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October 16, 2025

MEMO TO: Stanislaus County Planning Commission

FROM: Department of Planning and Community Development

SUBJECT: GENERAL PLAN AMENDMENT APPLICATION NO. PLN2022-0045 – SIXTH CYCLE HOUSING ELEMENT UPDATE

RECOMMENDATION

Based on the discussion below and on the whole of the record provided, staff is requesting that the Planning Commission provide a recommendation of approval of General Plan Amendment Application No. PLN2022-0045 – *Sixth Cycle Housing Element Update* to the Board of Supervisors. If the Planning Commission decides to provide a recommendation of approval, Exhibit A, provides an overview of all of the findings required for project approval.

PROJECT DESCRIPTION

This is a request to update and amend the Housing Element of the Stanislaus County General Plan, covering the period from January 2023 through December 2031. The purpose of the Housing Element is to: reassess housing needs of existing and future residents based on the most current data available; propose specific goals, objectives, policies, and programs to meet those needs; and comply with the requirements of state law. The proposed 2023-2031 Housing Element includes goals, policies, objectives and programs to further opportunities for housing to households in the unincorporated areas of Stanislaus County (see Exhibit B – *Stanislaus County Draft 2023-2031 Housing Element*). No development project is proposed as part of the Housing Element update.

BACKGROUND

The Housing Element, which is one of the State of California-mandated elements of the General Plan, is unique in that it is the only General Plan element that is reviewed and certified by the California Department of Housing and Community Development (HCD) and must be updated on a cycle specified by the State of California. The Housing Element must ultimately be certified by HCD and found to be in substantial compliance with state law.

California Housing Element law seen significant shifts between the fifth and sixth cycles, with major changes to the Regional Housing Needs Allocation (RHNA) methodology, including setting a higher bar for site selection, stronger requirements for fair housing, including requirements for conducting a deeper analysis of environmental, social, health, and income conditions, and a push to locate affordable housing in high resource areas, more rigorous standards for demonstrating development potential, and increased accountability and penalties for jurisdictions who do not come into compliance.

This sixth cycle update had an adoption deadline of December 31, 2023 which was effectively extended to April 30, 2024. As Stanislaus County (County) did not meet this deadline, the

rezone program included as part of the Housing Element must be adopted before the Housing Element is considered to be in substantial compliance with housing element law in order to be certified. The County's ability to qualify for certain state grant funding is contingent on HCD finding the County in substantial compliance with housing element law.

State law requires that every housing element include an inventory of land suitable and available for residential development to meet the jurisdiction's share of the regional housing need called the Regional Housing Needs Allocation (RHNA). For the sixth cycle update, the State of California identified the need for the Stanislaus Council of Governments (StanCOG) to establish a methodology for allocation of 34,344 units to the 10 local jurisdictions. HCD divides the total number of units required to be accommodated in the eight-year planning period into income categories based on the Area Median Income (AMI) of a metropolitan area. StanCOG adopted a final RHNA Plan on August 17, 2022.

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

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

TABLE 1: STANISLAUS COUNTY RHNA ALLOCATION, BY INCOME LEVEL, AS SET BY STANCOG FOR THE SIXTH CYCLE HOUSING ELEMENT

Jurisdiction	Lower Income Units				Higher Income Units		Total RHNA
	Very Low (less than 50% of AMI)	Low (51% - 80% of AMI)	Very Low + Low	% of Total RHNA	Moderate (81% - 120% of AMI)	Above Moderate (Above 120% of AMI)	
Ceres	706	489	1,195	35.6%	661	1,505	3,361
Hughson	284	196	480	54.5%	122	279	881
Modesto	2,807	1,943	4,750	42.2%	1,981	4,517	11,248
Newman	197	136	333	31.8%	218	497	1,048
Oakdale	414	286	700	42.0%	294	671	1,665
Patterson	1,046	724	1,770	47.6%	593	1,353	3,716
Riverbank	970	672	1,642	45.7%	594	1,355	3,591
Turlock	1,305	903	2,208	38.1%	1,096	2,498	5,802
Waterford	107	74	181	32.5%	115	261	557
Unincorporated County	574	398	972	39.3%	458	1,045	2,475
Total	**8,410**	**5,821**	**14,231**	**41.4%**	**6,132**	**13,981**	**34,344**

DISCUSSION

Housing Needs Assessment

Housing element law requires local governments to adequately plan to meet their existing and projected housing needs, including their share of the regional housing needs allocation. A complete analysis should include a quantification and a descriptive analysis of the specific needs and resources available to address these needs. The Housing Needs inventories: the housing needs of special populations, such as farmworkers, large families, people experiencing homelessness, people with disabilities, seniors, and extremely low-income households; examines housing stock characteristics, such as the age and type of housing available, and housing data, such as overpayment and overcrowding; and provides population, employment, and household characteristics. The Housing Needs also evaluates projected housing needs.

Over 72 percent of the existing housing units in unincorporated Stanislaus County are older than 30 years versus 65 percent in incorporated Stanislaus County. Additionally, roughly 41 percent of the housing units in unincorporated Stanislaus County were built over 50 years ago versus 26 percent of the incorporated housing units. According to Stanislaus County 2024 Assessor data, 596 units, or 1.6 percent of the total housing stock in unincorporated Stanislaus County, are classified as substandard and may be in need of rehabilitation or replacement during the planning period. The Housing Needs Assessment identified unique housing needs for special needs populations existing in unincorporated Stanislaus County including seniors, persons with disabilities, large households, female-headed households, farmworkers, and homeless persons. Actions and programs were incorporated into the Housing Plan in order to address the housing needs for these special populations.

Affirmatively Furthering Fair Housing (AFFH)

Assembly Bill (AB) 686 created a new requirement for housing elements to incorporate AFFH into the planning process and guiding documents utilized for development of the housing element. Under California law, AFFH means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” AFFH regulations require that the Housing Element include an analysis of fair housing patterns and trends at both a local and regional scale including:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and fair housing outreach capacity.

- An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk.

- An assessment of the contributing factors for any identified fair housing issues.

- An identification of other relevant factors, including historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

- AFFH priorities and goals and strategies and actions to implement those goals and strategies, which may include, but are not limited to, enhancing mobility strategies, and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement.

State law defines an AFFH issue as a condition in a geographic area of analysis that restricts fair housing choice, or access to opportunity; these conditions may include segregation or lack of integration, racially or ethnically concentrated areas of poverty (R/ECAP), racially concentrated areas of affluence (RCAA), significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.

The County's AFFH assessment was prepared consistent with HCD's *AFFH Guidance Memo for All Public Entities and for Housing Elements* which provides guidance on the preparation of housing elements and ensures statutory requirements are satisfied, pursuant to Government Code Section 65583(c)(10). This includes the AFFH Data Viewer, which is a tool developed by HCD that features census block group and tract-level data from an expansive collection of sources including data from the American Community Survey (ACS), United States Department of Housing and Urban Development (HUD), Tax Credit Allocation Committee (TCAC), Urban Displacement Project (UDP), and Comprehensive Housing Affordability Strategy (CHAS). Also utilized in the AFFH analysis is a tool developed by the California Office of Environmental Health Hazard Assessment, called the California Communities Environmental Health Screening Tool (CalEnviroScreen), which utilizes existing environmental, health, and socioeconomic data to rank census tracts based on 20 distinct indicators. To assist the County's AFFH analysis, HCD and TCAC created Opportunity Maps which composite data on education, economic, and environmental data to create index scores identifying high-opportunity areas for families with children. The AFFH also utilized local data in its analysis including the Stanislaus County Disadvantaged Unincorporated Communities (DUC) Report, the Stanislaus County Analysis of Impediments to Fair Housing Choice (AI), and community input gathered through a series of methods. See the *Project Outreach and Review* section of this memo for more detailed information on the community outreach conducted for the project. The County's AFFH analysis evaluated disproportionate housing needs, such as overpayment and overcrowding, patterns of segregation and integration, displacement risk, access to opportunity, race and ethnicity, household income, and pollution burden percentiles for each census tract (see Exhibit C – *AFFH Data by Census Tract* for a summary of all of these AFFH data sets by area). Other factors such as fair housing resources, language barriers, access to homeownership, a lack of infrastructure and public services in unincorporated areas, Measure E, which is a voter approved initiative requiring approval by a majority vote of the County voters at a general or special local election prior to approval of the redesignation or rezoning of land from an agricultural use to a residential use, and Measure X requirements, which are guidelines concerning primary and secondary on-site wastewater treatment standards for private septic systems, were also evaluated. The County's AFFH analysis also includes local knowledge about residential development patterns and current conditions in each unincorporated island/fringe neighborhood and community throughout the unincorporated County.

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAA)

The County's AFFH analysis identified four census tracts in Stanislaus County listed as R/ECAPs; three of these R/ECAPs include census designated places (CPDs) in unincorporated Stanislaus County, including Airport, West Modesto (Rouse/Colorado), and Bret Harte/South Modesto. A fourth R/ECAP area is identified in the City of Ceres; however, this R/ECAP is located entirely within the city limits of the City of Ceres and does not fall under the jurisdiction of the County. These CDPs are also located in areas with predominantly Hispanic/Latino residents and elevated rates of poverty.

In contrast, the CDPs of East Oakdale, Orange Blossom, Knights Ferry, Valley Home, Denair are considered RCAAs. These are areas of Stanislaus County where predominately non-Hispanic white population and generally higher median incomes are located.

Housing Constraints

The housing element must identify and analyze potential and actual governmental constraints to the maintenance, improvement, or development of housing for all income levels, including housing for people with disabilities. The analysis should identify the specific standards and processes of these constraints and evaluate their impact on the supply and affordability of housing. The analysis should determine whether local, regulatory standards pose an actual constraint and must also demonstrate local efforts to remove constraints that hinder a jurisdiction from meeting its housing needs. The Constraints analysis looks at codes, enforcement, improvement standards, fees and exactions, land-use controls, local processing and permitting procedures, and non-governmental constraints. The County's biggest housing constraint is a lack of land with access to public water and sewer services. As the County is not a provider of water and sewer services, the County must rely on other service providers to determine if water and sewer service is available to serve potential residential development. During the development phase of the sites inventory, the County vetted the rezone sites through each service provider to ensure appropriate services were available.

Housing Resources and Sites Inventory

The County's RHNA for the sixth cycle includes a total of 2,475 units, made up of 574 extremely/very low-income, 398 low-income, 458 moderate-income, and 1,045 above moderate-income units. Based on residential densities allowed under current zoning, the sites identified in the inventory can accommodate 944 residential units, which includes 87 moderate-income and 493 above-moderate income units on vacant sites and 135 moderate-income and 225 above-moderate income sites on underutilized sites. In addition, the County was able to apply 252 units from planned and approved housing projects and 184 units of anticipated accessory dwelling unit (ADU) production, all in the above-moderate income category. The vacant and underutilized sites, planned and approved units, and anticipated ADUs exceed the County's RHNA for above-moderate units by 109; leaving an unmet RHNA of 972 lower-income units and 236 moderate-income units.

TABLE 2: STANISLAUS COUNTY RHNA ALLOCATION, BY INCOME LEVEL (NO REZONE SITES)

	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	972	458	1045	2475
Planned and Approved Units	0	0	252	252
ADUs Anticipated	0	0	184	184
Total Units on Vacant Sites	0	87	493	580
Total Units on Underutilized sites	0	135	225	360
Remaining RHNA	**972**	**236**	**-109**	**1099**

As illustrated in Table 2, the County does not have sufficient land already zoned appropriately to meet its share of its lower- and moderate-income RHNA and as such to address this requirement, the County has identified specific parcels to rezone to meet the shortfall. The Housing Element's Housing Plan commits the County to rezoning the sites (under Action 3-1g) to address the shortfall. The Housing Element analyzed parcels throughout the unincorporated area for their capacity for development, based on development trends, site criteria, and assumptions allowed by state law to estimate sites' potential for development of affordable housing. Sites to be counted towards the County's lower-income RHNA require that a parcel be mostly vacant and between ½ acre and 10 acres in size and have access to connect to public water and sewer services.

The Housing Element identified 48 sites, made up of 88.37 acres, to be rezoned (rezone sites). The sites are located in unincorporated County neighborhoods, pockets and islands within the Local Area Formation Commission (LAFCO) sphere of influence (SOI) of a city, and in established unincorporated communities (located outside a city SOI) to allow the County to meet its remaining allocation for lower- and moderate-income units. The sites are proposed to be rezoned from Rural Residential (R-A), Single-Family Residential (R-1), General Commercial (C-2), and Planned Development (P-D) zoning designations to Multiple-family Residential (R-3) and Mixed Use (M-U) to allow for high-density residential development with a maximum density of 25 dwelling units per acre. Table 3 below summarizes the County's rezone sites.

TABLE 3: REZONE SITES

	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Bret Harte	10	29.67	481	101	8	590
Denair	4	12.41	127	13	0	140
Empire	5	4.77	17	46	8	71
Keyes	3	4.45	58	18	2	78
North Ceres	4	7.97	97	18	1	116
Salida	3	1.48	0	18	3	21
South Ceres	1	4.18	76	7	0	83
West Modesto	18	23.44	248	107	15	370
Total	**48**	**88.37**	**1,104**	**328**	**37**	**1,469**

The proposed rezone program would accommodate development of 1,469 units; made up of 1,104 lower-income units, 328 moderate-income units, and 37 above moderate units.

All of the rezone sites are located in areas within existing urban development with access to sewer and water services, in proximity to commercial corridors, and have access to regular bus service which connects to transit centers and city services. Where needed, all new development that occurs on the rezone sites will require installation of curb, gutter, and sidewalk.

R/ECAP and RCAA Areas in the Sites Inventory

The sites inventory includes vacant and underutilized sites in Airport and Rouse/Colorado (West Modesto), and rezone sites in Bret Harte/South Modesto, surrounding Fairview Park, all three of which are identified as R/ECAPs. Out of the total units identified for the County's RHNA 26 percent of the sites identified are located in a R/ECAP, making up 46 percent of the County's lower-income RHNA, 29 percent of the moderate-income units identified, and 6.7 percent of the above moderate-income units identified. The number of units within each of these CDPs by income group is:

- Airport: 15 moderate-income and 7 above-moderate income units
- Bret Harte (South Modesto - Fairview Park): 445 lower-income and 41 moderate-income housing units
- West Modesto (Rouse/Colorado): 77 moderate-income and 63 above moderate-income units

Within Bret Harte/South Modesto, the largest opportunity for the development of affordable housing units is in the vicinity of Fairview Park where five parcels encompassing a total of approximately 24 acres have a combined capacity of 486 dwelling units. Of these units, 445 are allocated to the lower-income RHNA. These five sites are well located with sewer and water infrastructure available through existing connections to the City of Modesto and access to two elementary schools (Bret Harte and Fairview Elementary) within less than a mile.

The sites inventory includes vacant and underutilized sites in East Oakdale, Valley Home, and Denair, all three of which are identified as RCAAs. Out of the total units identified for the County's RHNA 15 percent of the sites identified are located in a RCAA, making up 13 percent of the County's lower-income RHNA units identified, 8.5 percent of the moderate-income units identified, and 20 percent of the above moderate-income units identified. These CDPs have the following number of units per income category:

- East Oakdale: 161 above-moderate income housing units
- Valley Home: 4 above-moderate income housing units
- Denair: 127 lower-income, 39 moderate-income, and 43 above moderate-income housing units

While there are sites suitable for the development of lower-income housing units in Denair, due to the availability of public water and sewer, no sites suitable for affordable housing were identified in Valley Home, East Oakdale, or Del Rio. As discussed in Chapter 5 – *Housing Resources* of the County's draft sixth cycle Housing Element, these areas are infrastructure constrained as there is no municipal sewer service available. All housing units built in these areas would utilize individual septic or on-site package treatment systems to handle wastewater, and, per state law regarding the site inventory, sites that can accommodate lower-income units must have access to public sewer and water service.

Housing Plan

The goals, objectives, policies, and programs set forth in the County's draft Housing Plan serves as guidelines for County actions and decisions in housing-related matters. Consistent with state and national housing objectives, the goals and policies attempt to provide policy and programming direction in response to the data analysis summarized in the housing needs and constraints, AFFH, and housing resources sections of the draft Housing Element.

The plan has five goals, each with its own separate area of emphasis and corresponding policies. Programs are specific actions or procedures designed to implement or carry out policies. Many of the programs are interrelated and applicable to more than one goal or policy. For example, housing programs designed to assist seniors or other special needs households also assist low-income individuals. Similarly, policies designed to provide adequate sites for development also can be viewed as a removal of governmental constraints. The draft Housing Element includes the following Goals and Programs:

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

Program 1-1 Home Rehabilitation Program

Program 1-2 Residential Compliance Program

Program 1-3 Building and Design Standards for Energy Efficiency

Program 1-4 Preservation of At-Risk Affordable Housing

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

Program 2-1 Affordable Housing Development Assistance

Program 2-2 Density Bonus

Program 2-3 Housing Choice Vouchers

Program 2-4 Support Homeownership Opportunities

Program 2-5 Housing Trust Fund

Program 2-6 Regional Collaboration to Facilitate Housing Throughout Stanislaus County

Goal 3: Increase housing production by providing adequate sites for a variety of housing types and removing constraints to residential development.

Program 3-1 Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth

Program 3-2 No Net Loss Zoning

Program 3-3 Replacement Housing

Program 3-4 Provide Adequate Sites for Lower-Income Households on Nonvacant and Vacant Sites Previously Identified

Program 3-5 Adaptive Reuse

Program 3-6 Zoning for a Variety of Housing Types

Program 3-7 Expedited Project Review

Program 3-8 Accessory Dwelling Units

Program 3-9 Infrastructure

Goal 4: Provide housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, and persons with disabilities.

Program 4-1 Housing for Special Needs Populations

Program 4-2 Farmworker Housing

Program 4-3 Homelessness

Program 4-4 Community Outreach and Education

Goal 5: Ensure fair and equal housing opportunities.

Program 5-1 Affirmatively Furthering Fair Housing & Environmental Justice

Program 5-2 Fair Housing Services

Program 5-3 Displacement Prevention, Place-Based Strategies, and Housing Mobility

The Housing Plan also includes actions, which each have specific and quantifiable objectives and timeframes, for the identified goals and programs. The actions that have been incorporated

into the sixth cycle housing plan are a mix of actions that include: geographic targeting, to disadvantaged unincorporated communities, R/ECAPs, or RCAAs; actions targeted to special population groups, such as persons with disabilities, farmworkers, very low-income families, large families, persons experiences homelessness, or seniors; and actions required to be in compliance with state law. See Exhibit E – *Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix* and Exhibit F – *Stanislaus County Sixth Cycle Housing Plan Excerpt* for a list of programs and actions.

Some actions labeled "environmental justice" are part of the County's efforts to integrate environmental justice policies throughout the General Plan, as part of the County's efforts to meet California's Senate Bill (SB) 1000 regulations. Other environmental justice policies will be integrated into other chapters of the County's General Plan through a separate planning and adoption process, following the adoption of the Housing Element.

Many of the programs proposed in the sixth cycle Housing Plan were included in the fifth cycle, such as actions regarding affordable housing development assistance, fair housing services, infrastructure, and farmworker housing; however, the actions proposed with the sixth cycle expand these programs and provide more detail on how the programs will be implemented. For example the sixth cycle Housing Plan expanded actions aimed at assisting farmworkers including: Action 2-1h which will evaluate the possibility of providing Public Facilities Fee waivers or deferrals to farmworker housing occupied by moderate-income farmworkers (between 80 and 120 percent of AMI) and Action 4-2f which will coordinate with the Farmworker Advisory Committee (approved by the Board of Supervisors on November 12, 2024) to enhance understanding and visibility of housing issues facing the County's farmworker population and to share housing resources, such as fair housing service providers, the County's rehabilitation program, and code enforcement reporting. The sixth cycle Housing Plan also includes actions calling for the development of criteria to assist in the prioritization of infrastructure and affordable housing projects based on criteria such as areas at a high-risk of displacement and/or based on the needs of special populations (actions 3-9i and 4-1a).

Actions related to density bonus law, replacement housing, accessory dwelling units, adaptive reuse, and farmworker housing have been incorporated into the Housing Plan to bring the County's zoning ordinance into conformance with updated state laws that have been enacted since the fifth cycle.

New actions were incorporated into the Housing Plan aimed at implementation of Housing Stanislaus, a countywide initiative to develop a unified and actionable vision and strategy framework for housing in Stanislaus County (see https://www.stancounty.com/ceo/housing-stanislaus/ to view the Housing Stanislaus Report). The Housing Stanislaus Initiative produced a report outlining various constraints and strategies which have been integrated into actions that call for integrating more housing options into low-density residential zoning districts, such as missing middle housing (actions 3-1, h, 3-1i, 3-1j, 3-6a, 3-6b, and 3-6k), increasing outreach to property owners and developers (actions 3-1a, 3-1b, 3-1f, 3-2e, 3-7a, 3-7e, 3-7f, 3-8c, 3-8d, 4-2b), increasing local gap funding, such as by developing a local housing trust fund, and diversifying funding sources available for affordable housing development (actions 2-1f, 2-5a, and 3-9d), building staff capacity (actions 4-1d and 3-7d), and implementation of the Housing Stanislaus project (actions 2-6b, 2-6d, and 4-4d).

A few actions were added to address the need to maintain the balance between residential development and the protection of agriculture including: Action 2-6a, which seeks to incorporate the sharing of the RHNA into the LAFCO SOI negotiation process and annexation requests, recognizing the loss of County housing opportunities within the SOI area and County funding provided for housing projects within the city limits; and Action 3-2d, which allows the County to identify Measure E-impacted lands within a LAFCO-adopted SOI or an adopted County Community Plan area for rezoning, and pursue approval from HCD to activate the exemption from County voter approval if it is determined that the County has a shortfall in sites available to meet the RHNA and there is no other land in the County or the cities in the County already designated for urban use that can accommodate the County's legal fair share housing requirement.

Multiple actions have been incorporated into the Housing Plan that will involve potential amendments to the County's zoning ordinance to allow for adaptive, flexible, and alternative housing types, such as single room occupancy development, tiny home villages, or cottage housing (actions 3-5a, 3-6a, 3-6h, and 3-6k)

As required by State of California AFFH requirements the Housing Plan includes new programs and actions aimed at enhancing mobility strategies, encouraging development of new affordable housing in areas of opportunity, place-based strategies to encourage community revitalization, and anti-displacement measures. The Housing Plan also includes programs and actions that are geographically targeted to both R/ECAPs and RCAAs, low resource areas, disadvantaged unincorporated communities, and areas at risk of displacement. Programs 4-4, 5-1, and 5-3 includes new and expanded AFFH and environmental justice actions that deal with community outreach, place-based strategies, diversity, equity, and inclusion, economic and housing mobility, and displacement prevention:

- Community Outreach – Actions aimed at ensuring the County's community outreach meets culturally diverse community needs, including multi-generational families, a variety of living arrangements, and limited English proficiency households, increase accessibility to public workshops by identifying suitable times, preferred meeting types (in person, virtual, or hybrid meetings), having meetings be accessible to persons with disabilities, and having meetings accessible to nearby transit centers, maintaining a list of neighborhood groups and other community organizations, development of a countywide language access policy to ensure residents with limited English proficiency have accessible information, development of an outreach strategy building upon the Housing Stanislaus initiative, and development of an AFFH Marketing Plan checklist for County sponsored affordable housing plans.

- Place-based Strategies – Actions seeking out grant funding to create conceptual land use plans for the re-development of existing communities, seeking federal funding to repair failing septic systems, promotion of development that incorporates walkability and active transportation in compliance with the goals outlined in the Circulation Element, coordination with StanRTA on improvements to public access to bus stops, implementation of place based improvements highlighted in the 2025-2029 Capital Improvement Plan in low resources areas, development of parks projects in Disadvantaged Unincorporated Communities, implementation of the South 9th Street Corridor Plan, and development of the Crows Landing Industrial Business Park to create living wage jobs where people live.

- Diversity, Equity, and Inclusion – Actions that offer training to County staff on a variety of diversity, equity, and inclusion (DEI) topics, and a goal for the County to become a Prohousing jurisdiction.

- Economic and Housing Mobility and Anti-displacement Strategies – Actions that advertise existing workforce training classes offered through Stanislaus County Workforce Development, specifically in R/ECAP and lower-income areas, implementation of the County's Stanislaus 2030 effort, support of economic development efforts in consultation with local economic-focused organizations, preference for Community Reinvestment Act (CRA) rating of "Outstanding", development of home-based economic opportunities in residential neighborhoods (e.g., micro-kitchens, day cares, and home occupations), coordination with a staff point person and local business to provide technical assistance for business start-ups in low resource communities, coordination with the South Modesto Business United group to provide technical assistance for any business displacement associated with development that occurs as a result of the Crows Landing Road rezones, and development of a comprehensive Anti-Displacement Strategy.

As discussed in the *Project Outreach and Review* section of this memo actions related to community outreach, rental housing, place-based strategies, and anti-displacement strategies were added throughout the review process in response to requests from HCD for additional programs and actions.

Many of the actions calling for ordinance amendments are included in General Plan Amendment (GPA), Rezone (REZ), and Ordinance Amendment (OA) Application No. PLN2025-0053 – Sixth Cycle Housing Element Implementation, which is scheduled to be considered by the Planning Commission during their October 16, 2025 meeting.

PROJECT OUTREACH AND REVIEW

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

These entities were included in all notifications associated with the Housing Element update, including invitations to attend community events, to complete a housing survey and participatory map exercise, and notices of the availability of each draft of the Housing Element and the Housing Element Implementation package. Outreach summaries were provided in Spanish. A detailed summary of the public participation is provided in Appendix A of Exhibit B - *Stanislaus County Draft 2023-2031 Housing Element* or can be viewed at the following link: https://www.stancounty.com/planning/pl/general-plan.shtm.

A housing survey was released to the public online on August 2, 2022 and remained open until August 15, 2022. The survey was also made available during various community outreach events. A total of 148 people responded to the survey. Input provided by respondents included highlighting the need for more affordable housing and in particular affordable housing near public transit stops, employment, and shopping centers as the most suitable for new housing development.

The County made available a Geographic Information System (GIS) based housing opportunity sites survey from October 12, 2022 to October 31, 2022 on the project website. The sites survey gave the public an opportunity to provide comments and recommendations relating to the rezone sites. The online participatory mapping tool garnered 177 total responses. The following key themes were collected from community input:

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

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

Throughout September and October 2022, one-on-one interviews were conducted with local housing developers, agencies, and housing and community health advocates to gain an understanding of the housing conditions, issues, and opportunities in Stanislaus County. The input received during these interviews provided context on housing needs and constraints in the community. Some of the input received during these stakeholder interviews indicated a need for more flexibility in the County's zoning ordinances to allow for more residential development. These comments were incorporated into the draft Housing Element's Housing Plan as actions that require ordinance amendments and the development of objective design standards.

An in-person workshop was held on October 11, 2022, to gather community input on the site selection component of the Housing Element, as well as on safety and environmental justice issues. During the workshop, participants were encouraged to provide specific input about the ideal location of new housing developments, as well as the type of housing they feel is most needed in the unincorporated County. Participants were asked to view maps of each area of the county and to identify sites with potential for single-family or multiple-family development. Input was received relative to the communities of Denair and Keyes and in the Modesto/Ceres area.

Additionally, residents were provided information on the Safety Element update, including basic findings from a Vulnerability Assessment that was prepared, as well as information on environmental justice policies that will be developed, and were asked to provide feedback on hazards and environmental issues in the county. Both the Safety and Environmental Justice Element updates are in progress and will be processed following adoption of the County's sixth cycle Housing Element.

Planning staff presented the various drafts of the Housing Element to the County's General Plan Update Committee (GPUC) for guidance and direction in development of programs. In September 2022 and August 2023 staff presented an overview of the sixth cycle Housing Element sites inventory and rezone program to the GPUC; and in September of 2024 staff presented the non-RNHA sites added to the rezone program and the proposed ordinance amendments and objective design standards.

The Housing Element must ultimately be certified by HCD and found to be in substantial compliance with state law; substantial compliance requires County Board of Supervisors adoption of both the Housing Element and the rezone program. The process for review of the Housing Element, both by the public and by HCD, is mandated by the State of California. The first draft of the Housing Element is legislatively required to undergo a 90-day review by HCD; with each subsequent draft receiving 60-days for HCD review. Each Housing Element draft must also undergo a new public review period; 30-days for the first draft and 7-days for each subsequent draft.

The County submitted four official drafts of the sixth cycle Housing Element to HCD between November 2023 and September 2025; one for a 90-day review period and three for 60-day review periods; the drafts were released to the public for review six times between August 2023 and September 2025, once for a 30-day period and the other five times for a minimum of seven-days. A summary of HCD and public comments received, and edits made in response to these comments for each draft is summarized below.

First Housing Element Draft

The first draft of the County's sixth cycle Housing Element Update was circulated for a 30-day public review from August 31, 2023 to October 3, 2023. This public release was accompanied by a 90-day referral to Native American Tribes as required by California SB 18.

Three presentations were made to Municipal Advisory Councils (MACs) in September and October of 2023. The South Modesto MAC meeting was held on September 14, 2013, the Denair MAC meeting was held on October 3, 2023, and the Keyes MAC meeting was held on October 19, 2023. No Empire MAC meeting was held during the public comment period due to a lack of quorum. Input collected from the MAC meetings indicated a need to ensure that residential development occur on sites that have access to water and sewer and in areas that are accessible to commercial corridors. Concerns about development impacts to traffic, flooding, emergency response times, and to bus service were also raised.

Six comment letters were received during the 30-day public review period (August 31, 2023 to September 30, 2023) including responses from the Stanislaus County Community Services Agency (CSA) and Department of Environmental Resources (DER) providing clarifications of data included in the draft Housing Element, two responses from residents (Salida and Patterson) requesting parcels be added to the sites inventory, a response from the Modesto Irrigation District (MID) with basic regulatory information about parcels that fall within their district for irrigation, and electrical service, a response from Self-Help Enterprises, a local non-profit developer, encouraging the County to incorporate programs and actions in the Housing Element that would allow for manufactured homes, fee waivers or deferrals, and general input on the County's sites inventory.

After the close of the public review period of the first draft of the sixth cycle Housing Element, County staff received a response letter from the California Rural Legal Assistance (CRLA) which outlined deficiencies with the draft Housing Element including inadequate public outreach, a flawed fair housing assessment, a lack of local knowledge, a deficient sites inventory and site analysis, a failure of the sites inventory in meeting AFFH requirements, and a failure to address environmental justice requirements. On March 1, 2024, County staff met with CRLA to discuss their concerns with the Housing Element. County staff walked through potential programs with CRLA and provided context for the sites included in the inventory, which were selected for proximity to services, infrastructure availability, and development capacity in compliance with state law. Due to a limited availability of services in high resource areas, development of high-density housing in these areas is infeasible. The County tried to maximize high density residential development opportunities in high resource areas that have access to public water and sewer which was limited to the community of Denair.

After the public review period had ended, the first draft was submitted to HCD for a 90-day review period from November 16, 2023 to February 13, 2023. County staff and HCD discussed HCD's preliminary comments during a call on February 5, 2023. HCD's comments requested revisions in the following areas:

- Additional public outreach should be conducted to get input on housing needs for low-income households and other special needs populations such as farmworkers.
- AFFH analysis.
    - Deeper analysis of R/ECAPS and RCAAs.
    - Need to connect findings to actions for housing mobility, revitalizations, and displacement prevention.
- Demographic and housing needs analysis.
    - Additional data needed for extremely low-income households, housing conditions, farmworker housing needs.
    - Need additional data on land use standards and typical development approval time frames.
    - Needed to add a General Plan consistency analysis.
- Sites inventory.
    - Need additional data to demonstrate development potential.
    - Updates to realistic capacity were required.
    - Need more detail on County-owned sites.
    - Need expanded environmental constraints analysis.
    - Need to submit sites inventory in HCD's electronic format.

- Actions and programs.
    - Need actions to ensure compliance with State of California regulations surrounding emergency shelters, employee housing, supportive housing, and manufactured housing.
    - Actions need specific commitments and quantified objectives.
    - Identified program gaps for addressing the housing needs of extremely low-income households, homeless, and farmworkers, for ADUs, single room occupancy (SRO) developments, infrastructure planning, rezoning, and for use of County-owned land.

In response to the input received from HCD and CRLA the County conducted additional community outreach, including several one-on-one interviews with stakeholders representing the interests of special needs populations. The interviews included local housing and community health advocates, farmworker housing advocates, and affordable housing consultants which provided the County with further understanding of the housing conditions, issues, and opportunities in Stanislaus County. These interviews provided additional details on housing concerns within the County and the need for more diversity of the housing stock.

In response to public comments received, the County made multiple edits to the draft Housing Element including the addition of local knowledge, with detailed descriptions of each neighborhood included in the sites inventory, narratives about additional public outreach that was conducted, additional details to the Housing Needs Assessment on pipeline projects and residential development criteria and constraints, corrections to errors pointed out by County departments, additional fair housing and other service provider information, and additional data on trends, patterns, and other data to the AFFH analysis. Amendments to the sites inventory were also made including: the removal of sites that had a low likelihood of redevelopment; expanded analysis on nonvacant sites; revised realistic capacity and allowable densities of rezone sites consistent with Government Code Section 65583.2(i); added a breakdown of the sites inventory by each geographic area; modified the inventory maps to more clearly show each site and the associated address and other relevant information; modified the inventory to include moderate- and above moderate-income units on sites suitable for the development of housing affordable to lower-income households; and added an action to maintain an administrative list of Measure E impacted lands that may be added to the sites inventory if and when the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County's remaining RHNA.

Second Housing Element Draft

After amendments were completed, a second draft was prepared and circulated for a seven-day public review period from August 29, 2024 to September 4, 2024. CRLA requested a 30-day extension and the County approved a 10-day extension to September 14, 2024. Five responses were received: two were received from community members and one from the Valley Improvement Project (VIP) inquiring about where documents could be viewed, concurrent General Plan update projects being undertaken by the County, and about deadlines for the project; a response was received from a community member in the General Agricultural (A-2) zoned area outside of Patterson, requesting that their property be added to the rezone program; and a response was also received from the Oakdale Irrigation District (OID) which indicated that

the project was not anticipated to impact OID operations and provided guidance on general OID requirements, such as keeping easements clear and on encroachment permitting requirements.

The second draft was then submitted to HCD for a 60-day review period on September 16, 2024 and HCD provided revised comments on November 15, 2024. No additional comments on the County's sites inventory were received. However, HCD's comments did request amendments including, providing additional details on infrastructure requirements for new development and more specific commitments to programs targeting farmworkers, the development of ADUs, for the County's rehabilitation program to be expanded to rentals, and geographic targeting for actions addressing emergency shelters, additional details on the County's Measure E action, for expanded actions to ensure the availability and accessibility of infrastructure during the planning period, and for various other minor clarifications throughout the document.

Third Housing Element Draft

After edits were made to address HCD's second round of comments, a third draft was circulated for public review for a seven-day period (from January 28, 2025 to February 3, 2025). One response was received from a community member in the General Agricultural (A-2) zoned area outside of Patterson, requesting that their property be added to the rezone program. The third draft was then submitted to HCD on February 4, 2025, for a 60-day review period; after receiving preliminary comments from HCD additional edits were made (version 3.5) and version 3.5 was circulated to the public for another seven-day review period from March 25, 2025 to March 31, 2025, prior to the close of the 60-day review period which ended on April 4, 2025.

County staff met with CRLA to discuss the draft Housing Element on March 1, 2024, in the middle of HCD's review period. Two responses were received on version 3.5, from CRLA and VIP, both requesting additional community engagement and for more detailed and targeted programs. Additionally, CRLA's letter requested that the County provide a more detailed analysis of patterns and trends in R/ECAP areas, raised concerns with the County's sites inventory having too many lower-income sites identified in lower resource areas, and recommended the County incorporate specific programs including an inclusionary housing program, a rent control ordinance, and actions requiring additional investment in programs serving the unhoused and farmworkers.

HCD provided comments on the County's third draft on April 4, 2025 which indicated additional edits were required to be made to the County's draft programs including more specific commitments, discrete timing, metrics, and geographic targeting, and added actions that address AFFH, environmental justice, housing mobility, displacement prevention, infrastructure, place-based strategies, and commitments to conduct outreach and engagement; additionally, HCD's response requested that additional local knowledge be integrated into the sections of the Housing Element addressing R/ECAP areas and that the County continue to conduct community outreach as the Housing Element adoption process continued.

The County conducted additional outreach efforts in April and May 2025 to expand community understanding of the sixth cycle Housing Element update, sites proposed for rezoning in the sites inventory, and ordinance amendments. The County attended a series of public meetings, and partnered with CRLA on meetings held in Rouse/Colorado and Parklawn, targeting various neighborhoods throughout the unincorporated County; the meetings included two meetings for South Modesto residents including the South Modesto Businesses United group, representing

Crows Landing Road and the Bystrom corridors of South Modesto, and a Parklawn United Neighbors meeting, representing the Parklawn neighborhood; a farmers market held in the Airport neighborhood (which is a R/ECAP area); two meetings in West Modesto, including a West Modesto Collaborative meeting and meeting organized by CRLA in the Rouse/Colorado neighborhood; and a community event held in the community of Grayson.

During these community meetings the County received a variety of input related to housing, including: concerns with high rental costs and rentals needing repairs; a need for more affordable housing, particularly for persons with disabilities; a need for rental assistance, homeless housing assistance, home repair assistance, and tenant/landlord counseling programs; a need for financing for development of ADUs; a need to address discriminatory practices that are incorporated into the eviction process; a need to address loose dogs and for additional street lighting, road improvements, bus stops, parks, and grocery stores; concerns with a lack of affordability and availability of public services and resources, including water/sewer hookups and electrical services; a need for insurance consultation for homeowners who are dropped from their policies; a need for stronger Code Enforcement policies/improved inspections to ensure rental units are maintained properly and safe to live in; concerns regarding homeless individuals, trash fires, and illegal dumping; and a need for job training assistance programs. General inquiries about the proposed rezone sites were asked, but no objections to the proposed rezones were raised.

Programs and actions addressing these comments were incorporated into Chapter 6 – *Housing Plan*, including: Program 1-1 which focuses on rehab assistance, Program 1-2 which includes an action that enforces the inspection of complaints about habitability issues in rental units, Program 2-3 which aims to increase access to Housing Choice Vouchers, and Program 2-4 which supports homeownership opportunities, which all include targeted outreach to the R/ECAP communities of Airport, Bret Harte, and Rouse/Colorado; Program 3-8 which promotes the development of ADUs, including Actions 3-8f and 3-8g which incentivize and offer funding for the production of ADUs, with focused outreach in RCAAs; Program 3-9 which invests in infrastructure improvements in existing neighborhoods, with a focus on low resource and R/ECAP areas; Program 4-3 which supports homeless housing; Program 5-1 which includes actions aimed at increasing economic development to aid in housing mobility, with a focus on R/ECAP and low resource communities, and non-motorized transportation access in R/ECAP areas; Program 5-2 which includes multiple actions aimed at providing fair housing education, including the availability of rental and utility assistance programs, fair housing investigation services, and tenant landlord counseling; and Program 5-3 which includes actions that will prevent displacement, improve existing communities through parks and roads improvement projects in communities with high displacement risk, including the R/ECAP areas of Bret Harte and Rouse/Colorado.

Fourth Housing Element Draft

After further amending the Housing Element to address comments received, a fourth draft was circulated to the public from July 15, 2025 to July 23, 2025. Two responses were received (see Exhibit G – *Comments Received on the Fourth Draft of the Sixth Cycle Housing Element*). One was an email from the Burbank Paradise Fire District requesting a fiscal plan for how fire districts will be supported to meet projected service demands, a commitment to reevaluating property tax sharing agreements with fire districts serving rezoned communities, and asked that fire protection infrastructure, staffing, and Insurance Services Organizations (ISO) ratings

should be provided to disadvantaged communities. Further the fire district's letter stated that the rezoning of parcels to allow for higher density housing in unincorporated communities like Bret Harte, Crows Landing, Empire, and West Modesto must be matched with a corresponding increase in funding to the independent fire districts that protect these residents and without a mechanism to allocate a fair share of County-collected property and sales taxes to the fire districts serving these areas, this plan will significantly burden response times, staffing levels, and public safety. All proposed rezone sites are located within fire districts and any resulting development will be subject to the payment of adopted fire fees and fire codes which will be implemented at the time of development. Another response received was from CRLA; the letter reiterated similar concerns described in their previous letters and focused on an objection to the sites inventory including too many lower-income units in low resource areas. Several edits were made to the draft Housing Element to integrate suggested language edits to housing element actions provided in CRLA's letter commenting on the County's fourth draft Housing Element.

The fourth draft was then sent to HCD for another 60-day review period on July 30, 2025; after receiving preliminary comments from HCD requesting some minor edits to the County's actions, having to do with anti-displacement programs and geographically targeting of programs to RCAA, a revised fourth draft (version 4.5) was circulated to the public for the required seven-day review period, from September 18, 2025 to September 24, 2025, prior to end of HCD's 60-day review period. Three additional responses were received during the second public review period for version 4.5 (see Exhibit G – *Comments Received on the Fourth Draft of the Sixth Cycle Housing Element*): one response from the City of Modesto indicating they had reviewed the Housing Element update and had no comments, one from the Salida Fire Protection District which requested that the Housing Element address funding for essential fire and emergency response services for residential development within Salida's service area by requiring that new housing development projects within Salida join Salida's Community Facilities District. To address the Salida Fire Protection District's comments, edits were made to the proposed Mixed Use zoning district chapter requiring that any new development annex into their Community Finance District. The third response was received from CRLA restating their previous concerns.

CRLA's letter identified 10 sites in Denair that they recommended be added to the rezone program to allow for additional lower-income units identified in the County's RHNA to be relocated from Bret Harte (South Modesto – Fairview Park) to Denair (see Exhibit I – *Map of Denair, CRLA Recommended Sites*). The County has worked with its consultant to evaluate the potential for rezoning these suggested sites and each of them were determined to be inadequate due to existing development, to a lack of services such as schools, parks, or commercial businesses in the surrounding area, and/or due to their locations along the periphery of the Community of Denair. The Denair Community Plan states:

> "Suitable locations for Medium Density Residential (MDR) and Medium-High Density Residential (MHDR) housing is within the interior of communities, providing residents convenient access to public services, retail shopping and public transit opportunities."

Further the number of acres proposed to be rezoned in Bret Harte and Denair are fairly equivalent with 24.37 total acres in Bret Harte and 21.49 total acres in Denair. The allocation of low-income units in both areas are based on HCD's requirements for parcel size and vacancy for allocating lower-income units; however, low-income housing is not required to be built and either area could be developed with high density market rate housing. In evaluating the

potential for adding sites in Denair, the County identified that 25 above-moderate sites were erroneously included in the sites inventory for Denair. These have been removed revising the sites inventory on the rezone sites in Denair to include 127 lower-income and 13 moderate-income units.

Both CRLA and HCD provided a number of suggested language edits to various housing actions, the majority of which were incorporated into the County's draft sixth cycle Housing Element; these minor edits included additional RCAA targeting, and a new anti-displacement action. The County's submitted this revised version again to HCD on September 25th and on September 29, 2025 HCD provided the County with a letter indicating that the revised draft element, including revisions, meets the state's statutory requirements. However, the Housing Element cannot be found in substantial compliance until the County has completed and submitted the necessary rezones to accommodate the RHNA. HCD's letter stated that the County's Housing Element will substantially comply with State Housing Element Law (Gov. Code, Section 65580 et seq) when rezoning is completed and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code Section 65585 (see Exhibit J – *Comment Letter from the California Department of Housing and Community Development, dated September 29, 2025*).

An additional response was received from CRLA on the 30-day public review conducted for GPA, REZ, OA PLN2025-0053 – Sixth Cycle Housing Element Implementation, which is being simultaneously processed and proposes adoption of the County's rezone sites, objective design standards, and General Plan and ordinance amendments raising similar concerns with the sites inventory (see Exhibit H – *California Rural Legal Assistance Comments on Stanislaus County Housing Element Implementation Package, dated August 1, 2025*).

GENERAL PLAN CONSISTENCY

Consistency with the goals, objectives, and policies of the various elements of the Stanislaus County General Plan must be evaluated when processing all discretionary project requests.

The Housing Element of the General Plan is one component of Stanislaus County's overall long-range planning strategy. The California Government Code requires that the General Plan contain an integrated, consistent set of goals and policies. The Housing Element is therefore affected by policies contained in other elements of the General Plan. State law also requires all parts of the General Plan to be internally consistent.

General Plan amendments affect the entire County and any evaluation must give primary concern to the County as a whole; therefore, a fundamental question must be asked in each case: will this amendment, if adopted, generally improve the economic, physical and social well-being of the County in general? Additionally, the County in reviewing GPAs shall consider how the levels of public and private service might be affected; as well as how the proposal would advance the long-term goals of the County. In each case, in order to take affirmative action regarding a GPA application, it must be found that the GPA will maintain a logical land use pattern without detriment to existing and planned land uses and that the County and other affected government agencies will be able to maintain levels of service consistent with the ability of the government agencies to provide a reasonable level of service.

The Housing Element is most closely tied to the Land Use Element. The Land Use Element sets the framework for development of housing by laying out the land designations for residential development and indicating the type and density permitted by the County. Working within this framework, the Housing Element identifies priority goals, policies, and programs for the next eight years that directly address the needs of the County's existing and future residents.

The Land Use Element includes a policy to ensure that an effective level of public service is provided within unincorporated areas; Goal Four, Policy Twenty-Two requires that future growth not exceed the capabilities/capacity of the provider of services such as sewer, water, public safety, solid waste management, road systems, schools, health care facilities, etc.

Policy 26 and 27 of the Land Use Element of the Stanislaus County General Plan requires city support of projects located within a city SOI and consultation with cities when a project is located within one mile of a city SOI and within the city's General Plan area. The proposed project was referred to all nine cities within the County. In addition, the County coordinated with the cities of Ceres and Modesto on development of the sites inventory. Both cities have indicated they do not have an objection to the proposed rezone sites located within their SOIs. A referral response received from the City of Modesto indicated they had no comments on the project.

As required by the General Plan's Land Use Element Sphere of Influence Policy, all discretionary projects within the SOI of a sanitary sewer district, domestic water district, or community services district, shall be forwarded to the district board for comment regarding the ability of the district to provide services. If the district serves an unincorporated community with a MAC, the proposal shall also be referred to the MAC for comment. Various rezone sites included in the sites inventory are proposed to be served by the Keyes and Denair community services districts (CSD) and Salida Sanitary District. The Keyes and Denair CSDs and Salida Sanitary District were consulted in the development of the sites inventory and each district indicated that they had the capacity to serve the sites. Each site would be required to meet specific conditions, as determined to be necessary by each district in order to hook up to water and/or sewer services. The draft sixth cycle Housing Element as well as the proposed rezone sites, objective design standards, and ordinance amendments were presented to the Denair, Empire, Keyes, Salida, and South Modesto MACs. With the exception of the Keyes MAC, the MACs voted to support the rezone sites and ordinance amendments. The Keyes MAC voted against support of the project due to the property owners of the rezone sites in Keyes not being present at the meeting. However, property owners of the rezone sites were notified about the proposed rezones on multiple occasions; no objection to the proposed rezones was received from property owners of the rezone sites in Keyes.

In accordance with state law, the Housing Element update will trigger an update of the County's Disadvantaged Unincorporated Communities Report, development of Environmental Justice Policies, and an update to the Safety Element. The update to the Safety Element will need to address climate adaptation and resiliency policies as required by Government Code Sections 65302 and 65302.10. These updates are in progress and will be processed following adoption of the County's sixth cycle Housing Element.

Planning staff believes the County's draft sixth cycle Housing Element is consistent with the General Plan policies listed above.

ZONING ORDINANCE CONSISTENCY

Any amendments to the zoning ordinance must be consistent with the General Plan. The Housing Plan included in the County's sixth cycle Housing Element includes actions that call for various zoning code amendments, rezoning, and for the development of objective design standards (ODS). Implementation of these actions are being processed through a separate project, GPA, REZ, and OA PLN2025-0053 – *Sixth Cycle Housing Element Implementation*, scheduled to be considered by the Planning Commission during their October 16, 2025 meeting.

ENVIRONMENTAL REVIEW

This project has been determined to be generally exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) of the California Code of Regulations. The document is a long-range planning document which provides guidance for policies and programs that will not directly lead to development (see Exhibit K – *Notice of Exemption*).

A Notice of Public Hearing was circulated to all interested parties and responsible agencies for review and comment (see Exhibit L – *Distribution List for Notice of Document Availability and Notice of Public Hearing*). A Notice of Exemption has been prepared for approval as the project will not have a significant effect on the environment. There are no conditions of approval for this project.

An Addendum to the Stanislaus County 2015 General Plan EIR (August 2016, State Clearinghouse Number 2014042087) was prepared for GPA, REZ, and OA PLN2025-0053 – *Sixth Cycle Housing Element Implementation*, which analyzed the changes and potential impacts related to the zoning and land use changes for Housing Element rezone sites and additional rezone sites (collectively "Rezone Sites"), objective design standards, and Stanislaus County General Plan and Code amendments. The Addendum compared the buildout of the proposed project with the buildout scenario presented in the General Plan EIR. Any future actions undertaken by the County to implement other policies and programs proposed as part of the County's sixth cycle Housing Element will also undergo individual project level review.

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Attachments:

Exhibit A – Findings and Actions Required for Project Approval
Exhibit B – Stanislaus County Draft 2023-2031 Housing Element
Exhibit C – AFFH Data by Census Tract
Exhibit D – Stanislaus County Sixth Cycle Sites Inventory
Exhibit E – Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix
Exhibit F – Stanislaus County Sixth Cycle Housing Plan Excerpt
Exhibit G – Comments Received on the Fourth Draft of the Sixth Cycle Housing Element
Exhibit H – California Rural Legal Assistance Comments on Stanislaus County Housing Element Implementation Package, dated August 1, 2025
Exhibit I – Map of Denair, CRLA Recommended Sites
Exhibit J – Comment Letter from the California Department of Housing and Community Development, dated September 29, 2025

Exhibit K – Notice of Exemption
Exhibit L – Distribution List for Notice of Document Availability and Notice of Public Hearing

Findings and Actions Required for Project Approval

1. Find the project is generally exempt for the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061 and Section 15282(h) and order the filing of a Notice of Exemption with the Stanislaus County Clerk-Recorder pursuant to CEQA Guidelines Section 15062.

2. Find that there is no substantial evidence the project will have a significant effect on the environment and that the exemption reflects Stanislaus County's independent judgement and analysis.

3. Order the filing of a Notice of Exemption with the Stanislaus County Clerk Recorder's Office pursuant to CEQA Guidelines Section 15062;

4. Find, based on the discussion in this memo, and the whole of the record that:

    a. The General Plan Amendment will maintain a logical land use pattern without detriment to existing and planned land uses.

    b. The County and other affected governmental agencies will be able to maintain levels of service consistent with the ability of the governmental agencies to provide a reasonable level of service.

    c. The amendment is consistent with the General Plan goals and policies.

5. Approve General Plan Amendment Application No. PLN2022-0045 – *Sixth Cycle Housing Element Update*.

Stanislaus County

Draft 2023-2031 Housing Element

October 16, 2025

Stanislaus County

EXHIBIT B

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Executive Summary

Executive Summary

Introduction

The Stanislaus County 2023-2031 Housing Element is a plan for meeting the housing needs of unincorporated Stanislaus County over the eight-year planning period. The Housing Element describes and analyzes existing and future housing needs and issues; presents specific goals, policies, and implementation actions to address these needs; and ensures that the County maintains its eligibility for State funding for housing, infrastructure, and transportation projects.

The County of Stanislaus is committed to improving access to high-quality housing for residents of all abilities and income levels. The Housing Element lays out a plan to remove barriers to housing production and to better match production with identified housing needs. Some of these strategies include promoting a diversity of housing types, increasing the feasibility of new development of infill and underused sites throughout the County, and focusing the greatest amount of new housing in urban areas near transit and jobs. Through the Housing Element, the County strives to address local needs and affirm that housing is a basic human right for all residents.

Entrance to Denair

Organization of the Housing Element

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

Chapter 01 — Introduction
Provides a historical context of the County and introduces main topics of the housing element.

Chapter 02 — Housing Needs Assessment
Reviews current and projected housing needs of the community.

Chapter 03 — Constraints
Identifies obstacles to housing production across income levels.

Chapter 04 — Assessment of Fair Housing
Analyzes fair housing issues and barriers in Stanislaus County.

Chapter 05 — Sites Inventory Analysis & Housing Resources
The Housing Element must contain an inventory of land suitably zoned and available for residential development within the planning period.

Chapter 06 — Housing Plan
Provides goals, policies, and programs to ensure the County meets its share of the regional housing need.

Appendix A — Public Outreach
Summarizes community engagement efforts and materials used.

Appendix B — Review of Past Accomplishments
Evaluates previous housing element outcomes against projected goals.

Appendix C — Sites Inventory
A list of available parcels considered adequate and available for housing development.

Community Profile

Stanislaus County, nestled in California's Central Valley, spans 1,521 square miles and is intersected by two major routes: Interstate 5 and State Route 99. There are three major rivers that run through the County: the Stanislaus, Tuolumne, and San Joaquin. There are nine cities in Stanislaus County, including Ceres, Hughson, Modesto, Newman, Oakdale, Patterson, Riverbank, Turlock, and Waterford. Due to its location near the San Franscico Bay Area, County residents have access to that job market. Since the Bay Area has higher housing costs, many commuters have chosen to live in the County due to lower housing costs.

Agriculture is the number one industry for economic output and employment in the County, followed by two large wineries that contribute to the economic base. The County is home to around 553,000 people, growing rapidly since the 1990s and early 2000s. Through this urban growth, the economic base for the County has diversified to include more non-agricultural jobs. According to the 2020 Census, the largest racial demographic of unincorporated Stanislaus County is Hispanic (53 percent), followed by White (non-Hispanic) (39 percent), two or more races (3 percent), Asian (3 percent), Black or African American (1 percent), American Indian and Alaskan Native (<1 percent), some other race (<1 percent), and Native Hawaiian/Other Pacific Islander (<1 percent).

Diablo Grande

Public Participation

Public engagement for the Housing Element update is focused on the experiences of residents, renters, nonprofits, those vulnerable to housing instability, and builders. The County engaged not only community members, but also representatives of local agencies and housing groups, community organizations, housing developers, and the General Plan Update Committee. Stanislaus County provided opportunities to solicit input from stakeholders and community members through interviews, surveys, a project-specific website, community events, and public meetings.

Through this outreach, the community identified affordability of housing as the most urgent housing need. Other reoccurring themes included concerns regarding existing water and sewer infrastructure, and additional support for new housing in urban areas and with more housing options near existing transit services with pedestrian access. Public input also revealed concern over the Sites Inventory allocation of lower-income units in low-resource areas. This input was integrated throughout the analysis of housing needs, constraints, and considered when developing the Sites Inventory, Housing Strategy, and the Housing Action Plan.

Alongside public outreach for the Housing Element, Stanislaus County partnered with Valley Vision, a non-profit civic leadership consulting firm, to develop and implement an outreach and engagement strategy designed to establish a shared understanding of the needs, challenges, and opportunities for housing within the County as part of the Housing Stanislaus Initiative. Stanislaus County and Valley Vision conducted a series of interviews with key stakeholders and focus group interviews that informed the Housing Element update. Feedback received during this outreach was incorporated into the Housing Element policies and programs. More information on public participation efforts during the Housing Element update can be found in Appendix A, Summary of Public Participation.

Interactive Posters at Community Workshop

Housing Data and Demographics

The Housing Element seeks to provide and maintain safe, decent housing for unincorporated Stanislaus County's present and future residents. Analysis of demographic, socioeconomic, and housing characteristics assists in identifying local housing needs and allows the County to effectively target its programs and resources toward households with the greatest need. Chapter Two, Housing Needs Assessment, provides housing and demographic information of Stanislaus County residents.

Key population findings include:

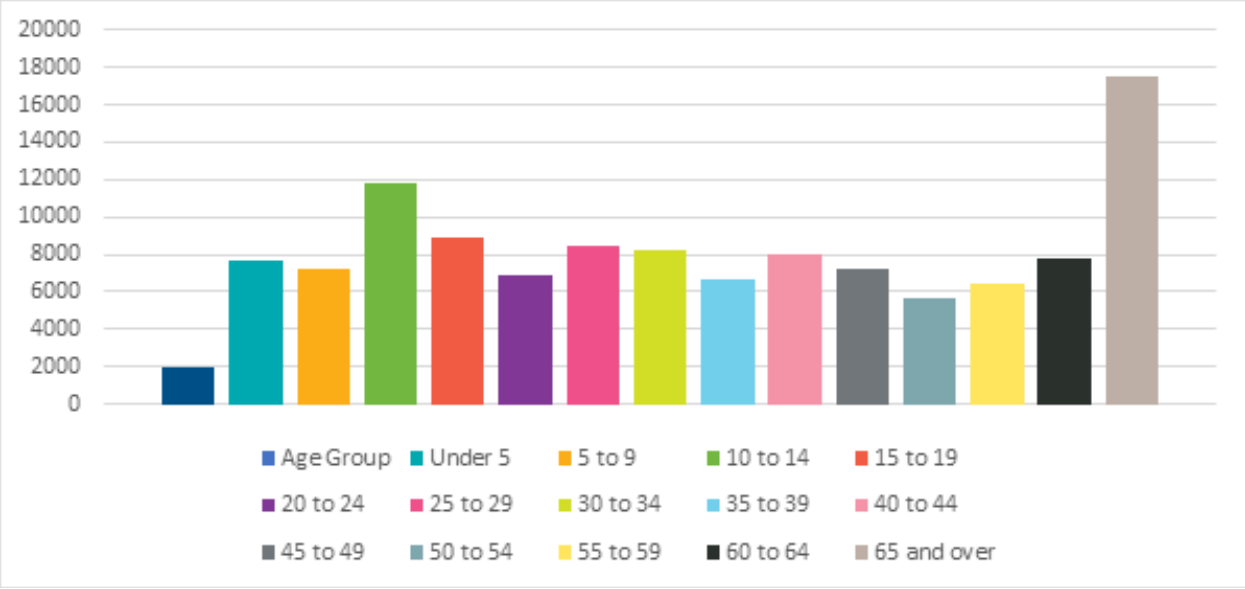
- Population growth in unincorporated areas of Stanislaus County is significantly lower than in incorporated cities, with a mere one percent increase compared to nine percent growth in cities from 2010 to 2020.
- Elderly residents in unincorporated areas make up the largest population group and are aging and staying in place. While young adults aged 20 to 34 represent the second largest age group in unincorporated Stanislaus, there is a decline in the population of children aged nine years old and under, suggesting a potential decrease in families with young children moving into these areas. Figure ES-1 shows the number of residents living in unincorporated Stanislaus County by age group.
- From 2010-2020, unincorporated areas have less racial diversity when compared to the state and saw a decline in White (non-Hispanic), Black or African American, and American Indian and Alaskan Native populations.
- Agriculture is an essential part of the Stanislaus County economy, and it depends on the

labor of farm workers. The State and federal governments use similar categories for defining agricultural industry and the associated employment, which includes employment on farms and ranches and employment related to the manufacturing, transportation, and warehousing of agricultural products. Due to the high percentage of agricultural-related employment in unincorporated Stanislaus County, and the overall cost of housing in the area, there is a need to address housing options for farmworkers, both in agricultural areas and in more developed areas where families may have better access to jobs, services, and schools. The salary of agricultural workers is under the mean income of all occupations ($54,382), emphasizing the need for affordable and attainable housing for these essential workers.

Key housing facts include:

- Stanislaus County (including both unincorporated areas and incorporated cities) lacks sufficient affordable rental housing to meet local needs. Many households are cost-burdened due to stagnant wages and increased housing costs.
- Housing production in unincorporated Stanislaus County has slowed, with over 72 percent of the housing stock being older than 30 years and over 40 percent of the housing stock being older than 50 years.
- The County's current housing stock lacks affordable units for large families. Within the unincorporated areas of Stanislaus County, nearly 10 percent of renter-occupied units are overcrowded versus five percent of owner-occupied units, according to 2020 American Community survey five-year estimates.
- In Stanislaus County, (including both unincorporated areas and incorporated cities) 36 percent of all households had a moderate housing cost burden and 17 percent had a severe housing cost burden. Of the renter households in the County, 25 percent experience severe cost burden.

Figure ES-1: Number of Residents by Age Group



Source: U.S. Census American Community Survey 5-Year Estimates (2022)

Progress In Meeting Previous Goals and Objectives

Stanislaus County's 2015-2023 Housing Element contained policies and programs to preserve and expand the supply of housing at all income levels, and most were successfully achieved by the County. During the last eight years, the County completed the following actions to address local housing needs:

- **Infrastructure:** The County continued working towards an on-going commitment to improving key infrastructure needed to support new housing and to preserve existing housing. The Parklawn Neighborhood and Airport Neighborhood Sewer Projects were completed during the planning period using Community Development Block Grant (CDBG) and State Water Board (SWB) funding. The County has prioritized use of CDBG funding for the West Modesto Sewer Infrastructure Project, which includes the Spencer/Marshall, Beverly/Waverly, and Rouse/Colorado neighborhoods. Sewer Infrastructure in the Spencer/Marshall and Rouse/Colorado neighborhoods are partially constructed, and the County is actively seeking SWB funding to complete construction. The County is also working with City of Modesto to continue development of the design work and to seek SWB funding for the Beverly/Waverly neighborhood. During the planning period there were 160 building permits for sewer connection (septic to sewer) issued throughout the unincorporated area, including: 123 in the Airport Neighborhood, 27 in the Parklawn Neighborhood, nine in the Robertson Road Neighborhood, and one in the Spencer/Marshall Neighborhood.
- **Analysis of Impediments to Fair Housing:** As required by the County's federal funding, a Regional Analysis of Impediments to Fair Housing Choice was adopted on May 12, 2020, as a collaborative document between the Stanislaus Regional Housing Authority (SRHA), Stanislaus Urban County (including the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford), the City of Modesto, and the City of Turlock.. The County will continue to implement the actions identified in this document.
- **Accessory Dwelling Units (ADUs):** During the planning period the County updated its Zoning Ordinance and adjusted its Public Facilities Fees to facilitate the development of ADU's in accordance with state allowance. The County issued building permits permitting 98 ADUs throughout the 2015-2023 planning period. In addition, Stanislaus County partnered with the cities of Ceres, Modesto, Oakdale, Riverbank, Turlock, and Waterford to develop seven different pre-approved construction plans for ADUs. These construction plans range from a one-bedroom, 260-square-foot ADU to a three-bedroom, 1,192-square-foot ADU. Pre-approved ADU construction plans are available to property owners free of charge through the County's website.
- **Housing Rehabilitation:** Over the last eight years, the County continued to offer a housing rehabilitation program in partnership with the SRHA. The County also worked with the SRHA to develop two in-fill housing sites with six single family affordable rental housing units.
- **Housing Stanislaus Initiative:** Housing Stanislaus is a countywide initiative to develop a unified and actionable vision and strategy framework for housing in Stanislaus County. County staff, along with Valley Vision, a non-profit civic leadership consulting firm, developed an outreach and community engagement strategy that aimed to establish a shared understanding of the needs, challenges, and opportunities for housing, and identify and prioritize projects and programs for housing development. Valley Vision conducted surveys and meetings between December of 2021 and July of 2022 with the incorporated cities and a wide range of local stakeholders, subject matter experts and industry professionals.

Progress In Meeting Regional Housing Need

The County projected that the programs outlined in the 2015-2023 Housing Element would result in the production of 2,241 new units, including 883 units affordable to lower-income households. These quantified objectives were consistent with the number of units needed to meet the County's Regional Housing Need Allocation (RHNA). During the 5th cycle, 758 housing units were permitted in the unincorporated areas of the County, including 32 units for lower-income households. Appendix B, Review of Past Accomplishments, provides a programmatic summary of the County's progress, successes, and lessons learned in implementing the 2015-2023 Housing Element.

Summary of Constraints to Housing

State housing element law requires the County to identify and analyze potential and actual governmental and non-governmental constraints to the maintenance, improvement, or development of housing for all income levels, including housing for people with disabilities. The analysis is required to identify specific standards and processes within the purview of government and evaluate their impact on the supply and affordability of housing. Some of the identified constraints present in the County are summarized below. Identified constraints are discussed in Chapter 4, Constraints, and mitigated or removed through policies and programs detailed in Chapter 6, Housing Plan.

Non-Governmental Constraints

- **Housing and Land Costs:** The costs of land, plus the costs of materials and labor to produce housing are high throughout California.
- **Infrastructure Constraints:** Existing infrastructure may not be adequate to accommodate the residential units expected during the planning period and may require planned infrastructure improvements needing to be completed to support future development. Furthermore, the remote nature of many unincorporated communities limits residents job opportunities, transit opportunities, and access to basic services such as grocery stores, making them less suitable for high-density housing development.
- **Environmental Constraints:** Environmental constraints like areas with high wildfire risk, earthquake and landslide hazard zones, flood hazard zones, and excessive noise are potential constraints to housing developments.

Governmental Constraints

- **Emergency Shelter:** Restrictions on the number of beds per shelter (ten bed per zone limits) could be a constraint to the development of adequate shelter capacity. Additionally, requiring more parking than is required to accommodate staff, as stipulated by state law, adds additional project costs and is a constraint to the development of emergency shelters.
- **Single-Family Dwellings:** Single-family dwellings permitted in multiple family zones such as the R-3 zone can be considered a constraint to multifamily development because it results in the overwhelming prevalence of single-family homes in land designated for multifamily uses and that should be reserved for other types of housing.
- **Development Standards:** Land availability with adequate zoning (i.e., for multifamily housing) was identified as a constraint.
- **Parking Standards:** The Zoning Ordinance does not adjust parking requirements based on the size of units in multifamily development. As a result, a three-bedroom unit in a multifamily building has the same parking requirements as a studio and one-bedroom. This places a disproportionate cost on smaller units, contributing to constraints to the development of studios and one-bedroom units.

Adequate Sites to Meet Regional Housing Need

All ten jurisdictions in Stanislaus County (nine cities and one county), are required to have a State certified Housing Element, a plan developed to meet the variety of housing needs of the community over an 8-year planning horizon. The Housing Element is incorporated into each jurisdiction's general plan, which serves as the local government's "blueprint" for how the city and/or county will grow and develop. Housing Elements must evaluate the needs of the community and then incorporate policies that provide opportunities for (and do not unduly constrain) housing development.

A critical part of the Housing Element is the Sites Inventory, which demonstrates that the County has identified enough sites zoned for residential development to meet its RHNA. The RHNA for each region is determined at the State level and then the Regional Council of Governments (COG) determines each jurisdiction's share by income category. While the allocation of the RHNA is handled regionally throughout the State, the land use planning for the actual production of housing is under the purview of the local jurisdiction. While local jurisdictions must plan for the production of housing, showing an adequate land inventory, infrastructure, and policy framework to support housing production, it is the role of the private sector, specifically residential developers, to actually construct housing. The actual production of housing is dependent on market conditions and, in the case of affordable housing, the availability of both private and public funding subsidies.

For the 2023-2031 Housing Element, the State of California identified the need for the Stanislaus Council of Governments (StanCOG) to allocate 34,344 units amount the ten local jurisdictions, as shown in Table ES-1. Unincorporated Stanislaus County's share of the 2023-2031 RHNA is 2,475 units. The methodology used by StanCOG to distribute the Regional Housing Needs Allocation (RHNA) between the nine incorporated cities and unincorporated county placed a low weight on the "Promoting Infill, Equity, and Environment" objective. Utilizing a high weight in this objective

Table ES-1: StanCOG 6th Cycle Regional Housing Needs Allocation

Jurisdiction	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
Ceres	706	489	661	1,505	3,361
Hughson	284	196	122	279	881
Modesto	2,807	1,943	1,981	4,517	11,248
Newman	197	136	218	497	1,048
Oakdale	414	286	294	671	1,665
Patterson	1,046	724	593	1,353	3,716
Riverbank	970	672	594	1,355	3,591
Turlock	1,305	903	1,096	2,498	5,802
Waterford	107	74	115	261	557
Unincorporated County	574	398	458	1,045	2,475
Total	**8,410**	**5,821**	**6,132**	**13,981**	**34,344**

would have increased the RHNA allocation for cities such as Modesto and Turlock, who are located in proximity to transit and have lower Vehicle Miles Traveled (VMT) and would have lowered the RHNA allocation for the unincorporated County, providing an emphasize on the conservation of agricultural lands. The County, anticipating use of its existing infill opportunities accepted the lower weighted objective, placing a higher housing obligation on the unincorporated County. An analysis of how the County accommodates its RHNA can be found in Chapter 5, Housing Resources.

The Sites Inventory consists of the following strategies the County utilizes to meet its RHNA obligation:

- Entitled developments that will be ready for occupancy during the planning period;
- Accessory dwelling units (ADUs) assumed to be built during the planning period; and
- Sites suitable for residential development, including sites proposed to be rezoned.

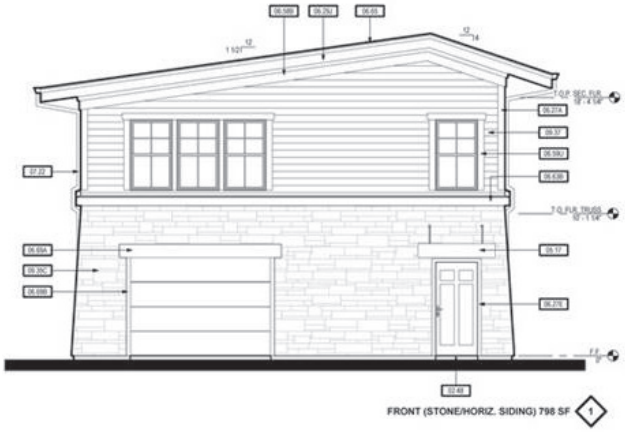
Entitled Developments

The County identified 252 units in ten projects that are currently in the development pipeline and expected to be completed during the 2023-2031 planning period. All of these projects are expected to be affordable to above-moderate households. A full list of these projects is detailed in Chapter 5, Housing Resources.

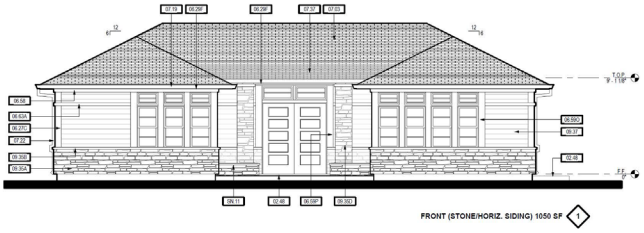
Accessory Dwelling Units

The number of ADUs and junior accessory dwelling units (JADUs) built in the County has increased since 2016 legislation that reduced regulatory barriers to the development of these units. The County approved an average of 23 ADU permits per year between 2019 and 2021. Given this average, the Housing Element anticipates 184 ADUs will be permitted over the next eight years.

562 square foot ADU footprint



798 square foot ADU footprint



1,050 square foot ADU footprint

Construction of Keyes 19 homes

Sites Suitable for Housing

The Housing Site Inventory lists vacant and underutilized sites and estimates the realistic capacity of each site, based on an analysis of local development trends. The County's housing element utilizes its existing land use and zoning framework (designations and ordinances) to support an adequate land inventory to support 940 units, approximately 46 percent of the required 2,475 units. These 940 units could develop today through the issuance of a building permit utilizing existing zoning and development standards.

After accounting for ADU's, entitled projects, and sites with existing land use and zoning framework, the County maintains a deficit of 1,100 units to accommodate its RHNA. To fill this deficit, the County identified 48 sites to rezone to higher density as a part of the Housing Element Update. These rezoned sites would yield an additional 1,469 units. Rezone sites are summarized by community in Table ES-2. A detailed analysis of rezone sites is located in Chapter 5, Housing Resources.

Table ES-2: Rezone Sites by Community

	Number of Parcels	Acreage	Lower- Income	Moderate-Income	Above Moderate- Income	Total
Denair	4	12.41	127	13	0	140
Empire	5	4.77	17	46	8	71
Keyes	3	4.45	58	18	2	78
North Ceres	4	7.97	97	18	1	116
Salida	3	1.40	0	18	3	21
South Ceres	1	4.18	76	7	0	83
South Modesto - Bret Hart	10	29.67	481	101	8	590
West Modesto	18	23.44	248	107	15	370
Total	**48**	**88.29**	**1,104**	**328**	**37**	**1,469**

Affirmatively Furthering Fair Housing

Affirmatively Furthering Fair Housing (AFFH) means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." In the context of a community's housing needs, AFFH is not just about the number of housing units needed, but also about where the units are located and who has access to them. Core elements include analyses of segregation, integration, disparities in access to opportunity, and disproportionate housing needs. A detailed analysis of fair housing in Stanislaus County is located in Chapter 3, AFFH.

The County of Stanislaus will implement programs and policies to ensure they are making significant strides in affirmatively further fair housing. These programs and policies will address fair housing issues by:

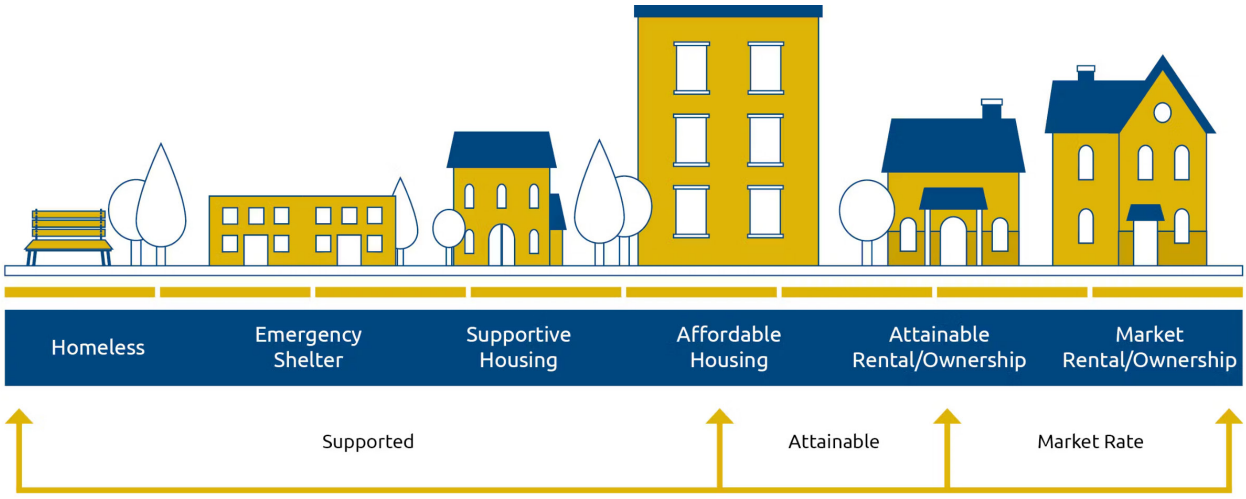
- Ensuring housing programs cater to a diverse community including multi-generational families and limited English proficiency households.
- Collaborating with community groups like faith-based and nonprofit organizations for outreach on housing resources.

- Providing training on Diversity, Equity, and Inclusion (DEI) topics to County staff.
- Pursuing grant funding for conceptual land use plans to redevelop existing communities.
- Adjusting funding policies to allow the use of eligible State and/or Federal funding to repair failing septic systems.
- Giving preference to lending institutions with an "Outstanding" Community Reinvestment Act (CRA) rating.
- Aiming for recognition as a Prohousing jurisdiction during the 2023-2031 Housing Element planning period.
- Exploring allowing various home-based economic opportunities in residential neighborhoods such as micro-kitchens, daycares, and home occupations.
- Expanding housing opportunity and accessibility for farmworkers.

Local fair housing issues include economic factors, racial and income segregation, and disparities in access to areas with high quality economic, environmental, and educational characteristics. Based on analysis of data, public input, and local knowledge, the County identified and prioritized factors that contribute to local fair housing issues ("contributing factors") and outlined strategies to address those factors in of the Housing Element. These contributing factors are:

- Need for additional public and private investments in low resource neighborhoods
- Low supply of affordable housing
- Location and type of affordable housing and land use and zoning laws
- Special needs housing
- Housing for persons experiencing homelessness
- Fair housing resources
- Access to transit
- NIMBYism and public perception of housing development
- Access to financial services
- Neighborhoods vulnerable to displacement

Meaningful actions intended to address these contributing factors are detailed in Chapter 6, Housing Plan.



Housing Types and Markets

2023-2031 Housing Plan

The updated Housing Plan is an important part of the Housing Element and forms the housing policy roadmap for unincorporated Stanislaus County. It integrates data, trends, community opinions, and public input. The Housing Strategy keeps many of the same goals, policies, and programs that were successful in the last Housing Element, with new policies and programs proposed to meet changing needs and new legal requirements. Most ongoing policies and programs were highly successful and are continued in the Housing Element update. Limited-term programs that were accomplished have been removed; the updated Housing Element includes 26 programs to ensure the policies are effective. Chapter 6, Housing Plan, details the goals, policies, and programs that will be implemented through this Housing Element Update. A brief summary of the proposed goals and policies is listed below:

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

Policies

1A. Support Safe and Livable Housing. The County shall support code enforcement efforts in responding to complaints and ensuring that existing housing meets adopted code requirements that set forth acceptable health and safety standards for residential units, as the County is required to enforce existing housing and building codes.

1B. Support the Preservation of Existing Single-Family Housing Occupied by Lower-income Households. The County shall preserve the existing single-family housing stock occupied by lower-income households by providing rehabilitation assistance for single-family, owner-occupied units, including manufactured homes and mobile homes.

1C. Provide Residential Rehabilitation Opportunities. The County will partner with public and private agencies to provide funding support for residential rehabilitation programs to improve housing quality and conditions, ensuring the safety, habitability, and enhanced living standards for lower-income households.

1D. Preserve At-Risk Units and Naturally Occurring Affordable Housing. The County will seek to avoid the loss of publicly assisted affordable housing units and/or housing units occupied by lower-income households and the resulting displacement of low-income residents by providing funds, as available, to nonprofit developers to be used for the acquisition of subsidized housing developments at risk of converting to market rate units.

1E. Code Compliance. The County shall continue to encourage the rehabilitation of substandard residential properties by homeowners and landlords by responding to citizen complaints regarding potential code violations and referring residents to appropriate resources, as the County is required to enforce existing housing and building codes.

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

Policies

2A. Homeownership Housing. The County shall encourage the development of ownership housing and assist tenants to become homeowners to increase owner-occupancy rate within the parameters of federal and state housing laws.

2B. Provide Incentives for Affordable Housing. The County shall promote the use of density bonuses and waive or reduce park, transportation, and other impact fees to facilitate the development of new housing for extremely low-, very low-, and low-income households.

2C. Integration of Affordable Housing. The County shall encourage a mix of affordability levels in residential projects and encourage the dispersal of such units to achieve greater integration of affordable housing throughout the community.

2D. Create Access to Capital. The County shall support efforts to create access to capital needed to increase housing development and improve housing affordability in Stanislaus County. The County shall identify new funding sources and strategies to support affordable housing.

2E. Regional Housing Needs Allocation (RHNA). The County will support future StanCOG Regional Housing Need Allocation efforts that equitably recognize the County's contribution to housing developments within city limits through the reduction in County Impact Fees for affordable housing development and for partnerships to develop affordable housing using County funds within the incorporated cities.

2F. RHNA Transfer. The County shall seek to negotiate agreements with any city proposing to annex land utilized by the County to meet its RHNA obligations to transfer a share of the StanCOG RHNA from the unincorporated area to the annexing city.

Goal 3: Increase housing production by providing adequate sites for a variety of housing types and removing constraints to residential development.

Policies

3A. Diversity of Housing Types. The County shall continue to implement land use policies and investigate amended policies that allow for a range of residential densities and housing types, prices, ownership, and size, including low-density single family uses, moderate-density townhomes, and higher-density apartments, condominiums, transit-oriented developments, live-work units, Accessory Dwelling Units (ADUs), and units in mixed-use developments.

3B. Provide and Maintain Adequate Sites to Accommodate the RHNA. The County shall maintain appropriate land use designations and densities to accommodate an increased supply of housing units by type, cost, and size to meet its share of the regional housing need in alignment with countywide housing priorities.

3C. No Net Loss Zoning. The County shall make findings related to the potential impact on the County's ability to meet its share of the regional housing need when approving discretionary entitlements to rezone residentially designated properties or develop a residential project with fewer units or at a higher income than what is assumed for the site in the Housing Element Sites Inventory, consistent with zoning requirements in Government Code Section 65863.

3D. Streamline Housing Entitlement and Permitting Process. The County shall streamline the housing approval and permitting process, particularly for affordable housing, throughout County departments.

3E. Clear Development Standards and Approval Procedures. The County shall create and administer clear objective development standards and approval procedures for a variety of housing types, including, but not limited to, multifamily housing and emergency shelters.

3F. Facilitate Infill Development. The County shall utilize infill development strategies to further develop and improve existing neighborhoods with the infrastructure to serve new development.

3G. Facilitate Strategic Development on Large Lots. The County shall support and facilitate strategic development on large lots to promote cohesive and connected development that provides housing for a variety of household incomes and types.

3H. Residential Uses Close to Services. The County shall encourage development of residential uses close to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.

3I. Compatible Development of Underutilized Sites. The County shall encourage compatible residential development in areas with underutilized non-agricultural lands.

3J. Flexible Standards and Regulations. The County shall allow flexibility within the County's standards and regulations to encourage a variety of housing types.

3K. Adaptive Reuse. The County shall support innovative strategies for the adaptive reuse of residential, commercial, and industrial buildings to provide for a variety of housing types and residential uses.

3L. Residential Sites Inventory. Maintain a vacant and underutilized residential sites inventory and assist residential developers in identifying land suitable for residential development.

3M. Preserve Multifamily Land Use. Preserve the existing supply of land that allows multi-family dwellings and discourage development on such land at lower residential densities or with solely nonresidential land uses.

3N. Infrastructure Development. The County shall continue to utilize its HUD CDBG funding allocation, and seek new funding, for infrastructure needed to upgrade existing areas as a means of preserving existing housing units and to accommodate new housing uses.

3O. Development within Cities. The County will continue to work with cities to leverage available funding for the development of affordable housing projects throughout Stanislaus County.

3P. Public Facility Fee Waivers. The County shall continue to waive Public Facilities Fees for qualified affordable housing projects to be developed throughout Stanislaus County.

Goal 4: Provide housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, and persons with disabilities.

Policies

4A. Address Special Housing Needs. The County shall address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, and supportive housing.

4B. Housing and Supportive Services. The County shall promote housing and supportive services for households with special needs including seniors, persons with disabilities, single parents, and individuals experiencing homelessness.

4C. Reasonable Accommodation. The County shall continue to implement a reasonable accommodation process for persons with disabilities to request exceptions or modifications of zoning, permit processing, and building regulations to ensure housing is accessible.

4D. Support Stanislaus Community System of Care (the local Continuum of Care). The County shall support the local Continuum of Care in its efforts to meet the needs of homeless families and individuals.

4E. Support Organizations Serving the Homeless Community. The County shall support the efforts of non-profit and community organizations that provide emergency shelter and other assistance for the homeless population, including alcohol and drug recovery programs.

4F.Range of Housing for Seniors. The County shall facilitate and encourage the development of a range of housing types for seniors from which support services are readily accessible.

4G. Family Housing. The County shall encourage the development of housing that provides for families with children (such as larger rental and ownership units for lower- and moderate-income families) and the provision of services such as childcare and after-school care when feasible.

4H. Universal Design Standards. The County shall implement universal design standards or guidelines that promote accessibility for everyone regardless of age or physical ability.

Goal 5: Ensure fair and equal housing opportunities.

Policies

5A. Fair Housing Services. The County shall support services and programs that work to eliminate housing discrimination and ensure that residents are aware of their rights and responsibilities regarding fair housing.

5B. Housing Discrimination. The County shall support efforts within its control to prevent discrimination in the sale or rental of housing with regard to race, ethnic background, religion, disability, income, sex, age, and household composition.

5C. Fair Housing Outreach. The County shall continue to conduct fair housing outreach and education for unincorporated residents, property owners, and housing providers to ensure each understands their rights and responsibilities.

5D. Rental Assistance. The County shall continue to support rental assistance for lower-income households who have fallen behind on rent and need assistance on regaining or gaining housing stability.

5E. Fair Chance Housing. The County shall refer individuals with poor credit history, poor landlord referral/ references, formerly incarcerated, or other mitigating circumstances to service providers who can assist them with housing opportunities.

Housing at Keyes 19

Draft 2023-2031 Housing Element Update

Draft 2023-2031 Housing Element

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Table of Contents

1 Introduction 1-1
1.1 Purpose of Housing Element 1-1
1.2 Relationship to Other General Plan Elements 1-1
1.2.1 Organization of the Housing Element 1-2
1.3 Data Sources and Methods 1-3
1.4 Community Profile 1-3
1.4.1 History of Stanislaus County 1-4
1.5 Regional Housing Requirements 1-8
1.6 Public Participation 1-9
1.6.1 Project Website 1-9
1.6.2 Community Workshops 1-10
1.6.3 Housing Element Presentations 1-11
1.6.4 Stakeholder Interviews 1-11
1.6.5 Public Comment Survey 1-13
1.6.6 Participatory Map Activity 1-14
1.6.7 Municipal Advisory Council Meetings 1-14
1.6.8 Housing Stanislaus Initiative 1-15
1.7 Public Review 1-15
2 Housing Needs Assessment 2-1
2.1 Population Trends 2-1
2.1.1 Population Growth 2-1
2.1.2 Age Characteristics 2-2
2.1.3 Race Characteristics 2-3
2.2 Economic Trends 2-5
2.2.1 Employment 2-5
2.3 Household Characteristics 2-8
2.4 Housing Stock 2-11
2.5 Special Groups 2-20
2.5.1 Elderly Persons (Senior Households) 2-21
2.5.2 Farmworkers 2-23
2.5.3 Persons with Disabilities (including Developmental Disabilities) 2-25
2.5.4 Large Families 2-27
2.5.5 Female-Headed Households 2-28
2.5.6 Extremely Low-Income Households 2-29
2.5.7 Homelessness 2-31
2.6 Affordable Housing at Risk of Conversion 2-33

3 Affirmatively Furthering Fair Housing 3-1
3.1 Local Analysis 3-1
3.2 Regional Analysis 3-7
3.3 Fair Housing Methodology 3-7
3.3.1 Data Sources 3-7
3.4 Fair Housing Resources 3-11
3.4.1 Enforcement and Outreach Capacity 3-11
3.4.2 Compliance with Fair Housing Laws 3-13
3.4.3 Ability to Address Complaints 3-14
3.4.4 Findings, Lawsuits, Enforcement Actions, Settlements or Judgments 3-15
3.5 Segregation and Integration Patterns and Trends 3-17
3.6 Race and Ethnicity 3-18
3.7 Persons with Disabilities 3-28
3.8 Familial Status 3-32
3.9 Household Income 3-37
3.9.1 Racially and Ethnically Concentrated Areas of Poverty 3-43
3.9.2 Poverty 3-43
3.9.3 Concentrated Areas of Affluence 3-53
3.10 Location of Affordable Housing 3-58
3.11 Disparities in Access to Opportunities 3-60
3.11.1 HCD/TCAC Opportunity Areas 3-60
3.11.2 Opportunity Areas by Indicator 3-63
3.11.3 Access to Transportation and Location Affordability Index 3-81
3.12 Disproportionate Housing Needs 3-86
3.12.1 Overpayment 3-86
3.12.2 Overcrowding 3-92
3.12.3 Housing Problems 3-93
3.12.4 Displacement 3-100
3.12.5 Homelessness 3-105
3.13 Local Knowledge 3-110
3.13.1 Historic Patterns of Segregation 3-110
3.13.2 Development Patterns within the Unincorporated County 3-112
3.13.3 Existing County Efforts 3-113
3.14 Community Input 3-115
3.14.1 Community Workshops 3-115
3.14.2 Stakeholder Interviews 3-116
3.14.3 General Plan and Housing Element Update Survey 3-118
3.14.4 Additional Outreach 3-119

3.15 Other Relevant Factors 3-121
3.15.1 Language Barriers 3-121
3.15.2 Access to Homeownership 3-121
3.15.3 Lack of Services and Infrastructure in Rural, Lower-Income Communities 3-122
3.15.4 Prevalence of Low Resource Areas 3-124
3.15.5 Measure E and Measure X 3-124
3.15.6 Housing Choice Vouchers 3-125
3.16 Sites Inventory 3-127
3.16.1 Opportunity Areas 3-127
3.16.2 Improved Conditions 3-144
3.16.3 Exacerbated Conditions 3-145
3.16.4 Unincorporated County Neighborhoods (Pockets/Islands) and County Communities 3-145
3.16.5 Racially and Ethnically Concentrated Areas of Poverty and Racially Concentrated Areas of Affluence 3-162
3.16.6 Access to Opportunity 3-164
3.16.7 Disproportionate Housing Needs 3-164
3.16.8 Subsidized Housing 3-165
3.17 Identification and Prioritization of Contributing Factors 3-165
4 Housing Constraints 4-1
4.1 Governmental Constraints 4-1
4.1.1 General Plan and Zoning Ordinance 4-1
4.1.2 Zoning Ordinance 4-5
4.1.3 Zoning for a Variety of Housing Types 4-6
4.1.4 Development Standards 4-14
4.1.5 Processing Time and Permit Procedures 4-18
4.1.6 Fees 4-23
4.1.7 Review of Local Ordinances 4-29
4.1.8 Building Codes and Enforcement 4-29
4.1.9 On- and Off-Site Improvements 4-30
4.1.10 Growth Management 4-33
4.1.11 Development, Maintenance, and Improvement of Housing for Persons with Disabilities 4-35
4.1.12 State Streamlining 4-37
4.1.13 Transparency in the Development Process 4-38
4.2 Non-Governmental Constraints 4-38
4.2.1 Construction Cost 4-39
4.2.2 Land Cost 4-39
4.2.3 Availability of Financing 4-40
4.2.4 Requests for Lower Development Densities 4-45

4.3 Infrastructure Constraints 4-45
4.4 Environmental Constraints 4-46
4.4.1 Federal and State Environmental Protection Regulations 4-47
4.4.2 Geologic and Seismic Hazards 4-47
4.4.3 Wildfire 4-48
4.4.4 Flood Risk 4-48
4.4.5 Excessive Noise 4-49
5 Housing Resources 5-1
5.1 Regional Housing Needs Assessment Requirement 5-1
5.2 Fulfilling the RHNA Obligation 5-2
5.2.1 Planned or Approved Units 5-2
5.2.2 Accessory Dwelling Units (ADU) 5-7
5.2.3 Remaining Share of RHNA 5-7
5.2.4 Capacity of Identified Residential Sites Under Current Zoning 5-8
5.2.5 Rezoning to Accommodate a Shortfall of Residential Capacity 5-11
5.3 Adequacy of the Sites Inventory 5-12
5.4 Sites Inventory by Community 5-13
5.4.1 Airport 5-13
5.4.2 Bret Harte 5-16
5.4.3 Crows Landing 5-20
5.4.4 Del Rio 5-23
5.4.5 Denair 5-27
5.4.6 Diablo Grande 5-30
5.4.7 Empire 5-36
5.4.8 Grayson 5-39
5.4.9 Hickman 5-42
5.4.10 Keyes 5-45
5.4.11 North Ceres 5-48
5.4.12 East Oakdale 5-52
5.4.13 Salida 5-56
5.4.14 South Ceres (Laurel/Central) 5-59
5.4.15 Turlock (Kenwood/Star) 5-62
5.4.16 Valley Home 5-65
5.4.17 West Modesto 5-68
5.5 Sites Inventory Methodology and Justification 5-73
5.5.1 Suitable Sites for Affordable Housing 5-73
5.5.2 Non-vacant Sites 5-74
5.5.3 Suitability of Publicly Owned Sites 5-86

5.6 Availability of Infrastructure and Services 5-87
5.6.1 Sanitary Districts 5-89
5.6.2 Community Service Districts 5-89
5.7 Environmental Constraints 5-90
5.7.1 Wildfire 5-90
5.7.2 Drought 5-91
5.7.3 Flood 5-91
5.7.4 Williamson Act 5-91
5.7.5 Environmental Hazards and Toxic Releases 5-91
5.8 Financial Resources for Affordable Housing 5-92
5.8.1 Existing Financial Resources 5-92
5.8.2 Potential Financial Resources 5-93
5.9 Administrative Resources 5-94
5.9.1 County of Stanislaus 5-94
5.9.2 San Joaquin Valley Regional Planning Agencies Policy Council 5-95
5.9.3 Non-Profit Organizations 5-95
5.10 Opportunities for Energy Conservation 5-95
6 Housing Plan 6-1
6.1 Summary of Quantified Objectives 6-35

Tables

Table 1-1 Unincorporated Stanislaus County 2023-2031 Housing Target (RHNA) 1-9
Table 2-1 Historic Population in Stanislaus County (1970-2020) 2-2
Table 2-2 Population Growth in Stanislaus County (2010-2020) 2-2
Table 2-3 Age Characteristics in Unincorporated Stanislaus 2-3
Table 2-4 Race and Ethnicity in Unincorporated Stanislaus 2-4
Table 2-5 2019 Undocumented Immigration Population in Stanislaus County 2-5
Table 2-6 Major Employers in Stanislaus County 2-6
Table 2-7 Occupation of Stanislaus County Residents 2-6
Table 2-8 Mean Salary by Occupation – Stanislaus County 2-7
Table 2-9 Household Characteristics for 2010 and 2020 2-10
Table 2-10 Unincorporated Stanislaus County Housing Unit Type 2-11
Table 2-11 Stanislaus County Housing Production 2-12
Table 2-12 Unincorporated Stanislaus County Substandard Units 2-12
Table 2-13 Code Enforcement Cases 2-13
Table 2-14 Unincorporated Stanislaus Vacancy Rates 2-14
Table 2-15 Unincorporated Stanislaus County, Number of Bedrooms by Tenure 2-15
Table 2-16 Unincorporated Stanislaus County, Overcrowded Housing Conditions 2-15
Table 2-17 Fair Market Rent in Stanislaus County (2022) 2-16

Table 2-18 Median Sales Price of Homes in Stanislaus County (December 2022) 2-17
Table 2-19 Median Rent Values in Stanislaus County (2020) 2-17
Table 2-20 Affordable Housing Costs by Income Category, Stanislaus County (2022) 2-18
Table 2-21 CHAS Table ACS Housing Cost Burden by Household Income Classification (Stanislaus County) 2-19
Table 2-22 CHAS Table ACS Housing Cost Burden by Household Income Classification (Stanislaus County) 2-20
Table 2-23 Special Needs Groups in Unincorporated Stanislaus County 2-20
Table 2-24 Senior Population Compared to the State 2-21
Table 2-25 Seniors by Tenure 2-22
Table 2-26 Farmworkers in Stanislaus County 2-24
Table 2-27 Farmworker Employment by Workers 2-24
Table 2-28 Disability by Type in Stanislaus County 2-26
Table 2-29 Unincorporated Stanislaus Household Size by Tenure 2-27
Table 2-30 Unincorporated Stanislaus Female Headed Households and Poverty Level 2-28
Table 2-31 Extremely Low-Income Households by Tenure 2-30
Table 2-32 Extremely Low-Income Households Overpaying by Tenure 2-30
Table 2-33 Homelessness in Stanislaus County 2-32
Table 3-1 Census-Designated Places in Stanislaus County 3-2
Table 3-2 Fair Housing Organizations Active in Stanislaus County 3-13
Table 3-3 Racial/Ethnic by Census Designated Place 3-18
Table 3-4 Racial/Ethnic Dissimilarity Trends in Stanislaus County 3-20
Table 3-5 Disability in Stanislaus County 3-28
Table 3-6 Household Type and Presence of Children, Stanislaus County 3-33
Table 3-7 Large Households 3-33
Table 3-8 Median Household Income by Census Designated Place 3-37
Table 3-9 Median Income by Household Type 3-38
Table 3-10 Income and Poverty 3-45
Table 3-11 Poverty by Female-Headed Households 3-46
Table 3-12 Poverty Rate by Census Designated Place 3-46
Table 3-13 Median Household Income by Race or Hispanic Origin 3-53
Table 3-14 Overpaying Households 3-87
Table 3-15 Cost Burdened Households by Income Category (Renters and Owners) 3-87
Table 3-16 Overcrowded Households 3-92
Table 3-17 Overcrowded Households by Race/Ethnicity, Stanislaus County 3-93
Table 3-18 Homelessness by Race, Stanislaus County 3-106
Table 3-19 Emergency Shelters in Stanislaus County 3-106
Table 3-20 Sites Inventory by Census Tract Characteristics 3-128
Table 3-21 AFFH Programs by Category 3-167

Table 4-1 Land Use Designations Permitting Residential Uses 4-2
Table 4-2 Salida Community Plan Land Use Designations Permitting Residential Uses 4-4
Table 4-3 Residential Zone Districts 4-6
Table 4-4 Housing Types Permitted by Zone 4-7
Table 4-5 Setback, Lot Coverage, and Height Requirements in Residential Zone Districts 4-14
Table 4-6 Parking Requirements by Residential Use Type 4-18
Table 4-7 Application Processing Time 4-19
Table 4-8 Stanislaus County Planning and Processing Fees 4-23
Table 4-9 Stanislaus County Development Impact Fees 4-26
Table 4-10 Stanislaus County Public Facilities Fee Summary – Unincorporated 4-26
Table 4-11 Stanislaus County School District Fees 4-27
Table 4-12 Stanislaus County Fire District Fees 4-27
Table 4-13 Residential Development Fees 4-28
Table 4-14 Loan Outcomes by Applicant Income Level in Stanislaus County 4-43
Table 4-15 Loan Outcomes by Applicant Race and Ethnicity 4-44
Table 4-16 Requests for Lower Development Densities During the 5th Cycle 4-45
Table 5-1 Unincorporated Stanislaus County Housing Needs for 2023-2031 5-2
Table 5-2 Planned and Approved Projects 5-4
Table 5-3 Remaining Share of RHNA 5-7
Table 5-4 Typical Densities of Residential Projects in Stanislaus County 5-9
Table 5-5 Sites Inventory Density Assumptions by Zone 5-10
Table 5-6 Realistic Capacity of Sites with Current Zoning 5-11
Table 5-7 Realistic Capacity of Rezoned Sites 5-12
Table 5-8 Adequacy of Residential Sites Inventory 5-12
Table 5-9 Summary of Residential Capacity in Airport 5-13
Table 5-10 Residential Sites in Airport 5-14
Table 5-11 Residential Capacity in Bret Harte 5-16
Table 5-12 Residential Sites in Bret Harte 5-17
Table 5-13 Residential Capacity in Crow's Landing 5-20
Table 5-14 Residential Sites in Crows Landing 5-21
Table 5-15 Residential Capacity in Del Rio 5-23
Table 5-16 Residential Sites in Del Rio 5-24
Table 5-17 Residential Capacity in Denair 5-27
Table 5-18 Residential Sites in Denair 5-28
Table 5-19 Residential Capacity in Diablo Grande 5-30
Table 5-20 Residential Sites in Diablo Grande 5-31
Table 5-21 Residential Capacity in Empire 5-36
Table 5-22 Residential Sites in Empire 5-37

Table 5-23 Residential Capacity in Grayson 5-39
Table 5-24 Residential Sites in Grayson 5-40
Table 5-25 Residential Capacity in Hickman 5-42
Table 5-26 Residential Sites in Hickman 5-43
Table 5-27 Residential Capacity in Keyes 5-45
Table 5-28 Residential Sites in Keyes 5-46
Table 5-29 Residential Capacity in North Ceres 5-48
Table 5-30 Residential Sites in North Ceres 5-49
Table 5-31 Residential Capacity in East Oakdale 5-52
Table 5-32 Residential Sites in East Oakdale 5-53
Table 5-33 Residential Capacity in Salida 5-56
Table 5-34 Residential Sites in Salida 5-57
Table 5-35 Residential Capacity in South Ceres (Laurel/Central) 5-59
Table 5-36 Residential Sites in South Ceres 5-60
Table 5-37 Residential Capacity in Turlock 5-62
Table 5-38 Residential Sites in Turlock (Kenwood/Star) 5-63
Table 5-39 Residential Capacity in Valley Home 5-65
Table 5-40 Residential Sites in Valley Home 5-66
Table 5-41 Residential Capacity in West Modesto 5-68
Table 5-42 Residential Sites in West Modesto 5-69
Table 5-43 Redevelopment Trends of Non-Vacant Sites 5-75
Table 5-44 Single Family with Extra Land Representative Sites 5-78
Table 5-45 Multifamily and Mobile Home Park with Extra Land 5-82
Table 5-46 Underutilized Commercial/Mixed-Use Representative Sites 5-83
Table 5-47 Existing Uses of Inventory Sites 5-84
Table 5-48 Nonvacant Sites Analysis Summary 5-84
Table 5-49 Publicly Owned Sites 5-87
Table 5-50 Availability of Infrastructure 5-88
Table 6-1 Quantified Housing Objectives (2023-2031) 6-36

Figures

Figure 1-1 Number of Housing Structures Built in Stanislaus County by Decade 1-7
Figure 2-1 Median Home Values (2022) 2-16
Figure 3-1 Stanislaus County Cities and CDPs 3-3
Figure 3-2 South Modesto Area 3-4
Figure 3-3 West Modesto Area 3-5
Figure 3-4 North Ceres Area 3-6
Figure 3-5 Northern San Joaquin Valley Region 3-8
Figure 3-6 FHEO Inquiries in Stanislaus County by City, 2013-2021 3-16

Figure 3-7 Percent of Total Non-White Population in 2010 by Block Group, Stanislaus County 3-21
Figure 3-8 Percent of Total Non-White Population in 2018 by Block Group, Stanislaus County 3-22
Figure 3-9 2018 White Majority Tracts, Stanislaus County 3-23
Figure 3-10 2018 Hispanic Majority Tracts, Stanislaus County 3-24
Figure 3-11 Racial Segregation and Integration, Stanislaus County 3-25
Figure 3-12 Percentage of 2018 Population that is Non-White by Block Group, Region 3-26
Figure 3-13 Racial Segregation and Integration, Region 3-27
Figure 3-14 Population with a Disability by Census Tract, Stanislaus County 3-30
Figure 3-15 Population with a Disability by Census Tract, Region 3-31
Figure 3-16 Children in Married-Couple Households by Census Tract, Stanislaus County 3-34
Figure 3-17 Children in Female-Headed Households, No Spouse/Partner Present by Census Tract, Stanislaus County 3-35
Figure 3-18 Children in Female-Headed Households, No Spouse/Partner Present, Region 3-36
Figure 3-19 Median Household Income by Block Group, Stanislaus County 3-40
Figure 3-20 Percent Low to Moderate Income Population by Block Group, Stanislaus County 3-41
Figure 3-21 Percent Low to Moderate Income Population by Block Group, Region 3-42
Figure 3-22 Poverty Status by Tract, Stanislaus County 3-48
Figure 3-23 R/ECAPs in Stanislaus County 3-49
Figure 3-24 Areas of High Segregation and Poverty in Stanislaus County 3-50
Figure 3-25 Poverty Status by Census Tract, Region 3-51
Figure 3-26 R/ECAPs, Region 3-52
Figure 3-27 Racially Concentrated Areas of Affluence, Stanislaus County 3-56
Figure 3-28 Racially Concentrated Areas of Affluence, Region 3-57
Figure 3-29 Location of Publicly Supported Affordable Housing in Stanislaus County 3-59
Figure 3-30 HCD/TCAC Opportunity Areas by Census Tract, Stanislaus County 3-61
Figure 3-31 HCD/TCAC Opportunity Areas, Region 3-62
Figure 3-32 TCAC Opportunity Areas – Economic, Stanislaus County 3-65
Figure 3-33 Jobs Proximity Index by Block Group, Stanislaus County 3-66
Figure 3-34 TCAC Opportunity Areas – Economic Score by Census Tract, Region 3-67
Figure 3-35 Jobs Proximity Index, Region 3-68
Figure 3-36 TCAC Opportunity Area – Education Score, Stanislaus County 3-70
Figure 3-37 TCAC Opportunity Area – Education Score by Census Tract, Region 3-71
Figure 3-38 TCAC Opportunity Area – Environmental Score, Stanislaus County 3-76
Figure 3-39 CalEnviroScreen 4.0 Percentile Scores, Stanislaus County 3-77
Figure 3-40 SB 535 Disadvantaged Communities, Stanislaus County 3-78
Figure 3-41 TCAC Opportunity Area – Environmental Score by Census Tract, Region 3-79
Figure 3-42 CalEnviroScreen 4.0 Percentile Scores, Region 3-80

Figure 3-43 High Quality Transit Stops, Stanislaus County 3-83
Figure 3-44 Location Affordability Index (HUD), Stanislaus County 3-84
Figure 3-45 Location Affordability Index (HUD), Region 3-85
Figure 3-46 Overypayment by Renters, Stanislaus County 3-88
Figure 3-47 Overpayment by Home Owners, Stanislaus County 3-89
Figure 3-48 Overypayment by Renters, Region 3-90
Figure 3-49 Overpayment by Home Owners, Region 3-91
Figure 3-50 Overcrowded Households, Stanislaus County 3-95
Figure 3-51 Percent of Households with Severe Housing Problems, Stanislaus County 3-96
Figure 3-52 Overcrowded Households, Region 3-97
Figure 3-53 Severely Overcrowded Households, Region 3-98
Figure 3-54 Percent of Households with Severe Housing Problems, Region 3-99
Figure 3-55 Sensitive Communities, Stanislaus County 3-102
Figure 3-56 Estimated Displacement Risk, Stanislaus County 3-103
Figure 3-57 Estimated Displacement Risk, Region 3-104
Figure 3-58 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Stanislaus County 3-108
Figure 3-59 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Region 3-109
Figure 3-60 Housing Choice Vouchers, Stanislaus County 3-126
Figure 3-61 Sites Inventory, Airport, TCAC Opportunity Areas 3-130
Figure 3-62 Sites Inventory, Bret Harte, TCAC Opportunity Areas 3-131
Figure 3-63 Sites Inventory, Crows Landing, TCAC Opportunity Areas 3-132
Figure 3-64 Sites Inventory, Del Rio, TCAC Opportunity Areas 3-133
Figure 3-65 Sites Inventory, Denair, TCAC Opportunity Areas 3-134
Figure 3-66 Diablo Grande Sites Inventory, TCAC Opportunity Areas 3-135
Figure 3-67 Grayson Sites Inventory, TCAC Opportunity Areas 3-136
Figure 3-68 Sites Inventory, Hickman, TCAC Opportunity Areas 3-137
Figure 3-69 Sites Inventory, Keyes, TCAC Opportunity Areas 3-138
Figure 3-70 Sites Inventory, Empire, TCAC Opportunity Areas 3-139
Figure 3-71 Sites Inventory, North Ceres, TCAC Opportunity Areas 3-140
Figure 3-72 Sites Inventory, East Oakdale, TCAC Opportunity Areas 3-141
Figure 3-73 Sites Inventory, Valley Home, TCAC Opportunity Areas 3-142
Figure 3-74 Sites Inventory, West Modesto, TCAC Opportunity Areas 3-143
Figure 5-1 Planned and Approved Projects 5-6
Figure 5-2 Sites Identified in Airport 5-15
Figure 5-3 Sites Identified in Bret Harte 5-19
Figure 5-4 Sites Identified in Crow's Landing 5-22
Figure 5-5 Sites Identified in Del Rio 5-26
Figure 5-6 Sites Identified in Denair 5-29

Figure 5-7 Sites Identified in Diablo Grande 5-35
Figure 5-8 Sites Identified in Empire 5-38
Figure 5-9 Sites Identified in Grayson 5-41
Figure 5-10 Sites Identified in Hickman 5-44
Figure 5-11 Sites Identified in Keyes 5-47
Figure 5-12 Sites Identified in North Ceres 5-51
Figure 5-13 Sites Identified in East Oakdale 5-55
Figure 5-14 Sites Identified in Salida 5-58
Figure 5-15 Sites Identified in South Ceres 5-61
Figure 5-16 Sites Identified in Turlock (Kenwood/Star) 5-64
Figure 5-17 Sites Identified in Valley Home 5-67
Figure 5-18 Sites Identified in West Modesto 5-72

Appendices

Appendix A Summary of Public Participation
Appendix B Review of Past Accomplishments
Appendix C Sites Inventory

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1 Introduction

1.1 Purpose of Housing Element

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

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

The Housing Element is the central tool used by the state to ensure local governments are appropriately planning for and accommodating enough housing across all income levels. This Housing Element covers the planning period 2023-2031 and represents the 6th cycle Housing Element update. The purpose of the Housing Element is to provide an assessment of current and future housing needs for the next eight years and establish housing goals, policies, and programs that identify housing needs, reduce barriers to development, and ensure compliance with state legislation. The California Department of Housing and Community Development (HCD) assumes responsibility for reviewing every Housing Element to certify it complies with state law.

The Housing Element must include:

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

1.2 Relationship to Other General Plan Elements

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

The most important aspect of consistency among General Plan elements is that policies and implementation measures do not conflict, and support one another to achieve the overall goals and vision of a general plan. In preparing the 2023-2031 Housing Element, the County prepared a General Plan Consistency Memo to ensure consistency between the Housing Element and other elements of the General Plan (i.e., Land Use Element, Conservation/Open Space Element, Circulation Element, Noise Element) and to ensure the General Plan is up to date with all statutory requirements. The County also reviewed and revised the goals and policies in the various elements of the General Plan to maintain consistency with the Housing Element Update. The Safety Element was updated concurrently with the 6th cycle Housing Element update in accordance with State law and will be adopted separately.

Additionally, policies pertaining to environmental justice, climate resiliency, and disadvantaged communities were also prepared by the County and will be incorporated into the General Plan. Jurisdictions with disadvantaged communities must address environmental justice in their general plans, per Senate Bill (SB) 1000, Government Code Section 65302(h). There are Disadvantaged Communities (DACs) in Stanislaus County, and therefore the County has identified and acted to reduce compounded health risks through the incorporation of Environmental Justice policies throughout the General Plan. Not only does the State recognize environmental degradation and the impacts to health on these communities, but also requires the jurisdiction to establish policies to reduce compounded health risks by reducing pollution exposure, improve air quality, provide public facilities, promote physical activity, and provide access to healthy foods and sanitary homes and environments. Additionally, the County has committed to updating the Land Use Element and Zoning Ordinance for consistency with the Housing Element Update. When any element of the General Plan is amended in the future, the County will review all elements and amend the General Plan as necessary to maintain internal consistency.

1.2.1 Organization of the Housing Element

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

- **Chapter 1: Introduction.** This section provides an overview of the County and Housing Element requirements.
- **Chapter 2: Housing Needs Assessment.** This section reviews the existing and projected housing needs of the community. It provides a profile of socio-demographic information, such as population characteristics, household information, housing stock, tenure, and housing affordability. The assessment also considers local special housing needs, such as seniors, farmworkers, homeless, large households, and female-headed households.
- **Chapter 3: Constraints.** This section identifies and analyzes governmental and nongovernmental impediments to housing production across all income levels.
- **Chapter 4: Assessment of Fair Housing.** This section provides an analysis of fair housing issues and a summary of contributing factors that serve as barriers to fair housing choice and access to opportunities in Stanislaus County. The purpose of the Assessment of Fair Housing is to replace segregated living patterns with truly integrated and balanced living patterns and to transform racially and ethnically concentrated areas of poverty into areas of opportunity.
- **Chapter 5: Sites Inventory and Analysis and Housing Resources.** The Housing Element must contain an inventory of land suitably zoned and available for residential development within the planning period. The Sites Inventory analysis describes the assumptions informing the Sites

Inventory and the relationship of zoning and services to the sites. This section also describes administrative and financial resources available to housing development in the jurisdiction.

- **Chapter 6: Housing Plan.** This section provides a statement of the community's goals, quantified objectives, and policies to maintain, preserve, improve, and develop housing. It also provides a schedule of meaningful actions to be taken during the planning period to achieve the aforementioned goals, objectives, and policies. It includes quantified objectives for new construction, rehabilitation, and conserved units by income category to make sure that both the existing and the projected housing needs are met, consistent with the County's share of the RHNA.
- **Appendix A: Public Outreach.** This section contains detailed summaries of community engagement as well as actual materials used in engagement events.
- **Appendix B: Review of Past Accomplishments.** This section reviews the results of the goals, policies, and programs adopted in the previous Housing Element and compares projected outcomes with actual achieved results.

1.3 Data Sources and Methods

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

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

1.4 Community Profile

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

Stanislaus County, including Ceres, Hughson, Modesto, Newman, Oakdale, Patterson, Riverbank, Turlock, and Waterford.

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

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

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

1.4.1 History of Stanislaus County

Introduction

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

Land Grants

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

Gold Rush

Between 1848-1855 the gold rush brought many people through Stanislaus County to mine along the Stanislaus River, for trade on their way to the gold fields in the Sierra Nevada Mountains, and to farm to produce products to sell to the new influx of people coming into the area. In the early days of the

[1] Historicmodesto.com, Early History, “Natives of Stanislaus, Chief Estanislao”
[2] Cowan, Robert G. (1977) p. 4. "Ranchos of California" a list of Spanish Concessions 1775–1822 and Mexican Grants 1822–1846. Academy Library Guild, Fresno, California
[3] "Spanish and Mexican Land Grant Maps, 1855–1875" Archived 2012-01-08 at the Wayback Machine, California State Archives

gold rush the Stanislaus River, known as the "Southern Mines", and the eastern area of the Tuolumne River near La Grange, were gold-bearing streams; however, the gold in the rivers quickly dried up in Stanislaus County during the early part of the gold rush[4].

Throughout the gold rush period, agriculture and ranching expanded throughout the County to meet the needs of the settlers, leading to the establishment of farming settlers in the area. Towards the end of the gold rush period, Stanislaus County was formed from a portion of Tuolumne County and was incorporated on April 1, 1854; the county seat was moved four times from 1954 to 1862, first situated at Adamsville in June 1854, then moving to Empire in October 1854, then to La Grange in 1856, and then to Knights Ferry in 1862[5].

Railroad

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

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

Industrialization and Residential Development from the Late 1800s to Today

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

The Great Depression, which began in 1929, slowed growth in Stanislaus County and brought widespread unemployment. However, Stanislaus County's diverse agriculture and food processing industries helped Stanislaus County weather the Great Depression. Some of Modesto's largest

[4] "California Gold Rush, 1848–1864". Learn California.org, a site designed for the Secretary of State of California. Archived from the original on July 27, 2011. Retrieved August 22, 2011.
[5] George Henry Tinkham, 1821, History of Stanislaus County California, Historic Record Company, Los Angeles
[6] Historicmodesto.com, Early History, "A Railroad Town, Transformation of Paradise Valley"
[7] Cprr.org, Central Pacific Railroad, History.

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

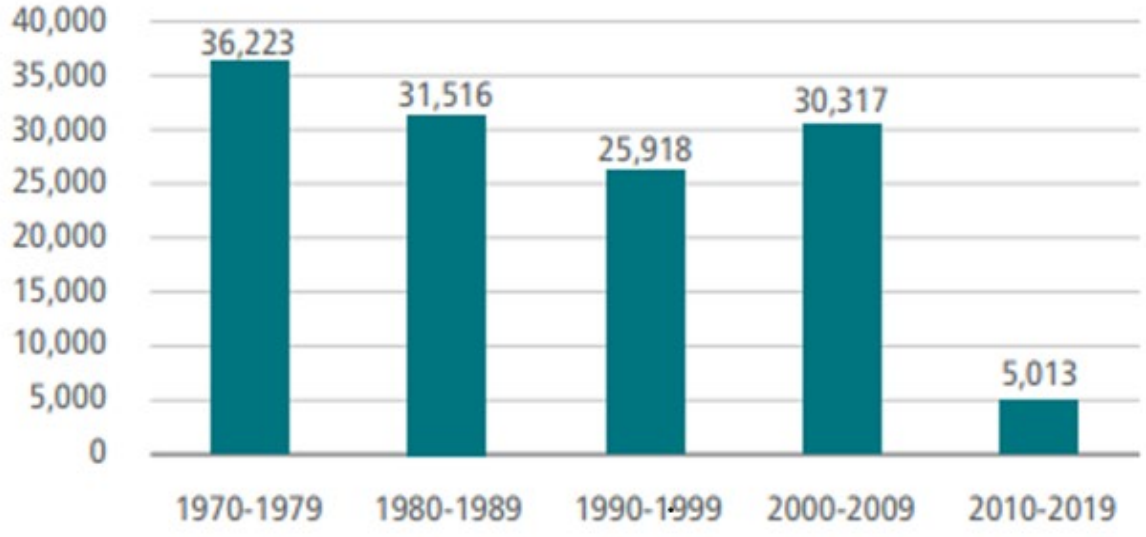
During World War II, many citizens left to work on the war effort, leaving a labor shortage, which was particularly hard on farmers, who needed a substantial labor force to harvest crops. Local food processing plants were pressed into service to provide canned goods for the war effort. The military closed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

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

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

[8] "How the Suburbs Shaped America, and California Shaped the Suburbs", Jonathan Vankin, Feb. 28, 2023, California Local online publication.
[9] "Population of Counties by Decennial Census: 1900 to 1990". United States Census Bureau. Retrieved May 31, 2014.
[10] The 40-Year Decline in California's Housing Production. Andrew R. Henderson. Feb. 22, 2021.

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



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

According to 2010 and 2020 Census data, the population of the County as a whole grew by seven percent, while the population of unincorporated Stanislaus County increased by only 1.2 percent. Most of Stanislaus County's population increase from 2010 to 2020 occurred within the nine incorporated cities, rather than the unincorporated area of the County[11]. From 2021 to 2022, Stanislaus County is estimated to have had a -0.03 percent population decline, whereas unincorporated Stanislaus County saw a decline between 2021 and 2022 of -0.6 percent. Even though the population is not growing as rapidly as in previous years, there is still a prominent housing shortage. An Affordable Housing Needs Report produced by the California Housing Partnership in 2023 indicates that Stanislaus County as a whole has a shortfall of 14,486 residential units available at a price that can be afforded by the average renter household[12].

Legal Agreements Involving Residential Development in Unincorporated Stanislaus County

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

The Low to Moderate Income (LMI) Housing Fund/1991 CRLA agreement, between the Stanislaus County Redevelopment Agency (RDA) and California Rural Legal Assistance (CRLA) on November 15, 1991, required the RDA to: (1) set aside and expend at least 25 percent of gross tax increment revenue generated from property within the redevelopment area to expand and improve the supply of affordable housing; (2) prepare a Community Plan for the Airport, Shackleford, South 7th Street, and Butte/Glenn/Imperial neighborhoods; (3) ensure replacement housing and relocation assistance is provided in the Airport and South 7th Street neighborhoods when tenants are required to relocate due to private or public development activity and require noticing to any tenant within in the Airport and South 7th Street neighborhoods and CRLA when a project proposes to destroy low- or very low-income housing units (this applies to RDA and Stanislaus County development applications); (4) make

[11] Annual Estimates of the Resident Population: U.S. Census Bureau, Population Division
[12] Housing Stanislaus Report. Valley Vision. November 2023.

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

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

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

1.5 Regional Housing Requirements

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

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

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

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

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

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

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

1.6 Public Participation

The Housing Element must reflect the values and preferences of the community. Accordingly, community participation is an important component of the development of this Element. Government Code Section 65583(c)(9) states that the local government must make "a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element." This process not only includes community members, but also participation from local agencies and housing groups, community organizations, and housing sponsors.

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

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

1.6.1 Project Website

To facilitate the distribution and gathering of information, a project website dedicated to the Housing Element update was created. The project website[13] provides detailed background information on the Housing Element, answers to frequently asked questions, links to upcoming and past event materials, links to articles and videos on the general plan topics, including the Housing Element. Educational materials include an introduction, informational flyers, and frequently asked questions specifically on

[13] Stanislaus County Housing Element Update website: https://www.stancounty.com/planning/pl/housing-element.shtm

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

1.6.2 Community Workshops

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

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

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

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

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

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

1.6.3 Housing Element Presentations

In July and September of 2022, consultants and County staff presented to the Planning Commission and the General Plan Update Committee (GPUC). The July presentations to the General Plan Update Committee and the Planning Commission consisted of an introduction to the Housing Element, the RHNA, State legislation, the Safety Element, environmental justice, and the project timeline. The presentation also included a discussion session on housing issues, hazards, and environmental justice issues in the county. The second presentation to the GPUC in September provided an overview of the Housing Element Sites Inventory.

A third presentation to the GPUC on April 6, 2023, solicited feedback on proposed policy and program updates in the Housing Element Housing Plan. A fourth presentation was held on August 23, 2023, to present the Draft Housing Element, amended Housing Plan, and changes to the Sites Inventory.

1.6.4 Stakeholder Interviews

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

1. Regional Trends

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

2. Issues

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

3. Needs

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

4. Constraints

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

5. Opportunities

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

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

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

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

1.6.5 Public Comment Survey

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

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

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

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

1.6.6 Participatory Map Activity

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

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

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

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

1.6.7 Municipal Advisory Council Meetings

Three presentations were made to Municipal Advisory Councils (MACs) in September and October of 2023. A MAC, as formed by California Government Code Section 31010, is an advisory body of local citizens elected by the community or appointed by the Board of Supervisors with the purpose of representing the community to the Board of Supervisors. The South Modesto MAC meeting was held on September 14, 2013, the Denair MAC meeting was held on October 3, 2023, and the Keyes MAC meeting was held on October 19, 2023. No Empire MAC meeting was held during the public comment period due to a lack of quorum. Each presentation provided an overview of the Housing Element and the Site Inventory. The following input was collected from the MAC meetings:

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

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

1.6.8 Housing Stanislaus Initiative

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

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

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

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

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

1.7 Public Review

Six comment letters were received during the public review period of August 31 to September 30, 2023. The letters received are included in Appendix A, Summary of Public Participation. Following Public Review of the Housing Element, County staff met with the California Rural Legal Assistance (CRLA) on March 1, 2024, to discuss CRLA's present concerns with the Housing Element.

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

- Outreach
  - Commenters were concerned with the level of community engagement that was conducted over the course of the Housing Element process.
  - Housing Needs Assessment
  - Clarification of details on service providers.
- AFFH
  - Request for additional information in the Fair Housing enforcement and outreach capacity section.
  - Request to incorporate local knowledge throughout the analysis.

- Request for more analysis of patterns and trends of segregation and integration and disparities in opportunities.
- Request for more analysis of disproportionate housing needs.
- Comments regarding contributing factors and prioritization of actions.
- Comments regarding the distribution of sites with regard to opportunity areas.
- Request to discuss flood risk to sites in inventory.
- Request for more sites in higher resource areas.

- Constraints
  - Clarification of onsite wastewater treatment requirements for farmworker housing.
  - Encourage County to continue to utilize by-right development review processes.

- Sites Inventory
  - Request to include residential land in Salida in Sites Inventory and request for clarification of role of Modesto infrastructure planning in Salida's infrastructure availability.
  - Request from a property owner to include a single parcel in the Sites Inventory. Property did not meet the County's criteria as it is zoned for agriculture.
  - Reiteration of Sites Inventory criteria and suggestions for additional criteria to consider. The County did not formally incorporate these additional criteria, but sites in inventory were selected for proximity to services, infrastructure availability, and development capacity in compliance with state law. The criteria for site selection and limited availability of services are discussed in detail in Section 5.5, Sites Inventory Methodology and Justification.

- Programs
  - Clarified that certain programs speak to the County's existing role and responsibility or requirements to comply with State law.
  - Request to increase rehabilitation objectives.
  - Request for additional tenant protections and anti-displacement program actions.
  - Request to remove an action in Program 2 regarding outreach to developers regarding new density bonus programs.
  - Request for additional actions regarding implementation of the Surplus Land Act.
  - Request for a program action to reduce barriers to manufactured home installation,
  - Request for fee deferral program, existing in Policy 3P.

- Utilities
  - Additional information from the Modesto Irrigation District regarding availability of utilities. No action was required to address these comments.

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

- Introduction
  - Added description of MAC meetings to this introduction.

- Housing Needs Assessment
  - Made corrections and added details about homeless service providers.

- AFFH
  - Added a description of fair housing entities operating in Stanislaus County and their activities and described fair housing issues specific to Stanislaus County.
  - Throughout the AFFH analysis, more context was given to data, using public input and local knowledge. Added analysis of overlapping trends and patterns.
  - In segregation and integration analysis, incorporated additional sources of data and adjusted conclusions accordingly.
  - In discussion of racially/ethnically concentrated areas of poverty (R/ECAPs), provided more context regarding relationship of unincorporated R/ECAPs to the City of Modesto and historical disinvestment trends.
  - In displacement risk analysis, added context and more local knowledge regarding demographic characteristics of areas at risk of displacement.
  - Discussed CalEnviroScreen data in more depth.
- Constraints
  - Added a discussion of flood risk in the county.
  - Clarified that a portion of Salida is included in the City of Modesto's Water Master Plan and Sanitation Plan.
  - Clarified that existing regulations regarding manufactured home installation are consistent with State law.
- Sites Inventory
  - Removed sites that had a low likelihood of redevelopment and expanded analysis on nonvacant sites.
  - Revised realistic capacity and allowable densities of rezone sites consistent with Government Code Section 65583.2(i).
  - Added a breakdown of the Sites Inventory by each geographic area.
  - Modified the inventory maps to more clearly show each site and the associated address and other relevant information.
  - Added a more robust discussion of infrastructure constraints and the status of public investment in alleviating those constraints.
  - The Sites Inventory was modified to include moderate- and above moderate-income units on sites suitable for the development of housing affordable to lower-income households.
- Housing Plan
  - Removed an action in Program 2-2 regarding outreach to developers regarding new density bonus programs.
  - Added an action to Program to 3-2 to maintain an administrative list of Measure E impacted lands that may be added to the Sites Inventory if and when the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County's remaining RHNA.

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2 Housing Needs Assessment

2.1 Population Trends

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

2.1.1 Population Growth

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

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

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

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

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

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

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

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

2.1.2 Age Characteristics

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

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

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

Table 2-3 Age Characteristics in Unincorporated Stanislaus

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

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

2.1.3 Race Characteristics

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

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

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

Table 2-4 Race and Ethnicity in Unincorporated Stanislaus

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

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

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

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

Immigration

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

coupled with the inability for undocumented individuals to apply for housing aid, can lead to health and safety concerns such as overcrowding.

Table 2-5 2019 Undocumented Immigration Population in Stanislaus County

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

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

2.2 Economic Trends

Surrounded by agricultural land with rich soils and a mild Mediterranean climate, Stanislaus County has a major economic stronghold in agricultural and manufacturing employment opportunities. As of 2021, the County's gross value of agricultural production was $3.5 billion, a two percent increase from the previous year[1]. According to the County of Stanislaus Comprehensive Annual Financial Report, the healthcare sector is a fast-growing sector and a large contributor to the local economy. The major employers located in the County, as reported in the County's 2020 Comprehensive Annual Financial Report, are shown in Table 2-6. The second largest employer in 2020 was in agriculture and manufacturing of agricultural goods. Another large field of employment in Stanislaus County includes jobs in public services and educational services.

2.2.1 Employment

From 2016 to 2020, approximately 228,157 Stanislaus County residents are employed in the labor force, and an estimated 8.8 percent of the County is unemployed. Of these residents, nearly 80 percent of those in the labor force reside in the incorporated cities, and 20 percent reside in the unincorporated areas of Stanislaus County. Similar to Stanislaus County as a whole, approximately 25 percent of the residents in the unincorporated areas had occupations in management, business, science, and arts. This is an important figure, as managerial jobs have higher earnings than other occupations. Nearly 22 percent of the residents held occupations in natural resources, construction, and maintenance occupations, and 19 percent had occupations in sales and office. Table 2-7 provides a summary of employment by occupation and job category for Stanislaus County residents living in the incorporated cities and unincorporated areas.

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

Table 2-6 Major Employers in Stanislaus County

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

Source: County of Stanislaus, Comprehensive Annual Financial Report 2020

Table 2-7 Occupation of Stanislaus County Residents

Job Occupation/Category	Stanislaus County Number Employed	Incorporated Number Employed	Unincorporated Number Employed	Unincorporated Percent of Total
Occupation				
Management, business, science, and arts occupations	63,889	52,108	11,781	25.4%
Service occupations	40,386	32,512	7,874	17%
Sales and office occupations	48,829	40,204	8,625	18.6%
Natural resource, construction, and maintenance occupations	32,857	22,891	9,966	21.5%
Production, transportation, and material moving operations occupations	41,984	33,908	8,076	17.4%
Total	**227,945**	**181,623**	**46,322**	**100.0%**
Category				
Agriculture, forestry, fishing and hunting, mining	12,804	7,589	5,215	11.3%
Construction	18,678	13,708	4,970	10.8%
Manufacturing	27,394	22,476	4,918	10.7%
Wholesale trade	8,533	6,752	1,781	3.9%
Retail trade	28,622	23,276	5,346	11.6%
Transportation and warehousing, and utilities	15,688	12,844	2,844	6.2%
Information	2,406	2,101	305	.7%
Finance and insurance, and real estate and rental and leasing	7,682	6,136	1,546	3.4%
Professional, scientific, and management, and administrative and waste management services	19,335	15,211	4,124	8.9%

Job Occupation/Category	Stanislaus County Number Employed	Incorporated Number Employed	Unincorporated Number Employed	Unincorporated Percent of Total
Educational services, and health care and social assistance	48,577	40,928	7,649	16.6%
Arts, entertainment, and recreation, and accommodation and food	19,559	15,819	3,740	8.1%
Other services, except public administration	10,532	8,438	2,094	4.5%
Public administration	8,365	6,793	1,572	3.4%
Total	**228,175**	**182,071**	**46,104**	**100.0%**

* Rounded percentages may not total 100 percent.

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

Table 2-8 Mean Salary by Occupation – Stanislaus County

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

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

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

2.3 Household Characteristics

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

Table 2-9 includes a variety of household characteristics, including the number and percentage of persons living in households and those living in group quarters. Group quarters are defined as places where people live or stay in a group living arrangement that are owned or managed by an organization providing housing for residents. Group quarters include places like college residence halls, residential treatment centers, skilled nursing facilities, group homes, military barracks, correctional facilities, and workers' dormitories. Those living in group quarters make up just one percent of the total population for both the incorporated and unincorporated areas of Stanislaus County and two percent in the state. Though this percentage is small, it accounts for 1,489 people that live in specialized housing situations.

Table 2-9 also includes the number of housing units that are occupied or vacant. A certain number of vacant housing units are needed in any community to moderate the cost of housing, allow for sufficient supply and housing choices, and to provide an incentive for landlords and owners to maintain their housing. Residential vacancy rates are a good indicator of how well the current supply of housing is meeting the demand for various types of units. As further discussed in the Housing Vacancy section, a typical vacancy rate of five to six percent for rental housing and 1.5 to two percent for ownership housing indicates a balance between supply and demand within the housing market. Comparatively, the proportion of occupied housing units and vacant units is similar for the incorporated and unincorporated areas of Stanislaus County and the state with a vacancy of about

eight percent, which indicates a higher vacancy rate than what is typically considered balanced. While this is a trend that is consistent across the entire county and state, it signifies that there is a decline in demand for housing based on the decline in population.

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

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

Table 2-9 Household Characteristics for 2010 and 2020

	Unincorporated				Incorporated				State of California			
	2010		2020		2010		2020		2010		2020	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total Population	110,236	–	113,060	–	404,217	–	441,871	–	37,253,956	–	39,648,938	–
Household Population												
Persons Living in Households	108,912	99%	111,571	99%	399,236	99%	436,459	99%	36,412,191	98%	38,796,056	98%
Persons Living in Group Quarters	1,324	1%	1,489	1%	4,981	1%	5,412	1%	841,765	2%	852,882	2%
Total Housing Units	36,684	–	36,350	–	142,819	–	146,718	–	13,670,304	–	14,330,043	–
Occupancy												
Occupied Housing Units (Households)	33,579	92%	33,327	92%	131,601	92%	139,333	95%	12,568,167	92%	13,246,622	92%
Vacant Housing Units	3,105	8%	3,023	8%	11,218	8%	7,385	5%	1,102,137	8%	1,083,421	8%
Tenure												
Owner-Occupied	22315	66%	21,208	61%	79,511	61%	81,467	58%	7,112,050	57%	7,241,318	55%
Renter-Occupied	11631	34%	13,449	39%	50,384	39%	58,702	42%	5,280,802	43%	5,861,796	45%
Total Households	33,946	–	34,657	–	129,895	–	140,169	–	12,392,852	–	13,103,114	–
Household Type												
Family Households	26,529	78%	26,771	77%	122,255	94%	130,057	93%	8,495,322	69%	8,986,666	69%
Non-family Households	7,417	22%	7,886	23%	7,640	6%	10,112	7%	3,897,530	31%	4,116,448	31%

* Rounded percentages may not total 100 percent.

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

2.4 Housing Stock

Housing Unit Types

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

Table 2-10 Unincorporated Stanislaus County Housing Unit Type

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

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

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

Housing Age and Condition

The age and condition of the housing stock provides additional measures of housing adequacy and availability in many communities. The year a structure was built can be an indicator of the current condition of the housing unit. Homes with sound construction typically show signs of deterioration and need repair after 30 years if not adequately maintained—some even sooner depending on the construction technique and weather conditions. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, thereby depressing neighboring property values. Although age does not always correlate with substandard housing conditions, neighborhoods with homes more than 30 years old are more likely than newer neighborhoods to have a concentration of housing problems related to deferred maintenance, inadequate landscaping care, outdated utilities or interior amenities, and a need for housing rehabilitation. Communities in the county that are older, or have older neighborhoods, and likely have a higher concentration of housing in need of rehabilitation are Airport, Empire, North Ceres, South Ceres, Turlock, areas of West Modesto, Crows Landing, Denair, Grayson, Hickman, Salida, and Valley Home. Several of these areas align with designated areas of

Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). Of the four R/ECAP, two of them overlap with Airport and Ceres.

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

Table 2-11 Stanislaus County Housing Production

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

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

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

Table 2-12 Unincorporated Stanislaus County Substandard Units

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

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

According to Stanislaus County 2024 Assessor data, 596 units, or 1.6 percent of the total housing stock in unincorporated Stanislaus County, are classified as substandard and may be in need of rehabilitation or replacement during the planning period. While a recent Countywide survey of

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

Table 2-13 Code Enforcement Cases

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

Source: Stanislaus County Annual Progress reports 2015 through 2020

Housing Vacancy

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

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

Table 2-14 Unincorporated Stanislaus Vacancy Rates

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

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

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

Overcrowding

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

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

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

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

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

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

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

Table 2-16 Unincorporated Stanislaus County, Overcrowded Housing Conditions

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

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

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

Fair Market Rent

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

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

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

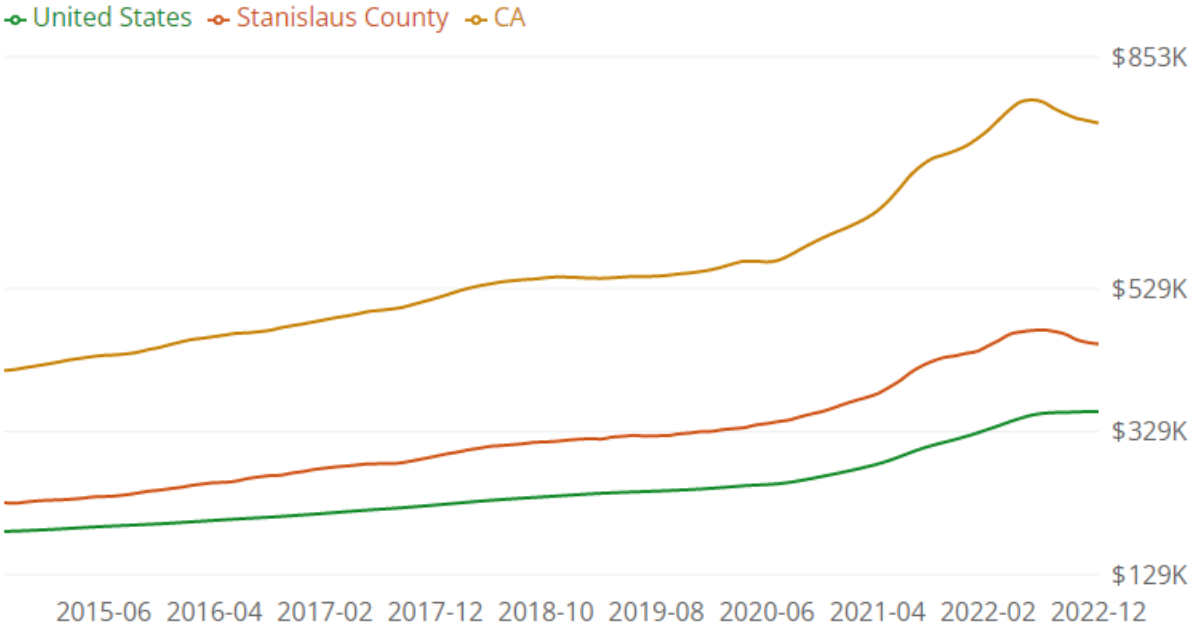
Bedrooms in Unit	Stanislaus County 2022	Stanislaus County 2021
1 Bedroom	$1,001	$987
2 Bedrooms	$1,250	$1,224
3 Bedrooms	$1,761	$1,733
4 Bedrooms	$2,063	$2,033

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

Home Values

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

Figure 2-1 Median Home Values (2022)



Source: Home Value Index, Zillow, 2022

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

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

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

Source: Redfin, Accessed February 2023

Rental Costs

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

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

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

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

Rents increased throughout the nation during the 2009 recession in response to high foreclosure rates, lack of new housing development, and tightened standards for home loans. In addition, more people moved from homeownership to renting, which increased demand for rental housing. Post-economic recession, Stanislaus County continues to see demand for rental housing units as evidenced by housing tenure data and current local data sources. The median listing price for two-bedroom apartments found on Zillow.com was $1,750 in March of 2024, and the overall median rental price in Stanislaus County, according to HotPads.com, was $1,833[2].

Ability to Pay for Housing

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

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

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

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

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

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

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

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

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

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

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

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

Affordability in Stanislaus County

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

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

In Stanislaus County, 19 percent of all households had a moderate housing cost burden and 17 percent had a severe housing cost burden. Based on the CHAS data presented in Table 2-21 below, 72 percent of lower-income households in Stanislaus County had at least a moderate cost burden, with 41 percent of lower-income households classified as severely cost burdened. Housing cost burden was generally higher among renter households. For example, 77 percent of lower-income renter households had a moderate to severe cost burden compared to 63 percent of lower-income owner households. In Stanislaus County, 25 percent of renter households experience severe cost burden. In conclusion, affordable rent in the County is just as necessary as affordable homeownership. As shown in Table 2-22, extremely low-income households are significantly more cost burdened than moderate- or above moderate-income households. Seventy-nine percent of extremely low-income households experience a cost burden, while only nine percent of households making above 100 percent AMI experience cost burden.

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

	Owner	Renter	Total
Household Income <= 80% AMI			
Total Households	**24,075**	**40,445**	**64,520**
Number w/ cost burden >30%	15,170	31,325	46,600
Percent w/ cost burden >30%	63%	77%	72%
Number w/ cost burden >50%	8,790	18,285	27,075
Percent w/ cost burden >50%	37%	45%	41%
Household Income > 80% AMI			
Total Households	**75,000**	**33,160**	**108,160**
Number w/ cost burden >30%	11,340	4,755	16,095
Percent w/ cost burden >30%	15%	14%	15%
Number w/ cost burden >50%	1,725	385	2,115
Percent w/ cost burden >50%	2.3%	1.2%	2%

	Owner	Renter	Total
All Households			
Total Households	**99,080**	**73,605**	**172,680**
Number w/ cost burden >30%	26,510	36,080	62,595
Percent w/ cost burden >30%	27%	49%	36%
Number w/ cost burden >50%	10,515	18,670	29,185
Percent w/ cost burden >50%	11%	25%	17%

Source: HUD ACS 2014-2018, Accessed July 2022

Table 2-22 CHAS Table ACS Housing Cost Burden by Household Income Classification (Stanislaus County)

	Household Income <= 30% AMI	Household Income >30% to <=50% AMI	Household Income >50% to <=80% AMI	Household Income >80% to <=100% AMI	Household Income >100% AMI
Total	18,765	19,645	29,870	17,530	89,260
Number w/ cost burden >30%	14,740	15,290	17,660	5,655	7,905
Percent w/ cost burden >30%	79%	78%	59%	32%	9%

2.5 Special Groups

Certain segments of the population may have more difficulty in finding decent, affordable housing due to their special needs. Under Government Code Section 65583(a)(7)), groups that may have special housing needs include the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter. These special needs groups are sometimes discriminated against based on their specific needs or circumstances, and often spend a disproportionate amount of their income to secure safe and decent housing. The majority of these special groups could be assisted by an increase in affordable housing, especially housing located near public transportation and other services. The following sections provide a detailed discussion of the housing needs facing each particular group as well as programs and services available to address their housing needs. Table 2-23 shows the size of each special needs group in unincorporated Stanislaus County.

Table 2-23 Special Needs Groups in Unincorporated Stanislaus County

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

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

2.5.1 Elderly Persons (Senior Households)

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

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

According to the 2016-2020 ACS, approximately 17,518 seniors resided within the unincorporated areas of Stanislaus County, making up about 15 percent of the total population in unincorporated Stanislaus County. This representation is slightly above the senior population in incorporated cities within the County of Stanislaus, where seniors comprise about 13 percent of the population. Stanislaus County is slightly more compared to the state as a whole, by a margin of one percent, where the state has a total of 5,644,497 seniors, totaling 14 percent of the total population as seen in Table 2-24.

As mentioned above, seniors may have difficulty finding affordable housing that meets their needs and preferences due to fixed incomes. This is especially true for renters, as they are vulnerable to increasing rents as opposed to homeowners with fixed mortgages. According to ACS 2020 5-year estimates, 1,432 senior residents were renters in unincorporated Stanislaus County, and 7,994 seniors were homeowners. As shown in Table 2-25, the unincorporated areas have a higher percentage of senior homeowners compared to the total households in incorporated cities throughout the county, by a margin of nearly seven percent. Overall, the unincorporated areas of the county have a larger number of senior households per capita compared to incorporated cities.

Table 2-24 Senior Population Compared to the State

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

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

Table 2-25 Seniors by Tenure

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

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

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

Resources

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

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

Many services are available for elderly residents to age comfortably in their homes that include assistance with housing options, access to medical services through volunteer drivers, and home repair services. Further expansion of affordable housing may also help alleviate the challenges that seniors are facing. Based on a 2017 HUD Office of Policy Development and Research article[3], affordability challenges among seniors are expected to grow, where declining incomes can prevent senior households from making home repairs and paying for health services. Strategies that link better and affordable housing to services can help seniors, especially in unincorporated areas, age in their home comfortably where they are socially connected and can continue to lead social and healthy lives.

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

- Program 4-1: Housing for Special Needs Populations

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

2.5.2 Farmworkers

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

Farmworker households tend to have high rates of poverty, live disproportionately in housing that is in the poorest condition, have extremely high rates of overcrowding, and have low homeownership rates. In a 2023 Farmworker Health Study (FWHS) conducted by the UC Merced Community and Labor Center, 92 percent of farmworkers in California were likely to be renters, and many were subject to substandard housing conditions including overcrowding, with 55 percent living in households with two persons per room, and 25 percent of household where three or more persons share a room.[4] Housing problems and crowded conditions can exacerbate respiratory and infectious disease. Farmworkers often have negative health outcomes related to various aspects of the job itself; long hours, underpayment, low benefits, and poor conditions contribute to the poor health and well-being of the group. As discussed in the Section 2.2.1, *Employment*, this group also receives the lowest average annual salary in the region compared to all other occupation groups, which contributes to the disproportionate need for fair housing.

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

[4] Farmworker Health in California. UC Merced. August 2022. https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf?_gl=1*1rg0e9w*_ga*MTU3Njc2MDMzNS4xNzA4OTk2Nzgx*_ga_TSE2LSBDQZ*MTcwODk5Njc4MC4xLjAuMTcwODk5Njc4MC42MC4wLjA.

When comparing the percentage of farmworkers to the state, farmworkers in Stanislaus County represent a larger percentage of employment with nearly six percent of employees classified as farmworkers, compared to two percent of the state as seen in Table 2-26. Furthermore, the unincorporated area of Stanislaus County has a higher percentage of farmworkers as compared to the incorporated areas by nearly double the percent. In 2020, unincorporated Stanislaus County, had 5,215 farmworkers reported in the agriculture, forestry, fishing and hunting, and mining industry. This industry totals 11 percent of the labor force within unincorporated Stanislaus County, compared to four percent in the incorporated cities of Stanislaus County.

Table 2-26 Farmworkers in Stanislaus County

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

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

Table 2-27 Farmworker Employment by Workers

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

Source: Census of Agriculture, 2017

Determining an accurate count for farmworker populations is difficult. There can be discrepancies in the definition of farmworkers based on job descriptions and length of employment, and the underrepresentation that migrant workers often face. The seasonality of farm work, lack of stable income, and low average annual salaries results in significant challenges for farmworkers to afford housing. As seen in Table 2-27, more than half of all the workers in farm operations are seasonal, meaning income is uncertain at varying seasons of the year for half of farmworkers in Stanislaus County. According to the 2017 Census of Agriculture,[5] 6,429 farmworkers in Stanislaus County were seasonal and 6,284 workers were permanent. This trend is common throughout the state, where half of the total laborers are seasonal, regardless of the scale of farm operations.

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

Resources

Farmworkers are unable to compete for housing as they are usually low income and their employment status is often seasonal creating a disproportionate need for housing resources. The Stanislaus County 2022 Affordable Housing Needs report[6] provided by California Housing Partnership (CHPC) shows that farmworkers make an average of $2,573 per month. Housing types appropriate to accommodate the housing needs of seasonal and permanent farmworkers range from single-family to group quarters. In Stanislaus County, there are various options for permitting farmworker housing. Single mobile homes can be permitted as a Temporary Mobile Home for onsite farmworkers, usually for confined animal facilities. Additionally, a staff approval permit can be used to permit on-site farm worker housing to support on-site agricultural operations in the agricultural zoning district. And finally, farmworker housing for off-site workers may be permitted when a use permit is obtained.

Certain programs and services are offered by agencies to support farmworkers and their families. According to organizations such as the National Migrant and Seasonal Head Start (MSHS) who provide comprehensive child development and family support services to infants, toddlers, preschool children and their families whose parents or guardians are migrant or farmworkers, these populations tend to live in poverty and substandard living. Currently, the Stanislaus Regional Housing Authority manages 224 housing units for migrant farm workers in Empire, Patterson, and Westley which are owned by the State of California and Office of Migrant Services. However, the 2017 Census of Agriculture[4] indicated there were over 7,000 seasonal farmworkers and 6,284 permanent farmworkers in Stanislaus County.

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

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

2.5.3 Persons with Disabilities (including Developmental Disabilities)

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

- Individuals with ambulatory difficulties (such as those confined to wheelchairs) may require special accommodations or modifications to their homes to allow for continued independent living. Such modifications are often called “disabled access.”
- Individuals with self-care limitations (which can include persons with mobility difficulties) may require residential environments that include in-home or on-site support services ranging from congregate to convalescent care. Support services can include medical therapy, daily living assistance, congregate dining, and related services.

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

- Individuals with developmental disabilities and other physical and cognitive conditions that prevent them from functioning independently may require assisted care or group home environments.
- Individuals with disabilities may require financial assistance to meet their housing needs because a higher percentage than the population at large are low-income and their special housing needs are often more costly than conventional housing.

In unincorporated Stanislaus County, those with ambulatory difficulty make up the largest percentage of those with disabilities at approximately six percent of the total population. The second largest group is those with a cognitive difficulty, at 4.8 percent of the total population in the unincorporated area, similar to the 5.3 percent county as a whole. A total of 14,824 are living with a disability in unincorporated areas, and 70,846 total in the county (Table 2-28).

Table 2-28 Disability by Type in Stanislaus County

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

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

Resources

Those with severe physical or mental disabilities may require supportive housing, care facilities or home modifications for accessibility. Additionally, those with disabilities that rely on Social Security income may not be able to afford market rate housing or adaptability modifications. State and federal legislation mandates that a percentage of units in new or substantially rehabilitated multi-family apartment complexes must be made accessible to individuals with limited physical mobility. For example, accessibility requirements for federally assisted housing with five or more units requires at least five percent of the dwelling units to be accessible for persons with mobility disabilities. The County does fund supportive housing projects for persons with disabilities, but such housing projects are typically developed within cities due to the proximity to services. However, unincorporated Stanislaus County does not have multi-family apartments or developments that are government funded, which is a gap in local resources.

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

service programs, which are available in the county and provide services such as basic domestic chores, personal care, and paramedical tasks.

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

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

2.5.4 Large Families

Large households are defined as households of five or more individuals. Large households often face special challenges in the housing market because they need housing of sufficient size to prevent overcrowding and do not always have sufficient income to purchase or rent such housing, even if it is available. According to the 2016-2020 American Community Survey, there are an estimated 7,021 large households in unincorporated Stanislaus County. This accounts for approximately 20 percent of occupied households in the unincorporated County. In comparison, an estimated 16 percent of the incorporated County occupied households are large households (Table 2-29).

Table 2-29 Unincorporated Stanislaus Household Size by Tenure

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

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

Resources

Large families may face housing issues such as overcrowding due to the lack of adequate housing with three or more bedrooms. In Stanislaus County, a large percentage of renters have households with five or more people which indicates a need for more affordable rental units with three or more bedrooms. Currently, Stanislaus County funds non-profits which have rental assistance and utility assistance programs based on household size and income. To further accommodate large households, the County can facilitate the development of rental housing with three or more bedrooms. Large households may also result due to multiple generations and extended family members living together to share housing costs. In this case housing assistance programs can help families find affordable housing options. Renters can apply for the Emergency Rental Assistance program or for Housing Choice Voucher program (formerly known as Section 8). However, the demand for housing assistance often exceeds the limited resources available and therefore long waiting periods are common. Options for owner-occupied large households may include Accessory Dwelling Units (ADUS). Establishing an ADU grant program can help relieve overcrowding in multigenerational or extended

family households by providing financial assistance to build an accessory dwelling unit on the property.

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

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

2.5.5 Female-Headed Households

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

Table 2-30 shows the number and percent of female-headed households in the incorporated and unincorporated county. There are an estimated 4,399 female-headed households in unincorporated Stanislaus County. This accounts for about 16 percent of the total households in unincorporated Stanislaus County. Of the unincorporated population of female-headed households 1,403 live under the poverty level which is 31 percent of the total female-headed households.

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

Table 2-30 Unincorporated Stanislaus Female Headed Households and Poverty Level

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

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

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

Resources

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

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

2.5.6 Extremely Low-Income Households

Extremely low-income (ELI) households are defined by HCD as households with income less than 30 percent of AMI, which in unincorporated Stanislaus County is a $27,750 annual income for a family of four, as of 2022. ELI households have a variety of housing problems such as overpayment, overcrowding, and substandard housing conditions, as well as accessibility issues due to their limited incomes. Many ELI households overlap with other special needs groups including seniors, persons with disabilities, farmworkers, or female-headed households, which furthers the need for supportive or affordable housing. Many special needs groups, such as seniors and people with disabilities, fall into the ELI category due to their reliance on fixed incomes such as Social Security, which may not keep pace with rising living costs. This overlap is particularly pronounced among people with special housing needs, such as those requiring accessible housing due to physical disabilities or those needing supportive services due to health conditions.

Additionally, ELI households are more likely to be renters. As discussed in *Ability to Pay for Housing*, lower-income renter households were more likely to face moderate to severe cost burden compared to lower-income owner households. As discussed in Chapter 5, *Housing Resources*, StanCOG estimates that around 50 percent of the allocated very low-income housing units in unincorporated Stanislaus County would be needed for ELI households, or 275 projected housing units during the planning period. [7]

Table 2-31 identifies extremely low-income households by tenure for Stanislaus County. Extremely low-income households represent 10.8 percent of total households in Stanislaus County; with renter-occupied households making up 7.7 percent and owner-occupied making up 3.1 percent of total households. Across the state, extremely low-income households make up 15.3 percent of total households. When compared to Stanislaus County, the state had a notably higher percentage of extremely low-income households.

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

Table 2-31 Extremely Low-Income Households by Tenure

Jurisdiction	Income <=30% HAMFI			Total Households
	Owner-Occupied	Renter-Occupied	Total ELI Households	
California	**592,010**	**1,427,405**	**2,019,415**	**13,217,586**
Percent	4.5%	10.8%	15.3%	100.0%
Stanislaus County	**5355**	**13,360**	**18,715**	**173,900**
Percent	3.1%	7.7%	10.8%	100.0%

Source: U.S. Housing and Urban Development, CHAS 2015-19 (5-Year Estimates), Table 7.

Table 2-32 shows extremely low-income households overpaying by tenure in Stanislaus County. Overpaying households are those that have housing cost burdens of more than 30 percent of their income towards housing. As shown, most extremely low-income households have a household cost burden of at least 30 percent, regardless of tenure. Renter-occupied households are more likely to experience a housing cost burden (80.2 percent) than owner-occupied households (74.8 percent). The percentage of owner and renter households experiencing housing cost burden in Stanislaus Countyis similar to the percentage across the state (85.6 percent).

Table 2-32 Extremely Low-Income Households Overpaying by Tenure

Jurisdiction	Owner-Occupied			Renter-Occupied		
	Cost Burden 30%-50%	Severe Cost Burden >50%	Total Households	Cost Burden 30%-50%	Severe Cost Burden >50%	Total Households
California	472,025	384,275	631,380	1,111,370	947,360	1,388,145
Percent of Total	74.7%	60.8%	100%	80.1%	68.24%	100%
Stanislaus County	4,530	3,685	6,050	10,210	9,420	12,715
Percent	74.8%	60.9%	100%	80.2%	74.1%	100%

Source: US Housing and Urban Development, CHAS 2017-21 (5-Year Estimates).

ELI households are particularly vulnerable to overcrowding due to their limited financial resources. To afford rent, they often share housing with extended family or other households, resulting in higher rates of overcrowding. Additionally, ELI households face a high risk of displacement and are the first to be affected by rent increases. Furthermore, these households frequently reside in older, poorly maintained housing units due to affordability constraints, which can lead to issues such as mold, structural damage, and inadequate heating or cooling.

Resources

ELI households are disproportionately affected by fair housing issues including cost burden, housing problems, and displacement. These households may also need assistance with housing subsidies and other supportive housing services. Future housing needed for ELI would likely be rental housing; therefore, resources for renters at all income levels would also benefit ELI households. Currently, Stanislaus County funds non-profits which have rental assistance and utility assistance programs based on household size and income. Additionally, renters can apply for the Emergency Rental Assistance program or for the Housing Choice Voucher program. Households that are considered ELI due to their fixed incomes, such as seniors and persons with disabilities, would benefit from the

County's supportive housing projects for seniors and persons with disabilities, such as in-home services, assisted housing, and transportation services. However, such housing projects are typically developed within cities due to the proximity to services. Unincorporated Stanislaus County does not have multi-family apartments or developments that are government funded.

ELI households that are geographically isolated or have language access barriers may struggle with accessing resources that are available to them. These barriers can make it harder to reach ELI households, resulting in fewer opportunities for ELI households to become aware of existing county programs. To combat this issue, the following programs are included in Chapter 6, *Housing Plan* to address the need for additional housing and resources for ELI households:

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

2.5.7 Homelessness

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

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

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

Homelessness continues to be a growing regional and state crisis. A lack of affordable housing compounded by a lack of job training and supportive services to treat mental illness, substance abuse, or domestic violence leaves many individuals and families without housing. Services and facilities available for the homeless in Stanislaus County are organized as a continuum of care, an integrated system that guides homeless individuals and families throughout the housing process. Efforts are coordinated by the Stanislaus Community System of Care (StanCSOC), where prevention and reduction of homelessness is managed by combining efforts from several sectors including government, business, health, non-profits, education, faith, neighborhood, media, arts and entertainment to promote health and well-being.

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

Table 2-33 Homelessness in Stanislaus County

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

Source: Point-in-Time

In 2022, a total of 1,857 people experienced homelessness in Stanislaus County, a 37 percent decrease from 2021 as seen in Table 2-33. In 2020, there were a total of 1,632 beds, where 1,114 were beds for households with no children, and 496 beds for households with children, and 22 beds for households with only children. Of those experiencing homelessness, nearly 75 percent were unsheltered, and 25 percent were sheltered. The largest group counted were primarily single adults or households without children representing nearly 75 percent of the total population, where 612 households were unsheltered and 413 were sheltered. The second largest group were family households, where 459 were unsheltered, and 102 were sheltered. Unaccompanied youth made up the third largest group that is unsheltered, with 85 unsheltered and 23 sheltered. Households with youth who are parents were unsheltered at a count of 77 and a count of eight sheltered. Veterans were mostly sheltered, however, 28 were unsheltered and 43 were sheltered.

Typically, it is more common for males to represent most of the homeless population. According to the Stanislaus County 2021 Regional Homeless Strategic Plan (Strategic Plan)[8], in 2022[9], men represented 65 percent of the homeless within the system of care and increased by nine percent from 2021 to 2022. Another disparity among the homeless population is LGBTQ, as transgender and gender non-conforming people experience homelessness nearly one out of three times and may be underreported out of fear of disclosing their identity.

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

Resources

The Stanislaus Continuum of Care (CoC) and the Homelessness Action Council merged efforts in 2017 to form CSOC, a 25-member council regional planning body that coordinates housing and services funding for homeless families and individuals. Efforts focus on the well-being of the community through the alignment of community partners to prevent and reduce homelessness. Stanislaus

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

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

County has passed a Focus on Prevention initiative, where the focus shifts from isolated interventions and fosters community well-being through a system of care.

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

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

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

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

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

2.6 Affordable Housing at Risk of Conversion

Government Code Section 65583(a)(8) requires an analysis of existing assisted multi-family housing developments for low-income renters that are eligible to change to market-rate units during the next ten-year period due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. The analysis must inventory each development by project name and address, the type of government assistance received, the earliest possible date of change from low-income use, and the total number of senior and non-senior units that could be lost from the local low-income housing stock. In addition, the analysis is required to assess the conversion risk and displacement of low-income tenants, estimate and analyze the costs of replacement versus preservation of at-risk units, identify entities qualified to preserve at-risk units, and identify financing and subsidy resources.

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

3 Affirmatively Furthering Fair Housing

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

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

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

3.1 Local Analysis

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

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

Table 3-1 Census-Designated Places in Stanislaus County

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

* The Bret Harte, Parklawn, and Riverdale Park Tract CDPs are located in the South Modesto area.

** The Bystrom CDP is located in the North Ceres area.

*** The Rouse/Colorado CDP is located in the West Modesto area. The West Modesto CDP is made up of multiple neighborhoods.

Source: *ACS 2020 Decennial Census, P1*

Many of the CDPs in Stanislaus County are clustered around the incorporated cities, particularly Modesto and Ceres, as these areas are in close proximity to jobs, public infrastructure, and other services. For the purpose of this analysis, several concentrated geographical areas of the unincorporated county are grouped together to describe areas that share similar characteristics and similar access to services and opportunities. These areas are referred to as South Modesto, West Modesto, and North Ceres areas, as shown in Figure 3-2, Figure 3-3, and Figure 3-4.The South Modesto area includes the CDPs of Bret Harte, Parklawn, and the Riverdale Park Tract. The West Modesto Area includes the Rouse CDP and the portion of the West Modesto CDP located east of Carpenter Road. The North Ceres Area includes the Bystrom CDP.

Figure 3-1 Stanislaus County Cities and CDPs

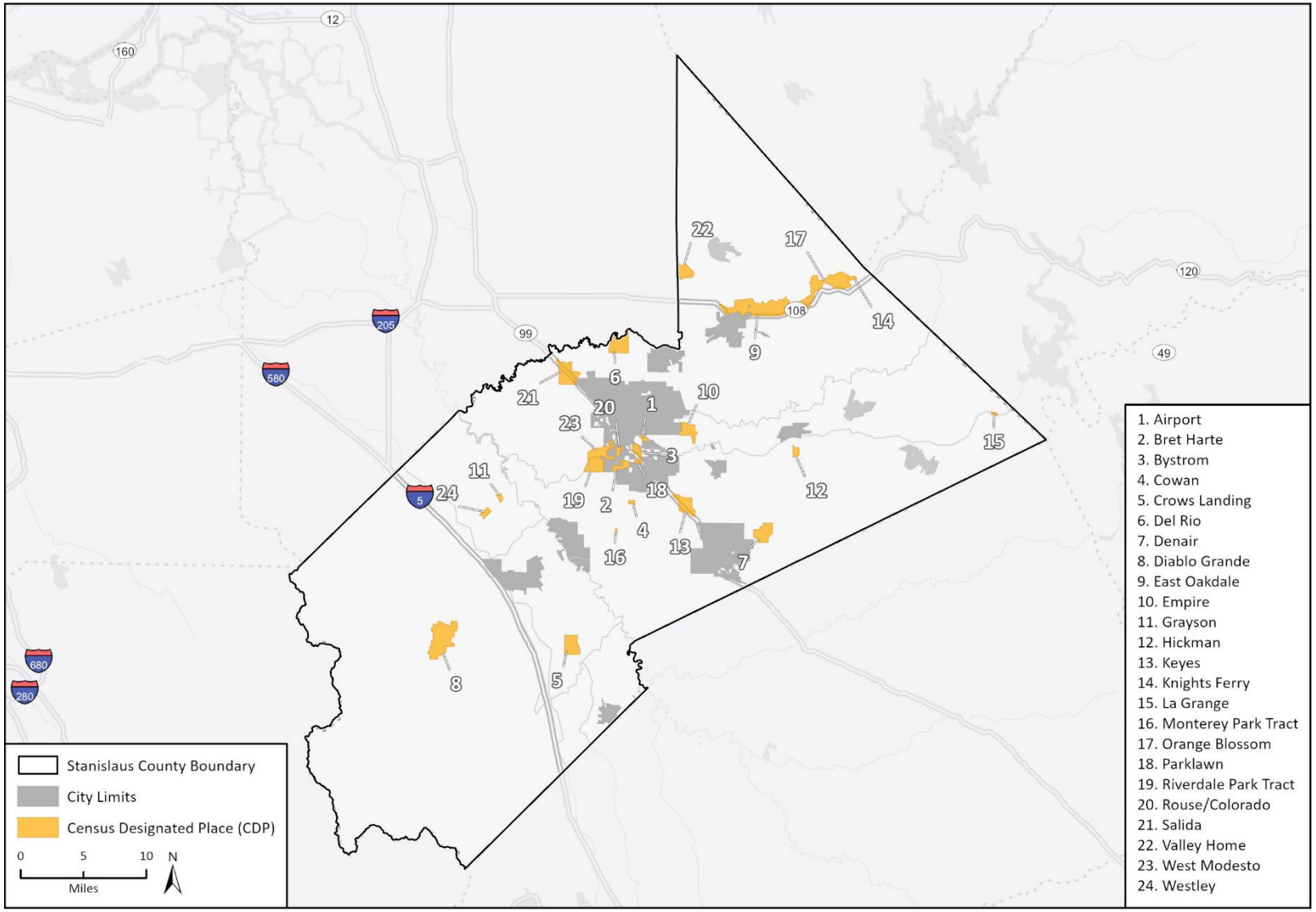
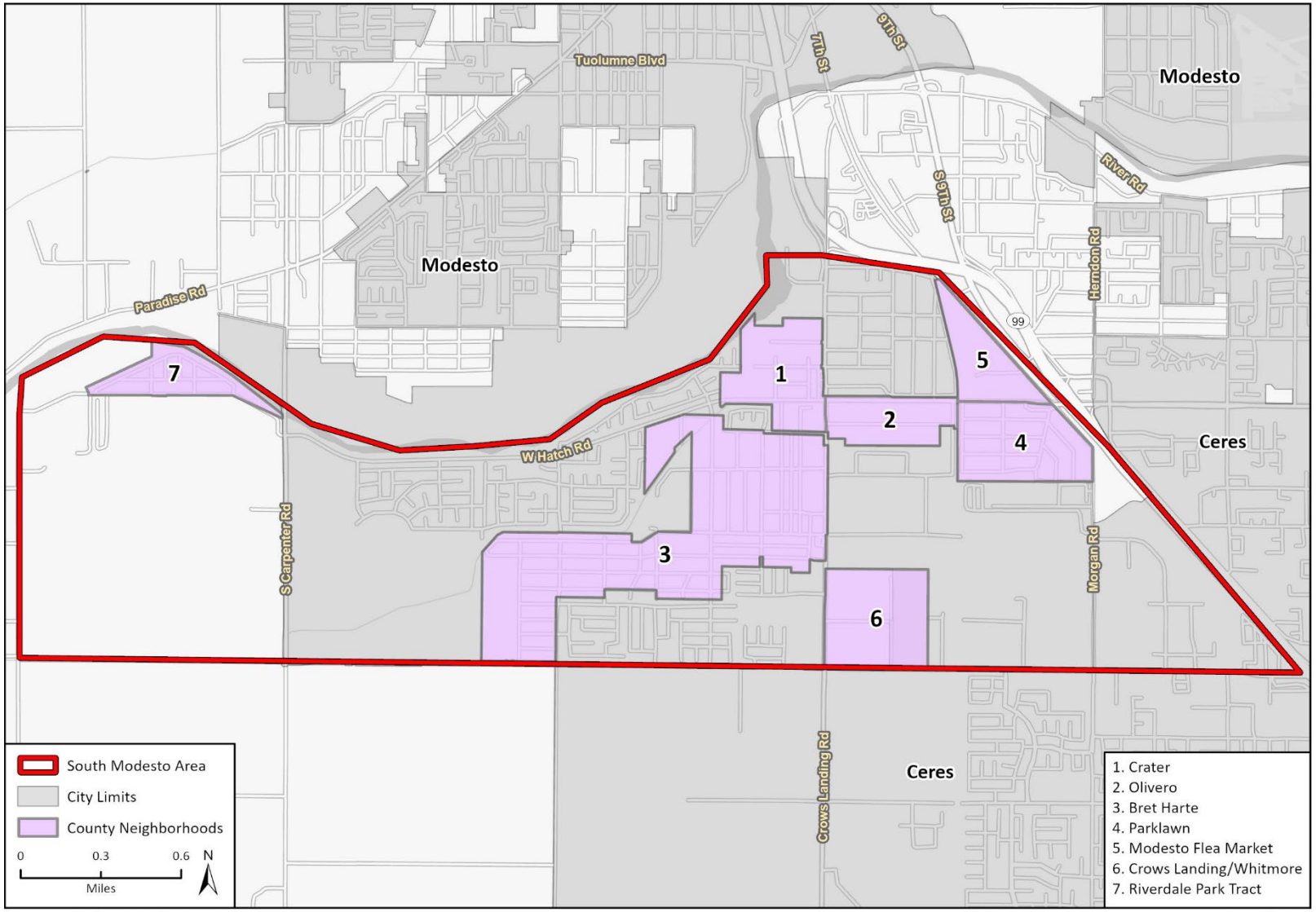


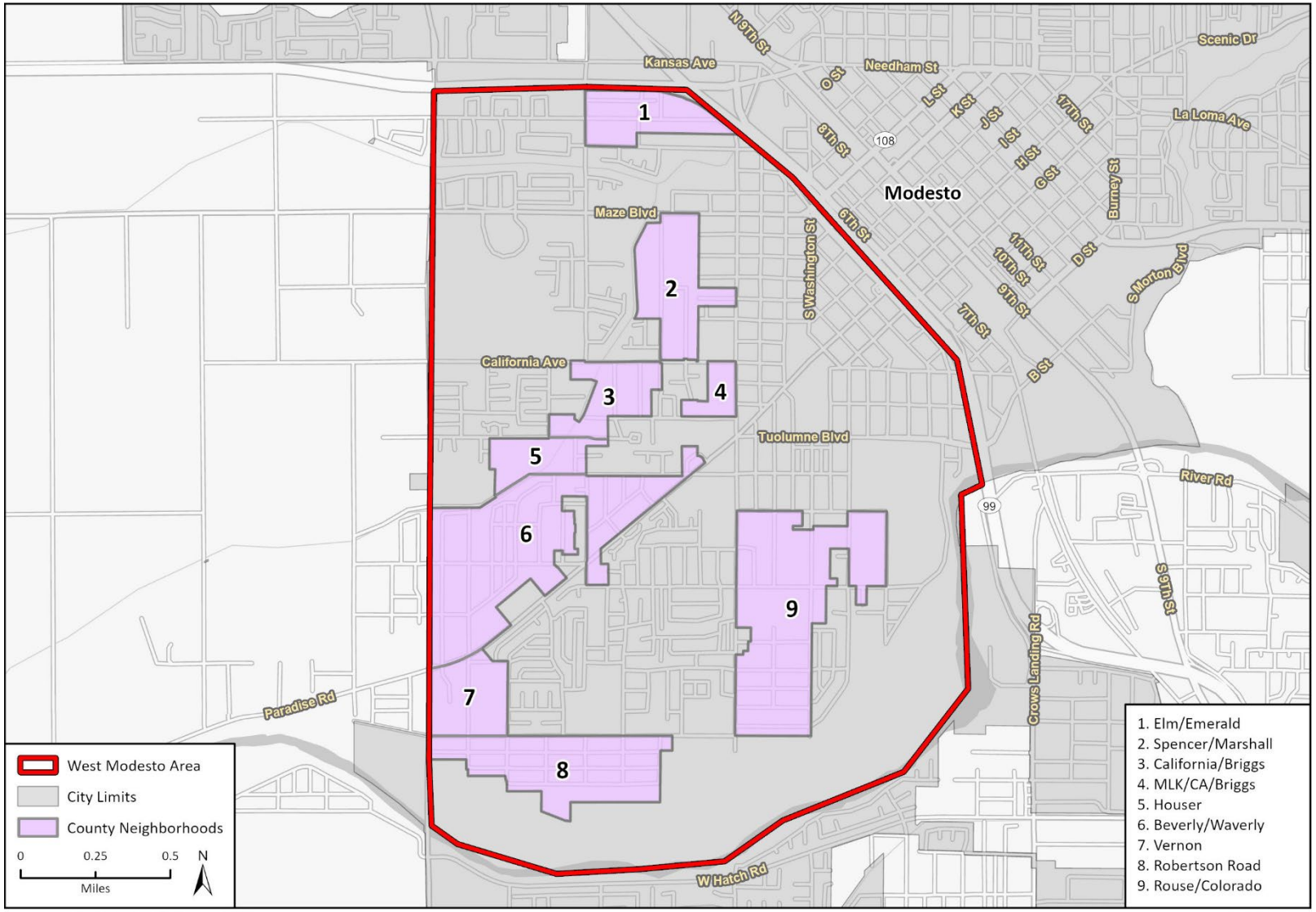
Figure 3-2 South Modesto Area



Basemap provided by Esri and its licensors, 2024.
Additional data provided by County of Stanislaus, 2024.

21_12095_HE_AFFH
Fig X South Modesto Area

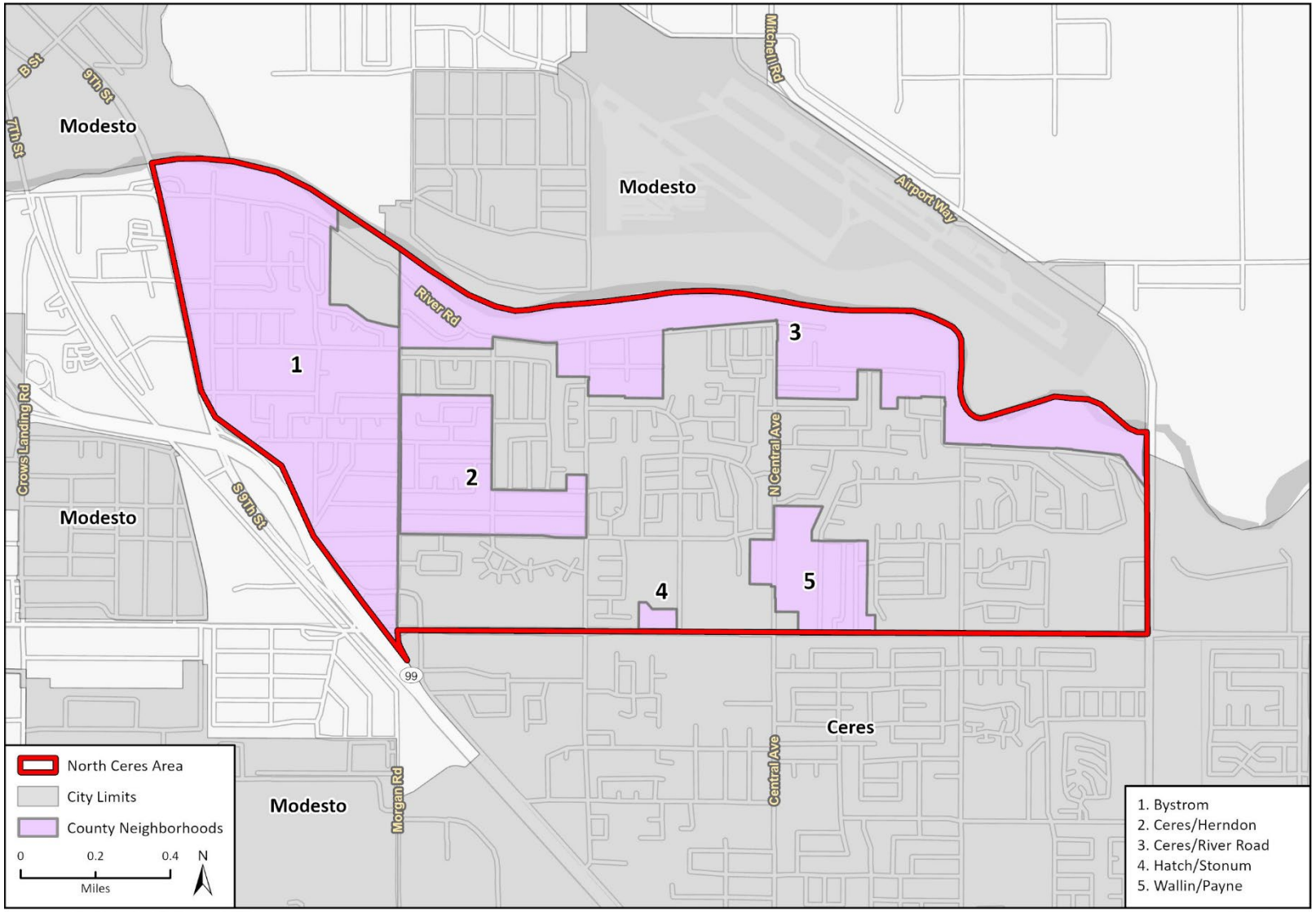
Figure 3-3 West Modesto Area



Basemap provided by Esri and its licensors, 2024.
Additional data provided by County of Stanislaus, 2024.

21_12095_HE_AFFH
Fig X West Modesto Area

Figure 3-4 North Ceres Area



Basemap provided by Esri and its licensors, 2024.
Additional data provided by County of Stanislaus, 2024.

21_12095_HE_AFFH
Fig X North Ceres Area

3.2 Regional Analysis

The Public Policy Institute of California (PPIC) is a nonpartisan organization dedicated to informing and improving public policy in California. In 2004, the PPIC published a policy report analyzing migration trends to, from, and within the Central Valley and the implications of those trends. This policy paper, "The Central Valley at a Crossroads: Migration and its Implications"[1], identifies factors that drive migration, including economic, educational, and social factors. These factors differ dramatically throughout the Central Valley; therefore, the policy paper identifies four subregions of the valley: Upper Sacramento Valley, Sacramento Metro, Northern San Joaquin Valley, and Southern San Joaquin Valley. These four subregions are shown on the inset map of California in Figure 3-5. This AFFH analysis compares Stanislaus County to the broader Northern San Joaquin Valley Subregion comprised of San Joaquin, Stanislaus, and Merced counties, shown in Figure 3-5.

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

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

3.3 Fair Housing Methodology

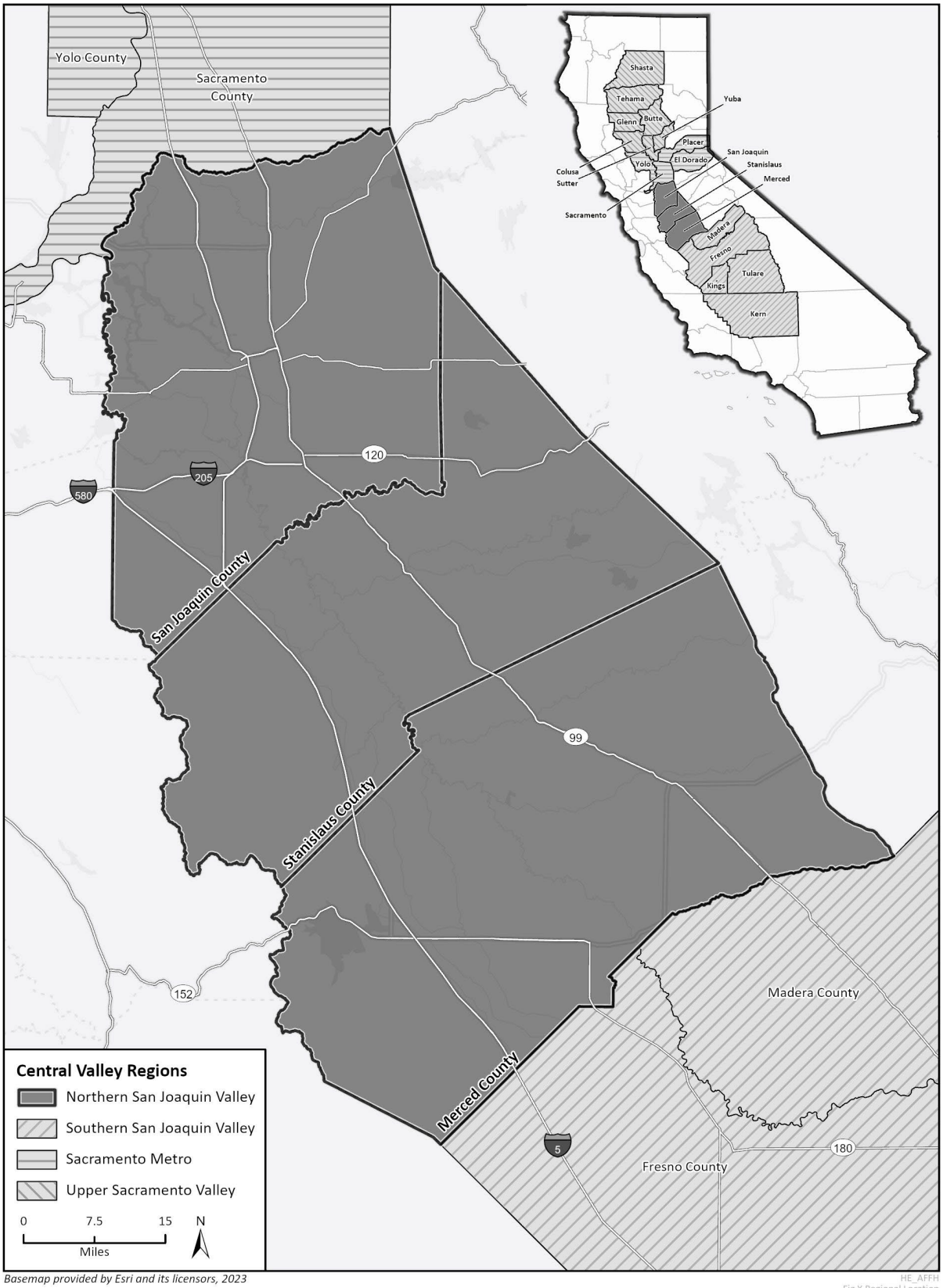
This assessment has been prepared consistent with the California Department of Housing and Community Development (HCD) Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance Memo) which provides guidance on the preparation of housing elements and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

3.3.1 Data Sources

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

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

Figure 3-5 Northern San Joaquin Valley Region



Basemap provided by Esri and its licensors, 2023

HE_AFFH
Fig X Regional Location

Housing and Community Development's AFFH Data Viewer

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

Urban Displacement Project (UDP)

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

CalEnviroScreen

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

California Tax Credit Allocation Committee (TCAC)

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

[2] Office of The State Treasurer (STO). 2021. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf
[3] California Fair Housing Task Force 2022 Opportunity Maps. https://belonging.berkeley.edu/2022-tcac-opportunity-map

AllTransit

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

Comprehensive Housing Report for the San Joaquin Valley

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

The study concluded that while the region has become more diverse in the past few decades, there are disparities in income, poverty, and homeownership among racial and ethnic groups. Stakeholder interviews provided insight into trends and challenges in housing affordability, and also provided a list of opportunity areas for affordable housing. This input is discussed in Section 3.13.3.

Stanislaus County Regional Analysis of Impediments to Fair Housing

The Regional Analysis of Impediments to Fair Housing Choice (AI) was prepared in 2020[4] to fulfill federal fair housing planning requirements. The AI provides a demographic profile of Stanislaus County, both incorporated and unincorporated, to assess the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents. The AI addresses disparities in housing needs, existing patterns of segregation and racially/ethnically concentrated areas of poverty (R/ECAPs) and contributing factors to fair housing impediments.

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

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

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

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

Stanislaus County Disadvantaged Unincorporated Communities Report

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

Community Engagement

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

For a more detailed discussion of community engagement, see Section 3.13.3

3.4 Fair Housing Resources

3.4.1 Enforcement and Outreach Capacity

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

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

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

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

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

Stanislaus County partners with Project Sentinel to conduct fair housing testing. In 2015 to 2016, Project Sentinel conducted four fair housing tests in Newman, Ceres, Oakdale, and Valley Home in response to allegations or claims of practices that may have violated fair housing law. The tests identified evidence of a violation of reasonable accommodation for service/assistance animals for persons with a disability in Oakdale and Newman. Project Sentinel has not conducted any fair housing tests within the past several years.

Fair Housing Resources

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

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

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

Table 3-2 Fair Housing Organizations Active in Stanislaus County

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

3.4.2 Compliance with Fair Housing Laws

The County complies with the following State and federal fair housing laws:

- Fair Housing Act; Title VI of the Civil Rights Act of 1964: The County complies by ensuring its actions related to housing are not discriminatory through County protocols, decision-making procedures, and adhering to non-discrimination requirements of federal funding programs.
- American Disabilities Act (ADA): The County complies with the ADA through building permit review and issuance and as described in Chapter 4, Housing Constraints, *Section 4.1.11 Development, Maintenance, and Improvement of Housing for Persons with Disabilities*.
- California Fair Employment and Housing Act (FEHA) and FEHA Regulations: The County complies through established County protocols for hiring and decision making, mandatory trainings for County staff, and legal counsel and advisement.
- Rehabilitation Act of 1973 (see also Fair Housing Act): The County complies through its accessibility protocols, administered and enforced by the County ADA Title II and Civil Rights Title VI Coordinator and ADA/Civil Rights Liaison for each County department and agency.
- Government Code Section 65008: The County ensures that the County's actions are not discriminatory through training programs conducted by the County's Human Resources Department. Programs are included in this Housing Element to facilitate housing for all households, including protected classes (e.g., programs regarding residential care facilities, reasonable accommodation, and emergency shelters).
- Government Code Section 8899.50: Chapter 3 of this Housing Element documents compliance with Affirmatively Furthering Fair Housing requirements.
- Government Code Section 11135 et seq.: The County complies with anti-discrimination requirements through the County's Human Resources programs and the County's procurement protocols.
- Density Bonus Law (Government Code Section 65915): The County must update its density bonus provisions in compliance with the State Density Bonus Law as described in Chapter 4, Housing Constraints and Program 2.2a.
- Housing Accountability Act (Government Code Section 65589.5: The County has documented compliance with the HAA as described in Chapter 3, Housing Constraints.
- No-Net-Loss Law (Government Code Section 65863): The County has documented compliance with sufficient capacity for RHNA and will ensure compliance with no net loss via programs (Program 3.2).

- Least Cost Zoning Law (Government Code Section 65913.1): The County includes programs in this Housing Element to ensure that sufficient land is zoned with appropriate standards to accommodate its share of the RHNA.
- Excessive subdivision standards (Government Code Section 65913.2): The County's subdivision standards are typical or not excessive in compliance with the Government Code (see Chapter 4 Constraints, section *Governmental Constraints*).
- Limits on growth control (Government Code Section 65302.8): While the County's growth management measure (Measure E) requires that redesignation or rezoning of land in the unincorporated area from agricultural or open space use to residential use must be approved by a majority vote of the County voters at a general or special local election, Measure E provides some exceptions to support affordable housing development. In addition, Program 3.1f requires the County to evaluate Measure E on a bi-annual basis and to identify opportunities to incentivize housing if Measure E is found to be a constraint to housing development. This ensures that there are no limits on growth control that would discourage housing development in the County.

3.4.3 Ability to Address Complaints

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

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

Between 2013 and 2021, 10 FHEO inquiries were received in Stanislaus County. While these inquiries were not pursued by the residents and are not considered official cases, they identify concerns about possible discrimination. As shown in Figure 3-6, less than 0.5 inquiries have been made per one thousand people in Stanislaus County. Oakdale and North Modesto are the two areas within the County where inquiries are more common.

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

3.4.4 Findings, Lawsuits, Enforcement Actions, Settlements or Judgments

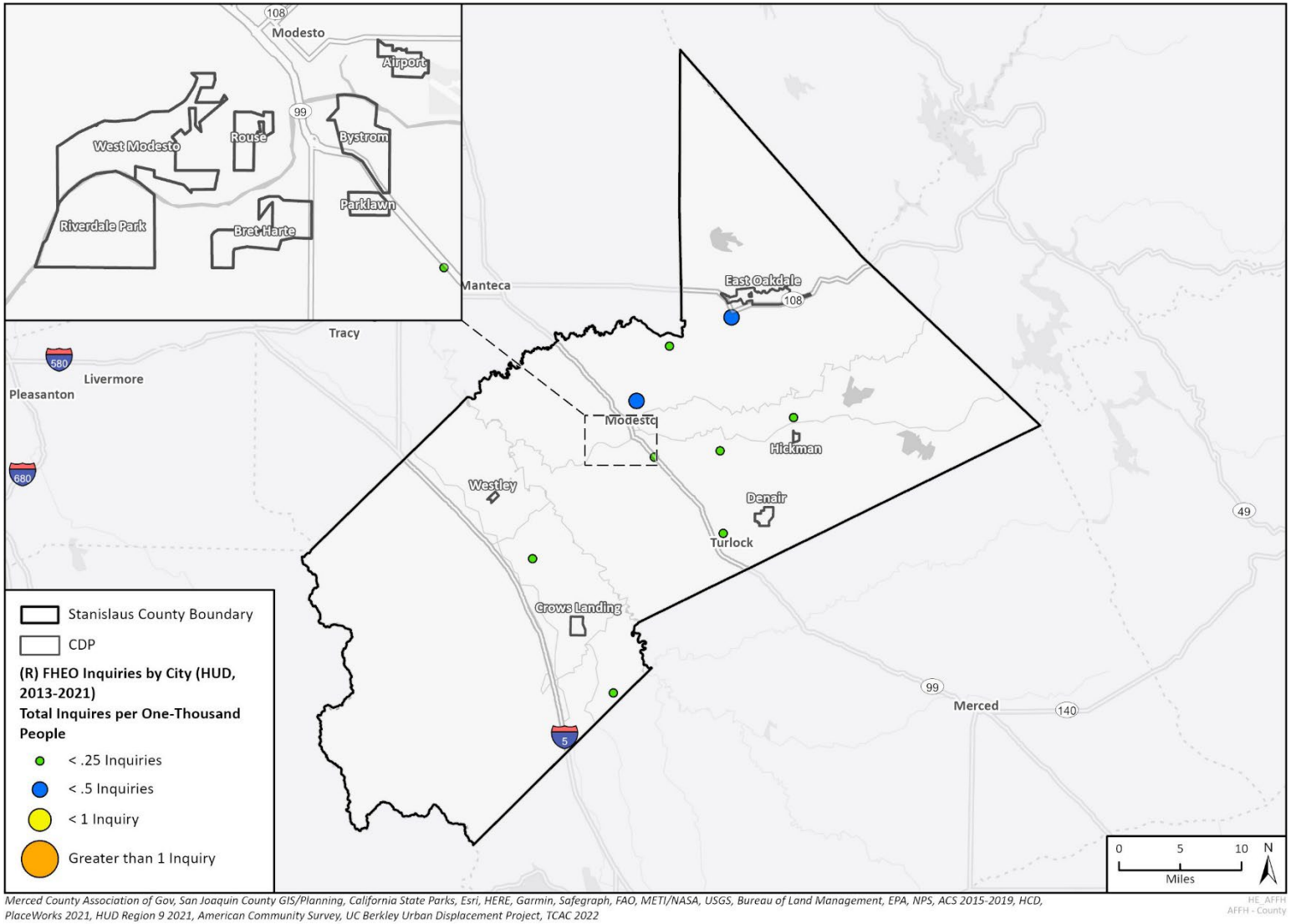
There have been two legal agreements over the last 30 years focused on residential development in unincorporated Stanislaus County.

The Low to Moderate Income (LMI) Housing Fund/1991 CRLA agreement, entered into between the Stanislaus County Redevelopment Agency (RDA) and California Rural Legal Assistance (CRLA) on November 15, 1991, required the RDA to: (1) set aside and expend at least twenty-five percent (25 percent) of gross tax increment revenue generated from property within the redevelopment area to expand and improve the supply of affordable housing; (2) prepare a Community Plan for the Airport, Shackleford, South 7th Street, and Butte/Glenn/Imperial neighborhoods; (3) ensure replacement housing and relocation assistance is provided in the Airport and South 7th Street neighborhoods when tenants are required to relocate due to private or public development activity and require noticing to any tenant within in the Airport and South 7th Street neighborhoods and CRLA when a project proposes to destroy low or very low income housing units (this applies to RDA and Stanislaus County development applications); (4) make all legally required reports available to CRLA; and (5) include affordability and occupancy restrictions on low- and very-low income housing developed with RDA funding. The Stanislaus County Redevelopment Agency was dissolved in 2012, as mandated under state law.

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

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

Figure 3-6 FHEO Inquiries in Stanislaus County by City, 2013-2021



Source: AFFH Data Viewer

3.5 Segregation and Integration Patterns and Trends

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

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

> Residential segregation and exclusion, whether by race, ethnicity, disability, or income, is a result of numerous housing policies, practices, and procedures—both public and private—that have had enduring and pervasive negative impacts. Overt and covert housing discrimination through land use policy, shifting housing markets, and patterns of investment and disinvestment, have restricted meaningful fair housing choice and equitable access to opportunity, particularly for communities of color.
>
> Historic patterns of segregation persist in California despite the long-standing federal mandate, established by the Fair Housing Act of 1968 (FHA), that federal agencies and federal grantees affirmatively further the purposes of the FHA. Past and present discriminatory policies and practices, including long-term disinvestment, have resulted in neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems.
>
> In addition, governmental policies have subsidized the development of segregated, High Resource suburbs in metropolitan areas by constructing new highway systems—often through lower income communities of color — to ensure access to job opportunities in urban centers. This physical and policy infrastructure supports patterns of discrimination and high levels of segregation that continue to persist in California and across the country. All of these conditions persist despite the over 50-year-old obligation to prohibit discrimination and affirmatively further fair housing.[5]

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

3.6 Race and Ethnicity

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

Local Trends

There are few areas of concentrated population by race/ethnicity in Stanislaus County. In 2020, non-white residents comprised more than 60 percent of the County's population.[6] In comparing the percent of total non-white population between 2010-2018 (shown in Figure 3-7 and Figure 3-8), the overall population of non-white residents in the County has increased in the last decade. The distribution of white and Hispanic majority census tracts is nearly split along Highway 99. The predominantly white population of the County is located east of Highway 99, specifically in the northeastern areas of the County such as East Oakdale and Hickman (Figure 3-9). In contrast, the County's predominantly Hispanic population live west of Highway 99 and are more densely located in the CDPs in South Modesto (Figure 3-10).

Most CDPs in Stanislaus County have a high percentage of Hispanic/Latino residents, equal to or greater than the percent of Hispanic/Latino residents in the County overall (47 percent) (Table 3-3). Several CDPs have a lower percentage of Hispanic/Latino residents compared to the County, particularly CDPs located within the northeastern part of the County. These CDPs have a majority of non-Hispanic/Latino white residents, including Del Rio, Diablo Grande, East Oakdale, Knights Ferry, La Grange, and Orange Blossom. Similar to Stanislaus County overall, the percent of Black/African, American Indian/Alaskan Native, and Some Other Race/Two or More Races residents is low, generally less than two percent for most CDPs. The percent of residents that are Asian American/Pacific Islander is slightly higher, ranging between zero and 16 percent in the CDPs. CDPs with the highest percentage of American/Pacific Islander residents are concentrated near the city of Modesto and include Bystrom, Cowan Tract, Del Rio, Diablo Grande, Riverdale Park Tract, and Salida.

Table 3-3 Racial/Ethnic by Census Designated Place

		Non-Hispanic/Latino				
	Hispanic/ Latino	White	Black/ African American	American Indian/ Alaskan Native	Asian American/ Pacific Islander	Some Other Race/Two or More Races
Stanislaus County	46.9%	40.8%	2.9%	0.4%	6.3%	2.7%
CDP						
Airport	76.6%	21.6%	1.2%	0.0%	0.0%	0.7%
Bret Harte*	88.6%	10.7%	0.0%	0.0%	0.0%	0.7%
Bystrom**	76.4%	11.6%	0.1%	0.0%	8.5%	3.5%
Cowan Tract	57.2%	27.8%	0.0%	0.0%	9.5%	5.5%
Crows Landing	82.1%	17.9%	0.0%	0.0%	0.0%	0.0%

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

	Hispanic/ Latino	Non-Hispanic/Latino				
		White	Black/ African American	American Indian/ Alaskan Native	Asian American/ Pacific Islander	Some Other Race/Two or More Races
Del Rio	20.9%	59.7%	0.0%	0.0%	16.1%	3.3%
Denair	43.3%	52.3%	0.3%	0.0%	3.6%	0.5%
Diablo Grande	25.8%	57.1%	8.0%	0.0%	8.1%	1.0%
East Oakdale	0.7%	90.5%	0.0%	0.0%	7.9%	1.0%
Empire	66.4%	27.5%	1.1%	1.0%	0.0%	4.1%
Grayson	96.6%	2.1%	1.3%	0.0%	0.0%	0.0%
Hickman	35.2%	61.7%	0.0%	0.0%	1.6%	1.6%
Keyes	75.3%	20.8%	0.7%	0.0%	0.7%	2.6%
Knights Ferry	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%
La Grange	28.0%	62.2%	0.0%	0.0%	0.0%	9.8%
Monterey Park Tract	87.0%	9.6%	0.0%	3.4%	0.0%	0.0%
Orange Blossom	22.4%	77.0%	0.0%	0.0%	0.3%	0.3%
Parklawn*	95.8%	4.0%	0.0%	0.2%	0.0%	0.0%
Riverdale Park Tract*	85.4%	6.1%	0.0%	0.0%	8.5%	0.0%
Rouse/Colorado***	74.6%	10.2%	6.4%	0.0%	5.9%	2.9%
Salida	53.3%	35.9%	0.6%	0.0%	8.6%	1.7%
Valley Home	28.7%	68.4%	0.0%	0.0%	2.9%	0.0%
Westly	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%
West Modesto***	70.8%	21.2%	1.9%	0.0%	5.1%	1.0%

* The Bret Harte, Parklawn, and Riverdale Park Tract CDPs are located in the South Modesto area.

** The Bystrom CDP is located in the North Ceres area.

*** The Rouse CDP is located in the West Modesto area. The West Modesto CDP is made up of multiple neighborhoods.

Source: ACS Data 2020 5 year Estimates, Table DP05

HUD utilizes the racial/ethnic dissimilarity index as a measure of segregation. The racial/ethnic dissimilarity index represents the extent of which any two racial/ethnic groups differ across a defined geographical area. The index ranges from 0-100, where 0 represents perfect integration between the two racial/ethnic groups and 100 representing perfect segregation. An index value below 40 is generally considered low segregation, a value between 40 and 54 is considered a moderate level of segregation, and a value above 55 is a high level of segregation.[7] Racial/ethnic segregation in Stanislaus County increased among all measured racial/ethnic groups between 2010 and 2020 (Table 3-4). Segregation is highest between Black and white residents and between Asian/Pacific Islander and white residents. These groups are considered moderately segregated, with index scores between 40 and 54. Segregation between Hispanic and white residents and between all non-white and white residents is low, with index scores below 40.

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

Table 3-4 Racial/Ethnic Dissimilarity Trends in Stanislaus County

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

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

According to the University of California, Berkeley's Othering and Belonging Institute, people of color (POC) are highly segregated in several census tracts within and surrounding the southern part of the City of Modesto and the City of Ceres (Figure 3-11). White residents are highly segregated in the northeastern part of the County, including in East Oakdale, Valley Home, and Knights Ferry. The cities of Modesto and Turlock and rural areas in central and western parts of the County have a mix of low- to medium-segregation areas and well-integrated areas. While most of the unincorporated County is well-integrated or has low to medium levels of segregation. Areas with most of the high POC segregation are located in unincorporated parts of the County just outside the City of Modesto, including the CDPs of West Modesto, Bystrom, and Bret Harte.

Regional Comparison

Stanislaus County is similar to the other counties in the Northern San Joaquin Valley in terms of racial/ethnic composition. Within each County, the areas with the highest percentage of non-white residents (greater than 81 percent) are located near major cities and along major highways, including in and near the cities of Modesto, Patterson, and Turlock, and the CDPs of West Modesto (Rouse/Colorado neighborhood), Riverdale Park Tract, Bret Harte, Parklawn, Bystrom, and Airport, as shown in Figure 3-12. In contrast, in CDPs in the eastern part of the County, including Denair, East Oakdale, Knights Ferry, and Valley Home, less than 40 percent of residents are non-white.

Patterns of racial/ethnic segregation and integration are similar in Stanislaus County and other counties in the Northern San Joaquin Valley (Figure 3-13). All three counties in the Northern San Joaquin Valley have a mix of low- to medium-segregation areas, well-integrated areas, and areas of white segregation. Well-integrated areas are generally located in the central parts of each County, within and adjacent to urban areas, while areas with high white segregation are in rural, western parts of each County. Areas with high POC segregation are generally located in urban areas, particularly in the cities of Stockton, Lodi, and Modesto.

Figure 3-7 Percent of Total Non-White Population in 2010 by Block Group, Stanislaus County

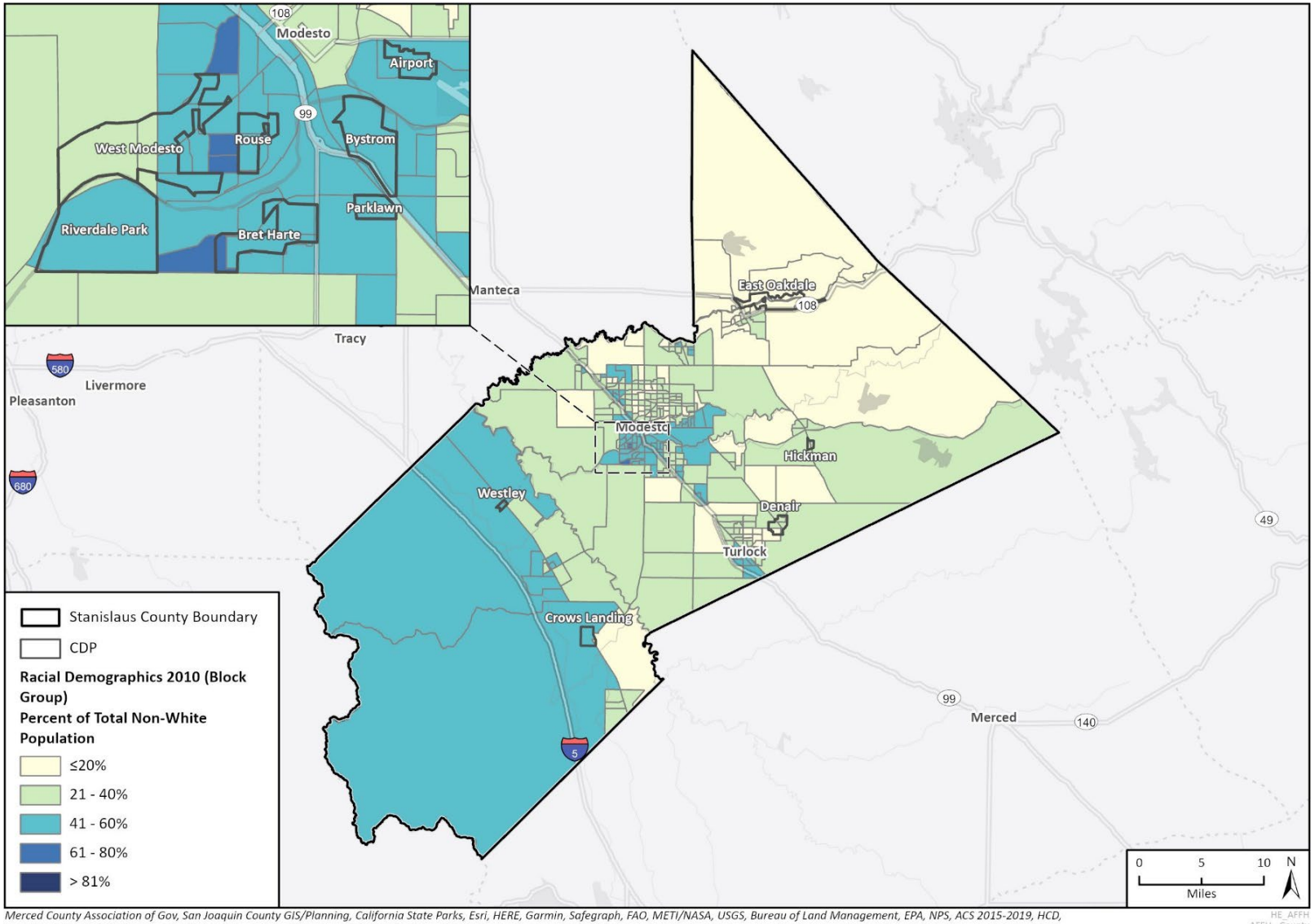
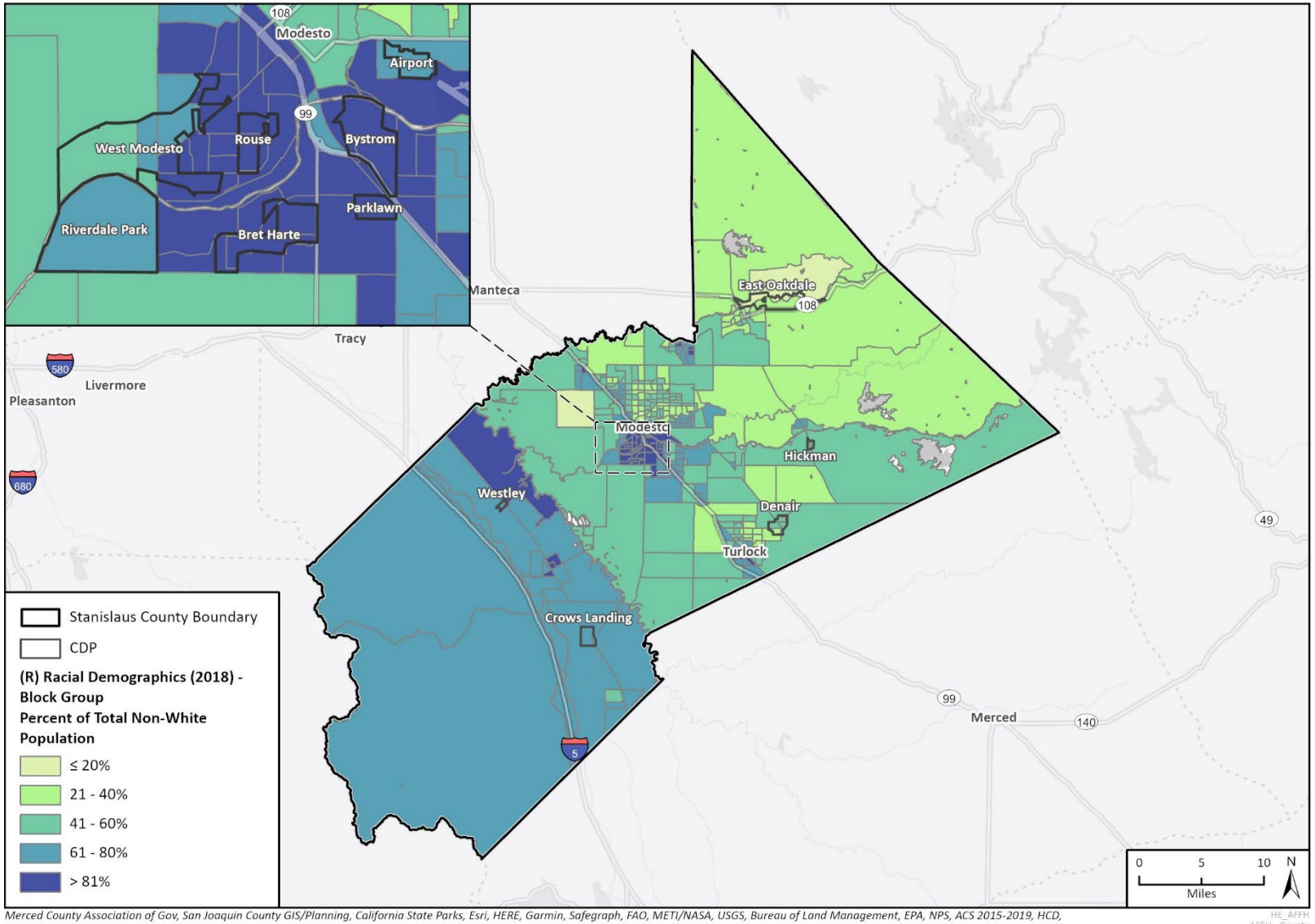


Figure 3-8 Percent of Total Non-White Population in 2018 by Block Group, Stanislaus County



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

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Figure 3-9 2018 White Majority Tracts, Stanislaus County

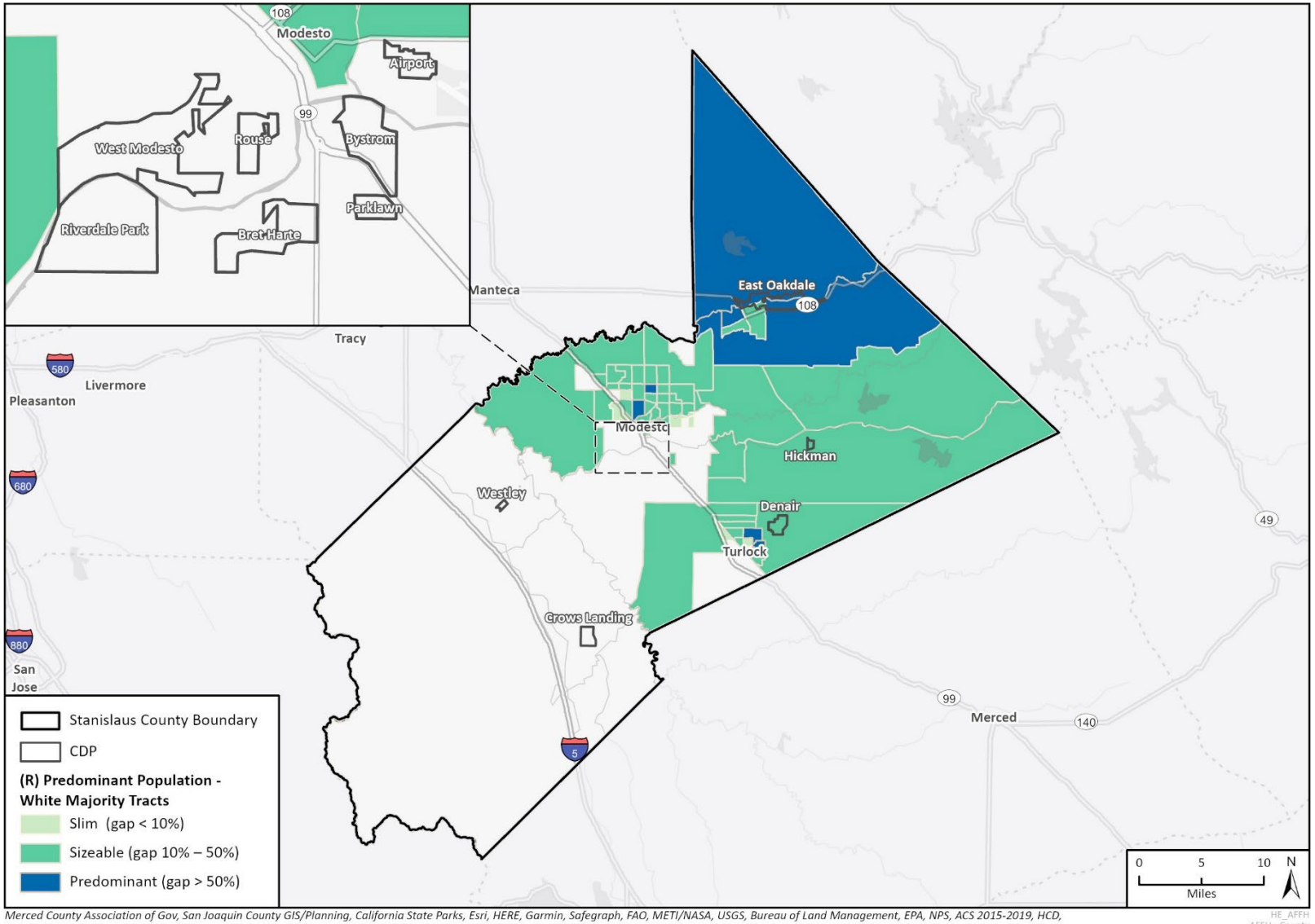

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Figure 3-10 2018 Hispanic Majority Tracts, Stanislaus County

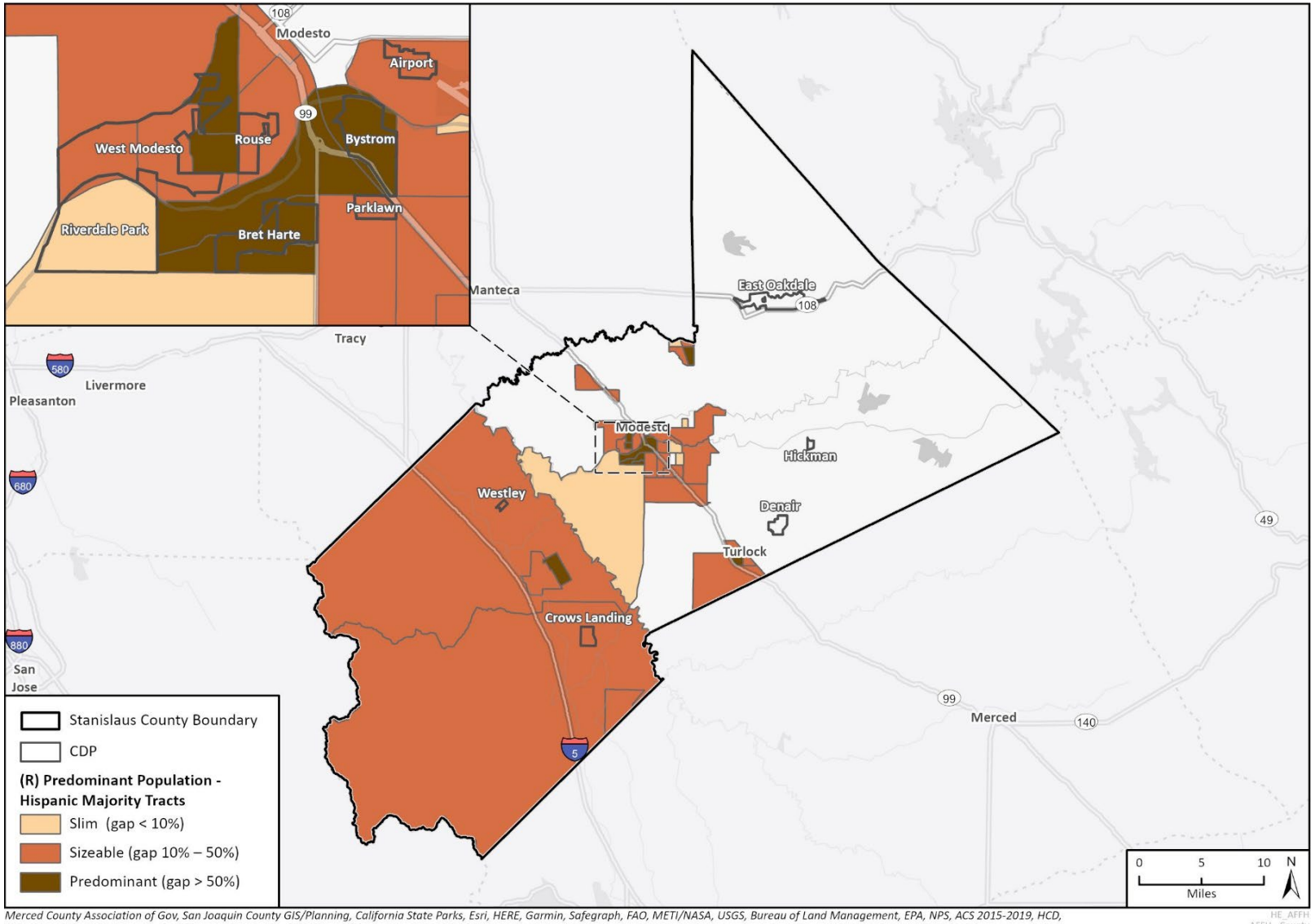

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Figure 3-11 Racial Segregation and Integration, Stanislaus County

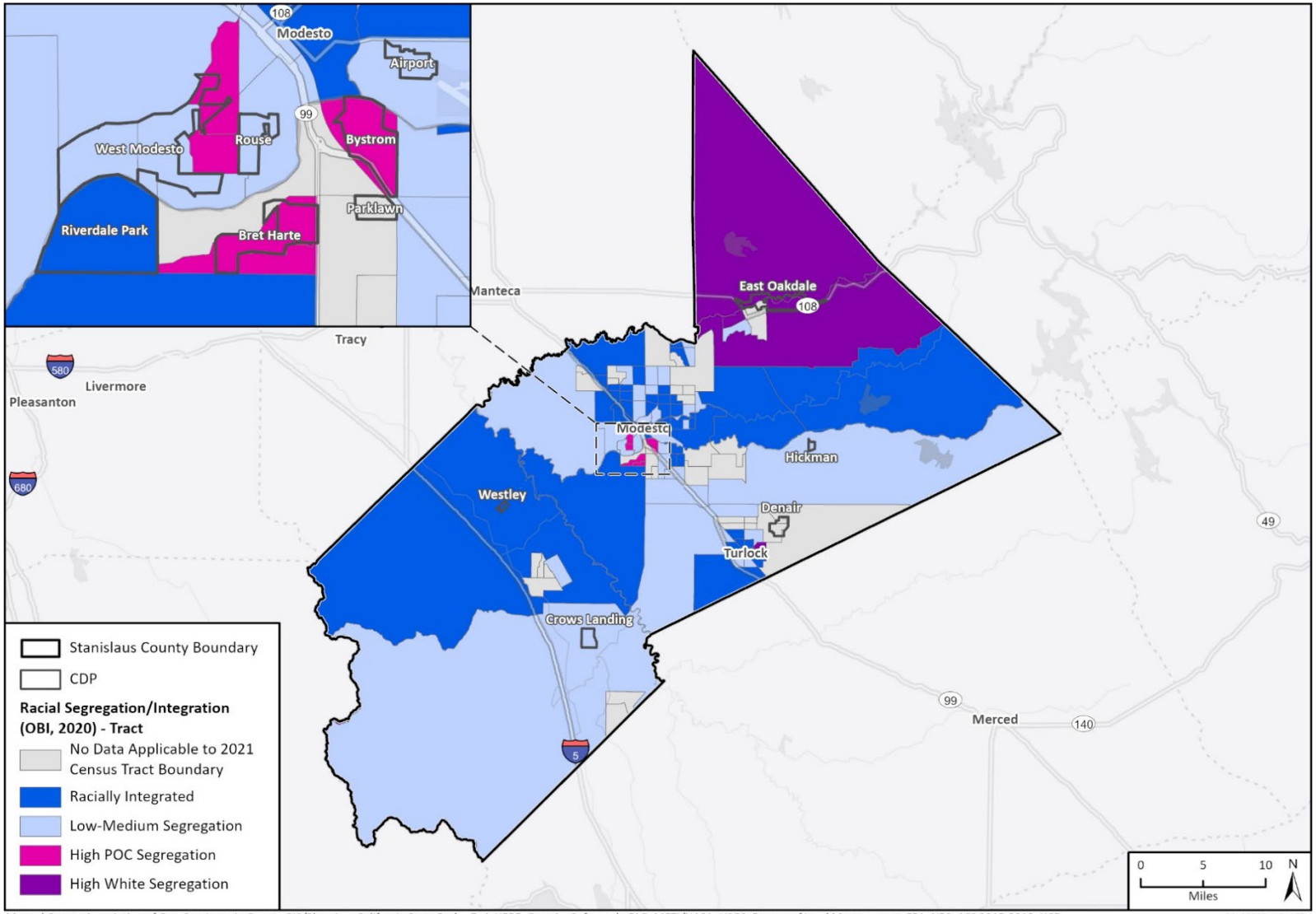

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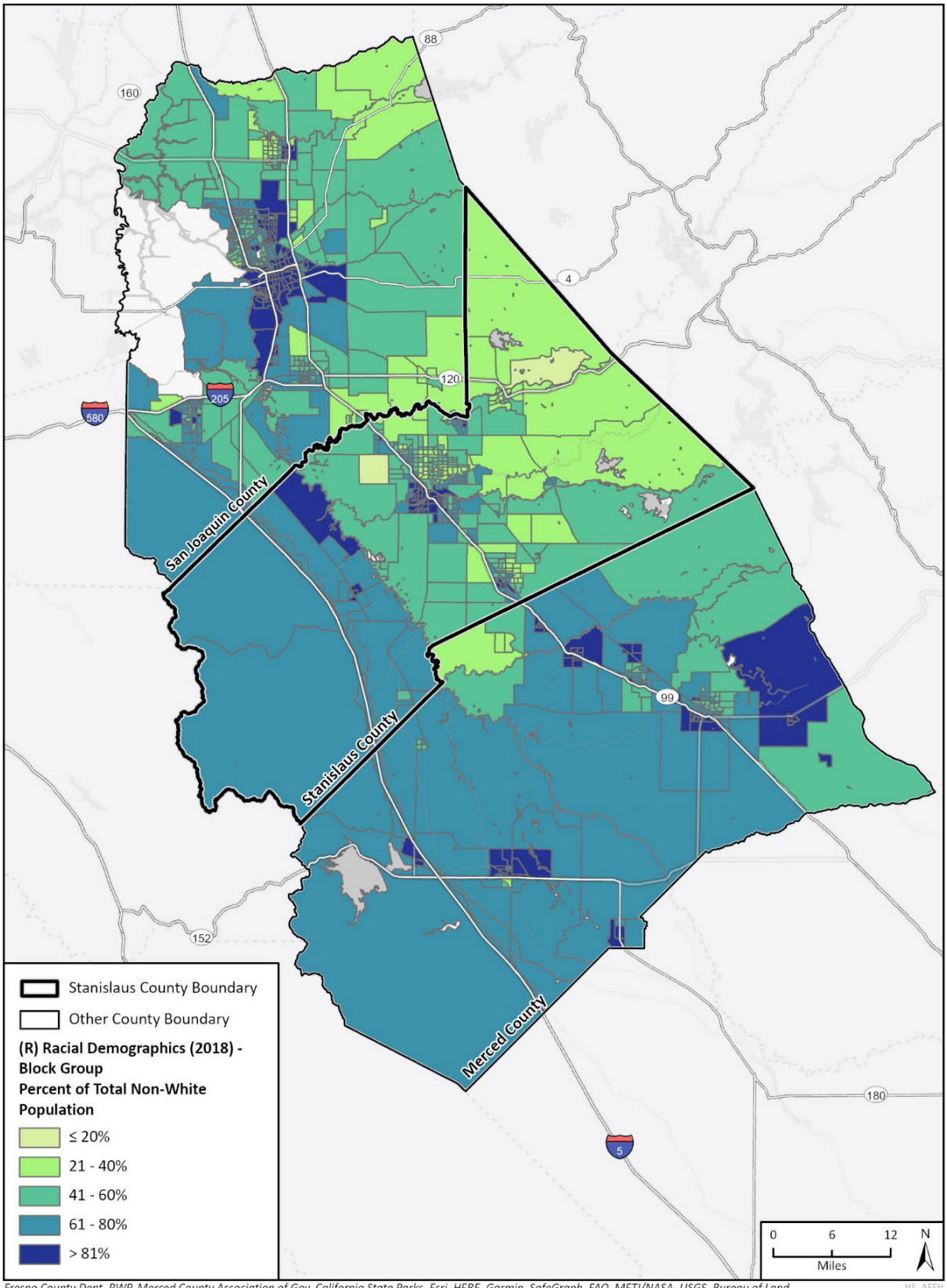
Figure 3-12 Percentage of 2018 Population that is Non-White by Block Group, Region



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

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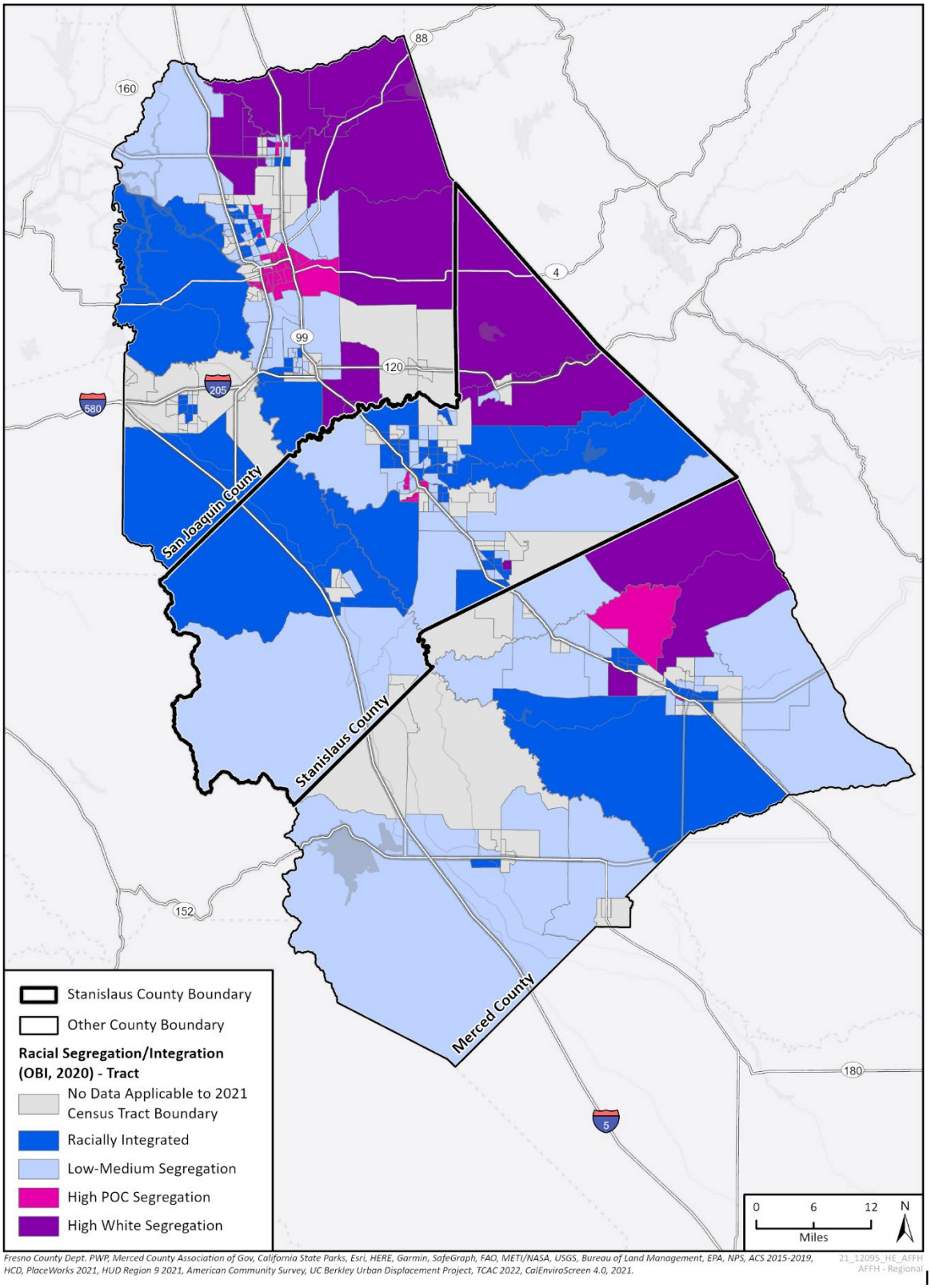
Figure 3-13 Racial Segregation and Integration, Region



3.7 Persons with Disabilities

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

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

Local

As referenced in Chapter 2, Housing Needs Assessment, 85,670 residents (approximately four percent) of Stanislaus County's population live with one or more disabilities. Ambulatory difficulty, defined as having serious difficulty walking or climbing stairs, is the most common disability reported by Stanislaus County residents. From the ACS 2016-2020 data, 33 percent of individuals with a disability were unemployed, as seen below in Table 3-5. The unemployment rate of residents with a disability has stayed relatively unchanged in the past decade.

The highest percentage of the unincorporated County's population living with a disability can be found in the CDP of West Modesto, as shown in Figure 3-14. In West Modesto, 20 percent of the population has a disability. The CDPs of Airport, Rouse/Colorado, and Valley Home also have a high percentage of residents with a disability, ranging from 17 to 19 percent. The remaining CDPs have lower disability rates, 12 percent and below. Areas in the County with a higher rate of individuals with a disability overlap with a further proximity to jobs, as well as a low transit score (less connectivity and transit services).

Table 3-5 Disability in Stanislaus County

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

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

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

[8] HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf
[9] The Rehabilitation Research and Training Center on Disability Statistics and Demographics 2020. https://disabilitycompendium.org/annualreport

Regional Comparison

Stanislaus County has a similar distribution of population living with a disability to the Northern San Joaquin Valley. In the region, approximately 12.5 percent of the total population live with one or more disabilities with the most common disability being hearing difficulty[10]. In most of the Northern San Joaquin Valley region, 10 to 20 percent of the population have a disability. Throughout the central part of the region, there are some areas with a lower concentration of persons living with a disability (less than 10 percent of the population. The areas with the highest percentage of individuals with a disability (20 to 30 percent) are located near major cities and along major highways (Figure 3-15).

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

Figure 3-14 Population with a Disability by Census Tract, Stanislaus County

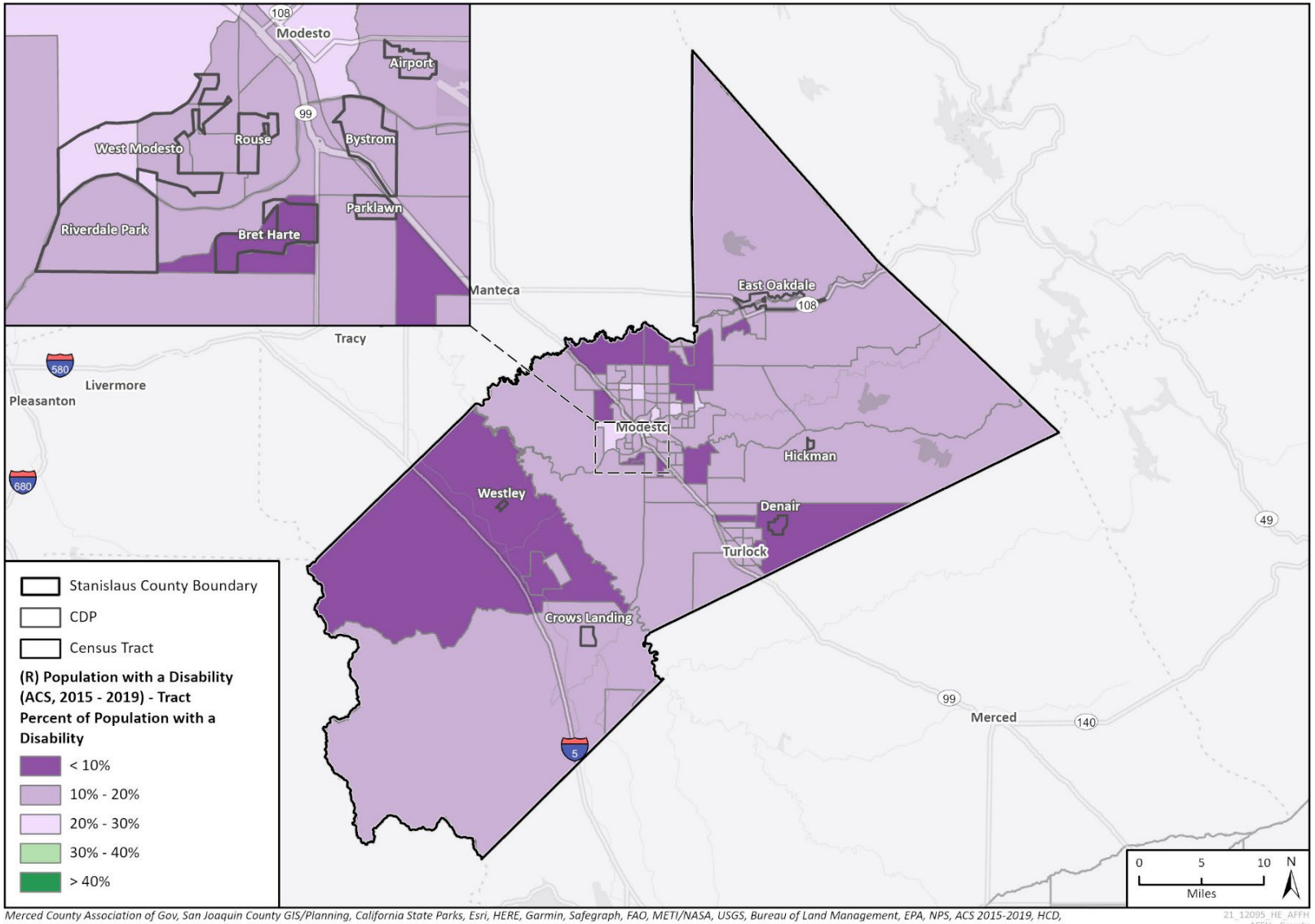


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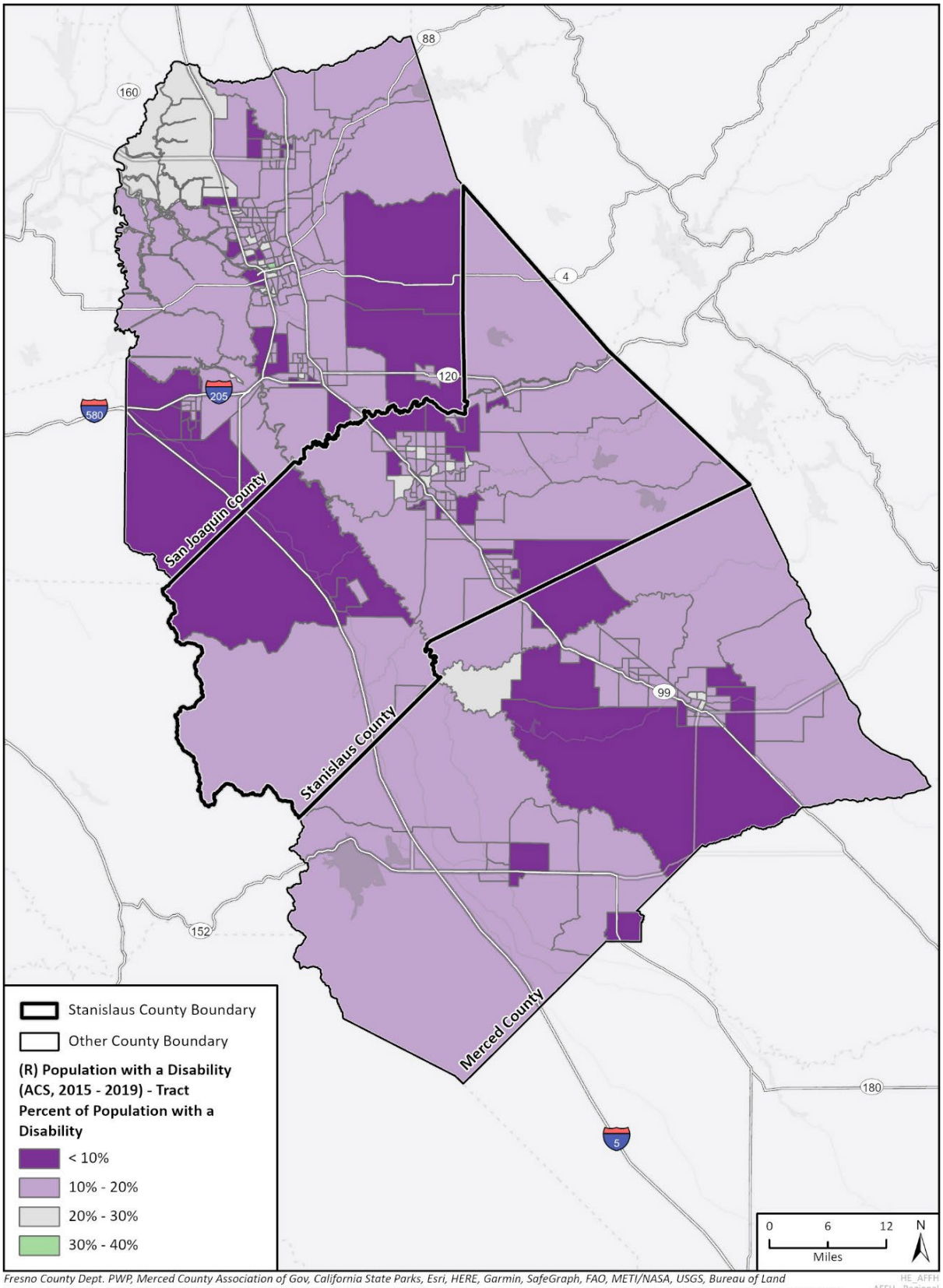
Figure 3-15 Population with a Disability by Census Tract, Region



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

3.8 Familial Status

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

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

Local Trends

Unincorporated Stanislaus County has a higher percentage of children in married-couple households than in female-headed households. Comparing unincorporated Stanislaus County to the County as a whole, the unincorporated County has a slightly higher percentage of households with children present specifically in married-couple households, as Table 3-6 shows. The distribution of married-couple households with children throughout the County is shown in Figure 3-16. The CDPs with the highest percentage of children in a married-couple household are the northeastern CDPs of East Oakdale and La Grange, the northwestern CDPs of Westley and Grayson, and the CDP of Riverdale Park Tract, located near the city of Modesto, in all of which more than 80 percent of children reside in married-couple households. Other CDPs including West Modesto, Rouse/Colorado, Bret Harte, and Crows Landing have some of the lowest percentages of children in married-couple households in the unincorporated County, between 40 and 60 percent.

Female-headed households with no spouse present with children present make up five percent of households in unincorporated Stanislaus County. The CDP of Empire is the area with the highest percentage of female-headed households (40-60 percent of all households), as seen in Figure 3-17. In CDPs throughout the rest of the County, less than 20 percent of children live in female-headed households. Areas with the highest percentage of female-headed households with children are in more urban areas, such as the cities of Modesto and Turlock. Most rural areas of the County have a low percentage of children living in female-headed households, less than 20 percent. Areas with a high percentage of children living in female-headed households overlap with areas that have a lower median household income, higher poverty rates, and higher percentage of renter-occupied housing units.

[11] 42 U.S. Code sections 3601, *et seq*., the Fair Housing Act.
[12] https://www.hud.gov/program_offices/fair_housing_equal_opp/discrimination_against_families_children#_Who_Is_Protected?
[13] U.S. Department of Housing and Urban Development. "Annual Report on Fair Housing FY 2017."

Table 3-6 Household Type and Presence of Children, Stanislaus County

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

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

Additionally, Stanislaus County has a greater portion of large households (five or more persons per household) compared to the state average. Often, large households face significant difficulty in locating adequately sized, affordable housing due to the limited supply of appropriately sized homes. In unincorporated Stanislaus County, 20 percent of households are large households, compared to 13 percent of the state, as shown in Table 3-7.

Table 3-7 Large Households

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

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

Regional Comparison

In comparison to the Northern San Joaquin Valley, Stanislaus County has a similar distribution of children in female-headed households. Most of the region's population consists of 20 percent or less of female-headed households with children. Within the region, the areas with the highest percentage of children present in female-headed households (typically 40 to 60 percent) were located near major cities and along major highways, as Figure 3-18 shows. Areas with a higher percentage of female-headed households regionally overlap with Low Resources and low job proximity. Regionally, concentrations of children in female-headed households are impacted by the availability of affordable units within proximity to jobs, transportation, and resources in these areas.

Figure 3-16 Children in Married-Couple Households by Census Tract, Stanislaus County

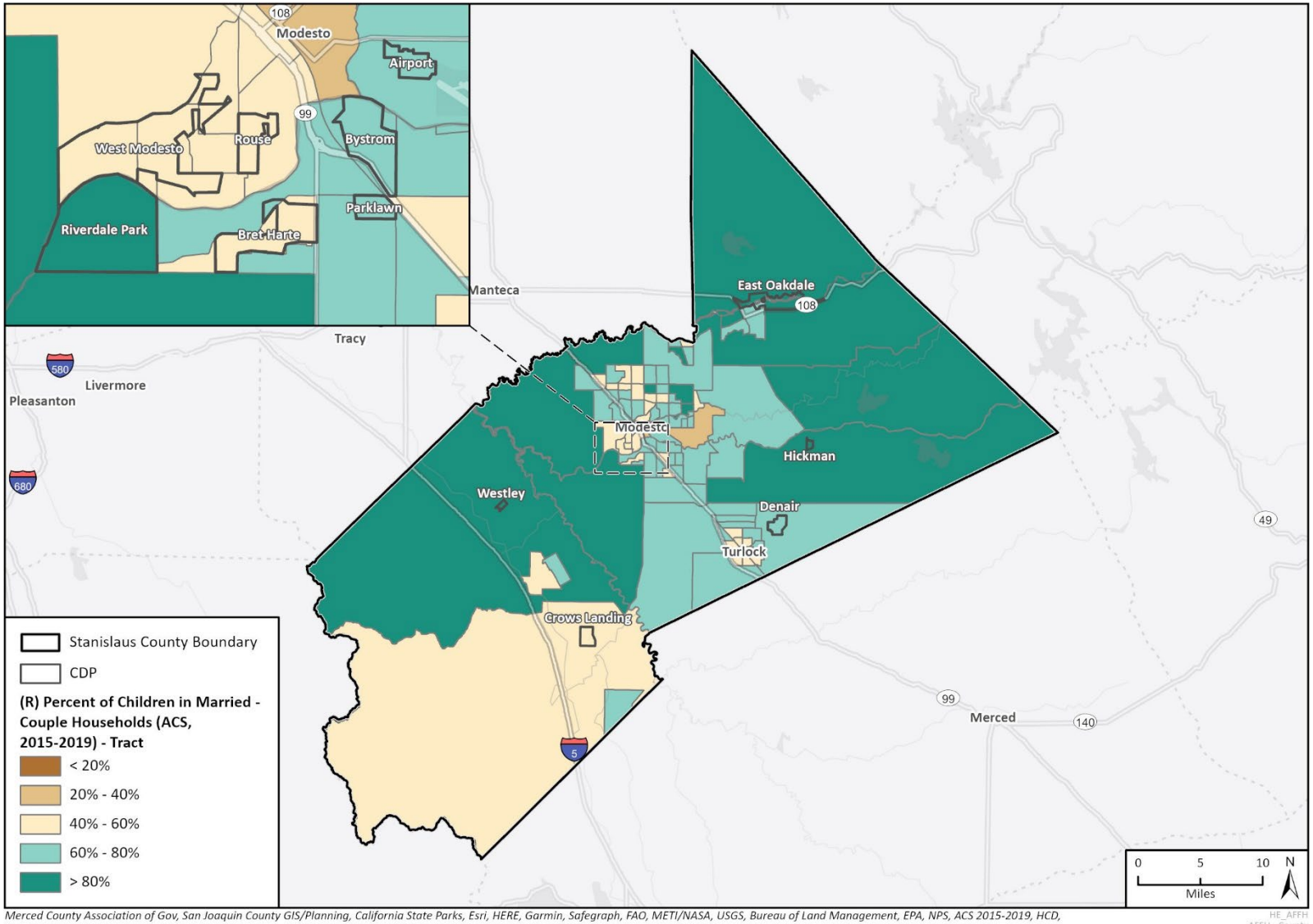


Figure 3-17 Children in Female-Headed Households, No Spouse/Partner Present by Census Tract, Stanislaus County

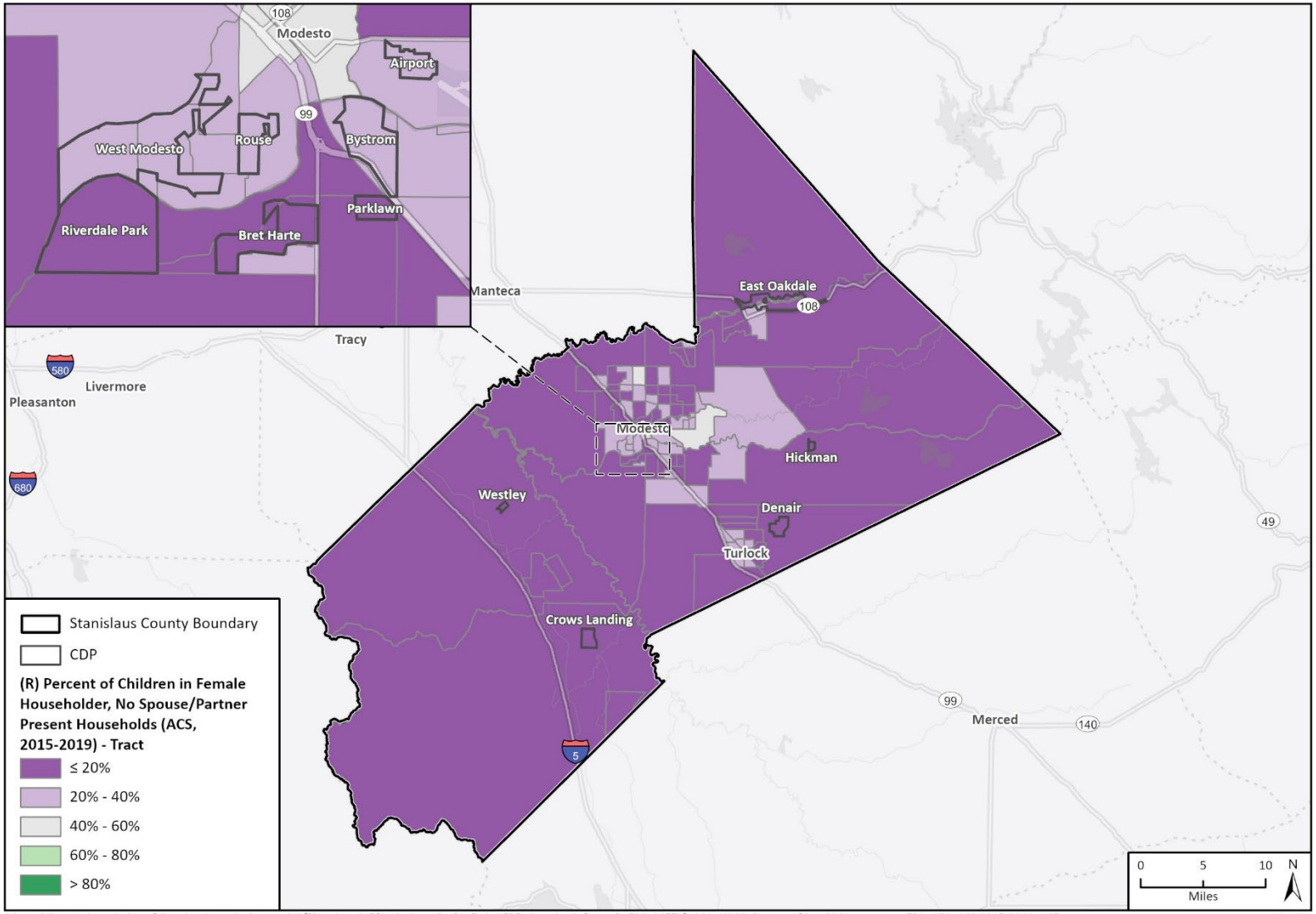
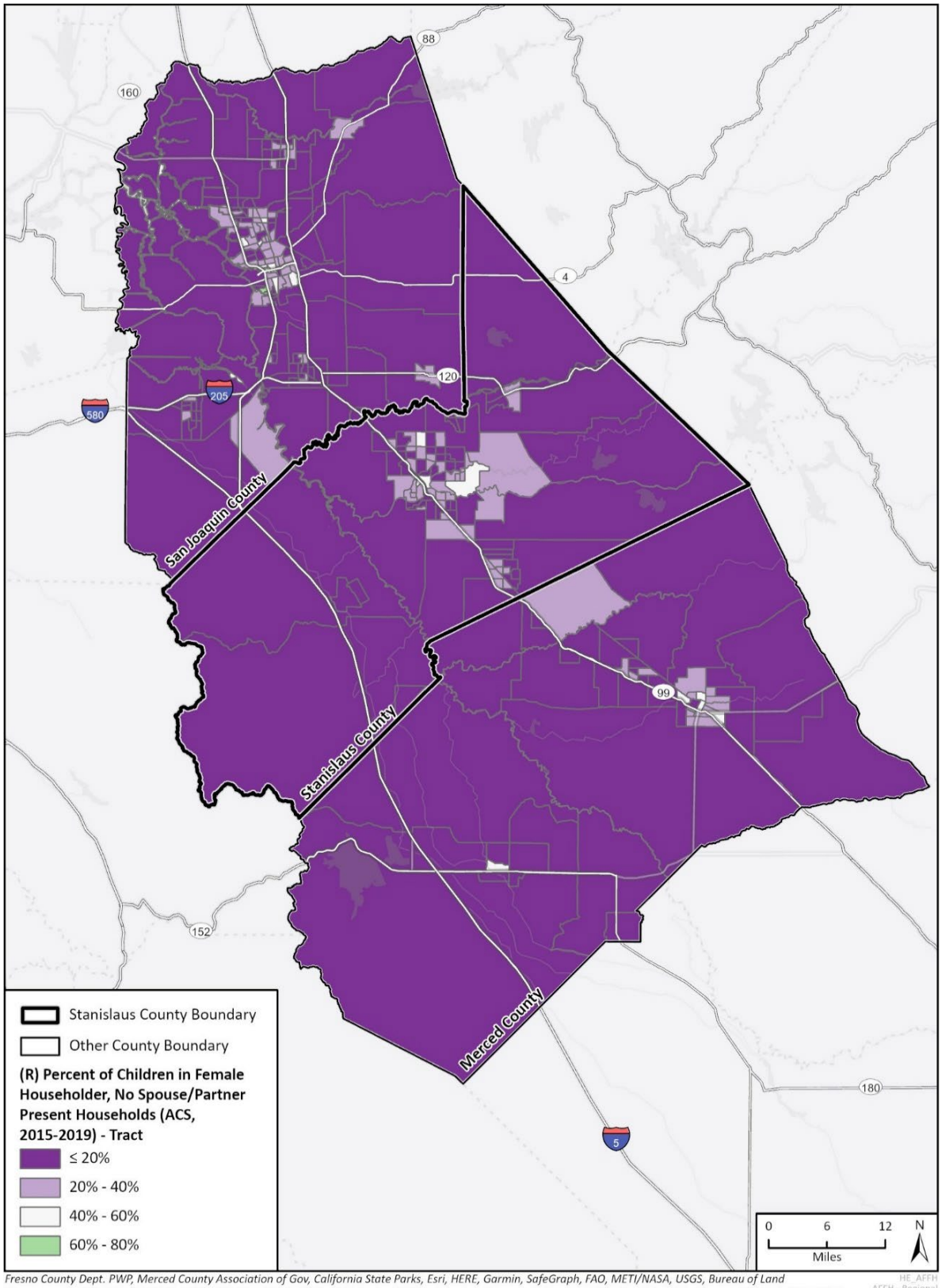


Figure 3-18 Children in Female-Headed Households, No Spouse/Partner Present, Region



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

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3.9 Household Income

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

Local Trends

As discussed in Chapter 2, *Housing Needs Assessment*, as of 2022 Stanislaus County had an estimated median household income of $80,300. Median income is the middle value of the range of all household incomes in the County. According to 2020 ACS data, Stanislaus County had an overall lower median household income compared to the state for all household types, as displayed in Table 3-9. However, Stanislaus County's median household income varies by area, as shown in Figure 3-19. The areas with lowest median household incomes are concentrated in and near the cities of Modesto and Turlock, the South Modesto CDPs (including the CDPs of Airport [$29,801] and Parklawn [$29,185]), and the southwestern part of the County. Areas with low median household income overlap with areas that are predominantly Hispanic and have a higher rate of female-headed households. Comparatively, areas of the County with the highest median household incomes are concentrated in northern and eastern parts of the County, particularly areas north of Modesto where household median income ranges from $81,000 to $84,000. East Oakdale has the highest median household income of the County's CDPs ($125,958). East Oakdale overlaps with concentrated areas of affluence and predominantly white populations. The southwestern part of Denair also has a high median household income ($104,430). Most of the CDPs in unincorporated Stanislaus County have median household incomes between $30,000 and $55,000, which is significantly lower than the County's median household income. While northern and eastern parts of the County have the highest median household income in the County, they are below the state median household income of $84,097.

Most of the CDPs have a lower median household income than the County ($62,873, according to 2015-2020 ACS estimates) (Table 3-8). The CDPs with significantly lower median household incomes than the County are Airport ($28,370), Bret Harte ($33,250), Bystrom ($34,796), Empire ($39,727), Keyes ($46,250), La Grange ($16,875), and West Modesto ($43,864). In contrast, the CDPs with significantly higher median household incomes than the County are Del Rio ($113,125), Denair ($83,304), Diablo Grande ($106,167), East Oakdale ($123,523), and Salida ($82,563). These CDPs also have a high percentage of non-Hispanic/Latino white residents and are concentrated north of the City of Modesto and in northeast parts of the County. ACS data on median household income is not available for some CDPs due to the low number of residents in those CDPs.

Table 3-8 Median Household Income by Census Designated Place

	Median Household Income
Stanislaus County	**$62,873**
CDPs	
Airport	$28,370
Bret Harte*	$33,250
Bystrom**	$34,796
Cowan Tract	$66,082
Crows Landing	$30,458

	Median Household Income
Del Rio	$113,125
Denair	$83,304
Diablo Grande	$106,167
East Oakdale	$123,523
Empire	$39,727
Grayson	$62,404
Hickman	$74,063
Keyes	$46,250
Knights Ferry	-
La Grange	$16,875
Monterey Park Tract	-
Orange Blossom	$68,750
Parklawn*	$63,764
Riverdale Park Tract*	-
Rouse/Colorado***	$50,132
Salida	$82,563
Valley Home	-
Westley	-
West Modesto***	$43,864

* The Bret Harte, Parklawn, and Riverdale Park Tract CDPs are located in the South Modesto area.

** The Bystrom CDP is located in the North Ceres area.

*** The Rouse/Colorado CDP is located in the West Modesto area. The West Modesto CDP is made up of multiple neighborhoods.

Source: ACS Data 2020 5 year Estimates, Table DP03

HUD uses the term low- and moderate-income (LMI) and defines an LMI area as a census tract or block group where over 51 percent of the population is LMI (based on the HUD definition of LMI, up to 80 percent of the area median income or AMI). In Stanislaus County, areas with a high percentage of LMI residents are concentrated in the western part of the County and in and near the cities of Modesto and Turlock. The CDPs with a high population of LMI residents are the South Modesto CDPs, particularly Bret Harte (83 percent), West Modesto (80 percent), and Rouse/Colorado (79 percent), as shown in Figure 3-20. In the CDPs of Riverdale Park Tract, Parklawn, Bystrom, Westley, Airport, and Crows Landing, between 50 and 75 percent of households are LMI. In East Oakdale and Denair, less than 35 percent of households are LMI.

Table 3-9 Median Income by Household Type

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

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

Source: ACS 5 Year, 2016-2020, S1901

Regional Comparison

The Northern San Joaquin Valley has a similar pattern of LMI households to Stanislaus County. Within each County, the areas with the highest percentage of LMI income population (between 75 to 100 percent) are located near major cities and along major highways, as Figure 3-21 displays.

Figure 3-19 Median Household Income by Block Group, Stanislaus County

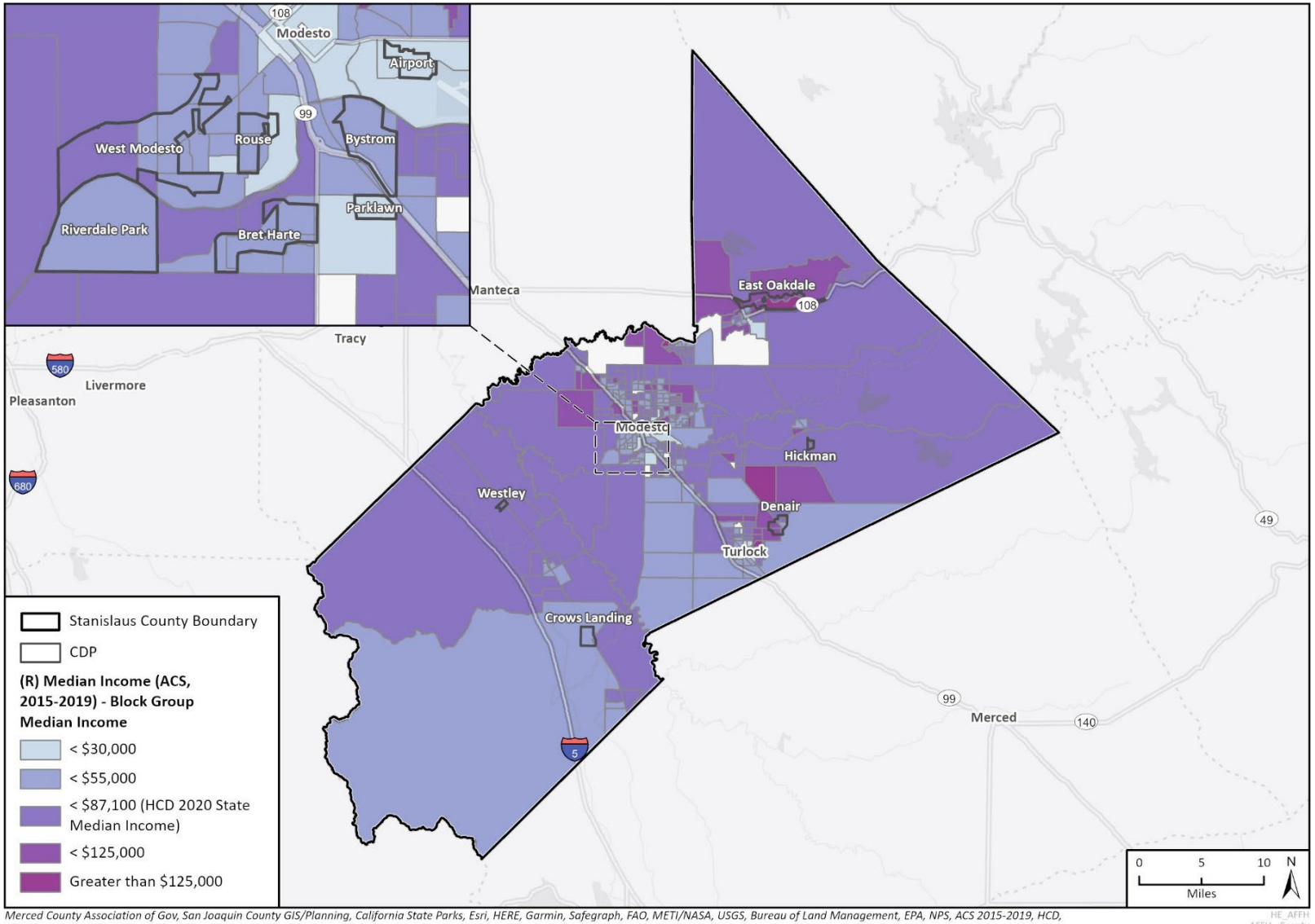
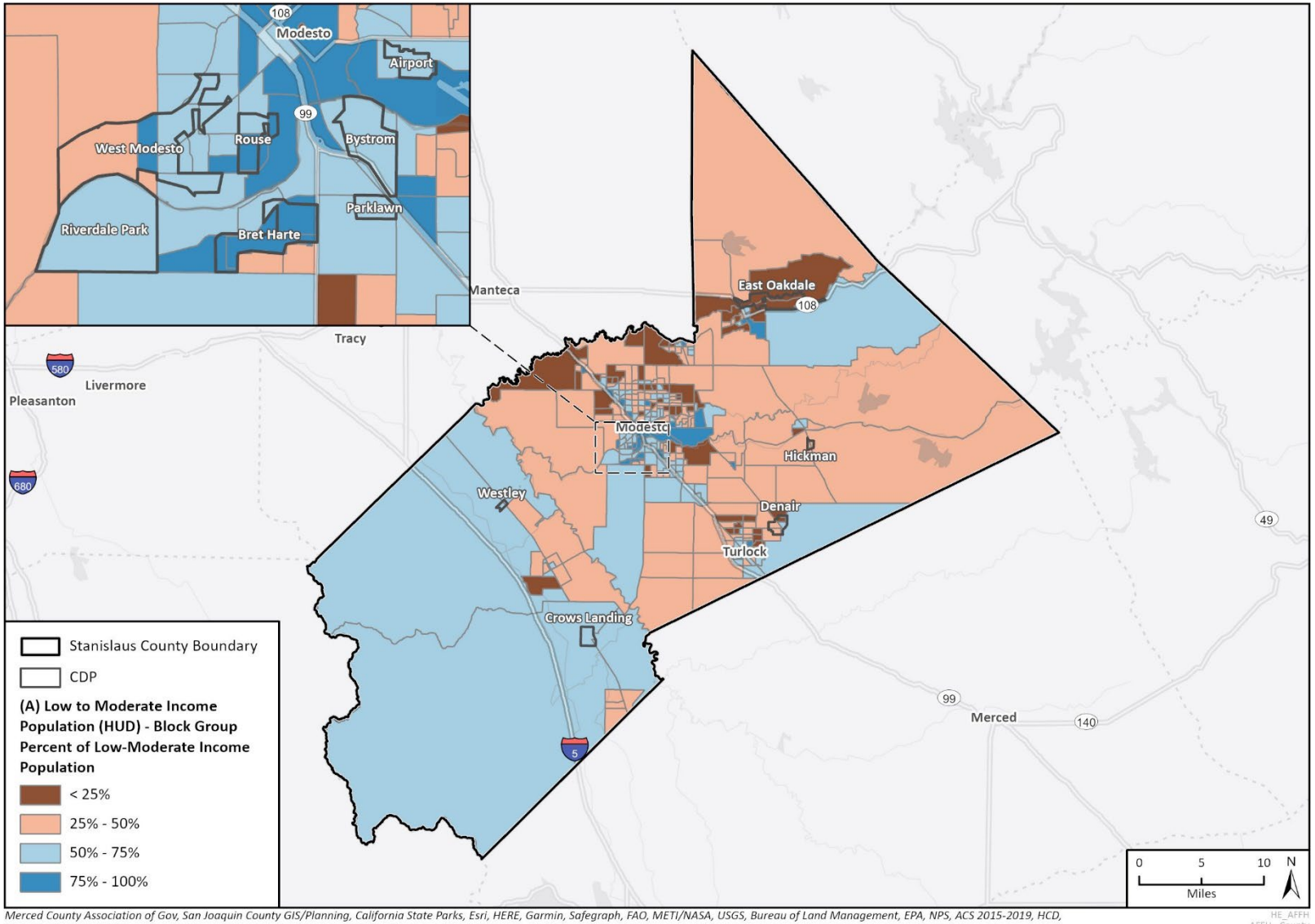


Figure 3-20 Percent Low to Moderate Income Population by Block Group, Stanislaus County



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

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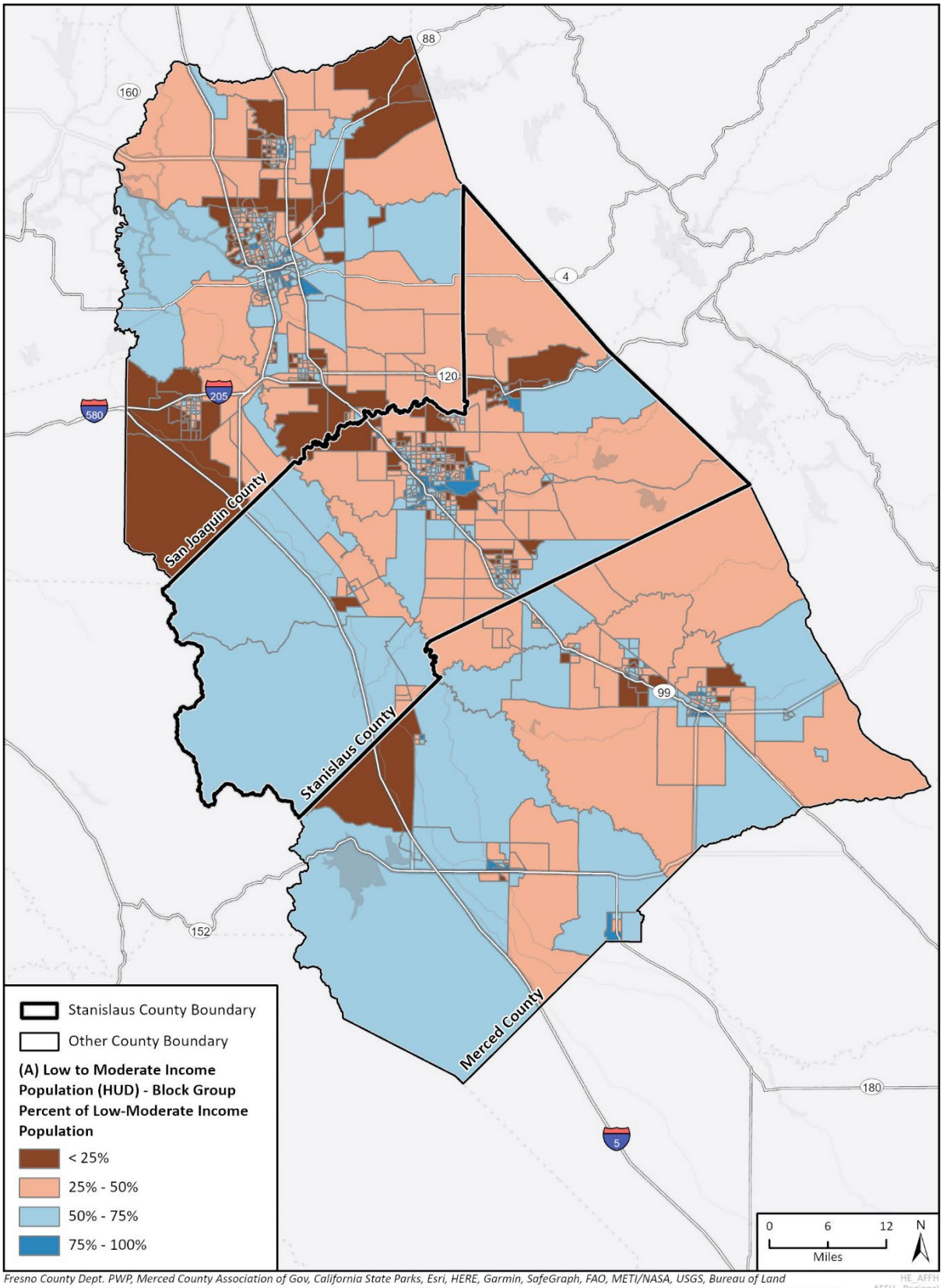
Figure 3-21 Percent Low to Moderate Income Population by Block Group, Region



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

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3.9.1 Racially and Ethnically Concentrated Areas of Poverty

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

3.9.2 Poverty

Local Trends

According to HUD 2009-2013 data, there are four R/ECAPs in Stanislaus County. Three R/ECAPs overlap with the Airport, Rouse/Colorado, and Bret Harte CDPs (see Figure 3-23), which align with patterns of the population earning an income below the poverty level. The fourth R/ECAP overlaps with the City of Ceres and does not include any unincorporated lands. Three of the four R/ECAPs in the County consist of unincorporated islands substantially surrounded by the City of Modesto. These census tracts are predominantly Hispanic/Latino, with more than 81 percent of residents identifying as non-white. According to public feedback, these areas have experienced a consistent lack of public investment, such as sewer connections, stormwater improvements, sidewalks, and street lighting.

The City of Modesto provides water service to the Rouse/Colorado neighborhood and water and sewer service to the Bret Harte and Airport neighborhoods. Rouse/Colorado lacks sewer, curb, gutter, sidewalk, and storm drain improvements and portions of Bret Harte and Airport lack these improvements. All three unincorporated R/ECAPs are primarily zoned for residential uses. Rouse/Colorado is primarily bordered by low density residential uses. Bret Harte is adjacent to low-density residential, agricultural, commercial, and heavy commercial zones. Airport is bordered by mostly industrial and commercial zones, including the Modesto Airport.

Access to opportunities and resources are similar in the three R/ECAPs compared to other CDPs in the southern half of Modesto, according to the HCD/TCAC Opportunity Maps (see Section 3.11.1 HCD/TCAC Opportunity Areas). Some CDPs in other areas of the county, including CDPs in northern Modesto and more rural areas of the county, have higher access to opportunity. All three unincorporated R/ECAPs are in close proximity to schools and Rouse/Colorado and Airport are near several parks; however, Bret Harte only has one park nearby. These conditions are similar to many of the other CDPs within Stanislaus County. Many of the CDPs surrounding Modesto and Ceres are served by city water and some are also served by city sewer systems but lack or partially lack curb, gutter, sidewalk, and storm drain improvements. Other CDPs throughout the county have a mix of infrastructure improvements. The three R/ECAPs have similar access to public transit compared to other CDPs near Modesto that are not considered R/ECAPs and are in closer proximity to centers of employment, schools, and services when compared to more rural CDPs. Transit access in CDPs surrounding Modesto generally consist of fixed-route bus services that connect the neighborhoods to central areas within Modesto.

In Stanislaus County, newer housing developments generally have curb, gutter, sidewalk, street lighting, and storm drainage improvements while older subdivisions do not. All three R/ECAPs have an older housing stock with the median year of housing built in 1944 for Airport, 1962 for Bret Harte, and 1957 for Rouse/Colorado. This is much lower than the median year of housing built in Stanislaus

County overall (1981), Ceres (1986), and Modesto (1978); however, other CDPs within the county that are not R/ECAPs also have a median year of housing built in the 1940s and 1950s similar to the R/ECAPs.

Beginning in 2011, Stanislaus County assessed infrastructure improvement needs in communities throughout the unincorporated county and conducted a sewer project prioritization study in 2019 to identify and prioritize infrastructure needs. In 2020, the County conducted a supplemental analysis for 13 county communities, which assessed infrastructure improvement needs in primarily rural communities located outside of the Modesto area. Based on the findings of these evaluations, the County developed and began implementing improvement projects using American Rescue Plan Act (ARPA) and Community Development Block Grant (CDBG) funding and are combining those funds with State Water Board funding where awarded. In 2021, the County awarded ARPA monies for infrastructure improvements to seven different unincorporated communities, including $10,000,000 each for the Rouse/Colorado and Bret Harte neighborhoods to fund curb, gutter, sidewalk, and storm drainage improvements. A sewer infrastructure project for the Rouse/Colorado neighborhood is also in progress. The improvement plans for the work to be completed in the Rouse/Colorado and Bret Harte neighborhoods are almost complete and environmental review has been completed. Staff anticipates beginning the process of establishing a Benefit Assessment District for both neighborhoods in early 2025. Sewer infrastructure was installed in the Airport neighborhood by the County in 2018, with CDBG and State Water Board funding. Sidewalks and bike path improvements were recently installed in portions of the Airport and Bret Harte neighborhoods through a combination of Measure L funding and Active Transportation Planning (ATP) grant funding.

The Rouse/Colorado, Airport, and Bret Harte R/ECAPs have significantly lower median household incomes than the County overall ($80,300 for Stanislaus County, $18,207 to $50,048 for Rouse/Colorado, $32,386 to $49,054 for Bret Harte, and $24,422 to $29,801 for Airport). R/ECAPs in unincorporated areas of the County have a higher percentage of multigenerational households compared to many other areas of the County. In the R/ECAPs, between nine and 17 percent of households are multigenerational households. In other unincorporated areas of the County, between six and nine percent of households are multigenerational households, and in parts of Modesto east of Highway 99, between three and six percent of households are multigenerational households.[14] R/ECAPs also have an older housing stock than most other areas of the County. The median year built for housing units ranges from 1950 to 1958 in the Rouse/Colorado R/ECAP, 1963 in the Bret Harte R/ECAP, 1958 in the Airport R/ECAP, and 1974 in the Parklawn R/ECAP. According to ACS estimates, throughout most unincorporated County, the median year built for housing units ranges from 1970 to 2009. In addition to R/ECAPs, the California Tax Credit Allocation Committee (TCAC) categorizes census tracts that have both a poverty rate of over 30 percent and designated as being racially segregated (having an overrepresentation of people of color relative to the region) as areas of high segregation and poverty. Census tracts with 1.25 times the County's percentage of non-white residents. Areas of high segregation and poverty in Stanislaus County are located in and near the cities of Modesto and Turlock. Areas of high segregation and poverty overlap with the Airport CDP and R/ECAP, the Bystrom CDP, and the Empire CDP, and also include four census tracts in the southwestern part of the City of Modesto and one census tract in the southern part of the City of Turlock (Figure 3-24). Similar to the County's R/ECAPs, areas of high segregation and poverty have low median household incomes and a high percentage of non-white residents compared to the rest of the County. Areas of high segregation and poverty in South Modesto CDPs have median household incomes ranging from $18,207 and $50,048 and most are predominantly Hispanic/Latino. The areas

[14] U.S. Census. 2020 Census Demographic Map Viewer. https://maps.geo.census.gov/ddmv/map.html, accessed April 2, 2024.

of high segregation and poverty in Empire and Turlock are also predominantly Hispanic/Latino with median household incomes ranging from $29,801 to $30,750 for Empire and $23,132 to $40,484 for Turlock. In the areas of high segregation and poverty in the South Modesto CDPs, the median year built for housing units ranges primarily from 1938 to 1961.

R/ECAPs and areas of high segregation and poverty have a high percentage of renter households compared to the rest of the County with up to 86 percent of households renting in South Modesto CDPs, 71 percent in Airport, 72 percent in Rouse/Colorado, 65 percent in Bret Harte, 44 percent in Empire, 55 percent in Ceres, and 85 percent in Turlock. Parts of Bret Harte, Ceres, and Turlock also have a higher percentage of multifamily housing units than the rest of the County, ranging from 21 to 26 percent of housing units. In contrast, between 10 and 20 percent of housing units are multi-family in large portions of Modesto and less than 10 percent are multi-family throughout most of the County. In the area of high segregation in Empire, approximately seven percent of housing units lack complete kitchen or plumbing, compared to only one percent of housing units in Stanislaus County overall.

R/ECAPs and areas of high segregation and poverty in Stanislaus County are Low Resource areas, with low education and environmental outcomes and a high level of pollution burden. R/ECAPs and areas of high segregation and poverty also have high rates of overcrowding (up to 24 percent of households), overpaying for housing among homeowners (up to 42 percent of households) and renters (up to 73 percent of households), and have a high risk of displacement. Sections 3.13 and 3.16 below provides additional local knowledge for each identified R/ECAP neighborhood and analyzes R/ECAPs in relation to the Sites Inventory.

Overall, Stanislaus County has a similar percentage of its population living below the poverty level to the state average, as shown in Table 3-10. However, when comparing the County and State percentage of female-headed households below the poverty line, Stanislaus County is lower (Table 3-11). In unincorporated Stanislaus County, approximately 13 percent of female-headed households earned an income below the poverty line, lower than the state average of 22 percent. A high concentration of female-headed households overlaps with the greatest poverty rate near Empire. In Airport and Bystrom, 35 to 37 percent of the population earns an income below the poverty level, as seen in Figure 3-22, which is more than the other CDPs in the County. West Modesto, Rouse/Colorado, Riverdale Park Tract, Bret Harte, Crows Landing, and Empire also have high rates of poverty, between 20 and 30 percent. In East Oakdale and Denair between 10 and 20 percent of the population is below the poverty line. Westley and Valley Home are located in census tracts with less than 10 percent of the population living below the poverty line.

Table 3-10 Income and Poverty

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

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

Table 3-11 Poverty by Female-Headed Households

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

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

As discussed above, many of the CDPs in Stanislaus County have a significantly higher poverty rate than the County (Table 3-12). These CDPs include Airport (39.5 percent), Bret Harte (33.9 percent), Bystrom (30.2 percent), Crows Landing (26.6 percent), Empire (23.5 percent), Keyes (29.8 percent), Valley Home (22.5 percent), Rouse/Colorado (19.8 percent) and West Modesto (25.4 percent). Several CDPs have poverty rates more than four times higher than the County's poverty rate. These CPDs are La Grange (65.0 percent), Monterey Park Tract (66.9 percent), and Riverdale Park Tract (62.6). In contrast, CDPs north of the city of Modesto and in northeastern Stanislaus County generally have low poverty ratees.

Table 3-12 Poverty Rate by Census Designated Place

	Percent of the Population Living in Poverty
Stanislaus County	**13.5**
CDPs	
Airport	39.5
Bret Harte*	33.9
Bystrom**	30.2
Cowan Tract	0.0
Crows Landing	26.6
Del Rio	6.7
Denair	6.0
Diablo Grande	3.1
East Oakdale	1.1
Empire	23.5
Grayson	11.9
Hickman	11.2
Keyes	29.8
Knights Ferry	12.9
La Grange	65.0
Monterey Park Tract	66.9
Parklawn*	11.0
Riverdale Park Tract*	62.6
Rouse/Colorado***	19.8
Salida	8.7
Valley Home	22.5

	Percent of the Population Living in Poverty
Westley	7.5
West Modesto***	25.4

* The Bret Harte, Parklawn, and Riverdale Park Tract CDPs are located in the South Modesto area.

** The Bystrom CDP is located in the North Ceres area.

*** The Rouse CDP is located in the West Modesto area. The West Modesto CDP is made up of multiple neighborhoods.

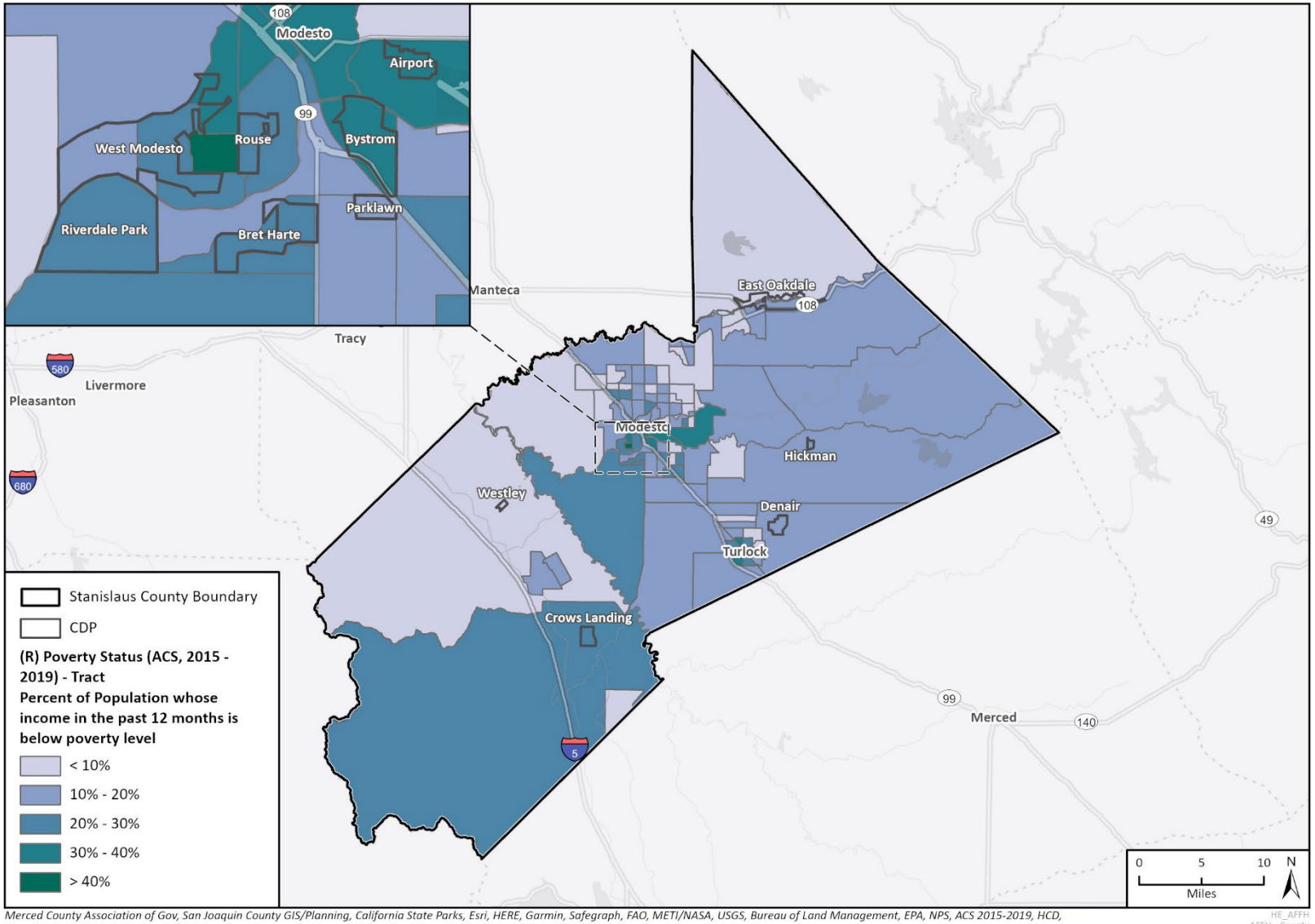
Source: ACS Data 2020 5 year Estimates, Table S1701

R/ECAPs in the unincorporated parts of the County frequently have limited access to infrastructure and services (e.g., water, sewer, storm drainage, police, and fire) that are provided within incorporated cities. The County is not a water or sewer provider and can only contribute funding to the construction of water and sewer facilities served by other providers. The County funds public infrastructure improvements to areas lacking services where they can. However, the County does not have the funding to provide the same level of service that incorporated cities can provide, since they are serving a much larger region and since County funds are shared amongst many unincorporated communities.

Regional Comparison

Stanislaus County compares similarly to the Northern San Joaquin Valley in its distribution of impoverished individuals and location of R/ECAP populations. Poverty levels throughout the region average 10-20 percent, with the more concentrated levels of poverty located near major cities and along major highways, as shown on Figure 3-25. R/ECAPs are also generally located near major cities and along major highways, as shown on Figure 3-26.

Figure 3-22 Poverty Status by Tract, Stanislaus County



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

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Figure 3-23 R/ECAPs in Stanislaus County

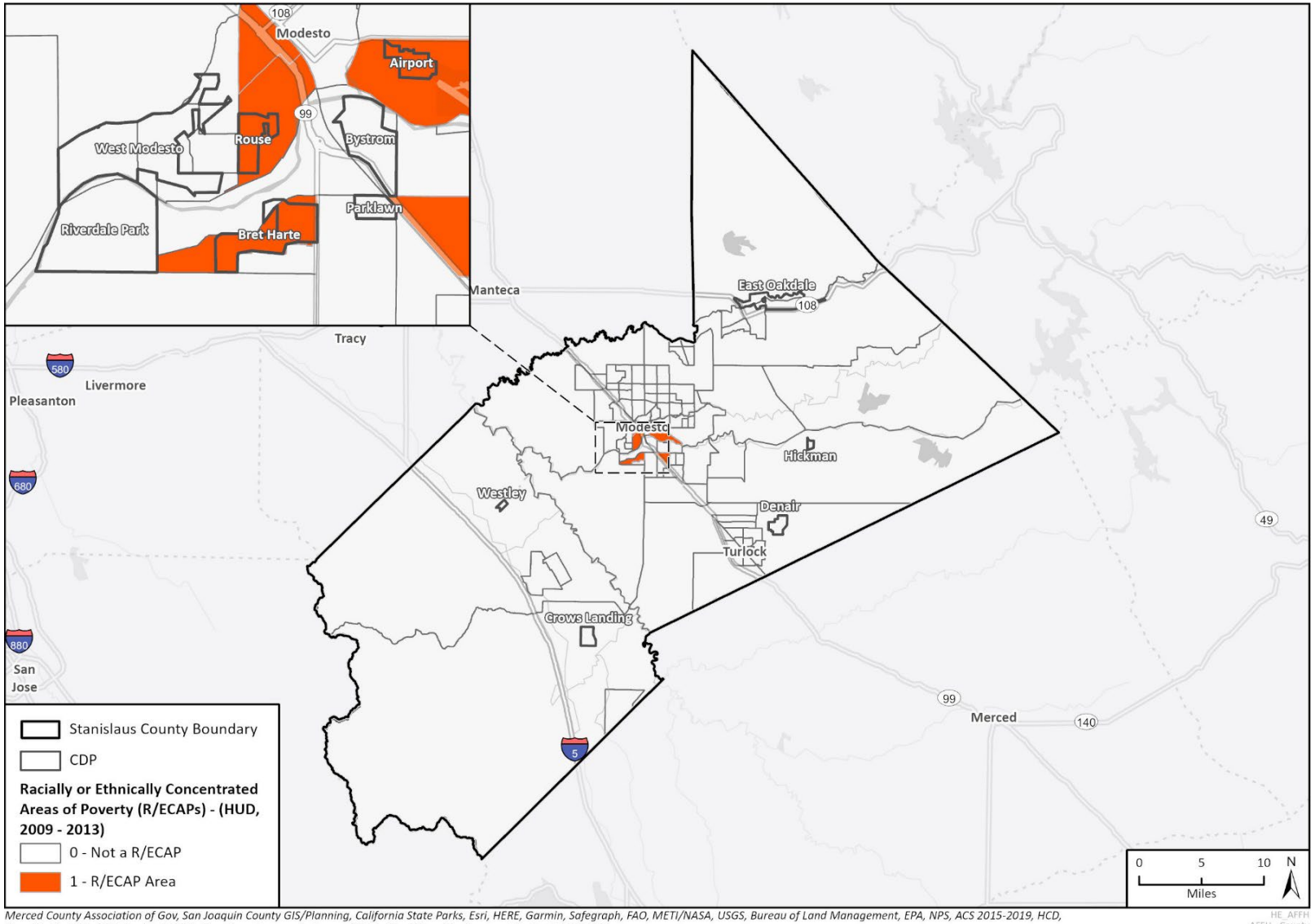

Figure 3-24 Areas of High Segregation and Poverty in Stanislaus County

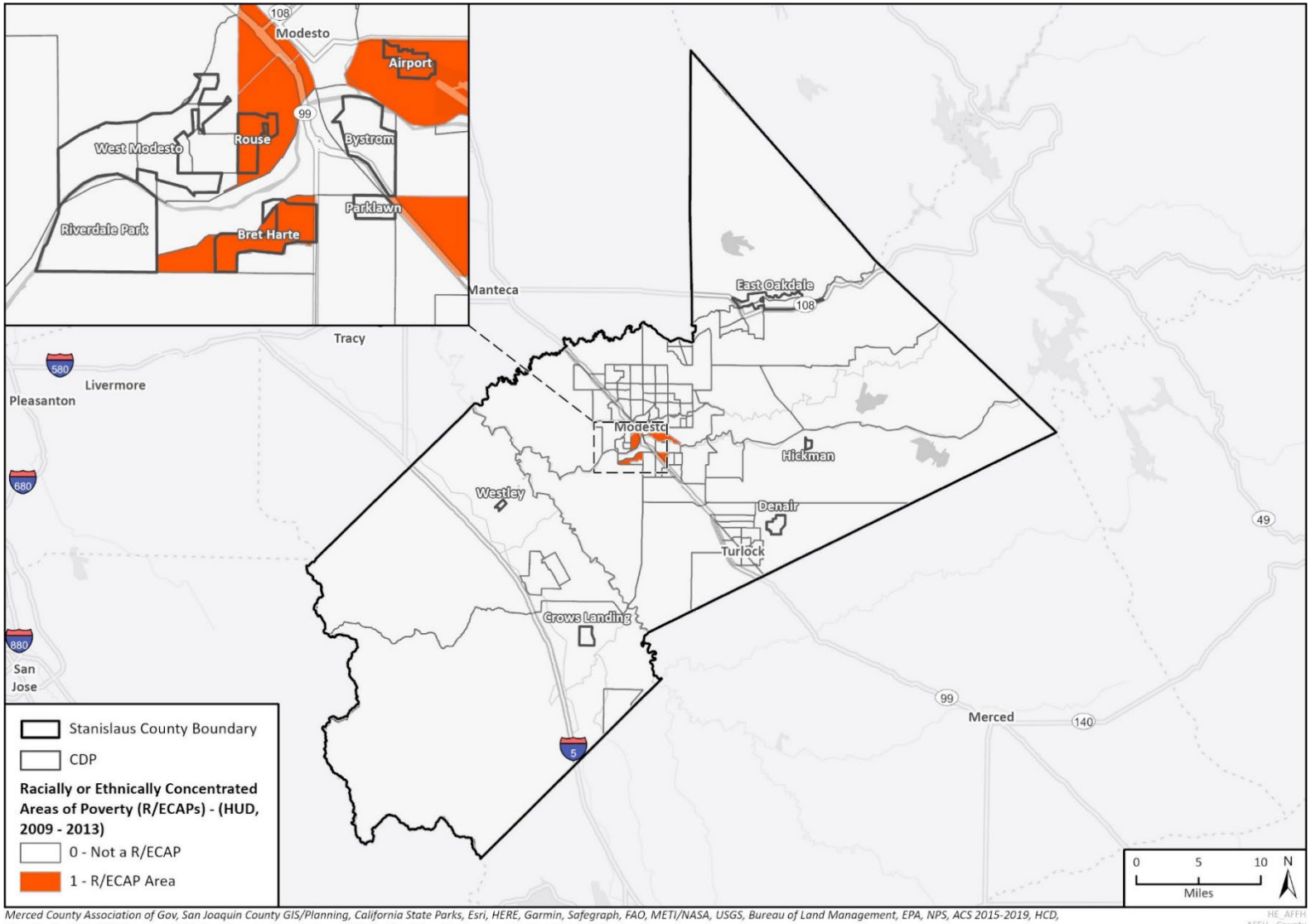

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Figure 3-25 Poverty Status by Census Tract, Region

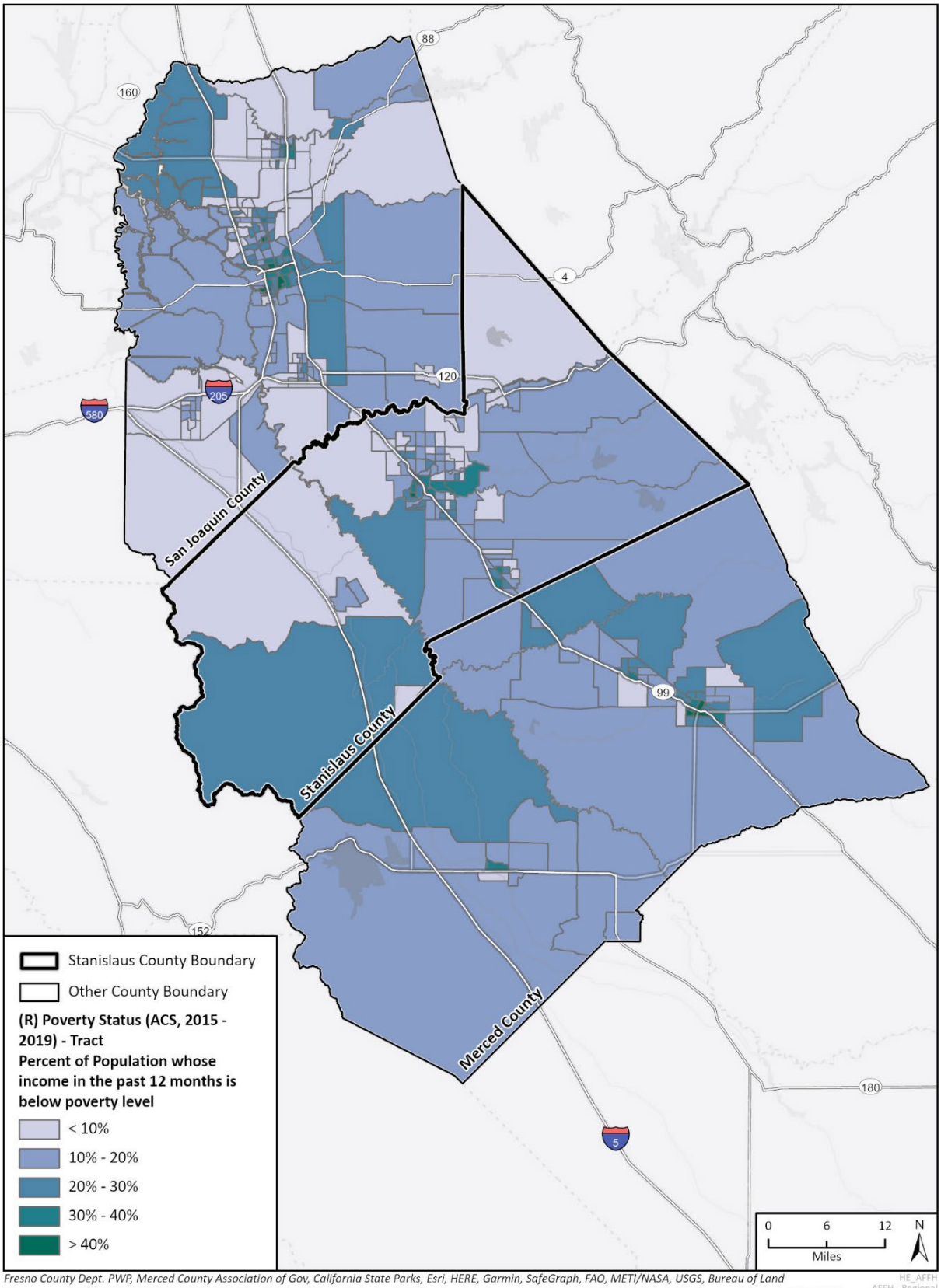

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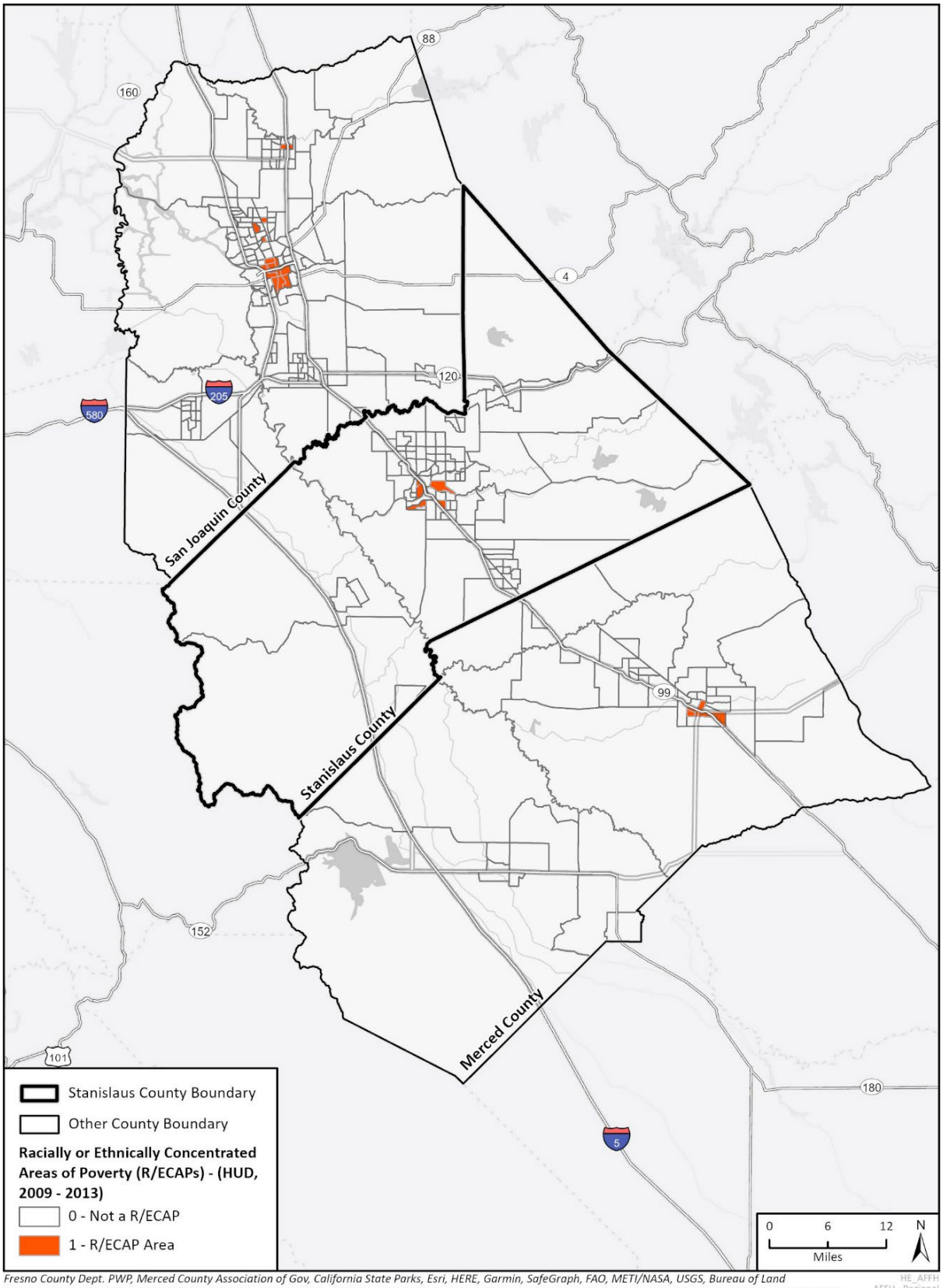
Figure 3-26 R/ECAPs, Region



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3.9.3 Concentrated Areas of Affluence

While R/ECAPs have been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated and promotes equitable access to opportunity, a key to fair housing choice. HCD defines an RCAA as a census tract in which 80 percent or more of the population is white and has a median income of at least $125,000.[15]

Local Trends

As shown in Table 3-13, Stanislaus County had a lower median household income when compared to the state average for all racial and ethnic groups. In Stanislaus County, American Indian and Alaska Native households have the lowest median household income of any racial or ethnic group, while non-Hispanic/Latino white households had the highest.

Table 3-13 Median Household Income by Race or Hispanic Origin

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

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

There are three RCAAs within Stanislaus County: the northeastern corner of the County (north of the City of Oakdale) overlapping the CDPs of Valley Home, Orange Blossom, and Knights Ferry, the census tract in eastern Stanislaus County overlapping the CDP of East Oakdale, and the Census tract overlapping the CDP of Denair (Figure 3-27). All three RCAAs have a higher percentage of non-Hispanic/Latino white residents, high median household incomes, and a high percentage of senior residents. The RCAAs are predominantly white, with a non-Hispanic/Latino white population of 62 to 75 percent, whereas only 40 percent of the total population of the County is non-Hispanic/Latino white. According to the Othering and Belonging Institute, the Valley Home/Orange Blossom/Knights Ferry RCAA and East Oakdale RCAA have a high level of white segregation. The RCAAs also have significantly higher median household incomes than the County average ($80,300), with a median household income of $94,940 in the Valley Home/Orange Blossom/Knights Ferry RCAA, $102,500 in the East Oakdale RCAA, and $93,060 in the Denair RCAA. Each RCAA overlaps with Highest/High Resource opportunity areas and a far proximity to jobs. The RCAAs also have a higher percentage of senior residents compared to the County overall, with 23 percent of residents over the age of 65 in the Valley Home/Orange Blossom/Knights Ferry RCAA, 22 percent of residents over the age of 65 in the East Oakdale RCAA, and 16 to 17 percent of residents over the age of 65 in the Denair RCAA. Only 13 percent of residents in the County overall are over the age of 65.

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

The housing stock in RCAAs is newer compared to most other areas of the County. Housing units in the Valley Home/Orange Blossom/Knights Ferry RCAA has a median year built of 1982 and the East Oakdale RCAA has a median year built of 1990. Housing units in the Denair RCAA have a median year built of 1973 to 1987. The RCAAs also have a higher percentage of owner-occupied households compared to the rest of the County. The percentage of households that are owner households ranges from 77 to 83 percent in the RCAAs, whereas only 60 percent of households are owner households in the County overall. The RCAAs have many newer residential neighborhoods and higher median home values than the rest of the County. According to ACS estimates, median home value in Stanislaus County is $338,300, compared to $630,300 in the Valley Home/Orange Blossom/Knights Ferry RCAA, $641,900 in the East Oakdale RCAA, and between $367,100 and $450,300 in the Denair RCAA.

Developed areas within the RCAAs consist of rural residential unincorporated communities that are primarily developed with single-family residential uses. Development in the Valley Home/Orange Blossom/Knights Ferry RCAA is clustered in the CDPs of Valley Home, Orange Blossom, Knights Ferry, and part of East Oakdale which are primarily zoned Rural Residential, Historical, and Agriculture with a minimum parcel size ranging from three to 10 acres. These zones allow for two dwelling units per parcel when over one acre in size or when at least 20,000 square-feet in size when connected to at least one public water or sewer service. These CDPs lack public sewer and mostly lack public water and are primarily developed with single-family residential uses on large lots ranging from 1 to 20 acres. Similarly, the East Oakdale RCAA contains the southern portion of East Oakdale and a small portion of the city of Oakdale used for agricultural uses. The southern part of East Oakdale is zoned Rural Residential and the remaining areas are zoned Agriculture with a minimum lot size of 10 or 40 acres. Allowed density in the East Oakdale RCAA ranges from two dwelling units per 40 acres to one dwelling unit per 0.46 acres. Development within this RCAA primarily consists of single-family residences on 0.46 acre lots within the most concentrated areas of East Oakdale and single-family residences on larger lots (three to 20 acres) in the outer areas of East Oakdale. Rural areas of the Denair RCAA are zoned Agriculture with a minimum lot size of 40 acres and areas within the CDP of Denair are primarily zoned Rural Residential, Planned Development, Single-Family Residential, Multiple Family Residential, General Commercial and Industrial. Denair is mostly developed with newer single-family residential uses on 7,000 to 12,000 square foot lots.

Many of the single-family homes within the three RCAAs are part of subdivisions built within the past few decades. Newer subdivisions are developed with sidewalk, curb, gutter, and stormwater infrastructure and are connected to public water and sewer service, but some older subdivisions within these areas do not have access to these infrastructure improvements. Homes on larger lots throughout the RCAAs consist of many newer, custom-built homes. The areas with a zoning designation of Agriculture are developed with septic and well systems and do not have curb, gutter, sidewalk, and storm drainage improvements due to the large lot size and rural nature of existing and new development. Compared to other unincorporated communities in the county, including communities within the R/ECAPs, communities in the RCAAs consist of newer subdivisions and custom homes, with access to public infrastructure improvements. Residential uses within the RCAAs are generally single-family homes on large lots and do not include multifamily uses. Section 3.16 below provides additional local knowledge for each identified RCAA neighborhoods and analyzes RCAAs in relation to the Sites Inventory.

Regional Comparison

The RCAAs in surrounding counties have similar attributes to those found in Stanislaus County. The RCAAs in San Joaquin and Merced counties are in rural areas or isolated census tracts outside of incorporated cities (Figure 3-28).

Figure 3-27 Racially Concentrated Areas of Affluence, Stanislaus County

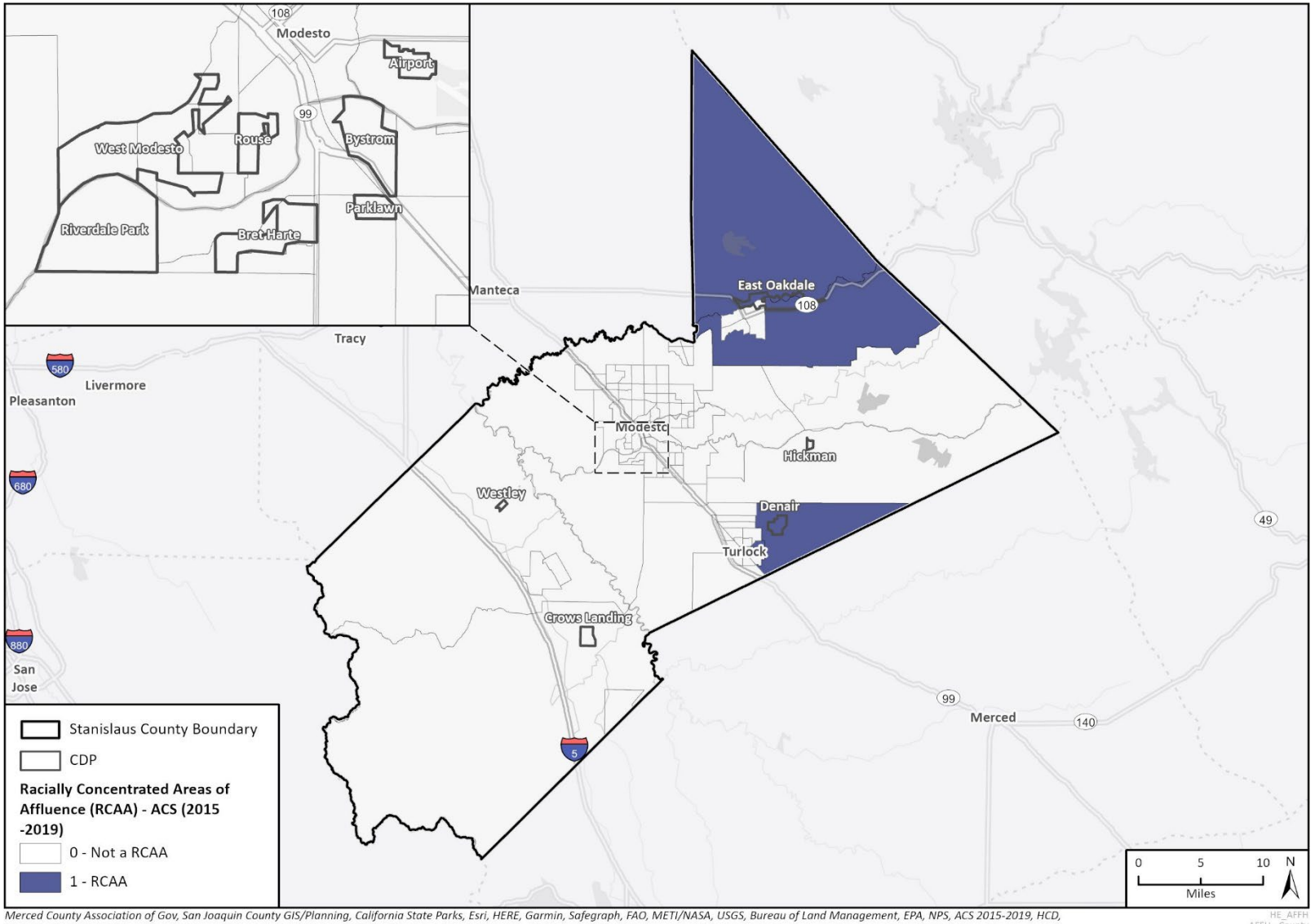

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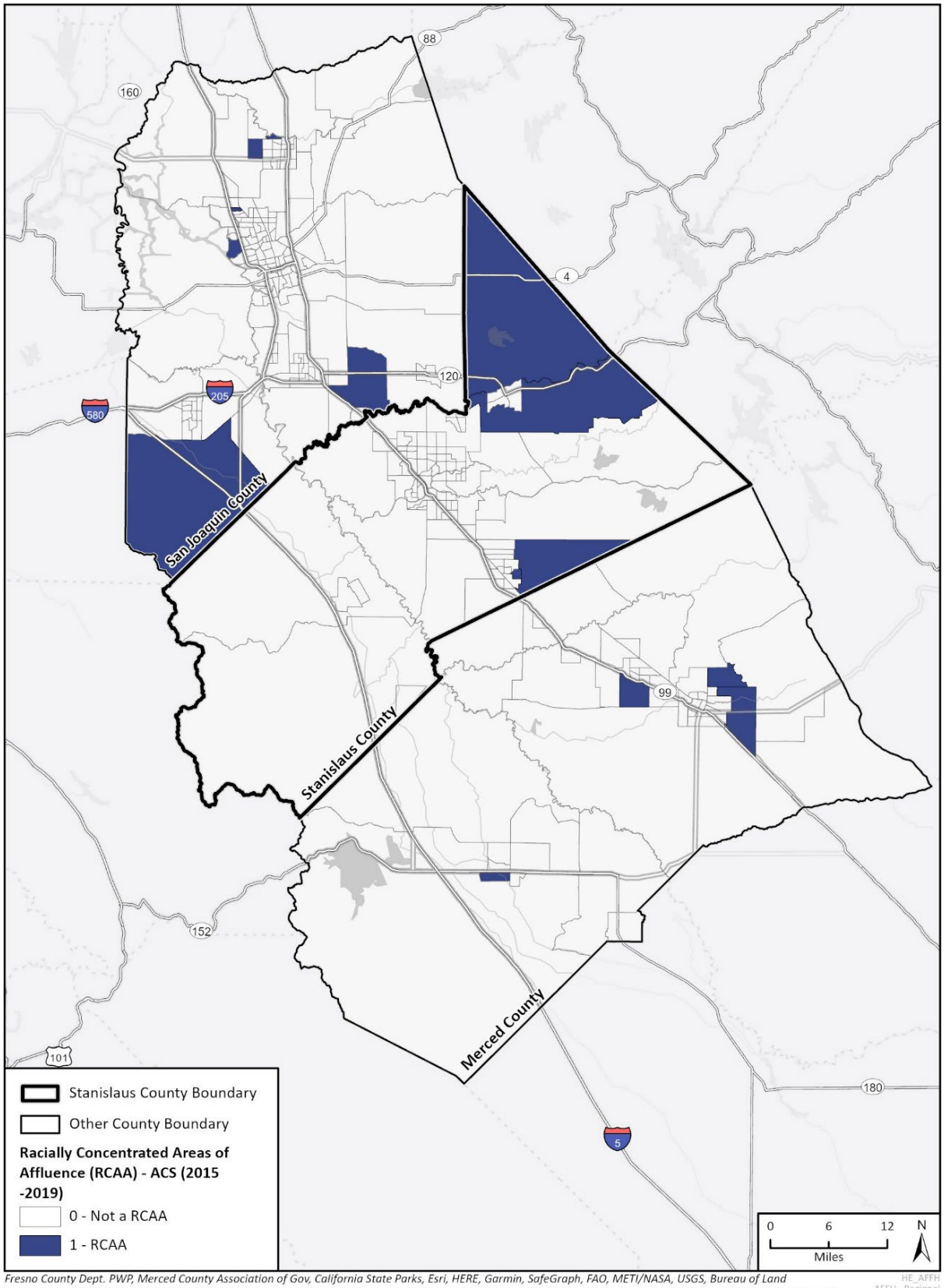
Figure 3-28 Racially Concentrated Areas of Affluence, Region



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3.10 Location of Affordable Housing

The geographic distribution of publicly supported housing is an important factor in examining fair housing choice and segregation by income and race/ethnicity. Figure 3-29 shows the location of publicly supported affordable housing in Stanislaus County relative to racial/ethnic composition. The diagram shows publicly subsidized housing in relation to areas of concentrated segregation and poverty.

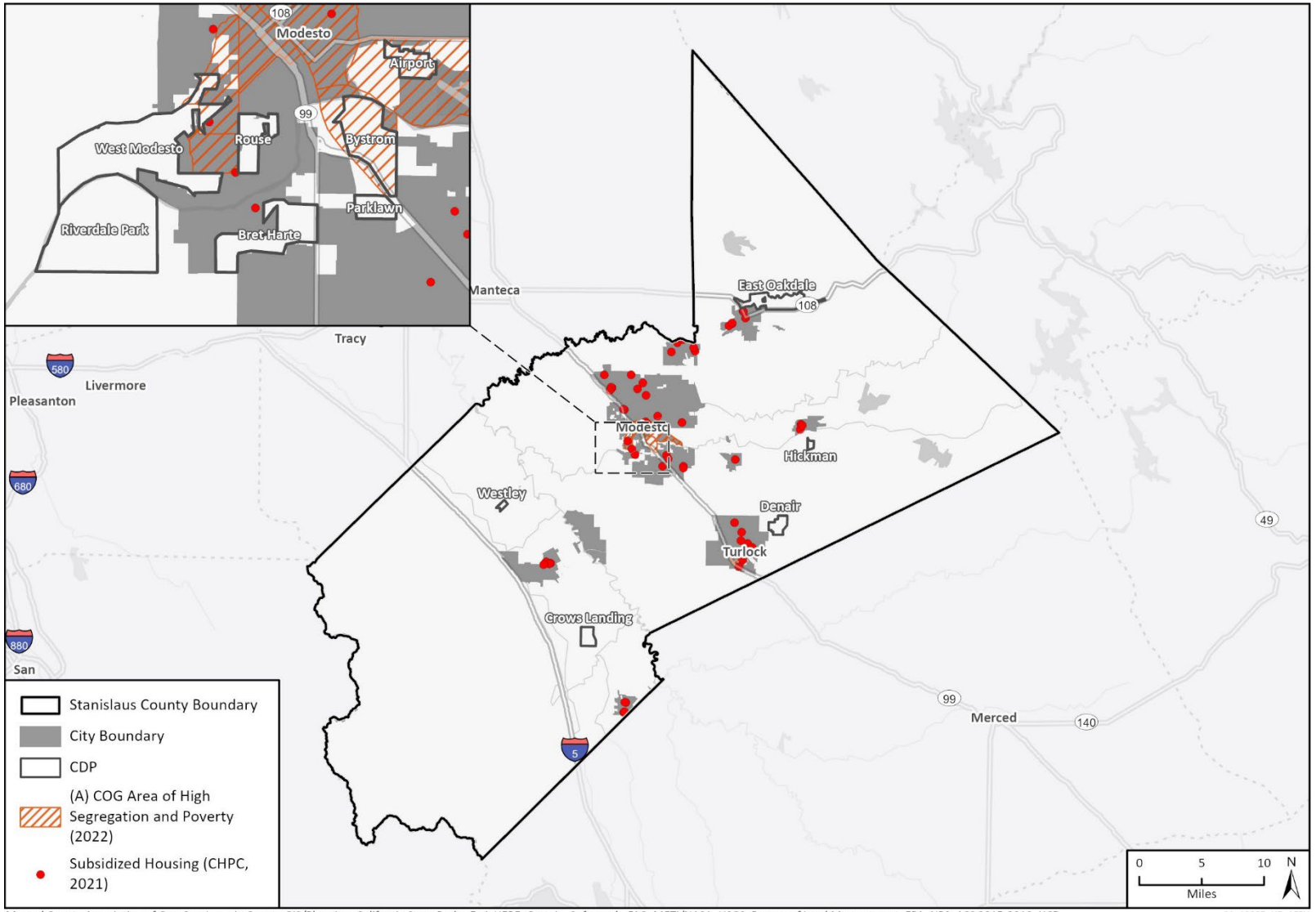
Local Trends

In Stanislaus County, there are a total of 54 publicly subsidized affordable housing developments. As Figure 3-29 displays, subsidized affordable housing is concentrated in urban parts of the County. A majority of subsidized housing is located east of Highway 99 and in incorporated cities. According to 2021 data from the California Housing Partnership, there are no subsidized affordable housing developments in unincorporated Stanislaus County. Areas in the County that provide subsidized housing fall within areas where the median income is less than $55,000. The overlap of subsidized housing and predominant race populations appears to have no correlation.

Regional Comparison

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

Figure 3-29 Location of Publicly Supported Affordable Housing in Stanislaus County



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

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3.11 Disparities in Access to Opportunities

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

3.11.1 HCD/TCAC Opportunity Areas

The TCAC/HCD Opportunity Maps show areas that offer lower-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. These opportunity maps are made from composite scores of three different domains made up of a set of indicators, as described in full detail in Section 3.11.2, *Opportunity Areas by Indicator*. The greater the composite score, the higher the resources in that tract. The primary function of TCAC is to oversee the Lower-Income Housing Tax Credit (LIHTC) Program, which provides funding to developers of affordable rental housing. The opportunity maps play a critical role in funding decisions to facilitate the development of affordable housing in areas with the highest opportunity as well as determining the RHNA for the County.

Local Trends

The TCAC opportunity area composite score varies from very low to very high throughout the County, as shown in Figure 3-30. Low Resource areas are primarily in the central area of the County, in the CDPs of Rouse/Colorado, Riverdale Park Tract, Bret Harte, Parklawn, and Empire, as well as in Crows Landing. High Resource areas overlap with areas that are predominantly white and have higher median household incomes. Moderate Resource areas are in the southwestern CDPs of Westley and Grayson, and half of Salida. High Resource areas can be found in the northern part of Salida, Keyes, and Denair. Areas with the highest resources are scattered throughout the County but are found in the northwestern CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, as well as Hickman. Conversely, the CDPs of Airport and Bystrom have areas of high segregation and poverty. Based on composite scores for economic, educational, and environmental opportunities, access to opportunity varies widely throughout the County. Areas of high segregation and poverty and Low Resource areas (concentrated in southwestern and central parts of the County) overlap with areas that are predominantly Hispanic/Latino, and areas with lower median household incomes and some of the highest poverty rates in the County.

Regional Comparison

In comparison the Northern San Joaquin Valley, Stanislaus County is similar to the other counties distribution of opportunity areas, as seen in Figure 3-31. The Lower Resource areas are generally located in incorporated cities. There is no consistent pattern of Highest Resource areas throughout the region, as each County has concentrations in different types of landscapes (rural or more urban). In San Joaquin County, those areas are distributed throughout the County. In Merced County, more rural tracts toward the mountains in the east are higher resource.

Figure 3-30 HCD/TCAC Opportunity Areas by Census Tract, Stanislaus County

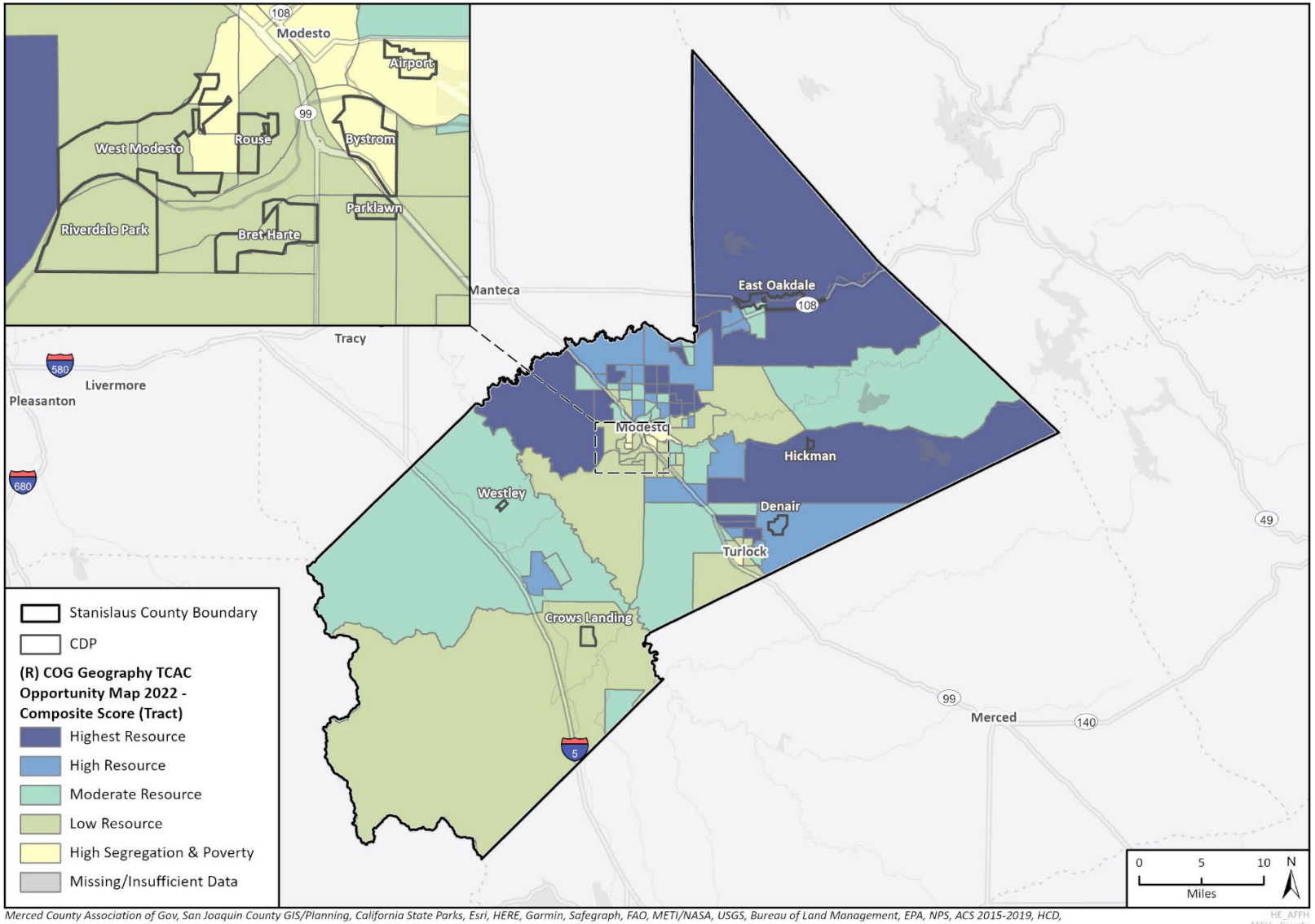
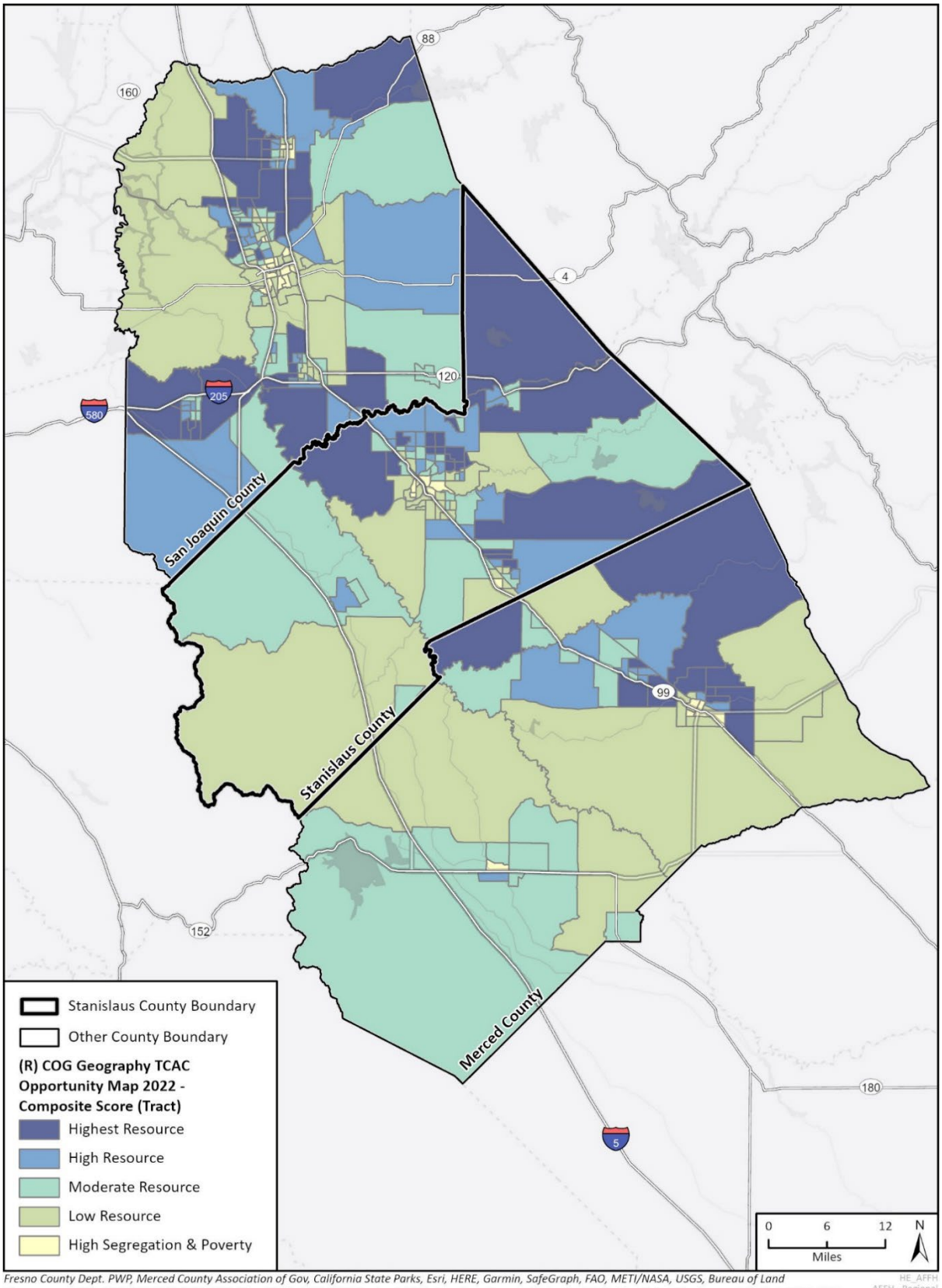


Figure 3-31 HCD/TCAC Opportunity Areas, Region



3.11.2 Opportunity Areas by Indicator

An area's access to opportunity is defined by HUD as its potential to support positive economic, educational, and health outcomes for lower-income families, particularly in terms of long-term outcomes for children. HCD and TCAC analyzed poverty rates, school proficiency, unemployment rates, jobs proximity, transit metrics, and CalEnviroScreen 4.0 scores to assess access to opportunity throughout Stanislaus County. The 2021 TCAC/HCD Opportunity Maps are comprised of composite index scores, including education, economic, and environmental. The higher composite scores mean more access to resources that offer residents a better chance at economic advancement, positive educational outcomes, and better physical and mental health. HCD/TCAC indices demonstrate that Stanislaus County has areas with consistently mid-range opportunity and moderate access to resources, and that opportunity scores are generally higher in areas near job centers. Therefore, lack of access to employment opportunities and job proximity, and low labor market engagement is an impediment for affirmatively furthering fair housing in the County. Figure 3-32 through Figure 3-34 show the county's score as it relates to access to economic, educational, and environmental opportunity as found using TCAC/HCD opportunity area methodology as well as transportation access.

Economic Opportunity and Jobs Proximity Index

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

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

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

Local Trends

Stanislaus County has a generally moderate economic opportunity score and relatively good access to jobs. Economic opportunity throughout the County is generally moderate, falling between the 0.25 to 0.75 range as seen in Figure 3-32. Areas with more positive economic outcomes are concentrated in northeastern and southeastern parts of the County and in the northern parts of the cities of Modesto and Turlock and in the northeastern CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, as well as in Salida and Denair. Less positive economic outcomes are found in the unincorporated Modesto CDPs of West Modesto, Rouse/Colorado, Bret Harte, Bystrom, and Airport, Empire, and Crows Landing. Incorporated cities surrounding these CDPs follow the same trend. Areas with more positive economic outcomes generally overlap with areas that are predominantly white

and have higher median household incomes, greater than $87,100 per year (the State median household income). In addition, areas with more positive economic outcomes overlap with areas that have a lower percentage of older (housing units built prior to 1960) housing units (generally between 17 and 40 percent of housing units) and lower rates of overcrowding, defined as more than 1.0 persons per room (less than five percent of housing units). (Figure 3-32) In contrast, areas with less positive economic outcomes overlap with areas that are predominantly Hispanic/Latino and have lower median household incomes, generally less than $55,000 per year. Areas with less positive economic outcomes also overlap with areas that have a higher percentage of renter-occupied housing units (between 40 to 80 percent of housing units) and a higher percentage of older housing units (between 20 to 80 percent of units built prior to 1960).

Parts of Stanislaus County with the highest job proximity index, meaning there is high access to jobs, are in the city of Modesto and in the western part of the County. As shown in Figure 3-33, much of the County received the middle range (40 to 60) of possible scores for HUD's jobs proximity index, which means Stanislaus County residents have moderate access to jobs. There is no clear pattern of disparity associated with race or ethnicity across the county. Within the county, the highest job proximity indices are located within the CDPs of Airport, Bystrom, Diablo Grande and parts of Salida and Rouse/Colorado, due to their proximity to employment centers such as the Bay Area (Salida and Diablo Grande), Modesto, parts of San Joaquin County, and agriculture. Areas with a lower job proximity score are in the CDPs of Denair, East Oakdale, Orange Blossom, Knights Ferry, and Valley Home with some partially located in the CDPs of the West Modesto and Bret Harte.

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

Regional Comparison

In comparison the Northern San Joaquin Valley, Stanislaus County has a similar distribution in economic opportunity scores and job proximity index. Throughout the region, it appears that the more positive economic scores are in areas surrounding major cities in primarily agriculture zones. Areas with a less positive economic outcome are found within major cities and away from agriculture, as seen in Figure 3-34. This could be attributed to the key role and value that agriculture plays throughout the region. In comparison, a concentration of higher job proximity index scores (score of 80 or higher) is seen within major cities throughout the region, as Figure 3-35 shows. Like Stanislaus County, rural areas of the region have a higher job proximity score than the established cities within the region. This distribution could be credited to the distance rural residents must travel to job centers found in major cities and in agriculture. Through Housing Plan Actions 5-1k and 5-1l, the County will promote economic development efforts through partnership with organizations to advertise employment opportunities to lower-income residents, and will continue to promote implementation of the Crows Landing Industrial Business Park Specific Plan to increase economic development and job opportunities. Other programs to support economic opportunity include Actions 5-1i and 5-1c.

Figure 3-32 TCAC Opportunity Areas – Economic, Stanislaus County

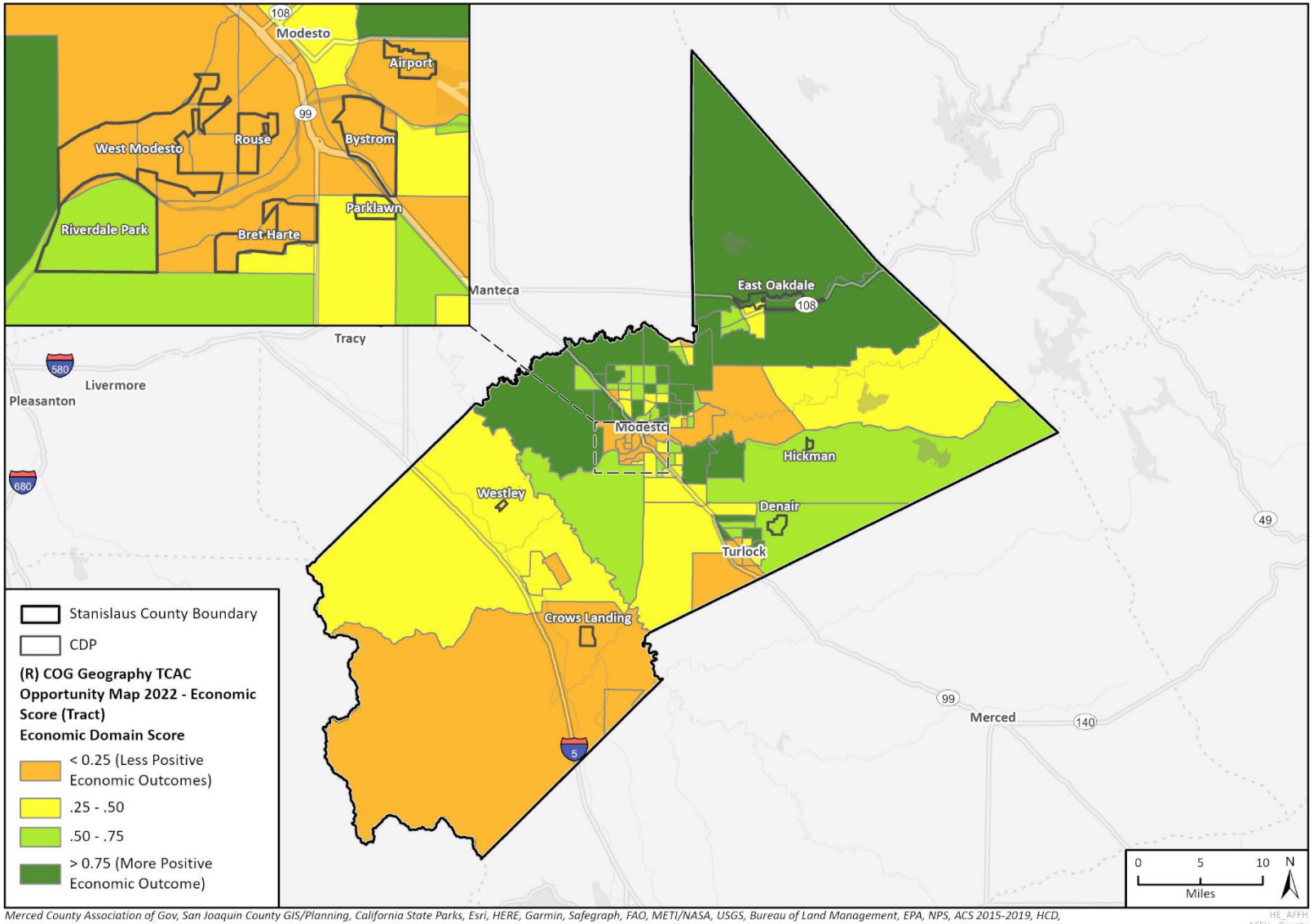


Figure 3-33 Jobs Proximity Index by Block Group, Stanislaus County

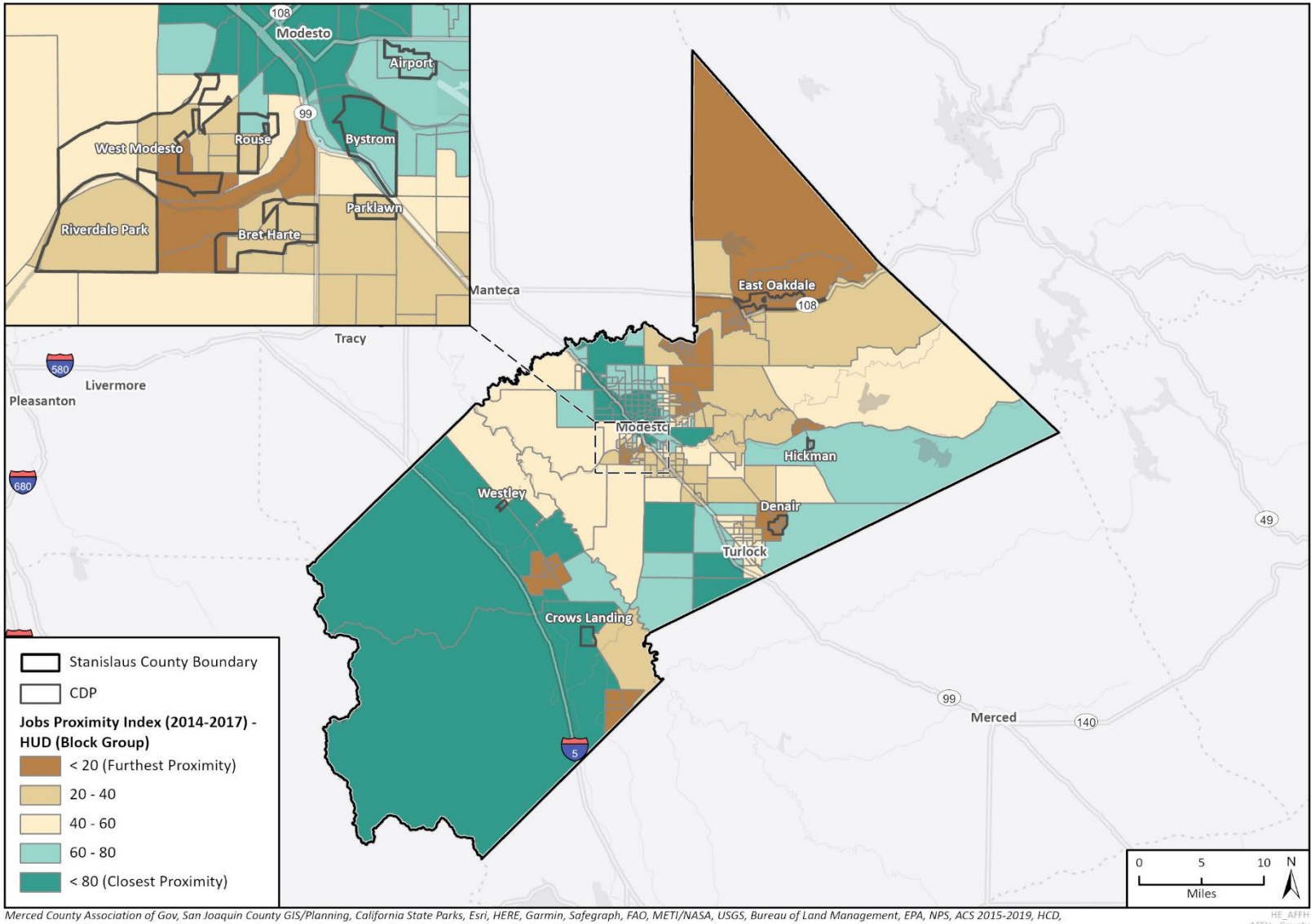
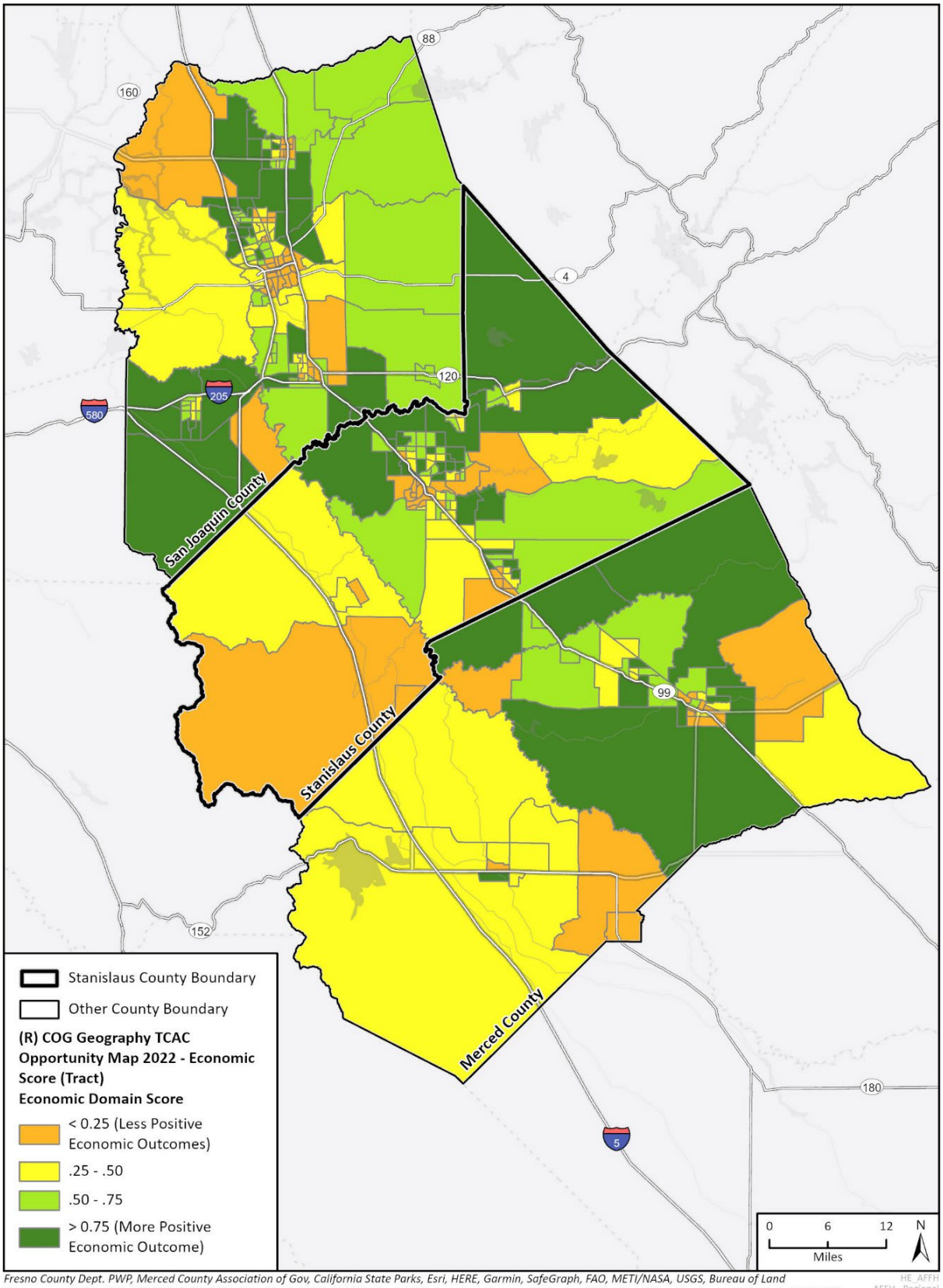


Figure 3-34 TCAC Opportunity Areas – Economic Score by Census Tract, Region



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

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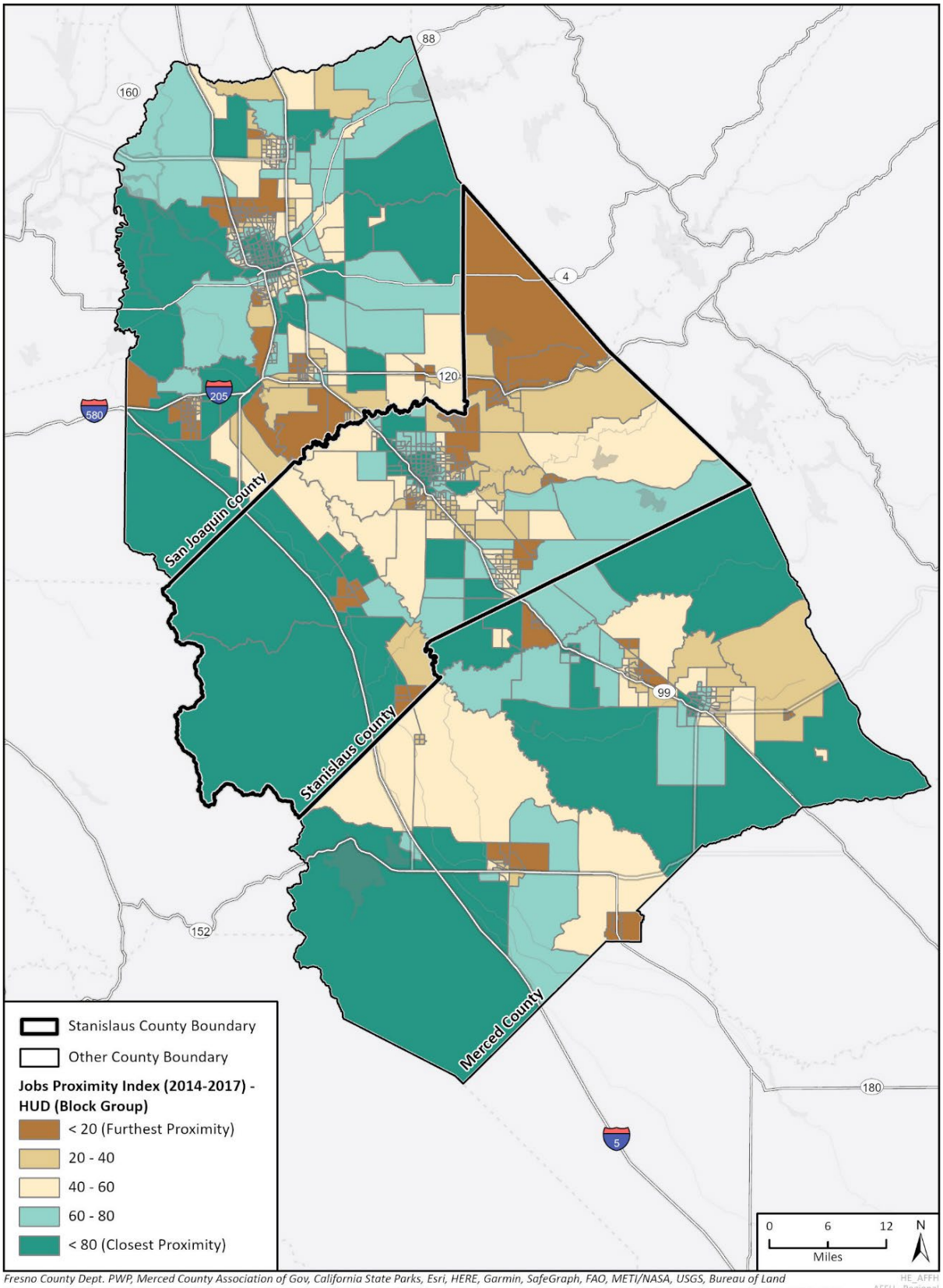
Figure 3-35 Jobs Proximity Index, Region



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

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Educational Opportunity

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

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

Local Trends

Stanislaus County has significant areas of contrast regarding access to educational opportunities, making this an impediment to fair housing. Areas of the County with more positive educational outcomes are concentrated in rural areas, including western, northern, and eastern parts of the County, while areas with less positive educational outcomes are concentrated in and near urban parts of the County, including the cities of Modesto and Turlock. A concentration of less positive education scores (<0.25) is in and around unincorporated Modesto's CDPs including West Modesto, Riverdale Park Tract, Bret Harte, Parklawn, Bystrom, and Airport, as shown in Figure 3-36. Empire and Salida received low scores in the range of 0.25 to 0.5. Most of the northeastern and southwestern areas of the County fall within the more positive scoring range between 0.5 to 0.75, like in the CDPs around East Oakdale, Westley, and Crows Landing. La Grange, Hickman, Keyes, and Denair are the CDPs that have the most positive education outcomes (0.75 to 1). Areas with less positive education outcomes overlap with areas that are predominantly Hispanic/Latino, have higher poverty rates, and a higher percentage of children living in female-headed households with no spouse present, and a higher percentage of older housing units (between 20 to 80 percent of housing units built prior to 1960). Areas with lower educational outcomes also overlap with areas with less positive economic outcomes, and higher pollution burden (Figure 3-36).

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

Regional Comparison

Similar to Stanislaus County, the region varies in its educational outcome score as seen in Figure 3-37. Regionally, areas with the more positive educational outcomes are in more rural areas surrounding city centers, whereas the less positive educational outcomes are in and around city centers.

Figure 3-36 TCAC Opportunity Area – Education Score, Stanislaus County

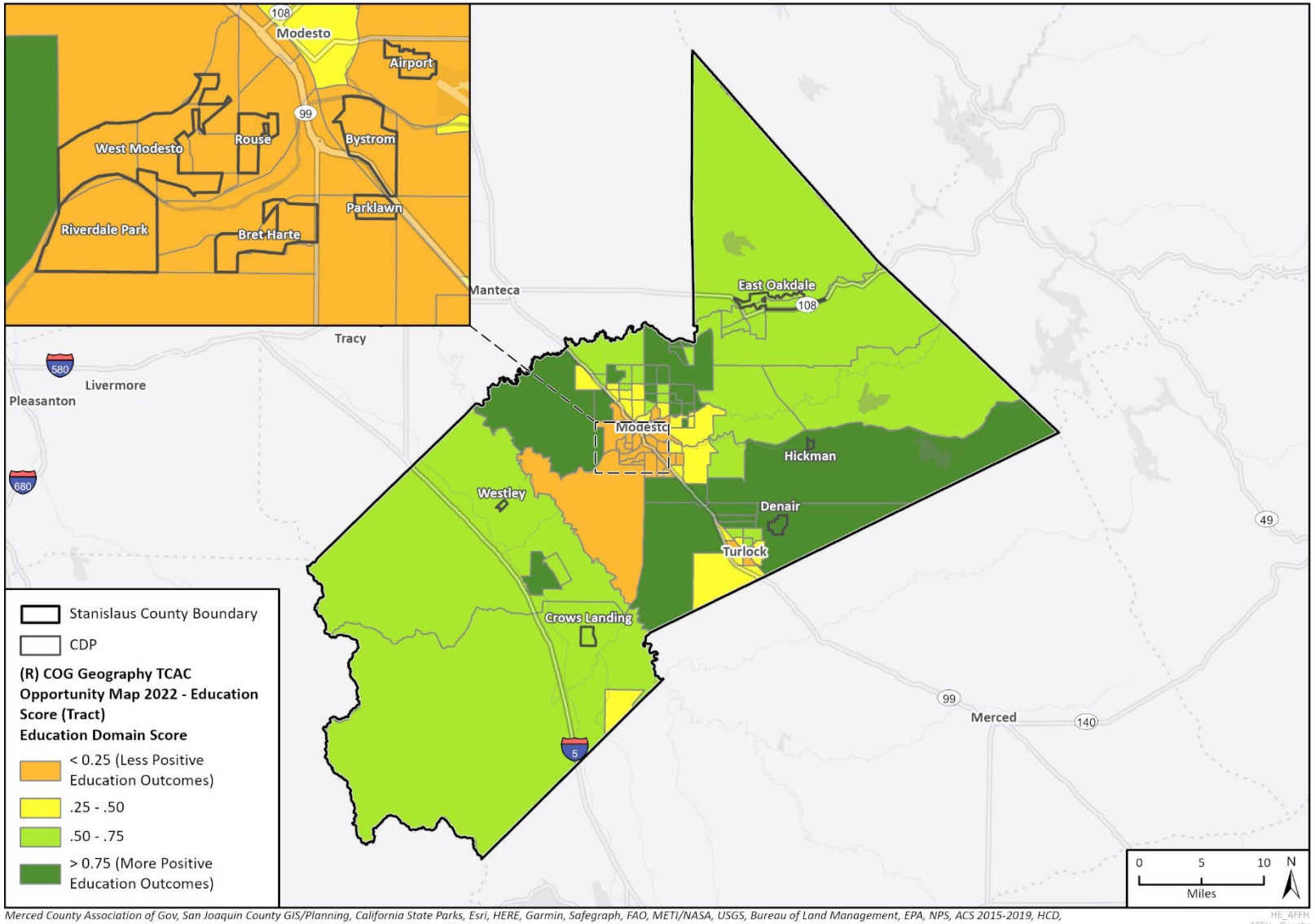
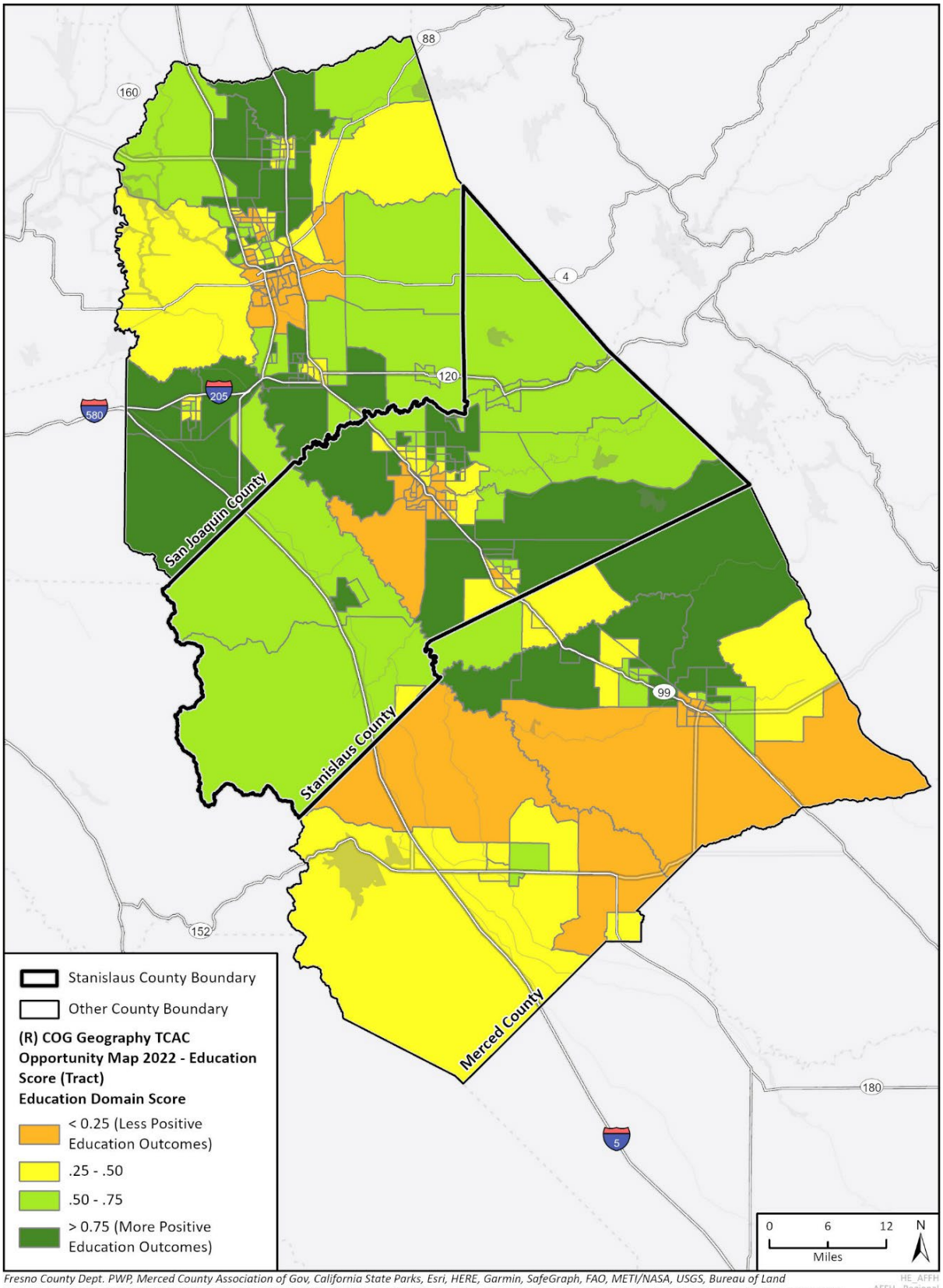


Figure 3-37 TCAC Opportunity Area – Education Score by Census Tract, Region



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

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Healthy Environment

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

Local Trends

Stanislaus County has an overall moderate to less positive environmental score. As shown in Figure 3-38, positive scores (0.75 to 1.0) were given to the CDPs of Crows Landing, East Oakdale, Orange Blossom, Knights Ferry, and Valley Home. Brett Harte and West Modesto have a relatively high environmental score of 0.50 to 0.75. All other CDPs fall within the lower range of environmental scoring between 0.5 and less than 0.25. Several CDPs, including many CDPs west of Highway 99, have the lowest positive environmental outcome of less than 0.25 (Westley, Riverdale Park Tract, Bystrom, Airport, and Empire), whereas CDPs east of the highway vary from 0.25 to 0.5, to less than 0.25 (East Oakdale, Hickman, and Denair). Parklawn, which is just west of Highway 99, also has an environmental score of 0.25 to 0.5.

The CalEnviroScreen map for Stanislaus County identifies the degree to which communities are considered burdened by pollution. Stanislaus County has a range of CalEnviroScreen scores, with percentile scores ranging from the 38th to the 100th percentile (Figure 3-39). Pollution burden is high throughout the County, and highest in the western portion of the County. Unincorporated parts of the County generally have high rates of pollution burden, particularly in the CDPs of West Modesto, Riverdale Park Tract, Rouse/Colorado, Bystrom, Airport, and Empire, which have percentile scores ranging from the 91st to 100th percentile, meaning pollution burden in these census tracts are higher than 91 to 100 percent of census tracts in the state. Pollution burden is lowest in the northern part of the cities of Modesto and Turlock, which have percentile scores as low as the 30th percentile. The eastern parts of the County have relatively lower pollution burden compared to the rest of the County, including the CDPs of Denair (59th percentile), Hickman, and La Grange (60th percentile), East Oakdale (70th percentile), Valley Home (66th percentile). CDPs throughout the rest of the County range from the 71st percentile to the 91st percentile. Pollution burden throughout the County is high due to drinking water contaminants, pesticide use, groundwater threats, and proximity to solid waste sites throughout the County. Western parts of the County, specifically areas surrounding and west of the San Joaquin River, have high levels of pollution burden due to proximity to cleanup sites and impaired waters. In addition to high levels of pollution burden, residents in western parts of the County have a high prevalence of population characteristics that make people more vulnerable to pollution, including low educational attainment levels, high poverty rates, and high unemployment rates.

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

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

SB 535 disadvantaged communities are generally lower-income and are disproportionately burdened by pollution. These communities are targeted for investment from proceeds of the State's Cap-and-Trade Program. Those funds are intended to improve public health, quality of life and economic opportunity, and reduce pollution that causes climate change. Most of the western half of Stanislaus County is considered a SB 535 disadvantaged community, including the entirety of the city of Patterson and the western parts of Modesto, Turlock, and Keyes (Figure 3-40). Parts of Oakdale, Riverbank, Waterford, and Empire are also disadvantaged communities. SB 535 disadvantaged communities heavily overlap areas that are predominantly Hispanic/Latino and overlaps with areas with higher percentages of LMI residents and less positive economic outcomes.

Stanislaus County has also identified disadvantaged unincorporated communities (DUCs) within its jurisdiction based on the following criteria:

- Identified community (Census-Designated Place, or CDP), with distinguishable boundaries, located within the unincorporated area of the County
- Developed, with 10 dwellings, or 12 or more registered voters
- Annual median income of households is less than 80 percent of the statewide median household income
- Outside of the sphere of influence (SOI) of any city

DUCs identified by the County, per SB 244 requirements codified in California Government Code Section 65302.10, requires the County to evaluate unincorporated communities located outside of a sphere of influence of a city. These areas are generally consistent with SB 535 disadvantaged communities as they are predominantly located on the eastern half of the County, east of Highway 99. However, the County considers Westley and Keyes as disadvantaged communities, which are not SB 535 disadvantaged communities. According to the County's Unincorporated Communities Report, DUCs in Stanislaus County generally have lower access to public services and transit, fewer public improvements such as street improvements and storm drainage systems, higher crime rates, lower median household incomes, and higher rates of chronic health conditions caused by air quality and prevalence of fast food compared to other areas of the County. In addition, residents of the DUCs have higher rates of obesity and asthma and lower life expectancy at birth compared to the national, state, and County averages[16].

According to the Unincorporated Communities Report, the following communities were identified as DUCs:

- Cowan Tract (approximately 318 residents, located one mile southwest of the city of Ceres): The Cowan Tract consists of approximately 94 households, almost all of whom live in mobile homes. The Cowan Tract lacks many improvements offered in incorporated cities, including sidewalks, bike lanes, curbs, gutters, and streetlights. The Cowan Tract is not served by any community service districts (CSDs) and instead relies on private wells and private septic systems. Fire protection services are provided by Westport Fire Protection District (FPRD) and fire protection in the Cowan Tract is considered low. Access to transit and healthy food options are also limited in the Cowan Tract.

[16] 2016. Stanislaus County. Appendix I-D Stanislaus County Disadvantaged Unincorporated Communities Report. https://www.stanCounty.com/planning/agenda/2016/08-04-16/EX_C_PT_2.pdf

- Crows Landing (approximately 244 residents, located six miles southeast of the City of Patterson and 13 miles southwest of the City of Turlock): According to the Unincorporated Communities Report, 41 percent of housing units in Crows Landing are in need of rehabilitation. Most of Crows Landing does not have sidewalks, curbs, or gutters. Water service is provided by the Crows Landing CSD and wastewater is disposed of through private septic systems. The existing water supply system, although in the process of being upgraded, relies on an aging system of pipelines that does not provide adequate water pressure during periods of peak demand. Obtaining funding to address infrastructure improvements is a challenge for the Crows Landing CSD. Access to healthy food options and grocery stores are limited in Crows Landing.
- Grayson (approximately 952 residents, located 11 miles southwest of the City of Modesto and 6.5 miles northwest of the City of Patterson): Most streets in Grayson have sidewalks, curbs, and gutters, however, 40 percent of housing units lack sidewalks. Water service is provided by the City of Modesto and wastewater and street lighting service is provided by the Grayson CSD. Grayson has adequate infrastructure and services, with the exception of the water supply system which has deficiencies related to pumping capacity and water pressure. Obtaining funding to address infrastructure improvements is a challenge. Crime rates in Grayson are higher than many of the other DUCs in the County.
- Keyes (approximately 5,601 residents, located one mile southeast of Ceres and the southern edge of Keyes is about one mile northwest of Turlock): Most streets in Keyes have curbs, gutters, and street lights, particularly in newer housing developments; however, several commercial areas lack curbs gutters and sidewalks. The Keyes CSD provides water services to Keyes and contracts with the City of Turlock to provide wastewater treatment service. Historically, water quality has been an issue in Keyes due to high levels of arsenic and 1,2,3-trichloropropane, above federal/state drinking water standards. Fire protection services are provided by the Keyes FPD, which includes one fire station located in Keyes, but fire protection in rural parts of Keyes is considered low.
- Monterey Park Tract (approximately 133 residents, located 4.5 miles southwest of the City of Ceres and seven miles west of the City of Turlock): The Monterey Park Tract lacks sidewalks, curbs, and gutters. The community also has very limited access to transit, as no bus service is available, and the community is outside the Turlock-Modesto Shuttle service area. Water service is provided by the City of Ceres. Historically, water quality has been an issue in the Monterey Park Tract due to high levels of nitrate, manganese, and arsenic. Wastewater is disposed of through private septic systems. Obtaining funding to address infrastructure improvements is a challenge. Fire protection services are provided by the Westport FPD with one fire station in the Monterey Park Tract and fire protection is considered low.
- Riverdale Park Tract (approximately 1,128 residents, located within the City of Modesto's SOI approximately 1 mile west of Modesto's city limit): The Riverdale Park Tract consists of five census blocks within the Riverdale Park Tract CDP. Transit access is low in the Riverdale Park Tract as most of the community lacks bus service. Most of the community falls immediately outside the service areas of three public curb-to-curb shuttle services. The Riverdale Park Tract is served by the Riverdale Park Tract CSD. The City of Modesto is currently in the process of connecting the Riverdale Park Tract to the City's municipal water system. The Riverdale Park Tract does not have a storm drainage system or sewer system.
- Westley (approximately 603 residents, located 5.5 miles north of the City of Patterson): The Stanislaus County Housing Authority operates the 88-unit Westley Migrant Center in Westley. The eastern portion of Westley lacks curbs, gutters, and sidewalks. Water and wastewater services in Westley are provided by the Westley CSD. Westley does not have a stormwater drainage system. The Westley CSD currently meets the needs of its customers; however, major repairs to the water

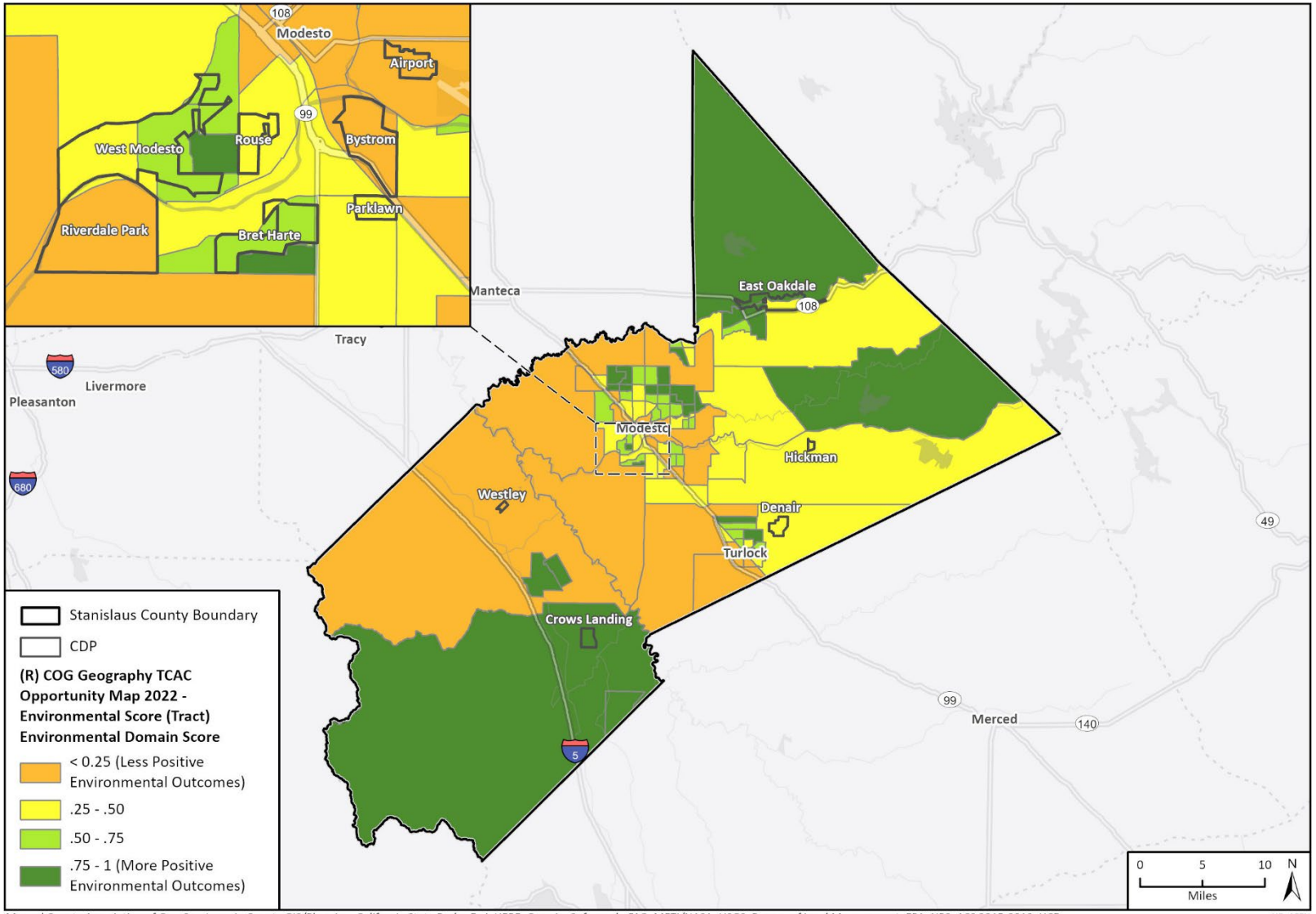
system will be necessary in the near future and the wastewater treatment plant is operating at capacity. Obtaining funding to address infrastructure improvements is a challenge. There are no public parks in Westley and the nearest parks are approximately two miles east of the community, in Grayson.

While the Unincorporated Communities Report only identifies unincorporated areas within the county which are located outside of a sphere of influence of a city as disadvantaged communities, the County has included unincorporated County pockets and islands, which are located within the sphere of influence of a city, in this document; described further in Section 3.16.4 *Unincorporated County Pockets/Islands*, below, as disadvantaged communities. This section also provides more recent information on the provision of infrastructure and services in disadvantaged communities in the unincorporated county.

Regional Comparison

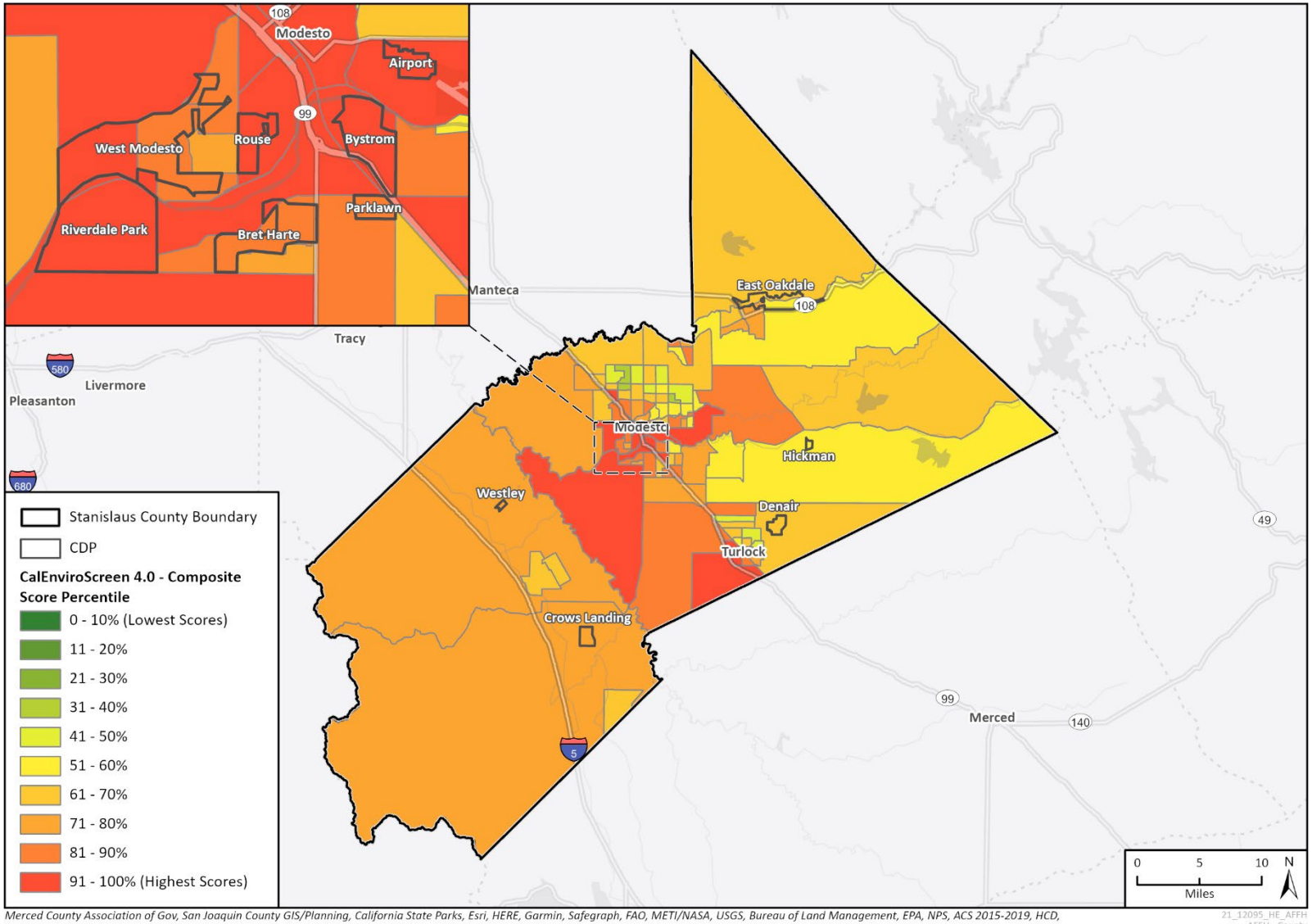
Stanislaus County compares similarly to the region in its distribution of environmental domain scores. In areas where agriculture is more prominent, environmental scores are worse throughout the region as seen in Figure 3-41. Areas with a more positive score vary from within city centers and in the mountainous areas of the region.

Figure 3-38 TCAC Opportunity Area – Environmental Score, Stanislaus County



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

Figure 3-39 CalEnviroScreen 4.0 Percentile Scores, Stanislaus County



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

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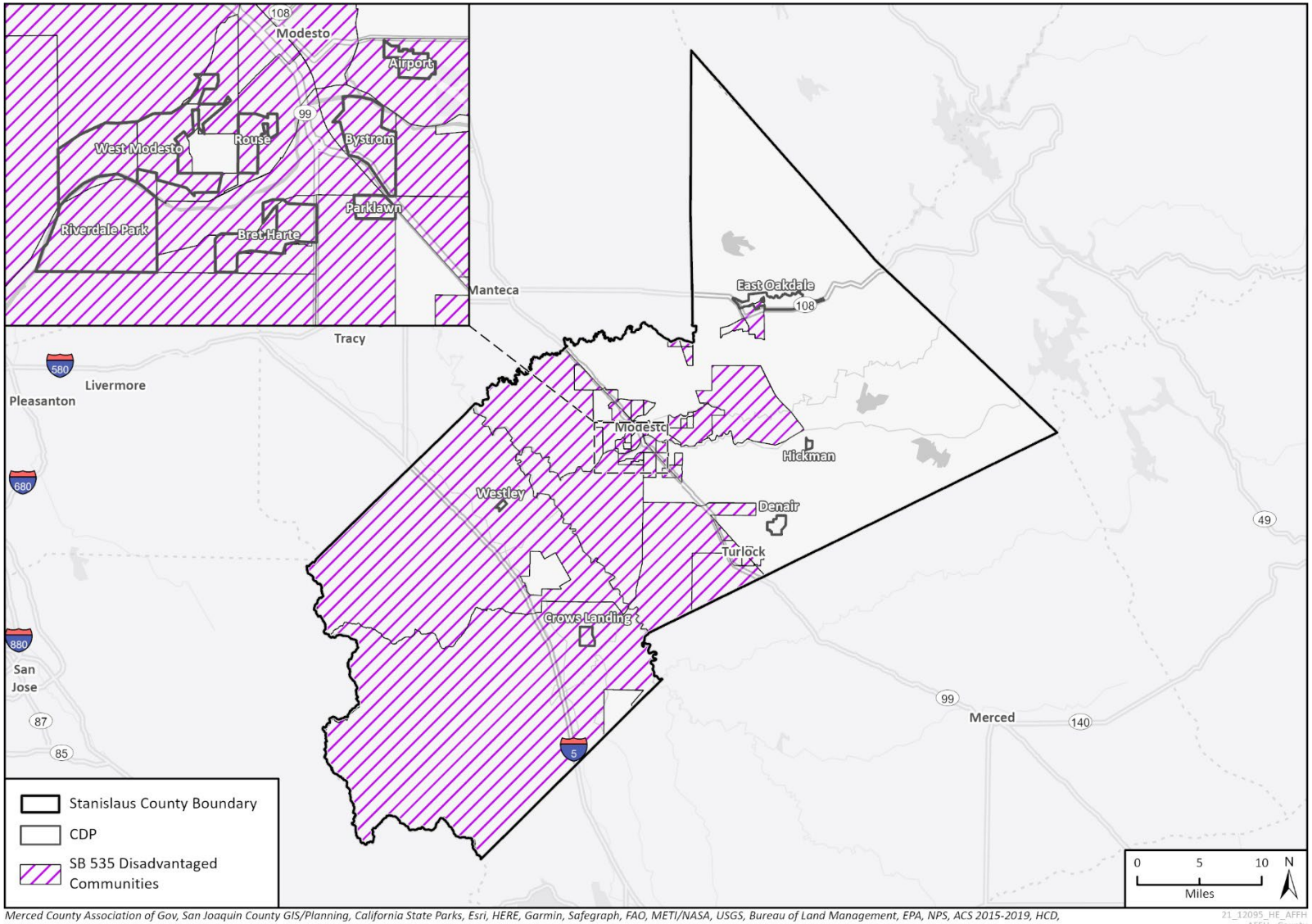
Figure 3-40 SB 535 Disadvantaged Communities, Stanislaus County



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

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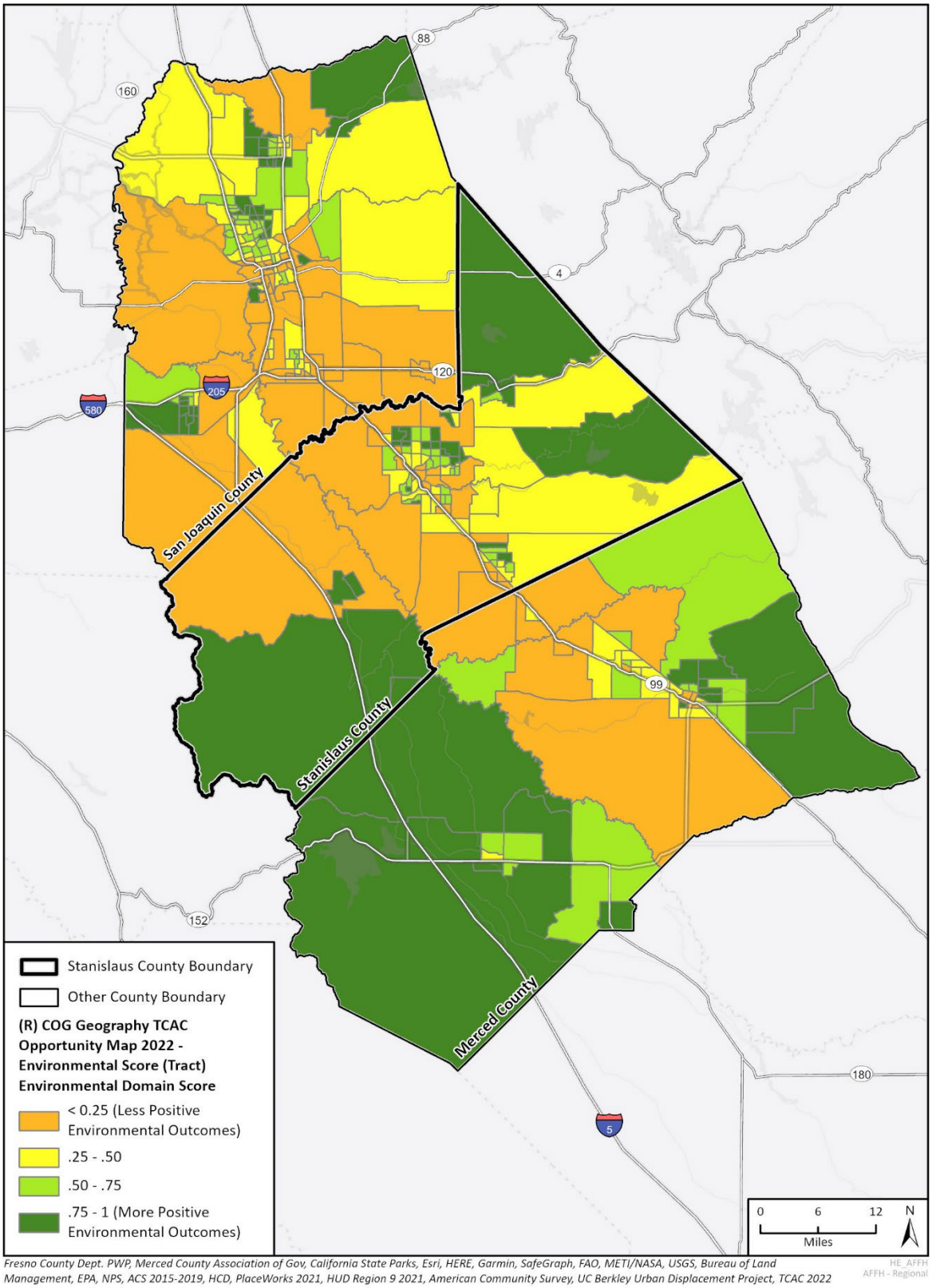
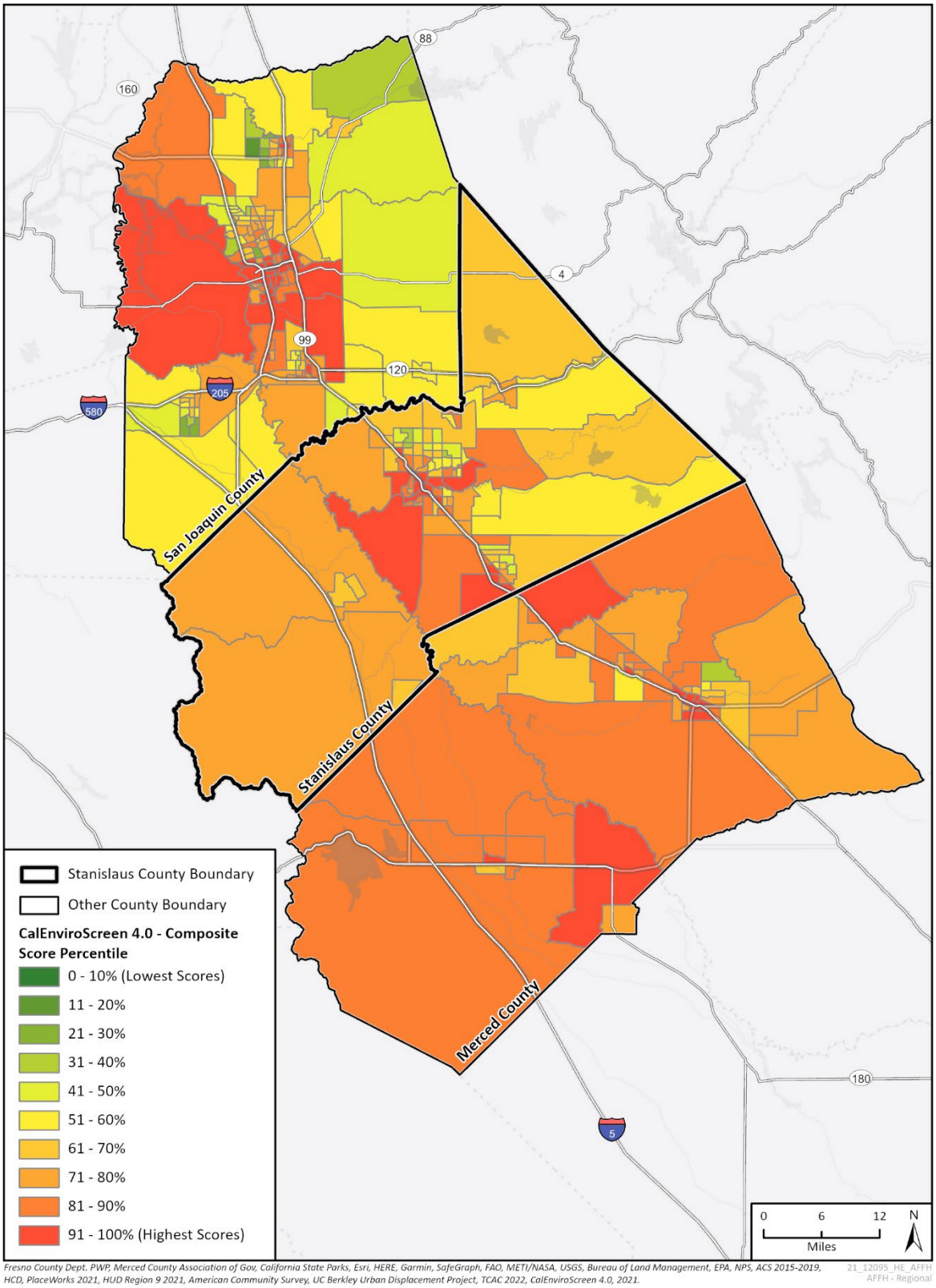
Figure 3-41 TCAC Opportunity Area – Environmental Score by Census Tract, Region



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

Figure 3-42 CalEnviroScreen 4.0 Percentile Scores, Region



3.11.3 Access to Transportation and Location Affordability Index

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

Local Trends

Stanislaus County has an AllTransit Performance Score of 3.6, meaning that there is a low combination of trips per week and a low number of accessible jobs, enabling few people to take transit to work.[17] On average, only 0.84 percent of commuters use transit in the County, which could be due to the low number of transit routes available. However, 73.5 percent of households live within a half mile of transit and 71.4 percent of jobs are located within a half mile of transit.

High-quality transit stops are defined by state law as those with an existing rail or bus rapid transit station, ferry terminal served by either a bus or rail transit service, or with an intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. In Stanislaus County, high-quality transit stops are concentrated in urban areas within the cities of Modesto, Ceres, Turlock, and Patterson (Figure 3-43). Unincorporated parts of the County, including communities adjacent to incorporated cities, generally do not have any high quality-transit stops. However, there are a few high-quality transit stops in the CDPs of West Modesto, Rouse/Colorado, and Parklawn. Community feedback also indicated that access to transit is unreliable in unincorporated parts of the County. Additionally, as part of the American Rescue Plan Act (ARPA) funding community engagement process, residents expressed dissatisfaction with the availability of pedestrian and bicycle infrastructure in West Modesto and Bret Harte/South Modesto, Airport, and South Turlock. Residents were particularly concerned about the lack of bicycle and pedestrian infrastructure impacts to safety, particularly for children.[18]

Based on the Location Affordability Index provided by HUD and DOT Stanislaus County, many renters cannot afford greater rents than $1,000 a month when considering transportation related costs. As shown in Figure 3-44, renters with greater economic opportunity who live nearby city centers can afford greater median gross rents than those renters who are located further from the city centers and thus job opportunities. The CDPs of Riverdale Park Tract, West Modesto, and Parklawn have higher median rent prices, between $1,500 and $2,000 per month, while CDPs further from urban areas, including East Oakdale, Valley Home, Crows Landing, Westley, Hickman, Empire, and Denair have lower median rent prices, below $1,000 per month.

Transit and jobs are not accessible throughout the County, and are more accessible in more densely developed areas, as indicated by AllTransit score. When transportation costs are added to affordability, those who can afford less rent can expect to pay greater costs related to transportation. Typically, these areas are within the CDPs in rural agricultural areas, rural foothill, and mountainous

[17] *AllTransit Metrics, Stanislaus County, CA. https://alltransit.cnt.org/metrics/?addr=modesto#ma*
[18] CivicMic. Findings and Recommendations Report; Public Engagement in Unincorporated Areas. June 2022 .

areas, because of longer commutes and thereby increased transportation costs such as fuel and vehicle maintenance.

Regional Trends

Comparing Stanislaus County's AllTransit score to the region, Stanislaus County has the highest performance score leading slightly ahead of San Joaquin County at 3.0 and Merced County at 2.4. However, in the other counties there is a higher percentage of commuters who use transit that have access to a similar number of transit routes. This indicates that there are more residents commuting within the other counties in the region.

Similar to Stanislaus County, high-quality transit stops in the rest of the Northern San Joaquin Valley are located in urban areas, primarily in the cities of Stockton and Merced (Figure 3-13).

Stanislaus County has a relatively moderate location affordability index compared to the region. As illustrated in Figure 3-45, Stanislaus County has more areas where renters cannot afford greater rents than $1,500 a month than Merced County, but fewer areas compared to San Joaquin County. Throughout the region, renters near the city centers can afford rents of higher monthly costs when considering transportation costs, as they are expected to spend less on transportation costs. Through Housing Plan Action 5-1j, the County will improve access to non-motorized and public transportation by coordinating with regional agencies to improve transit routes and leverage funding to improve pedestrian and other non-motorized transportation infrastructure, such as bike lanes, in Low Resource areas, in alignment with the County's Circulation Element.

Figure 3-43 High Quality Transit Stops, Stanislaus County

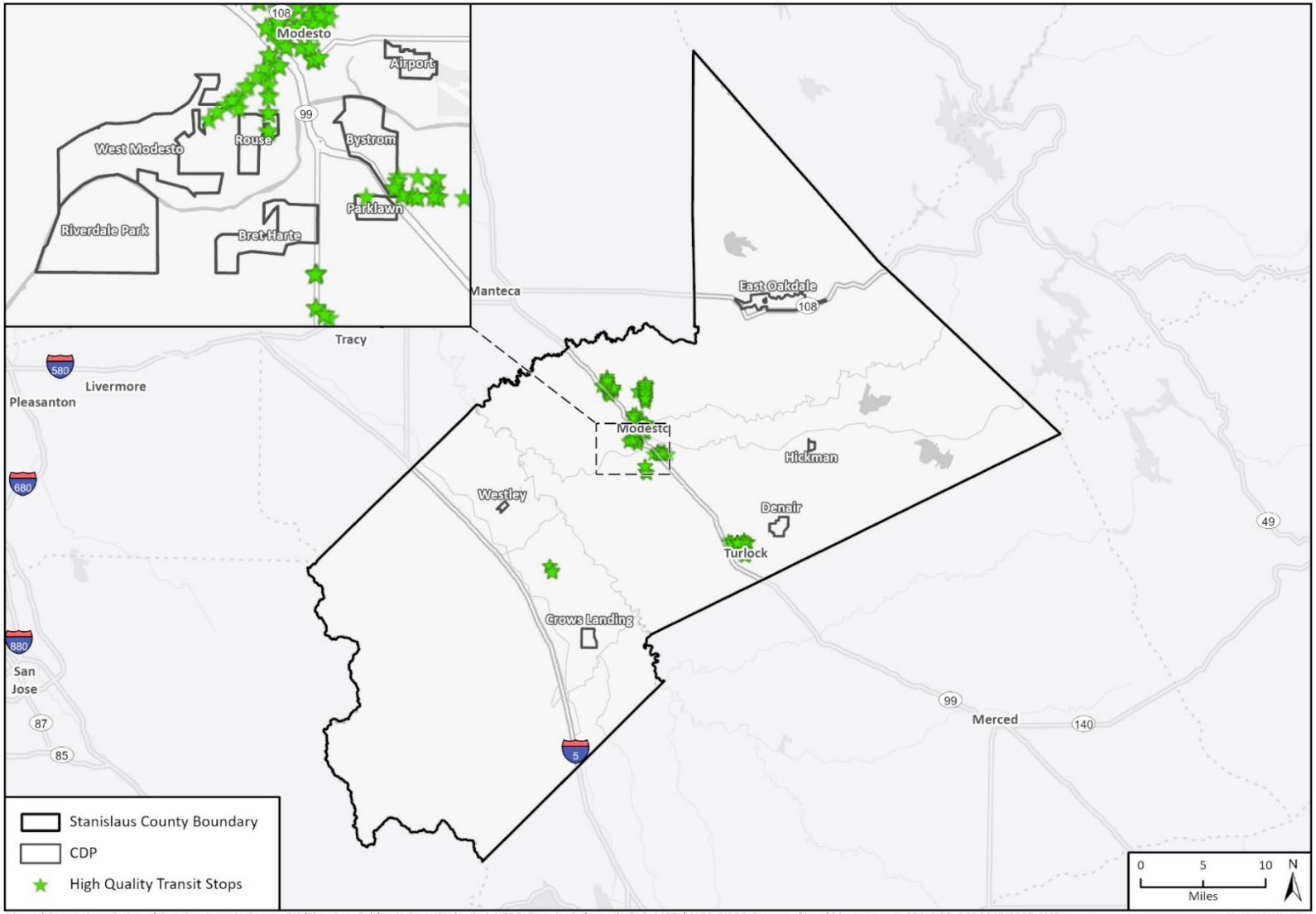


Figure 3-44 Location Affordability Index (HUD), Stanislaus County

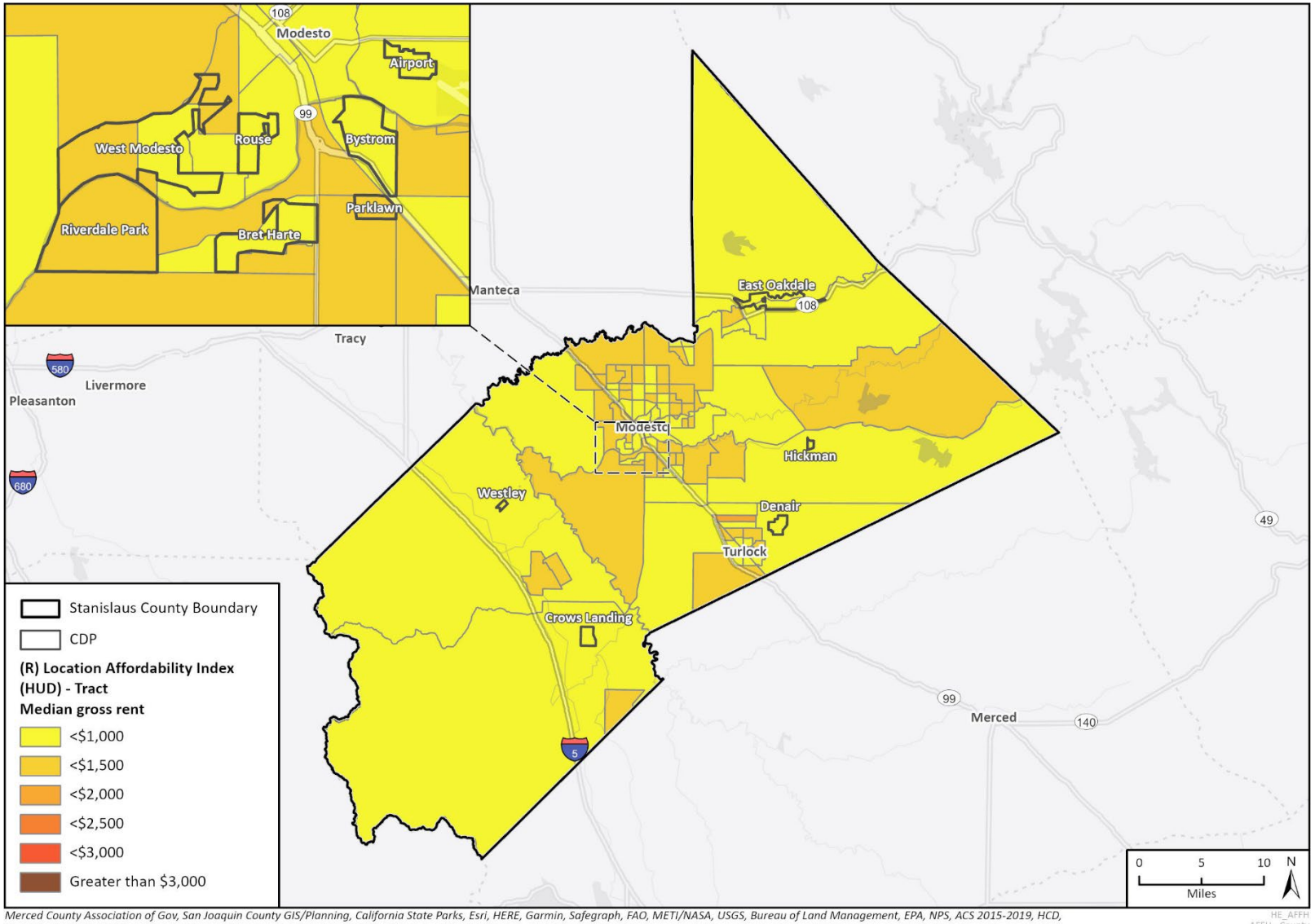
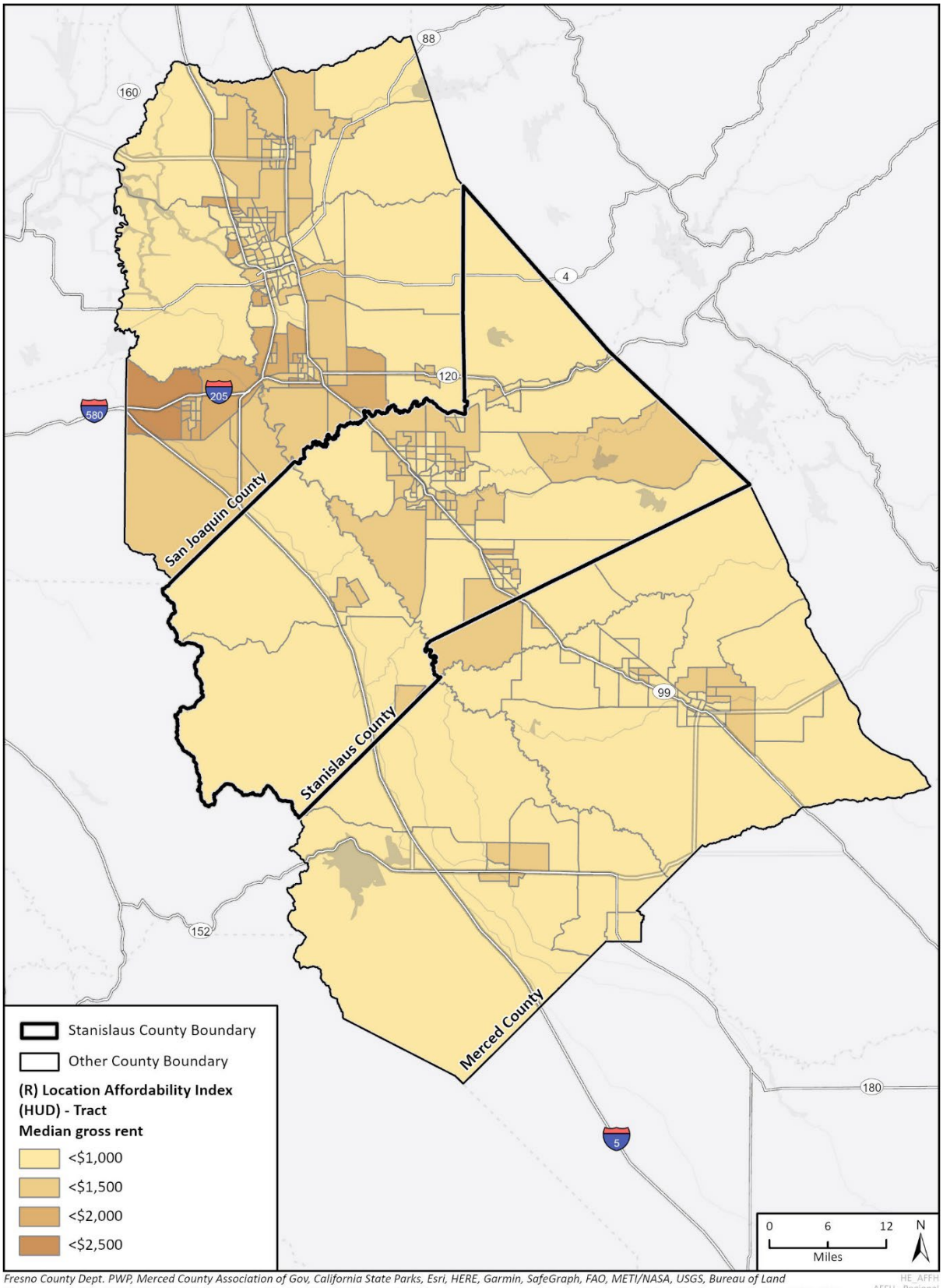


Figure 3-45 Location Affordability Index (HUD), Region



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3.12 Disproportionate Housing Needs

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

3.12.1 Overpayment

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

Local Trends

Throughout the County, the percentage of renter households whose gross rent (contract rent plus tenant-paid utilities) is 30 percent or more of the household income is concentrated in urban areas and is higher within the South Modesto CDPs, Patterson, and Riverbank. In Rouse/Colorado, Bystrom, and Bret Harte, 60 to 80 percent of households overpay rent, as seen in Figure 3-46. Areas with a higher rate of overpayment among renter households overlap with areas with a higher percentage of non-white residents, higher poverty rates, higher percentage of renter-occupied housing units, and higher percentage of older housing units (between 40 to 90 percent of housing units built prior to 1960). Bystrom and Rouse/Colorado are also affected by overpayment for owner households where mortgages cost more than 30 percent of the household income. Westley, Grayson, and Diablo Grande are also affected, with 40 to 60 percent of owner households overpaying, as Figure 3-47 shows. In contrast to overpayment by renters, overpayment by homeowners is prevalent in urban and rural parts of the County. Most areas with a high degree of overpayment by renters are predominantly Hispanic/Latino and overlap. Areas with high rates of overpayment by renters and homeowners heavily overlap with areas with higher poverty rates.

Stanislaus County shows similar trends in overpayment to the state. As shown in Table 3-14, 27 percent of all owner households and 48 percent of renter households were overpaying for housing in Stanislaus County in 2019. These findings are similar to the population of households overpaying statewide (30 percent among owners; 50 percent among renters). When looking at cost burden by income category, Stanislaus County and California follow similar patterns. Table 3-15 shows that 68 percent of lower-income households in Stanislaus County are cost burdened and 36 percent are severely cost-burdened. Almost identically, the statewide lower-income households rate is 66 percent cost burdened and 37 percent severely cost burdened. In both areas, very few above-moderate income households are overpaying for housing.

Table 3-14 Overpaying Households

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

Source: HUD, CHAS data 2015-2019.

Table 3-15 Cost Burdened Households by Income Category (Renters and Owners)

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

Source: CHAS data 2015-2019

Regional Comparison

In comparison to the Northern San Joaquin Valley, Stanislaus County has a similar distribution of households who overpay for rent and mortgages. Throughout the region most overpayment for renters is occurring in major cities, as shown in Figure 3-48. Distribution of owners overpaying for mortgages is slightly higher in the other counties compared to Stanislaus, where a larger number of households fall within the 60 to over 80 percent overpayment range (Figure 3-49).

Figure 3-46 Overypayment by Renters, Stanislaus County

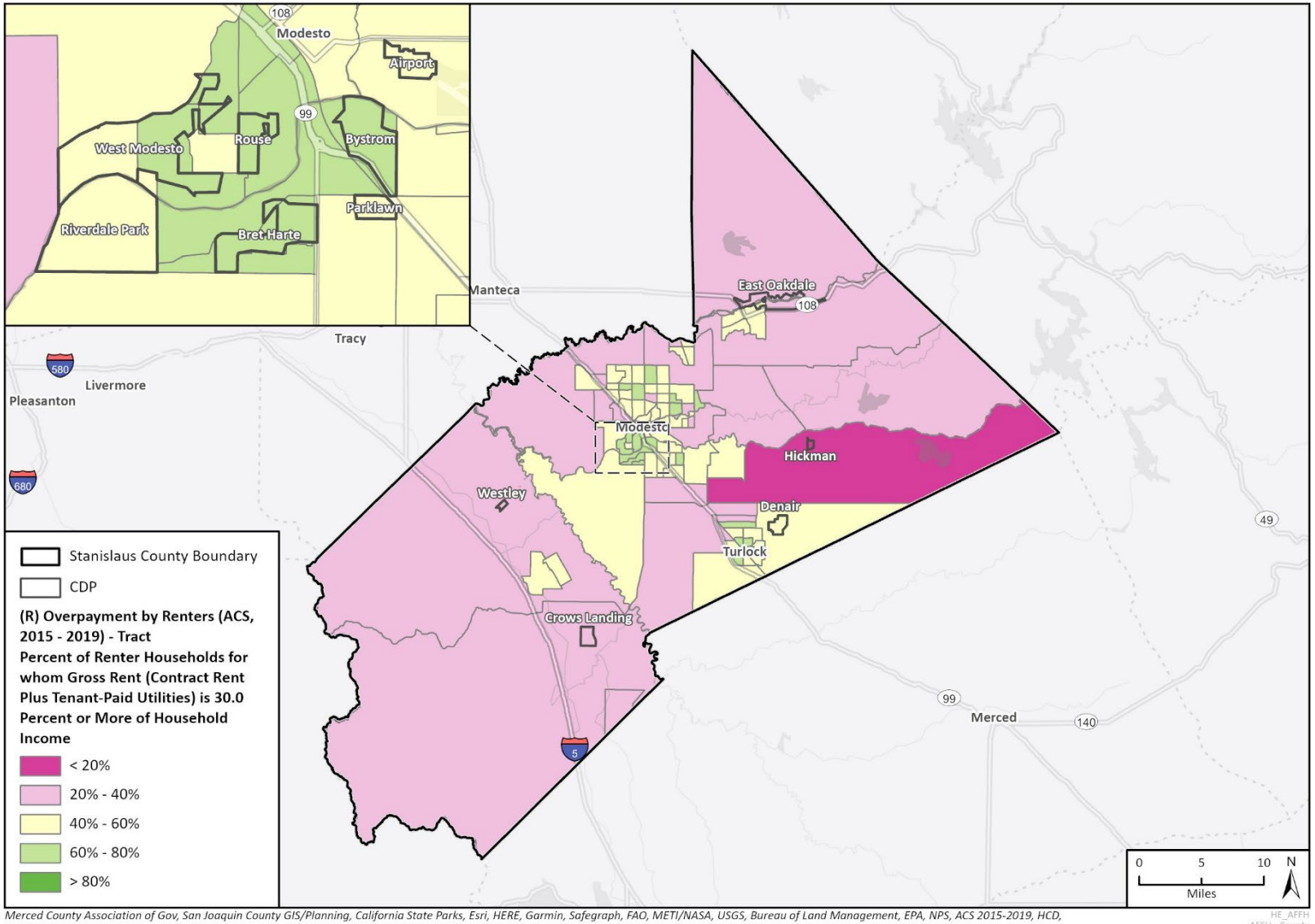

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Figure 3-47 Overpayment by Home Owners, Stanislaus County

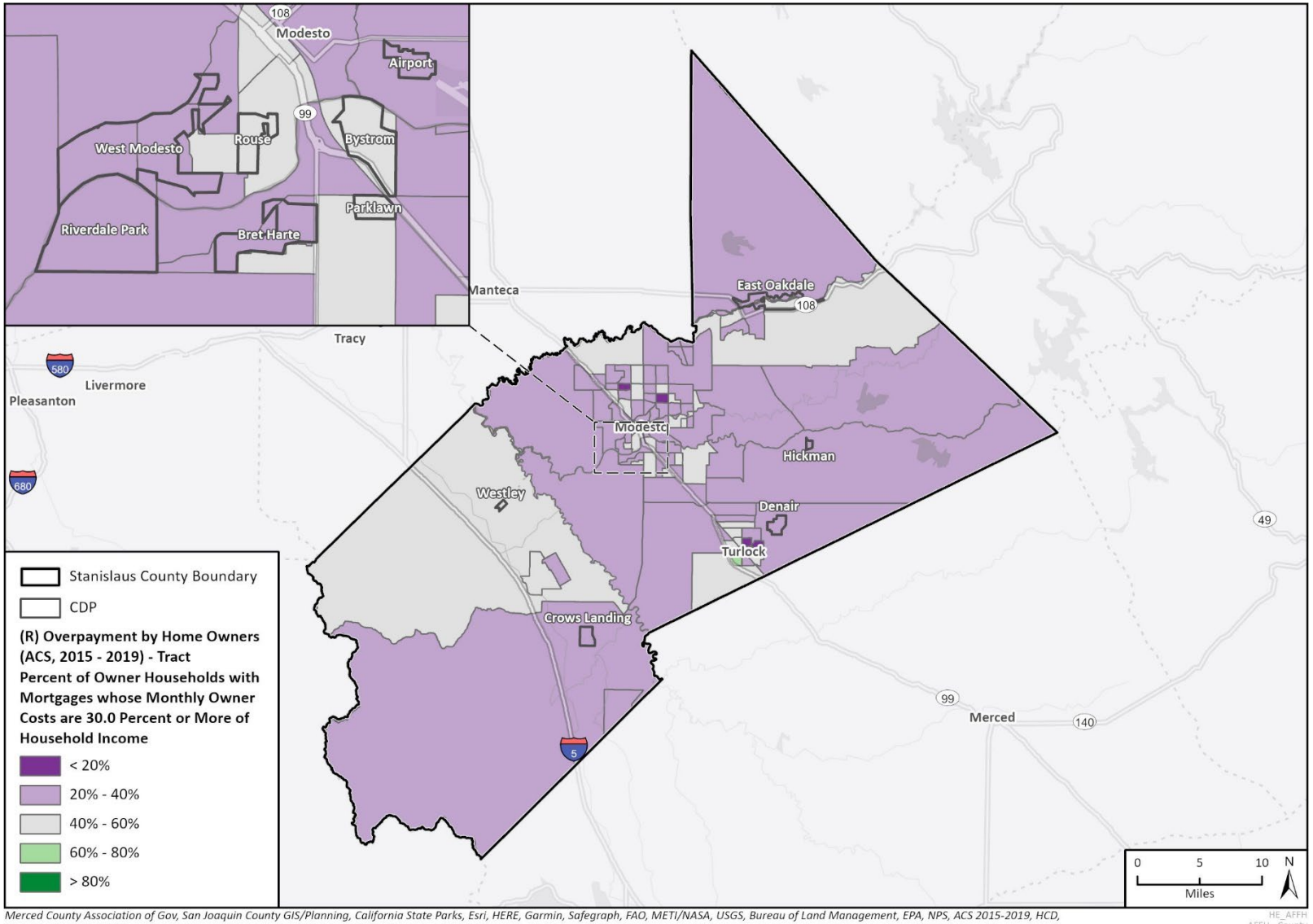

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Figure 3-48 Overpayment by Renters, Region

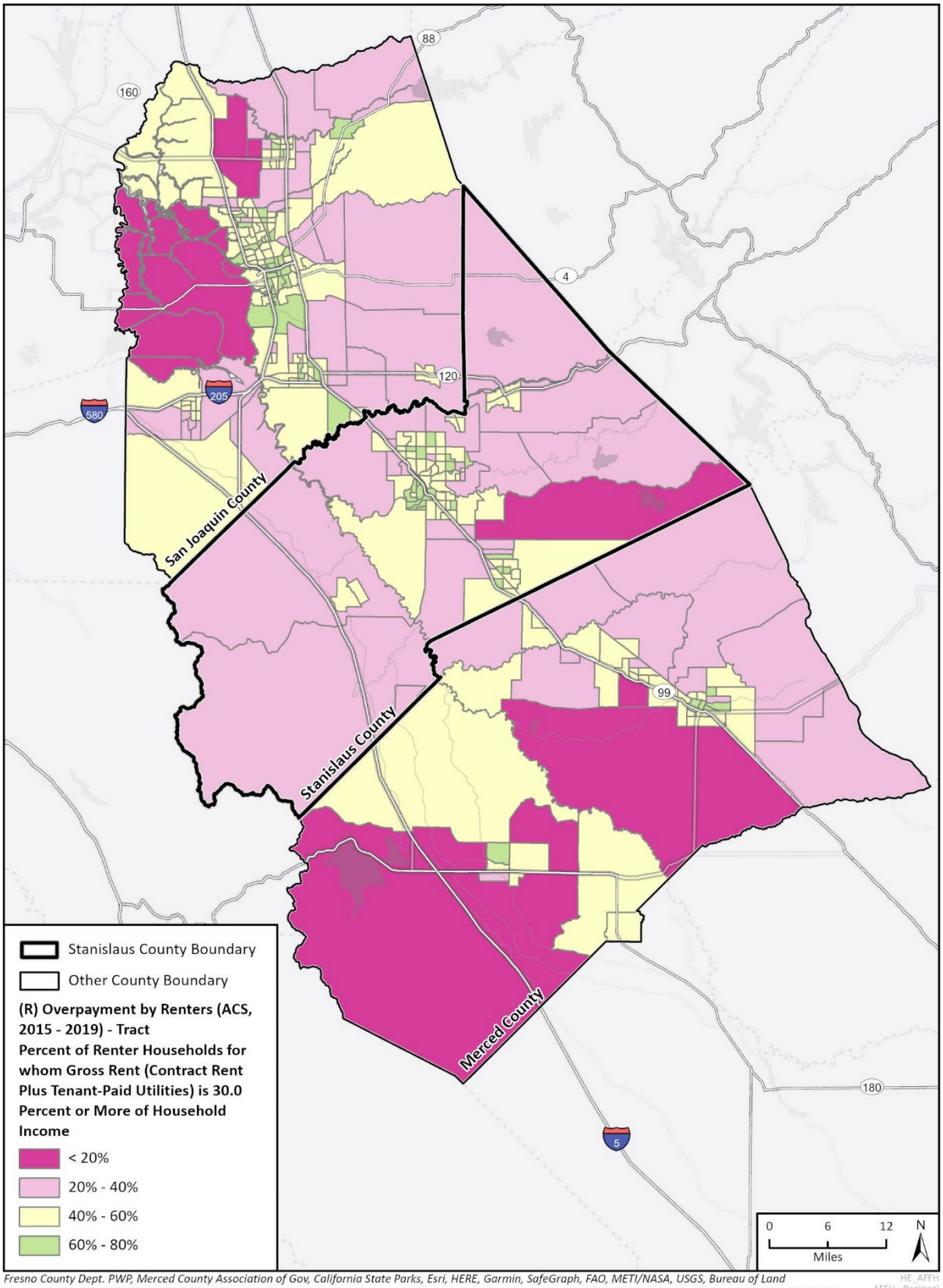

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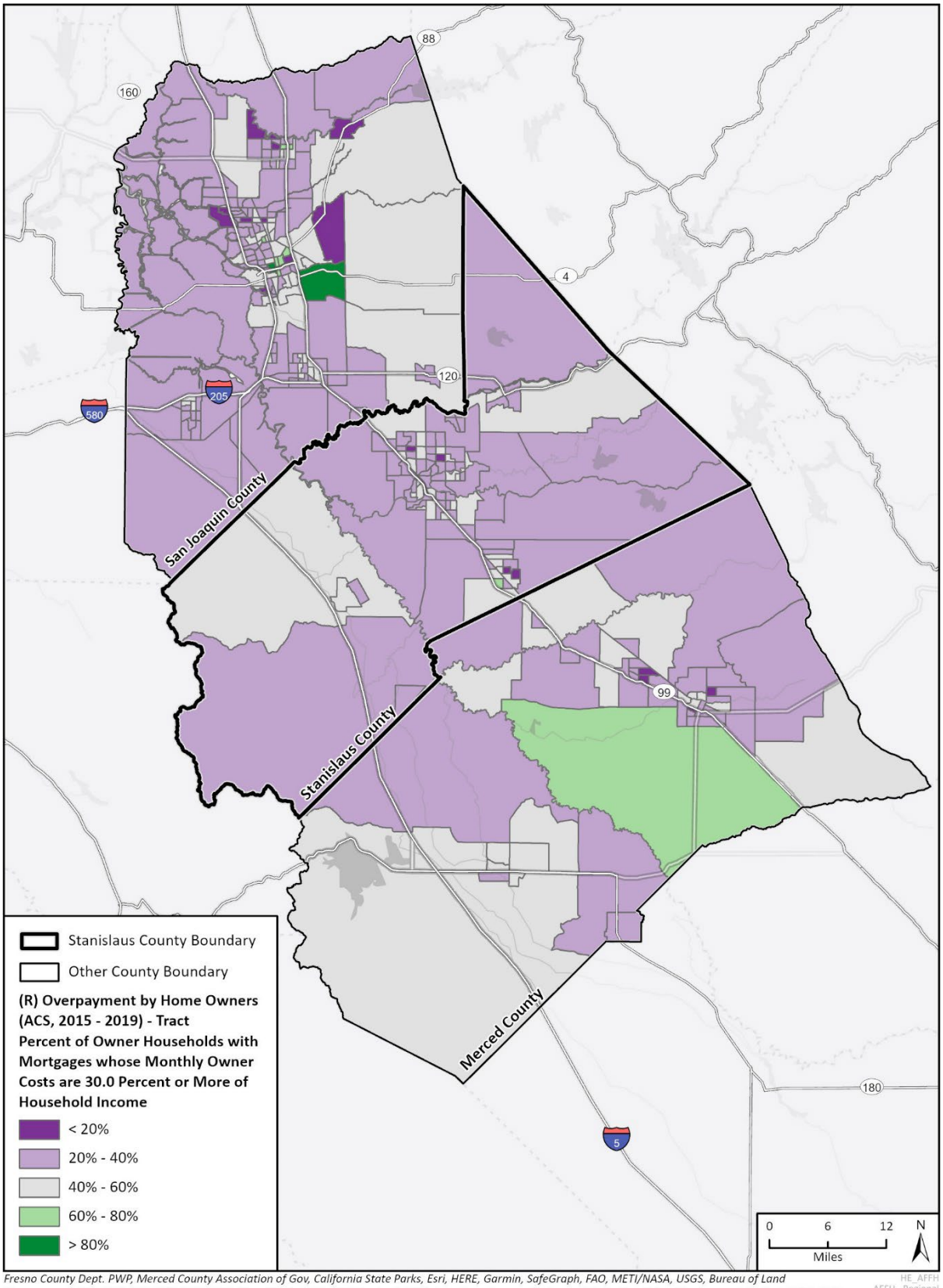
Figure 3-49 Overpayment by Home Owners, Region



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

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3.12.2 Overcrowding

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

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

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

Local Trends

Overcrowding in Stanislaus County falls at or above the statewide average of 8.2 percent, with most of the County in the 8.2 to 12 percent range. The highest percentage of overcrowding (above 20 percent) within the County is in the Rouse/Colorado, Bystrom, and Airport areas, as seen in Figure 3-50. CDPs with the lowest rate of overcrowding include East Oakdale, Valley Home, Crows Landing, Hickman, La Grande, and Denair, where less than 8.2 percent of households are overcrowded. According to the 2020 ACS 5-year estimates, overcrowding was very similar in Stanislaus County and the state (see Table 3-16). However, severe overcrowding in the state of 6.38 percent was much higher than rates in Stanislaus at 3.39 percent. Areas with higher rates of overcrowding overlap with Low Resource areas and areas of high segregation and poverty, particularly with areas with less positive economic outcomes and less positive environmental scores. In addition, areas with higher rates of overcrowding also overlap with areas that are predominantly Hispanic/Latino, have higher poverty rates, have a higher percentage of renter occupied housing units, have less positive economic outcomes, and have a high pollution burden.

In Stanislaus County, other race, Hispanic, and multi-racial households have the highest percentage of overcrowding, as shown in Table 3-17. White, non-Hispanic/Latino residents have significantly lower rates of overcrowding (three percent) compared to all other racial/ethnic groups.

Table 3-16 Overcrowded Households

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

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

Table 3-17 Overcrowded Households by Race/Ethnicity, Stanislaus County

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

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

Regional Comparison

Regarding overcrowding throughout the Northern San Joaquin Valley, Stanislaus County compares similarly or slightly above the other counties. Stanislaus County has fewer areas with a higher percentage of overcrowding (15.01- over 20 percent) compared to the region, as seen in Figure 3-52. Areas of overcrowding are consistently seen in major cities and in some cases in surrounding agricultural lands. Stanislaus County and San Joaquin County do not have any concentrations of severely overcrowded households, whereas the northmost area of Merced County has a concentrated area of severely overcrowded households (Figure 3-53).

3.12.3 Housing Problems

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

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

Local Trends

There are a number of areas in Stanislaus County that have severe housing problems. Figure 3-51 shows areas that experience one or more severe housing problems fall within the 20 to 40 percent range. The few areas within the County where 40 to 60 percent of households have severe housing problems are in the South Modesto CDPs of Bret Harte, and Riverdale Park Tract, as well as Bystrom and Airport. In the CDPs of West Modesto, Parklawn, Hickman, Crows Landing, and Denair, between 20 and 40 percent of households experience severe housing problems. East Oakdale, Valley Home,

and Denair have the lowest percentage of households experiencing severe housing problems, less than 20 percent.

According to 2017-2021 ACS estimates, Stanislaus County has approximately 1,966 substandard housing units, which comprises about one percent of the total occupied units in the County. Of the 1,966 substandard housing units, 33 percent (650 units) lack complete plumbing and 67 percent (1,316 units) lack complete kitchen facilities. Older units have higher rates of substandard units. According to the 2017-2021 ACS estimates, census tracts with a higher share of substandard housing units are primarily located in and near the city of Modesto and in the cities of Oakdale, Turlock, and Riverbank. Within the unincorporated parts of the County, areas with a higher share of substandard housing units include the CDPs of Bret Harte (10 units lack a complete kitchen, 0.8 percent of total occupied housing units), Bystrom (21 units lack complete plumbing and 14 units lack a complete kitchen, 1.8 and 1.2 percent of total occupied housing units), Empire (70 units lack complete plumbing and 28 units lack a complete kitchen, 6.0 and 3.4 percent of total occupied housing units), and Salida (12 units lack complete plumbing and 14 units lack a complete kitchen, 0.3 and 0.3 percent of total occupied housing units). In addition, unincorporated areas just outside the City of Riverbank, Census Tracts 4.05 and 4.07, have higher rates of substandard housing units that lack complete plumbing (1.3 to 2.1 percent of total occupied housing units). The area north of the City of Hughson, Census Tract 29.04, has a higher rate of substandard housing units that lack a complete kitchen (4.6 percent of total occupied housing units).

Regional Comparison

The distribution of households with severe housing problems is displayed in Figure 3-54. Households with severe housing problems are seen in major cities and along major highways throughout the region.

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

Figure 3-50 Overcrowded Households, Stanislaus County

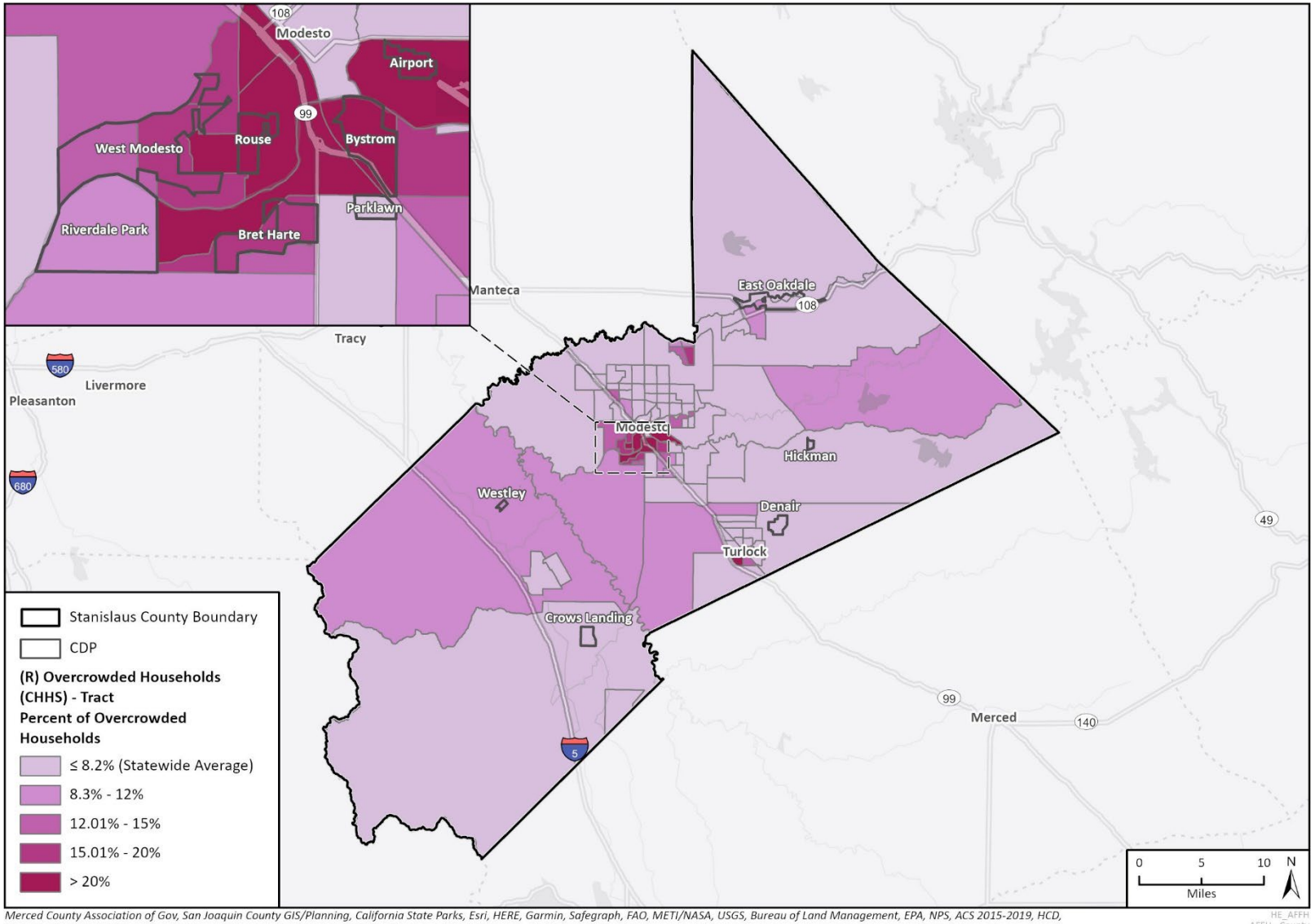

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Figure 3-51 Percent of Households with Severe Housing Problems, Stanislaus County

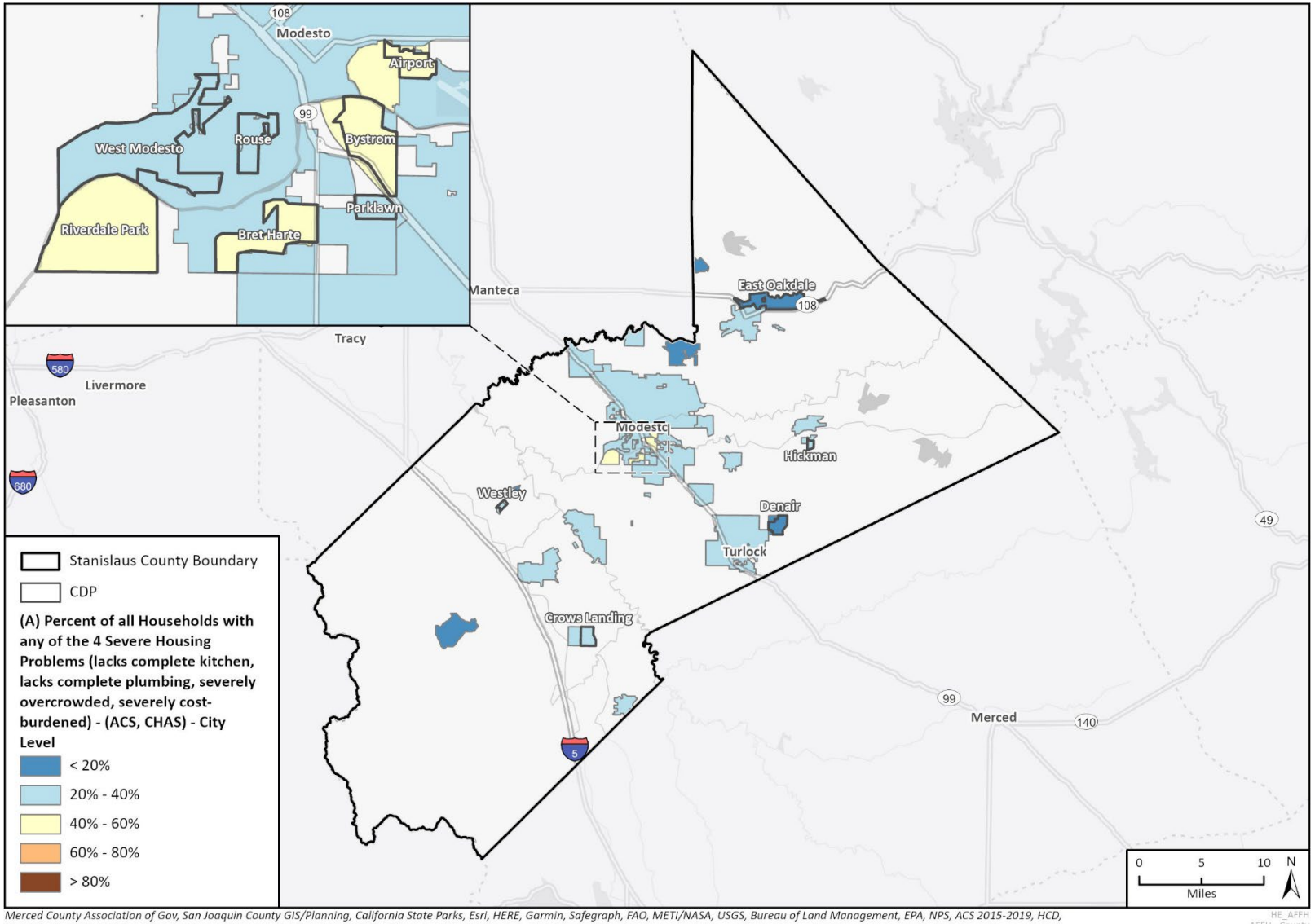

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Figure 3-52 Overcrowded Households, Region

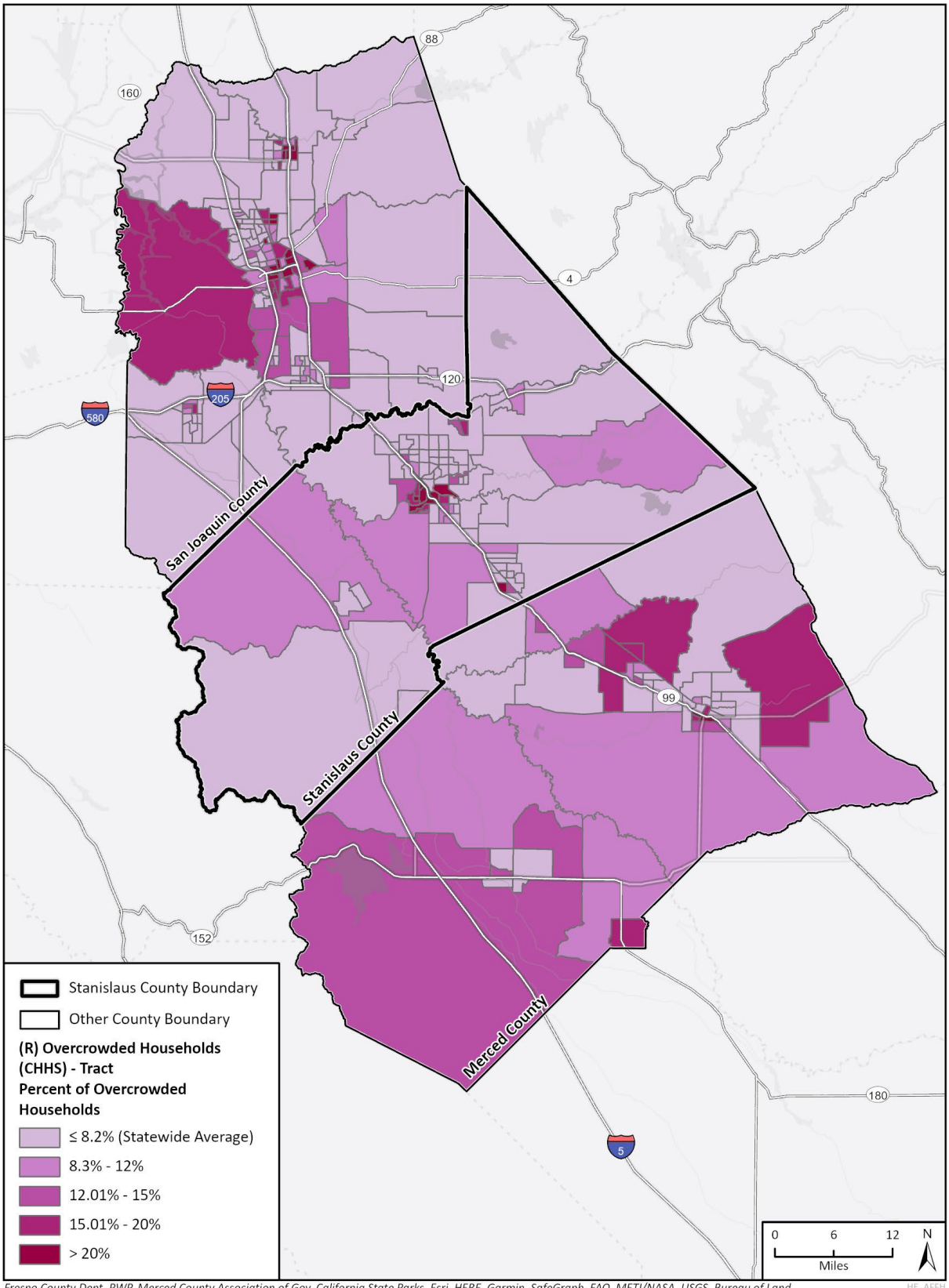

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Figure 3-53 Severely Overcrowded Households, Region

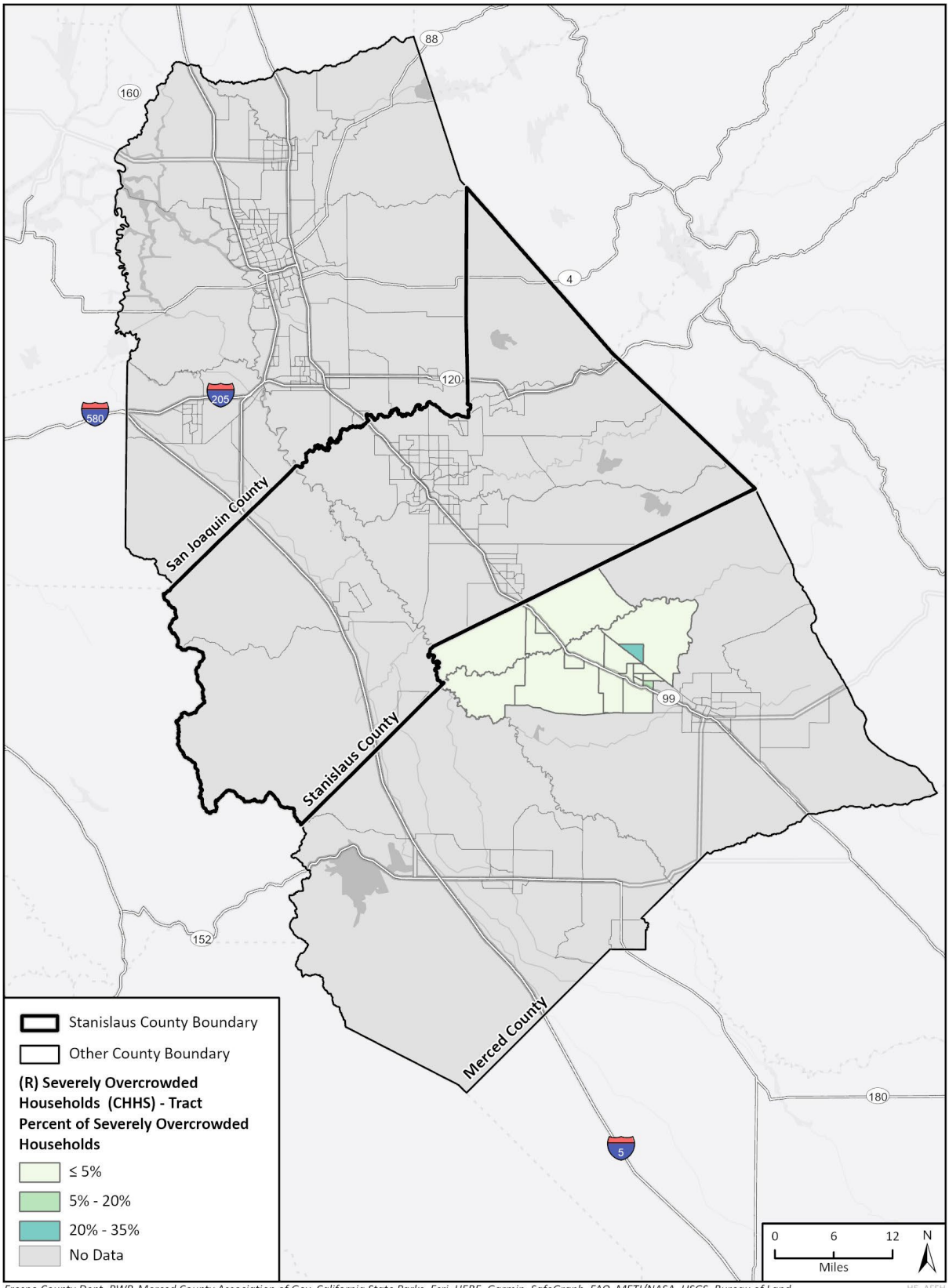

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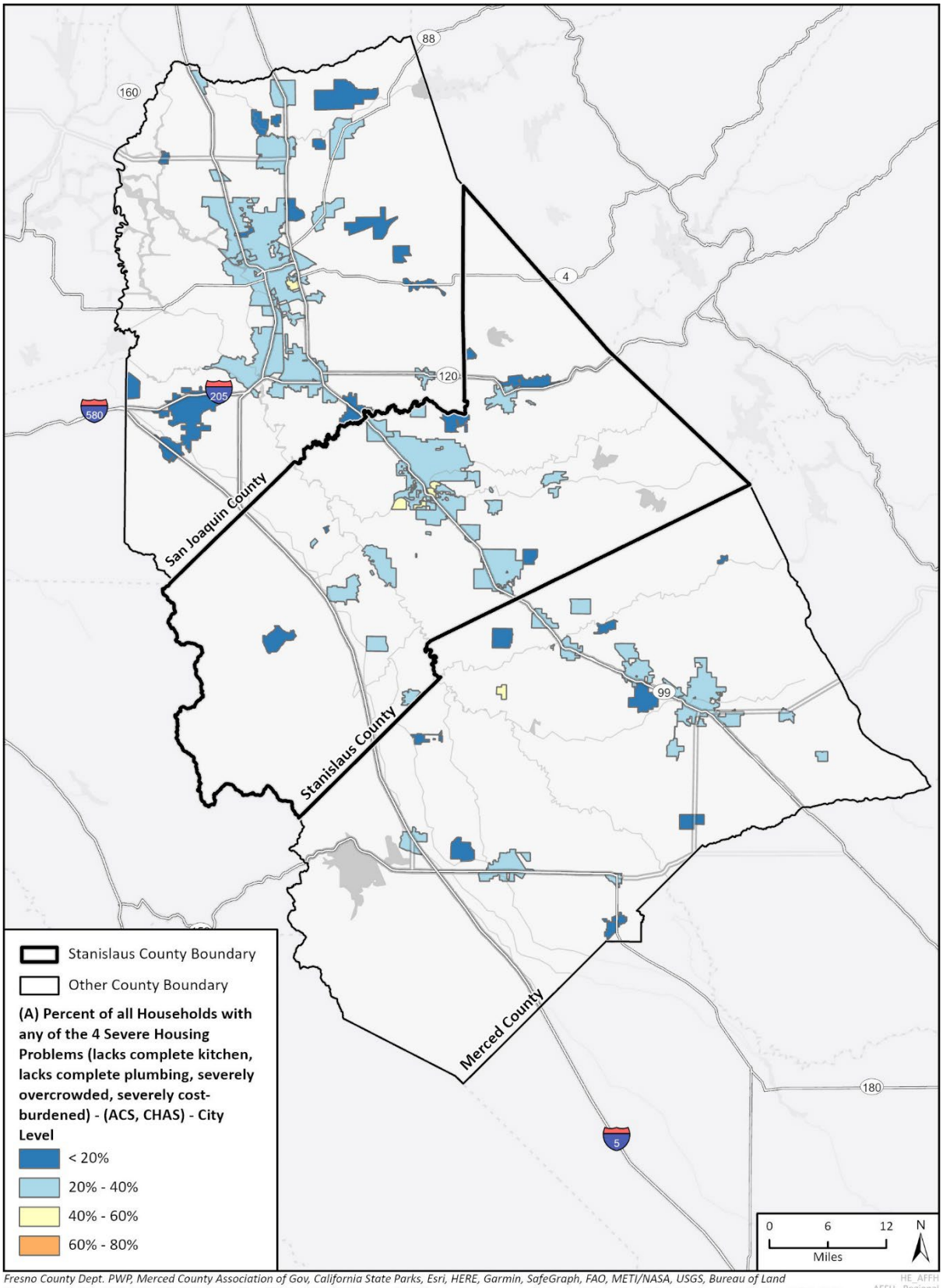
Figure 3-54 Percent of Households with Severe Housing Problems, Region



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3.12.4 Displacement

Displacement, as defined by HCD, is used to describe any involuntary household move caused by landlord action or market changes. Shifts in neighborhood composition are often framed and perpetuated by established patterns of racial inequity and segregation. The movement of people, public policies, investments (such as capital improvements and planned transit stops) and flows of private capital can lead to displacement. Displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, aging unmaintained units, and insufficient market-rate housing production. Decades of disinvestment in lower-income communities, coupled with investor speculation, can result in a rent gap or a disparity between current rental income of the land, and potentially achievable rental income if the property is converted to its most profitable use. These processes can disproportionally impact people of color, as well as lower-income households, persons with disabilities, large households, and persons at-risk of or experiencing homelessness.[19]

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

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

Local Trends

According to the UDP metrics, sensitive communities are concentrated in the central and southwestern parts of the County (Figure 3-55). Rouse/Colorado, Riverdale Park Tract, Bret Harte, Bystrom, Airport, Empire, and Crows Landing are the CDPs that are sensitive communities. These sensitive communities include populations that are vulnerable to displacement and have at least 20 percent of residents that are very low-income. As Figure 3-56 shows, most of the County has a lower displacement risk. Parts of the County with the highest risk of displacement are within or near the cities of Modesto and Turlock. Airport, Bystrom, and part of West Modesto all have one group at risk of displacement, meaning that there is either a high or elevated risk for an income group within that census tract. Within these three areas, there is an elevated risk for very low-income households. Rouse/Colorado is the only location where there are two income groups at risk of displacement: a high risk of displacement for low-income and extreme displacement risk for very low-income households. Census tracts with higher displacement risk also overlap with R/ECAPs and areas with higher poverty rates, high rates of overcrowding, and high rates of overpayment by renters.

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

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

Affordable Housing) and 5-3 (Displacement Prevention) contain actions to mitigate displacement risk by preserving existing affordable housing and connecting at-risk residents to legal services and resources.

Regional Comparison

Stanislaus County is the only County in the Northern San Joaquin Valley where one or more income groups risk displacement. Generally, most of the region has a low risk of displacement and areas at risk of displacement are seen within major cities, as seen in Figure 3-57. The areas at risk of displacement overlap with areas that experience higher rent.

Figure 3-55 Sensitive Communities, Stanislaus County

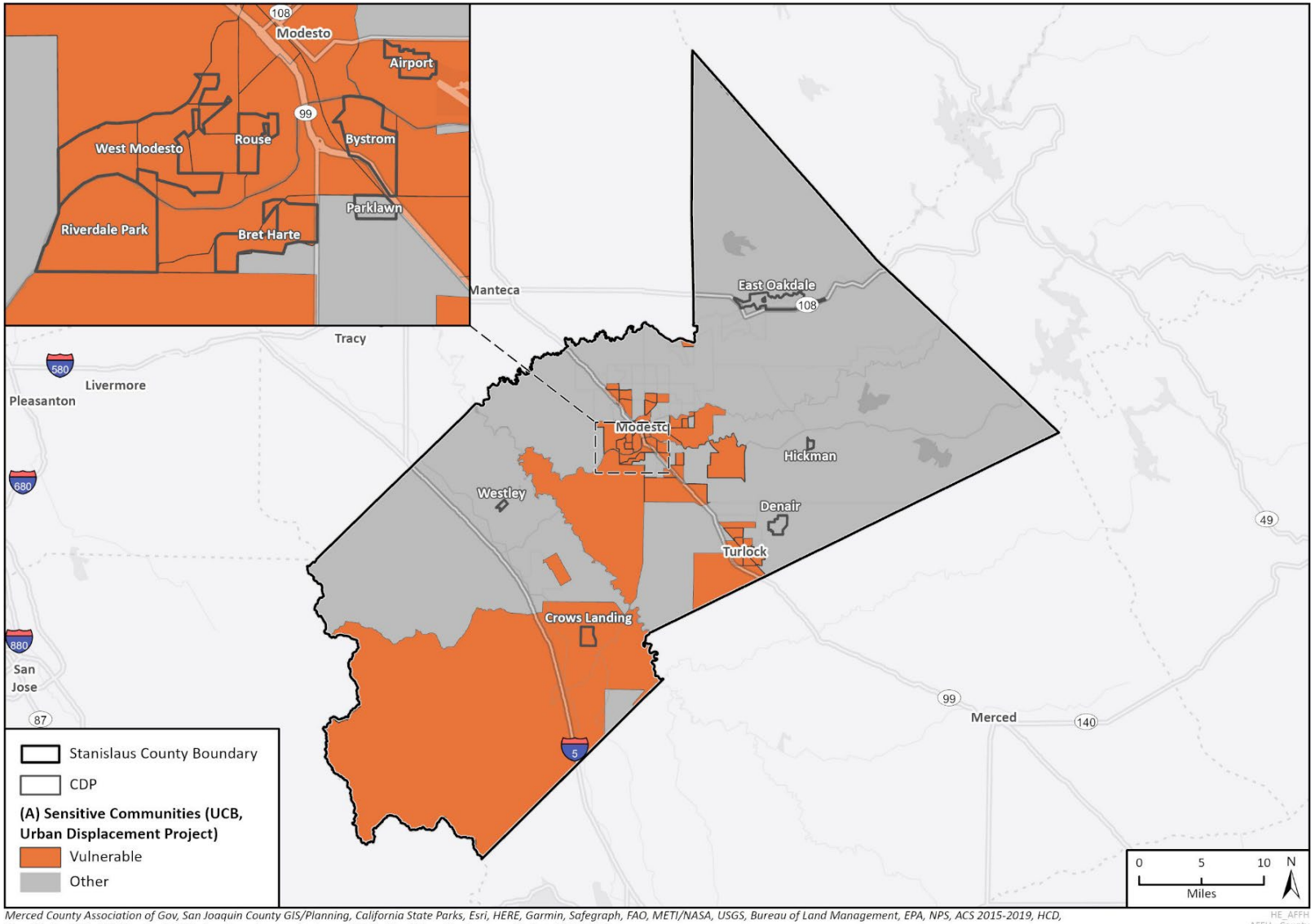
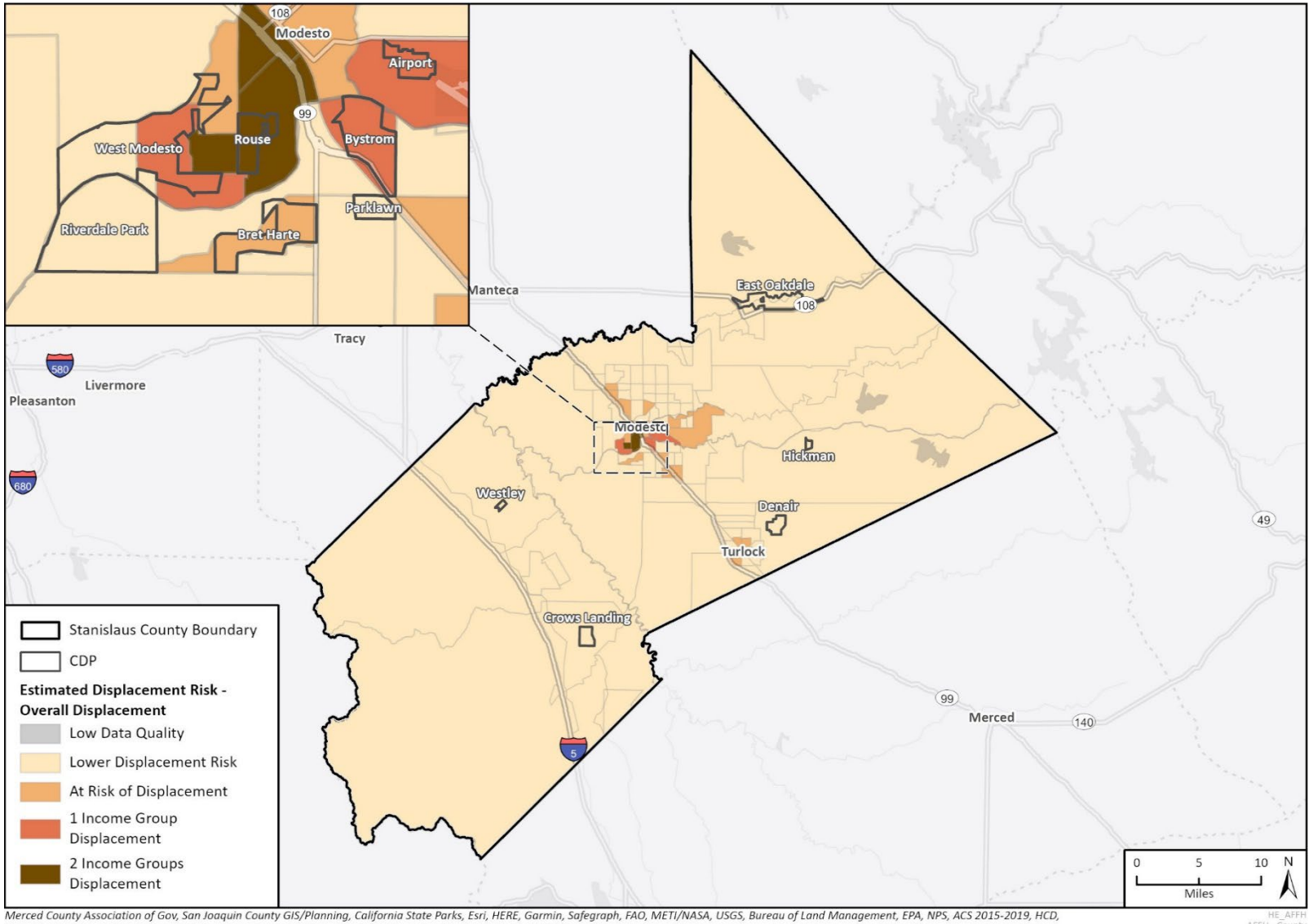


Figure 3-56 Estimated Displacement Risk, Stanislaus County



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

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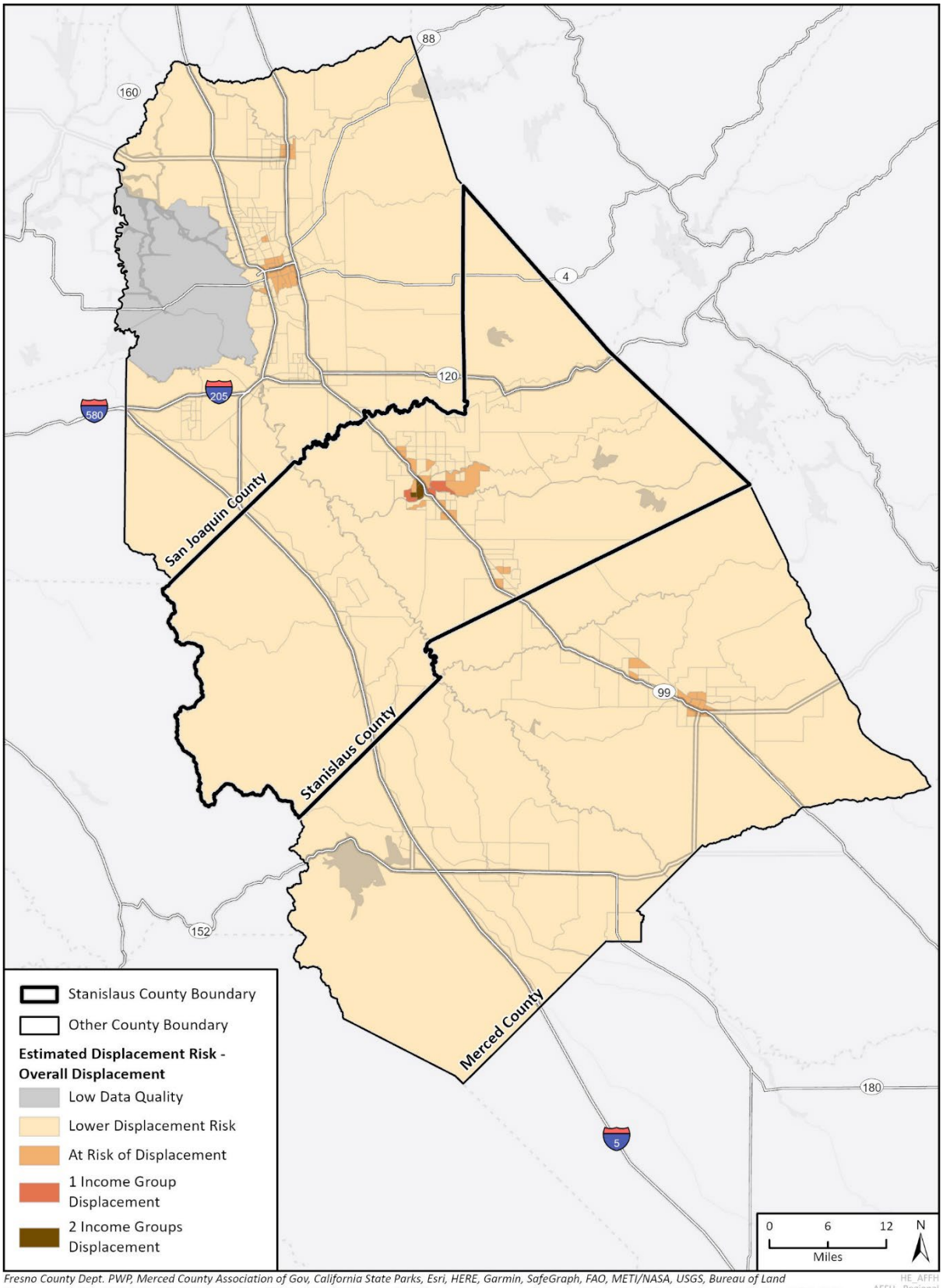
AFFH - County

Figure 3-57 Estimated Displacement Risk, Region



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

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3.12.5 Homelessness

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

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

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

Local Trends

The primary quantitative data source on shelters for homelessness and homelessness count is the Point-in-Time (PIT) count. With help of volunteers, the 2023 count was organized by the Stanislaus Community System of Care (CSOC) to track the number of people who are currently experiencing homelessness. The 2023 PIT count identified a total of 2,091 people experiencing homelessness in Stanislaus County. Of the individuals counted in Stanislaus County, 941 were unsheltered, and 1,150 individuals were sheltered. Most homeless individuals identified in the PIT Count were located in incorporated cities, including the cities of Modesto (78 percent of total homeless population) and Turlock (11 percent of total homeless population). Of the total homeless individuals counted, 79 were located in unincorporated communities, with the highest count located in Empire (76 individuals, four percent of total homeless population). Three homeless individuals were recorded in Keyes (less than one percent of the homeless population). It can be assumed that most of the County's homeless population are located in more urban areas as these areas are closer to services and resources.

Of the homeless individuals counted in 2023, approximately 23 percent identified as having a mental illness and 12 percent identified as survivors of domestic violence. As seen in Table 3-18, those counted were likely to be Hispanic, white, or Black or African American. While the 2023 PIT Count does not break down population characteristics for homeless individuals by geographic area within the County, it can be assumed that population characteristics of homeless individuals residing in the unincorporated parts of the County are similar to those of the overall homeless population. CSOC's 2021 Regional Strategic Plan to Address Homelessness identified that Black/African American individuals are disproportionately represented in the homeless population compared to the overall population of the County, while most other racial/ethnic groups were equally or underrepresented.

Table 3-18 Homelessness by Race, Stanislaus County

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

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

When it comes to housing for homeless individuals, Stanislaus County has 14 available emergency shelters, as seen in Table 3-19. Out of the emergency shelters in the County, approximately 93 percent of them have occupied beds (Figure 3-58).

Table 3-19 Emergency Shelters in Stanislaus County

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

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

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

The 2021 Regional Strategic Plan to Address Homelessness identified barriers to addressing homelessness in communities throughout the County. In unincorporated areas of the County, the biggest barriers were identified as insufficient mental health support and the high cost of housing. Community engagement associated with the Strategic Plan included a community survey to identify gaps in resources and strategies to improve services for the County's homeless population. Through this survey, community members identified the need for more/better outreach to engage homeless individuals and to spread awareness of available resources. Actions identified to address homelessness in unincorporated areas of the County included substance abuse treatment, more permanent supportive housing, and innovative housing solutions (such as shared housing or tiny homes). These barriers were similarly identified in most of the incorporated cities in the County as well. The majority of Black/African American and Trans/Non-binary/Gender Non-Conforming survey respondents also reported that they disagree with the statement that "in the Stanislaus homeless system of care, everyone is treated fairly and has equal access to homeless services and housing in the community, regardless of who they are." LGBTQ+ people experiencing homelessness throughout the County also reported experiences of discrimination and denial of services and housing.

The 2024 homeless point-in-time (PIT) count enumerated 2,052 homeless individuals, which was a decrease of 39 homeless individuals from the 2023 PIT count; 596 of the homeless individuals counted were unsheltered and 1,072 were sheltered; 26 percent of the homeless adults counted indicated they also had a mental health disorder, 16 percent indicated they had a substance abuse disorder, and 11 percent indicated that they were survivors of domestic violence. The unincorporated Stanislaus County communities included a total of 78 homeless individuals, including the communities of Denair (1), Salida (5), Crows Landing (5), and Empire (67). The County will implement Program 4-3 to address homelessness in unincorporated County, with targeted assistance in Empire. Program actions include supporting the development of emergency shelters and transitional and supportive housing programs by pursuing federal and state funding, amending development standards for emergency shelters, and coordinating with regional agencies and service providers.

Regional Comparison

In comparing the number of available beds in Stanislaus County to the other counties in the region, Stanislaus lies in the middle and is the only County that provides a seasonal emergency shelter. Regionally there are a total of 36 emergency shelters, with 17 in San Joaquin County, 14 in Stanislaus, and five in Merced County. However, these shelters are reaching capacity with 100 percent of the beds occupied in San Joaquin County, 93 percent in Stanislaus County, and 53 percent of beds occupied in Merced County (Figure 3-59). Overall, with the lack of capacity in existing emergency shelters, there is a greater need for more emergency housing located throughout the region to support the needs of homeless individuals.

Figure 3-58 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Stanislaus County

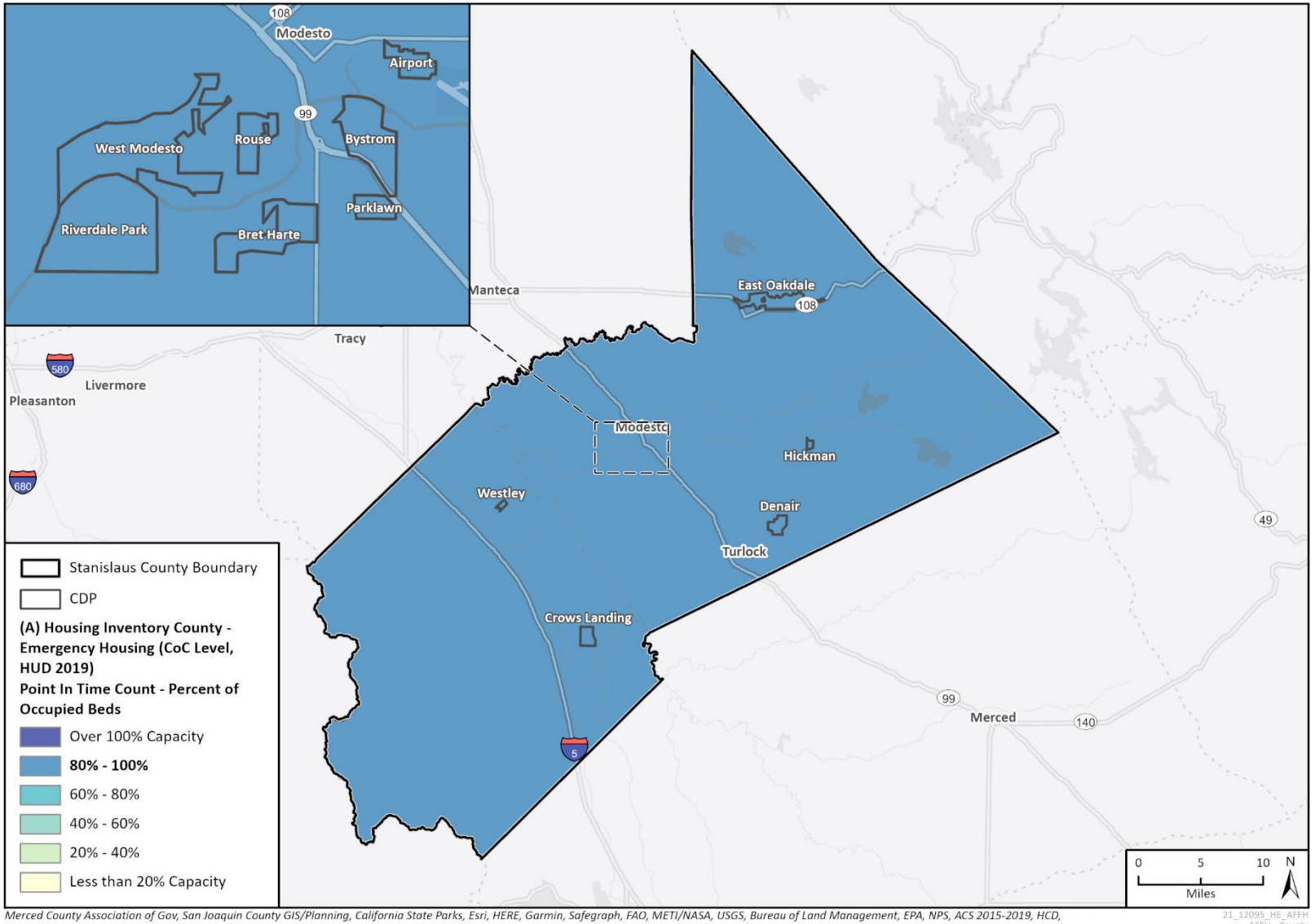
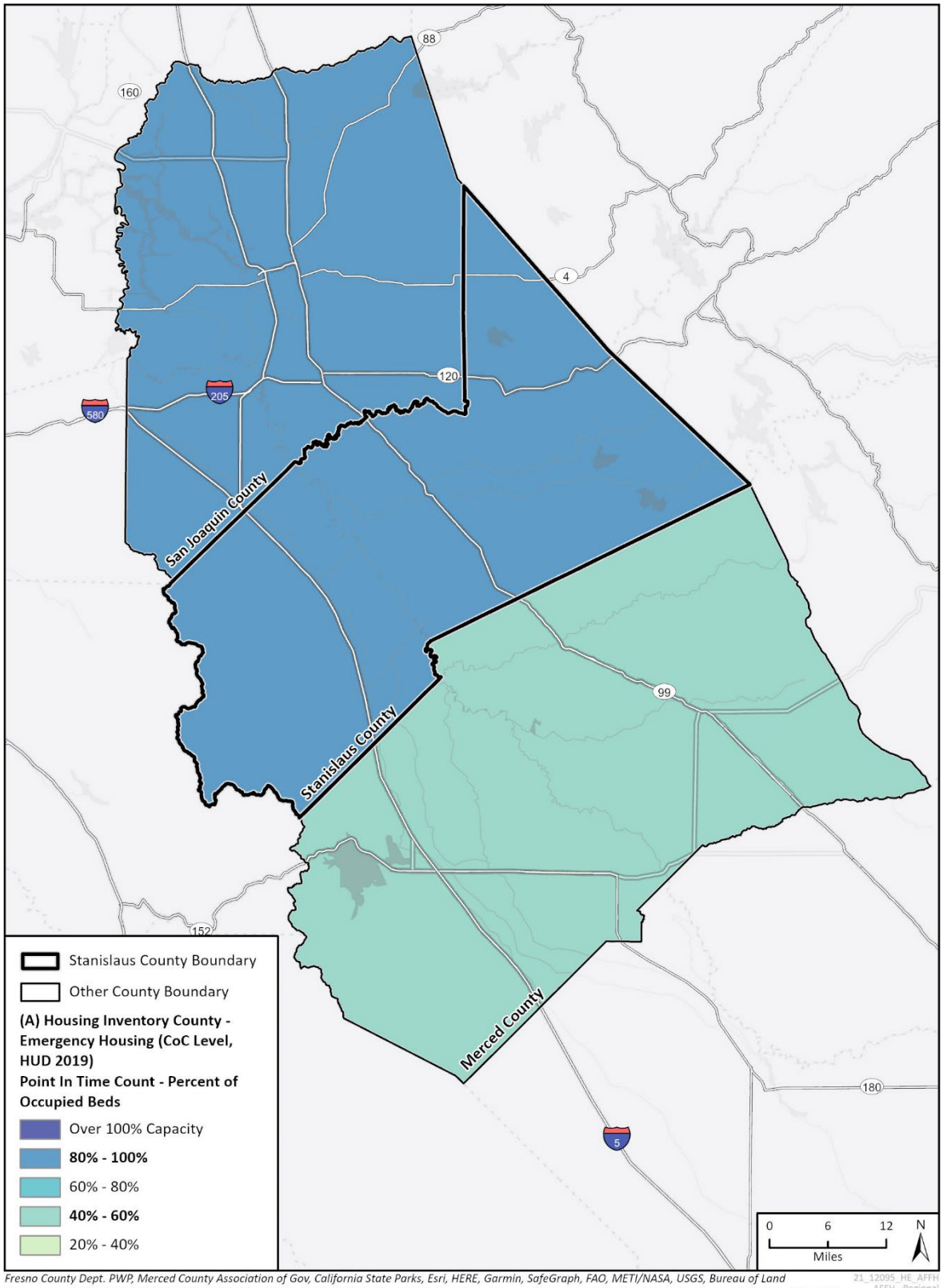


Figure 3-59 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Region



3.13 Local Knowledge

3.13.1 Historic Patterns of Segregation

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

The first inhabitants in the San Joaquin Valley were the Yokut-speaking tribes, composed of approximately 50 groups who spoke various dialects. Mexican ranchers and American settlers gained prominence in the 1800s and raised animals. After the U.S. annexed California in 1848, the federal government sold vast tracts of land to the Southern Pacific Railroad Company as well as ranching, and farming interests, ignoring and overriding the property rights of Mexican and Indigenous landholders. Many Native American tribes were forced to give up their land and live on reservations.[20] When gold was discovered in 1848, thousands of prospectors came to the San Joaquin Valley and with them, they brought diseases that quickly decimated the Native American population.[21]

Chinese and Japanese immigrants, originally brought to California by the Gold Rush and later to work on the Southern Pacific Railroad, began to work as farm laborers throughout the San Joaquin Valley. However, resentment towards Chinese and Japanese immigrants, especially by jobless white residents, led to farms recruiting Black/African Americans from the southern U.S. to replace them as farm laborers. Many Black/African Americans began by working in the fields and vineyards and eventually transitioned from farm labor to living in the cities and towns.[22]

In the 1930s, nearly half a million people migrated to Southern and Central California from across the United States during what was known as the "Dust Bowl." Many of these people moved to California in hopes of working in the agricultural industry, but were forced to take temporary and transient work, leaving them with little choice but to form makeshift camps near roadsides and ditches, without access to housing, clean water, and sanitation. These conditions, as well as lack of medical treatment and education, were exacerbated for the non-white migrant farmworkers as a result of economic and racial segregation. When World War II created a need for manufacturing labor, many of the white "Dust Bowl" workers relocated to other cities in California, such as San Francisco, Los Angeles, and San Diego, leaving a gap in farm labor.[23] Japanese, Punjabi, and Filipino people, as well as Black/African Americans from cotton regions, filled the void. Japanese residents, however, were forcibly relocated to internment camps from 1942 to 1946.[24]

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

[20] PolicyLink. Facing History, Uprooting Inequality: A Path to Housing Justice in California. https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf
[21] Tule River Indian Tribe of California. 2018. Tule River History. https://tulerivertribe-nsn.gov/history/
[22] Michael Eissinger. 2009. The Transplantation Of African Americans And Cotton Culture To California's Rural San Joaquin Valley During The Nineteenth And Twentieth Centuries. https://meissinger.com/uploads/3/4/9/1/34919185/transplantation_of_african_americans_and_cotton_culture_to_californias_rural_san_joaquin_valley.pdf
[23] Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives. https://www.csub.edu/library/_files/DB_files/OkieHealth.pdf
[24] History.com. Japanese Internment. https://www.history.com/topics/world-war-ii/japanese-american-relocation

Migrants today confront multiple social, environmental, and access issues, including affordable, safe, and sanitary housing.[25]

Increasingly after the first World War, to circumvent the US Supreme Court ban on outright racial zoning, local governments implemented other forms of exclusionary zoning that avoided direct mention of race but kept lower-income people of color out by marshalling land use regulations against them. Through residential zoning that mandates larger parcel sizes for single-family homes, typically unaffordable to people of color, wealthier households established and maintained mostly white neighborhoods throughout California. The federal government subsidized white homeownership and wealth-building and excluded people of color.[26]

Throughout the state, but particularly concentrated in inland areas, some cities have used their annexation power to reinforce patterns of racial exclusion and segregation. Since the 1960s, as cities expanded and selectively annexed land, some deliberately bypassed and grew around communities of color in unincorporated neighborhoods, the very places people of color were relegated to by restrictive covenants. This selective annexation process has left hundreds of disadvantaged unincorporated places, disproportionately of color, without the most basic elements of a healthy, safe community, such as utilities, sanitation, safe drinking water, and other critical community services. Restrictive covenants, exclusion, and racial violence pushed Black/African American and lower-income people of color to settle outside of towns. In places throughout the San Joaquin Valley and on the fringes of cities such as Fresno, Bakersfield, Stockton, Tulare, and Modesto, such communities of color were left unincorporated and without access to incorporated areas' tax revenues or infrastructure.[27] Exclusionary post-war development started moving further from city centers, and within time, these communities often created their own civic and utility districts, which redistributed investment away from cities, in a movement known as "White Flight."

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

The agricultural industry continues to play a large role in the economy and development patterns throughout the Northern San Joaquin Valley region. Small predominantly Hispanic/Latino communities, such as the Monterey Park Tract in Stanislaus County, were once home to Black/African American farmworkers, and today remain isolated from other areas of the County. Areas such as these have high rates of poverty, experience disproportionately high pollution burden and lack reliable water systems.[28] Although according to the County's Disadvantaged Unincorporated Communities Report, the County is making efforts to inventory each communities needs and install the necessary infrastructure.[29] Incorporation and annexation has continued to be an issue in the

[25] Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives. https://www.csub.edu/library/_files/DB_files/OkieHealth.pdf

[26] National Parks Service, U.S. Department of the Interior, and National Historic Landmarks Program, Civil Rights in America: Racial Discrimination in Housing, March 2021. https://www.nps.gov/subjects/nationalhistoriclandmarks/upload/Civil_Rights_Housing_NHL_Theme_Study_revisedfinal.pdfv

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

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

[29] Stanislaus County Disadvantaged Unincorporated Communities Report, November 2015. https://www.stanCounty.com/planning/pl/documents/gp/i-d-stanislaus-County-disadvantaged-unin-communities-report.pdf

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

3.13.2 Development Patterns within the Unincorporated County

After World War II, rapid growth throughout the state led to a boom in housing development, resulting in urban development expanding into unincorporated lands. This created a proliferation of local agencies with inefficient and overlapping service boundaries, and a rapid conversion/loss of California's agricultural and open-space lands. Many cities found it necessary to annex neighboring County land to accommodate additional development. The process for annexation required property owners to petition cities to be included in an annexation area. Thus, annexations were typically on vacant lands where property owner consent was more easily obtained, bypassing adjacent inhabited neighborhoods where residents may be resistant to annexation for numerous reasons and could defeat an annexation during an election. Reasons for opposition to annexation included fear of potential tax increases, a desire to preserve community identity, and other advantages they perceived for keeping their neighborhoods' unincorporated status.

Many of the unincorporated areas also had infrastructure deficiencies that would be expensive to upgrade to meet standards (e.g., no curb, gutters, sidewalks, public sewer and/or water systems, street lighting, drainage, etc.). These areas also lacked sufficient revenue-generating potential to offset the costs of upgrading or implementing these improvements. If there was strong opposition to annexation, cities often avoided pursuing inclusion of these inhabited areas against the will of the residents. As a byproduct of these land use policies, unincorporated pockets (peninsulas of unincorporated territory) and islands (areas substantially or fully surrounded by city limits) were generated as select areas of land were annexed into incorporated cities. The majority of island and pocket areas in Stanislaus County are located within the SOI of the cities of Modesto, Ceres, and Turlock. Residents living in unincorporated pockets or islands tend to receive services from a combination of service providers. In addition to on-site, private systems (e.g., well or septic), unincorporated areas may also receive services from an adjacent city, the County, and one or more special districts. This situation can create public confusion over jurisdictional boundaries and service responsibilities. Inefficiencies are inherent when two different agencies may provide the same type of service (at varying service levels) to different portions of the same neighborhood and cross each other's territory on their way to provide such service(s).

To help resolve this issue, the State Legislature created Local Agency Formation Commissions (LAFCOs) in each county to provide oversight of boundary changes and the creation or reorganization of agencies. Stanislaus County LAFCO's policies encourage the elimination of islands as well as unincorporated pockets. Similarly, LAFCO's policies encourage the efficient provision of services in unincorporated communities which may not be adjacent to or anticipated to annex to a neighboring city. State legislation requires cities and counties to identify and analyze islands, fringe and legacy communities as part of their general plans, and encourages the annexation and extension of services to disadvantaged communities. A disadvantaged community is one with an annual median income that is less than 80 percent of the statewide annual median household income, which includes the majority of unincorporated islands in Stanislaus County. Annexations for the purpose of incorporating land are actions initiated by a city and considered for approval by LAFCO, outside of the County's control.

Newly annexed properties are regulated and developed with consistent plans, policies, and standards. They can also tap into city resources and funds that can help with improvements for infrastructure and housing. However, there is little financial incentive for cities to annex these areas and often

residents and/or property owners are opposed to annexation. When annexation occurs, a city takes over service responsibilities for the annexed area and is therefore entitled to a portion of the revenues previously allocated to the county to offset the service costs. The greatest impediment to such annexations is providing municipal infrastructure (curb, gutter, sidewalks, streets, sewer, storm drain, lighting, etc.) consistent with city standards.

Over the years, Stanislaus County has undertaken various steps to address infrastructure needs within unincorporated developed neighborhoods; steps needed to both preserve and enhance existing housing and to support further housing development. With the establishment of a Redevelopment Agency (RDA) in 1991, which was later dissolved by the State in 2012, the County worked to improve areas that were developed without adequate sewer systems, storm drainage (including curbs and gutters), and sidewalks. The establishment of the RDA included a settlement agreement for the purpose of protecting against, and to compensate for, displacement of very low-, low-, and moderate-income households by public and private development activities and to expand the supply of housing available within the RDA project area for households of these income levels. Efforts to expand the supply of housing included a commitment of 25 percent of the gross tax increment (five-percent greater than State requirements) to improve and expand the supply of housing. Before the RDA's dissolution, the County utilized CDBG, CalHOME, and HOME funds to leverage RDA funding for housing development, housing rehabilitation, and homeownership opportunities; however, the ability to deliver housing projects was limited by the lack of infrastructure. Since the RDA's dissolution, the County has continued its efforts to support affordable housing efforts throughout the County (both in the incorporated and unincorporated areas).

South and West Modesto are comprised of unincorporated islands and pockets which are reflective of the patterns of annexation. Both the South and West Modesto areas are located within the City of Modesto's SOI, a designation set by LAFCO in recognition of the area's probability of annexation. As adjacent lands have developed under City jurisdiction, the disparities in infrastructure quality of roads, sidewalks, and sanitary sewer have become more apparent. Both the County and the City of Modesto recognize that the inconsistent patterns of annexation contribute to a pattern of disparities in access to services and infrastructure. The City is working with the County to improve the provision of services through placed-based efforts which are reflected in housing programs for both jurisdictions. The County and the City are also coordinating on the extension of sewer services to areas currently on septic system. The County is coordinating with the City on ARPA funded improvements to unincorporated islands and pockets within the City of Modesto's SOI. All improvements are to be designed and installed to City of Modesto standards with the goal of annexation in the future as funding becomes available to provide improvements to these communities.

3.13.3 Existing County Efforts

The County continues its work to revitalize historically disadvantaged communities and improve access to opportunities for residents throughout unincorporated parts of the County. Efforts include improving access to public infrastructure (including curbs, gutter, sidewalks, streets, sewer, storm drains, lighting, etc.).

Recent efforts to address infrastructure needs in unincorporated areas of the County include the 2020 adoption of a five-year plan for the use of State Permanent Local Housing Allocation (PLHA) funding and the 2022 approval to take over as the lead entity with the purpose of locally retaining HOME funding. In addition, Stanislaus County recently adopted master tax-sharing agreements between the County and the nine cities within the county, providing for a 50-50 tax split among the cities and the County for most annexations. Island annexations were specifically exempted from these master

agreements, providing an opportunity for individual negotiations to occur with each island that could further incentivize annexation.

The CDBG and HOME funding utilized by Stanislaus County are annual allocations of HUD Entitlement Funds. Stanislaus County has served as the lead entity for the Stanislaus Urban County for the purpose of receiving CDBG funding. The Stanislaus Urban County is currently comprised of unincorporated areas as well as the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford. Beginning in 2000, with the City of Turlock serving as the lead entity, the Stanislaus Urban County was part of the City of Turlock/Stanislaus Urban County HOME Consortium for purpose of receiving HOME funding. On July 1, 2023, Stanislaus County became the lead entity of a new HOME Consortium, the Stanislaus HOME Consortium consisting of the Stanislaus Urban County and the City of Turlock. As a partner in housing funds with eight of the County's nine cities, the County is continuously working with its partners and community stakeholders to identify affordable housing opportunities. However, the County recognizes that affordable housing is only one component of the local housing framework. The County led the 2023 Housing Stanislaus effort (housingstanislaus.org) aimed at increasing housing supply throughout Stanislaus County to meet the needs of current and future residents, regardless of age, ability, or income.

In order to meet the housing needs of the unincorporated area, the County has focused its efforts on utilizing the County's portion of CDBG funding to develop sewer systems in areas dependent on septic systems. In accordance with a 2011 settlement agreement resulting from the *Committee Concerning Community Improvement et al. v. City of Modesto, et al.*, lawsuit, the County adopted Residential Neighborhood Infrastructure Project Ranking Criteria which is used to determine the priority usage of CDBG funding; placing priority on public health and safety needs. The County has and continues to leverage State Water Board funds in the development of sewer systems in priority areas. On top of CDBG funds, the County has committed to investing $50 million of the $107 million ARPA funds the County received to make infrastructure improvements throughout the unincorporated area. The ARPA funding will be used for a mix of sewer, curb, gutter, and sidewalk improvements throughout the county, including some of the areas identified by the Sites Inventory with rezone sites.

Between 2019 and 2020, the County began development of cost estimates for public improvements covering 41 individual urban pockets (County islands), predominately around the cities of Modesto, Turlock, Ceres, and Riverbank and thirteen County communities. As of September 2022, the estimated total infrastructure cost was approximately $707 million. In May of 2021, the County allocated $50 million of American Rescue Plan Act of 2021 (ARPA) funding allocated to the County to be used for community infrastructure improvements. Funded projects respond to the need to achieve an adequate minimum level of basic infrastructure for households in undeveloped areas of the County by providing sewer. The ARPA funds have provided a unique opportunity for the County to make substantial progress strategically in the infrastructure needs of its urban pocket and County communities.

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

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

- Installation of new bus stop shelters with security lighting in the communities of Empire, Hickman, Westley, and Keyes, and within the unincorporated areas of Ceres, Patterson, and Riverbank.
- Replacement of 99 curb ramps meeting current Caltrans ADA standards in the communities of Denair, Del Rio, and Ceres.
- Installation of at-grade sidewalks and class I, III, and IV bike lanes throughout the Airport Neighborhood, improving access to alternative modes of transportation to area residents.
- Completion of Phase I of a Proposition 1 Disadvantaged Communities Involvement Grant intended to alleviate flooding in disadvantaged communities along Dry Creek and the Tuolumne River. Phase I of the project consisted of the selection of ten potential groundwater recharge project sites and development a GIS database of the Dry Creek Watershed. Phase II includes analysis of potential project sites identified in Phase I and selection of the most promising sites.
- The County has invested in improvements to the Fairview Community Park which is surrounded on three sides by proposed rezone sites.
- The Bret Harte neighborhood is in the process of receiving storm drainage (including curb and gutter), sidewalk, and improvements to its current street lighting with ARPA funds.
- The Crows Landing Road corridor is the leading sales tax generating corridor in Stanislaus County. Over the last decade the corridor has seen numerous roadway improvements and the removal of a tallow plant at the northern end of the corridor, which has greatly improved conditions that at one time made the livability in this area challenging. The corridor is currently one of two focus areas for the City of Modesto's South Modesto Planning, which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, infrastructure, and other issues for the Southwest Modesto Plan area.

3.14 Community Input

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

3.14.1 Community Workshops

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

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

- Homeless and transitional housing is the most immediate need in the County.
- Affordable senior housing is needed, very few units available.
- Zoning is a barrier. Appropriate zoning capacity is needed to meet the needs of affordable housing projects.
- There is a need for housing for youth coming out of foster care.

- Increases in rental up-front costs have been a constraint to accessing housing.
- Housing choice vouchers can be obtained but there are few available housing options.
- Proximity to transportation and resources is needed in urban areas of unincorporated County, especially near Modesto.
- Provide more incentives for developers of special needs and senior housing.

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

3.14.2 Stakeholder Interviews

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

- **Community Outreach.** Stakeholders felt that additional effort is needed to help inform and educate community members in the unincorporated areas on housing rights and housing assistance opportunities. Informational and financial resource information is scattered and hard to navigate. Stakeholders report that a central information hub would be highly valued.
- **Investment in Communities.** Stakeholders expressed that some lower income, rural communities have lacked the level of investment seen in incorporated cities and wealthier neighborhoods in the County. In some cases, communities with higher percentages of people of color have received priority for infrastructure investment or consideration for annexation. Stakeholders express a desire for attention to be given to each community, how it is developed, and if the commercial and residential uses are compatible.
- **Language Barriers.** Many households in the unincorporated areas of the County need materials translated to Spanish and online outreach in Spanish to be informed on housing issues and opportunities. Stakeholders expressed the importance of translation services in getting community members to participate.
- **Lack of Transportation Options.** Although there is bus service in the unincorporated County it is not dependable and does not have enough stops throughout communities to make it a reasonable alternative to cars. A lack of transportation options makes it difficult for people, especially seniors and people with disabilities, to get to work, school, local stores and markets, and community services.
- **Lack of Services.** Some unincorporated areas of the County lack sufficient services such as afterschool programs, grocery stores, and banks.
- **Housing Rehabilitation**. Many of the units in the unincorporated County need rehabilitation, however, older long-term homeowners often cannot afford repairs. As a result, these homeowners often do not make the repairs at all or sell the property. Stakeholders felt that owners of rental units in disrepair are not motivated to rehabilitate substandard living conditions voluntarily due to high demand for rental units. Many tenants do not report these substandard living conditions out of fear of losing their housing through eviction or retaliation.
- **Transitional/Supportive Housing and Residents Experiencing Homelessness.** Many people in the community experiencing homelessness generally live in parks, cars, or vacant lots. Many of these individuals suffer from severe mental illness and require mental health services and other social

services. Although shelters exist in the area, many are waitlisted, and shelters do not work for all individuals. Additionally, services beyond emergency shelters (i.e., transitional/supportive housing) are inequitably distributed to white residents. Some stakeholders also expressed that homeless residents are often removed from higher income areas and pushed into lower-income areas, where there is a slower response for clearing encampments.

- **Workforce Housing.** It is difficult for living wage workers to find quality, safe, and affordable units. As a result, residents are living in large, often overcrowded, households or are paying more than 30 percent of their income on housing.
- **Seniors.** Many of the senior residents of Stanislaus County are on fixed incomes and struggle to find affordable housing. Many senior affordable housing facilities currently have waitlists. As mentioned earlier, lower-income senior homeowners struggle with the costs of home repairs and maintenance.
- **Proximity to Jobs.** Many stakeholders expressed the need for affordable housing to be located near centers of employment. Due to a lack of affordable housing options, many people are being forced to relocate to afford housing, pulling them further away from their jobs, communities, and basic services.
- **Park Access.** Although there are parks in or near unincorporated communities, many stakeholders expressed that they are not always accessible due to illegal dumping, encampments, and maintenance issues such as lighting. Some stakeholders also expressed that the funds raised for parks and green space through development fees rarely materializes into park development or improvements.
- **Fair Housing Issues.** Stakeholders described cases of discrimination in housing towards undocumented persons, persons with disabilities, non-native English speakers, large households, and those with past experiences in the criminal justice system. Discrimination is usually in the form of not renting units to people who will need reasonable accommodation for a disability, charging higher rent for undocumented tenants, retaliating against or evicting tenants if complaints are made about substandard conditions, and turning away applicants outright based on a false assumption that lower-income residents are more prone to illicit or illegal activity.
- **Mobile Home Parks.** Mobile homes are typically a last resort before homelessness for many lower-income residents. Some stakeholders commented that mobile home parks are coming into corporate ownership, and that these companies increase prices and displacement pressures on existing residents. Additionally, there are often titling issues with the mobile homes that allow park ownership to purchase the mobile home of a displaced resident at minimal cost, simply to resell it at a high price. Individuals residing in mobile home parks currently have few protections and need support and assistance (i.e., rent stabilization) to prevent homelessness.
- **Community Education and Outreach.** Many stakeholders felt there was an opportunity for there to be greater collaboration between the County and nonprofit organizations to provide better community education resources about homeowner/tenant's rights, housing assistance, and community services. Many organizations have already compiled this information; however, it is difficult for people to know where to go for information about services and is rarely provided in multiple languages (Spanish, Hmong, Arabic). Some stakeholders also expressed that it would be beneficial to have a one stop shop to connect people to agencies and programs.
- **Antidisplacement Efforts.** Some stakeholders mentioned occurrences of residential areas being redeveloped into commercial uses without replacing the residential units elsewhere, leading to the displacement of existing residents and a reduction in the County's housing stock. There is an

opportunity for the County to implement a program/policy that conversion to nonresidential uses or mitigates the impact on communities.

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

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

3.14.3 General Plan and Housing Element Update Survey

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

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

- **Housing Needs:** The highest priority housing need identified by respondents was lower-cost housing for all, including both rental and for-sale housing units. Respondents identified affordability of housing as the most urgent housing issue in the County by a significant margin, followed by the availability of housing, and homelessness.
- **Desired Housing Types:** Respondents identified co-housing (housing with an emphasis on community living, e.g., shared open spaces, or kitchens) as the most likely housing type to be successful in unincorporated Stanislaus County, followed by larger, custom homes and single-room occupancy housing units (small apartment that may have a common kitchen).

- **Desired Housing Location:** Respondents identified areas near public transit stops, employment, and shopping centers as the most suitable for new housing development.
- **Housing Services:** The highest priority needs for housing services were down payment assistance for lower-income, first-time homebuyers, and home repair assistance for lower-income homeowners. The highest priority needs for fair housing services include landlord/tenant counseling and education/information on tenant rights.
- **Housing Quality:** The most common housing quality issue among respondents was lack of energy efficiency and housing structural or maintenance issues.
- **Homelessness:** Many respondents identified concern regarding the prevalence of homelessness and associated issues with crime, noise, and sanitation. In addition, respondents identified a need for housing and services for persons experiencing homelessness.

The following issues were also identified by respondents:

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

3.14.4 Additional Outreach

The County conducted additional outreach efforts in April and May 2025 to expand community understanding of the updated Consolidated Plan, Housing Element Update, and sites proposed for rezoning in the Sites Inventory. The County attended a series of public meetings, and partnered with CRLA on meetings held in Rouse/Colorado and Parklawn, targeting various neighborhoods throughout the unincorporated County; the meetings included two meetings for South Modesto residents including the South Modesto Businesses United group, representing Crows Landing Road and the Bystrum corridors of South Modesto, and a Parklawn United Neighbors meeting, representing the Parklawn neighborhood; a farmers market held in the Airport neighborhood (which is a R/ECAP area); two meetings in West Modesto residents, including a West Modesto Collaborative meeting and meeting organized by CRLA in the Rouse/Colorado neighborhood; Westside neighborhoods (Grayson, Westley, and Crows Landing). County staff also presented on implementation of the Housing Element and on the proposed rezones in June and early July 2025 to the Salida Municipal Advisory Council (MAC), Empire MAC, and South Modesto MAC who all voted unanimously to support the proposed rezones. Staff will present on implementation of the housing element and proposed rezones to the Denair MAC on August 5th and the Keyes MAC on July 31st.

Through these meetings, the County identified the following themes related to the Housing Element and proposed rezoning:

Crows Landing Road:

- Need for road improvements along Crows Landing Road and Hatch 99
- Interest in regulatory concessions to incentive housing development for property owners

Airport Neighborhood:

- Need for rental assistance, homeless housing assistance, home repair assistance, and tenant/landlord counseling programs
- Need to address discriminatory practices that are incorporated into the eviction process

- Need for street lighting, road improvements, addressing loose dogs, and more grocery stores in the Airport Neighborhood

Westside of County (Grayson, Westley, Crows Landing):

- Limited options for affordable housing and programs for younger residents with disabilities
- Lack of affordability and availability of public services and resources, including water/sewer hookups and electrical services

Parklawn Neighborhood:

- Need financial assistance programs for home rehabilitation, new home construction, and development of accessory dwelling units
- Inquiries regarding zoning regulations/standards for accessory dwelling units
- Inquiry regarding implementation of water testing
- Landlords are resistant to implement improvements/repairs for rental units
- Rental costs are too high and rents are often raised significantly without warning
- Rouse/Colorado Neighborhood: General questions and concerns regarding the installation of sewer in the Rouse/Colorado neighborhood and whether the improvements would lead to traffic, noise, dust impacts during construction, increased property taxes or bills, or annexation.
- Need for insurance consultation for homeowners who are dropped from their policies
- Inquiries regarding the Site Inventory and anticipated income-categories for units on opportunity sites
- Need for stronger Code Enforcement policies/improved inspections to ensure rental units are maintained properly and safe to live in
- Concerns regarding rent stabilization policies and high costs associated with improvements of rental units
- Need more parks/recreational areas to serve the community

South Modesto Neighborhood:

- Inquiries regarding the development and funding assistance for accessory dwelling units

West Modesto Neighborhood:

- Concerns regarding homeless individuals, trash fires, and illegal dumping
- Inquiries regarding the installation of sidewalks, which has been limited to nicer areas of the neighborhood
- Need for more bus stops
- Need education on behavioral health beds and services
- Need job training assistance programs
- Inquiries regarding what parcels are proposed for rezoning
- Rental costs are too high
- Landlords are resistant to implement repairs and retaliate when tenants report issues
- Environmental justice concerns related to pesticide exposure

Programs and Actions addressing these comments have been incorporated into Chapter 6, *Housing Plan*, including: Program 1-1 which focuses on rehab assistance, Program 1-2 which includes an Action that enforces the inspection of complaints about habitability issues in rental units, Program 2-3 which aims to increase access to Housing Choice Vouchers, and Program 2-4 which supports homeownership opportunities, which all include targeted outreach to the R/ECAP communities of Airport, Bret Harte, and Rouse/Colorado; Program 3-8 which promotes the development of accessory dwelling units (ADUs), including Actions 3-8b and 3-8g which incentivize and offer funding for the production of ADUs, with focused outreach in RCAAs; Program 3-9 which invests in infrastructure improvements in existing neighborhoods, with a focus on Low Resource and R/ECAP areas; Program 4-3 which supports homeless housing; Program 5-1 which includes actions aimed at increasing economic development to aid in housing mobility, with a focus on R/ECAP and Low Resource communities, and non-motorized transportation access in R/ECAP areas; Program 5-2 which includes multiple actions aimed at providing fair housing education, including the availability of rental and utility assistance programs, fair housing investigation services, and tenant landlord counseling; and Program 5-3 which includes actions that will prevent displacement, improve existing communities through parks and roads improvement projects in communities with high displacement risk, including the R/ECAP areas of Bret Harte and Rouse/Colorado.

3.15 Other Relevant Factors

Other relevant factors that have not been previously discussed relating to fair housing include language barriers, access to homeownership, lack of services and infrastructure in rural, lower-income communities, and the availability and access to housing choice vouchers in Stanislaus County.

3.15.1 Language Barriers

According to ACS estimates, 46 percent of the population of Stanislaus County over the age of five speak a language other than English at home and 18 percent speak English less than “very well.” Approximately 36 percent of residents speak Spanish at home (37 percent of whom speak English less than very well), five percent speak other Indo-European languages at home (33 percent of whom speak English less than very well), three percent speak Asian/Pacific Island languages at home (67 percent of whom speak English less than very well), and three percent speak another language at home (42 percent of whom speak English less than very well).

As identified during public feedback, many migrant farmworkers speak a language other than English (many of whom speak Spanish) and report that they do not speak or read English well. Migrant farmworkers are not necessarily accounted for in ACS estimates, indicating that a larger percentage of the County’s population may speak English less than “very well” compared to the reported census data. Information on housing programs and resources are primarily available in English which limits accessibility for migrant farmworkers who do not speak or read English well. Where the County does provide housing services, materials are translated in accordance with federal and State funding requirements and the County's website has a “translate” option for all of its static information.

3.15.2 Access to Homeownership

To analyze access to homeownership, the 2018 Home Mortgage Disclosure Act (HMDA) is assessed to determinate the outcome of loans through demographics. As analyzed in Chapter 4, Housing Constraints, about 16,000 loans originated in Stanislaus County, with nearly 11 percent of them from

unincorporated County. Out of the areas assessed, unincorporated County cumulatively saw the lowest approval rate of 54.4 percent. In assessing loan applicants by income in Stanislaus County, most individuals fell into the upper income bracket with very few lower-income applicants. The HDMA also assess loan outcomes by race, in which Stanislaus County's Black/African American, American Indian/Alaska Native, and Hispanic/Latino residents were underrepresented in the number of applications filed. Denial rates were also higher for those racial and ethnic groups. Overall, the data analyzed in Chapter 4, *Housing Constraints*, determines that there is a degree of correlation between race, ethnicity, and income on lending outcomes, and that discrepancies exist in Stanislaus County.

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

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

The County's Disadvantaged Unincorporated Communities Report also identified a lack of infrastructure and public services in certain unincorporated communities. The DUCs discussed in the report generally lacked street improvements (curbs, gutters, sidewalks), older or insufficient utility infrastructure in need of repair or updates, limited transit access, and limited police and fire protection services. These communities consist of mainly lower-income households and do not have the funds to implement infrastructure improvements.

In August of 2011, the County Board of Supervisors (the Board) took several actions to guide infrastructure improvements and to support annexation of unincorporated pocket areas to various cities in the County. Those actions included approval of the Residential Neighborhood Infrastructure Project Ranking Criteria; adoption of a resolution supporting the annexation of unincorporated County residential pockets and islands within adopted city spheres of influence; and authorizing the negotiation and execution of an amendment of the Master Property Tax Agreement eliminating exceptions to the Agreement for the "North Airport area", "Robertson Road area", and "South Modesto area".

For residential neighborhood infrastructure projects funded with redevelopment and block grant funding, the Board action placed priority on funding those projects with public health and safety needs, which included a priority of the installation of sewer mainlines, and potable water systems. On March 28, 2017, the Board approved prioritizing the use of Community Development Block Grant (CDBG) funds allocated to unincorporated Stanislaus County to lower-income areas for sewer infrastructure projects. Prioritization was based on a sewer project prioritization study developed by Public Works, in conjunction with the departments of Environmental Resources and Planning and Community Development. The prioritization study identified three sub-areas of West Modesto (Spencer/Marshall, Rouse/Colorado, and Beverly/Waverly) as the neighborhoods most in need of

sewer improvements. Since March 2017, the West Modesto Sewer Infrastructure Project, comprised of the three sub-area neighborhoods, has been the focus of the County's use of CDBG funding.

In 2019, Stanislaus County began to develop cost estimates for public improvements consistent with city standards. The County also prepared an expanded analysis of key criteria to prioritize urban pockets and islands for annexation, analyzing 41 individual urban pocket areas (referred to as County Pockets/Islands), predominantly around the cities of Modesto, Turlock, Ceres, and Riverbank. Since then, one area has fully annexed (area 14 – Hatch/ Carpenter/ Whitmore) and one area has been partially annexed (area 11 – Whitmore/ Flamingo). The study evaluated criteria such as cost of improvements; right-of-way feasibility constraints; public benefit; supplemental funding sources; benefits to disadvantaged communities; regional equity; sewer only improvements or full improvements; and community support for maintenance of certain improvements in its ranking.

In 2020, development of a supplemental analysis began for the thirteen County Communities – Cowan Tract, Crows Landing, Del Rio, Denair, East Oakdale, Grayson, Hickman, Keyes, Knights Ferry, Monterrey Park Tract, Salida, Valley Home, and Westley. A preliminary analysis revealed infrastructure needs of the County Pockets/Islands and County Communities at an estimated cost of $395 million and $141 million respectively, for a total estimated cost of $536 million. The estimates have since been adjusted to $576 million and $131 million, for a total estimated cost of $707 million, to reflect increased inflation.

On May 18, 2021, the Board approved various strategic priorities for the use of $90 million of the $107 million in American Rescue Plan Act of 2021 (ARPA) funding allocated to Stanislaus County. Of this amount, $50 million was assigned to community infrastructure in unincorporated pockets and islands or County communities. On September 20, 2022, the Board approved the final recommendations on infrastructure projects to utilize ARPA funding in the following areas[30]:

- District 1 – Riverbank - Topeka/Santa Fe – Awarded $5,600,000 (37 parcels totaling 23 acres). Proposed to fund curb, gutter, sidewalk, street lighting, storm drainage, sewer, and water meter and lateral improvements.
- District 2 – Turlock – Kenwood/Starr – Awarded $4,700,000 (52 parcels totaling 16 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements.
- District 3 – Modesto - Riverdale Park Tract –Awarded $10,600,000 (206 parcels totaling 52 acres). Proposed to fund curb, gutter, sidewalk, storm drainage, and sewer improvements. However, due to limited funding which of these improvements and where is pending further direction. City of Modesto has plans to upgrade the water system.
- District 4 – Modesto – Rouse/Colorado – Awarded $10,000,000 (382 parcels totaling 154 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements. However, due to limited funding which of these improvements and where is pending further direction. The Planning and Community Development Department has CDBG funds and Public Works is pursuing a State Water Board Grant to fund construction of sewer mainlines, laterals, and on-site connections in this area.
- District 4 - Ceres – Herndon – Awarded $2,200,000 (362 parcels totaling 259 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements. However, due to limited funding which of these improvements and where is pending further direction.

[30] Stanislaus County. 2022. https://www.stancounty.com/bos/agenda/2022/20220920/DIS01.pdf

- District 5 – Modesto – Bret Harte – Awarded $10,000,000 (1200 parcels totaling 351 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements in the northeastern area of the neighborhood. The City of Modesto is partnering with County Public Works Department to include upgrading of the water system.
- District 5 - Modesto - Parklawn – Awarded $6,900,000 (330 parcels totaling 90 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements. The City of Modesto is partnering with County Public Works Department to include upgrading of the water system.

3.15.4 Prevalence of Low Resource Areas

Large portions of Stanislaus County consist of Low Resource areas, particularly in southwestern parts of the County, south of the City of Patterson, and areas in and surrounding the cities of Modesto, Turlock, and Ceres. In addition, the County's population is concentrated along the major highways (Interstate 5 and Highway 99) which are also surrounded by Low Resource areas. Modesto, Turlock, and Ceres are the three largest cities in the County by population and as such have well established public infrastructure and public services. These cities are also located along Highway 99 which allows for the transfer of goods and people throughout the County and region.

Many unincorporated communities are located in Low Resource areas near the cities of Modesto, Turlock, Ceres, and Patterson. While categorized as Low Resource due to high pollution burden and low economic outcome scores, these areas also have access to infrastructure, services, and employment opportunities and typically have higher access to transit with bus stops and shuttle service that connect unincorporated communities to more urban areas. Lower-income housing in unincorporated parts of the County is concentrated in these Low Resource areas because they have access to existing infrastructure, services, and transit. Proximity to established infrastructure and services lowers costs associated with development and in-turn lowers housing costs for residents, since the development can connect to existing water, sewer, electricity, internet, and circulation systems rather than establishing private systems.

3.15.5 Measure E and Measure X

Measure E, approved by Stanislaus County voters in 2007, is a local initiative that established a 30-year land use restriction that requires that any redesignation or rezoning of land in the unincorporated area from agricultural or open space use to residential use must be approved by a majority vote of the County voters at a general or special local election. While Measure E allows exceptions for lower-income housing under some circumstances and farmworker housing, only 10 acres of land per year for moderate and above moderate housing may be redesignated without a Measure E vote. Measure E also requires findings to allow exempt rezoning, including finding that there are no other sites available to meet the County's housing need. As discussed in Chapter 4, *Housing Constraints*, Measure E could be a constraint to housing as it provides additional barriers to housing development that can contribute to limited supply and thereby increase the cost of housing. However, Measure E has not been a constraint to development previously and it does include provisions that exempt the public vote requirement if the County's RHNA needs for lower-income households cannot be met. The Housing Element recognizes this as an option if the land identified for rezone fails. The County has conducted a review of Measure E and has identified infrastructure opportunities to support residential development on Measure E impacted lands within the City of Modesto's SOI and within the existing community plan areas of Denair and Keyes. In addition, the County will implement Program 3-2, which includes regular review of Measure E to evaluate its impact

on the County's ability to meet its housing needs. As part of this program, the County will develop a list of Measure E lands that could be utilized to meet housing needs.

Measure X, a local initiative approved by the voters of Stanislaus County in 1990, requires that urban development on residential parcels created after July 13, 1990, establishes primary and secondary sewage treatment. Measure X creates a stricter requirement for wastewater treatment than the California Building Code. While these requirements were deemed necessary to protect the health and well-being of residents in the unincorporated part of the County, they also increase costs associated with housing development. Additional costs are generally passed on to homeowners and renters of market rate housing, which can exacerbate cost burden. For affordable housing projects, additional costs associated with Measure X requirements can be an impediment, as they are adding to the financial challenge of development.

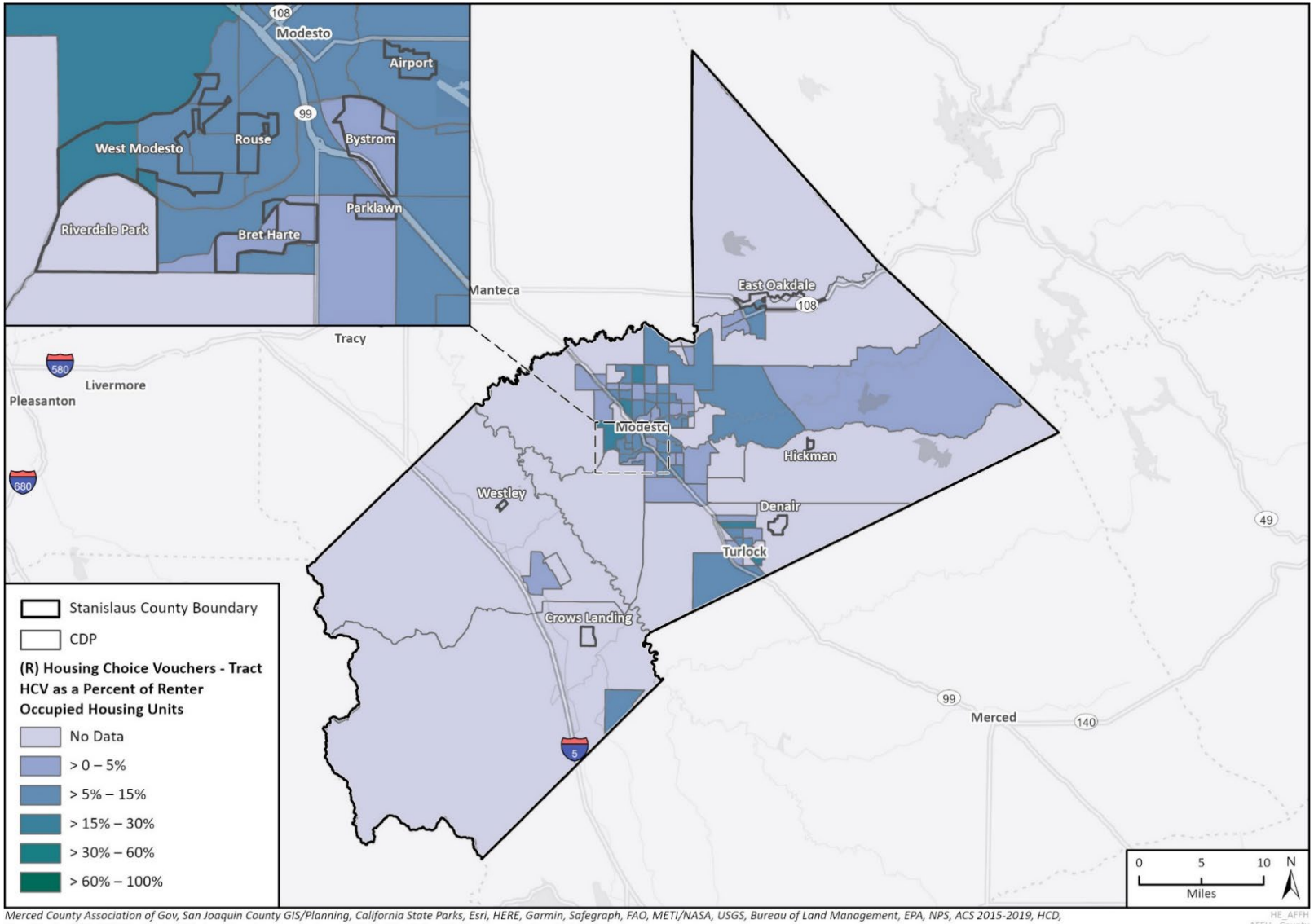
Both Measure E and Measure X create additional requirements that could be barriers for housing development and result in additional costs to develop housing. These additional costs and requirements not only discourage new housing development but also can result in increased housing costs for residents which can increase the rate of housing problems such as cost burden and overcrowding.

3.15.6 Housing Choice Vouchers

The Housing Authority within the County provides Housing Choice Vouchers (HCV) to residents and will continue to seek opportunities to increase rental assistance and reduce overpayment. Providing for economic development and small business assistance HUD estimates show that approximately 4,000 households received HCVs in Stanislaus County. As shown in Figure 3-60, the census tracts shown in Stanislaus County range from zero to 30 percent of renter-occupied units using HCVs. The area with the highest percentage of households using HCVs is West Modesto.

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

Figure 3-60 Housing Choice Vouchers, Stanislaus County



3.16 Sites Inventory

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

The Sites Inventory includes parcels within 16 CDPs in the County. In total, the Sites Inventory yielded 2,409 units—1,104 lower-income units, 550 moderate-income units, and 755 above moderate-income units.

3.16.1 Opportunity Areas

HCD/TCAC opportunity maps identify areas throughout the state that support positive economic (low poverty, high employment, high median household income), education (reading and math proficiency, high school graduation rates, low student poverty rates), and environmental outcomes (low exposure to pollution). The HCD/TCAC opportunity areas map rank census tracts from Highest Resource to Low Resource based on these characteristics. A census tract with a designation of High Resource indicates that the census tract has strong educational and economic opportunities for current and future residents.

Locally, in the unincorporated areas of Stanislaus County, areas of High Segregation and Poverty and Low Resource areas (concentrated in southwestern and central part of the county) overlap with areas that are predominantly Hispanic/Latino, and areas with lower median household incomes and some of the highest poverty rates in the county. Moderate Resource areas are located in the southwestern CDPs of Westley and Grayson, and half of Salida. High Resource areas can be found in the northern part of Salida and Keyes, and the western and southwestern portions of Denair. Areas with the highest resources are scattered throughout the county but are found in the northwestern CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, as well as Hickman.

Figure 3-61 through Figure 3-74 show the housing opportunity sites in each CDP by TCAC-designated resource area. The housing opportunity sites are designated by income category—whether the sites could accommodate housing appropriate for low-, moderate-, or above moderate-income households. The “appropriateness” of sites for various affordability levels is dictated by state housing element law and HCD guidance and includes site characteristics such as the size and allowable density of a site, its realistic capacity, availability of sewer and water service, and existing use(s). More information about the sites and income designations is available in Chapter 5, *Housing Resources*.

The locations of housing opportunity sites for each income category were chosen to facilitate the development of mixed-income neighborhoods and to increase the availability of affordable housing in proximity to transit, retail, and other services. However, many of the housing opportunity sites are in Low Resource areas and areas of High Segregation and Poverty (66 percent of the proposed housing units), due to the availability of vacant and underutilized parcels in these areas. While the majority of low- and very low-income units projected in the Sites Inventory are in Low Resource tracts, these tracts have higher access to goods and services, due to their proximity to urban services in the City of Modesto. As shown in Table 3-20, approximately 44 percent of anticipated units are located in South Modesto CDPs. Units were identified in these areas as a result of a Sites Inventory analysis and supporting development trends that concluded that this area has the highest likelihood of residential development for all income categories, specifically lower-income units.

Table 3-20 Sites Inventory by Census Tract Characteristics

			Sites Inventory Capacity + RHNA Credit Projects (Units)			AFFH Indicators						
Neighborhood/CDP	Number of Existing Households	Census Tract Number	Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile	Median Income
Airport	486	6099002100	0	15	7	75	High Segregation & Poverty	58.4	21.8	1 Income Group Displacement	93.8	$28,924
Crater Avenue Neighborhood		6099002301	0	0	9	89	Low Resource	62.9	22.9	Lower Displacement Risk	90.0	61,917
Bret Harte	1,259	6099002402	481	87	19	89	Low Resource	66.8	15.7	At Risk of Displacement	79.6	34,617
Parklawn	236	6099002501	0	14	3	87	Low Resource	55.2	6.6	Lower Displacement Risk	92.9	38,346
Crows Landing	121	6099003400	0	0	5	74	Low Resource	24.7	7.7	Lower Displacement Risk	90.4	50,125
Del Rio	490	6099000501	0	0	131	29	High Resource	26.5	1.6	Lower Displacement Risk	95.1	95,036
Denair	1,580	6099003604	127	39	68	44	High Resource	51.5	3.5	Lower Displacement Risk	69.8	106,726
Diablo Grande	361	6099003300	0	0	112	73	Moderate Resource	35.9	10.7	Lower Displacement Risk	96.5	81,895
Empire	1,343	6099002002	17	46	43	61	Low Resource	38.7	4.2	At Risk of Displacement	89.3	47,967
Grayson	276	6099003300	0	0	6	87	Moderate Resource	35.9	10.7	Lower Displacement Risk	96.5	81,895
Hickman	211	6099002901	0	0	19	43	Highest Resource	17.7	3.1	Lower Displacement Risk	75.1	79,474
Keyes	1,704	6099003002	58	38	18	75	High Resource	40.0	7.7	Lower Displacement Risk	78.7	56,579
Bystrom	1,085	6099002302	77	55	19	84	High Segregation & Poverty	72.6	22.7	1 Income Group Displacement	88.5	36,102
North Ceres (Encompasses Ceres-River Road neighborhood)		6099002701	0	0	5	57	Moderate Resource	49.7	0.3	Lower Displacement Risk	44.2	77,269
North Ceres (Encompasses Ceres-Herndon and Hatch/Stonum neighborhoods)		6099002702	20	2	2	80	Low Resource	53.9	15.9	Lower Displacement Risk	72.9	55,607
East Oakdale	1,122	6099000101	0	0	11	17	Highest Resource	27.9	2.2	Lower Displacement Risk	72.3	87,692
		6099000102	0	0	104	26	Highest Resource	26.0	1.6	Lower Displacement Risk	90.8	104,010
		6099000203	0	0	46	29	Moderate Resource	57.9	8.5	Lower Displacement Risk	87.0	64,375
Salida	4,078	6099000501	0	18	3	33	High Resource	26.5	1.6	Lower Displacement Risk	77.8	95,036
		6099000510	0	5	2	73	Moderate Resource	54.3	4.4	Lower Displacement Risk	77.8	62,253
South Ceres (Encompasses Laurel Central neighborhood)		6099002503	76	8	9	68	Low Resource	49.8	10.0	At Risk of Displacement	77.5	49,810
Turlock (Kenwood/Star neighborhood)		6099003906	0	7	3	64	Low Resource	60.2	4.6	At Risk of Displacement	47.1	34,500
Valley Home	81	6099000101	0	0	4	33	Highest Resource	27.9	2.2	Lower Displacement Risk	72.3	87,692
West Modesto (Encompasses Elm/Emerald and Beverly/Waverly neighborhoods)	1,559	6099001500	0	31	9	68	Low Resource	52.5	12.2	Lower Displacement Risk	92.9	71,290
West Modesto (Encompasses California/Briggs, Spencer/Marshall neighborhoods)		6099001601	248	102	17	87	High Segregation & Poverty	63.7	19.7	At Risk of Displacement	61.5	48,563

Neighborhood/CDP	Number of Existing Households	Census Tract Number	Sites Inventory Capacity + RHNA Credit Projects (Units)			AFFH Indicators						
			Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile	Median Income
West Modesto (Encompasses Beverly/Waverly, Vernon, and Robertson Road neighborhoods)		6099001603	0	6	18	84	Low Resource	66.7	18.8	1 Income Group Displacement	67.7	55,461
Rouse (Encompasses Rouse/Colorado neighborhood)	507	6099002200	0	77	63	87	Low Resource	61.9	22.7	2 Income Groups Displacement	84.9	44,010
Total			**1,104**	**550**	**755**							

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

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

Table reflects census tract boundaries from 2010 Census.

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

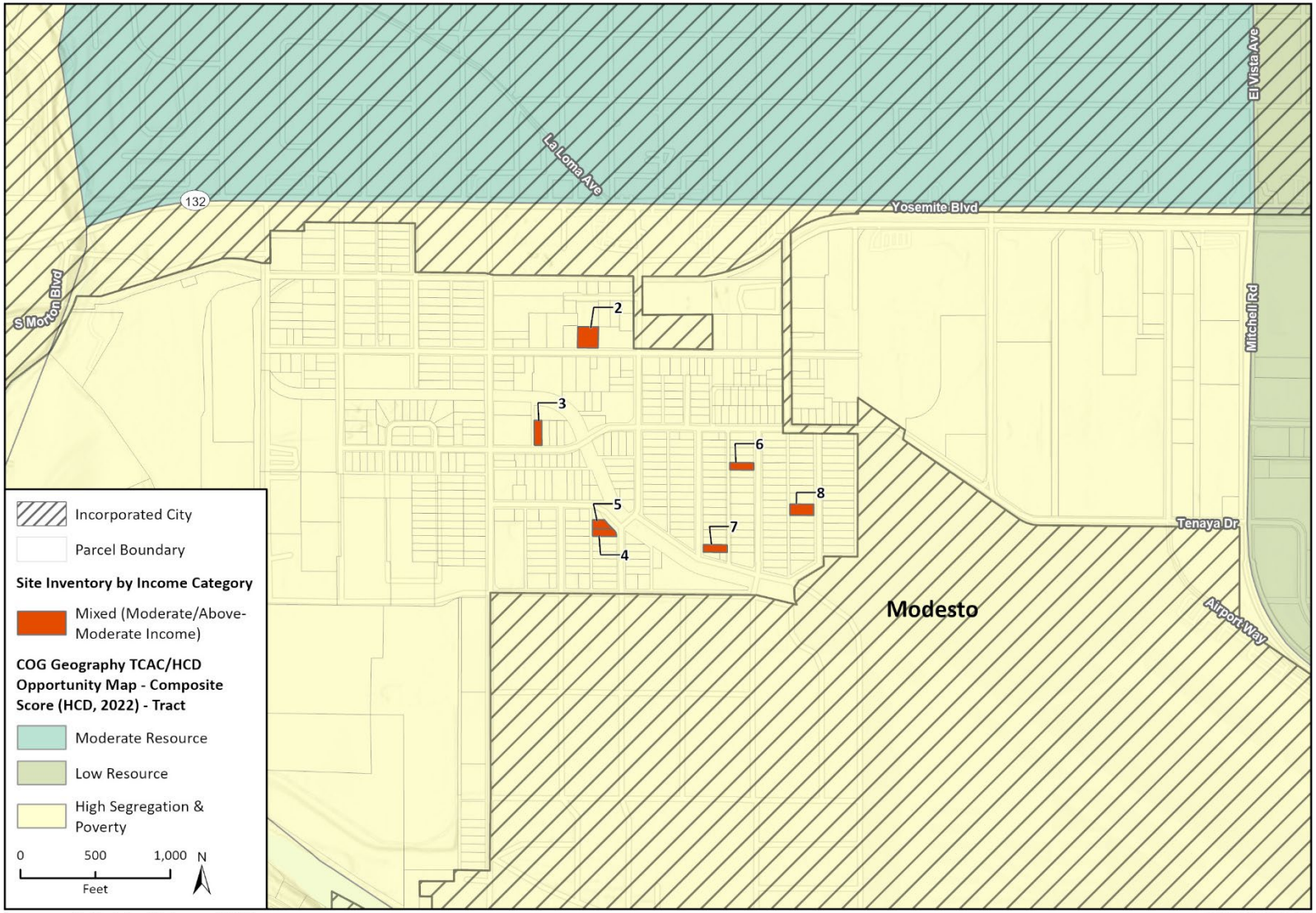


Figure 3-62 Sites Inventory, Bret Harte, TCAC Opportunity Areas

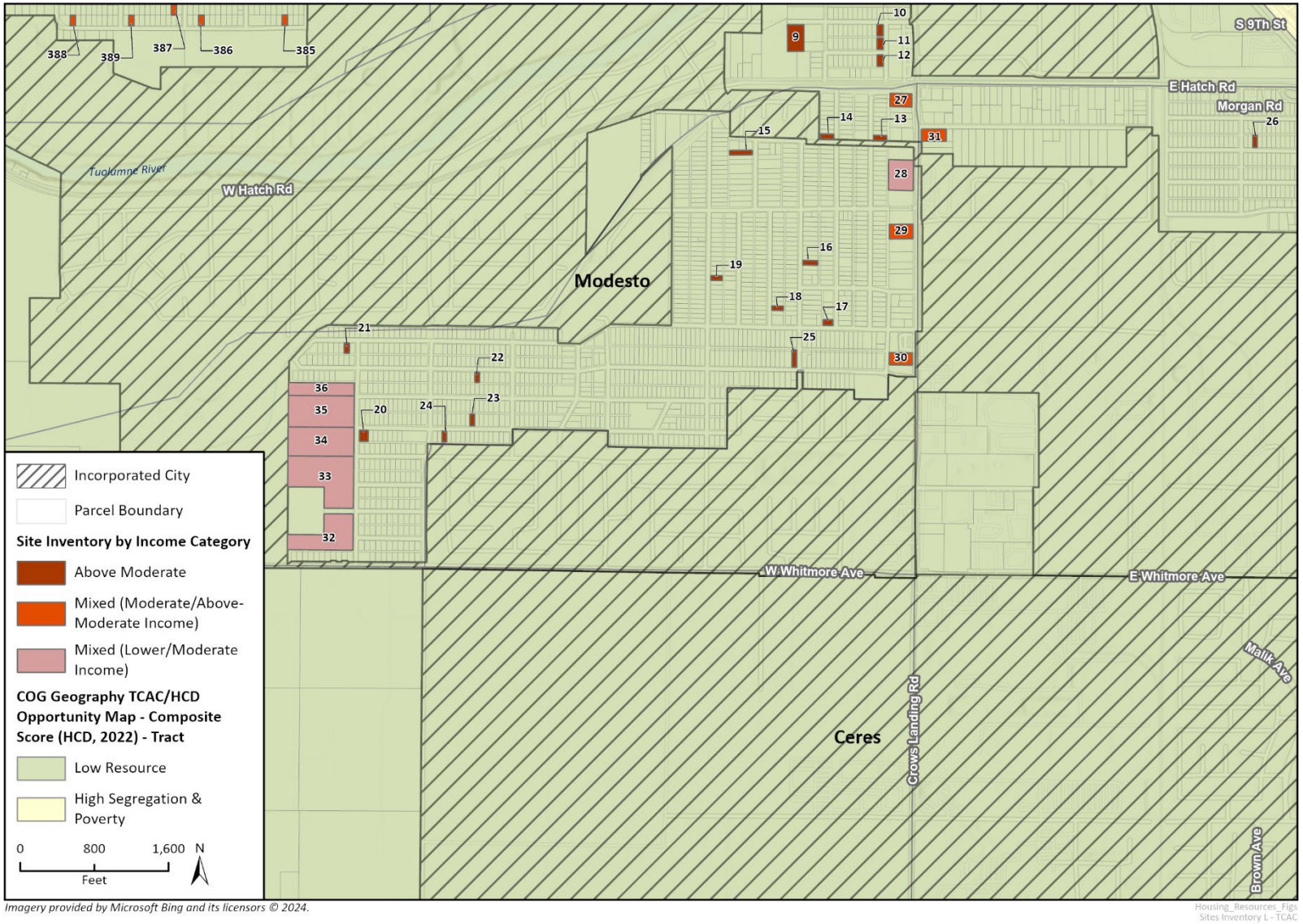


Figure 3-63 Sites Inventory, Crows Landing, TCAC Opportunity Areas

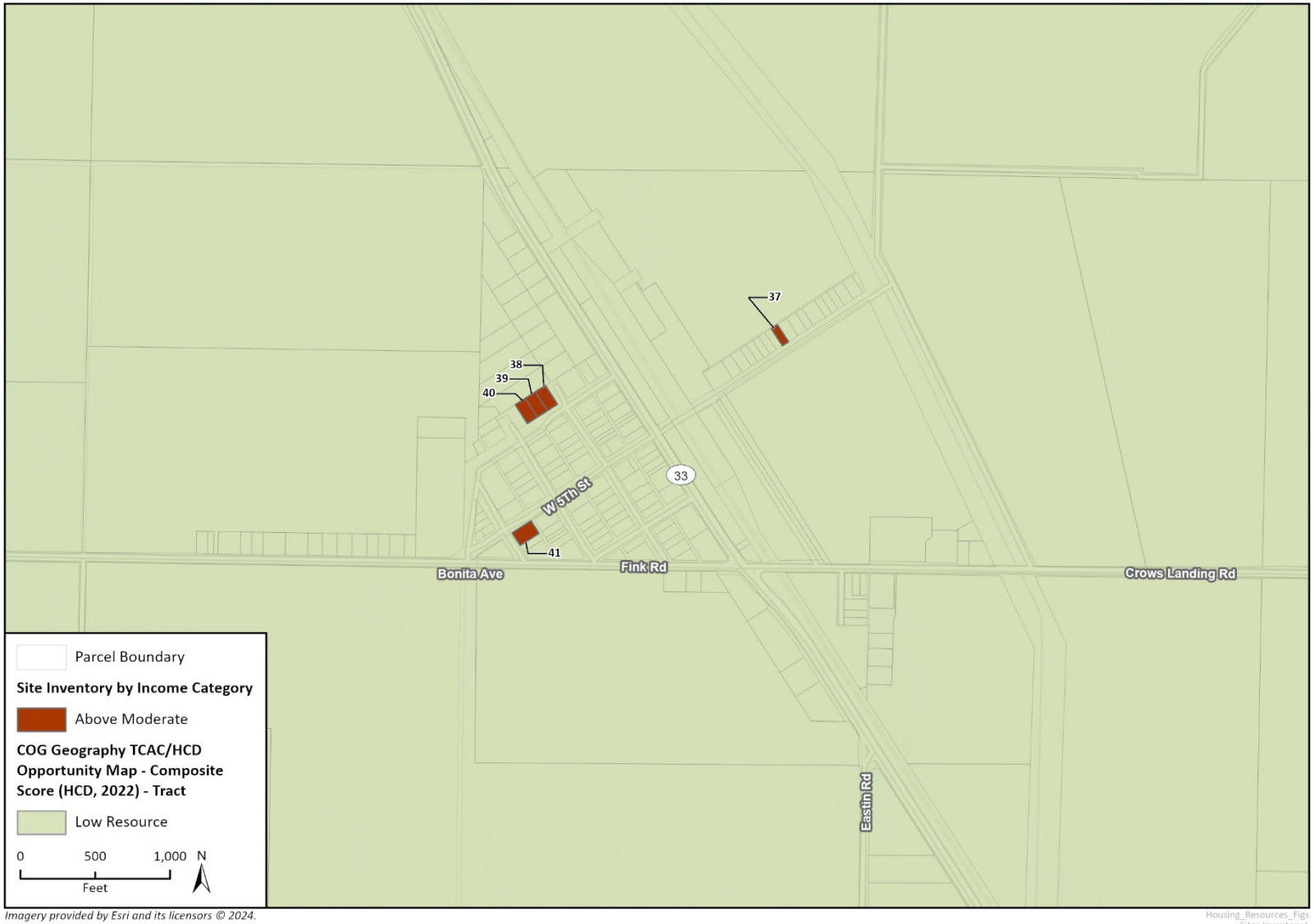


Figure 3-64 Sites Inventory, Del Rio, TCAC Opportunity Areas

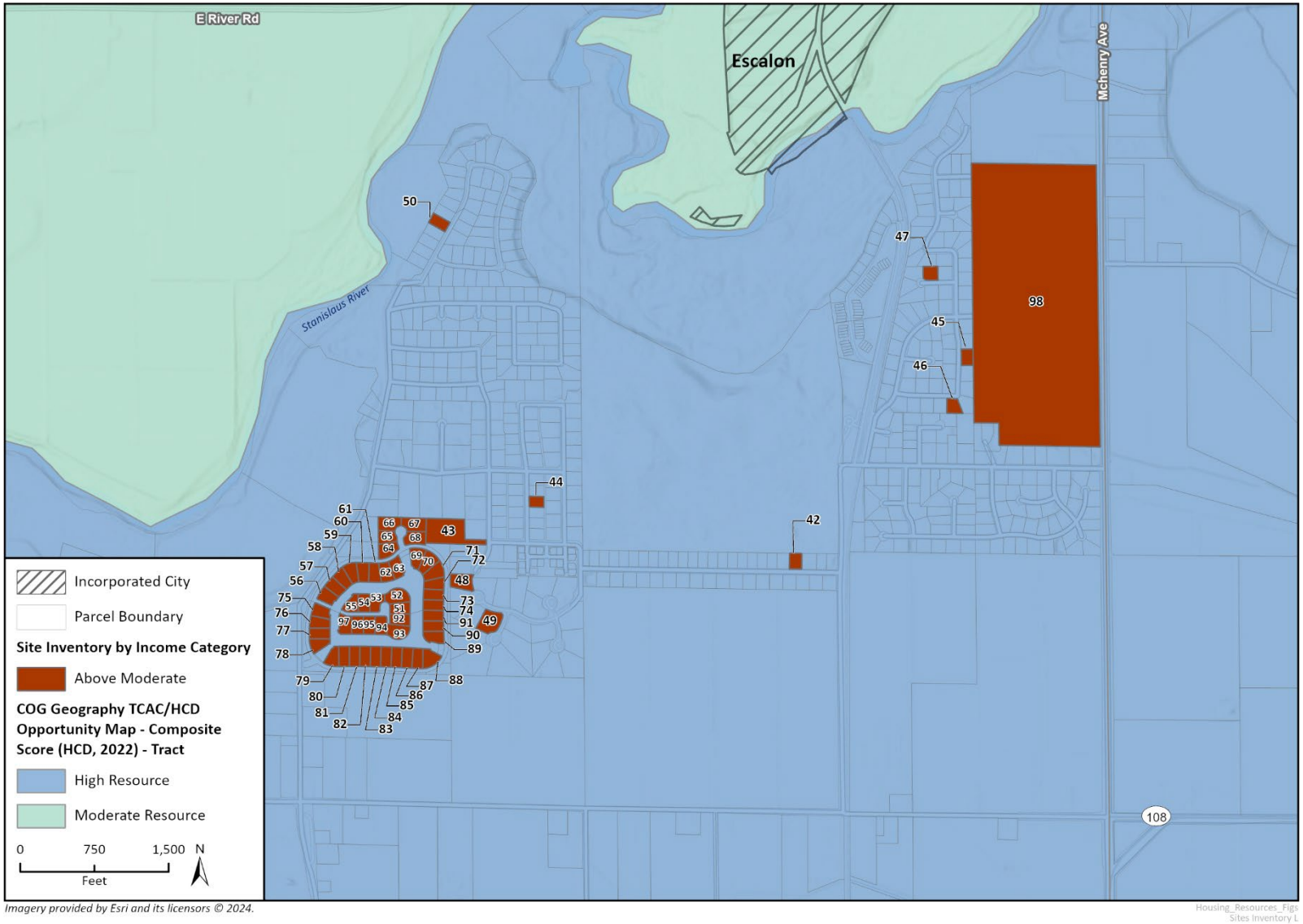


Figure 3-65 Sites Inventory, Denair, TCAC Opportunity Areas

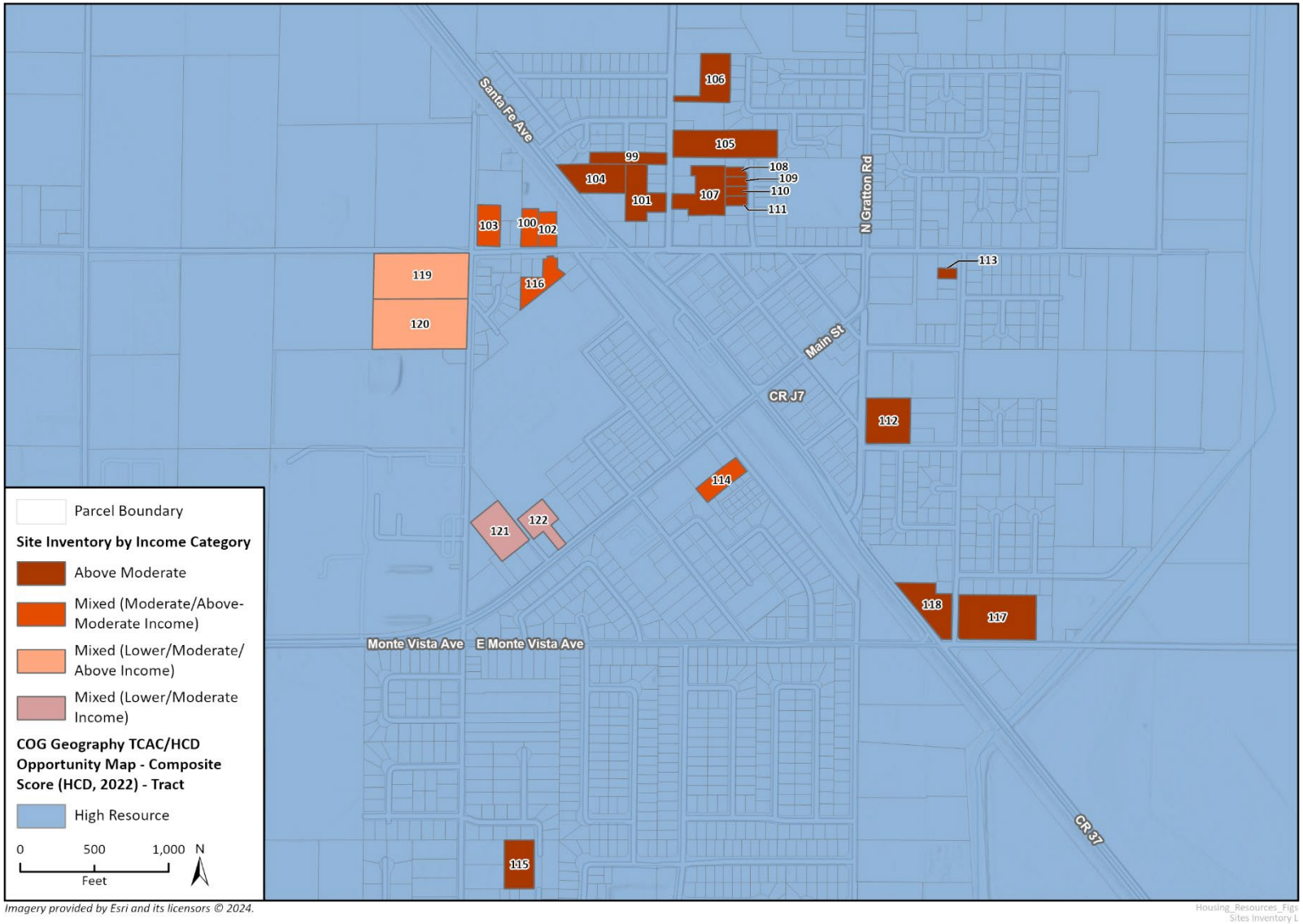


Figure 3-66 Diablo Grande Sites Inventory, TCAC Opportunity Areas

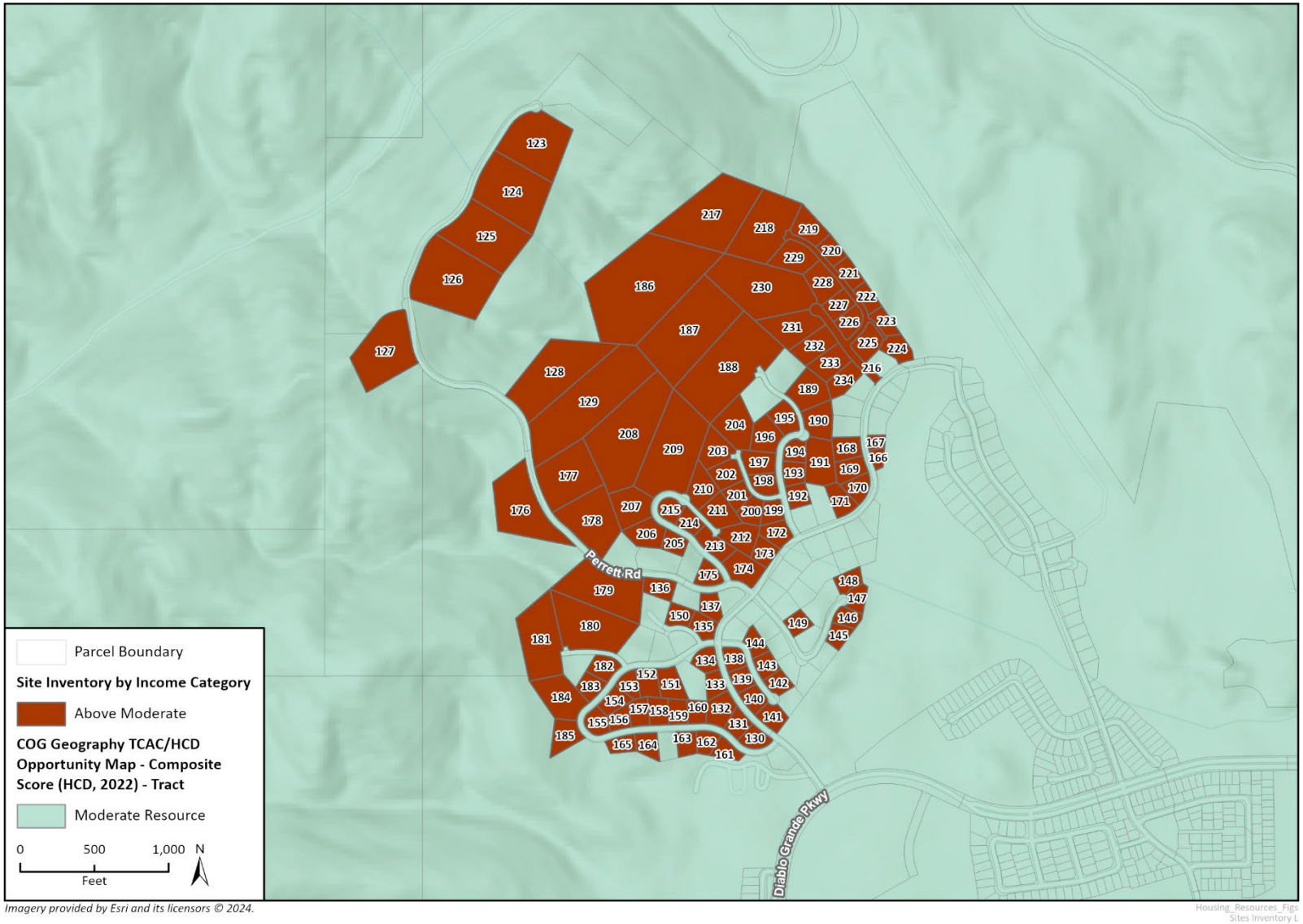


Figure 3-67 Grayson Sites Inventory, TCAC Opportunity Areas

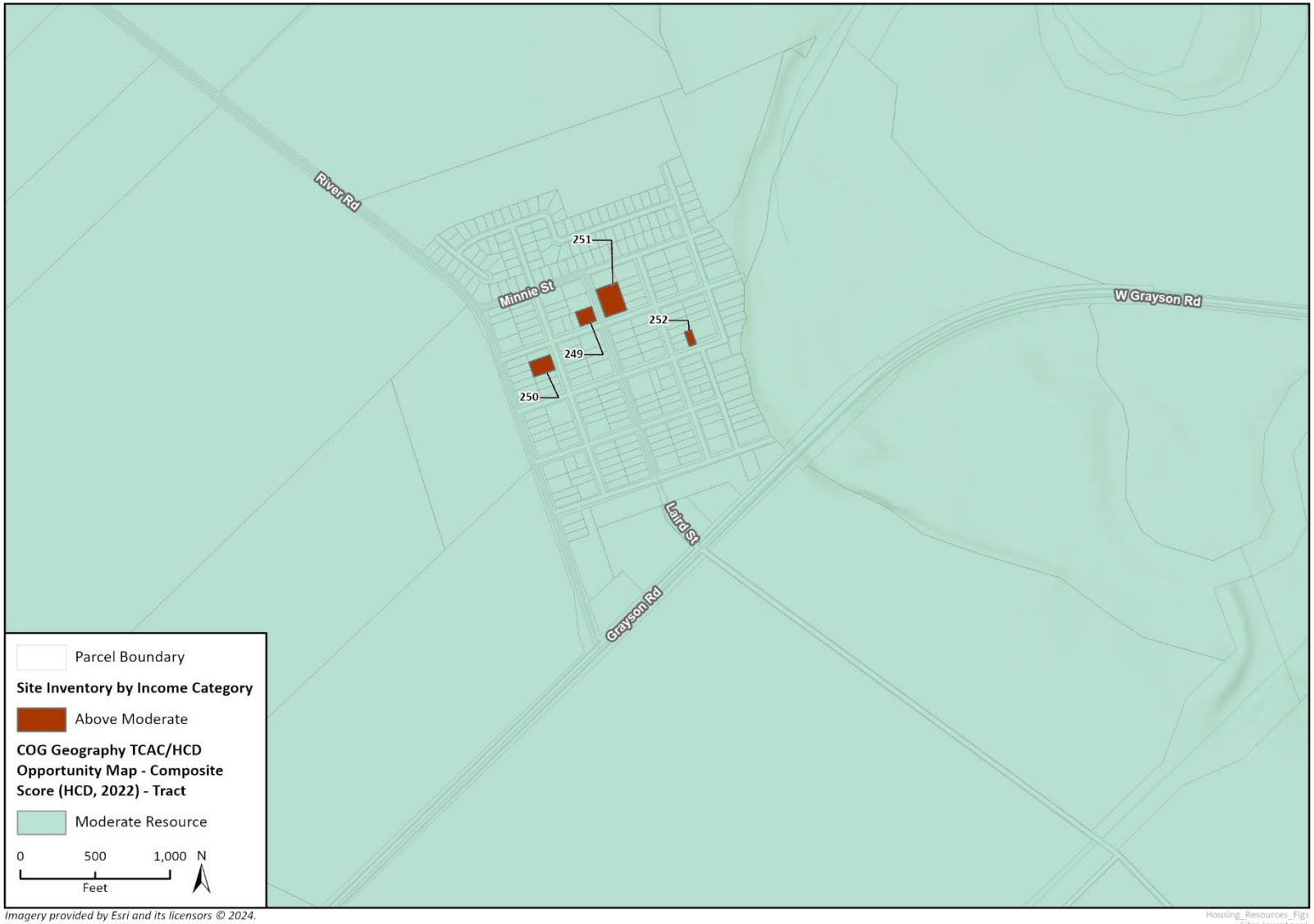


Figure 3-68 Sites Inventory, Hickman, TCAC Opportunity Areas

Figure 3-69 Sites Inventory, Keyes, TCAC Opportunity Areas

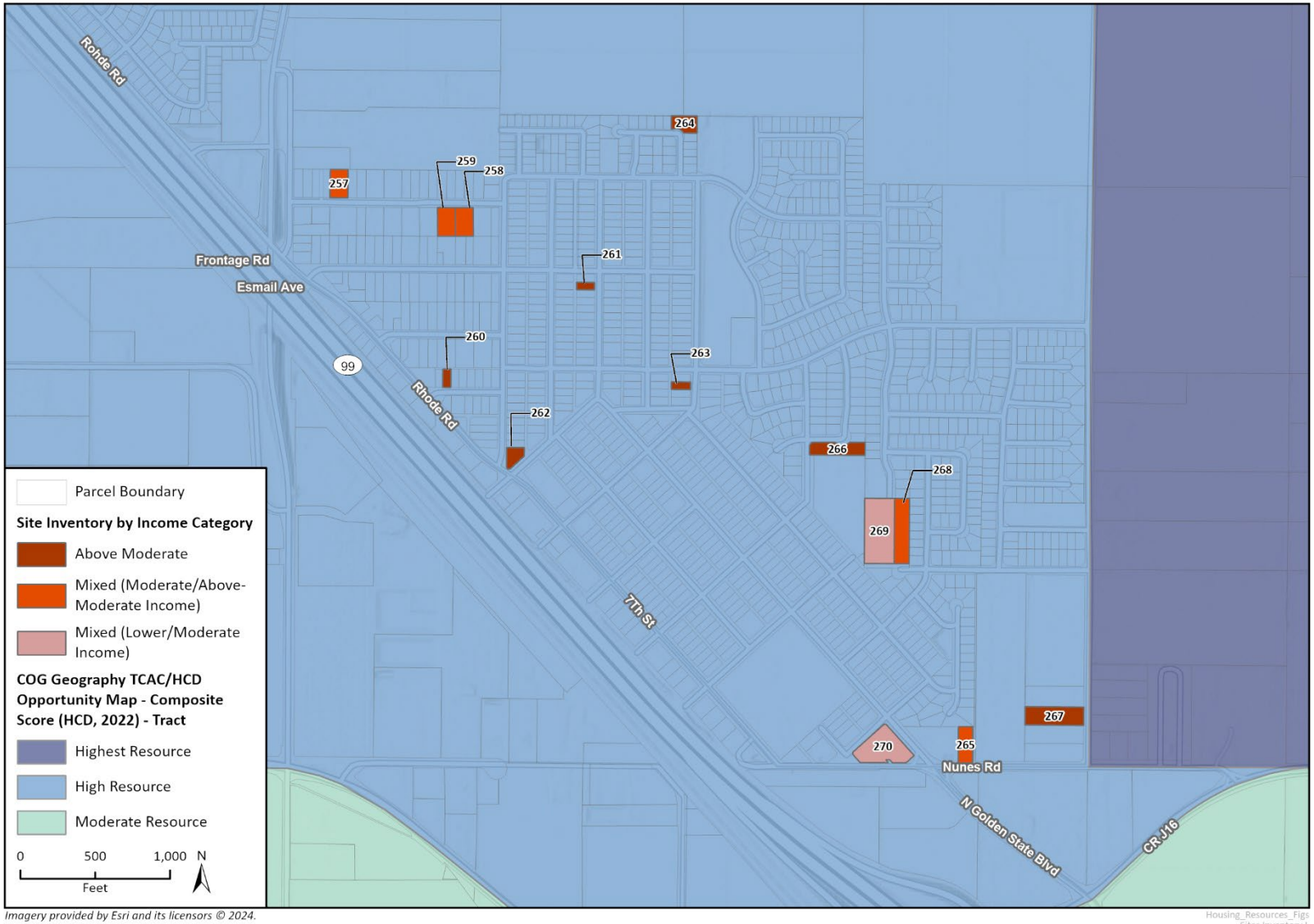


Figure 3-70 Sites Inventory, Empire, TCAC Opportunity Areas

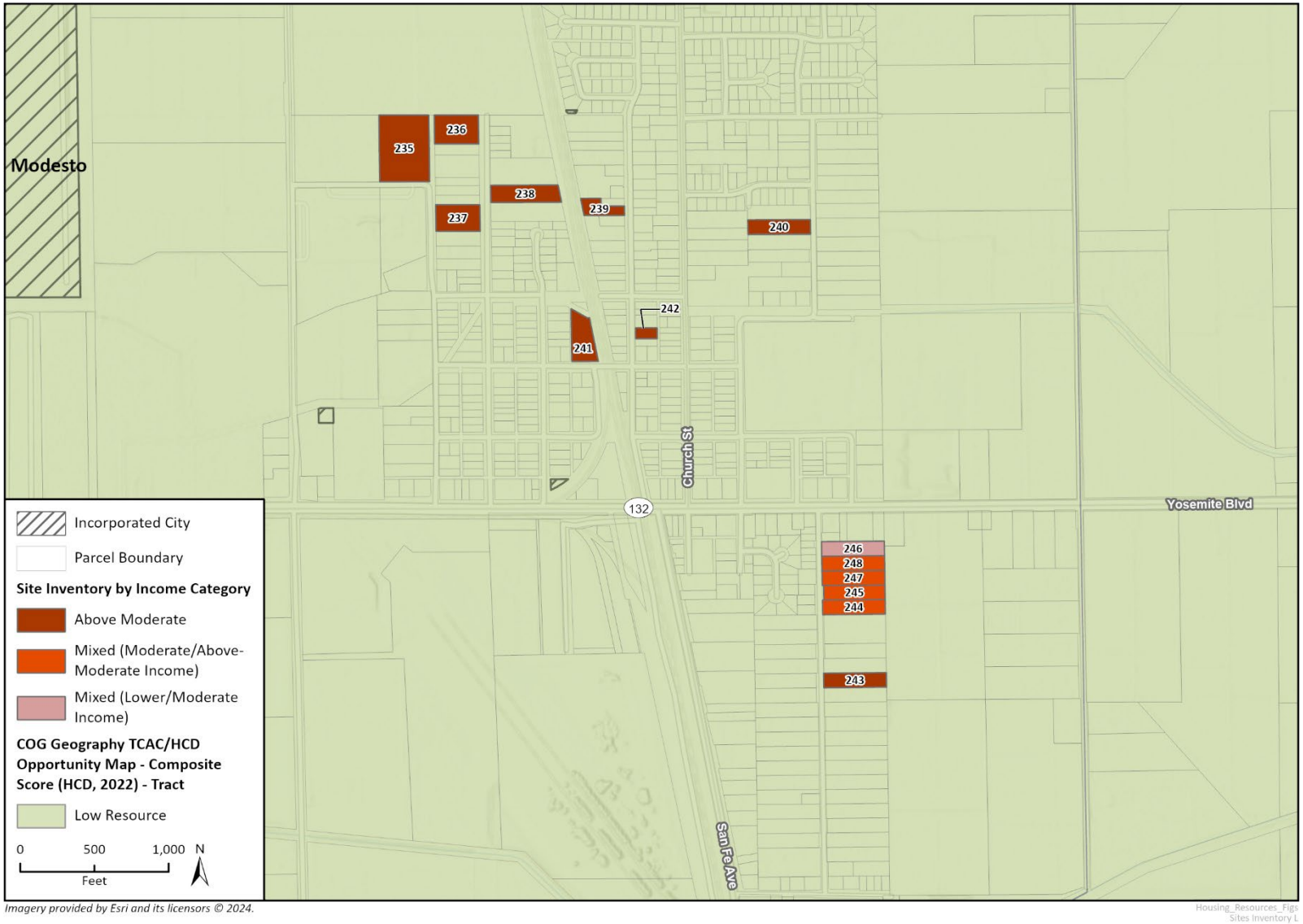


Figure 3-71 Sites Inventory, North Ceres, TCAC Opportunity Areas

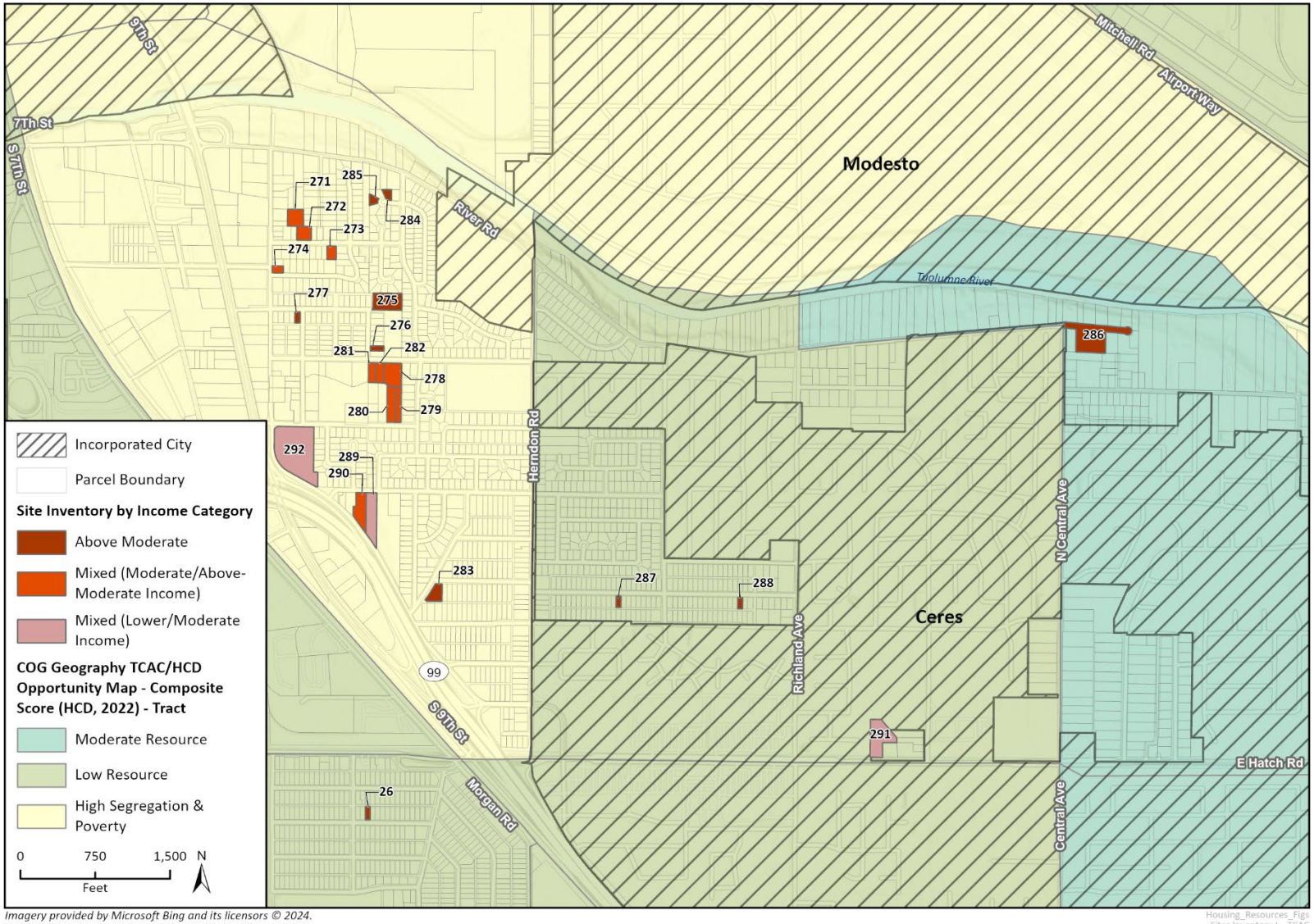


Figure 3-72 Sites Inventory, East Oakdale, TCAC Opportunity Areas

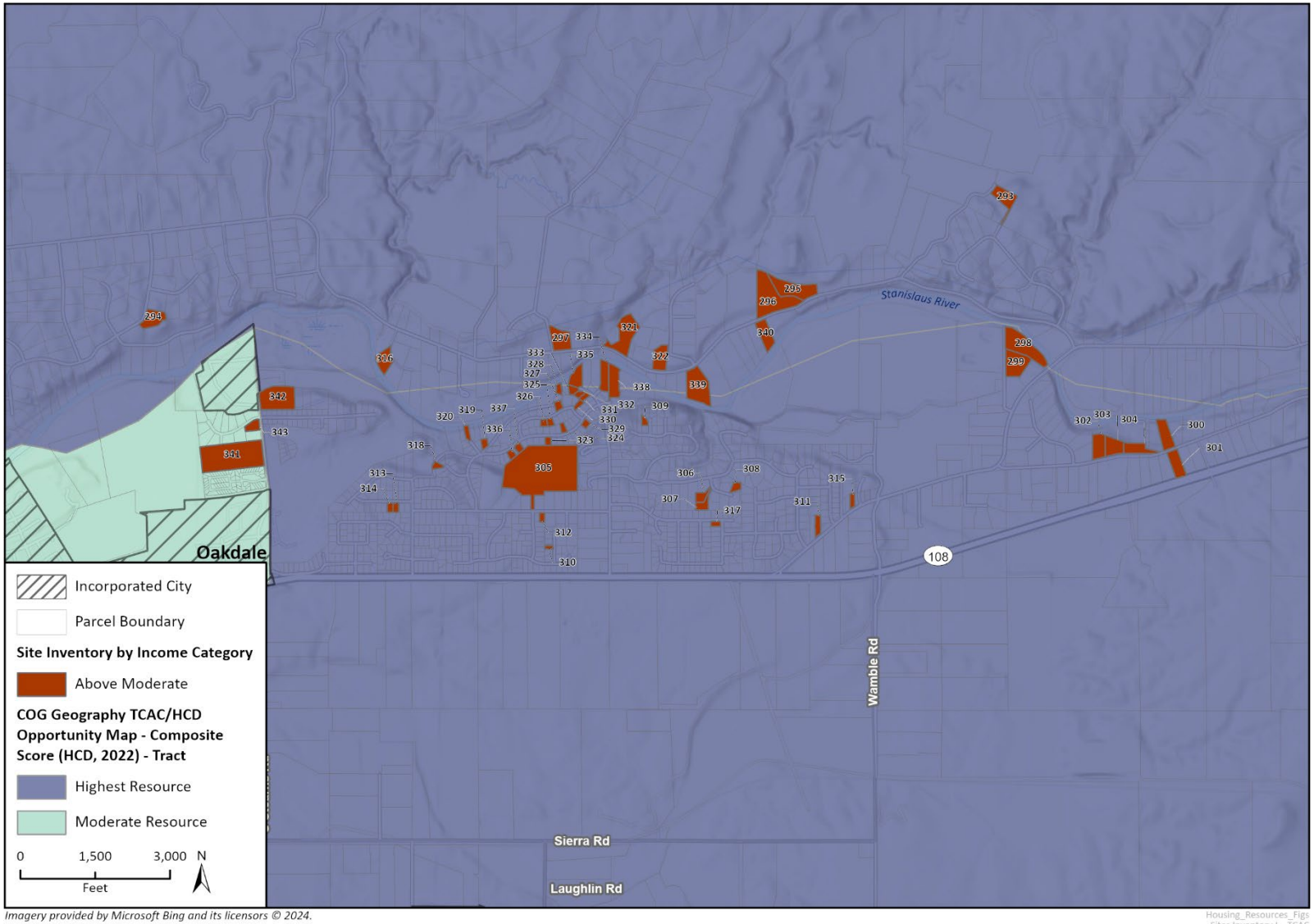
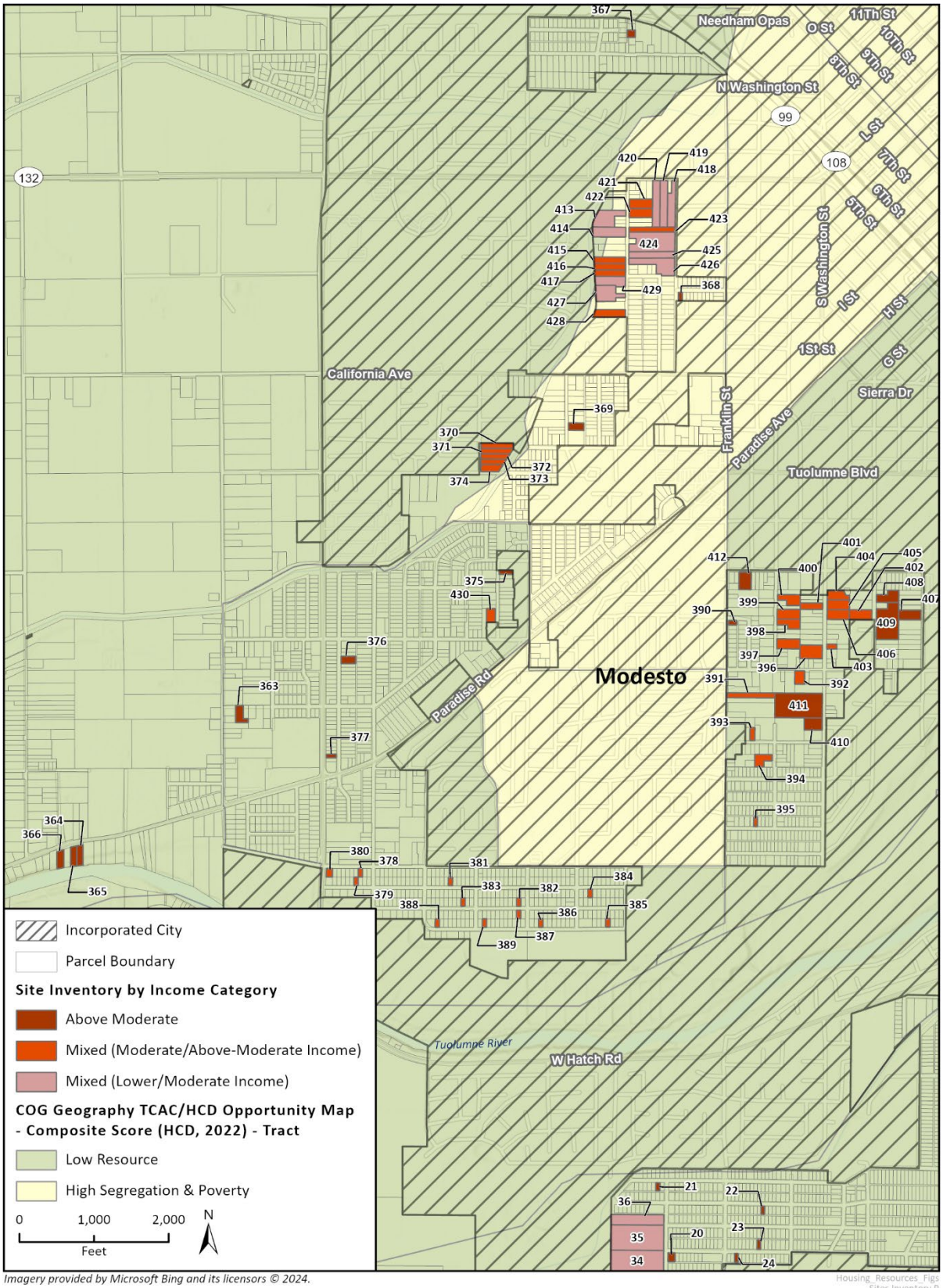


Figure 3-73 Sites Inventory, Valley Home, TCAC Opportunity Areas

Figure 3-74 Sites Inventory, West Modesto, TCAC Opportunity Areas



3.16.2 Improved Conditions

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

- 15 moderate-income and 7 above-moderate income units are located in Airport;
- 418 lower-income, 101 moderate-income, and 31 above moderate-income units are located in Bret Harte (South Modesto);
- 5 above moderate-income units are located in Crows Landing;
- 17 lower-income, 46 moderate-income, and 43 above moderate-income units are located in Empire;
- 97 lower-income, 57 moderate-income, and 26 above moderate-income units are located in North Ceres;
- 76 lower-income, 8 moderate-income, and 9 above moderate-income units are located in South Ceres;
- 7 moderate-income and 3 above-moderate income units are located in Turlock;
- 248 lower-income, 216 moderate-income, and 107 above moderate-income units are located in West Modesto.

The County has preliminarily studied five adjacent parcels as part of a feasibility analysis for the development of an affordable housing project in Empire; two of these parcels are currently included in the Sites Inventory. County staff has reached out to affordable housing developers and the property owners of the four parcels adjoining the County-owned parcel, which was previously developed with a library and resource center and is now vacant. The proximity to Empire Elementary, Empire Head Start Center, Golden Valley Health Center, and the Empire Public Library make the sites identified in the inventory, along with the three adjacent parcels, good candidates for grant funding aimed at affordable housing development.

Further development of moderate- and above moderate-income units in these Low Resource areas would potentially improve conditions by encouraging a mix of household income levels. Areas with access to public utilities (water and sewer), access to transportation, and proximity to schools are best suited to higher-density developments. Most neighborhoods in the unincorporated county are significantly constrained by the availability of infrastructure, especially High Resource areas. Per State law regarding the Sites Inventory, sites that can accommodate lower-income units must have access to public sewer and water service; therefore, High Resource areas without access to such infrastructure cannot be assumed to accommodate lower-income development.

The County will continue to implement residential rehabilitation programs, affordable housing development incentives, anti-displacement actions, and utilize annual CDBG and HOME funds to improve conditions within Low Resource and displacement-vulnerable census tracts shown on Figure 3-55.

3.16.3 Exacerbated Conditions

This AFFH analysis has shown that areas of Low Resource in Stanislaus County are more likely to have a predominant Hispanic/Latino population, a greater share of overcrowded households, and higher rates of poverty compared to neighborhoods in Moderate and High Resource areas. The sites located in the CDPs of Airport, North Ceres, and West Modesto each have sites in areas of High Segregation and Poverty. The Sites Inventory identified sites to accommodate all income levels in these areas with capacity for 345 lower-income, 289 moderate-income, and 140 above moderate-income housing units. West Modesto has the highest poverty level with 38 percent of the population whose income in the past 12 months was below the poverty level. The sites located in this area can accommodate 248 lower-income, 216 moderate-income, and 107 above moderate-income housing units. By encouraging a mixture of lower-, moderate-, and above moderate-income housing units, the Sites Inventory does not exacerbate conditions in vulnerable areas of the County, while still providing affordable housing where it is needed.

3.16.4 Unincorporated County Neighborhoods (Pockets/Islands) and County Communities

The Sites Inventory identifies housing opportunity sites within unincorporated County neighborhoods (pockets and islands within the sphere of influence of a city) and County communities (located outside a city sphere of influence). These areas have varying levels of public services and infrastructure improvements. While many have existing water service, most of these areas lack sewer service, curbs, gutters, sidewalks, and storm drainage systems. The County made an effort to concentrate housing opportunity sites in County pocket and island areas and County Communities that have existing public services and infrastructure or areas in which funding has already been allocated to make such improvements available and are anticipated to be completed during this housing element cycle.

Below is a description of the unincorporated neighborhoods (islands/pockets) located within a sphere of influence of a city included in the Sites Inventory, including how they were established, community resources, infrastructure improvements and needs, sites inventory information, and an AFFH data summary.

Airport

The Airport neighborhood is an unincorporated pocket located in the southern area of the city of Modesto, bordered by the Tuolumne River to the south, California State Highway 132 (Yosemite Boulevard) to the north, and the Beard Tract (which is developed with industrial uses) to the east, and E&J Gallo and Gallo Glass to the west. The City of Modesto is located east and north of the Airport neighborhood. In 1888, the Beard family recorded the Modesto Colony, which created 11,500 square foot lots, and the Del Este Subdivision in 1914, which also created 11,500 square foot lots, in the Airport neighborhood. In 1920 the Hermosa Tract created two-to-ten acre parcels west of Santa Cruz Avenue and the Modesto City-County Airport (MOD), located on the east side of the neighborhood, opened in 1920. The Airport neighborhood was further subdivided into 6,500 to 12,500 square-foot lots by subdivisions throughout the mid-1900s. Residents of the Airport neighborhood attend Orville Wright Elementary, located in the south end of the Airport neighborhood, or Wilson Elementary School, located north of Yosemite Boulevard, both located within Modesto's city limits. The Tuolumne River Regional Park and the Tuolumne River are located along the southern edge of the neighborhood and several local parks exist in the neighborhood including Mono, Oregon, and George Rogers parks.

The majority of the unincorporated portions of the Airport Neighborhood have been designated as Industrial Transition in the Land Use Element of the County's General Plan since the 1970s; the Industrial Transition land use designation recognizes that land adjacent to an existing industrial area may logically transition to industrial uses in the future. Accordingly, multiple blocks of land previously developed with residential uses have transitioned to industrial uses, as the result of the expansion of adjacent industrial facilities over the last 30 to 40 years. The Airport neighborhood has sewer and water connections. Sewer infrastructure was installed by the County in 2018, with CDBG and State Water Board funding. Sidewalks and bike path improvements were recently installed in portions of the Airport neighborhood through a combination of Measure L funding and Active Transportation Planning (ATP) grant funding. However, unincorporated areas of the neighborhood still lack complete curb, gutter, and sidewalks and the entire neighborhood lacks a storm drainage system.

The Sites Inventory identified eight vacant parcels totaling 1.61 acres which currently have the appropriate zoning to accommodate 15 moderate-income and seven above moderate-income units for a total of 22 units in the Airport neighborhood. Census Tract 2100, which encompasses the Airport neighborhood, is a R/ECAP area, an area of High Segregation and Poverty, with a pollution burden percentile of 93.8. Very low-income populations in this neighborhood are at-risk of displacement. The median income in this census tract is $28,924 and 75 percent of residents identify as non-white, 58.4 percent of households are cost-burdened, and 21.8 percent of households are overcrowded.

Bret Harte (South Modesto)

The Sites Inventory groups together the Bret Harte, Crater, and Parklawn neighborhoods and the commercial corridor of Crows Landing Road into the "Bret Harte" area. This area is also known more largely as the South Modesto area. The Bret Harte area is an unincorporated area located along the south edge of the City of Modesto, south of the Tuolumne River, north of Whitmore Avenue, east of Carpenter Road, and west of Highway 99. The area lies with the City of Modesto's LAFCO adopted Sphere of Influence and is bordered on the east and south by City of Ceres. There are several commercial corridors surrounding the Bret Harte area, including Crows Landing Road which runs north to south through the center of the area, and Morgan Road and S. 9th St., which are located on the eastern boundary of the area. Additional details about neighborhoods included in the Bret Harte area are provided below.

Bret Harte

The Bret Harte neighborhood is generally located north of Whitmore Avenue, south of W Hatch Road, west of Crows Landing Road, and east of S Carpenter Road. It is named for the American poet and short story writer Bret Harte best known for his writings about the California Gold Rush. The neighborhood was subdivided into lots 5,500 to 9,500 square feet in size by the South Modesto Acres Tract No. 3 in 1940, the Frazier Home Tract in 1946, the Rutherford Tract in 1947, and the Fairview Tract in 1950. The neighborhood includes Fairview Park. Children living in the area attend various schools located within the City of Modesto (Fairview Elementary School; Hanshaw Middle School, and Bret Harte Elementary School). The Salvation Army Red Shield Community Center is located on the north boundary of the middle school, also inside the City of Modesto's city limits. The Bret Harte neighborhood is in close proximity to the Crows Landing commercial corridor, located on the eastern boundary of the neighborhood, and has frequent public bus service along two routes which provide access to downtown Modesto where many services are located. Public water and sewer service is provided by the City of Modesto, which is proposed to be upgraded by the City. The Bret Harte neighborhood partially lacks curb, gutter, and storm drainage improvements. Sidewalks and bike

lanes were recently installed by the County with a mixture of local Measure L funds and ATP Grant funds along Las Vegas Street, Glenn Avenue, and Butte Avenue. ARPA funding is proposed to fund additional curb, gutter, sidewalk, and storm drainage improvements in the northeastern area of the community. The Bret Harte Landscape and Lighting District covers the Bret Harte neighborhood and provides streetlights.

The Sites Inventory includes five vacant rezone parcels, comprised of 24.37 acres surrounding Fairview Park to be rezoned from R-1 to R-3 to accommodate 445 lower-income and 41 moderate-income units. The Sites Inventory also includes 13 vacant sites to accommodate 13 above moderate-income units on parcels that already have the zoning required for such development. Census Tract 2402, which encompasses the Bret Harte neighborhood, is a R/ECAP area, Low Resource area, with lower-income populations at-risk of displacement, and a pollution burden percentile of 79.6. The median income in this census tract is $34,617, with 89 percent of residents identifying as non-white, 66.8 percent of renter households that are cost-burdened, and 15.7 percent of households that are overcrowded.

Crater

The Crater neighborhood is located north of Amador Avenue and Hatch Road, west of Crows Landing Road, and southeast of the Tuolumne River and the majority of the neighborhood is located north of W Hatch Road. The neighborhood was divided into 7,200 square foot lots by the South Modesto Acre Tract in 1940 and into 6,500 square foot lots by the Caruso Tract in 1951. The neighborhood is in close proximity to two commercial corridors, W Hatch Road and Crows Landing Road. Portions of the neighborhood have water, stormwater, curb, gutter, and sidewalk improvements. However, there is no maintenance district for the upkeep of these improvements and the neighborhood lacks public sewer service. The Bret Harte Landscape and Lighting District provides streetlights to the majority of the Crater neighborhood.

The Sites Inventory identifies four vacant parcels which already have the appropriate zoning to accommodate development of nine above moderate-income units. Census Tract 2301, which encompasses the Crater neighborhood, is an area of high segregation and poverty, with lower risk of displacement, and a pollution burden percentile of 93.8. The median income is $61,917, with 89 percent of residents identifying as non-white, 62.9 percent of renter households that are cost-burdened, and 22.9 percent of households that are overcrowded.

Crows Landing Road

Crows Landing Road is a commercial corridor which runs through the center of the South Modesto/Bret Harte area, north to south. Portions of the Road are located within the City of Modesto and Ceres city limits and portions are unincorporated. The Sites Inventory includes one vacant site and four non-vacant rezone sites along Crows Landing Road to be rezoned from General Commercial (C-2) to Mixed Use (MU) to accommodate 36 lower-income and 60 moderate-income, and 8 above-moderate income units on a total of 5.3 acres. The MU zoning district allows for high-density residential uses as well as a mixture of neighborhood commercial uses.

Parklawn

The Parklawn neighborhood is located south of E Hatch Road, west of Morgan Road, east of the Union Pacific Railroad, and north of E Whitmore Avenue. The Olympic Tract, recorded in May of 1946, created the Parklawn neighborhood, consisting of lots approximately 6,000 square-foot in size. Parklawn Park is located on the southern edge of the neighborhood. The community is surrounded

by industrial development on the south, west, and east, the County Corp Yard and Haz Mat Drop Off to the east, and a commercial corridor along E Hatch Road. There is also residential development to the west and northwest and the Crows Landing Road commercial corridor to the west of the neighborhood. Parklawn has street lights, and public water and sewer but lacks curb, gutter, sidewalk, and storm drain improvements. The County has allocated ARPA funds to support curb, gutter, sidewalk, and storm drainage improvements in the Parklawn neighborhood. The City of Modesto is partnering with the County Public Works Department to upgrade the water system while other improvements along the road right of way are occurring.

The Sites Inventory includes one vacant site in this neighborhood which already has the zoning in place to accommodate one above moderate-income unit. Census Tract 2501, which encompasses the Parklawn neighborhood, is a Low Resource area, with a lower risk of displacement, and a pollution burden percentile of 92.9. The median income in this census tract is $38,346, with 87 percent of residents identifying as non-white, 55.2 percent of renter households that are cost-burdened, and 6.6 percent of households that are overcrowded.

Other County pockets in the Bret Harte/South Modesto area, that do not have sites identified in the Sites Inventory, include the Flamingo and Modesto Flea Market neighborhoods which are zoned for commercial and industrial uses and the Olivero and Riverdale Park Tract neighborhoods, which are predominately residential areas, but which have infrastructure limitations such as a lack of public sewer, curb, gutter, sidewalk, street lighting, and storm drainage improvements. The City of Modesto is in the process of connecting the Riverdale Park Tract neighborhood to their municipal water service due to issues with the existing CSD system.

Empire

The Empire neighborhood is located on the east side of the City of Modesto, and the Beard Tract, south of Dry Creek, and north of the Tuolumne River, within the City of Modesto's SOI. Yosemite Boulevard (State Highway 132) is a commercial corridor running west to east through the center of the neighborhood and Santa Fe Avenue and the Burlington Northern Santa Fe Railroad runs north to south through the neighborhood. Empire is named indirectly for the original Empire City which had been situated on the opposite bank of the Tuolumne River, from where the present town is located, which operated as a ferry crossing and trading post during the gold rush. The early settlement, which had once been the Stanislaus County seat, became deserted with the decline of the river boat trade. The community along the river was destroyed and rebuilt two times before relocating to its current location near the Burlington Santa Fe Railroad, in 1908, when the railroad station and a few buildings were erected on the present site. The Empire neighborhood includes Empire Elementary, Empire Community Park and Pool, Empire Head Start Center, Empire Library and Teel Middle School, all located within the Modesto's city limits. Glick Middle School is located on the western edge of the community; and Johansen High School is located on the northwestern edge of the community, also within the City of Modesto. The Empire Migrant Labor Camp, operated by the Stanislaus Regional Housing Authority, which is also utilized as a cold winter emergency shelter for homeless families, is located on the southern side of the community. Bus stops are located along Yosemite Boulevard and along Santa Fe Avenue and S Abbie Road, which provide transportation from Empire to Riverbank and along Yosemite Boulevard, providing transportation from the Downtown Modesto Transit Center to the City of Waterford. The City of Modesto provides water and sewer service to the community. The majority of the Empire neighborhood lacks curb, gutter, sidewalk, and storm drainage improvements; however, some areas of the neighborhood do have such improvements. Stormwater improvements were constructed in 2011 using Redevelopment Agency funds, but the stormwater project was never

completed due to the dissolution of redevelopment agencies by the State of California. The County has allocated Building Community Infrastructure Funds (BCIF) to the Empire Storm Drain Trunk Line project, which will fund a portion of the costs for design and construction of a storm drain trunk which will provide a positive flow outfall for the overall storm drain system in Empire.

The Sites Inventory proposes to rezone one vacant County-owned site and four non-vacant sites from R-A to R-3 in this neighborhood to allow for 17 lower-income, 46 moderate-income, and 8 above moderate-income sites (71 units total), on a combined total of 4.77 acres. The Sites Inventory also includes nine vacant and underutilized sites which already have the zoning in place to accommodate 35 above moderate-income units on 11.11 acres. Census Tract 2002, which encompasses the Empire neighborhood, is a Low Resource area, with lower-income households at-risk of displacement, and a pollution burden percentile of 89.3. The median income in this census tract is identified as $47,967, with 61 percent of residents identifying as non-white, 38.7 percent of renter households that are cost-burdened, and 4.2 percent of households that are overcrowded.

North Ceres

The Sites Inventory groups together the Bystrom, Ceres-River Road, Hatch/Stonum, and Ceres/Herndon neighborhoods into the "North Ceres" area. The North Ceres area is an unincorporated area located mostly south of the Tuolumne River and the City of Modesto, east of State Highway 99, north of E Hatch Road, and west of Mitchell Road, within the SOI of the City of Ceres. Some of the North Ceres area receives water and sewer from the City of Modesto and others from the City of Ceres. The North Ceres area is served by two bus routes which connect the Downtown Modesto Transit Center, through the City of Ceres and Community of Keyes, to the City of Turlock. Additional details about the neighborhoods included in the North Ceres area is provided below:

Bystrom

The Bystrom neighborhood is located south of the Tuolumne River, east of S 9th Street and Highway 99, and west of Herndon Road in the North Ceres/South Modesto area. The Smee Tract developed five to 14 acre lots in the Bystrom neighborhood, east of the Union Pacific Railroad (previously the Southern Pacific Railroad), in 1904. In 1909, the Sunset Tract developed 14 to 19 acre lots on the eastside of the Bystrom neighborhood. The neighborhood was further subdivided into lots 5,900 to 11,000 square feet in size throughout the mid and late 1900s. The S 9th Street corridor, which is located on the western edge of the Bystrom neighborhood, is zoned General Commercial but is developed with uses that are more industrial in nature. E Hatch Road is located on the southern end of the neighborhood which is developed with a variety of commercial uses. Tuolumne Elementary School and Mancini Park are located on the eastern side of the Bystrom neighborhood. Portions of the neighborhood has public sewer and the majority of the neighborhood lacks stormwater, curb, gutter, and sidewalk improvements. However, the majority of the Bystrom neighborhood has public water and streetlights.

The Sites Inventory includes three non-vacant rezone sites in this neighborhood to be rezoned from R-A to R-3, which can accommodate 77 lower-income units, 16 moderate-income units, and one above-moderate income units, and 15 vacant and underutilized sites in Bystrom, which can accommodate a total of 39 moderate-income and 18 above-moderate income units. Census Tract 2302, which encompasses the Bystrom neighborhood, is an area of high segregation & poverty, with the very low-income population at-risk of displacement, and a pollution burden percentile of 88.5. The median income in this census tract is $36,102, with 84 percent of residents identifying as non-

white, 72.6 of renter households that are cost-burdened, and 22.7 percent of households that are overcrowded.

Hatch/Stonum

The Hatch/Stonum neighborhood is located at the northwest corner of E Hatch Road and Stonum Road, in the northern area of the City of Ceres, within the City of Ceres SOI. The neighborhood is made up of six residential parcels ranging from 0.16 to 4.26 acres in size which were not created by subdivisions, but rather by the deeding of land. Adkison Elementary is located north and the Howard Training Center, a center for persons with disabilities, is located just east of the neighborhood, both within the City of Ceres limits. The neighborhood is served with water and sewer but lacks curb, gutter, sidewalk, and storm drain improvements.

The Sites Inventory proposes to rezone one underutilized site in the Hatch/Stonum neighborhood from R-A to R-3 to allow for 22 units, made up of 20 lower-income units and two moderate-income units. Census Tract 2702, which encompasses the Hatch/Stonum neighborhood, is a Low Resource area, with a lower risk of displacement, and a pollution burden percentile of 72.9 percent. The median income in this census tract is $55,607, with 84 percent of households identifying as non-white, 53.9 of renter households are cost-burdened, and 15.9 percent of households are overcrowded.

Ceres-River Road

The Ceres-River Road neighborhood is located south of the Tuolumne River and the City of Modesto, west of Mitchell Road, east of Herndon Road, and north of Nadine Avenue and the city of Ceres, within the City of Ceres SOI. This neighborhood is made up of large residential parcels typically one to two acres in size which were created by the deeding of land and by a series of parcel maps. Mancini Park and Tuolumne Elementary school are located just west of the neighborhood. The neighborhood lacks water, sewer, stormwater, curb, gutter, and sidewalk, and has partial streetlights. Northern portions of the parcels adjacent to the Tuolumne River in the neighborhood are in the floodway.

The Sites Inventory includes one vacant parcel, 2.4 acres in size, in this neighborhood which already has the appropriate zoning to accommodate five above moderate-income units. Census Tract 2701, which encompasses the eastern half of the Ceres-River Road neighborhood, is a Low Resource area, with a lower risk of displacement, and a pollution burden percentile of 44.2. The median income in this census tract is $77,269, with 57 percent of residents identifying as non-white, 49.7 of renter households that are cost-burdened, and 0.3 percent of households that are overcrowded. The western half of the Ceres-River Road neighborhood is a Low Resource area in Census Tract 2702, described above in the in the Hatch/Stonum neighborhood description.

Ceres-Herndon

The Ceres-Herndon neighborhood is located east of the Bystrom neighborhood and Herndon Road; south of the Ceres-River Road neighborhood; north of Nadine Avenue; and west of Richland Avenue, within the City of Ceres SOI. The neighborhood was developed into 6,000 to 8,600 square foot lots by the Richland Tract in 1946, Richland Tract No. 2 in 1947, Herndon Estates Tract in 1971, Tempo Park Tract No. 1 in 1970, and Tempo Park No. 2 in 1979. E Hatch Road is located on the southern end of the neighborhood and is developed with a variety of commercial uses. The Tuolumne Elementary School is located to the northeastern of the neighborhood, within the Bystrom neighborhood. The neighborhood has water and partial sewer, but lacks stormwater, curb, gutter, and sidewalk. The Ceres-Herndon neighborhood was awarded ARPA funds which are proposed to fund curb, gutter, sidewalk, and storm drainage improvements.

The Sites Inventory includes two vacant sites in this neighborhood that have the appropriate zoning in place to accommodate two above moderate-income units. The Ceres-Herndon neighborhood is a Low Resource area in Census Tract 2702, which is described above (in the Hatch/Stonum neighborhood description).

Wallin/Payne

Wallin/Payne is a County island in the North Ceres area, located north of E. Hatch Road, south of River Road, between Richland Avenue and Moffett Road. Portions of the neighborhood has public water and the entire neighborhood lacks sewer, stormwater, curb, gutter, sidewalk, and streetlight improvements.

No parcels in this neighborhood are included in the Sites Inventory due to a lack of water and sewer service and a lack of vacant and underutilized parcels in the neighborhood. The Wallin/Payne neighborhood is in Census Tract 2702, which is described above (in the Hatch/Stonum neighborhood description).

South Ceres (Laurel/Central)

The Laurel/Central neighborhood is located east of Central Avenue, west of Highway 99, north of E. Service Road, and south of Industrial Way in an unincorporated pocket on the southside of the City of Ceres. Residential uses surround the neighborhood to the west, east, and south and industrial development surrounds the neighborhood to the north along Highway 99. The neighborhood was created in 1922 with the Estate Acres subdivision which created 13 lots five to 14 acres in size. The portions of the neighborhood located north of Don Pedro Road were further subdivided into 6,000 to 8,000 square-foot lots by the McQuary Tract and Dillon-Morrow Tract in 1944, the Riggs Tract in 1945, the Don Pedro Estates in 1979; the properties between E Service and Don Pedro Roads were further subdivided into half-acre to 1.5 acre lots by various parcel maps. Don Pedro Elementary School and Don Pedro Park are located west of the neighborhood, within the City of Ceres limits, and Central Valley High School and Ceres Adult School are located to the southwest of the neighborhood in the unincorporated area, on the south side of Service Road, in an unincorporated County area. The neighborhood is served by the Laurel Landscape and Lighting District and portions of the neighborhood lack water, sewer, curb, gutter, sidewalk, and storm drainage improvements.

The Sites Inventory includes one rezone site in this neighborhood which can accommodate 76 lower-income and 7 moderate-income units (83 units total) on a 4.18-acre parcel located adjacent to a duplex development. The Sites Inventory also includes six vacant and underutilized sites, totaling 2.93 acres in size, which already have the appropriate zoning in place to accommodate one moderate-income and nine above moderate-income units. Census Tract 2503, which encompasses the Laurel/Central neighborhood, is a Low Resource area, with lower-income households at-risk of displacement, and a pollution burden percentile of 77.5. The median income in this census tract is identified as $49,810, with 68 percent of residents identifying as non-white, 49.8 percent of renter households that are cost-burdened, and 10.0 percent of households that are overcrowded.

Turlock (Kenwood/Star)

The Turlock (Kenwood/Star) neighborhood is an unincorporated island located in the center of the City of Turlock, south of E Hawkeye Avenue, north of W Canal Drive, east of N Golden State Boulevard and Geer Road, and west of N Olive Avenue. The eastern half of the neighborhood was developed into 3,500 square foot lots by the Kenwood Park Tract in 1910 and the southwestern portion was

developed into 7,600 square foot lots by the Turlock Tract in 1913. Marvin Dutcher Middle School is located northeast and Crane Park is located east of the neighborhood within Turlock city limits. The neighborhood is in close proximity to the StanRTA bus Route No. 10 which provides service between the downtown Modesto Transit Station through the City of Turlock. The area has public water, sewer and lacks curb, gutter, sidewalk, and storm drain improvements. The Kenwood/Star neighborhood has been awarded ARPA funding to develop curb, gutter, sidewalk, and storm drainage improvements in the neighborhood.

The Sites Inventory includes three vacant and underutilized sites, .80 acres total, which already have the appropriate zoning in place to accommodate seven moderate-income and three above moderate-income units. Census Tract 3906, which encompasses the Turlock (Kenwood/Star) neighborhood, is a Low Resource area, with lower-income households at-risk of displacement, and a pollution burden percentile of 47.1. The median income in this census tract is $34,500, with 64 percent of residents identifying as non-white, 60.2 percent of renter households that are cost-burdened, and 4.6 percent of households that are overcrowded. Other unincorporated pockets surrounding the City of Turlock include the Berkeley, South Turlock – 5th Street, South Turlock – 8th Street/9th Street, Lander/Linwood, and the Montana neighborhoods. The Berkeley and South Turlock – 5th Street neighborhoods have public water but no other infrastructure improvements. The other neighborhoods have no public water, sewer, or curb, gutter, sidewalk, or storm drain improvements.

West Modesto

The Sites Inventory groups together the Elm/Emerald, Spencer/Marshall, Rouse/Colorado, California/Briggs, Robertson Road, Beverly/Waverly neighborhoods into the "West Modesto" area. The West Modesto area is an unincorporated area located along west of the City of Modesto, north of the Tuolumne River, south of Maze Boulevard, and east of Carpenter Road, within the City of Modesto SOI. The West Modesto area has frequent public bus service which provides access to downtown Modesto where many services are located. The Stanislaus Regional Transit Authority (StanRTA) provides bus service to the West Modesto area from the Downtown Modesto Transit Center along Maze Boulevard, Carpenter Road, and Paradise Avenue to the City of Ceres. Several commercial corridors are adjacent to the West Modesto area, including Maze Boulevard which runs east to west through the area and Paradise Avenue which runs diagonally through the center of the area.

Proposed rezoning in West Modesto is primarily focused on the Spencer/Marshall neighborhood, which is the County's current priority for sewer infrastructure improvements. The design, engineering, and environmental assessment phase of the Spencer/Marshall sewer project (one of three neighborhoods included in the West Modesto Sewer Infrastructure Project) have been completed and two of five phases have been constructed utilizing CDBG funding administered by the County as a federal entitlement jurisdiction. The County is actively working with the State Water Board to finalize the funding to complete installation of the Spencer Marshall sewer project. Additional details about each of the neighborhoods in the West Modesto area is provided below:

Beverly/Waverly

The Beverly/Waverly neighborhood is located mostly north of Paradise Road, east of Carpenter Road, and south of Chicago Road. The Paradise Colony subdivision map created 10- to 20-acre parcels in the area in 1903. The Paradise Park Tract subdivision further subdivided these lots into two-acre lots in 1916. Between 1928 and 1945 the neighborhood continued to be subdivided into smaller lots ranging in size between 5,000 to 9,000 square-feet by the Paradise Homes subdivision, the Paradise Orchard

Tract, the Paradise Homes First Addition, and the Paradise Terrace subdivision. The neighborhood includes the Burbank-Paradise Fire District station and Burbank-Paradise Park, where a local office for the Police Activities League is located, in the unincorporated area and the Burbank-Paradise Elementary School, which is located within Modesto's city limits. This area has public water and is included in the West Modesto Infrastructure Project area for planned sewer improvements. However, this neighborhood lacks curb, gutter, sidewalk, and storm drainage improvements.

The Sites Inventory includes one non-vacant rezone site in this neighborhood that is one-half acre in size and can accommodate 6 moderate- and above moderate-income units. In addition, this neighborhood includes three vacant sites in the Beverly/Waverly neighborhood and four additional sites west of Carpenter Road (one on Waverly Road and three on Paradise Road) that can accommodate eight above moderate-income units. The eastern half of the Beverly/Waverly neighborhood is in Census Tract 1603, described below (in the Robertson Road neighborhood description), and the western half is in Census Tract 1500, described below (in the Elm/Emerald neighborhood description).

California/Briggs

The California/Briggs neighborhood is primarily located south of California Avenue, west of Spencer Avenue, east of Panama Drive, and north of Houser Lane. The neighborhood was first created with the recording of the Brichman's Addition to the City of Modesto, recorded on October 1904, which created five acre lots and was further sub-divided into smaller lots later with the Wheatly Tract, recorded in 1946, the Bird Tract No. 1, recorded in 1964, and the Briggs Avenue Subdivision, recorded in 1998. Central Catholic Highschool, Mark Twain Junior Highschool, and Mark Twain Park are located just northwest of the neighborhood within the City of Modesto city limits. The Dr. Martin Luther King Jr. Park, which contains the West Modesto King Kennedy Neighborhood Community Center, and Mellis Park are located on the northeast of the neighborhood, in the City of Modesto city limits. The neighborhood has public water and there is a public sewer line that runs down the center of the area through Seybold Avenue. However, the neighborhood does not have curb, gutter, sidewalk, or storm drainage improvements.

The Sites Inventory includes six vacant and underutilized sites, which currently have the appropriate zoning to accommodate the development of 31 moderate-income and seven above moderate-income units. The California/Briggs neighborhood is in Census Tract 1601, which is described below (in the Spencer/Marhsall neighborhood description).

Elm/Emerald

The Elm/Emerald neighborhood is located east of Emerald Avenue, South of Highway 132, north of Maze Boulevard, and west of Highway 99. The Map of Maze Ranch subdivision, recorded March of 1909, subdivided lots ranging between 20 to 55 acres in size in a swath of land that includes the Elm/Emerald neighborhood. The area was further subdivided into 7,300 square-foot lots by the Map of Emerald Acres subdivision, recorded in June of 1950, and a series of parcel maps. The Franklin Elementary and Preschool are located south of the neighborhood across Maze Boulevard, within Modesto city limits. The neighborhood is currently served with public water by the City of Modesto and has intermittent curb, gutter, and storm drain improvements. The neighborhood is lacking sidewalks, streetlights, and public sewer.

The Sites Inventory includes one vacant site in this neighborhood, which is 0.25 acres in size, that can accommodate one above moderate-income unit. Census Tract 1500, which encompasses the Elm/Emerald neighborhood is a Low Resource area, with a lower risk of displacement, and pollution

burden percentile of 92.9. The population of within this census tract consists of 68 percent non-white residents with a median income of $71,290. Approximately 52.5 percent of renter households in the West Modesto area are cost burdened and 12.2 percent of households are overcrowded.

Robertson Road

The Robertson Road neighborhood is located east of Carpenter Road, south of Robertson Road, north of the Tuolumne Rover, and west of Hays Street. The neighborhood was established with the River View Tract, which created 7,000 square foot lots in 1945. Robertson Road Elementary and Child Development Center, Golden Valley Health Center, Harriette Kirschen Elementary, and Robertson Road Park are located just north of the neighborhood within the city limits of the City of Modesto. Bellenita Park and the Tuolumne River Regional Park are located to the south of the neighborhood, within Modesto city limits. The City of Modesto's wastewater treatment plant is located east of the neighborhood. The neighborhood has both public water and sewer; but does not have curb, gutter, sidewalk, or storm drainage improvements. The County is in the process of applying for ATP funds, to be leveraged with Measure L funds, to install sidewalks in the neighborhood.

The Sites Inventory includes 12 vacant sites in this neighborhood, which currently have the appropriate zoning to accommodate the development of one moderate-income and 12 above moderate-income units. Census Tract 1603, which encompasses the Robertson Road neighborhood, is a Low Resource area. The population within this census tract consists of 84 percent of non-white residents with a median income of $55,461. Approximately 66.7 percent of renter households in the census tract are cost burdened and 18.8 percent of households are overcrowded. The pollution burden for the area is in the 67.7 percentile.

Rouse/Colorado

The Rouse/Colorado neighborhood is located west of Highway 99, east of Carpenter Road, north of Robertson Road and the Tuolumne River, and south of Paradise Avenue. The Rouse Colony subdivision map (which created two, five, and 10 to 30 acre lots) and the Sunset Acres subdivision map (which created one to two acre lots) were both recorded in January of 1911. The neighborhood was further subdivided by the Graham Acres subdivision, recorded in July of 1912, the Southside Tract, recorded in January of 1916, the Modesto Highschool Tract, recorded in March of 1925, the California Homes Tract, recorded in August of 1941, and the Casino Tract, recorded in January of 1947 and is now made up of lots ranging in size between 6,000 square feet and 1.25 acres. The Modesto Municipal Golf Course and John Thurman Field are located just northeast of the neighborhood and the Dryden Park Golf Course is located south of the neighborhood. Marshall Elementary School and James Marshall Park are located on the northwestern edge of the neighborhood. Modesto Highschool is located north of the neighborhood on Paradise Road, within Modesto city limits. The neighborhood is currently served with public water by the City of Modesto, but is lacking sewer, curb, gutter, sidewalk, and storm drain improvements. The Rouse/Colorado neighborhood is one of three neighborhoods included in the West Modesto Sewer Infrastructure Project. As part of the project, a fly line has been completed utilizing CDBG funding. The County is pursuing a State Water Board Grant to fund construction of the remaining project (sewer mainlines, laterals, and on-site connections). ARPA funds have been awarded and are proposed to fund curb, gutter, sidewalk, and storm drainage improvements. This neighborhood is part of the Paradise South Landscape and Lighting District, which maintains streetlights in the neighborhood. The City of Modesto has dedicated funding to make

infrastructure improvements in this neighborhood and has expressed an interest in annexing the area; however, no formal application has been submitted to date.

The Sites Inventory includes 10 vacant sites and 13 non-vacant sites in this neighborhood, which currently have the appropriate zoning to accommodate the development of 77 moderate-income and 63 above moderate-income units. Census Tract 2200, which encompasses the Rouse/Colorado neighborhood, is a R/ECAP and Low Resource area. The population of within this census tract consists of 84 percent of non-white residents with a median income of $44,010. Approximately 61.9 percent of renter households in the census tract are cost burdened and 22.7 percent of households are overcrowded. The pollution burden for the census tract is in the 84.9 percentile.

Spencer/Marshall

The Spencer/Marshall neighborhood is located south of Maze Boulevard, east of the MID Lateral No. 5, north of California Avenue, and west of S Martin Luther King Drive. The neighborhood was originally created by the Spencer Colony subdivision map, which created multiple parcels approximately 10 acres in size. These 10-acre lots were further subdivided into lots half an acre to two acres in size. The Dr. Martin Luther King Jr. Park, which contains the West Modesto King Kennedy Neighborhood Community Center, and Mellis Park are located on the southeast corner of the neighborhood, in the City of Modesto city limits. The Helen White Trail runs north to south from Maze Boulevard to California Avenue to the east of the neighborhood. Franklin Elementary and Preschool are located west of the neighborhood, within Modesto city limits. Central Catholic Highschool, Mark Twain Junior High School, and Mark Twain Park are located just west of the neighborhood within Modesto city limits. The neighborhood has public water and is in the process of getting public sewer. Most of the neighborhood has streetlighting. The neighborhood does not currently have curb, gutter, sidewalk, or storm drain improvements.

The Sites Inventory includes 17 rezone sites in this neighborhood that are non-vacant which will be rezoned from low density residential zones (mix of R-A and R-1) to high-density residential (R-3) to allow for 248 lower-income units, 102 moderate-income units, and 14 above moderate-income units. The lots proposed for rezoning, range in size from 0.8 to 3.5 acres. Census Tract 1601, which encompasses the Spencer/Marshall neighborhood, as well as the east half of Beverly/Waverly neighborhood and the California/Briggs neighborhood is designated as a Census Tract of high segregation and poverty. The population within this census tract consists of 87 percent of non-white residents, with a median income of $48,563. Approximately 63.7 percent of renter households in this Census Tract are cost burdened and 19.7 percent of households are overcrowded. The pollution burden percentile for the census tract is 61.5.

Other West Modesto pockets include the Martin Luther King Drive/California Avenue/Briggs Avenue, Houser Lane, and Vernon Avenue neighborhoods which do not have public water, sewer, curb, gutter, sidewalk, or storm drain improvements.

The Sites Inventory did not include any sites in these West Modesto neighborhoods due to the lack of public water, sewer, curb, gutter, sidewalk, or storm drain improvements.

Other County Neighborhoods (Pockets/Islands)

Other Modesto pockets not included in the Sites Inventory include: Sylvan Avenue/Coffee Road, and Gallo neighborhoods. No county pockets around the City of Riverbank were included in the Sites Inventory which include Northwest Riverbank (Area 38), Cipponeri Road, and Topeka Street/Santa Fe Street (which is receiving ARPA funding). These unincorporated neighborhoods were not included in

the Sites Inventory due to a lack of water and sewer and to a lack of vacant and underutilized parcels in the areas.

Below is a description of the unincorporated County communities located outside of a sphere of influence of a city included in the Sites Inventory, including how they were established, community resources, infrastructure improvements and needs, sites inventory information, and an AFFH data summary:

Crows Landing

The community of Crows Landing is approximately 3.2 square miles in size, located on the west side of Stanislaus County, straddling State Highway 33, between the cities of Newman and Patterson. Crows Landing was established in the 1850s as a ferry landing on the San Joaquin River for gold miners. After the initial gold rush was over, Crows Landing became a river port for steamers hauling agricultural goods produced in the area to market. The entire town moved to its present location adjacent to the railroad tracks, three miles west of its original site, in 1888 due to the arrival of the railroads. The Town of Crows Landing created residential lots, approximately 3,750 square feet in size, and industrial lots along the railroad in 1889. The area was further developed by the Fink's Addition to Crows Landing in 1947, which created additional 7,000 square foot residential lots. Crows Landing is surrounded by agricultural uses and includes Limited-Industrial zoning along the Southern Pacific Railroad tracks, which is developed with agricultural warehouses and packing sheds, adjacent to Highway 33. Approximately one and a half miles to the northwest of the town is the former United States Naval Auxiliary Landing Field, which previously served as a practice landing field for Navy, Marine, and NASA Research aircrafts and is now the site of the Crows Landing Industrial Business Park (CLIBP). Bonita Elementary School is located on the western edge of the community. StanRTA provides bus service from the City of Turlock along Highway 33 to Patterson through the community of Crows Landing and to the City of Newman via bus route number 45. The Crows Landing community lacks curb, gutter, sidewalk, stormwater, street lights, and sewer services. The Crows Landing Community Service District provides municipal water services for residential and commercial purposes via two groundwater wells. The District's ability to expand is extremely limited due to the limitations of its existing water system which has experienced periodic well failures. As part of the County's efforts to develop the CLIBP, a new well will be installed, in proximity to the districts existing two wells, providing an inter-connection between the new well and one of the District's existing wells in an effort to provide mutually beneficial well backup service. This partnership will provide for stabilization of the water system, but not for growth in the District's water capacity.

The Sites Inventory includes five vacant residential sites in this community, on existing vacant residential lots totaling 1.34 acres, that can accommodate five above moderate-income units. No rezone sites or further residential development is proposed in the community of Crows Landing due to its water service limitations and lack of public sewer services. Census Tract 3400, which encompasses the Crows Landing community, is a Low Resource area, with a low risk of displacement, and a pollution burden percentile of 90.4. The median income in this census tract is $50,125, with 74 percent of the population identifying as non-white, 24.7 of renter households that are cost-burdened, and 7.7 percent of households that are overcrowded.

Del Rio

The Community of Del Rio is located north of Ladd Road, east of Carver Road, west of McHenry Avenue, and north of the Stanislaus River. William P. Bell, a golf course designer whose early works included Bel-Air Country Club and Riviera Country Club, designed the original 18-hole golf course in

Del Rio in 1946. The first residential subdivision "Del Rio Estates" was developed in 1947. The first Del Rio Community Plan was adopted by the Stanislaus County Board of Supervisors in 1980. The Plan laid out low-density residential development around the golf course, recreational areas, and agricultural areas surrounding the community. Several other residential subdivisions were subsequently developed around the golf course throughout the 1980s. In 1992 the Del Rio Community Plan was amended to reflect planned residential development. The amended community plan identified existing and planned residential development in Del Rio Community Plan Area I and future growth south of existing development in Del Rio Community Plan Area II. The Del Rio Community Plan was updated again in 1998 to reflect a golf course expansion. However, the Community Plan maintained the residential areas as existing development in Area I and future development, pending a specific plan and EIR, in Area II. The existing residential development is served by public water from the City of Modesto and includes a combination of private septic systems and packaged treatment systems serving individual developments. Older areas of Del Rio were developed with curb and gutter improvements, and newer subdivisions have curb, gutter, sidewalk, streetlights, and storm drainage improvements. The Del Rio Community Plan Area I is almost entirely built out, with the exception of a few areas.

The Sites Inventory includes 57 vacant parcels in Del Rio, all within Area I, totaling 114.35 acres that can accommodate 131 above moderate-income single-family units. The sites are consistent with the densities allowed by Area I of the Community Plan and consist of an approved 24-lot subdivision, "Del Rio Lago," that has not yet been built and an 82-acre parcel identified as "Area I, Subarea 3" allowing for development at a density of one dwelling unit per acre. Census Tract 501, which encompasses the Del Rio Community, is a High Resource area, with a lower risk of displacement, and a pollution burden percentile of 95.1. The median income in this census tract is $95,036, with 74 percent of residents identifying as non-white, 26.5 of renter households that are cost-burdened, and 1.6 percent of households that are overcrowded.

Denair

The Community of Denair is located east of Waring Road, south of Taylor Road, north of Tuolumne Road, and west of the Turlock Irrigation District's Main Canal; Santa Fe Avenue bisects the Community of Denair. The development of Denair, like that of most of the San Joaquin Valley, centered around the availability of irrigation water and the railroad. The Elmwood Colony created 20 to 40 acre lots in the west Denair area, stretching to the western edges of the City of Turlock. John Denair, a division superintendent for the railroad, bought the town site which was later named after him. The Elmdale Post Office was established on June 17, 1898, and in April 1902, John Davis deeded the land to establish the Elmwood School District. The town was renamed Elmwood on July 14, 1904. The Denair Community was further subdivided into one-acre lots in 1909 with the J.D. Subdivision. In 1912, Denair High School was established. The Denair Community Services District, which provides public water and sewer and street lighting services to Denair, was established on October 3, 1961. The Denair Fire Protection Services District was established on October 3, 1961. The first Denair Community Plan was adopted by the Stanislaus County Board of Supervisors in 1987 and the Denair Municipal Advisory Council (MAC) was established in 1992. The older portions of the community lack curb, gutter, sidewalk, and storm drainage improvements; however, these improvement have been installed throughout the community as new subdivisions are developed. The County is in the process of applying for Active Transportation Planning funds, to be leveraged with Measure L funds, to install sidewalks in the neighborhood. The Burlington Northern Santa Fe Railroad runs through the center of

the Community, which includes an Amtrak station. The Community includes an elementary school, middle school, and high school as well as several community parks.

The Sites Inventory includes four rezone sites in this community, on residential lots totaling 12.41 acres, that can accommodate a total of 127 lower-income and 13 moderate-income units. In addition, 20 vacant and underutilized sites have appropriate zoning to accommodate a total of 94 moderate- and above moderate-income units. Census Tract 3604, which encompasses the Denair Community, is a High Resource area, with a low risk of displacement, and a pollution burden percentile of 69.8. The median income in this census tract is $106,726, with 44 percent of residents identifying as non-white, 51.5 percent of renter households that are rent cost-burdened, and 3.5 percent of households that are overcrowded.

Diablo Grande

The community of Diablo Grande is located approximately 10 miles southwest of the City of Patterson and seven miles west of Interstate 5. The community of Diablo Grande exists in the Oak Flat Valley, a non-native grassland and oak savannah, surrounded by named and unnamed peaks of the Diablo Mountain range and bisected by four creeks. The Diablo Grande community was originally approved by the Board of Supervisors as a specific plan in the 1990s, covering 2,300 acres, including construction of approximately 2,000 residential units and two golf courses. The Diablo Grande specific plan has been amended several times including amendments in 1999, 2004, 2005, and 2017. The most recent amendment in 2017 approved an increase in residential density including allowing for a broader range of residential unit types and lot sizes as a means of increasing the number of permitted dwelling units from 2,017 to 2,354. The community is served by the Western Hills Water District for water and sewer services. Curb, gutter, sidewalk, street lighting, and storm drainage improvements have been constructed as the community plan builds out. The community is located in a High Fire Hazard Severity Zone and is served by the West Stanislaus Fire Protection Service for fire protection services.

The Sites Inventory includes 112 vacant sites in this community, a total of 155.31 acres, with appropriate zoning that can accommodate 112 above moderate-income units. Census Tract 06099003300, which encompasses the Diablo Grande Community, is identified by the TCAC maps as a Moderate Resource Area, with a low risk of displacement, with a pollution burden percentile of 96.5 percent. Of the total of 361 households in the census tract, the median income is identified as $81,895 with 73 percent being non-white households, 35.9 percent are rent cost-burdened, and 10.7 percent of households are overcrowded.

East Oakdale

East Oakdale is located east of the City of Oakdale along the Stanislaus River. The community began as a 48,887-acre rancheria, named Rancheria Del Rio Estanislao, that covered the communities of Oakdale and Riverbank. Rancheria Del Rio Estanislao was formally recognized as a land grant and was subdivided into smaller and smaller properties. In the late 1890's larger parcel subdivisions, approximately 10 to 20 acres in size, were recorded in the East Oakdale area and Northern Orange Blossom Colony. The Oakdale Irrigation District is a provider of irrigation water to the agricultural area surrounding the East Oakdale neighborhood and provides domestic water service to the East Oakdale neighborhood. The community does not have a public sewer service and has been developed with private onsite septic systems. Older areas of East Oakdale, created by the Avery Tract in 1912, lack infrastructure improvements and the rest of the East Oakdale community includes a mixture of subdivisions developed with curb, gutter, and streetlight improvements and newer subdivisions,

developed in the 1990s and later, having curb, gutter, sidewalk, streetlights, and storm drainage improvements.

The Sites Inventory includes 51 vacant and underutilized parcels in this community, a total of 148.23 acres, with appropriate zoning that can accommodate 161 above moderate-income units. Census Tracts 101 and 102 encompass the East Oakdale Community. These census tracts are High Resource areas, with a lower risk of displacement, and pollution burden percentiles of 72.3 and 90.8. Median income is $87,692 and $104,010, with 17 and 26 percent of residents identifying as non-white, 26.0 and 27.9 percent of renter households that are cost-burdened, and 1.6 and 2.3 percent of households that are overcrowded.

Grayson

The Community of Grayson is located in the western part of the county, west of the San Joaquin River, east of Highway 33, and north of Grayson Road. The town of Grayson was established in 1849 and was a river port along the San Joaquin River during the gold rush. The town had a boom period in the late 1860's when grain was the biggest cash crop in the area. By the 1880's, Grayson was one of the most active river ports in the county for grain, wool and produce. The community includes the Grayson United Community Park, which includes a Police Activities League office. StanRTA provides bus service between downtown Modesto and the City of Patterson via Bus Route No. 40. The Grayson Community Services District provides public water and sewer to the neighborhood. However, both systems require upgrades prior to any additional development. The community also has intermittent curb, gutter, and sidewalk improvements.

The Sites Inventory includes four vacant sites with appropriate zoning in this community that accommodate a total of six above moderate-income units, on a combined total of 1.41 acres. Census Tract 3300, which encompasses Grayson, is a Moderate Resource area, with a lower risk of displacement, and a pollution burden percentile of 96.5. The population is 87 percent non-white and has a median income of $81,895. Approximately 35.9 percent of renter households are cost burdened and 10.7 of households are overcrowded.

Hickman

The Community of Hickman is located south of the Tuolumne River, a mile and a half south of the City of Waterford. Hickman was an agricultural community, which became a shipping point for grain and hay after the construction of the Southern Pacific Railroad in the late 1800s. The Town of Hickman, created in 1913, developed 3,125 square foot lots centered around the Southern Pacific Railroad, which was later abandoned and the tracks were demolished in the mid to late 20th century. The community of Hickman includes the Hickman Charter School, originally the Rowe School built in 1868, which serves as a homeschool hub for families throughout the Central Valley and Bay Area region. StanRTA provides bus service between the cities of Ceres to the City of Waterford to the community of Hickman via Bus Route No. 50. The community is served with public water by the City of Waterford and lacks curb, gutter, sidewalk, stormwater, and sewer services. The Hickman Municipal Advisory Council was established on May 17, 1994.

The Sites Inventory includes four vacant and underutilized sites with appropriate zoning in this community, which can accommodate a total of 19 above moderate-income units, on a combined total of 6.65 acres. Census Tract 2901, which encompasses Hickman, is a High Resource area, with a lower risk of displacement, and a pollution burden percentile of 75.1. The population is 43 percent non-white and has a median income of $79,474. Approximately 17.7 percent of renter households are cost burdened and 3.1 percent of households are overcrowded.

Keyes

The community of Keyes, is located south of the City of Ceres and north of the City of Turlock, along the Highway 99 Corridor. Highway commercial and truck related uses exist along the community's western edge along highway 99 and along the southwestern edge of the community near the Keyes Road exit off of highway 99. The community first developed around the Central Pacific Railroad with the Map of the Town of Keyes in 1908, which created 3,750 square foot residential lots. The community then expanded post WWII with suburban development with the Warda Tract which created 0.5 acre lots in 1946 and then the Town of Keyes Map and the Texera Tract Map which created 6,000 to 7,000 square foot residential lots in 1947 east of State Highway 99. The Keyes Community Services District, which provides public water, sewer, and street lighting services to the community of Keyes, was established in 1955. The neighborhood also has curb, gutter, storm drainage, and intermittent sidewalk improvements. The Keyes neighborhood is also served by the Keyes Fire Protection Services District which was established in 1960. The first Keyes Community Plan was adopted by the Stanislaus County Board of Supervisors in 1987, and the Keyes Municipal Advisory Council was established in 1991. The neighborhood has curb, gutter, storm drainage and partial sidewalk improvements. StanRTA provides bus service to the community of Keyes on Route 29T, which runs between downtown Modesto, through Keyes, to the City of Turlock. The Keyes Community School District includes a charter school elementary school, and middle school; the community also has multiple community parks.

The Sites Inventory includes three rezone sites can accommodate a total of 58 lower-income units and 20 moderate- and above moderate-income units, on a combined total of 4.45 acres, and 11 vacant and underutilized sites with appropriate zoning in this community, which can accommodate a total of 20 moderate-income and 16 above moderate-income units, on a combined total of 5.05 acres. Census Tract 3002, which encompasses Keyes, is a High Resource area, with a lower risk of displacement, and a pollution burden percentile of 78.7. The population is 75 percent non-white and has a median income of $56,579. Approximately 40.0 percent of renter households are cost burdened and 7.7 percent of households are overcrowded.

Salida

The Community of Salida is located north of Modesto along Highway 99, south of the Stanislaus River. The original settlement was called Murphy's Ferry and operated as a ferry crossing along the Stanislaus River during the gold rush. In 1875, the community was granted a post office, but a new name had to be chosen because there already was a Murphy's post office in Calaveras County. A Spanish word, "Salida", was chosen and this implied that the new town was "near the water," being the closest town to the south bank of the Stanislaus River. The map of the Town of Salida developed 4,800 square foot residential lots in 1908 and the Kewin Plat created additional residential lots in 1909 centered around the railroad in Salida, which now lies on the west side of Highway 99. Additional low-density residential subdivisions developed on the west side of Salida in the late 1930s and 40s and on both the east and west sides of Highway 99 in the 1980s through the early 2000s. The Salida Fire Protection District was established in 1955 and the Salida Sanitary District in 1957. The first Salida Community Plan was adopted by the Stanislaus County Board of Supervisors in 1987, and the Salida Municipal Advisory Council was established in 1984. The Salida Unified School District includes four elementary schools and one middle school. Salida also includes two private TK-8 schools and Gregori High School, which is in the Modesto City School District. The Salida community also includes a number of community parks and a County-maintained Library. StanRTA provides bus services via Route 48 between downtown Modesto and the community of Salida. The Stanislaus County Board of

Supervisors passed an ordinance on August 7, 2007, to implement the Salida Area Planning "Roadway Improvement, Economic Development and Salida Area Farmland Protection and Planning Initiative," also known as the "Salida Initiative," which amended the Salida Community Plan (SCP). The amended SCP provides land use planning and guidance for development of approximately 4,600 acres of land in the Salida area. SCP encompasses the existing community of Salida, which was part of the previously approved SCP (Existing Plan Area), and an amendment area encompassing approximately 3,383 acres (Amendment Area). The SCP was adopted by the Board of Supervisors without environmental review, which was allowed at the time for initiatives. Environmental review is required for buildout of the SCP.

The Sites Inventory includes three rezone sites, located in the existing Salida Community Plan area, 1.4 acres total, which propose to rezone property from General Commercial (C-2) to Mixed Use (MU) to accommodate a total of 21 moderate- and above moderate-income units. In addition, two sites, 0.60 acres total, have appropriate zoning in this community, which can accommodate a total of five moderate-income and two above moderate-income units. Census Tracts 501 and 510 encompass the Salida Community. These census tracts are Moderate and High Resource areas, with a lower risk of displacement, and pollution burden percentiles of 77.8. Median incomes are $62,253 and $95,036, with 33 and 73 percent of residents identifying as non-white, 26.5 and 54.3 percent of renter households that are cost-burdened, and 1.6 and 4.4 percent of households that are overcrowded.

Valley Home

The community of Valley Home is located in the eastern portion of the County, north of Highway 120 and the City of Oakdale, east of the San Joaquin County line, and west of Valley Home Road and Woodward Reservoir. Valley Home was once the shipping point for north-eastern part of the county. Originally called Clyde, then Thalheim, and now Valley Home (English translation of the German "Thalheim"), the community of Valley Home was created in 1904 by the Map of Thalheim, which created a 14-acre township made up of 2,800 square foot lots. The area had previously been a large wheat ranch that was taken over by a banking company through foreclosure of a mortgage. In order to recuperate its losses, the company took advantage of the irrigation plan, in which water was provided by the Tulloch Ditch Company. The land was sold to a real estate company, divided into small ranches, and sold by newspaper advertising to German families in the Middle West. The community has an elementary school and a middle school. Residential development in the community of Valley Home utilizes private wells and septic systems and does not have curb, gutter, sidewalk, or storm drainage improvements.

The Sites Inventory includes four vacant sites totaling 0.61 acres with appropriate zoning to accommodate four above moderate-income units. Census Tract 101, which includes Valley Home, Knights Ferry (not in the Sites Inventory), and the northeastern portions of East Oakdale, is described above (in the East Oakdale Community description)

Other County Communities

County communities not included in the sites inventory include: the communities of Knights Ferry and La Grange, both historic mining communities located on the east side of the County along the Stanislaus and Tuolumne Rivers; the community of Westley which is located west of the Community of Grayson and Highway 33 and east of Interstate 5, on the westside of the County; and the Monterey Park and Cowan Tracts, which are rural residential subdivisions, located south of the City of Ceres, surrounded by agricultural uses. None of these communities are near services or transit routes and lack the infrastructure needed for residential development.

Sites Inventory Discussion

The unincorporated areas of East Oakdale, Knights Ferry, Valley Home, and Hickman are all viable communities for development, but development in these areas is challenged by either the lack of available land or lack of infrastructure making the feasibility for any development beyond the capacity afforded under the existing zoning infeasible. The remote nature of these communities affords residents limited job opportunities, limited transit opportunities, and basic service support hubs, and in some cases basic services (such as grocery stores, pharmacies, and auto repair facilities), making them less suitable for high-density housing development. Furthermore, development in these areas would require the conversion of agricultural land, which is the backbone of the county's economy.

Rezone sites have been identified in the Moderate Resource areas of Denair and Keyes where existing non-agriculturally zoned lands with available access to public water and sewer exist. The Sites Inventory proposes the greatest number of lower-income units in Bret Harte (481 lower-income units), West Modesto (248 lower-income units), and Denair (127 lower-income units). Denair, with a community plan footprint of 1,013 acres, has been assigned 12 percent of the lower-income units, the third highest assignment. Additional growth in both the communities of Denair and Keyes, within adopted community plan areas, are constrained by the 2008 passage of Measure E (discussed in Section 3.15, *Other Relevant Factors*) which requires a vote of the public to allow residential development. While the residential areas within these community plan areas were adopted prior to the passage of Measure E, the County's General Plan and zoning districts had not been amended, with the expectation that those amendments would come with the future review once development plans for these areas are produced. Development within Salida and Del Rio is restricted by the lack of environmental review being conducted for the Amendment Areas of the Community, which includes a lack of identified infrastructure to serve these areas. However, the County recently entered into an agreement with an environmental consulting firm to complete a Programmatic EIR for the amendment area of the Salida Community Plan, inclusive of development of infrastructure planning and a fee program (Housing Plan Action 2-1g).

No displacement of existing residents is foreseen as part of the proposed rezoning and, while these areas may be considered to be Low Resource areas today, the County is actively working to improve access to opportunities in these areas. The introduction of well-planned and well-designed residential opportunities will aid in addressing the communities' need for a broader range of affordable housing opportunities.

3.16.5 Racially and Ethnically Concentrated Areas of Poverty and Racially Concentrated Areas of Affluence

As noted in Section 3.9.1, there are four census tracts listed as racially concentrated areas of poverty, or R/ECAPs, in Stanislaus County, three of which overlap with CDPs located in unincorporated Stanislaus County, including Airport, West Modesto (Rouse/Colorado), and Bret Harte/South Modesto. A fourth R/ECAP area is identified in the City of Ceres; however, this R/ECAP is located entirely within Ceres' city limits and does not fall under the jurisdiction of the County. These CDPs are also located in areas with predominantly Hispanic/Latino residents and elevated rates of poverty. Feasible sites were found in Airport, Rouse/Colorado (West Modesto), and Bret Harte/South Modesto. Out of the total 2,434 units identified for the County's RHNA, 27.1 percent of the sites identified are located in a R/ECAP, making up 40.3 percent of the County's lower-income RHNA units identified, 24.2 percent of the moderate-income units identified, and 10.6 percent of the above

moderate-income units identified. The number of units within each of these CDPs by income group is:

- Airport: 15 moderate-income and 7 above-moderate income units
- Bret Harte/South Modesto: 445 lower-income, 41 moderate-income, and 13 above moderate-income housing units
- West Modesto (Rouse/Colorado): 77 moderate-income and 63 above moderate-income units

Within Bret Harte/South Modesto, the largest opportunity for the development of affordable housing units is in the vicinity of Fairview Park where five parcels encompassing a total of approximately 24 acres have a combined capacity of 486 dwelling units. Of these units, 445 are allocated to the lower income RHNA. These five sites are well located with sewer and water infrastructure available through existing connections to the City of Modesto and access to two elementary schools (Bret Harte and Fairview Elementary) within less than a mile.

Stanislaus Transportation Authority's Route 42 bus links the Fairview Park neighborhood to services and job centers in Modesto and Ceres, the sites are directly adjacent to neighborhood commercial with more the more extensive Crows Landing Road commercial corridor approximately one mile away. These sites are also directly adjacent to the recently refurbished Fairview Park, providing high-quality recreational facilities close to residents.

In contrast, the CDPs of East Oakdale, Orange Blossom, Knights Ferry, Valley Home, Denair are considered racially concentrated areas of affluence, or RCAAs. These are areas of Stanislaus County where predominately non-Hispanic white population and generally higher median incomes are located. Sites feasible to accommodate different income levels are in East Oakdale, Valley Home, and Denair. Out of the total 2,434 units identified for the County's RHNA, 17.4 percent of the sites identified are located in a RCAA, making up 11.5 percent of the County's lower-income RHNA units identified, 7.1 percent of the moderate-income units identified, and 33 percent of the above moderate-income units identified. These CDPs have the following number of units per income category:

- East Oakdale: 161 above moderate-income housing units
- Valley Home: 4 above moderate-income housing units
- Denair: 127 lower-income, 39 moderate-income, and 68 above moderate-income housing units

While there are sites suitable for the development of lower-income housing units in Denair, no sites suitable for affordable housing were identified in Valley Home, East Oakdale, or Del Rio. As discussed in Chapter 5, *Housing Resources*, these areas are infrastructure constrained as there is no municipal sewer service available. All housing units built in these areas would utilize individual septic or onsite package treatment systems to handle wastewater, and, per state law regarding the site inventory, sites that can accommodate lower-income units must have access to public sewer and water service; East Oakdale and Valley Home have no lower-income units despite those neighborhoods being High Resource areas, because lower-income development cannot be assumed on sites in those areas due to infrastructure constraints.

The County conducted additional outreach efforts in April and May 2025 to expand community understanding of the updated Consolidated Plan, Housing Element Update, and sites proposed for rezoning in the Sites Inventory. The County attended two meetings for South Modesto residents, which includes the R/ECAP area of Bret Harte, a farmers market held in the Airport neighborhood, which is a R/ECAP area, and two meetings in West Modesto, including a West Modesto Collaborative meeting and meeting organized by CRLA in the Rouse/Colorado neighborhood, which is a R/ECAP

area. During these meetings, input received indicated a need for rental and utility assistance, homeless housing assistance, home repair assistance, tenant/landlord counseling programs, fair housing assistance, specifically with the eviction process and with rent increases, assistance with homeowner insurance, the need for infrastructure improvements to roads, parks, and street lighting, and the need animal services to address loose dogs. General questions and concerns regarding the installation of sewer in the Rouse/Colorado neighborhood and whether the improvements would lead to traffic, noise, dust impacts during construction, increased property taxes or bills, or annexation were received. Comments also indicated a need for stronger code enforcement policies/improved inspections to ensure rental units are maintained properly and safe to live in. Concerns regarding rent stabilization policies and high costs associated with improvements of rental units were voiced and inquiries regarding the development and funding assistance for accessory dwelling units were made. Staff will present on implementation of the housing element and proposed rezones to the Denair MAC on August 5th.

Programs and actions addressing these comments have been incorporated into Chapter 6, *Housing Plan*, including: Program 1-1 which focuses on rehab assistance, Program 1-2 which includes an Action that enforces the inspection of complaints about habitability issues in rental units, Program 2-3 which aims to increase access to Housing Choice Vouchers, and Program 2-4 which supports homeownership opportunities, which all include targeted outreach to the R/ECAP communities of Airport, Bret Harte, and Rouse/Colorado; Program 3-8 which promotes the development of accessory dwelling units (ADUs), including Actions 3-8f and 3-8g which incentivize and offer funding for the production of ADUs, with focused outreach in RCAAs; Program 3-9 which invests in infrastructure improvements in existing neighborhoods, with a focus on Low Resource and R/ECAP areas; Program 4-3 which supports homeless housing; Program 5-1 which includes actions aimed at increasing economic development to aid in housing mobility, with a focus on R/ECAP and Low Resource communities, and non-motorized transportation access in R/ECAP areas; Program 5-2 which includes multiple actions aimed at providing fair housing education, including the availability of rental and utility assistance programs, fair housing investigation services, and tenant landlord counseling; and Program 5-3 which includes actions that will prevent displacement, improve existing communities through parks and roads improvement projects in communities with high displacement risk, including the R/ECAP areas of Bret Harte and Rouse/Colorado.

3.16.6 Access to Opportunity

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

3.16.7 Disproportionate Housing Needs

The highest percentage of both cost-burdened households are located in the South Modesto CDPs, as seen in Figure 3-46. Similarly, as shown in Figure 3-50, an elevated percentage of overcrowded households exists within the South Modesto CDPs. The combination of the two CDPs in Bret Harte (South Modesto) and West Modesto results in an estimated capacity of 729 lower-income, 317

moderate-income, and 138 above moderate-income housing units to be built. Providing more affordable housing opportunities in these areas may lower levels of cost burden in these CDPs.

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

3.16.8 Subsidized Housing

As discussed in Section 3.10 Location of Affordable Housing, Stanislaus County has a range of publicly assisted rental housing affordable to lower and moderate-income households within its incorporated cities, and none in unincorporated communities. Overall, there is a concentration of HCV recipients or subsidized housing projects in the South Modesto CDPs, as seen in Figure 3-60. Sites identified as adequate for lower-income housing are located in the South Modesto CDPs where HCV recipients represent between 1.9 and 17.1 percent of renter-occupied housing units. The development of lower-income housing units on the sites identified in the Sites Inventory do not create an unusually high concentration of lower-income units near existing affordable housing projects or in neighborhoods with high concentrations of Housing Choice Voucher recipients.

3.17 Identification and Prioritization of Contributing Factors

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

High Priority

- **Need for Additional Public and Private Investments in Specific Neighborhoods.** The range of resource scores for unincorporated communities is wide ranging, according to the TCAC opportunity maps. Especially where inventory sites to accommodate lower-income housing are located, the County will take actions under the following program to promote equitable investments (and public investments that can spur private investments) in unincorporated communities:
  - Program 1-1: Home Rehabilitation Program
  - Program 2-4: Support Homeownership Opportunities
  - Program 3-9: Infrastructure
  - Program 5-3: Displacement Prevention, Place-Based Strategies, and Housing Mobility
- **Low Supply of Affordable Housing.** This analysis, alongside input from community feedback, identified there not being enough affordable housing units throughout the County to accommodate households in need. Lower-income households are not able to secure affordable housing even with the assistance of HCVs due to low supply. In addition, lower-income

households are disproportionately affected by housing problems, including overpayment, compared to moderate- and above moderate-income households, indicating they are in need of more affordable housing options. The following programs will address low affordable housing supply:

- Program 1-1: Home Rehabilitation Program
- Program 2-1: Affordable Housing Development Assistance
- Program 2-2: Density Bonus
- Program 3-4: By-Right Approval for Projects with 20 Percent Affordable Units
- Program 3-9: Infrastructure

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

Moderate Priority

- **Special Needs Housing.** The unincorporated County has a slightly disproportionately larger senior and disabled population than the incorporated cities. Due to the special needs of these populations, the County will take actions to enhance housing opportunities for seniors, persons with disabilities, and female-headed households:
  - Program 3-6: Zoning for a Variety of Housing Types
  - Program 4-1: Housing for Special Needs Populations

- **Housing for Persons Experiencing Homelessness.** There is a shortage of housing for persons experiencing homelessness, and programs that will facilitate temporary, transitional, supportive, and permanent housing for persons experiencing homelessness include:
  - Program 3-6: Zoning for a Variety of Housing Types
  - Program 4-1: Housing for Special Needs Populations
  - Program 4-3: Homelessness

- **Fair Housing Resources.** Community members and stakeholders reported that increased access to fair housing information is necessary. The following programs will address this issue:
  - Program 5-1: Affirmatively Furthering Fair Housing and Environmental Justice
  - Program 5-2: Fair Housing Services

- **Access to Transit.** The AFFH Data Viewer identified that high-quality transit stops are primarily located within incorporated cities and that unincorporated communities, including those adjacent to cities, do not have any high-quality transit stops. Community feedback supported these findings, with community members expressing that public transit is unreliable in unincorporated communities. Affordable housing in proximity to transit was expressed as a

priority to community members. Programs that site affordable housing near opportunity areas include:

- Program 3-9: Infrastructure

Low Priority

- **NIMBYism and Public Perception of Housing Development.** Public opposition to housing development in some unincorporated communities can be strong. The County will establish public outreach campaigns to reduce opposition to housing development generally through the following programs:
  - Program 4-4: Community Outreach and Education
- **Access to Financial Services.** Residents of unincorporated Stanislaus County struggle to secure financing for home ownership, particularly nonwhite residents. The following programs will help to increase access to financial resources:
  - Program 2-4: Support Homeownership Opportunities
- **Displacement.** Residents in the Bret Harte (South Modesto), North Ceres, Empire, and Crows Landing areas are particularly susceptible to displacement, with Bret Harte (South Modesto) CDP facing the most displacement pressure. The following programs will address displacement risk:
  - Program 3-3: Replacement Housing
  - Program 5-3: Displacement Prevention, Place-Based Strategies, and Housing Mobility

There are a few key overarching, meaningful outcomes with metrics that can be used to measure progress and effectiveness of the overall effort and combined impact of programs to improve fair housing results. Table 3-21 defines overarching outcomes and metrics for all the Fair Housing Strategies. Outcomes focus on ensuring lower-income households have housing mobility, including in High Resource areas; preventing displacement for vulnerable households; and improving neighborhood conditions in low-opportunity areas.

Table 3-21 AFFH Programs by Category

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
Fair Housing Outreach and Enforcement	Action 2-3b: Ensure potential and existing tenants and landlords or property managers are informed of the California Fair Employment and Housing Act (FEHA) prohibiting housing discrimination based on source of income (including housing choice vouchers). Provide tenant/landlord counseling services and conduct ongoing outreach to inform tenants of their fair housing rights.	Require any County-contracted fair housing providers to disseminate information about FEHA by December 2025. Provide tenant/landlord counseling services upon request. Work with fair housing providers and community partners to conduct outreach to tenants regarding their fair housing rights at least twice per year.	December 2025
	Action 2-3c: Partner with the Stanislaus Regional Housing Authority (SRHA) to increase landlord participation in HCV programs by conducting landlord education and outreach on the	Partner with SRHA to make HCV program fact sheet available at County offices serving the general public and on the County's website by January 2026. Provide fact sheets to property owners seeking building	January 2026

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	program and source of income discrimination.	permits for Accessory Dwelling Units (ADUs). Focus outreach in Higher Resource areas, such as Salida, East Oakdale, and Hickman.	
	Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.	Review policies and procedures for community development and housing assistance programs	By December 2026 and make necessary changes within six months.
	Action 5-1g: Offer training to County staff on a variety of topics included in the County's Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)	Beginning 2025, offer training sessions annually during the planning period.	Annually
	Action 5-2a: Coordinate with qualified organizations to provide fair housing and tenant/landlord services, including housing counseling and education and tenant/landlord counseling and mediation. Provide written information and workshops in multiple languages. Ensure outreach to identified Disadvantaged Communities, specifically Cowan Tract, Crows Landing, Grayson, Keyes, Monterey Park Tract, Riverdale Park Tract, and Westley[31]. (Environmental Justice)	Maintain fair housing provider contract and aim to provide at least 90 percent of services in Disadvantaged Communities.	Ongoing
	Action 5-2b: Through a fair housing provider, provide information and referral services that direct families and individuals to financial resources for housing rental or purchase, locating suitable housing, and obtaining housing with special needs facilities such as accessible units.	Hold at least eight informational events during the planning period to disseminate informational materials or provide trainings to residents, at least once every two years in communities sensitive to displacement (see Chapter 3, Affirmatively Furthering Fair Housing, Section 3.7.3).	Ongoing
	Action 5-2c: Provide training opportunities for property owners and managers about the requirements of federal, state, and	Partnering with a fair housing provider, hold two training sessions annually.	Annually

[31] Stanislaus County Disadvantaged Unincorporated Communities Report. https://www.stancounty.com/planning/pl/documents/gp/i-d-stanislaus-county-disadvantaged-unin-communities-report.pdf

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	local laws related to real estate, housing discrimination, tenant protection, and housing inspection. Work cooperatively with the real estate industry to develop ways for agents and property managers to become more familiar with County housing and rental and utility assistance programs. Encourage realtors to seek fair housing training.		
	Action 5-2d: Require contracted fair housing provider to conduct random fair housing testing at least annually.	Annual testing.	Annual
	Action 5-2e: Disseminate fair housing information via targeted social media efforts.	Add more information about fair housing agencies and services on the County's webpage and social media.	December 2025
Housing Mobility	Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities	Seek funding as applicable Notices of Funding Availability (NOFA) become available	Annually
	Action 2-2a: Update the Density Bonus Ordinance to bring it into compliance with State law and remove the requirement for Planning Commission approval of Density Bonus applications.	Adopt updated Density Bonus Ordinance	December 2025
	Action 2-2b: As part of Density Bonus Ordinance update, discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond State law is appropriate for the County. This is specific to projects that already meet the State required percentage of affordable units at the time of application.	Meet with four qualified housing developers, prior to updating the Density Bonus Ordinance.	December 2025
	Action 2-2e: Adopt a local density bonus ordinance that exceeds state minimums. Provisions may include higher bonuses (e.g., up to 100 percent for 100 percent affordable projects), additional incentives (e.g., reduced parking, height and setback waivers), or incentives for diversifying affordability and/or family-sized units.	Adopt enhanced density bonus ordinance. Facilitate the approval of two projects under enhanced provisions during the planning period.	December 2026
	Action 2-3a: Refer HCV holders to a list of properties compiled by SRHA that are actively participating in the Housing Choice Voucher Program.	Provide a link to the SRHA "For Rent" directory on the County's website	December 2025

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	Action 2-3d: Provide support to SRHA as necessary to seek additional funding that can be used, in addition to HCV funds, to provide subsidies to lower-income households to bring monthly rents in line with affordability guidelines, or help with moving costs, security deposits, or application fees.	Meet with SRHA to identify funding needs and opportunities. Aim to assist 15 households annually.	Meetings by June 2026; annual funding
	Action 2-4a: Continue to identify and pursue federal, state, and regional programs to move very low-, low-, and moderate-income families from renters to homeowners, such as HUD's Homeownership Voucher Program, down payment and closing cost assistance, mortgage financing, and mortgage credit certificates for homebuyers.	Annually identify potential funding sources and, where eligible, pursue funding either directly or by supporting other agencies in their efforts to secure funding. Work with partner agencies to establish an information network connecting potential homeowners to funding sources. Focus outreach to areas at high risk of displacement, and Lower Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport).	ANnually
	Action 2-4b: Partner with local nonprofit agencies to provide pre-purchase home buying counseling for residents to provide information on mortgage readiness, fair housing education, budgeting for a mortgage payment, credit education, money management, and identifying and avoiding predatory lending.	Provide homebuying counseling to at least 20 residents annually. Coordinate with at least one non-profit organization or employment-related organization, such as teachers' associations, school districts, and community-based service providers, to increase awareness of, and access to, housing resources and financial planning services. Focus outreach to areas at high risk of displacement, and Lower Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport).	Counseling provided on an ongoing basis
	Action 3-1d: The County has identified four parcels of County-owned land for the development of affordable housing: one in Empire (APN 133-017-006) and three in Keyes (APNs 045-065-044, 045-064-057, and 045-064-058). The County will comply with the Surplus Land Act in the disposition of all publicly owned land including those four parcels in the site inventory. Once agreements are in place for development and disposition of those properties, the County will prioritize entitlement processing and building permit issuance, and if appropriate, commit funding. Consistent with Program 3-2 (No Net Loss Zoning), the County will monitor all sites in the inventory	Development and disposition of publicly owned inventory sites: The County expects to enter into a development and disposition agreement for the site in Empire (APN 133-017-006) by the end of 2025. The County will begin the development and disposition process for the Keyes site (APN 045-065-044, 045-064-057, and 045-064-058) in January 2026. Both sites are expected to yield 22 units of affordable housing.	Disposition and development by the end of 2026

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	and if development is not occurring in line with assumptions sufficient to keep on track to meet the share of the RHNA, the County will identify alternative sites.		
	Action 3-1e: Amend Zoning Ordinance to prohibit development of single-family dwellings in multi-family zones or land use designations.	Adopt Zoning Ordinance amendment	December 2025
Anti-Displacement	Action 5-1e: Modify funding policies, if necessary, to allow the use of r eligible State and/or Federal funding to repair failing septic systems.	Modify funding policies	June 2025
	Action 2-1i: Provide technical assistance to prospective developers interested in developing housing for extremely low-income (ELI) households. Defer Public Facility Fees for housing developments providing ELI housing. Develop and advocate for an update to RFP scoring criteria to prioritize technical assistance for affordable housing developments providing 50 percent or more ELI housing units.	Hold at least two meetings for developers interested in affordable housing for ELI households to provide technical assistance. Hold meetings in and regarding neighborhoods with higher concentrations of ELI households (i.e., Rouse/Colorado, Bret Harte, and Airport). Defer the PFF fees for two housing developments providing 50 percent or more ELI units. Recommend a scoring preference for ELI priority to the Community Development Committee by 2026.	2026
	Action 1-1a: Provide housing rehabilitation assistance for owner-occupied households, including mobile homes, with a focus on vulnerable and lower-income households including seniors on fixed incomes and persons with disabilities. (Environmental Justice)	Provide grants and/or loans for home repairs of at least four owner-occupied housing units per year for a total of 32 lower-income housing units during the planning period. Focus on neighborhoods with higher concentrations of units in need of rehabilitation (i.e., Airport, Empire, North Ceres, South Ceres, Turlock, areas of West Modesto, Crows Landing, Denair, Grayson, Hickman, Salida, and Valley Home).	Annual marketing efforts and funding allocations
	Action 2-1h: Modify, as needed, the Public Facilities Fee waivers or deferrals to apply to farmworker housing occupied by moderate income farmworkers (between 80 and 120 percent of AMI).	Work with consultant to develop and present modifications to the Public Facilities Fees Committee by February 2026. Recommended amendments will go to the Board of Supervisors for consideration.	February 2026
	Action 2-5a: Conduct a feasibility analysis of establishing or joining a local Housing Trust Fund. Study should include analysis of available resources, potential for impact, prioritization of use of funds (i.e.,	Complete feasibility analysis by December 2025. Depending on results of analysis, establish a trust fund or partner with an existing trust fund by December 2026. In developing the program policies, advocate for the inclusion of a scoring	Feasibility analysis by 2025; if feasible, establish trust fund by December 2026

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	income targeting, rental vs. ownership projects).	system that includes a bonus for projects in Lower Resource areas. Aim to have the County's funding assist at least eight lower-income households through the creation, rehabilitation, and/or preservation of units in the unincorporated area annually.	
	Action 3-6a: Amend Zoning Ordinance standards to allow for housing options that provide greater flexibility and affordability in the housing stock. This may include allowing shelters, transitional housing, and tiny homes with wraparound services on land owned by faith-based organizations, social services agencies, and nonprofits that do this work in the community and on publicly owned land.	Conduct stakeholder meetings by December 2025 to identify options and, if viable options are identified, amend Zoning Ordinance by December 2026. Connect organizations seeking to develop affordable housing to development resources, such as community development organizations, non-profit developers, and free pre-development meetings. Aim to conduct at least two pre-development meetings for potential projects annually and to facilitate the development of at least 12 units by the end of the planning period.	Zoning Ordinance amendment by December 2026
	Action 3-6h: The County will promote other types of alternative housing options including single-room occupancy developments or conversions, group homes, and permanent supportive housing.	At least once a year, the County will meet with developers and service providers to promote other types of alternative housing with a focus on increasing awareness of housing options and providing technical assistance.	Annually
	Action 3-7f: Develop objective design standards for housing development that will help the County meet RHNA obligations, including, but not limited to, multi-family housing, ADUs, SROs, duplexes, and triplexes, while providing a streamlined permitting process.	Adopt objective standards	December 2025
	Action 3-8b: Work with organizations, such as community development corporations, to identify gap funding for lower-income homeowners to build ADUs, or to develop or preserve ADUs for income-qualified tenants.	Complete feasibility analysis	December 2025
	Action 3-8c: Partner with an organization involved in affordable housing or community development activities to provide informational workshops to property owners about the ADU permitting and building process. Target outreach to property owners in Low and	Facilitate one workshop annually with the objective of facilitating at least 45 ADUs in Low and Moderate Resource areas.	Annually

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	Moderate Resource areas and provide workshops and materials appropriate for residents with limited English proficiency.		
	Action 3-8g: Incentivize the creation and affordability of ADUs by utilizing PLHA and partnering with a local lending institution or Community Development Financial Institution (CDFI) to develop an ADU financing assistance program for Urban County cities. Current PLHA funding allows for a maximum of seven loans between all partner jurisdictions.	Develop new incentives to promote affordable ADU development and aim to assist at least two ADUs in unincorporated Stanislaus County during the planning period and maintain them as affordable to lower-income households.	December 2028
	Action 4-1a: Establish a scoring criterion for affordable housing projects that encourage the inclusion of units and services needed to support individuals with special needs.	Amend funding policies to establish criteria that encourage special needs housing	June 2026
	Action 4-1b: Adopt policies and procedures for the integration of universal design features, including those needed for persons with disabilities and their caregivers, in housing rehabilitation and housing development projects, to the extent that funding allows.	Develop guidelines or standards	December 2025
	Action 4-1c: Review the Reasonable Accommodations Ordinance and amend if needed.	Amend Zoning Ordinance, if needed.	December 2025
	Action 4-1d: Continue to coordinate the housing efforts of the County's Planning Department, Community Services Agency, and Behavioral Health and Recovery Services to maximize leveraging of existing funding for special needs housing and services, and to build staffing capacity.	Meet regularly with County departments and regional agencies throughout the planning period.	Ongoing
	Action 4-1e: Amend Zoning Ordinance to remove references to "nonprofit" in the definition of "family"	Amend Zoning Ordinance	December 2025
	Action 4-1a: Establish a scoring criterion for affordable housing projects that encourage the inclusion of units and services needed to support individuals with special needs.	Amend funding policies to establish criteria that encourage special needs housing	June 2026

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
New Housing Choices in High Opportunity Areas	Action 2-1a: Actively promote sites to qualified housing developers for affordable housing development opportunities through Requests for Proposals (RFPs) with emphasis on promoting housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, multi-generational households, low-income, and/or persons with disabilities.	Release an RFP and by the end of the planning period release four RFPs for available sites for affordable housing and provide information on housing incentives and programs to support the entitlement of at least 250 housing units affordable to extremely low-, very low-, and low-income households in the County during the planning period. Focus efforts in neighborhoods with higher concentrations of special needs populations (i.e., Rouse/Colorado, Bret Harte, and Airport), with at least 75-125 affordable units targeted in High Resource and/or above moderate-income areas.	December 2025
	Action 2-1b: Monitor availability of state and federal funding and support developers with their applications for incentives and funding programs that provide financial assistance to develop affordable housing for special needs populations.	Annually, review proposed development budgets and schedules for at least one County-funded affordable housing project (consistent with Action 2-1a) to identify the need for County support with funding applications. Upon request, provide technical assistance for non-County-funded affordable housing development projects.	Annually
	Action 2-1c: Assist developers, faith-based and nonprofit organizations, or other qualified private sector interests with the application and development of projects. Allocate resources in the form of a dedicated County staff member to assist with entitlements, site identification, public facility fee waivers, and density bonuses. Develop an informational packet and conduct outreach to religious/faith-based institutions in high- and highest-opportunity areas in the county to educate them about recent changes in State law (e.g., the Affordable Housing on Fair Lands Act [SB 4]). The County will also connect interested landowners with experienced nonprofit affordable housing developers, provide technical assistance to identify opportunities for funding, reducing permit fees, and reducing development standards.	Assist in supporting the development of at least 250 subsidized very low- and low-income income units over the planning period. Subject to funding availability, provide development subsidy for at least three affordable housing developments by December 2029. Prioritize subsidies for financing for rental housing units affordable to lower-income households and households with special needs, and projects in moderate- or above-moderate resource areas. Focus efforts in neighborhoods with higher concentrations of special needs populations and lower-income residents (i.e., Rouse/Colorado, Bret Harte, and Airport), with at least 75 to 125 affordable units targeted in high-resource and/or above moderate-income areas. County staff member to assist as needed on an ongoing basis. Create and disseminate informational packet by December 2026 and conduct outreach to religious/faith-based institutions biennially, specifically	Provide subsidy for three developments by December 2029 Create informational packet by December 2026

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
		pertaining to SB 4. Provide technical assistance on a project-by-project basis.	
	Action 2-1g: As authorized by the Board of Supervisors, complete the necessary environmental review needed to allow for housing development within the Salida Community Plan.	Conduct the environmental review and complete environmental review within three years of Board of Supervisors authorization.	Within the planning period
	Action 3-1h Amend the Zoning Ordinance to remove the 6,000 square foot minimum lot size and 65-foot-wide lot width requirements in R-3 zones to allow housing to be developed at a higher density. Remove the minimum lot and depth requirements in R-A zones and amend the R-2 ordinance to allow for additional housing types	Adopt Zoning Ordinance amendment.	December 2025
	Action 3-1i: Amend the Zoning Ordinance to allow for increased residential development on irregular and smaller lots in existing communities, including: reducing the minimum lot size required for residential development in the R-1, R-2, and R-3 zoning districts; increasing lot coverage maximums in the R-1, R-2, and R-3 zoning districts; and allowing for the development of up to 14 dwelling units per acre ministerially in the R-2 zoning district.	Adopt Zoning Ordinance amendment.	December 2025
	Action 3-1j Support a variety of housing types in Racially Concentrated Areas of Affluence (RCAAs) through encouraging ADU production and the maintenance of existing units through implementation of the County's rehabilitation program (Program 1-1).	Develop 35 ADUs in RCAAs throughout planning period; target use of rehabilitation funding in RCAA area by June 2026.	June 2026
	Action 3-6b: Review all residential zoning districts and land use designations for additional development in low-density neighborhoods. Amend the Zoning Ordinance to allow, by-right or via streamlined review process, a mix of dwelling types and sizes, specifically "missing middle" housing types (e.g., duplexes,	Aim to facilitate at least 12 missing middle-type units in low-density residential areas per year of the planning period. Focus efforts in lower-density residential areas, High Resource and RCAA areas, (i.e., Salida, East Oakdale, Denair, and Hickman).	Complete review by December 2025 and amend Zoning Ordinance by December 2026

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	detached ADUs, courtyard buildings).		
	Action 3-8a: Conduct a marketing campaign to disseminate existing ADU planning tools, including the County's ADU information website, interactive permit guides, ADU email list, and pre-approved ADU plans.	Advertise the County's ADU planning tools on social media on a biannual basis. Facilitate the development of 184 ADUs over the planning period. Focus outreach efforts in High Resource and Racially Concentrated Areas of Affluence (i.e., Salida, East Oakdale, Denair, and Hickman).	Biannually
	Action 3-8d: Through public-facing materials and outreach activities, promote the development of ADUs in High Resource areas and Racially Concentrated Areas of Affluence, like Salida, East Oakdale, and Hickman.	Facilitate the development of at least 45 ADUs in Higher Resource and higher-income areas.	Ongoing – by the end of the planning period (2031)
	Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of "Outstanding" and may exclude those with a rating of "Needs to Improve" or "Substantial Noncompliance" according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC).	Review an individual institution's most recent Home Mortgage Disclosure Act (HMDA) reporting as most recently published by the Federal Financial Institutions Examination Council (FFIEC).	Ongoing – Annually
	Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6th Cycle Housing Element planning period.	Apply for Prohousing designation	June 2025
Place-Based Strategies for Community Improvement	Action 5-1c: Assess the feasibility of allowing a variety of home-based economic opportunities in residential neighborhoods, e.g., micro-kitchens, day cares, and home occupations.	For those opportunities determined feasible, establish a plan to Amend County Code.	June 2025
	Action 1-1f: Modify the housing rehabilitation program polices, as allowed by funding program guidelines, to assist lower-income homeowners in acquiring the necessary upgrades required to protect against indoor air pollution and poor drinking water quality associated with pesticide pollution. (Environmental Justice)	Modify the housing rehabilitation program policies to use funds, as allowed by funding program guidelines, for air and water filtration by December 2025, with a goal of improving filtration in 25 percent of the units rehabilitated. Focus marketing on neighborhoods with higher pollution burden (i.e., Rouse/Colorado, Bret Harte, and Airport).	December 2025

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	Action 1-2a: Evaluate the County Code for compliance with Section 17970.5 of the California Health and Safety Code and, if necessary, amend the County Code to require that upon a rental tenant complaint, a) a mandatory inspection be conducted and b) specific actions identified that can be taken to mitigate any hazards present. Develop internal policies aligned with Health and Safety Code Sections 17920.10 and 17920.3 to ensure inspections are conducted with the same urgency as final building inspections under Section 110 of the California Building Code. (Environmental Justice)	If determined necessary, amend the County Code and develop internal policies by December 2025. The goal shall be to inspect and specify actions to be taken within 30 days of the complaint being received.	December 2025
	Action 2-2d: Provide technical assistance to developers on how to use Density Bonus incentives. Promote density bonus for childcare facilities.	Meet with one qualified developer annually to provide information on the County's Density Bonus program. Maintain current information on the County's website, including notice of the Density Bonus update, within one month of adoption.	Ongoing – Annually
	Action 2-6a: Incorporate the sharing of the RHNA into the Local Agency Formation Commission (LAFCO) Sphere of Influence (SOI) negotiation process and annexation requests, recognizing the loss of County housing opportunities within the SOI area and County funding provided for housing projects within the city limits.	Establish criteria to be used by the County in negotiating RHNA sharing during LAFCO SOI negotiation and annexation requests.	January 2026
	Action 2-6b: Participate in policy and program development with cities and other regional agencies to implement Housing Stanislaus strategies and to prioritize funding for affordable housing projects and infrastructure needed to preserve existing housing and support new housing.	Annually meet with staff from cities and other regional agencies to assess implementation of Housing Stanislaus strategies, share successful practices, and troubleshoot ongoing challenges.	Ongoing – Annually
	Action 2-6c: Continue to collaborate with cities and other regional agencies to implement Stanislaus 2030.	Annually, evaluate opportunities to incorporate 2030 strategies into housing program implementation.	Ongoing – Annually
	Action 2-6d: Assemble an ongoing advisory committee to monitor progress and foster implementation of the Housing Stanislaus Initiative strategies.	Establish an advisory committee.	December 2025

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	Action 2-6e: Continue coordination within County agencies (Behavioral Health and Recovery Services, Community Services Agency, and Planning) to address the continuum of housing needs (i.e., "homelessness to homeownership").	Annually convene a meeting with all three County agencies to discuss respective housing programs/efforts to align efforts and identify and prioritize opportunities for housing mobility and place-based strategies (e.g., HCVs, anti-displacement policies, public investment in services and amenities) to improve community revitalization.	Ongoing – Annually
	Action 2-6f: Continue to collaborate with funding agencies and non-profit housing developers and public service providers for the development of permanent supportive housing.	In coordination with the CSOC, annually provide an opportunity for non-profit housing developers, public service providers, and funding agencies to share successful practices, and troubleshoot ongoing challenges with an aim at expanding opportunities for collaboration within the community.	Ongoing – Annually
	Action 3-1f: Proactively engage property owners of vacant and underutilized properties to encourage their pursuit of housing development.	Send annual notices to property owners of vacant and underutilized sites listed on the Sites Inventory offering to meet with them to discuss development options for their property.	Ongoing – Annually
	Action 3-5a: Evaluate, and if appropriate, amend the Zoning Ordinance to remove potential constraints for adaptive reuse, such as review/approval process and minimum parking standards. Promote adaptive reuse to property owners and interested developers through public outreach.	Evaluate the Zoning Ordinance and, if necessary, revise Zoning Ordinance within one year.	December 2025
	Action 3-9c: Continue to prioritize the use of the County's portion of HUD entitlement funding for sewer and water infrastructure projects.	Complete the West Modesto sewer project by the end of the planning period. In Fiscal Year 2029/2030, evaluate funding needs as part of the five-year Consolidated Plan update process to identify funding for future sewer and/or water infrastructure projects, particularly in Lower Resource areas, RECAPs, and areas of concentrated poverty, with priority given to areas with failing septic systems. Detail results of the evaluation in the five-year Consolidated Plan.	2031
	Action 3-9d: Meet with cities with unincorporated pockets of unincorporated residential development within their LAFCO-adopted Sphere of Influence to assess the feasibility of Tax	Meet with the cities and complete an assessment by June 2026 and report results as part of the Annual Progress Report. If determined feasible, draft a strategic plan to implement and utilize Tax Increment Financing	City outreach by June 2026 Draft plan by December 2031

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	Increment Financing Districts and Enhanced Infrastructure Financing Districts being used to support housing development.	mechanisms to facilitate residential growth by December 2031.	
	Action 3-9g: Continue to seek grant funding to construct infrastructure improvements.	Seek grant funding annually throughout the planning period, beginning in December 2025. Financially assist at least one infrastructure project per year with awarded grant funding, prioritizing projects in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (e.g., Airport, Rouse/Colorado, and Bret Harte).	Ongoing – Annually
	Action 3-9i: Revise the County's infrastructure priority project list as infrastructure projects are completed, prioritizing projects with the greatest health and safety needs.	Review the priority project list for infrastructure improvements after every project completion. In revising the list, give a scoring bonus consideration to Lower Resource areas, RECAPs, and areas of concentrated poverty with infrastructure need that can be met with available funding.	Ongoing
	Action 4-4a: Work with community groups and service providers to increase accessibility to public workshops by identifying suitable times, preferred meeting types (in person, virtual, or hybrid meetings), having meetings be accessible to persons with disabilities, and having meetings be accessible to nearby transit centers. (Environmental Justice)	Ongoing on a case-by-case basis.	Ongoing
	Action 4-4b: Maintain a list of neighborhood groups and other community organizations that advocate for protected housing groups including seniors, individuals with disabilities, large households, multi-generational households, and other groups, and disseminate information about housing opportunities and participate in community meetings as requested.	Develop list by December 2025 and update contact information annually. Disseminate information on an ongoing basis as opportunities become available.	December 2025
	Action 4-4c: Develop a countywide language access policy to ensure residents with limited English proficiency have accessible information. (Environmental Justice)	Implement policy	December 2025

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	Action 4-4d: Develop an outreach strategy building upon the Housing Stanislaus initiative for housing programs and community planning activities in an effort to increase participation. Collaborate with existing and new community stakeholders from all sectors and geographic areas to engage in the public participation process. Review the strategy annually to ensure all appropriate populations are reached. (Environmental Justice)	Develop an outreach strategy building upon the Housing Stanislaus initiative by December 2026 and review on an annual basis. Target outreach to communities with negative CalEnviroScreen scores and R/ECAPs. All outreach materials will be distributed in English and Spanish.	December 2026
	Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.	Review policies and procedures for community development and housing assistance programs by December 2026 and make necessary changes within six months.	December 2026
	Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of "Outstanding" and may exclude those with a rating of "Needs to Improve" or "Substantial Noncompliance" according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). Review an individual institution's most recent Home Mortgage Disclosure Act (HMDA) reporting as most recently published by the Federal Financial Institutions Examination Council (FFIEC).	Ongoing, during each funding cycle.	Ongoing
	Action 5-1c: Assess the feasibility of allowing a variety of home-based economic opportunities in residential neighborhoods, e.g., micro-kitchens, day cares, and home occupations.	For those actions determined to be feasible, establish a plan to amend County Code by January 2026. Within six months of amendment, promote the opportunities created by amendments in Lower Resource areas, R/ECAPs, and areas of	January 2026

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
		concentrated poverty such as Airport, Rouse/Colorado, and Bret Harte.	
	Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities.	Seek funding annually as applicable NOFAs become available. If funding is secured, within six months of grant award, issue an RFP for conceptual planning services. Focus efforts in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (i.e., Airport, Rouse/Colorado, and Bret Harte).	Ongoing – Annually
	Action 5-1e: Modify the County's program guidelines according to funding regulations, if necessary, to allow the use of eligible State and/or federal funding to repair failing septic systems.	Modify funding policies.	June 2026
	Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6th cycle Housing Element planning period.	Apply for Prohousing designation.	June 2026
	Action 5-1g: Offer training to County staff on a variety of topics included in the County's Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)	Beginning 2026, offer training sessions annually during the planning period.	Ongoing – Annually
	Action 5-1h: Update the Safety Element to comply with State Environmental Justice requirements and Housing Element Update regulations.	Complete the Safety Element Update by December 2026, and implement programs as specified in the element, reviewing progress annually with the Annual Progress Report.	December 2026
	Action 5-1i: Advertise existing workforce training classes offered through Stanislaus County Workforce Development to provide economic mobility, who partners with the local employment organizations to connect residents with job opportunities and workforce training program opportunities.	Continue to offer workforce development programs through the Stanislaus County Workforce Development and host an annual job fair in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (i.e., Airport, Rouse/Colorado, and Bret Harte).	Ongoing – Annually
	Action 5-1j: To enhance access in R/ECAP and lower-income areas, the County will continue to promote walkability and active transportation in compliance with the goals outlined in the Circulation Element.	On an ongoing basis, Public Works will continue to apply for grant funding, such as Active Transportation Program (ATP) funding, to improve multi-modal infrastructure, including sidewalks, in Low Resource areas of the County. Collaborate with StanRTA to expand and improve transit routes that connect low-income neighborhoods with employment centers, schools,	Ongoing

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
		and other essential services. Aim to complete at least two transit improvement projects detailed in the CIP (see Action 5-3e), including the Bret Harte and Rouse/Colorado sidewalk projects, during the planning period.	
	Action 5-1k: Support economic development efforts to promote housing mobility through consultation with local economic-focused organizations.	Meet annually with Workforce Development, Opportunity Stanislaus, Chambers of Commerce, and industry groups to engage local employers to identify entry-level positions with good pay that can be advertised to lower-income tenants.	Ongoing – Annually
	Action 5-1l: Continue to develop the Crows Landing Industrial Business Park to create living wage jobs where people live.	Continue to implement the Crows Landing Business Park Specific Plan. Complete infrastructure improvements included in Phase 1A by the end of the planning period.	2031

4 Housing Constraints

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

4.1 Governmental Constraints

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

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

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

4.1.1 General Plan and Zoning Ordinance

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

General Plan Land Use Designations

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

Table 4-1 Land Use Designations Permitting Residential Uses

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

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

Source: Stanislaus County General Plan, 2015

Community Plans

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

Denair Community Plan

The Denair Community Plan was adopted December 15, 1998, and encompasses a land area of 1,013 acres. Higher-density residential development is located near the downtown commercial core. Measure E, discussed further in Section 4.1.10, Growth Management, applies to agricultural land within the Community Plan area, and may present some barriers to housing development.

Keyes Community Plan

The Keyes Community Plan was adopted April 18, 2000, and encompasses a land area of 857 acres. New residential development is targeted for the community's northern and eastern areas. Measure E, discussed further in Section 4.1.10, Growth Management, applies to agricultural land within the Community Plan area, and may present some barriers to housing development.

Salida Community Plan

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

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

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

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

Source: Stanislaus County General Plan, 2015

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

The SCP also establishes different development standards for height limits and setbacks. For example, the SCP zones have a higher height limit but greater minimum rear yard setbacks as shown in Table 4-5 in Section 4.1.4. SCP zones also regulate the maximum number of stories to 2.5 stories in SCP-R-1 and SCP-R-2 zones and three stories in SCP-R-3 zones, unlike other residential zoning districts. Despite having standards that better accommodate a range of housing types and policies that support future housing development, that development has not been realized. Development in the SCP area is still required to undergo California Environmental Quality Act (CEQA) analysis, and Infrastructure to serve the amendment area of the Salida Community Plan is unknown and has not been evaluated, discussed further in Section 4.2.4, *Infrastructure Constraints*. Under Program 2.1g, the County will complete the necessary environmental review for the Salida Community Plan to facilitate housing development.

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

4.1.2 Zoning Ordinance

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

Residential Districts and Permitting

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

Table 4-3 Residential Zone Districts

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

1. Zoning densities do not reflect recent state laws that permit Accessory Dwelling Units (ADUs) in single-family zones.

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

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

4.1.3 Zoning for a Variety of Housing Types

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

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

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

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

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

Table 4-4 Housing Types Permitted by Zone

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

Legend

P= Permitted

UP=Use Permit

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

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

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

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

[5] SCP districts require a development plan and environmental review.

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

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

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

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

Source: Stanislaus County Zoning Ordinance, 2022

Accessory Dwelling Units and Junior Accessory Dwelling Units

Under State law (Government Code Sections 66310–66341), an accessory dwelling unit (ADU) is a dwelling unit that provides complete independent living facilities for one or more persons. It must be located on the same parcel on which a single-family dwelling or multifamily development is located or will be built and may be attached to or converted from a portion of the primary dwelling unit or separate from the primary structure (detached). An ADU includes permanent provisions for living, sleeping, eating, cooking, and sanitation. ADUs must be permitted ministerially pursuant to state law in all zoning districts that allow residential uses.

A junior ADU (JADU) is a dwelling unit limited to 500 square feet and converted from a portion of a single-family home. A JADU must contain a kitchen, but bathroom facilities may be shared with the primary dwelling unit. Owner occupancy of the primary dwelling unit is required, and no parking may be required for the JADU. JADUs must be ministerially permitted in zoning districts that allow single-family residences. Government Code Sections 66333–66339 establishes minimum standards for JADUs.

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

Emergency Shelter

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

AB 139, which went into effect on January 1, 2020, mandates that emergency shelters may only be subject to standards that apply to residential and commercial development within the same zone. AB 139 also states that a local government may only require sufficient parking to accommodate all staff working in the emergency shelter. However, a jurisdiction can apply standards regulating the following:

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

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

- The maximum number of beds shall not exceed ten;
- Outdoor activity and intake areas should be screened from public view and adjacent properties;
- Lighting shall be provided in all parking, pedestrian paths, and entry, and shielded it from adjacent uses;
- Off street parking shall be provided at a rate of one vehicle per employee, plus one additional parking space;
- A minimum of one supervisory level staff member on site during operation hours;
- A security plan approved by the sheriff's department;
- A licensed security guard provided during intake period;
- The maximum length of stay is no longer than six months;
- Hours of operation are publicly visible, and outdoor activity is only permitted during 8:00 am and 10:00 pm;
- An approved pet care plan (if pets are permitted); and
- Outdoor trash receptables are provided and properly maintained.

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

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

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

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

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

[1] 2022 Stanislaus County Homeless Point in Time Count, https://www.stanCounty.com/newsfeed/pdf/20220613-resch-pit.pdf

There are approximately 36 parcels of vacant land that range between 0.5 and one acres in the C-2, H-1, or M districts which allow emergency shelters, totaling 25.39 acres. With a rate of 200 square feet per person, this land has a capacity to shelter approximately 5,532 homeless individuals, significantly more than the required 76. Of these sites, nine parcels in the communities of Denair, Salida, and Empire encompassing approximately three acres are within walking distance of amenities and services including groceries, social services, medical services, and transit. These districts permit single-family and mobile home uses (when accessory to an onsite commercial/industrial use) by right and therefore comply with AB 2339's requirements. With a limit of 10 beds per shelter, a minimum of eight emergency shelters would be needed to accommodate the unsheltered residents in the unincorporated areas of the County.

The current 10 bed per shelter and 10 bed per zone limits are a constraint to the development of adequate shelter capacity. Additionally, requiring more parking than is required to accommodate staff, as stipulated by AB 139, adds additional project costs and is a constraint to the development of emergency shelters. As described in Program 4-3e, the County will update the zoning code to remove the ten bed per zone limit and increase the size limit for emergency shelters to at least 20 beds per facility, as well as reduce the off-street parking requirements. To comply with AB 2339, the County will also amend its definition of "emergency shelters" to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care (Program 3-6).

Farmworker/Employee Housing

The Employee Housing Act, specifically Health and Safety Codes Sections Code Sections 17021.5 and 17021.6, requires employee housing for six or fewer employees to be allowed wherever single-family homes are allowed. Health and Safety Code Section 17021.6 precludes a local government from requiring a conditional use permit, zoning variance, and/or other zoning clearance for employee housing consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single family or household in an agricultural zoning district. Additionally, Section 17021.8 requires a streamlined, ministerial approval process for farmworker housing as long as the development is located on land designated as agricultural, is not located in an environmentally sensitive or hazardous area.

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

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

The County's Zoning Ordinance requires a use permit for employee housing in the A-2 zoning district. However, the County permits employee housing consistent with State law through a staff level permit when the employees are living and working on lands farmed by the property owner in the agricultural zoning district. Additionally, the County offers a Temporary Mobile Home permit, a ministerial permit which can be used to apply for farmworker housing. Although the Zoning Ordinance language is not consistent with State law, in practice the County adheres to the Employee Housing Act in review of proposals for employee housing. On-site farmworker housing on agricultural land is allowed, subject

to ministerial approval. in compliance with State law. However, off-site farmworker housing, where residents do not work at the location of the housing, is allowed with a use permit. For clarity on the County's current practices and compliance with State law, the County will update its ordinance consistent with the Employee Housing Act to remove the use permit requirements for employee housing on agricultural land and allow for ministerial approval for projects with less than 36 units (see Program 4-2). The County has also established a Farmworker Advisory Committee one-year pilot program (approved by the Board of Supervisors November 12, 2024) with the goal of enhancing understanding and visibility of issues facing the County's farmworker population, including immigration, employment conditions, health, access to safety-net services, and housing. County staff will disseminate housing-related information and gather input from this committee on housing needs as needed (see Program 4-2). Lastly, Program 3-2 would exempt projects consisting entirely of farmworker housing from requiring a vote of the electorate to develop housing on agriculture sites that are subject to Measure E.

Manufactured Housing and Mobile Homes

"Mobile home" is defined as a structure that meets the definition of a manufactured home as defined by Section 18007 the California Health and Safety Code: a structure, which is transportable in one or more sections, is eight feet or more in body width, or 40 feet or more in body length, in the traveling mode, or, when erected onsite, is 320 or more square feet. Mobile homes are defined as being constructed prior to June 15, 1976, while a manufactured home is constructed on or after the same date. Manufactured housing and mobile homes can be an affordable housing option for low- and moderate-income households. Mobile homes and manufactured housing are regulated by Section 21.72 of the Stanislaus County Zoning Ordinance and are permitted in lieu of a single-family dwelling and by right in eight residential and commercial zoning districts except in the Historical Site District. Additionally, mobile home parks are allowed in all residential districts, Highway Frontage Districts, Neighborhood Commercial Districts, and General Commercial Districts subject to a use permit. Mobile homes and manufactured housing on permanent structures are subject to the same residential use development standards for single family uses applicable within each zoning district, which is consistent with Government Code Section 65852.3. As such, there is no constraint to the development of manufactured housing and mobile homes. The Stanislaus County Building Permit Division is responsible for issuing building permits for installation of manufactured homes on permanent and non-permanent foundation. The Building Permit Division follows HCD's guidelines and Health and Safety Code Section 1855(a) regulations and requirements for all manufactured home permits except for the Historical Sites District. Program 3-6j amends the Zoning Ordinance to permit mobile homes, subject to objective design standards, in the Historical Site District, further reducing the constraints to mobile home development.

Multiple Dwelling

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

dwellings that may fall into this category. In addition, the Zoning Ordinance will clearly define objective development and design standards that are required to permit these uses. (Program 3-7f).

Dwelling Group

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

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

Residential Care Facilities

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

Stanislaus County defines a residential care home as a dwelling, building or structure in which seven or more persons not of the immediate family are provided with food, shelter, and care for compensation, but not including hospitals, clinics, or similar institutions devoted primarily to diagnosis and treatment of disease or injury. Residential care homes for seven or more people are permitted by right in the R-3 and C-1 zoning districts and require a use permit in the R-A zoning District. Residential care homes for six or fewer residents are not defined or specifically listed as a permitted use, but are considered a residential use per Health and Safety Code 1566.3 and are permitted as single-family residences. Program 3-6 (Action 3-6c) commits the County to amending the Zoning Ordinance to remove the requirement for a conditional use permit for large residential care facilities in the R-A district, and ensure the use is subject to the same objective standards as other residential uses in the R-A district. The County will also establish objective standards for large and small residential care facilities to provide certainty to applicants through the permitting process.

Rooming House

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

Single-Family Dwelling

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

Single-Room Occupancy

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

Supportive and Transitional Housing

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

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

Supportive housing has no limit on length of stay, as set forth in Government Code Sections 65582 and 65650, occupied by low-income individuals who will receive, as part of their residency, supportive services designed to assist the individual in retaining housing, improving health, or enhancing other life functions. The target population includes homeless families, homeless youth, and persons with disabilities. Similar to transitional housing, supportive housing can take several forms, including group quarters with beds, single-family homes, and multifamily apartments.

The County's zoning code defines "Supportive Housing" as housing with no limit on length of stay that is occupied by the target population, as defined in California Government Code Section 65582(g), and that is linked to on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. It defines "Transitional Housing" as buildings configured as rental

housing developments but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months from the beginning of assistance.

Government Code Section 65651 requires supportive housing as a use by right in zones where multifamily and mixed uses are permitted. Stanislaus County's definition of dwelling unit includes transitional and supportive housing and is applicable to any zone that allows residential units. Therefore, in compliance with Government Code Section 65651, transitional and supportive housing is permitted by-right wherever residential units are allowed, in all zoning districts, including those permitting multifamily and mixed uses. In addition, the County will implement Program 4-3 to amend the zoning ordinance to establish a process allowing Permanent Supportive Housing in multifamily development in accordance with Government Code Section 65651. As a result, there are no constraints to the development of transitional housing.

Two-Family Dwelling (Duplex)

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

4.1.4 Development Standards

Table 4-5 summarizes residential development standards in the County's Zoning Ordinance. The County's residential requirements establish various development standards such as minimum setbacks, maximum lot coverage, maximum height, and minimum site area. Other development standards such as parking are discussed further below in Section 4.1.4, *Development Standards*, *Parking Standards*. Additionally, the County offers density bonuses, incentives, and concessions to qualifying developments which are also further described below.

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

Zone District	Minimum Front Setback	Minimum Side Setback	Minimum Rear Setback	Maximum Lot Coverage	Maximum Height	Minimum Site Area[1]
Agricultural						
A-2	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	N/A	N/A	3, 5, 10, 20, 40, or 160 acres
Residential						
R-A	15 ft. from road ROW (20 ft with garage) 10 ft. from side yard fronting a street (15 ft with garage)	5 ft.	5 ft.	40%	35 ft.	3 acres (Estate Residential) 8,000 square feet (Low Density Residential)

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

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

ft. = feet

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

Source: Stanislaus County Zoning Ordinance, 2022

Overall, Stanislaus County has comparable development standards to other similar jurisdictions such as San Joaquin County. Both jurisdictions have a minimum five-foot side yard setbacks for their residential zoning districts and a maximum building height of 35 feet for dwellings. The Zoning Ordinance does not regulate the number of stories except in SCP zones, which allow up to three stories in SCP-R-3 zones, but height limits of 35 feet in higher-density residential districts can typically accommodate three stories. Both jurisdictions also have lot coverages that range from 40 to 60 percent for their low- to high-density residential zoning districts. Stakeholder interviews with representatives of the development community indicated that they did not find development standards to be a constraint to housing development. Rather, land availability with adequate zoning (i.e., for multifamily housing) was identified as a constraint.[2]

Parking Standards

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

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

The Zoning Ordinance does not provide additional specificity regarding multifamily units. As a result, a three-bedroom unit in a multifamily building has the same parking requirements as a studio and one-bedroom. This places a disproportionate cost on smaller units, contributing to a constraint on the development of studios and one-bedroom units. Program 3-6k amends the zoning ordinance to develop parking standards based on unit size.

Currently, reductions in parking requirements are only offered through State Density Bonus incentives and concessions, or through Planned Development District zoning. Recent state laws have also limited the ability for jurisdictions to impose minimum parking requirements. For example, Housing Element Law (Government Code Section 65585) prohibits a public agency from imposing minimum parking requirements for any residential developments within half a mile from public transit with frequencies intervals of no longer than 15 minutes. The Stanislaus Regional Transit Authority (StanRTA) has about 26 bus routes that run throughout the County (not including commuter bus routes). The majority of the bus routes operate in the incorporated cities, but there are several that run through unincorporated communities, such as Keyes, Denair, Salida, Empire, Crows Landing, and Westley. Potential affordable housing developments in unincorporated communities that are near major incorporated cities like Modesto would most likely benefit from State law as some of the bus lines that operate in these areas would qualify under State law for a reduction in minimum parking requirements. Unincorporated communities that are further from incorporated cities have fewer bus routes that run frequently, and would thus not qualify for parking reductions allowed by State law.

[2] A complete summary of the findings gathered during stakeholder interviews can be found in Appendix A.
[3] Terner Center for Housing Innovation at UC Berkeley, 2016. Available at: http://ternercenter2.berkeley.edu/proforma/

Although the County's parking standards are similar to other surrounding jurisdictions and are generally not seen as a constraint, the County may offer opportunities for reduced parking for affordable housing units to bring down the costs of construction. As the County contemplates updates to its zoning code, such as the introduction of objective design or development standards for multifamily housing, it should consider this incentive in the future. As noted in Section 4.1.3, Multiple Dwelling, above, the County will implement Program 3-7f to adopt objective standards for multifamily housing, including requirements for parking, and identify objective standards to support streamlined housing approval.

Table 4-6 Parking Requirements by Residential Use Type

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

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

County of San Joaquin Zoning Ordinance. 2022. https://library.municode.com/ca/san_joaquin_County/codes/development_title?nodeId=TIT9DETI_DIV10DERE_CH9-1015PALO_9-1015.3REPASP

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

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

Unit Sizes

The Stanislaus County Zoning Ordinance does not regulate unit sizes. Therefore, it is not a constraint to the development of housing.

4.1.5 Processing Time and Permit Procedures

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

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

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

Table 4-7 Application Processing Time

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

Source: Stanislaus County Planning Forms, 2022
https://www.stanCounty.com/planning/forms/PLAN-application-questionnaire.pdf

If permitted by the zoning district, residential uses such as single-family homes, ADUs, multifamily developments, and manufactured homes that meet applicable requirements may be permitted through a ministerial review. If the zoning district requires a use permit, then the development must be reviewed and approved by the Planning Commission through a public hearing. The Planning Commission reviews the project based on applicable zoning requirements, density, and the ability to provide adequate wastewater and water service. The processing times in Stanislaus County are comparable to other neighboring jurisdictions such as San Joaquin County where a discretionary permit also takes about three months. However, Stanislaus County does not have a design review requirement like many other jurisdictions, except for H-S districts. For a subdivision, the average time between approval and issuance of a building permit during the last housing element cycle was six years. Generally, recordation of a tentative map takes about five years; however, that timeframe can be shorted if the market and financing conditions are supportive of the development. Building permits are typically issued within one year from recordation of the map.

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

General Plan Amendment

A General Plan Amendment requires a discretionary approval by the Stanislaus County Board of Supervisors, which considers a recommendation from the Stanislaus County Planning Commission, and requires CEQA review. A General Plan Amendment is reviewed by the Planning Department to ensure the proposed division of land meets local and State requirements. Per State law, General Plan Amendments can only be considered by the Board of Supervisors no more than four times per year, which limits public hearing scheduling and may add time to the review process. Additionally, Senate Bill 18 requires a 90-day tribal review period, which adds time to the review process. When reviewing a General Plan Amendment, the County considers the levels of public and private services that may be affected. Findings include the following[4]:

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

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

Zone Change (Rezone)

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

A. Overall, the proposal is consistent with the goals and policies of the General Plan.
B. There is evidence on the record to show a demonstrated need for the proposed project based on population projections, past growth rates and other pertinent data.
C. No feasible alternative site exists in areas already designated for the proposed uses.
D. Approval of the proposal will not constitute a part of, or encourage, piecemeal conversion of a larger agricultural area to non-agricultural uses, and will not be growth-inducing (as used in the California Environmental Quality Act).

[4] Stanislaus County Department of Planning and Community Development, Application Form. stanCounty.com/planning/forms/PLAN-application-questionnaire.pdf

E. The proposed project is designed to minimize conflict and will not interfere with agricultural operations on surrounding agricultural lands or adversely affect agricultural water supplies.
F. Adequate and necessary public services and facilities are available or will be made available as a result of the development.
G. The design of the proposed project has incorporated all reasonable measures, as determined during the CEQA review process, to mitigate impacts to agricultural lands, fish and wildlife resources, air quality, water quality and quantity, or other natural resources.

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

Subdivision and Parcel Map

A subdivision or parcel map application is submitted when a division of land is required for a development. All subdivision applications must comply with the County Subdivision Ordinance and the state Subdivision Map Act. A subdivision application is submitted to the Planning and Community Development Department and is reviewed by the Planning Department and the Public Works Department to ensure the proposed division of land meets local and state requirements. The application is then referred to the Planning Commission for approval. A Parcel Map or Tentative Map shall not be approved by the Planning Commission if any of the following findings[5] are made:

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

The Planning Commission may impose conditions of approval in connection with the subdivision. Subdivisions are subject to pre-approved master plans, which allows for a streamlined building permit review. On average, the time between project approval and map recording is five years.

Use Permit

A use permit is required to ensure that the establishment, maintenance, and operation of the proposed use or building is compatible with surrounding land uses and will not be detrimental to the health and safety of persons residing or working in the neighborhood, the property and improvements in the neighborhood, or the general welfare of the County. A use permit application is

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

submitted to the Planning and Community Development Department and is reviewed for consistency with the County Zoning Ordinance and General Plan. The application is also routed to other departments and applicable agencies that result in comments pertaining to consistency with fire, water, airport, and other agency standards. Once the County has reviewed the project and prepared an environmental assessment, if applicable, the project is recommended for review by the Planning Commission through a public hearing. The Planning Commission then votes to approve or deny the project. The Planning Commission must find that:

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

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

Site Plan Review

A Site Plan Review is a ministerial review required for new construction upgrades, and/or remodeling that requires a building permit. The site plan must provide all required information to show compliance with the Zoning Ordinance, Fire Code, and Building Code requirements. Stanislaus County does not have a Site Plan Review Committee and review site plans for compliance at a staff level as part of the regular land use entitlement or building permit application process.

On- and Off-Site Improvements

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

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

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

4.1.6 Fees

Planning/Processing Fees

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

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

The first step in the development review process is obtaining an "entitlement" and related environmental review. For planning entitlements, applicants provide a flat fee or an initial deposit depending on the entitlement type, which is then charged on a time and material basis. Stanislaus County primarily uses in-house staff for environmental review, except for the preparation of technical environmental studies (e.g., traffic and noise studies) or environmental impact reports. A typical Initial Study, with related environmental studies, is covered in the initial deposit or flat rate application fee. Additional studies (transportation, air quality, noise, health risk assessment, among others) may be required on case-by-case basis. The cost for projects requiring an Environmental Impact Report range drastically depending on the scale and complexity of the project. The Planning Division does not add an administrative or other charge to CEQA consultant fees, but does charge the actual cost for staff time in reviewing the documents and may charge for the cost of a County-contracted, third-party review.

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

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

Table 4-8 Stanislaus County Planning and Processing Fees

Entitlement Type	Fee
Planning Fees	
Use Permit (non-agricultural zones)	$5,549
General Plan Amendment	Actual Cost/Deposit $6,837
Specific Plan	Actual Cost/Deposit $21,990
Zoning Ordinance Variance	Actual Cost/Deposit $4,913
Zoning Ordinance Text Amendment	Actual Cost/Deposit $7,152

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

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

*Fees set by the State of California.

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

Impact Fees

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

Sewer and Water Fees

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

Public Facilities Fees

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

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

Traffic Impact Fees

The PFF program includes a Regional Traffic Impact Fee (RTIF)[7] to help mitigate the cumulative transportation impacts of growth. Improvements funded through the RTIF will fund roadway and intersection improvements, and other enhancements that may support multi-modal transportation. The RTIF is assessed on single-family homes, duplexes, multifamily homes, mobile home parks, and ADUs. The adopted fee for single family development is $3,592 per unit which is consistent with medium-sized retail and shopping center establishments and less than the RTIF for office and drive-through or gas station uses. For multifamily homes, the fee is $2,404 per unit which is similar to small retail uses but less than the fee for a single-family home. Further, the County has included traffic impact fees as an environmental mitigation measure for certain projects or community plans, and those are applied on a project-specific basis.

Park Impact Fees

The Department of Parks and Recreation maintains grounds and operations of identified parks and facilities and provides basic levels of services at all general funded neighborhood parks, reservoirs, and regional parks throughout Stanislaus County. The PFF park fee is charged through the building permit issuance process and assessed for both regional and neighborhood parks. Table 4-10 below shows a listing of these fees and are intended to ensure the provision of parks and open space are afforded to the growing population of the County commensurate with permitted development.

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

[7] Stanislaus County, Board of Supervisors, August 11, 2020, Agenda. https://www.stanCounty.com/bos/agenda/2020/20200811/PH02.pdf

Emergency Services Fees

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

School and Fire Developer Fees

There are 25 school districts and 20 fire districts in Stanislaus County; of which 12 school districts and 10 fire districts charge impact fees for all new development in unincorporated Stanislaus County. The school district fees are provided in Table 4-11 and the fire district fees are provided in Table 4-12. The fees are used for facility improvements and operations and are intended to offset the impact of increased numbers served. Developer Fees, which are assessed by the school and fire districts on a per square foot basis, are collected by the respective districts to pay the required fees. There are no reductions for affordable housing projects; however, small projects such as ADUs under 750 square feet may be exempt from school impact fees. Stanislaus County verifies payment of school and fire district fees at the time a building permit is issued, and only verifies payment of fees to high school districts.

Table 4-9 Stanislaus County Development Impact Fees

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

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

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

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

Type	Single Family/Duplex	Multifamily/ Mobile Home	Accessory Dwelling Unit
Total Fees	**$10,171**	**$6,688**	**$3,061**

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

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

Table 4-11 Stanislaus County School District Fees

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

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

Source: Stanislaus County

Table 4-12 Stanislaus County Fire District Fees

School Districts	Fees
Stanislaus Consolidated Fire	Waterford ▪ Not fully fire sprinklered: $0.29 per sq-ft ▪ Fully fire sprinklered: $0.22 per sq-ft" Riverbank ▪ Not fully fire sprinklered: $0.19 per sq-ft ▪ Fully fire sprinklered: $0.14 per sq-ft
Oakdale Rural Fire	No fee*
Keyes Fire	$0.43 per sq-ft
Denair Fire	No information at this time
Hughson Fire	$0.60 per sq-ft
Mountain View	No information at this time
Salida Fire Protection	$0.49 per sq-ft
West Stanislaus Fire	$0.86 per sq-ft
Westport Fire	No information at this time

School Districts	Fees
Woodland Fire	$0.36 per sq-ft

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

Source: Stanislaus County

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

Table 4-13 shows development impact and permit fees for single-family and multifamily developments on a per-unit basis for a 1,500 square foot unit on a single lot. Depending on the location, single-family residential development fees are estimated to range from approximately $13,974 to $15,054 per unit and multifamily residential development fees are estimated to range from $19,632 to $20,712per unit. Multifamily development is slightly more costly to build on a per-unit basis than single-family development, but roughly comparable.

Table 4-13 Residential Development Fees

	Cost Per Unit	
	Single-Family	**Multifamily**
Use Permit	n/a	$5,693
Transportation	$3,592	$2,404
Animal Services	$118	$77
Behavioral Health	$92	$60
Criminal Justice	$134	$87
Detention	$1,091	$710
Emergency Services	$16	$10
Health	$353	$230
Library	$350	$228
Other County Facilities	$2,121	$1,381
Regional Parks	$346	$225
Neighborhood Parks	$671	$437
Sheriff	$1,078	$702
Countywide IT	$10	$6
Admin Charge	$199	$131
Fire	$210-$1,290	$210-$1,290
School	$7,185	$7,185
Total Per- Unit Fees	**$22,958-$24,038**	**$23,067-$24,147**

Source: Stanislaus County Planning Services Fee Schedule and Public Facilities Fees

4.1.7 Review of Local Ordinances

Density Bonus

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

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

4.1.8 Building Codes and Enforcement

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

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

The Building Permits Division also investigates and enforces regulations for substandard buildings. These investigations occur in response to complaints received or during their daily inspections. During the investigations of substandard buildings, the building inspectors provide homeowners with information regarding the County's housing rehabilitation programs to assist homeowners repair their homes. The California Health and Safety Code Section 17980(b)(2) states that government enforcement agencies, when deciding whether to require vacation or repair of a building, shall give preference to repair a building whenever economically feasible to do so without having to repair more than 75 percent of the dwelling. The Abatement of Dangerous Buildings (ADB) program involves the

evaluation of a structure and has building inspectors work with the owners to resolve the issues. A building must be declared a nuisance by the Stanislaus County Board of Supervisors before the building can be demolished. The Stanislaus County Nuisance Abatement Hearing Board provides recommendations to the Board of Supervisors on requests to declare a nuisance.

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

4.1.9 On- and Off-Site Improvements

For residential projects consisting of new subdivisions with lots of less than 20,000 square feet, the County requires both on- and off-site improvements. These include curb/gutter and storm drainage facilities, sidewalks, paved streets, landscaping, parks, and water and sewer service. Such improvements are required as a condition of the subdivision map and are required to be installed prior to the recording of the subdivision map. As stated in HUD's study of Subdivision Requirements as a Regulatory Barrier, such requirements can reasonably be considered regulatory barriers to affordable housing if the County determines that the requirements are greater (and hence, more costly) than those necessary to achieve health and safety requirements in the community.[8] In adopting its standards, by ordinance or as conditions of approval, the County finds that on- and off-site improvements promote the health, safety, and general welfare of the public.

Curbs, gutters, and drainage facilities direct stormwater and runoff water out of residential developments. Paved County streets and roads create an all-weather roadway, facilitates roadway drainage and safety for the driving public, and reduces dust. Developers are responsible for the development of roadways associated with the residential project and also participate in regional transportation system improvements through a portion of the public facilities fee. Sidewalks provide for the safety of pedestrian traffic, particularly for school-age children, seniors, and the physically impaired. In some cases, the County requires block walls. The County uses the Quimby Act requirements that residential subdivisions provide three to five acres of park land per 1,000 people.

Development of and connection to municipal water and sewer services are required for a constant supply of potable water. Sewer services are necessary for the sanitary disposal of wastewater. These offsite requirements allow the development of much higher residential densities. Although the above improvements understandably add to the cost of any project, they are considered necessary in order to meet the basic health and safety needs of Stanislaus County residents. The County can mitigate the cost of these improvement requirements by assisting affordable housing developers in obtaining state and federal financing for their projects or providing regulatory and financial incentives.

Site Improvement Requirements

Roadway classifications are specified in Stanislaus County's Land Use Element. These classifications range from an expressway road, where the proposed right-of-way width is up to 224 feet, to a local street, with a right-of-way width of approximately 50 feet. The Subdivision Ordinance[9] establishes design standards for minimum right-of-way road widths. Other subdivision improvements regulated by Title 20 the County's Subdivision Ordinance and the County's Standards and Specifications are detailed below.

[8] U.S. HUD. 2007. Study of Subdivision Requirements as a Regulatory Barrier. https://www.huduser.gov/portal/publications/commdevl/subdiv_report.html
[9] County of Stanislaus Zoning Ordinance Title 20 Subdivisions. https://ecode360.com/43727425

Street Grade Standards

Grading and paving of all streets and highways shall be to a cross-section and grade approved by the Director of Public Works and the Stanislaus County Standards and Specifications. Existing streets bordering the subdivision shall be improved as follows:

- If existing street pavement is at proper grade and the structural section conforms to the type specified in this chapter, the street shall be improved to the edge of the existing pavement.
- If the existing pavement is at proper grade and the structural section is substandard, then the existing surfacing shall be removed to the centerline of the street and the entire half- street bordering the subdivision shall be reconstructed to the standards required in this chapter.
- If the existing street is not at proper grade, the subdivider shall deposit with the department of public works an amount to be determined by the Director, equal to the cost of constructing the one-half street to the proper grade and structural standards set forth in this chapter. Money so deposited will be used by the County to reconstruct the street. When reconstruction cannot be scheduled within a reasonable time, the County will oil the unimproved area as an interim improvement.

Street Grade Stormwater Collection

Grades of streets shall be established so stormwater can be collected at intersections designated by the Director and the minimum grade of all streets shall be 0.20 percent.

Street Structural Section

The design of the structural section for all streets shall be based on: (a) the Resistance Value R; (b) the expansion properties of the soil; and (c) the traffic index (T.I.). The traffic index will be determined by the Director.

Curbs, Gutters, and Sidewalks on Lot Abutting a Public Street or Highway

Curb, gutter, sidewalk, and matching pavement shall be required for all lots or parcels abutting in a public-maintained street or highway except as follows:

- In A-2 districts designated as agricultural in the Land Use Element of the General Plan;
- In A-2 districts designated as urban transition on the Land Use Element of the General Plan for all lots or parcels of ten acres or more in gross area;
- In R-A districts designated as rural residential on the Land Use Element of the General Plan.

Sidewalk Waiver

In R-A districts designated as residential on the Land Use Element of the General Plan, the requirement for sidewalk may be waived when all lots or parcels being created are one acre or greater. In M or P-D districts, the requirement for sidewalks may be waived if the ultimate development of the subdivision will not generate pedestrian traffic and the street will not be a pedestrian route or a safe route to school.

Curbs, Gutters and Sidewalks – Side Streets

Curbs, gutters, and sidewalks shall be constructed on side streets where they are required on the fronting street.

Curbs, Gutters and Sidewalks – Delayed Development

Where a parcel map is being filed and there are no standard curbs for a distance of one-half mile from the frontage of the property being divided, or if the Director determines that it would be undesirable to install curbs and gutters because of the length of time before street construction or improvements are contemplated, construction of improvements may be postponed, but the Planning Commission shall require the subdivider or developer to either deposit with the County a sum of money equal to the proposed cost of improvements, to be used by the County at such time as full street improvements are warranted, or execute a street improvement agreement with the County to assure the installation of concrete curb, gutter, sidewalk (when required by code) and matching pavement on demand by the County.

Sanitary Sewers

Sanitary sewers, when required, shall be constructed to a location and design approved by the Director or service provider in accordance with their standards. The subdivider shall obtain and submit a copy of a letter from the governing board of the sewer system stating its ability to provide sanitary sewers and to handle the sewage from the proposed subdivision, and that a satisfactory agreement has been entered into for connection to the sewer system by the subdivision. Sewer lines and appurtenances shall comply with a design approved by the governing board of the sewer system and state requirements with relation to the location of domestic wells and water lines.

Individual Sewage Disposal Systems

Individual sewage disposal systems are required to be permitted by the Department of Environmental Resources, and when permitted, shall be constructed and operated in compliance with the provisions and standards set forth in the most recent version of the document titled "Guidance to the Construction and Operation of On-Site Wastewater Treatment Systems" on file with the Department of Environmental Resources that is in effect on the date that a completed application for the permit is submitted to the Department of Environmental Resources. However, new subdivisions with individual septic tanks are unlikely due to lot size requirements.

Streetlights

Streetlights shall be installed to the standard approved by the Board of Supervisors in areas designated as residential, commercial and industrial on the Land Use Element of the General Plan. Developing property shall annex into an existing street lighting district. A street lighting district shall be established if no such district already exists.

Storm Drains

Storm Drains shall be provided by the subdivider for the disposal of stormwater according to methods approved by the Board of Supervisors. Developing property shall annex into an existing County Service Area (CSA) to provide for the maintenance and operation of the stormwater collection system.

Improvements—Supplemental Capacity

- As a condition of approval of a tentative map, final subdivision map, or parcel map, the subdivider may be required to install improvements ("improvements" as defined in the Subdivision Map Act) for the benefit of the subdivision.

- In the event the County requires installation of improvements pursuant to subsection A of Title 20, the County shall enter into an agreement with the subdivider to reimburse the subdivider, or his successor in interest, for that portion of the cost of those improvements, including an amount attributable to interest, in excess of the construction required for the subdivision.
- In order to pay the costs as required by the reimbursement agreement, the County may:
  - Collect from other persons, including public agencies, using such improvements for the benefit of real property not within the subdivision, a reasonable charge, including interest thereon and administrative costs, for such use;
  - Contribute to the subdivider that part of the cost of the improvements that is attributable to the benefit of real property outside the subdivision and levy a charge upon the real property benefited to reimburse the County for such costs, together with interest thereon and administrative costs; or
  - Establish and maintain local benefit districts for the levy and collection of such charge or costs, together with interest thereon and administrative costs, from the property benefited by the supplemental capacity, size, number, or length.
- No charge, area of benefit, or local benefit district (as described in subsections (C)(1), (2), and (3) of Section 20.56.260) shall be established unless and until a public hearing is noticed and held thereon by the Board of Supervisors and the Board finds that the fee or charge and the area of benefit or local benefit district is reasonably related to the cost of such supplemental improvements and the actual ultimate beneficiaries thereof.
- Written notice of the hearing shall be given to the subdivider, to those who own property within the proposed area of benefit as shown on the latest equalized assessment roll, and the potential users of the supplemental improvements insofar as they can be ascertained at the time.
- Such notices shall be mailed at least ten calendar days prior to the date established for the hearing.

Cumulative Impact of Subdivision Requirements on Development Costs

County staff reached out to local developers to gather input on whether subdivision improvement requirements constrained residential development. In response, developers concluded that, while there are other potential constraints to housing development in unincorporated Stanislaus County that add uncertainty and extra cost to the development process (e.g., lack of existing infrastructure), subdivision standards do not necessarily pose undue constraint on development. The County's subdivision regulations for site improvements are similar to other jurisdictions, and do not present a constraint to the development of housing.

4.1.10 Growth Management

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

To address perceived development pressure on agricultural land due to the rapid growth occurring throughout the County, in 2007, voters of the County passed Measure E, a 30-year land use restriction

initiative that requires that any redesignation or rezoning of land in the unincorporated area from agricultural or open space use to residential use must be approved by a majority vote of the County voters at a general or special local election. Residential use means any land use designation, zoning district or other legislative entitlement authorizing, allowing, or consistent with residential development at a density greater than one dwelling unit per 10 gross acres.

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

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

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

Measure E is generally not a constraint to development. Sites under Measure E are not well suited for housing development sufficient to meet the County's share of the RHNA. The type of parcels that are under Measure E restrictions are generally large, zoned for agriculture, rural, and do not have available public infrastructure (water or sewer treatment service). Developing those parcels would require establishing the necessary infrastructure, and those sites are generally not located in existing communities. Measure E also serves an important purpose in protecting agricultural land and maintaining this important sector of Stanislaus County's economy.

Measure E can act as a barrier to housing development when affected land is located in Community Plan areas and city Spheres of Influence adopted by the Stanislaus Local Agency Formation Commission that have access to infrastructure and have services available. Discussions County staff have had with developers reveal that Measure E in this context can be a constraint; but developers also agree that for most Measure E land not in existing communities, the cost to develop and install infrastructure makes development impractical.

The County can do little to change the provisions of the Measure E without further voter approval. However, the County periodically reviews Measure E to see if the ability for the County to meet its housing needs is constrained. Those reviews have found it to not be a constraint. While there are a limited number of parcels located within the City of Modesto's Sphere of Influence that may have developed without the barrier of Measure E, other factors such as proximity to off-site services and market conditions could also have been barriers to development. For areas within the communities of Denair and Keyes that have lands designated in community plans for residential development, but General Plan and zoning designations triggering Measure E, market conditions, resulting from the impacts of the Great Recession, were a major barrier during much of the 5th cycle Housing Element.

As market conditions improved during the 5th cycle, requirements to plan for development of these larger areas, by use of specific plans or other planning tools, and the cost of extending infrastructure were also barriers. Measure E alone has not been a barrier to housing development. As subdivision interest in these communities picked up towards the end of the 5th cycle housing element, shifts in the economic outlook, reflected in increasing inflation and interest rates, also served as barriers to development.

Measure E does include provisions that exempt the public vote requirement if the County's RHNA needs for lower-income units cannot be met. The Housing Element recognizes this as an option if the land identified for rezone fails. The County's assessment of Measure E will continue to be required in accordance with Program 3.1f, which will require evaluation of Measure E on a bi-annual basis, and the County commits to rezoning eligible parcels if sufficient progress has not been made toward meeting its share of the RHNA. An exemption would occur when HCD certifies in writing that all of the following circumstances exist:

- The approval is necessary and required to meet the County's legal fair share housing requirement; and
- There is no other land in the County or the cities in the County already designated for urban use that can accommodate the County's legal fair share housing requirement.

The Board of Supervisors may redesignate up to 10 acres per year for residential use without a vote of the electorate of the County. Additional acreage may be designated for residential use if the Board finds, and HCD certifies in writing, that the additional acreage is necessary to meet the Board's legal fair share obligation based on maximum multifamily densities. Any proposal approved under this subsection shall be required to have all housing units permanently affordable to persons or families of very low, low, and moderate income. Any development project consisting entirely of farmworker housing is also exempt from requiring a vote of the electorate.

Per Policy 3F, the County will undertake actions such as Program 5-1 (Action d) of the Housing Plan to facilitate infill development in existing neighborhoods to reduce the pressure to convert agricultural land outside of existing communities. Program 3-1 will ensure adequate sites in existing communities are available for development to meet the County's RHNA obligations, and Program 3-9 will ensure adequate infrastructure is available to serve infill sites. Additionally, the County will promote infill housing development and maintain an inventory of infill sites through Program 3-2 (Action e) and reduce development standards for irregular and small lots in existing communities through Program 3-1 (Action i). Other programs to reduce barriers to developing infill housing include actions 2-1d, 2-1g, 3-1h, 3-5a, 3-6b, 3-6j, 3-7b, and 3-7f.

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

Definition of Family

The Federal Fair Housing Act requires that local jurisdictions do not discriminate against persons based on familial status. Familial status is defined as one or more individuals under the age of 18 living with a parent/legal guardian, or the designee of such parent. A rental agreement with a restrictive definition of "family" that limits the number of individuals living together may illegally limit the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated.

The County's Zoning Ordinance defines "family" as one or more persons occupying a premises and living as a single, nonprofit housekeeping unit, as distinguished from a group occupying a hotel, club, fraternity, or sorority house (Ord. CS 106 Sec. 1 (part), 1984). The inclusion of "non-profit" in the County's definition of "family" could constrain the development of group homes and residential care facilities that are owned by for-profit businesses or that pay a house manager or resident to help manage a home's operations. The County will commit to removing references to "nonprofit" in the definition of "family" (Program 4-1e).

Reasonable Accommodation Procedures

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

Reasonable accommodation procedures are codified in the County's Zoning Ordinance Chapter 21.86. As stated in the Zoning Ordinance, "in order to make housing available to an individual with a disability, any person may request a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability, equal opportunity to housing of their choice." Requests for reasonable accommodation are submitted as a ministerial permit subject to the staff approval permit application process. The Planning Director or their appointed designee reviews and approves or denies within thirty days after the application is deemed complete. If the application for a reasonable accommodation involves another discretionary decision the Planning Director reviews and determines the approval of the reasonable accommodation request, and then this decision is then accepted by the reviewing body of the discretionary permit. A decision to approve, approve with modifications, or deny a request for reasonable accommodation must be consistent with federal and state fair housing laws. The Planning Director must approve a request for accommodation if the following findings can be made:

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

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

4.1.12 State Streamlining

SB 35 requires that eligible projects be reviewed for compliance and consistency with the County's objective standards and are not subject to discretionary processes, such as CEQA review and public hearings. Eligible projects with 150 units or fewer must be approved within 90 days and projects with more than 150 units must be approved within 180 days.

Eligible developments must include a specified level of affordability, be on an infill site, comply with existing residential and mixed-use General Plan or zoning provisions, and comply with other requirements such as locational and demolition restrictions. A local government that has been designated as subject to the Streamlined Ministerial Approval Process by HCD shall provide information, in a manner readily accessible to the public, about the locality's process for applying and receiving ministerial approval, materials required for an application and relevant objective standards to be used to evaluate the application. A local government cannot impose application requirements that are more stringent than required for a final multifamily entitlement or standard design review in its jurisdiction. Further, SB 35 requires approval of housing projects to be based on objective design standards. The County has not yet received any applications subject to SB 35 ministerial approval processing requirements. Currently the County does not have written procedures for SB 35 Streamlined Ministerial Approval Process. The County will adopt procedures to address SB 35 (Program 3.7-g).

In addition, AB 1397 requires that 5th cycle opportunity sites re-used in the 6th cycle inventory and identified to accommodate lower-income units (very low-income and low-income) be subject to by-right approval if projects include 20 percent affordable units for lower-income households on-site. The County will implement Program 3-4 to incorporate AB 1397 requirements.

The Housing Crisis Act of 2019 (SB 330 and amended by SB 8) establishes a statewide housing emergency and creates new state laws focused on the production and preservation of housing. SB 330 and SB 8 aim to expedite and increase certainty in the development process with changes to the Housing Accountability Act and Permit Streamlining Act that will be in effect from January 1, 2020, to January 1, 2030. SB 330 also addresses the statewide housing shortfall with new protections for existing housing and restrictions on certain zoning actions that reduce the availability of housing. The legislation creates a preliminary application process, and housing developments will only be subject to those ordinances, fees, and policies in effect when the completed preliminary application is submitted. Like SB 35, SB 330 limits jurisdictions from imposing subjective design standards on housing developments. Objective standards are limited to design standards that involve no personal or subjective judgment by a public official. They must be verifiable by reference to an external and uniform benchmark available to both the applicant and the public official prior to application submittal. Stanislaus County will adopt procedures to develop objective design standards (Program 3-7f).

Permit Streamlining Act

Stanislaus County must comply with California's Permit Streamlining Act (PSA) and its integration with the CEQA by adhering to specific procedural and timing requirements to ensure efficient and legally compliant permitting processes. These procedures are as follows:

- **Initial Application Completeness Review.** The County has 30 days to determine whether a development application is complete. If incomplete, the County provides a written list of deficiencies to the applicant. Once resubmitted, the 30-day review period restarts.

- **CEQA Compliance and Determinations.** CEQA is often interlinked with PSA as environmental review is a prerequisite for approving many discretionary permits. The County determines whether the project is exempt from CEQA or requires further environmental review (e.g., a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report). CEQA determinations are made within PSA's timelines where possible.
- **CEQA Timing.** For a Categorical Exemption or Initial Study, if a project is exempt, processing can proceed immediately under PSA deadlines. If a project requires an Initial Study, the timelines for preparing CEQA documents apply. A Negative/Mitigated Negative Declaration must be completed within six months of accepting the application as complete. An Environmental Impact Report (EIR) must be completed within one year of accepting the application as complete.
- **Decision Timelines Under PSA.** For projects that require a public hearing, once a CEQA determination is finalized, the County must approve or deny the project within 60 days. For ministerial or CEQA-exempt projects, the County must act within 180 days of deeming the application complete.
- **Streamlining Determinations.** The County incorporates state-mandated streamlining measures, such as:
  - SB 35 (Streamlined Housing Projects): Eligible housing projects can bypass discretionary reviews if they meet specific criteria.
  - CEQA Streamlining Tools: Utilize provisions like tiering, program EIRs, or exemptions for infill and transit-oriented developments to accelerate review.
  - Permit Streamlining Act Default Approval: If the County fails to act within PSA timelines, the project is deemed approved unless subject to CEQA review.

4.1.13 Transparency in the Development Process

To increase transparency in the development process, the County's website publishes resources that help developers and homeowners navigate the residential development and home improvement processes. The County's Planning and Community Development webpage provides links to building permit guides, ADU information, CEQA, and planning initiatives such as the Housing Element Update[10]. The webpage also provides links to the County's Zoning Ordinance, General Plan, fee schedules, and applications and forms. The County also provides contact information for the Director of Planning and Community Development. The County's Planning Division website complies with the new transparency requirements in California Government Code Section 65940.1(a)(1).

4.2 Non-Governmental Constraints

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

[10] County of Stanislaus Building Permits Division. https://www.stanCounty.com/planning/bp/index.shtm

Stanislaus County has unique challenges related to sewer and water infrastructure, as well as some distinct challenges related to environmental hazards.

4.2.1 Construction Cost

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

The International Code Council estimated in 2023 that the national average cost per square foot for good-quality housing was approximately $156 for multifamily housing, $178 for single-family homes, and $196 for residential care/assisted living facilities.[11]

Sources specific to Stanislaus County indicate the construction cost of a home can range between $150 to $340 per square foot, or $300,000 to $680,000 for a 2,000-square-foot home depending on the quality of construction. [12] The lower end of this range, typical for multifamily housing, would price a 500-square-foot unit, based on recent examples in Stanislaus County, at $75,000 to construct. If labor or material costs continue to increase, then increased construction costs have the potential to constrain new housing construction and the rehabilitation of existing housing. While the costs above vary based on higher construction costs in the State of California, construction costs are not specifically identified as a constraint for Stanislaus County.

4.2.2 Land Cost

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

The cost of raw, developable land creates a direct impact on the cost of a new home. A higher cost of land raises the price of a new home because developers consider the cost of land while evaluating the feasibility of a development. When land costs are high, developers must ask for higher rent or sales prices to make their development feasible. Residential land prices in Stanislaus County average between $35,000 to $75,000 per acre of raw multifamily residential land[13,14]. Prices for raw single-family residential land can vary greatly between $50,000 and over $150,000 per acre. While land costs increase over time, these raw costs are not necessarily a constraint to housing. A comparison to San Joaquin County shows that costs are slightly lower, and still relatively inexpensive when compared to

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

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

[13] Zillow, 2022. https://www.zillow.com/homes/stanislaus-County_rb/ Date Accessed December 12, 2022.

[14] LoopNet. 2022. https://www.loopnet.com/search/commercial-real-estate/stanislaus-County-ca/for-sale/?sk=f8a819bda2a65db93f7ba04b3d889f36 Accessed December 12, 2022.

counties in the Bay Area. As a result, raw land costs are not considered a constraint to the development of housing in Stanislaus County.

4.2.3 Availability of Financing

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

Affordable Housing Programs

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

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

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

Private Financing for Homebuyers

Due to high housing costs, mortgage financing is required in most cases to purchase or improve a home. Lack of access to mortgage financing is a barrier to achieving housing stability through long-term stable housing costs afforded to homeowners, and lack of access to home improvement loans makes it difficult for homeowners to maintain their homes and preserve housing stability. The discussion on loan outcomes provided below is from the Stanislaus Urban County, City of Modesto,

and City of Turlock Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice (AI), including outcomes by income and race.[15]

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

Mortgages and Loan Outcomes

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

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

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

Loan Outcomes by Applicant Income

For each of the three years analyzed, most individuals applying for a loan fell into the upper income bracket. For example, upper income individuals represented 45.3 percent of applicants in 2008, 43.6 percent of applicants in 2013, and 49.2 percent of applicants in 2018 (Table 4-14). Furthermore, the shares for applicants among the remaining income levels decreased as the income bracket decreased. In other words, there were fewer applicants in the lower income brackets. Regarding approval rates, upper-income applicants generally experienced the highest rates, which is a common finding across many jurisdictions.

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

Table 4-14 Loan Outcomes by Applicant Income Level in Stanislaus County

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

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

Loan Outcomes by Applicant Race

Table 4-15 presents the loan outcomes by race for applicants in Stanislaus County for 2008, 2013, and 2018. Chapter 3, *Assessment of Fair Housing*, examines mortgage applications and decisions by race in more detail. Overall, Black/African American, American Indian/Alaska Native, and Hispanic/Latino residents were underrepresented in the number of applications filed. Denial rates were also higher for those racial and ethnic groups. As discussed further in Chapter 3, *Assessment of Fair Housing*, disproportionate lack of access to financing is a fair housing issue.

Table 4-15 Loan Outcomes by Applicant Race and Ethnicity

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

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

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

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

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

4.2.4 Requests for Lower Development Densities

Many factors influence the actual density of a project and can result in significantly lower densities than the maximum density allowed by zoning. During the 5th Cycle, the County received requests on four parcels to develop at a capacity of less than what was assumed in the 5th Cycle Sites Inventory.

Requests for lower development densities are subject to the same permit approval timelines as other application types. Subdivisions benefit from pre-approved Master Plans, which streamline building permit reviews and allow for quicker transitions to construction. Subdivision maps are valid for two years after project approval, with the possibility of six additional one-year extensions under State law, allowing a total lifespan of up to eight years. On average, the time between project approval and map recording is five years.

Table 4-16 shows the units identified and what was ultimately developed on the 5th Cycle sites mentioned above. Three of these parcels were developed with commercial buildings. The County will implement Program 3-1h to rezone sites with minimum density and development standards.

Table 4-16 Requests for Lower Development Densities During the 5th Cycle

APN	Zoning	Units Identified in 5th Cycle Sites Inventory	Development that occurred
133-014-023	H-1	13	One commercial building
133-015-016	H-1	11	One commercial building and one residential unit
045-030-062	H-1	1	One commercial building
039-002-023	R-A	3	Two residential units

4.3 Infrastructure Constraints

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

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

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

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

The 2020-2025 Stanislaus County Analysis of Impediments to Fair Housing Choice identifies infrastructure as a clear constraint to housing development. Action 8.1 states, "Examine possible gaps in public infrastructure and services, especially for the needs of persons with disabilities, seniors, and low-income residents via a Disadvantaged Unincorporated Communities assessment. If significant gaps are found, explore methods to address the gaps and incorporate public improvements and services into local infrastructure and service plans." In accordance with Action 8.1, the County should analyze the gaps in public infrastructure and services, including accommodations for lower-income housing needs and the needs of seniors and persons with disabilities. Infrastructure is therefore identified as a constraint and the County will implement Program 3-9b to continue exploring methods to address gaps and improve public and social services and infrastructure support for local communities.

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

4.4 Environmental Constraints

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

4.4.1 Federal and State Environmental Protection Regulations

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

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

4.4.2 Geologic and Seismic Hazards

Earthquake

Earthquakes can cause structural damage, injury, and loss of life, as well as damage to infrastructure networks such as water, power, gas, communication, and transportation lines. There are several faults known to exist within Stanislaus County. The nearest faults of major significance are the San Andreas to the west of Stanislaus County, a distance of approximately 25 miles from the County line; the Calaveras faults to the northwest; the White Wolf, Garlock, and Sierra Nevada faults to the south; and the Bear Mountain Fault Zone about five miles east of and parallel to the eastern border of Merced County. These faults have been and will continue to be the principal source of seismic activity affecting the County of Stanislaus.[16]

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

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

The Stanislaus County Capital Improvement Plan, along with the Capital Project Program, supports the goal of the County to protect critical facilities and infrastructure. The Capital Projects Team is actively working to incorporate MJHMP priorities in the CIP to protect facilities and infrastructure. The most recent CIP identified eight bridge replacements to rectify seismic deficiencies. Earthquakes can be unexpected and detrimental to infrastructure and housing, especially for housing built prior to 1976. The 2022 MJHMP identifies several objectives to limit development in areas with high geologic hazard risk, and to rehabilitate structures that are not earthquake resistant. The County will explore

[16] https://www.stanoes.com/pdf/mjhmp/2022-MJHMP-draft.pdf

programs to retrofit existing housing to comply with current building code standards in order to preserve existing housing stock through Program 1-1.

Landslides and Erosion

Excessive erosion can contribute to landslides, siltation of streams, undermining foundations, and ultimately the loss of structures. The Stanislaus County MJHMP states that hazards due to landslide events are limited to areas within the foothills in the western and eastern edges of the county. Deep-seated landslide susceptibility is mostly located west of the I-5 freeway, with a susceptibility class ranging between seven to ten (ten being the highest). However, there have not been any disastrous events associated with landslides in Stanislaus County[17]. Further, any new development will be subject to mitigation measures contained in the County's Safety Element. These include approving new development in areas of geologic hazards only when there is an acceptable evacuation route, and the routes of public roads are designed to minimize seismic risk. Additionally, development west of 1-5 will only be permitted when a geological report provides evidence that there are no onsite hazards, or they can be mitigated. Future projected housing developments are located outside of the areas with increased susceptibility to landslides. Therefore, landslide risk does not constrain housing development.

4.4.3 Wildfire

Stanislaus County is susceptible to both urban and wildland fires. The areas most vulnerable to wildfire are in the State Responsibility Areas (SRA) on the eastern and western edges of the County (see Figure V-6 of the County's Safety Element). There has been little to no development within the majority of the SRA with the exception of the development in Diablo Grande. There has also been development of ranchettes (two-to-ten-acre homesteads) on the eastern side of the County between Knights Ferry and the City of Oakdale. These ranchettes are located primarily in the SRA. The California Department of Forestry and Fire Protection (CAL FIRE) has designated Knights Ferry, La Grange, Oakdale, and Riverbank as communities with increased risk from wildfires[18]. A small percentage of the County's total area currently with housing or identified for future housing is within a Very High Fire Severity Zone (see Figure V-6 of the County's Safety Element). Future housing within high fire zones must have higher development costs due to the additional materials and safety measures required to additional protect the residents and property. Due to the small percentage of current and future housing in the Very High Severity Zone, wildfire is not considered a constraint.

4.4.4 Flood Risk

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

[17] Stanislaus County Local Hazard Mitigation Plan, 2017, https://www.stanoes.com/pdf/lhmp/2017-lhmp.pdf
[18] CAL FIRE, 2022, https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/fire-plan/communities-at-risk/

4.4.5 Excessive Noise

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

According to the Noise Element (Chapter IV) of the County's General Plan, highways and freeways are the most significant sources of noise affecting sensitive land uses in Stanislaus County. This is followed by other roadway traffic such as principal arterials, minor arterials, and major collectors. In addition to traffic noise on local roadways, freight and passenger trains contribute to community noise levels[19]. While these requirements may impose specific mitigation or building requirements related to housing development, they are not considered a significant constraint to development.

[19] https://www.stanCounty.com/planning/pl/gp/current/gp-chapter4.pdf

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5 Housing Resources

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

5.1 Regional Housing Needs Assessment Requirement

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

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

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

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

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

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

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

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

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

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

5.2 Fulfilling the RHNA Obligation

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

5.2.1 Planned or Approved Units

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

family homes are usually sold at market-rate prices, with no affordability covenants attached to the land. Multifamily or single-family developments that use density bonuses, public subsidies, or other mechanisms that restrict rents or sales prices would be restricted to specified below-market rate prices affordable to households in the various income categories described above. There are currently ten projects in the development pipeline as shown on Table 5-2 in Figure 5-1. These projects are primarily focused within the Keyes and Denair communities. Together, these projects include 252 market-rate units affordable to above moderate-income households.

Once a building permit is issued, construction typically begins within a few months. Subdivisions benefit from pre-approved Master Plans, which streamline building permit reviews and allow for quicker transitions to construction. Subdivision maps are valid for two years after project approval, with the possibility of six additional one-year extensions under State law, allowing a total lifespan of up to eight years. On average, the time between project approval and map recording is five years.

Based on the County's record, there are often significant delays between the date of development approval and the date of building permit issuance. This is the result of developer delays in securing financing and does not result from the County's permitting process. Occasionally, approved projects result in expired entitlements. Of the ten examples listed in Table 5-2, two expired and required new land-use entitlements. Both projects have received new entitlements:

- *Orange Grove Estates:* Originally approved in 2006, this map expired due to the developer's failure to file a time extension request. A new map was approved in 2018.
- *Isaaco Estates:* Approved in 2016, this map expired for the same reason. A new map was approved in 2021.

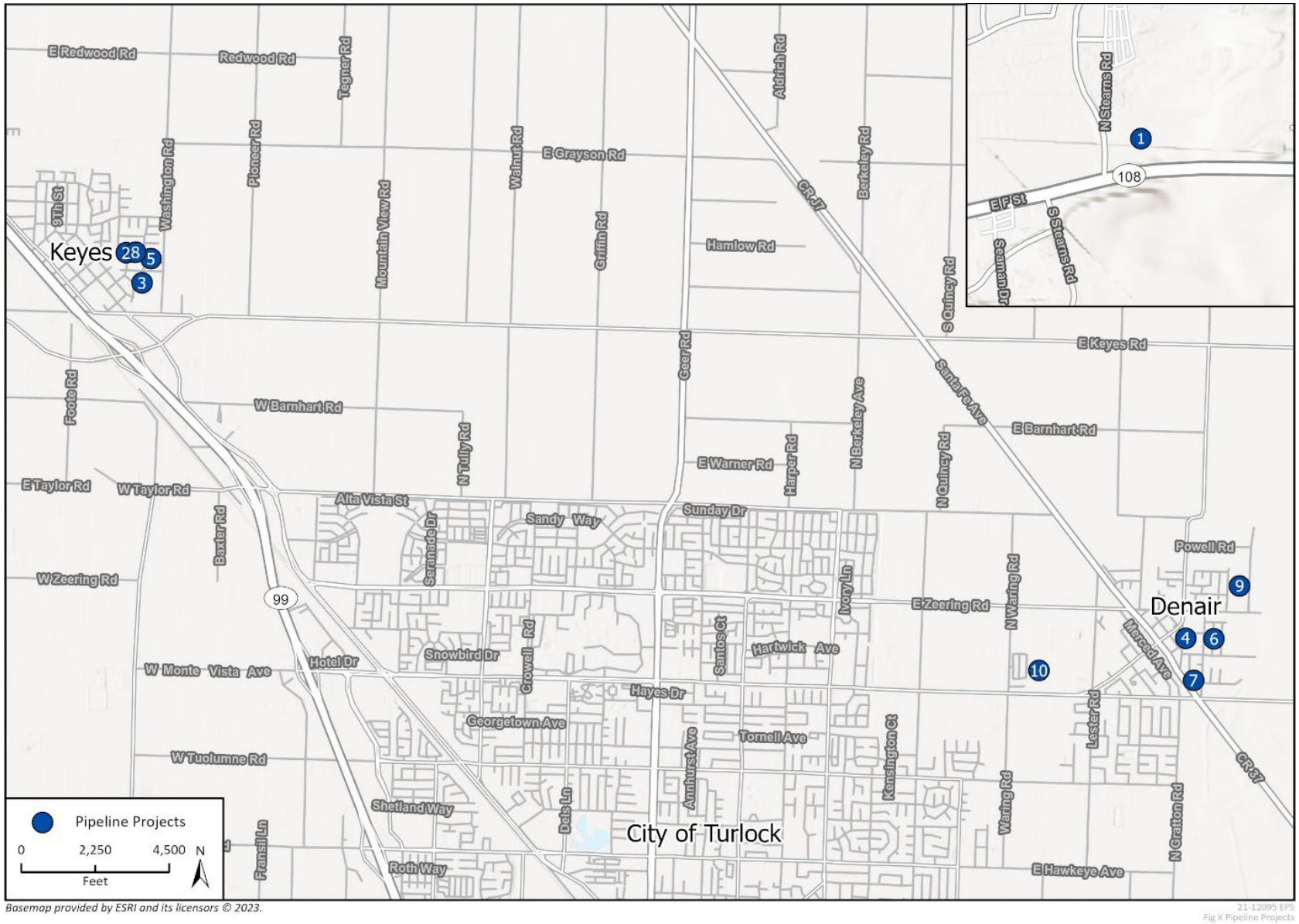
Programs 2-1 and 3-4 of the Housing Plan seek to reduce constraints on housing development by assisting developers with developments costs for affordable projects and creating a ministerial approval process for housing developments that include 20 percent of the units as housing affordable to lower-income households. There are no known barriers, within the County's control, which would preclude development in the planning period. Based on the current status the projects listed in Table 5-2, the County anticipates all pipeline projects will be completed during the planning period.

Table 5-2 Planned and Approved Projects

Map ID	Project Name	APN	Total Units Approved	Total units built	6th cycle RHNA	Date of Approval	Time Extensions (one-year each)	Grading Permit/BOS Approval	Date of Subdivision Map Recordation	Date of Building Permit Issuance	Status and Estimated Completion Date
1	Fairway 7 Estates	064-081-001 to -013	13	8	6	1/26/16	Two ext. to 1/26/20	2/2/2018 submitted/2/5/18 issued/10/15/21 finaled	9/3/2021	2/8/22	Full build out est. in 2025
2	Keyes 19 North	045-075-001 to -027; and 045-076-001 to 037	64	64	3	10/18/16	Two ext. to 10/18/21	BOS acceptance of improvements 6/15/21	7/1/2021	4/6/22	All 64 lots have been issued building permits (61 in 5th cycle and 3 in 6th cycle)
3	Gold Star Inv. (Keyes at Norma)	045-071-006	28	20	28	11/6/18	One ext. to 11/6/21	12/9/2019 issued/ 8/27/2021 finaled/BOS acceptance of improvements 11/7/23	11/16/23	3/11/24	Remaining 8 units have building permits issued; Construction is nearly complete and permits are all in various phases of being finaled.
4	WPD Homes, Inc.	024-024-037	13	0	13	August, 2021	N/A	N/A	N/A	N/A	(TM PLN2024-0014 – FQC, Inc. – Going to Board in 01/25 to create 11 zero lot line lots for townhomes & UP PM PLN2024-0015 – FQC, Inc. to create to zero lot line lots for townhomes going to PC on 12/19/24)
5	Orange Grove Estates	045-021-041	8	0	8	7/17/18	Five ext. to 07/17/25	N/A	N/A	Map not yet recorded	Grading permit is under review; Construction anticipated to occur within planning period
6	Elmwood Estates	024-055-060	17	0	17	12/6/22	One ext. to 12/6/25	10/11/24 submitted	N/A	Map not yet recorded	Construction anticipated to occur within planning period

Map ID	Project Name	APN	Total Units Approved	Total units built	6th cycle RHNA	Date of Approval	Time Extensions (one-year each)	Grading Permit/BOS Approval	Date of Subdivision Map Recordation	Date of Building Permit Issuance	Status and Estimated Completion Date
7	Isaaco Estates	024-025-002, -014, -052, -053	11	0	11	9/28/21	Two ext. to 9/28/25	3/30/22 submitted/8/14/24 issued	N/A	Map not yet recorded	Grading permit issued 9/11/23; Preparing Board item for improvement plans; Construction anticipated to occur within planning period
8	Keyes 19 South	045-071-005	27	1	27	10/18/16	Three ext. to 10/18/21	BOS acceptance of improvements 11/7/23	11/16/2023	4/30/24	Remaining 26 units have building permits being reviewed.
9	Hoffman Ranch Subd.	024-022-027	67	0	67	6/6/23	N/A	N/A	N/A	Map not yet recorded	Currently working on subdivision improvement plans; Recording of the map and construction anticipated to occur within the planning period.
10	Lazares Subd.	024-012-009	72	0	72	08/16/22	One ext. to 08/16/25	6/6/24 submitted/8/8/24 issued	N/A	Map not yet recorded	Grading has begun; Working with Public Works on their Subdivision Improvement Plan; Map recording and construction anticipated to occur within planning period
Total Units			**320**	**93**	**252**						

Figure 5-1 Planned and Approved Projects



5.2.2 Accessory Dwelling Units (ADU)

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

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

5.2.3 Remaining Share of RHNA

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

Table 5-3 shows the remaining RHNA after subtracting 436 anticipated units from pipeline projects and ADUs. The County has satisfied approximately 18 percent of its total RHNA allocation for the 2023-2031 planning period. The County must demonstrate the availability of sites with appropriate zoning and development standards that allow and encourage the development of an additional 2,039 units. This total includes 574 very low-income, 398 low-income, 458 moderate-income, and 609 above moderate-income units.

Table 5-3 Remaining Share of RHNA

Affordability Category	RHNA Allocation	Units Pending or Approved or Under Construction	Estimated ADUs	Remaining RHNA
Very Low	574	0	0	574
Low	398	0	0	398
Moderate	458	0	0	458
Above Moderate	1,045	252	184	609
Total	**2,475**	**252**	**184**	**2,039**

5.2.4 Capacity of Identified Residential Sites Under Current Zoning

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

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

- **Rural Residential (R-A).** This zone provides single-family residential uses on larger lots, small-scale agricultural operations, and related development standards. The Zoning Code permits a minimum building site area of 8,000 square feet for sites services by public sewer and water facilities, 20,000 square feet for sites services by public water and septic tank facilities or private well and public sewer facilities, and one acre for sites services by private well and sept tank facilities. The minimum building site area is three acres for sites with Estates Residential Land Use designation.
- **Single Family Residential (R-1).** This zone provides for single-family residential uses and related activities at densities up to eight dwelling units per acre if served by public water and sewer, or two dwelling units if served by a septic system.
- **Medium Density Residential (R-2).** This district provides for low-density residential uses and related activities as permitted in the R-1 zone and for multifamily dwellings at densities up to 14 dwelling units per acre.
- **Multiple-Family Residential (R-3).** This district provides for any residential uses and related activities as permitted in the R-1 and R-2 zone and for multifamily dwellings and apartment houses at densities up to 25 dwelling units per acre.
- **Planned Development (P-D).** Planned Development zoning provides opportunities for larger-scale projects incorporating creative and cohesive design concepts. The district is intended to allow modification of requirements established by other districts and diversification in the relationship of different uses, buildings, structures, lot sizes and open spaces, while ensuring compliance with, and implementation of the General Plan. The P-D-zoned sites included in the inventory are already subdivided and allow one dwelling unit per parcel.

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

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

Residential Development Trends

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

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

Project	Locality	Zoning	Max Density	Site Acreage	Total Units	Achieved Density (du/acre)	Percent Yield
Fairway 7 Estates	East Oakdale	R-A (Well and Septic)	1.0	8.10	8	0.99	100%
Keyes 19 North	Keyes	R-1	8.7	11.80	62	5.25	61%
Gold Star Investments, LLC	Keyes	R-1	8.7	5.87	28	4.77	55%
Orange Grove Estates	Keyes	R-1	8.7	1.89	8	4.23	50%
Elmwood Estates	Denair	Will rezone to new P-D	8.7	4.82	17	3.53	41%
Isaaco Estates	Denair	R-A	5.4	2.86	11	3.85	73%
Keyes 19 South	Keyes	R-1	8.7	5.10	26	5.10	59%
Hoffman Ranch Subdivision	Denair	Will rezone to new P-D	8.7	15.90	76	4.78	55%
Lazares Subdivision	Denair	R-A (Public Water and Sewer)	5.4	18.20	69	3.79	70%
Single Family Average						**4.03**	**63%**
Oak Leaf Meadows	Oakdale	R-2	14	3.25	56	17.2	123%
Stonegate Village	Patterson	Medium Density Residential	12	7.00	138	19.7	164%
Avena Bella, Phase 2	Turlock	Planned Development	30	2.20	61	27.7	92%
Archway Commons Phase 1	Modesto	Planned Development	29	4.50	76	16.9	58%
Archway Commons Phase 2	Modesto	Planned Development	29	3.17	74	23.3	80%
3313 Coffee	Modesto	Planned Development	29	0.9	15	16.3	56%
0 Vine Street	Modesto	Planned Development	29	0.6	35	62.0	214%

Project	Locality	Zoning	Max Density	Site Acreage	Total Units	Achieved Density (du/acre)	Percent Yield
3600 Dale	Modesto	Planned Development	29	1.7	44	25.6	88%
112 James Street	Modesto	R-3	29	0.3	7	25.6	88%
WPD Homes Duplexes	Denair	Planned Development	14	0.77	10	13.0	92%
Multi-family Average						**24.7**	**106%**

On average, multifamily developments throughout the County achieved densities of 25 dwelling units per acre and on average achieved over 100 percent of the maximum density allowed on the site. Typically, single-family developments throughout the unincorporated areas of the County acheived densities of approximately 63 percent of the maximum density allowed on the site. Finally, a recent duplex project in Denair by WPD Homes will construct 10 units on a 0.77 acre lot for an aceived density of 13 dwelling units per acre or 92 percent of the maximum density allowed. It is anticipated that this trend will continue in the unincorporated County as land becomes available for subdivision and development. Table 5-5 summarizes the Sites Inventory density assumptions by zone.

Table 5-5 Sites Inventory Density Assumptions by Zone

Zoning District	Maximum Density (du/acre)	Realistic Density Assumption (du/acre)	Assumption Basis
R-A (“Estate” General Plan designation)	0.33	0.25	Based on typical percentage of maximum density achieved across single-family projects (63%).
R-A (served by one of either public water or public sewer)	2.2	1.7	Based on typical percentage of maximum density achieved across single-family projects (63%).
R-A (served by public water and sewer)	5.4	3.4	Based on typical percentage of maximum density achieved across single-family projects (63%).
R-1	8.7	5.5	Based on typical percentage of maximum density achieved across single-family projects (63%).
R-2	14.0	10.5	Conservative assumption of 75% of the maximum density in the R-2 zone. The WPD homes project is similar to the type of development expected in the R-2 zone achieving 92% of the maximum density.
R-3	25.0	16	Conservative assumption of 64% of maximum density of the R-3 zone. The typical percentage of maximum density achieved across multifamily projects in the County was approximately 106%.
P-D (Del Rio Community Plan)	1.0	0.8	Based on the expected buildout of the Del Rio Community Plan area. Surrounding area is developed at approximately 2 dwelling units per acre.
P-D	1 unit/parcel	1 unit/parcel	Subdivided; allows 1 dwelling unit per parcel.
DGSP	1 unit/parcel	1 unit/parcel	Subdivided; allows 1 dwelling unit per parcel.

Programs 3-1 through 3-9 of this Housing Element will ensure that sites in inventory develop at anticipated densites, by the following actions:

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

Table 5-6 shows the assumed realistic capacity of sites for each zone district.

Table 5-6 Realistic Capacity of Sites with Current Zoning

Zoning District	Total Acreage	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
R-A	205.22	0.33 – 5.4	0.25 – 3.4	0	0	317	317
R-1	21.87	8.7	5.5	0	0	109	109
R-2	17.3	14.0	10.5	0	90	36	126
R-3	11.17	25.0	16.0	0	132	31	163
P-D (Del Rio CP)	81.9	1.0	0.8	0	0	65	65
P-D	25.91	1 unit/parcel*	1 unit/parcel*	0	0	48	48
DGSP	155.31	1 unit/parcel*	1 unit/parcel*	0	0	112	112
Total	**521.72**			**0**	**222**	**718**	**940**
Remaining RHNA after Credits (see Table 3-3)				**972**	**458**	**609**	**2,034**
Shortfall (Surplus) of Zoned Capacity				**972**	**236**	**(109)**	**1,099**

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

Based on the methodology detailed above, the Sites Inventory identifies vacant and underutilized sites with existing zoning that have the capacity to accommodate over 100 percent of the County's remaining RHNA for above-moderate income units, and 49 percent of the remaining RHNA for moderate income units. There remains a shortfall of capacity to accommodate 972 housing units affordable to lower-income households and 236 housing units affordable to moderate-income households.

5.2.5 Rezoning to Accommodate a Shortfall of Residential Capacity

To accommodate this shortfall of capacity, the County is obligated to rezone land suitable to facilitate the development of at least 972 housing units affordable to lower-income households and 233 housing units affordable to moderate-income households. The rezone program will allow the development of higher-density multifamily housing as detailed in Program 3-1 of the Housing Plan.

The Sites Inventory includes 48 sites that will be rezoned to facilitate additional residential development. All sites will be rezoned to allow a maximum density of at least 25 dwelling units per acre and require a minimum density of 20 dwelling units per acre. The County assumes that for all sites identified to be rezoned, the realistic residential density of the site is equal to the required minimum density of the relevant zone district. Table 5-7 summarizes the capacity of sites proposed for rezoning.

Table 5-7 Realistic Capacity of Rezoned Sites

Zoning District	Total Acreage	Maximum Density	Realistic Density	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
R-3	82.99	25	20	1,068	268	29	1,365
Planned MU	5.30	25	20	36	60	8	104
Total Units	**88.29**			**1,104**	**328**	**37**	**1,469**

5.3 Adequacy of the Sites Inventory

The sites identified in the inventory can accommodate 940 residential units based on the residential densities allowed under current zoning. In addition, the County will apply 252 units from planned and approved housing projects and 184 units of anticipated ADU production. Capacity for an additional 1,494 units will be accommodated on sites to be rezoned following the adoption of this Housing Element.

In total, the Sites Inventory has identified sites to accommodate the development of 2,409 units. This would give the County a 14 percent buffer for lower-income units to ensure that the Sites Inventory has adequate capacity to accommodate the RHNA for lower-income levels throughout the planning period. The County can accommodate more than 60 percent of its RHNA for lower-income units on vacant land suitable for residential development.

Through Program 3-2, the County will monitor development on sites listed in the inventory and how this development contributes to or detracts from overall progress toward meeting its share of the RHNA. A summary of the results of the residential Sites Inventory is presented in Table 5-8.

Table 5-8 Adequacy of Residential Sites Inventory

	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
RHNA Allocation	**972**	**458**	**1,045**	**2,475**
Planned and Approved Units	0	0	252	252
ADUs Anticipated	0	0	184	184
Remaining RHNA	**972**	**458**	**609**	**2,039**
Total Units on Vacant/Underutilized Sites (Not to be Rezoned)	0	222	718	940
Total Units on Rezoned Sites	1,104	328	37	1,469
Total Units on Vacant Sites	0	87	493	580
Total Units on Non-Vacant Sites	0	135	200	325
Total Units	**1,104**	**550**	**755**	**2,409**
Total Unit Surplus	**132**	**92**	**146**	**370**

5.4 Sites Inventory by Community

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

Overall, the intention of the Stanislaus County sites inventory is to focus development within existing communities where infrastructure and services are in place to support multifamily development. The sites identified in this inventory have a potential development capacity of 2,409 units. The following discussion of the Sites Inventory is divided into 17 unincorporated areas:

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

5.4.1 Airport

The Airport community is part of unincorporated Stanislaus County and shares a border with the City of Modesto which provides water and sewer service to the area. Most of the community is zoned for residential uses, with the largest portion zoned R-3 multifamily. The properties identified in the Sites Inventory are vacant and fall within the multifamily zone. No rezoning is proposed. Table 5-9 summarizes available capacity in the Airport neighborhood and Table 5-10 details all residential sites in this area.

Table 5-9 Summary of Residential Capacity in Airport

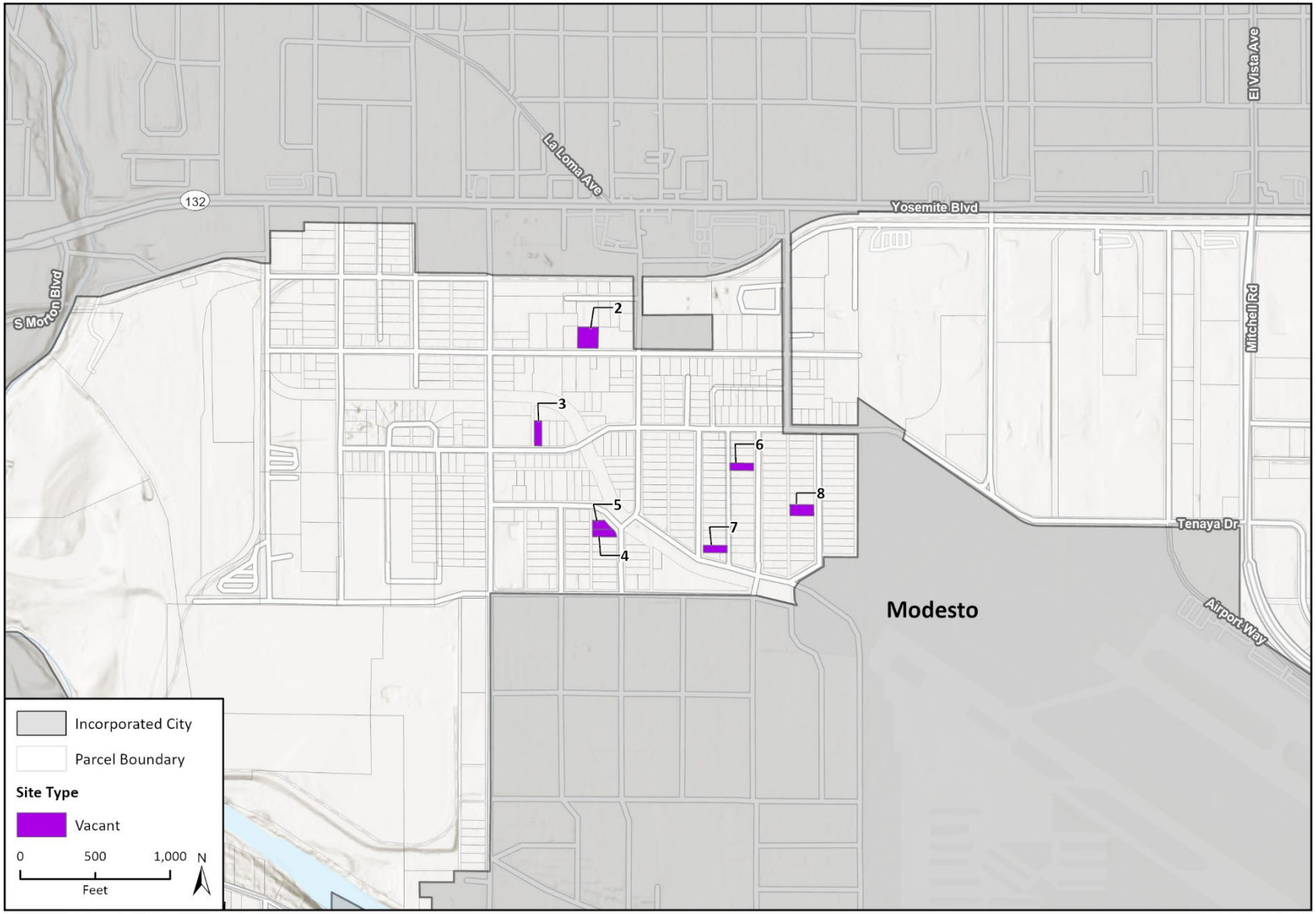
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	7	1.61	0	15	7	22
Rezoned Sites	0	0.0	0	0	0	0
Total	**7**	**1.61**	**0**	**15**	**7**	**22**

The Sites Inventory identified 1.61 acres of vacant and underutilized land within the Airport community (as shown in Figure 5-2) which can accommodate 22 housing units on seven sites. Of these 26 units, 18 units are assigned to the moderate-income category and eight units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to small parcel size and lower TCAC opportunity category scores of identified sites. The TCAC Resource categories for the sites in this community are High Segregation and Poverty.

Table 5-10 Residential Sites in Airport

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
2	1409 MONO DR	035027020	0.45	Vacant	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
3	TENAYA DR	035034011	0.19	Vacant	R-3	No Change	25	3	No	High Segregation and Poverty	YES - Current
4	507 KERR AVE	035038017	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
5	505 KERR AVE	035038018	0.15	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
6	409 EMPIRE AVE	035039005	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
7	430 THRASHER AVE	035039019	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
8	419 S CONEJO AVE	035040025	0.28	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current

Figure 5-2 Sites Identified in Airport



5.4.2 Bret Harte

Bret Harte is an unincorporated community south of the City of Modesto. The Sites Inventory groups together the Bret Harte, Crater, Olivero, and Parklawn neighborhoods and the commercial corridor of Crows Landing Road into the "Bret Harte" area. This area is also known more largely as the South Modesto area. Sites identified in this area are vacant residential properties or occupied by aging auto sales and service uses. The City of Modesto provides sewer and water service to portions of the unincorporated Bret Harte area. Table 5-11 summarizes available capacity in the Bret Harte neighborhood and Table 5-12 details all residential sites in this area.

Table 5-11 Residential Capacity in Bret Harte

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	18	4.22	0	0	23	23
Rezone Sites	10	29.67	481	101	8	590
Total	**28**	**33.89**	**481**	**101**	**31**	**613**

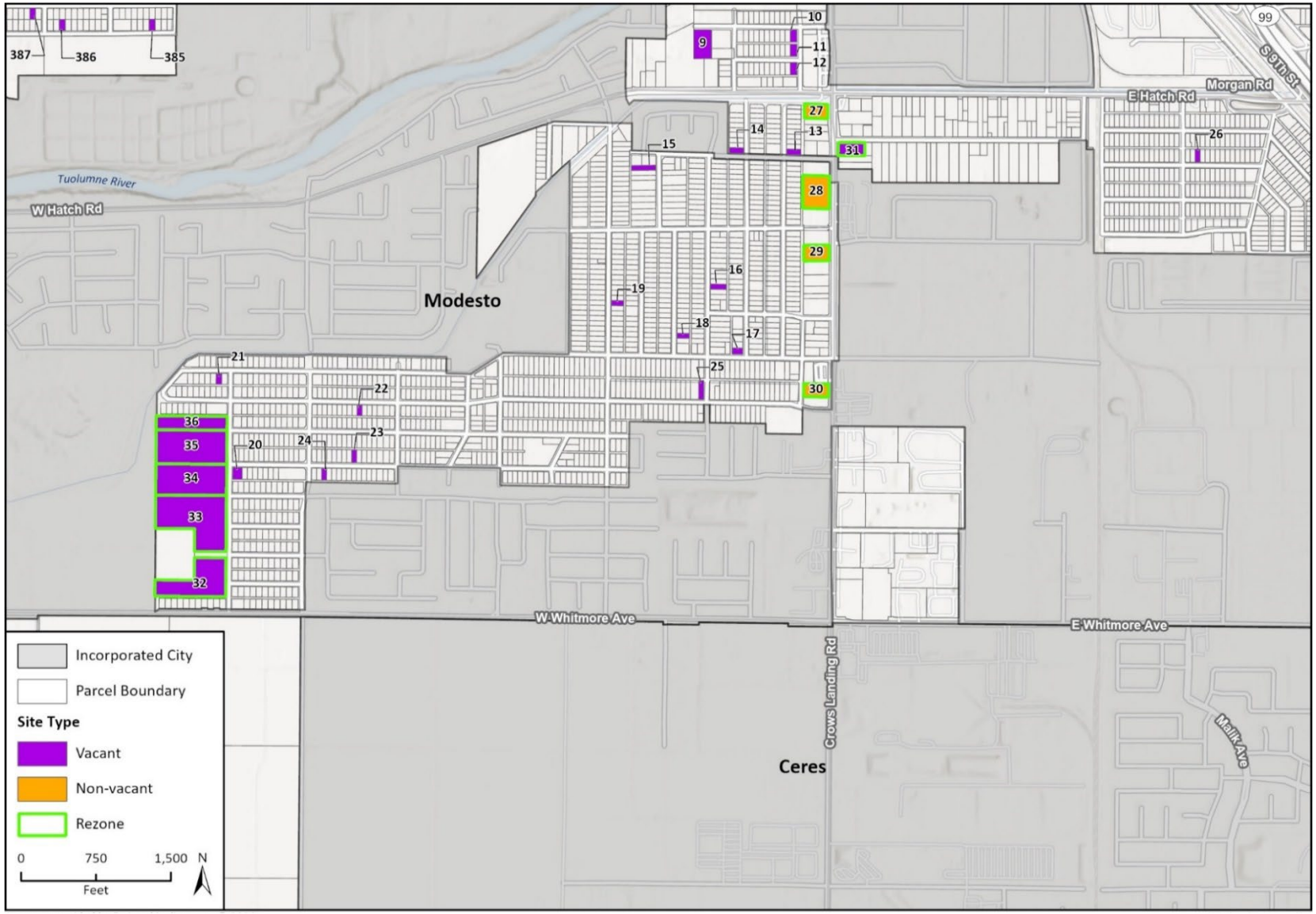
The Sites Inventory identified 4.22 acres of vacant and underutilized land within Bret Harte (as shown in Figure 5-3) which can accommodate 23 housing units. Approximately 24 acres of land over 5 single-family residential zoned parcels surrounding Fairview Park will be rezoned to accommodate residential development at 25 dwelling units per acre. An additional five General Commercial (C-2) zoned sites encompassing five acres along Crows Landing Road will be rezoned to Mixed Use (MU) which will be modified to allow mixed-use development at a maximum density of 25 dwelling units per acre as described in Program 3-1. The Crows Landing Road commercial corridor is also the subject of the City of Modesto's Southwest Modesto Plan which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, and infrastructure extending to the unincorporated area. The Southwest Modesto Plan and Modesto's Housing Plan both modeled a blend of high-density residential and commercial development on several vacant and underutilized sites along the Crows Landing Road corridor. Including the proposed rezoning, an estimated 613 housing units are projected in the Bret Harte community. Of these 613 units, 481 units are assigned to the lower-income category, 101 units are assigned to the moderate-income category and 31 units are assigned to the above moderate-income category. Larger sites (i.e., between two and eight acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

Table 5-12 Residential Sites in Bret Harte

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
9	CRATER AVE	038023014	1.18	Vacant	R-1	No Change	8.7	6	No	Low Resource	YES - Current
10	200 CRATER AVE	038026011	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
11	201 GLACIER AVE	038026012	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
12	200 GLACIER AVE	038026033	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
13	1534 EUREKA ST	056011022	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
14	1529 SPOKANE ST	056012010	0.18	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
15	1607 PORTLAND AVE	056014003	0.28	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
16	1744 SEATTLE ST	056019051	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
17	1825 SPOKANE ST	056020009	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
18	1818 DENVER ST	056021026	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
19	1760 DALLAS ST	056023033	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
20	TUCSON & LASSEN AVE	056034002	0.26	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
21	1604 GLENN AVE	056037032	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
22	1228 IMPERIAL AVE	056039010	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
23	1231 LASSEN AVE	056040024	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
24	1406 LASSEN AVE	056040035	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
25	401 IMPERIAL AVE	056047020	0.22	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
26	909 DOVER AVE	086004052	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
27	1511 CROWS LANDING RD	056011028	0.77	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current
28	1627 CROWS LANDING RD	056017021	2.03	Commercial	C-2	MU	25	40	Yes	Low Resource	YES - Current
29	1715 CROWS LANDING RD	056018002	0.93	Commercial	C-2	MU	25	18	Yes	Low Resource	YES - Current
30	1943 CROWS LANDING RD	056048052	0.75	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
31	1540 CROWS LANDING RD	086010034	0.82	Vacant	C-2	MU	25	16	Yes	Low Resource	YES - Current
32	TUCSON AVE	056032069	4.32	Vacant	R-1	R-3	25	86	Yes	Low Resource	YES - Current
33	TUCSON AVE	056033049	7.12	Vacant	R-1	R-3	25	142	Yes	Low Resource	YES - Current
34	LASSEN & MARIN AVE	056034001	5.10	Vacant	R-1	R-3	25	102	Yes	Low Resource	YES - Current
35	LASSEN & INYO AVE	056035001	5.55	Vacant	R-1	R-3	25	111	Yes	Low Resource	YES - Current
36	YUMA & TUCSON AVE	056036036	2.28	Vacant	R-1	R-3	25	45	Yes	Low Resource	YES - Current

Figure 5-3 Sites Identified in Bret Harte



5.4.3 Crows Landing

Crows Landing is a small community located where State Route 33 intersects with Fink Road/Crows Landing Road in southwest Stanislaus County. The majority of the community is zoned for agriculture, with some commercial, industrial, and rural residential zones. All sites identified for the inventory are vacant parcels in the rural residential zone. Water is provided by the Crows Landing Community Services District, and sewage is handled by individual septic systems. Table 5-13 summarizes available capacity in Crow's Landing and Table 5-14 details all residential sites in this area.

Table 5-13 Residential Capacity in Crow's Landing

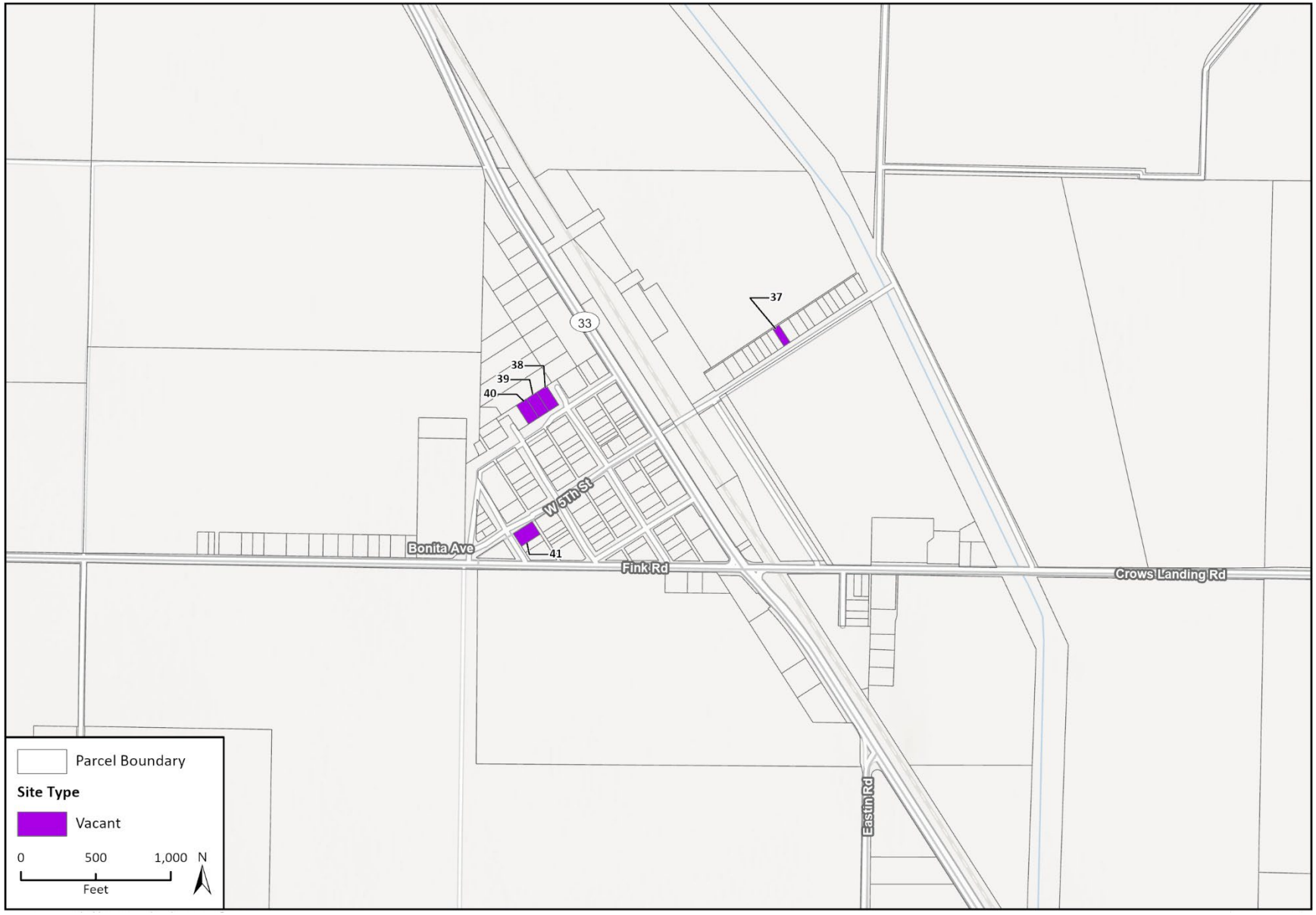
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	5	1.34	0	0	5	5
Rezoned Sites	0	0.00	0	0	0	0
Total	**5**	**1.34**	**0**	**0**	**0**	**5**

Due to the age and limited capacity of the existing water system and the lack of adequate sewer service for additional multifamily development in Crows Landing, no sites are proposed for rezoning. The Sites Inventory identified five vacant rural residential properties in the area suitable for the development of five housing units, as shown in Figure 5-4. All five units are assigned to the above moderate-income category. No sites are identified for rezone in this community. The County did not assume any lower-income units in this community due to small parcel size and lower TCAC opportunity category scores of identified sites. The TCAC Resource categories for the sites in this community are Low.

Table 5-14 Residential Sites in Crows Landing

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
37	E 5TH ST	027005011	0.16	Vacant	R-A	No Change	2.2	1	No	Low Resource	YES - Potential
38	4TH ST	027011003	0.28	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential
39	4TH ST	027011004	0.28	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential
40	4TH ST	027011005	0.28	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential
41	I ST	027014011	0.34	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential

Figure 5-4 Sites Identified in Crow's Landing



5.4.4 Del Rio

Del Rio is a community located in north-central Stanislaus County. Residential developments are a combination of planned developments and large, Rural Residential-zoned lots. Water is provided by the Del Este/City of Modesto system. There is no community sewer system, but some individual package treatment plants exist. Table 5-15 summarizes available capacity in Del Rio and Table 5-16 details all residential sites in this area.

Table 5-15 Residential Capacity in Del Rio

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	57	114.35	0	0	131	131
Rezoned Sites	0	0.00	0	0	0	0
Total	**57**	**114.35**	**0**	**0**	**131**	**131**

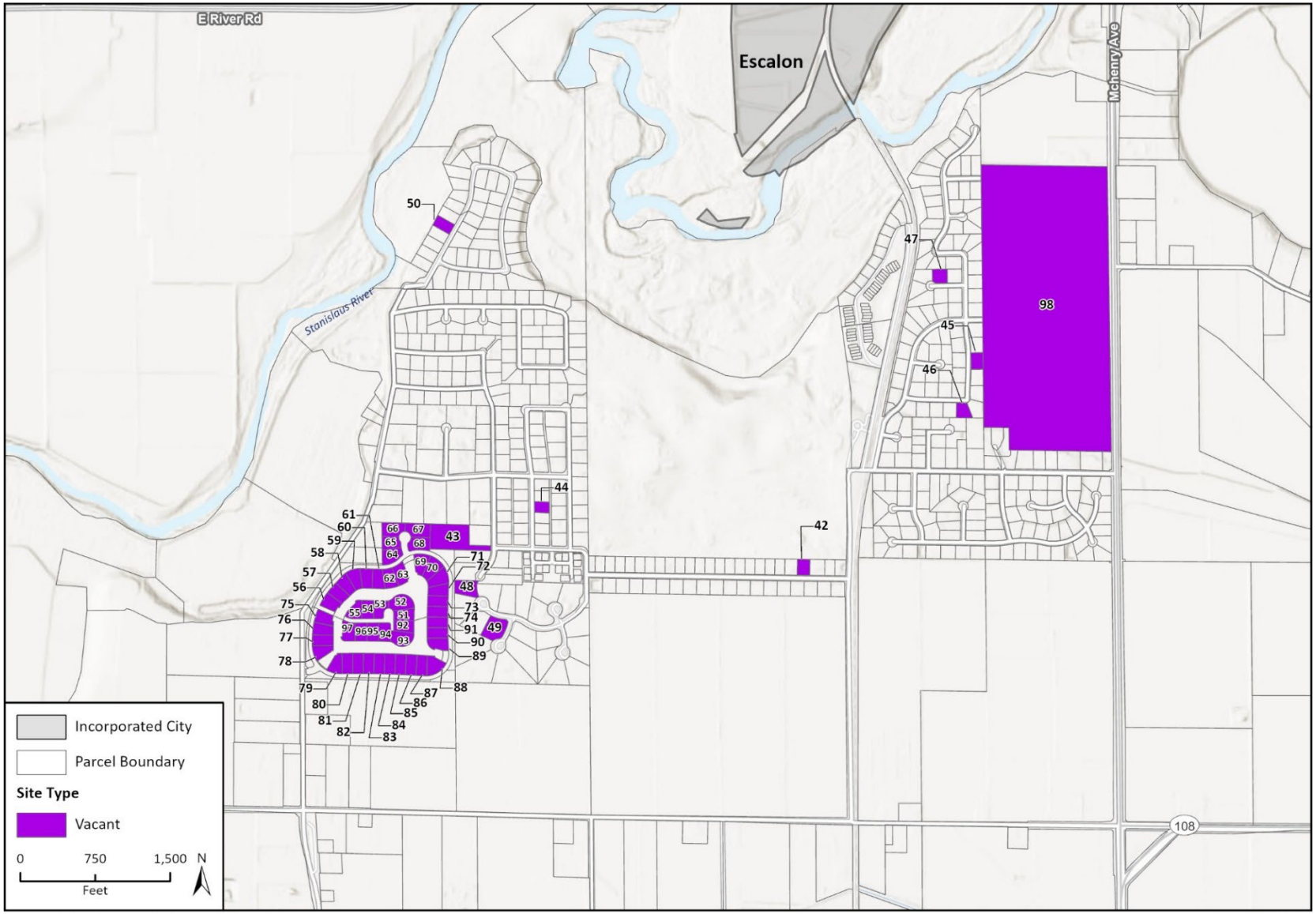
Due to limited sewer capacity, only rural residential development is proposed in the Del Rio area. The Sites Inventory identified 114.35 acres of vacant land across 57 sites in the Del Rio community, as shown in Figure 5-5 which can accommodate 131 housing units. All 131 units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning of the identified sites. The TCAC Resource categories for the sites in this community are Moderate.

Table 5-16 Residential Sites in Del Rio

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
42	0 COUNTRY CLUB DR	004007051	0.46	Vacant	R-1	No Change	8.7	2	No	Moderate Resource	YES - Potential
43	HILLCREST DR	004059055	2.52	Vacant	R-A	No Change	5.4	8	No	Moderate Resource	YES - Potential
44	OAKMONT DR	004078015	0.38	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Potential
45	SPY GLASS DR	004085020	0.46	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Potential
46	7116 SPY GLASS DR	004085024	0.46	Vacant	R-A	No Change	2.2	1	No	Moderate Resource	YES - Potential
47	ATHERTON CT	004086026	0.47	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Potential
48	AVENIDA DEL RIO	004088004	0.79	Vacant	R-A	No Change	2.2	1	No	Moderate Resource	YES - Potential
49	CORTE DE ORO	004088007	1.00	Vacant	R-A	No Change	5.4	3	No	Moderate Resource	YES - Potential
50	7409 RIVER NINE DR	004093005	0.49	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
51	0 ISLE DR	004100001	0.53	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
52	0 ISLE DR	004100002	0.74	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
53	0 ISLE DR	004100003	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
54	0 ISLE DR	004100004	0.5	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
55	0 ISLE DR	004100005	0.5	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
56	0 LAGO CIR	004100006	0.52	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
57	0 LAGO CIR	004100007	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
58	0 LAGO CIR	004100008	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
59	0 LAGO CIR	004100009	0.52	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
60	0 LAGO CIR	004100010	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
61	0 LAGO CIR	004100011	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
62	0 LAGO CIR	004100012	0.54	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
63	0 LAGO CIR	004100013	0.55	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
64	0 MONUMENT CT	004100014	0.62	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
65	0 MONUMENT CT	004100015	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
66	0 MONUMENT CT	004100016	0.68	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
67	0 MONUMENT CT	004100017	0.75	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
68	0 MONUMENT CT	004100018	0.64	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
69	0 LAGO CIR	004100019	0.57	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
70	0 LAGO CIR	004100020	0.62	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
71	0 LAGO CIR	004100021	0.60	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
72	0 LAGO CIR	004100022	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
73	0 LAGO CIR	004100023	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
74	0 LAGO CIR	004100024	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
75	0 LAGO CIR	004101001	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
76	0 LAGO CIR	004101002	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
77	0 LAGO CIR	004101003	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
78	0 LAGO CIR	004101004	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
79	0 LAGO CIR	004101005	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
80	0 LAGO CIR	004101006	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
81	0 LAGO CIR	004101007	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
82	0 LAGO CIR	004101008	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
83	0 LAGO CIR	004101009	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
84	0 LAGO CIR	004101010	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
85	0 LAGO CIR	004101011	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
86	0 LAGO CIR	004101012	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
87	0 LAGO CIR	004101013	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
88	0 LAGO CIR	004101014	0.61	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
89	0 LAGO CIR	004101015	0.53	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
90	0 LAGO CIR	004101016	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
91	0 LAGO CIR	004101017	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
92	0 ISLE DR	004101018	0.53	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
93	0 ISLE DR	004101019	0.67	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
94	0 ISLE DR	004101020	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
95	0 ISLE DR	004101021	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
96	0 ISLE DR	004101022	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
97	0 ISLE DR	004101023	0.57	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
98	7111 MC HENRY AVE	004102005	81.90	Vacant	P-D	No Change	PD	65	No	Moderate Resource	YES - Potential

Figure 5-5 Sites Identified in Del Rio



5.4.5 Denair

Denair is a small community located east of Turlock. The majority of the community is zoned for residential and general agriculture, with increased densities concentrated around the commercial core along Main Street. All sites identified in the inventory are located within vacant parcels in the rural residential zone. Water and sewer service is provided by the Denair Community Services District. Table 5-17 summarizes available capacity in Denair and Table 5-16 details all residential sites in this area.

Table 5-17 Residential Capacity in Denair

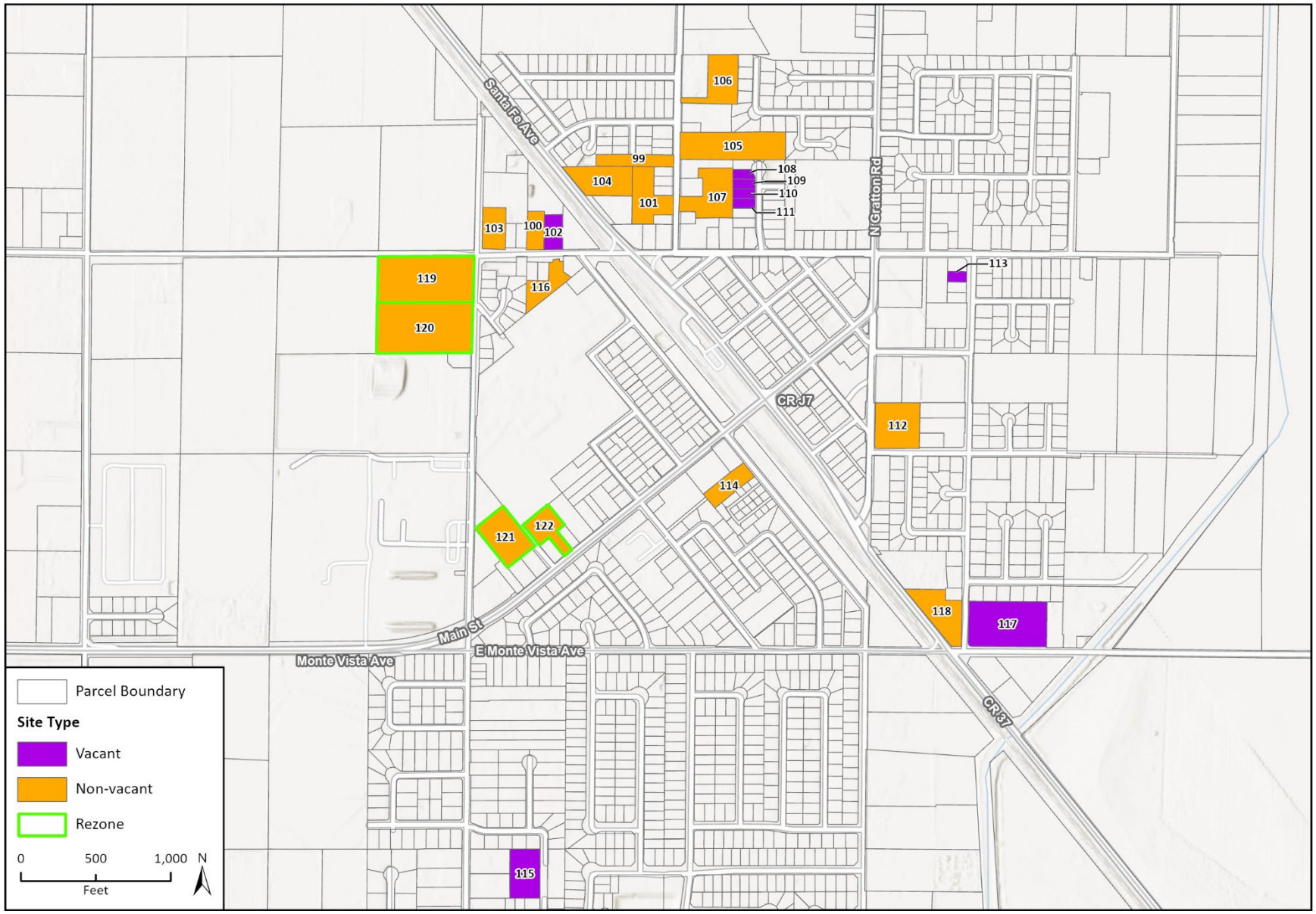
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	20	25.53	0	26	68	94
Rezoned Sites	4	12.41	127	13	0	140
Total	**24**	**37.94**	**127**	**39**	**68**	**234**

The Sites Inventory identified 20 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 94 housing units. Four properties totaling approximately 12 acres of land in Denair will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 140 housing units. Sites identified in Denair to accommodate a total of 234 housing units are shown in Figure 5-6). Of these 234 units, 127 units are assigned to the lower-income category, 39 units are assigned to the moderate-income category and 68 units are assigned to the above moderate-income category. Larger sites (i.e., between one and five acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community Low, Moderate, High, and Highest.

Table 5-18 Residential Sites in Denair

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
99	4141 SPERRY RD	024014007	0.96	Single Family W/Extra Land	R-A	No Change	5.4	2	No	Moderate Resource	YES - Current
100	4109 ZEERING RD	024015003	0.68	Single Family W/Extra Land	R-2	No Change	14	4	No	Highest Resource	YES - Current
101	4109 SPERRY RD	024015010	1.67	Single Family W/Extra Land	R-A	No Change	5.4	4	No	Moderate Resource	YES - Current
102	4125 ZEERING RD	024015024	0.67	Vacant	R-2	No Change	14	7	No	Highest Resource	YES - Current
103	4009 ZEERING RD	024015026	0.99	Single Family W/Extra Land	R-2	No Change	14	5	No	Highest Resource	YES - Current
104	4140 N SANTA FE AVE	024015028	1.76	Single Family W/Extra Land	R-A	No Change	5.4	5	No	Moderate Resource	YES - Current
105	4216 SPERRY RD	024016004	2.99	Single Family W/Extra Land	R-A	No Change	5.4	9	No	Moderate Resource	YES - Current
106	4308 SPERRY RD	024016009	1.69	Single Family W/Extra Land	R-A	No Change	5.4	5	No	Moderate Resource	YES - Current
107	4100 SPERRY RD	024017003	2.00	Single Family W/Extra Land	R-A	No Change	5.4	6	No	Moderate Resource	YES - Current
108	4105 CHICA AVE	024017034	0.21	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
109	4101 CHICA AVE	024017035	0.22	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
110	4021 CHICA AVE	024017036	0.22	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
111	4017 CHICA AVE	024017037	0.22	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
112	3640 GRATTON RD	024024016	2.10	Single Family W/Extra Land	R-A	No Change	5.4	6	No	Low Resource	YES - Current
113	3911 STORY RD	024024040	0.21	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Current
114	3613 MERCED AVE	024031035	0.95	Single Family W/Extra Land	R-3	No Change	25	9	No	Highest Resource	YES - Current
115	0 DERR RD	024050026	1.53	Vacant	R-A	No Change	5.4	5	No	High Resource	YES - Current
116	4124 E ZEERING RD	024059019	1.04	Single Family W/Extra Land	R-2	No Change	14	6	No	Highest Resource	YES - Current
117	3252 STORY RD	024053041	3.62	Vacant	R-A	No Change	5.4	12	No	Low Resource	YES - Current
118	3225 STORY RD	024025004	1.80	Single Family W/Extra Land	R-A	No Change	5.4	4	No	Low Resource	YES - Current
119	3833 LESTER RD	024012004	4.52	Single Family W/Extra Land	R-A	R-3	25	45	Yes	Highest Resource	YES - Current
120	3817 LESTER RD	024012005	4.94	Single Family W/Extra Land	R-A	R-3	25	49	Yes	Highest Resource	YES - Current
121	3325 KERN ST	024033002	1.84	Single Family W/Extra Land	R-A	R-3	25	29	Yes	Highest Resource	YES - Current
122	4165 MAIN ST	024033026	1.11	Single Family W/Extra Land	R-A	R-3	25	17	Yes	Highest Resource	YES - Current

Figure 5-6 Sites Identified in Denair



5.4.6 Diablo Grande

Diablo Grande is a developing master-planned community in the hills southwest of Patterson. The sites identified in this cycle are in the northeast corner of the community. Household water and sewer utilities are provided by the Western Hills Water District. Table 5-19 summarizes available capacity in Diablo Grande and Table 5-20 details all residential sites in this area.

Table 5-19 Residential Capacity in Diablo Grande

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

The Sites Inventory identified 112 vacant properties in Diablo Grande suitable for the development of 112 housing units during this housing cycle as shown in Figure 5-7. All 112 units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning, lower TCAC opportunity category scores, and environmental constraints of the identified sites. The TCAC Resource categories for the sites in this community are Low.

Table 5-20 Residential Sites in Diablo Grande

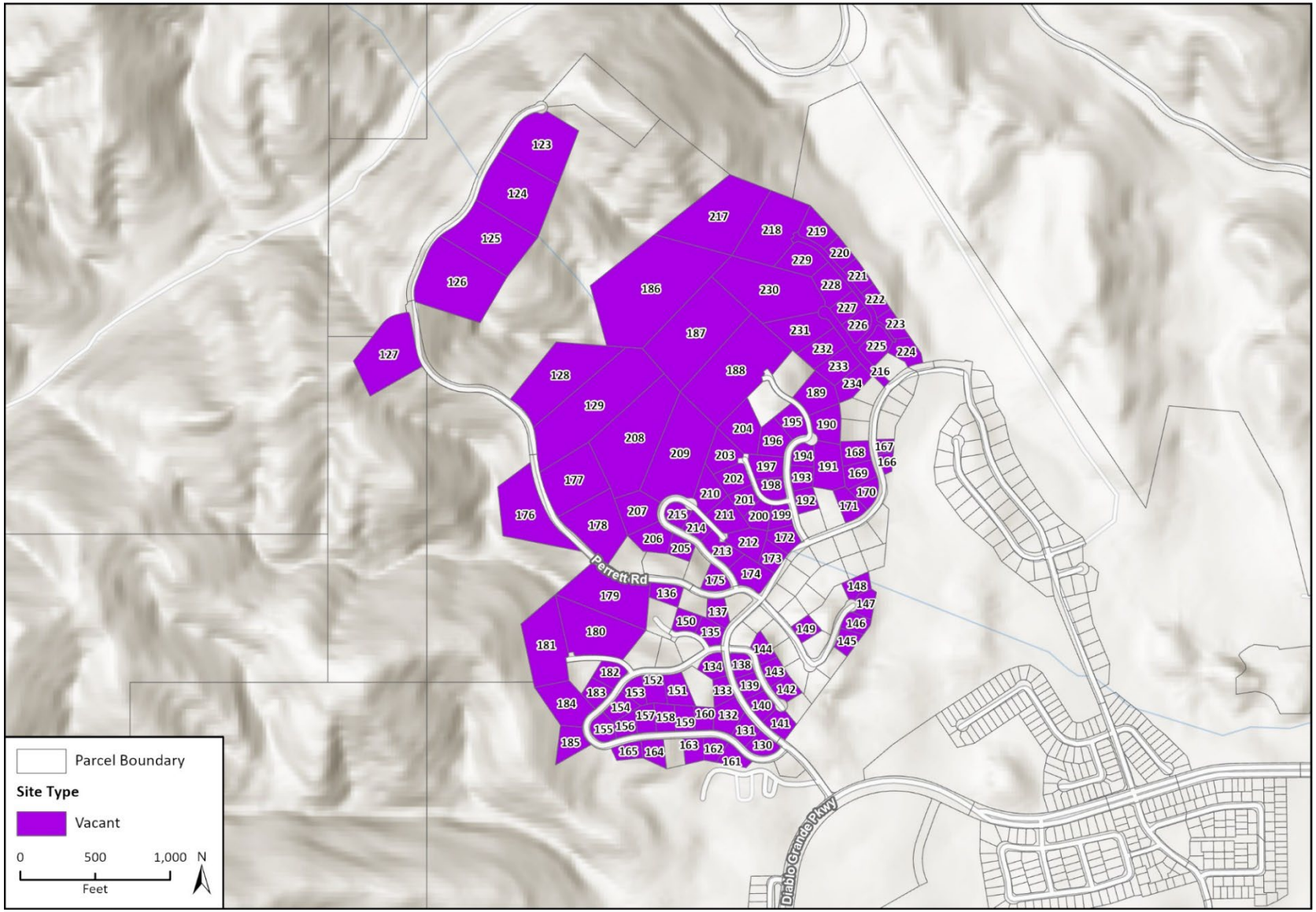
Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
123	0 PERRETT RD	025023003	3.45	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
124	0 PERRETT RD	025023004	3.99	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
125	0 PERRETT RD	025023005	3.68	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
126	0 PERRETT RD	025023006	4.95	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
127	0 PERRETT RD	025023007	3.41	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
128	0 PERRETT RD	025023009	4.39	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
129	0 PERRETT RD	025023010	6.71	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
130	20780 MORTON DAVIS CIR	025025002	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
131	9451 MORTON DAVIS DR	025025003	0.51	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
132	20740 MORTON DAVIS DR	025025004	0.80	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
133	9421 MORTON DAVIS DR	025025005	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
134	20420 MORTON DAVIS DR	025025006	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
135	0 MORTON DAVIS DR	025025007	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
136	9460 PERRETT RD	025025008	0.60	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
137	0 PERRETT RD	025025010	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
138	0 RUSS CT	025025012	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
139	0 RUSS CT	025025013	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
140	0 RUSS CT	025025014	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
141	0 RUSS CT	025025015	0.59	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
142	9321 RUSS CT	025025017	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
143	9341 RUSS CT	025025018	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
144	9361 RUSS CT	025025019	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
145	9240 FOXY CT	025025027	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
146	9220 FOXY CT	025025028	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
147	9200 FOXY CT	025025029	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
148	9201 FOXY CT	025025030	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
149	9321 FOXY CT	025025034	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
150	9541 BOAR HEAD LN	025025047	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
151	20460 MORTON DAVIS CIR	025025053	0.76	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
152	20480 MORTON DAVIS CIR	025025054	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
153	20500 MORTON DAVIS CIR	025025055	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
154	20520 MORTON DAVIS CIR	025025056	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
155	0 MORTON DAVIS CIR	025025057	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
156	20600 MORTON DAVIS CIR	025025058	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
157	20620 MORTON DAVIS CIR	025025059	0.54	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
158	20640 MORTON DAVIS CIR	025025060	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
159	20660 MORTON DAVIS CIR	025025061	0.50	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
160	20700 MORTON DAVIS CIR	025025062	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
161	0 MORTON DAVIS CIR	025025063	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
162	20739 MORTON DAVIS CIR	025025064	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
163	20661 MORTON DAVIS CIR	025025065	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
164	20621 MORTON DAVIS CIR	025025067	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
165	20601 MORTON DAVIS CIR	025025068	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
166	0 MORTON DAVIS DR	025026008	0.24	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
167	0 MORTON DAVIS DR	025026009	0.25	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
168	0 MORTON DAVIS DR	025026019	0.66	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
169	0 MORTON DAVIS DR	025026020	0.66	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
170	0 MORTON DAVIS DR	025026021	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
171	0 MORTON DAVIS DR	025026022	0.67	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
172	0 MORTON DAVIS DR	025026025	0.63	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
173	0 MORTON DAVIS DR	025026026	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
174	0 MORTON DAVIS DR	025026027	0.98	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
175	0 PERRETT RD	025026028	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
176	0 PERRETT RD	025027001	3.34	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
177	0 PERRETT RD	025027002	3.03	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
178	0 PERRETT RD	025027003	2.82	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
179	0 PERRETT RD	025027008	3.33	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
180	9661 SCHNEIDER LN	025027012	3.34	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
181	9691 SCHNEIDER LN	025027013	3.03	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
182	9600 SCHNEIDER LN	025027015	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
183	20521 MORTON DAVIS CIR	025027016	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
184	20541 MORTON DAVIS CIR	025027017	1.66	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
185	20561 MORTON DAVIS CIR	025027018	0.83	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
186	0 GRIFFITHS CT	025028007	9.12	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
187	0 GRIFFITHS CT	025028008	5.88	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
188	20081 GRIFFITHS CT	025028009	5.85	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
189	20120 GRIFFITHS CT	025028011	1.21	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
190	20140 GRIFFITHS CT	025028012	0.96	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
191	9461 GRIFFITHS CT	025028013	1.36	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
192	9321 GRIFFITHS LN	025028014	0.50	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
193	9411 GRIFFITHS LN	025028015	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
194	9431 GRIFFITHS LN	025028016	0.48	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
195	20121 GRIFFITHS LN	025028017	0.72	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
196	9440 GRIFFITHS LN	025028018	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
197	9420 GRIFFITHS LN	025028019	0.75	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
198	9400 GRIFFITHS LN	025028020	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
199	20281 DENIS LN	025028021	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
200	20261 DENIS LN	025028022	0.58	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
201	20241 DENIS LN	025028023	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
202	20221 DENIS LN	025028024	0.74	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
203	20201 DENIS LN	025028025	0.99	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
204	20200 DENIS LN	025028026	1.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
205	20401 PERRETT CT	025041001	0.48	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
206	20381 PERRETT CT	025041002	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
207	20371 PERRETT CT	025041003	1.35	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
208	20351 PERRETT CT	025041004	5.65	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
209	20341 PERRETT CT	025041005	4.76	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
210	20331 PERRETT CT	025041006	0.94	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
211	20321 PERRETT CT	025041007	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
212	20301 PERRETT CT	025041008	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
213	0 PERRETT CT	025041009	0.72	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
214	20340 PERRETT CT	025041010	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
215	0 PERRETT CT	025041011	0.48	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
216	0 WILD BOAR PL	025042002	1.77	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
217	19960 BOAR LN	025042004	4.88	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
218	20000 BOAR LN	025042005	3.29	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
219	20010 BOAR LN	025042006	0.89	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
220	20040 BOAR LN	025042007	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
221	20030 BOAR LN	025042008	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
222	20040 BOAR LN	025042009	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
223	9222 BOAR CT	025042010	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
224	9201 BOAR CT	025042011	0.65	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
225	9220 BOAR CT	025042012	0.77	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
226	9351 WILD BOAR PL	025042013	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
227	20035 WILD BOAR PL	025042014	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
228	20025 WILD BOAR PL	025042015	1.00	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
229	20015 WILD BOAR PL	025042016	1.14	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
230	9390 WILD BOAR PL	025042017	4.67	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
231	9370 WILD BOAR PL	025042018	1.57	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
232	9350 WILD BOAR PL	025042019	1.01	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
233	9340 WILD BOAR PL	025042020	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
234	9320 WILD BOAR PL	025042021	0.75	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Figure 5-7 Sites Identified in Diablo Grande



5.4.7 Empire

Empire is a community adjacent to the eastern boundary of the City of Modesto. The majority of the community is zoned for residential uses, with commercial uses concentrated along Yosemite Boulevard and Santa Fe Avenue. Water and sewer service is provided by the City of Modesto. Table 5-21 summarizes available capacity in Empire and Table 5-22 details all residential sites in this area.

Table 5-21 Residential Capacity in Empire

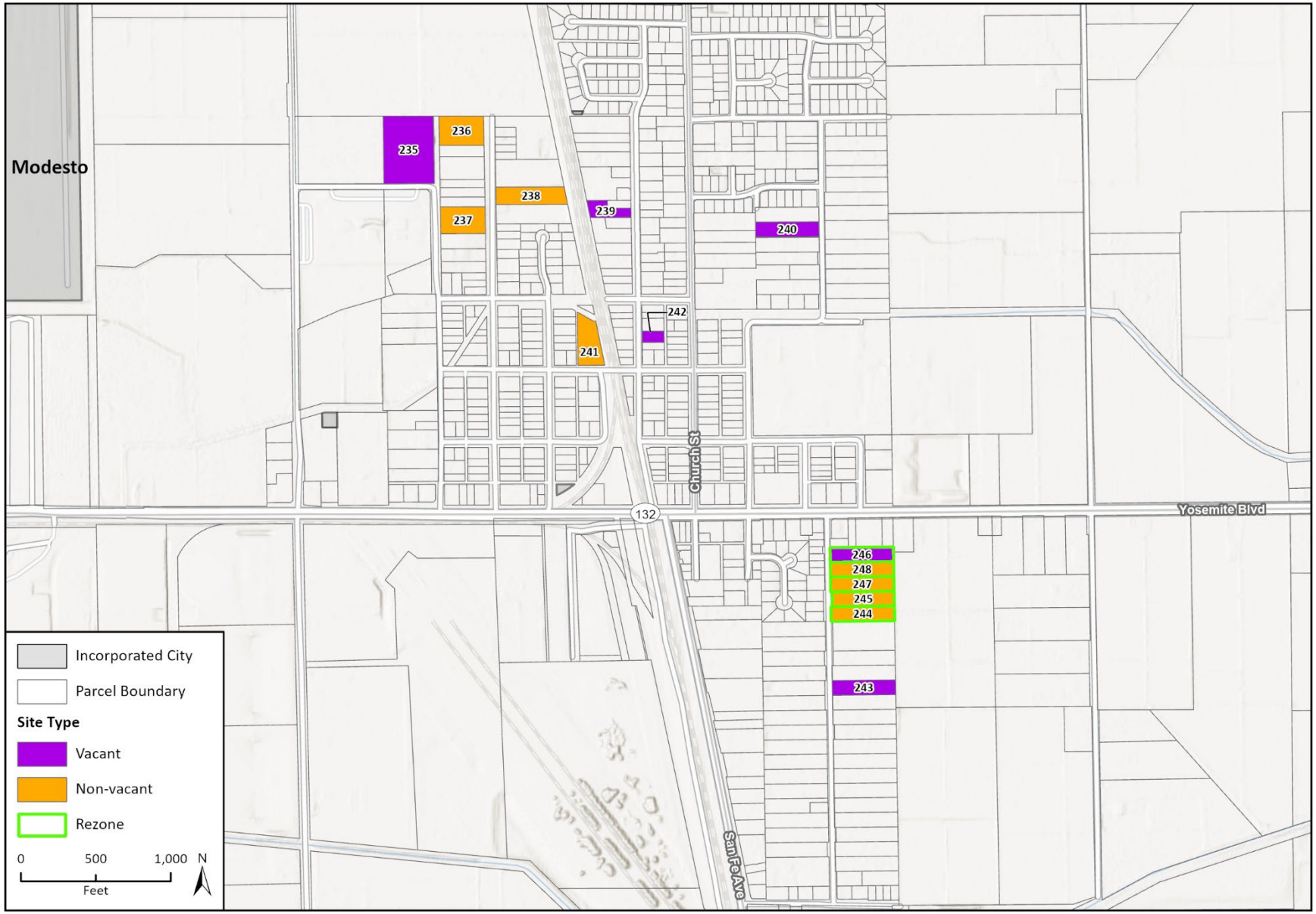
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	9	11.11	0	0	35	35
Rezoned Sites	5	4.77	17	46	8	71
Total	**14**	**15.88**	**17**	**46**	**43**	**106**

The Sites Inventory identified nine vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 35 housing units. Five parcels along Abbie Street with vacant land suitable for subdivision will be rezoned to allow residential development at 25 dwelling units per acre facilitating an estimated 71 housing units; one of the parcels identified for rezone is owned by the County and is currently vacant. Sites identified in Empire to accommodate a total of 106 housing units are shown in Figure 5-8. Of these 106 units, 17 units are assigned to the lower-income category, 46 units are assigned to the moderate-income category and 43 units are assigned to the above moderate-income category. Larger sites (i.e., between one and four acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

Table 5-22 Residential Sites in Empire

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
235	FRAZINE RD	133001014	3.48	Vacant	R-A	No Change	5.4	11	No	Low Resource	YES - Current
236	451 B ST	133002001	1.33	Single Family W/Extra Land	R-A	No Change	5.4	2	No	Low Resource	YES - Current
237	401 B ST	133002018	1.23	Single Family W/Extra Land	R-1	No Change	8.7	6	No	Low Resource	YES - Current
238	420 B ST	133003007	1.24	Single Family W/Extra Land	R-A	No Change	5.4	3	No	Low Resource	YES - Current
239	401 E ST	133004039	0.56	Vacant	R-1	No Change	8.7	3	No	Low Resource	YES - Current
240	343 N ABBIE ST	133005008	0.96	Vacant	R-A	No Change	5.4	3	No	Low Resource	YES - Current
241	4841 2ND ST	133007045	1.10	Single Family W/Extra Land	R-1	No Change	8.7	5	No	Low Resource	YES - Current
242	E ST	133008027	0.25	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
243	0 S ABBIE ST	133017065	0.96	Vacant	R-A	No Change	2.2	1	No	Low Resource	YES - Current
244	124 S ABBIE ST	133017002	0.96	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
245	114 S ABBIE ST	133017003	0.93	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
246	18 S ABBIE ST	133017006	0.96	Vacant	R-A	R-3	25	19	Yes	Low Resource	YES - Current
247	100 S ABBIE ST	133017004	0.96	Multi-family w/ Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
248	32 S ABBIE ST	133017005	0.96	Multi-family w/ Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current

Figure 5-8 Sites Identified in Empire



5.4.8 Grayson

Grayson is a small community located northeast of the intersection of Highway 33 and Grayson Road, in the western portion of Stanislaus County. The majority of the community is zoned single-family residential. The City of Modesto serves Grayson with household water and the Grayson Community Service District provides sewer service. The City of Modesto is upgrading and expanding the aging potable water infrastructure in Grayson and anticipates completion of capital improvements by the end of 2025. Table 5-23 summarizes available capacity in Grayson and Table 5-24 details all residential sites in this area.

Table 5-23 Residential Capacity in Grayson

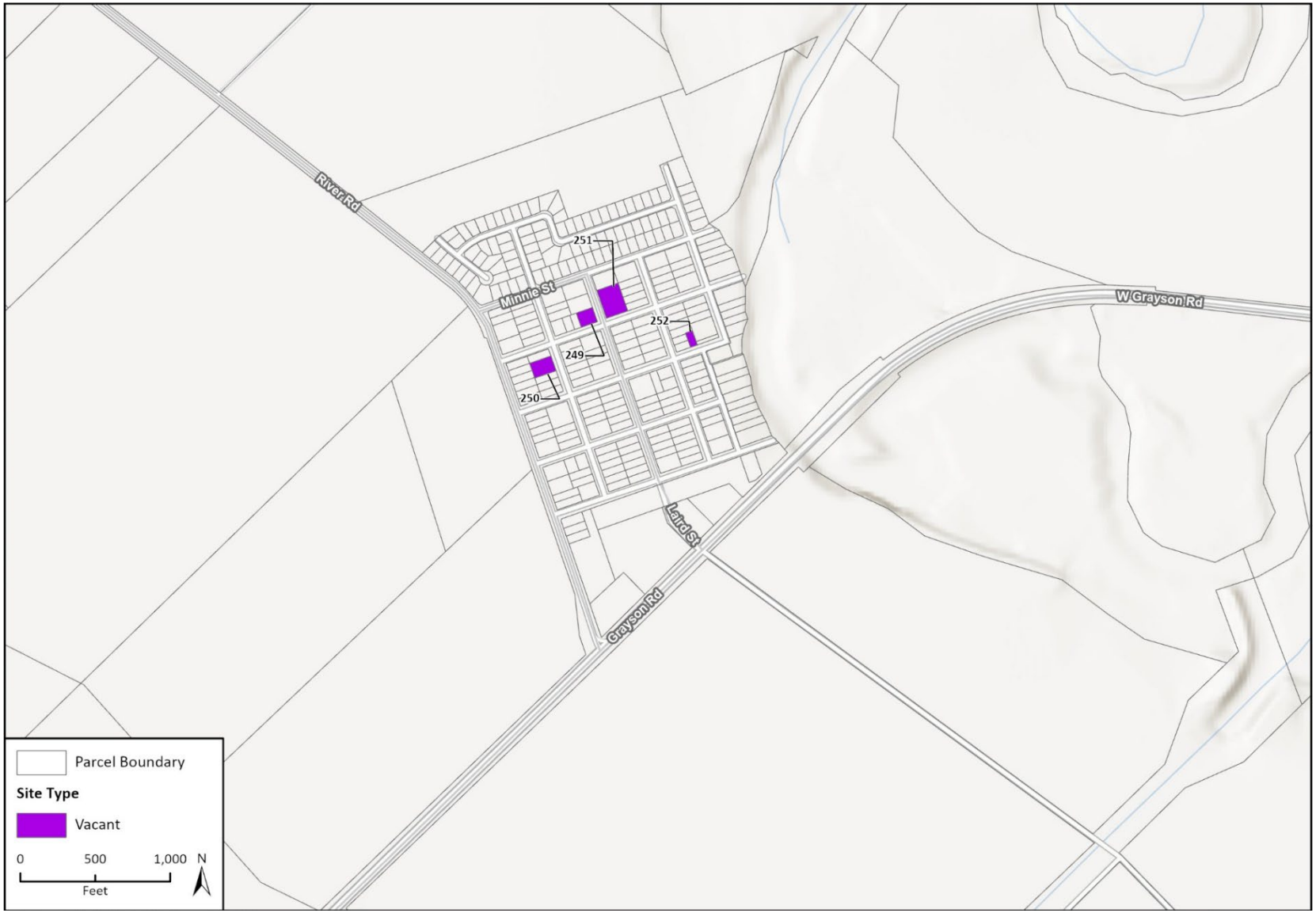
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	4	1.41	0	0	6	6
Rezoned Sites	0	0.00	0	0	0	0
Total	**4**	**1.41**	**0**	**0**	**6**	**6**

Due to the age and limited capacity the existing sewer system for additional multifamily development in Grayson, no sites are proposed for rezoning. The Sites Inventory identified 1.41 acres of vacant land zoned for single-family residential suitable to accommodate six housing units on four sites. Figure 5-9 shows sites identified in Grayson. All six units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning and lower TCAC opportunity category scores of the identified sites. The TCAC Resource categories for the sites in this community are Low.

Table 5-24 Residential Sites in Grayson

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
249	8517 LAIRD ST	016027003	0.26	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential
250	8609 WILSON ST	016027021	0.36	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential
251	8512 LAIRD ST	016028002	0.68	Vacant	R-1	No Change	8.7	3	No	Low Resource	YES - Potential
252	0 AMELIA ST	016028059	0.11	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential

Figure 5-9 Sites Identified in Grayson



5.4.9 Hickman

Hickman is a small community located just south of Waterford. The community is mostly zoned for residential, planned development, or agricultural uses. The City of Waterford provides domestic water service and wastewater is handled by package treatment and individual septic systems. Table 5-25 summarizes available capacity in Hickman and Table 5-26 details all residential sites in this area.

Table 5-25 Residential Capacity in Hickman

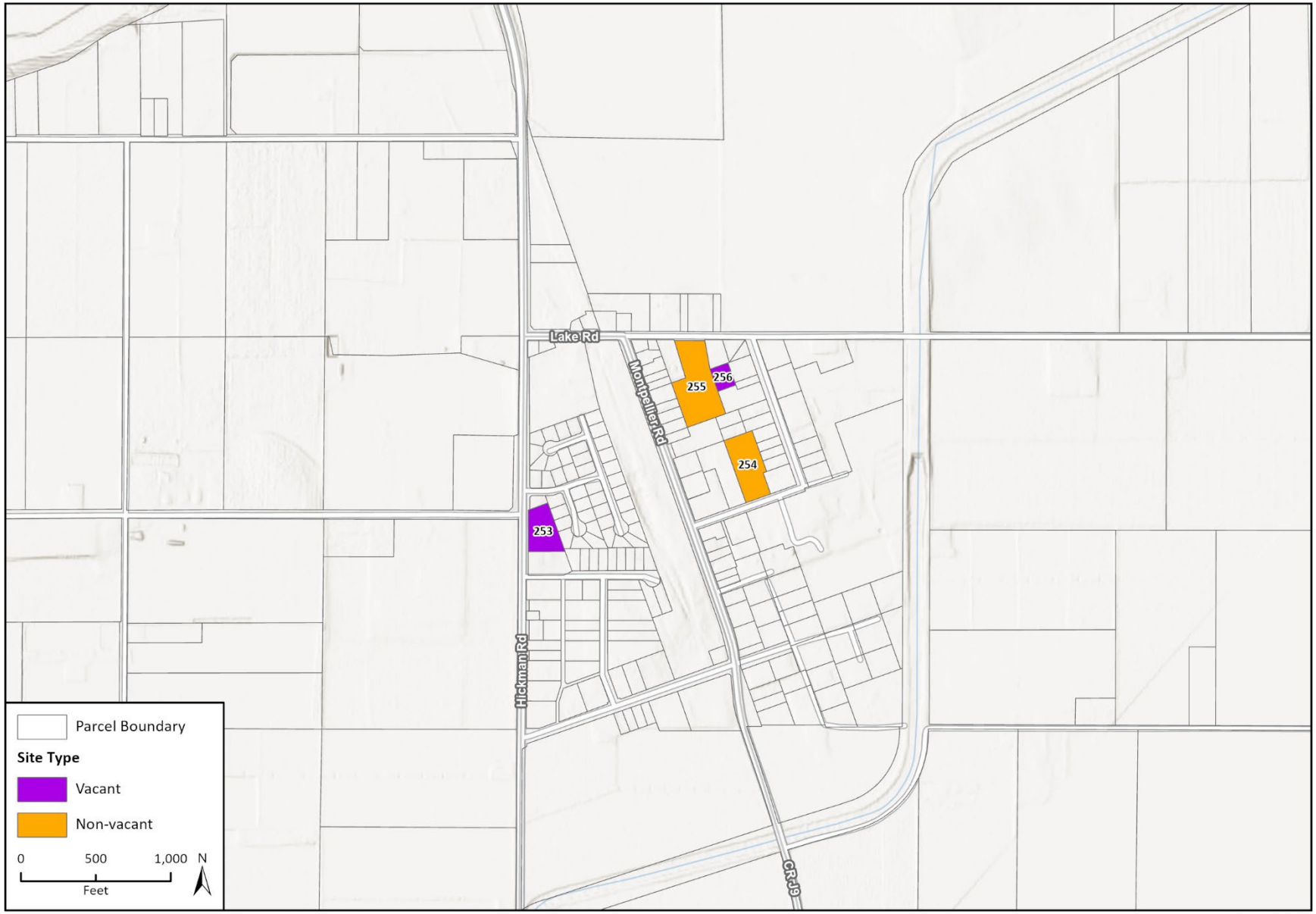
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	4	6.65	0	0	19	19
Rezoned Sites	0	0.00	0	0	0	0
Total	**4**	**6.65**	**0**	**0**	**19**	**19**

Due to limited sewer capacity, no rezoning is proposed in Hickman. The Sites Inventory identified 6.65 acres across four vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 19 housing units on four sites. Figure 5-10 shows sites identified in Hickman. All 19 units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning of the identified sites. The TCAC Resource categories for the sites in this community Low and High.

Table 5-26 Residential Sites in Hickman

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
253	910 HICKMAN RD	019042064	1.33	Vacant	R-1	No Change	8.7	7	No	High Resource	YES - Potential
254	13255 4TH ST	019045037	1.93	Single Family W/Extra Land	R-A	No Change	5.4	5	No	Low Resource	YES - Potential
255	13248 LAKE RD	019045056	2.93	Single Family W/Extra Land	R-A	No Change	5.4	6	No	Low Resource	YES - Potential
256	0 LAKE RD	019045057	0.46	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential

Figure 5-10 Sites Identified in Hickman



5.4.10 Keyes

Keyes is a community located east of State Route 99 between Ceres and Turlock. The majority of the community is zoned for single-family residential with a multifamily district along Anna Avenue and Highway Commercial along 7th Street. Keyes has both public water and sewer available through the Keyes Community Services District. Table 5-27 summarizes available capacity in Keyes and Table 5-28 details all residential sites in this area.

Table 5-27 Residential Capacity in Keyes

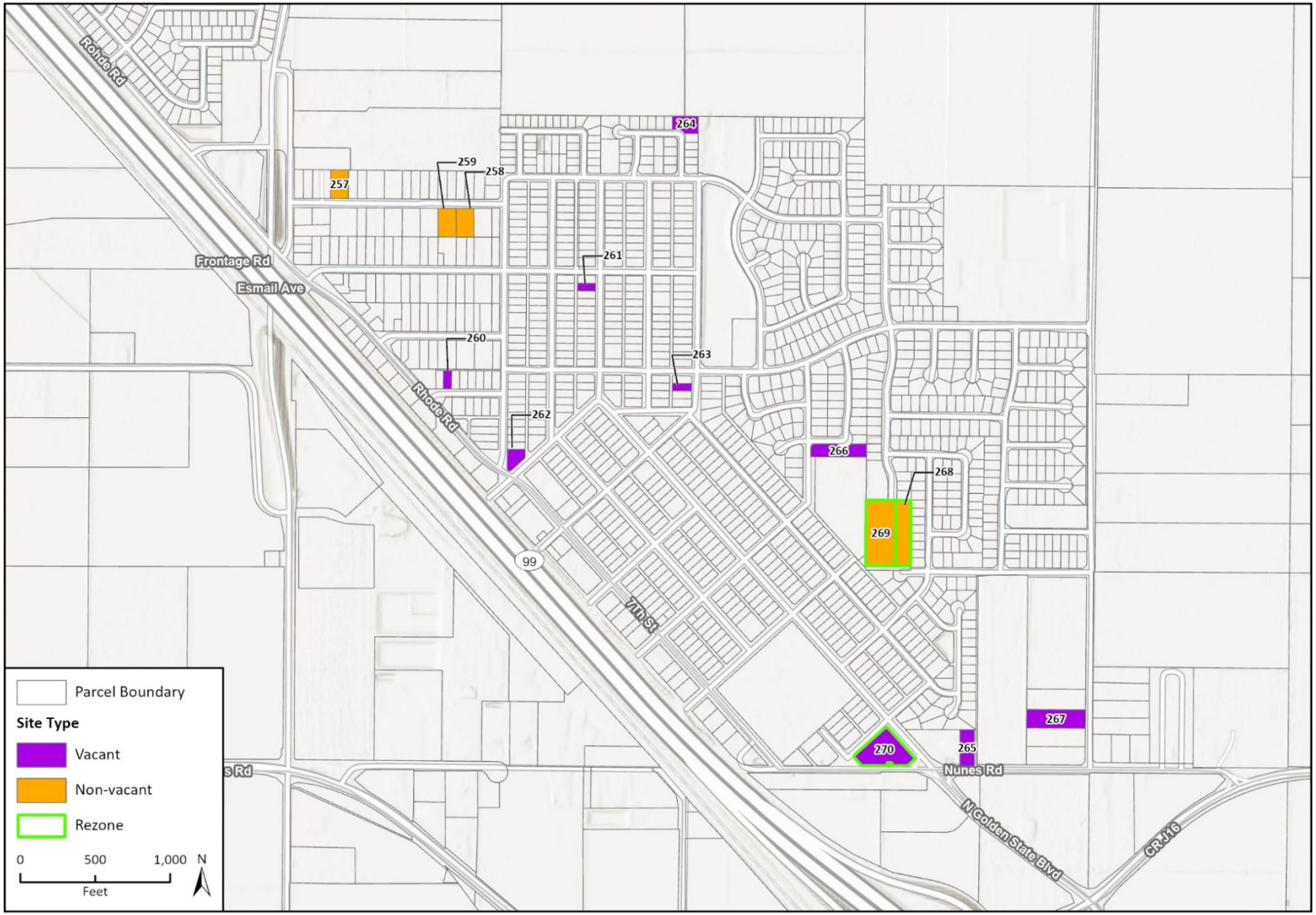
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	11	5.05	0	20	16	36
Rezoned Sites	3	4.45	58	18	2	78
Total	**14**	**9.5**	**58**	**38**	**18**	**114**

The Sites Inventory identified 11 vacant and single family home sites with significant undeveloped land suitable for subdivision to accommodate 36 housing units. Three properties totalling approximately four acres of land in Keyes will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 78 housing units. Including the proposed rezoning, an estimated 114 housing units are projected on the sites in Keyes shown in Figure 5-11. Of these 114 units, 58 units are assigned the lower-income category, 38 units are assigned to the moderate-income category and 18 units are assigned to the above moderate-income category. Larger sites (i.e., between one and two acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are High. Four sites do not have sufficient data to determine TCAC category.

Table 5-28 Residential Sites in Keyes

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
257	4021 ANNA AVE	045014004	0.52	Single Family W/Extra Land	R-3	No Change	25	6	No	High Resource	YES - Current
258	4212 ANNA AVE	045014015	0.52	Single Family W/Extra Land	R-3	No Change	25	5	No	Insufficient Data	YES - Current
259	4204 ANNA AVE	045014016	0.53	Single Family W/Extra Land	R-3	No Change	25	5	No	Insufficient Data	YES - Current
260	4205 LUCINDA AVE	045016004	0.15	Vacant	R-1	No Change	8.7	1	No	Insufficient Data	YES - Current
261	5305 9TH ST	045019014	0.14	Vacant	R-1	No Change	8.7	1	No	High Resource	YES - Current
262	4305 LIZZIE AVE	045020001	0.29	Vacant	R-1	No Change	8.7	1	No	Insufficient Data	YES - Current
263	5405 10TH ST	045020046	0.15	Vacant	R-1	No Change	8.7	1	No	High Resource	YES - Current
264	BLACKBERRY WAY	045064073	0.41	Vacant	R-1	No Change	8.7	2	No	High Resource	YES - Current
265	4821 NUNES RD	045065001	0.53	Vacant	R-3	No Change	25	8	No	High Resource	YES - Current
266	0 BRIANNA AVE	045066059	0.70	Vacant	R-1	No Change	8.7	3	No	High Resource	YES - Current
267	5911 WASHINGTON RD	045071002	1.11	Vacant	R-A	No Change	5.4	3	No	High Resource	YES - Current
268	4701 NORMA WAY	045021019	1.00	Single Family W/Extra Land	R-1	R-3	25	14	Yes	High Resource	YES - Current
269	4701 MAUD AVE	045021020	2.00	Single Family W/Extra Land	R-1	R-3	25	35	Yes	High Resource	YES - Current
270	0 9TH ST	045033007	1.45	Vacant	H-1	R-3	25	29	Yes	Insufficient Data	YES - Current

Figure 5-11 Sites Identified in Keyes



5.4.11 North Ceres

North Ceres is an urbanized area adjacent to the northern boundary of the City of Ceres within the City's sphere of influence. The Sites Inventory groups together the Bystrom, Ceres-River Road, Hatch/Stonum, and Ceres/Herndon neighborhoods into the "North Ceres" area. Water service is provided to portions of the unincorporated North Ceres area by both the cities of Modesto and Ceres and sewer service by the City of Ceres. The area is bordered along the north by the Tuolumne River Regional Park (TRRP), 100 acres of parkland that runs along seven river miles of the Tuolumne River. The South Ceres area connects to the City of Modesto via the 9th Street Bridge which is a gateway into Modesto's downtown. Stanislaus County has been awarded a Caltrans Sustainable Transportation Planning Grant for the 9th Steet Corridor to address problems with land use compatibility, pedestrian/bike access (lack of sidewalks and bike lanes), and stormwater facilities improvements. The planning effort will include opportunities for expand residential units within the corridor area. Table 5-29 summarizes available capacity in the North Ceres neighborhood and Table 5-30 details all residential sites in this area.

Table 5-29 Residential Capacity in North Ceres

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	18	9.36	0	39	25	64
Rezoned Sites	4	7.97	97	18	1	116
Total	**22**	**17.33**	**97**	**57**	**26**	**180**

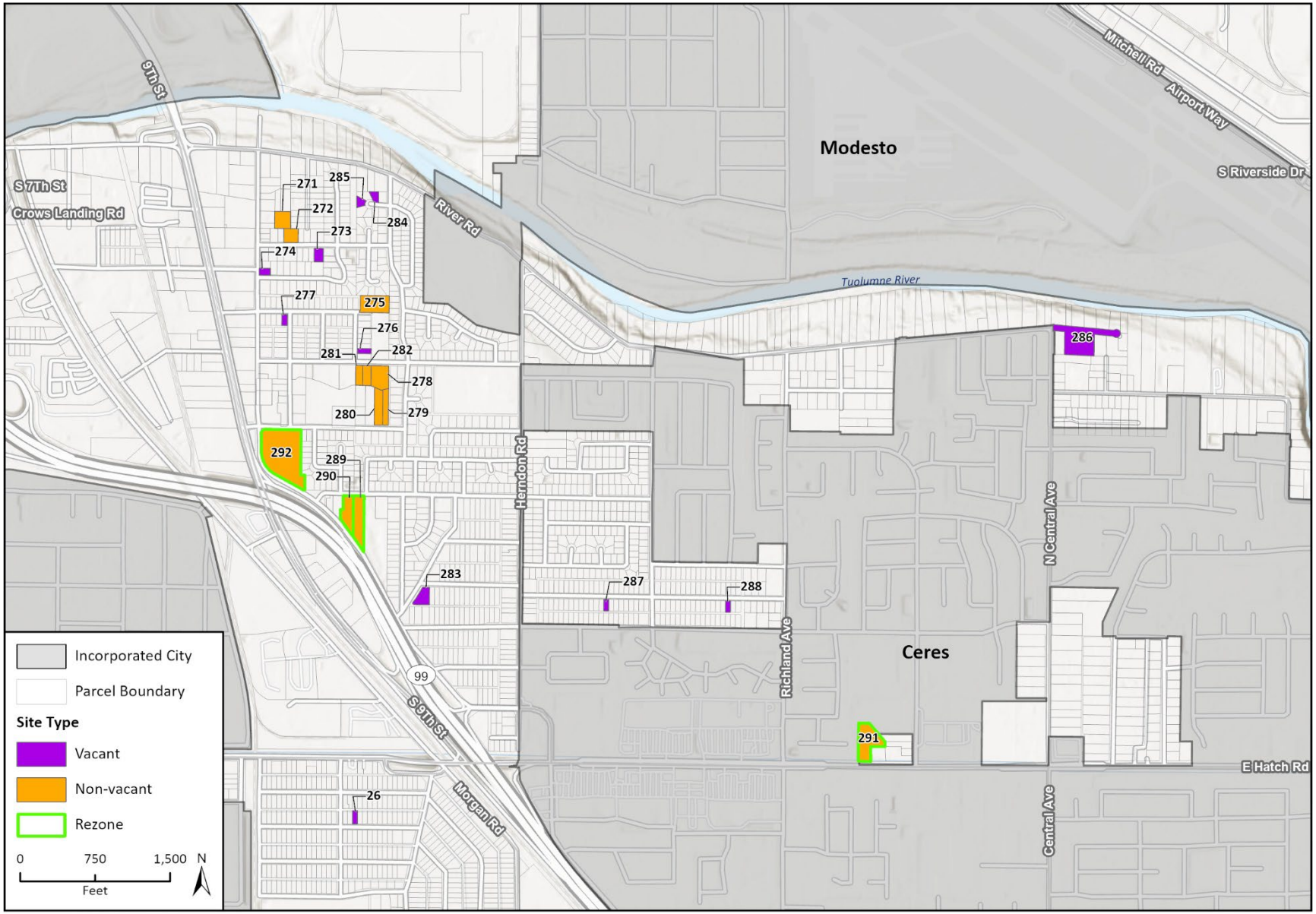
The Sites Inventory identified 22 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 64 housing units. Many of these sites are small and already zoned for multifamily residential. Four properties totaling approximately 8 acres of land in North Ceres will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 116 housing units. Including the proposed rezoning, an estimated 180 housing units are projected on the sites in North Ceres shown in Figure 5-12. Of these 180 units, 97 units are assigned the lower-income category, 57 units are assigned to the moderate-income category and 26 units are assigned to the above moderate-income category. Larger sites (i.e., between 0.5 and five acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are designated High Segregation and Poverty, Low, and High.

Table 5-30 Residential Sites in North Ceres

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
271	456 BYSTRUM RD	038008009	0.62	Single Family W/Extra Land	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
272	805 SOUZA AVE	038011006	0.46	Single Family W/Extra Land	R-3	No Change	25	5	No	High Segregation and Poverty	YES - Current
273	818 SOUZA AVE	038011010	0.29	Vacant	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
274	703 ERICKSON AVE	038011020	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
275	901 LOMBARDO AVE	038015018	1.13	Single Family W/Extra Land	R-A	No Change	5.4	3	No	High Segregation and Poverty	YES - Current
276	PERFIDIA AVE	038015022	0.16	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
277	720 LOMBARDO AVE	038015039	0.14	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
278	916 SONORA AVE	038016008	0.92	Single Family W/Extra Land	R-3	No Change	25	10	No	High Segregation and Poverty	YES - Current
279	923 LATIMER AVE	038016009	0.47	Single Family W/Extra Land	R-3	No Change	25	5	No	High Segregation and Poverty	YES - Current
280	915 LATIMER AVE	038016010	0.70	Single Family W/Extra Land	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
281	850 SONORA AVE	038016045	0.33	Single Family W/Extra Land	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
282	854 SONORA AVE	038016046	0.39	Single Family W/Extra Land	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
283	1102 LEO AVE	038042001	0.49	Vacant	R-1	No Change	8.7	2	No	High Segregation and Poverty	YES - Current
284	PARSONS CT	038051005	0.18	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
285	PARSONS CT	038051007	0.17	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
286	LIVE OAK CT	039005032	2.47	Vacant	R-A	No Change	5.4	5	No	High Resource	YES - Current
287	1414 HOLM AVE	039030033	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
288	1620 HOLM AVE	039031055	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
289	854 PECOS AVE	038039016	1.19	Single Family W/Extra Land	R-A	R-3	25	22	Yes	High Segregation and Poverty	YES - Current
290	838 PECOS AVE	038039031	0.87	Single Family W/Extra Land	R-A	R-3	25	10	Yes	High Segregation and Poverty	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
291	1809 E HATCH RD	039025019	1.51	Single Family W/Extra Land	R-A	R-3	25	22	Yes	Low Resource	YES - Current
292	822 BYSTRUM RD	038017041	4.40	Mobile home Parks	P-D	R-3	25	62	Yes	High Segregation and Poverty	YES - Current

Figure 5-12 Sites Identified in North Ceres



5.4.12 East Oakdale

East Oakdale is an urbanized area located east of the City of Oakdale off State Highway 120. The area is mostly rural residential surrounded by agricultural operations. Domestic water services are provided by the Oakdale Irrigation District and wastewater is handled with a combination of private septic and package treatment systems. Table 5-31 summarizes available capacity in East Oakdale and Table 5-32 details all residential sites in this area.

Table 5-31 Residential Capacity in East Oakdale

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	51	148.23	0	0	161	161
Rezoned Sites	0	0.00	0	0	0	0
Total	**51**	**148.23**	**0**	**0**	**161**	**161**

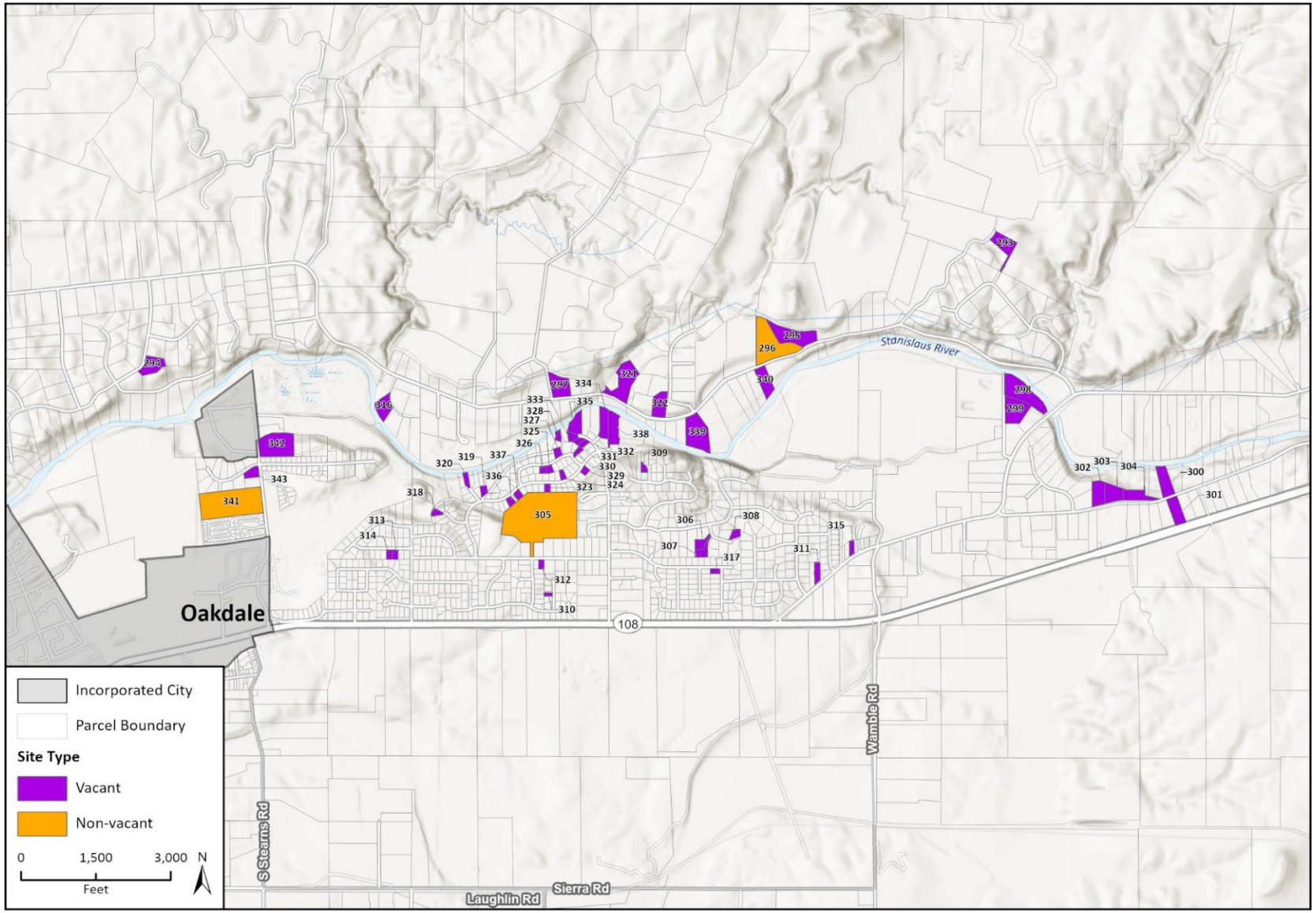
Due to limited sewer capacity, no rezoning is proposed in East Oakdale. The Sites Inventory identified approximately 148 acres across 51 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate an estimated 161 housing units on 51 sites. Figure 5-13 shows sites identified in East Oakdale. All 161 units are assigned to the above moderate-income category. The TCAC Resource categories for the sites in this community range from High to Highest.

Table 5-32 Residential Sites in East Oakdale

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
293	0 SARATOGA HILLS DR	002022038	3.25	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
294	OAK VIEW DR	006081099	3.01	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
295	RODDEN RD	010001078	5.85	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
296	11727 RODDEN RD	010001079	9.71	Single Family W/Extra Land	R-A	No Change	0.33	2	No	Highest Resource	YES - Potential
297	RODDEN RD	010003008	3.67	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
298	0 GRAY RD	010009002	6.80	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
299	0 GRAY RD	010009036	4.68	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
300	LANCASTER RD	010012022	3.15	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
301	13124 LANCASTER RD	010012034	2.85	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
302	0 LANCASTER RD	010012042	2.82	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
303	12919 LANCASTER RD	010012043	2.75	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
304	0 LANCASTER RD	010012044	2.49	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
305	10661 DIXON RD	010021095	30.05	Single Family W/Extra Land	R-A	No Change	2.2	48	No	Highest Resource	YES - Potential
306	9821 BLACK OAK CT	010025104	1.05	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
307	9817 BLACK OAK CT	010025105	1.20	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
308	0 BLACK OAK CT	010025109	0.74	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
309	RIVER OAK CIR	010030023	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
310	SOMMER PL	010033042	0.28	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
311	11761 ORANGE BLOSSOM RD	010034026	1.06	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
312	DIXON RD	010050001	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
313	BUCKMEADOWS DR	010052003	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
314	BUCKMEADOWS DR	010052004	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
315	ORANGE BLOSSOM RD	010057007	0.61	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
316	0 CIMARRON TRAIL	010065007	2.69	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
317	11320 WILD OAK CT	010068016	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
318	FOX BOROUGH CT	010069009	0.56	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
319	10203 ATLAS RD	010071009	0.57	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
320	10019 RIVER RANCH CT	010071015	0.66	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
321	0 RODDEN RD	010074009	6.11	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
322	0 RODDEN RD	010074016	3.03	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
323	0 FOX BOROUGH DR	010075007	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
324	0 FOX BOROUGH DR	010075018	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
325	0 GOLDSBOROUGH CIR	010075026	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
326	0 GOLDSBOROUGH CIR	010075027	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
327	0 GOLDSBOROUGH CIR	010075040	0.62	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
328	0 GOLDSBOROUGH CIR	010075043	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
329	0 FOX BOROUGH DR	010076005	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
330	0 GOLDSBOROUGH CIR	010076009	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
331	0 SAVANNAH CT	010076014	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
332	0 SAVANNAH CT	010076015	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
333	0 SAVANNAH CT	010076016	0.67	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
334	0 NEWBERRY CT	010076022	2.39	Vacant	R-A	No Change	2.2	3	No	Highest Resource	YES - Potential
335	0 SAVANNAH CT	010076028	2.11	Vacant	R-A	No Change	2.2	3	No	Highest Resource	YES - Potential
336	0 HIDDEN HILLS DR	010077009	0.54	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
337	0 HIDDEN HILLS DR	010077011	0.53	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
338	0 DILLWOOD RD	010081005	3.20	Vacant	R-A	No Change	2.2	5	No	Highest Resource	YES - Potential
339	RODDEN RD	010082003	6.52	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
340	RODDEN RD	010083003	3.00	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
341	624 STEARNS	064010010	13.98	Single Family W/Extra Land	R-A	No Change	2.2	44	No	Highest Resource	YES - Potential
342	N STEARNS RD	064014001	7.22	Vacant	R-A	No Change	0.33	11	No	Highest Resource	YES - Potential
343	2321 JACKIE CT	064035014	1.22	Vacant	R-A	No Change	0.33	2	No	Highest Resource	YES - Potential

Figure 5-13 Sites Identified in East Oakdale



5.4.13 Salida

Salida is a community located north of Modesto. The community has a variety of zoning, with a substantial portion of planned developments allowing for single-family residential development. Domestic water service is provided by the City of Modesto and sewer service by the Salida Sanitary District. While the Salida Community Plan (SCP) Amendment area allows for the build out of approximately 5,000 dwelling units, the plan for the Amendment area was adopted without the environmental analysis required under the California Environmental Quality Act (CEQA). Because significant additional environmental review is required prior to the implementation and build-out of the SCP Amendment area, the Plan's capacity has not been included in the Sites Inventory and only capacity in the Existing Salida Community Plan area has been included. Table 5-33 summarizes available capacity in Salida outside of the SCP area and Table 5-34 details all residential sites in this area. Figure 5-14 shows sites identified in Salida.

Table 5-33 Residential Capacity in Salida

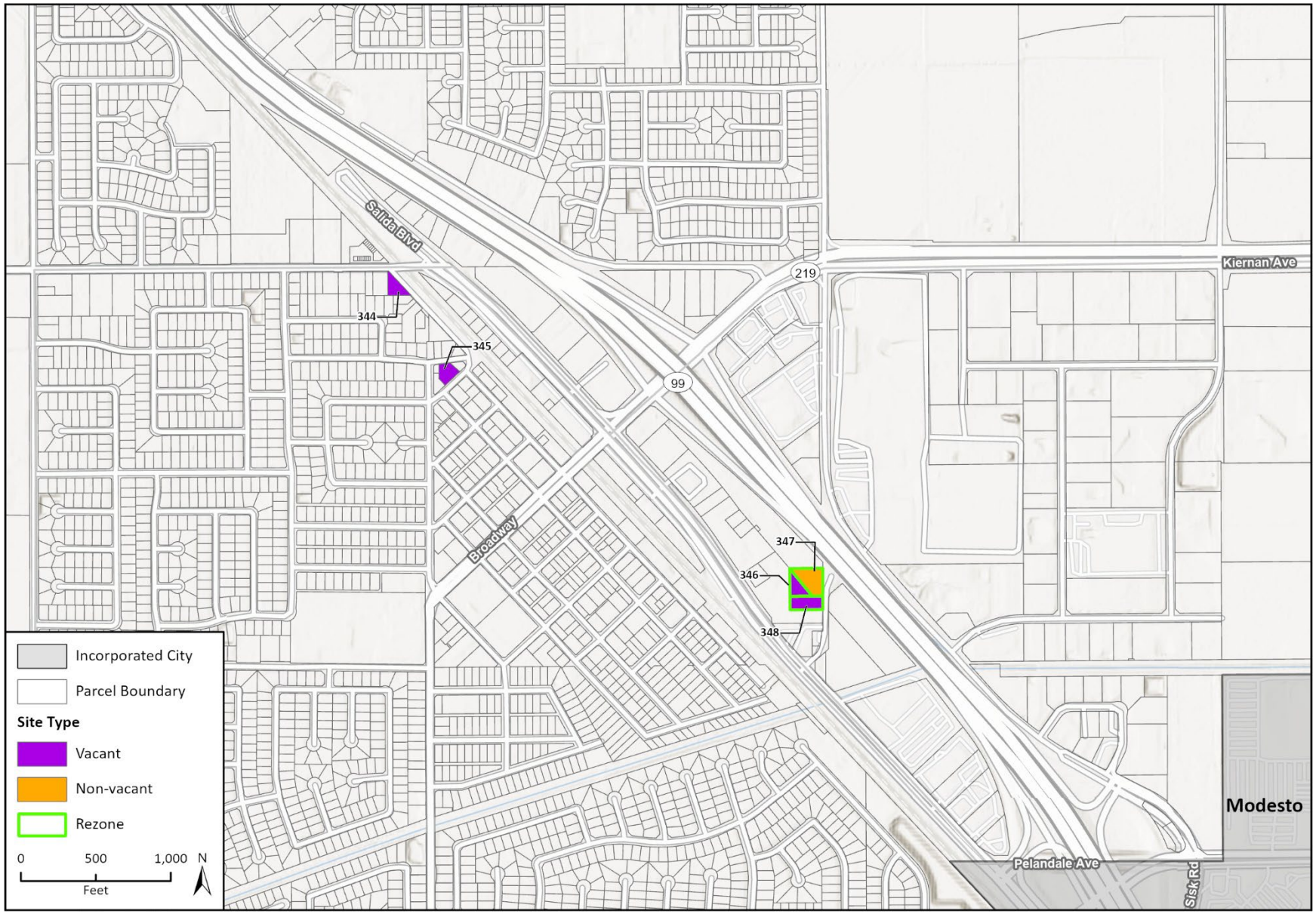
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	2	0.60	0	5	2	7
Rezoned Sites	3	1.4	0	18	3	21
Total	**5**	**2**	**0**	**23**	**5**	**28**

The Sites Inventory identified approximately two acres across five vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate an estimated 28 housing units. Of these 28 units, 23 units are assigned to the moderate-income category and five units are assigned to the above moderate-income category. The County did not assume any lower-income units in this community due to small parcel size and infrastructure constraints of the identified sites. TCAC Resource levels in this community range from Low to Moderate.

Table 5-34 Residential Sites in Salida

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
344	5367 ELM ST	135004042	0.30	Vacant	R-2	No Change	14	3	No	Low Resource	YES - Current
345	4545 MASON AVE	135046004	0.30	Vacant	R-3	No Change	25	4	No	Low Resource	YES - Current
346	HOPE LN	135041010	0.32	Vacant	C-2	MU	25	6	Yes	Moderate Resource	YES - Current
347	4573 HOPE LN	135041011	0.62	Single Family W/Extra Land	C-2	MU	25	6	Yes	Moderate Resource	YES - Current
348	4549 HOPE LN	135041012	0.46	Vacant	C-2	MU	25	9	Yes	Moderate Resource	YES - Current

Figure 5-14 Sites Identified in Salida



5.4.14 South Ceres (Laurel/Central)

South Ceres (Laurel/Central) is an urbanized area adjacent to the southern boundary of the City of Ceres within the City's sphere of influence. The Laurel/Central neighborhood is located east of Central Avenue, west of Highway 99, north of E. Service Road, and south of Industrial Way in an unincorporated pocket on the southside of the City of Ceres. Residential uses surround the neighborhood and industrial development surrounds the neighborhood to the north and east, along Highway 99. The area is mostly residential with several small agricultural properties. The area lacks both domestic water and sewer utilities but has the potential to be served by the City of Ceres for both services. Table 5-35 summarizes available capacity in South Ceres and Table 5-36 details all residential sites in this area.

Table 5-35 Residential Capacity in South Ceres (Laurel/Central)

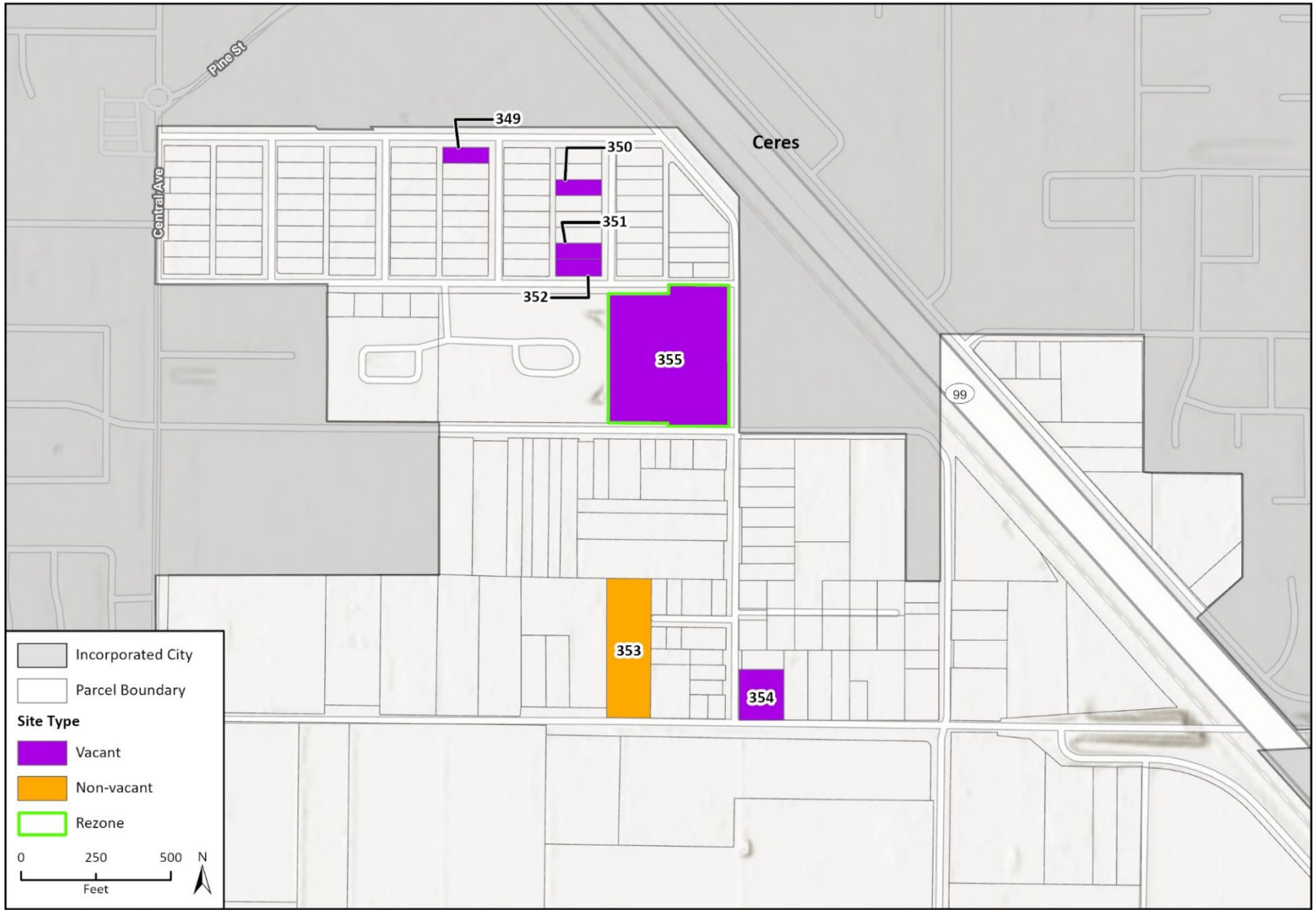
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	6	2.93	0	1	9	10
Rezoned Sites	1	4.18	76	7	0	83
Total	**7**	**7.71**	**76**	**8**	**9**	**93**

The Sites Inventory identified six vacant and underutilized sites with significant undeveloped land suitable for subdivision to accommodate 10 housing units. In addition, one four-acre site in South Ceres will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 83 housing units. Including the proposed rezoning, an estimated 93 housing units are projected on the sites in South Ceres shown in Figure 5-15. Of these 93 units, 76 units are assigned the lower-income category, eight units are assigned to the moderate-income category and nine units are assigned to the above moderate-income category. One larger site was identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

Table 5-36 Residential Sites in South Ceres

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
349	3601 HEMLOCK AVE	053030047	0.19	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
350	3611 LARCH AVE	053031004	0.19	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
351	3625 LARCH AVE	053031008	0.19	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
352	3627 LARCH AVE	053031009	0.20	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Current
353	2449 E SERVICE RD	053036006	1.58	Single Family W/Extra Land	R-A	No Change	5.4	4	No	Low Resource	YES - Current
354	3950 COLLINS RD	053037033	0.58	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Current
355	3703 COLLINS RD	053031023	4.18	Vacant	P-D	R-3	25	83	Yes	Low Resource	YES - Current

Figure 5-15 Sites Identified in South Ceres



5.4.15 Turlock (Kenwood/Star)

The Kenwood/Star area is a County island within the City of Turlock. The Sites Inventory identified three vacant sites zoned for multifamily residential within the area. These sites are suitable to accommodate an estimated 10 housing units. Sewer is currently provided by private septic, with some connections to the City of Turlock, but recent American Rescue Plan Act (ARPA) funding is slated to bring municipal sewer service to the area by 2026. Water utilities are provided by the City of Turlock. Figure 5-16 shows sites identified in Turlock. Table 5-37 summarizes available capacity in Turlock and Table 5-38 details all residential sites in this area.

Table 5-37 Residential Capacity in Turlock

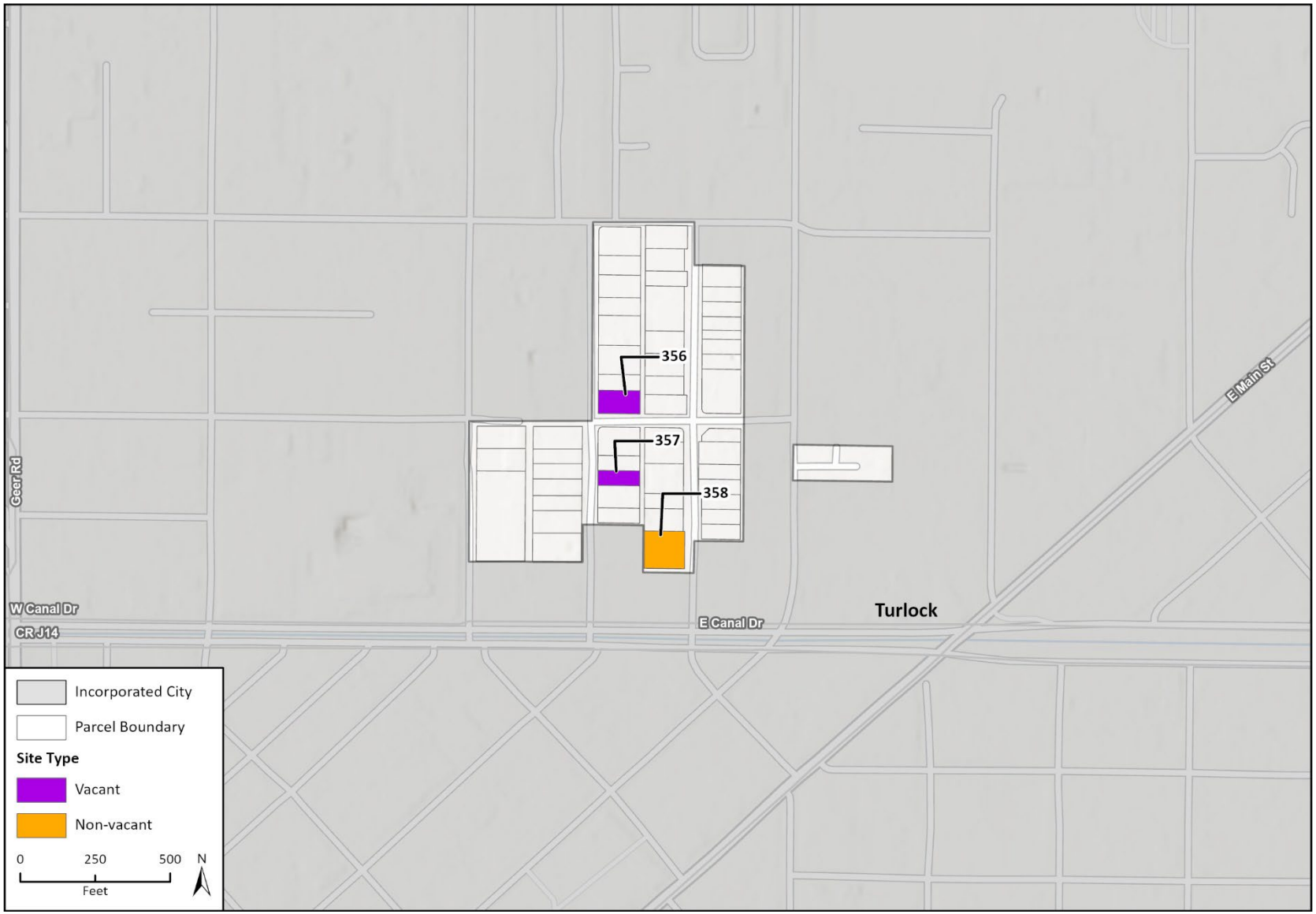
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	3	0.80	0	7	3	10
Rezoned Sites	0	0	0	0	0	0
Total	**3**	**0.80**	**0**	**7**	**3**	**10**

The Sites Inventory identified three vacant and underutilized sites with significant undeveloped land suitable for subdivision to accommodate 10 housing units. Of these 10 units, seven units are assigned to the moderate-income category and three units are assigned to the above moderate-income category. One larger site was identified for rezone in this community to meet the size requirement for lower-income units. The County did not assume any lower-income units in this community due to small parcel size of identified sites. The TCAC Resource categories for the sites in this community are Moderate.

Table 5-38 Residential Sites in Turlock (Kenwood/Star)

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
356	1000 MITCHELL AVE	042021005	0.25	Vacant	R-3	No Change	25	4	No	Moderate Resource	YES - Current
357	940 MITCHELL AVE	042024024	0.16	Vacant	R-3	No Change	25	2	No	Moderate Resource	YES - Current
358	859 KENWOOD AVE	042024032	0.39	Single Family W/Extra Land	R-3	No Change	25	4	No	Moderate Resource	YES - Current

Figure 5-16 Sites Identified in Turlock (Kenwood/Star)



5.4.16 Valley Home

Valley Home is a small rural community in northeastern Stanislaus County, located north of Oakdale and west of the Woodward Reservoir. Multifamily housing development in Valley Home is not expected due to the lack of public sewer and water services. As a result, no rezoning is proposed in Valley Home. The Sites Inventory identified four rural residential parcels each suitable for the development of one housing unit. Figure 5-17 shows sites identified in Valley Home. Table 5-39 summarizes available capacity in Valley Home and Table 5-40 details all residential sites in this area.

Table 5-39 Residential Capacity in Valley Home

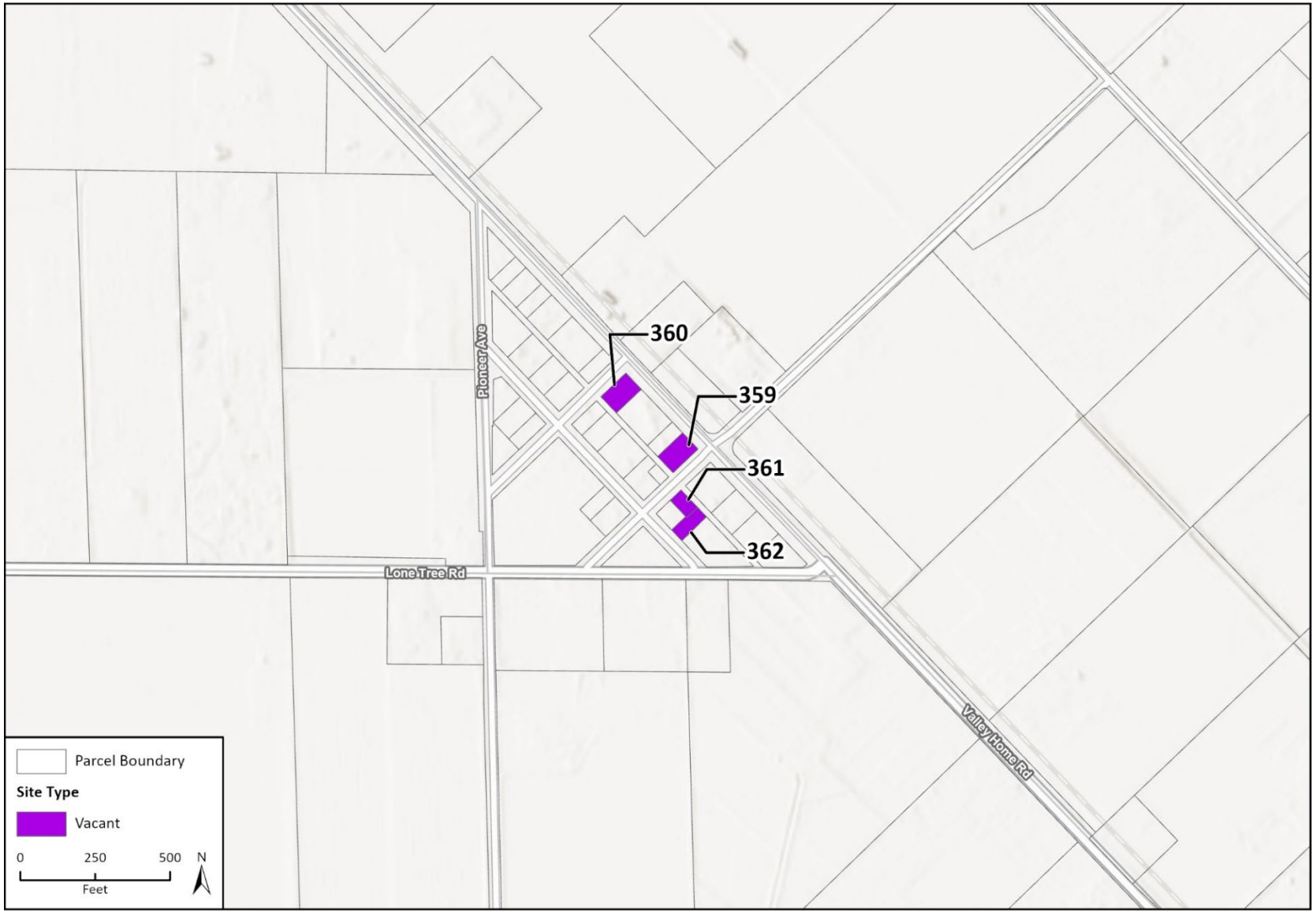
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	4	0.61	0	0	4	4
Rezoned Sites	0	0.00	0	0	0	0
Total	**4**	**0.61**	**0**	**0**	**4**	**4**

The Sites Inventory identified four vacant to accommodate four housing units. All four units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning and smaller parcel size of the identified sites. The TCAC Resource categories for the sites in this community are Highest.

Table 5-40 Residential Sites in Valley Home

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
359	VALLEY HOME RD	002006047	0.20	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential
360	13137 VALLEY HOME RD	002006061	0.20	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential
361	4702 MICHIGAN AVE	002006066	0.09	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential
362	13042 MINNESOTA AVE	002006067	0.12	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential

Figure 5-17 Sites Identified in Valley Home



5.4.17 West Modesto

West Modesto is an urbanized area in the City of Modesto's Sphere of Influence and includes properties zoned for various densities of residential development. The Sites Inventory groups together the Elm/Emerald, Spencer/Marshall, Rouse/Colorado, California/Briggs, Robertson Road, Beverly/Waverly neighborhoods into the "West Modesto" area. The West Modesto area is an unincorporated area located along the southwest edges of the City of Modesto, north of the Tuolumne River, south of Maze Boulevard, and east of Carpenter Road. Figure 5-18 shows the sites identified in West Modesto. The County, in partnership with the City of Modesto, is extending sewer service to the Spencer/Marshall and Rouse/Colorado neighborhoods, which are currently served by septic systems, by the end of 2026. The West Modesto area is also the subject of the City of Modesto's Southwest Modesto Plan which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, infrastructure extending to the unincorporated area. The Plan includes opportunity sites to incorporate higher densities for a variety of housing types. Table 5-41 summarizes available capacity in West Modesto and Table 5-42 details all residential sites in this area.

Table 5-41 Residential Capacity in West Modesto

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	50	32.34	0	109	92	201
Rezoned Sites	18	23.44	248	107	15	370
Total	**68**	**55.78**	**248**	**216**	**107**	**571**

The Sites Inventory identified approximately 32 acres of vacant land and underutilized properties suitable for subdivision in West Modesto across 50 properties. These sites can accommodate an estimated 201 housing units. A total of approximately 23 acres of land across 18 parcels will be rezoned to accommodate the development of 370 housing units at densities up to 25 dwelling units per acre. Including the proposed rezoning, an estimated 571 housing units are projected in West Modesto. Of these 571 units, 248 units are assigned to the lower-income category, 216 units are assigned to the moderate-income category, and 107 units are assigned to the above moderate-income category. Larger sites (i.e., between 0.5 and five acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

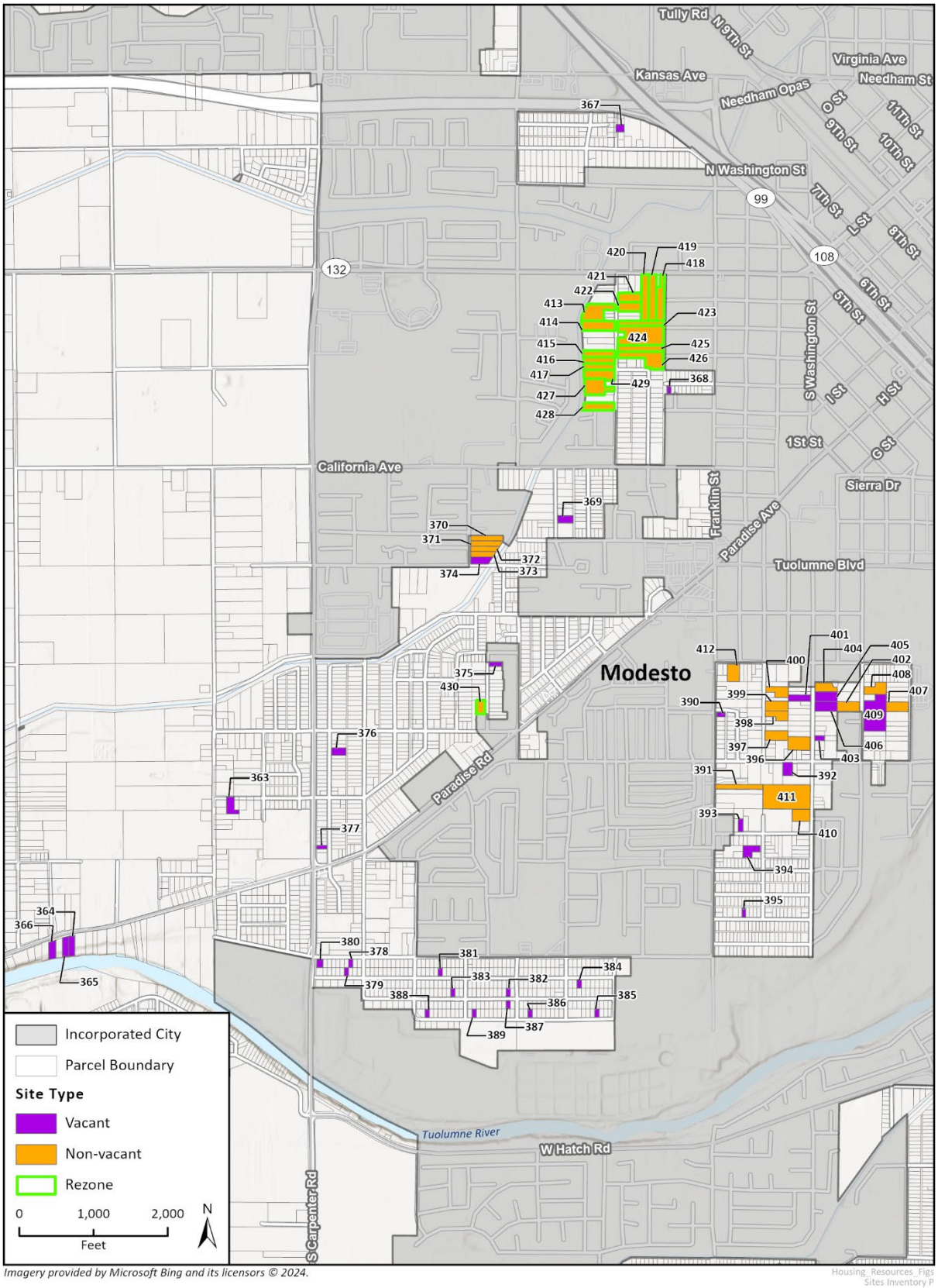
Table 5-42 Residential Sites in West Modesto

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
363	WAVERLY DR	017016015	0.63	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
364	0 PARADISE RD	017033015	0.52	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
365	0 PARADISE RD	017033016	0.52	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
366	0 PARADISE RD	017033018	0.52	Vacant	R-A	No Change	2.2	1	No	Low Resource	YES - Current
367	622 ELM WAY	029016003	0.25	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
368	433 SPRUCE ST	030010013	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Planned
369	0 SEYBOLD AVE	030014028	0.48	Vacant	R-1	No Change	8.7	2	No	Low Resource	YES - Current
370	924 PANAMA DR	030015027	0.71	Single Family W/Extra Land	R-3	No Change	25	8	No	Low Resource	YES - Current
371	1000 PANAMA DR	030015028	0.69	Single Family W/Extra Land	R-3	No Change	25	7	No	Low Resource	YES - Current
372	1004 PANAMA DR	030015029	0.61	Single Family W/Extra Land	R-3	No Change	25	7	No	Low Resource	YES - Current
373	1008 PANAMA DR	030015030	0.53	Single Family W/Extra Land	R-3	No Change	25	5	No	Low Resource	YES - Current
374	1012 PANAMA DR	030015031	0.60	Vacant	R-3	No Change	25	9	No	Low Resource	YES - Current
375	1312 RITSCH LN	037004060	0.24	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
376	1520 VICTORIA DR	037005025	0.45	Vacant	R-1	No Change	8.7	2	No	Low Resource	YES - Current
377	VICTORIA DR	037010012	0.16	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
378	ROBERTSON RD	037020009	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
379	KENNETH ST	037020037	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
380	2236 ROBERTSON RD	037020079	0.22	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Current
381	2021 KENNETH ST	037021040	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
382	1905 DONALD ST	037021068	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
383	2009 DONALD ST	037021080	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
384	1728 KENNETH ST	037022050	0.16	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
385	1713 JOHN ST	037024025	0.16	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
386	1827 JOHN ST	037024037	0.16	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
387	1904 DONALD ST	037025021	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
388	2033 JOHN ST	037025040	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
389	0 JOHN ST	037025053	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
390	1420 ELSIE ST	037030059	0.16	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
391	719 SUTTER AVE	037031015	0.97	Single Family W/Extra Land	R-2	No Change	14	5	No	Low Resource	YES - Current
392	1202 ROUSE AVE	037031029	0.55	Vacant	R-2	No Change	14	5	No	Low Resource	YES - Planned
393	1323 FIGARO AVE	037032007	0.27	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Planned
394	0 LEON AVE	037032045	0.68	Vacant	R-3	No Change	25	10	No	Low Resource	YES - Planned
395	1317 AVALON AVE	037034039	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Planned
396	620 COLORADO AVE	037039016	1.26	Single Family W/Extra Land	R-2	No Change	14	9	No	Low Resource	YES - Planned
397	615 LEON AVE	037039027	0.94	Single Family W/Extra Land	R-2	No Change	14	6	No	Low Resource	YES - Planned
398	601 LEON AVE	037039031	0.77	Single Family W/Extra Land	R-2	No Change	14	5	No	Low Resource	YES - Planned
399	527 LEON AVE	037039032	0.94	Single Family W/Extra Land	R-2	No Change	14	6	No	Low Resource	YES - Planned
400	517 LEON AVE	037039035	0.83	Single Family W/Extra Land	R-2	No Change	14	6	No	Low Resource	YES - Planned
401	COLORADO AVE	037039039	0.60	Vacant	R-2	No Change	14	6	No	Low Resource	YES - Planned
402	528 ROSELAWN AVE	037040012	0.91	Single Family W/Extra Land	R-2	No Change	14	7	No	Low Resource	YES - Planned
403	COLORADO AVE	037040021	0.20	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Planned
404	507 COLORADO AVE	037040028	0.74	Single Family W/Extra Land	R-2	No Change	14	5	No	Low Resource	YES - Planned
405	0 COLORADO AVE	037040056	0.91	Vacant	R-2	No Change	14	9	No	Low Resource	YES - Planned
406	525 COLORADO AVE	037040057	0.91	Vacant	R-2	No Change	14	9	No	Low Resource	YES - Planned
407	532 SUNSET AVE	037041014	0.91	Single Family W/Extra Land	R-1	No Change	8.7	3	No	Low Resource	YES - Planned
408	519 ROSELAWN AVE	037041035	0.92	Single Family W/Extra Land	R-1	No Change	8.7	3	No	Low Resource	YES - Planned
409	ROSELAWN AVE	037041036	3.12	Vacant	R-1	No Change	8.7	17	No	Low Resource	YES - Planned
410	812 COLORADO AVE	037032011	0.92	Single Family W/Extra Land	R-A	No Change	5.4	3	No	Low Resource	YES - Planned
411	718 COLORADO AVE	037031011	4.85	Single Family W/Extra Land	R-A	No Change	5.4	16	No	Low Resource	YES - Planned
412	1406 SOUTH AVE	037030002	0.89	Single Family W/Extra Land	R-1	No Change	8.7	4	No	Low Resource	YES - Planned
413	207 SPENCER AVE	030004005	1.66	Single Family W/Extra Land	R-A	R-3	25	28	Yes	Low Resource	YES - Planned
414	227 SPENCER AVE	030004009	1.35	Single Family W/Extra Land	R-A	R-3	25	18	Yes	Low Resource	YES - Planned
415	323 SPENCER AVE	030004013	0.87	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Planned
416	333 SPENCER AVE	030004014	0.84	Single Family W/Extra Land	R-A	R-3	25	12	Yes	Low Resource	YES - Planned
417	337 SPENCER AVE	030004015	0.82	Single Family W/Extra Land	R-A	R-3	25	12	Yes	Low Resource	YES - Planned
418	523 MAZE BLVD	030005001	1.31	Single Family W/Extra Land	R-1	R-3	25	22	Yes	Low Resource	YES - Planned
419	531 MAZE BLVD	030005003	1.45	Single Family W/Extra Land	R-1	R-3	25	22	Yes	Low Resource	YES - Planned

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
420	539 MAZE BLVD	030005004	1.44	Single Family W/Extra Land	R-1	R-3	25	22	Yes	Low Resource	YES - Planned
421	128 SPENCER AVE	030005011	0.90	Single Family W/Extra Land	R-1	R-3	25	13	Yes	Low Resource	YES - Planned
422	204 SPENCER AVE	030005012	0.88	Single Family W/Extra Land	R-1	R-3	25	12	Yes	Low Resource	YES - Planned
423	226 SPENCER AVE	030005015	0.94	Single Family W/Extra Land	R-1	R-3	25	15	Yes	Low Resource	YES - Planned
424	310 SPENCER AVE	030005016	3.54	Single Family W/Extra Land	R-1	R-3	25	66	Yes	Low Resource	YES - Planned
425	320 SPENCER AVE	030005018	1.24	Single Family W/Extra Land	R-1	R-3	25	20	Yes	Low Resource	YES - Planned
426	533 TRUMAN AVE	030005026	2.01	Single Family W/Extra Land	R-1	R-3	25	30	Yes	Low Resource	YES - Planned
427	415 SPENCER AVE	030008003	1.51	Single Family W/Extra Land	R-A	R-3	25	27	Yes	Low Resource	YES - Planned
428	511 SPENCER AVE	030008006	0.98	Single Family W/Extra Land	R-A	R-3	25	12	Yes	Low Resource	YES - Planned
429	405 SPENCER AVE	030008016	1.20	Single Family W/Extra Land	R-A	R-3	25	20	Yes	Low Resource	YES - Planned
430	1427 RITSCH LN	037004061	0.50	Single Family W/Extra Land	R-1	R-3	25	6	Yes	Low Resource	YES - Planned

Figure 5-18 Sites Identified in West Modesto



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Sites Inventory P

5.5 Sites Inventory Methodology and Justification

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

5.5.1 Suitable Sites for Affordable Housing

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

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

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

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

projected in the sites inventory are in low-resource census tracts, these tracts have higher access to goods and services, due to their proximity to urban services in the City of Modesto and City of Ceres.

5.5.2 Non-vacant Sites

The housing element must analyze the extent to which existing uses may impede additional residential development. The Sites Inventory accommodates approximately 58 percent of its lower-income RHNA, 37 percent of its moderate-income RHNA, and 54 percent of its above moderate-income RHNA on vacant sites. As a result of insufficient available vacant land, the County identified the remaining 42 percent of the lower-income RHNA, 63 percent of its moderate-income RHNA, and 36 percent of its above moderate-income RHNA on nonvacant sites. Nonvacant sites selected for inclusion in the inventory were chosen because they represent the highest potential for becoming available for residential development and add significant quantities of units to the County's housing stock.

Redevelopment Trends of Nonvacant Sites

Table 5-43 summarizes the recent redevelopment trends on non-vacant parcels throughout Stanislaus County. All non-vacant parcels identified in the Sites Inventory have characteristics which are similar or which more strongly indicate a high likelihood of redevelopment than the pre-construction conditions of recent projects in Stanislaus County. A discussion of the factor for inclusion in the Sites inventory is included below.

A parcel's improvement-to-land value ratio (ILR) can be used to identify properties that are likely to be redeveloped during the planning period. A ratio of less than 1.0 indicates that the real estate market values the land itself more highly than any structure on that land. These underutilized parcels represent opportunities for property owners and developers to invest in improvements that increase the overall value of the property. It should be noted that the ILR value ratio of a property does not necessarily consider development standards or environmental constraints that may impact the feasibility of redevelopment on the site.

The average ILR of recent projects on nonvacant sites is 0.95. One of these projects redeveloped a site with an ILR of 3.25, much higher than 1.0, indicating that development is occurring on sites with ILR values much higher than what is assumed on the Sites Inventory.

It should be noted that the Assessor's records do not contain data for some properties, especially older properties that have not undergone a reassessment (due to a change in ownership or significant improvements). For parcels identified as vacant or surface parking but do not have information on assessed land and improvement values, it would be reasonable to assume the ILR to be zero or very close to zero.

The age of a structure is useful in demonstrating that a site has a higher likelihood of redevelopment. New construction on the site indicates that a property owner is unlikely to invest in additional improvements or redevelop the site in the upcoming housing cycle. Development trends demonstrate that successfully redeveloped nonvacant sites had structures which were greater than 35 years old.

FAR values lower than what is permitted by the Zoning Ordinance indicate underutilization, especially in downtown areas or upzoned corridors. Conversely, developed sites with higher FAR are less likely to redevelop as the land and demolition costs would be high. Development trends demonstrate that successfully redeveloped nonvacant sites had an average FAR of 0.13, although some projects' FARs were 0.36, 0.30, and as high as 0.80.

Additionally, all sites identified for lower-income units meet state size and density requirements to facilitate the development of lower-income units.

Table 5-43 Redevelopment Trends of Non-Vacant Sites

Locality	Project Name	Previous Use	Zoning	Site Acreage	Total Units	ILR[1]	Year Built[2]	FAR[3]
Keyes	Keyes 19 North	Two Single Family Dwellings with Extra Land	R-1	13.20	62	0.74	1978	0.03
Keyes	Gold Star Investments	Single Family with Extra Land	R-1	9.54	28	0.07	–	–
Denair	WPD Homes	Single Family with Extra Land	P-D (356)	1.32	10	0.54	1930	0.05
Keyes	Orange Grove Estates	Single Family with Extra Land	R-1	2.11	8	1.51	1988	0.02
Denair	Elmwood Estates	Single Family with Extra Land	Rezoned to P-D	4.82	17	1.18	1950	0.01
Denair	Isaaco Estates	Two Single Family Dwellings with Extra Land	R-A	3.10	11	3.25/ 0.05	1963	0.03
Keyes	Keyes 19 South	Single Family with Extra Land	R-1	6.70	26	0.29	1992	0.02
Denair	Lazares Companies	Single Family with Extra Land	R-A	18.20	69	0.93	1908/ 1979	0.01
Modesto	Archway Commons I	Industrial	P-D	4.50	76	-	-	0.36
Modesto	1612 Sisk Road.	Motel	C-3	6.72	150	-	1972	0.30
Modesto	1208 9th Street	Commercial Building, Medical Office	UGD	0.20	14	1.0	1982	0.82
Modesto	7th Street Village	Warehouse	TD	0.93	79	2.1	1957	0.16
Modesto	3313 Coffee Mixed-Use	School	P-D	0.19	17	–	1970s	0.10
Average						**1.06**	**1969**	**0.16**

[1] "ILR" or "improvement-to-land value ratio" is calculated by dividing the improvement value by the land value. If the yield is less than one, the land is worth more than the improvements built on it.

[2] "Year Built" refers to the year the existing nonvacant use (e.g single-family home, motel, commercial building) was built.

[3] "FAR" or "Floor Area Ratio" is calculated by diving a building's gross floor area by the total lot size.

Because of the County's rural land use pattern, the most common existing land use to be redeveloped with housing in the County were single-family houses on lots with a significant portion of vacant land. The recent redevelopment of eight sites throughout the County has shown that these types of rural residential properties are likely to redevelop with larger-scale residential projects. For example, the Keyes 19 and Gold Star Investments projects in Keyes developed 62 and 28 units respectively on lots formerly occupied by single-family homes. Similarly, the Lazares Subdivision and the WPD Homes projects in Denair developed 69 and 10 units respectively on sites occupied by single-family homes. An existing unit will remain on the site after construction of the WPD Homes project.

The recent Archway Commons and 1612 Sisk Road projects, developed within the City of Modesto, demonstrate the feasibility of redevelopment of service commercial and hotel/motel uses. The Archway Commons project developed 150 units of affordable housing in two phases on the site of a

former commercial trucking yard. The 1612 Sisk Road project is in the process of converting a former hotel to 150 units of supportive housing.

In addition to the specific housing project discussed above, two ongoing planning efforts by the City of Modesto, the Southwest Modesto Plan and the Modesto Housing Plan, have identified West Modesto and the Crows Landing Road corridor for public investment to support the development of multifamily housing. The Modesto Housing Plan explores ways to expand housing choice while responding to shifting household needs, growing demand for walkable neighborhoods, and the need for housing at different price points. The Housing Plan provides planning and policy guidance to remove barriers and boost housing production. The Housing Plan includes "test-fit" middle housing design and feasibility case studies on several commercial corridors in and just outside of the City of Modesto, including Crows Landing Road. The Study found that, with small adjustments to the development standards applicable on corridor adjacent sites, numerous housing typologies are feasible.

Similarly, the Southwest Modesto Plan intends to serve as a blueprint for future development, with guidance on land use, economic development, transportation, infrastructure, and other issues for the Southwest Modesto Plan Area. The Plan Area includes opportunity sites along the Crows Landing Corridor and is intended to facilitate the revitalization and housing development throughout Southwest Modesto.

Nonvacant Site Selection

To identify potential sites for additional development, geospatial data was used to identify nonvacant but underutilized properties within the unincorporated areas of the County. To further justify the redevelopment potential of nonvacant sites and to evaluate the extent existing uses could impede development, the County identified sample sites to represent all of the inventoried nonvacant sites included. These sample sites were selected because they represent the typical pre-construction characteristics of nonvacant sites identified in the Sites Inventory. Parcels were chosen as sites likely to be redeveloped during the planning period if they fell into the following categories:

Vacant Buildings

Vacant buildings have potential for redevelopment as these properties are underutilized, providing an incentive for property owners to redevelop. On some properties in the Sites Inventory, the existing conditions or design of the buildings are outdated for current market demand, resulting in vacancies. Substantial improvements may be needed to make these structures leasable in their current configuration, which provides incentive for property owners to redevelop the sites with new buildings.

Single-Family Home with Extra Land

The recent development trends in the County (shown in Table 5-43) summarizes the recent redevelopment trends on non-vacant parcels throughout Stanislaus County. All non-vacant parcels identified in the Sites Inventory have characteristics which are similar or which more strongly indicate a high likelihood of redevelopment than the pre-construction conditions of recent projects in Stanislaus County. A discussion of the factor for inclusion in the Sites inventory is included below.

A parcel's improvement-to-land value ratio (ILR) can be used to identify properties that are likely to be redeveloped during the planning period. A ratio of less than 1.0 indicates that the real estate market values the land itself more highly than any structure on that land. These underutilized parcels

represent opportunities for property owners and developers to invest in improvements that increase the overall value of the property. It should be noted that the ILR value ratio of a property does not necessarily consider development standards or environmental constraints that may impact the feasibility of redevelopment on the site.

The average ILR of recent projects on nonvacant sites is 0.95. One of these projects redeveloped a site with an ILR of 3.25, much higher than 1.0, indicating that development is occurring on sites with ILR values much higher than what is assumed on the Sites Inventory.

It should be noted that the Assessor's records do not contain data for some properties, especially older properties that have not undergone a reassessment (due to a change in ownership or significant improvements). For parcels identified as vacant or surface parking but do not have information on assessed land and improvement values, it would be reasonable to assume the ILR to be zero or very close to zero.

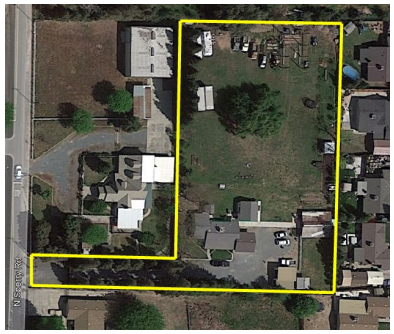
The age of a structure is useful in demonstrating that a site has a higher likelihood of redevelopment. New construction on the site indicates that a property owner is unlikely to invest in additional improvements or redevelop the site in the upcoming housing cycle. Development trends demonstrate that successfully redeveloped nonvacant sites had structures which were greater than 35 years old.

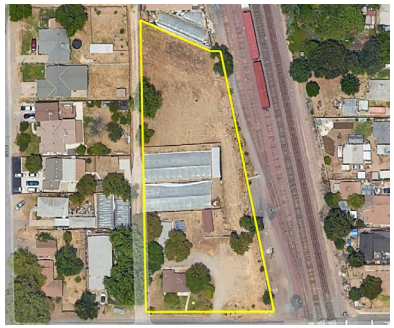
FAR values lower than what is permitted by the Zoning Ordinance indicate underutilization, especially in downtown areas or upzoned corridors. Conversely, developed sites with higher FAR are less likely to redevelop as the land and demolition costs would be high. Development trends demonstrate that successfully redeveloped nonvacant sites had an average FAR of 0.13, although some projects' FARs were 0.36, 0.30, and as high as 0.80.

Additionally, all sites identified for lower-income units meet state size and density requirements to facilitate the development of lower-income units. Table 5-43 demonstrate that parcels occupied by one or two single-family homes with a significant amount of excess land are commonly redeveloped. Each of the recently redeveloped single-family properties had a low FAR (less than 0.10) and structures which were more than 35 years old. Projects on several of the recently redeveloped sites maintained the existing structures and only redeveloped vacant portions of the site. While many of these sites are likely to be redeveloped in their entirety, the estimated capacity of all sites with an existing single-family home is based on the amount of land available for development if the existing residences remained on the site.

Of the 88 nonvacant sites identified in the inventory, 81 sites have one or two single-family homes with a large portion of undeveloped land. All sites with existing single-family homes identified in the inventory have floor area ratios of less than 0.1 and no structures less than 35 years old. Table 5-44 discusses eight of the 81 single-family sites with significant undeveloped land included in the inventory.

Table 5-44 Single Family with Extra Land Representative Sites

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
Santa Fe Avenue, Denair	Existing single-family residential use, with 1.76 acres of undeveloped land. Existing single-family home was built in 1947 and has an ILV of 0.92 and a FAR of 0.03, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.03, year built: 1930 and previous use: SFR with extra land) ▪ Elmwood Estates (ILR: 1.18, previous use: SFR with extra land, year built: 1950, and FAR 0.01) ▪ Lazares Companies Subdivision (ILR: 0.93 and previous use: SFR with extra land)	1.76	5	
Sperry Road, Denair	Existing single-family residential use in Denair, with 1.69 acres of undeveloped land. Existing single-family development was built in 1935 and has an ILV of 0.96 and a FAR of 0.02, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.03, year built: 1930 and previous use: SFR with extra land) ▪ Elmwood Estates (ILR: 1.18, previous use: SFR with extra land, year built: 1950, and FAR 0.01) ▪ Lazares Companies Subdivision (ILR: 0.93 and previous use: SFR with extra land)	1.69	5	
4th Street, Hickman	Existing single-family residential use in Hickman, with 1.93 acres of undeveloped land. The existing single-family development was built in 1956 and has an ILR of 0.76 and a FAR of 0.02, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.03, ILR: 0.54, and previous use: SFR with extra land) ▪ Elmwood Estates (ILR: 1.18, previous use: SFR with extra land, year built: 1950, and FAR 0.01) ▪ Lazares Companies Subdivision (ILR: 0.93, previous use: SFR with extra land, and density 3.79)	1.93	5	

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
Colorado Avenue, West Modesto	Existing single-family residential use in West Modesto, with 4.85 acres of undeveloped land. The existing single-family home was built in 1942 and has an ILR of 0.60 and a FAR of 0.01, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.03, ILR: 0.54, year built: 1930, and previous use: SFR with extra land) ▪ Elmwood Estates (previous use: SFR with extra land, year built: 1950, density: 3.52, and FAR 0.01) ▪ Lazares Companies Subdivision (ILR: 0.93, previous use: SFR with extra land, and density 3.79)	4.85	16	
2nd Street, Empire	Existing single-family residential use in Empire, with 1.10 acres of undeveloped land. The existing single-family home was built in 1930 and has an ILV of 0.71 and a FAR of 0.01, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.03, year built: 1930, and previous use: SFR with extra land) ▪ Elmwood Estates (previous use: SFR with extra land, ILR: 1.18, year built: 1950, and FAR 0.01) ▪ Lazares Companies Subdivision (previous use: SFR with extra land, ILR: 0.93)	1.1	5	
Roselawn Avenue, West Modesto	Existing single-family residential use in west Modesto, with 0.60 acres of undeveloped land. The existing single-family home was built in 1935 and has a FAR of 0.03, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.03, year built: 1930, and previous use: SFR with extra land) ▪ Isaaco Estates (FAR: 0.03 and previous use: two SFR with extra land)	0.92	3	

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
Leon Avenue, West Modesto	Existing single-family residential use in West Modesto, with 0.61 acres of undeveloped land. The existing single-family development was built in 1938 and has a FAR of 0.04, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.03, year built: 1930, and previous use: SFR with extra land) ▪ Isaaco Estates (FAR: 0.03 and previous use: two SFR with extra land)	0.94	6	
Sonora Avenue, North Ceres	Existing single-family residential use in North Ceres, with 0.68 acres of undeveloped land. The existing single-family home was built in 1940 and has a FAR of 0.02, lower than the average FAR of pipeline projects. Recent projects with similar predevelopment characteristics: ▪ WPD Homes (FAR: 0.02, year built: 1930, and previous use: SFR with extra land) ▪ Orange Grove Estates (FAR: 0.02 and previous use: SFR with extra land) ▪ Elmwood Estates (FAR: 0.01, acreage: 1.18, year built: 1950, and previous use: SFR with extra land)	0.92	10	

Multifamily and Mobile Home Parks with Extra Land

Three sites with existing multifamily or mobile home development are included in the Sites Inventory. The sites at 32 and 100 South Abbie Street in Empire are two of five adjacent parcels which were studied as part of a feasibility analysis for the development of an affordable housing project in Empire. County staff is currently going through the Surplus Land Act process to develop the former Empire library site (a County-owned site adjacent to 32 and 100 South Abbie Street) with high-density residential units; the County has also reached out to the surrounding property owners to discuss the possibility of including the four parcels south of the County's property as part of a larger residential project on Abbie Street. A preliminary analysis found that an affordable housing development on the County owned site and a portion of four adjacent parcels, including 32 and 100 South Abbie Street would be financially feasible, competitive in grant application processes, and generally a high-value location given its proximity to Empire Elementary, Empire Head Start Center, Golden Valley Health Center, and Empire Public Library. The Sites inventory assumes that all existing multifamily units would remain on site and any additional construction would take place on the significant vacant portions of each lot. The Sites inventory conservatively assumes that, once rezoned to R-3 zoning, each site has a capacity of 13 dwelling units for a total of 26 units.

In addition to the two sites in Empire, a small mobile home park at 822 Bystrum Road in North Ceres is suitable for the development of an estimated 62 dwelling units on the vacant portion of the site allowing the existing dwelling units to remain. The existing use of the site is significantly underutilized with only a small portion occupied by an aging mobile home park. Stanislaus County has been awarded a Caltrans Sustainable Transportation Planning Grant to address problems with land use compatibility, pedestrian/bike access (lack of sidewalks and bike lanes), and stormwater facilities improvements along the 9th Street Corridor. Planned improvements to the corridor will further increase the viability and amenity of this site for the development of housing affordable to lower income households. Table 5-45 discusses the three multifamily or mobile home park sites with significant undeveloped land included in the inventory.

Underutilized Commercial/Mixed-Use Sites

A small group of four underutilized commercial sites along Crows Landing Road were included in the Sites Inventory as candidates for multifamily residential development. Each of these sites had improvement-to-land value ratios less than 1.0, floor area ratios less than 0.25, and structures greater than 40 years old. These sites will be rezoned to Mixed Use (MU) which will be modified to allow mixed-use development between 20 and 25 dwelling units per acre as described in Program 3-1. The Crows Landing Road commercial corridor is also the subject of the City of Modesto's Southwest Modesto Plan which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, and infrastructure extending to the unincorporated area. The Southwest Modesto Plan and Modesto's Housing Plan both modeled a blend of high-density residential and commercial development on several vacant and underutilized sites along the Crows Landing Road corridor. Table 5-46 discusses the redevelopment potential of Commercial/Mixed-Use sites included in the inventory.

Table 5-45 Multifamily and Mobile Home Park with Extra Land

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
South Abbie Street, Empire	Site encompasses 5 parcels for a combined total area of 4.77 acres. Existing single- and multifamily residential use, with 3.56 acres of developable land. Existing single- and multifamily buildings were built between 1907 and 1972 and with an average ILV (of nonvacant sites) of 1.98 and a FAR of 0.18. The County is currently in discussions with property owners and affordable housing developers to construct an estimated 61 dwelling units on the vacant portion of the site. For the purposes of the Sites Inventory, the capacity of each of the five parcels was estimated as if each site would be developed independently; the total capacity of all sites developed together is likely higher than the inventory's estimate.	1.76	61	
Bystrum Road, North Ceres	Existing mobile home park in North Ceres, with 3.1 acres of undeveloped land. The existing mobile home park was built in 1948 covers a small portion of the lot. An estimated 62 multifamily units can be built on the vacant portion of the property, allowing the existing mobile homes to remain on the site. Stanislaus County has been awarded a Caltrans Sustainable Transportation Planning Grant to address problems with land use compatibility, pedestrian/bike access (lack of sidewalks and bike lanes), and stormwater facilities improvements along the 9th Street Corridor.	4.4	62	

Table 5-46 Underutilized Commercial/Mixed-Use Representative Sites

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
Crows Landing Road, Bret Harte	This parcel is located in Bret Harte and has existing commercial uses. The existing development was built in 1963 and has an ILR of 0.59 a FAR of 0.04, both lower than the average ILR and average FAR of pipeline projects. Development trends with similar predevelopment characteristics: ▪ WPD Homes (ILR: 0.54 and FAR 0.03) ▪ Archway Commons (previously commercial / industrial; developed at 16.9 du/ac)	0.77	12	
Crows Landing Road, Bret Harte	This parcel is located in Bret Harte and has an existing commercial use. The existing development was built in 1968 and has an ILR of 0.84 a FAR of 0.06, both lower than the average ILR and average FAR of pipeline projects. Development trends with similar predevelopment characteristics: ▪ Elmwood Estates (ILR: 1.18) ▪ Lazares Companies Subdivision (ILR: 0.93) ▪ Archway Commons (previously commercial / industrial; developed at 16.9 du/ac)	0.93	14	

Summary

Of the 430 sites included in the Sites Inventory, 342 are vacant and 88 are nonvacant. The predominant existing use of sites is single-family with extra land (81 sites), followed by commercial (4 sites), and multifamily with extra land or mobile home park (3 sites). The County anticipates development of these uses, particularly in West Modesto, to accommodate high-density residential uses. The County will continue to advocate for residential uses in these areas in line with the vision expressed in the County's General Plan, which strongly advocates for high-density residential and a variety of mixed uses in these areas. Nonvacant sites included on the Sites Inventory have comparable predevelopment characteristics with redevelopment potential for high density residential.

The County does not consider existing uses in these areas to impede housing development. While many of these sites are likely to be redeveloped in their entirety, the estimated capacity of all sites with an existing single-family home is based on the amount of land available for development if the existing residences remained on the site. Table 5-47 summarizes the existing uses of non-vacant sites.

Table 5-47 Existing Uses of Inventory Sites

Existing Use	Number of Sites	Gross Acreage	Available Acreage	Number of Units
Single-family with extra Land	81	154.01	128.4	1,005
Multifamily or mobile home park with extra Land	3	6.32	4.40	88
Commercial	4	4.48	4.48	88
Vacant	341	444.93	444.08	1,228
Total	**429**	**609.74**	**581.36**	**2,409**

Table 5-48 summarizes the conditions on each of the nonvacant sites included in the Sites Inventory.

Table 5-48 Nonvacant Sites Analysis Summary

Site Address	APN	Single Family w/ Extra Land	Vacant Buildings	ILR of <1.0	Year Built (>30 years old)	FAR < 0.30
4141 SPERRY RD	024014007	Yes	No	1.35	1970	0.06
4109 ZEERING RD	024015003	Yes	No	0.00	1944	0.09
4109 SPERRY RD	024015010	Yes	No	1.52	1953	0.02
4009 ZEERING RD	024015026	Yes	No	0.0	1920	0.03
4140 N SANTA FE AVE	024015028	Yes	No	0.92	1947	0.03
4216 SPERRY RD	024016004	Yes	Yes	0.48	1920	0.01
4308 SPERRY RD	024016009	Yes	No	0.96	1935	0.02
4100 SPERRY RD	024017003	Yes	No	0.98	1950	0.01
3640 GRATTON RD	024024016	Yes	No	2.04	1925	0.01
3613 MERCED AVE	024031035	Yes	No	0.00	1915	0.02
4124 E ZEERING RD	024059019	Yes	No	0.00	1930	0.05
451 B ST	133002001	Yes	No	0.00	1955	0.04
401 B ST	133002018	Yes	No	1.63	1930	0.02
420 B ST	133003007	Yes	No	0.31	1950	0.03
4841 2ND ST	133007045	Yes	No	0.71	1930	0.01

Site Address	APN	Single Family w/ Extra Land	Vacant Buildings	ILR of <1.0	Year Built (>30 years old)	FAR < 0.30
13255 4TH ST	019045037	Yes	No	0.76	1956	0.02
13248 LAKE RD	019045056	Yes	No	1.89	1988	0.02
4021 ANNA AVE	045014004	Yes	No	0.00	1945	0.05
4212 ANNA AVE	045014015	Yes	No	0.00	1945	0.03
4204 ANNA AVE	045014016	Yes	No	0.00	1945	0.04
456 BYSTRUM RD	038008009	Yes	No	0.00	1950	0.05
805 SOUZA AVE	038011006	Yes	No	0.00	1938	0.03
901 LOMBARDO AVE	038015018	Yes	No	4.28	1953	0.05
916 SONORA AVE	038016008	Yes	No	0.00	1940	0.02
923 LATIMER AVE	038016009	Yes	No	0.00	1930	0.04
915 LATIMER AVE	038016010	Yes	No	0.00	1938	0.02
850 SONORA AVE	038016045	Yes	No	0.00	1983	0.03
854 SONORA AVE	038016046	Yes	No	0.00	1983	0.03
11727 RODDEN RD	010001079	Yes	No	0.00	1943	0.00
10661 DIXON RD	010021095	Yes	No	0.89	1974	0.00
624 STEARNS	064010010	Yes	No	1.62	1974	0.00
2449 E SERVICE RD	053036006	Yes	No	2.07	1910	0.02
859 KENWOOD AVE	042024032	Yes	Yes	0.00	1925	0.06
924 PANAMA DR	030015027	Yes	No	0.00	1925	0.05
1000 PANAMA DR	030015028	Yes	No	0.00	1920	0.04
1004 PANAMA DR	030015029	Yes	No	0.00	1925	0.05
1008 PANAMA DR	030015030	Yes	No	0.00	1925	0.05
719 SUTTER AVE	037031015	Yes	No	0.00	1960	0.04
620 COLORADO AVE	037039016	Yes	No	0.00	1935	0.02
615 LEON AVE	037039027	Yes	No	0.00	1938	0.04
601 LEON AVE	037039031	Yes	No	0.00	1927	0.05
527 LEON AVE	037039032	Yes	No	0.00	1935	0.02
517 LEON AVE	037039035	Yes	No	0.00	1920	0.03
528 ROSELAWN AVE	037040012	Yes	Yes	0.00	1914	0.02
507 COLORADO AVE	037040028	Yes	No	0.00	1927	0.03
532 SUNSET AVE	037041014	Yes	No	0.00	1918	0.02
519 ROSELAWN AVE	037041035	Yes	No	0.00	1935	0.03
812 COLORADO AVE	037032011	Yes	Yes	0.56	1927	0.03
718 COLORADO AVE	037031011	Yes	No	0.60	1942	0.01
1406 SOUTH AVE	037030002	Yes	No	0.00	N/A	0.00
3833 LESTER RD	024012004	Yes	No	0.00	1960	0.01
3817 LESTER RD	024012005	Yes	No	0.00	1909	0.01
3325 KERN ST	024033002	Yes	No	0.00	1950	0.01
4165 MAIN ST	024033026	Yes	No	0.00	1950	0.02
3225 STORY RD	024025004	Yes	No	0.94	1971	0.02

Site Address	APN	Single Family w/ Extra Land	Vacant Buildings	ILR of <1.0	Year Built (>30 years old)	FAR < 0.30
124 S ABBIE ST	133017002	Yes	No	0.00	1972	0.02
114 S ABBIE ST	133017003	Yes	No	0.00	1949	0.03
100 S ABBIE ST	133017004	No	No	3.22	1967	0.08
32 S ABBIE ST	133017005	No	No	2.21	1907	0.05
4701 NORMA WAY	045021019	Yes	No	0.00	1947	0.02
4701 MAUD AVE	045021020	Yes	No	0.00	1955	0.01
854 PECOS AVE	038039016	Yes	No	0.86	1932	0.02
838 PECOS AVE	038039031	Yes	No	0.00	1938	0.02
1809 E HATCH RD	039025019	Yes	No	0.00	1961	0.02
822 BYSTRUM RD	038017041	No	No	0.30	1948	0.01
4573 HOPE LN	135041011	Yes	No	0.00	1939	0.03
207 SPENCER AVE	030004005	Yes	No	0.00	1915	0.02
227 SPENCER AVE	030004009	Yes	No	0.00	1925	0.03
323 SPENCER AVE	030004013	Yes	No	0.00	1925	0.03
333 SPENCER AVE	030004014	Yes	No	0.00	1947	0.02
337 SPENCER AVE	030004015	Yes	No	0.00	1924	0.03
523 MAZE BLVD	030005001	Yes	No	0.00	1936	0.02
531 MAZE BLVD	030005003	Yes	No	0.00	1925	0.02
539 MAZE BLVD	030005004	Yes	No	0.00	1986	0.03
128 SPENCER AVE	030005011	Yes	No	0.00	1926	0.03
204 SPENCER AVE	030005012	Yes	No	0.00	1929	0.03
226 SPENCER AVE	030005015	Yes	No	0.00	1924	0.03
310 SPENCER AVE	030005016	Yes	No	0.00	1960	0.01
320 SPENCER AVE	030005018	Yes	No	0.00	1915	0.04
533 TRUMAN AVE	030005026	Yes	No	0.00	1946	0.05
415 SPENCER AVE	030008003	Yes	No	0.00	1948	0.02
511 SPENCER AVE	030008006	Yes	No	0.00	1920	0.03
405 SPENCER AVE	030008016	Yes	No	0.00	1920	0.02
1427 RITSCH LN	037004061	Yes	No	0.00	N/A	0.00
1511 CROWS LANDING RD	056011028	No	No	0.59	1963	0.04
1627 CROWS LANDING RD	056017021	No	No	0.74	1956	0.04
1715 CROWS LANDING RD	056018002	No	No	0.84	1968	0.06
1943 CROWS LANDING RD	056048052	No	Yes	0.29	1980	0.23

5.5.3 Suitability of Publicly Owned Sites

The Sites Inventory identifies two sites that are owned by the County listed in Table 5-49. These sites are vacant and are considered highly developable.

The County will maintain a list of publicly owned properties with potential for residential development. Additionally, the County will prioritize the development of these parcels for affordable

housing development, particularly for extremely low-income households and residents with special housing needs, such as seniors and persons with disabilities.

Per Program 3-1, the County will follow all requirements of the Surplus Land Act, Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5, including holding a public hearing designating the properties as "surplus properties" under California law.

The County anticipates parcel 133-017-006 in Empire (formerly the site of the Empire Community Resource Center) becoming available for development by the end of 2024. As of December 2024, the County is moving forward with negotiations with interested parties to dispose of the site in Empire. Negotiations are anticipated to occur through July 2025. The County anticipates disposal of this site by the end of 2025. The County anticipates parcels 045-064-044, 045-064-057 and -058 in Keyes will start the SLA process in January 2026. There are no known conditions (e.g., governmental, nongovernmental, or environmental constraints) to preclude development on these sites.

County staff is currently going through the Surplus Land Act process to develop the former Empire Community Resource Center site (a County-owned site adjacent to 32 and 100 South Abbie Street) with high-density residential units; the County has also reached out to the surrounding property owners to discuss the possibility of including the four parcels south of the County's property as part of a larger residential project on Abbie Street. This project could develop an affordable apartment complex on the County-owned site as well as the rear portion of APNs 133017002, 133017003, 133017006, 133017004, and 133017005.

Table 5-49 Publicly Owned Sites

APN	Community	Ownership	General Plan	Zone	Existing Use	Acres	Realistic Density (du/acre)	Realistic Capacity (units)
045066059	Keyes	County	LDR	R-1	Vacant	0.70	5.5	3
133017006	Empire	County	HDR	R-3*	Vacant	0.96	20	19
Total Units								**22**

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

5.6 Availability of Infrastructure and Services

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

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

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

While the availability of sewer and water infrastructure is an issue for development in some areas of the County, the combination of existing sewer and water capacity and planned system expansion and improvements will result in adequate capacity and adequate infrastructure to serve future development on the sites identified in this housing Sites Inventory. Sites in areas not already or soon served by municipal water and sewer systems were not allocated to fulfill the Couty's RHNA for units affordable to lower- or moderate-income households.

The following is a description of each of the community service districts that serve unincorporated areas. Table 5-50 summarizes the availability of infrastructure in the unincorporated County.

Table 5-50 Availability of Infrastructure

Community	Water Provider	Sewer Provider	Adequate Water Capacity	Adequate Sewer Capacity
Airport	City of Modesto	City of Modesto	Category 1	Category 1
Bret Harte	City of Modesto	City of Modesto	Category 1	Category 2
Crows Landing	Crows Landing CSD	Individual Septic	Category 3	Category 3
Del Rio Community Plan Area I	City of Modesto	Individual Septic and Package Treatment	Category 1	Category 2
Del Rio Community Plan Area II	Individual Well	Individual Septic	Category 3	Category 3
Denair	Denair CSD	Denair CSD	Category 1	Category 1
Diablo Grande	Western Hills Water District	Western Hills Water District	Category 1	Category 1
Empire	City of Modesto	Empire Sanitary District	Category 1	Category 1
Grayson	City of Modesto	Grayson CSD	Category 2	Category 2/3
Hickman	City of Waterford	Individual Septic and Package Treatment	Category 1	Category 3
Keyes	Keyes CSD	Keyes CSD	Category 1	Category 1
North Ceres	City of Ceres / City of Modesto	City of Ceres	Category 1	Category 1

Community	Water Provider	Sewer Provider	Adequate Water Capacity	Adequate Sewer Capacity
East Oakdale	Oakdale Irrigation District	Individual Septic and Package Treatment	Category 1	Category 3
Salida Community Plan	City of Modesto	Salida Sanitary District	Category 1	Category 1
Salida Community Plan Amendment Area (no sites identified)	Individual Well	Individual Septic	Category 3	Category 3
South Ceres	City of Ceres	City of Ceres	Category 1	Category 1
Turlock (Kenwood/Star)	City of Turlock	Individual Septic (Planned Connections to City of Turlock)	Category 1	Category 2
Valley Home	Individual Well	Individual Septic	Category 3	Category 3
West Modesto	City of Modesto	City of Modesto (Sewer improvement project underway)	Category 1	Category 2

Category 1 – Adequate as is to support development projected in the Sites Inventory.

Category 2 – Adequate, however some improvements are likely.

Category 3 – Inadequate as is, requires significant improvements.

Note: No lower- or moderate-income units are located in areas classified as Category 3.

5.6.1 Sanitary Districts

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

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

5.6.2 Community Service Districts

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

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

resources, and infrastructure. Significant intensification of development within district boundaries may require expansion of water and sewer infrastructure.

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

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

5.7 Environmental Constraints

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

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

Out of the sites identified in the Sites Inventory, those located in Diablo Grande and West Modesto are subject to environmental constraints as described below. Excluding Diablo Grande and West Modesto, there are no known barriers on sites located in any of the other unincorporated communities previously discussed related to shape, access, contamination, easements, property conditions, likelihood of disposition of rights-of-way, Williamson Act contracts, conservation easements, or environmental contamination.

5.7.1 Wildfire

The easternmost edge of the County and areas west of Interstate 5 are areas in fire hazard severity zones. Diablo Grande is a community in the mountainous region of western Stanislaus County, where 112 sites identified for above moderate-income housing lie in high fire hazard severity zones. No sites identified for housing development affordable to lower- or moderate-income households are in areas with elevated risk of wildfire. These sites are zoned for low-density, estate-type residential development according to the Diablo Grande Specific Plan.

Of the CDPs in the County, Orange Blossom and Knights Ferry are within a moderate fire severity zone and Diablo Grande is within a high fire hazard severity zone. However, no sites identified for housing development affordable to lower- or moderate-income households are in areas with elevated risk of wildfire. The potential impacts of a wildfire would not preclude development of housing in Stanislaus County.

5.7.2 Drought

It is unlikely that drought would impact the physical structures of buildings and facilities across Stanislaus County. Water availability may be impacted by drought, and is discussed above in Section 5.6.The potential impact of a drought would not preclude development of housing in the County.

5.7.3 Flood

In West Modesto, sites located in the southern portion of the community are located within the flood hazard area due to their proximity to the Tuolumne River. Of the sites identified in West Modesto, 11 sites are located within the one percent annual flood hazard zone and six are located in the 0.2 percent annual flood hazard zone. No sites with known flood risk will be rezoned for higher-density residential. In western parts of Stanislaus County, there is a higher number of acres located within the San Joaquin River floodplains. There has been little to no development within the floodplains. The community of Grayson borders the boundary of the 100-year floodplain. The County is continually working to reduce flooding risks by enforcing Federal floodplain regulations when reviewing building permits. While there is a small percentage of current and future housing located in the floodplain, flooding is not a constraint to development on any sites Identified in the Sites Inventory.

5.7.4 Williamson Act

Much of the land within the County is under Williamson Act contracts. However, no housing opportunity sites identified in the Sites Inventory are subject to Williamson Act restrictions. The Williamson Act would not preclude development on any sites Identified in the Sites Inventory.

5.7.5 Environmental Hazards and Toxic Releases

The Sites Inventory does not include any sites with known hazardous waste contamination. As such, environmental contamination or toxic release does not preclude development on any sites identified in the County's Sites Inventory. As discussed in Chapter 4, Housing Constraints, the County ensures that the necessary steps are taken to clean up residual hazardous wastes on any contaminated sites proposed for redevelopment or reuse. If it is found that there is possible contamination on a site, soil evaluations are required as needed to ensure that risks are assessed, and appropriate remediation is provided. Developing housing on these sites can involve costs to remediate contaminated soil or groundwater or demolish buildings containing hazardous materials. Remediation of hazardous material that requires removal can result in additional costs that may pose a constraint on development. The remediation cost is typically on the developer to address the clean-up. Grants for brownfield assessment are available through the U.S. Environmental Protection Agency.

5.8 Financial Resources for Affordable Housing

5.8.1 Existing Financial Resources

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

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

Community Development Block Grant (CDBG)

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

Projects proposed by the jurisdictions must meet the objectives and eligibility criteria of CDBG legislation. The primary CDBG objective is the development of viable urban communities, including decent housing, a suitable living environment, and expanded economic opportunity, principally for persons of low- and moderate-income. Each activity must meet one of the three following national objectives:

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

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

Emergency Solutions Grant (ESG)

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

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

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

Home Investment Partnership Program (HOME)

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

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

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

Permanent Local Housing Allocation (PLHA)

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

5.8.2 Potential Financial Resources

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

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

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

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

5.9 Administrative Resources

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

5.9.1 County of Stanislaus

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

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

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

The Planning Services provides administration of the County's General Plan; Zoning and Subdivision Ordinances; Stanislaus County Planning Commission and Airport Land Use Commission; land use

entitlement permitting; environmental reviews/compliance; and the local administration of the Surface Mining and Reclamation Act and California Land Conservation Act (Williamson Act).

5.9.2 San Joaquin Valley Regional Planning Agencies Policy Council

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

5.9.3 Non-Profit Organizations

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

5.10 Opportunities for Energy Conservation

Stanislaus County, through the Sustainable Communities Planning Grant funds and in partnership with various cities, developed the Stanislaus Regional Sustainability Toolbox (RST). This toolbox includes multiple planning tools to achieve greenhouse gas reductions in the region. Some of the planning tools include City of Hughson Model Climate Action Plan, City of Newman Non-motorized Transportation Plan, City of Patterson Sustainable Development Ordinance, and a County-wide Greenhouse Gas Emissions Inventory.

According to the US Department of Energy, in 2015, 55 percent of energy was used for heating and cooling. Water heating, appliances, electronics, and lighting accounted for the remaining 45 percent of total consumption. These numbers hold true in Stanislaus County considering the average temperatures range from 38 degrees in the winter to over 100 degrees in the summer, with residents spending an average of $126 per month on electricity[2]. As energy consumption runs high, there are many opportunities for active and passive energy conservation such as: the design of new housing and the rehabilitation of existing homes, the choice of appliances, the use of construction materials, and the location and types of landscaping materials. Reducing home energy costs and conservation play a part in housing affordability. Examples of energy conservation policies and standards include but are not limited to the following:

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

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

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6 Housing Plan

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

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

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

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

Policies

1A **Support Safe and Livable Housing.** The County shall support code enforcement efforts in responding to complaints and ensuring that existing housing meets adopted code requirements that set forth acceptable health and safety standards for residential units, as the County is required to enforce existing housing and building codes.

1B **Support the Preservation of Existing Single-Family Housing Occupied by Lower-income Households.** The County shall preserve the existing single-family housing stock occupied by lower-income households by providing rehabilitation assistance for single-family, owner-occupied units, including manufactured homes and mobile homes.

1C **Provide Residential Rehabilitation Opportunities.** The County will partner with public and private agencies to provide funding support for residential rehabilitation programs to improve housing quality and conditions, ensuring the safety, habitability, and enhanced living standards for lower-income households.

1D **Preserve At-Risk Units and Naturally Occurring Affordable Housing.** The County will seek to avoid the loss of publicly assisted affordable housing units and/or housing units occupied by lower-income households and the resulting displacement of low-income residents by providing funds, as available, to nonprofit developers to be used for the acquisition of subsidized housing developments at risk of converting to market rate units.

1E **Code Compliance.** The County shall continue to encourage the rehabilitation of substandard residential properties by homeowners and landlords by responding to citizen complaints regarding potential code violations and referring residents to appropriate resources, as the County is required to enforce existing housing and building codes.

Programs

Program 1-1 Home Rehabilitation Program

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

Actions	Objective and Timeframe
Action 1-1a: Provide housing rehabilitation assistance for owner-occupied households, including mobile homes, with a focus on vulnerable and lower-income households including seniors on fixed incomes and persons with disabilities. (Environmental Justice)	Provide grants and/or loans for home repairs of at least four owner-occupied housing units per year for a total of 32 lower-income housing units during the planning period. On an annual basis, focus marketing efforts and funding/resources in neighborhoods with higher concentrations of units in need of rehabilitation (i.e., Airport, Empire, North Ceres, South Ceres, Turlock, areas of West Modesto, Crows Landing, Denair, Grayson, Hickman, Salida, and Valley Home).
Action 1-1b: Provide property owners of substandard or deteriorating housing with rehabilitation program resources to assist with repairs and rehabilitation particularly in Racially and Ethnically Concentrated Areas of Poverty (RECAPs) and Racially Concentrated Areas of Affluence (RCAAs). (Environmental Justice)	Make program materials (e.g., fact sheets, brochures) available on a case-by-case basis upon property owner inquiry or at the time of code enforcement action.
Action 1-1c: Continue using rehabilitation funds for the testing and mitigation of housing units for lead-based paint pursuant to the Lead-Based Paint Hazard Reduction Act of 1992.	Continue to offer lead-based paint removal as part of the rehabilitation program. Develop marketing materials by December 2025. Focus marketing efforts in older neighborhoods where older homes more likely to contain lead are located (i.e., Rouse/Colorado, Bret Harte, and Airport).
Action 1-1d: Partner with the Stanislaus County Health Services Agency to develop and disseminate educational materials and programs focused on lead risk in housing to children, especially in Disadvantaged Communities. (Environmental Justice)	Develop materials to be disseminated together with rehabilitation program materials and to service providers by December 2025.
Action 1-1e: Work with local nonprofit organizations and community groups to expand and spread awareness on home and accessibility rehabilitation programs.	Provide program materials (e.g., fact sheets, brochures) to nonprofit organizations and community groups by June 2026 and on an ongoing basis, and attend at least one public event per year to publicize rehabilitation programs. Develop marketing materials by October 2026. Focus marketing efforts in neighborhoods with higher concentrations of senior residents (i.e., Rouse/Colorado, Bret Harte, and Airport).
Action 1-1f: Modify the housing rehabilitation program polices, as allowed by funding program guidelines, to assist lower-income homeowners in acquiring the necessary upgrades required to protect against indoor air pollution and poor drinking water quality associated with pesticide pollution. (Environmental Justice)	Modify the housing rehabilitation program policies to use funds, as allowed by funding program guidelines, for air and water filtration by December 2025, with a goal of improving filtration in 25 percent of the units rehabilitated. Focus marketing on neighborhoods with higher pollution burden (i.e., Rouse/Colorado, Bret Harte, and Airport).
Action 1-1g: Explore use of available state and federal funds for code enforcement efforts for rental housing rehabilitation to ensure all rental units meet health and safety standards.	Prioritize inspections and enforcement in areas with high concentrations of rental housing complaints and known substandard conditions, with the goal of inspecting at least 25 rental units annually.
Implements the Following Policies	1B, 1C, 1D
Responsible Agency	County Planning & Community Development County Health Services Agency
Funding Sources	Federal and State Funding

Program 1-2 Residential Compliance Program

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

Actions	Objective and Timeframe
Action 1-2a: Evaluate the County Code for compliance with Section 17970.5 of the California Health and Safety Code and, if necessary, amend the County Code to require that upon a rental tenant complaint, a) a mandatory inspection be conducted and b) specific actions identified that can be taken to mitigate any hazards present. Develop internal policies aligned with Health and Safety Code Sections 17920.10 and 17920.3 to ensure inspections are conducted with the same urgency as final building inspections under Section 110 of the California Building Code. (Environmental Justice)	If determined necessary, amend the County Code and develop internal policies by December 2025. The goal shall be to inspect and specify actions to be taken within 30 days of the complaint being received.
Implements the Following Policies	1A, 1E
Responsible Agency	County Planning & Community Development County Department of Environmental Resources
Funding Sources	Department Revenues

Program 1-3 Building and Design Standards for Energy Efficiency

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

Actions	Objective and Timeframe
Action 1-3a: Emphasize the incorporation of active and passive energy conservation features such as energy-efficient appliances; heating/cooling systems; windows, doors, and skylights; building materials; building/window orientation; and use of landscape materials in new and rehabilitated County-assisted affordable housing.	Amend funding policies to require the use of energy-efficient features, subject to funding guidelines, into all assisted dwelling units by June 2026. For rehabilitated units, application shall be subject to features being replaced or upgraded. Aim to assist two rehabilitation projects per year.
Action 1-3b: Partner with other agencies and energy providers who disperse information and/or offer programs and incentives to increase public awareness and utilization of energy conservation practices.	Identify partners and establish partnership opportunities to disperse information by December 2025. Coordinate with established partners annually to disperse information to homeowners, with specific outreach efforts in Low Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport). Reach at least 5,000 households throughout the planning period, and through publicly available information or estimates given by service providers, track the number of households that take advantage of programs or incentives offered.
Implements the Following Policies	1A
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 1-4 Preservation of At-Risk Affordable Housing

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

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

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

Policies

2A **Homeownership Housing:** The County shall encourage the development of ownership housing and assist tenants to become homeowners to increase owner-occupancy rate within the parameters of federal and state housing laws.

2B **Provide Incentives for Affordable Housing:** The County shall promote the use of density bonuses and waive or reduce park, transportation, and other impact fees to facilitate the development of new housing for extremely low-, very low-, and low-income households.

2C **Integration of Affordable Housing:** The County shall encourage a mix of affordability levels in residential projects and encourage the dispersal of such units to achieve greater integration of affordable housing throughout the community.

2D **Create Access to Capital:** The County shall support efforts to create access to capital needed to increase housing development and improve housing affordability in Stanislaus County. The County shall identify new funding sources and strategies to support affordable housing.

2E **Regional Housing Needs Allocation (RHNA):** The County will support future Stanislaus County Council of Governments (StanCOG) RHNA efforts that equitably recognize the County's contribution to housing developments within city limits through the reduction in County Impact Fees for affordable housing development and for partnerships to develop affordable housing using County funds within the incorporated cities.

2F **RHNA Transfer:** The County shall seek to negotiate agreements with any city proposing to annex land utilized by the County to meet its RHNA obligations to transfer a share of the StanCOG RHNA from the unincorporated area to the annexing city.

Programs

Program 2-1 Affordable Housing Development Assistance

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

Actions	Objective and Timeframe
Action 2-1a: Actively promote sites to qualified housing developers for affordable housing development opportunities through Requests for Proposals (RFPs) with emphasis on promoting housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, multi-generational households, low-income, and/or persons with disabilities.	By December 2025, release an RFP and by the end of the planning period release four RFPs for available sites for affordable housing and provide information on housing incentives and programs to support the entitlement of at least 250 housing units affordable to extremely low-, very low-, and low-income households in the County during the planning period. Focus efforts in neighborhoods with higher concentrations of special needs populations (i.e., Rouse/Colorado, Bret Harte, and Airport), with at least 75-125 affordable units targeted in High Resource and/or above moderate-income areas.

Actions	Objective and Timeframe
Action 2-1b: Monitor availability of state and federal funding and support developers with their applications for incentives and funding programs that provide financial assistance to develop affordable housing for special needs populations.	Annually, review proposed development budgets and schedules for at least one County-funded affordable housing project (consistent with Action 2-1a) to identify the need for County support with funding applications. Upon request, provide technical assistance for non-County-funded affordable housing development projects.
Action 2-1c: Assist developers, faith-based and nonprofit organizations, or other qualified private sector interests with the application and development of projects. Allocate resources in the form of a dedicated County staff member to assist with entitlements, site identification, public facility fee waivers, and density bonuses. Develop an informational packet and conduct outreach to religious/faith-based institutions in high- and highest-opportunity areas in the county to educate them about recent changes in State law (e.g., the Affordable Housing on Fair Lands Act [SB 4]). The County will also connect interested landowners with experienced nonprofit affordable housing developers, provide technical assistance to identify opportunities for funding, reducing permit fees, and reducing development standards.	Assist in supporting the development of at least 250 subsidized very low- and low-income income units over the planning period. Subject to funding availability, provide development subsidy for at least three affordable housing developments by December 2029. Prioritize subsidies for financing for rental housing units affordable to lower-income households and households with special needs, and projects in moderate- or above-moderate resource areas. Focus efforts in neighborhoods with higher concentrations of special needs populations and lower-income residents (i.e., Rouse/Colorado, Bret Harte, and Airport), with at least 75 to 125 affordable units targeted in high-resource and/or above moderate-income areas. County staff member to assist as needed on an ongoing basis. Create and disseminate informational packet by December 2026 and conduct outreach to religious/faith-based institutions biennially, specifically pertaining to SB 4. Provide technical assistance on a project-by-project basis.
Action 2-1d: Ensure a streamlined process for affordable housing development that provides one-stop access to staff from the various County agencies involved in the development process.	Maintain current information on the development process, potential fee reductions, and the density bonus program on the County's website.
Action 2-1e: Work with the Stanislaus Urban County partners to close out the Neighborhood Stabilization Program (NSP) in a manner that retains the County's portion of the funds for supporting housing, including infrastructure needed to support the preservation of existing housing and the development of new housing opportunities.	Ongoing.
Action 2-1f: Continue to support partnerships with Community Development Corporations as a means of attracting different sources of funding and creating innovative funding models to support housing development.	Meet with at least one Community Development Corporation annually.
Action 2-1g: As authorized by the Board of Supervisors, complete the necessary environmental review needed to allow for housing development within the Salida Community Plan.	Conduct the environmental review and complete environmental review within three years of Board of Supervisors authorization.
Action 2-1h: Modify, as needed, the Public Facilities Fee waivers or deferrals to apply to farmworker housing occupied by moderate income farmworkers (between 80 and 120 percent of AMI).	Work with consultant to develop and present modifications to the Public Facilities Fees Committee by February 2026. Recommended amendments will go to the Board of Supervisors for consideration.
Action 2-1i: Provide technical assistance to prospective developers interested in developing housing for extremely low-income (ELI) households. Defer Public Facility Fees for housing developments providing ELI housing. Develop and advocate for an update to RFP scoring criteria to prioritize technical assistance for	Hold at least two meetings for developers interested in affordable housing for ELI households to provide technical assistance. Hold meetings in and regarding neighborhoods with higher concentrations of ELI households (i.e., Rouse/Colorado, Bret Harte, and Airport). Defer the PFF fees for two housing developments providing 50 percent or

Actions	Objective and Timeframe
affordable housing developments providing 50 percent or more ELI housing units.	more ELI units. Recommend a scoring preference for ELI priority to the Community Development Committee by 2026.
Implements the Following Policies	2B, 2C, 2D, 2E
Responsible Agency	County Planning & Community Development County Behavioral Health and Recovery Services County Community Services Agency Chief Executives Office
Funding Sources	Federal, State, and Local Funding

Program 2-2 Density Bonus

The County offers residential density bonuses to encourage affordable housing development. The County can grant a number of incentives in exchange for a portion of a development being affordable to lower- and moderate-income households, senior or student housing, or installing on-site childcare. These incentives include density bonuses over the otherwise allowed maximum density, reductions in parking standards, regulatory concessions, and waivers to development standards. These units must remain affordable for a period of no less than 55 years and each project must enter into an agreement with the County and be monitored by the Housing Services Division to ensure compliance. The County's current Density Bonus was adopted in 2015 and must be updated to be consistent with State law.

Actions	Objective and Timeframe
Action 2-2a: Update the Density Bonus Ordinance to bring it into compliance with State law and remove the requirement for Planning Commission approval of Density Bonus applications.	Adopt updated Density Bonus Ordinance by December 2025.
Action 2-2b: As part of Density Bonus Ordinance update, discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond State law is appropriate for the County. This is specific to projects that already meet the State required percentage of affordable units at the time of application.	Meet with four qualified housing developers by December 2025, prior to updating the Density Bonus Ordinance.
Action 2-2c: Ensure that housing developers are informed about the County's density bonus program during pre-development conferences, inquiries, and at application and highlight the additional development potential available.	Ongoing on a case-by-case basis.
Action 2-2d: Provide technical assistance to developers on how to use Density Bonus incentives. Promote density bonus for childcare facilities.	Meet with one qualified developer annually to provide information on the County's Density Bonus program. Maintain current information on the County's website, including notice of the Density Bonus update, within one month of adoption.
Action 2-2e: Adopt a local density bonus ordinance that exceeds state minimums. Provisions may include higher bonuses (e.g., up to 100 percent for 100 percent affordable projects), additional incentives (e.g., reduced parking, height and setback waivers), or incentives for diversifying affordability and/or family-sized units.	Adopt enhanced density bonus ordinance by December 2026. Facilitate the approval of two projects under enhanced provisions during the planning period.

Actions	Objective and Timeframe
Implements the Following Policies	2B
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 2-3 Housing Choice Vouchers

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

Actions	Objective and Timeframe
Action 2-3a: Refer HCV holders to a list of properties compiled by SRHA that are actively participating in the Housing Choice Voucher Program.	Provide a link to the SRHA "For Rent" directory on the County's website by December 2025.
Action 2-3b: Ensure potential and existing tenants and landlords or property managers are informed of the California Fair Employment and Housing Act (FEHA) prohibiting housing discrimination based on source of income (including housing choice vouchers). Provide tenant/landlord counseling services and conduct ongoing outreach to inform tenants of their fair housing rights.	Require any County-contracted fair housing providers to disseminate information about FEHA by December 2025. Provide tenant/landlord counseling services upon request. Work with fair housing providers and community partners to conduct outreach to tenants regarding their fair housing rights at least twice per year.
Action 2-3c: Partner with the Stanislaus Regional Housing Authority (SRHA) to increase landlord participation in HCV programs by conducting landlord education and outreach on the program and source of income discrimination.	Partner with SRHA to make HCV program fact sheet available at County offices serving the general public and on the County's website by January 2026. Provide fact sheets to property owners seeking building permits for Accessory Dwelling Units (ADUs). Focus outreach in Higher Resource areas, such as Salida, East Oakdale, and Hickman.
Action 2-3d: Provide support to SRHA as necessary to seek additional funding that can be used, in addition to HCV funds, to provide subsidies to lower-income households to bring monthly rents in line with affordability guidelines, or help with moving costs, security deposits, or application fees.	Meet with SRHA by June 2026 to identify funding needs and opportunities. Aim to assist 15 households annually.
Implements the Following Policies	2C
Responsible Agency	County Planning & Community Development County Community Services Agency
Funding Sources	Federal and State Funding

Program 2-4 Support Homeownership Opportunities

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

Actions	Objectives and Timeframe
Action 2-4a: Continue to identify and pursue federal, state, and regional programs to move very low-, low-, and moderate-income families from renters to homeowners, such as HUD's Homeownership Voucher Program, down payment and closing cost assistance, mortgage financing, and mortgage credit certificates for homebuyers.	Annually identify potential funding sources and, where eligible, pursue funding either directly or by supporting other agencies in their efforts to secure funding. Work with partner agencies to establish an information network connecting potential homeowners to funding sources. Focus outreach to areas at high risk of displacement, and Lower Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport).
Action 2-4b: Partner with local nonprofit agencies to provide pre-purchase home buying counseling for residents to provide information on mortgage readiness, fair housing education, budgeting for a mortgage payment, credit education, money management, and identifying and avoiding predatory lending.	Provide homebuying counseling to at least 20 residents annually. Coordinate with at least one non-profit organization or employment-related organization, such as teachers' associations, school districts, and community-based service providers, to increase awareness of, and access to, housing resources and financial planning services. Focus outreach to areas at high risk of displacement, and Lower Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport).
Implements the Following Policies	2A
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 2-5 Housing Trust Fund

To increase funding available for affordable housing development and/or maintenance, the County will study the feasibility of establishing a Housing Trust Fund.

Actions	Objective and Timeframe
Action 2-5a: Conduct a feasibility analysis of establishing or joining a local Housing Trust Fund. Study should include analysis of available resources, potential for impact, prioritization of use of funds (i.e., income targeting, rental vs. ownership projects).	Complete feasibility analysis by December 2025. Depending on results of analysis, establish a trust fund or partner with an existing trust fund by December 2026. In developing the program policies, advocate for the inclusion of a scoring system that includes a bonus for projects in Lower Resource areas. Aim to have the County's funding assist at least eight lower-income households through the creation, rehabilitation, and/or preservation of units in the unincorporated area annually.
Implements the Following Policies	2D
Responsible Agency	County Planning & Community Development County Executive Office
Funding Sources	Federal and State Funding

Program 2-6 Regional Collaboration to Facilitate Housing Throughout Stanislaus County

Stanislaus County's Land Use Policies have long recognized the need to balance conservation of agricultural land with the need for urban development. While the County's General Plan identifies areas suitable for residential development, there are constraints to developing in the unincorporated areas and, as such, the County recognized that, with some exceptions, development may be better suited to occur within the incorporated areas.

To facilitate development of affordable housing countywide, the County offers deferrals and waivers of its Public Facilities Fees for qualified affordable housing projects to projects regardless of their locations (incorporated or unincorporated) and has partnered with cities and affordable housing developers to assist with the funding of housing developments located within cities. This monetary support has aided the capacity of cities to meet their RHNA obligation without a reduction in the County's overall RHNA obligation.

Recognizing that the need to increase housing opportunities of all types extends beyond jurisdictional boundaries, the County initiated the Housing Stanislaus Initiative in 2021 with the goal of developing a common vision for housing in Stanislaus County. The desired outcomes of the Initiative are to:

- Establish a shared understanding of the needs, challenges, and opportunities associated with housing in Stanislaus County;
- Develop a unified and actionable countywide vision and strategy framework inclusive of priorities, policies, and investments – for accelerating affordable and market-rate housing in Stanislaus County; and
- Identify and prioritize projects and programs for housing development.

Released in late 2023, strategies emerging from the Housing Stanislaus Initiative effort include the need to:

- Increase capacity within public agencies to keep pace with housing demand and enable more proactive engagement with developers;
- Pursue ongoing refinement of policies, procedures, and regulations that result in mutual benefit to community, public agency, and development applicant;
- Create access to capital, with a focus on capital for affordable and workforce housing;
- Prepare development plans for new areas appropriate for housing and for upgrading infrastructure in existing areas to accommodate housing use;
- Proactively engage developers and property owners of vacant and underutilized properties to encourage their pursuit of housing development; and
- Foster the development of a variety of housing types.

The emerging strategies reflect stakeholders of all interests that have shared their ideas on how local housing needs should be addressed.

Another County-led regional initiative has been Stanislaus 2030, a public-private partnership that aims to advance a shared vision for economic prosperity for all. The culmination of the first phase of Stanislaus 2030 was the 2022 publishing of the Investment Blueprint which includes the highest-leverage opportunities that will move the region's economy forward in the coming decades. The County's regional initiatives recognize the need for balance between jobs and housing in order to have a healthy and strong community.

The County's regional collaborations have also included over 20 years of partnership with various cities for HUD entitlement funding. As the lead entity for the Stanislaus Urban County, the County partners with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford for Community Development Block Grant and Emergency Solutions Grant funding. The City of Turlock and the Stanislaus Urban County have partnered as the City of Turlock/Stanislaus County HOME Consortium for HOME Investment Partnership (HOME) funding, with Turlock serving as the lead entity. Effective July 1, 2023, the County has taken on the role as the lead entity for the new Stanislaus

HOME Consortium; a continued partnership between the Stanislaus Urban County and the City of Turlock. The County is also the administrator of the Permanent Local Housing Allocation (PLHA) funding allocated by the State of California on the basis of the 2017 HUD entitlement to the Stanislaus Urban County.

Actions	Objective and Timeframe
Action 2-6a: Incorporate the sharing of the RHNA into the Local Agency Formation Commission (LAFCO) Sphere of Influence (SOI) negotiation process and annexation requests, recognizing the loss of County housing opportunities within the SOI area and County funding provided for housing projects within the city limits.	Establish criteria to be used by the County in negotiating RHNA sharing during LAFCO SOI negotiation and annexation requests by January 2026.
Action 2-6b: Participate in policy and program development with cities and other regional agencies to implement Housing Stanislaus strategies and to prioritize funding for affordable housing projects and infrastructure needed to preserve existing housing and support new housing.	Annually meet with staff from cities and other regional agencies to assess implementation of Housing Stanislaus strategies, share successful practices, and troubleshoot ongoing challenges.
Action 2-6c: Continue to collaborate with cities and other regional agencies to implement Stanislaus 2030.	Annually, evaluate opportunities to incorporate 2030 strategies into housing program implementation.
Action 2-6d: Assemble an ongoing advisory committee to monitor progress and foster implementation of the Housing Stanislaus Initiative strategies.	Establish an advisory committee by December 2025.
Action 2-6e: Continue coordination within County agencies (Behavioral Health and Recovery Services, Community Services Agency, and Planning) to address the continuum of housing needs (i.e., “homelessness to homeownership”).	Annually convene a meeting with all three County agencies to discuss respective housing programs/efforts to align efforts and identify and prioritize opportunities for housing mobility and place-based strategies (e.g., HCVs, anti-displacement policies, public investment in services and amenities) to improve community revitalization.
Action 2-6f: Continue to collaborate with funding agencies and non-profit housing developers and public service providers for the development of permanent supportive housing.	In coordination with the CSOC, annually provide an opportunity for non-profit housing developers, public service providers, and funding agencies to share successful practices, and troubleshoot ongoing challenges with an aim at expanding opportunities for collaboration within the community.
Implements the Following Policies	2E, 2F
Responsible Agency	County Planning & Community Development County Behavioral Health and Recovery Services County Community Services Agency Chief Executive Office
Funding Sources	Federal and State Funding; Department Revenues

Goal 3: Increase housing production by providing adequate sites for a variety of housing types and removing constraints to residential development.

Policies

3A **Diversity of Housing Types:** The County shall continue to implement land use policies and investigate amended policies that allow for a range of residential densities and housing types, prices, ownership, and size, including low-density, single-family uses; moderate-density townhomes; and higher-density apartments, condominiums, transit-oriented developments, live-work units, ADUs, and units in mixed-use developments.

3B **Provide and Maintain Adequate Sites to Accommodate the RHNA.** The County shall maintain appropriate land use designations and densities to accommodate an increased supply of housing units by type, cost, and size to meet its share of the regional housing need in alignment with countywide housing priorities.

3C **No Net Loss Zoning:** The County shall make findings related to the potential impact on the County's ability to meet its share of the regional housing need when approving discretionary entitlements to rezone residentially designated properties or develop a residential project with fewer units or at a higher income level than what is assumed for the site in the Housing Element Sites Inventory, consistent with zoning requirements in Government Code Section 65863.

3D **Streamline Housing Entitlement and Permitting Process.** The County shall streamline the housing approval and permitting process, particularly for affordable housing, throughout County departments.

3E **Clear Development Standards and Approval Procedures:** The County shall create and administer clear objective development standards and approval procedures for a variety of housing types, including, but not limited to, multi-family housing and emergency shelters.

3F **Facilitate Infill Development.** The County shall utilize infill development strategies to further develop and improve existing neighborhoods with the infrastructure to serve new development.

3G **Facilitate Strategic Development on Large Lots.** The County shall support and facilitate strategic development on large lots to promote cohesive and connected development that provides housing for a variety of household incomes and types.

3H **Residential Uses Close to Services:** The County shall encourage development of residential uses close to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.

3I **Compatible Development of Underutilized Sites:** The County shall encourage compatible residential development in areas with underutilized non-agricultural lands.

3J **Flexible Standards and Regulations:** The County shall allow flexibility within the County's standards and regulations to encourage a variety of housing types.

3K **Adaptive Reuse:** The County shall support innovative strategies for the adaptive reuse of residential, commercial, and industrial buildings to provide for a variety of housing types and residential uses.

3L **Residential Sites Inventory:** Maintain a vacant and underutilized residential Sites Inventory and assist residential developers in identifying land suitable for residential development.

3M **Preserve Multifamily Land Use:** Preserve the existing supply of land that allows multifamily dwellings and discourage development on such land at lower residential densities or with solely nonresidential land uses.

3N **Infrastructure Development.** The County shall continue to utilize its HUD CDBG funding allocation, and seek new funding, for infrastructure needed to upgrade existing areas as a means of preserving existing housing units and to accommodate new housing uses.

3O **Development within Cities:** The County will continue to work with cities to leverage available funding for the development of affordable housing projects throughout Stanislaus County.

3P **Public Facility Fee Waivers:** The County shall continue to waive Public Facilities Fees for qualified affordable housing projects to be developed throughout Stanislaus County.

Programs

Program 3-1: Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth

Stanislaus County's share of the Regional Housing Need Allocation (RHNA) is 2,475 units for the 2023-2031 Housing Element planning period. With anticipated pipeline projects and projected ADUs, a total of 437 units can be credited toward the County's RHNA. The remaining 2,072 RHNA units (574 very low-, 398 low-, 458 moderate-, and 608 above moderate-income units) must be accommodated through adequate sites planning.

Actions	Objective and Timeframe
Action 3-1a: Maintain an updated inventory of housing sites and actively promote sites available for lower- and moderate-income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations.	Publish on the County's website by June 2026 and update annually after submitting the County's Annual Progress Report every April.
Action 3-1b: Actively promote sites available for affordable housing development to potential developers, private and nonprofit organizations, and other interested persons and organizations.	Send annual notices promoting the Housing Elements Sites Inventory and offering to meet with developers to discuss affordable housing development.
Action 3-1c: Maintain an updated list of residential housing developments that have been submitted, approved, and denied throughout the housing cycle. Comply with California law regarding reporting requirements including, without limitation, annual reporting in accordance with Government Code Section 65400.	Publish by December 2025 and update annually as part of the Annual Progress Report.
Action 3-1d: The County has identified four parcels of County-owned land for the development of affordable housing: one in Empire (APN 133-017-006) and three in Keyes (APNs 045-065-044, 045-064-057, and 045-064-058). The County will comply with the Surplus Land Act in the disposition of all publicly owned land including those four parcels in the site inventory. Once agreements are in place for development and disposition of those properties, the County will prioritize entitlement processing and building permit issuance, and if appropriate, commit funding. Consistent with Program 3-2 (No Net Loss Zoning), the County will monitor all sites in the inventory and if development is not occurring in line with assumptions sufficient to keep on track to meet the share of the RHNA, the County will identify alternative sites.	**Development and disposition of publicly owned inventory sites:** The County expects to enter into a development and disposition agreement for the site in Empire (APN 133-017-006) by the end of 2025. The County will begin the development and disposition process for the Keyes site (APN 045-065-044, 045-064-057, and 045-064-058) in January 2026. Both sites are expected to yield 22 units of affordable housing. Report on identified surplus land in the Housing Element Annual Progress report on an annual basis. Monitor sites annually in accordance with Program 3-2. If needed, identify an alternative site in a

Actions	Objective and Timeframe
	Moderate or High Resource area, if possible, to yield at least 20 units, by January 2028.
Action 3-1e: Amend Zoning Ordinance to prohibit development of single-family dwellings in multi-family zones or land use designations.	Adopt Zoning Ordinance amendment by December 2025.
Action 3-1f: Proactively engage property owners of vacant and underutilized properties to encourage their pursuit of housing development.	Send annual notices to property owners of vacant and underutilized sites listed on the Sites Inventory offering to meet with them to discuss development options for their property.
Action 3-1g: Rezone sites with minimum density and development standards enumerated in Housing Element Law, Government Code Section 65583.2 (h) and (j), to facilitate achieving maximum densities and to accommodate the County's shortfall of capacity in the 6th cycle Housing Element Sites Inventory (972 lower-income units and 233 moderate-income units). Rezone sites shall be subject to the following standards: ▪ Permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. "By-right" means approval without discretionary review. ▪ Permit the development of at least 16 units per site. ▪ Establish a minimum density of 20 units per acre and a maximum density of at least 20 units per acre for all rezone sites to accommodate lower-income RHNA. ▪ Ensure that either: a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses; or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed uses, all sites designated for mixed uses must allow 100 percent residential use and require that residential uses occupy at least 50 percent of the floor area in a mixed-use project.	Complete all necessary General Plan and Zoning Ordinance text and map amendments by December 2025.
Action 3-1h Amend the Zoning Ordinance to remove the 6,000 square foot minimum lot size and 65-foot-wide lot width requirements in R-3 zones to allow housing to be developed at a higher density. Remove the minimum lot and depth requirements in R-A zones and amend the R-2 ordinance to allow for additional housing types	Adopt Zoning Ordinance amendment by December 2025.
Action 3-1i: Amend the Zoning Ordinance to allow for increased residential development on irregular and smaller lots in existing communities, including: reducing the minimum lot size required for residential development in the R-1, R-2, and R-3 zoning districts; increasing lot coverage maximums in the R-1, R-2, and R-3 zoning districts; and allowing for the development of up to 14 dwelling units per acre ministerially in the R-2 zoning district.	Adopt Zoning Ordinance amendment by December 2025.
Action 3-1j Support a variety of housing types in Racially Concentrated Areas of Affluence (RCAAs) through encouraging ADU production and the maintenance of existing units through implementation of the County's rehabilitation program (Program 1-1).	Develop 35 ADUs in RCAAs throughout planning period; target use of rehabilitation funding in RCAA area by June 2026.
Implements the Following Policies	3A, 3B, 3D, 3K, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-2 No Net Loss Zoning

Government Code Section 65863, otherwise known as "No Net Loss" law, prevents the loss of existing housing and land available for future discretionary residential development by ensuring that cities and counties "identify and make available" additional adequate sites if a housing project is approved with fewer units by income category than what is identified in the Housing Element to meet RHNA. In compliance with State law, the County will expand and improve upon the ongoing no net loss efforts to develop a procedure to track:

- Unit count and affordability assumed on parcels included in the Sites Inventory
- Actual number of units achieved and affordability when parcels are developed
- Net change in capacity and summary of remaining capacity in meeting remaining RHNA

Unit count and affordability are identified in the Sites Inventory.

Actions	Objective and Timeframe
Action 3-2a: Monitor inventory sites throughout the planning period to ensure the County remains on track towards satisfying its RHNA target for all income levels.	Monitor development of inventory sites at least annually with submittal of Annual Progress Report every April.
Action 3-2b: Maintain an administrative list of additional sites with appropriate zoning that can be added to the County's Sites Inventory if and when the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County's remaining RHNA, by income level, for the planning period.	Create list by December 2025 and update annually as needed.
Action 3-2c: If development of inventory sites does not occur at densities assumed in the Sites Inventory during the planning period, identify alternative sites from the County's administrative list of additional sites with appropriate zoning.	Rezone sufficient sites within six months of identification of the shortfall.
Action 3-2d: Regularly review Measure E to evaluate its effect on the County's ability to meet its housing needs. As a result of the biennial Measure E evaluation, the County may identify Measure E-impacted lands within a LAFCO-adopted Sphere of Influence or an adopted County Community Plan area for rezoning, and pursue approval from HCD to activate the exemption from County voter approval. An exemption of up to 10 acres per year for residential use may occur when HCD certifies in writing that all of the following circumstances exist: (a) the approval is necessary and required to meet the County's legal fair share housing requirement; and (b) there is no other land in the County or the cities in the County already designated for urban use that can accommodate the County's legal fair share housing requirement. Additional acreage may be designated for residential use if the Board finds, and HCD certifies in writing, that the additional acreage is necessary to meet the Board's legal fair share obligation based on maximum multifamily densities. Any proposal approved under this subsection shall be required to have all housing units permanently affordable to persons or families of very low, low, and moderate income. Any development project consisting entirely of farmworker housing is also exempt from requiring a vote of the electorate and does not include HCD certification.	Review the Sites Inventory annually as part of the Housing Element Annual Progress Report to determine if additional sites are needed. Establish an administrative list of Measure E lands that could be utilized to meet housing needs by March 2025 and update annually as needed. If it is determined that a lack of adequate sites exist, Measure E exemptions may be triggered.
Action 3-2e: The County shall create and maintain a countywide inventory of potential residential infill sites. The inventory will include	To ensure that developers are aware of all potential multi-family residential sites, the

Actions	Objective and Timeframe
vacant and underutilized lots with residential zoning districts and commercial districts that allow residential uses. The County shall make this information available to the public by posting the inventory on the County's website and providing the inventory, upon request, to developers visiting the Planning Department.	inventory will be updated on an annual basis and notice of updates will be distributed to interested developers of record. Permit 250 units on infill properties within the planning period.
Implements the Following Policies	3B, 3C, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-3 Replacement Housing

Pursuant to AB 1397 (Adequate Sites) passed in 2017, the County will amend the Zoning Ordinance to require the replacement of existing residential units on nonvacant RHNA sites as a condition of discretionary project approval for development. Specifically, sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households, shall replace those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall also be consistent with those set forth in the State Density Bonus Law.

Actions	Objective and Timeframe
Action 3-3a: Amend the Zoning Ordinance to establish the replacement requirements pursuant to Government Code Section 65583.2(g)(3)).	Amend Zoning Ordinance by December 2025.
Implements the Following Policies	3C
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-4 Provide Adequate Sites for Lower-Income Households on Nonvacant and Vacant Sites Previously Identified

Housing Element Law (Government Code Section 65583.2(c)) stipulates that inventory sites that were identified in prior housing elements may, in the 6th cycle, only count as available to accommodate the lower-income RHNA if they are rezoned for by-right development and require at least 20 percent of units in proposed projects on those sites be affordable to lower-income households. The County's Site Inventory does not include any sites that were used in previous Housing Element cycles. However, if additional sites must be identified per No Net Loss law (Program 3-2), and those sites were used in prior Housing Elements, the County will amend the zoning ordinance to include these provisions.

Actions	Objective and Timeframe
Action 3-4a: Pursuant to Government Code Section 65583.2 subdivision (c), amend the Zoning Ordinance to establish standards for any sites the County may identify during the planning period that meet the following criteria: ▪ A vacant site for RHNA identified in the previous two Housing Element cycles; or ▪ A nonvacant site for RHNA identified in the previous Housing Element cycle. Standards shall be as follows: ▪ Permit by right housing developments in which at least 20 percent of units as affordable to lower-income households; ▪ Permit the development of at least 16 units per site; and ▪ Ensure sites permit a minimum density of 20 dwelling units per acre.	Amend Zoning Ordinance within six months of identifying sites that meet the criteria.
Implements the Following Policy	3K
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-5 Adaptive Reuse

In recognition of older commercial buildings that may no longer be occupied by the highest and best uses or compatible uses with its surrounding neighborhoods and that the economic impacts of the COVID-19 pandemic may have further accelerated the decline of these properties, the County will pursue opportunities to establish alternative regulations for the conversion of existing buildings to other uses.

Actions	Objective and Timeframe
Action 3-5a: Evaluate, and if appropriate, amend the Zoning Ordinance to remove potential constraints for adaptive reuse, such as review/approval process and minimum parking standards. Promote adaptive reuse to property owners and interested developers through public outreach.	Evaluate the Zoning Ordinance by December 2025 and, if necessary, revise Zoning Ordinance within one year.
Implements the Following Policy	3L
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-6 Zoning for a Variety of Housing Types

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, smaller-scale multifamily housing in existing single-family neighborhoods, manufactured housing, supportive and transitional housing, single-room occupancy units, residential care facilities, and emergency shelters. This program, by allowing a wider range of housing types in all neighborhoods, would also provide for a variety of housing prices, styles, and sizes, which contributes to neighborhood stability by offering more affordable and move-up homes and accommodating a diverse mix of incomes.

Actions	Objective and Timeframe
Action 3-6a: Amend Zoning Ordinance standards to allow for housing options that provide greater flexibility and affordability in the housing stock. This may include allowing shelters, transitional housing, and tiny homes with wraparound services on land owned by faith-based organizations, social services agencies, and nonprofits that do this work in the community and on publicly owned land.	Conduct stakeholder meetings by December 2025 to identify options and, if viable options are identified, amend Zoning Ordinance by December 2026. Connect organizations seeking to develop affordable housing to development resources, such as community development organizations, non-profit developers, and free pre-development meetings. Aim to conduct at least two pre-development meetings for potential projects annually and to facilitate the development of at least 12 units by the end of the planning period.
Action 3-6b: Review all residential zoning districts and land use designations for additional development in low-density neighborhoods. Amend the Zoning Ordinance to allow, by-right or via streamlined review process, a mix of dwelling types and sizes, specifically "missing middle" housing types (e.g., duplexes, detached ADUs, courtyard buildings).	Complete review by December 2025 and amend Zoning Ordinance by December 2026. Aim to facilitate at least 12 missing middle-type units in low-density residential areas per year of the planning period. Focus efforts in lower-density residential areas, High Resource and RCAA areas, (i.e., Salida, East Oakdale, Denair, and Hickman).
Action 3-6c: Amend the Zoning Ordinance to remove the requirement for a conditional use permit for residential care facilities for seven or more persons in all zones that allow residential uses, subject only to provisions for residential uses of the same type in the same zone, regardless of licensing. Establish objective standards for large and small residential care facilities to provide certainty to applicants through the permitting process. Amend the Zoning Ordinance to include a definition that defines residential care homes for six or fewer residents as a residential use.	Amend Zoning Ordinance by December 2025.
Action 3-6d: Amend the Zoning Ordinance to comply with Government Code Section 65661 which requires: ▪ A Low Barrier Navigation Center to be a use by-right in areas zoned for mixed-use and nonresidential zones permitting multifamily uses, provided specific requirements of the law are met; and ▪ Amend the definition of "emergency shelters" to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.	Amend Zoning Ordinance by December 2025.
Action 3-6e: Amend the Zoning Ordinance definitions of "multiple dwellings" and "dwelling groups" for clarity and consistency.	Amend Zoning Ordinance by December 2025.
Action 3-6f: Amend the Zoning Ordinance to define Single-Room Occupancy developments as a permitted residential use in multi-family districts. Establish development standards for SROs that facilitate development.	Amend Zoning Ordinance by December 2025.
Action 3-6g: Amend the Zoning Ordinance to address the requirements of SB 9, including developing objective design standards for qualifying projects.	Amend the Zoning Ordinance by December 2025.

Actions	Objective and Timeframe
Action 3-6h: The County will promote other types of alternative housing options including single-room occupancy developments or conversions, group homes, and permanent supportive housing.	At least once a year, the County will meet with developers and service providers to promote other types of alternative housing with a focus on increasing awareness of housing options and providing technical assistance. Aim to facilitate the permitting of one alternative housing project annually in areas of high cost burden and in existing communities near transportation and services.
Action 3-6i: Amend the Zoning Ordinance to allow for mobile homes in the Historical Site (HS) zoning district, subject to allowable aesthetic and architectural requirements as those required for conventional dwellings.	Amend the Zoning Ordinance by December 2025.
Action 3-6j: Amend the Zoning Ordinance to develop specific parking standards based on unit size in multifamily buildings.	Amend the Zoning Ordinance by December 2025.
Action 3-6k: Assess and amend the County's Zoning Ordinance to permit the development of innovative or unconventional housing types, such as tiny home villages and cottage housing, to expand the County's ability to address the homelessness crisis in the unincorporated areas.	By July 2026, hold a first round of public meetings in communities with higher levels of homelessness (e.g., Empire, Keyes, West Modesto) to solicit input from residents on community-specific needs and preferences for developing innovative or unconventional housing types in their communities. Assess the Zoning Ordinance to identify needed amendments by December 2026. By April 2027, hold a second round of public meetings in the same communities to provide an update on the proposed zoning ordinance changes and seek community feedback prior to their presentation to the Planning Commission. Present a recommendation to amend the County's Zoning Ordinance to the Planning Commission by July 2027, with particular focus in communities with higher levels of homelessness (e.g., Empire and Keyes).
Action 3-6l: Monitor the number of lot splits and units created through implementation of the County's SB 9 ordinance with a goal of approving two lot splits per year.	Monitor lot splits on an ongoing basis. By December 2027, if less than two lot splits per year are achieved, develop technical assistance tools and conduct targeted outreach in higher-income, higher-resource, lower-density neighborhoods (i.e., Racially Concentrated Areas of Affluence) to promote SB 9 lot splits.
Implements the Following Policy	3D, 3E, 3F, 3G, 3N
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-7 Expedited Project Review

The County continues to improve the efficiency of the development review process. As a response to the housing shortage in the State of California, Government Code Section 65920 was amended to restrict local rules that limit housing production. Amendments to Government Code Section 65920 changed the Permit Streamlining Act by creating a more ministerial, rather than discretionary, two-step application process for housing projects. The County will continue to identify efficiencies for the development process in line with Government Code Section 65920. The County will also coordinate with developers to ensure a timely application and development process.

Actions	Objective and Timeframe
Action 3-7a: Continue to offer a free Pre-Application Review process for developers. This review provides developers with a preview of potential issues the proposed development that could result in major costs before they spend money developing plans and submitting an application.	Ongoing on a case-by-case basis.
Action 3-7b: Assess existing processes to identify streamlining opportunities, such as ministerial review for projects that include a percentage of affordable housing units.	Assess existing processes by January 2026 and, if opportunities to streamline are determined feasible, revise the process within one year.
Action 3-7c: Update the County's permit process to comply with AB 2011 which allows for ministerial, by-right approval for affordable housing on commercially zoned land, and also allows such approvals for mixed-income housing along commercial corridors, as long as the projects meet specified affordability, labor, and environmental criteria.	Update the permit process to comply by January 2026.
Action 3-7d: Maintain staffing assigned to the One-Stop-Shop at a capacity level adequate to keep pace with demand and enable more proactive engagement with developers.	Assess staffing capacity with all One-Stop-Shop partners annually.
Action 3-7e: Implement a web-based interactive permit guide that outlines a step-by-step process for residential development including: identifying steps in the entitlement and building permit process, detailed information on development incentives, and funding programs and resources for affordable housing development.	Fully implement use of a web-based interactive permit guide by December 2025.
Action 3-7f: Develop objective design standards for housing development that will help the County meet RHNA obligations, including, but not limited to, multi-family housing, ADUs, SROs, duplexes, and triplexes, while providing a streamlined permitting process.	Adopt objective standards, as necessary, by December 2025.
Action 3-7g: Amend the Zoning Ordinance to address updates to SB 35 and create written procedures for the Streamlined Ministerial Approval Process.	Amend Zoning Ordinance and create written procedures by December 2025.
Action 3-7h: Develop policies and procedures associated with the Housing Crisis Act (SB 330).	Develop and adopt policies and procedures by December 2026.
Implements the Following Policies	3D, 3E,3C, 3Q
Responsible Agency	County Planning & Community Development County Public Works County Department of Environmental Resources County Fire Warden
Funding Sources	Department Revenues

Program 3-8 Accessory Dwelling Units

Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) represent an important opportunity to create more affordable housing for lower and moderate-income households. This program will promote and facilitate the development of ADUs throughout the unincorporated County.

Actions	Objective and Timeframe
Action 3-8a: Conduct a marketing campaign to disseminate existing ADU planning tools, including the County's ADU information website, interactive permit guides, ADU email list, and pre-approved ADU plans.	Advertise the County's ADU planning tools on social media on a biannual basis. Facilitate the development of 184 ADUs over the planning period. Focus outreach efforts in High Resource and Racially Concentrated Areas of Affluence (i.e., Salida, East Oakdale, Denair, and Hickman).
Action 3-8b: Work with organizations, such as community development corporations, to identify gap funding for lower-income homeowners to build ADUs, or to develop or preserve ADUs for income-qualified tenants.	Evaluate the feasibility of using PLHA funds for this purpose by December 2025.
Action 3-8c: Partner with an organization involved in affordable housing or community development activities to provide informational workshops to property owners about the ADU permitting and building process. Target outreach to property owners in Low and Moderate Resource areas and provide workshops and materials appropriate for residents with limited English proficiency.	Facilitate one workshop annually with the objective of facilitating at least 45 ADUs in Low and Moderate Resource areas.
Action 3-8d: Through public-facing materials and outreach activities, promote the development of ADUs in High Resource areas and Racially Concentrated Areas of Affluence, like Salida, East Oakdale, and Hickman.	Facilitate the development of at least 45 ADUs in Higher Resource and higher-income areas.
Action 3-8e: Monitor ADU production on an annual basis to ensure that construction targets are meeting RHNA obligations. Monitor review times for ADU and JADU permit applications and, if necessary, implement process improvements and promote the availability of ADU technical assistance to key community stakeholders (e.g., loan providers). If development is falling short of assumptions, modify development standards, consider reducing fees beyond the requirements of State law.	Promote development of ADUs with a goal of issuing building permits to 184 ADUs during the planning period (or 23 ADUs per year). Review permit processing times for ADUs by January 2027 and implement any needed streamlining actions by January 2028. Monitor production and affordability levels on an annual basis. If the County is trending to miss its target by December 2027, modify and/or develop new incentives to promote ADU development by December 2028, including identifying additional sites or rezoning to accommodate the RHNA.
Action 3-8f: The County will continue to make available pre-approved ADU plans on the County website and will post on the County's website ADU plans provided by the private sector in accordance with State ADU law.	Post all available ADU plans by February 2025 and update as new requests are received.
Action 3-8g: Incentivize the creation and affordability of ADUs by utilizing PLHA and partnering with a local lending institution or Community Development Financial Institution (CDFI) to develop an ADU financing assistance program for Urban County cities. Current PLHA funding allows for a maximum of seven loans between all partner jurisdictions.	Develop new incentives to promote affordable ADU development by December 2028. Aim to assist at least two ADUs in unincorporated Stanislaus County during the planning period and maintain them as affordable to lower-income households.
Implements the Following Policy	3J, 3K

Actions	Objective and Timeframe
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State funding

Program 3-9 Infrastructure

Infrastructure availability is crucial to the development of housing to meet the County's share of the RHNA. This program will facilitate the prioritization and expansion of services for affordable housing projects.

Actions	Objective and Timeframe
Action 3-9a: Transmit notice of Housing Element adoption to all sewer and water providers serving the unincorporated County area.	Send notice of adoption of the Housing Element to service providers within one month of certification.
Action 3-9b: Continue to assess and prioritize the infrastructure needs of underserved communities.	Annually review and update infrastructure prioritization studies.
Action 3-9c: Continue to prioritize the use of the County's portion of HUD entitlement funding for sewer and water infrastructure projects.	Complete the West Modesto sewer project by the end of the planning period. In Fiscal Year 2029/2030, evaluate funding needs as part of the five-year Consolidated Plan update process to identify funding for future sewer and/or water infrastructure projects, particularly in Lower Resource areas, RECAPs, and areas of concentrated poverty, with priority given to areas with failing septic systems. Detail results of the evaluation in the five-year Consolidated Plan.
Action 3-9d: Meet with cities with unincorporated pockets of unincorporated residential development within their LAFCO-adopted Sphere of Influence to assess the feasibility of Tax Increment Financing Districts and Enhanced Infrastructure Financing Districts being used to support housing development.	Meet with the cities and complete an assessment by June 2026 and report results as part of the Annual Progress Report. If determined feasible, draft a strategic plan to implement and utilize Tax Increment Financing mechanisms to facilitate residential growth by December 2031.
Action 3-9e: Implement a fee schedule that assesses fees on single-family and multifamily homes proportional to their impact, pursuant to State law.	Conduct a study to evaluate the infrastructure impact of single-family and multifamily homes and update the fee schedule by June 2026.
Action 3-9f: The County will work with water and sewer providers to monitor that there is sufficient water resources and sewer treatment capacity to meet the projected housing need throughout the planning period.	On a project-by-project basis, maintain an open dialogue with utility districts to discuss and evaluate available resources and strategies to conserve water consumption and expand resources to meet the County's projected housing needs. Annually with the publication of the County's Annual Progress Report, monitor the availability of water to serve future projects on identified sites to accommodate the County's share of the RHNA.

Actions	Objective and Timeframe
Action 3-9g: Continue to seek grant funding to construct infrastructure improvements.	Seek grant funding annually throughout the planning period, beginning in December 2025. Financially assist at least one infrastructure project per year with awarded grant funding, prioritizing projects in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (e.g., Airport, Rouse/Colorado, and Bret Harte).
Action 3-9h: Review policies and guidelines of service providers for compliance with Government Code Section 65589.7 and encourage providers to update policies and procedures to consider low-income and special needs housing developments.	Provide comments to service provider guidelines and procedures by December 2026. If necessary, reach out to service providers to encourage policy updates.
Action 3-9i: Revise the County's infrastructure priority project list as infrastructure projects are completed, prioritizing projects with the greatest health and safety needs.	Review the priority project list for infrastructure improvements after every project completion. In revising the list, give a scoring bonus consideration to Lower Resource areas, RECAPs, and areas of concentrated poverty with infrastructure need that can be met with available funding.
Implements the Following Policies	3O
Responsible Agency	Public Works Department County Planning & Community Development County Executive Office
Funding Sources	State and Federal Funding, Department Revenues

Goal 4: Provide housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, and persons with disabilities.

Policies

4A **Address Special Housing Needs:** The County shall address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, and supportive housing.

4B **Housing and Supportive Services:** The County shall promote housing and supportive services for households with special needs including seniors, persons with disabilities, single parents, and individuals experiencing homelessness.

4C **Reasonable Accommodation:** The County shall continue to implement a reasonable accommodation process for persons with disabilities to request exceptions or modifications of zoning, permit processing, and building regulations to ensure housing is accessible.

4D **Support Stanislaus Community System of Care (the local Continuum of Care):** The County shall support the local Continuum of Care in its efforts to meet the needs of homeless families and individuals.

4E **Support Organizations Serving the Homeless Community:** The County shall support the efforts of non-profit and community organizations that provide emergency shelter and other assistance for the homeless population, including alcohol and drug recovery programs.

4F **Range of Housing for Seniors:** The County shall facilitate and encourage the development of a range of housing types for seniors from which support services are readily accessible.

4G **Family Housing:** The County shall encourage the development of housing that provides for families with children (such as larger rental and ownership units for lower- and moderate-income families) and the provision of services such as childcare and after-school care when feasible.

4H **Universal Design Standards:** The County shall implement universal design standards or guidelines that promote accessibility for everyone regardless of age or physical ability.

Programs

Program 4-1 Housing for Special Needs Populations

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.

The County of Stanislaus is a diverse community with many residents who have special housing needs. State law requires the housing element to address the needs of specific groups with special housing needs, including extremely low-income residents, seniors, persons with disabilities, large families, female-headed households with children, and persons experiencing homelessness. The County will continue to monitor its policies, standards, and regulations to ensure that they comply with applicable laws pertaining to housing for special needs populations.

Actions	Objective and Timeframe
Action 4-1a: Establish a scoring criterion for affordable housing projects that encourage the inclusion of units and services needed to support individuals with special needs.	Amend funding policies to establish criteria that encourage special needs housing by June 2026.
Action 4-1b: Adopt policies and procedures for the integration of universal design features, including those needed for persons with disabilities and their caregivers, in housing rehabilitation and housing development projects, to the extent that funding allows.	Develop guidelines or standards by December 2025.
Action 4-1c: Review the Reasonable Accommodations Ordinance and amend if needed.	Amend Zoning Ordinance by December 2025, if needed.
Action 4-1d: Continue to coordinate the housing efforts of the County's Planning Department, Community Services Agency, and Behavioral Health and Recovery Services to maximize leveraging of existing funding for special needs housing and services, and to build staffing capacity.	Meet regularly with County departments and regional agencies throughout the planning period.
Action 4-1e: Amend Zoning Ordinance to remove references to "nonprofit" in the definition of "family"	Amend Zoning Ordinance by December 2025.
Implements the Following Policies	4A, 4B, 4C
Responsible Agency	County Planning & Community Development Community Services Agency Behavioral Health and Recovery Services
Funding Sources	Department Revenues

Program 4-2 Farmworker Housing

Actions	Objective and Timeframe
Action 4-2a: Continue coordinating with regional partners (County's Agricultural Advisory Board, Stanislaus Regional Housing Authority, agricultural producers, and community-based organizations) to identify changing needs for farmworker housing in the County. Assess current regulations and needs and make changes to the Zoning Ordinance if necessary.	Meet with stakeholders once within six months of Housing Element adoption and present the County's General Plan Update Committee with recommended amendments to the Zoning Ordinance, if any, within six months of the stakeholder meeting.
Action 4-2b: Assist property owners, builders, and non-profit housing developers with securing funding resources, identifying development opportunities, qualifying for density bonuses, and prioritizing infrastructure availability for farmworker housing projects.	Provide technical assistance to facilitate the development of at least 30 units of affordable farmworker housing by December 2031. Annually meet with stakeholders to identify community needs for farmworker housing and identify constraints in the development of farmworker housing.
Action 4-2c: Amend Zoning Ordinance to remove the requirements for a use permit for employee housing and allow ministerial approval for projects with less than 36 beds, in accordance with Health and Safety Code Section 17021.8.	Amend Zoning Ordinance by December 2025.
Action 4-2d: Seek partnerships in providing farmworkers within the community trainings on housing rights to empower them to advocate for better living conditions and address housing concerns.	In partnership with a non-profit or community group serving farmworkers within the community, conduct an annual training on farmworker housing rights.
Action 4-2e: Actively partner with HCD and the UC Davis Western Center for Agricultural Health and Safety on their upcoming California Farmworker Housing Study, which is being conducted to fulfill the requirements of AB 1654 (2022).	Contact Western Center for Agriculture Health and Safety representatives within six months of Housing Element adoption. Once study is complete, work with UC Davis and other community partners to assess the feasibility of program implementation.
Action 4-2f: Coordinate with the Farmworker Advisory Committee (approved by the Board of Supervisors November 12, 2024) to enhance understanding and visibility of housing issues facing the County's farmworker population and to share housing resources, such as fair housing service providers, the County's rehabilitation program, and code enforcement reporting. The committee would provide a forum for sharing information, resources, and gathering feedback on opportunities for improvement.	The establishment of a Farmworker Advisory Committee is a one-year pilot project, with a re-evaluation at the end of the year to assess its effectiveness. Staff will provide information to the committee as needed.
Action 4-2g: Work with agricultural businesses to provide housing resources to their employees.	Conduct outreach to agricultural businesses within the County to disseminate housing resources to farmworker employees by December 2026.
Implements the Following Policies	4A, 4G
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenues

Program 4-3 Homelessness

The County coordinates with cities, regional agencies, service providers, and the Stanislaus Community System of Care (CSOC, the local Continuum of Care), to address homelessness. The County will continue to coordinate with these agencies and service providers to implement the Regional Homeless Strategic Plan, while implementing policy solutions aimed at increasing availability of

emergency shelters, transitional housing, and other housing types for people experiencing and transitioning out of homelessness.

Actions	Objective and Timeframe
Action 4-3a: When shown to be locally effective, promote home-sharing programs to connect homeowners with tenants and create income and housing opportunities for lower-income households, seniors, and persons with disabilities.	Provide information on home-sharing programs on the County's website and ensure service providers are connecting clients with home-sharing programs as appropriate.
Action 4-3b: Continue to support the Stanislaus Community System of Care (CSOC) in its efforts to coordinate with low-income housing producers and advocates, social service providers, representatives of public agencies, and other interested organizations in the implementation of the Regional Homeless Strategic Plan for Stanislaus.	Regularly participate in CSOC meetings and their related sub-committees to assist with providing technical support as needed.
Action 4-3c: Assess the County's capacity to accommodate individuals experiencing homelessness in unincorporated areas by comparing the most recent homeless point-in-time count to the number of shelter beds available countywide on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing. If capacity is not sufficient, amend the Zoning Ordinance as necessary to continue to meet the County's unincorporated area need.	Biennially with release of the Point-In-Time count. If determined to be necessary, adopt Zoning Ordinance amendments within six months of publishing the Point-In-Time Count.
Action 4-3d: Utilize federal and state funds, as available, to support homeless service providers that operate emergency shelters, and transitional, and supportive housing programs for the homeless and those who are at-risk of becoming homeless. Prioritize assistance in Empire, where the majority of homeless individuals in the unincorporated County require resources.	On an annual basis, as part of the funding allocation processes, fund programs for homeless individuals and families and those at risk of becoming homeless, subject to available funding.
Action 4-3e: Amend the Zoning Ordinance to remove the 10 bed per zone limit and increase the size limit for emergency shelters to at least 20 beds per facility, pursuant to State law. Pursuant to AB 139, reduce the off-street parking requirements for emergency shelters to accommodate only sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.	Amend Zoning Ordinance by December 2025.
Action 4-3f: Amend the Zoning Ordinance to establish a process for allowing Permanent Supportive Housing in multifamily development by-right through a staff-level permit.	Amend Zoning Ordinance by December 2025.
Implements the Following Policies	4D, 4E
Responsible Agency	County Planning & Community Development County Community Services Agency County Behavioral Health and Recovery Services
Funding Sources	Federal and State Funding Department Revenue

Program 4-4 Community Outreach and Education

Community outreach is a key component to developing a comprehensive and inclusive housing market in the County. It is critical to engage local community groups and stakeholders from all sectors of the community to educate and provide inclusive housing opportunities and to understand housing needs. The goal of this program is to provide community groups that are affected by restrictions to fair and equitable housing greater opportunities for becoming informed and engaged in the County's housing and overall planning process.

Actions	Objective and Timeframe
Action 4-4a: Work with community groups and service providers to increase accessibility to public workshops by identifying suitable times, preferred meeting types (in person, virtual, or hybrid meetings), having meetings be accessible to persons with disabilities, and having meetings be accessible to nearby transit centers. (Environmental Justice)	Ongoing on a case-by-case basis.
Action 4-4b: Maintain a list of neighborhood groups and other community organizations that advocate for protected housing groups including seniors, individuals with disabilities, large households, multi-generational households, and other groups, and disseminate information about housing opportunities and participate in community meetings as requested.	Develop list by December 2025 and update contact information annually. Disseminate information on an ongoing basis as opportunities become available.
Action 4-4c: Develop a countywide language access policy to ensure residents with limited English proficiency have accessible information. (Environmental Justice)	Implement policy by December 2025.
Action 4-4d: Develop an outreach strategy building upon the Housing Stanislaus initiative for housing programs and community planning activities in an effort to increase participation. Collaborate with existing and new community stakeholders from all sectors and geographic areas to engage in the public participation process. Review the strategy annually to ensure all appropriate populations are reached. (Environmental Justice)	Develop an outreach strategy building upon the Housing Stanislaus initiative by December 2026 and review on an annual basis. Target outreach to communities with negative CalEnviroScreen scores and R/ECAPs. All outreach materials will be distributed in English and Spanish.
Implements the Following Policies	4D
Responsible Agency	County Planning & Community Development Chief Executive Office
Funding Sources	Federal and State Funding Department Revenues

Goal 5: Ensure fair and equal housing opportunities.

Policies

5A **Fair Housing Services:** The County shall support services and programs that work to eliminate housing discrimination and ensure that residents are aware of their rights and responsibilities regarding fair housing.

5B **Housing Discrimination:** The County shall support efforts within its control to prevent discrimination in the sale or rental of housing with regard to race, ethnic background, religion, disability, income, sex, age, and household composition.

5C **Fair Housing Outreach:** The County shall continue to conduct fair housing outreach and education for unincorporated residents, property owners, and housing providers to ensure each understands their rights and responsibilities.

5D **Rental Assistance:** The County shall continue to support rental assistance for lower-income households who have fallen behind on rent and need assistance on regaining or gaining housing stability.

5E **Fair Chance Housing:** The County shall refer individuals with poor credit history, poor landlord referral/references, formerly incarcerated, or other mitigating circumstances to service providers who can assist them with housing opportunities.

Programs

Program 5-1 Affirmatively Furthering Fair Housing & Environmental Justice

AB 686 (2017, Santiago) requires each local government to administer its programs and activities related to housing in a manner that affirmatively furthers fair housing. The County will take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities. Chapter 3, *Affirmatively Furthering Fair Housing (AFFH)*, summarizes the fair housing issues and concerns in Stanislaus County based on findings of the 2020-2025 Stanislaus County Regional Analysis of Impediments to Fair Housing Choice (AI) and additional research conducted as part of this Housing Element update. Programs under this goal are designed to affirmatively reduce barriers to housing and increase equitable conditions across neighborhoods, addressing issues such as historic and existing racial and economic inequities, housing mobility and access, community investment and engagement, and environmental health. The findings of the AFFH analysis were used to develop meaningful actions and metrics and milestones that promote inclusive communities, increase housing opportunities, and address racial/ethnic and economic disparities in the unincorporated County.

Actions	Objectives and Timeframe
Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.	Review policies and procedures for community development and housing assistance programs by December 2026 and make necessary changes within six months.
Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of "Outstanding" and may exclude those with a rating of "Needs to Improve" or "Substantial Noncompliance" according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). Review an individual institution's most recent Home Mortgage Disclosure Act (HMDA) reporting as most recently published by the Federal Financial Institutions Examination Council (FFIEC).	Ongoing, during each funding cycle.

Actions	Objectives and Timeframe
Action 5-1c: Assess the feasibility of allowing a variety of home-based economic opportunities in residential neighborhoods, e.g., micro-kitchens, day cares, and home occupations.	For those actions determined to be feasible, establish a plan to amend County Code by January 2026. Within six months of amendment, promote the opportunities created by amendments in Lower Resource areas, R/ECAPs, and areas of concentrated poverty such as Airport, Rouse/Colorado, and Bret Harte.
Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities.	Seek funding annually as applicable NOFAs become available. If funding is secured, within six months of grant award, issue an RFP for conceptual planning services. Focus efforts in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (i.e., Airport, Rouse/Colorado, and Bret Harte).
Action 5-1e: Modify the County's program guidelines according to funding regulations, if necessary, to allow the use of eligible State and/or federal funding to repair failing septic systems.	Modify funding policies by June 2026.
Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6th cycle Housing Element planning period.	Apply for Prohousing designation by June 2026.
Action 5-1g: Offer training to County staff on a variety of topics included in the County's Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)	Beginning 2026, offer training sessions annually during the planning period.
Action 5-1h: Update the Safety Element to comply with State Environmental Justice requirements and Housing Element Update regulations.	Complete the Safety Element Update by December 2026, and implement programs as specified in the element, reviewing progress annually with the Annual Progress Report.
Action 5-1i: Advertise existing workforce training classes offered through Stanislaus County Workforce Development to provide economic mobility, who partners with the local employment organizations to connect residents with job opportunities and workforce training program opportunities.	Continue to offer workforce development programs through the Stanislaus County Workforce Development and host an annual job fair in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (i.e., Airport, Rouse/Colorado, and Bret Harte).
Action 5-1j: To enhance access in R/ECAP and lower-income areas, the County will continue to promote walkability and active transportation in compliance with the goals outlined in the Circulation Element.	On an ongoing basis, Public Works will continue to apply for grant funding, such as Active Transportation Program (ATP) funding, to improve multi-modal infrastructure, including sidewalks, in Low Resource areas of the County. Collaborate with StanRTA to expand and improve transit routes that connect low-income neighborhoods with employment centers, schools, and other essential services. Aim to complete at least two transit improvement projects detailed in the CIP (see Action 5-3e), including the Bret Harte and Rouse/Colorado sidewalk projects, during the planning period.
Action 5-1k: Support economic development efforts to promote housing mobility through consultation with local economic-focused organizations.	Meet annually with Workforce Development, Opportunity Stanislaus, Chambers of Commerce, and industry groups to engage local employers to identify entry-level positions with good pay that can be advertised to lower-income tenants.

Actions	Objectives and Timeframe
Action 5-1l: Continue to develop the Crows Landing Industrial Business Park to create living wage jobs where people live.	Continue to implement the Crows Landing Business Park Specific Plan. Complete infrastructure improvements included in Phase 1A by the end of the planning period.
Implements the Following Policies	5A, 5B
Responsible Agency	County Planning & Community Development Community Services Agency Chief Executive Office County Behavioral health and Recovery Services
Funding Sources	Federal and State Funding Department Revenues

Program 5-2 Fair Housing Services

The County contracts annually with a fair housing and tenant/landlord services provider as part of its CDBG program. The primary objective of the program is to build awareness of housing laws, tenants' rights, and prevent evictions.

Actions	Objective and Timeframe
Action 5-2a: Coordinate with qualified organizations to provide fair housing and tenant/landlord services, including housing counseling and education and tenant/landlord counseling and mediation. Provide written information and workshops in multiple languages. Ensure outreach to identified Disadvantaged Communities, specifically Cowan Tract, Crows Landing, Grayson, Keyes, Monterey Park Tract, Riverdale Park Tract, and Westley[1]. (Environmental Justice)	Maintain fair housing provider contract and aim to provide at least 90 percent of services in Disadvantaged Communities.
Action 5-2b: Through a fair housing provider, provide information and referral services that direct families and individuals to financial resources for housing rental or purchase, locating suitable housing, and obtaining housing with special needs facilities such as accessible units.	Hold at least eight informational events during the planning period to disseminate informational materials or provide trainings to residents, at least once every two years in communities sensitive to displacement (see Chapter 3, Affirmatively Furthering Fair Housing, Section 3.7.3).
Action 5-2c: Provide training opportunities for property owners and managers about the requirements of federal, state, and local laws related to real estate, housing discrimination, tenant protection, and housing inspection. Work cooperatively with the real estate industry to develop ways for agents and property managers to become more familiar with County housing and rental and utility assistance programs. Encourage realtors to seek fair housing training.	Partnering with a fair housing provider, hold two training sessions annually.
Action 5-2d: Require contracted fair housing provider to conduct random fair housing testing at least annually.	Annual testing.
Action 5-2e: Disseminate fair housing information via targeted social media efforts.	Add more information about fair housing agencies and services on the County's webpage and social media by December 2025.

[1] Stanislaus County Disadvantaged Unincorporated Communities Report. https://www.stancounty.com/planning/pl/documents/gp/i-d-stanislaus-county-disadvantaged-unin-communities-report.pdf

Actions	Objective and Timeframe
Implements the Following Policies	5A, 5B, 5C, 5C
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 5-3 Displacement Prevention, Place-Based Strategies, and Housing Mobility

The County includes actions to address displacement risk, housing mobility, and place-based strategies toward community revitalization. These place-based strategies are intended to address broader community development issues such as parks, neighborhood revitalization, community facilities, and inter-modal transportation.

Actions	Objective and Timeframe
Action 5-3a: Partner with fair housing organizations to ensure dissemination about the California Tenant Protection Act of 2019 (AB 1482). Develop print and online educational materials and make materials available at County facilities and on the County's website including social media.	Make materials available at County facilities and on the County's website by December 2025.
Action 5-3b: Explore opportunities to expand funding to increase capacity of fair housing providers to expand tenant mediation services.	If funding sources are identified and determined feasible, work with fair housing providers to actively seek new funding or reallocate existing funding for expanded services by June 2026.
Action 5-3c: Incorporate near-term infrastructure projects detailed in the South 9th Street Corridor Plan into the County's Capital Improvement Project list. The South 9th Street Corridor Plan is intended to guide public improvements, private development, and economic growth within the corridor and surrounding South 9th Street area and aims to promote safety, enhance connectivity and land use compatibility. Projects are organized into the following categories: roadway and green infrastructure, bicycle and pedestrian facilities, and intersection treatments.	Complete the near-term 9th Street Pavement Rehabilitation project by December 2026. Add other near-term projects to the Capital Improvement Plan project list by 2026. See Appendix G of the Corridor Plan for a complete list of projects[2]. Complete at least two infrastructure projects by 2031.
Action 5-3d: Prioritize the improvement of existing parks and other community spaces by adequately maintaining and improving existing facilities and amenities (lighting, playground equipment, pools, community centers etc.) and provide new amenities where feasible in Disadvantaged Unincorporated Communities, specifically Grayson, Keyes, and Crows Landing. Explore grant funding opportunities for park enhancements. (Environmental Justice)	Apply for and secure grant funding for the enhancement of the Leroy Fitzsimmons Playground in Grayson, including replacement of the playground equipment, adding play surfacing and ADA improvements, by December 2026. Complete the interior and exterior renovation and remodel of the Keyes Community Center and Library by July 2026. Renovate the Bonita Pool in Crows Landing, including restrooms, a concession stand, picnic area, and ADA improvements, by December 2026. Complete at least three park improvement projects by 2031.

[2] South 9th Street Corridor Plan. 2025. https://www.stancounty.com/bos/agenda/2025/20250114/DIS01.pdf

Actions	Objective and Timeframe
Action 5-3e: Partner with StanRTA to improve access to public transit routes that connect low resource residential neighborhoods to jobs and shopping centers as well as to emergency services, such as hospitals and resilience centers (established to shelter persons during extreme weather or other emergency events). Provide StanRTA with community input received on public transit route needs and aid in educating the public on available public transportation services, including fixed routes, flexible services (Dial-A-Ride, shuttle, and medivan services), ADA Paratransit services, and the availability of reduced fares for seniors (age 65 and older), persons with disabilities, and veterans. Partner with StanRTA on seeking funding to address any gaps in access to public transit. (Environmental Justice)	Establish a partnership with StanRTA and provide any community input received to allow StanRTA to update service needs assessment by December 2026. Provide information on available public transit services, and support and work with StanRTA's efforts to secure grant funding by June 2026.
Action 5-3f: Implement placed-based improvements with a focus on upgrading infrastructure in communities with high displacement risk, including the Bret Harte and Riverdale Park Tract (South Modesto), Bystrom (North Ceres), Crows Landing, Empire, Herndon (South Ceres), Kenwood/Starr (Turlock), Robertson Road, Rouse/Colorado, and Spencer/Marshall (West Modesto), and neighborhoods. Specific projects are listed below: **Bret Harte and Riverdale Park Tract (South Modesto):** • Bret Harte Infrastructure Project: Design and construction of storm drain facilities (including curb, gutters), sidewalk (including ADA ramps and misc. driveway approaches), street light facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Fall 2025. • Riverdale Park Tract Infrastructure Project: design and construction of storm drain facilities (including curb, gutters), sidewalk (including ADA ramps and misc. driveway approaches), domestic water facilities, street light facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Summer 2026. **Bystrom (North Ceres):** • Ninth Street Pavement Rehabilitation Project - Tuolumne River Bridge and Pecos Avenue: Design and construct pavement rehabilitation, new bike lane striping, ADA ramps, and traffic signal modifications. Estimated completion date: Spring 2026. • Bystrom Neighborhood Pedestrian Sidewalk Project: Design and construction of storm drain facilities, roadway striping, roadside signs, sidewalk improvements (ADA ramps and miscellaneous driveway approaches). Estimated completion date: 2029. **Crows Landing:** • Bonita Pool: Renovate the Bonita Pool in Crows Landing, including restrooms, concession stand, and ADA improvements, by December 2026. **Empire:** • Empire Storm Drain Trunk Line Project: Design and construction of a storm drain trunk line for the town of Empire to the river. Estimated completion date: 2029. **Herndon (South Ceres):** • Herndon Infrastructure Project: Design and construction of storm drain facilities (including curb, gutters), sidewalk (including ADA ramps and misc. driveway approaches), domestic water facilities, street light facilities, sanitary sewer facilities,	Objectives and timeframes for improvement projects are based on the Capital Improvement Plan for Fiscal Years 2025-2029.

Actions	Objective and Timeframe
roadside signs, and roadway reconstruction (including striping). Estimated completion date: Fall 2025. **Kenwood/Starr (Turlock):** • Kenwood-Starr Infrastructure Project: Design and construction of storm drain facilities (including curbs and gutters), sidewalk (including ADA ramps and misc. driveway approaches), domestic water facilities, street light facilities, sanitary sewer facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Fall 2025. **Robertson Road, Rouse/Colorado, and Spencer/Marshall (West Modesto):** • Robertson Road Elementary Safe Crossing and Active Transportation Project: Install sidewalk along Robertson Road from Carpenter Road to Hays Street. Estimated completion date: Fall 2025. • West Modesto Sewer Infrastructure Projects: Installation of public sewer systems in Spencer/Marshall, Rouse/Colorado, and Beverly/Waverly neighborhoods. Estimated completion date: 2031. • Rouse/Colorado Infrastructure Project: Design and construction of storm drain facilities (including curbs and gutters), sidewalk (including ADA ramps and miscellaneous driveway approaches), domestic water facilities, street light facilities, sanitary sewer facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Summer 2026.	
Action 5-3f: Develop an Affirmative Fair Housing Marketing Plan checklist, which provides parameters on populations to be served by project type, for County-sponsored affordable housing developments located in the unincorporated area that targets multilingual outreach, culturally relevant media, and partnerships with local community organizations, in full compliance with HUD regulations (24 CFR Section 92.351) to ensure equitable access to housing opportunities for groups least likely to apply.	Develop checklist by end of 2026 and amend the plan as needed if additional local findings are made that would affirmatively further fair housing. Require all County-sponsored developments in the unincorporated area to utilize the plan by the County's next Notice of Funding Availability of 2027.
Action 5-3g: Designate a County staff member to act as a small business advocate to serve as a single point of contact for local businesses and interface with relevant departments to support business owners in obtaining permits, grants, and other technical support, with a focus on entrepreneurship in lower-income neighborhoods, such as Airport, Rouse/Colorado, and Bret Harte. Market the program to Municipal Advisory Committees and community-based organizations.	Disseminate outreach materials by the end of 2026. Assist 20 business owners throughout the planning period.
Action 5-3h: Prepare and establish a comprehensive Anti-Displacement Strategy to address pressures of rising housing costs and income inequality in communities with higher displacement risk (i.e., Rouse/Colorado, Bret Harte, and Airport). The anti-displacement strategy will include, but is not limited to the following: • Development of an engagement strategy addressing: ▪ Engagement with fair housing service providers to improve upon and expand the dissemination of information on tenant protection and available fair housing resources. ▪ Engagement with developers to build affordable housing developer capacity, including technical assistance on available sites, funding opportunities, and local fee waiver	Conduct the following schedule of actions: • In 2026, conduct an evaluation of existing renter/tenant protections and anti-displacement measures and fair housing service programs, including funding sources being utilized. Provide the results of the evaluation to the General Plan Update Committee by April, 2027. • In 2026, prepare an engagement strategy for fair housing service providers. Implement the strategy into existing

Actions	Objective and Timeframe
opportunities. ▪ Engagement with communities at a high-risk of displacement (i.e. Rouse/Colorado, Riverdale Park Tract, Bret Harte, Bystrom, Airport, Empire, and Crows Landing) to solicit community input and feedback regarding anti-displacement measures. • An evaluation and feasibility assessment of renter/tenant protections and anti-displacement measures implemented by other similar jurisdictions to prevent displacement in vulnerable communities, including but not limited to: ▪ Rental assistance and foreclosure prevention assistance. ▪ Development of a Tenant and Community Opportunity to Purchase Act program, inclusive of a technical assistance program to help establish and grow tenant associations. ▪ Development of a rental inspection and rental registry program aimed at protecting tenants in R/ECAP areas from evictions. ▪ Development of local preference policies, targeting neighborhoods with a high-risk of displacement • A funding strategy that inventories existing funding sources and potential funding sources that could be utilized to implement strategies.	community development and housing efforts by April 2027. • In 2026, prepare an engagement strategy to build affordable housing developer capacity. Implement the strategy by April 2007. • In 2026, prepare an engagement strategy for communities at high-risk of displacement. Implement the strategy by April 2027. • In 2027, develop program options for the anti-displacement measures targeting R/ECAP areas and present program options, including funding options, to the General Plan Update Committee (GPUC) by April, 2028. • In 2027, based upon feedback from the GPUC and other relevant bodies and stakeholders, establish a comprehensive Anti-Displacement Strategy.
Action 5-3i: Coordinate with South Modesto Business United to work through any business displacement issues associated with the added residential density along Crows Landing Road.	Coordinate with South Modesto Business United on a project-by-project basis and maintain an open dialogue throughout the planning period.
Implements the Following Policies	5A, 5B, 5C, 5E
Responsible Agency	County Planning & Community Development County Department of Public Works County Parks and Recreation County Health Services Agency County Office of Emergency Services County General Services Agency
Funding Sources	Federal and State funding County Public Facility Fees Grant Funding

6.1 Summary of Quantified Objectives

The County's quantified objectives for the 2023-2031 planning period are as follows:

- Sites to facilitate new housing units, including the County's RHNA of 287 extremely low-income units, 287 very low-income units, 398 low-income units, 458 moderate-income units, and 1,045 above moderate-income units
- New development of 100 lower-income units, 100 moderate-income units, and 100 above moderate-income units. This would exceed the County's 5th Cycle development trends.
- Infill development of 84 lower-income units, 83 moderate-income units, and 83 above moderate-income units. This would exceed the County's current 6th Cycle development trends.
- Rehabilitation of 32 affordable units

- Construction of 184 ADUs
- There are currently no at-risk housing units in unincorporated Stanislaus County

Table 6-1 summarizes these objectives for the 2023-2031 planning period by income category.

Table 6-1 Quantified Housing Objectives (2023-2031)

	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
RHNA	287	287	398	458	1,045	2,475
New Development	33	33	34	100	200	400
Infill Development	28	28	28	83	83	250
Units To Be Rehabilitated	10	10	12	0	0	32
ADUs	0	0	0	0	184	184
At-Risk Housing Units to be Preserved	0	0	0	0	0	0

Note: Government Code Section 65583 mandates that localities calculate the subset of the very low-income regional need that constitutes the communities need for extremely low-income housing. As an alternative to calculating the subset, local jurisdictions may assume that 50 percent of the very low-income category is represented by households of extremely low income (less than 30 percent of the median family income).

Appendix A

Summary of Public Participation

Summary of Public Participation

The Housing Element must reflect the values and preferences of the community. Accordingly, community participation is an important component of the development of this Element. Government Code Section 65583(c)(8) states that the local government must make "a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element." This process not only includes community members, but also participation from local agencies and housing groups, community organizations, and housing sponsors.

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

These entities were included in all notifications associated with the Housing Element update, including community events, housing survey, and a participatory mapping exercise. A summary of the public participation is detailed below. Detailed information on the public engagement program is outlined below. Copies of community engagement materials are provided in this appendix.

Public Noticing

To reach the largest and broadest spectrum of community members and stakeholders, Stanislaus County utilized the following notification methods throughout the Housing Element update process:

- Flyers in English and Spanish advertising the project, community workshops, the community survey, and the participatory mapping activity were posted on the County's website.
- Posts to the County's social media accounts, including Facebook and Instagram, advertising the survey and the participatory mapping exercise.
- Email lists of community stakeholders, local governmental departments, and the 6th cycle Housing Element update email subscriber list to provide outreach and regular updates on the project. In addition, the County used Everbridge, the County's mass notification system, to deliver notices to over 1,000 individuals.
- Letters to property owners of sites identified for potential rezoning were distributed with an overview of the Housing Element update process and an invitation to submit feedback.

Community Outreach

Community Workshops

The County held two in-person and virtual community workshops to inform the draft Housing Element in June and October of 2022. The workshops introduced Housing Element and General Plan goals and requirements to the community, educated the community on housing element requirements, and assessed participants' housing needs, priorities, and concerns.

Flyers advertising the workshops were posted on the County's website, and stakeholders were emailed in advance of the workshop series. The flyers provided meeting details (dates, times, locations, zoom links), the Housing Element Update website and email address. Spanish translation services were made available for each workshop upon request. Each workshop consisted of a presentation and opportunities for discussion and input from participants.

A virtual workshop was held on June 23, 2022, via Zoom to discuss the Housing Element Update and related updates. During the workshop, the project team facilitated group discussions on housing, safety, and environmental justice. Participants noted the following housing issues:

- A housing-first approach is needed. Homeless and transitional housing is needed. This is the most immediate need in the county.
- Affordable senior housing is needed. They are a growing part of the population and there are few units.
- Zoning is a barrier. Appropriate zoning capacity is needed to meet the needs of affordable housing projects.
- There is a need for housing for youth coming out of foster care.
- Increases in rental up-front costs have been a constraint to accessing housing. Even when non-profits, such as Aspira Net, can help cover some costs, individuals still struggle to find available units and often don't have families to help secure housing.
- Similarly, housing choice vouchers can be obtained but there are few available housing options.
- The unincorporated area is diverse: urban to rural. There is significant need in urban areas, especially near Modesto. Proximity to transportation and resources should be considered. Outward growth is not in the interest of low-income households.
- Aging and veteran services are needed, including subsidized senior housing. Currently there is a two-four year waiting list for subsidized senior housing. Seniors are a special population. Low-income seniors have little economic mobility and have many needs.
- Attracting developers is tough. More incentives are needed for developers of special needs and senior housing.

An in-person community workshop was held on October 11, 2022 to gather community input on the Sites Inventory selection component of the Housing Element and on issues related to safety and environmental justice. The Ceres Community Center was chosen for its central location to make it easier for residents to attend. During the workshop, participants were encouraged to provide specific input on the potential housing types and locations of new residential development. Additionally, residents were provided information on the Safety Element update, including basic findings from the vulnerability assessment and feedback on hazards and environmental issues in the county. Residents were also informed of the Environmental Justice Element Update, which will include environmental justice policies throughout the different elements of the General Plan.

Following a presentation, attendees participated in five workshop stations:

- **Station 1** provided an overview of the Housing Element Update.
- **Station 2** provided an overview of the proposed site inventory with a mapping exercise for participants to comment on the proposed sites and identify additional potential sites for the inventory and/or rezone effort. An informational handout was provided for participants that showed six areas with proposed zoning changes and three areas without zoning changes. There were also laptops available for participants to conduct the participatory mapping exercise.

- **Stations 3 and 4** provided context for planning efforts related to climate and environmental justice.
- **Station 5** included the Housing Element Update schedule.

Participants expressed the following concerns:

- Traffic conditions that could result from new residential developments.
- Housing access and availability, particularly for rental housing.
- Housing options for college students.

Images of participation at stations are shown in Attachment 3.

Housing Element Presentations

The consultant team and County staff held presentations on the Housing Element Update to the General Plan Update Committee (GPUC) and the Planning Commission. The GPUC is comprised of two Stanislaus County Board Supervisors and two Stanislaus County Planning Commissioners. The presentation to the GPUC, held on July 7, 2022, provided an overview of the Housing Element Update, the regional housing needs allocation (RHNA), State legislation, the Safety Element Update, and the Environmental Justice Element. The presentation to the GPUC, held on September 1, 2022, discussed the Sites Inventory with an overview of proposed rezone sites.

A presentation to the GPUC was held on April 6, 2023, to solicit feedback on proposed policy and programs included in the Housing Element Housing Plan. The GPUC provided input on a variety of proposed housing programs, including the need for improved code enforcement data, inclusionary housing, and incentives for increased housing development such as density bonuses, public facility fee waivers, accessory dwellings. They also noted that more migrant and farmworker housing is needed, as well as more Housing Choice Vouchers, and shelter beds. Additionally, the Committee discussed the possibility of using a Community Development Financial Institution Fund, or an Enhanced Infrastructure Financing District to increase infrastructure and homeownership in the County. The Committee identified Keyes, and possibly parts of Denair for potential agricultural land redevelopment. A fourth presentation was held on August 23, 2023, to present the Draft Housing Element, amended Housing Plan, and changes to the sites inventory. A fifth presentation with the GPUC was held December 5, 2024, to provide an overview of revisions made to the Housing Element in response to HCD comments received November 15, 2024, and to receive input from the committee. In response to GPUC input, the Housing Element was amended to incorporate the following actions:

- Added an action utilizing the Measure E exemption for farmworker housing projects (Program 3-2)
- Amended Measure E action to include 10-acres per year for moderate- and above moderate-income housing; (Program 3-2)
- Added an action to include specific commitments to incentivize the creation and affordability of ADUs (Program 3-8)
- Added an action discussing the Board of Supervisors' newly approved Farmworker Advisory Committee pilot program (Program 4-2)
- Amended existing homeless actions to target the Empire community (Program 4-3)

An overview of the 6th cycle Housing Element Update was provided to the Planning Commission on July 7, 2022.

Additionally, the County met with California Rural Legal Assistance, Inc. (CRLA) on December 6, 2022, to discuss and receive feedback on the identified proposed rezone sites, and distributed letters to property owners of sites identified for potential rezoning with an overview of the Housing Element update process.

Stakeholder Interviews

In September and October 2022, interviews were conducted one-on-one via conference call and Zoom with local housing developers, agencies, and housing and community health advocates to gain an understanding of the housing conditions, issues, and opportunities in Stanislaus County. The interviews were conducted with 11 participants from 10 different organizations:

- Manufacturers Council of the Central Valley
- Center for Human Service
- West Modesto Collaborative
- Building Industry Association of the Greater Valley
- Resident (Grayson), Retired Behavioral Health Specialist
- Catholic Charities of the Diocese of Stockton
- Tuolumne River Trust
- Modesto Municipal Advisory Committee
- California Rural Legal Assistance
- Self Help Enterprises

The list of stakeholders included a range of community interests, including special needs housing providers, economic development advocates, service providers, community representatives, legal aide, and environmental stewards. These stakeholders represent a wide swath of the Stanislaus Community. After the consultants provided a brief project overview, stakeholders were encouraged to provide their thoughts on housing conditions and needs in the county. A summary of feedback is provided below:

Regional Housing Concerns

HOUSING AFFORDABILITY AND AVAILABILITY

- **Outside investment in housing stock contributes to affordability concerns.** Stakeholders expressed that investors and homebuyers from outside the community have contributed to rising housing prices countywide reducing the already limited availability of naturally-occurring affordable housing.
- **Housing to meet workforce demand is limited.** There is concern that there is not enough affordable workforce housing to meet new industry trends. Permanent farmworker housing is needed, and new industrial facilities, such as the Amazon facility opening in Turlock, will require more workforce housing than is currently available. Additionally, the student population of California State University (CSU) Stanislaus is expected to grow, increasing the demand for student housing.
- **Lack of diverse housing types in existing stock.** Most of the housing stock in the unincorporated county consists of single-family homes and mobile home parks. While there are some multifamily projects in the unincorporated county, the county's capacity for these projects is constrained by

lacking sewer and water connections and the cost of additional improvements such as sidewalks, curbs, and gutters. Most new housing development consists of large homes rather than smaller for-sale units, limiting access to the housing market for moderate or lower-income households.

Vulnerable Populations:

- **Predatory home sales target seniors.** Many of the residents in the unincorporated communities have resided in those communities for generations and are now reaching retirement age or are passing homes down to family members. However, older residents are targeted by real estate investors to sell their homes for lower than market rate to increase profits for turnaround sales.

Community Development and Infrastructure

- **Incompatibility with surrounding agricultural land.** Some agricultural uses are being converted to small scale agricultural-industrial uses. Such uses have different needs, including trucking and transportation, that can cause adverse impacts on the surrounding community, such as pollution burden.
- **Lack of infrastructure and services to support affordable housing in rural areas.** Most development has occurred in or near the incorporated cities in Stanislaus County due to the availability of public facilities, services, and employment opportunities. Affordable housing is not feasible in rural areas without available utility connections, transportation, and employment.
- **Lack of investment in rural communities**. Stakeholders expressed that some lower income, rural communities have lacked the level of investment seen in incorporated cities and wealthier neighborhoods in the county. Stakeholders stated that, in some cases, communities with higher percentages of people of color have received priority for infrastructure investment or consideration for annexation. Stakeholders express a desire for attention to be given to each community, how it is developed, and if the commercial and residential uses are compatible.
- **Lack of effective code enforcement**. Stakeholders report that there is a lack of effective code enforcement in the unincorporated county. Complaints related to code compliance (i.e., illegal dumping, land use infractions, squatters, environmental issues) may be initially investigated and cited, but little follow-up is done to ensure compliance has been reached. This is reported to be caused by limited County staff capacity and a lack of effective enforcement mechanisms.

Community Engagement and Services

- **Lack of community outreach**. Stakeholders felt that additional effort is needed to help inform and educate community members in the unincorporated areas on housing rights and housing assistance opportunities. Informational and financial resource information is scattered and hard to navigate. Stakeholders report that a central information hub would be highly valued.
- **Language Barriers.** Many households in the unincorporated areas of the county need materials translated to Spanish and online outreach in Spanish to be informed on housing issues and opportunities. Stakeholders expressed the importance of translation services in getting community members to participate.
- **Lack of transportation options**. Although there is bus service in the unincorporated county it is not dependable and does not have enough stops throughout communities to make it a reasonable alternative to cars. A lack of transportation options makes it difficult for people, especially seniors and people with disabilities, to get to work, school, local stores and markets, and community services.

- **Lack of services.** Some unincorporated areas of the county lack sufficient services such as afterschool programs, grocery stores, and banks.

Housing Needs

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

resell it at a high price. Individuals residing in mobile home parks currently have few protections and need support and assistance (i.e., rent stabilization) to prevent homelessness.

- **Need for additional housing sites.** Stakeholders commented on the importance of identifying feasible sites for multifamily housing development that have access to utilities and sufficient allowed density. Sites without sufficient zoning (at least 20 dwelling unit per acre) and nearby utility connections are simply infeasible for affordable development and are not considered by developers. Additionally, it is important that sites identified for low-income housing are not concentrated in areas that already have a disproportionate share of low-income housing as this may exacerbate existing issues (communities identified by name include South Modesto and Crows Landing). Stakeholders expressed the need for more transparency in the site selection and evaluation process and expressed an interest in seeing data related to previously used sites, sites with by-right zoning, and site-specific income assumptions.

Constraints

INFRASTRUCTURE

- **Lack of Infrastructure**. Many areas within unincorporated Stanislaus County lack connections to utility lines such as water and sewer. Most sites in rural communities do not have sufficient utility and transportation connections to support large multifamily developments. Connecting new utility lines is expensive, pricing out residents and disincentivizing developers from building in the unincorporated county. Many of the new infrastructure connections are to incorporated cities, and often requiring both upfront and recurring costs.

FINANCIAL AND ECONOMIC CHALLENGES

- **Cost of Development.** Land and construction costs have increased in recent years making it infeasible to build affordable housing units without government subsidies. Additionally, interest rates have increased in the last year, making it difficult and expensive to secure financing for development.
- **Cost of Entry.** There is a high cost of entry into the housing market. In many cases a household may be able to afford monthly rent or mortgage, but cannot meet the initial requirements for down payment, first and last month's rent, minimum credit score, or extensive rental history. The cost of entry is especially difficult for people on a fixed income, students, and undocumented individuals.

DEVELOPMENT REGULATIONS

- **Development Fees** Stakeholders expressed that fees associated with residential development disincentivize developers from building affordable housing. In Stanislaus County there is a farmland mitigation program that requires developers to pay for agricultural easements or pay an in-lieu fee to aid the loss of farmland. Unlike other development fees, developers have expressed that these fees are expensive and provide little benefit to the developer or tenants.
- **Zoning.** Stakeholders expressed that sites for lower-income capacity need to be zoned sufficiently to meet housing needs. Affordable housing developers expressed an interest in minimum density of 20-25 du/acre to be competitive for funding programs. Additionally, discretionary review processes are perceived as a constraint, and stakeholders expressed that by-right zoning for residential areas is key in attracting developers, especially for affordable housing.

- **Environmental Requirements for Industry.** Stakeholders report that State environmental regulations and requirements constrain industrial uses in the county, and that these constraints have led to companies leaving California altogether. This is especially true for the types of industry in Stanislaus County such as glass manufacturing, packaging, and molded plastics.
- **Subdivision Improvement Requirements.** County staff reached out to local developers to gather input on whether subdivision improvement requirements constrained residential development. In response, developers concluded that, while there are other potential constraints to housing development in unincorporated Stanislaus County that add uncertainty and extra cost to the development process (e.g., lack of existing infrastructure), subdivision standards do not necessarily pose an undue constraint on development. The County's subdivision regulations for site improvements are similar to other jurisdictions, and do not present a constraint to the development of housing.

HOUSING ASSISTANCE SYSTEM

- **Coordinated Entry System.** The Coordinated Entry System (CES) was developed by the Stanislaus Community System of Care to coordinate the intake, assessment, and referral process within the HUD Continuum of Care (CoC) and Emergency Solutions Grants (ESG) program. The intent of CES is to act as a centralized database to connect people in need of housing assistance with housing providers (i.e., subsidies, vouchers, housing units, support services). Currently, to be eligible for CoC or ESG funded housing programs, individuals must be in the CES that assesses vulnerability, where the most vulnerable will be housed first. Some stakeholders felt this system is flawed and not always equitable. Additionally, due to long waitlists, it is difficult to get in touch with applicants when units become available because contact information changes frequently and some have moved.

Housing Opportunities

- **Accessory Dwelling Units (ADUs).** Stakeholders expressed that there is potential for ADUs as an affordable housing option and that county residents would be interested in both building ADUs and living in them. However, more information, education, and financial assistance is needed for homeowners to better understand the regulations, assistance programs, and costs involved in the construction of an ADU on their property.
- **Grant Funding.** There are grant funding opportunities for affordable and supportive housing, but developers, nonprofits, and government agencies need to work in collaboration to be informed of these opportunities and be more competitive to receive funding and implement programs. Several non-profit developers expressed interest in partnering with the County in pursuit of funding for affordable housing projects.
- **Programs for Prospective Homeowners.** Due to the gap in income and cost of living for most residents in the county, there is a need for programs that offer financial assistance to potential homebuyers. Potential programs might include a sweat equity homeownership program (in partnership with Self Help Enterprises), down payment assistance, or a mortgage credit certificate program.
- **Wrap Around Services.** There is a need for accessible wrap around services (i.e., education on budgeting, banking, housing rights, basic skills) on-site in housing developments with lower-income and special needs residents, particularly in emergency and transitional housing. Non-profit developers, such as Self-Help Enterprises, often contract for these services with local

agencies to provide resources and case management to residents. Programs that provide access to resources, such as a shared car, are highly valued by residents.

- **Partnerships.** Stakeholders encouraged the County to pursue partnerships with local developers, nonprofits, regional agencies, both in the pursuit of grant funding and in providing education and outreach on housing issues and resources to the community.
- **Affordable By Design.** One stakeholder suggested that, rather than implement an inclusionary ordinance, the County should consider requiring that a percentage of units in multifamily projects are designed as smaller units that are more affordable by design.
- **Alternative Housing Options.** There are opportunities for alternative affordable housing options in Stanislaus County such as tiny home villages, rapid rehousing, multigenerational housing, or small unit sizes.
- **Proactive Rental Inspections.** Some stakeholders suggested that a proactive rental inspection program would help mitigate some of the substandard housing issues seen in the county. The program could be a County led effort, or partnership with local agencies, that keeps a registry of rental properties and performs random inspections to ensure rental units are up to code. This would alleviate some of the pressure from tenants to report substandard housing issues.
- **Community Education and Outreach.** Many stakeholders felt there was an opportunity for there to be greater collaboration between the County and nonprofit organizations to provide better community education resources about homeowner/tenant's rights, housing assistance, and community services. Many organizations have already compiled this information; however, it is difficult for people to know where to go for information about services and is rarely provided in multiple languages (Spanish, Hmong, Arabic). Some stakeholders also expressed that it would be beneficial to have a one stop shop to connect people to agencies and programs.
- **Anti-displacement Efforts.** Some stakeholders mentioned occurrences of residential areas being redeveloped into commercial uses without replacing the residential units elsewhere, leading to the displacement of existing residents and a reduction in the county's housing stock. There is an opportunity for the County to implement a program/policy that mitigates the impact that conversion to nonresidential uses may have on communities.
- **Program/Policy Accountability.** Some stakeholders expressed that although the County has developed aspirational housing policies and programs in previous housing elements, programs typically lack accountability, objectives, and specific timelines, or are never implemented. This leads to many residents feeling they do not experience the benefits of the County's housing action plan. Developing policies and implementation measures that have more detailed goals, timelines, and roles of responsible parties can create more effective and transparent expectations for housing policy implementation.
- **HCD Pro-housing Designation.** The California Department of Housing and Community Development (HCD) launched the Pro-Housing Designation Program that provides additional points in the scoring of grant funding applications. Some stakeholders encouraged the County to pursue Pro-housing Designation to improve competitive funding applications.

Targeted Stakeholder Interviews

After the public draft Housing Element was released, the County conducted several one-on-one interviews with stakeholders representing the interests of special needs populations. The interviews included local housing and community health advocates, farmworker housing advocates, and affordable housing consultants to gain an understanding of the housing conditions, issues, and

opportunities in Stanislaus County. The interviews included nine participants from five organizations:

AGENCY WITH EXPERTISE IN EMERGENCY SHELTER FUNDING, DEVELOPMENT, AND SUPPORT

- Ash Ortiz, Thurmond Consulting
- Amy Wyatt, Thurmond Consulting
- Scott Thurmond, Thurmond Consulting

AGENCIES SUPPORTING FARMWORKERS

- Anna Genasci, Stanislaus County Farm Bureau
- Tom Orvis, Stanislaus County Farm Bureau
- Jorge De Nava, Central Valley Opportunity Center (CVOC)
- Miriam Giebeler, Stanislaus Regional Housing Authority (Migrant Farmworker Program)

AGENCY SUPPORTING PERSONS WITH A DISABILITY

- Jennifer Stone, Valley Mountain Regional Center (VMRC)

Each interview lasted approximately 45 minutes and was conducted via conference call or Zoom. After the consultants provided a brief project overview, stakeholders were encouraged to provide their thoughts on housing conditions and needs in the county. Although a broad range of opinions and ideas were expressed during the interviews, comments can be generally summarized into the following three categories:

1. Issues
2. Needs
3. Opportunities

For each category, this document summarizes common themes that emerged during the interviews. Please note that the opinions expressed in this summary are those of the stakeholders and do not necessarily reflect the opinions of the County of Stanislaus, County staff, or the consultants. All comments are paraphrased and presented without attribution.

ISSUES

- **Cost of Rent.** The cost of rent is high countywide. Many households are overcrowded due to the high cost of rental housing. Households on a fixed-income struggle to find accessible housing. SSI funds alone are typically insufficient.
- **Wait List for Vouchers.** There is a long wait list (just under 12,000 households) to obtain a Housing Choice Voucher in the county. Many households don't have access.
- **Lack of Local Affordable Developers.** There are very few affordable housing developers in the county.
- **Lack of Affordable Housing Types.** Developers are reluctant to build types other than single-family homes. This is due to high costs of development, generally, as well as comfortability with traditional housing types.

- **High Costs.** The high costs of land and development are a disincentivize to affordable housing development. Developers tend to create single family homes at market rate due to potential for profit.
- **Insufficient Grant Funding.** Although state and federal grants provide critical funding, it is insufficient to meet the need for emergency shelters and housing for persons experiencing homelessness. This is compounded by the high cost of land and development.
- **Inflexible Grant Implementation.** Proposition 1 will provide new funding for housing for persons experiencing homelessness that have a mental health disorder. Eligibility, however, is conditioned to exclude those with a disorder related to substance abuse. These types of qualifiers are difficult to implement and are a constraint to providing housing. Flexibility is needed to provide housing quickly.
- **Reduced Work Hours for Farmworkers.** Changes to State regulations recently changed the agricultural workday from 10 hours a day and 60 hours a week, to eight hours a day and 40 hours a week. Compounded by recent inflation, this reduction in work hours is reported to have led to a 30 percent reduction in income for farmworker households in the last few years.
- **Lack of Services in Rural Areas.** Households with special needs, such as farmworkers, seniors, and persons with a disability, are generally concentrated in less expensive areas within or just outside cities. Although rural areas of the county are more affordable, they lack the services and transportation options that benefit these households. People want to live in areas with opportunities to work, shop, and play.
- **Lack of Capacity in High Resource Areas.** There are not a lot of housing opportunities for lower- and moderate-income households, as well as those with special housing needs. This is particularly true of higher resource areas.
- **Substandard Housing.** Many privately-owned rental units affordable to farmworkers and their families are substandard and in need of renovations.

NEEDS

- **Engagement with the County.** Stakeholders expressed a need for consistent engagement with the County. The Farm Bureau, CVOC, and VMRC each expressed that they feel that annual engagement (at minimum) with their staff is needed to fully discuss opportunities for partnerships in support of housing and services.
- **Integrated Services.** Households with special needs benefit greatly when services and amenities are integrated into the development. Several stakeholders mentioned that community rooms are an asset as they provide a space for classes and informational events. Emergency shelters that function as a campus with integrated services are effective and efficient, reducing the costs of providing services.
- **Variety of Housing Types.** While converting hotels to SRO or studio housing units has been a successful tool for developing affordable units in recent years, the units are very small and not appropriate for multiple people long-term. There is a need for a variety of affordable housing types, including those for families, multi-generational households, and seniors and persons with a disability living with a caregiver.
- **Farmworker Units.** In Stanislaus County, farmworkers tend to stay in the county year-round, rather than migrate to opportunities in the wider region. Although the Housing Authority manages several farmworker housing facilities, there is a need for additional units affordable to farmworkers and their families year-round.

- **Large Units.** There is a need for large units that can support multi-generational households.
- **Privacy Concerns.** Local farmworkers are often hesitant to speak with County representatives. Engagement often needs to be facilitated through a known agency or community contact. Each of the agencies supporting farmworkers expressed interest in facilitating engagement between their clients and the County to work to overcome these concerns.
- **Up-skilling Opportunities and Economic Mobility.** Farmworkers benefit greatly from educational opportunities such as skills classes that can lead to higher paid agricultural jobs or new career opportunities. Agencies currently providing such educational opportunities are in need of support as well as facilities to hold classes and trainings.
- **Childcare.** There is a great need for childcare for lower income and farmworker households.
- **Support for Caregivers.** Stakeholders reported that a majority of persons with a disability countywide live with family or a caregiver. The County is encouraged to support these households through programming that addresses the unique needs of these households.

OPPORTUNITIES

- **Allow for a Variety of Housing Types**. To support the housing needs of all individuals in the community, the County is encouraged to allow for a variety of housing and development types, including micro units, tiny homes and villages, duplexes, triplexes, and fourplexes, supportive housing, and large units with four or more bedrooms, in a variety of zones.
- **Development on Oddly Shaped Parcels.** The Housing Authority has had success developing affordable units by using prefabricated construction on small oddly shaped parcels that come at a lower cost. The County is encouraged to continue to support development in this manner.
- **Sites for Emergency Shelters.** The County is encouraged to ensure that sufficient and appropriate sites are available for the development of emergency shelters. The County could engage local agencies to identify the most desirable sites and ensure that emergency shelters are allowed by-right on these sites without requiring an applicant to apply for a General Plan or Zoning Code Amendment. The County could engage potential applicants to assist in the application and entitlement process.
- **Sites for Lower Income Households.** The County could engage local developers to discuss the potential of available sites throughout the planning period.
- **Modular Development.** One stakeholder mentioned that modular development types can reduce the cost of development by more than 10 percent.
- **Grant Funding For Emergency Shelters.** The County is encouraged to work with grant writing specialists to identify additional funding opportunities in support of emergency shelters. The County is encouraged to engage agencies to discuss potential opportunities annually.
- **Project-based Partnerships.** Project-based grant funding applications are more successful when there is buy-in from a local jurisdiction. There is an opportunity for the County to create partnerships with local agencies and affordable housing developers in support of grant funding applications.
- **Fees.** Stakeholders indicated that fee waivers can provide real cost reductions.
- **Affordable Housing Summits**. In addition to regular engagement with developers and non-profit agencies, the County could host a summit where local and regional developers and agencies could interact, share ideas, and discuss opportunities in a single forum.

- **Continuum of Services.** Stakeholders communicated that the Department of Health Care Services has funding that can help create a continuum of services around housing. The County is encouraged to investigate this opportunity.
- **Quality of Life Programming.** Programs that benefit children and families have a huge impact on quality-of-life for farmworkers and their families, as well as those with special housing needs. The County is encouraged to support and facilitate targeted programming in multiple languages, particularly where these households live. The County is encouraged to support/continue to support brown bag programs, health fairs, before/after school programs, and ESL training as part of a holistic housing strategy.
- **Direct Engagement.** The County is encouraged to engage households with special needs directly to better understand the needs of the community and to increase participation in programming and services. The County could work with local agencies to facilitate such engagement.
- **Weatherization and Renovations.** The County is encouraged to support/continue to support programs providing weatherization and home renovations that work to decrease the cost of utilities for farmworkers and lower income households.
- **Provide Meeting Spaces for Programming.** Local agencies providing workforce training, life-skills classes, and other educational programming are regularly in need of meeting spaces. The County could provide meeting rooms and event spaces for events and trainings. Additionally, CVOC's truck driving school is in need of additional space for training. There may be a potential for the County to identify and make available surplus parking lots or public land to the CVOC.
- **Transportation.** Local agencies supporting farmworkers and persons with a disability are currently providing transportation for their clients to jobs sites, medical appointments, and critical local services. The County could partner with these agencies to identify transportation needs and create an action plan that works to increase transportation options for households with special housing needs.

The Housing Plan was updated to incorporate this feedback into the program actions. Programs 5-1 and 3-1 were added to address the comments regarding opportunities for economic mobility and facilitating development on oddly shaped parcels. Comments regarding inflexible grant implementation, reduced work hours for farmworkers, and modular development were not incorporated as they are outside the County's jurisdiction to address. In resposnse to farmworker housing needs, Program 3-2 was amended to state that Measure E requirements are exempt for projects consisting entirely of farmworker housing. Additionally, Program 4-2 was amended to further support farmworker housing through partnerships with HCD and the UC Davis Western Center for Agricultural Health and Safety, housing rehabilitation, and outreach efforts. Program 4-2 was further amended to coordinate with the Farmworker Advisory Committee one-year pilot program that was approved by the Board of Supervisors in November 2024. Language was added throughout the Housing Plan to address the remaining comments.

Public Comment Survey

The County conducted a community housing needs survey from August 2 to August 15, 2022, to inform the Housing Element update. A variety of outreach efforts were conducted to encourage survey participation including posting on the project website, email blasts to stakeholders and interested parties, and social media posts on Instagram and Facebook. The survey consisted of 16 questions and used different formats for questions: checkbox, ranking, and open-ended questions. The survey was made available in both English and Spanish.

In addition to an online survey, the survey was made available in print form during various community outreach events. A total of 148 people responded to the survey: 117 in English and 31 in Spanish. Approximately 40 percent of survey respondents had a household income of less than $50,000. The following themes were identified from the community survey:

- The highest priority housing need is lower-priced rentals and homes.
- The top three housing-related needs for the next ten years are "housing that is affordable for all," "more opportunities for home ownership," and "more rental housing."
- A desire for co-housing (housing with an emphasis on community living, i.e.: shared open spaces, or kitchens).
- The most urgent housing issue in the county is affordability of housing.
- Areas near public transit stops, employment, and shopping centers were selected as the most suitable for new housing development.
- The two most-needed fair housing services in their communities are landlord/tenant counseling and education/information on tenant rights.
- Respondents identified down payment assistance for lower-income first time homebuyers and home repair assistance for low-income homeowners as the most needed housing assistance services.

Participatory Map Activity

Participatory mapping exercises are a type of survey that allows participants to view, comment, and prioritize specific topics related to the housing element. The participatory mapping exercise allowed participants to identify and rank potential housing opportunity sites. Input gathered through this activity informed the County's site selection process.

The participatory mapping exercise involved a Geographic Information System (GIS)- based survey that was available from October 11 to November 1, 2022, on the project website. Notice of the survey was sent out via email lists to interested parties and was advertised on the County's social media and website. The survey garnered 177 total responses, 27 of which were general comments and feedback on the sites inventory. The remaining 150 responses were made regarding 98 of the identified sites included in the site inventory. Survey input resulted in the following themes:

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

Project Website

A project website dedicated to the Housing Element update was created to provide information and solicit feedback. That site can be found here: https://www.stancounty.com/planning/pl/general-plan.shtm. The project website included background information on the Housing Element, information on upcoming events and engagement opportunities, answers to frequently asked questions, links to upcoming and past event materials, and links to articles and videos on the general plan topics. Project materials were regularly posted on the project website, including documents available for public review, information for upcoming events, and virtual workshop PowerPoint

presentations and video recordings. There was also a sign-up form to receive project email updates and a comment function.

Housing Stanislaus Initiative

Housing Stanislaus is a countywide initiative to develop a unified and actionable vision and strategy framework for housing in Stanislaus County. County staff, along with Valley Vision, a non-profit civic leadership consulting firm, developed an outreach and community engagement strategy that aimed to establish a shared understanding of the needs, challenges, and opportunities for housing, and identify and prioritize projects and programs for housing development. Valley Vision conducted surveys and meetings between December 2021 and July 2022 with the incorporated cities and a wide range of local stakeholders, subject matter experts and industry professionals. This included interviews with key informants. Table A-1 includes a list of individuals and organizations that were interviewed as part of the engagement process.

Table A-1 Housing Stanislaus Key Informant Interviews

Interest Area	Name	Organizational Affiliation
CA Dept of Housing and Community Development (HCD)	Paul McDougall	HCD
	Dulce Ochoa	
	Marissa Prasse	
	Hillary Prassad	
City Managers	Merry Mayhew	Hughson
	Sean Scully	City of Riverbank
	Bryan Whitemyer	City of Oakdale
	Alex Terrazas	City of Ceres
	Ken Irwin	City of Patterson
	Joseph Lopez	City of Modesto
	Michael Holland	City of Newman
	Michael Pitcock	City of Waterford
County Executive	Jody Hayes	Stanislaus County
City council Members	Chris Ricci	City of Modesto
	Sue Zwalen (Mayor)	City of Modesto
	Luis Uribe	City of Riverbank
	Elizabeth Talbott	City of Waterford
City & County Planning, Community Development, Building, Public Works Staff	Angela Freitas	Stanislaus County
	Kristin Doud	Stanislaus County
	Emily Basnight	Stanislaus County
	Kyle De Jesus	Stanislaus County
	Frederic Clark	Stanislaus County
	Miguel Diaz	Stanislaus County
	Steve Mitchell	City of Modesto
	Oscar Diaz	City of Modesto
	Edgar Garcia	City of Modesto
	Jim Alves	City of Modesto
	Rachel Wyse	City of Hughson
	Carla Jauregui	City of Hughson
	Katie Quintero	City of Turlock
	Kim Hammack	City of Turlock

Interest Area	Name	Organizational Affiliation
	Maria Ramos	City of Turlock
	Justin Hendrix	City of Newman
	James Michaels	City of Ceres
	Samir Royal	City of Ceres
	Kevin Waugh	City of Ceres
	Jeff Gravel	City of Oakdale
	Donna Kenny	City of Riverbank
	David James	City of Patterson
	Joel Andrews	City of Patterson
	Teresa Rodriguez	City of Patterson
Stanislaus Regional Housing Authority	Barbara Kauss Jim Kruse	Stanislaus Regional Housing Authority
Special Population Interests	Jill Erickson	Area Agency on Aging
	David Jones	First 5 Stanislaus
	Heather Santos	Disability Resource Agency for Independent Living
	Yasmin Martinez	
	Aaron Anguiano	United Farm Workers
	Edgar Garibay	Latino Community Roundtable
		Tuolumne River Trust

Valley Vision also conducted 12 focus group interviews centered around key interest areas and stakeholder groups. Table A-2 includes a list of participants by focus group interest area.

Table A-2 Housing Stanislaus Focus Groups

Interest Area	Name	Organizational Affiliation
Public works, infrastructure and utilities representatives	David Leamon	Stanislaus County Public Works
	Bill Sandhu	Modesto Public Works
	Michelle Reimers	Turlock Irrigation District
Building Industry Association	John Beckman	BIA of the Greater Valley
For Profit Builders/ Developers/ Architects/ Engineers/ Planners	Anthony Cannella	Northstar Engineering
	Ryan Gerding	Raymus Homes
	James Brenda	JKB Homes
	Scott Hicks	Residential Designer
	Mike Navarro	Navarro Architecture and Design
Non-Profit Builders/ Developers	Welton Jordan	EAH Housing
	Betsy McGovern-Garcia	Self-Help Enterprises
	Steve Madison	STANCO
Financers	Kimberly Ryan	F&M Bank
	Jennifer Seeger	CA Housing and Community Development
	Joe Duran	
		Stanislaus Equity Partners
Housing Advocates	John Mataka	Community
	Perfecto Munoz	Community
	Marisal Aguiar	California Rural Legal Assistance
	Maeve Elise Brown	HERA

Interest Area	Name	Organizational Affiliation
Realtors	Chad Costa Kevin Bens Jeff Diehl Rick Jones	Re-MAX (Modesto Office) Keller Williams (Oakdale Office) Diehl Real Estate Touchdown Properties
Employers and Business	Anthony Ratto Dave White Maryn Pitt	Ratto Brothers Opportunity Stanislaus Manufacturers Council of the Central Valley
Latino Interests	Eric Alvarez Emmanuel Escamilla Nancy Martinez Jose Borroel	Debrief Team
Seniors	Jill Erickson John Dinan	Area Agency on Aging
Nature conservancy	Edgar Garibay	Tuolumne River Trust
CBOs	Cindy Duenas	Center for Human Services

Outreach for Housing Stanislaus informed the Housing Element update involved input from 76 housing stakeholders including housing developers, engineers and architects, planners, community developers, building and public works staff, public housing advocates, financers/funders, real estate professionals, property managers, employers, and community-based organizations. Five overarching themes emerged through these conversations included:

- Vocal community opposition to housing projects
- Regulations and procedures
- Limited land options stemming from lack of infrastructure and agricultural land conservation policies
- Market conditions and impact on development costs and return on investment
- Overburdened staff

This feedback was incorporated into policies and programs. Specifically, the recommendations developed through Housing Stanislaus included increasing capacity in public agencies (Program 2.6); refinement of policies and procedures (Programs 3.4, 3.6, and 3.7), access to capital (Program 2.1), upgrades to infrastructure (Program 3.9), engage property owners and developers (Program 3.1), and foster a variety of housing types (Program 3.6).

Popup Community Events

The County gave presentations on the Housing Element at several community events during April and May, 2025. Table A-2 includes a list of events, dates, and the geographic areas represented.

Table A-3 Community Outreach Popup Events

Community Event	Date and Time	Geographic Area
South Modesto Business United	April 23, 6-8pm (virtual)	Crows Landing Road
Free Farmers Market at the Airport Neighborhood Community Center	April 24, 10-11am	Airport Neighborhood
Dia del Nino Health and Resource Fair at the Grayson Community Center	May 2, 3:30-6:30pm	Westside of County (Grayson, Westley, Crows Landing)
Parklawn United Neighbors Meeting	May 7, 6:30-8:30pm	Parklawn Neighborhood (South Modesto)
Rouse/Colorado Community Meeting	May 7, 6-8pm	Rouse/Colorado Neighborhood (West Modesto)
South Modesto Municipal Advisory Council (MAC)	May 8, 6-7pm	South Modesto Neighborhood
West Modesto Community Collaborative Builders Group	May 14, 11-12:30pm	West Modesto Neighborhood

The community feedback received during these presentations is summarized as follows:

Infrastructure & Public Works

- Community members commented on road conditions, including intersections that needed improvements and roadways with speeding issues.
- Community members expressed concerns about nuisances, including dust, noise, vibrations, road closures, and truck traffic, caused by infrastructure improvements being conducted in their neighborhoods (including the installation of sidewalks and sewer lines.
- Community members asked whether sidewalk installation would increase their property taxes and why sidewalks are only being installed in certain areas.
- Community members requested that alleys be closed due to ongoing issues with illegal dumping, trash fires, and homeless encampments.
- Community members inquired about the status of grant funding for infrastructure and whether it had been received.

Housing & Land Use

- Community member identified a need for more affordable housing, especially for persons with disabilities and people experiencing homelessness.
- Some community members expressed support for higher-density housing to accommodate homeless individuals, while others expressed concerns that it could lead to deteriorating neighborhood conditions.
- Community members asked about the rules and funding for constructing ADUs, including converting existing structures.
- Community members requested clarification on which parcels would be rezoned in the Bystrom Neighborhood (South Modesto).
- Questions were asked about property setbacks from the street and sidewalks.

Costs, Fees & Assistance

- Some community members stated that rent is too high and increases unpredictably, often without sufficient notice.
- Business owners on Crows Landing Road asked whether they would receive exemptions from Public Facility Fees or assistance with infrastructure costs if they are ready to build.
- Community members asked about the monthly cost of sewer services through Modesto and whether they would be forced to connect to the sewer system.
- There were questions about funding assistance for home repairs, new home construction, and ADU development.

Tenant & Landlord Issues

- Residents reported that landlords often neglect repairs and retaliate against tenants who report issues by raising rent or initiating evictions.
- Opinions on rent stabilization were mixed; some supported it, while others argued it would limit their ability to afford necessary repairs.
- Community members expressed skepticism about the effectiveness of a Rental Safety Inspection program.
- There were calls for stronger code enforcement to ensure landlords maintain their properties in safe and livable condition.
- Several community members expressed frustration with the eviction process, describing it as biased toward landlords and discriminatory.

Social Services & Community Needs

- Multiple people emphasized the need for more shelter options and housing for homeless individuals, including tiny home communities like Dignity Village.
- Several residents requested rental assistance due to high housing costs.
- Community members asked for job training programs to support economic mobility.
- There was a request for more education about behavioral health services and the availability of beds to reduce community fears and stigma.
- Residents noted a lack of street lighting, grocery stores, and bus stops as well as a need for additional animal control of loose dogs in certain neighborhoods.

Individual Correspondence

The County had several one-on-one communications via meetings, calls, mail, and email correspondence with local community members and local jurisdictions. The feedback is summarized as follows.

City of Ceres

The County met with the City of Ceres Department of Planning to discuss the Housing Element sites located within the City's Sphere of Influence. The City did not have any objections to the four sites proposed for rezoning for higher density residential. The City did note that there were sites identified as "Additional Opportunity Sites" that would be taken in order to accommodate the proposed Service/99 interchange and should not be counted among the County's opportunity sites. The eminent domain proceedings are anticipated to begin next year. Additionally, there are two other

properties that require small partial takes, including the southwest 0.01 acre of a site on Don Pedro, and the southern nine feet (0.03 acres) of a property on Service and Collins.

City of Oakdale

The County met with the City of Oakdale representatives to discuss the Housing Element site located within the City's Sphere of Influence, at 624 N. Stearns Road. The City's 2030 General Plan includes this property as "Future Specific Plan Area 8," but does not specify any land use designations for this property. Policy guidance suggests a potential for various housing opportunities and densities. Utility services such as water and sewer would be extended from just south of this property. However, the City did note that the City may need to rely on the site in question to achieve their own RHNA.

City of Modesto

The County reached out to the City of Modesto Planning Department to ask for input on sites within the Colorado/Rouse area, as the City is planning to annex the area in the future. The City provided the pre-zoned designations.

Xander Dev Co, LLC

An affordable housing developer reached out to the County to seek a list of sites to build 100 percent affordable multifamily housing. They suggested 624 N Stearns Rd in Oakdale as a potential site because it is in a high-resource area, which is important for affordable housing financing.

Local Constituents

Several local community members emailed voicing their concern regarding increased development leading to water shortages, traffic, air pollution, and nuisance to surrounding properties. One constituent argued that high density for the parcel between McHenry & Spy Glass Dr. (APN 004102005) would be inappropriate as it is far from retail and services, is not walkable, does not have sewage service, and is close to the environmentally sensitive Stanislaus River.

Stanislaus Union School District

Stanislaus Union School District wrote to the Planning Department raising concerns with school capacity and infrastructure to accommodate future growth. The district will continue to develop a ten-year plan to accommodate anticipated growth and asked for continued future partnership.

Property Owners

The County received a phone call from the property owners of one of the sites identified as a possible rezoning site. He asked about the project, and voiced supported inclusion of his property, as well as two additional properties. He also inquired about sewer service. The County provided an estimation of residential unit capacity.

Service Providers

The County reached out to the Keyes Community Services District, the City of Modesto Engineer, and to the Stanislaus County Local Agency Formation Commission to see if the sites identified in would be provided services. They all responded that they would be able to serve those parcels with water and sewer service.

Municipal Advisory Council Meetings

Three presentations were made to Municipal Advisory Councils (MACs) in September and October of 2023. A MAC, as formed by California Government Code Section 31010, is an advisory body of local citizens elected by the community or appointed by the Board of Supervisors with the purpose of representing the community to the Board of Supervisors. The South Modesto MAC meeting was held on September 14, 2013, the Denair MAC meeting was held on October 3, 2023, and the Keyes MAC meeting was held on October 19th, 2023. These presentations provided opportunities for in-person community outreach across the County. Each presentation provided an overview of the Housing Element and the Site Inventory. The following input was collected from the MAC meetings:

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

Public Review

Six comment letters were received during the first public review period from August 31 through September 30, 2023, and two letters were submitted in December 2023 and February 2024 in response to the second public review period. An additional letter was received from California Rural Assistance, Inc. (CRLA) on April 9, 2024. A summary of comments received, in response to the first and second public review drafts, are provided in Attachment 4. An overview of comments and how they were addressed in this draft are included in Table A-4 as follows:

Table A-4 2023 and 2024 Public Comment Summary and Response

Topic Area	Comment Summary	Response
Public Outreach	▪ Calls for additional outreach efforts to gather meaningful feedback and extension of the public comment period. ▪ Emphasis on the need for diligent efforts to achieve public participation from all economic segments ▪ Concerns about County's reliance on online platforms and lack of in-person events, and Municipal Advisory Council meetings, which excludes segments of the population with limited technological access. ▪ Suggestions for alternative outreach methods, such as using diverse media channels and physical locations for event notices.	The engagement process included community outreach and interviews with stakeholders that included community groups, development industry representatives, environmental organizations, and organizations that provide services for special needs populations. The County also conducted stakeholder interviews with local housing and community health advocates, farmworker housing advocates, and affordable housing consultants to gain an understanding of the housing conditions, issues, and opportunities in Stanislaus County. The feedback informed the discussion of constraints, contributing factors, meaningful actions, and the Housing Plan. The public

Topic Area	Comment Summary	Response
	▪ Calls to discuss previous housing element policies during workshops. ▪ Concerns over the complexity of online Sites Inventory tool for assessing proposed sites for housing.	comment survey reaffirmed that affordability and access to housing is the most urgent need within the County. Almost 40 percent of survey respondents had a household income of less than $50,000. The County conducted both in-person and virtual events to improve meeting accessibility for residents without digital access, and residents with travel difficulties. The MAC meetings allowed the County to reach remote a broader geographic locations. Additional detail regarding the in-person MAC meetings were added to the summary of public participation.
AFFH	▪ Development impacts must address segregation, gentrification, investment-driven displacement, and community feedback. ▪ Concerns of relying on nonprofit organization feedback rather than direct engagement with community residents. ▪ Summary of fair housing issues and enforcement issues need additional detail. ▪ Additional analysis of disproportional housing needs and risk of displacement is needed. ▪ Explanation of how contributing factors have been prioritized. ▪ Additional analysis on how the site inventory incorporates fair housing considerations, local data, demographic trends, and community input. ▪ Concerns that the site inventory exacerbates patterns of segregation and displacement. ▪ Concerns that the Housing Element adequately address environmental justice concerns and utilize tools like CalEnviroScreen to identify impacted communities.	A description of fair housing entities operating in Stanislaus County and their activities was added to AFFH, as well as a description of fair housing issues specific to Stanislaus County. Throughout the AFFH analysis, more context was given to data, using public input and local knowledge. An analysis of overlapping trends and patterns was added. Local knowledge was added throughout the Housing Element, particularly in Chapter 3, AFFH. This provided context to understanding patterns to inform policy development In segregation and integration analysis, additional sources of data and adjusted conclusions was incorporated accordingly. In the discussion of racially/ethnically concentrated areas of poverty (R/ECAPs), more context regarding relationship of unincorporated R/ECAPs to the City of Modesto and historical disinvestment trends was provided. In displacement risk analysis, added context and more local knowledge regarding demographic characteristics of areas at risk of displacement was included. CalEnviroScreen data was also discussed in more depth. An analysis of the Site Inventory and how it contributes to segregation and displacement is included in Chapter 3, AFFH. The selection of sites is mainly influenced by the availability of infrastructure and vacant sites. Additional information was added regarding Fair Housing enforcement and outreach capacity. More analysis was added on disproportionate housing needs, contributing factors, and prioritization of actions.

Topic Area	Comment Summary	Response
Constraints	▪ Additional analysis needed on how infrastructure deficits limits housing Development, particularly on a site or area level. ▪ Flood risk is a significant environmental constraint in western Stanislaus County. ▪ Table 4-3 on page 171 needs to cite both the zoning ordinance and the Stanislaus County Local Agency Management Program (LAMP) as sources to strengthen the case. ▪ In the Farmworker/Employee Housing section on page 175, the verbiage regarding the responsibilities of the County needs clarification. ▪ Department of Environmental Resources should be updated to reflect the correct California Code of Regulations. ▪ On page 179, Table 4-5, the R-A zoning designation lacks Onsite Wastewater Treatment System (OWTS) requirements, and the SCP-R-1 to SPR-R-3 zoning designations also lack OWTS requirements. These omissions need to be addressed.	A discussion of flood risk in the county was added. The role of the City of Modesto's Water Master Plan in the Salida Community Plan and program language in Action 2-1g was clarified. Additionally, clarification of existing regulations regarding manufactured home installation consistent with state law was added. All requested changes to language were accommodated. Chapter 5 includes an analysis of infrastructure on an area and site level.
Sites Inventory	▪ Concerns that the site inventory perpetuates segregation. Low resource or high segregation & poverty areas in the county include Airport, Bret Harte, Crows Landing, Empire, North Ceres, South Ceres, Turlock, and West Modesto, and a majority of lower-income units are allocated to these areas, with a significant concentration in R/ECAPs and West Modesto's highest segregation tract. Conversely, high or "highest" resource areas like Del Rio, Denair, Hickman, Oakdale, Salida, and Valley Home receive disproportionately more above-moderate income units. ▪ Concerns that the Sites Inventory needs a more realistic assessment of development potential and spatial analysis to address segregation or serve affordable housing needs. ▪ Additional analysis needed for sites smaller than half an acre and larger than 10 acres ▪ Additional analysis needed to identify infrastructure deficits and ensure feasibility of development. ▪ Need for a digital database for public review of the site inventory. ▪ Need to identify the geographic location of ADUs and their impact on segregation and affordable housing.	The Sites Inventory was modified to include moderate- and above-moderate income units on sites suitable for the development of housing affordable to lower income households. A more robust analysis of infrastructure availability was added to identify infrastructure deficits and confirm that any sites suitable for lower income units have (or will have) during the planning period. Added explanation of the location of lower income units is primarily due to the lack of municipal infrastructure (water and sewer) needed to facilitate the development of multi-family housing. A discussion of flood risk to sites was included in site inventory. Sites were removed sites that had a low likelihood of redevelopment and expanded analysis on nonvacant sites. The realistic capacity was revised and allowable densities of rezone sites to be consistent with Government Code section 65583.2(i). A breakdown of the Sites Inventory by each geographic area was added and the site inventory maps were modified to more clearly show each site and the associated address and other relevant information.

Topic Area	Comment Summary	Response
Programs	▪ Policies 1A and 1E should emphasize the County's existing responsibility to enforce housing and building codes. ▪ Policy 1D aims to preserve at-risk units of publicly assisted affordable housing, but clarification is needed regarding its implementation given the absence of such housing stock. ▪ Action 1-1a's rate of three households helped per year for housing rehabilitation assistance is deemed insufficient. ▪ Action 1-1c requires the maintenance of an existing program. ▪ Programs 1-2 and 1-3 entail updating local laws to comply with state regulations, which are legal obligations regardless of their inclusion in the Housing Element. ▪ Suggestions for effective low-income tenant protections include rent stabilization programs, good cause eviction ordinances, and protections against discrimination. ▪ Add programs to prevent displacement include expanding By Right Approval Program, neighborhood land banking, and relocation assistance programs. ▪ Action 2-2b potentially violates state law by increasing density bonuses for market-rate projects. Action 2-2b should be removed as it may undermine the intent of the Density Bonus Law and violate state regulations. ▪ Request to add a community members property to the Site Inventory. ▪ Modesto and Stanislaus must implement emergency housing while permanent housing be fast-tracked. ▪ Action 4-1a needs additional detail on the scoring criterion . ▪ Action 4-1b should mandate development of an ordinance instead of exploring, and should consider full accessibility along with universal design principles. ▪ Program 4-3 should focus on new actions rather than continuation of existing policies. Identify specific barriers to housing for homeless individuals. ▪ To effectively address the housing needs of unhoused individuals in the County, the County should conduct direct outreach with emergency shelters. ▪ Programs should include actions to address substandard housing conditions for farmworkers and other pathways to providing safe and sanitary farmworker housing.	Programs and actions were formulated based on the issues and needs, as well as feasibility. The following edits were made to incorporate the relevant public comments: ▪ Action 2-2b, regarding outreach to developers regarding new density bonus programs was removed. ▪ Policies 1A and 1E were revised. ▪ Policies for displacement risk and tenant protections were included in Program 1-4, Preservation of At-Risk Affordable Housing. ▪ Policies for unhoused individual outreach (4-3f), workshops on farmworker housing rights (4-2d), and safe and sanitary farmworker housing programs (4-2e) were added to the Housing Plan. ▪ Added an action to Program to 3-2 to maintain an administrative list of Measure E impacted lands that may be added to the Sites Inventory if and when the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County's remaining RHNA.

Topic Area	Comment Summary	Response
Infrastructure	▪ Existing Modesto Irrigation District facilities for electrical may not be adequate for the proposed housing Development	Each proposed housing development will be evaluated for availability of dry utilities prior to permitting approval and construction.
Housing Needs Assessment	▪ Concerns that more analysis of special housing needs (Section 2.5) is needed, including outreach to affected groups and organizations. ▪ Section 2.5.2 (Farmworker housing) needs additional analysis including the difference between permanent and seasonal farmworker needs, language barriers, and additional statistics. ▪ Analysis on deaf and blind residents should be included as they have unique needs. ▪ Mental health, substance use, and cognitive abilities should be discussed separately from homelessness.	Additional details about homeless service providers were incorporated, as well as corrections. Additional details gathered from the stakeholder interviews were added throughout the Housing Needs Assessment, particularly to address farmworker housing and persons with disabilities.

The third Housing Element draft was released for public review from January 28 through February 3, 2025 and again after additional edits were made to address preliminary comments received from HCD from March 25 through March 31, 2025. Three public comment letters were received during the public review period, from a resident requesting to have their property included in the rezone program, from the Valley Improvement Association (VIP) requesting the County conduct additional community outreach, and from CRLA. The fourth Housing Element draft was released for public review between July 15, 2025, to July 23, 2025 and again after additional edits were made to address preliminary comments received from HCD from September 18 through September 25, 2025. Five public comment letters were recieved during the review period, from a resident requesting to have their property included in the rezone program, from the Burbank Fire District, from the Salida Fire Protection District, and two letters from CRLA. A summary of comments received in response to the third and fourth public review are provided in Attachment 4. An overview of comments and how they were addressed in this draft are included in Table A-5 as follows:

Table A-5 2025 Public Comment Summary and Response

Topic Area	Comment Summary	Response
Public Outreach	The County's outreach, to date, has not been sufficiently diligent or frequent enough to reached the low-income communities in greatest need of housing and housing support	The County conducted additional outreach in April and May 2025, as detailed in Appendix A. They attended seven community events, targeting low-income, low-resource neighborhoods. Neighborhoods targeted include Crows Landing, Airport, Westside of the County, Parklawn, South Modesto, Rouse/Colorado, West Modesto. Community members provided feedback related to infrastructure, public works, housing and land use, costs, fees and assistance, tenant and landlord issues, and community needs.
Extremely Low-Income Households	The Housing Needs Assessment needs deeper analysis to examine critical issues, such as the intersection of extremely low-income (ELI) households with other vulnerable populations and factors, and the specific housing challenges that ELI households face, as well as the barriers they encounter in accessing County	The analysis of ELI households was expanded on in Section 2.5.6. Analysis was expanded to include the intersection of ELI households and special needs groups, cost burden, displacement, overcrowding, access to resources, and housing stock quality. Action 4-

Topic Area	Comment Summary	Response
	programs. Moreover, the proposed programs intended to assist ELI households are overly broad, lacking the precision and targeting needed to address their unique and disproportionate housing needs.	4d was expanded upon to target outreach to areas with high concentration of ELI households and promote language access.
AFFH	Additional fair housing analysis is needed to affirmatively further fair housing. Information relevant to R/ECAPs is needed and the Housing Plan needs to be updated in response to that analysis.	Housing Plan Programs 1-1, 1-3, 2-1, 2-3, 2-4, 2-5, 3-1, 3-6, 3-8, 3-9, and 5-1 have been updated with specific geographic targeting to further fair housing. Fair housing analysis has been expanded to include historical knowledge of housing issues in the Rouse-Colorado and Airport communities.
Infrastructure	The Housing Plan does not adequately address infrastructure deficiencies and its contribution to segregation by income in low-resource areas.	To combat issues of infrastructure gaps, Program 3-9 in the Housing Plan was updated to geographically target resources towards racially concentrated, low-income areas.
Programs	The current draft remains too general, and we strongly recommend that the program actions be more comprehensive, with specific details added to better address the unique needs of these communities. More targeted and detailed programs are essential to achieving meaningful outcomes and ensuring a lasting impact.	Housing Plan Programs 1-1, 1-3, 2-1, 2-3, 2-5, 3-1, 3-6, 3-8, 3-9, and 5-1 have been updated with discrete timing and specific metrics to have a measurable impact in addressing the needs of the community.
Programs	The Housing Plan must commit to taking specific action to prioritize providing technical assistance for affordable housing developers, incorporate public input into its zoning ordinance assessment strategy, commit to additional fair housing outreach during the planning period, and commit to place-based, community centered anti-displacement strategy.	The Housing Plan was updated to strengthen housing mobility and anti-displacement program actions. Housing Plan Programs 2-1, 2-3, 3-6, and 5-3 have been updated to accommodate suggested revisions.

Attachment 1

Housing Element Survey Results

Housing Element Survey Results

The County conducted a community survey to inform the 6th Cycle Housing Element update. This summary memorandum presents the results and key findings from the survey responses.

Survey Marketing Summary

A variety of outreach efforts were conducted to encourage survey participation, creating another opportunity for community members to engage in the overall General Plan Update process, to contribute their ideas, respond to choices, and help shape the direction of policies and programs. Below are some of the outreach efforts used to bring the survey to the community:

- Stanislaus County website (https://www.stancounty.com/planning/pl/housing-element.shtm)
- Stanislaus County social media accounts including Facebook, Twitter, and Instagram.

Methodology

The survey questions were developed by the consultant team with key input from the Stanislaus County Planning & Community Development staff. The survey was released to the public online on date and remained open until date. The survey was also made available during various community outreach events. A total of 148 people responded to the survey.

Survey Format

The survey consisted of 16 questions and used different formats for questions: checkbox, ranking, and open-ended questions. The checkbox questions asked respondents to indicate their preference for answer options. The ranking questions asked respondents to rank answer options from most to least important. The survey was made available in both English and Spanish. A copy of the complete survey is included in the Appendix.

Survey Results

The survey was presented in electronic form (online), and it should be noted that responses received may not represent the entire population being queried. Since only a portion of the county population responded, results do not represent the views or preferences of the entire County. However, the survey results can provide a general sense of residents' priorities and visions for the county of the topic areas presented. Complete survey results are included in the Appendix.

Question 1: Rank the housing needs facing unincorporated Stanislaus County from highest priority (1) to lowest priority (10)

Question 1 asked respondents to rank a list of housing-related needs within unincorporated Stanislaus County. Scoring for the survey question was based on how highly each item was ranked by each individual. The highest possible score for an item was ten, meaning every respondent selected that item as the highest priority housing need, and the lowest possible score was one,

meaning every respondent selected that item as the lowest priority housing need. The resulting scores were the following, listed from highest to lowest in Table 1.

Table 1 Responses to Question 1

Rank	Current Housing Need	Score
1	Need housing choices in lower price range to rent	6.8
2	Need housing choices in lower price range to own	6.6
3	Need more housing for seniors	5.8
4	Need homes that are affordable to first-time homebuyers	5.4
5	Need housing for people who work here	5.0
6	Need more housing for large families	4.8
7	Need more housing for multiple-generation families	4.5
8	Need more variety of housing types	4.0
9	All housing needs are being met	2.2

Based on a total of 148 responses, the "need for lower-priced rentals" was the highest scoring item with a score of 6.78. The "need for lower-priced homes for purchase" was a close second with a score of 6.57, followed by "need for more housing for seniors," with a score of 5.76, "affordable homes for first-time homebuyers," with a score of 5.40, "housing for people who work locally," with 4.98, "more housing for large families," with 4.84, "housing for multiple generation families," with 4.48, and "more variety of housing types," with 3.95. The lowest scoring item was "All housing needs are being met," with a score of 2.24.

Question 2: Select the top three housing needs for unincorporated Stanislaus County in the coming 10 years (check three)

Question 2 asked respondents to select the top three housing-related needs within unincorporated Stanislaus County in the coming ten years from a list of nine options. The highest possible score for an item was 100, meaning that every respondent had selected the item as one of the top three housing needs, and the lowest possible score was zero, meaning no respondent selected the item as one of the top three housing needs. The resulting scores were the following, listed from highest to lowest in Table 2.

Table 2 Reponses to Question 2

Rank	Future Housing Need	Score
1	Housing that is affordable to all	67%
2	More opportunities for home ownership	63%
3	More rental housing	35%
4	Repairs to older deteriorating homes	33%
5	Accessible and wide range of housing types for our aging population	29%
6	Various housing types to appeal to different lifestyles	24%
7	Housing near transportation and/or services	24%
8	Housing for multigenerational households and large families	14%
9	Other (please specify)	12%

Based on a total of 148 responses, the need for "housing that is affordable to all" was the highest scoring item with a score of 66.9. The need for "more opportunities for home ownership" was a close second with a score of 62.8, followed by the need for "more rental housing," with a score of 35.1, "repairs to older deteriorating homes," with 33.1, "accessible and wide range of housing types for our aging population," with 29.1, "various housing types to appeal to different lifestyles," with 23.7, "housing near transportation and/or services," with 23.7, and "housing for multigenerational households and large families," with 14.2. 11.5 percent of respondents selected "Other" and entered custom responses which are listed in Table 3 below.

Table 3 Custom Responses to Question 2

Affordable rentals
Affordable Senior Housing
Casas de bajos recursos
Homes with better access to public utilities like water and sewer.
Housing for the unhoused
housing policy that discourages short term rental and commuter homes/keeps community members closer to home
Housing prices/rent controlled
Incentives/Lower Fees to help reduce building costs
more NEW TRAILER PARKS, perhaps IN DEL RIO AREA
remove homeless
Repair homes for elderly & disabled, install/repair A/C and heating units for elderly & disabled. Finally have ALL EMS personnel (private, city & county) check on all elderly & disabled citizens twice a month.
Sidewalks
smaller, cheap housing for singles just trying to survive (i.e. under $300/mo)
sober living with program goal of independency

Question 3: Please rank each housing type based on what would be most successful in unincorporated Stanislaus County today (1 is most successful and 5 is least successful)

Question 3 asked respondents to rate 11 housing types on a scale from one to five based on which ones would be most successful in unincorporated Stanislaus County. The highest possible score for an item was five, meaning that every respondent ranked that housing type five out of five, and the lowest possible score was one, meaning that every respondent rated the housing type one out of five. The resulting scores were the following, listed from highest to lowest in Table 4.

Table 4 Results of Question 3

Rank	Most Successful Housing Types	Score
1	Co-housing (housing with an emphasis on community living i.e., shared open spaces, or kitchens)	3.6
2	Larger, custom homes	3.2
3	Single room occupancy (small apartment that may have a common kitchen)	3.1
4	Courtyard housing (housing arranged around a common courtyard)	2.9
5	Mid-rise (4-story) apartments	2.8
6	Micro-units (small studio apartments with full kitchens, Murphy beds (wall beds), drop-down surfaces like tables desks and more design features)	2.7
7	Accessory dwelling units (ADUs/second units/granny units/junior units)	2.6
8	Duplexes, triplexes, townhouses and low-rise multi-use buildings	2.3
9	Residential Care Facilities for Seniors or Persons with Disabilities	2.1
10	Single-story houses and condominiums	2.0
11	Senior housing allowing for aging in place (independent to assisted living) and meeting all income levels.	1.9

Respondents identified “co-housing” as the most potentially successful housing solution in unincorporated Stanislaus County with a score of 3.6 out of five. “Larger, custom homes” and “single room occupancy” homes with shared kitchens had similar scores with 3.2 and 3.1, respectively. Notably, single room occupancy apartments with common kitchens are similar to co-housing, suggesting respondents are open to housing options with common spaces. “Mid-rise apartments,” “micro-units,” and “accessory dwelling units” had comparable scores of 2.8, 2.7, and 2.6, respectively. The final four options all had similar ratings, notably all below 2.5 meaning that the survey respondents generally felt negatively towards them, with scores of 2.3, 2.1, 2, and 1.9.

Question 4: What do you believe are the most urgent housing issues in unincorporated Stanislaus County? (Rank the issues below with 1 being the most urgent)

Question 4 asked respondents to rank seven housing issues in unincorporated Stanislaus County in order from most to least urgent. The highest possible score for an item was seven, meaning that every respondent ranked the issue as the most urgent, and the lowest possible score was one, meaning that every respondent rated the issue as the least urgent. The resulting scores were the following, listed from highest to lowest in Table 5.

Table 5 Results of Question 4

Rank	Issue	Score
1	Affordability of housing	5.9
2	Availability of housing	5.5
3	Homelessness	4.8
4	Housing quality	3.5
5	Overcrowding	3.4
6	Fair housing/housing discrimination	3.3
7	There are no urgent housing issues	1.6

Respondents identified “affordability of housing” as the most urgent housing issue in the county by a significant margin with a score of 5.9 out of a possible seven. “Availability of housing,” which is connected with housing affordability, scored 5.5. “Homelessness” was identified as the third most urgent issue with a score of 4.8. Three subsequent issues scored less than 3.5, a significant drop from the top three: “Housing quality” scored 3.5, “overcrowding” scored 3.4, and “fair housing/housing discrimination” scored 3.3. Few respondents agreed that there are no urgent housing issues in the county, which scored 1.6.

Question 5: Using numbers from 1 through 6, with 1 being the best and 6 being the worst, please rank the areas where you believe housing should be developed in unincorporated Stanislaus County?

Question 5 asked respondents to rank six geographic categories based on their suitability for new housing. The highest possible score for an item was six, meaning that every respondent ranked the issue as most suitable for new housing, and the lowest possible score was one, meaning that every respondent rated the issue as the least suitable for housing. The resulting scores were the following, listed from highest to lowest in Table 6.

Table 6 Results of Question 5

Rank	Area Type	Score
1	Areas near public transit stops, employment, and shopping centers	4.80
2	Vacant Land on the edges of the cities and unincorporated communities	3.80
3	Areas with existing housing (increasing the number of units that could be built on each property such as with fourplexes, courtyard houses, and other types of apartment complexes)	3.52
4	Land that could be converted from commercial(office/store) to residential or mixed use (e.g., apartments or condominiums with ground floor stores or restaurants)	3.49
5	On existing single-family properties as accessory dwelling units (ADUs) or granny flats	3.00
6	Agricultural land on the edges of the cities and unincorporated communities	2.60

Respondents identified “areas near public transit stops, employment, and shopping centers” as the most suitable for new housing development by a significant margin with a score of 4.8. Respondents also indicated that “vacant land on the edges of the cities and unincorporated communities” was suitable for new housing with a score of 3.8. Respondents were mixed or indifferent towards increasing density within existing neighborhoods or commercial areas (3.52 and 3.49), and towards adding ADUs (3.0). Respondents generally considered agricultural lands as unideal options for new housing (2.6).

Question 6: Which fair housing services do you feel are most needed in our community? (Select all that apply)

Question 6 asked respondents to select fair housing services that were most needed in their communities and to suggest other relevant services. The highest possible score was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 7.

Table 7 Results of Question 6

Rank	Fair Housing Service	Score
1	Landlord/tenant counseling	68%
2	Education/information on tenant rights	65%
3	Promoting equal access to housing choice for all residents	51%
4	Assistance with filing a housing discrimination complaint	42%
5	Other (please specify)	18%

Respondents identified “landlord/tenant counseling” and “education/information on tenant rights” as the two most-needed services in their communities with similar scores of 68 percent and 65 percent respectively. About half of respondents selected “promoting equal access to housing choice for all residents,” and 42 percent selected “assistance with filing a housing discrimination complaint.” Eighteen percent of respondents selected “Other,” and left a total of 24 responses which are listed in Table 8 below.

Table 8 Custom Responses to Question 6

an entity to advocate for tenant rights that is free
money management courses
We don’t have fair housing problems
legal assistance for those facing eviction
Assistance with Utilities since people can hardly afford rent
Everything is already "FAIR" Stop with the nonsense
get the DA on the case looking for red lining and criminal conspiracy to keep rentals off the market.
No drug dealers using section 8 housing
Help finding housing and filling out forms.
Access to rapid rehousing and at risk of homelessness issues with one time or short term subsidy
Landlord rights
1 website that contains all affordable housing in Stanislaus w/ requirements - clear
Landlord outreach and engagement
homeless removal
Managing/minimizing rent increases in the middle of a pandemic/recession. Not cool at all but it happens to so many people I know, including myself.
Ability to build homes affordably
Allowing citizens to file a complaint against a landlord slum on the County or City apps?
Stop giving the homeless a handout! No one ever helped my momma buy a home, or helped with repairs!!! She worked hard for 45+ years and never received a handout AND SHE DESERVED HELP!!!
RENT CONTROL
If someone pays rent on time for say 3 year period there should be a loan program/grant that takes that into consideration for first time home buyers.
Senior citizen advocates
Biased question
rental caps
Landlords maintenance of property

Question 7: Which housing assistance services do you feel are most needed in our community? (Select all that apply)

Question 7 asked respondents to identify housing assistance services that are most needed in their communities. The highest possible score was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 9.

Table 9 Results of Question 7

Rank	Housing Assistance Service	Score
1	Down payment assistance for lower-income first time homebuyers	61%
2	Home repair assistance for low-income homeowners	57%
3	Rental assistance	48%
4	Education seminars for aspiring homeowners	32%
5	Financial assistance to build an accessory dwelling unit	31%
6	Other	10%

Respondents identified “down payment assistance for lower-income first time homebuyers” and “home repair assistance for low-income homeowners” as the most needed services in their communities with scores of 61 percent and 57 percent respectively. Slightly less than half identified “rental assistance” as a most-needed service, and less than a third identified “education seminars for aspiring homeowners” or “financial assistance to build an accessory dwelling unit” as most-needed services. 10 percent of respondents selected “Other”. Respondents left a total of 13 comments which are listed in Table 10 below.

Table 10 Custom Responses to Question 7

I feel that there could be successful use of existing county/state owned structures and properties that would ease the issue of homelessness in this county, reduce costs of labor for cleanup and road crews, and assist individuals with development of self-efficacy.
Helping disabled and elderly find homes/apartments they can afford.
Programs for middle class as there is no help for them and is getting harder to find affordable housing.
Stop with the "permit" requirements for everything
local codes to help new Mobile Home Parks that are owned by those that live there like a co-op... maybe county is land lord the first few years to get it going.
Consistent help with finding and filling out forms.
Assist families w/ deposit assistance
Rental subsidies
Funding for improving infrastructure in existing communities
RENT CONTROL
Homeless Housing Assistance
Down payment assistance for mid-income buyers that do not own a home
Beautification of properties

Question 8: Which Accessory Dwelling Unit (ADU) assistance services are most important?

Question 8 asked respondents to select the most important ADU services from a list of six items or to suggest other assistance services. The highest possible score for each item was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 11.

Table 11 Results of Question 8

Rank	ADU Assistance Service	Score
1	Advice on what type of ADU will work best for your situation	47%
2	Financial assistance with construction expenses	44%
3	Educational "How To" Webinar series regarding financing, construction, and permitting process	40%
4	Pre-approved ADU floorplans	34%
5	Education on how to become a landlord	29%
6	Homeowner one-on-one consultations with an ADU expert	29%
7	Other	10%

Respondents identified "advice on what type of ADU will work best for your situation" as the most important service for aspiring ADUs owners with a score of 47 percent, followed by "financial assistance with construction expenses," with a score of 44 percent and "educational "How To" Webinar series regarding financing, construction, and permitting process," with a score of 40 percent. About a third of respondents selected "Pre-approved ADU floorplans," "Education on how to become a landlord," and "Homeowner one-on-one consultations with an ADU expert," with scores of 34 percent, 29 percent, and 29 percents respectively. Ten percent of respondents selected "Other", and respondents left a total of 13 individual comments which are listed below in Table 12.

Table 12 Custom Responses to Question 8

Only approved in areas that can handle population density.
NO ADU PERMITS
Should be not for rent.
Offering a different company other than PGE
how to keep the on street parking from being a problem.
Programs and grants available
Public facility fee, school and fire fee waivers
Granny apartments NOT for the homeless!
Don't think this is important
None of the Above
Accessory dwelling eco options, solar install incentives or charging ports for electric cars s, sola
Down payment assistance for mid-income buyers that do not own a home
Beautification of properties

Question 9: Would you be interested in developing an ADU (e.g. granny flat, in-law unit) on your property?

Question 9 surveyed respondents on their interest in developing an ADU. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed in Table 13 below.

Table 13 Results of Question 9

ADU Interest	Percent
Yes, on my existing or future property	39%
I already have an ADU on my property	1%
Not sure	20%
No	40%

Approximately 60 percent of respondents had at least some interest in building an ADU, while 40 percent of respondents did not. Only one respondent had already built an ADU on their property.

Question 10: Which best describes your current housing situation?

Question 10 asked respondents to identify their current housing ownership situation by selecting from a list of five options, or to select "Other" and enter a custom answer. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 14.

Table 14 Results of Question 10

Housing Situation (Own, Rent, or Other)	Percent
Own my house, condominium, apartment, or mobile home	64%
Rent a house, condominium, apartment, or mobile home	28%
Live with friends/family, do not own or pay rent	3%
Live with roommates/family and pay rent or assist with mortgage payments	4%
Live in emergency, transitional, or supportive housing	0%
Other	2%

The overwhelming majority of respondents owned their homes (64 percent). One third of respondents rent or assist another person with rent, and five percent of respondents are in some other living situation. Two custom responses were received and are listed in Table 15 below.

Table 15 Custom Responses to Question 10

Currently in HUD apartment after waiting 2 years.
family own home, I pay mortgage

Question 11: Which best describes your current living situation?

Question 11 asked respondents to identify their current housing companion situation by selecting from a list of six options, or to select "Other" and enter a custom answer. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed in Table 16 below.

Table 16 Results of Question 11

Housing Situation (Housing Companions)	Score
Live with spouse or significant other and children	45%
Live with spouse or significant other	22%
Multiple generations living together (adult children, parents, grandparents, etc.)	13%
Live alone	6%
Live with roommates	3%
Live with parents	1%
Other	10%

The overwhelming majority of respondents live with a family member with a total of 81 percent of responses. Six percent of respondents live alone, three percent live with roommates, and 10 percent selected "Other". Respondents left 14 custom responses were received which are listed in Table 17 below.

Table 17 Custom Responses to Question 11

Parent. Children live with me, one is an adult in college
Live with minor child, no spouse
single parent with children
Live with child
Live w/ spouse, children, and elder parent
W/son
Single parent with two children
Single parent with dependent children
Just me and my two dogs, why complicate my life. LOL
Live with sibling
Single Father w/ child
Live with children
Single mother providing house for two children
Caring for older parent in my home

Question 12: Which of the following housing quality issues, if any, do you feel apply to your current living situation?

Question 12 asked respondents to identify housing quality issues from a list of six options plus an "Other" option. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 18.

Table 18 Results of Question 12

Rank	Housing Quality Issue	Score
1	None of the above	40%
2	Lack of energy efficiency	19%
3	Housing structural/maintenance issues	18%
4	Other	11%
5	Overcrowding within the household	5%
6	Lack of access to adequate plumbing	3%
7	Poor indoor air quality	3%
8	Lack of access to adequate kitchen facilities	1%

40 percent of respondents did not identify a housing quality issue, while another 37 percent identified either "lack of energy efficiency" or "housing structural/maintenance issues," with scores of 19 percent, and 18 percent, respectively. "Overcrowding within the households," lack of adequate plumbing," "poor indoor air quality," and "lack of access to adequate kitchen facilities" made up another 12 percent of responses. 11 percent of respondents selected "Other", and left 13 custom answers which are listed in Table 19 below.

Table 19 Custom Responses to Question 12

Cost of PGE
could really use a ADU, my mother has a deteriorating chronic condition, we love our small home and don't want to give it up but having her onsite would address potential future safety issues. My father-in-law is going through a serious medical issue and we don't fill we have enough space to invite him to come stay until things stabilize.
Espacio de casa muy chica y renta muy costosa ayúdenme por favor soy padre de 2 hijas y mi esposa no trabaja yo pago todos los gastos y me quedo sin dinero durante 15 días ayuda por favor
homeless are contaminating rivers, well water
Lack of access to adequate plumbing, poor indoor air quality, housing structural/maintenance issues, lack of energy efficiency
lack of clean air from all the 'harvest dust' unequal access to water.
Lack of space and affordability
Las calles no tienen banquetas y se ase mucho cochinero
multiple issues, but livable. most concern is pest control, structural concerns, consistent plumbing issues
Permit fees
poor access to public transit and city services, no walkability
The roads on my side of town have been neglected for decades
Updating (1955 House)

Question 13: Which type of housing do you currently occupy?

Question 12 asked respondents to identify their current housing type. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 20.

Table 20 Results of Question 13

Rank	Current Housing Type	Score
1	Single-family home	72%
2	Condominium/Townhome	7%
3	Apartment	6%
4	Duplex/triplex	5%
5	Other	4%
6	Mobile home	3%
7	I do not currently have a permanent home	1%
8	Co-op housing	1%
9	ADU	1%
10	Group home/assisted living	0%

The overwhelming majority of respondents live in single-family homes with 72 percent, while the remaining respondents live in a variety of multi-family homes. One respondent lives in an ADU, and two respondents do not currently have permanent homes. Four percent of respondents selected "Other", and left a total of 13 custom responses which are listed below in Table 21.

Table 21 Custom Responses to Question 13

Apartamento
No aplica
Casa
Casa
No ocupo
Casa pequeña tipo estudio
Updating (1955 House)
Lack of access to adequate plumbing, poor indoor air quality, housing structural/maintenance issues, lack of energy efficiency
Permit fees
Lack of space and affordability
poor access to public transit and city services, no walkability
Espacio de casa muy chica y renta muy costosa ayúdenme por favor soy padre de 2 hijas y mi esposa no trabaja yo pago todos los gastos y me quedo sin dinero durante 15 días ayuda por favor
Las calles no tienen banquetas y se ase mucho cochinero

Question 14: Optional: What is your total household income?

Question 14 asked respondents to identify their household income level. The results are listed in Table 22 below.

Table 22 Results of Question 13

Household Income Level	Score
$100,000+	25%
$50,000 to $74,000	19%
$75,000 to $99,999	18%
$25,000 to $49,000	16%
Decline to state	12%
Less than $25,000	10%

Question 15: Let us know if there is anything we missed! Below, provide other comments you would like to make pertaining to housing issues, housing types, or the provision of housing in Stanislaus County.

Question 15 was a call for open-ended answers. A total of 44 custom responses were received, and are listed below in Table 23.

Table 23 Answer for Question 15

Más acceso a las viviendas
the continued acceptance of higher rent rates is growing in our area, which will undoubtedly lead to higher numbers of homeless in the area. Making use of county/state-owned buildings, properties, and land, and converting them into housing /programs could benefit the area.
Salida and other unincorporated areas should not shoulder the responsibility of low income housing. Bad rentals are a major problem.
When social security income is raised, please do not raise HUD/Assistance rental amounts too much.
Para la case media, que ayuda nos pueden asistir , ya que no calificó para ningún servicio público !
Que sean mas accesibles sin nevesidad de un seguro
K las rentas bajen están muy caras
Ayuda para comprar casa por primera vez a personas que ganan 18 dólares la hora por favor soy padre de 2 hijas y esposo, no me alcanza el dinero y no bebo alcoho ni fumo no tengo vicios, soy trabajador pero me pagan poco.
I'm more concerned about the fact that people dump trash all over the area. How about finding a solution for that because it's unsanitary.
I am for Rental assistance for homeless families who are working and can't find affordable rentals. As a taxpayer I feel that there needs to be assistance/rehab for homeless to gain job training- if they can show they obey the law and be a part of the working members society to gain assistance.
Sidewalks
Need help removing inground pool due to high cost of maintenance and deteriorating pipes
Some people don't care about having all the utility amenities, they just want a cheap space of their own with a locking door, the county restrictions for landlords make this type of affordable option illegal to provide. Also trash removal from homeless/people living in vehicle, falls on landowner/homeowner, and this is not fair when the county makes evicting people such a difficult & time consuming process.
Middle class gets no breaks.
Speed up approval process

Bus out all homeless and liberals.
Need one or more questions about living in a community of non traditional units such as a small home community that consists of mostly factory built/prefab units of no more than 900 sq ft. These would be new 'mobile home' type parks.
Horizontal mixed-use zoning of areas targeted for housing development could be helpful.
you completely missed the lower rung steps of owning a home here in plantation country the "Mobile Home Parks"
We need police and sidewalks.
Number one issue is the substance abuse and mentally ill. Need safe sober program housing with 24 hour security, possibly locked facilities. We often see vulnerable people who clearly cannot care for themselves that are often violated as they are easy targets.
Access to safe drinking water. Education on land use/septic systems.
Transitioning less desirable neighborhoods into desirable neighborhoods would be a positive in Stanislaus County. Parks need to be cleaned up, maintained, and have security so kids can actually play at them. I wish the county would stop allowing more shopping centers to be built and leaving other ones vacant, and I wish the county would have a plan of action in regards to homelessness by building more housing for them in parts of the county and not allowing tents to be plopped up everywhere and anywhere.
Families might be best supported if job, child care and housing were taken in consideration at the same time. Parents want to provide for their children but these 3 things tend to be connected. One w/o the other makes it hard to thrive in this community.
Revisit the base line income for low income housing it’s awful low there are potential homeowners left out as they are not considered low income . They fall between the gap.
Based on income- There should be a question related to whether individuals are spending more than half of their monthly after-tax income on housing payments or rent. The reality is if a person makes under $50,000 per year, they are spending approx. 3/4 of their income on a 2-bedroom home or apartment in most cases. The problem is all of these things but also how to ensure people are not living paycheck to paycheck thus causing a family to become homeless when an emergency occurs.
homeless are really becoming an issue next to the VFW. Very poor conditions. Violent, trespassing, theft, unsanitary, noisy, drugs/drug paraphernalia. Please keep the area clean and a nice place to live-remove them. it is not safe or my children or elders. even on our own property we come face to face, very scary. Please start with homeless removal before any development plans. Homes are being robbed as it is. cant imagine all the theft on a jobsite nearby. thanks.
State mandates for new housing will continue to make housing less affordable in CA.
I think that landlords need to be held better accountable for not being good landlords. For example, I've been paying rent at my place of residence for over 10 years now. Out of the 10 years, my shower in my bathroom is basically falling through the floor leaving it un-useable. I have not used my shower in my bedroom for over two years because my landlord says "I have not been able to find anyone who can repair that. COVID has made contractors/repair men less available". Can you believe that? So essentially I've been paying for a bathroom I CANNOT USE! Plus, the rent has increased. How is this fair?
Education for homeowners on how to find the right contractor, landscaper, plumber, electrician, etc.
I teach college. My students are having trouble finding places to live with affordable rents. This even applies to my students who are graduates with teaching jobs. They can barely afford their rent, even thought they are working full time. The option to buy a home should be open to all essential workers!!
A HUGE overhaul of the Housing Authority in needed - a in-depth audit of all units such as: how many years has a family lived in a unit? when was the last time the applicant's application was reviewed? Considering implementing a limit on the years a unit is occupied, because I know of families who decades later are still living in the same units.... basically milking the system while our homeless families and veterans struggle. The reviews on Google should be a HUGE indicator of the ongoing issues at the Housing Authority - see below. Housing Authority of Stanislaus County 1701 Robertson Rd, Modesto, CA 2.7 (OUT OF 5.00, THIS IS A VERY LOW SCORE) 71 reviews
Buckle down, and enforce the homeless laws! Do not allow homeless to set up “tent cities” or live in their vehicle!!! The biohazards and health hazards the homeless create are so overwhelming in our once beautiful county! As a result of the homeless, living wherever they want, all I see is garbage & trash heaps, land deterioration, areas in downtown where homeless have openly defected in flowerbeds! Our community is not a open toilet, or rubble pile! We are a family oriented community with hard working families and children to raise! Children and adults alike should NOT be subjected

to seeing filth, squaller, and makeshift “homes” because transients refuse to abide by simple regulations, rules and laws!!! I can go on….. however I’m sure I’ve made my statement clear, and I don’t stand alone!!!
Rent costs are not equivalent to the current income guidelines for people in rural areas.
More Questions about Homeless Suggestions
I think that if anyone pays rent, always on time and paid in full that there should be programs that take that into consideration for buying their own home. Rent often times is higher than a mortgage. If someone is consistently paying rent that is high, then why shouldn’t that be considered on a loan application? Makes no sense.
I would like to see more affordable housing options available (Rent/Own) within the county. I would like to see both high end and lower income Apartment/Condominium units become available in the county. Higher density, smaller, affordable units.
Community oriented solar/charging incentives for unincorporated homes. Were limited to only statewide option, the ones without city backed options
Zoning violations and non-permit building common in my area.
Housing for homeless - convert abandoned motels, make tiny home (like mobile home parks) for homeless. Affordable spaces that they can live in, that do not create the issues "homeless camps" along streets/highways do.
Home ownership incentives for new/existing homeowners purchasing homes within 30 miles of their workplace, keeping residents local.
Instead of allowing people to take advantage of the services when they don’t need them they should expire. So many people are getting help with housing, food, etc. and taking advantage and will do this for the remainder of their lives and then their kids will do the same. Make an expiration date and make people get jobs and help the people that really need it but can’t get it due to the people taking advantage. Most of these people are living beyond the means of two working parents.
Rent is unaffordable and increasing the max every year Too hard to buy a house can't save money
Deal with slumlords and dilapidated housing

Question 16: Please identify which part of unincorporated Stanislaus County you identify with as your residence

Question 16 asked respondents to select their community from a list of 23 unincorporated communities in Stanislaus County, as well as offering an “Other” option. The results are listed below in Table 24.

Table 24 Results for Question 16

Community	Total % of Respondents
Other	33%
West Modesto	24%
Salida	8%
South Turlock	7%
Denair	6%
Empire	5%
Crows Landing	5%
North Ceres	3%
South Ceres	2%
Airport	2%
Bret Harte	2%
Valley Home	2%
Hickman	1%
Knights Ferry	1%
Westley	1%
Cowan Tract	0%
Del Rio	0%
Diablo Grande	0%
Grayson	0%
Keyes	0%
La Grange	0%
Monterey Park	0%
Riverdale Park	0%
Parklawn	0%

A total of 36 custom responses were received and are listed below in Table 25.

Table 25 Custom Responses for Question 16

NE Modesto
South East Modesto
Modesto
I work in Stanislaus County with Seniors & Homeless, I live outside the county
n/a not near unincorporated. area, but own rentals in the Airport area.
north east Modesto
Riverbank
Riverbank
Oakdale
Live in Modesto
Between Oakdale and Riverbank
not an unincorporated resident
City of Modesto
Newman
Hughson
Northeast Modesto
North East Modesto
Newman
Riverbank area
We live in North East off Scenic Dr
Oakdale
Waterford
Oakdale
East Modesto
Woodland West
Downtown Modesto/College Area
Village One
East of Modesto
Oakdale
Scenic dr.
Modesto
Don’t live in unincorporated area
Riverbank
Turlock
Modesto
Ceres

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Attachment 2

Stanislaus County Housing Element Update Survey

Stanislaus County Housing Element Update Survey

What are our Housing Element Issues and Opportunities?

Stanislaus County is preparing an update to the General Plan Housing Element. The Housing Element includes the County's housing goals and policies for the 2023-2031 planning period. The County's Housing Element covers only the unincorporated areas and does not include areas located within a city.

Housing issues affect the entire community — renters, homeowners, employers who are seeking to hire and retain workers, and community members with special housing needs. The purpose of this survey is to identify any unique housing issues in the unincorporated areas of Stanislaus County to assist County staff to craft solutions that meet the needs of everyone in the community.

This confidential survey asks your opinions about current housing conditions, unique housing opportunities that can influence future housing in Stanislaus County, and yourself. The County will use your responses to better understand and respond to the community's sentiments about future housing growth. All input will remain anonymous.

1. **Rank the housing needs facing unincorporated Stanislaus County from highest priority (1) to lowest priority (10):**
   - Need housing choices in lower price range to rent
   - Need housing choices in lower price range to own
   - Need more housing for seniors
   - Need more housing for large families
   - Need more housing for multiple-generation families
   - Need homes that are affordable to first-time homebuyers
   - Need housing for people who work here
   - Need more variety of housing types
   - All housing needs are being met
   - Other (please specify)

2. **Select the top three housing needs for unincorporated Stanislaus County in the coming 10 years (check three):**
   - Housing that is affordable to all
   - Repairs to older deteriorating homes
   - Accessible and wide range of housing types for our aging population
   - Housing near transportation and/or services
   - Various housing types to appeal to different lifestyles
   - Housing for multigenerational households and large families
   - More opportunities for home ownership
   - More rental housing
   - Other (please specify)

3. **Please rank each housing type based on what would be most successful in unincorporated Stanislaus County today (1 is most successful and 5 is least successful):**

Housing Type	Most Successful	Least Successful
Accessory dwelling units (ADUs/second units/granny units/junior units)		
Co-housing (housing with an emphasis on community living ie: shared open spaces, or kitchens)		
Courtyard housing (housing arranged around a common courtyard)		
Micro-units (small studio apartments with full kitchens, Murphy beds(wall beds), drop-down surfaces like tables or desks and more design features)		
Single room occupancy (small apartment that may have a common kitchen)		
Mid-rise (4-story) apartments		
Duplexes, triplexes, townhouses and low-rise multi-use buildings		
Residential Care Facilities for Seniors or Persons with Disabilities		
Larger, custom homes		
Single story houses and condominiums		
Senior housing allowing for aging in place (independent to assisted living) and meeting all income levels.		

4. **What do you believe are the most urgent housing issues in unincorporated Stanislaus County? (Rank the issues below with 1 being the most urgent)**
   - Affordability of housing
   - Availability of housing
   - Homelessness
   - Overcrowding
   - Fair housing/housing discrimination
   - Housing quality
   - There are no urgent housing issues
   - Other (please specify)

5. **Using numbers from 1 through 6, with 1 being the best and 6 being the worst, please rank the areas where you believe housing should be developed in unincorporated Stanislaus County:**
   - Areas near public transit stops, employment, and shopping centers
   - Agricultural land on the edges of the cities and unincorporated communities
   - Vacant Land on the edges of the cities and unincorporated communities

- Areas with existing housing (increasing the number of units that could be built on each property such as with fourplexes, courtyard houses, and other types of apartment complexes)
- On existing single-family properties as accessory dwelling units (ADUs) or granny flats
- Land that could be converted from commercial (office/store) to residential or mixed use (e.g., apartments or condominiums with ground floor stores or restaurants)

6. **Which fair housing services do you feel are most needed in our community? (Select all that apply)**
   - Landlord/tenant counseling
   - Education/information on tenant rights
   - Promoting equal access to housing choice for all residents
   - Assistance with filing a housing discrimination complaint
   - Other (please specify)

7. **Which housing assistance services do you feel are most needed in our community? (Select all that apply)**
   - Home repair assistance for low-income homeowners
   - Rental assistance
   - Education seminars for aspiring homeowners
   - Financial assistance to build an accessory dwelling unit
   - Down payment assistance for lower-income first time homebuyers
   - Other (please specify)

8. **Which Accessory Dwelling Unit (ADU) assistance services are most important?**
   - Pre-approved ADU floorplans
   - Educational "How To" Webinar series regarding financing, construction, and permitting process
   - Homeowner one-on-one consultations with an ADU expert
   - Financial assistance with construction expenses
   - Education on how to become a landlord
   - Advice on what type of ADU will work best for your situation
   - Other (please specify)

9. **Would you be interested in developing an ADU (e.g. granny flat, in-law unit) on your property?**
   - Yes, on my existing or future property
   - No
   - Not sure
   - I already have an ADU on my property

10. **Which best describes your current housing situation?**
    - Own my house, condominium, apartment, or mobile home
    - Rent a house, condominium, apartment, or mobile home
    - Live with friends/family, do not own or pay rent
    - Live with roommates/family and pay rent or assist with mortgage payments
    - Live in emergency, transitional, or supportive housing
    - Other (please specify)

11. **Which best describes your current living situation?**
    - Live alone
    - Live with roommates
    - Live with spouse or significant other
    - Live with spouse or significant other and children
    - Live with parents
    - Multiple generations living together (adult children, parents, grandparents, etc.)
    - Other (please specify)

12. **Which of the following housing quality issues, if any, do you feel apply to your current living situation?**
    - Lack of access to adequate plumbing
    - Lack of access to adequate kitchen facilities
    - Poor indoor air quality
    - Overcrowding within the household
    - Housing structural/maintenance issues
    - Lack of energy efficiency
    - Other (please specify)
    - None of the above

13. **Which type of housing do you currently occupy?**
    - ADU
    - Apartment
    - Condominium/townhome
    - Co-op housing
    - Duplex/triplex
    - Group home/assisted living
    - Mobile home
    - Single-family home
    - I do not currently have a permanent home
    - Other (please specify)

14. **Optional: What is your total household income:**
    - Less than $25,000
    - $25,000 to $49,000
    - $50,000 to $74,000
    - $75,000 to $99,999
    - $100,000+
    - Decline to state

15. **Let us know if there is anything we missed! Below, provide other comments you would like to make pertaining to housing issues, housing types, or the provision of housing in Stanislaus County.**

16. **Please identify which part of unincorporated Stanislaus County you identify with as your residence:**
    - Airport
    - Bret Harte
    - Cowan Tract
    - Crows Landing
    - Del Rio
    - Denair
    - Diablo Grande
    - Empire
    - Grayson
    - Hickman
    - Keyes
    - Knights Ferry
    - La Grange
    - Monterey Park
    - North Ceres
    - Riverdale Park
    - Salida
    - Parklawn
    - South Ceres
    - South Turlock
    - Valley Home
    - Westley
    - West Modesto
    - Other

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Attachment 3

Community Engagement Materials

Stanislaus County

2023-2031 Housing Element Update

Welcome!

Stanislaus County has kicked off an update to the Housing Element to plan for housing through 2031. The update is scheduled for completion at the end of 2023, and throughout the process, we invite the public to be part of the planning process and provide input on how Stanislaus County can support housing development over the planning period (2023-2031).

What is a Housing Element?

The purpose of the Housing Element is to identify and analyze existing and projected housing needs to support housing preservation, improvement, and development for all economic segments of the community.

What other elements are being updated? Why?

As part of the Project, the County will be conducting a technical update to the 2015 Stanislaus County General Plan with an update of the Safety Element and preparation of Environmental Justice policies.

Environmental Justice Element

Senate Bill 1000 (Leyva, 2016) amended Government Code Section 65302 to require that California cities and counties that have disadvantaged communities incorporate Environmental Justice policies into their general plans. The purpose of the law is to address the "unique or compounded health risks" in disadvantaged communities by decreasing pollution exposure, increasing community assets, and improving overall health. The Environmental Justice Element will:

- **Address goals, policies, and programs pertaining to educational attainment, pollution burden of disadvantaged communities, and identification of burdensome quality of life metrics including poverty, unemployment, linguistic isolation, and health.**
- **Align with the Governor's Office of Planning and Research Guidelines for Environmental Justice**
- **Rely on CalEnviroScreen 4.0 to determine areas of concern regarding environmental justice issues.**

Safety Element Update

The Safety Element identifies and includes policies and programs to reduce the impact of natural and man-made hazards that may threaten the health, safety, and property of Stanislaus County residents, business owners, and visitors. The State of California General Plan Guidelines state that the aim of the Safety Element is to reduce the potential risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, earthquakes, landslides, and other hazards. The Safety Element Update will:

- **Ensure consistency with other General Plan elements**
- **Ensure compliance with State law**
- **Incorporate information from the Draft 2022 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, with an understanding that the existing plan is currently in the update process**
- **Address AB 747, General Plan Safety Elements; SB 99, Safety Elements, Emergency Evacuation Routes; SB 379, Climate Adaptation and Resiliency; SB 1035, General Plans; and SB 1241, Fire Hazard Impacts.**

Meeting Our Housing Goals

What is the Regional Housing Needs Allocation?

In the process of updating the Housing Element, each jurisdiction, city, and county is required to accommodate its fair share of the regional housing need. The Regional Housing Needs Allocation (RHNA) is the process used to determine housing allocations for each jurisdiction. As part of the RHNA, HCD determines the total number of housing units needed across California over the next decade. The Stanislaus Council of Governments (StanCOG) is then tasked with developing a methodology to determine the number of housing units for each incorporated and unincorporated jurisdiction in Stanislaus County, which is required to provide sites for housing. Under State law, the RHNA is assigned to the following four income categories which are based on a percentage of the Area Median Income (AMI):

- **Very Low Household Income (<50% AMI)**
- **Low Household Income (51-80% AMI)**
- **Moderate Household Income (81-120% AMI)**
- **Above Moderate Household Income (>120% AMI)**

In August 2022, StanCOG updated their methodology for RHNA allocations for each city in the county and for the unincorporated county. The table below shows the RHNA goals assigned to each jurisdiction. Stanislaus County is responsible for the RHNA requirement related to the unincorporated county. As shown, the County must provide for residential capacity through zoning to accommodate 2,475 new units, including 574 very low-income units and 398 low-income units. To meet very low- and low-income unit goals, the County must identify sites adequate for residential development that allow for development at 20 dwelling units per acre.

Cycle 6 Final Adopted Methodology Summary Table

Jurisdiction	Lower Income Units				Higher Income Units		Total RHNA
	Very Low	Low	Very Low + Low	% of Total RHNA	Moderate	Above Moderate	
Ceres	706	489	1,195	35.6%	661	1,505	3,361
Hughson	284	196	480	54.5%	122	279	881
Modesto	2,807	1,943	4,750	42.2%	1,981	4,517	11,248
Newman	197	136	333	31.8%	218	497	1,048
Oakdale	414	286	700	42.0%	294	671	1,665
Patterson	1,046	724	1,770	47.6%	593	1,353	3,716
Riverbank	970	672	1,642	45.7%	594	1,355	3,591
Turlock	1,305	903	2,208	38.1%	1,096	2,498	5,802
Waterford	107	74	181	32.5%	115	261	557
Unincorporated County	574	398	972	39.3%	458	1,045	2,475
Total	**8,410**	**5,821**	**14,231**	**41.4%**	**6,132**	**13,981**	**34,344**

Stanislaus County

2023-2031 Housing Element Update

The Sites Inventory Process

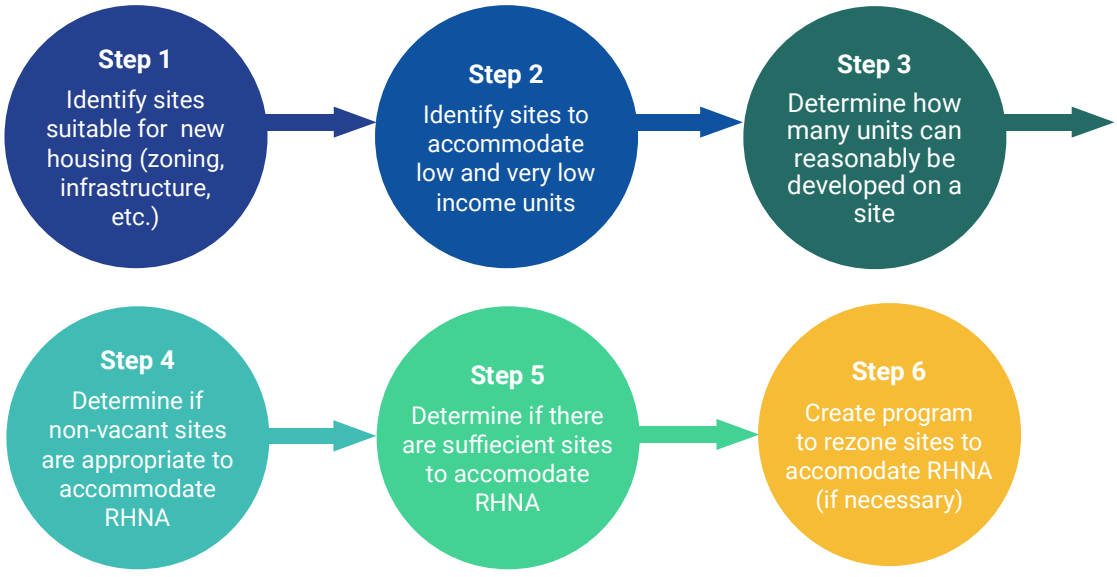
The site inventory is a required component of the Housing Element used to identify specific sites to meet the RHNA allocation for the unincorporated county. The sites inventory process is a labor-intensive and potentially controversial component of the Housing Element Update. Stanislaus County will need to evaluate General Plan land uses and the zoning code to determine whether there is enough land available to accommodate the assigned RHNA allocation for each income category. If unable to accommodate the RHNA, the County will need to plan to rezone enough land to meet the RHNA obligation.

Sites or credits in the inventory can include:

- Housing projects under review or approved through Planning and expected to be built during the planning period
- ADU trends
- County-owned sites with housing in line with County goals
- Residentially zoned vacant sites or non-vacant sites with redevelopment potential
- Sites that would be rezoned to permit residential uses or higher density

Site considerations:

- Environmental constraints and utility access
- Redevelopment potential/feasibility
- Sites identified for lower income must meet density and site requirements
  - » Appropriate density: 20 units per acre
  - » Appropriate parcel size: between 0.5 and 10 acres
  - » Access to high performing schools, jobs, amenities (i.e., parks and services), health care facilities, and grocery stores



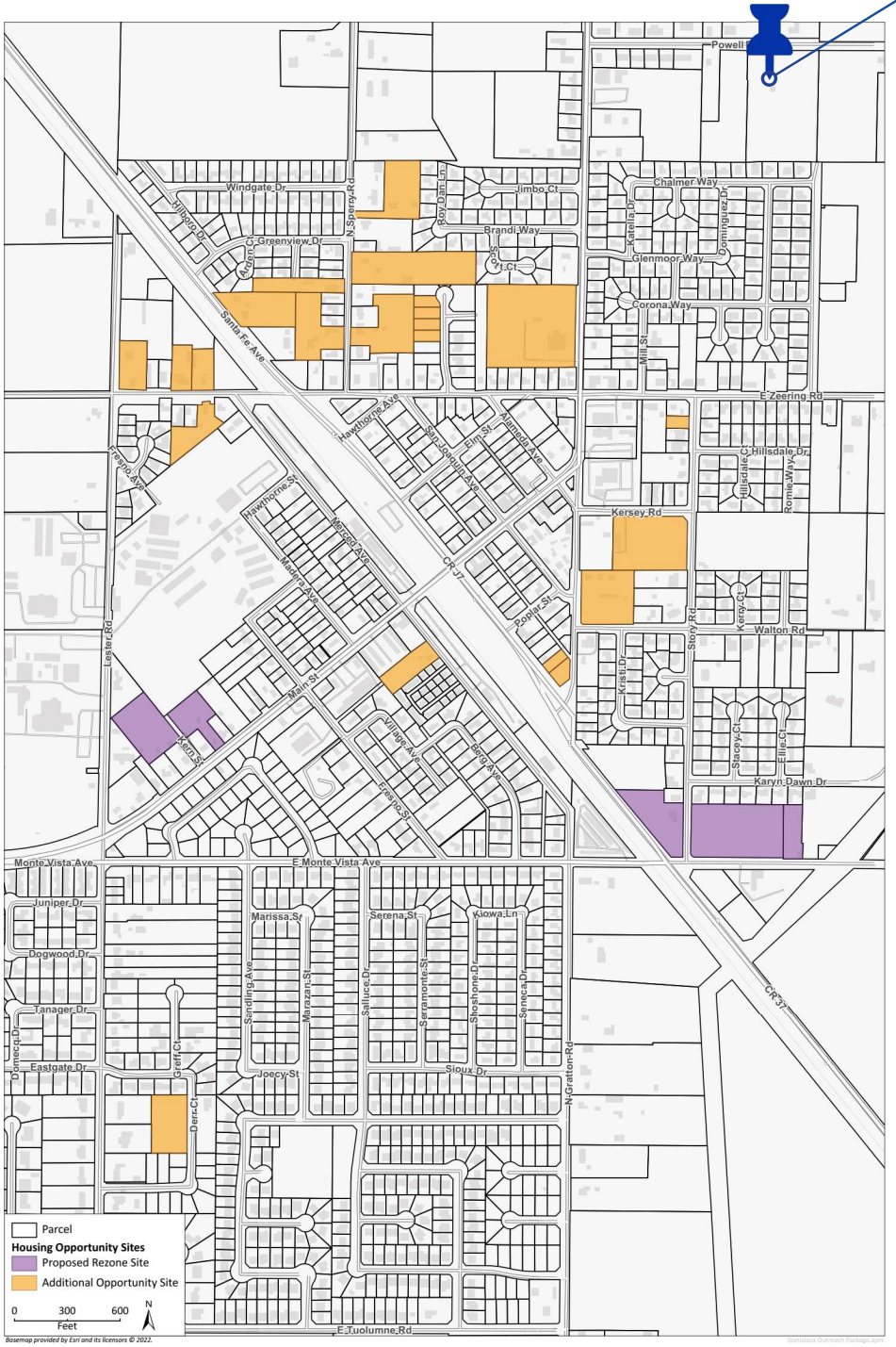
Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in Denair?

Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in Denair?

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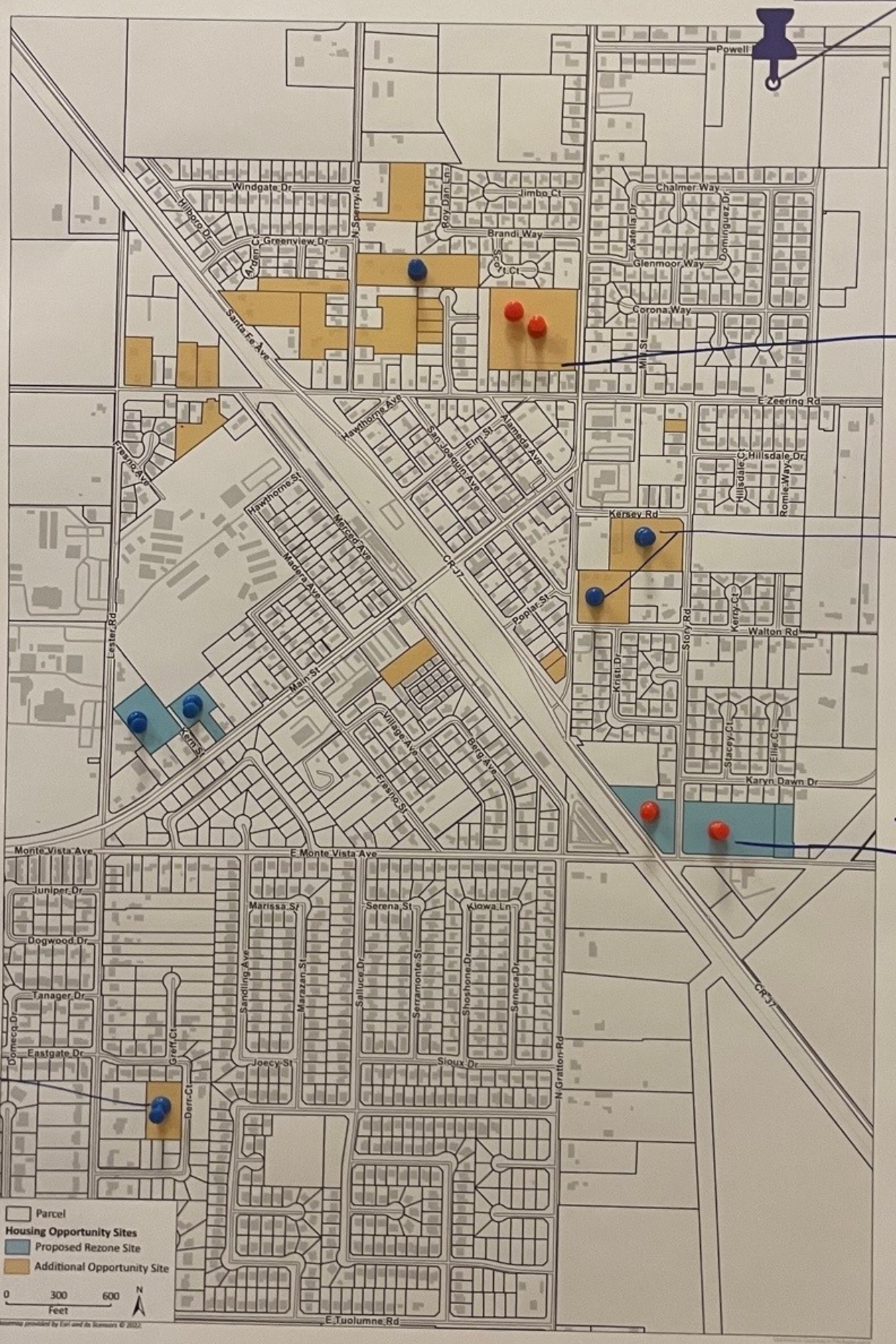
Draw a line from your pin and write in the margin to tell us more!

Accessible to Amtrak station as expansion completes



Existing church site

Kim - good in-fill near center of town (library, P.O., etc.)

Traffic Concerns

Kim
Good in-fill near other houses and main thoroughfare

Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in Empire?

Blue Pin = You agree with the proposed site or suggest a new site
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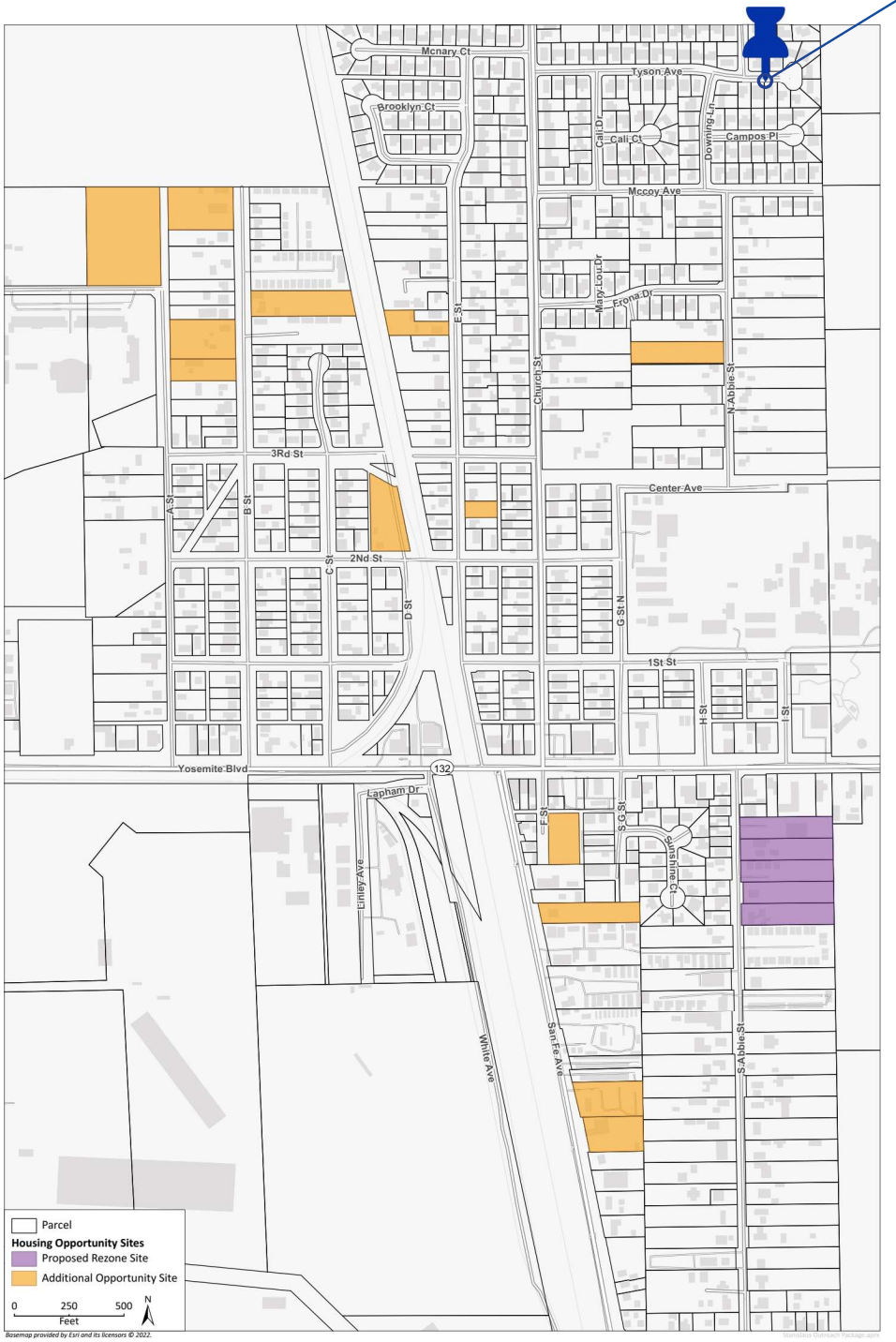
Draw a line from your pin and write in the margin to tell us more!



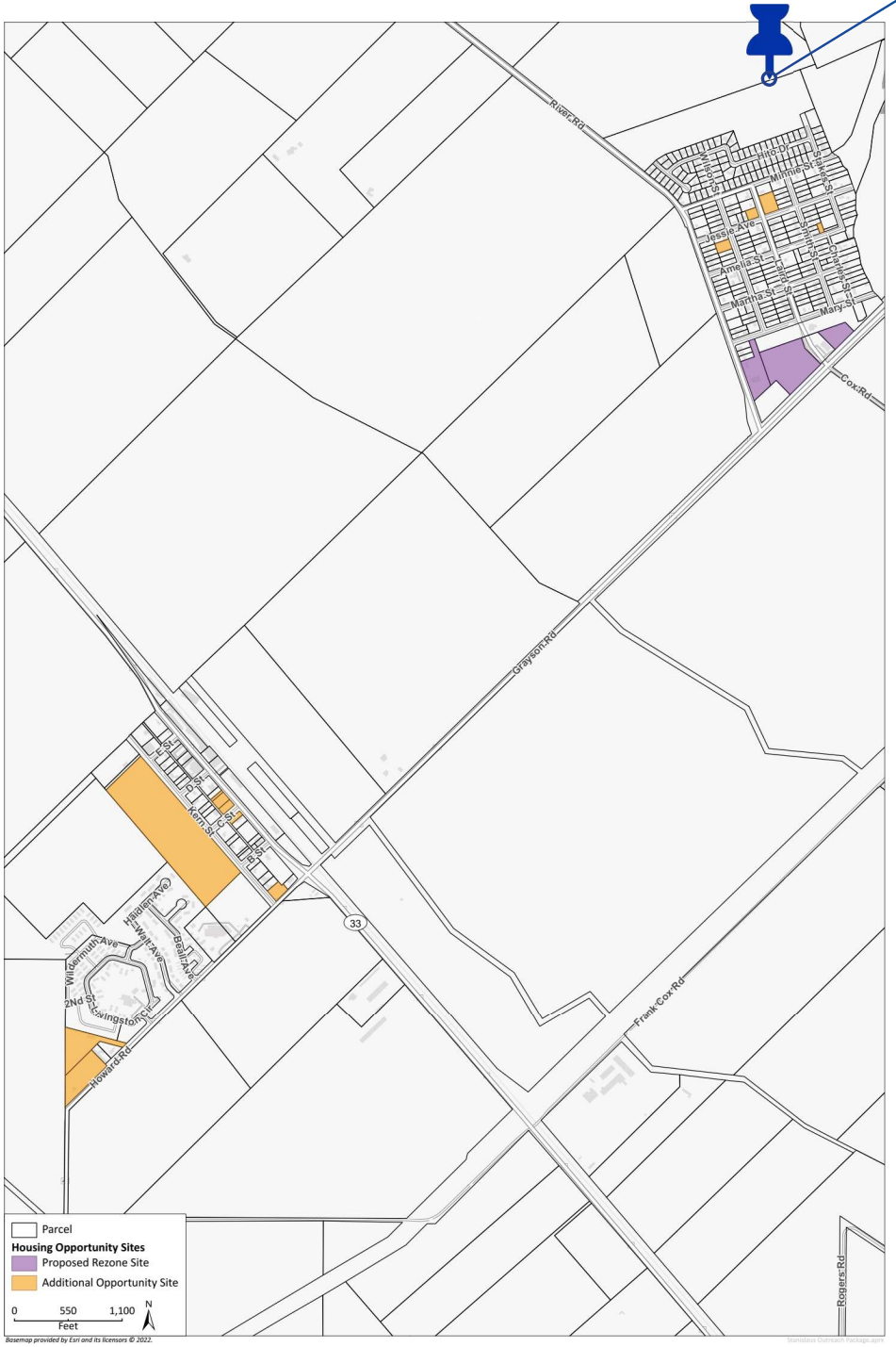
Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in Grayson and Westley?

Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in Keyes?

Blue Pin = You agree with the proposed site or suggest a new site
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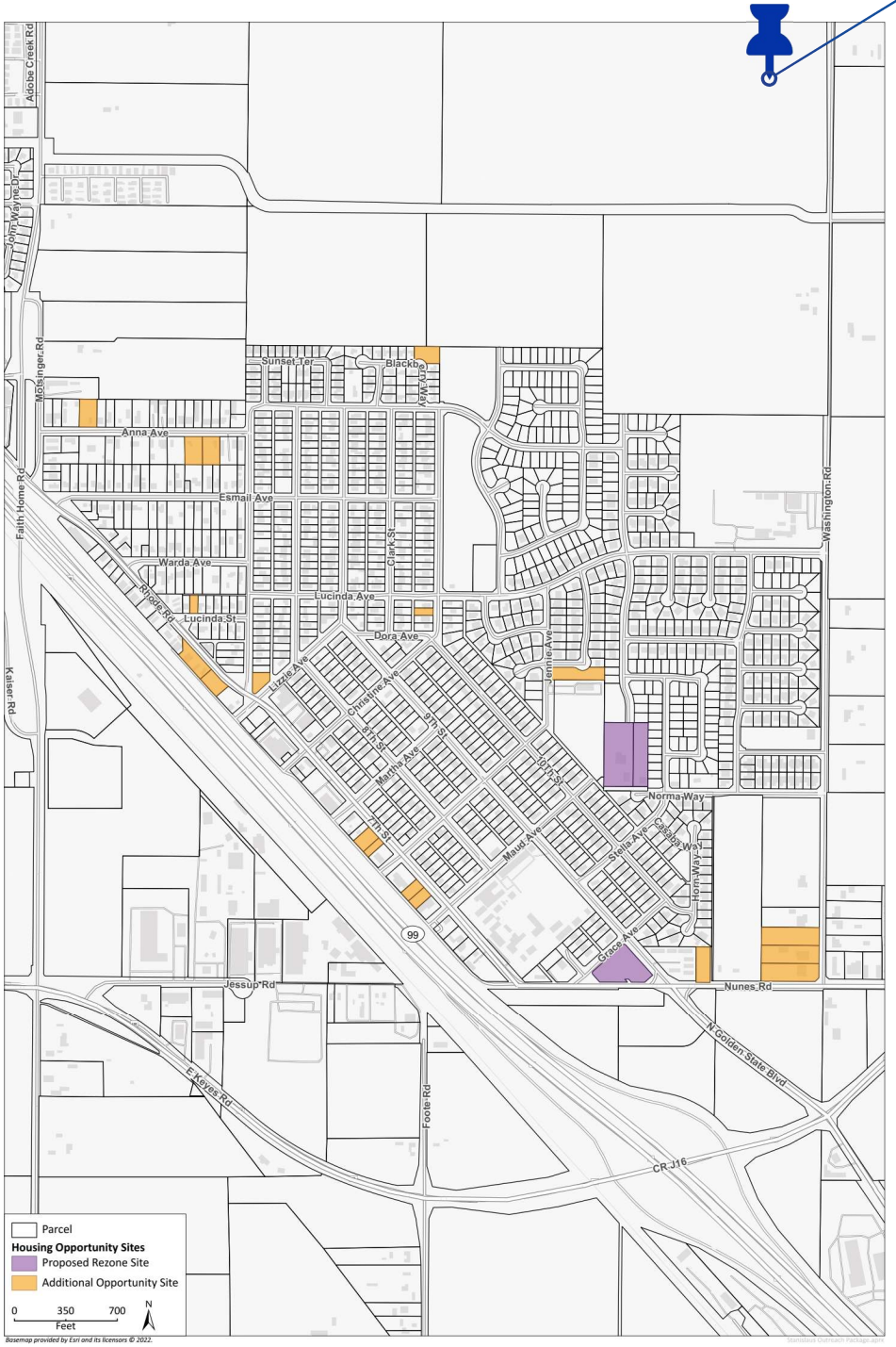

Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in Salida?

Blue Pin = You agree with the proposed site or suggest a new site
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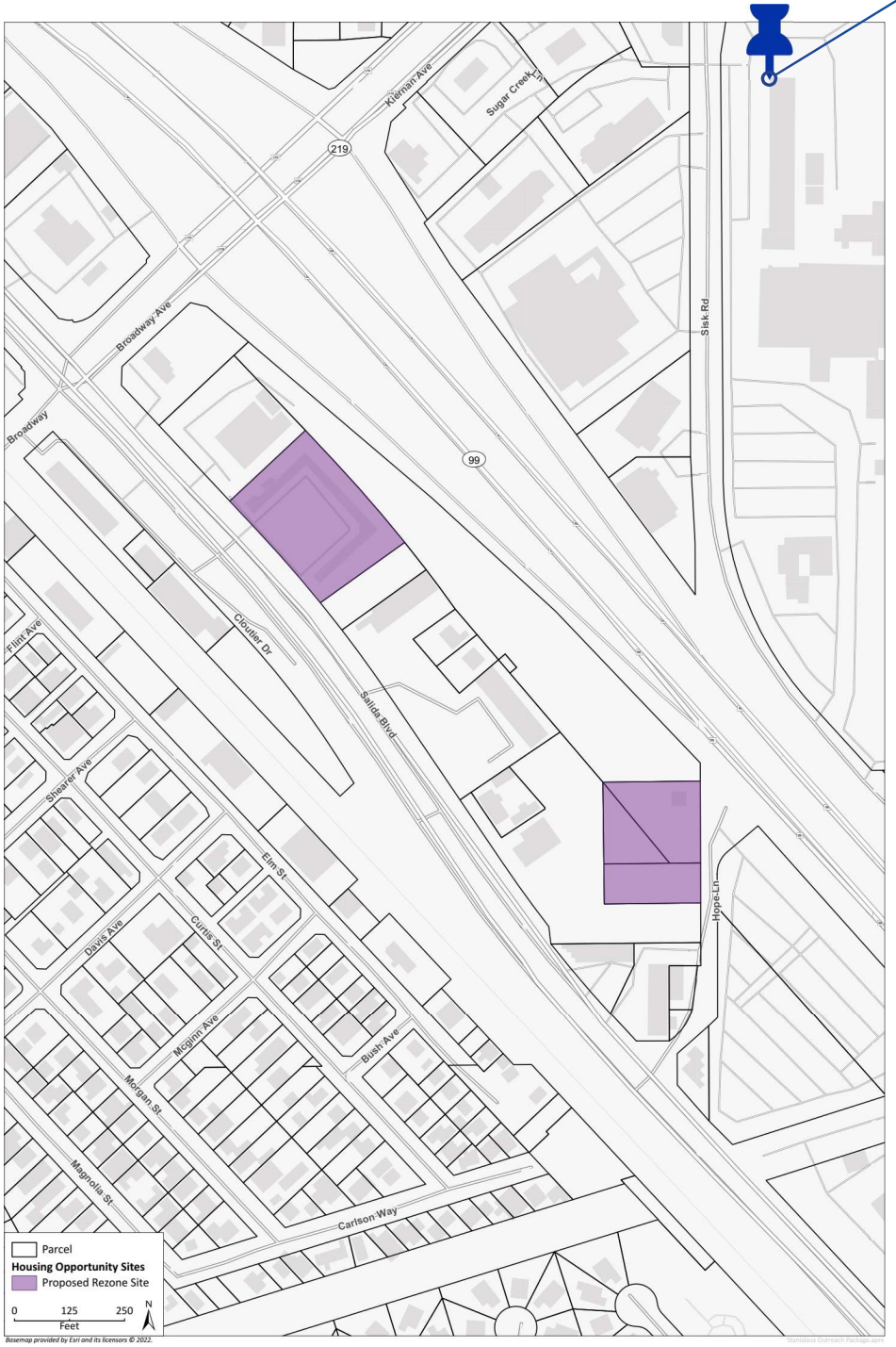
Draw a line from your pin and write in the margin to tell us more!

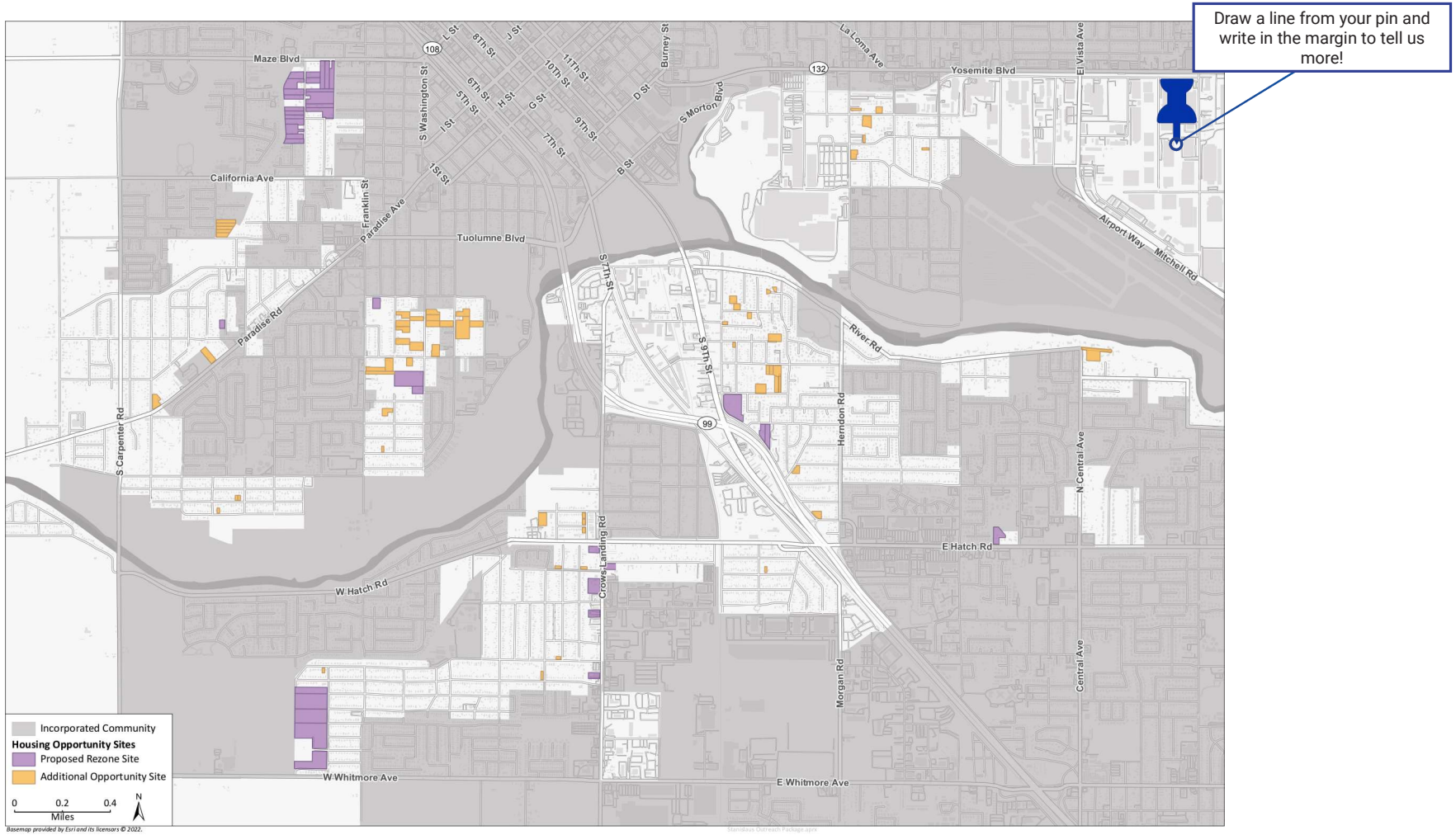


Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in Southwest Modesto?

Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site

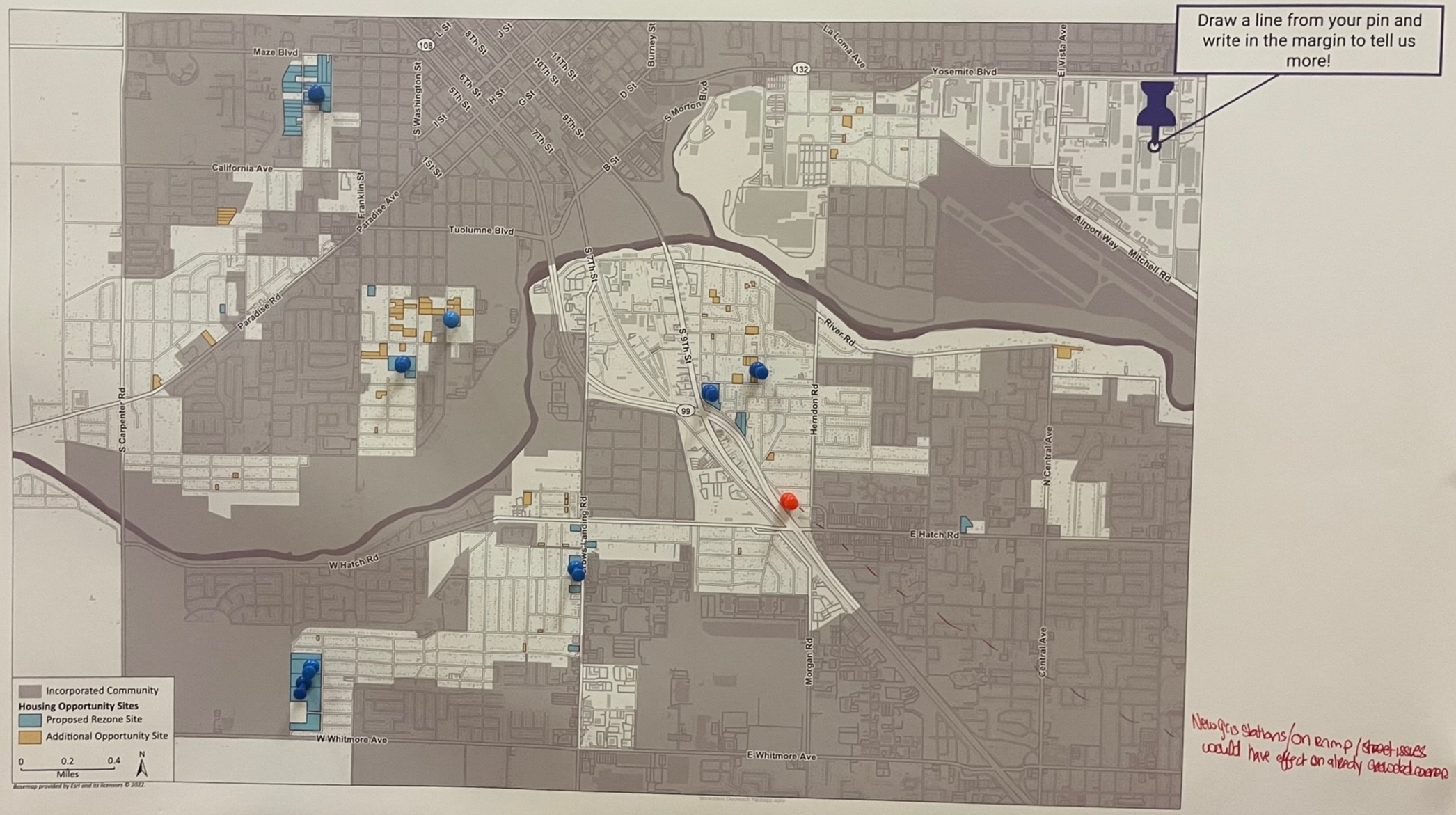


Stanislaus County

2023-2031 Housing Element Update

Where should new housing be built in the Modesto/Ceres area?

Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site



New gas stations/on ramp/street issues would have effect on already crowded corners

Climate

What resources do you use to adapt to the events listed below?
What public resources do you wish were available to help you adapt to these events?

Wildfires and Poor Air Quality

Heat Waves

Drought

Stanislaus County

2023-2031 Housing Element Update

What is Environmental Justice?

Environmental Justice is a concept focused on improving the unequal environmental burden placed on disadvantaged communities, especially minority populations.

Environmental Justice and the General Plan

Senate Bill 1000 amended Government Code Section 65302 to require that California cities and counties that have disadvantaged communities incorporate Environmental Justice policies into their general plans, either in a separate element or by integrating related goals, policies, and objectives throughout the other elements. The purpose of the law is to address the "unique or compounded health risks" in disadvantaged communities by decreasing pollution exposure, increasing community assets, and improving overall health. The Environmental Justice Element address the following themes:

Environmental Justice in Stanislaus County

Stanislaus County is in the process of developing Environmental Justice policies as part of the County's General Plan Update. The Environmental Justice Policy Framework has been developed to identify key topics that will be addressed within the County's Environmental Justice policies.

Environmental Justice Policy Framework #1

Pollution Exposure	Safe and Sanitary Homes	Food Access
• Drinking Water Quality • Pesticide Pollution • Lead Exposure from Housing • Exposures from Hazardous Waste/Solid Waste Sites	• Housing Rehabilitation Programs • Overcrowding • Cost of Housing and Rent	• Improving Food Deserts • Low-Income Food Resources • Grocery Store/Supermarket Access • Farmer's Markets and Community Gardens

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

Pollution Exposure

Safe and Sanitary Homes

Food Access

Environmental Justice Policy Framework #2

Physical Activity and Health	Public Facilities	Civic Engagement
• Asthma Rates • Cardiovascular Disease • Nutritional Education • Healthcare Facilities Access (Hospitals, Clinics, etc.)	• Expanding Bikeways and Improving Walkability • Public Transportation Improvements • Access to Parks	• Public Meeting Translation Services • Use of Technology in Engagement • Information sharing through schools, churches, and community centers

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

Physical Activity and Health

Public Facilities

Civic Engagement

Stanislaus County

2023-2031 Housing Element Update

Environmental Justice Policy Framework #1

Pollution Exposure

- Drinking Water Quality
- Pesticide Pollution
- Lead Exposure from Housing
- Exposures from Hazardous Waste/Solid Waste Sites

Safe and Sanitary Homes

- Housing Rehabilitation Programs
- Overcrowding
- Cost of Housing and Rent

Food Access

- Improving Food Deserts
- Low-Income Food Resources
- Grocery Store/Supermarket Access
- Farmer's Markets and Community Gardens

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

Pollution Exposure

✓ illegal dumping w/ neighborhoods + parks/green space + ALLEYS

✓ Factory/agriculture air impacts

Safe and Sanitary Homes

Affordable Housing

✓ grant funding for homeowner secondary housing expansion "granny flats / tiny homes"

Housing Access & Availability is an issue, particularly for Rental units. College students find it difficult to access housing they can afford.

Food Access

✓ Higher quality grocery stores w/ health focus Whole Foods fresh markets Trader Joes

Stanislaus County

2023-2031 Housing Element Update

What's Next...

Upcoming Events

Community Workshop #3

The County will be holding a third Housing Element workshop later this year to discuss the development of housing goals, policies, and programs. The workshop will allow participants to provide input on the County's action plan for meeting housing needs through 2031. Visit **www.stancounty.com/housingelement** for more information.

Future Event Schedule

Winter 2022
Public Review Draft Housing Element

Spring 2023
HCD Review & Coordination

Early 2023 - Winter 2023
Environmental Documentation

Winter 2023
Public Review and Adoption

Get Involved!

Visit the Project Website

The project website is the hub for timely updates with information on the status of the project, announcements of upcoming events, and publication of key documents.

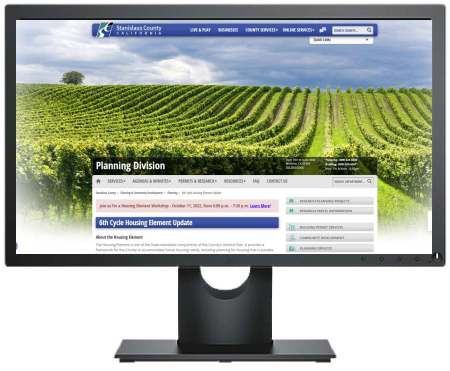
Sign-Up for Email Updates

You can join the email list on the project website. By signing up, you will be notified when the County releases new documents and announces meetings, workshops, and other events.

Join Meetings and Workshops

Not only are these great opportunities to learn about the Housing Element update, but meetings and workshops are also a great place to share your ideas and connect with the community.

Visit www.stancounty.com/housingelement for more information.



STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

Upcoming Community Workshop

Where should housing be built?

You can help answer this question and guide the future of housing in unincorporated Stanislaus County!

Community Workshop

Tuesday, October 11, 2022
6:00 - 7:30 pm

Ceres Community Center
2701 4th Street
Ceres, CA 95307

Questions?

Contact:
planning@stancounty.com
209-525-6330

Visit: stancounty.com/housingelement

STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

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planning@stancounty.com
209-525-6330

Stanislaus County is holding a community workshop to discuss the Housing Element Update, as well as the Safety and Environmental Justice Elements. The focus of the workshop is seek input on sites appropriate for the development of housing and to present information and initial findings related to the safety and environmental justice topics in the County. See you there!

Stay up to date! stancounty.com/housingelement

Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.

STANISLAUS COUNTY | 2023-2031 ACTUALIZACION DEL ELEMENTO DE VIVIENDA

Próximo Taller Comunitario

¿Dónde se deben construir viviendas?

¡Nos puede ayudar a responder esta pregunta y guiar el futuro de las viviendas en el Condado de Stanislaus!

Taller Comunitario

martes, 11 de octubre, 2022
6:00 - 7:30 pm

Ceres Community Center
2701 4th Street
Ceres, CA 95307

Visite: stancounty.com/housingelement

¿Tiene alguna pregunta?

Contactar:
planning@stancounty.com
209-525-6330

Actualización del Elemento de Vivienda del Condado de Stanislaus 2023-2031

Próximo Taller Comunitario

¿Dónde se deben construir viviendas?

¡Nos puede ayudar a responder esta pregunta y guiar el futuro de las viviendas en el Condado de Stanislaus!

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6:00 - 7:30 pm

Ceres Community Center
2701 4th Street
Ceres, CA 95307

¿Tiene alguna pregunta?

Contactar:
planning@stancounty.com
209-525-6330

El Condado de Stanislaus está programando un taller comunitario para presentar y conversar acerca de la Actualización del Elemento de Vivienda, así como los Elementos de Seguridad y Justicia Ambiental. El enfoque del taller es pedir información sobre sitios apropiados para el desarrollo de viviendas, para presentar información y hallazgos iniciales relacionados con los temas de seguridad y justicia ambiental en el Condado. ¡Espero verlo allí!

¡Manténgase al día! **stancounty.com/housingelement**

Visite el sitio web del proyecto para registrarse en nuestra lista de correo electrónico. Vuelva a consultar periódicamente los anuncios de las reuniones, los materiales de los talleres y los documentos públicos para su revisión a lo largo del proyecto.

STANISLAUS COUNTY
GENERAL PLAN UPDATE COMMITTEE

AGENDA

April 6, 2023

3:00 – 5:00 P.M.

1010 10th Street, Third Floor, Room 3135

I. COMMITTEE MEMBERS:

Supervisor Withrow; Supervisor Chiesa; Supervisor Grewal (Alternate); Commissioner Zipser; and Commissioner Durrer (Alternate).

II. DISCUSSION ITEMS:

1. 6th Cycle Housing Element Update
    a. Discussion on draft Programs and Policies
    b. Sites Inventory Update and Measure E

III. ADJOURNMENT

Next Meeting: ***TBD***

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

October 17, 2022

SUBJECT: Housing Opportunity Sites Identified for Stanislaus County Housing Element Update for Planning Period 2023-2031

Stanislaus County is currently processing an update to its General Plan Housing Element. The County's Housing Element Update is updated every eight years in accordance with state law. The County last updated its Housing Element in 2016.

The purpose of the Housing Element Update is to identify the County's existing and projected housing need and to plan for housing that would accommodate all economic segments of the population. As part of the planning process for the next eight years starting in December 2023 and through December 2031, the County has identified properties where additional multi-family housing could be built. For example, if the current zoning of an identified property allows only non-residential use or detached single family homes, the County has identified the property to receive a change of zone (rezone) from its current zoning designation. You are receiving this letter because your property has been identified as a site that could accommodate additional residential units and may be included in a rezone program. The multi-family housing types that may be allowed include triplexes, townhomes, and small apartment complexes and could be developed *only* at the discretion of the property owner.

While the County is still determining a schedule for the rezone program and the specific zoning district sites will be rezoned to, the properties identified in the housing element will be part of a housing sites inventory that will be reported to the California Department of Housing and Community Development by Winter 2023.

Although your property has been identified as part of a rezone program, it does not require the property owner to construct housing units. The zoning simply allows the property owner the opportunity to add residential units. You are encouraged to learn more at the Housing Element website and make additional comment. An online housing opportunity public comment tool is currently available at the following web addresses: https://arcg.is/1jL8zP for the English version and https://arcg.is/u8zuu for a Spanish version. Comments will be accepted via the online GIS tool until October 31, 2022. Comments submitted after this date can be submitted to planning@stancounty.com.

Please feel free to email me at doudk@stancounty.com or call (209) 525-6330 if you would like more information or have any questions. Additionally, please visit the Housing Element website at www.stancounty.org/housingelement to learn more about the Housing Element schedule and process.

Sincerely,

Kristy Doud, Deputy Director
Planning Division

Stanislaus County

2023-2031 Housing Element Update

October 2022

Community Workshop #2

Site Inventory Map Packet

Thank you for attending the Stanislaus County's Community Workshop for the 2023-2031 Housing Element Update on October 11, 2022! This packet contains maps of the nine unincorporated areas of Stanislaus County and the proposed housing opportunity sites to accommodate the County's Regional Housing Needs Allocation (RHNA).

We ask you to review the maps on the following pages and provide your feedback. You can access the mapping exercise online at www.stancounty.com/housingelement.

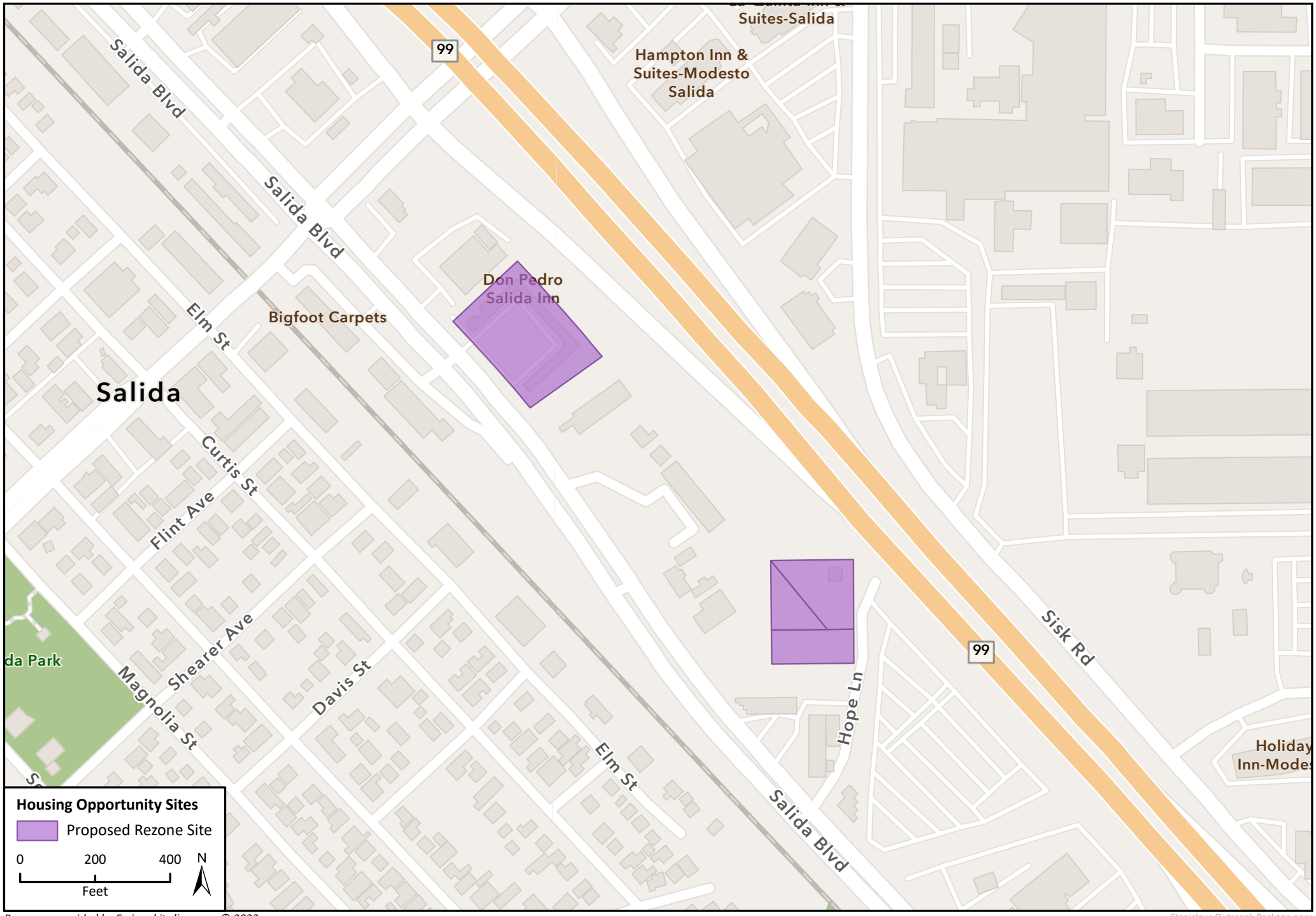
Visit the Project website at https://stancounty.com/housingelement

Complete the online mapping exercise: English | Spanish

Contents

Salida 1
Del Rio 2
Empire 3
Southwest Modesto 4
Keyes 5
Denair 6
Grayson & Westley 7
Diablo Grande 8
Hickman 9

Proposed Housing Sites in Salida



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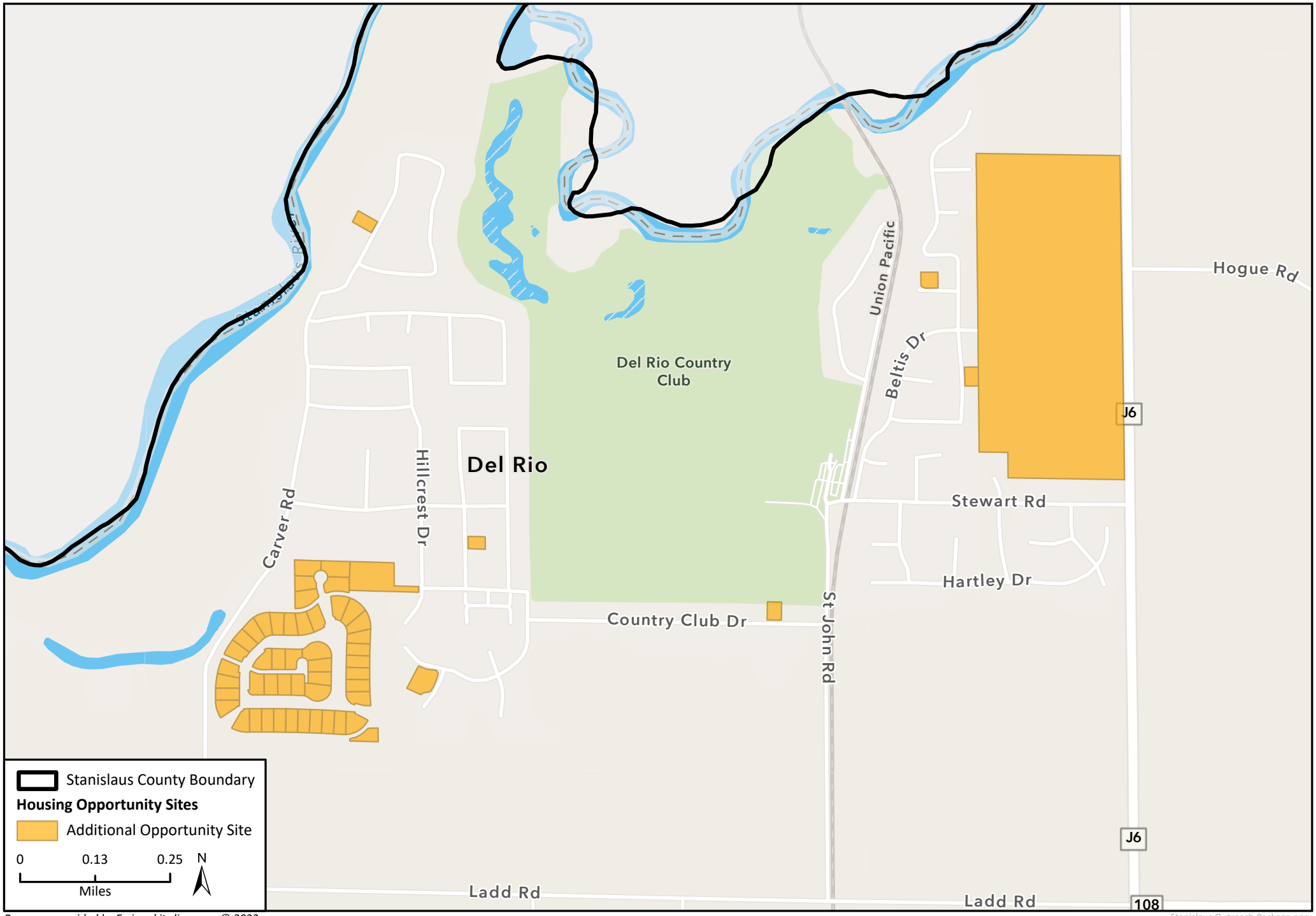
Stanislaus Outreach Package.aprx
Fig 1 Salida

Proposed Housing Sites in Del Rio



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Proposed Housing Sites in Empire

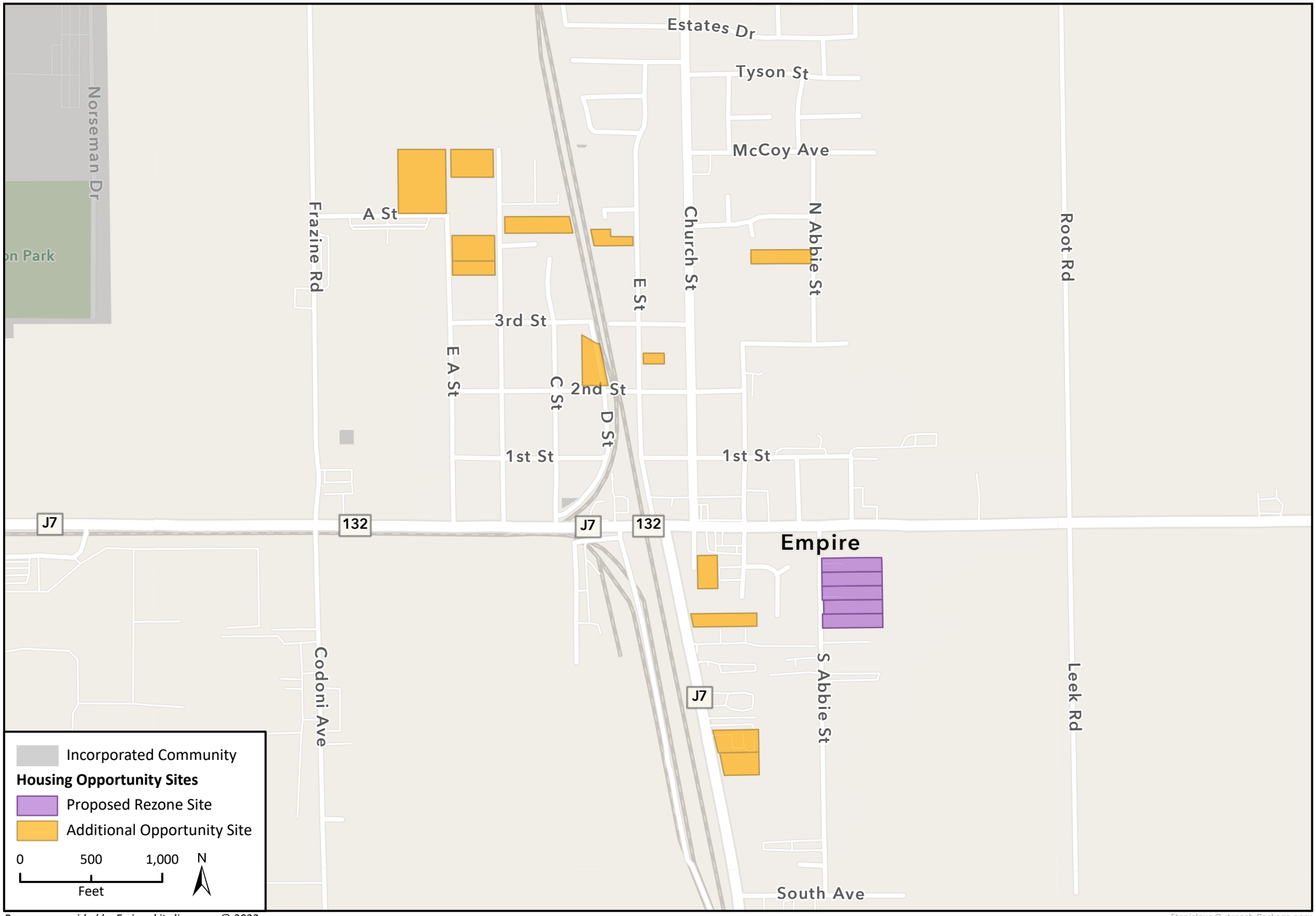

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Fig 3 Empire

Proposed Housing Sites in Southwest Modesto

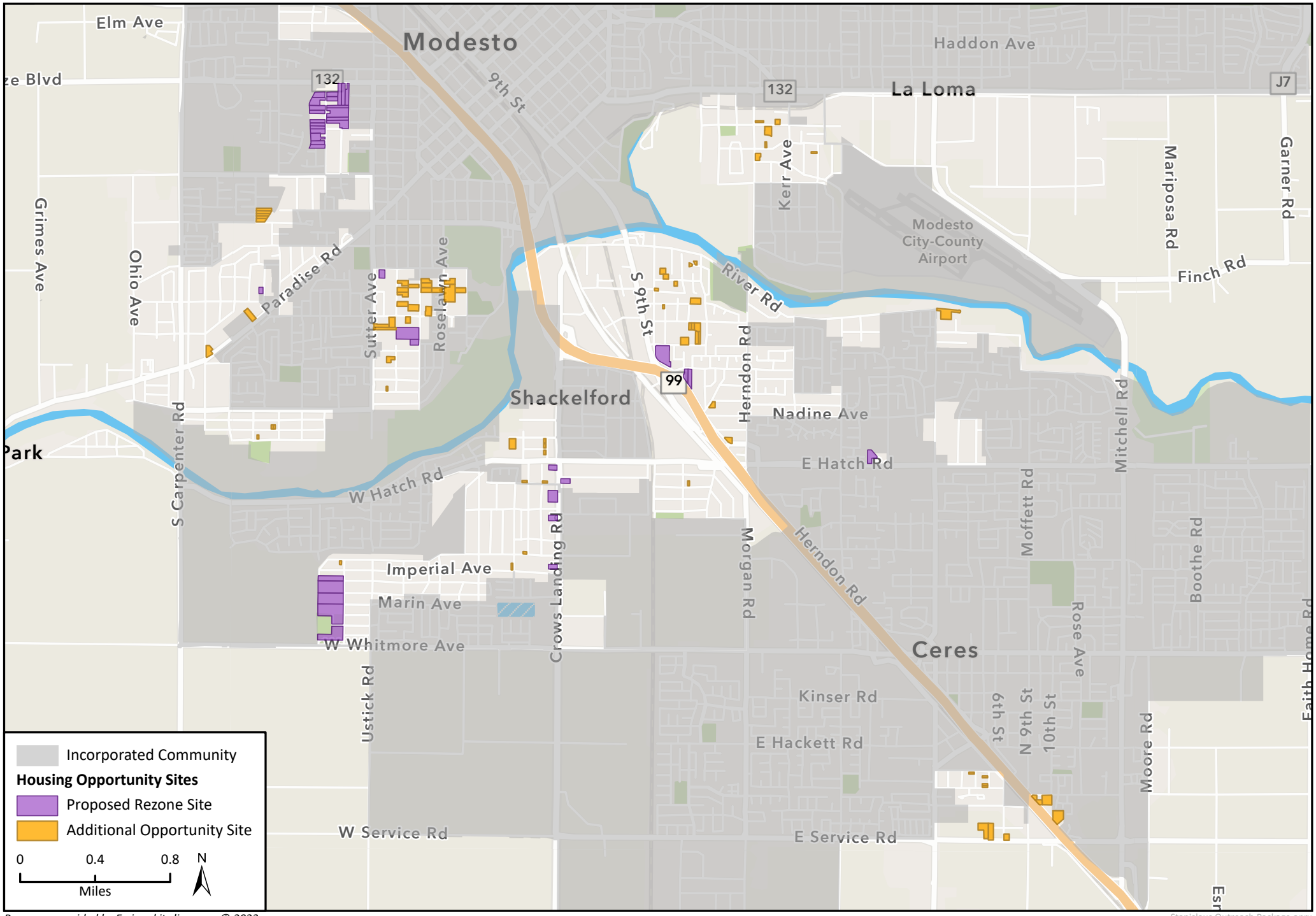

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Fig 4 Southwest Modesto

Proposed Housing Sites in Keyes

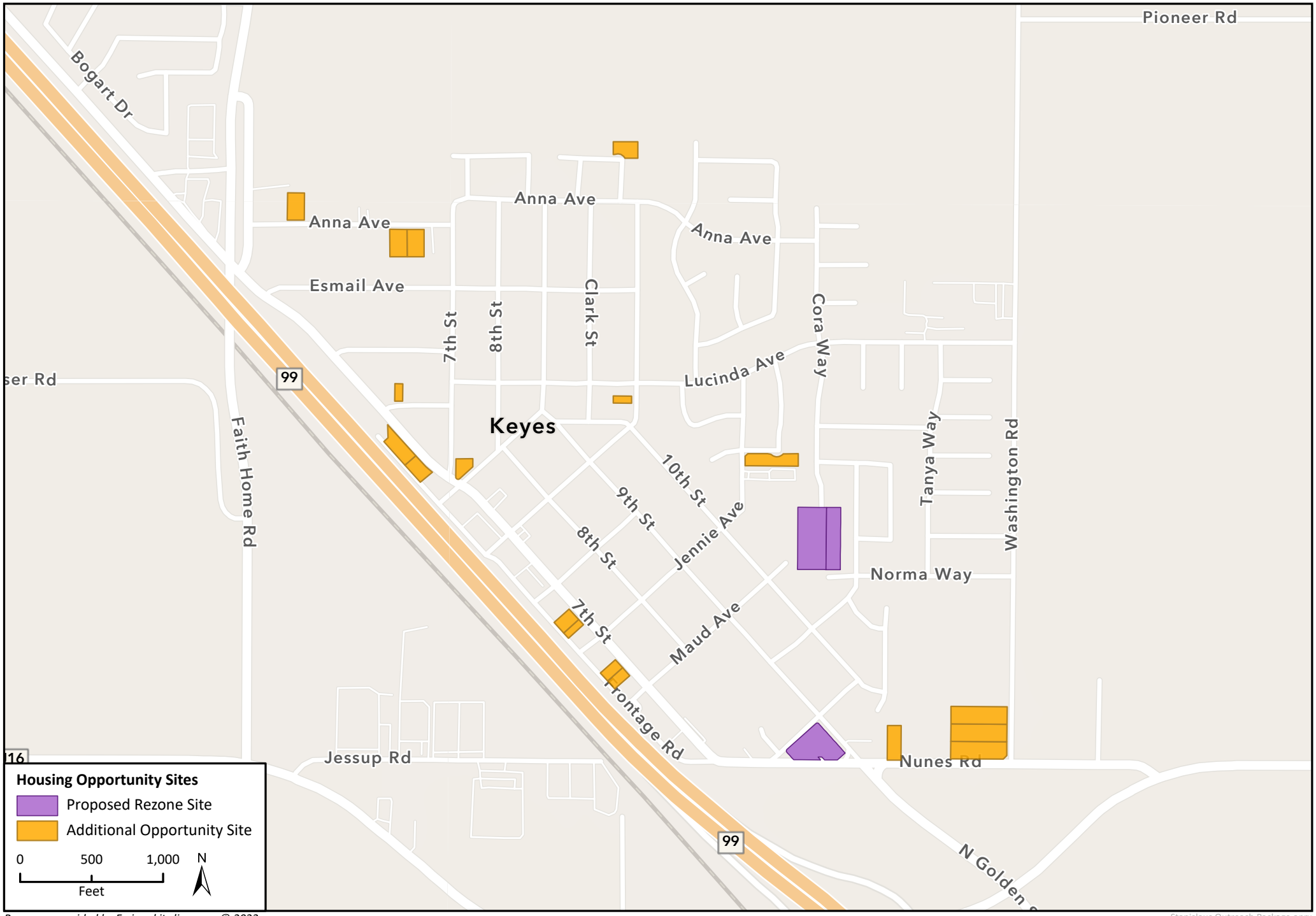

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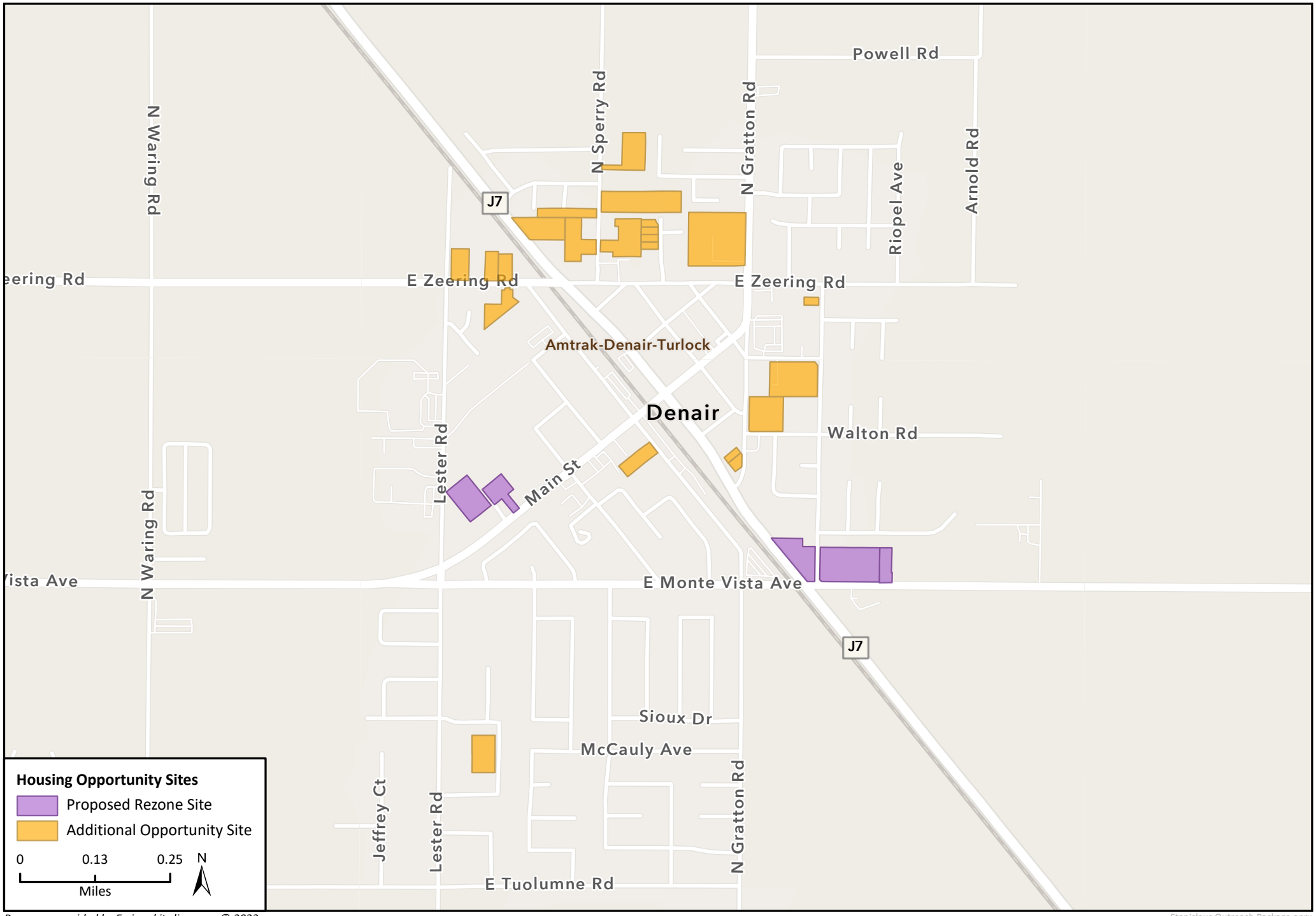
Fig 5 Keyes

Proposed Housing Sites in Denair



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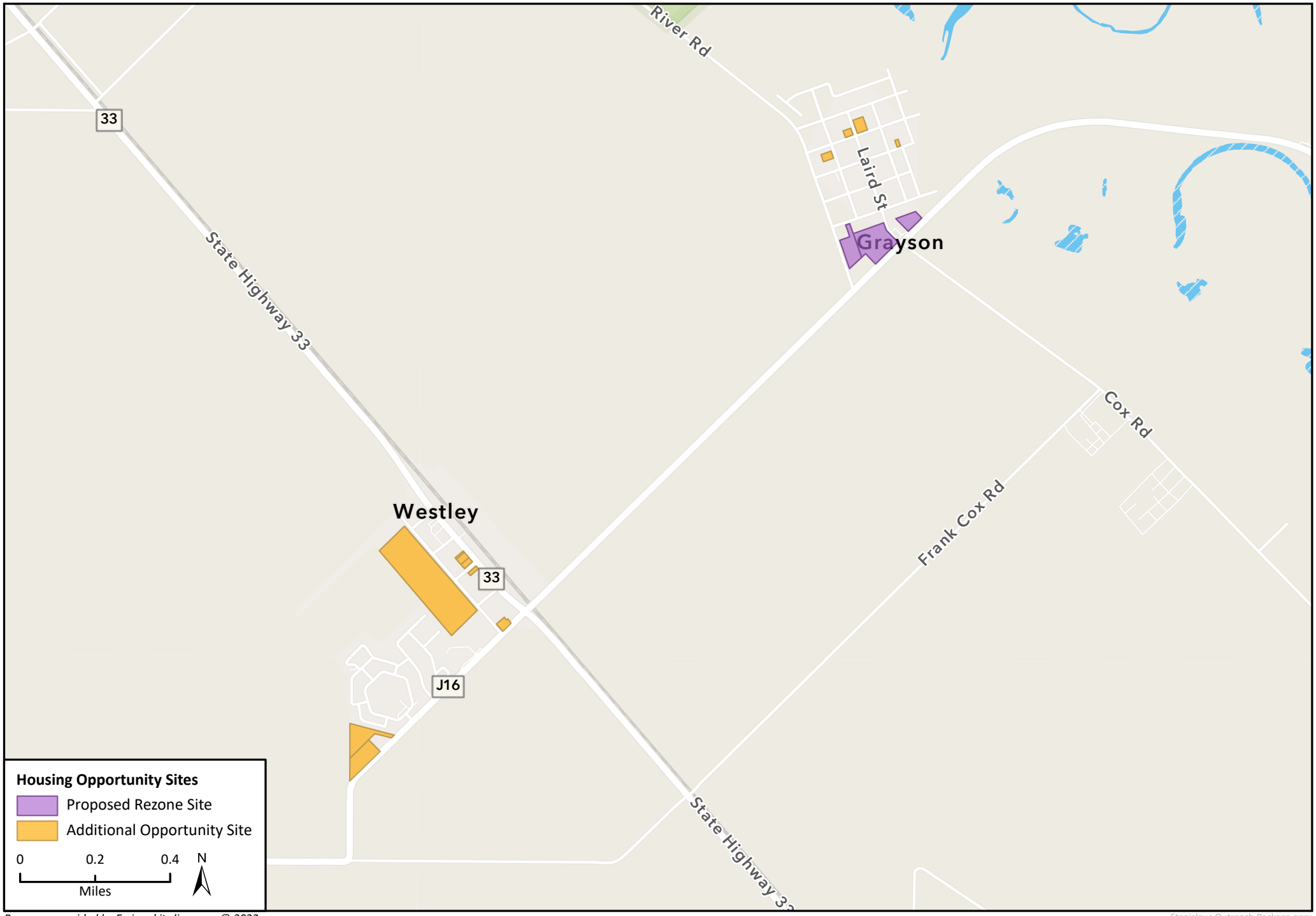
Proposed Housing Sites in Grayson & Westley



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Proposed Housing Sites in Diablo Grande

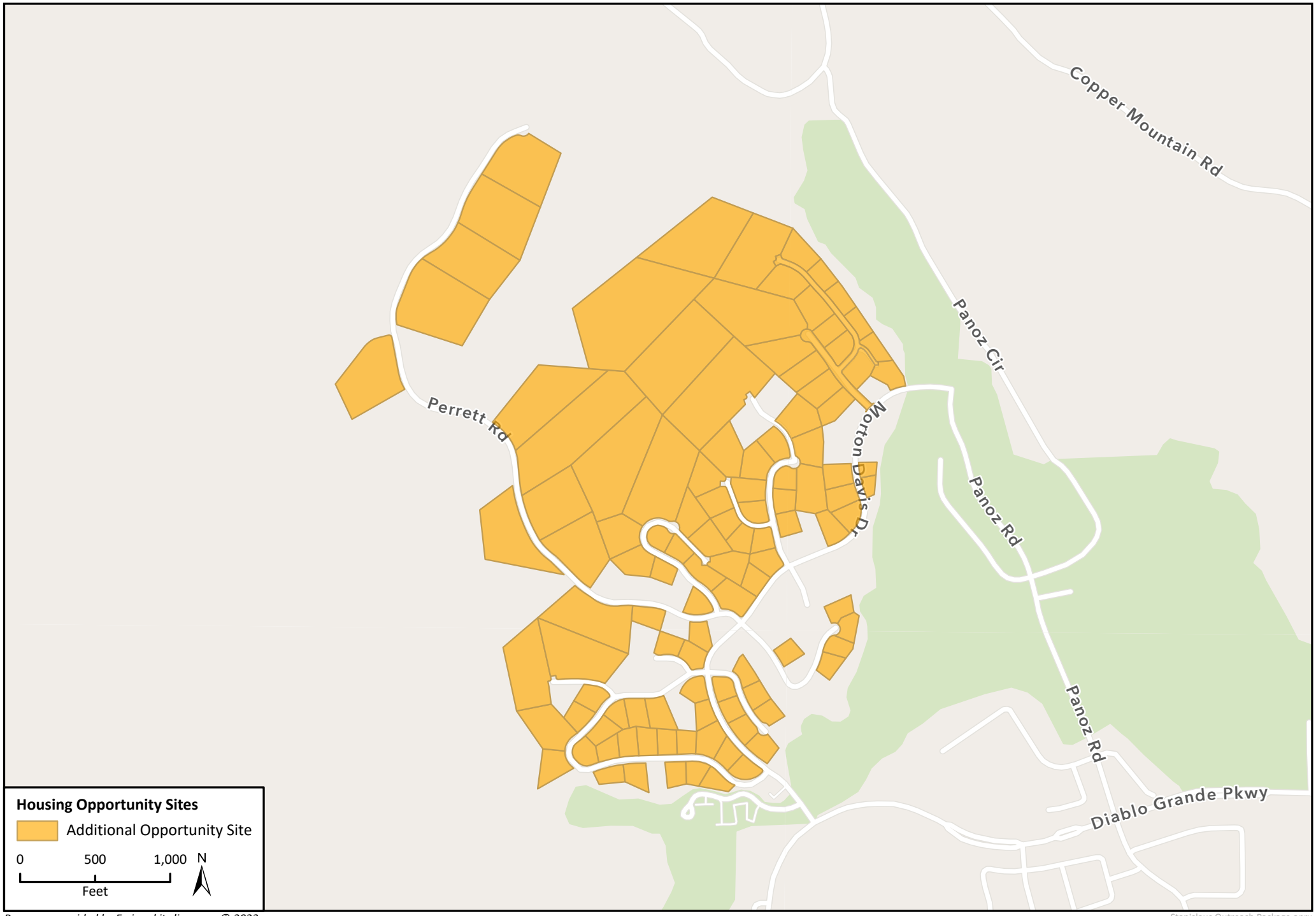

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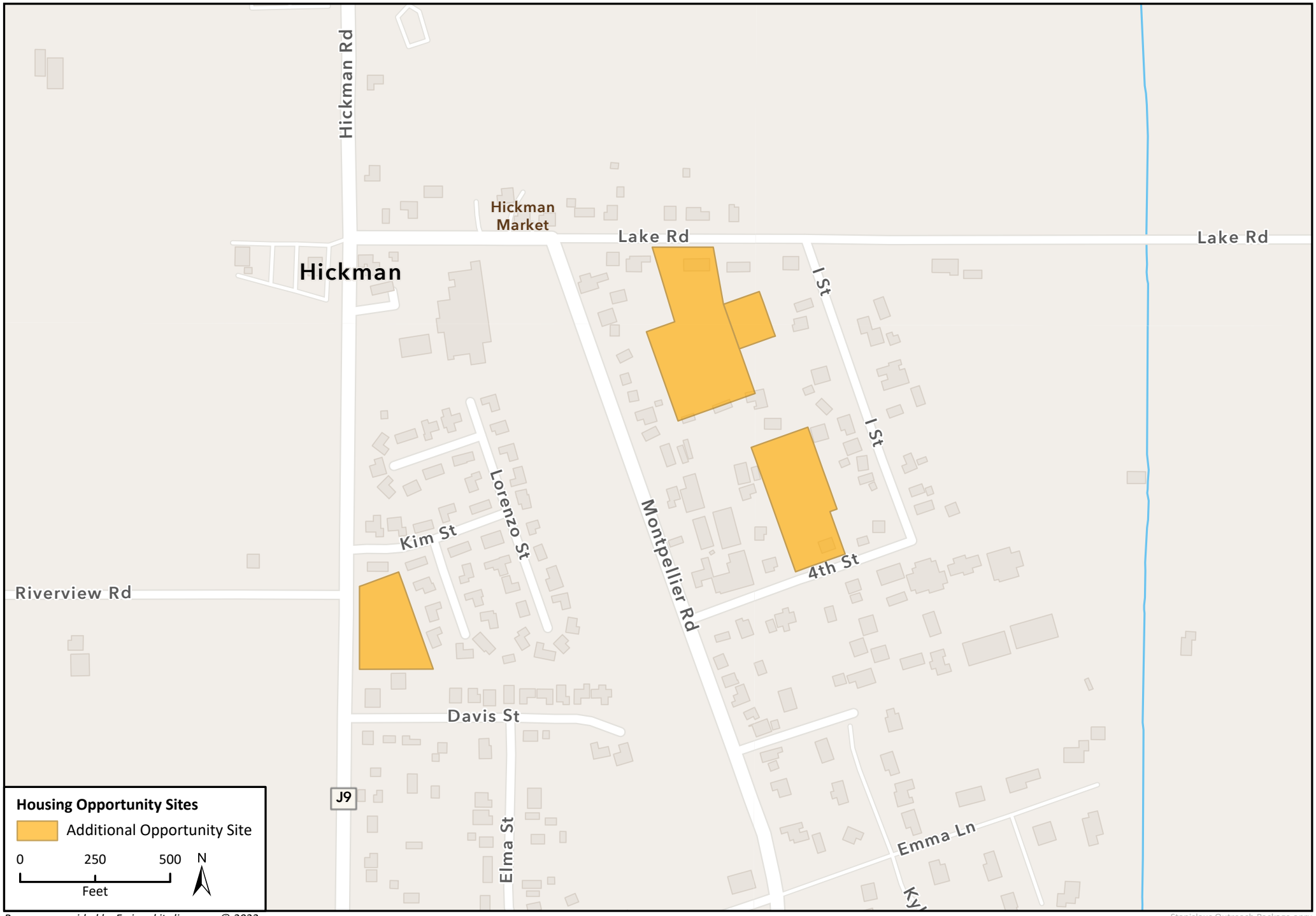
Fig 8 Diablo Grande

Proposed Housing Sites in Hickman



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Stanislaus Outreach Package.aprx
Fig 9 Hickman

From: Kristin Doud

To: smadison@stancoahc.com; gbarry@4leafinc.com; bjmadzier@verizon.net; adgi@att.net; dhufford@amarok.com; jim@assoceng.com; ben.millerdesign@yahoo.com; rmummert@bmeng.net; bhcommercial@gmail.com; avaldez@bright-homes.com; johnb@biagv.org; ray@homes.direct; timberryandassoc@sbcglobal.net; coestreich@coldstoragemfg.com; swellnitz@commercialarch.com; togrewal@gmail.com; dfengineering@dfengineering.com; dennis@dlsmithdesignstudio.com; edmond@etjarchitect.com; evan.zeff@gmail.com; max@gdrengr.com; nprichard@gkengineers.com; cstark@sungaterealty.com; rhawkins@hawkins-eng.com; surfsupdw@yahoo.com; tom@huffcon.com; john@jbandersonplanning.com; justin@jksdesigninc.com; justin.capp@justinwcapp.com; craig@lewiscapadvisors.com; janice.yee@lionakis.com; info@mcreng.com; jmann@mve.net; mike@mseng.comcastbiz.net; edmond@moradengineering.com; bill@morris-eng.com; info@muirconsulting.com; mike@navarroarc.com; dave@newman-romano.com; PHurban@nseng.net; info@odellengineering.com; nick@peltonwylie.com; george@petrulakis.com; modesto@ppeng.com; landon.blake@redefinedhorizons.com; dan@redwoodparkproperties.com; ronwest.associates@gmail.com; kgenasci@siegfriedeng.com; david@skwassociates.com; sam-david@att.net; richardtodddeponte@gmail.com; Donald.Phillips@teterae.com; rthompson@thompsonarchitecture.com; Gabriel@torrereichconstruction.com; Torre@torrereichconstruction.com; twschwartz55@yahoo.com; kenyang@vice-engr.com; nstammer@vvhce.com; mike@wardalaw.com; gmadsen@weltyeng.com; arcnorm@pacbell.net

Cc: Emily Basnight; Angela Freitas

Subject: Sites Inventory for the Stanislaus County 6th Cycle Housing Element Update

Date: Wednesday, October 12, 2022 5:17:00 PM

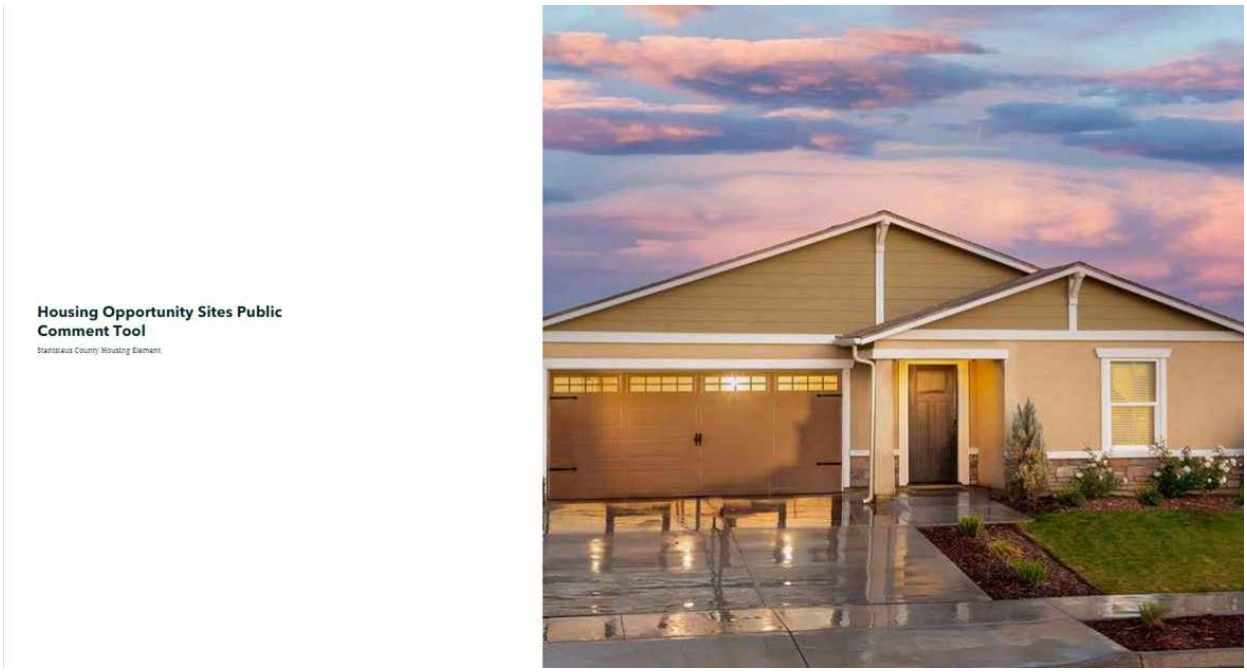
Attachments: image003.png

Stanislaus County has developed an online mapping tool to give an opportunity to the public to provide input on the proposed sites inventory for Stanislaus County's 6th Cycle Housing Element Update. The tool is available in English or Spanish at the following website: https://www.stancounty.com/planning/pl/housing-element.shtm . There is a short tutorial video explaining how to use the mapping tool. The mapping tool will be available for public input until 10/31/2022.

For more information about Stanislaus County's 6th Cycle Housing Element Update please visit https://www.stancounty.com/planning/pl/housing-element.shtm or email planning@stancounty.com .

El Condado de Stanislaus ha desarrollado una mapa en línea como herramienta para que el público tenga la oportunidad de ofrecer su opinión sobre el inventario de sitios propuestos para la Actualización del Elemento de Vivienda del 6to Ciclo del Condado de Stanislaus. Esta herramienta está disponible en inglés o español en el siguiente sitio web: https://www.stancounty.com/planning/pl/housing-element.shtm . Hay un breve video que explica cómo usar el mapa en línea. Esta herramienta estará disponible para el público hasta el 31 de octubre, 2022.

Para obtener más información acerca de la Actualización del 6to Ciclo del Elemento de Vivienda del Condado de Stanislaus, visite la página web: https://www.stancounty.com/planning/pl/housing-element.shtm o por correo electrónico: planning@stancounty.com .



Kristy Doud
Deputy Director
Stanislaus County Planning and Community Development Department

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(209) 525-6330
1010 10th Street Suite 3400
Modesto, CA 95354

Stanislaus County

6th Cycle Housing Element Update

Community Workshop #1

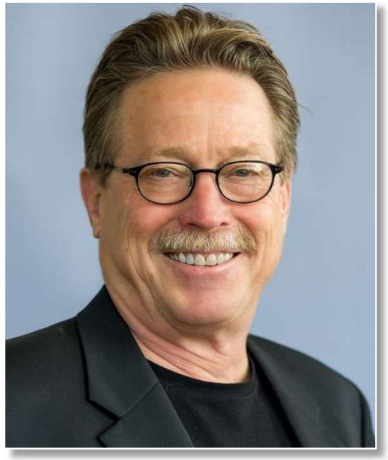
June 23, 2022 – 6:00 PM

Source: Stanislaus County Affordable Housing Corporation

Introductions

Nikki Streegan
Senior Planner

Saara Chaudry
Associate Planner



Jim Harnish, JD
Principal/Owner

Ryan Lester
Associate Planner

rincon Rincon Consultants, Inc.

mintierharnish
Planning Tomorrow Today®

Stanislaus County

Teaming Partners

valley vision
Community Inspired Solutions

Rincon Consultants, Inc.

mintierharnish
Planning Tomorrow Today

FEHR PEERS

Stanislaus County

Presentation Outline

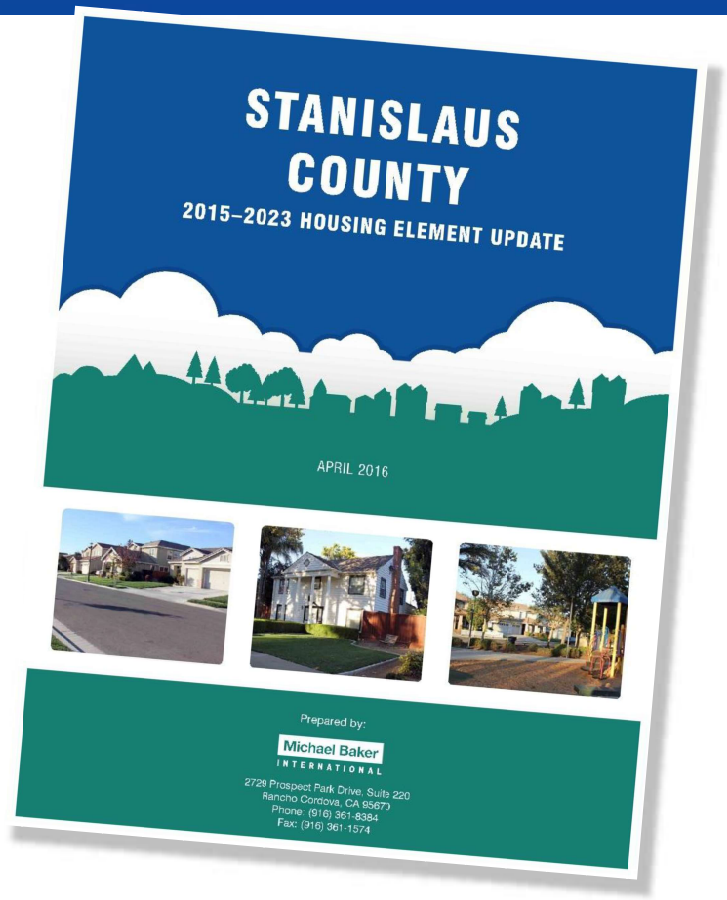
- Housing Element Basics
- Regional Housing Needs Allocation
- Safety Element
- Environmental Justice
- Schedule and Engagement

Housing Element Overview

Source: Stanislaus County Affordable Housing Corporation

What is a Housing Element?

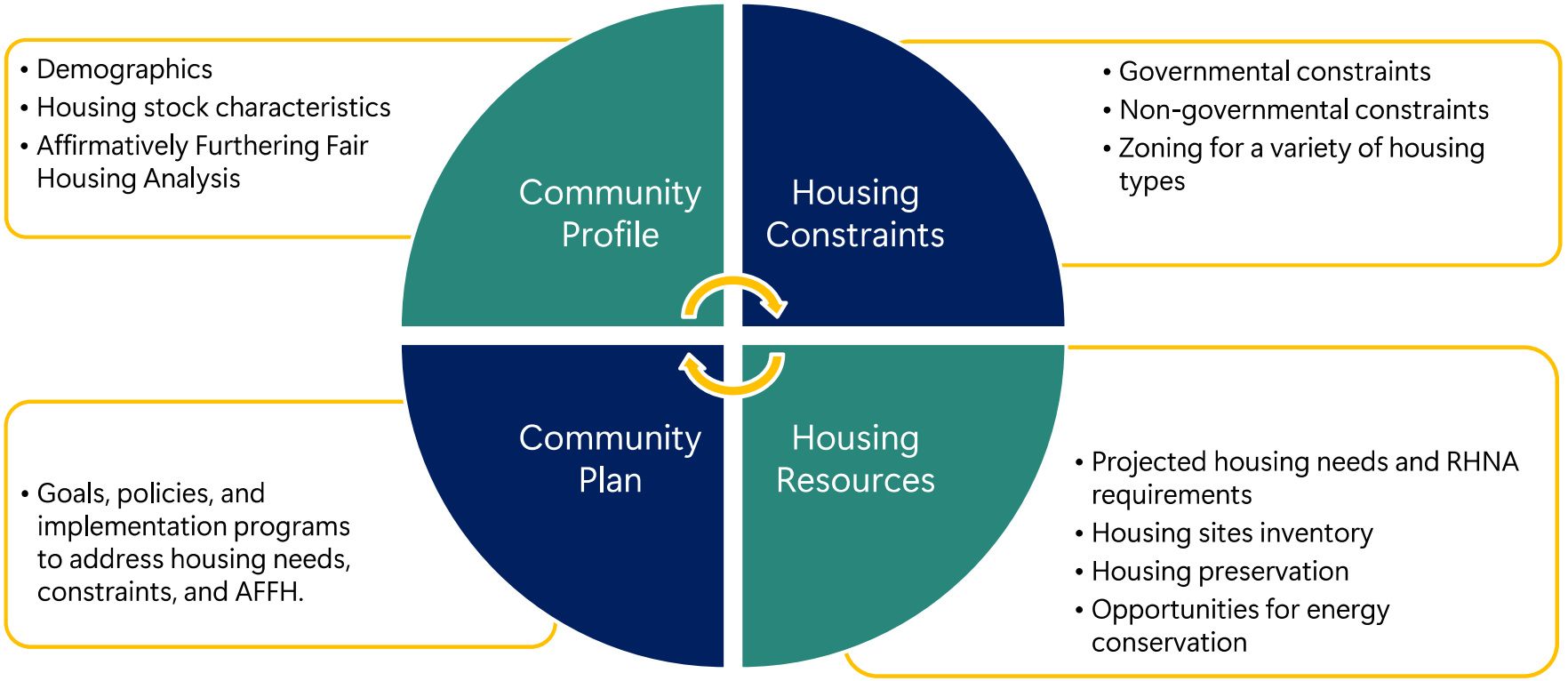
- One of eight elements in the County General Plan
- Housing Element updates required by State law in eight year "cycles."
- Currently preparing the 6th cycle Housing Element update
- Updates done on a schedule prescribed by the State (adoption deadline December 31, 2023)



What does a Housing Element do?

- Provides an assessment of both current and future housing needs
- Identifies opportunities and constraints on housing production
- Establishes goals, policies, and programs to meet housing needs
- Updates County practices and regulations to reflect new State laws

Housing Element Basics



Housing Element Basics

Housing Element identifies strategies and programs that focus on:

- Conserving and improving existing affordable housing
- Maximizing housing opportunities throughout the community
- Assisting in the provision of affordable housing
- Removing governmental and other constraints to housing investment
- Promoting fair and equal housing opportunities

Relevant Legislation

- Affordable Housing Streamlined Approval Process: SB 35 (2017)
- Additional Housing Element Sites Analysis Requirements: AB 879 (2017), AB 1397 (2017)
- Affirmatively Furthering Fair Housing: AB 686 (2017)
- No-Net-Loss Zoning: SB 166 (2017)
- Safety Element Update to Address Adaptation and Resiliency: SB 1035 (2018)
- By-Right Transitional and Permanent Supportive Housing: AB 2162 (2018), AB 101 (2019)

Relevant Legislation

- Accessory Dwelling Units: AB 2299 (2016), SB 1069 (2016), AB 494 (2017), SB 229 (2019), SB 13 (2019), AB 670 (2019), AB 671 (2019)
- Density Bonus: AB 1763 (2019)
- Housing Crisis Act of 2019: SB 330 (2019)
- Surplus Land Act Amendments: AB 1486 (2019), AB 1255 (2019)
- Housing Impact Fee Data: AB 1483 (2019)
- Emergency and Transitional Housing Act of 2019: AB 139 (2019)
- Standardization of Sites Inventory Analysis and Reporting: SB 6 (2019)
- Evacuation Routes: SB 99 (2019), AB 747 (2019)

What happens if the County doesn't update the Housing Element?

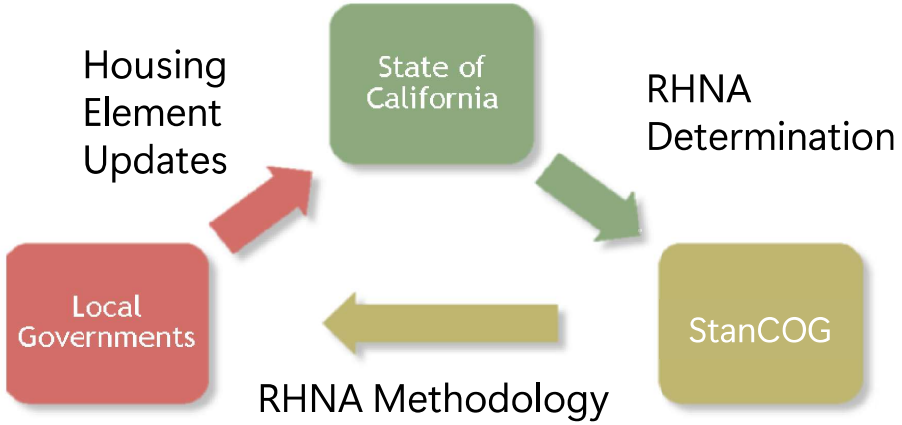
- Out of compliance with State Law
- The General Plan could be deemed inadequate and therefore invalid
- A noncompliant or invalid General Plan creates the potential for the County to be sued when making land use decisions
- The County would be ineligible for several Federal and State housing, community development and infrastructure funding and grant programs

Regional Housing Needs Allocation (RHNA)

Source: Stanislaus County Affordable Housing Corporation

What is RHNA?

- The representation of the future housing needs for all income levels in the County for the next eight years
- Prepared by Stanislaus Council of Governments (StanCOG)
- 6th cycle: December 15, 2023 – December 15, 2031



StanCOG RHNA Distribution

StanCOG
Stanislaus Council of Governments
2023-2031 RHNA = 34,344 housing units

Waterford 557	**Ceres 3,361**	**Modesto 11,248**	**Unincorporated County 2,475**	**Turlock 5,802**	**Oakdale 1,665**	**Newman 1,048**
		Patterson 3,716	**Riverbank 3,591**	**Hughson 881**		

Each jurisdiction must accommodate its "fair share" of the regional housing need.

RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low	Low			
574	398	458	1,045	2,475

Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**

RHNA Change Since Last Housing Element Update

Cycle	Lower		Moderate	Above Moderate	Total RHNA
	Very Low	Low			
5th Cycle	538	345	391	967	2,241
6th Cycle	574	398	458	1,045	2,475
Change	+36	+53	+67	+78	+234

Cycle	Lower		Moderate	Above Moderate
	Very Low	Low		
5th Cycle	24.0%	15.4%	17.4%	43.2%
6th Cycle	23.2%	16.1%	18.5%	42.2%

Source: The Board of Supervisors of the County of Stanislaus Board Action Summary, Resolution No. 2020-0169, Board Agenda Item 6.D.1 (April 21, 2020), StanCOG Proposed RHNA Methodology Framework, Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.

Stanislaus County Housing Need Requirement

RHNA for Unincorporated Stanislaus County by Income Category, 2023-2031 and Ability to Pay for Housing Based on HCD Income Limits, Stanislaus County, 2022

Income Category	RHNA (Housing Units)	Estimated Income (Four Person Household)	Maximum Affordable Monthly Rent
Extremely Low Income (<30% of Median Income)	287	< $18,850	$471
Very Low Income (30-50% of Median Income)	287	$31,450	$786
Low Income (50-80% of Median Income)	398	$50,300	$1,258
Moderate Income (80-120% of Median Income)	458	$62,850	$1,571
Above Moderate Income (>120% of Median Income)	1,045	> $74,450	$2,201
TOTAL	**2,475**	--	--

Source: StanCOG Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.

Housing Element Discussion

Source: Stanislaus County Affordable Housing Corporation

Questions

- What members of the community are most in need of housing and services?
- What are the unmet housing needs in Stanislaus County?
- What are the barriers to affordable housing in Stanislaus County?
- What can the County and community leaders do to address these needs and barriers?

General Project Schedule

WE ARE HERE

Milestones	Estimated Date
Workshop #1: Housing, Safety, and EJ	**June 23, 2023**
Planning Commission Study Session	July 2022
Workshops #2 and #3	Summer/Fall 2022
Public Review Draft Housing Element	January 2023
HCD Review of Draft Housing Element	April-June 2023
Planning Commission Hearings	Oct/Nov 2023
Board of Supervisors Hearings	Nov/Dec 2023
Submit to HCD for Certification	December 2023

Community Engagement Events

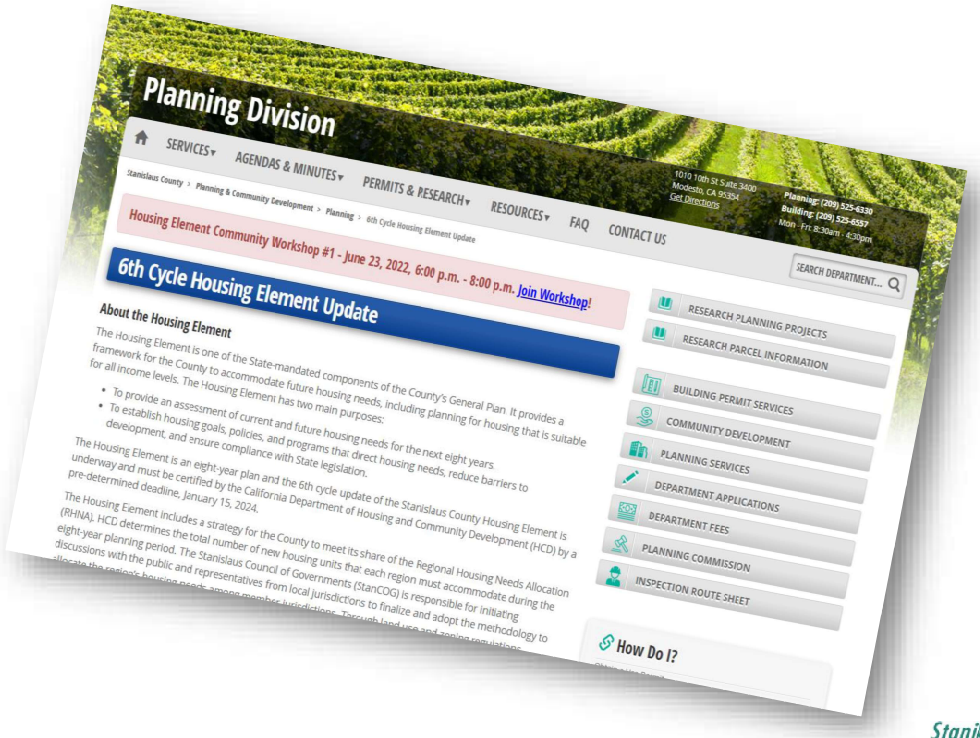
- Three Community Workshops
- Two Study Sessions
  - Planning Commission (1)
  - General Plan Update Committee (1)
- Four Public Hearings
  - Planning Commission (2)
  - Board of Supervisors (2)

Community Workshops

Workshop 1	▪ Housing Element Overview ▪ Project Overview & Discussion *Today!*
Workshop 2	▪ Sites Inventory Analysis ▪ Feedback on Environmental Justice & Safety Elements
Workshop 3	▪ Preliminary Housing Element Goals, Policies, and Programs ▪ Review Environmental Justice & Safety Elements

Public Information and Participation

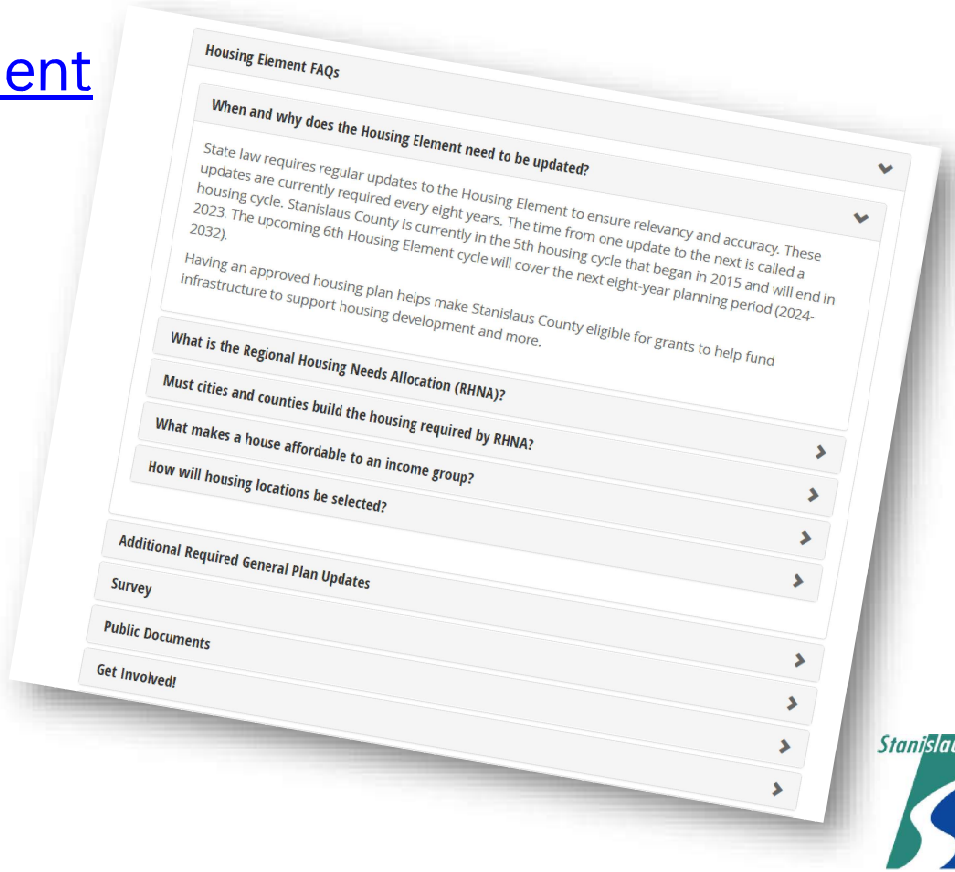
- Website
- E-mail Blasts
- Social Media
- Stakeholder Interviews
- Bilingual Online Survey
- Spanish Translation Services



Website

www.stancounty.com/housingelement

- Up-to-date information
- Meeting and workshop calendar
- FAQs
- Public documents
- Email sign-up



Stanislaus County

6th Cycle Housing Element Update

General Plan Update Committee Presentation

July 7, 2022 – 3:00 PM

Source: Stanislaus County Affordable Housing Corporation

Community Workshop #1 Highlights

Housing and Safety:

- Needs include housing for **homeless/transitional, affordable for seniors, foster youth**, in proximity to **transit and resources**.
- Emphasis on **infill opportunities** rather than outward growth.
- Safety Element should **involve OES** among stakeholders.
- Natural disasters and **climate change** have a greater impact on **low-income households**.
- More **green infrastructure** is needed.

Community Workshop #1 Highlights

Environmental Justice:

- **Pollution concerns**: smog from vehicles, air quality, water quality.
- **Facilities**: parks are accessible, but no restrooms. The unincorporated *islands* lack resources.
- **Healthy food access**: other modes of transportation to grocery stores are needed, most travel to stores by car.
- **Physical activity**: need bike and walking paths, dedicated bike lanes.

Sites Inventory

Source: New Home Construction by Great Valley Center (Flickr, CC 2.0)

Sites Inventory

6th Cycle Criteria:

- Sites likely to redevelop or develop in next 8 years:
  - Vacant
  - Owner/developer interest
  - Low improvement to land value ratio
  - Low FAR if non-vacant
- Standards for lower income sites:
  - 0.5 and 10 acres in size
  - Allow at least 20 dwelling units/acre
  - Large enough to accommodate at least 16 units
  - Infrastructure-ready
  - Access to jobs, transit, and services

Sites Inventory

Units Needed:

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	574	398	458	1,045	2,475
Planned and Approved Units	0	0	0	299	299
ADUs	0	0	0	96	96
Remaining RHNA After Credits	574	398	458	650	2,080
5th Cycle Units*	43	29	99	308	479
Vacant & Nonvacant Units*	214	148	268	975	1,605
Potential Rezone*					0
Total Units in Inventory	257	177	367	1,283	2,084
Total Unit Surplus (Shortfall)	(317)	(221)	(91)	633	4

Maximum Residential Densities

Zone District	Max Residential Density
Residential	
R-A	1 du/3 acres*
R-1	8 du/acre**
R-2	14 du/acre**
R-3	25 du/acre**
Commercial	
C-1	25 du/acre**
Agriculture	
A-2	2 du/20 acres

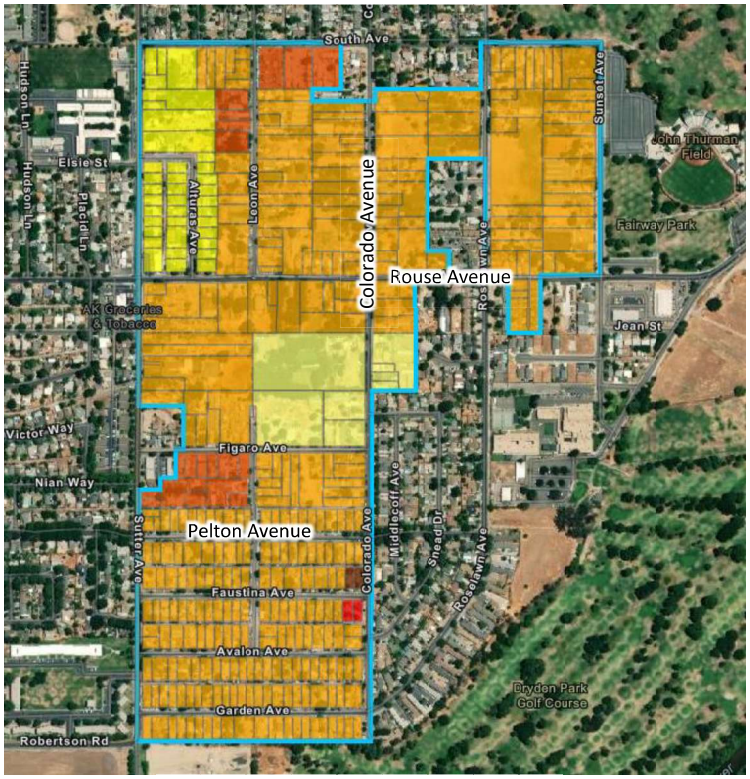
*If the General Plan land use is Estate Residential, the minimum lot size is 3 acres. Otherwise, minimum lot size is 8,000SF.
**Maximums are subject to underlying General Plan land use and if parcel is connected to sewer and water.

Approaches to Meet Lower Income RHNA

Example 1: *Rezone Specific Residential Parcels*

- R-2 to R-3
- R-1 to R-3

Example Area: Rouse/Colorado

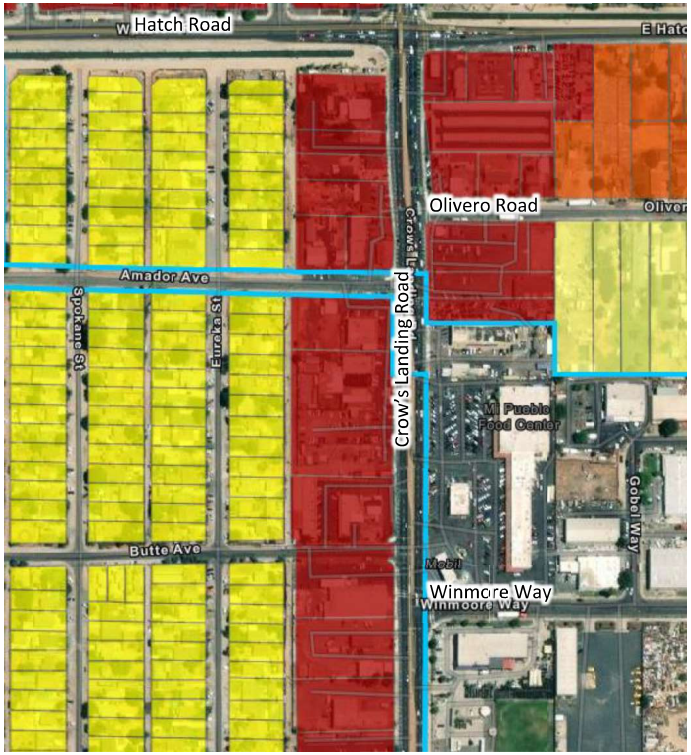


Approaches to Meet Lower Income RHNA

***Example 2**: Rezone Specific Commercial Parcels*

- Vacant/underutilized
- 0.5 - 10 acres
- Must meet minimum 20 du/acre
- C-1, R-3, or new district

Example Area: Commercial Corridor

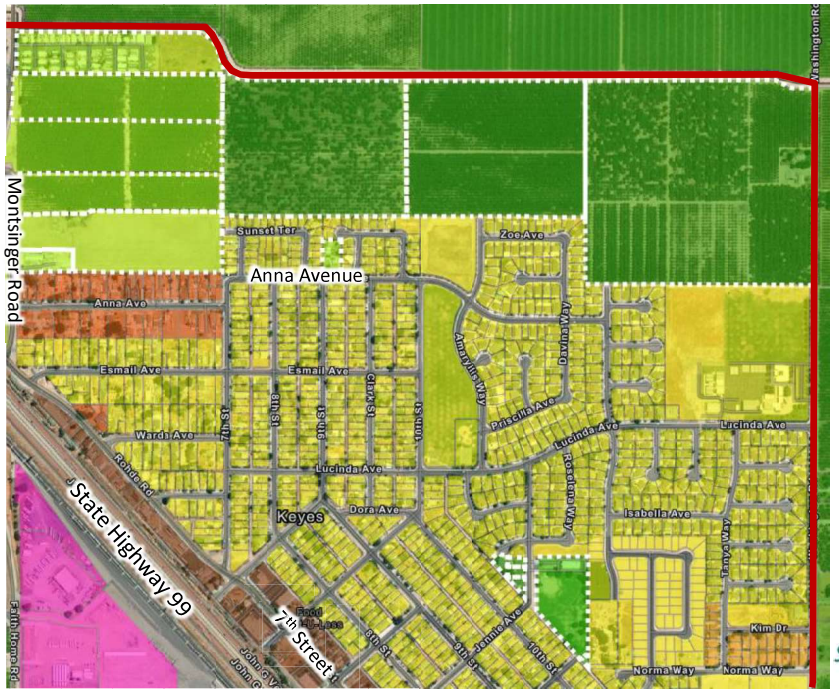


Approaches to Meet Lower Income RHNA

***Example 3**: Rezone Measure E exempt parcels*

- A-2 to C-1 or R-3
- For parcels over 10 acres, a development agreement, specific plan, or inclusionary requirement may be needed (to meet lower income RHNA)

Example area: North Keyes



Other Approaches

Policy Considerations

- Allow for higher density in General Plan Land Use Element
  - Up to 20 du/ac in Medium Density Residential
- Allow for higher density in some zone districts
  - Amend R-2 zone district to allow up to 20 du/ac

Q&A

Source: New Home Construction by Great Valley Center (Flickr, CC 2.0)

Additional Slides

Source: New Home Construction by Great Valley Center (Flickr, CC 2.0)

What happens if the County doesn't update the Housing Element?

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- The General Plan could be deemed inadequate and therefore invalid
- A noncompliant or invalid General Plan creates the potential for the County to be sued when making land use decisions
- The County would be ineligible for several Federal and State housing, community development and infrastructure funding and grant programs

RHNA Breakdown

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Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**

Housing Element Discussion

Source: Stanislaus County Affordable Housing Corporation

Questions

- What members of the community are most in need of housing and services?
- What are the unmet housing needs in Stanislaus County?
- What are the barriers to affordable housing in Stanislaus County?
- What can the County and community leaders do to address these needs and barriers?

Stanislaus County

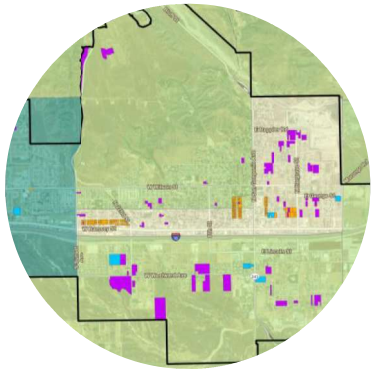
6th Cycle Housing Element Update

General Plan Update Committee Presentation

September 1, 2022 – 3:00 PM

Source: Stanislaus County Affordable Housing Corporation

What is a sites inventory?



The housing element of the general plan must include an inventory of land suitable and available for residential development to meet the locality's regional housing need by income level. (CA Gov. Code Sec. 65583.2)

6th Cycle Criteria

- Sites likely to redevelop/develop in next 8 years:
  - Vacant
  - Owner/developer interest
  - Low improvement to land value ratio
  - Low FAR if non-vacant
- Standards for lower income sites:
  - 0.5 and 10 acres in size
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  - Access to jobs, transit, and services

Sites Inventory Summary Table

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	**574**	**398**	**458**	**1,045**	**2,475**
Planned and Approved Units	0	0	0	317	317
ADUs	0	0	0	96	96
Remaining RHNA After Credits	**574**	**398**	**458**	**632**	**2,062**
4th and 5th Cycle Units*	23	15	91	219	348
Vacant & Nonvacant Units*	90	62	264	673	1,089
Potential Rezone*	698	484	215	0	1,397
Total Units After Credits	**811**	**561**	**570**	**892**	**2,834**
Total Unit Surplus	**237**	**163**	**112**	**260**	772
Total % Buffer above RHNA Allocation	**41%**	**41%**	**24%**		

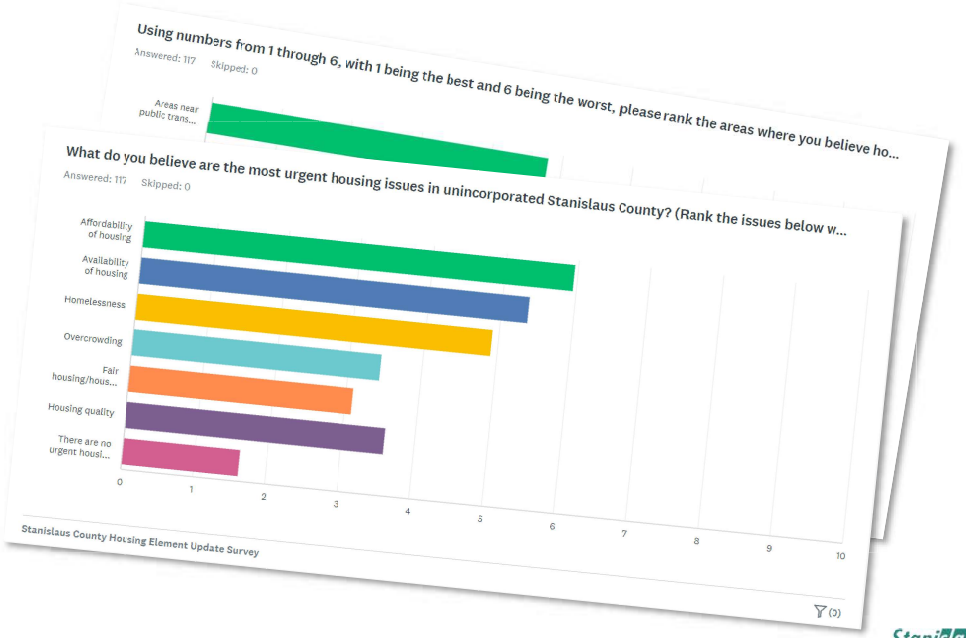
*Lower income units distributed proportionally between very low and low-income based on RHNA allocation

Preliminary Housing Survey Results

"Please rank (1-6) the areas where you believe housing should be developed in unincorporated Stanislaus County."

Top five responses:

1. Areas near public transit, employment, and shopping centers
2. Land that could be converted from commercial to residential or mixed-use
3. Vacant land on the edges of cities and unincorporated communities
4. Areas where there is existing housing
5. Agricultural land on the edges of cities and unincorporated communities



Implications from Rezone

Develop rezone program to:

- Permit owner-occupied and rental multifamily uses by right for developments in which 20% or more of the units are affordable to lower income households;
- Permit the development of at least 16 units per site;
- Rezone the identified parcels within 3 years and 120 days of the start of the Housing Element Cycle (April 2027).

Approaches to Meet Lower Income RHNA

- Rezone specific residential parcels
  - R-1 to R-3
  - R-2 to R-3
- Rezone specific commercial parcels
  - C-2 to C-1
  - C-2 to R-3
- Rezone Measure E parcels
  - Not needed to meet RHNA

Planning Sub-Areas Proposed for Rezone

- Bret Harte
- Denair
- Empire
- Grayson
- Keyes
- North Ceres
- Salida
- West Modesto

Additional Topics & Next Steps

- Environmental Justice Advisory Group
- Community Workshop #2 – Weds., Sept. 28th

Additional Slides

Source: New Home Construction by Great Valley Center (Flickr, CC 2.0)

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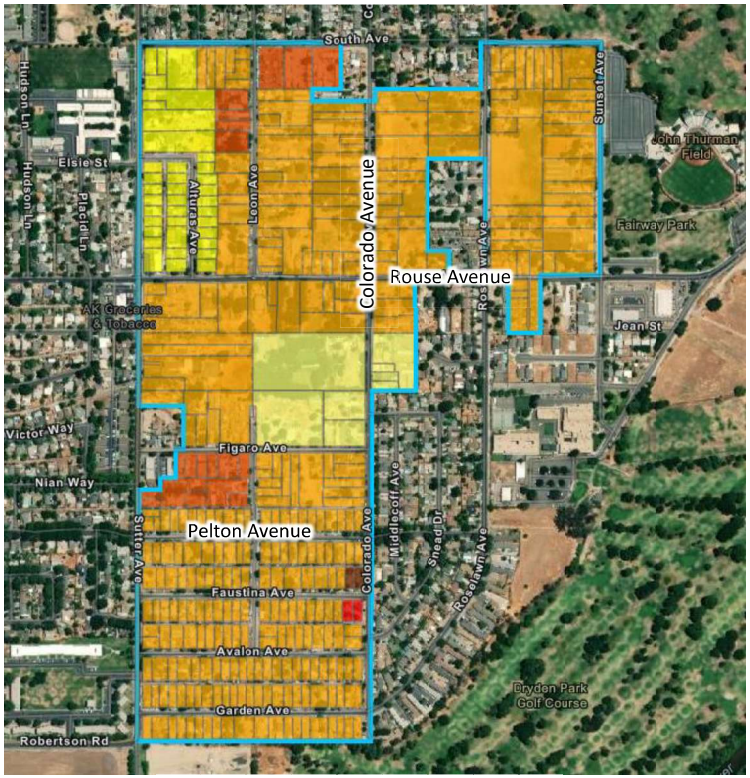
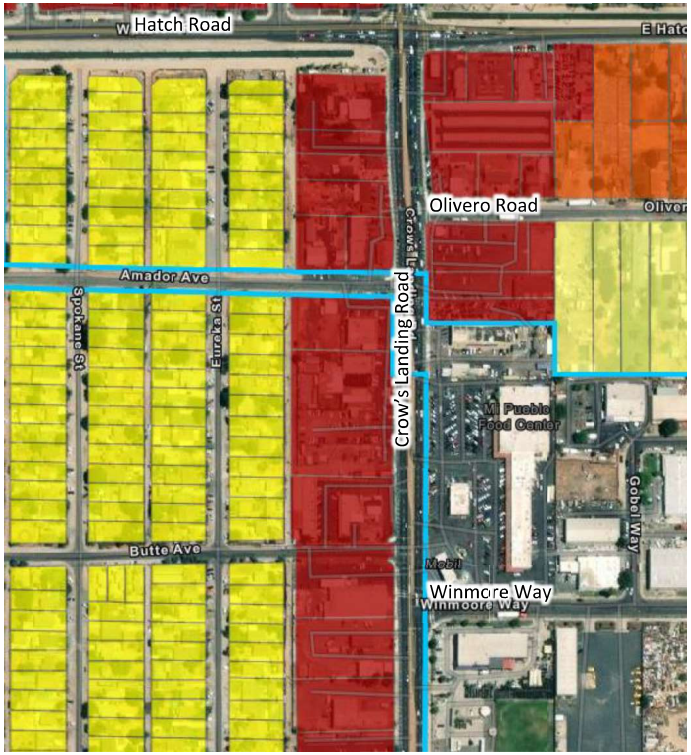


Approaches to Meet Lower Income RHNA

***Example 2**: Rezone Specific Commercial Parcels currently zoned C-2*

- Vacant/underutilized
- 0.5 - 10 acres
- Must meet minimum 20 du/acre
- C-1, R-3, or new district

Example Area: Commercial Corridor



Approaches to Meet Lower Income RHNA

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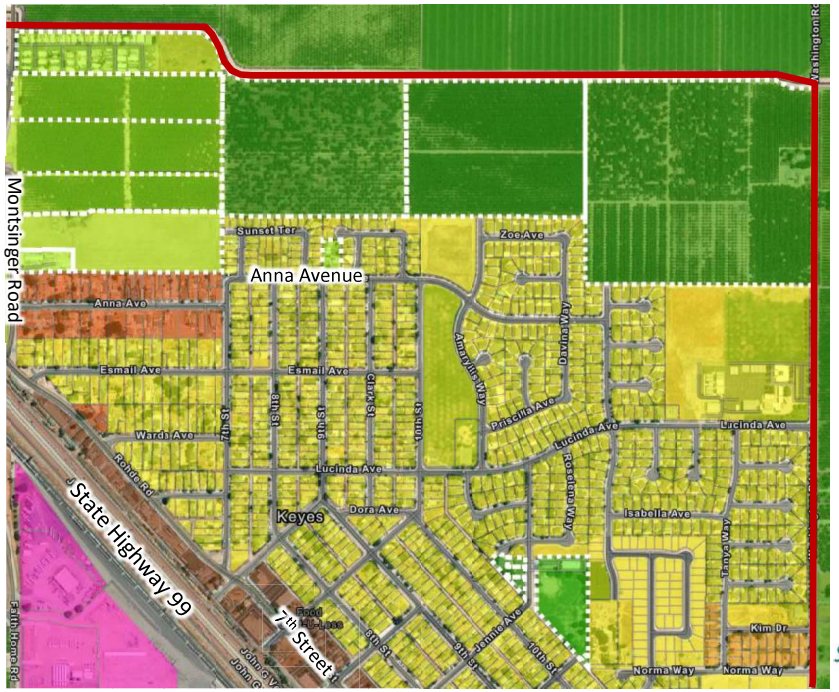

Stanislaus County 2023-2031 Housing Element Update

Community Workshop #1

June 23, 2022, 6:00-8:00pm
(https://us06web.zoom.us/j/86984953284)

Join us for a virtual community workshop to discuss the Housing Element Update for unincorporated Stanislaus County and related updates.

Housing Element
The Housing Element is one of the State-mandated components of the County's General Plan. It provides a framework for the County to accommodate future housing needs, including planning for housing that is suitable for all income levels. The Housing Element has two main purposes:

- To provide an assessment of current and future housing needs for the next eight years.
- To establish housing goals, policies, and programs that direct housing needs, reduce barriers to development, and ensure compliance with State legislation.

Safety Element
State law requires jurisdictions to update the Safety Element upon revision of the Housing Element. The goal of the Safety Element is to reduce the potential short and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards.

Environmental Justice
In September 2016, Senate Bill 1000 was adopted to require jurisdictions with "disadvantaged communities" to incorporate environmental justice policies into their general plans. Disadvantaged communities are neighborhoods with low-income households that are exposed to pollution (e.g., freeways, landfills). State law requires environmental justice policies to be incorporated into the general plan upon the adoption of two or more general elements, which is required in the case of Stanislaus County.

Questions?
Contact:
planning@stancounty.com

Stay up to date! *stancounty.com/housingelement*
Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.

Actualización del Elemento de Vivienda del Condado de Stanislaus 2023-2031

Taller comunitario #1

23 de junio de 2022, 6:00-8:00 p.m.
(https://us06web.zoom.us/j/86984953284)

Únase a nosotros en un taller comunitario para discutir la Actualización del Elemento de Vivienda y actualizaciones relacionadas.

Elemento de Vivienda
El Elemento de Vivienda es uno de los componentes obligatorios del Estado del Plan General del Condado. Proporciona un marco para que el Condado se adapte a las necesidades futuras de vivienda, incluida la planificación de viviendas adecuadas para todos los niveles de ingresos. El Elemento de Vivienda tiene dos propósitos principales:

- Evaluar las necesidades de vivienda actuales y futuras para los próximos ocho años.
- Establecer metas, políticas y programas de vivienda que orienten las necesidades de vivienda, reduzcan las barreras al desarrollo y aseguren el cumplimiento de la legislación estatal.

Elemento de seguridad
La ley estatal exige que las jurisdicciones actualicen el Elemento de seguridad tras la revisión del Elemento de vivienda. El objetivo del Elemento de seguridad es reducir el riesgo potencial a corto y largo plazo de fallecimientos, lesiones, daños a la propiedad y dislocación económica y social como resultado de incendios, inundaciones, sequías, terremotos, deslizamientos de tierra, cambio climático y otros peligros.

Justicia ambiental
En septiembre de 2016, se adoptó el Proyecto de Ley 1000 del Senado para exigir que las jurisdicciones con "comunidades desfavorecidas" incorporen políticas de justicia ambiental en sus planes generales. Las comunidades desfavorecidas son los barrios con hogares de ingresos bajos que están expuestos a la contaminación (p. ej., autopistas, vertederos). La ley estatal requiere que las políticas de justicia ambiental se incorporen al plan general luego de la adopción de dos o más elementos generales, lo cual se requiere en el caso del condado de Stanislaus.

¿Tiene alguna pregunta?
Contacto:
planning@stancounty.com

¡Manténgase al día! stancounty.com/housingelement
Visite el sitio web del proyecto para registrarse en nuestra lista de correo electrónico. Vuelva a consultar periódicamente los anuncios de las reuniones, los materiales de los talleres y los documentos públicos para su revisión a lo largo del proyecto.

STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

Upcoming Community Workshop

Where should housing be built?

You can help answer this question and guide the future of housing in unincorporated Stanislaus County!

Community Workshop

Tuesday, October 11, 2022
6:00 - 7:30 pm

Ceres Community Center
2701 4th Street
Ceres, CA 95307

Questions?

Contact:
planning@stancounty.com
209-525-6330

Stanislaus County is holding a community workshop to discuss the Housing Element Update, as well as the Safety and Environmental Justice Elements. The focus of the workshop is seek input on sites appropriate for the development of housing and to present information and initial findings related to the safety and environmental justice topics in the County. See you there!

Stay up to date! stancounty.com/housingelement

Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.

STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

Upcoming Community Workshop

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You can help answer this question and guide the future of housing in unincorporated Stanislaus County!

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Questions?

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planning@stancounty.com
209-525-6330

Visit: stancounty.com/housingelement

Stanislaus County
Housing Element Overview

State law does not require Stanislaus County to build or finance new housing, but we must plan for it.

What is a Housing Element?

The Housing Element is the County's plan to meet the housing needs of all unincorporated County residents. It is part of the Stanislaus County General Plan, which serves as the blueprint for how Stanislaus will grow and address changing need for development.

Why is Stanislaus County updating its Housing Element?

All cities and counties within the State of California must update their Housing Element for the 2023-2031 planning period. Housing Elements must be updated every eight years and be certified by the California Department of Housing and Community Development (HCD).

What happens if Stanislaus County does not adopt a Housing Element?

Stanislaus could face lawsuits, lose decision-making authority for certain housing projects, and become ineligible for state funding for housing programs. These and other consequences are written in state law.

Components of a Housing Element

- **Housing Needs Assessment**. Examines demographic, employment, and housing trends and conditions.
- **Evaluation of Past Performance**. Reviews and measures progress of the prior Housing Element.
- **Housing Sites Inventory**. Identifies locations of available sites for housing development or redevelopment to determine if there is enough land zoned for housing to meet the Regional Housing Needs Allocation (RHNA) and future need.
- **Community Outreach and Engagement**. Implements a community outreach and engagement program to all economic segments of the community, with particular focus on outreach to traditionally underrepresented groups, to find solutions to addressing local housing challenges.
- **Constraints Analysis**. Analyzes and recommends remedies for existing and potential governmental and nongovernmental barriers to housing development.
- **Policies and Programs**. Establishes policies and programs to fulfill the identified housing needs.

The State of California Housing and Community Development (HCD) determines the number of new homes Stanislaus County and the cities within the County need to plan for at different affordability levels to meet the housing needs of people at all income levels within the 8-year planning period.

Every county and city in California receives the **Regional Housing Needs Allocation (RHNA)** which provides the target number of homes to plan for. Stanislaus County and the cities within the County must plan for a total of 34,344 housing units.

The Stanislaus Council of Governments (StanCOG) distributes each jurisdiction's share of the RHNA by income category. Unincorporated Stanislaus County must plan for 2,475 housing units in this cycle of the RHNA, which is currently in the sixth cycle.

We want to hear from you!

What kind of housing (condos, townhomes, apartments, etc.) do you think the County should plan for?

What types of housing assistance (downpayment assistance for first time homebuyers, rental assistance, rehab/repair of owned or rental units, etc.) do you think the County should focus on for the next eight years?

What housing services (landlord and tenant counseling, promoting housing choice, education on tenant rights, etc.) do you feel are most needed within the County?

Send comments and questions to the Planning Department:

Email: planning@stancounty.com

Phone: (209) 525-6330

Scan the QR code or follow the link below to learn more or review the Draft Housing Element.

www.stancounty.com/planning/pl/housing-element.shtm

Condado de Stanislaus
Descripción general del elemento de vivienda

La ley estatal no requiere que el condado de Stanislaus construya o financie nuevas viviendas, pero debemos planificarlo.

¿Qué es un Elemento de Vivienda?

El Elemento de Vivienda es el plan del Condado para satisfacer las necesidades de vivienda de todos los residentes de las zonas no incorporadas. Forma parte del Plan General del Condado de Stanislaus, que sirve como modelo para el crecimiento de Stanislaus y para abordar los cambios necesarios para el desarrollo.

¿Por qué el Condado de Stanislaus está actualizando su Elemento de Vivienda?

Todas las ciudades y condados del estado de California deben actualizar su Elemento de Vivienda para el período de planificación 2023-2031. Los Elementos de Vivienda deben actualizarse cada ocho años y estar certificados por el Departamento de Vivienda y Desarrollo Comunitario de California (HCD).

¿Qué sucede si el condado de Stanislaus no adopta un elemento de vivienda?

Stanislaus podría enfrentar demandas, perder la autoridad para tomar decisiones en ciertos proyectos de vivienda y quedar inhabilitado para recibir fondos estatales para programas de vivienda. Estas y otras consecuencias están estipuladas en la ley estatal.

Componentes de un elemento de vivienda

- **Evaluación de Necesidades de Vivienda.** Examina las tendencias y condiciones demográficas, laborales y de vivienda.
- **Evaluación del desempeño anterior.** Revisa y mide el progreso del elemento de vivienda anterior.
- **Inventario de Terrenos para Vivienda.** Identifica la ubicación de los terrenos disponibles para el desarrollo o la reurbanización de viviendas, a fin de determinar si hay suficiente terreno zonificado para vivienda que cumpla con la Asignación Regional de Necesidades de Vivienda (RHNA) y las necesidades al futuro.
- **Alcance y Participación Comunitaria.** Implementa un programa de alcance y participación comunitaria dirigido a todos los segmentos económicos de la comunidad, con especial atención a los grupos tradicionalmente subrepresentados, para encontrar soluciones a los problemas locales de vivienda.
- **Análisis de restricciones.** Analiza y recomienda soluciones para las barreras gubernamentales y no gubernamentales existentes y potenciales al desarrollo de vivienda.
- **Políticas y programas.** Establece políticas y programas para satisfacer las necesidades de vivienda identificadas.

Vivienda y Desarrollo Comunitario del Estado de California (HCD) determina la cantidad de viviendas nuevas que el condado de Stanislaus y las ciudades dentro del condado necesitan planificar con diferentes niveles de asequibilidad para satisfacer las necesidades de vivienda de las personas en todos los niveles de ingresos dentro del período de planificación de 8 años.

Cada condado y ciudad de California recibe la Asignación Regional de Necesidades de Vivienda (RHNA), que establece el número objetivo de viviendas para planificar. El condado de Stanislaus y las ciudades que lo conforman deben planificar un total de 34,344 viviendas.

El Consejo de Gobiernos de Stanislaus (StanCOG) distribuye la parte de la RHNA correspondiente a cada jurisdicción según la categoría de ingresos. El Condado de Stanislaus no incorporado debe planificar 2475 viviendas en este ciclo de la RHNA, que actualmente se encuentra en su sexto ciclo.

¡Queremos saber de ti!

¿Qué tipo de viviendas (condominios, casas adosadas, apartamentos, etc.) cree usted que debería planificar el condado?

¿Que tipo de asistencia de vivienda (asistencia para el pago inicial para compradores de vivienda por primera vez, asistencia para el alquiler, rehabilitación/reparación de unidades propias o de alquiler, etc.) cree que el condado debería centrarse durante los próximos ocho años?

¿Qué servicios de vivienda (asesoramiento a propietarios e inquilinos, promoción de la elección de vivienda, educación sobre los derechos de los inquilinos, etc.) considera que son los más necesarios en el condado?

Envíe comentarios y preguntas al Departamento de Planificación:
Correo electrónico: planning@stancounty.com
Teléfono: (209) 525-6330

Escanee el código QR o siga el enlace a continuación para obtener más información o revisar el Borrador del Elemento de Vivienda.

www.stancounty.com/planning/pl/housing-element.shtm

Condado de Stanislaus
La Actualización del elemento de vivienda

La ley estatal no requiere que el condado de Stanislaus construya o financie nuevas viviendas, pero debemos planificarlo.

Stanislaus County
Housing Element Update

State law does not require Stanislaus County to build or finance new housing, but we must plan for it.

Escanee el código QR o siga el enlace a continuación para obtener más información o revisar el Borrador del Elemento de Vivienda.

Scan the QR code or follow the link below to learn more or review the Draft Housing Element.

www.stancounty.com/planning/pl/housing-element.shtm

¡Queremos saber de ti!

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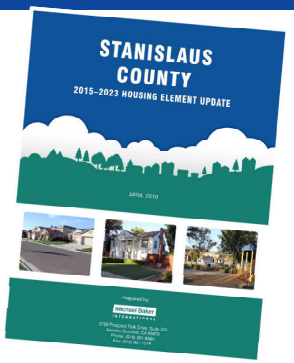
1

What is a Housing Element?

- One of eight elements in the County General Plan
- Housing Element updates required by State law in eight year "cycles."
- Currently preparing the 6th cycle Housing Element update
- Updates done on a schedule prescribed by the State (adoption deadline December 31, 2023)



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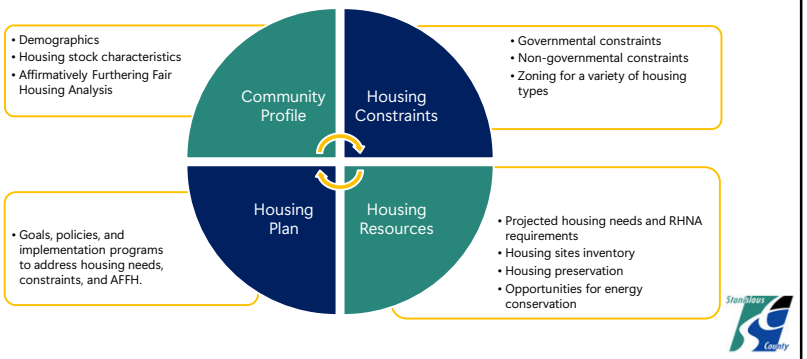
Housing Element Basics



3

StanCOG RHNA Distribution

StanCOG
Stanislaus Council of Governments
2023-2031 RHNA = 34,344 housing units

Waterford 557	Ceres 3,361	Modesto 11,248	Unincorporated County 2,475	Turlock 5,802	Oakdale 1,665	Newman 1,048
		Patterson 3,716	Riverbank 3,591	Hughson 881		

Each jurisdiction must accommodate its "fair share" of the regional housing need.

4

Stanislaus County Housing Need Requirement

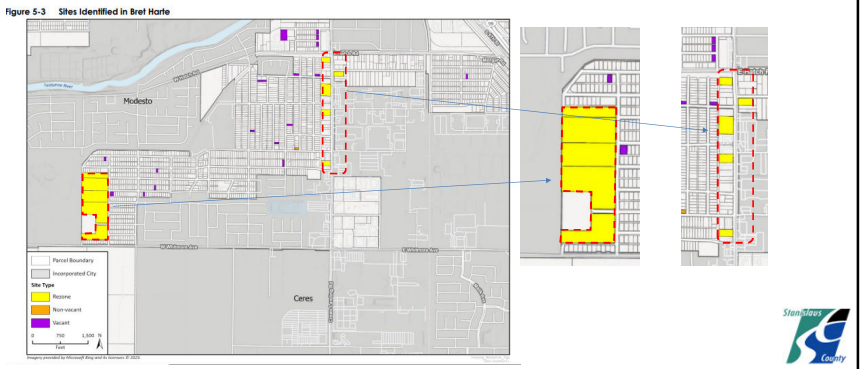
RHNA for Unincorporated Stanislaus County by Income Category, 2023-2031 and Ability to Pay for Housing Based on HCD Income Limits, Stanislaus County, 2022

Income Category	RHNA (Housing Units)	Estimated Income (Four Person Household)	Maximum Affordable Monthly Rent
Extremely Low Income (<30% of Median Income)	287	< $18,850	$471
Very Low Income (30-50% of Median Income)	287	$31,450	$786
Low Income (50-80% of Median Income)	398	$50,300	$1,258
Moderate Income (80-120% of Median Income)	458	$62,850	$1,571
Above Moderate Income (>120% of Median Income)	1,045	> $74,450	$2,201
TOTAL	**2,475**	--	--

Source: StanCOG Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.

5

Sites Inventory – South Modesto



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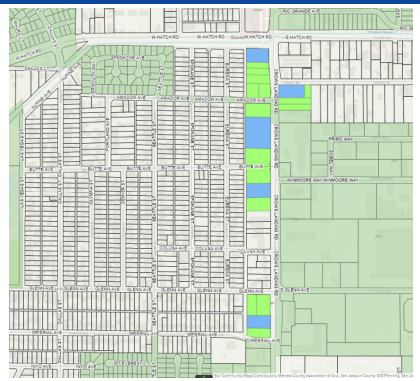
Sites Inventory – South Modesto

Soth Modesto
CROWS LANDING RD.



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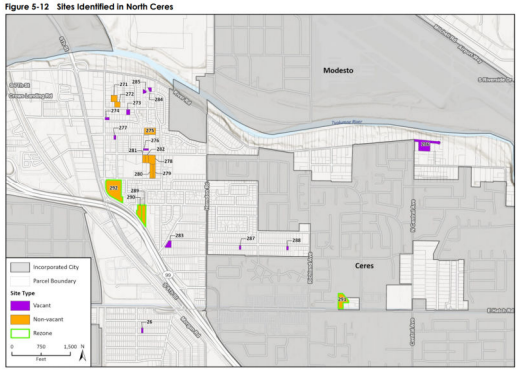
Sites Inventory – North Ceres



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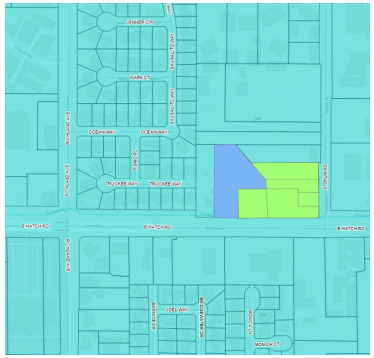
North Ceres
HATCH/STONUM



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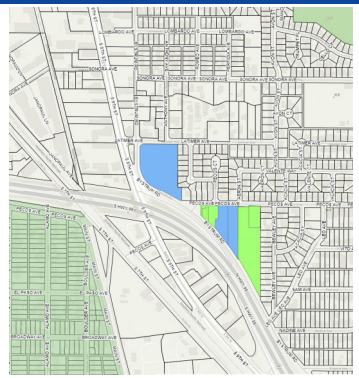
North Ceres
BYSTROM



10

Significant Programs and Actions

- Program 1-1: Home Rehabilitation
  - Provide housing rehabilitation assistance for owner-occupied lower-income households
  - Spread awareness of home and accessibility rehabilitation programs
- Program 2-1: Affordable Housing Development Assistance
  - Identify affordable housing development opportunities and promote housing choices for special needs populations
  - Ensure a streamlined process for affordable housing development
- Program 3-1: Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth
  - Actively promote sites available for affordable housing development
  - Amend Zoning Ordinance to prohibit development of single-family dwellings in multifamily zones

11

Significant Programs and Actions Continued

- Program 4-1: Housing for Special Needs Populations
  - Encourage the inclusion of units and services needed to support individuals with special needs
  - Encourage the use of Universal Design Principles in new construction and/or rehabilitation of housing
- Program 5-1: Affirmatively Furthering Fair Housing & Environmental Justice
  - Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households
  - Strive to achieve and maintain recognition as a "Prohousing" jurisdiction
- Program 5-2: Fair Housing Services
  - Provide fair housing and tenant/landlord services, including housing counseling and education and tenant/landlord counseling and mediation
  - Require contracted fair housing provider to conduct random fair housing testing

12

Community Input - Housing

- What kind of housing (condos, townhomes, apartments, etc.) do you think the County should plan for?
- What types of housing assistance (down payment assistance for first time homebuyers, rental assistance, rehab/repair of owner or rental units, etc.) do you think the County should focus on for the next eight years?
- What housing services (landlord and tenant counseling, promoting housing choice, education on tenant right, etc.) do you feel are most needed within the County?
- What members of the community are most in need of housing and services?

13

Safety and Environmental Justice Element Updates

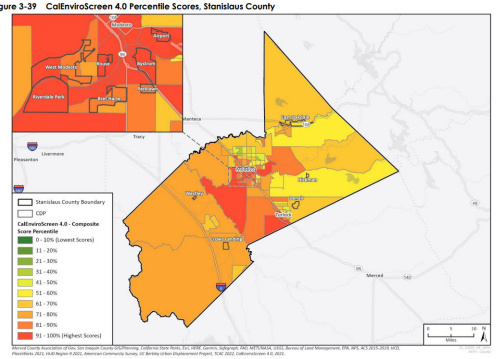
New requirements include:

- Flooding
- Wildfires
- Climate Change
- Emergency Evacuation

14

Safety and Environmental Justice Element Updates

Figure 3-39 CalEnviroScreen 4.0 Percentile Scores, Stanislaus County



Pollution Burden

- **Exposures**
  - Ozone Concentrations
  - PM2.5 Concentrations
  - Diesel PM Emissions
  - Drinking Water Contaminants
  - Children's Lead Risk from Housing
  - Pesticide Use
  - Toxic Releases from Facilities
  - Traffic Impacts
- **Environmental Effects**
  - Cleanup Sites
  - Groundwater Threats
  - Hazardous Waste
  - Impaired Water Bodies
  - Solid Waste Sites and Facilities

Population Characteristics

- **Sensitive Populations**
  - Asthma Emergency Department Visits
  - Cardiovascular Disease (Heart Attacks)
  - Low Birth Weight Infants
- **Socioeconomic Factors**
  - Educational Attainment
  - Housing-Burdened Low-Income Households
  - Linguistic Isolation
  - Poverty
  - Unemployment

15

Safety and Environmental Justice Element Updates

The County's Environmental Justice policies will focus on supporting disadvantaged communities to:

Reduce Unique or Compounded Health Risks

Promote Civic Engagement in Public Decision-Making Processes

Prioritize Improvements & Programs

16

Safety and Environmental Justice Element Updates

Required environmental justice analysis focus areas:

- **Pollution exposure (e.g., air quality, pesticides)**
- **Access to public facilities (e.g., parks, open space)**
- **Food access**
- **Safe and sanitary homes**
- **Physical activity and health**
- **Civic Engagement**

Policies will be integrated throughout the existing General Plan Elements

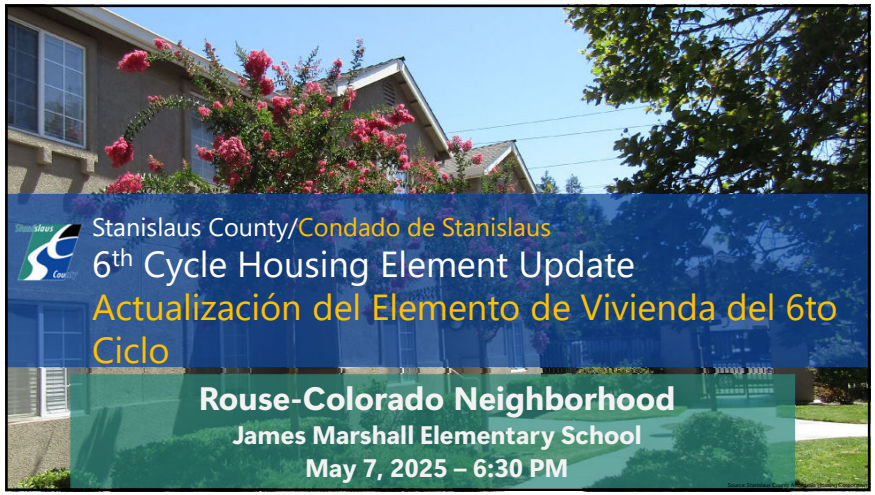
17

Community Input – Safety and Environmental Justice

- How have hazard events (such as flood, heat events, drought, etc.) impacted your ability to conduct day to day living or business?
- What are the hazards of most concern to you?
- Are there specific actions related to climate risks you would like to see taken in your community?
- What pollution concerns are a priority for you within your community?
- Are County public facilities (parks, non-motorized transportation, libraries) accessible to you?
- How do you access healthy groceries and food?
- How can the County better support your overall health and physical activity?

18

19



Stanislaus County/Condado de Stanislaus

6th Cycle Housing Element Update

Actualización del Elemento de Vivienda del 6to Ciclo

Rouse-Colorado Neighborhood

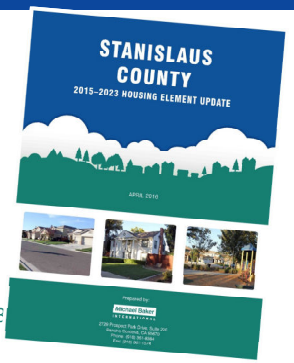
James Marshall Elementary School

May 7, 2025 – 6:30 PM

1

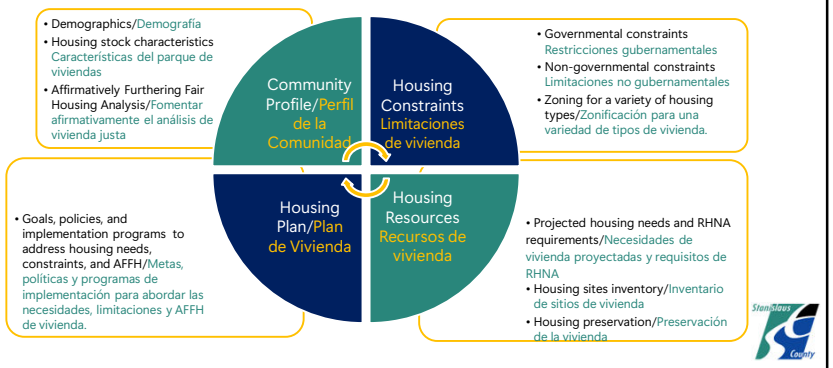
What is a Housing Element?/¿Qué es un elemento de vivienda?

- One of eight elements in the County General Plan/Uno de los ocho elementos del Plan General del Condado.
- Housing Element updates required by State law in eight year "cycles."/Actualizaciones de los elementos de vivienda requeridas por la ley estatal en "ciclos" de ocho años.
- Currently preparing the 6th cycle Housing Element update/Actualmente preparando la actualización del Elemento de Vivienda del 6to ciclo.
- Updates done on a schedule prescribed by the State (adoption deadline December 31, 2023)/Actualizaciones realizadas según un cronograma prescrito por el Estado.(La fecha límite de adopción fue el 31 de diciembre de 2023



2

Housing Element Basics/Conceptos básicos de los elementos de la vivienda



3

StanCOG RHNA Distribution/Distribución de RHNA en StanCOG

StanCOG
Stanislaus Council of Governments
Consejo de Gobiernos de Stanislaus
2023-2031 RHNA = 34,344 units/unidades

Waterford 557	Ceres 3,361	Modesto 11,248	Unincorporated County 2,475	Turlock 5,802	Oakdale 1,665	Newman 1,048
		Patterson 3,716	Riverbank 3,591	Hughson 881		

Each jurisdiction must accommodate its "fair share" of the regional housing need.
Cada jurisdicción debe acomodar su "participación justa" de la necesidad regional de vivienda.

4

RHNA Distribution/Distribución de RHNA

RHNA for Unincorporated Stanislaus County by Income Category, 2023-2031 and Ability to Pay for Housing Based on HCD Income Limits
RHNA para el condado no incorporado de Stanislaus por categoría de ingresos, 2023-2031 y capacidad para pagar la vivienda según los límites de ingresos del HCD

Income Category Categoría de ingresos	RHNA (Housing Units Unidades de Vivienda)	Estimated Income (Four Person Household Hogar de cuatro personas)	Maximum Affordable Monthly Rent Alquiler mensual máximo asequible
Extremely Low Income Ingresos extremadamente bajos (<30% of Median Income del ingreso medio)	287	< $18,850	$471
Very Low Income Ingresos muy bajos (30-50% of Median Income del ingreso medio)	287	$31,450	$786
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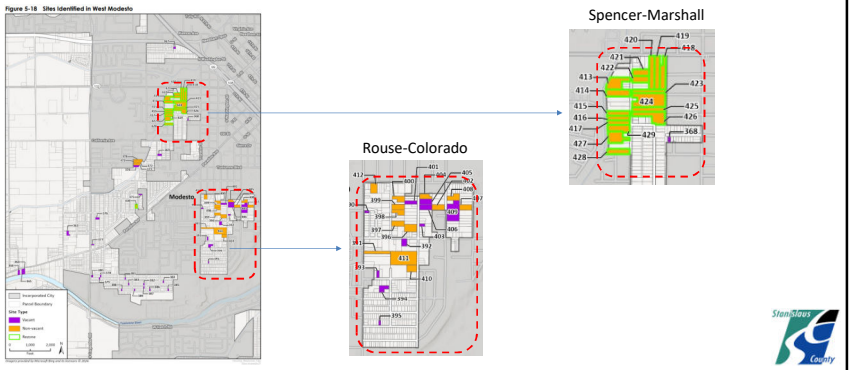
Moderate Income Ingreso moderado (80-120% of Median Income del ingreso medio)	458	$62,850	$1,571
Above Moderate Income Ingresos superiores a los moderados (>120% of Median Income del ingreso medio)	1,045	> $74,450	$2,201
TOTAL	**2,475**	--	--

5

Sites Inventory/Inventario de sitios – West Modesto



6

Significant Programs and Actions/Programas y Acciones Significativas

- Goal/Meta 1: Conserve and enhance existing housing opportunities Conservar y mejorar las oportunidades de vivienda existentes
  - Housing rehabilitation program Programa de rehabilitación de viviendas
- Goal/Meta 2: Affordable Housing Development Assistance Asistencia para el Desarrollo de Viviendas Accesibles
  - Identify affordable housing development opportunities and streamline process for affordable housing development Identificar oportunidades de desarrollo de viviendas accesibles y agilizar el proceso para el desarrollo de viviendas accesibles
  - Housing Trust Fund Fondo Fiduciario para la Vivienda
  - Regional Collaboration Colaboración regional

7

Significant Programs and Actions/Programas y Acciones Significativas

- Goal/Meta 3: Increase Housing Production by Providing Adequate Sites for a Variety of Housing Types Aumentar la producción de viviendas proporcionando sitios adecuados para una variedad de tipos de viviendas
  - Actively promote sites available for affordable housing development Promover activamente los sitios disponibles para el desarrollo de viviendas accesibles
  - Encourage and assist with ADU development Fomentar y ayudar con el desarrollo de ADU
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Significant Programs and Actions/Programas y Acciones Significativas

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  - Active transportation in low resource communities Transporte activo en comunidades de bajos recursos
  - Economic development Desarrollo económico
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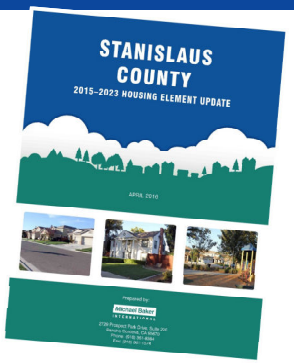

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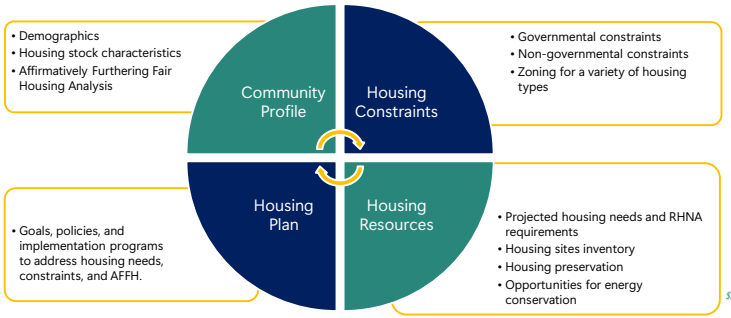
Housing Element Basics



3

StanCOG RHNA Distribution

StanCOG
Stanislaus Council of Governments
2023-2031 RHNA = 34,344 housing units

Waterford 557	Ceres 3,361	Modesto 11,248	Unincorporated County 2,475	Turlock 5,802	Oakdale 1,665	Newman 1,048
		Patterson 3,716	Riverbank 3,591	Hughson 881		

Each jurisdiction must accommodate its "fair share" of the regional housing need.

4

Stanislaus County Housing Need Requirement

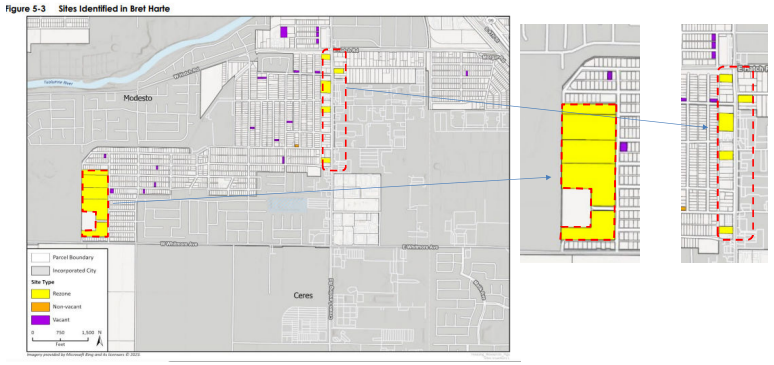
RHNA for Unincorporated Stanislaus County by Income Category, 2023-2031 and Ability to Pay for Housing Based on HCD Income Limits, Stanislaus County, 2022

Income Category	RHNA (Housing Units)	Estimated Income (Four Person Household)	Maximum Affordable Monthly Rent
Extremely Low Income (<30% of Median Income)	287	< $18,850	$471
Very Low Income (30-50% of Median Income)	287	$31,450	$786
Low Income (50-80% of Median Income)	398	$50,300	$1,258
Moderate Income (80-120% of Median Income)	458	$62,850	$1,571
Above Moderate Income (>120% of Median Income)	1,045	> $74,450	$2,201
TOTAL	**2,475**	--	--

Source: StanCOG Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.

5

Site Inventory Summary – South Modesto



6

Significant Programs and Actions

- Program 1-1: Home Rehabilitation
  - Provide housing rehabilitation assistance for owner-occupied lower-income households
  - Spread awareness of home and accessibility rehabilitation programs
- Program 2-1: Affordable Housing Development Assistance
  - Identify affordable housing development opportunities and promote housing choices for special needs populations
  - Ensure a streamlined process for affordable housing development
- Program 3-1: Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth
  - Actively promote sites available for affordable housing development
  - Amend Zoning Ordinance to prohibit development of single-family dwellings in multifamily zones

7

Significant Programs and Actions Continued

- Program 4-1: Housing for Special Needs Populations
  - Encourage the inclusion of units and services needed to support individuals with special needs
  - Encourage the use of Universal Design Principles in new construction and/or rehabilitation of housing
- Program 5-1: Affirmatively Furthering Fair Housing & Environmental Justice
  - Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households
  - Strive to achieve and maintain recognition as a "Prohousing" jurisdiction
- Program 5-2: Fair Housing Services
  - Provide fair housing and tenant/landlord services, including housing counseling and education and tenant/landlord counseling and mediation
  - Require contracted fair housing provider to conduct random fair housing testing

8

For more information
visit www.stancounty.com/planning
planning@stancounty.com
(209) 525-6330

9

Stanislaus County/Condado de Stanislaus

6th Cycle Housing Element Update

Actualización del Elemento de Vivienda del 6to Ciclo

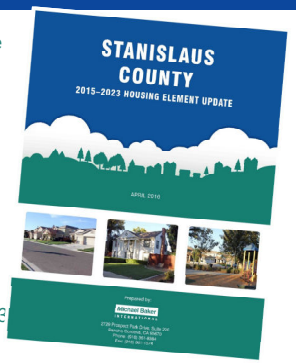
South Modesto Municipal Advisory Council

May 8, 2025 – 6:00 PM

1

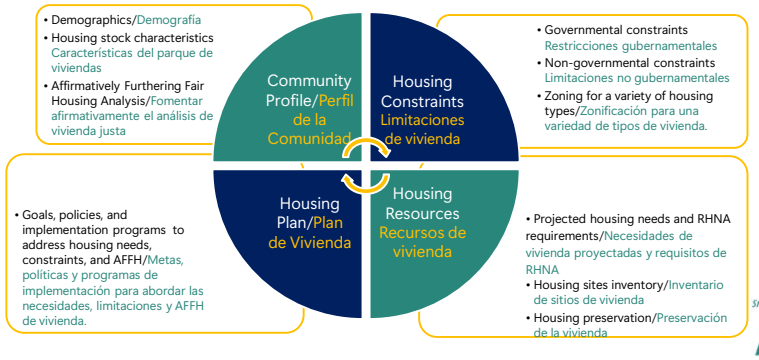
What is a Housing Element?/¿Qué es un elemento de vivienda?

- One of eight elements in the County General Plan/Uno de los ocho elementos del Plan General del Condado.
- Housing Element updates required by State law in eight year "cycles."/Actualizaciones de los elementos de vivienda requeridas por la ley estatal en "ciclos" de ocho años.
- Currently preparing the 6th cycle Housing Element update/Actualmente preparando la actualización del Elemento de Vivienda del 6to ciclo.
- Updates done on a schedule prescribed by the State (adoption deadline December 31, 2023)/Actualizaciones realizadas según un cronograma prescrito por el Estado.(La fecha límite de adopción fue el 31 de diciembre de 2023



2

Housing Element Basics/Conceptos básicos de los elementos de la vivienda



3

StanCOG RHNA Distribution/Distribución de RHNA en StanCOG

StanCOG
Stanislaus Council of Governments
Consejo de Gobiernos de Stanislaus
2023-2031 RHNA = 34,344 units/unidades

Waterford 557	Ceres 3,361	Modesto 11,248	Unincorporated County 2,475	Turlock 5,802	Oakdale 1,665	Newman 1,048
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Each jurisdiction must accommodate its "fair share" of the regional housing need.
Cada jurisdicción debe acomodar su "participación justa" de la necesidad regional de vivienda.

4

RHNA Distribution/Distribución de RHNA

RHNA for Unincorporated Stanislaus County by Income Category, 2023-2031 and Ability to Pay for Housing Based on HCD Income Limits
RHNA para el condado no incorporado de Stanislaus por categoría de ingresos, 2023-2031 y capacidad para pagar la vivienda según los límites de ingresos del HCD

Income Category Categoría de ingresos	RHNA (Housing Units Unidades de Vivienda)	Estimated Income (Four Person Household Hogar de cuatro personas)	Maximum Affordable Monthly Rent Alquiler mensual máximo asequible
Extremely Low Income Ingresos extremadamente bajos (<30% of Median Income del ingreso medio)	287	< $18,850	$471
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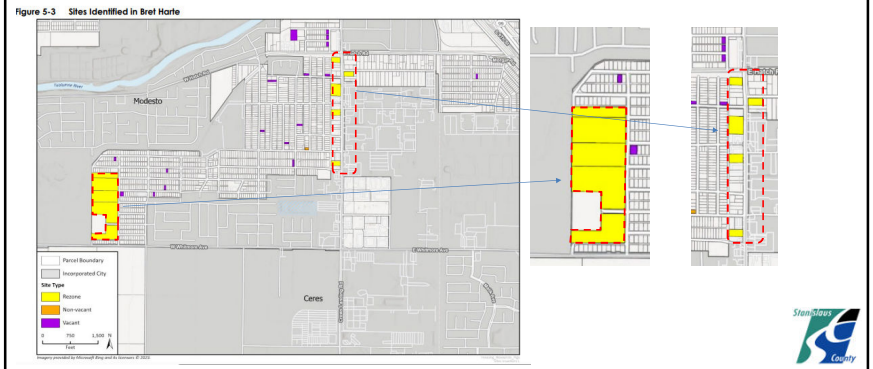
TOTAL	**2,475**	--	--

5

Sites Inventory/Inventario de sitios – South Modesto



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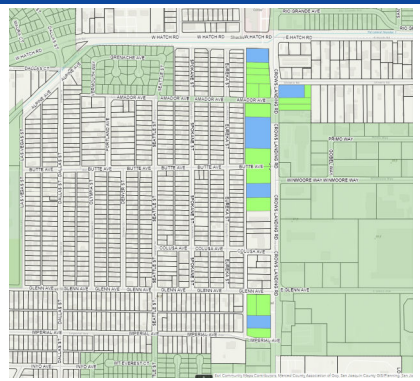
Sites Inventory/Inventario de sitios – South Modesto

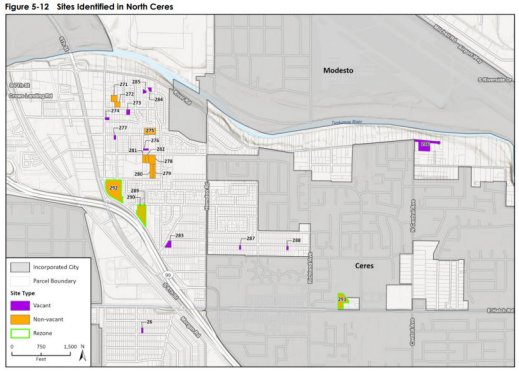
CROWS LANDING RD.



Stanislaus County 6th Cycle Housing Element Update
GPUC Presentation (April 6, 2023)
7

7

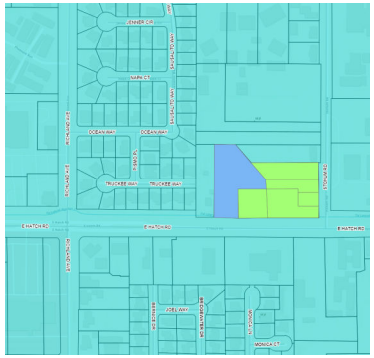
Sites Inventory/Inventario de sitios – North Ceres



8

Sites Inventory/Inventario de sitios – North Ceres

HATCH/STONUM



9

Sites Inventory/Inventario de sitios – North Ceres

BYSTROM

10

Significant Programs and Actions/Programas y Acciones Significativas

- Goal/Meta 1: Conserve and enhance existing housing opportunities Conservar y mejorar las oportunidades de vivienda existentes
  - Housing rehabilitation program Programa de rehabilitación de viviendas
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  - Identify affordable housing development opportunities and streamline process for affordable housing development Identificar oportunidades de desarrollo de viviendas accesibles y agilizar el proceso para el desarrollo de viviendas accesibles
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  - Encourage and assist with ADU development Fomentar y ayudar con el desarrollo de ADU
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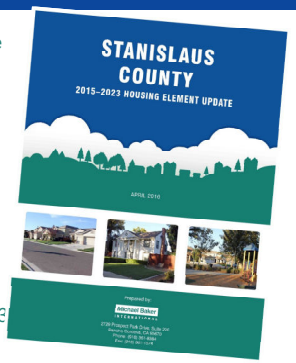

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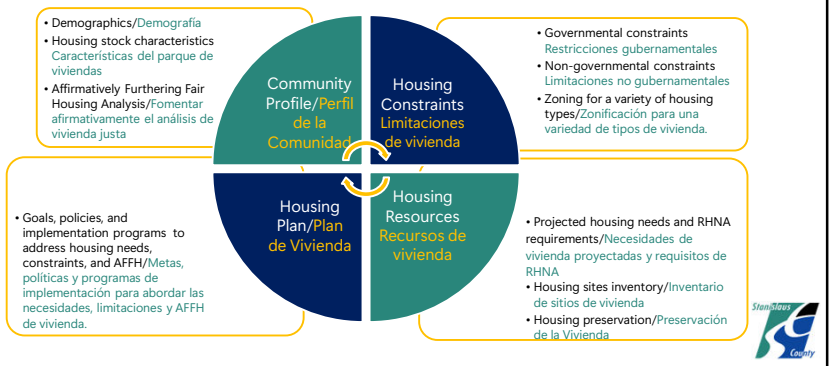

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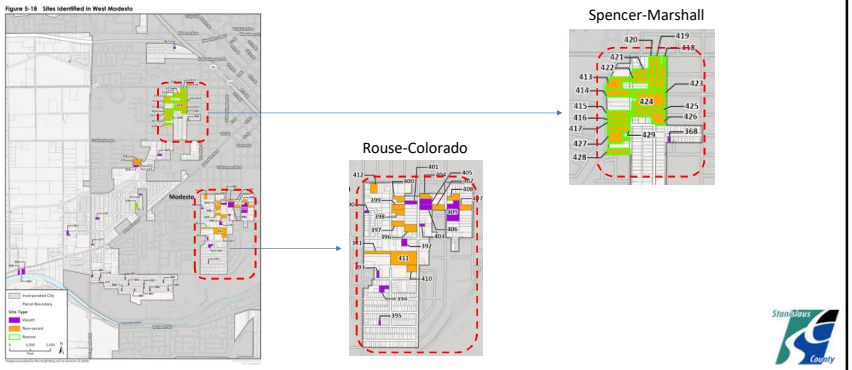

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10

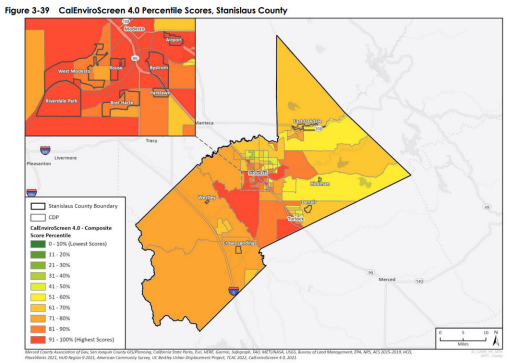
Safety and Environmental Justice Element Updates/Actualizaciones de los elementos de seguridad y justicia ambiental

New requirements include/Los nuevos requisitos incluyen:

- Flooding/Inundación
- Wildfires/Incendios
- Climate Change/Cambio climático
- Emergency Evacuation/Evacuación de emergencia

11

Safety and Environmental Justice Element Updates/Actualizaciones de los elementos de seguridad y justicia ambiental



- **Pollution exposures** (diesel PM emissions, drinking water contaminants, pesticide use, cleanup sites)/**Exposiciones a la contaminación** (emisiones de PM de diesel, contaminantes del agua potable, uso de plaguicidas, limpieza de sitios)
- **Health data** (asthma, heart attacks, low birth-weight infants)/**Datos de salud** (asma, ataques cardíacos, bebés con bajo peso al nacer)
- **Socioeconomic factors** (education, housing burden, linguistic isolation, poverty, unemployment)/ **Factores socioeconómicos** (educación, carga de la vivienda, aislamiento lingüístico, pobreza, desempleo)

12

Safety and Environmental Justice Element Updates/Actualizaciones de los elementos de seguridad y justicia ambiental

The County's Environmental Justice policies will focus on supporting disadvantaged communities to/Las políticas de Justicia Ambiental del Condado se centrarán en apoyar a las comunidades desfavorecidas para:

Reduce Unique or Compounded Health Risks/Reducir los riesgos para la salud únicos o combinados

Promote Civic Engagement in Public Decision-Making Processes/Promover la participación cívica en los procesos de toma de decisiones públicas

Prioritize Improvements & Programs/Priorizar mejoras y programas

13

Safety and Environmental Justice Element Updates/Actualizaciones de los elementos de seguridad y justicia ambiental

Required environmental justice analysis focus areas/ Áreas de enfoque requeridas para el análisis de justicia ambiental:

- Pollution exposure (e.g., air quality, pesticides)/Exposición a la contaminación (p. ej., calidad del aire, pesticidas)
- Access to public facilities (e.g., parks, open space)/Acceso a instalaciones públicas (p. ej., parques, espacios abiertos)
- Food access/Acceso a los alimentos
- Safe and sanitary homes/Hogares seguros e higiénicos
- Physical activity and health/Actividad física y salud
- Civic Engagement/Participacion Civica

Policies will be integrated throughout the existing General Plan Elements/Las políticas se integrarán en todos los elementos del Plan General existentes

14

Safety and Environmental Justice Element Updates/Actualizaciones de los elementos de seguridad y justicia ambiental

- How have hazard events (such as flood, heat events, drought, etc.) impacted your ability to conduct day to day living or business?/¿Cómo han afectado los eventos de peligro (como inundaciones, eventos de calor, sequía, etc.) su capacidad para llevar a cabo la vida cotidiana o los negocios?
- What are the hazards of most concern to you?/¿Cuáles son los peligros que más le preocupan?
- Are there specific actions related to climate risks you would like to see taken in your community?/¿Hay acciones específicas relacionadas con los riesgos climáticos que le gustaría que se tomaran en su comunidad?
- What pollution concerns are a priority for you within your community?/ ¿Qué preocupaciones sobre la contaminación son una prioridad para ti en tu comunidad?
- Are County public facilities (parks, non-motorized transportation, libraries) accessible to you?/¿Son accesibles las instalaciones públicas del condado (parques, transporte no motorizado, bibliotecas)?
- How do you access healthy groceries and food?/¿Cómo se accede a alimentos y comestibles saludables?
- How can the County better support your overall health and physical activity?/¿Cómo puede el Condado apoyar mejor su salud y actividad física en general?

15

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visit/visitar www.stancounty.com/planning
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16

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Attachment 4

Public Comments

Commenter	Topic	Comment
California Rural Legal Assistance, Inc.	Legal Outreach	The minimal and eleventh-hour outreach efforts on the part of the County do not represent a “diligent effort” to reach out to affected communities, and the County should take immediate steps to extend the public comment period and create a plan for obtaining meaningful feedback from the communities and population segments most affected by the proposed Housing Element update. In every Housing Element update, a jurisdiction is required to make and then describe its “diligent effort. . . to achieve public participation of all economic segments of the community in the development of the housing element.” A diligent effort means “going beyond simply giving the public an opportunity to provide input and should be proactively and broadly conducted through a variety of methods to assure access and participation.” As part of their obligation to affirmatively further fair housing, jurisdictions must also include a summary of their fair housing outreach capacity. This summary must describe the jurisdiction’s process for “meaningful, frequent, and ongoing public participation with key stakeholders” including community members who are lower income, persons and households with special needs, and members of other protected classes. Sections 1, 3, and Appendix A of the Draft Housing Element describe the methods and results of the County’s outreach process. In total, the County recounts two online surveying methods, two public workshops at early stages in the Housing Element process, and a series of Stakeholder interviews from which all public feedback used in the Draft Element was drawn. Few stakeholders or community groups had advanced notice of when the comment period on the Draft would begin, and thus were not able to conduct their own outreach. This is particularly problematic as interested organizations and constituents have the capacity to conduct Spanish language outreach, which is not possible with very little notice about the date on which the comment period would begin.
California Rural Legal Assistance, Inc.	Legal Outreach	Nearly every aspect of the County’s method of soliciting and obtaining public participation relied on technological literacy, isolating significant segments of Stanislaus County’s population included protected categories, such as people with disabilities, low income Latino communities, and people lacking technological infrastructure such people living in disadvantaged unincorporated communities. Many population segments with specific housing needs that must be addressed by the Housing Element suffer disproportionately from inadequate technological access or technological literacy. For groups such as persons and households with disabilities, residents experiencing homelessness, and elderly residents, it is critical for a jurisdiction to use outreach methods that do not present insurmountable technological barriers. Unfortunately, the County’s methods of public notice for its Housing Element process, as well as one of its only two workshops and all of its surveys, were made accessible only online. This alienates technologically limited segments of the population, including those identified as needing special outreach attention in order for the County to comply with relevant law, particularly disadvantaged groups critical to the Housing Element outreach process and Housing Needs Assessment.
California Rural Legal Assistance, Inc.	Legal Outreach	The first step to conducting diligent outreach is to inform the community of upcoming events via methods of communication the community uses and trusts. Using a mixture of media types is a well- known method for circulating information across diverse segments of the population. The County’s only methods of general public noticing for all Housing Element related events and publications, however, were flyers posted on the county’s website and social media accounts and circulated via email to the County’s email subscriber lists.8 For residents who do not engage with county processes on a regular basis, these are not accessible, obvious, or even plausible sources of information. The incredibly poor attendance to both workshops (discussed below) can likely be attributed to these incredibly narrow- ranging public notices. To effectively reach broader segments of the population, the County could have posted flyers for housing element related events in public spaces such as libraries, bus stops, community centers, and local gathering places. The County also could have publicized the process via the Modesto Bee, or any number of local radio stations. The County could have sent postcards to all unincorporated residents with dates and times, instead of only to property owners of sites identified for potential rezoning.9 CRLA is more than happy to work with the County to brainstorm more equitable, effective outreach methods to ensure that residents are able to meaningfully participate in planning processes such as the Housing Element in the future.
California Rural Legal Assistance, Inc.	Legal Outreach	The County did not attempt to lead a discussion of the programs and policies of the previous housing element and which are working or not working, even though the June workshop would have been the most logical time to hold such a discussion as required by Housing Element law. The October, 2022 community workshop was the only publicly accessible event held in person during the Draft Element’s development. The workshop was held after work hours to enable participation, but was held in a location – the Ceres Community Center – that is neither within the unincorporated county, nor is a common or well-known location to local residents from outside of the city of Ceres. CRLA staff in attendance can confirm that a maximum of 10-15 people attended this event. When CRLA staff asked whether additional meetings could be held in person in other locations; or virtually; or in a hybrid setting to enable broader community participation, County staff responded that there were “no plans at that time” to do so. No plans were made, and no other in person events were held for Stanislaus County’s Draft 6th Cycle Housing Element development process. The low level of engagement with this in person workshop can likely be attributed both to the unusual venue and the extremely narrow public notice method employed. It should be noted that following the publication of the Draft Element, the County took the month of September to attend a handful of Municipal Advisory Council meetings to present about it. Notice for these meetings was publicized nowhere except county listservs and the agendas of the MAC meetings themselves. CRLA staff regularly attend the South Modesto MAC meeting and were pleasantly surprised to see County staff in attendance in September. Had more advanced notice been provided, CRLA would have been happy to circulate flyers to increase attendance to the South Modesto MAC meeting, which has notoriously low attendance unless important announcements are expected.
California Rural Legal Assistance, Inc.	Legal Outreach	The online Sites Inventory tool was purported to offer detailed, parcel by parcel assessment of proposed sites. In practice, however, it was both insurmountably confusing to many residents and failed to offer sufficient detail to enable practical usage for other residents who were able to grasp it as a tool. While the tool offered the ability to select (with difficulty) individual parcels and view certain information, no information was provided about proximity to transportation infrastructure, infrastructural constraints, environmental harms, and other important features. Without this information readily available, even residents who were able to understand the tool were frequently unable to use it to provide meaningful information regarding where housing should be sited to the County.
California Rural Legal Assistance, Inc.	AFFH	The Fair Housing Assessment can help to identify both whether housing units are realistically likely to be developed and to assess whether impacts would be to reduce segregation or increase gentrification and segregation within and between communities. This information is critical for citizens to be able to form an understanding of the long term consequences of housing development and permitting decisions, and critical to citizens being able to provide meaningful comment. Holding public outreach workshops on the Sites Inventory prior to even beginning the Fair Housing Assessment phase was detrimental to both the community’s ability to participate in the Housing Element and the County’s ability to obtain sufficient feedback.

California Rural Legal Assistance, Inc.	AFFH	Nonprofit organizations can provide important analysis and information relevant to the Housing Element process, but community residents are the ones whose lives will experience the long term health, economic, and opportunity impacts of the Housing Element's policies and programs. As Appendix 1 indicates, the stakeholder meetings the County relied upon heavily for input into the Housing Element this cycle were held with 10 nonprofit organizations but only included conversations with a total of 11 people. Using the feedback of a set of individuals who are not necessarily even community residents as a proxy for an entire community's voice is not an acceptable substitution. More outreach meetings in the affected communities should be undertaken.
California Rural Legal Assistance, Inc.	AFFH	The Fair Housing Act requires a plan to affirmatively further fair housing consistent with the local jurisdiction's duty to affirmatively further fair housing under the federal Fair Housing Act12, including the obligation to prepare a Fair Housing Assessment.13 The Fair Housing Assessment must analyze the patterns of segregation and their origins and provide a strategy to remove barriers to undoing segregation. As detailed at length below, the Draft Housing Element's Fair Housing Assessment is deeply flawed on every level. It is vague, extremely light on analysis, and fails to address the regional history of segregation in sufficient detail to enable accurate assessment of whether proposed housing sites will result in greater integration or desegregation. While mention is made of historical conditions in the region, the Draft Fair Housing Assessment consistently fails to synthesize key historical connections or illuminate past disparities in infrastructure, annexation practices, and other local dynamics that have resulted in the racially and ethnically concentrated areas of poverty existent in the County today. The Fair Housing Analysis must be revised to meet requirements of state and federal law and to affirmatively further fair housing, since in its current form, it does not.
California Rural Legal Assistance, Inc.	AFFH	The Housing Element must include a Fair Housing Assessment.14 Among other components, the Fair Housing Assessment (FHA) must include a "summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity." HCD's AFFH Guidelines explain that this requirement is intended to demonstrate a jurisdiction's ability to disseminate information related to fair housing and provide outreach and education to assure community members are aware of their fair housing rights.15 The summary should include: 1) A listing of local, regional, and state agencies and organizations active in the locality 2) A description of primary activities and capacity for each entity, including actions taken by the locality, such as provision of dedicated resources 3) Evaluation of impacts on protected characteristics and demographic trends 4) Any additional relevant information about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region affecting groups with other protected characteristics." The Draft Element attempts to address all of these factors in Section 3.4.1, which consists of two paragraphs and a handful of bullet points.17 The analysis includes a definition of fair housing enforcement and outreach capacity, a basic outline of FEHA, and a list of general fair housing issues that may arise "in any jurisdiction."18 Section 3.4.2 goes into slightly more detail describing the County's process for referring discrimination complaints to the California Department of Fair Employment and Housing and the County's collaboration with a nonprofit organization called Project Sentinel on fair housing issues.19 This section contains no further analysis. This is wholly insufficient to the requirement that the Draft HE provide a "summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity." Little or no information specific to Stanislaus County's capacity and to the complex past actions that underly current conditions and that will affect the potential effectiveness of proposed actions.
California Rural Legal Assistance, Inc.	AFFH	In assessing Fair Housing patterns and trends in Stanislaus County, local knowledge and data is critical to an understanding of current housing needs and to an evaluation of potential effectiveness of proposed actions to impact segregation. In addition to the summary of fair housing issues and assessment of fair housing enforcement and outreach capacity, the Fair Housing Assessment must include an "analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk." The analysis has to not only identify, but also "examine" the patterns, trends, areas, disparities, and needs both within the jurisdiction and in regional context, based on race and other protected characteristics. In its version of the Fair Housing Assessment,22 the Draft Housing Element presents maps and data from various sources that provide a bare minimum of statistical information regarding patterns and trends associated with the fair housing issues specified in the statute and relevant HCD guidelines. However, the conclusions reached in every respect are hampered by a complete failure to integrate (or, in many cases, even include) critical local knowledge. For example, the history of annexations of more affluent unincorporated communities and failure to annex or provide infrastructure to low income Latino communities has led to segregation patterns that should be identified in the Draft HE. As a result of critical omissions, the Draft Element is able to identify fair housing issues present in the County in vague terms, but lacks the information and insight necessary to fully examine them, fatally crippling its own analysis.
California Rural Legal Assistance, Inc.	AFFH	The Draft HE does not provide an internally consistent and accurate assessment of patterns and trends of integration and segregation of Stanislaus County's diverse communities and citizens. HCD's AFFH Guidelines specify several requirements for the FHA assessment of Integration and Segregation Patterns and Trends. The analysis must include patterns and trends related to people with protected characteristics, and must address integration and segregation to "holistically evaluate" patterns and practices and better identify and prioritize contributing factors. A strong analysis would address segregation and integration of households with lower incomes specifically, and at minimum, the analysis must touch upon segregation and integration in terms of race and ethnicity, income, familial status, and disability status. Finally, the analysis must identify which groups experience the highest level of segregation. Draft Housing Element Sections 3.6 through 3.8 attempt to address segregation and integration patterns in the aforementioned set of characteristics. Section 3.6, analyzing Race and Ethnicity segregation, claims both that "there are few areas of concentrated population by race/ethnicity in Stanislaus County" and that "the distribution of white and Hispanic majority census tracts is nearly split along Highway." The Draft Element does not attempt to reconcile these two claims. The Draft Element then notes that the "predominantly white population of the county is located east of Highway 99, specifically in the northeastern areas of the county such as East Oakdale and Hickman" while the county's predominantly Hispanic population lives "west of Highway 99 and are more densely located in the CDPs in South Modesto." No conclusions are included regarding this information, and no further context is provided for the series of maps in the following pages.28 By presenting this information in isolation, failing to provide summary conclusions, and failing to reconcile its own text's internal ambiguity, the Draft Housing Element obscures the reality of racial segregation in Stanislaus County. These same three core issues – presentation of information in isolation, failing to draw conclusions, and failing to reconcile internal textual ambiguity – pervade every section of the Integration and Segregation Analysis, in addition to every further section that will be discussed in greater detail below. No attempt is made to "holistically evaluate" the patterns of segregation described in each section, internally or taken together as an interrelated set of data. No attempt is made to identify which characteristics are the subject of the most segregation or integration. Thus, the analysis provided in the Draft Housing Element does not meet the assessment requirements outlined in HCD guidance for applying the AFFH requirements.

California Rural Legal Assistance, Inc.	AFFH	With respect to racially and ethnically concentrated areas of poverty, HCD guidelines specify that the analysis "should evaluate the patterns and changes over time and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends." Section 3.9 of the Draft Housing Element identifies five Racially and Ethnically concentrated Areas of Poverty in Stanislaus County: Airport, Rouse, Bret Harte, Empire, and Bystrom.30 There is no analysis of any pattern or change over time in these areas, nor of any past policies, practices, investments, and demographic trends that have resulted in these R/ECAP areas. Omitted from the narrative analysis (which is a paragraph in total) are a myriad of crucial facts. First, all five of these R/ECAPs are in the unincorporated pocket and island areas surrounding the southern boundary of Modesto. Airport, Bystrom, and Bret Harte are all in South Modesto/North Ceres, while Rouse is located in West Modesto and Empire is a community at Modesto's far southeastern extreme off Yosemite Boulevard. With the exception of Empire due to its remoteness, every single one of the R/ECAPs exists in an unincorporated pocket surrounded by better-resourced communities that have been annexed into the cities of Modesto and/or Ceres, leading to the strange shape of Modesto's western and southern borders. All five of the R/ECAPs are areas well known to be in dire need of infrastructure development ranging from sidewalks, storm drains, and streetlights to even basic sewer connections in some places. All five of them have been passed over for decades for investments in infrastructure, housing, and transportation. Bret Harte and Rouse are both, to this day, joint parties to ongoing settlement agreements with the City of Modesto and Stanislaus County regarding the City's and County's past discriminatory actions and policies. Earlier actions taken by the County and City under this settlement agreement included the modification of a Master Tax Sharing Agreement that had discriminatorily excluded certain predominantly Latino neighborhoods and served as an additional barrier to annexation and infrastructure funding prioritization for these communities. Most recently, Bret Harte, Rouse, and Empire also each became the beneficiaries of millions of dollars in ARPA funds for the purpose of infrastructure development. Within the past year, Bret Harte has received $10 million in ARPA funding plus an additional $2.5 million through other State sources for the purpose of the construction of state-of-the-art sidewalks and storm drainage. Rouse has also received significant ARPA funding instended to address its infrastructure needs, and Empire has received $3 million from the County's Building Community Infrastructure Fund to construct its own sidewalks and storm drainage system. These funds have been a sudden windfall in areas disinvested for decades. None of these facts are mentioned at any point in the Draft Housing Element, despite their critical importance to understanding the geographical dynamics of racially and ethnically concentrated areas of poverty in Stanislaus County and their most recent patterns, trends, and developments. Lacking this information, the analysis does not adequately describe or assess patterns over time that impact housing need and potential effectiveness of the proposed action plan.
California Rural Legal Assistance, Inc.	AFFH	The Fair Housing Assessment must also address disparities in opportunity. HCD guidelines require that the analysis "individually address access to opportunity for education, transportation, economic development, and environment" in addition to evaluating total access to opportunity.31 The guidelines go on to state: "Patterns over time should be discussed as well as policies, practices, and investments that affect access to opportunity. Local data and knowledge and other relevant factors must be considered, including incorporating public outreach and targeted community engagement." Section 3.11.1 of the Draft Housing Element identifies areas with the highest resources. The list includes the eastern communities of East Oakdale, Orange Blossom, Knights Ferry, and Hickman.33 This section also identifies Airport and Bystrom as areas of high segregation and poverty. The only conclusion drawn from these basic map readings is that "access to opportunity varies widely throughout the county."34 As already established above, no mention is made of the patterns that created high segregation and poverty in Airport and Bystrom, nor even of their status as R/ECAPs. Similarly, no attempt is made to explain why the eastern areas such as East Oakdale and Hickman have both the highest population of white residents (as described in Draft HE Section 3.6), and are the highest resource areas in the County. As in other areas of the Draft Housing Element FHA, Section 3.11 entirely fails to examine the contributing factors, patterns throughout time, or local data and knowledge that could explain these trends. The disparity between the overlap of high resource areas and predominantly white demographics in the eastern County in contrast to overlapping low resource areas and predominantly Hispanic demographics in the urbanized areas around Modesto and in the Western County speaks for itself, but is not even acknowledged in the County's analysis of disparities in access to opportunity.
California Rural Legal Assistance, Inc.	AFFH	Assessment of disproportionate housing needs and especially risk of displacement must be based on local information and must provide a realistic assessment of these risks. On analyzing disproportionate housing needs, including displacement, HCD guidelines note that "particularly important to this analysis is local data and knowledge, since some areas could be impacted by market conditions that put households at risk of displacement, or pending or upcoming planning decisions may exacerbate displacement risk."35 Disproportionate needs that should be analyzed include overcrowding, overpayment, substandard housing conditions, and displacement. Section 3.12 of the Draft Housing Element and its subsections addresses disproportionate housing needs. This section finds that Rouse, Bystrom, and Bret Harte are the areas experiencing the most egregious form of overpayment for rent; Rouse, Bystrom, and Airport are the areas experiencing the worst overcrowding; and that Bystrom, Bret Harte, and the nearby West Modesto community of Riverdale Park experience the most severe substandard housing problems. Yet despite the acknowledgement of severe housing deficiencies and inequities in several issues are most extreme in South and West Modesto communities, no attempt is made to connect these statistics together or understand their underlying contributing factors. The danger is that without this assessment, the Housing Element will adopt policies that inadvertently cause increases in homelessness and fail to remove barriers to integrated communities.

California Rural Legal Assistance, Inc.	AFFH	Careful analysis of disproportionate housing needs is particularly important in assessing possible risks of displacement, and the Draft HE does not provide adequate analysis in this arena. In addition to the general guidelines for analyzing Disproportionate Housing Needs, HCD has special rules and indicates a need for special attention to be paid to Displacement. HCD's AFFH Guidelines highlight three key mechanisms of neighborhood change that must be analyzed to understand displacement as an issue: movement of people; public policies and investments such as capital improvements and transit stops; and flow of private capital.36 One key concern is the possibility for investment driven displacement, which often disproportionally impacts people of color, lower income households, persons with disabilities, large households, and persons at-risk for or experiencing homelessness. The HCD explains that in a process that often follows decades of disinvestment, investment driven displacement can take place as a neighborhood undergoes a process of gentrification. This gentrification can arrive in the form of a flood of public and/or private sector investment which leads lead to real estate speculation, improvements in transit access, and changes in land use. These investments attract residents with higher incomes and higher educational attainments, displacing historic residents who cannot afford to remain and excluding them from any benefits of the sudden changes to their communities. In order to understand the risk of investment driven and other types of displacement, HCD suggests that the FHA must consider public infrastructure investments (e.g. transportation infrastructure improvements) and any local history of disinvestment in specific areas through exclusionary housing policies including but not limited to redlining, racially restrictive covenants, and implicitly racial zoning laws. The Draft Housing Element, in section 3.12.4, acknowledges that Airport, Bystrom, and part of West Modesto have a high or elevated displacement risk for at least one income group, and that Rouse has a high displacement risk for low-income and extreme displacement risk for very low-income households. Because of the nature and location of these risks, the omission of the aforementioned local historical knowledge regarding racially and ethnically concentrated areas of poverty in South and West Modesto is especially harmful. The neighborhoods of Bret Harte and Rouse are historically disinvested communities, and racially and ethnically concentrated areas of poverty. These neighborhoods just received a massive flood of infrastructure funding within the past year that will finally begin the process of bringing them up to annexation standards. Already, in the County's communities where ARPA funds have been allocated, conversations have begun regarding the possibility of eventual annexation. The sudden influx of funds is a textbook example of the exact investment driven displacement process described by HCD in the AFFH Guidelines. In light of these recent developments and changes in these areas, the risk factors that were already high demonstrate a genuine and immediate danger of displacement to low-income and very low-income residents of these neighborhoods. The failure to synthesize this information into its Section 3.12.4 narrative regarding displacement risk is an untenable omission, and indicates a total failure of the Draft Element to identify the fair housing issues of most pressing concern to the County and its residents.
California Rural Legal Assistance, Inc.	AFFH	In certain sections of its FHA (see, e.g., Section 3.5 (page 3-11), Section 3.13.1 (page 3-82)), the Draft Element includes narrative historical information about patterns of segregation and discrimination throughout California and even Central Valley History. While this historical perspective is welcome as a starting point for meaningful discussion, the narrative inclusions are rendered useless by two key issues. First, they are kept completely separate from all data analysis, as demonstrated in the sections above, which prevents any positive contextualizing power of the historical perspective from meaningfully affecting any conclusions the FHA has drawn to this point. And second, the analysis offered in these sections omits all information connecting specific Stanislaus County communities to the overarching historical narrative presented. All of the aforementioned specific local knowledge provided in these comments regarding the history of South and West Modesto's R/ECAPs should have been included in Section 3.13.1's local knowledge summary, but far more information from many sources across the County should have been included as well. Attaining a sufficient historical and local understanding of communities' histories requires deliberate and ongoing investment in outreach and engagement with community groups across the unincorporated county. Every community has a story, and every community's story is critical to understanding its housing and fair housing needs.
California Rural Legal Assistance, Inc.	Constraints	Once the fair housing issues have been identified and examined, the FHA must include "an assessment of the contributing factors, including the local and regional historical origins and current policies and practices, for the fair housing issues identified [in the earlier parts of the FHA]."40 These contributing factors must be considered later as part of the jurisdiction's fair housing related goals and policies (Draft Element's "Housing Plan" Section 5), to give priority to "factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance" and inform the "metrics and milestones used to determine what fair housing results will be achieved." The Draft Housing Element lists a set of Contributing Factors and gives them a prioritization ordering. (Section 3.17, Draft Element 3-109). However, absolutely no summary explanation or rationale is given for the identification of these specific contributing factors over others present in the preceding analysis. Similarly, no justification is given for prioritizing certain contributing factors over others. In light of the additional local knowledge and details provided even just in these comments that the Contributing Factors have not been properly prioritized. Listing displacement as a low priority contributing factor, for example, is deeply problematic in light of the recent massive infrastructure investments in historically disinvested and segregated communities around South and West Modesto and the potential of those investments to kickstart gentrification in those areas. Additionally, affordable housing developers such as Self-Help Enterprises have stressed that frivolous NIMBY-driven challenges have been discovered in Valley communities as a means to delay or even kill affordable housing projects, exacerbating an already difficult process. The County must completely revisit its analysis of the Contributing factors after obtaining significantly more community input, and revise the prioritization ordering accordingly.
California Rural Legal Assistance, Inc.	Constraints	Section 4 of the Draft Housing Element addresses constraints to development of housing in the County. Although Section 4 goes into sufficient detail to illustrate the regulatory constraints that justify the County's proposed rezoning, it fails to adequately identify or address the infrastructure deficits that are likely to become obstacles to the assumed housing development during the life of this Housing Element.
California Rural Legal Assistance, Inc.	Constraints	Section 4.3 attempts to address infrastructure constraints that may inhibit housing development.42 The section provides some background regarding both the hypothetical infrastructure constraint issues and specific historical examples in Stanislaus county of infrastructure constraints and how they have been handled. However, the section fails to identify specific infrastructure deficits on a site-based or even area-based level adequate to illustrate what infrastructure constraints the current set of chosen sites is facing. This omission could render estimates of housing units to be grossly unrealistic. This is a fatal flaw to the proposed plan to meet housing needs. Instead of assessing this potential problem in this section, possible infrastructure deficits are passively identified and not assessed in the Table A--Sites Inventory of the Sites Inventory. (table omitted, see page 14 of letter). As one can see, a full 261 of the more than 400 sites identified in the inventory do not have current infrastructure. Further, most of the larger sites that would be of a suitable size to contain affordable housing units lack infrastructure at this time. This is a serious obstacle to meeting affordable housing needs that must be addressed in this document.
California Rural Legal Assistance, Inc.	AFFH	Section 4.4.2 of the constraints analysis addresses risk from Earthquakes, Landslides, and erosion, but curiously omits any discussion of flood risk, despite the high number of acres in western Stanislaus county in flood plains.44 This is a key environmental constraint on an even more consistent basis than earthquakes and should not be overlooked.

California Rural Legal Assistance, Inc.	Sites Inventory	The duty to affirmatively further fair housing does not end at the Fair Housing Assessment – it extends fully and emphatically to the Sites Inventory. A jurisdiction's sites inventory "… shall be used to identify sites throughout the community, consistent with…" its duty to affirmatively further fair housing. Sites must be identified and evaluated relative to the full scope of the assessment o fair housing. To evaluate the Sites Inventory's consistency with the obligation to affirmatively further fair housing, the site inventory analysis should address both Improved Conditions resulting from siting and the Exacerbated Conditions resulting from siting, along with a consideration of local data and knowledge.46 Local data and knowledge to be captured in analysis should include current, planned and past developments, investment, policies, practices, demographic trends, public comment, and other factors such as potential for displacement of residents and infrastructure capacity.47 The analysis must ultimately address each of the fair housing issue areas: (1) segregation and integration, (2) racially and ethnically concentrated areas of poverty, (3) access to opportunity, and (4) disproportionate housing needs, including displacement. Critically, the duty to affirmatively further fair housing established in Gov. Code 8899.50 requires not only that public agencies affirmatively further fair housing, but also that they "take no action that is materially inconsistent with [their] obligation to affirmatively further fair housing." Curiously, the Draft Housing Element chose to place its analyses of Improved and Exacerbated Conditions and the fair housing issue areas in the Fair Housing Assessment instead of in Section 5 (the Sites Inventory). Table 3-15 on page 3-91 shows how many lower-income, moderate-income, and above moderate-income housing units are planned for each census tract throughout the County. Some previously identified community areas, such as Airport, Empire, and Hickman, occupy single census tracts, while others like Bret Harte, North Ceres (includes Bystrom), Oakdale, and West Modesto (includes Rouse) contain multiple census tracts. This table is the basis for all the Draft Housing Element's further discussion of the fair housing implications of its sites inventory, brief though it may be.In Sections 3.16.2, discussing Improved and Exacerbated Conditions, the Draft Housing Element summarizes the number of units at each income level have been allocated to predominantly Latino neighborhoods and R/ECAPs in South and West Modesto. This section and Section 3.16.3 seem to admit that there is a relationship in the County between low resource areas, low-income households, predominantly Latino neighborhoods, and higher rates of housing problems, but stop short of examining why the correlation exists. It does, however, posit one single solution to the issues in these neighborhoods: further development of moderate and above moderate-income units in low-resource areas. Section 3.16.2 of the Draft Housing Element argues that encouraging more moderate and above-moderate income housing in areas such as Bret Harte, Rouse, and Empire would "potentially improve conditions" by increasing the mix of income levels. This potential benefit is then, in 3.16.3, used as the justification for why the Sites Inventory "does not exacerbate conditions in vulnerable areas of the county." Section 3.16.4 presents numbers of housing units in each category allocated to the racially and ethnically concentrated areas of poverty and affluence in the county but does not provide any frame of reference for understanding the effect these sites will have on the underlying patterns that created these concentrated areas. Section 3.16.6, addressing disproportionate housing needs, completely fails to address the conclusions from Sections 3.16.2 and 3.16.3 regarding placing additional moderate and above moderate housing in low-income neighborhoods, but does acknowledge that "providing more affordable housing opportunities" in areas like Bret Harte and Rouse "may lower levels of cost burden." Critical review of the data presented in Table 3-15 demonstrates that the Sites Inventory not only fails to combat the underlying patterns of segregation in the County, but in fact, actively increases the risk of displacement for the County's most vulnerable, segregated populations, rendering the Sites Inventory as a whole materially inconsistent with the County's duty to affirmatively further fair housing.
California Rural Legal Assistance, Inc.	Sites Inventory	There are 15 census tracts classified as low resource or high segregation & poverty in the county: Airport, Bret Harte (3 tracts), Crows Landing, Empire, North Ceres (2 tracts, including Bystrom), South Ceres (2 tracts), Turlock, and West Modesto (4 tracts, including Rouse). (table omitted here, see page 16 of the letter). 944 out of the total 1,268 lower income units in the county have been allocated to these low resource and high segregation areas. Out of those 944, 608 (nearly 65%) are located in R/ECAPs alone, with an additional 211 in the "highest segregation and poverty" classified West Modesto tract 16.01, which contains the neighborhood of Spencer Marshall. At the same time as these areas have been oversaturated with lower income RHNA sites, only 164 above moderate housing units have been allocated to low resource areas. That is a mere 23% of the total above moderate housing units in the county, and it is worse than a 5:1 frequency ratio for the number of lower income units compared to the number of above moderate-income units. Low and extremely low resource areas are being forced to bear nearly all of the lower income RHNA, while receiving comparatively meager amount of above moderate-income units. From these facts alone, it is immediately clear that the Sites Inventory's approach is the opposite of desegregation and integration.
California Rural Legal Assistance, Inc.	Sites Inventory	There are 7 census tracts classified as high or "highest" resource areas in the County: Del Rio, Denair, Hickman, Oakdale tracts 1.01 and 1.02, Salida tract 5.01, and Valley Home. These areas received the following unit distributions: (table omitted here, see page 17 of the letter). With the notable exceptions of Denair and Salida's tract 5.01, there are absolutely no lower income or moderate-income units to be placed in any of the County's highest resource areas. Areas such as Hickman and Oakdale, identified throughout the document as areas with the highest racial or ethnic concentration of affluence, are set only to receive above moderate income housing units. While the potential benefits of Denair and Salida receiving a mix of housing income should not be dismissed, their impact must be properly contextualized: 263 units out of the total 1,268 lower income units distributed across the county is 20% compared to the 75% of lower income units sited in low resource areas. At the same time, 350 above moderate units out of the county total of 712 is almost 50% of the total above moderate units in the County placed in high or highest resource areas. Taking this and the previous section together, the Sites Inventory appears to very closely preserve existing areas of low and high resource by allocating disproportionately many lower income units and disproportionately few above moderate income units in low resource areas, and vice versa. Once again, this is the opposite of desegregation, and the opposite of the intention of the mandate to affirmatively further fair housing.
California Rural Legal Assistance, Inc.	Sites Inventory	There are 5 census tracts classified as "moderate resource" in the County: Diablo Grande, Grayson, Census tract 27.01 in North Ceres, Census tract 2.03 in East Oakdale, and census tract 5.10 in Salida. These areas received the following housing unit distributions: (table omitted here, see page 18 of the letter). None of these areas are R/ECAPs, and all of these areas could have seen unit allocations designed to increase a mix of household income options. Instead, the County failed to allocate any lower income housing options to these moderate resource communities at all, opting instead to heavily load nearly all of them with additional above moderate units. This will only serve to increase the disparity between the wealthiest and best resourced areas in the county and the poorest, least resourced areas by enticing higher income households to live in formerly moderate-resource areas that may have otherwise been developable for a range of income levels.

California Rural Legal Assistance, Inc.	Sites Inventory	(Table omitted here, see page 18 of the letter). This chart includes a subset of the lowest resource areas in the county that includes only R/ECAPs and the remainder of the low resource and high segregation areas around West Modesto. Bold and italics mark the three communities that are both low resource and have recently been allocated millions of dollars in ARPA and other funds for building community infrastructure, as explained earlier in these comments. By name, these neighborhoods are Bret Harte, Empire, and Rouse. Out of all the low-income neighborhoods on this list, the neighborhoods allocated the highest numbers of above moderate housing units are Bret Harte, Empire, and Rouse: there are 24, 43, and 54 above moderate-income units planned for each of them respectively. Rouse has also been allocated a remarkable 103 additional units of moderate-income housing, bringing its moderate and above moderate total to 154 units, more than any similar sum for any other community on this list. Rouse also received only 10 units of lower income housing allocation. Rouse, as has also been established earlier in the Draft HE, also happens to be the only West Modesto tract with multiple risk levels for displacement of low and very low-income residents – high risk and extremely high risk, respectively. By the Draft Housing Element's own admission, neighborhoods at such high risk stand to benefit from additional lower income housing allocation. The rationale employed by the County in Sections 3.16.2 and 3.16.3 for adding higher income housing into low income neighborhoods was its potential to alleviate segregation related housing issues. But the above moderate and moderate housing has not been distributed evenly among the low-income neighborhoods on this list, nor has it been distributed in proportion to the amount of lower income housing each area received. Rouse received among the smallest allocations of lower income units, yet the highest above moderate and moderate allocations. In contrast, areas like Spencer Marshall and Bystrom (which, coincidentally, are not set to receive huge infusions of infrastructure funding) received huge allocations of lower income housing, yet received very few above moderate income housing units. Although the County has provided no unifying rationale for their differential distribution of above moderate- and moderate income-housing to these low resource communities, it is not difficult to finish the puzzle. The County has chosen to site more above moderate housing in low resource areas that will soon receive massive infrastructure investments to encourage moderate and above moderate-income housing developers to capitalize on the incoming wave of speculation in Bret Harte, Rouse, and Empire.
California Rural Legal Assistance, Inc.	Sites Inventory	Section 5 of the Housing Element does not provide an assessment of sites with a realistic potential for development, or enough spatial analysis to allow these sites to be assessed as to their capacity to address racially segregated housing or to serve affordable housing needs, and fails to provide other required analysis. California's Housing Element Law requires that Housing Elements include: "An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing." The only specific sites identified and assessed are approved developments, none of which provide any low, very low, or severely low -income housing. No detailed analysis of low-income housing sites is included in the Housing Element. Instead of providing this level of analysis, the Stanislaus Draft Housing Element provides an inventory of more than 400 individual parcels (see Housing Element, Appendix C), most of which are less than one acre in size and thus are unlikely to be developed to include significant percentages of low or very low income housing. Instead of removing from this list those parcels unlikely to be developed due to size, or other factors, the Sites Analysis proposes to assess potential housing capacity by adding all acres and multiplying by density allowed under existing zoning to come up with the "realistic" capacity for development, allowing for a variation based on typical densities for past multifamily developments. The result is an assumed number of available housing units to meet RHNA housing units needed without any real assessment of the feasibility of development. Though this analysis would most likely result in a vast overestimate of realistic potential development, there is still a dramatic shortfall in housing. To address this shortfall, the Sites Analysis proposes to rezone 54 sites to allow for needed density, but provides no detailed information regarding whether parcels proposed for rezoning are of sufficient acreage to be realistic for development, or whether the number of affordable housing units identified is realistic. In order to provide a realistic estimate development potential in the current economic climate, CRLA conducts research with organizations routinely involved in affordable housing development. During each Housing Element cycle, CRLA contacts colleagues at AH developer Self-Help Enterprises ("SHE") to obtain feedback regarding the obstacles they experience in developing AH in the San Joaquin Valley. CRLA has taken the same approach for the 6th Cycle and has received the following feedback: Sites for AH should have a minimum parcel size of 2.5 to 3 acres, with larger parcels required if onsite storm drainage is required. Projects under 50 units are not realistic in the current AH funding environment Based on this feedback, many of the sites identified for AH in the County's sites inventory are not realistically suitable for AH development. Even within the 55 sites designated to be rezoned to provide additional housing units, 23 units are under one acre, and only 9 of the 55 sites have minimum parcel sizes of 2.5 -3 acres. Further, most of the potential development identified involves developments with fewer than 50 units, which means it is unlikely that projected development will be feasible, at least with any units contributing to low and very low income housing needs. (see Housing Element, Appendix C, Table A: Housing Element Sites Inventory). The Sites Analysis must provide some rationale and criteria for assessing whether development potential is likely on existing sites, but the current document and attached inventory does not provide the information needed to make this assessment. As such, it is inadequate as a matter of law.
California Rural Legal Assistance, Inc.	Sites Inventory	Sites smaller than half an acre are subject to their own realistic site capacity analysis. Under Housing Element Law, "a site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site." Of the roughly 400 sites listed in the Sites Inventory, 143 are under .5 acres. All sites of this size, if they are planned to be used to serve lower-income RHNA, must be analyzed under this method before they can be counted.
California Rural Legal Assistance, Inc.	Sites Inventory	In addition to small sites, sites larger than 10 acres are also subject to their own realistic site capacity analysis. Sites larger than 10 acres cannot be used to accommodate lower income housing need unless the locality can demonstrate that "sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site" or if the locality is able to present other evidence to convince HCD that it is developable as lower income housing. Although they are each technically smaller than 10 acres, the 5 sites along Tucson Avenue intended to account for the supposedly 491 lower income RHNA units in Bret Harte make up a total of 24.37 acres (Appendix 3, Table B). The close proximity of these sites, their complete emptiness, and the massive total acreage of the area, combined with the same set of sites' lack of development success under the previous housing element's zoning designation as "above moderate housing," prompt questions as to the development intentions and realistic potential of the sites taken in the aggregate. These sites should be treated as a single site for the purposes of section 68853.2(c)(2)(B), so that their potential development capacity is analyzed in depth for public and HCD review.

California Rural Legal Assistance, Inc.	Sites Inventory	For nonvacant sites, the Sites Inventory must first and foremost provide a description of the existing use of the property. 68853.2(b)(3) Secondly, jurisdictions are now required to undergo additional analysis to specify the "additional development potential" for each site within the planning period and provide and explanation of the methodology used to develop that potential.53The methodology has to consider factors including "the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use,"54 and others. An additional wrinkle to this rule applies when a jurisdiction uses nonvacant sites for over 50% of its RHNA. When this is the case, the methodology used to development potential must further demonstrate that "the existing use identified [for the nonvacant site] does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period." According to Section 5.5.2, addressing the Suitability of Non-vacant sites, the County "relies on nonvacant sites to accommodate approximately 51% of its total RHNA and approximately 68% of its RHNA for lower income households." This figure triggers the requirements of 68853.2(g)(2), under which the county must provide substantial evidence on a site-specific basis that the existing uses of the nonvacant sites will not impede additional residential development. The analysis in Section 5.5.2, though adequately describing a methodology, does not include nearly enough detail to satisfy this statutory requirement. The Sites Inventory must be revised to reflect this legal mandate.
California Rural Legal Assistance, Inc.	Sites Inventory	Where the Sites Inventory does not identify adequate sites to accommodate the need for farmworker housing, the Housing Element must "provide for additional sites to meet the need with zoning that permits farmworker housing use by right, including density and development standards that could accommodate and facilitate the feasibility of the development of farmworker housing for low- and very low-income households." Although a Farmworker Housing program is included as Program 4-2 in the Housing Plan (6-23) and Section 2.5.2 regarding Farmworker needs specifically mentions how challenging it is for Farmworkers to compete for housing57, no mention is made of Farmworkers whatsoever in the Sites Inventory. This is a significant oversight for a county as heavily agricultural as Stanislaus, and the Sites Inventory must be revised with a robust explanation of which sites are intended to be available for farmworkers. This is particularly of concern considering the low number of lower income sites allocated in areas in the rural western Stanislaus County like Grayson and Westley, both of which are known to have significant need for additional farmworker housing. If insufficient farmworker housing is determined to be available, the County will be obligated to create a program similar to Program 3-4 (6-16) guaranteeing farmworker housing by right at certain density and development standards capable of accommodating feasible low and very low-income farmworker housing development.
California Rural Legal Assistance, Inc.	Sites Inventory	Government Code section 65583.2(b)(5)(B) requires that Housing Element site inventories and analyses include assessment of whether adequate infrastructure exists to make development feasible in the planning horizon. This can either be in the form of existent infrastructure, or via inclusion in a "general plan program or other mandatory program or plan to secure sufficient water, sewer, and dry utilities to support housing development." The Sites Inventory includes more than 400 sites, 237 of which identify infrastructure as "potential." (see Appendix C, Table A). This does not meet the statutory requirement that analysis identify whether water, sewer, utilities, transportation, stormwater drainage and other infrastructure exist, and thus whether development is in fact feasible. "Potential" does not provide this analysis or help to identify infrastructure deficits. The information provided in Section 5.6 regarding the Availability of Infrastructure and Services is inadequate to explain the specific infrastructure potential of individual sites, and fails to demonstrate that General Plan or other mandatory programs are attached to every instance of a "Yes – Potential" infrastructure designation.58). More information must be included in the analysis of every individual site's infrastructure capacity.
California Rural Legal Assistance, Inc.	Sites Inventory	No digital database of the site inventory was made available for public review during the comment period. Only a PDF file was made available. Because of the failure on the part of the County to narrow down the list of parcels to those with a realistic potential for development in the HE planning horizon, a PDF file with hundreds of parcels cannot realistically be assessed by reviewers. CRLA was able to obtain the excel spreadsheet, but very late in the comment period as it was not included in the documents available for review.
California Rural Legal Assistance, Inc.	Sites Inventory	The sites inventory does not identify the geographic location of ADUs. While the Sites Analysis does not rely upon ADUs as making any contribution to low income housing, the failure to identify location or analyze socio-economic details of this housing and the communities in which it is located makes it impossible to analyze the effects of the ADUs on segregation or affordable housing in the county as a whole.

California Rural Legal Assistance, Inc.	Sites Inventory	Government Code section 65583.2(b)(4) requires that a Housing Element provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites. Guidance provided by HCD's "Housing Element Site Inventory Guidebook" further clarifies the requirement: "The housing element need only describe those environmental constraints where documentation of such conditions is available to the local government. This analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities. This information need not be identified on a site-specific basis. However, local governments will find it beneficial to describe site specific environmental conditions when demonstrating site suitability and realistic buildout capacity of each site, as these types of impediments to building must be considered when determining how many residential units can be developed on the site." The Draft Housing Element's analysis of Environmental Constraints in Section 4.4 consists of a paragraph that is shorter in length than HCD's direction regarding how such constraints should be identified. This paragraph references an "Environmental Justice Technical Report" without providing any citation, link, or indication as to where this document might be found. It was not referenced in footnotes, appendices, or elsewhere in the document. It also references the General Plan's Safety Element, which is not available. The Draft Housing Element therefore provides no real analysis or discussion of environmental justice concerns. Instead of utilizing CalEnviroScreen to identify possible Environmental Justice communities and those communities facing significant EJ concerns, the document assesses only two factors. In the Sites Analysis, the only environmental constraints addressed in detail are Wildfire and Flooding. The Housing Element must address the history of pollution burden, health risks, and environmental hazards in and around Stanislaus' County's disadvantaged unincorporated communities, and particularly Latino/Hispanic communities. We have attached a set of CalEnviroScreen Maps depicting Hazard and Cleanup sites existing in close proximity to communities in which proposed housing sites reside. As the summary chart indicates, there are significantly more cleanup sites near the low resource areas of Airport and West Modesto than anywhere else in the County, and the only Hazard site in the County is located within one mile of Bret Harte. This is but one example of the type of environmental information that should have been included in the Draft Housing Element to provide the quality of background information required by Housing Element law. The final Housing Element must include more than lip service to these critical factors in determining whether housing segregation is continuing to occur. This information is essential to any long term plan to provide equal housing opportunity or to affirmatively further fair housing in this County.
California Rural Legal Assistance, Inc.	Programs	As the final step in most Housing Element Updates, every jurisdiction must include a "program" that sets forth a schedule of actions during the planning period, each with a timeline for implementation . . . such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieves the goals and objectives of the housing element." This program to implement the jurisdiction's goals and policies should utilize the "administration of land use and development controls, the provision of regulatory concessions and incentives," and appropriate federal and state monies and subsidies when available. The Draft HE's Housing Plan (Section 6) is Stanislaus County's response to this statutory directive. Many programs described within the Housing Plan have potential, if properly administered, to create a positive difference in the lives of Stanislaus County residents. CRLA offers the following critiques of the Housing Plan to highlight aspects in which the Plan can still be improved.
California Rural Legal Assistance, Inc.	Programs	The Housing Plan is required by statute to include a component designed to "conserve and improve the condition of the existing affordable housing stock, which may include ways to mitigate the loss of dwelling units demolished by public or private action."62 68853(c)(4). The Housing Plan's Goal 1 is clearly intended to address this statutory requirement, and includes a set of policies and goals to achieve this end. However, in several cases, the policies and programs under this section do not require enough to add meaningfully to the County's existing legal duties:
California Rural Legal Assistance, Inc.	Programs	Policies 1A and 1E reiterate the County's already existing duty to enforce its own housing and building codes.
California Rural Legal Assistance, Inc.	Programs	Policy 1D requires the County to preserve at-risk units of publicly assisted affordable housing.64 However, the County previously stated at multiple points in the Housing Element that there is no publicly assisted affordable housing stock in the unincorporated county, which seems to render this Policy and Program 1-4 purely hypothetical.65 Clarification should be added to indicate if there are aspects of this Policy and Program, respectively, that the County will still be required to adhere to.
California Rural Legal Assistance, Inc.	Programs	Action 1-1a requires the county to provide housing rehabilitation assistance, but at a rate of only three households helped per year. This rate is too low.
California Rural Legal Assistance, Inc.	Programs	Action 1-1c requires only the maintenance of a pre-existing program.
California Rural Legal Assistance, Inc.	Programs	Programs 1-2 and 1-3 require the County to update local laws to comply with regulations already in place at the state level – these are legal obligations the County would have regardless of their inclusion as programs in the Housing Element.
California Rural Legal Assistance, Inc.	Programs	Since only Program 1-1 contains actions that meaningfully commit the County to preserving its affordable housing stock, additional programs should be considered to support the County's Goal #1. Some other programs that would meaningfully contribute to the preservation of affordable housing availability are as follows:
California Rural Legal Assistance, Inc.	Programs	Low-income tenant protections have proven time and again to be one of the most effective ways to preserve the existing affordable housing in a jurisdiction. Some possible programs to this effect may include: -Rent Stabilization Program (including for mobile home parks). -Good cause eviction ordinance. -Ordinance prohibiting discrimination against recipients of Section 8 and other rental housing subsidies. -Program guaranteeing a tenant's right to counsel. -Program establishing a tenant bill of rights.
California Rural Legal Assistance, Inc.	Programs	Since displacement is a high priority issue in the County, programs to prevent displacement could also be helpful here: oExpanding By Right Approval Program (3-4) to types of sites beyond those prescribed by statute. -Neighborhood Land Banking Program. -Program to proactively facilitate the purchase of at-risk properties by local nonprofit developers, community land trusts, and/or tenant organizations. -Relocation assistance program for displaced residents. -Controls on conversion or demolition for condominiums, residential hotels, and/or mobile home parks.

California Rural Legal Assistance, Inc.	Programs	In addition to the requirement to conserve and improve the condition of existing affordable housing stock, the Housing Plan is required to "assist in the development of adequate housing to meet the needs of extremely low, very low, low- and moderate-income households." One of the Housing Plan's methods of addressing this requirement is the set of programs under Goal 2. There are several good programs here – the Density Bonus Law update is a mandatory but positive step toward making affordable housing happen, the steps described in Program 2-1 to assist affordable housing developers are on point and useful, and the Housing Trust Fund, if it is actually created, will be a welcome addition to the affordable housing resources available in Stanislaus County. The only significant issue under Goal 2 is Action 2-2b, the County's plan to "discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond state law is appropriate for the County."67 Increasing the Density Bonus for market-rate projects beyond state law is impermissible under government code 65917, which states: "In enacting this chapter it is the intent of the legislature that the density bonus or other incentives offered by the city, county, or city and county pursuant to this chapter shall contribute significantly to the economic feasibility of lower income housing in proposed housing developments. In the absence of an agreement by a developer in accordance with Section 65915, a locality shall not offer a density bonus or any other incentive that would undermine the intent of this chapter. Cal Gov Code 65917." As subsequent court decisions have confirmed, 68 the statewide Density Bonus Law sets the floor of affordability – only densities above the state's prescribed limit are permissible. Action 2-2b should be removed from program 2-2, as any attempt to apply a density bonus to market rate projects would violate the intent of the legislature and the Density Bonus Law. It is not a question of what is appropriate for the County; Action 2-2b is against the law because it would undermine the law's intent of creating more affordable housing.
California Rural Legal Assistance, Inc.	Programs	The remainder of the Housing Plan contains numerous positive goals, policies, programs, and actions, many of which CRLA fully supports and would look forward to seeing implemented during the new Housing Element cycle.
California Rural Legal Assistance, Inc.	Programs	Due to inadequacies in community outreach and public engagement, the Fair Housing Assessment, the Sites Inventory, and throughout the Draft Housing Element, we strongly recommend that the Draft Housing Element be revised prior to submission to the HCD. Because of the large number of proposed rezones and the likelihood that the proposed actions will still fall short of meeting housing targets, we suggest that Stanislaus County delay finalization of the Housing Element until better site analysis can be completed that yields a more concrete proposal for achieving housing goals. The Housing Element triggers the need to revise the General Plan's Safety Element, and under SB1000, when two or more General Plan Elements are revised, an Environmental Justice Element must be prepared. Because of the history of lower income Latino housing being located in regions with the highest pollution burden within Stanislaus County, CRLA recommends development of the Environmental Justice Element concurrent with finalization of the Housing Element, as this will allow assessment of disproportionate EJ impacts on the housing sites identified.
Community Member	Sites Inventory	I want to include my property in the 6th cycle of Stanislaus county Housing Element. My property 16245 Clover Ave Patterson Ca 95363 with APN: 048-038-027 is in the county limits and within the sphere of influence of City of Patterson. 16245 Clover Ave Patterson Ca 95363 is in General AG 20 zoning with Record of Survey on the file and according to the city planner i can build between 5-8 single family homes or 12-15 Multi family units per acre. I would like to rezone my property to R3, I would appreciate if you can share the process and procedure in achieving it.
Community Services Agency	Chapters 2, 3, & 6	Page 2-31 – in the first full paragraph services offered for prevention are CalFresh and Medi-Cal. You can also add CalWORKs which is cash aid for families. CHS provides shelter, transitional housing and rapid rehousing for youth and their children, not to all individuals and families. · Page 3-78 – Missing is the Access Center Emergency Shelter, Organization is Salvation Army, 330 9th Street, Modesto, CA 95351. Total beds is 180 · Page 3-78 – CHS Hutton House address should be the same as the Navigation Center, it is no longer at 203 Jennie Street · Page 6-24 – For Program 4-3 I would add Stanislaus Homeless Alliance as a coordination point for city leaders and the County.
Department of Environmental Resources	Chapter 4	Page 171 Table 4-3: In the footnote section, the source was cited to be the zoning ordinance. However, to strengthen our case, I recommend that we also cite Stanislaus County LAMP as the LAMP is the spin-off of the State's OWTS Policy. Page 175 In the Farmworker/Employee Housing section, the following verbiage was mentioned, "The County Department of Environmental Resources is responsible for permitting, inspection, and reinspections of all employee housing, labor camps, dairy farm labor camps, and labor supply camps, pursuant to Health and Safety Code, Division 13, Part 1, also known as the Employee Housing Act, and California Code of Regulations, Title 25, Division 1, Chapter 1, also known as the Employee Housing Regulations." I recommend it gets replaced with "The County Department of Environmental Resources is responsible for permitting, inspection, and reinspections of all employee housing, labor camps, dairy farm labor camps, and labor supply camps, pursuant to Health and Safety Code, Division 13, Part 1, also known as the Employee Housing Act, and California Code of Regulations, Title 25, Division 1, Chapter 1, Subchapter 3, also known as the Employee Housing Regulations." Page 179 Table 4-5, R-A: 8,000 square feet is allowed for minimum site area. OWTS requirements are not showing for this zoning designation. Page 179 Table 4-5, SCP-R-1 to SPR-R-3, are not shown with OWTS requirements for these zoning designations.
Modesto Irrigation District	Irrigation	Del Rio • There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Swim ID – ID No. 163) that lies within the proposed property housing site parcel, APN 004-001-057. • There is an existing thirty (30) inch concrete Improvement District pipeline (Pvt Dickey ID – ID No. 358) that lies near the northeast corner of the proposed housing site parcel, APN 004-001-057.

Modesto Irrigation District	Irrigation	Empire • There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Townsite ID – ID No. 18) that crosses S. Abbie St east to west near or within the proposed housing sites. • There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Townsite ID – ID No. 183) that comes off of the ID No. 18 pipeline and heads south, east of S. Abbie St. and lies near or within the proposed housing sites. • There is an existing thirty (30) inch private concrete pipeline that travels south along the west side of S. Abbie St. • MID owns an existing thirty-six (36) inch concrete pipeline known as the Highline Pipeline that lies near or within the proposed housing sites north of Yosemite Boulevard. • There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Frazine ID – ID No. 232) that comes off MID's Highline Pipeline and heads northwest towards A St. • There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Rash ID – ID No. 187) that comes off of MID's Highline Pipeline and heads northwest towards A St. • There is an existing twenty-four (24) inch private irrigation PVC pipeline that comes off the Frazine ID pipeline and heads north along A St. • There is an existing sixteen (16) inch private irrigation concrete pipeline that comes off the Rash ID pipeline and heads west.
Modesto Irrigation District	Irrigation	Southwest Modesto • MID owns an existing sixteen (16) inch mortar lined steel domestic water transmission pipeline that travels in the south to north direction along Sutter Ave. • MID owns an existing thirty (30) inch concrete pipeline known as the Wooten Ditch Pipeline that lies near or within the proposed housing sites in the southwest Modesto area. • There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Rogers ID– ID No. 44) that comes off of MID's Wooten Ditch Pipeline and heads west towards Colorado Ave. • There is an existing sixteen (16) inch concrete Improvement District (ID) pipeline (Rogers ID – ID No. 44) that comes off of MID's Wooten Ditch Pipeline and heads west towards Colorado Ave. • There is an existing twenty (20) inch concrete Improvement District (ID) pipeline (Wooten Ditch ID – ID No. 142) that branches off of MID's Wooten Ditch Pipeline in two (2) separate locations. • There is an existing thirty-six (36) inch abandoned in place pipeline that lies near or within the vicinity of the proposed housing sites (Wooten Ditch ID – ID No. 142). • MID owns an existing sixteen (16) inch mortar lined steel domestic water transmission pipeline that travels in the south to north direction along Martin Luther King Dr. • MID owns an existing forty-two (42) inch concrete pipeline known as the Briggs Ditch Pipeline that lies along Briggs Ditch St near or within the proposed housing sites in the southwest Modesto area. • There is an existing twenty-four (24) inch concrete Improvement District (ID) pipeline (Briggs ID – ID No. 227) that comes off MID's Briggs Ditch pipeline. • There are two (2) existing sixteen (16) inch concrete private irrigation pipelines that come off the Briggs Ditch pipeline and head west.
Modesto Irrigation District	Electrical	High voltage is present within and adjacent to the project area. This includes 115,000 & 69,000 volts overhead transmission, 12,000 volts overhead and underground primary, 6,900 volts underground primary, as well as overhead and underground secondary facilities and overhead fiber optic cable. Use extreme caution when operating heavy equipment, using a crane, ladders, scaffolding, handheld tools, or any other type of equipment near the existing MID electric lines and cables. Workers and equipment should always maintain a distance no less than 10 feet from overhead facilities. Assume all overhead and underground electric facilities are energized. • Existing MID easements for protection of overhead and underground electrical facilities are to remain. Overhead secondary cable is protected by a minimum 20' wide easement centered on the overhead cable. Overhead primary cable is protected by a minimum 30' wide easement centered on the overhead cable. Underground secondary cable is protected by a minimum 5 foot. wide easement centered on the underground cable. Underground primary cable is protected by a minimum 10 foot. wide easement centered on the underground cable. • MID easements for protection of overhead and underground electrical facilities are required. MID overhead secondary cable shall be protected by a minimum 20' wide easement centered on the overhead cable. Overhead primary cable shall be protected by a minimum 30' wide easement centered on the overhead cable. MID underground secondary cable shall be protected by a minimum 5 foot. wide easement centered on the underground cable. MID underground primary cable shall be protected by a minimum 10 foot. wide easement centered on the underground cable. When underground cable is not located in the Road Right of Way or within the PUE along the street frontage a MID easement is required to protect the existing underground electrical facilities and maintain necessary safety clearances. • The existing electric service may not be adequate for the proposed project development. Prior to any construction a full set of construction plans must be submitted to Electrical Engineering Design Group. • Due to supply chain disruptions beyond MID's control, please contact Modesto Irrigation District at (209) 526-7337 or (888) 335-1643 and ask for the Electrical Engineering Design Group to coordinate project/cost requirements.

Salida Resident	Chapter 4	The following government statue guides the county as to which sites should be included in the final inventory. *Gov. C. 65583(a)(3)An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing.* Section HE-62 of the adopted 5th cycle Housing Element includes the zoned residential land encompassed in the Salida Community Plan. However, in the draft 6th cycle, this land has been removed from the draft "due to the inability to advance infrastructure development over the previous Housing Element Cycle." (Page 4-36) The county should reject removing or "demoting" the Salida Community Plan from the draft. Domestic water infrastructure for the Salida Community Plan is dependent on the City of Modesto's Water Master Plan. Progress on reaching an agreement for the City of Modesto to supply water to the Salida Community Plan will only be achieved after Modesto adopts a new General Plan and subsequent Water Master Plan update. The City of Modesto is currently on pace to adopt a new General Plan by 2026. An update Water Master Plan should be adopted shortly thereafter. The infrastructure issues for the Salida Community Plan could be resolved within the 6th cycle's timeframe. (Prior to 2031) In section 4.1.1 of the 6th cycle draft, there is a discussion of the "Salida Community Plan". The penultimate paragraph on page 4-5 discusses the need for CEQA compliance. *Development in the SCP is still required to undergo CEQA analysis, and Infrastructure to serve the amendment area of the Salida Community Plan is unknown and has not been evaluated, discussed further in Section 4.3, Infrastructure Constraints. Under Program 2.1g, the County would explore funding for CEQA review for the Salida Community Plan to facilitate housing development.* We are encouraged that the County would explore partnering with the City of Modesto and the landowners to solve this vexing issue. Please give a clearer explanation of where to find the language contained in Program 2.1g. I cannot find it in the document.
Self-Help Enterprises	AFFH	It is imperative that cities and counties include as many high or highest resource sites as possible in their Housing Element site inventory. The ratio of these sites to other lower resource sites should be 1:1. The City/County should overlay the high opportunity zones on the housing inventory map to determine sufficient high opportunity sites are included and/or identify additional high opportunity sites to be included in the site inventory. This should be done in accordance with the 2023 California Tax Credit Allocation Committee and the Department of Housing and Community Development Opportunity Mapping Methodology to promote access to
Self-Help Enterprises	Sites Inventory	We encourage City/County partners to adopt a program to review all surplus property within one year of adoption of the Housing Element and make those sites available for the development of affordable housing. There are provisions in the Surplus Land Act (SLA) which allow for an expedited process for sites that qualify as "exempt surplus land" which is land determined by a local agency and verified by HCD and allows for streamlining the process for disposing of land for affordable housing. There are currently scoring incentives for funding affordable housing on surplus sites and it is imperative these sites be identified quickly and made available
Self-Help Enterprises	Programs	Increasingly, we have found it expedient to utilize "by right" pathways to project approvals through density bonus law, SB 35 permit streamlining, and the Housing Accountability Act. Frivolous and NIMBY-driven CEQA challenges have been "discovered" in valley communities to delay and sometimes kill projects. It is imperative that cities and counties ensure their ordinances and local practices do not conflict with such streamlined processes. Requirements for Conditional Use Permits in
Self-Help Enterprises	Programs	feasibility for development. Suitable sites must include: a. Sewer, water, and dry utilities proximate to the site in question, without a need for upsizing or significant offsite development. b. A significant portion of the available acreage in the adequate sites inventory (at least 50%) should have minimum parcel sizes of 2.5 to 3 acres (and larger if onsite storm drainage is required.) c. Reasonable densities. In most valley communities' reasonable densities are 20-50 units per acre, and projects below 50 units are generally not feasible in today's funding environment.
Self-Help Enterprises	Programs	The City/County should consider adding a program to revise its zoning ordinance to add Manufactured Home on a Permanent Foundation to be allowed in all zones that allow singlefamily residences. The City/County should allow this in the identified zones without requiring a discretionary approval process
Self-Help Enterprises	Programs	The City/County should consider a fee waiver program for projects that include 100% affordable housing serving households below 80% of area median income. If the City/County is unable to waive fees, we strongly encourage deferral for a period not to exceed 30 years with the deferral recorded as a form of deferred note and secured by the property for affordable single-family housing development and 55 years for affordable multi-family housing development. The note would be due and payable if the property were sold, refinanced, or the rent is no longer affordable (with multifamily properties), or is no longer occupied by the owner (single-family
California Rural Legal Assistance, Inc.	Outreach	To compensate for previous failures, the County must allow at least two months for this outreach to take place: the effective outreach strategy could include (1) canvassing in specific low-income communities to alert residents of an upcoming community meeting, (2) holding a community education meeting on the Housing └ Element and community-specific details related to sites and programs, with information distributed in physical handouts for resident attendees, (3) a second community meeting a month later to gather feedback once residents have had time to digest the information they learned, and (4) incorporation of the feedback
California Rural Legal Assistance, Inc.	Housing Needs	In the section on ELI households, the County provides only a short analysis of cost burden experienced by ELI households in Stanislaus County compared to the rest of the state. Additionally, this earlier section includes figures that appear to contradict the data in ELI household section (Page 2-19, 2-20, Table 2-22: "Seventy-nine precent of extremely low-income households experience a cost burden, while only nine percent of households making above 100 percent AMI experience cost burden." See, contra, 2-30, "86.4 percent of ELI households have either a moderate or severe housing cost burden."). In addition to this discrepancy, the data in Table 2-32
California Rural Legal Assistance, Inc.	Housing Needs	There is no analysis regarding other factors that HCD recommended the County analyze, including overcrowding, displacement risk, or housing stock quality on ELI households.
California Rural Legal Assistance, Inc.	Housing Needs	Despite the County's admission that ELI households often overlap with other populations with special housing needs such as seniors and people with disabilities, no attempt is made to characterize or analyze the compounded impact on residents at the intersection of these populations.

California Rural Legal Assistance, Inc.	Housing Needs	In its analysis of Housing Age and Conditions, the County most recently added a section addressing that housing conditions tend to be worst in older neighborhoods such as Airport, Empire, North Ceres, West Modesto, and Crows Landing, among others – however, this section draws no link between the R/ECAP status of several of these neighborhoods, the percentage of ELI households within them, and the age of the housing stock in these areas.
California Rural Legal Assistance, Inc.	Housing Needs	In addition to their overlap with seniors, people with disabilities, farmworkers, and other special housing needs populations, ELI households are disproportionately more likely to fail to receive the benefits of county programs due to impediments such as geographical isolation and language access barriers. ELI households are often simply more difficult to reach, which in the case of already limited outreach done by the County most often means there will be fewer opportunities for ELI households to even find out about available county programs. Analysis of these compounding risk factors is missing from this section.
California Rural Legal Assistance, Inc.	Housing Plan	Some programs that the County could add to help address the needs of ELI households but has chosen not to include: 1. Rent stabilization to address displacement risk for ELI communities. 2. An Inclusionary Zoning ordinance to ensure the creation of affordable housing with any housing development during the planning period. 3. A Rental Safety Inspection Program akin to the City of Modesto's program of the same name to address habitability issues experienced by ELI individuals living in substandard housing conditions.
California Rural Legal Assistance, Inc.	Housing Needs	HCD's November 2024 Letter asked the County to provide additional analysis of the geographical distribution of the 596 houses identified as needing rehabilitation or replacement in order to identify areas with disproportionately greater housing rehabilitation and replacement needs. While the County did not appear to add any additional geographical analysis to answer this specific question, the County did include a list of areas in the county with a higher number of old houses that are more likely to need rehabilitation and replacement. A more illuminative analysis would specific data on the affordability and ownership status of the problematic housing stock in the areas identified and analyze trends for areas also classified as high segregation, low opportunity, and/or R/ECAPs. The County should include analysis of
California Rural Legal Assistance, Inc.	AFFH	The County has made significant improvements to the Fair Housing Analysis' level of detail and local history. Unfortunately, these additions have not been sufficient to produce a Housing Plan that affirmatively furthers fair housing. The County still omitted several pieces of important information relevant to R/ECAPs from its analysis, and the positive additions the County did make were not accompanied by meaningful changes to the County's priorities, policies, or programs.
California Rural Legal Assistance, Inc.	AFFH	The County reports that the stakeholder interviews it held indicated instances of housing discrimination towards undocumented persons, persons with disabilities, non- native English speakers, large households, and those with past experiences with the criminal justice system. Given these findings, it prompts the question of why no testing has been done since 2016; however, the County does not explain why no testing has occurred.
California Rural Legal Assistance, Inc.	AFFH	**Rouse-Colorado.** The County claims that a sewer project in Rouse Colorado is "in progress." It is true that such a project is part of the multiphase plan the County began to implement in 2011 to meet its obligations under the CCCI Settlement. However, the phrase "in progress" is ambiguous and may be misleading given the current state of progress on the Rouse-Colorado sewer system, specifically. The County has been attempting to install sewers across West Modesto as part of their CCCI settlementrequirements for over a decade and has experienced compounding delays, many of them through no fault of the County. Information gathered by CRLA in previous conversations with County staff indicated that the West Modesto sewer project is intended to be implemented in phases beginning with the Spencer-Marshall neighborhood and only later to reach Rouse-Colorado. It is possible that the ARPA funding made available to improve Rouse-Colorado's infrastructure is being used to augment the West Modesto sewer project – however, this is not stated in the discussion of Rouse Colorado's infrastructure conditions. **Airport.** For over a decade, Airport neighborhood has been subjected to a continuous pattern of industrial encroachment by Gallo Glass Inc. – with rezoning applications regularly approved by the County Planning Commission – at the cost of available housing stock for neighborhood residents. The County has omitted any mention of this continued pattern of expansion from the Housing Element, but residents of Airport are aware and have complained to the County on numerous past
California Rural Legal Assistance, Inc.	Programs	The County has failed to draw the connection wherein R/ECAPs, their racial demographic characteristics, and their lack of infrastructure and housing investment are the product of systematic, discriminatory exclusion by the County, capable of redress via Housing Element policies. the highest priority contributing factor identified by the county is the need for public and private investments in specific neighborhoods. the County could develop and implement programs designed to help specific disadvantaged neighborhoods with specifichousing related problems
California Rural Legal Assistance, Inc.	Housing Resources/Housing Plan	The County has allocated 83% of its low-income housing units to areas that already have high levels of segregation and low access to opportunity. The County's failure to create appropriate infrastructure to accommodate lower income housing in more affluent areas does not, and cannot, negate the County's duty to affirmatively further fair housing.
California Rural Legal Assistance, Inc.	Housing Resources/Housing Plan	The Sites Inventory, in its current form, includes an impermissible, segregation-perpetuating distribution of lower income RHNA sites to underinvested, disadvantaged communities. The County can and must create policies and programs that will counteract the increase of segregation in these communities strongly enough to outweigh the effects of the lower income RHNA allocation to those neighborhoods
California Rural Legal Assistance, Inc.	Housing Resources/Housing Plan	In the County's allocation of RHNA units to Bret Harte, Rouse-Colorado, and Airport, all or a significant portion of the RHNA allocation is deeply dubious due to the infrastructural resources and recent historical background of these three areas
California Rural Legal Assistance, Inc.	Housing Resources	The County has assigned 481 units of low-income housing allocation to the neighborhood of Bret Harte, a R/ECAP. No justification is provided to explain how a housing development of this magnitude is feasible in this set of parcels, nor examples provided of recent housing development successes at a similar size and density.
California Rural Legal Assistance, Inc.	Programs	Rouse-Colorado currently lacks sewers and pedestrian infrastructure. In order to justify the placement of any additional housing units in Rouse Colorado, the County must provide some assurance that sewer will actually be installed to enable this housing development.

California Rural Legal Assistance, Inc.	Housing Resources	The County has failed to analyze or disclose this pattern of encroachment by Gallo Glass Inc. into the Airport neighborhood, and the potential environmental hazards it poses to residents. In the Sites Inventory, to justify the realism of siting units in Airport, the County must first describe and analyze this pattern. If, following that analysis, the County still does choose to place housing units in the Airport neighborhood, they must include programs in the Housing Plan to ensure that the resident of the Airport neighborhood are not exposed to environmental hazards posed by Gallo Glass' continuing expansions, that existing housing is preserved and the current
California Rural Legal Assistance, Inc.	Programs	**1. Action 3-9b**, which required the County to "assess and prioritize the infrastructure needs of underserved communities"44 on a continuous basis, is only as effective as the "infrastructure prioritization studies" it references as its basis. These infrastructure prioritization studies could be explained in further detail and embued with a commitment to an equitable, transparent prioritization methodology that the public can engage with and understand. **2. Action 3-9c**, which commits the County's portion of HUD entitlement funding for sewer and water infrastructure projects like the West Modesto Sewer project,45 is a great start. However, in order to ensure that these projects are actually completed within the planning period, additional sources of funding available on a regular basis could be committed to these projects that have languished in the pipeline for years. **3. Action 3-9h**, committing the County to "continue to seek grant funding to construct infrastructure improvements,"46 does not add anything to what the County should already be doing. This action would more effectively help disadvantaged communities if the County more explicitly tied it to priority projects identified in the priority project list referenced in action 3-9j. **4. Action 3-9j**, which would revise the County's infrastructure priority project list as infrastructure projects are completed,47 has the potential to be a useful addition
California Rural Legal Assistance, Inc.	Environmental Justice	The issues faced by R/ECAPs in Stanislaus County present ideal opportunities and case studies to develop the types of policies and programs required by SB 1000. Yet the County has almost completely failed to consider adopting policies relevant to SB 1000's requirements to address the issues faced by R/ECAP communities.
Valley Improvement Projects	Outreach	Valley Improvement Projects (VIP) is a grassroots Environmental Justice organization founded in 2012. We are based in Stanislaus County and our focus is to empower local communities through sustainable development and environmental stewardship. Our mission revolves around creating equitable opportunities for economic growth, community development, and environmental conservation in the Northern San Joaquin Valley. I am submitting a comment on behalf of VIP for the 3rd Draft of the Stanislaus County Housing Element Update. For the record, we have concerns about the level of community engagement and the programs outlined in the Housing Element Update. The current draft remains too general, and we strongly recommend that the program actions be more comprehensive, with specific details added to
California Rural Legal Assistance, Inc.	Site Inventory	The County proposes to use 5 sites that would provide 481 units of low-income housing. While no individual site larger than 10 acres is proposed in Bret Harte, the 5 sites proposed are adjacent to each other and total 24.37 acres. In essence, these proposed sites will have significant infrastructure and service needs similar to that of a single 24-acre site. We are concerned about the County's proposal to site additional housing units in Bret Harte without justification, especially as this lower-resource community is already suffering under infrastructure and service constraints. Adding almost 500 units next to one another will overburden the limited infrastructure in Bret Harte, including schools, public transportation, sidewalks, and sewage systems. We are also concerned about the County's proposal to place 44% of its low-incomehousing units required in the County's regional housing needs allocation (RHNA) in effectively one 24.37-acre parcel, in one lower-resourced community that the County also designates as a R/ECAP. The County has not provided any reasoning as to why it is making this proposal instead of proposing low-income units elsewhere in the County, and the County has not discussed how this could be feasible especially given the lack of infrastructure in Bret Harte. The County has not provided any reasoning as to why it is making this proposal instead of proposing low-income units elsewhere in the County, and the County has not discussed how this could be feasible especially given the lack of infrastructure in Bret Harte. We urge the County to justify this proposal and explain how the County will feasibly accommodate so much low-income housing in such a concentrated area.
California Rural Legal Assistance, Inc.	Site Inventory	As it is currently proposed, the Sites Inventory violates three state laws and one federal law. First, the County violates California Government Code Section 8899.50. Section 8899.50 requires all California housing elements to affirmatively further fair housing (AFFH). The duty to AFFH means that public entities must take affirmative steps to end segregation and create integrated communities of opportunity. Unfortunately, Stanislaus County has not, through its Sites Inventory, taken the proper affirmative steps, of zoning for low-income housing predominantly outside of R/ECAPs, to end segregation and create integrated communities of opportunity. Second, the County violates the Fair Employment and Housing Act (FEHA). The County has violated the FEHA by creating a discriminatory effect through its Sites Inventory. Third, the County violates California Government Code Section 65008. California Government Code Section 65008 requires the County not to discriminate in its zoning. Finally, the County has also violated the Federal Fair Housing Act (FHA) through its Sites Inventory. It has violated the FHA under a claim of segregative effect.
California Rural Legal Assistance, Inc.	Site Inventory	The County is perpetuating historic patterns of segregation by maintaining the same pattern of where it has zoned for low-income housing and where it has zoned for abovemedian income housing, in the past. The zoning pattern the County has used in the past has served to create segregated communities for at least the past thirty years. By keeping effectively the same zoning pattern, the County will only perpetuate and make worse the patterns of segregation. The County does not appear to make an effort to integrate communities by allocating a fairer distribution of low-income housing units in high-resource areas, and vice versa.
California Rural Legal Assistance, Inc.	Site Inventory	The County's zoning practice not only perpetuates segregation, but it does not allow the R/ECAPs to become integrated areas of opportunity because it keeps above-median income housing out of R/ECAPs. There needs to be a mix of housing values in communities to properly create integrated communities, due to the racial and ethnic wealth disparities created by years of differential treatment. Housing in different income brackets also creates opportunities because it increases the total wealth of a community. The County has kept a stark divide between affluent areas and R/ECAPs by not effectively integrating its zoning.

California Rural Legal Assistance, Inc.	AFFH	**Rouse/Colorado:** The County acknowledges that the Rouse/Colorado neighborhood has significant affordability and overcrowding issues, as well as the highest displacement risk in Stanislaus County. Specifically, the County states that low-income residents are at high risk of being displaced, and very low-income residents are at extreme risk of being displaced, in Rouse/Colorado. While the County recognizes that residents of Rouse/Colorado face dire affordability, overcrowding, and displacement issues, the County has failed to adequately capturing these needs in its current draft. Alarmingly the City of Modesto is considering building a new soccer stadium over the former golf course. As stadiums are notorious for causing higher rent prices, gentrification, and displacement, this proposed stadium would not only restrict residents' ability to recreate, but it would also increase the risk of gentrification and displacement in the neighborhood.41 Despite planning for the soccer stadium in Rouse/Colorado, the County has omitted this significant proposal in its Housing Element update. **Airport:** The County has consistently and without fail approved all of Gallo's rezoning requests to convert Airport's residentially zoned parcels to industrially zoned land where Gallo can develop warehouses and parking lots. This encroachment can only serve to increase the neighborhood's pollution burdens, displacement risks, and level of segregation. Ultimately, the County has failed to include local data and trend that Gallo Glass Company and other industrial facilities have and continue to edge out low-income families, while subjecting remaining families to environmental burdens and ongoing displacement risks. The County must include this information and create programs to remedy this concerning pattern. Specifically, the County must preserve remaining residentially zoned parcels in Airport while mitigating any environmental impacts that could occur from any expansion of Gallo's warehouses or other facilities and activities. If the County approves any additional rezoning, it must make up the lost residential units by relocating existing residents or siting residential units, including affordable units, elsewhere in the County. **RCAA:** The County acknowledges that areas like East Oakdale, Valley Home, and Orange Blossom contain predominantly white populations with higher median household incomes and are considered racially or ethnically concentrated areas of affluence (RCAAs).54 However, the County has failed to provide information about patterns and trends that have resulted in RCAAs in these communities.
California Rural Legal Assistance, Inc.	Constraints	the County has failed to and must discuss environmental constraints, including environmental burdens and hazards due to natural disasters and human activities. The County is aware of but conducts no analysis of the hazards posed to unincorporated neighborhoods near industrial factories and warehouses, such as the Airport neighborhood. There is also no discussion of the potential pollution burdens posed to sites along the Crows Landing corridor, which contains a significant number of body shops and heavy automotive commercial industry. And there is only a passing mention of the concentrated pollution burdens experienced by communities adjacent to the Highway 99 corridor such as Riverdale Park Tract, Rouse Colorado, Bystrom, Airport, and Empire. The County also does not discuss water contamination as an environmental constraint even though safe drinking water is a basic tenet of safe housing. In fact, the County proposes to put future residents in harm's way in the community of Keyes, a community that faces severe drinking water contamination issues. We believe the County may be underestimating the issues drought could bring to water availability in unincorporated areas, particularly considering the current state of water availability in Diablo Grande. Programs could include the incorporation of water systems or planning and development of new water systems in coordination with the Central Valley Water Board. Another way of identifying and addressing environmental constraints in disadvantaged or affluent areas is by creating and implementing environmental justice policies or an Environmental Justice Element in the General Plan.
California Rural Legal Assistance, Inc.	Public Participation	We are happy to see that the County conducted additional community engagement sessions in April and May of 2025: with the communities of Airport, Grayson, Parklawn, Rouse/Colorado, South Modesto, and West Modesto. We would like to see the County include more communities in their participation. By only meeting with the above communities once, the County may not have enough information to ensure the Housing Element Programs are sufficient to meet the needs of each community.
California Rural Legal Assistance, Inc.	Public Participation	Without considering and incorporating public input on the Housing Element process, the County will be unable to respond effectively to the needs of the community and will fail to substantially comply with its legal requirements.
California Rural Legal Assistance, Inc.	Public Participation/ Housing Plan	First, there should be a rent stabilization ordinance implemented by the County. Second, there are little additional protections provided to those being evicted, despite the fear of eviction in Rouse/Colorado and other low-income communities being obvious. We recommend the County do more to protect those being evicted. Programs that would help ease people's fears and protect evictees could include: a just cause eviction ordinance as is present in Los Angeles, or a tenant right to counsel program which already exists in several major cities inside and outside of California. Thirdly, we recommend that the County adopt a rental registry and rental safety inspection program, and that the County put additional resources into code enforcement (e.g., hire additional code enforcement officers), to fully address the concerns of residents. Finally, we believe the County could do more to address the public's concern about the cost of utilities and homeowner insurance. CRLA recommends four programs to address the need for more assistance in renting and homeownership: utility payment assistance, permanent rental assistance, insurance consultation for low-income homeowners, and more opportunities for financial planning trainings.
California Rural Legal Assistance, Inc.	Housing Plan	First, the County includes June 2025 as a deadline for several actions; June 2025 has passed, and this deadline must be updated accordingly. The County should update the timelines, or include the results, of program actions: 1-1e, 1-2a, 3-1a, 3-1c, 3-1e, 3-1h, 3-3a, 3-5a, 3-6c, 3-6d, 3-6e, 3-6f, 3-6g, 3-6I, 3-6j, 3-7e, 3-7f, 3-7g, 3-8b, 4-1a, 4-1b, 4-1c, 4-1e, 4-2c, 4-3e, and 4-4c.
California Rural Legal Assistance, Inc.	Housing Plan	Program Action 1-2a indicates the County will determine if it is necessary to amend the County Code to be in compliance with California Health and Safety Code Section 17970.5.67 It is necessary to amend the County Code to be in compliance with Health and Safety Code Section 17970.5 because compliance with Section 17970.5 is a legal obligation. Therefore, the County must make a more specific commitment to amending its code. Further, the County must also update its code to reflect the requirements of California Health and Safety Code Section 17970.7.
California Rural Legal Assistance, Inc.	Housing Plan	In order to ensure that existing residents in Airport, Rouse/Colorado, and other vulnerable neighborhoods are protected from displacement and can relocate regardless of the type of development, the County should expand this program to include other developments. Specifically, we propose the following revision in red: "This program is intended to support the preservation or acquisition of restricted affordable units and unrestricted affordable units that could potentially convert to market-rate units and other developments during the planning". Additionally, we urge the County to revise Action 1-4a accordingly: "Action 1-4a: Monitor the status of any deed-restricted and unrestricted affordable units built in the unincorporated County. If any at-risk units are identified, the County will complete actions 1-4b to 1-4f". Finally, we urge the County to perform Action 1-4a not just annually but also as proposed developments are being considered by the Planning and Community Development Department, in order to truly take proactive actions to protect existing residents from displacement at the first instance. Therefore, the County should revise the Objective and Timeframe Section of Action 1-4a to: "Annually and as project proposes are considered by the Planning and Community Development Department".

California Rural Legal Assistance, Inc.	Housing Plan	We would, however, like to see the County add specific language about helping first time homebuyers into the program, to ensure that the program is sufficiently focused on a specific objective.
California Rural Legal Assistance, Inc.	Housing Plan	instead of “advocating” for the inclusion of a bonus for projects in lower-resource areas, the County should simply require that the fund include providing a bonus for affordable housing units in lower-resource areas.
California Rural Legal Assistance, Inc.	Housing Plan	We urge the County to augment the actions under Program 3-1 with a commitment to adopting an inclusionary zoning policy requiring developers to set aside a fraction of newly constructed housing units to be affordable to lower-income households. Adopting an inclusionary zoning ordinance would help to ensure that an adequate number sites would be developed for low and very lowincome County residents and represent a strong step toward affirmatively furthering fair housing.
California Rural Legal Assistance, Inc.	Housing Plan	As the program stands currently, it makes no specific commitment to enforcing the Health and Safety Code in farmworker housing. The program in its current state only states the goals of discovering whether there are habitability issues in farm working housing. We appreciate that the County wants to make further findings alongside UC Davis about habitability issues, pursuant to AB1654, but the County needs to make a specific commitment to enforce habitability after those findings are made. Alongside this specific commitment, the County needs a discrete timeline as to when it will begin code enforcement in farmworker housing, to combat the habitability issues.
California Rural Legal Assistance, Inc.	Housing Plan	To alleviate the homelessness crisis and help end segregation, the County should decrease the amount that rent is allowed to be increased on a yearly basis. This ordinance should also apply to mobile-home owners as they are often lower-income.
California Rural Legal Assistance, Inc.	Housing Plan	We recommend that the County implement a program that gives tenants the right to counsel in eviction proceedings. At a minimum, Stanislaus County should investigate its ability to create a program which will require legal representation for low-income households facing eviction.
California Rural Legal Assistance, Inc.	Housing Plan	We urge the County to encode an expanded version of the CARES Act requirement for a thirty-day notice to vacate, in a program. This will hopefully help to reduce the homelessness crisis.
California Rural Legal Assistance, Inc.	Housing Plan	The County should continue to examine potential funding sources for a first-time home buyer program. We are aware the County has continued a similar program: Program 2-4. We recommend that the County more explicitly state that it will help first-time home buyers in Program 2-4
California Rural Legal Assistance, Inc.	Other plans	In the May 9, 2025 comment letter submitted by the Environmental Justice Bureau (Bureau), the Bureau points out that the County has failed to and must update its SB 244 analysis, which is required each time it updates its Housing Element. We agree and urge the County to do so in order for it to have a current and accurate understanding of the infrastructure and services needs of disadvantaged unincorporated communities. Additionally, the County has failed to and must update its Climate Adaptation Plan in the Safety Element because of its revision to the Housing Element. Finally, we are concerned that the County still does not comply or attempt to comply with SB 1000. SB1000 requires the County to incorporate an Environmental Justice (EJ) Element or environmental justice policies throughout its General Plan when two or more elements are being updated at the same time.110 The County has clarified and added additional programs involving Environmental Justice, but that is not sufficient and still does not meet the requirements of SB 1000. We continue to urge the County to adopt an EJ Element or create comprehensive environmental justice policies to ensure that policies and programs in the Housing Element and other parts of the General Plan do not disproportionately negatively impact disadvantagedcommunities and address environmental hazards facing these communities.
Burbank Paradise Fire Department	Programs	As a Fire Chief in a Mix of incorporated / unincorporated area of Stanislaus County, I am writing to express urgent concern that the Draft 6th Cycle Housing Element fails to address the critical issue of fire protection capacity. The rezoning of parcels to allow for higher-density housing in unincorporated communities like Bret Harte, Crows Landing, Empire, and West Modesto must be matched with a corresponding increase in funding to the independent Fire Districts that protect these residents. Without a mechanism to allocate a fair share of County-collected property and sales taxes to the Fire Districts serving these areas, this plan will significantly burden response times, staffing levels, and public safety. We ask that Stanislaus County: 1. Include a detailed fiscal plan for how Fire Districts will be supported to meet projected service demands. 2. Commit to reevaluating property tax sharing agreements with Fire Districts serving rezoned communities. 3. Include fire protection infrastructure, staffing, and ISO ratings as a required compon+C129ent of housing planning in disadvantaged communities. Growth must be safe, responsible, and equitable. We ask that you support your local fire agencies in meeting this challenge head-on.
Burbank Paradise Fire Department	Programs	Please ensure that all new housing in Stanislaus County is required to comply with proper safety setbacks and defensible space standards. California law (PRC §4291) already establishes a 100-foot defensible space for wildfire safety, yet current county zoning and building codes do not consistently apply this distance to new home construction. I urge the County to strengthen its standards by requiring at least a 100-foot setback/clearance for new housing wherever feasible. This would not only improve public safety and wildfire resilience, but also benefit the community by ensuring larger lots, reduced risk to residents, and greater protection for first responders.
California Rural Legal Assistance, Inc.	AFFH	Cal. Gov. Code section 8899.50 obligates the County to Affirmatively Further Fair Housing (AFFH). The duty to AFFH means that public entities must take affirmative steps to end segregation and create integrated communities of opportunity. The County must also comply with other fair housing laws including the federal Fair Housing Act, California’s Fair Employment and Housing Act, and California Government Code section 65008. Among the County’s duties under these laws is the duty to avoid taking actions or creating housing policies that result in a discriminatory or segregative effect.
California Rural Legal Assistance, Inc.	Sites Inventory	As we have expressed in previous comments, the County’s current Sites Inventory disproportionately sites a significant majority (81%) of its low- and very low-income housing in the County’s Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) and areas of high segregation and poverty. The concentration of low and very low-income housing units is highest in the R/ECAP of Bret Harte, which alone received 45.7% of the County’s total low and very low-income housing unit allocation in five heavily concentrated parcels on the outer edge of the neighborhood. At the same time, most of the County’s Racially Concentrated Areas of Affluence (RCAAs) and high and highest resource areas received no low- or very low-income allocation. The overall impact of this distribution will be the exacerbation of the County’s existing patterns of segregation. The current Sites Inventory thus violates the County’s duty to affirmatively further fair housing, rendering the Housing Element noncompliant with state and federal fair housing law.

California Rural Legal Assistance, Inc.	Sites Inventory	Since we submitted our last comments, we have appreciated the County's willingness to meet with us to discuss possible changes and improvements to the Sites Inventory and share the data used to prepare it. Using the data the County provided, we have identified several sites in high resource areas of the County that we believe could be rezoned to accommodate a larger percentage of low and very low-income housing units. In particular, we recommend rezoning certain sites in Denair and reallocating low-income units from Bret Harte to Denair to enable a better mix of housing types in both communities and provide a less segregative alternative to the County's current Sites Inventory.
California Rural Legal Assistance, Inc.	Sites Inventory	Bret Harte contains a disproportionate allocation of low and very low income sites that must be redistributed in order to affirmatively further fair housing. In the Sites Inventory, five sites located in a single 24-acre block (Fairview Park) in the far western extremity of the community of Bret Harte have received an allocation of 45.6%, nearly half, of the total low- and very low-income units in the County. Given Bret Harte's status as a R/ECAP area, an area of high segregation and poverty, and an area without adequate resources, this allocation of such a significant percentage of the County's low and very low income units is a violation of the duty to affirmatively further fair housing. For this reason, we focused our analysis of potential rezone sites on finding a way to reduce the distribution of low and very low income units to this set of sites and reallocate the units to sites in high or highest resource areas and/or RCAAs.
California Rural Legal Assistance, Inc.	Sites Inventory	The next step in our analysis was to identify potential additional sites for that could be rezoned in RCAAs and high or highest resource areas to take on additional very low-, low-, and moderate-income housing unit allocations. To accomplish this, we took into account the following criteria, based on conversations with the County and factors identified and explained in the Housing Element: • Resource level (TCAC designation, RCAA/R/ECAP status) • Infrastructure availability (water and wastewater) • Parcel size (over .5 acres, under 10 acres) • Status of planned development. Based on information available in Draft 4.5,2 we excluded the following planned and approved project sites from our proposed rezone list: oElmwood Estates 024-055-060 o Isaaco Estates 024-025-002, -014, -052, and -053 o Hoffman Ranch Subdivision 024-012-027 o Lazares Subdivision 024-012-009 • Parcel utilization. Rather than propose the rezoning of parcels that have already been allocated for multiple income levels, we included in this proposal only sites that are currently designated solely for above moderate income units. Within Denair, there are other sites that include both above moderate and moderate income units that may also be worth considering for rezone potential. Based on these factors, we identified the sites in Table 2 as having the potential to be rezoned to allow very low, low, and moderate income housing in addition to above moderate income housing. All sites identified for possible rezoning were located in Denair, due primarily to constraints regarding water and/or wastewater infrastructure availability.
California Rural Legal Assistance, Inc.	Sites Inventory	The next step in our analysis was to determine how the potential rezone sites, if rezoned, could then be more efficiently utilized to accommodate multiple income level units within each site. To accomplish this, we looked to the Sites Inventory for possible distribution schemes the County has already considered in other sites marked for rezoning. Table 2 highlights sites already proposed for rezoning that are intended to accommodate an allocation of very low, low, moderate, and/or above moderate-income units together within a single project.
California Rural Legal Assistance, Inc.	Sites Inventory	Under the distribution framework used by the Sites shown in Table 3, sites in Denair can be rezoned to accommodate additional low and very low-income units, allowing for a more equitable distribution of sites to both Bret Harte and to Denair and yielding a less segregative alternative to the current Sites Inventory.Based on the distributions of units used for the sites included in Table 3, rezoning the Denair sites in Table 2 to accommodate higher density housing units would make it possible to reallocate the units between Bret Harte and Denair in the manner described in Table 4 below
California Rural Legal Assistance, Inc.	Sites Inventory	Under the duty to Affirmatively Further Fair Housing and related fair housing laws, the County must adopt the least segregative feasible version of the Sites Inventory. To the extent the proposed redistribution, or some version of it, provides a less segregative feasible unit allocation, the County must update its Sites Inventory accordingly. We acknowledge that in order to adopt the proposed rezoning scheme, the County must conduct additional analysis of factors pertaining to these sites that may not have been included in the housing element or data provided to us. We affirm our commitment to continuing to work with the County to determine the feasibility of this less segregative alternative and look forward to continuing conversations to this end.
California Rural Legal Assistance, Inc.	Programs	Housing Element law requires the County to assist in the development of adequate housing to meet the needs of extremely low, very low, low- and moderate-income households. Action 2-1i represents a positive step toward accomplishing this goal, but the following revisions are needed to ensure that specific disadvantaged communities will benefit from affordable housing development within the planning period. Action 2-1i: Provide technical assistance to prospective developers interested in developing housing for extremely low-income (ELI) households. Defer Public Facility Fees for housing developments providing ELI housing. Advocate for providing prioritization in RFP scoring for Develop and advocate for an update to RFP scoring criteria to prioritize technical assistance for affordable housing developments providing 50 percent or more ELI housing units. Hold at least two meetings for developers interested in affordable housing for ELI households to provide technical assistance. Hold meetings in and regarding neighborhoods with higher concentrations of ELI households (i.e., Rouse/Colorado, Bret Harte, and Airport). Defer the PFF fees for two housing developments providing 50 percent or more ELI units. Recommend a scoring preference for ELI priority to the Community Development Committee by 2026.
California Rural Legal Assistance, Inc.	Programs	Action 3-6k, which commits the County to assessing its Zoning Ordinance to consider the possibility of making amendments to permit the development of housing such as tiny home villages and cottage housing in order to combat homelessness, has the potential to yield significant benefits for extremely low-income and unhoused individuals in the County. In order to ensure that this potential is realized, the County must commit to taking specific actions toward this goal and engaging with members of the public in heavily impacted communities to ensure that policy changes reflect community needs and priorities.

California Rural Legal Assistance, Inc.	Programs	Draft 4.5 adds to Action 2-3b a commitment to providing tenant/landlord counseling services. This addition reflects the County's existing approach to addressing fair housing issues but does not expand or improve it. By focusing outreach on potential tenants and landlords or property managers, Action 2-3b fails to take steps to reach existing tenants that would benefit from knowledge of their fair housing rights. We recommend revisions to this action to ensure that existing as well as prospective tenants are given the opportunity to learn about their legal rights on an ongoing basis throughout the planning period.
California Rural Legal Assistance, Inc.	Programs	Housing Element law requires the County to develop strategies and actions to address identified fair housing issues, including place-based strategies and actions to protect existing residents from displacement. Although much of Stanislaus County is at a relatively low risk, several of the County's lowest resource and most highly segregated communities are considered sensitive for displacement risk, with the highest displacement risks in the communities of Bret Harte, Airport, Bystrom, and Rouse-Colorado. Rouse-Colorado is the only community in the Northern San Joaquin Valley where more than one income group risks displacement. Although the County has classified displacement as a low priority contributing factor, the displacement experienced by residents of these specific communities is acute, indicating a strong need for place-based strategies to combat displacement risk that focuses on these communities. The Anti-Displacement strategy included in Draft 4.5 is a strong step in the direction of meaningfully combatting the displacement risks experienced by County residents. However, it is insufficiently tailored to ensure that residents experiencing displacement risk will benefit from its actions during the planning period. We recommend revisions to ensure that this action adequately supports residents at risk of displacement in compliance with Housing Element law.
Burbank Paradise Fire Department	Programs	Please ensure that all new housing in Stanislaus County is required to comply with proper safety setbacks and defensible space standards. California law (PRC §4291) already establishes a 100-foot defensible space for wildfire safety, yet current county zoning and building codes do not consistently apply this distance to new home construction. I urge the County to strengthen its standards by requiring at least a 100-foot setback/clearance for new housing wherever feasible. This would not only improve public safety and wildfire resilience, but also benefit the community by ensuring larger lots, reduced risk to residents, and greater protection for first responders.
Community Member	Sites Inventory	Thank you for sharing this information, I am requesting to add my parcel in this General Plan Amendment implementation PLN2025-0053 and rezone it from AG to Commercial/Mixed Use. I will apply officially with rezone application upon confirmation.
Salida Fire Protection District	Programs	Salida requests that the Housing Element address funding for essential fire and emergency response services for residential development within Salida's service area - specifically, the requirement that new housing development projects within Salida will, as a condition of approval, be required to join Salida's to enter into Salida's Community Facilities District ("CFD").
Salida Fire Protection District	Housing Resources	While the Housing Element Update provides details as to what agencies provide fire/emergency response services within the unincorporated County, it does not adequately address the financial impacts that new housing development will have on those services. In short, Salida requests that the Housing Element Update provide an analysis of how such services will be funded as the community develops. In Salida's case, a key element of offsetting the cost of new development is the payment of CFD taxes.

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Appendix B

Review of Past Accomplishments

Review of Past Accomplishments

To develop appropriate programs to address the housing issues identified in the 2023-2031 Housing Element, Stanislaus County reviewed the housing programs adopted in the 2015-2023 Housing Element and evaluated the effectiveness of these programs in delivering housing services and assistance. Table B-1 summarizes the County's construction goals and accomplishments during the 5th cycle planning period and Table B-2 provides a detailed program-level assessment of housing accomplishments over the 5th cycle planning period.

Overview of Accomplishments

During the 5th cycle Housing Element, the County implemented numerous programs to support market rate and affordable housing production, homeownership, preservation of existing housing stock, and tenant protection. A full list of programs is included in Table B-2. Most notably, as of December 31, 2022, the County implemented the following:

- **Homeownership:** Three new homes were sold to First-Time Homebuyers. One homebuyer received counseling.
- **Interagency support and coordination:** The County continued to participate in the City of Turlock/Stanislaus Urban County Home Investment Partnerships Program (HOME) Consortium and to serve as the lead entity for the Stanislaus Urban County. The County was awarded SB 2 planning grant program funds, Local Early Action Planning (LEAP) grant funds, Regional Early Action Planning (REAP), and Permanent Local Housing Allocation (PLHA) program funds. The County continues to participate in the Continuum of Care (CoC) by serving as the administrative entity for California Emergency Solutions Grant (ESG) funding programs for people experiencing homelessness and coordinating the programing of Stanislaus Urban County ESG funding with the CoC. A regional housing strategy effort, Housing Stanislaus, was undertaken to formulate a countywide vison and strategy framework for accelerating affordable market-rate housing in Stanislaus County. A housing plan has been drafted and a housing summit releasing the Housing Stanislaus plan will be held in November 2023. The Department is also working with the County's Behavioral Health and Recover Services to issue a Request for Proposals/Request for Qualifications for on-call housing services and potential housing development projects.
- **Affordable Housing:** The County partnered with the Stanislaus County Housing Authority (HACS) to construct six affordably restricted units on three vacant properties the County acquired through the Neighborhood Stabilization Program funds. Additionally, two Neighborhood Stabilization Program (NSP) homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. The County contributed approximately $3 million in NSP funding for the construction of the Oak Leaf Meadows project in the City of Oakdale, which consisted of 56 multi-family affordable housing units; construction was completed in December of 2020. The County provided $1,097,233 in PLHA funds, in the form of a grant, to the Stanislaus Regional Housing Authority (SRHA) for the Central Valley Homes Development Project located at 413 Vine Street, in the City of Modesto, for the development of 15 permanent supportive housing units for households with incomes at 30 percent of the area median income (AMI).

- **Homelessness:** As the Urban County lead the County provided ESG funds to homeless services providers who served an average of 32 individuals per year with rapid re-housing services, 50 individuals with homeless prevention services, and 503 individuals with emergency shelter services throughout the Urban County member jurisdictions. One housing-related rezoning application was approved, allowing 22 units of an existing 90-unit migrant center to be used as temporary housing for homeless families during the winter months.
- **Enforcement:** The County continues to investigate building and zoning code violations and implement Title 24 of the California Building Code. The Building Division processed 38 dangerous and abandoned building cases and investigated approximately 440 housing related building complaints throughout the planning period. The Code Enforcement Division of the Environmental Resources Department also conducted inspections on housing complaints throughout the planning period.
- **Farmworker Housing:** Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single-family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. A farmworker housing ordinance was drafted; however, State laws regarding the permitting of farmworker housing continue to be allowed in the interim period before the farmworker housing ordinance is adopted.
- **Fair Housing:** As the Urban County lead, the County contracted with Project Sentinel for fair housing services who assisted with an average of 399 fair housing and tenant/landlord referrals, 12 housing cases, and 32 tenant/landlord cases per year for all Urban County member jurisdictions which includes unincorporated Stanislaus County and the cities of Ceres, Hughson, Oakdale, Newman, Patterson, Riverbank, and Waterford.
- **Accessory Dwelling Units (ADU)**: The County approved 98 building permits for ADUs (70 of which were finaled) throughout the planning period.
- **Housing Rehabilitation**: The Housing Rehabilitation Program is implemented by the HACS using Community Development Block Grant (CDBG) and HOME funding; 15 households were assisted with rehab throughout the planning period of which seven were low- and very low-income households.
- **Infrastructure**: The Parklawn Neighborhood Sewer Project and Airport Neighborhood Sewer projects were completed during the planning period. The first phase of the West Modesto Sewer Infrastructure Project was also completed. 160 sewer connections were issued building permits, including: 123 in the Airport Neighborhood, 27 in the Parklawn Neighborhood, 9 in the Robertson Road Neighborhood, and one in the Spencer/Marshall Neighborhood.
- **Housing Related Land Use Actions:** A comprehensive update to the General Plan was adopted in August of 2016. Zoning Ordinance updates addressing compliance with State laws regarding density bonus regulations, reasonable accommodations, and by-right approval of emergency shelters were adopted in 2016 and an ADU ordinance was adopted in 2021. The County approved nine subdivisions (tentative maps) creating a total of 299 parcels of which four tentative maps included a rezone to Planned Development to allow for flexible design standards, one tentative map permitted the construction of five duplexes. Two of the approved maps were recorded and have begun construction of residential units and three other tentative maps are in the late stages of recording their final maps.

- **Streamlined Project Review:** Building permit streamlined review continued to be offered through the one-stop permit program by Building, Planning, Fire, Public Works, and DER staff throughout 2016. Building permits were made available online, customer appointments were implemented as a method for streamlining project submittal, pre-plan checked accessory dwelling unit plans were made available free of charge to residents of unincorporated Stanislaus County, and an online permit guide was launched on the County's website.
- **Fees:** In 2019 and 2020, the Board of Supervisors adopted updates to the Public Facility Fees to incorporate a lower fee for ADUs, a one-year Public Facilities Fees (PFF) waiver for ADUs constructed on properties that are owner occupied, a fee waiver for ADUs 750 square feet and less in size, and an alternative method for calculating ADU PFF which is based on the square footage of the main dwelling. Public facility fee deferrals continued to be offered as an option for low-income housing developments through the planning period. The County's PFF Committee approved two PFF waivers for affordable housing developments, one in the City of Modesto which includes 12 senior housing units available to low and very low-income households, and the other was in the City of Turlock which will be providing 22 units for low- and very low-income households.

Effectiveness in Addressing Special Needs

Special needs communities are demographic or occupational groups that call for specific program responses to address unique housing needs. State law specifically requires analysis of the special housing needs of people who are elderly or disabled (including developmental disabilities), female headed households, large families, farmworkers, and people experiencing homelessness. These special-needs groups often spend a disproportionate amount of their income to secure safe and decent housing and are sometimes subject to discrimination based on their specific needs or circumstances.

Stanislaus County's 5th cycle housing element addressed special needs populations through actions under *Program 1-4 – Stanislaus COC, Program 1-8 – Housing for Special Needs Populations, Program 2-1 – Residential Accessibility, Program 2-3 Funding and Technical Assistance for Special Needs Housing, Program 2-5 – Farmworker Housing in Agricultural and Other Zones, Program 2-6 – State and Federal Housing Programs for Farmworkers Program 2-8 – Universal Design*, *Program 4-6 – Extremely Low-Income Housing*, and *Program 4-8 – Emergency Shelter Capacity Monitoring*. These programs proactively address the identified special housing needs of the community, which include seniors, low-income families, and unhoused residents. During the 5th cycle, the County took the following actions to address special needs housing as of December 31, 2022:

Stanislaus County continued to participate in the CoC by serving as the Administrative Entity for the State's ESG funding programs for people experiencing homelessness and coordinating the programing of Stanislaus Urban County ESG funding with the CoC.

- The County utilized NSP funds to fund affordable housing developments for very low-income households and for disabled veterans. CDBG Public Service Grants, and Emergency Shelter Grants were also used to assist with emergency food, shelter and utility assistance.
- Staff provided technical assistance, responding to inquiries, and provided educational and support materials in person and electronically for clients with special needs. On average the ESG program served 29 Veterans, 46 Victims of Domestic Violence, 34 Seniors, one person with HIV/AIDS, 143 Chronically Homeless, and 380 persons with disabilities annually throughout the Urban County member jurisdictions.

- Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. Within Stanislaus Urban County, individuals experiencing homelessness were placed into rental housing and connected with services such as Temporary Assistance for Needy Families (TANF), Food Stamps, Veteran's Benefits, and employment opportunities. Households at-risk of becoming homeless were also assisted with rental assistance, utility arrears, and financial and employment counseling services. ESG funds and programs were used to provide emergency and transitional shelter to hundreds of housing insecure individuals.

Quantified Objectives

Table B-1 summarizes the County's progress toward meeting the previous 5th Cycle Housing Element RHNA as of July 2023. Stanislaus County did not reach its 5th cycle RHNA goals in the Very Low-, Low-, Moderate-, and Above Moderate-Income categories.

Table B-1 Quantified Housing Objective and Achieved Accomplishments

	New Construction		Rehabilitation	
	RHNA (2015-2023)	Actual	Objectives	Actual
Very Low-Income	538	0	-	-
Low-Income	345	32	-	-
Moderate-Income	391	109	-	-
Above Moderate-Income	967	617	-	-
Total	**2,241**	**758**	**30**	**15**

Review of Past Accomplishments

This section provides a program level assessment of housing accomplishments during the 5th cycle Housing Element planning period, which spanned 2015 to 2023. Government Code Section 65400 requires that each city or county prepare an annual progress report (APR) on the status of its current housing element and progress of its implementation. Table B-2 provides an overview of the current status and progress of each program using available online resources and data provided by the County as well as the appropriateness to further continue each program into the next housing element cycle. This assessment is not intended to be a full analysis, but instead, an initial pass at the programs that need to be kept or modified based on our knowledge of current housing law and best practice. Expansion of programs or the addition of new programs beyond what has been identified in this memo may be required as further analysis and input is provided during the process.

Table B-2 Housing Program Progress Analysis

Housing Program	Program Progress	Continued Appropriateness
Program 1-1 First-Time Homebuyers: Continue to utilize available federal and state funds for first-time homebuyer programs.	During the 5th Cycle Housing Element, three homes were sold to eligible first-time home buyers.	Program 1-1 has been carried over into Program 2-4 – Support Homeownership Opportunities in the 6th Cycle Housing Element.
Program 1-2 Interagency Coordination and Support: Continue to work in collaboration with federal, state, and local governmental agencies, as well as with private, nonprofit organizations and other community groups, to coordinate and build the capacity of local and regional housing programs, maximize funding opportunities, identify common housing goals and needs for targeted income groups, and to develop and implement affordable housing projects throughout the county.	Stanislaus County has continued its coordination and support with the City of Turlock for the Home Investment Partnerships Program (HOME) Consortium to ensure the development and implementation of affordable housing. Stanislaus County was awarded SB 2 program funds, Local Early Action Planning (LEAP) grant funds, Regional Early Action Planning (REAP), and Permanent Local Housing Allocation (PLHA) program funds, which include funding for the development of housing related planning efforts and housing production activities.	Program 1-2 has been carried over into Program 2-6 – Regional Collaboration to Facilitate Housing Throughout Stanislaus County in the 6th Cycle Housing Element.
Program 1-3 Homebuyer Counseling: Continue to participate with agencies that provide first-time homebuyer training.	During 2015 one homebuyer received counseling. Between 2016-2020, no homebuyer counseling was provided. With the increase in housing prices there has been a reduction in interest by very low-, low- and moderate-income households in receiving homebuyer assistance programs.	Program 1-3 has been carried over into Program 2-4 – Support Homeownership Opportunities in the 6th cycle Housing Element
Program 1-4 Stanislaus County Continuum of Care: Continue to participate in the Stanislaus CoC to coordinate with low-income housing producers and advocates, social service providers, representatives of public agencies, and other interested organizations. This collaborative meets regularly, as determined by the Stanislaus CoC Executive Committee, to generate input and promote solutions to housing and supportive service issues on a community-wide basis.	Stanislaus County has continued their effort in the Urban County (UC) and CoC in funding programs for people experiencing homelessness. The UC is participative in Homeless Point in Time count and works with the Community System of Care (CSOC) to implement the Coordinated Entry System. Since 2017, Stanislaus County has been awarded funding for their work as an Administrative Entity for the State's Emergency Solutions Grant program.	Program 1-4 has been carried over into Program 4-3 – Homelessness in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 1-5 Building Code and Housing Enforcement: Continue to enforce federal, state, and local laws such as the International Property Maintenance Code, California Housing Code (under Division 13 of the CA Health and Safety Code), Title 24 California Building Standards Code, and Title 16, Buildings and Construction of the Stanislaus County Code to ensure minimum health and safety standards in housing or other buildings.	The County's Department of Environmental Services continues to receive and investigate complaints of building code violations and enforce the International Property Maintenance Code. The Department of Planning and Community Development's Building Division processed 38 dangerous and abandoned building cases and investigated approximately 440 housing related building complaints throughout the planning period.	Program 1-5 has been carried over into Program 1-2 – Residential Compliance Program in the 6th Cycle Housing Element.
Program 1-6 Density Bonus: Encourage the inclusion of affordable housing in proposed developments by offering incentives to developers consisting of density bonuses in compliance with California Government Code Sections 65915 - 65918.	A density bonus ordinance was adopted in 2016. The County received inquiries, but no formal density bonus requests.	Program 1-6 has been carried over into Program 2-1 – Density Bonus in the 6th Cycle Housing Element.
Program 1-7 Building and Design Standards for residential Energy Conservation: Continue to promote the reduction of energy usage and costs through building and design practices that meets the minimum standards of Title 24, encourage conservation of energy resources and utilization of alternative energy resources, and incorporate energy-efficient features in assisted dwelling units and through partnerships with other agencies and energy providers who disburse information and/or offer programs and incentives to increase public awareness and utilization of energy conservation practices.	The County has continued the implementation of Title 24 of the California Building Code, which includes the Green Building Code, and updated the code in 2019.	Program 1-7 has been carried over into Program 1-3 – Building and Design Standards for Energy Efficiency in the 6th Cycle Housing Element.
Program 1-8 Housing for special needs Populations: Continue to support countywide efforts to increase the inventory of affordable and accessible housing for special needs populations including seniors, persons with disabilities, families with female heads of household, large families, farmworkers, homeless and other residents with special needs.	NSP funds were used to fund affordable housing developments for very low-income households and housing units for disabled veterans. CDBG, Public Service Grant, and Emergency Shelter Grants were also used to assist with emergency food, shelter and utility assistance.	Program 1-8 has been carried over into Program 4-1 – Housing for Special Needs Populations in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 1-9 Affordable Housing Development in the Salida Community Plan: Maximize affordable housing potential in the Medium Density Residential (1,255 units) and Medium-High Density Residential (643 units) designations in the Salida Community Plan area. Due to the large volume of land designated Medium and Medium High Density Residential in the Salida Community Plan area and its potential to greatly increase the supply of housing affordable to extremely low-, very low-, and low-income households, the County will initiate contact and continue to partner with affordable housing developers to maximize the potential of the affordability of homes constructed there. The County will encourage and assist developers to utilize any and all available design techniques and funding sources, including but not limited to the maximization of density, logical and efficient subdivision of the parcels that make up this district, predevelopment review and permit streamlining, and utilization of federal, state, and local programs and funding sources such as CDBG, HOME, tax credits, fee deferrals, etc.	The Environmental Impact Report was not completed. No development activity occurred due to infrastructure constraints.	Due to the infrastructure constraints associated with the Salida Community Plan, the County should eliminate this program with consideration for new HCD site selection criteria. Findings from the future sites inventory analysis will inform new prospective sites to make up for the shortfall from the Salida Community Plan.
Program 1-10 Affordable Rental Housing: Continue to support countywide efforts to increase the access to and the inventory of affordable rental housing for low-income households. Collaborate with other local jurisdictions on affordable rental housing development, when feasible.	The County partnered with the HACS to construct six affordably restricted units on three vacant properties the County acquired through the NSP funds. Two NSP homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. The County contributed NSP funding for the construction of 56 multi-family affordable housing units in the City of Oakdale and PLHA funds to the SRHA for the development of 15 permanent supportive housing units for households with very-low incomes in the City of Modesto. The County approved three Staff Approval Permits for the development of farmworker housing, consisting of three single family homes and construction of a 5,055 square foot commissary with five living units for farmworker housing. In addition, an average of 32 individuals per year were served with rapid re-housing services and 50 individuals per year with homeless prevention services throughout the Urban County member jurisdictions. .	Program 1-10 has been carried over into Program 2-1 – Affordable Housing Development Assistance and Program 2-3 – Housing Choice Vouchers in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 1-11 Analysis of Impediments to Fair Housing: Continue to implement the actions identified in response to impediments to fair housing identified in the County's Analysis of Impediments to Fair Housing completed in 2015.	An updated 2020-2025 Regional Analysis of Impediments to Fair Housing Choice was adopted on May 12, 2020 by the Board of Supervisors. It identified four findings of fair housing challenge: (1) Affordability and Costs, including high cost of housing, lack of affordable housing, application fee, deposits and up-front costs; (2) Income, including Low wages, people on fixed-incomes, and Section 8 Vouchers; (3) Price-setting, profit-driven sensibility of landlords; and (4) Supply and Demand, short supply of affordable housing and limits on new housing developments. The Stanislaus Urban County was awarded CDBG and ESG funds, which provided subsidies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes.	Program 1-11 Has been carried over into Program 5-1 – Affirmatively Furthering Fair Housing & Environmental Justice in the 6th Cycle Housing Element.
Program 2-1 Residential Accessibility: Continue to promote accessibility for the disabled by reviewing multi-family housing plans for compliance with state and federal regulations and by considering requests for reasonable accommodations.	The Zoning Ordinance was updated in 2016 to incorporate a reasonable accommodations ordinance. No multi-family housing plans or requests for reasonable accommodation were received.	Program 2-1 has been carried over into Program 4-1 – Housing for Special Needs Populations in the 6th Cycle Housing Element.
Program 2-2 Fair Housing: Continue to maintain fair housing services, contracted through the CDBG program, to respond to issues arising out of housing complaints, disseminate the County's fair housing policies, and to provide fair housing education to renters, housing providers, and public agencies and nonprofits. Continue to enforce the federal and state laws that prohibit discrimination in housing. They are the federal Fair Housing Amendment Act of 1988; Title VIII of the 1968 Civil Rights Act; California Fair Employment and Housing Act (Government Code Section 12955); and Unruh Act (California Civil Code Section 50).	As the Urban County lead, the County contracted with Project Sentinel for fair housing services who assisted with an average of 399 fair housing and tenant/landlord referrals, 12 housing cases, and 32 tenant/landlord cases per year for all Urban County member jurisdictions which includes unincorporated Stanislaus County and the cities of Ceres, Hughson, Oakdale, Newman, Patterson, Riverbank, and Waterford.	Program 2-2 has been carried over into Program 5-2 – Fair Housing Services in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 2-3 Funding and Technical Assistance for Special Needs Housing: Continue to seek and use all available funding programs and other types of housing assistance in an effort to accommodate the housing needs unique to special needs groups, including those with physical and developmental disabilities, seniors, families with female heads of household, large families, farmworkers, homeless, and other residents with special needs.	Staff provided technical assistance by responding to inquiries and by providing educational and support materials in person and electronically. Through the ESG assistance program they assisted clients with special needs.	Program 2-3 has been carried over into Program 5-2 – Fair Housing Services in the 6th Cycle Housing Element.
Program 2-4 Information and Referral: Continue to provide housing information and referral services to low-income, senior, disabled, homeless, and other special needs populations on an as-needed basis. Individuals seeking housing advice, counseling, and other types of assistance will be referred to public agencies, community-based organizations, and other service providers of the requested service or assistance.	The County provided housing information and referral services to the public. The County's website also identifies housing resource agencies.	Program 2-4 has been carried over into Program 5-2 – Fair Housing Services and Program 5-3 – Displacement Services in the 6th Cycle Housing Element.
Program 2-5 Farmworker Housing in Agricultural and other zones: Continue to allow farm-employee housing in agricultural zones as well as in any other zones that permit agricultural uses. Housing for year-round, full-time farm employees is permissible in addition to the number of dwellings normally allowed by the density standard. Per Health and Safety (H&S) Code Section 17021.6, no use permit, zoning variance, or other zoning clearance will be required of this employee housing that is not required of any other agricultural activity in the same zone. In addition, in accordance with H&S Code Section 17021.5, any employee housing providing accommodations for six or fewer employees is deemed a single-family structure with a residential land use designation and cannot be defined as a boardinghouse, rooming house, hotel, dormitory, or other similar term that implies that the employee housing is a business run for profit or differs in any other way from a family dwelling. Per H&S Code Section 17021.6, the County will review its Zoning Ordinance and amend it as needed to treat employee housing consisting of no more than 12 units or 36 beds as an agricultural use and permitted in the same	Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single-family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. A farmworker housing ordinance was drafted; however, state laws regarding the permitting of farmworker housing continue to be allowed in the interim period before the farmworker housing ordinance is adopted.	Program 2-5 has been carried over into Program 4-2 – Farmworker Housing in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
manner as other agricultural uses in the same zone in zones where agricultural uses are permitted.		
Program 2-6 State and Federal Housing Programs for Farmworkers: Continue to assist the Housing Authority of the County of Stanislaus in its administration of State and Federal housing programs for farmworker housing, and support their funding applications for farmworker housing, such as HCD's Joe Serna Grant. The County will outreach to developers and the agriculture industry to identify any constraints and solutions to the development of farmworker housing and to identify partnership opportunities.	Three temporary mobile home permits for farmworker housing were permitted and three staff level permits were issued to allow for the conversion of three existing single-family units to farmworker housing and for the construction of a 5,055 square-foot commissary with five attached living units for farmworker housing all within the general agricultural (A-2) zoning district. A farmworker housing ordinance was drafted; however, State laws regarding the permitting of farmworker housing continue to be allowed in the interim period before the farmworker housing ordinance is adopted.	Program 2-6 has been carried over into Program 4-2 – Farmworker Housing in the 6th Cycle Housing Element.
Program 2-7 Second Units: Continue to provide additional affordable housing opportunities by allowing the construction of second units in single-family residential areas, subject to the issuance of a building permit. Also consider reduced development fees for second units up to a certain square footage to help maintain their affordability. The County will also provide information and outreach regarding the option to build second units. Information will be made available at the public counter and on the County's website. As infrastructure is improved landowners will be made aware of the ability to connect including the construction of second units (see also Program 4-7).	The County permitted a total of 58 second units throughout the 5th cycle. The County permitted 98 ADUs between 2018 and 2022 in accordance with State law. In 2021 the County adopted their ADU ordinance to comply with current state regulations.	Program 2-7 has been carried over into Program 3-8 – Accessory Dwelling Units in the 6th Cycle Housing Element.
Program 2-8 Universal Design: Encourage development to include universal design elements that address limited lifting or flexibility, limited mobility, and limited vision.	No development request with universal design was received.	Program 2-8 has been carried over into Program 4-1 – Housing for Special Needs Populations in the 6th Cycle Housing Element.
Program 2-9 Overcrowding: Promote the construction of and seek financial sources for affordable single-family and multiple family units with 3-4 bedrooms to alleviate overcrowding, including room additions, within the County's housing rehabilitation programs.	In December 2020, a 56-unit multi-family development was completed in the City of Oakdale which. was partially funded by the County NSP program. 98 ADUs were permitted throughout the 5th cycle.	Program 2-9 has been carried over into Program 2-1 – Affordable Housing Development Assistance in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 2-10 Residential Care Homes: Amend the Zoning Ordinance to allow residential care homes (group homes) by right in residential zones for small group homes (six persons or fewer) and with a use permit for large facilities (seven persons or more) consistent with State law.	The County determined that the Zoning Ordinance is in compliance with the State law.	Program 2-10 has not carried over to the 6th Cycle Housing Element, as the objective of this program has been accomplished.
Program 3-1 Housing Programs: Through the CDBG Program and the HOME Consortium, the County will continue to support funding allocations to be used for a variety of housing programs that include rehabilitation, construction, land acquisition, infrastructure improvements, and purchase assistance.	The Housing Rehabilitation program provided funds for the repair of 14 single family units, The ESG homeless prevention program also provided funds to place individuals experiencing homelessness into housing. In 2020, the SRHA completed the construction of three single family homes and converted two NSP properties into affordable rental housing units.	Program 3-1 has been carried over into Program 1-1 – Home Rehabilitation Program and Program 2-1 – Affordable Housing Development Assistance in the 6th Cycle Housing Element.
Program 3-2 Home Rehabilitation Program: Continue to assist income-eligible households, including affordable housing rental units, with housing rehabilitation needs. The program is designed to respond to housing needs such as leaking roofs, fire damage, accessibility retrofits, and other health and safety related housing needs. The County will consider proactive approaches to housing rehabilitation, including developing criteria to identify households and neighborhoods of highest need, such as lower income renter households.	The Housing Rehabilitation Program is implemented by the HACS using CDBG and HOME funding; 15 households were assisted with rehab throughout the planning period of which 7 were low- and very low-income households.	Program 3-2 has been carried over into Program 1-1 – Home Rehabilitation Program in the 6th Cycle Housing Element.
Program 3-3 Municipal Utilities: Continue to construct or rehabilitate municipal utility services (e.g., water, sewer, storm drain) in disadvantaged unincorporated communities identified as needing services, in cooperation with incorporated cities. Priority projects during the time frame of this Housing Element include the Empire storm drain and sidewalk project and the Airport Neighborhood sewer project, which have been partially completed. The Stanislaus County Board of Supervisors (BOS) adopted (8/8/2011) Residential Neighborhood Infrastructure Project Ranking Criteria to be used in determining the priority of future infrastructure spending projects.	The Parklawn Neighborhood Sewer Project and Airport Neighborhood Sewer projects were completed during the planning period. The first phase of the West Modesto Sewer Infrastructure Project was also completed. 160 sewer connections were issued building permits, including: 123 in the Airport Neighborhood, 27 in the Parklawn Neighborhood, 9 in the Robertson Road Neighborhood, and one in the Spencer/Marshall Neighborhood.	Program 3-3 has been carried over into Program 3-9 – Infrastructure in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 3-4 Maintenance of Assisted Units: Seek to maintain any federally, state, or locally assisted multifamily rental housing through the development of programs in coordination with other public and private nonprofit housing agencies. No deed-restricted affordable units are currently located in the unincorporated areas of the County; therefore, there are no "at-risk" units at this time. Should the County have any affordable units prior to the end of the planning period; the County will contact all state and federal agencies that might provide affordable housing funds to determine whether any funding is available for preservation of the at-risk assisted units. The County will work with not-for-profit housing providers to apply for affordable housing subsidies that may be available for this use, if necessary, in the future.	NSP funded projects completed construction of eight affordable housing units in unincorporated Stanislaus County throughout the 5th cycle.	Program 3-4 has been carried over into Program 1-4 – Preservation of At-Risk Affordable Housing in the 6th Cycle Housing Element.
Program 4-1 General Plan Review: Review the General Plan, community plans, and zoning on an annual basis in a continuing effort to ensure that an adequate supply of land is available to meet local and regional housing goals for all types of housing.	The General Plan was updated and adopted in 2016. From 2017-2020 there was an adequate supply of land to meet regional housing goals.	Program 4-1 has been carried over into Program 3-1- Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.
Program 4-2 Vacant and Underutilized Site Development: Streamline the approval process as needed in order to encourage the development of vacant and underutilized sites. In addition, the County will create and maintain an inventory of potential residential infill sites, both vacant and underutilized. This information will be available to the public through the Planning and Community Development Department. The County will prioritize development of these small lots by informing developers and potential applicants about options for developing small lots. The County will also review its zoning standards during the planning period to identify any constraints to small lot development and, if identified, develop recommended revisions to development standards to facilitate small lot development	Vacant site data is provided online as parcel level data. Planning staff have also provided interested property owners and developers with information. The County partnered with the HACS to construct six affordably restricted units on three vacant properties the County acquired through the NSP funds. Two NSP homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. Additionally, ADU permits in infill development were issued, and certificate of occupancies were issued for other infill developments.	Program 4-2 has been carried over into Program 3-1- Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 4-3 Infill Development: Continue to participate with affordable housing developers and partner with other jurisdictions on infill projects that develop new affordable housing in areas with existing public facilities and services.	During the 5th cycle, the County partnered with the HACS to construct six affordably restricted units on three vacant properties the County acquired through the NSP funds. Two NSP homes (one in Empire; and one in Grayson) were made available as affordable rental units through the HACS. The County contributed NSP funding for the construction of 56 multi-family affordable housing units in the City of Oakdale and PLHA funds to the SRHA for the development of 15 permanent supportive housing units for households with very-low incomes in the City of Modesto all of which were affordable infill development. ADUs located on infill developments were also permitted.	Program 4-3 has been carried over into Program 3-1- Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.
Program 4-4 Minimum Residential Densities: Establish minimum residential densities in all residential zoning districts to encourage the construction of a broad range of densities in order to promote a variety of housing types. The High Density Residential district currently has a density range between 0 and 25 units per acre. VI-107A minimum density could be established at 16 units per acre, for example, to ensure that land in this district will be developed at its intended higher-density range. The establishment of the minimum densities shall correspond to Land Use Element density requirements by requiring that development be designed to maximize allowable densities unless it can be shown that site design constraints make development at the highest allowable density infeasible.	Minimum residential densities were not established during the 5th Cycle Housing Element.	Program 4-4 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.
Program 4-5 Mixed-Use Development: There may be opportunities in established central business districts to reorient business-only structures to contain both residential and nonresidential uses. This program will identify such potential properties and encourage proprietors to consider mixed use.	No mixed-use development projects were proposed in 2015-2020. The County will evaluate opportunities for rezoning and mixed-use development as a potential method for increasing affordable housing.	Program 4-5 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 4-6 Extremely Low-Income Housing: This program will seek to encourage, expand, and assist the types of housing that meet the needs of extremely low-income households and individuals, such as supportive housing, rental assistance programs, multi-family housing, and single-room occupancy (SRO) units, as well as supportive programs. The County will amend the Zoning Ordinance to permit and define SRO units in at least one zone with or without discretionary review. Funding assistance and/or financial incentives and concessions will be added and/or revised to include extremely low-income households as appropriate. ESG funds will continue to be utilized to provide rental assistance to extremely low-income households at risk of becoming homeless. Staff will outreach to developers to identify potential affordable housing opportunities for existing or new extremely low-income units on an annual basis.	During the 5th Cycle Housing Element, 70 homeless individuals were placed into rental housing and connected with services such as Temporary Assistance for Needy Families (TANF), Food Stamps, Veteran's Benefits, and employment opportunities. ESG funds were used to provide emergency and transitional shelters. ESG funds and programs assisted hundreds of housing insecure individuals with emergency shelter services.	Program 4-6 has been carried over into Program 2-1 – Affordable Housing Development Assistance and Program 4-3 – Homelessness in the 6th Cycle Housing Element.
Program 4-7 Areas with New infrastructure Capacity: Continue to encourage the construction of housing, including affordable housing, in lower income unincorporated areas with newly completed infrastructure improvements (i.e., water and sewer). Property owners in these areas will be notified of any increased development potential (including but not limited to second units), and incentives such as fee deferrals and permit streamlining will be offered.	The Parklawn Neighborhood Sewer Project and Airport Neighborhood Sewer projects were completed during the planning period. The first phase of the West Modesto Sewer Infrastructure Project was also completed. 160 sewer connections were issued building permits, including: 123 in the Airport Neighborhood, 27 in the Parklawn Neighborhood, 9 in the Robertson Road Neighborhood, and one in the Spencer/Marshall Neighborhood.	Program 4-7 has been carried over into Program 3-9 – Infrastructure in the 6th Cycle Housing Element.
Program 4-8 Emergency Shelter Capacity Monitoring: The Zoning Ordinance allows development of emergency shelters without discretionary review in the H-1 and C-2 zones outside of spheres of influence with a limit of 10 beds per zone, for a total of 20 beds between the two zones which may be a constraint on the development of emergency shelters. To address the potential constraint, the Ordinance will be reviewed and amended as appropriate to ensure zoning encourages the development of emergency shelters.	A Zoning Ordinance update addressing compliance with SB 2 and the by-right approval of emergency shelters was adopted in 2016. No emergency shelter providers have approached the planning department to request added capacity or the construction of a new emergency shelter.	Program 4-8 has been carried over into Program 4-3 – Homelessness in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 5-1 Regulations and Fees: Review existing fees, standards, ordinances, and procedures on an annual basis in a continuing effort to identify barriers to affordable housing and determine methods for reducing housing costs. This will include reviewing the level of public facilities fees charged to ensure they are consistent with the cost of providing public services and facilities and do not contribute unnecessarily to increasing housing costs.	Planning fees were updated in 2022. In 2019 and 2020, the Board of Supervisors adopted updates to the Public Facility Fees to amend fees based on current County projects and to incorporate reduced or waived fees for Accessory Dwelling Units. Public facility fee deferrals continued to be offered as an option for low-income housing developments through the planning period. The County's PFF Committee approved two PFF waivers for affordable housing developments, one in the City of Modesto which includes 12 senior housing units available to low and very low-income households, and the other was in the City of Turlock which will be providing 22 units for low- and very low-income households.	Program 5-1 has been carried over into Program 2-1 – Affordable Housing Development Assistance in the 6th Cycle Housing Element.
Program 5-2 Planned Development: Continue to encourage use of Planned Development (P-D) zones in lieu of standard residential zoning. P-D allows higher housing densities and greater flexibility in design, making it possible to develop a broader spectrum of housing choice for residents.	In 2018 one P-D rezoning application was approved for 22 units to be used as emergency shelter housing and four tentative maps were approved which included rezoning to Planned Development to allow for flexible design standards.	Program 5-2 has not been carried over into the 6th Cycle Housing Element, as it is an existing function of the Planning Department.
Program 5-3 One-stop Permits: Continue the efficiencies of one-stop shop building permit review process.	Streamlined review of building permits was ongoing during the 5th Cycle Housing Element	Program 5-3 has been carried over into Program 3-7 – Expedited Project Review in the 6th Cycle Housing Element.
Program 5-4 Building Code Review: Review and amend ordinances to reflect changes in mandated laws and emergency federal, state, and local trends.	Updated Title 24 and included adoption of HCD's Appendix Q for tiny homes. An ADU ordinance was adopted in 2020.	Program 5-4 has been carried over into Program 1-2 – Residential Compliance Program in the 6th Cycle Housing Element.
Program 5-5 Duplexes: Continue to allow the development of duplexes on corner lots in single-family residential zones.	During the 5th Cycle Housing Element, one duplex was constructed and one tentative map and rezone was approved for development of five duplexes on three parcels.	Program 5-5 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.

Housing Program	Program Progress	Continued Appropriateness
Program 5-6 Mobile Homes: Continue to allow mobile homes or manufactured housing in lieu of single- family residences. In order to fully implement State law, the Zoning Ordinance will be amended to allow mobile homes in the Historical Site (HS) zoning district, subject to allowable aesthetic and architectural requirements as those required for conventional dwellings. To encourage the development of mobile homes, information about options for mobile home development will continue to be provided over the phone and at the public counter.	Throughout the 5th cycle, as with prior cycles, mobile homes were permitted in lieu of single-family residences. A total of 108 mobile homes were permitted as single-family homes, farmworker housing, or as ADUs throughout the 5th cycle.	Program 5-6 has been carried over into Program 3-6 – Zoning for a Variety of Housing Types in the 6th Cycle Housing Element.
Program 5-7 Measure E Review and Encouraging Development on Non-measure E Parcels: Periodically review Measure E to see if the ability for Stanislaus County to meet its housing supply needs is constrained. If Measure E is found to be constraining the County's ability to meet its housing need, then establish incentives for non-Measure E parcels to develop, including coordinating with other local agencies to identify opportunities for affordable housing within incorporated communities. Examples of incentives that could be considered include fee deferrals, expedited permit processing, and modification of development standards in areas targeted for growth.	The County continues to evaluate Measure E to consider its impacts on housing development.	Program 5-7 has been carried over into Program 3-1 – Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth in the 6th Cycle Housing Element.

Appendix C

Sites Inventory

Table C-1 Housing Element Sites Inventory

Site Address/Intersection	Zip Code	Assessor Parcel Number	General Plan	Zoning Designation	Minimum Density Allowed	Maximum Density Allowed	Parcel Size (Acres)	Existing Use/Vacancy	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity
1409 MONO DR	95354	035-027-020	Industrial Transition	R-3	0	25	0.45	Vacant	0	6	1	7
TENAYA DR & S Santa Cruz Ave	95350	035-034-011	Industrial Transition	R-3	0	25	0.19	Vacant	0	2	1	3
507 KERR AVE	95354	035-038-017	Industrial Transition	R-3	0	25	0.18	Vacant	0	1	1	2
505 KERR AVE	95351	035-038-018	Industrial Transition	R-3	0	25	0.15	Vacant	0	1	1	2
409 EMPIRE AVE	95354	035-039-005	Industrial Transition	R-3	0	25	0.18	Vacant	0	1	1	2
430 THRASHER AVE	95350	035-039-019	Industrial Transition	R-3	0	25	0.18	Vacant	0	1	1	2
419 S CONEJO AVE	95350	035-040-025	Industrial Transition	R-3	0	25	0.28	Vacant	0	3	1	4
CRATER AVE & Cascade Ave	95351	038-023-014	Low Density Residential	R-1	0	8.7	1.18	Vacant	0	0	6	6
200 CRATER AVE	95351	038-026-011	Low Density Residential	R-1	0	8.7	0.19	Vacant	0	0	1	1
201 GLACIER AVE	95351	038-026-012	Low Density Residential	R-1	0	8.7	0.19	Vacant	0	0	1	1
200 GLACIER AVE	95351	038-026-033	Low Density Residential	R-1	0	8.7	0.19	Vacant	0	0	1	1
1534 EUREKA ST	95358	056-011-022	Low Density Residential	R-1	0	8.7	0.19	Vacant	0	0	1	1
1529 SPOKANE ST	95358	056-012-010	Low Density Residential	R-1	0	8.7	0.18	Vacant	0	0	1	1
1607 PORTLAND AVE	95358	056-014-003	Low Density Residential	R-1	0	8.7	0.28	Vacant	0	0	1	1
1744 SEATTLE ST	95358	056-019-051	Low Density Residential	R-1	0	8.7	0.19	Vacant	0	0	1	1
1825 SPOKANE ST	95358	056-020-009	Low Density Residential	R-1	0	8.7	0.15	Vacant	0	0	1	1
1818 DENVER ST	95358	056-021-026	Low Density Residential	R-1	0	8.7	0.14	Vacant	0	0	1	1
1760 DALLAS ST	95358	056-023-033	Low Density Residential	R-1	0	8.7	0.15	Vacant	0	0	1	1
TUCSON & LASSEN AVE	95350	056-034-002	Low Density Residential	R-1	0	8.7	0.26	Vacant	0	0	1	1
1604 GLENN AVE	95351	056-037-032	Low Density Residential	R-1	0	8.7	0.14	Vacant	0	0	1	1
1228 IMPERIAL AVE	95358	056-039-010	Low Density Residential	R-1	0	8.7	0.13	Vacant	0	0	1	1
1231 LASSEN AVE	95358	056-040-024	Low Density Residential	R-1	0	8.7	0.15	Vacant	0	0	1	1
1406 LASSEN AVE	95351	056-040-035	Low Density Residential	R-1	0	8.7	0.14	Vacant	0	0	1	1
401 IMPERIAL AVE	95358	056-047-020	Low Density Residential	R-1	0	8.7	0.22	Vacant	0	0	1	1
909 DOVER AVE	95358	086-004-052	Low Density Residential	R-1	0	8.7	0.15	Vacant	0	0	1	1
E 5TH ST & E St	95313	027-005-011	Low Density Residential	R-A	0	2.2	0.16	Vacant	0	0	1	1
4TH ST & G St	95313	027-011-003	Low Density Residential	R-A	0	5.4	0.28	Vacant	0	0	1	1
4TH ST & G St	95313	027-011-004	Low Density Residential	R-A	0	5.4	0.28	Vacant	0	0	1	1
4TH ST & G St	95313	027-011-005	Low Density Residential	R-A	0	5.4	0.28	Vacant	0	0	1	1
I ST & W 5th St	95313	027-014-011	Low Density Residential	R-A	0	5.4	0.34	Vacant	0	0	1	1
0 COUNTRY CLUB DR	95356	004-007-051	Low Density Residential	R-1	0	8.7	0.46	Vacant	0	0	2	2
HILLCREST DR & Country Club Dr	95350	004-059-055	Low Density Residential	R-A	0	5.4	2.52	Vacant	0	0	8	8
OAKMONT DR & Country Club Dr	95350	004-078-015	Low Density Residential	R-A	0	5.4	0.38	Vacant	0	0	1	1
SPY GLASS DR & Beltis	95350	004-085-020	Low Density Residential	R-A	0	5.4	0.46	Vacant	0	0	1	1
7116 SPY GLASS DR	95356	004-085-024	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
ATHERTON CT & Spyglass Dr	95350	004-086-026	Low Density Residential	R-A	0	5.4	0.47	Vacant	0	0	1	1

Site Address/Intersection	Zip Code	Assessor Parcel Number	General Plan	Zoning Designation	Minimum Density Allowed	Maximum Density Allowed	Parcel Size (Acres)	Existing Use/Vacancy	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity
AVENIDA DEL RIO & Country Club Dr	95356	004-088-004	Low Density Residential	R-A	0	2.2	0.79	Vacant	0	0	1	1
CORTE DE ORO Avenida del Rio	95357	004-088-007	Low Density Residential	R-A	0	5.4	1	Vacant	0	0	3	3
7409 RIVER NINE DR	95356	004-093-005	Planned Development	P-D	0	5.4	0.49	Vacant	0	0	1	1
0 ISLE DR	95356	004-100-001	Low Density Residential	P-D	0	5.4	0.53	Vacant	0	0	1	1
0 ISLE DR	95356	004-100-002	Low Density Residential	P-D	0	5.4	0.74	Vacant	0	0	1	1
0 ISLE DR	95356	004-100-003	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 ISLE DR	95356	004-100-004	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 ISLE DR	95356	004-100-005	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-006	Low Density Residential	P-D	0	5.4	0.52	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-007	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-008	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-009	Low Density Residential	P-D	0	5.4	0.52	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-010	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-011	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-012	Low Density Residential	P-D	0	5.4	0.54	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-013	Low Density Residential	P-D	0	5.4	0.55	Vacant	0	0	1	1
0 MONUMENT CT	95356	004-100-014	Low Density Residential	P-D	0	5.4	0.62	Vacant	0	0	1	1
0 MONUMENT CT	95356	004-100-015	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 MONUMENT CT	95356	004-100-016	Low Density Residential	P-D	0	5.4	0.68	Vacant	0	0	1	1
0 MONUMENT CT	95356	004-100-017	Low Density Residential	P-D	0	5.4	0.75	Vacant	0	0	1	1
0 MONUMENT CT	95356	004-100-018	Low Density Residential	P-D	0	5.4	0.64	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-019	Low Density Residential	P-D	0	5.4	0.57	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-020	Low Density Residential	P-D	0	5.4	0.62	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-021	Low Density Residential	P-D	0	5.4	0.6	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-022	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-023	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-100-024	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-001	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-002	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-003	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-004	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-005	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-006	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-007	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-008	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-009	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-010	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1

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0 LAGO CIR	95356	004-101-011	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-012	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-013	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-014	Low Density Residential	P-D	0	5.4	0.61	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-015	Low Density Residential	P-D	0	5.4	0.53	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-016	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 LAGO CIR	95356	004-101-017	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 ISLE DR	95356	004-101-018	Low Density Residential	P-D	0	5.4	0.53	Vacant	0	0	1	1
0 ISLE DR	95356	004-101-019	Low Density Residential	P-D	0	5.4	0.67	Vacant	0	0	1	1
0 ISLE DR	95356	004-101-020	Low Density Residential	P-D	0	5.4	0.51	Vacant	0	0	1	1
0 ISLE DR	95356	004-101-021	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 ISLE DR	95356	004-101-022	Low Density Residential	P-D	0	5.4	0.5	Vacant	0	0	1	1
0 ISLE DR	95356	004-101-023	Low Density Residential	P-D	0	5.4	0.57	Vacant	0	0	1	1
4141 SPERRY RD	95316	024-014-007	Low Density Residential	R-A	0	5.4	0.96	Residential	0	0	2	2
4109 ZEERING RD	95316	024-015-003	Medium High Density Residential	R-2	0	14	0.68	Residential	0	3	1	4
4109 SPERRY RD	95316	024-015-010	Low Density Residential	R-A	0	5.4	1.67	Residential	0	0	4	4
4125 ZEERING RD	95316	024-015-024	Medium High Density Residential	R-2	0	14	0.67	Vacant	0	6	1	7
4009 ZEERING RD	95316	024-015-026	Medium High Density Residential	R-2	0	14	0.99	Residential	0	4	1	5
4140 N SANTA FE AVE	95316	024-015-028	Low Density Residential	R-A	0	5.4	1.76	Residential	0	0	5	5
4216 SPERRY RD	95316	024-016-004	Low Density Residential	R-A	0	5.4	2.99	Residential	0	0	9	9
4308 SPERRY RD	95316	024-016-009	Low Density Residential	R-A	0	5.4	1.69	Residential	0	0	5	5
4100 SPERRY RD	95316	024-017-003	Low Density Residential	R-A	0	5.4	2	Residential	0	0	6	6
4105 CHICA AVE	95316	024-017-034	Low Density Residential	R-A	0	5.4	0.21	Vacant	0	0	1	1
4101 CHICA AVE	95316	024-017-035	Low Density Residential	R-A	0	5.4	0.22	Vacant	0	0	1	1
4021 CHICA AVE	95316	024-017-036	Low Density Residential	R-A	0	5.4	0.22	Vacant	0	0	1	1
4017 CHICA AVE	95316	024-017-037	Low Density Residential	R-A	0	5.4	0.22	Vacant	0	0	1	1
3640 GRATTON RD	95316	024-024-016	Low Density Residential	R-A	0	5.4	2.1	Residential	0	0	6	6
3911 STORY RD	95316	024-024-040	Low Density Residential	R-A	0	5.4	0.21	Vacant	0	0	1	1
3613 MERCED AVE	95316	024-031-035	Medium Density Residential	R-3	0	25	0.95	Residential	0	8	1	9
0 DERR RD	95316	024-050-026	Low Density Residential	R-A	0	5.4	1.53	Vacant	0	0	5	5
4124 E ZEERING RD	95316	024-059-019	Medium High Density Residential	R-2	0	14	1.04	Residential	0	5	1	6
3252 STORY RD	95316	024-053-041	Low Density Residential	R-A	0	5.4	3.62	Vacant	0	0	12	12
3225 STORY RD	95316	024-025-004	Low Density Residential	R-A	0	5.4	1.8	Residential	0	0	4	4
0 PERRETT RD	95363	025-023-003	Specific Plan	S-P	0	5.4	3.45	Vacant	0	0	1	1
0 PERRETT RD	95363	025-023-004	Specific Plan	S-P	0	5.4	3.99	Vacant	0	0	1	1
0 PERRETT RD	95363	025-023-005	Specific Plan	S-P	0	5.4	3.68	Vacant	0	0	1	1
0 PERRETT RD	95363	025-023-006	Specific Plan	S-P	0	5.4	4.95	Vacant	0	0	1	1

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0 PERRETT RD	95363	025-023-007	Specific Plan	S-P	0	5.4	3.41	Vacant	0	0	1	1
0 PERRETT RD	95363	025-023-009	Specific Plan	S-P	0	5.4	4.39	Vacant	0	0	1	1
0 PERRETT RD	95363	025-023-010	Specific Plan	S-P	0	5.4	6.71	Vacant	0	0	1	1
20780 MORTON DAVIS CIR	95363	025-025-002	Specific Plan	S-P	0	5.4	0.52	Vacant	0	0	1	1
9451 MORTON DAVIS DR	95363	025-025-003	Specific Plan	S-P	0	5.4	0.51	Vacant	0	0	1	1
20740 MORTON DAVIS DR	95363	025-025-004	Specific Plan	S-P	0	5.4	0.8	Vacant	0	0	1	1
9421 MORTON DAVIS DR	95363	025-025-005	Specific Plan	S-P	0	5.4	0.47	Vacant	0	0	1	1
20420 MORTON DAVIS DR	95363	025-025-006	Specific Plan	S-P	0	5.4	0.53	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-025-007	Specific Plan	S-P	0	5.4	0.55	Vacant	0	0	1	1
9460 PERRETT RD	95363	025-025-008	Specific Plan	S-P	0	5.4	0.6	Vacant	0	0	1	1
0 PERRETT RD	95363	025-025-010	Specific Plan	S-P	0	5.4	0.53	Vacant	0	0	1	1
0 RUSS CT	95363	025-025-012	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
0 RUSS CT	95363	025-025-013	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
0 RUSS CT	95363	025-025-014	Specific Plan	S-P	0	5.4	0.52	Vacant	0	0	1	1
0 RUSS CT	95363	025-025-015	Specific Plan	S-P	0	5.4	0.59	Vacant	0	0	1	1
9321 RUSS CT	95363	025-025-017	Specific Plan	S-P	0	5.4	0.47	Vacant	0	0	1	1
9341 RUSS CT	95363	025-025-018	Specific Plan	S-P	0	5.4	0.49	Vacant	0	0	1	1
9361 RUSS CT	95363	025-025-019	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
9240 FOXY CT	95363	025-025-027	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
9220 FOXY CT	95363	025-025-028	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
9200 FOXY CT	95363	025-025-029	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
9201 FOXY CT	95363	025-025-030	Specific Plan	S-P	0	5.4	0.49	Vacant	0	0	1	1
9321 FOXY CT	95363	025-025-034	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
9541 BOAR HEAD LN	95363	025-025-047	Specific Plan	S-P	0	5.4	0.52	Vacant	0	0	1	1
20460 MORTON DAVIS CIR	95363	025-025-053	Specific Plan	S-P	0	5.4	0.76	Vacant	0	0	1	1
20480 MORTON DAVIS CIR	95363	025-025-054	Specific Plan	S-P	0	5.4	0.61	Vacant	0	0	1	1
20500 MORTON DAVIS CIR	95363	025-025-055	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
20520 MORTON DAVIS CIR	95363	025-025-056	Specific Plan	S-P	0	5.4	0.56	Vacant	0	0	1	1
0 MORTON DAVIS CIR	95363	025-025-057	Specific Plan	S-P	0	5.4	0.55	Vacant	0	0	1	1
20600 MORTON DAVIS CIR	95363	025-025-058	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
20620 MORTON DAVIS CIR	95363	025-025-059	Specific Plan	S-P	0	5.4	0.54	Vacant	0	0	1	1
20640 MORTON DAVIS CIR	95363	025-025-060	Specific Plan	S-P	0	5.4	0.56	Vacant	0	0	1	1
20660 MORTON DAVIS CIR	95363	025-025-061	Specific Plan	S-P	0	5.4	0.5	Vacant	0	0	1	1
20700 MORTON DAVIS CIR	95363	025-025-062	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
0 MORTON DAVIS CIR	95363	025-025-063	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
20739 MORTON DAVIS CIR	95363	025-025-064	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
20661 MORTON DAVIS CIR	95363	025-025-065	Specific Plan	S-P	0	5.4	0.49	Vacant	0	0	1	1

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20621 MORTON DAVIS CIR	95363	025-025-067	Specific Plan	S-P	0	5.4	0.55	Vacant	0	0	1	1
20601 MORTON DAVIS CIR	95363	025-025-068	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-008	Specific Plan	S-P	0	5.4	0.24	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-009	Specific Plan	S-P	0	5.4	0.25	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-019	Specific Plan	S-P	0	5.4	0.66	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-020	Specific Plan	S-P	0	5.4	0.66	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-021	Specific Plan	S-P	0	5.4	0.56	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-022	Specific Plan	S-P	0	5.4	0.67	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-025	Specific Plan	S-P	0	5.4	0.63	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-026	Specific Plan	S-P	0	5.4	0.56	Vacant	0	0	1	1
0 MORTON DAVIS DR	95363	025-026-027	Specific Plan	S-P	0	5.4	0.98	Vacant	0	0	1	1
0 PERRETT RD	95363	025-026-028	Specific Plan	S-P	0	5.4	0.53	Vacant	0	0	1	1
0 PERRETT RD	95363	025-027-001	Specific Plan	S-P	0	5.4	3.34	Vacant	0	0	1	1
0 PERRETT RD	95363	025-027-002	Specific Plan	S-P	0	5.4	3.03	Vacant	0	0	1	1
0 PERRETT RD	95363	025-027-003	Specific Plan	S-P	0	5.4	2.82	Vacant	0	0	1	1
0 PERRETT RD	95363	025-027-008	Specific Plan	S-P	0	5.4	3.33	Vacant	0	0	1	1
9661 SCHNEIDER LN	95363	025-027-012	Specific Plan	S-P	0	5.4	3.34	Vacant	0	0	1	1
9691 SCHNEIDER LN	95363	025-027-013	Specific Plan	S-P	0	5.4	3.03	Vacant	0	0	1	1
9600 SCHNEIDER LN	95363	025-027-015	Specific Plan	S-P	0	5.4	0.61	Vacant	0	0	1	1
20521 MORTON DAVIS CIR	95363	025-027-016	Specific Plan	S-P	0	5.4	0.55	Vacant	0	0	1	1
20541 MORTON DAVIS CIR	95363	025-027-017	Specific Plan	S-P	0	5.4	1.66	Vacant	0	0	1	1
20561 MORTON DAVIS CIR	95363	025-027-018	Specific Plan	S-P	0	5.4	0.83	Vacant	0	0	1	1
0 GRIFFITHS CT	95363	025-028-007	Specific Plan	S-P	0	5.4	9.12	Vacant	0	0	1	1
0 GRIFFITHS CT	95363	025-028-008	Specific Plan	S-P	0	5.4	5.88	Vacant	0	0	1	1
20081 GRIFFITHS CT	95363	025-028-009	Specific Plan	S-P	0	5.4	5.85	Vacant	0	0	1	1
20120 GRIFFITHS CT	95363	025-028-011	Specific Plan	S-P	0	5.4	1.21	Vacant	0	0	1	1
20140 GRIFFITHS CT	95363	025-028-012	Specific Plan	S-P	0	5.4	0.96	Vacant	0	0	1	1
9461 GRIFFITHS CT	95363	025-028-013	Specific Plan	S-P	0	5.4	1.36	Vacant	0	0	1	1
9321 GRIFFITHS LN	95363	025-028-014	Specific Plan	S-P	0	5.4	0.5	Vacant	0	0	1	1
9411 GRIFFITHS LN	95363	025-028-015	Specific Plan	S-P	0	5.4	0.52	Vacant	0	0	1	1
9431 GRIFFITHS LN	95363	025-028-016	Specific Plan	S-P	0	5.4	0.48	Vacant	0	0	1	1
20121 GRIFFITHS LN	95363	025-028-017	Specific Plan	S-P	0	5.4	0.72	Vacant	0	0	1	1
9440 GRIFFITHS LN	95363	025-028-018	Specific Plan	S-P	0	5.4	0.92	Vacant	0	0	1	1
9420 GRIFFITHS LN	95363	025-028-019	Specific Plan	S-P	0	5.4	0.75	Vacant	0	0	1	1
9400 GRIFFITHS LN	95363	025-028-020	Specific Plan	S-P	0	5.4	0.55	Vacant	0	0	1	1
20281 DENIS LN	95363	025-028-021	Specific Plan	S-P	0	5.4	0.49	Vacant	0	0	1	1
20261 DENIS LN	95363	025-028-022	Specific Plan	S-P	0	5.4	0.58	Vacant	0	0	1	1

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20241 DENIS LN	95363	025-028-023	Specific Plan	S-P	0	5.4	0.55	Vacant	0	0	1	1
20221 DENIS LN	95363	025-028-024	Specific Plan	S-P	0	5.4	0.74	Vacant	0	0	1	1
20201 DENIS LN	95363	025-028-025	Specific Plan	S-P	0	5.4	0.99	Vacant	0	0	1	1
20200 DENIS LN	95363	025-028-026	Specific Plan	S-P	0	5.4	1.46	Vacant	0	0	1	1
20401 PERRETT CT	95363	025-041-001	Specific Plan	S-P	0	5.4	0.48	Vacant	0	0	1	1
20381 PERRETT CT	95363	025-041-002	Specific Plan	S-P	0	5.4	0.92	Vacant	0	0	1	1
20371 PERRETT CT	95363	025-041-003	Specific Plan	S-P	0	5.4	1.35	Vacant	0	0	1	1
20351 PERRETT CT	95363	025-041-004	Specific Plan	S-P	0	5.4	5.65	Vacant	0	0	1	1
20341 PERRETT CT	95363	025-041-005	Specific Plan	S-P	0	5.4	4.76	Vacant	0	0	1	1
20331 PERRETT CT	95363	025-041-006	Specific Plan	S-P	0	5.4	0.94	Vacant	0	0	1	1
20321 PERRETT CT	95363	025-041-007	Specific Plan	S-P	0	5.4	0.92	Vacant	0	0	1	1
20301 PERRETT CT	95363	025-041-008	Specific Plan	S-P	0	5.4	0.92	Vacant	0	0	1	1
0 PERRETT CT	95363	025-041-009	Specific Plan	S-P	0	5.4	0.72	Vacant	0	0	1	1
20340 PERRETT CT	95363	025-041-010	Specific Plan	S-P	0	5.4	0.47	Vacant	0	0	1	1
0 PERRETT CT	95363	025-041-011	Specific Plan	S-P	0	5.4	0.48	Vacant	0	0	1	1
0 WILD BOAR PL	95363	025-042-002	Specific Plan	S-P	0	5.4	1.77	Vacant	0	0	1	1
19960 BOAR LN	95363	025-042-004	Specific Plan	S-P	0	5.4	4.88	Vacant	0	0	1	1
20000 BOAR LN	95363	025-042-005	Specific Plan	S-P	0	5.4	3.29	Vacant	0	0	1	1
20010 BOAR LN	95363	025-042-006	Specific Plan	S-P	0	5.4	0.89	Vacant	0	0	1	1
20040 BOAR LN	95363	025-042-007	Specific Plan	S-P	0	5.4	0.53	Vacant	0	0	1	1
20030 BOAR LN	95363	025-042-008	Specific Plan	S-P	0	5.4	0.53	Vacant	0	0	1	1
20040 BOAR LN	95363	025-042-009	Specific Plan	S-P	0	5.4	0.46	Vacant	0	0	1	1
9222 BOAR CT	95363	025-042-010	Specific Plan	S-P	0	5.4	0.47	Vacant	0	0	1	1
9201 BOAR CT	95363	025-042-011	Specific Plan	S-P	0	5.4	0.65	Vacant	0	0	1	1
9220 BOAR CT	95363	025-042-012	Specific Plan	S-P	0	5.4	0.77	Vacant	0	0	1	1
9351 WILD BOAR PL	95363	025-042-013	Specific Plan	S-P	0	5.4	0.61	Vacant	0	0	1	1
20035 WILD BOAR PL	95363	025-042-014	Specific Plan	S-P	0	5.4	0.61	Vacant	0	0	1	1
20025 WILD BOAR PL	95363	025-042-015	Specific Plan	S-P	0	5.4	1	Vacant	0	0	1	1
20015 WILD BOAR PL	95363	025-042-016	Specific Plan	S-P	0	5.4	1.14	Vacant	0	0	1	1
9390 WILD BOAR PL	95363	025-042-017	Specific Plan	S-P	0	5.4	4.67	Vacant	0	0	1	1
9370 WILD BOAR PL	95363	025-042-018	Specific Plan	S-P	0	5.4	1.57	Vacant	0	0	1	1
9350 WILD BOAR PL	95363	025-042-019	Specific Plan	S-P	0	5.4	1.01	Vacant	0	0	1	1
9340 WILD BOAR PL	95363	025-042-020	Specific Plan	S-P	0	5.4	0.92	Vacant	0	0	1	1
9320 WILD BOAR PL	95363	025-042-021	Specific Plan	S-P	0	5.4	0.75	Vacant	0	0	1	1
FRAZINE RD & A St	95357	133-001-014	Low Density Residential	R-A	0	5.4	3.48	Vacant	0	0	11	11
451 B ST	95357	133-002-001	Low Density Residential	R-A	0	5.4	1.33	Residential	0	0	2	2
401 B ST	95357	133-002-018	Low Density Residential	R-1	0	8.7	1.23	Residential	0	0	6	6

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420 B ST	95357	133-003-007	Low Density Residential	R-A	0	5.4	1.24	Residential	0	0	3	3
401 E ST	95357	133-004-039	Low Density Residential	R-1	0	8.7	0.56	Vacant	0	0	3	3
343 N ABBIE ST	95357	133-005-008	Low Density Residential	R-A	0	5.4	0.96	Vacant	0	0	3	3
4841 2ND ST	95357	133-007-045	Low Density Residential	R-1	0	8.7	1.1	Residential	0	0	5	5
E ST & 2nd St	95357	133-008-027	Low Density Residential	R-1	0	8.7	0.25	Vacant	0	0	1	1
0 S ABBIE ST	95357	133-017-065	Low Density Residential	R-A	0	2.2	0.96	Vacant	0	0	1	1
8517 LAIRD ST	95363	016-027-003	Low Density Residential	R-1	0	8.7	0.26	Vacant	0	0	1	1
8609 WILSON ST	95363	016-027-021	Low Density Residential	R-1	0	8.7	0.36	Vacant	0	0	1	1
8512 LAIRD ST	95363	016-028-002	Low Density Residential	R-1	0	8.7	0.68	Vacant	0	0	3	3
0 AMELIA ST	95363	016-028-059	Low Density Residential	R-1	0	8.7	0.11	Vacant	0	0	1	1
910 HICKMAN RD	95323	019-042-064	Low Density Residential	R-1	0	8.7	1.33	Vacant	0	0	7	7
13255 4TH ST	95323	019-045-037	Low Density Residential	R-A	0	5.4	1.93	Residential	0	0	5	5
13248 LAKE RD	95323	019-045-056	Low Density Residential	R-A	0	5.4	2.93	Residential	0	0	6	6
0 LAKE RD	95323	019-045-057	Low Density Residential	R-A	0	5.4	0.46	Vacant	0	0	1	1
4021 ANNA AVE	95328	045-014-004	Medium Density Residential	R-3	0	25	0.52	Single Family W/Extra Land	0	5	1	6
4212 ANNA AVE	95328	045-014-015	Medium Density Residential	R-3	0	25	0.52	Single Family W/Extra Land	0	4	1	5
4204 ANNA AVE	95328	045-014-016	Medium Density Residential	R-3	0	25	0.53	Single Family W/Extra Land	0	4	1	5
4205 LUCINDA AVE	95328	045-016-004	Low Density Residential	R-1	0	8.7	0.15	Vacant	0	0	1	1
5305 9TH ST	95328	045-019-014	Low Density Residential	R-1	0	8.7	0.14	Vacant	0	0	1	1
4305 LIZZIE AVE	95328	045-020-001	Low Density Residential	R-1	0	8.7	0.29	Vacant	0	0	1	1
5405 10TH ST	95328	045-020-046	Low Density Residential	R-1	0	8.7	0.15	Vacant	0	0	1	1
BLACKBERRY WAY	95328	045-064-073	Low Density Residential	R-1	0	8.7	0.41	Vacant	0	0	2	2
4821 NUNES RD	95328	045-065-001	Medium Density Residential	R-3	0	25	0.53	Vacant	0	7	1	8
0 BRIANNA AVE	95328	045-066-059	Low Density Residential	R-1	0	8.7	0.7	Vacant	0	0	3	3
5911 WASHINGTON RD	95328	045-071-002	Low Density Residential	R-A	0	5.4	1.11	Vacant	0	0	3	3
456 BYSTRUM RD	95351	038-008-009	Low Density Residential	R-3	0	25	0.62	Residential	0	6	1	7
805 SOUZA AVE	95351	038-011-006	Low Density Residential	R-3	0	25	0.46	Residential	0	4	1	5
818 SOUZA AVE	95351	038-011-010	Low Density Residential	R-3	0	25	0.29	Vacant	0	3	1	4
703 ERICKSON AVE	95351	038-011-020	Low Density Residential	R-3	0	25	0.18	Vacant	0	1	1	2
901 LOMBARDO AVE	95351	038-015-018	Low Density Residential	R-A	0	5.4	1.13	Residential	0	0	3	3
PERFIDIA AVE	95350	038-015-022	Low Density Residential	R-1	0	8.7	0.16	Vacant	0	0	1	1
720 LOMBARDO AVE	95351	038-015-039	Low Density Residential	R-1	0	8.7	0.14	Vacant	0	0	1	1
916 SONORA AVE	95351	038-016-008	Medium High Density Residential	R-3	0	25	0.92	Residential	0	9	1	10
923 LATIMER AVE	95351	038-016-009	Medium High Density Residential	R-3	0	25	0.47	Residential	0	4	1	5
915 LATIMER AVE	95351	038-016-010	Medium High Density Residential	R-3	0	25	0.7	Residential	0	6	1	7
850 SONORA AVE	95351	038-016-045	Medium High Density Residential	R-3	0	25	0.33	Residential	0	3	1	4
854 SONORA AVE	95354	038-016-046	Medium High Density Residential	R-3	0	25	0.39	Residential	0	3	1	4

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1102 LEO AVE	95358	038-042-001	Low Density Residential	R-1	0	8.7	0.49	Vacant	0	0	2	2
PARSONS CT & Avon St	95350	038-051-005	Low Density Residential	R-1	0	8.7	0.18	Vacant	0	0	1	1
PARSONS CT & Avon St	95350	038-051-007	Low Density Residential	R-1	0	8.7	0.17	Vacant	0	0	1	1
LIVE OAK CT & N Central Ave	95350	039-005-032	Low Density Residential	R-A	0	5.4	2.47	Vacant	0	0	5	5
1414 HOLM AVE	95351	039-030-033	Low Density Residential	R-1	0	8.7	0.13	Vacant	0	0	1	1
1620 HOLM AVE	95351	039-031-055	Low Density Residential	R-1	0	8.7	0.13	Vacant	0	0	1	1
0 SARATOGA HILLS DR	95361	002-022-038	Estate	R-A	0	0.33	3.25	Vacant	0	0	1	1
OAK VIEW DR & Wilderness Oaks	95361	006-081-099	Estate	R-A	0	0.33	3.01	Vacant	0	0	1	1
RODDEN RD & Mcleod Ave	95361	010-001-078	Estate	R-A	0	0.33	5.85	Vacant	0	0	1	1
11727 RODDEN RD	95361	010-001-079	Estate	R-A	0	0.33	9.71	Residential	0	0	2	2
RODDEN RD & Eaton Rd	95361	010-003-008	Estate	R-A	0	0.33	3.67	Vacant	0	0	1	1
0 GRAY RD	95361	010-009-002	Estate	R-A	0	0.33	6.8	Vacant	0	0	1	1
0 GRAY RD	95361	010-009-036	Estate	R-A	0	0.33	4.68	Vacant	0	0	1	1
LANCASTER RD & Stanislaus River Dr	95361	010-012-022	Estate	R-A	0	0.33	3.15	Vacant	0	0	1	1
13124 LANCASTER RD	95361	010-012-034	Estate	R-A	0	0.33	2.85	Vacant	0	0	1	1
0 LANCASTER RD	95361	010-012-042	Estate	R-A	0	0.33	2.82	Vacant	0	0	1	1
12919 LANCASTER RD	95361	010-012-043	Estate	R-A	0	0.33	2.75	Vacant	0	0	1	1
0 LANCASTER RD	95361	010-012-044	Estate	R-A	0	0.33	2.49	Vacant	0	0	1	1
10661 DIXON RD	95361	010-021-095	Low Density Residential	R-A	0	2.2	30.05	Residential	0	0	48	48
9821 BLACK OAK CT	95361	010-025-104	Low Density Residential	R-A	0	2.2	1.05	Vacant	0	0	1	1
9817 BLACK OAK CT	95361	010-025-105	Low Density Residential	R-A	0	2.2	1.2	Vacant	0	0	1	1
0 BLACK OAK CT	95361	010-025-109	Low Density Residential	R-A	0	2.2	0.74	Vacant	0	0	1	1
RIVER OAK CIR & Valley Oak Dr	95361	010-030-023	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
SOMMER PL & Rio Sombra Dr	95361	010-033-042	Low Density Residential	R-A	0	2.2	0.28	Vacant	0	0	1	1
11761 ORANGE BLOSSOM RD	95361	010-034-026	Low Density Residential	R-A	0	2.2	1.06	Vacant	0	0	1	1
DIXON RD & Morris Hunter Dr	95361	010-050-001	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
BUCKMEADOWS DR & Atlas Dr	95361	010-052-003	Low Density Residential	R-A	0	2.2	0.51	Vacant	0	0	1	1
BUCKMEADOWS DR & Atlas Dr	95361	010-052-004	Low Density Residential	R-A	0	2.2	0.51	Vacant	0	0	1	1
ORANGE BLOSSOM RD & Country Oak Ct	95361	010-057-007	Estate	R-A	0	0.33	0.61	Vacant	0	0	1	1
0 CIMARRON TRAIL	95361	010-065-007	Estate	R-A	0	0.33	2.69	Vacant	0	0	1	1
11320 WILD OAK CT	95361	010-068-016	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
FOX BOROUGH CT & Fox Borough Dr	95361	010-069-009	Low Density Residential	R-A	0	2.2	0.56	Vacant	0	0	1	1
10203 ATLAS RD	95361	010-071-009	Low Density Residential	R-A	0	2.2	0.57	Vacant	0	0	1	1
10019 RIVER RANCH CT	95361	010-071-015	Low Density Residential	R-A	0	2.2	0.66	Vacant	0	0	1	1
0 RODDEN RD	95361	010-074-009	Estate	R-A	0	0.33	6.11	Vacant	0	0	1	1
0 RODDEN RD	95361	010-074-016	Estate	R-A	0	0.33	3.03	Vacant	0	0	1	1

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0 FOX BOROUGH DR	95361	010-075-007	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 FOX BOROUGH DR	95361	010-075-018	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 GOLDSBOROUGH CIR	95361	010-075-026	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 GOLDSBOROUGH CIR	95361	010-075-027	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 GOLDSBOROUGH CIR	95361	010-075-040	Low Density Residential	R-A	0	2.2	0.62	Vacant	0	0	1	1
0 GOLDSBOROUGH CIR	95361	010-075-043	Low Density Residential	R-A	0	2.2	0.51	Vacant	0	0	1	1
0 FOX BOROUGH DR	95361	010-076-005	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 GOLDSBOROUGH CIR	95361	010-076-009	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 SAVANNAH CT	95361	010-076-014	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 SAVANNAH CT	95361	010-076-015	Low Density Residential	R-A	0	2.2	0.46	Vacant	0	0	1	1
0 SAVANNAH CT	95361	010-076-016	Low Density Residential	R-A	0	2.2	0.67	Vacant	0	0	1	1
0 NEWBERRY CT	95361	010-076-022	Low Density Residential	R-A	0	2.2	2.39	Vacant	0	0	3	3
0 SAVANNAH CT	95361	010-076-028	Low Density Residential	R-A	0	2.2	2.11	Vacant	0	0	3	3
0 HIDDEN HILLS DR	95361	010-077-009	Low Density Residential	R-A	0	2.2	0.54	Vacant	0	0	1	1
0 HIDDEN HILLS DR	95361	010-077-011	Low Density Residential	R-A	0	2.2	0.53	Vacant	0	0	1	1
0 DILLWOOD RD	95361	010-081-005	Low Density Residential	R-A	0	2.2	3.2	Vacant	0	0	5	5
RODDEN RD & Gibbs Dr	95361	010-082-003	Estate	R-A	0	0.33	6.52	Vacant	0	0	1	1
RODDEN RD & Gibbs Dr	95361	010-083-003	Estate	R-A	0	0.33	3	Vacant	0	0	1	1
624 STEARNS	95361	064-010-010	Low Density Residential	R-A	0	5.4	13.98	Residential	0	0	44	44
N STEARNS RD & Oakhurst Dr	95361	064-014-001	Low Density Residential	R-A	0	2.2	7.22	Vacant	0	0	11	11
2321 JACKIE CT	95361	064-035-014	Low Density Residential	R-A	0	2.2	1.22	Vacant	0	0	2	2
5367 ELM ST	95368	135-004-042	Medium High Density Residential	R-2	0	14	0.3	Vacant	0	2	1	3
4545 MASON AVE	95368	135-046-004	Medium Density Residential	R-3	0	25	0.3	Vacant	0	3	1	4
3601 HEMLOCK AVE	95307	053-030-047	Medium High Density Residential	R-2	0	14	0.19	Vacant	0	0	1	1
3611 LARCH AVE	95307	053-031-004	Medium High Density Residential	R-2	0	14	0.19	Vacant	0	0	1	1
3625 LARCH AVE	95307	053-031-008	Medium High Density Residential	R-2	0	14	0.19	Vacant	0	0	1	1
3627 LARCH AVE	95307	053-031-009	Medium High Density Residential	R-2	0	14	0.2	Vacant	0	1	1	2
2449 E SERVICE RD	95307	053-036-006	Low Density Residential	R-A	0	5.4	1.58	Residential	0	0	4	4
3950 COLLINS RD	95307	053-037-033	Low Density Residential	R-A	0	5.4	0.58	Vacant	0	0	1	1
1000 MITCHELL AVE	95380	042-021-005	Medium Density Residential	R-3	0	25	0.25	Vacant	0	3	1	4
940 MITCHELL AVE	95380	042-024-024	Medium Density Residential	R-3	0	25	0.16	Vacant	0	1	1	2
859 KENWOOD AVE	95380	042-024-032	Medium Density Residential	R-3	0	25	0.39	Residential	0	3	1	4
VALLEY HOME RD & Michigan Ave	95361	002-006-047	Low Density Residential	R-1	0	8.7	0.2	Vacant	0	0	1	1
13137 VALLEY HOME RD	95361	002-006-061	Low Density Residential	R-1	0	8.7	0.2	Vacant	0	0	1	1
4702 MICHIGAN AVE	95361	002-006-066	Low Density Residential	R-1	0	8.7	0.09	Vacant	0	0	1	1
13042 MINNESOTA AVE	95361	002-006-067	Low Density Residential	R-1	0	8.7	0.12	Vacant	0	0	1	1
WAVERLY DR & Ohio Ave	95350	017-016-015	Low Density Residential	R-A	0	0.33	0.63	Vacant	0	0	1	1

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0 PARADISE RD	95351	017-033-015	Low Density Residential	R-A	0	0.33	0.52	Vacant	0	0	1	1
0 PARADISE RD	95351	017-033-016	Low Density Residential	R-A	0	0.33	0.52	Vacant	0	0	1	1
0 PARADISE RD	95351	017-033-018	Low Density Residential	R-A	0	2.2	0.52	Vacant	0	0	1	1
622 ELM WAY	95351	029-016-003	Low Density Residential	R-A	0	0.33	0.25	Vacant	0	0	1	1
433 SPRUCE ST	95351	030-010-013	Low Density Residential	R-1	0	8.7	0.13	Vacant	0	0	1	1
0 SEYBOLD AVE	95351	030-014-028	Low Density Residential	R-1	0	8.7	0.48	Vacant	0	0	2	2
924 PANAMA DR	95351	030-015-027	Medium High Density Residential	R-3	0	25	0.71	Residential	0	7	1	8
1000 PANAMA DR	95351	030-015-028	Medium High Density Residential	R-3	0	25	0.69	Residential	0	6	1	7
1004 PANAMA DR	95351	030-015-029	Medium High Density Residential	R-3	0	25	0.61	Residential	0	6	1	7
1008 PANAMA DR	95351	030-015-030	Medium High Density Residential	R-3	0	25	0.53	Residential	0	4	1	5
1012 PANAMA DR	95351	030-015-031	Medium High Density Residential	R-3	0	25	0.6	Vacant	0	8	1	9
1312 RITSCH LN	95351	037-004-060	Low Density Residential	R-1	0	8.7	0.24	Vacant	0	0	1	1
1520 VICTORIA DR	95351	037-005-025	Low Density Residential	R-1	0	8.7	0.45	Vacant	0	0	2	2
VICTORIA DR & Paradise Rd	95351	037-010-012	Low Density Residential	R-1	0	8.7	0.16	Vacant	0	0	1	1
ROBERTSON RD & Vernon Ave	95351	037-020-009	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
KENNETH ST & Vernon Ave	95351	037-020-037	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
2236 ROBERTSON RD	95351	037-020-079	Medium Density Residential	R-2	0	14	0.22	Vacant	0	1	1	2
2021 KENNETH ST	95351	037-021-040	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
1905 DONALD ST	95351	037-021-068	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
2009 DONALD ST	95351	037-021-080	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
1728 KENNETH ST	95351	037-022-050	Medium Density Residential	R-2	0	14	0.16	Vacant	0	0	1	1
1713 JOHN ST	95351	037-024-025	Medium Density Residential	R-2	0	14	0.16	Vacant	0	0	1	1
1827 JOHN ST	95351	037-024-037	Medium Density Residential	R-2	0	14	0.16	Vacant	0	0	1	1
1904 DONALD ST	95351	037-025-021	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
2033 JOHN ST	95351	037-025-040	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
0 JOHN ST	95351	037-025-053	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
1420 ELSIE ST	95351	037-030-059	Low Density Residential	R-1	0	8.7	0.16	Vacant	0	0	1	1
719 SUTTER AVE	95351	037-031-015	Medium Density Residential	R-2	0	14	0.97	Residential	0	4	1	5
1202 ROUSE AVE	95351	037-031-029	Medium Density Residential	R-2	0	14	0.55	Vacant	0	4	1	5
1323 FIGARO AVE	95351	037-032-007	Medium Density Residential	R-2	0	14	0.27	Vacant	0	1	1	2
0 LEON AVE	95351	037-032-045	Medium High Density Residential	R-3	0	25	0.68	Vacant	0	9	1	10
1317 AVALON AVE	95350	037-034-039	Medium Density Residential	R-2	0	14	0.15	Vacant	0	0	1	1
620 COLORADO AVE	95351	037-039-016	Medium Density Residential	R-2	0	14	1.26	Residential	0	8	1	9
615 LEON AVE	95351	037-039-027	Medium Density Residential	R-2	0	14	0.94	Residential	0	5	1	6
601 LEON AVE	95351	037-039-031	Medium Density Residential	R-2	0	14	0.77	Residential	0	4	1	5
527 LEON AVE	95351	037-039-032	Medium Density Residential	R-2	0	14	0.94	Residential	0	5	1	6
517 LEON AVE	95351	037-039-035	Medium Density Residential	R-2	0	14	0.83	Residential	0	5	1	6

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COLORADO AVE	95351	037-039-039	Medium Density Residential	R-2	0	14	0.6	Vacant	0	5	1	6
528 ROSELAWN AVE	95351	037-040-012	Medium Density Residential	R-2	0	14	0.91	Residential	0	6	1	7
COLORADO AVE	95351	037-040-021	Medium Density Residential	R-2	0	14	0.2	Vacant	0	1	1	2
507 COLORADO AVE	95351	037-040-028	Medium Density Residential	R-2	0	14	0.74	Residential	0	4	1	5
0 COLORADO AVE	95351	037-040-056	Medium Density Residential	R-2	0	14	0.91	Vacant	0	8	1	9
525 COLORADO AVE	95351	037-040-057	Medium Density Residential	R-2	0	14	0.91	Vacant	0	8	1	9
532 SUNSET AVE	95351	037-041-014	Medium Density Residential	R-1	0	8.7	0.91	Residential	0	0	3	3
519 ROSELAWN AVE	95351	037-041-035	Medium Density Residential	R-1	0	8.7	0.92	Residential	0	0	3	3
ROSELAWN AVE	95351	037-041-036	Medium Density Residential	R-1	0	8.7	3.12	Vacant	0	0	17	17
812 COLORADO AVE	95351	037-032-011	Low Density Residential	R-A	0	5.4	0.92	Residential	0	0	3	3
718 COLORADO AVE	95351	037-031-011	Low Density Residential	R-A	0	5.4	4.85	Residential	0	0	16	16
1406 SOUTH AVE	95351	037-030-002	Low Density Residential	R-1	0	8.7	0.89	Residential	0	0	4	4
7111 MC HENRY AVE	95356	004-102-005	Planned Development	P-D	0	1	81.9	Vacant	0	0	65	65
TOTAL							**521.45**		**0**	**222**	**718**	**940**

Table C-2 Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need

Site Address/Intersection	ZIP Code	Assessor Parcel Number	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Description of Existing Uses	Very Low-Income Capacity	Low-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity
TUCSON AVE & PLUMAS AVE	95350	056-032-069	4.32	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Vacant	46	33	7	0	86
TUCSON AVE & MODOC AVE	95350	056-033-049	7.12	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Vacant	76	54	12	0	142
LASSEN & MARIN AVE	95350	056-034-001	5.1	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Vacant	54	39	9	0	102
LASSEN & INYO AVE	95350	056-035-001	5.55	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Vacant	60	42	9	0	111
YUMA & TUCSON AVE	95350	056-036-036	2.28	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Vacant	24	17	4	0	45
3833 LESTER RD	95316	024-012-004	4.52	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	24	17	4	0	45
3817 LESTER RD	95316	024-012-005	4.94	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	27	18	4	0	49
3325 KERN ST	95316	024-033-002	1.84	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	16	10	3	0	29
4165 MAIN ST	95316	024-033-026	1.11	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	9	6	2	0	17
124 S ABBIE ST	95357	133-017-002	0.96	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	11	2	13
114 S ABBIE ST	95357	133-017-003	0.93	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	11	2	13
18 S ABBIE ST	95357	133-017-006	0.96	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Vacant	10	7	2	0	19
100 S ABBIE ST	95357	133-017-004	0.96	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	11	2	13
32 S ABBIE ST	95357	133-017-005	0.96	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	11	2	13
4701 NORMA WAY	95328	045-021-019	1	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	0	0	12	2	14
4701 MAUD AVE	95328	045-021-020	2	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	19	13	3	0	35
0 9TH ST	95328	045-033-007	1.45	Commercial	H-1	Medium High Density Residential	R-3	20	25	Vacant	16	10	3	0	29
854 PECOS AVE	95350	038-039-016	1.19	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	12	8	2	0	22
838 PECOS AVE	95351	038-039-031	0.87	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	9	1	10
1809 E HATCH RD	95351	039-025-019	1.51	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	12	8	2	0	22
822 BYSTRUM RD	95350	038-017-041	4.4	Commercial	P-D	Medium High Density Residential	R-3	20	25	Residential	34	23	5	0	62
HOPE LN & Salida Ave	95368	135-041-010	0.32	Commercial	C-2	Medium High Density Residential	MU	20	25	Vacant	0	0	5	1	6
4573 HOPE LN	95368	135-041-011	0.62	Commercial	C-2	Medium High Density Residential	MU	20	25	Residential	0	0	5	1	6
4549 HOPE LN	95368	135-041-012	0.46	Commercial	C-2	Medium High Density Residential	MU	20	25	Vacant	0	0	8	1	9
3703 COLLINS RD	95307	053-031-023	4.18	Planned Development	P-D	Medium High Density Residential	R-3	20	25	Vacant	45	31	7	0	83
207 SPENCER AVE	95351	030-004-005	1.66	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	15	10	3	0	28
227 SPENCER AVE	95351	030-004-009	1.35	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	10	6	2	0	18
323 SPENCER AVE	95351	030-004-013	0.87	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	11	2	13
333 SPENCER AVE	95351	030-004-014	0.84	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	10	2	12
337 SPENCER AVE	95351	030-004-015	0.82	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	10	2	12
523 MAZE BLVD	95351	030-005-001	1.31	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	12	8	2	0	22
531 MAZE BLVD	95351	030-005-003	1.45	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	12	8	2	0	22
539 MAZE BLVD	95351	030-005-004	1.44	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	12	8	2	0	22
128 SPENCER AVE	95351	030-005-011	0.9	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	0	0	11	2	13
204 SPENCER AVE	95351	030-005-012	0.88	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	0	0	10	2	12
226 SPENCER AVE	95351	030-005-015	0.94	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	0	0	13	2	15

Site Address/Intersection	ZIP Code	Assessor Parcel Number	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Description of Existing Uses	Very Low-Income Capacity	Low-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity
310 SPENCER AVE	95358	030-005-016	3.54	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	35	25	6	0	66
320 SPENCER AVE	95351	030-005-018	1.24	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	11	7	2	0	20
533 TRUMAN AVE	95351	030-005-026	2.01	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	16	11	3	0	30
415 SPENCER AVE	95351	030-008-003	1.51	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	14	10	3	0	27
511 SPENCER AVE	95351	030-008-006	0.98	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	0	0	10	2	12
405 SPENCER AVE	95351	030-008-016	1.2	Low Density Residential	R-A	Medium High Density Residential	R-3	20	25	Residential	11	7	2	0	20
1427 RITSCH LN	95351	037-004-061	0.5	Low Density Residential	R-1	Medium High Density Residential	R-3	20	25	Residential	0	0	5	1	6
1511 CROWS LANDING RD	95351	056-011-028	0.77	Commercial	C-2	Commercial	MU	20	25	Commercial	0	0	13	2	15
1627 CROWS LANDING RD	95351	056-017-021	2.03	Commercial	C-2	Commercial	MU	20	25	Commercial	21	15	4	0	40
1715 CROWS LANDING RD	95358	056-018-002	0.93	Commercial	C-2	Commercial	MU	20	25	Commercial	0	0	16	2	18
1943 CROWS LANDING RD	95358	056-048-052	0.75	Commercial	C-2	Commercial	MU	20	25	Commercial	0	0	13	2	15
1540 CROWS LANDING RD	95351	086-010-034	0.82	Commercial	C-2	Commercial	MU	20	25	Vacant	0	0	14	2	16
TOTAL			**88.29**								**653**	**451**	**328**	**37**	**1,469**

Table C-3 Land Uses

Zoning Designation	General Land Uses Allowed
PD	Planned Residential Development (Chapter 21.40): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
R-1	Low Density Residential (Chapter 21.28): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
R-2	Medium Density Residential (Chapter 21.32): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
R-3	High Density Residential (Chapter 21.36): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
R-A	Very-low Density Residential (Chapter 21.24): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
S-P	Specific Plan - Residential at various densities (Chapter 21.38) https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
C-1	Neighborhood Commercial district (chapter 21.52): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
C-2	General Commercial (Chapter 21.56) https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
H-1	Highway Commercial (Chapter 21.48): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf
MU	Mixed-Use (Chapter 21.58 (new)): https://www.stancounty.com/planning/forms/zoning-ordinance.pdf

Sites Inventory by Census Tract Characteristics

			Sites Inventory Capacity + RHNA Credit Projects (Units)			AFFH Indicators						
Neighborhood/CDP	Number of Existing Households	Census Tract Number	Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile	Median Income
Airport	486	6099002100	0	15	7	75	High Segregation & Poverty	58.4	21.8	1 Income Group Displacement	93.8	$28,924
Crater Avenue Neighborhood		6099002301	0	0	9	89	Low Resource	62.9	22.9	Lower Displacement Risk	90.0	61,917
Bret Harte	1,259	6099002402	481	87	19	89	Low Resource	66.8	15.7	At Risk of Displacement	79.6	34,617
Parklawn	236	6099002501	0	14	3	87	Low Resource	55.2	6.6	Lower Displacement Risk	92.9	38,346
Crows Landing	121	6099003400	0	0	5	74	Low Resource	24.7	7.7	Lower Displacement Risk	90.4	50,125
Del Rio	490	6099000501	0	0	131	29	High Resource	26.5	1.6	Lower Displacement Risk	95.1	95,036
Denair	1,580	6099003604	127	39	68	44	High Resource	51.5	3.5	Lower Displacement Risk	69.8	106,726
Diablo Grande	361	6099003300	0	0	112	73	Moderate Resource	35.9	10.7	Lower Displacement Risk	96.5	81,895
Empire	1,343	6099002002	17	46	43	61	Low Resource	38.7	4.2	At Risk of Displacement	89.3	47,967
Grayson	276	6099003300	0	0	6	87	Moderate Resource	35.9	10.7	Lower Displacement Risk	96.5	81,895
Hickman	211	6099002901	0	0	19	43	Highest Resource	17.7	3.1	Lower Displacement Risk	75.1	79,474
Keyes	1,704	6099003002	58	38	18	75	High Resource	40.0	7.7	Lower Displacement Risk	78.7	56,579
Bystrom	1,085	6099002302	77	55	19	84	High Segregation & Poverty	72.6	22.7	1 Income Group Displacement	88.5	36,102

EXHIBIT C

Neighborhood/CDP	Number of Existing Households	Census Tract Number	Sites Inventory Capacity + RHNA Credit Projects (Units)			AFFH Indicators						
			Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile	Median Income
North Ceres (Encompasses Ceres-River Road neighborhood)		6099002701	0	0	5	57	Moderate Resource	49.7	0.3	Lower Displacement Risk	44.2	77,269
North Ceres (Encompasses Ceres-Herndon and Hatch/Stonum neighborhoods)		6099002702	20	2	2	80	Low Resource	53.9	15.9	Lower Displacement Risk	72.9	55,607
East Oakdale	1,122	6099000101	0	0	11	17	Highest Resource	27.9	2.2	Lower Displacement Risk	72.3	87,692
		6099000102	0	0	104	26	Highest Resource	26.0	1.6	Lower Displacement Risk	90.8	104,010
		6099000203	0	0	46	29	Moderate Resource	57.9	8.5	Lower Displacement Risk	87.0	64,375
Salida	4,078	6099000501	0	18	3	33	High Resource	26.5	1.6	Lower Displacement Risk	77.8	95,036
		6099000510	0	5	2	73	Moderate Resource	54.3	4.4	Lower Displacement Risk	77.8	62,253
South Ceres (Encompasses Laurel Central neighborhood)		6099002503	76	8	9	68	Low Resource	49.8	10.0	At Risk of Displacement	77.5	49,810
Turlock (Kenwood/Star neighborhood)		6099003906	0	7	3	64	Low Resource	60.2	4.6	At Risk of Displacement	47.1	34,500
Valley Home	81	6099000101	0	0	4	33	Highest Resource	27.9	2.2	Lower Displacement Risk	72.3	87,692
West Modesto (Encompasses Elm/Emerald and Beverly/Waverly neighborhoods)	1,559	6099001500	0	31	9	68	Low Resource	52.5	12.2	Lower Displacement Risk	92.9	71,290

Neighborhood/CDP	Number of Existing Households	Census Tract Number	Sites Inventory Capacity + RHNA Credit Projects (Units)			AFFH Indicators						
			Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile	Median Income
West Modesto (Encompasses California/Briggs, Spencer/Marshall neighborhoods)		6099001601	248	102	17	87	High Segregation & Poverty	63.7	19.7	At Risk of Displacement	61.5	48,563
West Modesto (Encompasses Beverly/Waverly, Vernon, and Robertson Road neighborhoods)		6099001603	0	6	18	84	Low Resource	66.7	18.8	1 Income Group Displacement	67.7	55,461
Rouse (Encompasses Rouse/Colorado neighborhood)		6099002200	0	77	63	87	Low Resource	61.9	22.7	2 Income Groups Displacement	84.9	44,010
Total			**1,104**	**550**	**755**							

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

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

Table reflects census tract boundaries from 2010 Census.

Sites Inventory by Community

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

Overall, the intention of the Stanislaus County sites inventory is to focus development within existing communities where infrastructure and services are in place to support multifamily development. The sites identified in this inventory have a potential development capacity of 2,409 units. The following discussion of the Sites Inventory is divided into 17 unincorporated areas:

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

Airport

The Airport community is part of unincorporated Stanislaus County and shares a border with the City of Modesto which provides water and sewer service to the area. Most of the community is zoned for residential uses, with the largest portion zoned R-3 multifamily. The properties identified in the Sites Inventory are vacant and fall within the multifamily zone. No rezoning is proposed. Table 5-9 summarizes available capacity in the Airport neighborhood and Table 5-10 details all residential sites in this area.

Table 1 - Summary of Residential Capacity in Airport

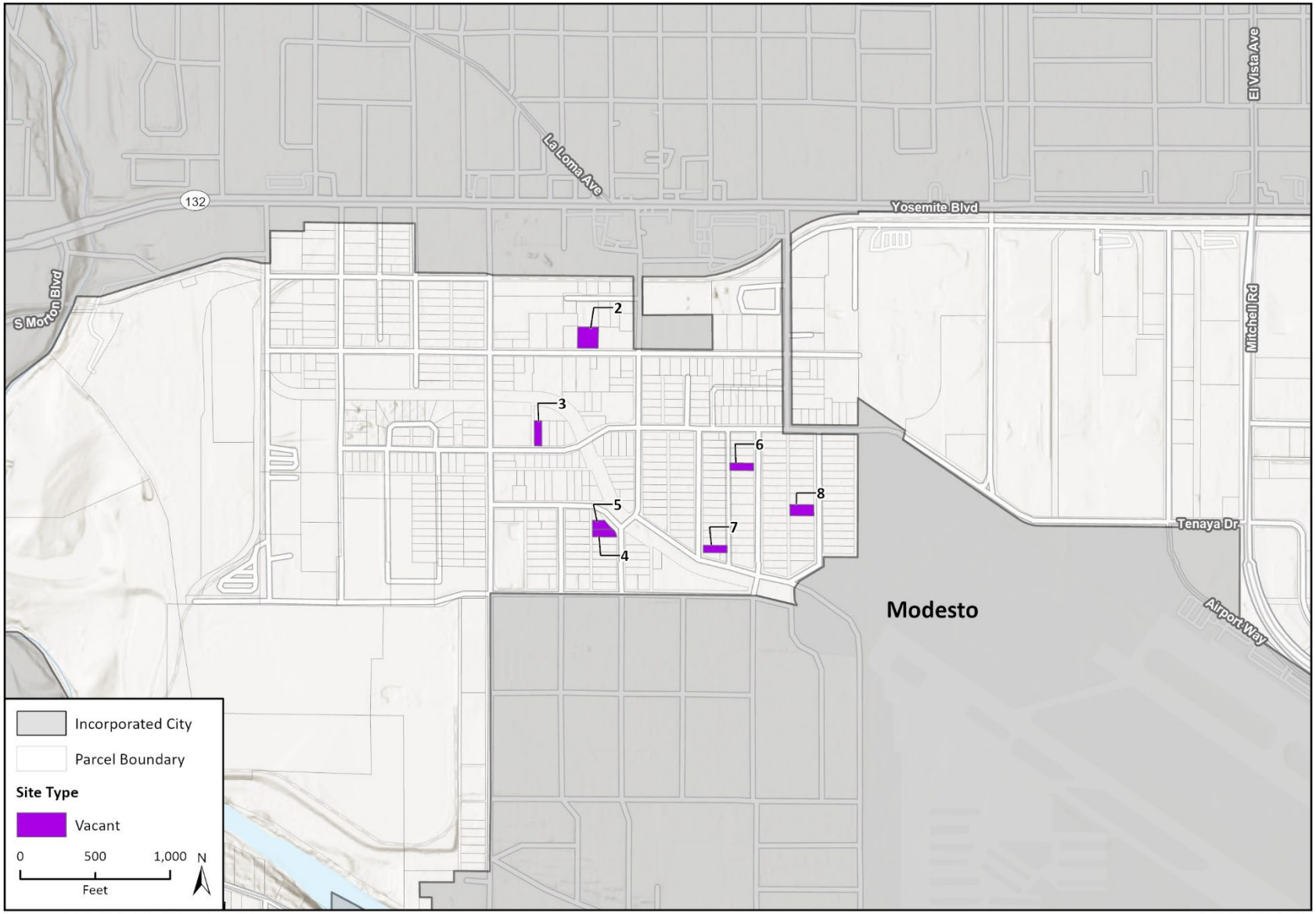
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	7	1.61	0	15	7	22
Rezoned Sites	0	0.0	0	0	0	0
Total	**7**	**1.61**	**0**	**15**	**7**	**22**

The Sites Inventory identified 1.61 acres of vacant and underutilized land within the Airport community (as shown in Figure 5-2) which can accommodate 22 housing units on seven sites. Of these 26 units, 18 units are assigned to the moderate-income category and eight units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to small parcel size and lower TCAC opportunity category scores of identified sites. The TCAC Resource categories for the sites in this community are High Segregation and Poverty.

Table 2 - Residential Sites in Airport

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
2	1409 MONO DR	035027020	0.45	Vacant	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
3	TENAYA DR	035034011	0.19	Vacant	R-3	No Change	25	3	No	High Segregation and Poverty	YES - Current
4	507 KERR AVE	035038017	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
5	505 KERR AVE	035038018	0.15	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
6	409 EMPIRE AVE	035039005	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
7	430 THRASHER AVE	035039019	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
8	419 S CONEJO AVE	035040025	0.28	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current

Figure 1 - Sites Identified in Airport



Bret Harte

Bret Harte is an unincorporated community south of the City of Modesto. The Sites Inventory groups together the Bret Harte, Crater, Olivero, and Parklawn neighborhoods and the commercial corridor of Crows Landing Road into the "Bret Harte" area. This area is also known more largely as the South Modesto area. Sites identified in this area are vacant residential properties or occupied by aging auto sales and service uses. The City of Modesto provides sewer and water service to portions of the unincorporated Bret Harte area. Table 5-11 summarizes available capacity in the Bret Harte neighborhood and Table 5-12 details all residential sites in this area.

Table 3 - Residential Capacity in Bret Harte

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	18	4.22	0	0	23	23
Rezone Sites	10	29.67	481	101	8	590
Total	**28**	**33.89**	**481**	**101**	**31**	**613**

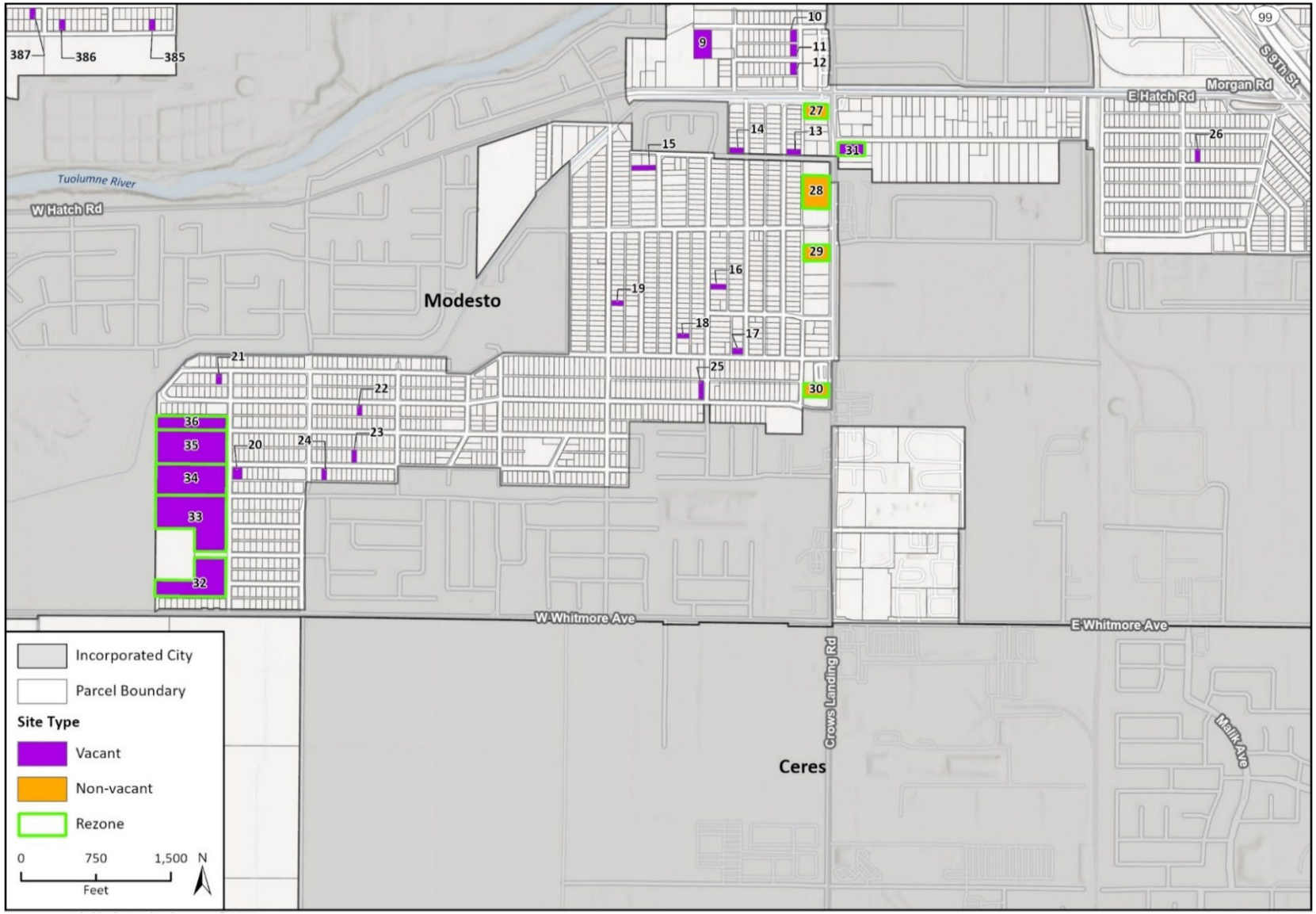
The Sites Inventory identified 4.22 acres of vacant and underutilized land within Bret Harte (as shown in Figure 5-3) which can accommodate 23 housing units. Approximately 24 acres of land over 5 single-family residential zoned parcels surrounding Fairview Park will be rezoned to accommodate residential development at 25 dwelling units per acre. An additional five General Commercial (C-2) zoned sites encompassing five acres along Crows Landing Road will be rezoned to Mixed Use (MU) which will be modified to allow mixed-use development at a maximum density of 25 dwelling units per acre as described in Program 3-1. The Crows Landing Road commercial corridor is also the subject of the City of Modesto's Southwest Modesto Plan which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, and infrastructure extending to the unincorporated area. The Southwest Modesto Plan and Modesto's Housing Plan both modeled a blend of high-density residential and commercial development on several vacant and underutilized sites along the Crows Landing Road corridor. Including the proposed rezoning, an estimated 613 housing units are projected in the Bret Harte community. Of these 613 units, 481 units are assigned to the lower-income category, 101 units are assigned to the moderate-income category and 31 units are assigned to the above moderate-income category. Larger sites (i.e., between two and eight acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

Table 4 - Residential Sites in Bret Harte

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
9	CRATER AVE	038023014	1.18	Vacant	R-1	No Change	8.7	6	No	Low Resource	YES - Current
10	200 CRATER AVE	038026011	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
11	201 GLACIER AVE	038026012	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
12	200 GLACIER AVE	038026033	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
13	1534 EUREKA ST	056011022	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
14	1529 SPOKANE ST	056012010	0.18	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
15	1607 PORTLAND AVE	056014003	0.28	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
16	1744 SEATTLE ST	056019051	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
17	1825 SPOKANE ST	056020009	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
18	1818 DENVER ST	056021026	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
19	1760 DALLAS ST	056023033	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
20	TUCSON & LASSEN AVE	056034002	0.26	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
21	1604 GLENN AVE	056037032	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
22	1228 IMPERIAL AVE	056039010	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
23	1231 LASSEN AVE	056040024	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
24	1406 LASSEN AVE	056040035	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
25	401 IMPERIAL AVE	056047020	0.22	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
26	909 DOVER AVE	086004052	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
27	1511 CROWS LANDING RD	056011028	0.77	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current
28	1627 CROWS LANDING RD	056017021	2.03	Commercial	C-2	MU	25	40	Yes	Low Resource	YES - Current
29	1715 CROWS LANDING RD	056018002	0.93	Commercial	C-2	MU	25	18	Yes	Low Resource	YES - Current
30	1943 CROWS LANDING RD	056048052	0.75	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
31	1540 CROWS LANDING RD	086010034	0.82	Vacant	C-2	MU	25	16	Yes	Low Resource	YES - Current
32	TUCSON AVE	056032069	4.32	Vacant	R-1	R-3	25	86	Yes	Low Resource	YES - Current
33	TUCSON AVE	056033049	7.12	Vacant	R-1	R-3	25	142	Yes	Low Resource	YES - Current
34	LASSEN & MARIN AVE	056034001	5.10	Vacant	R-1	R-3	25	102	Yes	Low Resource	YES - Current
35	LASSEN & INYO AVE	056035001	5.55	Vacant	R-1	R-3	25	111	Yes	Low Resource	YES - Current
36	YUMA & TUCSON AVE	056036036	2.28	Vacant	R-1	R-3	25	45	Yes	Low Resource	YES - Current

Figure 2 - Sites Identified in Bret Harte



Crows Landing

Crows Landing is a small community located where State Route 33 intersects with Fink Road/Crows Landing Road in southwest Stanislaus County. The majority of the community is zoned for agriculture, with some commercial, industrial, and rural residential zones. All sites identified for the inventory are vacant parcels in the rural residential zone. Water is provided by the Crows Landing Community Services District, and sewage is handled by individual septic systems. Table 5-13 summarizes available capacity in Crow's Landing and Table 5-14 details all residential sites in this area.

Table 5 - Residential Capacity in Crow's Landing

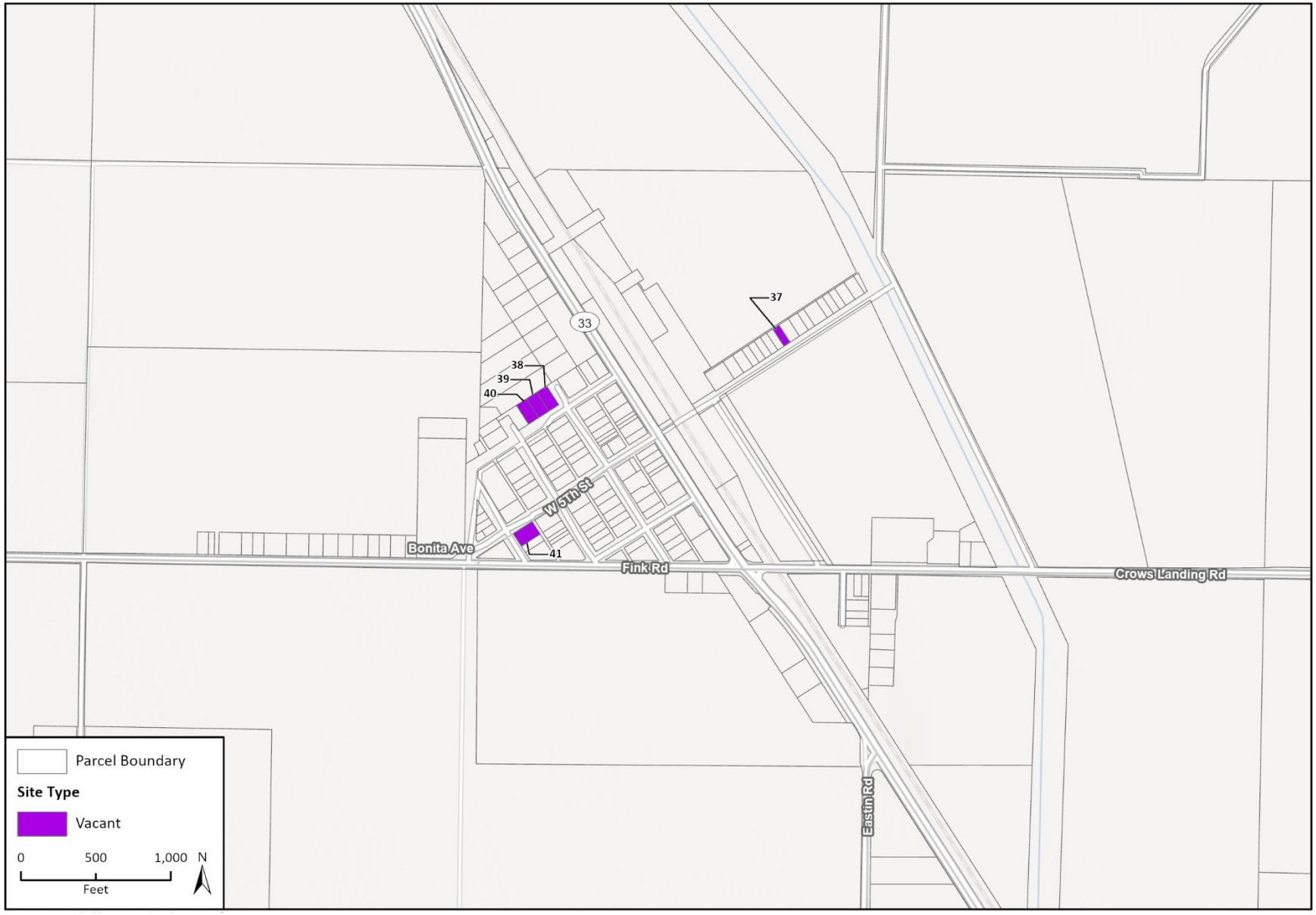
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	5	1.34	0	0	5	5
Rezoned Sites	0	0.00	0	0	0	0
Total	**5**	**1.34**	**0**	**0**	**0**	**5**

Due to the age and limited capacity of the existing water system and the lack of adequate sewer service for additional multifamily development in Crows Landing, no sites are proposed for rezoning. The Sites Inventory identified five vacant rural residential properties in the area suitable for the development of five housing units, as shown in Figure 5-4. All five units are assigned to the above moderate-income category. No sites are identified for rezone in this community. The County did not assume any lower-income units in this community due to small parcel size and lower TCAC opportunity category scores of identified sites. The TCAC Resource categories for the sites in this community are Low.

Table 6 - Residential Sites in Crows Landing

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
37	E 5TH ST	027005011	0.16	Vacant	R-A	No Change	2.2	1	No	Low Resource	YES - Potential
38	4TH ST	027011003	0.28	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential
39	4TH ST	027011004	0.28	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential
40	4TH ST	027011005	0.28	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential
41	I ST	027014011	0.34	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential

Figure 3 - Sites Identified in Crow's Landing



Del Rio

Del Rio is a community located in north-central Stanislaus County. Residential developments are a combination of planned developments and large, Rural Residential-zoned lots. Water is provided by the Del Este/City of Modesto system. There is no community sewer system, but some individual package treatment plants exist. Table 5-15 summarizes available capacity in Del Rio and Table 5-16 details all residential sites in this area.

Table 7 - Residential Capacity in Del Rio

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	57	114.35	0	0	131	131
Rezoned Sites	0	0.00	0	0	0	0
Total	**57**	**114.35**	**0**	**0**	**131**	**131**

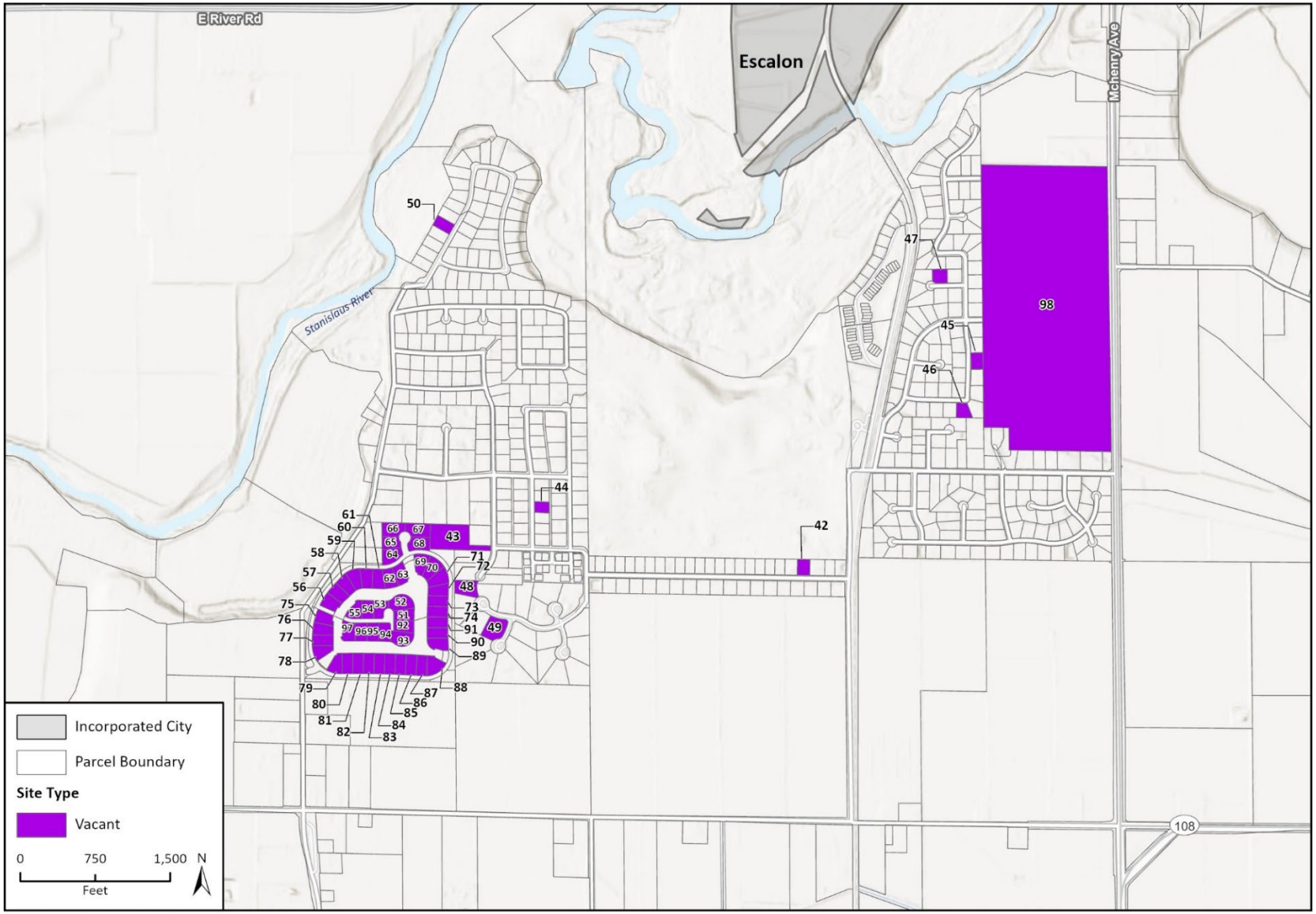
Due to limited sewer capacity, only rural residential development is proposed in the Del Rio area. The Sites Inventory identified 114.35 acres of vacant land across 57 sites in the Del Rio community, as shown in Figure 5-5 which can accommodate 131 housing units. All 131 units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning of the identified sites. The TCAC Resource categories for the sites in this community are Moderate.

Table 8 - Residential Sites in Del Rio

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
42	0 COUNTRY CLUB DR	004007051	0.46	Vacant	R-1	No Change	8.7	2	No	Moderate Resource	YES - Potential
43	HILLCREST DR	004059055	2.52	Vacant	R-A	No Change	5.4	8	No	Moderate Resource	YES - Potential
44	OAKMONT DR	004078015	0.38	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Potential
45	SPY GLASS DR	004085020	0.46	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Potential
46	7116 SPY GLASS DR	004085024	0.46	Vacant	R-A	No Change	2.2	1	No	Moderate Resource	YES - Potential
47	ATHERTON CT	004086026	0.47	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Potential
48	AVENIDA DEL RIO	004088004	0.79	Vacant	R-A	No Change	2.2	1	No	Moderate Resource	YES - Potential
49	CORTE DE ORO	004088007	1.00	Vacant	R-A	No Change	5.4	3	No	Moderate Resource	YES - Potential
50	7409 RIVER NINE DR	004093005	0.49	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
51	0 ISLE DR	004100001	0.53	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
52	0 ISLE DR	004100002	0.74	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
53	0 ISLE DR	004100003	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
54	0 ISLE DR	004100004	0.5	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
55	0 ISLE DR	004100005	0.5	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
56	0 LAGO CIR	004100006	0.52	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
57	0 LAGO CIR	004100007	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
58	0 LAGO CIR	004100008	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
59	0 LAGO CIR	004100009	0.52	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
60	0 LAGO CIR	004100010	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
61	0 LAGO CIR	004100011	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
62	0 LAGO CIR	004100012	0.54	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
63	0 LAGO CIR	004100013	0.55	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
64	0 MONUMENT CT	004100014	0.62	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
65	0 MONUMENT CT	004100015	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
66	0 MONUMENT CT	004100016	0.68	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
67	0 MONUMENT CT	004100017	0.75	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
68	0 MONUMENT CT	004100018	0.64	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
69	0 LAGO CIR	004100019	0.57	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
70	0 LAGO CIR	004100020	0.62	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
71	0 LAGO CIR	004100021	0.60	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
72	0 LAGO CIR	004100022	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
73	0 LAGO CIR	004100023	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
74	0 LAGO CIR	004100024	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
75	0 LAGO CIR	004101001	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
76	0 LAGO CIR	004101002	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
77	0 LAGO CIR	004101003	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
78	0 LAGO CIR	004101004	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
79	0 LAGO CIR	004101005	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
80	0 LAGO CIR	004101006	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
81	0 LAGO CIR	004101007	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
82	0 LAGO CIR	004101008	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
83	0 LAGO CIR	004101009	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
84	0 LAGO CIR	004101010	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
85	0 LAGO CIR	004101011	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
86	0 LAGO CIR	004101012	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
87	0 LAGO CIR	004101013	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
88	0 LAGO CIR	004101014	0.61	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
89	0 LAGO CIR	004101015	0.53	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
90	0 LAGO CIR	004101016	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
91	0 LAGO CIR	004101017	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
92	0 ISLE DR	004101018	0.53	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
93	0 ISLE DR	004101019	0.67	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
94	0 ISLE DR	004101020	0.51	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
95	0 ISLE DR	004101021	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
96	0 ISLE DR	004101022	0.50	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
97	0 ISLE DR	004101023	0.57	Vacant	P-D	No Change	PD	1	No	Moderate Resource	YES - Potential
98	7111 MC HENRY AVE	004102005	81.90	Vacant	P-D	No Change	PD	65	No	Moderate Resource	YES - Potential

Figure 4 - Sites Identified in Del Rio



Denair

Denair is a small community located east of Turlock. The majority of the community is zoned for residential and general agriculture, with increased densities concentrated around the commercial core along Main Street. All sites identified in the inventory are located within vacant parcels in the rural residential zone. Water and sewer service is provided by the Denair Community Services District. Table 5-17 summarizes available capacity in Denair and Table 5-16 details all residential sites in this area.

Table 9 - Residential Capacity in Denair

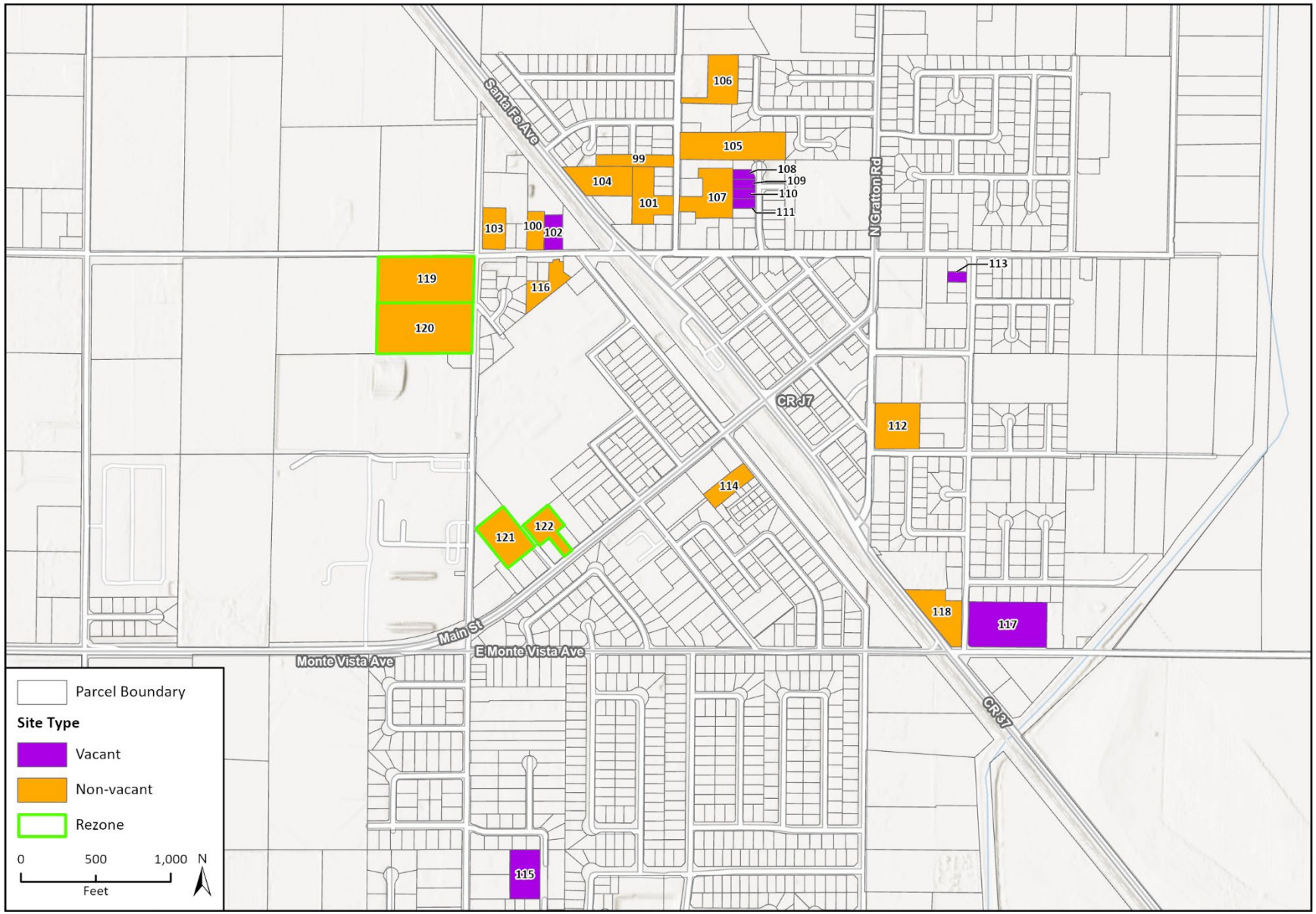
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	20	25.53	0	26	68	94
Rezoned Sites	4	12.41	127	13	0	140
Total	**24**	**37.94**	**127**	**39**	**68**	**234**

The Sites Inventory identified 20 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 94 housing units. Four properties totaling approximately 12 acres of land in Denair will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 140 housing units. Sites identified in Denair to accommodate a total of 234 housing units are shown in Figure 5-6). Of these 234 units, 127 units are assigned to the lower-income category, 39 units are assigned to the moderate-income category and 68 units are assigned to the above moderate-income category. Larger sites (i.e., between one and five acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community Low, Moderate, High, and Highest.

Table 10 - Residential Sites in Denair

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
99	4141 SPERRY RD	024014007	0.96	Single Family W/Extra Land	R-A	No Change	5.4	2	No	Moderate Resource	YES - Current
100	4109 ZEERING RD	024015003	0.68	Single Family W/Extra Land	R-2	No Change	14	4	No	Highest Resource	YES - Current
101	4109 SPERRY RD	024015010	1.67	Single Family W/Extra Land	R-A	No Change	5.4	4	No	Moderate Resource	YES - Current
102	4125 ZEERING RD	024015024	0.67	Vacant	R-2	No Change	14	7	No	Highest Resource	YES - Current
103	4009 ZEERING RD	024015026	0.99	Single Family W/Extra Land	R-2	No Change	14	5	No	Highest Resource	YES - Current
104	4140 N SANTA FE AVE	024015028	1.76	Single Family W/Extra Land	R-A	No Change	5.4	5	No	Moderate Resource	YES - Current
105	4216 SPERRY RD	024016004	2.99	Single Family W/Extra Land	R-A	No Change	5.4	9	No	Moderate Resource	YES - Current
106	4308 SPERRY RD	024016009	1.69	Single Family W/Extra Land	R-A	No Change	5.4	5	No	Moderate Resource	YES - Current
107	4100 SPERRY RD	024017003	2.00	Single Family W/Extra Land	R-A	No Change	5.4	6	No	Moderate Resource	YES - Current
108	4105 CHICA AVE	024017034	0.21	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
109	4101 CHICA AVE	024017035	0.22	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
110	4021 CHICA AVE	024017036	0.22	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
111	4017 CHICA AVE	024017037	0.22	Vacant	R-A	No Change	5.4	1	No	Moderate Resource	YES - Current
112	3640 GRATTON RD	024024016	2.10	Single Family W/Extra Land	R-A	No Change	5.4	6	No	Low Resource	YES - Current
113	3911 STORY RD	024024040	0.21	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Current
114	3613 MERCED AVE	024031035	0.95	Single Family W/Extra Land	R-3	No Change	25	9	No	Highest Resource	YES - Current
115	0 DERR RD	024050026	1.53	Vacant	R-A	No Change	5.4	5	No	High Resource	YES - Current
116	4124 E ZEERING RD	024059019	1.04	Single Family W/Extra Land	R-2	No Change	14	6	No	Highest Resource	YES - Current
117	3252 STORY RD	024053041	3.62	Vacant	R-A	No Change	5.4	12	No	Low Resource	YES - Current
118	3225 STORY RD	024025004	1.80	Single Family W/Extra Land	R-A	No Change	5.4	4	No	Low Resource	YES - Current
119	3833 LESTER RD	024012004	4.52	Single Family W/Extra Land	R-A	R-3	25	45	Yes	Highest Resource	YES - Current
120	3817 LESTER RD	024012005	4.94	Single Family W/Extra Land	R-A	R-3	25	49	Yes	Highest Resource	YES - Current
121	3325 KERN ST	024033002	1.84	Single Family W/Extra Land	R-A	R-3	25	29	Yes	Highest Resource	YES - Current
122	4165 MAIN ST	024033026	1.11	Single Family W/Extra Land	R-A	R-3	25	17	Yes	Highest Resource	YES - Current

Figure 5 - Sites Identified in Denair



Diablo Grande

Diablo Grande is a developing master-planned community in the hills southwest of Patterson. The sites identified in this cycle are in the northeast corner of the community. Household water and sewer utilities are provided by the Western Hills Water District. Table 5-19 summarizes available capacity in Diablo Grande and Table 5-20 details all residential sites in this area.

Table 11 - Residential Capacity in Diablo Grande

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

The Sites Inventory identified 112 vacant properties in Diablo Grande suitable for the development of 112 housing units during this housing cycle as shown in Figure 5-7. All 112 units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning, lower TCAC opportunity category scores, and environmental constraints of the identified sites. The TCAC Resource categories for the sites in this community are Low.

Table 12 - Residential Sites in Diablo Grande

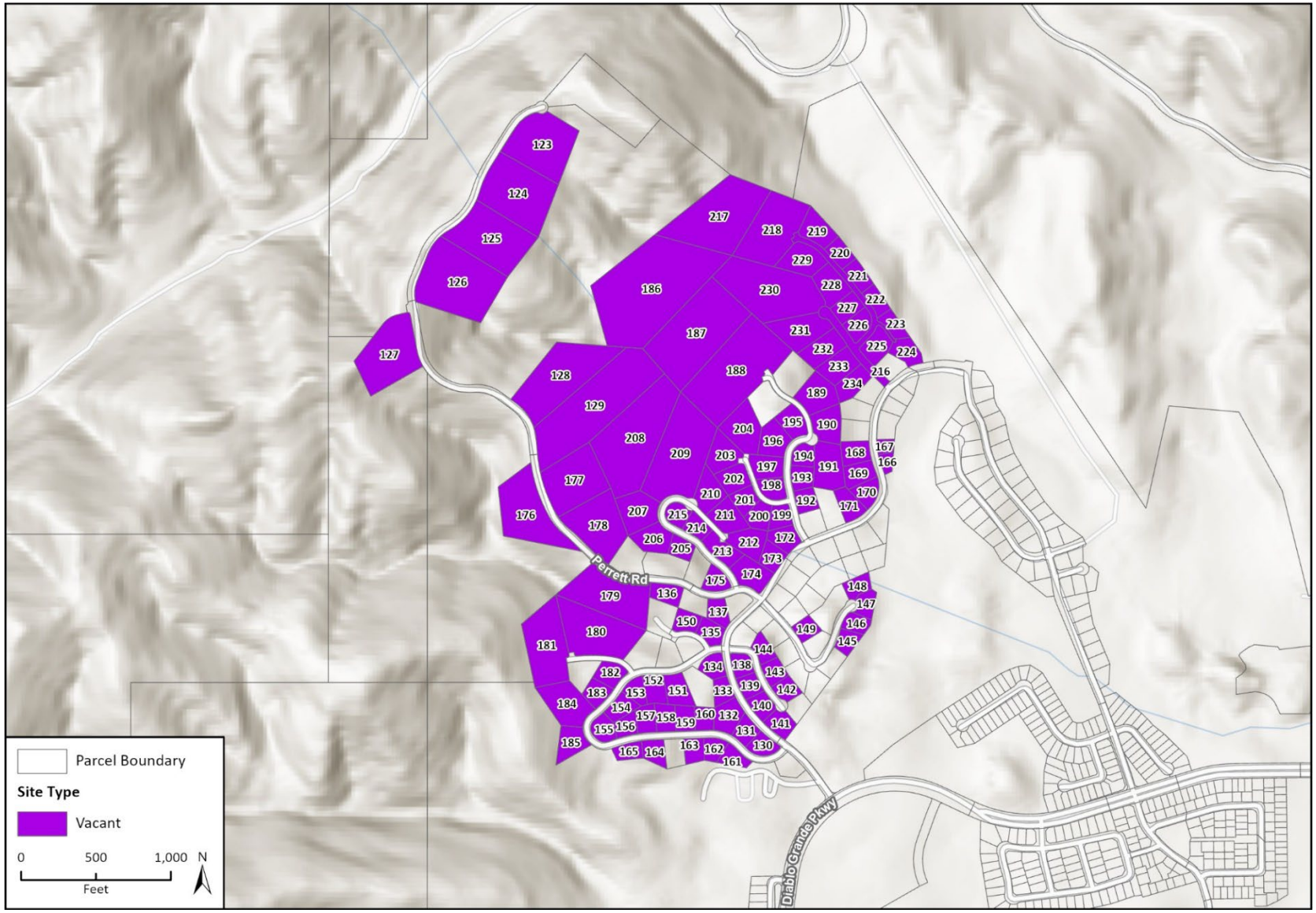
Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
123	0 PERRETT RD	025023003	3.45	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
124	0 PERRETT RD	025023004	3.99	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
125	0 PERRETT RD	025023005	3.68	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
126	0 PERRETT RD	025023006	4.95	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
127	0 PERRETT RD	025023007	3.41	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
128	0 PERRETT RD	025023009	4.39	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
129	0 PERRETT RD	025023010	6.71	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
130	20780 MORTON DAVIS CIR	025025002	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
131	9451 MORTON DAVIS DR	025025003	0.51	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
132	20740 MORTON DAVIS DR	025025004	0.80	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
133	9421 MORTON DAVIS DR	025025005	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
134	20420 MORTON DAVIS DR	025025006	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
135	0 MORTON DAVIS DR	025025007	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
136	9460 PERRETT RD	025025008	0.60	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
137	0 PERRETT RD	025025010	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
138	0 RUSS CT	025025012	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
139	0 RUSS CT	025025013	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
140	0 RUSS CT	025025014	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
141	0 RUSS CT	025025015	0.59	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
142	9321 RUSS CT	025025017	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
143	9341 RUSS CT	025025018	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
144	9361 RUSS CT	025025019	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
145	9240 FOXY CT	025025027	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
146	9220 FOXY CT	025025028	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
147	9200 FOXY CT	025025029	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
148	9201 FOXY CT	025025030	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
149	9321 FOXY CT	025025034	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
150	9541 BOAR HEAD LN	025025047	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
151	20460 MORTON DAVIS CIR	025025053	0.76	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
152	20480 MORTON DAVIS CIR	025025054	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
153	20500 MORTON DAVIS CIR	025025055	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
154	20520 MORTON DAVIS CIR	025025056	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
155	0 MORTON DAVIS CIR	025025057	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
156	20600 MORTON DAVIS CIR	025025058	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
157	20620 MORTON DAVIS CIR	025025059	0.54	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
158	20640 MORTON DAVIS CIR	025025060	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
159	20660 MORTON DAVIS CIR	025025061	0.50	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
160	20700 MORTON DAVIS CIR	025025062	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
161	0 MORTON DAVIS CIR	025025063	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
162	20739 MORTON DAVIS CIR	025025064	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
163	20661 MORTON DAVIS CIR	025025065	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
164	20621 MORTON DAVIS CIR	025025067	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
165	20601 MORTON DAVIS CIR	025025068	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
166	0 MORTON DAVIS DR	025026008	0.24	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
167	0 MORTON DAVIS DR	025026009	0.25	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
168	0 MORTON DAVIS DR	025026019	0.66	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
169	0 MORTON DAVIS DR	025026020	0.66	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
170	0 MORTON DAVIS DR	025026021	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
171	0 MORTON DAVIS DR	025026022	0.67	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
172	0 MORTON DAVIS DR	025026025	0.63	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
173	0 MORTON DAVIS DR	025026026	0.56	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
174	0 MORTON DAVIS DR	025026027	0.98	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
175	0 PERRETT RD	025026028	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
176	0 PERRETT RD	025027001	3.34	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
177	0 PERRETT RD	025027002	3.03	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
178	0 PERRETT RD	025027003	2.82	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
179	0 PERRETT RD	025027008	3.33	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
180	9661 SCHNEIDER LN	025027012	3.34	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
181	9691 SCHNEIDER LN	025027013	3.03	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
182	9600 SCHNEIDER LN	025027015	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
183	20521 MORTON DAVIS CIR	025027016	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
184	20541 MORTON DAVIS CIR	025027017	1.66	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
185	20561 MORTON DAVIS CIR	025027018	0.83	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
186	0 GRIFFITHS CT	025028007	9.12	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
187	0 GRIFFITHS CT	025028008	5.88	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
188	20081 GRIFFITHS CT	025028009	5.85	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
189	20120 GRIFFITHS CT	025028011	1.21	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
190	20140 GRIFFITHS CT	025028012	0.96	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
191	9461 GRIFFITHS CT	025028013	1.36	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
192	9321 GRIFFITHS LN	025028014	0.50	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
193	9411 GRIFFITHS LN	025028015	0.52	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
194	9431 GRIFFITHS LN	025028016	0.48	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
195	20121 GRIFFITHS LN	025028017	0.72	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
196	9440 GRIFFITHS LN	025028018	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
197	9420 GRIFFITHS LN	025028019	0.75	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
198	9400 GRIFFITHS LN	025028020	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
199	20281 DENIS LN	025028021	0.49	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
200	20261 DENIS LN	025028022	0.58	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
201	20241 DENIS LN	025028023	0.55	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
202	20221 DENIS LN	025028024	0.74	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
203	20201 DENIS LN	025028025	0.99	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
204	20200 DENIS LN	025028026	1.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
205	20401 PERRETT CT	025041001	0.48	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
206	20381 PERRETT CT	025041002	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
207	20371 PERRETT CT	025041003	1.35	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
208	20351 PERRETT CT	025041004	5.65	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
209	20341 PERRETT CT	025041005	4.76	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
210	20331 PERRETT CT	025041006	0.94	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
211	20321 PERRETT CT	025041007	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
212	20301 PERRETT CT	025041008	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
213	0 PERRETT CT	025041009	0.72	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
214	20340 PERRETT CT	025041010	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
215	0 PERRETT CT	025041011	0.48	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
216	0 WILD BOAR PL	025042002	1.77	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
217	19960 BOAR LN	025042004	4.88	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
218	20000 BOAR LN	025042005	3.29	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
219	20010 BOAR LN	025042006	0.89	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
220	20040 BOAR LN	025042007	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
221	20030 BOAR LN	025042008	0.53	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
222	20040 BOAR LN	025042009	0.46	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
223	9222 BOAR CT	025042010	0.47	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
224	9201 BOAR CT	025042011	0.65	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
225	9220 BOAR CT	025042012	0.77	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
226	9351 WILD BOAR PL	025042013	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
227	20035 WILD BOAR PL	025042014	0.61	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
228	20025 WILD BOAR PL	025042015	1.00	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
229	20015 WILD BOAR PL	025042016	1.14	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
230	9390 WILD BOAR PL	025042017	4.67	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
231	9370 WILD BOAR PL	025042018	1.57	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
232	9350 WILD BOAR PL	025042019	1.01	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
233	9340 WILD BOAR PL	025042020	0.92	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential
234	9320 WILD BOAR PL	025042021	0.75	Vacant	S-P	No Change	SP	1	No	Low Resource	YES - Potential

Figure 6 - Sites Identified in Diablo Grande



Empire

Empire is a community adjacent to the eastern boundary of the City of Modesto. The majority of the community is zoned for residential uses, with commercial uses concentrated along Yosemite Boulevard and Santa Fe Avenue. Water and sewer service is provided by the City of Modesto. Table 5-21 summarizes available capacity in Empire and Table 5-22 details all residential sites in this area.

Table 13 - Residential Capacity in Empire

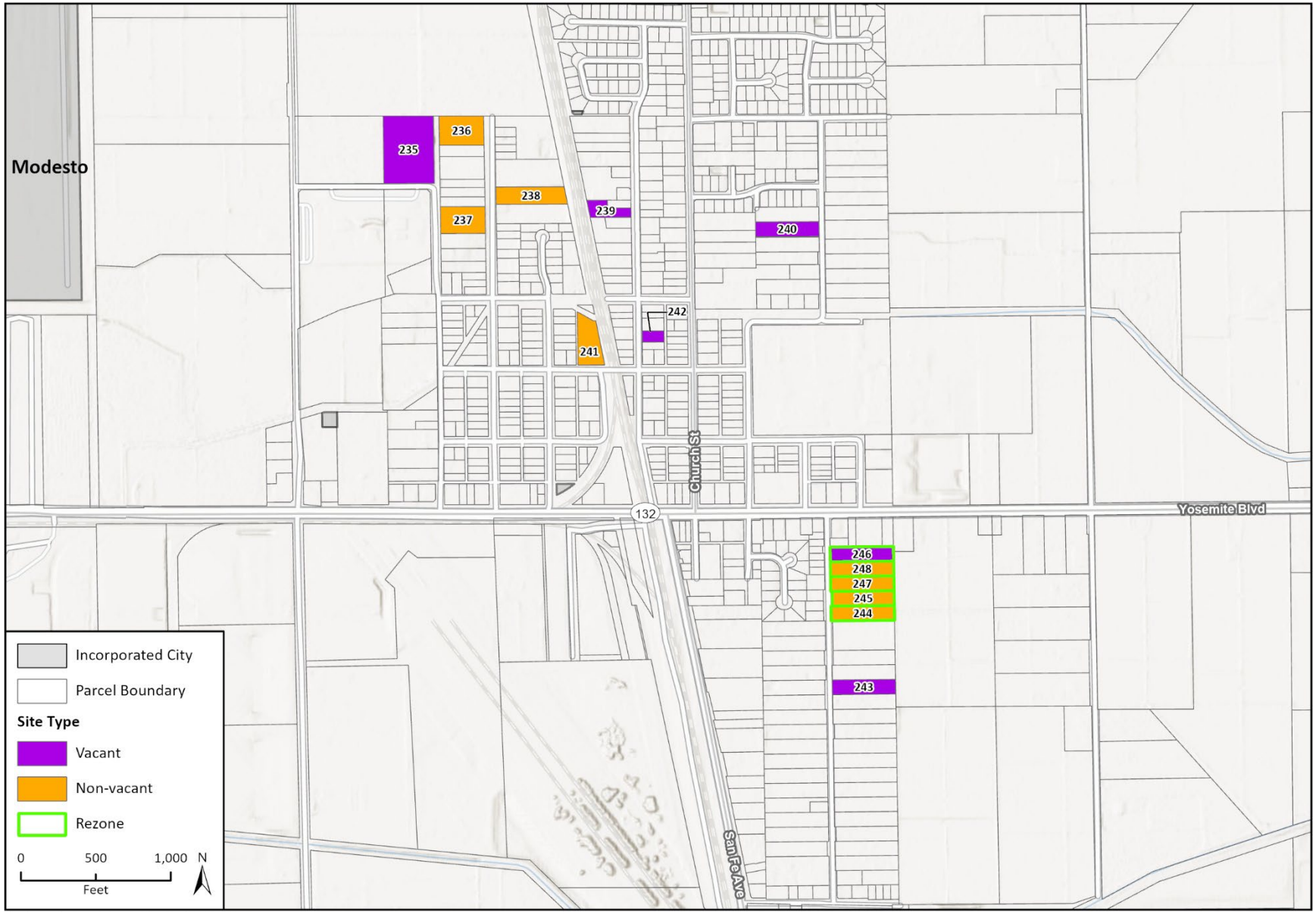
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	9	11.11	0	0	35	35
Rezoned Sites	5	4.77	17	46	8	71
Total	**14**	**15.88**	**17**	**46**	**43**	**106**

The Sites Inventory identified nine vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 35 housing units. Five parcels along Abbie Street with vacant land suitable for subdivision will be rezoned to allow residential development at 25 dwelling units per acre facilitating an estimated 71 housing units; one of the parcels identified for rezone is owned by the County and is currently vacant. Sites identified in Empire to accommodate a total of 106 housing units are shown in Figure 5-8. Of these 106 units, 17 units are assigned to the lower-income category, 46 units are assigned to the moderate-income category and 43 units are assigned to the above moderate-income category. Larger sites (i.e., between one and four acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

Table 14 - Residential Sites in Empire

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
235	FRAZINE RD	133001014	3.48	Vacant	R-A	No Change	5.4	11	No	Low Resource	YES - Current
236	451 B ST	133002001	1.33	Single Family W/Extra Land	R-A	No Change	5.4	2	No	Low Resource	YES - Current
237	401 B ST	133002018	1.23	Single Family W/Extra Land	R-1	No Change	8.7	6	No	Low Resource	YES - Current
238	420 B ST	133003007	1.24	Single Family W/Extra Land	R-A	No Change	5.4	3	No	Low Resource	YES - Current
239	401 E ST	133004039	0.56	Vacant	R-1	No Change	8.7	3	No	Low Resource	YES - Current
240	343 N ABBIE ST	133005008	0.96	Vacant	R-A	No Change	5.4	3	No	Low Resource	YES - Current
241	4841 2ND ST	133007045	1.10	Single Family W/Extra Land	R-1	No Change	8.7	5	No	Low Resource	YES - Current
242	E ST	133008027	0.25	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
243	0 S ABBIE ST	133017065	0.96	Vacant	R-A	No Change	2.2	1	No	Low Resource	YES - Current
244	124 S ABBIE ST	133017002	0.96	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
245	114 S ABBIE ST	133017003	0.93	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
246	18 S ABBIE ST	133017006	0.96	Vacant	R-A	R-3	25	19	Yes	Low Resource	YES - Current
247	100 S ABBIE ST	133017004	0.96	Multi-family w/ Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
248	32 S ABBIE ST	133017005	0.96	Multi-family w/ Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current

Figure 7 - Sites Identified in Empire



Grayson

Grayson is a small community located northeast of the intersection of Highway 33 and Grayson Road, in the western portion of Stanislaus County. The majority of the community is zoned single-family residential. The City of Modesto serves Grayson with household water and the Grayson Community Service District provides sewer service. The City of Modesto is upgrading and expanding the aging potable water infrastructure in Grayson and anticipates completion of capital improvements by the end of 2025. Table 5-23 summarizes available capacity in Grayson and Table 5-24 details all residential sites in this area.

Table 15 - Residential Capacity in Grayson

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	4	1.41	0	0	6	6
Rezoned Sites	0	0.00	0	0	0	0
Total	**4**	**1.41**	**0**	**0**	**6**	**6**

Due to the age and limited capacity the existing sewer system for additional multifamily development in Grayson, no sites are proposed for rezoning. The Sites Inventory identified 1.41 acres of vacant land zoned for single-family residential suitable to accommodate six housing units on four sites. Figure 5-9 shows sites identified in Grayson. All six units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning and lower TCAC opportunity category scores of the identified sites. The TCAC Resource categories for the sites in this community are Low.

Table 16 - Residential Sites in Grayson

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
249	8517 LAIRD ST	016027003	0.26	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential
250	8609 WILSON ST	016027021	0.36	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential
251	8512 LAIRD ST	016028002	0.68	Vacant	R-1	No Change	8.7	3	No	Low Resource	YES - Potential
252	0 AMELIA ST	016028059	0.11	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential

Table 14 - Residential Sites in Empire

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
235	FRAZINE RD	133001014	3.48	Vacant	R-A	No Change	5.4	11	No	Low Resource	YES - Current
236	451 B ST	133002001	1.33	Single Family W/Extra Land	R-A	No Change	5.4	2	No	Low Resource	YES - Current
237	401 B ST	133002018	1.23	Single Family W/Extra Land	R-1	No Change	8.7	6	No	Low Resource	YES - Current
238	420 B ST	133003007	1.24	Single Family W/Extra Land	R-A	No Change	5.4	3	No	Low Resource	YES - Current
239	401 E ST	133004039	0.56	Vacant	R-1	No Change	8.7	3	No	Low Resource	YES - Current
240	343 N ABBIE ST	133005008	0.96	Vacant	R-A	No Change	5.4	3	No	Low Resource	YES - Current
241	4841 2ND ST	133007045	1.10	Single Family W/Extra Land	R-1	No Change	8.7	5	No	Low Resource	YES - Current
242	E ST	133008027	0.25	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
243	0 S ABBIE ST	133017065	0.96	Vacant	R-A	No Change	2.2	1	No	Low Resource	YES - Current
244	124 S ABBIE ST	133017002	0.96	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
245	114 S ABBIE ST	133017003	0.93	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
246	18 S ABBIE ST	133017006	0.96	Vacant	R-A	R-3	25	19	Yes	Low Resource	YES - Current
247	100 S ABBIE ST	133017004	0.96	Multi-family w/ Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current
248	32 S ABBIE ST	133017005	0.96	Multi-family w/ Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Current

Table 16 - Residential Sites in Grayson

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
249	8517 LAIRD ST	016027003	0.26	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential
250	8609 WILSON ST	016027021	0.36	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential
251	8512 LAIRD ST	016028002	0.68	Vacant	R-1	No Change	8.7	3	No	Low Resource	YES - Potential
252	0 AMELIA ST	016028059	0.11	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Potential

Figure 8 - Sites Identified in Grayson

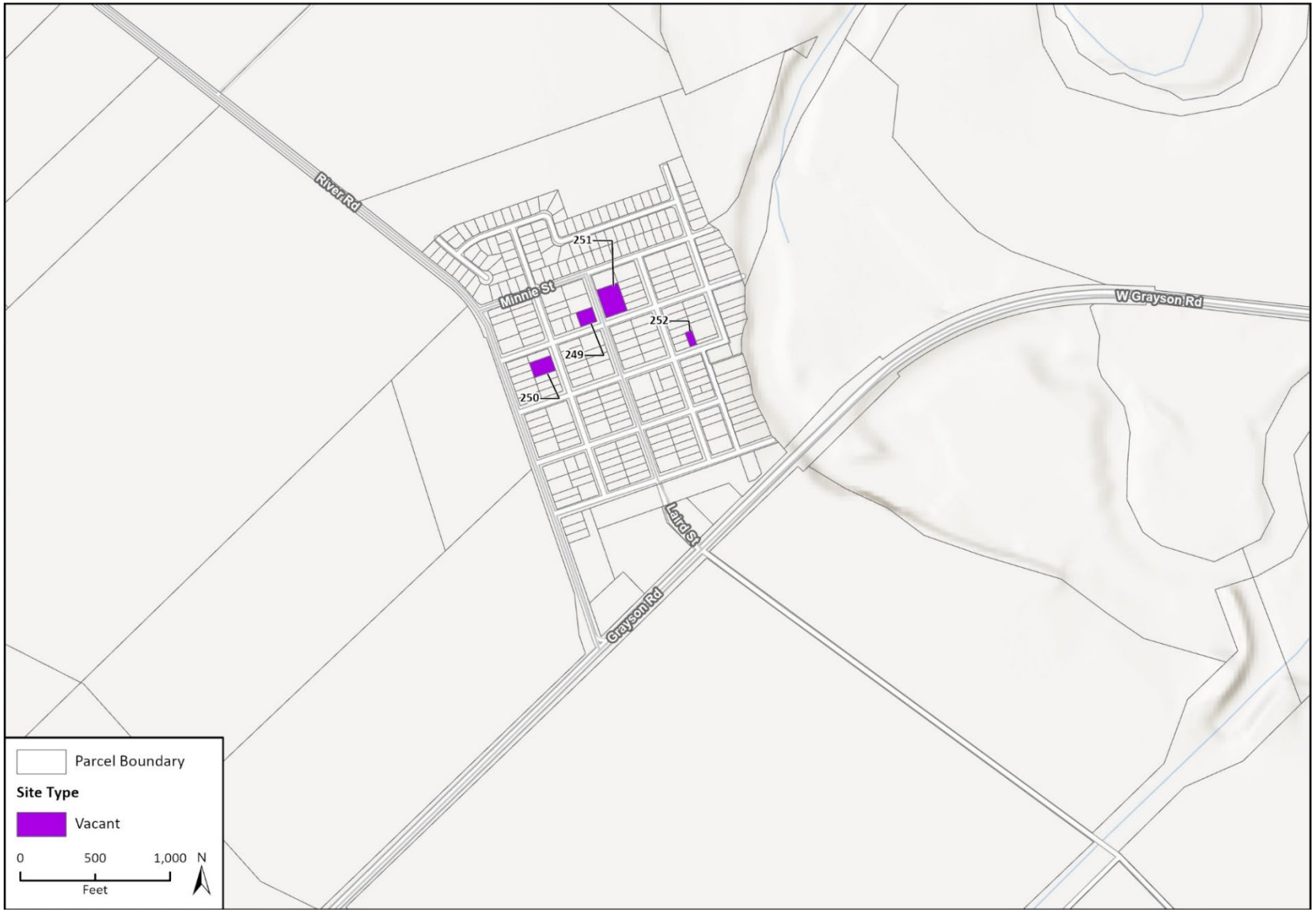
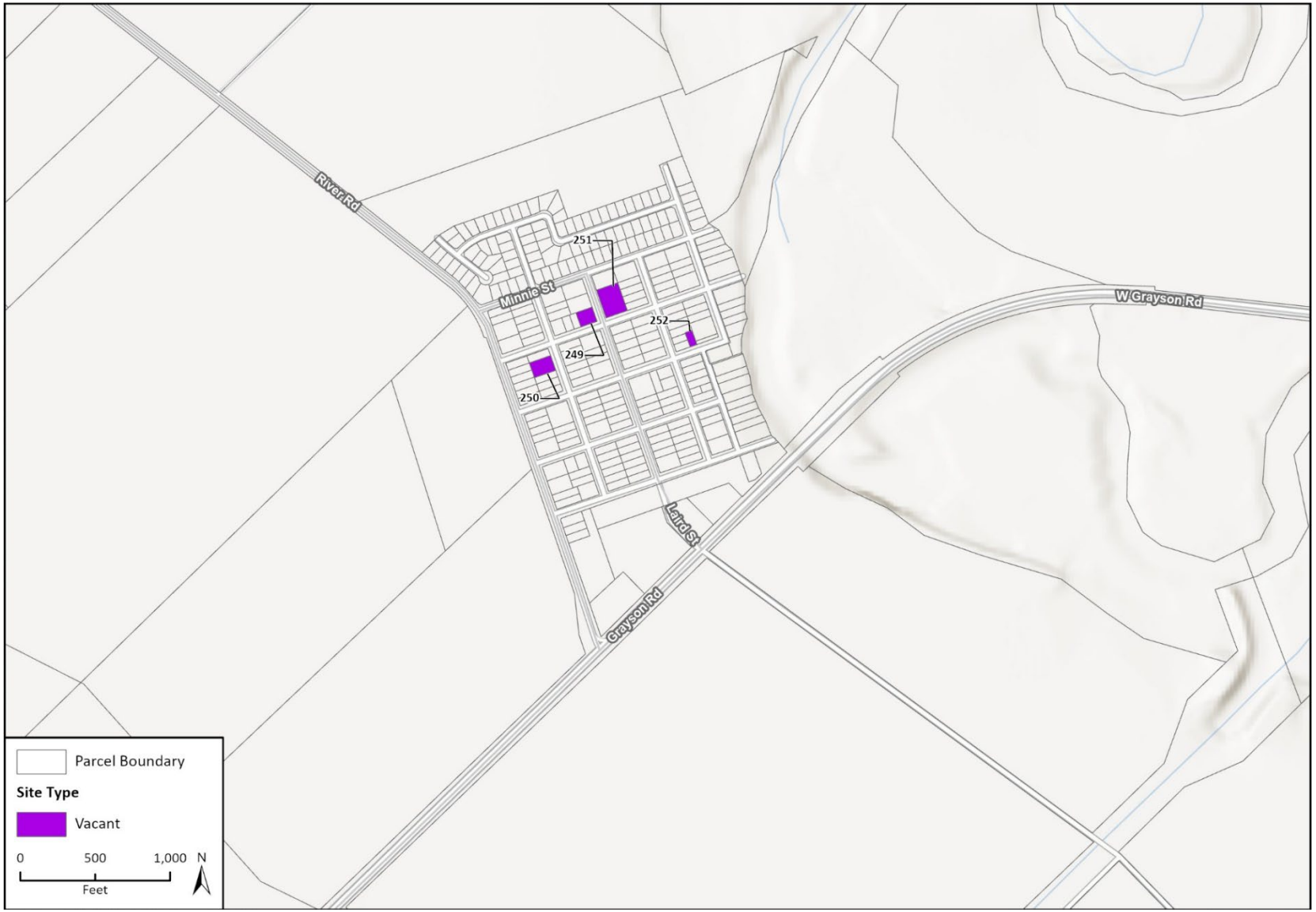


Figure 8 - Sites Identified in Grayson



Hickman

Hickman is a small community located just south of Waterford. The community is mostly zoned for residential, planned development, or agricultural uses. The City of Waterford provides domestic water service and wastewater is handled by package treatment and individual septic systems. Table 5-25 summarizes available capacity in Hickman and Table 5-26 details all residential sites in this area.

Table 17 - Residential Capacity in Hickman

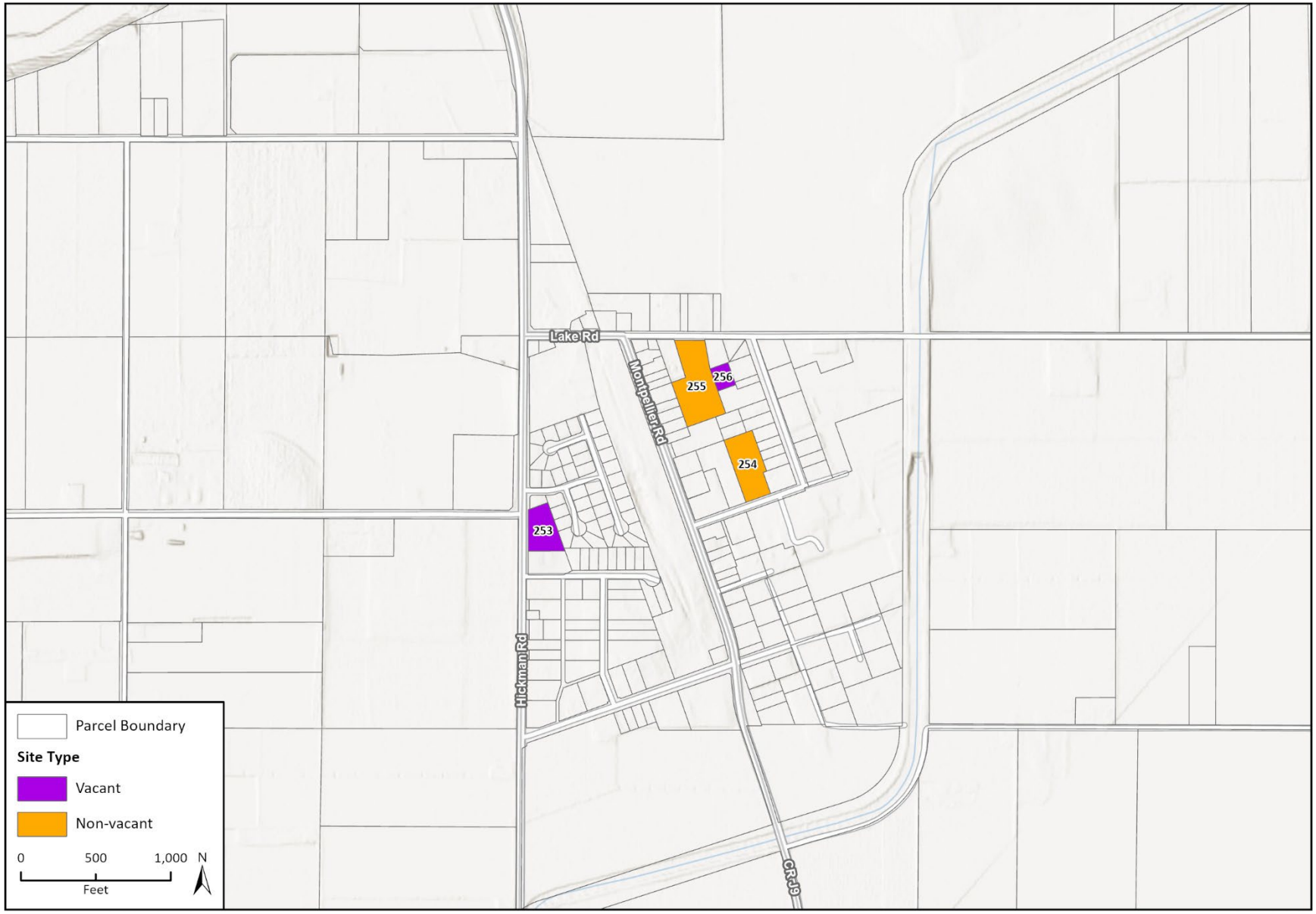
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	4	6.65	0	0	19	19
Rezoned Sites	0	0.00	0	0	0	0
Total	**4**	**6.65**	**0**	**0**	**19**	**19**

Due to limited sewer capacity, no rezoning is proposed in Hickman. The Sites Inventory identified 6.65 acres across four vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 19 housing units on four sites. Figure 5-10 shows sites identified in Hickman. All 19 units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning of the identified sites. The TCAC Resource categories for the sites in this community Low and High.

Table 18 - Residential Sites in Hickman

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
253	910 HICKMAN RD	019042064	1.33	Vacant	R-1	No Change	8.7	7	No	High Resource	YES - Potential
254	13255 4TH ST	019045037	1.93	Single Family W/Extra Land	R-A	No Change	5.4	5	No	Low Resource	YES - Potential
255	13248 LAKE RD	019045056	2.93	Single Family W/Extra Land	R-A	No Change	5.4	6	No	Low Resource	YES - Potential
256	0 LAKE RD	019045057	0.46	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Potential

Figure 9 - Sites Identified in Hickman



Keyes

Keyes is a community located east of State Route 99 between Ceres and Turlock. The majority of the community is zoned for single-family residential with a multifamily district along Anna Avenue and Highway Commercial along 7th Street. Keyes has both public water and sewer available through the Keyes Community Services District. Table 5-27 summarizes available capacity in Keyes and Table 5-28 details all residential sites in this area.

Table 19 - Residential Capacity in Keyes

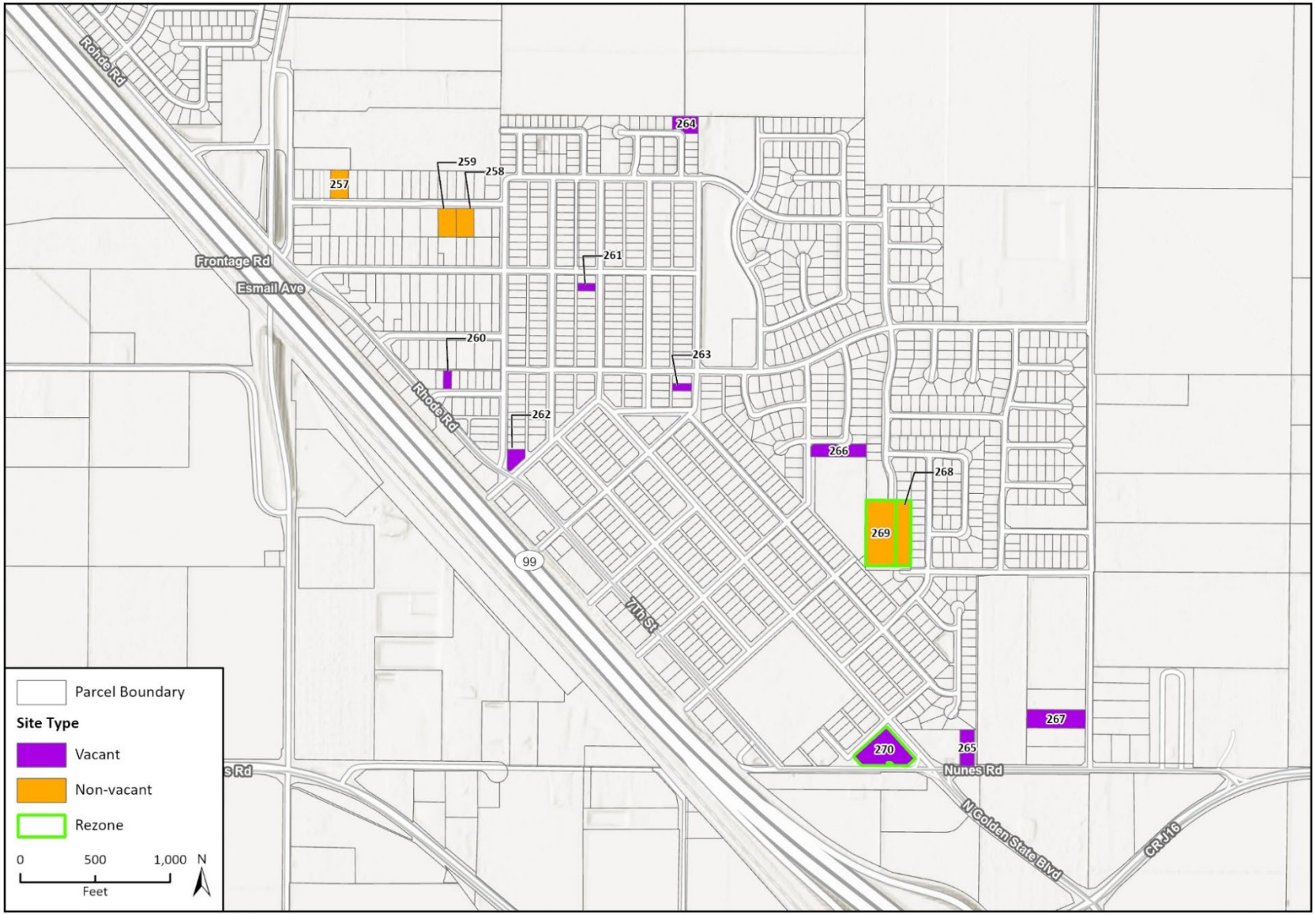
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	11	5.05	0	20	16	36
Rezoned Sites	3	4.45	58	18	2	78
Total	**14**	**9.5**	**58**	**38**	**18**	**114**

The Sites Inventory identified 11 vacant and single family home sites with significant undeveloped land suitable for subdivision to accommodate 36 housing units. Three properties totaling approximately four acres of land in Keyes will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 78 housing units. Including the proposed rezoning, an estimated 114 housing units are projected on the sites in Keyes shown in Figure 5-11. Of these 114 units, 58 units are assigned the lower-income category, 38 units are assigned to the moderate-income category and 18 units are assigned to the above moderate-income category. Larger sites (i.e., between one and two acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are High. Four sites do not have sufficient data to determine TCAC category.

Table 20 - Residential Sites in Keyes

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
257	4021 ANNA AVE	045014004	0.52	Single Family W/Extra Land	R-3	No Change	25	6	No	High Resource	YES - Current
258	4212 ANNA AVE	045014015	0.52	Single Family W/Extra Land	R-3	No Change	25	5	No	Insufficient Data	YES - Current
259	4204 ANNA AVE	045014016	0.53	Single Family W/Extra Land	R-3	No Change	25	5	No	Insufficient Data	YES - Current
260	4205 LUCINDA AVE	045016004	0.15	Vacant	R-1	No Change	8.7	1	No	Insufficient Data	YES - Current
261	5305 9TH ST	045019014	0.14	Vacant	R-1	No Change	8.7	1	No	High Resource	YES - Current
262	4305 LIZZIE AVE	045020001	0.29	Vacant	R-1	No Change	8.7	1	No	Insufficient Data	YES - Current
263	5405 10TH ST	045020046	0.15	Vacant	R-1	No Change	8.7	1	No	High Resource	YES - Current
264	BLACKBERRY WAY	045064073	0.41	Vacant	R-1	No Change	8.7	2	No	High Resource	YES - Current
265	4821 NUNES RD	045065001	0.53	Vacant	R-3	No Change	25	8	No	High Resource	YES - Current
266	0 BRIANNA AVE	045066059	0.70	Vacant	R-1	No Change	8.7	3	No	High Resource	YES - Current
267	5911 WASHINGTON RD	045071002	1.11	Vacant	R-A	No Change	5.4	3	No	High Resource	YES - Current
268	4701 NORMA WAY	045021019	1.00	Single Family W/Extra Land	R-1	R-3	25	14	Yes	High Resource	YES - Current
269	4701 MAUD AVE	045021020	2.00	Single Family W/Extra Land	R-1	R-3	25	35	Yes	High Resource	YES - Current
270	0 9TH ST	045033007	1.45	Vacant	H-1	R-3	25	29	Yes	Insufficient Data	YES - Current

Figure 10 - Sites Identified in Keyes



North Ceres

North Ceres is an urbanized area adjacent to the northern boundary of the City of Ceres within the City's sphere of influence. The Sites Inventory groups together the Bystrom, Ceres-River Road, Hatch/Stonum, and Ceres/Herndon neighborhoods into the "North Ceres" area. Water service is provided to portions of the unincorporated North Ceres area by both the cities of Modesto and Ceres and sewer service by the City of Ceres. The area is bordered along the north by the Tuolumne River Regional Park (TRRP), 100 acres of parkland that runs along seven river miles of the Tuolumne River. The South Ceres area connects to the City of Modesto via the 9th Street Bridge which is a gateway into Modesto's downtown. Stanislaus County has been awarded a Caltrans Sustainable Transportation Planning Grant for the 9th Steet Corridor to address problems with land use compatibility, pedestrian/bike access (lack of sidewalks and bike lanes), and stormwater facilities improvements. The planning effort will include opportunities for expand residential units within the corridor area. Table 5-29 summarizes available capacity in the North Ceres neighborhood and Table 5-30 details all residential sites in this area.

Table 21 - Residential Capacity in North Ceres

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	18	9.36	0	39	25	64
Rezoned Sites	4	7.97	97	18	1	116
Total	**22**	**17.33**	**97**	**57**	**26**	**180**

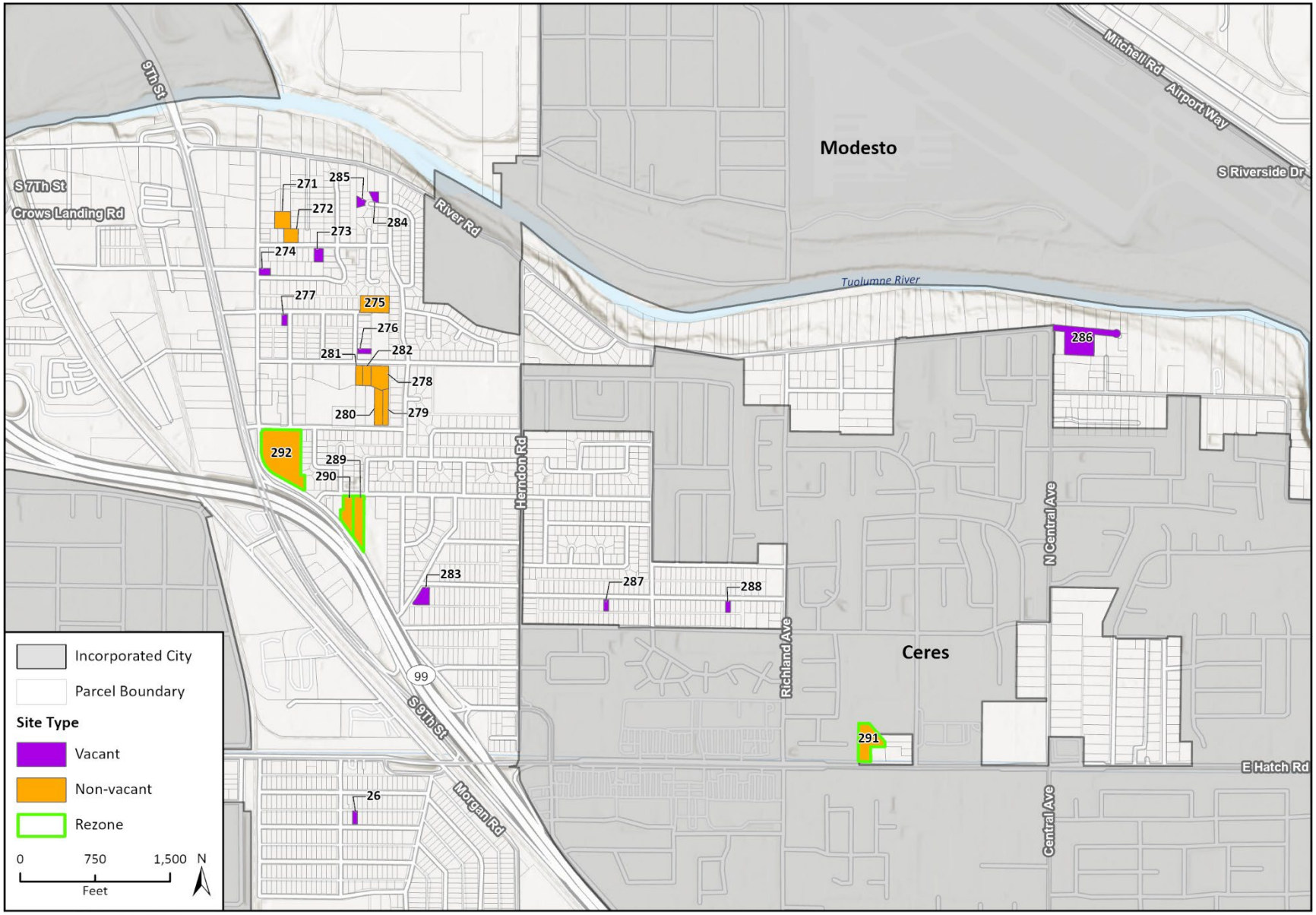
The Sites Inventory identified 22 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate 64 housing units. Many of these sites are small and already zoned for multifamily residential. Four properties totaling approximately 8 acres of land in North Ceres will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 116 housing units. Including the proposed rezoning, an estimated 180 housing units are projected on the sites in North Ceres shown in Figure 5-12. Of these 180 units, 97 units are assigned the lower-income category, 57 units are assigned to the moderate-income category and 26 units are assigned to the above moderate-income category. Larger sites (i.e., between 0.5 and five acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are designated High Segregation and Poverty, Low, and High.

Table 22 - Residential Sites in North Ceres

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
271	456 BYSTRUM RD	038008009	0.62	Single Family W/Extra Land	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
272	805 SOUZA AVE	038011006	0.46	Single Family W/Extra Land	R-3	No Change	25	5	No	High Segregation and Poverty	YES - Current
273	818 SOUZA AVE	038011010	0.29	Vacant	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
274	703 ERICKSON AVE	038011020	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
275	901 LOMBARDO AVE	038015018	1.13	Single Family W/Extra Land	R-A	No Change	5.4	3	No	High Segregation and Poverty	YES - Current
276	PERFIDIA AVE	038015022	0.16	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
277	720 LOMBARDO AVE	038015039	0.14	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
278	916 SONORA AVE	038016008	0.92	Single Family W/Extra Land	R-3	No Change	25	10	No	High Segregation and Poverty	YES - Current
279	923 LATIMER AVE	038016009	0.47	Single Family W/Extra Land	R-3	No Change	25	5	No	High Segregation and Poverty	YES - Current
280	915 LATIMER AVE	038016010	0.70	Single Family W/Extra Land	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
281	850 SONORA AVE	038016045	0.33	Single Family W/Extra Land	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
282	854 SONORA AVE	038016046	0.39	Single Family W/Extra Land	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
283	1102 LEO AVE	038042001	0.49	Vacant	R-1	No Change	8.7	2	No	High Segregation and Poverty	YES - Current
284	PARSONS CT	038051005	0.18	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
285	PARSONS CT	038051007	0.17	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
286	LIVE OAK CT	039005032	2.47	Vacant	R-A	No Change	5.4	5	No	High Resource	YES - Current
287	1414 HOLM AVE	039030033	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
288	1620 HOLM AVE	039031055	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
289	854 PECOS AVE	038039016	1.19	Single Family W/Extra Land	R-A	R-3	25	22	Yes	High Segregation and Poverty	YES - Current
290	838 PECOS AVE	038039031	0.87	Single Family W/Extra Land	R-A	R-3	25	10	Yes	High Segregation and Poverty	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
291	1809 E HATCH RD	039025019	1.51	Single Family W/Extra Land	R-A	R-3	25	22	Yes	Low Resource	YES - Current
292	822 BYSTRUM RD	038017041	4.40	Mobile home Parks	P-D	R-3	25	62	Yes	High Segregation and Poverty	YES - Current

Figure 11 - Sites Identified in North Ceres



East Oakdale

East Oakdale is an urbanized area located east of the City of Oakdale off State Highway 120. The area is mostly rural residential surrounded by agricultural operations. Domestic water services are provided by the Oakdale Irrigation District and wastewater is handled with a combination of private septic and package treatment systems. Table 5-31 summarizes available capacity in East Oakdale and Table 5-32 details all residential sites in this area.

Table 23 - Residential Capacity in East Oakdale

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	51	148.23	0	0	161	161
Rezoned Sites	0	0.00	0	0	0	0
Total	**51**	**148.23**	**0**	**0**	**161**	**161**

Due to limited sewer capacity, no rezoning is proposed in East Oakdale. The Sites Inventory identified approximately 148 acres across 51 vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate an estimated 161 housing units on 51 sites. Figure 5-13 shows sites identified in East Oakdale. All 161 units are assigned to the above moderate-income category. The TCAC Resource categories for the sites in this community range from High to Highest.

Table 24 - Residential Sites in East Oakdale

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
293	0 SARATOGA HILLS DR	002022038	3.25	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
294	OAK VIEW DR	006081099	3.01	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
295	RODDEN RD	010001078	5.85	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
296	11727 RODDEN RD	010001079	9.71	Single Family W/Extra Land	R-A	No Change	0.33	2	No	Highest Resource	YES - Potential
297	RODDEN RD	010003008	3.67	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
298	0 GRAY RD	010009002	6.80	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
299	0 GRAY RD	010009036	4.68	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
300	LANCASTER RD	010012022	3.15	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
301	13124 LANCASTER RD	010012034	2.85	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
302	0 LANCASTER RD	010012042	2.82	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
303	12919 LANCASTER RD	010012043	2.75	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
304	0 LANCASTER RD	010012044	2.49	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
305	10661 DIXON RD	010021095	30.05	Single Family W/Extra Land	R-A	No Change	2.2	48	No	Highest Resource	YES - Potential
306	9821 BLACK OAK CT	010025104	1.05	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
307	9817 BLACK OAK CT	010025105	1.20	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
308	0 BLACK OAK CT	010025109	0.74	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
309	RIVER OAK CIR	010030023	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
310	SOMMER PL	010033042	0.28	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
311	11761 ORANGE BLOSSOM RD	010034026	1.06	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
312	DIXON RD	010050001	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
313	BUCKMEADOWS DR	010052003	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
314	BUCKMEADOWS DR	010052004	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
315	ORANGE BLOSSOM RD	010057007	0.61	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
316	0 CIMARRON TRAIL	010065007	2.69	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
317	11320 WILD OAK CT	010068016	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
318	FOX BOROUGH CT	010069009	0.56	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential

Table 2 - Residential Sites in Airport

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
2	1409 MONO DR	035027020	0.45	Vacant	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
3	TENAYA DR	035034011	0.19	Vacant	R-3	No Change	25	3	No	High Segregation and Poverty	YES - Current
4	507 KERR AVE	035038017	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
5	505 KERR AVE	035038018	0.15	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
6	409 EMPIRE AVE	035039005	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
7	430 THRASHER AVE	035039019	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
8	419 S CONEJO AVE	035040025	0.28	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current

Table 24 - Residential Sites in East Oakdale

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
293	0 SARATOGA HILLS DR	002022038	3.25	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
294	OAK VIEW DR	006081099	3.01	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
295	RODDEN RD	010001078	5.85	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
296	11727 RODDEN RD	010001079	9.71	Single Family W/Extra Land	R-A	No Change	0.33	2	No	Highest Resource	YES - Potential
297	RODDEN RD	010003008	3.67	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
298	0 GRAY RD	010009002	6.80	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
299	0 GRAY RD	010009036	4.68	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
300	LANCASTER RD	010012022	3.15	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
301	13124 LANCASTER RD	010012034	2.85	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
302	0 LANCASTER RD	010012042	2.82	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
303	12919 LANCASTER RD	010012043	2.75	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
304	0 LANCASTER RD	010012044	2.49	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
305	10661 DIXON RD	010021095	30.05	Single Family W/Extra Land	R-A	No Change	2.2	48	No	Highest Resource	YES - Potential
306	9821 BLACK OAK CT	010025104	1.05	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
307	9817 BLACK OAK CT	010025105	1.20	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
308	0 BLACK OAK CT	010025109	0.74	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
309	RIVER OAK CIR	010030023	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
310	SOMMER PL	010033042	0.28	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
311	11761 ORANGE BLOSSOM RD	010034026	1.06	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
312	DIXON RD	010050001	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
313	BUCKMEADOWS DR	010052003	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
314	BUCKMEADOWS DR	010052004	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
315	ORANGE BLOSSOM RD	010057007	0.61	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
316	0 CIMARRON TRAIL	010065007	2.69	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
317	11320 WILD OAK CT	010068016	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
318	FOX BOROUGH CT	010069009	0.56	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential

Table 2 - Residential Sites in Airport

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
2	1409 MONO DR	035027020	0.45	Vacant	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
3	TENAYA DR	035034011	0.19	Vacant	R-3	No Change	25	3	No	High Segregation and Poverty	YES - Current
4	507 KERR AVE	035038017	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
5	505 KERR AVE	035038018	0.15	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
6	409 EMPIRE AVE	035039005	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
7	430 THRASHER AVE	035039019	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
8	419 S CONEJO AVE	035040025	0.28	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current

Table 4 - Residential Sites in Bret Harte

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
9	CRATER AVE	038023014	1.18	Vacant	R-1	No Change	8.7	6	No	Low Resource	YES - Current
10	200 CRATER AVE	038026011	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
11	201 GLACIER AVE	038026012	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
12	200 GLACIER AVE	038026033	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
13	1534 EUREKA ST	056011022	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
14	1529 SPOKANE ST	056012010	0.18	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
15	1607 PORTLAND AVE	056014003	0.28	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
16	1744 SEATTLE ST	056019051	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
17	1825 SPOKANE ST	056020009	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
18	1818 DENVER ST	056021026	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
19	1760 DALLAS ST	056023033	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
20	TUCSON & LASSEN AVE	056034002	0.26	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
21	1604 GLENN AVE	056037032	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
22	1228 IMPERIAL AVE	056039010	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
23	1231 LASSEN AVE	056040024	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
24	1406 LASSEN AVE	056040035	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
25	401 IMPERIAL AVE	056047020	0.22	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
26	909 DOVER AVE	086004052	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
27	1511 CROWS LANDING RD	056011028	0.77	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current
28	1627 CROWS LANDING RD	056017021	2.03	Commercial	C-2	MU	25	40	Yes	Low Resource	YES - Current
29	1715 CROWS LANDING RD	056018002	0.93	Commercial	C-2	MU	25	18	Yes	Low Resource	YES - Current
30	1943 CROWS LANDING RD	056048052	0.75	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current

Table 4 - Residential Sites in Bret Harte

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
9	CRATER AVE	038023014	1.18	Vacant	R-1	No Change	8.7	6	No	Low Resource	YES - Current
10	200 CRATER AVE	038026011	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
11	201 GLACIER AVE	038026012	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
12	200 GLACIER AVE	038026033	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
13	1534 EUREKA ST	056011022	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
14	1529 SPOKANE ST	056012010	0.18	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
15	1607 PORTLAND AVE	056014003	0.28	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
16	1744 SEATTLE ST	056019051	0.19	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
17	1825 SPOKANE ST	056020009	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
18	1818 DENVER ST	056021026	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
19	1760 DALLAS ST	056023033	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
20	TUCSON & LASSEN AVE	056034002	0.26	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
21	1604 GLENN AVE	056037032	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
22	1228 IMPERIAL AVE	056039010	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
23	1231 LASSEN AVE	056040024	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
24	1406 LASSEN AVE	056040035	0.14	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
25	401 IMPERIAL AVE	056047020	0.22	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
26	909 DOVER AVE	086004052	0.15	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
27	1511 CROWS LANDING RD	056011028	0.77	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current
28	1627 CROWS LANDING RD	056017021	2.03	Commercial	C-2	MU	25	40	Yes	Low Resource	YES - Current
29	1715 CROWS LANDING RD	056018002	0.93	Commercial	C-2	MU	25	18	Yes	Low Resource	YES - Current
30	1943 CROWS LANDING RD	056048052	0.75	Commercial	C-2	MU	25	15	Yes	Low Resource	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
31	1540 CROWS LANDING RD	086010034	0.82	Vacant	C-2	MU	25	16	Yes	Low Resource	YES - Current
32	TUCSON AVE	056032069	4.32	Vacant	R-1	R-3	25	86	Yes	Low Resource	YES - Current
33	TUCSON AVE	056033049	7.12	Vacant	R-1	R-3	25	142	Yes	Low Resource	YES - Current
34	LASSEN & MARIN AVE	056034001	5.10	Vacant	R-1	R-3	25	102	Yes	Low Resource	YES - Current
35	LASSEN & INYO AVE	056035001	5.55	Vacant	R-1	R-3	25	111	Yes	Low Resource	YES - Current
36	YUMA & TUCSON AVE	056036036	2.28	Vacant	R-1	R-3	25	45	Yes	Low Resource	YES - Current

Figure 2 - Sites Identified in Bret Harte

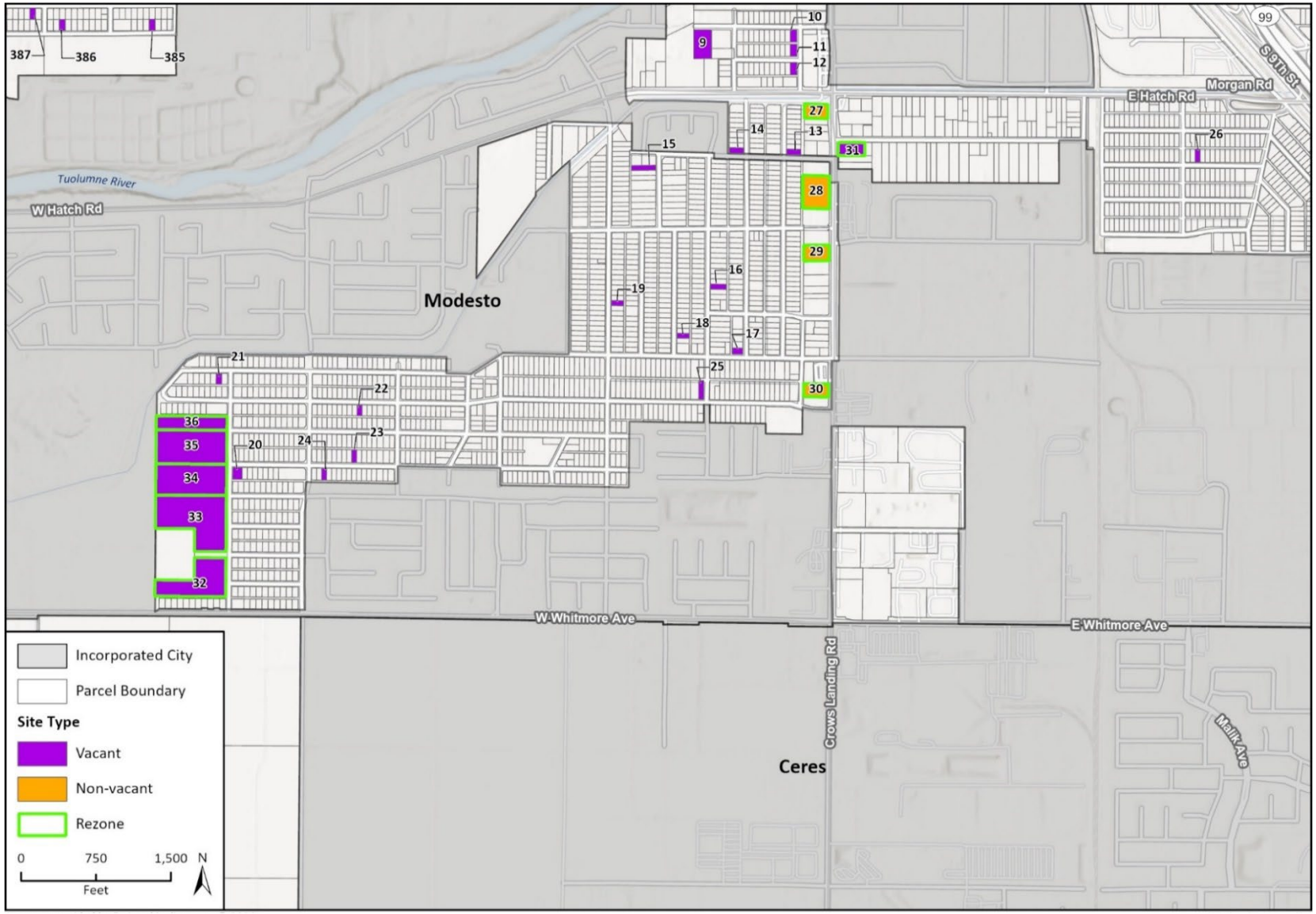


Figure 3 - Sites Identified in Crow's Landing

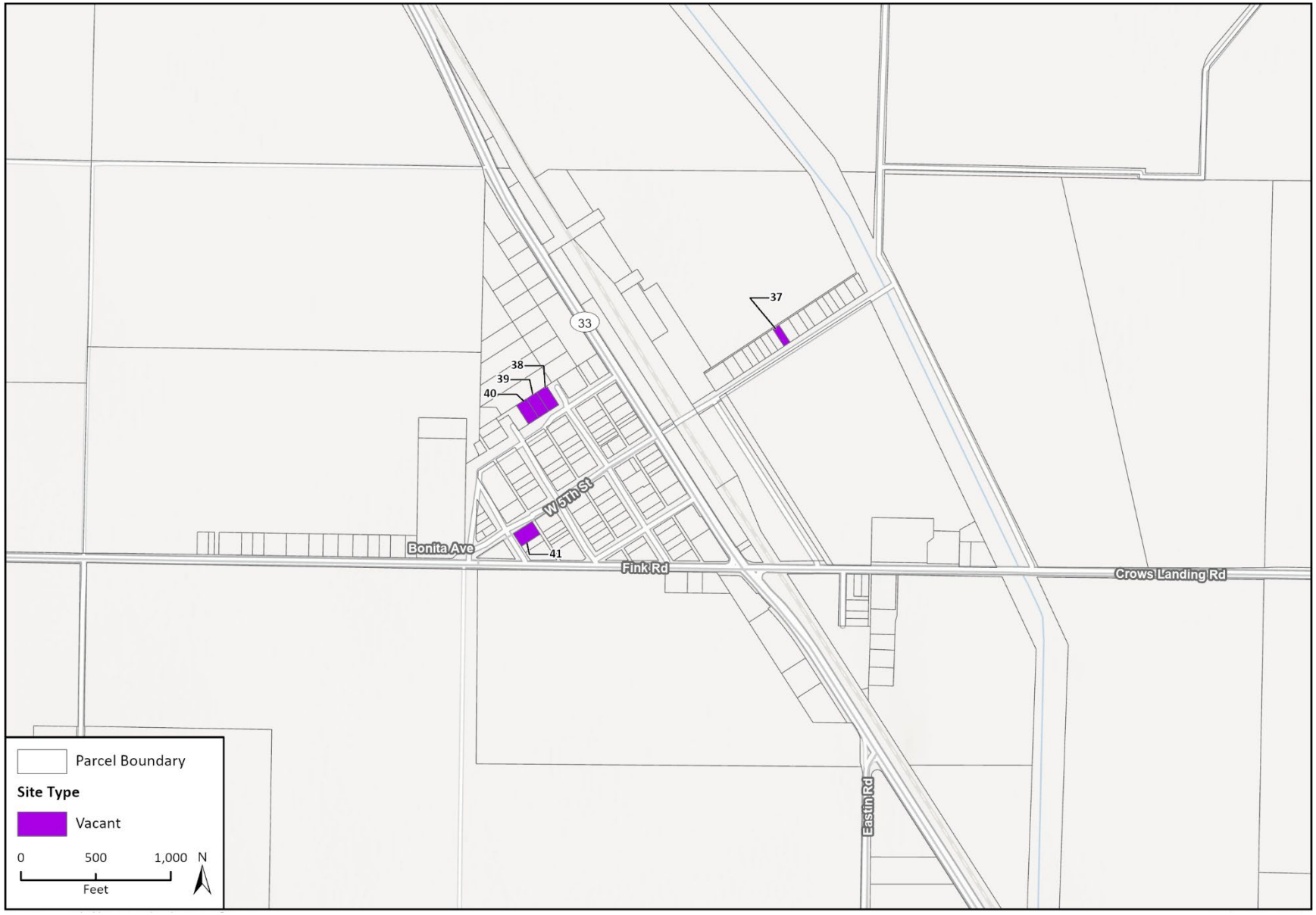


Figure 5 - Sites Identified in Denair

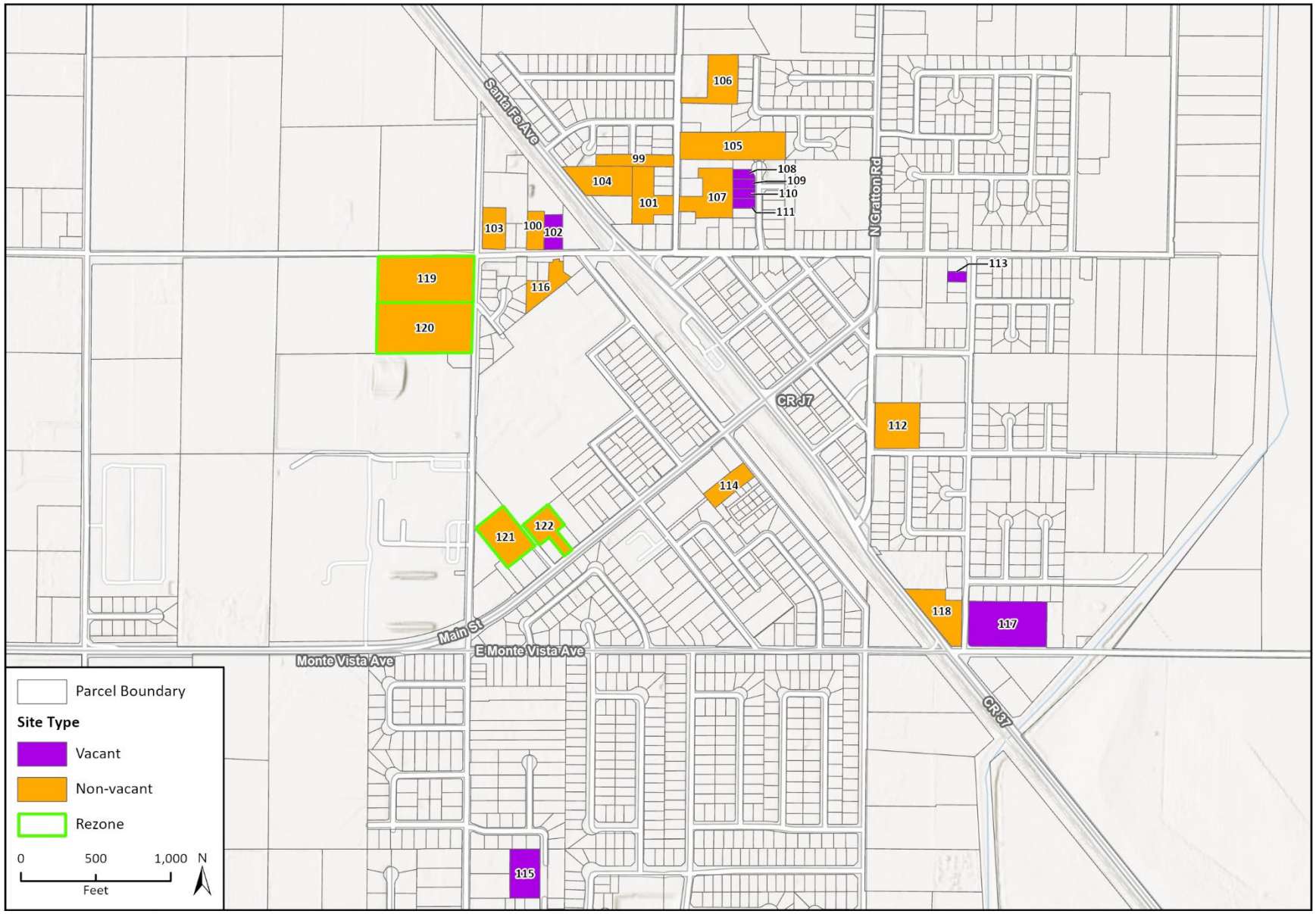


Figure 7 - Sites Identified in Empire

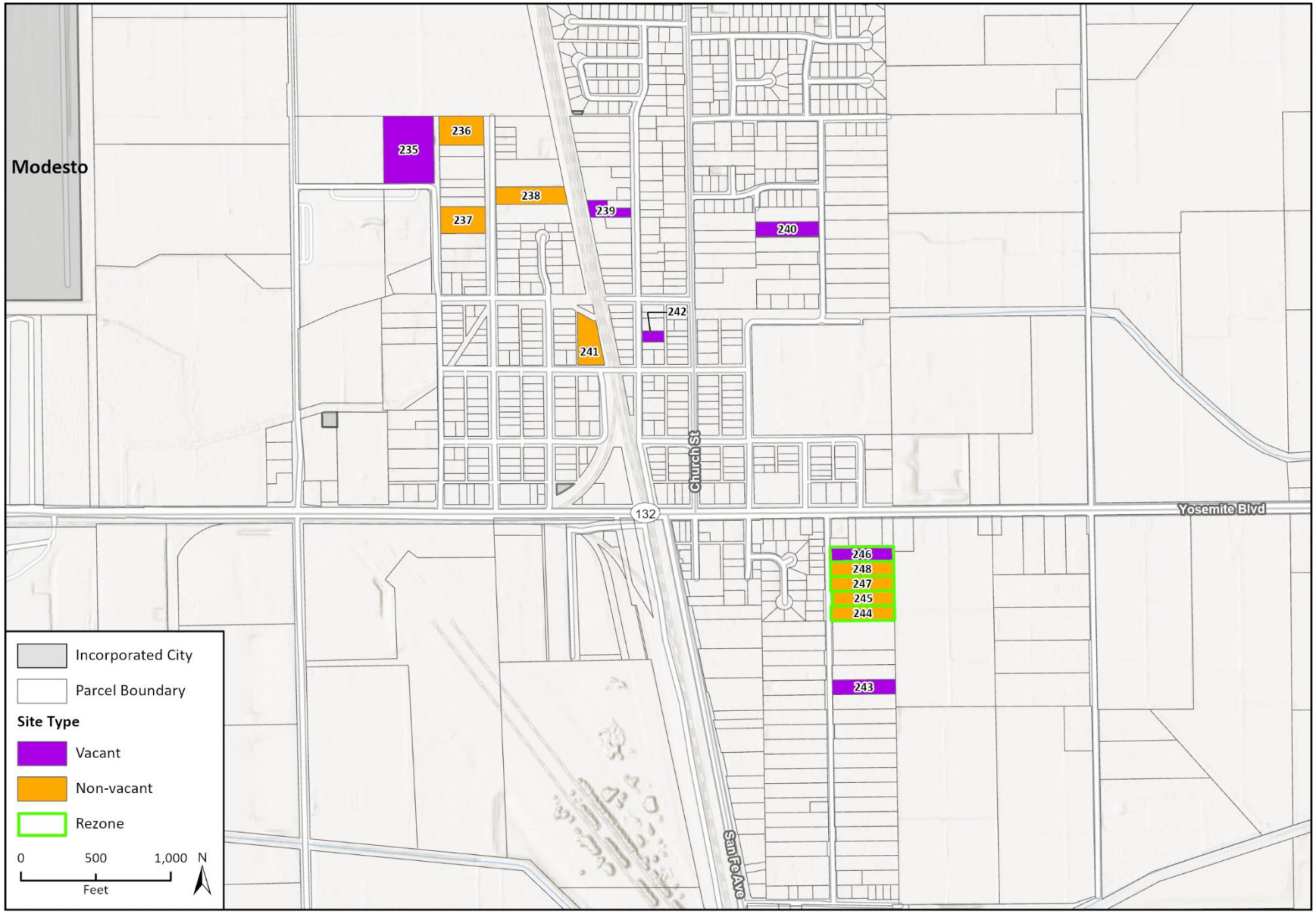


Figure 8 - Sites Identified in Grayson

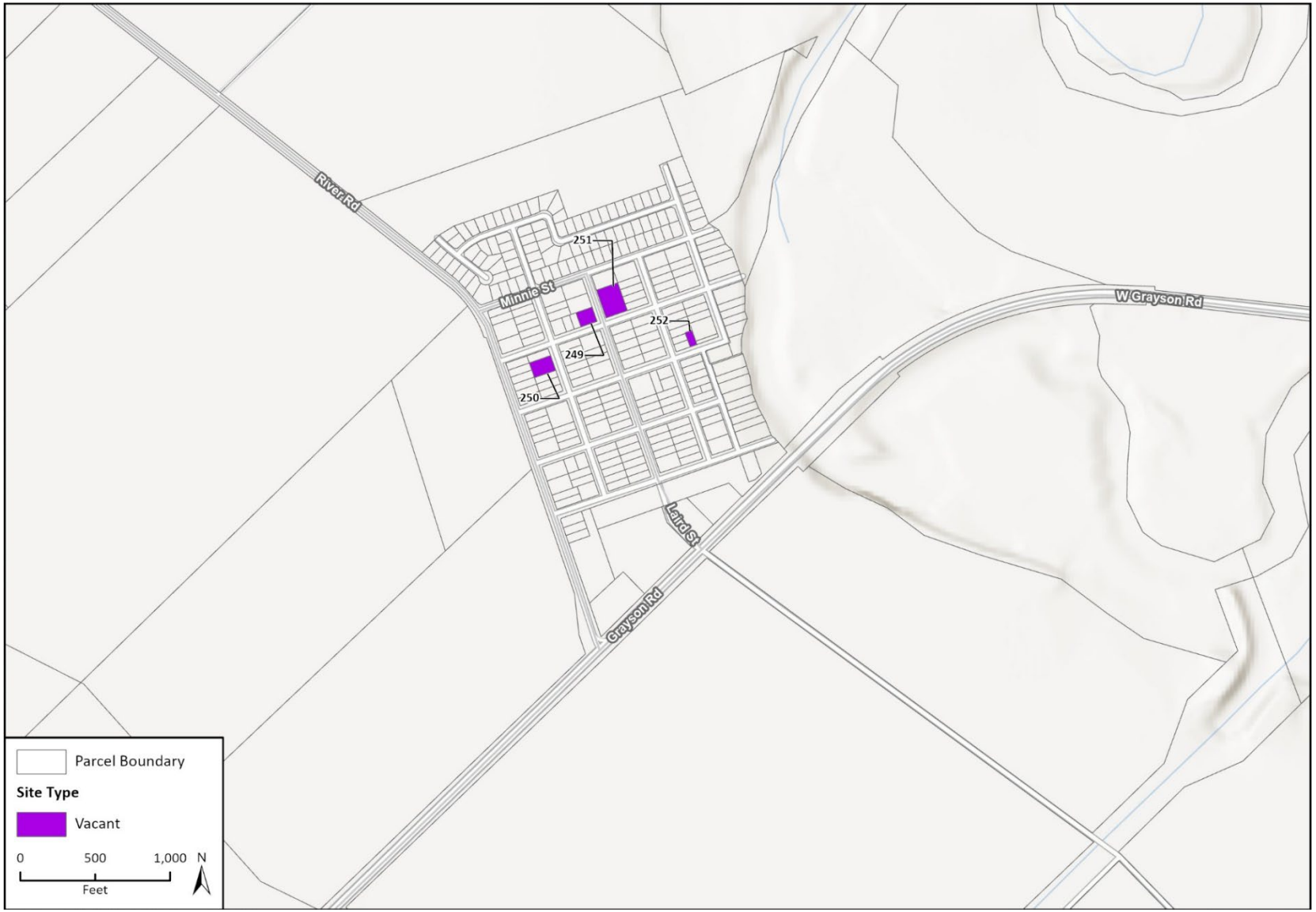


Figure 9 - Sites Identified in Hickman

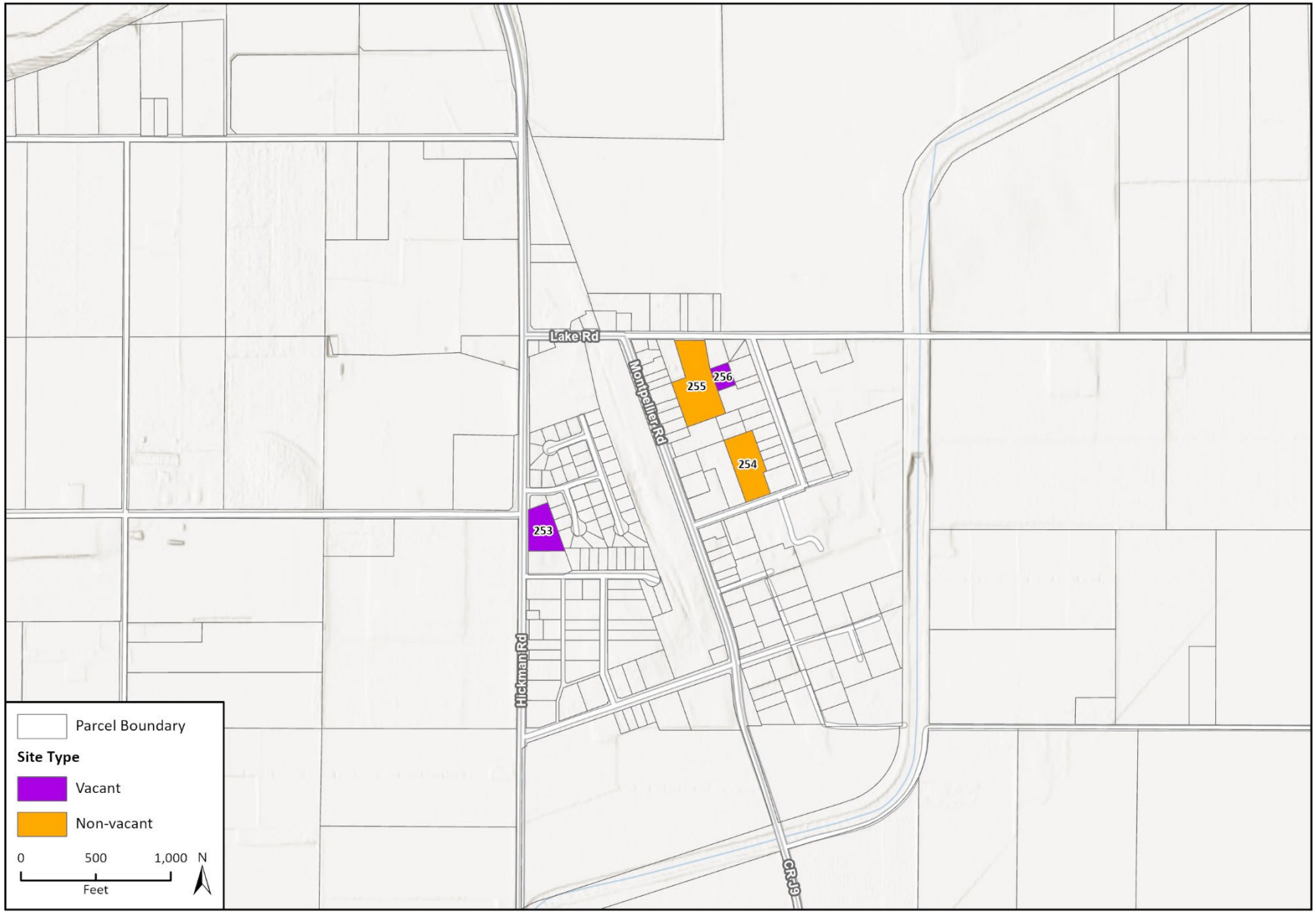


Table 20 - Residential Sites in Keyes

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
257	4021 ANNA AVE	045014004	0.52	Single Family W/Extra Land	R-3	No Change	25	6	No	High Resource	YES - Current
258	4212 ANNA AVE	045014015	0.52	Single Family W/Extra Land	R-3	No Change	25	5	No	Insufficient Data	YES - Current
259	4204 ANNA AVE	045014016	0.53	Single Family W/Extra Land	R-3	No Change	25	5	No	Insufficient Data	YES - Current
260	4205 LUCINDA AVE	045016004	0.15	Vacant	R-1	No Change	8.7	1	No	Insufficient Data	YES - Current
261	5305 9TH ST	045019014	0.14	Vacant	R-1	No Change	8.7	1	No	High Resource	YES - Current
262	4305 LIZZIE AVE	045020001	0.29	Vacant	R-1	No Change	8.7	1	No	Insufficient Data	YES - Current
263	5405 10TH ST	045020046	0.15	Vacant	R-1	No Change	8.7	1	No	High Resource	YES - Current
264	BLACKBERRY WAY	045064073	0.41	Vacant	R-1	No Change	8.7	2	No	High Resource	YES - Current
265	4821 NUNES RD	045065001	0.53	Vacant	R-3	No Change	25	8	No	High Resource	YES - Current
266	0 BRIANNA AVE	045066059	0.70	Vacant	R-1	No Change	8.7	3	No	High Resource	YES - Current
267	5911 WASHINGTON RD	045071002	1.11	Vacant	R-A	No Change	5.4	3	No	High Resource	YES - Current
268	4701 NORMA WAY	045021019	1.00	Single Family W/Extra Land	R-1	R-3	25	14	Yes	High Resource	YES - Current
269	4701 MAUD AVE	045021020	2.00	Single Family W/Extra Land	R-1	R-3	25	35	Yes	High Resource	YES - Current
270	0 9TH ST	045033007	1.45	Vacant	H-1	R-3	25	29	Yes	Insufficient Data	YES - Current

Figure 10 - Sites Identified in Keyes

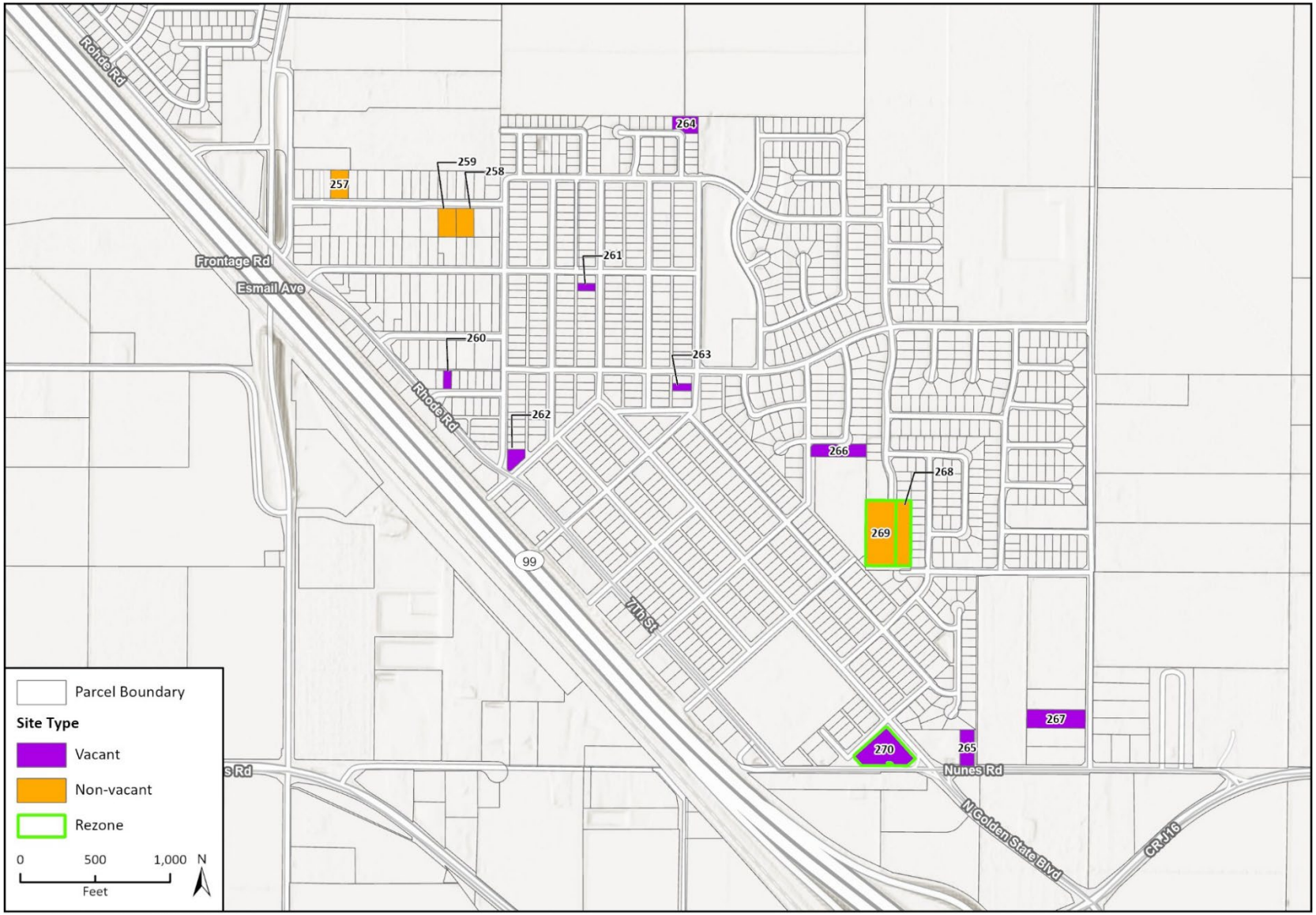


Table 22 - Residential Sites in North Ceres

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
271	456 BYSTRUM RD	038008009	0.62	Single Family W/Extra Land	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
272	805 SOUZA AVE	038011006	0.46	Single Family W/Extra Land	R-3	No Change	25	5	No	High Segregation and Poverty	YES - Current
273	818 SOUZA AVE	038011010	0.29	Vacant	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
274	703 ERICKSON AVE	038011020	0.18	Vacant	R-3	No Change	25	2	No	High Segregation and Poverty	YES - Current
275	901 LOMBARDO AVE	038015018	1.13	Single Family W/Extra Land	R-A	No Change	5.4	3	No	High Segregation and Poverty	YES - Current
276	PERFIDIA AVE	038015022	0.16	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
277	720 LOMBARDO AVE	038015039	0.14	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
278	916 SONORA AVE	038016008	0.92	Single Family W/Extra Land	R-3	No Change	25	10	No	High Segregation and Poverty	YES - Current
279	923 LATIMER AVE	038016009	0.47	Single Family W/Extra Land	R-3	No Change	25	5	No	High Segregation and Poverty	YES - Current
280	915 LATIMER AVE	038016010	0.70	Single Family W/Extra Land	R-3	No Change	25	7	No	High Segregation and Poverty	YES - Current
281	850 SONORA AVE	038016045	0.33	Single Family W/Extra Land	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
282	854 SONORA AVE	038016046	0.39	Single Family W/Extra Land	R-3	No Change	25	4	No	High Segregation and Poverty	YES - Current
283	1102 LEO AVE	038042001	0.49	Vacant	R-1	No Change	8.7	2	No	High Segregation and Poverty	YES - Current
284	PARSONS CT	038051005	0.18	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
285	PARSONS CT	038051007	0.17	Vacant	R-1	No Change	8.7	1	No	High Segregation and Poverty	YES - Current
286	LIVE OAK CT	039005032	2.47	Vacant	R-A	No Change	5.4	5	No	High Resource	YES - Current
287	1414 HOLM AVE	039030033	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
288	1620 HOLM AVE	039031055	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
289	854 PECOS AVE	038039016	1.19	Single Family W/Extra Land	R-A	R-3	25	22	Yes	High Segregation and Poverty	YES - Current
290	838 PECOS AVE	038039031	0.87	Single Family W/Extra Land	R-A	R-3	25	10	Yes	High Segregation and Poverty	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
291	1809 E HATCH RD	039025019	1.51	Single Family W/Extra Land	R-A	R-3	25	22	Yes	Low Resource	YES - Current
292	822 BYSTRUM RD	038017041	4.40	Mobile home Parks	P-D	R-3	25	62	Yes	High Segregation and Poverty	YES - Current

Figure 11 - Sites Identified in North Ceres

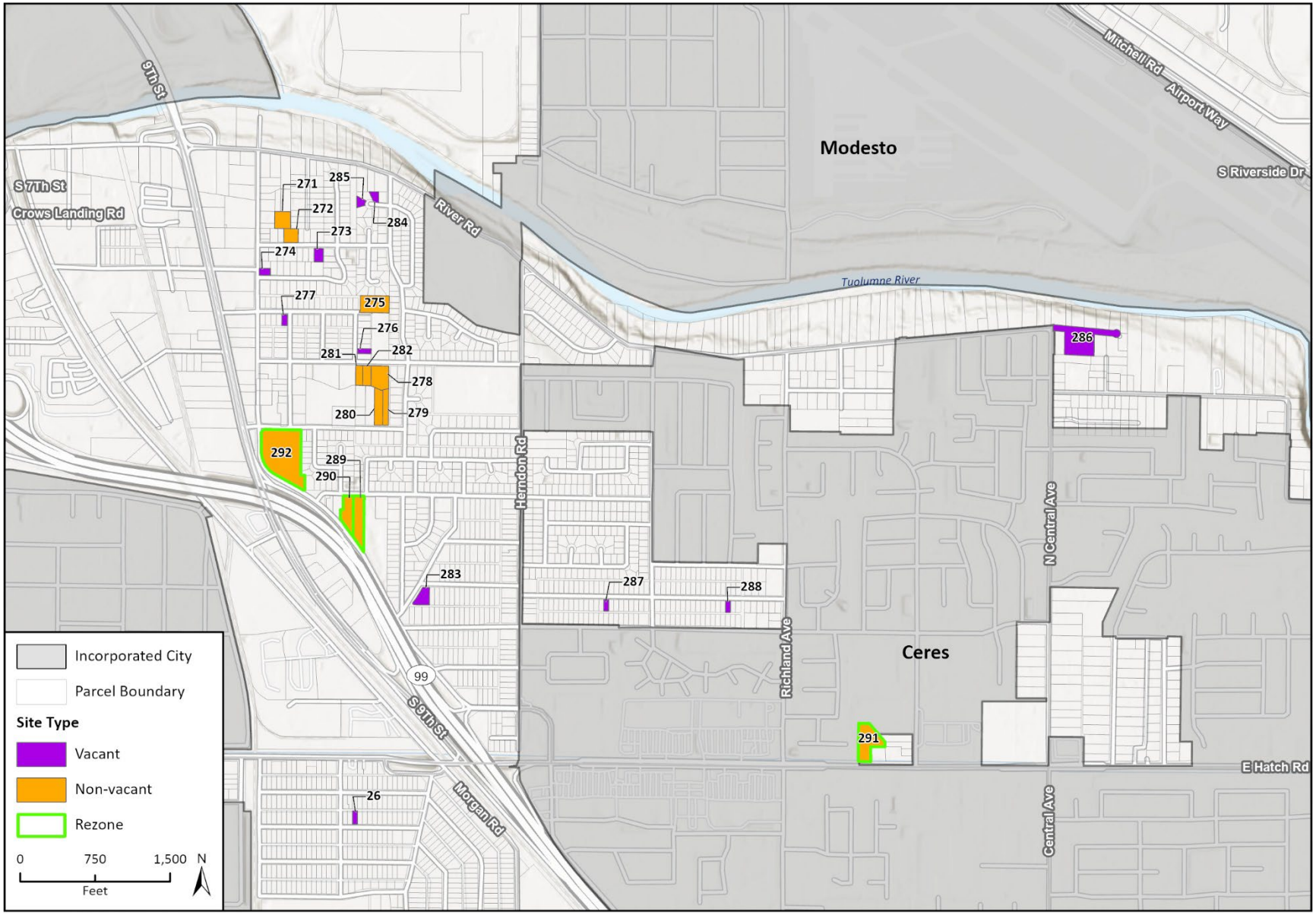
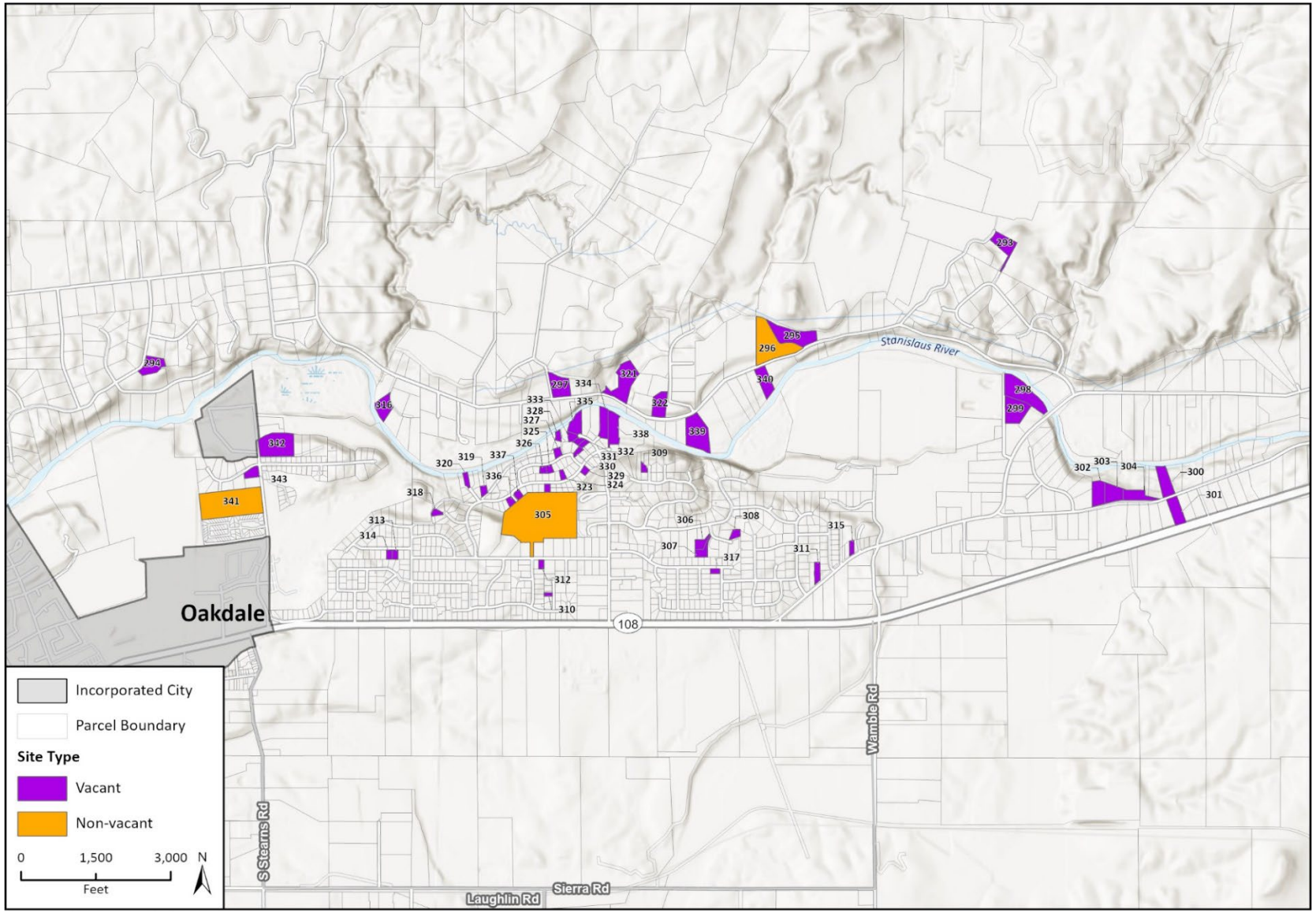


Table 24 - Residential Sites in East Oakdale

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
293	0 SARATOGA HILLS DR	002022038	3.25	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
294	OAK VIEW DR	006081099	3.01	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
295	RODDEN RD	010001078	5.85	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
296	11727 RODDEN RD	010001079	9.71	Single Family W/Extra Land	R-A	No Change	0.33	2	No	Highest Resource	YES - Potential
297	RODDEN RD	010003008	3.67	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
298	0 GRAY RD	010009002	6.80	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
299	0 GRAY RD	010009036	4.68	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
300	LANCASTER RD	010012022	3.15	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
301	13124 LANCASTER RD	010012034	2.85	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
302	0 LANCASTER RD	010012042	2.82	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
303	12919 LANCASTER RD	010012043	2.75	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
304	0 LANCASTER RD	010012044	2.49	Vacant	R-A	No Change	0.33	1	No	High Resource	YES - Potential
305	10661 DIXON RD	010021095	30.05	Single Family W/Extra Land	R-A	No Change	2.2	48	No	Highest Resource	YES - Potential
306	9821 BLACK OAK CT	010025104	1.05	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
307	9817 BLACK OAK CT	010025105	1.20	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
308	0 BLACK OAK CT	010025109	0.74	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
309	RIVER OAK CIR	010030023	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
310	SOMMER PL	010033042	0.28	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
311	11761 ORANGE BLOSSOM RD	010034026	1.06	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
312	DIXON RD	010050001	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
313	BUCKMEADOWS DR	010052003	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
314	BUCKMEADOWS DR	010052004	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
315	ORANGE BLOSSOM RD	010057007	0.61	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
316	0 CIMARRON TRAIL	010065007	2.69	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
317	11320 WILD OAK CT	010068016	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
318	FOX BOROUGH CT	010069009	0.56	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Maximum Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
319	10203 ATLAS RD	010071009	0.57	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
320	10019 RIVER RANCH CT	010071015	0.66	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
321	0 RODDEN RD	010074009	6.11	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
322	0 RODDEN RD	010074016	3.03	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
323	0 FOX BOROUGH DR	010075007	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
324	0 FOX BOROUGH DR	010075018	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
325	0 GOLDSBOROUGH CIR	010075026	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
326	0 GOLDSBOROUGH CIR	010075027	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
327	0 GOLDSBOROUGH CIR	010075040	0.62	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
328	0 GOLDSBOROUGH CIR	010075043	0.51	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
329	0 FOX BOROUGH DR	010076005	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
330	0 GOLDSBOROUGH CIR	010076009	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
331	0 SAVANNAH CT	010076014	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
332	0 SAVANNAH CT	010076015	0.46	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
333	0 SAVANNAH CT	010076016	0.67	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
334	0 NEWBERRY CT	010076022	2.39	Vacant	R-A	No Change	2.2	3	No	Highest Resource	YES - Potential
335	0 SAVANNAH CT	010076028	2.11	Vacant	R-A	No Change	2.2	3	No	Highest Resource	YES - Potential
336	0 HIDDEN HILLS DR	010077009	0.54	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
337	0 HIDDEN HILLS DR	010077011	0.53	Vacant	R-A	No Change	2.2	1	No	Highest Resource	YES - Potential
338	0 DILLWOOD RD	010081005	3.20	Vacant	R-A	No Change	2.2	5	No	Highest Resource	YES - Potential
339	RODDEN RD	010082003	6.52	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
340	RODDEN RD	010083003	3.00	Vacant	R-A	No Change	0.33	1	No	Highest Resource	YES - Potential
341	624 STEARNS	064010010	13.98	Single Family W/Extra Land	R-A	No Change	2.2	44	No	Highest Resource	YES - Potential
342	N STEARNS RD	064014001	7.22	Vacant	R-A	No Change	0.33	11	No	Highest Resource	YES - Potential
343	2321 JACKIE CT	064035014	1.22	Vacant	R-A	No Change	0.33	2	No	Highest Resource	YES - Potential

Figure 12 - Sites Identified in East Oakdale



Salida

Salida is a community located north of Modesto. The community has a variety of zoning, with a substantial portion of planned developments allowing for single-family residential development. Domestic water service is provided by the City of Modesto and sewer service by the Salida Sanitary District. While the Salida Community Plan (SCP) Amendment area allows for the build out of approximately 5,000 dwelling units, the plan for the Amendment area was adopted without the environmental analysis required under the California Environmental Quality Act (CEQA). Because significant additional environmental review is required prior to the implementation and build-out of the SCP Amendment area, the Plan's capacity has not been included in the Sites Inventory and only capacity in the Existing Salida Community Plan area has been included. Table 5-33 summarizes available capacity in Salida outside of the SCP area and Table 5-34 details all residential sites in this area. Figure 5-14 shows sites identified in Salida.

Table 25 - Residential Capacity in Salida

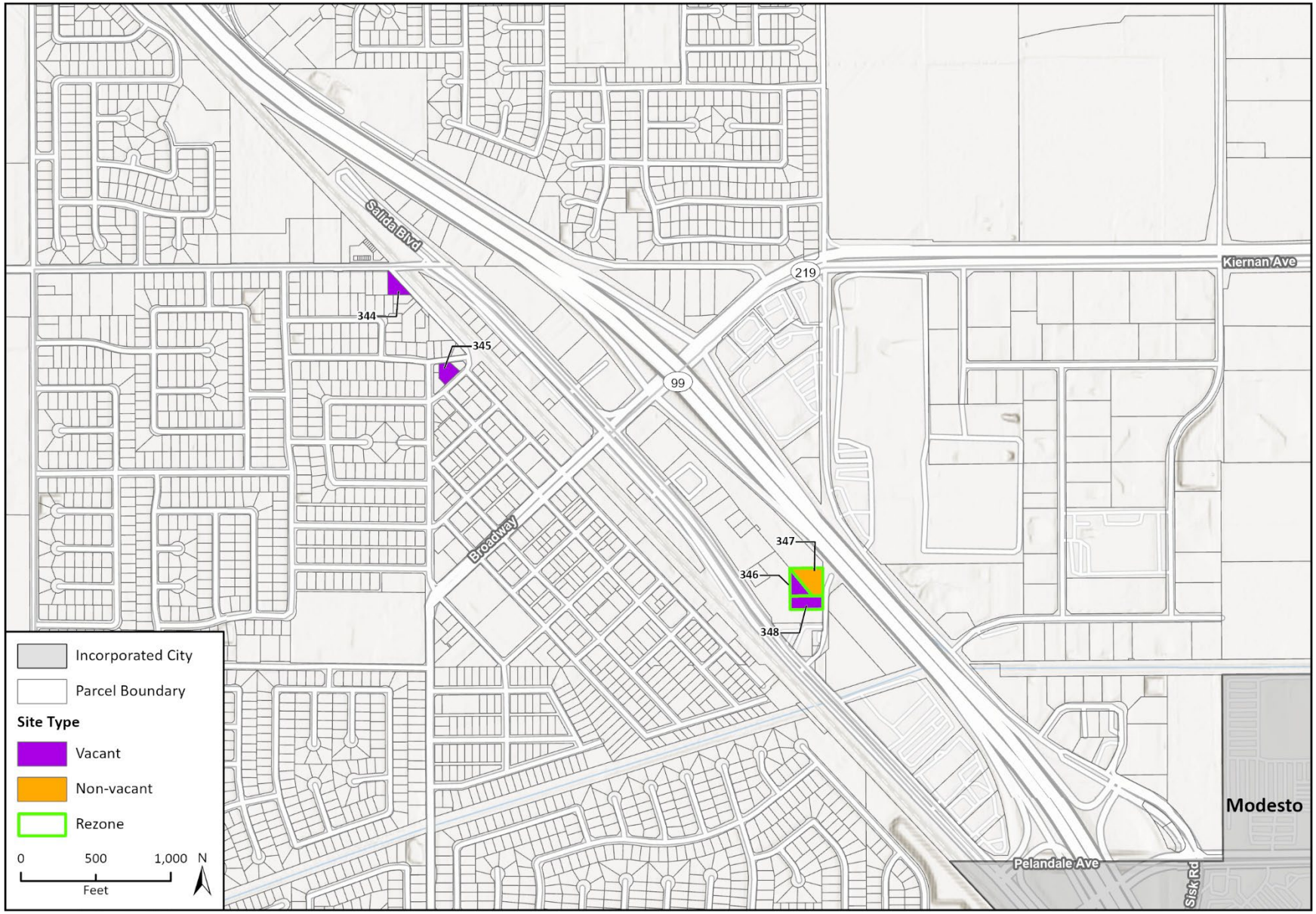
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	2	0.60	0	5	2	7
Rezoned Sites	3	1.4	0	18	3	21
Total	**5**	**2**	**0**	**23**	**5**	**28**

The Sites Inventory identified approximately two acres across five vacant and single-family home sites with significant undeveloped land suitable for subdivision to accommodate an estimated 28 housing units. Of these 28 units, 23 units are assigned to the moderate-income category and five units are assigned to the above moderate-income category. The County did not assume any lower-income units in this community due to small parcel size and infrastructure constraints of the identified sites. TCAC Resource levels in this community range from Low to Moderate.

Table 26 - Residential Sites in Salida

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
344	5367 ELM ST	135004042	0.30	Vacant	R-2	No Change	14	3	No	Low Resource	YES - Current
345	4545 MASON AVE	135046004	0.30	Vacant	R-3	No Change	25	4	No	Low Resource	YES - Current
346	HOPE LN	135041010	0.32	Vacant	C-2	MU	25	6	Yes	Moderate Resource	YES - Current
347	4573 HOPE LN	135041011	0.62	Single Family W/Extra Land	C-2	MU	25	6	Yes	Moderate Resource	YES - Current
348	4549 HOPE LN	135041012	0.46	Vacant	C-2	MU	25	9	Yes	Moderate Resource	YES - Current

Figure 13 - Sites Identified in Salida



South Ceres (Laurel/Central)

South Ceres (Laurel/Central) is an urbanized area adjacent to the southern boundary of the City of Ceres within the City's sphere of influence. The Laurel/Central neighborhood is located east of Central Avenue, west of Highway 99, north of E. Service Road, and south of Industrial Way in an unincorporated pocket on the southside of the City of Ceres. Residential uses surround the neighborhood and industrial development surrounds the neighborhood to the north and east, along Highway 99. The area is mostly residential with several small agricultural properties. The area lacks both domestic water and sewer utilities but has the potential to be served by the City of Ceres for both services. Table 5-35 summarizes available capacity in South Ceres and Table 5-36 details all residential sites in this area.

Table 27 - Residential Capacity in South Ceres (Laurel/Central)

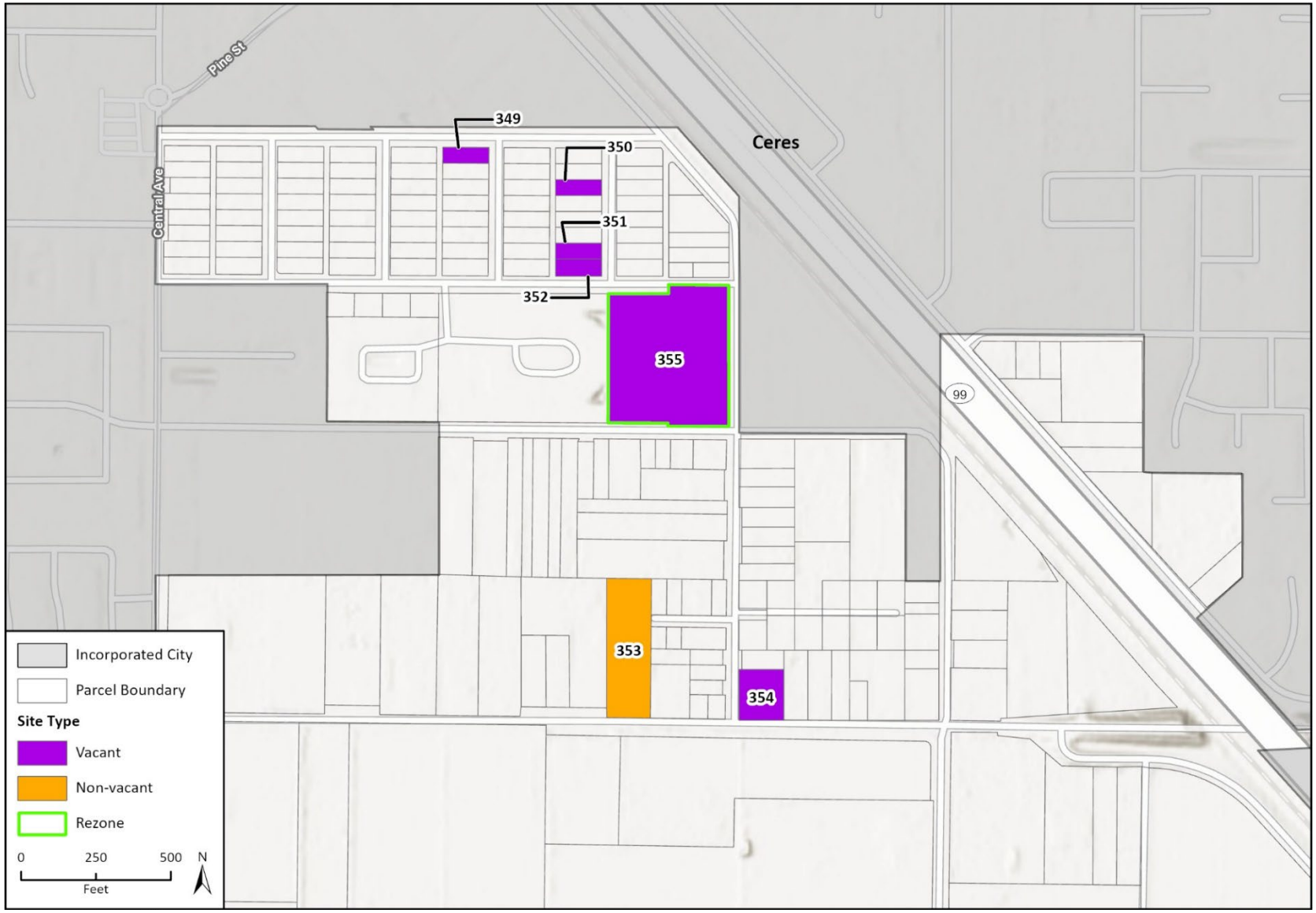
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	6	2.93	0	1	9	10
Rezoned Sites	1	4.18	76	7	0	83
Total	**7**	**7.71**	**76**	**8**	**9**	**93**

The Sites Inventory identified six vacant and underutilized sites with significant undeveloped land suitable for subdivision to accommodate 10 housing units. In addition, one four-acre site in South Ceres will be rezoned to facilitate residential development at 25 dwelling units per acre. The proposed rezoning will facilitate the development of an estimated 83 housing units. Including the proposed rezoning, an estimated 93 housing units are projected on the sites in South Ceres shown in Figure 5-15. Of these 93 units, 76 units are assigned the lower-income category, eight units are assigned to the moderate-income category and nine units are assigned to the above moderate-income category. One larger site was identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

Table 28 - Residential Sites in South Ceres

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
349	3601 HEMLOCK AVE	053030047	0.19	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
350	3611 LARCH AVE	053031004	0.19	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
351	3625 LARCH AVE	053031008	0.19	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
352	3627 LARCH AVE	053031009	0.20	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Current
353	2449 E SERVICE RD	053036006	1.58	Single Family W/Extra Land	R-A	No Change	5.4	4	No	Low Resource	YES - Current
354	3950 COLLINS RD	053037033	0.58	Vacant	R-A	No Change	5.4	1	No	Low Resource	YES - Current
355	3703 COLLINS RD	053031023	4.18	Vacant	P-D	R-3	25	83	Yes	Low Resource	YES - Current

Figure 14 - Sites Identified in South Ceres



Turlock (Kenwood/Star)

The Kenwood/Star area is a County island within the City of Turlock. The Sites Inventory identified three vacant sites zoned for multifamily residential within the area. These sites are suitable to accommodate an estimated 10 housing units. Sewer is currently provided by private septic, with some connections to the City of Turlock, but recent American Rescue Plan Act (ARPA) funding is slated to bring municipal sewer service to the area by 2026. Water utilities are provided by the City of Turlock. Figure 5-16 shows sites identified in Turlock. Table 5-37 summarizes available capacity in Turlock and Table 5-38 details all residential sites in this area.

Table 29 - Residential Capacity in Turlock

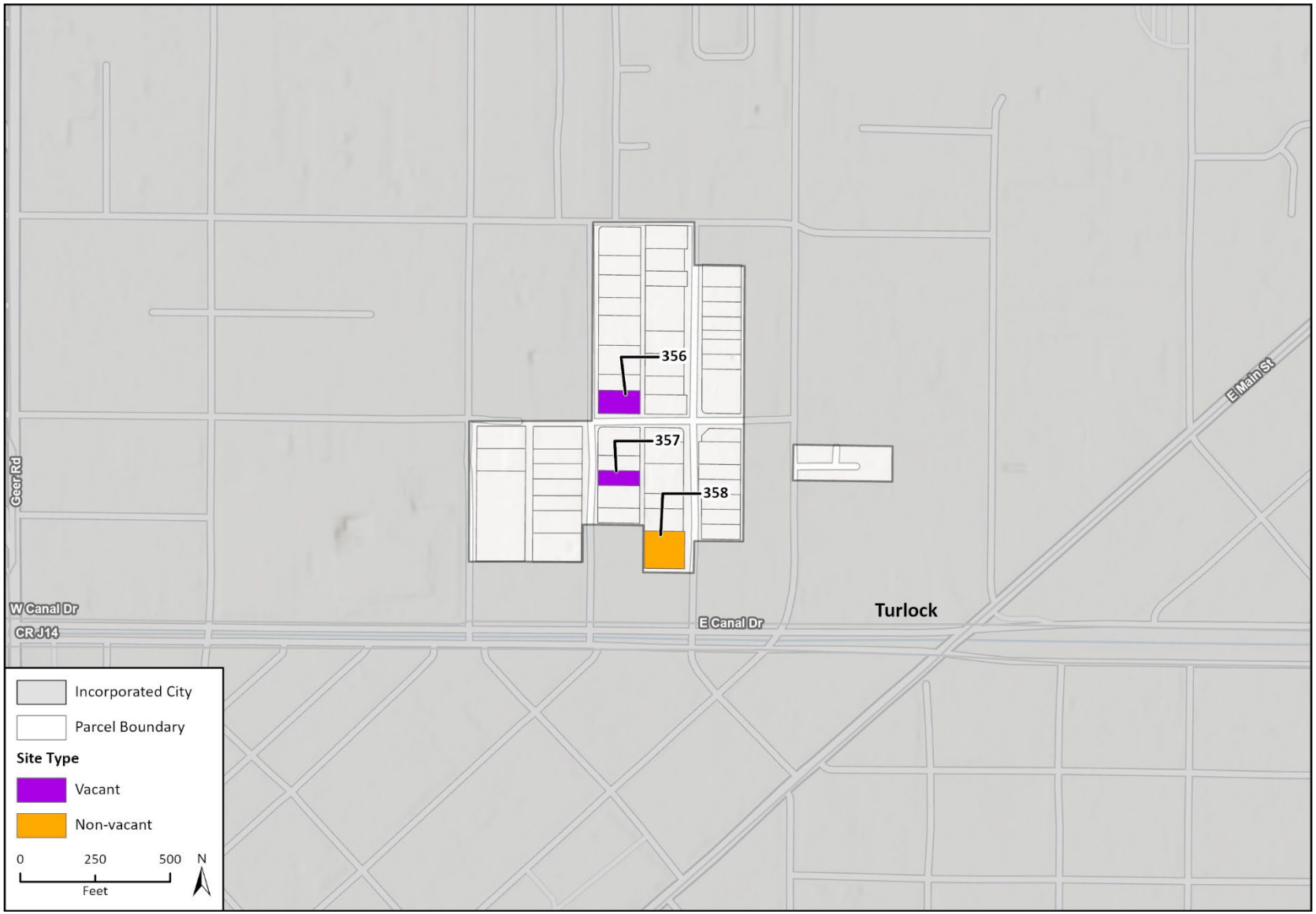
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	3	0.80	0	7	3	10
Rezoned Sites	0	0	0	0	0	0
Total	**3**	**0.80**	**0**	**7**	**3**	**10**

The Sites Inventory identified three vacant and underutilized sites with significant undeveloped land suitable for subdivision to accommodate 10 housing units. Of these 10 units, seven units are assigned to the moderate-income category and three units are assigned to the above moderate-income category. One larger site was identified for rezone in this community to meet the size requirement for lower-income units. The County did not assume any lower-income units in this community due to small parcel size of identified sites. The TCAC Resource categories for the sites in this community are Moderate.

Table 30 - Residential Sites in Turlock (Kenwood/Star)

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
356	1000 MITCHELL AVE	042021005	0.25	Vacant	R-3	No Change	25	4	No	Moderate Resource	YES - Current
357	940 MITCHELL AVE	042024024	0.16	Vacant	R-3	No Change	25	2	No	Moderate Resource	YES - Current
358	859 KENWOOD AVE	042024032	0.39	Single Family W/Extra Land	R-3	No Change	25	4	No	Moderate Resource	YES - Current

Figure 15 - Sites Identified in Turlock (Kenwood/Star)



Valley Home

Valley Home is a small rural community in northeastern Stanislaus County, located north of Oakdale and west of the Woodward Reservoir. Multifamily housing development in Valley Home is not expected due to the lack of public sewer and water services. As a result, no rezoning is proposed in Valley Home. The Sites Inventory identified four rural residential parcels each suitable for the development of one housing unit. Figure 5-17 shows sites identified in Valley Home. Table 5-39 summarizes available capacity in Valley Home and Table 5-40 details all residential sites in this area.

Table 31 - Residential Capacity in Valley Home

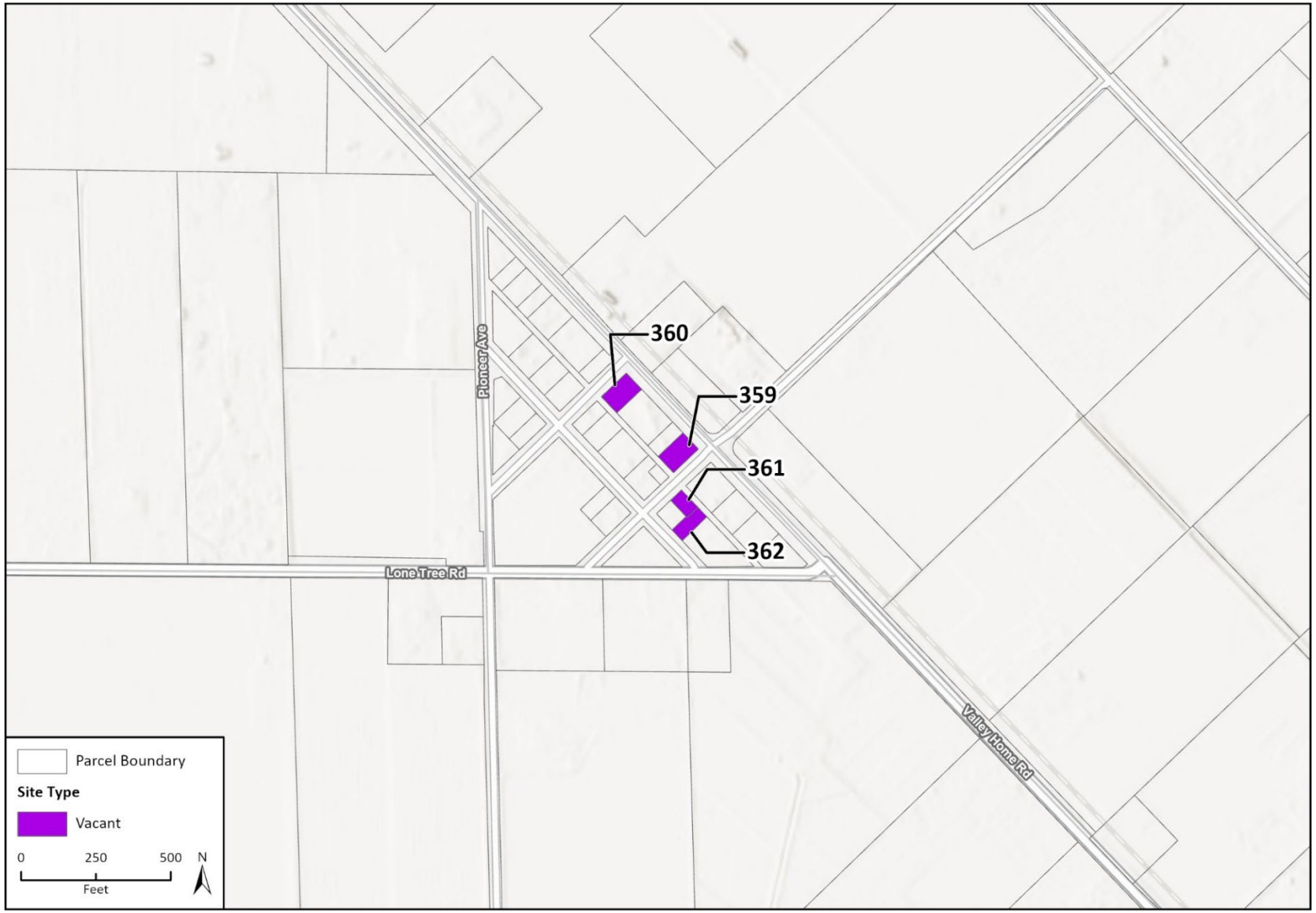
Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	4	0.61	0	0	4	4
Rezoned Sites	0	0.00	0	0	0	0
Total	**4**	**0.61**	**0**	**0**	**4**	**4**

The Sites Inventory identified four vacant to accommodate four housing units. All four units are assigned to the above moderate-income category. No sites are idenfied for rezone in this community. The County did not assume any lower-income units in this community due to low density zoning and smaller parcel size of the identified sites. The TCAC Resource categories for the sites in this community are Highest.

Table 32 - Residential Sites in Valley Home

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
359	VALLEY HOME RD	002006047	0.20	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential
360	13137 VALLEY HOME RD	002006061	0.20	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential
361	4702 MICHIGAN AVE	002006066	0.09	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential
362	13042 MINNESOTA AVE	002006067	0.12	Vacant	R-1	No Change	8.7	1	No	Highest Resource	YES - Potential

Figure 16 - Sites Identified in Valley Home



West Modesto

West Modesto is an urbanized area in the City of Modesto's Sphere of Influence and includes properties zoned for various densities of residential development. The Sites Inventory groups together the Elm/Emerald, Spencer/Marshall, Rouse/Colorado, California/Briggs, Robertson Road, Beverly/Waverly neighborhoods into the "West Modesto" area. The West Modesto area is an unincorporated area located along the southwest edges of the City of Modesto, north of the Tuolumne River, south of Maze Boulevard, and east of Carpenter Road. Figure 5-18 shows the sites identified in West Modesto. The County, in partnership with the City of Modesto, is extending sewer service to the Spencer/Marshall and Rouse/Colorado neighborhoods, which are currently served by septic systems, by the end of 2026. The West Modesto area is also the subject of the City of Modesto's Southwest Modesto Plan which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, infrastructure extending to the unincorporated area. The Plan includes opportunity sites to incorporate higher densities for a variety of housing types. Table 5-41 summarizes available capacity in West Modesto and Table 5-42 details all residential sites in this area.

Table 33 - Residential Capacity in West Modesto

Category	Number of Parcels	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Non-Rezone Sites	50	32.34	0	109	92	201
Rezoned Sites	18	23.44	248	107	15	370
Total	**68**	**55.78**	**248**	**216**	**107**	**571**

The Sites Inventory identified approximately 32 acres of vacant land and underutilized properties suitable for subdivision in West Modesto across 50 properties. These sites can accommodate an estimated 201 housing units. A total of approximately 23 acres of land across 18 parcels will be rezoned to accommodate the development of 370 housing units at densities up to 25 dwelling units per acre. Including the proposed rezoning, an estimated 571 housing units are projected in West Modesto. Of these 571 units, 248 units are assigned to the lower-income category, 216 units are assigned to the moderate-income category, and 107 units are assigned to the above moderate-income category. Larger sites (i.e., between 0.5 and five acres), were identified for rezone in this community to meet the size requirement for lower-income units. The TCAC Resource categories for the sites in this community are Low.

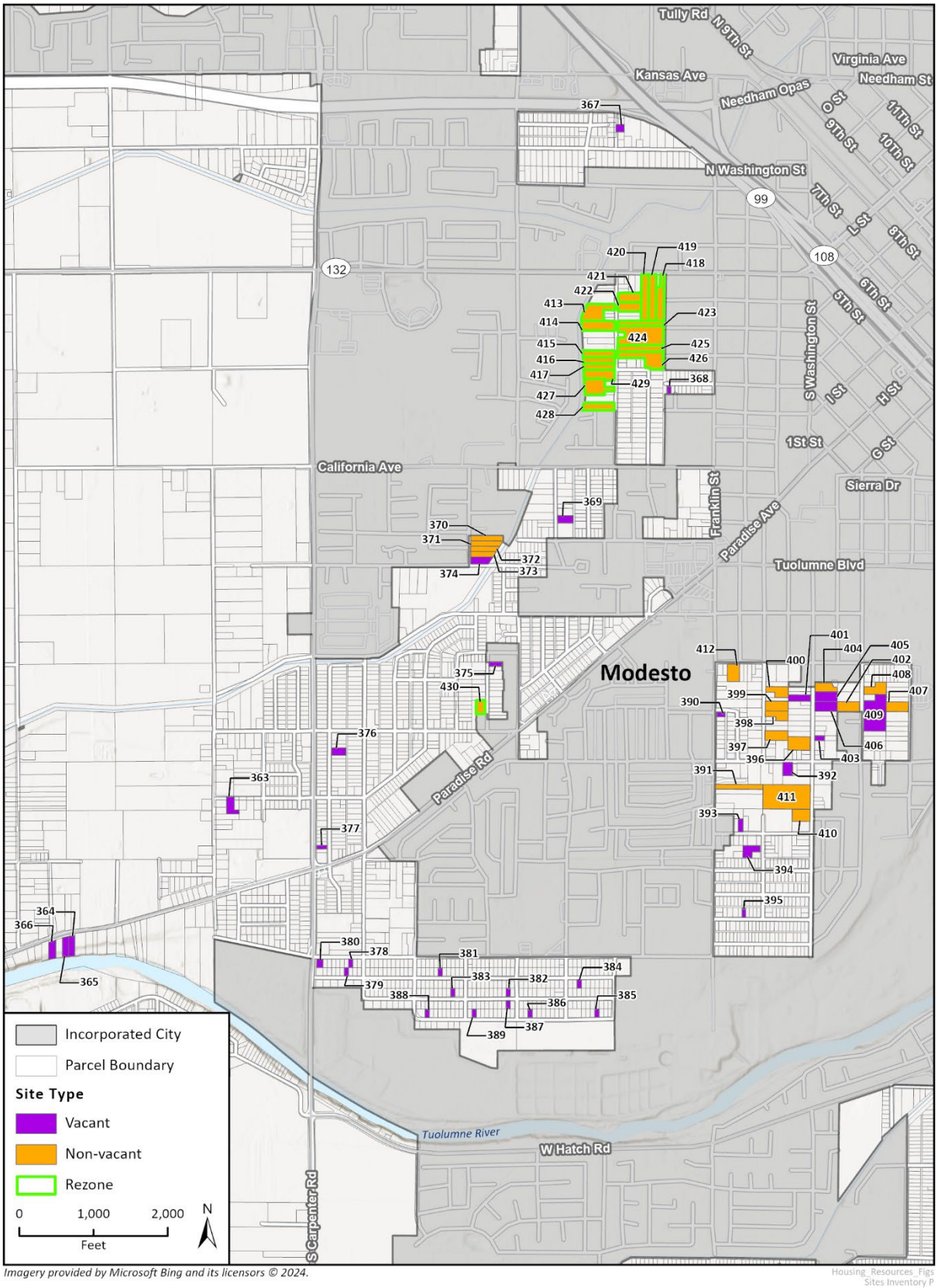
Table 34 - Residential Sites in West Modesto

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
363	WAVERLY DR	017016015	0.63	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
364	0 PARADISE RD	017033015	0.52	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
365	0 PARADISE RD	017033016	0.52	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
366	0 PARADISE RD	017033018	0.52	Vacant	R-A	No Change	2.2	1	No	Low Resource	YES - Current
367	622 ELM WAY	029016003	0.25	Vacant	R-A	No Change	0.33	1	No	Low Resource	YES - Current
368	433 SPRUCE ST	030010013	0.13	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Planned
369	0 SEYBOLD AVE	030014028	0.48	Vacant	R-1	No Change	8.7	2	No	Low Resource	YES - Current
370	924 PANAMA DR	030015027	0.71	Single Family W/Extra Land	R-3	No Change	25	8	No	Low Resource	YES - Current
371	1000 PANAMA DR	030015028	0.69	Single Family W/Extra Land	R-3	No Change	25	7	No	Low Resource	YES - Current
372	1004 PANAMA DR	030015029	0.61	Single Family W/Extra Land	R-3	No Change	25	7	No	Low Resource	YES - Current
373	1008 PANAMA DR	030015030	0.53	Single Family W/Extra Land	R-3	No Change	25	5	No	Low Resource	YES - Current
374	1012 PANAMA DR	030015031	0.60	Vacant	R-3	No Change	25	9	No	Low Resource	YES - Current
375	1312 RITSCH LN	037004060	0.24	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
376	1520 VICTORIA DR	037005025	0.45	Vacant	R-1	No Change	8.7	2	No	Low Resource	YES - Current
377	VICTORIA DR	037010012	0.16	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current
378	ROBERTSON RD	037020009	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
379	KENNETH ST	037020037	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
380	2236 ROBERTSON RD	037020079	0.22	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Current
381	2021 KENNETH ST	037021040	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
382	1905 DONALD ST	037021068	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
383	2009 DONALD ST	037021080	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
384	1728 KENNETH ST	037022050	0.16	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
385	1713 JOHN ST	037024025	0.16	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
386	1827 JOHN ST	037024037	0.16	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
387	1904 DONALD ST	037025021	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
388	2033 JOHN ST	037025040	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
389	0 JOHN ST	037025053	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Current
390	1420 ELSIE ST	037030059	0.16	Vacant	R-1	No Change	8.7	1	No	Low Resource	YES - Current

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
391	719 SUTTER AVE	037031015	0.97	Single Family W/Extra Land	R-2	No Change	14	5	No	Low Resource	YES - Current
392	1202 ROUSE AVE	037031029	0.55	Vacant	R-2	No Change	14	5	No	Low Resource	YES - Planned
393	1323 FIGARO AVE	037032007	0.27	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Planned
394	0 LEON AVE	037032045	0.68	Vacant	R-3	No Change	25	10	No	Low Resource	YES - Planned
395	1317 AVALON AVE	037034039	0.15	Vacant	R-2	No Change	14	1	No	Low Resource	YES - Planned
396	620 COLORADO AVE	037039016	1.26	Single Family W/Extra Land	R-2	No Change	14	9	No	Low Resource	YES - Planned
397	615 LEON AVE	037039027	0.94	Single Family W/Extra Land	R-2	No Change	14	6	No	Low Resource	YES - Planned
398	601 LEON AVE	037039031	0.77	Single Family W/Extra Land	R-2	No Change	14	5	No	Low Resource	YES - Planned
399	527 LEON AVE	037039032	0.94	Single Family W/Extra Land	R-2	No Change	14	6	No	Low Resource	YES - Planned
400	517 LEON AVE	037039035	0.83	Single Family W/Extra Land	R-2	No Change	14	6	No	Low Resource	YES - Planned
401	COLORADO AVE	037039039	0.60	Vacant	R-2	No Change	14	6	No	Low Resource	YES - Planned
402	528 ROSELAWN AVE	037040012	0.91	Single Family W/Extra Land	R-2	No Change	14	7	No	Low Resource	YES - Planned
403	COLORADO AVE	037040021	0.20	Vacant	R-2	No Change	14	2	No	Low Resource	YES - Planned
404	507 COLORADO AVE	037040028	0.74	Single Family W/Extra Land	R-2	No Change	14	5	No	Low Resource	YES - Planned
405	0 COLORADO AVE	037040056	0.91	Vacant	R-2	No Change	14	9	No	Low Resource	YES - Planned
406	525 COLORADO AVE	037040057	0.91	Vacant	R-2	No Change	14	9	No	Low Resource	YES - Planned
407	532 SUNSET AVE	037041014	0.91	Single Family W/Extra Land	R-1	No Change	8.7	3	No	Low Resource	YES - Planned
408	519 ROSELAWN AVE	037041035	0.92	Single Family W/Extra Land	R-1	No Change	8.7	3	No	Low Resource	YES - Planned
409	ROSELAWN AVE	037041036	3.12	Vacant	R-1	No Change	8.7	17	No	Low Resource	YES - Planned
410	812 COLORADO AVE	037032011	0.92	Single Family W/Extra Land	R-A	No Change	5.4	3	No	Low Resource	YES - Planned
411	718 COLORADO AVE	037031011	4.85	Single Family W/Extra Land	R-A	No Change	5.4	16	No	Low Resource	YES - Planned
412	1406 SOUTH AVE	037030002	0.89	Single Family W/Extra Land	R-1	No Change	8.7	4	No	Low Resource	YES - Planned
413	207 SPENCER AVE	030004005	1.66	Single Family W/Extra Land	R-A	R-3	25	28	Yes	Low Resource	YES - Planned
414	227 SPENCER AVE	030004009	1.35	Single Family W/Extra Land	R-A	R-3	25	18	Yes	Low Resource	YES - Planned
415	323 SPENCER AVE	030004013	0.87	Single Family W/Extra Land	R-A	R-3	25	13	Yes	Low Resource	YES - Planned
416	333 SPENCER AVE	030004014	0.84	Single Family W/Extra Land	R-A	R-3	25	12	Yes	Low Resource	YES - Planned
417	337 SPENCER AVE	030004015	0.82	Single Family W/Extra Land	R-A	R-3	25	12	Yes	Low Resource	YES - Planned
418	523 MAZE BLVD	030005001	1.31	Single Family W/Extra Land	R-1	R-3	25	22	Yes	Low Resource	YES - Planned
419	531 MAZE BLVD	030005003	1.45	Single Family W/Extra Land	R-1	R-3	25	22	Yes	Low Resource	YES - Planned

Site #	Site Address or Street	APN	Acres	Current Use	Current Zone	Proposed Zone	Max Density	Total Units	Rezone Site	TCAC Opportunity Category	Infrastructure Availability
420	539 MAZE BLVD	030005004	1.44	Single Family W/Extra Land	R-1	R-3	25	22	Yes	Low Resource	YES - Planned
421	128 SPENCER AVE	030005011	0.90	Single Family W/Extra Land	R-1	R-3	25	13	Yes	Low Resource	YES - Planned
422	204 SPENCER AVE	030005012	0.88	Single Family W/Extra Land	R-1	R-3	25	12	Yes	Low Resource	YES - Planned
423	226 SPENCER AVE	030005015	0.94	Single Family W/Extra Land	R-1	R-3	25	15	Yes	Low Resource	YES - Planned
424	310 SPENCER AVE	030005016	3.54	Single Family W/Extra Land	R-1	R-3	25	66	Yes	Low Resource	YES - Planned
425	320 SPENCER AVE	030005018	1.24	Single Family W/Extra Land	R-1	R-3	25	20	Yes	Low Resource	YES - Planned
426	533 TRUMAN AVE	030005026	2.01	Single Family W/Extra Land	R-1	R-3	25	30	Yes	Low Resource	YES - Planned
427	415 SPENCER AVE	030008003	1.51	Single Family W/Extra Land	R-A	R-3	25	27	Yes	Low Resource	YES - Planned
428	511 SPENCER AVE	030008006	0.98	Single Family W/Extra Land	R-A	R-3	25	12	Yes	Low Resource	YES - Planned
429	405 SPENCER AVE	030008016	1.20	Single Family W/Extra Land	R-A	R-3	25	20	Yes	Low Resource	YES - Planned
430	1427 RITSCH LN	037004061	0.50	Single Family W/Extra Land	R-1	R-3	25	6	Yes	Low Resource	YES - Planned

Figure 17 - Sites Identified in West Modesto



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Housing_Resources_Figs
Sites Inventory P

Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix

Action	Included in Implementation Project	Required to Meet State Law	Environmental Justice	Special Popns	DUC	R/ECAP	RCAA	Housing Stanislaus	Stanislaus 2030
Program 1-1 Home Rehabilitation Program									
1-1a			X	X					
1-1b			X			X	X		
1-1c						X			
1-1d			X		X				
1-1e				X		X			
1-1f			X			X			
1-1g									
Program 1-2 Residential Compliance Program									
1-2a		X	X						
Program 1-3 Building and Design Standards for Energy Efficiency									
1-3a									
1-3b						X			
Program 1-4 Preservation of At-Risk Housing									
1-4a		X							
1-4b		X							
1-4c		X							
1-4d									
1-4e		X							
1-4f									
Program 2-1 Affordable Housing Development Assistance									
2-1a				X		X			
2-1b				X		X			
2-1c				X		X			
2-1d									
2-1e									
2-1f									
2-1g									
2-1h				X					

EXHIBIT E

Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix

2-1i				X		X			
Program 2-2 Density Bonus									
2-2a	X	X							
2-2b									
2-2c									
2-2d									
2-2e									
Program 2-3 Housing Choice Vouchers									
2-3a									
2-3b									
2-3c							X		
2-3d				X					
Program 2-4 Support Homeownership Opportunities									
2-4a						X			
2-4b						X			
Program 2-5 Housing Trust Fund									
2-5a								X	
Program 2-6 Regional Collaboration to Facilitate Housing throughout Stanislaus County									
2-6a								X	
2-6b								X	
2-6c									X
2-6d								X	
2-6e				X					
2-6f				X					
Program 3-1 Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth									
3-1a								X	
3-1b								X	
3-1c		X							
3-1d								X	
3-1e	X								
3-1f								X	
3-1g	X	X							

Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix

3-1h	X							X	
3-1i	X							X	
3-1j							X	X	
Program 3-2 No Net Loss Zoning									
3-2a		X							
3-2b									
3-2c		X							
3-2d									
3-2e									
Program 3-3 Replacement Housing									
3-3a	X	X							
Program 3-4 Provide Adequate Sites for Lower-Income Households on Nonvacant and Vacant Sites Previously Identified									
3-4a	X	X							
Program 3-5 Adaptive Reuse									
3-5a	X								
Program 3-6 Zoning for a Variety of Housing Types									
3-6a								X	
3-6b	X							X	
3-6c	X	X							
3-6d	X	X							
3-6e	X								
3-6f	X	X							
3-6g	X	X							
3-6h								X	
3-6i	X	X							
3-6j	X	X							
3-6k								X	
3-6l									
Program 3-7 Expidited Project Review									
3-7a								X	
3-7b		X							

Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix

3-7c		X							
3-7d								X	
3-7e								X	
3-7f	X	X							
3-7g		X							
3-7h		X							
Program 3-8 Accessory Dwelling Units									
3-8a								X	
3-8b								X	
3-8c								X	
3-8d							X	X	
3-8e									
3-8f									
3-8g								X	
Program 3-9 Infrastructure									
3-9a									
3-9b									
3-9c						X			
3-9d								X	
3-9e		X							
3-9f									
3-9g									
3-9h		X							
3-9i						X			
Program 4-1 Housing for Special Needs Populations									
4-1a				X					
4-1b				X					
4-1c				X					
4-1d				X				X	
4-1e	X			X					
Program 4-2 Farmworker Housing									
4-2a				X					

Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix

4-2b				X				X	
4-2c	X	X		X					
4-2d				X					
4-2e		X		X					
4-2f				X					
4-2g				X					
Program 4-3 Homelessness									
4-3a				X					
4-3b				X					
4-3c				X					
4-3d				X					
4-3e	X	X		X					
4-3f				X					
Program 4-4 Community Outreach and Education									
4-4a			X						
4-4b				X					
4-4c			X						
4-4d			X					X	
Program 5-1 Affirmatively Furthering Fair Housing and Environmental Justice									
5-1a									
5-1b									
5-1c						X			X
5-1d						X		X	
5-1e									
5-1f									
5-1g			X						
5-1h		X							
5-1i						X			
5-1j			X			X			
5-1k									
5-1l									
Program 5-2 Fair Housing Services									

Stanislaus County Sixth Cycle Housing Plan - Programs and Actions Matrix

5-2a			X		X				
5-2b									
5-2c									
5-2d									
5-2e									
Program 5-3 Displacement Prevention, Place-Based Strategies, and Housing mobility									
5-3a		X							
5-3b									
5-3c									
5-3d			X		X				
5-3e			X						
5-3f									
5-3g						X			X
5-3h						X			
5-3i									

Table of Contents

6 Housing Plan 6-1
6.1 Summary of Quantified Objectives 6-35

Tables

Table 6-1 Quantified Housing Objectives (2023-2031) 6-35

EXHIBIT F

6 Housing Plan

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

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

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

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

Policies

1A **Support Safe and Livable Housing.** The County shall support code enforcement efforts in responding to complaints and ensuring that existing housing meets adopted code requirements that set forth acceptable health and safety standards for residential units, as the County is required to enforce existing housing and building codes.

1B **Support the Preservation of Existing Single-Family Housing Occupied by Lower-income Households.** The County shall preserve the existing single-family housing stock occupied by lower-income households by providing rehabilitation assistance for single-family, owner-occupied units, including manufactured homes and mobile homes.

1C **Provide Residential Rehabilitation Opportunities.** The County will partner with public and private agencies to provide funding support for residential rehabilitation programs to improve housing quality and conditions, ensuring the safety, habitability, and enhanced living standards for lower-income households.

1D **Preserve At-Risk Units and Naturally Occurring Affordable Housing.** The County will seek to avoid the loss of publicly assisted affordable housing units and/or housing units occupied by lower-income households and the resulting displacement of low-income residents by providing funds, as available, to nonprofit developers to be used for the acquisition of subsidized housing developments at risk of converting to market rate units.

1E **Code Compliance.** The County shall continue to encourage the rehabilitation of substandard residential properties by homeowners and landlords by responding to citizen complaints regarding potential code violations and referring residents to appropriate resources, as the County is required to enforce existing housing and building codes.

Programs

Program 1-1 Home Rehabilitation Program

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

Actions	Objective and Timeframe
Action 1-1a: Provide housing rehabilitation assistance for owner-occupied households, including mobile homes, with a focus on vulnerable and lower-income households including seniors on fixed incomes and persons with disabilities. (Environmental Justice)	Provide grants and/or loans for home repairs of at least four owner-occupied housing units per year for a total of 32 lower-income housing units during the planning period. On an annual basis, focus marketing efforts and funding/resources in neighborhoods with higher concentrations of units in need of rehabilitation (i.e., Airport, Empire, North Ceres, South Ceres, Turlock, areas of West Modesto, Crows Landing, Denair, Grayson, Hickman, Salida, and Valley Home).
Action 1-1b: Provide property owners of substandard or deteriorating housing with rehabilitation program resources to assist with repairs and rehabilitation particularly in Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) and Racially Concentrated Areas of Affluence (RCAAs). (Environmental Justice)	Make program materials (e.g., fact sheets, brochures) available on a case-by-case basis upon property owner inquiry or at the time of code enforcement action.
Action 1-1c: Continue using rehabilitation funds for the testing and mitigation of housing units for lead-based paint pursuant to the Lead-Based Paint Hazard Reduction Act of 1992.	Continue to offer lead-based paint removal as part of the rehabilitation program. Develop marketing materials by December 2025. Focus marketing efforts in older neighborhoods where older homes more likely to contain lead are located (i.e., Rouse/Colorado, Bret Harte, and Airport).
Action 1-1d: Partner with the Stanislaus County Health Services Agency to develop and disseminate educational materials and programs focused on lead risk in housing to children, especially in Disadvantaged Communities. (Environmental Justice)	Develop materials to be disseminated together with rehabilitation program materials and to service providers by December 2025.
Action 1-1e: Work with local nonprofit organizations and community groups to expand and spread awareness on home and accessibility rehabilitation programs.	Provide program materials (e.g., fact sheets, brochures) to nonprofit organizations and community groups by June 2026 and on an ongoing basis, and attend at least one public event per year to publicize rehabilitation programs. Develop marketing materials by October 2026. Focus marketing efforts in neighborhoods with higher concentrations of senior residents (i.e., Rouse/Colorado, Bret Harte, and Airport).
Action 1-1f: Modify the housing rehabilitation program polices, as allowed by funding program guidelines, to assist lower-income homeowners in acquiring the necessary upgrades required to protect against indoor air pollution and poor drinking water quality associated with pesticide pollution. (Environmental Justice)	Modify the housing rehabilitation program policies to use funds, as allowed by funding program guidelines, for air and water filtration by December 2025, with a goal of improving filtration in 25 percent of the units rehabilitated. Focus marketing on neighborhoods with higher pollution burden (i.e., Rouse/Colorado, Bret Harte, and Airport).
Action 1-1g: Explore use of available state and federal funds for code enforcement efforts for rental housing rehabilitation to ensure all rental units meet health and safety standards.	Prioritize inspections and enforcement in areas with high concentrations of rental housing complaints and known substandard conditions, with the goal of inspecting at least 25 rental units annually.
Implements the Following Policies	1B, 1C, 1D
Responsible Agency	County Planning & Community Development County Health Services Agency
Funding Sources	Federal and State Funding

Program 1-2 Residential Compliance Program

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

Actions	Objective and Timeframe
Action 1-2a: Evaluate the County Code for compliance with Section 17970.5 of the California Health and Safety Code and, if necessary, amend the County Code to require that upon a rental tenant complaint, a) a mandatory inspection be conducted and b) specific actions identified that can be taken to mitigate any hazards present. Develop internal policies aligned with Health and Safety Code Sections 17920.10 and 17920.3 to ensure inspections are conducted with the same urgency as final building inspections under Section 110 of the California Building Code. (Environmental Justice)	If determined necessary, amend the County Code and develop internal policies by December 2025. The goal shall be to inspect and specify actions to be taken within 30 days of the complaint being received.
Implements the Following Policies	1A, 1E
Responsible Agency	County Planning & Community Development County Department of Environmental Resources
Funding Sources	Department Revenues

Program 1-3 Building and Design Standards for Energy Efficiency

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

Actions	Objective and Timeframe
Action 1-3a: Emphasize the incorporation of active and passive energy conservation features such as energy-efficient appliances; heating/cooling systems; windows, doors, and skylights; building materials; building/window orientation; and use of landscape materials in new and rehabilitated County-assisted affordable housing.	Amend funding policies to require the use of energy-efficient features, subject to funding guidelines, into all assisted dwelling units by June 2026. For rehabilitated units, application shall be subject to features being replaced or upgraded. Aim to assist two rehabilitation projects per year.
Action 1-3b: Partner with other agencies and energy providers who disperse information and/or offer programs and incentives to increase public awareness and utilization of energy conservation practices.	Identify partners and establish partnership opportunities to disperse information by December 2025. Coordinate with established partners annually to disperse information to homeowners, with specific outreach efforts in Low Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport). Reach at least 5,000 households throughout the planning period, and through publicly available information or estimates given by service providers, track the number of households that take advantage of programs or incentives offered.
Implements the Following Policies	1A
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 1-4 Preservation of At-Risk Affordable Housing

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

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

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

Policies

2A **Homeownership Housing:** The County shall encourage the development of ownership housing and assist tenants to become homeowners to increase owner-occupancy rate within the parameters of federal and state housing laws.

2B **Provide Incentives for Affordable Housing:** The County shall promote the use of density bonuses and waive or reduce park, transportation, and other impact fees to facilitate the development of new housing for extremely low-, very low-, and low-income households.

2C **Integration of Affordable Housing:** The County shall encourage a mix of affordability levels in residential projects and encourage the dispersal of such units to achieve greater integration of affordable housing throughout the community.

2D **Create Access to Capital:** The County shall support efforts to create access to capital needed to increase housing development and improve housing affordability in Stanislaus County. The County shall identify new funding sources and strategies to support affordable housing.

2E **Regional Housing Needs Allocation (RHNA):** The County will support future Stanislaus County Council of Governments (StanCOG) RHNA efforts that equitably recognize the County's contribution to housing developments within city limits through the reduction in County Impact Fees for affordable housing development and for partnerships to develop affordable housing using County funds within the incorporated cities.

2F **RHNA Transfer:** The County shall seek to negotiate agreements with any city proposing to annex land utilized by the County to meet its RHNA obligations to transfer a share of the StanCOG RHNA from the unincorporated area to the annexing city.

Programs

Program 2-1 Affordable Housing Development Assistance

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

Actions	Objective and Timeframe
Action 2-1a: Actively promote sites to qualified housing developers for affordable housing development opportunities through Requests for Proposals (RFPs) with emphasis on promoting housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, multi-generational households, low-income, and/or persons with disabilities.	By December 2025, release an RFP and by the end of the planning period release four RFPs for available sites for affordable housing and provide information on housing incentives and programs to support the entitlement of at least 250 housing units affordable to extremely low-, very low-, and low-income households in the County during the planning period. Focus efforts in neighborhoods with higher concentrations of special needs populations (i.e., Rouse/Colorado, Bret Harte, and Airport), with at least 75-125 affordable units targeted in High Resource and/or above moderate-income areas.
Action 2-1b: Monitor availability of state and federal funding and support developers with their applications for incentives and funding programs that provide financial assistance to develop affordable housing for	Annually, review proposed development budgets and schedules for at least one County-funded affordable housing project (consistent with Action 2-1a) to identify the need for County support with funding applications.

Actions	Objective and Timeframe
special needs populations.	Upon request, provide technical assistance for non-County-funded affordable housing development projects.
Action 2-1c: Assist developers, faith-based and nonprofit organizations, or other qualified private sector interests with the application and development of projects. Allocate resources in the form of a dedicated County staff member to assist with entitlements, site identification, public facility fee waivers, and density bonuses. Develop an informational packet and conduct outreach to religious/faith-based institutions in high- and highest-opportunity areas in the county to educate them about recent changes in State law (e.g., the Affordable Housing on Fair Lands Act [SB 4]). The County will also connect interested landowners with experienced nonprofit affordable housing developers, provide technical assistance to identify opportunities for funding, reducing permit fees, and reducing development standards.	Assist in supporting the development of at least 250 subsidized very low- and low-income income units over the planning period. Subject to funding availability, provide development subsidy for at least three affordable housing developments by December 2029. Prioritize subsidies for financing for rental housing units affordable to lower-income households and households with special needs, and projects in moderate- or above-moderate resource areas. Focus efforts in neighborhoods with higher concentrations of special needs populations and lower-income residents (i.e., Rouse/Colorado, Bret Harte, and Airport), with at least 75 to 125 affordable units targeted in high-resource and/or above moderate-income areas. County staff member to assist as needed on an ongoing basis. Create and disseminate informational packet by December 2026 and conduct outreach to religious/faith-based institutions biennially, specifically pertaining to SB 4. Provide technical assistance on a project-by-project basis.
Action 2-1d: Ensure a streamlined process for affordable housing development that provides one-stop access to staff from the various County agencies involved in the development process.	Maintain current information on the development process, potential fee reductions, and the density bonus program on the County's website.
Action 2-1e: Work with the Stanislaus Urban County partners to close out the Neighborhood Stabilization Program (NSP) in a manner that retains the County's portion of the funds for supporting housing, including infrastructure needed to support the preservation of existing housing and the development of new housing opportunities.	Ongoing.
Action 2-1f: Continue to support partnerships with Community Development Corporations as a means of attracting different sources of funding and creating innovative funding models to support housing development.	Meet with at least one Community Development Corporation annually.
Action 2-1g: As authorized by the Board of Supervisors, complete the necessary environmental review needed to allow for housing development within the Salida Community Plan.	Conduct the environmental review and complete environmental review within three years of Board of Supervisors authorization.
Action 2-1h: Modify, as needed, the Public Facilities Fee waivers or deferrals to apply to farmworker housing occupied by moderate income farmworkers (between 80 and 120 percent of AMI).	Work with consultant to develop and present modifications to the Public Facilities Fees Committee by February 2026. Recommended amendments will go to the Board of Supervisors for consideration.
Action 2-1i: Provide technical assistance to prospective developers interested in developing housing for extremely low-income (ELI) households. Defer Public Facility Fees for housing developments providing ELI housing. Develop and advocate for an update to RFP scoring criteria to prioritize technical assistance for affordable housing developments providing 50 percent or more ELI housing units.	Hold at least two meetings for developers interested in affordable housing for ELI households to provide technical assistance. Hold meetings in and regarding neighborhoods with higher concentrations of ELI households (i.e., Rouse/Colorado, Bret Harte, and Airport). Defer the PFF fees for two housing developments providing 50 percent or more ELI units. Recommend a scoring preference for ELI priority to the Community Development Committee by 2026.
Implements the Following Policies	2B, 2C, 2D, 2E

Actions	Objective and Timeframe
Responsible Agency	County Planning & Community Development County Behavioral Health and Recovery Services County Community Services Agency Chief Executives Office
Funding Sources	Federal, State, and Local Funding

Program 2-2 Density Bonus

The County offers residential density bonuses to encourage affordable housing development. The County can grant a number of incentives in exchange for a portion of a development being affordable to lower- and moderate-income households, senior or student housing, or installing on-site childcare. These incentives include density bonuses over the otherwise allowed maximum density, reductions in parking standards, regulatory concessions, and waivers to development standards. These units must remain affordable for a period of no less than 55 years and each project must enter into an agreement with the County and be monitored by the Housing Services Division to ensure compliance. The County's current Density Bonus was adopted in 2015 and must be updated to be consistent with State law.

Actions	Objective and Timeframe
Action 2-2a: Update the Density Bonus Ordinance to bring it into compliance with State law and remove the requirement for Planning Commission approval of Density Bonus applications.	Adopt updated Density Bonus Ordinance by December 2025.
Action 2-2b: As part of Density Bonus Ordinance update, discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond State law is appropriate for the County. This is specific to projects that already meet the State required percentage of affordable units at the time of application.	Meet with four qualified housing developers by December 2025, prior to updating the Density Bonus Ordinance.
Action 2-2c: Ensure that housing developers are informed about the County's density bonus program during pre-development conferences, inquiries, and at application and highlight the additional development potential available.	Ongoing on a case-by-case basis.
Action 2-2d: Provide technical assistance to developers on how to use Density Bonus incentives. Promote density bonus for childcare facilities.	Meet with one qualified developer annually to provide information on the County's Density Bonus program. Maintain current information on the County's website, including notice of the Density Bonus update, within one month of adoption.
Action 2-2e: Adopt a local density bonus ordinance that exceeds state minimums. Provisions may include higher bonuses (e.g., up to 100 percent for 100 percent affordable projects), additional incentives (e.g., reduced parking, height and setback waivers), or incentives for diversifying affordability and/or family-sized units.	Adopt enhanced density bonus ordinance by December 2026. Facilitate the approval of two projects under enhanced provisions during the planning period.
Implements the Following Policies	2B
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 2-3 Housing Choice Vouchers

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

Actions	Objective and Timeframe
Action 2-3a: Refer HCV holders to a list of properties compiled by SRHA that are actively participating in the Housing Choice Voucher Program.	Provide a link to the SRHA "For Rent" directory on the County's website by December 2025.
Action 2-3b: Ensure potential and existing tenants and landlords or property managers are informed of the California Fair Employment and Housing Act (FEHA) prohibiting housing discrimination based on source of income (including housing choice vouchers). Provide tenant/landlord counseling services and conduct ongoing outreach to inform tenants of their fair housing rights.	Require any County-contracted fair housing providers to disseminate information about FEHA by December 2025. Provide tenant/landlord counseling services upon request. Work with fair housing providers and community partners to conduct outreach to tenants regarding their fair housing rights at least twice per year.
Action 2-3c: Partner with the Stanislaus Regional Housing Authority (SRHA) to increase landlord participation in HCV programs by conducting landlord education and outreach on the program and source of income discrimination.	Partner with SRHA to make HCV program fact sheet available at County offices serving the general public and on the County's website by January 2026. Provide fact sheets to property owners seeking building permits for Accessory Dwelling Units (ADUs). Focus outreach in Higher Resource areas, such as Salida, East Oakdale, and Hickman.
Action 2-3d: Provide support to SRHA as necessary to seek additional funding that can be used, in addition to HCV funds, to provide subsidies to lower-income households to bring monthly rents in line with affordability guidelines, or help with moving costs, security deposits, or application fees.	Meet with SRHA by June 2026 to identify funding needs and opportunities. Aim to assist 15 households annually.
Implements the Following Policies	2C
Responsible Agency	County Planning & Community Development County Community Services Agency
Funding Sources	Federal and State Funding

Program 2-4 Support Homeownership Opportunities

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

Actions	Objectives and Timeframe
Action 2-4a: Continue to identify and pursue federal, state, and regional programs to move very low-, low-, and moderate-income families from renters to homeowners, such as HUD's Homeownership Voucher Program, down payment and closing cost assistance, mortgage financing, and mortgage credit certificates for homebuyers.	Annually identify potential funding sources and, where eligible, pursue funding either directly or by supporting other agencies in their efforts to secure funding. Work with partner agencies to establish an information network connecting potential homeowners to funding sources. Focus outreach to areas at high risk of displacement, and Lower Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport).

Actions	Objectives and Timeframe
Action 2-4b: Partner with local nonprofit agencies to provide pre-purchase home buying counseling for residents to provide information on mortgage readiness, fair housing education, budgeting for a mortgage payment, credit education, money management, and identifying and avoiding predatory lending.	Provide homebuying counseling to at least 20 residents annually. Coordinate with at least one non-profit organization or employment-related organization, such as teachers' associations, school districts, and community-based service providers, to increase awareness of, and access to, housing resources and financial planning services. Focus outreach to areas at high risk of displacement, and Lower Resource areas (i.e., Rouse/Colorado, Bret Harte, and Airport).
Implements the Following Policies	2A
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 2-5 Housing Trust Fund

To increase funding available for affordable housing development and/or maintenance, the County will study the feasibility of establishing a Housing Trust Fund.

Actions	Objective and Timeframe
Action 2-5a: Conduct a feasibility analysis of establishing or joining a local Housing Trust Fund. Study should include analysis of available resources, potential for impact, prioritization of use of funds (i.e., income targeting, rental vs. ownership projects).	Complete feasibility analysis by December 2025. Depending on results of analysis, establish a trust fund or partner with an existing trust fund by December 2026. In developing the program policies, advocate for the inclusion of a scoring system that includes a bonus for projects in Lower Resource areas. Aim to have the County's funding assist at least eight lower-income households through the creation, rehabilitation, and/or preservation of units in the unincorporated area annually.
Implements the Following Policies	2D
Responsible Agency	County Planning & Community Development County Executive Office
Funding Sources	Federal and State Funding

Program 2-6 Regional Collaboration to Facilitate Housing Throughout Stanislaus County

Stanislaus County's Land Use Policies have long recognized the need to balance conservation of agricultural land with the need for urban development. While the County's General Plan identifies areas suitable for residential development, there are constraints to developing in the unincorporated areas and, as such, the County recognized that, with some exceptions, development may be better suited to occur within the incorporated areas.

To facilitate development of affordable housing countywide, the County offers deferrals and waivers of its Public Facilities Fees for qualified affordable housing projects to projects regardless of their locations (incorporated or unincorporated) and has partnered with cities and affordable housing developers to assist with the funding of housing developments located within cities. This monetary support has aided the capacity of cities to meet their RHNA obligation without a reduction in the County's overall RHNA obligation.

Recognizing that the need to increase housing opportunities of all types extends beyond jurisdictional boundaries, the County initiated the Housing Stanislaus Initiative in 2021 with the goal of developing a common vision for housing in Stanislaus County. The desired outcomes of the Initiative are to:

- Establish a shared understanding of the needs, challenges, and opportunities associated with housing in Stanislaus County;
- Develop a unified and actionable countywide vision and strategy framework inclusive of priorities, policies, and investments – for accelerating affordable and market-rate housing in Stanislaus County; and
- Identify and prioritize projects and programs for housing development.

Released in late 2023, strategies emerging from the Housing Stanislaus Initiative effort include the need to:

- Increase capacity within public agencies to keep pace with housing demand and enable more proactive engagement with developers;
- Pursue ongoing refinement of policies, procedures, and regulations that result in mutual benefit to community, public agency, and development applicant;
- Create access to capital, with a focus on capital for affordable and workforce housing;
- Prepare development plans for new areas appropriate for housing and for upgrading infrastructure in existing areas to accommodate housing use;
- Proactively engage developers and property owners of vacant and underutilized properties to encourage their pursuit of housing development; and
- Foster the development of a variety of housing types.

The emerging strategies reflect stakeholders of all interests that have shared their ideas on how local housing needs should be addressed.

Another County-led regional initiative has been Stanislaus 2030, a public-private partnership that aims to advance a shared vision for economic prosperity for all. The culmination of the first phase of Stanislaus 2030 was the 2022 publishing of the Investment Blueprint which includes the highest-leverage opportunities that will move the region's economy forward in the coming decades. The County's regional initiatives recognize the need for balance between jobs and housing in order to have a healthy and strong community.

The County's regional collaborations have also included over 20 years of partnership with various cities for HUD entitlement funding. As the lead entity for the Stanislaus Urban County, the County partners with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford for Community Development Block Grant and Emergency Solutions Grant funding. The City of Turlock and the Stanislaus Urban County have partnered as the City of Turlock/Stanislaus County HOME Consortium for HOME Investment Partnership (HOME) funding, with Turlock serving as the lead entity. Effective July 1, 2023, the County has taken on the role as the lead entity for the new Stanislaus HOME Consortium; a continued partnership between the Stanislaus Urban County and the City of Turlock. The County is also the administrator of the Permanent Local Housing Allocation (PLHA) funding allocated by the State of California on the basis of the 2017 HUD entitlement to the Stanislaus Urban County.

Actions	Objective and Timeframe
Action 2-6a: Incorporate the sharing of the RHNA into the Local Agency Formation Commission (LAFCO) Sphere of Influence (SOI) negotiation process and annexation requests, recognizing the loss of County housing opportunities within the SOI area and County funding provided for housing projects within the city limits.	Establish criteria to be used by the County in negotiating RHNA sharing during LAFCO SOI negotiation and annexation requests by January 2026.
Action 2-6b: Participate in policy and program development with cities and other regional agencies to implement Housing Stanislaus strategies and to prioritize funding for affordable housing projects and infrastructure needed to preserve existing housing and support new housing.	Annually meet with staff from cities and other regional agencies to assess implementation of Housing Stanislaus strategies, share successful practices, and troubleshoot ongoing challenges.
Action 2-6c: Continue to collaborate with cities and other regional agencies to implement Stanislaus 2030.	Annually, evaluate opportunities to incorporate 2030 strategies into housing program implementation.
Action 2-6d: Assemble an ongoing advisory committee to monitor progress and foster implementation of the Housing Stanislaus Initiative strategies.	Establish an advisory committee by December 2025.
Action 2-6e: Continue coordination within County agencies (Behavioral Health and Recovery Services, Community Services Agency, and Planning) to address the continuum of housing needs (i.e., "homelessness to homeownership").	Annually convene a meeting with all three County agencies to discuss respective housing programs/efforts to align efforts and identify and prioritize opportunities for housing mobility and place-based strategies (e.g., HCVs, anti-displacement policies, public investment in services and amenities) to improve community revitalization.
Action 2-6f: Continue to collaborate with funding agencies and non-profit housing developers and public service providers for the development of permanent supportive housing.	In coordination with the CSOC, annually provide an opportunity for non-profit housing developers, public service providers, and funding agencies to share successful practices, and troubleshoot ongoing challenges with an aim at expanding opportunities for collaboration within the community.
Implements the Following Policies	2E, 2F
Responsible Agency	County Planning & Community Development County Behavioral Health and Recovery Services County Community Services Agency Chief Executive Office
Funding Sources	Federal and State Funding; Department Revenues

Goal 3: Increase housing production by providing adequate sites for a variety of housing types and removing constraints to residential development.

Policies

3A **Diversity of Housing Types:** The County shall continue to implement land use policies and investigate amended policies that allow for a range of residential densities and housing types, prices, ownership, and size, including low-density, single-family uses; moderate-density townhomes; and higher-density apartments, condominiums, transit-oriented developments, live-work units, ADUs, and units in mixed-use developments.

3B **Provide and Maintain Adequate Sites to Accommodate the RHNA.** The County shall maintain appropriate land use designations and densities to accommodate an increased supply of housing units by type, cost, and size to meet its share of the regional housing need in alignment with countywide housing priorities.

3C **No Net Loss Zoning:** The County shall make findings related to the potential impact on the County's ability to meet its share of the regional housing need when approving discretionary entitlements to rezone residentially designated properties or develop a residential project with fewer units or at a higher income level than what is assumed for the site in the Housing Element Sites Inventory, consistent with zoning requirements in Government Code Section 65863.

3D **Streamline Housing Entitlement and Permitting Process.** The County shall streamline the housing approval and permitting process, particularly for affordable housing, throughout County departments.

3E **Clear Development Standards and Approval Procedures:** The County shall create and administer clear objective development standards and approval procedures for a variety of housing types, including, but not limited to, multi-family housing and emergency shelters.

3F **Facilitate Infill Development.** The County shall utilize infill development strategies to further develop and improve existing neighborhoods with the infrastructure to serve new development.

3G **Facilitate Strategic Development on Large Lots.** The County shall support and facilitate strategic development on large lots to promote cohesive and connected development that provides housing for a variety of household incomes and types.

3H **Residential Uses Close to Services:** The County shall encourage development of residential uses close to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.

3I **Compatible Development of Underutilized Sites:** The County shall encourage compatible residential development in areas with underutilized non-agricultural lands.

3J **Flexible Standards and Regulations:** The County shall allow flexibility within the County's standards and regulations to encourage a variety of housing types.

3K **Adaptive Reuse:** The County shall support innovative strategies for the adaptive reuse of residential, commercial, and industrial buildings to provide for a variety of housing types and residential uses.

3L **Residential Sites Inventory:** Maintain a vacant and underutilized residential Sites Inventory and assist residential developers in identifying land suitable for residential development.

3M **Preserve Multifamily Land Use:** Preserve the existing supply of land that allows multifamily dwellings and discourage development on such land at lower residential densities or with solely nonresidential land uses.

3N **Infrastructure Development.** The County shall continue to utilize its HUD CDBG funding allocation, and seek new funding, for infrastructure needed to upgrade existing areas as a means of preserving existing housing units and to accommodate new housing uses.

3O **Development within Cities:** The County will continue to work with cities to leverage available funding for the development of affordable housing projects throughout Stanislaus County.

3P **Public Facility Fee Waivers:** The County shall continue to waive Public Facilities Fees for qualified affordable housing projects to be developed throughout Stanislaus County.

Programs

Program 3-1: Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth

Stanislaus County's share of the Regional Housing Need Allocation (RHNA) is 2,475 units for the 2023-2031 Housing Element planning period. With anticipated pipeline projects and projected ADUs, a total of 437 units can be credited toward the County's RHNA. The remaining 2,072 RHNA units (574 very low-, 398 low-, 458 moderate-, and 608 above moderate-income units) must be accommodated through adequate sites planning.

Actions	Objective and Timeframe
Action 3-1a: Maintain an updated inventory of housing sites and actively promote sites available for lower- and moderate-income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations.	Publish on the County's website by June 2026 and update annually after submitting the County's Annual Progress Report every April.
Action 3-1b: Actively promote sites available for affordable housing development to potential developers, private and nonprofit organizations, and other interested persons and organizations.	Send annual notices promoting the Housing Elements Sites Inventory and offering to meet with developers to discuss affordable housing development.
Action 3-1c: Maintain an updated list of residential housing developments that have been submitted, approved, and denied throughout the housing cycle. Comply with California law regarding reporting requirements including, without limitation, annual reporting in accordance with Government Code Section 65400.	Publish by December 2025 and update annually as part of the Annual Progress Report.
Action 3-1d: The County has identified four parcels of County-owned land for the development of affordable housing: one in Empire (APN 133-017-006) and three in Keyes (APNs 045-065-044, 045-064-057, and 045-064-058). The County will comply with the Surplus Land Act in the disposition of all publicly owned land including those four parcels in the site inventory. Once agreements are in place for development and disposition of those properties, the County will prioritize entitlement processing and building permit issuance, and if appropriate, commit funding. Consistent with Program 3-2 (No Net Loss Zoning), the County will monitor all sites in the inventory and if development is not occurring in line with assumptions sufficient to keep on track to meet the share of the RHNA, the County will identify alternative sites.	**Development and disposition of publicly owned inventory sites:** The County expects to enter into a development and disposition agreement for the site in Empire (APN 133-017-006) by the end of 2025. The County will begin the development and disposition process for the Keyes site (APN 045-065-044, 045-064-057, and 045-064-058) in January 2026. Both sites are expected to yield 22 units of affordable housing. Report on identified surplus land in the Housing Element Annual Progress report on an annual basis. Monitor sites annually in accordance with Program 3-2. If needed, identify an alternative site in a Moderate or High Resource area, if possible, to yield at least 20 units, by January 2028.
Action 3-1e: Amend Zoning Ordinance to prohibit development of single-family dwellings in multi-family zones or land use designations.	Adopt Zoning Ordinance amendment by December 2025.
Action 3-1f: Proactively engage property owners of vacant and underutilized properties to encourage their pursuit of housing development.	Send annual notices to property owners of vacant and underutilized sites listed on the Sites Inventory offering to meet with them to discuss development options for their property.
Action 3-1g: Rezone sites with minimum density and development standards enumerated in Housing Element Law, Government Code Section 65583.2 (h) and (j), to facilitate achieving maximum densities	Complete all necessary General Plan and Zoning Ordinance text and map amendments by December 2025.

Actions	Objective and Timeframe
and to accommodate the County's shortfall of capacity in the 6th cycle Housing Element Sites Inventory (972 lower-income units and 233 moderate-income units). Rezone sites shall be subject to the following standards: ▪ Permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. "By-right" means approval without discretionary review. ▪ Permit the development of at least 16 units per site. ▪ Establish a minimum density of 20 units per acre and a maximum density of at least 20 units per acre for all rezone sites to accommodate lower-income RHNA. ▪ Ensure that either: a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses; or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed uses, all sites designated for mixed uses must allow 100 percent residential use and require that residential uses occupy at least 50 percent of the floor area in a mixed-use project.	
Action 3-1h Amend the Zoning Ordinance to remove the 6,000 square foot minimum lot size and 65-foot-wide lot width requirements in R-3 zones to allow housing to be developed at a higher density. Remove the minimum lot and depth requirements in R-A zones and amend the R-2 ordinance to allow for additional housing types	Adopt Zoning Ordinance amendment by December 2025.
Action 3-1i: Amend the Zoning Ordinance to allow for increased residential development on irregular and smaller lots in existing communities, including: reducing the minimum lot size required for residential development in the R-1, R-2, and R-3 zoning districts; increasing lot coverage maximums in the R-1, R-2, and R-3 zoning districts; and allowing for the development of up to 14 dwelling units per acre ministerially in the R-2 zoning district.	Adopt Zoning Ordinance amendment by December 2025.
Action 3-1j Support a variety of housing types in Racially Concentrated Areas of Affluence (RCAAs) through encouraging ADU production and the maintenance of existing units through implementation of the County's rehabilitation program (Program 1-1).	Develop 35 ADUs in RCAAs throughout planning period; target use of rehabilitation funding in RCAA area by June 2026.
Implements the Following Policies	3A, 3B, 3D, 3K, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-2 No Net Loss Zoning

Government Code Section 65863, otherwise known as "No Net Loss" law, prevents the loss of existing housing and land available for future discretionary residential development by ensuring that cities and counties "identify and make available" additional adequate sites if a housing project is approved with fewer units by income category than what is identified in the Housing Element to meet RHNA. In compliance with State law, the County will expand and improve upon the ongoing no net loss efforts to develop a procedure to track:

- Unit count and affordability assumed on parcels included in the Sites Inventory
- Actual number of units achieved and affordability when parcels are developed

- Net change in capacity and summary of remaining capacity in meeting remaining RHNA

Unit count and affordability are identified in the Sites Inventory.

Actions	Objective and Timeframe
Action 3-2a: Monitor inventory sites throughout the planning period to ensure the County remains on track towards satisfying its RHNA target for all income levels.	Monitor development of inventory sites at least annually with submittal of Annual Progress Report every April.
Action 3-2b: Maintain an administrative list of additional sites with appropriate zoning that can be added to the County's Sites Inventory if and when the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County's remaining RHNA, by income level, for the planning period.	Create list by December 2025 and update annually as needed.
Action 3-2c: If development of inventory sites does not occur at densities assumed in the Sites Inventory during the planning period, identify alternative sites from the County's administrative list of additional sites with appropriate zoning.	Rezone sufficient sites within six months of identification of the shortfall.
Action 3-2d: Regularly review Measure E to evaluate its effect on the County's ability to meet its housing needs. As a result of the biennial Measure E evaluation, the County may identify Measure E-impacted lands within a LAFCO-adopted Sphere of Influence or an adopted County Community Plan area for rezoning, and pursue approval from HCD to activate the exemption from County voter approval. An exemption of up to 10 acres per year for residential use may occur when HCD certifies in writing that all of the following circumstances exist: (a) the approval is necessary and required to meet the County's legal fair share housing requirement; and (b) there is no other land in the County or the cities in the County already designated for urban use that can accommodate the County's legal fair share housing requirement. Additional acreage may be designated for residential use if the Board finds, and HCD certifies in writing, that the additional acreage is necessary to meet the Board's legal fair share obligation based on maximum multifamily densities. Any proposal approved under this subsection shall be required to have all housing units permanently affordable to persons or families of very low, low, and moderate income. Any development project consisting entirely of farmworker housing is also exempt from requiring a vote of the electorate and does not include HCD certification.	Review the Sites Inventory annually as part of the Housing Element Annual Progress Report to determine if additional sites are needed. Establish an administrative list of Measure E lands that could be utilized to meet housing needs by March 2025 and update annually as needed. If it is determined that a lack of adequate sites exist, Measure E exemptions may be triggered.
Action 3-2e: The County shall create and maintain a countywide inventory of potential residential infill sites. The inventory will include vacant and underutilized lots with residential zoning districts and commercial districts that allow residential uses. The County shall make this information available to the public by posting the inventory on the County's website and providing the inventory, upon request, to developers visiting the Planning Department.	To ensure that developers are aware of all potential multi-family residential sites, the inventory will be updated on an annual basis and notice of updates will be distributed to interested developers of record. Permit 250 units on infill properties within the planning period.
Implements the Following Policies	3B, 3C, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-3 Replacement Housing

Pursuant to AB 1397 (Adequate Sites) passed in 2017, the County will amend the Zoning Ordinance to require the replacement of existing residential units on nonvacant RHNA sites as a condition of discretionary project approval for development. Specifically, sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households, shall replace those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall also be consistent with those set forth in the State Density Bonus Law.

Actions	Objective and Timeframe
Action 3-3a: Amend the Zoning Ordinance to establish the replacement requirements pursuant to Government Code Section 65583.2(g)(3)).	Amend Zoning Ordinance by December 2025.
Implements the Following Policies	3C
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-4 Provide Adequate Sites for Lower-Income Households on Nonvacant and Vacant Sites Previously Identified

Housing Element Law (Government Code Section 65583.2(c)) stipulates that inventory sites that were identified in prior housing elements may, in the 6th cycle, only count as available to accommodate the lower-income RHNA if they are rezoned for by-right development and require at least 20 percent of units in proposed projects on those sites be affordable to lower-income households. The County's Site Inventory does not include any sites that were used in previous Housing Element cycles. However, if additional sites must be identified per No Net Loss law (Program 3-2), and those sites were used in prior Housing Elements, the County will amend the zoning ordinance to include these provisions.

Actions	Objective and Timeframe
Action 3-4a: Pursuant to Government Code Section 65583.2 subdivision (c), amend the Zoning Ordinance to establish standards for any sites the County may identify during the planning period that meet the following criteria: ▪ A vacant site for RHNA identified in the previous two Housing Element cycles; or ▪ A nonvacant site for RHNA identified in the previous Housing Element cycle. Standards shall be as follows: ▪ Permit by right housing developments in which at least 20 percent of units as affordable to lower-income households; ▪ Permit the development of at least 16 units per site; and ▪ Ensure sites permit a minimum density of 20 dwelling units per acre.	Amend Zoning Ordinance within six months of identifying sites that meet the criteria.
Implements the Following Policy	3K
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-5 Adaptive Reuse

In recognition of older commercial buildings that may no longer be occupied by the highest and best uses or compatible uses with its surrounding neighborhoods and that the economic impacts of the COVID-19 pandemic may have further accelerated the decline of these properties, the County will pursue opportunities to establish alternative regulations for the conversion of existing buildings to other uses.

Actions	Objective and Timeframe
Action 3-5a: Evaluate, and if appropriate, amend the Zoning Ordinance to remove potential constraints for adaptive reuse, such as review/approval process and minimum parking standards. Promote adaptive reuse to property owners and interested developers through public outreach.	Evaluate the Zoning Ordinance by December 2025 and, if necessary, revise Zoning Ordinance within one year.
Implements the Following Policy	3L
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-6 Zoning for a Variety of Housing Types

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, smaller-scale multifamily housing in existing single-family neighborhoods, manufactured housing, supportive and transitional housing, single-room occupancy units, residential care facilities, and emergency shelters. This program, by allowing a wider range of housing types in all neighborhoods, would also provide for a variety of housing prices, styles, and sizes, which contributes to neighborhood stability by offering more affordable and move-up homes and accommodating a diverse mix of incomes.

Actions	Objective and Timeframe
Action 3-6a: Amend Zoning Ordinance standards to allow for housing options that provide greater flexibility and affordability in the housing stock. This may include allowing shelters, transitional housing, and tiny homes with wraparound services on land owned by faith-based organizations, social services agencies, and nonprofits that do this work in the community and on publicly owned land.	Conduct stakeholder meetings by December 2025 to identify options and, if viable options are identified, amend Zoning Ordinance by December 2026. Connect organizations seeking to develop affordable housing to development resources, such as community development organizations, non-profit developers, and free pre-development meetings. Aim to conduct at least two pre-development meetings for potential projects annually and to facilitate the development of at least 12 units by the end of the planning period.
Action 3-6b: Review all residential zoning districts and land use designations for additional development in low-density neighborhoods. Amend the Zoning Ordinance to allow, by-right or via streamlined review process, a mix of dwelling types and sizes, specifically "missing middle" housing types (e.g., duplexes, detached ADUs, courtyard buildings).	Complete review by December 2025 and amend Zoning Ordinance by December 2026. Aim to facilitate at least 12 missing middle-type units in low-density residential areas per year of the planning period. Focus efforts in lower-density residential areas, High Resource and RCAA areas, (i.e., Salida, East Oakdale, Denair, and Hickman).
Action 3-6c: Amend the Zoning Ordinance to remove the requirement for a conditional use permit for residential care facilities for seven or	Amend Zoning Ordinance by December

Actions	Objective and Timeframe
more persons in all zones that allow residential uses, subject only to provisions for residential uses of the same type in the same zone, regardless of licensing. Establish objective standards for large and small residential care facilities to provide certainty to applicants through the permitting process. Amend the Zoning Ordinance to include a definition that defines residential care homes for six or fewer residents as a residential use.	2025.
Action 3-6d: Amend the Zoning Ordinance to comply with Government Code Section 65661 which requires: ▪ A Low Barrier Navigation Center to be a use by-right in areas zoned for mixed-use and nonresidential zones permitting multifamily uses, provided specific requirements of the law are met; and ▪ Amend the definition of "emergency shelters" to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.	Amend Zoning Ordinance by December 2025.
Action 3-6e: Amend the Zoning Ordinance definitions of "multiple dwellings" and "dwelling groups" for clarity and consistency.	Amend Zoning Ordinance by December 2025.
Action 3-6f: Amend the Zoning Ordinance to define Single-Room Occupancy developments as a permitted residential use in multi-family districts. Establish development standards for SROs that facilitate development.	Amend Zoning Ordinance by December 2025.
Action 3-6g: Amend the Zoning Ordinance to address the requirements of SB 9, including developing objective design standards for qualifying projects.	Amend the Zoning Ordinance by December 2025.
Action 3-6h: The County will promote other types of alternative housing options including single-room occupancy developments or conversions, group homes, and permanent supportive housing.	At least once a year, the County will meet with developers and service providers to promote other types of alternative housing with a focus on increasing awareness of housing options and providing technical assistance. Aim to facilitate the permitting of one alternative housing project annually in areas of high cost burden and in existing communities near transportation and services.
Action 3-6i: Amend the Zoning Ordinance to allow for mobile homes in the Historical Site (HS) zoning district, subject to allowable aesthetic and architectural requirements as those required for conventional dwellings.	Amend the Zoning Ordinance by December 2025.
Action 3-6j: Amend the Zoning Ordinance to develop specific parking standards based on unit size in multifamily buildings.	Amend the Zoning Ordinance by December 2025.
Action 3-6k: Assess and amend the County's Zoning Ordinance to permit the development of innovative or unconventional housing types, such as tiny home villages and cottage housing, to expand the County's ability to address the homelessness crisis in the unincorporated areas.	By July 2026, hold a first round of public meetings in communities with higher levels of homelessness (e.g., Empire, Keyes, West Modesto) to solicit input from residents on community-specific needs and preferences for developing innovative or unconventional housing types in their communities. Assess the Zoning Ordinance to identify needed amendments by December 2026. By April 2027, hold a second round of public meetings in the same communities to

Actions	Objective and Timeframe
	provide an update on the proposed zoning ordinance changes and seek community feedback prior to their presentation to the Planning Commission. Present a recommendation to amend the County's Zoning Ordinance to the Planning Commission by July 2027, with particular focus in communities with higher levels of homelessness (e.g., Empire and Keyes).
Action 3-6l: Monitor the number of lot splits and units created through implementation of the County's SB 9 ordinance with a goal of approving two lot splits per year.	Monitor lot splits on an ongoing basis. By December 2027, if less than two lot splits per year are achieved, develop technical assistance tools and conduct targeted outreach in higher-income, higher-resource, lower-density neighborhoods (i.e., Racially Concentrated Areas of Affluence) to promote SB 9 lot splits.
Implements the Following Policy	3D, 3E, 3F, 3G, 3N
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-7 Expedited Project Review

The County continues to improve the efficiency of the development review process. As a response to the housing shortage in the State of California, Government Code Section 65920 was amended to restrict local rules that limit housing production. Amendments to Government Code Section 65920 changed the Permit Streamlining Act by creating a more ministerial, rather than discretionary, two-step application process for housing projects. The County will continue to identify efficiencies for the development process in line with Government Code Section 65920. The County will also coordinate with developers to ensure a timely application and development process.

Actions	Objective and Timeframe
Action 3-7a: Continue to offer a free Pre-Application Review process for developers. This review provides developers with a preview of potential issues the proposed development that could result in major costs before they spend money developing plans and submitting an application.	Ongoing on a case-by-case basis.
Action 3-7b: Assess existing processes to identify streamlining opportunities, such as ministerial review for projects that include a percentage of affordable housing units.	Assess existing processes by January 2026 and, if opportunities to streamline are determined feasible, revise the process within one year.
Action 3-7c: Update the County's permit process to comply with AB 2011 which allows for ministerial, by-right approval for affordable housing on commercially zoned land, and also allows such approvals for mixed-income housing along commercial corridors, as long as the projects meet specified affordability, labor, and environmental criteria.	Update the permit process to comply by January 2026.
Action 3-7d: Maintain staffing assigned to the One-Stop-Shop at a capacity level adequate to keep pace with demand and enable more proactive engagement with developers.	Assess staffing capacity with all One-Stop-Shop partners annually.
Action 3-7e: Implement a web-based interactive permit guide that outlines a step-by-step process for residential development including:	Fully implement use of a web-based

Actions	Objective and Timeframe
identifying steps in the entitlement and building permit process, detailed information on development incentives, and funding programs and resources for affordable housing development.	interactive permit guide by December 2025.
Action 3-7f: Develop objective design standards for housing development that will help the County meet RHNA obligations, including, but not limited to, multi-family housing, ADUs, SROs, duplexes, and triplexes, while providing a streamlined permitting process.	Adopt objective standards, as necessary, by December 2025.
Action 3-7g: Amend the Zoning Ordinance to address updates to SB 35 and create written procedures for the Streamlined Ministerial Approval Process.	Amend Zoning Ordinance and create written procedures by December 2025.
Action 3-7h: Develop policies and procedures associated with the Housing Crisis Act (SB 330).	Develop and adopt policies and procedures by December 2026.
Implements the Following Policies	3D, 3E,3C, 3Q
Responsible Agency	County Planning & Community Development County Public Works County Department of Environmental Resources County Fire Warden
Funding Sources	Department Revenues

Program 3-8 Accessory Dwelling Units

Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) represent an important opportunity to create more affordable housing for lower and moderate-income households. This program will promote and facilitate the development of ADUs throughout the unincorporated County.

Actions	Objective and Timeframe
Action 3-8a: Conduct a marketing campaign to disseminate existing ADU planning tools, including the County's ADU information website, interactive permit guides, ADU email list, and pre-approved ADU plans.	Advertise the County's ADU planning tools on social media on a biannual basis. Facilitate the development of 184 ADUs over the planning period. Focus outreach efforts in High Resource and Racially Concentrated Areas of Affluence (i.e., Salida, East Oakdale, Denair, and Hickman).
Action 3-8b: Work with organizations, such as community development corporations, to identify gap funding for lower-income homeowners to build ADUs, or to develop or preserve ADUs for income-qualified tenants.	Evaluate the feasibility of using PLHA funds for this purpose by December 2025.
Action 3-8c: Partner with an organization involved in affordable housing or community development activities to provide informational workshops to property owners about the ADU permitting and building process. Target outreach to property owners in Low and Moderate Resource areas and provide workshops and materials appropriate for residents with limited English proficiency.	Facilitate one workshop annually with the objective of facilitating at least 45 ADUs in Low and Moderate Resource areas.
Action 3-8d: Through public-facing materials and outreach activities, promote the development of ADUs in High Resource areas and Racially Concentrated Areas of Affluence, like Salida, East Oakdale, and Hickman.	Facilitate the development of at least 45 ADUs in Higher Resource and higher-income areas.

Actions	Objective and Timeframe
Action 3-8e: Monitor ADU production on an annual basis to ensure that construction targets are meeting RHNA obligations. Monitor review times for ADU and JADU permit applications and, if necessary, implement process improvements and promote the availability of ADU technical assistance to key community stakeholders (e.g., loan providers). If development is falling short of assumptions, modify development standards, consider reducing fees beyond the requirements of State law.	Promote development of ADUs with a goal of issuing building permits to 184 ADUs during the planning period (or 23 ADUs per year). Review permit processing times for ADUs by January 2027 and implement any needed streamlining actions by January 2028. Monitor production and affordability levels on an annual basis. If the County is trending to miss its target by December 2027, modify and/or develop new incentives to promote ADU development by December 2028, including identifying additional sites or rezoning to accommodate the RHNA.
Action 3-8f: The County will continue to make available pre-approved ADU plans on the County website and will post on the County's website ADU plans provided by the private sector in accordance with State ADU law.	Post all available ADU plans by February 2025 and update as new requests are received.
Action 3-8g: Incentivize the creation and affordability of ADUs by utilizing PLHA and partnering with a local lending institution or Community Development Financial Institution (CDFI) to develop an ADU financing assistance program for Urban County cities. Current PLHA funding allows for a maximum of seven loans between all partner jurisdictions.	Develop new incentives to promote affordable ADU development by December 2028. Aim to assist at least two ADUs in unincorporated Stanislaus County during the planning period and maintain them as affordable to lower-income households.
Implements the Following Policy	3J, 3K
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State funding

Program 3-9 Infrastructure

Infrastructure availability is crucial to the development of housing to meet the County's share of the RHNA. This program will facilitate the prioritization and expansion of services for affordable housing projects.

Actions	Objective and Timeframe
Action 3-9a: Transmit notice of Housing Element adoption to all sewer and water providers serving the unincorporated County area.	Send notice of adoption of the Housing Element to service providers within one month of certification.
Action 3-9b: Continue to assess and prioritize the infrastructure needs of underserved communities.	Annually review and update infrastructure prioritization studies.
Action 3-9c: Continue to prioritize the use of the County's portion of HUD entitlement funding for sewer and water infrastructure projects.	Complete the West Modesto sewer project by the end of the planning period. In Fiscal Year 2029/2030, evaluate funding needs as part of the five-year Consolidated Plan update process to identify funding for future sewer and/or water infrastructure projects, particularly in Lower Resource areas, R/ECAPs, and areas of concentrated poverty, with priority given to areas with failing septic systems. Detail results of the evaluation in the five-year Consolidated Plan.

Actions	Objective and Timeframe
Action 3-9d: Meet with cities with unincorporated pockets of unincorporated residential development within their LAFCO-adopted Sphere of Influence to assess the feasibility of Tax Increment Financing Districts and Enhanced Infrastructure Financing Districts being used to support housing development.	Meet with the cities and complete an assessment by June 2026 and report results as part of the Annual Progress Report. If determined feasible, draft a strategic plan to implement and utilize Tax Increment Financing mechanisms to facilitate residential growth by December 2031.
Action 3-9e: Implement a fee schedule that assesses fees on single-family and multifamily homes proportional to their impact, pursuant to State law.	Conduct a study to evaluate the infrastructure impact of single-family and multifamily homes and update the fee schedule by June 2026.
Action 3-9f: The County will work with water and sewer providers to monitor that there is sufficient water resources and sewer treatment capacity to meet the projected housing need throughout the planning period.	On a project-by-project basis, maintain an open dialogue with utility districts to discuss and evaluate available resources and strategies to conserve water consumption and expand resources to meet the County's projected housing needs. Annually with the publication of the County's Annual Progress Report, monitor the availability of water to serve future projects on identified sites to accommodate the County's share of the RHNA.
Action 3-9g: Continue to seek grant funding to construct infrastructure improvements.	Seek grant funding annually throughout the planning period, beginning in December 2025. Financially assist at least one infrastructure project per year with awarded grant funding, prioritizing projects in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (e.g., Airport, Rouse/Colorado, and Bret Harte).
Action 3-9h: Review policies and guidelines of service providers for compliance with Government Code Section 65589.7 and encourage providers to update policies and procedures to consider low-income and special needs housing developments.	Provide comments to service provider guidelines and procedures by December 2026. If necessary, reach out to service providers to encourage policy updates.
Action 3-9i: Revise the County's infrastructure priority project list as infrastructure projects are completed, prioritizing projects with the greatest health and safety needs.	Review the priority project list for infrastructure improvements after every project completion. In revising the list, give a scoring bonus consideration to Lower Resource areas, R/ECAPs, and areas of concentrated poverty with infrastructure need that can be met with available funding.
Implements the Following Policies	3O
Responsible Agency	Public Works Department County Planning & Community Development County Executive Office
Funding Sources	State and Federal Funding, Department Revenues

Goal 4: Provide housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, and persons with disabilities.

Policies

4A **Address Special Housing Needs:** The County shall address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, and supportive housing.

4B **Housing and Supportive Services:** The County shall promote housing and supportive services for households with special needs including seniors, persons with disabilities, single parents, and individuals experiencing homelessness.

4C **Reasonable Accommodation:** The County shall continue to implement a reasonable accommodation process for persons with disabilities to request exceptions or modifications of zoning, permit processing, and building regulations to ensure housing is accessible.

4D **Support Stanislaus Community System of Care (the local Continuum of Care):** The County shall support the local Continuum of Care in its efforts to meet the needs of homeless families and individuals.

4E **Support Organizations Serving the Homeless Community:** The County shall support the efforts of non-profit and community organizations that provide emergency shelter and other assistance for the homeless population, including alcohol and drug recovery programs.

4F **Range of Housing for Seniors:** The County shall facilitate and encourage the development of a range of housing types for seniors from which support services are readily accessible.

4G **Family Housing:** The County shall encourage the development of housing that provides for families with children (such as larger rental and ownership units for lower- and moderate-income families) and the provision of services such as childcare and after-school care when feasible.

4H **Universal Design Standards:** The County shall implement universal design standards or guidelines that promote accessibility for everyone regardless of age or physical ability.

Programs

Program 4-1 Housing for Special Needs Populations

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.

The County of Stanislaus is a diverse community with many residents who have special housing needs. State law requires the housing element to address the needs of specific groups with special housing needs, including extremely low-income residents, seniors, persons with disabilities, large families, female-headed households with children, and persons experiencing homelessness. The County will continue to monitor its policies, standards, and regulations to ensure that they comply with applicable laws pertaining to housing for special needs populations.

Actions	Objective and Timeframe
Action 4-1a: Establish a scoring criterion for affordable housing projects that encourage the inclusion of units and services needed to support individuals with special needs.	Amend funding policies to establish criteria that encourage special needs housing by June 2026.
Action 4-1b: Adopt policies and procedures for the integration of	Develop guidelines or standards by

Actions	Objective and Timeframe
universal design features, including those needed for persons with disabilities and their caregivers, in housing rehabilitation and housing development projects, to the extent that funding allows.	December 2025.
Action 4-1c: Review the Reasonable Accommodations Ordinance and amend if needed.	Amend Zoning Ordinance by December 2025, if needed.
Action 4-1d: Continue to coordinate the housing efforts of the County's Planning Department, Community Services Agency, and Behavioral Health and Recovery Services to maximize leveraging of existing funding for special needs housing and services, and to build staffing capacity.	Meet regularly with County departments and regional agencies throughout the planning period.
Action 4-1e: Amend Zoning Ordinance to remove references to "nonprofit" in the definition of "family"	Amend Zoning Ordinance by December 2025.
Implements the Following Policies	4A, 4B, 4C
Responsible Agency	County Planning & Community Development Community Services Agency Behavioral Health and Recovery Services
Funding Sources	Department Revenues

Program 4-2 Farmworker Housing

Actions	Objective and Timeframe
Action 4-2a: Continue coordinating with regional partners (County's Agricultural Advisory Board, Stanislaus Regional Housing Authority, agricultural producers, and community-based organizations) to identify changing needs for farmworker housing in the County. Assess current regulations and needs and make changes to the Zoning Ordinance if necessary.	Meet with stakeholders once within six months of Housing Element adoption and present the County's General Plan Update Committee with recommended amendments to the Zoning Ordinance, if any, within six months of the stakeholder meeting.
Action 4-2b: Assist property owners, builders, and non-profit housing developers with securing funding resources, identifying development opportunities, qualifying for density bonuses, and prioritizing infrastructure availability for farmworker housing projects.	Provide technical assistance to facilitate the development of at least 30 units of affordable farmworker housing by December 2031. Annually meet with stakeholders to identify community needs for farmworker housing and identify constraints in the development of farmworker housing.
Action 4-2c: Amend Zoning Ordinance to remove the requirements for a use permit for employee housing and allow ministerial approval for projects with less than 36 beds, in accordance with Health and Safety Code Section 17021.8.	Amend Zoning Ordinance by December 2025.
Action 4-2d: Seek partnerships in providing farmworkers within the community trainings on housing rights to empower them to advocate for better living conditions and address housing concerns.	In partnership with a non-profit or community group serving farmworkers within the community, conduct an annual training on farmworker housing rights.
Action 4-2e: Actively partner with HCD and the UC Davis Western Center for Agricultural Health and Safety on their upcoming California Farmworker Housing Study, which is being conducted to fulfill the requirements of AB 1654 (2022).	Contact Western Center for Agriculture Health and Safety representatives within six months of Housing Element adoption. Once study is complete, work with UC Davis and other community partners to assess the feasibility of program implementation.
Action 4-2f: Coordinate with the Farmworker Advisory Committee (approved by the Board of Supervisors November 12, 2024) to enhance understanding and visibility of housing issues facing the County's farmworker population and to share housing resources,	The establishment of a Farmworker Advisory Committee is a one-year pilot project, with a re-evaluation at the end of the year to assess its effectiveness. Staff will provide information to

Actions	Objective and Timeframe
such as fair housing service providers, the County's rehabilitation program, and code enforcement reporting. The committee would provide a forum for sharing information, resources, and gathering feedback on opportunities for improvement.	the committee as needed.
Action 4-2g: Work with agricultural businesses to provide housing resources to their employees.	Conduct outreach to agricultural businesses within the County to disseminate housing resources to farmworker employees by December 2026.
Implements the Following Policies	4A, 4G
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenues

Program 4-3 Homelessness

The County coordinates with cities, regional agencies, service providers, and the Stanislaus Community System of Care (CSOC, the local Continuum of Care), to address homelessness. The County will continue to coordinate with these agencies and service providers to implement the Regional Homeless Strategic Plan, while implementing policy solutions aimed at increasing availability of emergency shelters, transitional housing, and other housing types for people experiencing and transitioning out of homelessness.

Actions	Objective and Timeframe
Action 4-3a: When shown to be locally effective, promote home-sharing programs to connect homeowners with tenants and create income and housing opportunities for lower-income households, seniors, and persons with disabilities.	Provide information on home-sharing programs on the County's website and ensure service providers are connecting clients with home-sharing programs as appropriate.
Action 4-3b: Continue to support the Stanislaus Community System of Care (CSOC) in its efforts to coordinate with low-income housing producers and advocates, social service providers, representatives of public agencies, and other interested organizations in the implementation of the Regional Homeless Strategic Plan for Stanislaus.	Regularly participate in CSOC meetings and their related sub-committees to assist with providing technical support as needed.
Action 4-3c: Assess the County's capacity to accommodate individuals experiencing homelessness in unincorporated areas by comparing the most recent homeless point-in-time count to the number of shelter beds available countywide on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing. If capacity is not sufficient, amend the Zoning Ordinance as necessary to continue to meet the County's unincorporated area need.	Biennially with release of the Point-In-Time count. If determined to be necessary, adopt Zoning Ordinance amendments within six months of publishing the Point-In-Time Count.
Action 4-3d: Utilize federal and state funds, as available, to support homeless service providers that operate emergency shelters, and transitional, and supportive housing programs for the homeless and those who are at-risk of becoming homeless. Prioritize assistance in Empire, where the majority of homeless individuals in the unincorporated County require resources.	On an annual basis, as part of the funding allocation processes, fund programs for homeless individuals and families and those at risk of becoming homeless, subject to available funding.
Action 4-3e: Amend the Zoning Ordinance to remove the 10 bed per zone limit and increase the size limit for emergency shelters to at least 20 beds per facility, pursuant to State law. Pursuant to AB 139, reduce the off-street parking requirements for emergency shelters to	Amend Zoning Ordinance by December 2025.

Actions	Objective and Timeframe
accommodate only sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.	
Action 4-3f: Amend the Zoning Ordinance to establish a process for allowing Permanent Supportive Housing in multifamily development by-right through a staff-level permit.	Amend Zoning Ordinance by December 2025.
Implements the Following Policies	4D, 4E
Responsible Agency	County Planning & Community Development County Community Services Agency County Behavioral Health and Recovery Services
Funding Sources	Federal and State Funding Department Revenue

Program 4-4 Community Outreach and Education

Community outreach is a key component to developing a comprehensive and inclusive housing market in the County. It is critical to engage local community groups and stakeholders from all sectors of the community to educate and provide inclusive housing opportunities and to understand housing needs. The goal of this program is to provide community groups that are affected by restrictions to fair and equitable housing greater opportunities for becoming informed and engaged in the County's housing and overall planning process.

Actions	Objective and Timeframe
Action 4-4a: Work with community groups and service providers to increase accessibility to public workshops by identifying suitable times, preferred meeting types (in person, virtual, or hybrid meetings), having meetings be accessible to persons with disabilities, and having meetings be accessible to nearby transit centers. (Environmental Justice)	Ongoing on a case-by-case basis.
Action 4-4b: Maintain a list of neighborhood groups and other community organizations that advocate for protected housing groups including seniors, individuals with disabilities, large households, multi-generational households, and other groups, and disseminate information about housing opportunities and participate in community meetings as requested.	Develop list by December 2025 and update contact information annually. Disseminate information on an ongoing basis as opportunities become available.
Action 4-4c: Develop a countywide language access policy to ensure residents with limited English proficiency have accessible information. (Environmental Justice)	Implement policy by December 2025.
Action 4-4d: Develop an outreach strategy building upon the Housing Stanislaus initiative for housing programs and community planning activities in an effort to increase participation. Collaborate with existing and new community stakeholders from all sectors and geographic areas to engage in the public participation process. Review the strategy annually to ensure all appropriate populations are reached. (Environmental Justice)	Develop an outreach strategy building upon the Housing Stanislaus initiative by December 2026 and review on an annual basis. Target outreach to communities with negative CalEnviroScreen scores and R/ECAPs. All outreach materials will be distributed in English and Spanish.
Implements the Following Policies	4D
Responsible Agency	County Planning & Community Development Chief Executive Office

Actions	Objective and Timeframe
Funding Sources	Federal and State Funding Department Revenues

Goal 5: Ensure fair and equal housing opportunities.

Policies

5A **Fair Housing Services:** The County shall support services and programs that work to eliminate housing discrimination and ensure that residents are aware of their rights and responsibilities regarding fair housing.

5B **Housing Discrimination:** The County shall support efforts within its control to prevent discrimination in the sale or rental of housing with regard to race, ethnic background, religion, disability, income, sex, age, and household composition.

5C **Fair Housing Outreach:** The County shall continue to conduct fair housing outreach and education for unincorporated residents, property owners, and housing providers to ensure each understands their rights and responsibilities.

5D **Rental Assistance:** The County shall continue to support rental assistance for lower-income households who have fallen behind on rent and need assistance on regaining or gaining housing stability.

5E **Fair Chance Housing:** The County shall refer individuals with poor credit history, poor landlord referral/references, formerly incarcerated, or other mitigating circumstances to service providers who can assist them with housing opportunities.

Programs

Program 5-1 Affirmatively Furthering Fair Housing & Environmental Justice

AB 686 (2017, Santiago) requires each local government to administer its programs and activities related to housing in a manner that affirmatively furthers fair housing. The County will take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities. Chapter 3, *Affirmatively Furthering Fair Housing (AFFH)*, summarizes the fair housing issues and concerns in Stanislaus County based on findings of the 2020-2025 Stanislaus County Regional Analysis of Impediments to Fair Housing Choice (AI) and additional research conducted as part of this Housing Element update. Programs under this goal are designed to affirmatively reduce barriers to housing and increase equitable conditions across neighborhoods, addressing issues such as historic and existing racial and economic inequities, housing mobility and access, community investment and engagement, and environmental health. The findings of the AFFH analysis were used to develop meaningful actions and metrics and milestones that promote inclusive communities, increase housing opportunities, and address racial/ethnic and economic disparities in the unincorporated County.

Actions	Objectives and Timeframe
Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit	Review policies and procedures for community development and housing assistance programs by December 2026 and make necessary changes within six months.

Actions	Objectives and Timeframe
organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.	
Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of "Outstanding" and may exclude those with a rating of "Needs to Improve" or "Substantial Noncompliance" according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). Review an individual institution's most recent Home Mortgage Disclosure Act (HMDA) reporting as most recently published by the Federal Financial Institutions Examination Council (FFIEC).	Ongoing, during each funding cycle.
Action 5-1c: Assess the feasibility of allowing a variety of home-based economic opportunities in residential neighborhoods, e.g., micro-kitchens, day cares, and home occupations.	For those actions determined to be feasible, establish a plan to amend County Code by January 2026. Within six months of amendment, promote the opportunities created by amendments in Lower Resource areas, R/ECAPs, and areas of concentrated poverty such as Airport, Rouse/Colorado, and Bret Harte.
Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities.	Seek funding annually as applicable NOFAs become available. If funding is secured, within six months of grant award, issue an RFP for conceptual planning services. Focus efforts in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (i.e., Airport, Rouse/Colorado, and Bret Harte).
Action 5-1e: Modify the County's program guidelines according to funding regulations, if necessary, to allow the use of eligible State and/or federal funding to repair failing septic systems.	Modify funding policies by June 2026.
Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6th cycle Housing Element planning period.	Apply for Prohousing designation by June 2026.
Action 5-1g: Offer training to County staff on a variety of topics included in the County's Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)	Beginning 2026, offer training sessions annually during the planning period.
Action 5-1h: Update the Safety Element to comply with State Environmental Justice requirements and Housing Element Update regulations.	Complete the Safety Element Update by December 2026, and implement programs as specified in the element, reviewing progress annually with the Annual Progress Report.
Action 5-1i: Advertise existing workforce training classes offered through Stanislaus County Workforce Development to provide economic mobility, who partners with the local employment organizations to connect residents with job opportunities and workforce training program opportunities.	Continue to offer workforce development programs through the Stanislaus County Workforce Development and host an annual job fair in Lower Resource areas, R/ECAPs, and areas of concentrated poverty (i.e., Airport, Rouse/Colorado, and Bret Harte).
Action 5-1j: To enhance access in R/ECAP and lower-income areas, the County will continue to promote walkability and active transportation in compliance with the goals outlined in the Circulation Element. (Environmental Justice)	On an ongoing basis, Public Works will continue to apply for grant funding, such as Active Transportation Program (ATP) funding, to improve multi-modal infrastructure, including sidewalks, in Low Resource areas of the County. Collaborate with StanRTA to expand and

Actions	Objectives and Timeframe
	improve transit routes that connect low-income neighborhoods with employment centers, schools, and other essential services. Aim to complete at least two transit improvement projects detailed in the CIP (see Action 5-3e), including the Bret Harte and Rouse/Colorado sidewalk projects, during the planning period.
Action 5-1k: Support economic development efforts to promote housing mobility through consultation with local economic-focused organizations.	Meet annually with Workforce Development, Opportunity Stanislaus, Chambers of Commerce, and industry groups to engage local employers to identify entry-level positions with good pay that can be advertised to lower-income tenants.
Action 5-1l: Continue to develop the Crows Landing Industrial Business Park to create living wage jobs where people live.	Continue to implement the Crows Landing Business Park Specific Plan. Complete infrastructure improvements included in Phase 1A by the end of the planning period.
Implements the Following Policies	5A, 5B
Responsible Agency	County Planning & Community Development Community Services Agency Chief Executive Office County Behavioral health and Recovery Services
Funding Sources	Federal and State Funding Department Revenues

Program 5-2 Fair Housing Services

The County contracts annually with a fair housing and tenant/landlord services provider as part of its CDBG program. The primary objective of the program is to build awareness of housing laws, tenants' rights, and prevent evictions.

Actions	Objective and Timeframe
Action 5-2a: Coordinate with qualified organizations to provide fair housing and tenant/landlord services, including housing counseling and education and tenant/landlord counseling and mediation. Provide written information and workshops in multiple languages. Ensure outreach to identified Disadvantaged Communities, specifically Cowan Tract, Crows Landing, Grayson, Keyes, Monterey Park Tract, Riverdale Park Tract, and Westley[1]. (Environmental Justice)	Maintain fair housing provider contract and aim to provide at least 90 percent of services in Disadvantaged Communities.
Action 5-2b: Through a fair housing provider, provide information and referral services that direct families and individuals to financial resources for housing rental or purchase, locating suitable housing, and obtaining housing with special needs facilities such as accessible units.	Hold at least eight informational events during the planning period to disseminate informational materials or provide trainings to residents, at least once every two years in communities sensitive to displacement (see Chapter 3, Affirmatively Furthering Fair Housing, Section 3.7.3).
Action 5-2c: Provide training opportunities for property owners and managers about the requirements of federal, state, and local laws	Partnering with a fair housing provider, hold two training sessions annually.

[1] Stanislaus County Disadvantaged Unincorporated Communities Report. https://www.stancounty.com/planning/pl/documents/gp/i-d-stanislaus-county-disadvantaged-unin-communities-report.pdf

Actions	Objective and Timeframe
related to real estate, housing discrimination, tenant protection, and housing inspection. Work cooperatively with the real estate industry to develop ways for agents and property managers to become more familiar with County housing and rental and utility assistance programs. Encourage realtors to seek fair housing training.	
Action 5-2d: Require contracted fair housing provider to conduct random fair housing testing at least annually.	Annual testing.
Action 5-2e: Disseminate fair housing information via targeted social media efforts.	Add more information about fair housing agencies and services on the County's webpage and social media by December 2025.
Implements the Following Policies	5A, 5B, 5C, 5C
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 5-3 Displacement Prevention, Place-Based Strategies, and Housing Mobility

The County includes actions to address displacement risk, housing mobility, and place-based strategies toward community revitalization. These place-based strategies are intended to address broader community development issues such as parks, neighborhood revitalization, community facilities, and inter-modal transportation.

Actions	Objective and Timeframe
Action 5-3a: Partner with fair housing organizations to ensure dissemination about the California Tenant Protection Act of 2019 (AB 1482). Develop print and online educational materials and make materials available at County facilities and on the County's website including social media.	Make materials available at County facilities and on the County's website by December 2025.
Action 5-3b: Explore opportunities to expand funding to increase capacity of fair housing providers to expand tenant mediation services.	If funding sources are identified and determined feasible, work with fair housing providers to actively seek new funding or reallocate existing funding for expanded services by June 2026.
Action 5-3c: Incorporate near-term infrastructure projects detailed in the South 9th Street Corridor Plan into the County's Capital Improvement Project list. The South 9th Street Corridor Plan is intended to guide public improvements, private development, and economic growth within the corridor and surrounding South 9th Street area and aims to promote safety, enhance connectivity and land use compatibility. Projects are organized into the following categories: roadway and green infrastructure, bicycle and pedestrian facilities, and intersection treatments.	Complete the near-term 9th Street Pavement Rehabilitation project by December 2026. Add other near-term projects to the Capital Improvement Plan project list by 2026. See Appendix G of the Corridor Plan for a complete list of projects[2]. Complete at least two infrastructure projects by 2031.
Action 5-3d: Prioritize the improvement of existing parks and other community spaces by adequately maintaining and improving existing facilities and amenities (lighting, playground equipment, pools, community centers etc.) and provide new amenities where feasible in Disadvantaged Unincorporated Communities, specifically Grayson, Keyes, and Crows Landing. Explore grant funding opportunities for	Apply for and secure grant funding for the enhancement of the Leroy Fitzsimmons Playground in Grayson, including replacement of the playground equipment, adding play surfacing and ADA improvements, by December 2026. Complete the interior and

[2] South 9th Street Corridor Plan. 2025. https://www.stancounty.com/bos/agenda/2025/20250114/DIS01.pdf

Actions	Objective and Timeframe
park enhancements. (Environmental Justice)	exterior renovation and remodel of the Keyes Community Center and Library by July 2026. Renovate the Bonita Pool in Crows Landing, including restrooms, a concession stand, picnic area, and ADA improvements, by December 2026. Complete at least three park improvement projects by 2031.
Action 5-3e: Partner with StanRTA to improve access to public transit routes that connect low resource residential neighborhoods to jobs and shopping centers as well as to emergency services, such as hospitals and resilience centers (established to shelter persons during extreme weather or other emergency events). Provide StanRTA with community input received on public transit route needs and aid in educating the public on available public transportation services, including fixed routes, flexible services (Dial-A-Ride, shuttle, and medivan services), ADA Paratransit services, and the availability of reduced fares for seniors (age 65 and older), persons with disabilities, and veterans. Partner with StanRTA on seeking funding to address any gaps in access to public transit. (Environmental Justice)	Establish a partnership with StanRTA and provide any community input received to allow StanRTA to update service needs assessment by December 2026. Provide information on available public transit services, and support and work with StanRTA's efforts to secure grant funding by June 2026.
Action 5-3f: Implement placed-based improvements with a focus on upgrading infrastructure in communities with high displacement risk, including the Bret Harte and Riverdale Park Tract (South Modesto), Bystrom (North Ceres), Crows Landing, Empire, Herndon (South Ceres), Kenwood/Starr (Turlock), Robertson Road, Rouse/Colorado, and Spencer/Marshall (West Modesto), and neighborhoods. Specific projects are listed below: **Bret Harte and Riverdale Park Tract (South Modesto):** • Bret Harte Infrastructure Project: Design and construction of storm drain facilities (including curb, gutters), sidewalk (including ADA ramps and misc. driveway approaches), street light facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Fall 2025. • Riverdale Park Tract Infrastructure Project: design and construction of storm drain facilities (including curb, gutters), sidewalk (including ADA ramps and misc. driveway approaches), domestic water facilities, street light facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Summer 2026. **Bystrom (North Ceres):** • Ninth Street Pavement Rehabilitation Project - Tuolumne River Bridge and Pecos Avenue: Design and construct pavement rehabilitation, new bike lane striping, ADA ramps, and traffic signal modifications. Estimated completion date: Spring 2026. • Bystrom Neighborhood Pedestrian Sidewalk Project: Design and construction of storm drain facilities, roadway striping, roadside signs, sidewalk improvements (ADA ramps and miscellaneous driveway approaches). Estimated completion date: 2029. **Crows Landing:** • Bonita Pool: Renovate the Bonita Pool in Crows Landing, including restrooms, concession stand, and ADA improvements, by December 2026. **Empire:**	Objectives and timeframes for improvement projects are based on the Capital Improvement Plan for Fiscal Years 2025-2029.

Actions	Objective and Timeframe
• Empire Storm Drain Trunk Line Project: Design and construction of a storm drain trunk line for the town of Empire to the river. Estimated completion date: 2029. **Herndon (South Ceres):** • Herndon Infrastructure Project: Design and construction of storm drain facilities (including curb, gutters), sidewalk (including ADA ramps and misc. driveway approaches), domestic water facilities, street light facilities, sanitary sewer facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Fall 2025. **Kenwood/Starr (Turlock):** • Kenwood-Starr Infrastructure Project: Design and construction of storm drain facilities (including curbs and gutters), sidewalk (including ADA ramps and misc. driveway approaches), domestic water facilities, street light facilities, sanitary sewer facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Fall 2025. **Robertson Road, Rouse/Colorado, and Spencer/Marshall (West Modesto):** • Robertson Road Elementary Safe Crossing and Active Transportation Project: Install sidewalk along Robertson Road from Carpenter Road to Hays Street. Estimated completion date: Fall 2025. • West Modesto Sewer Infrastructure Projects: Installation of public sewer systems in Spencer/Marshall, Rouse/Colorado, and Beverly/Waverly neighborhoods. Estimated completion date: 2031. • Rouse/Colorado Infrastructure Project: Design and construction of storm drain facilities (including curbs and gutters), sidewalk (including ADA ramps and miscellaneous driveway approaches), domestic water facilities, street light facilities, sanitary sewer facilities, roadside signs, and roadway reconstruction (including striping). Estimated completion date: Summer 2026.	
Action 5-3f: Develop an Affirmative Fair Housing Marketing Plan checklist, which provides parameters on populations to be served by project type, for County-sponsored affordable housing developments located in the unincorporated area that targets multilingual outreach, culturally relevant media, and partnerships with local community organizations, in full compliance with HUD regulations (24 CFR Section 92.351) to ensure equitable access to housing opportunities for groups least likely to apply.	Develop checklist by end of 2026 and amend the plan as needed if additional local findings are made that would affirmatively further fair housing. Require all County-sponsored developments in the unincorporated area to utilize the plan by the County's next Notice of Funding Availability of 2027.
Action 5-3g: Designate a County staff member to act as a small business advocate to serve as a single point of contact for local businesses and interface with relevant departments to support business owners in obtaining permits, grants, and other technical support, with a focus on entrepreneurship in lower-income neighborhoods, such as Airport, Rouse/Colorado, and Bret Harte. Market the program to Municipal Advisory Committees and community-based organizations.	Disseminate outreach materials by the end of 2026. Assist 20 business owners throughout the planning period.
Action 5-3h: Prepare and establish a comprehensive Anti-Displacement Strategy to address pressures of rising housing costs and income inequality in communities with higher displacement risk (i.e., Rouse/Colorado, Bret Harte, and Airport). The anti-displacement	Conduct the following schedule of actions: • In 2026, conduct an evaluation of existing renter/tenant protections and anti-displacement measures and fair housing

Actions	Objective and Timeframe
strategy will include, but is not limited to the following: • Development of an engagement strategy addressing: ▪ Engagement with fair housing service providers to improve upon and expand the dissemination of information on tenant protection and available fair housing resources. ▪ Engagement with developers to build affordable housing developer capacity, including technical assistance on available sites, funding opportunities, and local fee waiver opportunities. ▪ Engagement with communities at a high-risk of displacement (i.e. Rouse/Colorado, Riverdale Park Tract, Bret Harte, Bystrom, Airport, Empire, and Crows Landing) to solicit community input and feedback regarding anti-displacement measures. • An evaluation and feasibility assessment of renter/tenant protections and anti-displacement measures implemented by other similar jurisdictions to prevent displacement in vulnerable communities, including but not limited to: ▪ Rental assistance and foreclosure prevention assistance. ▪ Development of a Tenant and Community Opportunity to Purchase Act program, inclusive of a technical assistance program to help establish and grow tenant associations. ▪ Development of a rental inspection and rental registry program aimed at protecting tenants in R/ECAP areas from evictions. ▪ Development of local preference policies, targeting neighborhoods with a high-risk of displacement • A funding strategy that inventories existing funding sources and potential funding sources that could be utilized to implement strategies.	service programs, including funding sources being utilized. Provide the results of the evaluation to the General Plan Update Committee by April, 2027. • In 2026, prepare an engagement strategy for fair housing service providers. Implement the strategy into existing community development and housing efforts by April 2027. • In 2026, prepare an engagement strategy to build affordable housing developer capacity. Implement the strategy by April 2007. • In 2026, prepare an engagement strategy for communities at high-risk of displacement. Implement the strategy by April 2027. • In 2027, develop program options for the anti-displacement measures targeting R/ECAP areas and present program options, including funding options, to the General Plan Update Committee (GPUC) by April, 2028. • In 2027, based upon feedback from the GPUC and other relevant bodies and stakeholders, establish a comprehensive Anti-Displacement Strategy.
Action 5-3i: Coordinate with South Modesto Business United to work through any business displacement issues associated with the added residential density along Crows Landing Road.	Coordinate with South Modesto Business United on a project-by-project basis and maintain an open dialogue throughout the planning period.
Implements the Following Policies	5A, 5B, 5C, 5E
Responsible Agency	County Planning & Community Development County Department of Public Works County Parks and Recreation County Health Services Agency County Office of Emergency Services County General Services Agency
Funding Sources	Federal and State funding County Public Facility Fees Grant Funding

6.1 Summary of Quantified Objectives

The County's quantified objectives for the 2023-2031 planning period are as follows:

- Sites to facilitate new housing units, including the County's RHNA of 287 extremely low-income units, 287 very low-income units, 398 low-income units, 458 moderate-income units, and 1,045 above moderate-income units
- New development of 100 lower-income units, 100 moderate-income units, and 100 above moderate-income units. This would exceed the County's 5th Cycle development trends.
- Infill development of 84 lower-income units, 83 moderate-income units, and 83 above moderate-income units. This would exceed the County's current 6th Cycle development trends.
- Rehabilitation of 32 affordable units
- Construction of 184 ADUs
- There are currently no at-risk housing units in unincorporated Stanislaus County

Table 6-1 summarizes these objectives for the 2023-2031 planning period by income category.

Table 6-1 Quantified Housing Objectives (2023-2031)

	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
RHNA	287	287	398	458	1,045	2,475
New Development	33	33	34	100	200	400
Infill Development	28	28	28	83	83	250
Units To Be Rehabilitated	10	10	12	0	0	32
ADUs	0	0	0	0	184	184
At-Risk Housing Units to be Preserved	0	0	0	0	0	0

Note: Government Code Section 65583 mandates that localities calculate the subset of the very low-income regional need that constitutes the communities need for extremely low-income housing. As an alternative to calculating the subset, local jurisdictions may assume that 50 percent of the very low-income category is represented by households of extremely low income (less than 30 percent of the median family income).

From: Kristin Doud
To: Perfecto Munoz
Subject: RE: 6th Cycle housing element implenentation
Date: Thursday, September 18, 2025 11:23:00 AM

I think you are thinking about the Environmental Justice Sub-Committee. That sub-committee is being retooled. I will let you know when we have it figured out.

From: Perfecto Munoz <ppmunoz63@westmodestocollaborative.com>
Sent: Thursday, September 18, 2025 11:17 AM
To: Kristin Doud <Doudk@stancounty.com>
Subject: 6th Cycle housing element implenentation

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Hi Kristy in finally finish reading the 6th Cycle Housing Element Implementation document. You mention that I will be notified to participate on this housing committee. Let know if there will be any housing meetings in the near future.

Perfecto

Perfecto Munoz, MA, PhD, MPH
Chief Executive Officer
West Modesto Community Collaborative
601 Martin Luther King Dr
Modesto, California 95351
Ppmunoz63@westmodestocollaborative.com
209-522-6902 Main Office
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From:	Vanessa Castro
To:	Planning
Subject:	General Plan Amendment, Rezon, and Ord. Amendment No. PLN2025-0053 - Stanislaus County"s 6th Cycle Housing Element Implementation
Date:	Monday, September 29, 2025 4:11:21 PM
Attachments:	image001.png

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To whom it may concern,

City of Modesto staff have reviewed the proposed changes to the Stanislaus County 6th Cycle Housing Element Update and has no comments at this time.

Best,

City of Modesto Logo

Vanessa Castro,
Senior Planner
Community & Economic Development,
Planning Division
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1010 10th St., Modesto, CA 95354

California Rural Legal Assistance, Inc.
Rural Roots, Justice for All

Stanislaus County
Planning and Community Development Department
1010 10th St. Suite 3400
Modesto, CA 95354

September 25, 2025

Submitted via electronic mail to: planning@stancounty.com

Re: Comments on the County of Stanislaus 6th Cycle Housing Element – Draft 4.5

Ms. Freitas & Ms. Doud:

California Rural Legal Assistance, Inc. ("CRLA") submits these comments on Stanislaus County's 4.5th Draft 6th Cycle Draft Housing Element (Draft 4.5). We acknowledge and appreciate the additions and improvements the County has made in Draft 4.5 and the County's openness to ongoing dialogue with CRLA regarding our concerns. We submit these comments to highlight the need for additional revisions. These revisions must be made in order for the County to achieve substantial compliance with all aspects of Housing Element law, including its duty to affirmatively further fair housing (AFFH), and other related laws and policies.[1]

I. To comply with its obligations under Fair Housing Law, the County must rezone any additional sites that are possible to rezone and have sufficient available infrastructure access in the County's high and highest resource areas.

Cal. Gov. Code section 8899.50 obligates the County to Affirmatively Further Fair Housing (AFFH). The duty to AFFH means that public entities must take *affirmative steps* to end segregation and create integrated communities of opportunity. The County must also comply with other fair housing laws including the federal Fair Housing Act, California's Fair Employment and Housing Act, and California Government Code section 65008. Among the County's duties under these laws is the duty to avoid taking actions or creating housing policies that result in a discriminatory or segregative effect.

As we have expressed in previous comments, the County's current Sites Inventory disproportionately sites a significant majority (81%) of its low- and very low-income housing in the County's Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) and areas of high segregation and poverty. **The concentration of low and very low-income housing units is**

[1] Cal. Gov. Code Sections 8899.50; 65583(c)(5),(10).

highest in the R/ECAP of Bret Harte, which alone received 45.7% of the County's total low and very low-income housing unit allocation in five heavily concentrated parcels on the outer edge of the neighborhood. At the same time, **most of the County's Racially Concentrated Areas of Affluence (RCAAs) and high and highest resource areas received no low- or very low-income allocation.** The overall impact of this distribution will be the exacerbation of the County's existing patterns of segregation. The current Sites Inventory thus violates the County's duty to affirmatively further fair housing, rendering the Housing Element noncompliant with state and federal fair housing law.

Additional Rezone Sites Analysis

Since we submitted our last comments, we have appreciated the County's willingness to meet with us to discuss possible changes and improvements to the Sites Inventory and share the data used to prepare it. Using the data the County provided, we have identified several sites in high resource areas of the County that we believe could be rezoned to accommodate a larger percentage of low and very low-income housing units. **In particular, we recommend rezoning certain sites in Denair and reallocating low-income units from Bret Harte to Denair to enable a better mix of housing types in both communities and provide a less segregative alternative to the County's current Sites Inventory.**

A. Bret Harte contains a disproportionate allocation of low and very low income sites that must be redistributed in order to affirmatively further fair housing.

In the Sites Inventory, five sites located in a single 24-acre block (Fairview Park) in the far western extremity of the community of Bret Harte have received an allocation of 45.6%, nearly half, of the total low- and very low-income units in the County.

Table 1: Sites in Bret Harte (Fairview Park)

Address	APN	Acres	VLI	LI	MI	AMI	Total
Tucson Ave & Plumas Ave	056-032-069	4.32	46	33	7	0	86
Tucson Ave & Modoc Ave	056-033-049	7.12	76	54	12	0	142
Lassen & Marin Ave	056-034-001	5.1	54	39	9	0	102
Lassen & Inyo Ave	056-035-001	5.55	60	42	9	0	111
Yuma & Tucson Ave	056-036-036	2.28	24	17	4	0	45
Total			260	185	41	0	**486**

Given Bret Harte's status as a R/ECAP area, an area of high segregation and poverty, and an area without adequate resources, this allocation of such a significant percentage of the

County's low and very low income units is a violation of the duty to affirmatively further fair housing. For this reason, we focused our analysis of potential rezone sites on finding a way to reduce the distribution of low and very low income units to this set of sites and reallocate the units to sites in high or highest resource areas and/or RCAAs.

B. Sites exist within the RCAA and high resource area of Denair that could be rezoned to accommodate additional very low-, low-, and moderate-income housing.

The next step in our analysis was to identify potential additional sites for that could be rezoned in RCAAs and high or highest resource areas to take on additional very low-, low-, and moderate-income housing unit allocations. To accomplish this, we took into account the following criteria, based on conversations with the County and factors identified and explained in the Housing Element:

- Resource level (TCAC designation, RCAA/R/ECAP status)
- Infrastructure availability (water and wastewater)
- Parcel size (over .5 acres, under 10 acres)
- Status of planned development. Based on information available in Draft 4.5,[2] we excluded the following planned and approved project sites from our proposed rezone list:
    - Elmwood Estates 024-055-060
    - Isaaco Estates 024-025-002, -014, -052, and -053
    - Hoffman Ranch Subdivision 024-012-027
    - Lazares Subdivision 024-012-009
- Parcel utilization. Rather than propose the rezoning of parcels that have already been allocated for multiple income levels, we included in this proposal only sites that are currently designated solely for above moderate income units. Within Denair, there are other sites that include both above moderate and moderate income units that may also be worth considering for rezone potential.

Based on these factors, we identified the sites in Table 2 as having the potential to be rezoned to allow very low, low, and moderate income housing in addition to above moderate income housing. All sites identified for possible rezoning were located in Denair, due primarily to constraints regarding water and/or wastewater infrastructure availability.

[2] Draft 4.5 at 5-4 (PDF 307).

Table 2: Additional Proposed Rezone Sites in Denair

Community	Address	APN	Acres	VLI	LI	MI	AMI	Total
Denair	3252 Story Rd	024-053-041	3.62	0	0	0	12	12
Denair	4109 Sperry Rd	024-015-010	1.67	0	0	0	4	4
Denair	4140 N Santa Fe Ave	024-015-028	1.76	0	0	0	5	5
Denair	4216 Sperry Rd	024-016-004	2.99	0	0	0	9	9
Denair	4308 Sperry Rd	024-016-009	1.69	0	0	0	5	5
Denair	4100 Sperry Rd	024-017-003	2	0	0	0	6	6
Denair	3640 Gratton Rd	024-024-016	2.1	0	0	0	6	6
Denair	0 Derr Rd	024-050-026	1.53	0	0	0	5	5
Denair	4141 Sperry Rd	024-014-007	0.96	0	0	0	2	2
Denair	3225 Story Rd	024-025-004	1.8	0	0	0	4	4

C. The Sites Inventory includes sites that utilize a replicable framework for including very low-, low-, moderate-, and above moderate-income units within the same parcel.

The next step in our analysis was to determine how the potential rezone sites, if rezoned, could then be more efficiently utilized to accommodate multiple income level units within each site. To accomplish this, we looked to the Sites Inventory for possible distribution schemes the County has already considered in other sites marked for rezoning. Table 2 highlights sites already proposed for rezoning that are intended to accommodate an allocation of very low, low, moderate, and/or above moderate-income units together within a single project.

Table 3: Model for Distribution of Units at Multiple Income Levels Units Within a Single Parcel

Community	Address	APN	Acres	VLI	LI	MI	AMI
Denair	3833 Lester Rd	024-012-004	4.52	24	17	4	12
Denair	3817 Lester Rd	024-012-005	4.94	27	18	4	13
Denair	3325 Kern St	024-033-002	1.84	16	10	3	0

D. Under the distribution framework used by the Sites shown in Table 3, sites in Denair can be rezoned to accommodate additional low and very low-income units, allowing for a more equitable distribution of sites to both Bret Harte and to Denair and yielding a less segregative alternative to the current Sites Inventory.

Based on the distributions of units used for the sites included in Table 3, rezoning the Denair sites in Table 2 to accommodate higher density housing units would make it possible to reallocate the units between Bret Harte and Denair in the manner described in Table 4 below.

Table 4: Proposed Reallocation of Units between Bret Harte and Denair

Bret Harte Sites (Proposed)

Address	APN	Acres	VLI	LI	MI	AMI	Total
Tucson Ave & Plumas Ave	056-032-069	4.32	20	14	5	10	49
Tucson Ave & Modoc Ave	056-033-049	7.12	32	22	8	16	78
Lassen & Marin Ave	056-034-001	5.1	23	16	6	11	56
Lassen & Inyo Ave	056-035-001	5.55	26	17	6	13	62
Yuma & Tucson Ave	056-036-036	2.28	10	7	2	5	24
Total			111	76	27	55	**269**

Denair Sites (Proposed)

Address	APN	Acres	VLI	LI	MI	AMI	Total
3252 Story Rd	024-053-041	3.62	35	25	7	0	67
4109 Sperry Rd	024-015-010	1.67	16	12	3	0	31
4140 N Santa Fe Ave	024-015-028	1.76	17	12	3	0	32
4216 Sperry Rd	024-016-004	2.99	29	21	6	0	56
4308 Sperry Rd	024-016-009	1.69	16	12	3	0	31
4100 Sperry Rd	024-017-003	2	19	14	4	0	37
3640 Gratton Rd	024-024-016	2.1	19	14	4	0	37
0 Derr Rd	024-050-026	1.53	13	8	3	0	24
4141 Sperry Rd	024-014-007	0.96	9	5	2	0	16
3225 Story Rd	024-025-004	1.8	17	12	3	0	32
Total			190	135	38	0	**363**

The reallocation of units detailed in Table 4 would improve upon the current Sites Inventory in three key respects:

- **This reallocation would allow for a higher overall capacity to accommodate housing units in the county**. The total number of above moderate-income units would reduce

from 58 currently allocated to Denair to 55 allocated to Bret Harte – as the Sites Inventory currently accommodates for a surplus of above-moderate income housing, this decrease of 3 above moderate-income units would not negatively impact the County's ability to meet the RHNA. Meanwhile, the total number of very low-, low-, and moderate-income units accommodated by the Sites Inventory would rise by 41, 26, and 52 units respectively.

- **This reallocation would reduce the levels of segregation in both Bret Harte and Denair by more equitably distributing units at each income level.** Denair, which is already high resource and much of which has the status of a RCAA, would receive a more significant number of very low-, low-, and moderate-income housing. Correspondingly, Bret Harte would receive a less concentrated allocation of very low- and low-income housing while receiving a better mix of all housing types.
- **In reducing the levels of segregation in R/ECAP and RCAA areas of the County, this distribution would be more compliant with statutory requirements under Fair Housing and Housing Element law, including the duty to affirmatively further fair housing.**

Under the duty to Affirmatively Further Fair Housing and related fair housing laws, the County must adopt the least segregative feasible version of the Sites Inventory. To the extent the proposed redistribution, or some version of it, provides a less segregative feasible unit allocation, the County must update its Sites Inventory accordingly.

We acknowledge that in order to adopt the proposed rezoning scheme, the County must conduct additional analysis of factors pertaining to these sites that may not have been included in the housing element or data provided to us. We affirm our commitment to continuing to work with the County to determine the feasibility of this less segregative alternative and look forward to continuing conversations to this end.

II. The Housing Plan must be further revised to ensure that it complies with Housing Element law and Affirmatively Furthers Fair Housing.

Under Housing Element law, the County is required to create a program setting strategies and actions, each beholden to their own implementation timeline, that will result in "beneficial impacts" within the planning period.[3] In order to affirmatively further fair housing, this program must reflect the most urgent identified fair housing issues (contributing factors) through

[3] Cal. Gov. Code section 68853(c)

strategies and actions including place-based community revitalization and protecting existing residents from displacement.[4]

We commend the County for making significant positive changes and additions to the Housing Plan in Draft 4.5 of the Housing Element. The new language and actions in Draft 4.5 are steps in the direction of ensuring that the Housing Element will effectively affirmatively further fair housing and support County residents facing the most severe housing insecurity and housing burdens. To ensure that beneficial impacts from these programs occur during the planning period, however, additional revisions are needed. We offer the following recommendations and edits to ensure that the Housing Plan will comply with Housing Element law and yield tangible benefits for residents in need.

A. Programs 2-1i. The County must commit to taking specific action to prioritize providing technical assistance to affordable housing developers interested in developing housing for extremely low-income households.

Housing Element law requires the County to assist in the development of adequate housing to meet the needs of extremely low, very low, low- and moderate-income households.[5]

Action 2-1i represents a positive step toward accomplishing this goal, but the following revisions are needed to ensure that specific disadvantaged communities will benefit from affordable housing development within the planning period.

> **Action 2-1i:** Provide technical assistance to prospective developers interested in developing housing for extremely low-income (ELI) households. Defer Public Facility Fees for housing developments providing ELI housing. ~~Advocate for providing prioritization in RFP scoring for~~ Develop and advocate for an update to RFP scoring criteria to prioritize technical assistance for affordable housing developments providing 50 percent or more ELI housing units.
>
> Hold at least two meetings for developers interested in affordable housing for ELI households to provide technical assistance. Hold meetings in and regarding neighborhoods with higher concentrations of ELI households (i.e., Rouse/Colorado, Bret Harte, and Airport). Defer the PFF fees for two housing developments providing 50 percent or more ELI units. Recommend a scoring preference for ELI priority to the Community Development Committee by 2026.

[4] Id. at (c)(10)(a)(iv), (v)
[5] Cal. Gov. Code section 65583(c)(2)(A)

B. Action 3-6k. The County must incorporate public input and feedback into its zoning ordinance assessment strategy to ensure that innovative and unconventional housing types in areas with high homelessness reflect local priorities and needs.

Action 3-6k, which commits the County to assessing its Zoning Ordinance to consider the possibility of making amendments to permit the development of housing such as tiny home villages and cottage housing in order to combat homelessness, has the potential to yield significant benefits for extremely low-income and unhoused individuals in the County. In order to ensure that this potential is realized, the County must commit to taking specific actions toward this goal and engaging with members of the public in heavily impacted communities to ensure that policy changes reflect community needs and priorities. We recommend the following revisions.

> **Action 3-6k:** Assess and amend the County's Zoning Ordinance~~, and amend as needed,~~ to permit the development of innovative or unconventional housing types, such as tiny home villages and cottage housing, to expand the County's ability to address the homelessness crisis in the unincorporated areas.
>
> - By July 2026, hold a first round of public meetings in communities with higher levels of homelessness (e.g., Empire, Keyes, West Modesto) to solicit input from residents on community-specific needs and preferences for developing innovative or unconventional housing types in their communities.
> - Assess the zoning ordinance to identify needed amendments by December 2026.
> - By April 2027, hold a second round of public meetings in the same communities to provide an update on the proposed zoning ordinance changes and seek community feedback prior to their presentation to the Planning Commission.
> - Present a recommendation to amend the County's Zoning Ordinance to the Planning Commission by July 2027, with particular focus in communities with higher levels of homelessness (e.g., Empire and Keyes).

C. Action 2-3b. The County must commit to additional community outreach to ensure that tenants in the County receive the benefits of fair housing protections during the planning period.

Draft 4.5 adds to Action 2-3b a commitment to providing tenant/landlord counseling services. This addition reflects the County's existing approach to addressing fair housing issues but does not expand or improve it. By focusing outreach on potential tenants and landlords or property managers, Action 2-3b fails to take steps to reach existing tenants that would benefit

from knowledge of their fair housing rights. We recommend the following revisions to this action to ensure that existing as well as prospective tenants are given the opportunity to learn about their legal rights on an ongoing basis throughout the planning period.

> **Action 2-3b:** Ensure potential and existing tenants and landlords or property managers are informed of the California Fair Employment and Housing Act (FEHA) prohibiting housing discrimination based on source of income (including housing choice vouchers). Provide tenant/landlord counseling services and conduct ongoing outreach to inform tenants of their fair housing rights.
>
> Require any County contracted fair housing providers to disseminate information about FEHA by December 2025. Provide tenant/landlord counseling services ~~annually~~, upon request. Work with fair housing providers and community partners to conduct outreach to tenants regarding their fair housing rights at least twice per year.

D. Action 5-3h. The County must commit to a place-based, community centered anti-displacement strategy to combat displacement risk in the County's most displacement-sensitive communities.

Housing Element law requires the County to develop strategies and actions to address identified fair housing issues, including place-based strategies and actions to protect existing residents from displacement. Although much of Stanislaus County is at a relatively low risk, several of the County's lowest resource and most highly segregated communities are considered sensitive for displacement risk, with the highest displacement risks in the communities of Bret Harte, Airport, Bystrom, and Rouse-Colorado.[6] Rouse-Colorado is the only community in the Northern San Joaquin Valley where more than one income group risks displacement.[7] Although the County has classified displacement as a low priority contributing factor,[8] the displacement experienced by residents of these specific communities is acute, indicating a strong need for place-based strategies to combat displacement risk that focuses on these communities.

The Anti-Displacement strategy included in Draft 4.5 is a strong step in the direction of meaningfully combatting the displacement risks experienced by County residents. However, it is insufficiently tailored to ensure that residents experiencing displacement risk will benefit from its actions during the planning period. We recommend the following revisions to ensure that this

[6] Draft 4.5 at 3-100 (PDF 184); 3-168 (PDF 252).
[7] Id. at 3-101 (PDF 185).
[8] Id. at 3-168.

action adequately supports residents at risk of displacement in compliance with Housing Element law.

> **Action 5-3h:** Prepare a comprehensive Anti-Displacement Strategy to address pressures of rising housing costs and income inequality in communities with higher displacement risk (i.e., Rouse/Colorado, Bret Harte, and Airport). The anti-displacement strategy ~~may~~ will include, but is not limited to the following:
>
> - An engagement strategy for fair housing service providers to improve upon and expand the dissemination of information on tenant protection and available fair housing resources.
> - An engagement strategy to build affordable housing developer capacity, including technical assistance on available sites, funding opportunities, and local fee waiver opportunities.
> - An evaluation of existing renter/tenant protections and anti-displacement measures that includes research on approaches by other jurisdictions to prevent displacement in vulnerable communities.
> - An engagement strategy to solicit community input and feedback regarding renter/tenant protections and anti-displacement measures in areas considered sensitive to displacement.
> - A feasibility assessment of a rental inspection and rental registry program aimed at protecting tenants in R/ECAP areas from evictions.
> - A funding strategy that inventories existing funding sources and potential funding sources that could be utilized to implement strategies.
>
> Conduct the following schedule of actions:
>
> - In 2026, conduct an evaluation of existing renter/tenant protections and anti-displacement measures and fair housing service programs, including funding sources being utilized.
> - In 2026, conduct a survey and evaluation of anti-displacement approaches used by other jurisdictions to prevent displacement in vulnerable communities, including but not limited to policies such as a tenant right to counsel, a thirty-day notice to vacate requirement, and rent stabilization.
> - By December 2026, solicit feedback via public meetings in all County CDPs considered "sensitive" to displacement risk (Rouse Colorado, Riverdale Park Tract,

Bret Harte, Bystrom, Airport, Empire, and Crows Landing) regarding existing and possible anti-displacement strategies.

- Provide the results of the evaluation, including feedback received from the public, and a specific proposal describing which Anti-Displacement measures the County should adopt to the General Plan Update Committee by April, 2027 and to the County Board of Supervisors by July, 2027.
- In 2026, prepare an engagement strategy for fair housing service providers. Implement the strategy into existing community development and housing efforts by April 2027.
- In 2026, prepare an engagement strategy to build affordable housing developer capacity. Implement the strategy by April 2007.
- In 2027, explore the feasibility of a rental inspection or registry program targeting R/ECAP areas.
- Present program options, including funding options, to the General Plan Update Committee (GPUC) by April, 2028 and to the Board of Supervisors by July 2028.

III. Conclusion

CRLA appreciates the opportunity to comment on the County's 4.5th Draft Housing Element, and we appreciate the time and energy County staff have devoted to improving the Housing Element. We are happy to answer any questions regarding the comments above. We look forward to continuing conversations and meetings with the County to discuss the Housing Element and to collaborating with the County to involve community residents in its implementation throughout the planning period.

Respectfully,

Nick Jensen

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September 25, 2025

VIA EMAIL
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Re: Salida Fire Protection District – Comment on Stanislaus County 6th Cycle Housing Element Update

Dear Stanislaus Planning Staff,

On behalf of the Salida Fire Protection District ("Salida"), this communication comments on the Stanislaus County ("County") 6th Cycle Housing Element Update.

Salida requests that the Housing Element address funding for essential fire and emergency response services for residential development within Salida's service area - specifically, the requirement that new housing development projects within Salida will, as a condition of approval, be required to join Salida's to enter into Salida's Community Facilities District ("CFD").

While the Housing Element Update provides details as to what agencies provide fire/emergency response services within the unincorporated County, it does not adequately address the financial impacts that new housing development will have on those services. In short, Salida requests that the Housing Element Update provide an analysis of how such services will be funded as the community develops. In Salida's case, a key element of offsetting the cost of new development is the payment of CFD taxes.

The Salida CFD

The Fire Protection District Act of 1987 and the Mello-Roos Community Facilities District Act authorize fire districts, like Salida, to enact a CFD to offset costs of services. (See, Health and Safety Code section 13912; Gov. Code section 53313). Mello-Roos CFDs provide a "method of financing certain public facilities and services, especially in developing areas and areas undergoing rehabilitation." (Gov. Code section 53311.5).

Consistent with that authority, 15 years ago on August 18, 2010, Salida's CFD was enacted by Salida Ordinance No. 2010-01. Since then, new development involving the issuance of building permits has been required to join the CFD and pay accompanying taxes. When forming the CFD, Salida retained governmental consulting experts Capitol Public Finance Group, which conducted a "nexus study" evidencing that the tax rates established by the CFD were legally supported as being congruent to the reasonably estimated costs on fire and emergency response services that new development imposes on the Salida community.

Purpose of the CFD

Salida is designated by the Stanislaus County Local Agency Formation Commission ("LAFCO") as the entity responsible for the provision of fire and emergency response services within its territorial boundaries. The CFD's taxes are vital to funding those fire protection and emergency response services within Salida.

The CFD taxes offset costs that new development imposes on fire protection resources and help enhance levels of emergency services as the Salida community develops. If new development fails to comply with funding mechanisms intended to offset the costs imposed on new development (*i.e.*, the need for more firefighters, fire apparatus, equipment, and fire stations), other taxpayers must effectively subsidize the new development, or levels of service are diluted.

Recent urban and wildland fires of historic proportions across California emphasize the need for local fire agency infrastructure (facilities, equipment, staffing, vehicles, and water systems) are adequate to address such fires and keep pace with new development. This is particularly true given the current need to pre-position first responders for faster response times, and to maintain the ability to combat simultaneous fires with multiple ignition points.

The County General Plan Requires Adequate Funding for Fire Services

"A general plan provides a 'charter for future development' and sets forth a city or county's fundamental policy decisions about such development." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 815). "Virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 570).

As mentioned in prior communications from Salida to County Staff, the County General Plan requires cooperation and coordination with local fire agencies for the provision – and funding – of fire and emergency response services.

Because the County has a duty to implement its General Plan (including the Housing Element), it is axiomatic that such implementation should address the issue of *how* those essential services will be funded.

As such, Salida requests that the Housing Element Update include in its analysis that development projects will pay their fair share for fire/emergency response services by being conditioned on joining the Salida CFD and paying applicable CFD taxes.

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California Rural Legal Assistance, Inc.
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July 23, 2025

Submitted via electronic mail to: planning@stancounty.com

Re: Comments on the County of Stanislaus 6th Cycle Housing Element – Fourth Draft

Ms. Freitas & Ms. Doud:

California Rural Legal Assistance, Inc. ("CRLA") submits these comments on Stanislaus County's Fourth Draft 6th Cycle Draft Housing Element (Fourth Draft). We acknowledge and appreciate the additions and improvements the County has made in the Fourth Draft, as well as the additional outreach conducted by the County that these improvements reflect. We submit these comments to highlight the need for additional revisions. These revisions must be made in order for the County to achieve substantial compliance with all aspects of Housing Element law, including its duty to affirmatively further fair housing (AFFH), and other related laws and policies.[1] In particular, the County must:

I. Update the Sites Inventory analysis to include a justification of the sites allocation for Bret Harte;
II. Comply with legal obligations under state and federal housing law, including the duty to affirmatively further fair housing;
III. Update the Assessment of Fair Housing with sufficient information and analysis about Racially or Ethnically Concentrated Areas of Poverty and Affluence (R/ECAPs and RCAAs) to substantially comply with Housing Element law;
IV. Augment the Constraints Analysis to include analysis of environmental burdens on the County's environmentally disadvantaged unincorporated communities, with corresponding adjustments to the Housing Plan;
V. Continue community engagement, in particular in lower-resourced areas;
VI. Incorporate comments from residents into the Housing Element;

[1] Cal. Gov. Code Sections 8899.50; 65583(c)(5),(10).

VII. Revise the Housing Plan to include specific commitments, discrete timelines, and appropriate metrics, as well as place-based strategies and geographically targeted programs to address specific community needs;
VIII. Update its SB 244 Analysis, its Climate Adaptation Plan, and comply with SB 1000.

I. The Sites Inventory analysis is inadequate to justify the County's allocation of lower income housing to Bret Harte, under California Government Code Section 65583.2.

California's Housing Element law requires each Housing Element to include an inventory of land suitable and available for residential development, including vacant sites and sites that have justifiable and demonstrated potential for redevelopment (Sites Inventory).[2] Additionally, the County must conduct a Sites Inventory analysis that informs the assumptions made in the Sites Inventory and the relationship of zoning and services to the sites, as well as demonstrate its ability to fulfill its share of regional housing needs.

In order to designate more than 10 acres for low-income housing on a site, the County is required to justify in its Sites Inventory analysis that development at a similar density on parcels of similar size has occurred in the jurisdiction or otherwise justify the feasibility of the use.[3]

Unfortunately, the County is noncompliant with the goal of California Government Code Section 65583.2(c)(2)(B) in the community of Bret Harte. Currently, the County proposes to use 5 sites that would provide 481 units of low-income housing.[4] While no individual site larger than 10 acres is proposed in Bret Harte, the 5 sites proposed are adjacent to each other and total 24.37 acres.[5] In essence, these proposed sites will have significant infrastructure and service needs similar to that of a single 24-acre site.

We are concerned about the County's proposal to site additional housing units in Bret Harte without justification, especially as this lower-resource community is already suffering under infrastructure and service constraints. Adding almost 500 units next to one another will overburden the limited infrastructure in Bret Harte, including schools, public transportation, sidewalks, and sewage systems.

We are also concerned about the County's proposal to place 44% of its low-income housing units required in the County's regional housing needs allocation (RHNA) in effectively

[2] Cal. Gov. Code Section 65583(a)(3).
[3] Cal. Gov. Code Section 65583.2(c)(2)(B).
[4] Fourth Draft at 5-16–5-19.
[5] *Id.*

one 24.37-acre parcel, in one lower-resourced community that the County also designates as a R/ECAP. The County has not provided any reasoning as to why it is making this proposal instead of proposing low-income units elsewhere in the County, and the County has not discussed how this could be feasible especially given the lack of infrastructure in Bret Harte. We urge the County to justify this proposal and explain how the County will feasibly accommodate so much low-income housing in such a concentrated area. To meet the goal of Section 65583.2, the County should ensure that additional housing units will not overburden existing infrastructure and services.

II. The Sites Inventory will have a disparate impact on racial minorities and low-income families and will perpetuate segregation in Stanislaus County. The County must redistribute housing units for different income levels to comply with legal obligations under state and federal housing law, including the duty to affirmatively further fair housing.

We are very concerned about several trends from the proposed Sites Inventory that show potential disparate impact on racial minorities and low-income communities, in violation of federal and state fair housing laws. Overall, Table 2 below shows that 81.70% of the low-income RHNA is allocated to R/ECAPs. This perpetuates the cycle of poverty and racial inequality in R/ECAPs. This clear trend is especially concerning considering that only 11.50% of the low-income RHNA is allocated to RCAAs.

Further, Table 1 also shows that the County proposes to allocate 44% of the County's total low-income RHNA in Bret Harte, and that more than half of the low-income RHNA allocated to R/ECAPs is allocated in Bret Harte. These trends are worrying, especially given that the County proposes to allocate only 3.97% of the above-median income RHNA in Bret Harte. The bottom line is that the County's site proposals will most likely perpetuate racial and income segregation in Bret Harte.

As it is currently proposed, the Sites Inventory violates three state laws and one federal law. First, the County violates California Government Code Section 8899.50. Section 8899.50 requires all California housing elements to affirmatively further fair housing (AFFH). The duty to AFFH means that public entities must take *affirmative steps* to end segregation and create integrated communities of opportunity. Unfortunately, Stanislaus County has not, through its Sites Inventory, taken the proper affirmative steps, of zoning for low-income housing predominantly outside of R/ECAPs, to end segregation and create integrated communities of opportunity.

Second, the County violates the Fair Employment and Housing Act (FEHA). The County has violated the FEHA by creating a discriminatory effect through its Sites Inventory.

Third, the County violates California Government Code Section 65008. California Government Code Section 65008 requires the County not to discriminate in its zoning.

Finally, the County has also violated the Federal Fair Housing Act (FHA) through its Sites Inventory. It has violated the FHA under a claim of segregative effect.

a. The Sites Inventory will increase the racial- and income-based segregation in areas of concentrated racial- and income-based segregation, in violation of the County's duty to AFFH.

The Fourth Draft of the Stanislaus County Housing Element will perpetuate racial and income segregation in R/ECAPs, in violation of its duty to AFFH.

As shown in Table 1 of this document, the County is allocating 66% of its low-income housing to two R/ECAPs: Bret Harte and Rouse/Colorado or West Modesto generally.[6] Conversely, it allocates only 4% of its above-median income housing in Bret Harte and only 15% of its above-median income housing in Rouse/Colorado or West Modesto generally.[7] In other words, the County is continuing to allocate large amounts of low-income housing to R/ECAPS, while allocating comparatively very little above-median income housing to R/ECAPs. By doing this, the County will perpetuate the cycle of poverty faced by R/ECAPs.

The express purpose of the duty to AFFH is to take meaningful actions to end historic patterns of segregation and discrimination, while promoting new integrated communities of opportunity.[8] The County is perpetuating historic patterns of segregation by maintaining the same pattern of where it has zoned for low-income housing and where it has zoned for above-median income housing, in the past.[9] The zoning pattern the County has used in the past has served to create segregated communities for at least the past thirty years.[10] By keeping effectively the same zoning pattern, the County will only perpetuate and make worse the patterns of segregation. The County does not appear to make an effort to integrate communities by allocating a fairer distribution of low-income housing units in high-resource areas, and vice versa. The County's lack of action is glaring, especially considering our previous comments that

[6] Fourth Draft at 5-16, 5-68.
[7] *Id*.
[8] Cal. Gov. Code Section 8899.50.
[9] Fourth Draft at 3-19–3-20, 5-13–5-68.
[10] *Id*. at 3-19–3-20.

shared the same concern about the current Sites Inventory. The County is explicitly failing in its duty to integrate communities, under California Government Code Section 8899.50.

b. The Sites Inventory will increase the concentration of affluence in areas of affluence, in violation of its duty to AFFH.

The Fourth Draft of the Stanislaus County Housing Element will perpetuate the racial and income based segregation in RCAAs and historically affluent communities, also in violation of its duty to AFFH.

The County is allocating more than 50% of its above-median income housing to affluent communities with at least one community being a RCAA: East Oakdale.[11] The three most egregious examples of the County zoning for above-median income housing in affluent areas are in East Oakdale, Diablo Grande, and Del Rio.[12] At all three of these affluent communities, the County has zoned for only above-median income housing, perpetuating the already present segregation of these communities.[13] By zoning for only above-median income housing, in these communities, the County is failing at its duty to end segregation and create integrated communities of opportunity.

Specific examples of the zoning disparity are listed in Tables 1–4 below. The County's zoning practice not only perpetuates segregation, but it does not allow the R/ECAPs to become integrated areas of opportunity because it keeps above-median income housing out of R/ECAPs. There needs to be a mix of housing values in communities to properly create integrated communities, due to the racial and ethnic wealth disparities created by years of differential treatment.[14] Housing in different income brackets also creates opportunities because it increases the total wealth of a community. The County has kept a stark divide between affluent areas and R/ECAPs by not effectively integrating its zoning. The County must integrate affluent areas and R/ECAPs in order to be compliant with its duty to AFFH.

[11] *Id*. at 5-52.
[12] *Id*. at 5-23, 5-30, 5-52.
[13] *Id*. at 3-19, 5-23, 5-30, 5-52.
[14] *See* Bethany R. Berger, *Race to Property: Racial Distortions of Property Law, 1634 to Today*, 64 Ariz. L. Rev. 619 (2022).

Table 1. Zoning Dependent on R/ECAP and RCAA Designation

Community	R/ECAP	RCAA	Low-income (number of units)	Low-income (% of allocated RHNA) *		Above-median income (number of units)	Above-Median income (% of allocated RHNA) *
Bret Harte	Y	N	481	43.57		31	3.97
Ceres**	Y	N	173	15.67		34	4.36
West Modesto (including Rouse/Colorado)	Y	N	248	22.46		107	13.72
Airport	Y	N	0	0		8	1.0
East Oakdale	N	Y	0	0		161	20.64
Denair	N	Y	127	11.50		93	11.92
Valley Home	N	Y	0	0		4	0.51
Orange Blossom	N	Y	0	0		0	0

*Rounded to two decimal places for readability and uniformity

**North and South Ceres are combined

Table 2. Totals of the RHNA Allocation Percentages Dependent on R/ECAP and RCCA

R/ECAP or RCCA	Total Low-income (% of allocated RHNA)	Total Above-Median income (% of allocated RHNA)
R/ECAP	81.70	22.99
RCCA	11.50	33.07

Table 3. Zoning Dependent on Affluence Designation

Community	Historically Affluent	Low-income (number of units)	Low-income (% of allocated RHNA) *	Above-median income (number of units)	Above-Median income (% of allocated RHNA) *
Bret Harte	N	481	43.57	31	3.97
Ceres**	N	173	15.67	34	4.36
West Modesto (Rouse/Colorado)	N	248	22.46	107	13.72
Airport	N	0	0.00	8	1.00
Keyes	N	58	5.25	18	2.31
Empire	N	17	1.54	43	5.51
Crow's Landing	N	0	0	5	0.64
Grayson	N	0	0	6	0.77
Turlock	N	0	0	3	0.38
Hickman	N	0	0.00	19	2.44
East Oakdale	Y	0	0.00	161	20.64
Del Rio	Y	0	0.00	131	16.79
Diablo Grande	Y	0	0.00	112	14.36
Salida	Y	0	0.00	5	0.64
Valley Home	Y	0	0.00	4	0.51
Denair	Y	127	11.50	93	11.92
Knight's Ferry	Y	0	0.00	0	0.00
Orange Blossom	Y	0	0.00	0	0.00

*Rounded to two decimal places for readability and uniformity

**North and South Ceres are combined

Table 4. Totals of the RHNA Allocation Percentages Dependent on Affluence Designation

Historically Affluent	Total Low-income (% of allocated RHNA)	Total Above-Median income (% of allocated RHNA)
N	88.49	35.10
Y	11.50	64.86

c. **The County's proposed Sites Inventory will also result in illegal discrimination under the Fair Housing Act, the Fair Employment and Housing Act, and California Government Code Section 65008.**

Stanislaus County's Sites Inventory will also have a discriminatory effect by zoning for predominantly low-income housing in communities historically affected by poverty, and zoning for predominantly above-median income housing in communities which are historically affluent. The discriminatory effect will be on based on both race and income discrimination. Please see Tables 1 and 3 above.

A discriminatory effect claim is actionable when the government uses its land zoning power, whether knowingly or unknowingly, to perpetuate segregation.[15]

First, the County's zoning practice will perpetuate a trend of segregation that started to be tracked in 1990 and has become worse since then.[16] As shown in Table 3 of this document, the County has placed 0% of its low-income housing in many affluent communities, while it zones for over 50% of its above-median income housing in those same communities.[17] The historic wealth disparity, in the United States, between non-white and white communities indicates that the people more likely to buy above-median income housing are white.[18,19] Further evidence of the historic wealth disparity is that the affluent communities in Stanislaus County are currently between 55%–100% white.[20] The current zoning practice will perpetuate the segregation of these communities and thus cause a discriminatory effect.

Neither of the County's two primary justifications for this allocation of lower and higher income housing are legally sufficient justifications under California Government Code Section 8899.50.

The County's first justification is that several of the affluent communities are zoned for low density, so those communities cannot have low-income housing.[21] The proxy for above-median income housing is low density zoning. The County appears to be saying that because the County has already zoned for above-median income housing, they must zone for above-median income housing. The County determines zoning practices in the sites inventory, so it cannot say that because something has already been zoned a certain way it must be zoned that way. In fact,

[15] *See Martinez v. City of Clovis*, 307 Cal. Rptr. 3d 64, 115–116 (Ct. App., 2023).
[16] Fourth Draft at 3-19–3-20.
[17] *Id*. at 5-20, 5-23, 5-30, 5-39, 5-42, 5-52, 5-65.
[18] *See Martinez*, 307 Cal. Rptr. 3d at 109.
[19] *See* Palma Joy Strand, Inheriting Inequality: Wealth, Race, and the Laws of Succession, 89 Or. L. Rev. 453 (2010).
[20] Fourth Draft at 3-19.
[21] *Id*. at 5-23, 5-30, 5-39, 5-42, 5-65.

the County must change its historic patterns of zoning to create integrated communities, under California Government Code Section 8899.50.[22]

The County's second justification for not zoning low-income housing in some affluent areas is lack of infrastructure in those areas. The major infrastructure problem the County cites is the lack of adequate sewage systems.[23] Infrastructure issues may have been enough to satisfy Housing Element Law's requirement not to discriminate, but California Government Code Section 8899.50 requires the County to take *affirmative* steps to end segregation. Affirmative steps would include building infrastructure. The duty to AFFH requires the County to implement programs that will allow for low-income housing in affluent neighborhoods. The County could therefore implement sewage programs like the one it promised in Rouse/Colorado, in neighborhoods which do not have proper infrastructure to zone for low-income housing in them.[24] The implementation of these programs would allow the County to zone low-income housing in R/ECAPs and other affluent communities pursuant to its duty to AFFH.

Even if the County's current infrastructure justification was legally sufficient under California Government Code Section 8899.50, it is not logically sufficient. The County ignores the fact that R/ECAPs have been continuously zoned for low-income housing despite their lack of adequate sewage systems.[25] Rouse/Colorado has not had a sufficient sewer system for more than ten years, yet the County continues to zone low-income housing there.[26] Other R/ECAPs suffer the same problems, yet the County continues to zone low-income housing in them.[27] The County's justification represents a double standard. For historically affluent communities, it is concerned about the effect the lack of adequate sewage systems will have on low-income housing. For R/ECAPs, it is not concerned about the effects the lack of adequate sewage systems will have on low-income housing. This contradiction is demonstrated by the County continuing to zone low-income housing in R/ECAPs, while failing to deliver on its promises of building adequate sewage systems in them.[28]

There are feasible alternatives to the County's current practice. As we discussed earlier, the County has already shown a commitment to increasing municipal sewage infrastructure

[22] Cal. Gov. Code Section 8899.50.
[23] Fourth Draft at 5-20, 5-23, 5-39, 5-42, 5-52.
[24] Fourth Draft at 6-21.
[25] *Id*. at 8, 3-43–3-44, 5-13, 5-16, 5-68, 6-21.
[26] *Id*. at 8, 3-43–3-44, 5-68.
[27] *Id*. at 3-43–3-44, 5-13, 5-16.
[28] *Id*.

through its program in Rouse/Colorado.[29] Again, the County can implement similar programs that will allow for low-income housing in affluent communities such as East Oakdale.

Another feasible alternative is to zone low-income housing in affluent communities, regardless of adequate sewage systems. The County has shown a willingness to zone for low-income housing in R/ECAPs without adequate sewage systems such as Rouse/Colorado and parts of Bret Harte.[30] If the County were not discriminating, it would show a willingness to zone low-income housing in affluent communities without adequate sewage systems.

In sum, the County's Sites Inventory zoning practice will result in a discriminatory effect claim under FEHA based on race and income, a segregative effect claim under the FHA based on race and income, and a discriminatory effect claim under California Government Code Section 65008 based on income.

III. The Assessment of Fair Housing does not include adequate analysis of Racially or Ethnically Concentrated Areas of Poverty or Affluence.

Under Housing Element law and the duty to affirmatively further fair housing, a Housing Element must include an assessment of fair housing in the jurisdiction.[31] The assessment of fair housing must include an analysis of "available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk."[32] This analysis "shall identify and examine such patterns, trends, areas, disparities, and needs . . . based on race and other characteristics protected by the California Fair Employment and Housing Act."[33]

In letters and guidance documents, HCD has expressed the expectation that the County use local data and knowledge to assist in analyzing and discussing any fair housing issues and circumstances unique to the County.[34,35] The County must capture emerging trends and issues, as well as historical and geographical considerations that may include land use patterns, local initiatives, zoning, proximity of housing to industrial uses, major physical dividers like highways

[29] *Id*. at 6-21.
[30] *Id*. at 3-43–3-44, 5-16, 5-68.
[31] Cal. Gov. Code Section 65583(c)(10); *see also* 8899.50(a)(1).
[32] Cal. Gov. Code Section 65583(c)(10)(A)(ii).
[33] *Id*.
[34] *See* California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing Guidance for All Public Entities and For Housing Elements,* 21. *(*Found at Affirmatively Furthering Fair Housing).
[35] *See* California Department of Housing and Community Development, *April 4, 2025, Letter.* (Found at Housing Element Download Tool | California Department of Housing and Community Development).

and railroads tracks, recent annexations, waves of development, and investment practices observed in the County.

While the County has added to the local knowledge incorporated into the Assessment of Fair Housing, the County has continued to omit key details from its analysis of its racially or ethnically concentrated areas of poverty (R/ECAPs) of Rouse/Colorado and Airport and from its racially or ethnically concentrated areas of affluence (RCAAs) in general.

Rouse/Colorado

In the 3rd draft of the Housing Element, the County made the laudable decision to commit a significant portion of its funding from the Federal Department of Housing and Urban Development (HUD) toward the completion of the Rouse/Colorado sewer project.[36] It is our understanding that completing the sewer project will enable the County to successfully use the American Rescue Plan Act (ARPA) funds allocated to the Rouse/Colorado sidewalk project by the statutory deadline of December 31, 2026. We applaud the County's decision to allocate additional funding to ensure that the planned infrastructure improvements in Rouse/Colorado will be completed in a timely manner.

The County acknowledges that the Rouse/Colorado neighborhood has significant affordability and overcrowding issues, as well as the highest displacement risk in Stanislaus County.[37] Specifically, the County states that low-income residents are at high risk of being displaced, and very low-income residents are at extreme risk of being displaced, in Rouse/Colorado.[38] While the County recognizes that residents of Rouse/Colorado face dire affordability, overcrowding, and displacement issues, the County has failed to adequately capturing these needs in its current draft.

For instance, the County participated in a May 7 community meeting hosted by CRLA in Rouse/Colorado to listen to the housing and infrastructure needs of more than 20 residents from the community. However, the County did not include this critical local data and needs into the R/ECAP analysis for Rouse/Colorado.[39] While the County included a general list of topics raised in community meetings it participated in, the County does not address the feedback it received in those meetings adequately, as we discuss in Section VI. It also does not specify what

[36] Third Draft Housing Element at 6-21 (Program Action 3-9c).
[37] Fourth Draft at 3-86, 3-92, 3-95 (Figure 3-50), 3-100.
[38] *Id*. at 3-100.
[39] Fourth Draft Housing Element, at 3-152–3-153; Table A-3 (Community Popup Events).

communities gave which feedback, so it is difficult to find geographically targeted solutions for the feedback received.

Additionally, Rouse/Colorado residents have expressed the need for more parks and recreational spaces. Currently, the former Modesto municipal golf course is the nearest space residents are able to recreate in. Alarmingly the City of Modesto is considering building a new soccer stadium over the former golf course.[40] As stadiums are notorious for causing higher rent prices, gentrification, and displacement, this proposed stadium would not only restrict residents' ability to recreate, but it would also increase the risk of gentrification and displacement in the neighborhood.[41] Despite planning for the soccer stadium in Rouse/Colorado, the County has omitted this significant proposal in its Housing Element update. The County has failed to, and must, analyze how this proposed project could exacerbate the existing affordability and overcrowding issues as well as the high risk of displacement that hundreds of low-income families already experience in this community.

Airport

As the County notes in Section 3.4.4, the 1991 Low to Moderate Income (LMI) Housing Fund/1991 CRLA agreement committed the Stanislaus County Redevelopment Agency to several actions supporting residents of the Airport neighborhood with respect to housing needs, in recognition of this neighborhood's particularly high level of displacement risk.[42] These actions included but were not limited to expanding and improving the supply of affordable housing in Airport through setting aside at least twenty five percent (25%) of gross tax increment revenue, preparing an Airport Community Plan, and ensuring replacement housing and relocation assistance is provided in the Airport neighborhood when tenants were required to relocate due to private or public development activity.[43] Although the Stanislaus County Redevelopment Agency was dissolved in 2012, the Stanislaus County Board of Directors, as its official successor agency, inherited its responsibilities to the community. The conditions of high

[40] Trevor Morgan & Quinton Hamilton, *A Professional Soccer Team, and a Stadium, are Definitely Coming to Modesto, City Says*, Modesto Bee (March 26, 2025). (Found at https://www.modbee.com/news/local/article302873904.html). Trevor Morgan & Quinton Hamilton, *Modesto City Council Punts Decision on Pro Soccer Stadium Location*, Modesto Bee (June 27, 2025). (Found at https://www.modbee.com/news/local/article309477535.html).
[41] James P. Lewandowski & Steve Stover, *Urban Redevelopment, Baseball, and Displacement in Washington D.C.*, 40 Middle States Geographer 57, 58 (2007).
[42] Fourth Draft at 3-15.
[43] *Id.*

displacement risk[44] and scarcity of affordable housing that prompted the 1991 agreement remain significant issues in the Airport neighborhood to this day.

Despite this history, the County has, over the past 13 years (since the dissolution of the Redevelopment Agency) enabled the gradual but steady encroachment of Gallo Glass Company into the Airport neighborhood. The County has consistently and without fail approved all of Gallo's rezoning requests to convert Airport's residentially zoned parcels to industrially zoned land where Gallo can develop warehouses and parking lots. This encroachment can only serve to increase the neighborhood's pollution burdens, displacement risks, and level of segregation. The following is a non-exhaustive list of actions the County has taken to allow Gallo Glass Company's encroachment into Airport's residential areas, over objections from community residents.

- April 30, 2013: The Board of Supervisors approves Gallo's rezone application PLN 2012-0037 to rezone 12.2 acres from industrial transition (IT) and single family/low-density residential (R-1), medium-density residential (R-2), multiple-family residential (R-3) zones to industrial (M).[45]

- August 27, 2013: The Board of Supervisors summarily vacates alleys and sections of road totaling 0.72 acres in residential zones in Airport to accommodate further expansion by Gallo Glass. The stated goal of this approval is "in preparation for the owner to maximize the potential of this area by creating an outdoor storage and parking area for the adjacent Gallo Glass Plant."[46]
- February 25, 2014: The Board of Supervisors approves Gallo's rezone application PLN2013-0092 to rezone 4.59 acres from R-2 to M.[47]
- May 5, 2016: The Planning Commission recommends Board approval of Gallo's variance application PLN2016-0021 of 0.75 acres that resulted in encroachment into vacant residential lots to enable another warehouse expansion.[48]

[44] *Id.* at 3-100.
[45] Board of Supervisors for the County of Stanislaus, Action Agenda Summary, (April, 30, 2013) (Found at https://www.stancounty.com/bos/agenda/2013/20130430/PH905.pdf; Planning Commission recommendation here).
[46] Board of Supervisors for the County of Stanislaus, Action Agenda Summary, (August 27,2013) (Found at https://www.stancounty.com/bos/agenda/2013/20130827/C05.pdf).
[47] Board of Supervisors for the County of Stanislaus, Action Agenda Summary, (February 25, 2014). (Found at https://www.stancounty.com/bos/agenda/2014/20140225/PH905.pdf).
[48] Stanislaus County Planning Commission, *Staff Report*, (May 5, 2016). (Found at https://www.stancounty.com/planning/agenda/2016/05-05-16/VII_B.pdf).

- July 12, 2016: The Board of Supervisors adopts a resolution vacating an alley of approximately 0.12 acres in Airport to enable Gallo to create additional parking lot space and circulation.[49]
- August 20, 2024: The Board of Supervisors approves Gallo's rezone application PLN2023- 0166 of 4.85 acres from IT and R-1 to planned development (P-D) to enable yet more warehouse expansion into Airport.[50]
- April 3, 2025: The Planning Commissions recommends amending the general plan to allow for the expansion of Gallo Glass to 0.64 acres of R-1 to P-D, PLN2024-0100.[51]

In the current draft, the County attempts to summarize its actions to rezone the Airport neighborhood over the past decades as simply rezoning industrial transition zones to industrial zones.[52] This is an oversimplified and inaccurate characterization of what has occurred. All of the rezoning approvals we cite above from 2015 to 2024 include, or were exclusively, residential zones. As a result, in the past decade alone, more than 25 acres of land, including residentially zoned parcels, have been converted to industrial zones in the Airport neighborhood. As we stated, this is not an exhaustive list of the County's rezoning actions in this neighborhood. The County admits that rezoning has been occurring in order to expand Gallo's operations since the 1980s.

The County's failure to acknowledge and incorporate its efforts to turn residential areas into industrial zones is extremely concerning. First, it violates its legal duty under Section 65583(c)(10)(A)(ii) to identify and examine patterns of segregation and displacement. Second, the County's systematic elimination of residential zones has directly resulted in increasing environmental burdens in the community. The remaining families in this neighborhood are forced to endure air quality, noise, traffic, and other impacts of the expanded Gallo Glass Company.

Ultimately, the County has failed to include local data and trend that Gallo Glass Company and other industrial facilities have and continue to edge out low-income families, while subjecting remaining families to environmental burdens and ongoing displacement risks.

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[49] Board of Supervisors for the County of Stanislaus, Board Action Summary, (July 12, 2016). (Found at https://www.stancounty.com/bos/agenda/2016/20160712/C01.pdf).
[50] Board of Supervisors for the County of Stanislaus, Board Action Summary, (August 20, 2024). (Found at https://www.stancounty.com/bos/agenda/2024/20240820/PH03.pdf; Planning Commission recommendation here: https://www.stancounty.com/planning/agenda/2024/08-15-2024/4_A.pdf).
[51] Stanislaus County Planning Commission, Staff Report, (April 3, 2025). (Found at Stanislaus County Planning Commission April 3, 2025).
[52] Fourth Draft at 3-143–3-144.

The County must include this information and create programs to remedy this concerning pattern. Specifically, the County must preserve remaining residentially zoned parcels in Airport while mitigating any environmental impacts that could occur from any expansion of Gallo's warehouses or other facilities and activities. If the County approves any additional rezoning, it must make up the lost residential units by relocating existing residents or siting residential units, including affordable units, elsewhere in the County. Unfortunately, the only program proposed, Program 1-4, would only allow the County to preserve deed-restricted or unrestricted affordable housing if threatened by potential market-rate housing projects.[53] In order to ensure that existing residents in Airport and other neighborhoods are protected from displacement and have the ability to relocate regardless of the type of development, the County should expand this program to include other developments.

RCAAs

The County acknowledges that areas like East Oakdale, Valley Home, and Orange Blossom contain predominantly white populations with higher median household incomes and are considered racially or ethnically concentrated areas of affluence (RCAAs).[54] However, the County has failed to provide information about patterns and trends that have resulted in RCAAs in these communities as required by Section 65583(c)(10)(A)(ii). The County must fulfill this mandate in order to understand and correct the historic and any current causes of segregation in Stanislaus County.

IV. The Constraints Analysis is inadequate.

California Housing Element law requires the Housing Element to include an analysis of both governmental and nongovernmental constraints upon the "maintenance, improvement, or development of housing for all income levels. . ." Cal. Gov. Code Sections 65583(a)(5) & (6). Nongovernmental constraints may include but are not limited to the availability of financing, the price of land, the cost of construction, and environmental factors such as toxic contamination, water supply, and disaster risk.

Among the housing constraints the County must identify and address in the Housing Element are constraints posed by environmental burdens and hazards.[55] These environmental burdens and hazards should include consideration of local knowledge and environmental data related to industrial land uses, freeways, airports, and industrial agriculture.

[53] Fourth Draft at 6-4–6-5.
[54] Fourth Draft at 3-18–3-19, 3-37–3-38 (Table 3-8), 3-53–3-54.
[55] Cal. Gov. Code Section 65583.2(b)(4).

As we discussed in our April 2, 2025, letter, the County has failed to and must discuss environmental constraints, including environmental burdens and hazards due to natural disasters and human activities. The County acknowledges that environmental constraints is a category of constraints it must analyze, and states that if they are "not properly recognized and accommodated in residential development, these environmental features could potentially endanger lives and property."[56] There are a number of environmental constraints that the County must include in its environmental constraints analysis. More importantly, the County must not site housing where environmental constraints exist that would endanger the health and safety of future residents.

For instance, the County is aware of but conducts no analysis of the hazards posed to unincorporated neighborhoods near industrial factories and warehouses, such as the Airport neighborhood. There is also no discussion of the potential pollution burdens posed to sites along the Crows Landing corridor, which contains a significant number of body shops and heavy automotive commercial industry. And there is only a passing mention of the concentrated pollution burdens experienced by communities adjacent to the Highway 99 corridor such as Riverdale Park Tract, Rouse Colorado, Bystrom, Airport, and Empire.[57]

Significantly, the County also does not discuss water contamination as an environmental constraint even though safe drinking water is a basic tenet of safe housing. In fact, the County proposes to put future residents in harm's way in the community of Keyes, a community that faces severe drinking water contamination issues.[58] The County is zoning for 114 units in Keyes without providing adequate analysis of how the new units will have clean water access.[59]

Further, the County makes quick mention of drought in Sections 5.6 and 5.7, but it effectively waves the issue away. We believe the County may be underestimating the issues drought could bring to water availability in unincorporated areas, particularly considering the current state of water availability in Diablo Grande.[60] We ask the County to do a more thorough analysis of how increasing drought conditions may affect water availability. If the County does find an issue with water availability in certain communities, then the County should not site additional housing in those communities or create programs to address water availability.

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[56] Fourth Draft at 4-46.
[57] Fourth Draft at 3-72.
[58] Environmental Working Group, Keyes Community Services District, Tap Water Database (June 2024) EWG Tap Water Database | Keyes Community Services District.
[59] Fourth Draft at 5-45.
[60] Andrew Pridgen, How did we get here?': Calif. megadevelopment runs out of water, SFGate (July 4, 2025), 'How did we get here?': Calif. megadevelopment runs out of water.

Programs could include the incorporation of water systems or planning and development of new water systems in coordination with the Central Valley Water Board.

Another way of identifying and addressing environmental constraints in disadvantaged or affluent areas is by creating and implementing environmental justice policies or an Environmental Justice Element in the General Plan.

V. The County must continue to make diligent efforts to achieve ongoing public participation in order to satisfy the requirements of Housing Element law.

California Housing Element law requires the Housing Element development process to "include 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 and the program shall describe this effort."[61] Diligent efforts, as defined by HCD's and the Federal AFFH Guidance, should be "frequent," "ongoing," and enable a "conversation" between County staff and community residents of all economic segments, including low- and very low-income residents.[62] Further, the AFFH Guidance recommends that public participation occur throughout the development of the Housing Element.

Prior to the original draft of the Housing Element, the County held only one public workshop in person and one public workshop online. The in-person workshop was attended by only 10 community members, a number that included CRLA staff. Following HCD's letter finding the first draft Housing Element out of substantial compliance, the County met with CRLA in early 2024 to discuss methods of conducting more effective outreach. Methods such as holding in-person meetings in specific communities, where community-specific housing questions and concerns could be addressed. Through these meetings, the County could then obtain local knowledge to create appropriate, geographically targeted programs and actions for the Housing Plan. We are happy to see that the County conducted additional community engagement sessions in April and May of 2025: with the communities of Airport, Grayson, Parklawn, Rouse/Colorado, South Modesto, and West Modesto.[63] We would like to see the County include more communities in their participation.

While we commend the County for its increase in public participation, we are concerned that the County may not be spending enough time with each community. The AFFH Guidance

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[61] Cal. Gov. Code Section 65583(c)(9) [emphasis added].
[62] *See* California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing Guidance for All Public Entities and For Housing Elements,* 21. *(*Found at Affirmatively Furthering Fair Housing); Federal Register Vol. 80, No. 136, 42289, 42338.
[63] Fourth Draft at PDF page 447-448.

recommends ongoing public participation in order to foster a conversation between various communities and the County.[64] By only meeting with the above communities once, the County may not have enough information to ensure the Housing Element Programs are sufficient to meet the needs of each community. Indeed, while the County summarized a list of housing and infrastructure issues raised during the meetings, it has not incorporated many of these needs into its Fourth Draft. In Section VI, we discuss the specific needs which the county has not addressed, but the public has listed. We urge the County to continue engaging the public, including Rouse/Colorado, Airport, and other under-resourced communities until a decision on this draft is made, so the County can make up for its earlier limited public participation.

CRLA again commends the County for taking new steps to begin to conduct the diligent outreach contemplated by Housing Element law. We believe ongoing participation will be invaluable to ensuring the success of the Housing Element's Programs. Ensuring that the County maintains its more frequent public participation will also keep it in compliance with the AFFH Guidance on diligent participation. CRLA will continue to support the County's efforts to achieve public participation in the County's disadvantaged, unincorporated communities.

VI. The County has failed to adequately incorporate or address public feedback in the Fourth Draft.

In the letters HCD has sent in response to each of the County's previous drafts, HCD has required the County to continue to describe and *incorporate* the public feedback it receives into subsequent drafts. Without considering and incorporating public input on the Housing Element process, the County will be unable to respond effectively to the needs of the community and will fail to substantially comply with its legal requirements.[65]

a. The Housing Element fails to adequately address comments received during meetings with community residents.

On May 7, 2025, the County attended and presented at a meeting held by CRLA for residents of Rouse/Colorado to provide community education and solicit community feedback about current and upcoming housing and infrastructure related projects and processes, including the Housing Element. At this meeting, residents shared several housing related concerns:

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[64] *See* California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing Guidance for All Public Entities and For Housing Elements,* 21. *(*Found at Affirmatively Furthering Fair Housing); Federal Register Vol. 80, No. 136, 42289, 42338.
[65] Cal. Gov. Code Section 65583(c)(9).

- *Cost burden and risk of displacement*. Tenants expressed fears of displacement due to rents that escalate at a frequency and amount too high for them or their neighbors to be able to afford.
- *Code enforcement failures*. Tenants expressed that Code Enforcement does not always conduct adequate inspections when complaints are made about habitability issues. Even when code enforcement does come to make the inspection, there is not always enforcement against landlords who are found guilty of code violations, and there is rarely follow-up after the inspection to ensure that the required changes are made.
- *Cost of utilities and homeowner insurance*. Tenants and homeowners both reported concerns regarding the cost of housing related expenses such as utilities and insurance.

The public's concern of *cost burden and risk of displacement* is still not adequately addressed by the programs in the Housing Plan. First, there should be a rent stabilization ordinance implemented by the County. While we understand some members of the public are hesitant to adopt more stringent rent stabilization ordinances, the adoption of a rent stabilization ordinance would benefit a large section of the at-risk population and result in less displacement.[66] We urge the County to consider adopting a more stringent rent stabilization ordinance, to ensure that the at-risk residents of the County can stay housed.

Second, there are little additional protections provided to those being evicted, despite the fear of eviction in Rouse/Colorado and other low-income communities being obvious. We recommend the County do more to protect those being evicted. Programs that would help ease people's fears and protect evictees could include: a just cause eviction ordinance as is present in Los Angeles, or a tenant right to counsel program which already exists in several major cities inside and outside of California.

The public's concern of *code enforcement failure* is also not being well addressed by the programs in the Housing Plan. The most obvious program action for code enforcement is Action 1-1g. While we appreciate the County's addition of more specifics to Action 1-1g, we do not believe that it does enough to assuage the issues with code enforcement. We recommend that the County adopt a rental registry and rental safety inspection program, and that the County put additional resources into code enforcement (e.g., hire additional code enforcement officers), to fully address the concerns of residents. Program 1-2 also deals with code enforcement, but it is lacking in legal sufficiency, which we discuss in more detail in Section VII.

[66] Fourth Draft at PDF page 448.

Finally, we believe the County could do more to address the public's concern about *the cost of utilities and homeowner insurance*. The County does currently have programs in place to assist individuals with rent. CRLA commends the County for having these programs and assuring that information on them is being spread to at-risk individuals. However, the public's ongoing concern about the cost of utilities and homeowner insurance indicates that there is a need for more assistance. CRLA recommends four programs to address the need for more assistance in renting and homeownership: utility payment assistance, permanent rental assistance, insurance consultation for low-income homeowners, and more opportunities for financial planning trainings.

VII. The Housing Plan has many good updates, but it remains inadequate to properly serve at-risk populations.

In its April 4, 2025, letter to the County, HCD informed the County that in order to achieve substantial compliance with state Housing Element law the County must adjust the Housing Plan to include specific commitments, discrete timing, metrics or numeric objectives, and geographic targeting. The Housing Plan must also be adjusted to expand and improve actions to address displacement risk, housing mobility, and place-based strategies toward community revitalization. Lastly, HCD asked that the County use the programs in the Housing Plan to address broader community development issues such as parks, housing conditions, neighborhood revitalization, community facilities, pollution burdens, and food access.

a. While the County is on the right track with many of its changes to the Housing Plan programs, it still needs to include sufficiently specific commitments, discrete timelines, numeric objectives, and geographical targeting in other programs.

Overall, we commend the County's updates to its programs. We are impressed by the changes it has made, and we appreciate the commitment it has shown to more concrete goals. However, several programs could still benefit from specific commitments to action, discrete and realistic timelines, numeric objectives, and geographical targeting.

First, the County includes June 2025 as a deadline for several actions; June 2025 has passed, and this deadline must be updated accordingly. The County should update the timelines, or include the results, of program actions: 1-1e, 1-2a, 3-1a, 3-1c, 3-1e, 3-1h, 3-3a, 3-5a, 3-6c, 3-6d, 3-6e, 3-6f, 3-6g, 3-6I, 3-6j, 3-7e, 3-7f, 3-7g, 3-8b, 4-1a, 4-1b, 4-1c, 4-1e, 4-2c, 4-3e, and 4-4c.

Additionally, we recommend that the County strengthen the following proposed programs:

Program 1-2:

Program Action 1-2a indicates the County will determine if it is necessary to amend the County Code to be in compliance with California Health and Safety Code Section 17970.5.[67] It is necessary to amend the County Code to be in compliance with Health and Safety Code Section 17970.5 because compliance with Section 17970.5 is a legal obligation. Therefore, the County must make a more specific commitment to amending its code. Further, the County must also update its code to reflect the requirements of California Health and Safety Code Section 17970.7.

Program 1-4:

In order to ensure that existing residents in Airport, Rouse/Colorado, and other vulnerable neighborhoods are protected from displacement and can relocate regardless of the type of development, the County should expand this program to include other developments. Specifically, we propose the following revision in red: "This program is intended to support the preservation or acquisition of restricted affordable units and unrestricted affordable units that could potentially convert to market-rate units and other developments during the planning".[68] Additionally, we urge the County to revise Action 1-4a accordingly: "Action 1-4a: Monitor the status of any deed-restricted and unrestricted affordable units built in the unincorporated County. If any at-risk units are identified, the County will complete actions 1-4b to 1-4f".[69] Finally, we urge the County to perform Action 1-4a not just annually but also as proposed developments are being considered by the Planning and Community Development Department, in order to truly take proactive actions to protect existing residents from displacement at the first instance. Therefore, the County should revise the Objective and Timeframe Section of Action 1-4a to: "Annually and as project proposes are considered by the Planning and Community Development Department".

Program 2-4:

We are pleased to see that the County proposes to focus efforts to increase home ownership under Program 2-4 in under-resourced communities facing a high displacement risk,

[67] Fourth Draft at 6-4.
[68] Fourth Draft at 6-4 (Program 1-4).
[69] Fourth Draft at 6-5 (Program 1-4, Action 1-4a).

including the Rouse/Colorado, Bret Harte, and Airport communities.[70] We would, however, like to see the County add specific language about helping first time homebuyers into the program, to ensure that the program is sufficiently focused on a specific objective.

Program 2-5:

We are also pleased to see that in Program 2-5, the County proposes to assess the feasibility of a housing trust fund by December 2025 and establish a fund by December 2026. However, instead of "advocating" for the inclusion of a bonus for projects in lower-resource areas, the County should simply require that the fund include providing a bonus for affordable housing units in lower-resource areas.[71]

Program 3-1:

We are concerned that Program 3-1 does not contain sufficient actions to ensure that an adequate number of sites will be developed to accommodate the County's low- and very low-income housing allocation. We urge the County to augment the actions under Program 3-1 with a commitment to adopting an inclusionary zoning policy requiring developers to set aside a fraction of newly constructed housing units to be affordable to lower-income households. Inclusionary zoning policies combat historic patterns of racial segregation and exclusion and reduce displacement risk by encouraging the creation of mixed-income level housing developments in affluent neighborhoods.[72] Jurisdictions throughout California have successfully implemented inclusionary zoning policies, resulting in the construction of 30,000 newly constructed affordable homes in the last 25 years.[73] Adopting an inclusionary zoning ordinance would help to ensure that an adequate number sites would be developed for low and very low-income County residents and represent a strong step toward affirmatively furthering fair housing.

Program 4-2:

We are concerned that Program 4-2 lacks sufficient commitment to habitability enforcement for farmworker housing.[74] As the program stands currently, it makes no specific commitment to enforcing the Health and Safety Code in farmworker housing. The program in its current state only states the goals of discovering whether there are habitability issues in farm working housing. Legislative findings state that there are habitability issues in farmworker

[70] Fourth Draft at 6-9 (Program 2-4).
[71] Fourth Draft at 6-10.
[72] Policy Link, Inclusionary Zoning. (Found at Inclusionary Zoning | PolicyLink)
[73] Id.
[74] Fourth Draft at 6-24–6-25.

housing.[75] We appreciate that the County wants to make further findings alongside UC Davis about habitability issues, pursuant to AB1654, but the County needs to make a specific commitment to enforce habitability after those findings are made.[76,77] Alongside this specific commitment, the County needs a discrete timeline as to when it will begin code enforcement in farmworker housing, to combat the habitability issues.

b. The Housing Plan should include additional programs to support community-specific housing needs.

In the Fourth Draft, the County has failed to incorporate additional program actions to address community-specific housing needs. However, there are a number of programs the County could consider adding to the Housing Plan to address these housing needs and substantially comply with Housing Element law. We have provided some examples below:

i. Rent stabilization ordinance

Currently, Stanislaus County allows a 5% annual increase in rent plus the percent change in cost of living or 10%, depending on which is lower.[78] There are, however, other jurisdictions in California which only allow a yearly increase of 3%; some going so far as only allowing a 1.7% increase.[79] Stanislaus County should follow the trend of areas such as Orange County and bring their cap down to 3%.[80] Failing that Stanislaus County should consider following in the steps of unincorporated Los Angeles County and drop the maximum allowable yearly increase to 4%.[81] Rent increases push people out of their homes, exacerbating the homelessness crisis and creating segregated communities.[82] To alleviate the homelessness crisis and help end segregation, the County should decrease the amount that rent is allowed to be increased on a yearly basis. This ordinance should also apply to mobile-home owners as they are often lower-income.

ii. Tenant right to counsel in eviction proceedings

We recommend that the County implement a program that gives tenants the right to counsel in eviction proceedings. Tenants who have professional counsel in eviction proceedings

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[75] *Id*.
[76] *Id*.
[77] *See* California Health and Saf. Code Section 17001; *see also* Cal. Health and Saf. Code Section 17050, note 1.
[78] California Department of Justice, *Local Rent Stabilization Laws Permissible Rent Increases*, Office of the Attorney General. (Found at Local Rent Stabilization Laws: Permissible Rent Increases - English - Consumer Alert - California Department of Justice).
[79] *Id*.
[80] *Id*.
[81] *Id*.
[82] *See* Emily Ponder, Gentrification and the Right to Housing: How Hip Becomes a Human Rights Violation, 22 Sw. J. Int'l L. 359, 378 (2016).

are *much* more likely to fare well in court, with either better terms of their eviction or no eviction at all.[83] When one combines state and federal statutes, common law, and local ordinances, it takes a very long time to understand what rights a tenant has in the face of an eviction.[84] A tenant facing eviction does not have the time nor resources to understand her rights.[85,86] The barrier to having rights should not be whether a person has time to discover them.

To ensure tenants get their rights regardless of whether they have the time or resources to understand them, San Francisco adopted the No Eviction Without Representation Act ("Prop F").[87,88] Prop F requires that tenants facing eviction have professional legal representation; it is funded by the city and legal services.[89] Cities across the United States have implemented similar right to representation propositions with the most recent proposition being in St. Louis.[90] Less densely populated areas have yet to follow the trend, but evictions are just as destructive to people's lives in areas where the population is smaller.[91]

The benefits of having a right to counsel in eviction proceedings outweigh the burden of its implementation.[92] The primary benefit of having a right to counsel in eviction proceedings is that it prevents many people from becoming homeless.[93] With more people becoming homeless, the burdens on the community skyrocket.[94] The community must provide shelters, public benefits, increased police intervention, and the community tends to lose property value overall.[95] Not to mention the burden on the people themselves, without a home, people have little water access, no shelter against the elements, and an inability to live with modern dignity.[96] The effects of an eviction are destructive to the people who are evicted and the communities they live in, so people should have the right to counsel when being put through an eviction.[97]

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[83] *See* Ericka Petersen, Building a House for Gideon: The Right to Counsel in Evictions, 16 Stan. J.C.R. & C.L. 63, 79 (2020).
[84] *See* Shera C. Grant, Civil Gideon: A Judge's Perspective on the Right to Counsel in Eviction Cases, 20 Stan. J.C.R. & C.L. 101, 122. (2024).
[85] *See* Ericka Petersen, Building a House for Gideon: The Right to Counsel in Evictions, 16 Stan. J.C.R. & C.L. 63, 65–66 (2020).
[86] *See* Shera C. Grant, Civil Gideon: A Judge's Perspective on the Right to Counsel in Eviction Cases, 20 Stan. J.C.R. & C.L. 101, 122–123. (2024).
[87] *See id*. at 121.
[88] All Home, Tenant Right To Counsel Program. (Found at Tenant Right to Counsel Program » All Home).
[89] *Id*.
[90] *See* Shera C. Grant, Civil Gideon: A Judge's Perspective on the Right to Counsel in Eviction Cases, 20 Stan. J.C.R. & C.L. 101, 121 (2024).
[91] *See Id*.
[92] *See Id*.
[93] *See* Ericka Petersen, Building a House for Gideon: The Right to Counsel in Evictions, 16 Stan. J.C.R. & C.L. 63, 70 (2020).
[94] *See Id*.
[95] *See Id*.
[96] *See Id*. at 69–70.
[97] *See Id*. at 112.

The meaningful actions required by the duty to AFFH should include ensuring the ability of at-risk populations to keep their housing.[98] At-risk populations are often those that are being refused housing, because they have an eviction on their record, or are those being maliciously evicted.[99] Having a right to representation would help vulnerable populations keep their homes, in the face of a malicious eviction or, failing that, receive better terms when they are evicted.[100,101]

At a minimum, Stanislaus County should investigate its ability to create a program which will require legal representation for low-income households facing eviction. We believe the Tenant Right to Counsel will ensure displacement in Unincorporated Stanislaus County stays low.

iii. Required thirty-day notice to vacate

The CARES Act requires that tenants be given a thirty-day notice to vacate if they live in federally subsidized housing.[102] The CARES Act was passed in a time of crisis for the United States, the COVID pandemic.[103] California still faces dual crises: affordable housing and homelessness.[104] To combat the large volume of people becoming homeless, it is necessary to provide people sufficient time to get new housing before they are required to leave their prior housing.[105]

Once people become homeless, it is more difficult to find housing due to risks of criminality inherent in homelessness, which further exacerbates the homelessness crisis.[106] Homelessness also contributes to the perpetuation of wealth disparity in historically disadvantaged communities because the populations most likely to become homeless are those that have low incomes.[107] It should not matter whether people are living in federally subsidized housing; everyone deserves a place to live while they look for their next home. We urge the County to encode an expanded version of the CARES Act requirement for a thirty-day notice to vacate, in a program. This will hopefully help to reduce the homelessness crisis.

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[98] Cal. Gov. Code Section 8899.50.
[99] *See* Ericka Petersen, Building a House for Gideon: The Right to Counsel in Evictions, 16 Stan. J.C.R. & C.L. 63, 78 (2020).
[100] *See Id*.
[101] *See* Emily Ponder, Gentrification and the Right to Housing: How Hip Becomes a Human Rights Violation, 22 Sw. J. Int'l L. 359 (2016).
[102] 116 P.L. 136; 2020 Enacted H.R. 748; 116 Enacted H.R. 748; 134 Stat. 281.
[103] *Id*.
[104] *See* Ismael Perez, It's Time to Take Accountability: California Is Ready and Able to Solve Homelessness, 54 U. Pac. L. Rev. 533, 534 (2023).
[105] *See Id*.
[106] *See* Seth Lemings, The De-Criminalization of Homelessness, 10 U.C. Irvine L. REV. 287, 294–301 (2019).
[107] *See* Eve Garrow, et al., Outside the Law: The Legal War Against Unhoused People, AM. C.L. Union Cal.. 8 (2021).

iv. First time home buyer program

The County has previously implemented a First-Time Home Buyer Program, and we believe that it would still be relevant to include a similar program in the current Housing Element. The housing affordability crisis in California, combined with the low-income of many of the residents in Unincorporated Stanislaus County, indicates the necessity of having a method of helping first-time home buyers purchase a residence. The County should continue to examine potential funding sources for a first-time home buyer program. We are aware the County has continued a similar program: Program 2-4. We recommend that the County more explicitly state that it will help first-time home buyers in Program 2-4.

VIII. The County must update its SB 244 analysis, Climate Adaptation Plan, and comply with SB 1000.

In the May 9, 2025 comment letter submitted by the Environmental Justice Bureau (Bureau), the Bureau points out that the County has failed to and must update its SB 244 analysis, which is required each time it updates its Housing Element.[108] We agree and urge the County to do so in order for it to have a current and accurate understanding of the infrastructure and services needs of disadvantaged unincorporated communities.

Additionally, the County has failed to and must update its Climate Adaptation Plan in the Safety Element because of its revision to the Housing Element, under California Government Code Section 65302(g)(4).[109]

Finally, we are concerned that the County still does not comply or attempt to comply with SB 1000. SB1000 requires the County to incorporate an Environmental Justice (EJ) Element or environmental justice policies throughout its General Plan when two or more elements are being updated at the same time.[110] The County has clarified and added additional programs involving Environmental Justice, but that is not sufficient and still does not meet the requirements of SB 1000. We continue to urge the County to adopt an EJ Element or create comprehensive environmental justice policies to ensure that policies and programs in the Housing Element and other parts of the General Plan do not disproportionately negatively impact disadvantaged communities and address environmental hazards facing these communities.

IX. Conclusion

[108] Ashley Werner, May 9, 2025 Letter, California Department of Justice, 3. (Found at May 9, 2025 - Stanislaus County - Attorney General's Comment Letters).
[109] *See also id*. at 13.
[110] Cal. Gov. Code Section 65302(h)(C)(2).

CRLA appreciates the opportunity to comment on the County's Fourth Draft Housing Element, and we appreciate the time and energy County staff have devoted to improving the Housing Element and increasing the amount of public engagement during the most recent stage of its development process. We would be happy to engage in further conversations and meetings with the County to discuss the Housing Element, and we look forward to continued collaboration on future public engagement efforts.

Respectfully,

Nick Jensen

Unincorporated Community Justice Program Managing Attorney

California Rural Legal Assistance, Inc.

Kyler Casper

Unincorporated Community Justice Program Legal Intern

California Rural Legal Assistance, Inc.

cc:

HCD, housingelements@hcd.ca.gov
Emily Hovda, Emily.hovda@hcd.ca.gov

From: pgolling@bpfire.com
To: Kristin Doud
Cc: Angela Freitas
Subject: RE: Stanislaus County 6th Cycle Housing Element Fourth Draft
Date: Tuesday, July 15, 2025 7:15:50 PM
Attachments: image001.png

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Correct Burbank Paradise Fire District

From: Kristin Doud <Doudk@stancounty.com>
Sent: Tuesday, July 15, 2025 4:16 PM
To: pgolling@bpfire.com
Cc: Angela Freitas <ANGELA@stancounty.com>
Subject: RE: Stanislaus County 6th Cycle Housing Element Fourth Draft

My apologies I see now that I scrolled down…It is the Burbank Paradise Fire District. Thank you.

From: Kristin Doud
Sent: Tuesday, July 15, 2025 4:15 PM
To: pgolling@bpfire.com
Cc: Angela Freitas <angela@stancounty.com>
Subject: RE: Stanislaus County 6th Cycle Housing Element Fourth Draft

Thank you for your response. Can you please clarify for the record which fire district you work for? Is it the Burbank Paradise Fire District?

From: pgolling@bpfire.com <pgolling@bpfire.com>
Sent: Tuesday, July 15, 2025 3:27 PM
To: Planning <planning@stancounty.com>
Cc: Angela Freitas <ANGELA@stancounty.com>; Angelica Duenas <DUENASA@stancounty.com>; Jeremy Ballard <BALLARDJ@stancounty.com>; Kristin Doud <Doudk@stancounty.com>; Patricia Sanchez <sanchezp@stancounty.com>
Subject: RE: Stanislaus County 6th Cycle Housing Element Fourth Draft

***** WARNING:** This message originated from outside of **Stanislaus County. DO NOT** click links or open attachments unless you recognize the sender and know the content is safe *******

Public Comment on Draft Housing Element – Fire Protection Impact

As a Fire Chief in a Mix of incorporated / unincorporated area of Stanislaus County, I am writing to express urgent concern that the Draft 6th Cycle Housing Element fails to address the critical issue of fire protection capacity. The rezoning of parcels to allow for higher-

density housing in unincorporated communities like Bret Harte, Crows Landing, Empire, and West Modesto must be matched with a corresponding increase in funding to the independent Fire Districts that protect these residents.

Without a mechanism to allocate a fair share of County-collected property and sales taxes to the Fire Districts serving these areas, this plan will significantly burden response times, staffing levels, and public safety.

We ask that Stanislaus County:

1. Include a detailed fiscal plan for how Fire Districts will be supported to meet projected service demands.
2. Commit to reevaluating property tax sharing agreements with Fire Districts serving rezoned communities.
3. Include fire protection infrastructure, staffing, and ISO ratings as a required component of housing planning in disadvantaged communities.

Growth must be safe, responsible, and equitable. We ask that you support your local fire agencies in meeting this challenge head-on.

Respectfully,
Chief Peter Golling

Chief Peter Golling
Burbank Paradise Fire Department
1313 Beverly Drive
Modesto CA 95351
Station – 209-523-1129
Cell – 209-342-8092
E-mail – pgolling@bpfire.com

From: Planning <planning@stancounty.com>
Sent: Tuesday, July 15, 2025 12:52 PM
Cc: Angela Freitas <ANGELA@stancounty.com>; Angelica Duenas <DUENASA@stancounty.com>; Jeremy Ballard <BALLARDJ@stancounty.com>; Kristin Doud <Doudk@stancounty.com>; Patricia Sanchez <sanchezp@stancounty.com>
Subject: Stanislaus County 6th Cycle Housing Element Fourth Draft

Good afternoon,

The fourth draft of the Stanislaus County's 6th Cycle Housing Element is available for public review and comment from **July 15, 2025 to July 23, 2025** at: https://www.stancounty.com/planning/pl/housing-element.shtm. Interested persons may submit

written comments regarding the fourth draft of the 6th Cycle Housing Element Update to the Stanislaus County Department of Planning and Community Development by mail or e-mail, at 1010 10th Street, Suite 3400, Modesto, CA 95354 or at planning@stancounty.com.

El cuarto borrador del 6to Ciclo del Elemento de Vivienda del Condado de Stanislaus está disponible para revisión pública y comentarios del **15 de julio de 2025 al 23 de julio de 2025** en: https://www.stancounty.com/planning/pl/housing-element.shtm. Las personas interesadas pueden enviar comentarios por escrito sobre el cuarto borrador de la Actualización del Elemento de Vivienda del 6to Ciclo al Departamento de Planificación y Desarrollo Comunitario del Condado de Stanislaus por correo postal o electrónico, en 1010 10th Street, Suite 3400, Modesto, CA 95354 o en planning@stancounty.com.

Stanislaus County
Department of Planning and Community Development

California Rural Legal Assistance, Inc.

Rural Roots, Justice for All

Stanislaus County
Planning and Community Development Department
1010 10th St. Suite 3400
Modesto, CA 94353

August 1, 2025

Submitted via electronic mail to: planning@stancounty.com

RE: General Plan Amendment, Rezone, and Ordinance Amendment Application No. PLN2025-0053 – 6th Cycle Housing Element Implementation and Objective Design Standards Early Consultation

Dear Ms. Doud:

California Rural Legal Assistance, Inc. submits these comments to express our concerns regarding the General Plan Amendment, Rezone, and Ordinance Amendment Application No. PLN2025-0053 – 6th Cycle Housing Element Implementation and Objective Design Standards Early Consultation. In brief, we are concerned that:

I. The Implementation Package is premature because the County has not yet developed a Housing Element Sites Inventory compliant with Fair Housing and Housing Element Law;
II. The County must adopt a supplemental EIR to address the substantial increase in the severity of significant effects identified in the previous EIR;
III. And the County must adopt a supplemental EIR to address the substantial changes in circumstances since the previous (2016) EIR was created.

Thank you for your consideration of our comments.

I. The County must remedy its Sites Inventory's violations of Fair Housing and Housing Element law prior to soliciting feedback from responsible agencies regarding the rezones the County will propose to implement its Housing Element.

We are concerned that the General Plan Amendment, Rezone, and Ordinance Amendment Application No. PLN2025-0053 – 6th Cycle Housing Element Implementation and Objective Design Standards Early Consultation (Implementation) is premature because the County has not yet corrected legal deficiencies in the current, Fourth Draft of the 6th Cycle Housing Element in

Stanislaus County (Fourth Draft). We discuss these legal deficiencies and other concerns about the Fourth Draft in a letter we submitted on July 23, 2025. We have included this letter as an attachment below.

In particular, we reiterate our concerns that the Fourth Draft's proposed Sites Inventory violates state and federal housing laws and must be amended in order to comply with the County's legal obligations:

a. **The County has not provided sufficient justification or explanation for zoning a large portion of its low-income Regional Housing Needs Allocation (RHNA) in, effectively, one 24-acre parcel in the community of Bret Harte.** The County has proposed to allocate 44% of its total low-income RHNA in Bret Harte, across 5 immediately adjacent sites intended to contain up to 489 housing units. This allocation perpetuates the segregation already experienced by residents of Bret Harte, which is one of the County's most segregated and low-resourced communities. As the 5 immediately adjacent sites form, in effect, a single 24-acre parcel, this allocation also violates California Government Code Section 65583.2, which requires the County to justify the feasibility of zoning for low-income housing in parcels larger than 10 acres in its Housing Element.

b. **The County has violated of California Government Code Section 8899.50 (the duty to Affirmatively Further Fair Housing), the Fair Housing Act, the Fair Employment and Housing Act, and California Government Code Section 65008 by zoning for over 80% of its low-income housing in Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs).** The duty to AFFH is the duty to create integrated communities of opportunity and take affirmative steps to end segregation. The Fair Housing Act and Fair Employment and Housing Act both require the County not to discriminate based on protected characteristics, in its zoning practices. Finally, California Government Code Section 65008 requires the County not to discriminate based on income, in its zoning practices. The County has zoned over 80% of its allocated low-income RHNA to areas with R/ECAPs.[1] At the same time, it has zoned for only 12% of its allocated low-income RHNA in historically affluent communities.[2] This allocation will keep segregated communities segregated,[3] failing to AFFH and perpetuating racial, ethnic and income discrimination prohibited by the Fair Housing Act, the Fair Employment and Housing Act, and California Government Code Section 65008.

Until the County has developed a legally compliant Sites Inventory, it is pointless to publish for public review an implementation package of rezones intended to accomplish the Sites

[1] Stanislaus County Fourth Draft 6th Cycle Housing Element (Fourth Draft) at 5-13–5-68.
[2] Id.
[3] General Plan Amendment, Rezone, and Ordinance Amendment Application No. PLN2025-0053 – 6th Cycle Housing Element Implementation and Objective Design Standards Early Consultation (Implementation) at PDF pages 3–4.

Inventory's housing unit allocation. The County must remedy its Sites Inventory's violations of fair housing and Housing Element law before soliciting feedback from responsible agencies on its proposed rezones.

II. The County must conduct a supplemental environmental impact report (SEIR) on the 6th Cycle Housing Element and related documents. The County has not considered additional and increasing environmental impacts in several of the communities which it has rezoned for low-income housing. If the County does not conduct a SEIR, it would subject low-income families to environmental hazards that could result in significant harm to the health of these families.

A lead agency must conduct a supplemental environmental impact report when:

1) New significant environmental effects or a substantial increase in the severity of previously identified significant effects exist in the project;

2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will involve new significant environmental effects or substantial increase in severity of previously identified significant environmental effects; or

3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows that the project will have new significant effects or would result in substantially more severe than discussed in the previous EIR, or that additional, feasible mitigation measures are available.[4]

The rezones proposed by the County in this Implementation Package will substantially increase the severity of the previously identified significant effects identified in the 2016 EIR. Furthermore, as the last EIR was conducted nearly a decade ago, the change in countless local circumstances and new, substantially important local information that has arisen since 2016 necessitate the creation of a supplemental EIR for the proposed rezones. The vast majority of the County's current allocation of lower income housing RHNA is intended to be contained within these rezone sites. It is critical for the health and safety of future residents of these sites for the County to assess the environmental impacts of rezoning such a significant amount of higher density housing in areas that are already resource-deficient and have experienced 9 years of continuous changes in circumstance and increasing levels of environmental risk.

[4] Cal. Code Regs. Tit. 14, section 15162(a).

a. The County must create a supplemental EIR to address the significant effects that will be caused by increasing the allowable density of housing at the proposed rezone sites.

The County is proposing to rezone several sites to allow housing at a significantly higher density, with the intention of accommodating a significant portion of their lower income RHNA.

- In Bret Harte, the County is proposing to rezone 5 parcels, occupying 24.37 acres, from low-density residential to higher density residential.[5] In the Draft Housing Element's Sites Inventory, the County indicated their expectation that these 5 parcels will contain up to 486 housing units collectively.[6]
- In Bystrom, the County is proposing to rezone parcel 038-017-041 from planned development to multiple-family residential.[7] On this parcel, the County expects to accommodate up to 62 lower income housing units.[8]
- In South Ceres, the County is proposing to rezone parcel 053-031-023, 3703 Collins Road, from planned development to medium-high density residential.[9] The County expects for this site to accommodate up to 83 lower income housing units.[10]
- In Spencer/Marshall, the County is proposing to rezone 39 parcels totaling 32.37 acres from lower density residential to higher density residential.[11] These sites, collectively, are intended to accommodate up to 261 lower income housing units.[12]

The proposed rezoning of these parcels to accommodate such a significant number of lower-income units – potentially up to 90% of the County's overall lower income RHNA allocation in the above listed subset of sites alone – in areas that are already low or extremely low in their access to resources will cause a substantial increase in the severity of previously identified significant effects on greenhouse gases, air quality, public services, transportation, and recreational resources in the surrounding areas. This will disproportionately impact the low and very low income populations who would be most likely to seek housing in these areas. The significant impacts of the proposed rezoning triggers the need for a supplemental environmental impact report under CEQA Guidelines section 15162(a).

i. The proposed rezones will have significant impacts on the levels of greenhouse gases generated in these areas and must be assessed as part of a supplemental EIR.

The proposed rezoning of Bret Harte to include 489 units of housing will have a new impact on greenhouse gas emissions, not sufficiently acknowledged by the 2016 Environmental

[5] Id.
[6] Fourth Draft at 5-18.
[7] Implementation at PDF page 4.
[8] Fourth Draft at 5-50.
[9] Implementation at PDF page 4.
[10] Fourth Draft at 5-60.
[11] Implementation at PDF page 4.
[12] Fourth Draft at 5-72.

Impact Report (EIR).[13] The increase in density of Bret Harte, in an area without any resources other than housing, will result in an increase in vehicle miles travelled (VMT), not mitigated by previously implemented policies, causing an increase in greenhouse gas emissions.[14] The mitigation measures in the EIR are not tailored to the extremely dense and wholly residential areas zoned for in Bret Harte. Any measure implemented in the County's Land Use Element to mitigate VMT does not include Bret Harte, as the community of Bret Harte was not explicitly included in the County's Land Use Element.

Further, the density of housing proposed to be in Bret Harte, combined with the distance from necessary amenities in Bret Harte, will make the alternative forms of travel proposed in Land Use Policy Twenty-Nine infeasible.[15] For example, it is extremely unlikely that every household will use a bicycle to travel 2.5 miles to the nearest grocery store. It is also unlikely that any public transport system that can be feasibly established by the County would be able to service 489 households. Currently, only one bus line runs every thirty minutes servicing the entirety of Bret Harte. Even were the County to assume that public transport would be added to the current public transport in Bret Harte, it would need to increase the capacity of that infrastructure substantially to service an additional 489 units. This similarly makes Land Use Policy Thirty infeasible in Bret Harte for effectively reducing VMT.[16]

Measure Seven of Policy One of the Circulation Element is not a mitigation measure.[17] It is a measure to study the impact that new transportation would have. The County can assume that rezoning for 489 units of housing in a single concentrated area without anything other than residential neighborhoods nearby, or a sufficent established public transport network, will have an impact on transportation and thus VMT.

Measure Fourteen of Policy Two of the Circulation Element is ineffective for mitigating the VMT in an extremely dense residential neighborhood, with no necessary amenities nearby, for the same reasons as Land Use Policies Twenty-nine and Thirty.[18]

The Draft EIR states that there will be no change in greenhouse gas emissions for zoning projects.[19] The reason being that site zoning is only speculative and there are no actual operational emissions.[20] The Draft EIR then goes on to state measures that are being taken to

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[13] Fourth Draft at 5-16–5-18.
[14] Assuming an average of 1 car per household, 489 households, and a weekly trip to the nearest grocery store, which is 2.5 miles away; the proposed rezoning would add 61,125 VMT. This does not include trips to other necessary amenities which are even farther away. It also does not include the distance necessary to travel to work.
[15] Department of Planning and Community Development, 2015 Final Environmental Impact Report, 2-4 (found at FinalEIR.pdf); Department of Planning and Community Development, 2016 Land Use Element, I-17 (found at Microsoft Word - Chapter I - Land Use (hereinafter Land Use Element).
[16] Land Use Element at I-17.
[17] Department of Planning and Community Development, 2016 Circulation Element, II-29 (found at Microsoft Word - Chapter II - Circulation) (hereinafter Circulation Element).
[18] Circulation Element at II-31.
[19] Department of Planning and Community Development, 2016 Draft Environmental Impact Report, 3.7-17 (found at DraftEIR.pdf) (hereinafter Draft EIR).
[20] Id.

mitigate Greenhouse Gases under the conditions understood at that time.[21] There must be some speculation to properly create the mitigation measures for future development. The County can speculate that its zoning practice may cause a change in the effectiveness of the mitigation measures. The VMT mitigation measures may be ineffective under the current zoning practice because of the high density of residential zones near no necessary amenities, particularly in Bret Harte. Generally, the County has mitigated greenhouse gases by promoting the use of transportation alternative to single driver cars.[22] We are concerned that there will be no alternative to the use of single-drive cars in a zone of high density with no necessary amenities nearby and that has insufficient public transportation. The County must prepare an SEIR showing how their established mitigation measures will be effective in areas such as Bret Harte.

The County's previous mitigation measures did not assume such a high density of housing in an overwhelmingly residential area. The proposed rezoning in Bret Harte exceeds the expectations of the EIR, as is made clear by the ineffectiveness of proposed VMT greenhouse gas emissions mitigation. The Implementation Package will increase the severity of the previously identified greenhouse gas emissions due to the rezone in Bret Harte. The County needs to prepare an SEIR, in part, because of the new circumstances in Bret Harte.

ii. The proposed rezones will significantly exacerbate existing strain on public services and other local resources and a Supplemental EIR must be created imposing conditions to mitigate these negative effects.

The neighborhoods of Bret Harte, Bystrom, South Ceres, Spencer Marshall, and other areas identified for rezones in the Implementation Package are all areas with a severe and well-known lack of access to public services. The proposed rezoning of these areas to include significant additional residential development will exacerbate these neighborhoods' existing levels of resource deficiency by spreading the resources available to these communities even thinner than before. It is irresponsible to allow the rezoning of these communities without conducting a Supplemental EIR to allow a process wherein conditions can be implemented to mitigate strain on local environmental resources.

b. The County must create a Supplemental EIR to address the circumstances that have substantially changed in the almost 10 years since the previous EIR was created.

A supplemental EIR is needed to address the new environmental circumstances of a world that has been substantially affected by climate change. In the almost 10 years since the EIR was created, climate change has generated significant changes to the environmental circumstances of Stanislaus County, as it has for the rest of the Central Valley and the world. The implementation of mitigation measures is more important now than ever before, as climate change is increasingly impacting the lives of all residents and particularly of marginalized and lower income communities who reside and will reside in these rezone sites and the surrounding

[21] Id. at 3.7-18–3.7-19.
[22] Id.

areas. The County needs to establish modern, informed mitigation efforts to combat the effects of climate change.

Fourteen of the top twenty most destructive wildfires in California have occurred since the EIR was created.[23] This shows an increase in serious wildfire risk. New and worsening wildfire risk is an important circumstance to take into consideration in an EIR. These wildfires, in combination with the many others occurring across North America and the world, have contributed to significant, persistent air quality degradation.[24] The fact that air quality is being degraded so broadly makes the inclusion of more extreme measures to mitigate air quality degradation locally even more important. The County needs to prepare an SEIR that considers the more severe air quality degradation that is universally occurring.

There have also been changes in water quality since the 2016 EIR was created. At a minimum there were projections of when certain contaminants would come within acceptable Total Maximum Daily Loads.[25] This is a significant environmental circumstance that the County should update in an SEIR.

The environmental circumstances of California have substantially changed since the County's EIR was created. The County needs to address these substantial changes in an SEIR.

* * *

To ensure that low-income families are not subjected to disproportionate and significantly increased environmental harms, it is critical for the County to conduct a Supplemental EIR to address the environmental impacts of its proposed rezoning to accomplish its Sites Inventory housing unit allocation. This Supplemental EIR must be created after the County has developed a Sites Inventory that sufficiently complies with Fair Housing and Housing Element law.

CRLA appreciates the opportunity to comment on this Implementation Package and the time and energy County staff have devoted throughout the Housing Element and related processes. We would be happy to engage with the County further to discuss this and other Housing Element related topics, and we look forward to continued collaboration.

Respectfully,

Nick Jensen
Unincorporated Community Justice Program Managing Attorney
California Rural Legal Assistance, Inc.

Kyler Casper
Unincorporated Community Justice Program Legal Intern
California Rural Legal Assistance, Inc.

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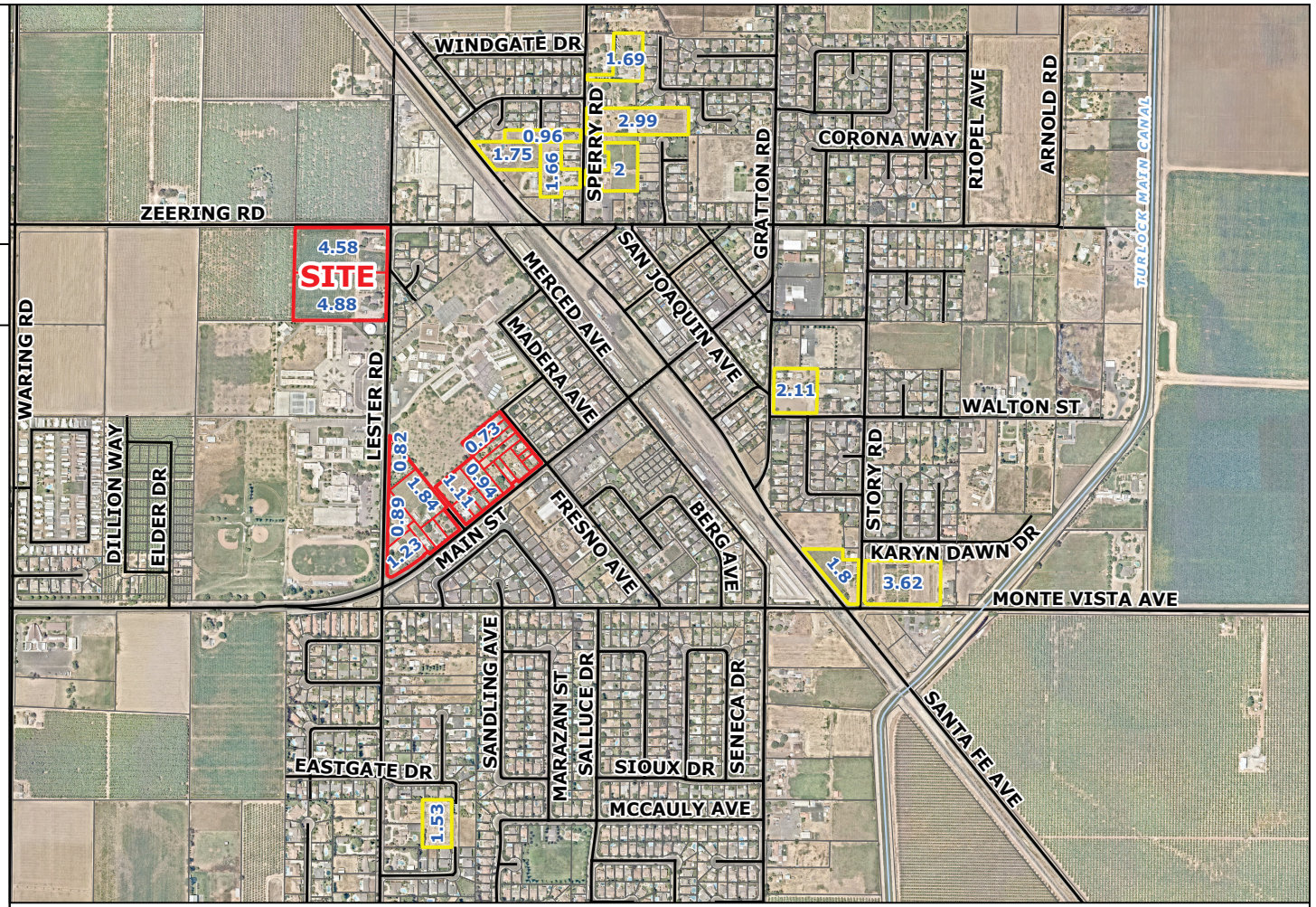
[23] CalFire, Top 20 Most Destructive California Wildfires, (July, 25, 2025) (found at top20_destruction_072525.pdf)
[24] Wei et al., *Medium-term Exposure to Wildfire Smoke $PM_{2.5}$ and Cardiorespiratory Hospitalization Risks*, Epidemiology (September 2025). (Found at 10.1097/EDE.0000000000001881).
[25] EIR at 3.9-11–3.9-12.

6TH CYCLE HOUSING

GPA REZ OA ODS PLN2025-0053

2023 AERIAL AREA MAP



LEGEND

- Parcel
- Street
- Canal
- Rezone Sites
- CRLA Recommended Rezone Sites

N

0 750 1,500 Feet

0 190 380 Meters

Source: Planning Department GIS Date Exported: 9/29/2025

EXHIBIT I

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
651 Bannon Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

September 29, 2025

Angela Freitas, Director
Planning and Community Development Department
Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354

Dear Angela Freitas:

RE: Stanislaus County's 6th Cycle (2023-2031) Revised Draft Housing Element

Thank you for submitting Stanislaus County's (County) revised draft housing element that was received for review on July 31, 2025, along with revisions received on September 25, 2025. The revisions were posted on the County's website and made available to the public for seven days prior to review. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on September 22, 2025 with County staff and your consultants. In addition, HCD considered comments from California Rural Legal Assistance and Chief Peter Golling of the Burbank Paradise Fire Department pursuant to Government Code section 65585, subdivision (c).

The revised draft element, including revisions, meets the statutory requirements described in HCD's April 4, 2025 review. However, the housing element cannot be found in substantial compliance until the County has completed and submitted the necessary rezones (see below) to accommodate the Regional Housing Needs Allocation (RHNA). The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq) when rezoning is completed and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

A jurisdiction that did not adopt a compliant housing element within 120 days from the statutory deadline (December 31, 2023) must rezone sites within one year of the statutory deadline and meet requirements pursuant to Government Code sections 65583, subdivision (c)(1)(A) and 65583.2, subdivisions (c), (h) and (i), as applicable. As this year has passed and Programs 3-1g (Shortfall Rezoning) and 3-4a (Prior Identified Sites) have not been completed to meet all statutory requirements, the housing element is out of compliance and will remain out of compliance until the rezoning has been completed and submitted to HCD to meet all statutory requirements. Once the County

completes the rezoning, a copy of the resolution or ordinance should be transmitted to HCD. HCD will review the documentation and issue correspondence updating the status of the County's housing element compliance.

As a reminder, the County's 6th cycle housing element was due December 31, 2023. As of today, the County has not completed the housing element process for the 6th cycle. The County's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the County to expeditiously complete rezoning, adopt, and submit to HCD to regain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the County must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. The County should ensure that information is shared consistently through a variety of outreach methods and that public input is meaningfully considered and incorporated where appropriate. Commenters on this review, particularly California Rural Legal Assistance, provided meaningful suggestions. HCD encourages the County to continue working with the public, including commenters on this housing element review, and adjust policies and programs, as appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Pursuant to Government Code section 65583.3, subdivision (b), the County must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the sites inventory. While the County has submitted an electronic version of the sites inventory, if changes occur or have occurred since submittal, any future adopted versions of the element must also submit the electronic version of the sites inventory.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities programs, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the County will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Land Use and Climate Innovation: https://www.lci.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the efforts of the housing element update team during the update and review. HCD looks forward to receiving the County's adopted housing element and welcomes the opportunity to provide technical assistance during the rezoning process. If you have any questions or need additional technical assistance, please contact Emily Hovda, of our staff, at Emily.Hovda@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

STANISLAUS COUNTY
DEPARTMENT OF PLANNING AND
COMMUNITY DEVELOPMENT
1010 10th Street, Suite 3400
Modesto, California 95354

NOTICE OF EXEMPTION

Project Title: General Plan Amendment Application No. PLN2022-0045 – Sixth Cycle Housing Element

Applicant Information: Stanislaus County Department of Planning and Community Development, 1010 10th Street, Ste. 3400, Modesto CA 95354

Telephone: (209) 525-6330

Project Location: Unincorporated County-wide.

Description of Project: Request to update and amend the Housing Element of the Stanislaus County General Plan, covering the period from January 2023 through December 2031.

Name of Agency Approving Project: Stanislaus County Board of Supervisors

Lead Agency Contact Person: Kristy Doud, Deputy Director of Planning **Telephone:** (209) 525-6330

Exempt Status: (check one)

- ☐ Ministerial (Section 21080(b)(1); 15268);
- ☐ Declared Emergency (Section 21080(b)(3); 15269(a));
- ☐ Emergency Project (Section 21080(b)(4); 15269(b)(c));
- ☐ Categorical Exemption. State type and section number: _____
- ☐ Statutory Exemptions. State code number: _____
- ☒ Common Sense Exemption. 15061 (b)(3)

Reasons why project is exempt: The document is a long-range planning document which provides guidance for policies and programs that will not directly lead to development.

_____ _____
Dated Kristy Doud
Deputy Director of the Planning Division

DISTRIBUTION LIST FOR NOTICE OF DOCUMENT AVAILABILITY AND NOTICE OF PUBLIC HEARING

PROJECT: GPA PLN2022-0045 - SIXTH CYCLE HOUSING ELEMENT UPDATE

REFERRED TO:			RESPONDED		RESPONSE		
	NODA	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA
AIRPORT LAND USE COMMISSION	X	X	X				X
ANIMAL SERVICES	X	X		X			
AT&T	X	X		X			
BERTOLOTTI DISPOSAL DISTRICT	X	X		X			
BOARD OF SUPERVISORS	X	X	X				X
BURBANK-PARADISE FIRE DIST	X	X	X			X	
BURLINGTON NORTHERN / SANTA FE RAILROAD	X	X		X			
CA BUILDING ASSOCIATION	X	X	X				X
CA DEPT OF CONSERVATION	X	X		X			
CA DEPT OF FISH AND WILDLIFE	X	X		X			
CA DEPT OF FORESTRY	X	X		X			
CA DEPT OF HOUSING & COMMUNITY DEVELOPMENT	X	X	X				X
CA DEPT OF JUSTICE	X	X	X				X
CA DEPT OF TRANSPORTATION	X	X		X			
CA NORTHERN RAILROAD	X	X		X			
CA OPR STATE CLEARINGHOUSE	X	X	X				X
CA RURAL LEGAL ASSISTANCE	X	X	X			X	
CA RWQCB CENTRAL VALLEY REGION	X	X	X				X
CA STATE LANDS COMMISSION	X	X		X			
CA SWRCB	X	X		X			
CALAVERAS COUNTY PLANNING	X	X		X			
CALIFORNIA VALLEY MIWOK TRIBE	X	X		X			
CENTRAL CALIFORNIA IRRIGATION DISTRICT	X	X		X			
CENTRAL VALLEY FLOOD PROTECTION BOARD	X	X		X			
CERES FIRE PROTECTION DIST	X	X		X			
CERES UNIFIED SCHOOL DIST	X	X		X			
CHATOM UNION SCHOOL DIST	X	X		X			
CITY OF CERES	X	X	X				X
CITY OF ESCALON	X	X		X			
CITY OF GUSTINE	X	X		X			
CITY OF HUGHSON	X	X		X			
CITY OF MODESTO	X	X	X				X
CITY OF NEWMAN	X	X		X			
CITY OF OAKDALE	X	X	X				X
CITY OF PATTERSON	X	X		X			
CITY OF RIVERBANK	X	X		X			
CITY OF TURLOCK	X	X		X			
CITY OF WATERFORD	X	X		X			
COMMUNITY SERVICES AGENCY (CSA)	X	X	X				X
COOPOERATIVE EXTENSION	X	X		X			
CROWS LANDING CSD	X	X		X			
DEL PUERTO HOSPITAL DIST	X	X		X			
DEL PUERTO WATER DIST	X	X		X			
DENAIR CSD	X	X	X				X
DENAIR FIRE DIST	X	X		X			
DENAIR MAC	X	X	X				X
DENAIR POST OFFICE	X	X		X			
DENAIR UNIFIED SCHOOL DIST	X	X		X			
DM-II GSA	X	X		X			
EAST SIDE MOSQUITO ABATEMENT DIST	X	X		X			
EAST TURLOCK SUBBASIN GSA	X	X		X			
EASTERN SAN JOAQUIN GROUNDWATER AUTHORITY	X	X		X			
EASTIN WATER DIST	X	X		X			
EASTSIDE SAN JOAQUIN GSA	X	X		X			

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	NODA	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA
EASTSIDE WATER DIST	X	X		X			
EL SOLYO WATER DIST	X	X		X			
EMPIRE MAC	X	X	X				X
EMPIRE UNION SCHOOL DIST	X	X		X			
GILTON SOLID WASTE MANAGEMENT INC.	X	X		X			
GRATTON SCHOOL DIST	X	X		X			
GRAYSON CSD	X	X		X			
HART RANSOM UNION SCHOOL DIST	X	X		X			
HICKMAN COMMUNITY CHARTER DIST	X	X		X			
HICKMAN MAC	X	X		X			
HILLS FERRY CEMETERY DIST	X	X		X			
HUGHSON FIRE DIST	X	X		X			
HUGHSON UNIFIED SCHOOL DIST	X	X		X			
INDUSTRIAL FIRE DIST	X	X		X			
INTERESTED PARTIES	X	X	X				X
KEYES CSD	X	X	X				X
KEYES FIRE DIST	X	X		X			
KEYES MAC	X	X	X				X
KEYES POSTMASTER	X	X		X			
KEYES UNION SCHOOL DIST	X	X		X			
KNIGHTS FERRY CEMETERY DIST	X	X		X			
KNIGHTS FERRY CSD	X	X		X			
KNIGHTS FERRY ELEMENTARY SCHOOL DISTRICT	X	X		X			
KNIGHTS FERRY MAC	X	X		X			
LOCAL AREA FORMATION COMMISSION	X	X	X				X
MAC COMMUNITY MANAGER	X	X		X			
MARIPOSA COUNTY PLANNING	X	X		X			
MERCED COUNTY PLANNING	X	X		X			
MODESTO & EMPIRE TRACTION CO	X	X		X			
MODESTO CITY SCHOOL DIST	X	X		X			
MODESTO FIRE PREVENTION	X	X		X			
MODESTO IRRIGATION DIST GENERAL SERVICES	X	X	X				X
MODESTO POSTMASTER	X	X		X			
MONTEREY PARK TRACT CSD	X	X					
MOUNTAIN VIEW FIRE DIST	X	X		X			
NEWMAN FIRE DEPARTMENT	X	X		X			
NEWMAN-CROWSLANDING SCHOOL DIST	X	X		X			
NORTHERN VALLEY YOKUT OHLONE TRIBE	X	X		X			
NORTHERN VALLEY YOKUT TRIBE	X	X		X			
NORTHWESTERN DELTAT-MENDOTA GSA	X	X		X			
OAK FLAT WATER DIST	X	X		X			
OAK VALLEY HOSPITAL DIST	X	X		X			
OAKDALE IRRIGATION DIST	X	X	X				X
OAKDALE JOINT UNIFIED SCHOOL DIST	X	X		X			
OAKDALE RURAL FIRE DIST	X	X		X			
PARADISE SCHOOL DIST	X	X		X			
PARKLAWN UNITED NEIGHBORS	X	X	X				X
PATTERSON CEMETERY DIST	X	X		X			
PATTERSON FIRE DEPARTMENT	X	X		X			
PATTERSON IRRIGATION DIST	X	X		X			
PATTERSON IRRIGATION DISTRICT	X	X		X			
PATTERSON JOINT UNIFIED SCHOOL DIST	X	X		X			
PATTERSON POSTMASTER	X	X		X			
PG&E	X	X		X			

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PROJECT: GPA PLN2022-0045 - SIXTH CYCLE HOUSING ELEMENT UPDATE

REFERRED TO:			RESPONDED		RESPONSE		
	NODA	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA
RISK MANAGEMENT	X	X		X			
RIVERBANK UNIFIED SCHOOL DIST	X	X		X			
RIVERDALE PARK TRACT CSD	X	X		X			
ROBERTS FERRY ELEMENTARY SCHOOL	X	X		X			
ROCK CREEK WATER DIST	X	X		X			
S SAN JOAQUIN IRRIGATION DIST	X	X		X			
SAGE INSTITUTE, INC.	X	X		X			
SALIDA FIRE PROTECTION DIST	X	X	X			X	
SALIDA MAC	X	X	X				X
SALIDA SANITARY DIST	X	X		X			
SALIDA UNION SCHOOL DIST	X	X		X			
SAN JOAQUIN COUNTY PLANNING	X	X		X			
SAN JOAQUIN COUNTY PUBLIC WORKS	X	X		X			
SAN JOAQUIN RIVER EXCHANGE CONTRACTORS WATER AUTHORITY GSA	X	X		X			
SAN JOAQUIN VALLEY APCD	X	X		X			
SAN LUIS & DELTA-MENDOTA WATER AUTHORITY	X	X		X			
SANTA CLARA COUNTY ROADS & AIRPORTS PLANNING DIVISION	X	X		X			
SHILOH SCHOOL DIST	X	X		X			
SELF-HELP ENTERPRISES	X	X	X				X
SIERRA NORTHERN RAILROAD	X	X		X			
SOLID WASTE	X	X		X			
SOUTH MODESTO MAC	X	X	X				X
SOUTH MODESTO BUSINESSES UNITED	X	X	X				X
SOUTHERN SIERRA MIWUK NATION	X	X		X			
STAN AND TUOLUMNE RIVERS GROUNDWATER BASIN ASSOC	X	X		X			
STAN COUNTY AG COMM	X	X		X			
STAN COUNTY BEHAVIORAL HEALTH	X	X		X			
STAN COUNTY CHIEF EXEC OFFICE	X	X		X			
STAN COUNTY COMMUNITY SERVICES AGENCY	X	X	X				X
STAN COUNTY COUNTY COUNSEL	X	X		X			
STAN COUNTY DEPT OF ENV RESOURCES	X	X	X				X
STAN COUNTY DEPT OF PLANNING AND CD - Building Permits	X	X		X			
STAN COUNTY GENERAL SERVICES AGENCY	X	X		X			
STAN COUNTY PARKS AND REC	X	X		X			
STAN COUNTY SHERIFF	X	X		X			
STAN FIRE PREVENTION BUREAU	X	X		X			
STANCOG	X	X		X			
STANISLAUS CONSOLIDATED FIRE PROTECTION DIST	X	X		X			
STAN COUNTY WORKFORCE DEVELOPMENT	X	X		X			
STANISLAUS COUNTY EMERGENCY MEDICAL SERVICES AGENCY	X	X		X			
STANISLAUS COUNTY FARM BUREAU	X	X		X			
STANISLAUS COUNTY PUBLIC WORKS	X	X		X			
STANISLAUS COUNTY PUBLIC WORKS - SURVEY	X	X		X			
STANISLAUS EQUITY PARTNERS	X	X		X			
STANISLAUS UNION SCHOOL DIST	X	X		X			
SURROUNDING LANDOWNERS	X	X	X				X
SYLVAN UNION SCHOOL DIST	X	X		X			
TULE RIVER INDIAN TRIBE	X	X		X			
TUOLUMNE BAND OF ME-WUK	X	X		X			
TUOLUMNE COUNTY PLANNING	X	X		X			
TUOLUMNE RIVER PRESERVATION TRUST	X	X		X			
TURLOCK FIRE DEPARTMENT	X	X		X			

DISTRIBUTION LIST FOR NOTICE OF DOCUMENT AVAILABILITY AND NOTICE OF PUBLIC HEARING

PROJECT: GPA PLN2022-0045 - SIXTH CYCLE HOUSING ELEMENT UPDATE

REFERRED TO:			RESPONDED		RESPONSE		
	NODA	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA
TURLOCK IRRIGATION DISTRICT	X	X		X			
TURLOCK MOSQUITO ABATEMENT DIST	X	X		X			
TURLOCK RURAL FIRE DIST	X	X		X			
TURLOCK SCAVENGER	X	X		X			
TURLOCK UNIFIED SCHOOL DIST	X	X		X			
UNION PACIFIC RAILROAD	X	X		X			
US ARMY CORPS OF ENGINEERS	X	X		X			
US FISH AND WILDLIFE	X	X		X			
USDA NRCS SERVICE CENTER	X	X		X			
VALLEY IMPROVEMENT PROJECT	X	X	X				X
VALLEY HOME JOINT SCHOOL DIST	X	X		X			
VALLEY HOME MAC	X	X		X			
W SIDE COMMUNITY HEALTHCARE DIST	X	X		X			
W STANISLAUS FIRE DIST	X	X		X			
W STANISLAUS IRRIGATION DIST	X	X		X			
WATERFORD SCHOOL DIST	X	X		X			
WEST MODESTO COMMUNITY COLLABORATIVE	X	X	X				X
WEST TURLOCK SUBBASIN GSA	X	X		X			
WESTERN HILLS WATER DIST	X	X		X			
WESTLEY CSD	X	X		X			
WESTPORT FIRE DIST	X	X		X			
WOOD COLONY MAC	X	X		X			
WOODLAND AVE FIRE DIST	X	X		X			

GPA PLN2022-0045 – SIXTH CYCLE HOUSING ELEMENT UPDATE

Planning Commission – October 16, 2025

Source: Stanislaus County Affordable Housing Corporation

Project Request

Review and recommendation regarding adoption of:

- A request to update and amend the Housing Element of the Stanislaus County General Plan, covering the period from January 2023 through December 2031
- CEQA Common Sense Exemption

6th Cycle Housing Element Update

Source: Stanislaus County Affordable Housing Corporation

What is a Housing Element?

- One of seven elements in the County's General Plan
- The Housing Element is required by State law to be updated every eight years

What does a Housing Element do?

- Identifies current and future housing needs
- Identifies barriers and opportunities
- Establishes an action plan
- A Housing Element encourages residential development but does NOT require development to be occur

Organization of the Housing Element:

- Executive Summary
- Chapter 1—Introduction
- Chapter 2—Housing Needs Assessment
- Chapter 3—Housing Constraints
- Chapter 4—Affirmatively Furthering Fair Housing
- Chapter 5—Housing Resources
- Chapter 6—Housing Plan
- Appendix A—Summary of Public Participation
- Appendix B—Review of Past Accomplishments
- **Appendix C—Sites Inventory**

Housing Element Basics

- Demographics
- Housing stock characteristics
- Affirmatively Furthering Fair Housing Analysis

- Governmental constraints
- Non-governmental constraints
- Zoning for a variety of housing types

- Goals, policies, and implementation programs to address housing needs, constraints, and AFFH.

- Projected housing needs and RHNA requirements
- Housing sites inventory
- Housing preservation
- Opportunities for energy conservation

Sixth Cycle

- Spans the years 2023 – 2031
- Significant changes to sixth cycle requirements
- Regional Housing Needs Allocation (RHNA) – Adopted by StanCOG August 17, 2022
- Deadline for Adoption – December 31, 2023 (extended to April 30, 2024)

Community Engagement

Public Noticing

- Bilingual materials
- Flyers
- Social Media
- Email Lists
- Letters to Property Owners

Community Events

- Popup Events (April and May 2025)
- Community Workshop (October 2022)

Online Outreach

- Community Survey (August 2022)
- Virtual Workshop (June 2022)
- Participatory Mapping Exercise
- Project Website

Interviews

- Stakeholder interviews with local housing developers, agencies, and housing and community health advocates (October 2022)

Presentations

- General Plan Update Committee (April and August 2023, December 2024)
- Planning Commission (July 2022)
- Municipal Advisory Councils (September and October 2023)

Public Review

- September 2023
- January 2024
- January 2025
- March 2025
- July 2025
- September 2025
- Notices to rezone site property owners and surrounding neighbors

Community Input

Public Comment	County Response
Conduct meaningful outreach to gather meaningful feedback	Conducted outreach through various methods (in-person and virtual) to reach various segments of the community
Housing should be located near transit, shopping, and jobs, where there is sewer and water available	Sites Inventory focused on identifying sites that were infill opportunities near transit, jobs, and services
County needs more variety of housing and more flexibility in how housing can be built	Added various actions requiring ordinance amendments to allow for more flexible development standards
Expand analysis of fair housing	Added significant local knowledge pertaining to fair housing and added programs to address identified issues
Analyze and discuss infrastructure availability	Added detailed analysis of infrastructure by community
Tailor programs to address unique needs of communities	Added metrics, milestones, and geographic targeting to programs
Strengthen program actions for special needs populations	Added programs to address identified needs, specifically for farmworkers and extremely low-income households
Revise Sites Inventory to equitably distribute housing units and show breakdown by community	Modified inventory to greater distribute units and added significant detail to the Sites Inventory analysis

Housing Needs Assessment

- Identifies and quantifies the existing and projected housing needs of a community:
  - Housing Stock
    - Older than 50 years – 40%
    - Substandard Housing - 1.6%
  - Special Populations with Unique Housing Needs in the County:
    - Seniors
    - Persons with a Disability
    - Large Households
    - Farmworkers
    - Homeless

Housing Constraints

- Evaluates governmental, non-governmental (market) constraints, and environmental barriers to housing development:
  - Lack of land with water and sewer availability
  - Zoning Code restriction (i.e. Emergency shelter regulations not consistent with State law, allowance for single-family development in high-density district, parking standards)
  - Insufficient land zoned for high-density development

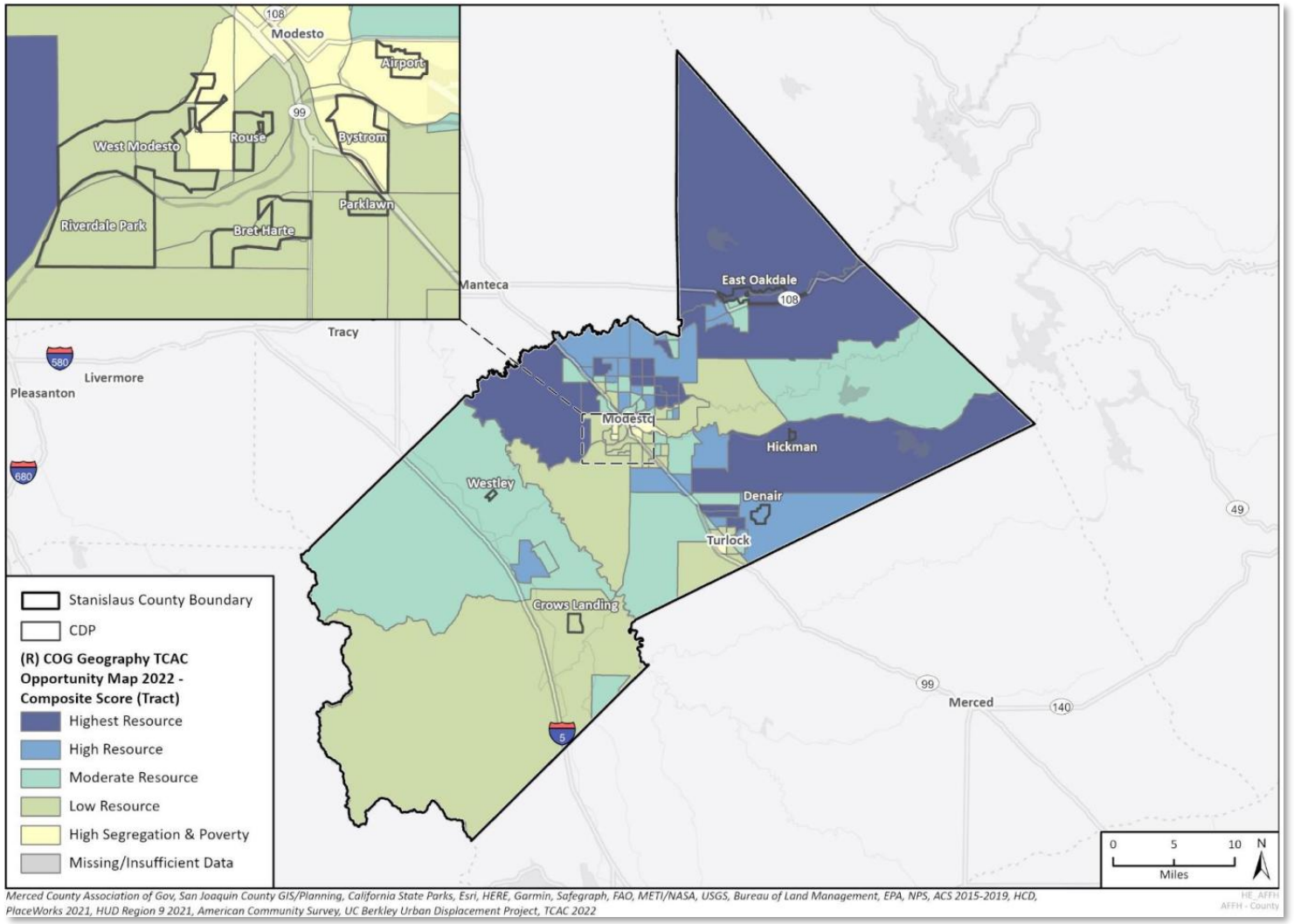
Affirmatively Furthering Fair Housing (AFFH)

- An assessment of fair housing patterns and trends
- housing issues and their contributing factors, enforcement, and outreach capacity
- Evaluates patterns of segregation, disparities in access to opportunity, and disproportionate housing needs to identify barriers to fair housing
- Other factors (such as language barriers or lack of infrastructure)
- Census data (such as race, ethnicity, income)
- Pollution Burden
- Local knowledge

R/ECAPs and RCAAs

- Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)
  - Airport
  - Bret Harte
  - Rouse/Colorado
- Racially Concentrated Areas of Affluence (RCAA)
  - Denair
  - East Oakdale
  - Knights Ferry
  - Valley Home

Opportunity Areas



Affirmatively Furthering Fair Housing (AFFH)

- AFFH Actions
  - Housing or employment mobility
  - Place-based strategies
  - Anti-displacement strategies
  - Community Outreach
  - Fair housing services
  - Geographic targeting
    - Places at high-risk of displacement
    - R/ECAPs and RCAAs
    - High/Low resources areas

Regional Housing Needs Allocation (RHNA)

StanCOG
Stanislaus Council of Governments
2023-2031 RHNA = 34,344 housing units

Waterford 557	Ceres 3,361	Modesto 11,248	Unincorporated County 2,475	Turlock 5,802	Oakdale 1,665	Newman 1,048
		Patterson 3,716	Riverbank 3,591	Hughson 881		

Each jurisdiction must accommodate its "fair share" of the regional housing need.

RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low $24,090-$40,150	Low $40,150-$64,240	$65,043-$96,360	>$96,360	
574	398	458	1,045	2,475

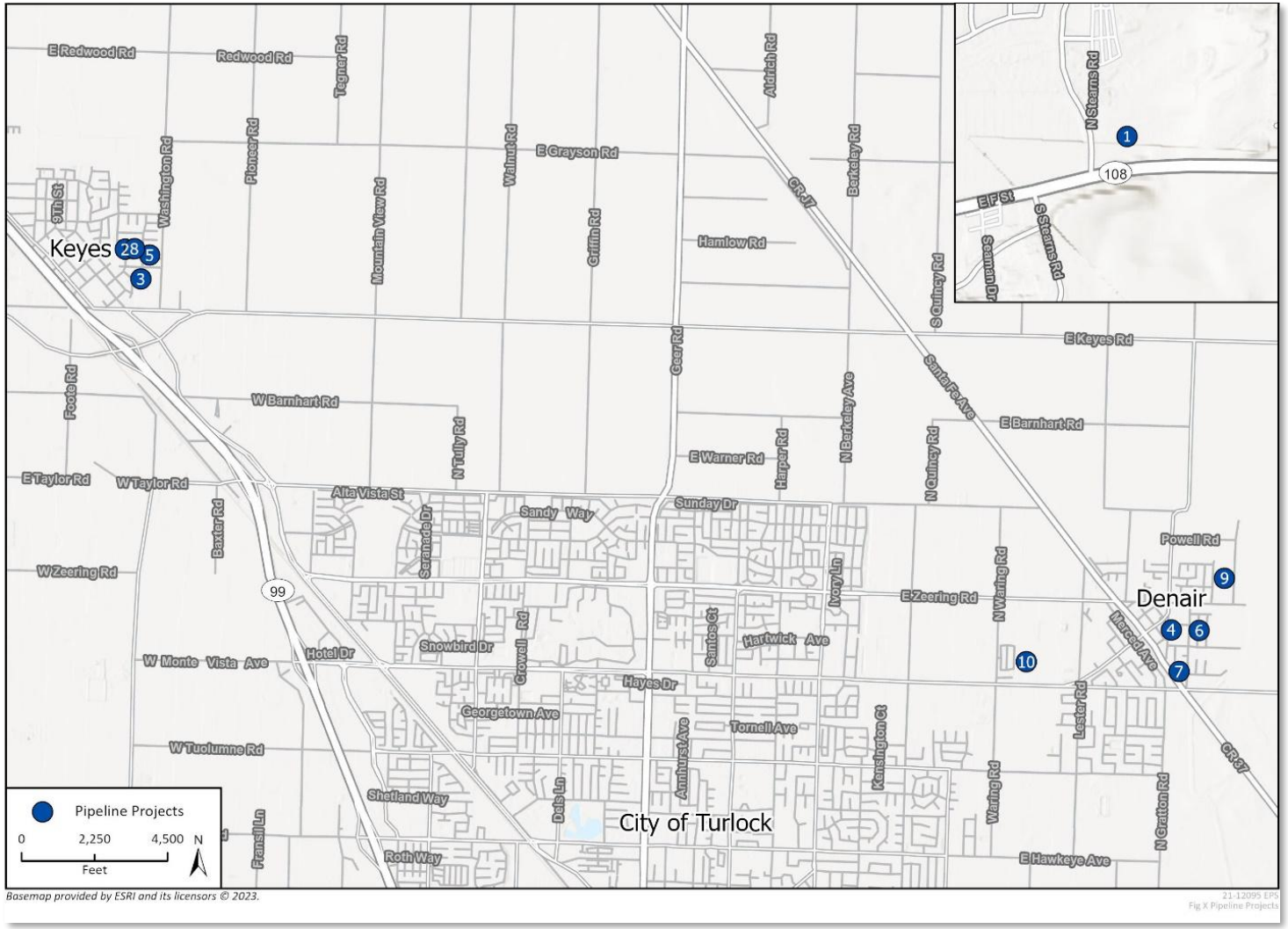
Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate lower-income housing

Meeting the RHNA

	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	972	458	1045	2475
Planned and Approved Units	0	0	252	252
ADUs Anticipated	0	0	184	184
Total Units on Vacant Sites	0	87	493	580
Total Units on Underutilized sites	0	135	225	360
Remaining RHNA	**972**	**236**	**-109**	**1099**

Planned & Approved Projects



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Remaining RHNA	**972**	**236**	**-109**	**1099**

Sites Lower-Income Units

- Requirements:
  - Size: between 0.5 and 10 acres
  - Minimum density of at least 20 units per acre
  - Realistic likelihood of redevelopment
  - Sewer and water availability

- Challenges:
  - Infrastructure availability
  - Availability of adequate land
  - Measure E

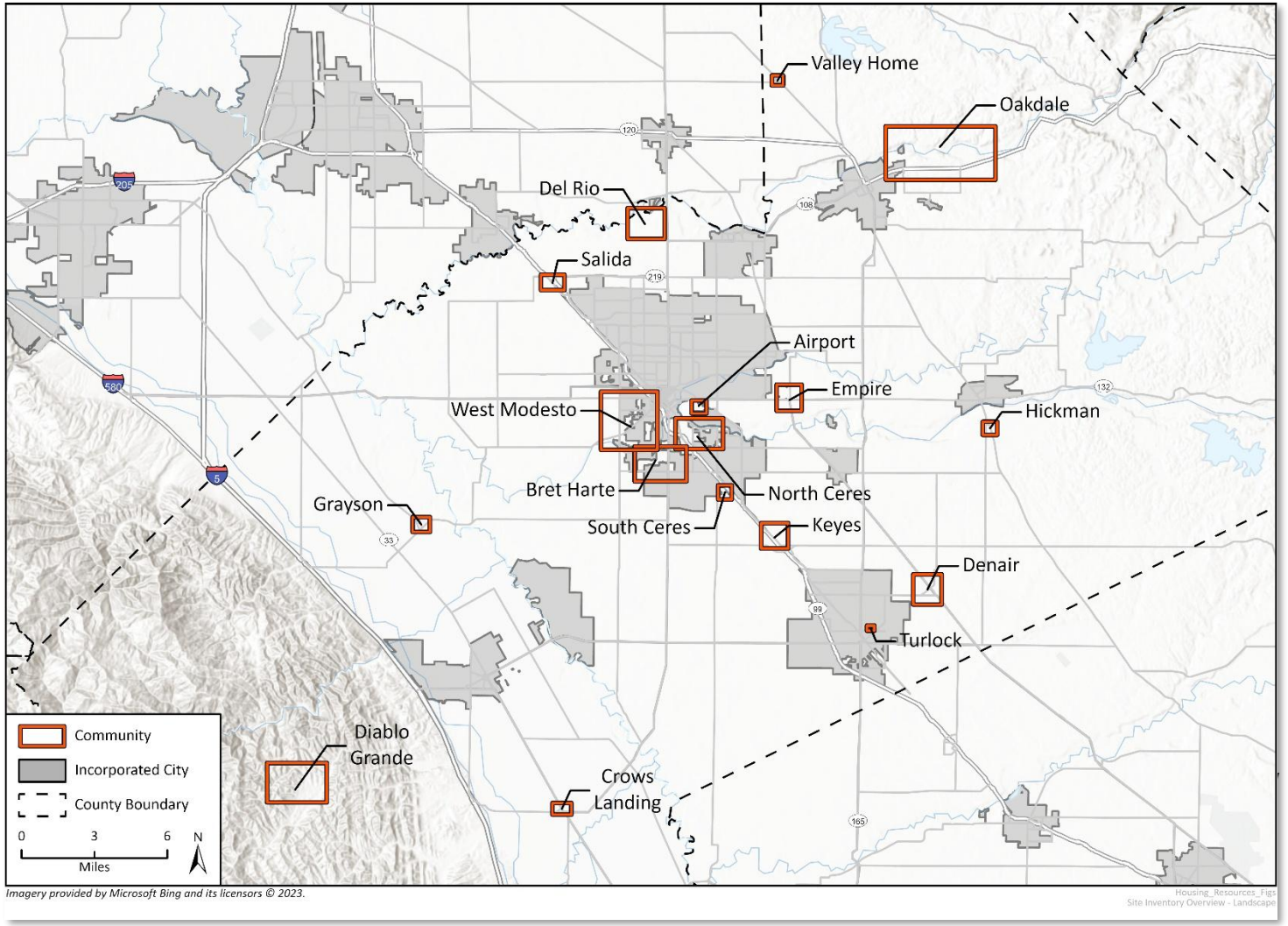
Adequacy of the Sites Inventory

	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Bret Harte	10	29.67	481	101	8	590
Denair	4	12.41	127	13	0	140
Empire	5	4.77	17	46	8	71
Keyes	3	4.45	58	18	2	78
North Ceres	4	7.97	97	18	1	116
Salida	3	1.48	0	18	3	21
South Ceres	1	4.18	76	7	0	83
West Modesto	18	23.44	248	107	15	370
Total	48	88.37	1,104	328	37	1,469

Overview

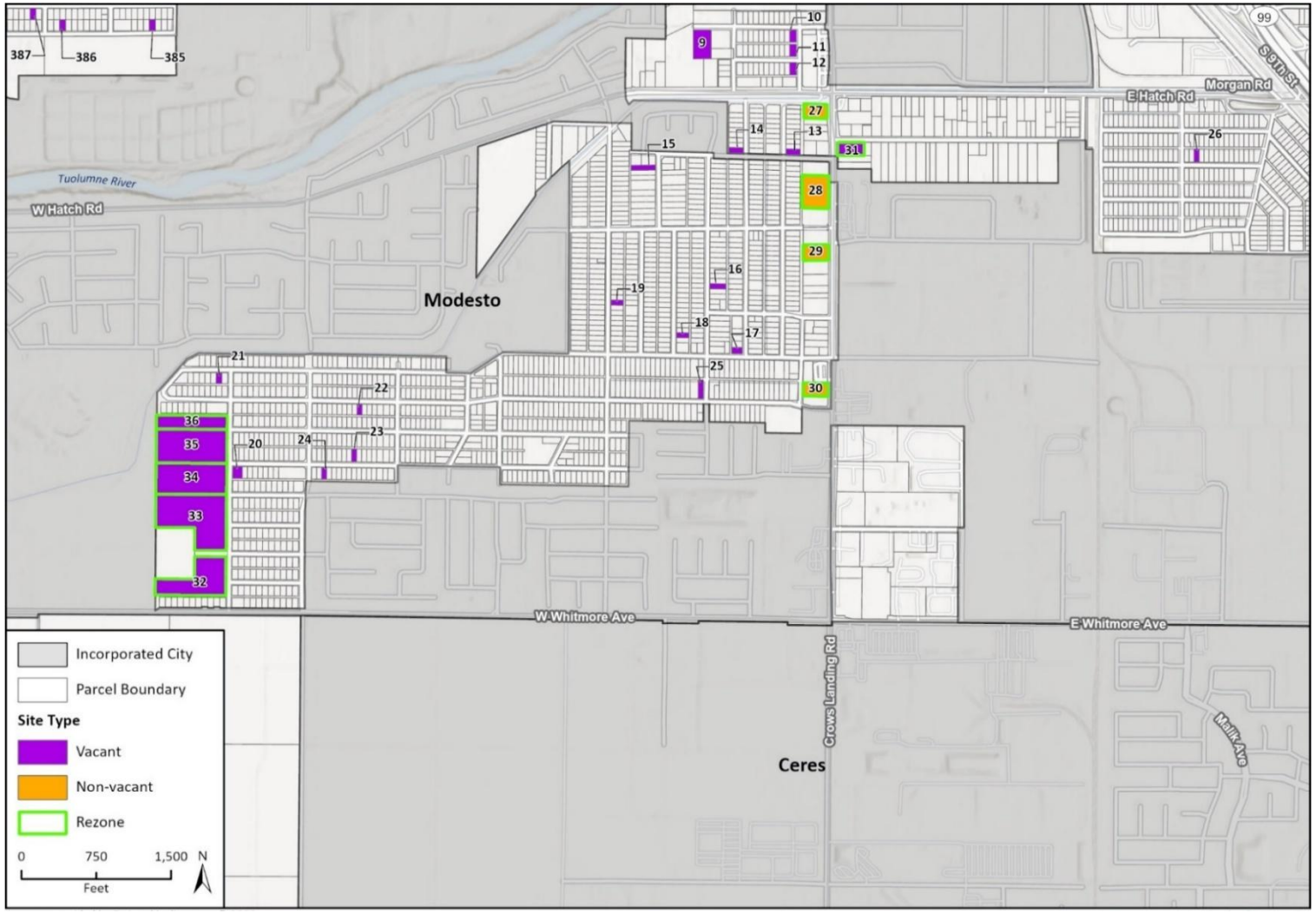
Sites Inventory Areas:

- Airport
- Bret Harte
- Crows Landing
- Del Rio
- Denair
- Diablo Grande
- Empire
- Grayson
- Hickman
- Keyes
- North Ceres
- East Oakdale
- Salida
- South Ceres (Laurel/Central)
- Turlock (Kenwood/Star)
- Valley Home
- West Modesto



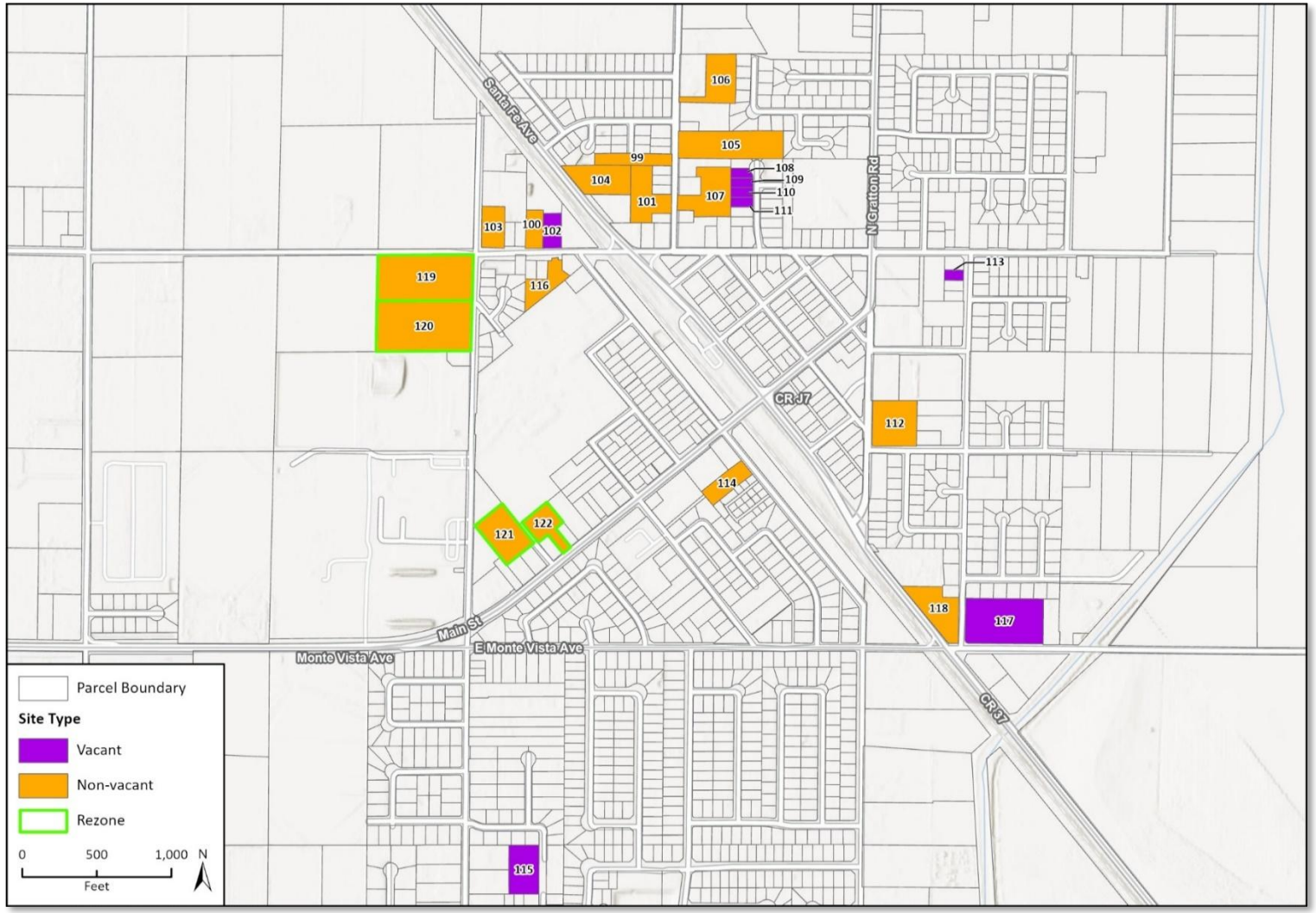
Bret Harte Sites

Category	Number of Parcels	Acreage	Lower-Income	Moderate-Income	Above Moderate-Income	Total
Non-Rezone Sites	18	4.22	0	0	23	23
Rezone Sites	10	29.67	481	101	8	590
Total	28	33.89	481	101	31	613



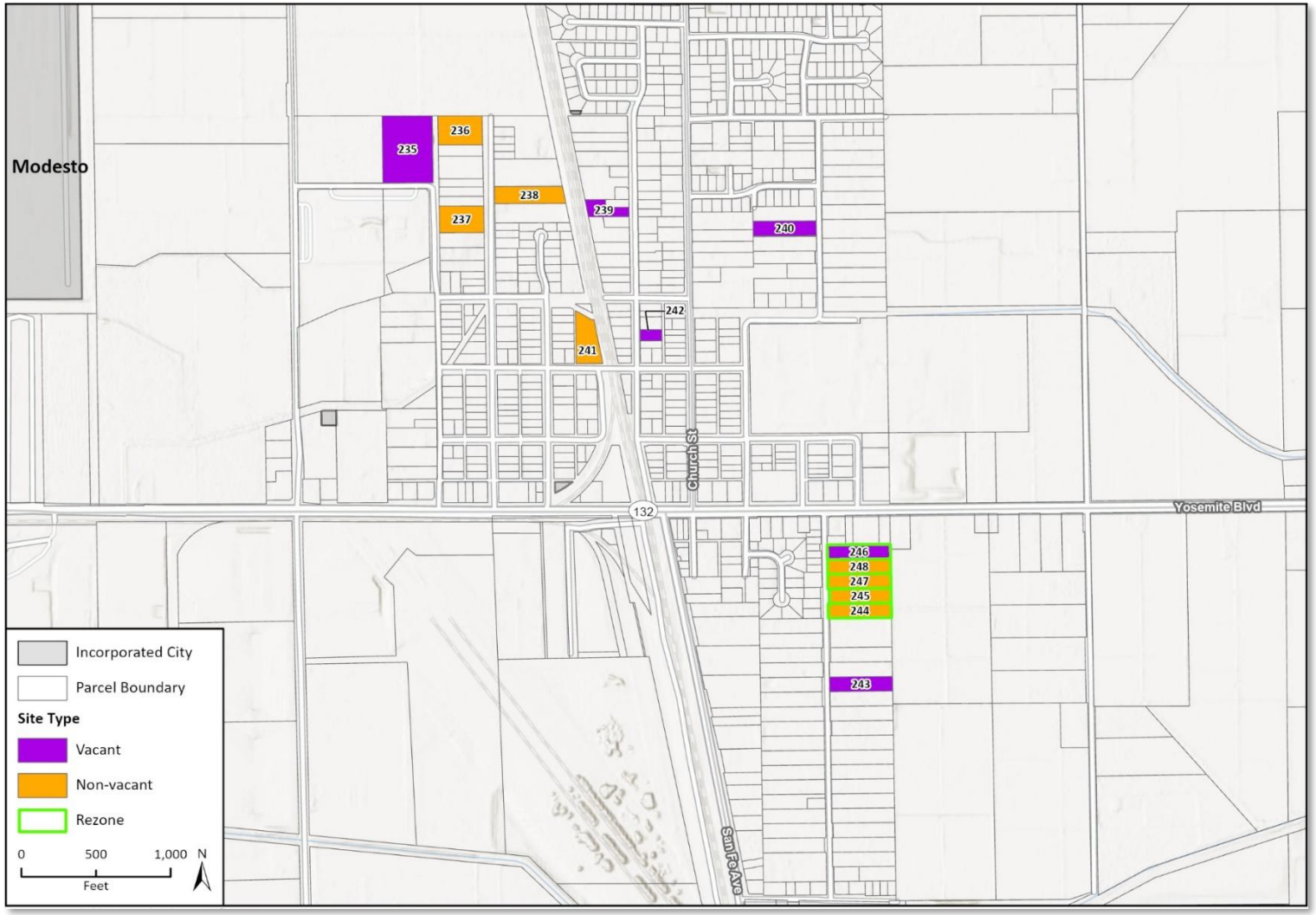
Denair Sites

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	20	25.53	0	26	68	94
Rezoned Sites	4	12.41	127	13	0	140
Total	24	37.94	127	39	93	259



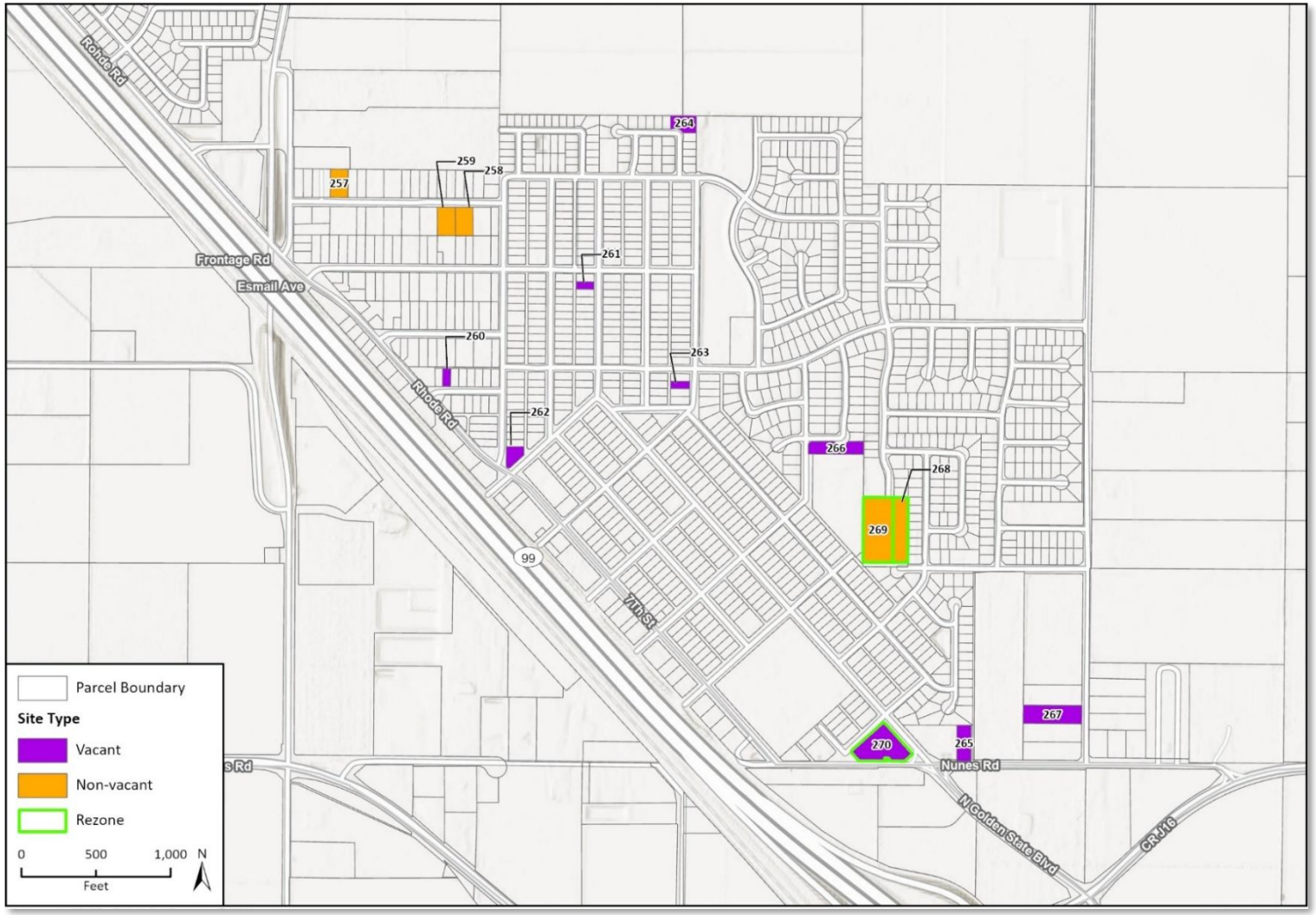
Empire Sites

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	9	11.11	0	0	35	35
Rezoned Sites	5	4.77	17	46	8	71
Total	14	15.88	17	46	43	106



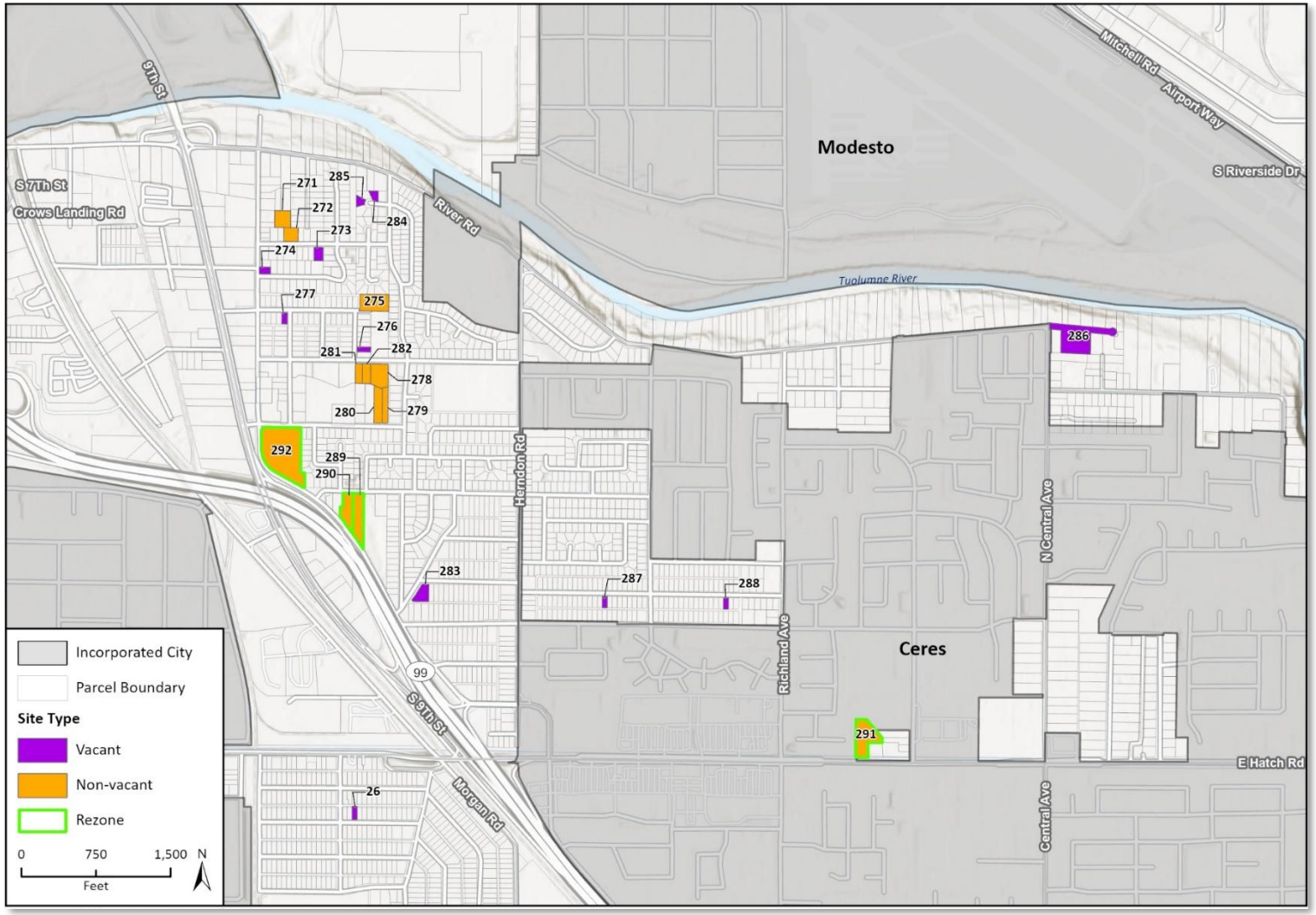
Keyes Sites

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	11	5.05	0	20	16	36
Rezoned Sites	3	4.45	58	18	2	78
Total	14	9.5	58	38	18	114



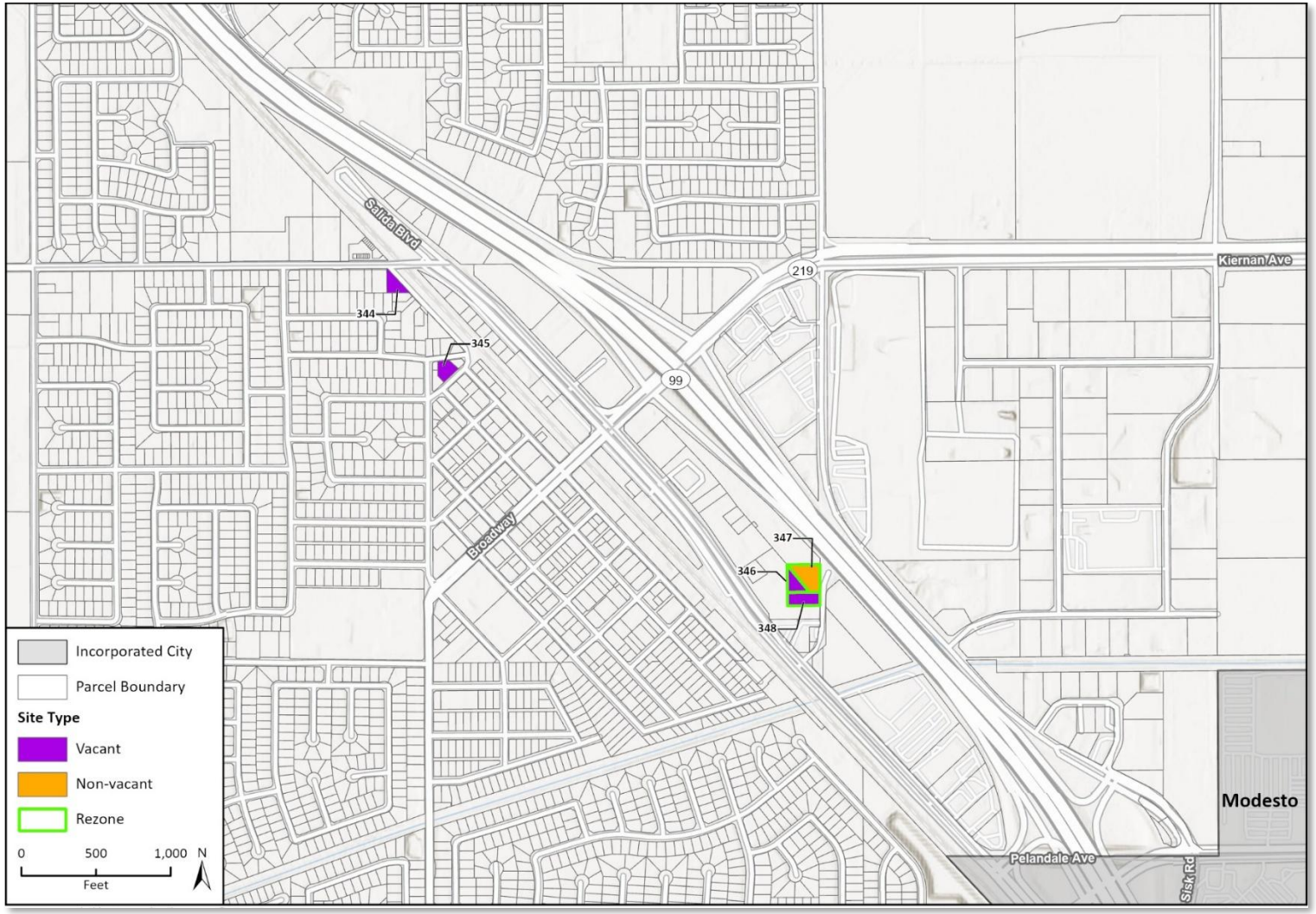
North Ceres Sites

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	18	9.36	0	39	25	64
Rezoned Sites	4	7.97	97	18	1	116
Total	22	17.33	97	57	26	180



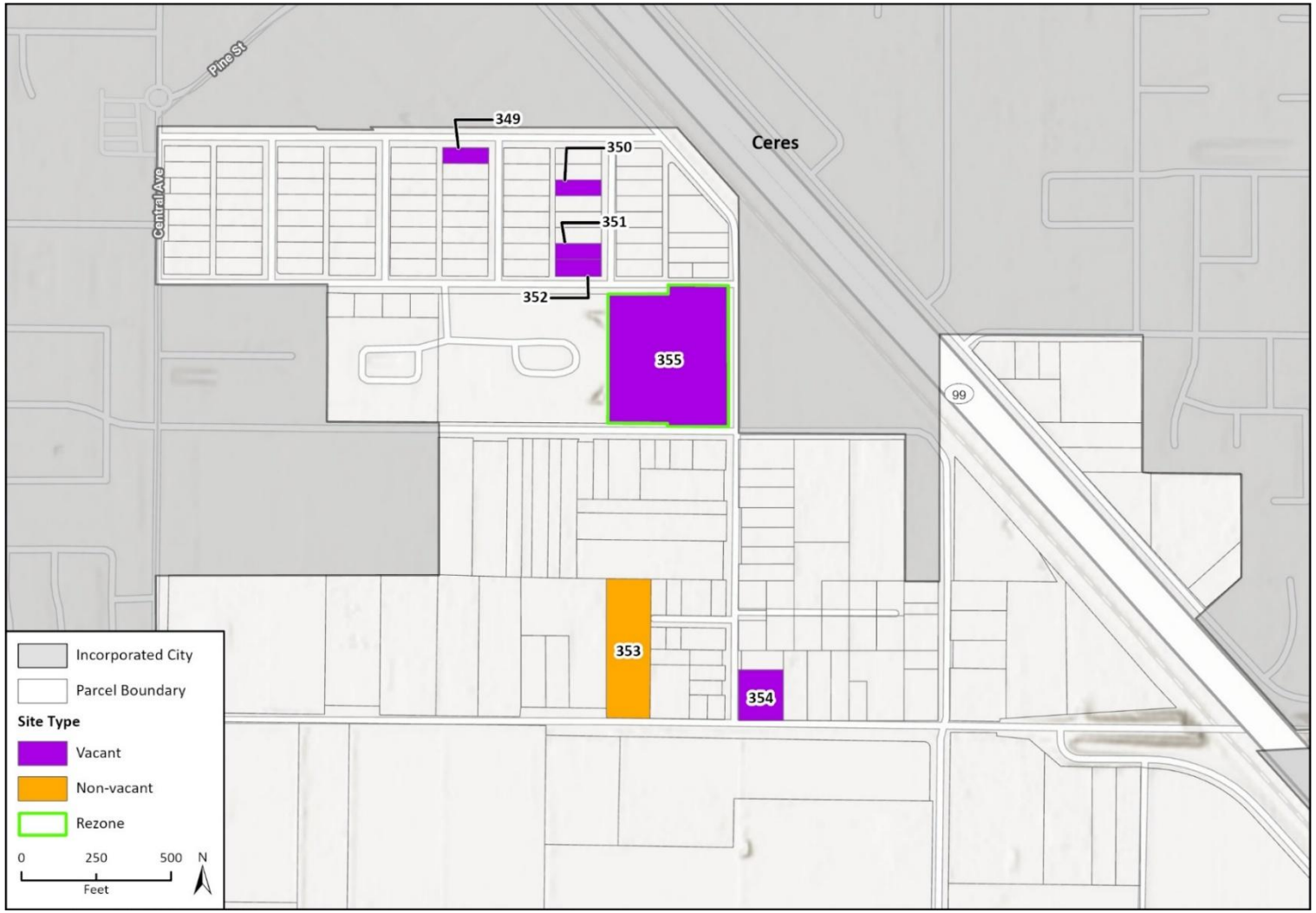
Salida Sites

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	2	0.60	0	5	2	7
Rezoned Sites	3	1.4	0	18	3	21
Total	5	2	0	23	5	28



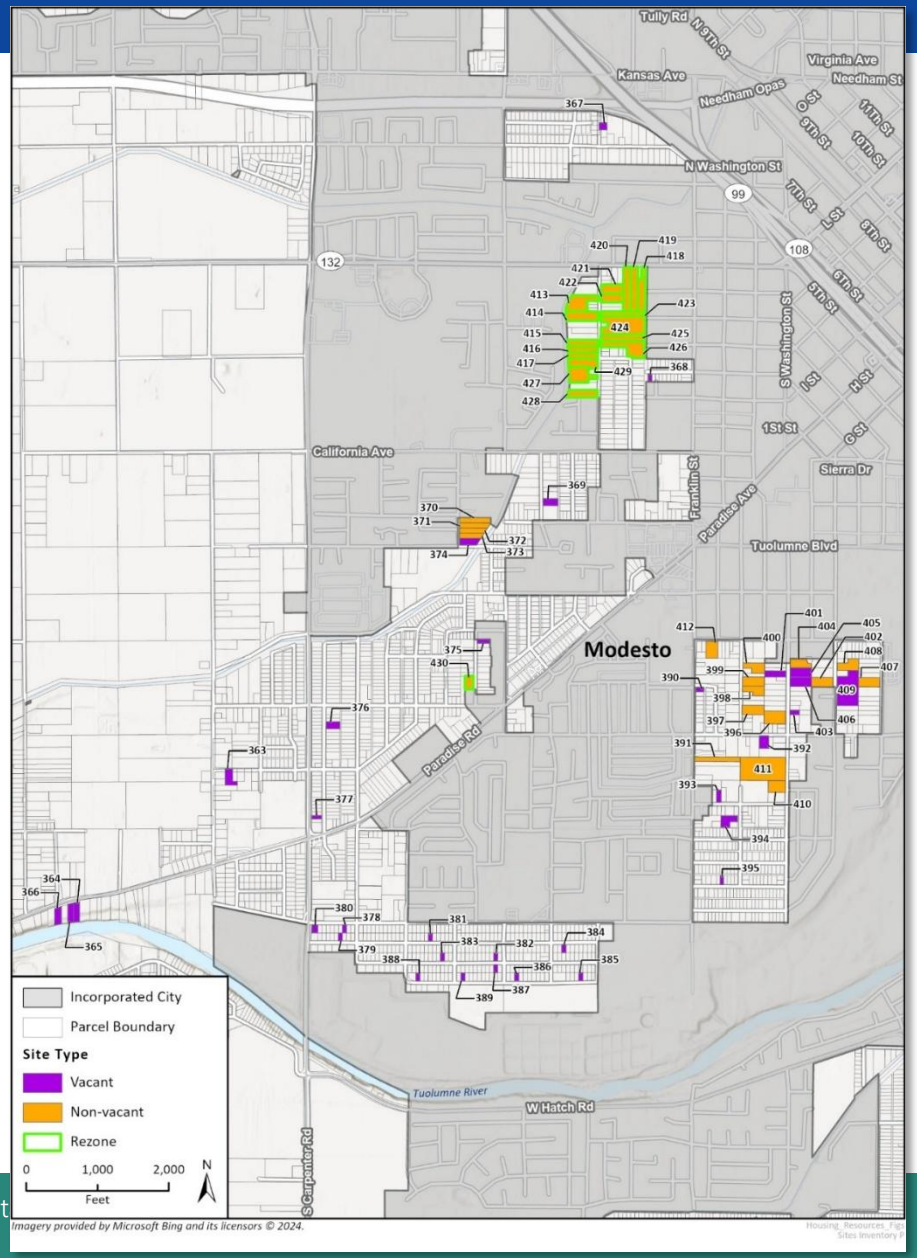
South Ceres (Laurel/Central)

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	6	2.93	0	1	9	10
Rezoned Sites	1	4.18	76	7	0	83
Total	7	7.71	76	8	9	93



West Modesto

Category	Number of Parcels	Acreage	Lower Income	Moderate Income	Above Moderate Income	Total
Non-Rezone Sites	50	32.34	0	109	92	201
Rezoned Sites	18	23.44	248	107	15	370
Total	68	55.78	248	216	107	571



Housing Plan

- The Housing Plan outlines goals, policies, and programs to support housing development, preservation, rehabilitation, and administration
- Addresses:
  - Public comments
  - Housing needs
  - Governmental constraints
  - Fair housing issues
  - Update policies to reflect current state law
- Programs from the previous Housing Element have been retained and updated

Implementation Programs

- Goal: Conserving and Improving Existing Housing Stock
  - Program 1-1 Home Rehabilitation Program
  - Program 1-2 Residential Compliance Program
  - Program 1-3 Building and Design Standards for Energy Efficiency
  - Program 1-4 Preservation of At-Risk Affordable Housing
- Goal: Assisting in the Development of Affordable Housing
  - Program 2-1 Affordable Housing Development Assistance
  - Program 2-2 Density Bonus
  - Program 2-3 Housing Choice Vouchers
  - Program 2-4 Support Homeownership Opportunities
  - Program 2-5 Housing Trust Fund
  - Program 2-6 Regional Collaboration to Facilitate Housing

Implementation Programs

- Goal: Providing Adequate Sites
  - Program 3-1 Ensure Adequate Sites to Accommodate Growth
  - Program 3-2 No Net Loss Zoning
  - Program 3-3 Replacement Housing
  - Program 3-4 Provide Adequate Sites for Lower-Income Households
  - Program 3-5 Adaptive Reuse
  - Program 3-6 Zoning for a Variety of Housing Types
  - Program 3-7 Expedited Project Review
  - Program 3-8 Accessory Dwelling Units
  - Program 3-9 Infrastructure

Implementation Programs

- Goal: Housing For Persons with Special Needs
  - Program 4-1 Housing for Special Needs Populations
  - Program 4-2 Farmworker Housing
  - Program 4-3 Homelessness
  - Program 4-4 Community Outreach and Education
- Goal: Equal Housing Opportunities for All Persons
  - Program 5-1 AFFH & Environmental Justice
  - Program 5-2 Fair Housing Services
  - Program 5-3 Displacement Prevention, Place-Based Strategies, and Housing Mobility

Housing Plan

- Geographic Targeting
  - R/ECAPs, RCAAs, high displacement risk, Disadvantaged Unincorporated Communities (DUCs)
- Special Population Targeting
  - Farmworkers
  - Persons with Disabilities
  - Homeless
  - Extremely Low-Income Families
- Actions to Allow for Flexible, Adaptive, and Alternative Housing
- Expanded Fair Housing, Infrastructure, Farmworker Housing Actions
- Actions Required to Reflect Current State Law
- Implementation of Housing Stanislaus

Housing Plan

- Affirmatively Furthering Fair Housing and Environmental Justice Actions:
  - Ant-Displacement Strategies
  - Place-Based Strategies
  - Community Outreach
  - Diversity, Equity, and Inclusion
  - Economic Mobility
  - Housing Mobility

HCD Review

- Draft 1
  - Circulated to the public for 30-days (August 31, 2023 to October 3, 2023)
    - Six comments received
    - Edits were made to address comments received
  - Revised draft sent to HCD for 90-day review (November 16, 2023 to February 5, 2023). HCD comments included:
    - Extremely low-income households and farmworkers – Additional outreach and actions required
    - Additional AFFH, demographic and housing needs analysis needed
    - Need to incorporate more local knowledge
    - Need to connect findings to proposed actions
    - Need more analysis on sites inventory
    - Need actions to include specific and quantifiable goals

HCD Review

- Draft 2
  - Circulated to the public for 7-days (August 29, 2024 to September 4, 2024)
    - Five comments received
    - Edits were made to address comments received
    - 10-day extension provided for public review
  - Revised draft sent to HCD for 60-day review (September 16, 2024 to November 15, 2024). HCD comments included:
    - Requested additional details on infrastructure requirements for new development
    - Requested more specific commitments and geographic targeting be added to a few programs
    - No additional comments on the sites inventory were provided

HCD Review

- Draft 3
  - Circulated to the public for 7-days (Jan. 28, 2025 to Feb. 3, 2025)
    - One comment received
  - Revised draft sent to HCD for 60-day review (Feb. 4, 2025 to Apr. 4, 2025)
  - Based on preliminary comments from HCD additional edits were made (version 3.5) and circulated to the public (March 25 – 31, 2025)
    - Two comments received
  - HCD comments:
    - More specific commitments, discrete timing, metrics, and geographic targeting,
    - Added actions that address AFFH, environmental justice, housing mobility, displacement prevention, infrastructure, place-based strategies, and commitments to conduct outreach and engagement
    - Need additional local knowledge on R/ECAP areas
    - Continuation of conducting community outreach

HCD Review

- Draft 4
  - Circulated to the public for 7-days (July 15, 2025 to July 23, 2025)
    - Two comments received
  - Revised draft sent to HCD for 60-day review (July 30, 2025 to September 30, 2025)
  - Based on preliminary comments from HCD additional edits were made (version 4.5) and circulated to the public (Sept. 18 – 24, 2025)
    - Two comments received
  - HCD requested additional anti-displacements actions
    - New action submitted
  - HCD provided a tentative approval letter on Sept. 29, 2025

Public Input on Fourth Draft

- California Rural Legal Assistance (CRLA)
  - Five responses received focused on anti-displacement actions, actions targeted to R/ECAPs, local knowledge, meaningful community outreach, additional lower-income sites in RCAAs
- Public Service Providers
  - Modesto and Oakdale Irrigation Districts
  - Burbank Paradise and Salida Fire Districts
    - Concerns with adequate fire service provision
    - Fire fees are required to be paid prior to issuance of a building permit
    - Rezone sites in Salida are required to annex into Salida Fire's Community Facilities District
- Multiple requests to have property added to rezone program

General Plan and Zoning Consistency

- Must be internally consistent
- Land Use Element
  - Effective level of public service
  - Sphere of Influence
  - Community Plans
- Update Disadvantaged Unincorporated Communities (AB 244 analysis)
- Safety and Environmental Justice policies
  - County staff putting together committee to review policies

Environmental Review

- Notice of Exemption
  - Section 15061(b)(3) – Common Sense
- The document is a long-range planning document which provides guidance for policies and programs that will not directly lead to development
- Implementation of the Housing Element will undergo a separate environmental review

Staff Recommendations

- Provide recommendation to the Board of Supervisors:
  - Approve the Stanislaus County Sixth Cycle Housing Element Update
  - Find the project to be CEQA Exempt and order the filing of a Notice of Exemption
  - Make General Plan Consistency Findings

Questions?

County Staff

planning@stancounty.com

(209) 525-6330

Source: New Home Construction by Great Valley Center (Flickr, CC 2.0)