing developments in unincorporated Stanislaus County. Areas within the county that provide subsidized housing fall within areas where the median income is less than \$55,000. The overlap of subsidized housing and predominant race populations appears to have no correlation.

Regional Comparison

Similar to Stanislaus County, most of the subsidized housing throughout the region is in incorporated cities. However, unlike Stanislaus County, San Joaquin County and Merced County have publicly subsidized housing located in unincorporated communities.

Figure 3-25 Location of Publicly Supported Affordable Housing in Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

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3.11 Disparities in Access to Opportunities

This section examines place-based characteristics linked to critical life outcomes to evaluate disparities in access to opportunity. Access to opportunity includes access to education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, recreation, food, and a healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions). Several agencies have developed “opportunity indices” to assess and measure geographic access to opportunities, including HUD; the University of California at Davis, Center for Regional Change; and HCD in coordination with TCAC. For the purpose of this assessment, the opportunity index prepared by HCD and TCAC was used to analyze access to opportunity in Stanislaus County.

3.11.1 HCD/TCAC Opportunity Areas

The TCAC/HCD Opportunity Maps show areas that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. These opportunity maps are made from composite scores of three different domains made up of a set of indicators, as described in full detail in *Section 3.6.2, Opportunity Areas by Indicator*. The greater the composite score, the higher the resources in that tract. The primary function of TCAC is to oversee the Low-Income Housing Tax Credit (LIHTC) Program, which provides funding to developers of affordable rental housing. The opportunity maps play a critical role in funding decisions to facilitate the development of affordable housing in areas with the highest opportunity as well as determining the RHNA for the County.

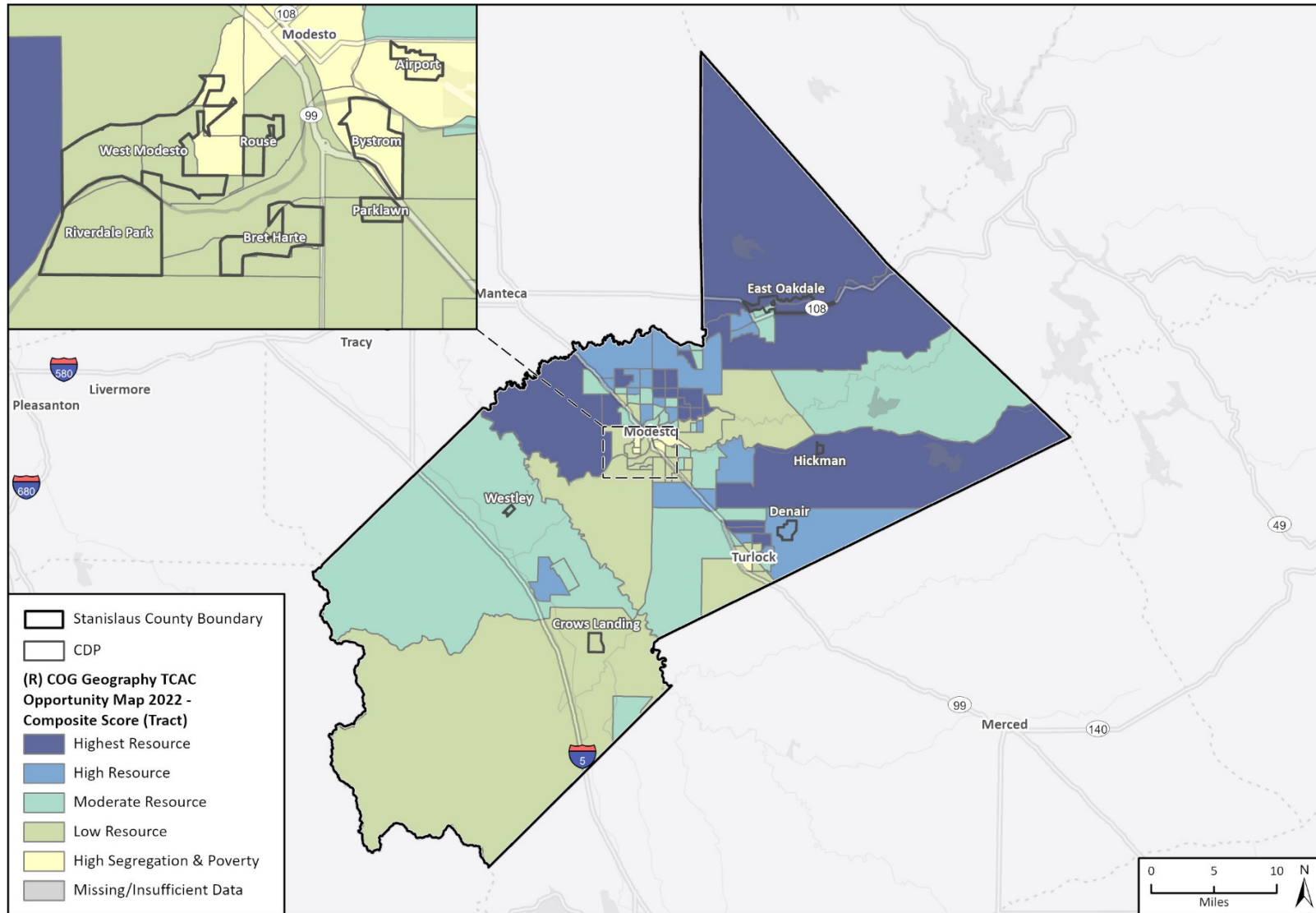
Local Trends

The TCAC opportunity area composite score varies from very low to very high throughout the county, as shown in Figure 3-26. Low-resource areas in the central area of the county are in the CDPs of South Modesto and Empire, as well as in Crows Landing. Moderate-resource areas are in the southwestern CDPs of Westley and Grayson, and half of Salida. High-resource areas can be found in the northern part of Salida, Keyes, and Denair. Areas with the highest resources are scattered throughout the county but are found in the northwestern CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, as well as Hickman. Conversely, the CDPs of Airport and Bystrom have areas of high segregation and poverty. Based on composite scores for economic, educational, and environmental opportunities, access to opportunity varies widely throughout the county. Areas of high segregation and poverty and low resource areas (concentrated in southwestern and central parts of the county) overlap with areas that are predominantly Hispanic/Latino, and areas with lower median household incomes and some of the highest poverty rates in the county.

Regional Comparison

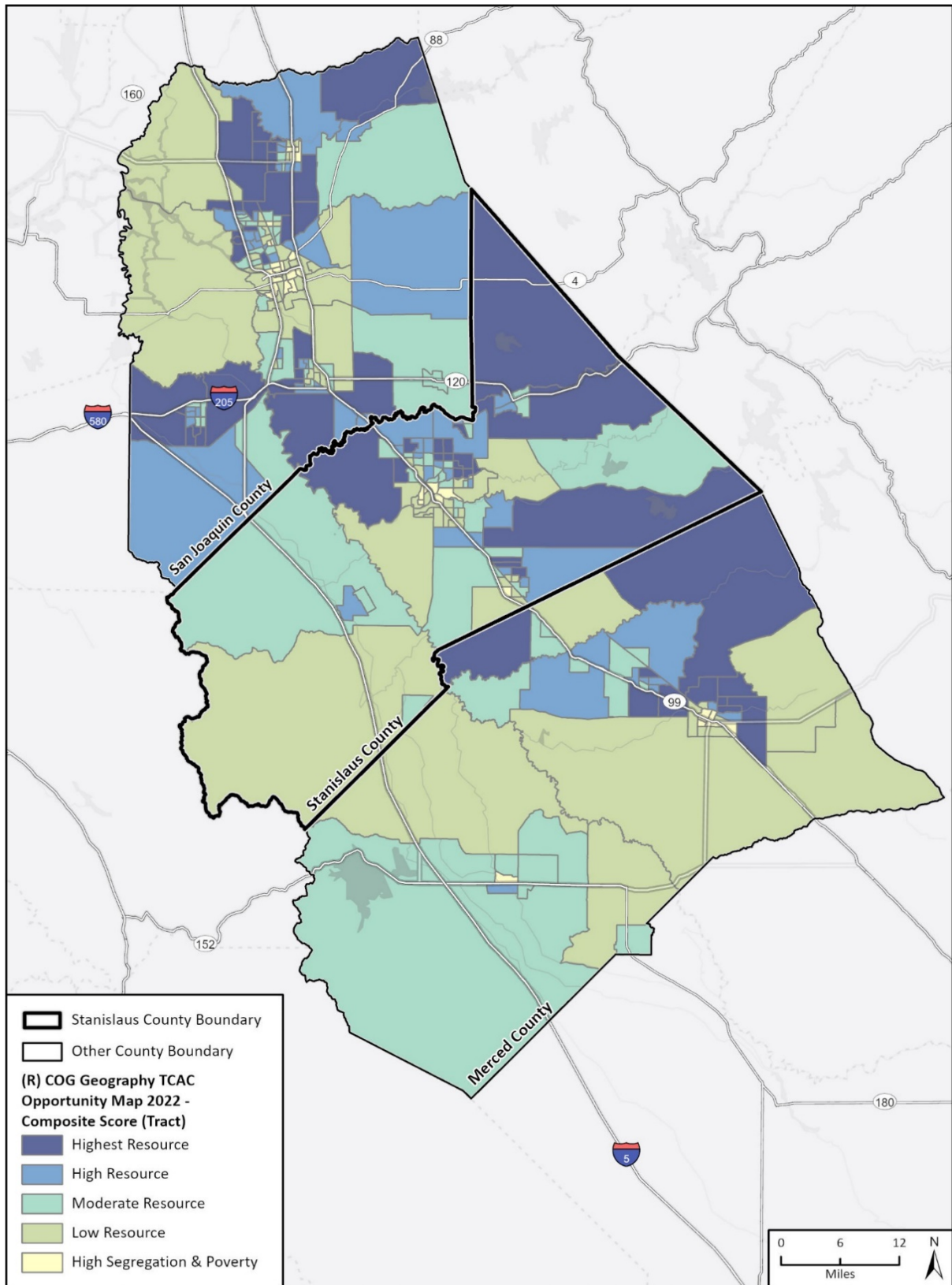
In comparison the Northern San Joaquin Valley, Stanislaus County is similar to the other counties distribution of opportunity areas, as seen in Figure 3-27. The lower-resource areas are generally located in incorporated cities. There is no consistent pattern of highest-resource areas throughout the region, as each county has concentrations in different types of landscapes (rural or more urban). In San Joaquin County, those areas are distributed throughout the county. In Merced County, more rural tracts toward the mountains in the east are higher resource.

Figure 3-26 HCD/TCAC Opportunity Areas by Census Tract, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-27 HCD/TCAC Opportunity Areas, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

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3.11.2 Opportunity Areas by Indicator

An area's access to opportunity is defined by HUD as its potential to support positive economic, educational, and health outcomes for low-income families, particularly in terms of long-term outcomes for children. HCD and TCAC analyzed poverty rates, school proficiency, unemployment rates, jobs proximity, transit metrics, and CalEnviroScreen 4.0 scores to assess access to opportunity throughout Stanislaus County. The 2021 TCAC/HCD Opportunity Maps are comprised of composite index scores, including education, economic, and environmental. The higher composite scores mean more access to resources that offer residents a better chance at economic advancement, positive educational outcomes, and better physical and mental health. HCD/TCAC indices demonstrate that Stanislaus County has areas with consistently mid-range opportunity and moderate access to resources, and that opportunity scores are generally higher in areas near job centers. Therefore, lack of access to employment opportunities and job proximity, and low labor market engagement is an impediment for affirmatively furthering fair housing in the County. Figures 25 through 33 show the County's score as it relates to access to economic, educational, and environmental opportunity as found using TCAC/HCD opportunity area methodology as well as transportation access.

Economic Opportunity and Jobs Proximity Index

The TCAC/HCD Task Force economic outcome scoring methodology is based on the following indicators:

- Poverty (the percent of the population with income above 200 percent of the federal poverty line)
- Adult education (the percent of adults with a bachelor's degree or above)
- Employment (the percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces)
- Job proximity (the number of jobs filled by workers with less than a bachelor's degree that fall within a given radius (determined by the typical commute distance of low-wage workers in each region))
- Median home value (value of owner-occupied units)

The 2014-2017 HUD jobs proximity index quantifies the accessibility of a given neighborhood to all jobs within a core-based statistical area (CBSA). Accessibility to jobs is measured by distance "as the crow flies" to employment centers and does not integrate transportation and commuter data. Larger employment centers are weighted more heavily. The higher the index value, the better access to employment opportunities for residents in a neighborhood.

Local Trends

Stanislaus County has a generally moderate economic opportunity score and relatively good access to jobs. Economic opportunity throughout the county is generally moderate, falling between the 0.25 to 0.75 range as seen in Figure 3-28. The more positive economic outcomes are in the northeastern CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, as well as in Salida. Less positive economic outcomes are found in the South Modesto CDPs, Empire, and Crows Landing. Incorporated cities surrounding these CDPs follow the same trend. Areas with more positive economic outcomes generally overlap with areas that are predominantly white and have higher median household incomes, greater than \$87,100 per year (the State median household income). In contrast, areas with less positive economic outcomes overlap with areas that are predominantly Hispanic/Latino and have lower median household incomes, generally less than \$55,000 per year.

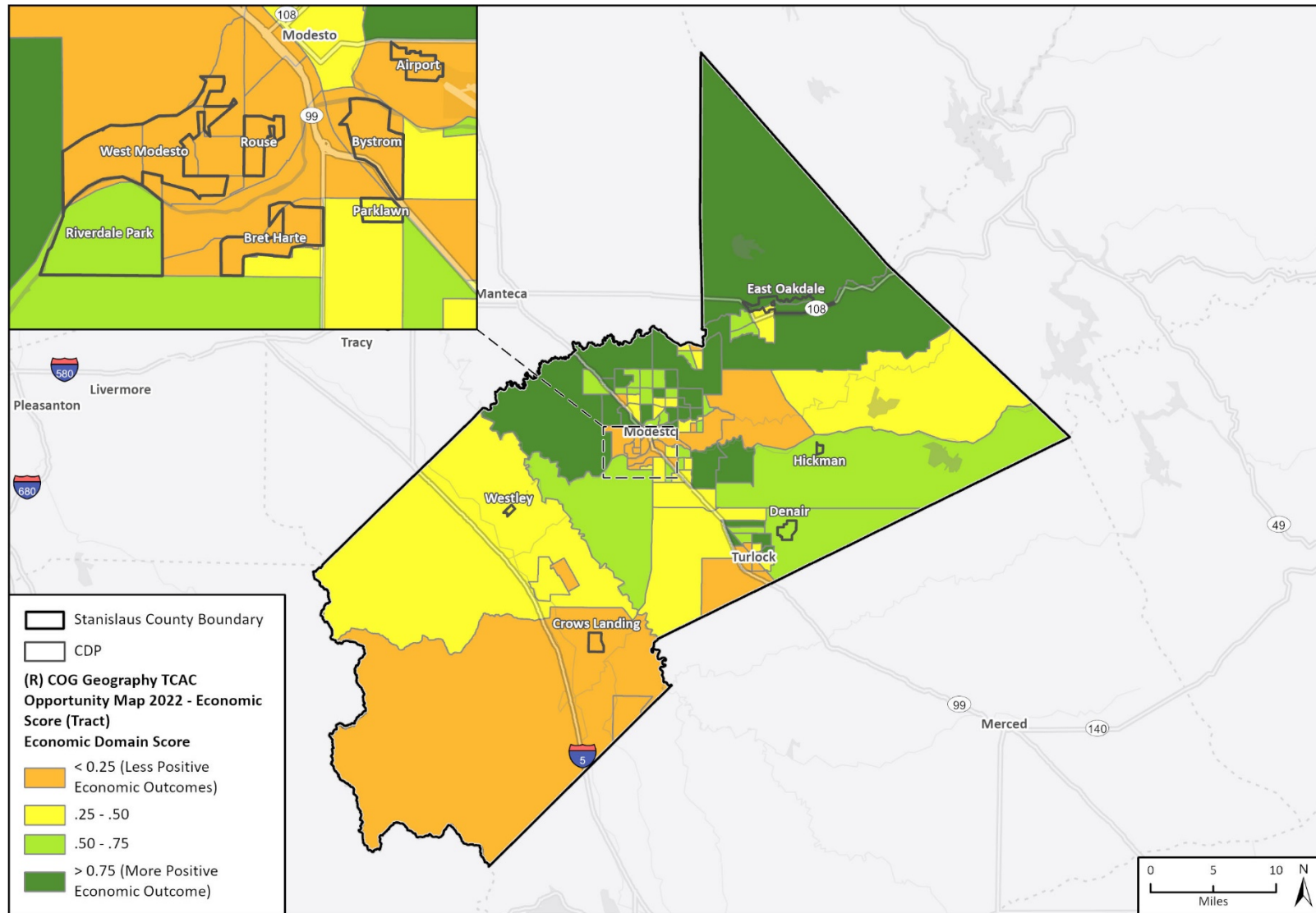
As shown in Figure 3-29, much of the County received the middle range (40 to 60) of possible scores for HUD's jobs proximity index, which means Stanislaus County residents have relatively good access to jobs. There is no clear pattern of disparity associated with race or ethnicity across the county. Within the county, the highest job proximity indices are located within the CDPs of Diablo Grande and part of Salida, due to their proximity employment centers such as Modesto, parts of San Joaquin County, and agriculture. Areas with a lower job proximity score are in the CDPs of Denair, East Oakdale, Orange Blossom, Knights Ferry, and Valley Home with some partially located in the CDPs of West Modesto and Bret Harte.

Areas with more positive economic scores overlap with low job proximity. This can be seen in rural areas of the county which have a higher job proximity score than in city centers, mainly due to job opportunities in agriculture being located in those rural areas.

Regional Comparison

In comparison the Northern San Joaquin Valley, Stanislaus County has a similar distribution in economic opportunity scores and job proximity index. Throughout the region, it appears that the more positive economic scores are in areas surrounding major cities in primarily agriculture zones. Areas with a less positive economic outcome are found within major cities and away from agriculture, as seen in Figure 3-30. This could be attributed to the key role and value that agriculture plays throughout the region. In comparison, a concentration of higher job proximity index scores (score of 80 or higher) is seen within major cities throughout the region, as Figure 3-31 shows. Like Stanislaus County, rural areas of the region have a higher job proximity score than the established cities within the region. This distribution could be credited to the distance rural residents must travel to job centers found in major cities and in agriculture.

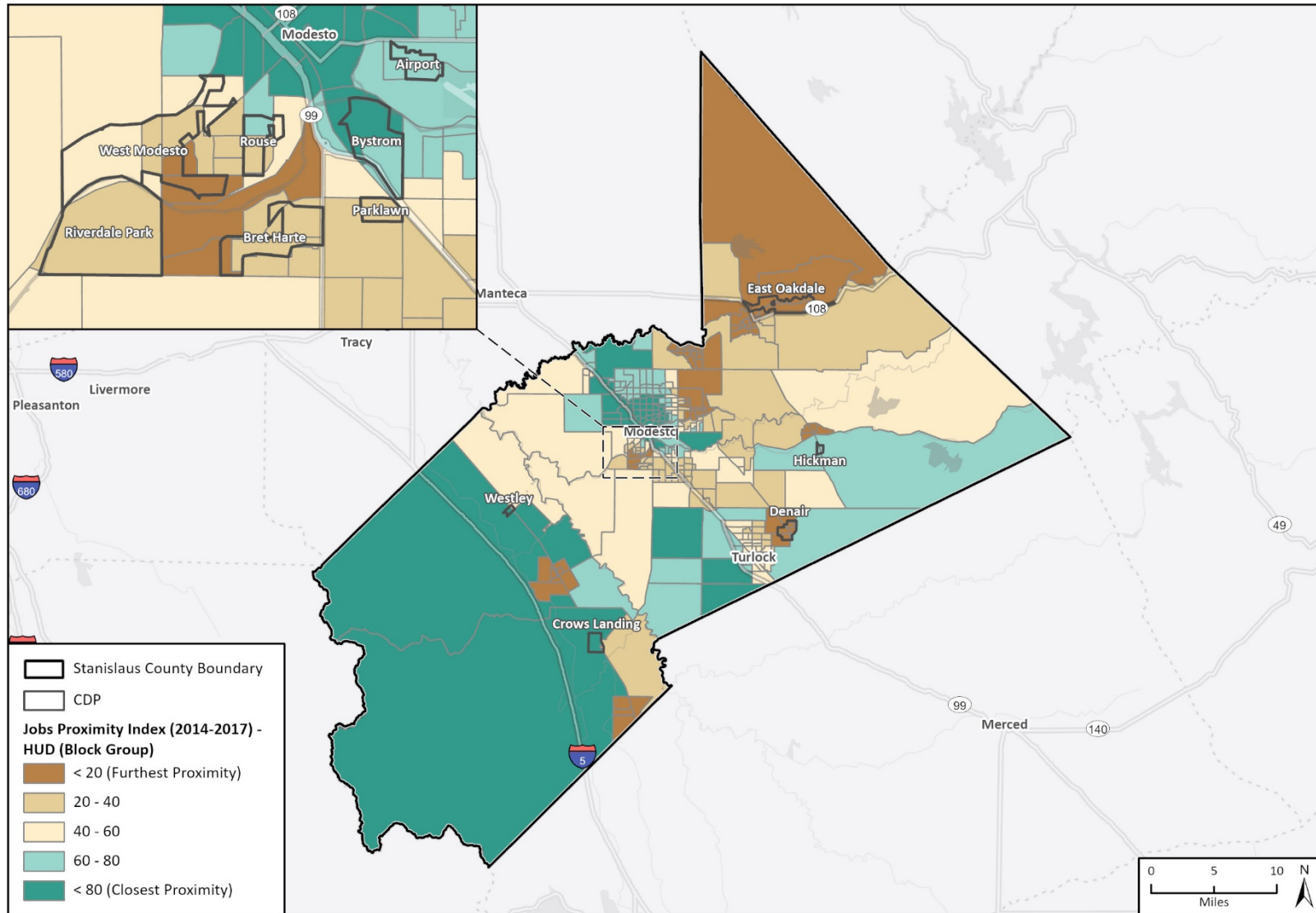
Figure 3-28 TCAC Opportunity Areas – Economic, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

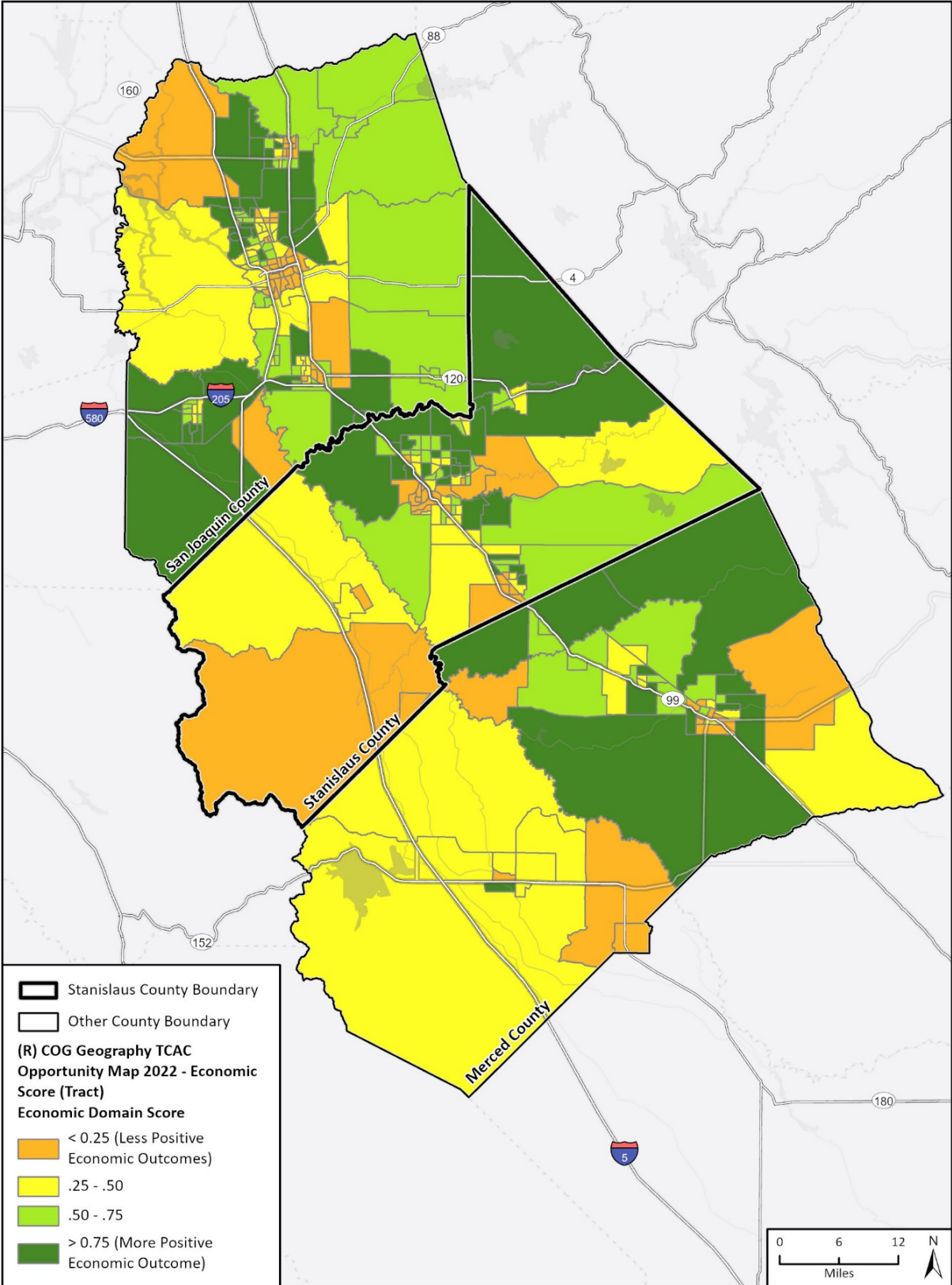
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Figure 3-29 Jobs Proximity Index by Block Group, Stanislaus County



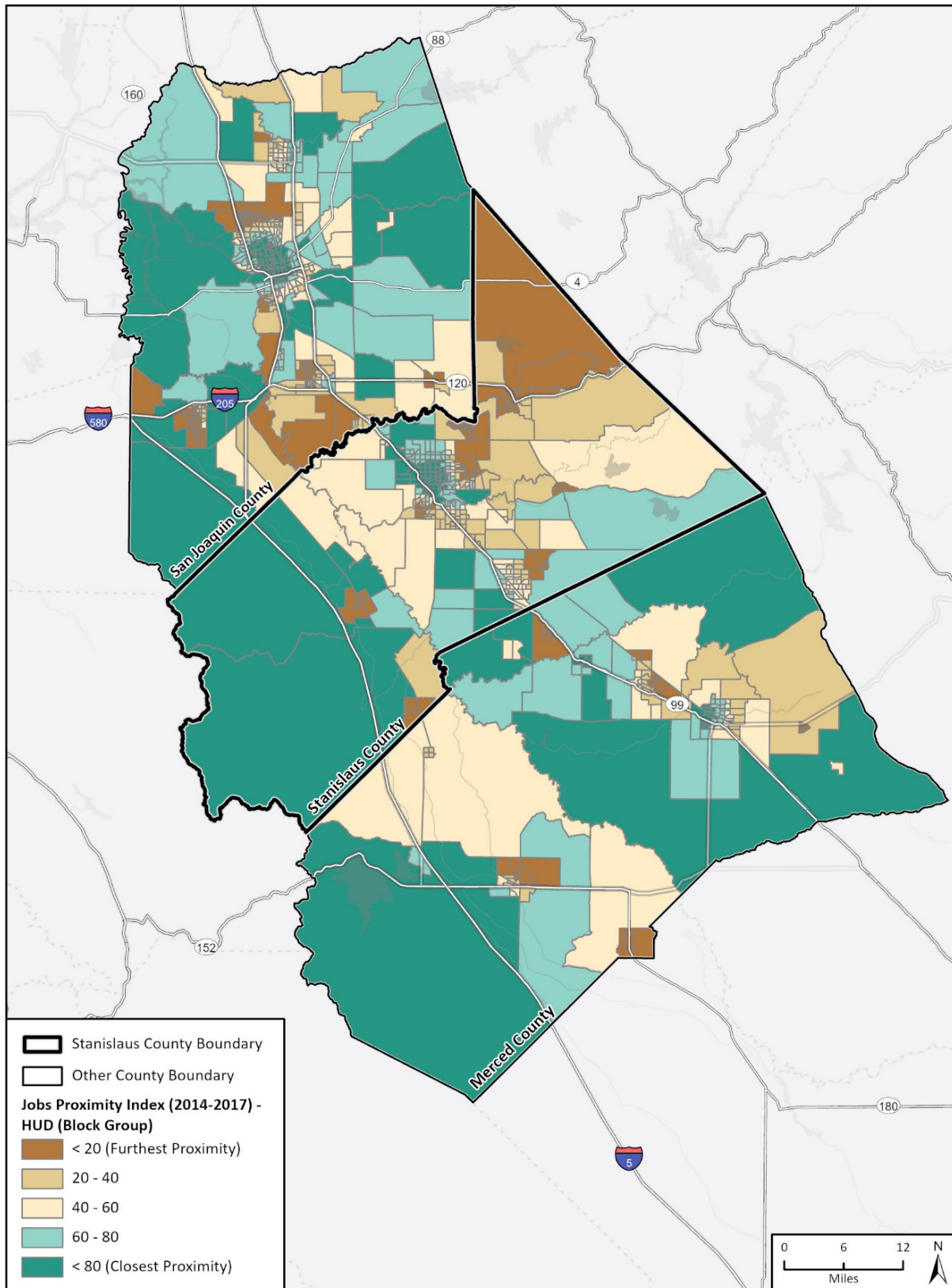
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

Figure 3-30 TCAC Opportunity Areas – Economic Score by Census Tract, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

Figure 3-31 Jobs Proximity Index, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

Educational Opportunity

Studies show that living in high-poverty areas increases exposure to localized risks such as low-quality and underfunded schools which have been shown to contribute to toxic stress, poor physical health, low educational attainment, and impaired cognitive development in children. Low educational outcomes indicate residents are more likely to face a variety of challenges related to educational attainment, such as lower wages and lack of preparation for the workforce. The TCAC and HCD Fair Housing Task Force scored educational outcome based on the following indicators:

- Math proficiency (the percentage of 4th graders who meet or exceed math proficiency standards)
- Reading proficiency (the percentage of 4th graders who meet or exceed literacy standards)
- High school graduation rates (the percentage of high school cohort that graduated on time)
- Student poverty rate (the percent of students not receiving free or reduced-price lunch)

Local Trends

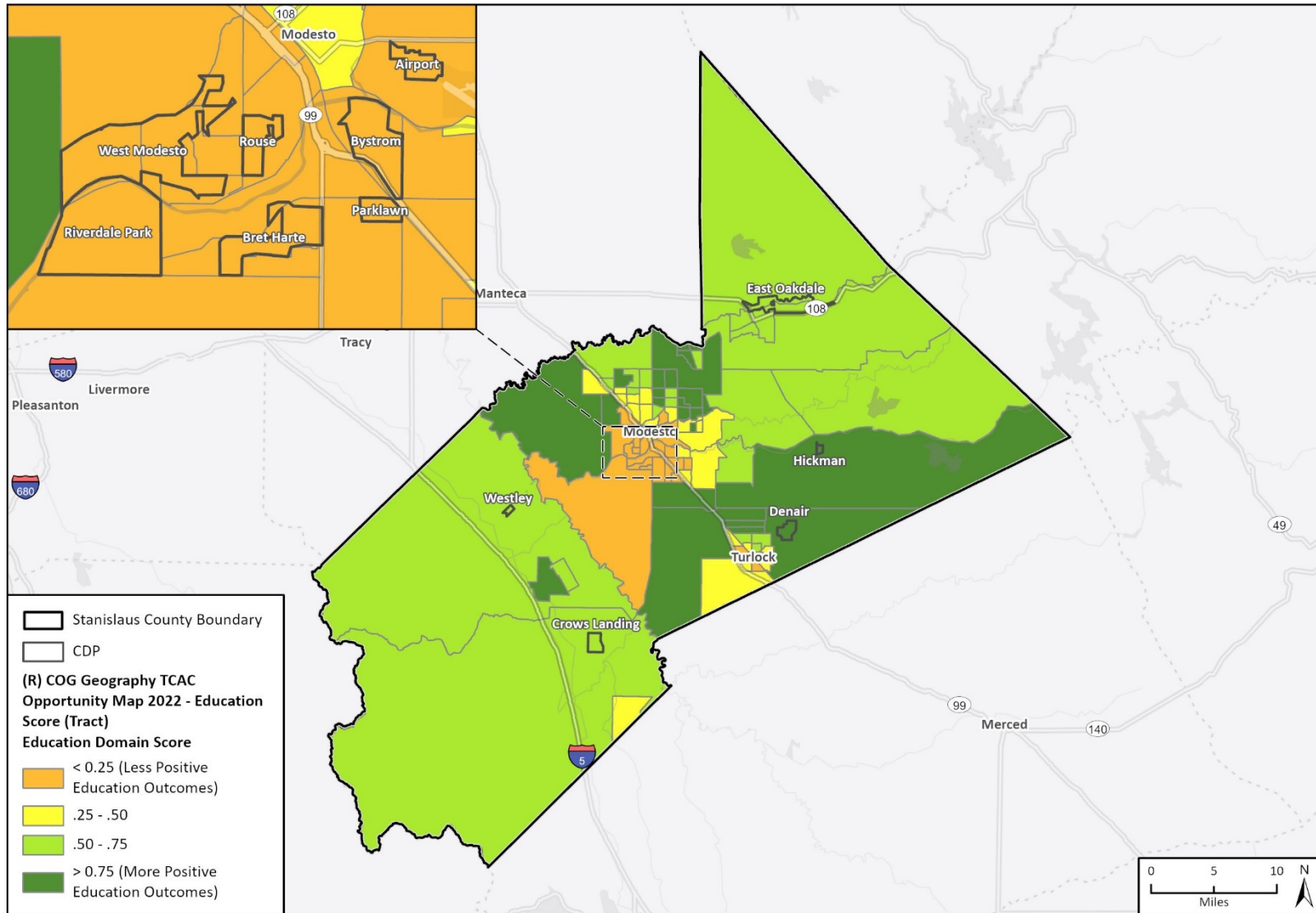
Stanislaus County has significant areas of contrast regarding access to educational opportunities, making this an impediment to fair housing. A concentration of less positive education scores (<0.25) is in and around South Modesto's CDPs, Airport, and West Modesto, as shown in Figure 3-32. Empire and Salida received low scores in the range of 0.25 to 0.5. Most of the northeastern and southwestern areas of the County fall within the more positive scoring range between 0.5-0.75, like in the CDPs around East Oakdale, Westley, and Crows Landing. La Grange, Hickman, Keyes, and Denair are the CDPs that have the most positive education outcomes (0.75 - 1). Areas with less positive education outcomes overlap with areas that are predominantly Hispanic/Latino, have higher poverty rates, and a higher percentage of children living in female-headed households with no spouse present.

According to kidsdata.org, a data compilation program of the Lucile Packard Foundation for Children's Health, Hispanic/Latino (62 percent) and white (24 percent) students comprise the two largest racial/ethnic groups of public school students enrolled in the county. Asian/Pacific Islander students comprise four percent, multiracial students comprise three percent, and Black/African American students comprise two percent of student enrollment. The overall high school graduation rate in the county is 85 percent. High school graduation rates are highest among Filipino (95 percent), Asian (93 percent), and Native Hawaiian/Pacific Islander students (92 percent), while Black/African American (75 percent) and American Indian/Alaska Native students (79 percent) had the lowest high school graduation rates.

Regional Comparison

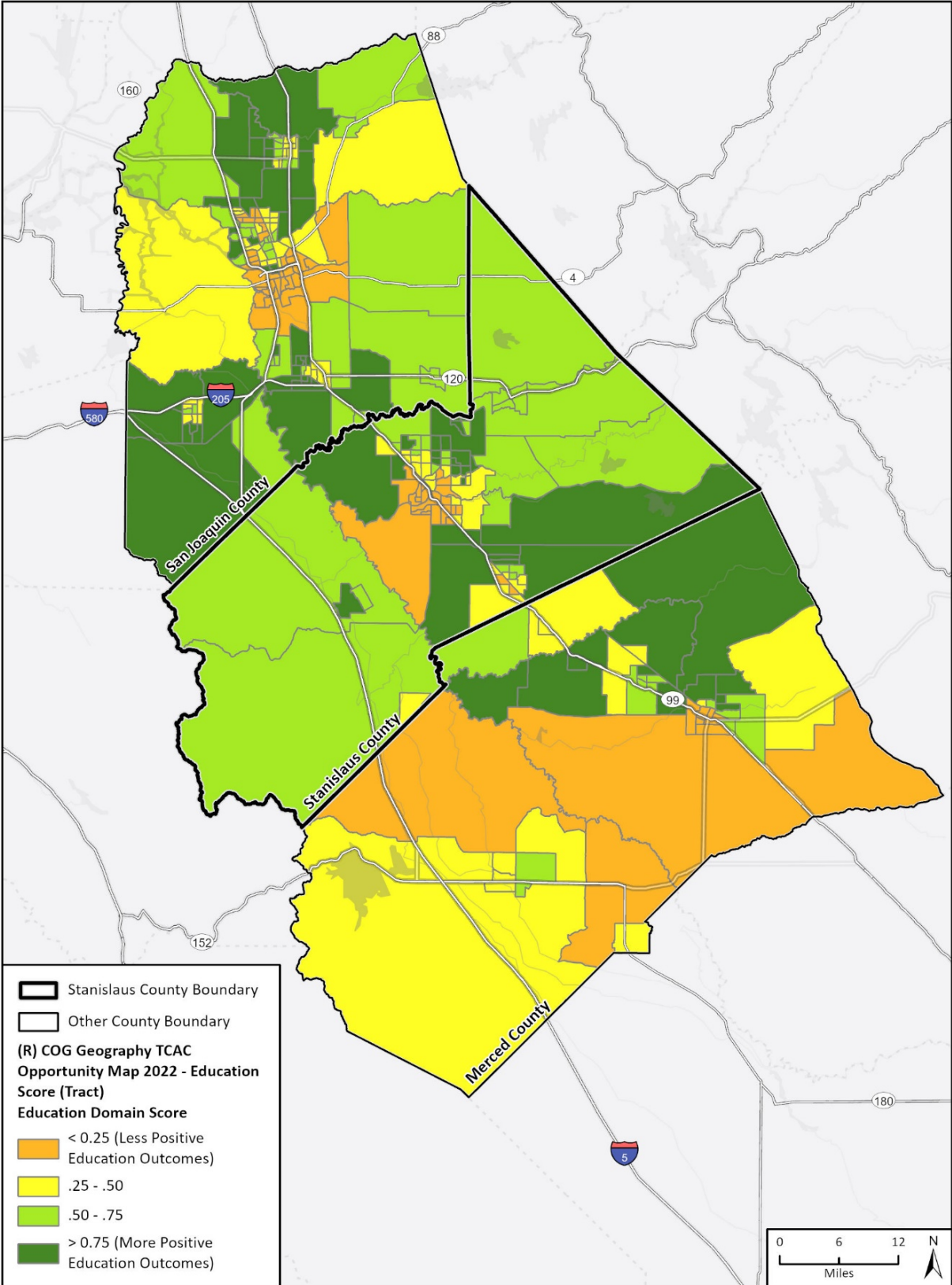
Similar to Stanislaus County, the region varies in its educational domain score as seen in Figure 3-33. Regionally, areas with the more positive educational outcomes are in more rural areas surrounding city centers, whereas the less positive educational outcomes are in and around city centers.

Figure 3-32 TCAC Opportunity Area – Education Score, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-33 TCAC Opportunity Area – Education Score by Census Tract, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

Healthy Environment

The environmental outcome score is based on the CalEnviroScreen Environmental Effect Indicator Tool, which measures the extent to which toxic compounds and hazardous sites are present in a community. TCAC and HCD measured environmental opportunity using the exposure, pollution burden, and environmental effect indicators used in CalEnviroScreen 4.0, a web-based tool developed by California's Office of Environmental Health Hazard Assessment. CalEnviroScreen 4.0 is a statewide risk assessment tool that measures the cumulative impacts of multiple sources of pollution.

Local Trends

Stanislaus County has an overall moderate to less positive environmental score. As shown in Figure 3-34, positive scores (0.75-1.0) were given to the CDPs of Crows Landing, East Oakdale, Orange Blossom, Knights Ferry, and Valley Home. Brett Harte and West Modesto have a relatively high environmental score of 0.50-0.75. All other CDPs fall within the lower range of environmental scoring between 0.5 and less than 0.25. CDPs west of Highway 99 have the lowest positive environmental outcome of less than 0.25, whereas CDPs east of the highway vary from 0.25 to 0.5, to less than 0.25.

The CalEnviroScreen map for Stanislaus County identifies the degree to which communities are considered burdened by pollution. Stanislaus County has a range of CalEnviroScreen scores, with percentile scores ranging from the 38th to the 100th percentile (Figure 3-35). Overall, pollution burden is highest in the western portion of the county and lowest in parts of the cities of Modesto, Patterson, and Turlock. Pollution burden due to drinking water contaminants, pesticide use, groundwater threats, and proximity to solid waste sites is high throughout the county. Western parts of the county, specifically areas surrounding and west of the San Joaquin River, have high levels of pollution burden due to proximity to cleanup sites and impaired waters. In addition to high levels of pollution burden, residents in western parts of the county have a high prevalence of population characteristics that make people more vulnerable to pollution, including low educational attainment levels, high poverty rates, and high unemployment rates.

The California Environmental Protection Agency defines Senate Bill (SB) 535 disadvantaged communities as census tracts that meet any the following criteria:

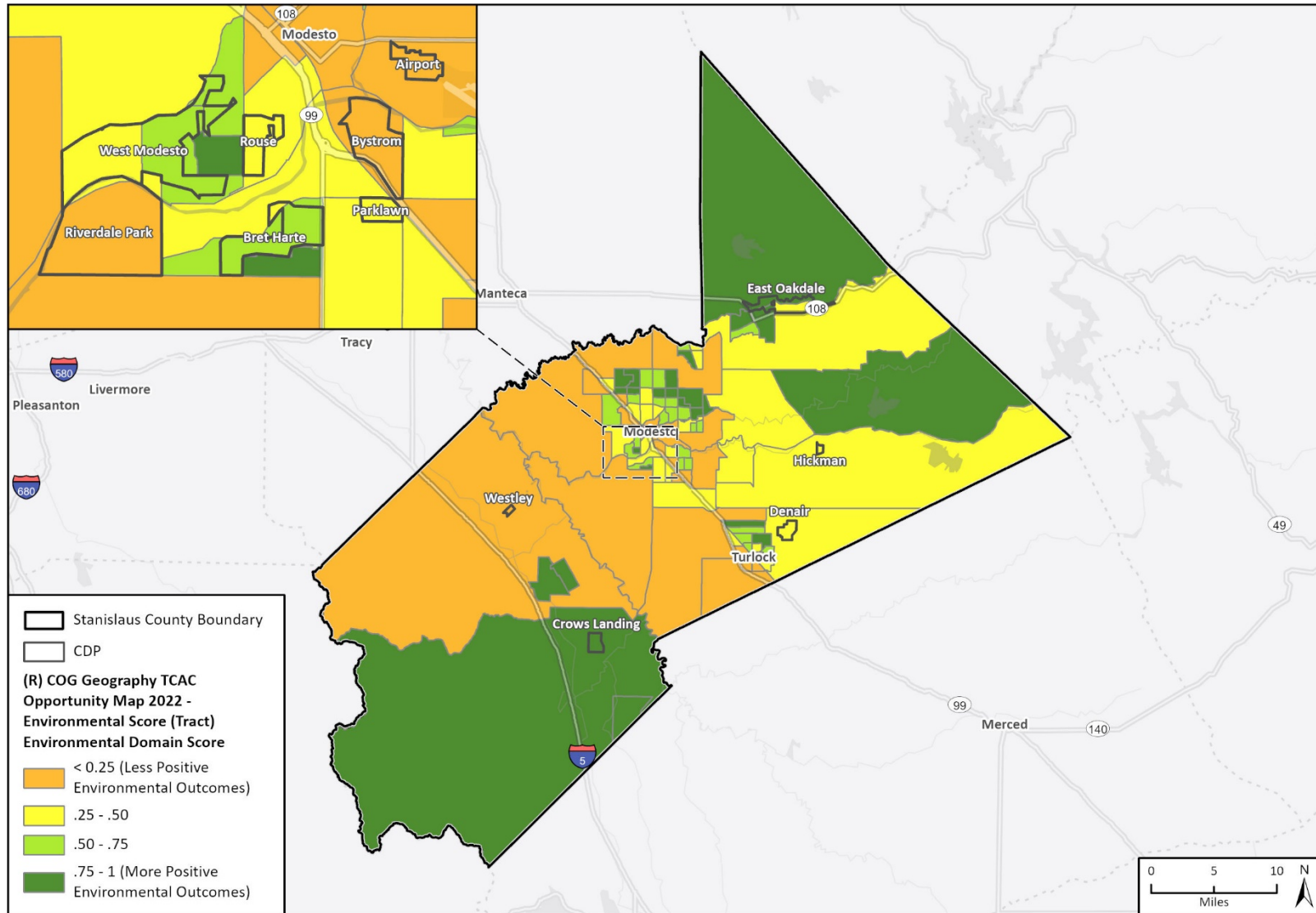
- Census tracts with the highest 25 percent of CalEnviroScreen percentile scores
- Census tracts lacking overall scores in CalEnviroScreen due to data gaps, but receiving the highest five percent of CalEnviroScreen cumulative pollution burden scores
- Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen
- Lands under the control of federally recognized Tribes

SB 535 disadvantaged communities are generally low-income and are disproportionately burdened by pollution. These communities are targeted for investment from proceeds of the State's Cap-and-Trade Program. Those funds are intended to improve public health, quality of life and economic opportunity, and reduce pollution that causes climate change. Most of the western half of Stanislaus County is considered a SB 535 disadvantaged community, including the entirety of the city of Patterson and the western parts of Modesto, Turlock, and Keyes (Figure 3-36). Parts of Oakdale, Riverbank, Waterford, and Empire are also disadvantaged communities. SB 535 disadvantaged communities heavily overlap areas that are predominantly Hispanic/Latino and overlaps with areas with higher percentages of LMI residents and less positive economic outcomes.

Regional Comparison

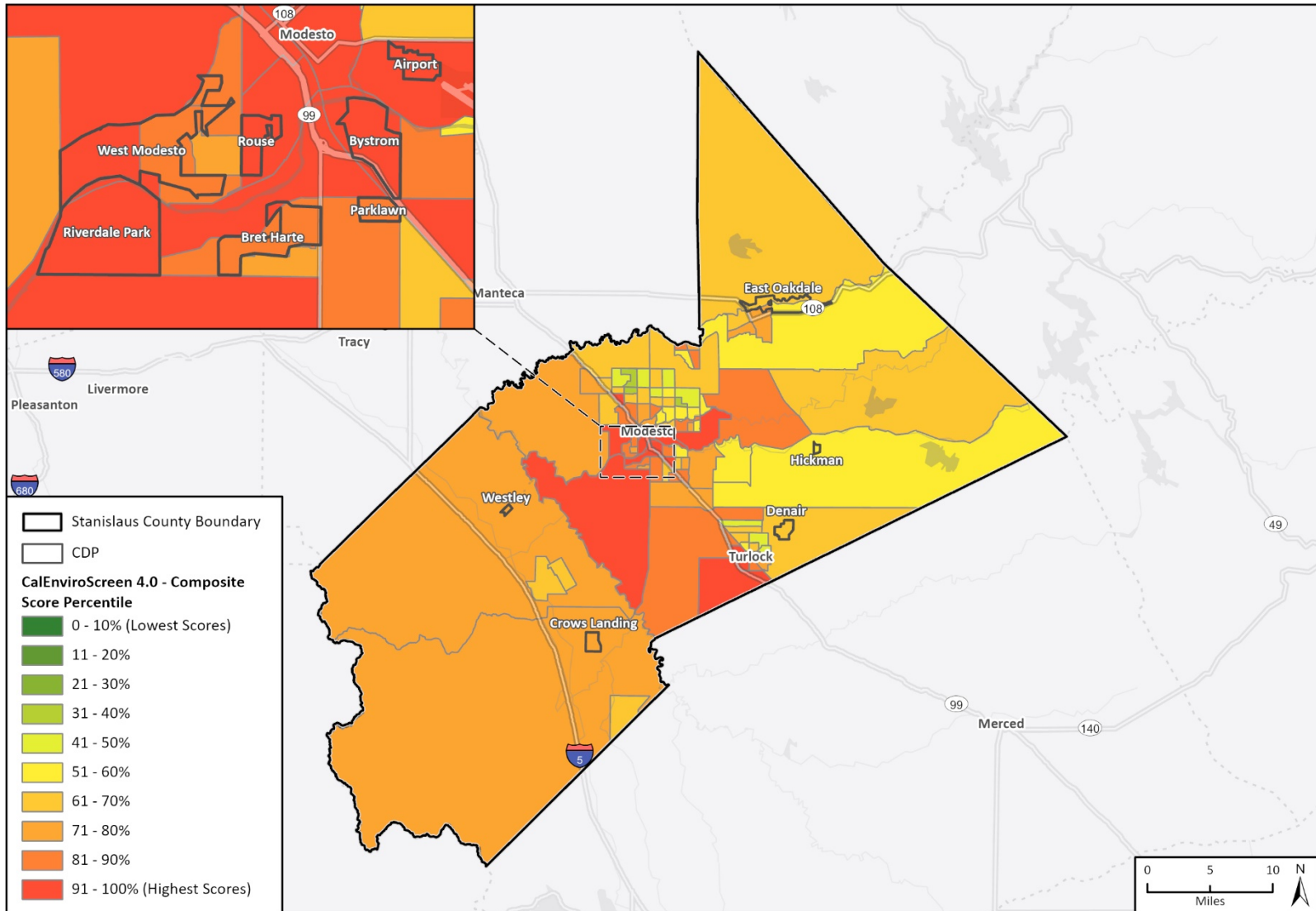
Stanislaus County compares similarly to the region in its distribution of environmental domain scores. In areas where agriculture is more prominent, environmental scores are worse throughout the region as seen in Figure 3-37. Areas with a more positive score vary from within city centers and in the mountainous areas of the region.

Figure 3-34 TCAC Opportunity Area – Environmental Score, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

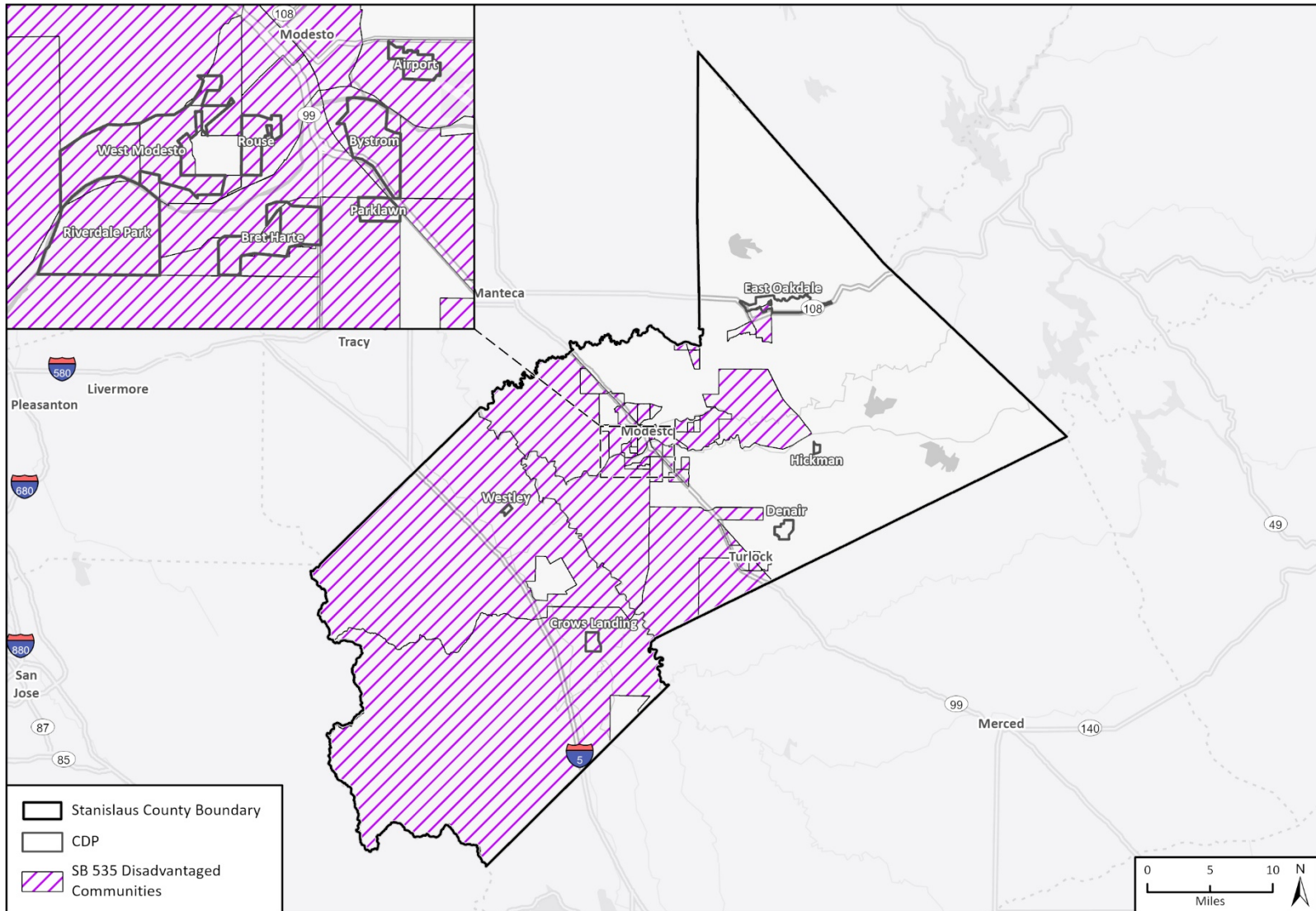
Figure 3-35 CalEnviroScreen 4.0 Percentile Scores, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021.

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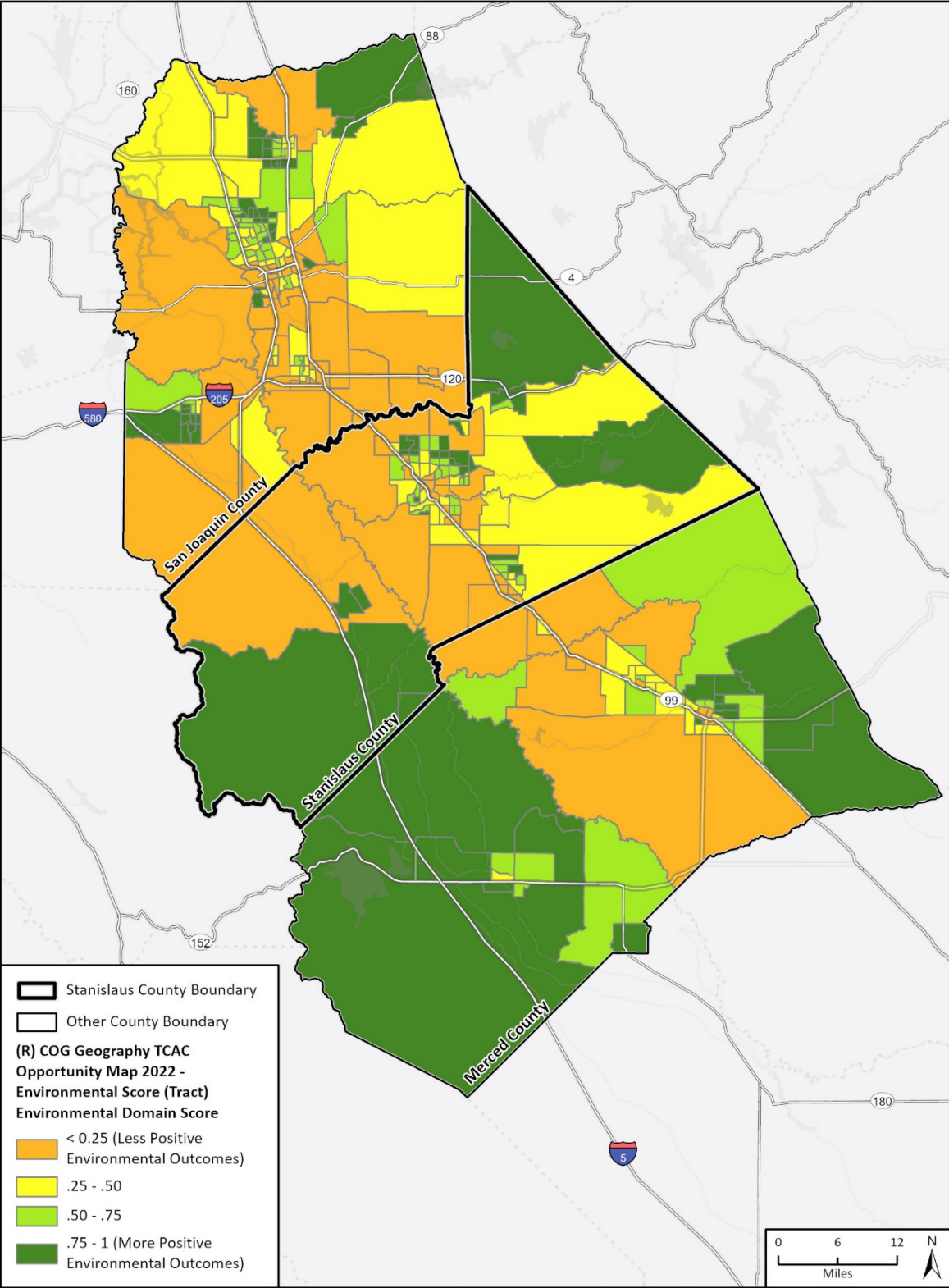
Figure 3-36 SB 535 Disadvantaged Communities, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021.

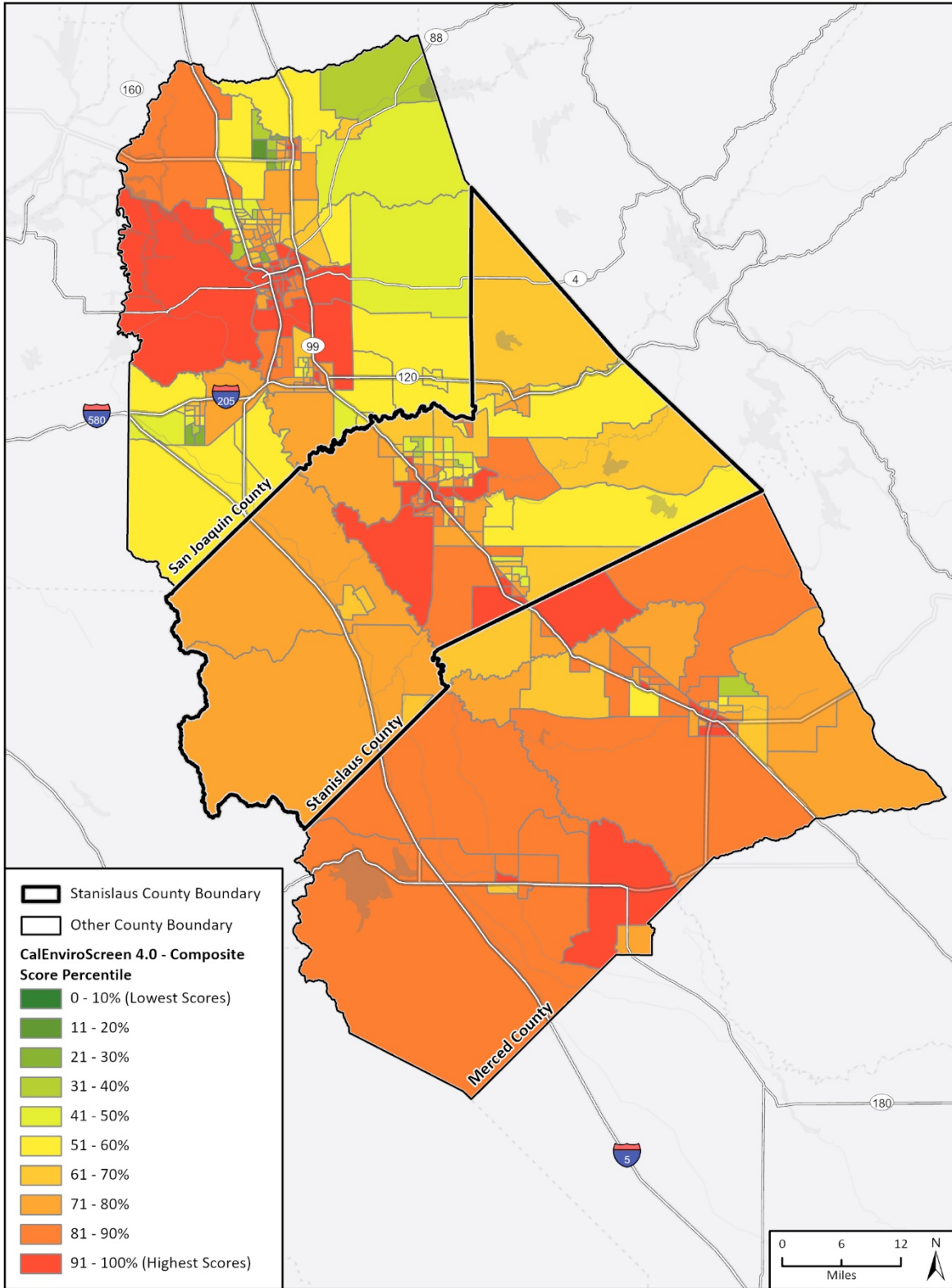
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AFFH - County

Figure 3-37 TCAC Opportunity Area – Environmental Score by Census Tract, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-38 CalEnviroScreen 4.0 Percentile Scores, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021. 21_12095_HE_AFFH AFFH - Regional

3.11.3 Access to Transportation and Location Affordability Index

Access to transportation is measured through AllTransit Metrics. AllTransit has developed a Performance Score which looks at overall connectivity, access to jobs, frequency of service, and the percentage of commuters who use transit to travel to work. The performance score is measured from 0 to 10, with 10 being the highest level to achieve for transit performance. HUD and the Department of Transportation (DOT) have developed the Location Affordability Index which provides household and transportation cost estimates at the census tract level. The index captures the interrelationship of auto ownership, housing costs, and transit usage for both homeowners and renters. The index also considers block density, local job density, and number of households per total acres, as dense development is typically a better environment for walkability and can result in lower transportation expenses.

Local Trends

Stanislaus County has an AllTransit Performance Score of 3.6, meaning that there is a low combination of trips per week and a low number of accessible jobs, enabling few people to take transit to work.¹⁵ On average, only 0.84 percent of commuters use transit in the county, which could be due to the low number of transit routes available. However, 73.5 percent of households live within a half-mile of transit and 71.4 percent of jobs are located within a half-mile of transit.

High quality transit stops are defined by state law as those with an existing rail or bus rapid transit station, ferry terminal served by either a bus or rail transit service, or with an intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. In Stanislaus County, high quality transit stops are concentrated in urban areas within the cities of Modesto, Ceres, Turlock, and Patterson (Figure 3-39). Unincorporated parts of the county, including communities adjacent to incorporated cities, generally do not have any high quality transit stops. Community feedback also indicated that access to transit is unreliable in unincorporated parts of the county.

Based on the Location Affordability Index provided by HUD and DOT Stanislaus County, many renters cannot afford greater rents than \$1,000 a month when considering transportation related costs. As shown in Figure 3-40, renters with greater economic opportunity who live nearby city centers can afford greater median gross rents than those renters who are located further from the city centers and thus job opportunities.

Transit and jobs are not accessible throughout the county, and are more accessible in more densely developed areas, as indicated by AllTransit score. When transportation costs are added to affordability, those who can afford less rent can expect to pay greater costs related to transportation. Typically, these areas are within the CDPs in rural agricultural areas, rural foothill, and mountainous areas, because of longer commutes and thereby increased transportation costs such as fuel, and vehicle maintenance.

Regional Trends

Comparing Stanislaus County's AllTransit score to the region, Stanislaus County has the highest performance score leading slightly ahead of San Joaquin County at 3.0 and Merced County at 2.4. However, in the other counties there is a higher percentage of commuters who use transit that have

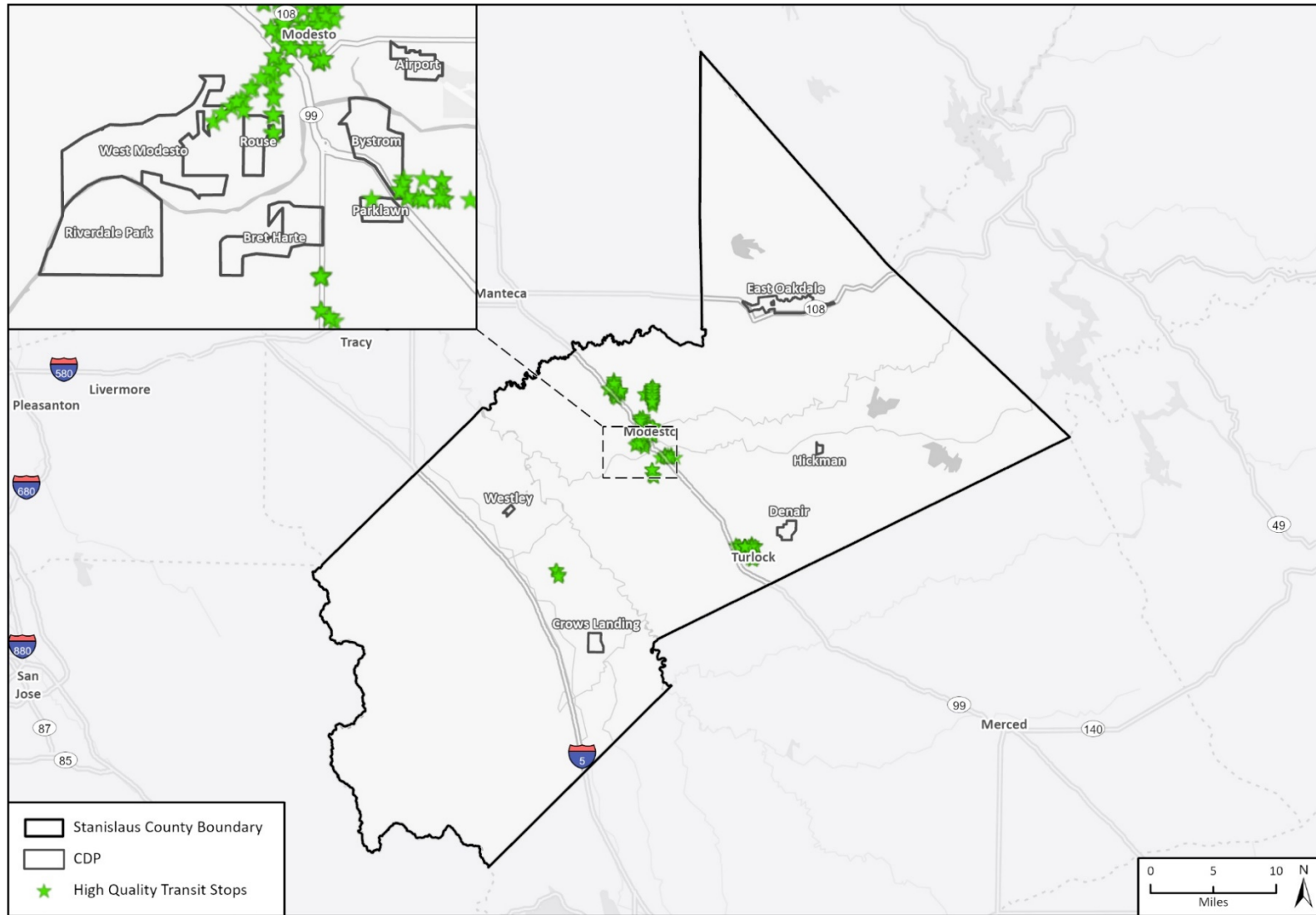
¹⁵ AllTransit Metrics, Stanislaus County, CA. <https://alltransit.cnt.org/metrics/?addr=modesto#ma>

access to a similar number of transit routes. This indicates that there are more residents commuting within the other counties in the region.

Similar to Stanislaus County, high quality transit stops in the rest of the Northern San Joaquin Valley are located in urban areas, primarily in the cities of Stockton and Merced (Figure 3-10).

Stanislaus County has a relatively moderate location affordability index compared to the region. As illustrated in Figure 3-41, Stanislaus County has more areas where renters cannot afford greater rents than \$1,500 a month than Merced County, but fewer areas compared to San Joaquin County. Throughout the region, renters near the city centers can afford rents of higher monthly costs when considering transportation costs, as they are expected to spend less on transportation costs.

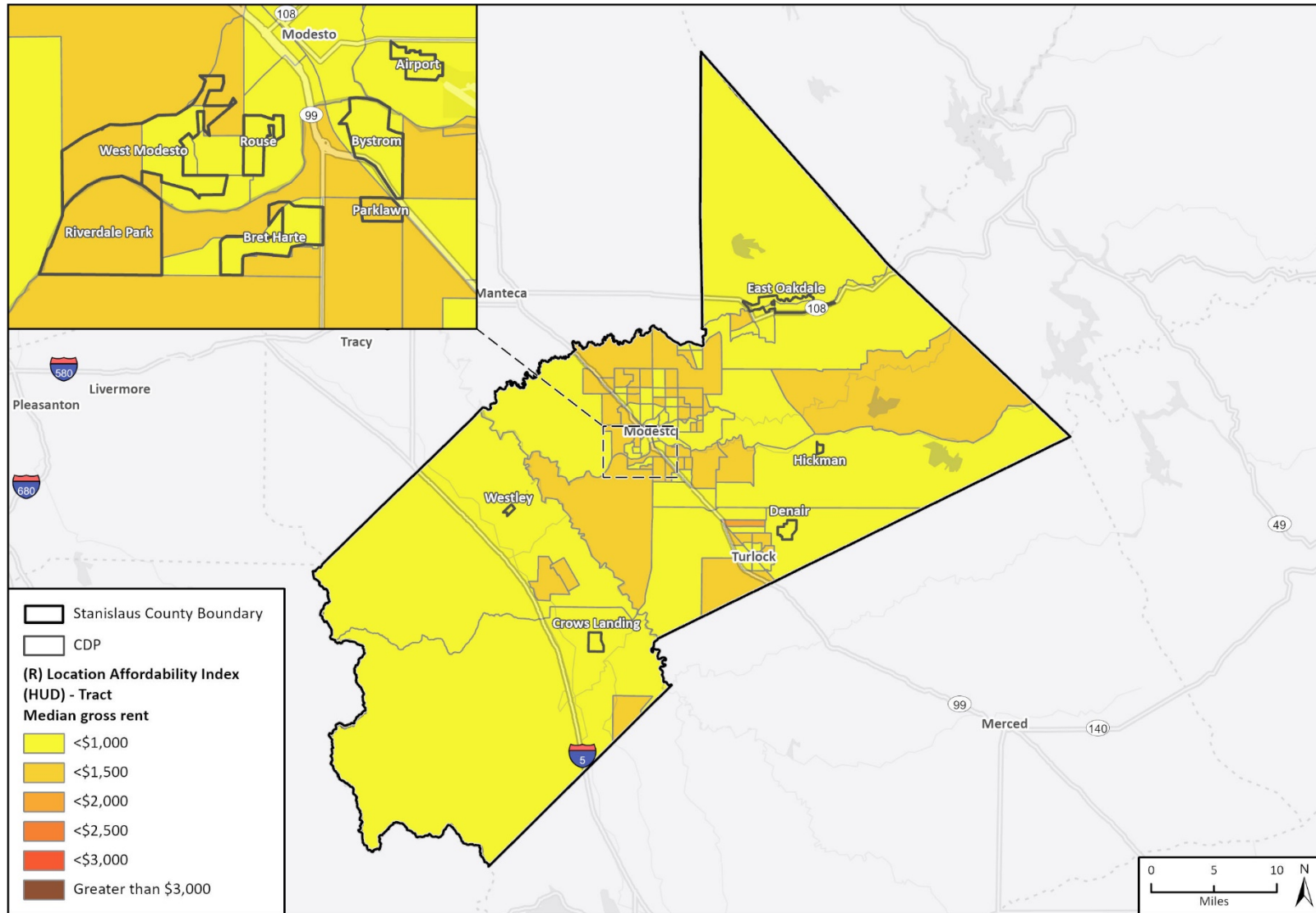
Figure 3-39 High Quality Transit Stops, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021.

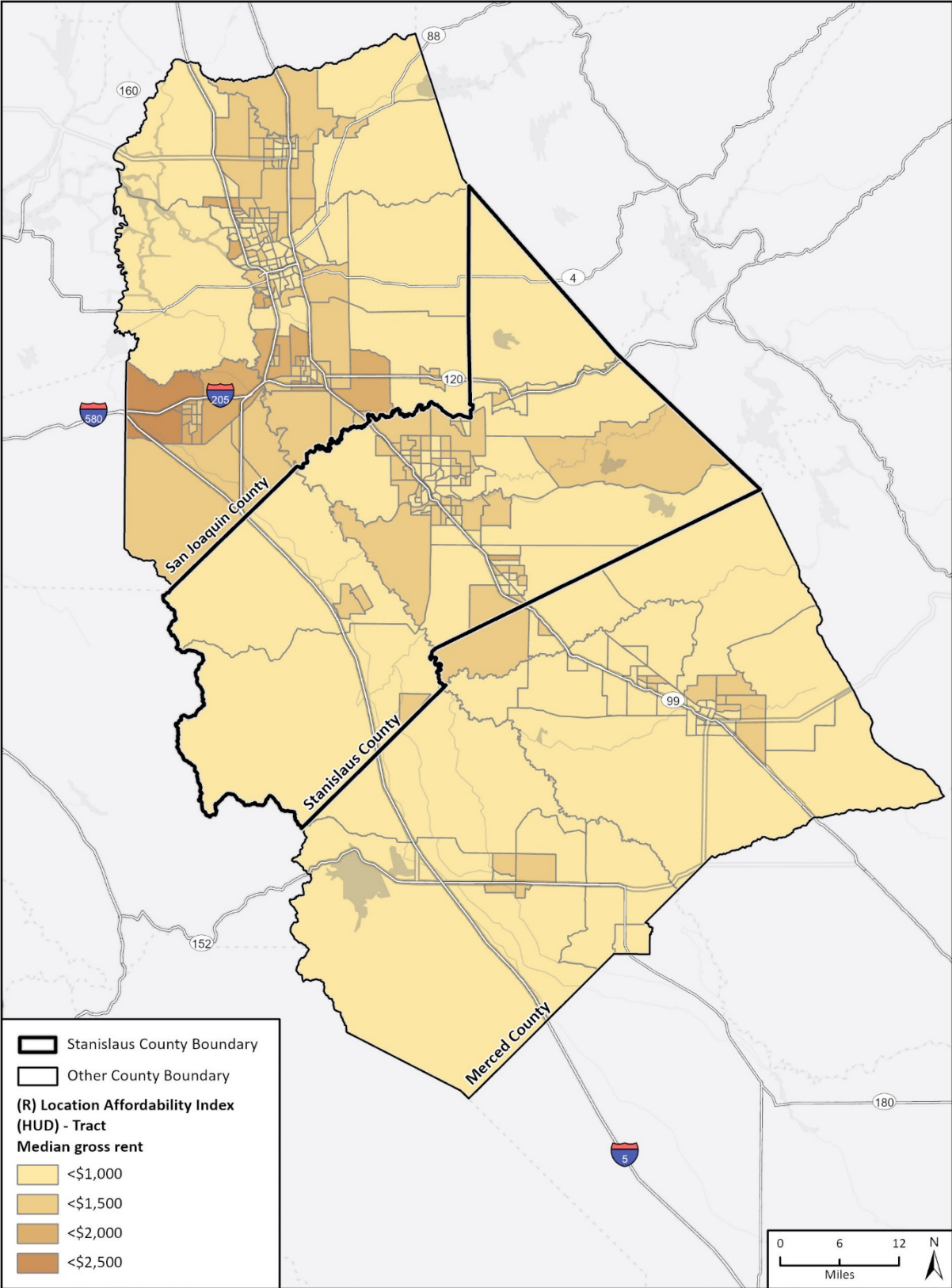
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Figure 3-40 Location Affordability Index (HUD), Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-41 Location Affordability Index (HUD), Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

3.12 Disproportionate Housing Needs

Disproportionate housing needs refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing some type of housing need. To analyze the extent of disproportionate housing needs in Stanislaus, this section reviews data on types of housing needs: housing cost burden and severe housing cost burden overcrowding, homelessness, and substandard housing conditions.

3.12.1 Overpayment

Housing is generally the greatest single expense for California families. The impact of high housing costs falls disproportionately on extremely low-, very low-, and low-income households, especially renters. Individuals who overpay on housing frequently have insufficient money left for other critical essentials, including food, medicine, and educational costs. These individuals are described as “cost burdened” which refers to a large fraction of a household’s total gross income spent on housing costs alone. There are two levels of cost burden: (1) “Cost Burden” refers to the households for which housing cost burden is greater than 30 percent of their income; and (2) “Severe Cost Burden” refers to households paying 50 percent or more of their income for housing.

Local Trends

Throughout the County, the percentage of renter households whose gross rent (contract rent plus tenant-paid utilities) is 30 percent or more of the household income is concentrated in urban areas and is higher within the South Modesto CDPs. In Rouse, Bystrom, and Bret Harte 60 to 80 percent of households overpay rent, as seen in Figure 3-42. Bystrom and Rouse are also affected by overpayment for owner households where mortgages cost more than 30 percent of the household income. Westley, Grayson, and Diablo Grande are also affected, with 40 to 60 percent of owner households overpaying, as Figure 3-43 shows. In contrast to overpayment by renters, overpayment by homeowners is prevalent in urban and rural parts of the county. Most areas with a high degree of overpayment by renters are predominantly Hispanic/Latino and overlap. Areas with high rates of overpayment by renters and homeowners heavily overlap with areas with higher poverty rates.

Stanislaus County shows similar trends in overpayment to the state. As shown in Table 3-11, 27 percent of all owner households and 48 percent of renter households were overpaying for housing in Stanislaus County in 2019. These findings are similar to the population of households overpaying statewide (30 percent among owners; 50 percent among renters). When looking at cost burden by income category, Stanislaus County and California follow similar trends. Table 3-12 shows that 68 percent of lower-income households in Stanislaus County are cost burdened and 36 percent are severely cost-burdened. Almost identically, the statewide lower-income households rate is 66 percent cost burdened and 37 percent severely cost burdened. In both areas, very few above-moderate income households are overpaying for housing.

Table 3-11 Overpaying Households

Cost Burden	Stanislaus County		California	
	Owner	Renter	Owner	Renter
Not-Overpaying (Cost Burden <=30%)	73%	50%	70%	48%
Cost-Burdened (Cost Burden >30% to <=50%)	17%	23%	17%	24%
Severely Cost-Burdened (Cost Burden >50%)	10%	25%	13%	26%
Cost Burden not available	1%	1%	1%	2%

Source: HUD, CHAS data 2015-2019.

Table 3-12 Cost Burdened Households by Income Category (Renters and Owners)

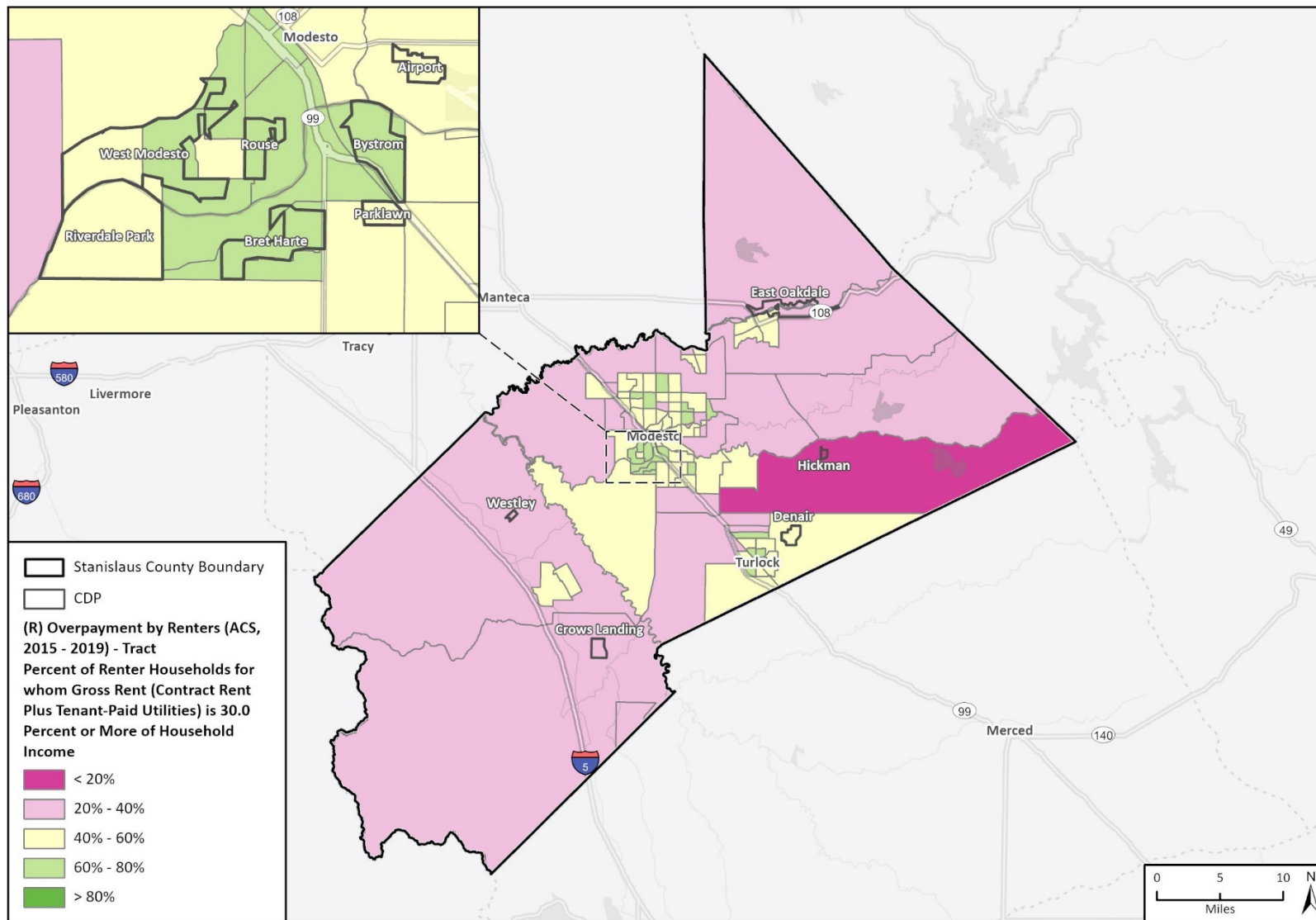
	Stanislaus County		California		
	Total	Cost Burden > 30%	Percent of Total	Cost Burden > 50%	Percent of Total
Stanislaus County					
Household Income <= 30% HAMFI	20,435	16,170	79%	13,540	66%
Household Income >30% to <=50% HAMFI	22,095	16,635	75%	9,230	42%
Household Income >50% to <=80% HAMFI	31,030	17,120	55%	3,940	13%
Lower Incomes Combined	73,560	49,925	68%	26,710	36%
Household Income >80% to <=100% HAMFI	17,665	5,130	29%	725	4%
Household Income >100% HAMFI	82,670	7,040	9%	855	1%
Total	173,895	62,095	36%	28,290	16%
California					
Household Income <= 30% HAMFI	2,196,535	1,729,390	79%	1,419,570	65%
Household Income >30% to <=50% HAMFI	1,744,725	1,249,440	72%	604,010	35%
Household Income >50% to <=80% HAMFI	2,261,805	1,107,010	49%	286,875	13%
Lower Incomes Combined	6,203,065	4,085,840	66%	2,310,455	37%
Household Income >80% to <=100% HAMFI	1,314,120	410,145	31%	61,315	5%
Household Income >100% HAMFI	5,527,075	563,860	10%	55,885	1%
Total	13,044,265	5,059,845	39%	2,427,655	19%

Source: CHAS data 2015-2019

Regional Comparison

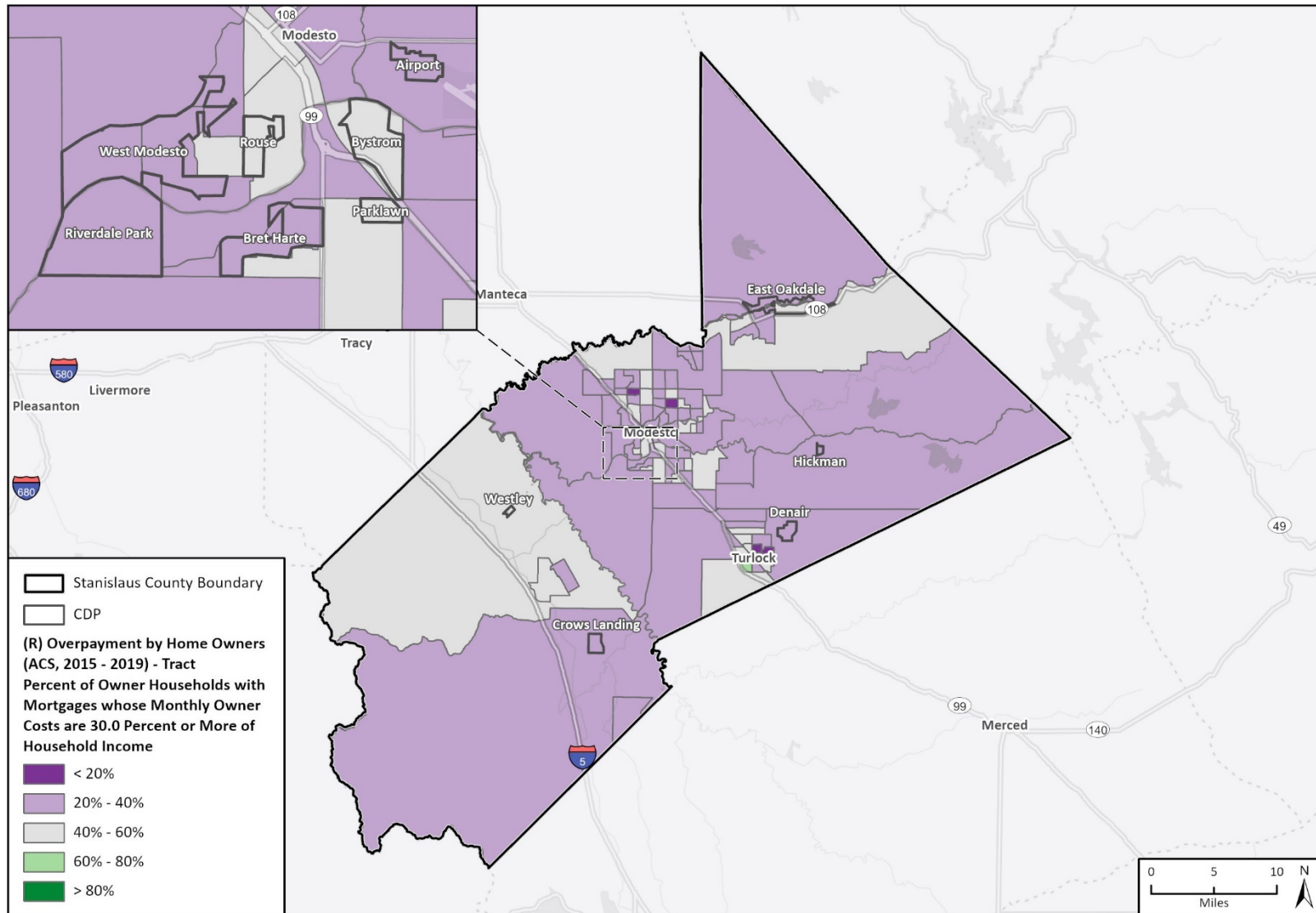
In comparison to the Northern San Joaquin Valley, Stanislaus County has a similar distribution of households who overpay for rent and mortgages. Throughout the region most overpayment for renters is occurring in major cities, as shown in Figure 3-44. Distribution of owners overpaying for mortgages is slightly higher in the other counties compared to Stanislaus, where a larger number of households fall within the 60 to over 80 percent overpayment range (Figure 3-45).

Figure 3-42 Overpayment by Renters, Stanislaus County



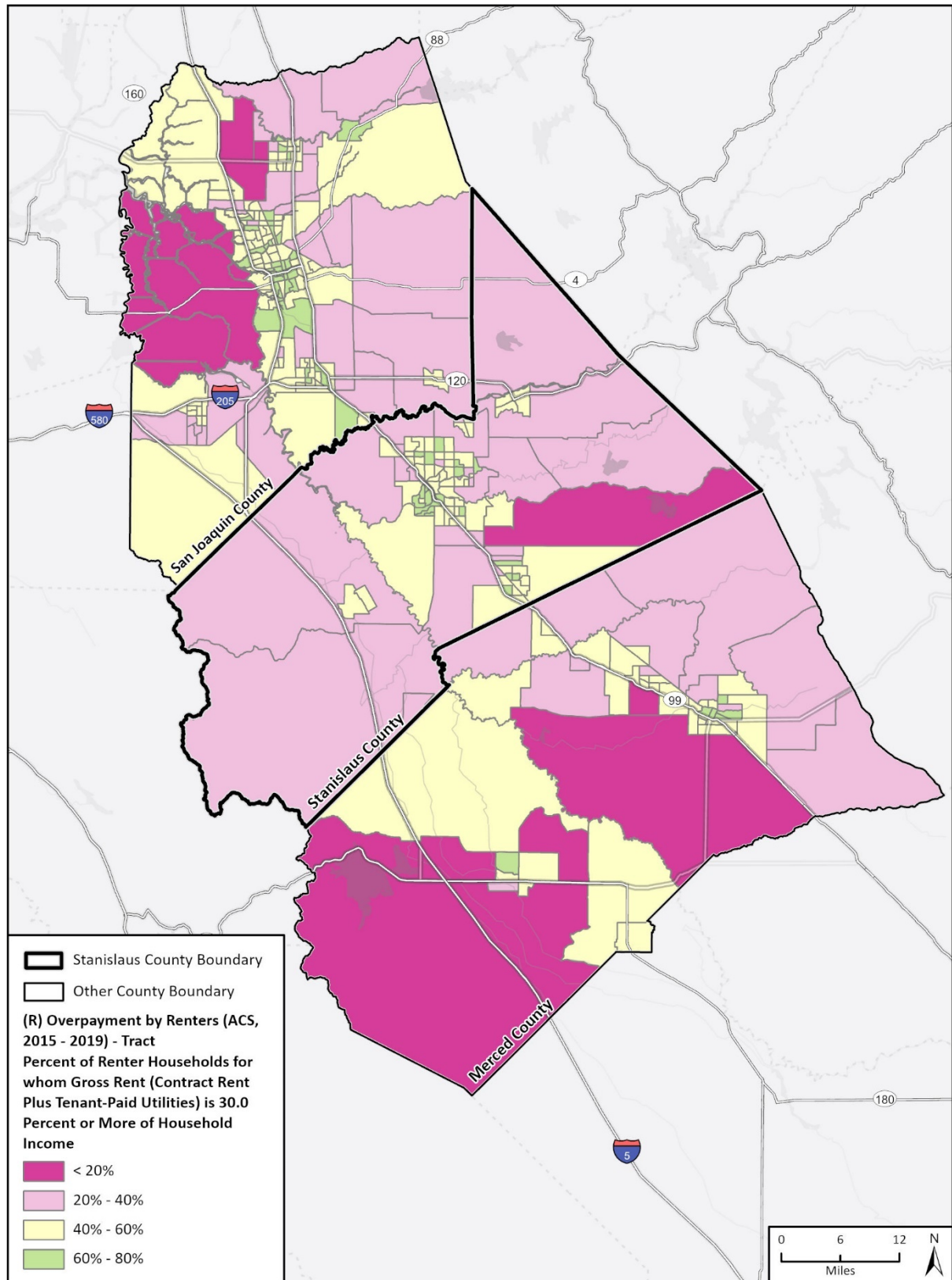
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

Figure 3-43 Overpayment by Home Owners, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

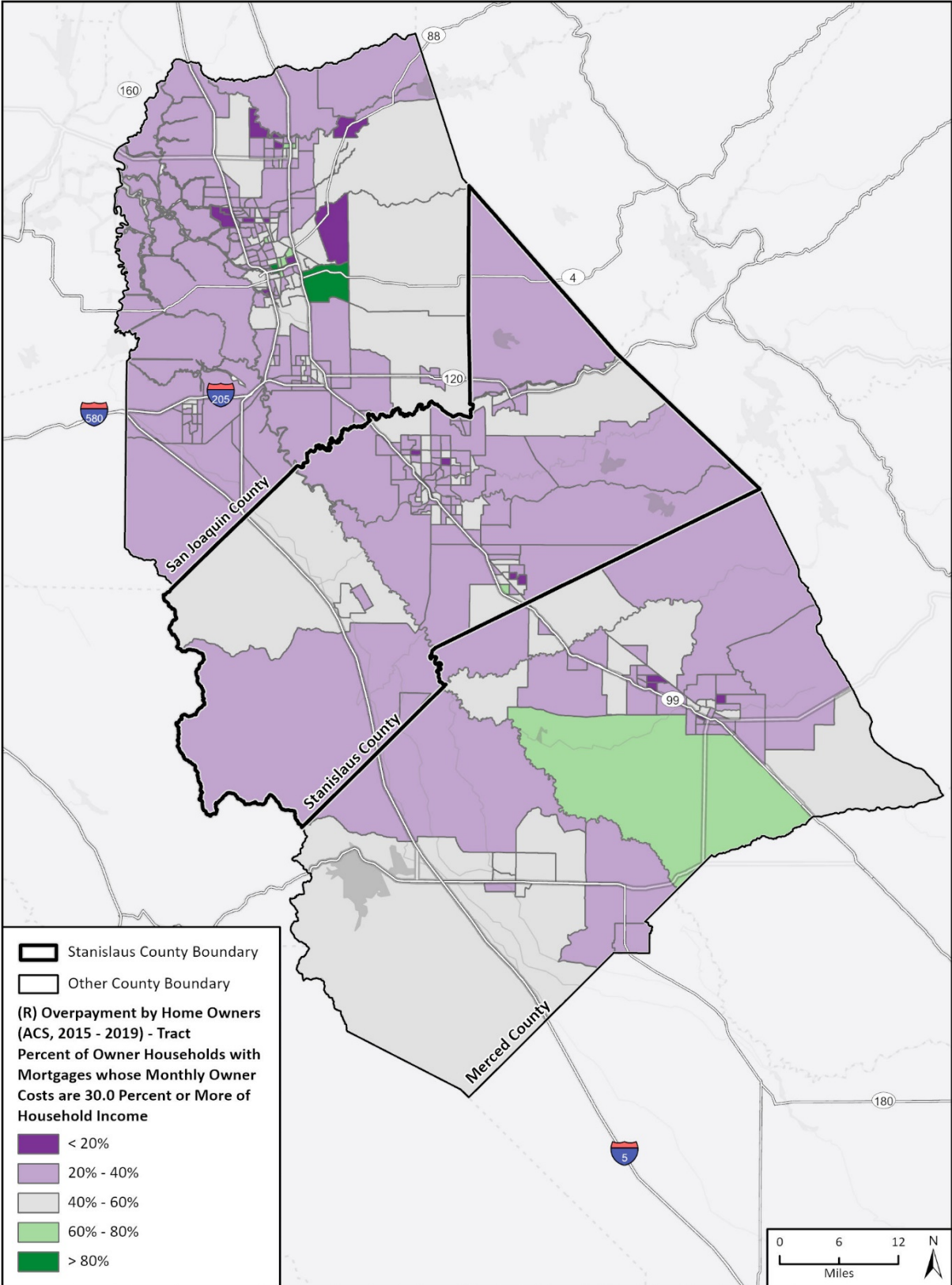
Figure 3-44 Overpayment by Renters, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

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Figure 3-45 Overpayment by Home Owners, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

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3.12.2 Overcrowding

Overcrowding is defined as a condition in which a housing unit is occupied by more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). Severe overcrowding refers to more than 1.5 persons per room. Overcrowding is reflective of various living situations: a housing unit is inadequately sized to meet a household’s needs; the necessity or desire to have extended family members reside in an existing household; or unrelated individuals or families share a single housing unit.

Large families generally have special housing needs due to lower per-capita household income, and the need for larger units with three or more bedrooms, which can be expensive and hard to find, resulting in families renting smaller units and living in overcrowded conditions. Large lower-income households may not be able to pay more for larger housing and instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding.

According to interviews with local fair housing service providers and property managers, addressing the issue of overcrowding is complex as there are no set of guidelines for determining the maximum capacity for a unit. Fair housing issues may arise from policies aimed to limit overcrowding that have a disparate impact on specific racial or ethnic groups with higher proportion of overcrowding.

Local Trends

Overcrowding in Stanislaus County falls at or above the statewide average of 8.2 percent, with most of the county in the 8.2 to 12 percent range. The highest percentage of overcrowding (above 20 percent) within the county is occurring in the Rouse, Bystrom, and Airport, as seen in Figure 3-46. According to the 2020 ACS 5-year estimates, overcrowding was very similar in Stanislaus County and the state (see Table 3-13). However, severe overcrowding in the state of 6.38 percent was much higher than rates in Stanislaus at 3.39 percent. Areas with higher rates of overcrowding overlap with low resource areas and areas of high segregation and poverty, particularly with areas with less positive economic outcomes and less positive environmental scores.

In Stanislaus County, other race, Hispanic, and multi-racial households have the highest percentage of overcrowding, as shown in Table 3-14. White, non-Hispanic/Latino residents have significantly lower rates of overcrowding (three percent) compared to all other racial/ethnic groups.

Table 3-13 Overcrowded Households

	Stanislaus County	California
Overcrowded - Owner Occupied	3.34%	3.08%
Overcrowded – Renter Occupied	7.87%	8.07%
Total Overcrowded	11.21%	11.15%
Severely-Overcrowded – Owner Occupied	1.12%	1.10%
Severely-Overcrowded – Renter Occupied	2.28%	5.29%
Total Severely Overcrowded	3.39%	6.38%

Source: U.S. Census, American Community Survey 2016-2020 5-Year estimates, Table B25014.

Table 3-14 Overcrowded Households by Race/Ethnicity, Stanislaus County

	Total Households	More than 1 Person per Room	Percent Ownership
Asian Alone	9,222	1,066	11.56%
American Indian and Alaska Native Alone	1,509	113	7.49%
Black Alone	5,462	199	3.64%
Hispanic or Latino	63,841	8,678	13.59%
Two or More Races Alone	11,344	1,210	10.67%
Some Other Race Alone	14,524	2,215	15.25%
White Alone, not Hispanic or Latino	91,203	2,105	2.31%
Total	197,105	15,586	

Source: U.S. Census, American Community Survey 2016-2020 5-Year estimates, Table B25014.

Regional Comparison

Regarding overcrowding throughout the Northern San Joaquin Valley, Stanislaus County compares similarly or slightly above the other counties. Stanislaus County has fewer areas with a higher percentage of overcrowding (15.01- over 20 percent) compared to the region, as seen in Figure 3-48. Areas of overcrowding are consistently seen in major cities and in some cases in surrounding agricultural lands. Stanislaus County and San Joaquin County do not have any concentrations of severely overcrowded households, whereas the northmost area of Merced County has a concentrated area of severely overcrowded households (Figure 3-49).

3.12.3 Housing Problems

CHAS data identifies four possible housing problems: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. A household is said to have a housing problem if they have any one or more of these four problems. Figure 3-47 and Figure 3-50 show the distribution of households experiencing housing problems.

HUD considers housing units to be “standard units” if they comply with local building codes. Housing age can be an important indicator of housing condition in a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Typically, housing over 30 years old is more likely to have rehabilitation needs that may include replacing plumbing, roof repairs, foundation work, and other repairs. Housing units built before 1978 may have health risks such as lead-based paint and asbestos. Housing issues prompted by disrepair such as mold may elevate health conditions such as asthma.

Local Trends

There are a number of areas in Stanislaus County that have severe housing problems. Figure 3-47 shows areas that experience one or more severe housing problems fall within the 20 to 40 percent range. The few areas within the county where 40 to 60 percent of households have severe housing problems are in the South Modesto CDPs of Bystrom, Bret Harte, and Riverdale Park, as well as Airport.

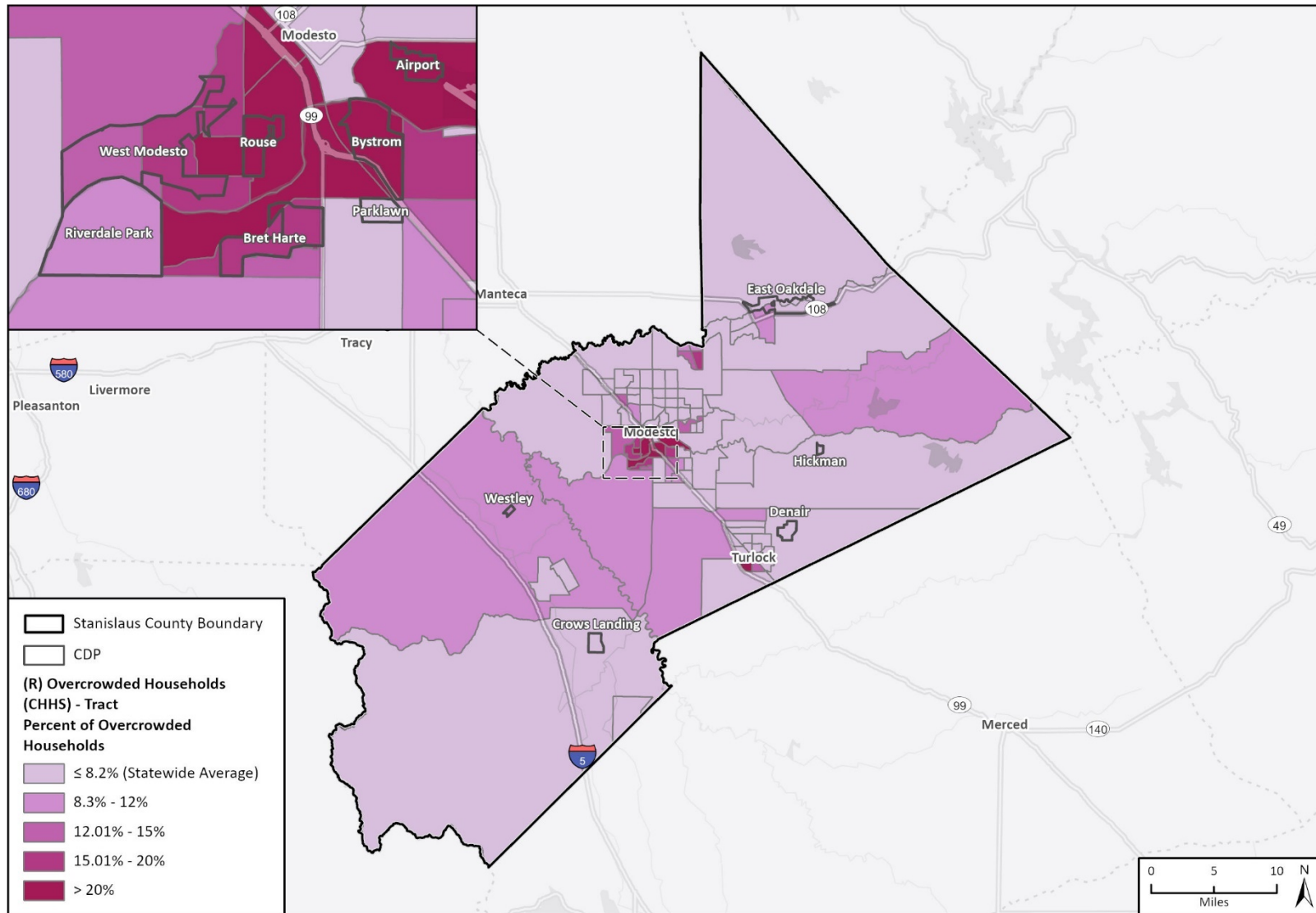
According to 2017-2021 ACS estimates, Stanislaus County has approximately 1,966 substandard housing units, which comprises about one percent of the total occupied units in the county. Of the 1,966 substandard housing units, 33 percent (650 units) lack complete plumbing and 67 percent (1,316 units) lack complete kitchen facilities.

Regional Comparison

The distribution of households with severe housing problems is displayed in Figure 3-50. Households with severe housing problems are seen in major cities and along major highways throughout the region.

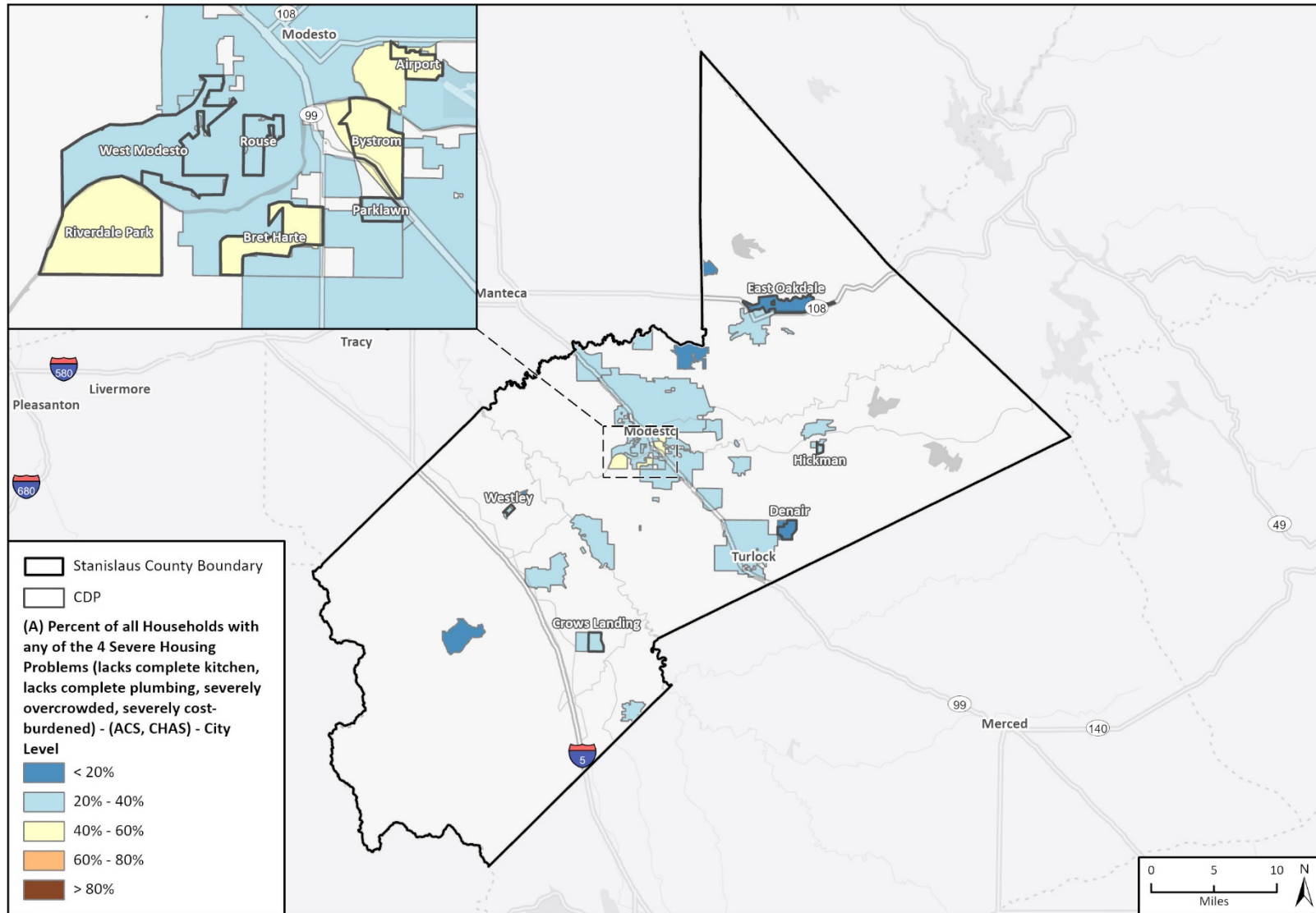
Trends among substandard housing units are similar in Stanislaus County and the rest of the Northern San Joaquin Valley. According to 2017-2021 ACS estimates, there are approximately 5,769 substandard housing units in the Northern San Joaquin Valley, equal to about one percent of the total occupied units in the county. Of the total substandard housing units, 34 percent (1,979 units) lack complete plumbing and 66 percent (3,790 units) lack complete kitchen facilities.

Figure 3-46 Overcrowded Households, Stanislaus County



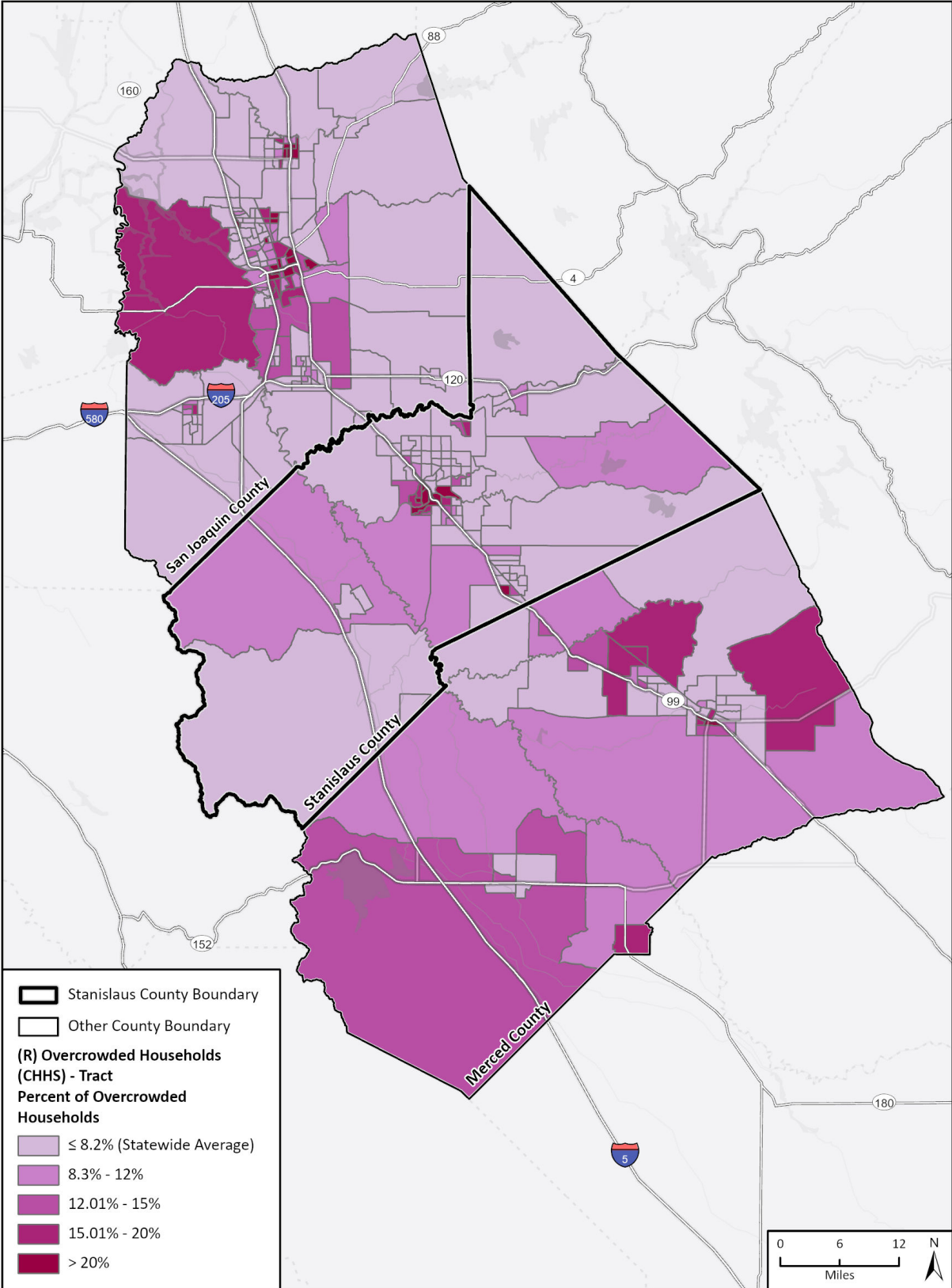
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-47 Percent of Households with Severe Housing Problems, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

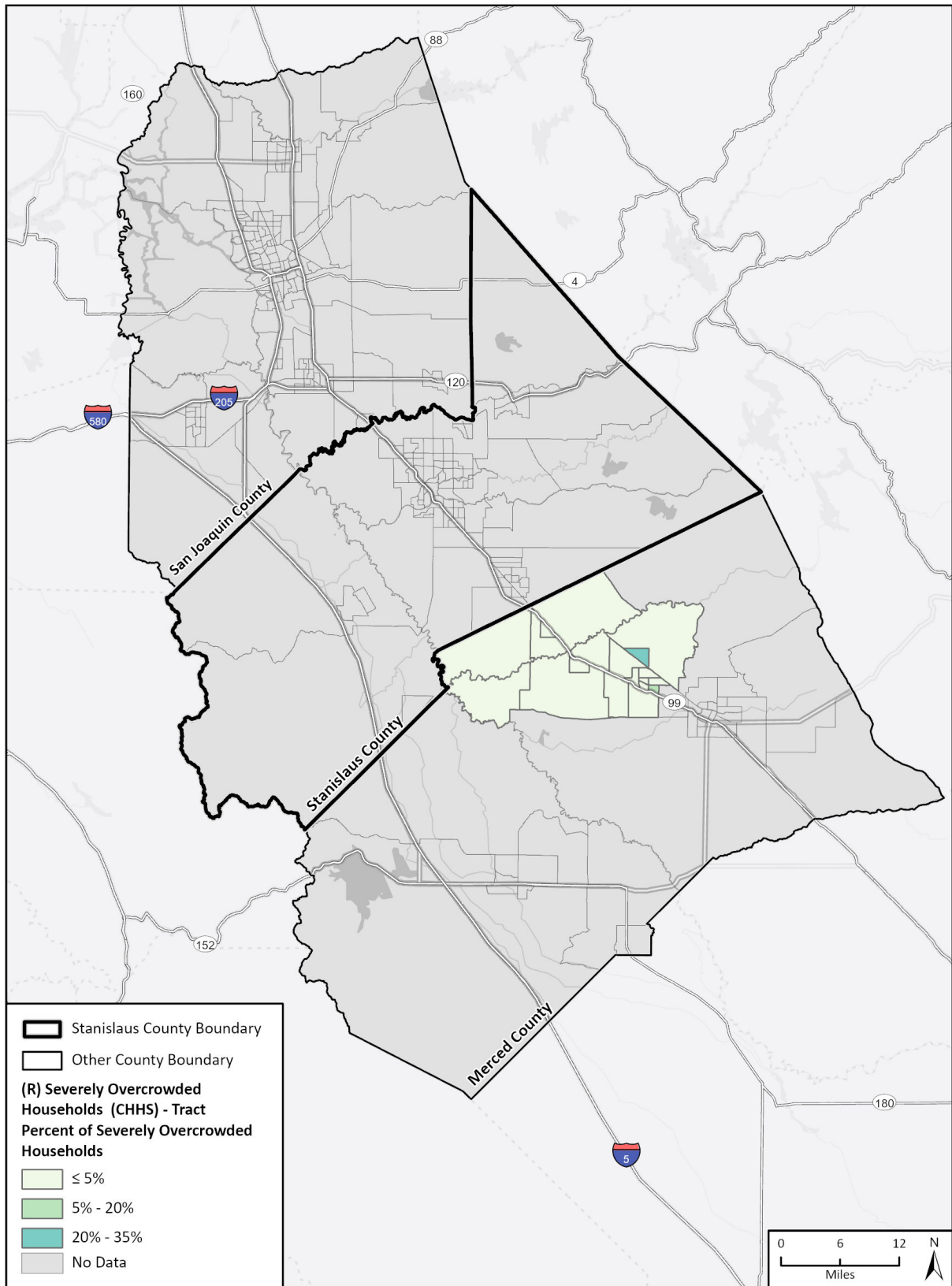
Figure 3-48 Overcrowded Households, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2020

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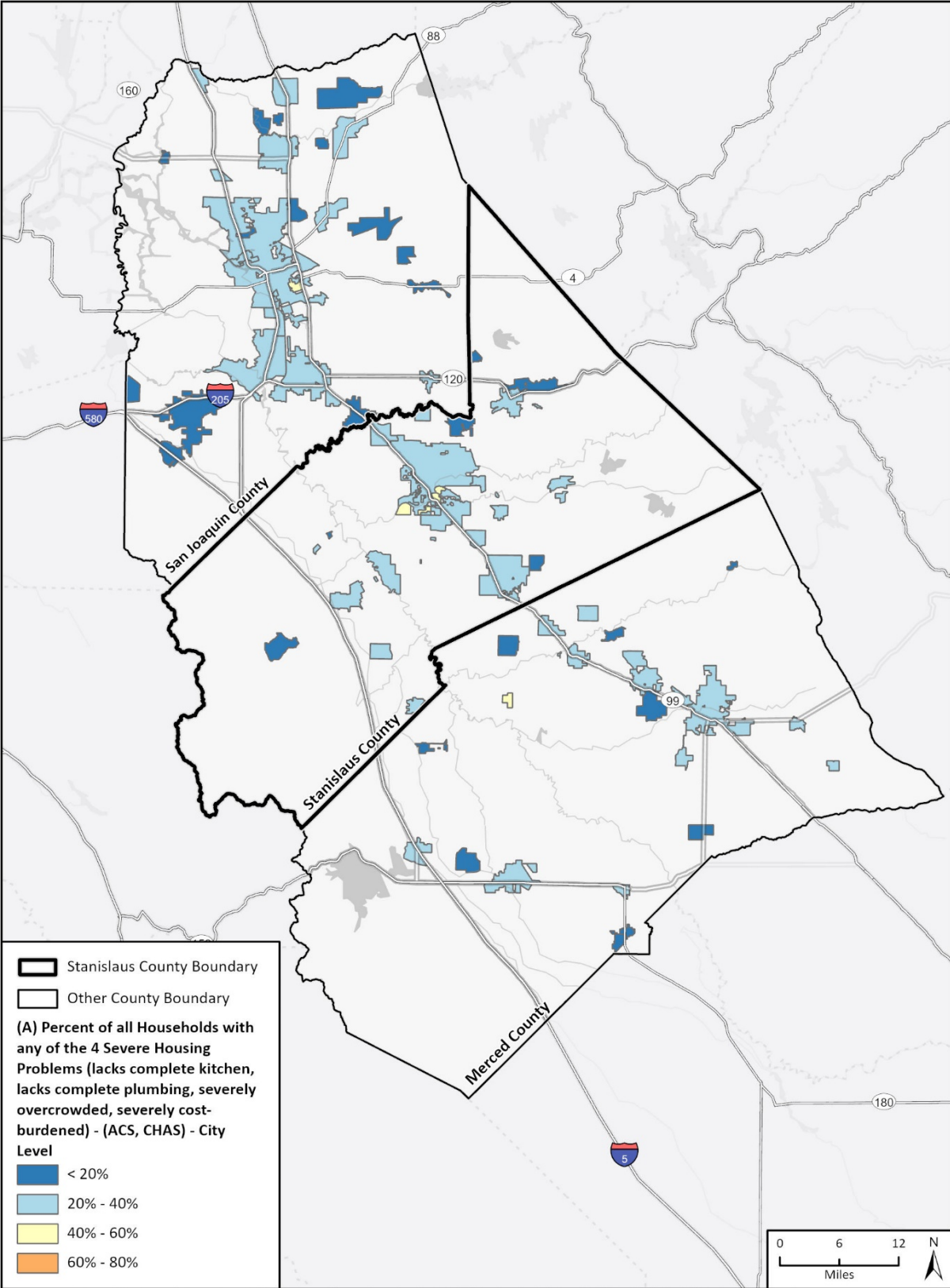
Figure 3-49 Severely Overcrowded Households, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2020

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Figure 3-50 Percent of Households with Severe Housing Problems, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

3.12.4 Displacement

Displacement, as defined by HCD, is used to describe any involuntary household move caused by landlord action or market changes. Shifts in neighborhood composition are often framed and perpetuated by established patterns of racial inequity and segregation. The movement of people, public policies, investments (such as capital improvements and planned transit stops) and flows of private capital can lead to displacement. Displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, aging unmaintained units, and insufficient market-rate housing production. Decades of disinvestment in low-income communities, coupled with investor speculation, can result in a rent gap or a disparity between current rental income of the land, and potentially achievable rental income if the property is converted to its most profitable use. These processes can disproportionately impact people of color, as well as lower-income households, persons with disabilities, large households, and persons at-risk of or experiencing homelessness.¹⁶

To analyze displacement risk, the Urban Displacement Project (UDP) has established categories that reflect varying levels of displacement vulnerability. A census tract is flagged as a sensitive community if it meets the following criteria as both vulnerable and experiencing market-based displacement pressure:

1. Proportion of very low-income residents was above 20 percent in 2017; and
2. The census tract meets two of the following criteria:
 - a. Share of renters was above 40 percent in 2017;
 - b. Share of people of color was above 50 percent in 2017;
 - c. Share of very low-income households (50 percent AMI or below) that are also severely rent burdened households was above the county median in 2017; or
 - d. Nearby areas have been experiencing displacement pressures.

Local Trends

According to the UDP metrics, the southern portion of the county has the highest displacement risk as shown in Figure 3-51. South Modesto, West Modesto, Airport, Empire, and Crows Landing are the CDPs that fall within sensitive communities. These CDPs overlap with a high displacement risk, as Figure 3-52 shows. Airport, Bystrom, and part of West Modesto all have one group at risk of displacement, meaning that there is either a high or elevated risk for an income group within that census tract. Within these three areas, there is an elevated risk for very low-income households. Rouse is the only location where there are two income groups at risk of displacement: a high risk of displacement for low-income and extreme displacement risk for very low-income households. Census tracts with higher displacement risk also overlap with R/ECAPs and areas with higher poverty rates, high rates of overcrowding, and high rates of overpayment by renters.

Census tracts with a higher displacement risk mostly consist of low resource areas and areas of high segregation and poverty and are predominantly Hispanic/Latino. As areas that currently lack access to resources gain access to services, amenities, and infrastructure, displacement risk for low-income households will be amplified, especially for renters. These improvements will enhance the desirability of these areas and could drive housing costs even higher. Programs 1-4 (Preservation of At-Risk Affordable Housing) and 5-3 (Displacement Prevention) contain actions to mitigate displacement risk

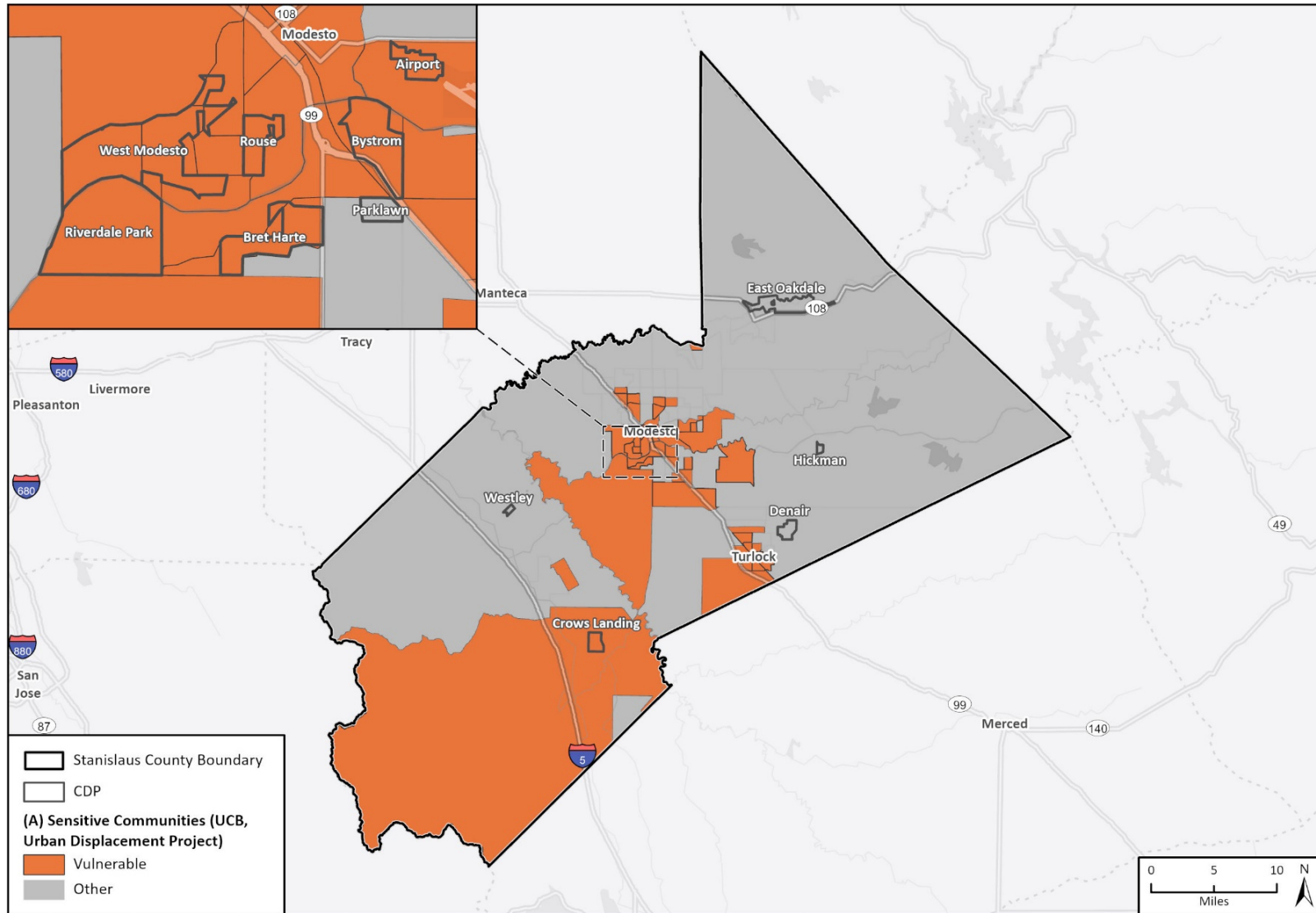
¹⁶ HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

by preserving existing affordable housing and connecting at-risk residents to legal services and resources.

Regional Comparison

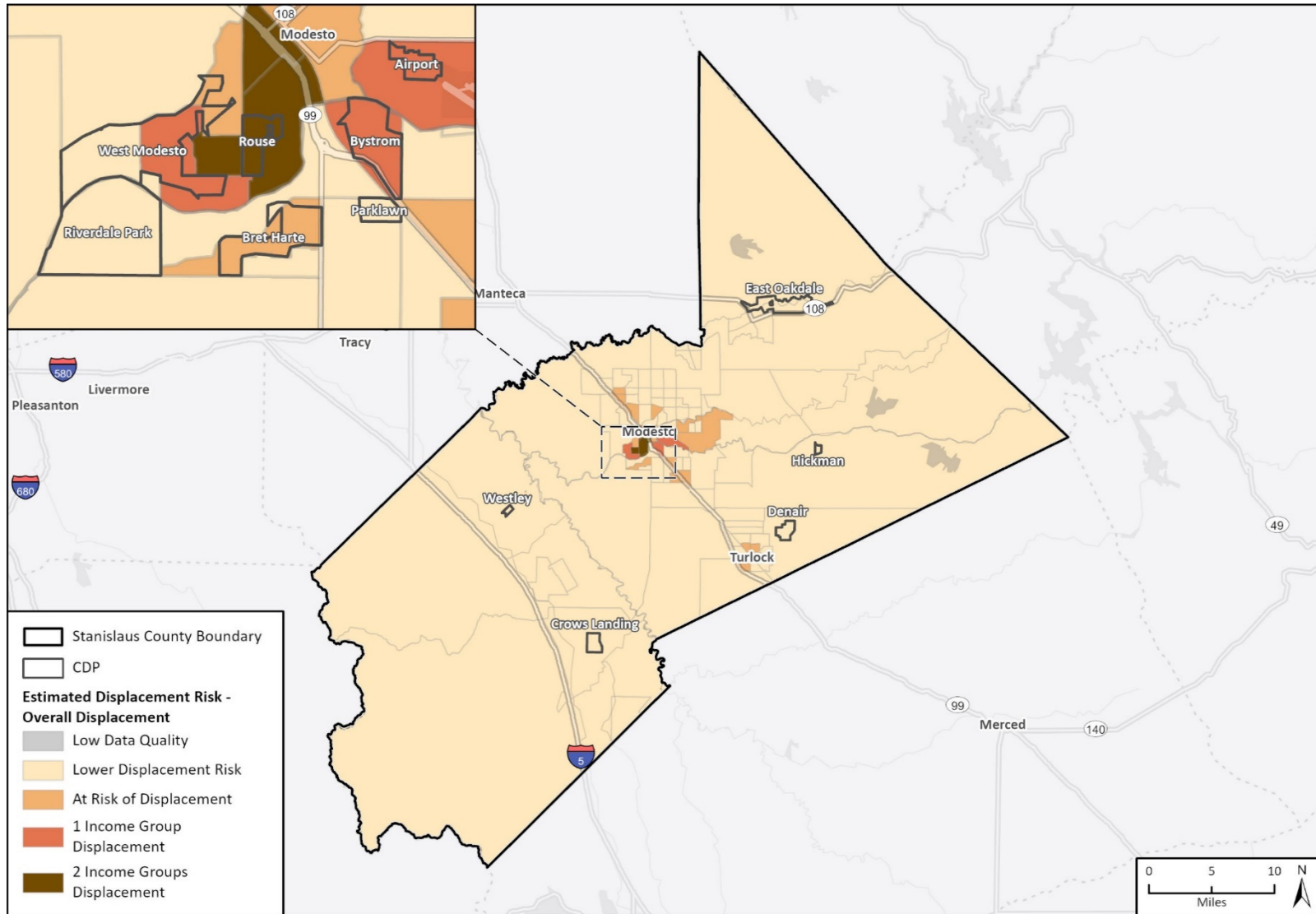
Stanislaus County is the only county in the Northern San Joaquin Valley where one or more income groups risk displacement. Generally, most of the region has a low risk of displacement and areas at risk of displacement are seen within major cities, as seen in Figure 3-53. The areas at risk of displacement overlap with areas that experience higher rent.

Figure 3-51 Sensitive Communities, Stanislaus County



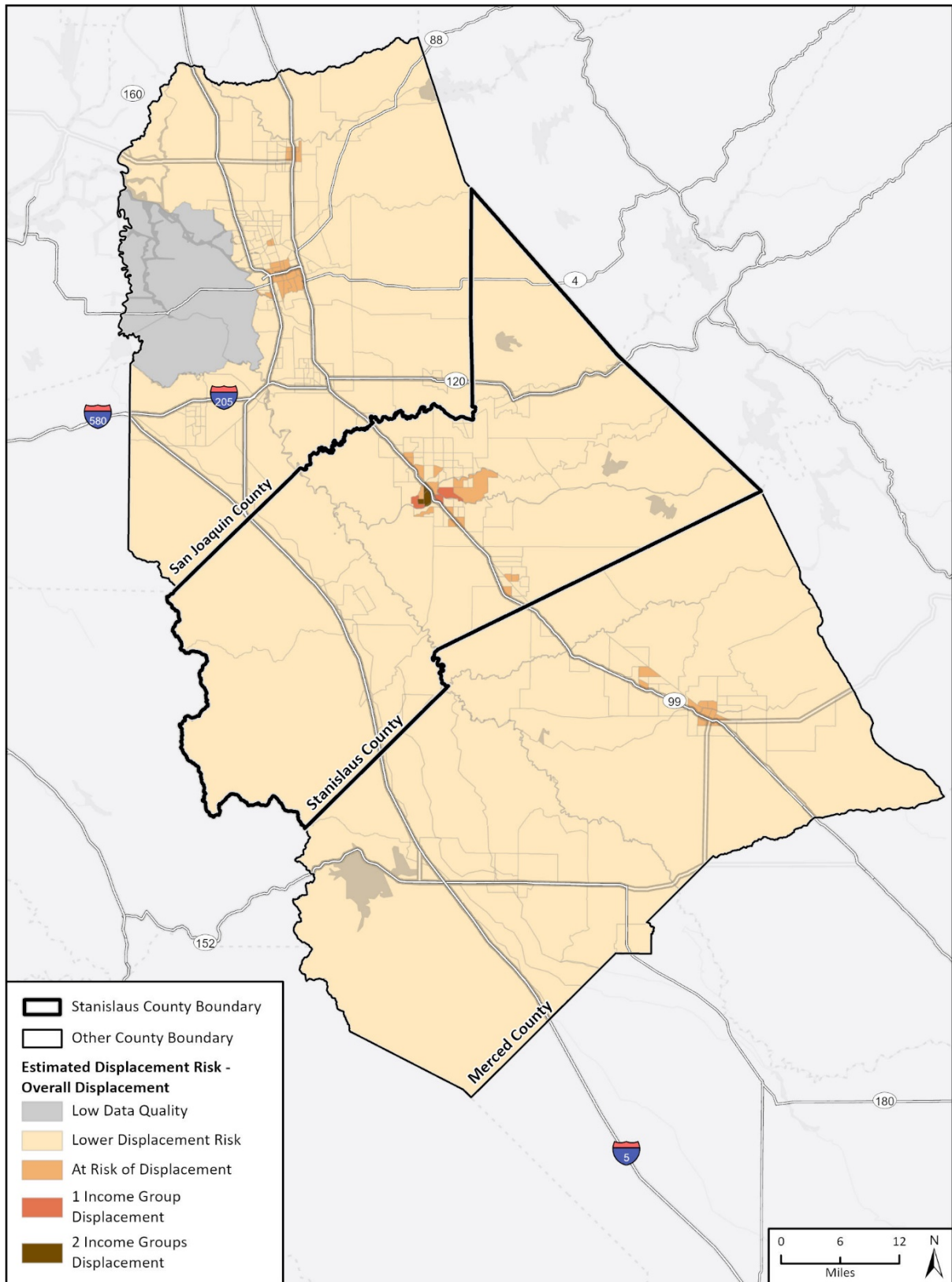
Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-52 Estimated Displacement Risk, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-53 Estimated Displacement Risk, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022

3.12.5 Homelessness

Displacement risk can disproportionately impact people who are at-risk of or are experiencing homelessness. As described above, communities sensitive to displacement are near city centers and in agricultural areas. Typically, displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, and insufficient market-rate housing production, leaving individuals at-risk of homelessness. In addition, the unhoused population is often represented by those with disabilities, as this group has unique needs in finding housing.

California Government Code Section 65583(1)(6) requires municipalities to address the special needs of persons experiencing homelessness within their boundaries. "Homelessness," as defined by HUD, describes an individual, who is not imprisoned or otherwise detained, who:

- Lacks a fixed, regular, and adequate nighttime residence; or
- Has a primary nighttime residence that is:
 - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - 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.

Local Trends

The primary quantitative data source on shelters for homelessness and homelessness count is the Point-in-Time (PIT) count. With help of volunteers, the 2023 count was organized by the Stanislaus Community System of Care (CSOC) to track the number of people who are currently experiencing homelessness. The 2023 PIT count identified a total of 2,091 people experiencing homelessness in Stanislaus County. Of the individuals counted in Stanislaus County, 941 were unsheltered, and 1,150 individuals were sheltered. Of those who were counted in 2023, approximately 23 percent identified as having a mental illness and 12 percent identified as survivors of domestic violence. As seen in Table 3-15, those counted were likely to be Hispanic, White, or Black or African American. Of the individuals counted, 79 were located in unincorporated communities, with the highest count located in Empire.

When it comes to housing for homeless individuals, Stanislaus County has 14 available emergency shelters, as seen in Table 3-16. According to 2019 HUD data, out of the emergency shelters in the county approximately 93 percent of them have occupied beds (Figure 3-54).

Table 3-15 Homelessness by Race, Stanislaus County

	Number	Percent of Total
Hispanic or Latino		37.0%
White Alone	1,485	71.0%
Black or African American Alone	272	13.0%
American Indian And Alaska Native Alone	105	5.0%
Asian Alone	42	2.0%
Native Hawaiian And Other Pacific Islander Alone	42	2.0%
Some Other Race or Two or More Races	146	7.0%
Total Population	2,091	

Source: Stanislaus County Point-in-Time Count, 2023

Table 3-16 Emergency Shelters in Stanislaus County

Project Name	Organization Name	Address	Total Beds
CHSS Empire Camp ES	Community Housing and Shelter Services - CHSS	6132 South Ave. Empire, CA 95319	73
Access Center Emergency Shelter	Salvation Army	330 9 th Street Modesto, CA 95351	180
The Salvation Army Haig & Isabel Berberian Shelter & Transitional Living Center	Salvation Army	320 9 th Street Modesto, CA 95351	182
Marsha's House	Children's Crisis Center	2321 E Whitmore Ave Ceres, CA 95307	8
CHSS Emergency Shelter	Community Housing and Shelter Services - CHSS	708 H St Ste B Modesto, CA 95354	82
The Mission	Modesto Gospel Mission	1400 Yosemite Blvd Modesto, CA 95354	225
Hutton House	Center for Human Services - CHS	2008 W. Briggsmore Avenue Modesto, CA 95350	7
TGP Women Shelter	Turlock Gospel Mission	432 S. Broadway Turlock, CA 95380	22
Family Promise Interfaith Hospitality Network	Family Promise	2301 Woodland Ave #8 Modesto, CA 95358	14
REST House	Stanislaus County Affordable Housing Corporation - STANCO	512 Vine St Modesto, CA 95351	11
HOST	Helping Others Sleep Tonight- HOST	405 S 4 th St Patterson, CA 95363	25
Hutton House	Youth Navigation Center of Stanislaus County	2004 W Briggsmore Ave Modesto, CA 95350	24
Garden Gate Respite	Turning Point	609 5 th St Modesto, CA 95351	11

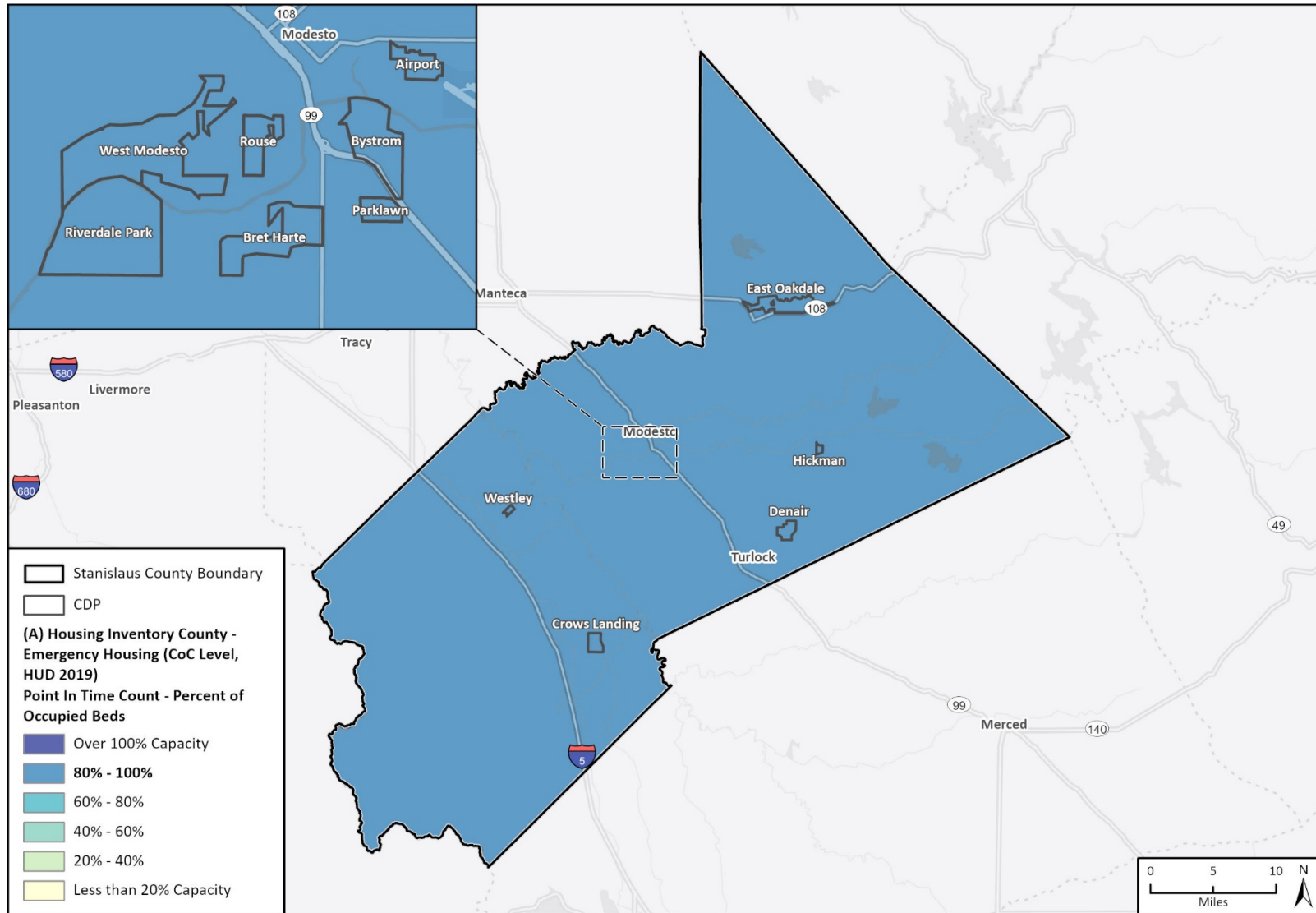
Project Name	Organization Name	Address	Total Beds
We Care Shelter	We Care Program	219 S Broadway Turlock, CA 95380	49
Verda's House	Children's Crisis Center	715 E Main St Turlock, CA 95380	7

Source: Point-in-Time Count – Emergency Shelter Housing, HUD 2020 CoC Housing Inventory Count

Regional Comparison

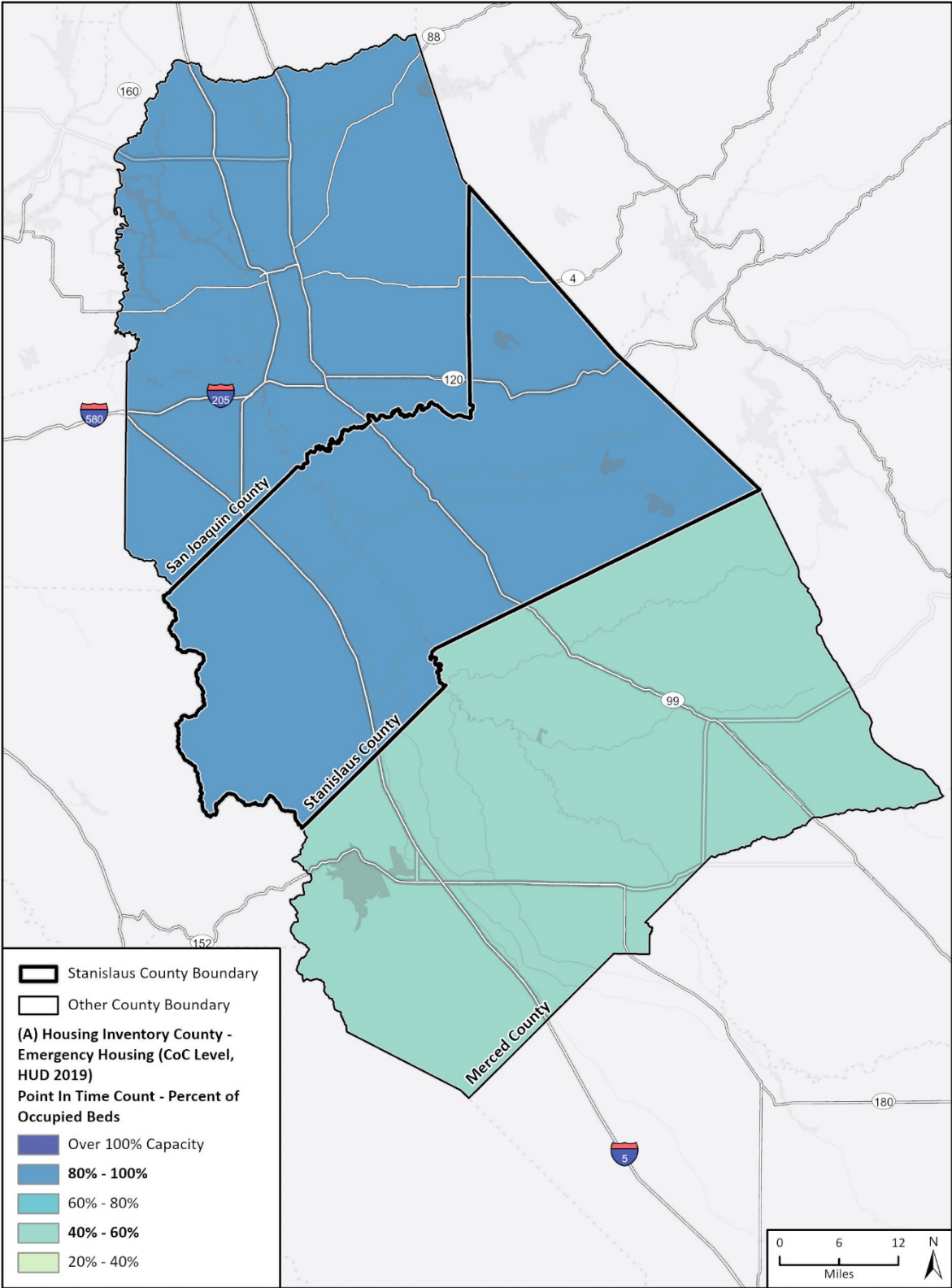
In comparing the number of available beds in Stanislaus County to the other counties in the region, Stanislaus lies in the middle and is the only county that provides a seasonal emergency shelter. Regionally there are a total of 36 emergency shelters, with 17 in San Joaquin County, 14 in Stanislaus, and five in Merced County. However, these shelters are reaching capacity with 100 percent of the beds occupied in San Joaquin County, 93 percent in Stanislaus County, and 53 percent of beds occupied in Merced County (Figure 3-55). Overall, with the lack of capacity in existing emergency shelters, there is a greater need for more emergency housing located throughout the region to support the needs of homeless individuals.

Figure 3-54 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

Figure 3-55 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Region



Fresno County Dept. PWP, Merced County Association of Gov, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022 21_12095_HE_AFFH AFFH - Regional

3.13 Local Knowledge

3.13.1 Historic Patterns of Segregation

Patterns of racial segregation are the byproduct of local and federal policies, private housing discrimination, and community prejudice. To understand present challenges to fair housing, it is necessary to review the history of actions that have led to regional patterns of segregation.

The first inhabitants in the San Joaquin Valley were the Yokut-speaking tribes, composed of approximately 50 groups who spoke various dialects. Mexican ranchers and American settlers gained prominence in the 1800s and raised animals. After the U.S. annexed California in 1848, the federal government sold vast tracts of land to the Southern Pacific Railroad Company as well as large-scale timber, ranching, and farming interests, ignoring and overriding the property rights of Mexican and Indigenous landholders. Many Native American tribes were forced to give up their land and live on reservations.¹⁷ When gold was discovered in 1848, thousands of prospectors came to the San Joaquin Valley and with them, they brought diseases that quickly decimated the Native American population.¹⁸

Chinese and Japanese immigrants, originally brought to California by the Gold Rush and later to work on the Southern Pacific Railroad, began to work as farm laborers throughout the San Joaquin Valley. However, resentment towards Chinese and Japanese immigrants, especially by jobless white residents, led to farms recruiting Black/African Americans from the southern U.S. to replace them as farm laborers. Many Black/African Americans began by working in the fields and vineyards and eventually transitioned from farm labor to living in the cities and towns.¹⁹

In the 1930s, nearly half a million people migrated to Southern and Central California from across the United States during what was known as the “Dust Bowl.” Many of these people moved to California in hopes of working in the agricultural industry, but were forced to take temporary and transient work, leaving them with little choice but to form makeshift camps near roadsides and ditches, without access to housing, clean water, and sanitation. These conditions, as well as lack of medical treatment and education, were exacerbated for the non-white migrant farmworkers as a result of economic and racial segregation. When World War II created a need for manufacturing labor, many of the white “Dust Bowl” workers relocated to other cities in California, such as San Francisco, Los Angeles, and San Diego, leaving a gap in farm labor.²⁰ Japanese, Punjabi, and Filipino people, as well as Black/African Americans from cotton regions, filled the void. Japanese residents, however, were forcibly relocated to internment camps from 1942 to 1946.²¹

In 1942, the federal government initiated the Bracero program, which enabled growers to replenish their labor supply with workers imported from Mexico. While the Bracero program ended in 1964, growers continue to rely on Mexican nationals to work California’s lucrative “factories in the fields.”

¹⁷ PolicyLink. Facing History, Uprooting Inequality: A Path to Housing Justice in California. https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf

¹⁸ Tule River Indian Tribe of California. 2018. Tule River History. <https://tulerivertribe-nsn.gov/history/>

¹⁹ Michael Eissinger. 2009. The Transplantation Of African Americans And Cotton Culture To California’s Rural San Joaquin Valley During The Nineteenth And Twentieth Centuries.

https://meissinger.com/uploads/3/4/9/1/34919185/transplantation_of_african_americans_and_cotton_culture_to_californias_rural_san_joaquin_valley.pdf

²⁰ Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives.

https://www.csub.edu/library/_files/DB_files/OKieHealth.pdf

²¹ History.com. Japanese Internment. <https://www.history.com/topics/world-war-ii/japanese-american-relocation>

Migrants today confront multiple social, environmental, and access issues, including affordable, safe, and sanitary housing.²²

Increasingly after the first World War, to circumvent the US Supreme Court ban on outright racial zoning, local governments implemented other forms of exclusionary zoning that avoided direct mention of race but kept low-income people of color out by marshalling land use regulations against them. Through residential zoning that mandates larger parcel sizes for single-family homes, typically unaffordable to people of color, wealthier households established and maintained mostly white neighborhoods throughout California. The federal government subsidized white homeownership and wealth-building and excluded people of color.²³

Throughout the state, but particularly concentrated in inland areas, some cities have used their annexation power to reinforce patterns of racial exclusion and segregation. Since the 1960s, as cities expanded and selectively annexed land, some deliberately bypassed and grew around communities of color in unincorporated neighborhoods, the very places people of color were relegated to by restrictive covenants. This selective annexation process has left hundreds of disadvantaged unincorporated places, disproportionately of color, without the most basic elements of a healthy, safe community, such as utilities, sanitation, safe drinking water, and other critical community services. Restrictive covenants, exclusion, and racial violence pushed Black/African American and low-income people of color to settle outside of towns. In places throughout the San Joaquin Valley and on the fringes of cities such as Fresno, Bakersfield, Stockton, Tulare, and Modesto, such communities of color were left unincorporated and without access to incorporated areas' tax revenues or infrastructure.²⁴ Exclusionary post-war development started moving further from city centers, and within time, these communities often created their own civic and utility districts, which redistributed investment away from cities, in a movement known as "White Flight."

Across the United States, redlined and marginalized communities faced a higher propensity for environmental hazards that affects current populations. Residents of historically redlined neighborhoods located in cities with oil and gas production have disproportionately high exposure to oil and gas wells, compared to higher graded neighborhoods. Exposure disparities have implications for community environmental health, as the presence of active and abandoned (i.e., postproduction) oil and gas wells have been shown to contribute to ongoing air pollution.

The agricultural industry continues to play a large role in the economy and development patterns throughout the Northern San Joaquin Valley region. Small predominantly Hispanic/Latino communities, such as the Monterey Park Tract in Stanislaus County, were once home to Black/African American farm workers, and today remain isolated from other areas of the county. Areas such as these have high rates of poverty, experience disproportionately high pollution burden and lack reliable water systems.²⁵ Although according to the County's Disadvantaged Unincorporated Communities Report, the County is making efforts to inventory each communities needs and install the necessary infrastructure.²⁶ Incorporation and annexation has continued to be an issue in the

²² Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives.

https://www.csub.edu/library/_files/DB_files/OkieHealth.pdf

²³ National Parks Service, U.S. Department of the Interior, and National Historic Landmarks Program, Civil Rights in America: Racial Discrimination in Housing, March 2021.

https://www.nps.gov/subjects/nationalhistoricalandmarks/upload/Civil_Rights_Housing_NHL_Theme_Study_revisedfinal.pdfv

²⁴ PolicyLink. Facing History, Uprooting Inequality: A Path to Housing Justice in California.

https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf

²⁵ Jose Del Real. 2019. How Racism Ripples Through Rural California's Pipes. <https://www.nytimes.com/2019/11/29/us/water-racism-california.html>

²⁶ Stanislaus County Disadvantaged Unincorporated Communities Report, November 2015.

<https://www.stancounty.com/planning/pl/documents/gp/i-d-stanislaus-county-disadvantaged-unin-communities-report.pdf>

county, due to urbanized lands not being annexed because they lack the necessary infrastructure needed to become part of an incorporated city.

3.13.2 Existing County Efforts

The County continues its work to revitalize historically disadvantaged communities and improve access to opportunities for residents throughout unincorporated parts of the county. Efforts include improving access to public infrastructure (including curbs, gutter, sidewalks, streets, sewer, storm drains, lighting, etc.). Between 2019 and 2020, the County began development of cost estimates for public improvements covering 41 individual urban pockets (County islands), predominately around the cities of Modesto, Turlock, Ceres, and Riverbank and thirteen County communities. As of September 2022, the estimated total infrastructure cost was approximately \$707 million. In May of 2021, the County allocated \$50 million of American Rescue Plan Act of 2021 (ARPA) funding allocated to the County to be used for community infrastructure improvements. Funded projects respond to the need to achieve an adequate minimum level of basic infrastructure for households in undeveloped areas of the County by providing sewer. The ARPA funds have provided a unique opportunity for the County to make substantial progress strategically in the infrastructure needs of its urban pocket and County communities.

In accordance with actions taken by the County in August of 2011, residential infrastructure projects utilizing Community Development Block Grant (CDBG) funding are prioritized by public health and safety needs – with installation of sewer mainlines and potable water systems being the priority. Since 2015, the County has utilized CDBG funding, in combination with State Water Board funding to provide sewer infrastructure to the Airport and Parklawn neighborhoods and is currently working on providing sewer infrastructure in the West Modesto area.

The County has also recently completed and is in the process of implementing various transportation and stormwater improvement projects designed to improve active transit and reduce flooding in disadvantaged communities. The following is a summary of those improvements:

- Installation of new bus stop shelters with security lighting in the communities of Empire, Hickman, Westley, and Keyes, and within the unincorporated areas of Ceres, Patterson, and Riverbank.
- Replacement of 99 curb ramps meeting current Caltrans ADA standards in the communities of Denair, Del Rio, and Ceres.
- Installation of at-grade sidewalks and class I, III, and IV bike lanes throughout the Airport Neighborhood, improving access to alternative modes of transportation to area residents.
- Completion of Phase I of a Proposition 1 Disadvantaged Communities Involvement Grant intended to alleviate flooding in disadvantaged communities along Dry Creek and the Tuolumne River. Phase I of the project consisted of the selection of ten potential groundwater recharge project sites and development a GIS database of the Dry Creek Watershed. Phase II includes analysis of potential project sites identified in Phase I and selection of the most promising sites.

3.14 Community Input

The following is a summary of the fair housing themes and issues that were identified through community engagement. More details about engagement conducted for this Housing Element update can be found in Chapter 1, Introduction.

3.14.1 Community Workshops

Stanislaus County hosted two community workshop events in 2022 to discuss the housing element update and potential inventory sites. To maximize participation in these events, the County distributed flyers in both English and Spanish, with translators provided at each workshop.

The first workshop in June 2022 was held virtually. Participants were asked questions regarding communities in need of housing services, unmet housing needs, barriers to affordable housing, and ways to address these needs and barriers. The responses to these questions were:

- Homeless and transitional housing is the most immediate need in the county.
- Affordable senior housing is needed, very few units available.
- Zoning is a barrier. 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.
- Proximity to transportation and resources is needed in urban areas of unincorporated county, especially near Modesto.
- Provide more incentives for developers of special needs and senior housing.

The second community workshop was held in-person in October 2022 to review and discuss the draft sites inventory. During the workshop, posters and activity stations were available to gather input from participants. The input received showed that participants encouraged housing sites near town centers and located near transit opportunities.

3.14.2 Stakeholder Interviews

The County conducted 11 one-on-one stakeholder interviews with local housing developers, agencies, and housing and community health advocates. Through these interviews, the County identified the following themes related to fair housing:

- **Community Outreach.** Stakeholders felt that additional effort is needed to help inform and educate community members in the unincorporated areas on housing rights and housing assistance opportunities. Informational and financial resource information is scattered and hard to navigate. Stakeholders report that a central information hub would be highly valued.
- **Investment in Communities.** Stakeholders expressed that some lower income, rural communities have lacked the level of investment seen in incorporated cities and wealthier neighborhoods in the county. In some cases, communities with higher percentages of people of color have received priority for infrastructure investment or consideration for annexation. Stakeholders express a desire for attention to be given to each community, how it is developed, and if the commercial and residential uses are compatible.
- **Language Barriers.** Many households in the unincorporated areas of the county need materials translated to Spanish and online outreach in Spanish to be informed on housing issues and opportunities. Stakeholders expressed the importance of translation services in getting community members to participate.
- **Lack of Transportation Options.** Although there is bus service in the unincorporated county it is not dependable and does not have enough stops throughout communities to make it a reasonable

alternative to cars. A lack of transportation options makes it difficult for people, especially seniors and people with disabilities, to get to work, school, local stores and markets, and community services.

- **Lack of Services.** Some unincorporated areas of the county lack sufficient services such as afterschool programs, grocery stores, and banks.
- **Housing Rehabilitation.** Many of the units in the unincorporated county need rehabilitation, however, older long-term homeowners often cannot afford repairs. As a result, these homeowners often do not make the repairs at all or sell the property. Stakeholders felt that owners of rental units in disrepair are not motivated to rehabilitate substandard living conditions voluntarily due to high demand for rental units. Many tenants do not report these substandard living conditions out of fear of losing their housing through eviction or retaliation.
- **Transitional/Supportive Housing and Residents Experiencing Homelessness.** Many people in the community experiencing homelessness generally live in parks, cars, or vacant lots. Many of these individuals suffer from severe mental illness and require mental health services and other social services. Although shelters exist in the area, many are waitlisted, and shelters do not work for all individuals. Additionally, services beyond emergency shelters (i.e., transitional/supportive housing) are inequitably distributed to white residents. Some stakeholders also expressed that homeless residents are often removed from higher income areas and pushed into low-income areas, where there is a slower response for clearing encampments.
- **Workforce Housing.** It is difficult for living wage workers to find quality, safe, and affordable units. As a result, residents are living in large, often overcrowded, households or are paying more than 30 percent of their income on housing.
- **Seniors.** Many of the senior residents of Stanislaus County are on fixed incomes and struggle to find affordable housing. Many senior affordable housing facilities currently have waitlists. As mentioned earlier, lower-income senior homeowners struggle with the costs of home repairs and maintenance.
- **Proximity to Jobs.** Many stakeholders expressed the need for affordable housing to be located near centers of employment. Due to a lack of affordable housing options many people are being forced to relocate to afford housing, pulling them further away from their jobs, communities, and basic services.
- **Park Access.** Although there are parks in or near unincorporated communities, many stakeholders expressed that they are not always accessible due to illegal dumping, encampments, and maintenance issues such as lighting. Some stakeholders also expressed that the funds raised for parks and green space through development fees rarely materializes into park development or improvements.
- **Fair Housing Issues.** Stakeholders described cases of discrimination in housing towards undocumented persons, persons with disabilities, non-native English speakers, large households, and those with past experiences in the criminal justice system. Discrimination is usually in the form of not renting units to people who will need reasonable accommodation for a disability, charging higher rent for undocumented tenants, retaliating against or evicting tenants if complaints are made about substandard conditions, and turning away applicants outright based on a false assumption that lower-income residents are more prone to illicit or illegal activity.
- **Mobile Home Parks.** Mobile homes are typically a last resort before homelessness for many low-income residents. Some stakeholders commented that mobile home parks are coming into corporate ownership, and that these companies increase prices and displacement pressures on existing residents. Additionally, there are often titling issues with the mobile homes that allow

park ownership to purchase the mobile home of a displaced resident at minimal cost, simply to resell it at a high price. Individuals residing in mobile home parks currently have few protections and need support and assistance (i.e., rent stabilization) to prevent homelessness.

- **Community Education and Outreach.** Many stakeholders felt there was an opportunity for there to be greater collaboration between the County and nonprofit organizations to provide better community education resources about homeowner/tenant’s rights, housing assistance, and community services. Many organizations have already compiled this information; however, it is difficult for people to know where to go for information about services and is rarely provided in multiple languages (Spanish, Hmong, Arabic). Some stakeholders also expressed that it would be beneficial to have a one stop shop to connect people to agencies and programs.
- **Antidisplacement Efforts.** Some stakeholders mentioned occurrences of residential areas being redeveloped into commercial uses without replacing the residential units elsewhere, leading to the displacement of existing residents and a reduction in the county’s housing stock. There is an opportunity for the County to implement a program/policy that conversion to nonresidential uses or mitigates the impact on communities.

3.14.3 General Plan and Housing Element Update Survey

The County conducted a community survey to provide additional opportunities for residents to share input and express their visions for the County’s future. The survey was marketed across the County’s various informational and media outlets to maximize community participation. The survey was published on the County’s website from May 16, 2022 to July 7, 2022 and received a total of 148 responses. Approximately 64 percent of respondents own their own home, 28 percent rent their home, and five percent are in some other living situation. The majority of respondents reported residing in a single-family home (72 percent).

Based on survey responses, the following key themes were identified:

- **Housing Needs:** The highest priority housing need identified by respondents was lower-cost housing for all, including both rental and for-sale housing units. Respondents identified affordability of housing as the most urgent housing issue in the county by a significant margin, followed by the availability of housing, and homelessness.
- **Desired Housing Types:** Respondents identified co-housing (housing with an emphasis on community living, e.g., shared open spaces, or kitchens) as the most likely housing type to be successful in unincorporated Stanislaus County, followed by larger, custom homes and single-room occupancy housing units (small apartment that may have a common kitchen).
- **Desired Housing Location:** Respondents identified areas near public transit stops, employment, and shopping centers as the most suitable for new housing development.
- **Housing Services:** The highest priority needs for housing services were down payment assistance for low-income, first-time homebuyers, and home repair assistance for low-income homeowners. The highest priority needs for fair housing services include landlord/tenant counseling and education/information on tenant rights.
- **Housing Quality:** The most common housing quality issue among respondents was lack of energy efficiency and housing structural or maintenance issues.
- **Homelessness:** Many respondents identified concern regarding the prevalence of homelessness and associated issues with crime, noise, and sanitation. In addition, respondents identified a need for housing and services for persons experiencing homelessness.

The following issues were also identified by respondents:

- Need for assistance programs and affordable housing for moderate-income households.
- Rising rental costs make housing increasingly unaffordable.
- Many rental housing units are in poor housing condition and are in need of repair. However, these issues are not resolved when tenants inform landlords of need repairs.

3.15 Other Factors

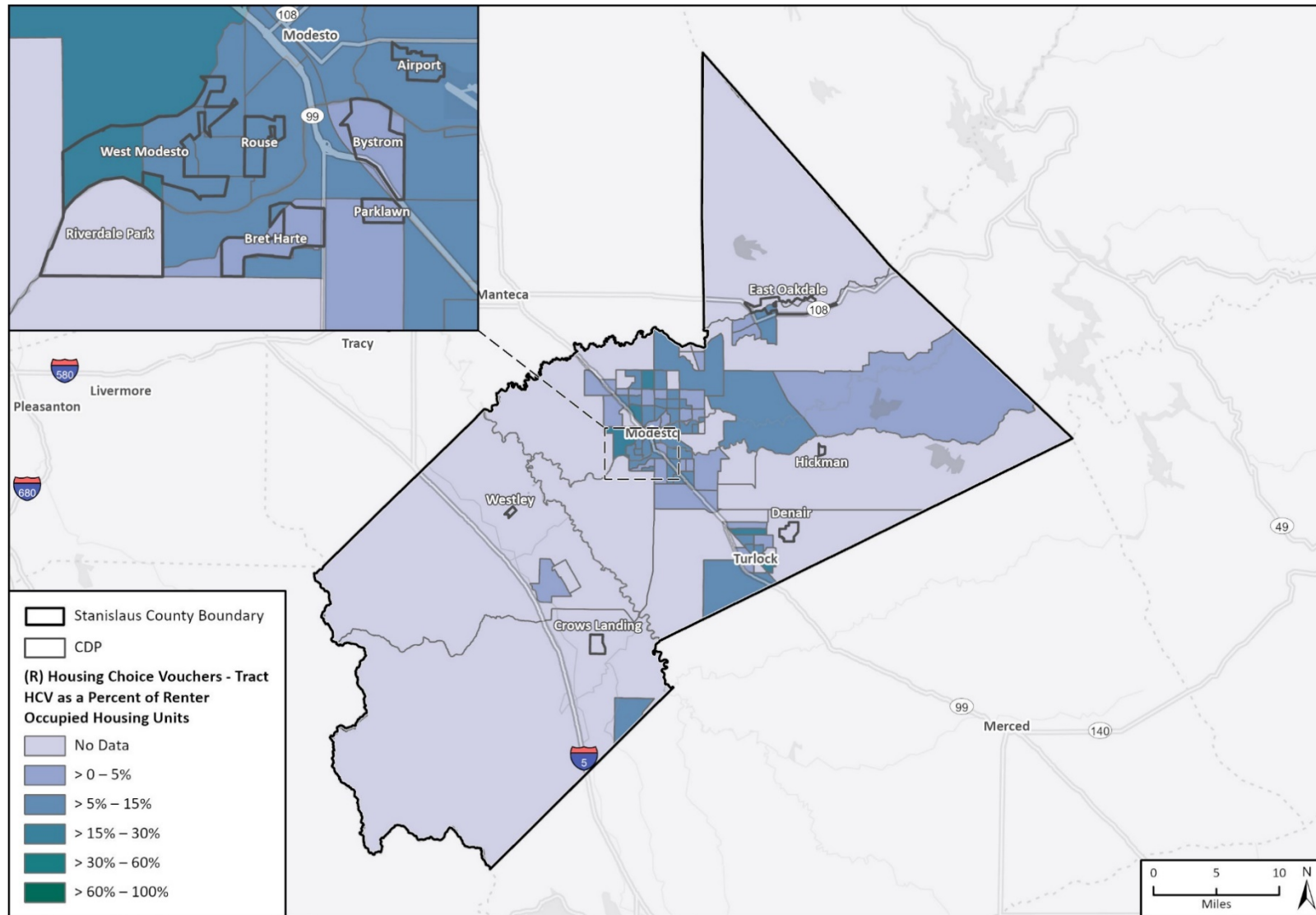
Other factors that have not been previously discussed relating to fair housing include the availability and access to housing choice vouchers in Stanislaus County and access to homeownership.

3.15.1 Housing Choice Vouchers

The Housing Authority within the County provides Housing Choice Vouchers (HCV) to residents and will continue to seek opportunities to increase rental assistance and reduce overpayment. Providing for economic development and small business assistance HUD estimates show that approximately 4,000 households received HCVs in Stanislaus County. As shown in Figure 3-56, the census tracts shown in Stanislaus County range from zero to 30 percent of renter occupied units using HCVs. The area with the highest percentage of households using HCVs is West Modesto.

According to feedback received during public outreach, some households that receive HCVs can have difficulties being able to use them because they are not able to find a place to live due to the overall lack of affordable housing.

Figure 3-56 Housing Choice Vouchers, Stanislaus County



Merced County Association of Gov, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, Safegraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022

3.15.2 Access to Homeownership

To analyze access to homeownership, the 2018 Home Mortgage Disclosure Act (HMDA) is assessed to determine the outcome of loans through demographics. As analyzed in Chapter 4, Housing Constraints, about 16,000 loans originated in Stanislaus County, with nearly 11 percent of them from unincorporated county. Out of the areas assessed, unincorporated county cumulatively saw the lowest approval rate of 54.4 percent. In assessing loan applicants by income in Stanislaus County, most individuals fell into the upper income bracket with very few low-income applicants. The HMDA also assess loan outcomes by race, in which Stanislaus County's Black/African American, American Indian/Alaska Native, and Hispanic/Latino residents were underrepresented in the number of applications filed. Denial rates were also higher for those racial and ethnic groups. Overall, the data analyzed in Chapter 4, Housing Constraints, determines that there is a degree of correlation between race, ethnicity, and income on lending outcomes, and that discrepancies exist in Stanislaus County.

3.15.3 Lack of Services and Infrastructure in Rural, Low-Income Communities

Community feedback identified a lack of services and infrastructure in rural and low-income communities. Community members and stakeholders expressed that newer, wealthier communities have better services and infrastructure than older, lower-income and minority communities. Specific comments received relating to lack of services in unincorporated parts of the county include the lack of code enforcement activities related to illegal dumping, land use infractions, squatters, and environmental issues; lack of reliable public transit; lack of park maintenance; lack of fair housing enforcement activities; and lack of grocery stores and banks. Further community feedback infers that the lack of basic infrastructure such as water, sewer, and sidewalks prevents low-income communities from being considered for annexation. Older unincorporated rural communities were developed without access to services and infrastructure, while newer communities were subject to infrastructure requirements put in place by the developer to meet County standards.

3.16 Sites Inventory

The housing element must demonstrate that there are adequate sites zoned for the development of housing for households at each income level sufficient to accommodate the number of new housing units needed at each income level as identified in the Regional Housing Needs Allocation (RHNA). In the context of AFFH, the process of sites identification involves an analysis of site capacity to accommodate the RHNA, but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

The Sites Inventory includes parcels within 16 CDPs in the county. In total, the sites inventory yielded 2,561 units—1,268 lower-income units, 58 moderate-income units, and 697 above moderate-income units.

3.16.1 Opportunity Areas

HCD/TCAC opportunity maps identify areas throughout the state that support positive economic (low poverty, high employment, high median household income), educational (reading and math proficiency, high school graduation rates, low student poverty rates), and environmental outcomes

(low exposure to pollution). The HCD/TCAC opportunity areas map rank census tracts from Highest Resource to Low Resource based on these characteristics. A census tract with a designation of High Resource indicates that the census tract has strong educational and economic opportunities for current and future residents.

Figure 3-57 through Figure 3-70 show the housing opportunity sites in each CDP by TCAC-designated resource area. The housing opportunity sites are designated by income category—whether the sites could accommodate housing appropriate for low-, moderate-, or above moderate-income households. The “appropriateness” of sites for various affordability levels is dictated by state housing element law and HCD guidance and includes site characteristics such as the size and allowable density of a site, its realistic capacity, availability of sewer and water service, and existing use(s). More information about the sites and income designations is available in Chapter 5, Housing Resources.

The location of housing opportunity sites for each income category were chosen to facilitate the development of mixed-income neighborhoods and to increase the availability of affordable housing in proximity to transit, retail, and other services. However, many of the housing opportunity sites are in low-resource areas (41 percent of the proposed housing units), due to the availability of vacant and underutilized parcels in these areas. While the majority of low- and very low-income units projected in the sites inventory are in low-resource tracts, these tracts have higher access to goods and services, due to their proximity to urban services in the City of Modesto. As shown in Table 3-17, approximately 44 percent of anticipated units are located in South Modesto CDPs. Units were identified in these areas as a result of a sites inventory analysis and supporting development trends that concluded that this area has the highest likelihood of residential development for all income categories, specifically lower-income units.

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Table 3-17 Sites Inventory by Census Tract Characteristics

Development Area	Sites Inventory Capacity + RHNA Credit Projects (Units)					AFFH Indicators					
	Census Tract Number	Number of Existing Households	Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile
Airport	06099002100	1,124	12	32	0	74.7%	High Segregation & Poverty	58.4%	21.8%	1 Income Group Displacement	97.8
Bret Harte*	06099002501	1,536	0	13	1	86.8%	Low Resource	55.2%	6.6%	Lower Displacement Risk	93.0
	06099002402	1,262	419	38	13	88.7%	Low Resource	66.8%	15.7%	At Risk of Displacement	79.6
	06099002301	1,958	0	0	10	88.7%	Low Resource	62.9%	22.9%	Lower Displacement Risk	90.0
Crows Landing	06099003400	519	0	0	5	74.4%	Low Resource	24.7%	7.7%	Lower Displacement Risk	90.4
Del Rio	06099000501	2,468	0	0	129	28.7%	High Resource	26.5%	1.6%	Lower Displacement Risk	95.1
Denair	06099003604	2,544	235	38	80	44.0%	High Resource	51.5%	3.5%	Lower Displacement Risk	69.8
Diablo Grande	06099003300	1,628	0	0	112	72.6%	Moderate Resource	35.9%	10.7%	Lower Displacement Risk	96.5
Empire	06099002002	1,329	56	55	43	61.0%	Low Resource	38.7%	4.2%	At Risk of Displacement	89.3
Grayson	06099003300	1,628	0	0	8	86.5%	Moderate Resource	35.9%	10.7%	Lower Displacement Risk	96.5
Hickman	06099002901	1,538	0	0	27	42.7%	Highest Resource	17.7%	3.1%	Lower Displacement Risk	75.1
North Ceres*	06099002702	1,967	17	0	2	79.9%	Low Resource	53.9%	15.9%	Lower Displacement Risk	72.9
	06099002302	1,145	111	60	11	84.0%	High Segregation & Poverty	72.6%	22.7%	1 Income Group Displacement	88.5
	06099002701	1,267	0	0	6	57.0%	Moderate Resource	49.7%	0.3%	Lower Displacement Risk	44.2
Oakdale	06099000101	1,780	0	0	22	17.2%	Highest Resource	27.9%	2.2%	Lower Displacement Risk	72.2
	06099000102	1,378	0	0	88	25.8%	Highest Resource	26.0%	1.6%	Lower Displacement Risk	90.8
	06099000203	3,150	0	0	58	28.9%	Moderate Resource	57.9%	8.5%	Lower Displacement Risk	87.0
Salida	06099000501	2,468	28	16	0	33.0%	High Resource	26.5%	1.6%	Lower Displacement Risk	77.8
	06099000510	2,543	0	7	0	73.2%	Moderate Resource	54.3%	4.4%	Lower Displacement Risk	77.8
South Ceres	06099002503	1,085	66	5	12	67.8%	Low Resource	49.8%	10.0%	At Risk of Displacement	77.5
	06099002602	1,551	14	0	0	70.0%	Low Resource	44.1%	6.8%	At Risk of Displacement	77.8
Turlock	06099003906	1,720	0	10	0	63.9%	Low Resource	60.2%	4.6%	At Risk of Displacement	47.1
Valley Home	06099000101	1,780	0	0	4	32.8%	Highest Resource	27.9%	2.2%	Lower Displacement Risk	72.3
West Modesto	06099001601	1,178	211	89	4	86.9%	High Segregation & Poverty	63.85	19.75	At Risk of Displacement	61.5
	06099001603	1,599	16	23	5	84.0%	Low Resource	66.7%	18.8%	1 Income Group Displacement	67.7
	06099001500	1,968	22	36	4	68.2%	Low Resource	52.5%	12.2%	Lower Displacement Risk	92.9
	06099002200	1,649	10	103	54	87.2%	Low Resource	61.9%	22.7%	2 Income Groups Displacement	84.9
Total			1,268	581	712						

Source: California Tax Credit Allocation Committee (TCAC)/California Housing and Community Development (HCD), Opportunity Maps (2020); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019).

*These CDPs are located between the City of Modesto and the City of Ceres and are collectively referred to as "South Modesto."

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Figure 3-57 Sites Inventory, Airport, TCAC Opportunity Areas

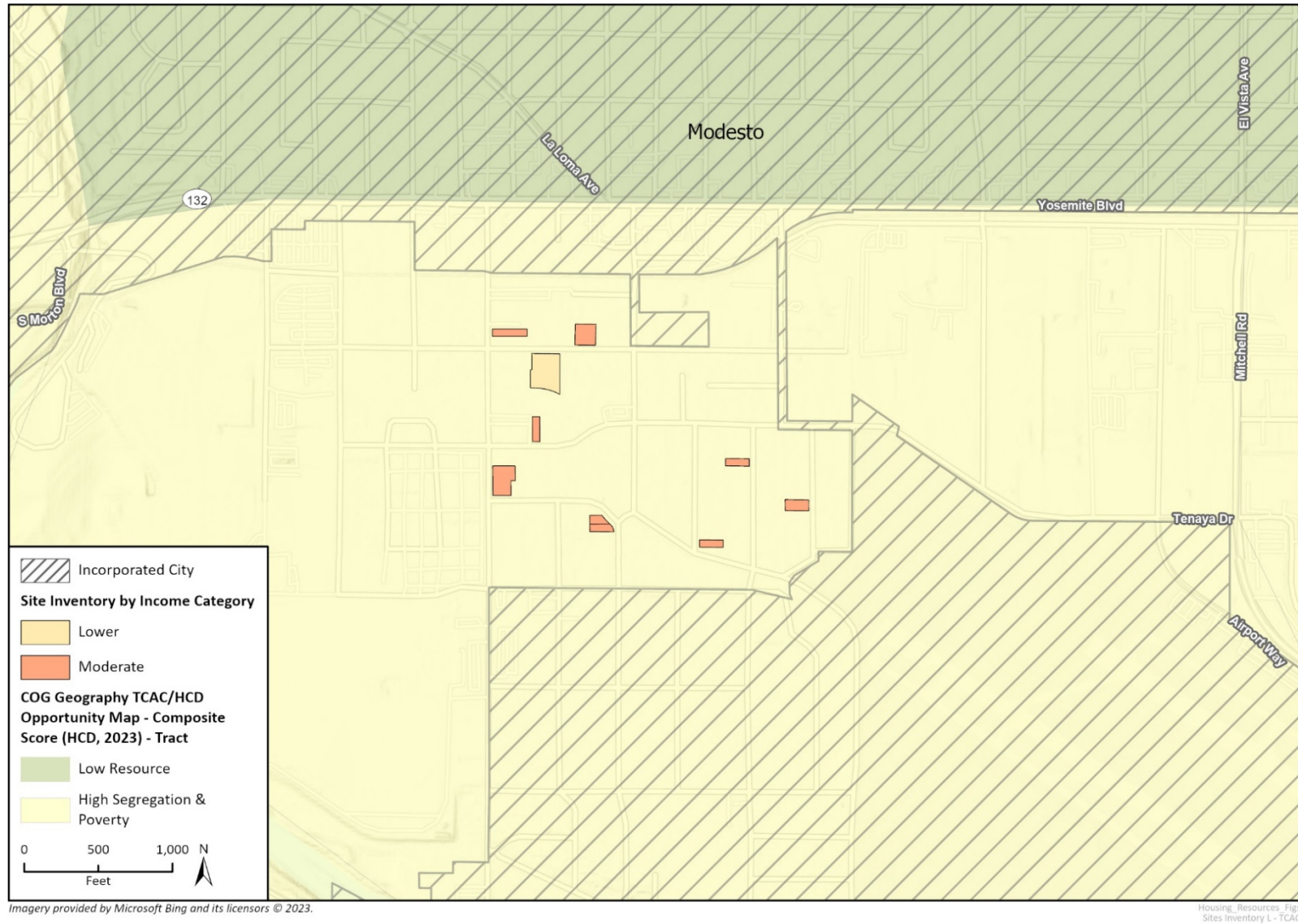


Figure 3-58 Sites Inventory, Bret Harte, TCAC Opportunity Areas

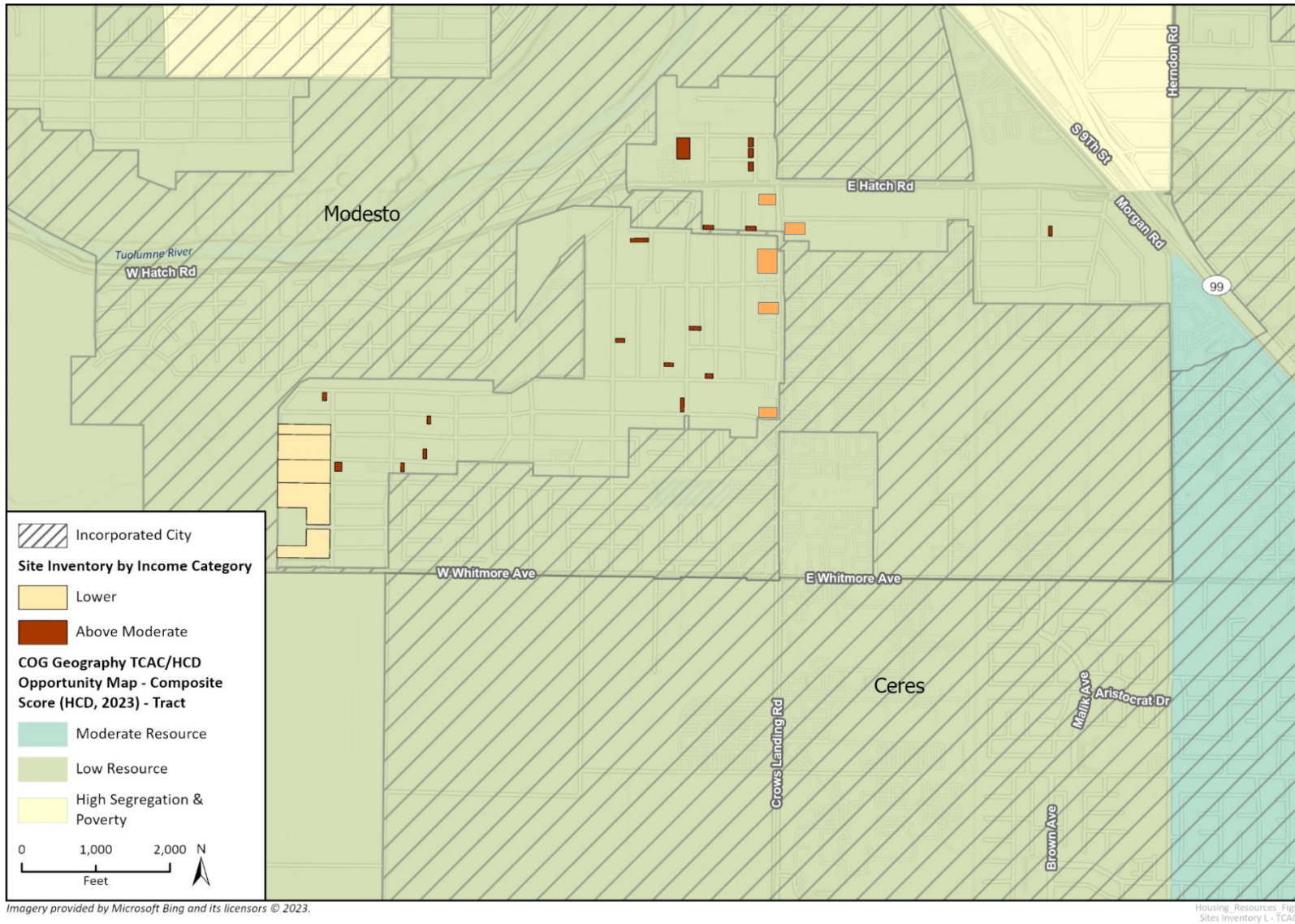


Figure 3-59 Sites Inventory, Crows Landing, TCAC Opportunity Areas

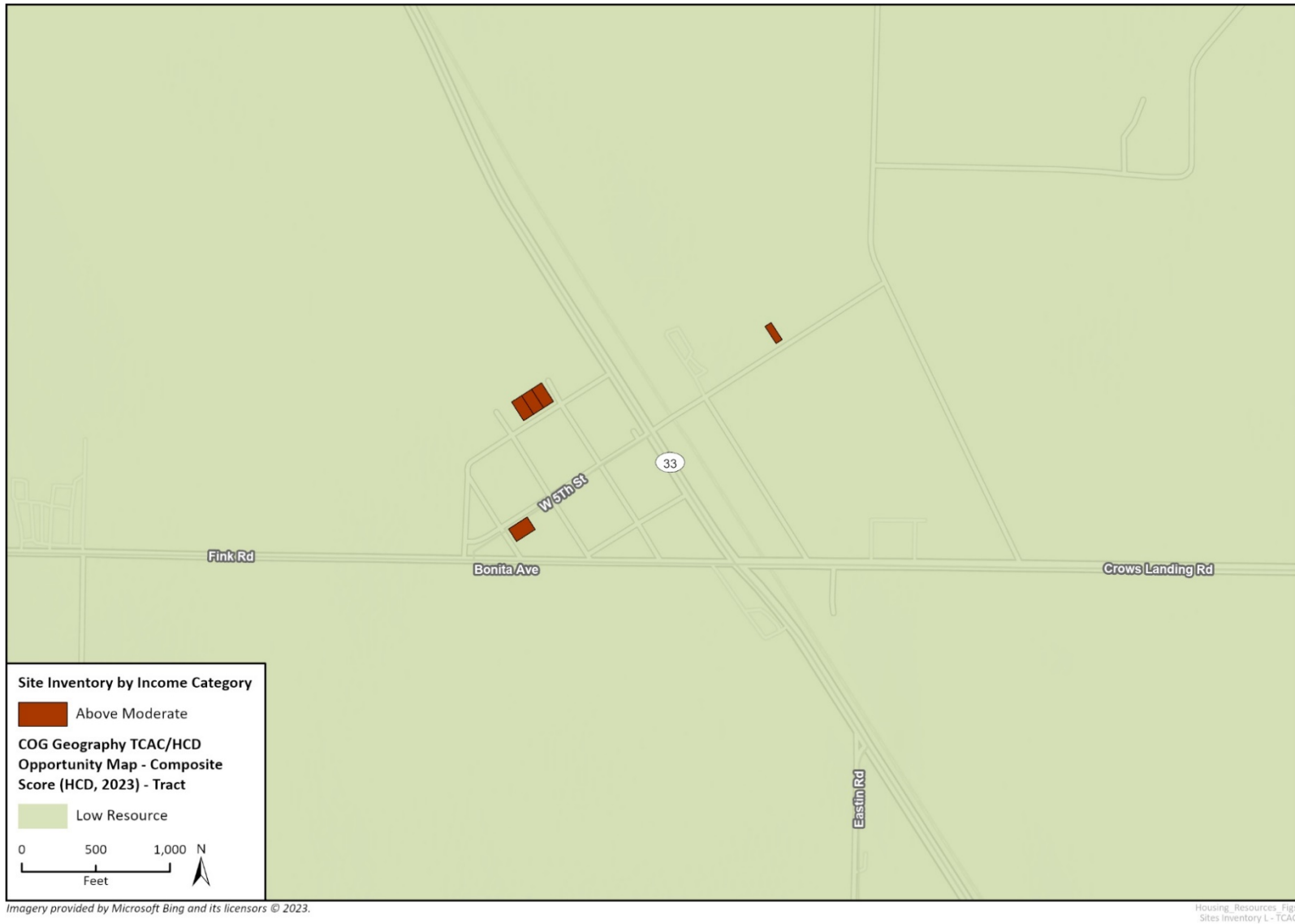


Figure 3-60 Sites Inventory, Del Rio, TCAC Opportunity Areas

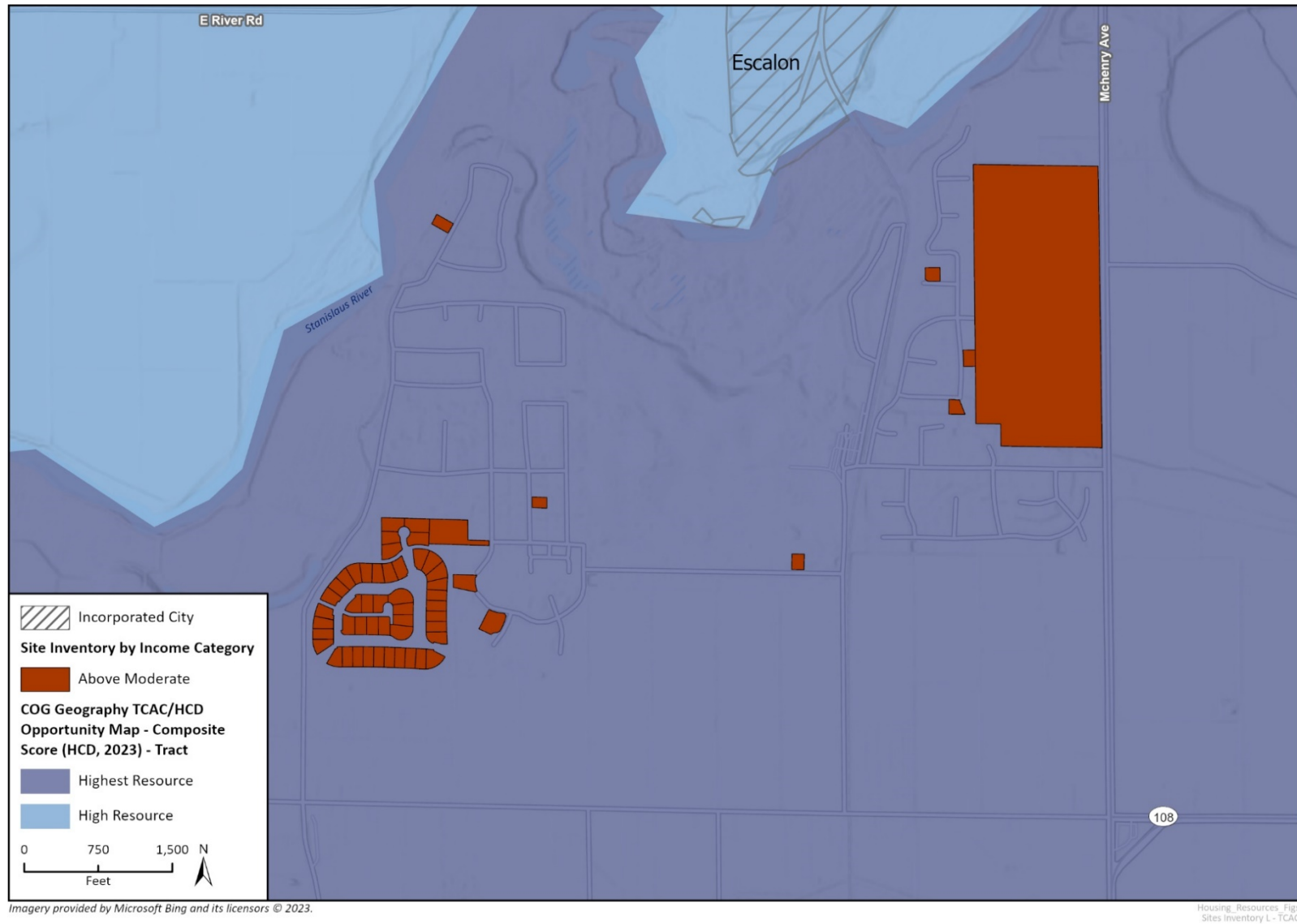


Figure 3-61 Sites Inventory, Denair, TCAC Opportunity Areas

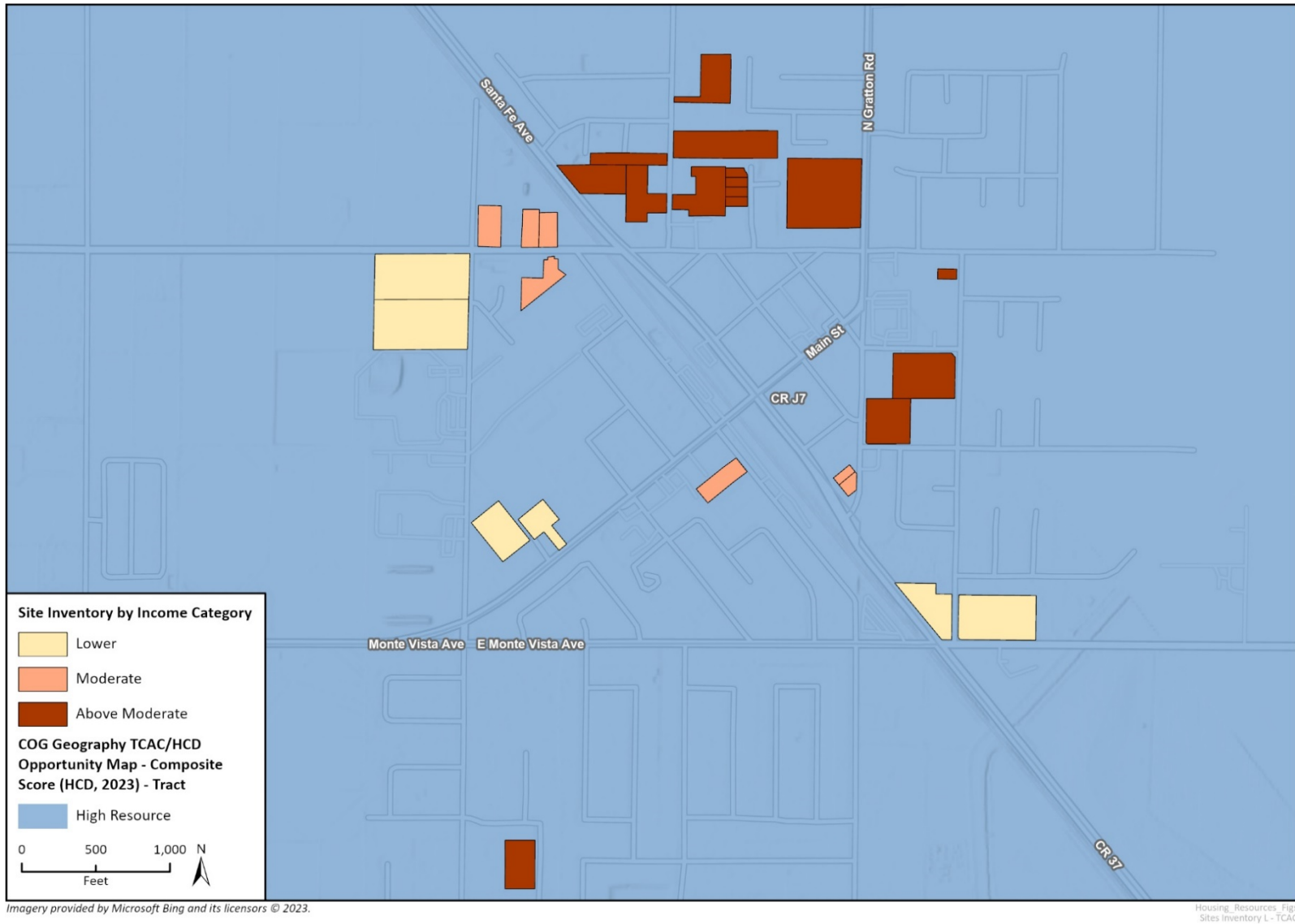
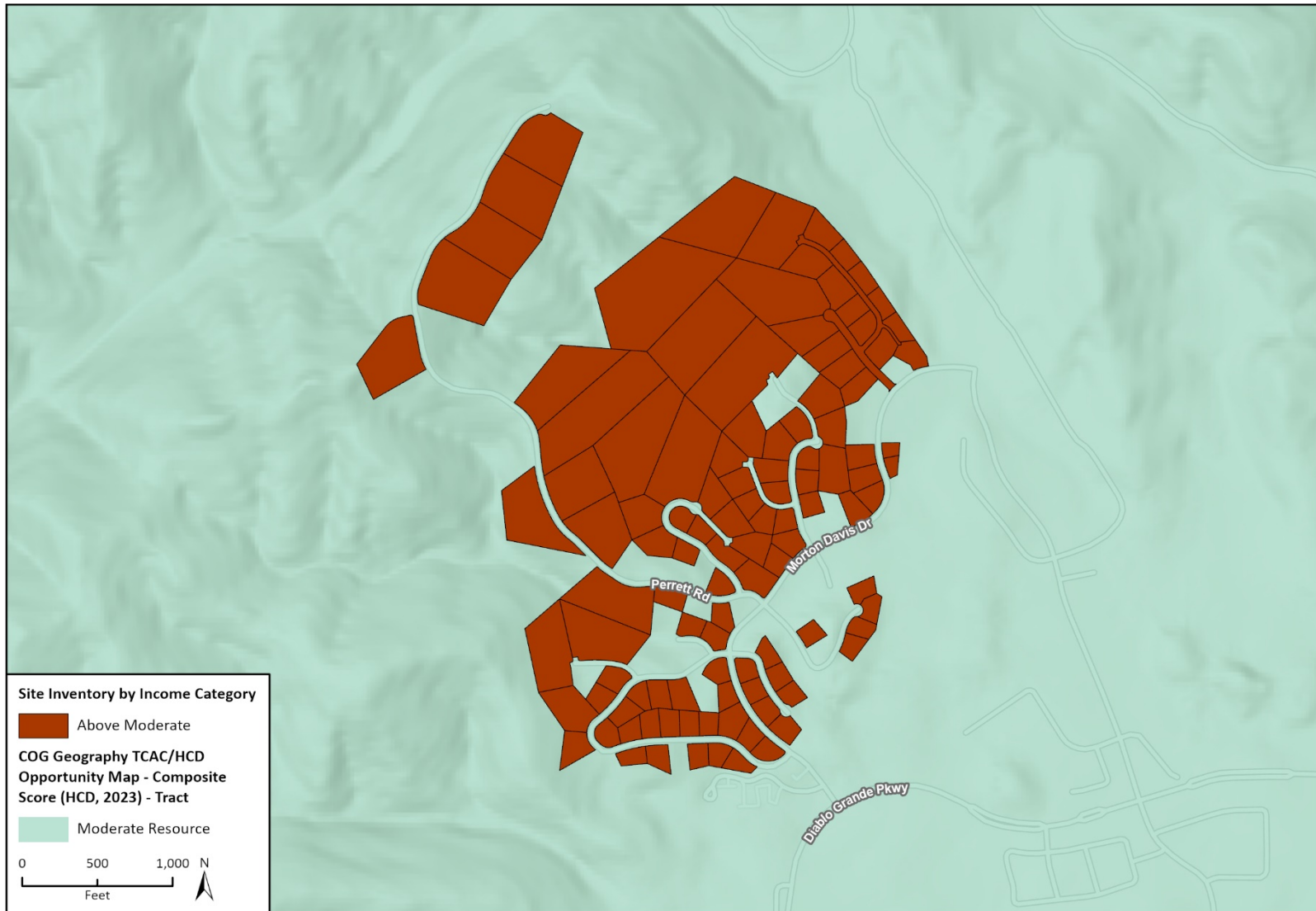


Figure 3-62 Diablo Grande Sites Inventory, TCAC Opportunity Areas



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Sites Inventory L - TCAC

Figure 3-63 Grayson Sites Inventory, TCAC Opportunity Areas



Figure 3-64 Sites Inventory, Hickman, TCAC Opportunity Areas



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Figure 3-65 Sites Inventory, Keys, TCAC Opportunity Areas

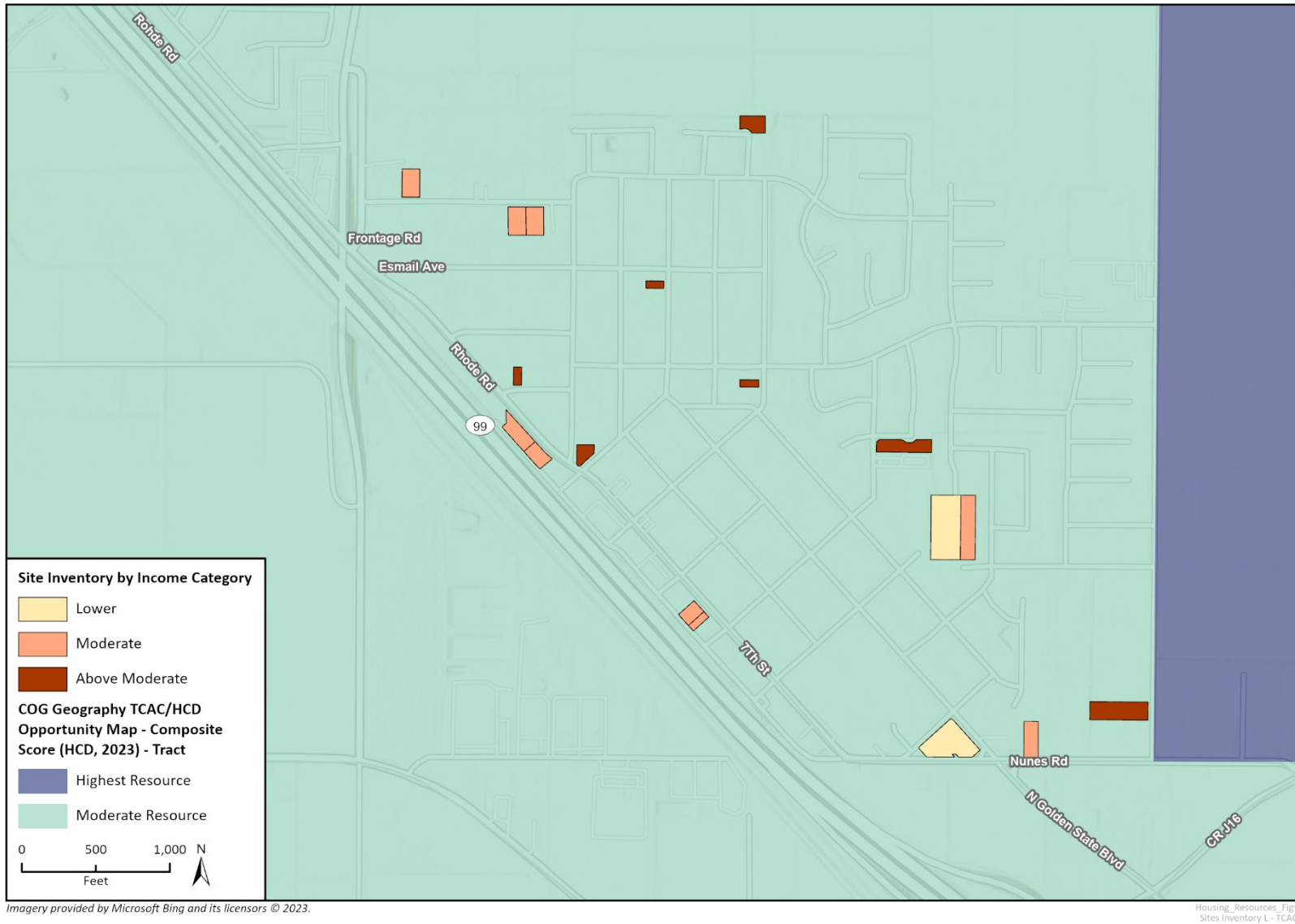


Figure 3-66 Sites Inventory, Empire, TCAC Opportunity Areas

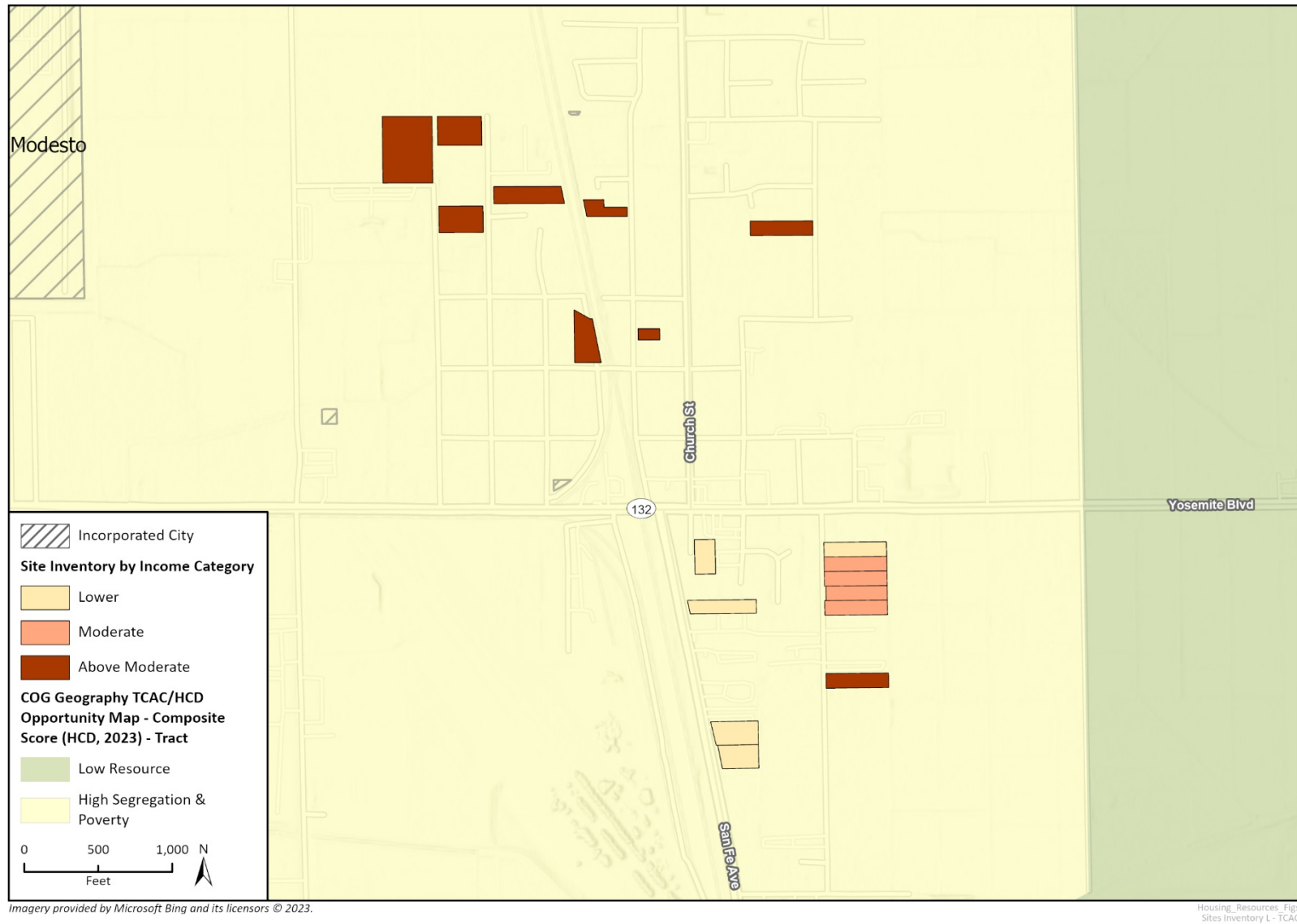


Figure 3-67 Sites Inventory, North Ceres, TCAC Opportunity Areas

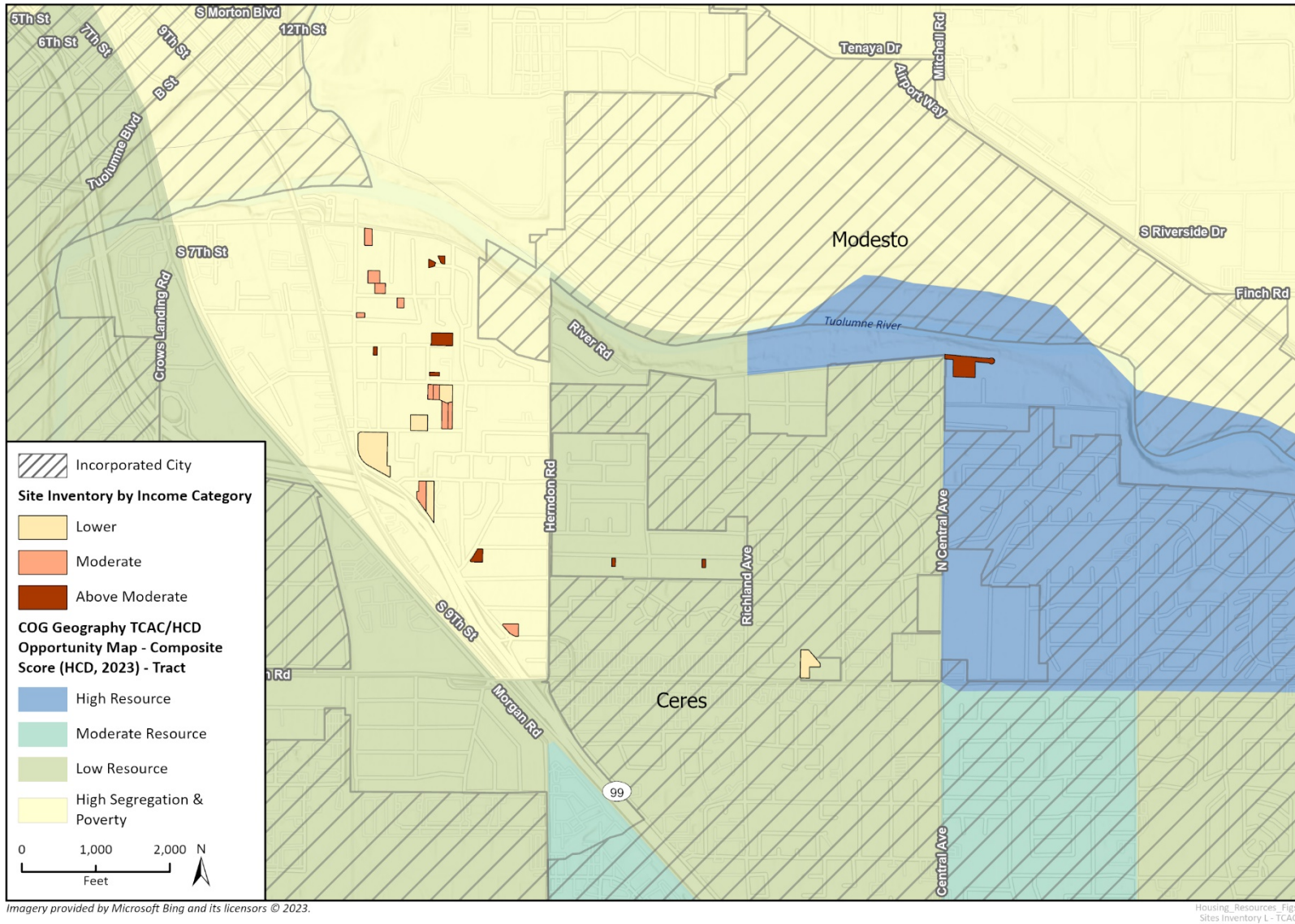
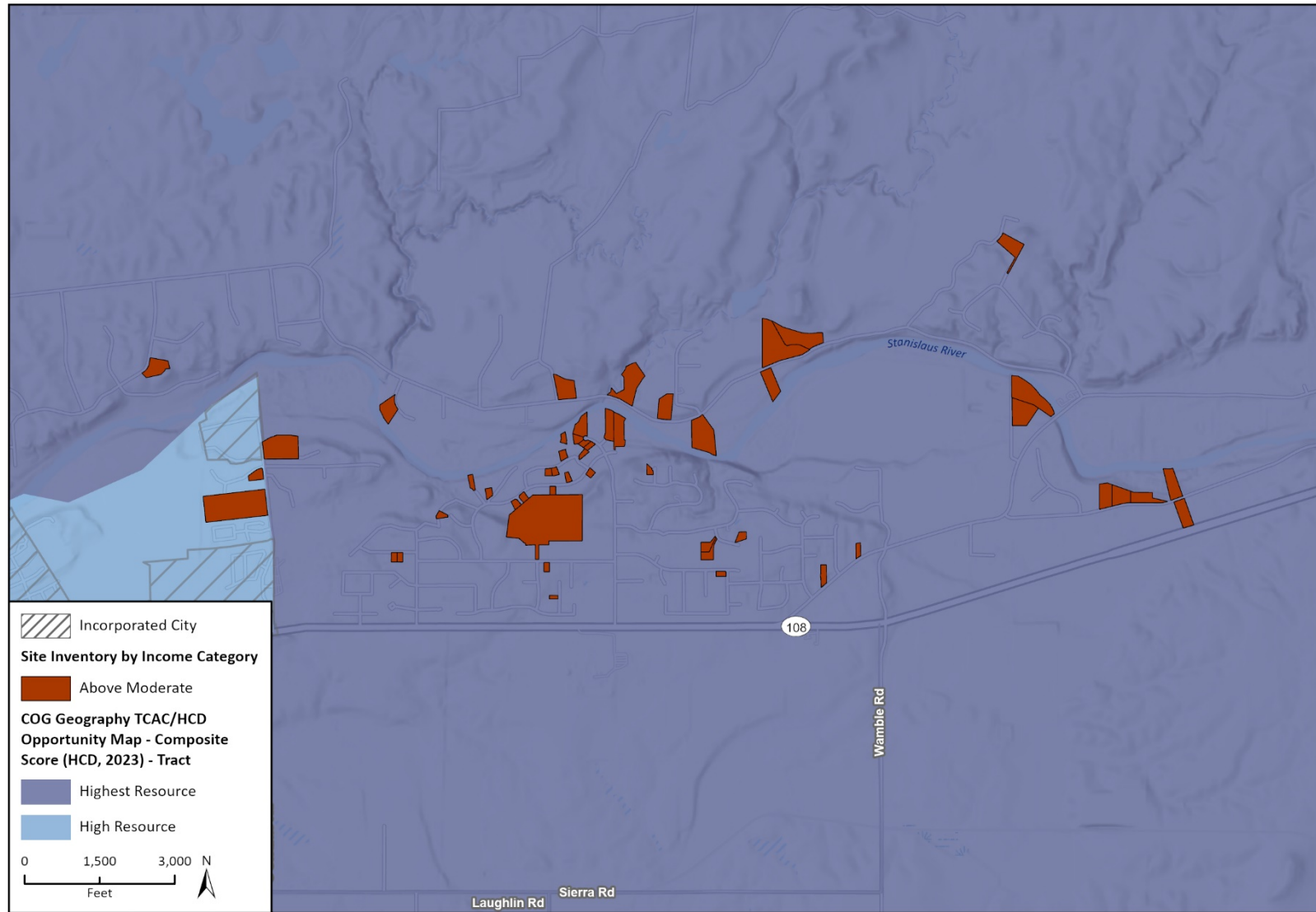


Figure 3-68 Sites Inventory, East Oakdale, TCAC Opportunity Areas



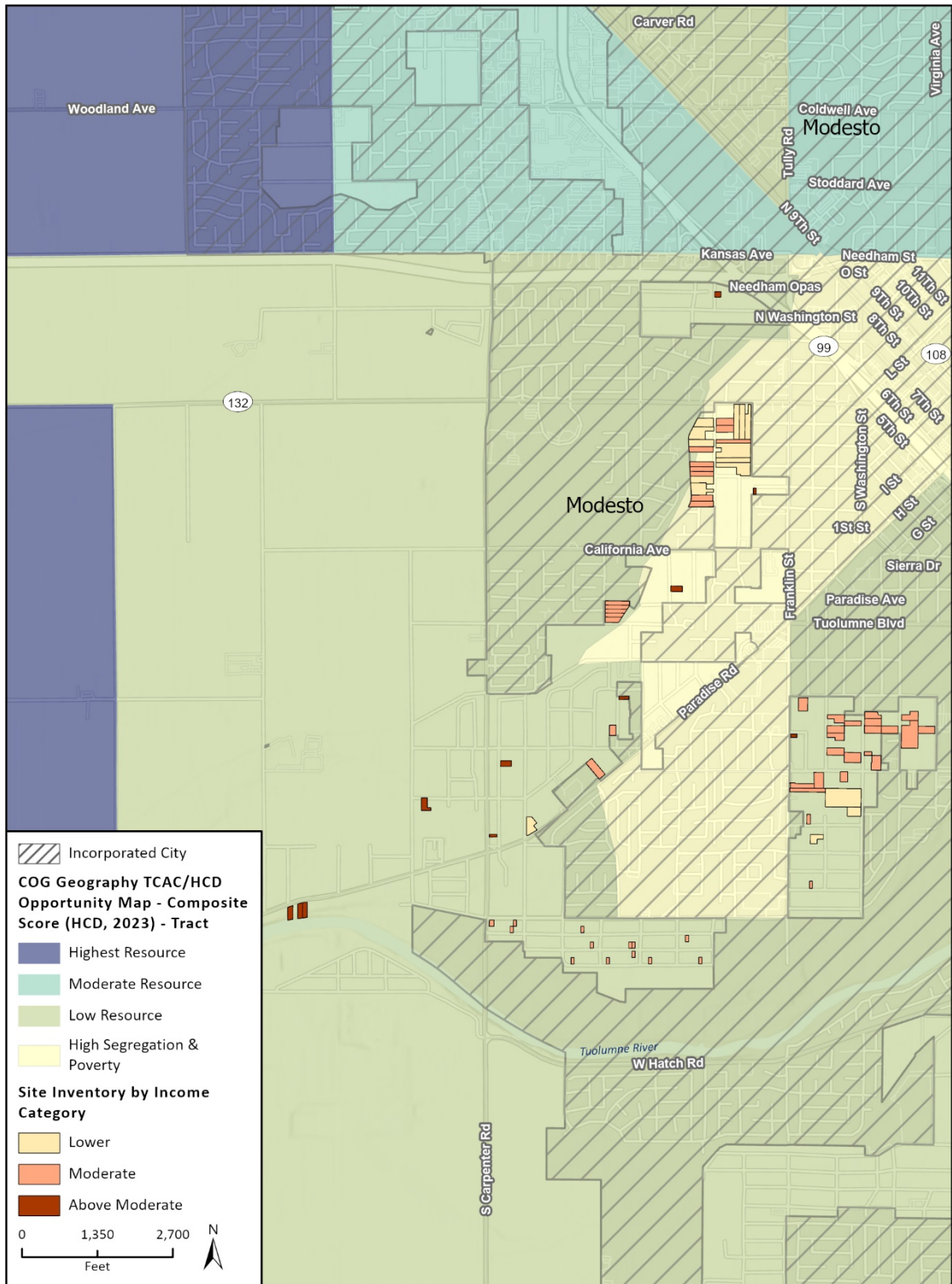
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Figure 3-69 Sites Inventory, Valley Home, TCAC Opportunity Areas



Figure 3-70 Sites Inventory, West Modesto, TCAC Opportunity Areas



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3.16.2 Improved Conditions

Of the CDPs with opportunity sites listed, the majority have low- and moderate-income households, predominantly Hispanic/Latino populations, and higher rates of housing problems. The sites that are currently allocated to the development of lower-income units are distributed throughout the neighborhoods of Airport, Bret Harte, Empire, Ceres, and West Modesto and not concentrated in any one location. In an effort to facilitate mixed-income neighborhoods, units of varying income designations are located in low-resource areas:

- 12 lower-income, and 32 moderate-income units are located in Airport;
- 419 lower-income, 51 moderate-income, and 24 above moderate-income units are located in Bret Harte;
- 5 above moderate-income units are located in Crows Landing;
- 56 lower-income, 55 moderate-income, and 43 above moderate-income units are located in Empire;
- 128 lower-income, 25 moderate-income, and 19 above moderate-income units are located in North Ceres;
- 80 lower-income, 5 moderate-income, and 12 above moderate-income units are located in South Ceres;
- 10 moderate-income units are located in Turlock;
- 259 lower-income, 251 moderate-income, and 67 above moderate-income units are located in West Modesto.

Further development of moderate- and above moderate-income units in these low-resource areas would potentially improve conditions by encouraging a mix of household income levels. Areas with access to public utilities (water and sewer), access to transportation, and proximity to schools are best suited to higher-density developments. The County will continue to implement residential rehabilitation programs, affordable housing development incentives, anti-displacement actions, and utilize annual CDBG and HOME funds to improve conditions within low-resource and displacement-vulnerable census tracts shown on Figure 3-51.

3.16.3 Exacerbated Conditions

This AFFH analysis has shown that areas of low resource in Stanislaus County are more likely to have a predominant Hispanic/Latino population, a greater share of overcrowded households, and higher rates of poverty compared to neighborhoods in moderate-resource areas. The sites located in the CDPs of Airport, North Ceres, and West Modesto each have sites in areas of high segregation and poverty. The Site Inventory identified sites to accommodate all income levels in these areas with capacity for 334 low-income, 181 moderate-income, and 15 above moderate-income housing units. West Modesto has the highest poverty level with 38 percent of the population whose income in the past 12 months was below the poverty level. The site located in this area can accommodate 259 low-income, 251 moderate-income, and 67 above moderate-income housing units. By encouraging a mix of lower-, moderate-, and above moderate-income housing units, the Sites Inventory does not exacerbate conditions in vulnerable areas of the county, while still providing affordable housing where it is needed.

3.16.4 Racially/Ethnically Concentrated Areas of Poverty and Affluence

There are five census tracts listed as R/ECAP areas in Stanislaus County, and these areas overlap with three CDPs: Airport, Rouse, and Bret Harte. These CDPs are also located in areas with predominantly Hispanic/Latino residents and elevated rates of poverty. Feasible sites were found in both Airport and Bret Harte. The number of units within each of these CDPs by income group is:

- Airport: 12 lower-income and 32 moderate-income units
- Bret Harte: 419 lower-income, 28 moderate-income, and 24 above moderate-income housing units

In contrast, the CDPs of East Oakdale, Orange Blossom, Knights Ferry, Valley Home, Denair are considered racially concentrated areas of affluence. These are areas of Stanislaus County where predominately non-Hispanic white population and generally higher median incomes are located. Sites feasible to accommodate different income levels are in East Oakdale, Valley Home, and Denair. These CDPs have the following number of units per income category:

- East Oakdale: 168 above-moderate income housing units
- Valley Home: 4 Above-moderate income housing units
- Denair: 235 lower-income, 38 moderate-income, and 80 above-moderate income housing units

Overall, there is a total of 1,228 lower-income, 471 moderate-income, and 358 above-moderate income housing units identified in the sites inventory that are located in areas where the population is predominantly Hispanic/Latino.

3.16.5 Access to Opportunity

The majority of CDPs in Stanislaus County were categorized as low resource while tracts in highest- and high-resource areas are found in the northeastern portion of the county. Housing units in the sites inventory are not disproportionately concentrated in different resource areas, and the sites identified in low-resource areas are distributed on vacant and underutilized parcels and facilitate the development of lower-, moderate-, and above moderate-income units close to commercial services and transit. The County's goals, policies, and programs implemented as part of this housing element will mitigate impediments to opportunity and promote investment in specific neighborhoods and expand affordable housing supply (see Chapter 6, Housing Plan).

3.16.6 Disproportionate Housing Needs

The highest percentage of both cost-burdened households are located in the South Modesto CDPs, as seen in Figure 3-42. Similarly, as shown in Figure 3-46, an elevated percentage of overcrowded households exists within the South Modesto CDPs. The combination of the two CDPs in South Modesto, Bret Harte and West Modesto results in an estimated capacity of 678 lower-income, 302 moderate-income units, and 91 above moderate-income housing units to be built. Providing more affordable housing opportunities in these areas may lower levels of cost burden in these CDPs.

The fair housing assessment found a need for affordable housing for people with disabilities and adequate housing for large families. Funds and programs to assist private developers with the cost of development of units affordable to low- and moderate-income households, persons with disabilities, and large families are discussed in Chapter 6, Housing Plan.

3.16.7 Subsidized Housing

As discussed in Section 3.10 Location of Affordable Housing, Stanislaus County has a range of publicly assisted rental housing affordable to lower and moderate-income households within its incorporated cities, and none in unincorporated communities. Overall, there is a concentration of HCV recipients or subsidized housing projects in the South Modesto CDPs, as seen in Figure 3-56. Sites identified as adequate for lower-income housing are located in the South Modesto CDPs where HCV recipients represent between 1.9 and 17.1 percent of renter-occupied housing units. The development of lower-income housing units on the sites identified in the site inventory do not create an unusually high concentration of lower-income units near existing affordable housing projects or in neighborhoods with high concentrations of housing choice voucher recipients.

3.17 Identification and Prioritization of Contributing Factors

State law (AB 686) requires identification and prioritization of contributing factors to fair housing issues based on all the previously required analysis. Contributing factors are those that contribute to, perpetuate, or increase the severity of one or more fair housing issues. This identification and prioritization must give highest priority to factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights. AB 686 also requires identification of metrics or quantified objectives and milestones for determining what fair housing results will be achieved. Programs, quantified objectives, and milestones are detailed in the Housing Plan.

High Priority

- **Need for Additional Public and Private Investments in Specific Neighborhoods.** The range of resource scores for unincorporated communities is wide ranging, according to the TCAC opportunity maps. Especially where inventory sites to accommodate lower-income housing are located, the County will take actions under the following program to promote equitable investments (and public investments that can spur private investments) in unincorporated communities:
 - Program 1-1: Home Rehabilitation Program
 - Program 2-4: Support Homeownership Opportunities
 - Program 3-9: Infrastructure
- **Low Supply of Affordable Housing.** This analysis, alongside input from community feedback, identified there not being enough affordable housing units throughout the county to accommodate households in need. Low-income households are not able to secure affordable housing even with the assistance of HCVs due to low supply. In addition, low-income households are disproportionately affected by housing problems, including overpayment, compared to moderate- and above moderate-income households, indicating they are in need of more affordable housing options. The following programs will address low affordable housing supply:
 - Program 1-1: Home Rehabilitation Program
 - Program 2-1: Affordable Housing Development Assistance
 - Program 2-2: Density Bonus
 - Program 3-4: By-Right Approval for Projects with 20 Percent Affordable Units
 - Program 3-9: Infrastructure

- **Location and Type of Affordable Housing and Land Use and Zoning Laws.** The majority of the unincorporated county's existing housing stock is single-family residences, limiting residents' choice of housing type and cost. Expanding housing opportunities through zoning regulations and other programs like home-sharing could improve access in all neighborhoods. Programs addressing this issue include:
 - Program 2-3: Housing Choice Vouchers
 - Program 3-1: Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth
 - Program 3-6: Zoning for a Variety of Housing Types
 - Program 3-8: Accessory Dwelling Units

Moderate Priority

- **Special Needs Housing.** The unincorporated county has a slightly disproportionately larger senior and disabled population than the incorporated cities. Due to the special needs of these populations, the County will take actions to enhance housing opportunities for seniors, persons with disabilities, and female-headed households:
 - Program 3-6: Zoning for a Variety of Housing Types
 - Program 4-1: Housing for Special Needs Populations
- **Housing for Persons Experiencing Homelessness.** There is a shortage of housing for persons experiencing homelessness, and programs that will facilitate temporary, transitional, supportive, and permanent housing for persons experiencing homelessness include:
 - Program 3-6: Zoning for a Variety of Housing Types
 - Program 4-1: Housing for Special Needs Populations
 - Program 4-3: Homelessness
- **Fair Housing Resources.** Community members and stakeholders reported that increased access to fair housing information is necessary. The following programs will address this issue:
 - Program 5-1: Affirmatively Furthering Fair Housing and Environmental Justice
 - Program 5-2: Fair Housing Services
- **Access to Transit.** The AFFH Data Viewer identified that high quality transit stops are primarily located within incorporated cities and that unincorporated communities, including those adjacent to cities, do not have any high-quality transit stops. Community feedback supported these findings, with community members expressing that public transit is unreliable in unincorporated communities. Affordable housing in proximity to transit was expressed as a priority to community members. Programs that site affordable housing near opportunity areas include:
 - Program 3-9: Infrastructure

Low Priority

- **NIMBYism and Public Perception of Housing Development.** Public opposition to housing development in some unincorporated communities can be strong. The County will establish public outreach campaigns to reduce opposition to housing development generally through the following programs:
 - Program 4-4: Community Outreach and Education

- **Access to Financial Services.** Residents of unincorporated Stanislaus County struggle to secure financing for home ownership, particularly nonwhite residents. The following programs will help to increase access to financial resources:
 - Program 2-4: Support Homeownership Opportunities
- **Displacement.** Residents in the southern part of the unincorporated county (South Modesto, Empire, and Crows Landing) are particularly susceptible to displacement, with South Modesto communities facing the most displacement pressure. The following programs will address displacement risk:
 - Program 3-3: Replacement Housing
 - Program 5-3: Displacement Prevention

There are a few key overarching, meaningful outcomes with metrics that can be used to measure progress and effectiveness of the overall effort and combined impact of programs to improve fair housing results. Table 3-18 defines overarching outcomes and metrics for all the Fair Housing Strategies. Outcomes focus on ensuring lower-income households have housing mobility, including in high-resource areas; preventing displacement for vulnerable households; and improving neighborhood conditions in low-opportunity areas.

Table 3-18 AFFH Programs by Category

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
Fair Housing Outreach and Enforcement	Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.	Review policies and procedures for community development and housing assistance programs	By December 2026 and make necessary changes within six months.
	Action 5-1g: Offer training to County staff on a variety of topics included in the County’s Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)	Beginning 2025, offer training sessions annually during the planning period.	Annually
Housing Mobility	Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities	Seek funding as applicable Notices of Funding Availability (NOFA) become available	Annually
Anti-Displacement	Action 5-1e: Modify funding policies, if necessary, to allow the use of r eligible State and/or Federal funding to repair failing septic systems.	Modify funding policies	By June 2025

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Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
New Housing Choices in High Opportunity Areas	Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC).	Review an individual institution’s most recent Home Mortgage Disclosure Act (HMDA) reporting as most recently published by the Federal Financial Institutions Examination Council (FFIEC).	Ongoing - Annually
	Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6th Cycle Housing Element planning period.	Apply for Prohousing designation	By June 2025.
Place-Based Strategies for Community Improvement	Action 5-1c: Assess the feasibility of allowing a variety of home-based economic opportunities in residential neighborhoods, e.g., micro-kitchens, day cares, and home occupations.	For those opportunities determined feasible, establish a plan to Amend County Code	By June 2025.

4 Housing Constraints

State housing element law requires the County to identify and analyze potential and actual governmental and non-governmental constraints to the maintenance, improvement, or development of housing for all income levels, including housing for people with disabilities. The analysis is required to identify specific standards and processes within the purview of government and evaluate their impact on the supply and affordability of housing. The analysis below determines whether local regulatory standards pose an actual constraint and demonstrates local efforts to remove constraints that hinder the County from meeting its housing needs. Stakeholder input informed the analysis. The County met with developers and representatives of organizations serving persons with disabilities, persons experiencing homelessness, and other residents of the county to identify governmental and nongovernmental constraints to the development of housing and the provision of services for lower-income or special needs populations (More information on stakeholder interviews and community outreach can be found in Appendix A.)

4.1 Governmental Constraints

Local governments have little or no influence on federal monetary policies or national economic forces; yet these factors carry substantial weight on the overall cost of housing. The local housing market, however, can be encouraged and assisted locally. Part of the housing element's purpose is to require local governments to evaluate their past performance in this regard. By reviewing local conditions and regulations that may impact the housing market, the local government can prepare for future growth through actions that address housing needs for its population, address public health and safety, and facilitate reducing the cost of housing production.

Stanislaus County's primary policies and regulations that affect residential development and housing affordability include the following: land use controls, development processing procedures and fees, impact fees, on- and off-site improvement requirements, building and housing codes, and code enforcement. This section discusses these policies and regulations and assesses whether any serve as a governmental constraint to the production of housing.

As part of the governmental constraints analysis, the housing element must also analyze potential and actual constraints upon the development, maintenance, and improvement of housing for persons with disabilities. Additional analysis of these constraints is included at the end of this section.

4.1.1 General Plan and Zoning Ordinance

The Stanislaus County General Plan and Zoning Ordinance establish allowable land use types, amount, and distribution of various uses throughout unincorporated Stanislaus County, including the distribution of housing and intensity of residential development. Incorporated cities are governed by their own regulatory documents. These policy and regulatory controls guide growth and development for the future. The discussion that follows focuses generally on the intent of these controls and their impact on the production of housing.

General Plan Land Use Designations

The Stanislaus County General Plan is a comprehensive, long-term guide for development in the unincorporated areas of the county. The General Plan elements should be comprised of integrated, internally consistent, and compatible policy objectives. The 2015 comprehensive update to the Stanislaus County General Plan established a 20-year planning horizon to 2035. The Land Use Diagram sets broad guidance for land use development. As summarized in Table 4-1, the Land Use Element establishes four residential land use designations and one commercial land use designation that permits all allowable residential use types. According to the General Plan Land Use designations, single-family dwellings are also allowed, with limitations, on land designated primarily for agricultural and industrial land uses.

Table 4-1 Land Use Designations Permitting Residential Uses

General Plan Designation	Compatible Zoning Ordinance Classification	Allowable Residential Use	Maximum Dwelling Units per Acre
Residential			
Estate Residential	R-A (Rural Residential) PD (Planned Development)	Single-family dwelling; Accessory dwelling unit	1 dwelling unit per 3 acres
Low-Density Residential	R-A (Rural Residential) R-1 (Single Family Residential) PD (Planned Development) US (Urban Service combining district in conjunction with the above zones)	Single-family dwelling, Mobile home, Accessory dwelling unit, and Mobile home parks with a use permit.	8 dwelling units per acre (if served by community services or sanitary sewer district), 2 dwelling units per acre (if not served by public water and sewer service)
Medium-Density Residential District	R-2 (Medium-Density Residential) PD (Planned Development)	Single-family dwelling, Second dwelling unit, Duplexes, Mobile home in lieu of any permitted single-family, dwelling groups with use permit, and Mobile home parks with a use permit.	14 dwelling units per acre
Medium High-Density Residential	R-3 (Multiple-Family Residential) PD (Planned Development)	Single-family dwelling (two dwelling units are permitted on the first six thousand square feet of a lot with one additional unit permitted for each additional fifteen hundred square feet of the lot to a maximum density of 25 units per net acre), Accessory dwelling units, Apartment house, Dormitory, fraternity/ sorority house, Rooming or boarding house, Orphanage or residential care home, Mobile home in lieu of a permitted single-family dwelling, and Mobile home parks with a use permit.	25 dwelling units per acre

General Plan Designation	Compatible Zoning Ordinance Classification	Allowable Residential Use	Maximum Dwelling Units per Acre
Commercial			
Commercial	C-1 (Neighborhood Commercial) C-2 (General Commercial) H-1 (Highway Frontage Commercial)	Apartment houses, Two-family dwellings or duplexes, Residential care homes, Convents, Mobile homes, Single-family dwellings or one apartment if it is accessory to a permitted commercial use, Emergency shelters (H-1 and C-2), and Mobile home parks with a use permit.	25 dwelling units per acre
Industrial			
Industrial	LM (Limited Industrial) M (Industrial) PI (Planned Industrial) PD (Planned Development)	One single-family dwelling or one apartment if accessory to a permitted commercial or industrial use.	1 unit per parcel
Planned Industrial	A-2 (General Agriculture) PI (Planned Industrial) LI (Light Industrial) IBP (Industrial Business Park) SCP-PI (Salida Community Plan, Planned Industrial) all industrial or business park related PD (Planned Development)	One single-family dwelling or one apartment if accessory to the industrial use, or accessory to crop farming.	1 unit per parcel
Agricultural			
Agriculture	A-2 (General Agriculture) PD (Planned Development)	20 acres or more: Up to two dwelling units (single-family dwellings or one single-family dwelling and one accessory dwelling unit) One to less than 20 acres: One single-family dwelling and one accessory dwelling.	2 dwelling units per 3, 5, 10, 20, 40, or 160 acres (appropriate corresponding A-2 zone)

Source: Stanislaus County General Plan, 2015

Community Plans

Included in the Land Use Element are nine community plans (Crows Landing, Del Rio, Denair, Hickman, Keyes, Knights Ferry, La Grange, Salida, and Westley) for unincorporated communities in Stanislaus County. By and large, the land use designations in these plans align with the zoning designations with some exceptions and include policies related to housing production. The communities with the greatest potential for residential development are Denair, Keyes, and Salida.

Denair Community Plan

The Denair Community Plan was adopted December 15, 1998, and encompasses a land area of 1,013 acres. Higher-density residential development is located near the downtown commercial core. Measure E, discussed further in Section 4.1.9, Growth Management, applies to agricultural land within the Community Plan area, and may present some barriers to housing development.

Keyes Community Plan

The Keyes Community Plan was adopted April 18, 2000, and encompasses a land area of 857 acres. New residential development is targeted for the community’s northern and eastern areas. Measure E, discussed further in Section 4.1.9, Growth Management, applies to agricultural land within the Community Plan area, and may present some barriers to housing development.

Salida Community Plan

The Stanislaus County Board of Supervisors passed an ordinance on August 7, 2007, to implement the Salida Area Planning “Roadway Improvement, Economic Development and Salida Area Farmland Protection and Planning Initiative,” also known as the “Salida Initiative,” which amended the Salida Community Plan (SCP). The amended SCP provides land use planning and guidance for development of approximately 4,600 acres of land in the Salida area. SCP encompasses the existing community of Salida, which was part of the previously approved SCP (Existing Plan Area), and an amendment area encompassing approximately 3,383 acres (Amendment Area).

The plan area is divided into seven land use designations and is unique from the other community plan documents because it establishes sub-zoning districts that implement the General Plan land use designations. Table 4-2 summarizes the residential land use designations and corresponding zoning districts for the SCP. The table shows the allowable types of residential use, maximum dwelling units per acre and projected average dwelling units per acre. These zone districts allow higher residential density than other unincorporated areas. The SCP was adopted by the Board of Supervisors without environmental review, which was allowed at the time for initiatives. Environmental review is required for build out of the SCP.

Table 4-2 Salida Community Plan Land Use Designations Permitting Residential Uses

General Plan Designation	Compatible Zoning Ordinance Classification	Allowable Residential Use	Maximum Dwelling Units per Acre	Projected Average Dwelling Units per Acre
Low-Density Residential	SCP-R-1	Single Family homes	8 dwelling units per acre	4.5 dwelling units per acre
Low-Density Residential-Special Treatment Area	SCP-R-1- ST	Single Family homes	8 dwelling units per acre	N/A
Medium-Density Residential	SCP-R-2	Detached single-family homes, duplexes, and triplexes	14 dwelling units per acre	10 dwelling units per acre
Medium High-Density Residential	SCP-R-3	Multifamily homes	25 dwelling units per acre	23.4 dwelling units per acre

Source: Stanislaus County General Plan, 2015

Overall, the SCP was projected to have a build-out of about 5,000 dwelling units. The SCP created capacity for lower-income households, by way of expanded area for the development of higher-density housing. The standards outlined in the SCP allow for more flexibility in housing types beyond the single-family home. As an example, unlike other areas of the County where the Medium Density Residential (R-2) district has a minimum lot size of 6,000 square feet, the medium-density SCP-R-2 district in the Salida Community Plan allows lots between 2,000 and 3,000 square feet and has the capacity for two to three times the number of units than the standard R-2 zone. The Medium-High-Density SCP-R-3 district allows for row houses, townhomes, condominiums, and apartments at 25 units per acre and excludes allowance for single-family housing.

The SCP also establishes different development standards for height limits, lot coverage, and setbacks. For example, the SCP zones have a higher height limits but greater minimum rear yard setbacks as shown in Table 4-5 in Section 4.1.4. Despite having standards that better accommodate a range of housing types and policies that support future housing development, that development has not been realized. Development in the SCP is still required to undergo CEQA analysis, and Infrastructure to serve the amendment area of the Salida Community Plan is unknown and has not been evaluated, discussed further in Section 4.3, *Infrastructure Constraints*. Under Program 2.1g, the County would explore funding for CEQA review for the Salida Community Plan to facilitate housing development.

The General Plan provides opportunities for housing in both residential and non-residential land uses such as in the Agricultural and Commercial land use categories. Additionally, the SCP accommodates a broader range of housing development opportunities, though residential development in the area is limited by infrastructure constraints. Overall, the General Plan accommodates an appropriate range of residential land use types within its land use designations and does not create constraints for housing development.

4.1.2 Zoning Ordinance

The following discussion reviews the types and density of housing permitted and relevant development standards in the Stanislaus County Zoning Ordinance.

Residential Districts and Permitting

The Stanislaus County Zoning Ordinance has four residential zone districts: Rural Residential (R-A), Single-Family Residential (R-1), Medium Density Residential (R-2), and Multiple-Family Residential (R-3). Table 4-3 shows the residential zone districts in relation to the minimum lot area and maximum residential density. The densities allowed by the Zoning Ordinance do not reflect Senate Bill 9 legislation, approved in 2021, which requires ministerial approval of up to four housing units in areas typically used for one single-family home. Likewise, accessory dwelling units allowed by state law are not counted in residential density.

Table 4-3 Residential Zone Districts

Zoning District	Minimum Residential Lot Area	Maximum Residential Density
R-A Rural Residential	3 acres (Estate Residential General Plan) 8,000 square feet (Low Density Residential General Plan)	1 dwelling unit per 3 acres 1 ADU
R-1 Single Family Residential District	5,000 square feet	8 dwelling units/acre (if served by community services or sanitary sewer district) 2 dwelling units/acre (if not served by public water and sewer service) 1 ADU
R-2 Medium Density Residential District	6,000 square feet	14 dwelling units/acre 1 ADU
R-3 Multiple Family Residential District	6,000 square feet	25 dwelling units/acre ADUs at 25% of existing units (2 detached ADUs where there are multiple existing units)

1. Zoning densities do not reflect recent state laws that permit Accessory Dwelling Units (ADUs) in single-family zones.
2. Minimum lot area applies when serviced to two public facilities (exception is R-A Estate Residential). Where serviced by public water and septic tank facilities or private well and public sewer facilities minimum lot area is 20,000 square feet. Where serviced by private well and septic facilities minimum lot area is one acre.

Source: Stanislaus County Zoning Ordinance, 2022. Stanislaus County Local Agency Management Plan (LAMP), 2017.

4.1.3 Zoning for a Variety of Housing Types

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all economic segments of the population. Persons and households of different ages, types, incomes, and lifestyles have a variety of housing needs and preferences that evolve over time and in response to changing life circumstances. This includes single-family homes, multiple dwelling units, accessory dwelling units, mobile homes, agricultural employee housing, homeless shelters, and transitional housing, among others. An overview of different housing types is provided below.

Residential allowances are not expressed in a single land use table, rather, they are discussed within each respective section of the zoning code and recognized under the following types of administrative and discretionary permit requirements:

- **Permitted Uses.** Permitted uses are ministerial and require a building permit be issued by the County. The building permit application must be accompanied by plans and pertinent information showing how the application for the use meets required standards. This is a ministerial process that involves County staff review of a proposed development to ensure that all applicable zoning requirements, and other County adopted standards, are satisfied. If so, the permit is issued.
- **Uses Requiring a Use Permit.** The procedures for obtaining a use permit include an application, which can be filed with the Department of Planning and Community Development and accompanied by plans and information relevant to the standards outlining the requirements of that use. Environmental review is required and public hearings are held for uses requiring a use permit and depending on the intensity of use can be heard before either the Planning Commission or the Board of Supervisors. Such a project can either raise major land use policy issues or create problems for adjoining properties and the surrounding area if it is not considered compatible either by location or design. The purpose of a use permit is to allow Planning Department staff

and the Stanislaus County Planning Commission an opportunity to evaluate a proposed use to determine if problems may occur, to provide the public an opportunity to review the proposed project and express their concerns in a public hearing, and to prevent potential problems that may be caused by the project through the application of conditions of approval.

Table 4-4 identifies housing types permitted by zone under the Stanislaus County Zoning Ordinance.

Table 4-4 Housing Types Permitted by Zone

Housing Type	R-1	R-2	R-3	R-A	A-2	HS	C-1	C-2	M	H-1	SCP- R-1-ST	SCP- R-2 ⁵	SCP- R-3 ⁵
Accessory Dwelling Unit	P	P	P	P	P								
Emergency shelters								p ⁶	p ⁶	p ⁶			
Employee Housing					UP								
Mobile Homes ⁴	P	P	P	P	P		P	P	P	P			
Multiple- Dwelling (see “Group Dwelling” definition in Stanislaus zoning code)		UP	P				P						P
Residential Care Home ⁹			P	UP			P						
Rooming House			P				P			UP			
Single-Family Dwellings	P	P	P	P	P	p ¹	p ²	p ²	p ²	p ²	P	P	P
Apartment House			P				P			UP			
Supportive and Transitional Housing ⁷	P	P	P	P	P	P	P	P	P	P	P	P	P
Two Dwelling Units (Duplex)	p ³	P	P	p ³		UP ⁸	P			UP	P	P	P

Legend

P= Permitted

UP=Use Permit

¹ One single-family dwelling, additions to already existing buildings requiring a building permit,

² Single-family dwelling or one apartment if it is accessory to a permitted commercial or industrial.

³ Duplexes on corner lots of subdivisions created after January 1, 1979 are allowed, provided that each unit fronts on a separate street and each unit has the appearance of a single family home, in the opinion of the director of planning.

⁴ Mobile Homes in lieu of Single-Family residence as regulated by 21.72.

⁵ SCP districts require a development plan and environmental review.

⁶ A use permit is required if the project exceeds 10 beds.

⁷ Supportive and transitional housing is included in the definition of a dwelling and is permitted wherever residential dwelling units are permitted.

⁸ Up to 8 units/acre with a Historic Site Permit (use permit).

⁹ Residential care homes are defined as structures with seven or more persons not of the immediate family are provided with food, shelter and care for compensation, but not including hospitals, clinics, or similar institutions devoted primarily to diagnosis and treatment of disease or injury.

Source: Stanislaus County Zoning Ordinance, 2022

Accessory Dwelling Units and Junior Accessory Dwelling Units

Under state law (Government Code Section 65852.2), an accessory dwelling unit (ADU) is a dwelling unit that provides complete independent living facilities for one or more persons. It must be located on the same parcel on which a single-family dwelling or multifamily development is located or will be built and may be attached to or converted from a portion of the primary dwelling unit or separate from the primary structure (detached). An ADU includes permanent provisions for living, sleeping, eating, cooking, and sanitation. ADUs must be permitted ministerially pursuant to state law in all zoning districts that allow residential uses.

A junior ADU (JADU) is a dwelling unit limited to 500 square feet and converted from a portion of a single-family home. A JADU must contain a kitchen, but bathroom facilities may be shared with the primary dwelling unit. Owner occupancy of the primary dwelling unit is required, and no parking may be required for the JADU. JADUs must be ministerially permitted in zoning districts that allow single-family residences. Government Code Section 65852.22 establishes minimum standards for JADUs.

State law governing ADUs and JADUs has changed rapidly during the previous housing element planning period. State law supersedes local ordinances and while some jurisdictions adopt local ordinances making provisions for ADUs and JADUs, rapid changes mean that local ordinances quickly become out of date. The County's existing ADU ordinance was updated in 2021 and can be found in Chapter 21.74 of the Stanislaus County Zoning Ordinance. The County's ordinance is not consistent with recently passed state laws including AB 345 (allowing the separate sale or conveyance of ADUs in limited circumstances). As a result of this inconsistency, the County will update Chapter 21.74 to allow limited separate sale or conveyance of ADUs.

Emergency Shelter

"Emergency shelter" is defined as housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay (Health and Safety Code 50801). Jurisdictions must allow emergency housing (homeless shelters) in at least one zone without discretionary review.

AB 139, which went into effect on January 1, 2020, mandates that emergency shelters may only be subject to standards that apply to residential and commercial development within the same zone, except that a jurisdiction can apply standards regulating the following:

- Maximum number of beds, off-street parking based upon demonstrated need
- Size and location of onsite waiting and intake areas
- Provision of onsite management
- Proximity to other shelters
- Length of stay
- Lighting
- Security during hours when the shelter is open

The Stanislaus County Zoning Code requires emergency shelters to comply with the standards above, as well as obtain a nondiscretionary use permit subject to the following requirements:

- The maximum number of beds shall not exceed ten;
- Outdoor activity and intake areas should be screened from public view and adjacent properties;

- Lighting shall be provided in all parking, pedestrian paths, and entry, and shielded it from adjacent uses;
- Off street parking shall be provided at a rate of one vehicle per employee, plus one additional parking space;
- A minimum of one supervisory level staff member on site during operation hours;
- A security plan approved by the sheriff's department;
- A licensed security guard provided during intake period;
- The maximum length of stay is no longer than six months;
- Hours of operation are publicly visible, and outdoor activity is only permitted during 8:00am and 10:00pm;
- An approved pet care plan (if pets are permitted); and
- Outdoor trash receptacles are provided and properly maintained.

The County permits emergency shelters by right in the General Commercial District (C-2), the Highway Frontage District (H-1), and the Industrial (M) District for a maximum of ten beds per zone when the site is served by both public sewer and water services and is in an area served by public transit for at least six days a week. The development of a new emergency shelter in a single zone after the 10-bed limit has been reached requires a Use Permit. Emergency shelters are not permitted in other zoning districts, unless rezoned according to a Planned Development District.

Passed in 2022, AB 2339 requires identified zoning designations where emergency shelters are allowed to include sites that meet at least one of the following:

- Vacant and zoned for residential
- Vacant and zoned for nonresidential use and located near amenities and services for homeless individuals
- Nonvacant and suitable for use as a shelter in the current planning period.

Additionally, AB 2339 requires that identified sites must have a minimum area of 200 square feet per person to show adequate capacity for the number of people experiencing homelessness.

The 2022 Stanislaus County Homeless Point-In-Time Count identified 1,857 homeless individuals in Stanislaus County, 911 of which were sheltered at the time of the count.¹ Of these individuals, 1,781 were identified in the incorporated cities of Modesto and Turlock. The Point-In-Time Count included the unincorporated communities of Empire, Keyes, Crows Landing, and Westley in which only 76 homeless individuals (sheltered and unsheltered) were identified. Pursuant to AB 2339, 15,200 square feet (0.35 acres) of land is required to shelter 76 people at a rate of 200 square feet per person. The County must identify 15,200 square feet of land in the C-2, H-1, or M districts located near services and amenities serving homeless individuals.

There are approximately 310 acres of vacant land across 115 parcels in the C-2, H-1, or M districts which allow emergency shelters. Of these sites, nine parcels in the communities of Denair, Salida, and Empire encompassing approximately three acres are within walking distance of amenities and services including groceries, social services, medical services, and transit. With a limit of 10 beds per shelter, a minimum of eight emergency shelters would be needed to accommodate the unsheltered residents in the unincorporated areas of the county.

¹ 2022 Stanislaus County Homeless Point in Time Count, <https://www.stancounty.com/newsfeed/pdf/20220613-resch-pit.pdf>

The current ten bed per shelter and ten bed per zone limits are a constraint to the development of adequate shelter capacity. As described in Program 4-3e, the County will update the zoning code to remove the ten bed per zone limit and increase the size limit for emergency shelters to at least 20 beds per facility.

Farmworker/Employee Housing

The Employee Housing Act, specifically Health and Safety Codes Sections Code Sections 17021.5 and 17021.6, requires employee housing for six or fewer employees to be allowed wherever single-family homes are allowed. Health and Safety Code Section 17021.6 precludes a local government from requiring a conditional use permit, zoning variance, and/or other zoning clearance for employee housing consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single family or household in an agricultural zoning district.

The County defines “farm labor camp” as any living quarters, dwelling, boardinghouse, tent, bunkhouse, camper, mobile home, or other housing accommodation, maintained by an employer for five or more employees in connection with any agricultural work or place where agricultural work is being performed.

The County Department of Environmental Resources is responsible for permitting, inspection, and re-inspections of all employee housing, labor camps, dairy farm labor camps, and labor supply camps, pursuant to Health and Safety Code, Division 13, Part 1, also known as the Employee Housing Act, and California Code of Regulations, Title 25, Division 1, Chapter 1, Subchapter 3, also known as the Employee Housing Regulations.

The County’s Zoning Ordinance requires a use permit for employee housing in the A-2 zoning district. However, the County permits employee housing consistent with State law through a staff level permit when the employees are living and working on lands farmed by the property owner in the agricultural zoning district. Additionally, the County offers a Temporary Mobile Home permit, a ministerial permit which can be used to apply for farmworker housing. Although the Zoning Ordinance is not consistent with state law, the County adheres to the Employee Housing Act in review of proposals for employee housing. On-site farmworker housing is allowed in compliance with State law with Staff Approval. Off-site farmworker housing, where residents do not work at the location of the housing, is allowed with a use permit. For clarity the County will update its ordinance consistent with the Employee Housing Act through Program 4-2c.

Manufactured Housing and Mobile Homes

“Mobile home” is defined as a structure that meets the definition of a manufactured home as defined by Section 18007 the California Health and Safety Code—a structure, which is transportable in one or more sections, is eight feet or more in body width, or 40 feet or more in body length, in the traveling mode, or, when erected onsite, is 320 or more square feet. Mobile homes are defined as being constructed prior to June 15, 1976, while a manufactured home is constructed on or after the same date. Manufactured housing and mobile homes can be an affordable housing option for low- and moderate-income households. Mobile homes and manufactured housing are regulated by Section 21.72 of the Stanislaus County Zoning Ordinance and are permitted in lieu of a single-family dwelling and by right in eight residential and commercial zoning districts except in the Historical Site District. Mobile homes must also conform to all residential use development standards for single family uses applicable within the zoning district which is consistent with Government Code Section 65852.3. The Stanislaus County Building Permit Division is responsible for issuing building permits for installation of manufactured homes on permanent and non-permanent foundation. The Building Permit Division

follows HCD's guidelines and Health and Safety Code Section 1855(a) regulations and requirements for all manufactured home permits except for the Historical Sites District.

Multiple Dwelling

"Multiple dwelling" is defined as a building or portion thereof used and designed as a residence for three or more families living independently from each other and doing their own cooking in the building. Multiple dwellings are permitted by right in the Multiple-Family Residential District (R-3), the Neighborhood Commercial District (C-1) and the Salida Community Plan R-3 district (SCP-R-3) when appropriate infrastructure is available. Dwelling groups, which includes multiple dwellings, require a Use Permit in the Highway Frontage (H-1) and Medium-Density Residential (R-2) Districts. Zoning Ordinance terminology is inconsistent when referencing this land use type. The County plans to modify the Zoning Ordinance to reference multifamily dwellings and define different types of dwellings that may fall into this category. In addition, the Zoning Ordinance will clearly define objective development and design standards that are required to permit these uses. (Program 3-7f).

Dwelling Group

A "Dwelling group" is defined as a group of two or more detached or semidetached single-family, two-family, or multiple dwellings occupying a parcel of land under single ownership.

Stanislaus County interprets the term "dwelling group" as interchangeable with multiple dwelling and allows uses such as townhomes, multi-plexes, and small apartments as allowable land uses. Similar to the definition of "multiple dwelling," discussed above, the language used in the Zoning Ordinance to describe "dwelling group" may not be consistent with generally used terminology, and the definitions may not make it clear to readers and developers where the uses are allowed, particularly because they are allowed without discretionary action. Program 3-6f is proposed to create clarity and ease of interpretation in the County's Zoning Ordinance.

Residential Care Facilities

The California Community Care Facilities Act (Health and Safety Code Section 1500) defines a residential care facility as "any facility, place, or building that is maintained and operated to provide nonmedical residential care, day treatment, adult daycare, or foster family agency services for children, adults, or children and adults, including, but not limited to, the physically handicapped, mentally impaired, incompetent persons, and abused or neglected children." Residential care facilities serving six or fewer persons (small residential care facilities) are considered a residential use of property, subject to the same development standards as other residential uses on that lot (Health and Safety Code Section 1566.3).

Stanislaus County defines a residential care home as a dwelling, building or structure in which seven or more persons not of the immediate family are provided with food, shelter and care for compensation, but not including hospitals, clinics or similar institutions devoted primarily to diagnosis and treatment of disease or injury. Residential care homes for seven or more people are permitted by right in the R-3 and C-1 zoning districts and require a use permit in the R-A zoning District. Residential care homes for six or fewer residents are not defined or specifically listed as a permitted use, but are considered a residential use per Health and Safety Code 1566.3 and are permitted as single-family residences.

Rooming House

“Rooming house” is defined as a building or structure (other than a residential care home) occupied by five or more persons who have agreed to pay a specific rent for services and a specific space as distinguished from guests subject to innkeepers’ liability. Rooming houses are only permitted by right in the R-3 district and require a Use Permit in the H-1 district. Rooming houses are considered a permitted residential use, subject to density limitations, as established in each zoning district if no services are being provided in exchange for money other than a room.

Single-Family Dwelling

“Single-family dwelling” is defined as a detached building designed for and occupied exclusively by one family. Single-family dwellings are permitted in every zone by right with the exception in the non-residential zones which permit them only if they are accessory to a permitted commercial or industrial building. Single-family dwellings permitted in multiple family zones such as the R-3 zone can be considered a constraint to multiple family developments because it results in the overwhelming development of single-family homes in land designated multiple family that should be reserved for other types of housing. As a result, the County will implement Program 3.1e to evaluate and update the Zoning Ordinance.

Single Room Occupancy

Under Housing Element law, cities and counties must facilitate Single Room Occupancy (SRO) as a form of housing for special needs populations (Government Code Section 65583(c)(1)). An SRO unit is usually small, between 200 to 350 square feet. SROs are an important source of affordable private housing for lower-income individuals, seniors, persons with disabilities, and formerly homeless people. SROs are not specifically defined in the County’s Zoning Code nor are they included as a permitted use under any of the zoning districts. The omission of SRO units as a permitted land use in any of the zoning districts can pose a constraint to building this affordable housing type, as developers may be discouraged from developing them. As a result, Program 3-6g is proposed to accommodate the development of SRO units throughout the County.

Supportive and Transitional Housing

State Housing Element law defines transitional housing as “buildings configured as rental housing developments but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance” (Government Code Section 65582(j)).

Transitional housing is a type of housing used to facilitate the movement of homeless individuals and families to permanent housing. Residents of transitional housing are usually connected to supportive services designed to assist the homeless in achieving greater economic independence and a permanent, stable living situation. Transitional housing can take several forms, including group quarters with beds, single-family homes, and multifamily apartments; and typically offers case management and support services to help return people to independent living. The Zoning Code specifies occupancy of no less than six months.

Supportive housing has no limit on length of stay, as set forth in Government Code Sections 65582 and 65650, occupied by low-income individuals who will receive, as part of their residency, supportive services designed to assist the individual in retaining housing, improving health, or enhancing other

life functions. The target population includes homeless families, homeless youth, and persons with disabilities. Similar to transitional housing, supportive housing can take several forms, including group quarters with beds, single-family homes, and multifamily apartments.

The County’s zoning code defines “Supportive Housing” as housing with no limit on length of stay that is occupied by the target population, as defined in California Government Code Section 65582(g), and that is linked to on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. It defines “Transitional Housing” as buildings configured as rental housing developments but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months from the beginning of assistance.

Stanislaus County definition of dwelling unit includes transitional and supportive housing. Therefore, the County permits transitional and supportive housing in all residential zoning districts, wherever residential units are allowed. As a result, there are no constraints to the development of transitional housing.

Two-Family Dwelling (Duplex)

“Two-family dwelling (duplex)” is defined as a detached building designed for and occupied exclusively by two families living independently of each other. Two-family dwellings or duplexes are permitted by right in eight zoning districts and require a use permit in the Highway Frontage District (H-1).

4.1.4 Development Standards

Table 4-5 summarizes residential development standards in the County’s Zoning Ordinance. The County’s residential requirements establish various development standards such as minimum setbacks, maximum lot coverage, maximum height, and minimum site area. Other development standards such as parking are discussed further below in Section 2.1.5. Additionally, the County offers density bonuses, incentives, and concessions to qualifying developments which is also further described below.

Table 4-5 Setback, Lot Coverage, and Height Requirements in Residential Zone Districts

Zone District	Minimum Front Setback	Minimum Side Setback	Minimum Rear Setback	Maximum Lot Coverage	Maximum Height	Minimum Site Area ¹
Agricultural						
A-2	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	n/a	n/a	3, 5, 10, 20, 40, or 160 acres
Residential						
R-A	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	40%	35 ft.	3 acres (Estate Residential) 8,000 square feet (Low Density Residential)
R-1	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	40%	Dwellings: 35 ft. Detached accessory building: 20 ft.	5,000 square feet- serviced by public facilities 20,000 square feet (public water and septic tank) 1 acre (private well and septic tank)
R-2	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	50%	Dwellings: 35 ft. Detached accessory building: 20 ft.	6,000 square feet- serviced by public facilities 20,000 square feet (public water and septic tank) 1 acre (private well and septic tank)
R-3	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	60%	Dwellings: 35 ft. Detached accessory building: 15 ft.	6,000 square feet (serviced by public facilities) 20,000 square feet (public water and septic tank) 1 acre (private well and septic tank)
SCP-R-1	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft. if lot is 5,000-6,999 sq. ft., 6 ft. if lot is greater than 7,000 sq. ft.	12 ft. if lot is 5,000-6,999 sq. ft., 15 ft. if lot is greater than 7,000 sq. ft.	Varies	40 ft. (2.5 stories max)	5,000 square feet
SCP-R-2	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	4 ft.	10 ft. for small lot single family and duets, 4 ft. for private street, 14 ft. for alley easement	Varies	40 ft. (2.5 stories max)	6,000 square feet

Zone District	Minimum Front Setback	Minimum Side Setback	Minimum Rear Setback	Maximum Lot Coverage	Maximum Height	Minimum Site Area ¹
SCP-R-3	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	n/a	10 ft.	Varies	40 ft. (3 stories max)	7,000 square feet
Other						
H-S	n/a	n/a	n/a	n/a	n/a	5 acres; or 1 acre for any sites bordered to the south by the Stanislaus River, two hundred fifty feet west of Sonora Road (to the west), two hundred fifty feet north of Valentine Street (to the north), and two hundred fifty feet east of Lynde Street (to the east)
H-1	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	n/a	35 ft	6,000 (public sewer and water) 20,000 square feet (public water and septic tank) 1 acre (private well and septic tank)
M	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	Varies per Building Code Use occupancy type	Varies per Building Code Use occupancy type	75%	75 ft	n/a
S-P	Varies per Specific Plan	n/a	n/a	n/a	n/a	Varies per Specific Plan
PD	Varies per development plan	n/a	n/a	n/a	n/a	Varies per development plan
Commercial						
C-1	25-70 ft.	5 ft.	5 ft.	n/a	35 ft.	6,000 square feet (public sewer and water) 20,000 square feet (public water and septic tank) 1 acre (private well and septic tank)
C-2	45-70 ft.	None	None	n/a	75 ft.	Set forth in the appropriate R district

ft. = feet

¹ Minimum lot area applies when serviced by two public facilities (exception is R-A Estate Residential). Where serviced by public water and septic tank facilities or private well and public sewer facilities minimum lot area is 20,000 square feet. Where services by private well and septic facilities minimum lot area is one acre.

Source: Stanislaus County Zoning Ordinance, 2022

Overall, Stanislaus County has comparable development standards to other jurisdictions such as San Joaquin County. Both jurisdictions have a minimum five-foot side yard setbacks for their residential zoning districts and a maximum building height of 35 feet for dwellings. Both jurisdictions also have lot coverages that range from 40 to 60 percent for their low- to high-density residential zoning districts. Stakeholder interviews with representatives of the development community indicated that they did not find development standards to be a constraint to housing development. Rather, land availability with adequate zoning (i.e., for multifamily housing) was identified as a constraint.²

Parking Standards

According to the Terner Center for Housing Innovation at UC Berkeley, parking cost can range between \$25,000 to \$75,000 per space to construct.³ Parking provided in underground or structured parking facilities, or if required to be covered or enclosed, can significantly increase the cost of housing and could affect the feasibility of various housing projects in the County. Requirements for parking space locations and maximum distances from dwelling units may also increase the cost of housing and affect the feasibility of housing projects. Requiring less parking not only reduces the project budget but can allow for more space to build additional housing units. Parking requirements for residential uses and Zoning Districts in the County are summarized in Table 4-6.

Stanislaus County has similar parking requirements as surrounding jurisdictions that have a similar geography. For example, San Joaquin County and Merced County require two parking spaces per dwelling unit for single-family homes and 1.5 parking spaces for multiple-family homes. As shown in Table 4-6 below, these same standards apply in Stanislaus County.

Currently, reductions in parking requirements are only offered through State Density Bonus incentives and concessions, or through Planned Development District zoning. Recent state laws have also limited the ability for jurisdictions to impose minimum parking requirements. For example, Housing Element Law (Government Code Section 65585) prohibits a public agency from imposing minimum parking requirements for any residential developments within half a mile from public transit with frequencies intervals of no longer than 15 minutes. The Stanislaus Regional Transit Authority (StanRTA) has about 26 bus routes that run throughout the county (not including commuter bus routes). The majority of the bus routes operate in the incorporated cities, but there are several that run through unincorporated communities, such as Keyes, Denair, Salida, Empire, Crows Landing and Westley. Potential affordable housing developments in unincorporated communities that are near major incorporated cities like Modesto would most likely benefit from state law as some of the bus lines that operate in these areas would qualify under state law for a reduction in minimum parking requirements. Unincorporated communities that are further from incorporated cities have fewer bus routes that run frequently, and would thus not qualify for parking reductions allowed by state law. Although parking standards are similar to other surrounding jurisdictions and are generally not seen as a constraint, the County may offer opportunities for reduced parking for affordable housing units to bring down the costs of construction. As the County contemplates updates to its zoning code, such as the introduction of objective design or development standards for multifamily housing, it should consider this incentive in the future. As noted in Section 2.1.4 above, the County will implement Program 3-7f to adopt objective standards for multifamily housing, including requirements for parking, and identify objective standards to support streamlined housing approval.

² A complete summary of the findings gathered during stakeholder interviews can be found in Appendix A.

³ Terner Center for Housing Innovation at UC Berkeley, 2016. Available at: <http://ternercenter2.berkeley.edu/proforma/>

Table 4-6 Parking Requirements by Residential Use Type

Use	Stanislaus County Required Off-Street Parking Spaces	County of San Joaquin Required Off-Street Parking Spaces	County of Merced Required Off-Street Parking Spaces	City of Modesto
Single family	2 spaces/dwelling 1 space/ADU	2 spaces/dwelling	2 spaces/dwelling (4 bed) 3 spaces/dwelling (5 bed)	2 spaces/unit
Two-Family	1.5 spaces/unit	2 spaces/dwelling	2 spaces/dwelling (4 bed) 3 spaces/dwelling (5 bed)	3 spaces per unit
Multiple Family	1.5 spaces/unit	1.5 spaces/dwelling unit	1½ spaces/ per 1 bedroom 2 spaces (2-4 bedrooms) 3 spaces (5+ beds) Plus 1 guest space for every 5 units	1 space/unit (0+ bed) 2 spaces per unit (2+ beds)
Roominghouse	1 space/room + 1 space	N/A	1 space/unit	1 space per two beds
Mobile Home Parks	2 spaces/mobile home space + 1 recreational vehicle space for every 5 mobile homes	1.5 spaces/dwelling unit	2 spaces/unit plus 1 guest space for every 5 units	As specified per PD zone approval

Source: Stanislaus County Zoning Ordinance. 2022. https://library.qcode.us/lib/stanislaus_county_ca/pub/county_code/item/title_21-chapter_21_76?view=all

County of San Joaquin Zoning Ordinance. 2022.

https://library.municode.com/ca/san_joaquin_county/codes/development_title?nodeId=TIT9DETI_DIV10DERE_CH9-1015PALO_9-1015.3REPASP

County of Merced Municipal Code. 2023. https://library.qcode.us/lib/merced_county_ca/pub/county_code/item/title_18-article_3-chapter_18_38?view=all

City of Modesto Municipal Code. 2023. https://library.qcode.us/lib/merced_county_ca/pub/county_code/item/title_18-article_3-chapter_18_38?view=all

4.1.5 Processing and Permit Procedures

The processing time needed to obtain development permits and required approvals is commonly cited by developers as a prime contributor to the high cost of housing. Processing times depend on the magnitude and complexity of the proposed development project.

The time between application submittal and project approval varies depending on the magnitude and complexity of the development proposal. Factors that can affect the length of development review on a proposed project include a requirement to hold a public hearing, the level of environmental review required, and the completeness of the application submittal. The Permit Streamlining Act governs the processing time for planning applications, although the applicant can waive these time limits. The length of processing time also depends upon the knowledge and expertise of the applicant’s development team and their ability to prepare plans in accordance with the jurisdiction’s requirements, make timely submissions (and resubmissions), and revise plans based on feedback received.

In Stanislaus County, a General Plan Amendment may take six to nine months to process while a Site Plan review may take three weeks to process. Table 4-7 provides a summary of the processing times and approval body required for various types of planning permits and actions.

Table 4-7 Application Processing Time

Action	Processing Time	Approval Body
General Plan Amendment	6-9 months	Stanislaus County Board of Supervisors
Zone Change	4-6 months	Stanislaus County Board of Supervisors
Subdivision and Parcel Map	3-4 months	Stanislaus County Planning Commission or Board of Supervisors
Use Permit	3-4 months	Stanislaus County Planning Commission or Board of Supervisors
Site Plan Review	Ministerial building permit review which takes 3 weeks	Reviewing agencies of Planning, Building, DER, PW, and Fire

Source: Stanislaus County Planning Forms, 2022

<https://www.stancounty.com/planning/forms/PLAN-application-questionnaire.pdf>

If permitted by the zoning district, residential uses such as single-family homes, ADUs, multifamily developments, and manufactured homes that meet applicable requirements may be permitted through a ministerial review. If the zoning district requires a use permit, then the development must be reviewed and approved by the Planning Commission through a public hearing. The Planning Commission reviews the project based on applicable zoning requirements, density, and the ability to provide adequate wastewater and water service. The processing times in Stanislaus County is comparable to other neighboring jurisdictions such as the County of San Joaquin where a discretionary permit also takes about three months. However, Stanislaus County does not have a design review requirement like many other jurisdictions, except for H-S districts. Stanislaus County permit types are further described below:

In addition to permitting timeframe, parcels located within a City's Sphere of Influence (SOI) are subject to City approval (with the exception of agricultural uses and religious institutions). A significant amount of county territory is within a City's SOI. If a City does not approve a project that is located within the SOI, it cannot move forward. As a result, this approval process represents a development constraint.

General Plan Amendment

A General Plan Amendment requires a discretionary approval by the Stanislaus County Board of Supervisors, which considers a recommendation from the Stanislaus County Planning Commission, and requires CEQA review. A General Plan Amendment is reviewed by the Planning Department to ensure the proposed division of land meets local and state requirements. Per state law, General Plan Amendments can only be considered by the Board of Supervisors no more than four times per year, which limits public hearing scheduling and may add time to the review process. Additionally, Senate Bill 18 requires a 90-day tribal review period, which adds time to the review process. When reviewing a General Plan Amendment, the County considers the levels of public and private services that may be affected. Findings include the following⁴:

- The General Plan Amendment will maintain a logical land use pattern without detriment to existing and planned land uses.
- The County and other affected government agencies will be able to maintain levels of service consistent with the ability of the government agencies to provide a reasonable level of service.

⁴ Stanislaus County Department of Planning and Community Development, Application Form. [stancounty.com/planning/forms/PLAN-application-questionnaire.pdf](https://www.stancounty.com/planning/forms/PLAN-application-questionnaire.pdf)

- The amendment is consistent with the goals and policies.

Once the County has reviewed the project and prepared an environmental assessment, if applicable, the amendment is recommended for review by the Planning Commission through a public hearing. The Planning Commission then votes to recommend approval or denial of the project to the Board of Supervisors. The Board of Supervisors then considers the Planning Commission's recommendation during a subsequent public hearing and adopts a determination of approval or denial of the project.

Zone Change (Rezone)

A Zone Change requires discretionary approval by the Stanislaus County Board of Supervisors, which considers a recommendation from the Stanislaus County Planning Commission, and requires CEQA review. A rezone application is reviewed by the Planning Department to ensure the proposed division of land meets local and state requirements. Once the County has reviewed the project and prepared an environmental assessment, if applicable, the project is recommended for review by the Planning Commission through a public hearing. The Planning Commission then votes to recommend approval or denial of the rezoning to the Board of Supervisors. The Board of Supervisors then considers the Planning Commission's recommendation during a subsequent public hearing and adopts a determination of approval or denial of the project. A zone change must be found to be consistent with the General Plan, and if the subject parcel is zoned for agriculture, the following Agricultural Conversion Findings in Policy 2.7 of the General Plan Agricultural Element must be made:

- A. Overall, the proposal is consistent with the goals and policies of the General Plan.
- B. There is evidence on the record to show a demonstrated need for the proposed project based on population projections, past growth rates and other pertinent data.
- C. No feasible alternative site exists in areas already designated for the proposed uses.
- D. Approval of the proposal will not constitute a part of, or encourage, piecemeal conversion of a larger agricultural area to non-agricultural uses, and will not be growth-inducing (as used in the California Environmental Quality Act).
- E. The proposed project is designed to minimize conflict and will not interfere with agricultural operations on surrounding agricultural lands or adversely affect agricultural water supplies.
- F. Adequate and necessary public services and facilities are available or will be made available as a result of the development.
- G. The design of the proposed project has incorporated all reasonable measures, as determined during the CEQA review process, to mitigate impacts to agricultural lands, fish and wildlife resources, air quality, water quality and quantity, or other natural resources.

A zone change requires a plot plan, development schedule, elevations, sign plan, parking analysis, landscaping and tree plan, and a records search for historical and cultural resources. The Planning Commission may impose conditions of approval in connection with the rezoning. The Board of Supervisors then considers the proposal in a public hearing and votes to approve or deny the project.

Subdivision and Parcel Map

A subdivision or parcel map application is submitted when a division of land is required for a development. All subdivision applications must comply with the County Subdivision Ordinance and the state Subdivision Map Act. A subdivision application is submitted to the Planning and Community Development Department and is reviewed by the Planning Department and the Public Works

Department to ensure the proposed division of land meets local and state requirements. The application is then referred to the Planning Commission for approval. A Parcel Map or Tentative Map shall not be approved by the Planning Commission if any of the following findings⁵ are made:

- The proposed map is not consistent with applicable general and specific plans;
- The design or improvements of the proposed subdivision is not consistent with applicable general and specific plans;
- The site is not physically suitable for the proposed density of development;
- The site is not physically suitable for the type of development;
- The design of the subdivision, or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
- The design of the subdivision, or the type of improvements are likely to cause serious public health problems;
- The design of the subdivision or the type of improvements will conflict with easements acquired by the public at large, for access through, or use of, property within the proposed subdivision.

The Planning Commission may impose conditions of approval in connection with the subdivision.

Use Permit

A use permit is required to ensure that the establishment, maintenance, and operation of the proposed use or building is compatible with surrounding land uses and will not be detrimental to the health and safety persons residing or working in the neighborhood, or to the property and improvements in the neighborhood, or the general welfare of the County. The use permit application is submitted to the Planning and Community Development Department and is reviewed for consistency with the County Zoning Ordinance and General Plan. The application is also routed to other departments and applicable agencies that result in comments pertaining to consistency with fire, water, airport, and other agency standards. Once the County has reviewed the project and prepared an environmental assessment, if applicable, the project is recommended for review by the Planning Commission through a public hearing. The Planning Commission then votes to approve or deny the project. The Planning Commission must find that:

- The establishment, maintenance and operation of the proposed use or building applied for is consistent with the general plan and will not, under the circumstances of the particular case, be detrimental to the health, safety and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the county.

The Planning Commission may impose conditions of approval in connection with the Use Permit.

Site Plan Review

A Site Plan Review is a ministerial review required for new construction upgrades, and/or remodeling that requires a building permit. The site plan must provide all required information to show compliance with the Zoning Ordinance, Fire Code, and Building Code requirements. Stanislaus County

⁵ Stanislaus County Department of Planning and Community Development, Application Form. stancounty.com/planning/forms/PLAN-application-questionnaire.pdf

does not have a Site Plan Review Committee and review site plans for compliance at a staff level as part of the regular land use entitlement or building permit application process.

On- and Off-Site Improvements

In accordance with the Stanislaus County Code and adopted Plans and Specifications, all new development shall install various on- and off-site improvements to ensure the health and safety of residents and to ensure development is connected to the state, County, and local utilities, roads and other infrastructure. As conditions of approval, Stanislaus County requires developers to construct various on- and off-site improvements related to roadways, utilities, and stormwater control as described below. These improvements are prescribed in accordance with County standards and include the following:

- The construction of curbs, gutters, sidewalks, street lighting, and street paving to meet the existing street pavement;
- The dedication of land, payment of an in-lieu fee, or a combination of both for park and recreational purposes; and
- The construction of water, sewer, storm drainage, and utility systems.

Typically, on- and off-site improvement costs associated with residential projects are passed on to the homebuyer as part of the final cost of a home. Although these improvements understandably add to the cost of a project, they are considered necessary to meet basic public health and safety standards. The site improvement requirements imposed by the County are no greater than conditions implemented throughout the incorporated cities and surrounding counties.

4.1.6 Fees

Planning/Processing Fees

All housing projects are subject to a variety of fees and exactions to process permits and provide necessary services and facilities allowed by state law. These costs can be a constraint to the maintenance, improvement, and development of housing because the additional costs borne by developers contribute to overall increased housing unit cost. However, fees are necessary to maintain adequate staffing services and other public services and facilities provided by the local jurisdiction.

Development review fees are necessary to fund staff review of development applications for consistency with adopted plans, ordinances, standards and specifications, and applicable environmental laws. All planning, building and engineering-related development review fees are in adopted fee schedules for each respective department, or are included as a condition of approval or development standards for a project and are reviewed regularly.⁶

The first step in the development review process is obtaining an “entitlement” and related environmental review. For planning entitlements, applicants provide a flat fee or an initial deposit depending on the entitlement type, which is then charged on a time and material basis. Stanislaus County primarily uses in-house staff for environmental review; not including the preparation of technical environmental studies (e.g., traffic and noise studies) or environmental impact reports. A typical Initial Study, with related environmental studies is covered in the initial deposit or flat rate application fee. Additional studies (transportation, air quality, noise, health risk assessment, among

⁶ Stanislaus County. Adopted Planning Services Fee Schedule – July 23, 2022. Available: <https://www.stancounty.com/planning/documents/planning-fees.pdf>

others) may be required on case-by-case basis. The cost for projects requiring an Environmental Impact Report range drastically depending on the scale and complexity of the project. The Planning Division does not add an administrative or other charge to CEQA consultant fees, but does charge the actual cost for staff time in reviewing the documents and may charge for the cost of a county contracted third party review.

Following entitlement approvals and environmental certification, applicants submit improvement plans and grading permits and utility plans. The County will also accept concurrent building permit applications that consist of detailed construction-level plans.

Development review adds to the cost of a development and contributes to overall increased housing unit cost. However, these fees are necessary to provide for the timely and thorough review of development applications and to maintain adequate planning services. Development and Planning fees are shown in Table 4-8 below.

Table 4-8 Stanislaus County Planning and Processing Fees

Entitlement Type	Fee
Planning Fees	
Use Permit (non-agricultural zones)	\$5,549
General Plan Amendment	Actual Cost/Deposit \$6,837
Specific Plan	Actual Cost/Deposit \$21,990
Zoning Ordinance Variance	Actual Cost/Deposit \$4,913
Zoning Ordinance Text Amendment	Actual Cost/Deposit \$7,152
Lot Line Adjustment	\$1,027
Environmental Review	
Categorical Exemption	Environmental document filing fees will be waived if a project will have no effect on fish and wildlife or if the project is statutorily or categorically exempt from CEQA.
County Clerk Processing Fee	\$57
Negative Declaration	\$2,764
Environmental Impact Report	Deposit - To be determined based on cost estimate
Fish and Wildlife Fee - Negative Declaration*	\$2,764
Fish and Wildlife Fee - Environmental Impact Report*	\$3,839
Land Division	
Tentative Subdivision Map	Actual Cost/Deposit \$8,954 plus \$30 per lot
Parcel Map	Parcel Maps (R, C, M, LI, IBP, PD, PI Zones)- \$4,823 plus \$30 per lot Parcel Maps (A-2 Zone, Non-Williamson Act And < 4 Parcels + Remainder) -\$5,435 plus \$30 per lot Parcel Maps (A-2 Zone, With Williamson Act Or > 4 Parcels + Remainder) - \$5,449 plus \$30 per lot, or \$1,000 deposit for ministerial review of SB9 parcel maps

*Fees set by the State of California.

Source: Stanislaus County Planning Services Fee Schedule – July 23, 2022.
<https://www.stancounty.com/planning/documents/planning-fees.pdf>

Impact Fees

Impact fees are required to offset the cost of provision of public services and include, but are not limited to, sewer and water connection fees, and park, fire, traffic, and school impact fees. Impact fees are assessed after a project entitlement is completed, and when building permit applications are submitted. Impact fees are required to offset the cost of provision of public services and include sewer and water connection fees as well as park, traffic, various district, and school impact fees. Below is a general description of these fee types along with a summary of the fees assessed in the unincorporated area of Stanislaus County, shown in Table 4-9 and Table 4-10.

Sewer and Water Fees

When available, developers must pay for new or upgraded sewer and water connection fees and for any improvements required to bring services to the development sites to ensure that new development is safely connected to the service provider's systems by expanding the sewer and water infrastructure to the new development. Fees are generally assessed on each new residential development according to unit counts and number of connections, and are set by the service provider. Per State Law, allowances in design (i.e., master water meter rather than individual water meters) that lead to fee reductions are permitted for affordable housing and for ADUs within existing homes and those under 750 square feet in size.

Public Facilities Fees

The Stanislaus County Public Facilities Fees (PFF) Program was developed in 1989. The primary objective of the PFF program is to ensure that new development pays the capital costs associated with growth. The PFF program collects impact fees from new development throughout the County, both in the cities and the unincorporated area, to fund the public facilities required to accommodate growth. The County's Public Facilities Fee can help pay for roads, facilities for criminal justice, health, fire, and various other county buildings. Public Facilities fees can be charged to new development based on density and traffic impact.

State law AB 602 requires a proportionality test to ensure the pro-rata share of costs to provide services and infrastructure by individual developments is reasonable. The nexus fee study must calculate a fee proportional to the square footage of the proposed units, or make specified findings explaining why square footage is not an appropriate metric to calculate the fees. Stanislaus County's PFF program charges residential land uses on a per unit basis, rather than the square footage of the proposed units. As a result, Stanislaus County's PFF structure is inconsistent with AB 602 and may pose a constraint to development of multi-family buildings. The County will implement Program 3-9e to establish a fee schedule that accurately reflects the impact of single-family and multi-family development, pursuant to AB 602.

Traffic Impact Fees

The PFF program includes a Regional Traffic Impact Fee (RTIF)⁷ to help mitigate the cumulative transportation impacts of growth. Improvements funded through the RTIF will fund roadway and intersection improvements, and other enhancements that may support multi-modal transportation. The RTIF is assessed on single family homes, duplexes, multifamily homes, mobile home parks, and ADUs. The adopted fee for single family development is \$3,592 per unit which is consistent with medium-sized retail and shopping center establishments and less than the RTIF for office and drive-

⁷ Stanislaus County, Board of Supervisors, August 11, 2020 Agenda. <https://www.stancounty.com/bos/agenda/2020/20200811/PH02.pdf>

through or gas station uses. For multifamily homes, the fee is \$2,404 per unit which is similar to small retail uses but less than the fee for a single-family home. Further, the County has included traffic impact fees as an environmental mitigation measure for certain projects or community plans, and those are applied on a project-specific basis.

Park Impact Fees

The Department of Parks and Recreation maintains grounds and operations of identified parks and facilities and provides basic levels of services at all general funded neighborhood parks, reservoirs, and regional parks throughout Stanislaus County. The PFF Park facility fee is charged through the building permit issuance process and assessed for both regional and neighborhood parks. Table 2-10 below shows a listing of these fees and are intended to ensure the provision of parks and open space are afforded to the growing population of the County commensurate with permitted development.

In addition to the parks fee included in the PFF, subdivisions subject to the Quimby Act are eligible for in-lieu fees for subdivisions under 52 lots. For subdivisions over 52 lots, parkland dedication is required.

Emergency Services Fees

The PFF Emergency Services Fee is used to fund construction of new buildings, or acquisition of vehicles or equipment to expand the capacity of existing emergency services systems to serve new development.

School and Fire Developer Fees

There are twenty-five school districts and 20 fire districts in Stanislaus County; of which 12 school districts and 10 fire districts charge impact fees for all new development in unincorporated Stanislaus County. The school district fees are provided in Table 4-11 and the fire district fees are provided in Table 4-12. The fees are used for facility improvements and operations and are intended to offset the impact of increased numbers served. Developer Fees, which are assessed by the School and Fire Districts on a per square foot basis, are collected by the respective districts to pay the required fees. There are no reductions for affordable housing projects; however, small projects such as ADUs under 750 square feet may be exempt from school impact fees. Stanislaus County verifies payment of school and fire district fees at the time a building permit is issued, and only verifies payment of fees to high school districts.

Table 4-9 Stanislaus County Development Impact Fees

Residential (Per Dwelling Unit)	Total Fee
Regional Parks/Neighborhood Parks	\$346/\$671
Sewer	Varies. Depends on whether unincorporated areas are part of different jurisdictions
Transportation Single Family	\$3,592 per unit
Transportation Multiple Family	\$2,404 per unit

Source: Stanislaus County Public Facilities Fees. https://www.stancounty.com/planning/bp/ImpactFees/2021_impact_fees.pdf

Table 4-10 Stanislaus County Public Facilities Fee Summary – Unincorporated

Type	Single Family/Duplex	Multifamily/ Mobile Home	Accessory Dwelling Unit
Animal Services	\$118	\$77	\$37
Behavioral Health	\$92	\$60	\$29
Criminal Justice	\$134	\$87	\$42
Detention	\$1,091	\$710	\$343
Emergency Services	\$16	\$10	\$5
Health	\$353	\$230	\$111
Library	\$350	\$228	\$110
Other County Facilities	\$2,121	\$1,381	\$667
Regional Parks	\$346	\$225	\$109
Neighborhood Parks	\$671	\$437	\$211
Sheriff	\$1,078	\$702	\$339
Countywide IT	\$10	\$6	\$3
Recommended RTIF (Regional Transportation Impact Fee)	\$3,592	\$2,404	\$995
Admin Charge	\$199	\$131	\$60
Total Fees	\$10,171	\$6,688	\$3,061

Note: Accessory dwelling units (ADUs) up to 750 square feet are exempt from impact fees. Impact fees for an ADU of 750 square feet or larger are charged fees proportional to the size of the ADU and to the size of the primary dwelling unit. Proportional ADU fees cannot exceed the flat rate listed above.

Source: Stanislaus County Public Facilities Fees. https://www.stancounty.com/planning/bp/ImpactFees/2021_impact_fees.pdf

Table 4-11 Stanislaus County School District Fees

School Districts	Fees
Ceres Unified	No information at this time
Denair Unified	No information at this time
Empire Union	No information at this time
Hughson Unified	\$4.79 per sq-ft
Modesto Union High School	\$4.79 per sq-ft
Newman – Crows Landing Unified	\$4.79 per sq-ft
Oakdale Joint Unified	\$4.79 per sq-ft
Patterson Joint Unified	No information at this time
Riverbank Unified	\$4.79 per sq-ft
Salida School District	\$4.79 per sq-ft
Turlock Joint Unified	\$4.79 per sq-ft
Waterford Unified	\$4.79 per sq-ft

Note: Information is current as of July 2023, as reported by each district and/or previously reported to the Stanislaus County Planning and Community Development. Fees are subject to change by district.

Source: Stanislaus County

Table 4-12 Stanislaus County Fire District Fees

School Districts	Fees
Stanislaus Consolidated Fire	Waterford <ul style="list-style-type: none"> ▪ Not fully fire sprinklered: \$0.29 per sq-ft ▪ Fully fire sprinklered: \$0.22 per sq-ft"
	Riverbank <ul style="list-style-type: none"> ▪ Not fully fire sprinklered: \$0.19 per sq-ft ▪ Fully fire sprinklered: \$0.14 per sq-ft
Oakdale Rural Fire	No fee*
Keyes Fire	\$0.43 per sq-ft
Denair Fire	No information at this time
Hughson Fire	\$0.60 per sq-ft
Mountain View	No information at this time
Salida Fire Protection	\$0.49 per sq-ft
West Stanislaus Fire	\$0.86 per sq-ft
Westport Fire	No information at this time
Woodland Fire	\$0.36 per sq-ft

* Oakdale Rural Fire District charges a fee on a per parcel basis. If a parcel has already paid the fee, subsequent development wouldn't be subject to additional fees. The fee amount was not available as of July 2023.

Source: Stanislaus County

A 2018 User Fee Study compared the planning fees in Stanislaus County to eight comparable counties (Fresno, Kern, Madera, Merced, Monterey, Sacramento, San Joaquin, and Tulare) and three local cities (Modesto, Turlock, and Patterson). The study concluded that Stanislaus County's fees are in line with the other jurisdictions surveyed. As a result of this analysis, on- and off-site improvement and development fees are not found to be a constraint to the development of housing.

4.1.7 Review of Local Ordinances

Density Bonus

State Density Bonus Law (Government Code Section 65915) requires jurisdictions to provide housing developers incentives and concessions to encourage the development of affordable housing and housing for certain targeted groups such as students, seniors, transitional foster youth, and disabled veterans. Recent updates to the state law provide significant reductions in parking requirements for affordable housing projects meeting the requirements of the Density Bonus law. No parking requirements may be imposed for 100 percent affordable housing projects near major transit stops. Other projects containing a percentage of affordable units near transit are subject to no more than one-half space per unit. For all projects meeting the minimum Density Bonus Law standards, no more than 1.5 spaces per two- and three-bedroom units shall be required.

Stanislaus County adopted their current Density Bonus Ordinance in 2015 (Chapter 21.82 Density Bonus for Affordable Housing). The ordinance is not consistent with current State requirements as a result of new changes in the last several years. Until forthcoming updates are complete, the County must default to State Density Bonus Law and will implement Program 2.2a to update the Density Bonus Ordinance to be consistent with state law.

4.1.8 Building Codes and Enforcement

The Building Permits Division provides construction permits, floodplain administration (for construction permits), and administers the County’s abandoned and dangerous building abatement program. Stanislaus County adopted and currently enforces the California Building Code (CBC), 2022 Edition. The CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. The guidelines established by the CBC provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment.

In addition to enforcement of CBC regulations, Stanislaus County implements Measure X, which is a local initiative approved by the voters of Stanislaus County in 1990, and it is enforced by the Department of Environmental Resources (DER) during building permit review. This measure requires that urban development on residential parcels created after July 13, 1990, establishes primary and secondary sewage treatment. Farmworker housing, very low-income housing, and single-family uses on lots recorded prior to July 13, 1990, are permitted to utilize traditional septic tank and leach field systems. However, while the 1990 changes are more restrictive than the CBC, the changes were necessary due to local climatic, geological, or topographical conditions throughout Stanislaus County. These changes are intended to protect the health and well-being of residents in unincorporated areas of the county.

The Building Permits Division also investigates and enforces regulations for substandard buildings. These investigations occur in response to complaints received or during their daily inspections. During the investigations of substandard buildings, the building inspectors provide homeowners with information regarding the County’s housing rehabilitation programs to assist homeowners repair their homes. The California Health and Safety Code Section 17980(b)(2) states that government enforcement agencies, when deciding whether to require vacation or repair of a building, shall give preference to repair a building whenever economically feasible to do so without having to repair more than 75 percent of the dwelling. The Abatement of Dangerous Buildings (ADB) program involves the evaluation of a structure and has building inspectors work with the owners to resolve the issues. A building must be declared a Nuisance by the Stanislaus County Board of Supervisors before the building can be demolished. The Stanislaus County Nuisance Abatement Hearing Board provides recommendations to the Board of Supervisors on requests to declare a nuisance.

Along with the Building inspectors the Department of Environmental Resources—Code Enforcement also investigates complaints received from residents. They investigate complaints related to illegal dumping, nuisances creating health and safety issues, housing, zoning, and vehicle abatement.

4.1.9 Growth Management

Growth management is a tool that local governments use to prevent urban sprawl and preserve open space, natural resources, and agricultural land. Growth management measures, such as urban growth boundaries, can in some instances increase the cost of affordable housing by limiting the amount of land for new development. There is a greenbelt agreement between the cities of Oakdale and Riverbank, the Oakdale-Riverbank Corridor Area Agreement, to protect agricultural lands between the two cities.

In 2007, voters of the County passed Measure E, a 30-year land use restriction initiative that requires that any redesignation or rezoning of land in the unincorporated area from agricultural or open space

use to residential use must be approved by a majority vote of the County voters at a general or special local election. Residential use means any land use designation, zoning district or other legislative entitlement authorizing, allowing, or consistent with residential development at a density greater than one dwelling unit per 10 gross acres.

Measure E applies to any property designated Agriculture in the General Plan Land Use Element or zoned A-2 (General Agriculture). Exemptions exist to allow the rezone of agricultural land to support lower-income housing development under some circumstances. These exemptions allow up to 10 acres of land per year to be redesignated for residential use without a Measure E vote, if the Board finds, based on substantial evidence in the record, and HCD certifies in writing, that all the following circumstances exist:

- The approval is necessary and required to meet the County’s legal fair share housing requirements.
- There is no other land in the County or the cities in the County already designated for urban use that can accommodate the County’s legal fair share housing requirement.
- Additional acreage may be approved without a Measure E vote if it is necessary to meet the County’s legal fair share obligation for moderate, low, or very low-income housing units. This includes multifamily densities which state that all housing units shall be permanently affordable.
- Development projects that obtained a vested right prior to the effective date of the Measure E policy and any development project consisting entirely of farm worker housing.

The Measure E initiative has been incorporated into the County’s General Plan as Goal 7, Policy 32 of the Land Use Element and remains in effect until December 31, 2036.

While there are exemptions from the provisions of Measure E, it may still present some barriers to housing development, specifically, to lands within Community Plan areas and city Spheres of Influence adopted by the Stanislaus Local Agency Formation Commission that have access to infrastructure and are in proximity to services. It has been County policy to periodically review Measure E to see if the ability for the County to meet its housing needs is constrained. This assessment will continue to be required in accordance with Program 3.1f, which will require evaluation of Measure E on a bi-annual basis.

4.1.10 Development, Maintenance, and Improvement of Housing for Persons with Disabilities

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that a paved path of travel can be provided to residents who have mobility impairments.

Reasonable accommodation procedures are codified in the County’s Zoning Ordinance Chapter 21.86. As stated in the Zoning Ordinance, “In order to make housing available to an individual with a disability, any person may request a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability, equal opportunity to housing of their

choice.” Requests for reasonable accommodation are submitted as a ministerial permit subject to the staff approval permit application process. The Planning Director or their appointed designee reviews and approves or denies within thirty days after the application is deemed complete. If the application for a reasonable accommodation involves another discretionary decision the Planning Director reviews and determines the approval of the reasonable accommodation request, and then this decision is then accepted by the reviewing body of the discretionary permit. A decision to approve, approve with modifications, or deny a request for reasonable accommodation must be consistent with federal and state fair housing laws. The Planning Director must approve a request for accommodation if the following findings can be made:

- The housing, which is the subject of the request, will be used by a disabled individual as defined under the Acts;
- The requested reasonable accommodation is necessary to make housing available to an individual with a disability under the Acts;
- The requested reasonable accommodation would not impose an undue financial or administrative burden on the County;
- The requested reasonable accommodation would not require a fundamental alteration in the nature of a County program or law, including but not limited to land use and zoning; and
- There are no reasonable alternatives that would provide an equivalent level of benefit without requiring a modification or exception to the County’s applicable rules, standards, and practices.

The County’s current procedure for reasonable accommodations is consistent with Federal Fair Housing Act and the California Fair Employment and Housing Act and is not a constraint to the development of housing for persons with disabilities.

4.2 Non-Governmental Constraints

A variety of factors impact development and housing costs and can provide barriers to local housing production. Some of these factors include market forces, which local government has little or no control over. State law requires that a Housing Element address and assess these barriers, which could lead to actions or programs to support the production of future housing. The non-governmental constraints evaluated in this section for Stanislaus County include the following categories: cost of land, cost of construction, and availability of financing. Additionally, non-governmental constraints such as environmental and infrastructure constraints are also discussed in this section because Stanislaus County has unique challenges related to sewer and water infrastructure, as well as some distinct challenges related to environmental hazards.

4.2.1 Construction Cost

Construction costs depend on several factors, including the type of construction, custom versus tract development, cost of materials, site conditions, finishing details, amenities, size, and structural configuration. The International Code Council estimates the average price of labor and materials for typical wood-frame housing. Estimates are based on “good-quality” construction, providing for materials and fixtures above the minimum required by state and local building codes.

The International Code Council estimated in 2023 that the national average cost per square foot for good-quality housing was approximately \$156 for multifamily housing, \$178 for single-family homes, and \$196 for residential care/assisted living facilities.⁸

Sources specific to Stanislaus County indicate the construction cost of a home can range between \$150 to \$340 per square foot, or \$300,000 to \$680,000 for a 2,000-square-foot home depending on the quality of construction.⁹ The lower end of this range, typical for multifamily housing, would price a 500-square-foot unit, based on recent examples in Stanislaus County, at \$75,000 to construct. If labor or material costs continue to increase, then increased construction costs have the potential to constrain new housing construction and the rehabilitation of existing housing. While the costs above vary based on higher construction costs in the State of California, construction costs are not specifically identified as a constraint for Stanislaus County.

4.2.2 Land Cost

The housing market and land cost in Stanislaus County can vary depending on location, zoning (allowable density), availability of improvements, and proposed land use of the site. In general, entitled single-family subdivisions with infrastructure command higher prices than raw land. Available improvements can consist of improvements to streets, sidewalks, water and sewer, drainage, curbs and gutters, street signs, park dedications, utility easements, and landscaping. Improvement standards establish infrastructure or site requirements to support new residential development. Land costs and value are difficult to average on a countywide basis as land value is assessed based on the characteristics unique to each property.

The cost of raw, developable land creates a direct impact on the cost for a new home. A higher cost of land raises the price of a new home because developers consider the cost of land while evaluating the feasibility of a development. When land costs are high, developers must ask for higher rent or sales prices to make their development feasible. Residential land prices in Stanislaus County average between \$35,000 to \$75,000 per acre of raw multifamily residential land¹⁰¹¹. Prices for raw single-family residential land can vary greatly between \$50,000 and over \$150,000 per acre. While land costs increase over time, these raw costs are not necessarily a constraint to housing. A comparison to San Joaquin County shows that costs are slightly lower, and still relatively inexpensive when compared to counties in the Bay Area. As a result, raw land costs are not considered a constraint to the development of housing in Stanislaus County.

4.2.3 Availability of Financing

The availability of developer financing options affects the feasibility of housing developments. Financing is available from a variety of sources including financial institutions, insurance companies, and pension plans. Below is a discussion of some of the government assistance programs and private financing opportunities that affect the availability of financing in unincorporated Stanislaus County.

⁸ International Code Council Building Valuation Data. February 2023. Available: https://www.tualatinoregon.gov/sites/default/files/fileattachments/building/page/5057/feb_2023_icc_building_valuation_data_table.pdf. Accessed May 11, 2022

⁹ "Cost to Build a Home in Modesto." Bluehome.com. Accessed September 2022. www.homeblue.com.

¹⁰ Zillow, 2022. https://www.zillow.com/homes/stanislaus-county_rb/ Date Accessed December 12, 2022.

¹¹ LoopNet. 2022. <https://www.loopnet.com/search/commercial-real-estate/stanislaus-county-ca/for-sale/?sk=f8a819bda2a65db93f7ba04b3d889f36> Accessed December 12, 2022.

Affordable Housing Programs

- The Home Investment Partnerships Program (HOME) assists cities, counties, and non-profit community housing development organizations to create and retain affordable housing for lower-income renters or owners. HOME funds are available as loans for housing rehabilitation, new construction, and acquisition and rehabilitation of single and multifamily projects and as grants for tenant-based rental assistance. As lead entity of the City of Turlock/Stanislaus County HOME Consortium, City of Turlock staff assumes overall responsibility for administration of HOME funds and the responsibility for their CDBG funds. Stanislaus County, as the lead entity of the Stanislaus Urban County a HUD-designated entitlement jurisdiction, is a member of the HOME Consortium. The Stanislaus Urban County consisting of the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, and Waterford, and the unincorporated area of the county. Stanislaus County will be taking over administration of HOME funds on July 1, 2023, as the lead entity of the Stanislaus HOME Consortium, which will be comprised of the same jurisdictions as the current HOME consortium.
- Stanislaus County, as the lead entity of the Stanislaus Urban County, assumes overall responsibility for administration of Community Development Block Grant (CDBG) , as well as Emergency Solutions Grant (ESG), HUD entitlement funds. The primary objective of the CDBG program is the development of viable urban communities by providing decent housing and a suitable living environment and through expanding economic opportunities, principally, for persons of low- and moderate-income. The ESG program provides grant funding to (1) engage homeless individuals and families living on the street, (2) rapidly re-house homeless individuals and families, (3) help operate and provide essential services in emergency shelters for homeless individuals and families, and (4) prevent individuals and families from becoming homeless.
- Farmers and Merchants Banks WISH Program: The WISH program is a matching grant program and is designed to offer member financial institutions an opportunity to support affordable, sustainable homeownership for first-time homebuyers while achieving their own community investment goals. Funding for WISH establishes grants for individual homebuyers through its members. The WISH program offers eligible low- to moderate-income households 4-to-1 matching grants of up to \$22,000 that can be applied to down payment and closing costs for the purchase of a home. WISH grants help working families and individuals move from renting to owning and can complement or supplement many local, state, and federal homeownership programs and initiatives.
- Project Homekey is an opportunity for state, regional, and local public entities to develop a broad range of housing types for people at risk of or currently experiencing homelessness, including but not limited to hotels, motels, hostels, single-family homes and multifamily apartments, adult residential facilities, and manufactured housing, and to convert commercial properties and other existing buildings to permanent or interim housing. Project Homekey is administered by HCD.
- The Low-Income Housing Tax Credit (LIHTC) program awards tax credits to developers of affordable housing projects, which can then be sold to investors to fund the project development. The California Tax Credit Allocation Committee (TCAC) develops scoring methodology and makes awards.
- HCD's Multi-Family Housing Program (MHP) makes low-interest, long-term deferred-payment permanent loans for new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households.

- HCD’s Predevelopment Loan Program (PDLP) makes short-term loans for activities and expenses necessary for the continued preservation, construction, rehabilitation, or conversion of assisted housing primarily for low-income households.
- HCD’s Infill Infrastructure Grant (IIG) program promotes infill development by providing financial assistance for Capital Improvement Projects that enable development of infill projects or in infill areas, as defined by the program guidelines.
- No Place Like Home Program (NPLH) funds the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or at risk of chronic homelessness. The program is administered by HCD.
- The Transit-Oriented Development (TOD) Housing Program administered by HCD provides low-interest loans as gap financing for rental housing developments near transit that include affordable units. In addition, grants are available to local governments and transit agencies for infrastructure improvements necessary for the development of specified housing developments, or to facilitate connections between these developments and the transit station.
- The Affordable Housing and Sustainable Communities (AHSC) program is administered by the Strategic Growth Council and implemented by HCD and provides funding to housing development that connects residents with jobs, amenities, and low-carbon transportation.
- Permanent Local Housing Allocation Program (PLHA) is a program administered by HCD. The PLHA provides a permanent source of funding to cities and counties to help meet the unmet need for affordable housing and increase the supply of affordable housing units. Stanislaus County and the cities of Modesto and Turlock are eligible to apply for PLHA funding.

While these programs are beneficial, many of them are also competitive, over-subscribed, and have many eligibility requirements that may be difficult for all projects and activities to meet. These programs are not a catch-all solution to supporting housing development, however, paired with other funding mechanisms, the programs overall reduce barriers to housing by providing financial support to reduce the costs of housing.

Private Financing for Homebuyers

Due to high housing costs, mortgage financing is required in most cases to purchase or improve a home. Lack of access to mortgage financing is a barrier to achieving housing stability through long-term stable housing costs afforded to homeowners, and lack of access to home improvement loans makes it difficult for homeowners to maintain their homes and preserve housing stability. The discussion on loan outcomes provided below is from the Stanislaus Urban County, City of Modesto, and City of Turlock Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice (AI), including outcomes by income and race.¹²

According to the 2020-2025 AI, data from 2018 indicates that about 16,000 loans originated in Stanislaus County, with 8,034 (50.2 percent) originating in the City of Modesto, 2,327 (14.5 percent) in Turlock, and 1,739 (10.9 percent) in the unincorporated County. Compared to previous years, the number of loan originations at the County level has decreased, although loan data for the County has shown that applications for individual jurisdictions have fluctuated over time.

¹² Stanislaus Urban County, City of Modesto, City of Turlock. Stanislaus County Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice. 2020. Available online at <https://www.stancounty.com/planning/cdbg/documents/other/2020-2025-analysis-impediments-final.pdf>, accessed March 3, 2023.

Mortgages and Loan Outcomes

Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. The primary purpose of this review of lending activity is to determine whether home financing is accessible to all residents of Stanislaus County. The data presented in this section includes the disposition of loan applications submitted to financial institutions for home mortgages, home improvement, and refinance loans in Stanislaus County.

A little over half of all applications (9,056 loans or 56.6 percent) were approved and almost a fifth (2,839 loans or 17.7 percent) were denied. Of the jurisdictions analyzed, loans originating in Turlock experienced the highest approval rate of 59.5 percent while applications in the unincorporated County cumulatively saw the lowest approval rate of 54.4 percent. When it came to loan denial rates, loan applications in Modesto had the lowest loan denial rate at 16.9 percent while loans in the unincorporated County had the highest loan denial rate at 20.0 percent. Notably, approval rates across Modesto, Turlock, and the unincorporated County are slightly higher than the national approval rate of about 53.4 percent.

Loan types include conventional purchase loans and government-backed loans that are guaranteed by the federal government including the Federal Housing Administration (FHA), Veterans Affairs (VA), and USDA Rural Housing Service or Farm Service Agency (RHS/FSA). In addition to general loan information below, loan outcomes may also be evaluated by income and race. Evaluating information by these types enables local governments to analyze discrepancies in outcomes by an applicant's demographic characteristics. Disaggregating lending outcomes in this regard (by income and race) is one way to look for differences.

Loan Outcomes by Applicant Income

For each of the three years analyzed, most individuals applying for a loan fell into the upper income bracket. For example, upper income individuals represented 45.3 percent of applicants in 2008, 43.6 percent of applicants in 2013, and 49.2 percent of applicants in 2018 (Table 4-13). Furthermore, the shares for applicants among the remaining income levels decreased as the income bracket decreased. In other words, there were fewer applicants in the lower income brackets. Regarding approval rates, upper-income applicants generally experienced the highest rates, which is a common finding across many jurisdictions.

Table 4-13 Loan Outcomes by Applicant Income Level in Stanislaus County

Applicant Income Level	Total Applicants		Approved		Declined		Other	
	#	%	#	%	#	%	#	%
2008								
Low (0-49% AMI)	1,228	4.6%	454	37.0%	463	37.7%	311	25.3%
Moderate (50-79% AMI)	4,287	16.0%	2,113	49.3%	1,041	24.3%	1,133	26.4%
Middle (80-119% AMI)	6,529	24.3%	3,110	47.6%	1,558	23.9%	1,861	28.5%
Upper (>= 120% AMI)	12,154	45.3%	5,867	48.3%	2,991	24.6%	3,296	27.1%
NA	2,626	9.8%	177	6.7%	78	3.0%	2,371	90.3%
Total	26,824	100.0%	11,721	43.7%	6,131	22.9%	8,972	33.4%
2013								
Low (0-49% AMI)	1,452	5.9%	780	53.7%	362	24.9%	310	21.3%
Moderate (50-79% AMI)	3,591	14.6%	2,006	55.9%	596	16.6%	989	27.5%
Middle (80-119% AMI)	5,155	21.0%	3,071	59.6%	760	14.7%	1,324	25.7%
Upper (>= 120% AMI)	10,727	43.6%	6,751	62.9%	1,460	13.6%	2,516	23.5%
NA	3,663	14.9%	1,266	34.6%	310	8.5%	2,087	57.0%
Total	24,588	100.0%	13,874	56.4%	3,488	14.2%	7,226	29.4%
2018								
Low (0-49% AMI)	889	5.6%	345	38.8%	305	34.3%	239	26.9%
Moderate (50-79% AMI)	2,006	12.5%	1,054	52.5%	529	26.4%	423	21.1%
Middle (80-119% AMI)	3,834	24.0%	2,380	62.1%	708	18.5%	746	19.5%
Upper (>= 120% AMI)	7,873	49.2%	5,094	64.7%	1,240	15.8%	1,539	19.5%
NA	1,398	8.7%	183	13.1%	57	4.1%	1,158	82.8%
Total	6,000	100.0%	9,056	56.6%	2,839	17.7%	4,105	25.7%

Source: Stanislaus County. 2020. Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice. Stanislaus County, California. May 12, 2020. <https://www.stancounty.com/planning/cdbg/documents/other/2020-2025-analysis-impediments-final.pdf> (Accessed September 2022).

Loan Outcomes by Applicant Race

Table 4-14 presents the loan outcomes by race for applicants in Stanislaus County for 2008, 2013, and 2018. Chapter 3, *Assessment of Fair Housing*, examines mortgage applications and decisions by race in more detail. Overall, Black/African American, American Indian/Alaska Native, and Hispanic/Latino residents were underrepresented in the number of applications filed. Denial rates were also higher for those racial and ethnic groups. As discussed further in Chapter 3, *Assessment of Fair Housing*, disproportionate lack of access to financing is a fair housing issue.

Table 4-14 Loan Outcomes by Applicant Race and Ethnicity

	Percent Total Applicants			Percent Approved			Percent Denied		
	2008	2013	2018	2008	2013	2018	2008	2013	2018
Unincorporated									
White	71.5%	99.6%	65.2%	47.7%	54.9%	61.5%	26.2%	16.6%	18.9%
Black	1.1%	0.0%	1.8%	40.7%	0.0%	64.5%	25.9%	100.0%	25.8%
Hispanic	23.6%	18.5%	25.5%	40.7%	59.5%	57.6%	31.2%	17.5%	24.2%
Asian	3.2%	0.1%	4.3%	48.1%	50.0%	49.3%	23.4%	50.0%	29.3%
Average	–	–	–	43.8%	54.9%	54.4%	24.5%	16.7%	20.0%
Stanislaus County									
White	68.2%	67.1%	63.7%	50.0%	64.2%	63.8%	23.7%	14.5%	17.3%
Black	1.6%	1.6%	2.1%	35.6%	54.2%	57.1%	33.3%	20.3%	19.8%
Hispanic	26.9%	21.7%	26.8%	45.0%	60.2%	59.7%	28.7%	16.4%	21.8%
Asian	4.5%	6.1%	5.6%	47.5%	62.7%	55.4%	25.1%	17.6%	23.6%
Average	–	–	–	43.7%	56.4%	56.6%	22.9%	14.2%	17.7%

Source: Stanislaus County. 2020. Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice. Stanislaus County, California. May 12, 2020. <https://www.stancounty.com/planning/cdbg/documents/other/2020-2025-analysis-impediments-final.pdf> (Accessed September 2022).

According to the policies and actions from the 2020-2025 Stanislaus County Analysis of Impediments, differential origination rates based on race, ethnicity, and location in the County and limited coordination with the real estate industry were identified as impediments to housing. Additionally, the following actions were identified to address those impediments:

- **Action 3.1:** When selecting lending institutions for contracts and participation in local programs, Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, the Stanislaus Urban County and the City of Turlock may review an individual institution’s most recent HMDA reporting as most recently published by the FFIEC.
- **Action 3.2:** Strengthen partnerships with lenders to discuss lenders’ community reinvestment goals, including home mortgages, home improvement loans, and community development investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.
- **Action 4.1:** Work cooperatively with the real estate industry to develop ways for local agents to become more familiar with Stanislaus Urban County and City of Turlock housing and rental assistance programs.
- **Action 4.2:** Encourage Realtors to seek fair housing training.

As a result of these actions, and to address this constraint in the Housing Element, the County will implement Program 5-1b to give preference to lending institutions with a good Community Reinvestment Act rating.

4.3 Infrastructure Constraints

Stanislaus County has identified the need for improved infrastructure within unincorporated areas, including through its Board Priorities, which provide guidance to effectively manage public resources and improve certain efficiencies. As related to infrastructure, the goals include:

- Improve energy efficiency
- Ensure reliable water sources – quality and quantity
- Improve transportation and circulation
- Promote effective solid waste disposal
- Develop a comprehensive flood control strategy

Often, counties are constrained by the financial feasibility of investment in unincorporated communities that are not in proximity to urban services. For example, residential sewer and water may be provided to urban residents, while the provision of these services to unincorporated rural parts of the County are left to property owners. Investment in infrastructure such as sewer and water to more distant areas require a significant amount of planning, including an appropriate funding mechanism, sufficient capacity in the near-term and in the future, and a means to support construction, service, and maintenance. These infrastructure challenges expand beyond just sewer and water in rural areas and may also include county-maintained roads and other transportation or safety-related infrastructure. As noted above, the County of Stanislaus has identified these priorities and realizes some of the challenges they present toward housing development, including the development of multifamily housing.

While many unincorporated areas may be infrastructure constrained, a key community in the area that has been envisioned for development is the Salida area. Noted previously, the Salida Community Plan was adopted by the Stanislaus County Board of Supervisors in 2007 and provides land use planning and guidance for development of approximately 4,600 acres of land in the Salida area. Existing land uses in the community plan area include agricultural land uses with little to no water and sewer infrastructure to advance residential development. Table 2-2 in Section 2.1.1 above identifies the community plan residential land use designations for the Salida area, including zone districts that offer opportunity for multifamily and affordable housing. The County's 5th Cycle Housing Element relied heavily on this community plan to accommodate its lower-income housing needs. While portions of the Salida Community Plan are included in the City of Modesto's Water Master Plan and within the boundaries of the Salida Sanitary District, the County cannot rely on the plan area for the 6th Cycle Housing Element due to the inability to advance infrastructure development over the previous Housing Element Cycle. The County will facilitate the necessary environmental review needed to allow for housing within the Salida area.

The 2020-2025 Stanislaus County Analysis of Impediments identifies infrastructure as a clear constraint to housing development. Action 8.1 states, "Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans." In accordance with Action 8.1, the County should analyze the gaps in public infrastructure and services, including accommodations for lower-income housing needs and the needs of seniors and persons with disabilities. Infrastructure is therefore identified as a constraint

and the County will implement Program 3-9b to continue exploring methods to address the gaps and improve public and social services, and infrastructure support for local communities.

In 2021, Stanislaus County received \$107 million in funding through the American Rescue Plan Act of 2021 (ARPA). The Board of Supervisors approved various strategic priorities for the use of \$90 million, of this, \$50 million was assigned to Community Infrastructure – Urban Pockets/County Communities. These investments include updated sanitary sewer infrastructure, sidewalk improvements, storm drain facilities, water lines, and streetlights. This funding will significantly decrease the gap in the provision of services and infrastructure.

4.4 Environmental Constraints

A community's environmental setting affects the feasibility and cost of developing housing. Environmental issues range from the availability of water to the suitability of land for development due to potential exposure to seismic, flooding, wildfire, and other hazards. The presence of environmental hazards limits the ability to construct safe and quality housing. If not properly recognized and accommodated in residential development, these environmental features could potentially endanger lives and property. Additional information on environmental hazards in the County and their effect on local communities are discussed in the Environmental Justice Technical Report. The General Plan Safety Element contains much more detail about hazards, including maps and policies to address environmental hazards.

4.4.1 Federal and State Environmental Protection Regulations

California regulations require an environmental review of proposed discretionary projects (e.g., subdivision maps, development of large sites, use permits, etc.) that do not fall within specified exemptions outlined in California Environmental Quality Act (CEQA) Statute and Guidelines. Additionally, federal environmental review is required when federal funding or lands are involved. Costs to analyze and address impacts result from fees charged by local government agencies and private consultants to complete the environmental analysis and can add to the cost of building new housing, which is passed on to the consumer. While these regulations disclose impacts and help preserve the environment and mitigate environmental impacts, they do not necessarily pose a constraint on housing development.

The County has updated its Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) in 2022. This plan addresses hazard vulnerabilities from natural and human-caused hazards, including flooding, drought, wildfire, landslides, severe weather, terrorism, cyber threats, pandemic, and the impact of climate change on hazards, as well as other hazards. While mitigation measures identified in the MJHMP are necessary to reduce the level of injury, property damage, and community disruption that might otherwise result from such events, requirements may be a constraint to housing development. For example, building safety requirements or increased buffers in fire or landslide zones may increase costs of development and limit available land. The analysis that follows summarizes the hazards that could be identified as a constraint to housing development.

4.4.2 Geologic and Seismic Hazards

Earthquake

Earthquakes can cause structural damage, injury, and loss of life, as well as damage to infrastructure networks such as water, power, gas, communication, and transportation lines. There are several faults known to exist within Stanislaus County. The nearest faults of major significance are the San Andreas to the west of Stanislaus County, a distance of approximately 25 miles from the County line; the Calaveras faults to the northwest; the White Wolf, Garlock, and Sierra Nevada faults to the south; and the Bear Mountain Fault Zone about 5 miles east of and parallel to the eastern border of Merced County. These faults have been and will continue to be the principal source of seismic activity affecting the County of Stanislaus.¹³

Structures and populations along the Interstate 5 corridor and within the Diablo Range are most vulnerable to damage. All populations are vulnerable to impacts of any earthquake. However, the area of the county identified for the most intense shaking is the least populated.

All property within Stanislaus County is subject to the effect of seismic activity. Structures built prior to 1976 are most vulnerable. Hazard maps indicate that the area along the western-most edge of the valley floor near the Interstate 5 corridor has the greatest potential for probabilistic shaking.

The Stanislaus County Capital Improvement Plan, along with the Capital Project Program, supports the goal of the County to protect critical facilities and infrastructure. The Capital Projects Team is actively working to incorporate MJHMP priorities in the CIP development to protect facilities and infrastructure. The most recent CIP identified eight seismic bridge replacements to rectify seismic deficiencies. Earthquakes can be unexpected and detrimental to infrastructure and housing especially for housing built prior to 1976. The 2022 MJHMP identifies several objectives to limit development in areas with high geologic hazard, and to rehabilitate structures that are not earthquake resistant. The County will explore programs to retrofit existing housing to comply with current building code standards in order to preserve existing housing stock through Programs 1-1a, 1-1b, and 1-1h.

Landslides and Erosion

Excessive erosion can contribute to landslides, siltation of streams, undermining of foundations, and ultimately the loss of structures. The Stanislaus County MJHMP states that hazards due to landslide events are limited to areas within the foothills which are located in the western and eastern edges of the County. Deep-seated landslide susceptibility is mostly located west of the I-5 freeway, with a susceptibility class ranging between seven to ten (ten being the highest). However there have not been any disastrous events associated with landslides in Stanislaus County¹⁴. Further, any new development will be subject to mitigation measures contained in the County's Safety Element. These include, only approving new development in areas of geologic hazards when there is an acceptable evacuation route, and the routes of public roads are designed to minimize seismic risk. Additionally, the development west of I-5 will only be permitted when a geological report provides evidence that there are no onsite hazards, or they can be mitigated. Future projected housing developments are located outside of the areas with increased susceptibility to landslides. Therefore, landslide risk does not constrain housing development.

¹³ <https://www.stanoes.com/pdf/mjhmp/2022-MJHMP-draft.pdf>

¹⁴ Stanislaus County Local Hazard Mitigation Plan, 2017, <https://www.stanoes.com/pdf/lhmp/2017-lhmp.pdf>

4.4.3 Wildfire

Stanislaus County is susceptible to both urban and wildland fires. The areas most vulnerable to wildfire are in the State Responsibility Areas (SRA) on the eastern and western edges of the County (see Figure V-6 of the County's Safety Element). There has been little to no development within the majority of the SRA with the exception of the development in Diablo Grande. There has also been development of ranchettes, two-to-ten-acre homesteads, on the eastern side of the county between Knights Ferry and the City of Oakdale. These ranchettes are located primarily in the SRA. Cal FIRE has designated Knights Ferry, La Grange, Oakdale, and Riverbank as communities with increased risk from wildfires¹⁵. A small percentage of the County's total area currently with housing or identified for future housing is within a Very High Fire Severity Zone (see Figure V-6 of the County's Safety Element). Future housing within high fire zones must have higher development costs due to the additional materials and safety measures required to additionally protect the residents and property. Due to the small percentage of current and future housing in the Very High Severity Zone, Wildfire is not considered a constraint.

4.4.4 Flood Risk

In western parts of Stanislaus County, there is a higher number of acres located within the San Joaquin River floodplains. Construction in the floodplain has the potential to impact flood levels, and the properties may be susceptible to flood damage. There has been little to no development within the floodplains. The community of Grayson borders the boundary of the 100-year floodplain. The county is actively working to identify solutions aimed at lowering flooding risks. Due to the small percent of current and future housing located in the floodplain, flooding is not considered a constraint.

4.4.5 Excessive Noise

Residential uses are considered sensitive land uses and new development must be constructed such that it meets interior noise standards in the County's General Plan. The County's Noise Regulations can be found in Chapter 10.46 Noise Control of the Stanislaus County Municipal Code.

According to the Noise Element (Chapter IV) of the County's General Plan, highways and freeways are the most significant sources of noise affecting sensitive land uses in Stanislaus County. This is followed by other roadway traffic such as principal arterials, minor arterials, and major collectors. In addition to traffic noise on local roadways, freight and passenger trains contribute to community noise levels¹⁶. While these requirements may impose specific mitigation or building requirements related to housing development, they are not considered a significant constraint to development.

¹⁵ CAL FIRE, 2022, <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/fire-plan/communities-at-risk/>

¹⁶ <https://www.stancounty.com/planning/pl/gp/current/gp-chapter4.pdf>

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5 Housing Resources

This chapter documents the methodology and results of the housing sites inventory analysis conducted to demonstrate Stanislaus County's ability to satisfy its share of the region's future housing need. Infrastructure, services, and financial and administrative resources available for the development, rehabilitation, and preservation of housing in the County are also discussed in this chapter.

5.1 Regional Housing Needs Assessment Requirement

State law requires each community to play a role in meeting the region's housing needs. A jurisdiction must demonstrate in its Housing Element that its land inventory is adequate to accommodate its share of the region's projected growth. This section assesses the adequacy of Stanislaus County's land inventory in meeting future housing needs.

This update of the County's Housing Element covers the planning period of December 31, 2023, through December 31, 2031 (called the 6th cycle Housing Element update). The California Department of Housing and Community Development (HCD) is responsible for determining the regional housing need for each region's planning body known as a "council of governments" (COG). After a consultation process between each region's COG and HCD, the final regional housing need for the region is issued by HCD.

Stanislaus County's share of the regional housing need is allocated by the Stanislaus Council of Governments (StanCOG) based on a public methodology detailed in the 6th cycle Regional Housing Needs Allocation Plan based on recent growth trends, income distribution, and capacity for future growth. The RHNA methodology uses weighting of indicators such as opportunity access and job proximity to allocate housing units by different income categories. The County must identify adequate land with appropriate zoning and development standards to accommodate its assigned share of the region's housing needs. The County's share of regional future housing needs is 2,475 total units. The RHNA process does not project the need for extremely low-income units, but pursuant to state law (AB 2634), the County must project its extremely low-income housing needs based on Census income distribution or assume 50 percent of the very low-income units required by the RHNA as extremely low-income units. The number of units is distributed among five income categories, as shown below in Table 5-1.

Table 5-1 Unincorporated Stanislaus County Housing Needs for 2023-2031

Income Category (% of Stanislaus County Area Median Income [AMI])	Number of Units	Percent of Total Units
Extremely Low (< 30% of AMI)	275	11.1%
Very Low (30 to 50% of AMI)	299	12.1%
Low (51 to 80% of AMI)	398	16.1%
Moderate (81% to 120% of AMI)	458	18.5%
Above Moderate (> 120% of AMI)	1,045	42.2%
Total	2,475	100.0%

Note: The RHNA does not project the need for extremely low-income units. The County’s projected need for extremely low-income units is based on Census data for the income distribution within the city. State law does not mandate separate accounting for the extremely low-income category.

Source: Final Regional Housing Needs Allocation (RHNA), StanCOG, 2022

StanCOG is required to allocate units across income categories to reduce the concentration of lower-income households in historically lower-income communities. The RHNA for each jurisdiction is distributed into four income categories based on the Area Median Income (AMI):

- Very Low Income (less than 50 percent of AMI)
- Low Income (50-80 percent of AMI)
- Moderate Income (80-120 percent of AMI)
- Above Moderate Income (more than 120 percent of the AMI)

The County’s very low-income requirement is 574 units. The number of extremely low-income included here was projected using Census data. According to 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data, developed by the United States Department of Housing and Urban Development (HUD), 24.5 percent of households in the county earned less than 50 percent of the AMI. Among these households, 48 percent earned incomes below 30 percent (extremely low). Therefore, the County’s RHNA allocation of 574 very low-income units was distributed as 275 extremely low (48 percent of the 574 very low-income units required by the RHNA) and 299 very low-income units. However, for the purpose of identifying adequate sites for the RHNA allocation, state law does not mandate separate accounting for the extremely low-income category.

5.2 Fulfilling the RHNA Obligation

Jurisdictions can use planned and approved projects, estimated accessory dwelling unit (ADU) production, and the potential development capacity of vacant and underutilized sites to accommodate the RHNA. Vacant and underutilized sites must have adequate zoning for the development of housing across income categories.

5.2.1 Planned or Approved Units

Residential developments planned, approved, and permitted, but not yet built (“pipeline projects”) can be credited towards the County’s RHNA for the 6th cycle Housing Element provided it can be demonstrated that the units will be built by the end of the 6th cycle’s planning period. Affordability (the income category in which the units are counted) is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability of the units within the project. Single-

family homes are usually sold at market-rate prices, with no affordability covenants attached to the land. Multifamily or single-family developments that use density bonuses, public subsidies, or other mechanisms that restrict rents or sales prices would be restricted to specified below-market rate prices affordable to households in the various income categories described above.

There are currently 9 projects in the development pipeline as shown in Figure 5-1. Together, these projects include 253 market-rate units affordable to above-moderate households. Table 5-2 identifies the approved projects.

5.2.2 Accessory Dwelling Units (ADU)

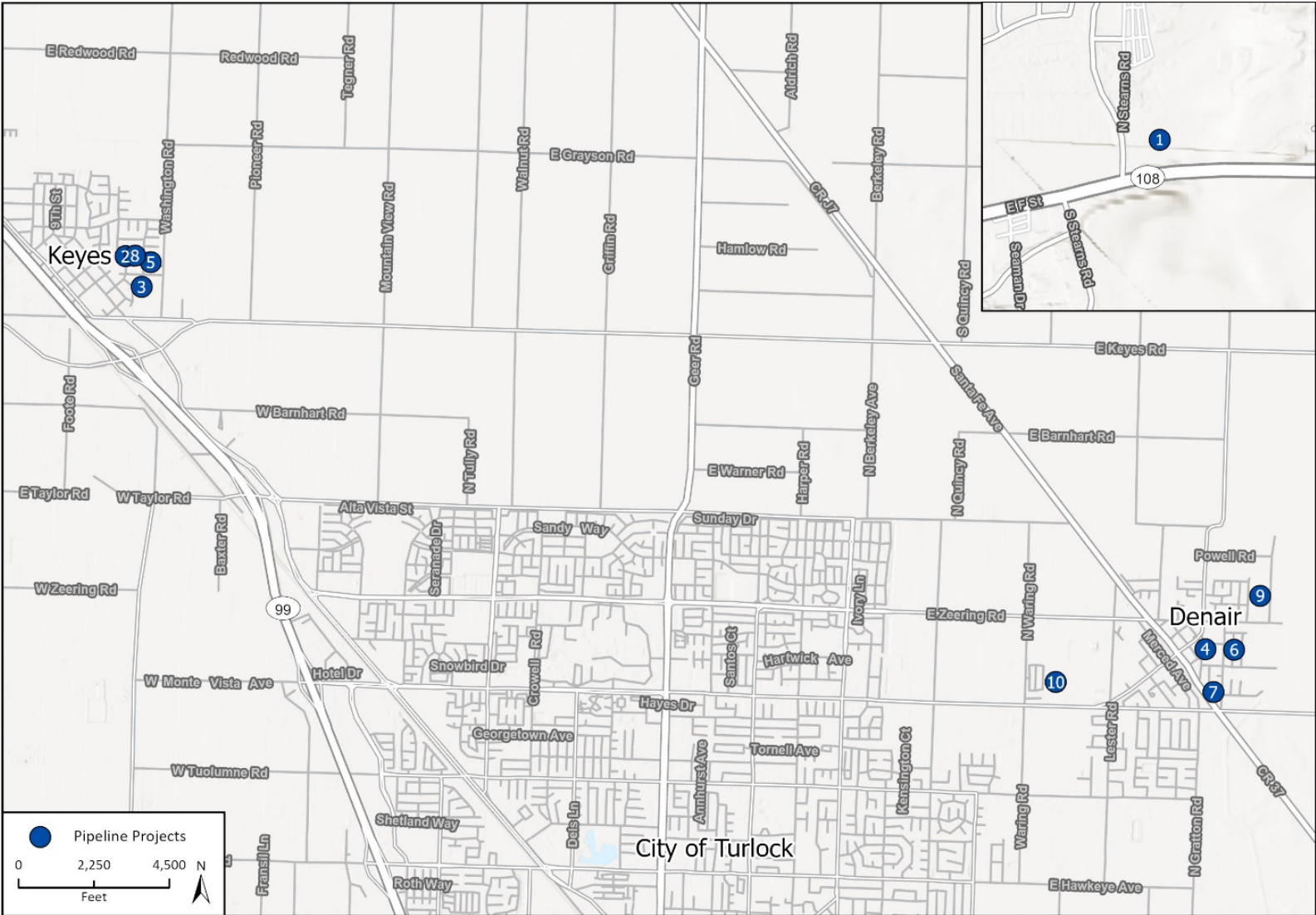
Accessory dwelling units (ADUs) anticipated to be built between 2023 and 2031 are also credited towards the County's RHNA. An ADU is a secondary dwelling unit on residentially zoned property with an existing single-family or multi-family residence. Due to its small square footage, it could provide affordable housing options for family members, friends, students, the elderly, in-home health care providers, the disabled, and others.

A total of 95 ADUs were permitted between January 2019 and December 2022. Trends in the County indicate that the number of ADU permit applications have been increasing in recent years. The County of Stanislaus Building Permits Division permitted 13 ADUs in 2019, 14 in 2020, 26 in 2021, and 42 in 2022. This overall increase in ADU permits is likely due to recent state legislation that has reduced regulatory barriers to permit and build ADUs. Assuming annual permits will average 23 units per year, the County has assumed 184 ADUs will be permitted between 2023 and 2031. ADUs are often leased for rates affordable to lower-income households due to their typically smaller size and tendency to be rented to friends and family of the property owner. However, given that no restrictions on rent are required, the County assumes all 184 ADUs will be affordable to above moderate-income households.

Table 5-2 Planned and Approved Projects

Map ID	Project Name	APN (Assessor Parcel Number)	Zoning	Acreage	Total New Units	Entitlement Status	Date of Approval or Building Permit Issuance
1	Fairway 7 Estates	064-081-001 to -013	R-A	8.10	8	Approved	August 3, 2006
2	Gold Star Investments, LLC	045-071-006	R-1	9.54	28	Approved	November 6, 2018
3	WPD Homes, Inc.	024-024-037	P-D (356)	1.32	10	Approved	August 17, 2021
4	Orange Grove Estates	045-021-041	R-1	2.11	8	Approved	July 17, 2022
5	Elmwood Estates	024-055-060	P-D (367)	4.82	17	Approved	December 6, 2022
6	Isaaco Estates	024-025-002, -014, -052, -053	R-A	3.10	11	Approved	September 16, 2021
7	Keyes 19 South	045-071-005	R-1	6.70	26	Approved	September 15, 2016
8	Hoffman Ranch Subdivision	024-022-027	P-D (369)	15.90	76	Approved	June 6, 2023
9	Lazares Subdivision	024-012-009	P-D (366)	18.20	69	Approved	August 16, 2022
Total					253		

Figure 5-1 Planned and Approved Projects



5.2.3 Remaining Share of RHNA

After counting anticipated units from pipeline projects and anticipated ADUs, the County must demonstrate its ability to meet its remaining housing needs through the identification of sites suitable for housing development. Government Code Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development. The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period (Section 65583.2). This inventory of suitable land is called the Sites Inventory. A detailed, parcel-specific Sites Inventory is provided in Appendix C.

Table 5-3 shows the remaining RHNA after subtracting 437 anticipated units from pipeline projects and ADUs. The County has satisfied approximately 18 percent of its total RHNA allocation for the 2023-2031 planning period. The County must demonstrate the availability of sites with appropriate zoning and development standards that allow and encourage the development of an additional 2,038 units. This total includes 574 very low-income, 398 low-income, 458 moderate-income, and 608 above moderate-income units.

Table 5-3 Remaining Share of RHNA

Affordability Category	RHNA Allocation	Units Pending or Approved or Under Construction	Estimated ADUs	Remaining RHNA
Very Low	574	0	0	574
Low	398	0	0	398
Moderate	458	0	0	458
Above Moderate	1,045	253	184	608
Total	2,475	253	184	2,038

5.2.4 Capacity of Identified Residential Sites Under Current Zoning

To demonstrate capacity to accommodate the remaining RHNA, the County has identified sites with zoning suitable for housing development before 2031. Pursuant to Government Code Section 65583.2(c), the County must calculate the realistic development capacity (the realistic number of units that could be built) of the sites identified. On sites where existing residential units are expected to be redeveloped, the number of existing units on the site is subtracted to provide a net unit count that can be applied towards the RHNA. Where existing residences are expected to remain, the estimated capacity of the site was reduced based on the amount of land available for development while maintaining existing structures.

The Sites Inventory includes parcels in six zoning districts with varying allowable densities in the following zones:

- **Rural Residential (R-A).** This zone provides single-family residential uses on larger lots, small-scale agricultural operations, and related development standards. The County’s Zoning Code classifies each site permits densities up to one dwelling unit per three acres.
- **Single Family Residential (R-1).** This zone provides for single-family residential uses and related activities at densities up to eight dwelling units per acre if served by public water and sewer, or two dwelling units if served by a septic system.

- **Medium Density Residential (R-2).** This district provides for low-density residential uses and related activities as permitted in the R-1 zone and for multi-family dwellings at densities up to 14 dwelling units per acre.
- **Multiple-Family Residential (R-3).** This district provides for any residential uses and related activities as permitted in the R-1 and R-2 zone and for multi-family dwellings and apartment houses at densities up to 25 dwelling units per acre.
- **Planned Development (P-D).** Planned Development zoning provides opportunities for larger-scale projects incorporating creative and cohesive design concepts. The district is intended to allow modification of requirements established by other districts and diversification in the relationship of different uses, buildings, structures, lot sizes and open spaces, while ensuring compliance with, and implementation of the General Plan. The P-D-zoned sites included in the inventory are already subdivided and allow one dwelling unit per parcel.
- **Highway Frontage (H-1).** The H-1 zone provides highway-oriented uses and related activities and with a use permit allows residential uses as provided in the R-3 zone at densities up to 25 dwelling units per acre.

In addition to zoning districts listed above, additional residential capacity has been identified in the Diablo Grande Specific Plan (DGSP). The DGSP sites included in the inventory are subdivided and allow one dwelling unit per parcel.

The County assumes the realistic development capacity of the identified sites may be less than the full development capacity allowed by the parcel's zoning and land use designation. This conservative assumption is based on site-specific conditions and development standards that may reduce the development potential of a given site. Parking requirements, the necessity of flood control infrastructure, and irregularly shaped parcels all impact the ability to achieve the maximum density allowed by the zoning code. A detailed discussion of the suitability of identified sites is presented in Sites Inventory Methodology and Justification.

Multifamily Residential Development Trends

Due to the rural land use patterns and lack of infrastructure in unincorporated areas of the County, there are few examples of multifamily development. To support density assumptions for the Sites Inventory, the County reviewed 10 multifamily projects developed in incorporated communities in Stanislaus County within the last 10 years. As shown in Table 5-4 below, the incorporated communities of Stanislaus County have seen multifamily residential development across a variety of scales and zoning districts. While new multifamily developments are less common in the unincorporated areas of the county, Programs 3-1, 3-6, and 3-7 of the Housing Plan are intended to facilitate multifamily development similar to the recent projects identified. Site characteristics of example projects used to establish development trends in the past decade, including zoning district, previous uses, and percent of allowable density achieved, are consistent with the assumptions made for the Sites Inventory.

Table 5-4 Typical Densities of Multifamily Projects in Stanislaus County

Project	Jurisdiction	Zoning	Max Density	Site Acreage	Total Units	Achieved Density (du/acre)	Percent Yield
Oak Leaf Meadows	Oakdale	R-2	14	3.25	56	17.2	123%
Stonegate Village	Patterson	Medium Density Residential	12	7.00	138	19.7	164%
Avena Bella, Phase 2	Turlock	Planned Development	30	2.20	61	27.7	92%
Archway Commons Phase 1	Modesto	Planned Development	29	4.50	76	16.9	58%
Archway Commons Phase 2	Modesto	Planned Development	29	3.17	74	23.3	80%
3313 Coffee	Modesto	Planned Development	29	0.9	15	16.3	56%
0 Vine Street	Modesto	Planned Development	29	0.6	35	62.0	214%
3600 Dale	Modesto	Planned Development	29	1.7	44	25.6	88%
112 James Street	Modesto	R-3	29	0.3	7	25.6	88%
WPD Homes Duplexes	Unincorporated Stanislaus County	Planned Development	14	0.77	10	13.0	92%
Average						24.7	106%

On average, multi-family developments throughout the county achieved densities of 25 dwelling units per acre and on average achieved 100 percent of the maximum density allowed on the site. It is anticipated that this trend will continue in the unincorporated county as land becomes available for subdivision and development. Table 5-5 shows the assumed realistic capacity of sites for each zone district.

To ensure that the estimates of capacity given in the Sites Inventory are conservative, the County assumes the following realistic densities for identified sites:

- 4 dwelling units per acre (75 percent of maximum density) on sites that are zoned for a maximum density of 5.4 units per acre;
- 6.5 dwelling units per acre (75 percent of maximum density) on sites that are zoned for a maximum density of 8.7 units per acre;
- 10.5 dwelling units per acre (75 percent of maximum density) on sites that are zoned for a maximum density of 14 units per acre;
- 16 dwelling units per acre (64 percent of maximum density) on sites zoned for a maximum density of 25 dwelling units per acre.

Programs in this Housing Element will ensure that sites in inventory develop at anticipated densities, by the following actions:

- Rezone sites to accommodate the shortfall of available capacity in accordance with the housing Sites Inventory;
- Update the County’s density bonus ordinance;
- Review all residential zoning districts and land use designations to determine feasibility for additional development in low-density neighborhoods;
- Continue to offer free Pre-Application Review process for developers or applicants that submit a planning application;
- Develop objective standards for multifamily housing, including requirements for parking, and identify objective standards to support streamlined housing approval;

Table 5-5 Realistic Capacity of Sites with Current Zoning

Zoning District	Total Acreage	Maximum Density	Realistic Density	Lower Income Units	Moderate Income Units	Above Moderate Income Units	Total Units
R-A	210.09	5.4	4.0	0	0	364	364
R-1	21.87	8.7	6.5	0	0	123	123
R-2	21.49	14.0	10.5	0	151	0	151
R-3	17.6	25.0	16.0	44	158	0	202
H-1	8.95	25.0	16.0	86	37	0	123
P-D	81.9	1.0	0.8	0	0	65	65
P-D	25.91	1 unit/parcel*	1 unit/parcel*	0	0	48	48
DGSP	155.31	1 unit/parcel*	1 unit/parcel*	0	0	112	112
Total	543.12			130	346	712	1,188
Remaining RHNA after Credits (see Table 3-3)				972	458	608	2,038
Shortfall (Surplus) of Zoned Capacity				842	112	(104)	954

* There are currently 48 vacant P-D parcels and 112 vacant parcels in the Diablo Grande Specific Plan area available for development.

Based on the methodology detailed above, the Sites Inventory identifies vacant and underutilized sites with existing zoning that have the capacity to accommodate over 100 percent of the County’s remaining RHNA for above-moderate income units, 75 percent of the remaining RHNA for moderate income units, and approximately 13 percent of the remaining RHNA for lower-income households. There remains a shortfall of capacity to accommodate 842 housing units affordable to lower-income households and 112 housing units affordable to moderate-income households.

5.2.5 Rezoning to Accommodate a Shortfall of Residential Capacity

To accommodate this shortfall of capacity, the County is obligated to rezone land suitable to facilitate the development of at least 842 housing units affordable to lower-income households and 112 housing units affordable to moderate-income households. The rezone program will allow the development of higher-density multifamily housing as detailed in Program 3-1 of the Housing Plan.

The County anticipates beginning the rezone process for all properties identified in the Sites inventory with outreach and public hearings beginning Spring 2024 and continuing through Winter 2024.

The Sites Inventory includes 54 sites that will be rezoned to facilitate additional residential development. All sites will be rezoned to allow a maximum density of at least 25 dwelling units per acre and require a minimum density of 16 dwelling units per acre. The county assumes that for all sites identified to be rezoned, the realistic residential density of the site is equal to the required minimum density of the relevant zone district. Table 5-6 summarizes the capacity of sites proposed for rezoning.

Table 5-6 Realistic Capacity of Rezoned Sites

Zoning District	Total Acreage	Maximum Density	Realistic Density	Lower Income Units	Moderate Income Units	Above Moderate Income Units	Total Units
R-3	94.13	25	16	1,106	184	0	1,290
Planned MU-1	5.30	25	16	32	51	0	83
Total Units	99.43			1,138	235	0	1,373

5.3 Adequacy of the Sites Inventory

The sites identified in the inventory can accommodate 1,188 residential units based on the residential densities allowed under current zoning. In addition, the County will apply 253 units from planned and approved housing projects and 184 units of anticipated ADU production. Capacity for an additional 1,373 units will be accommodated on sites to be rezoned following the adoption of this Housing Element.

In total, the Sites Inventory has identified sites to accommodate the development of 2,561 units. This would give the County a 30 percent buffer for lower-income units to ensure that the Sites Inventory has adequate capacity to accommodate the RHNA for lower-income levels throughout the planning period. The County can accommodate more than 60 percent of its RHNA for lower-income units on vacant land suitable for residential development.

Through Program 3-2, the County will monitor development on sites listed in the inventory and how this development contributes to or detracts from overall progress toward meeting its share of the RHNA. A summary of the results of the residential Sites Inventory is presented in Table 5-7.

Table 5-7 Adequacy of Residential Sites Inventory

	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	972	458	1,045	2,475
Planned and Approved Units	0	0	253	253
ADUs Anticipated	0	0	184	184
Remaining RHNA	972	458	608	2,038
Total Units on Vacant/Underutilized Sites (Not to be Rezoned)	116	346	712	1,174
Total Units on Rezoned Sites	1,120	184	0	1,304
Total Units on Vacant Sites	588	198	456	1,242
Total Units on Non-Vacant Sites	680	383	256	1,319
Total Units	1,268	581	712	2,561
Total Unit Surplus	296	123	104	523

5.4 Sites Inventory by Community

The sites inventory identifies residentially zoned vacant and underutilized properties in various unincorporated communities throughout the county as well as non-residential sites suitable for rezoning to accommodate higher density residential development. It should be noted that Measure E, which limits redesignation or rezoning of land in the unincorporated area from agricultural or open space use to residential use, represents a constraint to the availability of sites for the development of housing. This Measure is at odds with the County’s ability to meet the State mandated RHNA. Measure E is discussed further in *Section 2.1.11 Growth Management*.

Overall, the intention of the Stanislaus County sites inventory is to focus development within existing communities where infrastructure and services are in place to support multifamily development. The sites identified in this inventory have a potential development capacity of 2,561 units. A detailed, parcel-specific list of all sites is provided in Appendix C. The following discussion of the Sites Inventory is divided into 17 unincorporated areas:

- Airport
- Bret Harte
- Crow’s Landing
- Del Rio
- Denair
- Diablo Grande
- Empire
- Grayson
- Hickman
- Keyes
- North Ceres
- South Ceres
- Oakdale
- Salida
- Turlock
- Valley Home
- West Modesto

5.4.1 Airport

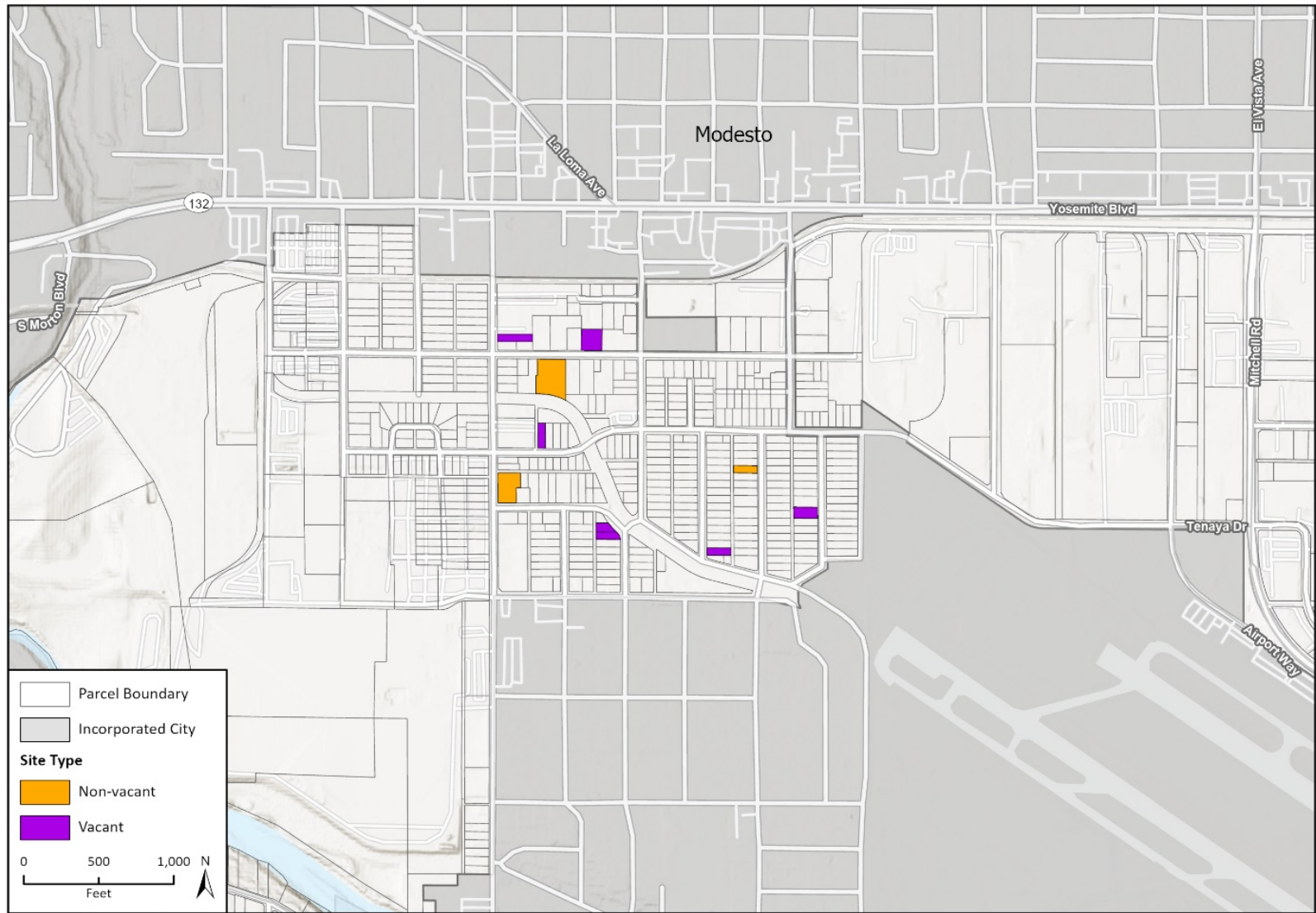
The Airport community is part of unincorporated Stanislaus County and shares a border with the City of Modesto which provides water and sewer service to the area. Most of the community is zoned for residential uses, with the largest portion zoned R-3 multi-family. The properties identified in the Sites Inventory are vacant and fall within the multi-family zone. No rezoning is proposed. Table 5-8 summarizes available capacity in the Airport neighborhood.

Table 5-8 Residential Capacity in Airport

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	10	3.6	12	32	0	44
Rezoned Sites	0	0.0	0	0	0	0
Total	10	3.6	12	32	0	44

The Sites Inventory identified 3.6 acres of vacant and underutilized land within the Airport community (as shown in Figure 5-2) which can accommodate 44 housing units.

Figure 5-2 Sites Identified in Airport



5.4.2 Bret Harte

Bret Harte is an unincorporated community south of the City of Modesto. Sites identified in this area are vacant residential properties or occupied by aging auto sales and service uses. Infrastructure for sewer and water service is provided by the City of Modesto. Table 5-9 summarizes available capacity in the Bret Harte neighborhood.

Table 5-9 Residential Capacity in Bret Harte

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	18	4.22	0	0	24	24
Rezone Sites	10	29.67	419	51	0	470
Total	28	33.89	419	51	24	494

The Sites Inventory identified 4.22 acres of vacant and underutilized land within Bret Harte (as shown in Figure 5-3) which can accommodate 24 housing units. Approximately 24 acres of land over 5 single-family residential zoned parcels surrounding Fairview Park will be rezoned to accommodate residential development at 25 dwelling units per acre. An additional five general commercial zoned sites encompassing 5 acres will be rezoned to a new mixed-use district accommodating a maximum density of 25 dwelling units per acre. Including the proposed rezoning, an estimated 494 housing units are projected in the Bret Harte community. The Crows Landing Road commercial corridor is also the subject of the City of Modesto's Southwest Modesto Plan which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, and infrastructure extending to the unincorporated area. The Southwest Modesto Plan and Modesto's Housing Plan both modeled a blend of high-density residential and commercial development on several vacant and underutilized sites along the Crows Landing Road corridor.

5.4.3 Crows Landing

Crows Landing is a small community located where State Route 33 intersects with Fink Road/Crows Landing Road in southwest Stanislaus County. The majority of the community is zoned for agriculture, with some commercial, industrial, and rural residential zones. All sites identified for the inventory are vacant parcels in the rural residential zone. Water is provided by the Crows Landing Community Services District, and sewage is handled by individual septic systems. Table 5-10 summarizes available capacity in Crow's Landing.

Table 5-10 Residential Capacity in Crow's Landing

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	5	1.34	0	0	5	5
Rezoned Sites	0	0.00	0	0	0	0
Total	5	1.34	0	0	0	5

Due to the age and limited capacity of the existing water system and the lack of adequate sewer service for additional multifamily development in Crows Landing, no sites are proposed for rezoning. The Sites Inventory identified four vacant rural residential properties in the area suitable for the development of five housing units, as shown in Figure 5-4.

Figure 5-3 Sites Identified in Bret Harte

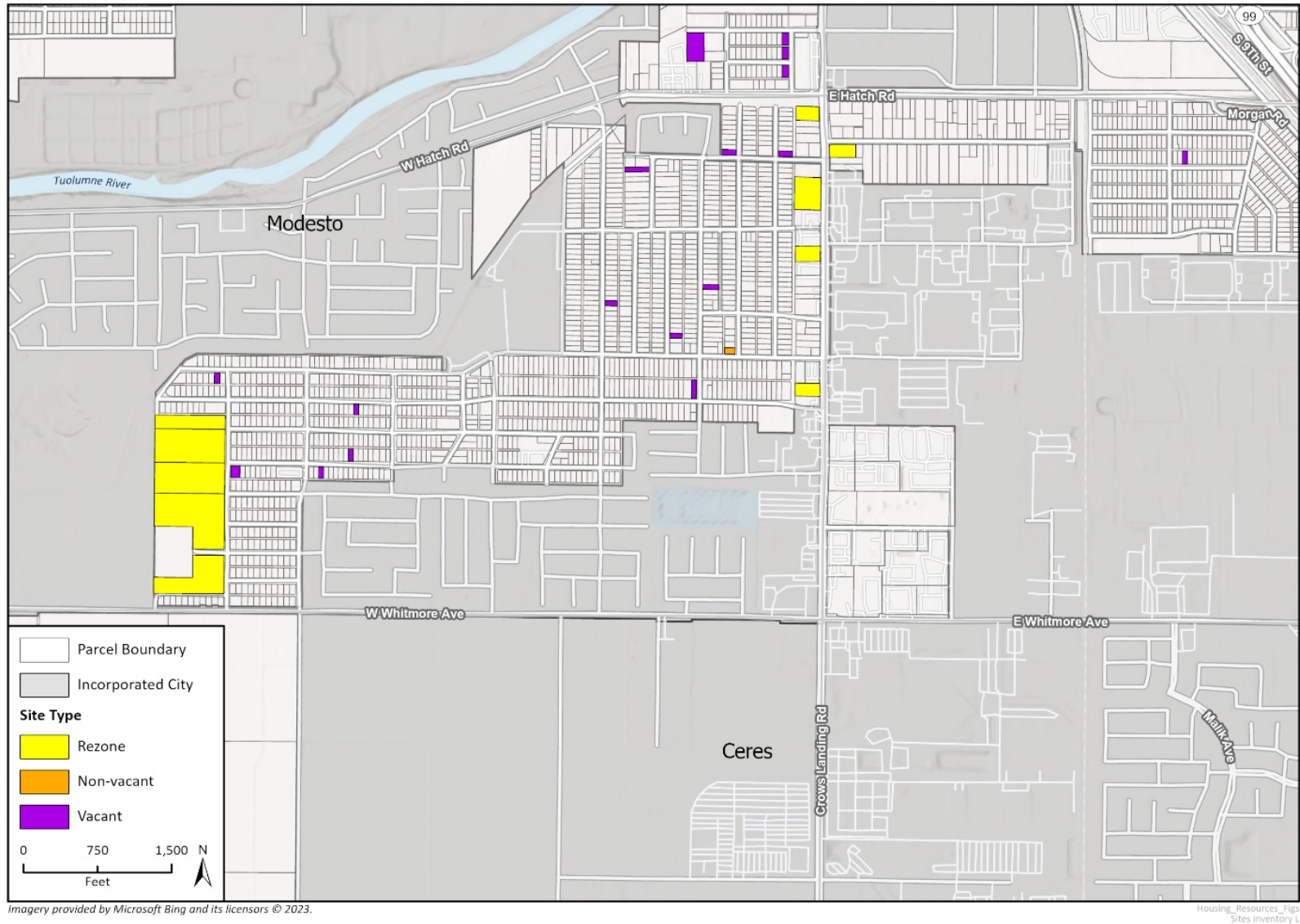


Figure 5-4 Sites Identified in Crow's Landing



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Sites Inventory L

5.4.4 Del Rio

Del Rio is a community located in north-central Stanislaus County, just west of Riverdale. Residential developments are a combination of planned developments and large, Rural Residential-zoned lots. Water is provided by the Del Este/City of Modesto system. There is no community sewer system, but some individual package treatment plants exist. Table 5-11 summarizes available capacity in Del Rio.

Table 5-11 Residential Capacity in Del Rio

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	57	114.35	0	0	129	129
Rezoned Sites	0	0.00	0	0	0	0
Total	57	114.35	0	0	129	129

Due to limited sewer capacity, only rural residential development is proposed in the Del Rio area. The Sites Inventory identified 114.35 acres of vacant land across 57 sites in the Del Rio community, as shown in Figure 5-5 which can accommodate 129 housing units.

5.4.5 Denair

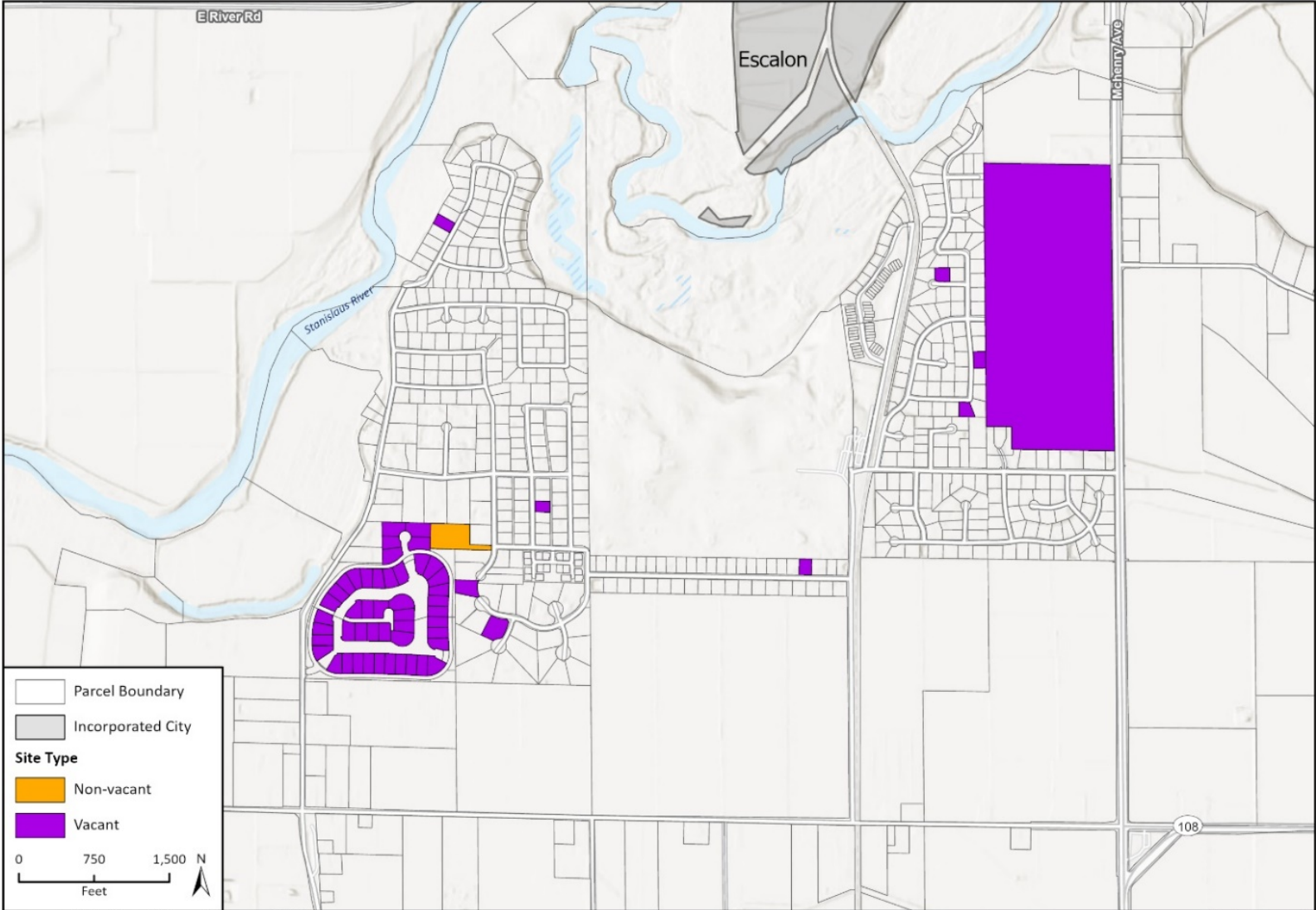
Denair is a small community located east of Turlock. The majority of the community is zoned for residential and general agriculture, with increased densities concentrated around the commercial core along Main Street. All sites identified for the inventory are located within vacant parcels in the rural residential zone. Water and sewer service is provided by the Denair Community Services District. Table 5-12 summarizes available capacity in Denair.

Table 5-12 Residential Capacity in Denair

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	22	28.9	0	38	80	118
Rezoned Sites	6	17.83	235	0	0	235
Total	28	46.73	235	38	80	353

The Sites Inventory identified 28 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 118 housing units. Six properties totalling approximately 18 acres of land in Denair will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 235 housing units. Sites identified in Denair to accommodate a total of 353 housing units are shown in Figure 5-6.

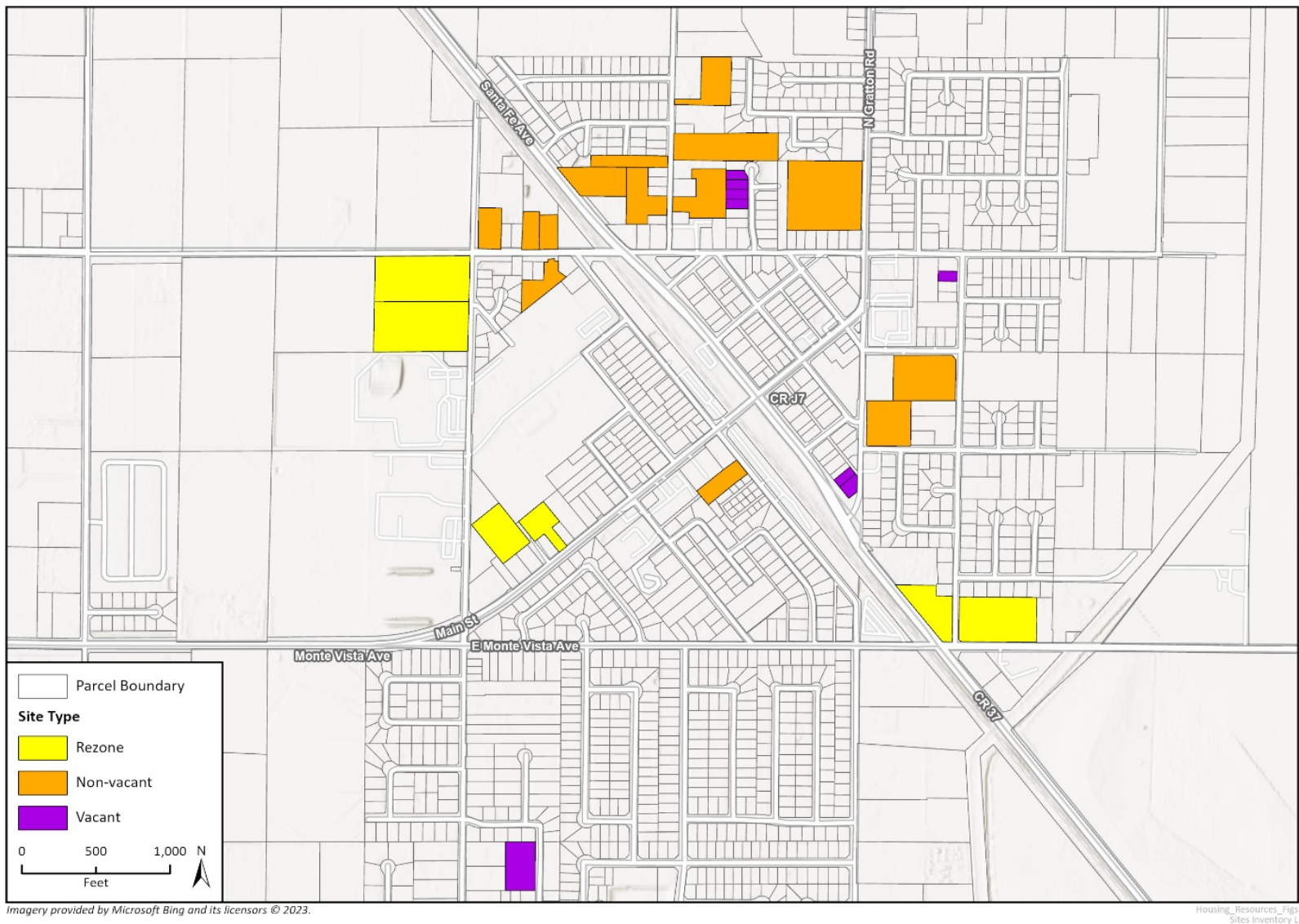
Figure 5-5 Sites Identified in Del Rio



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Figure 5-6 Sites Identified in Denair



5.4.6 Diablo Grande

Diablo Grande is a developing master-planned community in the hills southwest of Patterson. The sites identified in this cycle are in the northeast corner of the community. Household water and sewer utilities are provided by the Western Hills Water District. Table 5-13 summarizes available capacity in Diablo Grande.

Table 5-13 Residential Capacity in Diablo Grande

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	112	155.31	0	0	112	112
Rezoned Sites	0	0.00	0	0	0	0
Total	112	155.31	0	0	112	112

The Sites Inventory identified 112 vacant properties in Diablo Grande suitable for the development of 112 housing units during this housing cycle as shown in Figure 5-7.

5.4.7 Empire

Empire is a community adjacent to the eastern boundary of the City of Modesto. The majority of the community is zoned for residential uses, with commercial uses concentrated along Yosemite Boulevard and Santa Fe Avenue. Water service is provided by the City of Modesto and sewer service by the Empire Sanitary district. Table 5-14 summarizes available capacity in Empire.

Table 5-14 Residential Capacity in Empire

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	13	14.90	56	0	43	99
Rezoned Sites	5	4.77	0	55	0	55
Total	18	19.67	56	55	43	154

The Sites Inventory identified 11 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 67 housing units. An additional two sites zoned Highway Commercial totalling approximately two acres are suitable for the development of 32 housing units. Five parcels along Abbie Street with vacant land suitable for subdivision will be rezoned to allow residential development at 25 dwelling units per acre facilitating an estimated 55 housing units; one of the parcels identified for rezone is owned by the County and is currently vacant. Sites identified in Empire to accommodate a total of 154 housing units are shown in Figure 5-8.

Figure 5-7 Sites Identified in Diablo Grande

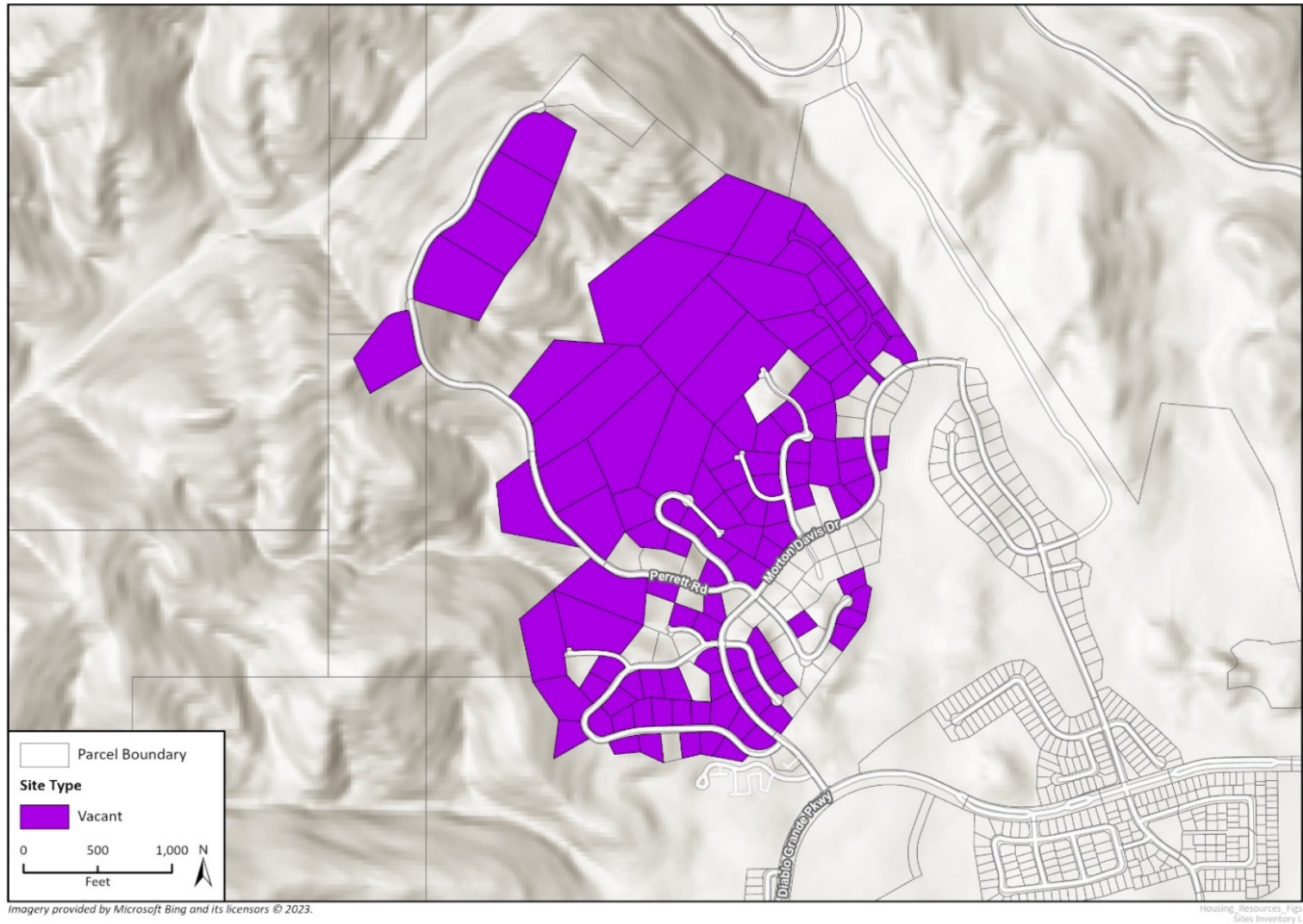
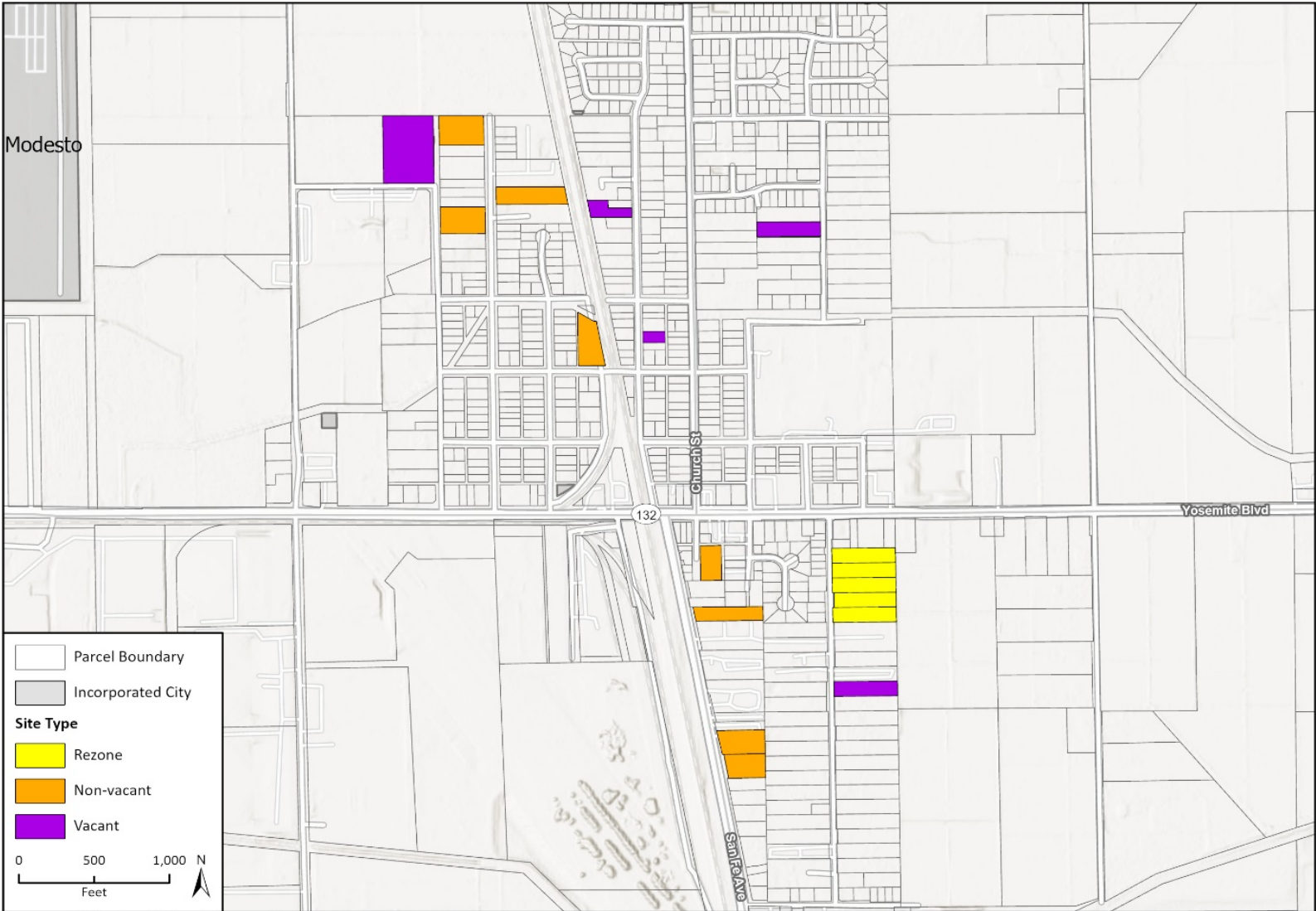


Figure 5-8 Sites Identified in Empire



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5.4.8 Grayson

Grayson is a small community located northeast of the intersection of Highway 33 and Grayson Road, in the western portion of Stanislaus County. The majority of the community is zoned single-family residential. The City of Modesto serves Grayson with household water and the Grayson Community Service District provides sewer service. The City of Modesto is upgrading and expanding the aging potable water infrastructure in Grayson and anticipates completion of capital improvements by the end of 2025. Table 5-15 summarizes available capacity in Grayson.

Table 5-15 Residential Capacity in Grayson

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	4	1.41	0	0	8	8
Rezoned Sites	0	0.00	0	0	0	0
Total	4	1.41	0	0	8	8

Due to the age and limited capacity the existing sewer system for additional multifamily development in Grayson, no sites are proposed for rezoning. The Sites Inventory identified 1.41 acres of vacant land zoned for single-family residential suitable to accommodate eight housing units. Figure 5-9 shows sites identified in Grayson.

5.4.9 Hickman

Hickman is a small community located just south of Waterford. The community is mostly zoned for residential, planned development, or agricultural uses. The City of Waterford provides domestic water service and wastewater is handled by package treatment and individual septic systems. Table 5-16 summarizes available capacity in Hickman.

Table 5-16 Residential Capacity in Hickman

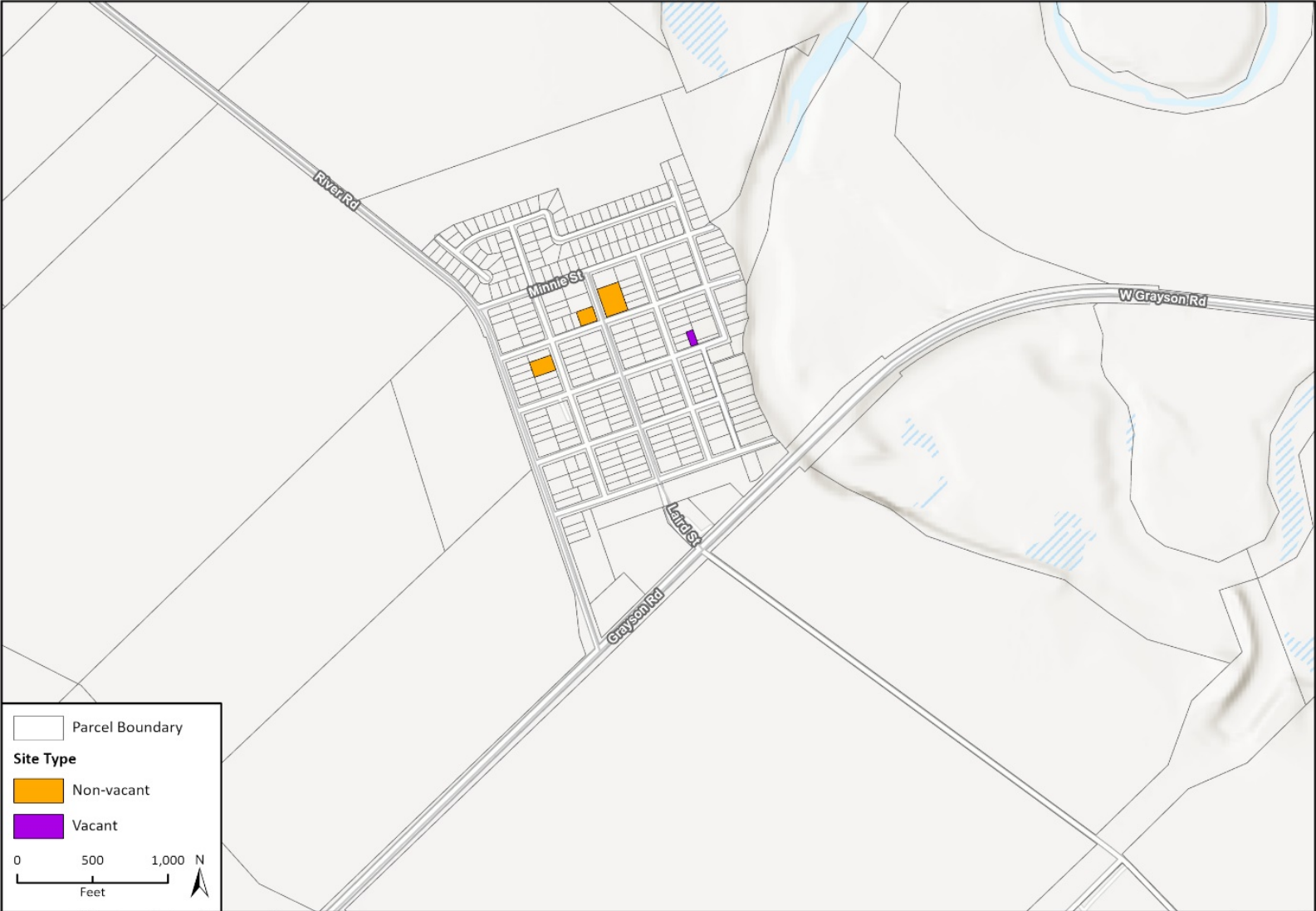
Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	4	6.65	0	0	27	27
Rezoned Sites	0	0.00	0	0	0	0
Total	4	6.65	0	0	27	27

Due to limited sewer capacity, no rezoning is proposed in Hickman. The Sites Inventory identified 6.65 acres across four vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 27 housing units. Figure 5-10 shows sites identified in Hickman.

5.4.10 Keyes

Keyes is a community located east of State Route 99 between Ceres and Turlock. The majority of the community is zoned for single-family residential with a multifamily district along Anna Avenue and Highway Commercial along 7th Street. Keyes has both public water and sewer available through the Keyes Community Services District. Table 5-17 summarizes available capacity in Keyes.

Figure 5-9 Sites Identified in Grayson



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Figure 5-10 Sites Identified in Hickman

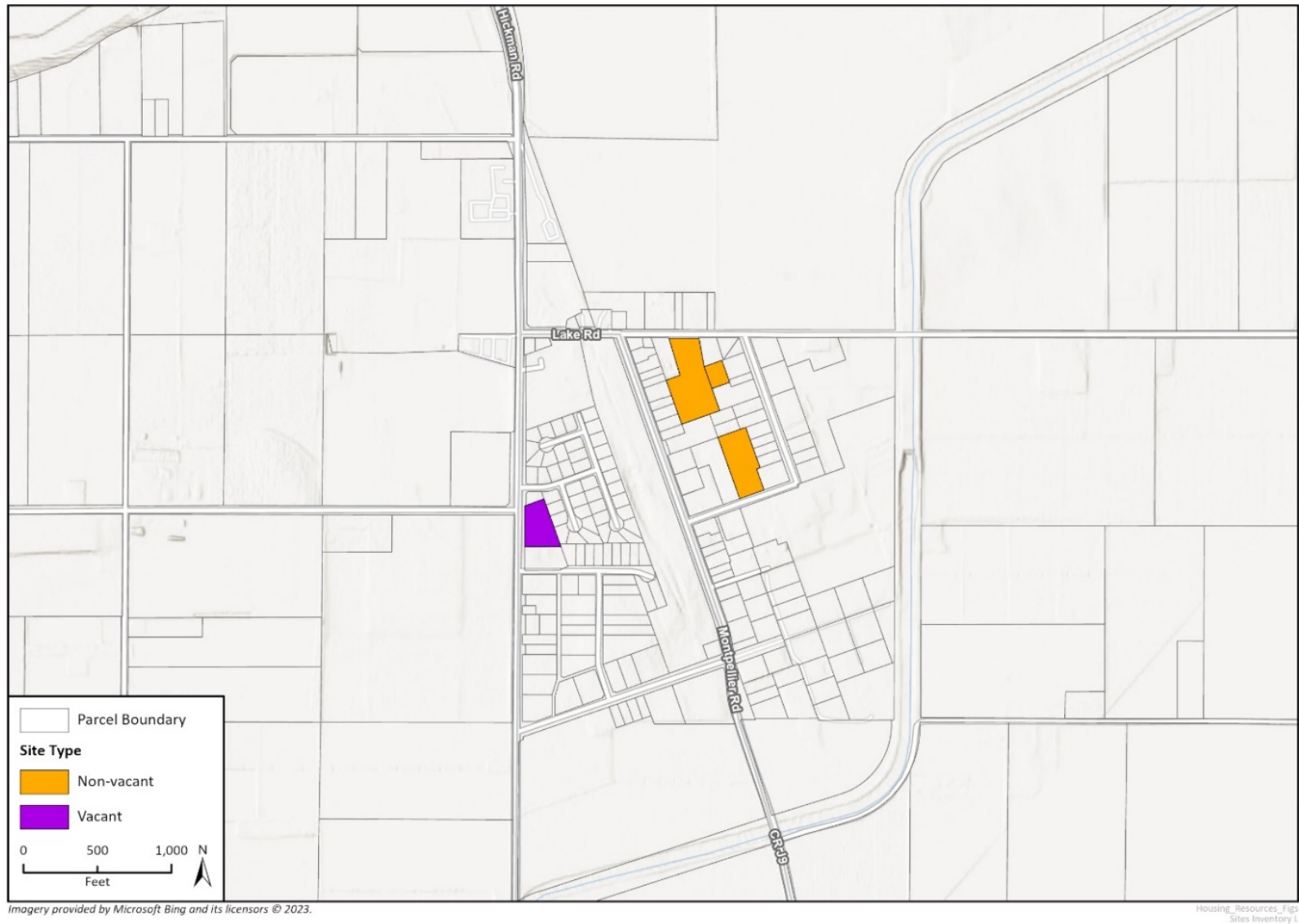


Table 5-17 Residential Capacity in Keyes

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	15	6.47	0	45	14	59
Rezoned Sites	3	4.45	51	11	0	62
Total	20	10.4	51	56	14	121

The Sites Inventory identified 15 vacant and single family home sites with significant undeveloped land suitable for subdivision to accommodate 59 housing units. Three properties totalling approximately four acres of land in Keyes will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 62 housing units. Including the proposed rezoning, an estimated 121 housing units are projected on the sites in Keyes shown in Figure 5-11.

5.4.11 North Ceres

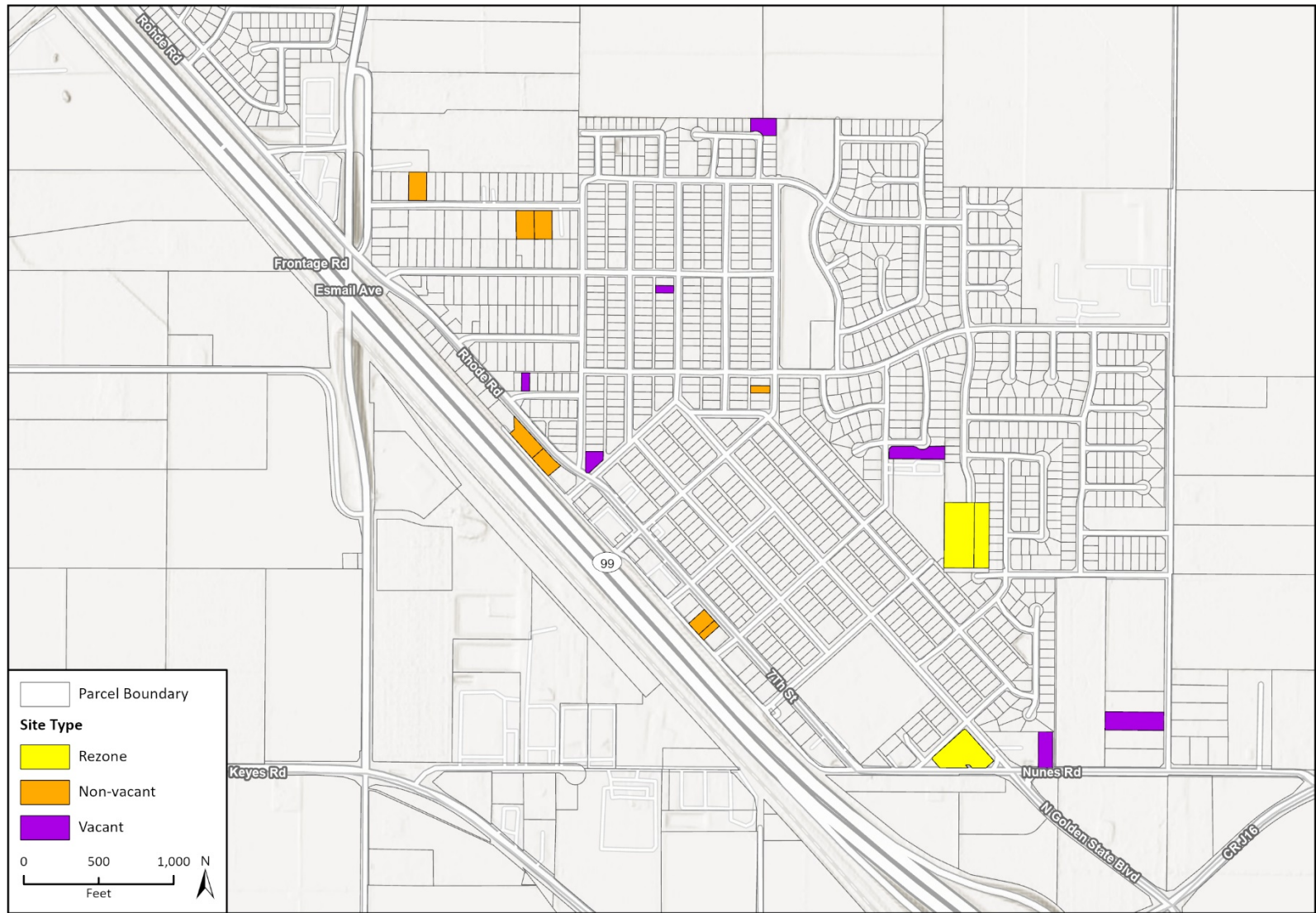
North Ceres is an urbanized area adjacent to the northern boundary of the City of Ceres within the City’s sphere of influence. Water service is provided by both the cities of Modesto and Ceres and sewer service by the City of Ceres. Table 5-18 summarizes available capacity in the North Ceres neighborhood.

Table 5-18 Residential Capacity in North Ceres

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	21	11.61	22	52	19	93
Rezoned Sites	4	7.97	106	8	0	114
Total	25	19.58	128	60	19	207

The Sites Inventory identified 21 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 93 housing units. Many of these sites are small and already zoned for multifamily residential. Four properties totalling approximately 7.97 acres of land in North Ceres will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 114 housing units. Including the proposed rezoning, an estimated 207 housing units are projected on the sites in North Ceres shown in Figure 5-12. North Ceres is an urbanized area adjacent to the southern boundary of the City of Ceres within the City’s sphere of influence. The area is mostly residential with several small agricultural properties. The City of Ceres serves the area with both domestic water and sewer utilities. The area is bordered along the north by the Tuolumne River Regional Park (TRRP); a hundred acres of parkland that runs along seven river miles of the Tuolumne River. The South Ceres area connects to the City of Modesto via the 9th Street Bridge which is a gateway into the city's downtown. The City of Modesto has developed a Downtown Master Plan which includes opportunities for housing as one of its many features. Stanislaus County has been awarded a Caltrans Sustainable Transportation Planning Grant for the 9th Steet Corridor in an effort to address problems with land use compatibility, pedestrian/bike access (lack of sidewalks and bike lanes, and storm water facilities).

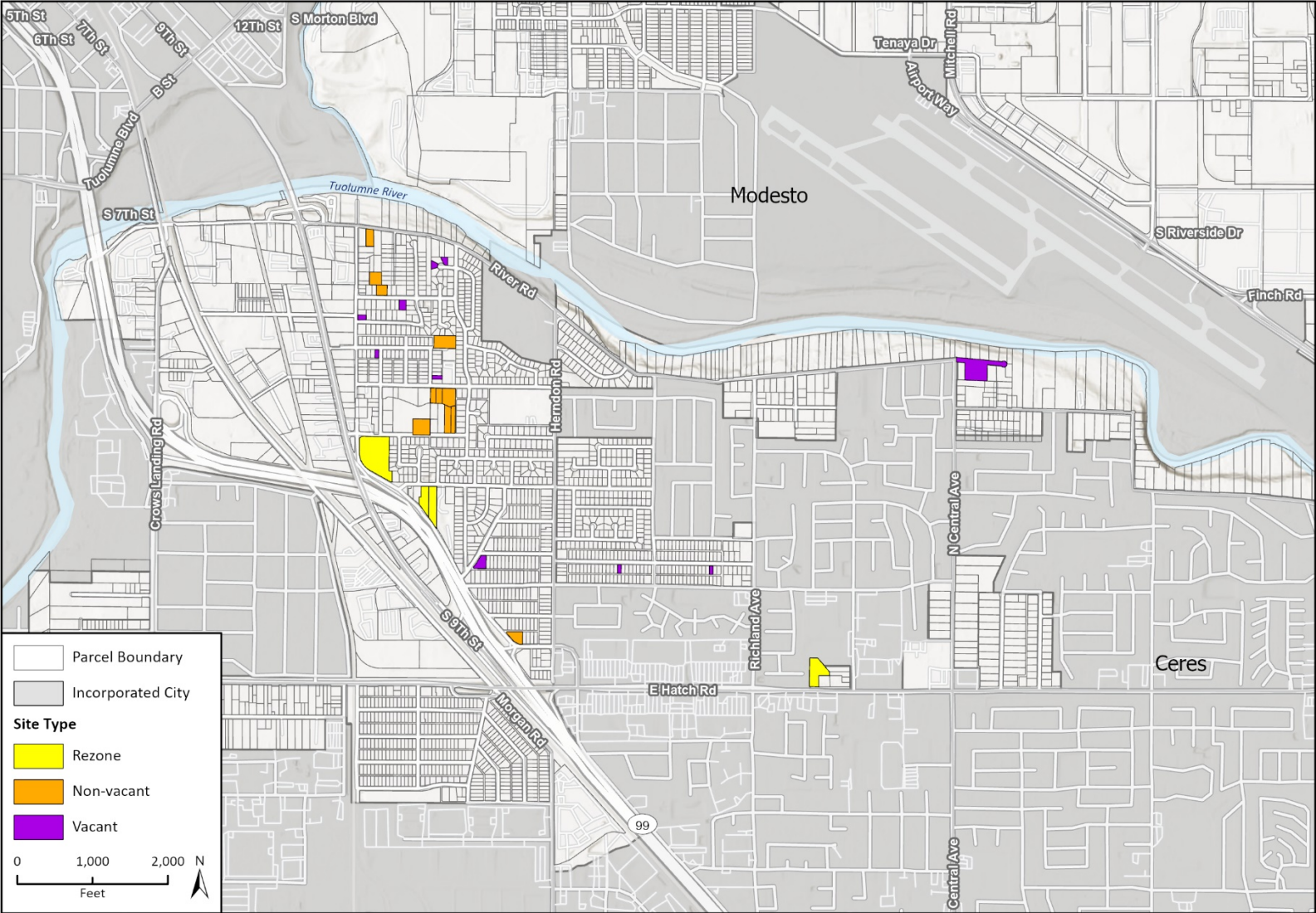
Figure 5-11 Sites Identified in Keys



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Figure 5-12 Sites Identified in North Ceres



5.4.12 East Oakdale

East Oakdale is an urbanized area located east of the City of Oakdale off State Highway 120. The area is mostly rural residential surrounded by agricultural operations. Domestic water services are provided by the Oakdale Irrigation District and wastewater is handled with a combination of private septic and package treatment systems. Table 5-19 summarizes available capacity in East Oakdale.

Table 5-19 Residential Capacity in East Oakdale

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	51	148.23	0	0	168	168
Rezoned Sites	0	0.00	0	0	0	0
Total	51	148.23	0	0	168	168

Due to limited sewer capacity, no rezoning is proposed in East Oakdale. The Sites Inventory identified approximately 148 acres across 51 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate an estimated 168 housing units. Figure 5-13 shows sites identified in East Oakdale.

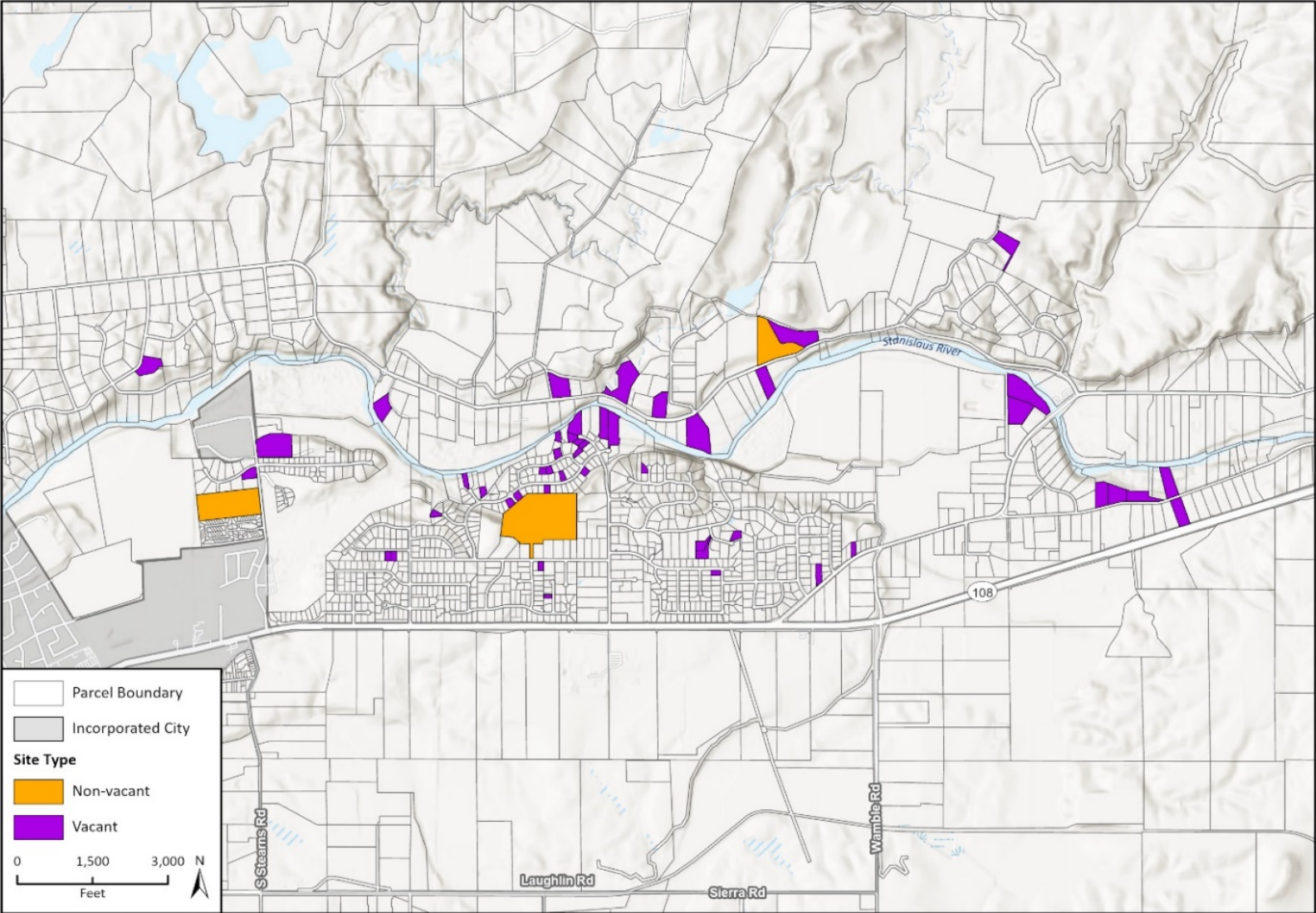
5.4.13 Salida

Salida is a community located north of Modesto. The community has a variety of zoning, with a substantial portion of planned developments allowing for single-family residential development. Domestic water service is provided by the City of Modesto and sewer service by the Salida Sanitary District. While the Salida Community Plan (SCP) allows for the build out of approximately 5,000 dwelling units, the plan was adopted without the environmental analysis required under the California Environmental Quality Act (CEQA). Because significant additional environmental review is required prior to the implementation and build-out of the SCP, the Plan’s capacity has not been included in the Sites Inventory. Table 5-20 summarizes available capacity in Salida outside of the SCP area. Figure 5-14 shows sites identified in Salida.

Table 5-20 Residential Capacity in Salida

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	2	0.60	0	7	0	7
Rezoned Sites	4	3.15	28	16	0	44
Total	6	3.75	28	23	0	51

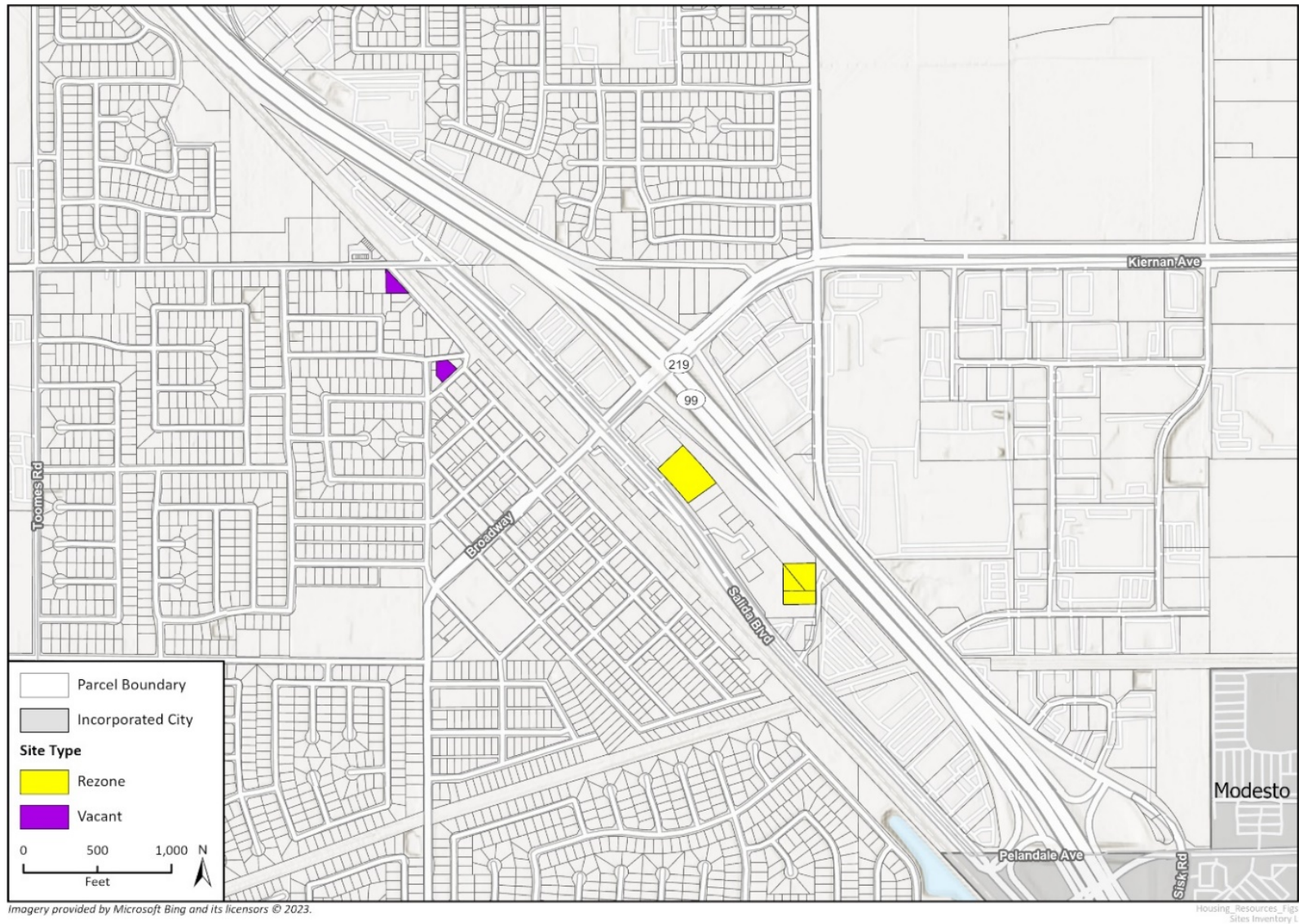
Figure 5-13 Sites Identified in East Oakdale



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Figure 5-14 Sites Identified in Salida



5.4.14 South Ceres

South Ceres is an urbanized area adjacent to the southern boundary of the City of Ceres within the City’s sphere of influence. The area is mostly residential with several small agricultural properties. The City of Ceres serves the area with both domestic water and sewer utilities. The area is bordered along the north by the Tuolumne River Regional Park (TRRP); a hundred acres of parkland that runs along seven river miles of the Tuolumne River. The South Ceres area connects to the City of Modesto via the 9th Street Bridge which is a gateway into the city’s downtown. The City of Modesto has developed a Downtown Master Plan which includes opportunities for housing as one of its many features. Stanislaus County has been awarded a Caltrans Sustainable Transportation Planning Grant for the 9th Steet Corridor in an effort to address problems with land use compatibility, pedestrian/bike access (lack of sidewalks and bike lanes, and storm water facilities). Table 5-21 summarizes available capacity in South Ceres.

Table 5-21 Residential Capacity in South Ceres

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	8	6.56	14	5	12	31
Rezoned Sites	1	4.18	66	0	0	66
Total	5	9.17	80	5	12	97

The Sites Inventory identified eight vacant and underutilized sites with significant undeveloped land suitable for subdivision to accommodate 31 housing units. In addition, one four-acre site in South Ceres will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 66 housing units. Including the proposed rezoning, an estimated 97 housing units are projected on the sites in South Ceres shown in Figure 5-15.

5.4.15 Turlock (Kenwood/Star)

The Kenwood/Star area is a County island within the City of Turlock. The Sites Inventory identified three vacant sites zoned for multifamily residential within the areak. These sites are suitable to accommodate an estimated 10 housing units. Sewer is currently provided by private septic, with some connections to the City of Turlock, but recent American Rescue Plan Act (ARPA) funding is slated to bring municipal sewer service to the area by 2026. Water utilities are provided by the City of Turlock. Figure 5-16 shows sites identified in Turlock. Table 5-22 summarizes available capacity in Turlock.

Table 5-22 Residential Capacity in Turlock

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	3	0.80	0	10	0	10
Rezoned Sites	0	0	0	0	0	0
Total	3	0.80	0	10	0	10

Figure 5-15 Sites Identified in South Ceres

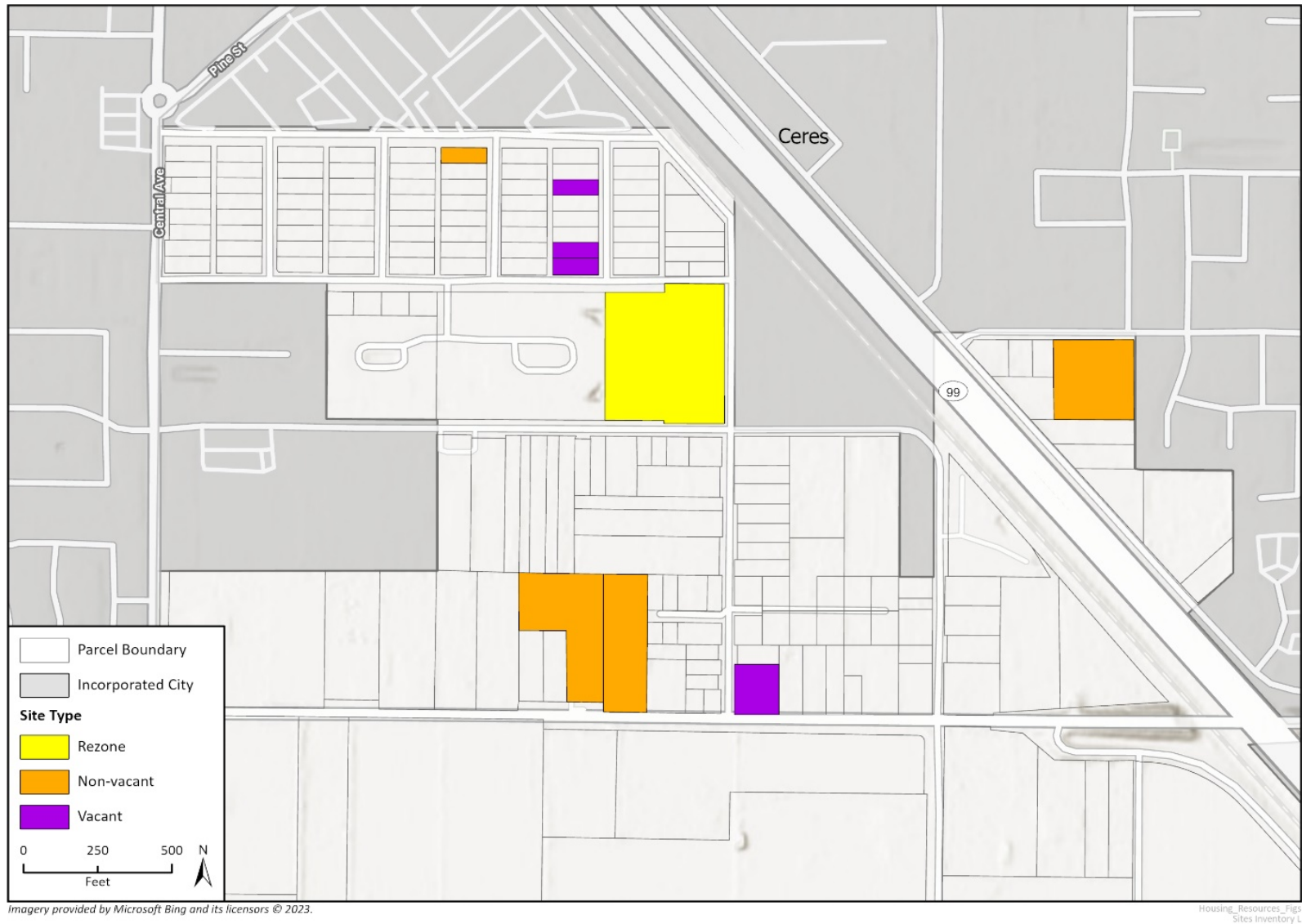
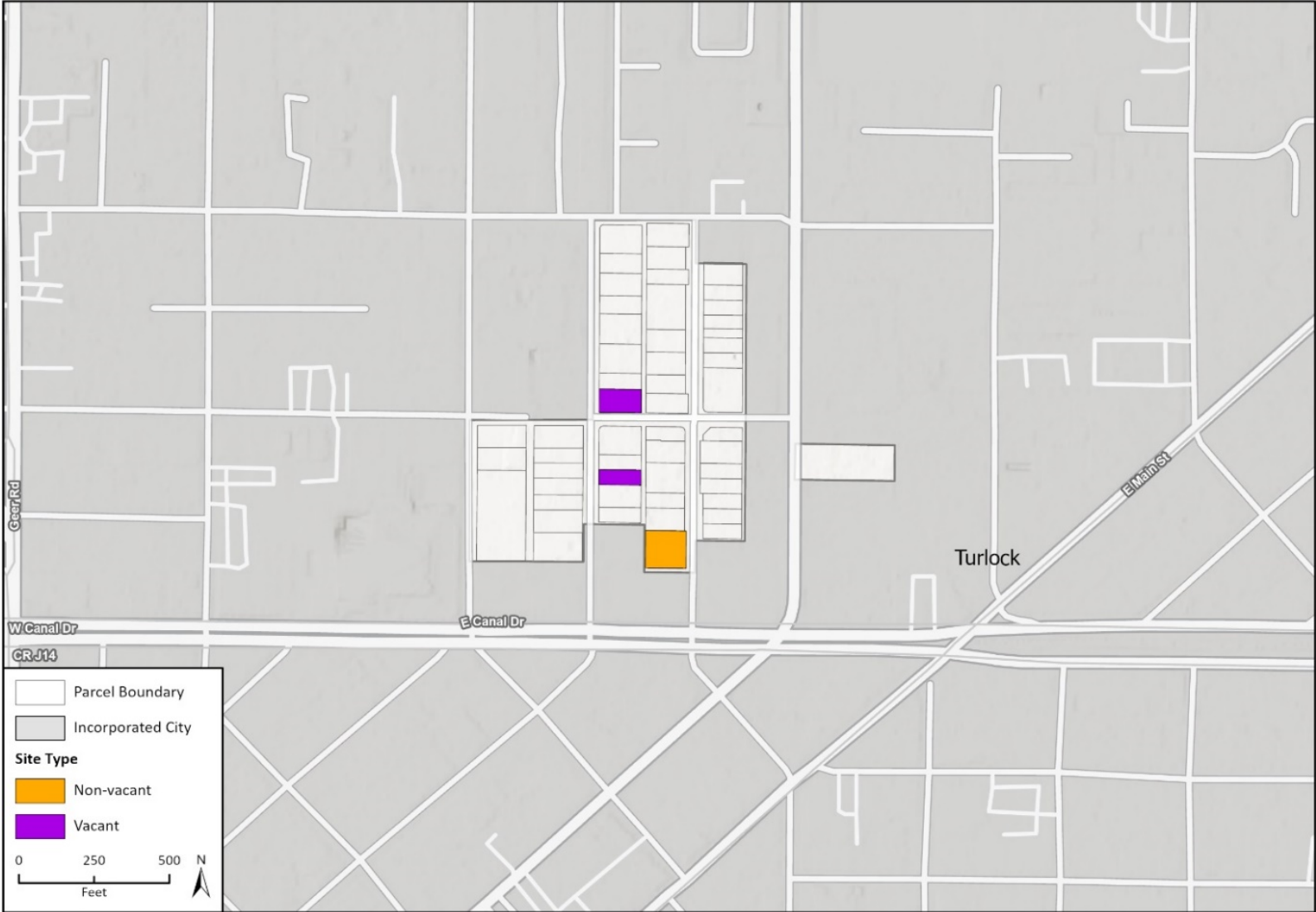


Figure 5-16 Sites Identified in Turlock



5.4.16 Valley Home

Valley Home is a small rural community in northeastern Stanislaus County, located north of Oakdale and west of the Woodward Reservoir. Multifamily housing development in Valley Home is not expected due to the lack of public sewer and water services. As a result, no rezoning is proposed in Valley Home. The Sites Inventory identified four rural residential parcels each suitable for the development of one housing unit. Figure 5-17 shows sites identified in Valley Home. Table 5-23 summarizes available capacity in Valley Home.

Table 5-23 Residential Capacity in Valley Home

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	4	0.61	0	0	4	4
Rezoned Sites	0	0.00	0	0	0	0
Total	4	1.41	0	0	4	4

5.4.17 West Modesto

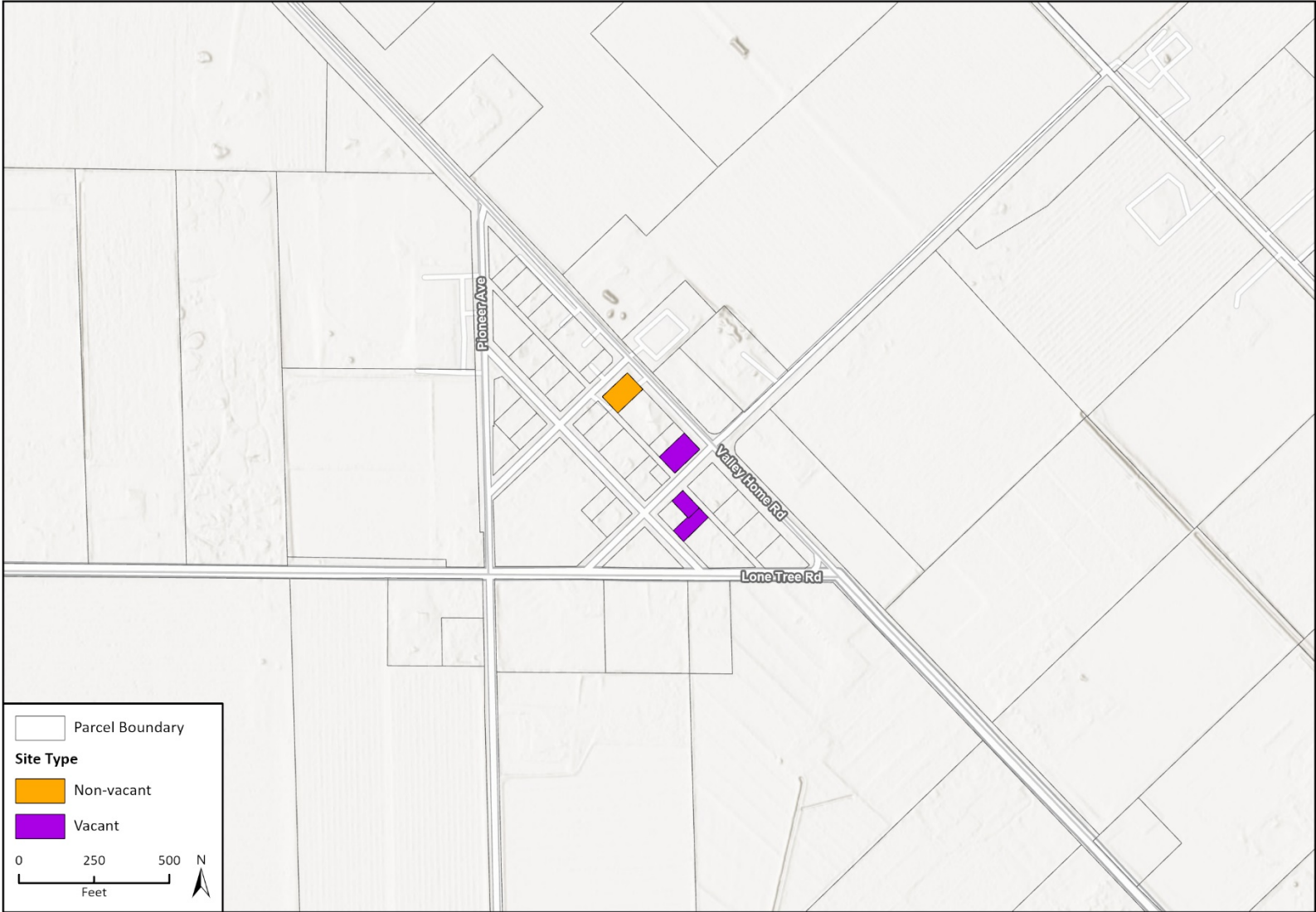
West Modesto is an urbanized area in the City of Modesto’s Sphere of Influence and includes properties zoned for various densities of residential development. The City of Modesto provides domestic water and some sewer service to a portion of the unincorporated area west of downtown shown in Figure 5-18. The County, in partnership with the City of Modesto, is extending sewer service to the Spencer/Marshall and Rouse/Colorado neighborhoods, which are currently served by septic systems, by the end of 2026. The West Modesto area is also the subject of the City of Modesto’s Southwest Modesto Plan which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, infrastructure extending to the unincorporated area. The Plan includes opportunity sites to incorporate higher densities for a variety of housing types. Table 5-24 summarizes available capacity in West Modesto.

Table 5-24 Residential Capacity in West Modesto

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	55	37.56	26	157	67	250
Rezoned Sites	21	26.49	298	94	0	341
Total	76	64.05	324	251	67	577

The Sites Inventory identified approximately 38 acres of vacant land and underutilized properties suitable for subdivision in West Modesto across 55 properties. These sites can accommodate an estimated 250 housing units. A total of approximately 27 acres of land across 22 parcels will be rezoned to accommodate the development of 341 housing units at densities up to 25 dwelling units per acre. Including the proposed rezoning, an estimated 591 housing units are projected in West Modesto.

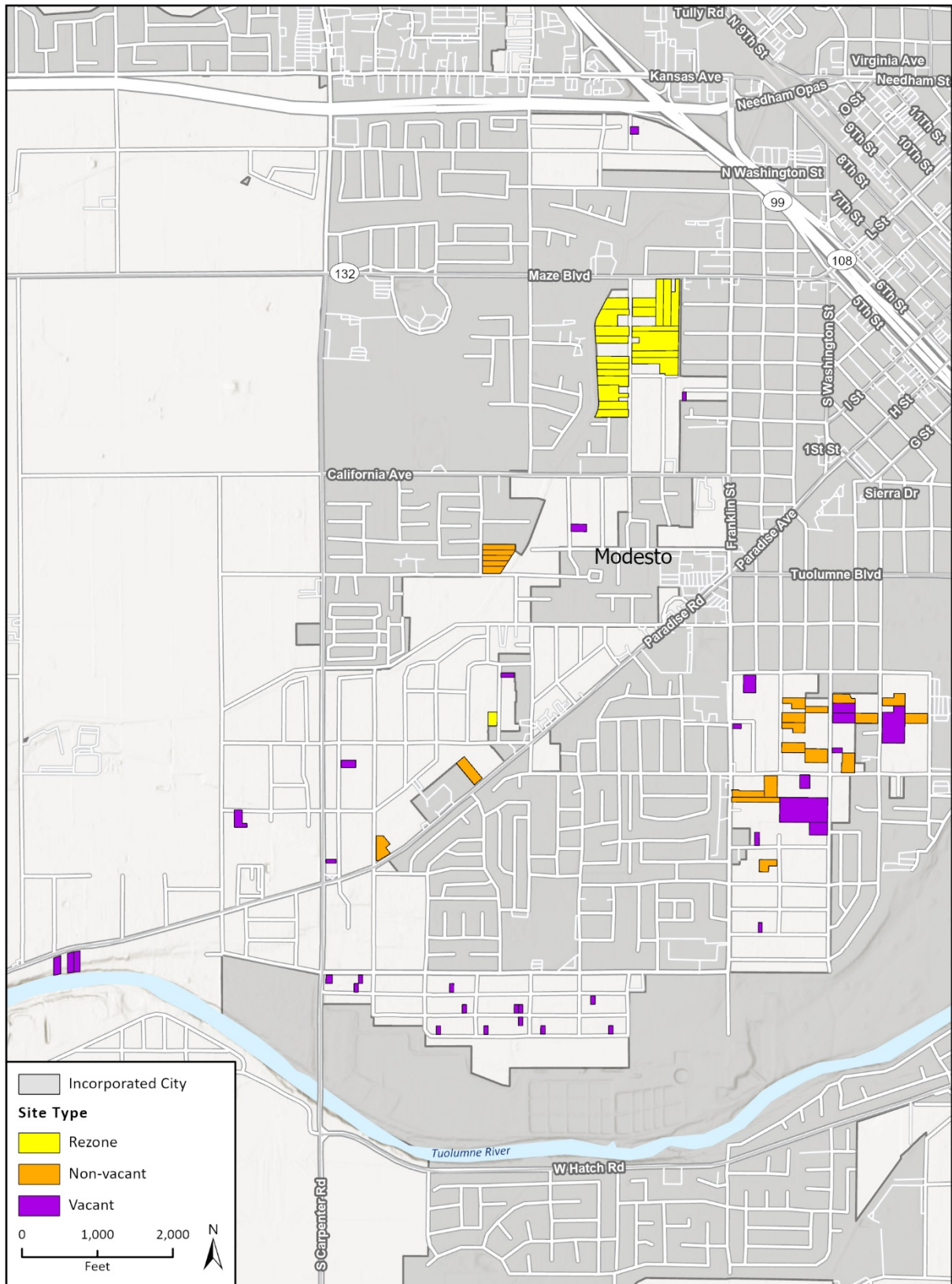
Figure 5-17 Sites Identified in Valley Home



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Housing_Resources_Figs
Sites Inventory L

Figure 5-18 Sites Identified in West Modesto



Imagery provided by Microsoft Bing and its licensors © 2023.

Housing Resources - Fig 5-18
Sites Inventory P

5.5 Sites Inventory Methodology and Justification

Land suitable for residential development must be appropriate and available for residential use in the planning period. Characteristics such as the availability of infrastructure, physical features (e.g., susceptibility to flooding, slope instability, or erosion) and location (proximity to transit, job centers, and community services) should also be considered when evaluating the suitability of sites. The following section details the criteria and process by which suitable sites were identified for inclusion in the inventory, the suitability of many of these sites for affordable housing, the suitability of non-vacant sites for new housing development, and the ability of mixed-use zoning to support residential development.

5.5.1 Suitable Sites for Affordable Housing

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. State law has established "default" density standards for the purpose of estimating potential units by income range. In the unincorporated areas of Stanislaus County, HCD has established a density standard of 20 or more units per acre (primarily for higher density multi-family developments) that would facilitate the development of housing in the low- and very low-income category.

In addition to default density standards, the California Legislature established size requirements for parcels intended to support the development of lower-income units. Government Code Section 65583.2 establishes that sites between 0.5 and 10 acres in size zoned for residential development at greater than 20 units per acre are suitable for lower-income projects. Very small parcels, even when zoned for high densities, may not facilitate the scale of development required to access competitive funding resources. Conversely, typically lower-resource affordable housing developers may be unable to finance the scale of project necessitated by very large parcels.

State law also requires jurisdictions to demonstrate sufficient infrastructure availability (either currently or in the near future) for any sites identified for housing affordable to lower-income households. This is due to the increased development costs associated with the permitting and development of on-site wells and/or wastewater treatment systems, making residential development infeasible. As is typical of other Central Valley counties, municipal infrastructure in Stanislaus County is usually only available on sites within or adjacent to established communities. Similarly, HCD guidance on identifying sites suitable for housing affordable to lower-income households recommends these sites be identified in areas close to other amenities such as grocery stores, transit stops, personal services, employment opportunities, and healthcare providers. In an agricultural county like Stanislaus, these amenities are typically available within established communities.

The location of housing opportunity sites for each income category were chosen to facilitate the development of mixed-income neighborhoods and to increase the availability of affordable housing in proximity to transit, retail, and other services. While many of the opportunity sites identified for the development of housing affordable to lower-income households are in low-resource areas according to TCAC, this is due to the lack of centralized water and sewer services, transit, employment opportunities, and other services available in higher-resource areas. Furthermore, as discussed in Chapter 4: Housing Constraints, Measure E limits the conversion of land from agriculture to residential use in higher-resource areas of the county. While the majority of low- and very low-income units projected in the sites inventory are in low-resource census tracts, these tracts have higher access to goods and services, due to their proximity to urban services in the City of Modesto and City of Ceres.

5.5.2 Suitability of Non-vacant Sites

To identify potential sites for additional development, geospatial data was used to identify vacant and nonvacant but underutilized properties within the unincorporated areas of the county. Nonvacant parcels were chosen as sites likely to be redeveloped during the planning period based on the following factors:

- **Improvement-to-Land Value Ratio.** A parcel's improvement-to-land value ratio can be used to identify properties that are likely to be redeveloped during the planning period. A ratio of less than 1.0 indicates that the real estate market values the land itself more highly than any structure on that land. These underutilized parcels represent opportunities for property owners and developers to invest in improvements that increase the overall value of the property. It should be noted that the improvement-to-land value ratio of a property does not necessarily consider development standards or environmental constraints that may impact the feasibility of redevelopment on the site. Of 103 non-vacant sites identified, approximately 90 percent have an improvement-to-land value ratio of less than 1.0 and accommodate 90 percent of units projected on non-vacant properties.
- **Existing Use Versus Zoned Use.** A comparison of a site's current use to the use for which it is zoned can also help identify underutilized properties. This factor is especially useful when trends demonstrate that some uses are more likely to be redeveloped than others. For example, a parcel currently occupied by a parking lot which is zoned for high-density housing or high-intensity commercial development is also an opportunity to convert the site to a higher-value use.
- **Lot Coverage.** Lot coverage is the percentage of parcel area occupied by enclosed structures. Surface parking, shade structures, carports and similar structures are not typically counted towards the total lot coverage. Low lot coverage indicates underutilization of a site, especially when a particular site is surrounded by higher-intensity development.

County staff conducted visual screenings of sites and removed any site that appeared unlikely to be redeveloped such as popular commercial uses, institutional uses, and open space. The inventory includes larger sites occupied by single-family homes with significant undeveloped land. Where these residences are expected to remain, the estimated capacity of the site was reduced based on the amount of land available for development while maintaining existing structures.

The housing element must analyze the extent to which existing uses may impede additional residential development. Limited infrastructure in the unincorporated areas of the county as well as the constraints imposed by Measure E, obligate the County to rely on the redevelopment of non-vacant sites to accommodate a portion of its total RHNA. The County relies on nonvacant sites to accommodate approximately 51 percent of its total RHNA and approximately 68 percent of its RHNA for lower-income households. Table 5-25 shows the existing uses of the non-vacant parcels identified on the Sites Inventory. Sites were identified with uses that could be converted to a higher value use, and thus have a higher potential for redevelopment. Regional development trends indicate that sites with significant excess land and older commercial uses are most likely to be redeveloped with residential projects. As a result of this analysis, the County determined that existing uses would not impede conversion to additional residential development.

Existing Uses

Table 5-26 shows the recent redevelopment trends on non-vacant parcels throughout Stanislaus County. All parcels identified in the Sites Inventory where existing uses are expected to redevelop

have an ILV of less than 1.0. Additionally, all sites identified for lower-income units meet state size and density requirements to facilitate the development of lower-income units.

Table 5-25 Existing Uses of Inventory Sites

Existing Use	Number of Sites	Gross Acreage	Available Acreage	Number of Units
Single-family with Extra Land	83	156.66	134.84	998
Multi-family with Extra Land	11	10.57	6.5	89
Public Facility with Extra Land	1	2.94	1.38	5
Church with Extra Land	2	7.35	4.75	18
Vehicle Storage	2	19.7	1.97	26
Commercial	5	5.36	5.36	85
Hotel/Motel	1	1.75	1.75	28
Mobile Home Park	1	4.40	4.40	70
Vacant	352	450.55	449.70	1,242
Total	458	641.63	610.73	2,561

Because of the County’s rural land use pattern, the largest opportunity for housing development in the county is the development of the vacant portions of properties with one single-family home. The recent redevelopment of eight similar sites throughout the county has shown that these types of rural residential properties are likely to redevelop with larger scale residential projects. For example, the Keyes 19, and Gold Star Investments projects in Keyes developed 62 and 28 units respectively on lots formerly occupied by a single-family home. Similarly, the Lazares Subdivision and the WPD Homes projects in Denair developed 69 and 10 units respectively on sites occupied by single family homes. An existing unit will remain on the site after construction of the WPD Homes project.

The recent Archway Commons and 1612 Sisk Road project demonstrate the feasibility of redevelopment of service commercial and hotel/motel uses. The Archway Commons project developed 150 units of affordable housing in two phases on the site of a former commercial trucking yard. The 1612 Sisk Road project is in the process of converting a former hotel to 150 units of supportive housing.

In addition to the specific housing project discussed above, two ongoing planning efforts by the City of Modesto have identified West Modesto and the Crows Landing Road corridor for public investment to support the development of multi-family housing.

The Modesto Housing Plan is a document that explores ways to expand housing choice while responding to shifting household needs, growing demand for walkable neighborhoods, and the need for housing at different price points. The Housing Plan provides planning and policy guidance to remove barriers and boost housing production. The Housing Plan includes “test-fit” middle housing design and feasibility case studies on several commercial corridors throughout the City of Modesto including Crows Landing Road. The Study found that, with small adjustments to the development standards applicable on corridor adjacent sites, numerous housing typologies are feasible.

Similarly, the Southwest Modesto Plan, in the early phases development as of the adoption of this housing element, intends to serve as a blueprint for future development, with guidance on land use, economic development, transportation, infrastructure, and other issues for the Southwest Modesto

Plan Area. The plan area includes opportunity sites along the Crows Landing Corridor and is intended to facilitate the revitalization and housing development throughout Southwest Modesto.

These projects and the projects listed in Table 5-26 demonstrate the feasibility of redevelopment of properties with large vacant portions.

Table 5-26 Redevelopment of Non-Vacant Sites

Locality	Project Name	Previous Use	Zoning	Site Acreage	Total Units
Keyes	Keyes 19 North	Two Single Family Dwellings with Extra Land	R-1	13.20	62
Keyes	Gold Star Investments	Single Family with Extra Land	R-1	9.54	28
Denair	WPD Homes, Inc.	Single Family with Extra Land	P-D (356)	1.32	10
Keyes	Orange Grove Estates	Single Family with Extra Land	R-1	2.11	8
Denair	Elmwood Estates	Single Family with Extra Land	Rezoned to P-D	4.82	17
Denair	Isaaco Estates	Two Single Family Dwellings with Extra Land	R-A	3.10	11
Keyes	Keyes 19 South	Single Family with Extra Land	R-1	6.70	26
Denair	Lazares Companies Subdivision	Single Family with Extra Land	R-A	18.20	69
Modesto	Archway Commons Phase I	Industrial	P-D	4.50	76
Modesto	1612 Sisk Road.	Motel	C-3	6.72	150

5.5.3 Suitability of Publicly Owned Sites

The Sites Inventory identifies three sites that are owned by the County itself or by a local community service district listed in Table 5-27. These sites are vacant or have a significant portion of vacant land and are considered highly developable.

The County will maintain a list of publicly owned properties with potential for residential development. Additionally, the County will prioritize the development of these parcels for affordable housing development, particularly for extremely low-income households and residents with special housing needs, such as seniors and persons with disabilities.

The County will follow all requirements of the Surplus Land Act, Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5, including holding a public hearing designating the properties as “surplus properties” under California law. County staff will reach out to developers and pursue projects that include housing for affordable housing development consistent with density and income assumptions made on the Sites Inventory.

Table 5-27 Publicly Owned Sites

APN	Community	Ownership	Zoning District	Existing Use	Maximum Allowable Density (du/acre)	Realistic Capacity (units)
024024038	Denair	Denair CSD	R-A	Public Facility with Extra Land	5.4	5
045066059	Keyes	County	R-1	Vacant	8.7	4
133017006	Empire	County	R-3*	Vacant	25	15
Total Units						24

*Site is currently zoned R-A and will be rezoned to R-3. The capacity listed is based on the allowable density of the R-3 district.

5.6 Availability of Infrastructure and Services

There are many community service districts and water districts in the county's unincorporated areas which provide water and sewer services. Each unincorporated community and sewer or water system is unique in terms of size, geography, topography, water sources, age and condition of lines and equipment, rate structure, and status of long-range planning. Some sewer or water systems in the unincorporated county have existing treatment facilities or water supplies that are adequate to serve growth at buildout of the General Plan, while some do not. It is not always feasible for water and sewer service providers to plan, finance, and build facilities with substantial unused capacity, so new development is subject to impact fees that help fund improvements.

Infrastructure issues in the unincorporated area include limitations on water supply and sewer capacity and water quality issues. Increased residential development can exceed the current capacity of existing infrastructure. Since the previous Housing Element, the County has successfully provided upgrades and new connections to infrastructure in several areas identified for residential development, which will be continued into this Housing Element.

Since infrastructure projects are costly, the County is committed to utilizing its allocation of federal Community Development Block Grant funding to support priority sewer infrastructure development and to look for other sources of funding available for infrastructure development. Infrastructure projects that have occurred since the previous Housing Element adoption include the completion of sewer infrastructure projects in the Airport and Parklawn neighborhood and the partial completion of sewer infrastructure in the Spencer/Marshal neighborhood. The Spencer/Marshal neighborhood sewer project is part of the West Modesto Sewer Infrastructure (WMSI) Project. The WMSI Project also includes the Beverly/Waverly and Rouse/Colorado neighborhoods. Environmental for the entire WMSI project has been completed and the County is working to use American Recovery Act funds to complete the sewer infrastructure for the Rouse/Colorado neighborhood. The County is actively seeking State Water Board funding to assist with the sewer infrastructure development in the Spencer/Marshal and Rouse/Colorado neighborhoods. Additional sewer expansion projects in the Rouse/Colorado and Spencer/Marshall neighborhoods are underway and will be completed by the end of 2026. With the completion of these sewer projects, the City of Modesto will serve all sites identified in the City's Sphere of influence with adequate water and sewer service. Program 3-9 of the Housing Plan will prioritize and expansion of services for affordable housing projects.

The following is a description of each of the community service districts that serve unincorporated areas.

5.6.1 Community Service Districts

Crows Landing CSD (water): Area of 124 acres; serves 500 residential customers. While there are several vacant lots in the community, significant population growth is not anticipated in this area. The water distribution system needs improvement and system upgrades, as the water system is currently at capacity. The CSD has limited financial resources to address deficiencies.

Denair CSD (sewer and water): Area of 674 acres (1,056 including the sphere of influence); serves 4,873 people. The CSD has four groundwater wells, five lift stations, and an above-ground steel water tank that serves customers within existing boundaries. For any future growth, additional groundwater wells and/or pipelines will be necessary. The CSD has purchased sewer capacity from the City of Turlock to serve future development, but due to limited infrastructure and resources, no significant population growth is expected. Current demand can be met with existing facilities, financial resources, and infrastructure. Significant intensification of development within district boundaries may require expansion of water and sewer infrastructure.

Grayson CSD (sewer): Area of 100 acres (104 including the sphere of influence); serves 240 residential and one commercial customer. The District received a Proposition 1 Small Community Wastewater Grant from the California State Water Resources Control Board on November 18, 2016. The \$500,000 planning grant was intended to assist with the development of the Grayson CSD Wastewater Treatment Facility Planning Project. The project will consolidate the wastewater treatment of Westley and Grayson. A new secondary wastewater treatment facility will be constructed in the current location of the Grayson Wastewater Treatment Plant, which will collect and treat the combined wastewater flow from both communities. The wastewater treatment facility will be abandoned, and Westley and Grayson will only have one facility to operate and maintain. Due to limited capacity, no significant population growth is anticipated. The CSD has capacity to serve its existing service area, with necessary financial resources to fund existing service levels.

Keyes CSD (water and sewer): Area of 478 acres (793 acres including the sphere of influence). This CSD serves approximately 1,350 customers providing sewer, water, and lighting services. The CSD can serve residents in the existing service area and the identified parcels with water and sewer service with no infrastructure needs or deficiencies. Lift station improvements, force main modifications, additional water wells, and additional wastewater disposal capacity and/or alternative sources of domestic water are needed before major growth outside of the existing service area can occur.

5.6.2 Sanitary Districts

Empire Sanitary District (sewer): Area of 427 acres (428 acres including the sphere of influence); serves 1,488 residential and commercial customers. The City of Modesto accepts sewage from the ESD's sewer collection system. No significant population growth is anticipated in the near future due to limited infrastructure and resources.

Salida Sanitary District (sewer): Area of 1,485 acres (1,530 acres including the sphere of influence). This district serves 4,038 residential customers and 253 commercial, industrial, and other uses. The sanitary district currently has adequate capacity to provide the necessary sewer services to customers, with three tanks operating below capacity levels. The sanitary district has enough capacity to provide the necessary sewer services to customers, with three tanks operating below capacity levels.

5.7 Environmental Constraints

As noted in Chapter 2, *Housing Constraints*, environmental constraints to housing development in Stanislaus County include the risk of wildfire in the Diablo Grande area and flooding in southern portions of West Modesto. These constraints are addressed in the 2035 County General Plan, adopted in 2016, with policies to reduce or mitigate risks for development.

The County also certified an Environmental Impact Report (EIR) for the 2035 General Plan that evaluated the potential impacts of future developments. Environmental clearance for future development projects may tier from the EIR, thereby expediting the approval process. Mitigation measures are set forth in the EIR and include measures to minimize impacts associated with potential flooding and other environmental constraints.

Out of the sites identified in the Sites Inventory, those located in Diablo Grande and West Modesto are subject to environmental constraints. Diablo Grande is a community in the mountainous region of Stanislaus County, where 112 sites identified for above moderate-income housing lie in high fire hazard severity zones. No sites identified for housing development affordable to lower- or moderate-income households are in areas with elevated risk of wildfire. These sites are zoned for low-density, estate-type residential development according to the Diablo Grande Specific Plan.

In West Modesto, sites located in the southern portion of the community are located within the USA flood hazard area due to their proximity to the Tuolumne River. Of the sites identified in West Modesto, 12 sites are located within the one percent annual flood hazard zone and six are located in the 0.2 percent annual flood hazard zone. No sites with known flood risk will be rezoned for higher-density residential.

5.8 Financial Resources for Affordable Housing

5.8.1 Existing Financial Resources

Stanislaus County is the lead entity of the Stanislaus Urban County, which is a HUD-designated entitlement jurisdiction for the purpose of receiving Community Development Block Grant (CDBG) and Emergency Solution Grant (ESG) funds. The Stanislaus Urban County consists of the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford, and the unincorporated area of the county. As of July 1, 2023, Stanislaus County took over administration of Home Investment Partnership Program (HOME) funds as the lead entity of the new Stanislaus HOME Consortium, which comprises Stanislaus Urban County and the City of Turlock.

As the Stanislaus Urban County lead, Stanislaus County also receives a non-completive allocation of the State's Permanent Local Housing Allocation (PLHA) funding. The following is an overview of the County's use of State and Federal funding sources.

Community Development Block Grant (CDBG)

The CDBG program is administered by HUD and provides funding to jurisdictions to undertake community development and housing projects.

Projects proposed by the jurisdictions must meet the objectives and eligibility criteria of CDBG legislation. The primary CDBG objective is the development of viable urban communities, including decent housing, a suitable living environment, and expanded economic opportunity, principally for

persons of low- and moderate-income. Each activity must meet one of the three following national objectives:

- Benefit to low-and moderate-income families;
- Aid in the prevention of elimination of slums or blight; or
- Meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community.

Stanislaus County uses CDBG funds to carry out a variety of public services and to provide for sewer infrastructure needed to preserve existing housing and allow for new housing opportunities .

Emergency Solutions Grant (ESG)

The ESG program is administered by HUD intended to supplement state, local, and private efforts to improve the quality and quantity of emergency shelters and transitional facilities for people experiencing homelessness. Part of this program looks to provide case management and financial assistance to prevent homelessness, as well as permanently re-house people experiencing homelessness. The ESG program provides funding to:

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate these shelters;
- Provide essential services to shelter residents;
- Rapidly re-house homeless individuals and families; and
- Prevent families/individuals from becoming homeless.

Stanislaus County utilizes ESG funds to assist homeless individuals find housing through temporary or permanent shelter, or with housing search, placement, and rental assistance.

Home Investment Partnership Program (HOME)

The HOME program is administered by HUD, and it provides federal funds for the development and rehabilitation of affordable rental and ownership housing for households with incomes not exceeding 80 percent of area median income. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations. HOME funds can be used for activities that promote affordable rental housing and homeownership by low-income households, including:

- Building acquisition
- New construction and reconstruction
- Moderate or substantial rehabilitation
- Homebuyer assistance
- Rental assistance
- Security deposit assistance

Stanislaus County will utilize HOME funds to assist with the development of affordable housing and rehabilitation of existing housing.

Permanent Local Housing Allocation (PLHA)

Administered at the state level by HCD, PLHA provides funding to local governments in California for housing-related projects and programs that assist in addressing the unmet housing needs of their local communities. Stanislaus County has established a five-year plan to use PLHA funds for the predevelopment, development, acquisition, rehabilitation, and preservation of multifamily rental housing and permanent supportive housing. The County will also make PLHA funding available to assist with the development and preservation of Accessory Dwelling Units (ADUs) affordable to extremely low-, very low-, low-, or moderate-income households and to provide fiscal incentives to cities approving affordable housing projects.¹ All PLHA funding will be available to the Urban County areas of Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, and the unincorporated areas of the County.

5.8.2 Potential Financial Resources

The County is actively exploring a diverse range of funding avenues to facilitate the development of affordable housing. One notable approach involves the establishment of Enhanced Infrastructure Financing Districts (EIFDs). EIFDs are a type of Tax Increment Financing (TIF) district that cities and counties may form to help fund economic development projects. TIF works by freezing the property tax revenues that flow from a designated project area to the city, county, and other taxing entities at the “base level” in the current year. Additional tax revenue in future years (the “increment”) is diverted into a separate pool of money, which can be used either to pay for improvements directly or to pay back bonds issued against the anticipated TIF revenue.

Several legislative measures have passed in the years following the dissolution of tax-increment financing under the auspices of California Redevelopment Law that modified SB 628 and EIFD requirements: Assembly Bill 733 (2017) allows for EIFDs to fund climate change adaptation projects, including but not limited to projects that address conditions that impact public health (such as decreased air and water quality, temperatures higher than average, etc.) and extreme weather events (such as sea level rise, heat waves, wildfires, etc.); Senate Bill 1145 (2018) allows EIFDs to also fund infrastructure maintenance costs; Assembly Bill 116 (2019) allows for EIFDs to issue bonds without public vote however does increase public engagement requirements.

Additionally, the County is pursuing resources provided by the Community Development Financial Institutions Fund (CDFI Fund). This federal program offers financial support and technical assistance to community development financial institutions that play a pivotal role in driving economic growth and development, particularly in underserved areas. Collaborating with CDFIs enables the County to access additional capital for housing projects, especially those aimed at addressing the needs of low-income individuals and families.

5.9 Administrative Resources

This section describes administrative resources available to support housing development. These include building, code enforcement, housing programs, and partnerships with non-profit organizations that help Stanislaus County achieve the goals and objectives of this Housing Element update.

¹ https://www.stancounty.com/planning/pdf/plha_5year_plan.pdf

5.9.1 County of Stanislaus

The County plays a crucial role in facilitating housing production by providing strategic planning, regulatory frameworks, and financial support to encourage the development of new housing units. This involves zoning regulations that allocate land for residential use, streamlining permitting processes to expedite construction, and incentivizing developers through various mechanisms. Additionally, the County identifies suitable sites for housing development, coordinates infrastructure improvements, and collaborates with public and private partners to secure funding for projects. Multiple County departments play a role in these efforts including the Planning and Community Development Department which oversees Building Permit Services, Community Development Services, and Planning Services, and the Department of Environmental Resources which oversees the inspection and permitting of new wells and septic systems.

The Building Permit Services provides administration of building permits in compliance with minimum standards set forth within the California Code of Regulations Title 24 for new and existing buildings being altered, repaired and/or constructed; oversees the County's One-Stop-Shop permitting process; assigns new addresses; provides floodplain administration for construction permits; calculates and collects Public Facilities Fees for the County; and administers the Dangerous Building Abatement program.

The Community Development Services provide administration of federal entitlement, state, and local funding supporting various community development, public service, emergency solutions, and housing programs. Funding includes CDBG, ESG, and PLHA programs identified above.

The Planning Services provides administration of the County's General Plan; Zoning and Subdivision Ordinances; Stanislaus County Planning Commission and Airport Land Use Commission; land use entitlement permitting; environmental reviews/compliance; and the local administration of the Surface Mining and Reclamation Act and California Land Conservation Act (Williamson Act).

5.9.2 San Joaquin Valley Regional Planning Agencies Policy Council

The Stanislaus County Council of Governments (StanCOG) is one of the agencies of the San Joaquin Valley Regional Planning Agencies Policy Council. The Policy Council provides a platform for the Valley to connect on regional issues that impact each agency such as transportation, air quality, and advocacy efforts. The council works to identify successful action items implemented by regional planning agencies that can result in a vision for the entire Valley.

5.9.3 Non-Profit Organizations

The local housing authority, non-profit housing developers, and service providers are a critical resource for accomplishing the goals and objectives of this Housing Element. This can be accomplished through private/public partnerships.

5.10 Opportunities for Energy Conservation

Stanislaus County, through the Sustainable Communities Planning Grant funds and in partnership with various cities, developed the Stanislaus Regional Sustainability Toolbox (RST). This toolbox includes multiple planning tools to achieve greenhouse gas reductions in the region. Some of the planning

tools include City of Hughson Model Climate Action Plan, City of Newman Non-motorized Transportation Plan, City of Patterson Sustainable Development Ordinance, and a County-wide Greenhouse Gas Emissions Inventory.

According to the US Department of Energy, in 2015, 55 percent of energy was used for heating and cooling. Water heating, appliances, electronics, and lighting accounted for the remaining 45 percent of total consumption. These numbers hold true in Stanislaus County considering the average temperatures range from 38 degrees in the winter to over 100 degrees in the summer, with residents spending an average of \$126 per month on electricity². As energy consumption runs high, there are many opportunities for active and passive energy conservation such as: the design of new housing and the rehabilitation of existing homes, the choice of appliances, the use of construction materials, and the location and types of landscaping materials. Reducing home energy costs and conservation play a part in housing affordability. Examples of energy conservation policies and standards include but are not limited to the following:

- Conservation and Open Space Element Policy Thirty-Two: New construction by the County shall meet or exceed code requirements for energy conservation.
- Section 20.52.250 of the Stanislaus County Subdivision Ordinance, requiring that to the extent feasible, subdivisions are designed to provide passive or natural heating and cooling opportunities.

Additionally, Program 1-39 of the Housing Plan directs the County to provide resources and support to developers engaging with sustainable design and energy-efficient building construction methods.

²<https://www.energysage.com/local-data/electricity-cost/ca/stanislaus-county/#:~:text=The%20average%20electric%20rates%20in,the%20course%20of%20the%20year.>

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6 Housing Plan

The Housing Plan identifies the County’s housing goals, policies, and programs. The overall strategy is to present a balanced and diverse array of programs which address the main issue areas of construction, preservation of affordable housing, conservation of 3-8 naturally occurring affordable housing, rehabilitation, and administration. Stanislaus County’s Housing Plan includes the six following themes:

- **Conserving and Improving Existing Housing Stock.** Conserving and improving the existing housing stock helps maintain investment in the community and keeps existing housing affordable. Because a majority of the housing stock in the unincorporated areas of the County is more than 30 years old, rehabilitation efforts are important to preserve housing stock. Over 72 percent of the housing units in unincorporated Stanislaus County are older than 30 years versus 65 percent in incorporated Stanislaus County. While the age of housing, by itself, does not necessarily equate with poor housing conditions, there is greater potential for housing problems in older structures. Preventing problems from occurring and addressing them when they do occur protects the safety and welfare of residents and assists in meeting housing needs throughout Stanislaus County, particularly for the most vulnerable residents. Additionally, supporting the maintenance and preservation of the existing housing stock, including mobile home parks, stabilizes neighborhoods and protects against displacement, particularly for low-income residents. The County will focus its efforts on rehabilitation, code enforcement, preserving existing affordable units, and implementing anti-displacement policies and programs to take a proactive approach to conserving and improving the current housing stock.
- **Assisting in the Development of Affordable Housing.** Providing affordable housing is essential for a healthy community. Seeking funding from varied sources increases the opportunities for the development of affordable housing units. The County works with both non-profit and for-profit developers in the production of affordable for-sale and rental housing. Recognizing a variety of housing needs, the County supports the development of affordable housing opportunities ranging from creation of rental housing that meets the needs of extremely low-, very low-, and low-income households to creation of ownership housing for lower and moderate-income households to improve housing stability, help instill a pride of ownership, and increase wealth building opportunities.
- **Housing For Persons with Special Needs.** The County of Stanislaus is a diverse community with people of all backgrounds, lifestyles, family types, and income levels. Many residents also have special housing needs. State law requires the housing element to address the needs of specific special needs groups, including seniors, persons with disabilities, large families with children, female-headed households, and individuals experiencing homelessness. Meeting the needs of these residents requires a broad range of strategies for housing and other services.
- **Equal Housing Opportunities for All Persons.** The County recognizes the importance of extending equal housing opportunities for all persons, regardless of race, religion, sex, family status, marital status, ancestry, national origin, color, age, physical or mental disability, sexual orientation, source of income, or any other arbitrary factor.
- **Providing Adequate Sites.** Pursuant to State law, the County is obligated to address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. Removing constraints on housing development can help address housing needs in the County by expediting construction and lowering development costs.

The County's Housing Plan is applicable to activities in and serving the unincorporated areas of Stanislaus County and commitments to use, or to explore the use of, entitlement funds received by the County, in partnership with other jurisdictions, are for the County's portion of the awarded funding, unless otherwise noted.

Goal 1: Conserve and enhance the existing housing opportunities, viable housing stock, and neighborhoods in Stanislaus County.

Policies

- 1A Support Safe and Livable Housing.** The County shall support code enforcement efforts in responding to complaints and ensuring that existing housing meets adopted code requirements that set forth acceptable health and safety standards for residential units, as the County is required to enforce existing housing and building codes.
- 1B Support the Preservation of Existing Single-Family Housing Occupied by Lower-income Households.** The County shall preserve the existing single-family housing stock occupied by lower-income households by providing rehabilitation assistance for single-family, owner-occupied units, including manufactured homes and mobile homes.
- 1C Provide Residential Rehabilitation Opportunities.** The County will partner with public and private agencies to provide funding support for residential rehabilitation programs to improve housing quality and conditions, ensuring the safety, habitability, and enhanced living standards for lower-income households.
- 1D Preserve At-Risk Units and Naturally Occurring Affordable Housing.** The County will seek to avoid the loss of publicly assisted affordable housing units and/or housing units occupied by lower-income households and the resulting displacement of low-income residents by providing funds, as available, to nonprofit developers to be used for the acquisition of subsidized housing developments at risk of converting to market rate units.
- 1E Code Compliance.** The County shall continue to encourage the rehabilitation of substandard residential properties by homeowners and landlords by responding to citizen complaints regarding potential code violations and referring residents to appropriate resources, as the County is required to enforce existing housing and building codes.

Programs

Program 1-1 Home Rehabilitation Program

The County will continue to assist income-eligible households with housing rehabilitation needs. The program is designed to respond to housing needs such as leaking roofs, fire damage, accessibility retrofits, and other health and safety related housing needs. This program is further intended to promote independence through accessibility modifications to eligible applicants with disabilities. The County will continue to partner with local nonprofit organizations in efforts to assist in single-family rehabilitation in the unincorporated county using state, federal and Redevelopment Successor Housing Agency funds for deferred or below market-rate interest loans, or grants. Priority will be given to improvements that correct health and safety issues, and to provide accessibility modifications for people who have disabilities.

Actions	Objective and Timeframe
Action 1-1a: Provide housing rehabilitation assistance for owner-occupied households, including mobile homes, with a focus on vulnerable and lower-income households including seniors on a fixed income and persons with disabilities. (Environmental Justice)	Provide grants and/or loans for home repairs of at least three owner-occupied housing units per year for a total of 24 housing units during the planning period.
Action 1-1b: Provide property owners of substandard or deteriorating housing with rehabilitation program resources to assist with repairs and rehabilitation. (Environmental Justice)	Make program materials (e.g., fact sheets, brochures) available on a case-by-case basis upon property owner inquiry or at the time of code enforcement action.
Action 1-1c: Continue using rehabilitation funds for the testing and mitigation of housing units for lead-based paint pursuant to the Lead-Based Paint Hazard Reduction Act of 1992.	Continue to offer lead-based paint removal as part of the rehabilitation program.
Action 1-1d: Partner with the Stanislaus County Health Services Agency to develop and disseminate educational materials and programs focused on lead risk in housing to children, especially in Disadvantaged Communities. (Environmental Justice)	Develop materials to be disseminated together with rehabilitation program materials and to service providers by June 2025.
Action 1-1e: Work with local nonprofit organizations and community groups to expand and spread awareness on home and accessibility rehabilitation programs.	Provide program materials (e.g., fact sheets, brochures) to nonprofit organizations and community groups by June 2025 and on an ongoing basis, and County staff attend at least one public event per year to publicize rehabilitation programs.
Action 1-1f: Explore modifying housing rehabilitation program polices to assist lower-income homeowners in acquiring the necessary upgrades required to protect against indoor air pollution and poor drinking water quality associated with pesticide pollution. (Environmental Justice)	Determine feasibility for use of rehabilitation funds for air and water filtration by June 2025.
Action 1-1g: Explore use of Permanent Local Housing Allocation (PLHA) funds for rental housing rehabilitation.	Determine feasibility of using County's allocation of PLHA funds for rental housing rehabilitation by June 2025.
Implements the Following Policies	1B, 1C, 1D
Responsible Agency	County Planning & Community Development County Health Services Agency
Funding Sources	Federal and State Funding

Program 1-2 Residential Compliance Program

Continue to enforce federal, state, and local laws such as the International Property Maintenance Code, California Housing Code (under Division 13 of the CA Health and Safety Code), Title 24 California Building Standards Code, and Title 16 – Buildings and Construction of the County Code to ensure minimum health and safety standards in residential units.

Actions	Objective and Timeframe
Action 1-2a: Amend the County Code, if determined necessary, to comply with Section 17970.5 of the California Health and Safety Code requiring that upon a rental tenant complaint, a) a mandatory inspection be conducted and b) specific actions identified that can be taken to mitigate any hazards present. (Environmental Justice)	If determined necessary, amend the County Code by January 2025.
Implements the Following Policies	1A, 1E
Responsible Agency	County Planning & Community Development County Department of Environmental Resources
Funding Sources	Department Revenues

Program 1-3 Building and Design Standards for Energy Efficiency

The County will continue to promote the reduction of energy usage and costs through building and design practices that meet the minimum standards of Title 24 and encourage conservation of energy resources and utilization of alternative energy resources.

Actions	Objective and Timeframe
Action 1-3a: Emphasize the incorporation of active and passive energy conservation features such as energy-efficient appliances; heating/cooling systems; windows, doors, and skylights; building materials; building/window orientation; and use of landscape materials in new and rehabilitated County-assisted affordable housing.	Amend funding policies to encourage or require energy-efficient features in assisted dwelling units by June 2025.
Action 1-3b: Partner with other agencies and energy providers who disperse information and/or offer programs and incentives to increase public awareness and utilization of energy conservation practices.	Identify partners and establish partnership opportunities to disperse information by December 2025.
Implements the Following Policies	1A
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 1-4 Preservation of At-Risk Affordable Housing

This program is intended to support the preservation or acquisition of restricted affordable units and unrestricted affordable units that could potentially convert to market-rate units during the planning period. There are no deed-restricted at-risk units in the unincorporated county at this time. The County would undertake actions in this program that apply to at-risk units if the County does have any affordable at-risk units prior to the end of the planning period.

Actions	Objective and Timeframe
Action 1-4a: Monitor the status of any deed-restricted affordable units built in the unincorporated county. If any at-risk units are identified, the County will complete actions 1-4b to 1-4f.	Annually.
Action 1-4b: Reach out to property owners of at-risk units to inquire about their plans for the property and assess the risk of loss of affordable housing units.	Send correspondence to property owner three years prior to termination of regulatory controls. Objective is to ascertain risk of loss of affordable units and identify if the County has resources to preserve the units.
Action 1-4c: Inform property owners of their obligation to comply with noticing requirements stipulated under state law to ensure that qualified non-profit entities from the State’s qualified entities list are informed of the opportunity to acquire the affordable property and that tenants are informed about their rights and potential resources. If the property was built before July 1, 1979, inform property owner that rent increase limits will apply post conversion to market rate.	Send notice to property owner three years prior to potential project conversion. Provide follow-up with contacts one year and six months prior to conversion if property owner fails to comply. Objective is to ensure qualified non-profit entities are notified of acquisition opportunities and to ensure tenants are aware of the impending changes.
Action 1-4d: Proactively engage and provide technical assistance to potential purchasers of at-risk units, including nonprofits, developers, and tenants of potentially converting affordable properties. Assist with funding as feasible and/or support funding application for acquisition and/or rehabilitation of units.	Establish a list of established and potential housing purchasers within three months of identification of at-risk units. Contact potential purchasers of at-risk units to discuss affordability preservation at least one year prior to the expiration of at-risk units.
Action 1-4e: Work with property owners of at-risk units to provide information to the tenants of these units regarding tenant’s rights and conversion procedures pursuant to AB 1521 (2017, Bloom) or other legal remedies.	At least 18 months prior to the expiration of the regulatory agreement for at-risk units, ensure that tenants understand their rights to remain in the units and that they receive information and referrals regarding available relocation assistance and resources.
Action 1-4f: Support qualified affordable housing developers that acquire and convert naturally occurring affordable housing to restricted affordable housing in applications for state or federal funding application requirements. The County may choose not to support projects that pose a high risk of displacement of existing tenants.	On a case-by-case basis.
Implements the Following Policies	1B, 1C, 1D
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Goal 2: Assist in the development of housing affordable to lower- and moderate-income households.

Policies

- 2A Homeownership Housing:** The County shall encourage the development of ownership housing and assist tenants to become homeowners to increase owner-occupancy rate within the parameters of federal and state housing laws.
- 2B Provide Incentives for Affordable Housing:** The County shall promote the use of density bonuses and waive or reduce park, transportation, and other impact fees to facilitate the development of new housing for extremely low-, very low-, and low-income households.
- 2C Integration of Affordable Housing:** The County shall encourage a mix of affordability levels in residential projects and encourage the dispersal of such units to achieve greater integration of affordable housing throughout the community.
- 2D Create Access to Capital:** The County shall support efforts to create access to capital needed to increase housing development and improve housing affordability in Stanislaus County. The County shall identify new funding sources and strategies to support affordable housing.
- 2E Regional Housing Needs Allocation (RHNA):** The County will support future StanCOG Regional Housing Need Allocation efforts that equitably recognize the County's contribution to housing developments within city limits through the reduction in County Impact Fees for affordable housing development and for partnerships to develop affordable housing using County funds within the incorporated cities.
- 2F RHNA Transfer:** The County shall seek to negotiate agreements with any city proposing to annex land utilized by the County to meet its RHNA obligations to transfer a share of the StanCOG RHNA from the unincorporated area to the annexing city.

Programs

Program 2-1 Affordable Housing Development Assistance

The County is committed to developing and monitoring affordable housing and will continue to prioritize housing for very low- and low-income households in the development of additional housing stock. The County will continue to support the development of housing appropriate for extremely low-income households and seek new funding opportunities and partnerships. The County will work to prioritize households at the extremely low-income level and seek new funding opportunities and partnerships to improve housing conditions amongst the vulnerable and lower-income communities.

Actions	Objective and Timeframe
Action 2-1a: Partner with qualified housing developers to identify affordable housing development opportunities with emphasis on promoting housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, low-income, and/or persons with disabilities.	Meet with at least one developer annually to provide information on housing incentives and programs to support the entitlement of at least 100 housing units affordable to extremely low-, very low-, and low-income households in the county during the planning period.
Action 2-1b: Monitor availability of state and federal funding and support developers with their applications for incentives and funding programs that provide financial assistance to develop affordable housing for special needs populations.	Annually, review proposed development budgets and schedules for County-funded affordable housing projects to identify the need for County support with funding applications. Upon request, provide technical assistance for non-County-funded affordable housing development projects.
Action 2-1c: Continue to assist developers, faith-based and nonprofit organizations, or other qualified private sector interests for the application and development of projects for federal and state financing. Assisting with entitlements, site identification, fee reductions when appropriate, and density bonuses.	Assist in supporting the development of at least 100 subsidized very low- and low-income income units over the eight-year planning period. Subject to funding availability, provide development subsidy for at least three affordable housing developments. Prioritize subsidies for financing for rental housing units affordable to lower-income households and households with special needs.
Action 2-1d: Ensure a streamlined process for affordable housing development that provides one-stop access to staff from the various county agencies involved in the development process.	Maintain current information on the development process, potential fee reductions, and density bonus on the County’s website.
Action 2-1e: Work with the Stanislaus Urban County partners to close out the Neighborhood Stabilization Program (NSP) in a manner that retains the County’s portion of the funds for supporting housing, including infrastructure needed to support the preservation of existing housing and the development of new housing opportunities.	Ongoing.
Action 2-1f: Continue to support partnerships with Community Development Corporations as a means of attracting different sources of funding and creating innovative funding models to support housing development.	Meet with at least one Community Development Corporation annually.
Action 2-1g: Explore options to facilitate the necessary environmental review needed to allow for housing development within the Salida Community Plan.	Identify options and determine viability by June 2026.
Action 2-1h: Explore feasibility of extending Public Facility Fee waivers or deferrals to affordable farmworker housing.	Explore feasibility by June 2025 and, if necessary, complete feasibility analysis by January 2026.
Implements the Following Policies	2B, 2C, 2D, 2E
Responsible Agency	County Planning & Community Development County Behavioral Health and Recovery Services Chief Executives Office
Funding Sources	Federal, State, and Local Funding

Program 2-2 Density Bonus

The County offers residential density bonuses to encourage affordable housing development. The County can grant a number of incentives in exchange for a portion of a development being dedicated for units affordable to lower- and moderate-income households, senior or student housing, or installing on-site childcare. These incentives include density bonuses over the otherwise allowed maximum density, reductions in parking standards, regulatory concessions, and waivers to development standards. These units must remain affordable for a period of no less than 55 years and each project must enter into an agreement with the County and be monitored by the Housing Services Division to ensure compliance.

The County’s current Density Bonus was adopted in 2015 and must be updated to be consistent with State law.

Actions	Objective and Timeframe
Action 2-2a: Update the Density Bonus Ordinance to bring it into compliance with State law and remove the requirement for Planning Commission approval of Density Bonus applications.	Adopt updated Density Bonus Ordinance by December 2025
Action 2-2b: As part of Density Bonus Ordinance update, discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond state law is appropriate for the County. This is specific to projects that already meet the State required percentage of affordable units at the time of application.	Meet with four qualified housing developers by June 2025, prior to updating the Density Bonus Ordinance.
Action 2-2c: Ensure that housing developers are informed about the County’s density bonus program during pre-development conferences, inquiries, and at application and highlight the additional development potential available.	Ongoing on a case-by-case basis.
Action 2-2d: Provide technical assistance to developers on how to use the Density Bonus incentives. Promote density bonus for childcare facilities.	Meet with one qualified developer annually to provide information on the County’s Density Bonus program. Maintain current information on the County’s website, including notice of the Density Bonus update within one month of adoption.
Implements the Following Policies	2B
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 2-3 Housing Choice Vouchers

The Housing Choice Voucher (HCV) Program is the federal government's major program for assisting families with very low income and people who are elderly and/or have disabilities to afford decent, safe, and sanitary housing in the private market. This program is administered by the Stanislaus Regional Housing Authority (SRHA). Under this program, very low-income renters receive rental assistance so they can afford housing obtained in the private market without becoming rent burdened.

Actions	Objective and Timeframe
Action 2-3a: Refer HCV holders to a list of properties compiled by SRHA that are actively participating in the Housing Choice Voucher Program.	Provide a link to the SRHA “For Rent” directory on the County’s website by June 2024.
Action 2-3b: Ensure potential tenants and landlords or property managers are informed of the California Fair Employment and Housing Act (FEHA) prohibiting housing discrimination based on source of income (including housing choice vouchers).	Require any County contracted fair housing providers to disseminate information about FEHA by June 2024.
Action 2-3c: Partner with the Stanislaus Regional Housing Authority (SRHA) to increase landlord participation in HCV programs by conducting landlord education and outreach on the program and source of income discrimination.	Partner with SRHA to make HCV program fact sheet available at County offices serving the general public and on the County’s website. Provide fact sheets to property owners seeking building permits for ADUs.
Action 2-3d: Provide support to SRHA as necessary to seek additional funding that can be used, in addition to HCV funds, to provide subsidies to lower-income households to bring monthly rents in line with affordability guidelines.	Meet with SRHA by June 2025 to identify funding needs and opportunities.
Implements the Following Policies	2C
Responsible Agency	County Planning & Community Development County Community Services Agency
Funding Sources	Federal and State Funding

Program 2-4 Support Homeownership Opportunities

The County recognizes that homeownership allows households to gain housing security and build wealth through equity and can serve to strengthen and stabilize neighborhoods.

Actions	Objectives and Timeframe
<p>Action 2-4a: Continue to identify and pursue federal, state, and regional programs to move very low-, low-, and moderate-income families from renters to homeowners, such as HUD’s Homeownership Voucher Program, down payment and closing cost assistance, mortgage financing, and mortgage credit certificates for homebuyers.</p>	<p>Annually identify potential funding sources and, where eligible, pursue funding either directly or by supporting other agencies in their efforts to secure funding. Work with partner agencies to establish an information network connecting potential homeowners to funding sources.</p>
<p>Action 2-4b: Partner with local nonprofit agencies to provide pre-purchase home buying counseling for residents to provide information on mortgage readiness, fair housing education, budgeting for a mortgage payment, credit education, money management, and identifying and avoiding predatory lending.</p>	<p>Provide homebuying counseling to at least 20 residents annually. Coordinate with a least one non-profit organization or employment-related organization, such as teachers’ associations, school districts, and community-based service providers to increase awareness of, and access to, housing resources and financial planning services.</p>
<p>Implements the Following Policies</p>	<p>2A</p>
<p>Responsible Agency</p>	<p>County Planning & Community Development</p>
<p>Funding Sources</p>	<p>Federal and State Funding</p>

Program 2-5 Housing Trust Fund

To increase funding available for affordable housing development and/or maintenance, the County will study the feasibility of establishing a Housing Trust Fund.

Actions	Objective and Timeframe
<p>Action 2-5a: Conduct a feasibility analysis of establishing a local Housing Trust Fund. Study should include analysis of available resources, potential for impact, prioritization of use of funds (i.e., income targeting, rental vs. ownership projects).</p>	<p>Complete feasibility analysis by December 2025; depending on results of analysis, establish trust fund by December 2026.</p>
<p>Implements the Following Policies</p>	<p>2D</p>
<p>Responsible Agency</p>	<p>County Planning & Community Development County Executive Office</p>
<p>Funding Sources</p>	<p>Federal and State Funding</p>

Program 2-6 Regional Collaboration to Facilitate Housing Throughout Stanislaus County

Stanislaus County's Land Use Policies have long recognized the need to balance conservation of agricultural land with the need for urban development. While the County's General Plan identifies areas suitable for residential development, there are constraints to developing in the unincorporated areas and, as such, the County recognized that, with some exceptions, development may be better suited to occur within the incorporated areas.

To facilitate development of affordable housing countywide, the County offers deferrals and waivers of its Public Facilities Fees for qualified affordable housing projects to projects regardless of their locations (incorporated or unincorporated) and has partnered with cities and affordable housing developers to assist with the funding of housing developments located within cities. This monetary support has aided the capacity of cities to meet their RHNA obligation without a reduction in the County's overall RHNA obligation.

Recognizing that the need to increase housing opportunities of all types extends beyond jurisdictional boundaries, the County initiated the Housing Stanislaus Initiative in 2021 with the goal of developing a common vision for housing in Stanislaus County. The desired outcomes of the Initiative are to:

- Establish a shared understanding of the needs, challenges, and opportunities associated with housing in Stanislaus County;
- Develop a unified and actionable countywide vision and strategy framework inclusive of priorities, policies, and investments – for accelerating affordable and market-rate housing in Stanislaus County; and
- Identify and prioritize projects and programs for housing development.

Set to be released in late 2023, strategies emerging from the Housing Stanislaus Initiative effort include the need to:

- Increase capacity within public agencies to keep pace with housing demand and enable more proactive engagement with developers;
- Pursue ongoing refinement of policies, procedures, and regulations that result in mutual benefit to community, public agency, and development applicant;
- Create access to capital, with a focus on capital for affordable and workforce housing;
- Prepare development plans for new areas appropriate for housing and for upgrading infrastructure in existing areas to accommodate housing use;
- Proactively engage developers and property owners of vacant and underutilized properties to encourage their pursuit of housing development; and
- Foster the development of a variety of housing types.

The emerging strategies reflect stakeholders of all interests that have shared their ideas on how local housing needs should be addressed.

Another County-led regional initiative has been Stanislaus 2030 a public-private partnership that aims to advance a shared vision for economic prosperity for all. The culmination of the first phase of Stanislaus 2030 was the 2022 publishing of the Investment Blueprint which includes the highest-leverage opportunities that will move the region's economy forward in the coming decades. The County's regional initiatives recognize the needed balance between jobs and housing in order to have a healthy and strong community.

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The County’s regional collaborations have also included 20+ years of partnership with various cities for HUD entitlement funding. As the lead entity for the Stanislaus Urban County, the County partners with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford for Community Development Block Grant and Emergency Solutions Grant funding. The City of Turlock and the Stanislaus Urban County have partnered as the City of Turlock/Stanislaus County HOME Consortium for HOME Investment Partnership funding, with Turlock serving as the lead entity. Effective July 1, 2023, the County has taken on the role as the lead entity for the new Stanislaus HOME Consortium; a continued partnership between the Stanislaus Urban County and the City of Turlock. The County is also the administrator of the Permanent Local Housing Allocation (PLHA) funding allocated by the State of California on the basis of the 2017 HUD entitlement to the Stanislaus Urban County.

Actions	Objective and Timeframe
Action 2-6a: Incorporate the sharing of the Regional Housing Needs Allocation (RHNA) into the Local Agency Formation Commission (LAFCO) Sphere of Influence (SOI) negotiation process and annexation requests, recognizing the County housing opportunities within the SOI area and County funding provided for housing projects within the city limits.	As opportunity arises when Sphere of Influence expansions and/or annexations are proposed.
Action 2-6b: Continue to collaborate with cities and other regional agencies to implement Housing Stanislaus strategies and to prioritize funding for affordable housing projects and infrastructure needed to preserve existing housing and support new housing.	Regularly participate in regional collaboration meetings aimed at informing regional partners of new housing programs or changes to existing programs.
Action 2-6c: Continue to collaborate with cities and other regional agencies to implement Stanislaus 2030.	Regularly evaluate opportunities to incorporate Stanislaus 2030 strategies into housing programs.
Action 2-6d: Assemble an ongoing advisory committee to monitor progress and foster implementation of the Housing Stanislaus Initiative strategies.	Establish an advisory committee by December 2025.
Action 2-6e: Coordinate between County Behavioral Health and Recovery Services and Community Services Agency to address the continuum of housing needs (i.e., “homelessness to homeownership”).	Ongoing on a case-by-case basis.
Action 2-6f: Continue to collaborate with funding agencies and non-profit housing developers and public service providers in the development of permanent supportive housing	Ongoing on a case-by-case basis.
Implements the Following Policies	2E, 2F
Responsible Agency	County Planning & Community Development County Behavioral health and Recovery Services County Community Services Agency Chief Executive Office
Funding Sources	Federal and State Funding; Department Revenues

Goal 3: Increase housing production by providing adequate sites for a variety of housing types and removing constraints to residential development.

Policies

- 3A Diversity of Housing Types:** The County shall continue to implement land use policies and investigate amended policies that allow for a range of residential densities and housing types, prices, ownership, and size, including low-density single family uses, moderate-density townhomes, and higher-density apartments, condominiums, transit-oriented developments, live-work units, Accessory Dwelling Units (ADUs), and units in mixed-use developments.
- 3B Provide and Maintain Adequate Sites to Accommodate the RHNA.** The County shall maintain appropriate land use designations and densities to accommodate an increased supply of housing units by type, cost, and size to meet its share of the regional housing need in alignment with countywide housing priorities.
- 3C No Net Loss Zoning:** The County shall make findings related to the potential impact on the County's ability to meet its share of the regional housing need when approving discretionary entitlements to rezone residentially designated properties or develop a residential project with fewer units or at a higher income than what is assumed for the site in the Housing Element Sites Inventory, consistent with zoning requirements in Government Code Section 65863.
- 3D Streamline Housing Entitlement and Permitting Process.** The County shall streamline the housing approval and permitting process, particularly for affordable housing, throughout County departments.
- 3E Clear Development Standards and Approval Procedures:** The County shall create and administer clear objective development standards and approval procedures for a variety of housing types, including, but not limited to, multifamily housing and emergency shelters.
- 3F Facilitate Infill Development.** The County shall utilize infill development strategies to further develop and improve existing neighborhoods with the infrastructure to serve new development.
- 3G Facilitate Strategic Development on Large Lots.** The County shall support and facilitate strategic development on large lots to promote cohesive and connected development that provides housing for a variety of household incomes and types.
- 3H Residential Uses Close to Services:** The County shall encourage development of residential uses close to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.
- 3I Compatible Development of Underutilized Sites:** The County shall encourage compatible residential development in areas with underutilized non-agricultural lands.
- 3J Flexible Standards and Regulations:** The County shall allow flexibility within the County's standards and regulations to encourage a variety of housing types.
- 3K Adaptive Reuse:** The County shall support innovative strategies for the adaptive reuse of residential, commercial, and industrial buildings to provide for a variety of housing types and residential uses.
- 3L Residential Sites Inventory:** Maintain a vacant and underutilized residential sites inventory and assist residential developers in identifying land suitable for residential development.

- 3M Preserve Multifamily Land Use:** Preserve the existing supply of land that allows multi-family dwellings and discourage development on such land at lower residential densities or with solely nonresidential land uses.
- 3N Infrastructure Development.** The County shall continue to utilize its HUD CDBG funding allocation, and seek new funding, for infrastructure needed to upgrade existing areas as a means of preserving existing housing units and to accommodate new housing uses.
- 3O Development within Cities:** The County will continue to work with cities to leverage available funding for the development of affordable housing projects throughout Stanislaus County.
- 3P Public Facility Fee Waivers:** The County shall continue to waive Public Facilities Fees for qualified affordable housing projects to be developed throughout Stanislaus County.

Programs

Program 3-1: Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth

The unincorporated county share of the RHNA is 2,475 units for the 2023-2031 Housing Element planning period. With anticipated pipeline projects and projected ADUs, a total of 437 units can be credited toward the County’s RHNA. The remaining 2,072 RHNA units (574 very low-, 398 low-, 458 moderate-, and 608 above moderate-income units) must be accommodated through adequate sites planning.

Actions	Objective and Timeframe
Action 3-1a: Maintain an updated inventory of housing sites and actively promote sites available for lower- and moderate-income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations.	Publish on the County’s website by June 2024 and update annually after submitting the County’s Annual Progress Report every April.
Action 3-1b: Actively promote sites available for affordable housing development to potential developers, private and nonprofit organizations, and other interested persons and organizations.	Send annual notices promoting the Housing Elements Sites Inventory and offering to meet with developers to discuss affordable housing development.
Action 3-1c: Maintain an updated list of residential housing developments that have been submitted, approved, and denied throughout the housing cycle. Comply with California law regarding reporting requirements including, without limitation, annual reporting in accordance with Government Code Section 65400.	Publish by June 2024 and update annually as part of the Annual Progress Report.
Action 3-1d: In compliance with updates to the Surplus Land Act (AB1255, 2019-Rivas; AB 1486, 2019-Ting), identify County-owned land for the development of affordable housing. The County will coordinate with CSD staff to pursue necessary actions to support and promote housing on CSD-owned sites.	Report on identified surplus land in the Housing Element Annual Progress report. Prioritize releasing Surplus Lands Act-related documents for two County-owned parcels (APNs 045-066-059 and 133-017-006) and one parcel owned by Denair CSD (024-024-038) by January 2027.
Action 3-1e: Amend Zoning Ordinance to prohibit development of single-family dwellings in multifamily zones or land use designations.	Adopt Zoning Ordinance amendment by June 2024.
Action 3-1f: Regularly review Measure E to evaluate its effect on the County’s ability to meet its housing needs.	Review Measure E annually as part of the Annual Progress Report

Actions	Objective and Timeframe
Action 3-1g: Proactively engage property owners of vacant and underutilized properties to encourage their pursuit of housing development.	Send annual notices to property owners of vacant and underutilized sites listed on the Sites Inventory offering to meet with them to discuss development options for their property.
Action 3-1h: Rezone sites to accommodate the County’s shortfall of capacity in the 6th Cycle Housing Element sites inventory (842 lower-income units and 107 moderate-income units).	Complete all necessary General Plan and Zoning Ordinance text and map amendments within one or three years of 6th Cycle Housing Element certification, as allowed by State Housing Law.
Implements the Following Policies	3A, 3B, 3D, 3K, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-2 No Net Loss Zoning

Government Code Section 65863, otherwise known as “No Net Loss” law, prevents the loss of existing housing and land available for future discretionary residential development by ensuring that cities and counties “identify and make available” additional adequate sites if a housing project is approved with fewer units by income category than what is identified in the Housing Element to meet RHNA. In compliance with State law, the County will expand and improve upon the ongoing no net loss efforts to develop a procedure to track:

- Unit count and income/affordability assumed on parcels included in the sites inventory
- Actual number of units achieved and income/ affordability when parcels are developed
- Net change in capacity and summary of remaining capacity in meeting remaining RHNA

Unit count and income/affordability are identified in the Sites Inventory.

Actions	Objective and Timeframe
Action 3-2a: Monitor inventory sites throughout the duration of the planning period to ensure the County remains on track towards satisfying its RHNA target for all income levels.	Monitor development of inventory sites at least annually with submittal of Annual Progress Report every April.
Action 3-2b: Maintain an administrative list of additional sites with appropriate zoning that can be added to the County’s Sites Inventory if and when an analysis provided the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County’s remaining RHNA, by income level, for the planning period.	Create list by December 2025 and update annually as needed.
Action 3-2c: If development of inventory sites does not occur at densities assumed in the sites inventory during the planning period, identify alternative sites from the County’s administrative list of additional sites with appropriate zoning.	Rezone sufficient sites within six months of identification of the shortfall.
Action 3-2d: Maintain an administrative list of additional sites, including Measure E impacted lands within a LAFCO adopted Sphere of Influence or adopted County Community Plan area exempt from County voter approval in accordance with Goal Seven, Policy Thirty-two of the Land Use Element of the General Plan , that may be added to the County’s Sites Inventory if and when the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County’s remaining RHNA, by income level, for the planning period.	Create a list by March 2025 and update annually as needed.

Actions	Objective and Timeframe
Implements the Following Policies	3B, 3C, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-3 Replacement Housing

Pursuant to AB 1397 (Adequate Sites) passed in 2017, the County will amend the Zoning Ordinance to require the replacement of existing residential units on nonvacant RHNA sites as a condition of discretionary project approval for development. Specifically, sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households, shall replace those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall also be consistent with those set forth in the State Density Bonus Law.

Actions	Objective and Timeframe
Action 3-3a: Amend the Zoning Ordinance to establish the replacement requirements pursuant to Government Code Section 65583.2(g)(3)).	Amend Zoning Ordinance by December 2025.
Implements the Following Policies	3C
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-4 By-Right Approval for Projects with 20 Percent Affordable Units

Pursuant to AB 1397 (Adequate Sites) passed in 2017, the County will allow a by-right approval process, at appropriate densities (at least 20 units per acre), for housing development that includes 20 percent of the units as housing affordable to lower-income households, on sites being used to meet the 6th Cycle RHNA if the site was:

- A vacant site for RHNA identified in the previous two Housing Element cycles;
- A nonvacant site for RHNA identified in the previous one Housing Element cycle; or
- A site rezoned for RHNA after the statutory deadline of the 6th Housing Element cycle

By-right approval means the jurisdiction shall not require:

- A Site Plan Review, Administrative or Conditional Use Permit;
- A Planned Development District; or
- Other discretionary, local-government review or approval that would constitute a “project” as defined in Section 21100 of the Public Resources Code (California Environmental Quality Act “CEQA”)

The Sites Inventory includes two nonvacant opportunity sites (APNs 133-015-016 and 037-032-045) that meet the criteria above.

Actions	Objective and Timeframe
Action 3-4a: Pursuant to Government Code Section 65583.2 subdivision (i), amend Zoning Ordinance to permit by-right approval for housing developments that include at least 20 percent of units as affordable to lower-income households on non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing element inventories and on sites that are being rezoned to accommodate the lower-income RHNA of the 6 th cycle housing element.	Amend Zoning Ordinance by January 2024.
Implements the Following Policy	3K
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-5 Adaptive Reuse

In recognition of older commercial buildings that may no longer be occupied by the highest and best uses or compatible uses with its surrounding neighborhoods and that the economic impacts of the COVID-19 pandemic may have further accelerated the decline of these properties, the County will pursue opportunities to establish alternative regulations for the conversion of existing buildings to other uses.

Actions	Objective and Timeframe
Action 3-5a: Evaluate, and if appropriate, amend the County Code to remove potential constraints for adaptive reuse, such as review/approval process and minimum parking standards. Promote adaptive reuse to property owners and interested developers through public outreach.	Evaluate the County Code by June 2025 and, if necessary, revise County Code within one year.
Implements the Following Policy	3L
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-6 Zoning for a Variety of Housing Types

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, smaller-scale multi-family housing in existing single-family neighborhoods, manufactured housing, supportive and transitional housing, single-room occupancy units, residential care facilities, and emergency shelters. This program, by allowing a wider range of housing types in all neighborhoods, would also provide for a variety of housing prices, styles, and sizes, which contributes to neighborhood stability by offering more affordable and move-up homes and accommodating a diverse mix of incomes.

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Actions	Objective and Timeframe
<p>Action 3-6a: Explore innovative and alternative housing options that provide greater flexibility and affordability in the housing stock. This may include allowing shelters, transitional housing, and tiny homes with wraparound services on land owned by faith-based organizations, social services agencies, and nonprofits that do this work in the community and on publicly owned land.</p>	<p>Explore options by December 2025 and, if determined feasible, amend Zoning Ordinance within one year.</p>
<p>Action 3-6b: Review all residential zoning districts and land use designations to determine feasibility for additional development in low-density neighborhoods. Amend the Zoning Ordinance to allow, by right or via streamlined review process, a mix of dwelling types and sizes, specifically “missing middle” housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) in lower-density residential areas.</p>	<p>Complete review by December 2025 and, if determined feasible, amend Zoning Ordinance within one year.</p>
<p>Action 3-6c: Evaluate the permit process for residential care facilities for seven or more persons and amend the Zoning Ordinance to include a set of objective standards to provide certainty to applicants through the permitting process. Evaluate the potential of allowing the use through an administrative permit process or as a by-right use subject to objective standards.</p>	<p>Evaluate the permit process by December 2025 and, as necessary, amend the Zoning Ordinance within one year.</p>
<p>Action 3-6d: Amend the Zoning Ordinance parking regulations for Homeless and Emergency Shelters and Navigation Centers to comply with Government Code Section 65583, subdivision (a)(4)(A).</p>	<p>Amend Zoning Ordinance by December 2025.</p>
<p>Action 3-6e: Amend the Zoning Ordinance to comply with Government Code Section 65661 which requires a Low Barrier Navigation Center to be a use by-right in areas zoned for mixed-use and nonresidential zones permitting multifamily uses, provided specific requirements of the law are met.</p>	<p>Amend Zoning Ordinance by December 2025.</p>
<p>Action 3-6f: Amend the Zoning Ordinance definitions of “multiple dwellings” and “dwelling groups” for clarity and consistency.</p>	<p>Amend Zoning Ordinance by December 2025.</p>
<p>Action 3-6g: Amend the Zoning Ordinance to define Single-Room Occupancy developments as a permitted residential use in multifamily districts.</p>	<p>Amend Zoning Ordinance by December 2025.</p>
<p>Action 3-6h: Amend the Zoning Ordinance to address the requirements of SB 9, including developing objective design standards for qualifying projects.</p>	<p>Amend the Zoning Ordinance by December 2025.</p>
<p>Action 3-6i: The County will promote other types of alternative housing options including single-room occupancy developments or conversions, group homes, and permanent supportive housing.</p>	<p>Ongoing on a case-by-case basis.</p>
<p>Implements the Following Policy</p>	<p>3D, 3E, 3F, 3G, 3N</p>
<p>Responsible Agency</p>	<p>County Planning & Community Development</p>
<p>Funding Sources</p>	<p>Department Revenue</p>

Program 3-7 Expedited Project Review

The County continues to improve the efficiency of the development review process. As a response to the housing shortage in the State of California, Government Code Section 65920 was amended to restrict local rules that limit housing production. Amendments to Government Code Section 65920 changed the Permit Streamlining Act by creating a more ministerial, rather than discretionary, two-step application process for housing projects. The County will continue to identify efficiencies for the development process in line with Government Code Section 65920 a. The County will also coordinate with developers to ensure a timely application and development process.

Actions	Objective and Timeframe
Action 3-7a: Continue to offer a free Pre-Application Review process for developers. This review provides developers with a preview of potential issues the proposed development that could result in major costs before they spend money developing plans and submitting an application.	Ongoing on a case-by-case basis.
Action 3-7b: Assess existing processes in order to identify streamlining opportunities, such as ministerial review for projects that include a percentage of affordable housing units.	Assess existing processes by January 2025 and, if opportunities to streamline are determined feasible, revise the process within one year.
Action 3-7c: Review the County’s permit process to ensure compliance with AB 2011 (Wicks, 2022) which allows for ministerial, by-right, approval for affordable housing on commercially zoned lands, and also allows such approvals for mixed-income housing along commercial corridors, as long as the projects meet specified affordability, labor, and environmental criteria.	Review permit process for compliance by January 2024.
Action 3-7d: Maintain staffing assigned to the One-Stop-Shop at a capacity level adequate to keep pace with demand and enable more proactive engagement with developers.	Assess staffing capacity with all One-Stop-Shop partners annually.
Action 3-7e: Implement a web-based interactive permit guide that outlines a step-by-step process for residential development including: identifying steps in the entitlement and building permit process, detailed information on development incentives, and funding programs and resources for affordable housing development.	Fully implement use of a web-based interactive permit guide by June 2025.
Action 3-7f: Develop objective design standards for housing development that will help the County meet RHNA obligations, including, but not limited to, multifamily housing, ADUs, SROs, duplexes, and triplexes, while providing a streamlined permitting process.	Adopt objective standards, as necessary, by January 2025.
Implements the Following Policies	3D, 3E,3C, 3Q
Responsible Agency	County Planning & Community Development County Public Works County Department of Environmental Resources County Fire Warden
Funding Sources	Department Revenues

Program 3-8 Accessory Dwelling Units

Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) represent an important opportunity to create more affordable housing for lower and moderate-income households. This program will promote and facilitate the development of ADUs throughout the unincorporated county.

Actions	Objective and Timeframe
Action 3-8a: Maintain and explore opportunities to enhance existing ADU planning tools, including the County’s ADU information website, interactive permit guides, ADU email list, and pre-approved ADU plans.	Facilitate the development of 184 ADUs over the planning period.
Action 3-8b: Update Chapter 21.74 of the County Ordinance for consistency with state law (Government Code Section 65852.2) to allow for sale or conveyance of ADUs in limited circumstances.	Update the Zoning Ordinance by January 2024.
Action 3-8c: Work with organizations, such as community development corporations to identify gap funding for lower-income homeowners to build ADUs, or to develop or preserve ADUs for income-qualified tenants.	Evaluate the feasibility of using PLHA funds for this purpose by June 2025.
Action 3-8d: Partner with an organization involved in affordable housing or community development activities to provide informational workshops to property owners about the ADU permitting and building process. Target outreach to property owners in low- and moderate-resource areas and provide workshops and materials appropriate for residents with limited English proficiency.	Facilitate one workshop annually with the objective of facilitating at least 45 ADUs in low- and moderate-resource areas.
Action 3-8e: Through public-facing materials and outreach activities, promote the development of ADUs in high-resource areas like Salida, East Oakdale, and Hickman.	Facilitate the development of at least 45 ADUs in high-resource areas.
Implements the Following Policy	3J, 3K
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State funding.

Program 3-9 Infrastructure

Infrastructure availability is crucial to the development of housing to meet the County’s share of the RHNA. This program will facilitate the prioritization and expansion of services for affordable housing projects.

Actions	Objective and Timeframe
Action 3-9a: Transmit notice of Housing Element adoption to all sewer and water providers serving the unincorporated county area.	Send notice of adoption of the Housing Element to service providers within one month of certification.
Action 3-9b: Continue to assess and prioritize the infrastructure needs of underserved communities.	Annually review and update infrastructure prioritization studies.
Action 3-9c: Continue to prioritize the use of the County’s portion of HUD entitlement funding for sewer and water infrastructure projects.	Evaluate funding needs as part of the 5-year Consolidated Plan update process.
Action 3-9d: Conduct an assessment to determine the feasibility of Tax Increment Financing Districts and Enhanced Infrastructure Financing Districts being used to support housing development.	Complete assessment by June 2026 and report results as part of the Annual Progress Report.
Action 3-9e: Implement a fee schedule that assesses fees on single-family and multi-family homes proportional to their impact, pursuant to State law.	Conduct a study to evaluate the infrastructure impact of single-family and multi-family homes and update the fee schedule by June 2026.
Action 3-9f: Explore opportunities to increase accessible transit options throughout unincorporated Stanislaus County to facilitate housing mobility for lower-income families	Conduct a mobility study for unincorporated Stanislaus County by January 2028.
Implements the Following Policies	30
Responsible Agency	Public Works Department County Planning & Community Development County Executive Office
Funding Sources	State and Federal Funding, Department Revenues

Goal 4: Provide housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, and persons with disabilities.

Policies

- 4A Address Special Housing Needs:** The County shall address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, and supportive housing.
- 4B Housing and Supportive Services:** The County shall promote housing and supportive services for households with special needs including seniors, persons with disabilities, single parents, and individuals experiencing homelessness.
- 4C Reasonable Accommodation:** The County shall continue to implement a reasonable accommodation process for persons with disabilities to request exceptions or modifications of zoning, permit processing, and building regulations to ensure housing is accessible.
- 4D Support Stanislaus Community System of Care (the local Continuum of Care):** The County shall support the local Continuum of Care in its efforts to meet the needs of homeless families and individuals.
- 4E Support Organizations Serving the Homeless Community:** The County shall support the efforts of non-profit and community organizations that provide emergency shelter and other assistance for the homeless population, including alcohol and drug recovery programs.
- 4F Range of Housing for Seniors:** The County shall facilitate and encourage the development of a range of housing types for seniors from which support services are readily accessible.
- 4G Family Housing:** The County shall encourage the development of housing that provides for families with children (such as larger rental and ownership units for lower- and moderate-income families) and the provision of services such as childcare and after-school care when feasible.
- 4H Universal Design Standards:** The County shall implement universal design standards or guidelines that promote accessibility for everyone regardless of age or physical ability.

Programs

Program 4-1 Housing for Special Needs Populations

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.

The County of Stanislaus is a diverse community with many residents who have special housing needs. State law requires the housing element to address the needs of specific groups with special housing needs, including extremely low-income residents, seniors, persons with disabilities, large families, female-headed households with children, and persons experiencing homelessness. The County will continue to monitor its policies, standards, and regulations to ensure that they comply with applicable laws pertaining to housing for special needs populations.

Actions	Objective and Timeframe
Action 4-1a: Establish a scoring criterion for affordable housing projects that encourage the inclusion of units and services needed to support individuals with special needs.	Amend funding policies to establish criteria that encourage special needs housing by June 2025.
Action 4-1b: Explore development of an ordinance that promotes and encourages the use of Universal Design Principles in new construction and/or rehabilitation of housing.	Explore the development of guidelines or standards by January 2025.
Action 4-1c: Review the Reasonable Accommodations Ordinance and amend if needed.	Amend Zoning Ordinance by January 2024, if needed.
Action 4-1d: Continue to coordinate the housing efforts of the County’s Planning Department, Community Services Agency, and Behavioral Health and Recovery Services to maximize leveraging of existing funding for special needs housing and services, and to build staffing capacity.	Meet regularly with County departments and regional agencies throughout the planning period.
Implements the Following Policies	4A, 4B, 4C
Responsible Agency	County Planning & Community Development Community Services Agency Behavioral Health and Recovery Services
Funding Sources	Department Revenues

Program 4-2 Farmworker Housing

Actions	Objective and Timeframe
Action 4-2a: Continue coordinating with regional partners (County’s Agricultural Advisory Board, Stanislaus Regional Housing Authority, agricultural producers, and community-based organizations) to identify changing needs for farmworker housing in the County. Assess current regulations and needs and make changes to the Zoning Ordinance if necessary.	Meet with stakeholders once by December 2024 and present the County’s General Plan Update Committee with recommended amendments to the Zoning Ordinance, if any, by June 2025.
Action 4-2b: Assist property owners, builders, and non-profit housing developers with securing funding resources, qualifying for density bonuses, and prioritizing infrastructure availability for farmworker housing projects.	Provide technical assistance to facilitate the development of at least 30 units of affordable farmworker housing during the planning period.
Action 4-2c: Amend Zoning Ordinance provisions regarding farmworker housing for consistency with state law.	Amend Zoning Ordinance by January 2025.
Implements the Following Policies	4A, 4G
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenues

Program 4-3 Homelessness

The County coordinates with cities, regional agencies, service providers, and the Stanislaus Community System of Care (CSOC, the local Continuum of Care), to address homelessness. The County will continue to coordinate with these agencies and service providers to implement the Regional Homeless Strategic Plan, while implementing policy solutions aimed at increasing availability of emergency shelters, transitional housing, and other housing types for people experiencing and transitioning out of homelessness.

Actions	Objective and Timeframe
Action 4-3a: When shown to be locally effective, promote home-sharing programs to connect homeowners with tenants and create income and housing opportunities for lower-income households, seniors, and persons with disabilities.	Provide information on home-sharing programs on the County’s website and ensure service providers are connecting clients with home-sharing programs as appropriate.
Action 4-3b: Continue to support the Stanislaus Community System of Care (CSOC) in its efforts to coordinate with low-income housing producers and advocates, social service providers, representatives of public agencies, and other interested organizations in the implementation of the Regional Homeless Strategic Plan for Stanislaus.	Regularly participate in CSOC meetings and their related sub-committees to assist with providing technical support as needed.
Action 4-3c: Assess the County’s capacity to accommodate individuals experiencing homelessness in unincorporated areas by comparing the most recent homeless point-in-time count to the number of shelter beds available Countywide on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing. If capacity is not sufficient, amend the Zoning Ordinance as necessary to continue to meet the County’s unincorporated area need.	Bi-annually with release of the Point-In-Time count. If determined to be necessary, adopt zoning ordinance amendments within six months of publishing Point-In-Time Count.
Action 4-3d: Continue to use federal and state funds, as available, to support any additional need in the unincorporated area for emergency shelters, and transitional and supportive housing programs for the homeless and those who are at-risk of becoming homeless.	Ongoing as part of the funding allocation processes.
Action 4-3e: Amend the Zoning Ordinance to remove the 10 bed per zone limit and increase the size limit for emergency shelters to at least 20 beds per facility, pursuant to State law.	Amend Zoning Ordinance by January 2025.
Implements the Following Policies	4D, 4E
Responsible Agency	County Planning & Community Development County Community Services Agency County Behavioral Health and Recovery Services
Funding Sources	Federal and State funding Department Revenue

Program 4-4 Community Outreach and Education

Community outreach is a key component to developing a comprehensive and inclusive housing market in the County. It is critical to engage local community groups and stakeholders from all sectors of the community to educate and provide inclusive housing opportunities and to understand housing needs. The goal of this program is to provide community groups that are affected by restrictions to fair and equitable housing greater opportunities for becoming informed and engaged in the County’s housing and overall planning process.

Actions	Objective and Timeframe
Action 4-4a: Work with community groups and service providers to increase accessibility to public workshops by identifying suitable times, preferred meeting types (in person, virtual, or hybrid meetings), having meetings be accessible to persons with disabilities, and having meetings be accessible to nearby transit centers. (Environmental Justice)	Ongoing on a case-by-case basis.
Action 4-4b: Maintain a list of neighborhood groups and other community organizations that advocate for protected housing groups including seniors, individuals with disabilities, large households, and other groups, and disseminate information about housing opportunities and participate in community meetings as requested.	Develop list by January 2025 and update contact information annually. Disseminate information on an ongoing basis as opportunities become available.
Action 4-4c: Develop a county-wide language access policy to ensure residents with limited English proficiency have accessible information. (Environmental Justice)	Implement policy by January 2025.
Action 4-4d: Review the County’s outreach methods for housing programs and community planning activities annually in an effort to increase participation. Collaborate with existing and new community stakeholders from all sectors and geographic areas to engage in the public participation process. (Environmental Justice)	Review County outreach methods by December 2026 and make necessary changes within six months.
Implements the Following Policies	4D
Responsible Agency	County Planning & Community Development Chief Executive Office
Funding Sources	Federal and State Funding Department Revenues

Goal 5: Ensure fair and equal housing opportunities.

Policies

- 5A Fair Housing Services:** The County shall support services and programs that work to eliminate housing discrimination and ensure that residents are aware of their rights and responsibilities regarding fair housing.
- 5B Housing Discrimination:** The County shall support efforts within its control to prevent discrimination in the sale or rental of housing with regard to race, ethnic background, religion, disability, income, sex, age, and household composition.
- 5D Fair Housing Outreach:** The County shall continue to conduct fair housing outreach and education for unincorporated residents, property owners, and housing providers to ensure each understands their rights and responsibilities.
- 5E Rental Assistance:** The County shall continue to support rental assistance for lower-income households who have fallen behind on rent and need assistance on regaining or gaining housing stability.
- 5F Fair Chance Housing:** The County shall refer individuals with poor credit history, poor landlord referral/references, formerly incarcerated, or other mitigating circumstances to service providers who can assist them with housing opportunities.

Programs

Program 5-1 Affirmatively Furthering Fair Housing & Environmental Justice

AB 686 (2017, Santiago) requires each local government to administer its programs and activities related to housing in a manner that affirmatively furthers fair housing. The County will take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities. Chapter 3, *Affirmatively Furthering Fair Housing (AFFH)*, summarizes the fair housing issues and concerns in Stanislaus County based on findings of the County of Stanislaus Analysis of Impediments to Fair Housing Choice 2020-2025 (AI) and additional research conducted as part of this Housing Element update. Programs under this goal are designed to affirmatively reduce barriers to housing and increase equitable conditions across neighborhoods, addressing issues such as historic and existing racial and economic inequities, housing mobility and access, community investment and engagement, and environmental health. The findings of the AFFH analysis were used to develop meaningful actions and metrics and milestones that promote inclusive communities, increase housing opportunities, and address racial/ethnic and economic disparities in the unincorporated county.

Actions	Objectives and Timeframe
<p>Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.</p>	<p>Review policies and procedures for community development and housing assistance programs by December 2026 and make necessary changes within six months.</p>
<p>Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). Review an individual institution’s most recent Home Mortgage Disclosure Act (HMDA) reporting as most recently published by the Federal Financial Institutions Examination Council (FFIEC).</p>	<p>Ongoing, during each funding cycle.</p>
<p>Action 5-1c: Assess the feasibility of allowing a variety of home-based economic opportunities in residential neighborhoods, e.g., micro-kitchens, day cares, and home occupations.</p>	<p>For those opportunities determined feasible, establish a plan to Amend County Code by June 2025.</p>
<p>Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities</p>	<p>Seek funding annually as applicable Notices of Funding Availability (NOFA) become available.</p>
<p>Action 5-1e: Modify the County’s program guidelines according to funding regulations, if necessary, to allow the use of eligible State and/or Federal funding to repair failing septic systems.</p>	<p>Modify funding policies by June 2025.</p>
<p>Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6th Cycle Housing Element planning period.</p>	<p>Apply for Prohousing designation by June 2026.</p>
<p>Action 5-1g: Offer training to County staff on a variety of topics included in the County’s Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)</p>	<p>Beginning 2025, offer training sessions annually during the planning period.</p>
<p>Action 5-1h: Update the Safety Element to comply with State Environmental Justice requirements and Housing Element Update regulations.</p>	<p>Complete the Safety Element Update by June 2024.</p>
<p>Implements the Following Policies</p>	<p>5A, 5B</p>
<p>Responsible Agency</p>	<p>County Planning & Community Development Community Services Agency Chief Executive Office County Behavioral health and Recovery Services</p>
<p>Funding Sources</p>	<p>Federal and State Funding Department Revenues</p>

Program 5-2 Fair Housing Services

The County contracts annually with a fair housing and tenant/landlord services provider as part of its CDBG program. The primary objective of the program is to build awareness of housing laws, tenants' rights, and prevent evictions.

Actions	Objective and Timeframe
<p>Action 5-2a: Coordinate with qualified organizations to provide fair housing and tenant/landlord services, including housing counseling and education and tenant/landlord counseling and mediation. Provide written information and workshops in multiple languages. Ensure outreach to identified Disadvantaged Communities, specifically Cowan Tract, Crows Landing, Grayson, Keyes, Monterey Park Tract, Riverdale Park Tract, and Westley¹. (Environmental Justice)</p>	<p>Maintain fair housing provider contract and aim to provide at least 90 percent of services in Disadvantaged Communities.</p>
<p>Action 5-2b: Through a fair housing provider, provide information and referral services that direct families and individuals to financial resources for housing rental or purchase, locating suitable housing, and obtaining housing with special needs facilities such as accessible units.</p>	<p>Hold at least eight informational events during the planning period to disseminate informational materials or provide trainings to residents, at least once every two years in communities sensitive to displacement (see Chapter 3, Affirmatively Furthering Fair Housing, Section 3.7.3).</p>
<p>Action 5-2c: Provide training opportunities for property owners and managers about the requirements of federal, state, and local laws related to real estate, housing discrimination, tenant protection, and housing inspection. Work cooperatively with the real estate industry to develop ways for agents and property managers to become more familiar with County housing and rental assistance programs. Encourage realtors to seek fair housing training.</p>	<p>Partnering with a fair housing provider, hold two training sessions annually.</p>
<p>Action 5-2d: Require contracted fair housing provider to conduct random fair housing testing at least annually.</p>	<p>Annual testing.</p>
<p>Action 5-2e: Disseminate fair housing information via targeted social media efforts.</p>	<p>Add more information about fair housing agencies and services on the County's webpage and social media by January 2024.</p>
<p>Implements the Following Policies</p>	<p>5A, 5B, 5C, 5C</p>
<p>Responsible Agency</p>	<p>County Planning & Community Development</p>
<p>Funding Sources</p>	<p>Federal and State funding</p>

¹ Stanislaus County Disadvantaged Unincorporated Communities Report. <https://www.stancounty.com/planning/pl/documents/gp/i-d-stanislaus-county-disadvantaged-unin-communities-report.pdf>

Program 5-3 Displacement Prevention

Actions	Objective and Timeframe
Action 5-3a: Partner with fair housing organizations to ensure dissemination about the California Tenant Protection Act of 2019 (AB 1482). Develop print and online educational materials and make materials available at County facilities and on the County’s website including social media.	Make materials available at County facilities and on the County’s website by June 2024.
Action 5-3b: Explore opportunities to expand funding to increase capacity of fair housing providers to expand tenant mediation services.	If funding sources are identified and determined feasible, work with fair housing providers to actively seek new funding or reallocate existing funding for expanded services by June 2026.
Implements the Following Policies	5A, 5B, 5C, 5E
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State funding

6.1 Summary of Quantified Objectives

The County’s quantified objectives for the 2023-2031 planning period are as follows:

- Sites to facilitate new housing units, including the County’s RHNA of 287 extremely low-income units, 287 very low-income units, 398 low-income units, 458 moderate-income units, and 1,045 above moderate-income units
- New development of 100 lower-income units, 100 moderate-income units, and 100 above moderate units. This would exceed the County’s 5th Cycle development trends.
- Rehabilitation of 24 affordable units
- Construction of 184 ADUs
- There are currently no at-risk housing units in unincorporated Stanislaus County

Table 6-1 summarizes these objectives for the 2023-2031 planning period by income category.

Table 6-1 Quantified Housing Objectives (2023-2031)

	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	287	287	398	458	1,045	2,475
New Development	33	33	34	100	200	400
Units To Be Rehabilitated	8	8	8	0	0	24
ADUs	0	0	0	0	184	184
At-Risk Housing Units to be Preserved	0	0	0	0	0	0

Note: Government Code Section 65583 mandates that localities calculate the subset of the very-low income regional need that constitutes the communities need for extremely low-income housing. As an alternative to calculating the subset, local jurisdictions may assume that 50 percent of the very low-income category is represented by households of extremely low income (less than 30 percent of the median family income).

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Appendix A

Summary of Public Participation

Summary of 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 65583(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 mapping exercise. A summary of the public participation is detailed below. Detailed information on the public engagement program is outlined below. Copies of community engagement materials are provided in this appendix.

Public Noticing

To reach the largest and broadest spectrum of community members and stakeholders, Stanislaus County utilized the following notification methods throughout the Housing Element update process:

- Flyers in English and Spanish advertising the project, community workshops, the community survey, and the participatory mapping activity were posted on the County’s website.
- Posts to the County’s social media accounts, including Facebook and Instagram, advertising the survey and the participatory mapping exercise.
- Email lists of community stakeholders, local governmental departments, and the 6th cycle Housing Element update email subscriber list to provide outreach and regular updates on the project. In addition, the County used Everbridge, the County’s mass notification system, to deliver notices to over 1,000 individuals.
- Letters to property owners of sites identified for potential rezoning were distributed with an overview of the Housing Element update process and an invitation to submit feedback.

Community Outreach

Community Workshops

The County held two in-person and virtual community workshops to inform the draft Housing Element in June and October of 2022. The workshops introduced Housing Element and General Plan goals and requirements to the community, educated the community on housing element requirements, and assessed participants’ housing needs, priorities, and concerns.

Flyers advertising the workshops were posted on the County's website, and stakeholders were emailed in advance of the workshop series. The flyers provided meeting details (dates, times, locations, zoom links), the Housing Element Update website and email address. Spanish translation services were made available for each workshop upon request. Each workshop consisted of a presentation and opportunities for discussion and input from participants.

A virtual workshop was held on June 23, 2022, via Zoom to discuss the Housing Element Update and related updates. During the workshop, the project team facilitated group discussions on housing, safety, and environmental justice. Participants noted the following housing issues:

- A housing-first approach is needed. Homeless and transitional housing is needed. This is the most immediate need in the county.
- Affordable senior housing is needed. They are a growing part of the population and there are few units.
- Zoning is a barrier. 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. Even when non-profits, such as Aspira Net, can help cover some costs, individuals still struggle to find available units and often don't have families to help secure housing.
- Similarly, housing choice vouchers can be obtained but there are few available housing options.
- The unincorporated area is diverse: urban to rural. There is significant need in urban areas, especially near Modesto. Proximity to transportation and resources should be considered. Outward growth is not in the interest of low-income households.
- Aging and veteran services are needed, including subsidized senior housing. Currently there is a 2-4 year waiting list for subsidized senior housing. Seniors are a special population. Low-income seniors have little economic mobility and have many needs.
- Attracting developers is tough. More incentives are needed for developers of special needs and senior housing.

An in-person community workshop was held on October 11, 2022 to gather community input on the site inventory selection component of the Housing Element and on issues related to safety and environmental justice. During the workshop, participants were encouraged to provide specific input on the potential housing types and locations of new residential development. Additionally, residents were provided information on the Safety Element update, including basic findings from the vulnerability assessment and feedback on hazards and environmental issues in the county. Residents were also informed of the Environmental Justice Element Update, which will include environmental justice policies throughout the different elements of the General Plan.

Following a presentation, attendees participated in five workshop stations:

- **Station 1** provided an overview of the Housing Element Update.
- **Station 2** provided an overview of the proposed site inventory with a mapping exercise for participants to comment on the proposed sites and identify additional potential sites for the inventory and/or rezone effort. An informational handout was provided for participants that showed six areas with proposed zoning changes and three areas without zoning changes. There were also laptops available for participants to conduct the participatory mapping exercise.

- **Stations 3 and 4** provided context for planning efforts related to climate and environmental justice.
- **Station 5** included the Housing Element Update schedule.

Participants expressed the following concerns:

- Traffic conditions that could result from new residential developments.
- Housing access and availability, particularly for rental housing.
- Housing options for college students.

Images of participation at stations are shown in Attachment 3.

Housing Element Presentations

The consultant team and County staff held presentations on the Housing Element Update to the General Plan Update Committee (GPUC) and the Planning Commission. The GPUC is comprised of two Stanislaus County Board Supervisors and two Stanislaus County Planning Commissioners. The July 7, 2022, presentation to the GPUC provided an overview of the Housing Element Update, the regional housing needs allocation (RHNA), state legislation, the Safety Element Update, and the Environmental Justice Element. The September 1, 2022, presentation to the GPUC discussed the sites inventory with an overview of proposed rezone sites.

A presentation to the GPUC was held on April 6, 2023, to solicit feedback on proposed policy and programs included in the Housing Element Housing Plan. The GPUC provided input on a variety of proposed housing programs, including the need for improved code enforcement data, inclusionary housing, and incentives for increased housing development such as density bonuses, public facility fee waivers, accessory dwellings. They also noted that more migrant and farmworker housing is needed, as well as more Housing Choice Vouchers, and shelter beds. Additionally, the Committee discussed the possibility of using a Community Development Financial Institution Fund, or an Enhanced Infrastructure Financing District to increase infrastructure and homeownership in the County. The Committee identified Keyes, and possibly parts of Denair for potential agricultural land redevelopment. A fourth presentation was held on August 23, 2023 to present the Draft Housing Element, amended Housing Plan, and changes to the sites inventory.

An overview of the 6th cycle Housing Element Update was provided to the Planning Commission on July 7, 2022.

Additionally, the County met with California Rural Legal Assistance, Inc. (CRLA) on December 6, 2022, to discuss and receive feedback on the identified proposed rezone sites, and distributed letters to property owners of sites identified for potential rezoning with an overview of the Housing Element update process.

Stakeholder Interviews

In September and October 2022, interviews were conducted one-on-one via conference call and Zoom 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 interviews were conducted with 11 participants from 10 different organizations:

- Manufacturers Council of the Central Valley
- Center for Human Service

- West Modesto Collaborative
- Building Industry Association of the Greater Valley
- Resident (Grayson), Retired Behavioral Health Specialist
- Catholic Charities of the Diocese of Stockton
- Tuolumne River Trust
- Modesto Municipal Advisory Committee
- California Rural Legal Assistance
- Self Help Enterprises

After the consultants provided a brief project overview, stakeholders were encouraged to provide their thoughts on housing conditions and needs in the county. A summary of feedback is provided below:

Regional Housing Concerns

HOUSING AFFORDABILITY AND AVAILABILITY

- **Outside investment in housing stock contributes to affordability concerns.** Stakeholders expressed that investors and homebuyers from outside the community have contributed to rising housing prices countywide reducing the already limited availability of naturally-occurring affordable housing.
- **Housing to meet workforce demand is limited.** There is concern that there is not enough affordable workforce housing to meet new industry trends. Permanent farmworker housing is needed, and new industrial facilities, such as the Amazon facility opening in Turlock, will require more workforce housing than is currently available. Additionally, the student population of California State University (CSU) Stanislaus is expected to grow, increasing the demand for student housing.
- **Lack of diverse housing types in existing stock.** Most of the housing stock in the unincorporated county consists of single-family homes and mobile home parks. While there are some multifamily projects in the unincorporated county, the county's capacity for these projects is constrained by lacking sewer and water connections and the cost of additional improvements such as sidewalks, curbs, and gutters. Most new housing development consists of large homes rather than smaller for-sale units, limiting access to the housing market for moderate or lower-income households.

Vulnerable Populations:

- **Predatory home sales target seniors.** Many of the residents in the unincorporated communities have resided in those communities for generations and are now reaching retirement age or are passing homes down to family members. However, older residents are targeted by real estate investors to sell their homes for lower than market rate to increase profits for turnaround sales.

Community Development and Infrastructure

- **Incompatibility with surrounding agricultural land.** Some agricultural uses are being converted to small scale agricultural-industrial uses. Such uses have different needs, including trucking and transportation, that can cause adverse impacts on the surrounding community, such as pollution burden.
- **Lack of infrastructure and services to support affordable housing in rural areas.** Most development has occurred in or near the incorporated cities in Stanislaus County due to the

availability of public facilities, services, and employment opportunities. Affordable housing is not feasible in rural areas without available utility connections, transportation, and employment.

- **Lack of investment in rural communities.** Stakeholders expressed that some lower income, rural communities have lacked the level of investment seen in incorporated cities and wealthier neighborhoods in the county. Stakeholders stated that, in some cases, communities with higher percentages of people of color have received priority for infrastructure investment or consideration for annexation. Stakeholders express a desire for attention to be given to each community, how it is developed, and if the commercial and residential uses are compatible.
- **Lack of effective code enforcement.** Stakeholders report that there is a lack of effective code enforcement in the unincorporated county. Complaints related to code compliance (i.e., illegal dumping, land use infractions, squatters, environmental issues) may be initially investigated and cited, but little follow-up is done to ensure compliance has been reached. This is reported to be caused by limited County staff capacity and a lack of effective enforcement mechanisms.

Community Engagement and Services

- **Lack of community outreach.** Stakeholders felt that additional effort is needed to help inform and educate community members in the unincorporated areas on housing rights and housing assistance opportunities. Informational and financial resource information is scattered and hard to navigate. Stakeholders report that a central information hub would be highly valued.
- **Language Barriers.** Many households in the unincorporated areas of the county need materials translated to Spanish and online outreach in Spanish to be informed on housing issues and opportunities. Stakeholders expressed the importance of translation services in getting community members to participate.
- **Lack of transportation options.** Although there is bus service in the unincorporated county it is not dependable and does not have enough stops throughout communities to make it a reasonable alternative to cars. A lack of transportation options makes it difficult for people, especially seniors and people with disabilities, to get to work, school, local stores and markets, and community services.
- **Lack of services.** Some unincorporated areas of the county lack sufficient services such as afterschool programs, grocery stores, and banks.

Housing Needs

- **Need for housing rehabilitation.** Many of the units in the unincorporated county need rehabilitation, however, older long-term homeowners often cannot afford repairs. As a result, these homeowners often do not make the repairs at all or sell the property. Stakeholders felt that owners of rental units in disrepair are not motivated to rehabilitate substandard living conditions voluntarily due to high demand for rental units. Many tenants do not report these substandard living conditions out of fear of losing their housing through eviction or retaliation.
- **Need for transitional/supportive housing for residents experiencing homelessness.** Many people in the community experiencing homelessness generally live in parks, cars, or vacant lots. Many of these individuals suffer from severe mental illness and require mental health services and other social services. Although shelters exist in the area, many are waitlisted, and shelters do not work for all individuals. Additionally, services beyond emergency shelters (i.e., transitional/supportive housing) are inequitably distributed to white residents. Some stakeholders also expressed that homeless residents are often removed from higher income areas and pushed into low-income areas, where there is a slower response for clearing encampments.

- **Need for workforce housing.** It is difficult for living wage workers to find quality, safe, and affordable units. As a result, residents are living in large, often overcrowded, households or are paying more than 30 percent of their income on housing.
- **Need for affordable housing for seniors.** Many of the senior residents of Stanislaus County are on fixed incomes and struggle to find affordable housing. Many senior affordable housing facilities currently have waitlists. As mentioned earlier, lower-income senior homeowners struggle with the costs of home repairs and maintenance.
- **Need for housing to be located in proximity to jobs.** Many stakeholders expressed the need for affordable housing to be located near centers of employment. Due to a lack of affordable housing options many people are being forced to relocate to afford housing, pulling them further away from their jobs, communities, and basic services.
- **Need for park access.** Although there are parks in or near unincorporated communities, many stakeholders expressed that they are not always accessible due to illegal dumping, encampments, and maintenance issues such as lighting. Some stakeholders also expressed that the funds raised for parks and green space through development fees rarely materializes into park development or improvements.
- **Need for fair housing enforcement.** Stakeholders described cases of discrimination in housing towards undocumented persons, persons with disabilities, non-native English speakers, large households, and those with past experiences in the criminal justice system. Discrimination is usually in the form of not renting units to people who will need reasonable accommodation for a disability, charging higher rent for undocumented tenants, retaliating against or evicting tenants if complaints are made about substandard conditions, and turning away applicants outright based on a false assumption that lower-income residents are more prone to illicit or illegal activity.
- **Need for mobile home parks.** Mobile homes are typically a last resort before homelessness for many low-income residents. Some stakeholders commented that mobile home parks are coming into corporate ownership, and that these companies increase prices and displacement pressures on existing residents. Additionally, there are often titling issues with the mobile homes that allow park ownership to purchase the mobile home of a displaced resident at minimal cost, simply to resell it at a high price. Individuals residing in mobile home parks currently have few protections and need support and assistance (i.e., rent stabilization) to prevent homelessness.
- **Need for additional housing sites.** Stakeholders commented on the importance of identifying feasible sites for multifamily housing development that have access to utilities and sufficient allowed density. Sites without sufficient zoning (at least 20 dwelling unit per acre) and nearby utility connections are simply infeasible for affordable development and are not considered by developers. Additionally, it is important that sites identified for low-income housing are not concentrated in areas that already have a disproportionate share of low-income housing as this may exacerbate existing issues (communities identified by name include South Modesto and Crows Landing). Stakeholders expressed the need for more transparency in the site selection and evaluation process and expressed an interest in seeing data related to previously used sites, sites with by-right zoning, and site-specific income assumptions.

Constraints

INFRASTRUCTURE

- **Lack of Infrastructure.** Many areas within unincorporated Stanislaus County lack connections to utility lines such as water and sewer. Most sites in rural communities do not have sufficient utility

and transportation connections to support large multifamily developments. Connecting new utility lines is expensive, pricing out residents and disincentivizing developers from building in the unincorporated county. Many of the new infrastructure connections are to incorporated cities, and often requiring both upfront and recurring costs.

FINANCIAL AND ECONOMIC CHALLENGES

- **Cost of Development.** Land and construction costs have increased in recent years making it infeasible to build affordable housing units without government subsidies. Additionally, interest rates have increased in the last year, making it difficult and expensive to secure financing for development.
- **Cost of Entry.** There is a high cost of entry into the housing market. In many cases a household may be able to afford monthly rent or mortgage, but cannot meet the initial requirements for down payment, first and last month's rent, minimum credit score, or extensive rental history. The cost of entry is especially difficult for people on a fixed income, students, and undocumented individuals.

DEVELOPMENT REGULATIONS

- **Development Fees** Stakeholders expressed that fees associated with residential development disincentivize developers from building affordable housing. In Stanislaus County there is a farmland mitigation program that requires developers to pay for agricultural easements or pay an in-lieu fee to aid the loss of farmland. Unlike other development fees, developers have expressed that these fees are expensive and provide little benefit to the developer or tenants.
- **Zoning.** Stakeholders expressed that sites for lower-income capacity need to be zoned sufficiently to meet housing needs. Affordable housing developers expressed an interest in minimum density of 20-25 du/acre to be competitive for funding programs. Additionally, discretionary review processes are perceived as a constraint, and stakeholders expressed that by-right zoning for residential areas is key in attracting developers, especially for affordable housing.
- **Environmental Requirements for Industry.** Stakeholders report that State environmental regulations and requirements constrain industrial uses in the County, and that these constraints have led to companies leaving California altogether. This is especially true for the types of industry in Stanislaus County such as glass manufacturing, packaging, and molded plastics.

HOUSING ASSISTANCE SYSTEM

- **Coordinated Entry System.** The Coordinated Entry System (CES) was developed by the Stanislaus Community System of Care to coordinate the intake, assessment, and referral process within the HUD Continuum of Care (CoC) and Emergency Solutions Grants (ESG) program. The intent of CES is to act as a centralized database to connect people in need of housing assistance with housing providers (i.e., subsidies, vouchers, housing units, support services). Currently, to be eligible for CoC or ESG funded housing programs, individuals must be in the CES that assesses vulnerability, where the most vulnerable will be housed first. Some stakeholders felt this system is flawed and not always equitable. Additionally, due to long waitlists, it is difficult to get in touch with applicants when units become available because contact information changes frequently and some have moved.

Housing Opportunities

- **Accessory Dwelling Units (ADUs).** Stakeholders expressed that there is potential for ADUs as an affordable housing option and that county residents would be interested in both building ADUs and living in them. However, more information, education, and financial assistance is needed for homeowners to better understand the regulations, assistance programs, and costs involved in the construction of an ADU on their property.
- **Grant Funding.** There are grant funding opportunities for affordable and supportive housing, but developers, nonprofits, and government agencies need to work in collaboration to be informed of these opportunities and be more competitive to receive funding and implement programs. Several non-profit developers expressed interest in partnering with the County in pursuit of funding for affordable housing projects.
- **Programs for Prospective Homeowners.** Due to the gap in income and cost of living for most residents in the county, there is a need for programs that offer financial assistance to potential homebuyers. Potential programs might include a sweat equity homeownership program (in partnership with Self Help Enterprises), down payment assistance, or a mortgage credit certificate program.
- **Wrap Around Services.** There is a need for accessible wrap around services (i.e., education on budgeting, banking, housing rights, basic skills) on-site in housing developments with lower-income and special needs residents, particularly in emergency and transitional housing. Non-profit developers, such as Self-Help Enterprises, often contract for these services with local agencies to provide resources and case management to residents. Programs that provide access to resources, such as a shared car, are highly valued by residents.
- **Partnerships.** Stakeholders encouraged the County to pursue partnerships with local developers, nonprofits, regional agencies, both in the pursuit of grant funding and in providing education and outreach on housing issues and resources to the community.
- **Affordable By Design.** One stakeholder suggested that, rather than implement an inclusionary ordinance, the County should consider requiring that a percentage of units in multifamily projects are designed as smaller units that are more affordable by design.
- **Alternative Housing Options.** There are opportunities for alternative affordable housing options in Stanislaus County such as tiny home villages, rapid rehousing, multigenerational housing, or small unit sizes.
- **Proactive Rental Inspections.** Some stakeholders suggested that a proactive rental inspection program would help mitigate some of the substandard housing issues seen in the county. The program could be a County led effort, or partnership with local agencies, that keeps a registry of rental properties and performs random inspections to ensure rental units are up to code. This would alleviate some of the pressure from tenants to report substandard housing issues.
- **Community Education and Outreach.** Many stakeholders felt there was an opportunity for there to be greater collaboration between the County and nonprofit organizations to provide better community education resources about homeowner/tenant's rights, housing assistance, and community services. Many organizations have already compiled this information; however, it is difficult for people to know where to go for information about services and is rarely provided in multiple languages (Spanish, Hmong, Arabic). Some stakeholders also expressed that it would be beneficial to have a one stop shop to connect people to agencies and programs.
- **Anti-displacement Efforts.** Some stakeholders mentioned occurrences of residential areas being redeveloped into commercial uses without replacing the residential units elsewhere, leading to

the displacement of existing residents and a reduction in the county’s housing stock. There is an opportunity for the County to implement a program/policy that mitigates the impact that conversion to nonresidential uses may have on communities.

- **Program/Policy Accountability.** Some stakeholders expressed that although the County has developed aspirational housing policies and programs in previous housing elements, programs typically lack accountability, objectives, and specific timelines, or are never implemented. This leads to many residents feeling they do not experience the benefits of the County’s housing action plan. Developing policies and implementation measures that have more detailed goals, timelines, and roles of responsible parties can create more effective and transparent expectations for housing policy implementation.
- **HCD Pro-housing Designation.** The California Department of Housing and Community Development (HCD) launched the Pro-Housing Designation Program that provides additional points in the scoring of grant funding applications. Some stakeholders encouraged the County to pursue Pro-housing Designation to improve competitive funding applications.

Public Comment Survey

The County conducted a community housing needs survey from August 2 to August 15, 2022, to inform the Housing Element update. A variety of outreach efforts were conducted to encourage survey participation including posting on the project website, email blasts to stakeholders and interested parties, and social media posts on Instagram and Facebook. The survey consisted of 16 questions and used different formats for questions: checkbox, ranking, and open-ended questions. The survey was made available in both English and Spanish.

In addition to an online survey, the survey was made available in print form during various community outreach events. A total of 148 people responded to the survey: 117 in English and 31 in Spanish. The following themes were identified from the community survey:

- The highest priority housing need is lower-priced rentals and homes.
- The top three housing-related needs for the next 10 years are “housing that is affordable for all,” “more opportunities for home ownership,” and “more rental housing.”
- A desire for co-housing (housing with an emphasis on community living, i.e.: shared open spaces, or kitchens).
- The most urgent housing issue in the county is affordability of housing.
- Areas near public transit stops, employment, and shopping centers were selected as the most suitable for new housing development.
- The two most-needed fair housing services in their communities are landlord/tenant counseling and education/information on tenant rights.
- Respondents identified down payment assistance for lower-income first time homebuyers and home repair assistance for low-income homeowners as the most needed housing assistance services.

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. The participatory mapping exercise allowed participants to identify and rank potential housing opportunity sites. Input gathered through this activity informed the County’s site selection process.

The participatory mapping exercise involved a Geographic Information System (GIS)- based survey that was available from October 11 to November 1, 2022, on the project website. Notice of the survey was sent out via email lists to interested parties and was advertised on the County’s social media and website. The survey garnered 177 total responses, 27 of which were general comments and feedback on the sites inventory. The remaining 150 responses were made regarding 98 of the identified sites included in the site inventory. Survey input resulted in the following themes:

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

Project Website

A project website dedicated to the Housing Element update was created to provide information and solicit feedback. That site can be found here: <https://www.stancounty.com/planning/pl/general-plan.shtm>. The project website included background information on the Housing Element, information on upcoming events and engagement opportunities, answers to frequently asked questions, links to upcoming and past event materials, and links to articles and videos on the general plan topics. Project materials 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. There was also a sign-up form to receive project email updates and a comment function.

Housing Stanislaus Initiative

Housing Stanislaus is a countywide initiative to develop a unified and actionable vision and strategy framework for housing in Stanislaus County. County staff, along with Valley Vision, a non-profit civic leadership consulting firm, 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. Valley Vision conducted surveys and meetings 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. Outreach for Housing Stanislaus informed the Housing Element update involved input from 76 housing stakeholders including housing developers, engineers and architects, planners, community developers, building and public works staff, public housing advocates, financiers/funders, real estate professionals, property managers, employers, and community-based organizations. Five overarching themes emerged through these conversations included:

- Vocal community opposition to housing projects
- Regulations and procedures
- Limited land options stemming from lack of infrastructure and agricultural land conservation policies
- Market conditions and impact on development costs and return on investment
- Overburdened staff

This feedback was incorporated into policies and programs.

Individual Correspondence

The County had several one-on-one communications via meetings, calls, mail, and email correspondence with local community members and local jurisdictions. The feedback is summarized as follows.

City of Ceres

The County met with the City of Ceres Department of Planning to discuss the Housing Element sites located within the City's Sphere of Influence. The City did not have any objections to the four sites proposed for rezoning for higher density residential. The City did note that there were sites identified as "Additional Opportunity Sites" that would be taken in order to accommodate the proposed Service/99 interchange and should not be counted among the County's opportunity sites. The eminent domain proceedings are anticipated to begin next year. Additionally, there are two other properties that require small partial takes, including the southwest 0.01 acre of a site on Don Pedro, and the southern nine feet (0.03 acres) of a property on Service and Collins.

City of Oakdale

The County met with the City of Oakdale representatives to discuss the Housing Element site located within the City's Sphere of Influence, at 624 N. Stearns Road. The City's 2030 General Plan includes this property as "Future Specific Plan Area 8," but does not specify any land use designations for this property. Policy guidance suggests a potential for various housing opportunities and densities. Utility services such as water and sewer would be extended from just south of this property. However, the City did note that the City may need to rely on the site in question to achieve their own RHNA.

City of Modesto

The County reached out to the City of Modesto Planning Department to ask for input on sites within the Colorado/Rouse area, as the City is planning to annex the area in the future. The City provided the pre-zoned designations.

Xander Dev Co, LLC

An affordable housing developer reached out to the County to seek a list of sites to build 100 percent affordable multifamily housing. They suggested 624 N Stearns Rd in Oakdale as a potential site because it is in a high-resource area, which is important for affordable housing financing.

Local Constituents

Several local community members emailed voicing their concern regarding increased development leading to water shortages, traffic, air pollution, and nuisance to surrounding properties. One constituent argued that high density for the parcel between McHenry & Spy Glass Dr. (APN 004102005) would be inappropriate as it is far from retail and services, is not walkable, does not have sewage service, and is close to the environmentally sensitive Stanislaus River.

Stanislaus Union School District

Stanislaus Union School District wrote to the Planning Department raising concerns with school capacity and infrastructure to accommodate future growth. The district will continue to develop a ten-year plan to accommodate anticipated growth and asked for continued future partnership.

Property Owners

The County received a phone call from the property owners of one of the sites identified as a possible rezoning site. He asked about the project, and voiced supported inclusion of his property, as well as two additional properties. He also inquired about sewer service. The County provided an estimation of residential unit capacity.

Service Providers

The County reached out to the Keyes Community Services District, the City of Modesto Engineer, and to the Stanislaus County Local Agency Formation Commission to see if the sites identified in would be provided services. They all responded that they would be able to serve those parcels with water and sewer service.

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 19th, 2023. 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 Site 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 for integrating more housing in existing commercial areas
- Concerns about design and affordability of future housing
- Concerns about specific Site Inventory constraints

Equity Advisory Committee

To gather local expert-level knowledge and input on the Housing Element Update, an Equity Advisory Committee (EAC) will convene with five representatives of local and regional organizations. The purpose of the equity task force was 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
- Oak Valley Community Bank
- South Modesto Municipal Advisory Council
- Denair Municipal Advisory Council

A virtual EAC meeting is scheduled for early December, 2023. The intent of the meeting is to establish task force expectations, provide introductory information for the general plan and housing element, and discuss housing policies.

Public Review

Six comment letters were received during the public review period of August 31 to September 30, 2023. Copies of letters received are provided in this appendix. An overview of comments and how they were addressed in this draft are as follows:

- 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 the role of the City of Modesto’s Water Master Plan in the Salida Community Plan and clarified program language in Action 2-1g.
 - Clarified that existing regulations regarding manufactured home installation are consistent with state law.
- Housing Plan:
 - Removed an action in Program 2 regarding outreach to developers regarding new density bonus programs.

Attachment 1

Housing Element Survey Results

Housing Element Survey Results

The County conducted a community survey to inform the 6th Cycle Housing Element update. This summary memorandum presents the results and key findings from the survey responses.

Survey Marketing Summary

A variety of outreach efforts were conducted to encourage survey participation, creating another opportunity for community members to engage in the overall General Plan Update process, to contribute their ideas, respond to choices, and help shape the direction of policies and programs. Below are some of the outreach efforts used to bring the survey to the community:

- Stanislaus County website (<https://www.stancounty.com/planning/pl/housing-element.shtm>)
- Stanislaus County social media accounts including Facebook, Twitter, and Instagram.

Methodology

The survey questions were developed by the consultant team with key input from the Stanislaus County Planning & Community Development staff. The survey was released to the public online on date and remained open until date. The survey was also made available during various community outreach events. A total of 148 people responded to the survey.

Survey Format

The survey consisted of 16 questions and used different formats for questions: checkbox, ranking, and open-ended questions. The checkbox questions asked respondents to indicate their preference for answer options. The ranking questions asked respondents to rank answer options from most to least important. The survey was made available in both English and Spanish. A copy of the complete survey is included in the Appendix.

Survey Results

The survey was presented in electronic form (online), and it should be noted that responses received may not represent the entire population being queried. Since only a portion of the county population responded, results do not represent the views or preferences of the entire County. However, the survey results can provide a general sense of residents' priorities and visions for the county of the topic areas presented. Complete survey results are included in the Appendix.

Question 1: Rank the housing needs facing unincorporated Stanislaus County from highest priority (1) to lowest priority (10)

Question 1 asked respondents to rank a list of housing-related needs within unincorporated Stanislaus County. Scoring for the survey question was based on how highly each item was ranked by each individual. The highest possible score for an item was ten, meaning every respondent selected that item as the highest priority housing need, and the lowest possible score was one,

meaning every respondent selected that item as the lowest priority housing need. The resulting scores were the following, listed from highest to lowest in Table 1.

Table 1 Responses to Question 1

Rank	Current Housing Need	Score
1	Need housing choices in lower price range to rent	6.8
2	Need housing choices in lower price range to own	6.6
3	Need more housing for seniors	5.8
4	Need homes that are affordable to first-time homebuyers	5.4
5	Need housing for people who work here	5.0
6	Need more housing for large families	4.8
7	Need more housing for multiple-generation families	4.5
8	Need more variety of housing types	4.0
9	All housing needs are being met	2.2

Based on a total of 148 responses, the “need for lower-priced rentals” was the highest scoring item with a score of 6.78. The “need for lower-priced homes for purchase” was a close second with a score of 6.57, followed by “need for more housing for seniors,” with a score of 5.76, “affordable homes for first-time homebuyers,” with a score of 5.40, “housing for people who work locally,” with 4.98, “more housing for large families,” with 4.84, “housing for multiple generation families,” with 4.48, and “more variety of housing types,” with 3.95. The lowest scoring item was “All housing needs are being met,” with a score of 2.24.

Question 2: Select the top three housing needs for unincorporated Stanislaus County in the coming 10 years (check three)

Question 2 asked respondents to select the top three housing-related needs within unincorporated Stanislaus County in the coming ten years from a list of nine options. The highest possible score for an item was 100, meaning that every respondent had selected the item as one of the top three housing needs, and the lowest possible score was zero, meaning no respondent selected the item as one of the top three housing needs. The resulting scores were the following, listed from highest to lowest in Table 2.

Table 2 Responses to Question 2

Rank	Future Housing Need	Score
1	Housing that is affordable to all	67%
2	More opportunities for home ownership	63%
3	More rental housing	35%
4	Repairs to older deteriorating homes	33%
5	Accessible and wide range of housing types for our aging population	29%
6	Various housing types to appeal to different lifestyles	24%
7	Housing near transportation and/or services	24%
8	Housing for multigenerational households and large families	14%
9	Other (please specify)	12%

Based on a total of 148 responses, the need for “housing that is affordable to all” was the highest scoring item with a score of 66.9. The need for “more opportunities for home ownership” was a close second with a score of 62.8, followed by the need for “more rental housing,” with a score of 35.1, “repairs to older deteriorating homes,” with 33.1, “accessible and wide range of housing types for our aging population,” with 29.1, “various housing types to appeal to different lifestyles,” with 23.7, “housing near transportation and/or services,” with 23.7, and “housing for multigenerational households and large families,” with 14.2. 11.5 percent of respondents selected “Other” and entered custom responses which are listed in Table 3 below.

Table 3 Custom Responses to Question 2

Affordable rentals
Affordable Senior Housing
Casas de bajos recursos
Homes with better access to public utilities like water and sewer.
Housing for the unhoused
housing policy that discourages short term rental and commuter homes/keeps community members closer to home
Housing prices/rent controlled
Incentives/Lower Fees to help reduce building costs
more NEW TRAILER PARKS, perhaps IN DEL RIO AREA
remove homeless
Repair homes for elderly & disabled, install/repair A/C and heating units for elderly & disabled. Finally have ALL EMS personnel (private, city & county) check on all elderly & disabled citizens twice a month.
Sidewalks
smaller, cheap housing for singles just trying to survive (i.e. under \$300/mo)
sober living with program goal of independency

Question 3: Please rank each housing type based on what would be most successful in unincorporated Stanislaus County today (1 is most successful and 5 is least successful)

Question 3 asked respondents to rate 11 housing types on a scale from one to five based on which ones would be most successful in unincorporated Stanislaus County. The highest possible score for an item was five, meaning that every respondent ranked that housing type five out of five, and the lowest possible score was one, meaning that every respondent rated the housing type one out of five. The resulting scores were the following, listed from highest to lowest in Table 4.

Table 4 Results of Question 3

Rank	Most Successful Housing Types	Score
1	Co-housing (housing with an emphasis on community living i.e., shared open spaces, or kitchens)	3.6
2	Larger, custom homes	3.2
3	Single room occupancy (small apartment that may have a common kitchen)	3.1
4	Courtyard housing (housing arranged around a common courtyard)	2.9
5	Mid-rise (4-story) apartments	2.8
6	Micro-units (small studio apartments with full kitchens, Murphy beds (wall beds), drop-down surfaces like tables desks and more design features)	2.7
7	Accessory dwelling units (ADUs/second units/granny units/junior units)	2.6
8	Duplexes, triplexes, townhouses and low-rise multi-use buildings	2.3
9	Residential Care Facilities for Seniors or Persons with Disabilities	2.1
10	Single-story houses and condominiums	2.0
11	Senior housing allowing for aging in place (independent to assisted living) and meeting all income levels.	1.9

Respondents identified “co-housing” as the most potentially successful housing solution in unincorporated Stanislaus County with a score of 3.6 out of five. “Larger, custom homes” and “single room occupancy” homes with shared kitchens had similar scores with 3.2 and 3.1, respectively. Notably, single room occupancy apartments with common kitchens are similar to co-housing, suggesting respondents are open to housing options with common spaces. “Mid-rise apartments,” “micro-units,” and “accessory dwelling units” had comparable scores of 2.8, 2.7, and 2.6, respectively. The final four options all had similar ratings, notably all below 2.5 meaning that the survey respondents generally felt negatively towards them, with scores of 2.3, 2.1, 2, and 1.9.

Question 4: What do you believe are the most urgent housing issues in unincorporated Stanislaus County? (Rank the issues below with 1 being the most urgent)

Question 4 asked respondents to rank seven housing issues in unincorporated Stanislaus County in order from most to least urgent. The highest possible score for an item was seven, meaning that every respondent ranked the issue as the most urgent, and the lowest possible score was one, meaning that every respondent rated the issue as the least urgent. The resulting scores were the following, listed from highest to lowest in Table 5.

Table 5 Results of Question 4

Rank	Issue	Score
1	Affordability of housing	5.9
2	Availability of housing	5.5
3	Homelessness	4.8
4	Housing quality	3.5
5	Overcrowding	3.4
6	Fair housing/housing discrimination	3.3
7	There are no urgent housing issues	1.6

Respondents identified “affordability of housing” as the most urgent housing issue in the county by a significant margin with a score of 5.9 out of a possible seven. “Availability of housing,” which is connected with housing affordability, scored 5.5. “Homelessness” was identified as the third most urgent issue with a score of 4.8. Three subsequent issues scored less than 3.5, a significant drop from the top three: “Housing quality” scored 3.5, “overcrowding” scored 3.4, and “fair housing/housing discrimination” scored 3.3. Few respondents agreed that there are no urgent housing issues in the county, which scored 1.6.

Question 5: Using numbers from 1 through 6, with 1 being the best and 6 being the worst, please rank the areas where you believe housing should be developed in unincorporated Stanislaus County?

Question 5 asked respondents to rank six geographic categories based on their suitability for new housing. The highest possible score for an item was six, meaning that every respondent ranked the issue as most suitable for new housing, and the lowest possible score was one, meaning that every respondent rated the issue as the least suitable for housing. The resulting scores were the following, listed from highest to lowest in Table 6.

Table 6 Results of Question 5

Rank	Area Type	Score
1	Areas near public transit stops, employment, and shopping centers	4.80
2	Vacant Land on the edges of the cities and unincorporated communities	3.80
3	Areas with existing housing (increasing the number of units that could be built on each property such as with fourplexes, courtyard houses, and other types of apartment complexes)	3.52
4	Land that could be converted from commercial (office/store) to residential or mixed use (e.g., apartments or condominiums with ground floor stores or restaurants)	3.49
5	On existing single-family properties as accessory dwelling units (ADUs) or granny flats	3.00
6	Agricultural land on the edges of the cities and unincorporated communities	2.60

Respondents identified “areas near public transit stops, employment, and shopping centers” as the most suitable for new housing development by a significant margin with a score of 4.8. Respondents also indicated that “vacant land on the edges of the cities and unincorporated communities” was suitable for new housing with a score of 3.8. Respondents were mixed or indifferent towards increasing density within existing neighborhoods or commercial areas (3.52 and 3.49), and towards adding ADUs (3.0). Respondents generally considered agricultural lands as unideal options for new housing (2.6).

Question 6: Which fair housing services do you feel are most needed in our community? (Select all that apply)

Question 6 asked respondents to select fair housing services that were most needed in their communities and to suggest other relevant services. The highest possible score was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 7.

Table 7 Results of Question 6

Rank	Fair Housing Service	Score
1	Landlord/tenant counseling	68%
2	Education/information on tenant rights	65%
3	Promoting equal access to housing choice for all residents	51%
4	Assistance with filing a housing discrimination complaint	42%
5	Other (please specify)	18%

Respondents identified “landlord/tenant counseling” and “education/information on tenant rights” as the two most-needed services in their communities with similar scores of 68 percent and 65 percent respectively. About half of respondents selected “promoting equal access to housing choice for all residents,” and 42 percent selected “assistance with filing a housing discrimination complaint.” Eighteen percent of respondents selected “Other,” and left a total of 24 responses which are listed in Table 8 below.

Table 8 Custom Responses to Question 6

an entity to advocate for tenant rights that is free
money management courses
We don't have fair housing problems
legal assistance for those facing eviction
Assistance with Utilities since people can hardly afford rent
Everything is already "FAIR" Stop with the nonsense
get the DA on the case looking for red lining and criminal conspiracy to keep rentals off the market.
No drug dealers using section 8 housing
Help finding housing and filling out forms.
Access to rapid rehousing and at risk of homelessness issues with one time or short term subsidy
Landlord rights
1 website that contains all affordable housing in Stanislaus w/ requirements - clear
Landlord outreach and engagement
homeless removal
Managing/minimizing rent increases in the middle of a pandemic/recession. Not cool at all but it happens to so many people I know, including myself.
Ability to build homes affordably
Allowing citizens to file a complaint against a landlord slum on the County or City apps?
Stop giving the homeless a handout! No one ever helped my momma buy a home, or helped with repairs!!! She worked hard for 45+ years and never received a handout AND SHE DESERVED HELP!!!
RENT CONTROL
If someone pays rent on time for say 3 year period there should be a loan program/grant that takes that into consideration for first time home buyers.
Senior citizen advocates
Biased question
rental caps
Landlords maintenance of property

Question 7: Which housing assistance services do you feel are most needed in our community? (Select all that apply)

Question 7 asked respondents to identify housing assistance services that are most needed in their communities. The highest possible score was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 9.

Table 9 Results of Question 7

Rank	Housing Assistance Service	Score
1	Down payment assistance for lower-income first time homebuyers	61%
2	Home repair assistance for low-income homeowners	57%
3	Rental assistance	48%
4	Education seminars for aspiring homeowners	32%
5	Financial assistance to build an accessory dwelling unit	31%
6	Other	10%

Respondents identified “down payment assistance for lower-income first time homebuyers” and “home repair assistance for low-income homeowners” as the most needed services in their communities with scores of 61 percent and 57 percent respectively. Slightly less than half identified “rental assistance” as a most-needed service, and less than a third identified “education seminars for aspiring homeowners” or “financial assistance to build an accessory dwelling unit” as most-needed services. 10 percent of respondents selected “Other”. Respondents left a total of 13 comments which are listed in Table 10 below.

Table 10 Custom Responses to Question 7

I feel that there could be successful use of existing county/state owned structures and properties that would ease the issue of homelessness in this county, reduce costs of labor for cleanup and road crews, and assist individuals with development of self-efficacy.
Helping disabled and elderly find homes/apartments they can afford.
Programs for middle class as there is no help for them and is getting harder to find affordable housing.
Stop with the "permit" requirements for everything
local codes to help new Mobile Home Parks that are owned by those that live there like a co-op... maybe county is land lord the first few years to get it going.
Consistent help with finding and filling out forms.
Assist families w/ deposit assistance
Rental subsidies
Funding for improving infrastructure in existing communities
RENT CONTROL
Homeless Housing Assistance
Down payment assistance for mid-income buyers that do not own a home
Beautification of properties

Question 8: Which Accessory Dwelling Unit (ADU) assistance services are most important?

Question 8 asked respondents to select the most important ADU services from a list of six items or to suggest other assistance services. The highest possible score for each item was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 11.

Table 11 Results of Question 8

Rank	ADU Assistance Service	Score
1	Advice on what type of ADU will work best for your situation	47%
2	Financial assistance with construction expenses	44%
3	Educational “How To” Webinar series regarding financing, construction, and permitting process	40%
4	Pre-approved ADU floorplans	34%
5	Education on how to become a landlord	29%
6	Homeowner one-on-one consultations with an ADU expert	29%
7	Other	10%

Respondents identified “advice on what type of ADU will work best for your situation” as the most important service for aspiring ADUs owners with a score of 47 percent, followed by “financial assistance with construction expenses,” with a score of 44 percent and “educational “How To” Webinar series regarding financing, construction, and permitting process,” with a score of 40 percent. About a third of respondents selected “Pre-approved ADU floorplans,” “Education on how to become a landlord,” and “Homeowner one-on-one consultations with an ADU expert,” with scores of 34 percent, 29 percent, and 29 percents respectively. Ten percent of respondents selected “Other”, and respondents left a total of 13 individual comments which are listed below in Table 12.

Table 12 Custom Responses to Question 8

Only approved in areas that can handle population density.
NO ADU PERMITS
Should be not for rent.
Offering a different company other than PGE
how to keep the on street parking from being a problem.
Programs and grants available
Public facility fee, school and fire fee waivers
Granny apartments NOT for the homeless!
Don't think this is important
None of the Above
Accessory dwelling eco options, solar install incentives or charging ports for electric cars s, sola
Down payment assistance for mid-income buyers that do not own a home
Beautification of properties

Question 9: Would you be interested in developing an ADU (e.g. granny flat, in-law unit) on your property?

Question 9 surveyed respondents on their interest in developing an ADU. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed in Table 13 below.

Table 13 Results of Question 9

ADU Interest	Percent
Yes, on my existing or future property	39%
I already have an ADU on my property	1%
Not sure	20%
No	40%

Approximately 60 percent of respondents had at least some interest in building an ADU, while 40 percent of respondents did not. Only one respondent had already built an ADU on their property.

Question 10: Which best describes your current housing situation?

Question 10 asked respondents to identify their current housing ownership situation by selecting from a list of five options, or to select “Other” and enter a custom answer. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 14.

Table 14 Results of Question 10

Housing Situation (Own, Rent, or Other)	Percent
Own my house, condominium, apartment, or mobile home	64%
Rent a house, condominium, apartment, or mobile home	28%
Live with friends/family, do not own or pay rent	3%
Live with roommates/family and pay rent or assist with mortgage payments	4%
Live in emergency, transitional, or supportive housing	0%
Other	2%

The overwhelming majority of respondents owned their homes (64 percent). One third of respondents rent or assist another person with rent, and five percent of respondents are in some other living situation. Two custom responses were received and are listed in Table 15 below.

Table 15 Custom Responses to Question 10

Currently in HUD apartment after waiting 2 years.
family own home, I pay mortgage

Question 11: Which best describes your current living situation?

Question 11 asked respondents to identify their current housing companion situation by selecting from a list of six options, or to select “Other” and enter a custom answer. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed in Table 16 below.

Table 16 Results of Question 11

Housing Situation (Housing Companions)	Score
Live with spouse or significant other and children	45%
Live with spouse or significant other	22%
Multiple generations living together (adult children, parents, grandparents, etc.)	13%
Live alone	6%
Live with roommates	3%
Live with parents	1%
Other	10%

The overwhelming majority of respondents live with a family member with a total of 81 percent of responses. Six percent of respondents live alone, three percent live with roommates, and 10 percent selected “Other”. Respondents left 14 custom responses were received which are listed in Table 17 below.

Table 17 Custom Responses to Question 11

Parent. Children live with me, one is an adult in college
Live with minor child, no spouse
single parent with children
Live with child
Live w/ spouse, children, and elder parent
W/son
Single parent with two children
Single parent with dependent children
Just me and my two dogs, why complicate my life. LOL
Live with sibling
Single Father w/ child
Live with children
Single mother providing house for two children
Caring for older parent in my home

Question 12: Which of the following housing quality issues, if any, do you feel apply to your current living situation?

Question 12 asked respondents to identify housing quality issues from a list of six options plus an “Other” option. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 18.

Table 18 Results of Question 12

Rank	Housing Quality Issue	Score
1	None of the above	40%
2	Lack of energy efficiency	19%
3	Housing structural/maintenance issues	18%
4	Other	11%
5	Overcrowding within the household	5%
6	Lack of access to adequate plumbing	3%
7	Poor indoor air quality	3%
8	Lack of access to adequate kitchen facilities	1%

40 percent of respondents did not identify a housing quality issue, while another 37 percent identified either “lack of energy efficiency” or “housing structural/maintenance issues,” with scores of 19 percent, and 18 percent, respectively. “Overcrowding within the households,” lack of adequate plumbing,” “poor indoor air quality,” and “lack of access to adequate kitchen facilities” made up another 12 percent of responses. 11 percent of respondents selected “Other”, and left 13 custom answers which are listed in Table 19 below.

Table 19 Custom Responses to Question 12

Cost of PGE
could really use a ADU, my mother has a deteriorating chronic condition, we love our small home and don't want to give it up but having her onsite would address potential future safety issues. My father-in-law is going through a serious medical issue and we don't fill we have enough space to invite him to come stay until things stabilize.
Espacio de casa muy chica y renta muy costosa ayúdenme por favor soy padre de 2 hijas y mi esposa no trabaja yo pago todos los gastos y me quedo sin dinero durante 15 días ayuda por favor
homeless are contaminating rivers, well water
Lack of access to adequate plumbing, poor indoor air quality, housing structural/maintenance issues, lack of energy efficiency
lack of clean air from all the 'harvest dust' unequal access to water.
Lack of space and affordability
Las calles no tienen banquetas y se ase mucho cochinerero
multiple issues, but livable. most concern is pest control, structural concerns, consistent plumbing issues
Permit fees
poor access to public transit and city services, no walkability
The roads on my side of town have been neglected for decades
Updating (1955 House)

Question 13: Which type of housing do you currently occupy?

Question 12 asked respondents to identify their current housing type. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 20.

Table 20 Results of Question 13

Rank	Current Housing Type	Score
1	Single-family home	72%
2	Condominium/Townhome	7%
3	Apartment	6%
4	Duplex/triplex	5%
5	Other	4%
6	Mobile home	3%
7	I do not currently have a permanent home	1%
8	Co-op housing	1%
9	ADU	1%
10	Group home/assisted living	0%

The overwhelming majority of respondents live in single-family homes with 72 percent, while the remaining respondents live in a variety of multi-family homes. One respondent lives in an ADU, and two respondents do not currently have permanent homes. Four percent of respondents selected “Other”, and left a total of 13 custom responses which are listed below in Table 21.

Table 21 Custom Responses to Question 13

Apartamento
No aplica
Casa
Casa
No ocupo
Casa pequeña tipo estudio
Updating (1955 House)
Lack of access to adequate plumbing, poor indoor air quality, housing structural/maintenance issues, lack of energy efficiency
Permit fees
Lack of space and affordability
poor access to public transit and city services, no walkability
Espacio de casa muy chica y renta muy costosa ayúdenme por favor soy padre de 2 hijas y mi esposa no trabaja yo pago todos los gastos y me quedo sin dinero durante 15 días ayuda por favor
Las calles no tienen banquetas y se ase mucho cochinerero

Question 14: Optional: What is your total household income?

Question 14 asked respondents to identify their household income level. The results are listed in Table 22 below.

Table 22 Results of Question 13

Household Income Level	Score
\$100,000+	25%
\$50,000 to \$74,000	19%
\$75,000 to \$99,999	18%
\$25,000 to \$49,000	16%
Decline to state	12%
Less than \$25,000	10%

Question 15: Let us know if there is anything we missed! Below, provide other comments you would like to make pertaining to housing issues, housing types, or the provision of housing in Stanislaus County.

Question 15 was a call for open-ended answers. A total of 44 custom responses were received, and are listed below in Table 23.

Table 23 Answer for Question 15

Más acceso a las viviendas
the continued acceptance of higher rent rates is growing in our area, which will undoubtedly lead to higher numbers of homeless in the area. Making use of county/state-owned buildings, properties, and land, and converting them into housing /programs could benefit the area.
Salida and other unincorporated areas should not shoulder the responsibility of low income housing. Bad rentals are a major problem.
When social security income is raised, please do not raise HUD/Assistance rental amounts too much.
Para la case media, que ayuda nos pueden asistir , ya que no calificó para ningún servicio público !
Que sean mas accesibles sin nevesidad de un seguro
K las rentas bajen están muy caras
Ayuda para comprar casa por primera vez a personas que ganan 18 dólares la hora por favor soy padre de 2 hijas y esposo, no me alcanza el dinero y no bebo alcoho ni fumo no tengo vicios, soy trabajador pero me pagan poco.
I'm more concerned about the fact that people dump trash all over the area. How about finding a solution for that because it's unsanitary.
I am for Rental assistance for homeless families who are working and can't find affordable rentals. As a taxpayer I feel that there needs to be assistance/rehab for homeless to gain job training- if they can show they obey the law and be a part of the working members society to gain assistance.
Sidewalks
Need help removing inground pool due to high cost of maintenance and deteriorating pipes
Some people don't care about having all the utility amenities, they just want a cheap space of their own with a locking door, the county restrictions for landlords make this type of affordable option illegal to provide. Also trash removal from homeless/people living in vehicle, falls on landowner/homeowner, and this is not fair when the county makes evicting people such a difficult & time consuming process.
Middle class gets no breaks.
Speed up approval process

Stanislaus County
2023-2031 Housing Element Update

Bus out all homeless and liberals.

Need one or more questions about living in a community of non traditional units such as a small home community that consists of mostly factory built/prefab units of no more than 900 sq ft. These would be new 'mobile home' type parks.

Horizontal mixed-use zoning of areas targeted for housing development could be helpful.

you completely missed the lower rung steps of owning a home here in plantation country the "Mobile Home Parks"

We need police and sidewalks.

Number one issue is the substance abuse and mentally ill. Need safe sober program housing with 24 hour security, possibly locked facilities. We often see vulnerable people who clearly cannot care for themselves that are often violated as they are easy targets.

Access to safe drinking water. Education on land use/septic systems.

Transitioning less desirable neighborhoods into desirable neighborhoods would be a positive in Stanislaus County. Parks need to be cleaned up, maintained, and have security so kids can actually play at them. I wish the county would stop allowing more shopping centers to be built and leaving other ones vacant, and I wish the county would have a plan of action in regards to homelessness by building more housing for them in parts of the county and not allowing tents to be plopped up everywhere and anywhere.

Families might be best supported if job, child care and housing were taken in consideration at the same time. Parents want to provide for their children but these 3 things tend to be connected. One w/o the other makes it hard to thrive in this community.

Revisit the base line income for low income housing it's awful low there are potential homeowners left out as they are not considered low income . They fall between the gap.

Based on income- There should be a question related to whether individuals are spending more than half of their monthly after-tax income on housing payments or rent. The reality is if a person makes under \$50,000 per year, they are spending approx. 3/4 of their income on a 2-bedroom home or apartment in most cases. The problem is all of these things but also how to ensure people are not living paycheck to paycheck thus causing a family to become homeless when an emergency occurs.

homeless are really becoming an issue next to the VFW. Very poor conditions. Violent, trespassing, theft, unsanitary, noisy, drugs/drug paraphernalia. Please keep the area clean and a nice place to live-remove them. it is not safe or my children or elders. even on our own property we come face to face, very scary. Please start with homeless removal before any development plans. Homes are being robbed as it is. cant imagine all the theft on a jobsite nearby. thanks.

State mandates for new housing will continue to make housing less affordable in CA.

I think that landlords need to be held better accountable for not being good landlords. For example, I've been paying rent at my place of residence for over 10 years now. Out of the 10 years, my shower in my bathroom is basically falling through the floor leaving it un-useable. I have not used my shower in my bedroom for over two years because my landlord says "I have not been able to find anyone who can repair that. COVID has made contractors/repair men less available". Can you believe that? So essentially I've been paying for a bathroom I CANNOT USE! Plus, the rent has increased. How is this fair?

Education for homeowners on how to find the right contractor, landscaper, plumber, electrician, etc.

I teach college. My students are having trouble finding places to live with affordable rents. This even applies to my students who are graduates with teaching jobs. They can barely afford their rent, even though they are working full time. The option to buy a home should be open to all essential workers!!

A HUGE overhaul of the Housing Authority is needed - a in-depth audit of all units such as: how many years has a family lived in a unit? when was the last time the applicant's application was reviewed? Considering implementing a limit on the years a unit is occupied, because I know of families who decades later are still living in the same units.... basically milking the system while our homeless families and veterans struggle. The reviews on Google should be a HUGE indicator of the ongoing issues at the Housing Authority - see below. Housing Authority of Stanislaus County 1701 Robertson Rd, Modesto, CA 2.7 (OUT OF 5.00, THIS IS A VERY LOW SCORE) 71 reviews

Buckle down, and enforce the homeless laws! Do not allow homeless to set up "tent cities" or live in their vehicle!!! The biohazards and health hazards the homeless create are so overwhelming in our once beautiful county! As a result of the homeless, living wherever they want, all I see is garbage & trash heaps, land deterioration, areas in downtown where homeless have openly defecated in flowerbeds! Our community is not a open toilet, or rubble pile! We are a family oriented community with hard working families and children to raise! Children and adults alike should NOT be subjected

to seeing filth, squaller, and makeshift “homes” because transients refuse to abide by simple regulations, rules and laws!!! I can go on..... however I’m sure I’ve made my statement clear, and I don’t stand alone!!!

Rent costs are not equivalent to the current income guidelines for people in rural areas.

More Questions about Homeless Suggestions

I think that if anyone pays rent, always on time and paid in full that there should be programs that take that into consideration for buying their own home. Rent often times is higher than a mortgage. If someone is consistently paying rent that is high, then why shouldn’t that be considered on a loan application? Makes no sense.

I would like to see more affordable housing options available (Rent/Own) within the county. I would like to see both high end and lower income Apartment/Condominium units become available in the county. Higher density, smaller, affordable units.

Community oriented solar/charging incentives for unincorporated homes. Were limited to only statewide option, the ones without city backed options

Zoning violations and non-permit building common in my area.

Housing for homeless - convert abandoned motels, make tiny home (like mobile home parks) for homeless. Affordable spaces that they can live in, that do not create the issues "homeless camps" along streets/highways do.

Home ownership incentives for new/existing homeowners purchasing homes within 30 miles of their workplace, keeping residents local.

Instead of allowing people to take advantage of the services when they don’t need them they should expire. So many people are getting help with housing, food, etc. and taking advantage and will do this for the remainder of their lives and then their kids will do the same. Make an expiration date and make people get jobs and help the people that really need it but can’t get it due to the people taking advantage. Most of these people are living beyond the means of two working parents.

Rent is unaffordable and increasing the max every year Too hard to buy a house can't save money

Deal with slumlords and dilapidated housing

Question 16: Please identify which part of unincorporated Stanislaus County you identify with as your residence

Question 16 asked respondents to select their community from a list of 23 unincorporated communities in Stanislaus County, as well as offering an “Other” option. The results are listed below in Table 24.

Table 24 Results for Question 16

Community	Total % of Respondents
Other	33%
West Modesto	24%
Salida	8%
South Turlock	7%
Denair	6%
Empire	5%
Crows Landing	5%
North Ceres	3%
South Ceres	2%
Airport	2%
Bret Harte	2%
Valley Home	2%
Hickman	1%
Knights Ferry	1%
Westley	1%
Cowan Tract	0%
Del Rio	0%
Diablo Grande	0%
Grayson	0%
Keyes	0%
La Grange	0%
Monterey Park	0%
Riverdale Park	0%
Parklawn	0%

A total of 36 custom responses were received and are listed below in Table 25.

Table 25 Custom Responses for Question 16

NE Modesto
South East Modesto
Modesto
I work in Stanislaus County with Seniors & Homeless, I live outside the county
n/a not near unincorporated. area, but own rentals in the Airport area.
north east Modesto
Riverbank
Riverbank
Oakdale
Live in Modesto
Between Oakdale and Riverbank
not an unincorporated resident
City of Modesto
Newman
Hughson
Northeast Modesto
North East Modesto
Newman
Riverbank area
We live in North East off Scenic Dr
Oakdale
Waterford
Oakdale
East Modesto
Woodland West
Downtown Modesto/College Area
Village One
East of Modesto
Oakdale
Scenic dr.
Modesto
Don't live in unincorporated area
Riverbank
Turlock
Modesto
Ceres

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Attachment 2

Stanislaus County Housing Element Update Survey

Stanislaus County Housing Element Update Survey

What are our Housing Element Issues and Opportunities?

Stanislaus County is preparing an update to the General Plan Housing Element. The Housing Element includes the County’s housing goals and policies for the 2023-2031 planning period. The County’s Housing Element covers only the unincorporated areas and does not include areas located within a city.

Housing issues affect the entire community — renters, homeowners, employers who are seeking to hire and retain workers, and community members with special housing needs. The purpose of this survey is to identify any unique housing issues in the unincorporated areas of Stanislaus County to assist County staff to craft solutions that meet the needs of everyone in the community.

This confidential survey asks your opinions about current housing conditions, unique housing opportunities that can influence future housing in Stanislaus County, and yourself. The County will use your responses to better understand and respond to the community’s sentiments about future housing growth. All input will remain anonymous.

1. Rank the housing needs facing unincorporated Stanislaus County from highest priority (1) to lowest priority (10):

- Need housing choices in lower price range to rent
- Need housing choices in lower price range to own
- Need more housing for seniors
- Need more housing for large families
- Need more housing for multiple-generation families
- Need homes that are affordable to first-time homebuyers
- Need housing for people who work here
- Need more variety of housing types
- All housing needs are being met
- Other (please specify)

2. Select the top three housing needs for unincorporated Stanislaus County in the coming 10 years (check three):

- Housing that is affordable to all
- Repairs to older deteriorating homes
- Accessible and wide range of housing types for our aging population
- Housing near transportation and/or services
- Various housing types to appeal to different lifestyles
- Housing for multigenerational households and large families
- More opportunities for home ownership
- More rental housing
- Other (please specify)

3. Please rank each housing type based on what would be most successful in unincorporated Stanislaus County today (1 is most successful and 5 is least successful):

Housing Type	Most Successful	Least Successful
Accessory dwelling units (ADUs/second units/granny units/junior units)		
Co-housing (housing with an emphasis on community living ie: shared open spaces, or kitchens)		
Courtyard housing (housing arranged around a common courtyard)		
Micro-units (small studio apartments with full kitchens, Murphy beds(wall beds), drop-down surfaces like tables or desks and more design features)		
Single room occupancy (small apartment that may have a common kitchen)		
Mid-rise (4-story) apartments		
Duplexes, triplexes, townhouses and low-rise multi-use buildings		
Residential Care Facilities for Seniors or Persons with Disabilities		
Larger, custom homes		
Single story houses and condominiums		
Senior housing allowing for aging in place (independent to assisted living) and meeting all income levels.		

4. What do you believe are the most urgent housing issues in unincorporated Stanislaus County? (Rank the issues below with 1 being the most urgent)

- Affordability of housing
- Availability of housing
- Homelessness
- Overcrowding
- Fair housing/housing discrimination
- Housing quality
- There are no urgent housing issues
- Other (please specify)

5. Using numbers from 1 through 6, with 1 being the best and 6 being the worst, please rank the areas where you believe housing should be developed in unincorporated Stanislaus County:

- Areas near public transit stops, employment, and shopping centers
- Agricultural land on the edges of the cities and unincorporated communities
- Vacant Land on the edges of the cities and unincorporated communities

- Areas with existing housing (increasing the number of units that could be built on each property such as with fourplexes, courtyard houses, and other types of apartment complexes)
 - On existing single-family properties as accessory dwelling units (ADUs) or granny flats
 - Land that could be converted from commercial (office/store) to residential or mixed use (e.g., apartments or condominiums with ground floor stores or restaurants)
6. **Which fair housing services do you feel are most needed in our community? (Select all that apply)**
- Landlord/tenant counseling
 - Education/information on tenant rights
 - Promoting equal access to housing choice for all residents
 - Assistance with filing a housing discrimination complaint
 - Other (please specify)
7. **Which housing assistance services do you feel are most needed in our community? (Select all that apply)**
- Home repair assistance for low-income homeowners
 - Rental assistance
 - Education seminars for aspiring homeowners
 - Financial assistance to build an accessory dwelling unit
 - Down payment assistance for lower-income first time homebuyers
 - Other (please specify)
8. **Which Accessory Dwelling Unit (ADU) assistance services are most important?**
- Pre-approved ADU floorplans
 - Educational “How To” Webinar series regarding financing, construction, and permitting process
 - Homeowner one-on-one consultations with an ADU expert
 - Financial assistance with construction expenses
 - Education on how to become a landlord
 - Advice on what type of ADU will work best for your situation
 - Other (please specify)
9. **Would you be interested in developing an ADU (e.g. granny flat, in-law unit) on your property?**
- Yes, on my existing or future property
 - No
 - Not sure
 - I already have an ADU on my property

10. Which best describes your current housing situation?

- Own my house, condominium, apartment, or mobile home
- Rent a house, condominium, apartment, or mobile home
- Live with friends/family, do not own or pay rent
- Live with roommates/family and pay rent or assist with mortgage payments
- Live in emergency, transitional, or supportive housing
- Other (please specify)

11. Which best describes your current living situation?

- Live alone
- Live with roommates
- Live with spouse or significant other
- Live with spouse or significant other and children
- Live with parents
- Multiple generations living together (adult children, parents, grandparents, etc.)
- Other (please specify)

12. Which of the following housing quality issues, if any, do you feel apply to your current living situation?

- Lack of access to adequate plumbing
- Lack of access to adequate kitchen facilities
- Poor indoor air quality
- Overcrowding within the household
- Housing structural/maintenance issues
- Lack of energy efficiency
- Other (please specify)
- None of the above

13. Which type of housing do you currently occupy?

- ADU
- Apartment
- Condominium/townhome
- Co-op housing
- Duplex/triplex
- Group home/assisted living
- Mobile home
- Single-family home
- I do not currently have a permanent home
- Other (please specify)

14. Optional: What is your total household income:

- Less than \$25,000
- \$25,000 to \$49,000
- \$50,000 to \$74,000
- \$75,000 to \$99,999
- \$100,000+
- Decline to state

15. Let us know if there is anything we missed! Below, provide other comments you would like to make pertaining to housing issues, housing types, or the provision of housing in Stanislaus County.

16. Please identify which part of unincorporated Stanislaus County you identify with as your residence:

- Airport
- Bret Harte
- Cowan Tract
- Crows Landing
- Del Rio
- Denair
- Diablo Grande
- Empire
- Grayson
- Hickman
- Keyes
- Knights Ferry
- La Grange
- Monterey Park
- North Ceres
- Riverdale Park
- Salida
- Parklawn
- South Ceres
- South Turlock
- Valley Home
- Westley
- West Modesto
- Other

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Attachment 3

Community Engagement Materials

2023-2031 Housing Element Update

Welcome!

Stanislaus County has kicked off an update to the Housing Element to plan for housing through 2031. The update is scheduled for completion at the end of 2023, and throughout the process, we invite the public to be part of the planning process and provide input on how Stanislaus County can support housing development over the planning period (2023-2031).

What is a Housing Element?

The purpose of the Housing Element is to identify and analyze existing and projected housing needs to support housing preservation, improvement, and development for all economic segments of the community.

What other elements are being updated? Why?

As part of the Project, the County will be conducting a technical update to the 2015 Stanislaus County General Plan with an update of the Safety Element and preparation of Environmental Justice policies.

Environmental Justice Element

Senate Bill 1000 (Leyva, 2016) amended Government Code Section 65302 to require that California cities and counties that have disadvantaged communities incorporate Environmental Justice policies into their general plans. The purpose of the law is to address the “unique or compounded health risks” in disadvantaged communities by decreasing pollution exposure, increasing community assets, and improving overall health. The Environmental Justice Element will:

- Address goals, policies, and programs pertaining to educational attainment, pollution burden of disadvantaged communities, and identification of burdensome quality of life metrics including poverty, unemployment, linguistic isolation, and health.
- Align with the Governor’s Office of Planning and Research Guidelines for Environmental Justice
- Rely on CalEnviroScreen 4.0 to determine areas of concern regarding environmental justice issues.

Safety Element Update

The Safety Element identifies and includes policies and programs to reduce the impact of natural and man-made hazards that may threaten the health, safety, and property of Stanislaus County residents, business owners, and visitors. The State of California General Plan Guidelines state that the aim of the Safety Element is to reduce the potential risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, earthquakes, landslides, and other hazards. The Safety Element Update will:

- Ensure consistency with other General Plan elements
- Ensure compliance with State law
- Incorporate information from the Draft 2022 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, with an understanding that the existing plan is currently in the update process
- Address AB 747, General Plan Safety Elements; SB 99, Safety Elements, Emergency Evacuation Routes; SB 379, Climate Adaptation and Resiliency; SB 1035, General Plans; and SB 1241, Fire Hazard Impacts.

2023-2031 Housing Element Update

Meeting Our Housing Goals

What is the Regional Housing Needs Allocation?

In the process of updating the Housing Element, each jurisdiction, city, and county is required to accommodate its fair share of the regional housing need. The Regional Housing Needs Allocation (RHNA) is the process used to determine housing allocations for each jurisdiction. As part of the RHNA, HCD determines the total number of housing units needed across California over the next decade. The Stanislaus Council of Governments (StanCOG) is then tasked with developing a methodology to determine the number of housing units for each incorporated and unincorporated jurisdiction in Stanislaus County, which is required to provide sites for housing. Under State law, the RHNA is assigned to the following four income categories which are based on a percentage of the Area Median Income (AMI):

- Very Low Household Income (<50% AMI)
- Low Household Income (51-80% AMI)
- Moderate Household Income (81-120% AMI)
- Above Moderate Household Income (>120% AMI)

In August 2022, StanCOG updated their methodology for RHNA allocations for each city in the county and for the unincorporated county. The table below shows the RHNA goals assigned to each jurisdiction. Stanislaus County is responsible for the RHNA requirement related to the unincorporated county. As shown, the County must provide for residential capacity through zoning to accommodate 2,475 new units, including 574 very low-income units and 398 low-income units. To meet very low- and low-income unit goals, the County must identify sites adequate for residential development that allow for development at 20 dwelling units per acre.

Cycle 6 Final Adopted Methodology Summary Table

Jurisdiction	Lower Income Units				Higher Income Units		Total RHNA
	Very Low	Low	Very Low + Low	% of Total RHNA	Moderate	Above Moderate	
Ceres	706	489	1,195	35.6%	661	1,505	3,361
Hughson	284	196	480	54.5%	122	279	881
Modesto	2,807	1,943	4,750	42.2%	1,981	4,517	11,248
Newman	197	136	333	31.8%	218	497	1,048
Oakdale	414	286	700	42.0%	294	671	1,665
Patterson	1,046	724	1,770	47.6%	593	1,353	3,716
Riverbank	970	672	1,642	45.7%	594	1,355	3,591
Turlock	1,305	903	2,208	38.1%	1,096	2,498	5,802
Waterford	107	74	181	32.5%	115	261	557
Unincorporated County	574	398	972	39.3%	458	1,045	2,475
Total	8,410	5,821	14,231	41.4%	6,132	13,981	34,344



2023-2031 Housing Element Update

The Sites Inventory Process

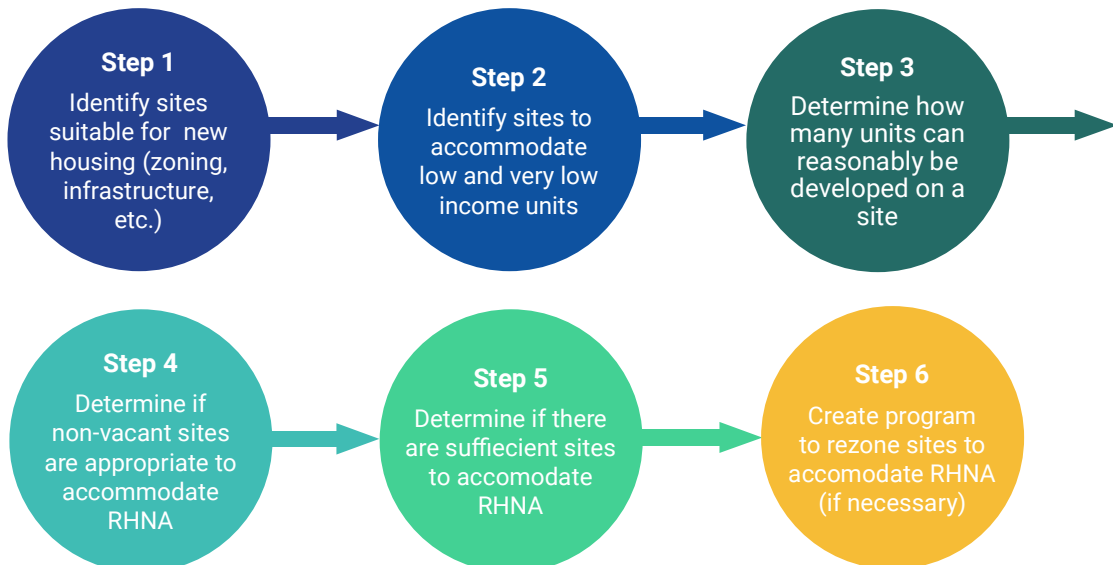
The site inventory is a required component of the Housing Element used to identify specific sites to meet the RHNA allocation for the unincorporated county. The sites inventory process is a labor-intensive and potentially controversial component of the Housing Element Update. Stanislaus County will need to evaluate General Plan land uses and the zoning code to determine whether there is enough land available to accommodate the assigned RHNA allocation for each income category. If unable to accommodate the RHNA, the County will need to plan to rezone enough land to meet the RHNA obligation.

Sites or credits in the inventory can include:

- Housing projects under review or approved through Planning and expected to be built during the planning period
- ADU trends
- County-owned sites with housing in line with County goals
- Residentially zoned vacant sites or non-vacant sites with redevelopment potential
- Sites that would be rezoned to permit residential uses or higher density

Site considerations:

- Environmental constraints and utility access
- Redevelopment potential/feasibility
- Sites identified for lower income must meet density and site requirements
 - » Appropriate density: 20 units per acre
 - » Appropriate parcel size: between 0.5 and 10 acres
 - » Access to high performing schools, jobs, amenities (i.e., parks and services), health care facilities, and grocery stores



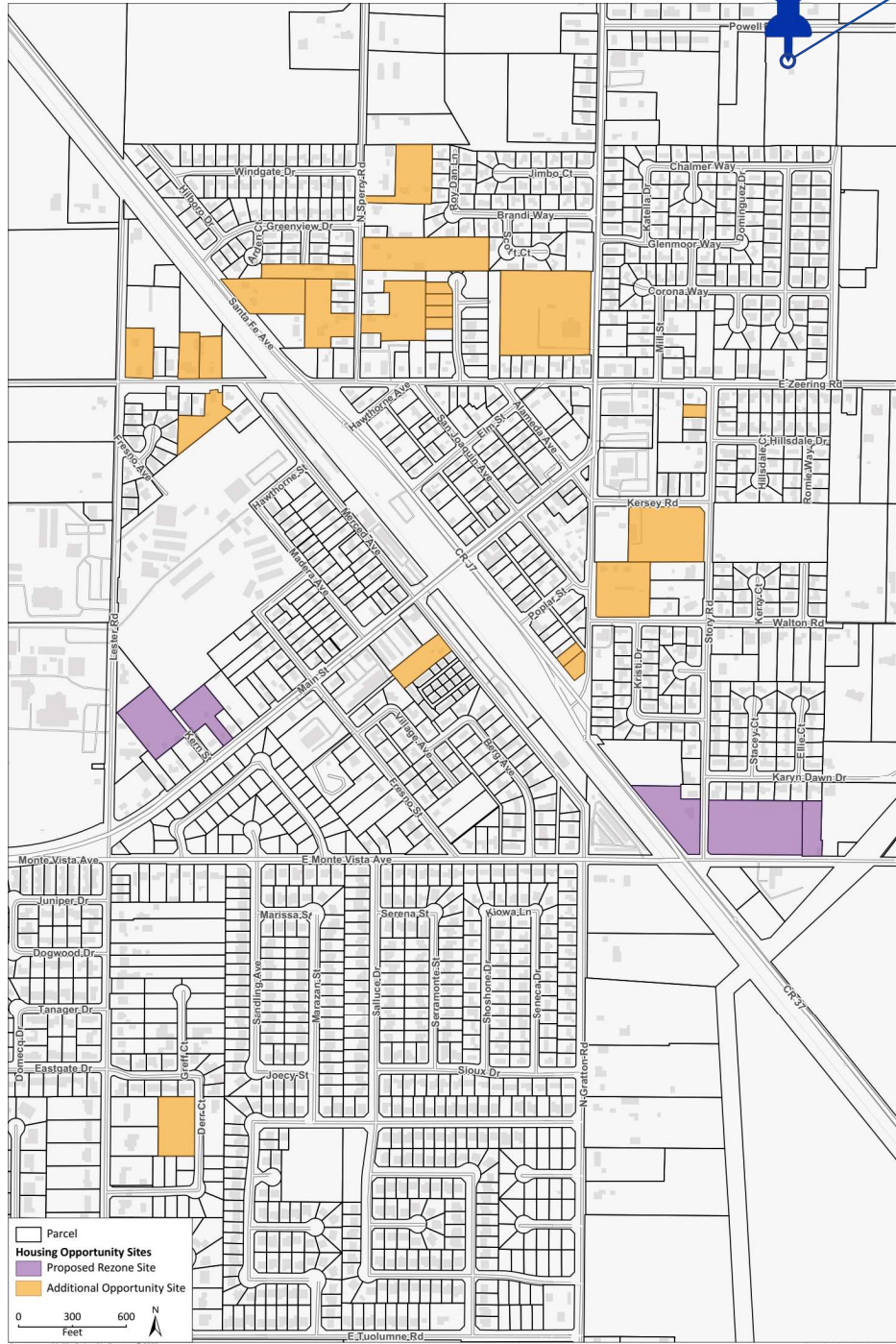
2023-2031 Housing Element Update

Where should new housing be built in Denair?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



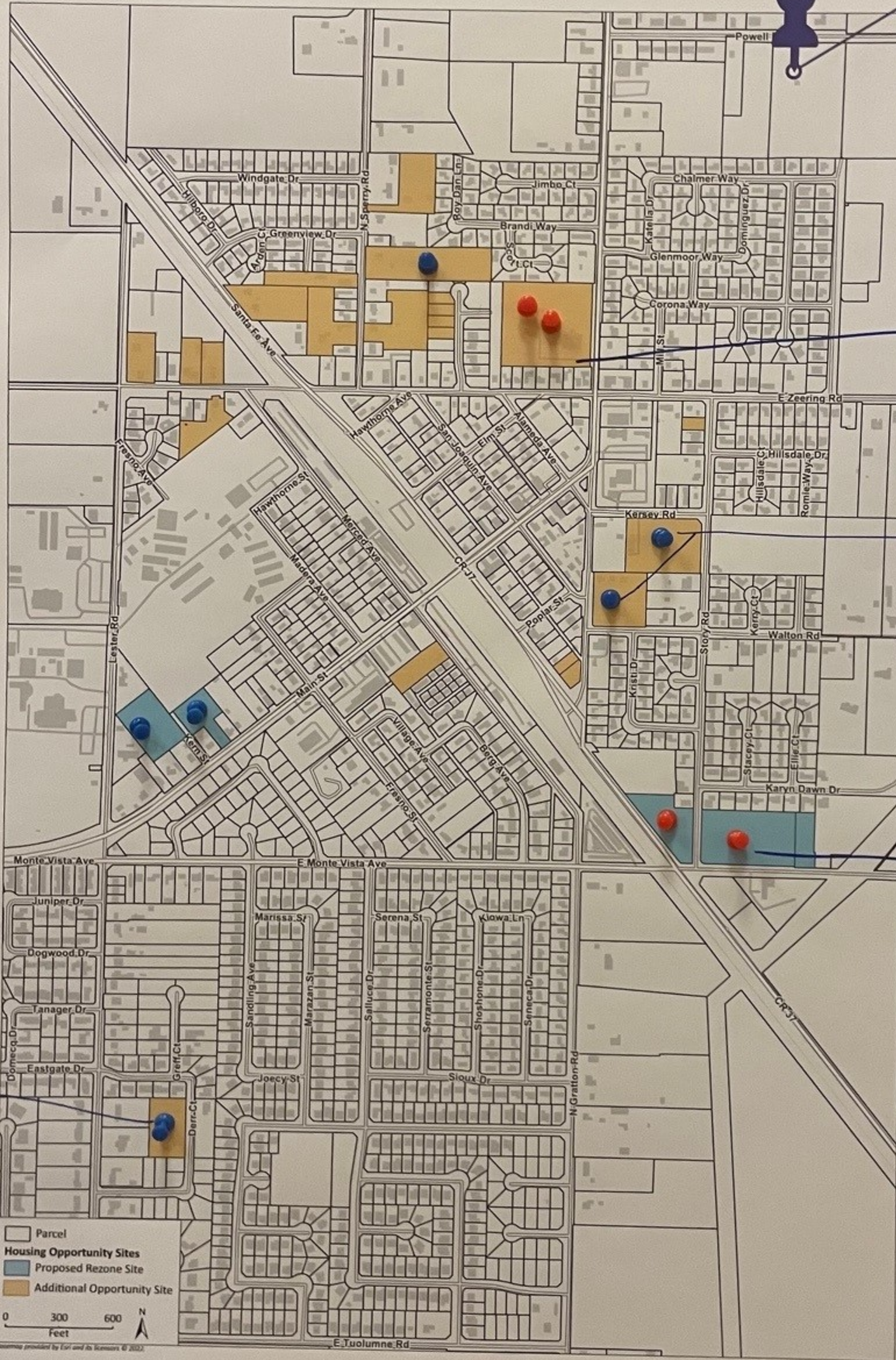
2023-2031 Housing Element Update

Where should new housing be built in Denair?

Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!

Accessible to Amtrak station as expansion completes



Existing church site

Kim - good in-fill near center of town (library, PO, etc.)

Traffic concerns

Kim - Good in-fill near other houses and main thoroughfare

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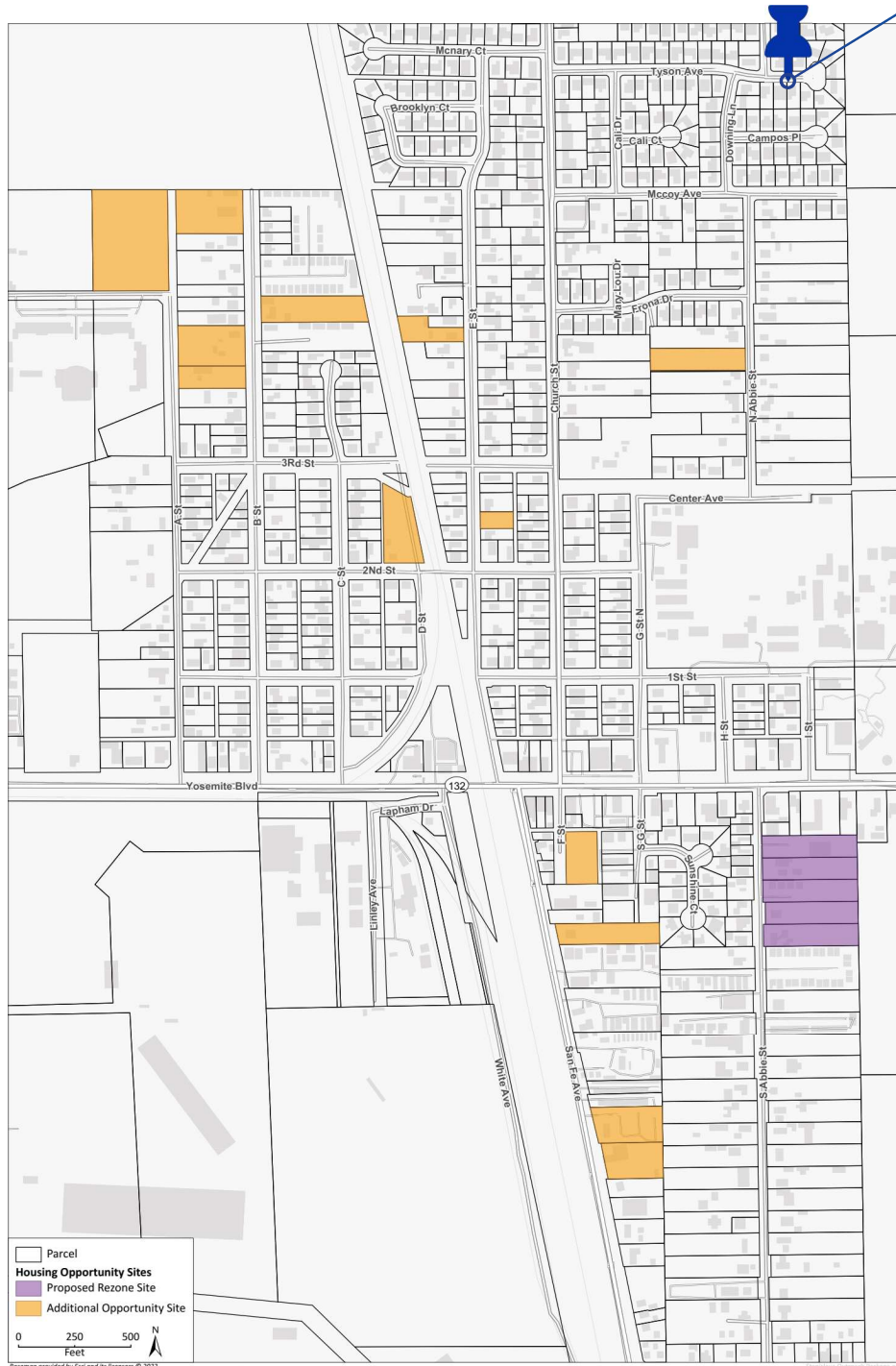
2023-2031 Housing Element Update

Where should new housing be built in Empire?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



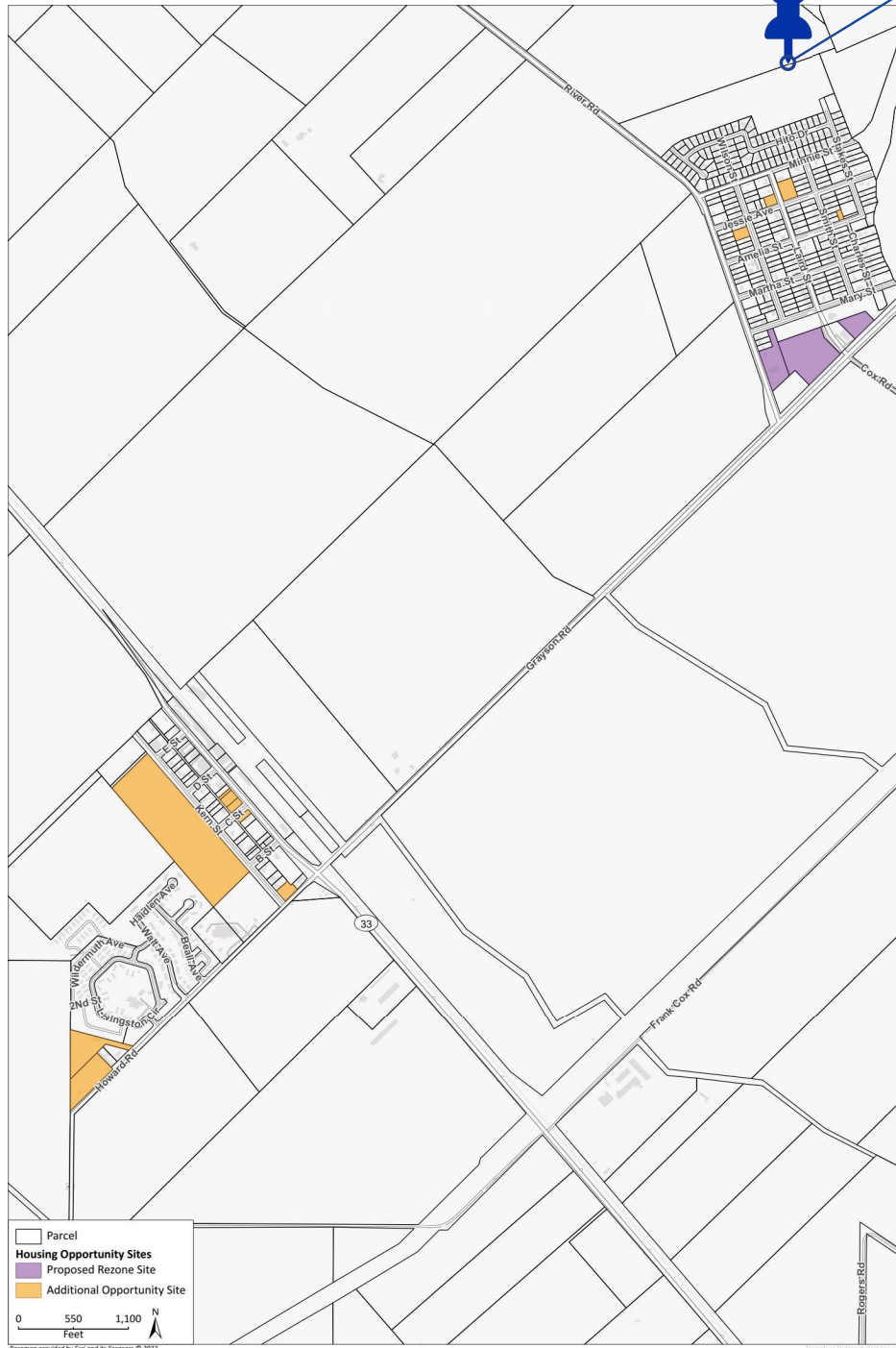
2023-2031 Housing Element Update

Where should new housing be built in Grayson and Westley?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



2023-2031 Housing Element Update

Where should new housing be built in Keyes?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



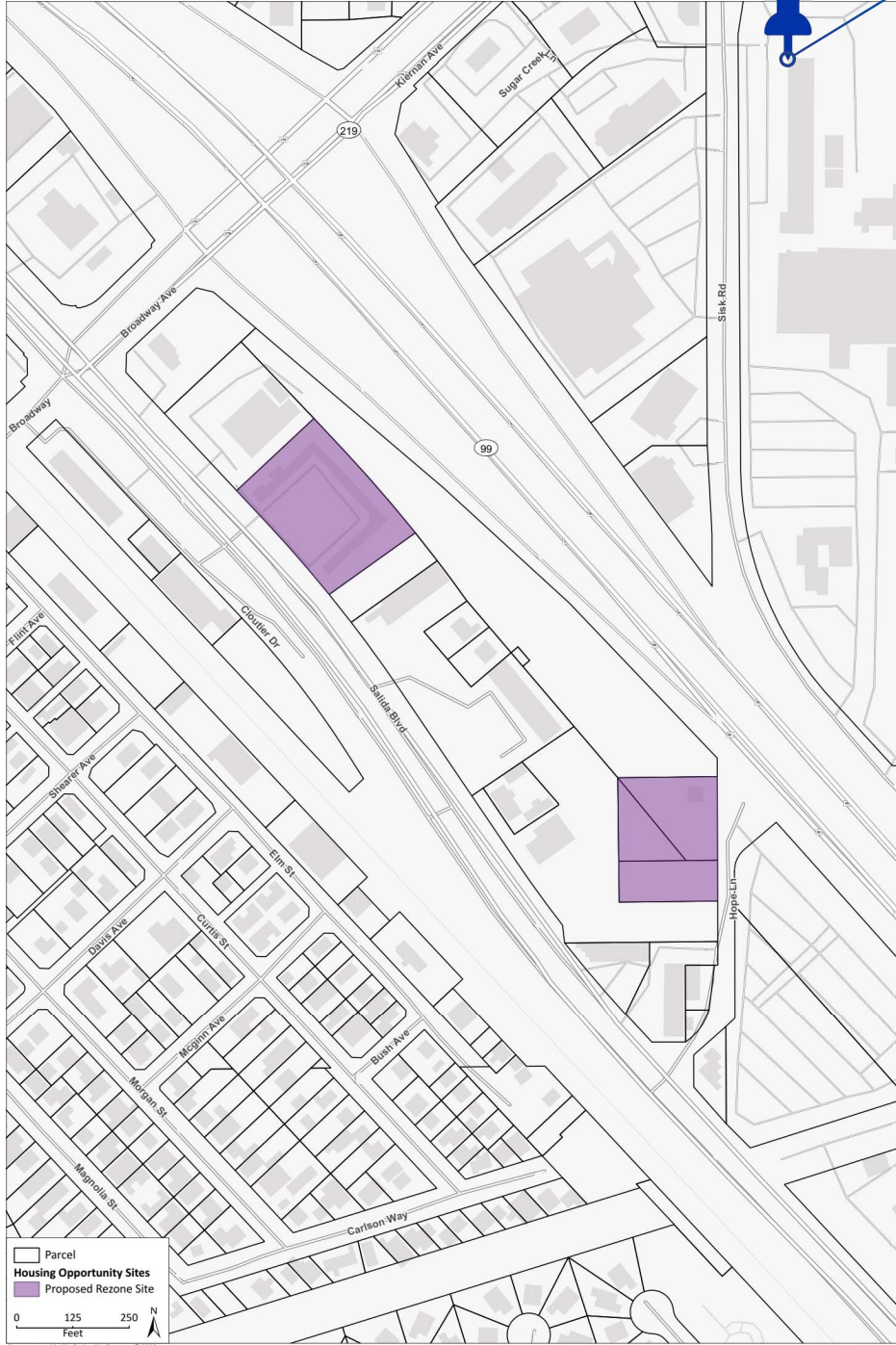
2023-2031 Housing Element Update

Where should new housing be built in Salida?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!

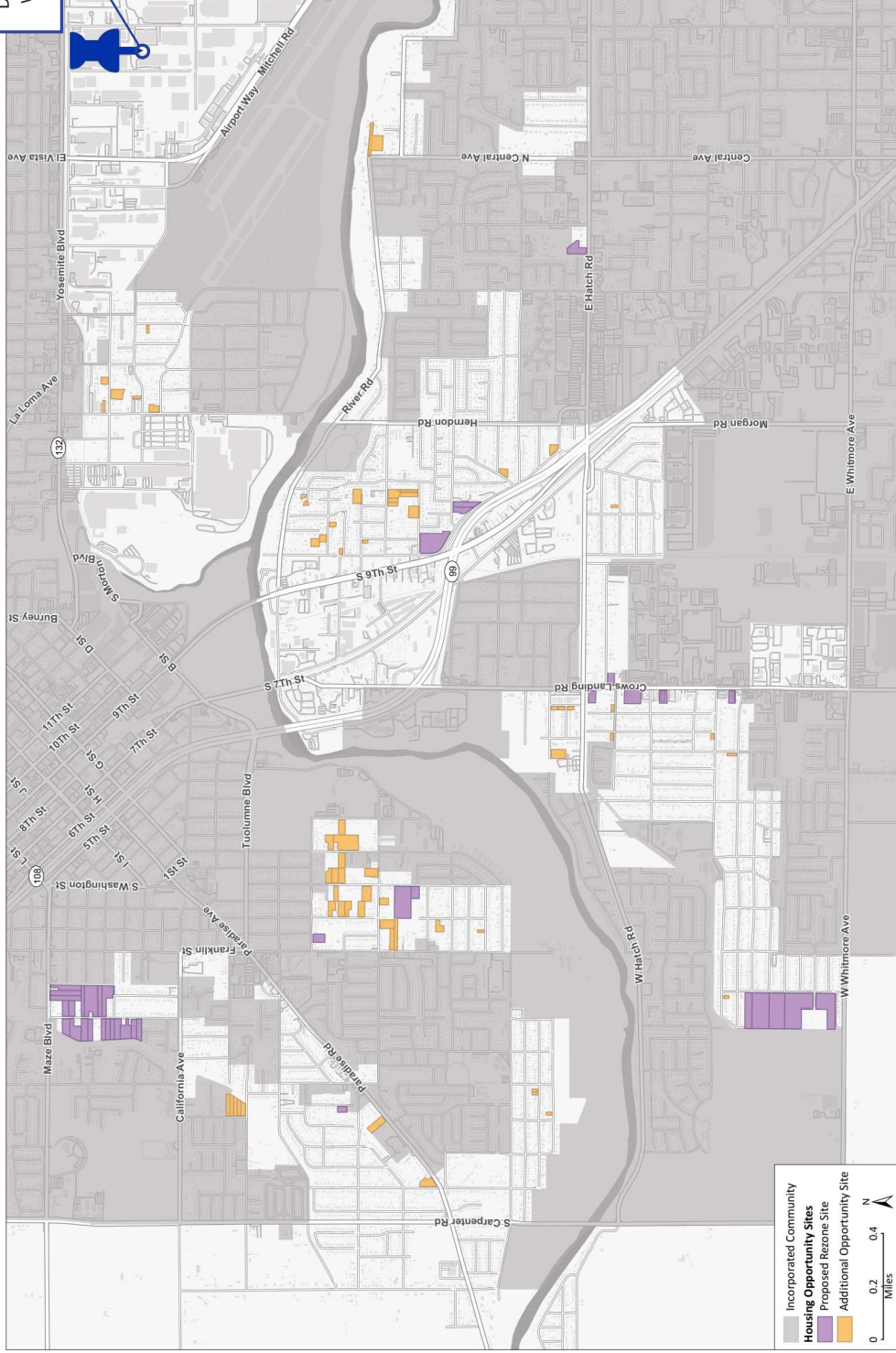


2023-2031 Housing Element Update

Where should new housing be built in Southwest Modesto?

Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



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2023-2031 Housing Element Update

Climate

What resources do you use to adapt to the events listed below?

What public resources do you wish were available to help you adapt to these events?

 Wildfires and Poor Air Quality

 Heat Waves

 Drought

2023-2031 Housing Element Update

What is Environmental Justice?

Environmental Justice is a concept focused on improving the unequal environmental burden placed on disadvantaged communities, especially minority populations.

Environmental Justice and the General Plan

Senate Bill 1000 amended Government Code Section 65302 to require that California cities and counties that have disadvantaged communities incorporate Environmental Justice policies into their general plans, either in a separate element or by integrating related goals, policies, and objectives throughout the other elements. The purpose of the law is to address the “unique or compounded health risks” in disadvantaged communities by decreasing pollution exposure, increasing community assets, and improving overall health. The Environmental Justice Element address the following themes:



Environmental Justice in Stanislaus County

Stanislaus County is in the process of developing Environmental Justice policies as part of the County’s General Plan Update. The Environmental Justice Policy Framework has been developed to identify key topics that will be addressed within the County’s Environmental Justice policies.



2023-2031 Housing Element Update

Environmental Justice Policy Framework #1

Pollution Exposure

- Drinking Water Quality
- Pesticide Pollution
- Lead Exposure from Housing
- Exposures from Hazardous Waste/Solid Waste Sites

Safe and Sanitary Homes

- Housing Rehabilitation Programs
- Overcrowding
- Cost of Housing and Rent

Food Access

- Improving Food Deserts
- Low-Income Food Resources
- Grocery Store/Supermarket Access
- Farmer's Markets and Community Gardens

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

 Pollution Exposure

 Safe and Sanitary Homes

 Food Access

2023-2031 Housing Element Update

Environmental Justice Policy Framework #2

Physical Activity and Health

- Asthma Rates
- Cardiovascular Disease
- Nutritional Education
- Healthcare Facilities Access (Hospitals, Clinics, etc.)

Public Facilities

- Expanding Bikeways and Improving Walkability
- Public Transportation Improvements
- Access to Parks

Civic Engagement

- Public Meeting Translation Services
- Use of Technology in Engagement
- Information sharing through schools, churches, and community centers

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

 Physical Activity and Health

 Public Facilities

 Civic Engagement

2023-2031 Housing Element Update

Environmental Justice Policy Framework #1

Pollution Exposure

- Drinking Water Quality
- Pesticide Pollution
- Lead Exposure from Housing
- Exposures from Hazardous Waste/Solid Waste Sites

Safe and Sanitary Homes

- Housing Rehabilitation Programs
- Overcrowding
- Cost of Housing and Rent

Food Access

- Improving Food Deserts
- Low-Income Food Resources
- Grocery Store/Supermarket Access
- Farmer's Markets and Community Gardens

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

Pollution Exposure

- ✓ illegal dumping w/ neighborhoods + parks/green space + ALLEYS
- ✓ Factory/agriculture air impacts

Safe and Sanitary Homes

Affordable Housing

- ✓ grant funding for homeowners secondary housing expansion "granny flats/tiny homes"

Housing Access & Availability is an issue, particularly for rental units. College students find it difficult to access housing they can afford.

Food Access

- ✓ Higher quality grocery stores w/ health focus wide foods fresh markets + trader joes

2023-2031 Housing Element Update

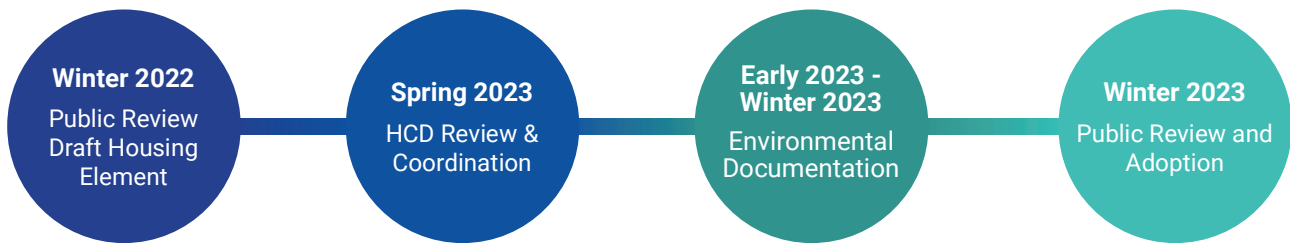
What's Next...

Upcoming Events

Community Workshop #3

The County will be holding a third Housing Element workshop later this year to discuss the development of housing goals, policies, and programs. The workshop will allow participants to provide input on the County's action plan for meeting housing needs through 2031. Visit www.stancounty.com/housingelement for more information.

Future Event Schedule



Get Involved!

Visit the Project Website

The project website is the hub for timely updates with information on the status of the project, announcements of upcoming events, and publication of key documents.

Sign-Up for Email Updates

You can join the email list on the project website. By signing up, you will be notified when the County releases new documents and announces meetings, workshops, and other events.

Join Meetings and Workshops

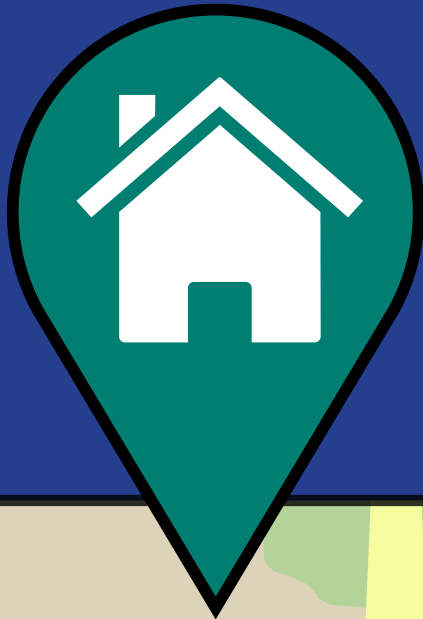
Not only are these great opportunities to learn about the Housing Element update, but meetings and workshops are also a great place to share your ideas and connect with the community.

Visit www.stancounty.com/housingelement for more information.



STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

Upcoming Community Workshop



Where should housing be built?

You can help answer this question and guide the future of housing in unincorporated Stanislaus County!

Community Workshop

Tuesday, October 11, 2022

6:00 - 7:30 pm

Ceres Community Center

2701 4th Street

Ceres, CA 95307

Questions?

Contact:

planning@stancounty.com

209-525-6330

Visit: stancounty.com/housingelement

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Ceres Community Center
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Ceres, CA 95307

Questions?

Contact:
planning@stancounty.com
209-525-6330

Stanislaus County is holding a community workshop to discuss the Housing Element Update, as well as the Safety and Environmental Justice Elements. The focus of the workshop is seek input on sites appropriate for the development of housing and to present information and initial findings related to the safety and environmental justice topics in the County. See you there!

Stay up to date! stancounty.com/housingelement

Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.

Próximo Taller Comunitario

¿Dónde se deben construir viviendas?

¡Nos puede ayudar a responder esta pregunta y guiar el futuro de las viviendas en el Condado de Stanislaus!

Taller Comunitario

martes, 11 de octubre, 2022

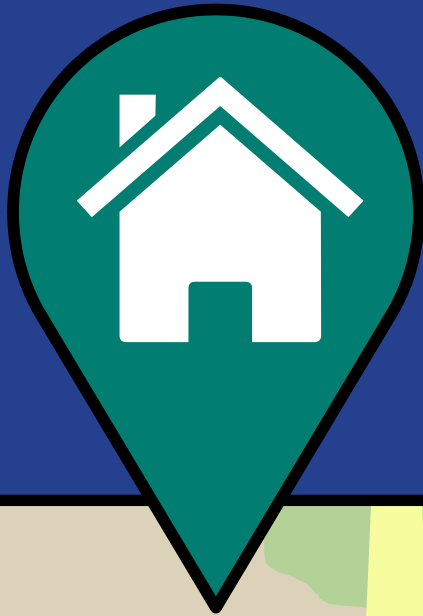
6:00 - 7:30 pm

Ceres Community Center

2701 4th Street

Ceres, CA 95307

Visite: stancounty.com/housingelement



¿Tiene alguna pregunta?

Contactar:

planning@stancounty.com

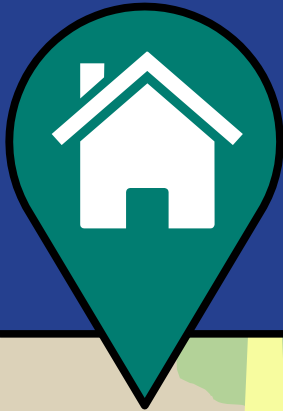
209-525-6330

Actualización del Elemento de Vivienda del Condado de Stanislaus 2023-2031

Próximo Taller Comunitario

¿Dónde se deben construir viviendas?

¡Nos puede ayudar a responder esta pregunta y guiar el futuro de las viviendas en el Condado de Stanislaus!



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martes, 11 de octubre, 2022
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¿Tiene alguna pregunta?

Contactar:
planning@stancounty.com
209-525-6330

El Condado de Stanislaus está programando un taller comunitario para presentar y conversar acerca de la Actualización del Elemento de Vivienda, así como los Elementos de Seguridad y Justicia Ambiental. El enfoque del taller es pedir información sobre sitios apropiados para el desarrollo de viviendas, para presentar información y hallazgos iniciales relacionados con los temas de seguridad y justicia ambiental en el Condado. ¡Espero verlo allí!

¡Manténgase al día! stancounty.com/housingelement

Visite el sitio web del proyecto para registrarse en nuestra lista de correo electrónico. Vuelva a consultar periódicamente los anuncios de las reuniones, los materiales de los talleres y los documentos públicos para su revisión a lo largo del proyecto.



STANISLAUS COUNTY GENERAL PLAN UPDATE COMMITTEE

AGENDA

April 6, 2023

3:00 – 5:00 P.M.

1010 10th Street, Third Floor, Room 3135

I. COMMITTEE MEMBERS:

Supervisor Withrow; Supervisor Chiesa; Supervisor Grewal (Alternate);
Commissioner Zipser; and Commissioner Durrer (Alternate).

II. DISCUSSION ITEMS:

1. 6th Cycle Housing Element Update
 - a. Discussion on draft Programs and Policies
 - b. Sites Inventory Update and Measure E

III. ADJOURNMENT

Next Meeting: **TBD**



October 17, 2022

SUBJECT: Housing Opportunity Sites Identified for Stanislaus County Housing Element Update for Planning Period 2023-2031

Stanislaus County is currently processing an update to its General Plan Housing Element. The County's Housing Element Update is updated every eight years in accordance with state law. The County last updated its Housing Element in 2016.

The purpose of the Housing Element Update is to identify the County's existing and projected housing need and to plan for housing that would accommodate all economic segments of the population. As part of the planning process for the next eight years starting in December 2023 and through December 2031, the County has identified properties where additional multi-family housing could be built. For example, if the current zoning of an identified property allows only non-residential use or detached single family homes, the County has identified the property to receive a change of zone (rezone) from its current zoning designation. You are receiving this letter because your property has been identified as a site that could accommodate additional residential units and may be included in a rezone program. The multi-family housing types that may be allowed include triplexes, townhomes, and small apartment complexes and could be developed *only* at the discretion of the property owner.

While the County is still determining a schedule for the rezone program and the specific zoning district sites will be rezoned to, the properties identified in the housing element will be part of a housing sites inventory that will be reported to the California Department of Housing and Community Development by Winter 2023.

Although your property has been identified as part of a rezone program, it does not require the property owner to construct housing units. The zoning simply allows the property owner the opportunity to add residential units. You are encouraged to learn more at the Housing Element website and make additional comment. An online housing opportunity public comment tool is currently available at the following web addresses: <https://arcg.is/1jL8zP> for the English version and <https://arcg.is/u8zuu> for a Spanish version. Comments will be accepted via the online GIS tool until October 31, 2022. Comments submitted after this date can be submitted to planning@stancounty.com.

Please feel free to email me at doudk@stancounty.com or call (209) 525-6330 if you would like more information or have any questions. Additionally, please visit the Housing Element website at www.stancounty.org/housingelement to learn more about the Housing Element schedule and process.

Sincerely,

Kristy Doud, Deputy Director
Planning Division

Stanislaus County

2023-2031 Housing Element Update

October 2022

Community Workshop #2

Site Inventory Map Packet

Thank you for attending the Stanislaus County’s Community Workshop for the 2023-2031 Housing Element Update on October 11, 2022! This packet contains maps of the nine unincorporated areas of Stanislaus County and the proposed housing opportunity sites to accommodate the County’s Regional Housing Needs Allocation (RHNA).

We ask you to review the maps on the following pages and provide your feedback. You can access the mapping exercise online at www.stancounty.com/housingelement.

Visit the Project website at <https://stancounty.com/housingelement>

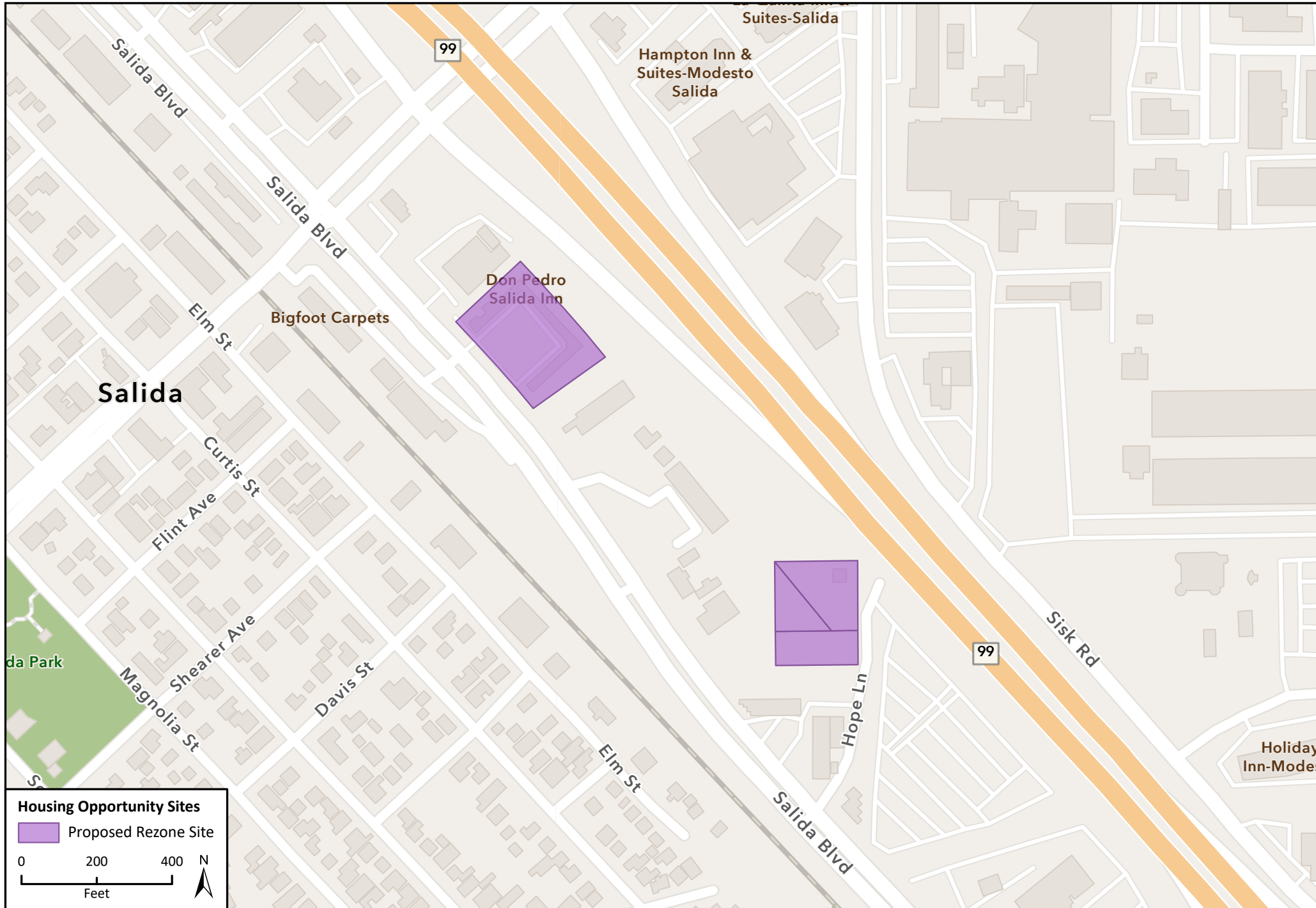


Complete the online mapping exercise: [English](#) | [Spanish](#)

Contents

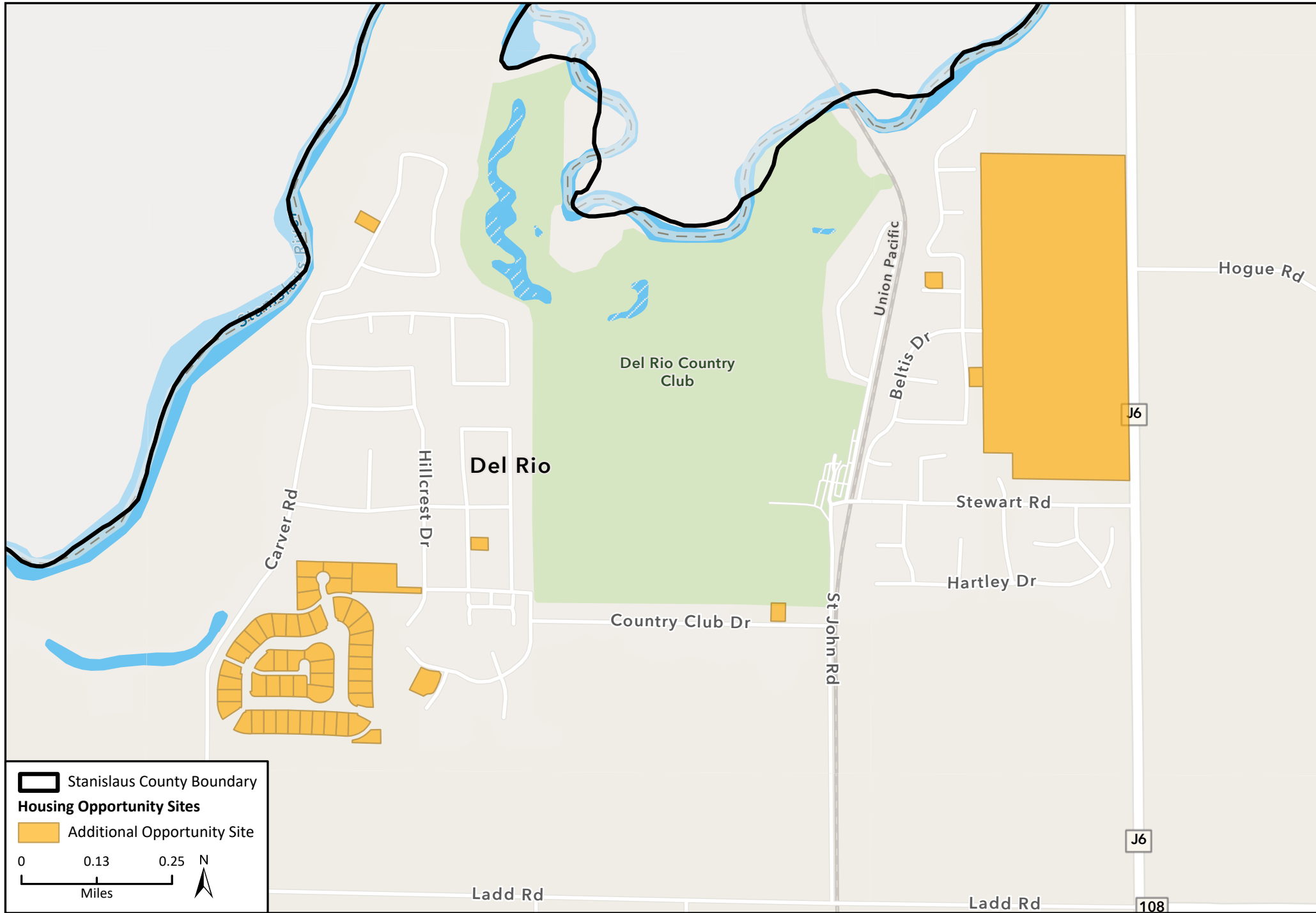
Salida	1
Del Rio	2
Empire	3
Southwest Modesto	4
Keys	5
Denair	6
Grayson & Westley	7
Diablo Grande	8
Hickman	9

Proposed Housing Sites in Salida



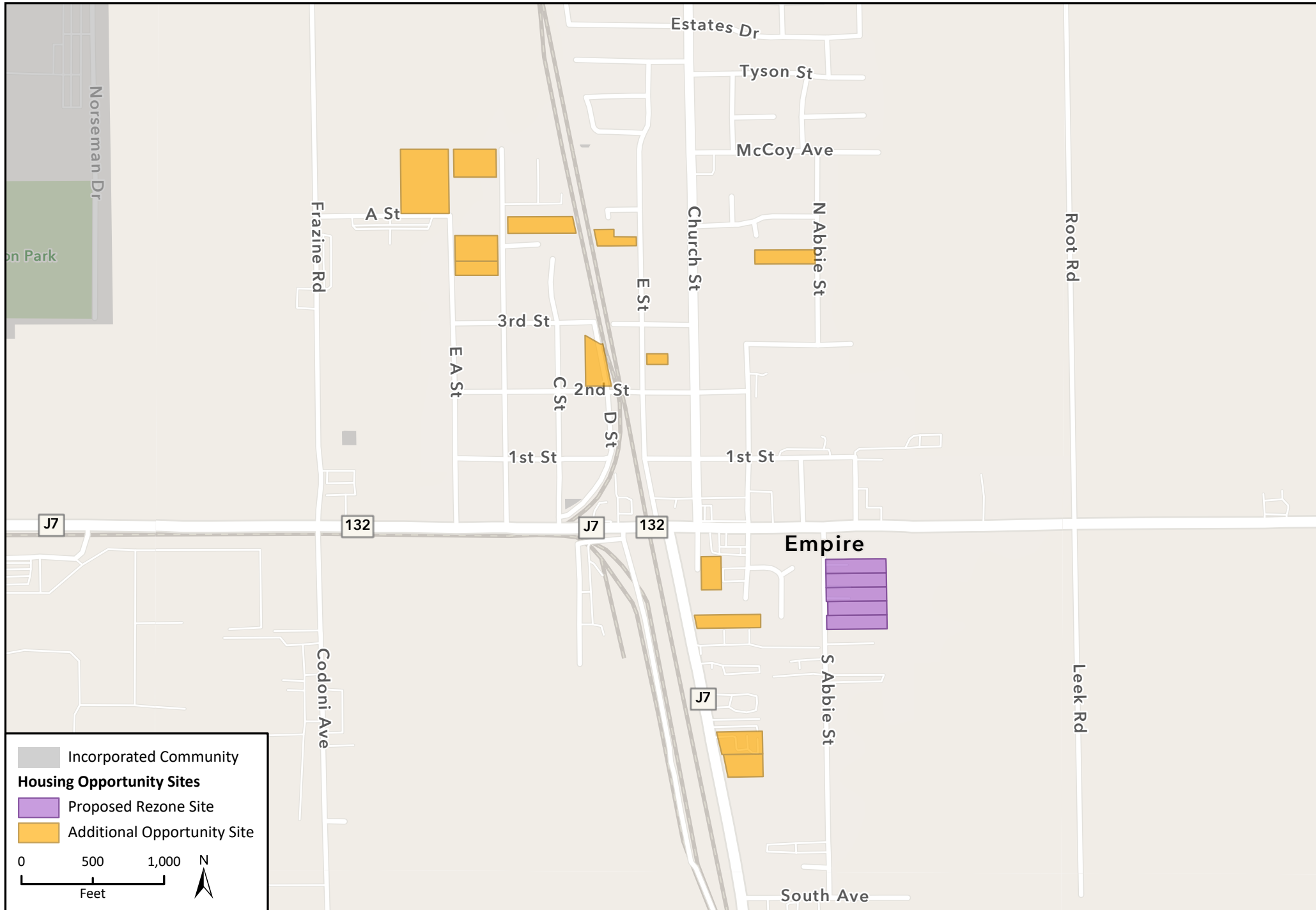
Basemap provided by Esri and its licensors © 2022.

Proposed Housing Sites in Del Rio



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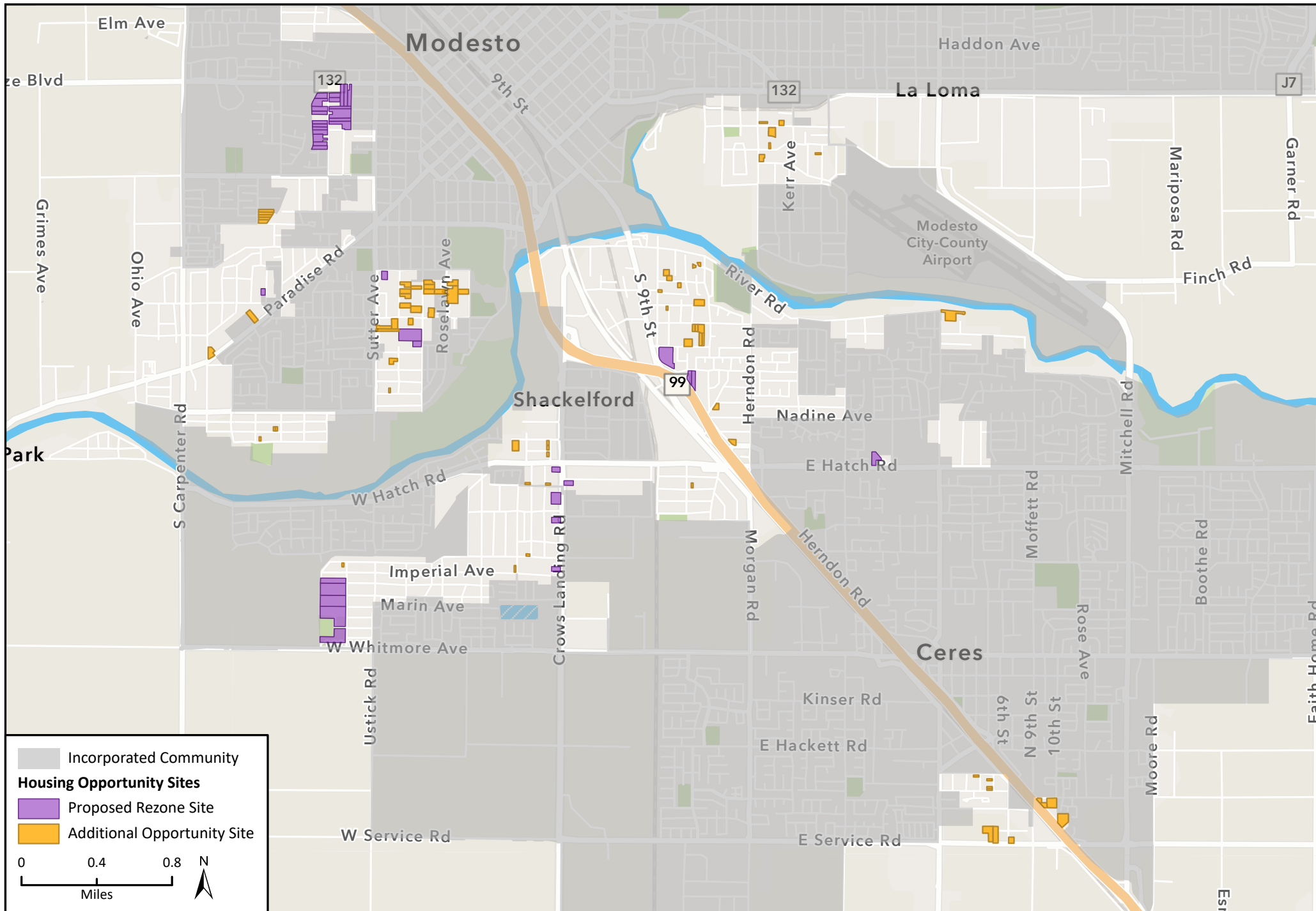
Proposed Housing Sites in Empire



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Stanislaus Outreach Package.aprx
Fig 3 Empire

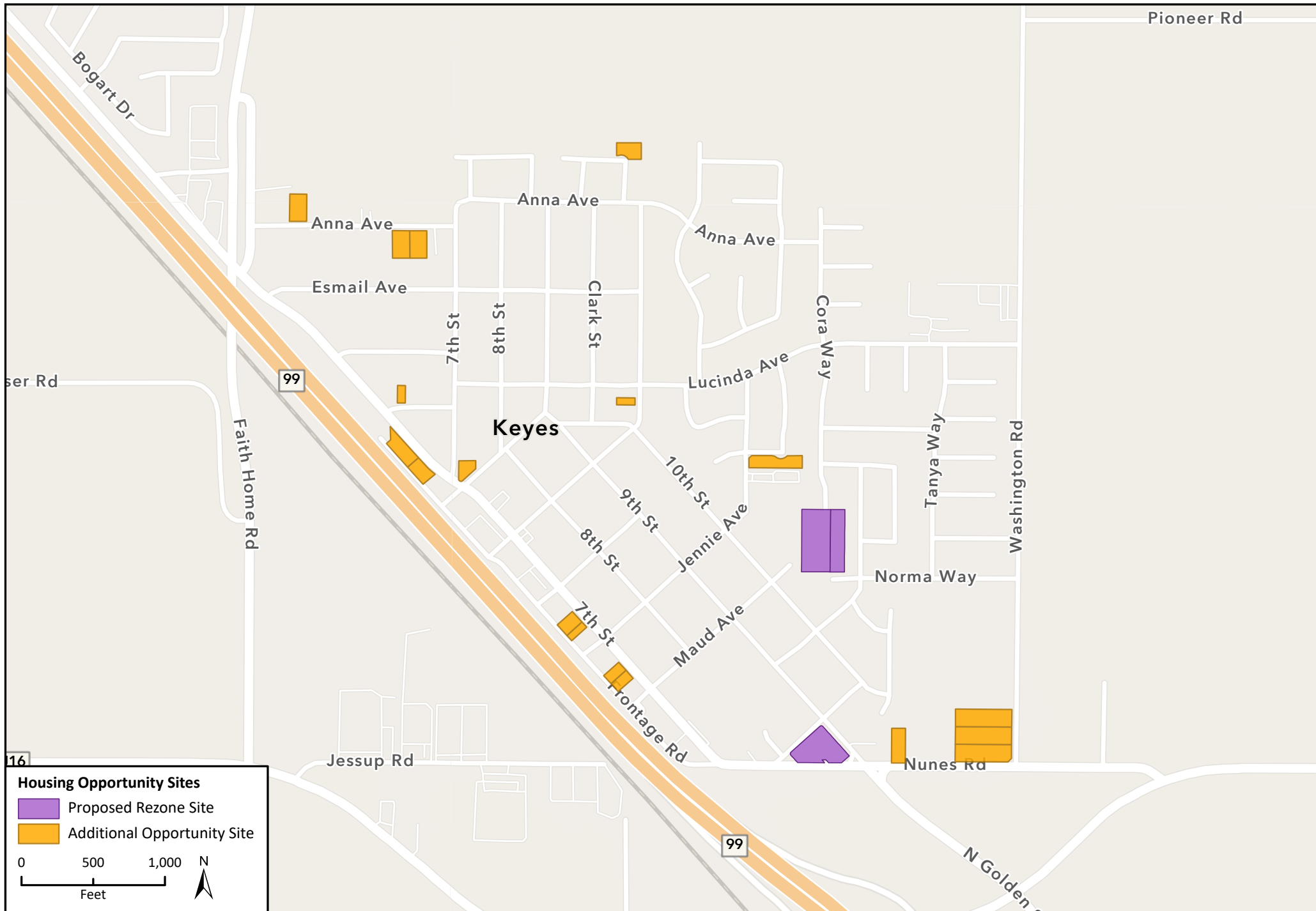
Proposed Housing Sites in Southwest Modesto



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Stanislaus Outreach Package.aprx
Fig 4 Southwest Modesto

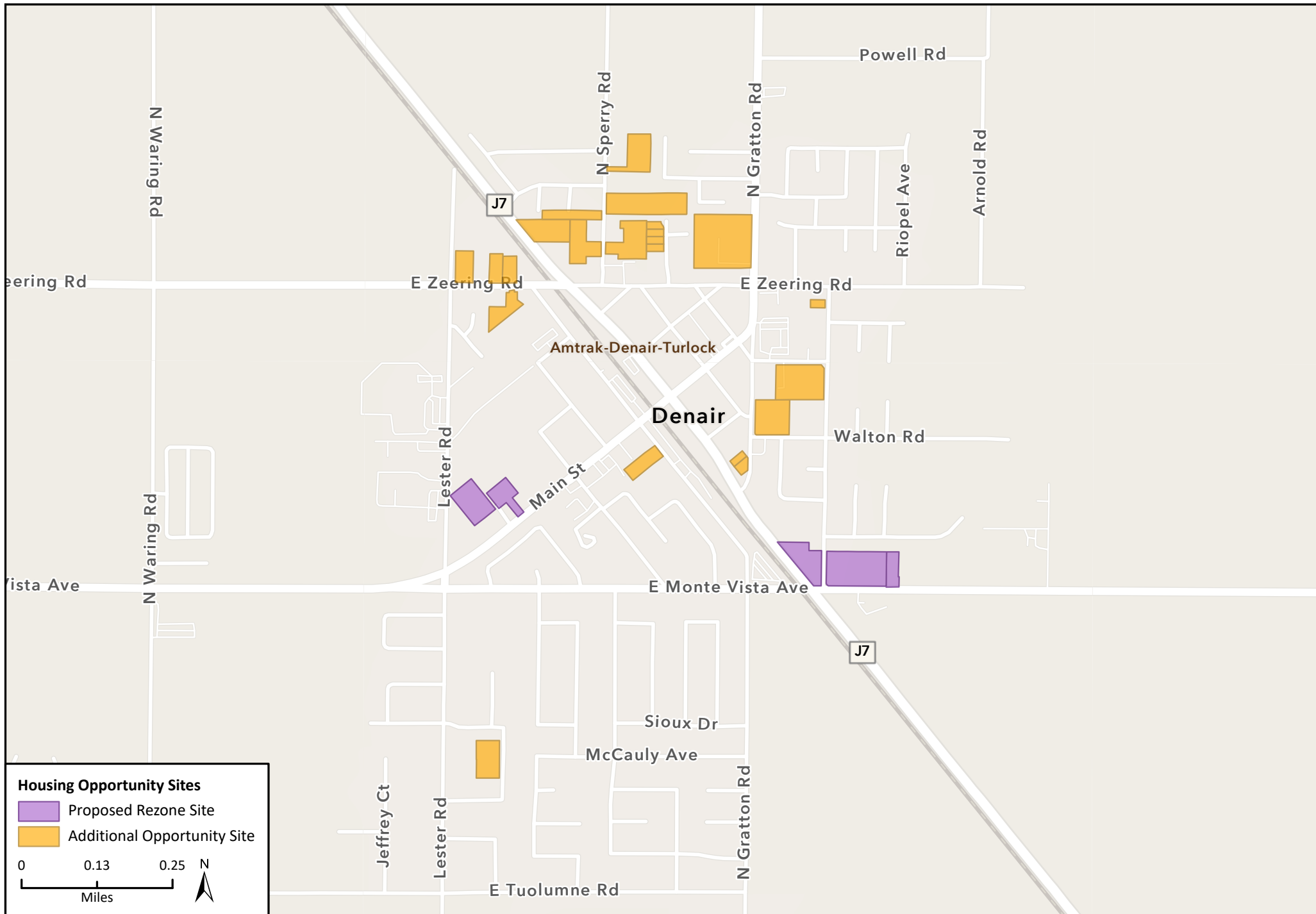
Proposed Housing Sites in Keyes



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Stanislaus Outreach Package.aprx
Fig 5 Keyes

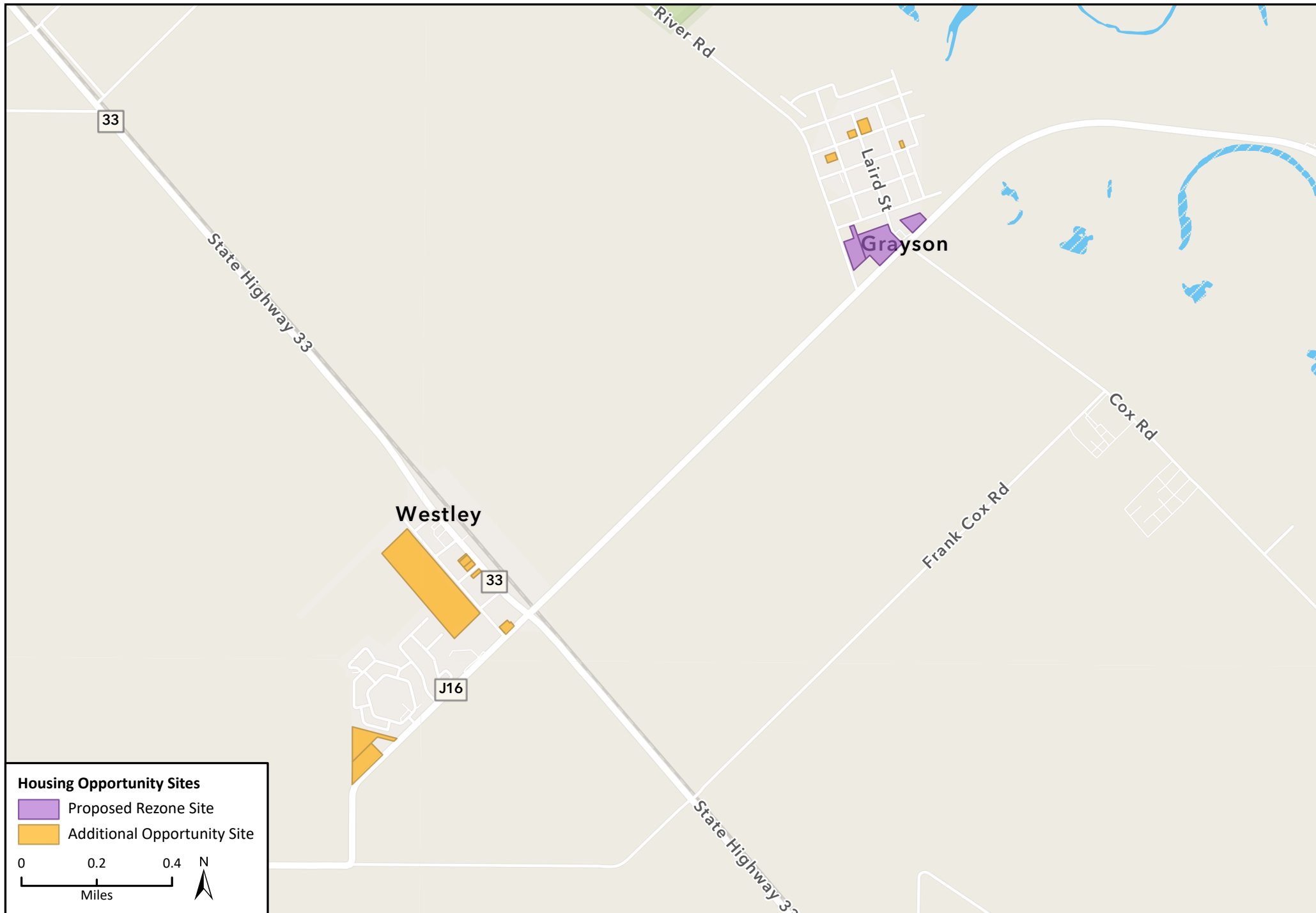
Proposed Housing Sites in Denair



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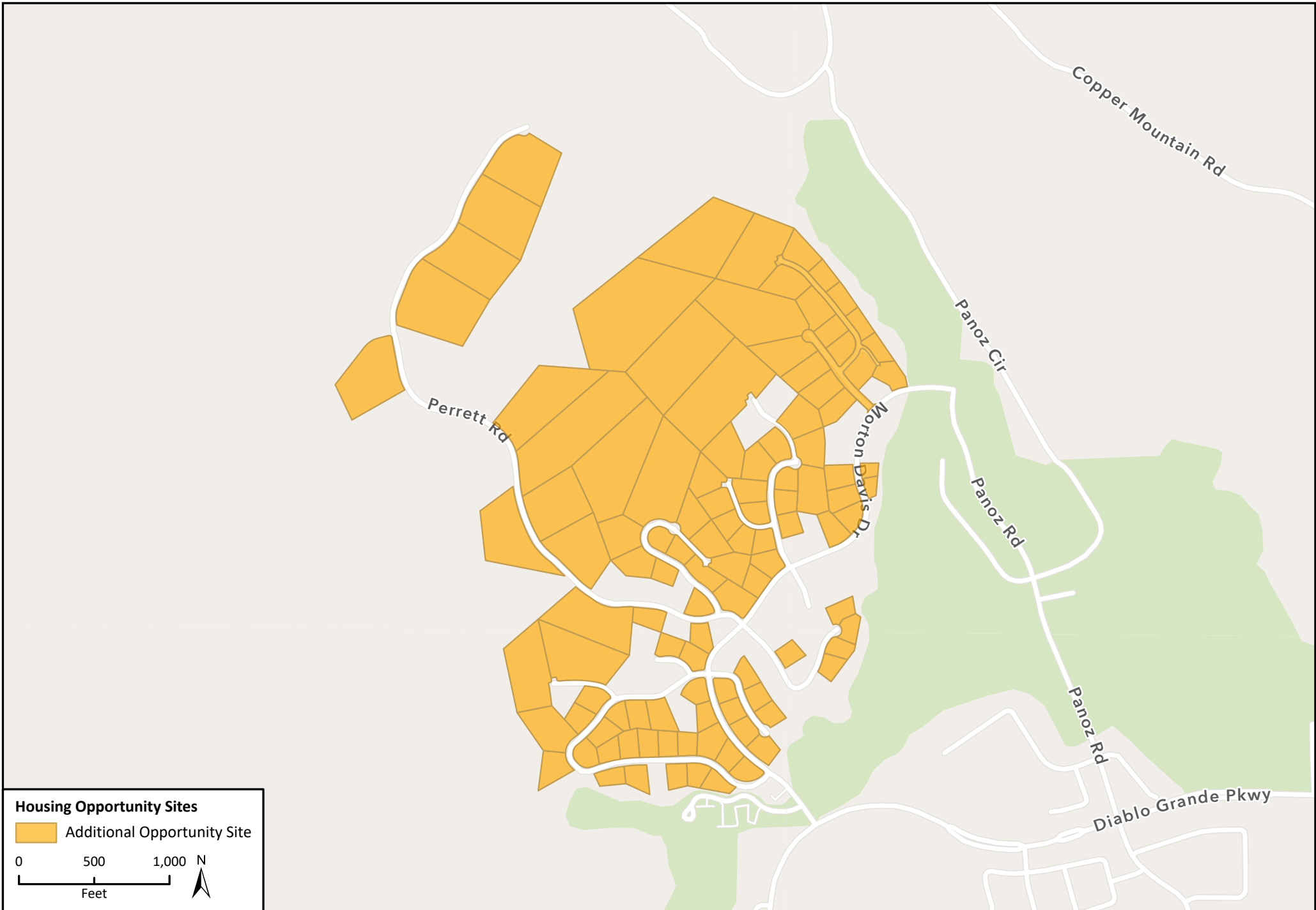
Stanislaus Outreach Package.aprx
Fig 6 Denair

Proposed Housing Sites in Grayson & Westley



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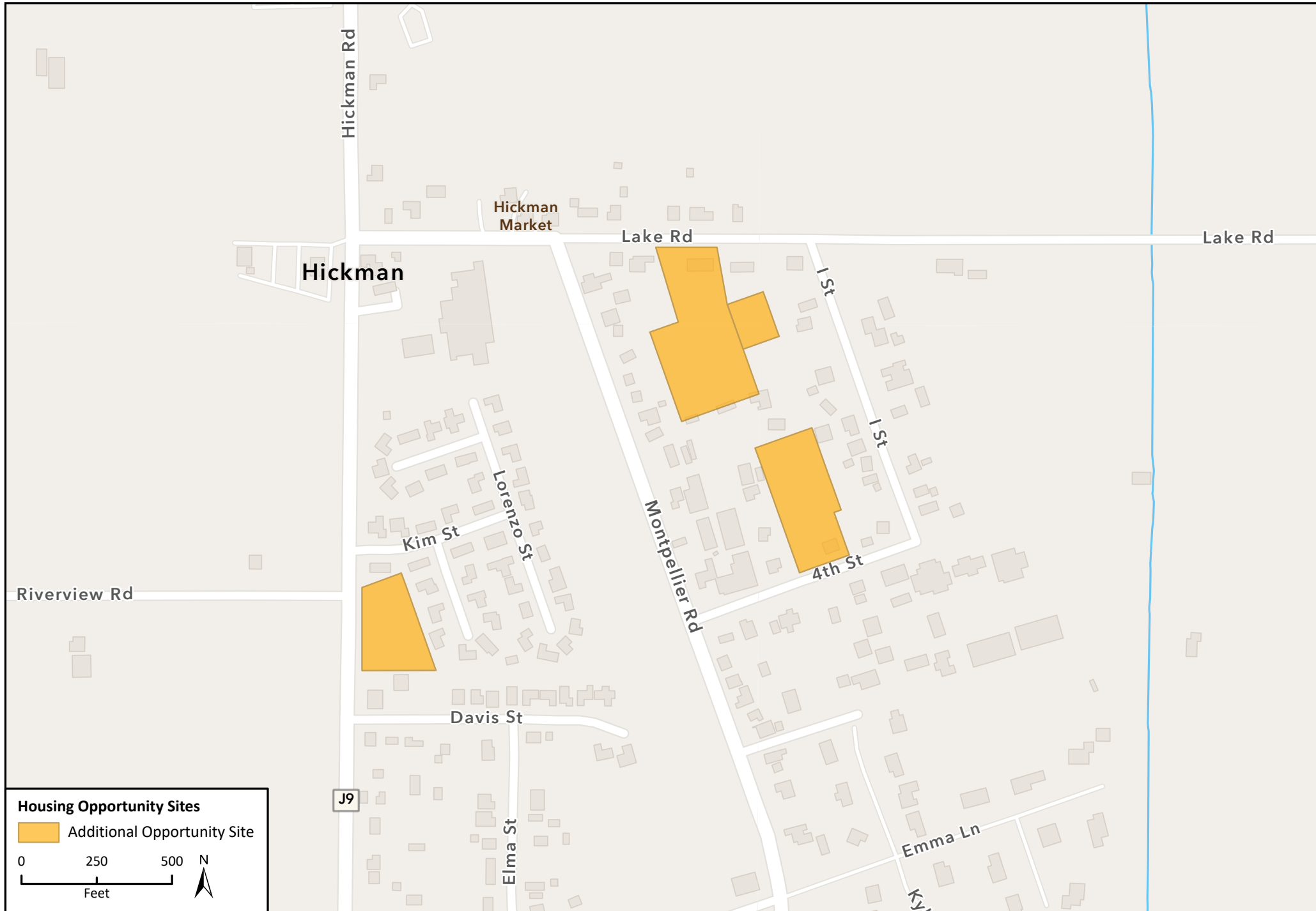
Proposed Housing Sites in Diablo Grande



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Stanislaus Outreach Package.aprx
Fig 8 Diablo Grande

Proposed Housing Sites in Hickman



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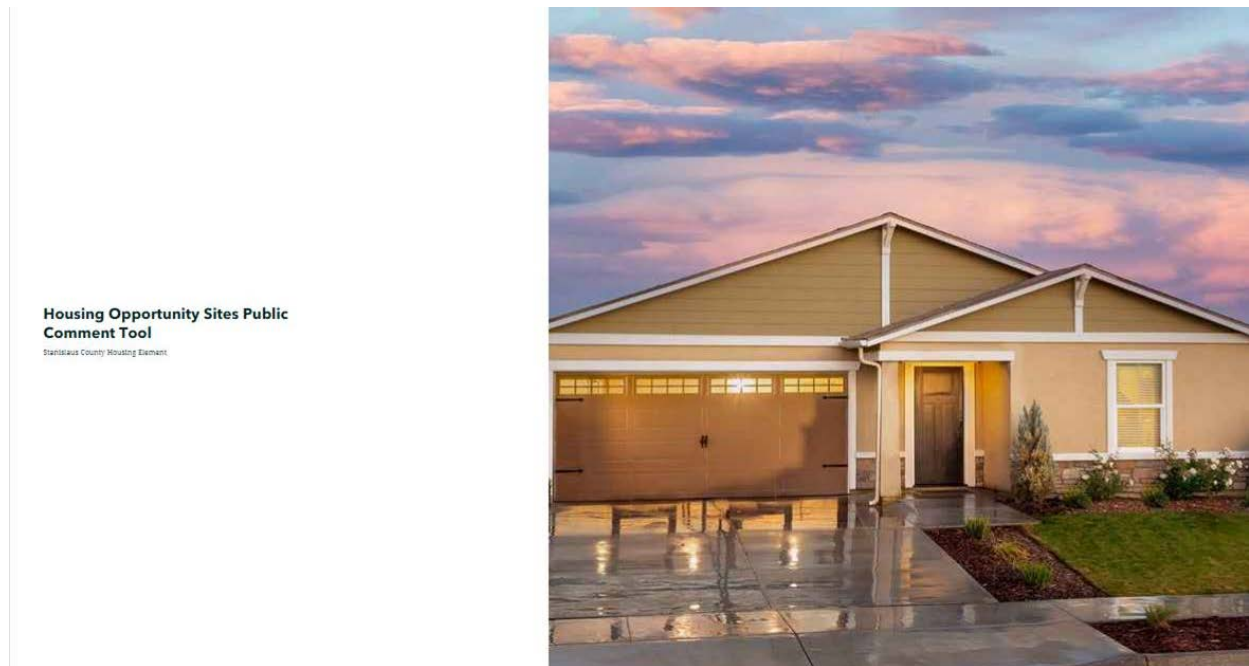
From: [Kristin Doud](#)
To: [smadison@stancoah.com](#); [gherry@dlsefinc.com](#); [hjmadvier@verizon.net](#); [adg@att.net](#); [dthufford@marok.com](#); [jim@assocang.com](#); [ben.millerdesign@yahoo.com](#); [mummett@mseng.net](#); [hocommercial@gmail.com](#); [avaldez@bright-homes.com](#); [johnb@baqv.org](#); [ray@homesdirect.com](#); [limberzyandassy@sbglobal.net](#); [costraich@coldstoragefm.com](#); [swellnitz@commercialarch.com](#); [torewale@gmail.com](#); [dfengineering@dfengineering.com](#); [denis@dlsmhdsdesignstudio.com](#); [sdmond@starchitect.com](#); [evan.zeff@gmail.com](#); [max@gdreng.com](#); [nprichard@kengineers.com](#); [cstark@sungaterealty.com](#); [rhawkins@hawkins-eng.com](#); [surfsupdw@yahoo.com](#); [tom@buffoon.com](#); [john@jbandersonplanning.com](#); [justin@jksdesigninc.com](#); [justin.capp@justinwapp.com](#); [craig@lewisacapadvisors.com](#); [janice.yes@ionakis.com](#); [info@mcrceng.com](#); [jmann@mva.net](#); [mike@mseng.com](#); [castibiz.net](#); [edmond@moradengengineering.com](#); [bill@morris-eng.com](#); [info@mulinconsulting.com](#); [mike@mavarrorac.com](#); [dave@newman-romano.com](#); [PHurban@mseng.net](#); [info@odellengengineering.com](#); [nick@pelfonwille.com](#); [george@petralakis.com](#); [modesto@paena.com](#); [lindon.blake@redfinesolutions.com](#); [dandr@bosodarkassociates.com](#); [tonest.associates@gmail.com](#); [kgmssd@stgrifsdng.com](#); [david@skyassociates.com](#); [sam.david@att.net](#); [rcharlotteddipont@gmail.com](#); [Donald.Phillips@stetras.com](#); [thompson@thompsonarchitecture.com](#); [gabriel@torreareichconstruction.com](#); [Torre@torreareichconstruction.com](#); [tweschwarz@yahoo.com](#); [kenyang@vico-engr.com](#); [nstammer@vvhco.com](#); [mike@wardlaw.com](#); [gmadsen@welyeng.com](#); [arcnorm@pacbell.net](#)
Cc: [Emily Basnight](#); [Angela Freitas](#)
Subject: Sites Inventory for the Stanislaus County 6th Cycle Housing Element Update
Date: Wednesday, October 12, 2022 5:17:00 PM
Attachments: [image003.png](#)

Stanislaus County has developed an online mapping tool to give an opportunity to the public to provide input on the proposed sites inventory for Stanislaus County's 6th Cycle Housing Element Update. The tool is available in English or Spanish at the following website: <https://www.stancounty.com/planning/pl/housing-element.shtm>. There is a short tutorial video explaining how to use the mapping tool. The mapping tool will be available for public input until 10/31/2022.

For more information about Stanislaus County's 6th Cycle Housing Element Update please visit <https://www.stancounty.com/planning/pl/housing-element.shtm> or email planning@stancounty.com.

El Condado de Stanislaus ha desarrollado una mapa en línea como herramienta para que el público tenga la oportunidad de ofrecer su opinión sobre el inventario de sitios propuestos para la Actualización del Elemento de Vivienda del 6^{to} Ciclo del Condado de Stanislaus. Esta herramienta está disponible en inglés o español en el siguiente sitio web: <https://www.stancounty.com/planning/pl/housing-element.shtm>. Hay un breve video que explica cómo usar el mapa en línea. Esta herramienta estará disponible para el público hasta el 31 de octubre, 2022.

Para obtener más información acerca de la Actualización del 6^{to} Ciclo del Elemento de Vivienda del Condado de Stanislaus, visite la página web: <https://www.stancounty.com/planning/pl/housing-element.shtm> o por correo electrónico: planning@stancounty.com.



Kristy Doud
Deputy Director
Stanislaus County Planning and Community Development Department

doudk@stancounty.com
(209) 525-6330
1010 10th Street Suite 3400
Modesto, CA 95354



Stanislaus County

6th Cycle Housing Element Update

Community Workshop #1

June 23, 2022 – 6:00 PM

Introductions



Nikki Streegan
Senior Planner



Saara Chaudry
Associate Planner



Jim Harnish, JD
Principal/Owner



Ryan Lester
Associate Planner



Teaming Partners



Presentation Outline

- Housing Element Basics
- Regional Housing Needs Allocation
- Safety Element
- Environmental Justice
- Schedule and Engagement

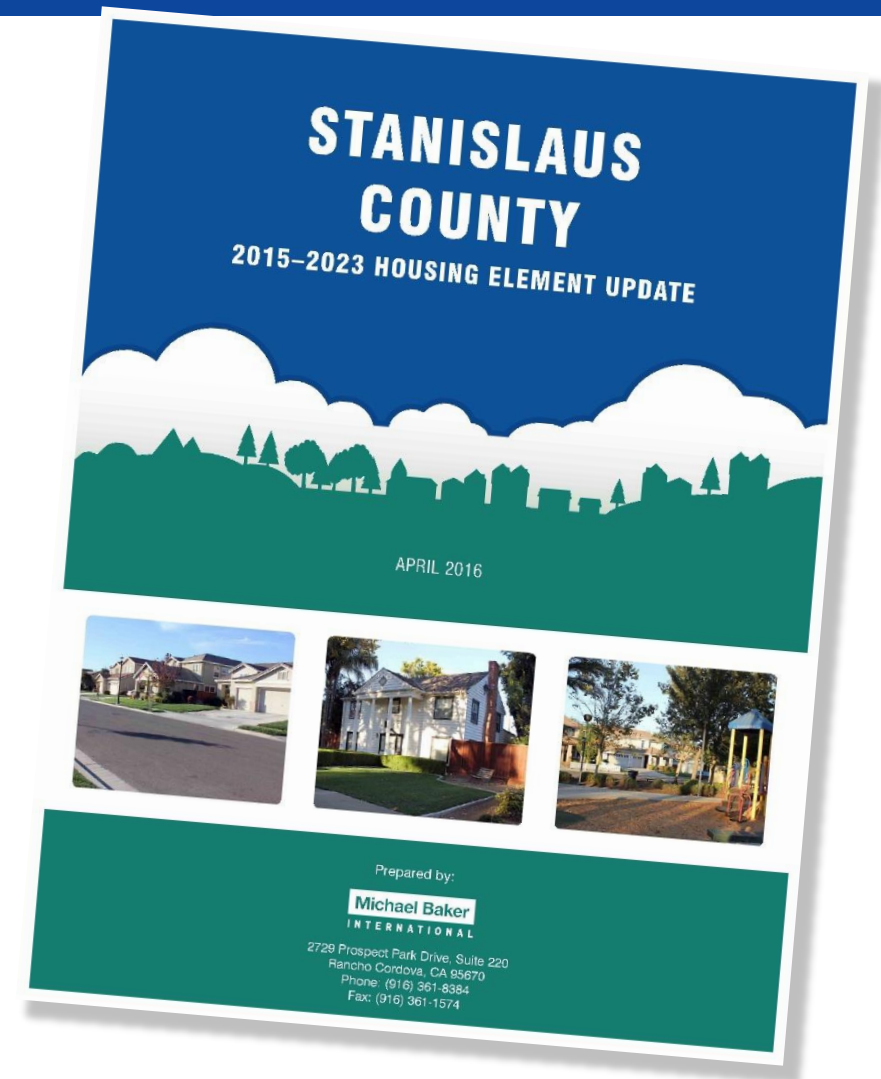




Housing Element Overview

What is a Housing Element?

- One of eight elements in the County General Plan
- Housing Element updates required by State law in eight year “cycles.”
- Currently preparing the 6th cycle Housing Element update
- Updates done on a schedule prescribed by the State (adoption deadline December 31, 2023)

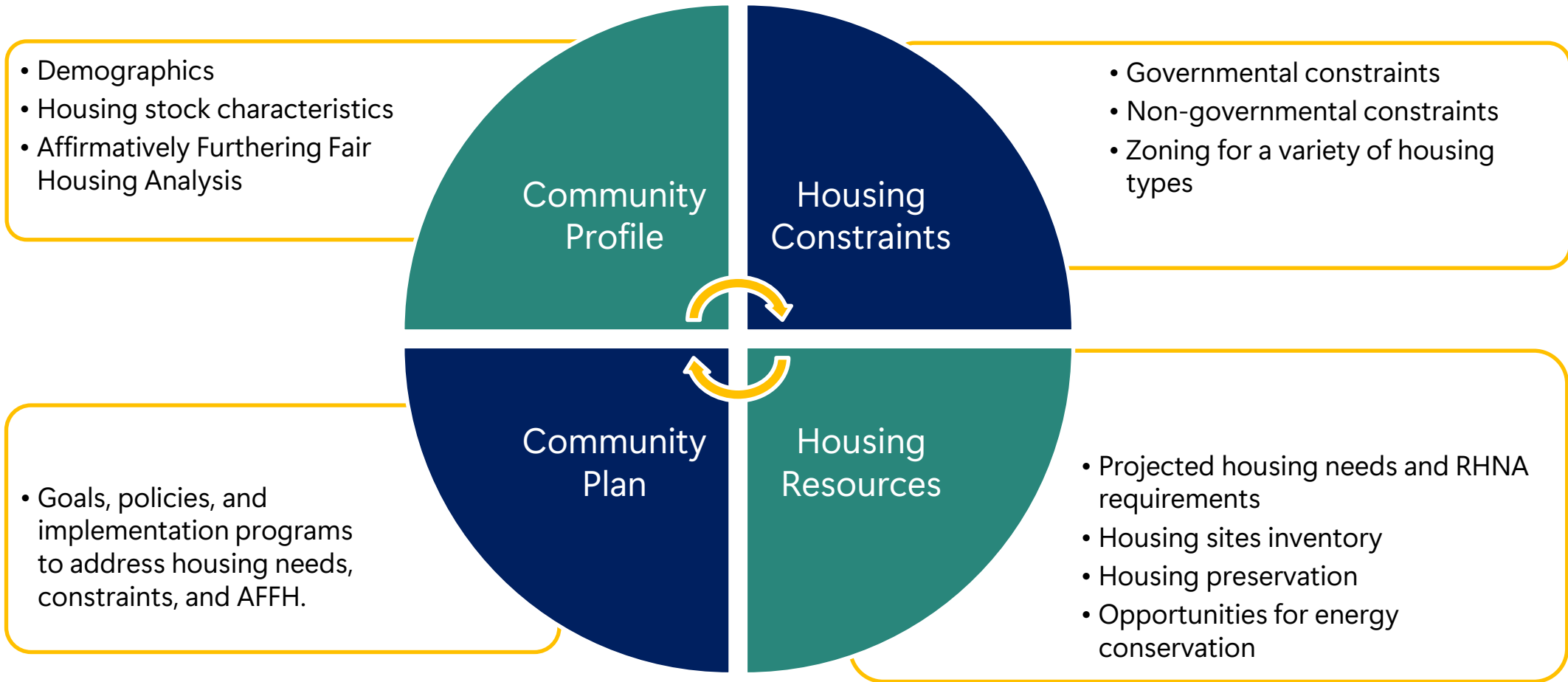


What does a Housing Element do?

- Provides an assessment of both current and future housing needs
- Identifies opportunities and constraints on housing production
- Establishes goals, policies, and programs to meet housing needs
- Updates County practices and regulations to reflect new State laws



Housing Element Basics



Housing Element Basics

Housing Element identifies strategies and programs that focus on:

- Conserving and improving existing affordable housing
- Maximizing housing opportunities throughout the community
- Assisting in the provision of affordable housing
- Removing governmental and other constraints to housing investment
- Promoting fair and equal housing opportunities



Relevant Legislation

- Affordable Housing Streamlined Approval Process: SB 35 (2017)
- ☀️ Additional Housing Element Sites Analysis Requirements: AB 879 (2017), AB 1397 (2017)
- ☀️ Affirmatively Furthering Fair Housing: AB 686 (2017)
- ☀️ No-Net-Loss Zoning: SB 166 (2017)
- ☀️ Safety Element Update to Address Adaptation and Resiliency: SB 1035 (2018)
- By-Right Transitional and Permanent Supportive Housing: AB 2162 (2018), AB 101 (2019)



Relevant Legislation

- ☀️ Accessory Dwelling Units: AB 2299 (2016), SB 1069 (2016), AB 494 (2017), SB 229 (2019), SB 13 (2019), AB 670 (2019), AB 671 (2019)
 - Density Bonus: AB 1763 (2019)
 - Housing Crisis Act of 2019: SB 330 (2019)
 - Surplus Land Act Amendments: AB 1486 (2019), AB 1255 (2019)
 - Housing Impact Fee Data: AB 1483 (2019)
 - Emergency and Transitional Housing Act of 2019: AB 139 (2019)
- ☀️ Standardization of Sites Inventory Analysis and Reporting: SB 6 (2019)
- ☀️ Evacuation Routes: SB 99 (2019), AB 747 (2019)



What happens if the County doesn't update the Housing Element?

- Out of compliance with State Law
- The General Plan could be deemed inadequate and therefore invalid
- A noncompliant or invalid General Plan creates the potential for the County to be sued when making land use decisions
- The County would be ineligible for several Federal and State housing, community development and infrastructure funding and grant programs

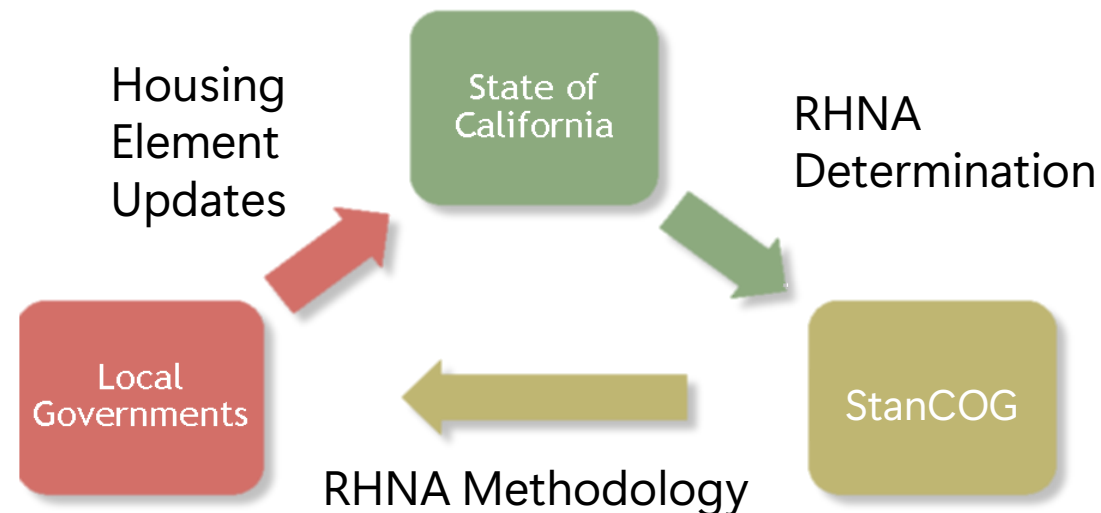




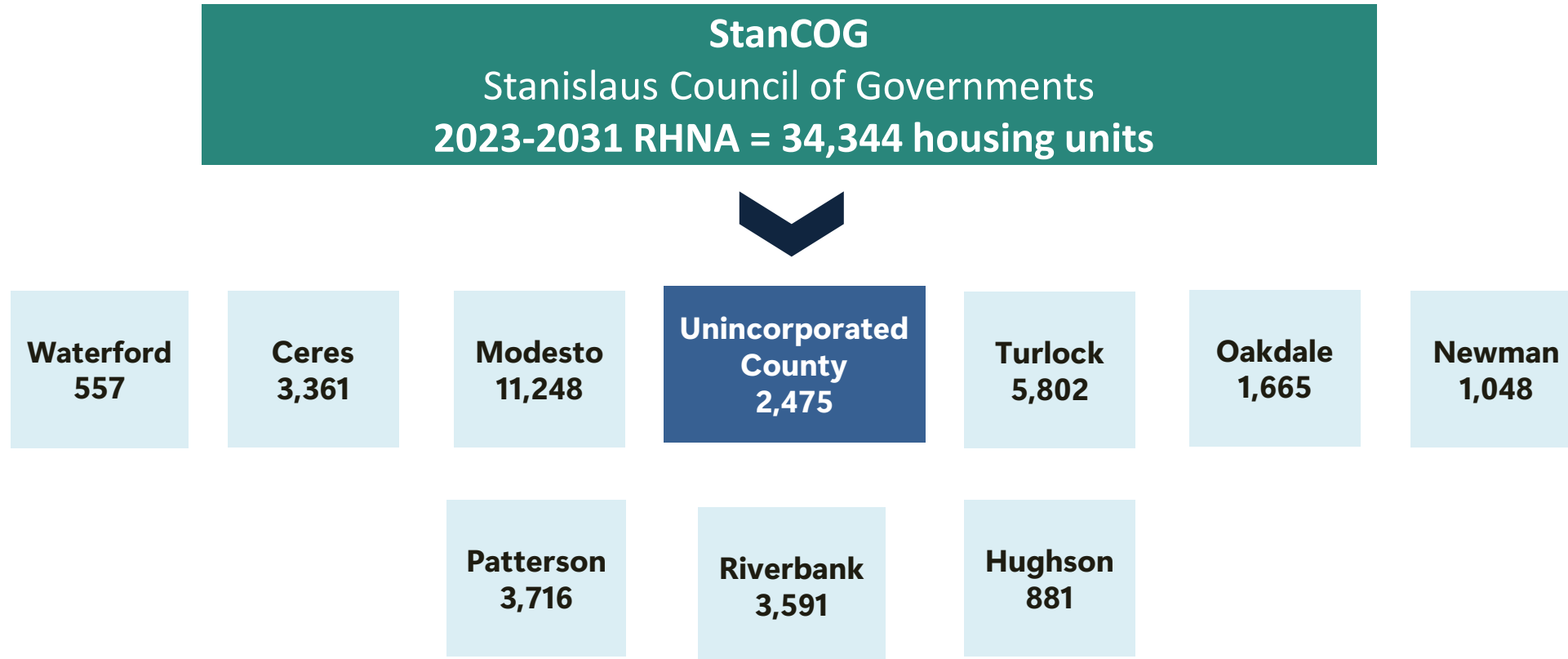
Regional Housing Needs Allocation (RHNA)

What is RHNA?

- The representation of the future housing needs for all income levels in the County for the next eight years
- Prepared by Stanislaus Council of Governments (StanCOG)
- 6th cycle: December 15, 2023 – December 15, 2031



StanCOG RHNA Distribution



Each jurisdiction must accommodate its “fair share” of the regional housing need.



RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low	Low			
574	398	458	1,045	2,475

Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**



RHNA Change Since Last Housing Element Update

Cycle	Lower		Moderate	Above Moderate	Total RHNA
	Very Low	Low			
5 th Cycle	538	345	391	967	2,241
6 th Cycle	574	398	458	1,045	2,475
Change	+36	+53	+67	+78	+234

Cycle	Lower		Moderate	Above Moderate
	Very Low	Low		
5 th Cycle	24.0%	15.4%	17.4%	43.2%
6 th Cycle	23.2%	16.1%	18.5%	42.2%

Source: The Board of Supervisors of the County of Stanislaus Board Action Summary, Resolution No. 2020-0169, Board Agenda Item 6.D.1 (April 21, 2020), StanCOG Proposed RHNA Methodology Framework, Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.



Stanislaus County Housing Need Requirement

**RHNA for Unincorporated Stanislaus County by Income Category, 2023-2031
and Ability to Pay for Housing Based on HCD Income Limits, Stanislaus County, 2022**

Income Category	RHNA (Housing Units)	Estimated Income (Four Person Household)	Maximum Affordable Monthly Rent
Extremely Low Income (<30% of Median Income)	287	< \$18,850	\$471
Very Low Income (30-50% of Median Income)	287	\$31,450	\$786
Low Income (50-80% of Median Income)	398	\$50,300	\$1,258
Moderate Income (80-120% of Median Income)	458	\$62,850	\$1,571
Above Moderate Income (>120% of Median Income)	1,045	> \$74,450	\$2,201
TOTAL	2,475	--	--

Source: StanCOG Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.





Housing Element Discussion

Questions

- What members of the community are most in need of housing and services?
- What are the unmet housing needs in Stanislaus County?
- What are the barriers to affordable housing in Stanislaus County?
- What can the County and community leaders do to address these needs and barriers?



General Project Schedule



Milestones	Estimated Date
Workshop #1: Housing, Safety, and EJ	June 23, 2023
Planning Commission Study Session	July 2022
Workshops #2 and #3	Summer/Fall 2022
Public Review Draft Housing Element	January 2023
HCD Review of Draft Housing Element	April-June 2023
Planning Commission Hearings	Oct/Nov 2023
Board of Supervisors Hearings	Nov/Dec 2023
Submit to HCD for Certification	December 2023



Community Engagement Events

- Three Community Workshops
- Two Study Sessions
 - Planning Commission (1)
 - General Plan Update Committee (1)
- Four Public Hearings
 - Planning Commission (2)
 - Board of Supervisors (2)



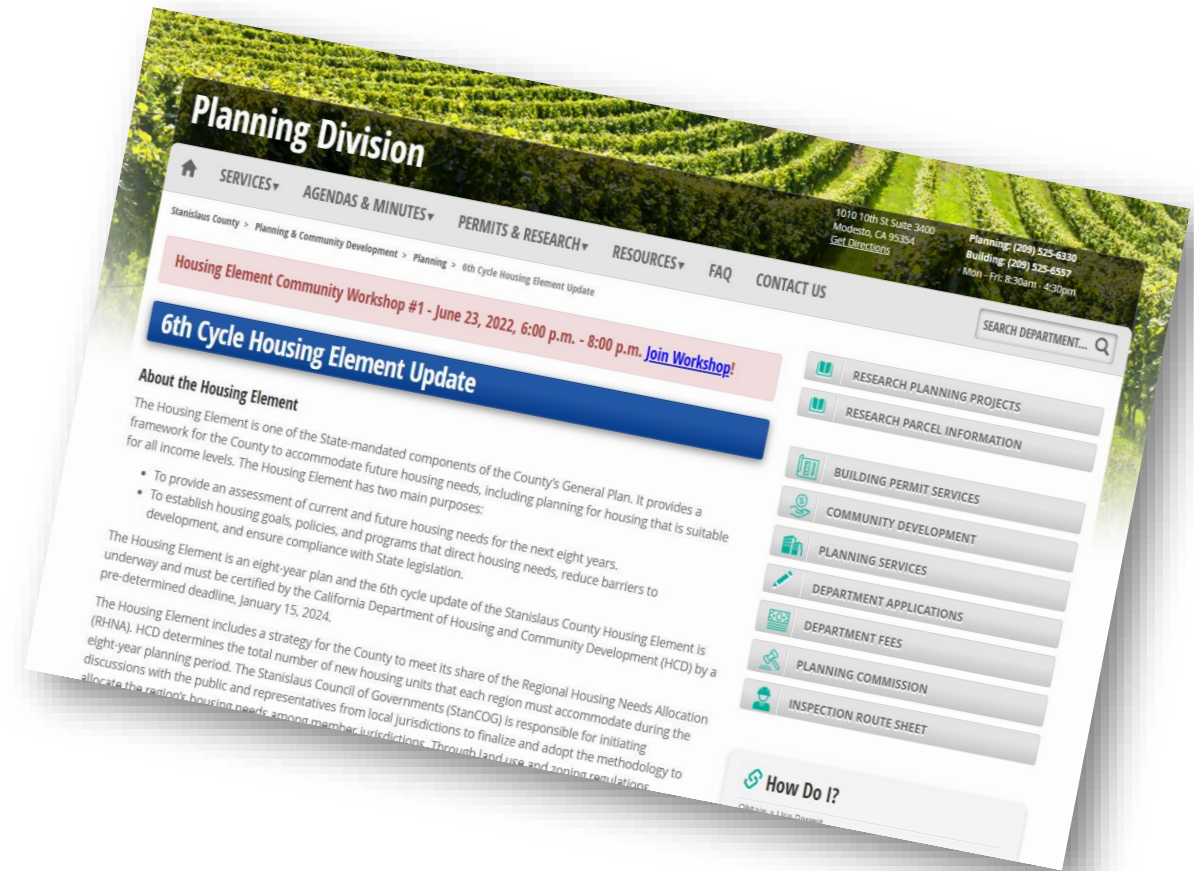
Community Workshops

Workshop 1	<ul style="list-style-type: none">▪ Housing Element Overview <i><u>Today!</u></i>▪ Project Overview & Discussion
Workshop 2	<ul style="list-style-type: none">▪ Sites Inventory Analysis▪ Feedback on Environmental Justice & Safety Elements
Workshop 3	<ul style="list-style-type: none">▪ Preliminary Housing Element Goals, Policies, and Programs▪ Review Environmental Justice & Safety Elements



Public Information and Participation

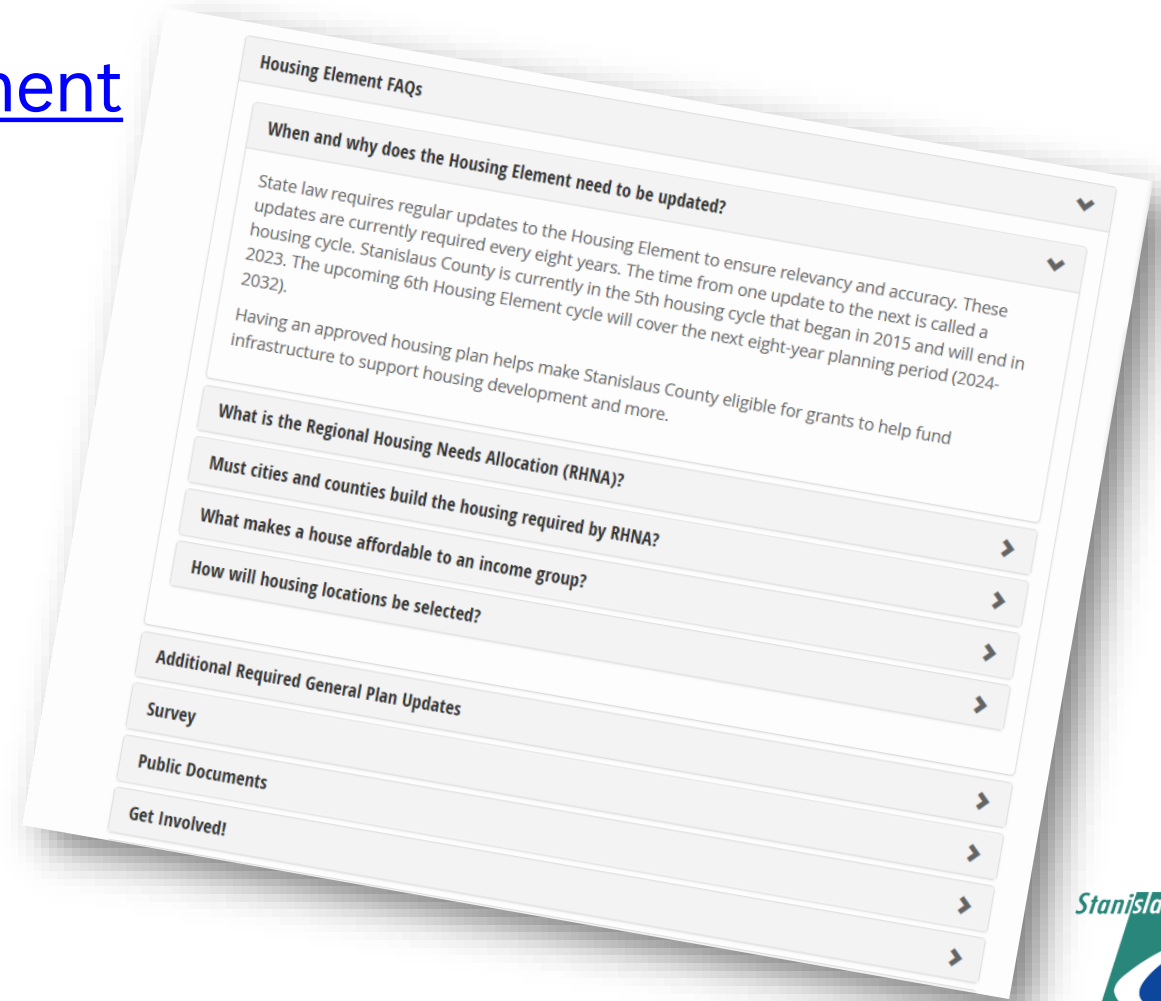
- Website
- E-mail Blasts
- Social Media
- Stakeholder Interviews
- Bilingual Online Survey
- Spanish Translation Services



Website

www.stancounty.com/housingelement

- Up-to-date information
- Meeting and workshop calendar
- FAQs
- Public documents
- Email sign-up





Stanislaus County

6th Cycle Housing Element Update

General Plan Update Committee Presentation

July 7, 2022 – 3:00 PM

Community Workshop #1 Highlights

Housing and Safety:

- Needs include housing for **homeless/transitional, affordable for seniors, foster youth**, in proximity to **transit and resources**.
- Emphasis on **infill opportunities** rather than outward growth.
- Safety Element should **involve OES** among stakeholders.
- Natural disasters and **climate change** have a greater impact on **low-income households**.
- More **green infrastructure** is needed.



Community Workshop #1 Highlights

Environmental Justice:

- **Pollution concerns:** smog from vehicles, air quality, water quality.
- **Facilities:** parks are accessible, but no restrooms. The unincorporated *islands* lack resources.
- **Healthy food access:** other modes of transportation to grocery stores are needed, most travel to stores by car.
- **Physical activity:** need bike and walking paths, dedicated bike lanes.





Sites Inventory

Sites Inventory

6th Cycle Criteria:

- Sites likely to redevelop or develop in next 8 years:
 - Vacant
 - Owner/developer interest
 - Low improvement to land value ratio
 - Low FAR if non-vacant
- Standards for lower income sites:
 - 0.5 and 10 acres in size
 - Allow at least 20 dwelling units/acre
 - Large enough to accommodate at least 16 units
 - Infrastructure-ready
 - Access to jobs, transit, and services



Sites Inventory

Units Needed:

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	574	398	458	1,045	2,475
Planned and Approved Units	0	0	0	299	299
ADUs	0	0	0	96	96
Remaining RHNA After Credits	574	398	458	650	2,080
5th Cycle Units*	43	29	99	308	479
Vacant & Nonvacant Units*	214	148	268	975	1,605
Potential Rezone*					0
Total Units in Inventory	257	177	367	1,283	2,084
Total Unit Surplus (Shortfall)	(317)	(221)	(91)	633	4



Maximum Residential Densities

Zone District	Max Residential Density
Residential	
R-A	1 du/3 acres*
R-1	8 du/acre**
R-2	14 du/acre**
R-3	25 du/acre**
Commercial	
C-1	25 du/acre**
Agriculture	
A-2	2 du/20 acres

*If the General Plan land use is Estate Residential, the minimum lot size is 3 acres. Otherwise, minimum lot size is 8,000SF.

**Maximums are subject to underlying General Plan land use and if parcel is connected to sewer and water.

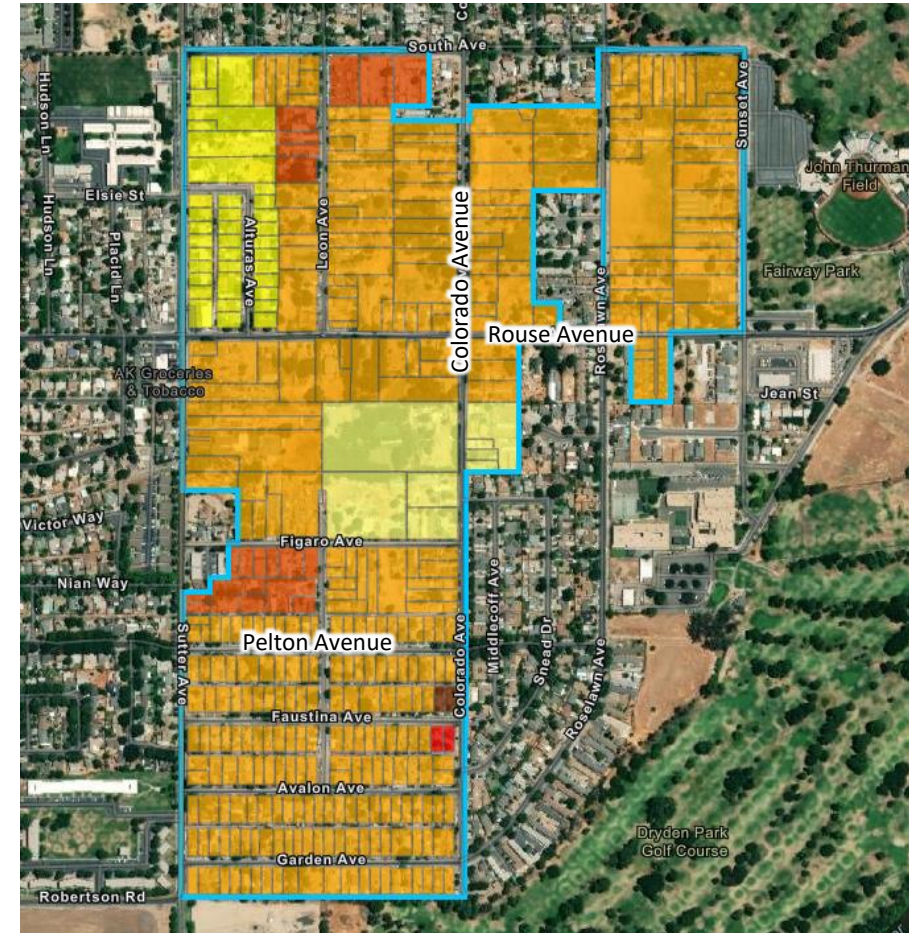


Approaches to Meet Lower Income RHNA

Example 1: Rezone Specific Residential Parcels

- R-2 to R-3
- R-1 to R-3

Example Area: Rouse/Colorado

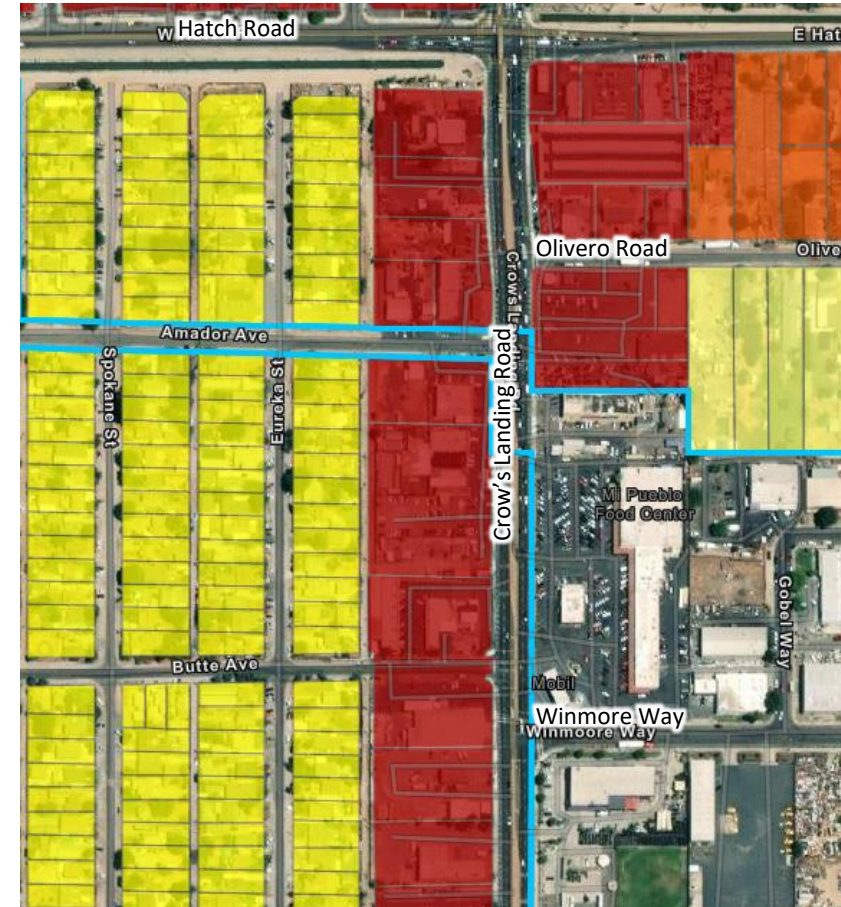


Approaches to Meet Lower Income RHNA

Example 2: Rezone Specific Commercial Parcels

- Vacant/underutilized
- 0.5 - 10 acres
- Must meet minimum 20 du/acre
- C-1, R-3, or new district

Example Area: Commercial Corridor

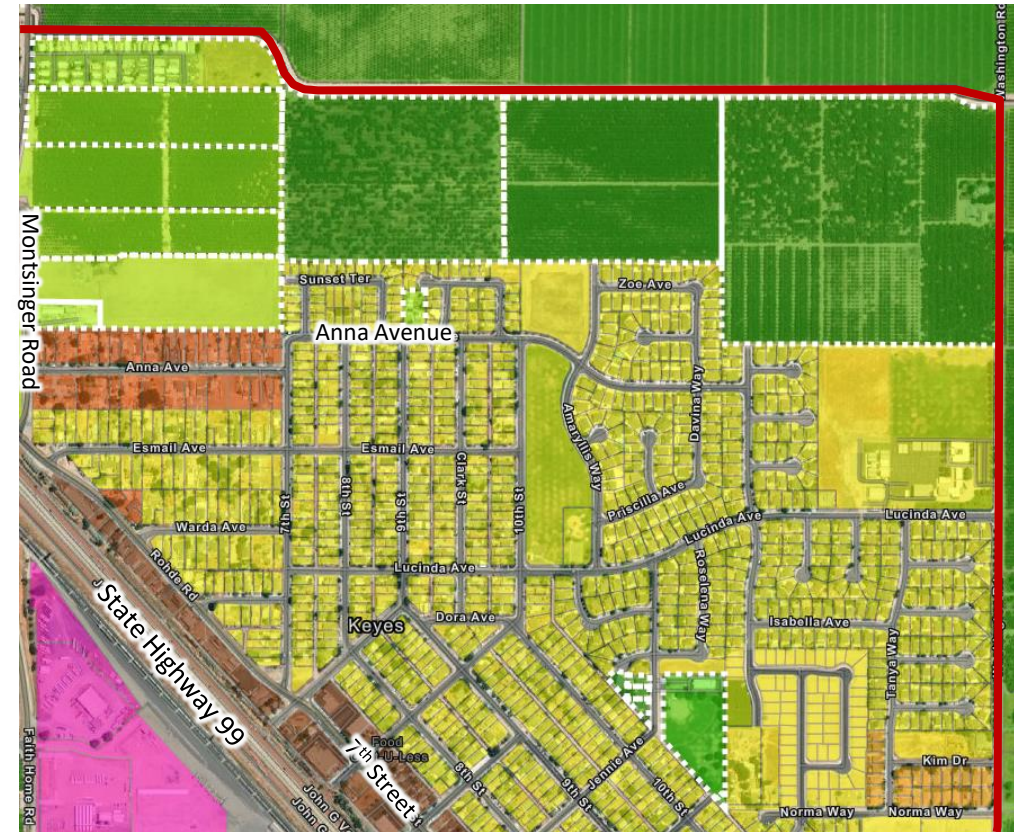


Approaches to Meet Lower Income RHNA

Example 3: Rezone Measure E exempt parcels

- A-2 to C-1 or R-3
- For parcels over 10 acres, a development agreement, specific plan, or inclusionary requirement may be needed (to meet lower income RHNA)

Example area: North Keys



Other Approaches

Policy Considerations

- Allow for higher density in General Plan Land Use Element
 - Up to 20 du/ac in Medium Density Residential
- Allow for higher density in some zone districts
 - Amend R-2 zone district to allow up to 20 du/ac





Q&A

Additional Slides



What happens if the County doesn't update the Housing Element?

- Out of compliance with State Law
- The General Plan could be deemed inadequate and therefore invalid
- A noncompliant or invalid General Plan creates the potential for the County to be sued when making land use decisions
- The County would be ineligible for several Federal and State housing, community development and infrastructure funding and grant programs



RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low	Low			
574	398	458	1,045	2,475

Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**





Housing Element Discussion

Questions

- What members of the community are most in need of housing and services?
- What are the unmet housing needs in Stanislaus County?
- What are the barriers to affordable housing in Stanislaus County?
- What can the County and community leaders do to address these needs and barriers?





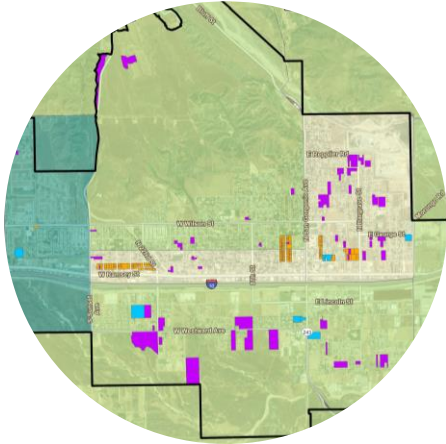
Stanislaus County

6th Cycle Housing Element Update

General Plan Update Committee Presentation

September 1, 2022 – 3:00 PM

What is a sites inventory?



The housing element of the general plan must include an inventory of land suitable and available for residential development to meet the locality's regional housing need by income level. (CA Gov. Code Sec. 65583.2)

6th Cycle Criteria

- Sites likely to redevelop/develop in next 8 years:
 - Vacant
 - Owner/developer interest
 - Low improvement to land value ratio
 - Low FAR if non-vacant
- Standards for lower income sites:
 - 0.5 and 10 acres in size
 - Allow at least 20 dwelling units/acre
 - Large enough to accommodate at least 16 units
 - Infrastructure-ready
 - Access to jobs, transit, and services



Sites Inventory Summary Table

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	574	398	458	1,045	2,475
Planned and Approved Units	0	0	0	317	317
ADUs	0	0	0	96	96
Remaining RHNA After Credits	574	398	458	632	2,062
4th and 5th Cycle Units*	23	15	91	219	348
Vacant & Nonvacant Units*	90	62	264	673	1,089
Potential Rezone*	698	484	215	0	1,397
Total Units After Credits	811	561	570	892	2,834
Total Unit Surplus	237	163	112	260	772
Total % Buffer above RHNA Allocation	41%	41%	24%		

*Lower income units distributed proportionally between very low and low-income based on RHNA allocation

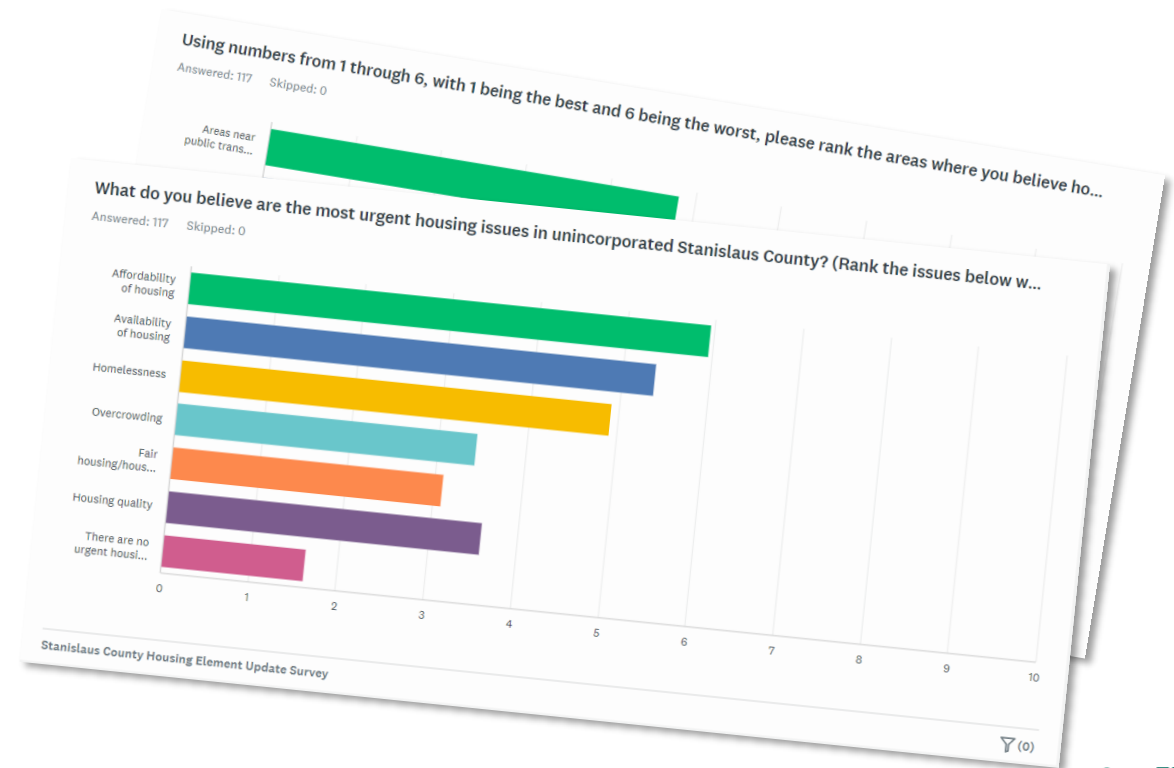


Preliminary Housing Survey Results

"Please rank (1-6) the areas where you believe housing should be developed in unincorporated Stanislaus County."

Top five responses:

1. Areas near public transit, employment, and shopping centers
2. Land that could be converted from commercial to residential or mixed-use
3. Vacant land on the edges of cities and unincorporated communities
4. Areas where there is existing housing
5. Agricultural land on the edges of cities and unincorporated communities



Implications from Rezone

Develop rezone program to:

- Permit owner-occupied and rental multifamily uses by right for developments in which 20% or more of the units are affordable to lower income households;
- Permit the development of at least 16 units per site;
- Rezone the identified parcels within 3 years and 120 days of the start of the Housing Element Cycle (April 2027).



Approaches to Meet Lower Income RHNA

- Rezone specific residential parcels
 - R-1 to R-3
 - R-2 to R-3
- Rezone specific commercial parcels
 - C-2 to C-1
 - C-2 to R-3
- Rezone Measure E parcels
 - Not needed to meet RHNA



Planning Sub-Areas Proposed for Rezone

- Bret Harte
- Denair
- Empire
- Grayson
- Keyes
- North Ceres
- Salida
- West Modesto



Additional Topics & Next Steps

- Environmental Justice Advisory Group
- Community Workshop #2 – Weds., Sept. 28th



Additional Slides



RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low	Low			
574	398	458	1,045	2,475

Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**



Sites Inventory

Units Needed:

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	574	398	458	1,045	2,475
Planned and Approved Units	0	0	0	299	299
ADUs	0	0	0	96	96
Remaining RHNA After Credits	574	398	458	650	2,080
5th Cycle Units*	43	29	99	308	479
Vacant & Nonvacant Units*	214	148	268	975	1,605
Potential Rezone*					0
Total Units in Inventory	257	177	367	1,283	2,084
Total Unit Surplus (Shortfall)	(317)	(221)	(91)	633	4



Maximum Residential Densities

Zone District	Max Residential Density
Residential	
R-A	1 du/3 acres*
R-1	8 du/acre**
R-2	14 du/acre**
R-3	25 du/acre**
Commercial	
C-1	25 du/acre**
Agriculture	
A-2	2 du/20 acres

*If the General Plan land use is Estate Residential, the minimum lot size is 3 acres. Otherwise, minimum lot size is 8,000SF.

**Maximums are subject to underlying General Plan land use and if parcel is connected to sewer and water.

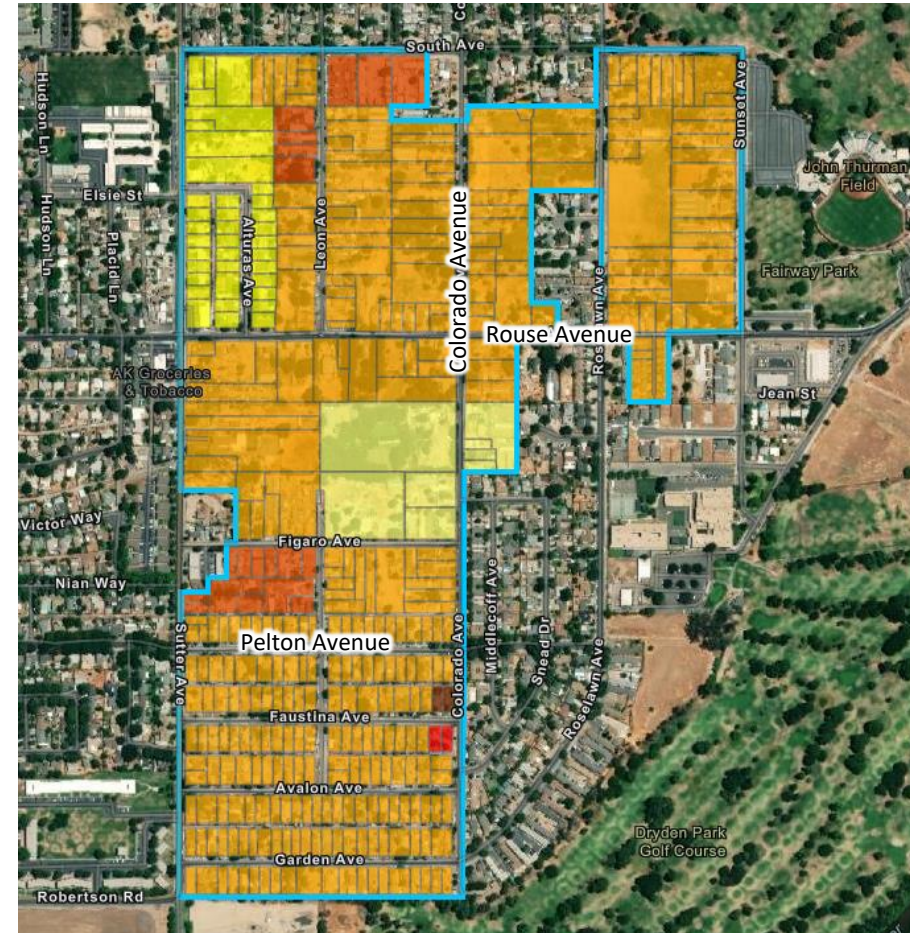


Approaches to Meet Lower Income RHNA

Example 1: Rezone Specific Residential Parcels

- R-2 to R-3
- R-1 to R-3

Example Area: Rouse/Colorado

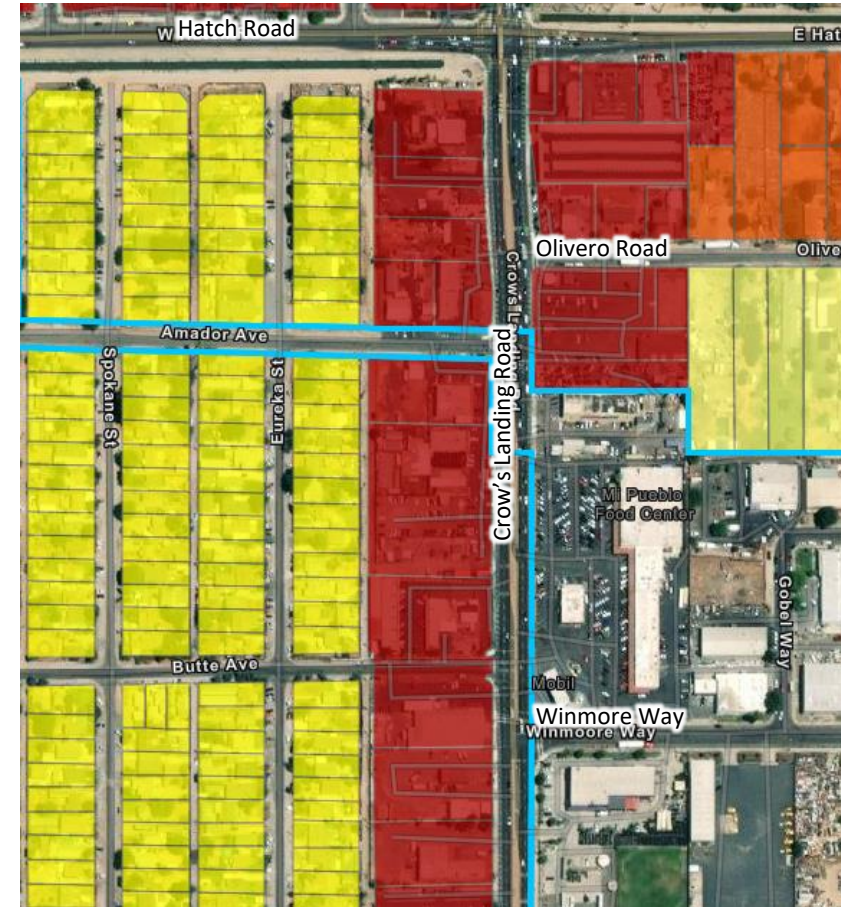


Approaches to Meet Lower Income RHNA

Example 2: Rezone *Specific Commercial Parcels currently zoned C-2*

- Vacant/underutilized
- 0.5 - 10 acres
- Must meet minimum 20 du/acre
- C-1, R-3, or new district

Example Area: Commercial Corridor

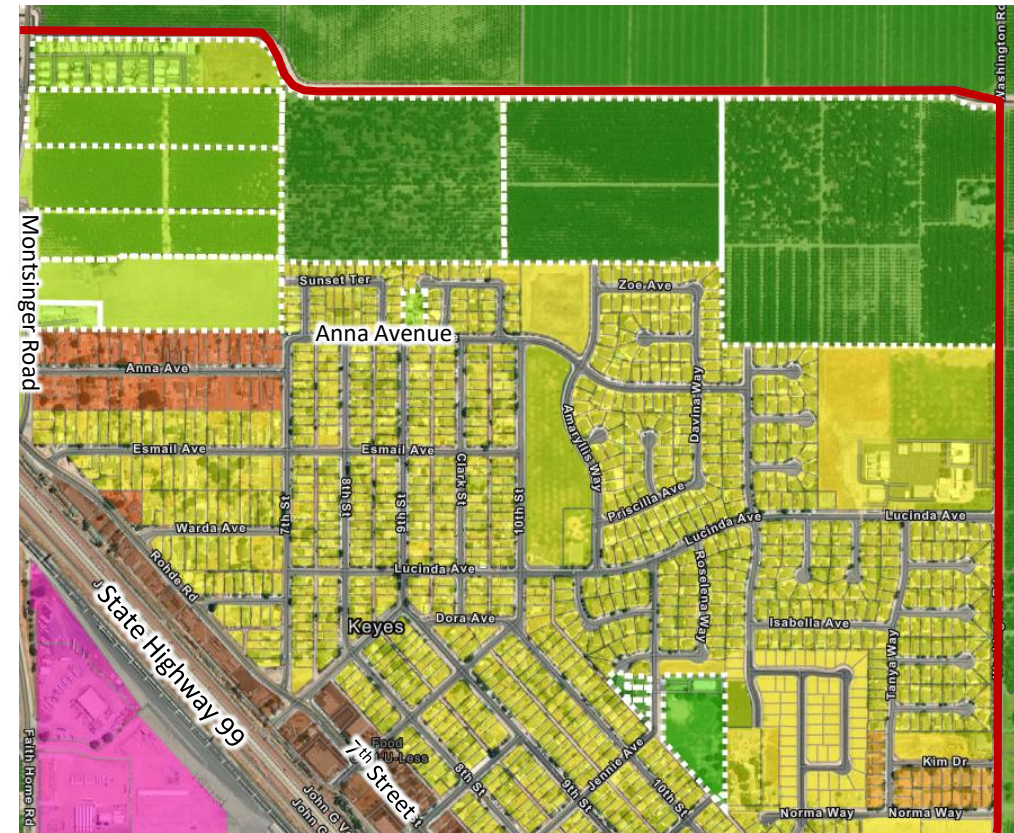


Approaches to Meet Lower Income RHNA

Example 3: Rezone Measure E exempt parcels

- A-2 to C-1 or R-3
- For parcels over 10 acres, a development agreement, specific plan, or inclusionary requirement may be needed (to meet lower income RHNA)

Example area: North Keys





Stanislaus County 2023-2031 Housing Element Update

Community Workshop #1

June 23, 2022, 6:00-8:00pm
(<https://us06web.zoom.us/j/86984953284>)

Join us for a virtual community workshop to discuss the Housing Element Update for unincorporated Stanislaus County and related updates.

Housing Element

The Housing Element is one of the State-mandated components of the County's General Plan. It provides a framework for the County to accommodate future housing needs, including planning for housing that is suitable for all income levels. The Housing Element has two main purposes:

- To provide an assessment of current and future housing needs for the next eight years.
- To establish housing goals, policies, and programs that direct housing needs, reduce barriers to development, and ensure compliance with State legislation.

Safety Element

State law requires jurisdictions to update the Safety Element upon revision of the Housing Element. The goal of the Safety Element is to reduce the potential short and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards.

Environmental Justice

In September 2016, Senate Bill 1000 was adopted to require jurisdictions with "disadvantaged communities" to incorporate environmental justice policies into their general plans. Disadvantaged communities are neighborhoods with low-income households that are exposed to pollution (e.g., freeways, landfills). State law requires environmental justice policies to be incorporated into the general plan upon the adoption of two or more general elements, which is required in the case of Stanislaus County.

Questions?

Contact:

planning@stancounty.com

Stay up to date! stancounty.com/housingelement

Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.



Actualización del Elemento de Vivienda del Condado de Stanislaus 2023-2031

Taller comunitario #1

23 de junio de 2022, 6:00-8:00 p.m.
(<https://us06web.zoom.us/j/86984953284>)

Únase a nosotros en un taller comunitario para discutir la Actualización del Elemento de Vivienda y actualizaciones relacionadas.

Elemento de Vivienda

El Elemento de Vivienda es uno de los componentes obligatorios del Estado del Plan General del Condado. Proporciona un marco para que el Condado se adapte a las necesidades futuras de vivienda, incluida la planificación de viviendas adecuadas para todos los niveles de ingresos. El Elemento de Vivienda tiene dos propósitos principales:

- Evaluar las necesidades de vivienda actuales y futuras para los próximos ocho años.
- Establecer metas, políticas y programas de vivienda que orienten las necesidades de vivienda, reduzcan las barreras al desarrollo y aseguren el cumplimiento de la legislación estatal.

Elemento de seguridad

La ley estatal exige que las jurisdicciones actualicen el Elemento de seguridad tras la revisión del Elemento de vivienda. El objetivo del Elemento de seguridad es reducir el riesgo potencial a corto y largo plazo de fallecimientos, lesiones, daños a la propiedad y dislocación económica y social como resultado de incendios, inundaciones, sequías, terremotos, deslizamientos de tierra, cambio climático y otros peligros.

Justicia ambiental

En septiembre de 2016, se adoptó el Proyecto de Ley 1000 del Senado para exigir que las jurisdicciones con "comunidades desfavorecidas" incorporen políticas de justicia ambiental en sus planes generales. Las comunidades desfavorecidas son los barrios con hogares de ingresos bajos que están expuestos a la contaminación (p. ej., autopistas, vertederos). La ley estatal requiere que las políticas de justicia ambiental se incorporen al plan general luego de la adopción de dos o más elementos generales, lo cual se requiere en el caso del condado de Stanislaus.

¿Tiene alguna pregunta?

Contacto:

planning@stancounty.com

¡Manténgase al día! stancounty.com/housingelement

Visite el sitio web del proyecto para registrarse en nuestra lista de correo electrónico. Vuelva a consultar periódicamente los anuncios de las reuniones, los materiales de los talleres y los documentos públicos para su revisión a lo largo del proyecto.

Upcoming Community Workshop

Where should housing be built?

You can help answer this question and guide the future of housing in unincorporated Stanislaus County!



Community Workshop

Tuesday, October 11, 2022
6:00 - 7:30 pm

Ceres Community Center
2701 4th Street
Ceres, CA 95307

Questions?

Contact:
planning@stancounty.com
209-525-6330

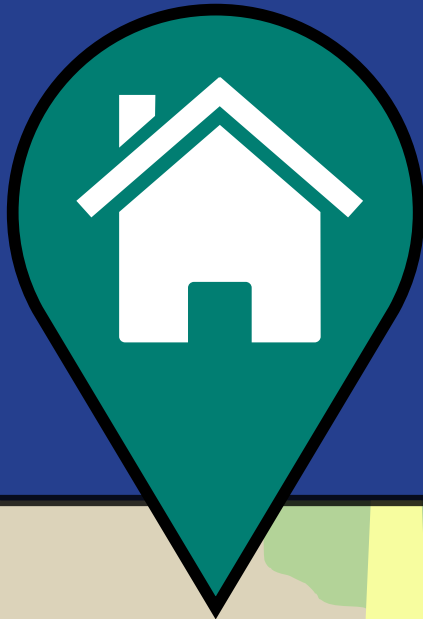
Stanislaus County is holding a community workshop to discuss the Housing Element Update, as well as the Safety and Environmental Justice Elements. The focus of the workshop is seek input on sites appropriate for the development of housing and to present information and initial findings related to the safety and environmental justice topics in the County. See you there!

Stay up to date! stancounty.com/housingelement

Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.

STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

Upcoming Community Workshop



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Visit: stancounty.com/housingelement

Attachment 4

Public Comments

Commenter	Topic	Comment
California Rural Legal Assistance, Inc.	Outreach	<p>The minimal and eleventh-hour outreach efforts on the part of the County do not represent a “diligent effort” to reach out to affected communities, and the County should take immediate steps to extend the public comment period and create a plan for obtaining meaningful feedback from the communities and population segments most affected by the proposed Housing Element update. In every Housing Element update, a jurisdiction is required to make and then describe its “diligent effort. . . to achieve public participation of all economic segments of the community in the development of the housing element.” A diligent effort means “going beyond simply giving the public an opportunity to provide input and should be proactively and broadly conducted through a variety of methods to assure access and participation.” As part of their obligation to affirmatively further fair housing, jurisdictions must also include a summary of their fair housing outreach capacity. This summary must describe the jurisdiction’s process for</p>
California Rural Legal Assistance, Inc.	Outreach	<p>Nearly every aspect of the County’s method of soliciting and obtaining public participation relied on technological literacy, isolating significant segments of Stanislaus County’s population included protected categories, such as people with disabilities, low income Latino communities, and people lacking technological infrastructure such people living in disadvantaged unincorporated communities. Many population segments with specific housing needs that must be addressed by the Housing Element suffer disproportionately from inadequate technological access or technological literacy. For groups such as</p>
California Rural Legal Assistance, Inc.	Outreach	<p>The first step to conducting diligent outreach is to inform the community of upcoming events via methods of communication the community uses and trusts. Using a mixture of media types is a well-known method for circulating information across diverse segments of the population. The County’s only methods of general public noticing for all Housing Element related events and publications, however, were flyers posted on the county’s website and social media accounts and circulated via email to the County’s email subscriber lists.⁸ For residents who do not engage with county processes on a regular basis, these are not accessible, obvious, or even plausible sources of information. The incredibly poor attendance to both workshops (discussed below) can likely be attributed to these incredibly narrow-</p>

California Rural Legal Assistance, Inc.	Outreach	<p>The County did not attempt to lead a discussion of the programs and policies of the previous housing element and which are working or not working, even though the June workshop would have been the most logical time to hold such a discussion as required by Housing Element law. The October, 2022 community workshop was the only publicly accessible event held in person during the Draft Element’s development. The workshop was held after work hours to enable participation, but was held in a location – the Ceres Community Center – that is neither within the unincorporated county, nor is a common or well-known location to local residents from outside of the city of Ceres. CRLA staff in attendance can confirm that a maximum of 10-15 people attended this event. When CRLA staff asked whether additional meetings could be held in person in other locations; or virtually; or in a hybrid setting to enable broader community participation, County staff responded that there were “no plans at that time” to do so. No plans were made, and no other in person events were held for Stanislaus County’s Draft 6th Cycle</p>
California Rural Legal Assistance, Inc.	Outreach	<p>The online Sites Inventory tool was purported to offer detailed, parcel by parcel assessment of proposed sites. In practice, however, it was both insurmountably confusing to many residents and failed to offer sufficient detail to enable practical usage for other residents who were able to grasp it as a tool. While the tool offered the ability to select (with difficulty) individual parcels and view certain information, no</p>
California Rural Legal Assistance, Inc.	AFFH	<p>The Fair Housing Assessment can help to identify both whether housing units are realistically likely to be developed and to assess whether impacts would be to reduce segregation or increase gentrification and segregation within and between communities. This information is critical for citizens to be able to form an understanding of the long term consequences of housing development and permitting decisions, and</p>
California Rural Legal Assistance, Inc.	AFFH	<p>Nonprofit organizations can provide important analysis and information relevant to the Housing Element process, but community residents are the ones whose lives will experience the long term health, economic, and opportunity impacts of the Housing Element’s policies and programs. As Appendix 1 indicates, the stakeholder meetings the County relied upon heavily for input into the Housing Element</p>

<p>California Rural Legal Assistance, Inc. AFFH</p>	<p>The Housing Element must include a Fair Housing Assessment.¹⁴ Among other components, the Fair Housing Assessment (FHA) must include a “summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and fair housing outreach capacity.” HCD’s AFFH Guidelines explain that this requirement is intended to demonstrate a jurisdiction’s ability to disseminate information related to fair housing and provide outreach and education to assure community members are aware of their fair housing rights.¹⁵ The summary should include:</p> <ol style="list-style-type: none"> 1) A listing of local, regional, and state agencies and organizations active in the locality 2) A description of primary activities and capacity for each entity, including actions taken by the locality, such as provision of dedicated resources 3) Evaluation of impacts on protected characteristics and demographic trends 4) Any additional relevant information about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region affecting groups with other protected characteristics.” The Draft Element
<p>California Rural Legal Assistance, Inc. AFFH</p>	<p>In assessing Fair Housing patterns and trends in Stanislaus County, local knowledge and data is critical to an understanding of current housing needs and to an evaluation of potential effectiveness of proposed actions to impact segregation. In addition to the summary of fair housing issues and assessment of fair housing enforcement and outreach capacity, the Fair Housing Assessment must include an “analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.” The analysis has to not only identify, but also “examine” the patterns, trends, areas, disparities, and needs both within the jurisdiction and in regional context, based on race and other protected characteristics. In its version of the Fair Housing Assessment,²² the Draft Housing Element presents maps and data from various sources</p>

California Rural Legal Assistance, Inc.	AFFH	<p>The Draft HE does not provide an internally consistent and accurate assessment of patterns and trends of integration and segregation of Stanislaus County’s diverse communities and citizens. HCD’s AFFH Guidelines specify several requirements for the FHA assessment of Integration and Segregation Patterns and Trends. The analysis must include patterns and trends related to people with protected characteristics, and must address integration and segregation to “holistically evaluate” patterns and practices and better identify and prioritize contributing factors. A strong analysis would address segregation and integration of households with lower incomes specifically, and at minimum, the analysis must touch upon segregation and integration in terms of race and ethnicity, income, familial status, and disability status. Finally, the analysis must identify which groups experience the highest level of segregation. Draft Housing Element Sections 3.6 through 3.8 attempt to address segregation and integration patterns in the aforementioned set of characteristics. Section 3.6, analyzing Race and Ethnicity segregation, claims both that “there are few areas of concentrated population by race/ethnicity in Stanislaus County” and that “the distribution of white and Hispanic majority census tracts is nearly split</p>
California Rural Legal Assistance, Inc.	AFFH	<p>With respect to racially and ethnically concentrated areas of poverty, HCD guidelines specify that the analysis “should evaluate the patterns and changes over time and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.” Section 3.9 of the Draft Housing Element identifies five Racially and Ethnically concentrated Areas of Poverty in Stanislaus County: Airport, Rouse, Bret Harte, Empire, and Bystrom.³⁰ There is no analysis of any pattern or change over time in these areas, nor of any past policies, practices, investments, and demographic trends that have resulted in these R/ECAP areas. Omitted from the narrative analysis (which is a paragraph in total) are a myriad of crucial facts. First, all five of these R/ECAPs are in the unincorporated pocket and island areas surrounding the southern boundary of Modesto. Airport, Bystrom, and Bret Harte are all in South Modesto/North Ceres, while Rouse is located in West Modesto and Empire is a community at Modesto’s far southeastern extreme off Yosemite Boulevard. With the exception of Empire due to its remoteness, every single one of the R/ECAPs exists in an unincorporated pocket surrounded by better-resourced communities that have been annexed into the cities of Modesto and/or Ceres, leading to the strange shape of Modesto’s western and southern borders. All five of the R/ECAPs are areas well known to be in dire need of infrastructure development ranging from sidewalks, storm drains, and streetlights to even basic sewer connections in some places. All five of them have been passed over for decades for investments in infrastructure, housing, and transportation. Bret Harte and Rouse are both, to this day,</p>

California Rural Legal Assistance, Inc. AFFH	<p>The Fair Housing Assessment must also address disparities in opportunity. HCD guidelines require that the analysis “individually address access to opportunity for education, transportation, economic development, and environment” in addition to evaluating total access to opportunity.³¹ The guidelines go on to state: “Patterns over time should be discussed as well as policies, practices, and investments that affect access to opportunity. Local data and knowledge and other relevant factors must be considered, including incorporating public outreach and targeted community engagement.” Section 3.11.1 of the Draft Housing Element identifies areas with the highest resources. The list includes the eastern communities of East Oakdale, Orange Blossom, Knights Ferry, and Hickman.³³ This section also identifies Airport and Bystrom as areas of high segregation and poverty. The only conclusion drawn from these basic map readings is that “access to opportunity varies widely throughout the county.”³⁴ As</p>
California Rural Legal Assistance, Inc. AFFH	<p>Assessment of disproportionate housing needs and especially risk of displacement must be based on local information and must provide a realistic assessment of these risks. On analyzing disproportionate housing needs, including displacement, HCD guidelines note that “particularly important to this analysis is local data and knowledge, since some areas could be impacted by market conditions that put households at risk of displacement, or pending or upcoming planning decisions may exacerbate displacement risk.”³⁵ Disproportionate needs that should be analyzed include overcrowding, overpayment, substandard housing conditions, and displacement. Section 3.12 of the Draft Housing Element and its subsections addresses disproportionate housing needs. This section finds that Rouse, Bystrom, and Bret Harte are the</p>

California Rural Legal Assistance, Inc. AFFH	<p>Careful analysis of disproportionate housing needs is particularly important in assessing possible risks of displacement, and the Draft HE does not provide adequate analysis in this arena. In addition to the general guidelines for analyzing Disproportionate Housing Needs, HCD has special rules and indicates a need for special attention to be paid to Displacement. HCD’s AFFH Guidelines highlight three key mechanisms of neighborhood change that must be analyzed to understand displacement as an issue: movement of people; public policies and investments such as capital improvements and transit stops; and flow of private capital.³⁶ One key concern is the possibility for investment driven displacement, which often disproportionately impacts people of color, lower income households, persons with disabilities, large households, and persons at-risk for or experiencing homelessness. The HCD explains that in a process that often follows decades of disinvestment, investment driven displacement can take place as a neighborhood undergoes a process of gentrification. This gentrification can arrive in the form of a flood of public and/or private sector investment which leads to real estate speculation, improvements in transit access, and changes in land use. These investments attract residents with higher incomes and higher educational attainments, displacing historic residents who cannot afford to remain and excluding them from any benefits of the sudden changes to their communities. In order to understand the risk of investment driven and other types of displacement, HCD suggests that the FHA must consider public infrastructure investments (e.g. transportation infrastructure improvements) and</p>
California Rural Legal Assistance, Inc. AFFH	<p>In certain sections of its FHA (see, e.g., Section 3.5 (page 3-11), Section 3.13.1 (page 3-82)), the Draft Element includes narrative historical information about patterns of segregation and discrimination throughout California and even Central Valley History. While this historical perspective is welcome as a starting point for meaningful discussion, the narrative inclusions are rendered useless by two key issues. First, they are kept completely separate from all data analysis, as demonstrated in the sections above, which prevents any positive contextualizing power of the historical perspective from meaningfully affecting any conclusions the FHA has drawn to this point. And second, the analysis offered in these</p>
California Rural Legal Assistance, Inc. AFFH	<p>Once the fair housing issues have been identified and examined, the FHA must include “an assessment of the contributing factors, including the local and regional historical origins and current policies and practices, for the fair housing issues identified [in the earlier parts of the FHA].”⁴⁰ These contributing factors must be considered later as part of the jurisdiction’s fair housing related goals and policies (Draft Element’s “Housing Plan” Section 5), to give priority to “factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance” and inform the “metrics and milestones used to determine what fair housing results will be achieved.” The Draft Housing Element lists a set of Contributing Factors and gives them a prioritization ordering. (Section 3.17, Draft Element 3-109). However, absolutely no summary explanation or rationale is given for the identification of these specific contributing factors over others present in the preceding analysis. Similarly, no</p>

California Rural Legal Assistance, Inc.	Constraints	Section 4 of the Draft Housing Element addresses constraints to development of housing in the County. Although Section 4 goes into sufficient detail to illustrate the regulatory constraints that justify the County's proposed rezoning, it fails to adequately identify or address the infrastructure deficits that are likely to become obstacles to the assumed housing development during the life of this Housing Element.
California Rural Legal Assistance, Inc.	Constraints	Section 4.3 attempts to address infrastructure constraints that may inhibit housing development. ⁴² The section provides some background regarding both the hypothetical infrastructure constraint issues and specific historical examples in Stanislaus county of infrastructure constraints and how they have been handled. However, the section fails to identify specific infrastructure deficits on a site-based or even area-based level adequate to illustrate what infrastructure constraints the current set of chosen sites is facing. This omission could render estimates of housing units to be grossly unrealistic. This is a fatal flaw to the
California Rural Legal Assistance, Inc.	Constraints	Section 4.4.2 of the constraints analysis addresses risk from Earthquakes, Landslides, and erosion, but curiously omits any discussion of flood risk, despite the high number of acres in western Stanislaus county in flood plains. ⁴⁴ This is a key environmental constraint on an even more consistent basis than earthquakes and should not be overlooked.

The duty to affirmatively further fair housing does not end at the Fair Housing Assessment – it extends fully and emphatically to the Sites Inventory. A jurisdiction’s sites inventory “... shall be used to identify sites throughout the community, consistent with...” its duty to affirmatively further fair housing. Sites must be identified and evaluated relative to the full scope of the assessment of fair housing. To evaluate the Sites Inventory’s consistency with the obligation to affirmatively further fair housing, the site inventory analysis should address both Improved Conditions resulting from siting and the Exacerbated Conditions resulting from siting, along with a consideration of local data and knowledge.⁴⁶ Local data and knowledge to be captured in analysis should include current, planned and past developments, investment, policies, practices, demographic trends, public comment, and other factors such as potential for displacement of residents and infrastructure capacity.⁴⁷ The analysis must ultimately address each of the fair housing issue areas: (1) segregation and integration, (2) racially and ethnically concentrated areas of poverty, (3) access to opportunity, and (4) disproportionate housing needs, including displacement. Critically, the duty to affirmatively further fair housing established in Gov. Code 8899.50 requires not only that public agencies affirmatively further fair housing, but also that they “take no action that is materially inconsistent with [their] obligation to affirmatively further fair housing.” Curiously, the Draft Housing Element chose to place its analyses of Improved and Exacerbated Conditions and the fair housing issue areas in the Fair Housing Assessment instead of in Section 5 (the Sites Inventory). Table 3-15 on page 3-91 shows how many lower-income, moderate-income, and above moderate-income housing units are planned for each census tract throughout the County. Some previously identified community areas, such as Airport, Empire, and Hickman, occupy single census tracts, while others like Bret Harte, North Ceres (includes Bystrom), Oakdale, and West Modesto (includes Rouse) contain multiple census tracts. This

California Rural Legal Assistance, Inc. AFFH

There are 15 census tracts classified as low resource or high segregation & poverty in the county: Airport, Bret Harte (3 tracts), Crows Landing, Empire, North Ceres (2 tracts, including Bystrom), South Ceres (2 tracts), Turlock, and West Modesto (4 tracts, including Rouse). (table omitted here, see page 16 of the letter). 944 out of the total 1,268 lower income units in the county have been allocated to these low resource and high segregation areas. Out of those 944, 608 (nearly 65%) are located in R/ECAPs alone, with an additional 211 in the “highest segregation and poverty” classified West Modesto tract 16.01, which contains the neighborhood of Spencer Marshall. At the same time as these areas have been

California Rural Legal Assistance, Inc. Sites Inventory

California Rural Legal Assistance, Inc.	Sites Inventory	<p>There are 7 census tracts classified as high or “highest” resource areas in the County: Del Rio, Denair, Hickman, Oakdale tracts 1.01 and 1.02, Salida tract 5.01, and Valley Home. These areas received the following unit distributions: (table omitted here, see page 17 of the letter). With the notable exceptions of Denair and Salida’s tract 5.01, there are absolutely no lower income or moderate-income units to be placed in any of the County’s highest resource areas. Areas such as Hickman and Oakdale, identified throughout the document as areas with the highest racial or ethnic concentration of affluence, are set only to receive above moderate income housing units. While the potential benefits of Denair and Salida receiving a mix of housing income should not be dismissed, their impact must be properly contextualized:</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>There are 5 census tracts classified as “moderate resource” in the County: Diablo Grande, Grayson, Census tract 27.01 in North Ceres, Census tract 2.03 in East Oakdale, and census tract 5.10 in Salida. These areas received the following housing unit distributions: (table omitted here, see page 18 of the letter). None of these areas are R/ECAPs, and all of these areas could have seen unit allocations designed to increase a mix of household income options. Instead, the County failed to allocate any lower income</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>(Table omitted here, see page 18 of the letter). This chart includes a subset of the lowest resource areas in the county that includes only R/ECAPs and the remainder of the low resource and high segregation areas around West Modesto. Bold and italics mark the three communities that are both low resource and have recently been allocated millions of dollars in ARPA and other funds for building community infrastructure, as explained earlier in these comments. By name, these neighborhoods are Bret Harte, Empire, and Rouse.</p> <p>Out of all the low-income neighborhoods on this list, the neighborhoods allocated the highest numbers of above moderate housing units are Bret Harte, Empire, and Rouse: there are 24, 43, and 54 above moderate-income units planned for each of them respectively. Rouse has also been allocated a remarkable 103 additional units of moderate-income housing, bringing its moderate and above moderate total to 154 units, more than any similar sum for any other community on this list. Rouse also received only 10 units of lower income housing allocation. Rouse, as has also been established earlier in the Draft HE, also happens to be the only West Modesto tract with multiple risk levels for displacement of low and very low-income residents – high risk and extremely high risk, respectively. By the Draft Housing</p>

California Rural Legal Assistance, Inc.	Sites Inventory	<p>Section 5 of the Housing Element does not provide an assessment of sites with a realistic potential for development, or enough spatial analysis to allow these sites to be assessed as to their capacity to address racially segregated housing or to serve affordable housing needs, and fails to provide other required analysis. California’s Housing Element Law requires that Housing Elements include: "An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality’s housing need for a designated income level, an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction’s duty to affirmatively further fair housing." The only specific sites identified and assessed are approved developments, none of which provide any low, very low, or severely low - income housing. No detailed analysis of low-income housing sites is included in the Housing Element. Instead of providing this level of analysis, the Stanislaus Draft Housing Element provides an inventory of more than 400 individual parcels (see Housing Element, Appendix C), most of which are less than one acre in size and thus are unlikely to be developed to include significant percentages of low or very low income housing. Instead of removing from this list those parcels unlikely to be developed due to size, or other factors, the Sites Analysis proposes to assess potential housing capacity by adding all acres and multiplying by density allowed under existing zoning to come up with the “realistic” capacity for development, allowing for a variation based on typical densities for past multifamily developments. The result is an assumed number of available housing units to meet RHNA housing units needed without any</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>Sites smaller than half an acre are subject to their own realistic site capacity analysis. Under Housing Element Law, “a site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>In addition to small sites, sites larger than 10 acres are also subject to their own realistic site capacity analysis. Sites larger than 10 acres cannot be used to accommodate lower income housing need unless the locality can demonstrate that “sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site” or if the locality is able to present other evidence to convince HCD that it is developable as lower income housing. Although they are each technically smaller than 10 acres, the 5 sites along Tucson Avenue</p>

California Rural Legal Assistance, Inc.	Sites Inventory	<p>For nonvacant sites, the Sites Inventory must first and foremost provide a description of the existing use of the property. 68853.2(b)(3) Secondly, jurisdictions are now required to undergo additional analysis to specify the “additional development potential” for each site within the planning period and provide and explanation of the methodology used to develop that potential.⁵³The methodology has to consider factors including “the extent to which existing uses may constitute an impediment to additional residential development, the city’s or county’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use,”⁵⁴ and others. An additional wrinkle to this rule applies when a jurisdiction uses nonvacant sites for over 50% of its RHNA. When this is the case, the methodology used to development potential must further demonstrate that “the existing use identified [for the nonvacant site] does not constitute an impediment to additional</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>Where the Sites Inventory does not identify adequate sites to accommodate the need for farmworker housing, the Housing Element must “provide for additional sites to meet the need with zoning that permits farmworker housing use by right, including density and development standards that could accommodate and facilitate the feasibility of the development of farmworker housing for low- and very low-income households.” Although a Farmworker Housing program is included as Program 4-2 in the Housing Plan (6-23) and Section 2.5.2 regarding Farmworker needs specifically mentions how challenging it is for Farmworkers to compete for housing⁵⁷, no mention is made of Farmworkers whatsoever in the</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>Government Code section 65583.2(b)(5)(B) requires that Housing Element site inventories and analyses include assessment of whether adequate infrastructure exists to make development feasible in the planning horizon. This can either be in the form of existent infrastructure, or via inclusion in a “general plan program or other mandatory program or plan to secure sufficient water, sewer, and dry utilities to support housing development.” The Sites Inventory includes more than 400 sites, 237 of which identify infrastructure as “potential.” (see Appendix C, Table A). This does not meet the statutory requirement</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>No digital database of the site inventory was made available for public review during the comment period. Only a PDF file was made available. Because of the failure on the part of the County to narrow down the list of parcels to those with a realistic potential for development in the HE planning horizon, a PDF file with hundreds of parcels cannot realistically be assessed by reviewers. CRLA was able to obtain</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>The sites inventory does not identify the geographic location of ADUs. While the Sites Analysis does not rely upon ADUs as making any contribution to low income housing, the failure to identify location or analyze socio-economic details of this housing and the communities in which it is located makes it impossible to analyze the effects of the ADUs on segregation or affordable housing in the county as a</p>

California Rural Legal Assistance, Inc.	AFFH	Government Code section 65583.2(b)(4) requires that a Housing Element provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites. Guidance provided by HCD’s “Housing Element Site Inventory Guidebook” further clarifies the requirement: "The housing element need only describe those environmental constraints where documentation of such conditions is available to the local government. This analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities. This information need not be identified on a site-specific basis. However, local governments will find it beneficial to describe site specific environmental conditions when demonstrating site suitability and realistic buildout capacity of each site, as these types of impediments to building must be considered when determining how many residential units can be developed on the site." The Draft Housing Element’s analysis of Environmental Constraints in Section 4.4 consists of a paragraph that is shorter in length than HCD’s direction regarding how such constraints should be identified. This paragraph references an “Environmental Justice Technical Report” without providing any citation, link, or
California Rural Legal Assistance, Inc.	Programs	Policies 1A and 1E reiterate the County’s already existing duty to enforce its own housing and building codes.
California Rural Legal Assistance, Inc.	Programs	Policy 1D requires the County to preserve at-risk units of publicly assisted affordable housing. ⁶⁴ However, the County previously stated at multiple points in the Housing Element that there is no publicly assisted affordable housing stock in the unincorporated county, which seems to render this Policy and Program 1-4 purely hypothetical. ⁶⁵ Clarification should be added to indicate if there are aspects of this
California Rural Legal Assistance, Inc.	Programs	Action 1-1a requires the county to provide housing rehabilitation assistance, but at a rate of only three households helped per year. This rate is too low.
California Rural Legal Assistance, Inc.	Programs	Action 1-1c requires only the maintenance of a pre-existing program.

California Rural Legal Assistance, Inc.	Programs	Programs 1-2 and 1-3 require the County to update local laws to comply with regulations already in place at the state level – these are legal obligations the County would have regardless of their inclusion as programs in the Housing Element.
California Rural Legal Assistance, Inc.	Programs	Low-income tenant protections have proven time and again to be one of the most effective ways to preserve the existing affordable housing in a jurisdiction. Some possible programs to this effect may include: -Rent Stabilization Program (including for mobile home parks). -Good cause eviction ordinance. - Ordinance prohibiting discrimination against recipients of Section 8 and other rental housing subsidies. -
California Rural Legal Assistance, Inc.	Programs	Since displacement is a high priority issue in the County, programs to prevent displacement could also be helpful here: oExpanding By Right Approval Program (3-4) to types of sites beyond those prescribed by statute. -Neighborhood Land Banking Program. -Program to proactively facilitate the purchase of at-risk properties by local nonprofit developers, community land trusts, and/or tenant organizations. -
California Rural Legal Assistance, Inc.	Programs	In addition to the requirement to conserve and improve the condition of existing affordable housing stock, the Housing Plan is required to “assist in the development of adequate housing to meet the needs of extremely low, very low, low- and moderate-income households.” One of the Housing Plan’s methods of addressing this requirement is the set of programs under Goal 2. There are several good programs here – the Density Bonus Law update is a mandatory but positive step toward making affordable housing happen, the steps described in Program 2-1 to assist affordable housing developers are on point and useful, and the Housing Trust Fund, if it is actually created, will be a welcome addition to the affordable housing resources available in Stanislaus County. The only significant issue under Goal 2 is Action 2-2b, the County’s plan to “discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond state law is appropriate for the County.” ⁶⁷ Increasing the Density Bonus for market-rate projects beyond state law is impermissible under
California Rural Legal Assistance, Inc.		Due to inadequacies in community outreach and public engagement, the Fair Housing Assessment, the Sites Inventory, and throughout the Draft Housing Element, we strongly recommend that the Draft Housing Element be revised prior to submission to the HCD. Because of the large number of proposed rezones and the likelihood that the proposed actions will still fall short of meeting housing targets, we suggest that Stanislaus County delay finalization of the Housing Element until better site analysis can be completed that yields a more concrete proposal for achieving housing goals. The Housing Element
Community Member	Sites Inventory	I want to include my property in the 6th cycle of Stanislaus county Housing Element. My property 16245 Clover Ave Patterson Ca 95363 with APN: 048-038-027 is in the county limits and within the sphere of influence of City of Patterson. 16245 Clover Ave Patterson Ca 95363 is in General AG 20 zoning with

Community Services Agency	Chapters 2, 3, & 6	<p>Page 2-31 – in the first full paragraph services offered for prevention are CalFresh and Medi-Cal. You can also add CalWORKs which is cash aid for families. CHS provides shelter, transitional housing and rapid rehousing for youth and their children, not to all individuals and families.</p> <p>· Page 3-78 – Missing is the Access Center Emergency Shelter, Organization is Salvation Army, 330 9th Street, Modesto, CA 95351. Total beds is 180</p>
Department of Environmental Resources	Chapter 4	<p>Page 171 Table 4-3: In the footnote section, the source was cited to be the zoning ordinance. However, to strengthen our case, I recommend that we also cite Stanislaus County LAMP as the LAMP is the spin-off of the State’s OWTS Policy. Page 175 In the Farmworker/Employee Housing section, the following verbiage was mentioned, “The County Department of Environmental Resources is responsible for permitting, inspection, and reinspections of all employee housing, labor camps, dairy farm labor camps, and labor supply camps, pursuant to Health and Safety Code, Division 13, Part 1, also known as the Employee Housing Act, and California Code of Regulations, Title 25, Division 1, Chapter 1, also known as the Employee Housing Regulations.”</p> <p>I recommend it gets replaced with “The County Department of Environmental Resources is responsible</p>
Modesto Irrigation District	Utilities	<p>Del Rio</p> <p>☒ There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Swim ID – ID No. 163) that lies within the proposed property housing site parcel, APN 004-001-057.</p>
Modesto Irrigation District	Utilities	<p>Empire</p> <p>☒ There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Townsite ID – ID No. 18) that crosses S. Abbie St east to west near or within the proposed housing sites.</p> <p>☒ There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Townsite ID – ID No. 183) that comes off of the ID No. 18 pipeline and heads south, east of S. Abbie St. and lies near or within the proposed housing sites.</p> <p>☒ There is an existing thirty (30) inch private concrete pipeline that travels south along the west side of S. Abbie St.</p> <p>- MID owns an existing thirty-six (36) inch concrete pipeline known as the Highline Pipeline that lies near or within the proposed housing sites north of Yosemite Boulevard.</p>

Southwest Modesto

☒ MID owns an existing sixteen (16) inch mortar lined steel domestic water transmission pipeline that travels in the south to north direction along Sutter Ave.

☒ MID owns an existing thirty (30) inch concrete pipeline known as the Wooten Ditch Pipeline that lies near or within the proposed housing sites in the southwest Modesto area.

☒ There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Rogers ID– ID No. 44) that comes off of MID’s Wooten Ditch Pipeline and heads west towards Colorado Ave.

☒ There is an existing sixteen (16) inch concrete Improvement District (ID) pipeline (Rogers ID – ID No. 44) that comes off of MID’s Wooten Ditch Pipeline and heads west towards Colorado Ave.

☒ There is an existing twenty (20) inch concrete Improvement District (ID) pipeline (Wooten Ditch ID – ID No. 142) that branches off of MID’s Wooten Ditch Pipeline in two (2) separate locations.

☒ There is an existing thirty-six (36) inch abandoned in place pipeline that lies near or within the vicinity

Modesto Irrigation
District

Utilities

High voltage is present within and adjacent to the project area. This includes 115,000 & 69,000 volts overhead transmission, 12,000 volts overhead and underground primary, 6,900 volts underground primary, as well as overhead and underground secondary facilities and overhead fiber optic cable. Use extreme caution when operating heavy equipment, using a crane, ladders, scaffolding, handheld tools, or any other type of equipment near the existing MID electric lines and cables. Workers and equipment should always maintain a distance no less than 10 feet from overhead facilities. Assume all overhead and underground electric facilities are energized.

- Existing MID easements for protection of overhead and underground electrical facilities are to remain. Overhead secondary cable is protected by a minimum 20’ wide easement centered on the overhead cable. Overhead primary cable is protected by a minimum 30’ wide easement centered on the overhead cable. Underground secondary cable is protected by a minimum 5 foot. wide easement centered on the underground cable. Underground primary cable is protected by a minimum 10 foot. wide easement centered on the underground cable.

Modesto Irrigation
District

Electrical

- MID easements for protection of overhead and underground electrical facilities are required. MID

		<p>The following government statute guides the county as to which sites should be included in the final inventory.</p> <p><i>Gov. C. 65583(a)(3)An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality’s housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction’s duty to affirmatively further fair housing.</i></p> <p>Section HE-62 of the adopted 5th cycle Housing Element includes the zoned residential land encompassed in the Salida Community Plan. However, in the draft 6th cycle, this land has been removed from the draft “due to the inability to advance infrastructure development over the previous Housing Element Cycle.” (Page 4-36) The county should reject removing or “demoting” the Salida Community Plan from the draft. Domestic water infrastructure for the Salida Community Plan is dependent on the City of Modesto’s Water Master Plan. Progress on reaching an agreement for the City of Modesto to supply water to the Salida Community Plan will only be achieved after Modesto adopts a new General Plan and</p>
Salida Resident	Chapter 4	It is imperative that cities and counties include as many high or highest resource sites as possible in their Housing Element site inventory. The ratio of these sites to other lower resource sites should be 1:1. The City/County should overlay the high opportunity zones on the housing inventory map to determine sufficient high opportunity sites are included and/or identify additional high opportunity sites to be
Self-Help Enterprises	AFFH	We encourage City/County partners to adopt a program to review all surplus property within one year of adoption of the Housing Element and make those sites available for the development of affordable housing. There are provisions in the Surplus Land Act (SLA) which allow for an expedited process for sites that qualify as “exempt surplus land” which is land determined by a local agency and verified by HCD and
Self-Help Enterprises	Programs	Increasingly, we have found it expedient to utilize “by right” pathways to project approvals through density bonus law, SB 35 permit streamlining, and the Housing Accountability Act. Frivolous and NIMBY-driven CEQA challenges have been “discovered” in valley communities to delay and sometimes kill
		impressive inventories of available sites, when in fact most have no feasibility for development. Suitable sites must include:
Self-Help Enterprises	Sites Inventory	<ul style="list-style-type: none"> a. Sewer, water, and dry utilities proximate to the site in question, without a need for upsizing or significant offsite development. b. A significant portion of the available acreage in the adequate sites inventory (at least 50%) should have minimum parcel sizes of 2.5 to 3 acres (and larger if onsite storm drainage is required.)
Self-Help Enterprises	Programs	The City/County should consider adding a program to revise its zoning ordinance to add Manufactured Home on a Permanent Foundation to be allowed in all zones that allow singlefamily residences. The

Self-Help Enterprises Programs

The City/County should consider a fee waiver program for projects that include 100% affordable housing serving households below 80% of area median income. If the City/County is unable to waive fees, we strongly encourage deferral for a period not to exceed 30 years with the deferral recorded as a form of deferred note and secured by the property for affordable single-family housing development and 55

Appendix B

Review of Past Accomplishments

Review of Past Accomplishments

To develop appropriate programs to address the housing issues identified in the 2023-2031 Housing Element, Stanislaus County reviewed the housing programs adopted in the 2015-2023 Housing Element and evaluated the effectiveness of these programs in delivering housing services and assistance. Table 1 summarizes the County's construction goals and accomplishments during the 5th cycle planning period and Table 2 provides a detailed program-level assessment of housing accomplishments over the 5th cycle planning period.

Overview of Accomplishments

During the 5th cycle Housing Element, the County implemented numerous programs to support market rate and affordable housing production, homeownership, preservation of existing housing stock, and tenant protection. A full list of programs is included in Table 2. Most notably, as of December 31, 2022, the County implemented the following:

- **Homeownership:** Three new homes were sold to First-Time Homebuyers. One homebuyer received counseling.
- **Interagency support and coordination:** The County continued to participate in the City of Turlock/Stanislaus Urban County Home Investment Partnerships Program (HOME) Consortium and to serve as the lead entity for the Stanislaus Urban County. The County was awarded SB 2 planning grant program funds, Local Early Action Planning (LEAP) grant funds, Regional Early Action Planning (REAP), and Permanent Local Housing Allocation (PLHA) program funds. The County continues to participate in the Continuum of Care (CoC) by serving as the administrative entity for California Emergency Solutions Grant (ESG) funding programs for people experiencing homelessness and coordinating the programming of Stanislaus Urban County ESG funding with the CoC. A regional housing strategy effort, Housing Stanislaus, was undertaken in an effort to begin to formulate a countywide vision and strategy framework for accelerating affordable market-rate housing in Stanislaus County. A housing plan has been drafted and a housing summit releasing the Housing Stanislaus plan will be held in November 2023. The Department is also working with the County's Behavioral Health and Recover Services to issue a Request for Proposals/Request for Qualifications for on-call housing services and potential housing development projects.
- **Affordable Housing:** The County partnered with the Stanislaus County Housing Authority (HACS) to construct six affordably restricted units on three vacant properties the County acquired through the Neighborhood Stabilization Program funds. Additionally, two Neighborhood Stabilization Program (NSP) homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. The County contributed approximately \$3 million in NSP funding for the construction of the Oak Leaf Meadows project in the City of Oakdale, which consisted of 56 multi-family affordable housing units; construction was completed in December of 2020. The County provided \$1,097,233 in PLHA funds, in the form of a grant, to the Stanislaus Regional Housing Authority (SRHA) for the Central Valley Homes Development Project located at 413 Vine Street, in the City of Modesto, for the development of 15 permanent supportive housing units for households with incomes at 30 percent of the area median income (AMI).

- **Homelessness:** As the Urban County lead the County provided ESG funds to homeless services providers who served an average of 32 individuals per year with rapid re-housing services, 50 individuals with homeless prevention services, and 503 individuals with emergency shelter services throughout the Urban County member jurisdictions. One housing-related rezoning application was approved, allowing 22 units of an existing 90-unit migrant center to be used as temporary housing for homeless families during the winter months.
- **Enforcement:** The County continues to investigate building and zoning code violations and implement Title 24 of the California Building Code. The Building Division processed 38 dangerous and abandoned building cases and investigated approximately 440 housing related building complaints throughout the planning period. The Code Enforcement Division of the Environmental Resources Department also conducted inspections on housing complaints throughout the planning period.
- **Farmworker Housing:** Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single-family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. A farmworker housing ordinance was drafted; however, State laws regarding the permitting of farmworker housing continue to be allowed in the interim period before the farmworker housing ordinance is adopted.
- **Fair Housing:** As the Urban County lead, the County contracted with Project Sentinel for fair housing services who assisted with an average of 399 fair housing and tenant/landlord referrals, 12 housing cases, and 32 tenant/landlord cases per year for all Urban County member jurisdictions which includes unincorporated Stanislaus County and the cities of Ceres, Hughson, Oakdale, Newman, Patterson, Riverbank, and Waterford.
- **Accessory Dwelling Units (ADU):** The County approved 98 building permits for ADUs (70 of which were finalized) throughout the planning period.
- **Housing Rehabilitation:** The Housing Rehabilitation Program is implemented by the HACS using Community Development Block Grant (CDBG) and HOME funding; 15 households were assisted with rehab throughout the planning period of which 7 were low- and very low-income households.
- **Infrastructure:** The Parklawn Neighborhood Sewer Project and Airport Neighborhood Sewer projects were completed during the planning period. The first phase of the West Modesto Sewer Infrastructure Project was also completed. 160 sewer connections were issued building permits, including: 123 in the Airport Neighborhood, 27 in the Parklawn Neighborhood, 9 in the Robertson Road Neighborhood, and one in the Spencer/Marshall Neighborhood.
- **Housing Related Land Use Actions:** A comprehensive update to the General Plan was adopted in August of 2016. Zoning Ordinance updates addressing compliance with State laws regarding density bonus regulations, reasonable accommodations, and by-right approval of emergency shelters were adopted in 2016 and an ADU ordinance was adopted in 2021. The County approved 9 subdivisions (tentative maps) creating a total of 299 parcels of which four tentative maps included a rezone to Planned Development to allow for flexible design standards, one tentative map permitted the construction of five duplexes. Two of the approved maps were recorded and have begun construction of residential units and three other tentative maps are in the late stages of recording their final maps.
- **Streamlined Project Review:** Building permit streamlined review continued to be offered through the one-stop permit program by Building, Planning, Fire, Public Works, and DER staff throughout

2016. Building permits were made available online, customer appointments were implemented as a method for streamlining project submittal, pre-plan checked accessory dwelling unit plans were made available free of charge to residents of unincorporated Stanislaus County, and an online permit guide was launched on the County's website.

- **Fees:** In 2019 and 2020, the Board of Supervisors adopted updates to the Public Facility Fees to incorporate a lower fee for ADUs, a one-year Public Facilities Fees (PFF) waiver for ADUs constructed on properties that are owner occupied, a fee waiver for ADUs 750 square feet and less in size, and an alternative method for calculating ADU PFF which is based on the square footage of the main dwelling. Public facility fee deferrals continued to be offered as an option for low-income housing developments through the planning period. The County's PFF Committee approved two PFF waivers for affordable housing developments, one in the City of Modesto which includes 12 senior housing units available to low and very low-income households, and the other was in the City of Turlock which will be providing 22 units for low- and very low-income households.

Effectiveness in Addressing Special Needs

Special needs communities are demographic or occupational groups that call for specific program responses to address unique housing needs. State law specifically requires analysis of the special housing needs of people who are elderly or disabled (including developmental disabilities), female headed households, large families, farmworkers, and people experiencing homelessness. These special-needs groups often spend a disproportionate amount of their income to secure safe and decent housing and are sometimes subject to discrimination based on their specific needs or circumstances.

Stanislaus County's 5th cycle housing element addressed special needs populations through actions under *Program 1-4 – Stanislaus COC*, *Program 1-8 – Housing for Special Needs Populations*, *Program 2-1 – Residential Accessibility*, *Program 2-3 Funding and Technical Assistance for Special Needs Housing*, *Program 2-5 – Farmworker Housing in Agricultural and Other Zones*, *Program 2-6 – State and Federal Housing Programs for Farmworkers* *Program 2-8 – Universal Design*, *Program 4-6 – Extremely Low-Income Housing*, and *Program 4-8 – Emergency Shelter Capacity Monitoring*. These programs proactively address the identified special housing needs of the community, which include seniors, low-income families, and unhoused residents. During the 5th cycle, the County took the following actions to address special needs housing as of December 31, 2022:

Stanislaus County continued to participate in the CoC by serving as the Administrative Entity for the State's ESG funding programs for people experiencing homelessness and coordinating the programing of Stanislaus Urban County ESG funding with the CoC.

- The County utilized NSP funds to fund affordable housing developments for very low-income households and for disabled veterans. CDBG Public Service Grants, and Emergency Shelter Grants were also used to assist with emergency food, shelter and utility assistance.
- Staff provided technical assistance, responding to inquiries, and provided educational and support materials in person and electronically for clients with special needs. On average the ESG program served 29 Veterans, 46 Victims of Domestic Violence, 34 Seniors, one person with HIV/AIDS, 143 Chronically Homeless, and 380 persons with disabilities annually throughout the Urban County member jurisdictions.

- Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. Within Stanislaus Urban County, individuals experiencing homelessness were placed into rental housing and connected with services such as Temporary Assistance for Needy Families (TANF), Food Stamps, Veteran’s Benefits, and employment opportunities. Households at-risk of becoming homeless were also assisted with rental assistance, utility arrears, and financial and employment counseling services. ESG funds and programs were used to provide emergency and transitional shelter to hundreds of housing insecure individuals.

Quantified Objectives

Table 1 summarizes the County’s progress toward meeting the previous 5th Cycle Housing Element RHNA as of July 2023. Stanislaus County did not reach its 5th cycle RHNA goals in the Very Low-, Low-, Moderate-, and Above Moderate-Income categories.

Table 1 Quantified Housing Objective and Achieved Accomplishments

	New Construction		Rehabilitation	
	RHNA (2015-2023)	Actual	Objectives	Actual
Very Low-Income	538	0	-	-
Low-Income	345	32	-	-
Moderate-Income	391	109	-	-
Above Moderate-Income	967	617	-	-
Total	2,241	758	30	15

Review of Past Accomplishments

This section provides a program level assessment of housing accomplishments during the 5th cycle Housing Element planning period, which spans 2015 to 2023. Government Code Section 65400 requires that each city or county prepare an annual progress report (APR) on the status of its current housing element and progress of its implementation. Table 2 provides an overview of the current status and progress of each program using available online resources and data provided by the County as well as the appropriateness to further continue each program into the next housing element cycle. This assessment is not intended to be a full analysis, but instead, an initial pass at the programs that need to be kept or modified based on our knowledge of current housing law and best practice. Expansion of programs or the addition of new programs beyond what has been identified in this memo may be required as further analysis and input is provided during the process.

Table 2 Housing Program Progress Analysis

Housing Program	Program Progress	Continued Appropriateness
<p>Program 1-1 First-Time Homebuyers: Continue to utilize available federal and state funds for first-time homebuyer programs.</p>	<p>During the 5th Cycle Housing Element, three homes were sold to eligible first-time home buyers.</p>	<p>Program 1-1 has been carried over into Program 2-4 – Support Homeownership Opportunities in the 6th Cycle Housing Element.</p>
<p>Program 1-2 Interagency Coordination and Support: Continue to work in collaboration with federal, state, and local governmental agencies, as well as with private, nonprofit organizations and other community groups, to coordinate and build the capacity of local and regional housing programs, maximize funding opportunities, identify common housing goals and needs for targeted income groups, and to develop and implement affordable housing projects throughout the county.</p>	<p>Stanislaus County has continued its coordination and support with the City of Turlock for the Home Investment Partnerships Program (HOME) Consortium to ensure the development and implementation of affordable housing. Stanislaus County was awarded SB 2 program funds, Local Early Action Planning (LEAP) grant funds, Regional Early Action Planning (REAP), and Permanent Local Housing Allocation (PLHA) program funds, which include funding for the development of housing related planning efforts and housing production activities.</p>	<p>Program 1-2 has been carried over into Program 2-6 – Regional Collaboration to Facilitate Housing Throughout Stanislaus County in the 6th Cycle Housing Element.</p>
<p>Program 1-3 Homebuyer Counseling: Continue to participate with agencies that provide first-time homebuyer training.</p>	<p>During 2015 one homebuyer received counseling. Between 2016-2020, no homebuyer counseling was provided. With the increase in housing prices there has been a reduction in interest by very low-, low- and moderate-income households in receiving homebuyer assistance programs.</p>	<p>Program 1-3 has been carried over into Program 2-4 – Support Homeownership Opportunities in the 6th Cycle Housing Element</p>
<p>Program 1-4 Stanislaus County Continuum of Care: Continue to participate in the Stanislaus CoC to coordinate with low-income housing producers and advocates, social service providers, representatives of public agencies, and other interested organizations. This collaborative meets regularly, as determined by the Stanislaus CoC Executive Committee, to generate input and promote solutions to housing and supportive service issues on a community-wide basis.</p>	<p>Stanislaus County has continued their effort in the Urban County (UC) and CoC in funding programs for people experiencing homelessness. The UC is participative in Homeless Point in Time count and works with the Community System of Care (CSOC) to implement the Coordinated Entry System. Since 2017, Stanislaus County has been awarded funding for their work as an Administrative Entity for the State’s Emergency Solutions Grant program.</p>	<p>Program 1-4 has been carried over into Program 4-3 – Homelessness in the 6th Cycle Housing Element.</p>

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Housing Program	Program Progress	Continued Appropriateness
<p>Program 1-5 Building Code and Housing Enforcement: Continue to enforce federal, state, and local laws such as the International Property Maintenance Code, California Housing Code (under Division 13 of the CA Health and Safety Code), Title 24 California Building Standards Code, and Title 16, Buildings and Construction of the Stanislaus County Code to ensure minimum health and safety standards in housing or other buildings.</p>	<p>The County’s Department of Environmental Services continues to receive and investigate complaints of building code violations and enforce the International Property Maintenance Code. The Department of Planning and Community Development’s Building Division processed 38 dangerous and abandoned building cases and investigated approximately 440 housing related building complaints throughout the planning period.</p>	<p>Program 1-5 has been carried over into Program 1-2 – Residential Compliance Program in the 6th Cycle Housing Element.</p>
<p>Program 1-6 Density Bonus: Encourage the inclusion of affordable housing in proposed developments by offering incentives to developers consisting of density bonuses in compliance with California Government Code Sections 65915 - 65918.</p>	<p>A density bonus ordinance was adopted in 2016. The County received inquiries, but no formal density bonus requests.</p>	<p>Program 1-6 has been carried over into Program 2-1 – Density Bonus in the 6th Cycle Housing Element.</p>
<p>Program 1-7 Building and Design Standards for residential Energy Conservation: Continue to promote the reduction of energy usage and costs through building and design practices that meets the minimum standards of Title 24, encourage conservation of energy resources and utilization of alternative energy resources, and incorporate energy- efficient features in assisted dwelling units and through partnerships with other agencies and energy providers who disburse information and/or offer programs and incentives to increase public awareness and utilization of energy conservation practices.</p>	<p>The County has continued the implementation of Title 24 of the California Building Code, which includes the Green Building Code, and updated the code in 2019.</p>	<p>Program 1-7 has been carried over into Program 1-3 – Building and Design Standards for Energy Efficiency in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 1-8 Housing for special needs Populations: Continue to support countywide efforts to increase the inventory of affordable and accessible housing for special needs populations including seniors, persons with disabilities, families with female heads of household, large families, farmworkers, homeless and other residents with special needs.</p>	<p>NSP funds were used to fund affordable housing developments for very low-income households and housing units for disabled veterans. CDBG, Public Service Grant, and Emergency Shelter Grants were also used to assist with emergency food, shelter and utility assistance.</p>	<p>Program 1-8 has been carried over into Program 4-1 – Housing for Special Needs Populations in the 6th Cycle Housing Element.</p>
<p>Program 1-9 Affordable Housing Development in the Salida Community Plan: Maximize affordable housing potential in the Medium Density Residential (1,255 units) and Medium-High Density Residential (643 units) designations in the Salida Community Plan area. Due to the large volume of land designated Medium and Medium High Density Residential in the Salida Community Plan area and its potential to greatly increase the supply of housing affordable to extremely low-, very low-, and low-income households, the County will initiate contact and continue to partner with affordable housing developers to maximize the potential of the affordability of homes constructed there. The County will encourage and assist developers to utilize any and all available design techniques and funding sources, including but not limited to the maximization of density, logical and efficient subdivision of the parcels that make up this district, predevelopment review and permit streamlining, and utilization of federal, state, and local programs and funding sources such as CDBG, HOME, tax credits, fee deferrals, etc.</p>	<p>The Environmental Impact Report was not completed. No development activity occurred due to infrastructure constraints.</p>	<p>Due to the infrastructure constraints associated with the Salida Community Plan, the County should eliminate this program with consideration for new HCD site selection criteria. Findings from the future sites inventory analysis will inform new prospective sites to make up for the shortfall from the Salida Community Plan.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 1-10 Affordable Rental Housing: Continue to support countywide efforts to increase the access to and the inventory of affordable rental housing for low-income households. Collaborate with other local jurisdictions on affordable rental housing development, when feasible.</p>	<p>The County partnered with the HACS to construct six affordably restricted units on three vacant properties the County acquired through the NSP funds. Two NSP homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. The County contributed NSP funding for the construction of 56 multi-family affordable housing units in the City of Oakdale and PLHA funds to the SRHA for the development of 15 permanent supportive housing units for households with very-low incomes in the City of Modesto. The County approved three Staff Approval Permits for the development of farmworker housing, consisting of three single family homes and construction of a 5,055 square foot commissary with five living units for farmworker housing. In addition, an average of 32 individuals per year were served with rapid re-housing services and 50 individuals per year with homeless prevention services throughout the Urban County member jurisdictions. .</p>	<p>Program 1-10 has been carried over into Program 2-1 – Affordable Housing Development Assistance and Program 2-3 – Housing Choice Vouchers in the 6th Cycle Housing Element.</p>
<p>Program 1-11 Analysis of Impediments to Fair Housing: Continue to implement the actions identified in response to impediments to fair housing identified in the County's Analysis of Impediments to Fair Housing completed in 2015.</p>	<p>An updated 2020-2025 Regional Analysis of Impediments to Fair Housing Choice was adopted on May 12, 2020 by the Board of Supervisors. It identified four findings of fair housing challenge: (1) Affordability and Costs, including high cost of housing, lack of affordable housing, application fee, deposits and up-front costs; (2) Income, including Low wages, people on fixed-incomes, and Section 8 Vouchers; (3) Price-setting, profit-driven sensibility of landlords; and (4) Supply and Demand, short supply of affordable housing and limits on new housing developments. The Stanislaus Urban County was awarded CDBG and ESG funds, which provided subsidies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.</p>	<p>Program 1-11 Has been carried over into Program 5-1 – Affirmatively Furthering Fair Housing & Environmental Justice in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 2-1 Residential Accessibility: Continue to promote accessibility for the disabled by reviewing multi-family housing plans for compliance with state and federal regulations and by considering requests for reasonable accommodations.</p>	<p>The Zoning Ordinance was updated in 2016 to incorporate a reasonable accommodations ordinance. No multi-family housing plans or requests for reasonable accommodation were received.</p>	<p>Program 2-1 has been carried over into Program 4-1 – Housing for Special Needs Populations in the 6th Cycle Housing Element.</p>
<p>Program 2-2 Fair Housing: Continue to maintain fair housing services, contracted through the CDBG program, to respond to issues arising out of housing complaints, disseminate the County’s fair housing policies, and to provide fair housing education to renters, housing providers, and public agencies and nonprofits. Continue to enforce the federal and state laws that prohibit discrimination in housing. They are the federal Fair Housing Amendment Act of 1988; Title VIII of the 1968 Civil Rights Act; California Fair Employment and Housing Act (Government Code Section 12955); and Unruh Act (California Civil Code Section 50).</p>	<p>As the Urban County lead, the County contracted with Project Sentinel for fair housing services who assisted with an average of 399 fair housing and tenant/landlord referrals, 12 housing cases, and 32 tenant/landlord cases per year for all Urban County member jurisdictions which includes unincorporated Stanislaus County and the cities of Ceres, Hughson, Oakdale, Newman, Patterson, Riverbank, and Waterford.</p>	<p>Program 2-2 has been carried over into Program 5-2 – Fair Housing Services in the 6th Cycle Housing Element.</p>
<p>Program 2-3 Funding and Technical Assistance for Special Needs Housing: Continue to seek and use all available funding programs and other types of housing assistance in an effort to accommodate the housing needs unique to special needs groups, including those with physical and developmental disabilities, seniors, families with female heads of household, large families, farmworkers, homeless, and other residents with special needs.</p>	<p>Staff provided technical assistance by responding to inquiries and by providing educational and support materials in person and electronically. Through the ESG assistance program they assisted clients with special needs.</p>	<p>Program 2-3 has been carried over into Program 5-2 – Fair Housing Services in the 6th Cycle Housing Element. .</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 2-4 Information and Referral: Continue to provide housing information and referral services to low-income, senior, disabled, homeless, and other special needs populations on an as-needed basis. Individuals seeking housing advice, counseling, and other types of assistance will be referred to public agencies, community-based organizations, and other service providers of the requested service or assistance.</p>	<p>The County provided housing information and referral services to the public. The County’s website also identifies housing resource agencies.</p>	<p>Program 2-4 has been carried over into Program 5-2 – Fair Housing Services and Program 5-3 – Displacement Services in the 6th Cycle Housing Element.</p>
<p>Program 2-5 Farmworker Housing in Agricultural and other zones: Continue to allow farm-employee housing in agricultural zones as well as in any other zones that permit agricultural uses. Housing for year-round, full-time farm employees is permissible in addition to the number of dwellings normally allowed by the density standard. Per Health and Safety (H&S) Code Section 17021.6, no use permit, zoning variance, or other zoning clearance will be required of this employee housing that is not required of any other agricultural activity in the same zone. In addition, in accordance with H&S Code Section 17021.5, any employee housing providing accommodations for six or fewer employees is deemed a single-family structure with a residential land use designation and cannot be defined as a boardinghouse, rooming house, hotel, dormitory, or other similar term that implies that the employee housing is a business run for profit or differs in any other way from a family dwelling. Per H&S Code Section 17021.6, the County will review its Zoning Ordinance and amend it as needed to treat employee housing consisting of no more than 12 units or 36 beds as an agricultural use and permitted in the same manner as other agricultural uses in the same zone in zones where agricultural uses are permitted.</p>	<p>Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single-family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. A farmworker housing ordinance was drafted; however, state laws regarding the permitting of farmworker housing continue to be allowed in the interim period before the farmworker housing ordinance is adopted.</p>	<p>Program 2-5 has been carried over into Program 4-2 – Farmworker Housing in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 2-6 State and Federal Housing Programs for Farmworkers: Continue to assist the Housing Authority of the County of Stanislaus in its administration of State and Federal housing programs for farmworker housing, and support their funding applications for farmworker housing, such as HCD's Joe Serna Grant. The County will outreach to developers and the agriculture industry to identify any constraints and solutions to the development of farmworker housing and to identify partnership opportunities.</p>	<p>Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single-family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. A farmworker housing ordinance was drafted; however, State laws regarding the permitting of farmworker housing continue to be allowed in the interim period before the farmworker housing ordinance is adopted.</p>	<p>Program 2-6 has been carried over into Program 4-2 – Farmworker Housing in the 6th Cycle Housing Element.</p>
<p>Program 2-7 Second Units: Continue to provide additional affordable housing opportunities by allowing the construction of second units in single-family residential areas, subject to the issuance of a building permit. Also consider reduced development fees for second units up to a certain square footage to help maintain their affordability. The County will also provide information and outreach regarding the option to build second units. Information will be made available at the public counter and on the County's website. As infrastructure is improved landowners will be made aware of the ability to connect including the construction of second units (see also Program 4-7).</p>	<p>The County permitted a total of 58 second units throughout the 5th cycle. The County permitted 98 ADUs between 2018 and 2022 in accordance with state law. In 2021 the County adopted their ADU ordinance to comply with current state regulations.</p>	<p>Program 2-7 has been carried over into Program 3-8 – Accessory Dwelling Units in the 6th Cycle Housing Element.</p>
<p>Program 2-8 Universal Design: Encourage development to include universal design elements that address limited lifting or flexibility, limited mobility, and limited vision.</p>	<p>No development request with universal design was received.</p>	<p>Program 2-8 has been carried over into Program 4-1 – Housing for Special Needs Populations in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 2-9 Overcrowding: Promote the construction of and seek financial sources for affordable single-family and multiple family units with 3-4 bedrooms to alleviate overcrowding, including room additions, within the County's housing rehabilitation programs.</p>	<p>In December 2020, a 56-unit multi-family development was completed in the City of Oakdale which was partially funded by the County NSP program. 98 ADUs were permitted throughout the 5th cycle.</p>	<p>Program 2-9 has been carried over into Program 2-1 – Affordable Housing Development Assistance in the 6th Cycle Housing Element.</p>
<p>Program 2-10 Residential Care Homes: Amend the Zoning Ordinance to allow residential care homes (group homes) by right in residential zones for small group homes (six persons or fewer) and with a use permit for large facilities (seven persons or more) consistent with state law.</p>	<p>The County determined that the Zoning Ordinance is in compliance with the State law.</p>	<p>Program 2-10 has not carried over to the 6th Cycle Housing Element, as the objective of this program has been accomplished.</p>
<p>Program 3-1 Housing Programs: Through the CDBG Program and the HOME Consortium, the County will continue to support funding allocations to be used for a variety of housing programs that include rehabilitation, construction, land acquisition, infrastructure improvements, and purchase assistance.</p>	<p>The Housing Rehabilitation program provided funds for the repair of 14 single family units, The ESG homeless prevention program also provided funds to place individuals experiencing homelessness into housing. In 2020, the SRHA completed the construction of three single family homes and converted two NSP properties into affordable rental housing units.</p>	<p>Program 3-1 has been carried over into Program 1-1 – Home Rehabilitation Program and Program 2-1 – Affordable Housing Development Assistance in the 6th Cycle Housing Element.</p>
<p>Program 3-2 Home Rehabilitation Program: Continue to assist income-eligible households, including affordable housing rental units, with housing rehabilitation needs. The program is designed to respond to housing needs such as leaking roofs, fire damage, accessibility retrofits, and other health and safety related housing needs. The County will consider proactive approaches to housing rehabilitation, including developing criteria to identify households and neighborhoods of highest need, such as lower income renter households.</p>	<p>The Housing Rehabilitation Program is implemented by the HACS using CDBG and HOME funding; 15 households were assisted with rehab throughout the planning period of which 7 were low- and very low-income households.</p>	<p>Program 3-2 has been carried over into Program 1-1 – Home Rehabilitation Program in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 3-3 Municipal Utilities: Continue to construct or rehabilitate municipal utility services (e.g., water, sewer, storm drain) in disadvantaged unincorporated communities identified as needing services, in cooperation with incorporated cities. Priority projects during the time frame of this Housing Element include the Empire storm drain and sidewalk project and the Airport Neighborhood sewer project, which have been partially completed. The Stanislaus County Board of Supervisors (BOS) adopted (8/8/2011) Residential Neighborhood Infrastructure Project Ranking Criteria to be used in determining the priority of future infrastructure spending projects.</p>	<p>The Parklawn Neighborhood Sewer Project and Airport Neighborhood Sewer projects were completed during the planning period. The first phase of the West Modesto Sewer Infrastructure Project was also completed. 160 sewer connections were issued building permits, including: 123 in the Airport Neighborhood, 27 in the Parklawn Neighborhood, 9 in the Robertson Road Neighborhood, and one in the Spencer/Marshall Neighborhood.</p>	<p>Program 3-3 has been carried over into Program 3-9 – Infrastructure in the 6th Cycle Housing Element.</p>
<p>Program 3-4 Maintenance of Assisted Units: Seek to maintain any federally, state, or locally assisted multifamily rental housing through the development of programs in coordination with other public and private nonprofit housing agencies. No deed-restricted affordable units are currently located in the unincorporated areas of the County; therefore, there are no “at-risk” units at this time. Should the County have any affordable units prior to the end of the planning period; the County will contact all state and federal agencies that might provide affordable housing funds to determine whether any funding is available for preservation of the at-risk assisted units. The County will work with not-for-profit housing providers to apply for affordable housing subsidies that may be available for this use, if necessary, in the future.</p>	<p>NSP funded projects completed construction of eight affordable housing units in unincorporated Stanislaus County throughout the 5th cycle.</p>	<p>Program 3-4 has been carried over into Program 1-4 – Preservation of At-Risk Affordable Housing in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 4-1 General Plan Review: Review the General Plan, community plans, and zoning on an annual basis in a continuing effort to ensure that an adequate supply of land is available to meet local and regional housing goals for all types of housing.</p>	<p>The General Plan was updated and adopted in 2016. From 2017-2020 there was an adequate supply of land to meet regional housing goals.</p>	<p>Program 4-1 has been carried over into Program 3-1- Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.</p>
<p>Program 4-2 Vacant and Underutilized Site Development: Streamline the approval process as needed in order to encourage the development of vacant and underutilized sites. In addition, the County will create and maintain an inventory of potential residential infill sites, both vacant and underutilized. This information will be available to the public through the Planning and Community Development Department. The County will prioritize development of these small lots by informing developers and potential applicants about options for developing small lots. The County will also review its zoning standards during the planning period to identify any constraints to small lot development and, if identified, develop recommended revisions to development standards to facilitate small lot development</p>	<p>Vacant site data is provided online as parcel level data. Planning staff have also provided interested property owners and developers with information. The County partnered with the HACS to construct six affordably restricted units on three vacant properties the County acquired through the NSP funds. Two NSP homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. Additionally, ADU permits in infill development were issued, and certificate of occupancies were issued for other infill developments.</p>	<p>Program 4-2 has been carried over into Program 3-1- Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.</p>
<p>Program 4-3 Infill Development: Continue to participate with affordable housing developers and partner with other jurisdictions on infill projects that develop new affordable housing in areas with existing public facilities and services.</p>	<p>During the 5th cycle, the County partnered with the HACS to construct six affordably restricted units on three vacant properties the County acquired through the NSP funds. Two NSP homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. The County contributed NSP funding for the construction of 56 multi-family affordable housing units in the City of Oakdale and PLHA funds to the SRHA for the development of 15 permanent supportive housing units for households with very-low incomes in the City of Modesto all of which were affordable infill development. ADUs located on infill developments were also permitted.</p>	<p>Program 4-3 has been carried over into Program 3-1- Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 4-4 Minimum Residential Densities: Establish minimum residential densities in all residential zoning districts to encourage the construction of a broad range of densities in order to promote a variety of housing types. The High Density Residential district currently has a density range between 0 and 25 units per acre. VI-107A minimum density could be established at 16 units per acre, for example, to ensure that land in this district will be developed at its intended higher-density range. The establishment of the minimum densities shall correspond to Land Use Element density requirements by requiring that development be designed to maximize allowable densities unless it can be shown that site design constraints make development at the highest allowable density infeasible.</p>	<p>Minimum residential densities were not established during the 5th Cycle Housing Element.</p>	<p>Program 4-4 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.</p>
<p>Program 4-5 Mixed-Use Development: There may be opportunities in established central business districts to reorient business-only structures to contain both residential and nonresidential uses. This program will identify such potential properties and encourage proprietors to consider mixed use.</p>	<p>No mixed-use development projects were proposed in 2015-2020. The County will evaluate opportunities for rezoning and mixed-use development as a potential method for increasing affordable housing.</p>	<p>Program 4-5 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 4-6 Extremely Low-Income Housing: This program will seek to encourage, expand, and assist the types of housing that meet the needs of extremely low-income households and individuals, such as supportive housing, rental assistance programs, multi-family housing, and single-room occupancy (SRO) units, as well as supportive programs. The County will amend the Zoning Ordinance to permit and define SRO units in at least one zone with or without discretionary review. Funding assistance and/or financial incentives and concessions will be added and/or revised to include extremely low-income households as appropriate. ESG funds will continue to be utilized to provide rental assistance to extremely low-income households at risk of becoming homeless. Staff will outreach to developers to identify potential affordable housing opportunities for existing or new extremely low-income units on an annual basis.</p>	<p>During the 5th Cycle Housing Element, 70 homeless individuals were placed into rental housing and connected with services such as Temporary Assistance for Needy Families (TANF), Food Stamps, Veteran’s Benefits, and employment opportunities. ESG funds were used to provide emergency and transitional shelters. ESG funds and programs assisted hundreds of housing insecure individuals with emergency shelter services.</p>	<p>Program 4-6 has been carried over into Program 2-1 – Affordable Housing Development Assistance and Program 4-3 – Homelessness in the 6th Cycle Housing Element.</p>
<p>Program 4-7 Areas with New Infrastructure Capacity: Continue to encourage the construction of housing, including affordable housing, in lower income unincorporated areas with newly completed infrastructure improvements (i.e., water and sewer). Property owners in these areas will be notified of any increased development potential (including but not limited to second units), and incentives such as fee deferrals and permit streamlining will be offered.</p>	<p>The Parklawn Neighborhood Sewer Project and Airport Neighborhood Sewer projects were completed during the planning period. The first phase of the West Modesto Sewer Infrastructure Project was also completed. 160 sewer connections were issued building permits, including: 123 in the Airport Neighborhood, 27 in the Parklawn Neighborhood, 9 in the Robertson Road Neighborhood, and one in the Spencer/Marshall Neighborhood.</p>	<p>Program 4-7 has been carried over into Program 3-9 – Infrastructure in the 6th Cycle Housing Element.</p>

Housing Program	Program Progress	Continued Appropriateness
<p>Program 4-8 Emergency Shelter Capacity Monitoring: The Zoning Ordinance allows development of emergency shelters without discretionary review in the H-1 and C-2 zones outside of spheres of influence with a limit of 10 beds per zone, for a total of 20 beds between the two zones which may be a constraint on the development of emergency shelters. To address the potential constraint, the Ordinance will be reviewed and amended as appropriate to ensure zoning encourages the development of emergency shelters.</p>	<p>A Zoning Ordinance update addressing compliance with SB 2 and the by-right approval of emergency shelters was adopted in 2016. No emergency shelter providers have approached the planning department to request added capacity or the construction of a new emergency shelter.</p>	<p>Program 4-8 has been carried over into Program 4-3 – Homelessness in the 6th Cycle Housing Element.</p>
<p>Program 5-1 Regulations and Fees: Review existing fees, standards, ordinances, and procedures on an annual basis in a continuing effort to identify barriers to affordable housing and determine methods for reducing housing costs. This will include reviewing the level of public facilities fees charged to ensure they are consistent with the cost of providing public services and facilities and do not contribute unnecessarily to increasing housing costs.</p>	<p>Planning fees were updated in 2022. In 2019 and 2020, the Board of Supervisors adopted updates to the Public Facility Fees to amend fees based on current County projects and to incorporate reduced or waived fees for Accessory Dwelling Units. Public facility fee deferrals continued to be offered as an option for low-income housing developments through the planning period. The County’s PFF Committee approved two PFF waivers for affordable housing developments, one in the City of Modesto which includes 12 senior housing units available to low and very low-income households, and the other was in the City of Turlock which will be providing 22 units for low- and very low-income households.</p>	<p>Program 5-1 has been carried over into Program 2-1 – Affordable Housing Development Assistance in the 6th Cycle Housing Element.</p>
<p>Program 5-2 Planned Development: Continue to encourage use of Planned Development (P-D) zones in lieu of standard residential zoning. P-D allows higher housing densities and greater flexibility in design, making it possible to develop a broader spectrum of housing choice for residents.</p>	<p>In 2018 one P-D rezoning application was approved for 22 units to be used as emergency shelter housing and four tentative maps were approved which included rezoning to Planned Development to allow for flexible design standards.</p>	<p>Program 5-2 has not been carried over into the 6th Cycle Housing Element, as it is an existing function of the Planning Department.</p>
<p>Program 5-3 One-stop Permits: Continue the efficiencies of one-stop shop building permit review process.</p>	<p>Streamlined review of building permits was ongoing during the 5th Cycle Housing Element</p>	<p>Program 5-3 has been carried over into Program 3-7 – Expedited Project Review in the 6th Cycle Housing Element.</p>

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Housing Program	Program Progress	Continued Appropriateness
<p>Program 5-4 Building Code Review: Review and amend ordinances to reflect changes in mandated laws and emergency federal, state, and local trends.</p>	<p>Updated Title 24 and included adoption of HCD’s Appendix Q for tiny homes. An ADU ordinance was adopted in 2020.</p>	<p>Program 5-4 has been carried over into Program 1-2 – Residential Compliance Program in the 6th Cycle Housing Element.</p>
<p>Program 5-5 Duplexes: Continue to allow the development of duplexes on corner lots in single-family residential zones.</p>	<p>During the 5th Cycle Housing Element, one duplex was constructed and one tentative map and rezone was approved for development of five duplexes on three parcels.</p>	<p>Program 5-5 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.</p>
<p>Program 5-6 Mobile Homes: Continue to allow mobile homes or manufactured housing in lieu of single-family residences. In order to fully implement State law, the Zoning Ordinance will be amended to allow mobile homes in the Historical Site (HS) zoning district, subject to allowable aesthetic and architectural requirements as those required for conventional dwellings. To encourage the development of mobile homes, information about options for mobile home development will continue to be provided over the phone and at the public counter.</p>	<p>Throughout the 5th cycle, as with prior cycles, mobile homes were permitted in lieu of single-family residences. A total of 108 mobile homes were permitted as single-family homes, farmworker housing, or as ADUs throughout the 5th cycle.</p>	<p>Program 5-6 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.</p>
<p>Program 5-7 Measure E Review and Encouraging Development on Non-measure E Parcels: Periodically review Measure E to see if the ability for Stanislaus County to meet its housing supply needs is constrained. If Measure E is found to be constraining the County's ability to meet its housing need, then establish incentives for non-Measure E parcels to develop, including coordinating with other local agencies to identify opportunities for affordable housing within incorporated communities. Examples of incentives that could be considered include fee deferrals, expedited permit processing, and modification of development standards in areas targeted for growth.</p>	<p>The County continues to evaluate Measure E to consider its impacts on housing development.</p>	<p>Program 5-7 has been carried over into Program 3-1 – Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.</p>

Appendix C

Sites Inventory

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
STANISLAUS COUNTY	517 LEON AVE	95351	037-039-035-000		Medium Density Residential	R-2	0	14	0.83	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	6	0	6	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	COLORADO AVE	95351	037-039-039-000		Medium Density Residential	R-2	0	14	0.6	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	6	0	6	Current Use: Vacant	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	528 ROSELAWN AVE	95351	037-040-012-000		Medium Density Residential	R-2	0	14	0.91	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	7	0	7	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	1005 ROUSE AVE	95351	037-040-017-000		Medium Density Residential	R-2	0	14	1.03	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	5	0	5	Current Use: Multi-Family w/ Extra Land	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	COLORADO AVE	95351	037-040-021-000		Medium Density Residential	R-2	0	14	0.2	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	2	0	2	Current Use: Vacant	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	507 COLORADO AVE	95351	037-040-028-000		Medium Density Residential	R-2	0	14	0.74	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	5	0	5	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	0 COLORADO AVE	95351	037-040-056-000		Medium Density Residential	R-2	0	14	0.91	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	9	0	9	Current Use: Vacant	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	525 COLORADO AVE	95351	037-040-057-000		Medium Density Residential	R-2	0	14	0.91	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	9	0	9	Current Use: Vacant	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	532 SUNSET AVE	95351	037-041-014-000		Medium Density Residential	R-1	0	8.7	0.91	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	0	3	3	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	519 ROSELAWN AVE	95351	037-041-035-000		Medium Density Residential	R-1	0	8.7	0.92	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	0	3	3	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	ROSELAWN AVE	95351	037-041-036-000		Medium Density Residential	R-1	0	8.7	3.12	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	0	20	20	Current Use: Vacant	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	812 COLORADO AVE	95351	037-032-011-000		Low Density Residential	R-A	0	5.4	0.92	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	0	3	3	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0.56
STANISLAUS COUNTY	718 COLORADO AVE	95351	037-031-011-000		Low Density Residential	R-A	0	5.4	4.85	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	0	19	19	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0.6
STANISLAUS COUNTY	1406 SOUTH AVE	95351	037-030-002-000		Low Density Residential	R-1	0	8.7	0.89	Residential	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	0	5	5	Current Use: Single Family W/Extra Land	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	7111 MC HENRY AVE	95356	004-102-005-000		Planned Development	P-D	0	1	81.9	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Elen	0	0	65	65	Current Use: Vacant	Improvement to Land Value Ratio: 0

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Infrastructure	Optional Information1
STANISLAUS COUNTY	TUCSON AVE	95350	056-032-069-000	41	28	0	0	0 Shortfall of Sites	4.32	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	69	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	TUCSON AVE	95350	056-033-049-000	67	46	0	0	0 Shortfall of Sites	7.12	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	113	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	LASSEN & MARIN AVE	95350	056-034-001-000	48	33	0	0	0 Shortfall of Sites	5.1	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	81	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	LASSEN & INYO AVE	95350	056-035-001-000	52	36	0	0	0 Shortfall of Sites	5.55	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	88	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	YUMA & TUCSON AVE	95350	056-036-036-000	22	14	0	0	0 Shortfall of Sites	2.28	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	36	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	3833 LESTER RD	95316	024-012-004-000	36	25	0	0	0 Shortfall of Sites	4.52	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	61	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	3817 LESTER RD	95316	024-012-005-000	36	24	0	0	0 Shortfall of Sites	4.94	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	60	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	3325 KERN ST	95316	024-033-002-000	14	9	0	0	0 Shortfall of Sites	1.84	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	23	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	4165 MAIN ST	95316	024-033-026-000	8	5	0	0	0 Shortfall of Sites	1.11	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	13	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	3252 STORY RD	95316	024-053-041-000	34	23	0	0	0 Shortfall of Sites	3.62	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	57	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	3225 STORY RD	95316	024-025-004-000	13	8	0	0	0 Shortfall of Sites	1.8	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	21	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0.94
STANISLAUS COUNTY	124 S ABBIE ST	95357	133-017-002-000	0	0	0	10	0 Shortfall of Sites	0.96	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	114 S ABBIE ST	95357	133-017-003-000	0	0	10	0	0 Shortfall of Sites	0.93	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	100 S ABBIE ST	95357	133-017-004-000	0	0	10	0	0 Shortfall of Sites	0.96	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Multi-family w/ Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	32 S ABBIE ST	95357	133-017-005-000	0	0	10	0	0 Shortfall of Sites	0.96	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Multi-family w/ Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	18 S ABBIE ST	95357	133-017-006-000	0	0	15	0	0 Shortfall of Sites	0.96	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	15	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	4701 NORMA WAY	95328	045-021-019-000	0	0	11	0	0 Shortfall of Sites	1	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	11	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	4701 MAUD AVE	95328	045-021-020-000	17	11	0	0	0 Shortfall of Sites	2	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	28	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	0 9TH ST	95328	045-033-007-000	14	9	0	0	0 Shortfall of Sites	1.45	Commercial	H-1	Medium High Density Residential R-3		16	25	23	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	822 BYSTRUM RD	95350	038-017-041-000	42	28	0	0	0 Shortfall of Sites	4.4	Commercial	P-D	Medium High Density Residential R-3		16	25	70	Non-Vacant	Mobilehome Parks	YES - Current	Improvement to Land Value Ratio: 0.3
STANISLAUS COUNTY	854 PECOS AVE	95350	038-039-016-000	12	7	0	0	0 Shortfall of Sites	1.19	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	19	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0.86
STANISLAUS COUNTY	838 PECOS AVE	95351	038-039-031-000	0	0	8	0	0 Shortfall of Sites	0.87	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	8	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	1809 E HATCH RD	95351	039-025-019-000	11	6	0	0	0 Shortfall of Sites	1.51	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	17	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	4730 SALIDA BLVD	95368	135-041-004-000	17	11	0	0	0 Shortfall of Sites	1.75	Commercial	C-2	Medium High Density Residential R-3		16	25	28	Non-Vacant	Hotels & Motels W/Res	YES - Current	Improvement to Land Value Ratio: 0.53
STANISLAUS COUNTY	HOPE LN	95368	135-041-010-000	0	0	5	0	0 Shortfall of Sites	0.32	Commercial	C-2	Medium High Density Residential R-3		16	25	5	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	4573 HOPE LN	95368	135-041-011-000	0	0	4	0	0 Shortfall of Sites	0.62	Commercial	C-2	Medium High Density Residential R-3		16	25	4	Non-Vacant	Single Family W/Extra Land	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	4549 HOPE LN	95368	135-041-012-000	0	0	7	0	0 Shortfall of Sites	0.46	Commercial	C-2	Medium High Density Residential R-3		16	25	7	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	3703 COLLINS RD	95307	053-031-023-000	39	27	0	0	0 Shortfall of Sites	4.18	Planned Development	P-D	Medium High Density Residential R-3		16	25	66	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	127 SPENCER AVE	95351	030-004-004-000	11	6	0	0	0 Shortfall of Sites	1.12	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	17	Vacant	Vacant	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	207 SPENCER AVE	95351	030-004-005-000	13	9	0	0	0 Shortfall of Sites	1.66	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	22	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	227 SPENCER AVE	95351	030-004-009-000	9	5	0	0	0 Shortfall of Sites	1.35	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	14	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	301 SPENCER AVE	95351	030-004-010-000	0	0	10	0	0 Shortfall of Sites	0.96	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Multi-Family w/ Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	323 SPENCER AVE	95351	030-004-013-000	0	0	10	0	0 Shortfall of Sites	0.87	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	333 SPENCER AVE	95351	030-004-014-000	0	0	10	0	0 Shortfall of Sites	0.84	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	337 SPENCER AVE	95351	030-004-015-000	0	0	10	0	0 Shortfall of Sites	0.82	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	10	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	523 MAZE BLVD	95351	030-005-001-000	11	6	0	0	0 Shortfall of Sites	1.31	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	17	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	531 MAZE BLVD	95351	030-005-003-000	11	6	0	0	0 Shortfall of Sites	1.45	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	17	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	539 MAZE BLVD	95351	030-005-004-000	11	6	0	0	0 Shortfall of Sites	1.44	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	17	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	128 SPENCER AVE	95351	030-005-011-000	0	0	10	0	0 Shortfall of Sites	0.9	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	10	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	204 SPENCER AVE	95351	030-005-012-000	0	0	10	0	0 Shortfall of Sites	0.88	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	10	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	226 SPENCER AVE	95351	030-005-015-000	0	0	12	0	0 Shortfall of Sites	0.94	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	12	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	310 SPENCER AVE	95358	030-005-016-000	31	21	0	0	0 Shortfall of Sites	3.54	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	52	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	320 SPENCER AVE	95351	030-005-018-000	10	6	0	0	0 Shortfall of Sites	1.24	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	16	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	533 TRUMAN AVE	95351	030-005-026-000	15	9	0	0	0 Shortfall of Sites	2.01	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	24	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	415 SPENCER AVE	95351	030-008-003-000	13	8	0	0	0 Shortfall of Sites	1.51	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	21	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	503 SPENCER AVE	95351	030-008-005-000	0	0	8	0	0 Shortfall of Sites	0.97	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	8	Non-Vacant	Multi-family w/ Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	511 SPENCER AVE	95351	030-008-006-000	0	0	9	0	0 Shortfall of Sites	0.98	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	9	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	405 SPENCER AVE	95351	030-008-016-000	10	6	0	0	0 Shortfall of Sites	1.2	Low Density Residential	R-A	Medium High Density Residential R-3		16	25	16	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	1427 RITSCH LN	95351	037-004-061-000	0	0	5	0	0 Shortfall of Sites	0.5	Low Density Residential	R-1	Medium High Density Residential R-3		16	25	5	Non-Vacant	Single Family W/Extra Land	YES - Planned	Improvement to Land Value Ratio: 0
STANISLAUS COUNTY	1511 CROWS LANDING RD	95351	056-011-028-000	0	0	12	0	0 Shortfall of Sites	0.77	Commercial	C-2	Commercial	MU	16	25	12	Non-Vacant	Commercial	YES - Current	Improvement to Land Value Ratio: 0.59
STANISLAUS COUNTY	1627 CROWS LANDING RD	95351	056-017-021-000	19	13	0	0	0 Shortfall of Sites	2.03	Commercial	C-2	Commercial	MU	16	25	32	Non-Vacant	Commercial	YES - Current	Improvement to Land Value Ratio: 0.74
STANISLAUS COUNTY	1715 CROWS LANDING RD	95358	056-018-002-000	0	0	14	0	0 Shortfall of Sites	0.93	Commercial	C-2	Commercial	MU	16	25	14	Non-Vacant	Commercial	YES - Current	Improvement to Land Value Ratio: 0.84
STANISLAUS COUNTY	1943 CROWS LANDING RD	95358	056-048-052-000	0	0	12	0	0 Shortfall of Sites	0.75	Commercial	C-2	Commercial	MU	16	25	12	Non-Vacant	Commercial	YES - Current	Improvement to Land Value Ratio: 0.29
STANISLAUS COUNTY	1540 CROWS LANDING RD	95351	086-010-034-000	0	0	13	0	0 Shortfall of Sites	0.82	Commercial	C-2	Commercial	MU	16	25	13	Vacant	Vacant	YES - Current	Improvement to Land Value Ratio: 0

Table C: Land Use

Zoning Designation From Table A, Column G and Table B, Columns L and N (e.g., "R-1")	General Land Uses Allowed (e.g., "Low-density residential")
H-1	Highway frontage type commercial and medium / high density multifamily residential
P-D	Planned residential development including medium / high density multifamily residential
R-1	Low density residential
R-2	Medium density residential
R-3	Medium / high density residential
R-A	Very-low density residential
S-P	Specific plans including single family residential
MU	Commercial/residential mixed use at medium / high density
C-2	General commercial uses