

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

DEPT: Planning and Community Development

BOARD AGENDA:5.2
AGENDA DATE: May 12, 2020

SUBJECT:

Approval to Close a 30-Day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2020-2025 Stanislaus Urban County Consolidated Plan; the Fiscal Year 2020-2021 Annual Action Plan; the Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice; and the Filing of a Notice of Exemption

BOARD ACTION AS FOLLOWS:

RESOLUTION NO. 2020-0216

On motion of Supervisor Withrow , Seconded by Supervisor DeMartini
and approved by the following vote,
Ayes: Supervisors: Chiesa, Withrow, Berryhill, DeMartini and Chairwoman Olsen
Noes: Supervisors: None
Excused or Absent: Supervisors: None
Abstaining: Supervisor: None

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

MOTION:

ATTEST: Elizabeth A. King
ELIZABETH A. KING, Clerk of the Board of Supervisors

File No.

THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
AGENDA ITEM

DEPT: Planning and Community Development

BOARD AGENDA:5.2
AGENDA DATE: May 12, 2020

CONSENT ☐

CEO CONCURRENCE:

4/5 Vote Required: No

SUBJECT:

Approval to Close a 30-Day Public Comment Period, and Conduct a Public Hearing to Consider Approval of the Fiscal Year 2020-2025 Stanislaus Urban County Consolidated Plan; the Fiscal Year 2020-2021 Annual Action Plan; the Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice; and the Filing of a Notice of Exemption

STAFF RECOMMENDATION:

1. Close the 30-day public comment period and conduct a public hearing.
2. Approve the filing of a Notice of Exemption finding that the proposed approvals are Exempt under provisions of the California Environmental Quality Act (CEQA) pursuant to State Guidelines.
3. Approval of the Fiscal Year 2020-2025 Stanislaus Urban County Consolidated Plan (Con Plan); the Fiscal Year 2020-2021 Annual Action Plan (AAP); and the Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice (AI)
4. Authorize the Director of Planning and Community Development to sign and submit to the Federal Housing and Urban Development (HUD) the Applications for Federal Assistance (SF-424 and SF-424D), and Community Development Block Grant (CDBG) and Emergency Solutions Grants (ESG) Program certifications.
5. Authorize the County Chief Executive Officer to sign the Fiscal Year 2020-2021 Subrecipient Agreements with each Stanislaus Urban County member.
6. Authorize the County Chief Executive Officer to sign the Fiscal Year 2020-2021 City of Turlock/Stanislaus County HOME Investment Partnerships (HOME) Consortium Subrecipient Agreement.
7. Authorize the Director of Planning and Community Development to execute any related program agreements, contracts, or other documentation required for implementation of CDBG, ESG, HOME Investment Partnerships Program (HOME), Neighborhood Stabilization Programs (NSP), and any other programs

identified in the Annual Action Plan. This authorization includes the use of any program income in accordance with applicable program guidelines.

8. Authorize the Planning and Community Development Department to incorporate any comments received prior to the close of the public comment period and during the public hearing in the final documents and to make alterations to the documents as directed by HUD, provided alterations are technical in nature and do not alter the approved programs or funding allocations.

DISCUSSION:

This is a request to close the 30-day public comment period, and conduct a Public Hearing to consider approval of the Fiscal Year 2020-2025 Stanislaus Urban County Consolidated Plan (Con Plan), Fiscal Year 2020-2021 Annual Action Plan (AAP); and the Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice (AI).

Stanislaus County, in partnership with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank and Waterford form the Stanislaus Urban County for purposes of receiving Federal Housing and Urban Development (HUD) Community Development Block Grant Program (CDBG) and Emergency Solutions Grants (ESG) Program funding. Stanislaus County is the “lead entity” with responsibility for implementing and administering CDBG and ESG funding. The City of Riverbank is joining the Stanislaus Urban County for the first time in Fiscal Year 2020-2021.

The draft Con Plan has been prepared in partnership with the City Turlock as a Consortium Con Plan. The City of Turlock and the Stanislaus Urban County together form the City of Turlock/Stanislaus County HOME Investments Partnerships Program (HOME) Consortium for the purpose of receiving HUD HOME funding. The City of Turlock is also a HUD entitlement jurisdiction receiving HUD CDBG funding.

In accordance with Federal regulations, the County’s Citizen Participation Plan for HUD funding requires a minimum 30-day public review period prior to Board of Supervisors consideration to approve the Con Plan, AAP, and AI. The draft documents were made available to the public on April 10, 2020 and notice of the public hearing, along with notice of the document availability, was published in The Modesto Bee on April 10, 2020, and the documents have been made available online at: <http://www.stancounty.com/planning/>

Since release of the documents for public review, minor changes that include grammatical edits, formatting, and information regarding community feedback have been added to the final draft Con Plan, AAP, and AI being considered for approval. In addition, Coronavirus Aid, Relief, and Economic Security (CARES) Act funding information and an Empire Sidewalk project have been added to the Con Plan and the AAP. A discussion on the CARES funding and Empire project are provided later in this report. All edits are reflected in tracked changes, as applicable, in the attached Con Plan, AAP, and AI documents.

The Fiscal Year 2020-2025 Con Plan outlines the goals for utilizing CDBG, HOME, and ESG HUD entitlement funds to assist low income households and persons in the areas of housing, public infrastructure, public services and homeless assistance and prevention for the next five years for the Stanislaus Urban County. The AAP outlines the programs and projects to be funded during Fiscal Year 2020-2021 with CDBG, HOME and ESG funds throughout the Stanislaus Urban County.

The AI is a County-wide analysis of impediments to fair housing and an assessment of local government's laws, ordinances, statutes, and administrative policies as well as local conditions that affect the location, availability, and accessibility of housing.

The AI includes the entire Stanislaus Urban County along with the cities of Modesto and Turlock. The AI has been prepared in partnership with the Stanislaus Urban County, the cities of Modesto and Turlock, and the Stanislaus Regional Housing Authority.

Although the consolidated planning process and creation of the Con Plan, AAP, and AI has been conducted in partnership, it is important to note that all the partners will independently approve the documents. However, as a HOME Consortium, the Stanislaus Urban County is dependent on the City of Turlock's submittal of the Con Plan to HUD before the Stanislaus Urban County can submit its AAP.

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

Fiscal Year 2020-2025 Stanislaus Urban County Consolidated Plan (Con Plan)

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

In Fiscal Year 2020-2021, the Urban County will be entering its nineteenth year as an Entitlement Jurisdiction for CDBG funds and the seventeenth year as a recipient of ESG funds. There are three specific goals for the CDBG/ESG programs. They are:

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

The proposed Con Plan was designed to address the above program goals by outlining the Stanislaus Urban County's needs and priorities for the plan period. CDBG program funds are designed to serve those at or below 80% of the Area Median Income (AMI). The current 80% AMI in Stanislaus County for one (1) person is \$39,150 and a family of four (4) is \$55,900.

Further, if a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within this targeted income group; this is known as an "area benefit activity" and recognized by HUD as a Low/Moderate Area (LMA). In cases where Urban County members would like to undertake area benefit activities that are not identified as a HUD recognized LMA, door-to-door income surveys of the project areas will be conducted to ensure that they meet the required LMA standards.

The Fiscal Year 2020-2025 Con Plan identifies the following goals to address housing and community development needs:

1. Increase and improve supply of affordable housing
2. Work to end and prevent homelessness
3. Improve infrastructure and public facilities
4. Provide public services
5. Community emergency response
6. Administration

Five of the six goals identified in the draft Con Plan have been past goals utilized by the Stanislaus Urban County to support local needs. The "community emergency response" goal has been added to the draft Con Plan in response to the outbreak of Coronavirus/COVID 19 which has dramatically shifted economic conditions of jurisdictions throughout the Country. This new goal will allow the Stanislaus Urban County to program funding to assist local business and non-profits impacted by COVID 19 through economic development and public service activities.

The Stanislaus Urban County has been awarded supplemental CDBG and ESG funding under the CARES Act in the following amounts:

• CDBG CARES	\$1,358,994
• ESG CARES	698,717
TOTAL CARES	\$2,057,711

Recommendation for the use of the CARES Act funding will be presented to the Board of Supervisors in a separate item as an amendment to the Stanislaus Urban County's existing Fiscal Year 2015-2020 Con Plan and Fiscal Year 2019-2020 AAP. Staff is still working with its HUD representative on final guidance for programing of the CARES Act funding and with the Urban County member cities to identify their specific community needs.

It is staff's understanding that the ESG CARES funding identified above is only the first of two allocations and that additional CDBG CARES funding may also be made available.

While not specifically referenced in the draft Con Plan, the Stanislaus Urban County will maintain the following tools that were introduced in the Fiscal Year 2015-2025 Con Plan, and incorporated into the Sub-recipient Agreements executed by each of the

member cities, in order to provide the Urban County members greater flexibility in funding projects:

- The voluntary shifting of fiscal year allocations among Urban County members to allow members to benefit from larger sums of funding to complete infrastructure projects of larger scale. Any Urban County members wishing to shift their allocations must enter into an independent agreement to be recognized by the County. Cities entering into an agreement to shift funds will be responsible for working out repayment terms amongst themselves if future allocations decline.

To date, no members have entered into an agreement to shift funding, but flexibility to do so is still desired by the members.

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

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

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

The re-use plan and the timing for the use of PI are critical to entire Urban County's ability to maintain overall timeliness with the use of HUD funding.

In addition to CDBG and ESG funding, the Con Plan also recognizes the continued use of Neighborhood Stabilization Program (NSP) PI funding to remove blighted properties via the Abandoned and Dangerous Building Program (ADB). The ADB was integrated into the NSP program to address issues of blight resulting from abandoned and dangerous buildings declared a nuisance in NSP target areas. During this Con Plan cycle the Stanislaus Urban County will take the steps necessary to close-out the NSP program through the use of the remaining PI. Closeout may include undertaking of another affordable housing project or transfer of the NSP PI funding for use towards a CDBG eligible activity. A separate agenda item will be presented to the Board of

Supervisors for closeout of the NSP program. At the time this report was written, the NSP program had a balance of approximately \$394,739 in NSP 1 PI funding and \$717,190 in NSP 3 PI funding.

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN (AAP)

The AAP is an integral component of the Stanislaus Urban County's Con Plan and describes the specific programs and projects that will be undertaken during Fiscal Year 2020-2021. The following is an overview of the funding allocations and projects identified in the AAP:

Funding Allocations

On February 18, 2020 HUD released the following allocation amounts for the CDBG and ESG programs:

•	CDBG	\$2,310,165
•	ESG	<u>202,628</u>
	TOTAL	\$2,512,793

While the overall allocation amount reflects a modest net increase of \$3,892 (with CDBG increasing by \$4,106 and ESG decreasing by \$214), the overall allocation amounts have declined when you factor in the addition of the City of Riverbank. The allocations to each respective Stanislaus Urban County member reflected in the table below have been determined based on the above funding levels and United States Census poverty and population data.

TABLE ONE
FISCAL YEAR 2020-2021 CDBG AND ESG FINAL ALLOCATIONS

Urban County Member	Activities	Administration	Total
Ceres	\$219,870	\$13,797	\$233,667
Hughson	165,187	13,797	178,984
Newman	152,110	13,797	165,907
Oakdale	170,901	13,797	184,698
Patterson	183,508	13,797	197,305
Riverbank	147,549	13,797	161,346
Waterford	233,726	13,797	247,523
Stanislaus County	344,263	340,455	684,718
Public Services	231,017		231,017
Fair Housing		25,000	25,000
CDBG Subtotal	\$1,858,133	\$462,034	\$2,310,165
ESG	187,431	15,197	202,628
Total	\$2,045,564	\$477,231	\$2,512,793

Final allocation amounts for each Stanislaus Urban County member are subject to further refinement based on HUD's approval of the AAP. If there are any funding changes, the allocation will be adjusted proportionately. In addition to the Fiscal Year 2020-2021 allocation identified above, Stanislaus County will plan to utilize approximately \$1,200 in program income collected from repayment of housing assistance loans to fund CDBG activities to be undertaken during the fiscal year. Stanislaus County and Urban County member cities will also carry over any unspent CDBG funds from prior years to use on their respective existing and/or proposed activities.

As part of the proposed allocations, each of the Stanislaus Urban County members receive independent CDBG project administration funding (shown in above table) to cover administrative costs for CDBG related projects. As the lead entity with responsibility for implementing, monitoring and administering CDBG and ESG funding, Stanislaus County receives the majority of the available CDBG administrative funding; which is capped at 20% of the overall CDBG allocation. HUD recognizes Stanislaus County as the sole grantee responsible for administration and oversight of CDBG and ESG funds. Accordingly, the County's Planning and Community Development Department is responsible for the receipt and timely expenditure of funds, environmental documentation for projects, eligibility determination of programs and those persons accessing services of the programs, and program monitoring for the Stanislaus Urban County.

As a HUD mandated requirement, the Stanislaus Urban County must provide a fair housing services program designed to address impediments to fair housing choice through education and investigation to the community. The cost of providing a fair housing services program is subject to the 20% administrative funding cap. The Stanislaus Urban County annually complies with this requirement by contracting with a fair housing service provider selected through a competitive Request for Proposal process.

In addition to the general administration and fair housing activities discussed above, the following is an overview of the projects and activities, by funding source, to be undertaken in Fiscal Year 2020-2021:

Community Development Block Grant (CDBG) Program Funding

Stanislaus County:

On March 28, 2017, the Board of Supervisors approved prioritizing the use of CDBG funds for sewer infrastructure projects. Included in the March 28th agenda item was a discussion of a sewer project prioritization study prepared by the County's Department of Public Works using a methodology based on need, income eligibility, and cost effectiveness. Based on the results of the sewer project prioritization study, Fiscal Year 2018-2019, and 2019-2020 CDBG funds were allocated to the West Modesto Sewer Infrastructure (WMSI) Project, which includes the following top three project areas listed in the study:

Spencer/Marshall – The project area is generally located south of Maze Boulevard, east of the Modesto Irrigation District Lateral No. 5, north of California Avenue, and west of the Briggs Ditch.

Beverly/Waverly – The project area is generally located south of Chicago Avenue, north of Paradise Road, and east of Carpenter Road.

Rouse/Colorado – The project area is generally located between Sutter Avenue and Sunset Avenue, south of South Avenue and north of Garden Avenue.

All together the top three project areas include approximately 1,038 residential, commercial and mixed-use parcels. These parcels currently rely on septic tanks for treatment of sewage. The project's purpose is to provide a sanitary sewer system that will allow property owners to abandon their existing failing septic tanks and connect to a public sewer system.

Environmental review in accordance with CEQA and NEPA has been completed for the entire WMSI Project with the Board of Supervisors adopting a Negative Declaration on July 17, 2018. HUD provided the County an Authority to Use Grants Funds for the WMSI Project on August 3, 2018, that authorized the release of funds for the entire project. In Fiscal Year 2019-2020 the design and engineering work for Spencer/Marshall has been completed and is on-going for the other two project areas. On April 22, 2020, the Local Agency Formation Commission (LAFCO) approved the Outs of Service Boundary Service Request for the Spencer/Marshall area and the bids for construction of Phase One of the Spencer/Marshall area were also opened by County Public Works.

For Fiscal Year 2020-2021, staff is recommending the continued allocation of funding to the WMSI Project with implementation dependent on funding availability. To ensure CDBG timeliness requirements are met, the project will continue to be designed to allow for phased construction in order to mitigate any risk if state funding, to assist with the construction, is delayed or not received. Use of CDBG funds for design without construction occurring is a liability to the County which may require repayment of funds. As such, construction progress must be balanced with design and engineering work. Construction of the first phase of the Spencer/Marshall area, using only CDBG funding, will commence this fiscal year and will be coordinated with the City of Modesto, who anticipates replacing existing water lines in this neighborhood. The coordinated effort will limit the need to reconstruct the affected streets to only once.

The County continues to work with staff from the State Water Board (SWB) to secure funding for the construction of the WMSI project. The SWB has new criteria for allocation of its funding and, as such, the County will need to work with property owners in the project area to secure a commitment to hook-up to the new sewer system within one to two years of project completion. Staff is still working with the SWB staff to determine the exact form of commitment and timing for hook-ups that will be necessary for the County to be competitive in securing SWB funding. Without SWB funding, construction of the project will proceed as CDBG funding is available.

The AAP project descriptions for the WMSI Project allows for targeted sidewalk projects to help the County better regulate the timely expenditure of CDBG funds. However, implementation of these sidewalk projects must occur concurrent with construction of the sewer project, are dependent on the available public right of way to allow for installation of the sidewalk and must be phased in a manner to provides for meaning benefit to pedestrians – avoiding the installation of sidewalks to nowhere.

Because of the need to have small infrastructure projects, such as sidewalk installations and improvements, available to regulate the timely expenditure of CDBG funds, staff is recommending the introduction of an Empire Sidewalk project. The development of a sidewalk connecting A Street to G Street, west of the Santa Fe railroad, was part of an alternative design identified for the Empire Storm Drain Infrastructure project which was removed from the CDBG list of projects in October 2016 due to a lack of community support to cover operations and maintenance costs. County Public Works has assessed the feasibility of a sidewalk only project and determined that there is adequate public right of way available and that the sidewalk can be installed without the existence of a storm water system. Because the community of Empire is not recognized by HUD as an LMA area, an income survey will need to be the first step taken to determine project eligibility for the use of CDBG funding. Staff will work with the County's Chief Executive's Office to identify funding for the income survey and will work with community groups to implement the survey. Once the survey results are validated and accepted by HUD, County staff will be able to proceed with further design and engineering for the Empire Sidewalk project.

City of Ceres:

The City of Ceres will continue with the planning and design of the Morrow Village Improvements Project. The project will result in the installation of curb, gutter, ADA ramps, sidewalk and sidewalk repairs where needed and required. The project area is bounded by Moffett Road to the west, Mitchell Road to the east, Whitmore Avenue to the south and Garrison Road to the north.

City of Hughson:

The City of Hughson will continue the planning and design of the Walker Lane Infrastructure Improvements Project. The project is part of a multi-year effort to complete sidewalk infill projects to improve connectivity, mobility and access for non-motorized users of the City of Hughson. This project will include the sidewalk infill, curb, gutter, ADA ramps, storm drainage improvements, and street paving as necessary. The project area is located along Walker Lane between Tully Road and Second Street and Tully Road between Fox Road and Walker Lane.

City of Newman:

The City of Newman will continue the planning, design and engineering for improvements to the Hill Park Area and Steffensen Park Area that includes ADA improvements. These projects will also result in the installation/repair of curb, gutter, sidewalk, and driveways along with tree removal, street repair and overlay due to severe damage from tree roots within the project area.

City of Oakdale:

The City of Oakdale will continue to work on the planning, design and engineering work on the Wood Basin Area Storm Drain Improvements (formerly named Block 3 Flood Control Project). The project will provide improved flood control measures for the area

of West H Street, West I Street, South Wood Street, Wanda Way and Hinkley Avenue. Due to the overall cost and project changes, the City of Oakdale has had to accumulate a few years of CDBG funding in order to be able to proceed with the construction of the project.

City of Patterson:

The City of Patterson will begin the planning and design of the Washburn Infrastructure Improvements Project. This project includes the installation of curb, gutter, sidewalk and ADA improvements. Project will be phased out and costs include design, engineering and construction. The Washburn Infrastructure Improvements Project is bounded by Washburn Street to the north, Tyler Street to the east, Tenbrink Lane to the south and N. First Street to the west.

City of Riverbank:

The City of Riverbank will begin the planning, design and engineering work on three projects that are multi-year projects that will be phased based on funding availability and will include design, engineering, and construction costs. The Castleberg Park Trail project includes rehabilitation and repairs for pedestrian safety improvements to the walkway/trail loop located at Castleberg Park on the corner of Kentucky and 8th Street. Both the Castleberg Park and the Pioneer Park projects will include ADA enhancements to ensure accessibility by the disabled community to areas such as the playground, restrooms, and the baseball fields. The Pioneer Park project is located at the corner of 1st and High Street and Castleberg Park is located at the corner of Kentucky & 8th Street.

City of Waterford:

The City of Waterford will continue the planning, design and engineering work on the Main Street Infrastructure Project with construction tentatively scheduled for Spring 2021. The project will consist of in-fill type infrastructure improvements including sidewalk, curb, gutter and ADA ramps. The project will also include installation of new paving between sidewalks and existing paving, installation of storm drainage, and water and sewer line improvements. The Main Street Infrastructure Project area is on the north side of Main Street between H Street and I Street.

The majority of projects proposed in the Stanislaus Urban County are not located within a Low-Moderate Area (LMA) as reflected in HUD's 2010 Census Block Group data and, as such, do not meet the LMA benefit requirements allowing projects to proceed without individual door-to-door income surveys being conducted. An income survey is needed to verify that at least 51% of the households in the project area are low-income, thus meeting CDBG income eligibility thresholds. According to HUD data, the County's proposed West Modesto Area sewer infrastructure project areas are within the qualified census tract areas, and income surveys for those areas will not be required. Unlike Stanislaus County, an income survey will be required to be completed for future projects for each Urban County city within the next two years.

County staff has developed an income survey tool meeting HUD's standards and will be coordinating with cities to conduct all necessary surveys prior to the release of CDBG funding, in order to not delay project implementation. Considering known neighborhood conditions and neighborhood demographics, there is confidence that the identified project areas will meet CDBG LMA income eligibility thresholds; however, if an area fails to meet the eligibility threshold, an amendment to the AAP to identify an alternative project may be required.

CDBG Public Services Grants (CDBG-PSG):

CDBG funds provide the opportunity for the Stanislaus Urban County to fund non-profit organizations that provide public services. These funds are for use in low income neighborhoods and for providing services to households with incomes that are 80% and below the Area Median income (AMI). In accordance with HUD public services cap regulations which restricts the use of CDBG funds to no more than 15% of an entitlement jurisdiction's grant allocation, approximately ten percent of the total Fiscal Year 2020-2021 CDBG allocation, estimated to be \$231,017 is proposed to be set-aside for this purpose. As part of this funding cycle, the Stanislaus Urban County received and reviewed sixteen competitive applications for CDBG-PSG funding. Organizations that have applied for CDBG-PSG funding include, but are not limited to, organizations that provide services to at-risk youth, seniors, and the homeless. The draft AAP includes CDBG-PSG funding recommendations for the following organizations:

Court Appointed Special Advocates (CASA) – Direct Services Project
Center for Human Services – Ceres Partnership-Concrete Support in Times of Need
Center for Human Services – Oakdale Family Resource Center-Crisis Support Program
Center for Human Services – Westside Family Resource Centers-Supportive Services
Children's Crisis Center – Single Parent Intervention Services @ Guardian House
Children's Crisis Center – Single Parent Intervention Services @ Marsha's House
Children's Crisis Center – Single Parent Intervention Services @ Verda's House
The Salvation Army Red Shield – At Risk Teen Program
United Samaritans Foundation – Daily Bread Mobile Lunch Program-Hughson
United Samaritans Foundation – Daily Bread Mobile Lunch Program-Westside

The organizations recommended for funding remain the same as those listed in the draft AAP made available for public review. Attachment 4 includes a list of all CDBG-PSG grant applications, along with Emergency Solutions Grants (ESG) Program grant applications discussed later in this report, received (in order of highest to lowest ranking) with grant applications recommended for funding reflected in bold and italic print. Recommendations for funding were made by a grant review panel consisting of eight members: one representing each of the Stanislaus Urban County's seven members, and a representative from the Stanislaus Community System of Care (CSOC), the locally recognized Continuum of Care (CoC).

Upon approval of the CDBG-PSG funding recommendations, technical adjustments may be needed if a funded organization fails to meet contract requirements or is found to be ineligible to receive funds. All funding recommendations are subject to final HUD

approval and funding availability. If an organization is found to no longer be eligible, funding will be awarded to the next highest-ranking organization.

Small Business Assistance Program:

While HUD regulations allow for up to 15% of the annual CDBG allocation be used for Public Services, the Stanislaus Urban County has traditionally only allocated 10%. In response to the COVID 19, staff is proposing that an additional 5% of this fiscal year allocation be made available to provide financial and technical assistance for small business affected by COVID 19. The program could provide small business loans and grants to business in the Stanislaus Urban County area. Due to the timing to release the draft AAP, the program is proposed to be funded in the amount of \$115,000 by funds that were to be allocated to Stanislaus County infrastructure projects. If actions are taken to implement this program, adjustments will be made to the infrastructure allocation of the member cities wishing to have their communities included in the program. Under the Stanislaus Urban County's Citizen Participation Plan adjustments between approved programs in an amount not to exceed \$150,000 may be made at the staff level. The actual criteria and authorization for expenditure of the small business assistance program will be brought back to the Board of Supervisors as a separate item for consideration. The funding proposed for this program could also be adjusted for use in the Community Emergency Response program discussed below.

Community Emergency Response Program:

In response to the community's need for support and additional services as a result of an outbreak of COVID 19, this program has been developed to provide resources for Urban County members and agencies to address the needs of residents impacted by COVID-19. Eligible activities under this program include but are not limited to: acquisition, construction and rehabilitation of buildings, public services, and economic development activities.

At this time, a specific funding amount has not been assigned to this program. As discussed above, there is flexibility to make funding adjustments without the need to amend the AAP. The County will be working with the community to identify and confirm the needs within the Stanislaus Urban County. The program will also allow the Stanislaus Urban County to respond to any new HUD funding specifically targeted to COVID 19 relief. Once needs are identified and funding levels known, a separate item will be brought back to the Board of Supervisors to authorize program funding.

Emergency Solutions Grants (ESG) Program Funding

As with CDBG-PSG funding, Federal ESG funds allow the opportunity for the Stanislaus Urban County to fund non-profit organizations that provide public services to the homeless. These funds are for providing homeless prevention assistance to individuals and households that are 30% AMI and are at risk of homelessness or are experiencing homelessness. Federal ESG funds will be used to provide operational and essential services funding for transitional and emergency homeless shelters, for the development of the Homeless Management Information System (HMIS), and to provide financial

assistance, in combination with case management, to stabilize housing for persons experiencing homelessness or who are at-risk of becoming homeless.

Funding priority is given to Rapid Re-Housing grant applications that score the highest. Once the minimum HUD funding requirement is met for the Rapid Re-Housing category, Shelter and HMIS grant applications are funded according to the highest ranked score. Per HUD's ESG program regulations, a maximum of 60% of the ESG grant allocation may be used to fund shelter activities and 7.5% for HMIS activities. The County's ESG administration allowed funding amount is capped at 7.5% of the overall ESG grant allocation and that is separated from the overall funding allocation made available to service providers. This year, the Stanislaus Urban County received and reviewed three Federal ESG competitive applications for funds (the application review was conducted by the same review committee identified above for PSG funding). The draft AAP includes Federal ESG funding recommendations for the following organizations:

Community Housing and Shelter Services – Homeless Management Information System (HMIS) Data Support

Family Promise – Shelter to Solutions New Beginnings Program

We Care Program – Emergency Shelter Program

The organizations recommended for funding remain the same as those listed in the draft AAP made available for public review. Upon approval, technical adjustments may be needed if a funded organization fails to meet contract requirements or is found to be ineligible to receive funds. All funding recommendations are subject to final HUD approval and funding availability. If an organization is found to no longer be eligible, funding will be awarded to the next highest-ranking organization.

In addition to the Federal ESG funding allocation, Stanislaus County is certified by the State of California's Department of Housing and Community Development (HCD) and was appointed by the local Continuum of Care (CoC), as the Administrative Entity (AE) for continued receipt of State ESG funds. These funds may be used countywide and are not limited to the Stanislaus Urban County area. As with the Federal ESG, State ESG may be used to fund service providers that assist the homeless and those at risk of homelessness whose household income is at 30% AMI or below. HCD requires Stanislaus County, as the AE, to respond to a Notice of Funding Availability (NOFA) process and submit an authorizing resolution for obtaining these funds. A request for the authorizing resolution will be presented to Board of Supervisors for consideration later this year and will include funding recommendations. The local grant application process for state ESG funding was conducted concurrent with the Federal ESG application process based on the current estimated funding allocation amount of \$268,689. Three applications for state ESG funding were received for an amount less than the estimated funding allocation level. HCD has indicated that they will allow the Federal ESG and CDBG-PSG grant applications submitted for funding to be used by Stanislaus County in proposing funding recommendations for state ESG funds, if the proposed programs are deemed eligible by HCD. Funding recommendations for the 2020 California ESG funding allocation were brought to the Board of Supervisors at the May 5, 2020 Board of Supervisors meeting and will be submitted to HCD.

Neighborhood Stabilization Program (NSP) Funding

In Fiscal Year 2020-2021, NSP Program Income will continue to be available to all Stanislaus Urban County members to fund the removal of blighted and dangerous buildings in NSP target areas. County staff will also continue to work with the Stanislaus Regional Housing Authority to finalize housing development on the remaining inventory of vacant properties acquired in previous years using NSP funds.

On February 27, 2018, the Board of Supervisors approved a Substantial Amendment to the NSP 1 and 3 Action Plans to fund affordable housing projects to be located on NSP acquired properties, including Oak Leaf Meadows in the City of Oakdale and three in-fill housing sites in the Modesto unincorporated area. The amendments involved approximately \$4,660,000 in NSP 1 and 3 Program Income funds. The Oak Leaf Meadows project proposal consists of 56 multi-family affordable housing units, consisting of two and three-bedroom housing units on a 3.29+/- acre property that includes a 5,000 square foot community center and a day care/ head start facility is under construction and NSP funding has already been expended. Construction completion and occupancy of the project is scheduled to occur in Fiscal Year 2020-2021. As discussed earlier in this report, staff will begin the process to close-out the NSP program this fiscal year. Stanislaus County currently has a balance of \$394,739 in NSP 1 and \$717,190 in NSP 3 program income funding. The identification of a project to expend the unspent funding is critical to project close-out in order to avoid timeliness issues with the expenditure deadline for CDBG funding. A separate item will be brought to the Board of Supervisors for consideration of the NSP program close-out.

HOME Investment Partnerships Program (HOME) Funding

The Stanislaus Urban County is also a member of City of Turlock/Stanislaus County HOME Investment Partnerships (HOME) Consortium (referred to as the "HOME Consortium"). The City of Turlock is the "lead entity" with responsibility for implementing, monitoring, and administering the HUD funded HOME Investment Partnerships Program (HOME) funds for the HOME Consortium.

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

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

The Fiscal Year 2020-2021 estimated HOME Consortium allocation is \$1,363,238 (allocation amount for the entire HOME Consortium). Fiscal Year 2020-2021 HOME program funding will be determined and adopted by the City of Turlock and submitted for final approval to HUD via a submittal of an Annual Action Plan.

Currently, the City of Turlock contracts independently with each of the Stanislaus Urban County members. The City of Turlock's draft Fiscal Year 2020-2021 AAP detailing HOME activities to be undertaken and estimated funding allocations among the HOME Consortium members will be taken to the Turlock City Council on May 12, 2020 for review and approval. The City of Turlock's draft Fiscal Year 2020-2021 AAP can be accessed at the City's website: <https://www.cityofturlock.org/housingprograms/programplansreports/>.

Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice (AI)

Along with the Consortium Con Plan and AAP, a Regional Analysis of Impediments to Fair Housing Choice (AI) has also been prepared. In addition to the City of Turlock, the AI has been prepared in partnership with the City of Modesto and the Stanislaus Regional Housing Authority.

The AI is developed to identify the potential barriers ("impediments to fair housing choice") that residents of Stanislaus County may face by looking at housing, demographics, fair housing data, and neighborhood opportunities for outward signs of housing discrimination and indicators of patterns of discrimination that may not be obvious.

The impediments identified in the AI will work to inform policy and programs through the County. The following is a summary of key findings of fair housing challenges:

1. Affordability and Costs: high cost of housing, lack of affordable housing, application fee, deposits and up-front costs.
2. Income: Low wages, people on fixed-incomes, and Section 8 Vouchers.
3. Price-setting: Profit-driven sensibility of landlords
4. Supply and Demand: Short supply of affordable housing, and limits on new housing developments, shortage of farmworker housing, lack of housing for students, long waitlists for housing units.

The Draft AI concludes with an overview of the impediments identified in the Fiscal Year 2015-2020 Analysis of Impediments to Fair Housing reports previously adopted by the partnering agencies along with the actions taken to remove those barriers, and impediments identified in the draft Fiscal Year 2020-2025 AI and actions that can be taken to address those barriers. The following is a summary of the Fiscal Year 2020-2025 impediments and corresponding action items:

1. Turlock's zoning definitions do not match as there is an age discrepancy (between 55-60) in the definition of "senior housing" and difference in the allowable household relationships of senior housing residents with a non-spouse

domestic partner, primary physical/economic support person, and/or disabled child, grandchild, or partner under the age of 60.

Action: Consider revision of zoning ordinance definition of “senior housing” in Turlock to align with Section 43-53.7 of the Civil Code of the State of California.

2. In Stanislaus County, 44 percent of households earning \$20,000 or less annually do not have Internet access, while only 6 percent of households making at least \$75,000 do not have access. In the state, about half of households without Internet access cite the cost of broadband service or a computer/device for their lack of access. A statewide survey indicates three in four of these households do not know they may qualify for discounted, income-based Internet service in California.

Action: Pursue conducting, funding, and/or facilitating Internet service financial assistance education and outreach activities that target low-income residents of Stanislaus County.

3. There is a limited knowledge of fair housing rights among the general population.

Action: Support outreach activities that educate tenants, the owners and agents of rental properties, and all others who interact with housing transactions regarding their fair housing rights and responsibilities.

Action: Provide educational literature in English, Spanish, and other appropriate languages.

Action: Provide education and fair housing referral information to organizations who interact with and serve low-income or protected class populations in order to identify potential fair housing violations.

4. Discrimination in rental housing often occurs without legal complaint and opportunity for redress/ resolution to fair housing violations.

Action: Support enforcement of fair housing rights through advocacy and legal support for those persons who allege incidents of fair housing discrimination.

5. There is support and assistance need for homeowners who have experienced foreclosure, homeowners and renters who are members of a protected class, and others who must find affordable living arrangements.

Action: Finance, facilitate, and otherwise support affordable housing programs within all Stanislaus County jurisdictions, including those that support the creation or preservation of affordable housing, rehabilitation of substandard housing, and/or assistance to homeowners and renters in need of disability modifications.

Action: Continue to support the Stanislaus Housing Authority Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at government buildings.

Action: Promote economic development and job training activities to increase job opportunities and wages of low-income residents in order to increase overall household income and reduce housing cost burden.

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

PUBLIC COMMENT

During the 30-day public review and comment period, three requests to have the documents provided in Spanish were received from: Rafael Rodriguez a resident of the community of Empire, Marylou Pelayo, a City of Turlock resident, and Miguel Donoso, a representative of the Hispanic Taskforce. Miguel Donoso also made the request during the Board of Supervisors' April 21, 2020 public meeting. In response to the requests, and in consultation with HUD, a summary of the draft documents was prepared and both an English and Spanish version were made available to the public. Copies of the Spanish version were provided directly to those requesting the translation. The translated summary meets HUD's requirements for reasonably accommodating the requests. Any addition written or verbal comments received by staff will be presented to the Board of Supervisors prior to consideration of this item

POLICY ISSUE:

As per Federal regulation 24 CFR Part 91, HUD Entitlement Jurisdictions are required to hold a public hearing in accordance to the locally adopted Citizen Participation Plan (CPP) for the Consolidated Plan (Con Plan), Annual Action Plan (AAP), and Analysis of Impediments. The public hearing must allow for residents and community stakeholders an opportunity to respond to the planned activities by the entitlement jurisdiction to address the needs of the underserved, homeless and those at risk of becoming homeless.

Federal Community Development Block Grant (CDBG), Emergency Solutions Grants (ESG) Program, Neighborhood Stabilization Program (NSP), and HOME Investment Partnerships (HOME) funding will serve to provide needed infrastructure improvements, housing, economic development, homeless prevention, rapid re-housing, shelter and public services to individuals and families throughout Stanislaus County. These programs and services outlined in the proposed draft Annual Action Plan (AAP) are consistent with the goals and objectives of the proposed draft Con Plan, the County's Focus on Prevention efforts, and the General Plans, specifically the Housing Elements, of the respective Stanislaus Urban County members.

FISCAL IMPACT:

Based on the funding allocation amounts released by HUD on February 18, 2020, the Stanislaus Urban County will have available \$2,512,793 in CDBG and ESG funding in Fiscal Year 2020-2021.

Fiscal Year 2020-2021 CDBG funding, estimated to be \$2,310,165, in addition to \$4.5 million in unspent encumbered prior fiscal year funding is available to the Stanislaus Urban County for the existing HUD approved projects, until it is expended. As per Federal regulations, CDBG funds must be spent within seven years and ESG funds within two years, or the funds would be released back to HUD. The County will be receiving an estimated \$202,628 in federal ESG funding for Fiscal Year 2020-2021. The oldest allocation of CDBG and EGG funds are required to be drawn first. Currently, Stanislaus County has CDBG allocated funds as far back as Fiscal Year 2014-2015 and ESG allocated funds available back to Fiscal Year 2018-2019. The County also currently holds a balance of \$394,739 in NSP 1 and \$717,190 in NSP 3 program income funding. This funding is anticipated to be utilized during Fiscal Year 2020-2021 for primarily housing development activities and includes the Abandoned and Dangerous Buildings program.

The AAP is a required submittal to HUD and is used to obligate the funds and establish the operational plan for the listed projects within the plan. Appropriations for Stanislaus County's allocations will be requested through the Fiscal Year 2020-2021 Proposed Budget process.

BOARD OF SUPERVISORS' PRIORITY:

The recommended actions are consistent with the Board's priority of *Supporting Strong and Safe Neighborhoods, Supporting Community Health, and Delivering Efficient Public Services and Community Infrastructure* by providing the community with the necessary funds to implement needed programs and projects.

STAFFING IMPACT:

Administrative oversight of all Community Development Block Grant Program (CDBG) and Emergency Solutions Grants (ESG) Program funds allocated to the Stanislaus Urban County will be assumed by existing Planning and Community Development staff.

CONTACT PERSON:

Angela Freitas, Planning & Community
Development Director

Telephone (209) 525-6330

ATTACHMENT(S):

1. FY 2020-2025 Regional Analysis of Impediments to Fair Housing
2. FY 2020-2025 Consolidated Plan
3. FY 2020-2021 Annual Action Plan
4. FY 2020-2021 CDBG-PSG and ESG Applications Received and Recommended Awards

ATTACHMENT 1

Stanislaus County

Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice

For HUD Entitlement Grantees:

Stanislaus Urban County, City of Modesto, City of Turlock

&

HUD Public Housing Authority: Stanislaus Regional Housing Authority

This is the final version of the “Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice”. New wording is indicated in bold font and deleted wording is reflected in strikethrough font. *

*Note: Bold and strikethrough text was not used for administrative cleanup.

FINAL DRAFT MAY 12, 2020

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EXECUTIVE SUMMARY

The Federal Fair Housing Act of 1968 banned discrimination against groups who historically faced unequal treatment in all types of housing. These groups are called “protected classes” under the law. It is important to acknowledge historical discrimination and segregation as well as current ongoing discrimination and barriers to housing choice. Housing barriers are influenced by policies and ordinances developed at all levels of government as well as commercial decisions such as mortgage lending criteria and housing development.

The Department of Housing and Urban Development (HUD) enforces the Federal Fair Housing Act, and as such requires communities receiving HUD funds to “affirmatively further fair housing” or make meaningful actions to remove barriers to housing choice.

The Analysis of Impediments to Fair Housing Choice (AI) is developed to identify the potential barriers (“impediments to fair housing choice”) that residents of Stanislaus County may face by exploring housing, demographic, fair housing data, and neighborhood opportunity for outward signs of housing discrimination and indicators of patterns of discrimination that may not be obvious.

The impediments identified in this document will work to inform policy and programs throughout the County. The Stanislaus County Regional AI has been created as a collaborative document between the Stanislaus Regional Housing Authority, Stanislaus Urban County (including the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford), the City of Modesto, and the City of Turlock.

Summary of Key Findings

1. There is currently a low supply of affordable housing and limits on new housing development, with long waitlists for existing affordable housing units. There is a particular shortage in housing for farmworkers and students.
2. Homeowner housing (both single-family homes and condos) values have increased steadily in all Stanislaus County municipalities since 2012. The highest values are in Oakdale, with a typical housing unit worth \$368,000 in 2019. The lowest value for a typical house in 2019 is in Waterford, about \$270,000.
3. California’s Assembly Bill 686 (AB-686) sets forth many housing regulations including the requirement that all public agencies working within housing and community development must “affirmatively further fair housing”.
4. Stanislaus County is projected to grow by 800,000 residents, a 37 percent increase, in the next 40 years. The County has grown more diverse in terms of race and ethnicity over the past 30 years, reflected in current geographic residence patterns and primary language spoken at home.
5. Housing affordability is 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.
6. 44 percent of Stanislaus County households earning \$20,000 or less annually do not have Internet access, while only 6 percent of households making at least \$75,000 do not have access.
7. Disability remains the highest reported category for fair housing discrimination in the County.

Analysis of Impediments Overview

The Analysis of Impediments to Fair Housing Choice (AI) is a requirement imposed on recipients of certain federal grants from the U.S. Department of Housing and Urban Development (HUD). The development of the AI is part of each HUD grant recipient's obligation to 'affirmatively further fair housing' (AFFH). Section 808 of the Fair Housing Act defines AFFH as a legal requirement that federal grantees conduct HUD funded programs in a manner that furthers fair housing within the jurisdiction.

To accept funding from HUD, entitlement grantees must certify to affirmatively further fair housing by taking actions to further the goals identified in this AI and to not take actions that are inconsistent with their obligation to affirmatively further fair housing. (24 CFR §91.225(a)(1))

The Community Development Block Grant (CDBG) program also requires jurisdictions to certify compliance with anti-discrimination laws found in Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations. 24 CFR §91.225(b)(6)

This document is the Stanislaus Urban County, City of Modesto, City of Turlock, and the Stanislaus Regional Housing Authority's first regional AI. Previously, Stanislaus Urban County and the City of Turlock conducted a regional AI together for the 2020-2025 AI, the City of Modesto and the Housing Authority have joined the efforts.

Although the AI is not required as part of the annual submission to HUD, HUD recommends that each jurisdiction regularly update its AI. HUD has suggested that the AI be conducted at least as often as the Consolidated Plan, which is required every five years. The Stanislaus Urban County, the City of Modesto, and the City of Turlock's current Consolidated Plans are valid through June 2020. The Stanislaus Regional Housing Authority is required to submit a plan every 5 years and is currently working within the *5-Year Plan for Fiscal Years 2019-2023*.

An AI is conducted so that communities are provided an opportunity to examine their progress toward their goals of eliminating illegal housing discrimination and providing current and future residents access to equal housing opportunities. As part of the AI process, communities identify specific barriers ("impediments") to fair housing choice and create action steps to remove or reduce these barriers.

This AI document assesses the extent of fair housing issues among specific groups by analyzing data for all Stanislaus County cities and the general region in relation to housing, demographics, and neighborhood opportunity. This AI also analyzes conditions in the private market and public sector that may limit the range of housing choices or impede access to housing.

Geography

This Stanislaus County Regional AI is a collaborative document between the Stanislaus Regional Housing Authority the three entitlement grantees within the County:

- Stanislaus Urban County
- City of Modesto
- City of Turlock

Stanislaus Urban County includes all unincorporated areas of the County and the following cities:

- Ceres
- Hughson
- Newman

- Oakdale
- Patterson
- Riverbank
- Waterford

Throughout this document, the following geographic terms may be used. To be clear, below is an explanation of each geographic term.

- **Stanislaus County (countywide):** Includes all cities within Stanislaus County as well as the unincorporated areas.
- **Stanislaus Urban County:** Includes the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford. The Urban County also includes the unincorporated areas.
- **Unincorporated areas/County:** Areas of Stanislaus County that are not part of any municipality.
- **Entitlement Grantee:** The Community Development Block Grant (CDBG) entitlement grantees are Stanislaus Urban County, Modesto, and Turlock.
- **HOME Consortium:** The members of the HOME Consortium are the Stanislaus Urban County and the City of Turlock. The City of Turlock is the lead entity of the HOME Consortium.

BACKGROUND

Fair Housing Laws

Federal Law(s)

All municipalities in the United States are subject to the Fair Housing Act, administered and enforced by HUD.

In 1968, the Civil Rights Act was signed into law by President Lyndon Johnson to prohibit housing discrimination on the basis of race, religion, color, sex, and national origin. Title VIII of the act is also known as the Fair Housing Act. The law was passed after years of advocacy within the United States against overt race-, gender-, and religious-based discrimination and segregation in the sale and rental of housing. Additional protections were added for family status (women who are pregnant or the presence of children under 18) and disability in an amendment to the Fair Housing Act signed in 1988.

The Fair Housing Act applies to almost any person or group involved with housing in the United States, including landlords, realtors, homeowners associations (HOAs), mortgage lenders, and homeowners insurance companies. These people or groups cannot discriminate on the basis of race, religion, color, sex, national origin, familial status, or disability, which are also known as “protected classes.” It is illegal to take any of the following actions on the basis of protected class:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Otherwise make housing unavailable
- Set different terms, conditions, or privileges for sale or rental of a dwelling
- Provide a person different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- Make, print, or publish any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination

- Impose different sales prices or rental charges for the sale or rental of a dwelling
- Use different qualification criteria or applications, or sale or rental standards or procedures, such as income standards, application requirements, application fees, credit analyses, sale or rental approval procedures, or other requirements
- Evict a tenant or a tenant's guest
- Harass a person
- Fail or delay performance of maintenance or repairs
- Limit privileges, services, or facilities of a dwelling
- Discourage the purchase or rental of a dwelling
- Assign a person to a particular building, neighborhood, or section of a building or neighborhood
- For profit, persuade or try to persuade homeowners to sell their homes by suggesting that people of a particular protected characteristic are about to move into the neighborhood (blockbusting)
- Refuse to provide or discriminate in the terms or conditions of homeowners insurance because of the race, color, religion, sex, disability, familial status, or national origin of the owner and/or occupants of a dwelling
- Deny access to or membership in any multiple listing service or real estate brokers' organization
- Refuse to make a mortgage loan or provide other financial assistance for a dwelling
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising a dwelling
- Condition the availability of a loan on a person's response to harassment
- Refuse to purchase a loan

It is also illegal to threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise the right, or retaliate against a person who has filed a fair housing complaint or assisted in a fair housing investigation.

Exempted from the federal law are owner-occupied buildings with no more than four units, single-family houses sold or rented by the owner without an agent, and housing operated by religious organizations or private clubs that is limited to members. The State of California or local laws can add additional protections but cannot take away Fair Housing Act protections.

Table 1: Protected Classes in Stanislaus County by Enforcement

Jurisdiction

Federal	State
<ul style="list-style-type: none"> • Race • Color • National Origin • Religion • Sex • Familial Status • Disability 	<ul style="list-style-type: none"> • Source of Income • Marital Status • Sexual Orientation • Gender Identity • Domestic Partnership

Examples of illegal housing actions under the Fair Housing Act are:

- An apartment manager only offering apartment units to families with children within one half of an apartment building.

- A landlord giving a \$10 application fee discount to housing applicants who attended the local high school.
- A realtor falsely declaring a house already has a purchase offer when showing a house to a couple who recently immigrated to the United States.
- An apartment manager running a credit check only on applicants under 30 years old.
-

Housing for Seniors

The Housing for Older Persons Act of 1995 (HOPA) creates an exception to Title VIII of the Fair Housing Act to allow for senior housing developments.

HOPA exempts specific types of housing for seniors (“older persons” in the law) from family status discrimination liability. To qualify for the “housing for older persons” exemption, the housing must fit certain criteria and comply with all the requirements of the exemption. These types of housing may be:

1. Provided under a state or federal program that the Secretary of HUD has determined to be specifically designed and operated to assist elderly persons (as defined in the state or federal program); or
2. Intended for, and solely occupied by persons 62 years of age or older; or
3. Intended and operated for occupancy by persons 55 years of age or older. (At least 80 percent of the units must have at least one occupant who is verified to be 55 years of age or older.) (Pub.L. 104–76, 109 Stat. 787, enacted December 28, 1995)

All other Fair Housing Act protects apply to housing for seniors including the prohibition from discrimination on the basis of race, color, religion, sex, disability, or national origin. (The Fair Housing Act: Housing for Older Persons, HUD Office of Fair Housing and Equal Opportunity)

Additional Protections for Persons with Disabilities

:

Housing providers are required to make reasonable accommodations and allow reasonable modifications that allow persons with disabilities to enjoy their housing. Under the Fair Housing Act, a person with a disability includes: Individuals with a physical or mental impairment that substantially limits one or more major life activities; individuals who are regarded as having such an impairment; and individuals with a record of such an impairment. Major life activities include walking, seeing, hearing, speaking, breathing, and working.

An accommodation is a change in any rule, policy, procedure, or service needed in order for a person with a disability to have equal access to and enjoyment of their home. For example, allowing a service animal despite a “no pets” policy or allowing a tenant to mail in a rent check when others must physically deliver checks to a drop box.

A modification is a structural change made to the existing premises occupied or to be occupied by a person with a disability in order to afford such person full enjoyment of the premises. A ramp installed into the front entrance of a house where there are only stairs, changing doorknobs to levers for someone with a mobility disability, or allowing a tenant with a sight impairment to install visual doorbells are all examples of reasonable modifications.

Advertising:

All types of housing advertising are governed by the Fair Housing Act, including paper flyers, newspaper ads, advertising on websites, and lawn signs. Advertisements cannot show a preference, a limitation, or discrimination based on protected class. Examples of illegal advertisements are:

- A lawn sign outside an apartment building that includes “sorry, no kids.”
- A realtor’s flyer for an open house only distributed in local churches.
- Website ads that claim an apartment is “perfect for young professionals.”

The National Fair Housing Alliance recommends that instead of focusing on who an ideal tenant would be or what type of person would likely not like a housing unit, an advertisement for housing should focus on the property characteristics and the amenities. Advertisements should be available to a broad number of people.

Additional Protections for Persons with Disabilities

:

Housing providers are required to make reasonable accommodations and allow reasonable modifications that allow persons with disabilities to enjoy their housing. Under the Fair Housing Act, a person with a disability includes: Individuals with a physical or mental impairment that substantially limits one or more major life activities; individuals who are regarded as having such an impairment; and individuals with a record of such an impairment. Major life activities include walking, seeing, hearing, speaking, breathing, and working.

An accommodation is a change in any rule, policy, procedure, or service needed in order for a person with a disability to have equal access to and enjoyment of their home. For example, allowing a service animal despite a “no pets” policy or allowing a tenant to mail in a rent check when others must physically deliver checks to a drop box.

A modification is a structural change made to the existing premises occupied or to be occupied by a person with a disability in order to afford such person full enjoyment of the premises. A ramp installed into the front entrance of a house where there are only stairs, changing doorknobs to levers for someone with a mobility disability, or allowing a tenant with a sight impairment to install visual doorbells are all examples of reasonable modifications.

Section 504

Section 504 of the Rehabilitation Act of 1973 (“Section 504”) states that “no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under” any program or activity that receives Federal financial assistance.

The law applies to housing with 5 or more units funded with Federal funds by requiring accessibility features in some dwelling units (a unit that is located on an accessible route and can be approached, entered, and used by individuals with physical disabilities) and all public areas in all new construction or substantial rehabilitation. At least 5 percent of new construction units in a federally funded development, or at least one unit, must meet accessibility standards to people with physical disabilities, and at least 2 percent, or at least one unit, must meet accessibility standards for hearing or visual disabilities. The standards for these units are found in the Uniform Federal Accessibility Standards (UFAS).

Section 504 regulations also apply to public buildings operated by agencies funded by federal assistance like housing authorities and schools.

Other Federal Laws

Other federal laws governing housing rights are:

- Title VI of the Civil Rights Act of 1964
- Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act of 1990
- Violence Against Women Act of 1994
- Equal Credit Opportunity of 1974

In addition, all HUD-funded housing programs are prohibited from discriminating based on sexual orientation, gender identity, or marital status under the 2016 Equal Access Rule.

While not law, the National Association of Realtors Code of Ethics prohibits licensed Realtors from discriminating based on sexual orientation. This code of ethics applies to all members of the California Association of Realtors.

California Law

The state of California expands Fair Housing Act protections under the Fair Employment and Housing Act (FEHA) enforced by the Department of Fair Employment and Housing within the Business, Consumer Services, and Housing Agency. All jurisdictions within California, including all in Stanislaus County, are governed by the FEHA, which prohibits discrimination in housing on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, or genetic information.

Additional Protected Groups

The Unruh Civil Rights Act adds the additional protected classes: immigration status, primary language, citizenship, and arbitrary characteristics (age, occupation, etc.)

Until 2019, the definition of “source of income” in the FEHA did not include Section 8 Housing Choice Vouchers or other types of rental assistance. SB 329, passed in 2019, expands the definition of source of income to all “federal, state, or local public assistance and federal, state, or local housing subsidies,” including Section 8 Housing Choice Vouchers. This law will go into effect January 1, 2020.

Another bill that went into effect January 1, 2020 (SB 222) adds Veterans and Military Status to the persons protected under the FEHA.

California Civil Code 1946.7 gives housing protections to victims of domestic violence, sexual assault, stalking, abuse of an elder or dependent adult, or human trafficking. Under this law, a landlord may not terminate a tenancy or fail to renew a tenancy based upon a tenant or a tenant’s household member being a victim of one of these crimes.

Additional Protected Housing

The California FEHA covers additional types of housing not covered under the Federal Fair Housing Act. The California FEHA covers *any building, structure, or portion thereof that is occupied as, or intended for occupancy as, a residence by one or more families and any vacant land that is offered for sale or lease for the construction thereon of any building, structure, or portion thereof intended to be so occupied.*

An exception to this law is rent or lease of a portion of an owner-occupied single-family house to a person as a roomer or boarder living within the household. Though these types of houses are exempt from most FEHA requirements, in this type of housing, discriminatory advertisements are not allowed; the only exception is housing advertised as available only to persons of one sex where living spaces will be shared, e.g., “looking for female roommate.”

AB 1497, which went into effect January 1, 2020, extends the types of housing covered by the FEHA to include housing posted to online hosting platforms like AirBnB or VRBO.

California’s FEHA also applies to government actions for property, such as restrictive covenants, zoning laws, approval or denial of use permits, and other actions authorized under California’s Planning and Zoning Law that make housing opportunities unavailable.

Housing for Seniors

In California, there is an exemption for seniors to the Unruh Civil Rights Act which prohibits discrimination based on sex, race, color, religion, ancestry, national origin, age, disability, medical condition, genetic information, marital status, or sexual orientation.

To restrict sale or rental of a property to seniors in California and be exempt from age discrimination under Unruh, the resident must:

1. Be 62 years of age or older; or
2. Be 55 years of age or older in a “senior citizen housing development”.

A “Senior citizen housing development” is “a residential development developed, substantially rehabilitated, or substantially renovated for, senior citizens that has at least 35 dwelling units.” Furthermore, the Unruh Civil Rights Act states:

Any senior citizen housing development which is required to obtain a public report under Section 11010 of the Business and Professions Code and which submits its application for a public report after July 1, 2001, shall be required to have been issued a public report as a senior citizen housing development under Section 11010.05 of the Business and Professions Code. No housing development constructed prior to January 1, 1985, shall fail to qualify as a senior citizen housing development because it was not originally developed or put to use for occupancy by senior citizens. (51.3(b)(4))

Under California law, all the units in a dwelling must be designated for seniors rather than 80 percent of units under the FHA/HOPA. State law also allows a senior to live with someone 45 years of age or older that is their spouse, domestic partner, or person providing primary physical or economic support to the senior. The senior may also live with a disabled child or grandchild or disabled spouse/partner who must permanently reside in the household due to a disability. (Fair Housing Law Exemptions for Senior Housing, Community Housing Law, Sustainable Economies Law Center)

AB-686 Housing Discrimination: Affirmatively Furthering Fair Housing

The Fair Housing Act includes a requirement that the federal government work to dismantle segregation and to create equal housing opportunities or “affirmatively further fair housing.” (AFFH) This law applies to all state and local governments that receive federal funding from HUD.

There is currently debate at the national level about the interpretation of affirmatively furthering fair housing within the Fair Housing Act. To establish control over how this law is interpreted and enforced

at the state level, California's Assembly Bill 686 (AB-686) was signed into law in 2018 and codifies California's commitment to "affirmatively further fair housing." The law defines the term "affirmatively furthering fair housing" as taking meaningful actions that "overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity," and requires all public agencies working within housing and community development to affirmatively further fair housing.

Existing law requires the housing element to include an inventory of land suitable and available for development, and requires that inventory be used to identify sites that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels.

The new law requires the state, cities, counties, and public housing authorities to administer their programs and activities related to housing and community development in a way that affirmatively furthers fair housing. The law prohibits these authorities from taking actions inconsistent with their AFFH obligation and requires that the AFFH obligation be interpreted consistent with HUD's 2015 regulation, regardless of federal action regarding the regulation. To ensure AFFH obligations are incorporated into local housing decisions, AFFH analysis must be added to the housing element for plans that are due beginning in 2021. This includes an examination of issues such as segregation and resident displacement and identification of fair housing goals.

Other California Laws

Other state laws governing housing discrimination within California are:

Unruh Civil Rights Act: Provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation.

Ralph Civil Rights Act (California Civil Code Section 51.7): Forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. "Violence" under this law can take the form of verbal or written threats, physical assault or attempted assault, graffiti, vandalism, or property damage.

Bane Civil Rights Act (California Civil Code Section 52.1): Protects all people in California from interference by force, or threat of force, with an individual's constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crime, though convictions under the act are not allowed for speech alone unless that speech itself threatened violence. The rights protected under the Bane Act include the rights of association, assembly, due process, education, employment, equal protection, expression, holding of public office, housing, privacy, speech, travel, use of public facilities, voting, worship, and protection from bodily harm.

California Civil Code Section 1940.3: Prohibits landlords from questioning potential residents about their immigration or citizenship status. In most states, landlords are free to inquire about a potential tenant's immigration status and to reject applicants who are in the United States illegally. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person's citizenship or immigration status.

Government Code Sections 11135, 65008, and 65580-65589.8: Prohibit discrimination in programs funded by the State and in any land-use decisions.

Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities (SB 520)
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2)
- Housing for extremely low-income households, including single-room occupancy (SRO) units (AB 2634)
- Housing for persons with developmental disabilities (SB 812)

Local Law(s)

No local laws within Stanislaus Urban County, Turlock, or Modesto expand either protected classes or housing covered under the FEHA.

The Stanislaus County Housing Authority does not expand the definition of protected classes or housing covered under the FEHA but is required to follow additional housing regulations as directed by HUD.

AI Development Process

The development of the AI includes an analysis of laws, regulations, housing conditions, public policies, banking and mortgage data, as well as demographic and community characteristics. Paired with this analysis is feedback from the public through survey responses, public meetings, and phone consultations. Because the AI is developed in conjunction with Consolidated Plans, citizen participation requirements for the Consolidated Plans were often combined with feedback on fair housing issues.

Community Meetings

Community meetings were held in Modesto, Turlock, Stanislaus Urban County, and the Stanislaus County Housing Authority. The meetings were an opportunity for the public to learn about fair housing laws and share their issues and concerns regarding fair housing in the community. Meetings included the following:

Stanislaus Urban County: Meetings were held at Municipal Advisory Councils (MACs), advisory bodies of residents that exist to represent the local community to the Board of Supervisors. Meetings were also held with the Stanislaus Community System of Care and Stanislaus Homeless Alliance to talk about issues facing homeless individuals throughout the County.

Modesto: Meetings were ninety (90) minutes and covered both Consolidated Plan and AI topics. Modesto's community meetings were held in different aldermanic districts to ensure the variety of housing conditions and community opinions were captured.

Stanislaus County Housing Authority: Discussed fair housing and housing access issues at the Board of Commissioners Meeting.

Turlock: Held a meeting with the Turlock Community Collaborative, a network of public service agencies, businesses, and individuals in Turlock interested in improving the quality of life. The collaborative meets regularly to address needs in the community.

Meetings were held on the following dates and locations:

Modesto

- District 1 – October 29, 2019 @ Fire House #6
- District 2 – November 1, 2019 @ West Modesto King Kennedy Center
- District 2 – November 7, 2019 @ The Center Church
- District 3 – October 29, 2019 @ Trinity United Presbyterian Church
- District 4 – November 6, 2019 @ Airport Neighborhood Center
- District 5 – October 30, 2019 @ Veteran's Resource Center
- District 6 – November 12, 2019 @ St. Joseph's Catholic Church
- Public Hearing – April 16, 2020 @ Tenth Street Place
- Public Hearing – May 12, 2020 @ Modesto City Council

Stanislaus Urban County

- Salida MAC Meeting- October 22, 2019
- Empire MAC Meeting- October 23, 2019
- Knights Ferry MAC Meeting- October 24, 2019
- Denair MAC Meeting- November 5, 2019
- South Modesto MAC Meeting- November 14, 2019
- Stanislaus Community System of Care (CSOC) Meeting- January 16, 2020
- Stanislaus Homeless Alliance (SHA) Meeting- February 12, 2020
- City of Ceres City Council- Public Hearing- April 13, 2020
- City of Hughson City Council- Public Hearing- April 27, 2020
- City of Newman City Council- Public Hearing- April 28, 2020
- City of Oakdale City Council- Public Hearing- May 4, 2020
- City of Patterson City Council- Public Hearing- May 5, 2020
- City of Riverbank City Council- Public Hearing- April 28, 2020
- City of Waterford City Council- Public Hearing- May 7, 2020

Stanislaus County Housing Authority

- Board of Commissioners Meeting- TBD
- Stanislaus County Board of Supervisors- Public Hearing – May 12, 2020

Turlock

- Meeting-Turlock Community Collaborative February 18, 2020
- City of Turlock City Council Public Hearing- May 12, 2020

DEMOGRAPHIC AND HOUSING MARKET ANALYSIS

Population Trends

Stanislaus County is currently home to about 531,000 residents, 39 percent of whom live in the City of Modesto, 21 percent in unincorporated areas, and 13 percent in the City of Turlock. The rest live in smaller cities and unincorporated communities throughout the County. Most of Stanislaus County is sparsely populated, with less than 200 people per Census Block. By comparison, some areas of Modesto and Turlock have over 1,000 people per Block. (See Map X)

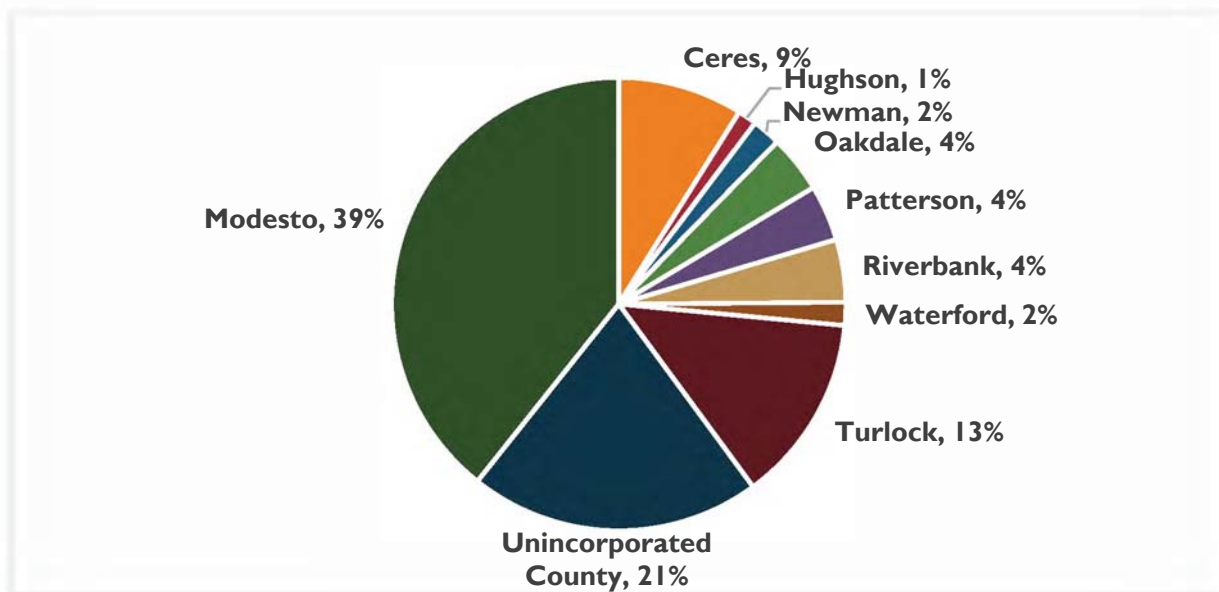
The County's population was born primarily in the United States, with 79 percent born in the County and 66 percent born in the State of California. Twenty percent of County residents were born in a foreign country.

Table 1. Stanislaus County Population by Municipality

Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Waterford	Turlock	Stanislaus Urban County	Unincorporated County	Modesto
47,231	7,160	10,808	21,796	21,205	23,761	8,708	71,166	250,883	110,214	208,512

Source: 2012-2016 ACS

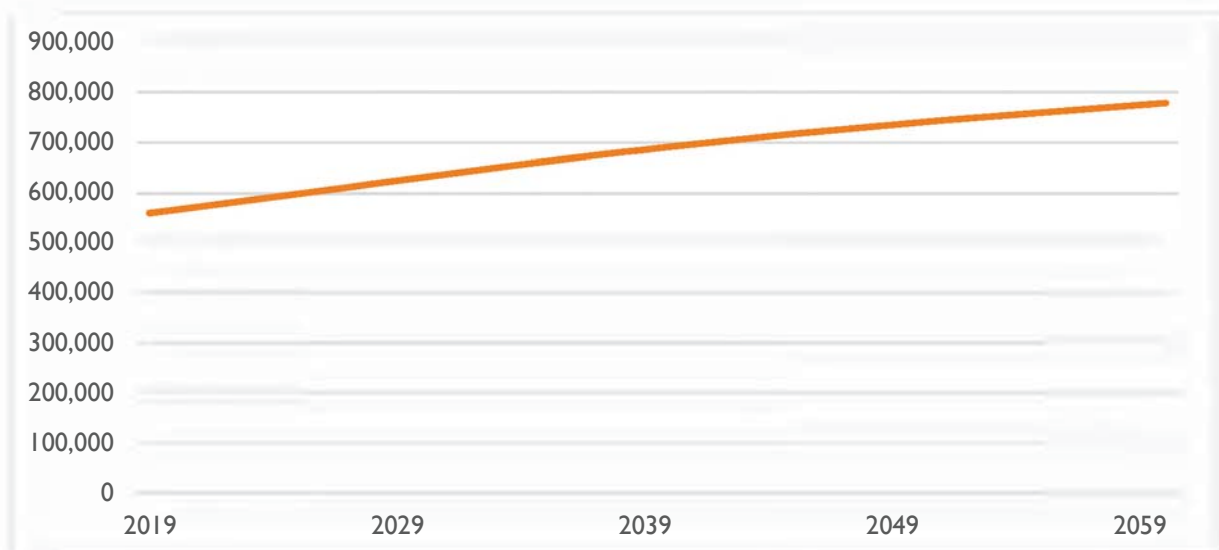
Chart 1. Population Share by Municipality in Stanislaus County



Source: 2012-2016 ACS

In the next 40 years, the Stanislaus County population is projected to grow to about 800,000 residents, a 37 percent increase. Most incorporated areas in the County are expected to grow by about 1 percent annually. The City of Patterson is anticipated to grow the most of all the incorporated areas. According to projections, Patterson will increase from containing 4 percent of the County's population to 6 percent of the population by 2060. (California Department of Finance)

Chart 2. Population Projections 2020-2060 in Stanislaus County



Source: Total Estimated and Projected Population for California and Counties, Demographic Research Unit, California Department of Finance, May 2019

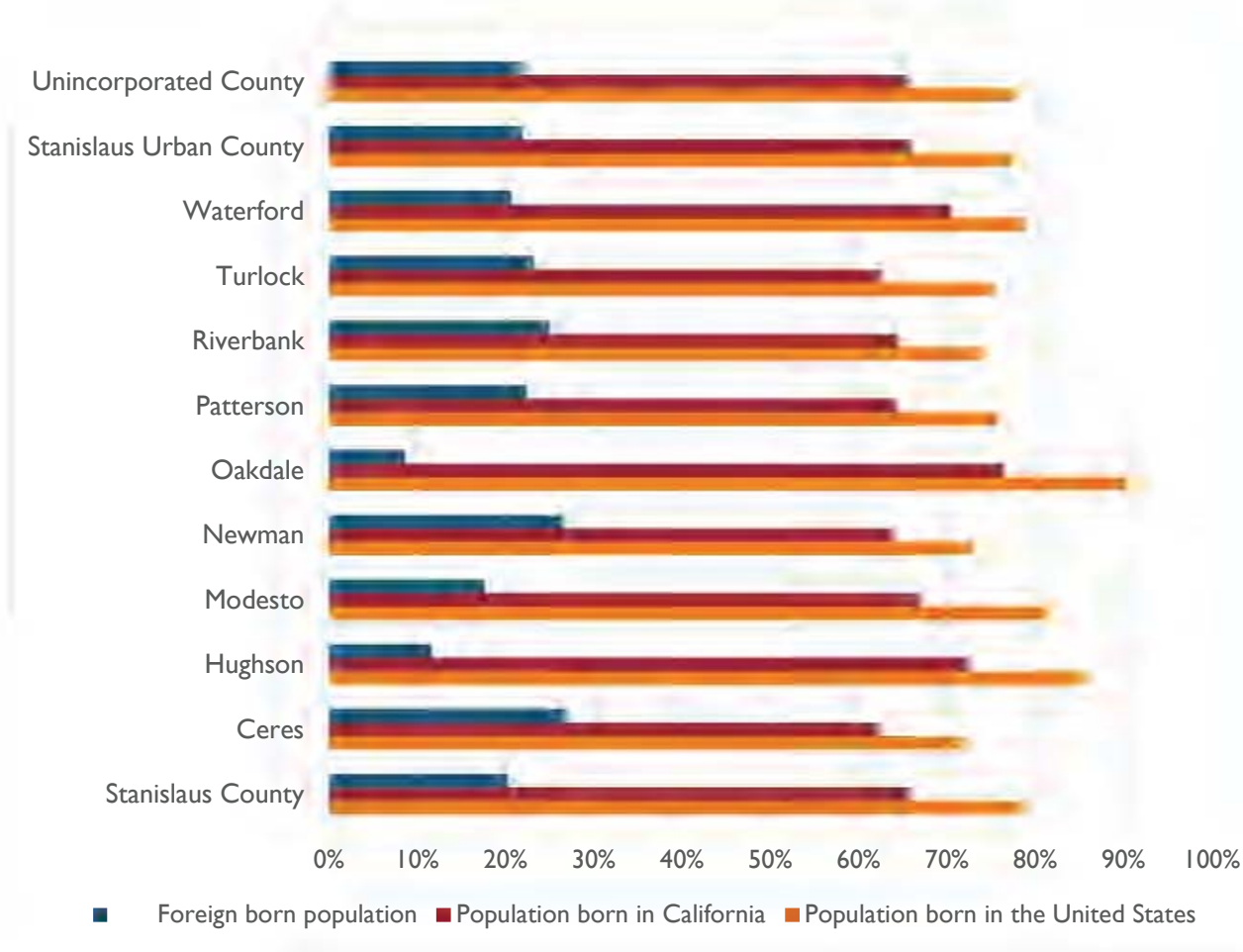
Race/ Ethnicity

Since 1980, the racial and ethnic makeup of the County has changed significantly and the County has become more diverse. For example, the County was 80 percent non-Hispanic White and 15 percent Hispanic or Latino (of any race) in the 1980 U.S. Decennial Census and by 2010, these figures were 47 percent and 42 percent, respectively. In addition, Asian residents grew from 1.4 to 6.7 percent of the population during the same timeframe, and non-Hispanic Black/ African American residents grew from 1.1 to 3.2 percent of the population.

The County's Hispanic or Latino population generally lives outside of Modesto and Turlock, a reflection of the population's connection to the local agricultural industry. (Map X)

In the next 40 years, Asian and Hispanic or Latino populations are expected to increase by the highest percentages compared to current population numbers. During this time period, the Asian population in Stanislaus County is expected to increase more than 150 percent, adding about 40,000 residents, and the Hispanic population by 100 percent, adding 214,000 residents. (Stanislaus County Forecast Summary, Eberhardt School of Business and Policy Research, 2016)

Chart 3. Place of Birth by Municipality



Source: 2012-2016 ACS

The Cities of Ceres, Riverbank, and Newman have the highest percentage of residents who were born in another country, while Hughson, Oakdale, and Waterford have the highest percentage of current residents who were born in California.

Chart 4. Population Race and Ethnicity in Stanislaus County, 1980

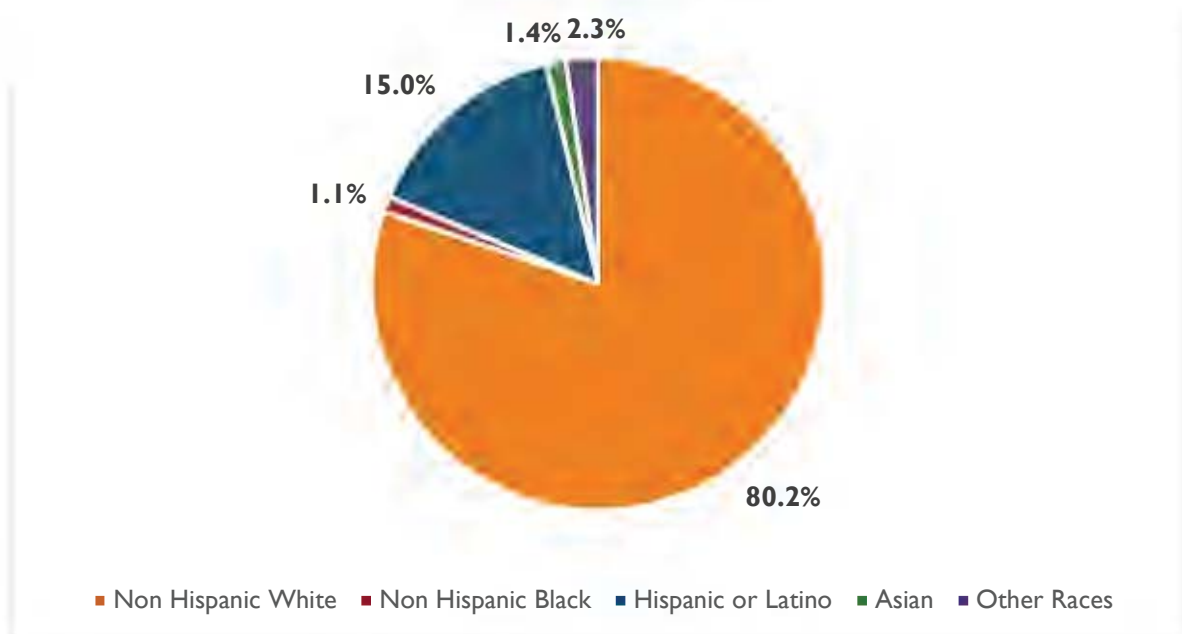
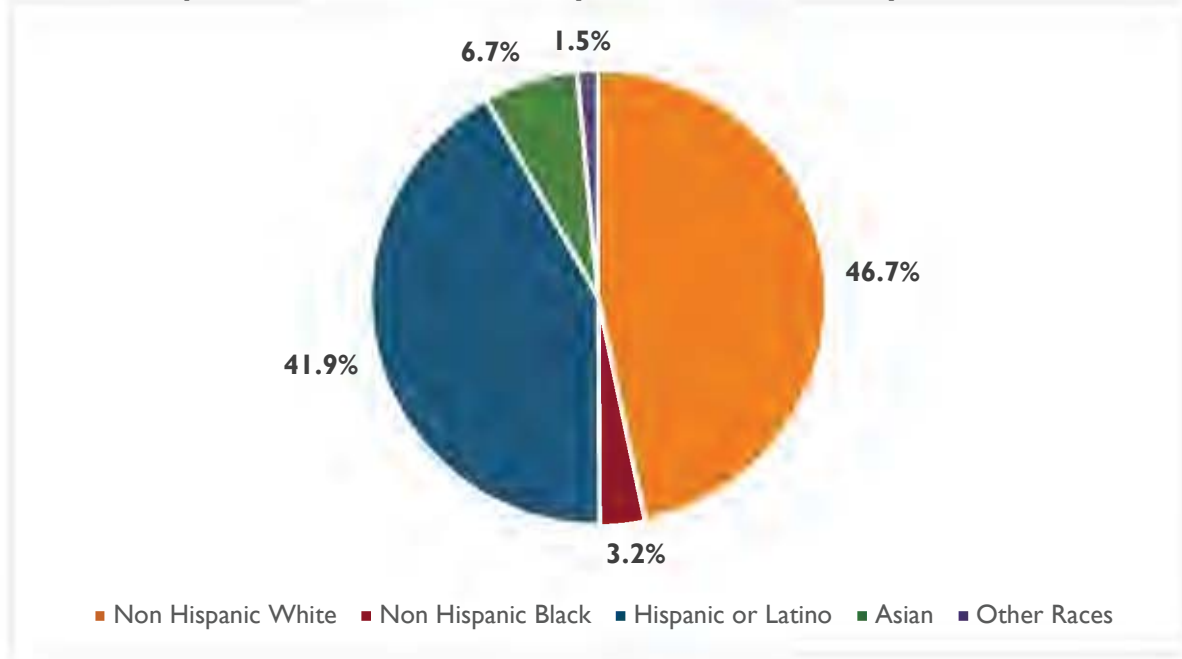


Chart 5. Population Race and Ethnicity in Stanislaus County, 2010



Source: 1980, 2010 Decennial U.S. Census

Language

The primary language spoken at home by residents over five years old varies by jurisdiction. Figure 6 indicates that English is the most prevalent language among residents of Hughson, Modesto, Oakdale, Patterson, Turlock, Waterford, and the Unincorporated County. In other communities such as Ceres, Newman, and Riverbank, the majority of residents prefer to speak a language other than English within their household.

Though many people who speak a language other than English at home are bilingual, there are also residents who report speaking English “less than very well”. More than 20 percent of residents in Waterford, Newman, Ceres, and the Unincorporated County report speaking English less than “very well”. While Spanish is the predominant language of these residents, Ceres, Turlock, and the Unincorporated County also have at least 5 percent of residents who speak another language and speak English less than “very well”.

Communication with residents in these areas needs to be particularly aware of the language needs of some residents. Figure 7 presents the share of the population who speak English “less than very well” by language and jurisdiction. English language education services may also be needed to help non-English-speaking residents enter the workforce or increase opportunities for higher earnings.

Chart 6. Language Spoken at Home by Jurisdiction

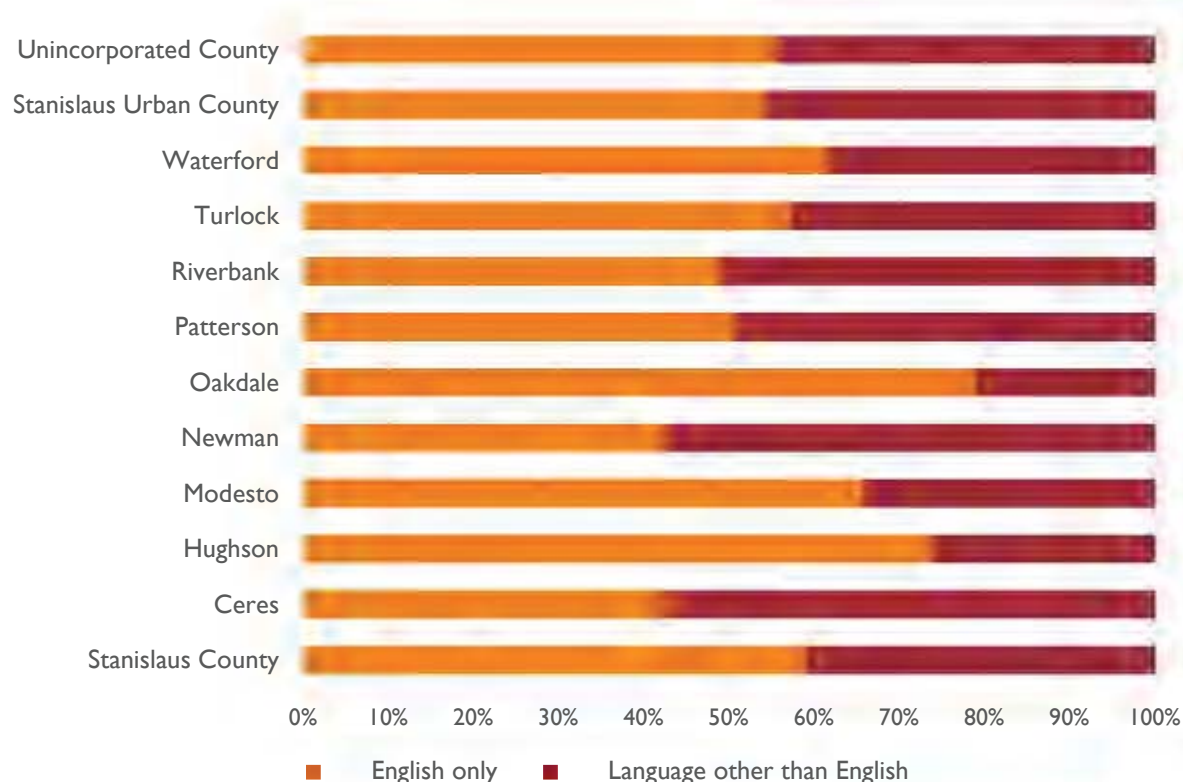
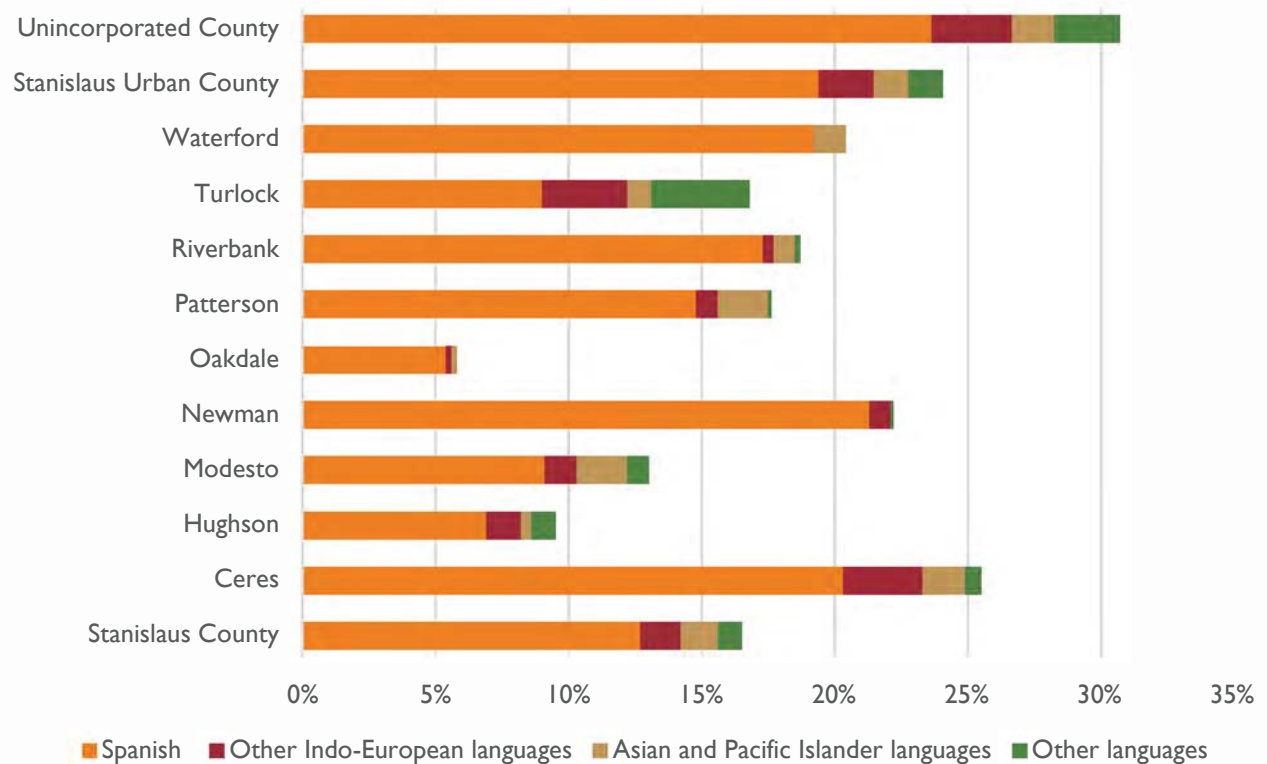


Chart 7. Population That Speaks English Less Than “Very Well” by Language and Jurisdiction.



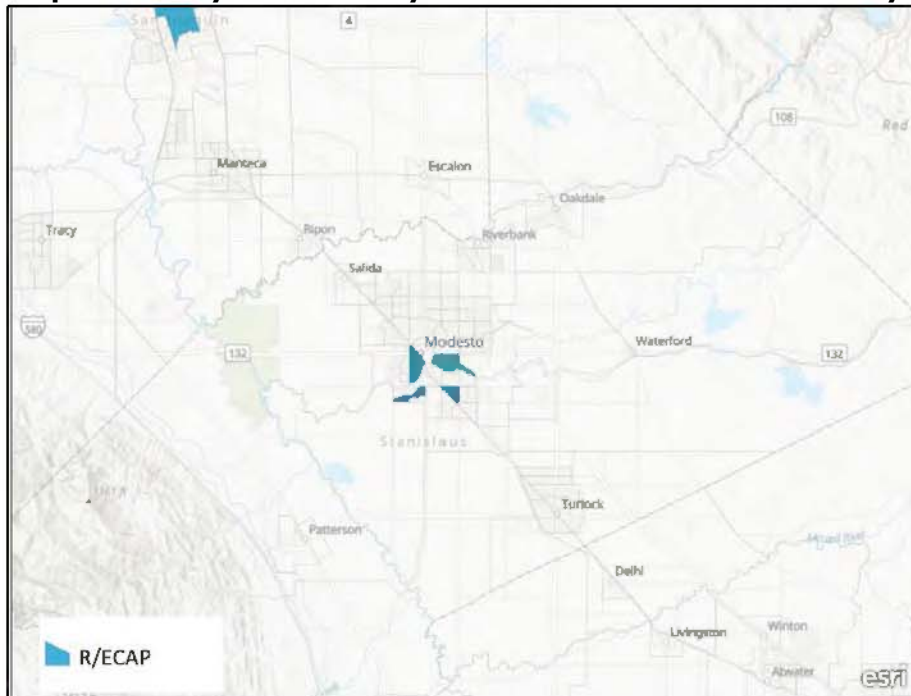
Source: 2012-2016 ACS

Racial/Ethnic Concentrations

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) is a designation by HUD to measure areas where both race or ethnicity and poverty overlap. Such areas could be a sign of unequal housing opportunity on a population scale. A census tract can be designated as a R/ECAP when more than half the population is non-White and either 40 percent or more of the population is in poverty, or, the tract's poverty rate is greater than three times the average poverty rate in the area.

Within Stanislaus County, there are five census tracts considered R/ECAPs all within the area of the Cities of Modesto and Ceres. Figure 8 presents two maps depicting these areas.

Map 1. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)



Source: Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) HUD-eGIS Open Data
<http://hudgis-hud.opendata.arcgis.com/> ACS 2009-2013

Map 2. Racially or Ethnically Concentrated Areas of Poverty (Zoomed)



Source: Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) HUD-eGIS Open Data
<http://hudgis-hud.opendata.arcgis.com/> ACS 2009-2013

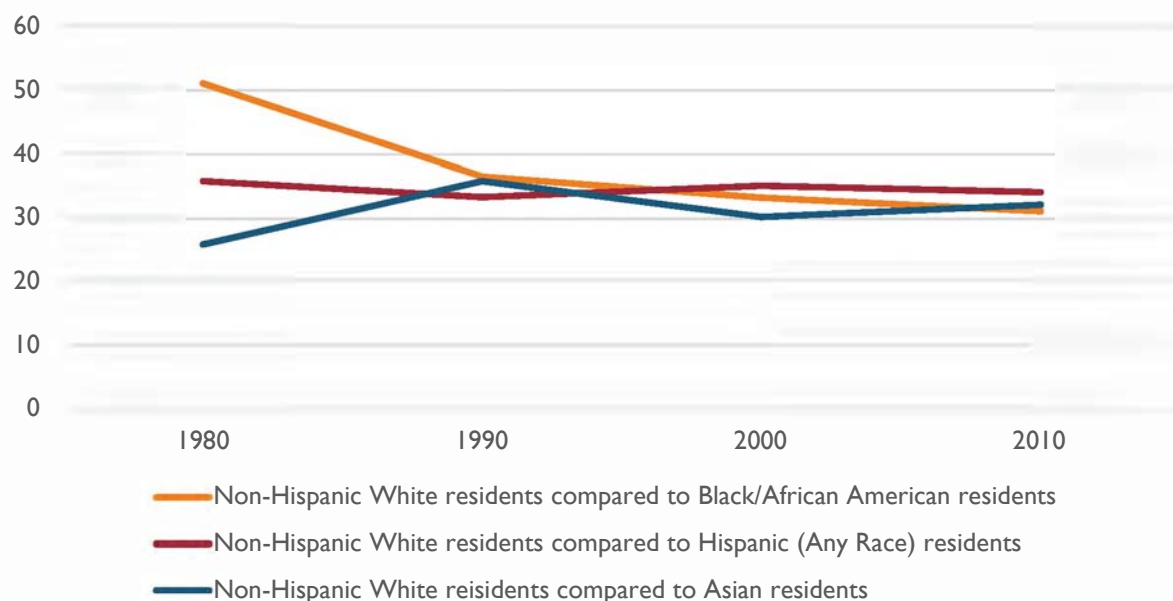
Dissimilarity Index

The “Dissimilarity Index” is a measure of whether members of one group are located evenly across census tracts. The value of this index ranges between 0 and 100, with low values indicating a low amount of segregation and high values indicating a high amount of segregation. The exact value represents the percentage of people who would need to move census tracts for the groups to be evenly distributed within the County. For example, if the County’s dissimilarity index for White residents compared to Black/African American residents was 40, this would mean that 40 percent of Black/African American residents would need to move into other census tracts to make the White and Black/African American populations evenly distributed within the County. Note that when looking at race or ethnic Dissimilarity Index values, the values only account for the location of residents rather than those of incomes, housing, or neighborhood quality.

The Dissimilarity Index for Stanislaus County for non-Hispanic White residents compared to Black/African American residents shows that these residents have become more integrated within Stanislaus County between 1980 and 2010.

The Dissimilarity Index between Non-Hispanic White and Hispanic or Latino residents stayed constant within Stanislaus County between 1980 and 2010, indicating the increase in the Hispanic or Latino population has been proportional across the County. In other words, compared to the 1980 distribution by ethnicity, integration between non-Hispanic White residents and Hispanic or Latino residents in the County has not changed over time.

Chart 8. Dissimilarity Index: Stanislaus County



Source: Diversity and Disparities, American Communities Project, Brown University, Modesto MSA

Entropy Index

A related calculation of diversity is an “entropy index”, which measures the spatial distribution of race in a given area. The more clustered together a single racial group is, the less diverse that area is under this metric. If the group is distributed evenly throughout the County, then the area is considered more diverse. Between 1990 and 2016, Stanislaus county became more diverse under this measure, supporting the interpretation of the Dissimilarity Index.

Map 3. Entropy Index, 1990



Map 4. Entropy Index, 2016



Source: Washington Post: How integrated is your city? Diversity mapping tool. Published May 2, 2018.

Age and Disability

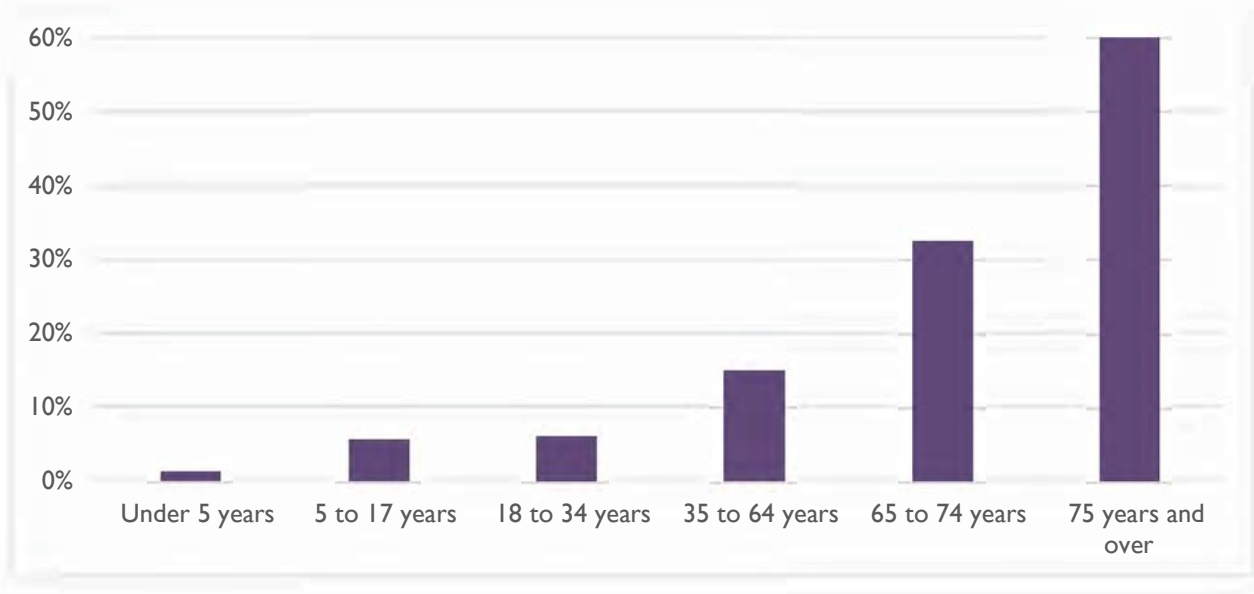
In Stanislaus County, about 44 percent of residents over age 65 report having some sort of disability. For individuals age 75 and over, this figure increases to 60 percent. Figure 12 depicts the share of the County population with a disability by age bracket. In comparison, Figure 13 presents the projected population growth by age in Stanislaus County. Between 2020 and 2040, the State of California Department of Finance anticipates the largest population growth in Stanislaus County for residents in two age brackets: those ages 30-48 and those over the age of 70.

In areas with a high number of seniors, there may be need for specific services and disability accommodations (changing a rule or policy for a person based on disability) and modifications (changing a physical structure for a person based on disability).

Disability accommodations and modifications may be needed in any number of venues like rental and homeowner housing, government service counters, community centers, and walkways. Services in demand for with disabilities include meal programs, home care and medical services, transportation, and other social services. Subsidies to provide these services to low- and moderate-income residents are

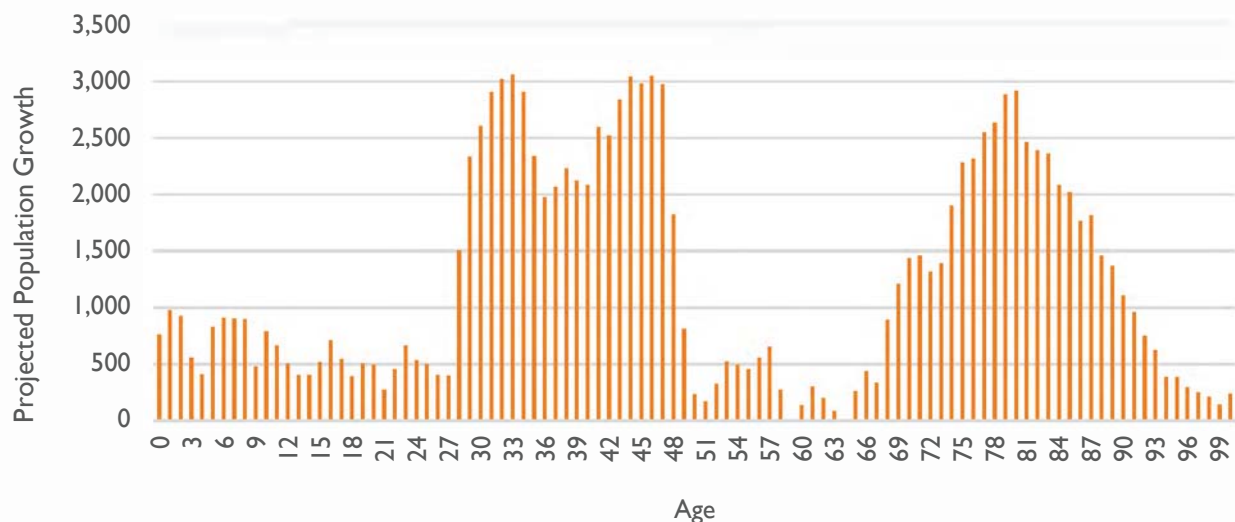
particularly needed in these areas. Between 2020 and 2040, the State of California Department of Finance anticipates population growth in Stanislaus County among two age categories: those 30 to 48 and those over the age of 70. (Chart 9)

Chart 9. Population with a Disability by Age in Stanislaus County



Source: 2012-2016 ACS 5-Year Average

Chart 10. Projected Population Change by Age 2020-2040



Source: State of California Department of Finance County Population Projections (2010-2060); County Population by Age (1-year increments) Baseline 2016

Income Trends

Disability and Income

About 9 percent of the County's population reports having a disability. Figure 14 presents the distribution of annual earnings for residents in Stanislaus County by disability status. The median annual earnings for a person with a disability is \$24,404 in Stanislaus County. Without a disability, median annual earnings are \$29,816, a difference of more than five thousand dollars annually. Likewise, of the population with a disability in the County, 21.4 percent are under the federal poverty level compared to just 14.1 percent of people without a disability.

The income discrepancy is most likely due to the fact that the majority of the Stanislaus County population with a disability and over age 16 are not in the labor force (Table 2).

Table 2. Total Population and Population with a Disability in Labor Force in Stanislaus County

	Total Population	Population with a Disability
Employed	54.6%	19.7%
Not in Labor Force	38.2%	75.4%

Source: 2013-2017 ACS

Chart 11. Disability Status by Annual Income Brackets in Stanislaus County

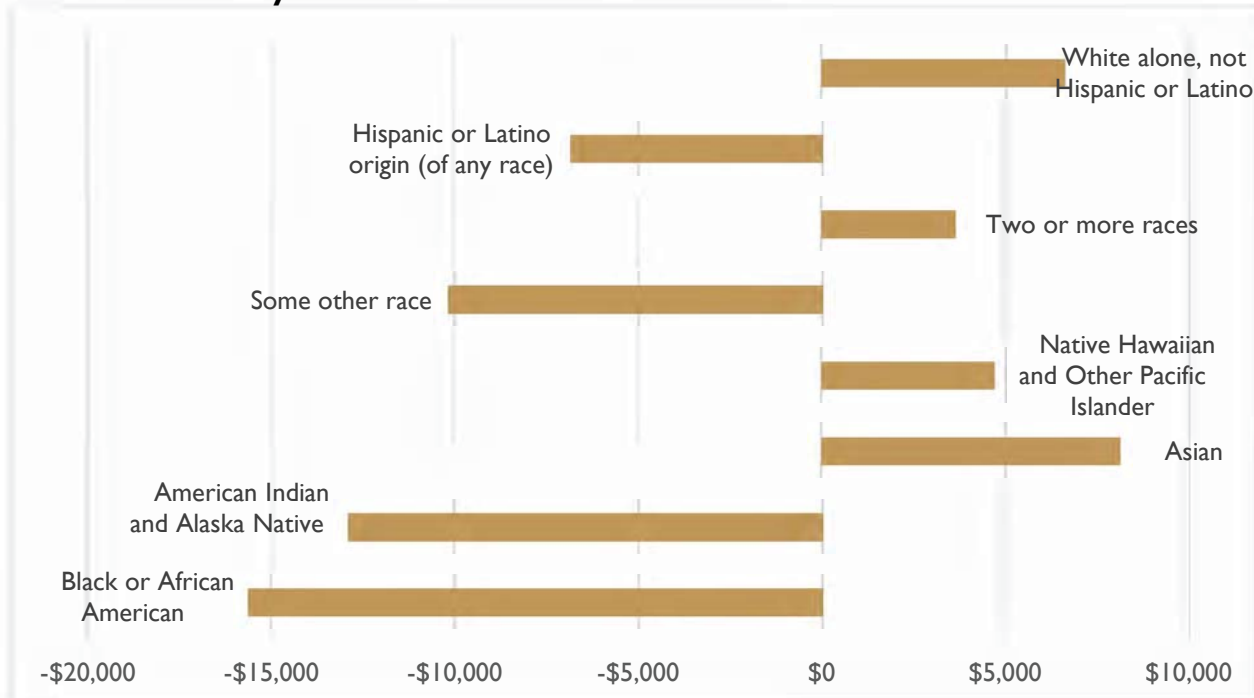


Source: 2013-2017 ACS

Race/Ethnicity and Income

The median household income in Stanislaus County is \$54,260, which varies by over \$15,000 per year depending on household race and ethnicity. Non-Hispanic White and Asian households earn more than \$5,000 per year above the County median income, while Hispanic or Latino, American Indian and Alaska Native, Black/ African American, and people of another race make \$5,000 to \$15,000 less annually per household.

Chart 12. Difference in Annual Median Income from County Median Income by Race and Ethnicity



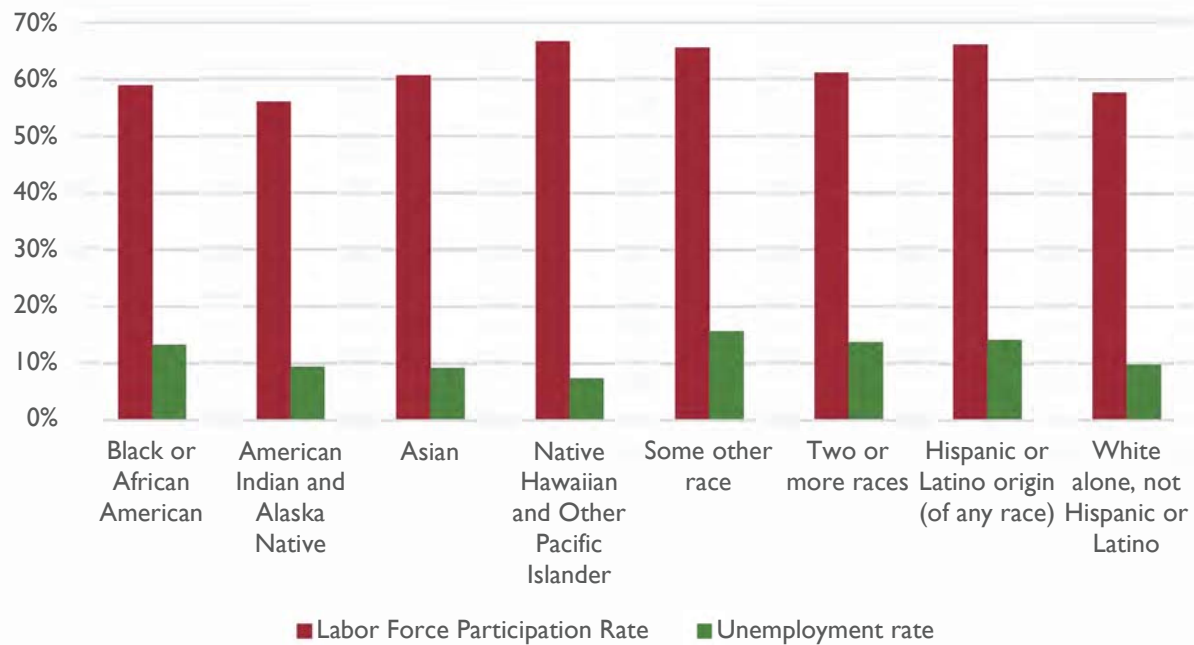
Source: 2013-2017 ACS

Employment Trends

Employment by Race/Ethnicity

Participation in the labor force as well as unemployment vary by race and ethnicity. There could be several reasons for this including historic differences in access to education, participation in industries which have undergone significant change, and different sized populations of retired individuals in each racial or ethnic group. Chart 13 depicts the share of individuals participating in the labor force and are unemployed by race and/or ethnicity.

Chart 13. Labor Force Participation and Unemployment by Race and Ethnicity

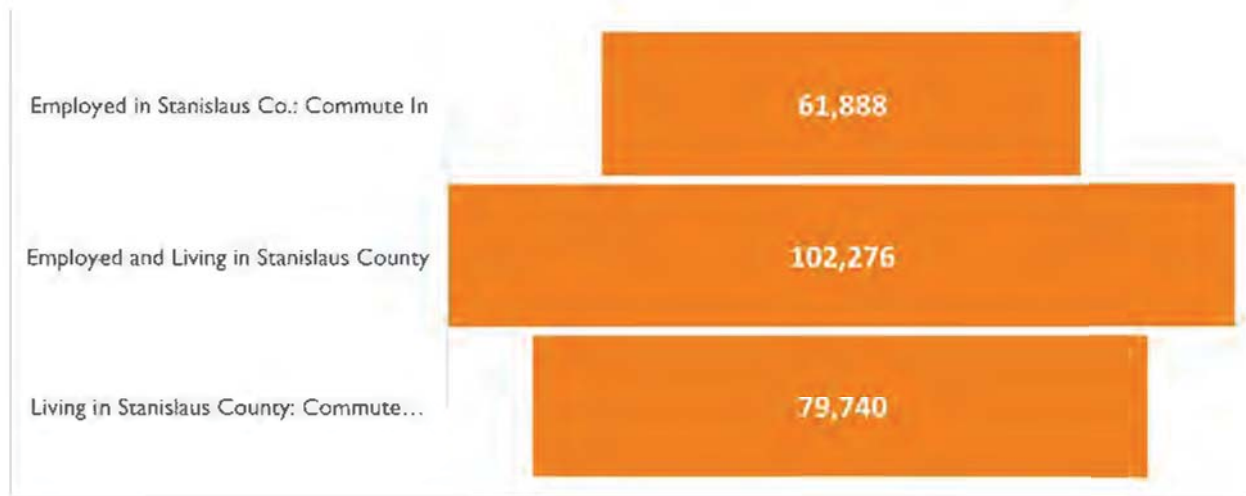


Source: 2013-2017 ACS

Commuting Time/Type

Countywide, more people both work and live in Stanislaus County (42 percent) than commute outside the County for work (33 percent). In comparison, a significant number of residents in both Turlock and Modesto commute outside the City for work. Access to and methods of transportation for employment can therefore be a determinant in an individual's ability to access and maintain various jobs. Charts 14, 15, and 16 depict the number of residents in Stanislaus County, Modesto, and Turlock who commute within or outside of the County for work.

Chart 14. Primary Job Inflow/Outflow: Stanislaus County



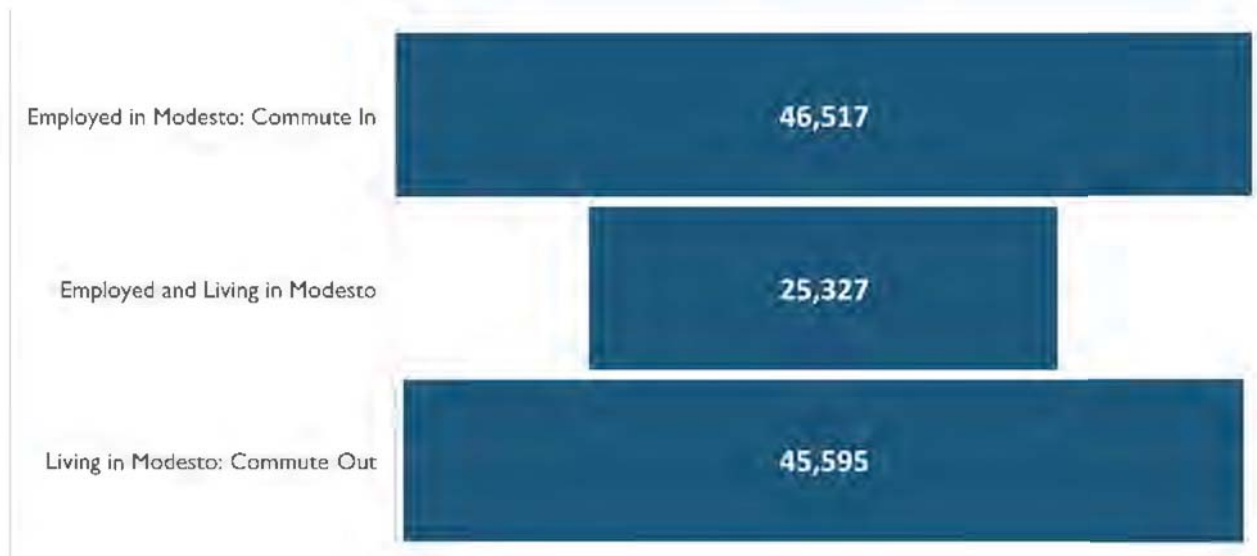
Source: U.S. Census OnTheMap

Chart 15. Primary Job Inflow/Outflow: City of Turlock



Source: U.S. Census OnTheMap

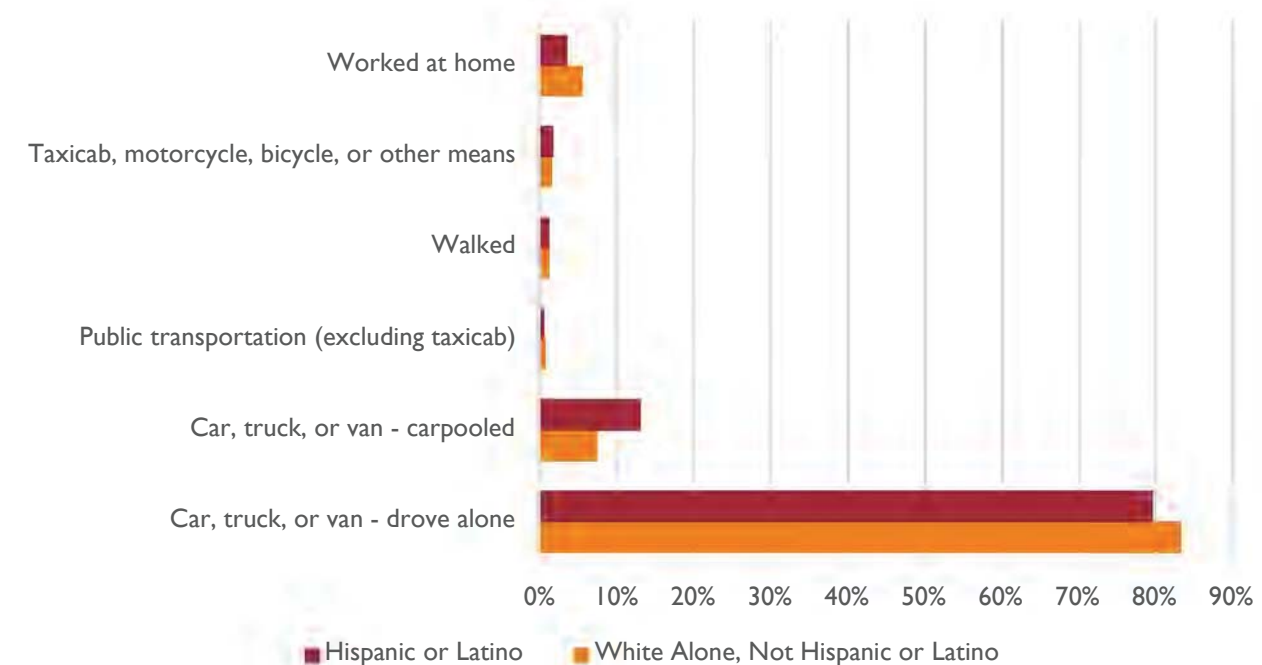
Chart 16. Primary Job Inflow/Outflow: City of Modesto



Source: U.S. Census OnTheMap

Chart 17 presents the different forms of transportation residents use to get to work for White Non-Hispanic and Hispanic/Latino residents. The chart indicates that there are slight differences in the commuting method between White, non-Hispanic residents and Hispanic or Latino residents in Stanislaus County. More Hispanic or Latino residents commute to work by shared car, truck, or van (carpooled) than White non-Hispanic residents, while more White non-Hispanic residents either drove alone or worked at home.

Chart 17. Means of Transportation to Work by Race and Ethnicity



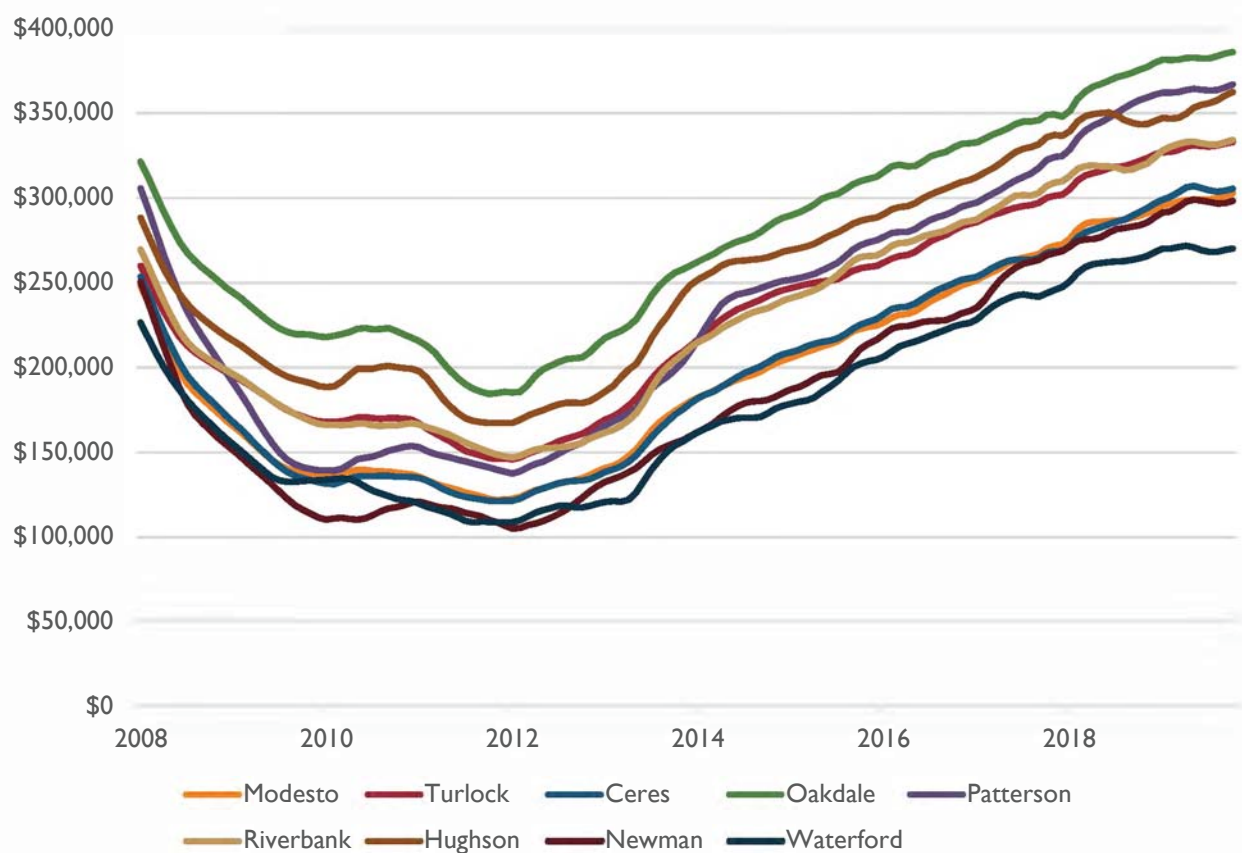
Source: 2013-2017 ACS 5-Year Estimates

Housing Trends

Homeowner housing (both single-family homes and condos) values have increased steadily across Stanislaus County since 2012. The highest values are in Oakdale, with a typical housing unit worth \$368,000 in 2019. The lowest value for a typical house in 2019 is in Waterford, about \$270,000.

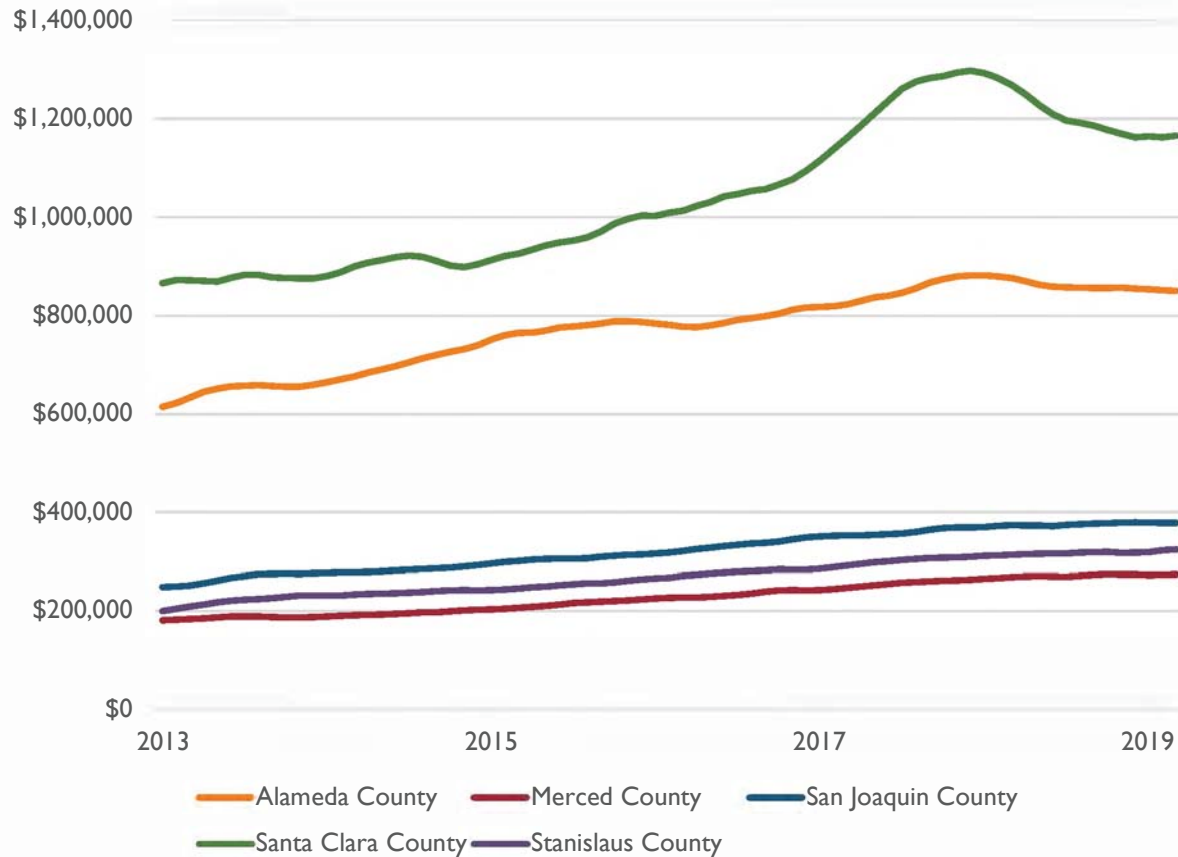
Regionally, homeowner housing values in counties surrounding Stanislaus County are divided between the Bay Area (Alameda, Santa Clara Counties) and those inland (Merced, Stanislaus, and San Joaquin Counties). Chart 18 presents typical home values for jurisdictions within Stanislaus County. In comparison, Chart 19 depicts the typical housing value in Stanislaus County and surrounding counties.

Chart 18. Typical Home Value (Zillow Home Value Index)



ZHVI All Homes (Single-Family Rental, Condo/Coop) Time Series

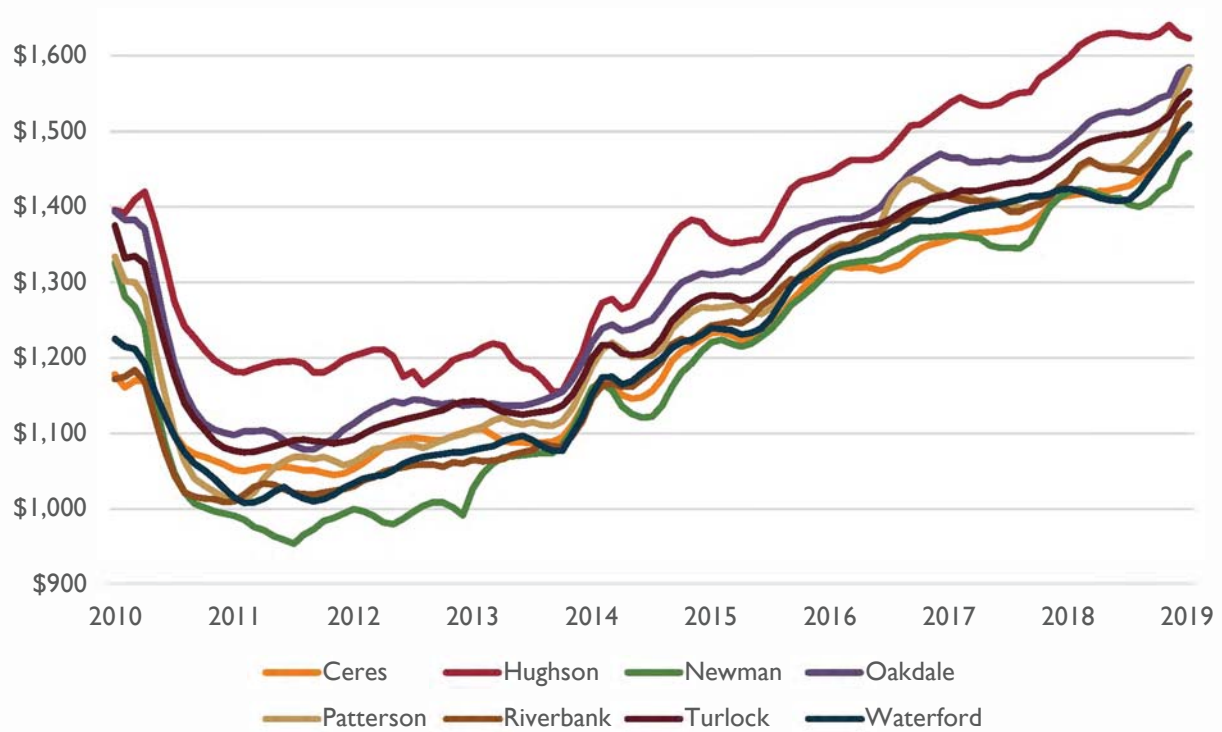
Chart 19. Typical Home Value in Regional Counties (Zillow Home Value Index)



Source: Zillow data: ZHVI All Homes (Single-Family Rental, Condo/Coop) Time Series

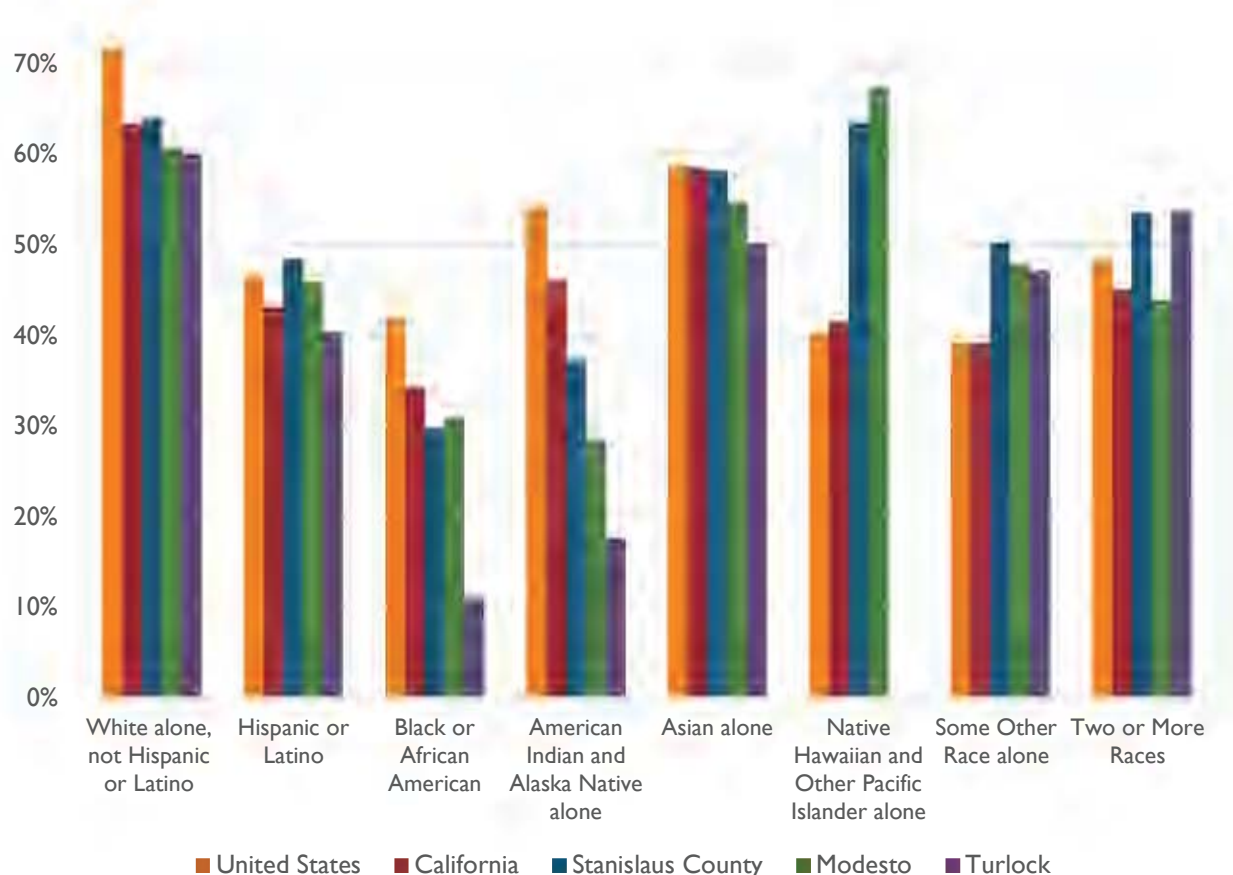
Chart 20 depicts the change in typical rental housing prices by jurisdiction in Stanislaus County. The figure indicates that rental housing prices have increased in all Stanislaus County municipalities, with the highest typical rental price in Hughson (\$1,623) and the lowest in Newman (\$1,471) as of 2019.

Chart 20. Typical Housing Rental Price (Zillow Rent Index)



Source: Zillow Data: ZRI Time Series

Chart 21. Homeownership Rate by Race and Ethnicity



Source: 2013-2017 ACS 5-Year Estimate

Chart 21 presents homeownership rates by race and ethnicity for residents of Stanislaus County, Turlock, and Modesto as well as California and the United States. For most race and/or ethnicities depicted, homeownership rates for the County and Entitlement Communities more closely resemble those for California than the United States. In addition, for some race/ethnic groups, homeownerships rates for Stanislaus County, Modesto, and Turlock are well above or below average. For instance, the homeownership rate for Black/African American residents in Turlock is 10.9 percent whereas the rate for Modesto is 30.8 percent, 29.7 percent for Stanislaus County, 34.2 percent for California, and 41.9 percent for the United States. This may be because of a small sample size or population of Black/African American residents in Turlock.

Access to Opportunity

Transportation

Transportation is a component in equal access to neighborhoods, employment, healthcare, and other services for those who cannot or choose not to drive a car due to factors like disability, financial constraints, or legal barriers. Most transportation in Stanislaus County is through personal vehicles, though public transportation exists as a regional bus system, city bus systems, ADA paratransit services (Dial-a-Ride), and interstate train system.

Stanislaus County has numerous public transportation and alternative transportation methods, particularly for seniors or those with mobility disabilities. Less than 10 percent of all workers commute using a shared vehicle or public transportation, however, partly due to the lack of transit options during non-traditional business hours.

Bus Systems

Stanislaus Regional Transit (StaRT) serves Stanislaus County with eight bus routes that travel throughout the County. All bus stops are shown on Map X

Ceres Area Transit (CAT) serves Ceres and the surrounding unincorporated area.

Modesto Area Express (MAX) offers bus service throughout the Modesto urban area with 21 routes.

Turlock Transit provides transit service with six routes within the City of Turlock.

Ride Services

Ceres Dial-A-Ride (CDAR) is a curb-to-curb demand service for use only by people with disabilities that prevents them from riding the CAT Scheduled Fix Route Bus System. CDAR is presently operated by Storer Transit Systems, Inc., under contract with the City of Ceres.

Modesto Area Dial-A-Ride (MADAR) is provided by the City of Modesto as a transportation service for persons with disabilities, and people 65 and older.

Stanislaus Regional Transit (StaRT) Dial-A-Ride is a pre-scheduled cur-to-curb service within the County. Dial-A-Ride is available in the following communities:

Newman Dial-A-Ride Newman, Crows Landing, Gustine

Oakdale Dial-A-Ride Oakdale

Patterson Dial-A-Ride Patterson, Westley, Grayson

Riverbank Dial-A-Ride Riverbank, Eastside

Stanislaus Regional Transit (StaRT) Shuttles is a curb-to-curb transportation service open to the general public between cities in the County. The following shuttles operate within the County:

Waterford/Modesto Shuttle: Modesto, Empire, Oakdale, Waterford, Hickman, Hughson, Ceres

Eastside Shuttle: Modesto, Oakdale, Riverbank

Turlock/Modesto Shuttle: Modesto, Keyes, Turlock, Denair

Stanislaus Regional Transit (StaRT) ADA Paratransit service is available to individuals with disabilities which prevent them from using fixed-route buses. The service is provided within a 3/4-mile radius of a StaRT Fixed Route bus and is a direct origin-to-destination shared-ride transit service.

Stanislaus Regional Transit (StaRT) Medivan takes pre-scheduled passengers from Modesto to non-emergency appointments at Bay Area Medical Centers Monday through Thursday.

BRIDGES Volunteer Driver Program provides reimbursement to individuals with a disability or senior citizens who are unable to drive or use public transit. Eligible participants select a volunteer driver

who is able to drive them to destinations. Participants receive \$0.50 per mile to reimburse the volunteer driver.

Veterans Van Volunteer Driver Program (VetsVan) is a service through a partnership between the Stanislaus County Area Agency on Aging and the Veterans Service Office (VSO) that helps veterans get to medical appointments. VetsVan serves homebound veterans and occasionally those who are not able to take other forms of transportation due to a medical condition. Rides are provided by volunteer drivers and can take veterans to regional Veterans Affairs (VA) locations.

Turlock Transit Dial-a-Ride provides paratransit service to eligible individuals. Within a specified zone in Turlock, the service is available only to persons who have received ADA paratransit eligibility, those 65 years of age and over, Medicare card holders, or elementary school students. In other Turlock-area zones, the service is open to everyone.

Regional Rail

Amtrak stations on the San Joaquins regional line are located near Modesto and Turlock. The San Joaquins line runs to Bakersfield southbound and Oakland or Sacramento northbound. The San Joaquin Joint Powers Authority, of which StanCOG is a member, operates the line.

The Modesto Amtrak station was built in 1999 and has ADA Accessible bathrooms, waiting room, water fountain, ticket office, and platform. Denair Station near Turlock is an unstaffed Amtrak station. The train platform is ADA Accessible.

Altamont Commuter Express (ACE) is a commuter train used by residents of Stanislaus County. It runs between Stockton and San Jose and stops in the Bay Area.

Connecting Services

Modesto Area Express (MAX) offers commuter services to ACE, Amtrak, and Bay Area Rapid Transit (BART).

StaRT Commuter is a bus that transports commuters from Turlock and Patterson to the Dublin/Pleasanton BART station.

California Vanpool Authority (CalVans) CalVans operates as a Public Transit Agency that operates two programs: the Farmworker Vanpool Program and the General Public Vanpool program. CalVans supplies volunteer drivers with vans to drive themselves and others to work or school and pays for the gas, maintenance, repairs, and insurance.

Transportation Planning

StanCOG The Stanislaus Council of Governments (StanCOG) is the Metropolitan Planning Organization (MPO) for the Stanislaus Region tasked with, among other things, creation of the Regional Transportation Plan (RTP). The RTP is a 25-year plan that describes future needs and goals for all local transportation systems including roadways, transit, bicycle/pedestrian improvements and aviation. The last RTP published was the *2018 Regional Transportation Plan/Sustainable Communities Strategy (RTP/ SCS)*.

Non-Motorized Transportation Plan The *2013 Non-Motorized Transportation Master Plan*, details bicycle and pedestrian transportation in the County and is being updated in 2020. One stated goal of the

plan update is to “develop a non-motorized transportation network that focuses on equity and inclusivity to address the region’s unique needs.”

MOVE The California Social Services Transportation Improvement Act was passed in 1979 and allowed and suggested that each California county create a Consolidated Transportation Services Agency to coordinate the transportation needs of seniors, people with disabilities, and others with lowered mobility or special transportation needs. In 2010, StanCOG established the Consolidated Transportation Services Agency (CTSA) of the Stanislaus Region, now called “MOVE”. MOVE works to reduce gaps in the region’s public transit systems, assists other human services agencies with transportation technical assistance, and provides mobility training (“travel training”).

Measure L In 2016, a one-half cent sales tax was approved by Stanislaus County voters (“Measure L”), to fund transportation in the County. Over the measure’s lifetime of 25 years, 65 percent of the revenue will be used for local projects, \$48 million for bicycle and pedestrian network improvements, and \$20 million for need-based transportation services for seniors, veterans, and disabled residents. In all, Measure L is expected to collect \$960 million dollars.

General Plan The “Circulation Element” of the Stanislaus County General Plan addresses transportation issues from a land-use perspective. It encourages land use that supports public transit and other transportation modes.

Transit Discrimination and Housing Choice Issues

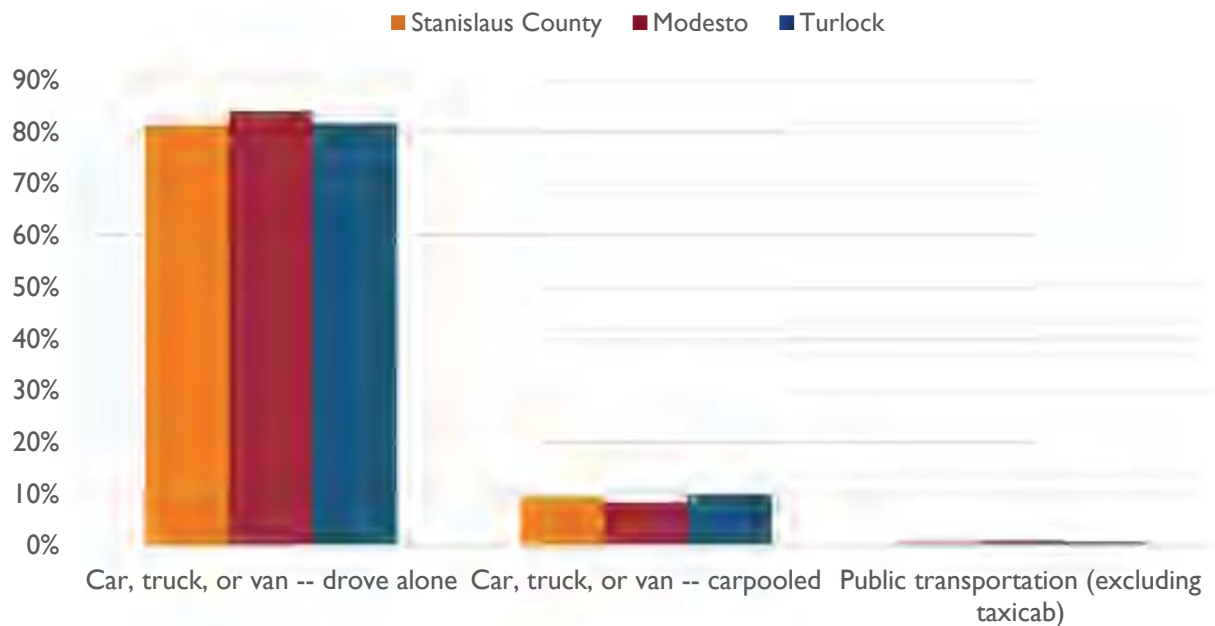
Title VI of the Civil Rights Act of 1964 protects the right to not be excluded from participation in, or denied the benefits of, public transportation services on the basis of race, color, or national origin. People who believe that they have experienced discrimination or have been denied rights may file a complaint with California’s Department of Fair Employment and Housing (DFEH) or with the Federal Transit Administration.

Public Transit Use

Chart 22 depicts the share of commuters in Stanislaus County by the method of transportation to work. The figure indicates that a very small percentage of workers in Stanislaus County take public transportation to commute to work. Only 0.7 percent, or 7 out of every 1,000 workers, take public transportation countywide. In Modesto, the largest city in the County, 0.9 percent take public transportation to work. Using a personal vehicle (whether alone or part of a rideshare/carpool) to travel to work takes far less time than taking public transportation in Stanislaus County. People driving alone to work take an average of 22 minutes, and people who share rides take an average of 26 minutes. Those who take public transportation take 47 minutes, more than double the time driving a vehicle alone. (Chart 23)

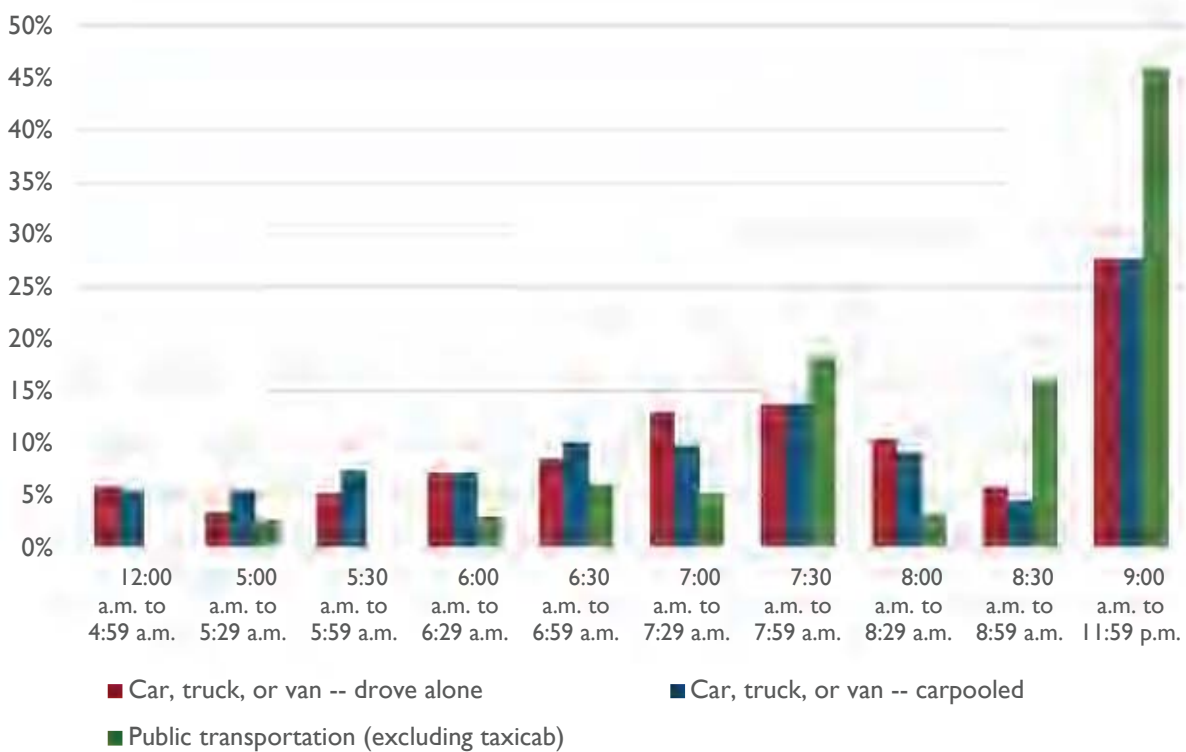
For those who do take public transportation, Chart 23 indicates that the majority begin work during traditional first-shift or “office” hours after 8:30 am. Almost no workers who begin work between midnight and 6:00 am use public transportation but rely on their own vehicle or a rideshare/carpool. A higher percentage of people who drive to work start working between midnight and 8:30 am.

Chart 22. Commuting Method of Workers Over 16 in Stanislaus County



Source: 2013-2017 ACS 5-Year Estimates; Table S0804

Chart 23. Arrival Time to Work in Stanislaus County



Source: 2013-2017 ACS 5-Year Estimates; Table S0804

Schools

Education outcomes are correlated with housing and neighborhood choice because success in education drives an individual's ability to participate in the labor force, occupation, and wage prospects. The collective educational success in an area is a factor in the local economy, average wages and overall housing and neighborhood quality. If educational outcomes are not equal among members of specific groups, the local economy and housing and neighborhood quality will be impacted.

Likewise, housing discrimination segregates some children into distressed neighborhoods and high-poverty, low-quality schools. Specific housing and neighborhood policies can help students' education outcomes by investing in current struggling neighborhoods where children already are and by enabling families to live in communities with higher-quality schools. While increasing educational outcomes is complex and both individual education intervention for students and work stabilizing neighborhood safety and quality are needed, HUD has found the effects of increased neighborhood stability (and home environment) to be a larger factor in increasing educational outcomes. (Breaking Down Barriers: Housing, Neighborhoods, and Schools of Opportunity, HUD Office of Policy Development and Research)

Within Stanislaus County, there are 25 individual school districts and about 115,000 students between kindergarten and 12th grade. Around 110,000 are enrolled in public schools and 5,000 in private schools. Among public school students in the County, 60 percent are Hispanic or Latino, 26 percent are non-Hispanic White, 4 percent are Asian, and the remaining are Black/ African American or Two or More Races. Twenty four percent of all students are learning English, slightly higher than 19 percent in California. Sixty-nine percent of students qualify for free and reduced-price meals based on household income. (Stanislaus County Office of Education Annual Report to the Community 2019)

Chart 24 presents the share of students by race and ethnicity in Stanislaus County. Over 60 percent of students in Stanislaus County schools are Hispanic or Latino, about 26 percent are non-Hispanic White, and the rest are another race, though the demographics of students varies widely geographically. In Ceres, Newman-Crows Landing, and Riverbank School Districts, more than 75 percent of students are Hispanic or Latino. More than 50 percent of students are non-Hispanic White at Valley Home Joint Elementary, Gratton Elementary, Oakdale Joint Unified, Knights Ferry Elementary, Hickman Community Charter School, and Gratton Elementary. Only Stanislaus Union Elementary has more than 25 percent of students who are not Hispanic or Latino, or non-Hispanic White ("Other").

Graduation rates vary by student race, though not by large margins. Black/ African American students have the lowest graduation rate in the County at 74.4 percent and are also the most likely to be suspended. Filipino students have the highest graduation rate at 89.4 percent. (California Department of Education 2018-2019) These rates are both less than ten percentage points away from the countywide graduation rate of 83.9 percent. (Chart 27)

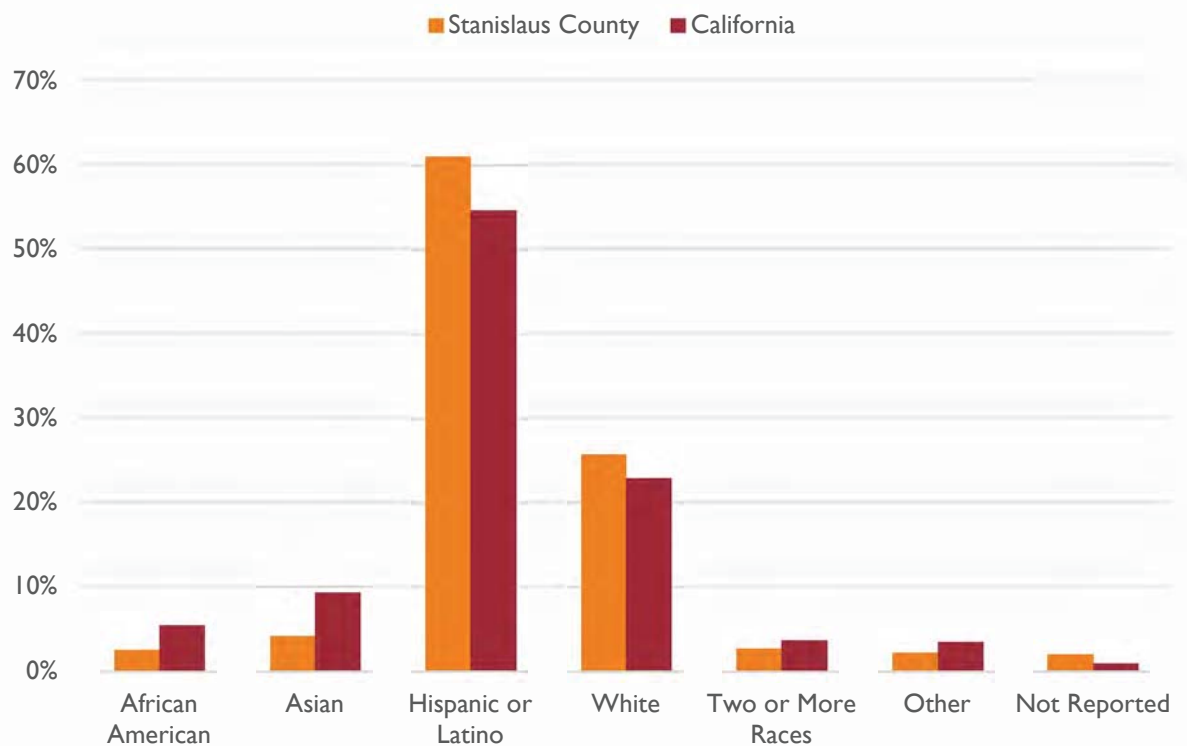
Students' ability to read, write, and speak English varies geographically as well. California students' English language ability is measured using the Initial English Language Proficiency Assessments of California (ELPAC). "English Only" (EO) students are native speakers of English with no additional language support needed. Initial Fluent English Proficient (IFEP) students need minimal language support, and "Reclassified Fluent English Proficient" (RFEP) are those students who, through learning English, are now at the IFEP level. "English Learners" need language education support to learn English for both social and academic use. (California Department of Education)

A number of schools and school districts have a large number of students who are English Learners, or not yet proficient at English for their grade level. Chart 26 indicates that Shiloh Elementary, Riverbank

Unified, Patterson Joint Unified, Paradise Elementary, Modesto City Elementary, Keyes Union, and Chatom Union all have more than a third of students who are considered English Learners.

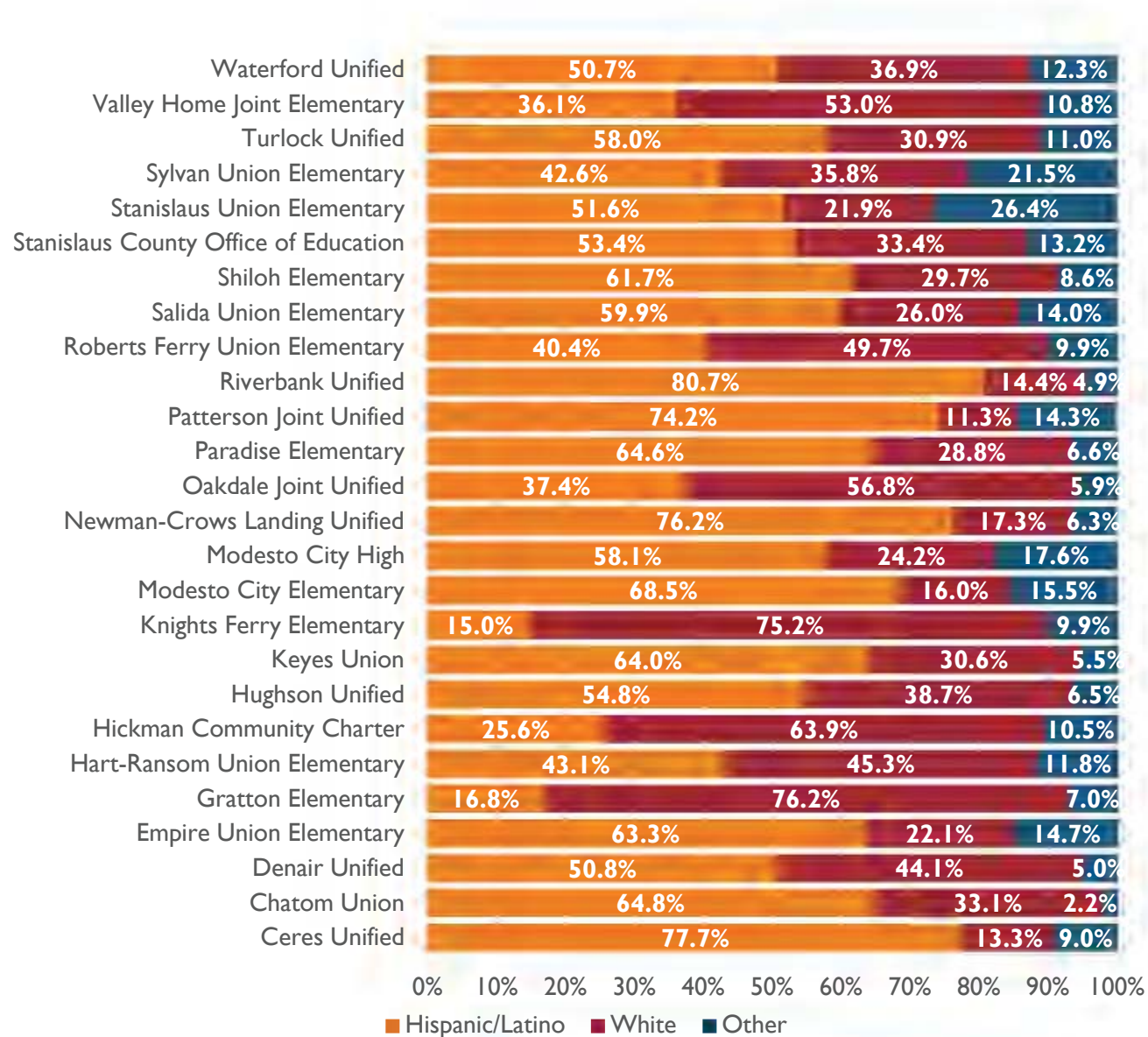
Students still in the process of becoming proficient in English have the significant hurdle of language in the way when competing academically with their peers, though many English Learners achieve the level of RFEP in time, particularly at Modesto City High where more than 31 percent of students achieved the level of RFEP after starting out as English Learners. Turlock Unified, Riverbank Unified, Patterson Joint Unified, Newman-Crows Landing Unified, Hughson Unified, and Ceres United School Districts all have at least 15 percent of students who have achieved the level of RFEP.

Chart 24. Share of Students by Race in Stanislaus County and California



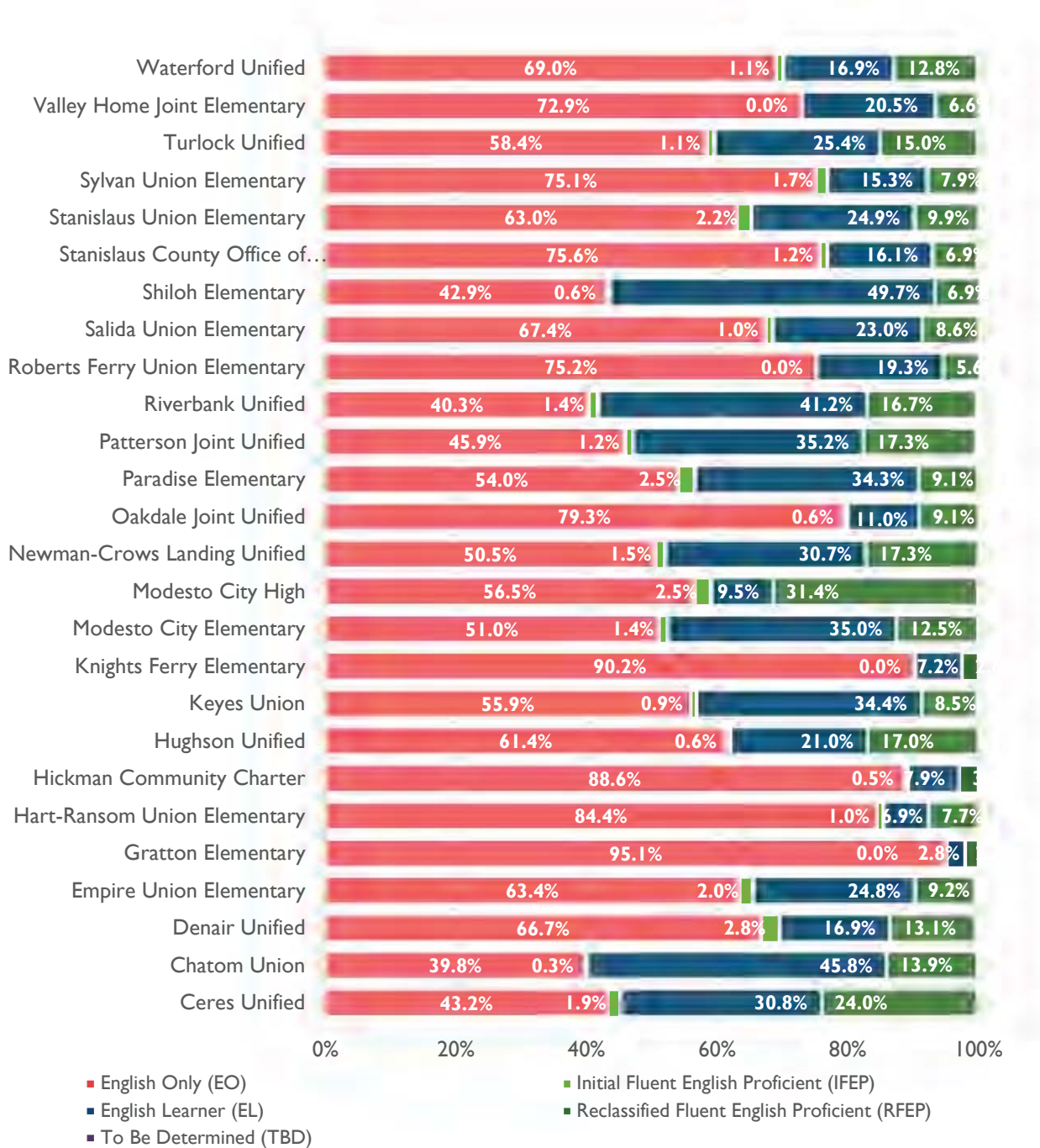
Source: California Department of Education 2018-2019

Chart 25. Share of Students by Race/Ethnicity and School District in Stanislaus County



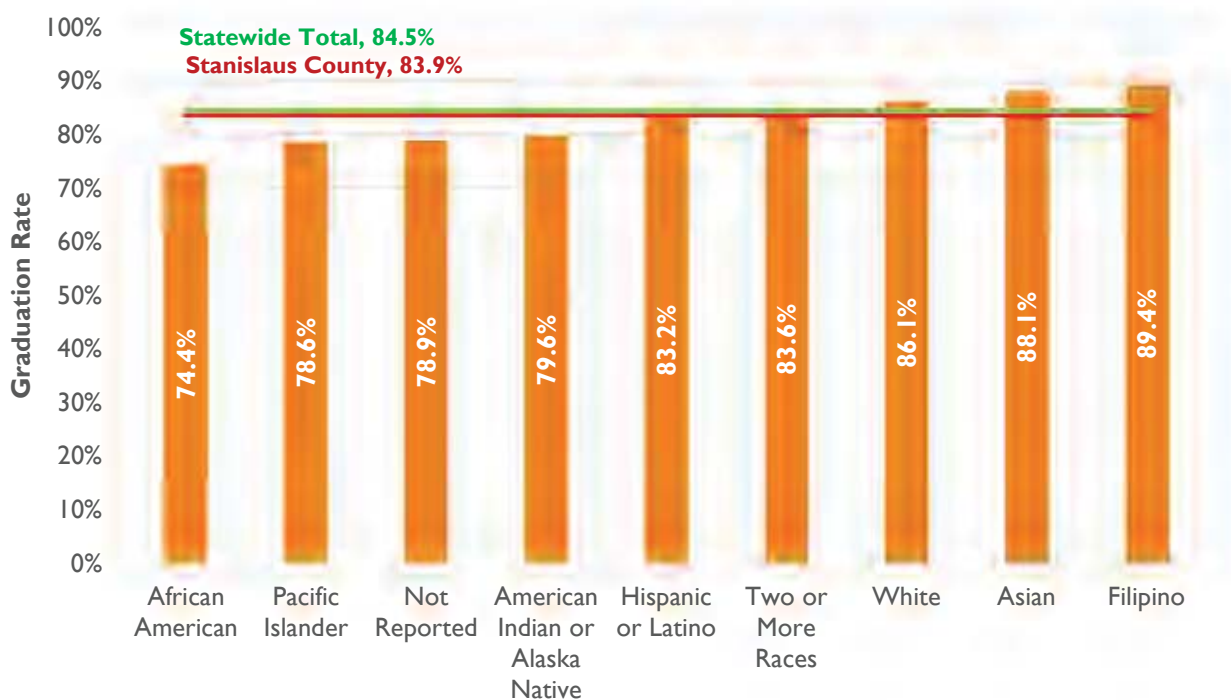
Source: California Department of Education 2018-2019

Chart 26. English Proficiency of Students by School or School District



Source: California Department of Education 2018-2019

Chart 27. Cohort Graduation Rates by Race in Stanislaus County

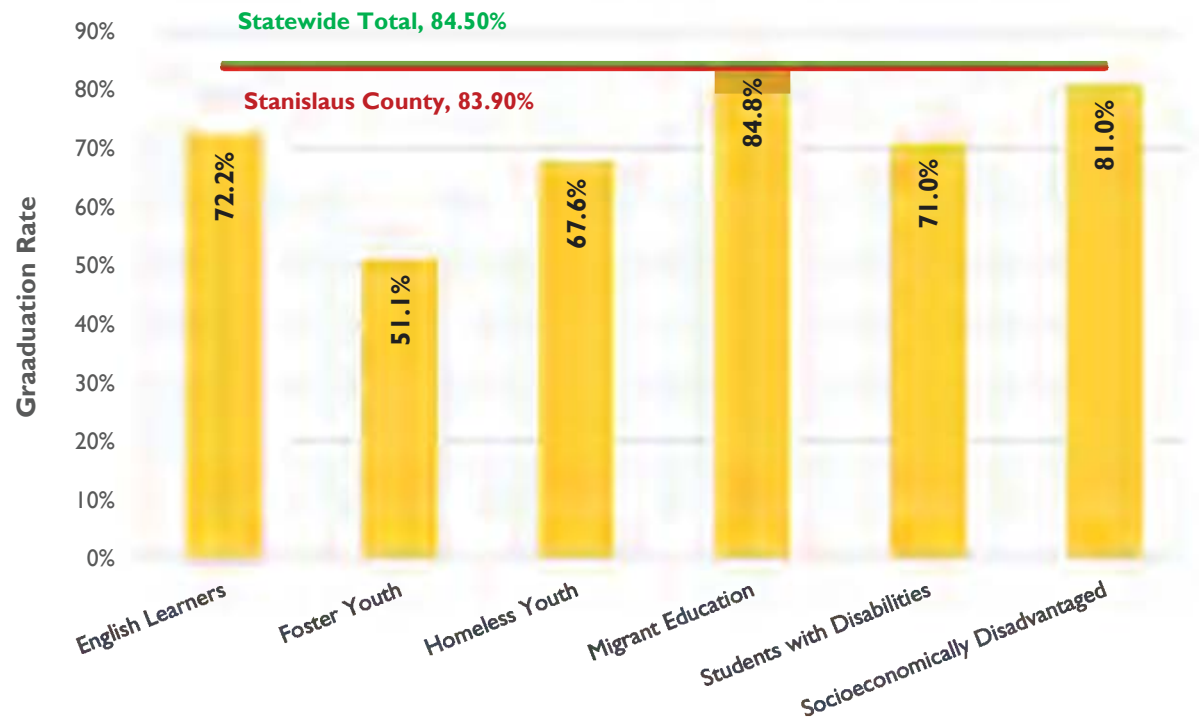


Source: California Department of Education 2018-2019 Four-Year Adjusted Cohort Graduation Rates

Other groups of students may also face academic challenges due to physical or social circumstances. In addition to English Learners, California also calculates the number of students who are “socioeconomically disadvantaged” (students eligible for free or reduced priced meals and/or have parents/guardians who did not receive a high school diploma), migrant, homeless, foster youth, and those with a disability. These students typically need additional resources to succeed and the number of students in these categories helps determine funding from the State. Data on graduation rates and suspensions can also help a school or school district gauge success in meeting these students’ needs.

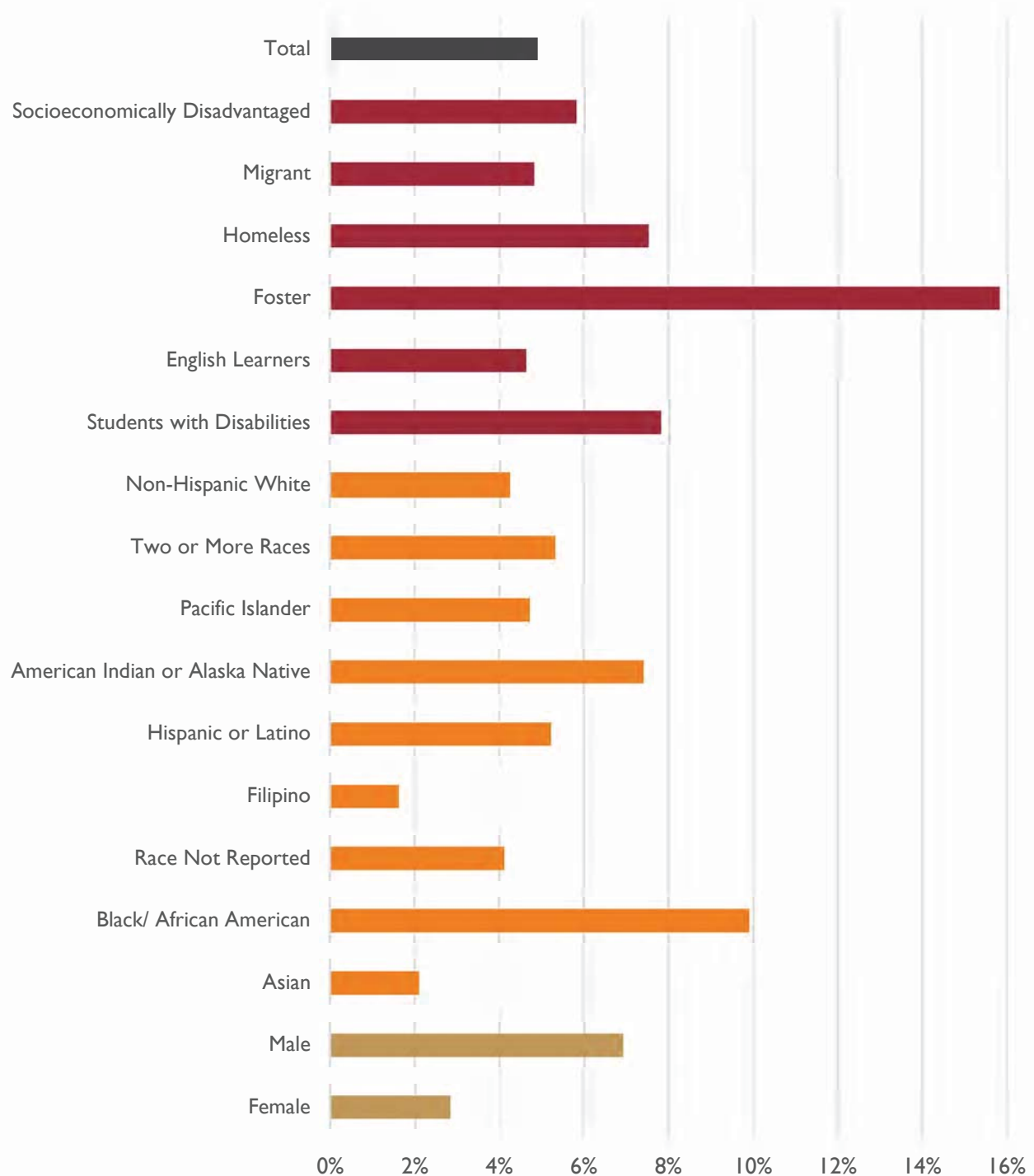
Charts 28, 29, and 30 indicate that in Stanislaus County, foster and homeless youth have the lowest graduation rates and highest school dropout rates. Roughly half of all foster youth in the County graduate. Foster students also have the highest suspension rate of all student groups, with high rates for homeless and disabled students as well. (California Department of Education 2018-2019) In addition, almost 85 percent of migrant students graduate and during the 2018-2019 school year had a graduation rate higher than the County average.

Chart 28. Cohort Graduation Rate Stanislaus County



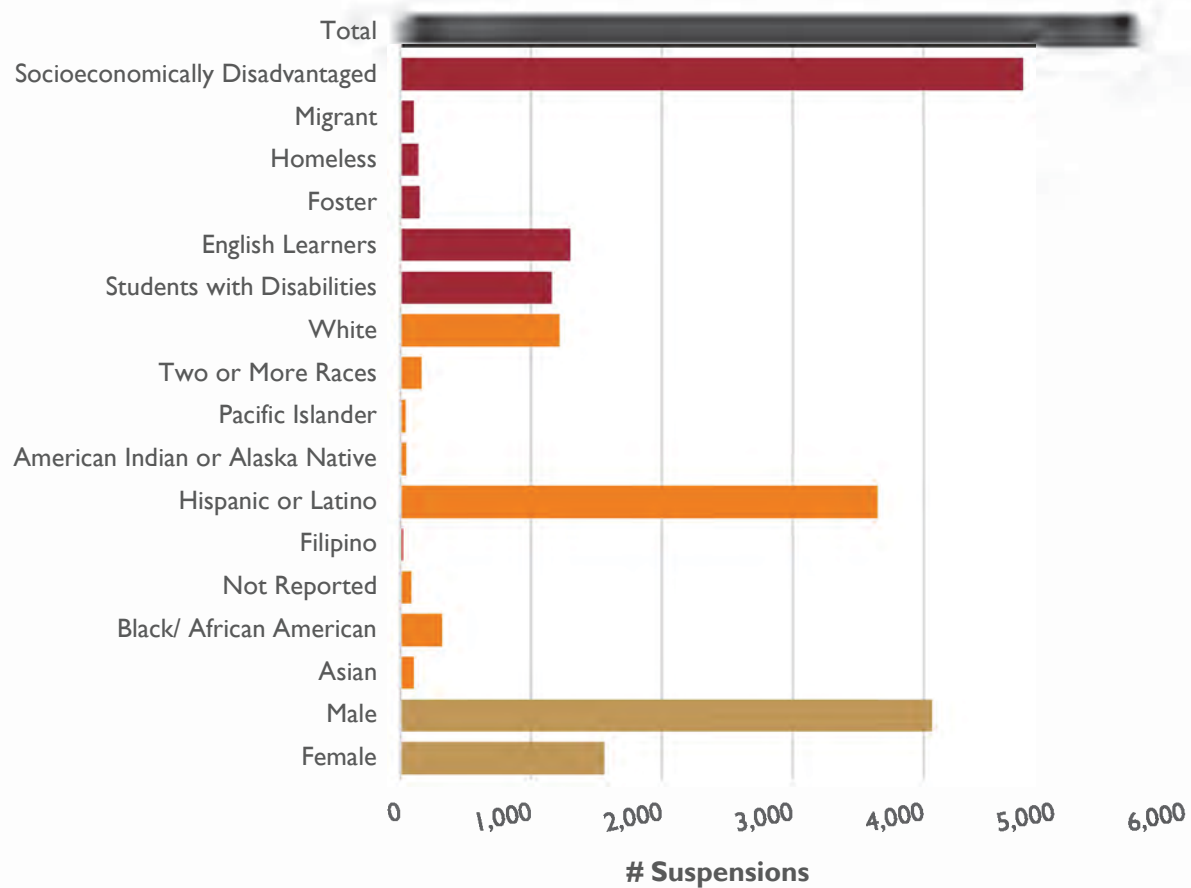
Source: California Department of Education 2018-2019 Four-Year Adjusted Cohort Outcome

Chart 29. Suspension Rate by Student Group, Stanislaus County



Source: California Department of Education 2018-2019 Note: Students may belong to multiple groups.

Chart 30. Number of Unduplicated Students Suspended by Group in Stanislaus County



Source: California Department of Education 2018-2019 Note: Students may belong to multiple groups.

Parks

Park access is a community amenity that may not be accessible proportionately to all resident demographics. The California Department of Parks and Recreation measures park access for all California communities as part of the Statewide Comprehensive Outdoor Recreation Program (SCORP), measuring the population density of areas physically farther than a half mile from a park and the density of parks in each census tract per 1,000 residents. The measurements help identify areas that are not within walking distance of a park and any populated areas with few parks per person. Figure 34 depicts areas across the County without park access within a half mile.

The Department of Parks and Recreation estimates that 24 percent of Stanislaus County residents live further than a half mile from a park, a proportion equal with the State of California. Stanislaus County residents also have a slightly higher number of people with adequate parkland density available per person than the California average. Fifty-eight percent of Stanislaus County residents live in areas with less than 3 acres of parks/open space per thousand residents (a benchmark for adequate park density) versus 62 percent of all Californians.

The Cities of Modesto and Turlock both have park access within a half mile for nearly all residents within city boundaries. The developed areas around the city boundaries, however, have gaps in park access. To a lesser extent, this pattern also exists for Patterson, Oakdale, Riverbank, Ceres, and Newman.

It is important that park access by members of protected classes be a part of the planning process and reflect the demographics in the community. The 2018 Stanislaus County Parks & Recreation Master Plan notes change in ethnicity in the County as there has been an overall increase in the County's Hispanic or Latino population. It states, "Stanislaus County's Hispanic/Latino population has increased from 31.7 percent of the total County population in 2000 to 43.6 percent by 2015. This statistic must be acknowledged as a driver for future County parks and recreation planning and programming efforts." (2018 Stanislaus County Parks & Recreation Master Plan)

Language is also a consideration in park planning within Stanislaus County's Parks & Recreation Master Plan. The report states that, "the provision of Spanish language materials is perhaps the greatest take-away for increasing presence specifically within the Hispanic/ Latino community. Provisions must be made in the form of bilingual parks signage, handouts, and other exhibits promoting Stanislaus County Parks and Recreation offerings and initiatives." (2018 Stanislaus County Parks & Recreation Master Plan) Acknowledgement of changing ethnicity and primary language of residents in the County will help ensure active participation and access to parks.

Although overall population demographics should be considered in park planning, geographic population demographics should also be used by all jurisdictions within the County to assess equal access to parks, especially small neighborhood parks where walking distance factors into park usage and demographics may shift.

Map 5. Populated Areas with No Park Access Within ½ Mile



Population Density (No park access within ½ mile)



Source: California Department of Parks and Recreation, SCORP Park Access Tool

Internet Access

Internet access is vital for households to participate fully in modern society. Those without this technology are at a disadvantage, such as students completing schoolwork, teens and adults applying for a job, or individuals taking online classes to expand workforce skills to gain or change employment. Internet access can help households take fewer vehicle trips, access medical information, and manage finances. (Broadband Survey: Digital Divide Persists in California but Schools Are Helping to Improve Access for Students, California Emerging Technology Fund, March 12, 2019)

In 2017, 90 percent of California households had access to the Internet and 74 percent had broadband Internet at home, an 8 percent increase in overall access and 4 percent increase in home broadband access since 2013. (California's Digital Divide, Public Policy Institute, March 2019) "Computer" use has expanded to include smartphones, tablets, laptops, and other similar devices. Figure 35 indicates that about as many households now access the Internet through a smartphone as a laptop or desktop computer.

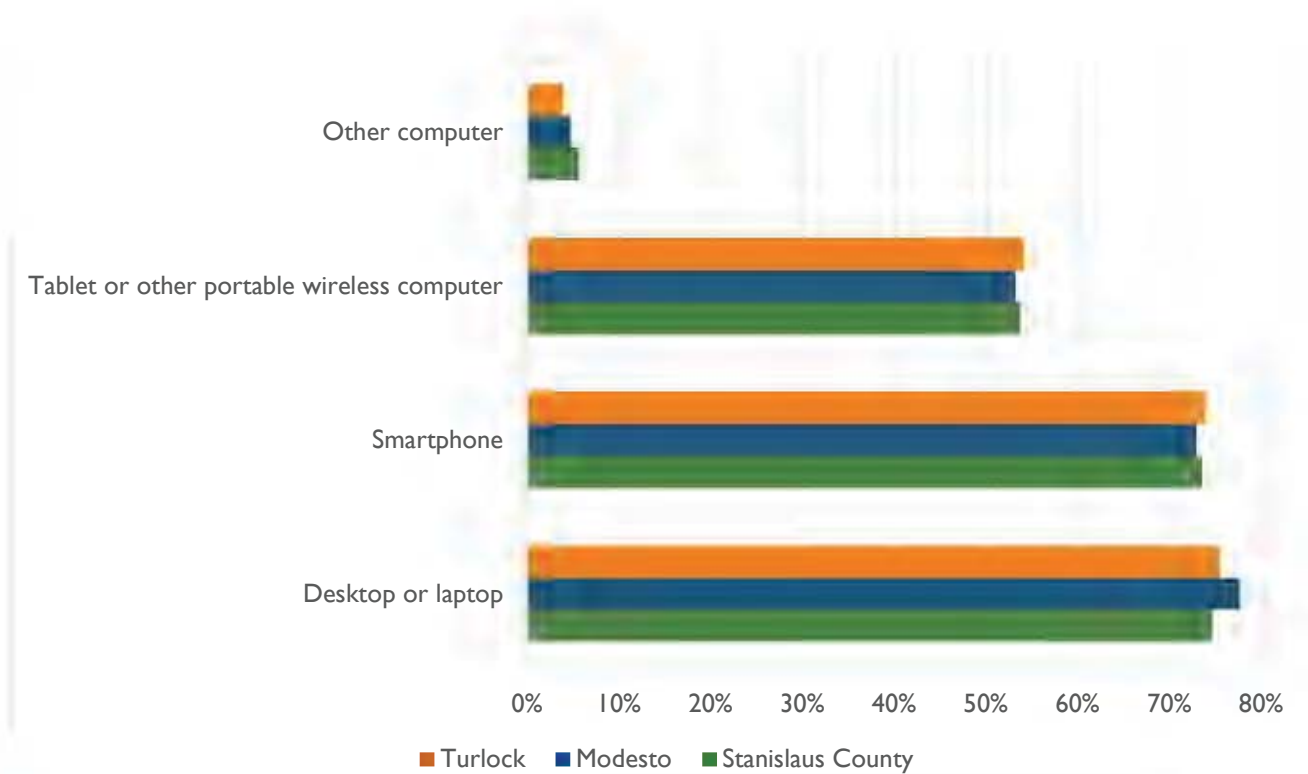
Throughout California, several demographic groups have broadband Internet access rates below the State average. This includes households earning \$20,000 per year or less, seniors (adults 65 years or older), Hispanic or Latinos with limited English proficiency, those with a disability, and adults who did not graduate high school. (Internet Connectivity and the "Digital Divide" in California Households: 2016 California Emerging Technology Fund/ The Field Poll)

Household income and age have the largest gaps in Internet access. In Stanislaus County, 44 percent of households earning \$20,000 or less annually do not have Internet access, while only 6 percent of households making at least \$75,000 do not have access. Across the state, about half of households without Internet access cite the cost of broadband service or a computer/device for their lack of access. Three in four of these households do not know they may qualify for discounted, income-based Internet service in California. (Broadband Survey: Digital Divide Persists in California but Schools Are Helping to Improve Access for Students, California Emerging Technology Fund, March 12, 2019)

About one third of Stanislaus County residents age 65 or older do not have Internet access. This percentage is only 28 percent in Modesto but 38 percent in Turlock. By comparison, 13 percent of those under 18 years of age do not have Internet access. This figure is assisted by the fact many schools assign a mobile computing device to students.

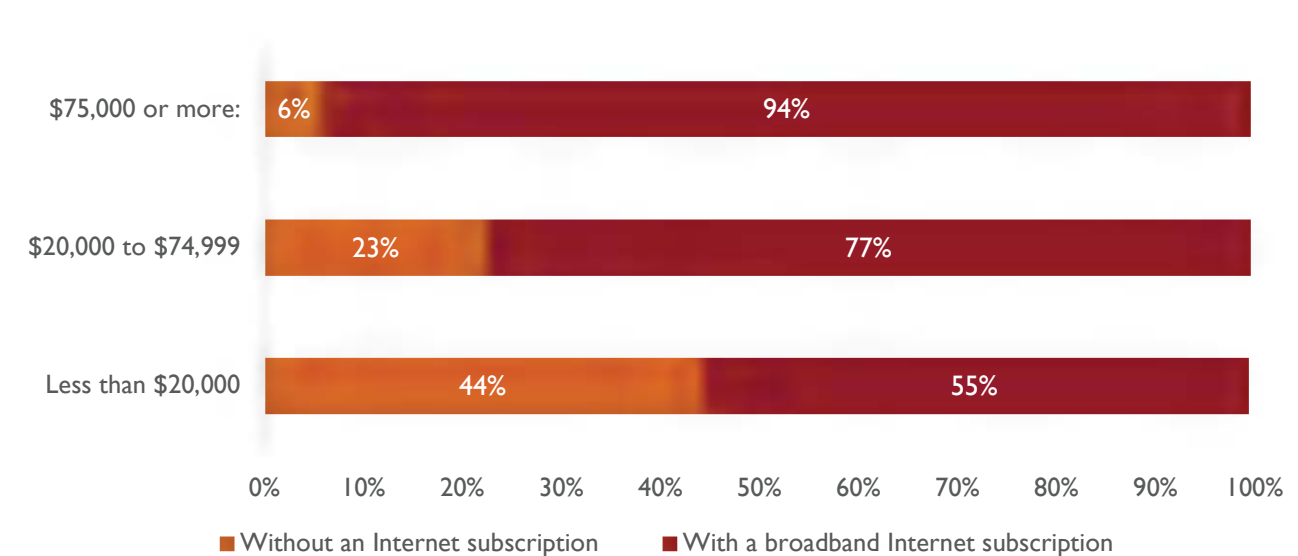
There are some differences in Internet access between different racial and ethnic groups. About 18.6 percent of Hispanic or Latino residents in Stanislaus County do not have Internet access compared to 14.3 of non-Hispanic Whites. (Access for both groups is improved within Modesto and Turlock.) It is worth noting that Hispanic or Latino Californians are more likely to use smart phones alone for Internet access, and among Spanish-speaking Hispanic or Latinos in California, almost half of all Internet access is only through use of a smart phone. (Internet Connectivity and the "Digital Divide" in California Households: 2016 California Emerging Technology Fund/ The Field Poll)

Chart 31. Type of Computer Used in Households in Stanislaus County



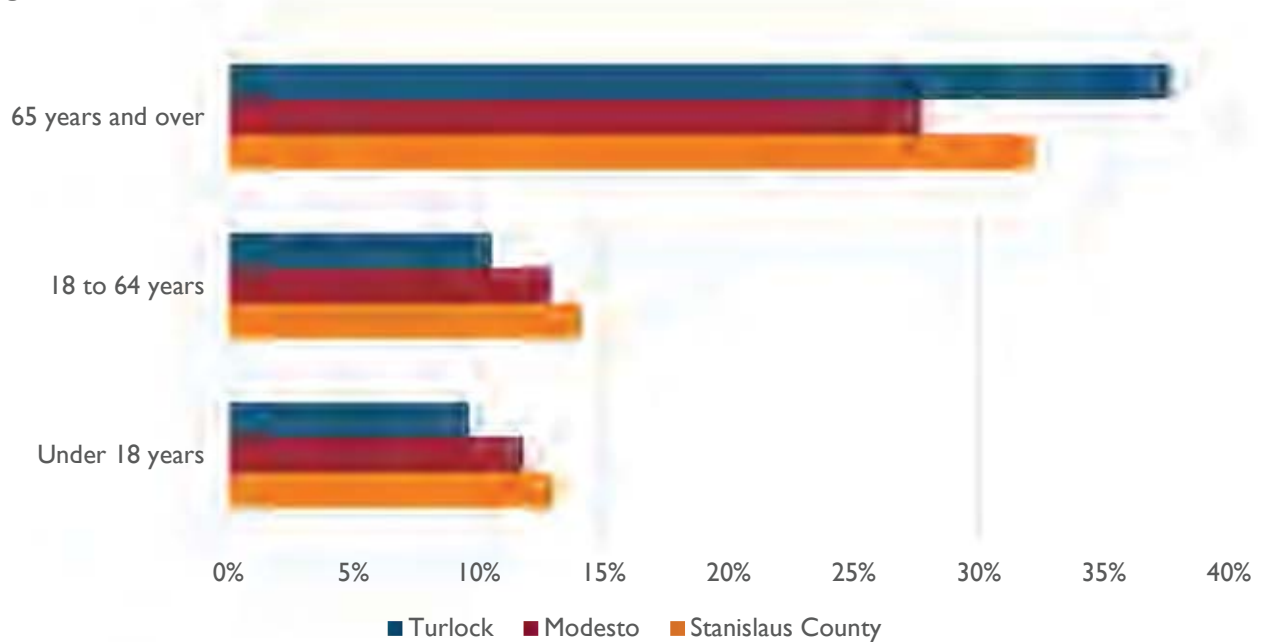
Source: 2013-2017 ACS 5-Year Average, Table S2801

Chart 32. Broadband Internet Access by Household Income in Stanislaus County



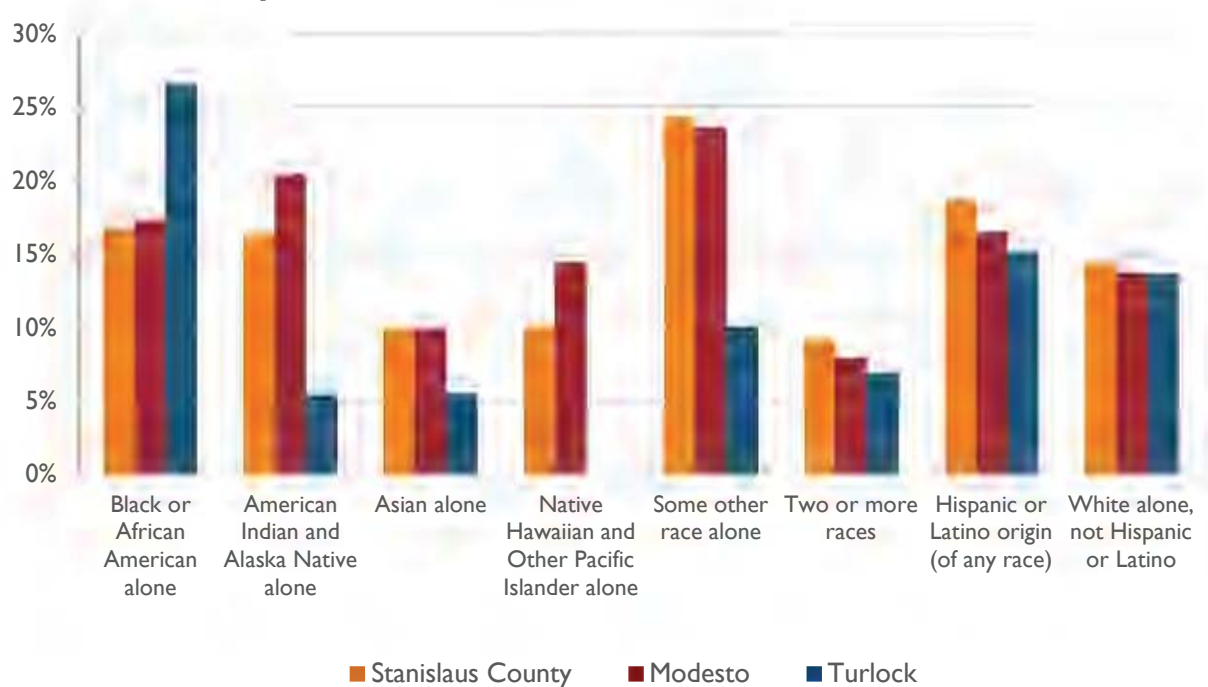
Source: 2013-2017 ACS 5-Year Average Table, S2801

Chart 33. Population with Lack of Internet (With Computer) or No Computer by Age



Source: 2013-2017 ACS 5-Year Average Table, S2802

Chart 34. Lack of Internet (With Computer) or No Computer in Household by Race and Ethnicity and Jurisdiction



Source: 2013-2017 ACS 5-Year Average Table, S2802

PUBLIC SECTOR POLICY REVIEW

Introduction

National, state, and local public policies affect fair housing choice and neighborhood availability by influencing the amount, cost, and location of available housing. Public policies also affect what amenities are available in a given neighborhood such as grocery stores, parks, and health clinics, and affect transportation options that connect the neighborhood to schools, jobs, and other regional opportunities. Policies that disproportionately limit housing and neighborhood opportunities for specific groups of people are considered impediments to fair housing or actions that do not actively affirmatively further fair housing.

Public policies designed and adopted with good intentions can result in unintended consequences when implemented if the effect is a restriction on fair housing choice for people who belong to a protected class. For this reason, it is worth reviewing both the intent of public policies and their consequences.

An assessment of government regulations, policies, and practices enacted by jurisdictions across Stanislaus County can help determine potential policy-created impediments to fair housing choice.

Federal Laws and Local Housing Choice

Fair Housing Amendment Act (FHAA) 1988

A significant update to the Fair Housing Act was enacted into law in 1988 that gave specific housing protections to people with disabilities in addition to any rights codified in earlier laws. Called the Fair Housing Amendment Act (FHAA), the update includes several protections that may influence public policies and laws at different levels of government. The law states that it is illegal to:

Refuse to permit reasonable modifications, at the expense of the handicapped renter, except that a landlord may condition interior modifications where reasonable; to refuse to make reasonable accommodations in rules, policies, or services to afford handicapped individuals equal use and enjoyment of a dwelling; and to fail to design and construct multifamily dwellings with specified adaptive accessibility and usability designs.

The FHAA applies to local governments as well as private housing providers. Under the FHAA, local governments are required to “reasonably accommodate” housing for persons with disabilities in their land-use planning and policies. Jurisdictions must grant variances and zoning changes, if necessary, to make new construction or rehabilitation of housing for persons with disabilities feasible but are not required to fundamentally alter their zoning ordinance. The failure to allow for reasonable accommodations in policies to allow persons with disabilities to live in the community will violate the Fair Housing Act regardless of whether there is discriminatory intent.

Regarding multifamily dwelling design and construction, the law requires that state and local governments incorporate specific accessibility and usability standards into their new construction and design requirements as well as building codes.

Although most local governments are aware of state and federal requirements for landlords to provide reasonable accommodations, if specific reasonable accommodation policies or procedures are not present at the jurisdictional level, residents with disabilities may be unintentionally displaced or discriminated against. All jurisdictions within the County include reasonable accommodation policies to meet the needs of their communities. (29 U.S.C. § 794)

Americans with Disabilities Act (ADA) 1990

The Americans with Disabilities Act (ADA) gives broad protections to people with disabilities in the workplace, schools, transportation, and places (public or private) open to the general public. Title II of the ADA specifically applies to all state and local governments and protects individuals with disabilities from discrimination in programs, activities, and services funded by public entities.

When constructing or renovating new public buildings, State and local governments are required to follow specific architectural standards to make them accessible to people with physical disabilities. They must also relocate or provide access to programs in older buildings inaccessible to people with disabilities and have methods to communicate with people who have hearing, vision, or speech impairments.

Included within the category of State and local services are activities related to local planning and zoning. It can also include government activities like constructing sidewalks, creating snow removal policies, and managing public park reservations.

Title III of the ADA applies to public accommodations within non-government establishments such as retail stores, restaurants, movie theaters, and day care centers. Private transportation services are covered by Title III, as are nonprofit organizations, and any other venue open to the general public. This section of the ADA requires that public accommodations prohibit exclusion, segregation, and unequal treatment of people with disabilities. Public accommodations also must comply with architectural standards for new and renovated buildings; accommodate reasonable modifications to policies, practices, and procedures; and be able to communicate with people with hearing, vision, or speech disabilities. Additionally, public accommodations must remove barriers in existing buildings where it is possible without much difficulty or expense. Religious buildings without public funding are exempt. (42 U.S.C. §§ 12101 et seq., 28 CFR Parts 35-36) (*What is the Americans with Disabilities Act (ADA)?* ADA National Network, <https://adata.org/learn-about-ada>, Web. February 5, 2020.)

State Laws and Local Housing Choice

California has many housing laws related to housing, zoning and land-use, permitting, planning, and housing financing policies. These include:

Housing Permitting

- Cities and counties must allow for housing for persons with disabilities, homeless persons (including emergency shelters, transitional housing, and supportive housing), and extremely low-income households including single-room occupancy (SRO).
- Replacement housing when allowing conversion or demolition of housing occupied by low- and moderate-income households. (§ 65008 and § 65580-65589.8)

Growth Limits

- Public growth initiative ordinances are allowed under state law.
- Zoning regulations and ordinances that limit housing must state the rationale behind the regulations in terms of the city's police powers: the public health, safety, and welfare of the community. (§ 65863.6)

Inclusionary Zoning

- Inclusionary zoning is allowed under state law to increase the number of deed-restricted lower-income housing units in exchange for housing permitting. (§65589.8)

Density Bonuses

- Local governments are authorized to allow density incentives for private housing development in exchange for the inclusion of deed restricted lower- income housing units. (§§ 65915-65917)

Accessory Dwelling Units (ADUs)

- Accessory Dwelling Units (ADUs) or “Granny unit” regulations allow for specific types of secondary residential dwelling units through California law, with special consideration for units intended for adults over the age of 62. (§ 65852.1.)

Local Laws and Housing Choice

Occupancy Standards

Just as regulations on the definition of “family” can result in a disparate impact, restrictions on the allowable number of individuals within a housing unit can violate fair housing laws on the basis of family status.

Historically, strict occupancy standards have been used either by local jurisdictions or individual landlords to keep families from renting housing in an area. Families with children and large households often face discrimination in the housing market, particularly in rental housing, which can take the form of occupancy standards under the guise of health or safety regulations. As a result of being denied housing due to occupancy standards, families (particularly larger families with children) may not be able to live within their desired household makeup or may be forced to find poor quality housing that breaks local ordinances. Occupancy standards may therefore be an impediment to fair housing choice and may be found in zoning, health, land-use, building or other codes.

No State or federal fair housing laws create exact numeric values for occupancy standards. Both government and landlords can set an occupancy standard, but fair housing violations are decided on a case-by-case basis by the courts. The FHA states that, “nothing in this title shall limit the applicability of any reasonable local, state, or federal restrictions on the maximum number of occupants permitted to occupy a dwelling unit”. The word ‘reasonable’ is the key word and is a matter of court interpretation.

The HUD standard for occupancy is two persons per bedroom, however this figure has not been codified into federal law. The California Department of Fair Employment and Housing (DFEH) has used the “two-plus-one” rule (two persons per bedroom plus an additional person) when considering a reasonable maximum standard in fair housing cases, though there have been key exceptions. The amount and distribution of “habitable space” in a housing unit, and the number and size of bedrooms, are also factors.

Under either federal or State occupancy guidelines a landlord cannot, for example, restrict occupancy to more than three persons in a three-bedroom unit, or increase the rent for a one-bedroom unit if a baby is added to the household by a couple. A city could not impose a one-person-per-bedroom provision in their zoning ordinance.

Other issues related to occupancy, such as lack of parking or gender of the children occupying one bedroom, should not be factors considered by the landlord when renting to a household.

A jurisdiction can use the Uniform Housing Code (Section 503(b)) to set maximum occupancy for residential units, a federal standard that has been adopted by California. Under this building code, a dwelling unit must have at least one room which is more than 120 square feet in area. Other habitable rooms, except kitchens, are required to have a floor area of at least 70 square feet. So, for the smallest housing unit legally permitted to be constructed, there may be two occupants. For every additional occupant there must be an additional 50 square feet. California Fire Code also determines residential occupancy standards, but the number of people per unit or per square foot generally imposes fewer limitations than the building code.

No Stanislaus County jurisdictions have additional occupancy limits beyond adopted building and fire code.

Rental Registration

Rental registration ordinances can help a municipality ensure housing conditions are safe and sanitary for renters who may not have the knowledge or ability to advocate for themselves and contact the proper authorities for housing issues. Correcting housing issues may require overcoming specific language, education, or other barriers (such as knowledge of health regulations and building code) and can be an impediment to housing choice when the burden of notification and inspection is placed on tenants and not the landlord. Provided the ordinances do not add conditions such as occupancy limits that restrict fair housing choice, these ordinances can be considered a best practice in affirmatively furthering fair housing. If a rental registration ordinance is not present, clear points of contact for code enforcement issues can help tenants navigate correcting housing issues.

Modesto's Rental Housing Safety Program (effective October 2019) applies to all rental residential housing units over 10 years old in the City or those inspected as part of a government program (e.g. the Housing Authority). The program, run by the Neighborhood Preservation Unit, requires rental properties to be registered with the City by the property owner and comply with all local health, building, and safety codes. Modesto does not have a rental registration ordinance that requires additional requirements of rental buildings beyond existing city code.

Rent Control

California's Costa-Hawkins Rental Housing Act, passed in 1995, prohibits local governments from using rent control on housing first occupied after February 1, 1995, and other specific types of housing such as condos, townhouses, and single-family homes. No cities in Stanislaus County, including Modesto, have rent-control ordinances.

Development Fees

Housing development imposes short- and long-term costs upon local government, such as the cost of providing site reviews, permitting and inspection, and maintaining General Plan and zoning regulations addressing housing development. Jurisdictions also charge impact fees to offset the cost of providing the infrastructure and public facilities that are required to serve new housing development. To help recoup costs and ensure that essential services and infrastructure are available when needed, Stanislaus County jurisdictions charge various types of development fees. The fee amounts vary based on the needs of each jurisdiction and the services provided.

The fees can be a significant factor in housing development throughout California by raising housing costs and disincentivizing new residential development, factors that contribute to statewide high housing costs. Among California jurisdictions, fees account for between six and eighteen percent of the price of housing. (Turner Center for Housing Innovation- UC Berkeley, It All Adds Up: The Cost of Housing Development Fees in Seven California Cities, March 2018)

As a best practice, the public and developers should be able to access a jurisdiction's current fee schedules to estimate fees as a part of total development project costs in advance.

Until 1978, property taxes were the primary revenue source for financing the construction of infrastructure and improvements for residential development in California. Proposition 13, passed in 1978, limited a local jurisdiction's ability to raise property taxes and increasing reliance on other funding sources to provide infrastructure, public improvements, and public services. An alternative funding source widely used among local governments in California is the development impact fee, which is charged to the project developers/owners, for publicly provided infrastructure that supports the development, including water and sewer facilities, parks, and transportation.

For jurisdictions to charge an impact fee, the California Mitigation Fee Act requires that the jurisdiction demonstrate the "nexus" between the type of development in question and the impact being mitigated by the proposed fee, and that fee amount be proportional to the impact caused by the development. Fees not covered by the California Mitigation Fee Act include inclusionary housing ordinance in-lieu fees, permit processing fees, utility connection fees, and fees included within specific development agreements between a jurisdiction and a developer.

Despite state law limiting direct impact fees, the fees can be a large part of a jurisdiction's total fee requirements for housing development. Because developers tend to pass these fees onto the final housing owner, the effects of reducing these fees on housing affordability depend on the amount of the fee reduction and current home prices. Because the eventual owner bears the brunt of fees, high fees limit development of lower-cost housing more than higher-cost housing. (Turner Center for Housing Innovation- UC Berkeley, Current Practices and Policy Considerations to Improve Implementation of Fees Governed by the Mitigation Fee Act, August 2019)

A reduction in development fees for low-income housing may help these projects become financially feasible. A jurisdiction deferring development fees until a certain time after project completion can also help add flexibility the project's upfront costs and assist in the development of low-income housing.

The General Plan and Zoning Ordinance

General Plan

The General Plan is a planning document that serves as a framework for cities and counties to establish long-term goals and policies to guide land use and development in the community. The State of California requires that all localities completing a General Plan include seven elements in their Plan: land use, circulation, housing, conservation, open space, noise, and safety. Some communities also must address environmental justice and/or air quality in their Plans and any community can add any additional elements in their General Plan that they desire. (§ 65302) Two of the required elements, the housing and land-use elements, can directly impact local housing markets because they define key parameters for housing development such as permitted density, required fees, and allowable zoning uses.

California law requires that local governments adequately plan to meet the existing and projected housing needs of all members of the community. The law acknowledges that for the private market to adequately address housing needs and demand, local governments must adopt land-use plans and regulatory systems that provide opportunities for, and do not constrain, housing development. The state outlines requirements for each community's Housing Element of the General Plan, which are then subject to review by the California Department of Housing and Community Development (HCD) for compliance with State law before they can be adopted by the local government. The Housing Element of the General Plan details a local government's strategy to address their jurisdiction's housing needs and regulates existing and future housing development opportunities. A Housing Element must:

- Identify sites which will be made available through appropriate zoning and development standards that have adequate services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the community's housing goals;
- Assist in the development of adequate housing to meet the needs of low- and moderate-income households;
- Address, and if appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing;
- Conserve and improve the condition of the community's existing affordable housing stock; and
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, sexual orientation, gender identification, or any other arbitrary factor.

Within a Housing Element, a jurisdiction specifically details how a set number of housing units can be produced that meet the housing needs of different income groups, a housing goal called the Regional Housing Needs Assessment (RHNA). The RHNA projects how many and what types of housing units will be needed within the jurisdiction. In their General Plan Housing Element, jurisdictions show how the given allocations could be met through zoning, available sites, funding, local regulations, etc. and how the jurisdiction is addressing impediments to housing development.

Though these goals are not a mandate for housing production, actions taken by a jurisdiction to make these units possible should result in additional housing units being developed because of high housing demand. For lower-income housing unit goals, each jurisdiction needs to identify sites that meet specific criteria which should accommodate projects that could support lower income housing.

The RHNA housing goals are calculated based on a jurisdictions projected population demographics during the future RHNA cycle, particularly the number of people within "low-" (50 to 80 percent of AMI), "very low-" (30 to 50 percent of AMI), and "extremely low-" (0 to 30 percent of AMI) household income categories. A region's Council of Governments (COG) allocates the actual housing numbers per jurisdiction. In Stanislaus County, this body is the Stanislaus Council of Governments (StanCOG).

The Land-Use Element of the General Plan also influences housing choice by defining uses for specific geographic areas including allowable development densities and the general description of what the community would like to see the land used for such as residential, commercial, industrial, open space, and agricultural purposes. As it applies to housing, the Land-Use Element establishes a range of residential land-use categories, specifies densities (typically expressed as dwelling units per acre [du/ac]), and suggests the types of housing appropriate in a community. While the Land-Use Element establishes different parameters for residential development, it is a jurisdiction's zoning ordinance which details the specific development standards for the community. In other words, the Land-Use Element serves as a guiding

framework for a community's land-use policy, while the zoning ordinance is the explicit code that lays out permitted uses within each zone.

Land-Use Elements may also describe other community components related to housing choice like transportation plans including bicycle and pedestrian routes, flood zones and information on known hazards, and social equity analysis.

Zoning Ordinance

A jurisdiction's zoning ordinance is the section of its municipal code that details and sets requirements for the specified land-use designations laid out in the General Plan. A zoning ordinance establishes zoning districts that correspond with the locality's land-use element and contains two key components: a set of legal descriptions for each zone and an official zoning map. Each zone description sets development standards and permitted uses for each zoning district to govern the density, type, and design of different land uses for the purpose of protecting the health, safety, and welfare of the community. (§ 65800-65863).

As the zoning ordinance relates to fair housing, several of its components can restrict housing development and access (and through them, housing choice) by constricting the local supply of housing units or discriminating against protected groups outlined in state and federal law. While the Fair Housing Act does not pre-empt local zoning laws, it does apply to municipalities and other local government entities and prohibits them from enacting or implementing land-use policies that exclude or otherwise discriminate against protected persons. Local policies that are "facially neutral" (that is, they apply to all persons, not just those included in a protected group) could be violations of the Fair Housing Act if they have a disparate impact or discriminatory effect on protected persons, whether intentionally or not. For instance, land-use policies such as density or design requirements that make residential development prohibitively expensive, limitations on multi-family housing, or a household occupancy standard may be considered discriminatory if it can be proven that these policies have a disproportionate impact on minorities, families with children, or people with disabilities.

As part of the Housing Element, jurisdictions are required to evaluate their land-use policies, zoning provisions, and development regulations, and make efforts to mitigate any constraints identified within the Plan as restrictions to housing choice. One type of zoning law that courts have ruled as having a disparate impact on people with disabilities is definitions of the term "family" that allow any number of related persons to live together but limit the number of unrelated persons who may live together. Although applicable to groups of unrelated and non-disabled persons (e.g., college students, nuns, etc.), these laws may be deemed to have a disparate impact on persons with disabilities who often need to live in group settings for both programmatic and financial reasons. Although a seemingly neutral policy, such ordinances can disproportionately harm specific groups.

The Fair Housing Act addresses this type of limited housing choice by prohibiting state and local land use and zoning laws, policies, and practices to discriminate based on a characteristic protected under the Fair Housing Act. Both intentional and unintentional discrimination that is a result of public policy is in violation of the Fair Housing Act. The U.S. Supreme Court affirmed that unintentional discrimination caused by land use and zoning laws and without a legitimate purpose is illegal in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*, stating that "unlawful practices include zoning laws and other housing restrictions that function unfairly to exclude minorities from certain neighborhoods without any sufficient justification." (135 S. Ct. 2507 2015) These laws have a discriminatory effect ("disparate impact") on persons in a particular group, whether intentional or not.

In 2016, HUD and the U.S. Department of Justice (DOJ) released a Joint Statement updating guidance about how the federal Fair Housing Act applies to state and local public policies like land use (including as found within a General Plan) and zoning laws. Examples of discrimination given in the statement include:

- Placing a moratorium on the development of multifamily housing because of concerns that the residents will include members of a particular protected class.
- Citing individuals who are members of a particular protected class for violating code requirements for property upkeep while not citing other residents for similar violations.
- Requiring a proposed development provide additional security measures based on a belief that persons of a particular protected class are more likely to engage in criminal activity.
- Requiring an occupancy permit for persons with disabilities to live in a single-family home while not requiring a permit for other residents of single-family homes.

Reasonable Accommodation in Zoning

Land use and zoning discrimination based on protected characteristics related to disability is also prohibited under Title II of the Americans with Disabilities Act (“ADA”), Section 504 of the Rehabilitation Act of 1973 (“Section 504”), and Title VI of the Civil Rights Act of 1964. Residents who are disabled have a right under these laws to request a reasonable accommodation or modification to zoning ordinance requirements that restrict their use or enjoyment of their residence, usually in the form of a zoning variance.

Not all reasonable accommodation requests are required to be granted but those that are reasonable and necessary for the applicant should be granted if they do not conflict with the needs of the community. For this reason, an official reasonable accommodation policy for local planning and zoning committees may help guide accommodation decisions and treat applicants as uniformly as possible based on findings of fact. (A Primer on Disability for Land Use and Zoning Law, Journal of Law, Property, and Society Vol. 4 March 2018)

In Stanislaus County, all jurisdictions have a reasonable accommodation policy within their zoning ordinance except for Modesto who references a reasonable accommodation policy in their General Plan. Table 3 outlines the source of each jurisdiction’s policy.

Table 3. Reasonable Accommodation Policies by Jurisdiction

Jurisdiction	Reasonable Accommodation Policy
Ceres	Policy outlined in Ch 18.110 of Zoning Ordinance
Hughson	Policy outlined in Ch 17.03.062 of Zoning Ordinance
Modesto	Housing Element references a reasonable accommodation policy but no mention in the Municipal Code
Newman	Zoning Ordinance cites the city's reasonable accommodation policy (Ch 1.19)
Oakdale	Zoning Ordinance cites the city's reasonable accommodation policy (36-18.32)
Patterson	Zoning Ordinance outlines the City's reasonable accommodation policy (Ch 18.89)
Riverbank	Zoning Ordinance cites the city's reasonable accommodation policy (Ch 153.221)
Turlock	Part of the city's past Housing Element stated working towards complying with federal reasonable accommodation provisions
Waterford	Zoning Ordinance outlines the city's reasonable accommodation policy (Ch 17.03.010)
Stanislaus County	Zoning Ordinance outlines the County's reasonable accommodation policy (Ch 21.86)

Source: Zoning Ordinance for each jurisdiction

Zoning Definitions

A community's zoning ordinance could restrict access to housing for individuals or groups of people based on the official definitions of specific terms. The terms "family", "disability" or "disabled person", "elderly", "homeless shelter" or "emergency shelter", "group home", "rooming house", and any number of other terms could be impediments to housing choice if they are interpreted to conflict with the Fair Housing Act (FHA) or California's Fair Employment and Housing Act (FHEA).

Federal Fair Housing Act Definitions

Disabled person: An individual with mental or physical impairments (including hearing, mobility, and visual impairments, cancer, chronic mental illness, HIV/AIDS, or mental retardation) that substantially limits one or more major life activities.

Note: the FHA uses the term "handicap" instead of "disability".

Familial Status: Includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

Family

A key definition that can restrict housing choice within a zoning code is "family" if a jurisdiction's zoning ordinance defines the term in a way that conflicts (in theory or in practice) with the FHA or FHEA. For instance, a landlord may refuse to rent to a pair of college students living together, unmarried couples, or a family with foster children due to the fact these households do not fit within the jurisdiction's definition of a "family". A landlord may also use the definition of a family as an excuse for refusing to rent to a

household based on other hidden reasons, such as household size, race, or gender identity. Even if the code provides a broad definition, deciding what constitutes a “family” should be avoided to prevent confusion or give the impression of bias or housing restriction, especially definitions that restrict how many household members may live together (other health or building codes may still apply) or how members of a family may be related (i.e., by blood, marriage or adoption, etc.)

All Stanislaus County jurisdictions’ definitions of “family” appear to comply with state and federal fair housing law by avoiding describing the nature of the relationship between members of the household or the number of people that can belong to the household (except in alignment with building code).

Disability

Just as limitations on the definition of “family” can impact protected groups by restricting access to and availability of housing options, the terms “disabled individuals,” “disability,” and other similar references to people with a disability can be impediments to housing choice when narrowly defined in a jurisdiction’s zoning code or defined in a way that conflicts with fair housing law.

No jurisdictions in Stanislaus County define “disability” in their zoning ordinance in a way that conflicts with fair housing laws. Hughson, Turlock, and Waterford define “disability” in documents other than their zoning ordinance that still appear to apply to housing decisions. Should there be any discrepancies between the Cities’ definitions and fair housing act laws that result in housing restriction for people with disabilities, the Cities’ definition could be found to be in violation of fair housing laws. These definitions should be examined in the context of a jurisdiction’s entire legal code.

As a note, the Federal Fair Housing Act and California Fair Employment and Housing Act do not define “disability” as including psychoactive substance use disorders resulting from the current unlawful use of illegal substances or current users of illegal substances. The inclusion of this provision by Ceres and Modesto does not conflict with either fair housing law.

Other Zoning Definitions

Additional definitions of housing types or allowable residents of certain housing can also be impediments to fair housing choice. (For all zoning definitions reviewed, see Appendix I)

Turlock’s zoning ordinance definition of “housing for the elderly” has the possibility of violating federal or California law regarding housing for seniors as the definition restricts this type of housing to “persons sixty (60) years of age or older or couples where either the husband or wife is sixty (60) years of age or older.)

The Turlock zoning code states that “Housing for the elderly” shall mean “a building or group of buildings containing dwellings where the occupancy of the dwellings is restricted to persons sixty (60) years of age or older or couples where either the husband or wife is sixty (60) years of age or older.” This does not include a development that contains convalescent or nursing facilities. § 9-1-202

The federal HOPA modifying the FHA definition of senior housing includes housing intended and operated for occupancy by persons 55 years of age or older and at least 80 percent of the units with an occupant who is verified to be 55 years of age or older. California law considers housing for seniors to be for those 62 years of age or older or 55 years of age or older in a (designated) “senior citizen housing development”.

The Turlock and California laws do not match precisely as there is a discrepancy in the definition of “senior housing” between Turlock (60 years of age or older) and California’s senior housing definition (62 years of age or older or 55 years of age or older in a designated “senior citizen housing development”). (Section 43-53.7 of the Civil Code)

There is also a difference in the allowable household relationships of senior housing residents with a non-spouse domestic partner, primary physical/economic support person, and/or disabled child, grandchild, or partner under the age of 60.

Turlock’s definition of allowable residents in senior housing also includes the terms “husband” and “wife” while California law allows residents of senior housing to live with someone 45 years of age or older that is their spouse, domestic partner, or person providing primary physical or economic support to the senior. California law also includes the provision that the senior may live with a disabled child or grandchild or disabled spouse/partner who must permanently reside in the household due to a disability. (Section 43-53.7 of the Civil Code)

All other zoning definitions appear to have no conflict with fair housing laws or restrict housing choice.

Density Bonuses

A density bonus is a local incentive to increase the number of deed-restricted housing units for lower-income households by private housing developers in exchange for an increase in building height, housing density (units/acre) or building footprint (also measured as a “floor area ratio”) above what allowed by right within the zoning ordinance.

While local governments create their own density bonus policies, jurisdictions in California are subject to the State’s Density Bonus Law (§ 65915-65918) which incentivizes affordable and senior housing with up to a 35 percent increase in unit density. There is also a component of the law which allows density bonuses for commercial developments that incorporate affordable housing as well.

The law requires jurisdictions to provide a specified minimum density bonus for creating affordable housing units. The number and type of affordable units determine the minimum density bonus percentage to which the development is entitled by right. Eligible projects have at least:

- 5 percent of the units affordable to “very-low income” households (under 50 percent of AMI)
- 10 percent of the units affordable to “low-income” households (under 80 percent of AMI)
- 10 percent of the units affordable to “moderate-income” households (under 120 percent of AMI) if the project units are condominiums.
- 10 percent of the units are for transitional foster youth, disabled veterans, or homeless persons and charge “very-low income” rents.

The state density bonus law also applies to senior housing projects and projects that include a childcare facility. These projects, with at least 35 units, follow California’s Unruh definition of “senior housing” and receive a density bonus up to 35 percent based on the amount of housing developed. (§65915 – 65918) As of January 2020, all jurisdictions within Stanislaus County have zoning ordinances that include density bonuses that comply with state law.

Parking Requirements

The number of parking spaces required for housing developments can reduce the project's density and increase per unit development costs, lowering the number of affordable housing units produced and ultimately constricting the availability of housing types in a community. Though not as severe an impediment to housing development as in larger cities such as San Francisco or Los Angeles, multifamily, affordable, and/or senior housing projects in Stanislaus County cities can be impacted by parking requirement policies. Exceptions to parking requirements for affordable and/or senior housing developments helps solve this development constraint, sometimes offered along with density bonuses.

Under California laws for accessory dwelling units (ADUs) effective January 1, 2020, cities cannot require parking within one half mile of public transit or when a garage is converted to an ADU. All Stanislaus County parking requirements for ADUs need to reflect this new statewide requirement. Jurisdictions are in the process of updating their ordinances to comply with the States new ADU requirements and, in the meantime, must apply all applicable State standards regardless of local ordinance requirements.

For multifamily developments, several communities do not differentiate between smaller and larger units. For one-bedroom units in multifamily buildings, parking requirements over one unit can be an impediment to building housing, particularly housing for seniors and persons with disabilities if parking requirements are not modified for these types of housing developments.

Some jurisdictions in California will also waive or reduce parking requirements when certain scenarios apply, such as a development's proximity to public transit or a car-share vehicle. While not current policy within Stanislaus County jurisdictions, parking requirements could be established that incentivize local goals such as mass transit from smaller cities into Modesto, or regionally from Stanislaus County to the Bay Area or Sacramento.

Land Use Densities and Designations

The allowable density range of land designated for residential land use is a particularly important government policy that, in combination with local economic conditions, strongly influences a jurisdiction's overall housing unit production. Areas with higher housing unit densities allow developers to take advantage of economies of scale in development which reduces the per-unit cost of land and improvements. This ultimately can reduce overall development costs of housing construction. Lowering the cost of housing through density also increases the feasibility of producing affordable housing.

If allowable residential density is lowered by a jurisdiction, California law requires the local government justify that any density reduction, rezoning, or downzoning that occurs and show that the density reduction is consistent with its General Plan and meeting the RHNA.

California Department of Housing and Community Development assumes housing units built with densities above 20 du/ac are affordable to extremely low-, very low-, and low-income households and encourages zones with this density permitted.

All jurisdictions in Stanislaus County allow higher single-family residential density (6 to 14 du/ac) in some zones as described in their General Plan.

Despite the economic and regulatory incentives for higher density development, all the jurisdictions in Stanislaus County allow for lower density, single-family housing units within areas zoned for higher-density use. Called "pyramid zoning" or "cumulative zoning", this public policy could restrict fair housing choice

by limiting access to and availability of affordable multi-family housing units that otherwise would have been required in this location.

Table 4. Housing Element Status Compliance

Jurisdiction	Document Status	Compliance Status	Date Reviewed
Stanislaus County	Adopted	IN	4/27/2016
Ceres	Adopted	IN	3/15/2016
Modesto	Adopted	IN	4/18/2017
Hughson	Adopted	IN	1/6/2016
Newman	Adopted	IN	8/4/2016
Oakdale	Adopted	IN	7/24/2016
Patterson	Adopted	IN	2/25/2016
Riverbank	Conditional	IN	5/21/2018
Turlock	Adopted	IN	4/25/2016
Waterford	Adopted	IN	12/17/2018

All Stanislaus County jurisdictions (including the Unincorporated County) have Housing Elements that HCD considers in compliance. One housing element (Riverbank) was submitted in May 2018 and is currently under review.

Review of Housing Opportunity

When a jurisdiction's zoning ordinance allows for a diverse range of housing types, a community can actively ensure access to fair housing choice. While this aspect of a zoning ordinance is related to housing density, diversity of housing types helps ensure a mixture of different housing unit sizes, styles, and ownership structures.

Single- and Multi-Family Uses

Single- and multi-family units, which include detached and attached single-family homes, duplexes, townhomes, condominiums, and rental apartments, are generally allowed across residential zones in Stanislaus County. Each jurisdiction's zoning ordinance specifies the zones in which each of these housing types is permitted by right. For areas that require special permits and review, additional costs and processing time can limit housing project developments, especially multifamily developments intended for lower-income households.

Accessory Dwelling Units (ADUs)

Accessory dwelling units (ADUs), also called "secondary dwelling units" or "granny flats" are attached or detached housing units that typically reside on the same property as another unit, such as a single-family home. These units offer independent living facilities for one or more inhabitants, including permanent provisions for living, sleeping, cooking, and sanitation. ADUs can increase dwelling unit density in a neighborhood and increase the abilities of extended families to live together, such as adult children and/or seniors who wish to live near each other yet still desire separate living facilities. In many high-cost

communities, this type of housing also offers a more affordable option for low-income households because they often rent for less than apartments of comparable size. They can also create more affordable homeowner housing by adding to the homeowner's income.

In the State of California, local jurisdictions are required to amend their zoning ordinances to accommodate accessory dwelling units in the community, though a separate ADU ordinance is not required. ADUs units cannot be prohibited in residential zones unless a local jurisdiction justifies the choice in that such action may limit housing opportunities in the region and that the jurisdiction finds that ADUs would adversely affect the public health, safety, and welfare in residential zones. Cities and counties that adopt an ADU ordinance must submit the ordinance to HCD within 60 days for an ordinance review.

The State's ADU law also requires use of a ministerial, rather than discretionary, process for reviewing and approving second dwelling units. A "ministerial process" is a process that can follow set standards like the zoning and building code without needing approval by a commission or board, e.g. a permit to replace a roof approved by a building department. In addition to avoiding a lengthy committee-approval process, a ministerial process is not required to be reviewed under the California Environmental Quality Act (CEQA) which can also add time delays and administrative burden to the building process.

All Stanislaus County jurisdictions allow ADUs within some zones and comply with State law while others are still in the ordinance revision process. Each jurisdiction individually specifies which zones and under what conditions ADUs are permitted within the zoning ordinance. The review process and scope of additional requirements for ADUs, such as parking standards, vary by jurisdiction as well.

Mobile Home Parks & Manufactured Housing

Mobile homes and manufactured housing represent a type of housing that is usually affordable in areas with high housing prices. A "mobile home" is a manufactured home built prior to 1976 when HUD instituted new standards for this type of housing, while "manufactured housing" is similar housing created after this time.

In California, the Manufactured Housing Act of 1980 regulates manufactured housing. (California Health and Safety Code Division 13, Part 2 Section 18000). Mobile or Manufactured Housing residents and owners in California also follow the California Mobile Home Residency Law. (§ 798) Federal laws governing manufactured housing are within Title 42, U.S. Code, Chapter 70, Section 5401.

Most jurisdictions in Stanislaus County permit mobile home parks in at least one residential zone except for Modesto. The communities that allow mobile home parks usually require either a Conditional Use Permit or allow the housing by right in zones designated specifically for mobile home development.

Individual manufactured houses on permanent foundations are allowed in all jurisdictions in at least some residential zones. State law requires local governments to permit manufactured or mobile homes on a permanent foundation that meet federal safety and construction standards in all single-family residential zoning districts (§65852.3).

Table 5. Mobile & Manufactured Home Ordinance Requirements

Jurisdiction	Mobile Home Parks		Manufactured Homes	
	Permitted? (Yes/No)	Review Process	Permitted? (Yes/No)	Review Process
Ceres	Yes	Allowed with a Conditional Use Permit in some residential zones	Yes	Permitted across most residential zones
Hughson	Yes	Allowed with a Conditional Use permit in all residential zones	Yes	Conditional Use permit/Permitted
Modesto	No	Allowed only in Planned Development zones	Yes	Permitted in all residential zones
Newman	Yes	Permitted in Mobile Home Park District	Yes	Permitted in the Mobile Home Park District
Oakdale	Yes	Allowed in multiple residential zones and the review process depends on number of proposed units.	Yes	Permitted in most residential zones
Patterson	Yes	Allowed with a Conditional Use permit in higher density zones (MR and HR)	Yes	Permitted in all residential zones
Riverbank	Yes	Allowed with a Use Permit in all residential zones	Yes	Permitted in all residential zones
Turlock	Yes	Allowed with a Conditional Use Permit in residential zones	Yes	Permitted in lower density residential zones and with a minor discretionary permit in higher density zones
Waterford	Yes	Permitted in Mobile Home Park District	Yes	Permitted in the Mobile Home Park District
Stanislaus County	Yes	Allowed with a Use Permit in all residential zones	Yes	Permitted in all residential zones

Source: Zoning Ordinance for each jurisdiction

Residential Care Facilities

The Lanterman Developmental Disabilities Services Act, passed in California in 1969, is a State law that says that mentally and physically disabled persons and their families are entitled to live in residential surroundings like people without disabilities. It also establishes a process to determine what services are needed for disabled individuals and their families and how those services will be provided. (California Welfare and Institutions Code §4500 – §5121)

The law requires that local zoning allow residential properties used for the care of six or fewer persons with mental health disorders or other disabilities. A state-authorized, certified or licensed family care home, foster home, or group home serving six or fewer persons with disabilities, or dependent and neglected children, on a 24-hour-a-day basis is considered a “residential use” that must be permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes than are required of the other permitted residential uses in the same zone.

According to the California Department of Social Services Community Care Licensing Division, the following definitions of adult and/or senior residential care facilities apply:

- **Adult Residential Facilities (ARF):** Facilities of any capacity that provide 24-hour non-medical care for adults ages 18 through 59 who are unable to provide for their own daily needs. Adults may be physically handicapped, developmentally disabled, and/or mentally disabled.
- **Continuing Care Retirement Community (CCRC):** Long-term continuing care for adults over 60 years old that provides housing, residential services, and nursing care, usually in one location.
- **Residential Care Facilities for the Elderly (RCFE):** Facilities that provide care, supervision and assistance with activities of daily living, such as bathing and grooming. They may also provide incidental medical services under special care plans.

According to public data provided by the California Department of Social Services Community Care Licensing Division, there are 147 state-licensed residential care facilities for adult and senior populations in Stanislaus County, including 86 residential care facilities for the elderly and 61 adult residential facilities. These facilities provide a total of 3,388 beds. Tables 6 and 7 present the number of facilities and beds (facility capacity) by jurisdiction and reveals that, while residential care facilities are located within most areas of Stanislaus County, the majority of beds are located in Modesto and, to a lesser degree, Turlock. Additional beds are concentrated in Hughson, Patterson, and Riverbank.

All jurisdictions allow Residential Care Facilities (with 6 or fewer persons) in at least some residential zones by right. For facilities serving more than six people, all communities accommodate these units in some form in their zoning ordinance. Specifically, all localities allow for larger facilities subject to either a conditional use or development permit in residential and/or commercial zones.

Table 6. Number of Licensed Community Care Residential Facilities by Jurisdiction

	Adult Residential (ARF)	Continuing Care Retirement Community (CCRF)	Residential Care Elderly (RCFE)	Total Facilities
Ceres	2	0	1	3
Empire	2	0	2	4
Hughson	0	0	1	1
Modesto	42	0	56	98
Newman	0	0	1	1
Oakdale	0	0	7	7
Patterson	2	0	1	3
Riverbank	7	0	4	11
Salida	2	0	3	5
Turlock	3	1	9	15
Total	60	1	85	146

Source: California Department of Social Services Community Care Licensing Division

Table 7. Licensed Community Care Facility Capacity (Beds) by Jurisdiction

	Adult Residential Facility (ARF)	Continuing Care Retirement Community (CCRC)	Residential Care Elderly (RCFE)	Total Number of Beds
Ceres	21	0	8	29
Empire	45	0	47	92
Hughson	0	0	277	277
Modesto	502	0	1,299	1,801
Newman	0	0	6	6
Oakdale	0	0	90	90
Patterson	12	0	6	18
Riverbank	98	0	22	120
Salida	10	0	92	102
Turlock	17	377	453	847
Total Capacity	705	377	2,300	3,382

Source: California Department of Social Services Community Care Licensing Division

Table 8. Housing Types Permitted within Residential Zones by Jurisdiction

Housing Type	Ceres	Modesto	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Stanislaus County
Single-Family	P	P	P	P	P	P/C	P	P	P	P
Multi-family	P	P	P	P/C	P/C	P/C	P/C	P	P	P
Residential Care Facilities (6 or fewer persons)	P	P	P/C	P	P	P/C	P	P	P	P
Residential Care Facilities (more than 6 persons)	P	C	C		C	C	C	C	C	C

Source: Zoning Ordinance for each jurisdiction

Key:
P = Permitted
C = Conditional/Special Use Permit
X = Prohibited
(blank) = No mention in Zoning Ordinance

Note that the Lanterman Act only applies to state-licensed residential care facilities. Other facilities, such as transitional and supportive housing, are not covered. California law does require local jurisdictions to include information about these types of non-licensed facilities in their Housing Element in the context of discussing housing for low-income individuals and those with disabilities.

Emergency Shelters

HUD defines an emergency shelter as a facility whose primary purpose is to provide temporary shelter – usually up to six months – and accommodations for individuals experiencing homelessness. These facilities can be operated by government or private nonprofit entities and may serve general homeless populations or specialize assisting a targeted group such as individuals leaving a domestic violence situation, homeless youth, or families with children. In addition to shelter and meals, emergency shelters may offer additional services such as case management, counseling, employment assistance, job training, or transportation.

Under California’s Housing Element laws, jurisdictions must identify and accommodate at least one year-round emergency shelter by right in their zoning ordinance as well as allow shelters in additional zones with a conditional use permit. Furthermore, jurisdictions can only subject emergency shelters to the same development and management standards applicable to residential or commercial developments in the same zone.

In Stanislaus County, all jurisdictions permit emergency shelters in at least one zone. In most cases, cities allow emergency shelters by right in commercial or industrial zones. Most do not permit shelters in residential zones, but those that do often allow emergency shelters in areas zoned for higher density or mixed use. Table 9 depicts permitted types of housing in residential, commercial, and industrial zones by jurisdiction.

Table 9. Specialized Housing and Emergency Shelter Permitted within Residential, Commercial, and Industrial Zones by Jurisdiction.

RESIDENTIAL ZONES: Includes Single-Family Zones, Multi-Family Zones, Mobile Home Park Development Zones, residential zones of different densities										
Housing Type	Ceres	Modesto	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Stanislaus County
Emergency Shelters		X	P		X		P	C	P	
Transitional Housing	P	P	P		P	C	P		P	
Supportive Housing	P	P/C	P		P		P		P	
Single-Room Occupancy	P	P/C	C	C	C		P	P/C	C	
Farmworker Housing	P				P	C	P		P	
COMMERCIAL ZONES: Includes Commercial Planned Development Zones, Recreation Commercial Zones, Mixed-Use Zones, Commercial-Neighborhood Zones										

Housing Type	Ceres	Modesto	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Stanislaus County
Emergency Shelters	X	C	X		P		C	C		P
Transitional Housing		X	X		X		C			
Supportive Housing		X			X		C			
Single-Room Occupancy	C		C		X			P/C		
Farmworker Housing					X					

INDUSTRIAL ZONES: Includes Manufacturing Zones of different levels										
Housing Type	Ceres	Modesto	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Stanislaus County
Emergency Shelters	P	C	C	P	P	P				P
Transitional Housing	X	X	X							
Supportive Housing	X	X	X							
Single-Room Occupancy	X		X							
Farmworker Housing	X		X							

Source: Zoning Ordinance for each jurisdiction. Does not include Agricultural/Open Space or Public Space/Institutional Zones

Key:
P = Permitted
C = Conditional/Special Use Permit
X = Prohibited
(blank) = No mention in Zoning Ordinance

Transitional and Supportive Housing

Transitional housing programs are another form of housing assistance for individuals experiencing homelessness. Oftentimes, transitional housing couples housing accommodations with supportive services such as case management, employment assistance, and health services to help individuals live independently. Program duration varies, although entities that receive funding from HUD typically assist individuals for no more than 24 months. In California, the Housing Element law states that transitional housing includes “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 recipient at a predetermined future point in time that shall be no less than six months from the start of assistance.”¹

Another form of assisted housing, supportive housing, are facilities that offer accommodations and supportive services usually for a specific low-income population such as those with chronic health conditions, mental or physical disabilities, or substance use disorder. Supportive services can be provided either at the same location as the housing unit (on-site) or at a different location (off-site). In general, supportive services aim to assist residents in living independently in their community and can include programs to help achieve better health outcomes, complete daily living activities, and connect to other resources in the area. Supportive housing typically does not impose limits on the duration of assistance, and in California, the state’s Housing Element law defines supportive housing as having no such limitation on a resident’s length of stay.²

The State of California extends legal protection to specific groups protected under the Lanterman Developmental Disabilities Act. These include emancipated minors, families with children, seniors, young adults aging out of the foster care system, individuals exiting an institutional setting, veterans, and the homeless.³ Furthermore, state law considers both transitional and supportive housing as ‘residential uses’ which means that a local jurisdiction cannot subject this type of housing to additional requirements that would not be applicable to other similar residential uses in the same zone. For example, a local government cannot impose supplemental permitting requirements on transitional or supportive housing units when it does not require the same of other, similar housing types in the same zone. Across Stanislaus County, all jurisdictions comply with state law.

Single-Room Occupancy (SRO)

Single-room occupancy (SRO) units, sometimes called lodging, rooming, or boarding units, are one-room units meant for one individual. Unlike an efficiency unit or a studio apartment, SROs are not required to have an independent kitchen or bathroom, however many do. California’s Housing Element law requires that jurisdictions accommodate housing for extremely low-income households, including single-room occupancy units. Across Stanislaus County, most jurisdictions comply with the law by allowing SROs with a conditional use permit in higher-density residential zones.

Farmworker Housing

Farmworker housing refers to housing accommodations provided for farmworkers, day laborers, and other agricultural employees covered by state law. Under California’s Employee Housing Act, jurisdictions must consider housing for six or fewer employees as a residential use and allow this type of housing anywhere single-family units are permitted. (California Health and Safety Code Division 13, Part 1, Section 17000)

For farmworker housing as a specific subset of employee housing, the Act considers housing with 36 beds or 12 units as an agricultural use and to be permitted in zones where other agricultural uses are permitted. Across Stanislaus County, most jurisdictions comply with state law by allowing farmworker housing in areas zoned for agricultural use. Two jurisdictions, Hughson and Modesto, do not explicitly reference farmworker housing in their zoning ordinances but each accommodates this type of housing. Modesto elaborates on its policy in the City’s 2015-2023 Housing Element which explains that farmworker housing

¹ California Code, https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=65582

² Housing Element law, section (g): https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=65582

³ Ibid

“may be developed in any zone where residential uses are permitted.”⁴ Likewise, in its 2019-2023 Housing Element, Hughson explains that farmworker housing can be developed by right in areas zoned for multifamily use and that the City’s zoning ordinance currently needs to be updated to fully comply with state law by permitting farmworker housing in all areas where single-family units are allowed. The City also points out, however, that agricultural uses are not permitted anywhere within city limits, and therefore, the zoning ordinance does not need to permit housing with 36 beds or 12 units as an agricultural use because this state regulation does not apply.⁵

Ceres, Waterford, and Riverbank all additionally permit farmworker housing by right, and Patterson with a conditional use permit, in at least some residential zones.

Affordable Housing Development Policies and Programs

Minority and special needs households are disproportionately affected by a lack of adequate and affordable housing in the region. While affordability issues are not directly fair housing issues, expanding access to housing choice for these groups cannot ignore that affordability is a significant issue for many households. When rent-restricted or non-restricted low-cost housing is concentrated in certain geographic locations, access to housing by lower-income and minority groups in other areas can be limited and therefore an indirect impediment to fair housing choice. Furthermore, various permit processing and development impact fees charged by local government can result in increased housing costs and therefore be a barrier to the development of affordable housing. Other policies and programs, such as inclusionary housing and growth management programs, can either facilitate or inhibit the production of affordable housing.

Because land-use policies influence the development and spectrum of available housing in a community, the intensity and scope of different policies can be a useful indicator for impediments to fair housing choice.

⁴ Page 3-11, <https://www.modestogov.com/DocumentCenter/View/7025/Chapter-3-Constraints-PDF>.

⁵ Page 56, http://hughson.org/wp-content/uploads/2019/03/HughHE_Adopted_2015-12-21.pdf

Table 10. Growth Management and Inclusionary Zoning Policies

Jurisdiction	Growth Management Plan	Inclusionary Zoning Policy
Ceres	Ceres has policies that guide growth but it doesn't have any policies that impose limits on development each year	Does not appear to have an inclusionary program
Hughson	General Plan mentions wanting direct and focus growth towards development of the Primary SOI to "ensure an appropriate rate of growth" and "preserve Hughson's existing small-town character"; part of this plan involves focuses on infill development	2015-2023 Housing Element states that Hughson is continuing to "evaluate developing an inclusionary zoning program"
Modesto	Modesto has a Community Growth Strategy that outlines different policies for specific geographic areas	Modesto has considered implementing inclusionary programs in the past and has deemed such program infeasible
Newman	City states that it promotes development of housing at a balanced mix of housing types while "protecting the single-family character of neighborhoods" Newman also has maximum allowable densities for the number of units per acre	City does not appear to have an inclusionary program
Oakdale	City identifies growth and revitalization areas to direct development and protects rural areas from growth; explicitly links job growth to housing growth; follows the "San Joaquin Valley Blueprint Smart Growth Principles"	City does not appear to have an inclusionary program
Patterson		Inclusionary Housing Program: Chapter 18.86 of City Code
Riverbank	City has an 'unrestricted growth policy'	Does not appear to have an inclusionary program
Turlock	City has a "New Growth Areas and Infrastructure Element that guides its growth management strategy; part of the strategy involves creating master plans for designated areas	Does not appear to have an inclusionary program
Waterford	City does not appear to have growth policies that limit development	Does not appear to have an inclusionary program
Stanislaus County	Voters approved Measure E in 2008 which requires majority approval to rezone/re-designate land; County is committed to preserving agricultural lands	County doesn't appear to have an inclusionary program

Sources: Zoning Ordinance for each jurisdiction

Growth Management Policies

Growth management policies aim to control the progression and speed of development, balancing the needs of a community's existing residents while preparing for the community's future. Growth management policies can become impediments to housing choice, however, when the policy hinders the jurisdiction meeting local affordable housing needs. Growth management policies are not usually condensed within a single policy or program but exist within a collection of codes, plans, or ordinances that direct the rate and intensity of new development.

Urban growth boundaries (the outermost extent of anticipated urban development), limits on the total number of dwelling units that may be permitted, or special conditions on new development can all be considered growth management policies. State housing law mandates a jurisdiction facilitate the development of a variety of housing to meet the jurisdiction's fair share of regional housing needs. Any growth management measure that compromise a jurisdiction's ability to meet its regional housing needs may have an exclusionary effect of limiting housing choices.

Local jurisdictions within Stanislaus County have various local policies and voter initiatives that may impact housing development directly and indirectly including those that aim to support the conservation of agricultural land. Agriculture is the area's number one industry for economic output and employment, creating a multiplier effect for job creation. The conservation of agricultural land is important to the overall economic health of the community but must be balanced with the needs for housing to support the local workforce in all economic sectors of the community. Over time, as available land not impacted by growth measures begins to decline, there may be a direct impact on the development of affordable housing. However, changes in state laws regarding vehicle miles traveled and greenhouse gas reduction requirements, and the increasing costs of extending infrastructure outward, have led to many jurisdictions looking for increased infill development opportunities. Grant funding available for infrastructure, such as sewer and water line extensions and improvements, allows jurisdictions to increase their density within existing urbanized areas.

Inclusionary Housing Programs

Inclusionary housing or inclusionary housing policies increase the supply of affordable housing by requiring developers to set aside a certain number of new housing units for low- and moderate-income households. These policies ensure that at least a share of new housing in a community is affordable for lower-income populations. The policy tends to be most effective in areas experiencing rapid and a strong demand for housing.

A typical inclusionary housing program will require developers to set aside anywhere from 10 to 30 percent of new housing units for low- and moderate-income households. These policies and programs can be either voluntary or mandatory. Voluntary programs often require developers to negotiate with public officials, but do not specifically mandate the provision of affordable units. Mandatory programs are usually codified in the zoning ordinance and require a contract with the jurisdiction for the creation of the housing units prior to obtaining a building permit.

In 2017, Assembly Bill 1505 was passed by the state legislature to allow cities and counties to adopt inclusionary housing ordinances after a period of legal uncertainty since 2009. The bill was signed into law January 1, 2018. (§ 65850.01) Patterson is the first city in Stanislaus County have an inclusionary housing ordinance. (Chapter 18.86 City Code) Hughson notes in their 2015-2013 that the City is continuing to "evaluate developing an inclusionary zoning program". In the 2009-2014 City of Modesto Housing Element, an inclusionary housing element was deemed infeasible.

The rental housing market conditions may create the incentive for these types of policies in the future if housing costs continue to increase.

Affordable Housing Development

HUD Funding and Tax Credits

Housing with HUD funding to create income-restricted units are found throughout Stanislaus County. About half of these units are in Modesto with many units in both Ceres and Turlock. Modesto's HUD-funded affordable housing stock makes up more than 70 percent of the affordable housing in the County.

While HUD subsidized units are one source of funding for affordable housing units, affordable housing units developed without HUD funding also help the jurisdiction meet lower income housing requirements of the Housing Element. Low-Income Housing Tax Credits (LIHTC), general funds, and state housing funds are also used to develop affordable units. Stanislaus County's recent housing production using LIHTC, however, is low compared to the rest of the state. In 2016-2018, only 55 low-income housing units were created in the County compared to 18,803 in the rest of the State. Table 11 presents the number of affordable housing units with HUD funding by jurisdiction. In this table, 'affordable housing' includes all HUD-subsidized units including public housing and various types of tenant-based and project-based rental assistance. Table 12 includes affordable housing units subsidized by LIHTC.

Table 11. Affordable Housing Units with HUD Funding by Jurisdiction

Jurisdiction	Affordable Units (2018)	Total Occupied Rental Housing Units (2018)	Total Housing Units (2018)	Percent of Housing Stock Affordable	Percent of All Affordable Units in County
Ceres	748	589	13,636	5.5%	11.9%
Hughson	47	45	2,461	1.9%	0.7%
Modesto	4,470	3,712	75,155	5.9%	70.9%
Newman	126	113	3,289	3.8%	2.0%
Oakdale	151	148	8,249	1.8%	2.4%
Patterson	79	75	6,100	1.3%	1.3%
Riverbank	154	146	7,449	2.1%	2.4%
Turlock	1,202	1,146	25,974	4.6%	19.1%
Waterford	63	62	2,579	2.4%	1.0%
Stanislaus County Total	6,302	6,050	180,755	3.5%	100.0%

Sources: 2018 HUD Picture of Subsidized Housing data; DP04, Selected Housing Characteristics, ACS 5-year estimates (2013-2017)

*Affordable units in this table include all HUD-subsidized units including public housing, Housing Choice Vouchers, Mod Rehab, project-based Section 8 units, Rent Sup/RAP, and Section 202, 236, and 211 properties.

Table 12. Affordable Housing Units with Low-Income Housing Tax Credit (LIHTC) Funding by Jurisdiction 2002-2017

	Total Number of LIHTC Units:	Total Low-Income LIHTC Units:
Ceres	235	231
Modesto	76	75
Newman	120	118
Oakdale	174	171
Patterson	40	39
Riverbank	152	148
Turlock	228	204
Waterford	950	50
Total	1,075	1,036

Source: HUD Low-Income Housing Tax Credit Database 2002-2017

Regional Housing Needs

As part of California's housing element law, the Stanislaus Council of Governments (StanCOG) creates a Regional Housing Needs Assessment (RHNA) to determine future housing needs for the area for residents in different income categories (very low, low, moderate, and above moderate). This assessment quantifies the housing needs for each jurisdiction in the County which guides local government land-use planning and resource prioritization during the General Plan Housing Element update every eight years. ~~Modesto additionally completes an update four years into the planning cycle.~~

Overall, the California Department of Housing and Community Development (HCD) determined a final RHNA of 21,330 housing units needed in Stanislaus County for the planning period of January 1, 2014 to September 30, 2023 (the 5th RHNA Cycle). StanCOG, with consultation from the Valley Vision Stanislaus Steering Committee, then created the RHNA allocation per jurisdiction for each income group. Table 13 includes the RHNA allocation by income category for jurisdictions in Stanislaus County and Table 14 presents the progress of each jurisdiction in meeting their respective allocation. Table 15 summarizes the RHNA allocation by jurisdiction and income level.

Table 13. RHNA Allocation of Affordable Housing Units

Jurisdiction	Income Category				
	Very Low	Low	Mod	Above Mod	TOTAL
Ceres	622	399	446	1104	2,571
Hughson	53	34	38	93	218
Modesto	1,462*	1,461	1,100	2,724	6,747
Newman	186	119	136	337	778
Oakdale	315	202	210	520	1,247
Patterson	636	408	416	1031	2,491
Riverbank	321	206	217	536	1,280
Turlock	877	562	627	1552	3,618
Waterford	131	84	89	221	525
Unincorporated County	538	345	391	967	2,241
Total County	5,141	3,820	3,670	9,085	21,716

* Per Housing Element (includes Extremely Low & Very Low)

Source: California Housing and Community Development (HCD)

Table 14. RHNA Progress Report 2014-2017

JURISDICTION	Fees for Very Low-Income Housing	Total Number of Very Low-Income Housing Units Permitted	Percentage of Very Low Income RHNA complete.	RHNA for Low Income Housing	Total Number of Low Income Housing Units Permitted	Percentage of Low Income RHNA complete.
	VLI RHNA	VLI PERMITS	VLI % COMPLETE	LI RHNA	LI PERMITS	LI % COMPLETE
Ceres	622	0	0.0%	399	0	0.0%
Hughson	53	0	0.0%	34	0	0.0%
Modesto	1,546	0	0.0%	991	56	5.7%
Newman	186	0	0.0%	119	0	0.0%
Oakdale	315	0	0.0%	202	1	0.5%
Patterson	636	0	0.0%	408	0	0.0%
Riverbank	321	33	10.3%	206	38	18.4%
Turlock	877	2	0.2%	562	123	21.9%
Unincorporated County	538	0	0.0%	345	16	4.6%
Waterford	131	0	0.0%	84	0	0.0%

Jurisdiction	RHNA for Moderate Income Housing	Total Number of Moderate-Income Housing Units Permitted	Percentage of Moderate Income RHNA complete.	RHNA for Above Moderate-Income Housing	Total Number of Above Moderate-Income Housing Units Permitted	Percentage of Above Moderate Income RHNA complete.
	MOD RHNA	MOD PERMITS	MOD % COMPLETE	ABOVE MOD RHNA	ABOVE MOD PERMITS	ABOVE MOD % COMPLETE
Ceres	446	5	1.1%	1,104	0	0.0%
Hughson	38	0	0.0%	93	71	76.3%
Modesto	1,100	146	13.3%	2,724	425	15.6%
Newman	136	0	0.0%	337	0	0.0%
Oakdale	210	84	40.0%	520	254	48.8%
Patterson	416	0	0.0%	1,031	0	0.0%
Riverbank	217	0	0.0%	536	103	19.2%
Turlock	627	591	94.3%	1,552	46	3.0%
Unincorporated County	391	44	11.3%	967	425	44.0%
Waterford	89	0	0.0%	221	8	3.6%

Source: California Housing and Community Development (HCD)

Table 14 suggests that progress in meeting these housing goals has been slow, particularly for very low-income housing units. For the first three years of the eight-year 5th plan, only Riverbank has issued building permits for more than one percent of their housing goal. For low-income units, Modesto, Riverbank, Turlock, and the Unincorporated County made progress creating units.

Turlock made significant progress in meeting its moderate-income housing goals. In three years, the City has permitted 94.3 percent of its eight-year housing goal of 627 units in this income category. Oakdale is also on track to meet its housing goal, permitting 84 of 210 units (40 percent) in three years. Ceres, Modesto, and the Unincorporated County also saw progress toward meeting their moderate-income housing goals. In total 870 moderate-income housing units were permitted countywide in the first three years of the 5th RHNA Cycle.

Most housing units created have been in the above moderate-income category, with 1,332 permits issued for housing in this income category. Hughson permitted 71 above moderate-income housing units, more than three-quarters of its housing goal. Oakdale and the Unincorporated County were also making significant progress in this category at 48.8 and 44.0 percent, respectively. Modesto only permitted 15.6 percent of its above moderate-income housing unit goals, but this amounts to 425 units. Riverbank, Turlock, and Waterford all permitted housing in this income category as well.

Table 15. RHNA Totals

JURISDICTION	Combined total RHNA for all income categories	Total permits from all income categories.	Sum of total remaining from each income category.
	RHNA TOTAL	TOTAL PERMITS	TOTAL RHNA REMAIN
Ceres	2,571	5	2566
Hughson	218	71	147
Modesto	6,361	627	5734
Newman	778	0	778
Oakdale	1,247	339	908
Patterson	2,491	0	2491
Riverbank	1,280	174	1106
Turlock	3,618	762	2856
Unincorporated County	2,241	485	1756
Waterford	525	8	517
Total	21,330	2,471	18,859

Source: California Housing and Community Development (HDC) Housing Element Implementation Tracker, Updated 06/25/2019

Other Policies and Programs Impacting Housing Choice

Building Codes

Building codes, such as the California Building Standards Code and the Uniform Housing Code, protect the health, safety, and welfare of the public. Additional building restrictions within local building codes may not be warranted, however, and deter housing construction or neighborhood improvement.

The California Building Standards Code is published every three years by order of the California legislature and applies to all jurisdictions in the State of California unless otherwise annotated. Adoption of the compilation of codes by local government is both a legal mandate and a best practice because it ensures a high level of safety for citizens regarding construction and maintenance of structures. The most recent edition of the California Building Standards Code was updated in 2019 and became effective January 1, 2020.

Other codes commonly adopted across California include the California Mechanical Code, California Plumbing Code, California or National Electric Code, Uniform Housing Code, and California Fire Code.

California Environmental Quality Act (CEQA)

While not directly intended to impact housing choice, the California Environmental Quality Act (CEQA), signed into law in 1970, is a statewide law that applies to all discretionary projects proposed to be conducted or approved by a public agency. The primary purpose of CEQA is to disclose significant environmental effects of a proposed project to the public and to limit these impacts when possible. CEQA also requires that public agencies publicly disclose the decision-making process behind project approval for the purpose of public participation in the environmental review process.

CEQA has been updated several times between 2011 and 2019 to streamline infill development and update exemptions to transit-oriented and mixed-use development, among other updates. Affordable Housing in urban areas is also exempt under certain circumstances. (14 CCR § 15194)

Public Housing Authorities

In Stanislaus County, public housing needs, housing choice vouchers, and other specific HUD funds and services are addressed by two housing authorities:

- The Stanislaus Regional Housing Authority, serving Alpine, Amador, Calaveras, Inyo, Mariposa, Mono, Stanislaus, and Tuolumne Counties. (SRHA)
- The Riverbank Housing Authority administered by SRHA.

Public housing sites can range from large apartment buildings to single-family houses. Housing Choice Vouchers (HCV, also often called the “Section 8” program) are a portable rent subsidy that can be used to pay for a portion of rent in private rental housing units. Project-Based Section 8 vouchers are private rental units in which the current occupant receives subsidized rent through the housing authority.

Housing Authorities are subject to the same state and federal fair housing laws as other housing providers and cannot discriminate on the basis of state or federally protected classes. Housing Authorities must also follow any local fair housing ordinances and may have additional tenant protections added by HUD.

Public Housing Authority Planning

Collectively, the housing authorities in Stanislaus County provide access to 6,335 subsidized housing units including 736 public housing units, 1,060 project-based Section 8 units, and 4,460 housing choice vouchers, though these totals vary at any given time. Though there are technically two housing authorities, the SRHA administers the programs of both the SRHA and Riverbank housing authorities.

The SRHA has been designated as a “high performing” public housing authority by HUD since 2008. This designation is given to public housing authorities (PHAs) that score above a 90 out of 100 points. PHA projects are assessed based on a physical inspection (40 points), financial condition (25 points), management system (25 points), and timely use of capital funds (10 points). The total PHA score is then created out of the average score for all projects weighted by the number of units.

Like many public housing authorities across the country, the housing authorities in Stanislaus County lack an adequate supply of funding for units and/or vouchers to meet the affordable housing needs within their service areas. This is reflected by long or closed waiting lists for potential units. In Stanislaus County, the average waiting time for a public housing unit is 10 years. Waiting lists for housing choice vouchers are only open occasionally and, even then, sometimes only for select applicants.

PHAs complete both an annual plan and a 5-year plan to help prioritize projects, development, funding, and programs. For 2019-2023, the SRHA listed the following goals and objectives (among others) that help affirmatively further fair housing and increase housing choice:

- I. Depending on the availability of federal and state funding, increase the inventory of affordable rental housing within the jurisdiction of the Stanislaus Regional Housing Authority for extremely low to moderate income households

Objectives:

- Housing Choice Voucher Program – Continue to expand upon existing marketing and outreach efforts to attract new landlord participants to the Housing Choice Voucher Program.

- Development – Leverage private or other public funds to create additional housing opportunities.
- Development – Subject to the availability of funding, develop or acquire 500 affordable housing units over the next five years.

2. Conserve and upgrade the Affordable Housing Inventory in Stanislaus County.

Objectives:

- Public Housing – Implement Asset-Based Community Development (ABCD) initiatives to engage and unite residents, associations, and institutions from within each community for more sustainable communities and economic development.
- Administration – Partner with County and/or City in efforts to improve housing stock and create stable, viable neighborhoods.

3. Increase assisted housing choices.

Objectives:

- Housing Choice Voucher Program – Provide voucher mobility counseling at initial family briefings and during annual reexaminations.
- Housing Choice Voucher Program – Continue to maintain the 2-tiered Benefit Payment Standard (BPS) to ensure families have the ability to locate affordable housing in less poverty concentrated neighborhoods.
- Housing Choice Voucher Program - Continue to seek funding for the Individual Development & Empowerment Accounts (IDEA) and Workforce Initiative Subsidy for Homeownership (WISH) programs for graduating Family Self-Sufficiency (FSS) Program Participants.

(Housing Authority of the County of Stanislaus, DBA Stanislaus Regional Housing Authority Streamlined Annual PHA Plan Fiscal Years 2019-2020)

Public Housing Authority Resident Demographics

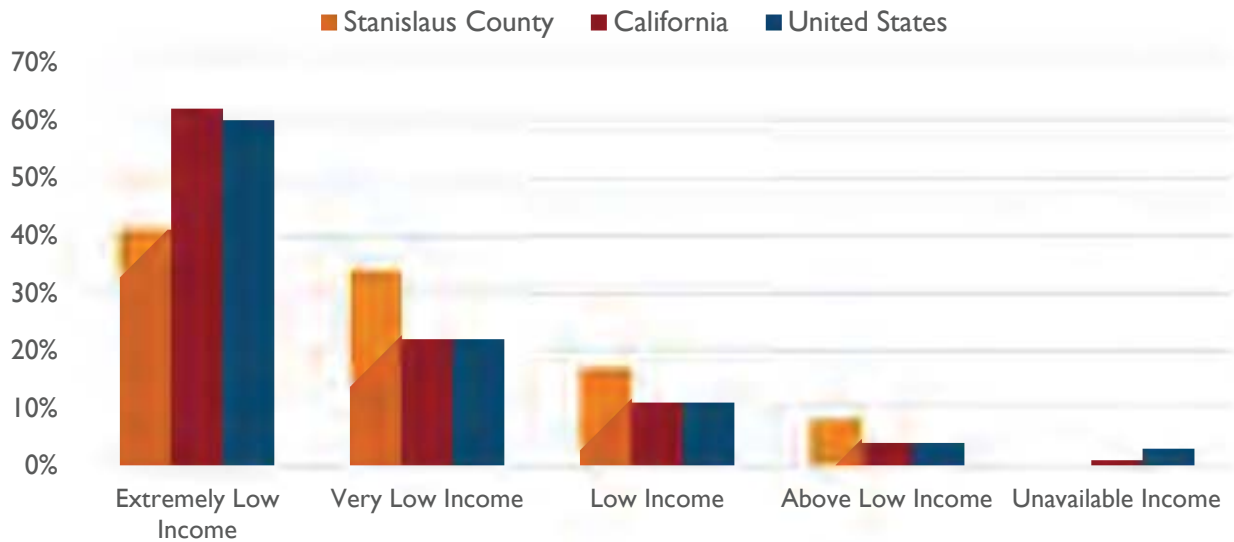
Between October 1st, 2018 and January 31st, 2020, 702 households in Stanislaus County were assisted through public housing, representing 3.9 percent of all public housing households in California.

Chart 35 depicts the share of public housing households by income level in Stanislaus County, California, and the United States. About 40 percent of all public housing residents assisted by the PHAs are considered “extremely low-income”, with a County annual household income average of \$23,825. Chart 36 indicates that Stanislaus County public housing residents have a slightly higher average income than the rest of the state. In California, 62 percent are extremely low income and the annual household average income is \$20,664. The higher income within Stanislaus County is at least partially offset by higher tenant rent contributions than the California average. Chart 37 depicts the average monthly tenant payment for public housing residents in Stanislaus County, California, and the United States. More public housing households pay more than \$501 per month than any other payment category. The average monthly tenant contribution toward rent in Stanislaus County is \$573, versus \$495 in California.

Chart 38 presents the share of public housing household types in Stanislaus County, California, and the United States. The most common household type within public housing is female-headed households with children, with even more households within this category in both California and Stanislaus County than the rest of the United States. Stanislaus County also has a slightly higher percentage of disabled elderly

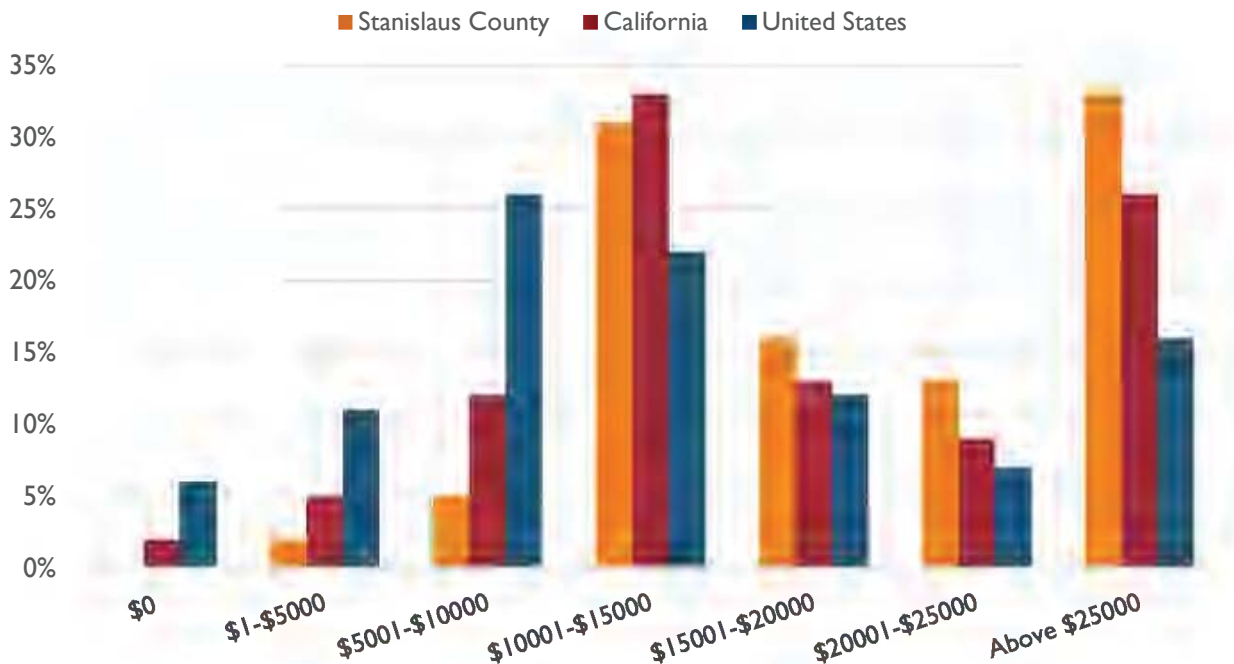
residents (with or without children) than the rest of the state and country. Households in Stanislaus County public housing tend to be larger than those in the rest of California and the United States.

Chart 35. Public Housing Households by Income Level



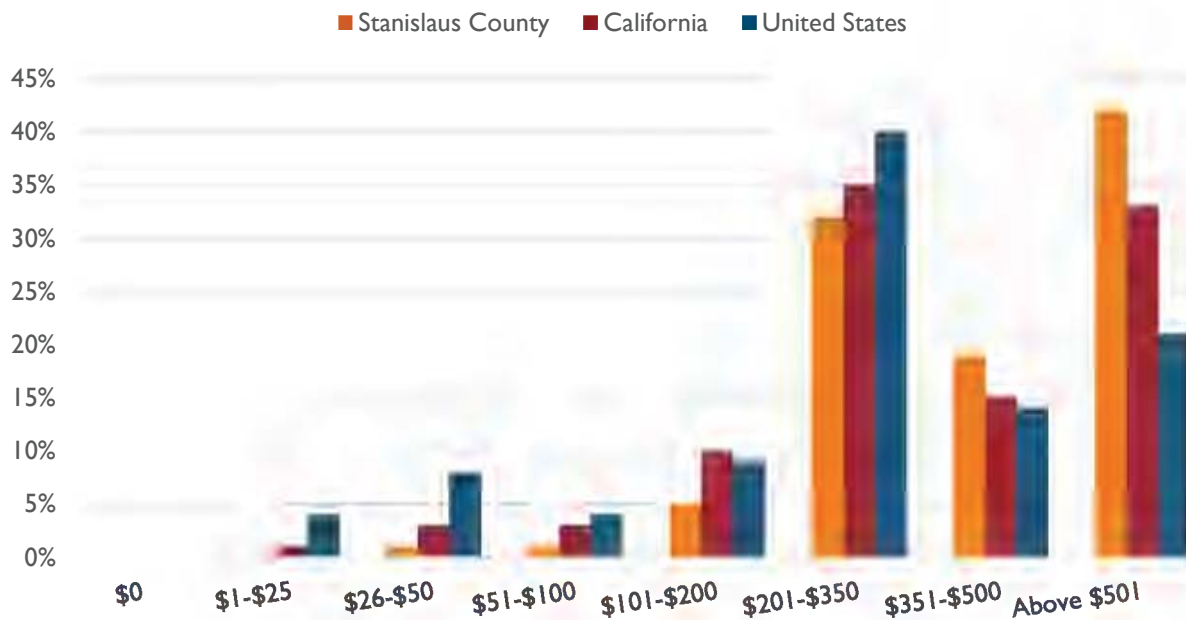
Source: HUD Public and Indian Housing, Resident Characteristics Report as of January 31, 2020

Chart 36. Distribution Annual Household Income



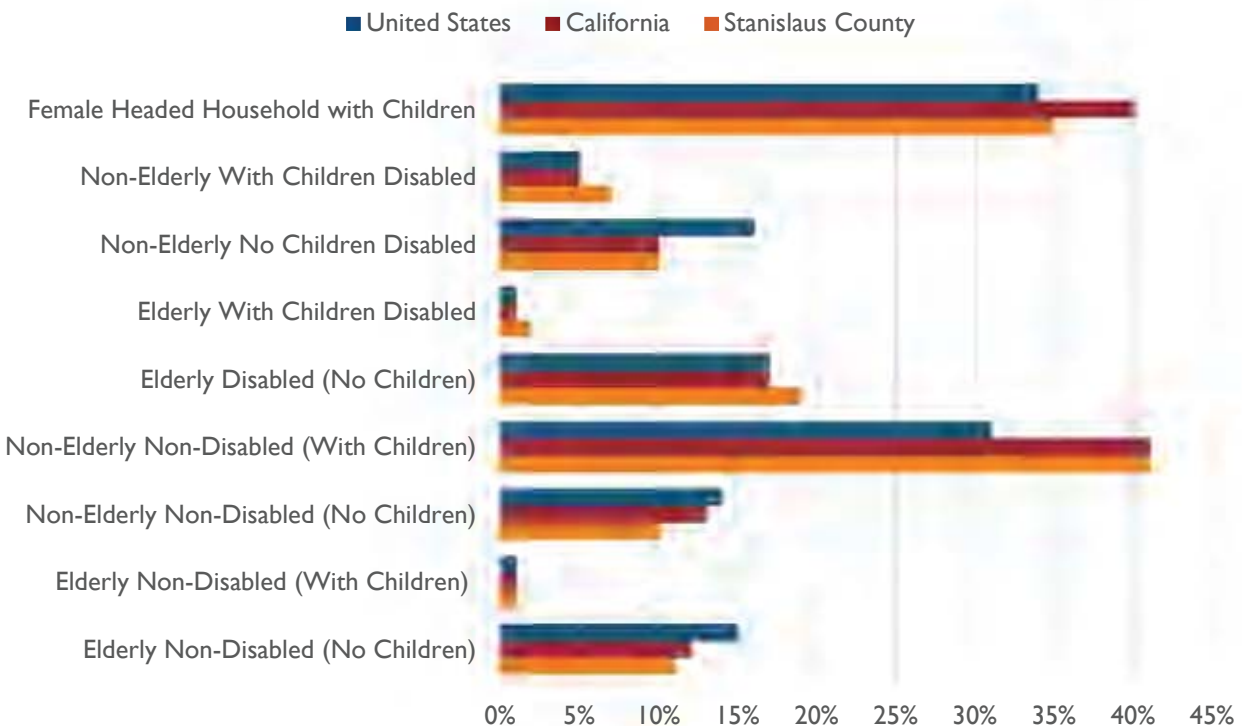
Source: HUD Public and Indian Housing, Resident Characteristics Report as of January 31, 2020

Chart 37. Distribution of Monthly Total Tenant Payment



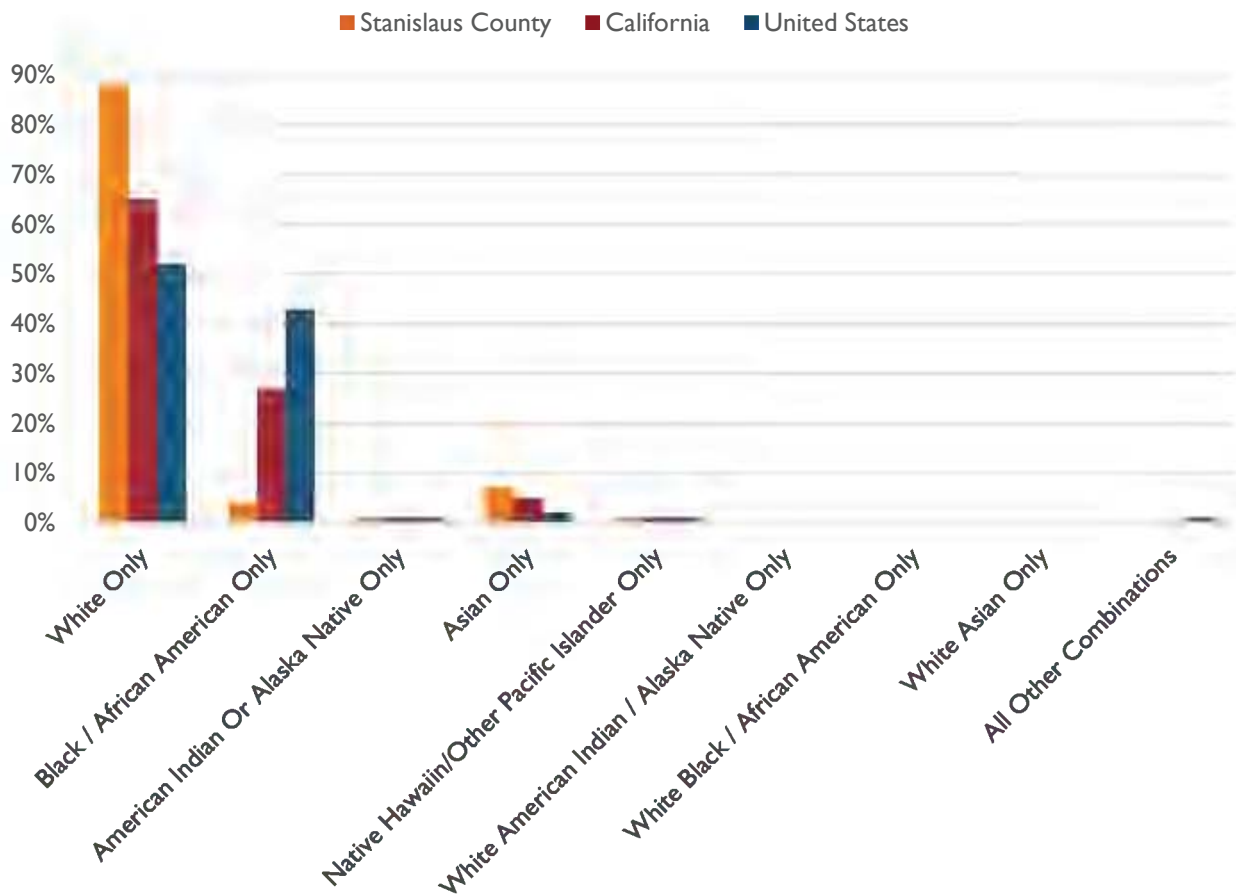
Source: HUD Public and Indian Housing, Resident Characteristics Report as of January 31, 2020

Chart 38. Distribution of Public Housing Household Type in Unit



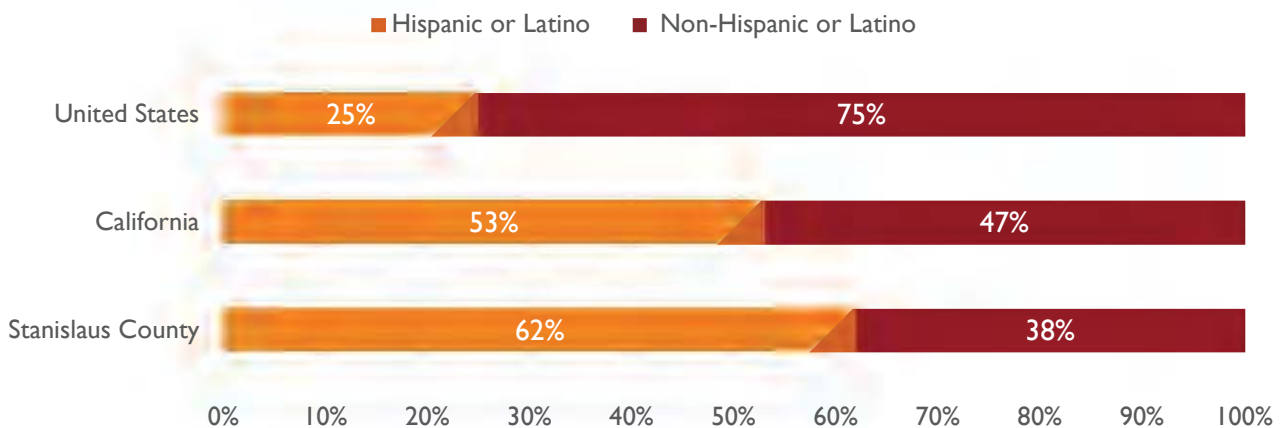
Source: HUD Public and Indian Housing, Resident Characteristics Report as of January 31, 2020

Chart 39. Distribution of Race of Head of Household – Public Housing



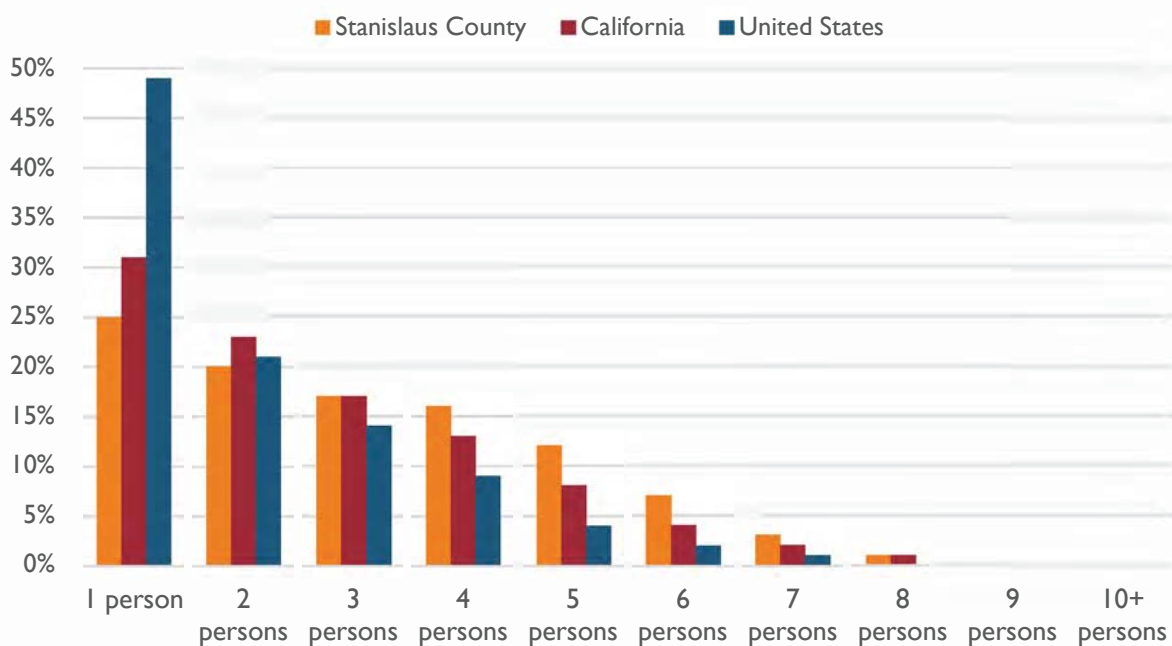
Source: HUD Public and Indian Housing, Resident Characteristics Report as of January 31, 2020

Chart 40. Distribution of Ethnicity of Head of Household – Public Housing



Source: HUD Public and Indian Housing, Resident Characteristics Report as of January 31, 2020

Chart 41. Distribution by Household Size in Public Housing



Source: HUD Public and Indian Housing, Resident Characteristics Report as of January 31, 2020

Appointed Boards/ Commissions

Department of Fair Employment and Housing

California's Department of Fair Employment and Housing (DFEH) enforces California's civil rights laws including fair housing laws found in the Fair Employment and Housing Act (FEHA), Unruh Civil Rights Act, Disabled Persons Act, and Ralph Civil Rights Act. The DFEH is tasked with the following:

- Engage in public outreach and provide training and technical assistance to employers, business establishments, and housing providers regarding their responsibilities under the law.
- Investigate discrimination complaints and cases of systemic discrimination.
- Facilitate mediation and resolution of disputes involving civil rights.
- Enforce the laws by prosecuting violations in civil court.

Within DFEH, the Fair Employment and Housing Council (FEHC) implements California's employment and housing anti-discrimination regulations, conducts inquiries, and holds hearings on civil rights issues. Council members on the FEHC are appointed by the governor.

Local Boards/Committees

Modesto, Turlock, and Stanislaus County all have committees, commissions, or local boards that discuss issues related to Fair Housing and Affirmatively Furthering Fair Housing. Table 16 outlines which jurisdictions in the County have committees that directly address low-income housing, issues of concern for specific racial or ethnic groups, or disability. Hughson, Newman, Patterson, Riverbank, and Waterford do not appear to have any such committees or commissions.

Table 16. Stanislaus County Local & County Boards and Committees

Jurisdiction	Committees/ Commissions	Duration/Frequency	Committee Purpose
Ceres	Housing Loan Committee	Meets as needed	Makes recommendations on down payment assistance loans.
Modesto	Equal Opportunity/Disability Commission - Human Relations Commission (meet jointly)	Meets as needed	Tasked with advising and assisting the City Manager in matters related to equal opportunity and individuals with disabilities; primary responsibility is making recommendations for furthering human relations in the community and make referrals concerning fair housing.
Modesto	Disability Access Appeals Board	Meets as needed	The Disabled Access Appeals Board hears and rules on appeals of Chief Building Official orders based on disabled access laws; and interprets and advises staff on disabled access laws.
Modesto	Citizens Housing & Community Development Committee	Second Thursday of every month	Review City's HUD funds and makes recommendations to City Council on CDBG, HOME, and ESG grants.
Modesto	Housing Rehabilitation Loan Committee	First Thursday of every month	Make recommendations to the Citizens Housing & Community Development Committee on how procedures and policies for housing rehabilitation loan funds and down payment assistance.
Oakdale	Housing Loan Committee	Meets as needed	Make recommendations to the Committee on down payment assistance and housing rehabilitation loan funds
Turlock	Joint Taskforce on Diversity and Inclusion (CTSS-JTDI) (City of Turlock and California State University - Stanislaus)	One a month on a Wednesday	Goal of building relationships between the City, Stanislaus State University, and the community to coordinate, encourage, and implement initiatives to promote an inclusive community.
Turlock	Housing Loan Committee	As needed	Make recommendations to the Committee on procedures and policies for housing rehabilitation loan funds and down payment assistance.
Stanislaus County	Stanislaus County Equal Rights Commission	Every other month on the third Wednesday	Primarily work on promoting equal rights in employment opportunities.

Stanislaus County	Cultural Competency, Equity, and Social Justice Committee (CCESJC) of the Stanislaus County Department of Behavioral Health and Recovery Services	Second Monday of each month	Aim to provide culturally competent services to clients' works with several partners and offer mental health training to public.
County-wide	Stanislaus Community System of Care (CSOC aka CoC)	Third Thursday of each month	Works to address potential issues and gaps in the service delivery system and create a transparent and collaborative service delivery system for the entire County related to housing and homelessness.
County-wide	Stanislaus Homeless Alliance	Second Wednesday of each month	A collaborative entity formed to align homelessness services, planning, and funding among stakeholders in Stanislaus County.

Language Accommodations

National origin discrimination does not directly include the use of language from a foreign country, but, because of the connection between language and foreign geographic areas, HUD has issued guidance clarifying that discrimination against people who do not speak, read, or write English proficiently (with “Limited English Proficiency” or “LEP”) is prohibited under the Fair Housing Act.

HUD notes that in the United States, 34 percent of people who are Asian and 32 percent of people who are Hispanic or Latino are LEP compared to only 2 percent of non-Hispanic Whites. For those born outside the United States, 61 percent born in Latin America and 46 percent born in Asia are LEP. Because language and national origin correlate so closely, a housing applicant or resident’s lack of English proficiency is often used as justification for housing discrimination as a stand-in for discrimination based on race, ethnicity, and/or national origin. (Office of General Counsel Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency, September 15, 2016)

This connection between LEP and national origin was made by the U.S. Supreme Court in 1974 in *Lau v. Nichols* who determined that language was an aspect of national origin and therefore protected by Title VI of the Civil Rights Act which prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. (414 U.S. 563 1974) In addition, LEP Executive Order (Executive Order 13166) signed into law in 2000 gives LEP residents access to federally conducted and federally funded programs and activities. The LEP Executive Order applies to both federal agencies, including HUD, and those who receive federal funds such as local governments and nonprofits. If an organization or their activities are at least partially funded by federal dollars, all the funding recipient's operations are covered by the law, even if only one part of the recipient’s programs or activities and funded by federal assistance. (Limited English Proficiency Federal Interagency Website, LEP.gov)

California law additionally protect those with LEP statewide through protections based on “ethnic group identification” which includes the definition of this protected class as including “linguistic characteristics”. This law applies to any program that is “conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state.” (§ 11135) The Dymally-Alatorre Bilingual Services Act also protects LEP residents of California by requiring that state and local government agencies serving an area with a “substantial number of non-English-speaking people” be able to effectively communicate with those LEP persons through bilingual staff and translated materials. For local and state government agencies, this applies to agencies where the population served is at least 5 percent LEP. The communication covered under the Act includes forms, applications, questionnaires, advertisements, and official notices. (§§7290-7299.8)

A “LEP household” is defined by the U.S. Census Bureau's American Community Survey as those in which no one 14 and over either 1) speaks English at home or 2) speaks a language other than English at home and speaks English 'very well'. In Stanislaus County, 8.9 percent of all households are LEP, and 6.4 percent in Modesto.

Where Dymally-Alatorre applies in Stanislaus County based on LEP demographic percentages, jurisdictions should be able to effectively communicate with the public in English and Spanish in all housing, fair housing, and all other community services and programs to ensure equal access for LEP persons.

EVIDENCE OF HOUSING DISCRIMINATION

Fair Housing Complaints

In California, the Department of Fair Employment and Housing (DFEH) is responsible for enforcing fair housing laws along with the HUD Office of Fair Housing and Equal Opportunity (HUD FHEO). Residents of Stanislaus County who feel they have been a victim of housing discrimination can submit their complaint to either agency. If a complaint is filed with the national FHEO, it will automatically be filed with DFEH at the state level for investigation. If a complaint is filed with DFEH and may also violate the federal Fair Housing Act, DFEH will automatically file the complaint with HUD FHEO as well, although DFEH will be the agency that investigates the allegation.

HUD FHEO and DFEH also partner with state and local agencies in HUD's Fair Housing Assistance Program to report fair housing complaints on behalf of individuals. Member agencies assist individuals in filing fair housing violation complaints with state and national agencies. Fair Housing Assistance Program agencies also conduct housing enforcement activities including compliant investigation, conciliation between parties, and fair housing education and outreach. In Stanislaus County, Project Sentinel is the primary organization that performs these roles in the community in addition to also working with broad tenant and landlord issues.

Project Sentinel investigates complaints on behalf of residents who feel they may be victims of housing discrimination, provides outreach and education to housing providers, and assists residents file complaints with state and federal enforcement agencies such as DFEH and HUD FHEO.

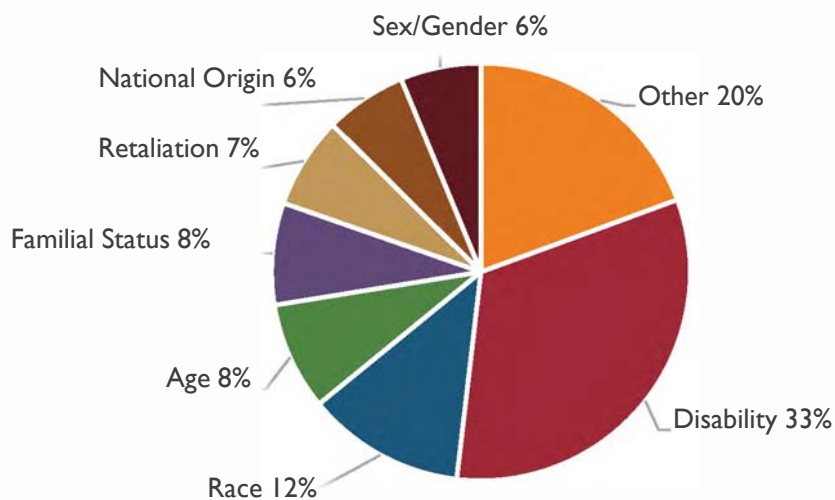
Housing Discrimination Complaints

Information about housing discrimination complaints to DFEH and HUD is tracked annually by each agency. The agency tracks where the alleged fair housing violation occurred geographically, on what protected-class basis, and the date of the complaint.

The true number of fair housing violations that occur within an area is difficult to determine, especially for those who fear retaliation and/or the loss of immediate housing if the violation is reported. This is often, unfortunately, the same group most likely to experience fair housing violations: low-income residents, those with families, racial and ethnic minorities, and those without housing references or good credit. The National Fair Housing Alliance estimates that, on a national level, less than 1 percent of all fair housing violations are reported.

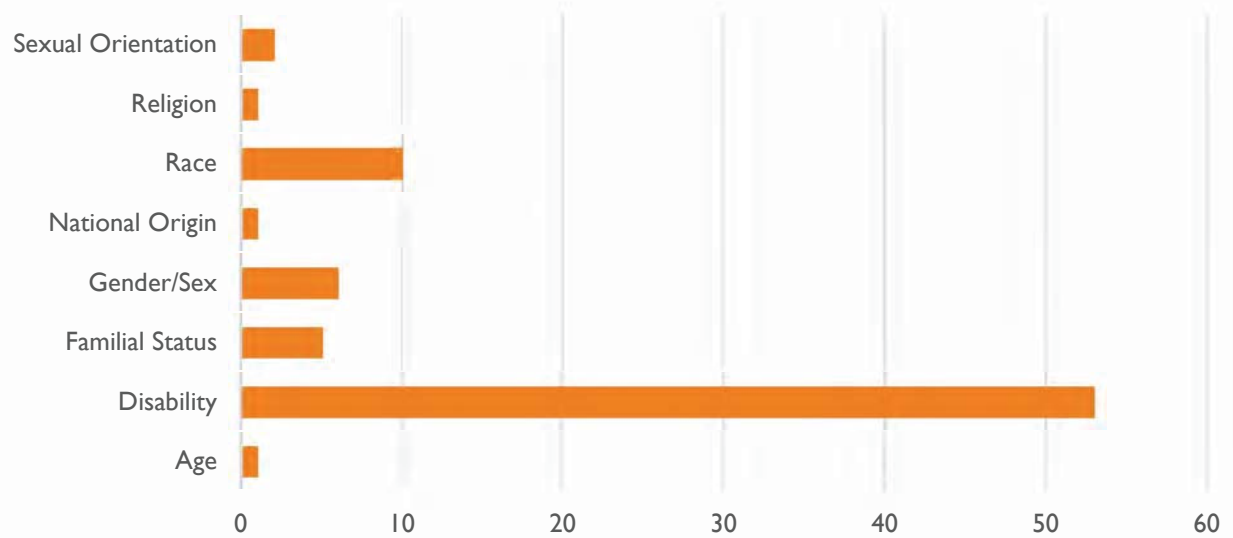
Chart 42 depicts the share of housing discrimination complaints by basis of the complaint. In California, disability was the most common basis for housing discrimination complaints to DFEH in 2018, accounting for 33 percent of all complaints. Race, age, and familial status were the next most frequent bases for housing discrimination complaints to DFEH. Retaliation, national origin, and sex/gender were also common. Complaints can be made on more than one basis.

Chart 42. Bases for Housing Complaints to DFEH 2018



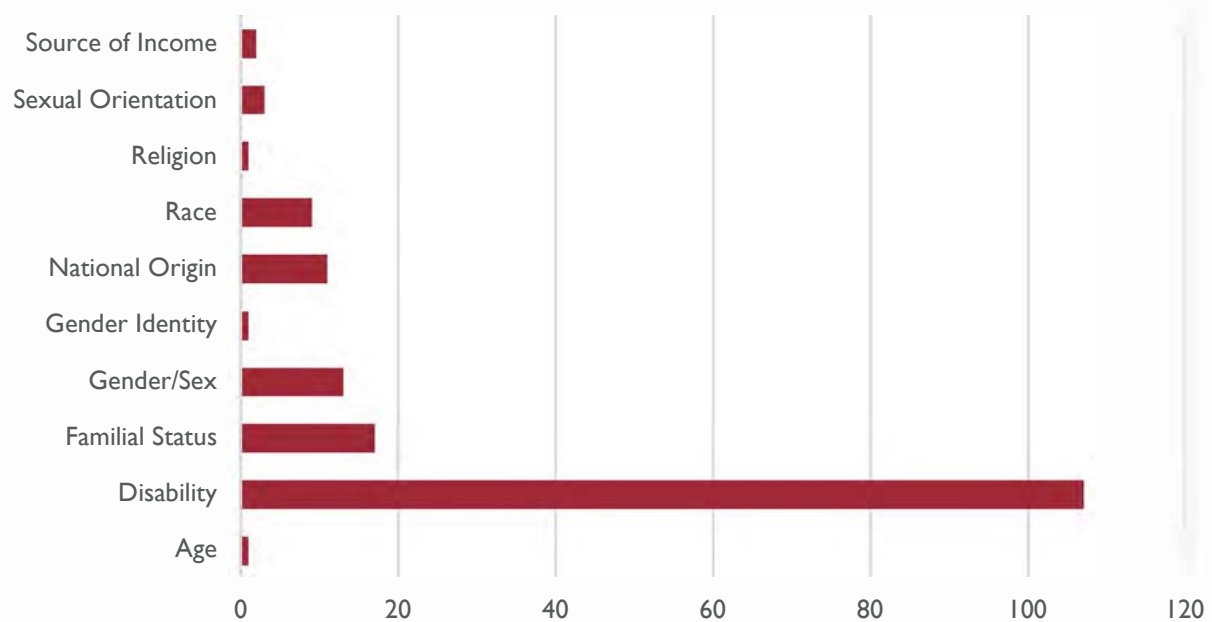
Source: 2018 Annual Report, California Department of Fair Employment and Housing

Chart 43. Stanislaus County Fair Housing Complaints, 2014-2019



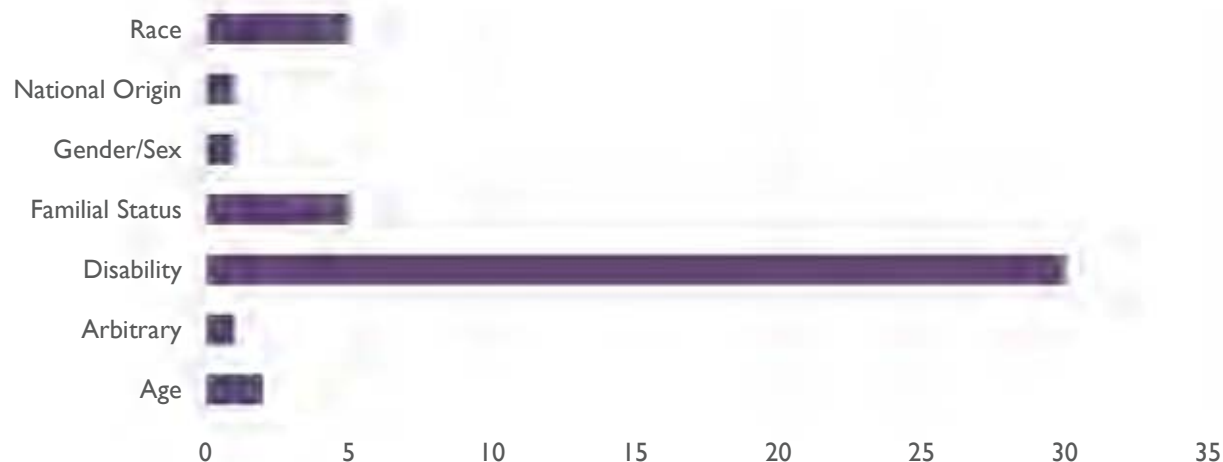
Source: 2019 Annual Report, California Department of Fair Employment and Housing

Chart 44. Modesto Fair Housing Complaints, 2014-2019



Source: 2019 Annual Report, California Department of Fair Employment and Housing

Chart 45. Turlock Fair Housing Complaints, 2014-2019



Source: 2019 Annual Report, California Department of Fair Employment and Housing

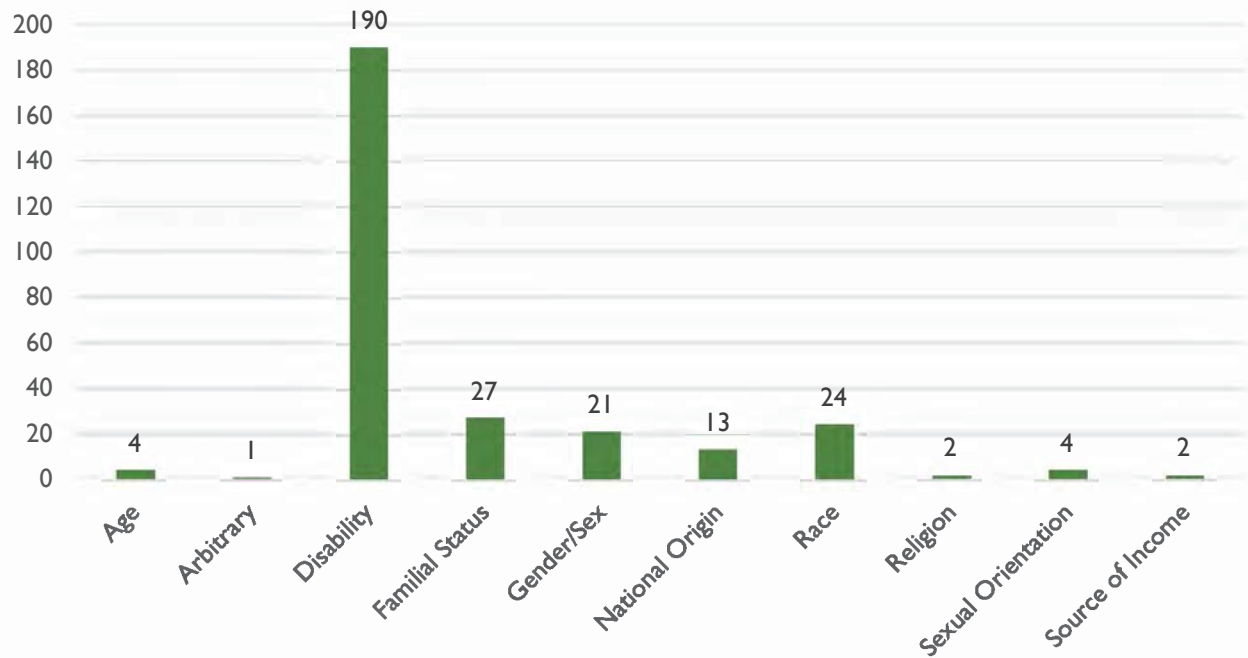
Charts 43, 44, and 45 present the count of housing discrimination complaints by basis in Stanislaus County, Modesto, and Turlock. These figures mirror statewide patterns with disability as the most cited basis for housing discrimination in complaints made between 2014 and 2019 for each jurisdiction. Familial status and gender status were the next most common at the County level and in Modesto while familial status and race were the next most common in Turlock. Table 17 indicates that Modesto had a significant number of complaints (165) compared to other jurisdictions in the County. This may be because Project Sentinel has a physical office in Modesto but could also be due to the amount of outreach or advertising to the public in Modesto, partnerships with other organizations, or the number of fair housing violations occurring. The larger number may therefore reflect successful community outreach as opposed to a greater prevalence of housing discrimination.

Table 17: Fair Housing Complaints by City/Community 2014-2019

Location	Complaints
Ceres	30
Empire	8
Hickman	1
Hughson	3
Modesto	165
Newman	7
Oakdale	21
Patterson	6
Riverbank	1
Waterford	6
Valley Home	1

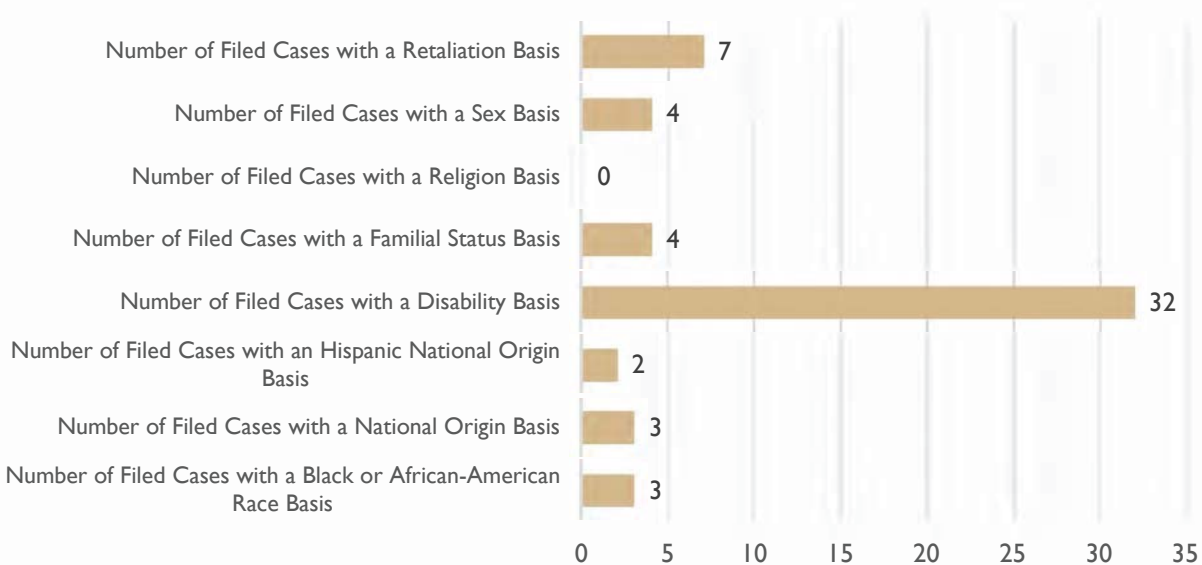
Source: Project Sentinel

Chart 46. All Stanislaus County Fair Housing Complaints, 2014-2019



Source: 2019 Annual Report, California Department of Fair Employment and Housing

Chart 47. HUD FHEO Filed Cases, 2014-2016



Source: HUD FHEO

PRIVATE SECTOR POLICY REVIEW

Mortgage Lending

This analysis primarily relies on lending data made publicly available through the Home Mortgage Disclosure Act (HMDA). The act requires that financial institutions, including banks, savings associations, credit unions, and other lenders, annually disclose mortgage data to the public. This data serves a variety of purposes including determining whether lenders are meeting community housing needs, supporting public officials in investments to encourage development, and identifying potential patterns of discriminatory lending.⁶ It is important to note that HMDA data by itself is insufficient to conclusively identify instances of discrimination in lending. Rather, analysis of HMDA data is useful for exploring discrepancies in lending outcomes and identifying areas of concern.

The most recent HMDA data available to the public is for 2018. Appendix X of this report includes detailed tables with data on the disposition of loan applications, types, and outcomes for Stanislaus County (all jurisdictions), Modesto, Turlock, and the Unincorporated County, which in 2018, included data for the following areas: Denair, Empire, Grayson, Hickman, Keyes, Knight Ferry, La Grange, Monterey Park, Riverdale Park, Salida, Valley Home, Vernalis, and Westley. Several tables compare data for these jurisdictions in 2018 to figures from 2008 and 2013 to analyze changes over time. Other tables explore differences in lending outcomes by applicant characteristics, including income level and race/ethnicity. Some tables are only applicable to Stanislaus County due to insufficient sample sizes for the other three jurisdictions.

General Overview

Data from 2018 indicates that about 16,000 loans originated in Stanislaus County, with 8,034 (50.2 percent) originating in 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, however, loan applications for individual jurisdictions have fluctuated over time. For example, in 2008, Stanislaus County had 26,824 originations and by 2013, this figure decreased to 24,588 applications. In comparison, in 2008, Modesto had 12,151 applications while Turlock had 2,162 and the Unincorporated County had 2,442. Five years later, these figures were 12,090 in Modesto, 3,984 in Turlock, and 2,893 in the Unincorporated County.

Regarding loan outcomes, 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. The remaining applications were either marked incomplete (3.9 percent), withdrawn by the applicant (12.3 percent), or marked as having another outcome (9.5 percent). Of the jurisdictions analyzed, loans originating in Turlock experienced the highest approval rate of 59.5 percent while applications in the Unincorporated County cumulatively witnessed the lowest approval rate of 54.4 percent. When it came to loan denial rates, loan applications in Modesto had the lowest rate at 16.9 percent while loans in the Unincorporated County had the highest rate at 20.0 percent. Notably, approval rates across Modesto, Turlock, Stanislaus County, and the Unincorporated County are slightly higher than the national approval rate of about 53.4 percent.

⁶ “Background and Purpose,” Home Mortgage Disclosure Act, FFIEC, accessed 11/19/2019, <https://www.ffiec.gov/hmda/history.htm>.

Characteristics of Loan Applicants.

Most individuals who initiated loan applications in Stanislaus County were White with 63.7 percent of applicants identifying as such in 2018. Hispanic individuals (of any race) comprised the second largest share that year, representing 26.8 percent of applicants. Black/ African American applicants made up 2.1 percent of applicants while Asian applicants comprised 5.6 percent. Over time, the demographic composition of loan applicants fluctuated little. In 2008, White applicants represented 68.2 percent of individuals applying for a loan while 26.9 percent of applicants were Hispanic, 1.6 percent were Black/ African American, and 4.5 percent were Asian. Five years later, these figures barely changed. More recently in 2018, the shares of White and Asian applicants have decreased slightly while the percentages of Black/ African American and Hispanic applicants have increased.

In comparison to the demographics of the total population for Stanislaus County, the data suggests that people of color are underrepresented among individuals applying for mortgage loans. Notably, Black/ African American applicants across all three years appear to be disproportionately less likely to apply for a loan relative to the number of Black/ African American individuals in the community. Unequal representation of applicants by race and ethnicity could suggest inequitable access to lending opportunities.

Loan Outcomes by Type and Purpose

HMDA data classifies loans by type and purpose. 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). Loan purposes include classifications such as home purchase, home improvement, and refinancing. It is important to note that following changes to data reporting requirements in 2018, HMDA data now reflects different classifications for loan purpose. Whereas in the past, financial institutions were required to report the purpose of a loan as either home purchase, home improvement, or refinancing, these are no longer the only options. For refinancing loans, lenders now must disaggregate this data as either home refinancing or cash-out refinancing. In addition, loan purpose data now captures loans that fall outside any of these classifications (i.e., loans that are neither for home improvement, home purchase, home refinancing, nor cash-out refinancing). This has implications for the comparison of 2018 data to that from prior years. Specifically, some loan purpose data which was previously captured is no longer reportable, while other data is now captured. It is important to keep this in mind when comparing older data to data released in 2018 and beyond.

In Stanislaus County, almost three-quarters of all loan applications were conventional purchase loans (72.6 percent) while the remaining (27.4 percent) were government-backed loans. The distribution of loan type is generally consistent across jurisdiction and the three years analyzed. When considering loan purpose, most loans in Stanislaus County were home purchase loans in 2018. A review of the distribution of loan purpose in 2008, 2013, and 2018 reveals that each jurisdiction witnessed significant decreases in the share of home purchase loans from 2008 to 2013 and then a rebound from 2013 to 2018. For instance, in 2008, 53.6 percent of loans in Stanislaus County were home purchase loans, 5.9 percent were for home improvement, and 40.6 percent were for refinancing. Five years later, the share of home purchase loans dropped to 32.4 percent, home improvement loans decreased to 2.5 percent, and refinancing loans jumped to 65.1 percent. By 2018, home purchase loans comprised 43.0 percent of loans in Stanislaus County, home improvement loans represented 7.8 percent, 14.7 percent were for home refinancing, and 27.1 percent for cash-out refinancing. This trend was apparent in Modesto, Turlock, the Unincorporated County, and Stanislaus County and most likely reflects conditions in the housing market following the financial crisis in 2008.

Loan Outcomes by Race and Ethnicity

Applicant Race and Ethnicity

One method to explore whether barriers to lending opportunities exist in a community is to analyze discrepancies in outcomes by an applicant's demographic characteristics. Disaggregating lending outcomes by applicant race and ethnicity is one way to search for such differences. Table 28 depicts lending outcomes by applicant race and ethnicity for Modesto, Turlock, Stanislaus County, and the Unincorporated County. The table indicates that although the overall approval rate in Stanislaus County in 2018 was 56.6 percent, this figure varied considerably based on an applicant's race or ethnicity. White applicants experienced the highest approval rate at 63.8 percent, whereas Asian applicants witnessed the lowest approval rate at 55.4 percent. Furthermore, Hispanic applicants had an approval rate of 59.7 percent and Black/ African American applicants had an approval rate of 57.1 percent. A similar pattern is apparent in Modesto, Turlock, and the Unincorporated County. For most years, approval rates for White applicants were the highest within each jurisdiction. There are a few exceptions, though. For example, in 2013, Asian applicants experienced the highest approval rate of 65.4 percent in Modesto while Hispanic applicants had the highest rate at 59.5 percent across the Unincorporated County.

When considering changes in approval rates over time, Table 28 suggests that County-level rates have increased. For instance, in 2008, Stanislaus County had an approval rate of 43.7 percent. Five years later, this figure was 56.4 percent, and by 2018, it was 56.6 percent. While Modesto and the Unincorporated County experienced peak approval rates in 2013, the differences between the rates for 2013 and 2018 are minimal at 0.4 and 0.5 percent, respectively.

It is also notable that approval rates for all groups have grown significantly since 2008. For example, from 2008 to 2018, Black/ African American applicants in Modesto witnessed a 24.9 percentage point increase in their approval rate. Similarly, Hispanic applicants in Turlock witnessed an increase in approval rates of 21.7 percentage points over the same period. Other large increases include a 23.8 percentage point increase for Black/ African American applicants in the Unincorporated County, however, the sample size of Black/ African American applicants was quite small at 27 in 2008 and 31 in 2018.

Table 28. Loan Outcomes by Applicant Race & Ethnicity

Jurisdiction	% of Total Applicants			% Approved			% Denied		
	2008	2013	2018	2008	2013	2018	2008	2013	2018
Modesto									
White	66.3%	66.4%	61.9%	50.6%	64.8%	64.3%	22.4%	13.8%	16.2%
Black	1.9%	1.8%	2.2%	33.5%	59.6%	58.4%	36.9%	17.4%	17.9%
Hispanic	22.9%	19.9%	25.8%	45.0%	60.3%	59.6%	28.4%	16.5%	20.9%
Asian	5.2%	6.8%	5.8%	49.2%	65.4%	56.8%	22.5%	15.3%	20.9%
Average				43.6%	57.1%	56.7%	22.0%	13.5%	16.9%
Turlock									
White	74.3%	68.5%	68.7%	48.8%	67.6%	65.5%	26.6%	13.7%	17.1%
Black	0.3%	0.6%	0.9%	42.9%	41.7%	55.0%	14.3%	33.3%	35.0%
Hispanic	22.8%	16.2%	21.1%	36.9%	64.9%	58.7%	37.7%	13.9%	22.4%
Asian	3.0%	5.8%	5.5%	37.5%	58.4%	53.1%	39.1%	19.5%	22.7%
Average				42.6%	59.1%	59.5%	25.7%	13.4%	17.2%
Unincorporated Areas									

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%	21.6%
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%
Jurisdiction	% Incomplete			% Other			% Withdrawn		
	2008	2013	2018	2008	2013	2018	2008	2013	2018
Modesto									
White	3.7%	3.4%	3.6%	13.4%	9.9%	2.8%	9.8%	8.1%	13.1%
Black	5.9%	3.8%	6.4%	13.1%	15.5%	2.3%	10.6%	3.8%	15.0%
Hispanic	5.0%	4.0%	3.6%	11.5%	9.9%	3.1%	10.0%	9.2%	12.9%
Asian	3.4%	3.9%	4.9%	13.3%	6.0%	1.9%	11.7%	9.4%	15.4%
Total	3.7%	3.8%	3.8%	20.9%	17.8%	9.7%	9.9%	7.9%	12.9%
Turlock									
White	3.2%	3.0%	3.5%	10.5%	7.7%	1.8%	11.0%	8.0%	12.1%
Black	0.0%	12.5%	5.0%	28.6%	4.2%	0.0%	14.3%	8.3%	5.0%
Hispanic	3.2%	4.6%	3.9%	10.1%	9.0%	1.8%	12.0%	7.6%	13.2%
Asian	4.7%	3.9%	5.5%	9.4%	4.8%	2.3%	9.4%	13.4%	16.4%
Total	3.5%	3.5%	3.5%	17.5%	16.1%	7.9%	10.6%	8.0%	11.9%
Unincorporated Areas									
White	4.1%	3.6%	3.9%	11.2%	16.5%	2.7%	10.8%	8.4%	13.0%
Black	3.7%	0.0%	0.0%	18.5%	0.0%	0.0%	11.1%	0.0%	9.7%
Hispanic	5.2%	3.4%	3.8%	9.9%	9.9%	2.5%	13.0%	9.7%	12.0%
Asian	3.9%	0.0%	6.7%	16.9%	0.0%	5.3%	7.8%	0.0%	9.3%
Total	4.0%	3.7%	4.0%	17.6%	16.4%	8.7%	10.0%	8.4%	12.8%
Stanislaus County									
White	3.5%	3.3%	3.7%	12.8%	9.5%	2.6%	10.0%	8.6%	12.6%
Black	5.7%	4.4%	6.2%	14.9%	14.4%	2.1%	10.6%	6.7%	14.8%
Hispanic	4.5%	4.2%	3.8%	11.5%	9.7%	2.5%	10.3%	9.4%	12.3%
Asian	4.0%	4.3%	5.5%	12.5%	5.5%	2.2%	10.9%	9.9%	13.2%
TOTAL	3.6%	3.8%	3.9%	20.1%	17.2%	9.5%	9.8%	8.4%	12.3%
Source: 2008, 2013, 2018 HMDA data									

Census Tract Minority Share

In addition to exploring lending outcomes by applicant race and ethnicity, this analysis considered how outcomes differed by the percentage of minority residents located in the same census tract. Due to historical patterns of discrimination such as redlining, an analysis that considers the influence of an area's demographic composition can see if such locational characteristics correlate with disparities in loan outcomes. One way to do this is to disaggregate the data by census tract minority share, or in other words, the percentage of minority residents in a census tract. For this analysis, "minority" refers to individuals who identify as Hispanic (of any race) or belonging to a race other than white. Table 19 presents loan outcomes for Stanislaus County by the proportion of minority residents in each tract. Since HMDA data for each application includes demographic and income data derived from the American Community Survey on a loan's corresponding census tract, the analysis used this data to classify each tract into a minority share bracket. Each of the five minority share brackets represents a range of 20 percentage points in order of increasing concentration.

Table 19. Outcomes by Census Tract Minority Share in Stanislaus County

Tract Minority Share	Total Applicants		Approved		Declined		Other	
	#	%	#	%	#	%	#	%
2008								
0-19% Minority	1,776	6.6%	815	45.9%	387	21.8%	574	32.3%
20-39% Minority	12,842	47.9%	5,772	44.9%	2,766	21.5%	4,304	33.5%
40-59% Minority	8,361	31.2%	3,613	43.2%	1,969	23.5%	2,779	33.2%
60-79% Minority	3,595	13.4%	1,420	39.5%	941	26.2%	1,234	34.3%
80-100% Minority	250	0.9%	101	40.4%	68	27.2%	81	32.4%
Total	26,824	100.0%	11,721	43.7%	6,131	22.9%	8,972	33.4%
2013								
0-19% Minority	0	0.0%	0	-	0	-	0	-
20-39% Minority	7,101	28.9%	4,109	57.9%	940	13.2%	2,052	28.9%
40-59% Minority	10,430	42.4%	5,992	57.4%	1,413	13.5%	3,025	29.0%
60-79% Minority	5,981	24.3%	3,221	53.9%	939	15.7%	1,821	30.4%
80-100% Minority	1,076	4.4%	552	51.3%	196	18.2%	328	30.5%
Total	24,588	100.0%	13,874	56.4%	3,488	14.2%	7,226	29.4%
2018								
0-19% Minority	16	0.1%	0	0.0%	10	62.5%	6	37.5%
20-39% Minority	3,691	23.1%	2,214	60.0%	579	15.7%	898	24.3%
40-59% Minority	6,278	39.2%	3,638	57.9%	1,054	16.8%	1,586	25.3%
60-79% Minority	4,798	30.0%	2,575	53.7%	945	19.7%	1,278	26.6%
80-100% Minority	1,217	7.6%	629	51.7%	251	20.6%	337	27.7%
Total	16,000	100.0%	9,056	56.6%	2,839	17.7%	4,105	25.7%
Source: 2008, 2013, 2018 HMDA data								

Notably, Table 19 indicates that the number of applications originating from census tracts in the lowest bracket, 0-19 percent, reached zero by 2013 and represented only 0.1 percent of total applications in 2018. There could be a few reasons for this. For one, individuals from tracts with low proportions of minority residents could have stopped applying for loans after 2008. Another possibility is that census tracts which were previously classified in the 0-19 percent minority share bracket have since diversified

and now fall within a different bracket. It is also possible that the large number of applications with redacted information (labeled as “NA” in the table) has distorted the distribution, creating the impression that virtually no applications originated in low minority share tracts after 2008. The explanation could even be a combination of all three possibilities. This uncertainty is important to keep in mind when analyzing the data.

When considering approval rates by minority share bracket, it appears that rates gradually decreased as the proportion of minority residents in a census tract increased. Table 19 indicates that tracts in the 60-79 percent and 80-100 percent minority share brackets witnessed lower approval rates than tracts with lower proportions of minority residents. The only exception is in 2018, where there were 16 applications from tracts classified in the lowest bracket and none were approved. Although inconclusive, this information suggests that the demographic composition of an application’s corresponding census tract could influence the likelihood of a loan being approved.

Loan Outcomes by Income Level

Applicant Income Level

Another method to search for discrepancies in lending outcomes is to explore differences by applicant income. This analysis assigned applicants in Stanislaus County to a corresponding income level relative to the county’s area median income (AMI) for family households.⁷ The parameters to define the lower and upper bounds for each level follow the same thresholds used in HMDA data. Table 20 presents the AMI for Stanislaus County for 2008, 2013, and 2018 and defines the following income levels:

Table 20. Area Median Income for Family Households in Stanislaus County

Area Median Income (in thousands)	2008		2013		2018	
	\$58		\$57		\$61	
	Lower	Upper	Lower	Upper	Lower	Upper
Low (0-49% AMI)	\$0	\$29	\$0	\$28	\$0	\$30
Moderate (50-79% AMI)	\$29	\$46	\$28	\$45	\$30	\$48
Middle (80-119% AMI)	\$47	\$69	\$45	\$67	\$49	\$72
Upper (>= 120% AMI)	\$70	∞	\$68	∞	\$73	∞

*Area median income for family households, rounded to the nearest thousandth.
Source: ACS 5-year estimates (2005-2009, 2009-2013, 2013-2017)*

Using these income levels, Table 21 presents the loan outcomes for applicants in Stanislaus County for 2008, 2013, and 2018. 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. 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. For instance, in 2018, upper income individuals had an approval rate of 64.7 percent whereas low income applicants had an approval rate of 38.8 percent. The only exception occurred in 2008, where moderate income

⁷ The area median income for family households is typically greater than area median income for all households in a jurisdiction. This analysis uses family household AMI to better reflect the earnings of prospective homeowners.

applicants, or individuals earning between 50-79 percent AMI, experienced the highest approval rate at 49.3 percent while upper income applicants had an approval rate of 48.3 percent.

In addition, Table 4 suggests that while overall approval rates increased over time, the gap between the highest and lowest income brackets lessened in 2013 and has since increased. For example, in 2008, the approval rate for low-income applicants was 37.0 percent. By 2013, this figure was 53.7 percent, and by 2018, it was 38.8 percent. Conversely, in 2008, 48.3 percent of loan applications for upper-income applicants were approved, while in 2013, this figure was 62.9 percent. By 2018, the approval rate for upper-income applicants was 64.7 percent. In other words, there was an 11.3 percentage point gap in approval rates between the highest and lowest income bracket applicants in 2008. In 2013, this gap represented 9.2 percentage points, and in 2018, it was 25.9 percentage points.

Table 21. 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	16,000	100.0%	9,056	56.6%	2,839	17.7%	4,105	25.7%
Source: 2008, 2013, 2018 HMDA data								

Census Tract Income Level

Similarly to exploring the influence of a community's demographic composition on loan outcomes, this analysis also considered the effect of census tract income. Using the same income brackets described in Table 20, this analysis ranked each applicant's corresponding census tract into an income bracket based on the tract's median income relative to area median income for Stanislaus County. Table 22 depicts lending outcomes for applicants based on the income level of their respective census tract.

Table 22 indicates that not only has the share of low-income census tracts been quite small for each of the three years analyzed, but it has been decreasing over time. This could signify that fewer applicants from low income tracts are applying for loans, fewer tracts are classified as low income, or a combination of both factors. Moreover, Table 22 indicates that approval rates tended to increase as income levels increased. For example, in 2008, loans from low income census tracts were approved 37.9 percent of the time while this figure was 40.5 percent for moderate income tracts, 43.5 percent for middle income tracts, and 45.9 percent for upper income tracts. This pattern repeated in 2013. In 2018, loan applicants from moderate income tracts had the lowest approval rate at 51.8 percent, followed by middle income tracts at 56.3 percent, low income tracts at 56.4 percent, and upper income tracts at 56.6 percent.

Table 22. Census Tract Income Level in Stanislaus County

Census Tract Income Level	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
2008								
Low (0-49% AMI)	512	1.9%	194	37.9%	139	27.1%	179	35.0%
Moderate (50-79% AMI)	4,997	18.6%	2,025	40.5%	1,271	25.4%	1,701	34.0%
Middle (80-119% AMI)	12,049	44.9%	5,246	43.5%	2,824	23.4%	3,979	33.0%
Upper (>= 120% AMI)	9,236	34.4%	4,239	45.9%	1,892	20.5%	3,105	33.6%
TOTAL	26,824	100.0%	11,721	43.7%	6,131	22.9%	8,972	33.4%
2013								
Low (0-49% AMI)	227	0.9%	112	49.3%	40	17.6%	75	33.0%
Moderate (50-79% AMI)	4,308	17.5%	2,336	54.2%	668	15.5%	1,304	30.3%
Middle (80-119% AMI)	10,814	44.0%	6,013	55.6%	1,577	14.6%	3,224	29.8%
Upper (>= 120% AMI)	9,239	37.6%	5,413	58.6%	1,203	13.0%	2,623	28.4%
TOTAL	24,588	100.0%	13,874	56.4%	3,488	14.2%	7,226	29.4%
2018								
Low (0-49% AMI)	101	0.6%	57	56.4%	21	20.8%	23	22.8%
Moderate (50-79% AMI)	2,891	18.1%	1,497	51.8%	570	19.7%	823	28.5%
Middle (80-119% AMI)	7,256	45.4%	4,084	56.3%	1,297	17.9%	1,873	25.8%
Upper (>= 120% AMI)	5,736	35.9%	3,418	59.6%	941	16.4%	1,376	24.0%
TOTAL	16,000	100.0%	9,056	56.6%	2,839	17.7%	4,105	25.7%
Source: 2008, 2013, 2018 HMDA data								

Loan Outcomes by Race/Ethnicity and Income Level

Tables 23 and 24 consider the combined effects of applicant race/ethnicity and income level. Table 23 depicts loan outcomes by applicant income level and race/ethnicity while Table 24 explores lending outcomes by applicant race/ethnicity and census tract income. Although disaggregating outcomes by tract minority share and median income would be a useful method to uncover discrepancies by locational characteristics, the HMDA data for Stanislaus County do not contain a sufficient sample of census tracts across each of the minority share brackets to allow for this type of analysis. Instead, Table 24 explores the intersection of applicant race and ethnicity by census tract income level. In addition, this analysis did not disaggregate lending outcomes by race/ethnicity and income level for each jurisdiction due to an insufficient sample size.

A comparison of Table 23 and 24 suggests that when considering the combined effects of race and income, there appears to be a clearer pattern based on applicant income as opposed to census tract income. For example, in Table 23, within each race or ethnicity, approval rates seem to increase as applicant income increases. In Table 24, however, the combined effects of applicant race/ethnicity and census tract income do not appear to produce any distinct patterns regarding approval rates. This could suggest that census tract income does not influence discrepancies in lending outcomes as much as other factors. It could also be explained by limitations in the data, which for some races and ethnicities, provided a small sample size. For instance, black applicants applying for loans in low-income census tracts had an approval rate of 100.0 percent in 2013 because there were two such applicants, both of whom had their loans approved. Although further information and analysis is required to determine the degree of correlation between race, ethnicity, and income on lending outcomes, Tables 23 and 24 indicate that discrepancies exist in Stanislaus County.

Table 23: Loan Outcomes by Applicant Income Level and Race/Ethnicity in Stanislaus County

Applicant Income by Race	Approved			Denied			Withdrawn/Other		
	2008	2013	2018	2008	2013	2018	2008	2013	2018
WHITE									
Low (0-49% AMI)	40.2%	59.6%	43.2%	36.8%	24.8%	32.4%	23.0%	15.6%	24.4%
Moderate (50-79% AMI)	52.5%	60.4%	57.1%	24.2%	16.2%	24.2%	23.3%	23.4%	18.8%
Middle (80-119% AMI)	51.4%	63.0%	65.3%	23.1%	13.8%	16.5%	25.5%	23.3%	18.3%
Upper (>= 120% AMI)	52.4%	67.0%	67.6%	24.1%	13.3%	14.2%	23.5%	19.7%	18.1%
BLACK									
Low (0-49% AMI)	23.8%	35.7%	52.4%	47.6%	50.0%	19.0%	28.6%	14.3%	28.6%
Moderate (50-79% AMI)	26.1%	52.1%	60.0%	37.0%	16.7%	25.7%	37.0%	31.3%	14.3%
Middle (80-119% AMI)	36.3%	57.6%	52.0%	29.8%	25.0%	19.4%	33.9%	17.4%	28.6%
Upper (>= 120% AMI)	42.2%	63.5%	67.6%	35.5%	16.7%	18.0%	22.3%	19.9%	20.3%
HISPANIC									
Low (0-49% AMI)	39.1%	56.1%	41.1%	36.3%	25.4%	36.8%	24.6%	18.6%	22.1%

Moderate (50-79% AMI)	49.3%	57.8%	56.1%	29.1%	17.4%	27.2%	21.6%	24.9%	16.8%
Middle (80-119% AMI)	46.9%	60.7%	61.9%	27.3%	15.5%	21.2%	25.9%	23.8%	16.8%
Upper (>= 120% AMI)	45.8%	63.0%	62.6%	30.9%	14.3%	17.4%	23.3%	22.7%	20.0%
ASIAN									
Low (0-49% AMI)	17.9%	53.8%	26.2%	57.1%	30.8%	50.0%	25.0%	15.4%	23.8%
Moderate (50-79% AMI)	51.8%	53.5%	39.8%	29.8%	18.9%	38.8%	18.5%	27.6%	21.4%
Middle (80-119% AMI)	54.3%	62.1%	62.4%	22.4%	18.0%	20.7%	23.3%	19.9%	16.9%
Upper (>= 120% AMI)	49.7%	66.3%	57.9%	25.6%	15.8%	19.8%	24.7%	17.8%	22.3%
Source: 2008, 2013, 2018 HMDA data									

Table 24. Loan Outcomes by Census Tract Income and Applicant Race/Ethnicity

Tract Income by Race	Approved			Denied			Withdrawn/Other		
	2008	2013	2018	2008	2013	2018	2008	2013	2018
WHITE									
Low (0-49% AMI)	45.7%	55.3%	69.7%	28.3%	19.5%	18.2%	26.0%	25.2%	12.1%
Moderate (50-79% AMI)	46.9%	62.6%	60.3%	26.7%	15.9%	20.2%	26.4%	21.5%	19.5%
Middle (80-119% AMI)	49.3%	63.1%	63.6%	24.5%	14.9%	17.3%	26.2%	22.0%	19.1%
Upper (>= 120% AMI)	52.8%	66.4%	65.9%	20.7%	13.3%	15.9%	26.5%	20.3%	18.2%
BLACK									
Low (0-49% AMI)	33.3%	100%	50.0%	26.7%	0.0%	50.0%	40.0%	0.0%	0.0%
Moderate (50-79% AMI)	21.3%	50.0%	56.1%	48.3%	27.1%	16.7%	30.3%	22.9%	27.3%
Middle (80-119% AMI)	35.0%	52.4%	58.9%	32.8%	19.9%	23.3%	32.1%	27.7%	17.8%
Upper (>= 120% AMI)	43.2%	57.9%	65.9%	26.8%	18.8%	17.1%	30.1%	23.3%	26.4%
HISPANIC									
Low (0-49% AMI)	46.6%	58.9%	69.8%	27.9%	15.9%	20.6%	25.5%	25.2%	9.5%
Moderate (50-79% AMI)	44.4%	60.2%	57.8%	29.7%	17.1%	24.7%	25.9%	22.7%	17.5%
Middle (80-119% AMI)	44.1%	58.8%	59.6%	29.5%	17.1%	21.2%	26.4%	24.2%	19.3%
Upper (>= 120% AMI)	47.3%	63.2%	61.5%	26.1%	14.3%	19.1%	26.6%	22.5%	19.3%
ASIAN									
Low (0-49% AMI)	41.2%	46.2%	66.7%	35.3%	38.5%	33.3%	23.5%	15.4%	0.0%

Moderate (50-79% AMI)	46.4%	58.1%	52.8%	26.5%	17.2%	21.6%	27.0%	24.6%	25.6%
Middle (80-119% AMI)	50.5%	62.9%	52.1%	24.1%	18.9%	26.1%	25.4%	18.2%	21.8%
Upper (>= 120% AMI)	46.3%	64.1%	59.4%	24.9%	16.2%	21.7%	28.8%	19.7%	18.9%
Source: 2008, 2013, 2018 HMDA data									

Loan Outcomes by Financial Institution

Lastly, this analysis considered how lending outcomes differed in Stanislaus County depending on which financial institution processed the loan application. Tables 25 and 26 present the top ten lenders for Stanislaus County in 2018 in order of market share. Table 26 indicates that Quicken Loans captured 15.0 percent of the market in 2018, followed by Bank of America at 11.8 percent, and JP Morgan Chase Bank at 11.5 percent. Table 25 distinguishes which of the county's top lenders were also among the top ten lenders for Modesto, Turlock, and the unincorporated areas. The table indicates that the most popular financial institutions at the county-level were also among the most popular in the other three jurisdictions.

Table 25. Top Ten Lenders in Stanislaus County by Jurisdiction

Top Lenders Stanislaus County	Modesto	Turlock	Unincorp. Areas	Stanislaus County
Quicken Loans, Inc.	X	X	X	X
Bank of America	X	X	X	X
JP Morgan Chase Bank	X	X	X	X
Stearns Lending, LLC.	X	X	X	X
Scenic Oaks Funding, Inc.	X	X	X	X
American Pacific Mortgage Corporation	X	X	X	X
Loandepot.com, LLC.	X	X	X	X
U.S. Bank	X	X	X	X
Flagstar Bank	X	X	X	X
United Shore Financial Services, LLC.	X		X	X
An "X" indicates that the lender is one of the top ten lenders for the jurisdiction				
Source: 2018 HMDA data				

Table 26. Lending Outcomes of Stanislaus County's Top Ten Lenders

Top Lenders Stanislaus County (2018)	Overall County Market Share			Approved		
	2008	2013	2018	2008	2013	2018
Quicken Loans, Inc.	2.2%	14.4%	15.0%	50.0%	85.1%	71.4%
Bank of America	28.1%	23.2%	11.8%	62.3%	65.9%	42.3%
JP Morgan Chase Bank	43.6%	19.5%	11.5%	15.9%	52.8%	44.6%
Stearns Lending, LLC.	11.5%	8.4%	10.5%	80.0%	78.3%	74.9%
Scenic Oaks Funding, Inc.	0.0%	8.5%	10.4%	-	76.6%	80.0%
American Pacific Mortgage Corporation	0.3%	4.7%	10.3%	0.0%	88.1%	85.4%

Loandepot.com, LLC.	0.0%	6.1%	8.5%	-	35.0%	61.2%
U.S. Bank	5.3%	6.4%	8.5%	35.5%	45.9%	33.1%
Flagstar Bank	9.0%	7.3%	7.0%	71.8%	48.3%	54.3%
United Shore Financial Services, LLC.	0.0%	1.4%	6.4%	-	60.6%	78.6%
Top Lender Total	18.3%	28.5%	46.7%	18.0%	32.6%	51.8%
Top Lenders Stanislaus County (2018)	Denied			Withdrawn/Closed		
	2008	2013	2018	2008	2013	2018
Quicken Loans, Inc.	50.0%	14.9%	20.8%	0.0%	0.0%	7.7%
Bank of America	27.8%	13.4%	42.8%	9.9%	20.7%	14.9%
JP Morgan Chase Bank	13.8%	16.2%	28.3%	70.3%	30.9%	27.1%
Stearns Lending, LLC.	14.3%	5.8%	15.6%	5.7%	16.0%	9.5%
Scenic Oaks Funding, Inc.	-	5.4%	2.0%	-	18.1%	17.9%
American Pacific Mortgage Corporation	38.5%	5.2%	5.4%	61.5%	6.7%	9.2%
Loandepot.com, LLC.	-	40.8%	17.4%	-	24.2%	21.4%
U.S. Bank	9.5%	26.8%	35.2%	55.0%	27.3%	31.7%
Flagstar Bank	21.4%	7.2%	9.1%	6.8%	44.4%	36.6%
United Shore Financial Services, LLC.	-	21.2%	7.9%	-	18.2%	13.5%
Top Lender Total	15.3%	29.4%	51.3%	20.7%	20.1%	32.4%
<i>Source: 2008, 2013, 2018 HMDA data</i>						

Table 26 presents the loan outcomes for Stanislaus County applicants in 2008, 2013, and 2018. Firstly, it is interesting to note the change over time for each institution's market share in the county. For example, in 2008, Quicken Loans had a small presence in Stanislaus County with a market share of 2.2 percent whereas Bank of America captured 28.1 percent of the market. Ten years later, Quicken Loans had the largest market share of any financial institution in the county at 15.0 percent while Bank of America's share had fallen by over sixteen percentage points. These shifts most likely reflect the significant changes in the mortgage industry following the 2008 financial crisis.

When considering differences in approval rates by institution, there is clearly a wide gap between the lowest and highest rates. Specifically, U.S. Bank had the lowest approval rate in 2018 at 33.1 percent whereas American Pacific Mortgage Corporation had the highest at 85.4 percent. Combined, the county's top ten lenders represented 51.8 percent of all approved loans and 51.3 percent of all denied loans across Stanislaus County in 2018. Table 9 also indicates that approval rates fluctuated within the same institution over time. For instance, in 2008, Flagstar had an approval rate of 71.8 percent in Stanislaus County, yet five years later this figure was 48.3 percent, and by 2018 it was 54.3 percent. It is unclear why these rates changed so dramatically within individual institutions.

An analysis of the rates for withdrawn and closed applications for the county's top 10 lenders shows great variation by financial institution and year. In mortgage lending, fallout refers to a loan application that is withdrawn by the borrower before the loan is finalized. Typically, for-profit lenders should have little fallout, and none that varies by race or ethnicity. A significant disparity in fallout could suggest screening, differential processing, HMDA action misclassification, and/or the potential of discouragement of minority applications. Closed applications refer to applications that are closed by the lender due to incompleteness. A high rate of incomplete loans can indicate a lack of financial literacy on the part of the borrower. Insufficient lender assistance during the application process can also lead to high levels of incomplete

applications. The lack of lender assistance may be discriminatory in motive or outcome; however, HMDA data cannot be used to prove motive.

In Stanislaus County, there was a wide range for rates of withdrawn and closed applications. For example, in 2018, rates ranged from a low of 9.2 percent at American Pacific Mortgage Corporation to a high of 36.6 percent for Flagstar. Some individual institutions also experienced considerable fluctuation in their rates for withdrawn and closed applications. Bank of America, for instance, reported 9.9 percent of loan applications as withdrawn or closed in 2008. In 2013, this figure was 20.7 percent, and in 2018 it was 14.9 percent.

REAL ESTATE ASSOCIATION POLICIES

There are two predominant real estate groups active in Stanislaus County. The first group is associated with the National Association of Realtors (NAR) and includes a state and local chapter. The second group is associated with the National Association of Real Estate Brokers (NAREB) and also includes a state and local chapter. The term “realtor” is a registered collective membership mark of the NAR with its use signifying an individual’s affiliation with the organization.⁸ As such, the NAREB uses the term “realist” to distinguish its affiliates from the NAR.

Both organizations outline specific professional standards and codes of ethics for their members to follow. The following section provides a broad overview of each organization’s standards as they apply to fair housing.

National Association of Realtors

As one of nation’s predominant trade association for real estate professionals, the NAR aims to shape policies impacting the industry. On its website, the organization includes a statement on its commitment to diversity and inclusion which reads:

NAR fully embraces perspectives from all walks of life—regardless of race, ethnicity, gender, religion, age, sexual orientation, gender identity, disability, national origin, socioeconomic status, political affiliation or any other qualities by which we may define ourselves.⁹

Furthermore, the NAR publishes a code of ethics for members which details standards for real estate professionals. As with the organization’s diversity and inclusion statement, in some cases the code surpasses requirements outlined by federal law. For example, Article 10 of the code states that realtors shall not deny equal services on the basis of sexual orientation and gender identity in addition to other groups protected by federal law. Each year, NAR publishes its Professionalism in Real Estate Practice handbook, which provides guidance for professionals in applying the Code of Ethics.

State and Local Branches of NAR

The NAR has state and local branches across the country, and in California, these include the California Association of Realtors (CAR) and the Central Valley Association of Realtors (CVAR). In addition to adopting the ethics standards set by the NAR, the state branch promotes its own diversity and inclusion programs, such as the Latino Initiative Voices in Action program, which provides educational materials for members on homeownership opportunities and fraud prevention.

⁸ National Association of Realtors, “About NAR,” accessed 2/25/2020, <https://www.nar.realtor/about-nar>.

⁹ Ibid.

National Association of Real Estate Brokers

The National Association of Real Estate Brokers (NAREB) was established in 1947 as national trade association for African American real estate professionals with the goal of promoting economic improvement, equal opportunity, and civil rights for minority communities. Although historically the NAREB was founded by and for African American real estate professionals, today the organization promotes “democracy in housing,” or fair housing opportunities for all; however, the organization continues to advocate predominantly for African American homeownership.¹⁰

Similar to the NAR, the NAREB follows a strict code of ethics stating that “any Realtist shall not discriminate against any person because of race, color, religion, sex, national origin, disability, familial status, or sexual orientation in the sale or rental of real property, in advertising the sale or rental of real property, in the financing of real property, or in the provision of professional services.”¹¹ The NAREB Code of Ethics furthermore states that “a Realtist shall not be instrumental in establishing, reinforcing, or extending any agreement or provision that restricts or limits the use or occupancy of real property to any person or group of persons on the basis of race, color, religion, sex, national origin, disability, familial status, or sexual orientation.”¹²

State and Local Branches of NAREB

As with the NAR, NAREB has state and local affiliates across the country including the California Association of Real Estate Brokers (CAREB) and the Central Valley Realists Association. Both branches uphold the national organization’s code of ethics.

IMPEDIMENTS TO FAIR HOUSING CHOICE

Communities identify specific barriers (“impediments”) to fair housing choice and create action steps to remove or reduce these barriers.

Modesto

The *City of Modesto Analysis of Impediments to Fair Housing Choice for Fiscal Years 2015-2020* did not directly identify any fair housing impediments for the City of Modesto. The 2018-2019 CAPER for Modesto identifies the following fair housing concerns:

1. Access to information about housing availability and choices among recent immigrants who are disproportionately lower income.
2. Lack of access to adequate housing due to poor credit history, insufficient funds for moving expenses, and other factors among financially vulnerable groups, such as female-headed households with children and the homeless.
3. Barriers faced by large, low-income and moderate-income families due to occupancy restrictions imposed by rental property owners.
4. The need to assist homeowners who have experienced foreclosure, who are disproportionately minority households, to find alternative living arrangements.

¹⁰ National Association of Real Estate Brokers, “NAREB History,” accessed 2/25/2020, <http://www.nareb.com/our-history/>.

¹¹ California Department of Real Estate, “3. Trade and Professional Organizations,” in *A Real Estate Guide*, accessed 2/25/2020, pages 39-40, <https://dre.ca.gov/files/pdf/refbook/ref03.pdf>.

¹² Ibid, 40.

Within the last Analysis of Impediments document, the City listed following goals to improve housing access:

- *Supporting organizations that provide fair housing education, homebuyer education, and landlord tenant mediation;*
- *Offering housing rehabilitation and homebuyer assistance;*
- *Working with nonprofit organizations to reduce barriers to housing and to increase the supply of affordable housing;*
- *Promoting economic development to increase job opportunities; and*
- *Participating in partnerships with public and private organizations to improve job skills among Modesto's lower-income households.*

Stanislaus Urban County and Turlock

Stanislaus Urban County and City of Turlock Regional Analysis of Impediments to Fair Housing Choice Fiscal Years 2015–2020 identified the following impediments and corresponding actions:

Affordable Housing

1. Impediment: Insufficient supply of affordable housing.

1.1 Action: Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.

1.2 Action: Continue to offer regulatory relief and incentives for the development of affordable housing.

1.3 Action: Continue to ensure the availability of adequate sites for the development of affordable housing.

2. Impediment: Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.

2.1. Action: Continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of lower-income households.

2.2. Action: Continue to support the Stanislaus Housing Authority Section 8 Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at the public counters for the Stanislaus County Department of Planning and Community Development, City of Turlock Housing Services, and all Stanislaus Urban County member jurisdictions. Stanislaus County and the City of Turlock will hold periodic meetings with representatives of the Housing Authority of the County of Stanislaus to discuss actions Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions can take to coordinate housing program implementation.

2.3 Action: Follow through on the Housing Element policies and programs.

Private Practices and Mortgage Lending

3. Impediment: Differential origination rates based on race, ethnicity, and location.

3.1. Action: When selecting lending institutions for contracts and participation in local programs, Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of "Outstanding" and may exclude those with a rating of "Needs to Improve" or "Substantial Noncompliance" according to the most recent examination

period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, the Stanislaus Urban County and the City of Turlock may review an individual institution's most recent HMDA reporting as most recently published by the FFIEC.

- 3.2 Action: Strengthen partnerships with lenders to discuss lenders' community reinvestment goals, including home mortgages, home improvement loans, and community development investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.

4. Impediment: Limited coordination with real estate industry.

- 4.1 Action: Work cooperatively with the real estate industry to develop ways for local agents to become more familiar with Stanislaus Urban County and City of Turlock housing and rental assistance programs.
- 4.2 Action: Encourage Realtors to seek fair housing training.

Fair Housing Education and Enforcement

5. Impediment: Limited knowledge of fair housing rights.

- 5.1 Action: Conduct more outreach to educate tenants, and owners and agents of rental properties, regarding their fair housing rights and responsibilities.
- 5.2 Action: Provide educational literature in English, Spanish, and other appropriate languages

6. Impediment: Discrimination in rental housing.

- 6.1 Action: Support efforts to enforce fair housing rights and provide redress to persons who have been discriminated against.
- 6.2 Action: Support efforts to increase the awareness of discrimination against all Federal and State protected classes.

Government Barriers

7. Impediment: Local development standards and their implementation, e.g., zoning, building, or design standards, may constrain development of housing opportunities for minority and low-income households.

- 7.1 Action: Review zoning and related regulations to determine the degree of adequate opportunity in the community for affordable housing to exist and to develop new affordable housing options.

8. Impediment: Inadequate access to employment opportunities, transportation, and public and social services, and infrastructure to support increased housing opportunities for lower-income households.

- 8.1 Action: Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans.

Impediment Actions Taken 2015-2019

Over the past five years, Modesto and Stanislaus Urban County & Turlock have taken actions towards removing or reducing impediments to fair housing choice identified in the 2015-2019 AI documents and as best practices to Affirmatively Further Fair Housing.

Affordable Housing Actions

Modesto established its Relocation Assistance Program in June 2009 to reimburse tenants for relocation expenses when forced to move from a property found to have severe code violations threatening the life, health, and safety of residents.

Stanislaus County continues to send out an annual Notice of Funding Availability (NOFA) to inform nonprofits of CDBG and ESG funding resources. The County also provides Grant Technical Workshops to explain grant requirements and provide educational materials to organizations.

The County continues to operate its Focus on Prevention Initiative to encourage new partnerships between private and nonprofit organizations for affordable housing development and homelessness services.

The Housing Authority of the County of Stanislaus (HACS) operates seasonal migrant housing units and continues to work with local government agencies and family resource centers to promote migrant housing opportunities. Staff meet with migrant service providers to educate staff about affordable housing resources.

In 2018, Stanislaus County and the Cities of Modesto, Turlock, Oakdale, Newman and Patterson declared a shelter crisis allowing the governments to adopt local procedures for the development of homeless shelters. During this period, ordinary zoning provisions for homeless facilities are suspended. Modesto has used the declaration to help the local Salvation Army shelter add an additional 182 beds.

In 2016, the County Community Development staff met with organizations such as World Relief Modesto to determine whether local affordable housing alignment efforts could be considered a part of the Focus on Prevention effort to help address the influx of refugees into Stanislaus County from countries such as Syria.

Modesto partnered with local affordable housing providers to increase the supply of affordable housing units by adding 157 affordable housing units and rehabilitating 155 rental housing units. Modesto also provided owner-occupied housing rehabilitation assistance to 73 households and first-time homebuyer assistance to three low/moderate income households.

In 2019, the City of Modesto approved a Rental Housing Safety Inspection program. The program is intended to maintain the supply of safe, decent, and sound affordable housing through the conservation and rehabilitation of the City's existing housing stock. Up to ten percent of all rental units in the Self-Certification program shall be selected (based on statistical information) for inspections. This program has been approved but awaiting implementation.

Stanislaus County extended sewer services to the Parklawn and Airport Neighborhoods allowing for expanded infill development housing opportunities and is underway with the planning for sewer extension in the West Modesto area.

In partnership with the City of Oakdale, Stanislaus County has partnered with the Housing Authority on the development of a 56-unit affordable housing development in the City of Oakdale on property acquired by the Stanislaus Urban County utilizing Neighborhood Stabilization Program funding and has contributed approximately \$3 Million to construction of the development.

In partnership with the Housing Authority, Stanislaus County has partners to develop six affordable housing units on NSP acquired properties, utilizing both NSP funding and funding from the Successor Housing Agency to the former Stanislaus County Redevelopment Agency.

Stanislaus County has hosted convenings of both for profit and non-profit housing developers to identify opportunities and constraints in the development of affordable housing throughout the community.

Stanislaus County has waived and deferred its Public Facilities Fees to aid in the development of numerous affordable housing development projects within the incorporated areas.

Stanislaus County has partnered with the Housing Authority to utilize the Empire Migrant Housing for a cold-weather family shelter.

Private Practices and Mortgage Lending Actions Taken 2015-2020

Stanislaus Urban County previously identified the need to support homeowners who had experienced foreclosure with finding alternative living arrangements. Though the mortgage crisis has subsided, staff continue to monitor local foreclosure rates for developments in foreclosure trends that could have a harmful effect on the community.

In 2016, the City of Modesto partnered with affordable housing programs to assist first time buyers purchase a home and provides referrals for alternative living arrangements for homeowners who experienced a foreclosure.

Fair Housing Education and Enforcement Actions

The County and Turlock continue to partner with Project Sentinel to provide fair housing services and conduct fair housing testing. In program year 2015-2016, the organization conducted four fair housing tests in Newman, Ceres, Oakdale, and Valley Home in response to allegations or claims of practices that may have violated fair housing law. In Newman, the fair housing test found partial compliance with the law regarding reasonable accommodation for service/assistance animals for an individual with a disability. In Ceres, the fair housing test did not find evidence of discrimination regarding familial status. In Oakdale, the fair housing test found evidence of a violation of fair housing law regarding reasonable accommodation for service/assistance animals for an individual with a disability. In Valley Home, the fair housing test did not find evidence of discrimination on the basis of national origin. When applicable, Project Sentinel sent property owners educational letters to elaborate on applicable sections of fair housing law. The organization also continues to monitor and follow up with properties that were required to take corrective action.

Modesto continues to work with Project Sentinel to provide fair housing services. During the past five years, Project Sentinel opened a total of 122 fair housing discrimination cases for investigation and provided fair housing education and tenant/landlord mediation to over 5,500 individuals.

Other Actions

Over the last five years, Modesto has provided economic development assistance to two microenterprise businesses in Modesto.

Modesto promoted economic development by financially supporting Opportunity Stanislaus to provide job training opportunities to low- and moderate-income persons in the industrial maintenance mechanics field via the VOLT Institute.

Stanislaus County has approved Crows Landing Industrial Business Park, a 1,528 acre site that will bring jobs to the County, development opportunities, and preserve agricultural land by reusing the former Crows Landing airfield. The development has the potential to provide for approximately 15,000 new locally based jobs for an existing workforce that currently commutes outside of the County to obtain jobs with sustainable wages.

Impediments to Fair Housing Choice 2020-2025

Summary of impediments and corresponding action items

1. Turlock's zoning definitions do not match as there is an age discrepancy (between 55-60) in the definition of "senior housing" and difference in the allowable household relationships of senior housing residents with a non-spouse domestic partner, primary physical/economic support person, and/or disabled child, grandchild, or partner under the age of 60.

Action: Consider revision of zoning ordinance definition of "senior housing" in Turlock to align with Section 43-53.7 of the Civil Code of the State of California.

2. In Stanislaus County, 44 percent of households earning \$20,000 or less annually do not have Internet access, while only 6 percent of households making at least \$75,000 do not have access. In the state, about half of households without Internet access cite the cost of broadband service or a computer/device for their lack of access. A statewide survey indicates three in four of these households do not know they may qualify for discounted, income-based Internet service in California.

Action: Pursue conducting, funding, and/or facilitating Internet service financial assistance education and outreach activities that target low-income residents of Stanislaus County.

3. There is a limited knowledge of fair housing rights among the general population.

Action: Support outreach activities that educate tenants, the owners and agents of rental properties, and all others who interact with housing transactions regarding their fair housing rights and responsibilities.

Action: Provide educational literature in English, Spanish, and other appropriate languages.

Action: Provide education and fair housing referral information to organizations who interact with and serve low-income or protected class populations in order to identify potential fair housing violations.

4. Discrimination in rental housing often occurs without legal complaint and opportunity for redress/ resolution to fair housing violations.

Action: Support enforcement of fair housing rights through advocacy and legal support for those persons who allege incidents of fair housing discrimination.

5. There is support and assistance need for homeowners who have experienced foreclosure, homeowners and renters who are members of a protected class, and others who must find affordable living arrangements.

Action: Finance, facilitate, and otherwise support affordable housing programs within all Stanislaus County jurisdictions, including those that support the creation or preservation of affordable housing, rehabilitation of substandard housing, and/or assistance to homeowners and renters in need of disability modifications.

Action: Continue to support the Stanislaus Housing Authority Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at government buildings.

Action: Promote economic development and job training activities to increase job opportunities and wages of low-income residents in order to increase overall household income and reduce housing cost burden.

ATTACHMENT 2

Stanislaus Urban County & City of Turlock Consortium Consolidated Plan Fiscal Year 2020-2025



May 12, 2020

This is the final draft version of the “Stanislaus Urban County & City of Turlock Consolidated Plan Fiscal Year 2020-2025”. New wording is indicated in bold font and deleted wording is reflected in strikethrough font.*

**Note: Bold and strikethrough text was not used for administrative cleanup.*

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Executive Summary

ES-05 Executive Summary

Introduction

Each year the United States Department of Housing and Urban Development (HUD) provides funding for housing and community development programs to the Stanislaus Urban County and the City of Turlock, specifically Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) grant. In order to receive these funds, the City of Turlock and the Stanislaus Urban County must complete a report every five years called a Consolidated Plan. The Consolidated Plan covers a total of five (5) program years; 2020 to 2024.

It is important to understand that during the development of this Consolidated Plan, the County, all Urban County Cities, and the City of Turlock were put in a position to react to the unique Coronavirus, COVID-19 outbreak. The outbreak of COVID-19 dramatically shifted economic conditions of jurisdictions throughout the Country. All data reflected in this report does not take into account the economic realities that COVID-19 impacted on the communities throughout the County. The Urban County, and the City of Turlock will receive federal funding to address COVID-19, and those funding allocations and strategies will likely be outlined in an amendment to this Consolidated Plan and/or Action Plan.

Throughout this document the following geographic terms will be used:

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

The purpose of the Consolidated Plan is to identify housing and community development needs, priorities, goals, and strategies and to allocate how the County’s’ and City of Turlock’s HUD funds will be utilized over the period of the Consolidated Plan.

The Consolidated Plan includes the Annual Action Plan (AAP), which is the one-year plan that the Stanislaus Urban County and the City of Turlock prepare pursuant to the goals outlined in the Consolidated Plan. These AAPs detail the projects and activities that the Stanislaus Urban County and City of Turlock will undertake to address the housing and community development needs and local objectives using CDBG, ESG, and HOME funds received during Fiscal Year 2020.

Summary of the Objectives and Outcomes Identified in the Plan Needs Assessment Overview

The Stanislaus Urban County and City of Turlock have identified six goals to address housing and community development needs during the span of the 2020-2024 Consolidated Plan:

1. Increase and improve supply of affordable housing
2. Work to end and prevent homelessness
3. Improve infrastructure and public facilities
4. Provide public services
5. Community emergency responses
6. Administration

During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$2,300,000 annually in CDBG funding, for a five-year total of \$11,500,000. During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$200,000 annually in Emergency Solutions Grant (ESG) funding, for a five-year total of \$1,000,000.

During the five-year Con Plan period, the City of Turlock expects to receive \$650,00 annually in CDBG funding, for a five-year total of \$3,250,000. The HOME Consortium anticipates approximately \$1,350,000 in annual HOME funds, for a five-year total of \$6,750,000 over the five-year Con Plan period.

CDBG funds are used by the Stanislaus Urban County and City of Turlock for public services, public facilities and improvements, housing activities, and planning and administrative costs.

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

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

Evaluation of Past Performance

Stanislaus Urban County

The priorities identified in the Con Plan are public infrastructure, economic development, affordable housing and public services. In many neighborhoods and communities of the planning area, public infrastructure is minimal or non-existent, causing this to be a high priority need. Infrastructure such as sewer, water, curb, gutter, sidewalk, and storm drainage are typical development standards in newer neighborhoods but are non-existent in older neighborhoods. The cities of Ceres, Hughson, Newman, Oakdale, Patterson, Waterford, as well as Stanislaus County utilized CDBG funds for infrastructure improvement related projects. The City of Riverbank will also be part of the Urban County moving forward. As a result of these improvements, residents of the surrounding project areas enjoy an improved quality of life.

Through the CDBG Public Services Program, the Stanislaus Urban County sets aside approximately 10% of its annual CDBG allocation for programs that provide services to low to moderate-income households (families or individuals). In Fiscal Year 2018-2019, a total of 12 public service programs were awarded \$239,053 to carry-out a number of needed services that benefit the homeless populations. Approximately 2,115 individuals received a form of service through the funded agencies. Funded services ranged from meals and shelter for low-income households to emergency food assistance programs. The services provided through the funded programs positively impact the lives of the households served.

The Focus on Prevention Initiative is a strategy for community transformation in four areas critical to the quality of life in Stanislaus County (homelessness, strengthening families, youth early intervention, and reducing recidivism). The goal of the Focus on Prevention Initiative is to bring all sectors of the community together to provide an opportunity for cross-sector development of community-wide prevention strategies. The Initiative reinforced the collaboration efforts and commitment between the local CoC and the community to work towards resolving homelessness. A Coordinated Entry System (CES) in conjunction with the existing Homeless Management Information System (HMIS) system was designed in Fiscal Year 2017-2018, began planning a phased implementation in Fiscal Year 2018-2019, and continued further development to begin implementation in Fiscal Year 2019-2020. Stanislaus County, through collaboration with stakeholders, worked on updating CES policies and procedures. The Stanislaus Urban County is working with the CoC and other entitlement jurisdictions to oversee and monitor for federal compliance the CES system. Throughout Fiscal Year 2019-2020, the Stanislaus Urban County and the local CoC worked together on strengthening efforts to address and collaborate on homeless issues.

City of Turlock

Consistent with the priorities outlined in the Consolidated Plan, during the 2018-2019 fiscal year, the City and the Consortium undertook the following activities that addressed the housing needs:

The City and Consortium continued to administer a First Time Home Buyers (FTHB) Program for low-income, first-time homebuyers which provides low interest loans to qualified clients to purchase a home. The City of Turlock utilized various resources including the HOME Program, CDBG, and CalHome to fund

the program and assisted four homebuyers. The following Consortium members assisted homebuyers during the last Consolidated Plan period with down payment assistance or first-time homebuyer loan programs:

- Stanislaus County – One
- Ceres - Five
- Oakdale – One

The City continued offering a Housing Rehabilitation Program, for the repair of homes within the City and assists income eligible clients including the elderly, handicapped and other special needs, improving housing conditions. The program provided one forgivable loan and one deferred loan with the rehabilitation of two single family units which were initiated in fiscal year 2018-2019 and should be completed in fiscal year 2019-2020. Temporary relocation funding was not needed or provided to these two clients. Two projects that were initiated in fiscal year 2017-2018 were completed in fiscal year 2018-2019. Forgivable Loans are often used in concert with the rehabilitation loans that are provided for rehabilitation work to remedy code violations and accessibility items for seniors, disabled and income eligible families. The Forgivable Loan amount cannot exceed \$15,000. Families are only eligible to receive the Forgivable Loan funding on a one-time basis, even if the maximum limit was not received. Forgivable Loan funding can be combined with other rehabilitation program funding and forgiven over a five-year period as long as all the terms of the loan are met.

Acquisitions of multi-family units for rehabilitation and sale to eligible non-profit agencies: The City acquired rental projects which consists of multi-family units. The rehabilitation will be completed in the next fiscal year.

Acquisitions of single-family units for rehabilitation and sale to eligible non-profit agencies or First Time Home Buyers.

Public Service Grants including fair housing: The City provides funding annually to non-profit agencies to provide eligible public service activities including fair housing services

Summary of Citizen Participation Process and Consultation Process

The community outreach process included a County-wide survey, two stakeholder meetings, community meetings, and agency phone and email consultations on the Con Plan. Draft documents were made available to the public via Turlock's City website and the County's website as well as emailed directly to City staff of urban County cities.

Summary of Public Comments

The outreach effort for the Con Plan, AAP and the AI reached a wide number of agencies and individuals throughout the County and Turlock. Overall, some general themes emerged throughout the process which helped guide the development of the Con Plan.

Given community outreach, feedback primarily consisted of needs surrounding housing across the spectrum (rental and ownership opportunities for all income ranges) as well as specific housing needs for seniors and those with a disability. Engagement with stakeholders across the County indicated a need for

additional homelessness support; both shelters (low-barrier shelter, transitional housing, and permanent supportive housing) as well as those social support services.

There was significant need expressed for infrastructure and facility development and improvements, particularly in County pockets that may exist within or very near City bounds such as Modesto. As the economy has improved since the last Con Plan, many households have felt the impact, however there is still significant need for economic opportunities and supports to those low- and moderate-income households looking for economic opportunities through job creation, training, or other development activities.

Summary of Comments or Views Not Accepted and The Reasons For Not Accepting Them

No public comments were purposefully not included or not accepted during the development of the Consolidated Plan.

Summary

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

These goals will be used to plan for the use of CDBG, HOME, and ESG funds received by the Stanislaus Urban County and City of Turlock for the five-year period of 2020–2024. The Stanislaus Urban County and City of Turlock plan individually for the use of CDBG funds while planning cooperatively for the use of HOME funds as a HOME Consortium. The County works with the local CoC to identify gaps in services when preparing plans for the use of ESG funds.

The Process

PR-05 Lead & Responsible Agencies

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Stanislaus County	Stanislaus County Planning and Community Development
ESG Administrator	Stanislaus County	Stanislaus County Planning and Community Development
CDBG Administrator	Turlock	City of Turlock-Housing Program Services
HOME Administrator	Turlock	City of Turlock-Housing Program Services

Stanislaus County and the City of Turlock jointly completed the FY 2020-2024 Consortium Consolidated Plan in an effort to provide a comprehensive analysis of the community development needs throughout Stanislaus County.

Stanislaus County is a Community Development Block Grant (CDBG) entitlement jurisdiction, received Emergency Solutions Grant (ESG) funds, and lead for the Stanislaus Urban County, which includes the unincorporated areas of the county and the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford.

The City of Turlock is the lead agency for the City of Turlock/Stanislaus County HOME Consortium and is also a CDBG entitlement jurisdiction. The consortium includes the City of Turlock, and all of the Stanislaus Urban County member jurisdictions. In accordance with HUD regulations, Turlock is the lead entity responsible for submittal of the FY 2020-2024 Consortium Consolidated Plan for all HOME Consortium participating jurisdictions.

Stanislaus County was formed from part of Tuolumne County in 1854. The county seat was first situated at Adamsville, then moved to Empire in November, La Grange in December, and Knights Ferry in 1862, and was fixed at the present location in Modesto in 1871. According to the US Census Bureau, the county has a total area of 1,515 square miles (3,920 km²), of which 1,495 square miles (3,870 km²) is land and 20 square miles (52 km²) (1.3%) is water.

The City of Turlock was founded on December 22, 1871 and was incorporated on February 15, 1908. The City of Turlock is the second largest city in Stanislaus County after Modesto. It is located between Modesto and Merced at the intersection of State Routes 99 and 165. According to the U.S. Census Bureau, the City of Turlock has a total area of 16.9 square miles, all of which is land.

Consolidated Plan Public Contact Information

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PR-10 Consultation

Introduction

In preparing the Con Plan, the Stanislaus Urban County and City of Turlock consulted with various organizations located in the Urban County and City of Turlock that provide services to residents. In many instances, these consultations are part of ongoing interactions between Stanislaus Urban County, City of Turlock, and the agency or group described. A detailed description of the outreach process, the results, and the documentation of the outreach process is included in Appendix 5.

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

Because the Consolidated Plan is developed in conjunction with Analysis of Impediments to Fair Housing Choice (AI), meetings and consultations were often combined with feedback on fair housing issues.

Stanislaus Urban County

Meetings were held at Municipal Advisory Councils (MACs), advisory bodies of residents that exist to represent the local community to the Board of Supervisors. Meetings were also held with the Stanislaus Community System of Care and Stanislaus Homeless Alliance to talk about issues facing homeless individuals throughout the County.

Turlock

Held a meeting with the Turlock Community Collaborative, a network of public service agencies, businesses, and individuals in Turlock interested in improving the quality of life. The collaborative meets regularly to address needs in the community.

Two key large stakeholders meeting were held on January 19, 2020 and February 12, 2020. The meetings were with the Stanislaus Community System of Care (CSOC) which is the County's Continuum of Care (CoC) and the Stanislaus Homeless Alliance (SHA). The presentations and input regarding the Consolidated Plan and the AI were part of the agenda. The meeting was attended by 33 people from the following agencies and organizations:

- Disability Resource Agency for Independent Living (DRAIL)
- Modesto Gospel Mission
- United Way of Stanislaus County
- Family Promise
- Project Sentinel
- California Rural Legal Assistance
- Catholic Charities
- Community Services Agency
- United Samaritans Foundation
- City of Turlock
- Haven Woman's Center

- Community Impact Central Valley (CICV)
- Area Agency on Aging
- City of Modesto
- Turning Point Community Program
- Community Housing and Shelter Services (CHSS)
- Stanislaus County Department of Planning and Community Development
- Golden Valley Health Center
- Health Plan of San Joaquin
- Parent Resource Center
- Stanislaus Regional Housing Authority
- Stanislaus County Affordable Housing Corporation (STANCO)
- City of Turlock
- City of Riverbank
- Behavioral Health and Recovery Services
- The Salvation Army
- We Care Program
- Children's Crisis Center
- Helping Others Sleep Tonight
- Center for Human Services
- Modesto City Council members
- Community representatives

The meeting started with an overview presentation on the Consolidated Plan and Analysis of Impediments update. The presentation included an overview of the update process and schedule as well as demographic information on housing needs.

Stanislaus Urban County

- Salida MAC Meeting- October 22, 2019
- Empire MAC Meeting- October 23, 2019
- Knights Ferry MAC Meeting- October 24, 2019
- Denair MAC Meeting- November 5, 2019
- South Modesto MAC Meeting- November 14, 2019
- Stanislaus Community System of Care (CSOC) Meeting- January 16, 2020
- Stanislaus Homeless Alliance (SHA) Meeting- February 12, 2020

Upcoming

- City of Ceres City Council- Public Hearing- April 13, 2020
- City of Hughson City Council- Public Hearing- April 27, 2020
- City of Newman City Council- Public Hearing- April 28, 2020
- City of Oakdale City Council- Public Hearing- May 4, 2020
- City of Patterson City Council- Public Hearing- May 5, 2020
- City of Riverbank City Council- Public Hearing- April 28, 2020
- City of Waterford City Council- Public Hearing- May 7, 2020
- Stanislaus County Board of Supervisors- Public Hearing – May 12, 2020

Turlock

- Meeting-Turlock Community Collaborative February 18, 2020

Upcoming

- City of Turlock City Council- Public Hearing- May 12, 2020

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

Stanislaus County and City of Turlock staff collaborates with the Continuum of Care (CoC) in multiple ways. The CoC is made up of representatives from the City of Modesto, the City of Turlock, Housing Authority, Behavioral Health and Recovery Services, Child Support Services, housing service providers, social service providers, fair housing service providers, health service providers, and homeless service providers. Announcements for all funding opportunities through the County are routinely advertised at the CoC meetings.

Stanislaus County and the City of Turlock take part in regularly scheduled monthly CoC meetings and consult regularly with all attendees on housing needs, social service needs, and homelessness needs. This ongoing partnership increases shared understanding of roles and responsibilities throughout the continuum.

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

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

One workshop session with the CoC was conducted during the preparation of the 2020-2025 Stanislaus Urban County / City of Turlock Consortium Consolidated Plan. The workshop also covered fair housing topics to inform the development of the Analysis of Impediments.

A representative from the CoC participates on the panel which scores applications for the competitive CDBG Public Service and ESG grants. In addition, draft ESG and CDBG Public Services funding recommendations are presented to the Stanislaus CoC during its committee meeting for comment.

A more detailed consultation for how ESG funds are allocated and implemented occurs at the ESG/SHP/HMIS sub-committee, which takes place monthly. The sub-committee works to implement the revised ESG, SHP, and HMIS regulations, both in practice and in the HMIS system itself.

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

Funds are set aside to allow nonprofit organizations and service providers to apply through a competitive process for an ESG grant. Applications are released annually. Submitted applications are received, reviewed and scored by a review team, consisting of a representative from each Urban County member, the County CEO, and a representative from the CoC.

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

1	Agency/Group/Organization	Ceres Healthy Start Family Resource Center
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meeting s
2	Agency/Group/Organization	Area Agency on Aging
	Agency/Group/Organization Type	Services-Seniors
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meetings
3	Agency/Group/Organization	Central Valley Opportunity Center
	Agency/Group/Organization Type	Services-Education Services-Employment Food Bank
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meetings
4	Agency/Group/Organization	Haven Women's Center
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meetings
5	Agency/Group/Organization	Stanislaus Workforce Development
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meetings
6	Agency/Group/Organization	United Samaritans Foundation
	Agency/Group/Organization Type	Food Bank
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meetings
7	Agency/Group/Organization	WE CARE PROGRAM - TURLOCK
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meetings
8	Agency/Group/Organization	Project Sentinel
	Agency/Group/Organization Type	Services
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Outreach and stakeholder meetings

Identify any agency types not consulted and provide rationale for not consulting.

N/A

Describe other local/regional/state/federal planning efforts considered when preparing the Consolidated Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Stanislaus County	Homeless Strategy

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

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

PR-15 Citizen Participation

1. Summary of citizen participation process/efforts made to broaden citizen participation. Summarize citizen participation process and how it impacted goal-setting.

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

The public comment period for the Fiscal Years 2020-2024 Consortium Consolidated Plan and Fiscal Year 2020-2021 Annual Action Plan was from April 10, 2020 to May 12, 2020. A public meeting notice was published in the Modesto Bee newspaper in English and Spanish that covers the entire jurisdiction.

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response	Summary of comments received	Summary of comments not accepted	URL if applicable
CoC Meeting	Housing and homeless service organizations	One stakeholders meeting was held with the Stanislaus Housing and Support Services Collaborative Committee on January 16, 2020, at the Housing Authority of Stanislaus County in Modesto.	Generally, participants felt that the collaborative programming between the County and cities was productive and beneficial to those individuals and households receiving services.	Not applicable.	Not applicable.

SHA Meeting	Housing and homeless service organizations	One stakeholders meeting was held with the Stanislaus Homeless Alliance (SHA) on February 12, 2020.	Housing, shelter, and supportive service needs were discussed. A lack of affordable housing remains an obstacle in housing stability for those individuals and households being served throughout the County.		
Public Meeting	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	Held a meeting with the Turlock Community Collaborative, a network of public service agencies, businesses, and individuals in Turlock interested in improving the quality of life. The collaborative meets regularly to address needs in the community.	A lack of affordable housing and continued need for housing supportive services were identified.	Not applicable.	Not applicable.

Public Meeting	Non-targeted/broad community	A total of five (5) Municipal Advisory Councils (MACs) meetings took place between October and November, 2019.	Stanislaus County staff received general comments regarding the desire for sidewalks and other infrastructure improvements at several Municipal Advisory Council meetings.	Not applicable.	Not applicable.
Newspaper Ad	Non-targeted/broad community	All meetings were publicly noticed in a newspaper of general circulation (Ceres Courier, Hughson/Denair Dispatch, Modesto Bee, Newman/Gustine Westside Index, Oakdale Leader, and Patterson Irrigator	Comments were received at the community workshops. Please see above for comments from each meeting	Not applicable.	Not applicable.

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment examines needs related to affordable housing, special needs housing, community development and homelessness for the Stanislaus County cities of Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford and the unincorporated area of Stanislaus County (the Stanislaus Planning Area). The Needs Assessment includes the following sections:

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

The Needs Assessment identifies those needs with the highest priorities which form the basis for the Strategic Plan section and the programs and projects to be administered. Most of the data tables in this section are populated with default data from the 2012-2016 American Community Survey (ACS) and the Comprehensive Housing Affordability Strategy (CHAS) datasets. CHAS datasets are developed for HUD by the U.S. Census Bureau based on the ACS. In addition to these data sources, the Needs Assessment is supplemented by more current data to provide context around the significant growth experienced by the region in recent years.

NA-10 Housing Needs Assessment

Summary of Housing Needs

The housing portion of the needs assessment focuses largely on households experiencing a housing problem. HUD defines four circumstances that constitute a housing problem:

1. Units lacking complete kitchen facilities
2. Units lacking complete bathroom facilities
3. Housing cost burden of more than 30 percent of the household income (for renters, housing costs include rent paid by the tenant plus utilities and for owners, housing costs include mortgage payments, taxes, insurance, and utilities)
4. Overcrowding which is defined as more than one (1) person per room, not including bathrooms, porches, foyers, halls, or half-rooms

HUD entitlement programs, CDBG, ESG, and HOME, operate under federally established income limits.

Generally, very-low income refers to incomes at or below 30 percent of AMI; low-income refers to incomes between 31 and 50 percent of AMI; moderate-income refers to incomes between 51 and 80 percent of AMI; all adjusted for family size. The CDBG and HOME programs target low- and moderate-

income beneficiaries; except that HOME rental activities can benefit those with income up to 60% of AMI. ESG activities are assumed to benefit low- and moderate-income persons.

The following table provides the 2016 income limits subject to annual adjustments by HUD.

2016 HUD Income Limits: Stanislaus County				
Household Size	30% of Median Very Low Income	50% of Median Low Income	80% of Median Moderate Income	100% of Median
1	\$12,400	\$20,650	\$33,000	\$41,300
2	\$16,020	\$23,600	\$37,700	\$47,200
3	\$20,160	\$26,550	\$42,400	\$53,100
4	\$24,300	\$29,450	\$47,100	\$58,900
5	\$28,440	\$31,850	\$50,900	\$63,700
6	\$32,580	\$34,200	\$54,650	\$68,400
7	\$36,550	\$36,550	\$58,450	\$73,100
8	\$38,900	\$38,900	\$62,200	\$77,800

Source: U.S. Department of Housing and Urban Development (HUD); huduser.gov

The 2016 Income limits are highlighted here because the Comprehensive Housing Affordability Strategy (CHAS) data that is used throughout this Needs Assessment section is 2012-2016 data. By using the same years dataset, better comparisons and assumptions can be made. Income limits as published by HUD each year can be found at the following websites:

- CDBG Income Limits: <https://www.hudexchange.info/resource/5334/cdbg-income-limits/>
- HOME Income Limits: <https://www.hudexchange.info/programs/home/home-income-limits/>
- ESG Income Limits: <https://www.hudexchange.info/resource/5079/esg-income-limits/>

Change in Population

	Base Year: 2000	Most Recent Year: 2016	% Change
Stanislaus Planning Area	202,331	250,882	24%
Turlock	55,810	71,166	28%
Ceres	34,609	47,231	36%
Hughson	3,980	7,160	80%
Newman	7,093	10,808	52%
Oakdale	15,503	21,796	41%
Patterson	11,606	21,205	83%
Riverbank	15,826	23,761	50%
Waterford	6,924	8,708	26%

Source: 2012-2016 ACS

Change in Number of Households

	Base Year: 2000	Most Recent Year: 2016	% Change
Stanislaus Planning Area	64,533	79,250	23%
Turlock	19,095	25,759	35%
Ceres	10,773	13,589	26%
Hughson	1,252	2,530	102%
Newman	2,176	3,403	56%
Oakdale	5,805	8,141	40%
Patterson	3,262	6,005	84%
Riverbank	4,698	7,409	58%
Waterford	2,080	2,477	19%

Source: 2012-2016 ACS

Change in Median Household Income

	Base Year: 2000	2000 Adjusted for Inflation to 2016 \$	Most Recent Year: 2016	% Change
Stanislaus Planning Area	40,101	56,062	51,591	-8%
Turlock	39,050	54,593	51,555	-6%
Ceres	40,736	56,950	49,518	-13%
Hughson	40,385	56,459	54,352	-4%
Newman	39,460	55,166	51,455	-7%
Oakdale	39,338	54,995	68,195	24%
Patterson	47,780	66,797	54,195	-19%
Riverbank	44,668	62,447	61,870	-1%
Waterford	39,286	54,922	49,500	-10%

Source: 2012-2016 ACS

Number of Households Tables

The following tables identify the percentage of households in the given jurisdiction within each income bracket. The HUD Area Median Family Income (HAMFI) is a calculation of median income completed by HUD. Throughout this document Area Median Income (AMI) and HAMFI may be considered interchangeable.

Stanislaus Planning Area

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6%	8%	15%	10%	61%
Small Family Households	30%	33%	42%	43%	53%
Large Family Households	11%	14%	19%	23%	17%
Household contains at least one person 62-74 years of age	23%	33%	27%	24%	24%
Household contains at least one-person age 75 or older	20%	22%	17%	18%	9%
Households with one or more children 6 years old or younger	17%	14%	21%	23%	18%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	21%	20%	21%	10%	28%
Small Family Households	48%	47%	42%	49%	53%
Large Family Households	16%	25%	27%	23%	20%
Household contains at least one person 62-74 years of age	11%	11%	15%	9%	13%
Household contains at least one-person age 75 or older	7%	9%	6%	4%	4%
Households with one or more children 6 years old or younger	37%	41%	31%	28%	22%

Source: 2012-2016 CHAS

City of Turlock

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6%	6%	13%	11%	64%
Small Family Households	35%	22%	35%	50%	55%
Large Family Households	4%	3%	12%	17%	12%
Household contains at least one person 62-74 years of age	18%	30%	37%	27%	26%
Household contains at least one person age 75 or older	39%	31%	21%	11%	8%
Households with one or more children 6 years old or younger	10%	4%	12%	24%	16%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	22%	16%	20%	9%	33%
Small Family Households	36%	40%	41%	48%	47%
Large Family Households	4%	14%	12%	21%	20%

Household contains at least one person 62-74 years of age	15%	17%	18%	17%	10%
Household contains at least one person age 75 or older	21%	20%	5%	9%	4%
Households with one or more children 6 years old or younger	19%	17%	17%	28%	21%

Source: 2012-2016 CHAS

City of Ceres

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6%	9%	19%	11%	55%
Small Family Households	40%	39%	39%	37%	59%
Large Family Households	7%	15%	28%	33%	20%
Household contains at least one person 62-74 years of age	23%	31%	23%	20%	21%
Household contains at least one person age 75 or older	16%	21%	16%	24%	9%
Households with one or more children 6 years old or younger	22%	17%	26%	20%	20%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	21%	22%	22%	9%	26%
Small Family Households	45%	63%	39%	53%	50%
Large Family Households	19%	12%	32%	24%	32%
Household contains at least one person 62-74 years of age	11%	4%	15%	18%	8%
Household contains at least one person age 75 or older	8%	8%	9%	17%	5%
Households with one or more children 6 years old or younger	36%	38%	36%	35%	30%

Source: 2012-2016 CHAS

City of Hughson

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	5%	11%	11%	10%	64%
Small Family Households	50%	66%	59%	67%	73%
Large Family Households	50%	0%	24%	13%	16%
Household contains at least one person 62-74 years of age	0%	44%	18%	0%	12%

Household contains at least one person age 75 or older	0%	19%	6%	30%	7%
Households with one or more children 6 years old or younger	71%	0%	18%	17%	36%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	27%	16%	25%	10%	22%
Small Family Households	56%	19%	60%	44%	22%
Large Family Households	11%	0%	14%	0%	0%
Household contains at least one person 62-74 years of age	7%	26%	0%	0%	25%
Household contains at least one person age 75 or older	13%	59%	29%	38%	17%
Households with one or more children 6 years old or younger	24%	0%	0%	44%	6%

Source: 2012-2016 CHAS

City of Newman

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	10%	3%	16%	22%	49%
Small Family Households	34%	83%	61%	59%	52%
Large Family Households	8%	17%	3%	17%	16%
Household contains at least one person 62-74 years of age	71%	17%	23%	15%	19%
Household contains at least one person age 75 or older	16%	0%	3%	23%	8%
Households with one or more children 6 years old or younger	8%	83%	34%	12%	12%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	14%	20%	22%	15%	29%
Small Family Households	46%	22%	64%	19%	46%
Large Family Households	9%	68%	5%	19%	36%
Household contains at least one person 62-74 years of age	23%	14%	25%	5%	36%
Household contains at least one person age 75 or older	14%	6%	14%	0%	0%
Households with one or more children 6 years old or younger	49%	58%	30%	38%	45%

Source: 2012-2016 CHAS

City of Oakdale

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4%	10%	8%	8%	70%
Small Family Households	17%	9%	33%	56%	51%
Large Family Households	0%	28%	11%	0%	13%
Household contains at least one person 62-74 years of age	6%	43%	39%	27%	24%
Household contains at least one person age 75 or older	26%	19%	24%	7%	10%
Households with one or more children 6 years old or younger	6%	17%	6%	20%	18%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	22%	21%	24%	10%	22%
Small Family Households	53%	48%	42%	46%	67%
Large Family Households	1%	14%	15%	12%	5%
Household contains at least one person 62-74 years of age	5%	14%	12%	17%	7%
Household contains at least one person age 75 or older	7%	14%	2%	0%	5%
Households with one or more children 6 years old or younger	44%	25%	32%	29%	10%

Source: 2012-2016 CHAS

City of Patterson

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	7%	10%	14%	11%	58%
Small Family Households	33%	24%	57%	30%	55%
Large Family Households	24%	25%	9%	38%	24%
Household contains at least one person 62-74 years of age	6%	26%	33%	36%	17%
Household contains at least one person age 75 or older	14%	31%	9%	5%	6%
Households with one or more children 6 years old or younger	24%	26%	11%	49%	27%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	20%	11%	17%	14%	37%
Small Family Households	37%	70%	42%	34%	60%
Large Family Households	24%	4%	42%	44%	13%
Household contains at least one person 62-74 years of age	10%	22%	9%	11%	19%

Household contains at least one person age 75 or older	14%	2%	0%	0%	0%
Households with one or more children 6 years old or younger	39%	64%	43%	39%	16%

Source: 2012-2016 CHAS

City of Riverbank

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	3%	5%	14%	12%	65%
Small Family Households	38%	37%	49%	29%	50%
Large Family Households	6%	4%	15%	50%	19%
Household contains at least one person 62-74 years of age	22%	48%	23%	16%	21%
Household contains at least one person age 75 or older	19%	7%	24%	15%	6%
Households with one or more children 6 years old or younger	18%	15%	14%	31%	24%
RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	18%	19%	20%	11%	31%
Small Family Households	34%	35%	59%	49%	48%
Large Family Households	12%	30%	23%	27%	21%
Household contains at least one person 62-74 years of age	19%	11%	6%	8%	2%
Household contains at least one person age 75 or older	9%	20%	1%	6%	10%
Households with one or more children 6 years old or younger	22%	44%	47%	47%	10%

Source: 2012-2016 CHAS

City of Waterford

OWNER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6%	9%	17%	8%	60%
Small Family Households	74%	36%	47%	48%	50%
Large Family Households	4%	43%	32%	12%	20%
Household contains at least one person 62-74 years of age	16%	14%	26%	44%	31%
Household contains at least one person age 75 or older	0%	11%	9%	0%	1%
Households with one or more children 6 years old or younger	4%	18%	11%	15%	18%

RENTER	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	24%	21%	23%	9%	23%
Small Family Households	60%	8%	18%	100%	74%
Large Family Households	5%	67%	44%	0%	10%
Household contains at least one person 62-74 years of age	0%	2%	10%	0%	2%
Household contains at least one person age 75 or older	5%	14%	5%	0%	13%
Households with one or more children 6 years old or younger	40%	67%	8%	0%	36%

Source: 2012-2016 CHAS

Housing Needs Summary Tables

The following tables identify housing needs by both income bracket and by renter/owner. The housing problems are identified as follows:

1. Units lacking complete kitchen facilities;
2. Units lacking complete bathroom facilities;
3. Housing cost burden of more than 30 percent of the household income (for renters, housing costs include rent paid by the tenant plus utilities and for owners, housing costs include mortgage payments, taxes, insurance, and utilities); and
 - a. A cost burden over 50% is considered severely-cost burdened
4. Overcrowding which is defined as more than one person per room, not including bathrooms, porches, foyers, halls, or half-rooms.
 - a. Overcrowding that is more than 1.5 persons per room, is considered severely overcrowded

In all of the tables below, going down the rows indicates that those households experience only that particular housing problem, and not the listed housing problem in any row indicated above it.

Note: The tables on the following pages were produced using Integrated Disbursement Information System (IDIS) HUD's online reporting system. The table's "Total" column in these tables includes all households, even those households earning above 100% AMI. That means the table "Total" column may not always equal the entirety of the row.

Stanislaus Planning Area

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	130	60	10	-		10	36	31	4	165
Severely Overcrowded – >1.51 people per room	240	130	150	45	750	15	-	185	35	540
Overcrowded - 1.01-1.5 people per room	575	910	745	315	2,960	75	130	420	345	1,740
Housing cost burden greater than 50% of income	3,835	2,190	530	56	6,665	1,755	1,200	1,305	380	5,170
Housing cost burden greater than 30% of income	450	1,925	2,630	605	6,105	320	860	1,960	1,455	7,620
Zero/negative Income	435	-	-	-	435	250	-	-	-	250

Source: 2012-2016 CHAS

City of Turlock

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	90	35	30	95	280	20	4	-	-	40
Severely Overcrowded – >1.51 people per room	105	65	90	15	295	20	-	20	-	110
Overcrowded - 1.01-1.5 people per room	70	180	260	45	800	20	-	100	100	430
Housing cost burden greater than 50% of income	1,740	905	170	4	2,830	465	300	305	160	1,320
Housing cost burden greater than 30% of income	240	555	1,190	175	2,290	170	150	530	550	2,125
Zero/negative Income	140	-	-	-	140	-	-	-	-	-

Source: 2012-2016 CHAS

City of Ceres

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	4	25	-	-	30	-	-	10	4	45
Severely Overcrowded – >1.51 people per room	45	20	40	-	135	-	-	20	-	50
Overcrowded - 1.01-1.5 people per room	150	45	85	110	525	-	25	150	105	460
Housing cost burden greater than 50% of income	760	485	30	-	1,275	330	340	195	15	900
Housing cost burden greater than 30% of income	85	395	620	135	1,305	75	110	630	285	1,615
Zero/negative Income	25	-	-	-	25	15	-	-	-	15

Source: 2012-2016 CHAS

City of Hughson

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	-	-	-	-	-	-	-	-	-	-
Severely Overcrowded – >1.51 people per room	-	-	-	-	-	-	-	-	-	-
Overcrowded - 1.01-1.5 people per room	25	-	-	-	25	-	-	10	10	40
Housing cost burden greater than 50% of income	185	85	105	30	440	70	45	75	-	215
Housing cost burden greater than 30% of income	15	25	45	35	120	-	15	60	40	180
Zero/negative Income	-	-	-	-	-	-	-	-	-	-

Source: 2012-2016 CHAS

City of Newman

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	15	-	-	-	15	-	-	-	-	-
Severely Overcrowded – >1.51 people per room	-	-	-	-	-	-	-	-	-	-
Overcrowded - 1.01-1.5 people per room	15	45	-	35	130	-	-	10	-	55
Housing cost burden greater than 50% of income	55	110	40	-	205	140	40	40	65	280
Housing cost burden greater than 30% of income	40	95	130	10	300	15	-	175	40	280
Zero/negative Income	-	-	-	-	-	20	-	-	-	20

Source: 2012-2016 CHAS

City of Oakdale

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	20	-	-	-	20	-	-	-	-	-
Severely Overcrowded – >1.51 people per room	-	15	-	-	15	-	-	-	-	-
Overcrowded - 1.01-1.5 people per room	10	65	80	-	155	-	75	-	-	100
Housing cost burden greater than 50% of income	405	230	95	-	725	80	110	160	90	485
Housing cost burden greater than 30% of income	195	290	320	100	1,020	25	120	80	160	730
Zero/negative Income	50	-	-	-	50	55	-	-	-	55

Source: 2012-2016 CHAS

City of Patterson

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	15	-	10	-	25	-	15	-	-	15
Severely Overcrowded – >1.51 people per room	65	-	10	-	80	-	-	50	4	80
Overcrowded - 1.01-1.5 people per room	-	15	-	35	90	15	-	4	70	120
Housing cost burden greater than 50% of income	340	145	40	-	530	240	55	105	-	500
Housing cost burden greater than 30% of income	10	40	200	125	450	-	205	170	160	785
Zero/negative Income	25	-	-	-	25	-	-	-	-	-

Source: 2012-2016 CHAS

City of Riverbank

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	-	-	-	-	-	-	10	-	-	45
Severely Overcrowded – >1.51 people per room	35	10	4	-	65	-	-	-	-	15
Overcrowded - 1.01-1.5 people per room	25	70	45	35	175	-	-	10	65	185
Housing cost burden greater than 50% of income	210	190	60	-	465	110	120	90	25	355
Housing cost burden greater than 30% of income	4	95	185	-	315	4	40	175	205	810
Zero/negative Income	55	-	-	-	55	25	-	-	-	25

Source: 2012-2016 CHAS

City of Waterford

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Substandard Housing – No complete plumbing or kitchen facilities	20	-	-	-	20	-	-	10	-	10
Severely Overcrowded – >1.51 people per room	-	25	40	-	65	-	-	-	-	-
Overcrowded - 1.01-1.5 people per room	-	95	30	-	135	-	-	25	-	95
Housing cost burden greater than 50% of income	135	25	-	-	155	95	50	10	-	195
Housing cost burden greater than 30% of income	10	35	45	10	105	-	55	95	55	285
Zero/negative Income	15	-	-	-	15	-	-	-	-	-

Source: 2012-2016 CHAS

Severe Housing Problems

The following tables identify households with severe housing problems by both income bracket and by renter/owner. The severe housing problems are identified as follows:

1. Units lacking complete kitchen facilities;
2. Units lacking complete bathroom facilities;
3. Housing cost burden of more than 50 percent of the household income (for renters, housing costs include rent paid by the tenant plus utilities and for owners, housing costs include mortgage payments, taxes, insurance, and utilities); and
4. Overcrowding which is defined as more than one and a half (1.5) persons per room, not including bathrooms, porches, foyers, halls, or half-rooms.

Stanislaus Planning Area

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	5,220	5,220	4,060	1,020	16,710	2,175	2,230	3,905	2,230	15,245
Having no housing problems	440	730	2,170	2,010	12,280	365	1,210	2,915	2,425	29,815
Household has negative income, but no housing problems	435	-	-	-	435	250	-	-	-	250

Source: 2012-2016 CHAS

City of Turlock

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	2,245	1,735	1,745	330	6,495	695	455	955	810	4,025
Having no housing problems	240	105	645	680	5,055	65	275	710	600	8,705
Household has negative income, but no housing problems	140	-	-	-	140	-	-	-	-	-

Source: 2012-2016 CHAS

City of Ceres

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Having 1 or more housing problems	1,045	970	770	245	3,275	405	470	1,005	415	3,075
Having no housing problems	25	180	365	225	1,930	15	190	490	450	4,630
Household has negative income, but no housing problems	25	-	-	-	25	15	-	-	-	15

Source: 2012-2016 CHAS

City of Hughson

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	225	110	150	65	580	70	60	150	50	435
Having no housing problems	-	25	60	15	250	-	100	20	100	1,080
Household has negative income, but no housing problems	-	-	-	-	-	-	-	-	-	-

Source: 2012-2016 CHAS

City of Newman

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	125	250	170	50	645	155	40	225	100	610
Having no housing problems	50	-	110	135	610	15	25	80	330	1,310
Household has negative income, but no housing problems	-	-	-	-	-	20	-	-	-	20

Source: 2012-2016 CHAS

City of Oakdale

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	630	600	490	100	1,935	110	305	235	250	1,315
Having no housing problems	40	60	285	220	1,215	15	125	120	100	3,040
Household has negative income, but no housing problems	50	-	-	-	50	55	-	-	-	55

Source: 2012-2016 CHAS

City of Patterson

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	430	200	260	160	1,175	255	280	330	235	1,505
Having no housing problems	10	50	135	160	1,090	-	65	130	145	1,930
Household has negative income, but no housing problems	25	-	-	-	25	-	-	-	-	-

Source: 2012-2016 CHAS

City of Riverbank

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	275	360	295	35	1,020	115	165	275	300	1,410
Having no housing problems	105	95	180	220	1,280	20	65	385	280	3,215
Household has negative income, but no housing problems	55	-	-	-	55	25	-	-	-	25

Source: 2012-2016 CHAS

City of Waterford

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more housing problems	165	180	120	10	480	95	105	145	55	585
Having no housing problems	20	-	75	70	350	-	35	120	75	975
Household has negative income, but no housing problems	15	-	-	-	15	-	-	-	-	-

Source: 2012-2016 CHAS

Cost Burden > 30%

The tables below identify households that are paying more than 30% of their monthly income towards housing costs. It is important to note that housing costs here include utilities, taxes, and insurance.

Stanislaus Planning Area

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,700	2,450	1,550	6,700	675	816	1,780	3,271
Large Related	940	1,115	930	2,985	50	370	540	960
Elderly	689	615	380	1,684	750	750	965	2,465
Other	785	670	615	2,070	447	240	175	862
Total need by income	5,114	4,850	3,475	13,439	1,922	2,176	3,460	7,558

Source: 2012-2016 CHAS

City of Turlock

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	920	675	590	2,185	260	109	400	769
Large Related	95	220	145	460	20	25	130	175
Elderly	665	505	365	1,535	310	235	335	880
Other	550	315	415	1,280	79	90	40	209
Total need by income	2,230	1,715	1,515	5,460	669	459	905	2,033

Source: 2012-2016 CHAS

City of Ceres

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	475	620	289	1,384	150	190	425	765
Large Related	195	110	200	505	-	95	225	320
Elderly	149	74	75	298	95	140	205	440
Other	195	155	140	490	125	44	30	199
Total need by income	1,014	959	704	2,677	370	469	885	1,724

Source: 2012-2016 CHAS

City of Hughson

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Small Related	125	25	80	230	35	45	100	180
Large Related	25	-	30	55	-	-	30	30
Elderly	45	85	45	175	-	15	-	15
Other	35	-	-	35	-	-	10	10
Total need by income	230	110	155	495	35	60	140	235

Source: 2012-2016 CHAS

City of Newman

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Small Related	80	60	120	260	65	40	175	280
Large Related	15	120	15	150	-	-	10	10
Elderly	15	15	25	55	60	-	40	100
Other	15	10	10	35	15	-	-	15
Total need by income	125	205	170	500	140	40	225	405

Source: 2012-2016 CHAS

City of Oakdale

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	320	270	190	780	10	30	70	110
Large Related	10	95	55	160	-	85	40	125
Elderly	80	160	40	280	45	160	130	335
Other	195	80	145	420	55	25	-	80
Total need by income	605	605	430	1,640	110	300	240	650

Source: 2012-2016 CHAS

City of Patterson

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	175	170	65	410	85	75	160	320
Large Related	110	4	164	278	-	85	14	99
Elderly	110	20	-	130	50	85	110	245
Other	40	-	20	60	65	35	4	104
Total need by income	435	194	249	878	200	280	288	768

Source: 2012-2016 CHAS

City of Riverbank

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	140	115	160	415	40	65	165	270
Large Related	50	110	55	215	10	10	35	55
Elderly	35	35	8	78	64	55	44	163
Other	44	70	30	144	10	19	29	58
Total need by income	269	330	253	852	124	149	273	546

Source: 2012-2016 CHAS

City of Waterford

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	120	14	4	138	70	35	75	180
Large Related	10	100	15	125	-	60	25	85
Elderly	-	30	15	45	15	10	20	45
Other	10	10	15	35	4	-	-	4
Total need by income	140	154	49	343	89	105	120	314

Source: 2012-2016 CHAS

Cost Burden > 50%

The tables on the following pages identify households that are paying more than 50% of their monthly income towards housing costs. It is important to note that housing costs here include utilities, taxes, and insurance.

Stanislaus Planning Area

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	2,410	1,085	160	3,655	555	535	695	1,785
Large Related	860	405	90	1,355	25	170	155	350
Elderly	540	365	165	1,070	620	365	455	1,440
Other	675	485	120	1,280	400	215	60	675
Total need by income	4,485	2,340	535	7,360	1,600	1,285	1,365	4,250

Source: 2012-2016 CHAS

City of Turlock

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	890	375	40	1,305	250	105	110	465
Large Related	95	70	15	180	10	0	0	10
Elderly	475	320	110	905	150	150	160	460
Other	530	240	15	785	75	50	40	165
Total need by income	1,990	1,005	180	3,175	485	305	310	1,100

Source: 2012-2016 CHAS

City of Ceres

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	435	295	4	734	115	160	125	400
Large Related	155	40	0	195	0	40	60	100
Elderly	95	34	0	129	70	100	30	200
Other	165	135	25	325	115	40	0	155
Total need by income	850	504	29	1,383	300	340	215	855

Source: 2012-2016 CHAS

City of Hughson

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	125	0	45	170	35	45	50	130
Large Related	25	0	30	55	0	0	30	30
Elderly	30	85	30	145	0	0	0	0
Other	35	0	0	35	0	0	0	0
Total need by income	215	85	105	405	35	45	80	160

Source: 2012-2016 CHAS

City of Newman

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	40	15	0	55	50	40	40	130
Large Related	15	85	0	100	0	0	0	0
Elderly	0	0	25	25	60	0	0	60
Other	15	10	10	35	15	0	0	15
Total need by income	70	110	35	215	125	40	40	205

Source: 2012-2016 CHAS

City of Oakdale

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	230	65	10	305	0	15	55	70
Large Related	0	25	0	25	0	85	0	85
Elderly	30	130	15	175	45	70	105	220
Other	140	50	70	260	40	10	0	50
Total need by income	400	270	95	765	85	180	160	425

Source: 2012-2016 CHAS

City of Patterson

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	115	145	35	295	85	15	45	145
Large Related	110	0	4	114	0	25	4	29
Elderly	110	0	0	110	50	0	55	105
Other	40	0	0	40	65	35	4	104
Total need by income	375	145	39	559	200	75	108	383

Source: 2012-2016 CHAS

City of Riverbank

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	140	80	40	260	40	45	75	160
Large Related	40	50	15	105	0	0	10	10
Elderly	35	0	4	39	60	55	4	119
Other	40	60	0	100	10	15	4	29
Total need by income	255	190	59	504	110	115	93	318

Source: 2012-2016 CHAS

City of Waterford

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	120	10	0	130	70	35	10	115
Large Related	10	10	0	20	0	15	0	15
Elderly	0	0	0	0	15	0	0	15
Other	0	10	0	10	4	0	0	4
Total need by income	130	30	0	160	89	50	10	149

Source: 2012-2016 CHAS

Crowding (More than one person per room.)

The tables below identify households that are experiencing overcrowding, meaning there are more than one person per room, not including bathrooms, porches, foyers, halls, or half-rooms.

Stanislaus Planning Area

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	720	795	715	250	2,480	56	140	330	245	771
Multiple, unrelated family households	95	226	150	115	586	30	0	280	145	455
Other, non-family households	20	20	26	0	66	4	0	4	0	8
Total need by income	835	1,041	891	365	3,132	90	140	614	390	1,234

Source: 2012-2016 CHAS

City of Turlock

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	175	220	330	35	760	14	0	110	70	194
Multiple, unrelated family households	0	24	0	25	49	20	0	10	25	55
Other, non-family households	0	0	40	40	80	0	0	0	0	0
Total need by income	175	244	370	100	889	34	0	120	95	249

Source: 2012-2016 CHAS

City of Ceres

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	185	50	65	50	350	0	25	75	80	180
Multiple, unrelated family households	4	14	34	60	112	0	0	95	25	120
Other, non-family households	0	0	25	0	25	0	0	0	0	0
Total need by income	189	64	124	110	487	0	25	170	105	300

Source: 2012-2016 CHAS

City of Hughson

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	25	0	0	0	25	0	0	10	0	10
Multiple, unrelated family households	0	0	0	0	0	0	0	0	10	10
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	25	0	0	0	25	0	0	10	10	20

Source: 2012-2016 CHAS

City of Newman

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	15	0	0	35	50	0	0	10	0	10
Multiple, unrelated family households	0	45	0	0	45	0	0	0	0	0
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	15	45	0	35	95	0	0	10	0	10

Source: 2012-2016 CHAS

City of Oakdale

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	10	80	80	0	170	0	75	0	0	75
Multiple, unrelated family households	0	0	0	0	0	0	0	0	0	0
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	10	80	80	0	170	0	75	0	0	75

Source: 2012-2016 CHAS

City of Patterson

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	65	15	20	35	135	15	0	54	24	93
Multiple, unrelated family households	0	0	0	0	0	0	0	4	50	54
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	65	15	20	35	135	15	0	58	74	147

Source: 2012-2016 CHAS

City of Riverbank

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	60	35	19	15	129	0	0	10	45	55
Multiple, unrelated family households	0	45	35	25	105	0	0	4	20	24
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	60	80	54	40	234	0	0	14	65	79

Source: 2012-2016 CHAS

City of Waterford

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	0	120	70	0	190	0	0	25	0	25
Multiple, unrelated family households	0	0	0	0	0	0	0	0	0	0
Other, non-family households	20	0	0	0	20	0	0	0	0	0
Total need by income	20	120	70	0	210	0	0	25	0	25

Source: 2012-2016 CHAS

Households with Children Present

The tables below identify those renter and owner households with children under the age of six present. The tables are broken apart by renter and owner household and also by income bracket.

Households with Children Present

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Stanislaus Planning Area	2,240	2,410	1,945	11,775	470	466	1451	8,426
Turlock	495	315	400	3,640	75	30	200	1,930
Ceres	395	440	405	2,080	95	115	395	1,649
Hughson	55	0	0	200	50	0	30	450
Newman	85	145	85	560	15	50	105	330
Oakdale	315	165	250	1,229	10	75	20	745
Patterson	180	159	170	1,344	60	90	50	930
Riverbank	95	200	225	1,190	29	34	90	1,063
Waterford	80	120	15	285	4	25	30	248

Source: 2012-2016 CHAS

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

According to the 2016 American Community Survey (ACS) in the Stanislaus County Planning Area there are about 12,000 single-person households, and about 5,750 in Turlock. The majority of single-person households in both jurisdictions are renter households. In the Stanislaus County Planning Area, of all renter households, 18% are single-person, while in Turlock of all renter households, 27% are single-person. The percentages among owner households are 15% and 21% respectively.

Given the tables above showing that approximately 20% of all households earning less than 20% experience at least one housing problem, we could apply this rate to the single-person households identified above.

In the Stanislaus County Planning Area we could conservatively assume that there are about 2,500 single-person households that may experience a housing problem, thus be in need of housing assistance. Similarly, in Turlock we can conservatively assume that there are approximately 1,150 single-person households experiencing a housing problem.

It is important to note that data below will also show that elderly households are overrepresented in single-person households and often are in need of services beyond just housing assistance.

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

The Haven Women's Center, from July 1, 2017 to June 30, 2018, served a total of 2,524 victims of domestic violence. Of those 2,524 individuals, just over 2,000 of those victims were supported for domestic violence abuse, 472 were supported for sexual assault abuse, and 43 were provided services for sex trafficking. In some cases, individuals were provided services for both domestic violence and sexual assault. The Haven Women's Center also tracks emergency response services as well as its support on the provision of legal assistance resulting in restraining orders. Between 2017 and 2018, the Haven Women's Center responded to 238 emergency situations and supported a legal assessment for 336 individuals, 272 of those resulting in restraining orders.

Domestic violence is a significant cause of homelessness for women and families. Financial stress can make it difficult for victims to leave an abusive situation. This issue is compounded in a housing market with few available and affordable options.

What are the most common housing problems?

The tables above outline that overwhelmingly the most common housing problem experienced by households in the Stanislaus County Planning Area and Turlock is cost burden, both at 30% and notably at 50% cost burden.

Of all households in the Stanislaus County Planning Area, 28% are households that experience cost burden and 30% of all households in Turlock. These numbers both go up significantly when only considering those households earning 80% AMI or less.

Overcrowding is a housing problem experienced by a smaller number of households; however, this housing problem has increased over time. Overcrowding is often seen in housing markets that are tight where lower income households may be put into positions where they rent a unit that is affordable but does not adequately fit their household.

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

In both the Stanislaus County Planning Area and Turlock, low-income renter households experience housing problems at higher rates. In the Stanislaus County Planning Area 49% of renter households both earning less than 80% AMI and experiencing a housing problem. While 23% of all owner households are low-income households experiencing a housing problem.

In Turlock, 49% of all renter households are low-income and experiencing a housing problem. While 17% of all owner households in Turlock are low-income households experiencing a housing problem.

In both jurisdictions, small family households make up the majority of the household type experiencing housing problems followed by elderly households. The rate of housing problems experienced by elderly households is however greater than small family households, meaning those elderly households make up a smaller portion of households throughout the County, however they do experience housing problems at a disproportionately higher rate.

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

The fewer financial resources a household has, the greater their risk of homelessness. Throughout the County, those households earning less than 50% AMI are more likely to be in unstable work situations. A household with few financial resources is a medical emergency or a layoff at work away from being unsheltered or unstably housed. These households with few financial resources, on social security disability income (SSDI), or a fixed income, are at the greatest risk of becoming homeless.

Households nearing the end of their RRH assistance will need to stay engaged with the system to ensure wrap-around services.

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

The Stanislaus Community System of Care (CSOC), is the locally recognized Continuum of Care (CoC) uses HMIS to collect and track data on housing and services to persons experiencing homelessness and at-risk

of homelessness. The CSOC utilize HUD’s official definition of at-risk for homelessness released in January 2012. There are three categories to the definition:

1. Individuals and Families
2. Unaccompanied Children and Youth
3. Families with Children and Youth.

For a complete list of defining characteristics for each category please see the following link:

https://files.hudexchange.info/resources/documents/AtRiskofHomelessnessDefinition_Criteria.pdf

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

The household characteristics that are most closely linked to housing instability and increased risk of homelessness are cost burden and household income. Those households that are both low-income and cost burdened are the most vulnerable because these households have the least capacity for saving income towards addressing emergency situations that may arise. Similarly, those low-income households caring for members of the households that are either elderly and/or living with a disability are at increased risk of homelessness of housing instability.

NA-15 Disproportionately Greater Need: Housing Problems

Introduction

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten (10) percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The tables below indicate the share of households by race/ethnicity and income level experiencing one or more of the four housing problems. The four housing problems are:

1. Housing unit lacks complete kitchen facilities;
2. Housing unit lacks complete plumbing facilities;
3. More than one person per room (overcrowded);
4. Household is cost burdened (between 30 and 50 percent of income is devoted to housing costs).

Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of households with one or more housing problems from each race/ethnicity and comparing that figure to the share of all households in the given jurisdiction at that income level experiencing the problem. The “Share” column below is equal to the number of households for that race/ethnicity with one or more housing problem divided by the total number of households for that race/ethnicity (# of households for a given race/ethnicity with a housing problem / total # of households for that race/ethnicity).

0%-30% of Area Median Income

Stanislaus Planning Area

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	7,395	805	685	83.2%
White	2,785	505	410	75.3%
Black / African American	330	-	10	97.1%
Asian	220	50	15	77.2%
American Indian, Alaska Native	30	-	-	100.0%
Pacific Islander	50	-	10	83.3%
Hispanic	3,875	215	215	90.0%

Source: 2012-2016 CHAS

City of Turlock

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	2,940	305	140	86.9%
White	1,520	205	40	86.1%
Black / African American	145	25	20	76.3%
Asian	125	-	65	65.8%
American Indian, Alaska Native	-	-	-	-
Pacific Islander	50	-	-	100.0%
Hispanic	1,025	45	20	94.0%

Source: 2012-2016 CHAS

City of Ceres

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	1,450	40	40	94.8%
White	490	30	19	90.9%
Black / African American	85	-	-	100.0%
Asian	80	10	-	88.9%
American Indian, Alaska Native	-	-	-	-
Pacific Islander	40	-	10	80.0%
Hispanic	745	-	10	98.7%

Source: 2012-2016 CHAS

City of Hughson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	295	-	-	100.0%
White	95	-	-	100.0%
Black / African American	-	-	-	-
Asian	20	-	-	100.0%
American Indian, Alaska Native	-	-	-	-
Pacific Islander	-	-	-	-
Hispanic	180	-	-	100.0%

Source: 2012-2016 CHAS

City of Newman

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	280	65	20	76.7%
White	40	50	-	44.4%
Black / African American	10	-	-	100.0%
Asian	20	-	-	100.0%
American Indian, Alaska Native	-	-	-	-
Pacific Islander	-	-	-	-
Hispanic	210	15	20	85.7%

Source: 2012-2016 CHAS

City of Oakdale

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	740	55	105	82.2%
White	520	55	85	78.8%
Black / African American	90	-	-	100.0%
Asian	-	-	-	-
American Indian, Alaska Native	-	-	-	-
Pacific Islander	-	-	-	-
Hispanic	120	-	-	100.0%

Source: 2012-2016 CHAS

City of Patterson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	685	10	25	95.1%
White	85	-	25	77.3%
Black / African American	10	-	-	100.0%
Asian	-	-	-	-
American Indian, Alaska Native	-	-	-	-
Pacific Islander	-	-	-	-
Hispanic	590	10	-	98.3%

Source: 2012-2016 CHAS

City of Riverbank

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	390	125	80	65.5%
White	170	65	10	69.4%
Black / African American	-	-	15	-
Asian	-	20	-	-
American Indian, Alaska Native	-	-	-	-
Pacific Islander	-	-	-	-
Hispanic	200	40	55	67.8%

Source: 2012-2016 CHAS

City of Waterford

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	260	20	15	88.1%
White	140	-	15	90.3%
Black / African American	10	-	-	100.0%
Asian	-	20	-	-
American Indian, Alaska Native	-	-	-	-
Pacific Islander	10	-	-	100.0%
Hispanic	100	-	-	100.0%

Source: 2012-2016 CHAS

30%-50% of Area Median Income

Stanislaus Planning Area

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	7,450	1,940	0	79.3%
White	2,695	940	0	74.1%
Black / African American	125	-	0	100.0%
Asian	165	55	0	75.0%
American Indian, Alaska Native	71	11	0	86.6%
Pacific Islander	35	10	0	77.8%
Hispanic	4,265	860	0	83.2%

Source: 2012-2016 CHAS

City of Turlock

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	2,190	380	0	85.2%
White	1,370	290	0	82.5%
Black / African American	10	-	0	100.0%
Asian	75	10	0	88.2%
American Indian, Alaska Native	4	-	0	100.0%
Pacific Islander	-	-	0	-
Hispanic	690	65	0	91.4%

Source: 2012-2016 CHAS

City of Ceres

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	1,440	370	0	79.6%
White	535	135	0	79.9%
Black / African American	60	-	0	100.0%
Asian	30	45	0	40.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	805	170	0	82.6%

Source: 2012-2016 CHAS

City of Hughson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	170	125	0	57.6%
White	100	80	0	55.6%
Black / African American	-	-	0	-
Asian	-	-	0	-
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	70	45	0	60.9%

Source: 2012-2016 CHAS

City of Newman

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	290	25	0	92.1%
White	25	10	0	71.4%
Black / African American	-	-	0	-
Asian	-	-	0	-
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	265	10	0	96.4%

Source: 2012-2016 CHAS

City of Oakdale

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	905	185	0	83.0%
White	530	85	0	86.2%
Black / African American	20	-	0	100.0%
Asian	-	10	0	0.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	330	70	0	82.5%

Source: 2012-2016 CHAS

City of Patterson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	480	115	0	80.7%
White	145	54	0	72.9%
Black / African American	-	-	0	-
Asian	15	-	0	100.0%
American Indian, Alaska Native	25	-	0	100.0%
Pacific Islander	10	-	0	100.0%
Hispanic	285	50	0	85.1%

Source: 2012-2016 CHAS

City of Riverbank

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	525	160	0	76.6%
White	185	100	0	64.9%
Black / African American	-	-	0	-
Asian	-	-	0	-
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	330	60	0	84.6%

Source: 2012-2016 CHAS

City of Waterford

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	285	35	0	89.1%
White	75	35	0	68.2%
Black / African American	10	-	0	100.0%
Asian	-	-	0	-
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	195	-	0	100.0%

Source: 2012-2016 CHAS

50%-80% of Area Median Income

Stanislaus Planning Area

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	7,965	5,085	0	61.0%
White	2,955	2,665	0	52.6%
Black / African American	85	50	0	63.0%
Asian	270	55	0	83.1%
American Indian, Alaska Native	55	20	0	73.3%
Pacific Islander	24	16	0	60.0%
Hispanic	4,450	2,215	0	66.8%

Source: 2012-2016 CHAS

City of Turlock

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	2,700	1,355	0	66.6%
White	1,455	775	0	65.2%
Black / African American	50	-	0	100.0%
Asian	125	25	0	83.3%
American Indian, Alaska Native	25	-	0	100.0%
Pacific Islander	-	-	0	-
Hispanic	995	535	0	65.0%

Source: 2012-2016 CHAS

City of Ceres

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	1,775	855	0	67.5%
White	395	385	0	50.6%
Black / African American	-	20	0	0.0%
Asian	100	-	0	100.0%
American Indian, Alaska Native	34	10	0	77.3%
Pacific Islander	-	-	0	-
Hispanic	1,235	430	0	74.2%

Source: 2012-2016 CHAS

City of Hughson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	300	80	0	78.9%
White	210	40	0	84.0%
Black / African American	-	-	0	-
Asian	-	-	0	-
American Indian, Alaska Native	-	10	0	0.0%
Pacific Islander	-	-	0	-
Hispanic	95	30	0	76.0%

Source: 2012-2016 CHAS

City of Newman

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	395	190	0	67.5%
White	75	75	0	50.0%
Black / African American	-	-	0	-
Asian	10	30	0	25.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	295	85	0	77.6%

Source: 2012-2016 CHAS

City of Oakdale

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	725	405	0	64.2%
White	430	285	0	60.1%
Black / African American	-	-	0	-
Asian	-	10	0	0.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	280	120	0	70.0%

Source: 2012-2016 CHAS

City of Patterson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	590	265	0	69.0%
White	180	155	0	53.7%
Black / African American	25	-	0	100.0%
Asian	80	-	0	100.0%
American Indian, Alaska Native	10	-	0	100.0%
Pacific Islander	4	-	0	100.0%
Hispanic	300	115	0	72.3%

Source: 2012-2016 CHAS

City of Riverbank

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	570	565	0	50.2%
White	200	185	0	51.9%
Black / African American	20	15	0	57.1%
Asian	4	15	0	21.1%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	20	-	0	100.0%
Hispanic	320	320	0	50.0%

Source: 2012-2016 CHAS

City of Waterford

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	265	195	0	57.6%
White	75	80	0	48.4%
Black / African American	-	-	0	-
Asian	30	-	0	100.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	155	115	0	57.4%

Source: 2012-2016 CHAS

80%-100% of Area Median Income

Stanislaus Planning Area

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	3,250	4,435	0	42.3%
White	1,590	2,255	0	41.4%
Black / African American	65	85	0	43.3%
Asian	135	115	0	54.0%
American Indian, Alaska Native	10	20	0	33.3%
Pacific Islander	-	-	0	-
Hispanic	1,375	1,915	0	41.8%

Source: 2012-2016 CHAS

City of Turlock

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	1,140	1,280	0	47.1%
White	610	745	0	45.0%
Black / African American	20	105	0	16.0%
Asian	105	25	0	80.8%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	400	390	0	50.6%

Source: 2012-2016 CHAS

City of Ceres

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	660	675	0	49.4%
White	240	350	0	40.7%
Black / African American	45	20	0	69.2%
Asian	74	35	0	67.9%
American Indian, Alaska Native	-	20	0	0.0%
Pacific Islander	-	-	0	-
Hispanic	290	225	0	56.3%

Source: 2012-2016 CHAS

City of Hughson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	115	115	0	50.0%
White	75	50	0	60.0%
Black / African American	-	40	0	0.0%
Asian	4	-	0	100.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	35	25	0	58.3%

Source: 2012-2016 CHAS

City of Newman

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	150	465	0	24.4%
White	40	205	0	16.3%
Black / African American	15	-	0	100.0%
Asian	-	-	0	-
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	90	265	0	25.4%

Source: 2012-2016 CHAS

City of Oakdale

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	350	320	0	52.2%
White	330	275	0	54.5%
Black / African American	-	-	0	-
Asian	-	-	0	-
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	25	50	0	33.3%

Source: 2012-2016 CHAS

City of Patterson

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	395	305	0	56.4%
White	180	115	0	61.0%
Black / African American	-	-	0	-
Asian	10	-	0	100.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	200	190	0	51.3%

Source: 2012-2016 CHAS

City of Riverbank

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	335	500	0	40.1%
White	125	120	0	51.0%
Black / African American	4	-	0	100.0%
Asian	-	35	0	0.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	210	340	0	38.2%

Source: 2012-2016 CHAS

City of Waterford

Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	65	145	0	31.0%
White	50	75	0	40.0%
Black / African American	-	-	0	-
Asian	-	4	0	0.0%
American Indian, Alaska Native	-	-	0	-
Pacific Islander	-	-	0	-
Hispanic	15	60	0	20.0%

Source: 2012-2016 CHAS

Discussion

Those race or ethnicity groups experiencing a disproportionate rate of housing problems are as follows:

0-30% AMI Range

- Stanislaus County Planning Area
 - Black / African American
 - American Indian, Alaska Native

- Turlock
 - Pacific Islander
- Newman
 - Black / African American
 - Asian
- Oakdale
 - Black / African American
 - Hispanic
- Waterford
 - Black / African American
 - Pacific Islander
 - Hispanic

30-50% AMI Range

- Stanislaus County Planning Area
 - Black / African American
- Turlock
 - Black / African American
 - American Indian, Alaska Native
- Ceres
 - Black / African American
- Oakdale
 - Black / African American
- Patterson
 - Asian
 - American Indian, Alaska Native
 - Pacific Islander
- Waterford
 - Black / African American
 - Hispanic

50-80% AMI Range

- Stanislaus County Planning Area
 - Asian
 - American Indian, Alaska Native
- Turlock
 - Black / African American
 - Asian
 - American Indian, Alaska Native
- Ceres
 - Asian
- Newman
 - Hispanic
- Patterson
 - Black / African American

- Asian
 - American Indian, Alaska Native
 - Pacific Islander
- Riverbank
 - Pacific Islander
- Waterford
 - Asian

80-100% AMI Range

- Stanislaus County Planning Area
 - Asian
- Turlock
 - Asian
- Ceres
 - Black / African American
 - Asian
- Hughson
 - White
 - Asian
- Newman
 - Black / African American
- Patterson
 - Asian
- Riverbank
 - White
 - Black / African American

NA-20 Disproportionately Greater Need: Severe Housing Problems

Introduction

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than 10 percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The tables below indicate the share of households by race/ethnicity and income level experiencing one or more of the four severe housing problems. The four housing problems are:

1. Housing unit lacks complete kitchen facilities;
2. Housing unit lacks complete plumbing facilities;
3. More than one and a half (1.5) persons per room (severely overcrowded); and
4. Household is severely cost burdened (more than 50 percent of income is devoted to housing costs).

Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of households with one or more housing problems from each race/ethnicity and comparing that figure to the share of all households in the given jurisdiction at that income level experiencing the problem. The “Share” column below is equal to the number of households for that race/ethnicity with one or more

housing problem divided by the total number of households for that race/ethnicity (# of households for a given race/ethnicity with a housing problem / total # of households for that race/ethnicity).

0%-30% of Area Median Income

Stanislaus Planning Area

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	6,630	1,570	685	74.6%
White	2,295	995	410	62.0%
Black / African American	320	5	10	95.5%
Asian	195	70	15	69.6%
American Indian, Alaska Native	30	0	0	100.0%
Pacific Islander	50	0	10	83.3%
Hispanic	3,635	455	215	84.4%

Source: 2012-2016 CHAS

City of Turlock

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	2,530	715	140	74.7%
White	1,165	565	40	65.8%
Black / African American	145	25	20	76.3%
Asian	125	0	65	65.8%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	50	0	0	100.0%
Hispanic	975	90	20	89.9%

Source: 2012-2016 CHAS

City of Ceres

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	1,290	195	40	84.6%
White	415	105	19	77.0%
Black / African American	75	10	0	88.2%
Asian	60	30	0	66.7%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	40	0	10	80.0%
Hispanic	695	50	10	92.1%

Source: 2012-2016 CHAS

City of Hughson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	280	15	0	94.9%
White	80	15	0	84.2%
Black / African American	0	0	0	-
Asian	20	0	0	100.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	180	0	0	100.0%

Source: 2012-2016 CHAS

City of Newman

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	225	125	20	60.8%
White	40	50	0	44.4%
Black / African American	10	0	0	100.0%
Asian	20	0	0	100.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	155	70	20	63.3%

Source: 2012-2016 CHAS

City of Oakdale

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	515	275	105	57.5%
White	325	240	85	50.0%
Black / African American	90	0	0	100.0%
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	85	35	0	70.8%

Source: 2012-2016 CHAS

City of Patterson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	680	20	25	93.8%
White	85	0	25	77.3%
Black / African American	10	0	0	100.0%
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	585	20	0	96.7%

Source: 2012-2016 CHAS

City of Riverbank

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	380	140	80	63.3%
White	160	74	10	65.6%
Black / African American	0	0	15	0.0%
Asian	0	20	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	200	40	55	67.8%

Source: 2012-2016 CHAS

City of Waterford

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	250	30	15	84.7%
White	140	0	15	90.3%
Black / African American	10	0	0	100.0%
Asian	0	20	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	10	0	0	100.0%
Hispanic	100	0	0	100.0%

Source: 2012-2016 CHAS

30%-50% of Area Median Income

Stanislaus Planning Area

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	4,665	4,730	0	49.7%
White	1,635	2,000	0	45.0%
Black / African American	106	21	0	83.5%
Asian	155	70	0	68.9%
American Indian, Alaska Native	70	6	0	92.1%
Pacific Islander	35	10	0	77.8%
Hispanic	2,610	2,510	0	51.0%

Source: 2012-2016 CHAS

City of Turlock

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	1,485	1,085	0	57.8%
White	930	735	0	55.9%
Black / African American	4	4	0	50.0%
Asian	50	30	0	62.5%
American Indian, Alaska Native	0	4	0	0.0%
Pacific Islander	0	0	0	-
Hispanic	485	275	0	63.8%

Source: 2012-2016 CHAS

City of Ceres

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	935	875	0	51.7%
White	375	295	0	56.0%
Black / African American	60	0	0	100.0%
Asian	24	49	0	32.9%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	470	505	0	48.2%

Source: 2012-2016 CHAS

City of Hughson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	130	165	0	44.1%
White	75	105	0	41.7%
Black / African American	0	0	0	-
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	55	60	0	47.8%

Source: 2012-2016 CHAS

City of Newman

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	195	120	0	61.9%
White	10	25	0	28.6%
Black / African American	0	0	0	-
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	185	90	0	67.3%

Source: 2012-2016 CHAS

City of Oakdale

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	495	600	0	45.2%
White	315	300	0	51.2%
Black / African American	0	20	0	0.0%
Asian	0	10	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	155	250	0	38.3%

Source: 2012-2016 CHAS

City of Patterson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	235	360	0	39.5%
White	40	160	0	20.0%
Black / African American	0	0	0	-
Asian	15	0	0	100.0%
American Indian, Alaska Native	25	0	0	100.0%
Pacific Islander	10	0	0	100.0%
Hispanic	145	195	0	42.6%

Source: 2012-2016 CHAS

City of Riverbank

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	395	295	0	57.2%
White	135	150	0	47.4%
Black / African American	0	0	0	-
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	255	130	0	66.2%

Source: 2012-2016 CHAS

City of Waterford

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	195	125	0	60.9%
White	55	59	0	48.2%
Black / African American	10	0	0	100.0%
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	130	65	0	66.7%

Source: 2012-2016 CHAS

50%-80% of Area Median Income

Stanislaus Planning Area

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	3,380	9,680	0	25.9%
White	1,435	4,190	0	25.5%
Black / African American	65	70	0	48.1%
Asian	95	230	0	29.2%
American Indian, Alaska Native	35	42	0	45.5%
Pacific Islander	24	16	0	60.0%
Hispanic	1,640	5,040	0	24.6%

Source: 2012-2016 CHAS

City of Turlock

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	980	3,070	0	24.2%
White	425	1,800	0	19.1%
Black / African American	15	35	0	30.0%
Asian	30	120	0	20.0%
American Indian, Alaska Native	20	4	0	83.3%
Pacific Islander	0	0	0	-
Hispanic	470	1,055	0	30.8%

Source: 2012-2016 CHAS

City of Ceres

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	530	2,105	0	20.1%
White	90	690	0	11.5%
Black / African American	0	20	0	0.0%
Asian	80	20	0	80.0%
American Indian, Alaska Native	30	15	0	66.7%
Pacific Islander	0	0	0	-
Hispanic	335	1,330	0	20.1%

Source: 2012-2016 CHAS

City of Hughson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	190	185	0	50.7%
White	115	130	0	46.9%
Black / African American	0	0	0	-
Asian	0	0	0	-
American Indian, Alaska Native	0	10	0	0.0%
Pacific Islander	0	0	0	-
Hispanic	75	50	0	60.0%

Source: 2012-2016 CHAS

City of Newman

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	90	500	0	15.3%
White	40	110	0	26.7%
Black / African American	0	0	0	-
Asian	10	30	0	25.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	25	360	0	6.5%

Source: 2012-2016 CHAS

City of Oakdale

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	335	805	0	29.4%
White	305	410	0	42.7%
Black / African American	0	0	0	-
Asian	0	10	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	10	390	0	2.5%

Source: 2012-2016 CHAS

City of Patterson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	215	640	0	25.1%
White	75	260	0	22.4%
Black / African American	25	0	0	100.0%
Asian	0	80	0	0.0%
American Indian, Alaska Native	10	0	0	100.0%
Pacific Islander	4	0	0	100.0%
Hispanic	105	300	0	25.9%

Source: 2012-2016 CHAS

City of Riverbank

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	210	925	0	18.5%
White	65	325	0	16.7%
Black / African American	0	35	0	0.0%
Asian	0	20	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	20	0	0	100.0%
Hispanic	125	515	0	19.5%

Source: 2012-2016 CHAS

City of Waterford

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	120	335	0	26.4%
White	35	120	0	22.6%
Black / African American	0	0	0	-
Asian	0	30	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	85	185	0	31.5%

Source: 2012-2016 CHAS

80%-100% of Area Median Income

Stanislaus Planning Area

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	1,185	6,490	0	15.4%
White	395	3,450	0	10.3%
Black / African American	15	135	0	10.0%
Asian	59	196	0	23.1%
American Indian, Alaska Native	0	30	0	0.0%
Pacific Islander	0	0	0	-
Hispanic	710	2,575	0	21.6%

Source: 2012-2016 CHAS

City of Turlock

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	420	2,005	0	17.3%
White	260	1,090	0	19.3%
Black / African American	0	125	0	0.0%
Asian	40	84	0	32.3%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	115	675	0	14.6%

Source: 2012-2016 CHAS

City of Ceres

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	235	1,100	0	17.6%
White	40	550	0	6.8%
Black / African American	10	55	0	15.4%
Asian	14	95	0	12.8%
American Indian, Alaska Native	0	20	0	0.0%
Pacific Islander	0	0	0	-
Hispanic	160	355	0	31.1%

Source: 2012-2016 CHAS

City of Hughson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	40	190	0	17.4%
White	40	80	0	33.3%
Black / African American	0	40	0	0.0%
Asian	0	4	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	0	60	0	0.0%

Source: 2012-2016 CHAS

City of Newman

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	100	515	0	16.3%
White	20	230	0	8.0%
Black / African American	0	15	0	0.0%
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	80	275	0	22.5%

Source: 2012-2016 CHAS

City of Oakdale

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	90	585	0	13.3%
White	80	520	0	13.3%
Black / African American	0	0	0	-
Asian	0	0	0	-
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	10	65	0	13.3%

Source: 2012-2016 CHAS

City of Patterson

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	110	590	0	15.7%
White	30	270	0	10.0%
Black / African American	0	0	0	-
Asian	10	0	0	100.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	70	320	0	17.9%

Source: 2012-2016 CHAS

City of Riverbank

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	130	710	0	15.5%
White	30	215	0	12.2%
Black / African American	4	0	0	100.0%
Asian	0	35	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	100	450	0	18.2%

Source: 2012-2016 CHAS

City of Waterford

Severe Housing Problems	One or more housing problems	No housing problems	Household has no/negative income & no housing problems	Share
Jurisdiction as a whole	0	205	0	0.0%
White	0	130	0	0.0%
Black / African American	0	0	0	-
Asian	0	4	0	0.0%
American Indian, Alaska Native	0	0	0	-
Pacific Islander	0	0	0	-
Hispanic	0	75	0	0.0%

Source: 2012-2016 CHAS

Discussion

Those race or ethnicity groups experiencing a disproportionate rate of severe housing problems are as follows:

0-30% AMI Range

- Stanislaus County Planning Area
 - Black / African American
 - American Indian, Alaska Native
- Turlock
 - Pacific Islander
 - Hispanic
- Newman
 - Black / African American
 - Asian
- Oakdale
 - Black / African American
 - Hispanic
- Waterford
 - Black / African American
 - Pacific Islander
 - Hispanic

30-50% AMI Range

- Stanislaus County Planning Area
 - Black / African American
 - Asian
 - American Indian, Alaska Native
 - Pacific Islander
- Ceres
 - Black / African American
- Patterson
 - Asian
 - American Indian, Alaska Native
- Waterford
 - Black / African American

50-80% AMI Range

- Stanislaus County Planning Area
 - Black / African American
 - American Indian, Alaska Native
 - Pacific Islander
- Turlock
 - Black / African American
 - American Indian, Alaska Native
- Ceres
 - Asian
 - American Indian, Alaska Native

- Newman
 - White
- Oakdale
 - White
- Patterson
 - Black / African American
 - American Indian, Alaska Native
 - Pacific Islander
- Riverbank
 - Pacific Islander

80-100% AMI Range

- Turlock
 - Asian
- Ceres
 - Hispanic
- Hughson
 - White
- Patterson
 - Asian
- Riverbank
 - Black / African American

NA-25 Disproportionately Greater Need: Housing Cost Burdens

Introduction

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten (10) percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The tables below indicate the share of households by race/ethnicity and income level experiencing cost burden.

Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of households with one or more housing problems from each race/ethnicity and comparing that figure to the share of all households in the given jurisdiction at that income level experiencing the problem. The “Share” column below is equal to the number of households for that race/ethnicity with one or more housing problem divided by the total number of households for that race/ethnicity (# of households for a given race/ethnicity with a housing problem / total # of households for that race/ethnicity).

Housing Cost Burden

Stanislaus Planning Area

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	46,070	15,090	12,840	705	37.7%
White	25,710	6,565	5,460	435	31.9%
Black / African American	640	170	490	10	50.8%
Asian	1,500	455	460	15	37.9%
American Indian, Alaska Native	130	40	100	0	51.9%
Pacific Islander	185	10	110	10	39.3%
Hispanic	17,050	7,590	5,945	215	44.3%

Source: 2012-2016 CHAS

City of Turlock

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	14,790	4,895	4,590	160	39.1%
White	9,385	2,945	2,600	55	37.1%
Black / African American	300	60	165	20	42.9%
Asian	665	230	240	65	41.4%
American Indian, Alaska Native	50	10	20	-	37.5%
Pacific Islander	-	-	50	-	100.0%
Hispanic	4,085	1,585	1,400	20	42.2%

Source: 2012-2016 CHAS

City of Ceres

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	7,380	3,208	2,309	44	42.8%
White	3,100	1,055	835	24	37.9%
Black / African American	85	70	120	-	69.1%
Asian	385	125	140	-	40.8%
American Indian, Alaska Native	65	4	-	-	5.8%
Pacific Islander	15	-	40	10	72.7%
Hispanic	3,520	1,935	1,155	10	46.7%

Source: 2012-2016 CHAS

City of Hughson

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	1,365	299	675	-	41.6%
White	970	200	320	-	34.9%
Black / African American	60	-	-	-	0.0%
Asian	110	4	20	-	17.9%
American Indian, Alaska Native	10	15	-	-	60.0%
Pacific Islander	-	-	-	-	-
Hispanic	175	65	335	-	69.6%

Source: 2012-2016 CHAS

City of Newman

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	2,075	605	490	20	34.5%
White	935	105	110	-	18.7%
Black / African American	15	15	10	-	62.5%
Asian	80	-	30	-	27.3%
American Indian, Alaska Native	-	-	-	-	-
Pacific Islander	-	-	-	-	-
Hispanic	970	485	330	20	45.7%

Source: 2012-2016 CHAS

City of Oakdale

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	4,360	1,815	1,335	105	41.9%
White	3,495	1,175	995	85	38.3%
Black / African American	-	20	90	-	100.0%
Asian	90	-	-	-	
American Indian, Alaska Native	-	-	-	-	-
Pacific Islander	-	-	-	-	-
Hispanic	715	590	210	-	52.8%

Source: 2012-2016 CHAS

City of Patterson

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	3,254	1,340	1,089	25	42.7%
White	1,040	420	195	25	37.2%
Black / African American	310	25	55	-	20.5%
Asian	120	125	15	-	53.8%
American Indian, Alaska Native	10	-	25	-	71.4%
Pacific Islander	55	-	14	-	20.3%
Hispanic	1,565	770	745	-	49.2%

Source: 2012-2016 CHAS

City of Riverbank

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	4,830	1,209	883	80	30.2%
White	2,210	505	380	10	28.6%
Black / African American	50	20	4	15	32.4%
Asian	260	35	4	-	13.0%
American Indian, Alaska Native	35	-	-	-	
Pacific Islander	-	15	20	-	100.0%
Hispanic	2,185	630	450	55	33.1%

Source: 2012-2016 CHAS

City of Waterford

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Share Cost Burdened
Jurisdiction as a whole	1,504	505	365	40	36.6%
White	900	200	185	40	30.0%
Black / African American	4	-	20	-	83.3%
Asian	40	40	-	-	50.0%
American Indian, Alaska Native	-	-	-	-	-
Pacific Islander	-	-	10	-	100.0%
Hispanic	530	255	150	-	43.3%

Source: 2012-2016 CHAS

Discussion

The following are the race/ethnicity groups that experience cost burden at a disproportionate rate as compared to the jurisdiction as a whole within each jurisdiction:

- Stanislaus County Planning Area
 - Black / African American
 - American Indian, Alaska Native
- Turlock
 - Pacific Islander
- Ceres
 - Black / African American
 - Pacific Islander
- Hughson
 - American Indian, Alaska Native
 - Hispanic
- Newman
 - Black / African American
 - Hispanic
- Oakdale
 - Black / African American
 - Hispanic
- Patterson
 - Asian
 - American Indian, Alaska Native
- Riverbank
 - Pacific Islander
- Waterford
 - Black / African American
 - Asian
 - Pacific Islander

NA-30 Disproportionately Greater Need: Discussion

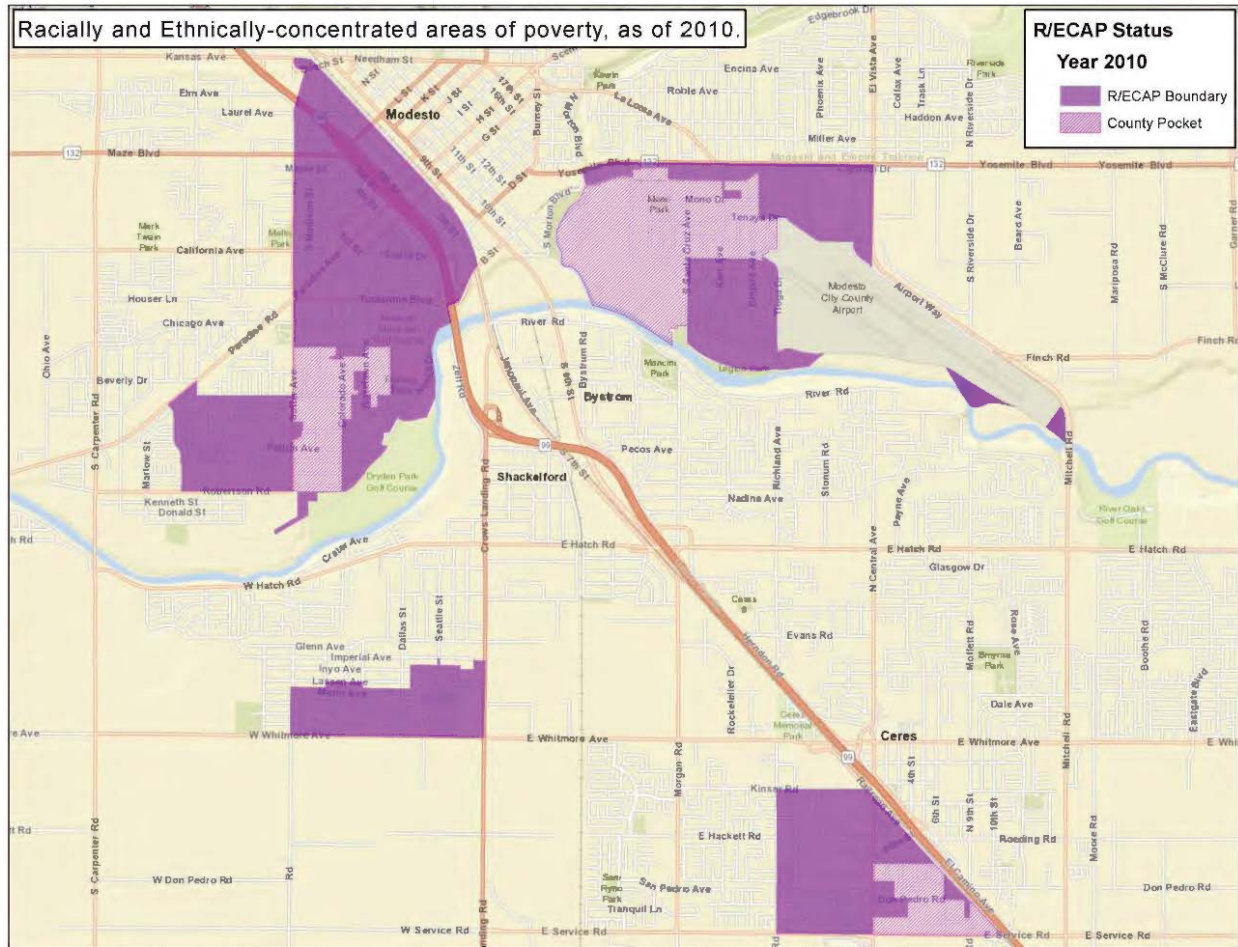
Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The tables in the sections NA-15 through NA-25 above outline those occasions where a racial or ethnic group experience a disproportionate housing need. The “Share” column to the far right of each table outline the racial or ethnic groups housing need while the top row shows the jurisdiction’s total housing need.

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

According to 2010 Census data, there are five (5) Racial/Ethnic Concentrated Areas of Poverty (R/ECAP) within Stanislaus County, one of which is complete within Modesto bounds, while the four remaining are completely in or at least partially within County boundaries near Modesto.

These R/ECAP census tracts are defined as: Census tracts where more than half the population is non-White and 40% or more of the population is in poverty or where the poverty rate is greater than three times the average poverty rate in the area.



NA-35 Public Housing

Introduction

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units/vouchers in use	-	-	-		230	4,170	158	230	0
# of units/vouchers available	-	-	647		242	4,170	231	230	25
# of accessible units	-	-	72		-	-	-	-	-

Characteristics of Residents

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	-	-	87.9%		93.6%	79.1%	78%	92.6%	N/A
Black/African American	-	-	4.5%		5.2%	14%	18.6%	5.4%	N/A
Asian	-	-	7.1%		0.8%	4.9%	0.6%	2.0%	N/A
American Indian, Alaska Native	-	-	0.5%		0.4%	1.4%	0	0	N/A
Pacific Islander	-	-	-		-	-	-	-	N/A
Other	-	-	-		-	0.6%	-	-	N/A

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	-	-	64.8%		40%	27.6%	22.7%	37.4%	N/A
Not Hispanic	-	-	35.3%		60%	72.4%	77.3%	62.6%	N/A

Section 504 Needs Assessment

Describe the needs of public housing tenants and applicants on the waiting list for accessible units.

The Stanislaus Regional Housing Authority has identified the following needs to be the greatest among those tenants and applicants on the waiting list for accessible units:

- Grab bars
- Ramps for front and rear home entry
- Walk in showers
- ADA toilets
- Lower level units
- Service animal permitted

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

The Stanislaus Regional Housing Authority has identified the following needs to be the most immediate needs of residents:

- Community engagement
- Transportation assistance
- Workforce assistance
 - vocational training
 - resume building
 - job search assistance
- Childcare
- Financial literacy

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

The needs outlined above are similar to those needs identified to the population at large, excluding the need for affordable housing. The population at large has also indicated a need for support in increasing wages from employment, childcare, and transportation assistance as well, based on input received at the community meetings.

NA-40 Homeless Needs Assessment

Introduction:

Stanislaus County's Strategic Plan to end homelessness in the County is led by the local Continuum of Care (CoC), known as the Stanislaus Community System of Care (CSOC). As of 2017, the Stanislaus County Housing and Support Services Collaborative (which acted as the Continuum of Care) and the Homelessness Action Council merged efforts in an effort to eliminate duplication of efforts and to coordinate available resources. The CSOC consists of a 25-member Council representing all major sectors of the County including government (City, County), service providers, general public, homelessness advocates, and three reserved spots for individuals with lived experience.

The CSOC meets monthly and continually works to coordinate services and improve relationships and the homelessness service system. The CSOC has been utilizing a Homeless Management Information System (HMIS) since 2012.

In January 2019, the CSOC adopted the *Plan to Address Homelessness in Stanislaus County*, a guiding document to coordinate services and organize around common principles. The plan outlines five (5) core strategies:

1. Outreach and Engagement
 - a. Improve outreach with a focus on engaging those not currently involved with the system of care
2. Coordinated Access
 - a. Fully implement and sustain a countywide coordinated entry system
3. Creation and Access to Housing
 - a. Increase affordable housing options and improve access to temporary, transitional, and permanent supportive housing options
4. Supportive Services
 - a. Increase availability and alignment of services and resources
5. Strengthening the System of Care
 - a. Increase community awareness and participation among county civic and government leaders

Please see the following link to view the entire plan:

<https://csocstan.com/blog/plan-to-end-homelessness-in-stanislaus-county/>

Stanislaus Urban County

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	16	90	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	144	26	0	0	0	0
Chronically Homeless Individuals	29	6	0	0	0	0
Chronically Homeless Families	25	4	0	0	0	0
Veterans	0	2	0	0	0	0
Unaccompanied Child	4	5	0	0	0	0
Persons with HIV	3	0	0	0	0	0
Total	160	116	0	0	0	0

Source: 2019 PIT Count

City of Turlock

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Unsheltered	Sheltered				
Persons in Households with Adult(s) and Child(ren)	5	45	0	0	0	0
Persons in Households with Only Children	1	0	0	0	0	0
Persons in Households with Only Adults	113	82	0	0	0	0
Chronically Homeless Individuals	8	23	0	0	0	0
Chronically Homeless Families	8	19	0	0	0	0
Veterans	4	1	0	0	0	0
Unaccompanied Child	4	2	0	0	0	0
Persons with HIV	1	0	0	0	0	0
Total	119	128	0	0	0	0

Source: 2019 PIT Count

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

Stanislaus Planning Area

Race:	Sheltered	Unsheltered
White	96	128
Black or African American	14	7
Asian	1	0
American Indian, Alaska Native	0	4
Pacific Islander	0	1

Data Source: 2019 PIT Count

Ethnicity:	Sheltered	Unsheltered
Hispanic	64	44
Non-Hispanic	52	83

Data Source: 2019 PIT Count

City of Turlock

Race:	Sheltered	Unsheltered
White	93	97
Black or African American	14	9
Asian	1	1
American Indian, Alaska Native	13	3
Pacific Islander	1	1

Data Source: 2019 PIT Count

Ethnicity:	Sheltered	Unsheltered
Hispanic	64	12
Non-Hispanic	73	103

Data Source: 2019 PIT Count

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

In Stanislaus County according to the 2019 Point in Time (PIT) Count in Stanislaus County there were:

- 106 persons in households with children
 - Of those 106, 16 unsheltered persons
- 29 chronically homeless families
 - Of those 29, 25 unsheltered
- 2 veterans
 - Of those 2, both were sheltered

In Turlock according to the 2019 Point in Time (PIT) Count in Stanislaus County there were:

- 50 persons in households with children
 - Of those 50, 5 unsheltered persons
- 27 chronically homeless families
 - Of those 27, 8 unsheltered
- 5 veterans
 - Of those 5, 4 unsheltered

It is understood, as is indicated in the CSOC's plan to end homelessness, that individuals experiencing homelessness, sheltered or unsheltered, need housing assistance at varying levels of support in order to regain stability.

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

It is important to note that not all individuals counted in the 2019 PIT count identified their race or ethnicity, so the tables below do not all add up to all of those individuals counted in the 2019 PIT Count.

Within the Stanislaus County Planning Area, the following tables show the percentage of those counted in the 2019 PIT Count by race and ethnicity.

Race:	Sheltered	Unsheltered
White	38%	51%
Black or African American	6%	3%
Asian	0%	0%
American Indian, Alaska Native	0%	2%
Pacific Islander	0%	0%

Ethnicity:	Sheltered	Unsheltered
Hispanic	26%	18%
Non-Hispanic	21%	34%

Source: 2019 PIT Count

Within Turlock, the following tables show the percentage of those counted in the 2019 PIT Count by race and ethnicity.

Race:	Sheltered	Unsheltered
White	40%	42%
Black or African American	6%	4%
Asian	0%	0%
American Indian, Alaska Native	6%	1%
Pacific Islander	0%	0%

Ethnicity:	Sheltered	Unsheltered
Hispanic	25%	5%
Non-Hispanic	29%	41%

Data Source: 2019 PIT Count

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

In Stanislaus County Planning Area and Turlock, approximately half of those individuals experiencing homelessness during the 2019 PIT Count were counted as unsheltered. Specifically, in Stanislaus County 58% of those counted in the 2019 PIT were counted as unsheltered, while 48% of those counted in Turlock were unsheltered. In looking at who those unsheltered individuals are, in both the Stanislaus County Planning Area and Turlock, persons in households with only adults make up the vast majority of those unsheltered individuals. Of those unsheltered in Stanislaus County Planning Area, 90% were persons in households with adults only, while in Turlock 95% of unsheltered individuals are persons in households with only adults.

In 2019 there was a temporary outdoor emergency shelter established to address the growing need; the Modesto Outdoor Emergency Shelter (MOES). This shelter closed at the end of 2019. To protect the individuals that will no longer be able to stay at the MOES, 180 new shelter beds were located at the Salvation Army Berberian Center in Modesto. This is being funded through private donations, the City of Modesto, Stanislaus County Foundation investments, and HEAP funds.

NA-45 Non-Homeless Special Needs Assessment

Introduction

There are a variety of subpopulations of households that are not homeless but still may require specialized supports to maintain an independent living situation. The subpopulations covered in this section will be: persons with disabilities, elderly, youth, persons with HIV/AIDS, victims of domestic violence, and farmworkers. The facilities and services available to these subpopulations are discussed in greater detail in the Market Analysis (MA-35) section of this Consolidated Plan.

Describe the characteristics of special needs populations in your community.

Persons with Disabilities

The tables below outlines the number of individuals with the associated disability type.

Stanislaus Planning Area

Disability Type	# of persons	% of Total Population
Hearing Difficulty	8,576	3.4%
Vision Difficulty	6,421	2.6%
Cognitive Difficulty	11,967	4.8%

Ambulatory Difficulty	14,934	6.0%
Self-Care Difficulty	5,744	2.3%
Independent Living Difficulty	10,713	4.3%

Source: 2017 ACS

City of Turlock

Disability Type	# of persons	% of Total Population
Hearing Difficulty	2,924	4.1%
Vision Difficulty	1,875	2.6%
Cognitive Difficulty	3,415	4.8%
Ambulatory Difficulty	4,878	6.9%
Self-Care Difficulty	2,126	3.0%
Independent Living Difficulty	3,431	4.8%

Source: 2017 ACS

Of disability categories outlined in the above table, those individuals aged 65 and above make up the majority of those experiencing hearing and ambulatory difficulty. Vision difficulty is experienced more commonly among all age ranges, skewing slightly higher among older populations. Cognitive difficulty is greatest among those ages 65 and older, but still occurs at approximately a 4% prevalence rate among those under the age of 65. The percentages above are similar to both the national and state numbers in the same categories.

Elderly

According to the 2017 American Community Survey (ACS), about 11% of the population in the Stanislaus Planning Area are over the age of 65, while approximately 14% of Turlock's population is over the age of 65. When considering special needs for the elderly, several key elements are at play:

- This age group is more likely to be on a fixed income, with fewer opportunities to increase income
- The elderly population is often more susceptible to injury and illness
- Those over the age of 65 are more likely to need services associated with a disability, particularly a physical disability that then limits the types of housing available

Retirement homes do offer an alternative type of housing that may deliver on the needed services, however these homes are not affordable to many, and many elderly individuals prefer to "age in place." A complicating factor to those elderly individuals that desire to age in place is their ability to upkeep their

home to a condition that is both suitable in general and then suitable for any special need they may have. Home repair programs, social programming, and transportation are critical to this demographic.

Youth

Stanislaus County students perform slightly under the California average in reading proficiency in grades 3-11. However, about 9.5% of students attending high school do not complete high school, this is below the state average of 10.7%. Special education enrollment and student to educator ratios in Stanislaus County are comparable to the State (kidsdata.org).

A concern noted in a community meeting was the lack of childcare facilities and supports that exist in the region. This is an issue shared in many jurisdictions, however the data points to a more notable issue in Stanislaus County. According to kidsdata.org, 84% of children with working parents would not have a spot in a childcare facility even if their parents desired one. The lack of childcare options for working family's hampers working families that may be earning 50-80% of AMI abilities to seek further economic or educational opportunities.

Victims of Domestic Violence

Domestic violence is any physical violence which occurs in the following relationships:

- Married couples
- Cohabiting couples
- People who have a child or children in common
- People in a dating relationship or who were in a former dating relationship
- People who were formerly married

Violence in these circumstances leave the victim particularly vulnerable because often resources are held back by the perpetrator, or there are demands made that may put the victim in a further vulnerable position. Stanislaus County Victim Services Division has several services directed specifically towards victims of domestic violence.

The primary need for these victims is safe and accessible shelter they are comfortable going to. This means that not only does the shelter need to have availability, but it needs to have services customized to the victim and any children that may be accompanying the victim. For a full list of shelters and available services within the County please see: <http://www.stanislaus-da.org/domestic-violence.shtm>.

Farmworkers

Farmworker housing refers to housing accommodations provided for farmworkers, day laborers, and other agricultural employees covered by state law. Under California's Employee Housing Act, jurisdictions must consider housing for six or fewer employees as a residential use and allow this type of housing anywhere single-family units are permitted (California Health and Safety Code Division 13, Part 1, Section 17000).

For farmworker housing as a specific subset of employee housing, the Act considers housing with 36 beds or 12 units as an agricultural use and to be permitted in zones where other agricultural uses are permitted.

Across Stanislaus County, most jurisdictions comply with state law by allowing farmworker housing in areas zoned for agricultural use. Two jurisdictions, Hughson and Modesto, do not explicitly reference farmworker housing in their zoning ordinances but each accommodates this type of housing. Modesto elaborates on its policy in the city's 2015-2023 Housing Element which explains that farmworker housing "may be developed in any zone where residential uses are permitted."¹ Likewise, in its 2019-2023 Housing Element, Hughson explains that farmworker housing can be developed by right in areas zoned for multifamily use and that the city's zoning ordinance currently needs to be updated to fully comply with state law by permitting farmworker housing in all areas where single-family units are allowed. The city also points out, however, that agricultural uses are not permitted anywhere within city limits, and therefore, the zoning ordinance does not need to permit housing with 36 beds or 12 units as an agricultural use because this state regulation does not apply.²

Ceres, Waterford, and Riverbank all additionally permit farmworker housing by right, and Patterson with a conditional use permit, in at least some residential zones.

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

For elderly populations, which are more likely to need physical accommodations such as ramps, grab bars, and other accessibility features are most often needed. In the 2016 Stanislaus County Aging and Veteran Services survey, the need for affordable and appropriate housing was expressed in a number of brainstorming sessions. Specifically, the need for assisted living for people who are low income. Also for the elderly population, in-home services was brought up for those that did not necessarily need skilled nursing, but would benefit from in-home services to maintain the level of independence they are comfortable with.

Persons with disabilities have needs for housing that is both affordable and appropriate for the renter/owner. That is housing that meets their unique needs; whether that be walking distance to public transit, health care services, etc. or housing that accommodates physical needs such as ramps, grab bars, etc.

For farmworkers, the peak season is July through September, and their demand on housing creates need for small, affordable units. Often their work is low-wage temporary work, so they are not necessarily interested in purchasing a home, rather they are seeking affordable smaller units so they can earn money through employment.

With all of the special needs populations, needs are mostly determined by local agencies, government and non-government alike. Some examples of these agencies are Disability Resource Agency for Independent Living (DRAIL), the County Area Agency on Aging, The County Aging and Veteran Services Agency, Catholic Charities, Society of Disabilities, STANCO, County Behavioral Health, among others.

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

¹ Page 3-11, <https://www.modestogov.com/DocumentCenter/View/7025/Chapter-3-Constraints-PDF>.

² Page 56, http://hughson.org/wp-content/uploads/2019/03/HughHE_Adopted_2015-12-21.pdf.

California recently became the first state in the nation to allow pharmacies to dispense HIV prevention drugs without a doctor's prescription through passage of S.B 159. This law will allow California residents to obtain both the pre-exposure and post-exposure prescriptions at a pharmacist's discretion. Stanislaus County has seen an uptick in the number of residents living with HIV; going from 560 active cases in 2013 to 776 cases in 2017 (California HIV Surveillance Report – 2017).

These individuals living with HIV/AIDS are in need of quality public transit that offer reasonable access to public health and medical care.

NA-50 Non-Housing Community Development Needs

Describe the jurisdiction's need for Public Facilities.

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

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

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

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

How were these needs determined?

A survey was conducted as part of the consolidated plan process as well as direct communication with County and City staff. When asked about what parks and community center services were most important to fund, respondents identified the top three priorities as facilities serving youth/after-school programs, facilities serving seniors, and improvements to accessibility for seniors and disabled persons.

Describe the jurisdiction's need for Public Improvements:

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

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

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

Streetlights: Many streets lack adequate street lighting.

How were these needs determined?

A survey was conducted as part of the consolidated plan process as well as direct communication with County and City staff. Results of the survey identified street improvements, improving water supply, and installing or improving street lighting to be the highest priority among infrastructure improvements surveyed.

Describe the jurisdiction's need for Public Services.

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

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

How were these needs determined?

A survey was conducted as part of the consolidated plan process and consultation with the CoC, the SHA, and each city and unincorporated communities within the Stanislaus County Planning Area.

Housing Market Analysis

7MA-05 Overview

Housing Market Analysis Overview

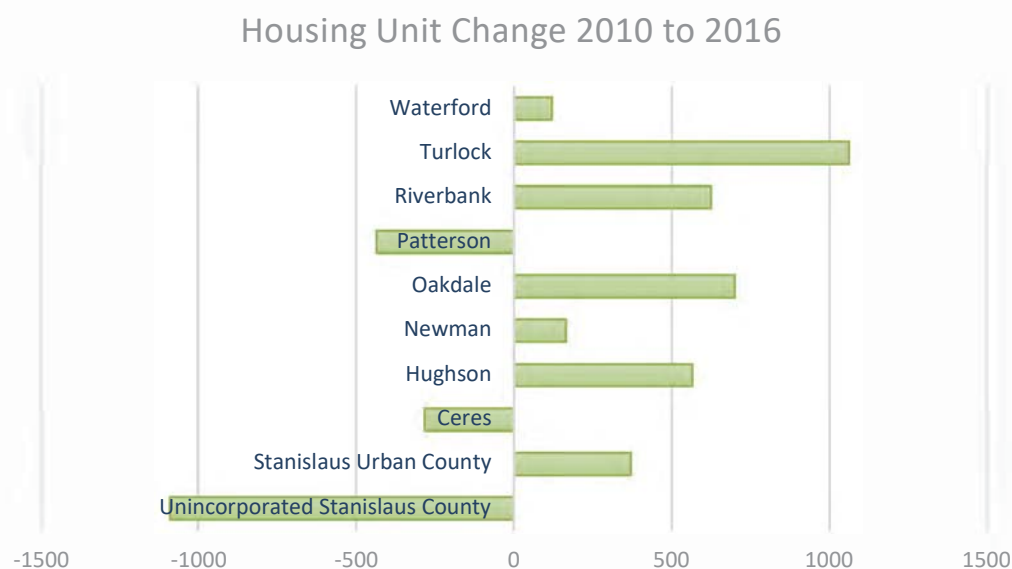
Ten years ago, Stanislaus County was one of the U.S. communities hit hardest by the economic crisis, losing around 9% of all homeowner housing units to foreclosure. Since that time, like in most places in the country, the housing market has slowly recovered, especially boosted locally by Stanislaus County's highway connection to the San Francisco Bay Area located to the west/ northwest. The Bay Area has a strong economy and a large number of high-paying jobs but also a housing market that is extraordinarily expensive for both homeowners and renters. Stanislaus County, by comparison, has inexpensive housing and small cities and towns that are an appealing contrast to what can be limited housing options for many in the Bay Area. Modesto, Turlock, and the entire Stanislaus Urban County area are projected to grow in the next 20 years and will require housing units at all incomes and structure types to strengthen the local economy and create desirable, livable neighborhoods.

MA-10 Housing Market Analysis: Number of Housing Units

Introduction

There are an estimated 180,386 housing units within Stanislaus County. 79,250 are within the Stanislaus Urban County and 25,759 are within the City of Turlock. Both areas are growing. The City of Turlock added more than 1,000 housing units between the American Community Survey's estimation periods of 2006-2010 and 2012-2016. Housing units also increased in Waterford, Riverbank, Oakdale, Newman, and Hughson.

While population increased within all incorporated areas within the Stanislaus Planning Area, not all areas saw housing units increase during the same period. This may be at least partially due to an increase in housing overcrowding or a change in household structures in the area. Patterson and Ceres both lost housing units while population increased. The unincorporated areas of the Urban County had both a decrease in population and housing units during this time period.



Source: 2012-2016 ACS

The majority of housing units within both the Stanislaus Urban County and City of Turlock are one-unit detached housing, with a larger percentage of multifamily buildings of all sizes within Turlock.

All Residential Properties by Number of Units

UNITS IN STRUCTURE	Stanislaus Urban County	Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Unincorporated County
1-unit, detached	82.26%	78.90%	86.20%	85.00%	71.50%	90.10%	86.40%	69.50%	86.80%	82.95%
1-unit, attached	3.42%	3.90%	0.00%	1.30%	6.90%	4.30%	1.70%	4.40%	1.50%	3.25%
2 units	1.83%	2.00%	0.60%	2.30%	5.30%	0.60%	2.80%	2.40%	2.70%	0.94%
3 or 4 units	1.87%	2.30%	0.00%	5.60%	4.60%	0.80%	1.30%	5.20%	5.40%	0.90%
5 to 9 units	1.18%	2.90%	0.00%	1.30%	1.60%	0.00%	1.70%	5.10%	2.00%	0.56%
10 to 19 units	0.72%	2.10%	1.40%	0.00%	1.40%	0.30%	0.40%	2.10%	0.00%	0.25%
20 or more units	2.05%	4.30%	7.40%	2.90%	5.10%	1.40%	1.50%	7.90%	0.50%	0.37%
Mobile home	6.41%	3.20%	4.50%	1.60%	3.60%	2.50%	4.20%	3.10%	1.10%	10.35%
Boat, RV, van, etc.	0.27%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.43%

Source: 2012-2016 ACS

Unit Size by Tenure (Stanislaus County)

	Owners		Renters	
	Number	%	Number	%
No bedroom	505	1%	2639	4%
1 bedroom	997	1%	10930	15%
2 bedrooms	11,122	12%	26984	36%
3 or more bedrooms	83,724	87%	33427	45%

Source: 2012-2016 ACS

Unit Size by Tenure (City of Turlock)

	Owners		Renters	
	Number	%	Number	%
No bedroom	33	0%	533	5%
1 bedroom	135	1%	1982	17%
2 bedrooms	1420	11%	4478	38%
3 or more bedrooms	11144	88%	4697	40%

Source: 2012-2016 ACS

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

Stanislaus Urban County and City of Turlock anticipate the following housing activities from 2020-2024:

CDBG Funds: The Stanislaus Urban County does not use CDBG funds for housing activities.

The City of Turlock uses CDBG funds for down payment assistance and housing rehabilitation.

HOME Funds: City of Turlock and Stanislaus Urban County are entitlement communities for HOME Funds. These funds are used for low-income households.

Other Funding Sources: The Stanislaus Urban County will pursue additional funding to address housing needs in the unincorporated areas and may collaborate with the City of Turlock in funding applications. Potential funding sources include bonds, the State Energy Upgrade California Program, and the existing PG&E Rebate Program, all serving low-income households.

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

There is no anticipated loss of housing units or expiration of Section 8 contracts from the affordable housing inventory within the next five years. Funding contracts for Ceres Christian Terrace in Ceres (67 units) and Denair Manor Apartments in Turlock (70 units), both funded through HUD project-based Section 8, are scheduled to expire before the year 2030.

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

The Housing Authority currently has waiting lists for publicly assisted housing and Housing Choice Vouchers have a wait period of many years. In addition to issues relating to affordability, issues relating to housing conditions are also prevalent. With more than half (60 percent) of the housing units older than 30 years of age, a large portion of Stanislaus County's housing stock may need substantial rehabilitation. The extent of housing needs far exceeds the resources available to address those needs.

Describe the need for specific types of housing.

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

MA-15 Housing Market Analysis: Cost of Housing

Introduction

Stanislaus County remains an affordable housing market compared to regional cities like San Jose, Oakland, and Sacramento. Using the California Association of Realtors' Traditional Housing Affordability

Index (HAI), 47 percent of households within Stanislaus County can afford to purchase a median priced home in the County. In the San Francisco Bay Area, only 23 percent of households can do the same.

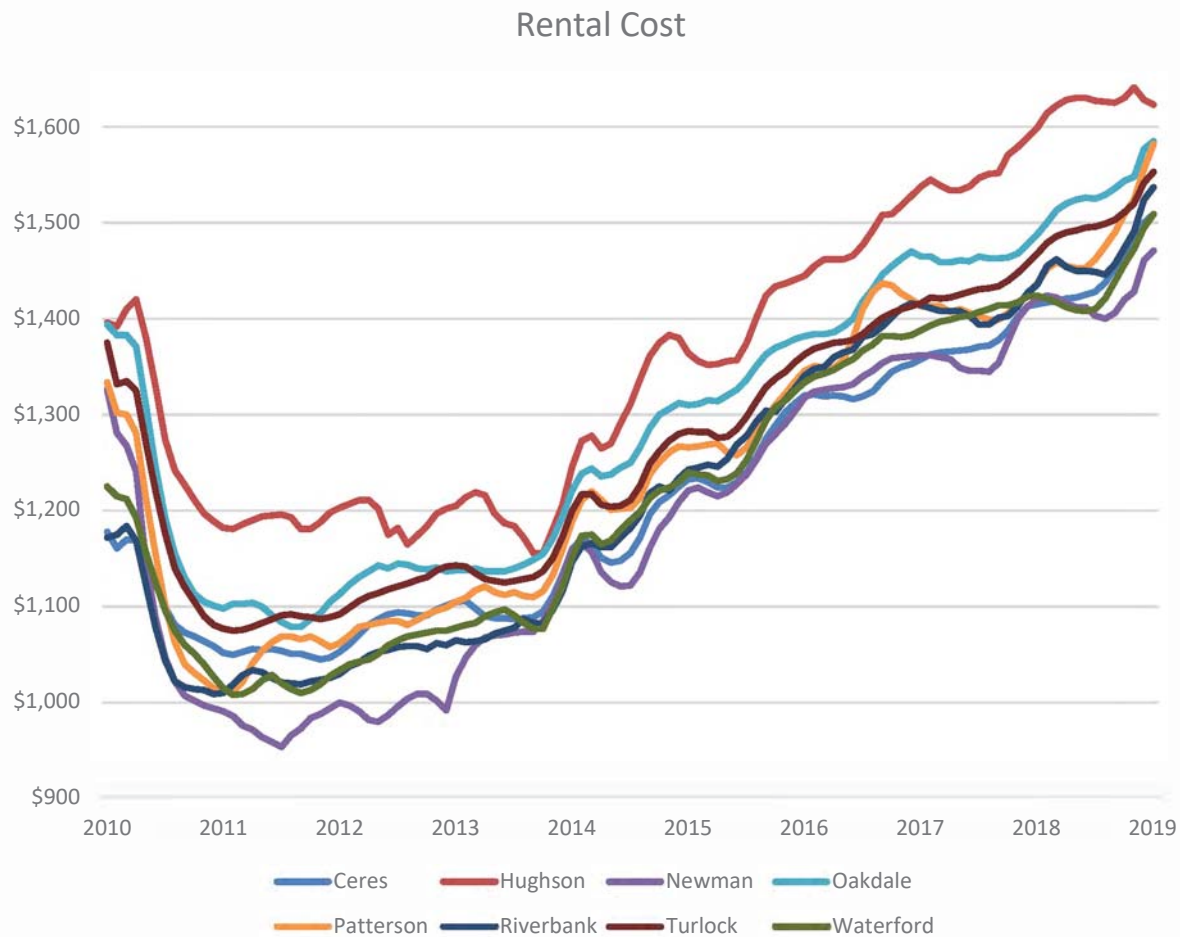
Because the more-expensive surrounding regions are experiencing a housing crisis, this begins an increase in housing demand, and housing prices, around areas like San Joaquin and Stanislaus Counties.

California Association of Realtors Traditional Housing Affordability Index 2018-2019				
Area	2018-2019	Median Home Price	Monthly Payment Including Taxes & Insurance	Minimum Qualifying Income
US	55	\$279,600	\$1,410	\$56,480
S.F. Bay Area	23	\$980,000	\$4,950	\$197,970
Merced County	45	\$282,000	\$1,420	\$56,970
San Joaquin County	42	\$380,000	\$1,920	\$76,760
Stanislaus County	47	\$325,250	\$1,640	\$65,700

Cost of Housing

Rental Housing

Rents in all cities have increased steadily since 2014. Hughson, Oakdale, and Patterson have the highest rents, with Hughson's rents recently topping \$1,600 per month. Newman and Waterford have the lowest rents. The highest number of naturally affordable (lower cost) rental units, however, are in Turlock, the unincorporated areas of the County, and Ceres.



Source: Zillow

Gross Monthly Rent by Percent of Occupied Rental Units

Gross Monthly Rent	Stanislaus Urban County	Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Unincorporated County
Less than \$500	6.43%	5.10%	3.90%	11.60%	8.90%	6.30%	6.90%	6.80%	2.30%	6.20%
\$500 to \$999	44.33%	40.70%	40.20%	36.00%	48.00%	26.00%	39.30%	47.70%	60.00%	49.39%
\$1,000 to \$1,499	35.28%	42.60%	21.20%	41.20%	32.90%	30.80%	41.80%	31.70%	32.50%	32.88%
\$1,500 to \$1,999	11.01%	10.70%	19.00%	9.30%	8.70%	33.50%	10.30%	10.90%	4.50%	7.71%
\$2,000 to \$2,499	1.87%	0.70%	1.90%	1.80%	1.40%	3.40%	1.30%	2.40%	0.00%	2.44%
\$2,500 to \$2,999	0.41%	0.00%	3.70%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.69%
\$3,000 or more	0.68%	0.20%	10.10%	0.00%	0.00%	0.00%	0.40%	0.40%	0.80%	0.69%

Source: 2012-2016 ACS

Gross Monthly Rent by Number of Occupied Rental Units

Gross Monthly Rent Paid	Stanislaus Urban County	Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Unincorporated County
Less than \$500	1,729	254	31	138	277	138	155	772	18	718
\$500 to \$999	11,926	2,036	318	430	1,496	568	879	5,386	480	5,719
\$1,000 to \$1,499	9,492	2,131	168	492	1,025	673	936	3,582	260	3,807
\$1,500 to \$1,999	2,962	537	150	111	272	733	230	1,234	36	893
\$2,000 to \$2,499	503	35	15	22	45	74	30	269	0	282
\$2,500 to \$2,999	110	1	29	0	0	0	0	6	0	80
\$3,000 or more	182	8	80	0	0	0	8	43	6	80

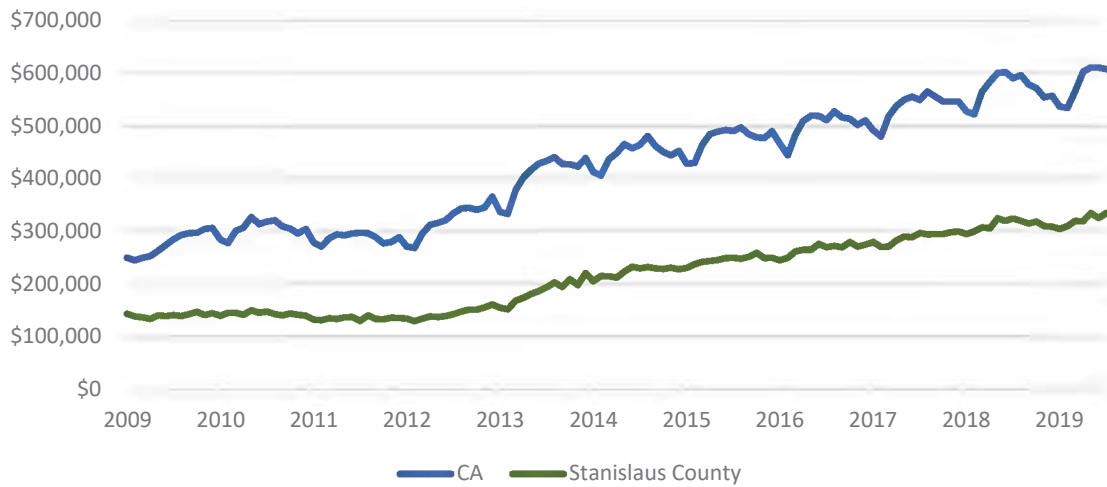
Source: 2012-2016 ACS

Homeowner Housing

Homeowner housing unit values have steadily increased since 2014, though the County's average housing value is still well below the California average. Within Turlock, the housing research arm of Zillow calculates that home values have gone up 3.3 percent over 2018-2019 and predicts they will rise 1.4 percent in 2020.

Areas with lower housing values are seeing more dramatic price increases. Newman currently has a low median value of \$295,500 but values have gone up 4.4 percent over 2018-2019 the past year and Zillow predicts they will rise 2.3 percent within 2020. Ceres currently has a median housing value of \$303,200, up 4.8 percent over 2018-2019 and predicted to rise 2.2 percent in 2020.

Median Price Existing Single-Family Detached Homes



Source: Source: California Association of Realtors

Value of Owner-Occupied Homes

Value: Owner-Occupied Homes	Stanislaus Urban County	Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Unincorporated County
Less than \$50,000	6.70%	6.10%	1.40%	1.90%	6.00%	4.90%	3.10%	6.90%	2.80%	9.40%
\$50,000 to \$99,999	7.53%	6.60%	7.40%	16.00%	4.50%	6.40%	2.80%	3.10%	16.60%	8.32%
\$100,000 to \$149,999	13.89%	19.10%	5.30%	24.30%	9.80%	13.30%	15.30%	9.80%	22.70%	11.56%
\$150,000 to \$199,999	17.35%	25.10%	17.50%	32.00%	13.40%	21.60%	21.00%	17.80%	19.10%	12.12%
\$200,000 to \$299,999	25.91%	30.00%	37.60%	21.00%	34.30%	32.30%	36.20%	29.90%	27.10%	18.50%
\$300,000 to \$499,999	18.84%	11.80%	28.20%	4.70%	30.60%	20.20%	19.70%	28.50%	9.90%	19.90%
\$500,000 to \$999,999	7.55%	0.60%	2.60%	0.00%	1.00%	1.30%	1.20%	3.30%	1.80%	15.72%
\$1,000,000 or more	2.22%	0.60%	0.00%	0.00%	0.40%	0.00%	0.90%	0.60%	0.00%	4.49%

Source: 2012-2016 ACS

Modesto, California MSA 2019 HOME Rent Limits (Effective June 28, 2019)

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$722	\$803	\$1,016	\$1,451	\$1,715
High HOME Rent	\$722	\$791	\$952	\$1,091	\$1,198
Low HOME Rent	\$567	\$608	\$730	\$842	\$940

Is there sufficient housing for households at all income levels?

Since 2017, rental and homeowner housing prices within Stanislaus County have increased significantly as housing stock has not kept pace with demand. This has made it difficult for local young workers to afford housing. (Stanislaus County Comprehensive Economic Development Strategy 2019-2024)

Within Turlock, the City of Turlock's 2017 Economic Development Strategic Plan notes that the pace of housing development does not meet the need for workforce or executive housing and that the existing City limits now constrain housing. A lowered supply of housing for low- and middle-income housing will create rising housing costs both for rental and homeowner housing. The Plan also notes that community members have expressed concern that low-income groups, particularly seniors and veterans, have a difficult time finding affordable housing. (City of Turlock Economic Development Strategic Plan June 20, 2017)

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

Housing affordability will most likely decrease for both renters and owners in the next five years. Affordability will be a problem for both low- and middle-income residents because of increased demand (partly a result of the regional housing price surge in the Bay Area). Since the economic crisis of 2008, tighter lending standards have made home purchase difficult for low-income residents. Increased prices for homebuyer units have also priced many low-income residents out of the homebuyer market; this will continue to be an issue within all cities in the County.

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

HOME rents are below fair market rents, with the difference in cost increasing with the number of bedrooms in the housing unit. Affordable three- and four-bedroom units then have the greatest need for production or preservation as more smaller housing units (efficiency, one, and two-bedroom units) are naturally produced in the free market. As housing costs increase, affordable housing production and preservation will become more important as naturally occurring affordable units decrease in number.

MA-20 Housing Market Analysis: Condition of Housing

Introduction

About 46 percent of housing units in Stanislaus Urban County and 43 percent of housing units in the City of Turlock were built before 1980.

Older units are generally in greater need of repair, including possible lead-based paint remediation.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation".

"Substandard housing" conditions in the Stanislaus Planning Area include the following:

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

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

Using the Stanislaus County's 2019 ESG/PSG Guide definition, a housing unit is considered to be in "Standard Condition" if the unit:

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

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

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

Condition of Units (Stanislaus County)

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	29,931	31%	37,368	51%
With two selected Conditions	944	1%	4,794	6%
With three selected Conditions	9	0%	193	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	65,464	68%	31,625	43%
Total	96,348		73,980	

Source: 2012-2016 ACS

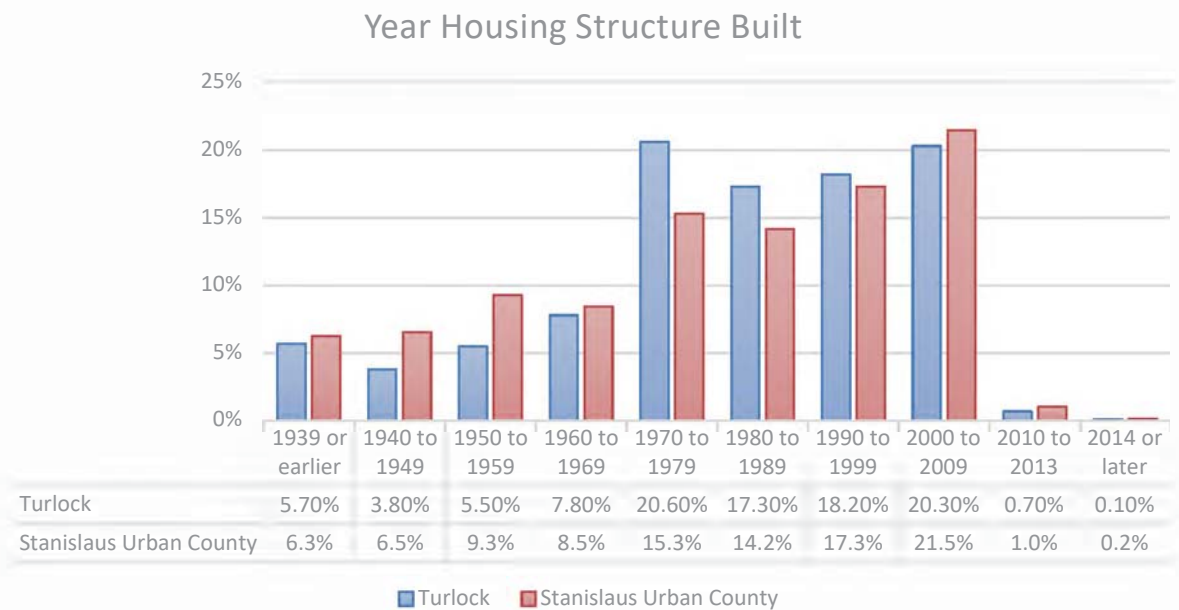
Condition of Units (Turlock)

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,856	30%	5,732	49%
With two selected Conditions	161	1%	647	6%
With three selected Conditions	9	0%	117	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	8,706	68%	5,194	44%
Total	12,732		11,690	

Source: 2012-2016 ACS

Year Unit Built

Stanislaus Urban County has a wide range of housing ages, with more housing units built before 1970 and more housing units built after the year 2000 than the City of Turlock. Turlock appears to have had a housing construction boom between 1970 and 2009 (around the time of the housing crisis) when housing production dropped sharply. The smaller cities in Stanislaus County (Hughson, Patterson, and Riverbank) have an especially large proportion of their total housing stock constructed between 2000 and 2009.



Source: 2012-2016 ACS

Year Unit Built

Year Structure Built	Stanislaus Urban County	Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford	Unincorporated County
Built 2014 or later	0.18%	0.10%	0.40%	0.00%	0.00%	0.00%	0.70%	0.10%	0.30%	0.14%
Built 2010 to 2013	1.05%	0.40%	3.40%	1.90%	1.40%	1.70%	1.90%	0.70%	0.00%	0.75%
Built 2000 to 2009	21.45%	22.60%	37.50%	23.70%	21.60%	49.40%	31.60%	20.30%	27.80%	12.38%
Built 1990 to 1999	17.30%	15.70%	12.60%	33.50%	22.40%	11.00%	25.80%	18.20%	24.10%	14.38%
Built 1980 to 1989	14.18%	22.40%	8.50%	12.90%	12.60%	18.10%	11.00%	17.30%	20.30%	11.52%
Built 1970 to 1979	15.29%	19.10%	15.10%	6.40%	12.20%	6.70%	12.80%	20.60%	10.10%	17.71%
Built 1960 to 1969	8.45%	6.00%	3.50%	5.90%	8.20%	5.10%	5.00%	7.80%	5.50%	11.53%
Built 1950 to 1959	9.28%	8.90%	5.90%	7.90%	8.90%	3.60%	3.80%	5.50%	3.40%	12.39%
Built 1940 to 1949	6.54%	3.20%	8.00%	2.20%	7.90%	2.00%	3.90%	3.80%	3.50%	9.33%
Built 1939 or earlier	6.28%	1.60%	5.00%	5.60%	4.80%	2.40%	3.50%	5.70%	5.00%	9.88%

Source: 2012-2016 ACS

Risk of Lead-Based Paint Hazard (Stanislaus County)

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980.	43,663	45%	41,575	56%
Housing units built before 1980 with children present	8,270	9%	10,160	14%

Source: 2012-2016 ACS

Risk of Lead-Based Paint Hazard (City of Turlock)

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980.	4,838	38%	5,706	49%
Housing units built before 1980 with children present	2,899	23%	2,245	19%

Source: 2012-2016 ACS

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

Housing age can indicate general housing conditions within a community. Housing is subject to gradual deterioration over time. Deteriorating housing can depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Those low- and moderate-income areas within Urban County cities, unincorporated areas, as well as Turlock are often more likely to have lower quality housing. This may be due to owners not having resources to afford needed rehabilitation or due to landlords not investing in those properties that are within low- and moderate-income neighborhoods and communities.

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

Lead-based paint and varnishes were used in houses until 1978 and are still assumed to be present in the home unless the house has been fully remediated by a certified contractor. Children under age six are at the highest risk for physical and mental damage from lead poisoning.

The number of housing units that could potentially have lead-based-paint hazards within the Stanislaus Planning Area is equal to the number of housing units built before 1978 (1980 data used as a proxy for 1978). 36,328 housing units within the Stanislaus Urban County and 11,182 within the City of Turlock were built before 1980 and could have lead-based paint hazards, particularly if the housing unit is in poor condition.

Lead poisoning prevention and treatment within Stanislaus County is managed by The Stanislaus County Childhood Lead Poisoning Prevention Program (CLPPP) within the County's Department of Health Services.

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

MA-25 Public and Assisted Housing

Introduction:

Public and Assisted Housing is managed by the Stanislaus Regional Housing Authority.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project - based	Tenant - based	Vouchers		
							Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units/vouchers in use	-	-	-		230	4,170	158	230	-
# of units/vouchers available	-	-	647		242	4,170	231	230	25
# of accessible units	-	-	72		-	-	-	-	-

Describe the supply of public housing developments:

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

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

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

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

Public Housing Condition

Public Housing Development	Average Inspection Score
Hughson Scattered Sites	89
Westley Area	94
Scheela Apartments - Riverbank	92

Source: HUD Physical Inspection Scores, <https://www.huduser.gov/portal/datasets/pis.html>.

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

Restoration and revitalization needs are typically identified through physical needs assessments completed for the public housing properties. These activities are then incorporated in the Housing Authority's Five-Year Action Plan.

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

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

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

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

Discussion:

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

Currently, there is no other funding or authorization from HUD to increase the number of public housing units; however, the Housing Authority is always working to increase the stock of affordable housing in Stanislaus County through other available resources, programs, and partnerships as opportunities arise. The current need for public housing is identified by the number of persons on the program waitlists. Specific to public housing, the Housing Authority maintains nine site-based waiting lists countywide. Seven of these waiting lists are for units located in AMPs 1 and 2.

The Stanislaus Regional Housing Authority has adopted a strategic plan which includes obtaining development and consulting services to evaluate future options including conversion of Public Housing units under HUD's Rental Assistance Demonstration program, Operating Fund Financing Program with possible demolition and/or disposition of Public Housing units, and mixed use development in conjunction with its non-profit affiliate, Great Valley Housing Development Corporation.

MA-30 Homeless Facilities and Services

Introduction

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	221		42	329	
Households with Only Adults	357	133	172	379	
Chronically Homeless Households	N/A		N/A	576	
Veterans	0		16	266	
Unaccompanied Youth	22		0	0	

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

Some of the service providers, mental health, and employment services that can be accessed by homeless persons within the Stanislaus Urban County include:

AspiraNet

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

Behavioral Health and Recovery Services (Inpatient, PSH Supportive Service, Street Outreach, Telecare, ACCESS Team)

Behavioral Health and Recovery Services (BHRS) administers Stanislaus County's behavioral health and recovery services. This includes providing integrated mental health services to adults with a serious mental illness and to children and youth with a serious emotional disturbance. BHRS provides outpatient and residential alcohol and drug treatment and prevention services. The Housing and Employment Services division of BHRS works to provide supportive housing to those in need. BHRS provides training courses to the general public to engage the community in assisting those who need treatment for a mental health illness in obtaining services.

California Conservation Corps

The California Conservation Corps provides young men and women between the ages of 18 and 25 the opportunity to work for a year outdoors to improve California's natural resources and to assist with emergency response.

Central Valley Opportunity Center (CVOC)

Central Valley Opportunity Center (CVOC) is a nonprofit employment training and service provider serving the counties of Stanislaus, Merced, and Madera. CVOC services include vocational education, remedial education, English language instruction, housing assistance, energy payment assistance, emergency supportive services, transportation, emergency food, youth employment, health care acquisition, child care services, and community education services. CVOC has effectively provided a comprehensive package of services to over 100,000 customers.

Disability Resource Agency for Independent Living (DRAIL)

The Disability Resource Agency for Independent Living (DRAIL) is a nonprofit corporation that provides persons with disabilities assistance obtaining Social Security benefits, acquiring adaptive medical aids, and gaining necessary accommodations to participate in vocational training. DRAIL has offices located in Modesto, Stockton, and Sonora.

Employment Development Department (EDD)

The Employment Development Department (EDD) is a State agency that provides services to Californians under Unemployment Insurance, State Disability Insurance, workforce investment, and Labor Market Information programs. Particularly relevant services include helping job seekers obtain employment, administering workforce investment programs, and assisting disadvantaged recipients in becoming self-sufficient.

Golden Valley Health Center (Corner of Hope Homeless Outreach Program)

The Golden Valley Health Center's mission is to improve the health status of patients by providing quality, managed primary health care services to people in Stanislaus County, regardless of language, and financial, or cultural barriers. Free health services, including dental, vision, general medical and mental health services, are available for the homeless. There are currently thirteen medical facilities located in

Stanislaus County. There are six facilities in Modesto, two in the City of Turlock, and one each in Ceres, Newman, Patterson, Riverbank, and Westley.

Health Services Agency (HSA)

The mission of the Stanislaus County HSA is to lead the development, implementation, and promotion of public policy and health care services to achieve physical, psychological and social well-being. In partnership with local hospitals and physician groups, it implements and promotes a health delivery system that ensures that Stanislaus County residents have access to quality health care. The Stanislaus County HSA offers a variety of programs aimed at supporting Stanislaus County residents living with HIV/AIDS including the Care Program and the AIDS Drug Assistance Program Services, including an anonymous, walk-in HIV clinic as well as an STD clinic with family planning services. HSA also operates a Medically Indigent Adult Program to indigent residents who would otherwise have little or no means of access to or coverage for medical services.

Interfaith Ministries

Interfaith Ministries of Greater Modesto serves thousands of individuals and families in Modesto, Ceres, Salida, Empire, and Waterford with emergency food and clothing and the food coalition.

Job Corps

The U.S. Department of Labor administers Job Corps which is a no-cost education and vocational training program for persons between the ages of 16 and 24 who qualify as low income. Job Corps helps young people learn a career, earn a high school diploma or GED, and find and keep a job.

Medical Life Support Program

A discount rate is offered to customers who depend on medical life support devices at home or whose qualified medical condition requires special heating or air conditioning needs. This discount halves the cost of the first 500 kilowatt hours (kWh) of electricity used in each billing cycle.

Modesto Irrigation District (MID)

MID Cares Program: The Modesto Irrigation District offers a 23 percent discount to eligible low-income customers on their monthly bill.

MID Weatherization Program: Provides energy-efficient measures to low-income rental or owner-occupied MID customers' homes. Work may include but is not limited to replacement of broken windows, refrigerator, and installation of insulation.

The National Alliance for Mental Illness (NAMI)

NAMI is the nation's largest grassroots mental health organization. With regard to employment assistance, NAMI provides informational resources detailing vocational programs available to persons with a mental illness, legal protections, and health coverage options.

Pacific Gas and Electric Company

The Pacific Gas and Electric Company (PG&E) operates the following programs for low-income people:

- California Alternate Rates for Energy (CARE) provides a monthly discount on energy bills for income-qualified households and housing facilities.
- Relief for Energy Assistance Through Community Help (REACH) provides emergency energy assistance to low-income families who are in jeopardy of losing their electric services. REACH is a one-time assistance program and is administered through the Salvation Army. Households who have experienced an uncontrollable or unforeseen hardship may receive an energy credit one time within an 18-month period.
- Energy Crisis Intervention Program uses State funds to provide assistance to low-income persons facing an energy-related crisis.
- Home Energy Assistance Program provides a direct energy assistance payment to a low-income customer's utility bill to help offset the high cost of heating and cooling.

The Salvation Army, Citadel

In addition to serving lunches to approximately 250 people per day, the Salvation Army also operates an emergency and transitional shelter for unaccompanied homeless veterans and non-veterans and adult women and men. The facility recently opened a health clinic which provides vision, dental, and basic medical care for homeless persons staying at the shelter. Currently, the Salvation Army is experiencing an increase in people needing food and clothing. This agency also offers a space for Narcotics Anonymous meetings, child care services, emergency response services, and a food and clothing closet for persons in need.

Stanislaus County Department of Aging & Veterans Services

The mission of this department is to maintain, enhance, and improve the quality of life for seniors in Stanislaus County by developing systems of home and community-based services, which promote independence and self-sufficiency. This department also provides assistance and advocacy to the men and women who served in the Armed Services of America, their dependents, and survivors and the general public in obtaining benefits and entitlements from the U.S. Department of Veterans Affairs, Department of Defense, and State and local agencies.

This department provides transportation services through Medi-Van to people in need of specialized medical attention in Bay Area hospitals and Veteran's Administration long-term care facilities. Through linkages with the CHSS, Central Valley Homeless Veterans, and the Housing Authority, homeless veterans are helped to find permanent housing. One of the main objectives of this department is to promote the value and benefit of hiring veterans, and to increase the understanding and awareness of veterans about entitlement and services.

Stanislaus County Workforce Development

The agency offers a variety of resources including job search assistance, resume development career counseling, occupational skills training, and job placement assistance in order to assist job seekers in

obtaining employment in Stanislaus County. This includes three Career Resource Centers in Stanislaus County which provide these services free of charge to the general public.

STANWORKS - Community Services Agency (CSA)

The Stanislaus County Community Services Agency (CSA) oversees the County's Welfare-To-Work program which helps CalWORKS customers find and keep a job. CalWORKS is a State welfare program that gives cash aid and services to eligible needy California families. The Welfare-To-Work program also includes assisting with job training to upgrade persons to higher paying jobs. This agency's mission is to protect children and adults who are at risk, preserve families, provide temporary economic assistance, promote personal responsibility in the areas of job readiness and self-sufficiency, and practice program and system integrity through innovative and effective business strategies.

TeleCare Corporation

Telecare Corporation is one of the nation's largest providers of adult mental health services to county and State governments and offers programs for individuals with co-occurring issues such as homelessness, substance abuse, developmental disabilities, or involvement in the forensic system. TeleCare manages one of Stanislaus County's Regional Service Teams, providing outpatient and intensive community support and mental health services to adults living in Stanislaus County. Services provided range from short-term interventions to long-term community treatment.

Turning Point (Empowerment Center)

Turning Point offers programs in seven California counties to assist persons with a mental illness. The Turning Point Empowerment Center in Modesto offers a variety of services to persons with a mental illness including housing and employment opportunities, links to treatment services for mental illness and co-occurring substance abuse problems, peer support, and reduced isolation.

TID Weatherization Program

Provides energy-efficient measures to low-income rental or owner-occupied TID customer's homes. Work may include but is not limited to replacement of broken windows, refrigerator, and installation of insulation.

Turlock Irrigation District

TID Cares Program: The Turlock Irrigation District offers a discount to eligible low-income customers on their monthly bills.

United Samaritans Foundation

The United Samaritans Foundation, as referenced within its mission statement, is an advocate for the poor in the spirit of the Christian tradition. The foundation searches for areas of need and explores creative and holistic ways to meet those needs. The United Samaritans Foundation currently operates the Daily Bread Ministries, which include four mobile food service trucks from facilities in the communities of Turlock, Hughson, and Modesto that deliver nutritious lunches to nine Stanislaus County communities every day of the year. Volunteers help staff the food pantry, clothes closet, and various other services. In

the City of Turlock, the foundation offers a place for homeless to receive mail, use the phone, shower, do laundry, and receive food and clothing. In Hughson, the Community Center complex includes a Stanislaus County Library, Stanislaus County medical office, pharmacy and cafe. This organization provides street outreach and free lunches to over 800 persons a day.

Valley Mountain Regional Center

The Valley Mountain Regional Center provides a variety of resources to children and adults with developmental disabilities in Stanislaus, San Joaquin, Amador, Calaveras, and Tuolumne counties. The Valley Mountain Regional Center provides some employment services for those with developmental disabilities including competitive employment, supported employment, sheltered employment, and prevocational training programs.

Veterans Administration

The U.S. Department of Veterans Affairs provides numerous benefits and services to veterans and their families including health care, vocational rehabilitation, education, and home loans. Some of the vocational training services provided include job training, employment accommodations, resume development, and job-seeking skills coaching. Additional services include assisting veterans in starting their own businesses or independent living services for those who are severely disabled.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Many of the agencies providing services to the homeless fall into more than one category. The most common overlap is between social service agencies serving the homeless and those that work with people in danger of becoming homeless. The agencies described in this section have been listed according to their primary function.

Affordable and Supportive Housing Projects

Through the CoC, Turning Point's Affordable and Supportive Housing Projects provide public support services to 21 unaccompanied adults with mental illness.

Center for Human Services (CHS)

The mission of CHS is to support the well-being of youth and families through quality prevention, education and counseling services, through programs that build and strengthen families and the neighborhoods in which they live, and in a way that honors and respects the diversity of the community.

Hutton House

Hutton House is an emergency shelter for runaway, homeless, and youth in crisis who are ages 13-17. It provides services in a residential setting for eight youth at a time for a maximum of 15 days. Day services are available for youth and their families. Crisis line is available 24 hours a day.

Pathways

Pathways is a transitional living and support services program that focuses on youth who have “aged out” of the foster care placement system and have limited financial and emotional support. Pathways addresses several individual and community challenges such as homelessness, substance abuse, unemployment, lack of basic living skills, mental and health issues, limited education, and preparation for adulthood. Services include residential component with a 16-bed capacity in an apartment setting with support services. Supportive services that are available through the program are case management, mentoring basic/life skills, counseling and resource development. The program also serves teen moms and their infant toddler children. This program is offered through the CHS and is for young adults aged 18-21.

Children’s Crisis Center (CCC) of Stanislaus County

The CCC is a nonprofit organization that provides childcare and shelter services to abused, neglected, and at-risk children in the community. It also provides overnight emergency shelter on an as-needed basis. Clients generally come as referrals from the police department and the Stanislaus County’s Child Protective Services. A 24-hour crisis intervention lines is also available for families in need. The following are facilities and services operated by CCC.

Community Housing and Shelter Services (CHSS)

CHSS is a nonprofit housing organization. This agency continues to be awarded funds to provide short-term rent, utility or mortgage assistance, tenant-based rental assistance, housing information, ESFP and TANF motel vouchers, housing for persons in recovery, and resource and referral services. This agency works with all city police departments, hospitals, mental health agencies, and all homeless providers throughout Stanislaus County including the Oakdale Soroptimists to provide opportunities to households with and without children to obtain and maintain permanent housing. CHSS is also involved with the Homeless Prevention and Rapid Re-Housing Program discussed above.

Community Impact Central Valley (CICV)

Community Impact Central Valley (CICV) provides services to individuals with HIV/AIDS through the Housing Opportunities for Persons with AIDS Program. Under HOPWA, CICV is able to assist persons that qualify with security deposit, first-month rent, mortgage assistance, rental assistance, utilities, and food depending on their need. CICV can assist these individuals for up to six months and participants must show proof of hardship.

CICV also serves veterans. Additionally, CICV serves families through its tenant-based rental program, permanent housing placement services, and supportive services. Under the tenant-based program, individuals and their families will be provided rental assistance for up to one year. The program is renewed on a yearly basis, and if qualifying, the family can receive assistance past a year. People may also receive

assistance, such as security deposit, first-month rent, credit check and utility hook-up, through CICV's permanent housing placement services. Lastly, CICV provides supportive services including transportation, food, and nutrition classes.

Cricket, Guardian, Marsha's, Sawyer, and Verda's Houses

The CCC Houses provide a shelter for up to 53 children, ages from birth to 17 years, who may be involved in a family crisis or a conflict situation. Individual, group, and family counseling is provided to residents. Program goals include the reunification of children with their families and the provision of follow-up and ongoing family counseling after the resident moves.

Family Promise

Family Promise of Greater Modesto is an interfaith ministry of 13 congregations in the Modesto area that provides transitional shelter at church sites and case management support for finding permanent affordable housing (Rapid Re-Housing) and other family support services to low-income homeless families with children.

Garden Gate Respite

Turning Point Respite Center at Garden Gate in Modesto provides a safe home-like environment for up to 12 homeless mentally ill persons nightly. This program links mentally ill homeless individuals to community resources while providing basic care such as home cooked meals and clothing. Open 24/7, the center works together with law enforcement to reduce incarceration and victimization. The center works with an outreach team to engage and connect individuals with needed services. Garden Gate Innovation is also operated by Turning Point.

Haven Women's Center of Stanislaus County

This center provides outreach to homeless women and children in the South Stanislaus County area and within the City of Modesto. Haven operates the Haven Shelter and Women's Haven. One is a four-bedroom house with kitchen, living room, children's room, three bedrooms, and an office. It provides 44 beds for women who have been abused or who are in life-threatening situations. The center also houses the children of abused women. Counseling services, weekly support groups, and legal advocacy programs are available.

Helping Others Sleep Tonight (HOST)

HOST is an emergency shelter in Patterson which houses up to eight homeless adult males throughout the coldest months of the winter. In collaboration with the Center for Human Services' Westside Family Resource Center, case managers also provide resource and referral services for all homeless persons in the area of Patterson.

Miller Pointe

The Miller Pointe project is a collaborative effort involving the Housing Authority and BHRS. The Housing Authority and BHRS are working together in order to develop affordable housing for individuals who are

receiving services through BHRS. Miller Pointe is a 15-unit permanent rental housing project serving very low-income households.

The Modesto Gospel Mission

This privately funded and faith-based shelter is located on a two-block campus that includes seven buildings. This agency provides a limited stay of seven nights on the floor, and three nights out, and also serves two meals a day (Monday through Friday), and three meals on the weekend. The mission serves 150,000 meals per year to clients and to the general public. The Gospel Mission serves approximately 2,500 people each year. The majority of men (95 percent) that arrive at the mission are locals raised in Stanislaus County and 60 percent are under 36 years of age. The following are facilities and services operated by Modesto Gospel Mission:

Mission Emergency Shelter

The mission provides beds for temporary shelter to house up to 100 unaccompanied adult men and women and up to 90 women and children for a maximum stay of fourteen days. Both missions require that those seeking shelter participate in religious activities (this requirement also exempts the missions from receiving any Federal or State funding assistance). Therefore, the missions must rely strictly on private donations from local churches and the community. Their program also includes Christian drug and alcohol rehabilitation group counseling to its clients.

New Life Program

Residential on-site program for up to 41 unaccompanied adult men and women who need specialized help to return to societal living including physical, spiritual, emotional, social, educational, vocational, employment, and financial programs designed to help them break the cycle of homelessness, despair and addiction.

Exodus

The Exodus Program offers up to 20 transitional beds to unaccompanied adult men and women who have successfully gone through the 30-day New Life Program yet require additional supportive housing before transitioning into stable permanent housing.

The Salvation Army of Stanislaus County

In addition to serving lunches to approximately 250 people per day, the Salvation Army also operates an emergency and transitional shelter for unaccompanied homeless veterans and non-veterans and adult women and men. The facility also recently opened a health clinic which provides vision, dental, and basic medical care for homeless persons staying at the shelter. The Salvation Army is currently experiencing an increase in people needing food and clothing. The agency also offers a space for Narcotics Anonymous meetings, a medical care center for homeless persons, childcare services, emergency response services, and a food and clothing closet for persons in need. The following are facilities and services operated by the Salvation Army:

- ***Berberian Emergency Shelter:*** The Berberian Emergency Shelter provides 100 cold weather beds to unaccompanied homeless adult men and women and up to 30 year-round beds to homeless persons with special medical needs.
- ***Berberian Transitional Living Facility:*** The Berberian Transitional Living Facility provides 20 beds for homeless male and female veterans and 20 beds for unaccompanied homeless males and females for up to 24 months. Participants of the Berberian Transitional Living Facility work with case managers to improve access to medical care, employment and permanent housing.

Stanislaus Affordable Housing Corporation (STANCO)

STANCO's mission is to promote the construction and development of affordable housing opportunities for residents of Stanislaus County. It currently operates eight properties for permanent affordable housing. STANCO conducts outreach to place people in supportive housing. It also provides transitional housing to assist the homeless, housing advocacy for renters, and the development of affordable housing. The agency's objective is to transition program participants from the streets to temporary housing, with the eventual goal of independent and permanent living arrangements. STANCO operates 33 transitional beds for homeless families with children and 37 beds for unaccompanied adult homeless males and females.

Stanislaus Regional Housing Authority (Housing Authority)

The Housing Authority administers 222 SPC Certificates (SOC 1 4 6,7) within Stanislaus County; of those 98 are utilized for individuals without children and 124 for families with children. Participants pay 30 percent of their income toward rent and receive supportive services through CICV, the Stanislaus County Department of Behavioral Health and Recovery Services or the Community Services Agency Services Agency. The Housing Authority also administers HUD-VASH vouchers which help provide permanent supportive housing to homeless veterans.

Turlock Gospel Mission (TGM)

Working with a variety of different churches throughout the City of Turlock, TGM provides a hot meal to homeless and food insecure guests 365 days a year. From mid-November until early April, TGM provides overnight shelter for up to 30 women and children each night. Staff works with guests to build relationships, support and encourage, in every way possible and to maintain security. Overnight guests eat dinner with other TGM guests, but instead of returning to the TGM building after dinner, they stay overnight at the host church for that week. A light breakfast is provided in the morning.

Turning Point

Turning Point Community Programs provides integrated, cost-effective mental health services, employment and housing for adults, children and their families that promote recovery, independence and self-sufficiency. They provide case management, crisis intervention, respite care, mentoring programs, and job training and transportation assistance to persons struggling to overcome mental illness throughout Stanislaus County. The following are facilities and services operated by Turning Point.

We Care Program

We Care originated from the Turlock Community Collaborative of 2003 as a result of the urgent need for an additional emergency shelter in Stanislaus County. The program is based in the City of Turlock, but serves the surrounding unincorporated communities with essential services for the homeless during inclement weather months. This program serves approximately 34 homeless individuals per night during the months of November through March. We Care is currently in the process of amending its Conditional Use Permit, through the City of Turlock, to add an additional 15 emergency shelter beds.

We Care also provides rental assistance in conjunction with intensive case management to place homeless families into permanent housing through their Rapid Re-housing Program.

MA-35 Special Needs Facilities and Services

Introduction

Many non-homeless individuals need supportive housing and services to enable them to live independently and to avoid homelessness or institutionalization, including those persons returning from mental health and physical health institutions. These subpopulations include but, are not limited to, the elderly, persons with physical, mental, or developmental disabilities, persons with HIV/AIDS, victims of domestic violence, children leaving group homes or aging out of foster care, farm workers, and substance abusers. The following are some of the facilities and services available to these subpopulations.

Note that many of the agencies noted below serve homeless persons belonging to these population groups as well.

Housing Opportunities for Persons with AIDS (HOPWA) Program

CICV provides services to individuals with HIV/AIDS through the Housing Opportunities for Persons with AIDS Program. Under HOPWA, CICV is able to assist persons that qualify with security deposit, first month of rent, mortgage assistance, rental assistance, utilities, and food depending on their need. CICV can assist these individuals for up to six months and participants must show proof of hardship. Additionally, CICV serves these families through its tenant-based rental program, permanent housing placement services, and supportive services. Under the tenant-based program, individuals and their families will be provided rental assistance for up to one year. The program is renewed on a yearly basis, and if eligible, the family can receive assistance past a year. People may also receive assistance, such as security deposit, first-month rent, credit check and utility hook-up, through CICV's permanent housing placement services. Lastly, CICV provides supportive services, including transportation, food, and nutrition classes, to people and their families that are experiencing AIDS.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs.

Elderly/Frail Elderly.

Many elderly persons (age 65+) have a fixed income and/or a disability. Affordable housing, including supportive housing, can help elderly residents. Because these residents often live alone and have limited mobility, smaller housing units located near public transportation, medical facilities, shopping, and other services are best suited to their needs. Elderly persons can often benefit from design considerations and disability modifications such as ramps and handrails to assist with mobility.

About 27,000 people in Stanislaus Urban County (5 percent of the population) and 9,500 in the City of Turlock (13 percent of the population) are over the age of 65. This number is projected to increase in the next five years.

Local agencies that provide services and resources to the elderly include: Area Agency on Aging, Howard Training Center, Healthy Aging, Catholic Charities, CRLA Senior Law Project, Valley Mountain Regional Center (foster grandparent and senior companion program), Adult Protective Services, AARP, ATEX Care, In-home Support Services, Lifeline Response Services (Golden Valley Senior Life Line), Program to Encourage Active and Rewarding Lives for Seniors (PEARL), Stanislaus Elder Abuse Prevention Alliance (SEAPA), and Society for the Blind (Senior Impact Project).

Persons with Disabilities

There are a variety of disabilities, including sensory, physical, mental, and developmental. Disabilities can result in mobility, self-care, and employment limitations. According to the Stanislaus County Housing Element there are approximately 37,333 persons in unincorporated Stanislaus County with a disability. Agencies that provide assistance to persons with disabilities include Disability Resource Agency for Independent Living (DRAIL), Modesto Independent Living Center, National Alliance for the Mentally Ill (NAMI), Howard Training Center, Stanislaus County Office of Education, Valley Mountain Regional Center, Ear of the Lion, Society for Handicapped Children and Adults, Vision Impaired Person Support, United Cerebral Palsy, California State Rehabilitation Department, BHRS (Inpatient, Permanent Supportive Housing Service, Street Outreach, and ACCESS Team), TeleCare Corporation, Turning Point (Empowerment Center) that provides countywide information or referrals on services and resources for persons with disabilities, and Stanislaus County and the City of Turlock with its HOME fund activity of emergency and major housing rehabilitation to address handicap accommodation retrofits.

Developmentally Disabled

Many developmentally disabled persons can live and work independently in a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

In addition to many of the services listed above, the California Department of Developmental Services currently provides community-based services to approximately 243,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based point of entry to services for people with developmental disabilities.

The Valley Mountain Regional Center in Stockton serves all of Stanislaus County. The center is a private, nonprofit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

Persons with Alcohol or Other Drug Addictions

A member of the CoC, Stanislaus Recovery Center through Stanislaus County's Behavioral Health and Recovery Services provides mental health and substance abuse services. Services offered include adult assessments, residential, withdrawal management, intensive outpatient treatment for substance use and co-occurring disorders.

Persons with HIV/AIDS

Community Impact Central Valley, a nonprofit housing agency supporting the homeless and disabled population in Stanislaus County, offers additional supportive services to the HIV positive population. The Stanislaus County Health Services Agency (HSA) provides HIV testing, AIDS Drug Assistance Program (ADAP), and a supportive services program.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

Residential care facilities provide supportive housing for persons with disabilities. The types of facilities available in the Stanislaus Urban County include:

- **Group Homes:** Facilities of any capacity and provide 24-hour non-medical care and supervision to children in a structured environment. Group homes provide social, psychological, and behavioral programs for troubled youths.
- **Adult Residential Facilities:** Facilities of any capacity that provide 24-hour nonmedical care for adults ages 18 through 59, who are unable to provide for their own daily needs. Adults may be physically handicapped, developmentally disabled, and/or mentally disabled.
- **Residential Care Facilities for the Elderly:** Facilities that provide care, supervision and assistance with activities of daily living, such as bathing and grooming. They may also provide incidental medical services under special care.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals (91.220(2)).

MA-40 Barriers to Affordable Housing

Describe any negative effects of public policies on affordable housing and residential investment.

Shortage of Affordable Housing Funding

The availability of funding for affordable housing has dropped dramatically in the past decade for all jurisdictions in California that do not have local public or private housing funds. Dissolution of redevelopment agencies in the State of California in 2012, including the Modesto Redevelopment Agency, resulted in a significant drop in funding for housing projects.

Competition for tax credits and other State funding with cities in California and diminished amounts of HUD funding create a shortage of affordable housing.

Climate Change

Climate change will impact Northern California by increasing periods of drought, changing seasonal temperature patterns, and increasing winds. Water availability is currently a concern within the County when considering housing development. Climate change will mostly likely exacerbate concerns about water availability.

Increased winds also lead to increased problems with above-ground power lines; undergrounding these lines is a solution to this problem but adds to the cost of the utility. For housing developers or municipalities, undergrounding power lines is an additional cost added to residential development.

Environmental Protection

While not directly intended to impact housing choice, the California Environmental Quality Act (CEQA), signed into law in 1970, is a statewide law that applies to all discretionary projects proposed to be conducted or approved by a public agency. The primary purpose of CEQA is to disclose significant environmental effects of a proposed project to the public and to limit these impacts when possible. CEQA also requires that public agencies publicly disclose the decision-making process behind project approval for the purpose of public participation in the environmental review process.

CEQA has been updated several times between 2011 and 2019 to streamline infill development and update exemptions to transit-oriented and mixed-use development, among other updates. Affordable Housing in urban areas is also exempt under certain circumstances (14 CCR § 15194).

Growth Management

Growth management policies aim to control the progression and speed of development, balancing the needs of a community's existing residents while preparing for the community's future. Growth management policies can become impediments to housing choice, however, when the policy hinders the jurisdiction meeting local affordable housing needs. Growth management policies aren't usually condensed within a single policy or program but exist within a collection of codes, plans, or ordinances that direct the rate and intensity of new development. Urban growth boundaries (the outermost extent of anticipated urban development), limits on the total number of dwelling units that may be permitted, or special conditions on new development can all be considered growth management policies. State housing law mandates a jurisdiction facilitate the development of a variety of housing to meet the jurisdiction's fair share of regional housing needs. Any growth management measure that compromise a jurisdiction's ability to meet its regional housing needs may have an exclusionary effect of limiting housing choices.

Local jurisdictions within Stanislaus County have various local policies and voter initiatives that may impact housing development directly and indirectly including those that aim to support the conservation of agricultural land. Agriculture is the area's number one industry for economic output and employment, creating a multiplier effect for job creation. The conservation of agricultural land is important to the overall economic health of the community but must be balanced with the needs for housing to support the local workforce in all economic sectors of the community. Over time, as available land not impacted by growth measures begins to decline, there may be a direct impact on the development of affordable housing. However, changes in state laws regarding vehicle miles traveled and greenhouse gas reduction requirements, and the increasing costs of extending infrastructure outward, have led to many jurisdictions looking for increased infill development opportunities. Grant funding available for infrastructure, such as sewer and water line extensions and improvements, allows jurisdictions to increase their density within exiting urbanized areas.

Planning and Development Fees

Housing development imposes short- and long-term costs upon local government, such as the cost of providing site reviews, permitting and inspection, and maintaining General Plan and zoning regulations addressing housing development. Jurisdictions also charge impact fees to offset the cost of providing the infrastructure and public facilities that are required to serve new housing development. To help recoup costs and ensure that essential services and infrastructure are available when needed, Stanislaus County jurisdictions charge various types of development fees. The fee amounts vary based on the needs of each jurisdiction and the services provided.

The fees can be a significant factor in housing development throughout California, raising housing costs and disincentivizing new residential development, factors that contribute to statewide high housing costs. Among California jurisdictions, fees account for between six and eighteen percent of the price of housing. (Terner Center for Housing Innovation- UC Berkeley, It All Adds Up: The Cost of Housing Development Fees in Seven California Cities, March 2018)

As a best practice, the public and developers should be able to access a jurisdiction's current fee schedules to estimate fees as a part of total development project costs in advance.

Until 1978, property taxes were the primary revenue source for financing the construction of infrastructure and improvements for residential development in California. Proposition 13, passed in 1978, limited a local jurisdiction's ability to raise property taxes and increasing reliance on other funding sources to provide infrastructure, public improvements, and public services. An alternative funding source widely used among local governments in California is the development impact fee, which is charged to the project developers/owners, for publicly provided infrastructure that supports the development, including water and sewer facilities, parks, and transportation.

For jurisdictions to charge an impact fee, the California Mitigation Fee Act requires that the jurisdiction demonstrate the "nexus" between the type of development in question and the impact being mitigated by the proposed fee, and that fee amount be proportional to the impact caused by the development. Fees not covered by the California Mitigation Fee Act include inclusionary housing ordinance in-lieu fees, permit processing fees, utility connection fees, and fees included within specific development agreements between a jurisdiction and a developer.

Despite state law limiting direct impact fees, the fees can be a large part of a jurisdiction's total fee requirements for housing development. Because developers tend to pass these fees onto the final housing owner, the effects of reducing these fees on housing affordability depend on the amount of the fee reduction and current home prices. Because the eventual owner bears the brunt of fees, high fees limit development of lower-cost housing more than higher-cost housing (Turner Center for Housing Innovation- UC Berkeley, Current Practices and Policy Considerations to Improve Implementation of Fees Governed by the Mitigation Fee Act, August 2019).

A reduction in development fees for low-income housing may help these projects become financially feasible. A jurisdiction deferring development fees until a certain time after project completion can also help add flexibility the project's upfront costs and assist in the development of low-income housing.

Prevailing Wages

Davis-Bacon prevailing wage must be paid to laborers when federal Community Development Block Grant (CDBG) dollars are used to pay for any construction project over \$2,000 or on any multifamily housing project over eight units. Prevailing wage must also be paid on any HOME-funded multifamily housing project that directly funds twelve or more units. While competitive wages are currently high, Davis-Bacon wages may be higher and add additional cost to housing construction and rehabilitation activities.

California's Prevailing Wage Law requires contractors to pay minimum wage rates on public works projects that support housing construction such as roads, water and sewer projects, and other public utilities. The rates are set by the California Department of Industrial Relations. These additional costs could add to local costs for housing development.

MA-45 Non-Housing Community Development Assets

Economic Development Market Analysis

Stanislaus County is located within a historic center of agriculture in California, the San Joaquin Valley. In addition to agricultural and food processing industries within the County, diverse industries and skilled jobs are also situated 90 miles to the west in San Francisco in 90 miles to the north in Sacramento. Stanislaus County struggles locally with high unemployment despite proximity to these industry centers due to an education/skills gap and loss of jobs overseas.

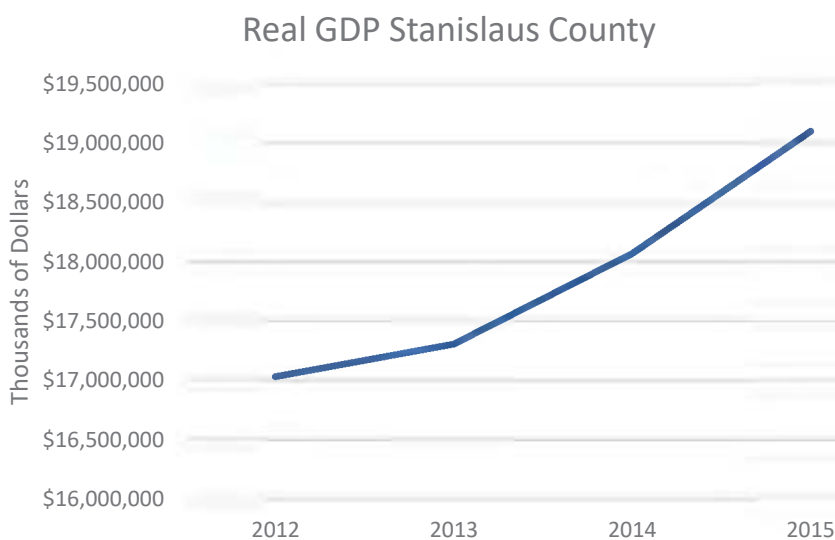
The City of Turlock has fared better in economic development than many parts of the County. Turlock has a more educated workforce and above-average wages by employment sector. Major industries include health care, education, manufacturing, agriculture, and logistics, and the City has a healthy downtown containing retail, offices, personal services, and bars/restaurants. An education/skills gap does exist in the City for specific technical industries that struggle with labor shortages.

Business Activity

Top Employers Expected to Grow		
Employer Name	Location	Industry
Amazon Fulfillment Center	Patterson	Mail Order Fulfillment Service
Bartles & Jaymes Co	Modesto	Wineries (manufacturers)

Bronco Wine Co	Ceres	Wineries (manufacturers)
City-Modesto-Police Dept	Modesto	Police Departments
Conagra Brands Inc	Oakdale	Food Products (wholesalers)
Del Monte Foods Inc	Modesto	Food Products & Manufacturers
Doctors Medical Center	Modesto	Hospitals
E & J Gallo Winery	Modesto	Wineries (manufacturers)
Emanuel Medical Center	Turlock	Hospitals
Frito-Lay Inc	Modesto	Potato Chips (wholesalers)
Health Services Agency	Modesto	Clinics
Kaiser	Modesto	Hospitals
Macdonald Group	Modesto	Real Estate
Memorial Medical Center	Modesto	Hospitals
Modesto Irrigation District (MID)	Modesto	Utilities
Modesto Bee	Modesto	Newspapers (publishers)
Nor Cal Nursery	Turlock	Fruits & Vegetables-Wholesale
Oak Valley Hospital District	Oakdale	Health Care Management
Patterson City Office	Patterson	Government Offices-City/Village & Township
Stanislaus County Health Services	Riverbank	Clinics
Community Services Agency	Modesto	Government Offices-County
Storer Coachways	Modesto	Buses-Charter & Rental
Sysco Central California Inc	Modesto	Food Products (wholesalers)
Temsa	Turlock	Nonclassified Establishments
Turlock Irrigation District	Turlock	Electric Companies
Walmart	Modesto	Department Stores

Source: State of California Employer Development Department (EDD)



Source: Bureau of Labor Statistics

Projected Industry Growth

Industry	2016 Employment	Projected 2026 Employment	Percentage Change (%)
Self Employment	13,300	14,300	7.6
Private Household Workers	200	200	0
Total Farm	14,900	15,200	2
Total Nonfarm	171,500	192,800	12.4
Mining, Logging, and Construction	9,000	10,300	14.4
Manufacturing	21,800	21,800	0
Durable Goods Manufacturing	6,200	6,200	0
Nondurable Goods Manufacturing	15,600	15,600	0
Food Manufacturing	9,400	9,200	-2.1
Trade, Transportation, and Utilities	37,100	40,700	9.7
Wholesale Trade	6,100	6,500	6.6
Retail Trade	22,700	23,600	4
Food and Beverage Stores	4,300	4,400	2.3
Clothing and Clothing Accessories Stores	2,300	2,200	-4.3
General Merchandise Stores	5,000	5,100	2
Transportation, Warehousing, and Utilities	8,200	10,600	29.3
Information	1,000	1,000	0
Financial Activities	5,300	5,600	5.7
Professional and Business Services	14,600	16,000	9.6
Administrative and Support and Waste Management and Remediation Services	7,500	8,200	9.3
Educational Services (Private), Health Care, and Social Assistance	31,100	40,700	30.9
Educational Services (Private)	1,600	1,800	12.5
Health Care and Social Assistance	29,500	38,900	31.9
Leisure and Hospitality	18,700	21,900	17.1
Other Services (excludes Private Household Workers)	5,400	6,000	11.1
Government	27,600	29,000	5.1
Federal Government	800	1,000	25
State and Local Government	26,800	28,000	4.5
State Government	2,000	2,200	10
State Government Education	1,700	1,900	11.8
Other State Government	300	300	0
Local Government	24,800	25,800	4
Local Government Education	15,500	16,300	5.2
Other Local Government	9,300	9,500	2.2
Total Employment	199,900	222,500	11.3

Source: State of California Employer Development Department (EDD)

Labor Force

Many of Stanislaus County's workers leave the County every day for jobs in the San Francisco Bay Area that require a high level of education and skills, leaving the County with a shortage of these workers in the local workforce. The workers not commuting out of the County may have education/skill gaps for local jobs; many companies post job openings but struggle to find workers with the required skills.

Unemployment Rate and Labor Force by City (Not Seasonally Adjusted)

October 2019	Labor Force	Employment	Unemployment Number	Unemployment Rate
Stanislaus County	244,600	232,700	11,900	4.9%
Ceres	21,700	20,400	1,200	5.7%
Hughson	3,200	3,000	200	5.0%
Modesto	95,900	91,400	4,500	4.7%
Newman	4,500	4,300	300	5.6%
Oakdale	9,500	9,000	500	5.4%
Patterson	10,100	9,700	500	4.8%
Riverbank	11,900	11,500	400	3.6%
Turlock	34,400	33,000	1,400	4.1%
Waterford	3,500	3,200	300	8.7%

Source: California Employment Development Department

Stanislaus County loses much of its skilled workforce during the day to jobs outside of the County. Nearly 80,000 people choose to commute to jobs in the Bay Area or Sacramento that generally pay much higher than local jobs.

Stanislaus Planning Area

Occupations by Sector	Number of People
Management, business and financial	23,515
Farming, fisheries and forestry occupations	7,883
Service	17,445
Sales and office	21,054
Construction, extraction, maintenance and repair	17,006
Production, transportation and material moving	19,591

Source: 2012-2016 ACS

City of Turlock

Occupations by Sector	Number of People
Management, business and financial	9,591
Farming, fisheries and forestry occupations	1,617
Service	5,345
Sales and office	7,094
Construction, extraction, maintenance and repair	3,357
Production, transportation and material moving	4,908

Source: 2012-2016 ACS

Travel Time – Stanislaus County

Travel Time	Number	Percentage
< 30 Minutes	131,450	67%
30-59 Minutes	42,908	22%
60 or More Minutes	22,779	12%
Total	191,137	

Source: 2012-2016 ACS

Travel Time – City of Turlock

Travel Time	Number	Percentage
< 30 Minutes	20,791	73%
30-59 Minutes	5,556	20%
60 or More Minutes	2,008	7%
Total	28,355	

Source: 2012-2016 ACS

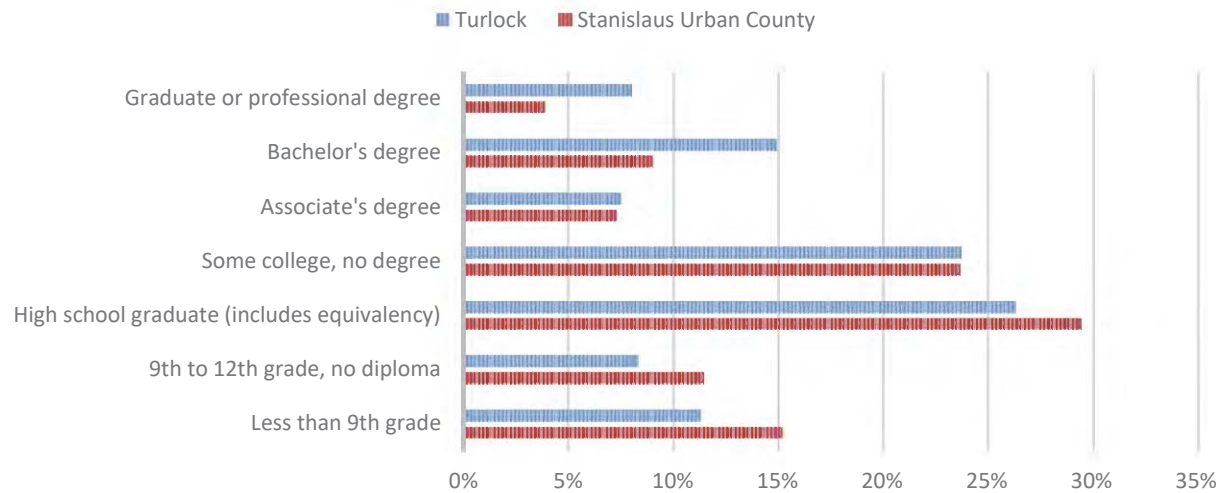
Education

The skills gap between local workers and the requirements of specific industries leaves both residents who would like employment (or better paying employment) and local employers with worker shortages. Stanislaus County has several institutions attempting to close this gap.

California State University, Stanislaus has a student body of 9,000 and includes the Office of University Extended Education (UEE) which offers non-traditional university degrees, certificate programs, specialized training and service. (An Accelerated Second Bachelor of Science in Nursing Program, internships that meet the California Commission on Teacher Credentialing (CCTC) requirements, an online training in hospitality are examples.)

Modesto Junior College serves 24,000 students and offers many career-focused degrees like a degree in respiratory care, nursing, business administration, and sports medicine.

EDUCATIONAL ATTAINMENT: POPULATION 25 YEARS AND OLDER



Source: 2012-2016 ACS

Workforce Participation by Educational Attainment - Part A

	Stanislaus County	Turlock
	Labor Force Participation Rate	Labor Force Participation Rate
Population 25 to 64 years	74.3%	76.4%
Less than high school graduate	64.7%	67.2%
High school graduate (includes equivalency)	72.5%	74.0%
Some college or associate's degree	76.8%	77.2%
Bachelor's degree or higher	84.1%	84.0%

Source: 2012-2016 ACS

Workforce Participation by Educational Attainment - Part B

Educational Attainment: Population 18 to 24 Years	Stanislaus County	Stanislaus Urban County	Stanislaus Planning Area	Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford
Less than high school graduate	11.60%	12.17%	11.53%	14.60%	14.90%	17.70%	3.40%	9.90%	10.70%	9.40%	14.20%
High school graduate (includes equivalency)	37.50%	40.24%	38.03%	36.40%	18.80%	47.20%	49.40%	34.40%	38.40%	30.50%	51.80%
Some college or associate's degree	46.80%	44.73%	46.66%	46.50%	56.70%	35.10%	42.10%	54.30%	49.50%	53.20%	33.20%
Bachelor's degree or higher	4.10%	2.86%	3.78%	2.50%	9.60%	0.00%	5.00%	1.40%	1.40%	6.90%	0.80%
Educational Attainment: Population 25 Years and Over	Stanislaus County	Stanislaus Urban County	Stanislaus Planning Area	Ceres	Hughson	Newman	Oakdale	Patterson	Riverbank	Turlock	Waterford
Less than 9th grade	12.20%	15.19%	14.29%	17.60%	10.50%	13.10%	4.50%	14.80%	15.40%	11.30%	21.70%
9th to 12th grade, no diploma	10.20%	11.46%	10.73%	13.40%	9.10%	11.20%	7.70%	10.80%	9.80%	8.30%	15.10%
High school graduate (includes equivalency)	28.10%	29.41%	28.70%	28.90%	24.10%	34.70%	29.80%	32.30%	29.00%	26.30%	25.90%
Some college, no degree	25.20%	23.67%	23.68%	23.10%	27.40%	26.70%	31.40%	25.40%	24.60%	23.70%	21.00%
Associate's degree	7.80%	7.32%	7.36%	7.10%	9.00%	4.90%	10.10%	7.30%	7.00%	7.50%	7.50%
Bachelor's degree	11.10%	9.05%	10.39%	7.70%	11.50%	8.40%	10.10%	6.90%	10.30%	14.90%	5.00%
Graduate or professional degree	5.40%	3.90%	4.86%	2.40%	8.40%	1.00%	6.30%	2.50%	3.80%	8.00%	3.70%

Source: 2012-2016 ACS

Median Earnings in the Past 12 Months

Educational Attainment	Stanislaus County	Turlock
Less than high school graduate	\$21,620	\$25,215
High school graduate (includes equivalency)	\$29,737	\$27,477
Some college or Associate's degree	\$35,533	\$31,806
Bachelor's degree	\$53,112	\$53,010
Graduate or professional degree	\$74,335	\$74,602

Source: 2012-2016 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Below are the industries with the greatest projected growth by 2026; the expected growth percentage from 2016 to 2026 is in parenthesis:

- Healthcare, Educational services, and social assistance (31.9%)
- Transportation, warehousing, and utilities (29.3%)
- Leisure and hospitality (17.1%)

Describe the workforce and infrastructure needs of the business community.

The Comprehensive Economic Development Strategy cites aging infrastructure as a hinderance to future economic growth. The updated documents says the following on infrastructure needs:

- One of the other main obstacles to economic growth is Stanislaus County's aging infrastructure. In 2008, the County made a concerted effort to align the regions' transportation planning document, Regional Transportation Plan (RTP), with its own Capital Improvement Program (CIP), and the regions Public Facilities Financing Plan (PFF). This alignment gave clear direction on needs and project priority.
- In the two years prior to 2016 State revenues were reduced by more than 30% making it difficult to maintain and advance our transportation network. Local and state spending in transportation infrastructure took a major leap forward by the passage of Measure L locally in 2016 and the passage of SB 1 in 2017 by the California Legislature. The new self-help status will leverage State and Federal transportation funds to advance many regional capacity and safety projects and provide much needed funds to maintain our roadway system. However, even with the two new funding sources, Stanislaus County has an overall Pavement Condition Index of 57 out of 100, which is poor, and 224 aging bridges, which on average are ready for replacement today.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The Comprehensive Economic Development Strategy cites workforce educational attainment as a primary barrier to economic growth:

- Workforce skill levels and high school graduation rates are a significant impediment to economic growth. At the same time, global competition and technological advances are continually increasing the need for a skilled workforce. Stanislaus County lags well behind nationwide educational attainment averages in most categories. A dearth of four-year and advanced degrees is particularly telling as is the nearly 24% of those 25 years and older with less than a High School education.
- There were considerable layoffs in the private sector before 2017 that impacted the local economy. These job losses have impacted all major areas but have hit food processing areas especially hard. The impact includes processors of fruits and vegetables, confectioners, poultry processors, and cheese manufacturers. Major layoffs compound Stanislaus' already high unemployment rate. Notably, many of the reductions have occurred because of the off-shoring of production or foreign competition. Since 2017, many of these industries have added jobs, but a major challenge has been the lack of skilled workers. Another positive trend in the local economy has been a diversification but with that comes a greater demand for people with specific

job skills. Whereas workforce reductions have taken a major toll on production related sectors, retailers and distributors were and continue to be a major area of expansion in Stanislaus County.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Throughout the Urban County small business training and development is supported by the Valley Sierra Small Business Development Center (SBDC) and the University of California Merced SBDC, and California State University Stanislaus.

Turlock Unified School District offers Career Technical Education (CTE) courses in Medical fields and Agricultural Science as well as Culinary Arts. These themes begin in elementary school and carry through middle and high school and are continued at Modesto Junior College (MJC) as well. MJC offers curricula in a number of career paths including health and respiratory therapy, agriculture, irrigation technology, industrial electronics and machining.

The Stanislaus Worknet Alliance is the Workforce Development Board for the County and is charged with coordinating resources for a wide range of workforce training program. This agency is particularly focused on on-the-job training and serving young workers in the 18-24 year age group. About one quarter of the youth they serve are still in school, but the remainder are out of school. The programs require income eligibility and range from on the job subsidized work experience to apprenticeships in coordination with Labor Councils and other outside training organizations. The Alliance is particularly focused on gaining employer input to needed training and also employs a consultant (Opportunity Stanislaus) to conduct an outreach program to employers.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes, both Stanislaus County and the City of Turlock have economic development plans that have recently been updated:

- Stanislaus County Comprehensive Economic Development Strategy 2019-2024
- City of Turlock Economic Development Strategic Plan 2017

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Both the County and Turlock economic development plans include diverse goals.

Stanislaus County:

- Encourage and support new business innovation and entrepreneurs
- Promote the region as a tourism destination
- Encourage the further development of a vibrant ag-based economy looking for ways to add new products, generate food and beverage innovation, and promote our products and services

- Develop specialized education including higher education, career technical education, and workforce development
- Support the development of college level program infrastructure to provide opportunities for students to learn and stay here
- Enhance goods movement transportation projects that build capacity while increasing safety, decreasing congestion, improving air quality and promoting economic development
- Develop wet and dry utility infrastructure to increase business development interest
- Participate in the development of comprehensive regional water planning
- Continue to promote accessibility and utilization of advanced communications services (through targeted technology training efforts, etc.) as fundamental and necessary for all residents and businesses.

City of Turlock

- Create conditions conducive to attract retail and expand existing businesses in Turlock.
- The Turlock economic development partners will work in a coordinated manner to increase job opportunities in the city through agriculture, manufacturing, logistics and medical services clusters.
- Downtown will be the business and cultural center of the city.
- Turlock retail centers will remain competitive and address available market opportunities.
- The community will host a wide variety of tourism and community events.
- Turlock will support start up and existing small business activities.
- Our educational system will build a citizenry which will prepare our 21st century workforce.
- Turlock will be a cultural leader in the central valley with access to art, music and other cultural events.
- Turlock will provide the necessary economic foundations and support services that allow workers at all socioeconomic levels to access and maintain living wage jobs.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

In conjunction with the Needs Assessment and Market Analysis sections of this Con Plan, the Strategic Plan identifies the Stanislaus Urban County and City of Turlock's priority needs and describes strategies that will be undertaken to serve the priority needs. The Strategic Plan includes the following sections:

- Geographic Priorities
- Priority Needs
- Influence of Market Conditions
- Anticipated Resources
- Institutional Delivery Structure
- Goals
- Public Housing
- Barriers to Affordable Housing
- Homelessness Strategy
- Lead-Based Paint Hazards
- Anti-Poverty Strategy
- Monitoring

SP-10 Geographic Priorities

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA).

Stanislaus County and Turlock do not have plans to pursue any official HUD designated geographic based priority areas. Funds will be allocated within each jurisdiction based on program eligibility and in accordance with priority needs and goals outlined in this section.

SP-25 Priority Needs

Priority Needs

1	Priority Need Name	Public Infrastructure and Facility Improvement
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Frail Elderly Public Housing Residents Chronic Homelessness Individuals People with Mental Illness People with Chronic Substance Use Disorders Veterans

	Persons with HIV/AIDS Survivors of Domestic Violence People with Mental Disabilities People with Physical Disabilities People with Developmental Disabilities People with Alcohol or Other Addictions Non-Housing Community Development						
Geographic Areas Affected	Stanislaus Urban County: Ceres, Hughson, Oakdale, Patterson, Newman, Riverbank, Waterford and the County's Unincorporated Turlock						
Associated Goals	Improve Public Infrastructure Administration						
Description	The Stanislaus Urban County and Turlock will continue addressing infrastructure improvement needs in low-income neighborhoods to create improved suitable living environments.						
Basis for Relative Priority	Throughout the Stanislaus Urban County and City of Turlock, there are neighborhoods and communities with minimal or non-existent public infrastructure. This round of Consolidated Planning process again reaffirmed the community's desire for public infrastructure improvements especially in the low-income communities. Projects will include but are not limited to public sewer and water system installations as well as public sewer and water system repairs, curb, gutter and sidewalk installation and repairs, storm drain improvements, and improvements that provide greater accessibility. Projects under this goal may include other CDBG eligible non-housing community development infrastructure improvements, primarily within the incorporated boundaries where public sewer and water systems already exist.						
2	<table> <tr> <th>Priority Need Name</th><td>Affordable Housing</td></tr> <tr> <td>Priority Level</td><td>High</td></tr> <tr> <td>Population</td><td> Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals People with Mental Illness People with Chronic Substance Use Disorders </td></tr> </table>	Priority Need Name	Affordable Housing	Priority Level	High	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals People with Mental Illness People with Chronic Substance Use Disorders
Priority Need Name	Affordable Housing						
Priority Level	High						
Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals People with Mental Illness People with Chronic Substance Use Disorders						

	<p>Veterans</p> <p>Survivors of Domestic Violence</p> <p>People with Physical disabilities</p> <p>People with Alcohol or Other Addictions</p>
Geographic Areas Affected	<p>Stanislaus Urban County: Ceres, Hughson, Oakdale, Patterson, Newman, Riverbank, Waterford and the County's Unincorporated</p> <p>Turlock</p>
Associated Goals	<p>Provide Public Services</p> <p>Administration</p>
Description	<p>The City of Turlock and the Stanislaus Urban County intend to use a portion of their CDBG allocation and all of their HOME allocation to fund affordable housing activities. These affordable housing activities are varied and may include property acquisition to ensure affordable housing development, homeownership and rental rehabilitation, and down payment assistance, among other opportunities that may present that will contribute to affordable housing in Turlock or Stanislaus County.</p>
Basis for Relative Priority	<p>According to data provided in the Needs Assessment and the Market Analysis completed as part of this Consolidated Plan, high housing cost burden, overcrowding, and low vacancy rates create a high need for affordable housing. Those households most impacted by these issues are low- and moderate-income households. Based on this data and the housing market analysis completed as part of this Con Plan, the Stanislaus Urban County and City of Turlock will pursue the creation of affordable housing (new unit production and conversion or preservation) as resources are available, which will benefit low-income households, homeless persons, households at-risk of homelessness and those with special needs. Home ownership will be encouraged and made available for low and moderate households through the First-time Homebuyer program.</p>

3

Priority Need Name	Community and Economic Development
Priority Level	High
Population	<p>Low</p> <p>Other</p>
Geographic Areas Affected	<p>Stanislaus Urban County: Ceres, Hughson, Oakdale, Patterson, Newman, Riverbank, Waterford and the County's Unincorporated</p> <p>Turlock</p>

4	Associated Goals	Provide Public Services Community Emergency Response Program Administration
	Description	The Stanislaus Urban County and City of Turlock will provide technical assistance to small businesses to assist with capacity building, including strategic planning, operations, marketing, and finance assistance. In response to the Coronavirus/COVID 19, there is a need to assist business with the financial relief needed for recovery. The exact nature of the needs business will face is still unclear, but the Stanislaus Urban County and the City of Turlock will develop financial relief programs aimed at meeting needs as they evolve.
	Basis for Relative Priority	Small businesses in Stanislaus Urban County and City of Turlock have identified a need locally for technical assistance with capacity building. Small start-up businesses who desire to expand but lack the capacity to do so will receive technical assistance with financial reporting systems, developing a business strategy, designing a company website, and/or enhance marketing efforts. Fair Housing and Tenant/Landlord Services will also be provided to improve the quality of rental housing. In response to Coronavirus/COVID 19, the Stanislaus Urban County and City of Turlock will work with eligible small business to offer financial relief programs.
	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly

	<p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Persons with Developmental Disabilities</p> <p>Persons with Alcohol or Other Addictions</p> <p>Persons with HIV/AIDS and their Families</p> <p>Victims of Domestic Violence</p> <p>Non-housing Community Development</p>
Geographic Areas Affected	<p>Stanislaus Urban County: Ceres, Hughson, Oakdale, Patterson, Newman, Riverbank, Waterford and the County's Unincorporated</p> <p>Turlock</p>
Associated Goals	<p>Provide Public Services</p> <p>Work to End and Prevent Homelessness</p> <p>Economic Development</p> <p>Administration</p>
Description	<p>The Stanislaus Urban County and the City of Turlock will utilize up to a maximum of 15% of its annual award for the provision of public services. Public services include services targeted to extremely low, low, and moderate-income families and individuals, as well as services targeted to special populations such as at-risk youth, persons over 62 years of age, or persons with disabilities.</p>
Basis for Relative Priority	<p>The needs assessment and Market Analysis indicate a great need for public services for extremely low- and low-income households, the elderly, persons with disabilities, and at-risk youth. Public service programs help these vulnerable populations meet their basic needs, such as food and shelter, and provide them with the resources and referrals for any additional needed services. Through supporting the meeting of basic needs, these individuals and families may focus their resources on other things that may increase their overall economic and financial stability.</p>

5

Priority Need Name	Homeless Services
Priority Level	High
Population	<p>Extremely Low</p> <p>Large Families</p> <p>Families with Children</p> <p>Elderly</p> <p>Rural</p> <p>Chronic Homelessness</p> <p>Individuals</p> <p>Families with Children</p>

	<p>Mentally Ill</p> <p>Chronic Substance Abuse</p> <p>Veterans</p> <p>Persons with HIV/AIDS</p> <p>Victims of Domestic Violence</p> <p>Unaccompanied Youth</p>
Geographic Areas Affected	<p>Stanislaus Urban County: Ceres, Hughson, Oakdale, Patterson, Newman, Riverbank, Waterford and the County's Unincorporated</p> <p>Turlock</p>
Associated Goals	<p>Provide Public Services</p> <p>Work to End and Prevent Homelessness</p> <p>Administration</p>
Description	<p>Both the Stanislaus Urban County and City of Turlock allocates up to 15% of each annual award for public services grants some of which include programs that provide homeless services. Stanislaus Urban County utilizes 7.5% of its annual ESG award for Admin, a maximum of 10% for HMIS Activities, maximum of 60% for emergency shelter activities, and a minimum of 40% for Homeless Prevention and Rapid Re-Housing Activities. HMIS Activity funds will be utilized to work with the Stanislaus CoC on coordinated assessment, outreach, and data collection. Affordable housing activities, as described in Priority Need 2 – Affordable Housing, will also be a part of the regional approach to solving homelessness.</p>
Basis for Relative Priority	<p>As discussed in greater detail in the Needs Assessment, homeless individuals were counted as part of Stanislaus County's 2019 Point-In-Time (PIT) count, including those who were unsheltered. The data indicates a need to support programs that serve individuals and families experiencing homelessness. Homelessness was also identified as a High priority in the community input from stakeholders and the public at-large. The Stanislaus Urban County and City of Turlock will focus CDBG, HOME, and ESG resources on shelter, rental assistance, and affordable housing, which is crucial to both preventing and ending homelessness. Both entities will also work closely with the Stanislaus CoC to ensure that ESG programs are working collaboratively with Stanislaus CoC Transitional and Permanent Supportive Housing programs.</p>
6 Priority Need Name	Community Emergency Responses
Priority Level	High
Population	<p>Extremely Low</p> <p>Large Families</p>

	Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Small Businesses
Geographic Areas Affected	Stanislaus Urban County: Ceres, Hughson, Oakdale, Patterson, Newman, Riverbank, Waterford and the County's Unincorporated Turlock
Associated Goals	Provide Public Services Work to End and Prevent Homelessness Economic Development Community Emergency Response Program Administration
Description	Projects under this goal will support small businesses, Urban County members and agencies address community emergency needs as a result of pandemic related issues.
Basis for Relative Priority	As a response to COVID 19, the Stanislaus Urban County will strategically plan to address small businesses, Urban County members, residents and service providers effected by the pandemic.

Narrative (Optional)

Priority needs are those that were identified through data collection in the Needs Assessment and Market Analysis, as well as survey results, consultations with stakeholders and the community at-large. All of the needs identified above are identified as "High" priority – this is because the needs identified were found to be true among all sources: citizen participation, stakeholder consultation, and data analysis.

SP-35 Anticipated Resources

Introduction

During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$2.3 million annually in CDBG funding, for a five-year total of \$11.5 million. During the five-year Con Plan period, the Stanislaus Urban County expects to receive approximately \$200,000 annually in ESG funding, for a five-year total of \$1.0 million. In addition, Stanislaus County, as the Administrative Entity (AE) for the local CoC for the state CA-ESG program, expects to use \$1.3 million within the next five years. Stanislaus County is the Administrative Entity (AE) on behalf of the CoC for the state's California Emergency Solutions and Housing (CESH) and the California Emergency Solutions Grant (CA-ESG) program. Stanislaus County also expects to use \$300,000 in CalHOME Program Income for housing related activities and administration costs over the five-year Con Plan period.

During the five-year Con Plan period, the City of Turlock expects to receive \$650,000 annually in CDBG funding, for a five-year total of \$3.25 million. The HOME Consortium also anticipates an estimated \$1.2 million in annual HOME funds, for a five-year total of \$6.0 million. The City of Turlock expects to use \$1,700,000 in CalHOME funding for housing activities and administrative costs over the five-year Con Plan period.

The table below provides a breakdown of these anticipated resources, which are based on the Fiscal Year ~~2015-2016~~ **2020-2021** allocations.

Anticipated Resources (Stanislaus Urban County)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	public - federal	<ul style="list-style-type: none"> Infrastructure Property Acquisition Admin and Planning Housing Public Facility Improvements Public Services 	\$2,310,165	\$2,400	0	\$2,312,565	\$11,562,825

ESG	public - federal	<ul style="list-style-type: none"> Overnight shelter Rapid re-housing Rental Assistance Services Homeless Prevention Services HMIS Data System Support 	\$202,628	\$0	0	\$202,628	\$1,013,140
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Anticipated Resources (City of Turlock)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	public - federal	<ul style="list-style-type: none"> Acquisition Admin and -Planning Economic Development Housing Public Improvements Public Services 	\$657,574	0	0	\$657,574	\$3,287,870
HOME	public - federal	<ul style="list-style-type: none"> Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction 	\$1,363,238	0	0	\$1,363,238	\$6,816,190

		<ul style="list-style-type: none"> • Multifamily rental rehab • New construction for ownership • TBRA 					
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It is important to understand that during the development of this Consolidated Plan, the County, all Urban County Cities, and the City of Turlock were put in a position to react to the unique Coronavirus, COVID-19. In April 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act (CARES). The CARES allocated CDBG and ESG funds to entitlement grantees to be used to respond the COVID-19 outbreak, navigating the varied impacts. Stanislaus Urban County received CDGB and ESG funds, and the City of Turlock received CDBG funds, to be programed under the previous 2015-2020 Con Plan and 2019-2020 AAP cycles in the following amounts:

Stanislaus Urban County

- CDBG-CARES - \$1,358,994
- ESG-CARES - \$698,717

City of Turlock

- CDBG-CARES - \$386,829

This Strategic Plan and the subsequent 2020 Annual Action Plan will address the continued use of those initial CARES funds and how any additional funds aimed at responding to the COVID-19 outbreak will be used.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

The Stanislaus Urban County members will continue the use of State of California funds as they become available to fund affordable housing projects/programs. The Cities of Ceres, Newman, Patterson, Riverbank and Turlock are currently recipients of CalHOME funds to provide down payment assistance to first time home buyers and owner-occupied housing rehabilitation assistance. Stanislaus County will use CalHOME Program Income as match for any eligible housing programs.

CDBG, HOME, NSP, and CDBG-R Program Income (PI) funds will continue to be used by the Stanislaus Urban County to fund gaps in projects/programs. The Stanislaus Urban County will continue to use NSP Program Income to remove blighted properties via the Abandoned and Dangerous Buildings Program (ADB). City of Turlock will continue to use State HOME PI as an additional funding source for the first-time home buyer program. The Cities of Turlock, Ceres, Newman, Patterson, and Riverbank are currently recipients of CalHOME funds, which provide down payment assistance to first time home buyers and owner-occupied housing rehabilitation assistance. Stanislaus County will continue pursuing California State Water Resources Control Board (Water Board) grant funds to assist in the completion of CDBG-funded infrastructure projects.

Stanislaus County receives federal Entitlement and state Emergency Solutions Grant (ESG) Program funds that require a dollar to dollar match. The match requirements for this program are met through the County's ESG grantees' donations, in-kind, fund-raising, and other public and private funding. Stanislaus County will utilize CESH funds in the amount of \$1,576,186 during the next five years as match for the County's ESG programs.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

The City of Turlock Redevelopment Agency owns a parcel with a small office building. The building is currently leased for \$1.00 per year to Haven Women's Center. The intent of the five-year lease has been to bring much needed anti-domestic violence services to City of Turlock and overcome the transportation barrier of clients and families traveling the 15 miles to Modesto to get to much needed services.

The City of Turlock has also recently purchased a four-plex in one of the lowest income census tracts. The City of Turlock will be rehabilitating the four-plex and then selling the property to We Care, a local nonprofit that provides emergency shelter, case management, and transitional housing services so that We Care can add four units to its transitional housing program.

SP-40 Institutional Delivery Structure

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Stanislaus County	Government	-Economic Development -Homelessness -Non-homeless special needs -Rental -Public Infrastructure -Public services	Region
City of Turlock	Government	-Economic Development -Non-homeless special needs -Affordable Housing Homeownership/Rental -Neighborhood improvements -Public facilities -Public services	Region
City of Ceres	Government	-Economic Development -Non-homeless special needs -Neighborhood improvements	Jurisdiction
City of Hughson	Government	-Economic Development -Non-homeless special needs Neighborhood improvements	Jurisdiction
City of Newman	Government	-Economic Development -Non-homeless special needs -Neighborhood improvements	Jurisdiction
City of Oakdale	Government	-Economic Development -Non-homeless special needs -Neighborhood improvements	Jurisdiction
City of Patterson	Government	-Economic Development -Non-homeless special needs -Neighborhood improvements	Jurisdiction
City of Riverbank	Government	-Economic Development -Non-homeless special needs -Neighborhood improvements	Jurisdiction
City of Waterford	Government	-Economic Development -Non-homeless special needs -Neighborhood improvements	Jurisdiction

Stanislaus Regional Housing Authority	PHA	-Public Housing	Region
Stanislaus Community System of Care	Continuum of Care (CoC)	-Homelessness	Region

Assess of Strengths and Gaps in the Institutional Delivery System

Stanislaus County has a comprehensive planning and coordination system involving service providers and program operators at all levels (government, nonprofit, and private for-profit). The collaborative programming between Stanislaus County, cities, and nonprofits is identified as a key strength.

The collaborative efforts of the County and Turlock contribute to a regional approach of service delivery. Recognizing that many residents move about the region freely for social activities as well as employment and educational opportunities, this recognition is a key strength to the service delivery system. The Stanislaus System of Community Care, the local Continuum of Care (CoC) is a key part of this collaborative strength and as the CoC evolves its partnerships and knowledge of resources available throughout the County, all cities and unincorporated areas will benefit.

The primary gap is inadequate funding to meet the level of need. Funding gaps are most common for extremely low-income households, chronically homeless, homeless youth, and those living in transitional shelters. These funding gaps are either a lack of monetary resources to meet physical needs such as housing and food, or staffing needs for nonprofits to employ the needed number of capable staff to provide case management and other supportive services.

Availability of Services Targeted to Homeless Persons and Persons with HIV and Mainstream Services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X		X
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement		X	
Mobile Clinics	X		
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X		
Education	X		
Employment and Employment Training	X		

Healthcare	X	X	X
HIV/AIDS			X
Life Skills	X	X	X
Mental Health Counseling	X	X	
Transportation	X	X	

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

The County and Turlock are active partners in the CoC. The CoC continues to improve its Coordinated Entry System (CES), a key tool in addressing individualized needs of those persons experiencing homelessness. As indicated through consultations, the service delivery system is becoming increasingly effective in addressing the housing needs and those other supportive service needs for those experiencing homelessness, however as those with fewer needs get the support they need quickly, those individuals and families with high or difficult needs are more often slower to receive support.

The CoC and its partners strive to deliver individualized support to each person because it is more efficient and it minimizes the number of days a person may spend homeless and/or in a more vulnerable state. Each month the CoC gathers to discuss topics at-hand for two and a half hours, these meetings occur to share resources and knowledge, in an effort to better support the County and each City within.

The Coordinated Entry System (CES) Policies and Procedures Manual was updated in January 2020, and can be found at: <https://csocstan.com/coordinated-entry-system-ces-policies-and-procedures-manual/>.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

A strength in the service to special needs populations is similar to what is stated above; there is an increasing amount of communication and collaboration coming from the CoC and its partners. Many services and facilities provided serve the general population of homeless persons but there are also a number of programs that are targeted to meet the needs of special needs homeless such as persons with HIV/AIDS, veterans, youth, aging-out foster youth, women and children, and the mentally ill.

Although treatment for substance abuse disorders is available in the community, there are limited opportunities for persons who are actively using to be housed other than an overnight emergency shelter. The same holds true for those who live with a severe and chronic mental illness. Although there are services available and there is supportive housing (transitional and permanent), those with the most severe mental illnesses often do not have housing that is coupled with the level of care required. Such populations are often housed temporarily through short-term confinement or institutionalization as the result of arrest by law enforcement but struggle to find suitable permanent housing placements.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

Stanislaus County and Turlock will continue to work collaboratively with service and shelter providers to identify and address gaps in the service delivery system.

The County and Turlock continue to invest time and resources in the CoC and the strategy to address gaps moving forward is to identify those gaps within the structure of the CoC to reach a solution that will strengthen the entire CoC system and not one particular City or organization. The *Plan to Address Homelessness in Stanislaus County* was completed in January 2019 and outlines much of the strategies moving forward to a more complete and efficient system of care.

Stanislaus County SP-45 Goals

Goals Summary Information

#	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Public Infrastructure	2020	2024	Non-Housing Community Development	Stanislaus Urban County	Public Infrastructure Improvement	CDBG: \$8,008,895	7,500 Households
2	Provide Public Services	2020	2024	Non-Homeless Special Needs	Stanislaus Urban County	Public Services	CDBG: \$1,155,085	7,000 Persons
3	Work to End and Prevent Homelessness	2020	2024	Homeless	Stanislaus Urban County	Homeless Services Public Services	ESG: \$937,155	2,100 Persons
4	Community Emergency Response Program	2020	2024	Emergency Assistance	Stanislaus Urban County	Economic Development Public Services	CDBG: \$575,000	10 Households/Businesses
5	Affordable Housing	2020	2024	Affordable Housing	Stanislaus Urban County	Affordable Housing	HOME: \$6,500,000	40 Households

6	Administration	2020	2024	Administration	Stanislaus Urban County	Public Infrastructure Improvement Homeless Services Public Services Affordable Housing	CDBG: \$340,455	N/A
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Goal Descriptions

1	Goal Name	Improve Public Infrastructure
	Goal Description	Stanislaus Urban County will continue to work on infrastructure and facility projects in income-qualified residential neighborhoods who are lacking sewer, water, or stormwater systems, or where infrastructure exists but is in need of repair
2	Goal Name	Provide Public Services
	Goal Description	Projects and activities under this goal may support organizations that offer services such as educational programs, food boxes, and health care services.
3	Goal Name	Work to End and Prevent Homelessness
	Goal Description	Projects under this goal will support organization providing shelter and services for those individuals or families experiencing homelessness, including emergency shelters, transitional shelters, permanent supportive housing, and rapid re-housing.
4	Goal Name	Community Emergency Response Program
	Goal Description	Projects under this goal will support small businesses, Urban County members and agencies address community emergency needs as a result of pandemic related issues

5	Goal Name	Affordable Housing
	Goal Description	Housing improvements for those persons with disabilities and projects that may consist of rehabilitation or development of affordable housing units for either renters or homeowners.
6	Goal Name	Administration
	Goal Description	Administration for CDBG and ESG programs.

Turlock SP-45 Goals

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase and Improve Supply of Affordable Housing	2020	2024	Affordable Housing	HOME Consortium	Affordable Housing	CDBG:\$500,000 HOME: \$6,500,000	40 Households
2	Work to End and Prevent Homelessness	2020	2024	Homeless	City of Turlock	Homeless Services	CDBG:\$500,000 HOME:	2,000 Persons
3	Improve Infrastructure and Public Facilities	2020	2024	Non-Housing Community Development	City of Turlock	Public Infrastructure and Facility Improvement	CDBG:\$300,000 HOME:	1,500 Households
4	Provide Public Services	2020	2024	Non-Homeless Special Needs	City of Turlock	Public Services	CDBG: \$375,000	3,500 Persons

5	Administration	2020	2024	Administration	City of Turlock	Public Infrastructure Improvement	CDBG:	N/A
						Homeless Services	HOME:	
						Public Services		
						Affordable Housing		

Goal Descriptions

1	Goal Name	Increase and Improve Supply of Affordable Housing
	Goal Description	This goal will work to acquire real property and/or units in order for them to be used to increase the number of affordable housing units in Turlock. Projects under this goal will support both renter- and owner-occupied units in rehabilitation in the aim to increase the value and bring the housing unit up to code. The City will offer loans and grants to maintain single and multifamily affordable housing stock for low- and moderate-income households. Projects under this goal may also provide first-time homebuyer assistance.
2	Goal Name	Work to End and Prevent Homelessness
	Goal Description	Funding towards this goal will support organizations providing shelter and services for those experiencing homelessness; this goal may include emergency shelter, transitional, permanent supportive, and rapid re-housing services.
3	Goal Name	Improve Infrastructure and Public Facilities
	Goal Description	This goal may provide funding for projects that will improve sidewalks, streets, curbs, gutters, and sewers.

4	Goal Name	Provide Public Services
	Goal Description	This goal will address basic needs as well as provide important services to the community. Projects and activities under this goal may provide meals as congregate sites and home delivery to seniors, provide recreational services,
5	Goal Name	Administration
	Goal Description	Administration for CDBG and HOME programs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

- The Stanislaus Urban County is part of a HOME Consortia and funds are administered by the City of Turlock. Housing activities for the Stanislaus Urban County members are outlined in the City of Turlock Consolidated Plan and AAP. A summary of those expected HOME activities are: Rental unit rehabilitation (six households).
- First time Homebuyer Assistance (8 households).
- Provide loans and/or grants to low- or moderate-income households or to investors renting to low- or moderate-income tenants.

SP-50 Public Housing Accessibility and Involvement

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Stanislaus Regional Housing Authority (Housing Authority) is not under a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

The Housing Authority provides homeownership resources to participants in the Housing Choice Voucher Program. The Family Self-Sufficiency (FSS) Program has established partnerships with a variety of community resources to refer participants for services including pre- and post-secondary education, health care, childcare, employment development, supported employment, and small business development including micro-loans. The FSS Program also encourages families to participate in financial wellness programs including financial literacy and credit repair with an emphasis on long-term financial stability for the purposes of homeownership. Supportive services are provided through the Community Services Agency and the County's Department of Behavioral Health and Recovery Services

The Housing Authority previously implemented a services and communication "quality control" system that provides the Housing Authority with immediate customer feedback and identifies areas that may need improvement.

The Housing Authority has also implemented a resident education program with regularly scheduled meetings and written communications on agency policy, rules, and leases.

Efforts to improve communications with residents and program participants include on site resident training/informational meetings, regular newsletters and flyers.

The Housing Authority has implemented a "curb-side" appearance program. The focus of the program is the exterior of buildings, parking areas, playgrounds and other areas of the complexes. Rodent and insect problems are addressed when residents report a problem and/or on Annual Inspections. In an effort to better educate residents concerning these problems, information is regularly provided through the Housing Authority's resident newsletter.

These actions have assisted the Housing Authority in creating an atmosphere which emphasizes customer satisfaction and communication.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

SP-55 Strategic Plan Barriers to Affordable Housing

Barriers to Affordable Housing

The Stanislaus Urban County works with the City of Turlock, who is the lead agency for the City of Turlock/Stanislaus County HOME Consortium in efforts to provide affordable housing opportunities. One of the main barriers to affordable housing, both rental and homeownership, has been the supply of affordable housing units. For residents that are renting, the rents in the area have increased and made it difficult for renters to move or new renters to find housing units. In the area of homeownership, many residents are outpriced and cannot afford to purchase the homes that are available. Some of the barriers that impact the availability of affordable housing are outlined below.

Accessory Dwelling Units (ADUs)

Separate living quarters on a property (also called a “granny flat” or “guesthouse” can add additional housing units into single-family residential neighborhoods. Government regulations of ADUs can reduce or eliminate this housing development. Passage of numerous California legislative bills in 2017 and 2019 have eliminated many of the local impediments to the construction of ADU’s and all Urban County jurisdictions are working update their ordinance to comply with the State’s new ADU laws. In the interim state law prevails.

Shortage of Affordable Housing Funding

The availability of funding for affordable housing has dropped dramatically in the past decade for all jurisdictions in California that do not have local public or private housing funds. Dissolution of redevelopment agencies in the State of California in 2012, including the Modesto Redevelopment Agency, resulted in a significant drop in funding for housing projects.

Competition for tax credits and other State funding with cities in California and diminished amounts of HUD funding create a shortage of affordable housing.

Planning and Development Fees

Housing development imposes short- and long-term costs upon local government, such as the cost of providing site reviews, permitting and inspection, and maintaining General Plan and zoning regulations addressing housing development. Jurisdictions also charge impact fees to offset the cost of providing the infrastructure and public facilities that are required to serve new housing development. To help recoup costs and ensure that essential services and infrastructure are available when needed, Stanislaus County jurisdictions charge various types of development fees. The fee amounts vary based on the needs of each jurisdiction and the services provided.

The fees can be a significant factor in housing development throughout California, raising housing costs and disincentivizing new residential development, factors that contribute to statewide high housing costs. Among California jurisdictions, fees account for between six and eighteen percent of the price of housing. (Turner Center for Housing Innovation- UC Berkeley, It All Adds Up: The Cost of Housing Development Fees in Seven California Cities, March 2018)

As a best practice, the public and developers should be able to access a jurisdiction's current fee schedules to estimate fees as a part of total development project costs in advance.

Until 1978, property taxes were the primary revenue source for financing the construction of infrastructure and improvements for residential development in California. Proposition 13, passed in 1978, limited a local jurisdiction's ability to raise property taxes and increasing reliance on other funding sources to provide infrastructure, public improvements, and public services. An alternative funding source widely used among local governments in California is the development impact fee, which is charged to the project developers/owners, for publicly provided infrastructure that supports the development, including water and sewer facilities, parks, and transportation.

For jurisdictions to charge an impact fee, the California Mitigation Fee Act requires that the jurisdiction demonstrate the "nexus" between the type of development in question and the impact being mitigated by the proposed fee, and that fee amount be proportional to the impact caused by the development. Fees not covered by the California Mitigation Fee Act include inclusionary housing ordinance in-lieu fees, permit processing fees, utility connection fees, and fees included within specific development agreements between a jurisdiction and a developer.

Despite state law limiting direct impact fees, the fees can be a large part of a jurisdiction's total fee requirements for housing development. Because developers tend to pass these fees onto the final housing owner, the effects of reducing these fees on housing affordability depend on the amount of the fee reduction and current home prices. Because the eventual owner bears the brunt of fees, high fees limit development of lower-cost housing more than higher-cost housing. (Turner Center for Housing Innovation- UC Berkeley, Current Practices and Policy Considerations to Improve Implementation of Fees Governed by the Mitigation Fee Act, August 2019)

A reduction in development fees for low-income housing may help these projects become financially feasible. A jurisdiction deferring development fees until a certain time after project completion can also help add flexibility the project's upfront costs and assist in the development of low-income housing.

Municipal Processing Time

The processing time required to obtain full approval of a development project is often cited as a contributing factor to the high cost of housing in the State of California. Review and legislative approval, while often necessary steps in the development process, add to the cost of construction by increasing land holding costs and interest payments. Governments are not always able to control delays when multiple levels of government that must communicate, review, and approve plans, delays due to the schedule or timing of legislative boards of approval, or delays based on the amount of municipal staff capacity to review plans when demand for services is high.

Prevailing Wages

Davis-Bacon prevailing wage must be paid to laborers when federal Community Development Block Grant (CDBG) dollars are used to pay for any construction project over \$2,000 or on any multifamily housing project over eight units. Prevailing wage must also be paid on any HOME-funded multifamily housing project that directly funds twelve or more units. While competitive wages are currently high, Davis-Bacon wages may be higher and add additional cost to housing construction and rehabilitation activities.

California's Prevailing Wage Law requires contractors to pay minimum wage rates on public works projects that support housing construction such as roads, water and sewer projects, and other public utilities. The rates are set by the California Department of Industrial Relations. These additional costs could add to local costs for housing development.

Expiration of Affordability Contracts

Affordability contracts with private property owners have a time limit that runs out after a contractually-set number of years. Unless the affordability contracts are renewed with the property owner, the affordable rental housing units will expire and become market-rate housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The Stanislaus Urban County and City of Turlock strive to consistently review local development standards and development review procedures to ensure that such do not have unintended negative consequences, and to improve policies and procedures to increase the feasibility of developing affordable housing.

The Regional Analysis of Impediments to Fair Housing Choice (AI) includes both the County and Turlock, as well as Modesto, and the AI will work to identify those policies and strategies that have directly negative impacts or indirect negative impacts on low-income households throughout the County. The AI will also outline actions to be taken to best address those policies and strategies to remove barriers and create a more equitable housing market for those low- and moderate-income households.

Layers of federal and state requirements may limit cost, size, design, return, and subsidies. Such constraints are designed to ensure the proper use of limited public resources. However, they also force developers to be driven by the requirements of the funding sources rather than the needs of the community or the residents who will live in the housing. These requirements often demand that housing be narrowly defined as "low-income" or "elderly" or "congregate" housing, resulting in concentration of assisted housing. As stated above, the County and the City of Turlock consistently review local policies and strategies to mitigate unintended consequences that may negatively impact low- and moderate-income households.

The strategy of the Stanislaus Urban County and City of Turlock will be to continue ongoing efforts to review all potential barriers to affordable housing that are within their authority to address; to continue to pursue and utilize available funding for mortgage assistance and housing rehabilitation; and to continue to work with and partner with housing nonprofit agencies, and housing developers from the nonprofit and for-profit sectors to promote the development of affordable and special-needs housing.

SP-60 Homelessness Strategy

Describe how the jurisdiction's strategic plan goals contribute to:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

In January 2019, the CoC approved the *Plan to Address Homelessness in Stanislaus County*³ which is a comprehensive report regarding homelessness throughout the County. The report takes stock of the services, shelters, and programs already available, then moves to outline gaps and strategies to overcome those gaps. The report is summarized in the following responses, please see the link in the footnote below to see the entire report.

The County and Turlock participate in the CoC and are part of the planning of services from outreach to housing placement and service provision. The *Plan to Address Homelessness in Stanislaus County* identify the organizations and programs that conduct outreach and engagement throughout the County. Across the CoC there is a particular focus on identifying and engaging individuals who may not otherwise seek or obtain services.

Below are the programs highlighted as those who engage individuals and families where they are in outreach efforts:

Stanislaus Homeless Outreach Program (SHOP)

SHOP provides culturally competent mental health services to individuals with SMI and a history of homelessness or have mental health and co-occurring issues of mental health and substance abuse. Clients may be uninsured or underinsured and involved with other agencies. The program goals are to reduce the risk for emergency room use, contract with law enforcement, homelessness, and psychiatric hospitalization for Transitional Age Youth (TAY) ages 18 to 24, adults 26-59, and older adults 60+ with a serious mental illness or co-occurring substance use. Within SHOP, there are five Full Service Partnership (FSP) teams serving different populations and three levels of care that include an FSP using the ACT Model, intensive services support, and wellness/recovery. Funding for SHOP is provided under the Community Services and Supports (CSS) category of County MHA funding. In FY 2016-2017, 85% of surveyed individuals indicated decreased stigma, increased self-care, increased access to community resources, and a decreased need for extensive and expensive services.

Central Star Youth with Serious Emotional Disorder

This program is a Full-Service Partnership (FSP) that provides behavioral health services, including outreach and engagement, to high-risk children and youth with serious emotional disturbances (SED) and their families. This FSP provides 24/7 crisis response, outreach and engagement, and on-site intensive mental health services. Since its initial launch in March of 2017, the program has served 23, exceeding its 15-client target, with 83% of discharged individuals meeting goals or transitioning to a lower level of care.

³ <https://stancares.wpcomstaging.com/wp-content/uploads/2019/01/Plan-to-Address-Homelessness-in-Stanislaus-County.pdf>

Garden Gate Respite

A residential based respite program that targets TAY, adults, and older adults from diverse and/or underserved populations who are either known or suspected to experience mental illness, and are either homeless or at risk of homelessness, incarceration victimization, and/or psychiatric hospitalization. GGR provides crisis intervention and basic needs such as food, clothing, shelter, individual needs assessment to facilitate targeted crisis intervention case management and support services and linkage to outreach and engagement services. In FY 2016-2017, 86% of clients surveyed indicated that they deal more effectively with daily problems as a result of services. Through stakeholder and client feedback, gaps in services for respite care for families, effective collaboration with the County's new Outreach and Engagement Center, and low-barrier shelters that allow pets were identified as challenges that were incorporated into this plan.

Outreach and Engagement Center (OEC)

The Outreach and Engagement Center (OEC) coordinates the provision of multiple services throughout the County for those experiencing homelessness. Teams from OEC go out 5 days a week to connect people directly with benefits and services to engage those who may otherwise not seek assistance. The OEC also serves as a physical entry point for support through assessments and referrals and is open for walk-in access Monday through Friday.

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Any funding provided for such services through the ESG program would be subject to the competitive grant award process.

Addressing the emergency and transitional housing needs of homeless persons.

The needs of those individuals in emergency and transitional shelter situations are met by service providers within the CoC. The CoC has steadily increased its effectiveness over the past several years and will continue to work together to meet the needs of all individuals and families needing services along the spectrum of assistance provided by the CoC and its partners.

The Coordinated Entry System (CES) is an important tool utilized by the CoC in its effort to customize care and use resources in the most efficient manner. Matching an individual/family with the correct housing option, whether it be emergency shelter, transitional shelter, or permanent supportive housing, is an important component of addressing the follow-up needs a person has. Upon entering an emergency shelter or transitional shelter, the CoC partners work to provide the services that will best match the needs of the individual or household.

Short-term strategies for addressing the emergency and transitional housing needs of homeless persons include but are not limited to the following:

- Continue to support and work with those organizations tasked with outreach and engagement, ensuring the coordinated entry system is fully being utilized when possible.

- Sustaining existing emergency shelter and transitional housing inventory and helping those in shelters exit to permanent housing through rental assistance combined with wrap-around services that assist clients in developing life skills and reduces barriers to retaining housing.

Long-term strategies include but are not limited to the following:

- Expanding economic stability programming such as job training and vocational opportunities to help participants achieve long-term stability and reduce recidivism.
- Increasing inventory of permanent supportive housing for homeless households through the development of affordable housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Key to stabilizing housing for these homeless populations is the provision of supportive services, tailored to fit the needs of the individual. These efforts are coordinated through the CoC, the CES, and services providers throughout the County.

Permanent housing destinations for those who were recently homeless generally include an apartment, permanent supportive housing, or living permanently with friends or family. The CES is a powerful tool here in tracking individuals across the system, being able to adjust services and engagement strategies as needed on a case-by-case basis. A return to homelessness is indicated by a new entry in a homeless residential program (emergency shelter, transitional housing, rapid re-housing) in HMIS within 365 days after exiting to permanent housing.

The Stanislaus CoC strategies encourage providing homeless households with housing quickly and with supportive services that are of greatest need to support stable housing; other needs the households may have are addressed through referrals to existing mainstream resources available in the community.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies.

The state has policies in place that require health care facilities to participate in regional planning meetings and develop a specific document to identify best practices for the post-hospital transition of homeless patients. Local health care facilities have specific protocol in place requiring a safe discharge for all

patients. The County's Health Services Agency is actively involved in the Stanislaus CoC. Currently in place there are discharge planning social workers on staff at the hospitals who work with service providers to locate appropriate housing.

Representatives from Behavioral Health and Recovery Services (BHRS) and the Community Services Agency (CSA) are also active participants in discharge coordination planning.

For adults recently released from custody, Stanislaus County addresses housing issues through the Day Reporting Center (DRC). The Sheriff's Department conducts Probation Orientation Meetings at the DRC. The Stanislaus County Sheriff's and Probation Departments also began a diversion program, where homeless individuals who would otherwise be jailed for minor crimes are able to stay at the Salvation Army shelter facility, where they receive shelter and case management services.

Stanislaus County has transitional living procedures in place for juveniles exiting foster care to address youth in placement where the long-term plan is emancipation. Stanislaus County develops a 90-day transition plan that includes a housing component. A status review is a court hearing to review the minor's status in placement. The plans are submitted to the court and all involved parties, including the minor.

Through contracted services with BHRS, Telecare SHOP (Stanislaus County's primary agency for outreach to CH/mentally ill persons) provides treatment and discharge planning to adults with mental illness and/or chemical addiction. Discharge planning is multi-disciplinary and starts upon admission to a facility. Discharge planning includes supportive or protective housing if the patient is incapable of independent living. Agencies receive diagnosis, medication and other pertinent information to assist with follow up services. Appropriate discharge settings include nursing homes, basic care facilities, adult foster care, and independent living which are not funded through HUD McKinney-Vento resources. SHOP assists individuals in completing application for housing and mainstream resources such as Social Security prior to the patients discharge.

SP-65 Lead-based Paint Hazards

Actions to address LBP hazards and increase access to housing without LBP hazards.

All housing related program funding administered by the Stanislaus Urban County and the City of Turlock, including Rapid Re-Housing, NSP and HOME Consortia projects, require that all units constructed before 1978 be screened and inspected for lead-based paint hazards. HOME Consortia projects are generally inspected by the Housing Authority and ESG Rapid Re-Housing units are inspected by Stanislaus County Building Inspectors, unless the Housing Authority has already conducted a Lead Based Paint inspection. The lead-based paint regulation that became effective April 22, 2010 added a requirement that requires contractors bidding on the rehabilitation of homes built prior to 1978 provide documentation of EPA Lead Renovation and Repair and Painting certification. If lead is found in any housing unit, a lead-based paint clearance test is conducted, after the work has been completed, by a licensed contractor with expertise in this type of work. Final payment is not released until the unit has passed the lead-based paint testing requirements. These requirements will assist Stanislaus County in its goal to eliminate the lead-based hazards.

How are the actions listed above integrated into housing policies and procedures?

All housing-related programs administered by the Stanislaus Urban County, including Rapid Re-Housing and HOME Consortia project who collaborate with the Housing Authority, have policies in place which require that all units constructed before 1978 be screened for LBP hazards.

SP-70 Anti-Poverty Strategy

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Turlock HOME Consortium, and Stanislaus Urban County work to reduce poverty through ensuring an adequate, affordable, quality housing supply, improving low-income neighborhoods, strengthening the employment skills of the community and ensuring access to basic needs such as food and shelter. The City of Turlock is particularly focused on ensuring quality housing options to low-income individuals through the production of new low-income units as well as the rehabilitation of existing low-income units and combating rental discrimination against minorities.

The City of Turlock and the Stanislaus Urban County updated the Analysis to Impediments to Fair Housing Choice (AI) alongside the development of this Consolidated Plan and outlined ways in which each jurisdiction can take actions to ensure protected classes have equitable access to quality schools and employers. The AI investigates zoning codes, permit processes, and fees to ensure the County and each City within are as accommodating as possible to those developments and employers that will contribute to reducing poverty and increasing economic opportunity and housing stability.

The City of Turlock realizes that it cannot combat poverty alone, and it is a top priority of the City of Turlock to coordinate with other entities when possible. The City of Turlock is particularly committed to coordinating with Stanislaus County which manages many housing and social service programs. The City of Turlock also coordinates with other entities such as the CoC and various community-oriented nonprofit groups that have a stake in the community. It is a top goal of the City of Turlock to ensure that it accesses all available grant money to assist the community.

The CoC has developed into a more coordinated organization over the past five years, and the City of Turlock as well as the County will continue to leverage those partnerships and resources to address the issues of poverty.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The goals and priority needs outlined in this section all work with the City of Turlock's programs and policies as well as the County's in order to support low-income families so they may direct their own resources in ways that may improve their economic situation. Through the projects and activities that will be associated with this Consolidated Plan, the Turlock HOME Consortium will work with partners to relieve financial pressures on low-income households, with the long-term goal of lifting those households out of poverty. This is true both for those households experiencing homelessness and those households that are low-income homeowners and all types of households between.

By continuing to fund the acquisition, development, and/or rehabilitation of affordable housing units when funding resources are available, the Stanislaus Urban County and City of Turlock will be providing individuals and families in poverty with a decent, affordable place to live, which will allow them to focus their efforts on other opportunities that may offer further stability to the household. Providing financial assistance to first-time homebuyers can help them in making the transition to homeowner status and build up equity in their own home, generating longer term wealth and stability. Similarly, assisting a low-income family which already owns their home to rehabilitate or improve that home increases its value, thus increasing the value of that family's home.

While the ability to achieve equity in a home is limited for extended periods of time under most housing assistance programs, a valuable credit history can be created which increases a family's access to borrowed money. In addition, the eventual termination of restrictions permits direct access to accumulated equity at some point in the future.

SP-80 Monitoring

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

Stanislaus County

Stanislaus County monitors all sub-recipients on a regular basis, a minimum of 2 on site visits and desk audits as needed. Monitoring is conducted to ensure statutory, regulatory, and programmatic requirements are being met and that information submitted to Stanislaus County is accurate and complete.

An agreement is executed with every sub-recipient which clearly states all contractual requirements including but not limited to the project scope of work, performance measurement standards, reporting requirements, drawdown requirements, and applicable federal requirements. The monitoring process emphasizes on-site field visits, desk audits, technical assistance, and assistance to sub-recipients to ensure a good data collection and reporting system is in place.

Stanislaus County staff reviews quarterly project progress reports, requests for funds forms and related back up documentation which identify the total funds used by all jurisdictions during a given month. Stanislaus County staff verifies and cross-references the information on the quarterly budget activity reports. Monitoring visits are also scheduled throughout the year by Stanislaus County staff for each sub-recipient to ensure appropriate expenditure of funds. Finally, Stanislaus County tracks the timeliness of drawdowns within the IDIS system to assure that the program meets or exceeds the threshold requirements established by HUD.

Stanislaus County staff reviews quarterly public services grantee statistics tables, narratives, request for funds forms, and budget printouts which identify the total funds used/requested by each grantee during that reporting period. Stanislaus County staff verifies and cross-references the information on the quarterly budget activity reports. Monitoring visits are also scheduled throughout the year by Stanislaus

County staff for each grantee to ensure appropriate expenditure of funds and recommendations are provided to the sub-grantee within 30 days of the monitoring visit.

Turlock

CDBG Monitoring

City staff assess risk of CDBG sub-recipients according to different risk factors to determine extent of monitoring for any given CDBG activity.

Desk audits consist of:

- monthly review of project files
- performance reports
- invoices and supporting documentation
- ensuring timely expenditure
- tracking progress toward Consolidated Plan/Annual Action Plan goals

For those sub-recipients that are deemed high-risk, all CDBG activities are monitored more extensively and typically on-site.

The City and the County uses “Appendix 5-21” of Managing CDBG: A Guidebook for CDBG Grantees on Sub-recipient Oversight for the basic structure of its CDBG/ESG monitoring and specific HUD-developed monitoring protocols according to activity/CPD program (CPD Monitoring Handbook 6509.2).

HOME Monitoring

In accordance with 24 CFR, Section 92.252, HOME-assisted rental units are monitored and inspected for income certifications, housing quality standards, and other affordability criteria. There are different levels of monitoring that staff follow, beginning at project predevelopment and continuing through the period of affordability. Staff reviews each draw request. Staff meet with the developers to provide technical assistance if needed and make periodic site visits to follow up on project progress. In addition, staff are constantly monitoring to see if the projects are meeting the standards established in the initial agreement, if costs are on target, and to check on quality of construction.

For rental housing, during the period of affordability, staff conducts on-site inspections of units to determine compliance with property standard requirements. Staff corroborates information furnished by the owners in regard to lease, income verification, rent, utility allowances and compliance with provisions of written agreements. In addition, City staff performs on-site inspections of HOME-assisted units as required.

HOME-assisted rental units are inspected for rent, income, housing quality, and other affordability criteria in accordance with HOME requirements. Physical inspections are conducted to ensure that properties provide decent, safe and sanitary housing for all residents. In addition, all property management agents at each complex are expected to maintain physical conditions above the minimum maintenance standards as required by Section 8 Housing Quality Standards and local housing codes.

For CHDOs staff follows the same process as described above. Staff reviews payments requests, invoices and each draw request. Staff meets with the CHDOs to provide technical assistance if needed and make periodic site visits to follow up on project progress. In addition, staff are constantly monitoring to see if the projects are meeting the standards established in the initial agreement, if costs are on target, and to check on quality of construction. For the past two years staff has been meeting in a monthly basis with the two City approved CHDOs.

ATTACHMENT 3



STANISLAUS URBAN COUNTY

Annual Action Plan Fiscal Year 2020-2021 *for HUD Programs*

May 12, 2020

This Annual Action Plan includes contingency provision language to explain how project/program funding amounts will be adjusted once actual funding is made available by the U.S. Department of Housing and Urban Development

This is the final draft version of the "Annual Action Plan Fiscal Year 2020-2021 for HUD Programs". New wording is indicated in bold font and deleted wording is indicated in strikethrough font.*

**Note: Bold and strikethrough text was not used for administrative cleanup.*

Stanislaus County – Board of Supervisors

District 1 Kristin Olsen, Chairwoman
District 2 Vito Chiesa, Vice Chairman
District 3 Terry Withrow
District 4 Tom Berryhill
District 5 Jim DeMartini



City of Ceres – City Council

Mayor Chris Vierra
Vice-Mayor Linda Ryno
Councilmember Bret Durossette
Councilmember Mike Kline
Councilmember Channce Condit



City of Hughson – City Council

Mayor Jeramy Young
Mayor Pro-Tem George Carr
Councilmember Harold Hill
Councilmember Michael Buck
Councilmember Ramon Bawanan



City of Newman – City Council

Mayor Robert Martina
Councilmember Murray Day
Councilmember Nicholas Candea
Councilmember Casey Graham
Councilmember Laroy McDonald



City of Oakdale – City Council

Mayor J.R. McCarty
Councilmember Christopher Smith
Councilmember Ericka Chiara
Councilmember Cherilyn Bairos
Councilmember Richard Murdoch



City of Patterson – City Council

Mayor Deborah M. Novelli
Councilmember Dominic Farinha
Councilmember Joshua Naranjo
Councilmember Dennis McCord
Councilmember Cynthia Homen



City of Riverbank – City Council

Mayor Richard D. O'Brien
Vice-Mayor (Councilmember) Darlene Barber-Martinez
Councilmember Luis Uribe
Councilmember Cindy Fosi
Councilmember Cal Campbell



City of Waterford – City Council

Mayor Michael Van Winkle
Vice-Mayor Jose Aldaco
Councilmember Thomas Powell
Councilmember Elizabeth Talbott
Councilmember Joseph Ewing, III



Annual Action Plan

Fiscal Year 2020-2021

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Annual Action Plan

AP-15 Expected Resources

Introduction

Stanislaus Urban County

During Fiscal Year 2020-2021, Stanislaus Urban County expects to receive \$2,310,165 in Community Development Block Grant (CDBG) program funding and \$202,628 in ESG funding. CDBG program income consists of approximately \$200.00 a month unless there's a significant payoff from an existing loan, which will be spent down prior to Fiscal Year 2020-2021 program funds. The amount of prior years' unspent funds is approximately \$4,348,275 in federal CDBG and \$186,249 in federal ESG funds. An estimated \$270,601 in state ESG funding has been allocated by the California Department of Housing and Community Development (HCD) for Fiscal Year 2020-2021 and a carry-over of \$289,501 from Fiscal Year 2018-2019 funds has been obligated to service providers. Stanislaus County also currently has a balance of \$394,739 in NSP 1 and \$717,190 in NSP 3 program income funding. This funding is anticipated to be utilized during Fiscal Year 2020-2021 for primarily housing development activities and includes the Abandoned and Dangerous Buildings program.

Anticipated Resources

Stanislaus Urban County

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition, Admin and Planning, Economic Development, Housing, Public	\$2,310,165	0	0	\$2,310,165	\$9,240,000	Majority of funds will be utilized for infrastructure projects. 10-15% will be set aside for public services. 20% for Administration. Prior year resources are projected to be \$4 million that will be

		Infrastructure, and Public Services						reallocated to HUD approved infrastructure projects
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$202,628	0	0	\$202,628	\$1,013,140	Funds will be utilized for ESG program administration, emergency shelters, homeless management information system (HMIS) data entry, and homeless prevention and rapid re-housing services.

It is important to understand that during the development of this Consolidated Plan, the County and all Urban County Cities were put in a position to react to the unique Coronavirus, COVID-19, outbreak. In April 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act (CARES). The CARES allocated CDBG and ESG funds to entitlement grantees to be used to respond the varied impacts of the COVID-19 outbreak. Stanislaus Urban County received CDGB and ESG CARES funds, to be programmed under the 2019 Annual Action Plan in the following amounts:

Stanislaus Urban County

- CDBG-CARES - \$1,358,994
- ESG-CARES - \$698,717

This 2020 Annual Action Plan will address the continued use of those initial CARES funds and how any additional funds aimed at responding to the COVID-19 outbreak will be used.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

HOME Program - 25% Match Requirement: The Stanislaus Urban County uses local Inclusionary Funds, state funds, and program income from various funding sources as contributions to housing pursuant to HOME matching requirements.

ESG Program - 100% Match Requirement: The Stanislaus Urban County and its sub-recipients utilize CDBG, CoC funding, private donations, foundation funding and in-kind as sources to meet the program match requirement. Fiscal Year 2019-2020 ESG (federal and state) allocations are expected to leverage an estimated \$303,461 from the following sources: Private donations, federal, State and other local funding.

NSP Program - The Stanislaus Urban County will continue its efforts in using NSP Program Income (PI) funds to provide affordable housing opportunities in combination with leveraged funding provided by the housing developer.

CDBG Program - Public Services Grants (CDBG-PSG): Leverage funding identified by applicant agencies awarded funding during the Fiscal Year 2020-2021 NOFA CDBG Public Services Grant Program process amounts to \$1,385,260.

Stanislaus Urban County members will continue the use of State of California funds (as they become available) designed to fund affordable housing and infrastructure projects. Stanislaus County will continue pursuing California State Water Resources Control Board (Water Board) grant funds to assist in the completion of CDBG funded sewer infrastructure projects.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

In partnership with the Housing Authority, the Stanislaus Urban County is in the process of developing the Oak Leaf Meadows project consists of 56 multi-family affordable housing units, two and three-bedroom units, on a 3.29+/- acre property that includes a 5,000 square foot community center and a day care/head start facility in the City of Oakdale. Construction began in May 2019 and is scheduled for completion by June 2021. The Oak Leaf Meadows project is being developed on one of four properties NSP acquired properties. The other three properties have also been developed in partnership with the Housing Authority to provide in-fill housing development consisting of single- family housing units, with the last of the units completed in 2019. All of the units will be made available as rentals to income eligible households and the units will be managed by the Housing Authority. During 2019, no additional foreclosed homes and/or properties were acquired or developed using NSP funding. The remaining inventory of property purchased with NSP funds are held by the Housing Authority as rentals or being developed for rentals, as outlined above. The Housing Authority will manage these housing units for 55 years.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Infrastructure and Public Facilities	2020	2024	Non-Housing Community Development	Public Infrastructure Improvement	CDBG: \$1,601,779	1,500 Households
2	Provide Public Services	2020	2024	Non-Homeless Special Needs	Public Services	CDBG: \$231,017	1,400 Persons
3	Work to End and Prevent Homelessness	2020	2024	Homeless	Homeless Services Public Services	ESG: \$187,431	420 Persons
4	Affordable Housing	2020	2024	Affordable Housing	Affordable Housing	HOME:\$210,000	10 Households
5	Community Emergency Response Program	2020	2024	Emergency Assistance	Economic Development Public Services	CDBG: \$115,000	50 Households/Businesses

6	Administration	2020	2024	Administration	Public Infrastructure Improvement Homeless Services Public Services Affordable Housing	CDBG: \$340,455 ESG: \$15,197	Other: 1
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Goal Descriptions

1	Goal Name	Improve Infrastructure
	Goal Description	Stanislaus Urban County will continue to work on infrastructure and facility projects in income-qualified residential neighborhoods lacking sewer, water, or stormwater systems, or where infrastructure exists but is in need of repair.
2	Goal Name	Provide Public Services
	Goal Description	Projects and activities under this goal may support organizations that offer services such as educational programs, food boxes, health care services, and economic development.
3	Goal Name	Work to End and Prevent Homelessness
	Goal Description	Projects under this goal will support organization providing shelter and services for those individuals or families experiencing homelessness, including emergency shelters, transitional shelters, permanent supportive housing, and rapid re-housing.
4	Goal Name	Affordable Housing
	Goal Description	Housing improvements for those persons with disabilities and projects that may consist of rehabilitation or development of affordable housing units for either renters or homeowners.

5	Goal Name	Community Emergency Response Program
	Goal Description	Projects under this goal will support small businesses, Urban County members, residents and agencies address community emergency needs as a result of Coronavirus pandemic related issues.
6	Goal Name	Administration
	Goal Description	Administration for CDBG and ESG programs.

AP-35 Projects

Introduction

As shown in the previous section, AP-20 Annual Goals and Objectives, the Stanislaus Urban County has identified goals to address housing and community development needs for Fiscal Year 2020-2021. During this year, the Urban County, along with the City of Turlock, as the lead entity of the HOME Consortium will work towards achieving all of the goals outlined above. Below are the proposed projects funded with FY 2020-2021 federal funding from the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG).

Stanislaus Urban County

#	Project Name
1.	Stanislaus County - CDBG Program Administration FY 20-21
2.	Stanislaus County - West Modesto Sewer Infrastructure Project FY 20-21
3.	Stanislaus County - Fair Housing and Tenant/Landlord Services Sidewalk Improvements Project FY 20-21
4.	Stanislaus County - Fair Housing and Tenant/Landlord Services FY 20-21
45.	City of Ceres - CDBG Project Administration FY 20-21
56.	City of Ceres - Morrow Village ADA Improvements (4 Phases) FY 20-21
67.	City of Hughson - CDBG Project Administration FY 20-21
78.	City of Hughson – Walker Lane Infrastructure Project FY 20-21
89.	City of Newman - CDBG Project Administration FY 20-21
910.	City of Newman - Hill Park Area Improvement Project FY 20-21
1011.	City of Newman - Steffensen/Sunshine Park Area Improvement Project FY 20-21
1112.	City of Oakdale - CDBG Project Administration FY 20-21
1213.	City of Oakdale - Wood Basin Area Storm Drain Improvements Project FY 20-21
1314.	City of Patterson - CDBG Project Administration FY 20-21
1415.	City of Patterson - C & D Street Washburn Infrastructure Improvements Project FY 20-21
1516.	City of Riverbank - CDBG Project Administration FY 20-21
1617.	City of Riverbank - Castleberg Park Trail Project FY 20-21
1718.	City of Riverbank - Castleberg Park ADA Improvements Project FY 20-21
1819.	City of Riverbank - Pioneer Park ADA Improvements Project FY 20-21
1920.	City of Waterford - CDBG Project Administration FY 20-21

2021.	City of Waterford - Main Street Infrastructure Project FY 20-21
2122.	Court Appointed Special Advocates (CASA) of Stanislaus County - Direct Services Project FY 20-21 (CDBG-PSG)
2223.	Center for Human Services - Ceres Partnership-Concrete Support in Times of Need FY 20-21 (CDBG-PSG)
2324.	Center for Human Services - Oakdale Family Resource Center- Crisis Support Program FY 20-21 (CDBG-PSG)
2425.	Center for Human Services - Westside Family Resource Centers-Supportive Services FY 20-21 (CDBG-PSG)
2526.	Children's Crisis Center – Single Parent Intervention Services @ Guardian House FY 20-21 (CDBG-PSG)
2627.	Children's Crisis Center – Single Parent Intervention Services @ Marsha's House FY 20-21 (CDBG-PSG)
2728.	Children's Crisis Center – Single Parent Intervention Services @ Verda's House FY 20-21 CDBG-PSG)
2829.	The Salvation Army Red Shield – At Risk Teen Program FY 20-21 (CDBG-PSG)
2930.	United Samaritans Foundation – Daily Bread Mobile Lunch Program-Westside FY 20-21 (CDBG-PSG)
3031.	United Samaritans Foundation – Daily Bread Mobile Lunch Program-Hughson FY 20-21 (CDBG-PSG)
3132.	Stanislaus County – Small Business Assistance Program- FY 20-21 (CDBG-PSG)
33.	Stanislaus County – Community Emergency Response Program- FY20-21 (CDBG-CARES)
3234.	Stanislaus County – Emergency Solutions Grants (ESG) Program FY 20-21 (ESG)

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

There are three specific HUD goals for the CDBG program. They are:

- Provide decent housing
- Provide a suitable living environment
- Expand economic opportunities

The Priority Needs section within the Fiscal Year 2020-2025 Consolidated Plan identifies the key priority needs in both the Urban County and the City of Turlock. These priority needs are reflected in the projects identified above. More specifically, the needs expressed by data in the Needs Assessment and Market Analysis are taken into account when considering projects to allocate resources to.

Obstacles in addressing underserved needs are:

- A lack of available funds and resources
- The constraints and restrictions of the funding programs requirements

AP-38 Project Summary

Project Summary Information

Stanislaus Urban County

1. PROJECT NAME: Stanislaus County- CDBG Program Administration FY 20-21
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Target Area(s): Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford and Unincorporated Stanislaus County

Goals Supported: Improve Infrastructure and Public Facilities
 Provide Public Services
 Work to End and Prevent Homelessness
 Affordable Housing
 Administration
 Community Emergency Response Program

Needs Addressed: Public Infrastructure and Facility Improvement
 Affordable Housing
 Community and Economic Development
 Public Services
 Homeless Services

Funding: CDBG: \$340,455

Description: Stanislaus County will provide management and administration services to the Stanislaus Urban County program members. The funds will cover the costs of salary, publications, public notices, and other eligible costs directly related to the program. These funds will also cover administration costs incurred from administering the ESG program (costs incurred in excess of ESG administration funds).

National Objective: N/A

Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 1010 10th Street, Suite 3400, Modesto, CA 95354

Planned Activities: Administration of CDBG and ESG programs and projects for FY 20-21.

2. PROJECT NAME: Stanislaus County- West Modesto Sewer Infrastructure Project FY 20-21

Target Area(s): Unincorporated Stanislaus County

Goals Supported: Improve Infrastructure and Public Facilities

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$338,928

Description: This project will install sanitary sewer mains and laterals in three separate unincorporated neighborhoods within West Modesto in Stanislaus County. It is estimated that the project will include the installation of up to 80,000 linear feet of gravity mains and approximately 1,004 new house laterals in the Spencer/Marshall (144 services), Beverly/Waverly (527 services), and Rouse/Colorado (333 services) neighborhoods. The Spencer/Marshall neighborhood is generally located approximately 0.3 mile west of Highway 99 and is accessible from State Route 132 and Spencer Ave. The Beverly/Waverly neighborhood is located approximately 0.9 mile west of Highway 99 and is accessible from Paradise Road. The Rouse/Colorado neighborhood is located approximately 0.6 mile west of Highway 99 and is accessible from Tuolumne Boulevard and Roselawn Ave. The project may include target areas for sidewalks pending available funding and environmental review.

The targeted neighborhoods are disadvantaged communities located in West Modesto with predominantly residential parcels that currently rely on septic tanks for the treatment of sewage. The project is proposed in response to health and safety concerns associated with failing septic systems which could lead to the degradation of groundwater quality. The completed project will allow property owners to abandon their existing septic tanks and connect to the public sewer system. The new sewer infrastructure will connect into the City of Modesto's existing public sewer system. Upon completion of the project, infrastructure ownership will be transferred to the City of Modesto for operation and maintenance.

National Objective: LMA

Matrix Code: 03J

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of unincorporated West Modesto.

Performance Outcomes:

Number of households with access to infrastructure improvements: 1,004

Number of residents impacted by infrastructure improvement: 3000

Target Date: 6/30/2025

Estimate the number and type of families that will benefit from the proposed activities: 1,004 households/ 3,000 individuals

Location Description: 1010 10th Street, Suite #3400, Modesto, CA 95354

Planned Activities: FY 20-21 Activities include design, engineering, and construction of sewer infrastructure and other related infrastructure improvements to the West Modesto Neighborhoods of:

Spencer/Marshall- proposed boundary area includes: Maze Blvd., Spencer Ave., California Ave., Briggs Ditch, and Spruce St. (1 Activity/Phase)
Beverly/Waverly- proposed boundary area includes: proposed boundary area includes: Chicago Ave., Ellen Ave., Paradise Rd., Ritsch Ln., Wade Ave., and Ohio Ave., (2 Activities/Phases)
Rouse/Colorado- proposed boundary area includes: between Sutter Ave. and Sunset Ave., south of South Ave. and north of Garden Ave. (2 Activities/Phases)

3. PROJECT NAME: Stanislaus County- Sidewalk Improvements Project FY 20-21

Target Area(s): Unincorporated Stanislaus County

Goals Supported: Improve Infrastructure and Public Facilities

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: TBD

Description: The project consists of sidewalk, curbs, and gutter improvements in CDBG eligible residential target areas in the unincorporated areas of the County.

National Objective: LMA

Matrix Code: 03J

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of unincorporated County communities.

Performance Outcomes:

Number of households with access to infrastructure improvements: 2,000

Number of residents impacted by infrastructure improvement: 6,500

Target Date: 6/30/2025

Estimate the number and type of families that will benefit from the proposed activities: 2,000 households/ 6,500 individuals

Location Description: 1010 10th Street, Suite #3400, Modesto, CA 95354

Planned Activities: Sidewalk and other related public infrastructure improvements

3.4. PROJECT NAME: Stanislaus County- Fair Housing and Tenant/Landlord Services FY 20-21

Target Area(s): Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford and Unincorporated Stanislaus County.

Goals Supported: Fair Housing and Tenant/Landlord Services

Needs Addressed: Affordable Housing

Funding: CDBG: \$25,000

Description: Stanislaus County will contract with a fair housing service provider that is a HUD certified fair housing agency, to carry out fair housing services. Funds will be used to provide fair housing information, housing counseling, and tenant/landlord mediation services to residents of the Stanislaus Urban County.

National Objective: N/A, Matrix Code: 21D

Presumed Benefit: N/A

Performance Objective: Address the need to affirmatively further fair housing through fair housing enforcement, fair housing awareness and housing counseling.

Performance Outcomes:

Number of Individuals receiving information and referral services: 40

Number of individuals benefitting from fair housing enforcement: 40

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 12 households and 40 individuals through information and referral.

Location Description: TBD

Planned Activities: Stanislaus County will contract with a HUD certified fair housing agency to carry out fair housing services. Funds will be used to provide fair housing information, housing counseling and tenant/landlord mediation services to residents of the Stanislaus Urban County.

4.5. PROJECT NAME: City of Ceres - CDBG Project Administration FY 20-21

Target Area(s): Ceres

Goals Supported: Improve Infrastructure in low-income neighborhoods
Fair Housing and Tenant/Landlord Services
Access to public services for low-income households

Needs Addressed: Public Infrastructure Improvement
Affordable Housing
Economic Development

Public Services
Homeless Services

Funding: CDBG: \$15,988

Description: This expenditure includes costs associated with management, oversight, and coordination of the related CDBG funded projects.

National Objective: N/A

Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 2720 2nd Street, Ceres, CA 95307

Planned Activities: Administration of City of Ceres's CDBG projects for FY 20-21

5.6. PROJECT NAME: City of Ceres - Morrow Village ADA Improvements FY 20-21

Target Area(s): Ceres

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$219,870

Description: The project has 4 phases and will provide sidewalk, installation of curb and gutter on Morrow Ave.. Project will be phased out and costs include design, engineering and construction.

National Objective: LMA

Matrix Code: 03K

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of Ceres

Performance Outcomes:

Number of households with access to infrastructure improvements: 70

Number of residents impacted by infrastructure improvement: 250

Target Date: 6/30/2022

Estimate the number and type of families that will benefit from the proposed activities:

Location Description: 2720 2nd Street, Ceres, CA 95307

Planned Activities: Infrastructure Improvements

6.7. PROJECT NAME: City of Hughson - CDBG Project Administration FY 20-21

Target Area(s): Hughson

Goals Supported: Improve Infrastructure in low-income neighborhoods
Fair Housing and Tenant/Landlord Services
Access to public services for low income household

Needs Addressed: Public Infrastructure Improvement
Affordable Housing
Economic Development
Homeless Services

Funding: CDBG: \$15,988

Description: This expenditure includes costs associated with management, oversight and coordination of the related CDBG funded projects.

National Objective: N/A

Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 7018 Pine Street, Hughson, CA 95326

Planned Activities: Administration of City CDBG projects for FY 2020-2021.

7.8. PROJECT NAME: City of Hughson - Walker Lane Infrastructure Project FY 20-21

Target Area(s): Hughson

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$165,187

Description: The project includes the installation of curb, gutter, sidewalk infill and ADA improvements. The project is part of a multi-year effort to complete sidewalk projects to improve connectivity, mobility and access for pedestrians. The project area is located along Walker Lane between Tully Road and 2nd Street. Project will be phased out and costs include design, engineering and construction.

National Objective: LMA

Matrix Code: 03K

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of Hughson

Performance Outcomes:

Number of households with access to infrastructure improvements: 50

Number of residents impacted by infrastructure improvement: 150

Target Date: 6/30/2023

Estimate the number and type of families that will benefit from the proposed activities: 140 Individuals/ 50 Households

Location Description: 7018 Pine Street, Hughson, CA 95326

Planned Activities: Infrastructure Improvements.

8.9. PROJECT NAME: City of Newman - CDBG Project Administration FY 20-21

Target Area(s): Newman

Goals Supported: Improve Infrastructure in low-income neighborhoods
Fair Housing and Tenant/Landlord Services
Access to public services for low-income households

Needs Addressed: Public Infrastructure Improvement
Affordable Housing
Economic Development
Public Services
Homeless Services

Funding: CDBG: \$15,988

Description: This expenditure costs associated with management, oversight, and coordination of the related CDBG funded projects.

National Objective: N/A

Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 1162 Main Street, Newman, CA 95360

Planned Activities: Administration of the City of Newman's CDBG projects for FY 2020-2021

9.10. PROJECT NAME: City of Newman - Hill Park Area Improvement Project FY 20-21

Target Area(s): Newman

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$52,110

Description: This project is to improve sidewalk, curbs, lights and make ADA improvements within the residential area surrounding the community park. This project would also increase amenities at Howard B. Hill Jr. Park; such as the construction of an amphitheater, lighting, ADA walkways, tables, a potential shade structure, restrooms and necessary electrical work. Project will be phased out and costs include design, engineering and construction.

National Objective: LMA

Matrix Code: 03F

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of Newman

Performance Outcomes:

Number of households with access to infrastructure improvements: 220

Number of residents impacted by infrastructure improvement: 602

Target Date: 6/30/2023

Estimate the number and type of families that will benefit from the proposed activities: 602 Individuals/220 Households

Location Description: 1162 Main Street, Newman, CA 95360

Planned Activities: Infrastructure Improvements

10.11. PROJECT NAME: City of Newman - Steffensen-Sunshine Park Area Improvements Project FY 20-21

Target Area(s): Newman

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$100,000

Description: This project is to improve sidewalk, curbs, lights and make ADA improvements within the residential area surrounding the community park. Project will be phased out and costs include design, engineering and construction.

National Objective: LMA

Matrix Code: 03F

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of Newman

Performance Outcomes:

Number of households with access to infrastructure improvements: 200

Number of residents impacted by infrastructure improvement: 510

Target Date: 6/30/2023

Estimate the number and type of families that will benefit from the proposed activities: 510 Individuals/ 200 Households

Location Description: 1162 Main Street, Newman, CA 95360

Planned Activities: Infrastructure Improvements

11.12. PROJECT NAME: City of Oakdale - CDBG Project Administration FY 20-21

Target Area(s): Oakdale

Goals Supported: Improve Infrastructure in low-income neighborhoods
Fair Housing and Tenant/Landlord Services
Access to public services for low-income households

Needs Addressed: Public Infrastructure Improvement
Affordable Housing
Economic Development
Public Services
Homeless Services

Funding: CDBG: \$15,988

Description: This expenditure costs associated with management, oversight, and coordination of the related CDBG funded projects.

National Objective: N/A

Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 280 N. 3rd Ave., Oakdale, CA 95361

Planned Activities: Administration of CDBG projects for FY 2020-2021.

12.13. PROJECT NAME: City of Oakdale - Wood Basin Area Storm Drain Improvements Project FY 20-21

Target Area(s): Oakdale

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$170,901

Description: The project will provide improved flood control measures for the area west of H Street, West I Street, South Wood Street, Wanda Way and Hinkley Avenue. Project will be phased out and costs include design, engineering and construction.

National Objective: LMA

Matrix Code: 03I

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of Oakdale

Performance Outcomes:

Number of households with access to infrastructure improvements: 1,950

Number of residents impacted by infrastructure improvement: 650

Target Date: 6/30/2023

Estimate the number and type of families that will benefit from the proposed activities: 1,950 Individuals/650 Households

Location Description: 280 N. 3rd Street, Oakdale, CA 95361

Planned Activities: Infrastructure Improvements

13.14. PROJECT NAME: City of Patterson - CDBG Project Administration FY 20-21

Target Area(s): Patterson

Goals Supported: Improve Infrastructure in low-income neighborhoods
Fair Housing and Tenant/Landlord Services
Access to public services for low-income households

Needs Addressed: Public Infrastructure Improvement
Affordable Housing
Economic Development
Public Services
Homeless Services

Funding: CDBG: \$15,988

Description: This expenditure costs associated with management, oversight, and coordination of the related CDBG funded projects.

National Objective: N/A

Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 1 Plaza, Patterson, CA 95363

Planned Activities: Administration of the City of Patterson's CDBG projects for FY 2020-2021.

14.15. PROJECT NAME: City of Patterson – C and D Street Washburn Infrastructure Improvements Project FY 20-21

Target Area(s): Patterson

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$183,508

Description: This project includes the installation of curb, gutter, sidewalk and ADA improvements. Project will be phased out and costs include design, engineering and construction.

National Objective: LMA

Matrix Code: 03I

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of Patterson

Performance Outcomes:

Number of households with access to infrastructure improvements: ~~65~~ **241**

Number of residents impacted by infrastructure improvements: ~~225~~ **723**

Target Date: 6/30/2022

Estimate the number and type of families that will benefit from the proposed activities: ~~225~~**723** Individuals/ ~~65~~ **241** Households

Location Description: 1 Plaza, Patterson, CA 95363

Planned Activities: Infrastructure Improvements

15.16. PROJECT NAME: City of Riverbank - CDBG Project Administration FY 20-21

Target Area(s): Riverbank

Goals Supported: Improve Infrastructure in low-income neighborhoods

Fair Housing and Tenant/Landlord Services
Access to public services for low-income households

Needs Addressed: Public Infrastructure Improvement
Affordable Housing
Economic Development
Public Services
Homeless Services

Funding: CDBG: \$15,988

Description: This expenditure costs associated with management, oversight, and coordination of the related CDBG funded projects.

National Objective: N/A
Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 6707 3rd Street, Riverbank, CA 95367

Planned Activities: Administration of the City of Riverbank's CDBG projects for FY 2020-2021.

16.17. PROJECT NAME: City of Riverbank – Castleberg Park Trail Project FY 20-21

Target Area(s): Riverbank

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$110,000

Description: Projects includes rehabilitation and repairs for pedestrian safety improvements to the walkway/trail loop located at Castleberg Park on the corner of Kentucky and 8th Street. This will improve the safety of the trail for pedestrians and add ADA accessibility to areas of the park that were previously inaccessible. Project will include design, engineering, and construction costs.

National Objective: LMA

Matrix Code: 03I

Presumed Benefit: No

Objective: Improve the need for pedestrian and ADA accessibility within the City's Parks

Performance Outcomes:

Number of households with access to infrastructure improvements:65

Number of residents impacted by infrastructure improvement:225

Target Date: 6/30/2023

Estimate the number and type of families that will benefit from the proposed activities: 225 Individuals/ 65 Households

Location Description: 6707 3rd Street, Riverbank, CA 95367

Planned Activities: Infrastructure Improvements

17.18. PROJECT NAME: City of Riverbank – Castleberg Park ADA Improvements Project FY 20-21

Target Area(s): Riverbank

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$25,000

Description: ADA accessibility improvements to Castleburg Park located at the corner of Kentucky & 8th Street. Project will include ADA enhancements to ensure accessibility by the disabled community to areas such as the playground, restrooms, and the baseball fields. This is a multi-year project that will be phased based on funding availability and will include design, engineering, and construction costs.

National Objective: LMA

Matrix Code: 03I

Presumed Benefit: No

Objective: Improve ADA accessibility to our disabled residents in conformance with the City of Riverbank adopted ADA Transition Plan

Performance Outcomes:

Number of households with access to infrastructure improvements:65

Number of residents impacted by infrastructure improvement:225

Target Date: 6/30/2023

Estimate the number and type of families that will benefit from the proposed activities: 225 Individuals/ 65 Households

Location Description: 6707 3rd Street, Riverbank, CA 95367

Planned Activities: Infrastructure Improvements

18.19. PROJECT NAME: City of Riverbank – Pioneer Park ADA Improvements Project FY 20-21

Target Area(s): Riverbank

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$12,549

Description: ADA accessibility improvements to Pioneer Park located at the corner of 1st and High Street. Project will include ADA enhancements to ensure accessibility by the disabled community to areas such as the playground, restrooms, and the Scouts Hall Event Center. This is a multi-year project that will be phased based on funding availability and will include design, engineering, and construction costs.

National Objective: LMA

Matrix Code: 031

Presumed Benefit: No

Objective: Improve ADA accessibility to our disabled residents in conformance with the City of Riverbank adopted ADA Transition Plan

Performance Outcomes:

Number of households with access to infrastructure improvements:65

Number of residents impacted by infrastructure improvement:225

Target Date: 6/30/2023

Estimate the number and type of families that will benefit from the proposed activities: 225 Individuals/ 65 Households

Location Description: 6707 3rd Street, Riverbank, CA 95367

Planned Activities: Infrastructure Improvements

19.20. PROJECT NAME: City of Waterford - CDBG Project Administration FY 20-21

Target Area(s): Waterford

Goals Supported: Improve Infrastructure in low-income neighborhoods
Fair Housing and Tenant/Landlord Services
Access to public services for low-income households

Needs Addressed: Public Infrastructure Improvement
Affordable Housing
Economic Development
Public Services
Homeless Services

Funding: CDBG: \$15,988

Description: This expenditure costs associated with management, oversight, and coordination of the related CDBG funded projects.

National Objective: N/A

Matrix Code: 21A

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: N/A

Location Description: 101 E Street, Waterford, CA 95386

Planned Activities: Administration of CDBG projects for FY 2020-2021

20.21. PROJECT NAME: City of Waterford - Main Street Infrastructure Project FY 20-21

Target Area(s): Waterford

Goals Supported: Improve Infrastructure in low-income neighborhoods

Needs Addressed: Public Infrastructure Improvement

Funding: CDBG: \$223,726

Description: The project includes curb, gutter, and ADA ramps on the north side of Main Street between H Street and I Street. Project costs include design and engineering.

National Objective: LMA

Matrix Code: 03I

Presumed Benefit: No

Objective: Address the need for infrastructure improvements in the low-income residential area of Waterford

Performance Outcomes:

Number of households with access to infrastructure improvements: 30

Number of residents impacted by infrastructure improvement: 90

Target Date: 6/30/2024

Estimate the number and type of families that will benefit from the proposed activities: 90 Individuals/ 30 Households

Location Description: 101 E Street, Waterford, CA 95386

Planned Activities: Infrastructure Improvements

21-22. PROJECT NAME: Court Appointed Special Advocates (CASA) - Direct Services Project FY 20-21 (CDBG-PSG)

Target Area(s): Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford and Unincorporated Stanislaus County

Goals Supported: Access to public services for low income household

Needs Addressed: Public Services

Funding: CDBG: \$25,000

Description: CASA connects youth in foster care with case managers who advocate for them throughout their time in the foster care system. At risk youth in the foster care system are referred to CASA by the Stanislaus County Superior Court to provide advocacy services for children in dependency. The advocate works with everyone involved and makes independent informed recommendation on the child's behalf directly to the judge who makes all orders regarding the case. For many abused children their CASA advocate will be the one constant adult presence in their lives.

National Objective: LMC

Matrix Code: OSD

Presumed Benefit: No

Objective: Provide case management, advocacy and legal assistance to youth in the foster care system.

Performance Outcomes:

Number of dependent youths provided coordinated case management: 20

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 20 youth individuals

Location Description: 800 11th Street, #4 Modesto, CA 95354

Planned Activities: Case Management

22.23. PROJECT NAME: Center for Human Services - Ceres Partnership-Concrete Support in Times of Need FY 20-21 (CDBG-PSG)

Target Area(s): Ceres and Unincorporated Areas

Goals Supported: Access to public services for low-income household

Needs Addressed: Public Services

Funding: CDBG: \$25,000

Description: CHS in partnership with Ceres Partnership for Healthy Children (CPHC) will provide emergency assistance (food, utility assistance, transportation) to low-income families from the Ceres area through their Concrete Support in Times of Need Program. The agency provides case management services to families referred from the local school districts, law enforcement, Community Services Agency, local businesses or self-referred. Families will receive a Family Development Assessment to determine need and to help with future family goal planning. Families that are in need of emergency assistance would work with a Family Advocate to access other programs such as housing assistance, Ca-Fresh, Temporary Assistance for Needy Families, Women, Infants and Children (WIC) Food and Nutrition Services Program and other community programs.

National Objective: LMC

Matrix Code: 05

Presumed Benefit: No

Objective: Provide case management, utility assistance and support services to low income households.

Performance Outcomes:

Number of residents that receive case management and support services: 50

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 90 Individuals/30 Households

Location Description: 1317 Grandview Ave., Ceres, CA 95307

Planned Activities: Case Management, Financial Literacy, Utility Assistance and Food Assistance.

23.24. PROJECT NAME: Center for Human Services - Oakdale Family Resource Center- Crisis Support Program FY 20-21 (CDBG-PSG)

Target Area(s): Oakdale and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$25,000

Description: CHS will assist residents and families from Oakdale, Valley Home and Knights Ferry and the surrounding area who need assistance with utility bills, food, clothing, emergency shelter and mental health or alcohol and drug counseling services through their Crisis Support Program at the Oakdale Family Resource Center (FRC). A Family Advocate will provide strength-based assessments, an empowerment plan with goals, resource and referrals and other needed services.

National Objective: LMC

Matrix Code: 05

Presumed Benefit: No

Objective: Provide case management, utility assistance and support services to low income households.

Performance Outcomes:

Number of residents that receive case management and support services: 50

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 50 Individuals/17 Households

Location Description: 631 West F Street, Oakdale, CA 95361

Planned Activities: Case Management, Utility Assistance, basic financial literacy, food assistance and emergency housing assistance.

24.25. PROJECT NAME: Center for Human Services - Westside Family Resource Centers- Supportive Services FY 20-21 (CDBG-PSG)

Target Area(s): Newman, Patterson and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$16,065

Description: The Westside Family Resource Center will provide case management and crisis intervention, utility assistance, emergency food assistance and resource and referral services for low-income families in need residing on the west side of the County. Families and individuals that are in need of utility assistance must work with a case manager to complete a three session Budget and Financial Planning Training in order to receive the utility assistance. Families and individuals in need of emergency food receive a one-time emergency food bag and would be referred to our nutrition classes to help address any future emergency food needs. CHS will work with community partners on the Westside to maximize the number and depth of resources provided to the homeless or low- income residents seeking services and support.

National Objective: LMC

Matrix Code: 05

Presumed Benefit: No

Objective: Provide case management, utility assistance and support services to low income households.

Performance Outcomes: Number of residents that receive case management and support services: 40

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 40 Individuals/ 15 Households

Location Description: 118 N. 2nd Street, Suite D, Patterson, CA 95363

Planned Activities: Case Management, Utility Assistance, basic financial literacy, food assistance and emergency housing assistance.

25.26. PROJECT NAME: Children's Crisis Center - Single Parent Intervention Services @ Guardian House FY 20-21 (CDBG-PSG)

Target Area(s): Oakdale and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$24,984

Description: This project will provide emergency child care, meals, crisis intervention and support services to a disadvantaged population of high-risk infants, toddlers and school-age children living in Oakdale, Valley Home, Hughson, Empire, Hickman and Waterford. The projects will deliver specialized care to an impoverished population of children growing up within families experiencing abuse, domestic violence, and or homelessness. These children will be members of families living in very-low, low- and moderate-income households enduring various social and economic challenges

National Objective: LMC

Matrix Code: 05N

Presumed Benefit: No

Objective: Provide essential support services to low- and moderate-income children at risk of abuse, neglect, homelessness by providing childcare shelter and meals.

Performance Outcomes:

Number of residents that receive case management and support services: 85

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 85 Individuals/23 Households

Location Description: Confidential due to nature of activity

Planned Activities: Case Management, Emergency Child Care, Shelter and Supportive Services

26.27. PROJECT NAME: Children's Crisis Center - Single Parent Intervention Services @ Marsha's House FY 20-21 (CDBG-PSG)

Target Area(s): Ceres, Patterson and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$24,984

Description: This project will provide shelter, emergency care meals, crisis intervention and homeless supportive services to high-risk infants and toddlers ages birth -3 years living in Ceres, Empire, Grayson, Patterson, Salida, Westley and incorporated Modesto. This project will deliver specialized shelter to this population of children growing up with families experiencing poverty, domestic violence, abuse and or homelessness.

National Objective: LMC

Matrix Code: 05N

Presumed Benefit: No

Objective: Provide essential support services to low- and moderate-income children at risk of abuse, neglect, homelessness by providing childcare shelter and meals.

Performance Outcomes:

Number of residents that receive case management and support services: 105

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 105 Individuals/30 Households

Location Description: Confidential due to nature of activity

Planned Activities: Case Management, Emergency Child Care, Shelter and Supportive Services

27.28. PROJECT NAME: Children's Crisis Center - Single Parent Intervention Services @ Verda's House FY 20-21 (CDBG-PSG)

Target Area(s): Newman, Patterson and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$24,984

Description: This program will provide shelter, emergency care, meals, crisis intervention and homeless support services to an impoverished population of high-risk infants, toddlers and school-age children ages birth to 17, living in the incorporated areas of Turlock, Newman, Patterson, Hughson, Hickman and Waterford. *National Objective: LMC*

Matrix Code: 05N

Presumed Benefit: No

Objective: Provide essential support services to low- and moderate-income children at risk of abuse, neglect, homelessness by providing childcare shelter and meals.

Performance Outcomes:

Number of residents that receive case management and support services: 65

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 65 Individuals/20 Households

Location Description: Confidential due to nature of activity

Planned Activities: Case Management, Emergency Child Care, Shelter and Supportive Services

28.29. PROJECT NAME: The Salvation Army Red Shield – At Risk Teen Program FY 20-21 (CDBG-PSG)

Target Area(s): Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$25,000

Description: This program will provide teens a safe place to go after school, mentoring, and recreational activities. Hours of operation for the program are Monday through Thursday from 2:30pm until 6:30pm and on Friday until 9:00pm. Monday through Thursday the program will provide space for teens to do homework, use the computer lab, and receive mentoring. Friday afternoon the focus will be on special recreational activities for the participating teens.

National Objective: LMC

Matrix Code: 05D

Presumed Benefit: No

Objective: Provide after school recreational youth activities for low income youth in south Modesto and the surrounding unincorporated area.

Performance Outcomes:

Number of residents that receive case management and support services: 125

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 125 Youth

Location Description: 1649 Las Vegas Street, Modesto, CA 95358

Planned Activities: Youth Services

29.30. PROJECT NAME: United Samaritans Foundation – Daily Bread Mobile Lunch Program – Westside FY 20-21 (CDBG-PSG)

Target Area(s): Newman, Patterson, and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$20,000

Description: This program will provide a daily meal program to those living in poverty in the Urban County areas.

National Objective: LMC

Matrix Code: 05

Presumed Benefit: No

Objective: Provide case management, emergency shelter, utility assistance, rental assistance and support services to low income individuals.

Performance Outcomes:

Number of residents that receive food assistance: 50

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 50 Individuals/50 Households

Location Description: 220 S. Broadway, Turlock, CA 95830

Planned Activities: Food Assistance

30.31. PROJECT NAME: United Samaritans Foundation – Daily Bread Mobile Lunch Program- Hughson FY 20-21 (CDBG-PSG)

Target Area(s): Ceres, Hughson, Oakdale, Riverbank, Waterford and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Needs Addressed: Public Services

Funding: CDBG: \$20,000

Description: This program will provide a daily meal program to those living in poverty in the Urban County areas.

National Objective: LMC

Matrix Code: 05

Presumed Benefit: No

Objective: Provide case management, emergency shelter, utility assistance, rental assistance and support services to low income individuals.

Performance Outcomes:

Number of residents that receive food assistance: 150

Target Date: 6/30/2021

Estimate the number and type of families that will benefit from the proposed activities: 150 Individuals/150 Households

Location Description: 220 S. Broadway, Turlock, CA 95830

Planned Activities: Food Assistance

31.32. PROJECT NAME: Stanislaus County – Small Business Assistance Program- FY 20-21 (CDBG-PSG)

Target Area(s): Ceres, Hughson, Oakdale, Newman, Patterson, Riverbank, Waterford and surrounding Unincorporated Stanislaus County

Goals Supported: Financial and technical assistance for small businesses affected by the Coronavirus (COVID 19)

Needs Addressed: Economic Development

Funding: CDBG: \$115,000

Description: This program will provide small business loan and grants to businesses in the Urban County areas.

Assistance to Businesses, including Special Economic Development Assistance

Provision of assistance to private, for-profit entities, when appropriate to carry out an economic development project.

*See section 105(a)(17) (42 U.S.C. 5305(a)(17)); 24 CFR 570.203(b). **Activities could include, but are not limited to:***

Provide grants or loans to support new businesses or business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease.

Avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons.

Provision of assistance to microenterprises. *See section 105(a)(22) (42 U.S.C. 5305(a)(22)); 24 CFR 570.201(o). **Activities could include, but are not limited to:***

Provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, **food delivery, cleaning, and other services to support home health and quarantine.**

National Objective: LMC

Matrix Code: 05

Presumed Benefit: No

Objective: Provide small businesses that were affected by COVID 19, ten grants or loan to help stabilize their business .

Performance Outcomes:

Number of businesses that receive economic development services: ~~50~~ 10

Target Date: ~~6/30/2021~~ 6/30/2025

Estimate the number and type of families that will benefit from the proposed activities: ~~150 Individuals/150 Households~~ 10 Individuals

Location Description: 1010 10th Street, Suite #3400, Modesto, CA

Planned Activities: Economic Development Services

33. PROJECT NAME: Stanislaus County – Community Emergency Response Program FY 20-21 (CDBG-CARES)

Target Area(s): Ceres, Hughson, Oakdale, Newman, Patterson, Riverbank, Waterford and surrounding Unincorporated Stanislaus County

Goals Supported: Access to public services for low income households

Property Acquisition

Property Rehabilitation

Needs Addressed: Public Services

Funding: CDBG-CARES: TBD

Description: This program will provide Urban County members funding to address COVID 19 related emergencies in their communities. Funding may be utilized for the following:

Buildings and Improvements, Including Public Facilities

Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. *See section 105(a)(2) (42 U.S.C. 5305(a)(2)); 24 CFR 570.201(c). Activities could include, but are not limited to:*

Construct a facility for testing, diagnosis, or treatment.

Rehabilitate a community facility to establish an infectious disease treatment clinic.

Acquire and rehabilitate, or construct, a group living facility that may be used to centralize patients undergoing treatment.

Rehabilitation of buildings and improvements (including interim assistance). *See section 105(a)(4) (42 U.S.C. 5305(a)(4)); 24 CFR 570.201(f); 570.202(b). Activities could include, but are not limited to:*

Rehabilitate a commercial building or closed school building to establish an infectious disease treatment clinic, e.g., by replacing the HVAC system.

Acquire, and quickly rehabilitate (if necessary) a motel or hotel building to expand capacity of hospitals to accommodate isolation of patients during recovery.

Public Services: (subject to maximum cap)

Provision of new or quantifiably increased public services. *See section 105(a)(8) (42 U.S.C. 5305(a)(8)); 24 CFR 570.201(e). Activities could include, but are not limited to:*

Carry out job training to expand the pool of health care workers and technicians that are available to treat disease within a community.

Activities include but are not limited to: Provide testing, diagnosis or other services at a fixed or mobile location.

Increase the capacity and availability of targeted health services for infectious disease response within existing health facilities.

Provide equipment, supplies, and materials necessary to carry-out a public service.

Deliver meals on wheels to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.

National Objective: LMC

Matrix Code: 05

Presumed Benefit: No

Objective: Provide case management, emergency shelter, utility assistance, rental assistance and support services to low income individuals.

Performance Outcomes:

Number of residents that receive food assistance: 150

Target Date: 6/30/2025

Estimate the number and type of families that will benefit from the proposed activities: 150 Individuals/150 Households

Location Description: 1010 10th Street, Suite #3400, Modesto, CA

Planned Activities: Public Services, Property Acquisition and Rehabilitation

32.34. PROJECT NAME: Stanislaus County - ESG Program FY 20-21 (ESG)

Target Area(s): Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford, and surrounding Unincorporated Stanislaus County.

Goals Supported:

- Shelter for Homeless Person
- Rapid Re-Housing for Homeless Persons
- Homeless Prevention
- Homeless Services Data Collection

Needs Addressed: Homeless Services

Funding: ESG: \$202,628

Description: The following are the proposed ESG funding recommendations for FY 2020-2021:

- Community Housing and Shelter Services- HMIS Data Support: \$9,197
- We Care Program- Emergency Shelter: \$33,632
- Family Promise- Shelter to Solutions-New Beginnings Program: \$144,602
- Stanislaus County ESG Administration: \$15,197

Target Date: 6/30/2022

Estimate the number and type of families that will benefit from the proposed activities: An estimated 340 individuals will be sheltered with the assistance of federal ESG funded program funds by Family Promise and the We Care Program. Homeless Prevention Services and Rapid Re- Housing services will also be provided by Family Promise to 30 individuals/11 households with rental assistance.

Location Description: 1010 10th Street, Suite #3400, Modesto, CA 95354

Planned Activities: Shelter, Homeless Services, Rental Assistance and Case Management

AP-50 Geographic Distribution

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The Stanislaus Urban County and City of Turlock, as the lead entity of the HOME Consortium, do not have plans to pursue any official HUD designated geographic based priority areas. Funds will be allocated within each jurisdiction based on program eligibility and in accordance with priority needs and goals outlined in this section.

AP-55 Affordable Housing

Introduction

The tables in this section provide estimates on the number of homeless, non-homeless, and special needs households to be provided affordable housing during the program year and the number of affordable units that will be provided by program type, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units.

One Year Goals for the Number of Households to be Supported	
Homeless	4
Non-Homeless	6
Special-Needs	2
Total	12

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	8
Acquisition of Existing Units	4
Total	12

Discussion

Housing assistance and programs were identified as a community need via the Consolidated Plan process. In Fiscal Year 2020-2021, the City of Turlock and the HOME Consortium will continue to use funds available to address the variety of housing needs within the jurisdiction. Although the City of Turlock and the HOME Consortium have identified housing assistance and housing programs as priorities, the City of Turlock and HOME Consortium members' ability to contribute toward the provision and development of affordable housing programs/projects has been drastically limited both by the State of California's elimination of redevelopment agencies which was the most significant tool for the provision of affordable

housing, economic development, job creation, and elimination of blight, as well as by the steadily increasing price of the housing market in terms of land, labor, construction, and materials.

AP-60 Public Housing

Introduction

The City of Turlock, Stanislaus Urban County, and the Stanislaus Regional Housing Authority (Housing Authority) continue to have a close working relationship and meet on an as-needed basis to discuss concerns relevant to public housing and other housing matters. The Stanislaus Urban County will continue to work with the Housing Authority, the City of Turlock, and other public and private housing and social service agencies to foster public housing improvements and resident initiatives.

Actions planned during the next year to address the needs to public housing

The Housing Authority's mission is committed to addressing the unmet housing needs of residents and communities in the county, consistent with Federal, State, and local law. The Housing Authority owns and operates public housing units in addition to operating the Housing Choice Voucher Program.

The Housing Authority operates 647 conventional public housing units throughout Stanislaus County in five Asset Management Properties (AMP). AMP 1 contains a total of 149 units located in Oakdale, Turlock, Ceres, and Hughson. AMP 2 contains a total of 66 units located in Newman, Patterson, and Westley. The remaining 432 units are located in AMPs 3, 4, and 5 in the City of Modesto.

The Housing Authority operates several affordable housing programs in addition to Public Housing, including year-round Farm Labor Housing, Seasonal Migrant Farm Worker Housing, and several smaller affordable housing properties including units funded under the Neighborhood Stabilization Program and the Housing Choice Voucher Program. These affordable housing programs will continue to operate in the 2020-2021 program year.

The Housing Authority is always working to increase the stock of affordable housing in Stanislaus County through other available resources, programs, and partnerships as opportunities arise.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority previously implemented a services and communication "quality control" system that provides the Housing Authority with immediate customer feedback and identifies areas that may need improvement. The Housing Authority has also implemented a resident education program with regularly scheduled meetings and written communications on agency policy, rules, and leases.

Efforts to improve communications with residents and program participants include on site resident training/informational meetings, regular newsletters and flyers.

Efforts to improve communications with residents and program participants include: on site resident training/informational meetings, regular newsletters and flyers. The Housing Authority has implemented a "curbside" appearance program. The focus of the program is the exterior of buildings, parking areas,

play grounds and other areas of the complexes. Rodent and insect problems are addressed when residents report a problem and/or on Annual Inspections. In an effort to better education residents concerning these problems, information is regularly provided through the Housing Authority newsletter. These actions have assisted the Housing Authority in creating an atmosphere which emphasizes customer satisfaction and communication

Further, the Housing Authority has a Resident Advisory Board (RAB) which represents the residents assisted by the agency. The RAB assists in the development of the Housing Authority's five-year Plan. Resident involvement will continue to be supported in an effort to enhance the service delivery by taking into account input from those with lived experience.

These actions have assisted the Housing Authority in creating an atmosphere which emphasizes customer satisfaction and communication.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Housing Authority is not designated as a troubled Housing Authority.

AP-65 Homeless and Other Special Needs Activities

In March 2017, the Stanislaus Housing and Supportive Services Collaborative, the local CoC was restructured and renamed the Stanislaus Community System of Care (CSoc). The new locally recognized CoC's membership elected a new 25-member Board and sub-committees. The CoC Board is comprised of representatives from homeless advocates, community members, and service providers, as well as public and private sector agencies in the County. The CoC Board meets on a monthly basis to identify gaps and needs in homeless services and to pursue an overall systematic approach to address homelessness. There are public meetings in which the community of providers and stakeholders are welcome to attend and provide comment. The Urban County is represented on the CoC Board by the Director of Planning and Community Development. Through regular attendance and participation in the CoC meetings, the Urban County consults with the CoC to develop cooperative plans and strategies to leverage resources to provide emergency shelter and rapid re-housing services, and is informed of changes in local goals, objectives and performance measures. The recognition of homelessness as a social and economic issue is uniting service providers, businesses & the public and private sectors in achieving compliance with the HEARTH Act, adopting best practices to end chronic homelessness, and improving the system to rapidly re-house individuals and families.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Urban County is a partner and stakeholder in the CoC, regularly attending CoC meetings and actively contributing to creating efficient processes. The CoC has become increasingly efficient in use of funds and allocation of non-financial resources with the implementation of a Coordinated Entry System (CES). A CES Task Force was formed and meets regularly to continually improve the system and ensure it is an effective

tool. There are several service providers within the CoC that conduct street outreach throughout the County. Through Behavioral Health and Recovery Services (BHRS) and a collaboration of several other County departments, an Outreach and Engagement Center (OEC) was established in 2018. The OEC coordinates the provision of multiple services throughout the County for those experiencing homelessness. Teams of outreach workers go out five (5) days a week to connect homeless individuals directly with benefits and services to engage those who may otherwise not seek assistance. The OEC also serves as a physical entry point for support through assessments and referrals and is open for walk-in access Monday through Friday.

Addressing the emergency shelter and transitional housing needs of homeless persons

Shelters in Stanislaus County receive a combination of federal, state, local, private, and foundation funding from a diversified stream of sources including: The County's BHRS and CSA, federal CoC, ESG and CDBG programs, community foundations, and others. In total, there are 14 shelters represented on the 2018 HUD Housing Inventory Count (HIC), including several for specific populations like youth, families, or adults. There is a continued dedication to low-barrier, housing-focused shelters to move those without a place to live into permanent housing, and clients from the We Care Program, Children's Crisis Center, Community Housing and Shelter Services (CHSS), and Family Promise were able to receive rapid re-housing assistance to become stable housed. In November 2019 the County opened a 180 bed Emergency Shelter that includes a Permanent Access Center. Approximately 45% of the Fiscal Year 2020 ESG award (not including state ESG) funded programs that provide emergency shelter (both seasonal and year-round).

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The CoC continues to hone-in on system processes and address gaps in the service delivery system to ensure that specific vulnerable sub-populations do not fall through the cracks. As the CoC partnerships grow and each entity becomes more understanding of their role as well as the roles of other agencies, the system will yield more effective results for those individuals and families that are experiencing homelessness. The Coordinated Entry System (CES) is an effective tool in minimizing the number of days someone experiences homelessness.

The delivery of wrap-around services is critical to the long-term success of those individuals and families that have experienced homelessness but are now housed. Through the CoC, there are housing supports made available, offering financial assistance, security deposits, legal services, credit repair, utility payments, counseling, among others. It is understood by the CoC and its partners that the end goal is not to simply find housing, but to maintain stable housing.

Agencies that are funded through the County's ESG program are required to participate in the planning and development of the County's Coordinated Entry System (CES). ESG sub-grantees must participate in

the client referral system as long as it does not place a financial burden on the agency and compromise their other funding sources. Some of the larger agencies within the County that provide resources for homeless individuals and families include: We Care Program-Turlock, Family Promise of Greater Modesto, The Salvation Army, Children's Crisis Center, HOST House, and the Modesto Gospel Mission. Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) make the transition to permanent housing and independent living is an overall goal of the CoC.

The Urban County works with the CoC to work towards this goal by funding programs with ESG funds that aim to shorten the period of time that individuals and families experiences homelessness, facilitate access for homeless individuals and families to affordable housing units, and prevent individuals and families who were recently homeless from becoming homeless again. The Urban County's homeless strategy also places a high priority on providing rental assistance, housing relocation and stabilization services to persons and households experiencing homelessness. Approximately 40% of the FY 19-20 ESG award will go towards ESG programs that provide rental assistance, utility assistance, payment of rental and utility arrears, or rental or utility deposits in combination with case management which works with clients on an individual basis to sustain permanent housing. In addition, a minimum 40% of the state ESG funds are required to be allocated for rapid re-housing activities. The program utilized housing search and placement services, intensive case management, and rental assistance to remove barriers to permanent housing for homeless persons and persons 30% or under the AMI who are at-risk of losing their housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The *Plan to Address Homelessness in Stanislaus County* identifies discharge planning as a key part of the strategy in addressing homelessness throughout the County moving forward. Acknowledging that further collaboration among public institutions and other system of care providers needs to occur so that no individual or family is discharged into homelessness, the CoC continues to work on these issues through awareness campaigns and coordinated efforts to align services and resources among CoC partners. The Urban County helps lead in the coordination of Continuum-wide services.

Local health care facilities have specific protocol in place requiring a safe discharge for all patients. In 2008, the County's Public Health Agency reestablished the task force to review the current protocol in place and address any gaps in services necessary to ensure successful discharge planning services. Currently in place there are discharge planning social workers on staff at the hospitals who work with service providers to locate appropriate housing that could include HUD McKinney-Vento funded emergency shelters, transitional or permanent housing units and prevent the release of patients to the streets. For adults recently released from custody, the County addresses housing issues through the Day Reporting Center (DRC). The Sheriff's Department conducts Probation Orientation meetings at the DRC in which several programs have participated in the past including Solidarity, Teen Life Challenge, and Modesto Gospel Mission.

As a result of the CoC's coordination with the Probation Department and the Sheriff's Office, a diversion program was started in 2016. The diversion program helps homeless who would otherwise be jailed for minor crimes stay at the Salvation Army shelter facility, where they receive overnight shelter and case management services. The County has transitional living procedures in place for juveniles exiting foster care to address youth in placement where the long-term plan is emancipation. These procedures are required by both the State and Federal governments. The County develops a 90-day transition plan that includes a housing component. A lead officer received a list of those eligible minors from the case officers and works with the case officer, minor, family, and any services providers to develop the plan prior to the minor's last status review (usually at 18 years old). A status review is a court hearing to review the minor's status in placement. The plans are submitted to the court and all involved parties, including the minor.

AP-75 Barriers to affordable housing

Introduction

The Stanislaus Urban County works with the City of Turlock, who is the lead agency for the City of Turlock/Stanislaus County HOME Consortium in efforts to provide affordable housing opportunities. One of the main barriers to affordable housing, both rental and homeownership, has been the supply of affordable housing units. For residents that are renting, the rents in the area have increased and made it difficult for renters to move or new renters to find housing units. In the area of homeownership, many residents are outpriced and cannot afford to purchase the homes that are available. Some of the barriers that impact the availability of affordable housing are outlined below.

Accessory Dwelling Units (ADUs):

Separate living quarters on a property (also called a "granny flat" or "guesthouse" can add additional housing units into single-family residential neighborhoods. Government regulations of ADUs can reduce or eliminate this housing development. Passage of numerous California legislative bills in 2017 and 2019 have eliminated many of the local impediments to the construction of ADU's and all Urban County jurisdictions are working update their ordinance to comply with the State's new ADU laws. In the interim state law prevails.

Shortage of Affordable Housing Funding:

The availability of funding for affordable housing has dropped dramatically in the past decade for all jurisdictions in California that do not have local public or private housing funds. Dissolution of redevelopment agencies in the State of California in 2012, including the Modesto Redevelopment Agency, resulted in a significant drop in funding for housing projects.

Competition for tax credits and other State funding with cities in California and diminished amounts of HUD funding create a shortage of affordable housing.

Planning and Development Fees:

Housing development imposes short- and long-term costs upon local government, such as the cost of providing site reviews, permitting and inspection, and maintaining General Plan and zoning regulations addressing housing development. Jurisdictions also charge impact fees to offset the cost of providing the

infrastructure and public facilities that are required to serve new housing development. To help recoup costs and ensure that essential services and infrastructure are available when needed, Stanislaus County jurisdictions charge various types of development fees. The fee amounts vary based on the needs of each jurisdiction and the services provided.

The fees can be a significant factor in housing development throughout California, raising housing costs and disincentivizing new residential development, factors that contribute to statewide high housing costs. Among California jurisdictions, fees account for between six and eighteen percent of the price of housing. (Turner Center for Housing Innovation- UC Berkeley, It All Adds Up: The Cost of Housing Development Fees in Seven California Cities, March 2018.)

As a best practice, the public and developers should be able to access a jurisdiction's current fee schedules to estimate fees as a part of total development project costs in advance.

Until 1978, property taxes were the primary revenue source for financing the construction of infrastructure and improvements for residential development in California. Proposition 13, passed in 1978, limited a local jurisdiction's ability to raise property taxes and increasing reliance on other funding sources to provide infrastructure, public improvements, and public services. An alternative funding source widely used among local governments in California is the development impact fee, which is charged to the project developers/owners, for publicly provided infrastructure that supports the development, including water and sewer facilities, parks, and transportation.

For jurisdictions to charge an impact fee, the California Mitigation Fee Act requires that the jurisdiction demonstrate the "nexus" between the type of development in question and the impact being mitigated by the proposed fee, and that fee amount be proportional to the impact caused by the development. Fees not covered by the California Mitigation Fee Act include inclusionary housing ordinance in-lieu fees, permit processing fees, utility connection fees, and fees included within specific development agreements between a jurisdiction and a developer.

Despite state law limiting direct impact fees, the fees can be a large part of a jurisdiction's total fee requirements for housing development. Because developers tend to pass these fees onto the final housing owner, the effects of reducing these fees on housing affordability depend on the amount of the fee reduction and current home prices. Because the eventual owner bears the brunt of fees, high fees limit development of lower-cost housing more than higher-cost housing. (Turner Center for Housing Innovation- UC Berkeley, Current Practices and Policy Considerations to Improve Implementation of Fees Governed by the Mitigation Fee Act, August 2019)

A reduction in development fees for low-income housing may help these projects become financially feasible. A jurisdiction deferring development fees until a certain time after project completion can also help add flexibility the project's upfront costs and assist in the development of low-income housing.

Municipal Processing Time:

The processing time required to obtain full approval of a development project is often cited as a contributing factor to the high cost of housing in the State of California. Review and legislative approval, while often necessary steps in the development process, add to the cost of construction by increasing land holding costs and interest payments. Governments are not always able to control delays when multiple levels of government that must communicate, review, and approve plans, delays due to the

schedule or timing of legislative boards of approval, or delays based on the amount of municipal staff capacity to review plans when demand for services is high.

Prevailing Wages:

Davis-Bacon prevailing wage must be paid to laborers when federal Community Development Block Grant (CDBG) dollars are used to pay for any construction project over \$2,000 or on any multifamily housing project over eight units. Prevailing wage must also be paid on any HOME-funded multifamily housing project that directly funds twelve or more units. While competitive wages are currently high, Davis-Bacon wages may be higher and add additional cost to housing construction and rehabilitation activities.

California's Prevailing Wage Law requires contractors to pay minimum wage rates on public works projects that support housing construction such as roads, water and sewer projects, and other public utilities. The rates are set by the California Department of Industrial Relations. These additional costs could add to local costs for housing development.

Expiration of Affordability Contracts:

Affordability contracts with private property owners have a time limit that runs out after a contractually-set number of years. Unless the affordability contracts are renewed with the property owner, the affordable rental housing units will expire and become market-rate housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

Potential constraints to housing development vary by area throughout the Stanislaus Urban County, but generally include cost of infrastructure, residential development fees, development standards, land use entitlement processing times, and limited funding for affordable housing development. Barriers to housing also include personal barriers such as poor credit history, involvement with the law, limited knowledge about tenants' rights and the complaints process.

Development Process: To expedite project facilitation and provide internal support to project applicants, the Stanislaus Urban County will continue to undertake efforts to build relationships between the Stanislaus Urban County and the development community to identify the barriers and constraints to the development of affordable housing to identify public/private partnership opportunities for the development of affordable housing.

Fee Structure: The Stanislaus Urban County will continue to review its fee systems as a means of reducing the cost of housing development. The Stanislaus Urban County members recognize that fees can affect the cost of construction of affordable housing in the community.

Subdivision Improvement Standards and Zoning Ordinance: The Stanislaus Urban County will review and provide input to modify Subdivision Improvements Standards, where reasonable and appropriate, to provide cost savings in the development of residential units while continuing to ensure the public health, safety, and welfare of residents.

Affordable Housing: The Stanislaus Urban County will continue to assign priority to educating the residents of Stanislaus County regarding the importance of providing affordable housing to support job growth. This will be done through public education, public participation, and fair housing information.

The Stanislaus Urban County and its member cities will continue to monitor constraints and where possible, undertake efforts that can address these constraints and their effect on the provision of affordable housing.

AP-85 Other Actions

Introduction

The Stanislaus Urban County and the City of Turlock, through the Consolidated Consortium Plan, targets Federal funds to residents who have traditionally not been served, or are underserved by programs. Project activities funded through the Consolidated Plan are carefully designed to provide appropriate and needed services, particularly to those who may not be eligible for assistance from other sources, or are geographically isolated by lack of transportation, or lack basic amenities, particularly medical care, in their neighborhoods.

Actions planned to address obstacles to meeting underserved needs.

One of the ongoing challenges in meeting the needs of the underserved is the lack of sufficient funding for services provided by local governments, non-profit organizations, and other agencies. Service providers faced with this challenge are expected to provide more and more services with the same, if not smaller, budgets every year. The Stanislaus Urban County and the City of Turlock will continue to seek funding opportunities through different sources, encourage projects or programs that leverage funds, and ensure that projects and programs are operated as effectively and efficiently as possible.

The Stanislaus Urban County and the City of Turlock will continue being an involved stakeholder in the CoC and the newly formed Stanislaus Homeless Alliance (SHA). These organizations both function to bring stakeholders and residents together to identify needs, service gaps, and potential solutions and partnerships to address housing and homelessness needs within the region.

The Housing Authority supports low- and moderate-income families throughout the region, and also play a key role in overcoming obstacles in meeting needs. Through working closely with the Housing Authority, Stanislaus Urban County and the City of Turlock, will continue to support the Housing Authority in their efforts to first identify needs and further meet those needs.

Actions planned to foster and maintain affordable housing.

As stated throughout the Con Plan and AAP, affordable housing is considered a high priority. Accordingly, the use of the HOME funding is prioritized for the development and rehabilitation of affordable housing

that serves low-income households. Affordable housing strategies include both development of new affordable housing units as well as the preservation/conservation of existing affordable housing units.

The Stanislaus Urban County relies on private non-profit organizations and for-profit developers to acquire, develop, or rehabilitate affordable units. The Stanislaus Urban County will continue to work closely with these entities to ensure that each year as many new affordable units are produced, or rehabilitated, as possible.

Actions planned to reduce lead-based paint hazards

The Housing Authority serves as the lead agency for the City of Turlock and Stanislaus Urban County in the identification, documentation, and prevention of lead poisoning. The Childhood Lead Poisoning Prevention Program of Stanislaus County, administered through the Housing Authority, becomes involved with childhood lead-based poisoning when notification of an elevated screening blood level is received either from the laboratory or physician. If the blood level is 10ug/dL (micrograms per deciliter), notification is made to the family. Once a child meets the case definition, an environmental investigation is performed by a Registered Environmental Health Specialist to determine, if possible, the source of lead exposure. The Housing Authority, in partnership with the Department of Environmental Resources, conducts the investigation of residences where children with elevated levels of lead reside.

Stanislaus Urban County and the City of Turlock partner with the Childhood Lead Poisoning Prevention Program to distribute information in the City and unincorporated areas of Stanislaus County and through members of the HOME Consortium. If the source of lead exposure is related to the residential physical environment (e.g., peeling paint that indicates the presence of lead), then the Housing Rehabilitation Program may participate in source eradication.

The Housing Authority actively addresses the issue of lead-based paint hazards by providing notices to landlords and tenants who participate in the Housing Choice Voucher Program, warning them of the hazards of lead-based paint. The City of Turlock and HOME Consortium Owner Occupied Housing Rehabilitation Loan Program and homebuyers who use HOME and CDBG fund are provided the notices by the member jurisdictions. Additionally, all units that are rehabilitated with CDBG and HOME funds are subject to lead-based paint compliance requirements.

Actions planned to reduce the number of poverty-level families

The City of Turlock, as lead entity of the HOME Consortium, and the Stanislaus Urban County work to reduce poverty through ensuring an adequate, affordable, quality housing supply, improving low-income neighborhoods, strengthening the employment skills of the community and ensuring access to basic needs such as food and shelter. The Home Consortium is particularly focused on ensuring quality housing options to low-income individuals through the production of new low-income units as well as the rehabilitation of existing low-income units and combating rental discrimination against minorities.

The City of Turlock and the Stanislaus Urban County updated the Analysis to Impediments to Fair Housing Choice (AI) alongside the development of the Fiscal Year 2020-2025 Consolidated Plan and outlined ways in which each jurisdiction can take actions to ensure protected classes have equitable access to quality schools and employers. The AI investigates zoning codes, permit processes, and fees to ensure all jurisdictions within Stanislaus County are as accommodating as possible to those developments and

employers that will contribute to reducing poverty and increasing economic opportunity and housing stability.

The CoC has developed into a more coordinated organization over the past five years, and the Stanislaus Urban County will continue to leverage those partnerships and resources to address the issues of poverty.

The Stanislaus County Alliance WorkNet (Alliance), The Community Services Agency's CalWorks Program, and the California Employment Development Department are all resources available to persons seeking employment.

In addition, all Urban County members, through their various economic development efforts, strive to promote activities that will ultimately have major impacts on the community, such as job creation that in turn will reduce poverty. The Alliance partners with Stanislaus County, Turlock and the other cities in fulfilling the following objectives:

- Promotion of Stanislaus County and its nine incorporated cities as a desirable location for new and expanding businesses.
- To work with public agencies and local businesses to promote cooperation in the economic development process.
- To assist in business retention and expansion efforts by offering programs for technical and financial assistance.

In 2019, Stanislaus County updated its Comprehensive Economic Development Strategy (CEDS). The development of the County CEDS was primarily conducted by the Economic Development Action Committee which included representative from all the Urban County members. Each of the Urban County members have outlined specific economic development goals. The entire report can be found at: <http://www.stancounty.com/ceo/econ-dev/pdf/ceds.pdf>. The Economic Development Action Committee has put forward several recommendations with regional objectives, they include:

- Encourage and support new business innovation and entrepreneurs
- Promote the region as a tourism destination
- Develop specialized education including higher education, career technical education, and workforce development
- The entire list of recommendation can be found on page 68 of the CEDS -> <http://www.stancounty.com/ceo/econ-dev/pdf/ceds.pdf>

Actions planned to develop institutional structure.

The Stanislaus Urban County publishes an annual Notice of Funding Availability (NOFA) of Community Development Block Grant (CDBG) and Emergency Solutions Grants (ESG) funds. The NOFA includes an announcement of a Grant Technical Workshop and timeline for the upcoming grant cycle. The NOFA is published in the local newspaper, The Modesto Bee, in English and Spanish. An e-mail is sent out to all past and current grantees and applicants that have applied in the last five (5) years. The Stanislaus Urban County also announces the NOFA at the CoC meeting, distributes a reminder, and e-mails the CoC agencies a NOFA announcement.

The Stanislaus Urban County holds a Grant Technical Workshop to release the upcoming grant application and explain the grant requirements. County staff is available via phone, in person, and by e-mail to answer questions throughout the application process.

The Stanislaus Urban County also requires those receiving grants (sub-grantees) to attend a Grantee Technical Workshop prior to receiving their agreements needing to be executed for release of funds. At the technical workshop, the policies, procedures, program regulations, requirements and obligations of the grant are explained. All sub-grantees receive the documents covered in the Grantee Technical Workshop in a hard copy and electronic copy.

Actions planned to enhance coordination between public and private housing and social service agencies.

Stanislaus County, as administrator of the Stanislaus Urban County, coordinates and consults with other program providers, local, state and federal government entities, non-profit and for-profit organizations and business, professional organizations, interest groups, and other parties interested in the implementation of federal programs.

Specifically, they are: Stanislaus Regional Housing Authority, Stanislaus County Health Services Agency, Stanislaus County Community Services Agency, Stanislaus County Behavioral Health and Recovery Services; California Department of Housing and Community Development; U.S. Department of Agriculture/Rural Development, U.S. Economic Development Administration, U.S. Department of Housing and Urban Development (HUD); California Coalition for Affordable Housing; Habitat for Humanity, Stanislaus County Affordable Housing Corporation (STANCO), California Rural Legal Assistance (CRLA), Great Valley Housing Corporation, Visionary Home Builders and Self-Help Enterprises. This will assure that the activities outlined in the AAP are given the fullest attention for design and implementation or construction.

Stanislaus County will continue to participate in regularly scheduled meetings with the cities of Modesto and Turlock to coordinate any CDBG, HOME and ESG funded activity that may be of benefit to each of the separate entitlement communities within Stanislaus County. Further, quarterly meetings will be held between the participating members of the Stanislaus Urban County. This will assure that the activities outlined in the AAP are given the fullest attention for design and implementation or construction.

The Stanislaus Urban County will maintain its membership and active involvement in the CoC, a multi-agency collaborative which focuses on the community's housing and social service needs, to continue outreach and information sharing with other Stanislaus County agencies serving similar clientele.

AP-90 Program Specific Requirements

Introduction

There are three specific goals of the Federal CDBG and HOME programs:

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

The Action Plan has been developed to assist in achieving these three goals. The overriding consideration required of the CDBG program is to benefit those members of the population that meet the definition of Targeted Income. A Targeted Income person is one who earns 80% or less of the AMI for CDBG funds. Additionally, if a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within the Targeted Income Group (TIG).

As identified by the Consolidated Plan for Fiscal Years 2020-2025, priority will be given to projects in the following areas: Infrastructure, Economic Development, Housing Assistance, Housing Programs, and Public Services.

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$1,200
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	\$1,200

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The Stanislaus Urban County adopted performance standards in line with HUD and HCD guidelines and in coordination of the CoC. These standards include: rapid re-housing clients into permanent housing within 30 days after determination of eligibility; retaining this housing for at least six months; attaining or maintaining income while in permanent housing. Agencies are strongly encouraged to use a progressive engagement with clients to determine their financial need and receive just enough assistance to maintain housing.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Stanislaus Urban County has worked with the local Continuum of Care (CoC) to further develop the Coordinated Entry System and include a larger scale of community participation. The CoC has established a working committee to implement this system to ensure compliance with the HEARTH Act. The recently updated (January 2020) Coordinated Entry System Policies and Procedures Manual can be found at: <https://csocstan.com/coordinated-entry-system-ces-policies-and-procedures-manual/>

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

For Fiscal Year 2019-2020, ESG funds were allocated based on a competitive grant cycle to which public service providers could apply for ESG funds. Applicants were restricted to submitting three (3) applications per agency for CDBG public services, provided each application is a request for a different program or site. All applicants were required to attend a Grant Technical Workshop prior to submission of an application. A panel made up of representation from the Stanislaus Urban County, the County's Chief Executive Office and the local Continuum of Care (CoC) reviewed each written application submission and oral presentation and scored them individually.

The following is the scoring criteria that were utilized for CDBG Public Services Grant and Emergency Solutions Grants (ESG) Program for Fiscal Year 2020-2021:

- Capacity & Experience
 - Agency & Staff Experience with Grant Administration
 - Program Sustainability Outlook
- Addressing the Need/Extent of the Problem
 - Prevention Focus
 - Consistent with Adopted Consolidated Plan Consistent/Priority Need
 - Identifying and Addressing a Community Need
- Collaboration
 - Does the Proposed Program Include Cross Sector Engagements?
 - Are there Partnerships and Collaborations?
 - Outreach and Referrals

- Accomplishments & Program Evaluation
 - Are Accomplishments Measurable?
 - Standardized Methods and Tools to Evaluate Progress
 - Are Goals Verifiable and Attainable?
 - Will Program be Impactful and Effective?
 - Financials
 - Clear and Efficient Budget
 - Leveraging Sources
 - Performance & Risk Assessment
 - Implementation- Soundness of Approach
 - Monitoring Results and Timeliness
 - Program Innovation
 - Grant Submittal
 - Is the Application Clear?
 - Presentation Value
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Stanislaus Urban County does consult with the local Continuum of Care which has formerly homeless individuals as members. Sub-grantees who administer the shelters and the rapid re-housing programs have formerly homeless individuals in their organizations who help shape policies and make decisions about services and programs that receive ESG funding.

5. Describe performance standards for evaluating ESG.

Under the Emergency Solutions Grants (ESG) Program, Stanislaus County staff reviews quarterly ESG statistical tables, narratives, Request for Funds forms and budget printouts, which identify the total funds uses/requested by each grantee during that reporting period. Stanislaus County staff verifies match funding (i.e. - local unrestricted donations). In this manner, the subrecipient in turn ensures that dollar to dollar matching requirements are satisfied by paying the remainder of the expenses from non-ESG sources.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>		
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text" value="E-20-UC-06-0100"/>
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>
State Use Only:		
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="County of Stanislaus"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="94-6000540"/>		* c. Organizational DUNS: <input type="text" value="0731367720000"/>
d. Address:		
* Street1: <input type="text" value="1010 10th Street, Suite #3400"/>		
Street2: <input type="text"/>		
* City: <input type="text" value="Modesto"/>		
County/Parish: <input type="text" value="Stanislaus"/>		
* State: <input type="text" value="CA: California"/>		
Province: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code: <input type="text" value="95354-000"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="Planning and Community Develop"/>		Division Name: <input type="text" value="Community Development"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Angela"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Freitas"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Director, Planning and Community Development"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="209-525-6330"/>		Fax Number: <input type="text" value="209-525-5911"/>
* Email: <input type="text" value="Angela@stancounty.com"/>		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-231

CFDA Title:

Emergency Solutions Grants Program

*** 12. Funding Opportunity Number:**

14-231

* Title:

Emergency Solutions Grants Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Stanislaus County's Annual Action Plan for FY 2020-2021 that includes \$202,628 in ESG funds for the delivery of homeless prevention, rapid re-housing, HMIS data support, shelter and administration.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="202,628.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="202,628.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.



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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director, Planning and Community Development
APPLICANT ORGANIZATION County of Stanislaus	DATE SUBMITTED 

Standard Form 424B (Rev. 7-97) Back

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director, Planning and Community Development
APPLICANT ORGANIZATION County of Stanislaus	DATE SUBMITTED 

SF-424D (Rev. 7-97) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>		
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: B-20-UC-06-0100
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text"/>
State Use Only:		
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="County of Stanislaus"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="94-6000540"/>		* c. Organizational DUNS: <input type="text" value="3731367720000"/>
d. Address:		
* Street1: <input type="text" value="1010 10th Street, Suite 3400"/>		
Street2: <input type="text"/>		
* City: <input type="text" value="Modesto"/>		
County/Parish: <input type="text" value="Stanislaus"/>		
* State: <input type="text" value="CA: California"/>		
Province: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code: <input type="text" value="95354-000"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="Planning and Community Develop"/>		Division Name: <input type="text" value="Community Development"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Ms."/>		* First Name: <input type="text" value="Angela"/>
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Freitas"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Director, Planning and Community Development"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="209-525-6330"/>		Fax Number: <input type="text" value="209-525-5911"/>
* Email: <input type="text" value="Angela@stancounty.com"/>		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

Entitlement Community Development Block Grant Program

*** 12. Funding Opportunity Number:**

14-218

* Title:

Entitlment Community Development Block Grant Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Stanislaus Urban County's Annual Action Plan for FY 2020-2021 that included \$2,310,165 in CDBG funds for activities such as Public Services, Fair Housing, Infrastructure and Administration

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="2,310,165.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="2,310,165.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.



PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
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12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director, Planning and Community Development
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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Director, Planning and Community Development
APPLICANT ORGANIZATION	DATE SUBMITTED
County of Stanislaus	

SF-424D (Rev. 7-97) Back

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to 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, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2020, 2021 and 2022 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official

Date

Title

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to 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 and other financial resources are not available to meet such needs.

Signature/Authorized Official

Date

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official

Date

Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Public Service Grant (PSG) and Emergency Solutions Grants (ESG) Program
Requests FY 2020-2021
Applications Received and Recommended Awards

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PUBLIC SERVICE GRANTS										
RANKING	SCORE	AGENCY	PROGRAM NAME	PROGRAM TYPE	FOCUS AREA*	GRANT	OTHER FUNDING	OTHER FUNDING AMOUNT	AMOUNT REQUEST	FUNDING RECOMMENDATION
1	148.11	Court Appointed Special Advocates (CASA) of Stanislaus County	Direct Services Project	Case Management	County-wide	PSG	Judicial Council Grant and Fundraising	\$ 155,100.00	\$ 25,000.00	\$ 25,000.00
2	140.09	Center for Human Services (CHS)	Ceres Partnership Concrete Support In Times of Need	Utility Assistance, Emergency Food Assistance and Case Management	CE, UN	PSG	First Five - Family Resource Center, CHS Fundraising and Donations	\$ 283,702.00	\$ 25,000.00	\$ 25,000.00
3	140.56	Center for Human Services (CHS)	Oakdale Family Resource Center - Crisis Support Program	Utility Assistance, Emergency Food Assistance and Case Management	QA, UN	PSG	First Five - Family Resource Center, CHS Fundraising and Donations	\$ 271,601.00	\$ 25,000.00	\$ 25,000.00
4	139.89	Children's Crisis Center (CCC)	Single Parent Intervention Services @ Marsha's House	Utility Assistance, Emergency Food Assistance and Case Management	County-wide	PSG	California Dept. of Education, Federal Childcare Food Program and Fundraising	\$ 212,145.00	\$ 24,984.00	\$ 24,984.00
5	138.78	Children's Crisis Center (CCC)	Single Parent Intervention Services @ Guardian House	Emergency Shelter and Case Management	County-wide	PSG	California Dept. of Education, Federal Childcare Food Program, Guardian Fund and Fundraising	\$ 281,074.00	\$ 24,984.00	\$ 24,984.00
6	138.56	United Samaritans Foundation (USF)	Daily Bread Mobile Lunch Program- Westside	Emergency Food Assistance	NE, PA, UN	PSG	Rental Income, Fundraising and Private Donation	\$ 37,167.00	\$ 20,000.00	\$ 20,000.00
7	138.22	Children's Crisis Center (CCC)	Single Parent Intervention Services @ Verda's House	Emergency Shelter and Case Management	County-wide	PSG	California Dept. of Education, Federal Childcare Food Program and Fundraising	\$ 212,145.00	\$ 24,984.00	\$ 24,984.00
8	136.72	The Salvation Army Red Shield (SARS)	At Risk Teen Program	Education and Recreational Services	UN	PSG	Kidz Day Fundraiser and Private Donations	\$ 46,831.00	\$ 25,000.00	\$ 25,000.00
9	135.11	United Samaritans Foundation (USF)	Daily Bread Mobile Lunch Program- Hughson	Emergency Food Assistance	HU, WA, UN	PSG	Rental Income, Fundraising and Private Donations	\$ 37,167.00	\$ 20,000.00	\$ 20,000.00
10	133.28	Center for Human Services (CHS)	Westside Family Resource Center - Supportive Services	Utility Assistance, Emergency Food Assistance and Case Management	NE, PA, UN	PSG	First Five - Family Resource Center, CHS Fundraising and Donations	\$ 481,181.00	\$ 25,000.00	\$ 16,065.00

**Public Service Grant (PSG) and Emergency Solutions Grants (ESG) Program
Requests FY 2020-2021**

Applications Received and Recommended Awards										
11	132.00	<i>The Salvation Army Red Shield (SARS)</i>	Athletic and Fitness Program	<i>Recreational Services</i>	CE, UN	PSG	<i>Kidz Day Fundraiser</i>	\$ 8,839.00	\$ 25,000.00	\$ -
12	130.94	<i>Disability Resource Agency for Independent Living (DRAIL)</i>	Assistive Technology Program	<i>Health Services</i>	County-wide	PSG	<i>CA Department of Rehabilitation</i>	\$ 22,519.00	\$ 20,000.00	\$ -
13	130.56	Parent Resource Center (PRC)	Families First and More	<i>Education, Counseling and Case Management</i>	UN	PSG	<i>Community Services Agency and Health Services Agency</i>	\$ 102,598.00	\$ 25,000.00	\$ -
14	129.06	The Salvation Army Red Shield (SARS)	After School Homework Program	Homework Program	CE, UN	PSG	<i>Georgia Triplett Trust, Kidz Day and Christmas Kettles Fundraising Events</i>	\$ 37,800.48	\$ 25,000.00	\$ -
15	128.06	Haven's Women's Center	Emergency Shelter Program	<i>Emergency Shelter and Case Management</i>	County-wide	PSG	<i>Office of Emergency Services, City of Modesto CDBG</i>	\$ 1,073,325.00	\$ 24,710.00	\$ -
16	121.11	United Samaritans Foundation (USF)	The Next Chapter	Homeless Services	HU, WA, UN	PSG	<i>Walmart Grant, Donations and Fundraising</i>	\$ 12,500.00	\$ 12,500.00	\$ -
Total PSG Grant Amounts Requested/Recommended for Award								\$ 3,275,694.48	\$ 372,162.00	\$ 231,017.00

* Ceres - CE; Hughson - HU; Newman - NE; Oakdale - OA; Patterson - PA; Turlock - TU; Waterford - WA; Unincorporated - UN

Bold, Italic, and Shaded = Recommended for Funding

Public Service Grant (PSG) and Emergency Solutions Grants (ESG) Program
Requests FY 2020 - 2021
Applications Received and Recommended Awards

EMERGENCY SOLUTIONS GRANTS (ESG)										
RANKING	SCORE	AGENCY	PROGRAM NAME	PROGRAM TYPE	FOCUS AREA*	GRANT	OTHER FUNDING	OTHER FUNDING AMOUNT	AMOUNT REQUEST	FUNDING RECOMMENDATION
N/A	N/A	Stanislaus County	Program Administration	Administration	County-wide	ESG	Housing and Urban Development	N/A	N/A	\$ 15,197.00
1	158.33	Family Promise of Greater Modesto	Shelter to Solutions Program	Emergency Shelter, Rapid Re-Housing and Homeless Prevention	County-wide	ESG	Housing and Urban Development, Private Donations, Fundraising, Housing and Community Development, Rental Income	\$ 375,000.00	\$ 118,000.00	\$ 144,602.00
2	157.00	We Care Program - Turlock	We Care Program Emergency Shelter	Emergency Shelter	County-wide	ESG	Housing and Urban Development, Private Donations, Fundraising, Housing and Community Development, Rental Income	\$ 342,944.00	\$ 120,000.00	\$ 33,832.00
3	155.94	Community Housing and Shelter Services (CHSS)	HHS Data Support	his	County-wide	ESG	Fundraising and Donations	\$ 15,000.00	\$ 15,000.00	\$ 9,197.00
Total ESG Grant Amounts Requested/Recommended for Award								\$ 732,944.00	\$ 253,000.00	\$ 202,628.00
Total All Grant Amounts Requested/Recommended for Award								\$ 2,295,947.61	\$ 767,940.68	\$ 439,053.00

* Ceres - CE; Hughson - HU; Newman - NE; Oakdale - OA; Patterson - PA; Turlock - TU; Waterford - WA; Unincorporated - UN

Bold, Italic, and Shaded = Recommended for Funding

STANISLAUS URBAN COUNTY & CITY OF TURLOCK

**FISCAL YEAR 2020-2025 CONSORTIUM
CONSOLIDATED PLAN**

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

**FISCAL YEAR 2020-2025 REGIONAL ANALYSIS OF
IMPEDIMENTS TO FAIR HOUSING**

2020-2025 STANISLAUS URBAN COUNTY



2020-2025 REGIONAL APPROACH

Stanislaus Urban County:

- **CDBG** – Community Development Block Grant
- **ESG** – Emergency Solutions Grant

City of Turlock/Stanislaus County HOME Consortium:

- **HOME** – HOME Investment Partnership Program

City of Turlock:

- **CDBG** – Community Development Block Grant

PLAN DEVELOPMENT AND CITIZEN PARTICIPATION

- Community Meetings
- Stakeholder Outreach
- Online & Print Survey
- Municipal Advisory Councils
- City Councils & Staff of Member Jurisdictions
- County's Community Development Committee

FISCAL YEAR 2020-2025 CONSORTIUM CONSOLIDATED PLAN

- Describes and discusses priority needs of the community – focusing on housing and community development needs;
- Identifies the resources available to address those needs; and
- Describes a plan to meet those needs using HUD funds.

FISCAL YEAR 2020-2025 CONSORTIUM CONSOLIDATED PLAN

CDBG Program Goals:

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

FISCAL YEAR 2020-2025 CONSORTIUM CONSOLIDATED PLAN

Identified Needs and Priorities:

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

FISCAL YEAR 2020-2025 CONSORTIUM CONSOLIDATED PLAN

Identified Goals:

- Increase and improve supply of affordable housing
- Work to end and prevent homelessness
- Improve infrastructure and public facilities
- Provide public services
- Community emergency response
- Administration

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

- Component of Consolidated Plan.
- Describes the specific programs and projects to be undertaken during the upcoming fiscal year.

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Stanislaus Urban County Allocation:

CDBG: \$2,310,165*

ESG: \$ 202,628**

TOTAL \$2,512,793

* reflects \$4,106 increase compared to FY 2019-2020

** reflects \$214 decrease compared to FY 2019-2020

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

CDBG AND ESG FINAL ALLOCATIONS

URBAN COUNTY MEMBER	ACTIVITIES	ADMINISTRATION	TOTAL
Ceres	\$219,870	\$13,797	\$233,667
Hughson	\$165,187	\$13,797	\$178,984
Newman	\$152,110	\$13,797	\$165,907
Oakdale	\$170,901	\$13,797	\$184,698
Patterson	\$183,508	\$13,797	\$197,305
Riverbank	\$147,549	\$13,797	\$161,346
Waterford	\$223,726	\$13,797	\$237,523
Stanislaus County	\$238,756	\$340,455	\$579,211
Public Services @15%	\$346,524		\$346,524
Fair Housing		\$25,000	\$25,000
CDBG Total	\$1,848,131	\$462,034	\$2,310,165
ESG Total	\$187,431	\$15,197	\$202,628
TOTAL ALLOCATION	\$2,035,562	\$477,231	\$2,512,793

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Urban County Member Infrastructure Projects:

- Stanislaus County: West Modesto Infrastructure and Empire Sidewalk Project
- City of Ceres: Morrow Village Area Improvements Project
- City of Hughson: Walker Lane Project
- City of Oakdale: Wood Basin Improvement Project

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Urban County Member Infrastructure Projects:

- City of Riverbank: Castleberg Park and Pioneer Park Improvement Projects
- City of Patterson: Washburn Infrastructure Project
- City of Waterford: Main Street Infrastructure Project
- * City of Newman: Hill Park and Steffensen Park Areas Projects

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Fair Housing Program:

- HUD mandated, aimed at combating fair housing impediments through education, investigation, and litigation

Economic Development:

- Small Business Assistance Program (COVID 19 Relief)

Community Emergency Response Program:

- COVID 19 Relief Assistance Activities

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Public Service Funds:

- 10% (\$231,016) of CDBG allocation set aside for public services
- 5% (\$115,508) of CDBG allocation set aside for economic development activities

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Competitive Award Scoring Criteria:

- Capacity & Experience
- Need/Extent of the Problem
- Soundness of Approach
- Methodology
- Accomplishments
- Funding Resources
- Achievement Results & Program Evaluation
- Grant Submittal (*Accuracy, Completeness, and Quality*)

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Public Services Grants (PSG)

- Received 16 competitive applications(\$372,162)
- Ten recommended for funding (\$231,017)
 - Court Appointed Special Advocates (CASA)
 - Center for Human Services (3 grants)
 - Children's Crisis Center (3 grants)
 - Salvation Army Red Shield
 - United Samaritans Foundation (2 grants)

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

Emergency Solutions Grants (ESG)

- Received 3 competitive applications (\$253,000)
- 3 recommended for funding (\$202,628)

FISCAL YEAR 2020-2021 ANNUAL ACTION PLAN

ESG funding recommendations:

- **Community Housing and Shelter Services: \$9,197**
 - Homeless Management Information System Data Support
- **Family Promise: \$144,602**
 - Homeless Prevention and Rapid Re-Housing
 - Shelter Services and Operations
 - Homeless Management Information System Data Support
- **We Care Program: \$33,632**
 - Shelter Services and Operations

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Purpose:

- Determine current state of fair housing.
- Examine conditions that may impact equal access to housing.
- Identify “impediments” to fair housing.
- Develop a strategy to address fair housing challenges.

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Key Findings of Fair Housing Challenges:

1. Affordability and Costs: high cost of housing, lack of affordable housing, application fee, deposits and up-front costs.
2. Income: Low wages, people on fixed-incomes, and Section 8 Vouchers.
3. Price-setting: Profit-driven sensibility of landlords
4. Supply and Demand: Short supply of affordable housing, and limits on new housing developments, shortage of farmworker housing, lack of housing for students, long waitlists for housing units.

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

- Analysis of Impediments includes planned actions to address each impediment.
- The identification of an impediment does not necessarily identify a deficiency but rather the nature of a problem that the recommended actions will serve to mitigate.

STAFF RECOMMENDATIONS

- Close 30 day Public Review Period
- Conduct Public Hearing
- Approvals
 - CEQA Notice of Exemption
 - Fiscal Year 2020-2025 Consortium Consolidated Plan
 - Fiscal Year 2020-2021 Annual Action Plan
 - Fiscal Year Regional Analysis of Impediments to Fair Housing

STAFF RECOMMENDATIONS

- Authorizations
 - Authorize Director of Planning and Community Development to sign HUD Program Certifications.
 - Authorize Chief Executive Officer to sign CDBG and HOME Sub-Recipients Agreements.
 - Authorize Director of Planning and Community Development to sign any related HUD agreements, contracts or documentation needed for implementation.
 - Authorize staff to document any feedback received and incorporate any changes as required by HUD.
 - Authorize staff to submit to HUD final documents.

QUESTIONS

