

STANISLAUS URBAN COUNTY AND CITY OF TURLOCK

REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

FISCAL YEARS 2015–2020

MAY 2015



STANISLAUS URBAN COUNTY/ CITY OF TURLOCK



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REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FISCAL YEARS 2015 – 2020

MAY 2015

Stanislaus County
1010 10th Street
Suite 6700
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City of Ceres
2720 2nd Street
Ceres, CA 95307



City of Hughson
7018 Pine Street
Hughson, CA 95326



City of Newman
938 Fresno Street
Newman, CA 95360



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



City of Patterson
1 Plaza
Patterson, CA 95363



City of Turlock
156 S Broadway
Turlock, CA 95380



City of Waterford
312 E Street
Waterford, CA 95386



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Executive Summary

Purpose and Intent

An Analysis of Impediments to Fair Housing Choice, or “AI,” is a requirement imposed on recipients of certain Federal grants from the U.S. Department of Housing and Urban Development (HUD). The Stanislaus Urban County and City of Turlock receive an annual entitlement of Community Development Block Grant (CDBG) funds from HUD. The regulations that govern these grants (Title 24 Code of Federal Regulations, Part 91) require that each HUD grantee certify as a condition of its grant that the grantee is “affirmatively furthering fair housing.” This includes (1) conducting an analysis of impediments to fair housing choice; (2) taking appropriate actions to overcome the effects of impediments identified through that analysis; and (3) maintaining records reflecting the analysis and actions.

This document is the Stanislaus Urban County and City of Turlock’s first regional AI. This AI adheres to the recommended scope of analysis and format in the *Fair Housing Planning Guide* developed by HUD (1996).

HUD defines the AI as “a comprehensive review of a state’s or entitlement jurisdiction’s laws, regulations and administrative policies, procedures and practices. The AI involves an assessment of how these laws, regulations, policies and procedures affect the location, availability, and accessibility of housing, and how conditions, both private and public, affect fair housing choice.”¹

This review and assessment is used to identify actions that jurisdictions will take to improve fair housing. The format of the AI is such that each action is associated with a concern or issue. These are described as “impediments.” HUD formally defines an impediment to fair housing as “any action, omission, or decision that is intended to or has the effect of restricting a person’s choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin.”²

The framework of impediments and actions is to be used by the jurisdiction to plan its annual actions and to report on actions taken to improve fair housing. This work is accomplished in the Annual Action Plan and in the Consolidated Annual Performance and Evaluation Report (CAPER), respectively.

Although the AI is not required as part of the annual submission to HUD, HUD recommends that each jurisdiction regularly update its AI. HUD has suggested that the AI be conducted at least as often as the Consolidated Plan, which is required every five years. The Stanislaus Urban County and City of Turlock’s current Consolidated Plans are valid through June 2015.

Preparation of the AI

Stanislaus County commissioned PMC to conduct and draft this regional AI through a competitive process for the preparation of the Fiscal Year 2015-2020 Stanislaus Urban County / City of Turlock Regional Consolidated Plan. PMC is a private consulting firm and has successfully prepared various other city and county AIs and Consolidated Plans.

The research, analysis, and consultations required to complete the AI commenced in August 2014. The project was substantially complete by the end of March 2015.

¹ HUD Memorandum, “Analysis of Impediments to Fair Housing Choice Reissuance,” September 8, 2004.

² U.S. Department of Housing and Urban Development, *Fair Housing Planning Guide*, March 1996.

During October 2014, Stanislaus County held public workshops to discuss the AI process and to gather public comment on the state of fair housing and possible impediments. The workshop public notice and notes from the workshop are provided as an attachment to the AI.

On March 31, 2015, Stanislaus County and City of Turlock published the draft AI for public review and comment.

On April 28, 2015, the Turlock City Council held a public hearing to consider adoption of the final AI.

On May 5, 2015, the Stanislaus County Board of Supervisors held a public hearing to consider adoption of the final AI.

All public comments received and responses to those comments are provided as an attachment to the AI.

Geographic Terms

Throughout this document, the following geographic terms may be used. To assist the reader, an explanation of each is provided below.

- ◆ **Stanislaus County (countywide):** Includes all cities in Stanislaus County as well as the unincorporated area of the County.
- ◆ **Stanislaus Urban County:** Includes the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford and the unincorporated balance area of the County (the unincorporated area less the CDBG entitlement cities of Modesto and Turlock and the non-entitlement city of Riverbank). Stanislaus County is the lead entity for the Stanislaus Urban County.
- ◆ **Unincorporated County:** Includes the entire unincorporated area of Stanislaus County (this area is not a part of any municipality).
- ◆ **Entitlement Cities:** The CDBG entitlement cities in Stanislaus County are Modesto and Turlock.
- ◆ **HOME Consortium:** The members of the HOME Consortium are the Stanislaus Urban County and the City of Turlock. The City of Turlock is the lead entity for the HOME Consortium.

Impediments Identified

The AI identified the impediments listed below. The last section of the AI, "Identification of Impediments and Actions to Address," provides detail regarding the impediments identified and describes the planned actions to address those impediments.

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

In addition, State law requires local jurisdictions in California to assess barriers to affordable housing as part of the General Plan's Housing Element. Programs to address impediments to fair housing may be addressed through the implementation of the Housing Element.

Affordable Housing

1. **Impediment: Insufficient supply of affordable housing.**
 - 1.1 **Action:** Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.
 - 1.2 **Action:** Continue to offer regulatory relief and incentives for the development of affordable housing.
 - 1.3 **Action:** Continue to ensure the availability of adequate sites for the development of affordable housing.
2. **Impediment: Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.**
 - 2.1 **Action:** Continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of lower-income households.
 - 2.2 **Action:** Continue to support the Stanislaus Housing Authority Section 8 Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at the public counters for the Stanislaus County Department of Planning and Community Development, City of Turlock Housing Services, and all Stanislaus Urban County member jurisdictions. Stanislaus County and the City of Turlock will hold periodic meetings with representatives of the Housing Authority of the County of Stanislaus to discuss actions Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions can take to coordinate housing program implementation.
 - 2.3 **Action:** Follow through on Housing Element policies and programs.

Private Practice and Mortgage Lending

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

- 4.2 **Action:** Encourage Realtors to seek fair housing training.

Fair Housing Education and Enforcement

5. **Impediment: Limited knowledge of fair housing rights.**

- 5.1 **Action:** Conduct more outreach to educate tenants, and owners and agents of rental properties, regarding their fair housing rights and responsibilities.

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

6. **Impediment: Discrimination in rental housing.**

- 6.1 **Action:** Support efforts to enforce fair housing rights and to provide redress to persons who have been discriminated against.

- 6.2 **Action:** Support efforts to increase the awareness of discrimination against all Federal and State protected classes.

Government Barriers

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

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

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

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

Introduction

As recipients of funds from the U.S. Department of Housing and Urban Development (HUD), the Stanislaus Urban County and City of Turlock are required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to periodically review that analysis and update it as necessary. This AI was completed in concert with the Fiscal Year 2015-2020 Stanislaus Urban County/ City of Turlock Regional Consolidated Plan (Con Plan). The AI will be reassessed and reevaluated with each Consolidated Plan.

The Stanislaus Urban County and City of Turlock developed an established five-year Consolidated Plan yet each has a distinct process to request funding and to evaluate requests for funds. The joint collaboration maximizes the impact of available resources and ensures a more efficient distribution of funds. This is most notable in the provision of countywide services and the ability to fund large housing projects that might be beyond the capacity of any single jurisdiction.

This AI is one of several ways in which Stanislaus Urban County and the City of Turlock are fulfilling their obligation to affirmatively further fair housing. This AI includes an analysis of local factors that may impact fair housing choice, the identification of specific impediments to fair housing choice, and a plan to address those impediments. The Stanislaus Urban County and City of Turlock must also ensure equal access to the services and programs it provides or assists.

The Stanislaus Urban County and City of Turlock each prepare its own Consolidated Annual Performance Evaluation Report (CAPER). These CAPERs include a description of the efforts made each year to affirmatively further fair housing. These documents may be consulted for an evaluation of actions taken by the Stanislaus Urban County and City of Turlock.

Geography

Stanislaus County, along with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford, form what is known as the Stanislaus Urban County. The Stanislaus Urban County is an entitlement jurisdiction and receives Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) entitlement funds from HUD on an annual basis based on a formula allocation. Similarly, the City of Turlock is an entitlement jurisdiction of its own and receives HOME Investment Partnerships (HOME) Program funds on behalf of the HOME Consortium (which includes the Stanislaus Urban County members) as well as its own CDBG formula allocation. The City of Turlock is not a recipient of ESG entitlement funds.

Stanislaus County is recognized as the lead entity for the County CDBG and ESG funds and the City of Turlock is recognized as the lead entity for HOME funds and manages its own CDBG funds. The Stanislaus Urban County will be entering its fourteenth year as an entitlement jurisdiction for CDBG and its twelfth year as a recipient of ESG funds. The City of Turlock will be entering its thirty-first year as a CDBG entitlement jurisdiction and its fifteenth year as the lead agency for the City of Turlock/Stanislaus County HOME Consortium.

What Is Fair Housing?

Federal law prohibits discrimination in the provision of housing or access to housing based on membership in certain protected classes of persons or personal status. These protections apply to race, color, national origin or ancestry, sex, religion, familial status, and mental and physical handicap (disability).

California State law codifies the Federal protections and adds sexual orientation, marital status, use of language, source of income, HIV/AIDS, and medical condition. State law also prohibits discrimination based on any arbitrary status (the Unruh Act).

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, education, employment, or other goals. Federal and State fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on a person's protected status.

Fair housing is a condition in which individuals of similar income levels in the same housing market have a like range of choice available to them, regardless of personal status.

What Is an Impediment to Fair Housing Choice?

As defined by the HUD *Fair Housing Planning Guide* (1996), impediments to fair housing choice are:

- ◆ Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or
- ◆ Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.

To affirmatively further fair housing, a community must work to remove impediments to fair housing choice.

Purpose of the Analysis of Impediments

The purpose of an AI is to review conditions in the jurisdiction that may impact the ability of households to freely choose housing and to be treated without regard to race, ethnicity, religion, gender, national origin, source of income, age, disability, or other protected status. The AI reviews the general state of fair housing, the enforcement of fair housing law, efforts to promote fair housing, access to credit for the purpose of housing, and general constraints to the availability of a full range of housing types.

An AI examines the affordability of housing in the jurisdiction, with an emphasis on housing affordable to households with annual incomes classified as low income and less. (Low income is defined as equal to or less than 80 percent of the adjusted area median income as most recently published by HUD.)

The document has three major goals:

- ◆ To provide an overview of the Stanislaus Urban County and the City of Turlock and current conditions as they impact fair housing choice.
- ◆ To review the policies and practices of the Stanislaus Urban County and the City of Turlock as they impact fair housing choice and the provision of housing, specifically affordable housing and housing for special needs households.
- ◆ To identify impediments to fair housing choice and actions the Stanislaus Urban County and the City of Turlock will take to remove those impediments or to mitigate the impact those impediments have on fair housing choice.

Fulfilling these goals includes the following:

- ◆ A review of the laws, regulations, and administrative policies, procedures, and practices of the HOME Consortium.
- ◆ An assessment of how those laws affect the location, availability, and accessibility of housing.
- ◆ An assessment of conditions, both public and private, affecting fair housing choice.

Fiscal Year 2015-2020 Stanislaus Urban County/ City of Turlock Regional Consolidated Plan (Con Plan)

This AI has been prepared in coordination with Con Plan for the Stanislaus Urban County and the City of Turlock. The Con Plan outlines the Stanislaus Urban County and City of Turlock's priority housing and community development needs, as well as the objectives and strategies for meeting those needs. The Con Plan is a requirement of recipients of housing and community development funds from HUD.

One of the major focuses of the Con Plan is the provision of affordable housing opportunities for lower-income households and persons with special needs, many of whom may be victims of housing discrimination. As part of the Con Plan, the Stanislaus Urban County and the City of Turlock must certify that they are affirmatively furthering fair housing choice for all residents by:

- ◆ Conducting an analysis to identify impediments to fair housing choice;
- ◆ Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and
- ◆ Maintaining records reflecting the analysis and actions taken.

This AI constitutes the Stanislaus Urban County and the City of Turlock's efforts to identify impediments to fair housing and actions to overcome the effects of the identified impediments. Through the annual planning process, both jurisdictions will incorporate specific actions to be undertaken to remove impediments and to further fair housing choice.

Background

This section presents a summary of the demographic profile, economic, income distribution, and housing characteristics for the Stanislaus Urban County and the City of Turlock.

Population

Tables 1 and 2 demonstrate a few notable growth trends in the Stanislaus Urban County and the City of Turlock. The actual annual percentage growth rate from 2000 to 2010 increased with respect to the actual annual growth percentage rate from 1990 to 2000 for the Stanislaus Urban County.

As related to the population from 2000 to 2010, the actual growth percentage rate in the City of Turlock (28.2 percent), Ceres (37.9 percent), Hughson (83.7 percent), Newman (60.1 percent), Oakdale (38.3 percent), Patterson (86.3 percent), and Waterford (24.8 percent) exceeds the percentage growth for the Stanislaus Urban County (21.8 percent) as a whole, with the exception of the Unincorporated County (3.3 percent).

The Stanislaus Council of Governments (StanCOG) projected that the population in the Stanislaus Urban County would reach 239,883 by 2015 and increase to 260,225 by 2020. Between 2010 and 2015, Stanislaus Urban County's population was estimated to grow by 8.3 percent. The year 2000 population data source in Table 1 is the Department of Finance. The data in the Con Plan Needs Assessment Table NA-1 comes from the 2007-2011 CHAS which is different than the AI data in Table 1. The Con Plan data is from the IDIS data download. Table 1 below also includes projections. All of the population data works together in the table. The source cannot be changed to match the source in Con Plan Table NA-1, nor vice versa.

Table 1
Current and Projected Population

| Jurisdiction | 1990 | 2000 | 2010 | 2015 | 2020 |
|--|---------|---------|---------|---------|---------|
| Stanislaus Urban County | | | | | |
| Ceres | 26,314 | 32,928 | 45,417 | 50,069 | 55,379 |
| Hughson | 3,259 | 3,615 | 6,640 | 7,012 | 7,437 |
| Newman | 4,151 | 6,385 | 10,224 | 11,648 | 13,274 |
| Oakdale | 11,961 | 14,952 | 20,675 | 22,908 | 25,457 |
| Patterson | 8,626 | 10,959 | 20,413 | 25,065 | 30,375 |
| Waterford | 4,771 | 6,776 | 8,456 | 9,409 | 10,496 |
| Unincorporated Area of Stanislaus County | 95,756 | 106,741 | 110,236 | 113,772 | 117,807 |
| Entitlement Jurisdictions | | | | | |
| Turlock | 42,198 | 53,481 | 68,549 | 74,983 | 82,328 |
| Stanislaus Urban County Total | 154,838 | 182,356 | 222,061 | 239,883 | 260,225 |

Source: Department of Finance 1990, 2000; StanCOG RTP 2010, 2015, 2020

Table 2
Rate of Change in Current and Projected Population

| Jurisdiction | 1990 to 2000 | | 2000 to 2010 | | 2010 to 2015 | |
|--|---------------|--------------|---------------|--------------|---------------|--------------|
| | Annual Growth | Total Growth | Annual Growth | Total Growth | Annual Growth | Total Growth |
| Stanislaus Urban County | | | | | | |
| Ceres | 2.5% | 25.1% | 3.8% | 37.9% | 1.0% | 10.2% |
| Hughson | 1.1% | 10.9% | 8.4% | 83.7% | 0.6% | 5.6% |
| Newman | 5.4% | 53.8% | 6.0% | 60.1% | 1.4% | 13.9% |
| Oakdale | 2.5% | 25.0% | 3.8% | 38.3% | 1.1% | 10.8% |
| Patterson | 2.7% | 27.0% | 8.6% | 86.3% | 2.3% | 22.8% |
| Waterford | 4.2% | 42.0% | 2.5% | 24.8% | 1.1% | 11.3% |
| Unincorporated Area of Stanislaus County | 1.1% | 11.5% | 0.3% | 3.3% | 0.3% | 3.2% |
| Entitlement Jurisdictions | | | | | | |
| Turlock | 2.7% | 26.7% | 2.8% | 28.2% | 0.9% | 9.4% |
| Stanislaus Urban County Total | 1.8% | 17.8% | 2.2% | 21.8% | 0.8% | 8.0% |

Source: Department of Finance 1990, 2000; StanCOG RTP 2010, 2015, 2020

Population by Age

Table 3 shows population by age group. Of the jurisdictions in the Stanislaus Urban County, Oakdale had the largest share of persons over 65 (12.4 percent), followed by the City of Turlock (11.7 percent) and Hughson (10.8 percent). Patterson had the largest percentage of persons under the age of 19 (37.3 percent), followed by Waterford (36.6 percent). The Unincorporated Area of Stanislaus County had the largest share of persons between 19 and 64 (61.9 percent).

Table 3
Population by Age

| Jurisdiction | Percentage of Persons Under 19 | Percentage of Persons Over 19 | Percentage of Persons Age 19–64 | Percentage of Persons Over 65 |
|--|--------------------------------|-------------------------------|---------------------------------|-------------------------------|
| Stanislaus Urban County | | | | |
| Ceres | 35.8% | 64.2% | 56.4% | 7.8% |
| Hughson | 34.1% | 66.0% | 55.2% | 10.8% |
| Newman | 35.5% | 64.6% | 56.0% | 8.6% |
| Oakdale | 30.6% | 69.5% | 57.1% | 12.4% |
| Patterson | 37.3% | 62.9% | 56.6% | 6.3% |
| Waterford | 36.6% | 63.6% | 56.2% | 7.4% |
| Unincorporated Area of Stanislaus County | 32.1% | 72.7% | 61.9% | 10.8% |
| Entitlement City | | | | |
| Turlock | 30.9% | 69.1% | 57.4% | 11.7% |

Source: 2010 U.S. Census

Note: Due to rounding, total percentage of persons for individual jurisdictions may not equal 100.

Although the Stanislaus Urban County is generally diverse, the particular racial and ethnic composition varies by community. Please see **Tables 4 and 5.**³ Of the six cities in the Stanislaus Urban County, Oakdale is the only one with a White population of over 80 percent (80.1), and none have a racial minority⁴ population near or greater than 50 percent.

It can also be noted that three communities have a Hispanic population (all races) over 50 percent (Ceres, Newman, and Patterson).

Areas of Minority Concentration

Data on race and ethnicity were examined at the block group level to determine areas of minority and ethnic concentration (2010 U.S. Decennial Census, Summary File 3). Minority population is defined as the total population less those who responded “White alone” to the U.S. Census. Census tract areas where the percentage of total minority population exceeds the group’s countywide total percentage by at least one percentage point are considered to be areas of “minority concentration.” Areas that have a minority population at least 1.5 times the countywide total percentage are considered to be areas of “high minority concentration.” Please see **Map 2 in Appendix 1.**

Areas showing an overall minority concentration include unincorporated areas north of Modesto, which includes Salida, unincorporated areas east of Ceres, northwestern and southern portions of the City of Turlock, western portions of Patterson, and unincorporated areas south of Patterson.

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

Table 4
Race as a Percentage of Total Population

| Jurisdiction | White | Black or African American | American Indian or Alaskan Native | Asian | Native Hawaiian and Other Pacific Islander | Some Other Race | Two or More Races |
|--------------------------------|-------|---------------------------|-----------------------------------|-------|--|-----------------|-------------------|
| Stanislaus Urban County | | | | | | | |
| Ceres | 57.7% | 2.6% | 1.3% | 6.8% | 0.8% | 25.2% | 5.5% |
| Hughson | 77.2% | 0.8% | 1.5% | 1.5% | 0.2% | 14.8% | 4.4% |
| Newman | 66.6% | 2.3% | 1.0% | 1.9% | 0.4% | 22.4% | 5.4% |
| Oakdale | 80.1% | 0.8% | 1.0% | 2.2% | 0.2% | 11.5% | 4.1% |
| Patterson | 49.6% | 6.3% | 1.1% | 5.2% | 1.4% | 30.5% | 5.9% |
| Waterford | 71.0% | 0.9% | 1.3% | 1.5% | 0.1% | 20.6% | 4.6% |
| Entitlement City | | | | | | | |
| Turlock | 69.8% | 1.7% | 0.9% | 5.6% | 0.5% | 16.5% | 5.0% |

Source: 2010 U.S. Census

³ Race is shown for persons who reported being of that race alone. Persons reporting more than one race are included in “two or more races.” Persons who indicated they were of only one race but did not report a race in one of the five categories shown are included in “some other race.”

⁴ The racial minority population includes all persons reporting a race other than White.

Table 5
Hispanic Origin as a Percentage of Total Population

| Jurisdiction | Hispanic or Latino (all races) | Not Hispanic or Latino (all races) |
|--------------------------------|---------------------------------------|---|
| Stanislaus Urban County | | |
| Ceres | 56.0% | 44.0% |
| Hughson | 43.2% | 56.8% |
| Newman | 61.6% | 38.4% |
| Oakdale | 26.1% | 73.9% |
| Patterson | 58.6% | 41.4% |
| Waterford | 42.3% | 57.7% |
| Entitlement City | | |
| Turlock | 36.4% | 63.6% |

Source: 2010 U.S. Census

Income

In this AI, income will be discussed using the income categories as defined in **Table 6**. These categories correspond to the income limits published annually by HUD. HUD bases these income categories on the Decennial Census with adjustment factors applied using the annual American Community Survey (ACS). Income categories take family size into consideration. The income limit for a family of four is shown for illustration.

Table 6
Income Categories

| Term | Percentage of AMI¹ | 2015 Income Limit, Family of 4² |
|------------------------------|--------------------------------------|---|
| Stanislaus County | | |
| Extremely low income | 30% | \$24,250 |
| Very low income | 50% | \$28,450 |
| Low income | 80% | \$45,500 |
| Moderate income ³ | 120% | \$68,280 |

1. AMI = area median family income

2. Based on the Modesto, CA, Metropolitan Statistical Area (MSA) 2015 AMI of \$53,500

3. HUD does not publish a "moderate income" limit. It is calculated as 2.4 times the published very low-income limit.

Table 7 provides a summary of income statistics as reported by the 2011 ACS for all jurisdictions within the Stanislaus Urban County except the unincorporated area of the County. The 2011 ACS provides data for a Census-designated place (CDP). A CDP comprises a densely settled concentration of population that is not within an incorporated place but is locally identified by a name. The Stanislaus Urban County has 22 different CDPs. To get a better idea of the incomes for the unincorporated area, **Table 8** provides data on the CDPs in the unincorporated parts of Stanislaus County.

The communities of the Stanislaus Urban County have a significant disparity of household income between them. Median incomes range from \$18,779 in the Airport CDP to \$107,250 in the East Oakdale CDP.

Table 7
Income Characteristics for Incorporated Jurisdictions

| Jurisdiction | Median Household Income | Per Capita Income |
|--------------------------------|--------------------------------|--------------------------|
| Stanislaus Urban County | | |
| Ceres | \$50,124 | \$17,688 |
| Hughson | \$49,997 | \$19,985 |
| Newman | \$47,416 | \$18,134 |
| Oakdale | \$59,842 | \$25,238 |
| Patterson | \$54,187 | \$20,649 |
| Waterford | \$54,413 | \$17,228 |
| Entitlement City | | |
| Turlock | \$50,862 | \$22,289 |

Source: 2007–2011 ACS

Table 8
Income Characteristics for Unincorporated Areas

| Census-Designated Place | Median Household Income | Per Capita Income |
|--------------------------------|--------------------------------|--------------------------|
| Unincorporated Areas | | |
| Airport | \$18,779 | \$9,706 |
| Bret Harte | \$30,833 | \$10,300 |
| Bystrom | \$22,227 | \$10,543 |
| Cowan | \$33,594 | \$11,544 |
| Crows Landing | \$70,357 | \$12,860 |
| Del Rio | \$107,171 | \$77,510 |
| Denair | \$64,136 | \$23,537 |
| Diablo Grande | \$88,393 | \$40,719 |
| East Oakdale | \$107,250 | \$46,810 |
| Empire | \$31,570 | \$12,729 |
| Grayson | \$41,250 | \$12,381 |
| Hickman | \$60,150 | \$19,337 |
| Keyes | \$34,423 | \$12,996 |
| Monterey Park Tract | \$85,256 | \$13,865 |
| Parklawn | \$38,519 | \$12,647 |
| Riverdale Park | \$34,353 | \$14,726 |
| Rouse | \$18,895 | \$9,476 |
| Shackelford | \$23,870 | \$7,829 |
| Valley Home | \$38,250 | \$18,402 |
| Westley | \$38,798 | \$8,714 |
| West Modesto | \$31,110 | \$12,751 |

Source: 2007–2011 ACS

Areas of Low- and Very Low-Income Concentration

Data on income was examined at the block group level to determine areas of low- and very low-income concentration (2015 HUD Low and Moderate Income Summary Data).

Low-income areas are those that have 51 percent or more low-income persons.⁵ Please see **Map 3** in **Appendix 3**. Areas with 50 percent or more low- and moderate-income households include unincorporated portions of the County surrounding Patterson, Empire, and Bystrom and portions of Ceres, Turlock, and Oakdale.

Poverty

In addition to reporting income, the ACS reports the number of persons and families that have incomes that fall below the Federal poverty level.⁶ The poverty level is adjusted for family size and composition, making it a more relative measure than household income. Persons and families that are below the poverty level are in general very poor. Please see **Table 9** for data on persons, families, and children who fall below the poverty line.

Waterford, Newman, and Hughson each have a level of poverty above 20 percent. These jurisdictions also have a notably high level of children in poverty.

Table 9
Share of Population Below Poverty

| Jurisdiction | Persons | Persons Under 18 Years of Age | Families |
|----------------------------------|---------|-------------------------------|----------|
| Stanislaus Urban County | | | |
| Ceres | 19.9% | 25.8% | 15.9% |
| Hughson | 20.6% | 31.7% | 13.6% |
| Newman | 21.5% | 27.6% | 14.5% |
| Oakdale | 15.6% | 19.3% | 12.7% |
| Patterson | 16.0% | 20.9% | 10.9% |
| Waterford | 23.3% | 27.0% | 13.6% |
| Entitlement Jurisdictions | | | |
| Turlock | 17.2% | 21.4% | 10.9% |
| Stanislaus Urban County Total | 20.3% | 28.4% | 16.4% |

Source: 2008–2012 ACS (HCD data packet)

⁵ Using the LOWMODPCT variable, which is defined as “the percentage of persons who are of low/moderate income; calculated by LOWMOD/LOWMODUNIV times 100.”

⁶ The “poverty level” is a measure of poverty used by the U.S. Census Bureau based on a set of money income thresholds that vary by family size and composition. If the total income for a family or unrelated individual falls below the applicable poverty threshold, that family or person is classified as being below the poverty level.

Education

Education level plays a critical role in determining the income level of a household. **Table 10** provides a summary of educational attainment for persons aged 25 years and older for the share of the population in each jurisdiction under the poverty level. For the share of persons having a college degree, only two of the six jurisdictions in the Stanislaus Urban County were below the State percentage (4.8 percent).

Table 10
Educational Attainment for Persons Aged 25 Years and Older Under the Poverty Level

| Jurisdiction | Percentage Less Than High School Graduate | Percentage High School Graduate and Equivalent | Percentage Some College (no degree) | Percentage College Degree |
|--------------------------------|---|--|-------------------------------------|---------------------------|
| Stanislaus Urban County | | | | |
| Ceres | 23.5% | 15.3% | 13.3% | 4.6% |
| Hughson | 28.3% | 14.3% | 5.3% | 10.8% |
| Newman | 33.0% | 13.6% | 12.8% | 9.0% |
| Oakdale | 29.8% | 14.1% | 6.7% | 8.6% |
| Patterson | 23.8% | 13.9% | 4.5% | 8.0% |
| Waterford | 35.4% | 18.7% | 9.6% | 4.2% |
| Entitlement City | | | | |
| Turlock | 21.2% | 15.7% | 12.4% | 5.1% |

Source: 2008–2012 ACS

Employment

This section provides an overview of employment trends in Stanislaus County. The manufacturing industry continues to be an important employer in Stanislaus County. The top 12 employers in the manufacturing industry in 2014 are listed in **Table 11**.

Table 11
Major Manufacturing Employers – Stanislaus County

| Employer | Description | Number of Employees |
|----------------------------------|--------------------------|---------------------|
| Zabaco Winery | Winery | 1,000–4,999 |
| Foster Farms | Poultry Processing Plant | 1,000–4,999 |
| Fairbanks Cellars | Winery | 1,000–4,999 |
| Ecco Domani Winery | Winery | 1,000–4,999 |
| E & J Gallo Winery | Winery | 1,000–4,999 |
| Del Monte Foods | Canning | 1,000–4,999 |
| Con Agra Foods Inc | Canning | 1,000–4,999 |
| Bartles & Jaymes Company | Winery | 1,000–4,999 |
| Andre Champagne Cellars | Winery | 1,000–4,999 |
| Carlo Rossi Winery | Winery | 1,000–4,999 |
| CVS Caremark Distribution Center | Distribution Center | 500–999 |
| Modesto Bee | Newspaper | 500–999 |

Source: California EDD 2014

Some of Stanislaus County's largest employers are also in the non-manufacturing field. The top 13 non-manufacturing employers for 2014 are listed in **Table 12**.

Table 12
Major Non-Manufacturing Employers – Stanislaus County

| Employer | Description | Number of Employees |
|--------------------------------------|--|---------------------|
| Stanislaus County Community Services | Government Office | 1,000–4,999 |
| Memorial Medical Center | Hospital | 1,000–4,999 |
| Doctors Medical Center | Hospital | 1,000–4,999 |
| Emanuel Medical Center | Hospital | 1,000–4,999 |
| Hornsby's Pub Draft Cider Ltd. | Beverages | 1,000–4,999 |
| Oak Valley Hospital | Hospital | 500–999 |
| Frito-Lay Inc. | Potato Chips/Snack Foods | 500–999 |
| California State University | Schools – Universities & Colleges Academic | 500–999 |
| Alliance Worknet | County Government – Social/Human Resources | 500–999 |
| Stanislaus County Community | Government Offices | 500–999 |
| Stanislaus County Welfare Dept | County Government | 500–999 |
| Women Infants Child Program – WIC | Social Service & Welfare Organization | 500–999 |
| Turlock Irrigation District | Electric Company | 250–499 |

Source: California EDD 2014

Table 13 shows the number of persons employed in Stanislaus County by industry type in 2012. The top three industries are educational, health and social services; manufacturing; and retail trade.

Table 13
Employment by Industry – Stanislaus County

| Industry Type | Number | Percentage |
|--|---------|---------------------|
| Agriculture, forestry, fishing, hunting, and mining | 11,004 | 5.4% |
| Construction | 15,185 | 7.4% |
| Manufacturing | 26,026 | 12.8% |
| Wholesale trade | 8,532 | 4.2% |
| Retail Trade | 26,074 | 12.8% |
| Transportation, warehousing, and utilities | 10,768 | 5.3% |
| Information | 2,741 | 1.3% |
| Finance, insurance, real estate, rental and leasing | 7,939 | 3.9% |
| Professional, scientific, management, administration | 16,803 | 8.2% |
| Educational, health and social services | 44,568 | 21.8% |
| Arts, entertainment, recreation, and services | 16,107 | 7.9% |
| Other services | 10,428 | 5.1% |
| Public administration | 10,428 | 3.9% |
| TOTAL | 204,032 | 100.0% ¹ |

Source: 2008–2012 ACS (HCD data packet)

Notes: 1. Percentages may not equal 100 due to rounding.

Table 14 indicates the average annual wages earned in the private sector by industry type in 2012. The highest overall wages were in education and health services, followed by the manufacturing industry.

Table 14
Wages and Employment – Stanislaus County

| Industry Type | Employment | Percentage of Total | Annual Wages per Employee |
|---|------------|---------------------|---------------------------|
| Total private | 139,111 | 100.0% ¹ | \$39,174 |
| Goods-producing | 40,187 | 28.9% | \$43,971 |
| Natural resources and mining ² | 13,371 | 9.6% | \$27,871 |
| Construction | 6,205 | 4.5% | \$46,156 |
| Manufacturing | 20,610 | 14.8% | \$53,759 |
| Service-providing | 98,924 | 71.1% | \$37,000 |
| Trade, transportation, and utilities | 33,237 | 23.9% | \$35,000 |
| Information | 971 | 0.7% | \$48,000 |
| Financial activities | 5,426 | 3.9% | \$46,000 |
| Professional and business services | 12,878 | 9.3% | \$37,000 |
| Education and health services | 23,631 | 17.0% | \$56,000 |
| Leisure and hospitality | 14,891 | 10.7% | \$14,000 |
| Other services | 7,531 | 5.4% | \$19,000 |
| Unclassified | 360 | 0.3% | \$34,000 |

Source: 2012 Bureau of Labor Statistics Quarterly Census of Employment and Wages

Notes: 1) Percentages may not equal 100 due to rounding.

2) Includes agriculture, forestry, fishing, and hunting workers.

Households

The type, size, and composition of a household can affect the type of housing and services that are needed. The following section provides an analysis of the household profiles for all jurisdictions in the Stanislaus Urban County and the City of Turlock.

Table 15 presents household size, percentage of persons living alone, and percentage of households with persons age 65 and older. Patterson had the largest average household size (3.63 persons) of all the jurisdictions, with the second largest household size (3.55 persons) reported in Ceres. Based on the 2010 U.S. Census, Oakdale had the largest share of persons living alone (21.6 percent) and Hughson reported the largest percentage of households with persons over the age of 65 (26.0 percent).

Table 15
Household Composition, 2010

| Jurisdiction | Average Household Size (persons) | Percentage of Single Persons Living Alone | Percentage of Households with Person 65 and Older |
|--|---|--|--|
| Stanislaus Urban County | | | |
| Ceres | 3.55 | 12.5% | 20.8% |
| Hughson | 3.20 | 17.7% | 26.0% |
| Newman | 3.38 | 15.5% | 20.3% |
| Oakdale | 2.81 | 21.6% | 25.4% |
| Patterson | 3.63 | 12.7% | 17.6% |
| Waterford | 3.43 | 12.4% | 18.5% |
| Unincorporated Area of Stanislaus County | N/A | 15.9% | 29.7% |
| Entitlement City | | | |
| Turlock | 2.96 | 20.9% | 25.0% |

Source: 2010 U.S. Census

Table 16 presents the number of family households and the share of family households that are married, are single parents, and have children under 18 years of age for all jurisdictions in the Stanislaus Urban County and the City of Turlock.

Patterson (49.2 percent) had the largest share of families with children under 18, Waterford (61.0 percent) had the largest share of married couples, and Ceres (14.6 percent) had the largest share of single parents.

Table 16
Family Household Composition

| Jurisdiction | Number of Family Households | Percentage of Total Households Married | Percentage of Total Households with Children Under 18 | Percentage of Total Households with Single Parents |
|--|------------------------------------|---|--|---|
| Stanislaus Urban County | | | | |
| Ceres | 10,575 | 57.6% | 46.8% | 14.6% |
| Hughson | 1,628 | 60.8% | 42.8% | 10.0% |
| Newman | 2,432 | 60.5% | 46.3% | 12.5% |
| Oakdale | 5,298 | 52.9% | 36.6% | 11.2% |
| Patterson | 4,647 | 60.4% | 49.2% | 12.7% |
| Waterford | 2,047 | 61.0% | 46.5% | 12.5% |
| Unincorporated Area of Stanislaus County | 26,461 | 58.2% | 37.8% | 13.0% |
| Entitlement Jurisdictions | | | | |
| Turlock | 16,669 | 52.9% | 36.7% | 10.9% |
| Stanislaus Urban County Total | 53,088 | 58.0% | 41.2% | 14.5% |

Source: 2010 U.S. Census

Special Needs Populations – Non-Homeless

Certain groups may have more difficulty finding housing and may require specialized services or assistance. Owing to their special circumstances, they are more likely to have extremely low, very low, low, or moderate incomes. These groups include the elderly, the frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, victims of domestic violence, large households, and single parent-headed households.

Elderly

The three jurisdictions with the largest share of senior households were Hughson (26.1 percent), Oakdale (21.4 percent), and City of Turlock (20.5 percent). Please see **Table 17**.

Of all member jurisdictions in the Stanislaus Urban County, only Hughson (46.7 percent) had less than 50 percent of senior households reporting that they owned their homes.

Table 17
Senior Households

| Jurisdiction | Percentage of Senior Households | Percentage of Owner Households | Percentage of Renter Households |
|--|---------------------------------|--------------------------------|---------------------------------|
| Stanislaus Urban County | | | |
| Ceres | 16.4% | 79.7% | 20.3% |
| Hughson | 26.1% | 46.7% | 53.3% |
| Newman | 13.4% | 61.3% | 38.7% |
| Oakdale | 21.4% | 70.3% | 29.7% |
| Patterson | 13.3% | 93.1% | 6.9% |
| Waterford | 15.7% | 62.8% | 37.2% |
| Unincorporated Area of Stanislaus County | 19.2% | 84.0% | 16.0% |
| Entitlement Jurisdictions | | | |
| Turlock | 20.5% | 64.9% | 35.1% |
| Stanislaus Urban County Total | 18.8% | 80.6% | 19.4% |

Source: 2008–2012 ACS (HCD data packet)

Persons with Disabilities

Table 18 presents data from the 2000 Census (data is not available in the 2010 Census) for persons with disabilities in all jurisdictions in the Stanislaus Urban County and the City of Turlock. Of the jurisdictions in the Stanislaus Urban County, Hughson (11.3 percent) had the greatest share of persons with a disability for all persons over 5 years of age, followed by Oakdale (11.1 percent). Patterson (5.8 percent) had the smallest share of persons with a disability, followed by Waterford (7.8 percent). Data for Ceres was unavailable from the 2000 U.S. Census.

Table 18
Disability Status and Types

| Jurisdiction | Number of Disabled Persons | Percentage of Persons Disabled | Percentage of Disabled Population –Sensory | Percentage of Disabled Population –Physical | Percentage of Disabled Population –Mental | Percentage of Disabled Population –Self-Care | Percentage of Disabled Population –Go-Outside-Home | Percentage of Disabled Population – Employment Disability |
|--|-----------------------------------|---------------------------------------|---|--|--|---|---|--|
| Stanislaus Urban County | | | | | | | | |
| Ceres | N/A | N/A | 8.2% | 23.1% | 14.8% | 6.0% | 21.1% | 26.9% |
| Hughson | 432 | 11.3% | 12.4% | 28.6% | 16.4% | 9.0% | 14.5% | 19.2% |
| Newman | 515 | 8.1% | 11.9% | 21.8% | 16.3% | 9.8% | 20.2% | 20.0% |
| Oakdale | 1,586 | 11.1% | 9.3% | 24.6% | 15.1% | 8.7% | 18.3% | 24.0% |
| Patterson | 613 | 5.8% | 13.6% | 20.7% | 10.3% | 5.8% | 22.8% | 26.8% |
| Waterford | 491 | 7.8% | 9.6% | 20.8% | 14.6% | 7.9% | 16.0% | 31.1% |
| Unincorporated Area of Stanislaus County | 12,461 | 9.7% | 9.5% | 23.9% | 13.8% | 6.7% | 20.8% | 25.2% |
| Entitlement City | | | | | | | | |
| Turlock | 4,484 | 8.8% | 10.0% | 23.2% | 16.0% | 7.4% | 21.7% | 21.6% |

Source: 2000 U.S. Census (HCD data packet)

Large Households

Large family households are defined as households of five or more persons who are related. Large family households are considered a special needs group because there is a limited supply of adequately sized housing to accommodate their needs.

Table 19 provides data for large households for all jurisdictions in the Stanislaus Urban County and the City of Turlock. The jurisdictions with the greatest share of large households were Waterford (27.2 percent), Ceres (23.1 percent), and Patterson (21.8 percent). Oakdale had the smallest share of large households (13.3 percent).

Based on data from the 2007–2011 ACS, the supply of housing units with three or more bedrooms available for ownership and rental is in excess of the number of large owner and rental households. This suggests that there is not a numerical shortage of available housing units to meet the needs of large households. However, lower-income large households may be priced out of the larger housing units.

Table 19
Large Households

| Jurisdiction | Large Households | Percentage of Large Households | Percentage of Total Owner-Occupied Households | Percentage of Total Renter-Occupied Households |
|--|------------------|--------------------------------|---|--|
| Stanislaus Urban County | | | | |
| Ceres | 3,080 | 23.1% | 29.9% | 23.4% |
| Hughson | 359 | 19.1% | 12.6% | 16.4% |
| Newman | 696 | 21.2% | 23.4% | 22.1% |
| Oakdale | 995 | 13.3% | 15.1% | 14.0% |
| Patterson | 1,470 | 21.8% | 36.3% | 26.5% |
| Waterford | 637 | 27.2% | 27.4% | 27.2% |
| Unincorporated Area of Stanislaus County | 6,888 | 17.1% | 25.0% | 20.0% |
| Entitlement Jurisdictions | | | | |
| Turlock | 3,217 | 14.2% | 13.6% | 13.9% |
| Stanislaus Urban County Total | 14,125 | 22.4% | 18.9% | 29.8% |

Source: 2008–2012 ACS (HCD data packet)

Female-Headed Households

Families with female heads of households experience a high incidence of all jurisdictions in the Stanislaus Urban County and the City of Turlock. As shown in **Table 20**, the share of female-headed households in poverty ranges from 2.7 percent in unincorporated areas to 8.8 percent in Hughson.

Table 20
Female-Headed Households

| Jurisdiction | Total Female-Headed Households | Percentage of Female-Headed Households with Children | Percentage of Female-Headed Households without Children | Percentage of Female-Headed Households in Poverty | Percentage of Total Families in Poverty |
|--|---------------------------------------|---|--|--|--|
| Stanislaus Urban County | | | | | |
| Ceres | 2,389 | 14.5% | 8.2% | 7.2% | 15.9% |
| Hughson | 406 | 17.0% | 9.0% | 8.8% | 13.6% |
| Newman | 450 | 15.1% | 3.0% | 5.6% | 14.5% |
| Oakdale | 790 | 10.3% | 4.6% | 6.5% | 12.7% |
| Patterson | 551 | 8.4% | 4.2% | 5.2% | 10.9% |
| Waterford | 388 | 13.6% | 6.8% | 4.7% | 13.6% |
| Unincorporated Area of Stanislaus County | 4,418 | 12.6% | 4.0% | 2.7% | 9.0% |
| Entitlement Jurisdictions | | | | | |
| Turlock | 3,241 | 13.0% | 6.8% | 4.2% | 10.9% |
| Stanislaus Urban County Total | 9,392 | 12.1% | 5.7% | 6.4% | 15.2% |

Source: 2008–2010 ACS (HCD data packet)

Note: Percentages are based on total number of households.

Housing Characteristics

The most significant trend in the Stanislaus Urban County and the City of Turlock housing markets has been the decrease in single-family home sales prices and the corresponding decrease in the value of single-family housing. Combined with an environment of historically low interest rates, this has reduced the gap between the cost of buying a home and the price which households at the lower end of the range of incomes can afford. Although this “affordability gap” has been reduced when it comes to home purchase, the combination of instability in the job market, stagnating real wages, and the general tightening of credit has not necessarily made home purchase easier for lower-income households.

The rental market has seen continued low vacancy rates, and rents have been stable and trending upward.

The following discussion identifies housing characteristics, trends, and needs for Stanislaus County jurisdictions.

Housing Growth

Between 2000 and 2014, the number of housing units increased throughout Stanislaus Urban County member jurisdictions but declined in the unincorporated area of Stanislaus County by 5.1 percent. **Table 21** displays housing growth in all jurisdictions in the Stanislaus Urban County. Of all the jurisdictions in the Stanislaus Urban County, Hughson had the largest increase in housing units (5.2 percent). Second to that was Newman with an increase of 2.4 percent. The City of Turlock had an increase of 0.4 percent.

Table 21
Housing Units, 2000–2014

| Jurisdiction | 2000 Housing Units | 2014 Housing Units | Percentage Change 2000–2014 |
|--|-----------------------------------|-----------------------------------|--|
| Stanislaus Urban County | | | |
| Ceres | 13,673 | 13,725 | 0.4% |
| Hughson | 2,234 | 2,350 | 5.2% |
| Newman | 3,357 | 3,437 | 2.4% |
| Oakdale | 7,822 | 7,961 | 1.8% |
| Patterson | 6,328 | 6,363 | 0.6% |
| Waterford | 2,665 | 2,665 | 0.0% |
| Unincorporated Area of Stanislaus County | 37,346 | 35,455 | -5.1% |
| Entitlement Jurisdictions | | | |
| Turlock | 24,627 | 24,727 | 0.4% |
| Stanislaus Urban County Total | 73,425 | 71,956 | -2.0% |

Source: 2000 and 2014 DOF (HCD data packet)

Tenure

Housing tenure refers to whether a unit is owner-occupied or renter-occupied. **Table 22** provides a summary of housing tenure for all jurisdictions in the Stanislaus Urban County and the City of Turlock. As shown, Patterson had the greatest share of owner-occupied households (67.5 percent) and the City of Turlock had the greatest share of renter-occupied housing units (44.6 percent).

Table 22
Housing Tenure

| Jurisdiction | Owner-Occupied | Renter-Occupied |
|--|-----------------------|------------------------|
| Stanislaus Urban County | | |
| Ceres | 63.1% | 36.9% |
| Hughson | 67.1% | 32.9% |
| Newman | 66.6% | 33.4% |
| Oakdale | 61.1% | 36.9% |
| Patterson | 67.5% | 32.5% |
| Waterford | 66.2% | 33.8% |
| Unincorporated Area of Stanislaus County | 63.4% | 36.6% |
| Entitlement Jurisdictions | | |
| Turlock | 55.4% | 44.6% |
| Stanislaus Urban County Total | 63.8% | 36.2% |

Source: 2010 U.S. Census (HCD data packet)

Housing Type

Table 23 exhibits the percentage of housing units as a share of total housing units by the number of units in the structure for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Demand for owner-occupied housing is primarily met through the supply of single-family housing, while renter-occupied housing demand is primarily met through a combination of single-family housing and multi-family units.

Table 23
Units in Structure

| Jurisdiction | Single-Family | Multi-Family (2–4 units) | Multi-Family (>5 units) | Mobile Homes, Boat, RV, Van, etc. |
|----------------------------------|---------------|--------------------------|-------------------------|-----------------------------------|
| Stanislaus Urban County | | | | |
| Ceres | 80.93% | 1.88% | 10.34% | 2.75% |
| Hughson | 84.93% | 1.88% | 10.52% | 2.75% |
| Newman | 87.46% | 4.85% | 7.69% | 0.00% |
| Oakdale | 82.44% | 5.70% | 7.78% | 4.09% |
| Patterson | 91.18% | 2.47% | 4.26% | 2.10% |
| Waterford | 81.80% | 4.16% | 13.62% | 0.42% |
| Entitlement Jurisdictions | | | | |
| Turlock | 73.27% | 7.08% | 15.85% | 2.79% |
| Stanislaus Urban County Total | 81% | 5% | 8% | 6% |

Source: 2007–2011 ACS

Vacancy Rate

Vacancy trends in housing are analyzed using a “vacancy rate,” which establishes the relationship between housing supply and demand. For example, if the demand for housing is greater than the available supply, the vacancy rate is low and the price of housing will most likely increase. Additionally, the vacancy rate indicates whether or not the community has an adequate housing supply to provide choice and mobility. HUD standards indicate that a vacancy rate of 5 percent is sufficient to provide choice and mobility.

Table 24 provides the total number of vacant housing units as well as the percentage of vacant housing units in 2010 for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Please note that the California Department of Finance (DOF) estimate is for all housing unit types and does not exclude seasonal, recreational, or occasional use and all other vacant units. The DOF also does not provide vacancy by tenure. To provide vacancy by other reason for vacancy, 2000 Census data was used (see **Table 24**).

Overall, the 2010 data (**Table 24**) indicates that Stanislaus Urban County has vacancy rates ranging from 6.8 percent to 11.0 percent. Patterson had the highest vacancy rate (11.0 percent) and Oakdale had the lowest (6.8 percent). Overall Stanislaus Urban County had a vacancy rate of 8.3 percent in 2010.

Table 24
Vacancy Status, 2010

| Jurisdiction | Total Vacant Housing Units | Percentage of Total Housing Units Vacant |
|--|-----------------------------------|---|
| Stanislaus Urban County | | |
| Ceres | 981 | 7.2% |
| Hughson | 165 | 7.4% |
| Newman | 355 | 10.5% |
| Oakdale | 534 | 6.8% |
| Patterson | 698 | 11.0% |
| Waterford | 207 | 7.8% |
| Unincorporated Area of Stanislaus County | 3,105 | 9.3% |
| Entitlement Jurisdictions | | |
| Turlock | 1,855 | 7.5% |
| Stanislaus Urban County Total | 4,537 | 8.3% |

Source: 2010 DOF Census (HCD data packet)

Age of Housing Stock

Table 25 displays the share of housing units constructed by age and tenure in all jurisdictions in the Stanislaus Urban County and the City of Turlock. With the exception of Stanislaus Urban County, City of Turlock, and Ceres, most housing in each jurisdiction was built after 1980.

Table 25
Age of Housing by Tenure

| Jurisdiction | Before 1950 | | | 1950 to 1979 | | | 1980 to 1999 | | | 2000 or Later | | |
|-------------------------------|-------------|--------|-------|--------------|--------|-------|--------------|--------|-------|---------------|--------|-------|
| | Total | Renter | Owner | Total | Renter | Owner | Total | Renter | Owner | Total | Renter | Owner |
| Stanislaus Urban County | | | | | | | | | | | | |
| Ceres | 5% | 8% | 4% | 35% | 42% | 32% | 38% | 36% | 39% | 21% | 14% | 24% |
| Hughson | 18% | 27% | 13% | 15% | 20% | 13% | 23% | 18% | 26% | 43% | 35% | 49% |
| Newman | 18% | 23% | 16% | 19% | 19% | 19% | 30% | 29% | 30% | 33% | 29% | 35% |
| Oakdale | 10% | 6% | 12% | 33% | 24% | 25% | 37% | 41% | 35% | 20% | 7% | 27% |
| Patterson | 9% | 10% | 9% | 15% | 28% | 9% | 33% | 31% | 35% | 42% | 30% | 48% |
| Waterford | 15% | 15% | 14% | 22% | 24% | 21% | 38% | 32% | 40% | 25% | 29% | 23% |
| Entitlement Jurisdictions | | | | | | | | | | | | |
| Turlock | 9% | 10% | 8% | 33% | 37% | 29% | 36% | 38% | 34% | 23% | 16% | 28% |
| Stanislaus Urban County Total | 14% | 14% | 13% | 34% | 40% | 30% | 32% | 31% | 33% | 20% | 15% | 23% |

Source: 2007–2011 ACS

Housing Cost

Table 26 provides a summary of home sales prices for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Stanislaus County experienced a sharp increase in the median sales price for homes from 2012 to 2013. It is important to note that as a measure of central tendency, median sales price is sensitive to sales volume in market subsectors as much as it is to overall price trends. An increase in the volume of sales of higher-priced homes relative to overall sales volume can lead to an increase in median sales price even though overall prices remain low.

As shown, as of 2013, Waterford had the lowest median sales price (\$143,500) and Hughson the highest (\$250,000). Patterson and Hughson experienced the sharpest increases in the median sales price of homes from 2012 to 2013.

In 2015, a survey of local newspapers and online rental listings was conducted for both single-family homes and multi-family units for all jurisdictions in Stanislaus County. The results are presented in **Table 27**. According to the results of the survey, the median rental rate in Stanislaus Urban County is \$1,095 and in the City of Turlock is \$845.

HUD publishes annual Fair Market Rents, which include an estimated utility cost, and the annual income required to afford them. **Table 28** shows the Fair Market Rents for 2014 for the Stanislaus Urban County.

Table 26
Median Home Sale Prices

| Jurisdiction | 2011 | Year-to-Year Change 2012 | | Year-to-Year Change 2013 | |
|---------------------------|-----------|-----------------------------|------------|-----------------------------|------------|
| | | Dollars | Percentage | Dollars | Percentage |
| Stanislaus Urban County | | | | | |
| Ceres | \$127,500 | \$130,250 | 2.16% | \$160,000 | 22.84% |
| Hughson | \$170,000 | \$185,000 | 8.82% | \$250,000 | 35.14% |
| Newman | \$110,000 | \$116,750 | 6.14% | \$145,000 | 24.20% |
| Oakdale | \$168,000 | \$175,000 | 4.17% | \$210,000 | 20.00% |
| Patterson | \$142,000 | \$150,000 | 5.63% | \$210,000 | 40.00% |
| Waterford | \$110,000 | \$113,000 | 2.73% | \$143,500 | 26.99% |
| Entitlement Jurisdictions | | | | | |
| Turlock | \$153,000 | \$160,000 | 5.58% | \$195,000 | 22.19% |

Source: 2011–2013 DataQuick

Table 27
Median Rental Listings

| Place/Community | Type: Bedroom (BR) | | | | | Median Rent |
|---------------------------|--------------------|-------|-------|---------|---------|-------------|
| | Studio | 1 BR | 2 BR | 3 BR | 4 BR | |
| Stanislaus Urban County | | | | | | |
| Stanislaus Urban County | N/A | \$653 | \$823 | \$1,148 | \$1,400 | \$1,095 |
| Entitlement Jurisdictions | | | | | | |
| Turlock | N/A | \$690 | \$885 | \$950 | \$1,795 | \$845 |

Source: PMC rental survey, 2015

Table 28
Fair Market Rents, 2014

| Unit Size | FMR |
|-----------|---------|
| Studio | \$583 |
| 1-bedroom | \$720 |
| 2-bedroom | \$923 |
| 3-bedroom | \$1,360 |
| 4-bedroom | \$1,578 |

Source: U.S. Department of Housing and Urban Development, 2015 Fair Market Rent, Modesto, CA, MSA

Housing Affordability by Tenure and Household Type

The assessment of the Stanislaus Urban County's and the City of Turlock's housing needs relies on custom tabulations of U.S. Decennial Census data provided by HUD. These tabulations are referred to as the CHAS (Comprehensive Housing Affordability Strategy) tables obtained using HUD's State of the Cities Data System. This data is presented in two main tables, one presenting housing problems by households and the other presenting affordability mismatch by housing units. **Tables 29** and **30** provide a summary of cost burden. The needs of renter and owner households are examined separately.

The CHAS housing problems table presents the number of households paying more than 30 percent and 50 percent of gross income for housing by tenure, household type, and income category. This cost of housing as a percentage of gross income is referred to as the housing cost burden. According to HUD, a household which has a housing cost burden over 30 percent has a high housing cost burden. Those with a cost burden over 50 percent have a severe cost burden.

Overpayment is a concern for low-income households since they may be forced to live in overcrowded situations or cut other necessary expenditures, such as health care, in order to afford housing. The HUD definition of housing cost includes not only monthly rent and mortgage payments but an estimate of utilities.

Renter Households

Overall, renter households in Stanislaus County have a higher cost burden than owner households. Low-income renter households (>50 to ≤80 percent area median income [AMI]) experience a high cost burden at close to the same rate as do all renter households. Very low-income (>30 percent to ≤50 percent AMI) and extremely low-income renter households (≤30 percent AMI) experience cost burdens much higher than all renters.

Owner Households

Owner households in Stanislaus County have a lower percentage of cost burden than renter households. Ceres and Patterson have a severe cost burden of over 10 percent, while the remaining jurisdictions all have lower rates of severe cost burden among owner households.

Generally, lower-income owner households experience a high cost burden at a higher rate than do all owner households. Extremely low-income owner households (≤30 percent AMI) experience the highest levels of cost burden among all owner households.

Table 29
Cost Burden Summary, Renters

| Jurisdiction | All Renters | | Elderly | | Large | | Low-Income | | Very Low-Income | | Extremely Low-Income | |
|--------------------------------|-------------|--------|---------|--------|-------|--------|------------|--------|-----------------|--------|----------------------|--------|
| | High | Severe | High | Severe | High | Severe | High | Severe | High | Severe | High | Severe |
| Stanislaus Urban County | | | | | | | | | | | | |
| Ceres | 50.7% | 33.2% | 5.7% | 3.1% | 9.9% | 7.3% | 55.7% | 14.1% | 92.4% | 58.1% | 81.2% | 73.5% |
| Hughson | 48.2% | 29.2% | 26.3% | 15.3% | 9.5% | 2.2% | 100.0% | 46.4% | 68.4% | 39.5% | 100.0% | 100.0% |
| Newman | 55.0% | 33.6% | 4.3% | 4.3% | 16.6% | 6.2% | 85.5% | 34.8% | 66.7% | 42.9% | 76.3% | 76.3% |
| Oakdale | 34.3% | 24.0% | 11.8% | 5.2% | 1.7% | 1.1% | 54.4% | 5.4% | 91.5% | 64.4% | 75.7% | 73.0% |
| Patterson | 34.4% | 23.2% | 3.6% | 2.5% | 7.3% | 3.9% | 46.8% | 24.1% | 91.7% | 55.0% | 90.6% | 90.6% |
| Waterford | 49.3% | 27.1% | 13.9% | 4.4% | 12.4% | 5.0% | 52.3% | 6.2% | 95.2% | 9.5% | 71.7% | 71.7% |
| Entitlement City | | | | | | | | | | | | |
| Turlock | 48.9% | 28.1% | 12.7% | 6.4% | 5.7% | 1.7% | 75.9% | 17.7% | 87.4% | 55.8% | 85.6% | 77.7% |

Source: 2011 CHAS data

Table 30
Cost Burden Summary, Owners

| Jurisdiction | All Owners | | Elderly | | Large | | Low-Income | | Very Low-Income | | Extremely Low-Income | |
|--------------------------------|------------|--------|---------|--------|-------|--------|------------|--------|-----------------|--------|----------------------|--------|
| | High | Severe | High | Severe | High | Severe | High | Severe | High | Severe | High | Severe |
| Stanislaus Urban County | | | | | | | | | | | | |
| Ceres | 16.6% | 11.0% | 6.5% | 2.5% | 14.0% | 5.5% | 60.8% | 31.5% | 66.2% | 52.8% | 73.4% | 60.9% |
| Hughson | 13.1% | 7.5% | 3.7% | 1.9% | 9.7% | 1.5% | 66.7% | 26.7% | 80.0% | 80.0% | 25.0% | 0.0% |
| Newman | 12.1% | 9.6% | 5.1% | 3.3% | 8.6% | 2.8% | 43.7% | 40.7% | 74.3% | 57.1% | 76.9% | 53.8% |
| Oakdale | 12.9% | 9.4% | 9.3% | 5.4% | 4.9% | 2.2% | 56.7% | 34.6% | 64.7% | 49.0% | 72.4% | 72.4% |
| Patterson | 14.2% | 10.8% | 5.4% | 4.5% | 11.0% | 2.0% | 64.3% | 40.0% | 73.2% | 53.7% | 93.8% | 93.8% |
| Waterford | 16.0% | 7.6% | 7.5% | 4.5% | 12.6% | 1.8% | 65.2% | 21.7% | 100.0% | 62.5% | 77.8% | 55.6% |
| Entitlement City | | | | | | | | | | | | |
| Turlock | 13.3% | 8.4% | 8.0% | 3.6% | 6.1% | 1.7% | 57.7% | 32.5% | 72.0% | 49.9% | 72.5% | 46.4% |

Source: 2011 CHAS data

Overcrowding

Table 31 illustrates the share of households by person per room for owners and renters for all jurisdictions in the Stanislaus Urban County and the City of Turlock. Households with more than 1 person per room are considered overcrowded. Households with more than 1.5 persons per room are considered severely overcrowded. As shown in **Table 31**, renter-occupied households have a higher incidence of overcrowding than owner-occupied households.

Table 31
Persons per Room

| Jurisdiction | Owner Occupied | | | Renter Occupied | | |
|--|----------------|---------------------|--------------|-----------------|---------------------|--------------|
| | <1.0 persons | 1.01 to 1.5 persons | >1.5 persons | <1.0 persons | 1.01 to 1.5 persons | >1.5 persons |
| Stanislaus Urban County | | | | | | |
| Ceres | 60.2% | 2.8% | 0.2% | 31.4% | 4.2% | 1.3% |
| Hughson | 55.7% | 2.6% | 0.0% | 37.9% | 2.8% | 1.0% |
| Newman | 58.5% | 2.2% | 0.0% | 34.8% | 4.1% | 0.4% |
| Oakdale | 58.1% | 0.1% | 0.8% | 37.1% | 2.7% | 1.3% |
| Patterson | 65.2% | 1.9% | 0.2% | 26.4% | 3.6% | 2.6% |
| Waterford | 65.2% | 2.7% | 1.4% | 26.4% | 2.3% | 2.0% |
| Unincorporated Area of Stanislaus County | 59.8% | 2.7% | 0.7% | 31.3% | 4.2% | 1.1% |
| Entitlement Jurisdictions | | | | | | |
| Turlock | 53.3% | 1.1% | 0.3% | 41.1% | 2.8% | 1.3% |
| Stanislaus Urban County Total | 60.2% | 2.4% | 0.5% | 31.7% | 3.9% | 1.3% |

Source: 2008–2012 ACS (HCD data packet)

Foreclosures

A foreclosure is a term used to describe the procedure followed in enforcing a creditor's rights when a debt secured by any lien on property is in default.

According to Realty Trac in February 2015, the number of properties that received a foreclosure filing in Stanislaus County (countywide) was 20 percent lower than the previous month and 33 percent lower than the same time last year.

Home sales countywide for January 2015 were down 19 percent compared with the previous month, and down 19 percent compared with a year ago. The median sales price of a non-distressed home was \$225,000. The median sales price of a foreclosure home was \$198,000, or 12 percent lower than non-distressed home sales.

- ◆ **Table 32** provides the number of homes in some stage of foreclosure (default, auction or bank owned) in January 2015.

Table 32
Foreclosure Activity January 2015

| Top Cities/Areas | Total Sales (January 2015) | Median Sales Price | Number of Foreclosures (January 2015) |
|-------------------------|-----------------------------------|---------------------------|--|
| Turlock | 57 | \$245,000 | 129 |
| Oakdale | 31 | \$300,000 | 63 |
| Ceres | 29 | \$197,000 | 101 |
| Patterson | 23 | \$269,500 | 85 |
| Newman | 12 | \$207,000 | 20 |
| Salida | 10 | \$220,000 | 44 |
| Hughson | 6 | \$249,500 | 116 |
| Waterford | 6 | \$198,000 | 27 |

Sources: Realty Trac Stanislaus County area data, February 2015.

Private Sector Practices

Private housing industry practices are central to making housing available for all people, from initial inquiries to approval. No single factor is more primary to providing equal and fair access to individuals, regardless of their race/ethnicity, color, national origin, gender, disability, family size, marital status, source of income, age, and sexual orientation, than availability of housing. That is, a real estate agent, broker, property manager, or private individual seller or renter has influence on accessibility when they tell a potential renter or buyer whether a house or apartment is vacant and available to them. Moreover, a financial institution's approval and terms for a new home loan is equally important for individuals to access housing absent discrimination. Secondary to this is the information that individuals receive regarding suitability such as cost, number of bedrooms, accessibility features, and more. Renters and buyers cannot uncover those important characteristics without the assistance of these professionals. In the final stage, accepting the offer of a potential renter or buyer is ultimately in the hands of housing professionals and financial institutions. Therefore, an individual and their family's search for housing, from beginning to end, relies heavily on the private housing industry.

The Fair Housing Act has two primary goals: to end housing discrimination and to promote more equitable and integrated communities. This second goal embodies the American values of fair access and equal opportunity for all. According to the San Joaquin Valley Fair Housing and Equity Assessment (2014), poverty and race have historically been connected due in part to economic factors, historical land use laws and practices, and ongoing housing discrimination. Hispanics and African Americans across the Central Valley region are more likely to live in neighborhoods with high concentrations of poverty compared to Whites. Individuals and families who live in these areas have less access to better jobs, schools, health care, transportation, and housing.⁷ This impacts the ability of individuals to improve themselves and for communities to become more vibrant and healthy places to live for all.

As the gatekeeper to housing opportunities, the housing industry will be analyzed for its contribution to further fair housing. This section of the AI reviews the policies and practices of real estate agents, property managers, small private individual sellers/renters, homeowners, insurance companies, and mortgage lenders in their efforts to offer fair housing choices in the Stanislaus Urban County and the City of Turlock.

Real Estate Sales Practices

Discriminatory practices in real estate (homeownership) are more difficult to detect than in rentals. When people want to buy a home, they often consult with a real estate agent or broker to assist in finding the right housing for their needs, or they could encounter an agent or broker representing the seller. A potential buyer is often unaware whether they are being steered into a different home because of discrimination. As a result, the individual will not report the incident to the professional associations or appropriate government authority. In turn, the professional association will not discipline the agent/broker to prevent further discrimination, nor will the buyer's transaction be remedied. Outreach and education to the association's professional members is key in preventing discriminatory practices. Additionally, outreach to individual buyers to educate them on their rights will be important, as well as investigating/testing real estate practices by Federal, State, and local agencies and nonprofit fair housing advocates, which is discussed further in the Outreach and Education sections below.

⁷ San Joaquin Valley Fair Housing and Equity Assessment (April 2014)

Real Estate Profession – Self-Regulated

In California, in order to engage in the business of real estate sales, a broker or salesperson must be licensed by the California Bureau of Real Estate (CalBRE). CalBRE also enforces violations of California real estate law. In Stanislaus County and the City of Turlock, any case of discrimination or other fair housing violation that is experienced by an individual from a real estate professional could be reported to the local representative association and/or to CalBRE.

The real estate industry in California is highly professionalized. Almost all real estate brokers and salespersons are affiliated with a real estate trade association. The two largest are the California Association of Realtors (CAR), associated with the National Association of Realtors (NAR), and the California Association of Real Estate Brokers (CAREB), associated with the National Association of Real Estate Brokers (NAREB). The use of the term “Realtor” is restricted by NAR as a registered trademark. Members of NAREB are licensed to use the professional designation “Realtist.”



Real Estate Law Violations

The California Bureau of Real Estate regulates and enforces the conduct of its licensed professionals to protect residents from discriminatory practices. Specifically, Title 10, Chapter 6 of the California Code of Regulations prohibits real estate licensed professionals from discriminatory conduct based on race, color, sex, religion, national origin, marital status, physical handicap, and ancestry. Missing or updated categories from California and Federal anti-discrimination laws include familial status, disability, source of income, sexual orientation, and other arbitrary factors; regardless, these are obligatory. CalBRE provides a long, non-exhaustive list of examples of illegal discriminatory conduct, which may be useful to licensed professionals while in the field. Examples include the following.

A real estate professional shall not:

- ◆ refuse to negotiate or making unavailable the sale, rental or financing of real property...
- ◆ refuse or failing to show, rent, sell or finance the purchase of real estate...
- ◆ discriminate in the terms, conditions or privileges of sale, rental or financing of the purpose of real property...
- ◆ discriminate when providing services or facilities connected with the sale, rental or financing of the purchase of real property...
- ◆ discriminate when processing an application more slowly.....
- ◆ based on race, color, sex, religion, national origin, marital status, physical handicap and ancestry.

Brokers and salesperson must pass an exam to become licensed. They are tested on ethics, including discriminatory practices. Every four years, real estate professionals are tested again on ethics when they renew their license.

A resident can take preventive measures to experiencing discrimination by looking up a real estate professional on CalBRE's website to find a violation. Once a resident files a claim with CalBRE and the licensed professional is found in violation, the violation will be noted in the professional's record. Brokers are responsible for familiarizing their salespersons with the requirements of Federal and State laws relating to discrimination. If the salesperson violates these laws, both the salesperson and the broker will have the violation referenced on their online record.

Residents can submit a claim to CalBRE by mail, in person, or online. Instructions for filing a complaint specifically reference what complaints CalBRE will handle. A few types of complaints are referenced, including real estate brokers or salespersons that mislead or defraud a consumer; however, there is no mention of discrimination based on any of the protected classes. It is reasonable to assume that the average person with a discrimination claim would believe that CalBRE is not the place to obtain assistance. Fair housing protection is absent on the claim form as well.

A review of CalBRE's website and current publications shows limited amounts of information related to housing choice discrimination, either for licensed professionals or residents. CalBRE has a dispute resolution web page with no mention of discrimination. It has online guides for tenants renting a home (avoiding fraud is the big concern), yet no mention of discrimination, such as a number to call if tenants believe they are being treated unfairly. CalBRE's web page issues consumer alerts, though none are about fair housing choice. However, a resident with discrimination concerns will get the best information by calling CalBRE, which will provide the caller with information about filling a claim and direct them appropriately.

Professional Code of Ethics Breach

Beyond CalBRE's requirements, real estate professionals are held to a code of ethics mandated by either CAR/NAR or CAREB/NAREB, depending on their membership and their local board of real estate professionals.

NAR has a professional code of conduct, which specifically prohibits unequal treatment in professional services or employment practices on the basis of "race, color, religion, sex, handicap, familial status, or national origin" (Article 10, NAR Code of Ethics). Both associations prohibit members from promulgating deed restrictions or covenants based on race.

Article 10 of the NAR Code of Ethics provides that "Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin."

A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations on Realtors and is also a firm statement of support for equal opportunity in housing. A Realtor who suspects discrimination is instructed to call the local Board of Realtors. Local Boards of Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase, or rental of housing. Local Boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards, procedures, and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

CAR has many local associations throughout the state. Stanislaus County is served by the Central Valley Association of Realtors (CVAR). CVAR holds local real estate members to the professional code of ethics. A resident complaint will be reviewed by the Professional Standards Committee for validity and action.

Similarly, NAREB Realtists follow a strict code of ethics stating that "any Realtist shall not discriminate against any person because of race, color, religion, sex, national origin, disability, familial status, or sexual orientation" (Part I, Section 2, NAREB Code of Ethics) in the sale or rental of real property, in advertising the sale or rental of real property, in the financing of real property, or in the provision of professional services.

Part I, Section 2 of the NAREB Code of Ethics continues to state that any "Realtist shall not be instrumental in establishing, reinforcing, or extending any agreement or provision that restricts or limits the use or occupancy of real property to any person or group of persons on the basis of race, color, religion, sex, national origin, disability, familial status, or sexual orientation."

CAREB, NAREB's state chapter, has 13 local chapters across California. Stanislaus County has a local chapter in Modesto called the Central Valley Realist Association.

Outreach and Education

By reaching out to its members with educational opportunities, such as in fair housing law and best practices, the real estate field can have a significant impact on improving fair housing practices in Stanislaus County.

CVAR does not directly offer fair housing educational courses. CAR, however, offers continuous online courses dealing with fair housing requirements and issues. CAR's online license renewal program is available at a nominal fee to CAR members. As part of CAR's online license renewal program, CAR offers a suite of real estate courses. "Fair Housing" is CAR's course that educates Realtors on the history of fair housing as well as on current fair housing laws. According to the course description, the course will provide an overview of Federal fair housing laws and an in-depth discussion of individual laws and their application to the practice of real estate. The course also provides CAR members with a study of the State of California's fair housing laws and regulations. The course emphasizes anti-discriminatory conduct that all licensees should practice and concludes by discussing the voluntary affirmative action marketing program and why promoting fair housing laws is a positive force at work in California and throughout the nation.

NAREB was formed by African American real estate professionals out of a need to secure equal housing opportunities regardless of race, creed, or color. NAREB passes down its mission of "promoting democracy in housing" to its state and local chapters, and offers trainings and multiple conferences. NAREB's California Chapter offers statewide conferences to educate its members. The most recent conference was held in October 2014: State of Housing in Black California – The Stolen American Dream.



Stanislaus County, on behalf of the Stanislaus Urban County members, and the City of Turlock provide annual CDBG funds to a local fair housing nonprofit Project Sentinel to provide fair housing outreach and education to local real estate professionals.

RENTAL AND PROPERTY MANAGEMENT

Renters constitute a significant portion of the population in Stanislaus County. California is the nation's largest rental market, providing approximately 5.9 billion rental units and homes for 17 million residents.⁸ According to the U.S. Census, Stanislaus County's housing units consist of 40.9 percent rental units (approximately 68,000 units), which is a higher than the national average at 34 percent. California's overall rental rate is higher at 44 percent.⁹

According to the San Joaquin Valley Fair Housing and Equity Assessment, the valley "is home to a disproportionate number of economically and socially vulnerable populations, including farm workers, immigrants, renters, homeowners facing foreclosure, and people with disabilities." Additionally, non-Whites face more challenges in the housing market due to their "economic conditions, immigration status, linguistic isolation, and larger family size." Many of these vulnerable populations will be seeking to rent, putting great responsibility on property management companies and owners to use non-discriminatory practices.

When looking to rent their property, landlords and property management companies want to find responsible and reliable tenants while also following fair housing laws. An unclean or irresponsible tenant

⁸ California Apartment Association, www.caanet.org/industry (February 24, 2015).

⁹ American Community Survey, 2008–2012.

can cost the owner additional time and money. However, it is equally important for landlords to understand fair housing laws and implement fair housing practices.

Rental and Property Management – Self-Regulated

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. CAA incorporated in 1941 to serve rental property owners and managers throughout California. CAA represents rental housing owners and professionals who together manage more than 1.5 million rental units. CAA has a local association that services Mariposa, Stanislaus, and Tuolumne counties called CAA-Central Valley. The Central Valley office is located in Modesto.

CAA supports the spirit and intent of all local, State, and Federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. When signing up to become a member of the California Apartment Association, new members agree to abide by the following provisions of their Code of Ethics and Code of Equal Housing Opportunity. The Code of Equal Housing Opportunity reads as follows:

- ◆ We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;
- ◆ We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;
- ◆ We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and
- ◆ We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.

CAA provides members with tenant screening services, application forms, and other types of landlord-tenant forms, which if used by CAA members provide legal procedures for processing rental applications and resolving tenant issues. Further, should landlords stay within these guidelines, they will likely avoid committing housing violations.¹⁰ CAA offers a landlord helpline where landlords can call and speak to an attorney about their responsibilities. Lastly, all members receive a fair housing flyer to post on-site at their properties which states that it is illegal to discriminate based on the protected classes.

When CAA receives complaints about potential fair housing violations, the association provides tenants with information on their rights and then refers them to the California Department of Fair Employment and Housing to file a claim. The Executive Director of CAA's Central Valley branch stated that her experience has been that most tenant complaints are about non-CAA members. The director said that these non-CAA members are "mom and pop" shops with little training and are unaware of the laws. For this reason, CAA makes additional efforts to try to reach these smaller operations through outreach events and the landlord helpline.

¹⁰ Conversation with CAA Executive Director, Fresno branch, 2/26/15.

Local Property Management Companies

Some of the largest rental companies in Stanislaus County¹¹ include Liberty Property Management, Cornerstone Property Management, Matel Realtors, Marshall Perry, GreenGate Property Management, and Stanislaus Property Management. Half of these management companies are CAA members.

Outreach and Education

CAA offers a Certificate in Residential Management, which requires a course on fair housing law. In addition, the CAA website provides links to the Fair Housing Institute and Fair Housing Network. Members receive CAA Issue Insight, an online publication that provides in-depth discussion of fair housing or landlord-tenant issues. CAA offers training opportunities across the state and in Modesto. CAA has a landlord helpline open Monday through Friday where landlords can ask questions about landlord-tenant issues and property management. Questions can be submitted online or over the phone. CAA also provides free forms online to its members, such as rental applications and lease agreements. CAA provides fair housing information to renters at outreach events.

Small “Mom and Pop” Owners

It is important to analyze small mom and pop owners in the Stanislaus Urban County and the City of Turlock because they are most likely to unintentionally commit fair housing violations; however, they are the most difficult to reach and their relative size is unknown. These owners constitute an individual or a small group of individuals that rent one or a few units; they generally have less training and professional background. Renting property is a secondary business for them and often not their main profession. Further, they often form verbal contracts with tenants instead of written contracts, and they are unfamiliar with their rights and responsibilities.

CAA reports that the majority of mom and pop owners do not have ownership with CAA and are deterred by the time and cost to join, even though the actual benefits of joining outweigh the costs when they run into issues. CAA also finds that the majority of landlords who call the helpline are these mom and pop owners. CAA encourages them to attend training and to utilize services as members.

With less training, the typical means of housing associations to prevent fair housing violations is less effective. Until these owners seek more training, claims brought by individuals remain the primary means of educating and enforcing fair housing laws with these individuals. (See the Fair Housing Complaints and Enforcement section for more information). Educating potential tenants on their fair housing rights is key to enforcement in these circumstances. Increasing efforts to reach and train private owners would also be beneficial.

Stanislaus County, on behalf of the Stanislaus Urban County members, and the City of Turlock provide annual CDBG funds to a local fair housing nonprofit Project Sentinel to provide fair housing outreach and education to local Realtors and small mom and pop owners.

Financial Institutions and Mortgage Lending

See section on Mortgage Lending.

¹¹ According to Mark Gallvan, Case Manager, at Project Sentinel for fair housing and land-lord tenant issues.

Advertisement

In February 2015, a review of rental housing advertisements for all of Stanislaus County and City of Turlock was conducted to identify any fair housing impediments. Advertisements were examined for language that explicitly or implicitly indicated that housing would not be made available to persons based on membership in a protected class or that there would be preferences for or bias against persons belonging to a protected class. No advertisements were found that would indicate unfair housing practices.

Fifty rental advertisements were surveyed across 11 sources including property management companies, newspapers, and other online listings. The following sources were reviewed:

- ◆ Liberty Property Management
- ◆ Cornerstone Property Management
- ◆ Matel Realtors
- ◆ Marshall Perry Inc.
- ◆ GreenGate Property Management
- ◆ Stanislaus Property Management
- ◆ Rent.com
- ◆ Craigslist.org
- ◆ ApartmentGuide.com
- ◆ Ceres Courier
- ◆ Turlock Journal

Use of Restrictive Covenants

Covenants that restrict the ownership or use of real property based on membership in a protected class are prohibited under State and Federal law. Nonetheless, recorded documents with these terms persist.

Today, the California Department of Real Estate reviews Covenants, Conditions, and Restrictions (CC&Rs) for all subdivisions of five or more lots and for condominiums of five or more units. This review is authorized by the Subdivided Lands Act and mandated by the Business and Professions Code, Section 11000. The review includes a wide range of issues, including compliance with fair housing law.

Since 2000, California State law has required that any person or entity providing declarations, deeds, and other governing documents related to the use of real property must place a cover page over the document or a stamp on the first page of the document containing a statement that any restrictive covenants that may appear in the document are null and void and that any person with an interest in the property has the right to request that the language be removed.

Summary of Private Sector Practices

While the private industry sets standards and policies, there is no internal tracking as to whether members are following those policies and practices as related to fair housing. Providing more education and outreach may help improve practices. Given the data on complaints, there appears to be a lack of knowledge regarding the obligation of landlords and property managers to make reasonable accommodations for disabled persons and to rent to them without regard to disability.

Mortgage Lending (HMDA Data)

Lending practices in the private sector may impact a household's access to housing. A key aspect of fair housing choice is equal access to credit for the purchase of a home. In the past, financial institutions did not always employ fair lending practices. Credit market distortions and other activities such as redlining prevented some groups from having equal access to credit.¹² This section reviews the lending practices of financial institutions and the access to financing from all households, particularly minority households and those of very low and low incomes.

Community Reinvestment Act

The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. CRA's purpose is to encourage regulated financial institutions to meet the credit needs of entire communities, including very low- and low-income persons and neighborhoods. It is codified under Title 12 Section 2901 of the United States Code (12 U.S.C. § 2901) and implemented by regulations under Title 12, Section 228 of the Code of Federal Regulations (12 C.F.R. § 228). Under CRA, a lending institution must disclose its lending activity by geographic area and type of lending. The Federal Financial Institutions Examination Council (FFIEC), a Federal interagency, coordinates among several Federal bodies to conduct an examination of the lending institution's activities. This examination results in a rating based on several factors. Those that have a poor rating may be required to improve community lending practices as a condition of regulatory agency approval for certain activities such as branch openings, acquisitions, and mergers. CRA has undergone several legislative changes since 1977 and was substantially revised in 2005.

Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975 (12 U.S.C. §2801) and implemented by the Consumer Financial Protection Bureau (CFPB) under Regulation C (12 C.F.R. § 1003), requires lending institutions to report public loan data. Analyzing this data can reveal patterns of lending by race and location that may indicate discriminatory practices in mortgage lending.

To prepare this analysis, 4,727 records of lender actions were pulled from the 2013 HMDA data set (for calendar year 2013) for Stanislaus County and the City of Turlock. These lender actions represent a lenders' response to a request from a consumer to obtain a new home loan to purchase a primary residence.

Lender actions related to home improvement loans, refinancing, and to purchase properties that will not be owner-occupied were excluded. Lender actions that did not show a loan type were also excluded, as were records of loan transactions between banks and "pre-approval" requests.¹³

Lending Action Volume by Race and Ethnicity

Tables 33 and **34** provide a summary of the results of home loan applications by race and ethnicity for Stanislaus County. Originations indicate loan applications that were approved. Denials indicate loan applications that were accepted as complete applications with the proper paperwork but were denied. Failures indicate applications that were not accepted as complete applications with the proper paperwork

¹² Redlining is a now illegal and discontinued practice where banks would not extend mortgage credit to purchase homes in certain areas. The banks would use maps wherein these areas were marked with red ink.

¹³ Please see the note at the end of this section for a technical discussion of how the raw HMDA data was filtered to create the data set analyzed.

because they were closed for incompleteness, withdrawn by the applicant, or approved but not accepted. Approved but not accepted means that customary loan-commitment or loan-closing conditions such as an acceptable property survey, an acceptable title insurance binder, clearing title requirements, or clearing a termite inspection were not met. As shown in **Table 33**, persons reporting White made up more than 75 percent of loan applications in Stanislaus County. As shown in **Table 34**, roughly 32 percent of loan applicants were persons reporting ethnicity as Hispanic or Latino.

Table 33
2013 Lending Action by Race, Stanislaus County

| Race | Total Applications | Denials | Failures | Originations |
|---|--------------------|---------|----------|--------------|
| American Indian or Alaska Native | 100 | 15 | 17 | 68 |
| Asian | 342 | 58 | 70 | 214 |
| Black or African American | 82 | 15 | 10 | 57 |
| Native American or Other Pacific Islander | 58 | 9 | 9 | 40 |
| White | 3,732 | 451 | 616 | 2,665 |
| Other or No Info Provided | 413 | 79 | 92 | 242 |
| Total | 4,727 | 627 | 814 | 3,286 |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: White includes Hispanic or Latino persons.

Table 34
2013 Lending Action by Ethnicity, Stanislaus County

| Ethnicity | Total Applications | Denials | Failures | Originations |
|------------------------|--------------------|---------|----------|--------------|
| Hispanic or Latino | 1,504 | 218 | 269 | 1,017 |
| Not Hispanic or Latino | 2,854 | 341 | 460 | 2,053 |
| Other or no info | 369 | 68 | 85 | 216 |
| Total | 4,727 | 627 | 814 | 3,286 |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Figures 1 and 2 provide a visual comparison of the share of loan applications by race in 2013 (**Figure 1**) to the share of the whole population by race in 2013 (**Figure 2**). When compared to the general population of Stanislaus County (per the 2013 ACS), the data set is roughly representational. Persons reporting race as Black or African American were slightly underrepresented as loan applicants, while persons reporting race as Asian and White were slightly overrepresented as loan applicants.

Figure 1
2013 Loan Applications by Race, Stanislaus County

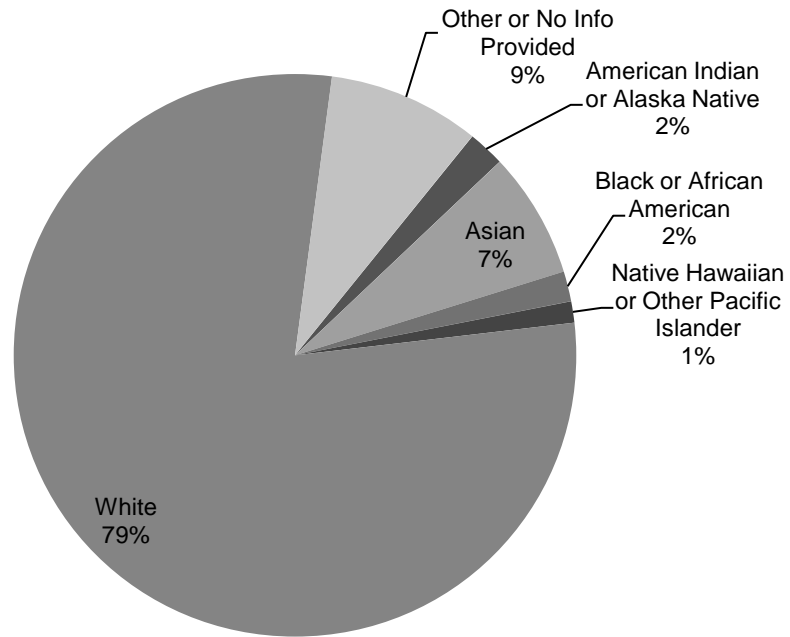
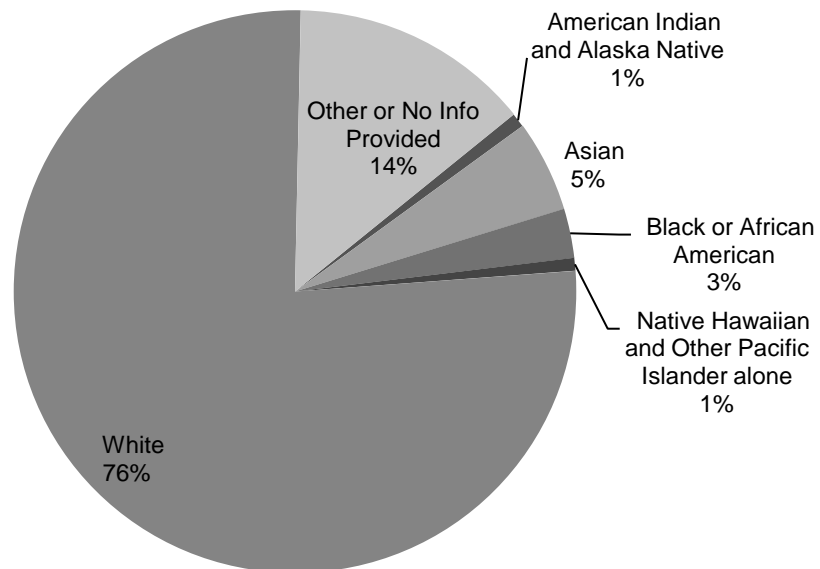


Figure 2
2013 Population by Race, Stanislaus County

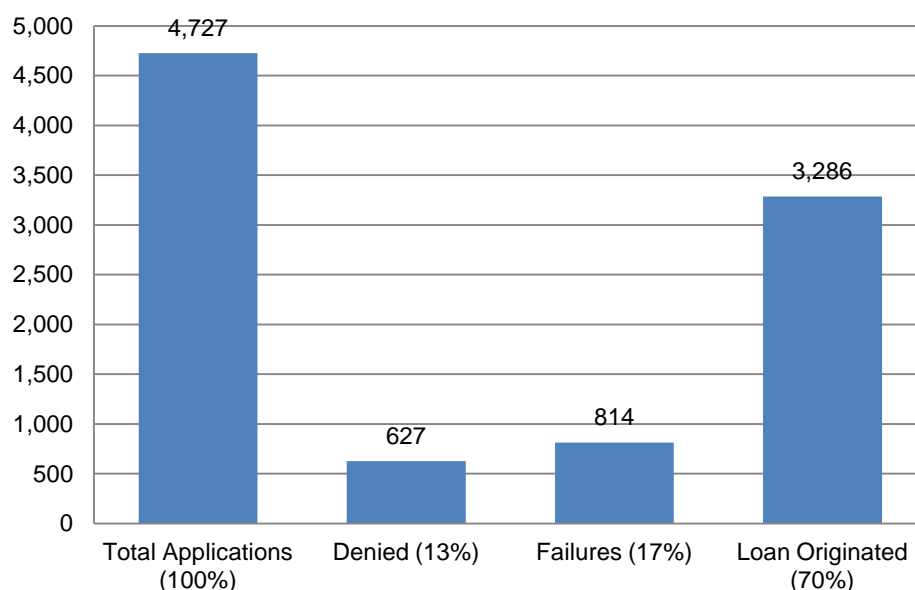


Lending Action Rates by Race and Ethnicity

To reveal differences in lending action rates by race and ethnicity, histograms were created to compare the rate of outcomes by race and ethnicity.¹⁴ The histograms are scaled to be roughly equal in size so that differences in lending volume are minimized.

In the overall data set (**Figure 3**), approximately 13 percent of all applications were denied and 17 percent resulted in failure. Seventy percent of all applications resulted in loan origination.

Figure 3
2013 All Loan Applications, Stanislaus County



American Indian or Alaska Native

For persons in the American Indian or Alaska Native racial category, the origination rate was slightly lower than for the overall population and the denial rate slightly higher. The denial rate was 15 percent and the loan origination rate was 68 percent.

As shown in **Table 35**, the Unincorporated County had the largest share of denied loan applications. However, these rates are essentially meaningless because only fifteen applications were denied for persons in the American Indian or Alaska Native racial category in 2013. There was one denial in the City of Turlock.

¹⁴ It should be noted that the variable used to segregate the data by race and ethnicity was "Applicant Race 1" and "Applicant Ethnicity." Co-applicant information and other races reported by the applicant were not considered.

Figure 4
2013 Lending Actions for American Indian or Alaska Native

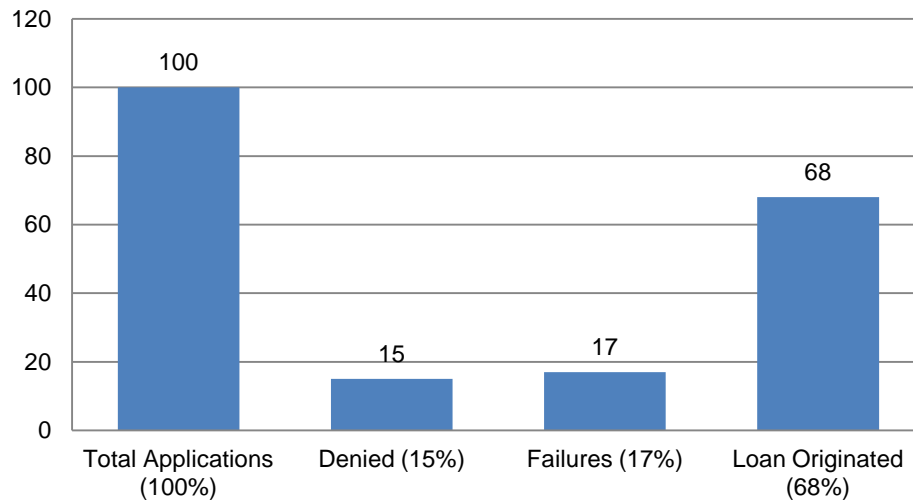


Table 35
2013 Lending Actions for American Indian or Alaska Native by Area, Stanislaus County

| Jurisdiction | Total Applications | Denials | | Failures | | Originations | |
|---------------------------|--------------------|---------|------------|----------|------------|--------------|------------|
| | | Number | Percentage | Number | Percentage | Number | Percentage |
| Stanislaus Urban County | | | | | | | |
| Ceres | 13 | 0 | 0% | 3 | 18% | 10 | 15% |
| Hughson | 2 | 0 | 0% | 0 | 0% | 2 | 3% |
| Newman | 3 | 1 | 7% | 0 | 0% | 2 | 3% |
| Oakdale | 4 | 1 | 7% | 0 | 0% | 3 | 4% |
| Patterson | 4 | 1 | 7% | 1 | 6% | 2 | 3% |
| Waterford | 3 | 1 | 7% | 0 | 0% | 2 | 3% |
| Unincorporated County | 21 | 3 | 20% | 5 | 30% | 13 | 19% |
| Entitlement Jurisdictions | | | | | | | |
| Turlock | 7 | 1 | 7% | 1 | 6% | 5 | 7% |
| Stanislaus County Total | 100 | 15 | 100% | 17 | 100% | 68 | 100% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Hawaiian or Pacific Islander

For persons in the Hawaiian or Pacific Islander racial category, the origination rate and the failure rate were slightly lower and the denial rate slightly higher than for the overall population.

As shown in **Table 36**, Ceres had the largest share of loan applications resulting in denial. However, these rates are essentially meaningless because only nine applications were denied for persons in the Hawaiian or Pacific Islander racial category in 2013. There was one denial in the City of Turlock.

Figure 5
2013 Lending Actions for Hawaiian or Pacific Islander

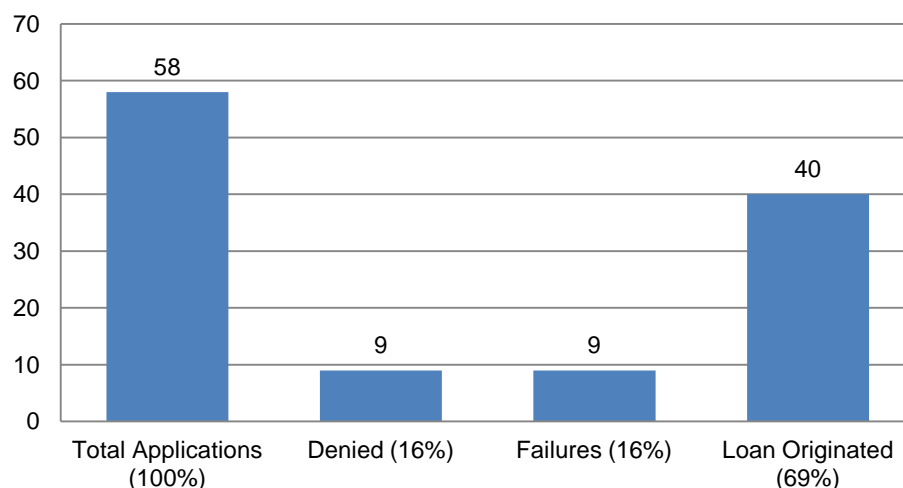


Table 36
2013 Lending Actions for Hawaiian or Pacific Islander by Area, Stanislaus County

| Jurisdiction | Total Applications | Denials | | Failures | | Originations | |
|---------------------------|--------------------|---------|------------|----------|------------|--------------|------------|
| | | Number | Percentage | Number | Percentage | Number | Percentage |
| Stanislaus Urban County | | | | | | | |
| Ceres | 7 | 3 | 33% | 1 | 11% | 3 | 8% |
| Patterson | 4 | 1 | 11% | 0 | 0% | 3 | 8% |
| Waterford | 1 | 0 | 0% | 0 | 0% | 1 | 3% |
| Unincorporated County | 4 | 1 | 11% | 0 | 0% | 3 | 8% |
| Entitlement Jurisdictions | | | | | | | |
| Turlock | 4 | 1 | 11% | 0 | 0% | 3 | 8% |
| Stanislaus County Total | 58 | 9 | 100% | 9 | 100% | 40 | 100% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Black or African American

For persons in the Black or African American racial category, the denial rate was lower than the overall population and the failure rate higher. The denial rate was also lower than for other racial categories. The origination rate was the same as for the overall population. Lenders denied almost one in five loan applications, and about one in eight applications resulted in failure.

As shown in **Table 37**, Patterson had the largest share of loan applications resulting in denial. Since there are few applications that resulted in denial, these rates are not very meaningful. There was one denial in the City of Turlock.

Figure 6
2013 Lending Actions for Black or African American

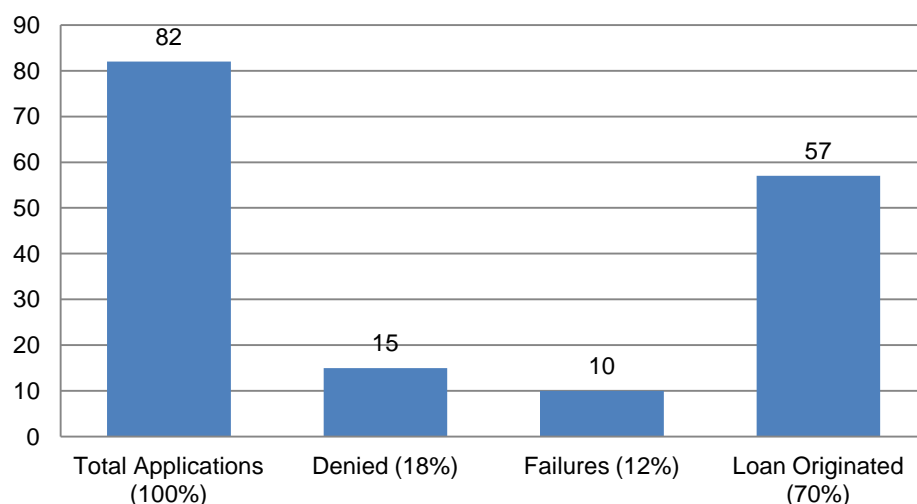


Table 37
2013 Lending Actions for Black or African American by Area, Stanislaus County

| Jurisdiction | Total Applications | Denials | | Failures | | Originations | |
|---------------------------|--------------------|---------|------------|----------|------------|--------------|------------|
| | | Number | Percentage | Number | Percentage | Number | Percentage |
| Stanislaus Urban County | | | | | | | |
| Ceres | 4 | 2 | 13% | 0 | 0% | 2 | 4% |
| Hughson | 1 | 0 | 0% | 0 | 0% | 1 | 2% |
| Newman | 2 | 1 | 7% | 0 | 0% | 1 | 2% |
| Patterson | 23 | 4 | 27% | 5 | 50% | 14 | 25% |
| Unincorporated County | 10 | 0 | 0% | 2 | 20% | 8 | 15% |
| Entitlement Jurisdictions | | | | | | | |
| Turlock | 2 | 1 | 7% | 0 | 0% | 1 | 2% |
| Stanislaus County Total | 82 | 15 | 100% | 10 | 100% | 57 | 100% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Other or No Information

For persons in the Other or No Information racial category, the records that indicated a race of “other” or where no race information was provided had higher denial and failure rates than the overall population and the origination rate was lower. Twenty-two percent of loan applications resulted in failure and nineteen percent resulted in denial.

As shown in **Table 38**, the Unincorporated County had the largest share of loan applications resulting in denial, followed by Ceres and Patterson. There were six denials in the City of Turlock, consisting of 8 percent of denials in *Stanislaus* County.

Figure 7
2013 Lending Actions for Other or No Information

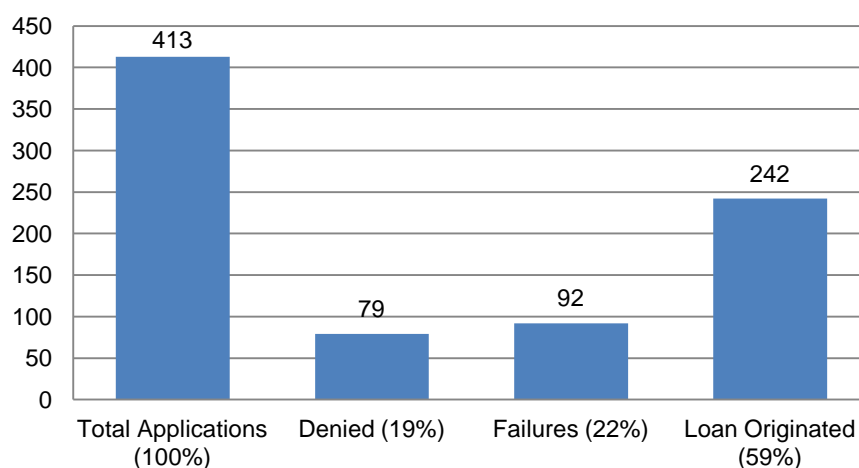


Table 38
2013 Lending Actions for Other or No Information by Area, Stanislaus County

| Jurisdiction | Total Applications | Denials | | Failures | | Originations | |
|---------------------------|--------------------|---------|------------|----------|------------|--------------|------------|
| | | Number | Percentage | Number | Percentage | Number | Percentage |
| Stanislaus Urban County | | | | | | | |
| Ceres | 38 | 8 | 10% | 12 | 13% | 18 | 7% |
| Hughson | 10 | 1 | 1% | 3 | 3% | 6 | 2% |
| Newman | 8 | 1 | 1% | 2 | 2% | 5 | 2% |
| Oakdale | 29 | 7 | 9% | 5 | 5% | 17 | 7% |
| Patterson | 40 | 8 | 10% | 12 | 13% | 20 | 8% |
| Waterford | 15 | 4 | 5% | 3 | 3% | 8 | 3% |
| Unincorporated County | 87 | 19 | 24% | 22 | 24% | 46 | 19% |
| Entitlement Jurisdictions | | | | | | | |
| Turlock | 60 | 6 | 8% | 9 | 10% | 45 | 19% |
| Stanislaus County Total | 413 | 79 | 100% | 92 | 100% | 242 | 100% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Asian

Persons in the Asian racial category had higher denial and failure rates than the overall population and the origination rate was lower. About 1 in 6 applications were denied and another 1 in 5 applications resulted in failure.

As shown in **Table 39**, the Unincorporated County had the largest share of denied loan applications, followed by Ceres. There were seven denials in the City of Turlock, consisting of 12 percent of denials in Stanislaus County.

Figure 8
2013 Lending Actions for Asian

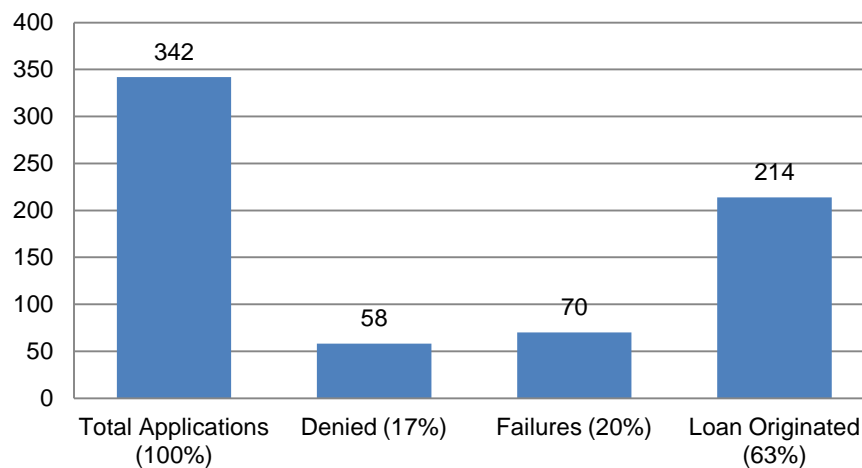


Table 39
2013 Lending Actions for Asian by Area, Stanislaus County

| Jurisdiction | Total Applications | Denials | | Failures | | Originations | |
|---------------------------|--------------------|---------|------------|----------|------------|--------------|------------|
| | | Number | Percentage | Number | Percentage | Number | Percentage |
| Stanislaus Urban County | | | | | | | |
| Ceres | 52 | 9 | 16% | 12 | 17% | 31 | 14% |
| Oakdale | 8 | 1 | 2% | 1 | 1% | 6 | 3% |
| Patterson | 33 | 5 | 9% | 8 | 11% | 20 | 9% |
| Waterford | 2 | 0 | 0% | 1 | 1% | 1 | 0% |
| Unincorporated County | 56 | 21 | 37% | 7 | 10% | 26 | 12% |
| Entitlement Jurisdictions | | | | | | | |
| Turlock | 47 | 7 | 12% | 6 | 9% | 34 | 16% |
| Stanislaus County Total | 342 | 58 | 100% | 70 | 100% | 214 | 100% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

White

For persons in the White racial category, the origination rate was slightly higher than the overall population and higher than all other subgroups, with denials lower than the aggregate and other subgroups. It is more likely that a loan was originated for an applicant reporting race as White. Hispanic or Latino persons are included in the White racial category.

As shown in **Table 40**, the Unincorporated County had the largest share of loan applications resulting in denial, followed by the City of Turlock and Ceres. There were forty-nine denials in the City of Turlock, consisting of 11 percent of denials in Stanislaus County.

Figure 9
2013 Lending Actions for White

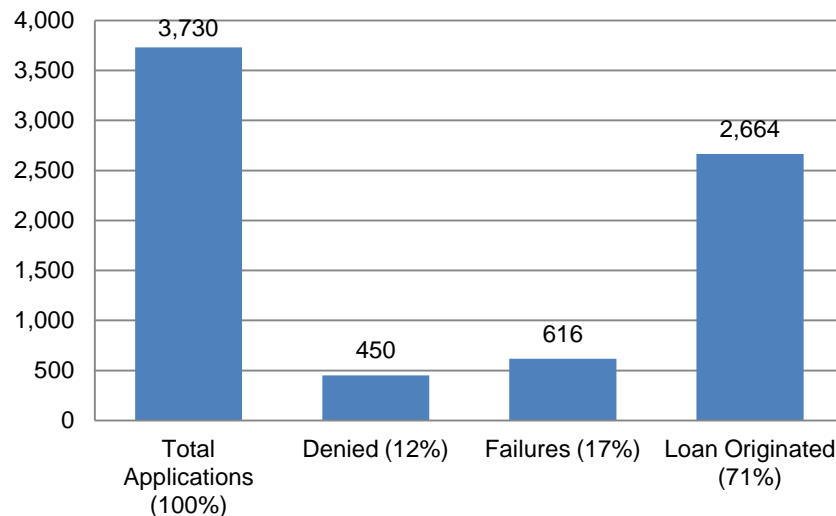


Table 40
2013 Lending Actions for White by Area, Stanislaus County

| Jurisdiction | Total Applications | Denials | | Failures | | Originations | |
|---------------------------|--------------------|---------|------------|----------|------------|--------------|------------|
| | | Number | Percentage | Number | Percentage | Number | Percentage |
| Stanislaus Urban County | | | | | | | |
| Ceres | 329 | 43 | 10% | 64 | 10% | 222 | 8% |
| Hughson | 103 | 6 | 1% | 16 | 3% | 81 | 3% |
| Newman | 81 | 17 | 4% | 11 | 2% | 53 | 2% |
| Oakdale | 255 | 30 | 7% | 36 | 6% | 189 | 7% |
| Patterson | 173 | 26 | 6% | 31 | 5% | 116 | 4% |
| Waterford | 101 | 14 | 3% | 19 | 3% | 68 | 3% |
| Unincorporated County | 744 | 102 | 23% | 111 | 18% | 531 | 20% |
| Entitlement Jurisdictions | | | | | | | |
| Turlock | 486 | 49 | 11% | 74 | 12% | 363 | 14% |
| Stanislaus County Total | 3,730 | 450 | 100% | 616 | 100% | 2,664 | 100% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Hispanic

When the data is grouped by applicants that responded as Hispanic, Not Hispanic, and No information provided for Hispanic ethnicity, denial, failure, and origination rates varied from the aggregate. Applicants who reported Hispanic showed a slightly greater share of denials and failures and a slightly lower share of approvals when compared to the aggregate.

As shown in **Table 41**, the Unincorporated County had the largest share of denied loan applications, followed by Ceres and Patterson. There were nineteen denials in the City of Turlock, consisting of 9 percent of denials in Stanislaus County.

Figure 10
2013 Loan Actions for Hispanic

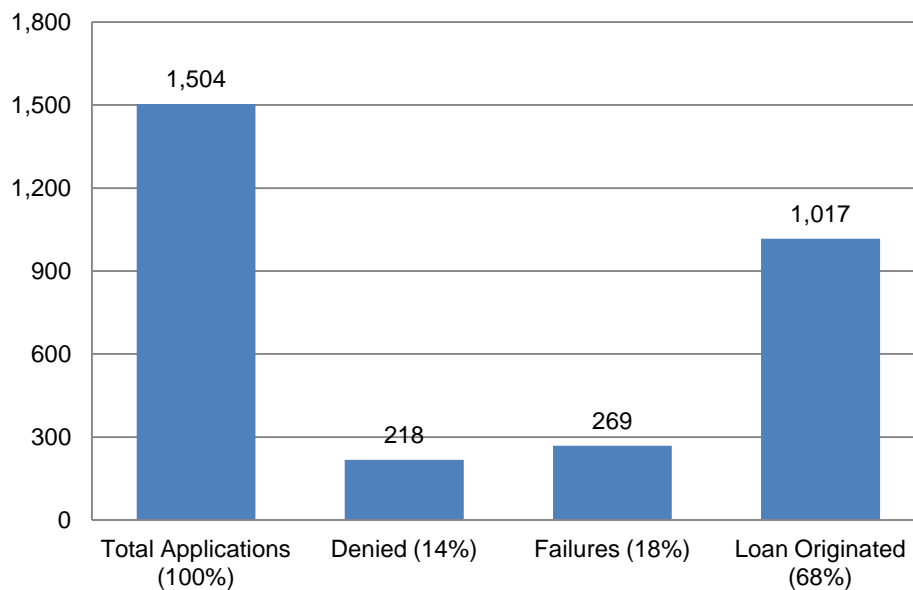


Figure 11
2013 Loan Actions for Non-Hispanic

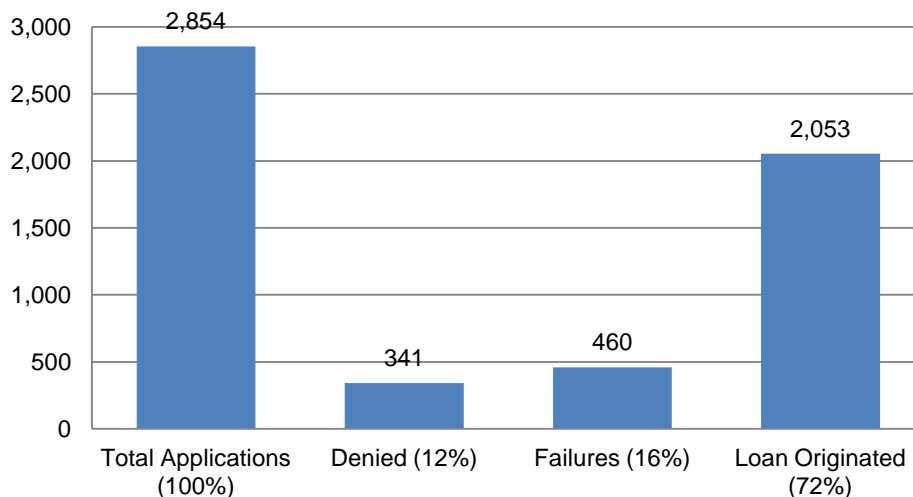


Figure 12
2013 Loan Actions for Ethnicity No Information Provided

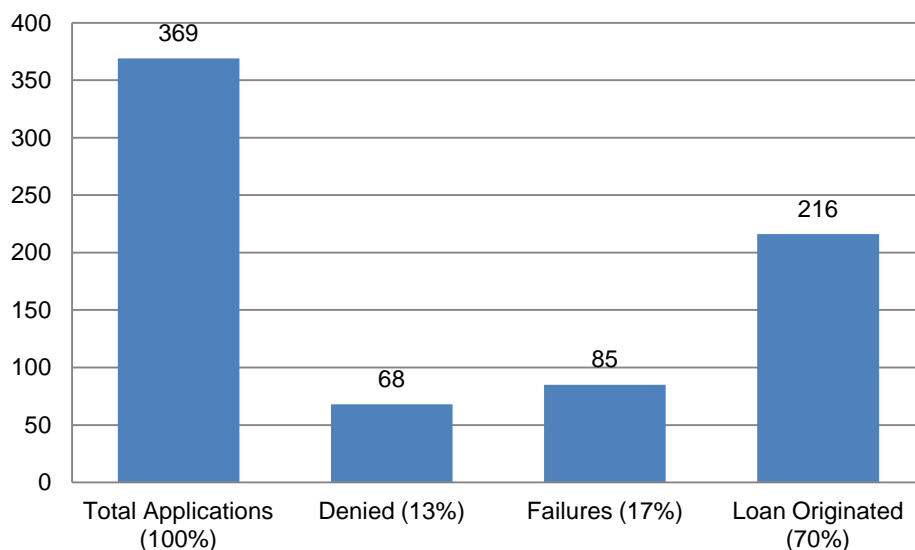


Table 41
2013 Lending Actions for Hispanic by Area, Stanislaus County

| Jurisdiction | Total Applications | Denials | | Failures | | Originations | |
|---------------------------|--------------------|---------|------------|----------|------------|--------------|------------|
| | | Number | Percentage | Number | Percentage | Number | Percentage |
| Stanislaus Urban County | | | | | | | |
| Ceres | 233 | 32 | 15% | 47 | 17% | 154 | 15% |
| Hughson | 33 | 3 | 1% | 6 | 2% | 24 | 2% |
| Newman | 55 | 13 | 6% | 8 | 3% | 34 | 3% |
| Oakdale | 48 | 5 | 2% | 8 | 3% | 35 | 3% |
| Patterson | 121 | 21 | 10% | 18 | 7% | 82 | 8% |
| Waterford | 41 | 6 | 3% | 10 | 4% | 25 | 2% |
| Unincorporated County | 254 | 38 | 18% | 37 | 14% | 179 | 17% |
| Entitlement Jurisdictions | | | | | | | |
| Turlock | 159 | 19 | 9% | 23 | 9% | 117 | 12% |
| Stanislaus County Total | 1,502 | 217 | 100% | 269 | 100% | 1,016 | 100% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Mortgage Lending by Area

The same data set used to analyze mortgage lending by race and ethnicity was used to analyze mortgage lending by area. The HMDA data reports loans by the census tract of the home being purchased. The goal of this analysis is to detect whether there are geographic patterns of mortgage credit availability, and specifically whether there are any correlations between availability of home loans with geographic race, ethnicity, or income characteristics.

Loan applications were analyzed by census tract and mapped. All areas in Stanislaus County were mapped by quartile and show the volume and rate of each lending action: origination, denial, and failure. Lending action maps are located in **Appendix 4**.

HMDA data is organized into the 89 countywide census tracts (2000 census tract boundaries). Seventy percent of loan applications across all census tracts in Stanislaus County resulted in origination, 17 percent resulted in failure, and 13 percent resulted in denial. The lending action data indicates that origination is more likely than failure for Stanislaus County as a whole; however at the census tract level, some areas in Stanislaus County have much smaller shares of loan origination.

As shown in the origination rate map, found in **Appendix 4** (mapped rates of origination by countywide quartiles), the areas that fall within the highest quartile (74.9 percent to 86.7 loan origination rates) are located in and around the cities of Turlock, Hughson, Modesto, and Oakdale.

Areas that fall within the mid-range quartiles for rates of origination (62.6 percent to 74.8 percent) consist of a majority of Stanislaus County and include unincorporated areas in the southwestern and eastern portions of Stanislaus County, including Patterson and Newman.

The lowest quartile for rates of origination is made up of census tracts with 62.5 percent or less of actions resulting in loan origination. The areas making up the lowest quartile rate of origination include portions in the center of Stanislaus County in and around Modesto and Ceres and south of the City of Turlock.

Of those census tracts that fall within the lower quartile, three have a share of less than 50 percent origination, meaning it is more likely for loan applications to result in failure than origination. **Table 42** displays census tracts with less than 50 percent loan origination. The census tracts shown in **Table 42** with significantly low rates of origination are 16.04 (42 percent), 22 (41 percent), and 26.02 (47 percent).

Two of these census tracts have so few application records that the resulting rates are meaningless (16.04 and 22). The remaining census tract (26.02) is located in Ceres. It is important to put this census tract with a low origination rate into context with the characteristics of the census tract. These characteristics include minority concentration, Hispanic concentration, and low/moderate-income concentration.

Minority Concentration

Census tract 26.02 has a concentration of minorities that is similar to that of Stanislaus County as a whole. This census tract has a minority population share that is in the range of 8.55 to 13.28 percent (see **Map 11** in **Appendix 5**).

Hispanic Concentration

Census tract 26.02 has a highly concentrated population of Hispanic individuals. The concentration of Hispanic persons in the census tract is 52 percent (see **Map 12** in **Appendix 5**).

Low/Moderate-Income Concentration

As described in the Con Plan, areas with a low/moderate-income population greater than 51 percent of total households are considered to be target areas. Census tract 26.02 is located in a low/moderate-income area with a low/moderate-income population share that ranges between 51 and 75 percent (see **Map 13** in **Appendix 5**).

Table 42
2013 Lending Actions for Census Tracts with
Less than 50 Percent Origination Rate, Stanislaus County

| Census Tract | Location | Total Applications | Denials | Failures | Originations |
|--------------|----------|--------------------|---------|----------|--------------|
| 16.04 | Modesto | 19 | 26% | 32% | 42% |
| 22 | Modesto | 22 | 27% | 32% | 41% |
| 26.02 | Ceres | 38 | 18% | 34% | 47% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Geographic Distribution of High Priced Loans

Under Regulation C of the Home Mortgage Disclosure Act, lenders are required to report the difference between the annual percentage rate (APR) of originated loans and the average prime offer rate. The prime rate is the rate that prime borrowers can expect to receive. Subprime borrowers receive higher APRs than prime borrowers, meaning that subprime borrowers pay more for mortgage financing.

The HMDA data set reports the rate spread for all originated loans. The rate spread represents the difference between the APR and the prime rate at the time of loan purchase. Essentially, the rate spread reports the rate that borrowers pay in excess of the prime rate. For first-lien loans, lenders are required to report the rate in excess of 1.5 percent of the prime rate. For subordinate-lien loans, lenders are required to report the rate in excess of 3.5 percent. For example, if a borrower secures a first-lien mortgage with an 8 percent APR when the prime rate is 5 percent, the rate spread reported in the HMDA data set is 1.5 percent $[8 - (1.5 \times 5) = 1.5]$. Loans with a reported rate spread are considered high cost or subprime loans.

Table 43 reports the share of high priced loans originated for owner-occupied home purchases in all jurisdictions in the Stanislaus Urban County and the City of Turlock. Because HMDA data is reported by census tract, there may be some overlap of reporting between jurisdictions; however, no duplicated loan records are reported. As shown, 14.4 percent of originated loans in Stanislaus County are high priced loans. Of the cities, Newman (29.5 percent) and Ceres (19.6 percent) have the largest share of high cost loans and Hughson (7.8 percent) the lowest. The City of Turlock had forty-five high priced loans, consisting of 10 percent of the high priced loans in Stanislaus County.

Table 43
2013 High Priced Loans for Consortium Jurisdictions,
Stanislaus County

| Jurisdiction | Total Loan Originations | First-Lien High Cost Loans | Subordinate-Lien High Cost Loans | Total High Cost Loans | Percentage High Cost Loans |
|----------------------------------|--------------------------------|-----------------------------------|---|------------------------------|-----------------------------------|
| Stanislaus Urban County | | | | | |
| Ceres | 286 | 56 | 0 | 56 | 19.6% |
| Hughson | 90 | 7 | 0 | 7 | 7.8% |
| Newman | 61 | 14 | 4 | 18 | 29.5% |
| Oakdale | 215 | 17 | 2 | 19 | 8.8% |
| Patterson | 175 | 22 | 0 | 22 | 12.6% |
| Waterford | 80 | 13 | 0 | 13 | 16.3% |
| Unincorporated County | 449 | 52 | 2 | 54 | 25.3% |
| Entitlement Jurisdictions | | | | | |
| Turlock | 451 | 45 | 0 | 45 | 10.0% |
| Stanislaus County Total | 3,285 | 461 | 12 | 473 | 14.4% |

Source: Home Mortgage Disclosure Act, 2013 LAR and TS Raw Data

Note: Percentages do not add up to 100% because data for Modesto is included in the total but not called out in the table.

Note: HMDA reports data at the census tract level, making it difficult to distinguish loan action for tracts that share multiple jurisdictional boundaries. However, the data provided in the table describes general areas of Stanislaus County.

Summary of Findings

It is difficult to determine to what extent an applicant's race, ethnicity, or income characteristics influence whether a loan application is originated, denied, or fails. A complete picture is not available of the reasons why a loan application is denied or fails and whether an applicant's race, ethnicity, or income had any influence on the denial or failure of an application. However, a general description can be provided of whether any correlations exist between race, ethnicity, and income characteristics with the ultimate origination, denial, or failure of an application.

In general, it is more likely that loan application requests result in origination, meaning that a greater share of loan applications originate than fail. Loan applications for each race do not vary greatly from the aggregate results of lending actions in Stanislaus County. However, denial and failure rates of applications for racial and ethnic minorities tend to be slightly higher than the aggregate.

Applicants reporting their racial category as Asian experience lower rates of origination than all other subgroups. Sixty-three percent of all loan applications for Asian persons originated. Of the 37 percent of applications that failed to originate, 17 percent were a result of denial and 20 percent were a result of failure to be accepted, being withdrawn, or closed for incompleteness.

The higher than expected rate of denied loan applications for Asian persons signifies an opportunity to direct policies toward making homeownership opportunities more available, through pre-purchase counseling, financial literacy, nontraditional credit building, credit counseling, and alternative credit rating.

Areas of low origination rates tend to be in the central portion of Stanislaus County, particularly in and around Modesto and Ceres and south of the City of Turlock. These areas also have high concentrations of Hispanic persons and low- and moderate-income households.

Claims and Enforcement

Fair Housing Complaints and Enforcement

Patterns of complaints and enforcement are useful to assess the nature and level of potentially unfair or discriminatory housing practices in the private sector. When enforcement practices are consistent and well known, housing industry professionals are incentivized to be aware of and practice fair housing laws. The fair housing associations, similarly, encourage its members to stay better informed and well trained on fair housing laws. Fair housing trainings provided by associations may also increase as a result of professionals wanting to stay better informed. Furthermore, enforcement directly benefits the unfairly treated person and provides them a remedy. Beyond the individual and their family benefiting, multiple residents may benefit from an individual's fair housing claim because the claimant property owner/manager is better informed of fair housing laws and, after the claim is brought, they may conduct better practices.

Several public and private agencies may receive complaints about unfair housing practices or housing discrimination. At the Federal level, the Office of Fair Housing and Equal Opportunity (FHEO) of the U.S. Department of Housing and Urban Development (HUD) receives complaints of housing discrimination. FHEO will attempt to resolve matters informally. FHEO may act on those complaints if they represent a violation of Federal law and FHEO finds that there is "reasonable cause" to pursue administrative action in Federal court.

HUD has two programs that provide funds to State and local agencies to conduct fair housing activities, called the Fair Housing Assistance Program (FHAP) and the Fair Housing Initiatives Program (FHIP). California Rural Legal Assistance and Fair Housing Council of Central California are the only two FHIP grant recipients that serve Stanislaus Urban County.

At the State level, the California Department of Fair Employment and Housing (DFEH) has a similar role to FHEO. DFEH also receives, investigates, attempts to settle, and can take administrative action to prosecute violations of the law. HUD and DFEH have some overlap in jurisdiction, and depending on the nature of the case, may refer cases to one another. DFEH is a HUD FHAP grantee for California, meaning that it receives funding from HUD to enforce Federal fair housing laws in California. While multiple State or local government agencies can be FHAP grantees, DFEH is the only FHAP grantee in California.

At the local level, Stanislaus Urban County and City of Turlock provide fair housing services through Community Development Block Grant (CDBG) funds. These services are contracted out to Project Sentinel, a local nonprofit. Project Sentinel's fair housing activities are also supported by HUD FHIP grant funds.

The DFEH and local agencies enforce both Federal and State fair housing laws, whereas the FHEO only enforces Federal fair housing laws. The Federal Fair Housing Act makes it illegal to discriminate against people in the sale or rental of housing based on race/ethnicity, color, religion, familial status, disability, national origin, and gender. For California agencies, the Fair Employment and Housing Act (FEHA) and the Unruh Civil Rights Act also make it illegal to discriminate based on ancestry, marital status, sexual orientation, source of income, or any other arbitrary forms of discrimination.

Private nonprofit fair housing organizations also process complaints and provide valuable outreach and education to potential renters/buyers and housing industry professionals in the area. In addition to Project Sentinel, local groups include California Rural Legal Assistance, Community Housing and Shelter Services, Habitat for Humanity-Stanislaus, and Fair Housing Council of Central California. Additionally, national advocacy organizations like the National Fair Housing Alliance promote fair housing policies and practices on the national, state, and local levels.

The U.S. Department of Justice has authority to bring fair housing–related claims as well, although its jurisdiction is limited compared to HUD and DFEH.

HUD estimates that the number of reported complaints represents less than 1 percent of the four million instances of housing discrimination that occur each year. Claims are underreported for several reasons: (1) the buyer/renter is unaware of the unfair practices; (2) the person does not know where to go for assistance; (3) the person believes nothing will be done about the problem; or (4) the person fears negative consequences such as eviction from a current or future place.

U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity

The San Francisco HUD office provided information on fair housing complaints and cases in Stanislaus County for the period January 1, 2012, through December 31, 2014. Over this three-year period, HUD reported 25 fair housing complaints originating in Stanislaus County. Nine of those originated in the Stanislaus Urban County and two were from the City of Turlock. This is an increase in the total number of claims as compared to seven total claims brought during a previous five-year period (2005–2010). Reasons for this increase are unknown, such as whether unfair practices have increased or whether potential renters/buyers experience the same but know where to seek assistance. Other possible factors include HUD's recent increased efforts to enforce fair housing laws, including increased funds to state agencies and nonprofits for processing claims.¹⁵ Additionally, in response to the foreclosure crisis, Federal funding has increased for housing counseling services, which teach fair housing laws as part of homebuyer and rental education classes. As a result, more homebuyer and renters are aware of fair housing laws.

Each fair housing claim can be based on one or more violations against a protected class under Federal and State laws. Federal and State law differs on the types of protected classes. HUD will process claims based exclusively on Federal protected classes. For State specific categories or claims that involve both Federal and State, HUD refers those cases to DFEH. Eight of the eleven cases were transferred to or jointly filed with DFEH.

In both Stanislaus Urban County and City of Turlock, the most common basis for a claim was disability (physical or mental), reported at 90 and 100 percent, respectively. This is when an individual or a family is given different treatment in their housing selection or housing condition, such as being told no units are available to them when units are available, or a requested reasonable accommodation/repair is refused even when the tenant offers to pay. This high rate of disability bias is consistent with national and California State trends which find disability reported as the basis in about half the claims. The next highest categories in both Stanislaus Urban County and City of Turlock are retaliation and national origin. Under the Fair Housing Act, property owners or management companies cannot take negative action against a tenant for having asserted their fair housing rights. Due to the small number of claims (three in total) in Stanislaus Urban County and City of Turlock over the last three years, it may be helpful to consider the data from the entire Stanislaus County. Following, in order, Stanislaus County-wide data reveals the following order of bases, after disability: race, familial status, national origin, and sex. Except for retaliation, which is not measured as a separate basis in national data, this is parallel with national trends.

A breakdown of complaint basis for Stanislaus Urban County and City of Turlock can be found in **Tables 45 and 45.1** below. Note that the total number of complaint bases is more than the number of cases filed because each case filed can claim up to four bases.

¹⁵ National Fair Housing Alliance, *Fair Housing Trends Report (2012)*.

Two of the cases were settled or conciliated, while the other one closed due to “no cause.” Settled cases means the two parties came to an agreement, whereas cases that resulted in conciliation involve HUD as a third-party to the agreement. In conciliation, HUD is responsible for enforcing the agreement and may put additional requirements on the parties, such as requiring the landlord to complete fair housing training, and is responsible for enforcing the agreement. When a case is closed due to “no cause” this means that HUD initially found the claim to exhibit a violation of the law, but that after a thorough investigation, sufficient evidence was not found. While discrimination may have occurred, the evidence is inadequate for proving a violation.

California Department of Fair Housing and Employment (DFEH)

The California Department of Fair Employment and Housing provides records of housing complaints filed in the Stanislaus Urban County and City of Turlock. DFEH processed eighteen claims from the Stanislaus Urban County area, and eight claims from the City of Turlock from January 1, 2012, through December 31, 2014.

A claim can be filed either by phone or mail with the DFEH. Complaint forms are available online and can be submitted in English or Spanish. After a formal interview, DFEH may choose to investigate the claim, in which case the entity/individual accused is notified and given the opportunity to resolve the case informally and can do so at any time during the process. The parties are also given the opportunity, free of charge, to participate in dispute resolution or mediation. Once the investigation is complete, the case may be closed due to no violation of law, or if the case has merit, free, mandatory dispute resolution begins. If parties fail to achieve a resolution, DFEH will file the case in civil court.

The Stanislaus Urban County and City of Turlock statistics are dissimilar to statewide trends. The highest reported basis for fair housing claims was disability. In 2013, DFEH reported that most common bases statewide are, in order: disability, race/color, retaliation, and familial status. A slightly different order was reported in 2012: disability, national origin/ancestry, familial status, and race/color. In all of these years, the disability category stands well above the others, approximately one-third or one-fourth of the total. HUD and advocacy organizations have taken measures to address the need for disabled persons to access adequate housing, as discussed further in the section discussing Nonprofit Fair Housing Organizations below.

The second most common reported basis for Stanislaus Urban County was familial status. This is slightly higher than state trends. The second most common report basis for City of Turlock was a three-way tie: race, national origin, and religion. While national origin and race categories follow statewide trends, claims based on religious discrimination are less common compared to statewide statistics.

Stanislaus County and City of Turlock

Stanislaus County, on behalf of the Stanislaus Urban County’s Community Development Block Grant (CDBG), contracted with Project Sentinel, a HUD-certified fair housing agency, to carry out its Fair Housing Program. Using its own CDBG funds, The City of Turlock also contracted with Project Sentinel to provide identical fair housing services.¹⁶ Funds are used to provide services that enable and empower community members to have open and informed housing opportunities and to overcome housing discrimination. The primary objective is to enforce fair housing laws via investigation into claims of housing discrimination, as well as to raise the level of awareness of fair housing rights and responsibilities among potential renter or buyers, owners, managers, and the general public. Additional activities include providing fair housing information, housing counseling, and tenant/landlord mediation services. Project Sentinel provides housing advocacy to the residents through community forums, town hall meetings, and housing fairs.

¹⁶ The County and City of Turlock issued joint- requests for proposal for fair housing services.

Nonprofit Fair Housing Organizations

Housing advocates report that the majority of fair housing cases filed with HUD or their state FHAPs originate with private fair housing organizations. This is true in the Stanislaus Urban County and City of Turlock where the number of claims both received and processed by local nonprofits is significantly higher than the number received or processed with HUD or the California DFEH. To illustrate, in the Stanislaus Urban County and City of Turlock, Project Sentinel and California Rural Legal Assistance (CRLA) are nonprofits that processed over 130 fair housing claims over the last three years. This stands high above HUD and DFEH which only processed twenty-one claims for Stanislaus Urban County and City of Turlock. It is important to point out that CRLA and Project Sentinel engage in more fair housing activities than HUD or DFEH. HUD and DFEH process claims, whereas, these organizations not only file fair housing claims, but provide counsel or advice or will help the parties negotiate a settlement without litigation. Thus, their reported numbers of cases reflect this larger universe of activities. Habitat for Humanity-Stanislaus does not process claims; when it receives complaints, it refers them to one of the various agencies: HUD, California DFEH, CRLA, or Project Sentinel. Habitat for Humanity- Stanislaus referred approximately 150 fair housing inquiries to Project Sentinel for fair housing disputes from July 2013 to June 2014.

Additionally, most claims that originate with CRLA and Project Sentinel and proceed to litigation will be filed with HUD or DFEH for processing. CRLA/Project Sentinel may continue to support the claimant. Data is not available for separating out duplicative cases that might be part of both Project Sentinel/CRLA numbers and HUD/DFEH numbers. Therefore, there may be some overlap in the total number of claims reported in the data.

Since 2004, the Federal government's annual budget increased from \$20.25 million to \$40.1 million in 2014 for the Fair Housing Initiatives Program (FHIP), which is HUD's main source of fair housing-related funds. Project Sentinel, California Rural Legal Assistance and Fair Housing Council of Central California are all FHIP sub-grantees. Project Sentinel uses FHIP funding, as well as other sources, to supplement its fair housing services in Stanislaus County and City of Turlock. These three FHIP grantees will need to reapply for funds every one to three years, depending on the terms of their original grant. HUD funding for fair housing is determined on a yearly basis by Congress. Given these conditions, continued funding for these fair housing programs in Stanislaus is uncertain.

Project Sentinel – Stanislaus Urban County

From July 1, 2011, through June 2014, Project Sentinel processed 66 fair housing cases in Stanislaus Urban County¹⁷. It is important to note that outcomes for Project Sentinel will be different from HUD and DFEH because HUD and DFEH solely process claims whereas Project Sentinel may refer the claim to HUD or council the client without a claim being filed. Additionally, HUD only processes claims based on Federal-protected classes, whereas DFEH and nonprofits will advocate and process claims based on State-protected classes.

In Stanislaus Urban County, Project Sentinel processed 26 fair housing cases and 38 tenant/landlord cases in Fiscal Year 2011–2012.¹⁸ Of the 26 cases that were opened, 17 were disability related, 2 were race related, 1 was related to family status, 1 was related to gender, and 5 were related to source of income. Additionally, 45 tenant-landlord cases were successfully counseled and educated in fair housing and/or reached conciliatory agreements. In these disputes, Project Sentinel provides the tenant and the landlord with fair housing information.

¹⁷ Unless noted, all Project Sentinel data contained in this report cover Stanislaus Urban County geography.

¹⁸ Fiscal Year means the County's Fiscal Year, which is defined as July 1 through June 30 of the corresponding year. If the Fiscal Year is not mentioned before a specific year (i.e., 2013), then usually the period from January 1 through December 31 applies.

In Fiscal Year 2012–2013, Project Sentinel processed 25 fair housing cases. Of the 25 cases that were opened, 20 were disability related, 4 were income source related, and 1 was related to family status. Fifty-five tenant-landlord cases were successfully counseled and educated in fair housing and/or reached conciliatory agreements.

Throughout Fiscal Year 2013–2014, Project Sentinel processed 15 fair housing cases and 15 tenant/landlord cases. Services provided for these cases included testing, canvassing, statistical analysis, witness interviews, and counseling. Of the 15 cases that were opened, 9 were disability related, 2 were race related, 2 were related to familial status, 1 was related to gender, and 1 was related to intimidation and harassment. Six of the 15 tenant/landlord cases were successfully counseled and educated in fair housing and/or reached conciliatory agreements.

Project Sentinel – City of Turlock

From July 1, 2001 through June 2014, Project Sentinel processed 23 fair housing cases in the City of Turlock. The type of bases, in order, include: disability (12), race (4), familial status (2), source of income (2), and age (1), sexual orientation (1) and other arbitrary reasons (1).

California Rural Legal Assistance

CRLA processed 35 fair housing cases during 2012 and 2013, and an additional 35 cases in 2014, totaling 70 fair housing claims. CRLA did not have specific data available for discrimination basis or type of resolution for each claim. CRLA data covers all of Stanislaus County and was not available by City.

Table 44
Fair Housing Cases per Agency*, Approximately 2012 to 2014**

| Complaints per Agency | Number | Percentage |
|------------------------------|---------------|-------------------|
| HUD | 2 | 1% |
| DFEH | 18 | 12% |
| Project Sentinel | 66 | 42% |
| CRLA | 70 | 45% |
| Total | 156 | 100% |

**HUD, DFEH, and Project Sentinel data includes Stanislaus Urban County geography, which includes cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford and the unincorporated area of the County. CRLA data was not available by city and covers the entire Stanislaus County.*

*** HUD, DFEH, and CRLA data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

Table 44.1
Fair Housing Cases per Agency in City of Turlock, Approximately 2012 to 2014*

| Complaints per Agency | Number | Percentage |
|------------------------------|---------------|-------------------|
| HUD | 1 | 3% |
| DFEH | 8 | 25% |
| Project Sentinel | 23 | 72% |
| CRLA | unavailable | n/a |
| Total | 32 | 100% |

** HUD, DFEH and CRLA data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

Table 45
Fair Housing Cases by Basis,* Approximately 2012 to 2014**

| Basis of Complaint | Number*** | Percentage |
|--|------------------|-------------------|
| Disability | 58 | 66% |
| Race | 4 | 5% |
| Familial Status | 7 | 8% |
| National Origin | 3 | 3% |
| Sex | 3 | 3% |
| Other (religion, color) | 0 | 0% |
| CA-Specific (2 retaliation, 9 source of income, 2 pregnancy) | 13 | 15% |
| Total | 88 | 100% |

**Includes HUD, DFEH and Project Sentinel cases. CRLA cases were not included because they did not provide cases broken down by basis.*

*** HUD, DFEH, and CRLA data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

****HUD, DFEH, and Project Sentinel data includes Stanislaus Urban County geography only.*

Table 45.1
Fair Housing Cases by Basis in City of Turlock*, Approximately 2012 to 2014**

| Basis of Complaint | Number | Percentage |
|----------------------------------|---------------|-------------------|
| Disability | 14 | 42% |
| Race | 4 | 12% |
| Familial Status | 2 | 6% |
| National Origin | 4 | 12% |
| Sex | 0 | 0% |
| Religion | 4 | 12% |
| CA-Specific - Age | 1 | 3% |
| CA-Specific - Source of income | 2 | 6% |
| CA-Specific – Sexual orientation | 1 | 3% |
| CA-Specific – Arbitrary reason | 1 | 3% |
| Total | 33 | 99%*** |

**Data includes HUD, DFEH, and Project Sentinel cases. CRLA cases were not included because they did not provide cases broken down by basis nor by city.*

***HUD and DFEH data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.*

****Total is due to rounding errors.*

Table 46
Fair Housing Complaints by Resolution in Stanislaus Urban County*
for HUD and DFEH, 2012 to 2014**

| Outcome | Number | Percentage |
|---------------------|--------|------------|
| Conciliated/Settled | 5 | 24% |
| No Cause | 6 | 29% |
| Withdrawn | 1 | 5% |
| Transferred | 1 | 5% |
| Open | 5 | 24% |
| Other | 3 | 14% |
| Total | 21 | 99%*** |

*HUD and DFEH data includes Stanislaus Urban County geography only.

**HUD and DFEH data is from January 1, 2012, to December 31, 2014

***Total is due to rounding errors.

Table 46.1
Fair Housing Complaints by Resolution in Stanislaus Urban County*
for Project Sentinel, 2012 to 2014**

| Outcome | Number | Percentage |
|-------------------|--------|------------|
| Conciliated | 6 | 9% |
| Counseled | 40 | 61% |
| HUD referral | 13 | 20% |
| DFEH referral | 1 | 2% |
| Decline to pursue | 2 | 3% |
| Other | 4 | 6% |
| Total | 66 | 101%*** |

* Project Sentinel data includes Stanislaus Urban County geography only.

** Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.

***Total is due to rounding errors.

Table 46.2
Fair Housing Complaints by Resolution in City of Turlock*, 2012 to 2014**

| Outcome | Number | Percentage |
|---------------------|--------|------------|
| Conciliated/Settled | 9 | 28% |
| No cause | 1 | 3% |
| Counseled | 14 | 44% |
| HUD referral | 3 | 9% |
| Withdrawn | 4 | 13% |
| Other | 1 | 3% |
| Total | 32 | 100% |

*Data includes HUD, DFEH, and Project Sentinel cases. CRLA cases were not included because they did not provide cases broken down by resolution nor by city.

**HUD, DFEH data is from January 1, 2012, to December 31, 2014; whereas Project Sentinel data is from Fiscal Year July 1, 2011, to July 30, 2014.

Department of Justice

The U.S. Department of Justice also brings fair housing discrimination claims. Its jurisdiction includes cases involving a pattern or practice of housing discrimination. In 2013, the Department of Justice responded to more than 1,200 complaints and because most complaints were outside the Departments' jurisdiction, they opened 153 new cases for investigation. Forty-three cases were filed for patterns or practice of discrimination, which is higher than the 36 cases filed in 2012 and 41 in 2011. Of those 43 cases, five involved fair lending for home loans and 11 involved rental discrimination on the basis of race, disability, sex, familial status, national origin, or religions. In 2012,

Advocacy Organizations

Advocacy organizations like the National Fair Housing Alliance (NFHA) have been influential in decreasing fair housing law violations. Their influence can even be felt on a local level. For example, as a result of NFHA investigations, HUD and NFHA partnered to bring suit against bank-owned properties or REO (real estate owned) properties. They successfully reached a settlement with Wells Fargo. As part of the settlement, Wells Fargo will invest \$39 million in 45 communities to support homeownership, neighborhood stabilization, property rehabilitation, and housing development. Several of those cities are located in California's hardest hit foreclosure cities, including Modesto. Wells Fargo also committed to improving its maintenance and marketing practice with REO properties by extending the time that an REO is exclusively available to purchase by owner-occupants or nonprofit organizations. NFHA and HUD have filed suits with several other banks with REO properties. Future settlements could also impact Stanislaus County.

Outreach and Education

Nonprofit fair housing organizations provide a multitude of fair housing-related services in the Stanislaus Urban County. Project Sentinel, Habitat for Humanity-Stanislaus, California Rural Legal Assistance, and Community Housing and Shelter Services are local agencies that are active in educating the public and industry professionals on fair housing laws. Project Sentinel and California Rural Legal Assistance process fair housing claims, while Habitat for Humanity-Stanislaus and Community Housing refer fair housing claims to other entities.

Project Sentinel

Project Sentinel provided information and referral services to 1,104 individuals and participated in 82 fair housing events from July 1, 2011, through June 30, 2014.

During Fiscal Year 2011–2012, Project Sentinel provided 22 fair housing presentations to client groups or other agencies. These fair housing events encompass meetings and presentations where educational materials, fair housing literature, agency flyers, or business cards were distributed to the attendees or left at sites for public display.

Additionally, in Fiscal Year 2012–2013, Project Sentinel attended and participated in 36 events. Outreach activities were conducted at the Laos Central Baptist Church, Bridge Community Center, Black History Month Celebration, Stanislaus Board of Education, senior apartment complexes, Patterson School District, local property management companies, NAACP, Valley Regional Medical Center, Turlock City Hall, Turlock Main Library, Stanislaus County Public Works, Housing Authority of the County of Stanislaus (Housing Authority), Stanislaus Pride Center, and United Way of Stanislaus.

In Fiscal Year 2013–2014, Project Sentinel conducted 24 outreach activities, including outreach to the Stanislaus County District Attorney's Office, a local LGBT support group, League of United Latin American Citizens, Employment Development Department, Focus Health, Black History Month Celebration, Mo Pride Gay Pride celebration, Women's Haven, Turlock Housing Program Services, Turlock Housing Collaborative, Stanislaus County Family Justice Center, Area Agency on Aging,

Stanislaus County Superior Court Law Library, Turlock Chamber of Commerce, Stanislaus Catholic Charities, Stanislaus County Self-Help Center, Stanislaus County Social Services, and Community Impact Central Valley.

The fair housing hotline received a total of 446 tenant-landlord and fair housing calls during the period from July 1, 2011, through June 30, 2014. Tester training and recruitment was conducted throughout those years as needed. Tester training can be a valuable outreach tool to encourage education on better fair housing practices to the private sector. It is also one method of enforcement that is useful for uncovering discrimination that is difficult for potential renters and buyers to detect themselves. Testers go into the field, modeling a certain protected class, and determine whether a real estate professional, landlord, or property management company treats them unfairly.

Project Sentinel's fair housing programs served a total 1,104 individuals from July 1, 2011, to June 30, 2014. Fiscal Year 2011–2012 has been separated to show the large reduction in services in recent years.

Table 47
Project Sentinel's fair housing program, number of individuals served

| City | Fiscal Years 2012 through 2014 | Fiscal Year 2011–2012 |
|----------------------------|---|----------------------------------|
| Ceres | 148 | 108 |
| Newman | 48 | 36 |
| Oakdale | 60 | 109 |
| Patterson | 127 | 89 |
| Waterford | 20 | 11 |
| Other unincorporated areas | 183 | 165 |
| Turlock | 299 | 250 |
| Subtotal | 586 | 518 |
| County Total | 1,104 | |

Project Sentinel strives to provide education and outreach because many residents and smaller mom and pop owners are unaware of their rights and responsibilities under fair housing laws.

In addition to the above services, Project Sentinel's housing and mortgage counseling services include reviewing files for potential fair housing issues. Moreover, Project Sentinel's housing counseling training sessions including first-time homebuyer classes, which include a component in fair housing laws.

California Rural Legal Assistance

CRLA began providing biweekly workshops on landlord-tenant disputes in Stanislaus County in July of 2014. To date, approximately, 240 residents have participated in this event and received information on fair housing laws.

Habitat for Humanity

Habitat for Humanity-Stanislaus provides monthly homebuyer education classes in Modesto. The course includes a component on fair housing. The organization refers fair housing claims to Project Sentinel.

Community Housing and Shelter Services

Community Housing and Shelter Services (CHSS) has several programs in which participants receive referral information on what agencies to contact if they have a fair housing issues. The number of people given this referral information is not tracked across all programs; however, CHSS was able to provide that data on two of their programs. For its Emergency Food and Shelter Program, CHSS provided 497 participants over a one year (10/2013-9/2014) period with this fair housing resource. Secondly, thirty-four participants received this resource under their fair housing counseling program. This is over the course of a typical month (3/2014) in their program. CHSS refers all fair housing questions and claims to Project Sentinel or California Rural Legal Assistance. This organization receives multiple calls and some relate to fair housing issues. They typically refer these persons to Project Sentinel; however, the number of these referrals is not tracked.

Fair Housing Council of Central California

Fair Housing Council of Central California is a FHIP grant recipient from HUD. They provide advocacy and outreach on fair housing issues. Their website provides tenants and homebuyers examples of what might be discrimination. They also produce a monthly radio program called Fair Housing – It's the Law! On KFCF 88.1 Free Speech Radio. The program hosts fair housing experts from the Central Valley.

Summary of Complaints and Enforcement Activity

Multiple entities are involved with providing assistance to citizens who face housing discrimination. While HUD and DFEH mainly process claims, nonprofits offer a variety of services to assist citizens and the private sector; including: advocating for those who experience unfair treatment; conducting outreach to both citizens and landlords; and providing valuable information and resources to citizens and landlords about their rights and responsibilities. Discrimination that occurs in home ownership activities such as mortgage lending is more difficult to detect and therefore enforce. Nonprofits that operate discrimination tests are helpful in identifying when it occurs. Additionally, when acting collaboratively with HUD, the nonprofit can help bring about claims that help improve the practices of the private sector. Additionally, outreach and education could be used to prevent discrimination in homeownership activities. Disability related discrimination remains the most common type of basis in Stanislaus Urban County and City of Turlock. By using the various entities, these communities can help reduce disability discrimination through both enforcement and outreach and education.

Government Barriers to Fair Housing

Housing Element Law and Compliance

The California Legislature has adopted requirements for the contents of housing elements. Among these legislative requirements is the following mandate: “The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.”

Specifically, the element must contain:

- ◆ An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs, including:
 - ◆ Analysis of population and employment trends.
 - ◆ Analysis and documentation of household/housing characteristics.
 - ◆ Inventory of land suitable for residential development.
 - ◆ Identification of a zone or zones where emergency shelters are allowed.
 - ◆ Analysis of potential and actual government constraints.
 - ◆ Analysis of potential and actual non-governmental constraints.
 - ◆ Analysis of special housing needs (including persons with disabilities, including a developmental disability).
 - ◆ Analysis of opportunities for energy conservation.
 - ◆ Analysis of existing housing developments that are eligible to change from low-income housing during the next 10 years.
- ◆ A statement of the community’s goals, quantified objectives, and policies relative to the maintenance, improvement, and development of housing. The total housing needs identified may exceed the available resources and the community’s ability to satisfy those needs.
- ◆ A program that sets forth a schedule of actions the local government is undertaking or intends to undertake during the planning period, including:
 - ◆ Identifying adequate sites that will be made available with appropriate zoning and development standards.
 - ◆ Assisting in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
 - ◆ Addressing, and where possible, removing governmental constraints.

- ◆ Conserving and improving the condition of the existing affordable housing stock.
- ◆ Promoting housing opportunities for all persons (fair housing program).
- ◆ Preserving for lower-income households the assisted housing developments.
- ◆ Including an identification of the agencies and officials responsible for implementation of the various actions.
- ◆ Including a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element.

Procedural Requirements

Stanislaus County and cities in the County must consider guidelines adopted by the California Department of Housing and Community Development (HCD) when undertaking revisions to the Housing Element. Stanislaus County and cities in the County must submit drafts of their Housing Elements to HCD for review prior to formal adoption. They then must amend the draft Housing Element taking into consideration HCD's findings or make findings as to why the jurisdiction believes it is in substantial compliance with the law.

Housing for Persons with Special Needs

Housing for Persons with Disabilities

Stanislaus County

Compliance with provisions of the Federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building Official in Stanislaus County and by the Building Departments in cities in the County. ADA access is enforced through the building permit entitlement process by the Building Permits Division of the Planning and Community Development Department and by the Building Departments in cities in the County.

Stanislaus County offices and cities in the County offices are accessible to those with disabilities. Disabled applicants are treated with the same courtesy as all applicants. Disabled applicants are provided one-on-one assistance to complete the forms for zoning, permits, or other building applications. Stanislaus County and cities in the County will accommodate any specific verbal or written request for assistance. Applications for retrofit are processed over the counter in the same process as for improvements to any single-family home.

In response to Senate Bill (SB) 520 and to ensure a fair and efficient process for persons with disabilities to make necessary accessibility adjustments to their homes, Stanislaus County will amend the Zoning Ordinance to create a reasonable accommodation procedure. In addition, as part of the Home Rehabilitation Loan program, Stanislaus County provides rehabilitation grants to disabled persons to improve access and mobility in their homes.

City of Turlock

Zoning and Reasonable Accommodations Procedure

Compliance with SB 520 is met by permitting supportive multi-family or single-family housing for the disabled in any residential zone that permits non-designated single- or multi-family housing. One assisted housing development, Denair Manor, houses the elderly as well as disabled adults of any age. In addition, as part of the Home Rehabilitation Loan program, the City of Turlock provides rehabilitation grants to disabled persons to improve access and mobility in their homes.

The City of Turlock offices are accessible to those with disabilities. Disabled applicants are treated with the same courtesy as all applicants. Disabled applicants are provided one-on-one assistance to complete the forms for zoning, permits, or other building applications. The City of Turlock will accommodate any specific verbal or written request for assistance. Applications for retrofit are processed over the counter in the same process as for improvements to any single-family home.

The City of Turlock continually reviews its ordinances, policies, and practices for compliance with fair housing laws. The City of Turlock has a broadened and revised definition of “family” to include State and Federal definitions relating to unrelated adults living together as a household unit.

Parking Requirements

All multi-family complexes are required to provide handicapped parking at a rate of one space for every 20 non-handicapped spaces. One parking space is provided for each dwelling unit designed for people with disabilities. Stanislaus County and cities in the County and the City of Turlock work with the developers of special needs housing and will reduce parking requirements if the applicant can demonstrate a reduced need for parking.

Licensed Community Care Facilities

Stanislaus County

A residential care facility or group home is a facility that provides 24-hour nonmedical care for more than six persons 18 years of age or older, or emancipated minors, with chronic, life-threatening illness in need of personal services, protection, supervision, assistance, guidance, or training essential for sustaining the activities of daily living or for the protection of the individual. This classification includes group homes, residential care facilities for the elderly, adult residential facilities, wards of the juvenile court, and other facilities licensed by the State of California. In Stanislaus County, residential care homes are permitted in the R-3 (Multiple-Family Residential) and C-1 (Neighborhood Commercial) zones with public services (water and sewer). The R-A (Rural Residential) zone allows residential care homes with a Use Permit. Program 2-10 in the Stanislaus County Draft Housing Element 2015-2023 is proposed to amend the County Zoning Ordinance to specify that group homes/residential care facilities are allowed by right in residential zones consistent with State law for small group homes and with a Use Permit for large facilities.

City of Turlock

The City of Turlock permits group homes with six or fewer persons in any residential zone, as well as in the agricultural and commercial office districts, without restriction or additional permits. This allows proponents to locate these facilities in any area they can afford without additional development or permit costs. The development of group homes is therefore a market issue, not a regulatory issue.

State-licensed group homes are permitted by right in residential districts, in the agricultural district with a Conditional Use Permit, and in the commercial office district with a staff-level Minor Discretionary Permit. There are no regulations relating to the siting of special needs housing in relationship to distance or location to one another.

The City of Turlock holds public hearings for every change or amendment to any ordinance, policy, program, procedure, funding, or other similar action. There is no public comment requirement for the establishment of a State-licensed group home, regardless of size. The Zoning Ordinance states (in part) that State-licensed group homes, foster homes, residential care facilities, and similar State-licensed facilities, regardless of the number of occupants, are deemed permitted by right in a residential zoning district, pursuant to State and Federal law. There are no special conditions for group homes that also provide services, such as counseling, if there will be six persons or fewer in residence, or if the larger

facility is located in a commercial zone or civic center. However, if the larger facility is planned in a residential zone, the service component will require a Use Permit.

Reasonable Accommodation

Stanislaus County

Reasonable accommodation is a procedure that can be codified or implemented at the policy level in response to requests for exceptions to zoning and land-use regulations and procedures which are necessary to make housing available to an individual with a disability protected under fair housing laws. These exceptions can include but are not limited to permit applications and access to affordable housing programs. Program 5-7 in the County Housing Element requires Stanislaus County to amend the Zoning Ordinance to create a reasonable accommodation procedure. This State requirement is also in response to SB 520.

City of Turlock

The Housing Element includes a policy that recognizes the City's efforts to comply with Federal law that requires reasonable accommodation of requests to improve physical access to structures for disabled persons, even if these requests (for example, a covered wheelchair ramp extending into a setback alongside a single-family house) violate the City's Zoning Ordinance. The July 12, 2011, amendment to the Turlock Municipal Code (TMC) revised Section 9-3-103 to allow deviations from the setback and height requirements for the purpose of providing accommodation for disabled access to an existing structure upon approval of a Minor Administrative Approval pursuant to Article 3 of TMC Chapter 9-5.

Housing for the Homeless

Transitional and Supportive Housing

Stanislaus County

Transitional housing is defined in California Government Code Section 65582(h) as buildings configured as rental housing developments but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.

Transitional housing is defined by HUD in 24 C.F.R. 91.5 [Title 24 Housing and Urban Development; Subtitle A Office of the Secretary, Department of Housing and Urban Development; Part 91 Consolidated Submissions for Community Planning and Development Programs; Subpart A General] as "a project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period approved by HUD. For purposes of the HOME program, there is no HUD-approved time period for moving to independent living."

Supportive housing is defined by California Government Code Section 56682(f) as housing with no limit on length of stay, that is occupied by the target population, and that is linked to an on- or off-site service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population is defined in Health and Safety Code Section 56682(g) as persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

Permanent Supportive Housing is defined by HUD per title IV of the Stewart B. McKinney Homeless Assistance Act (the McKinney Act) (42 U.S.C. 11381–11389) as “long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or coordinated by the applicant and provided by other public or private service agencies. Permanent housing can be provided in one structure or several structures at one site or in multiple structures at scattered sites. There is no definite length of stay.”

Under the current Stanislaus County Zoning Ordinance, transitional and supportive housing is not specifically identified but by practice has been considered under the definition of a residential care facility. Program 4-8 in the draft County Housing Element is proposed to amend the Zoning Ordinance within one year of adoption of the Housing Element to identify these uses separately as well as where they are permitted. By law, transitional and supportive housing must be treated as a residential use in all residential zones and only subject to those restrictions that apply to other residential uses of the same type in the same zone.

City of Turlock

The City of Turlock recognizes the need to address constraints to the establishment of supportive and transitional housing in the city. Housing Element Policy 1-3-2 contains four programs that will address the current constraints and bring the City of Turlock into compliance with the requirements of SB 2 (Cedillo). Program D addresses the need to provide supportive and transitional housing, which are critical components of ending individuals’ cycle of homelessness.

Existing transitional and supportive housing serving Stanislaus Urban County and City of Turlock include Behavioral Health and Recovery Services (BHRS), Salvation Army of Stanislaus County, Assistance and CICV’s Life Development Opportunity Program (HALO), Housing Authority of the County of Stanislaus (Housing Authority), The Modesto Men’s Gospel Mission and Women’s Mission, STANCO, Turning Point, Center for Human Services (CHS), We Care, and Family Promise.

Emergency Shelter

Stanislaus County

In effect since January 1, 2008, SB 2 (Cedillo, 2007) requires Stanislaus County to allow emergency shelters without any discretionary action in at least one zone that is appropriate for permanent emergency shelters (i.e., with commercial uses compatible with residential or light industrial zones in transition), regardless of demonstrated need. The goal of SB 2 was to ensure that local governments are sharing the responsibility of providing opportunities for the development of emergency shelters.

Emergency shelters are defined by HUD as “any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless.”

Under the current Stanislaus County Zoning Ordinance, emergency shelters are not specifically identified but by practice have been considered under the definition of a residential care facility. Program 4-7 in the draft County Housing Element is proposed to amend the Zoning Ordinance within one year of Housing Element adoption to identify this use separately as well as where it is permitted. To that end, the legislation also requires that Stanislaus County demonstrate site capacity in the zone or zones (i.e., M (Industrial), H-1 (Highway Frontage), and/or C-2 (General Commercial)) identified to be appropriate for the development of emergency shelters. In the identified zone, only objective development and management standards may be applied, given they are designed to encourage and facilitate the development of or conversion to an emergency shelter.

Existing lots totaling over 3,300 acres with M (Industrial) zoning are sufficient in size (from 1 acre to several acres) with available infrastructure to support an emergency shelter in areas of Stanislaus County such as South Turlock, the Beard Industrial District south of Yosemite Avenue, and South Modesto. For lots of 3.5 acres or less in these areas, for example, South Turlock has 31 parcels, the Beard Industrial District has 230 parcels, and South Modesto has 56 parcels, at least 50% of which could accommodate an emergency shelter as a stand-alone use or in conjunction with an existing use. In addition, due to the recent economic downturn, numerous parcels larger than 3.5 acres with existing vacant industrial facilities in these same areas, with some modification, could be converted to an emergency shelter, similar to the existing Salvation Army shelter in South Modesto.

All of these areas are also on or near transportation routes and in proximity to cities where a variety of services are available. The M district allows uses such as wholesale and distribution establishments, service establishments, and public and quasi-public buildings, as well as uses in commercial zones such as churches, schools, day care centers, family day care homes, hospitals, community centers, and a variety of retail uses. Development standards permit buildings up to 75 feet in height with front yard setbacks of 15 feet.

City of Turlock

Three of the programs in Housing Element Policy 1-3-2 address the current constraints and bring the City of Turlock into compliance with the requirements of SB 2 related to emergency shelters. Program A implements the City of Turlock's recent amendment to its Zoning Ordinance to allow emergency shelters by right per SB 2 requirements. The City of Turlock initiated the amendment by seeking community input on a general SB 2 Study Area within which a specific location for an overlay zone for emergency shelters would be identified. Community members who participated in the SB 2 workshops identified access to services for the homeless, access to bus service, the ability to walk to services and commercial businesses, and the availability of land as the primary factors for selecting an area. The Planning Commission directed staff to engage nonprofit and business organizations that either serve the homeless community or have been involved in planning for homeless facilities to help develop a draft set of development standards, permissible under SB 2, for consideration. The SB 2 Technical Advisory Committee was formed consisting of representatives from City of Turlock staff and representatives of the Turlock Downtown Property Owners Association, the Turlock Gospel Mission, the We Care program, and the Disability Resource Agency for Independent Living (DRAIL). On February 8, 2011, the City Council and the Planning Commission held a joint meeting to review the draft standards and to provide more specific direction to staff on the boundaries for the proposed zoning overlay district and set the cap on the number of beds to be provided at 200.

Senate Bill 2 requires the City of Turlock to demonstrate that sufficient capacity exists within the SB 2 zoning boundary to meet the homeless sheltering needs in the City of Turlock. Staff conducted a windshield survey and collected real estate listings to prepare an initial list of available properties. The criteria for inclusion on this list included sites that are currently undeveloped (no buildings), sites with large portions of undeveloped land (underdeveloped properties), and sites that are listed for sale or lease. In addition, property owners contacted staff to add their properties to the list. With the potential size limitations for each district in mind, and based on the available land in each zoning district within the overlay area, staff calculated that approximately 1,200 beds could be developed within the proposed zoning district boundary. Based on this survey, the City Council determined that sufficient vacant land and/or for-sale/lease property may be available in the zoning overlay area to accommodate up to 200 beds to meet the City Council's initial goal.

A new section of Chapter 4 of Title 9 of the Turlock Municipal Code (Zoning Overlay Regulations) was adopted on July 12, 2011, establishing the boundary of the zoning district and the permitting process. The ordinance is summarized in Policy 1-3-2. The ordinance requires annual review of the district-wide cap on the number of beds. This will allow homeless service providers to provide input to the City Council on whether the cap constrains the ability of the City of Turlock to respond to its homeless sheltering needs.

Other programs under Policy 1-3-2 address compliance with other aspects of SB 2. Program B aims to support local nonprofit agencies in establishing a year-round emergency shelter. Program C also provides financial assistance to these agencies for establishing additional short-term beds for all segments of the homeless population, including the mentally ill and the chronically disabled.

Existing emergency shelters serving Stanislaus Urban County and City of Turlock include Hutton House, Helping Others Sleep Tonight (HOST), Modesto Men's Gospel Mission and Women's Mission, Mission Emergency Shelter, Salvation Army of Stanislaus County, Turlock Gospel Mission, Turning Point, and We Care.

Building Code

Stanislaus County

Stanislaus County has adopted and enforces the 2013 California Building Code. The only substantive changes were required by Measure X, a local initiative approved by Stanislaus County voters in 1990, which requires that any urban development in the unincorporated areas of the County occur in conjunction with primary and secondary sewage treatment if the lot was recorded after July 13, 1990 and is less than 10 acres in size. Farm worker housing, very low-income housing, and single-family uses on lots recorded prior to July 13, 1990, are permitted to utilize traditional septic tank and leach field systems. Although the changes were found to be more restrictive than those in the California Building Code, a finding was made that the changes were necessary due to local climatic, geological, or topographical conditions throughout Stanislaus County. These changes are intended to protect the health and well-being of residents in unincorporated areas of the County.

Health and Safety Code Section 17980(b)(2) requires local governments to give consideration to the needs for housing as expressed in the housing element when deciding whether to require vacation of a substandard building or to repair as necessary. The enforcement agency is required to give preference to the repair of the building whenever it is economically feasible to do so without having to repair more than 75 percent of the dwelling. Stanislaus County as a general rule will only recommend the vacation and/or demolition of a building when more than 75 percent of the building requires repair. In general, enforcement related to substandard buildings by the Building Division occurs either in response to the receipt of a citizen complaint or when discovered by Building Inspectors when making daily inspections.

The Building Division of the Community Development Department is aware of the various housing rehabilitation programs that are offered to homeowners. Inspectors will typically inform a property owner of Stanislaus County's programs in order to facilitate the rehabilitation and conservation of housing units in need of repair.

City of Turlock

At the time of its last Housing Element update, the City of Turlock had adopted the 2007 Uniform Building Code (UBC), Uniform Housing Code, and Uniform Code for the Abatement of Dangerous Buildings. New structures must conform to the standards of the UBC. When a project is plan checked, it is reviewed for minimum compliance with the 2007 California Building Code (CBC). This includes electrical, plumbing, mechanical (heating and cooling), structural, energy compliance, nonstructural (building exits, interior environment, etc.), and disabled access (commercial buildings). The Uniform Housing Code is not applicable to structural modifications or additions.

The Uniform Code for the Abatement of Dangerous Buildings applies to all buildings, old or new. These building codes ensure structural integrity and facilitate the City of Turlock's efforts to maintain a safe housing supply.

Resources and Incentives for Affordable Housing

Inclusionary Housing

Stanislaus County

Stanislaus County does not have an inclusionary housing ordinance in place.

City of Turlock

The City of Turlock does not have an inclusionary housing ordinance in place.

City of Ceres

The City of Ceres does not have an inclusionary housing ordinance in place.

City of Hughson

The City of Hughson does not have an inclusionary housing ordinance in place.

City of Newman

The City of Newman does not have an inclusionary housing ordinance in place.

City of Oakdale

The City of Oakdale does not have an inclusionary housing ordinance in place.

City of Patterson

Chapter 18.86 of the City of Patterson Zoning Ordinance is the Inclusionary Housing ordinance.

City of Waterford

The City of Waterford does not have an inclusionary housing ordinance in place.

Density Bonus

Stanislaus County

Chapter 21.08.080 of the County Zoning Ordinance addresses density bonuses.

City of Turlock

The City of Turlock provides cost reductions to developers through its adopted Density Bonus Ordinance when low- and very low-income housing units are proposed. Housing Element Policy 2-1-4 reflects the City of Turlock's updated density bonus ordinance, specifying that the City of Turlock will follow the criteria set forth in California Government Code Section 65915 regarding density bonus requests for affordable housing, in compliance with SB 1818. Since adoption of the City of Turlock's last Housing Element, additional changes have been made to State density bonus law. The City of Turlock expects to include a program in its 2015–2023 Housing Element to update the density bonus ordinance.

City of Ceres

Chapter 18.90 of the City of Ceres Zoning Ordinance addresses density bonuses.

City of Hughson

Section 17.03.016 of the City of Hughson Municipal Code addresses density bonuses and was updated in 2008.

City of Newman

Chapter 5.14 of the City of Newman Municipal Code codifies the City's Density Bonus Overlay district (DBO).

City of Oakdale

Chapter 36-18.20 of the City of Oakdale Zoning Ordinance addresses density bonuses.

City of Patterson

Chapter 18.88 of the City of Patterson Zoning Ordinance addresses density bonuses.

City of Waterford

Chapter 17.34 of the City of Waterford Municipal Code codifies the City's Density Bonus Overlay district (DBO).

Identification of Impediments and Actions to Address

The purpose of this analysis is to determine the possible existence of impediments to housing choices based on age, race, religion, sex (including pregnancy, childbirth, and related medical conditions), sexual orientation and identity, color, national origin, disability (physical or mental), ancestry, or marital status and where identified, to suggest necessary steps to reduce and/or eliminate such impediments. This section describes those impediments and the corresponding actions identified through the analysis.

To facilitate reporting of accomplishments and the association of planned activities with impediments and actions to address, each impediment and action is identified by a number. Actions are labeled according to the impediment they address. It is important to note that the identification of an impediment does not necessarily identify a deficiency. By identifying the presence of an impediment, this analysis is stating the nature of a problem which the actions to address will serve to mitigate. These may be affirmative actions as much as responses to current conditions.

Please note that State law requires local jurisdictions in California to assess barriers to affordable housing as part of the General Plan's Housing Element. Programs to address impediments to fair housing may be addressed through the implementation of the Housing Element.

Affordable Housing

- 1. Impediment: Insufficient supply of affordable housing.**
 - 1.1 Action:** Continue to provide assistance to preserve existing affordable housing and to create new affordable housing.
 - 1.2 Action:** Continue to offer regulatory relief and incentives for the development of affordable housing.
 - 1.3 Action:** Continue to ensure the availability of adequate sites for the development of affordable housing.
- 2. Impediment: Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.**
 - 2.1. Action:** Continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of lower-income households.
 - 2.2. Action:** Continue to support the Stanislaus Housing Authority Section 8 Housing Choice Voucher (HCV) Rental Assistance Program, including distribution of program information at the public counters for the Stanislaus County Department of Planning and Community Development, City of Turlock Housing Services, and all Stanislaus Urban County member jurisdictions. Stanislaus County and the City of Turlock will hold periodic meetings with representatives of the Housing Authority of the County of Stanislaus to discuss actions Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions can take to coordinate housing program implementation.
 - 2.3 Action:** Follow through on the Housing Element policies and programs.

Discussion:

To understand the demand and supply of affordable housing in Stanislaus Urban County and City of Turlock, several factors can be considered, including income, poverty, household size, household characteristics (such as elderly and disabled) and housing characteristics. These factors reveal the affordable housing needs of the residents in the community, both in the number and type of housing needed to adequately house its population.

Income

Income levels within Stanislaus Urban County and City of Turlock demonstrate that a significant portion of the population is lower income. This means the Stanislaus Urban County and City of Turlock face a high demand for housing units that are priced at affordable rates.

Area median family income (AMI) categories are set by household size (2, 3, etc. persons in a household). For each household size, the income levels are determined according to increasing levels of income. The order, beginning with the lowest income, is extremely low-income (30 percent of the area median income), very low-income (50 percent of the area median income), low-income (50 percent of the area median income) and moderate income (120 percent of the area median income). The following AMI data¹⁹ was used to analyze City of Turlock and Stanislaus Urban County: for a household of two, \$15,930 to \$54,720 is the range from extremely low-income to moderate income; for a household of three, \$20,090 to \$61,560; for a household of four, \$24,250 to \$68,280. The average household size²⁰ in the City of Turlock and for the six members Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford is approximately 3 persons per household.

Given the average household size is 3, the following is an analysis of the number²¹ of people living in extreme, very low-, low- and moderate incomes in those communities. The median household incomes²² (MHI), which represents the half-way point²³ not average of all incomes, for the City of Turlock, for all six members Ceres, Hughson, Newman, Oakdale, Patterson and Waterford, and for fifteen out of the twenty-one unincorporated areas of Stanislaus County fall under the moderate income level category of \$61,560, which means the majority of residents do not exceed beyond a moderate-income level. More specifically, when comparing the City of Turlock's MHI of \$50,862 to the City of Turlock's AMI for 3 person household (the City of Turlock's average household size is 2.96 persons) at \$41,950 for low-income and \$61,560 for moderate income levels, then it can be reasonable deduced that half of the residents are living below the moderate-income level. Additionally, more than half of the communities in the unincorporated areas have a median household income²⁴ that falls at or below the low-income level, and a handful fall under the very-low income level. Given that approximately half the population²⁵ of Stanislaus Urban County resides in these unincorporated areas, then this low-income group represents a significant portion of the Stanislaus Urban County residents.

Data mentioned above can also be found in the Background Section in **Tables 1, 6, 7, 8, 9, and 15.**

Poverty

¹⁹ FY 2015, HUD, Income Limits Summary, for Modesto, CA, Metropolitan Statistical Area (MSA)

²⁰ U.S. Census 2010

²¹ A precise amount is not calculable given that the data does not include what percentage of the total population is 2-person, 3-person, 4-person, etc. household.

²² ACS 2007-2011, 5-year estimates

²³ Median in median household incomes means that exactly half of household incomes fall below that point and half fall above; it is not an average.

²⁴ ACS 2007-2011, 5-year estimates

²⁵ Stanislaus Council of Governments, RTP 2010

Stanislaus Urban County and City of Turlock rank high amongst other county, state, and national rates in the area of poverty. The 2008-2012 American Community Survey, 5-year estimates reveals that Stanislaus Urban County and City of Turlock have poverty rates of 20.3 percent and 17.2 percent respectively are higher than the national average, 15 percent, and the State average, 15 percent. When comparing these same poverty rates to the other 58 California counties, both Stanislaus County and City of Turlock fall among the highest rated, 11th out of 58 and 24th out of 58. See Income and Poverty subsections of the Background Section, including incorporated tables.

Household characteristics

Children and elderly individuals are particularly sensitive to the amount and type of affordable housing available. Children need safe and stable homes and neighborhoods to live while growing up. This is key to their emotional well-being, ability to excel at school which also impacts their future earning ability²⁶. Elderly persons often have lower, fixed incomes. In other words, their earning potential cannot easily be increased, whereas a younger person can increase their income for housing by working more jobs, learning a new, more marketable skill, or by trying to get a higher paying job. Additionally, elderly persons may have limited physical capacities (i.e. health issues) that limit their ability to maintain or improve their housing conditions.

The average household size in the United States is 2.6 people per household and 2.9 in California²⁷; whereas, the City of Turlock and Stanislaus Urban County have an average of over three per household²⁸. Additionally, in California and nationally the percent of households with children, 37 percent and 33 percent respectively, is lower than the percent of households with children in the six communities of Stanislaus Urban County: Ceres - 49 percent, Hughson - 43 percent, Newman - 46 percent, Oakdale - 37 percent, Patterson - 49 percent, and Waterford - 47 percent. The City of Turlock has the same rate as California at 37 percent, but is higher than the national average. These communities on average have larger households with more children. Thus, these communities have a demand to provide adequate housing to house larger households and more children.

Approximately 19 percent of Stanislaus Urban County households and 21 percent of City of Turlock households are senior households. Of those senior households, an average of 80 percent in Stanislaus Urban County rent, while only 20 percent own. Whether there are a sufficient number of affordable rental units for seniors can be discerned from looking at the public housing wait-lists, vacancy rates, condition of housing, and number of disabled. Many elderly have disabilities. For example, in California, approximately 37 percent of the people aged 65 and over reported having a disability²⁹. This elderly population will need to find adequate and affordable housing in order to stay in these communities.

Ten and twelve percent of the California and United States population reported having a disability³⁰. This is a similar rate for City of Turlock and Stanislaus Urban County. (See **Table 18**, Background Section)

Data mentioned above can also be found in the Background Section in **Tables 15, 16, 17 and 18**.

Household Characteristics

While the City of Turlock and Stanislaus County have experienced a decrease in single-family home prices, this has not made homes more affordable to low-income due to instability in the job market (resulting in lack of steady income), stagnating real wages, and the general tightening of credit for new

²⁶ *Opening Doors to Rural Homeownership: Opportunities to Expand Homeownership, Build Wealth, and Strengthen Communities*, National Rural Housing Coalition (2012)

²⁷ ACS, 2008-2012 5-year estimates

²⁸ US Census 2010

²⁹ ACS, 2008-2012 5-year estimates

³⁰ Id.

home loans. The rental market is tightening as the vacancy rates remain low and rents are trending upward. However, HUD indicates that a vacancy rate of five percent is sufficient to provide choice and mobility in housing. Stanislaus Urban County has vacancy rates ranging from 6.4 to 11.0 percent, which shows that Stanislaus County has sufficient number of housing units available to meet the demand³¹. It should be noted; however, that the vacancy rate is calculated based on all types of vacant units, including seasonal, recreational, and occasional use. These types of units are intended for use only in certain seasons, weekends or other occasional use during the year, such as a housing reserved for seasonal workers or a vacation rental³². Also, without knowing the vacancy rate for specific types of housing, such as studio, 1-bedroom, 2-bedroom, 3-bedroom and more, it is unclear whether available housing units meet the housing demand for larger size families and families with children.

However, data on overcrowding can shed light on whether units are adequately sized for Stanislaus Urban County and City of Turlock families. Homeowner families in Stanislaus Urban County and City of Turlock experience a low percentage of overcrowding, 2.1 percent and 1.1 percent respectively. A low percentage also experiences severe overcrowding. HUD determines that households with more than 1 person per room are considered overcrowded and households with more than 1.5 persons per room are considered severely overcrowded. Renters and Stanislaus Urban County and City of Turlock have a different experience than the homeowners. Approximately, 3.4 percent of residents in Stanislaus Urban County experience overcrowding, and 2.8 percent of the City of Turlock residents. Similarly, 1.4 percent of Stanislaus County residents experience severe overcrowding and 1.3 percent for City of Turlock residents. Communities with the largest overcrowding and severe overcrowding of renters are Ceres, Patterson, and unincorporated areas³³. While most families are finding adequate sized housing, both to purchase and rent, the City of Turlock and Stanislaus County will take steps to see that housing of the appropriate size is available.

The number of housing units has declined overall in the Stanislaus Urban County. The City of Turlock; however, has experienced an increase of 0.4 percent³⁴. This decline and increase may be a reflection of demand for units.

Residents in both Stanislaus Urban County and City of Turlock face significant hurdles in finding housing that is within their budget. According to HUD, households that pay 30 percent or less of their gross income in housing costs have an adequate income left over to cover other living expenses. High, cost-burdened households (renters or homeowners) are those that pay between 30 and 50 percent of their gross income for housing, including rent, utilities, mortgages, insurance, taxes and/or condominium fees³⁵. Households that pay more than 50 percent of gross income are considered to have a severe, cost-burden. A high percentage of renters, 34 to 50 percent, within the six member communities of Stanislaus Urban County experience a high cost-burden³⁶. This averages to about 45 percent of residents being high cost-burdened, which is higher than the national average of 37 percent³⁷. Forty-nine percent³⁸ of City of Turlock renters are high, cost-burdened, which is also higher than the national average. California's state average is 48 percent, which is where these communities fall; however, California ranks high compared to other states³⁹. A significant percentage of renters in Stanislaus Urban County also experience severe, cost-burden in their housing, from 23 to 34 percent⁴⁰. This averages to 28 percent which is significantly

³¹ California Department of Finance Census 2010 (HCD data packet)

³² 2010 Census of Population and Housing

³³ Data from this paragraph is from 2008-2012 ACS

³⁴ California Department of Finance, 2000 and 2014 (HCD data packet)

³⁵ 2008-2012 ACS, 5-year estimate

³⁶ 2011 CHAS data, HUD State of the Cities Data System

³⁷ ACS 2008-2012, 5-year estimates

³⁸ 2011 CHAS data, HUD State of the Cities Data System

³⁹ ACS 2008-2012, 5-year estimates

⁴⁰ 2011 CHAS data, HUD State of the Cities Data System

higher than both the state and national averages of 23 and 17 percent⁴¹. Similarly, 28 percent of the City of Turlock residents experience severe, cost-burden in housing⁴².

Low-income households within the City of Turlock and six members of Stanislaus County experience a higher rate of housing cost-burden than the non low-income households. This is true for both homeowners and renters. For example, 60 percent of low-income home owners in Ceres experience high cost-burden and 30 percent of low-income residents in Ceres experience severe high cost-burden. The rate for all renters in Ceres, regardless of income is 17 percent⁴³. Similarly, 92 percent of very low-income renters in Ceres experience high cost-burden and 58 percent experience severe cost-burden⁴⁴. The amount of high and severe cost-burdened households increased with the decrease in income. For example, in Hughson, 100 percent of extremely low-income people experience high and severe cost-burden in their housing expenses. Similarly, in the City of Turlock, 86 percent of extremely low-income people experience high cost-burden and 78 percent experience severe cost-burden⁴⁵. This data demonstrates a need for housing at a lower cost to City of Turlock and Stanislaus Urban County residents that are low, very low, and extremely low income. An increase in housing subsidy programs would benefit these populations.

Data mentioned above can also be found in the Background Section, Housing Characteristics, Housing Growth, Housing Costs, Housing Affordability, and Overcrowding subsections.

The analysis above demonstrates the overall demand of affordable housing within the City of Turlock and Stanislaus County. With more than half of resident earning at or below the moderate-income level, with larger families needing larger units, with many residents experiencing a high, cost-burden, and with the high number of renting senior households, the City of Turlock and Stanislaus County will take steps to ensure the housing units are adequate in number, affordable and suitable in size/characteristics for housing its residents.

Private Practices and Mortgage Lending

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

3.1. Action: When selecting lending institutions for contracts and participation in local programs, Stanislaus County, the City of Turlock, and Stanislaus Urban County member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, the Stanislaus Urban County and the City of Turlock may review an individual institution’s most recent HMDA reporting as most recently published by the FFIEC.

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

4. Impediment: Limited coordination with real estate industry.

⁴¹ ACS 2008-2012, 5-year estimates

⁴² 2011 CHAS data, HUD State of the Cities Data System

⁴³ 2011 CHAS data, HUD State of the Cities Data System

⁴⁴ 2011 CHAS data, HUD State of the Cities Data System

⁴⁵ 2011 CHAS data, HUD State of the Cities Data System

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

4.2 Action: Encourage Realtors to seek fair housing training.

Discussion:

Education and outreach to home buyers and real estate professionals is key to preventing fair housing violations. Discriminatory practices in real estate transactions (buying a home) are more difficult to detect than in rental transactions because the buyer is often unaware that they are being steered away from certain property or treated differently than other buyers. Further, the buyer is not easily able to compare the professionals conduct compared with other buyers. While the real estate profession provides fair housing training to its licensees members, more could be done to provide additional education because of the concentration of poverty and minority groups within the Stanislaus Urban County and City of Turlock (see Background section, Areas of Minority Concentration subsection). Currently, no other local public agencies or private nonprofits provide training to real estate professionals within Stanislaus County. Opportunities are available for collaborating with The California Bureau of Real Estate and local real estate chapters to advertise and provide more training. Lastly, programs that conduct testing have been effective at finding and educating professionals in the property management field; perhaps, this method could be used more in the home buying industry.

Property management companies are not required to obtain a professional license as real estate professionals are required. Property management companies and “mom and pop” owners can voluntarily join an association. When they do, they can choose to attend any training, including fair housing. Additionally, if they decide to obtain a professional certification by the association then they will complete a fair housing training as part of the whole program. The majority of cases arise from property management companies or “mom and pop” owners that have not received fair housing training. Nonprofits and local agencies could assist in promoting members and attending fair housing training. Programs that conduct testing have been successful and should continue.

Denial and failure rates for applications by racial and ethnic minorities are higher than the average across all ethnic groups. Additional training and education could be done to address this. It is difficult to determine to what extent a person’s home loan application is being influenced by their race, ethnicity or income characteristics. Testing programs which have been successful in the rental field could be utilized here. Desegregating the areas of minority concentration groups will take coordination and policy changes across the financial and mortgage industry. The City of Turlock and Stanislaus County can work collaboratively with these industry professionals to set goal and monitor progress on those goals.

Fair Housing Education and Enforcement

5. Impediment: Limited knowledge of fair housing rights.

5.1 Action: Conduct more outreach to educate tenants, and owners and agents of rental properties, regarding their fair housing rights and responsibilities.

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

6. Impediment: Discrimination in rental housing.

6.1 Action: Support efforts to enforce fair housing rights and provide redress to persons who have been discriminated against.

- 6.2 Action:** Support efforts to increase the awareness of discrimination against all Federal and State protected classes.

Discussion:

Education and outreach efforts could be increased in the City of Turlock and Stanislaus Urban County to help promote fair and equitable housing choices for residents. Representatives from both Project Sentinel, who run fair housing programs for both entity, and the California Apartment Association revealed that discrimination usually occurs by those who have not been educated about fair housing rights and obligations. Major property management companies in Stanislaus County are not members of the California Apartment Association⁴⁶.

Additionally, most nonprofits in the City of Turlock and Stanislaus County provide resources on fair housing but do provide training. That is, they may provide referrals, typically to HUD, Project Sentinel or CRLA. The referral simply provides the agency's contact information, but it is not information on fair housing laws. When the referrals come in to the referral agency, like Project Sentinel, these organizations have flyers and provide phone assistance that explains fair housing laws and rights for residents and landlords alike. No trainings are available for landlords or tenants that are exclusively on fair housing laws. Landlords, including mom and pop owners, are not required to be trained on fair housing laws nor is training available to them outside of the CAA, which they can only attend if they are a member. As a part of other types of training, citizens can be informed of their fair housing rights. For example, a person may come to a nonprofit to receive housing counseling and as part of the program they will learn about fair housing rights. Lastly, HUD affirms that the number of claims is vastly smaller to the number of incidences, because most people are unaware of who to contact or their rights. For example, a property management company does not have to post a sign about fair housing laws in their office. All of these circumstances show the potential for providing additional outreach and education to citizens and landlords.

GOVERNMENT BARRIERS

- 7. Impediment:** Local development standards and their implementation, e.g., zoning, building, or design standards, may constrain development of housing opportunities for minority and low-income households.
- 7.1 Action:** Review zoning and related regulations to determine degree of adequate opportunity in the community for affordable housing to exist and to develop new affordable housing options.
- 8. Impediment:** Inadequate access to employment opportunities, transportation, and public and social services, and infrastructure to support increased housing opportunities for lower-income households.
- 8.1 Action:** Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans.

⁴⁶ For more details see Private Practices, subsection Rental and Property Management

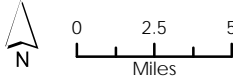
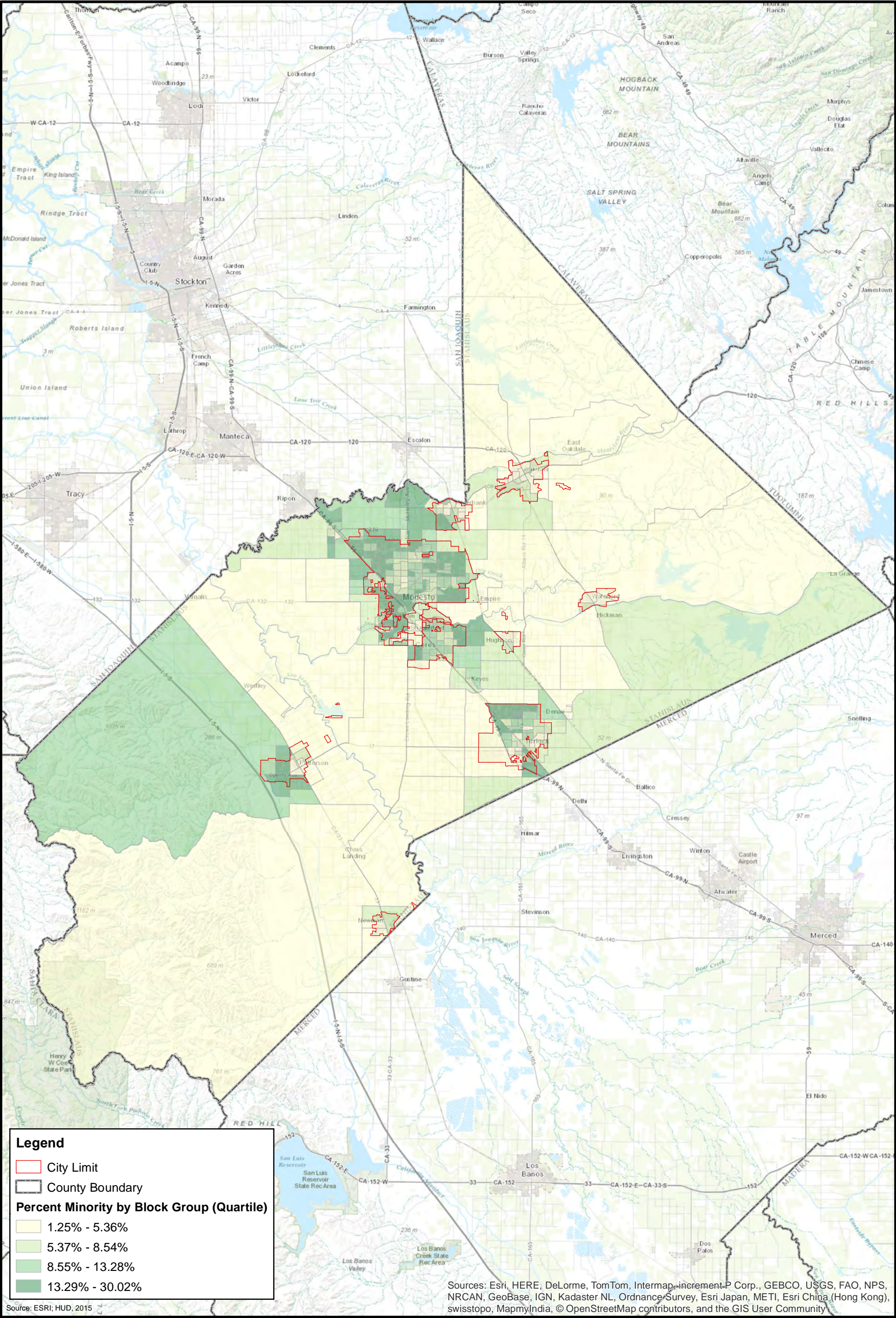
Discussion:

The City of Turlock and Stanislaus County prioritize transitional and supportive housing through their zoning. Stanislaus County's draft Housing Element is proposing to amend the Zoning Ordinance so to identify these uses separately as well as where they are already permitted. The City of Turlock has four programs in its Housing Element Policy 1-3-2 that will address the current constraints on transitional and supportive housing developments in the City of Turlock. Further, Program D addresses the needs for providing additional transitional and supportive housing which is critical ending homelessness. Emergency shelters provide temporary support to those that may be facing temporary or extended homelessness. To this end, the City of Turlock and Stanislaus County reviewed zoning ordinances and did not find obvious barriers; however, continuous review will be important.

Both Stanislaus County and City of Turlock do not have inclusionary housing ordinances. Both plan to update their density bonuses programs to comply with new density bonus law.

Appendices

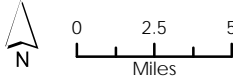
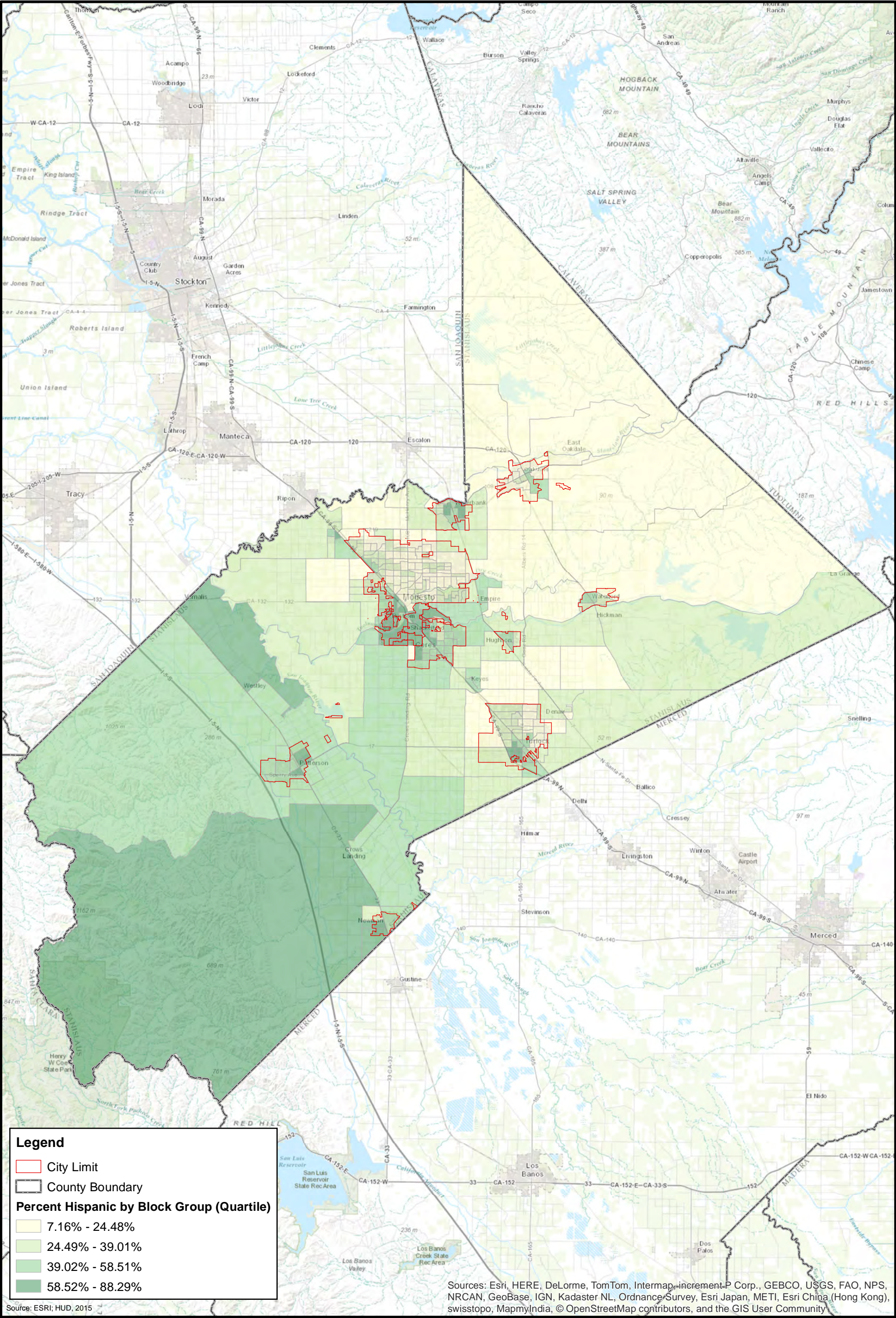
APPENDIX 1.
AREAS OF MINORITY
CONCENTRATION



Map 1
Racial Minority Concentration in Stanislaus County



APPENDIX 2.
AREAS OF HISPANIC
CONCENTRATION



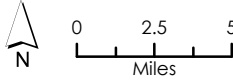
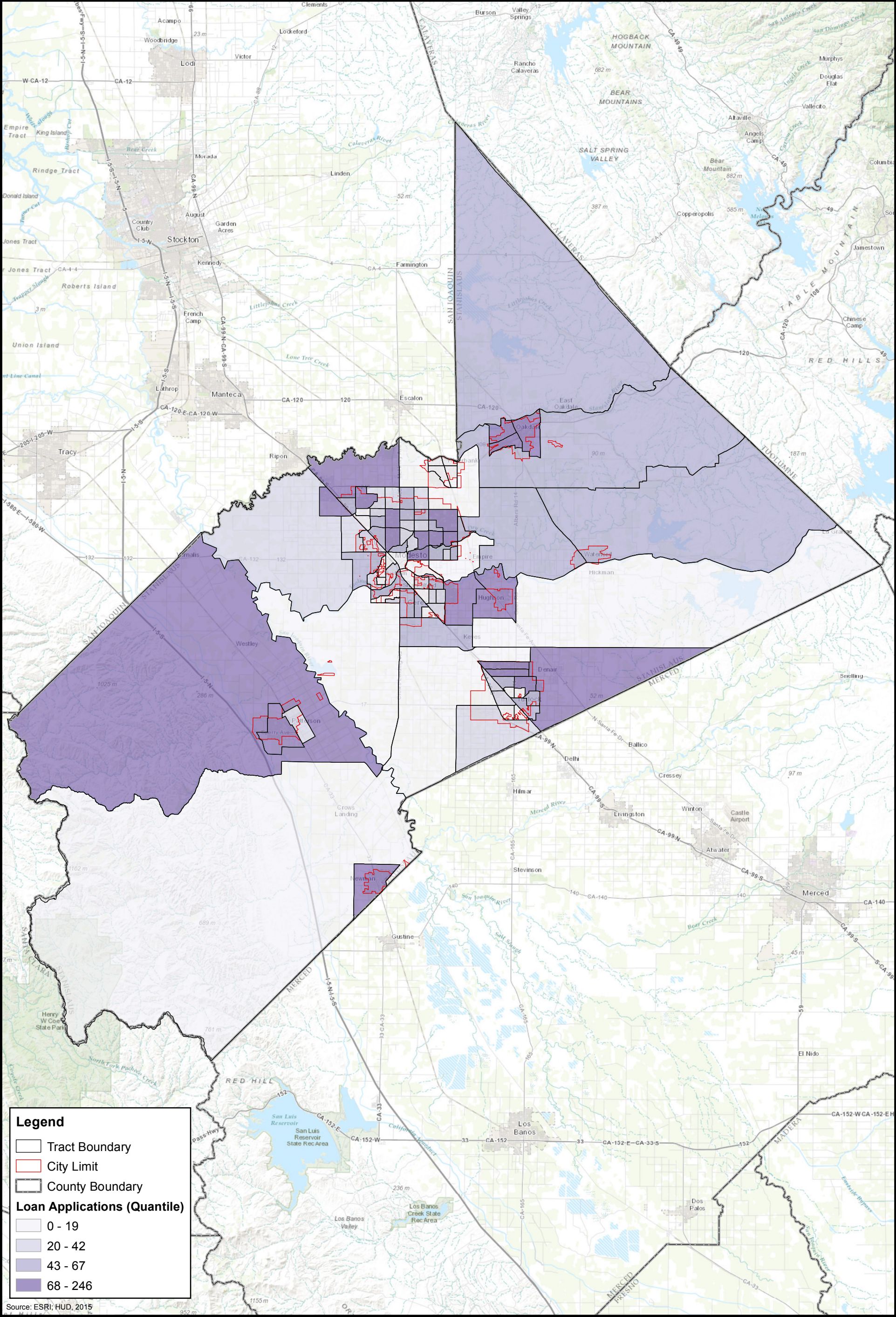
Map 2
Hispanic Concentration in Stanislaus County

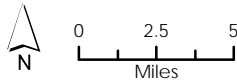
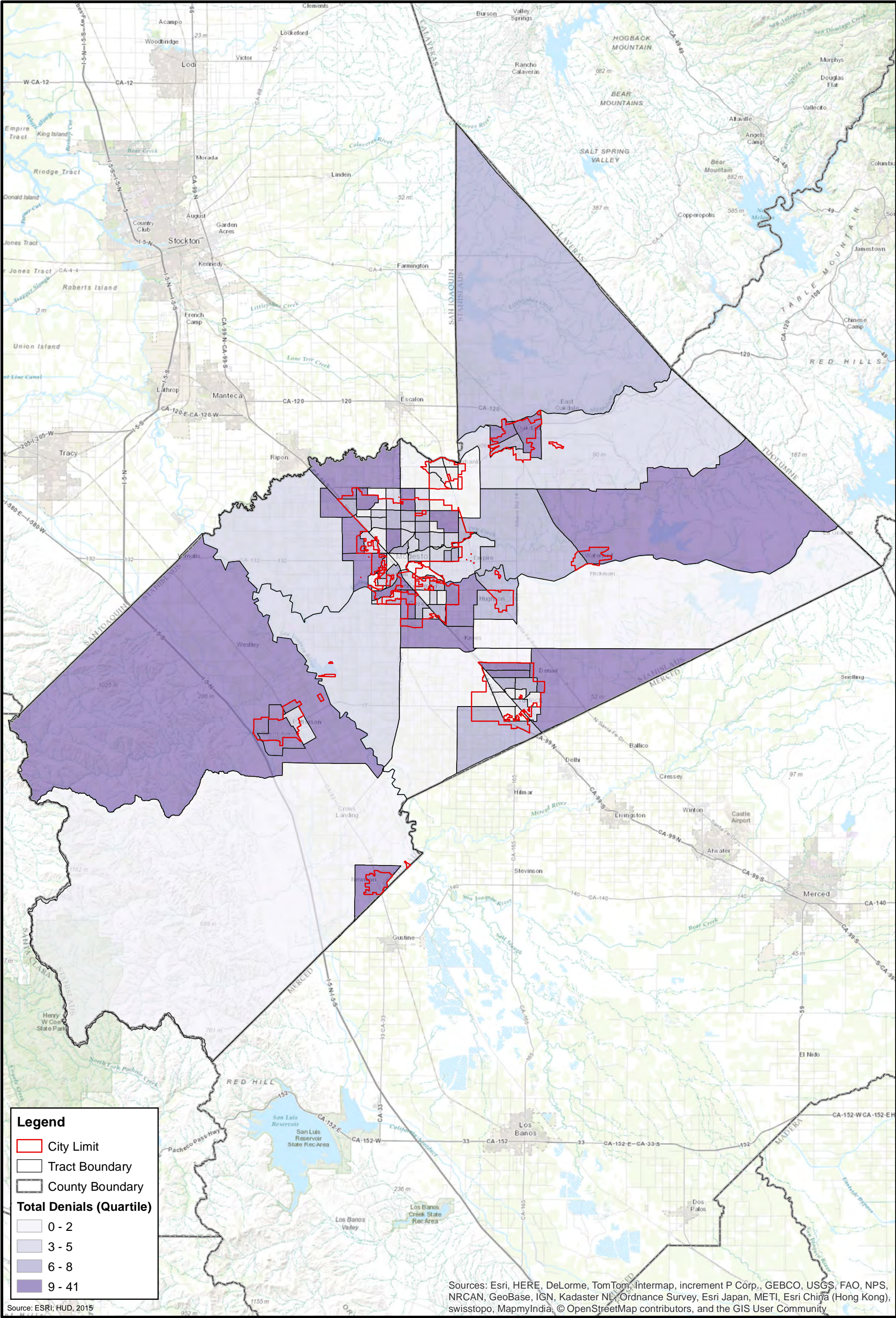


APPENDIX 3.
AREAS OF LOW-INCOME AND VERY
LOW-INCOME CONCENTRATION

APPENDIX 4.

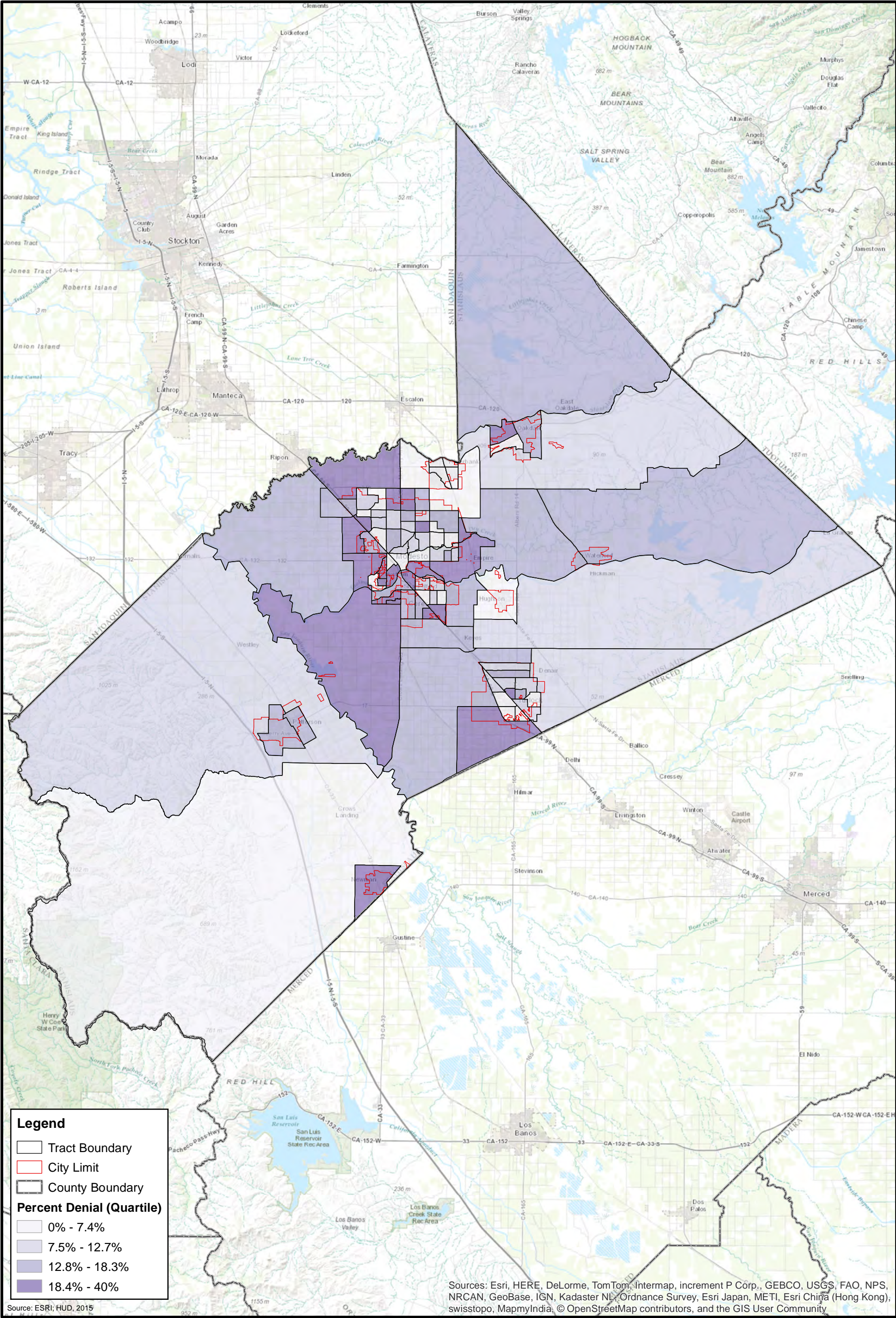
MORTGAGE LENDING PATTERNS



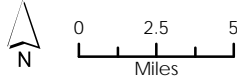


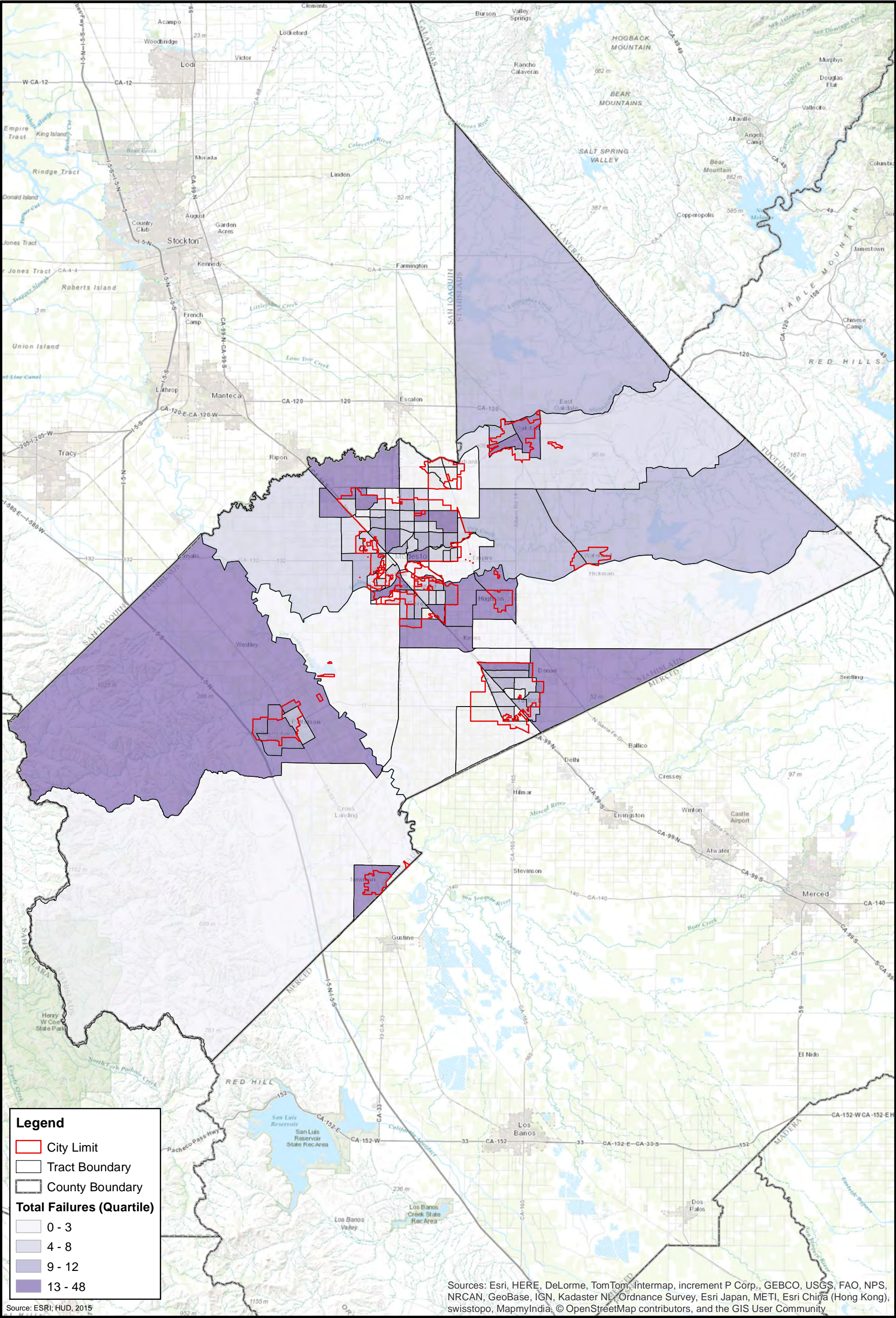
Map 5
Total Loan Denials



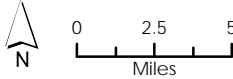


Source: ESRI; HUD, 2015



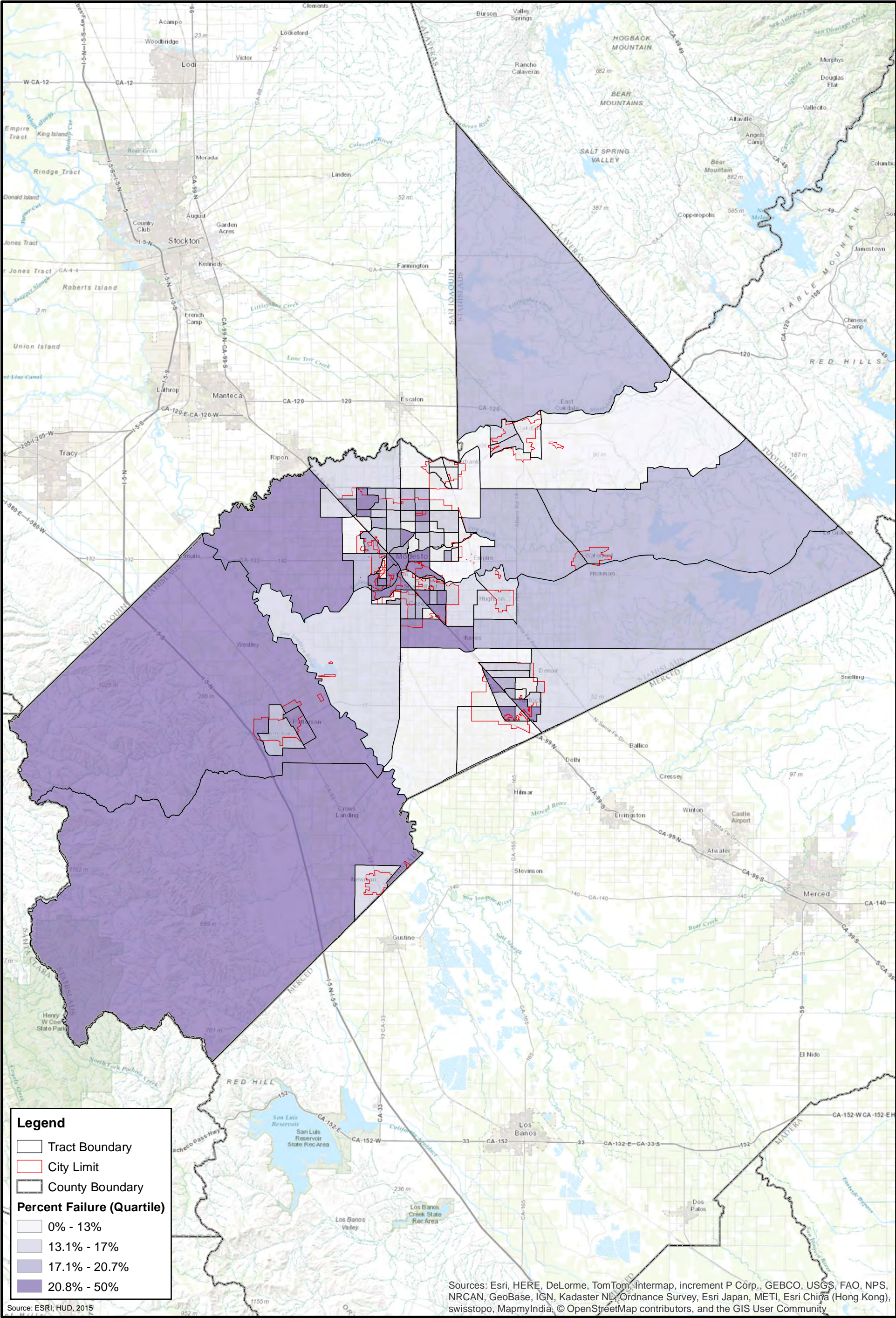


Source: ESRI; HUD, 2015

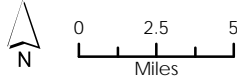


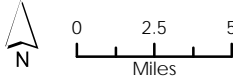
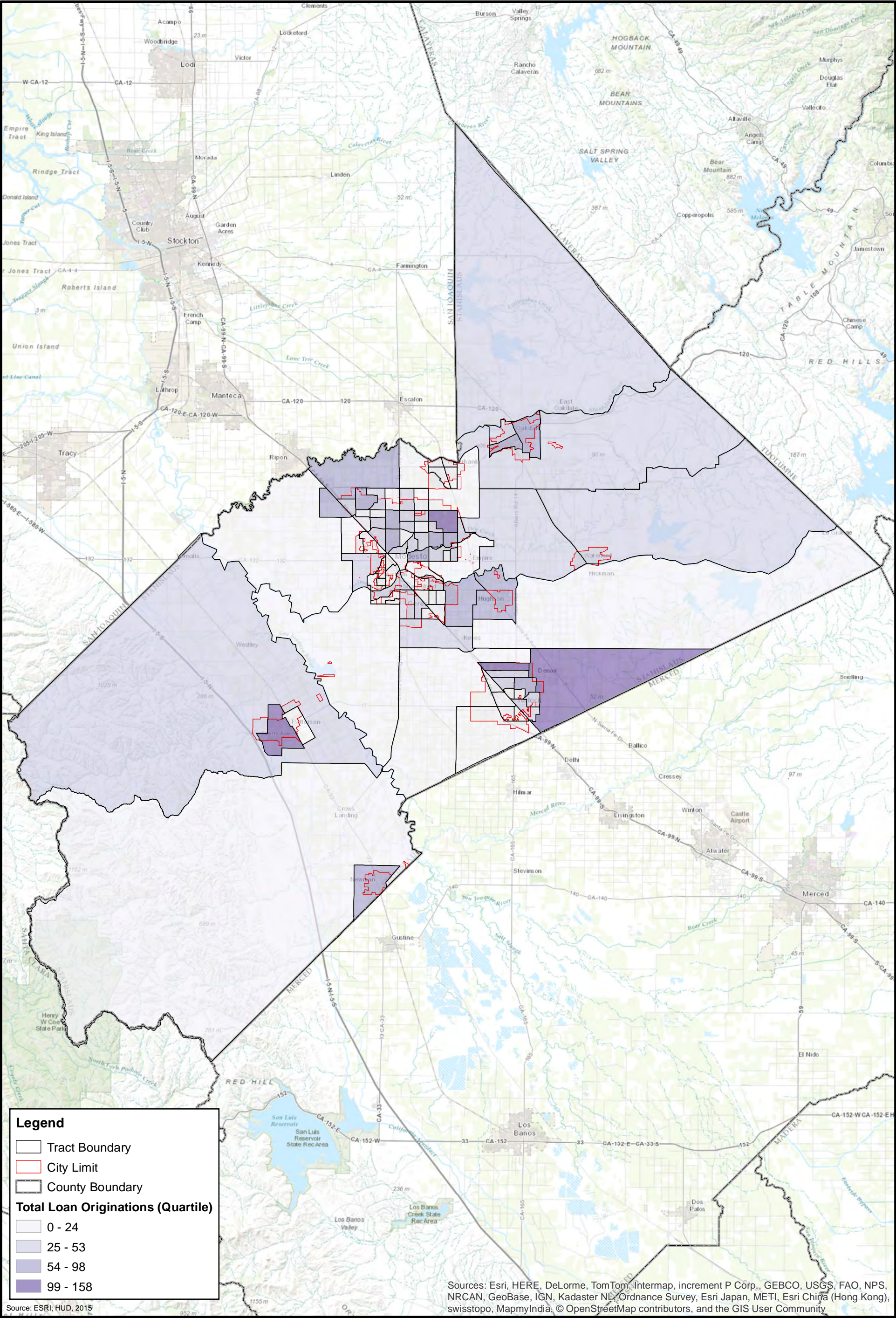
Map 7
Total Loan Failures

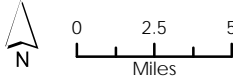
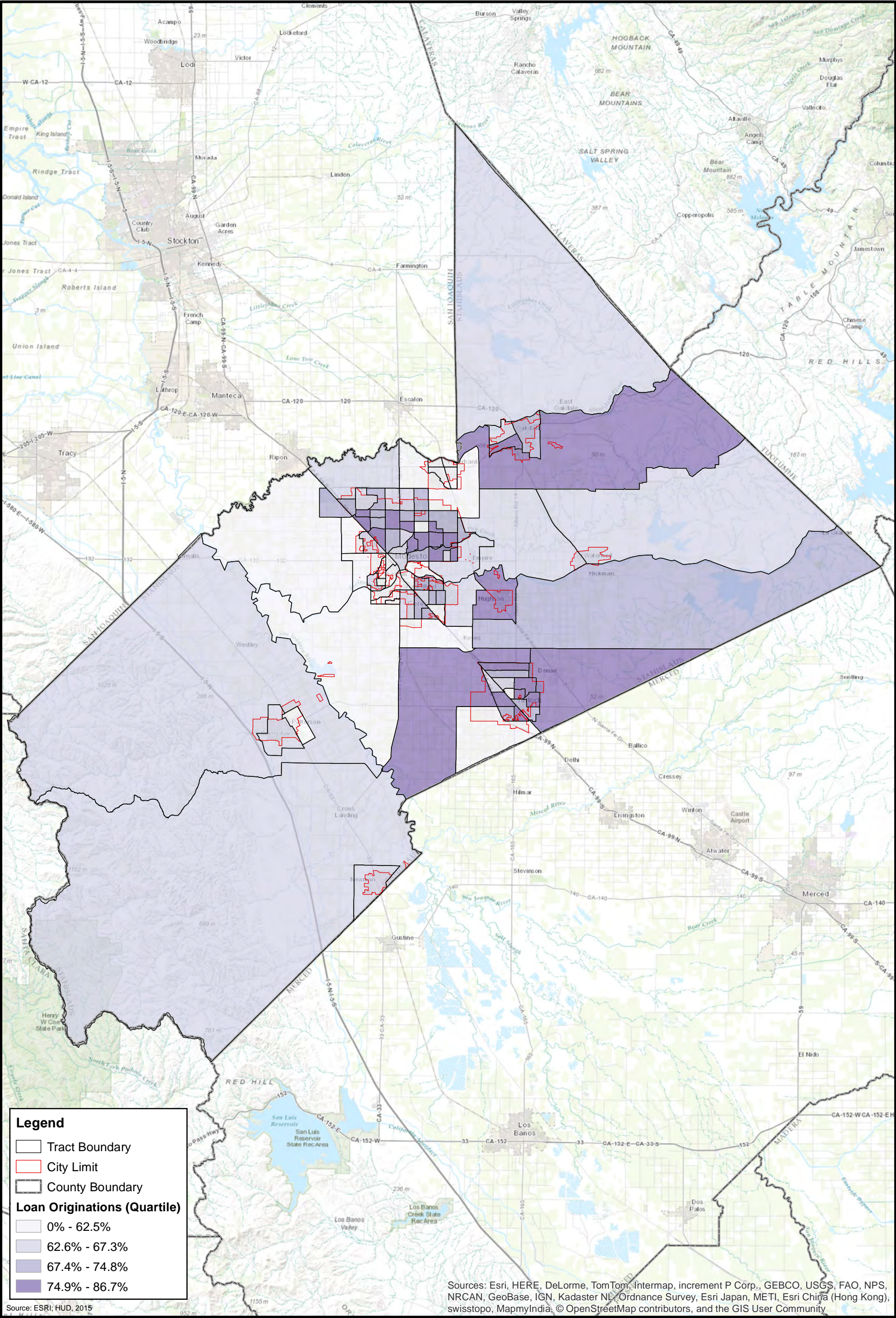




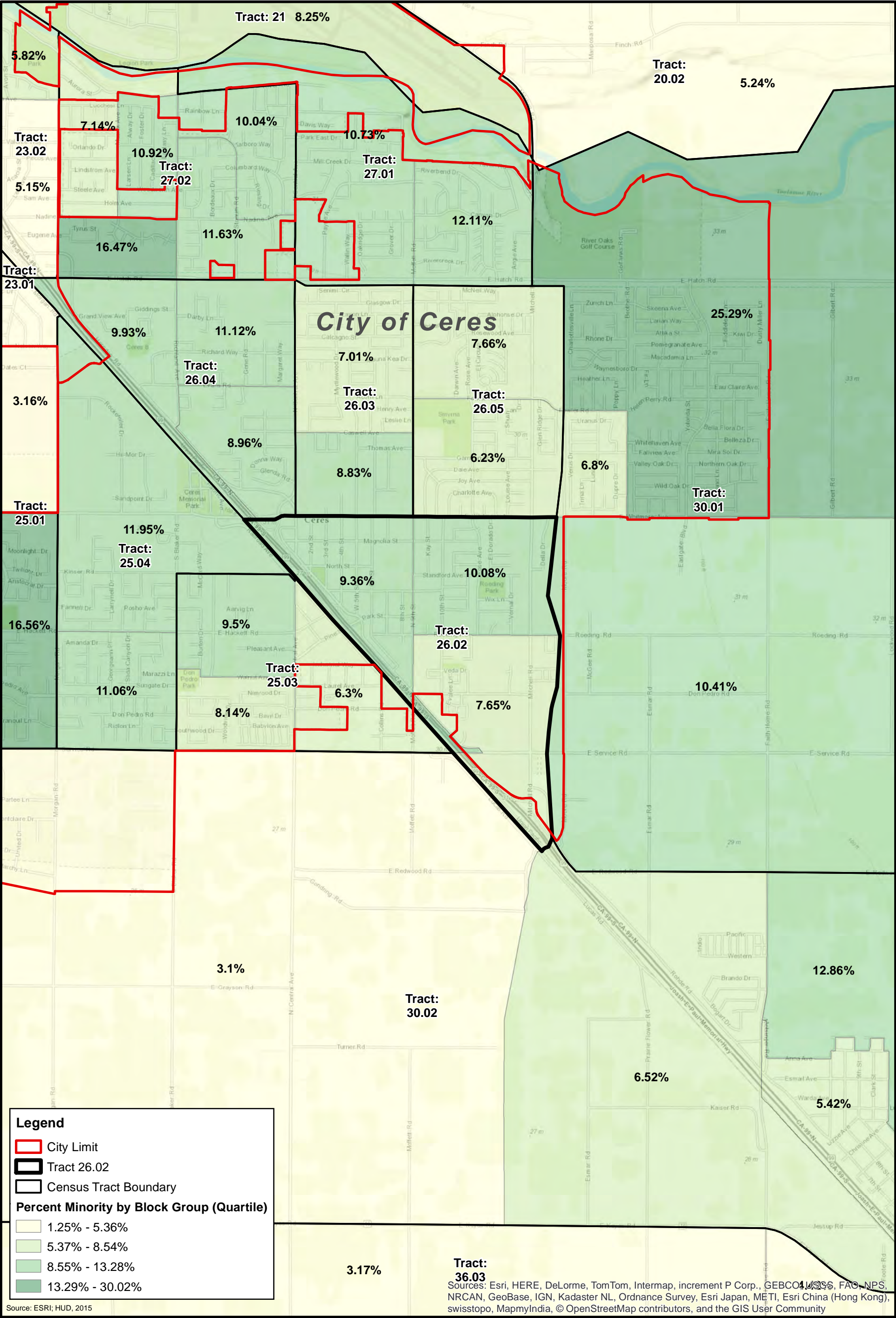
Source: ESRI; HUD, 2015

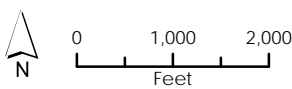
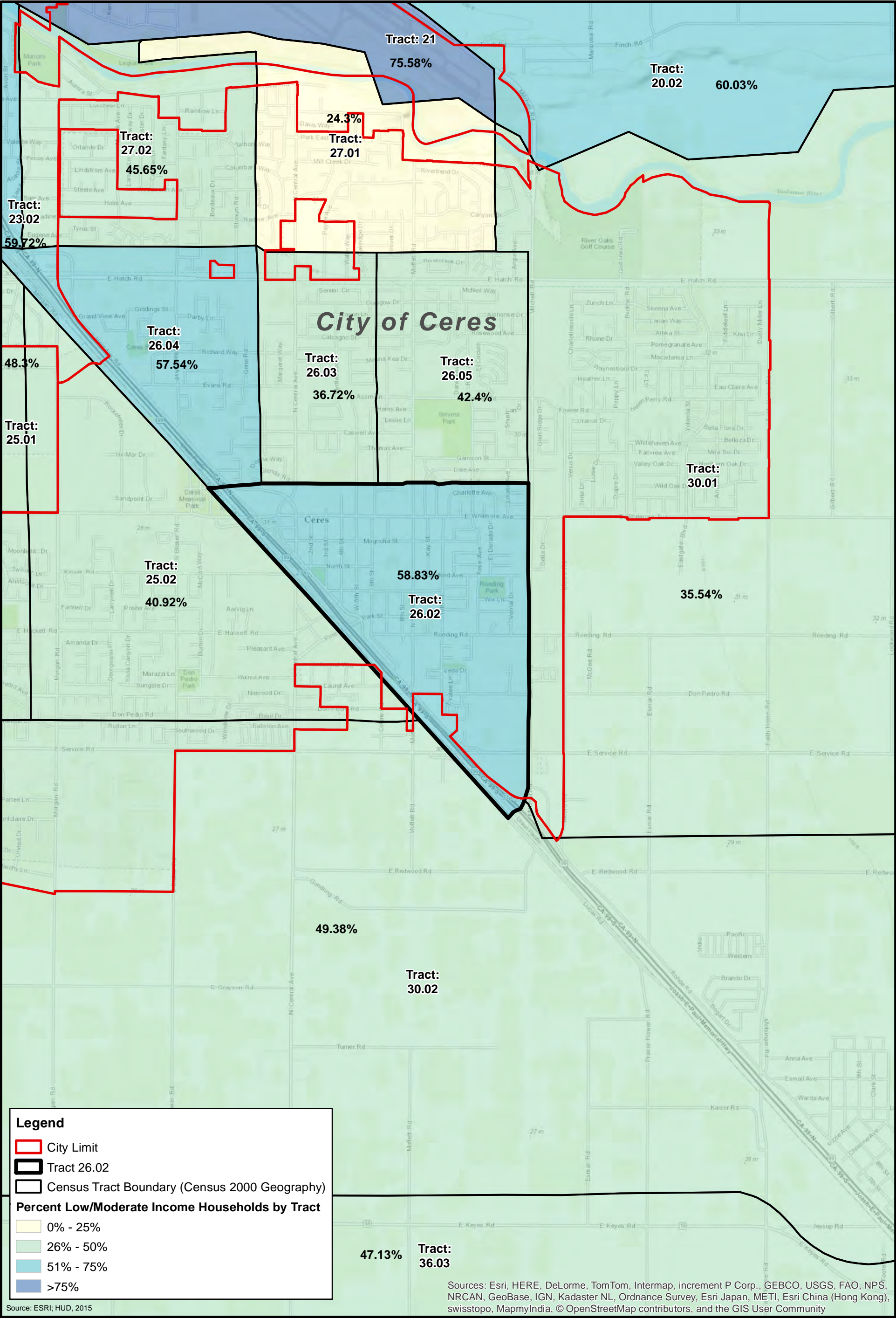






APPENDIX 5.
CENSUS TRACT 26.02





Map 13
Percentage of Low/Moderate Income Households in Stanislaus County



Appendix 6.

Outreach Summary

COMMUNITY PARTICIPATION SUMMARY

INTRODUCTION

The community outreach process included four community workshops, one stakeholder meeting, a print and online survey, and agency phone and email consultations. Overall, more than 600 people provided their feedback on the Fiscal Year 2015-2020 Stanislaus Urban County/City of Turlock Regional Consolidated Plan (Con Plan) and Fiscal Year 2015–2023 Stanislaus County Housing Element. The following is a summary of the responses received during each portion of the outreach process. Overall trends and themes identified are located in the Community Themes section at the end of this summary. The Community Themes section takes into account results and feedback from all input events and methods. Complete meeting notes, sign-in sheets, survey data, and agency consultations are provided following this summary.

COMMUNITY WORKSHOPS

The workshops each began with a presentation; then, workshop participants were invited to provide their feedback at four activity stations set up around the room. The stations included posters where participants were asked to place dots (stickers) on the posters to prioritize issues and needed services and funding. The full dot voting results for all workshops are included at the end of this appendix.

COMMUNITY WORKSHOP 1 – CITY OF CERES (OCTOBER 15, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Generally participants felt that unsafe neighborhood conditions and homelessness were very common and important to address. Emergency shelters, transitional housing, new affordable housing units, and improvements to the existing rental housing stock were all seen as very important to fund.

Station 2 – Consolidated Plan: Public Service and Facilities

Participants felt that funding for homeless prevention assistance, services for at-risk youth, and employment skills training were important to fund. Curbs and gutters as well as lighting improvements were also identified as very important to fund.

Station 3 – Consolidated Plan: Fair Housing

Participants felt that the greatest barrier to accessible housing was cost. Race and ethnicity was seen as the most common form of discrimination.

Station 4 – Housing Element

Building code enforcement and conserving and improving the existing housing stock were seen as important goals in the Housing Element.

Complete workshop materials, notes, and sign-in sheets are provided following this summary.

COMMUNITY WORKSHOP 2 – CITY OF TURLOCK (OCTOBER 20, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Participants at Workshop 2 felt that new affordable rental housing and transitional housing for the homeless should be a priority for the next five years. Funding priorities were housing for lower-income households, mentally ill persons, and seniors. Services for homeless families with children and youth were also seen as very important to fund by workshop participants.

Station 2 – Consolidated Plan: Public Service and Facilities

In the public services category, participants felt services for low-income households, at-risk youth, and a job creation and retention program were very important to fund. Improvements including neighborhood facilities and street improvements were also categorized as very important to workshop participants.

Station 3 – Consolidated Plan: Fair Housing

Cost, accessibility, and supply were all identified as common barriers to finding housing. Discrimination based on race and ethnicity was identified as the most common form of discrimination. In addition, workshop participants felt that consumers were not aware of their rights under fair housing law.

Station 4 – Housing Element

Workshop participants identified first-time homebuyers programs, energy conservation, assistance for special needs housing, and conserving and improving existing housing as important goals for the Housing Element update.

Complete workshop materials, notes, and sign-in sheets are provided following this summary.

COMMUNITY WORKSHOP 3 – CITY OF OAKDALE (OCTOBER 22, 2014)

No participants attended this workshop.

COMMUNITY WORKSHOP 4 – CITY OF PATTERSON (OCTOBER 29, 2014)

The following feedback was provided at the four activity stations set up around the room:

Station 1 – Consolidated Plan: Housing

Rental housing affordability and overcrowding were identified as the most common housing concerns. Services for homeless families with children as well as individuals without children were very important to fund over the next five years.

Station 2 – Consolidated Plan: Public Service and Facilities

Participants identified facilities serving youth, child care facilities, street improvements, and improving the water supply as important to fund. Programs including homeless services, parent education, and financial literacy were also important to fund. Economic development funds should focus on technical assistance for businesses and employment skills training.

Station 3 – Consolidated Plan: Fair Housing

The most common barriers to housing were identified as cost, accessibility, and type of housing. Participants felt that reasons for discrimination include that consumers are not aware of their rights and landlords/owners are not aware of the law.

Station 4 – Housing Element

Workshop participants identified energy conservation, assistance for special needs housing, development of second units, conservation and improvement of existing housing, encouraging mixed-use development, and working with Habitat for Humanity and other agencies as very important for the Housing Element.

STAKEHOLDERS MEETING – STANISLAUS HOUSING AND SUPPORT SERVICES COLLABORATIVE COMMITTEE (STANISLAUS CoC) (OCTOBER 16, 2014)

Generally participants felt that the collaborative programming between the County, cities, and nonprofits contributed to the success of Con Plan programs. Other things identified as working well included capital improvements, HOME Investment Partnership Program (HOME) and Neighborhood Stabilization Program (NSP) units, some programs for the chronically homeless (including comprehensive case management with a transition period before housing placement, supportive housing, and programs emphasizing home visits), and nonprofit capital facilities (i.e., shelters and transitional housing).

Participants identified that funding gaps were most common for extremely low-income households, chronically homeless, homeless youth, and those living in transitional shelters because they are not considered homeless by HUD.

Although some programs for the chronically homeless were noted amongst the successes, more participants felt there were barriers and funding gaps to providing enough services to the chronically homeless. It was noted that housing homeless youth is challenging because they are often not ready or willing to live in permanent housing. More transitional or emergency housing for homeless youth would be helpful. Another homeless subgroup identified as having a great need is homeless families with children.

Another question was regarding the top barriers to sustaining permanent housing. The group identified the demise of the redevelopment agencies, long waiting lists, lack of funding for case management, mental health issues, bad credit or rental history, projects not being able to pencil out for developers, and job development as some of the top barriers. Some of the top obstacles to housing placement were long waiting lists, drug and GED requirements for applicants, lack of employment, income documentation, timing considerations for the NSP program, and the lack of affordable housing units. Sheltered employment or employment that provides on-the-job training is needed.

Other comments included a discussion on economic development, NSP, coordination and referrals, and homeless prevention services.

Challenges to the success of homeless prevention services included income targeting requirements that are too low and too difficult to meet, uninhabitable substandard housing stock, cost of utility bills, insufficient mental health services, participants terming out of programs, lack of financial literacy and life skills amongst participants, inability of participants to document homeless status, need for willing landlords and employers, and the need to educate those in

substandard housing regarding available resources. Also, sufficient funding from a variety of funding programs for housing as part of homeless prevention programs was identified as a funding gap for homeless prevention. Prevention truly needs to be the focus for homeless prevention programs.

An overall greater level of funding for services and programs was mentioned repeatedly. Staffing the Stanislaus CoC was one suggestion related to funding. Funding for people to afford housing was mentioned repeatedly and lack of funding and overcrowding of emergency shelters was mentioned by several respondents.

The discussion questions, complete workshop notes, feedback forms, and attendance information are provided following this summary.

PRINT AND ONLINE SURVEY

An online survey was provided on the Stanislaus County website from October 20, 2014, to December 1, 2014. The option was also available to complete a written hard copy survey during this same time period. A total of 587 completed surveys were received: 585 English surveys and 2 Spanish surveys. The following survey results section includes results from both the online and print surveys completed.

Of those who indicated their affiliation or role when completing the survey, many worked for the government or a nonprofit organization. Others roles included agriculture, education, and concerned citizens.

SURVEY RESULTS BY QUESTION

Demographics

The first set of questions in the survey was regarding demographics. The majority of survey respondents identified themselves as homeowners (54%), followed by interested resident (41%) and public service provider (21%). Please note that respondents were able to select more than one category.

| I am completing this survey as a(n)... | | |
|--|------------------|----------------|
| Answer Options | Response Percent | Response Count |
| Interested resident | 40.7% | 239 |
| Homeowner | 54.2% | 318 |
| Renter | 14.8% | 87 |
| Public/subsidized housing consumer | 0.3% | 2 |
| Homeless individual | 0.5% | 3 |
| Business owner | 3.7% | 22 |
| Subsidized housing provider | 0.7% | 4 |
| Landlord | 5.1% | 30 |
| Public service provider | 21.1% | 124 |
| Homeless service provider | 4.3% | 25 |
| Housing advocate | 2.6% | 15 |
| Health service provider | 8.3% | 49 |
| Educator | 7.2% | 42 |
| Municipal employee | 10.1% | 59 |
| Other (please specify) | 7.7% | 45 |
| Total | 100% | 587 |

Survey responses came from incorporated cities and unincorporated County, as well as outside of the County. The largest number of responses came from Modesto (34%), followed by Turlock (17%) and Salida (11%). Note that survey respondents that indicated that they are from Modesto may be from unincorporated areas of the County.

Parks and Community Centers

A majority of survey respondents felt it was important to fund facilities serving youth/after school programs (82%), facilities serving seniors (71%), improvements to parks (55%), and improvements to accessibility for seniors and disabled persons (61%). Respondents felt that neighborhood facilities and improvements to technology were maybe OK to fund. Other suggestions included facilities for the homeless and community service centers.

| Please indicate the importance of investing funds in parks and community centers in your community. | | | | |
|---|------------------------|-------------------|-----------------|----------------|
| Answer Options | Yes, Important to fund | Maybe, OK to fund | No, Do not fund | Response Count |
| Facilities serving youth/after school programs | 456 | 90 | 9 | 555 |
| Facilities serving seniors | 392 | 147 | 11 | 550 |
| Neighborhood facilities | 231 | 264 | 41 | 536 |
| Facilities for child care | 258 | 203 | 76 | 537 |
| Improvements to parks | 299 | 211 | 34 | 544 |
| Improvements to accessibility for seniors and disabled persons | 333 | 181 | 28 | 542 |
| Improvements to technology | 187 | 267 | 81 | 535 |
| Other | 45 | 14 | 29 | 88 |

Streets, Sewers, and Storm Drains

A majority of survey respondents felt it was important to fund street improvements (72%), install or repair curb and gutter (54%), install or improve sewer (59%) and storm drainage (62%), improve water supply (73%), install or repair sidewalks (57%), and install or improve street lighting (73%).

| Please indicate the importance of investing funds for streets, sewer, and storm drainage related improvements in low-income communities throughout Stanislaus County. | | | | |
|---|------------------------|-------------------|-----------------|----------------|
| Answer Options | Yes, Important to fund | Maybe, OK to fund | No, Do not fund | Response Count |
| Street improvements | 392 | 131 | 18 | 541 |
| Install or repair curb and gutter | 286 | 209 | 37 | 532 |
| Install or improve sewer | 314 | 191 | 28 | 533 |
| Install or improve storm drainage | 332 | 180 | 23 | 535 |
| Improve water supply | 388 | 127 | 16 | 531 |
| Install or repair sidewalks | 304 | 191 | 36 | 531 |
| Install or improve street lighting | 394 | 123 | 22 | 539 |
| Other | 29 | 8 | 21 | 58 |

Public Services Programs

Survey participants were asked to rank the importance of providing grant funds to programs that provide public services to low-income persons in their community. Respondents felt that the highest priority should be given to services for at-risk children/youth, seniors, and physically/mentally disabled persons. Lowest priority was to persons recently incarcerated or on parole, persons with substance abuse problems, and for financial literacy.

Economic Development and Business Assistance

Survey participants felt it was important to fund job creation/retention (79%), employment skills training (66%), start-up business assistance (five or fewer employees) (46%), and small business lending (45%). Participants felt it was maybe OK to fund commercial rehabilitation/facade improvement, commercial infrastructure, technical assistance for business expansion/improvement, and economic development studies, specific plans, and program development.

Top Concerns

Participants were asked to rank 21 potential areas or issues to prioritize in terms of housing choices and affordability, cost of living, special needs groups (seniors, those with disabilities, large families, homeless), energy conservation, housing conditions and safety, and infrastructure. Only one of the print surveys was filled in for this question and all issues were ranked equally. The three concerns receiving the largest percentage of the vote on the online survey were (in order of ranking):

1. Providing shelters and transitional housing for the homeless, along with services, to help move persons into permanent housing.
2. Establishing special needs housing for seniors.
3. Ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County.

| Please indicate the importance of investing funds in the following economic development activities in your community. | | | | |
|---|------------------------|-------------------|-----------------|----------------|
| Answer Options | Yes, Important to fund | Maybe, OK to fund | No, Do not fund | Response Count |
| Commercial rehabilitation/facade improvement | 98 | 275 | 122 | 495 |
| Commercial infrastructure | 119 | 274 | 104 | 497 |
| Small business lending | 225 | 215 | 55 | 495 |
| Technical assistance for business expansion/improvement | 133 | 266 | 92 | 491 |
| Start-up business assistance (5 or fewer employees) | 227 | 213 | 55 | 495 |
| Employment skills training | 332 | 138 | 31 | 501 |
| Job creation/retention | 394 | 89 | 15 | 498 |
| Economic development studies, specific plans, and program development | 156 | 258 | 79 | 493 |
| Other | 18 | 6 | 21 | 45 |

Homeless Needs

Survey participants were asked to rank the importance of meeting the needs of certain subpopulations of homeless persons in their community. Households with children was ranked as the highest priority followed by homeless veterans and then unaccompanied youth.

Participants were then asked to identify the greatest needs of certain homeless subpopulations in their community. For households with children, the greatest need was housing followed by case management and temporary rental assistance. For households/individuals without children, the greatest need identified was transitional housing followed by emergency shelter. Mental health services were identified as the highest priority for the chronically homeless. Case management was considered to be most important for unaccompanied youth. Permanent supportive housing was identified as being the most important for homeless veterans. Families and individuals at risk of becoming homeless were in greatest need of temporary rental assistance.

Housing Assistance Needs

Survey participants were asked to identify which housing assistance needs were important to fund. Health- and safety-related home repair (53%), energy efficiency improvements (50%), low-income housing acquisition (45%), and first-time homebuyer assistance (45%) were identified by participants as important to fund. Rehabilitation of public housing, lead-based paint abatement, homeownership/credit counseling, and fair housing/tenant landlord mediation were identified as maybe OK to fund.

In addition, 67 percent of survey respondents felt that providing shelters and transitional housing for the homeless, along with services to help move persons into permanent housing, was very important to fund. Other concerns that were very important included ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County when they become adults (66%) and establishing special needs housing for seniors (66%).

| Please indicate the importance of investing funds for the following housing-related activities in your community. | | | | |
|---|------------------------|-------------------|-----------------|----------------|
| Answer Options | Yes, Important to Fund | Maybe, OK to Fund | No, Do Not Fund | Response Count |
| Rehabilitation of public housing | 205 | 225 | 46 | 476 |
| Energy efficiency improvements | 237 | 179 | 62 | 478 |
| Lead-based paint abatement | 167 | 201 | 107 | 475 |
| Low-income housing acquisition | 215 | 181 | 78 | 474 |
| Health- and safety-related home repair | 256 | 176 | 47 | 479 |
| First-time homebuyer assistance | 216 | 178 | 83 | 477 |
| Homeownership/credit counseling | 187 | 198 | 88 | 473 |
| Fair housing/tenant landlord mediation | 186 | 219 | 68 | 473 |
| Other | 13 | 3 | 11 | 27 |

Housing Types

Participants were asked to identify housing types that were important to fund during 2015–2020. Participants identified emergency shelters (68%), permanent housing for special needs (57%), and transitional housing for the homeless (57%) as the highest priorities.

| Please indicate the importance of investing funds in the following housing-related activities in your community. | | | | |
|--|------------------------|-------------------|-----------------|----------------|
| Answer Options | Yes, Important to fund | Maybe, OK to fund | No, Do not fund | Response Count |
| Emergency shelter | 304 | 126 | 16 | 446 |
| Transitional housing for the homeless | 254 | 164 | 31 | 449 |
| Permanent housing for special needs | 257 | 162 | 29 | 448 |
| Affordable rental housing | 226 | 154 | 62 | 442 |
| Affordable for-sale housing | 189 | 154 | 100 | 443 |
| Improvements to existing rental housing | 136 | 205 | 99 | 440 |
| Improvements to existing ownership housing | 134 | 196 | 113 | 443 |
| Other | 8 | 4 | 12 | 24 |

Housing Populations

Participants were asked to identify which housing populations grant funds should be invested in. Survey respondents identified housing for senior persons (70%), housing for disabled persons (69%), and housing for aging-out foster youth (59%) as the highest priority.

| Please indicate the importance of investing funds in housing for the following populations in your community. | | | | |
|---|------------------------|-------------------|-----------------|----------------|
| Answer Options | Yes, Important to fund | Maybe, OK to fund | No, Do not fund | Response Count |
| Housing for senior persons | 310 | 113 | 18 | 441 |
| Housing for disabled persons | 305 | 124 | 11 | 440 |
| Housing for homeless persons | 224 | 166 | 45 | 435 |
| Housing for large families (5 or more) | 105 | 183 | 151 | 439 |
| Housing for very low-income persons | 202 | 173 | 61 | 436 |
| Housing for aging-out foster youth | 261 | 141 | 37 | 439 |
| Housing for mentally ill persons | 240 | 166 | 32 | 438 |
| Housing for persons recently in jail or on parole | 76 | 206 | 156 | 438 |
| Other | 7 | 2 | 12 | 21 |

Barriers to Equal Access to Housing

Cost was identified as the number one barrier to equal access to housing with 70 percent of respondents indicating that this is very common. Participants also felt that accessibility (for seniors and disabled persons) was also a barrier with 59 percent of the votes.

| Please indicate how common and important it is to address the following barriers to equal housing in your community. | | | | |
|--|-----------------------------------|-------------------------------|--------------------------------|----------------|
| Answer Options | Very Common, Important to Address | Somewhat Important to Address | Rare, Not Important to Address | Response Count |
| Cost | 304 | 88 | 40 | 432 |
| Accessibility (seniors and disabled persons) | 260 | 146 | 35 | 441 |
| Supply (new housing) | 140 | 186 | 115 | 441 |
| Proper size/type of housing | 136 | 189 | 116 | 441 |
| Other | 8 | 8 | 9 | 25 |

Fair Housing

The next group of questions was regarding fair housing in Stanislaus County. Participants identified that discrimination was common and should be addressed in rental housing and mortgage lending. Discrimination was most common in regard to race/ethnicity and disability. The most common types of discrimination included deception regarding availability or price of housing and variation in price, rent, fees, or deposit information. Lack of enforcement, lack of reporting, consumers not being aware of their rights, and sellers/landlords not being aware of the law were all seen as reasons for unfair housing practices. Education was identified as the best method to combat housing discrimination.

| Please indicate how common and important it is to address the following areas of housing discrimination in your community. | | | | |
|--|-----------------------------------|-------------------------------|--------------------------------|----------------|
| Answer Options | Very Common, Important to Address | Somewhat Important to Address | Rare, Not Important to Address | Response Count |
| Rental housing | 197 | 157 | 82 | 436 |
| Housing for sale | 154 | 169 | 111 | 434 |
| Mortgage lending | 171 | 152 | 110 | 433 |
| Other | 6 | 7 | 9 | 22 |

| Please indicate how common and important it is to address the following areas of housing discrimination in your community. | | | | |
|--|-----------------------------------|-------------------------------|--------------------------------|----------------|
| Answer Options | Very Common, Important to Address | Somewhat Important to Address | Rare, Not Important to Address | Response Count |
| Race/ethnicity | 154 | 127 | 148 | 429 |
| Language | 141 | 141 | 146 | 428 |
| National origin | 107 | 156 | 165 | 428 |
| Gender | 91 | 142 | 192 | 425 |
| Disability | 193 | 134 | 102 | 429 |
| Familial/marital status | 99 | 149 | 180 | 428 |
| Sexual orientation | 97 | 133 | 198 | 428 |
| Other | 7 | 8 | 17 | 32 |

| Please indicate how common and important it is to address the following areas of housing discrimination in your community. | | | | |
|--|-----------------------------------|-------------------------------|--------------------------------|----------------|
| Answer Options | Very Common, Important to Address | Somewhat Important to Address | Rare, Not Important to Address | Response Count |
| Refusal to rent/sell | 120 | 144 | 158 | 422 |
| Refusal to show | 90 | 145 | 184 | 419 |
| Deception regarding availability or price | 169 | 126 | 123 | 418 |
| Different price, rent, fees or deposit | 184 | 113 | 121 | 418 |
| Other | 5 | 5 | 15 | 25 |

| Please indicate why housing discrimination might still happen in your community. | | | | |
|--|-------------------------|----------------------------|--------------------|----------------|
| Answer Options | Yes, This is One Reason | Maybe, Might be the Reason | No, Not the Reason | Response Count |
| Lack of enforcement | 188 | 155 | 71 | 414 |
| Lack of reporting | 221 | 136 | 57 | 414 |
| Consumers are not aware of rights | 227 | 136 | 52 | 415 |
| Sellers/landlords are not aware of the law | 167 | 153 | 95 | 415 |
| Other | 13 | 3 | 10 | 26 |

| Please indicate which are effective ways to combat housing discrimination in your community. | | | | |
|--|------------------------|---------------------------|----------------------------|----------------|
| Answer Options | Yes, This is Effective | Maybe, Might be Effective | No, Would Not be Effective | Response Count |
| Education | 304 | 101 | 26 | 431 |
| Enforcement | 283 | 115 | 31 | 429 |
| Reporting | 277 | 124 | 27 | 428 |
| Other | 8 | 1 | 9 | 18 |

SURVEY RESULTS BY JURISDICTION

Survey results were further broken down based on location of the participant. The following is a summary of the responses received for Ceres, Hughson, Newman, Oakdale, Patterson, Turlock, and Waterford, as well as other areas of the county including Salida and Modesto.

Ceres

There were a total of 68 survey participants responding from Ceres. Participants from Ceres felt that the following programs and services are most important to fund:

- Job creation/retention
- Facilities serving youth/after school programs
- Housing for senior persons
- Facilities serving seniors
- Install or improve street lighting

Hughson

Thirteen survey participants indicated that they were from Hughson. The following programs and services were most important to fund for Hughson participants:

- Improve water supply
- Ensuring that children who grew up in Stanislaus County can afford to live in Stanislaus County
- Job creation/retention

Newman

A total of seven survey participants were from Newman. Participants indicated the following were most important to fund:

- Facilities serving youth/after school programs
- Facilities for child care
- First-time homebuyer assistance
- Job creation/retention
- Housing for senior persons and disabled persons

Oakdale

There were a total of 18 survey participants responding from Oakdale. Participants from Oakdale felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Job creation/retention
- Providing shelters and transitional housing for the homeless, along with services, to help move persons into permanent housing
- Emergency shelter
- Housing for senior persons and disabled persons

Patterson

Of the survey participants, 30 were from Patterson. Participants from Patterson felt that the following programs and services are most important to fund:

- Street improvements
- Install or improve street lighting
- Job creation/retention
- Improve water supply
- Facilities serving youth/after school programs

Turlock

A total of 99 survey participants indicated they were from Turlock. Participants from Turlock felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Job creation/retention
- Improve water supply
- Employment skills training
- Facilities serving seniors

Waterford

A total of 28 participants indicated that they were from Waterford. Results of the survey show that the program and services that are most important to fund are:

- Facilities serving youth/after school programs
- Establishing special needs housing for seniors
- Improve water supply

Other Areas

The remaining 329 survey participants were from Modesto, Salida, Riverbank, the unincorporated county, and a few were from other counties.

Salida

A total of 72 participants indicated that they were from Salida. Results of the survey in Salida show that the program and services that are most important to fund are:

- Install or improve street lighting
- Street improvements

Modesto and Surrounding Area

Of the survey participants, 203 indicated that they were from Modesto or unincorporated areas of the County adjacent to Modesto. Participants from this area felt that the following programs and services are most important to fund:

- Facilities serving youth/after school programs
- Street improvements
- Facilities serving seniors
- Improve water supply
- Job creation/retention

CONSULTATIONS

The primary trends in the input received during the consultations included:

- Need for more mental health services.
- As the economy recovers the people most likely in need will be those with fewer skills and less education.
- Shortage of experienced staff and lack of funding to employ experienced staff persons continues to be a problem.

COMMUNITY THEMES

The outreach effort for the Fiscal Year 2015-2020 Stanislaus Urban County/City of Turlock Regional Consolidated Plan and Fiscal Year 2015–2023 Stanislaus County Housing Element reached more than 600 interested participants and more than 40 local agencies. Overall, some general themes emerged throughout the process that will help guide the development of the Consolidated Plan and Housing Element. The themes can be broken down into the following six topic areas.

HOUSING FOR SENIORS, DISABLED PERSONS, AND YOUTH/FAMILIES

Housings for seniors, disabled persons, and youth/families were seen as a priority to both participants at the workshops and survey participants. Many participants agreed that homelessness was a priority to address in the next five years. Participants identified providing shelters and transitional housing for the homeless as important to fund.

PUBLIC SERVICES AND FACILITIES FOR YOUTH, SENIORS, AND DISABLED PERSONS

Respondents felt that the highest priority should be given to services for at-risk children/youth, seniors, and physically/mentally disabled persons. Facilities serving youth/after school programs were also identified as very important to many of the county's jurisdictions and was identified as a top priority overall.

HOMELESS SERVICES

Homeless services and needs were emphasized in the various forums. It was a focus of input from the Stanislaus CoC and was the top concern of the 21 issues ranked in the online survey. Homeless issues were identified as concerns and priorities at all three of the workshops where input was received. Eight percent of the "fill in the blank" comments on the survey in addition to the multiple choice responses were on the subject of homelessness.

HOUSING FOR HOMELESS HOUSEHOLDS WITH CHILDREN

Participants felt that homeless households with children were in the greatest need for support. Many felt that permanent supportive housing and temporary rental assistance was in great need for this subpopulation.

JOB CREATION AND RETENTION

The recession hit a lot of people in Stanislaus County at all educational and skill levels. Participants felt that job creation and retention was very important to fund over the next five years in almost all of the jurisdictions.

FAIR HOUSING

Cost and accessibility were generally identified as the most common barriers to finding housing. Discrimination based on race and ethnicity was identified as the most common form of discrimination.

MAY 2015

