

Appendix A

Summary of Public Participation

Summary of Public Participation

The Housing Element must reflect the values and preferences of the community. Accordingly, community participation is an important component of the development of this Element. Government Code Section 65583(c)(8) states that the local government must make “a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element.” This process not only includes community members, but also participation from local agencies and housing groups, community organizations, and housing sponsors.

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

These entities were included in all notifications associated with the Housing Element update, including community events, housing survey, and a participatory mapping exercise. A summary of the public participation is detailed below. Detailed information on the public engagement program is outlined below. Copies of community engagement materials are provided in this appendix.

Public Noticing

To reach the largest and broadest spectrum of community members and stakeholders, Stanislaus County utilized the following notification methods throughout the Housing Element update process:

- Flyers in English and Spanish advertising the project, community workshops, the community survey, and the participatory mapping activity were posted on the County’s website.
- Posts to the County’s social media accounts, including Facebook and Instagram, advertising the survey and the participatory mapping exercise.
- Email lists of community stakeholders, local governmental departments, and the 6th cycle Housing Element update email subscriber list to provide outreach and regular updates on the project. In addition, the County used Everbridge, the County’s mass notification system, to deliver notices to over 1,000 individuals.
- Letters to property owners of sites identified for potential rezoning were distributed with an overview of the Housing Element update process and an invitation to submit feedback.

Community Outreach

Community Workshops

The County held two in-person and virtual community workshops to inform the draft Housing Element in June and October of 2022. The workshops introduced Housing Element and General Plan goals and requirements to the community, educated the community on housing element requirements, and assessed participants’ housing needs, priorities, and concerns.

Flyers advertising the workshops were posted on the County's website, and stakeholders were emailed in advance of the workshop series. The flyers provided meeting details (dates, times, locations, zoom links), the Housing Element Update website and email address. Spanish translation services were made available for each workshop upon request. Each workshop consisted of a presentation and opportunities for discussion and input from participants.

A virtual workshop was held on June 23, 2022, via Zoom to discuss the Housing Element Update and related updates. During the workshop, the project team facilitated group discussions on housing, safety, and environmental justice. Participants noted the following housing issues:

- A housing-first approach is needed. Homeless and transitional housing is needed. This is the most immediate need in the county.
- Affordable senior housing is needed. They are a growing part of the population and there are few units.
- Zoning is a barrier. Appropriate zoning capacity is needed to meet the needs of affordable housing projects.
- There is a need for housing for youth coming out of foster care.
- Increases in rental up-front costs have been a constraint to accessing housing. Even when non-profits, such as Aspira Net, can help cover some costs, individuals still struggle to find available units and often don't have families to help secure housing.
- Similarly, housing choice vouchers can be obtained but there are few available housing options.
- The unincorporated area is diverse: urban to rural. There is significant need in urban areas, especially near Modesto. Proximity to transportation and resources should be considered. Outward growth is not in the interest of low-income households.
- Aging and veteran services are needed, including subsidized senior housing. Currently there is a 2-4 year waiting list for subsidized senior housing. Seniors are a special population. Low-income seniors have little economic mobility and have many needs.
- Attracting developers is tough. More incentives are needed for developers of special needs and senior housing.

An in-person community workshop was held on October 11, 2022 to gather community input on the site inventory selection component of the Housing Element and on issues related to safety and environmental justice. 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 July 7, 2022, presentation to the GPUC provided an overview of the Housing Element Update, the regional housing needs allocation (RHNA), state legislation, the Safety Element Update, and the Environmental Justice Element. The September 1, 2022, presentation to the GPUC discussed the sites inventory with an overview of proposed rezone sites.

A presentation to the GPUC was held on April 6, 2023, to solicit feedback on proposed policy and programs included in the Housing Element Housing Plan. The GPUC provided input on a variety of proposed housing programs, including the need for improved code enforcement data, inclusionary housing, and incentives for increased housing development such as density bonuses, public facility fee waivers, accessory dwellings. They also noted that more migrant and farmworker housing is needed, as well as more Housing Choice Vouchers, and shelter beds. Additionally, the Committee discussed the possibility of using a Community Development Financial Institution Fund, or an Enhanced Infrastructure Financing District to increase infrastructure and homeownership in the County. The Committee identified Keyes, and possibly parts of Denair for potential agricultural land redevelopment. A fourth presentation was held on August 23, 2023 to present the Draft Housing Element, amended Housing Plan, and changes to the sites inventory. 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 the mobile homes that allow park ownership to purchase the mobile home of a displaced resident at minimal cost, simply to

resell it at a high price. Individuals residing in mobile home parks currently have few protections and need support and assistance (i.e., rent stabilization) to prevent homelessness.

- **Need for additional housing sites.** Stakeholders commented on the importance of identifying feasible sites for multifamily housing development that have access to utilities and sufficient allowed density. Sites without sufficient zoning (at least 20 dwelling unit per acre) and nearby utility connections are simply infeasible for affordable development and are not considered by developers. Additionally, it is important that sites identified for low-income housing are not concentrated in areas that already have a disproportionate share of low-income housing as this may exacerbate existing issues (communities identified by name include South Modesto and Crows Landing). Stakeholders expressed the need for more transparency in the site selection and evaluation process and expressed an interest in seeing data related to previously used sites, sites with by-right zoning, and site-specific income assumptions.

Constraints

INFRASTRUCTURE

- **Lack of Infrastructure.** Many areas within unincorporated Stanislaus County lack connections to utility lines such as water and sewer. Most sites in rural communities do not have sufficient utility and transportation connections to support large multifamily developments. Connecting new utility lines is expensive, pricing out residents and disincentivizing developers from building in the unincorporated county. Many of the new infrastructure connections are to incorporated cities, and often requiring both upfront and recurring costs.

FINANCIAL AND ECONOMIC CHALLENGES

- **Cost of Development.** Land and construction costs have increased in recent years making it infeasible to build affordable housing units without government subsidies. Additionally, interest rates have increased in the last year, making it difficult and expensive to secure financing for development.
- **Cost of Entry.** There is a high cost of entry into the housing market. In many cases a household may be able to afford monthly rent or mortgage, but cannot meet the initial requirements for down payment, first and last month's rent, minimum credit score, or extensive rental history. The cost of entry is especially difficult for people on a fixed income, students, and undocumented individuals.

DEVELOPMENT REGULATIONS

- **Development Fees** Stakeholders expressed that fees associated with residential development disincentivize developers from building affordable housing. In Stanislaus County there is a farmland mitigation program that requires developers to pay for agricultural easements or pay an in-lieu fee to aid the loss of farmland. Unlike other development fees, developers have expressed that these fees are expensive and provide little benefit to the developer or tenants.
- **Zoning.** Stakeholders expressed that sites for lower-income capacity need to be zoned sufficiently to meet housing needs. Affordable housing developers expressed an interest in minimum density of 20-25 du/acre to be competitive for funding programs. Additionally, discretionary review processes are perceived as a constraint, and stakeholders expressed that by-right zoning for residential areas is key in attracting developers, especially for affordable housing.

- **Environmental Requirements for Industry.** Stakeholders report that State environmental regulations and requirements constrain industrial uses in the County, and that these constraints have led to companies leaving California altogether. This is especially true for the types of industry in Stanislaus County such as glass manufacturing, packaging, and molded plastics.
- **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 disincentive 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 8 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 5-1i 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. In response 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 10 years are “housing that is affordable for all,” “more opportunities for home ownership,” and “more rental housing.”
- A desire for co-housing (housing with an emphasis on community living, i.e.: shared open spaces, or kitchens).
- The most urgent housing issue in the county is affordability of housing.
- Areas near public transit stops, employment, and shopping centers were selected as the most suitable for new housing development.
- The two most-needed fair housing services in their communities are landlord/tenant counseling and education/information on tenant rights.
- Respondents identified down payment assistance for lower-income first time homebuyers and home repair assistance for low-income homeowners as the most needed housing assistance services.

Participatory Map Activity

Participatory mapping exercises are a type of survey that allows participants to view, comment, and prioritize specific topics related to the housing element. The participatory mapping exercise allowed participants to identify and rank potential housing opportunity sites. Input gathered through this activity informed the County’s site selection process.

The participatory mapping exercise involved a Geographic Information System (GIS)- based survey that was available from October 11 to November 1, 2022, on the project website. Notice of the survey was sent out via email lists to interested parties and was advertised on the County’s social media and website. The survey garnered 177 total responses, 27 of which were general comments and feedback on the sites inventory. The remaining 150 responses were made regarding 98 of the identified sites included in the site inventory. Survey input resulted in the following themes:

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

Project Website

A project website dedicated to the Housing Element update was created to provide information and solicit feedback. That site can be found here: <https://www.stancounty.com/planning/pl/general-plan.shtm>. The project website included background information on the Housing Element, information on upcoming events and engagement opportunities, answers to frequently asked questions, links to upcoming and past event materials, and links to articles and videos on the general plan topics. Project materials were regularly posted on the project website, including documents available for public review, information for upcoming events, and virtual workshop PowerPoint

presentations and video recordings. There was also a sign-up form to receive project email updates and a comment function.

Housing Stanislaus Initiative

Housing Stanislaus is a countywide initiative to develop a unified and actionable vision and strategy framework for housing in Stanislaus County. County staff, along with Valley Vision, a non-profit civic leadership consulting firm, developed an outreach and community engagement strategy that aimed to establish a shared understanding of the needs, challenges, and opportunities for housing, and identify and prioritize projects and programs for housing development. Valley Vision conducted surveys and meetings between December of 2021 and July of 2022 with the incorporated cities and a wide range of local stakeholders, subject matter experts and industry professionals. This included key informant interviews. 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 Dulce Ochoa Marissa Prasse Hillary Prasad	HCD
City Managers	Merry Mayhew Sean Scully Bryan Whitemyer Alex Terrazas Ken Irwin Joseph Lopez Michael Holland Michael Pitcock	Hughson City of Riverbank City of Oakdale City of Ceres City of Patterson City of Modesto City of Newman City of Waterford
County Executive	Jody Hayes	Stanislaus County
City council Members	Chris Ricci Sue Zwalen (Mayor) Luis Uribe Elizabeth Talbott	City of Modesto City of Modesto City of Riverbank City of Waterford
City & County Planning, Community Development, Building, Public Works Staff	Angela Freitas Kristin Doud Emily Basnight Kyle De Jesus Frederic Clark Miguel Diaz Steve Mitchell Oscar Diaz Edgar Garcia Jim Alves Rachel Wyse Carla Jauregui Katie Quintero Kim Hammack Maria Ramos Justin Hendrix James Michaels Samir Royal Kevin Waugh Jeff Gravel	Stanislaus County Stanislaus County Stanislaus County Stanislaus County Stanislaus County Stanislaus County City of Modesto City of Modesto City of Modesto City of Modesto City of Hughson City of Hughson City of Turlock City of Turlock City of Turlock City of Newman City of Ceres City of Ceres City of Ceres City of Oakdale

Interest Area	Name	Organizational Affiliation
	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	Stanislaus Regional Housing Authority
	Jim Kruse	
Special Population Interests	Jill Erickson	Area Agency on Aging
	David Jones	First 5 Stanislaus
	Heather Santos	Disability Resource Agency for
	Yasmin Martinez	Independent Living
	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
Realtors	Chad Costa	Re-MAX (Modesto Office)
	Kevin Bens	Keller Williams (Oakdale Office)
	Jeff Diehl	Diehl Real Estate
	Rick Jones	Touchdown Properties
Employers and Business	Anthony Ratto	Ratto Brothers
	Dave White	Opportunity Stanislaus
	Maryn Pitt	Manufacturers Council of the Central Valley
Latino Interests	Eric Alvarez	Debrief Team
	Emmanuel Escamilla	
	Nancy Martinez	
	Jose Borroel	
Seniors	Jill Erickson	Area Agency on Aging
	John Dinan	
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, financiers/funders, real estate professionals, property managers, employers, and community-based organizations. Five overarching themes emerged through these conversations included:

- Vocal community opposition to housing projects
- Regulations and procedures
- Limited land options stemming from lack of infrastructure and agricultural land conservation policies
- Market conditions and impact on development costs and return on investment
- Overburdened staff

This feedback was incorporated into policies and programs. 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).

Individual Correspondence

The County had several one-on-one communications via meetings, calls, mail, and email correspondence with local community members and local jurisdictions. The feedback is summarized as follows.

City of Ceres

The County met with the City of Ceres Department of Planning to discuss the Housing Element sites located within the City's Sphere of Influence. The City did not have any objections to the four sites proposed for rezoning for higher density residential. The City did note that there were sites identified as "Additional Opportunity Sites" that would be taken in order to accommodate the proposed Service/99 interchange and should not be counted among the County's opportunity sites. The eminent domain proceedings are anticipated to begin next year. Additionally, there are two other properties that require small partial takes, including the southwest 0.01 acre of a site on Don Pedro, and the southern nine feet (0.03 acres) of a property on Service and Collins.

City of Oakdale

The County met with the City of Oakdale representatives to discuss the Housing Element site located within the City's Sphere of Influence, at 624 N. Stearns Road. The City's 2030 General Plan includes this property as "Future Specific Plan Area 8," but does not specify any land use designations for this property. Policy guidance suggests a potential for various housing opportunities and densities. Utility services such as water and sewer would be extended from just south of this property. However, the City did note that the City may need to rely on the site in question to achieve their own RHNA.

City of Modesto

The County reached out to the City of Modesto Planning Department to ask for input on sites within the Colorado/Rouse area, as the City is planning to annex the area in the future. The City provided the pre-zoned designations.

Xander Dev Co, LLC

An affordable housing developer reached out to the County to seek a list of sites to build 100 percent affordable multifamily housing. They suggested 624 N Stearns Rd in Oakdale as a potential site because it is in a high-resource area, which is important for affordable housing financing.

Local Constituents

Several local community members emailed voicing their concern regarding increased development leading to water shortages, traffic, air pollution, and nuisance to surrounding properties. One constituent argued that high density for the parcel between McHenry & Spy Glass Dr. (APN 004102005) would be inappropriate as it is far from retail and services, is not walkable, does not have sewage service, and is close to the environmentally sensitive Stanislaus River.

Stanislaus Union School District

Stanislaus Union School District wrote to the Planning Department raising concerns with school capacity and infrastructure to accommodate future growth. The district will continue to develop a ten-year plan to accommodate anticipated growth and asked for continued future partnership.

Property Owners

The County received a phone call from the property owners of one of the sites identified as a possible rezoning site. He asked about the project, and voiced supported inclusion of his property, as well as two additional properties. He also inquired about sewer service. The County provided an estimation of residential unit capacity.

Service Providers

The County reached out to the Keyes Community Services District, the City of Modesto Engineer, and to the Stanislaus County Local Agency Formation Commission to see if the sites identified in would be provided services. They all responded that they would be able to serve those parcels with water and sewer service.

Municipal Advisory Council Meetings

Three presentations were made to Municipal Advisory Councils (MACs) in September and October of 2023. A MAC, as formed by California Government Code Section 31010, is an advisory body of local citizens elected by the community or appointed by the Board of Supervisors with the purpose of representing the community to the Board of Supervisors. The South Modesto MAC meeting was held on September 14, 2023, the Denair MAC meeting was held on October 3, 2023, and the Keyes MAC meeting was held on October 19th, 2023. 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 Site Inventory
- Questions on the availability of rental units and desire for an inclusionary ordinance
- Desire to coordinate with Stanislaus Regional Transportation Authority to ensure that bus route adjustments can be made to accommodate additional population density
- Concerns about existing infrastructure capacity and the need for additional infrastructure in areas identified for additional housing

- Concerns about the impact on traffic, flooding, emergency response times as a result of increased housing development
- Desire for integrating more housing in existing commercial areas
- Concerns about design and affordability of future housing
- Concerns about specific Site Inventory constraints

Public Review

Six comment letters were received during the public review period of August 31 to September 30, 2023, and two letters were submitted in December 2023 and February 2024. An additional letter was received from California Rural Legal Assistance, Inc on April 9, 2024. Copies of letters received are provided in this appendix. An overview of comments and how they were addressed in this draft are included in Table A-3 as follows:

Table A-3 Public Comment Summary and Response

Topic Area	Comment Summary	Response
Public Outreach	<ul style="list-style-type: none"> ▪ 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 ▪ Calls to discuss previous housing element policies during workshops ▪ Concerns over the complexity of online Sites Inventory tool for assessing proposed sites for housing 	<p>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 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.</p> <p>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.</p>
AFFH	<ul style="list-style-type: none"> ▪ 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 	<p>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.</p> <p>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</p> <p>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.</p>

Topic Area	Comment Summary	Response
	<ul style="list-style-type: none"> Concerns that the Housing Element adequately address environmental justice concerns and utilize tools like CalEnviroScreen to identify impacted communities. 	<p>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.</p> <p>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.</p> <p>Additional information was added regarding Fair Housing enforcement and outreach capacity.</p> <p>More analysis was added on disproportionate housing needs, contributing factors, and prioritization of actions.</p>
Constraints	<ul style="list-style-type: none"> 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 Waste Water 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. 	<p>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.</p> <p>Chapter 5 includes an analysis of infrastructure on an area and site level.</p>
Sites Inventory	<ul style="list-style-type: none"> 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. 	<p>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.</p> <p>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.</p> <p>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.</p>

Topic Area	Comment Summary	Response
	<ul style="list-style-type: none"> 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. 	<p>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.</p>
Programs	<ul style="list-style-type: none"> 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 	<p>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:</p> <ul style="list-style-type: none"> 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
	<ul style="list-style-type: none"> ▪ 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. 	
Infrastructure	<ul style="list-style-type: none"> ▪ 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 permit approval and construction.
Housing Needs Assessment	<ul style="list-style-type: none"> ▪ 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.

Attachment 1

Housing Element Survey Results

Housing Element Survey Results

The County conducted a community survey to inform the 6th Cycle Housing Element update. This summary memorandum presents the results and key findings from the survey responses.

Survey Marketing Summary

A variety of outreach efforts were conducted to encourage survey participation, creating another opportunity for community members to engage in the overall General Plan Update process, to contribute their ideas, respond to choices, and help shape the direction of policies and programs. Below are some of the outreach efforts used to bring the survey to the community:

- Stanislaus County website (<https://www.stancounty.com/planning/pl/housing-element.shtm>)
- Stanislaus County social media accounts including Facebook, Twitter, and Instagram.

Methodology

The survey questions were developed by the consultant team with key input from the Stanislaus County Planning & Community Development staff. The survey was released to the public online on date and remained open until date. The survey was also made available during various community outreach events. A total of 148 people responded to the survey.

Survey Format

The survey consisted of 16 questions and used different formats for questions: checkbox, ranking, and open-ended questions. The checkbox questions asked respondents to indicate their preference for answer options. The ranking questions asked respondents to rank answer options from most to least important. The survey was made available in both English and Spanish. A copy of the complete survey is included in the Appendix.

Survey Results

The survey was presented in electronic form (online), and it should be noted that responses received may not represent the entire population being queried. Since only a portion of the county population responded, results do not represent the views or preferences of the entire County. However, the survey results can provide a general sense of residents' priorities and visions for the county of the topic areas presented. Complete survey results are included in the Appendix.

Question 1: Rank the housing needs facing unincorporated Stanislaus County from highest priority (1) to lowest priority (10)

Question 1 asked respondents to rank a list of housing-related needs within unincorporated Stanislaus County. Scoring for the survey question was based on how highly each item was ranked by each individual. The highest possible score for an item was ten, meaning every respondent selected that item as the highest priority housing need, and the lowest possible score was one,

meaning every respondent selected that item as the lowest priority housing need. The resulting scores were the following, listed from highest to lowest in Table 1.

Table 1 Responses to Question 1

Rank	Current Housing Need	Score
1	Need housing choices in lower price range to rent	6.8
2	Need housing choices in lower price range to own	6.6
3	Need more housing for seniors	5.8
4	Need homes that are affordable to first-time homebuyers	5.4
5	Need housing for people who work here	5.0
6	Need more housing for large families	4.8
7	Need more housing for multiple-generation families	4.5
8	Need more variety of housing types	4.0
9	All housing needs are being met	2.2

Based on a total of 148 responses, the “need for lower-priced rentals” was the highest scoring item with a score of 6.78. The “need for lower-priced homes for purchase” was a close second with a score of 6.57, followed by “need for more housing for seniors,” with a score of 5.76, “affordable homes for first-time homebuyers,” with a score of 5.40, “housing for people who work locally,” with 4.98, “more housing for large families,” with 4.84, “housing for multiple generation families,” with 4.48, and “more variety of housing types,” with 3.95. The lowest scoring item was “All housing needs are being met,” with a score of 2.24.

Question 2: Select the top three housing needs for unincorporated Stanislaus County in the coming 10 years (check three)

Question 2 asked respondents to select the top three housing-related needs within unincorporated Stanislaus County in the coming ten years from a list of nine options. The highest possible score for an item was 100, meaning that every respondent had selected the item as one of the top three housing needs, and the lowest possible score was zero, meaning no respondent selected the item as one of the top three housing needs. The resulting scores were the following, listed from highest to lowest in Table 2.

Table 2 Responses to Question 2

Rank	Future Housing Need	Score
1	Housing that is affordable to all	67%
2	More opportunities for home ownership	63%
3	More rental housing	35%
4	Repairs to older deteriorating homes	33%
5	Accessible and wide range of housing types for our aging population	29%
6	Various housing types to appeal to different lifestyles	24%
7	Housing near transportation and/or services	24%
8	Housing for multigenerational households and large families	14%
9	Other (please specify)	12%

Based on a total of 148 responses, the need for “housing that is affordable to all” was the highest scoring item with a score of 66.9. The need for “more opportunities for home ownership” was a close second with a score of 62.8, followed by the need for “more rental housing,” with a score of 35.1, “repairs to older deteriorating homes,” with 33.1, “accessible and wide range of housing types for our aging population,” with 29.1, “various housing types to appeal to different lifestyles,” with 23.7, “housing near transportation and/or services,” with 23.7, and “housing for multigenerational households and large families,” with 14.2. 11.5 percent of respondents selected “Other” and entered custom responses which are listed in Table 3 below.

Table 3 Custom Responses to Question 2

Affordable rentals
Affordable Senior Housing
Casas de bajos recursos
Homes with better access to public utilities like water and sewer.
Housing for the unhoused
housing policy that discourages short term rental and commuter homes/keeps community members closer to home
Housing prices/rent controlled
Incentives/Lower Fees to help reduce building costs
more NEW TRAILER PARKS, perhaps IN DEL RIO AREA
remove homeless
Repair homes for elderly & disabled, install/repair A/C and heating units for elderly & disabled. Finally have ALL EMS personnel (private, city & county) check on all elderly & disabled citizens twice a month.
Sidewalks
smaller, cheap housing for singles just trying to survive (i.e. under \$300/mo)
sober living with program goal of independency

Question 3: Please rank each housing type based on what would be most successful in unincorporated Stanislaus County today (1 is most successful and 5 is least successful)

Question 3 asked respondents to rate 11 housing types on a scale from one to five based on which ones would be most successful in unincorporated Stanislaus County. The highest possible score for an item was five, meaning that every respondent ranked that housing type five out of five, and the lowest possible score was one, meaning that every respondent rated the housing type one out of five. The resulting scores were the following, listed from highest to lowest in Table 4.

Table 4 Results of Question 3

Rank	Most Successful Housing Types	Score
1	Co-housing (housing with an emphasis on community living i.e., shared open spaces, or kitchens)	3.6
2	Larger, custom homes	3.2
3	Single room occupancy (small apartment that may have a common kitchen)	3.1
4	Courtyard housing (housing arranged around a common courtyard)	2.9
5	Mid-rise (4-story) apartments	2.8
6	Micro-units (small studio apartments with full kitchens, Murphy beds (wall beds), drop-down surfaces like tables desks and more design features)	2.7
7	Accessory dwelling units (ADUs/second units/granny units/junior units)	2.6
8	Duplexes, triplexes, townhouses and low-rise multi-use buildings	2.3
9	Residential Care Facilities for Seniors or Persons with Disabilities	2.1
10	Single-story houses and condominiums	2.0
11	Senior housing allowing for aging in place (independent to assisted living) and meeting all income levels.	1.9

Respondents identified “co-housing” as the most potentially successful housing solution in unincorporated Stanislaus County with a score of 3.6 out of five. “Larger, custom homes” and “single room occupancy” homes with shared kitchens had similar scores with 3.2 and 3.1, respectively. Notably, single room occupancy apartments with common kitchens are similar to co-housing, suggesting respondents are open to housing options with common spaces. “Mid-rise apartments,” “micro-units,” and “accessory dwelling units” had comparable scores of 2.8, 2.7, and 2.6, respectively. The final four options all had similar ratings, notably all below 2.5 meaning that the survey respondents generally felt negatively towards them, with scores of 2.3, 2.1, 2, and 1.9.

Question 4: What do you believe are the most urgent housing issues in unincorporated Stanislaus County? (Rank the issues below with 1 being the most urgent)

Question 4 asked respondents to rank seven housing issues in unincorporated Stanislaus County in order from most to least urgent. The highest possible score for an item was seven, meaning that every respondent ranked the issue as the most urgent, and the lowest possible score was one, meaning that every respondent rated the issue as the least urgent. The resulting scores were the following, listed from highest to lowest in Table 5.

Table 5 Results of Question 4

Rank	Issue	Score
1	Affordability of housing	5.9
2	Availability of housing	5.5
3	Homelessness	4.8
4	Housing quality	3.5
5	Overcrowding	3.4
6	Fair housing/housing discrimination	3.3
7	There are no urgent housing issues	1.6

Respondents identified “affordability of housing” as the most urgent housing issue in the county by a significant margin with a score of 5.9 out of a possible seven. “Availability of housing,” which is connected with housing affordability, scored 5.5. “Homelessness” was identified as the third most urgent issue with a score of 4.8. Three subsequent issues scored less than 3.5, a significant drop from the top three: “Housing quality” scored 3.5, “overcrowding” scored 3.4, and “fair housing/housing discrimination” scored 3.3. Few respondents agreed that there are no urgent housing issues in the county, which scored 1.6.

Question 5: Using numbers from 1 through 6, with 1 being the best and 6 being the worst, please rank the areas where you believe housing should be developed in unincorporated Stanislaus County?

Question 5 asked respondents to rank six geographic categories based on their suitability for new housing. The highest possible score for an item was six, meaning that every respondent ranked the issue as most suitable for new housing, and the lowest possible score was one, meaning that every respondent rated the issue as the least suitable for housing. The resulting scores were the following, listed from highest to lowest in Table 6.

Table 6 Results of Question 5

Rank	Area Type	Score
1	Areas near public transit stops, employment, and shopping centers	4.80
2	Vacant Land on the edges of the cities and unincorporated communities	3.80
3	Areas with existing housing (increasing the number of units that could be built on each property such as with fourplexes, courtyard houses, and other types of apartment complexes)	3.52
4	Land that could be converted from commercial (office/store) to residential or mixed use (e.g., apartments or condominiums with ground floor stores or restaurants)	3.49
5	On existing single-family properties as accessory dwelling units (ADUs) or granny flats	3.00
6	Agricultural land on the edges of the cities and unincorporated communities	2.60

Respondents identified “areas near public transit stops, employment, and shopping centers” as the most suitable for new housing development by a significant margin with a score of 4.8. Respondents also indicated that “vacant land on the edges of the cities and unincorporated communities” was suitable for new housing with a score of 3.8. Respondents were mixed or indifferent towards increasing density within existing neighborhoods or commercial areas (3.52 and 3.49), and towards adding ADUs (3.0). Respondents generally considered agricultural lands as unideal options for new housing (2.6).

Question 6: Which fair housing services do you feel are most needed in our community? (Select all that apply)

Question 6 asked respondents to select fair housing services that were most needed in their communities and to suggest other relevant services. The highest possible score was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 7.

Table 7 Results of Question 6

Rank	Fair Housing Service	Score
1	Landlord/tenant counseling	68%
2	Education/information on tenant rights	65%
3	Promoting equal access to housing choice for all residents	51%
4	Assistance with filing a housing discrimination complaint	42%
5	Other (please specify)	18%

Respondents identified “landlord/tenant counseling” and “education/information on tenant rights” as the two most-needed services in their communities with similar scores of 68 percent and 65 percent respectively. About half of respondents selected “promoting equal access to housing choice for all residents,” and 42 percent selected “assistance with filing a housing discrimination complaint.” Eighteen percent of respondents selected “Other,” and left a total of 24 responses which are listed in Table 8 below.

Table 8 Custom Responses to Question 6

an entity to advocate for tenant rights that is free
money management courses
We don't have fair housing problems
legal assistance for those facing eviction
Assistance with Utilities since people can hardly afford rent
Everything is already "FAIR" Stop with the nonsense
get the DA on the case looking for red lining and criminal conspiracy to keep rentals off the market.
No drug dealers using section 8 housing
Help finding housing and filling out forms.
Access to rapid rehousing and at risk of homelessness issues with one time or short term subsidy
Landlord rights
1 website that contains all affordable housing in Stanislaus w/ requirements - clear
Landlord outreach and engagement
homeless removal
Managing/minimizing rent increases in the middle of a pandemic/recession. Not cool at all but it happens to so many people I know, including myself.
Ability to build homes affordably
Allowing citizens to file a complaint against a landlord slum on the County or City apps?
Stop giving the homeless a handout! No one ever helped my momma buy a home, or helped with repairs!!! She worked hard for 45+ years and never received a handout AND SHE DESERVED HELP!!!
RENT CONTROL
If someone pays rent on time for say 3 year period there should be a loan program/grant that takes that into consideration for first time home buyers.
Senior citizen advocates
Biased question
rental caps
Landlords maintenance of property

Question 7: Which housing assistance services do you feel are most needed in our community? (Select all that apply)

Question 7 asked respondents to identify housing assistance services that are most needed in their communities. The highest possible score was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 9.

Table 9 Results of Question 7

Rank	Housing Assistance Service	Score
1	Down payment assistance for lower-income first time homebuyers	61%
2	Home repair assistance for low-income homeowners	57%
3	Rental assistance	48%
4	Education seminars for aspiring homeowners	32%
5	Financial assistance to build an accessory dwelling unit	31%
6	Other	10%

Respondents identified “down payment assistance for lower-income first time homebuyers” and “home repair assistance for low-income homeowners” as the most needed services in their communities with scores of 61 percent and 57 percent respectively. Slightly less than half identified “rental assistance” as a most-needed service, and less than a third identified “education seminars for aspiring homeowners” or “financial assistance to build an accessory dwelling unit” as most-needed services. 10 percent of respondents selected “Other”. Respondents left a total of 13 comments which are listed in Table 10 below.

Table 10 Custom Responses to Question 7

I feel that there could be successful use of existing county/state owned structures and properties that would ease the issue of homelessness in this county, reduce costs of labor for cleanup and road crews, and assist individuals with development of self-efficacy.
Helping disabled and elderly find homes/apartments they can afford.
Programs for middle class as there is no help for them and is getting harder to find affordable housing.
Stop with the "permit" requirements for everything
local codes to help new Mobile Home Parks that are owned by those that live there like a co-op... maybe county is land lord the first few years to get it going.
Consistent help with finding and filling out forms.
Assist families w/ deposit assistance
Rental subsidies
Funding for improving infrastructure in existing communities
RENT CONTROL
Homeless Housing Assistance
Down payment assistance for mid-income buyers that do not own a home
Beautification of properties

Question 8: Which Accessory Dwelling Unit (ADU) assistance services are most important?

Question 8 asked respondents to select the most important ADU services from a list of six items or to suggest other assistance services. The highest possible score for each item was 100 percent, meaning that every respondent selected that service as most needed in the community, and the lowest possible score was zero percent, meaning that no respondent selected that service as most needed in the community. The resulting scores were the following, listed from highest to lowest in Table 11.

Table 11 Results of Question 8

Rank	ADU Assistance Service	Score
1	Advice on what type of ADU will work best for your situation	47%
2	Financial assistance with construction expenses	44%
3	Educational “How To” Webinar series regarding financing, construction, and permitting process	40%
4	Pre-approved ADU floorplans	34%
5	Education on how to become a landlord	29%
6	Homeowner one-on-one consultations with an ADU expert	29%
7	Other	10%

Respondents identified “advice on what type of ADU will work best for your situation” as the most important service for aspiring ADUs owners with a score of 47 percent, followed by “financial assistance with construction expenses,” with a score of 44 percent and “educational “How To” Webinar series regarding financing, construction, and permitting process,” with a score of 40 percent. About a third of respondents selected “Pre-approved ADU floorplans,” “Education on how to become a landlord,” and “Homeowner one-on-one consultations with an ADU expert,” with scores of 34 percent, 29 percent, and 29 percents respectively. Ten percent of respondents selected “Other”, and respondents left a total of 13 individual comments which are listed below in Table 12.

Table 12 Custom Responses to Question 8

Only approved in areas that can handle population density.
NO ADU PERMITS
Should be not for rent.
Offering a different company other than PGE
how to keep the on street parking from being a problem.
Programs and grants available
Public facility fee, school and fire fee waivers
Granny apartments NOT for the homeless!
Don't think this is important
None of the Above
Accessory dwelling eco options, solar install incentives or charging ports for electric cars s, sola
Down payment assistance for mid-income buyers that do not own a home
Beautification of properties

Question 9: Would you be interested in developing an ADU (e.g. granny flat, in-law unit) on your property?

Question 9 surveyed respondents on their interest in developing an ADU. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed in Table 13 below.

Table 13 Results of Question 9

ADU Interest	Percent
Yes, on my existing or future property	39%
I already have an ADU on my property	1%
Not sure	20%
No	40%

Approximately 60 percent of respondents had at least some interest in building an ADU, while 40 percent of respondents did not. Only one respondent had already built an ADU on their property.

Question 10: Which best describes your current housing situation?

Question 10 asked respondents to identify their current housing ownership situation by selecting from a list of five options, or to select “Other” and enter a custom answer. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 14.

Table 14 Results of Question 10

Housing Situation (Own, Rent, or Other)	Percent
Own my house, condominium, apartment, or mobile home	64%
Rent a house, condominium, apartment, or mobile home	28%
Live with friends/family, do not own or pay rent	3%
Live with roommates/family and pay rent or assist with mortgage payments	4%
Live in emergency, transitional, or supportive housing	0%
Other	2%

The overwhelming majority of respondents owned their homes (64 percent). One third of respondents rent or assist another person with rent, and five percent of respondents are in some other living situation. Two custom responses were received and are listed in Table 15 below.

Table 15 Custom Responses to Question 10

Currently in HUD apartment after waiting 2 years.
family own home, I pay mortgage

Question 11: Which best describes your current living situation?

Question 11 asked respondents to identify their current housing companion situation by selecting from a list of six options, or to select “Other” and enter a custom answer. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed in Table 16 below.

Table 16 Results of Question 11

Housing Situation (Housing Companions)	Score
Live with spouse or significant other and children	45%
Live with spouse or significant other	22%
Multiple generations living together (adult children, parents, grandparents, etc.)	13%
Live alone	6%
Live with roommates	3%
Live with parents	1%
Other	10%

The overwhelming majority of respondents live with a family member with a total of 81 percent of responses. Six percent of respondents live alone, three percent live with roommates, and 10 percent selected “Other”. Respondents left 14 custom responses were received which are listed in Table 17 below.

Table 17 Custom Responses to Question 11

Parent. Children live with me, one is an adult in college
Live with minor child, no spouse
single parent with children
Live with child
Live w/ spouse, children, and elder parent
W/son
Single parent with two children
Single parent with dependent children
Just me and my two dogs, why complicate my life. LOL
Live with sibling
Single Father w/ child
Live with children
Single mother providing house for two children
Caring for older parent in my home

Question 12: Which of the following housing quality issues, if any, do you feel apply to your current living situation?

Question 12 asked respondents to identify housing quality issues from a list of six options plus an “Other” option. The highest possible score for each item was 100 percent, meaning that every respondent selected that answer, and the lowest possible score was zero percent, meaning that no respondent selected that answer. The results are listed below in Table 18.

Table 18 Results of Question 12

Rank	Housing Quality Issue	Score
1	None of the above	40%
2	Lack of energy efficiency	19%
3	Housing structural/maintenance issues	18%
4	Other	11%
5	Overcrowding within the household	5%
6	Lack of access to adequate plumbing	3%
7	Poor indoor air quality	3%
8	Lack of access to adequate kitchen facilities	1%

40 percent of respondents did not identify a housing quality issue, while another 37 percent identified either “lack of energy efficiency” or “housing structural/maintenance issues,” with scores of 19 percent, and 18 percent, respectively. “Overcrowding within the households,” lack of adequate plumbing,” “poor indoor air quality,” and “lack of access to adequate kitchen facilities” made up another 12 percent of responses. 11 percent of respondents selected “Other”, and left 13 custom answers which are listed in Table 19 below.

Table 19 Custom Responses to Question 12

Cost of PGE
could really use a ADU, my mother has a deteriorating chronic condition, we love our small home and don't want to give it up but having her onsite would address potential future safety issues. My father-in-law is going through a serious medical issue and we don't fill we have enough space to invite him to come stay until things stabilize.
Espacio de casa muy chica y renta muy costosa ayúdenme por favor soy padre de 2 hijas y mi esposa no trabaja yo pago todos los gastos y me quedo sin dinero durante 15 días ayuda por favor
homeless are contaminating rivers, well water
Lack of access to adequate plumbing, poor indoor air quality, housing structural/maintenance issues, lack of energy efficiency
lack of clean air from all the 'harvest dust' unequal access to water.
Lack of space and affordability
Las calles no tienen banquetas y se ase mucho cochinerio
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 cochinerio

Question 14: Optional: What is your total household income?

Question 14 asked respondents to identify their household income level. The results are listed in Table 22 below.

Table 22 Results of Question 13

Household Income Level	Score
\$100,000+	25%
\$50,000 to \$74,000	19%
\$75,000 to \$99,999	18%
\$25,000 to \$49,000	16%
Decline to state	12%
Less than \$25,000	10%

Question 15: Let us know if there is anything we missed! Below, provide other comments you would like to make pertaining to housing issues, housing types, or the provision of housing in Stanislaus County.

Question 15 was a call for open-ended answers. A total of 44 custom responses were received, and are listed below in Table 23.

Table 23 Answer for Question 15

Más acceso a las viviendas
the continued acceptance of higher rent rates is growing in our area, which will undoubtedly lead to higher numbers of homeless in the area. Making use of county/state-owned buildings, properties, and land, and converting them into housing /programs could benefit the area.
Salida and other unincorporated areas should not shoulder the responsibility of low income housing. Bad rentals are a major problem.
When social security income is raised, please do not raise HUD/Assistance rental amounts too much.
Para la case media, que ayuda nos pueden asistir , ya que no calificó para ningún servicio público !
Que sean mas accesibles sin nevesidad de un seguro
K las rentas bajen están muy caras
Ayuda para comprar casa por primera vez a personas que ganan 18 dólares la hora por favor soy padre de 2 hijas y esposo, no me alcanza el dinero y no bebo alcoho ni fumo no tengo vicios, soy trabajador pero me pagan poco.
I'm more concerned about the fact that people dump trash all over the area. How about finding a solution for that because it's unsanitary.
I am for Rental assistance for homeless families who are working and can't find affordable rentals. As a taxpayer I feel that there needs to be assistance/rehab for homeless to gain job training- if they can show they obey the law and be a part of the working members society to gain assistance.
Sidewalks
Need help removing inground pool due to high cost of maintenance and deteriorating pipes
Some people don't care about having all the utility amenities, they just want a cheap space of their own with a locking door, the county restrictions for landlords make this type of affordable option illegal to provide. Also trash removal from homeless/people living in vehicle, falls on landowner/homeowner, and this is not fair when the county makes evicting people such a difficult & time consuming process.
Middle class gets no breaks.
Speed up approval process

Stanislaus County
2023-2031 Housing Element Update

Bus out all homeless and liberals.

Need one or more questions about living in a community of non traditional units such as a small home community that consists of mostly factory built/prefab units of no more than 900 sq ft. These would be new 'mobile home' type parks.

Horizontal mixed-use zoning of areas targeted for housing development could be helpful.

you completely missed the lower rung steps of owning a home here in plantation country the "Mobile Home Parks"

We need police and sidewalks.

Number one issue is the substance abuse and mentally ill. Need safe sober program housing with 24 hour security, possibly locked facilities. We often see vulnerable people who clearly cannot care for themselves that are often violated as they are easy targets.

Access to safe drinking water. Education on land use/septic systems.

Transitioning less desirable neighborhoods into desirable neighborhoods would be a positive in Stanislaus County. Parks need to be cleaned up, maintained, and have security so kids can actually play at them. I wish the county would stop allowing more shopping centers to be built and leaving other ones vacant, and I wish the county would have a plan of action in regards to homelessness by building more housing for them in parts of the county and not allowing tents to be plopped up everywhere and anywhere.

Families might be best supported if job, child care and housing were taken in consideration at the same time. Parents want to provide for their children but these 3 things tend to be connected. One w/o the other makes it hard to thrive in this community.

Revisit the base line income for low income housing it's awful low there are potential homeowners left out as they are not considered low income . They fall between the gap.

Based on income- There should be a question related to whether individuals are spending more than half of their monthly after-tax income on housing payments or rent. The reality is if a person makes under \$50,000 per year, they are spending approx. 3/4 of their income on a 2-bedroom home or apartment in most cases. The problem is all of these things but also how to ensure people are not living paycheck to paycheck thus causing a family to become homeless when an emergency occurs.

homeless are really becoming an issue next to the VFW. Very poor conditions. Violent, trespassing, theft, unsanitary, noisy, drugs/drug paraphernalia. Please keep the area clean and a nice place to live-remove them. it is not safe or my children or elders. even on our own property we come face to face, very scary. Please start with homeless removal before any development plans. Homes are being robbed as it is. cant imagine all the theft on a jobsite nearby. thanks.

State mandates for new housing will continue to make housing less affordable in CA.

I think that landlords need to be held better accountable for not being good landlords. For example, I've been paying rent at my place of residence for over 10 years now. Out of the 10 years, my shower in my bathroom is basically falling through the floor leaving it un-useable. I have not used my shower in my bedroom for over two years because my landlord says "I have not been able to find anyone who can repair that. COVID has made contractors/repair men less available". Can you believe that? So essentially I've been paying for a bathroom I CANNOT USE! Plus, the rent has increased. How is this fair?

Education for homeowners on how to find the right contractor, landscaper, plumber, electrician, etc.

I teach college. My students are having trouble finding places to live with affordable rents. This even applies to my students who are graduates with teaching jobs. They can barely afford their rent, even though they are working full time. The option to buy a home should be open to all essential workers!!

A HUGE overhaul of the Housing Authority is needed - a in-depth audit of all units such as: how many years has a family lived in a unit? when was the last time the applicant's application was reviewed? Considering implementing a limit on the years a unit is occupied, because I know of families who decades later are still living in the same units.... basically milking the system while our homeless families and veterans struggle. The reviews on Google should be a HUGE indicator of the ongoing issues at the Housing Authority - see below. Housing Authority of Stanislaus County 1701 Robertson Rd, Modesto, CA 2.7 (OUT OF 5.00, THIS IS A VERY LOW SCORE) 71 reviews

Buckle down, and enforce the homeless laws! Do not allow homeless to set up "tent cities" or live in their vehicle!!! The biohazards and health hazards the homeless create are so overwhelming in our once beautiful county! As a result of the homeless, living wherever they want, all I see is garbage & trash heaps, land deterioration, areas in downtown where homeless have openly defecated in flowerbeds! Our community is not a open toilet, or rubble pile! We are a family oriented community with hard working families and children to raise! Children and adults alike should NOT be subjected

to seeing filth, squaller, and makeshift “homes” because transients refuse to abide by simple regulations, rules and laws!!! I can go on..... however I’m sure I’ve made my statement clear, and I don’t stand alone!!!

Rent costs are not equivalent to the current income guidelines for people in rural areas.

More Questions about Homeless Suggestions

I think that if anyone pays rent, always on time and paid in full that there should be programs that take that into consideration for buying their own home. Rent often times is higher than a mortgage. If someone is consistently paying rent that is high, then why shouldn’t that be considered on a loan application? Makes no sense.

I would like to see more affordable housing options available (Rent/Own) within the county. I would like to see both high end and lower income Apartment/Condominium units become available in the county. Higher density, smaller, affordable units.

Community oriented solar/charging incentives for unincorporated homes. Were limited to only statewide option, the ones without city backed options

Zoning violations and non-permit building common in my area.

Housing for homeless - convert abandoned motels, make tiny home (like mobile home parks) for homeless. Affordable spaces that they can live in, that do not create the issues "homeless camps" along streets/highways do.

Home ownership incentives for new/existing homeowners purchasing homes within 30 miles of their workplace, keeping residents local.

Instead of allowing people to take advantage of the services when they don’t need them they should expire. So many people are getting help with housing, food, etc. and taking advantage and will do this for the remainder of their lives and then their kids will do the same. Make an expiration date and make people get jobs and help the people that really need it but can’t get it due to the people taking advantage. Most of these people are living beyond the means of two working parents.

Rent is unaffordable and increasing the max every year Too hard to buy a house can't save money

Deal with slumlords and dilapidated housing

Question 16: Please identify which part of unincorporated Stanislaus County you identify with as your residence

Question 16 asked respondents to select their community from a list of 23 unincorporated communities in Stanislaus County, as well as offering an “Other” option. The results are listed below in Table 24.

Table 24 Results for Question 16

Community	Total % of Respondents
Other	33%
West Modesto	24%
Salida	8%
South Turlock	7%
Denair	6%
Empire	5%
Crows Landing	5%
North Ceres	3%
South Ceres	2%
Airport	2%
Bret Harte	2%
Valley Home	2%
Hickman	1%
Knights Ferry	1%
Westley	1%
Cowan Tract	0%
Del Rio	0%
Diablo Grande	0%
Grayson	0%
Keyes	0%
La Grange	0%
Monterey Park	0%
Riverdale Park	0%
Parklawn	0%

A total of 36 custom responses were received and are listed below in Table 25.

Table 25 Custom Responses for Question 16

NE Modesto
South East Modesto
Modesto
I work in Stanislaus County with Seniors & Homeless, I live outside the county
n/a not near unincorporated. area, but own rentals in the Airport area.
north east Modesto
Riverbank
Riverbank
Oakdale
Live in Modesto
Between Oakdale and Riverbank
not an unincorporated resident
City of Modesto
Newman
Hughson
Northeast Modesto
North East Modesto
Newman
Riverbank area
We live in North East off Scenic Dr
Oakdale
Waterford
Oakdale
East Modesto
Woodland West
Downtown Modesto/College Area
Village One
East of Modesto
Oakdale
Scenic dr.
Modesto
Don't live in unincorporated area
Riverbank
Turlock
Modesto
Ceres

This page intentionally left blank.

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

This page intentionally left blank.

Attachment 3

Community Engagement Materials

2023-2031 Housing Element Update

Welcome!

Stanislaus County has kicked off an update to the Housing Element to plan for housing through 2031. The update is scheduled for completion at the end of 2023, and throughout the process, we invite the public to be part of the planning process and provide input on how Stanislaus County can support housing development over the planning period (2023-2031).

What is a Housing Element?

The purpose of the Housing Element is to identify and analyze existing and projected housing needs to support housing preservation, improvement, and development for all economic segments of the community.

What other elements are being updated? Why?

As part of the Project, the County will be conducting a technical update to the 2015 Stanislaus County General Plan with an update of the Safety Element and preparation of Environmental Justice policies.

Environmental Justice Element

Senate Bill 1000 (Leyva, 2016) amended Government Code Section 65302 to require that California cities and counties that have disadvantaged communities incorporate Environmental Justice policies into their general plans. The purpose of the law is to address the “unique or compounded health risks” in disadvantaged communities by decreasing pollution exposure, increasing community assets, and improving overall health. The Environmental Justice Element will:

- Address goals, policies, and programs pertaining to educational attainment, pollution burden of disadvantaged communities, and identification of burdensome quality of life metrics including poverty, unemployment, linguistic isolation, and health.
- Align with the Governor’s Office of Planning and Research Guidelines for Environmental Justice
- Rely on CalEnviroScreen 4.0 to determine areas of concern regarding environmental justice issues.

Safety Element Update

The Safety Element identifies and includes policies and programs to reduce the impact of natural and man-made hazards that may threaten the health, safety, and property of Stanislaus County residents, business owners, and visitors. The State of California General Plan Guidelines state that the aim of the Safety Element is to reduce the potential risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, earthquakes, landslides, and other hazards. The Safety Element Update will:

- Ensure consistency with other General Plan elements
- Ensure compliance with State law
- Incorporate information from the Draft 2022 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, with an understanding that the existing plan is currently in the update process
- Address AB 747, General Plan Safety Elements; SB 99, Safety Elements, Emergency Evacuation Routes; SB 379, Climate Adaptation and Resiliency; SB 1035, General Plans; and SB 1241, Fire Hazard Impacts.

2023-2031 Housing Element Update

Meeting Our Housing Goals

What is the Regional Housing Needs Allocation?

In the process of updating the Housing Element, each jurisdiction, city, and county is required to accommodate its fair share of the regional housing need. The Regional Housing Needs Allocation (RHNA) is the process used to determine housing allocations for each jurisdiction. As part of the RHNA, HCD determines the total number of housing units needed across California over the next decade. The Stanislaus Council of Governments (StanCOG) is then tasked with developing a methodology to determine the number of housing units for each incorporated and unincorporated jurisdiction in Stanislaus County, which is required to provide sites for housing. Under State law, the RHNA is assigned to the following four income categories which are based on a percentage of the Area Median Income (AMI):

Very Low Household Income (<50% AMI)

Low Household Income (51-80% AMI)

Moderate Household Income (81-120% AMI)

Above Moderate Household Income (>120% AMI)

In August 2022, StanCOG updated their methodology for RHNA allocations for each city in the county and for the unincorporated county. The table below shows the RHNA goals assigned to each jurisdiction. Stanislaus County is responsible for the RHNA requirement related to the unincorporated county. As shown, the County must provide for residential capacity through zoning to accommodate 2,475 new units, including 574 very low-income units and 398 low-income units. To meet very low- and low-income unit goals, the County must identify sites adequate for residential development that allow for development at 20 dwelling units per acre.

Cycle 6 Final Adopted Methodology Summary Table

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



2023-2031 Housing Element Update

The Sites Inventory Process

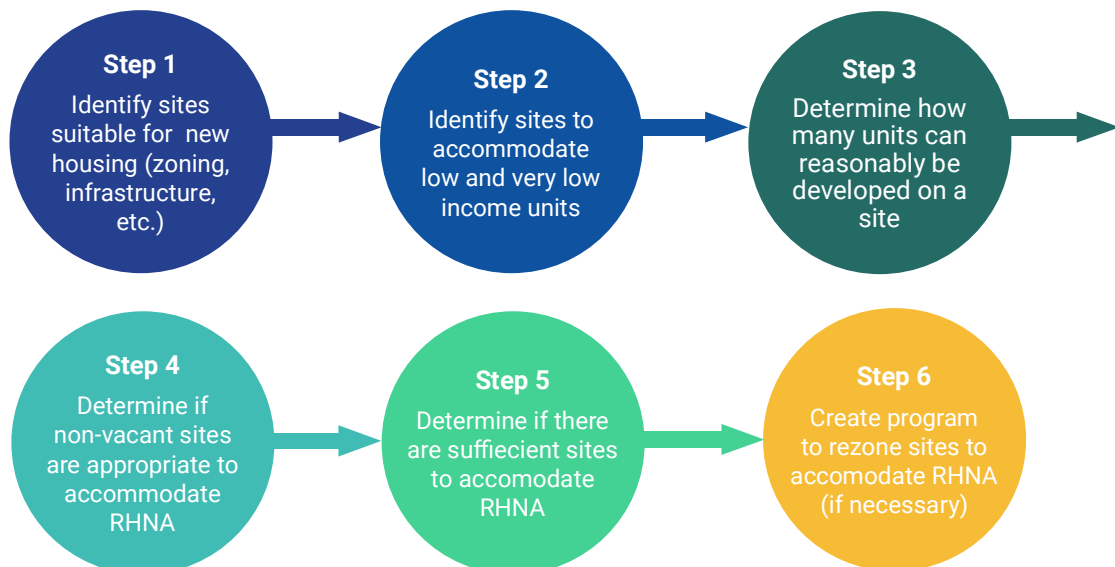
The site inventory is a required component of the Housing Element used to identify specific sites to meet the RHNA allocation for the unincorporated county. The sites inventory process is a labor-intensive and potentially controversial component of the Housing Element Update. Stanislaus County will need to evaluate General Plan land uses and the zoning code to determine whether there is enough land available to accommodate the assigned RHNA allocation for each income category. If unable to accommodate the RHNA, the County will need to plan to rezone enough land to meet the RHNA obligation.

Sites or credits in the inventory can include:

- Housing projects under review or approved through Planning and expected to be built during the planning period
- ADU trends
- County-owned sites with housing in line with County goals
- Residentially zoned vacant sites or non-vacant sites with redevelopment potential
- Sites that would be rezoned to permit residential uses or higher density

Site considerations:

- Environmental constraints and utility access
- Redevelopment potential/feasibility
- Sites identified for lower income must meet density and site requirements
 - » Appropriate density: 20 units per acre
 - » Appropriate parcel size: between 0.5 and 10 acres
 - » Access to high performing schools, jobs, amenities (i.e., parks and services), health care facilities, and grocery stores



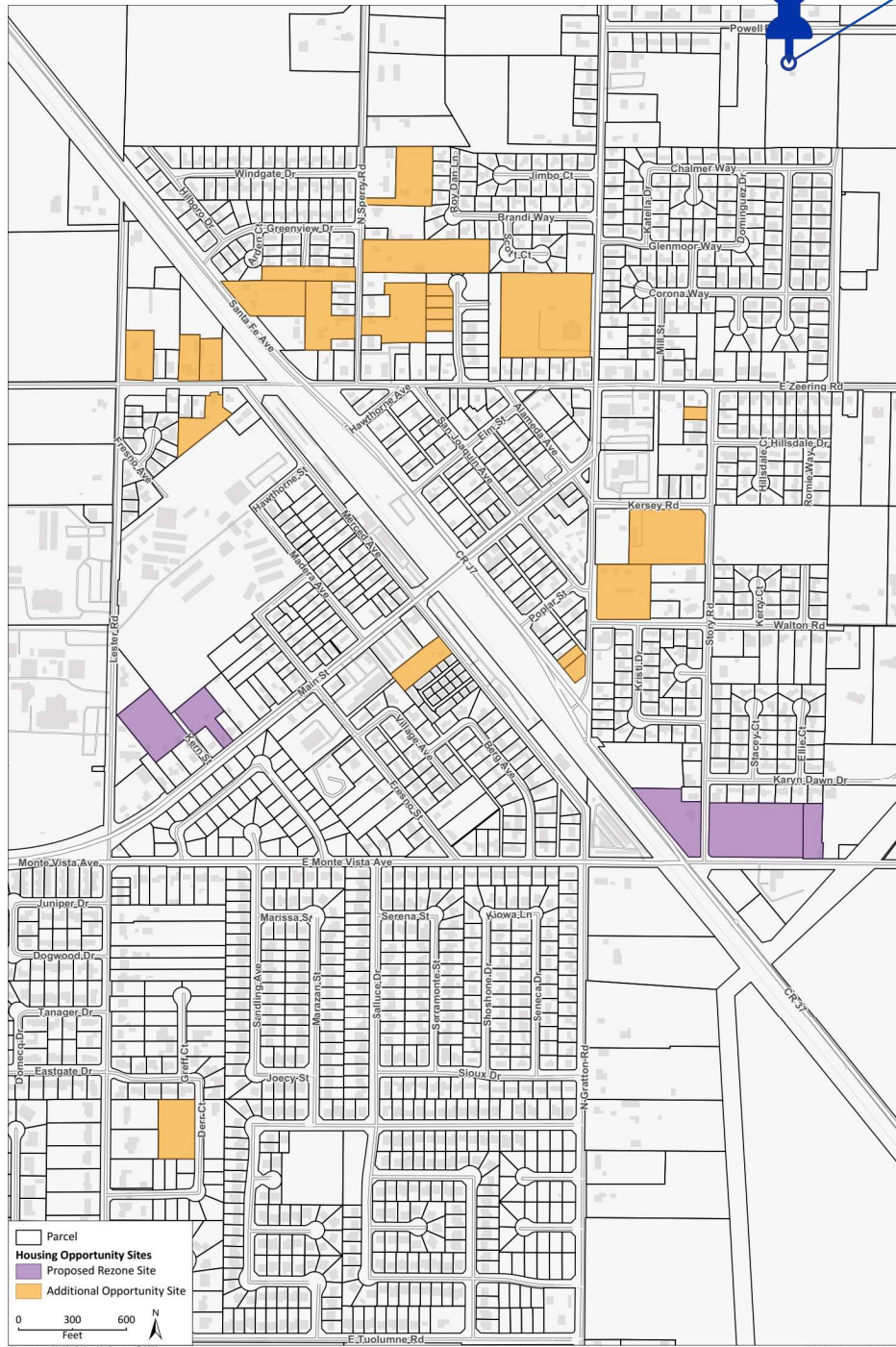
2023-2031 Housing Element Update

Where should new housing be built in Denair?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!

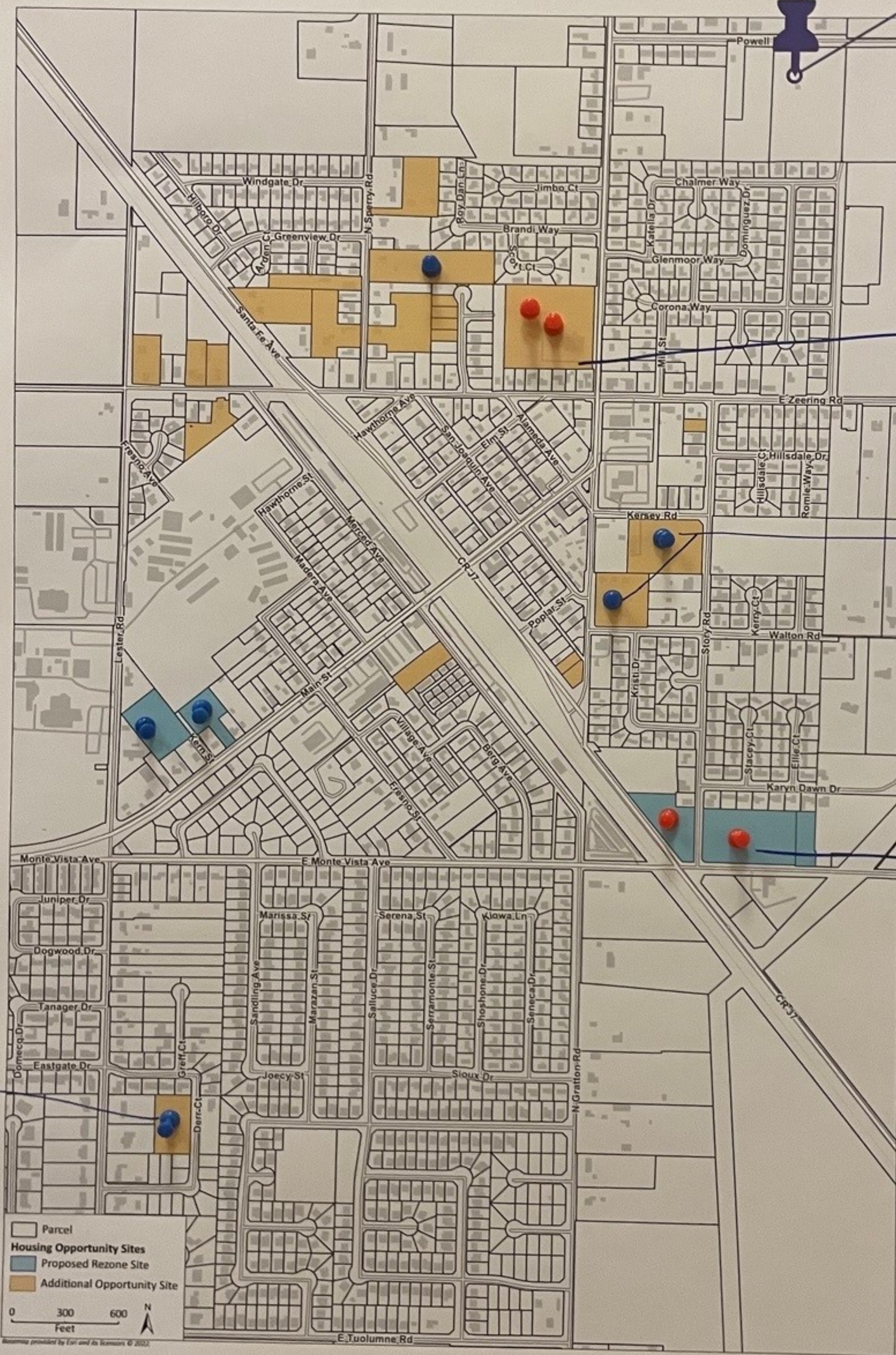


2023-2031 Housing Element Update

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!

Accessible to
Amtrak station
as expansion completes



Existing church size

—Kim - good in-fill near center of town (library, P.O., etc.)

Traffic Concerns

Kim -
Good in-fill near
other houses and main
thoroughfare

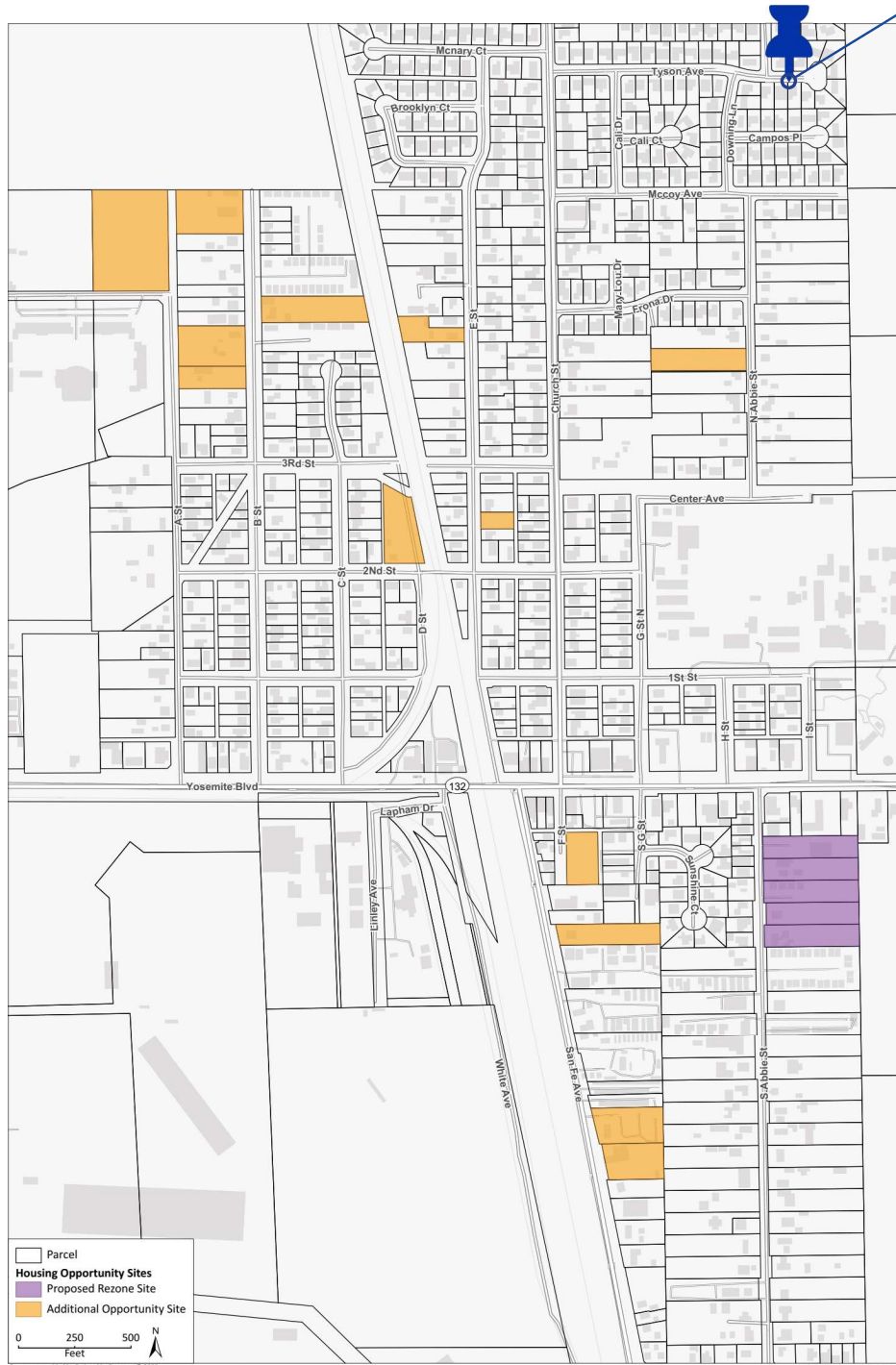
2023-2031 Housing Element Update

Where should new housing be built in Empire?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site

Parcel

Housing Opportunity Sites

Proposed Rezone Site

Additional Opportunity Site

0 550 1,100 Feet

N

River Rd

Grayson Rd

Frank Cox Rd

Rogers Rd

Highway 33

Howard Rd

W. Main St

W. 2nd St

W. 3rd St

W. 4th St

W. 5th St

W. 6th St

W. 7th St

W. 8th St

W. 9th St

W. 10th St

W. 11th St

W. 12th St

W. 13th St

W. 14th St

W. 15th St

W. 16th St

W. 17th St

W. 18th St

W. 19th St

W. 20th St

W. 21st St

W. 22nd St

W. 23rd St

W. 24th St

W. 25th St

W. 26th St

W. 27th St

W. 28th St

W. 29th St

W. 30th St

W. 31st St

W. 32nd St

W. 33rd St

W. 34th St

W. 35th St

W. 36th St

W. 37th St

W. 38th St

W. 39th St

W. 40th St

W. 41st St

W. 42nd St

W. 43rd St

W. 44th St

W. 45th St

W. 46th St

W. 47th St

W. 48th St

W. 49th St

W. 50th St

W. 51st St

W. 52nd St

W. 53rd St

W. 54th St

W. 55th St

W. 56th St

W. 57th St

W. 58th St

W. 59th St

W. 60th St

W. 61st St

W. 62nd St

W. 63rd St

W. 64th St

W. 65th St

W. 66th St

W. 67th St

W. 68th St

W. 69th St

W. 70th St

W. 71st St

W. 72nd St

W. 73rd St

W. 74th St

W. 75th St

W. 76th St

W. 77th St

W. 78th St

W. 79th St

W. 80th St

W. 81st St

W. 82nd St

W. 83rd St

W. 84th St

W. 85th St

W. 86th St

W. 87th St

W. 88th St

W. 89th St

W. 90th St

W. 91st St

W. 92nd St

W. 93rd St

W. 94th St

W. 95th St

W. 96th St

W. 97th St

W. 98th St

W. 99th St

W. 100th St

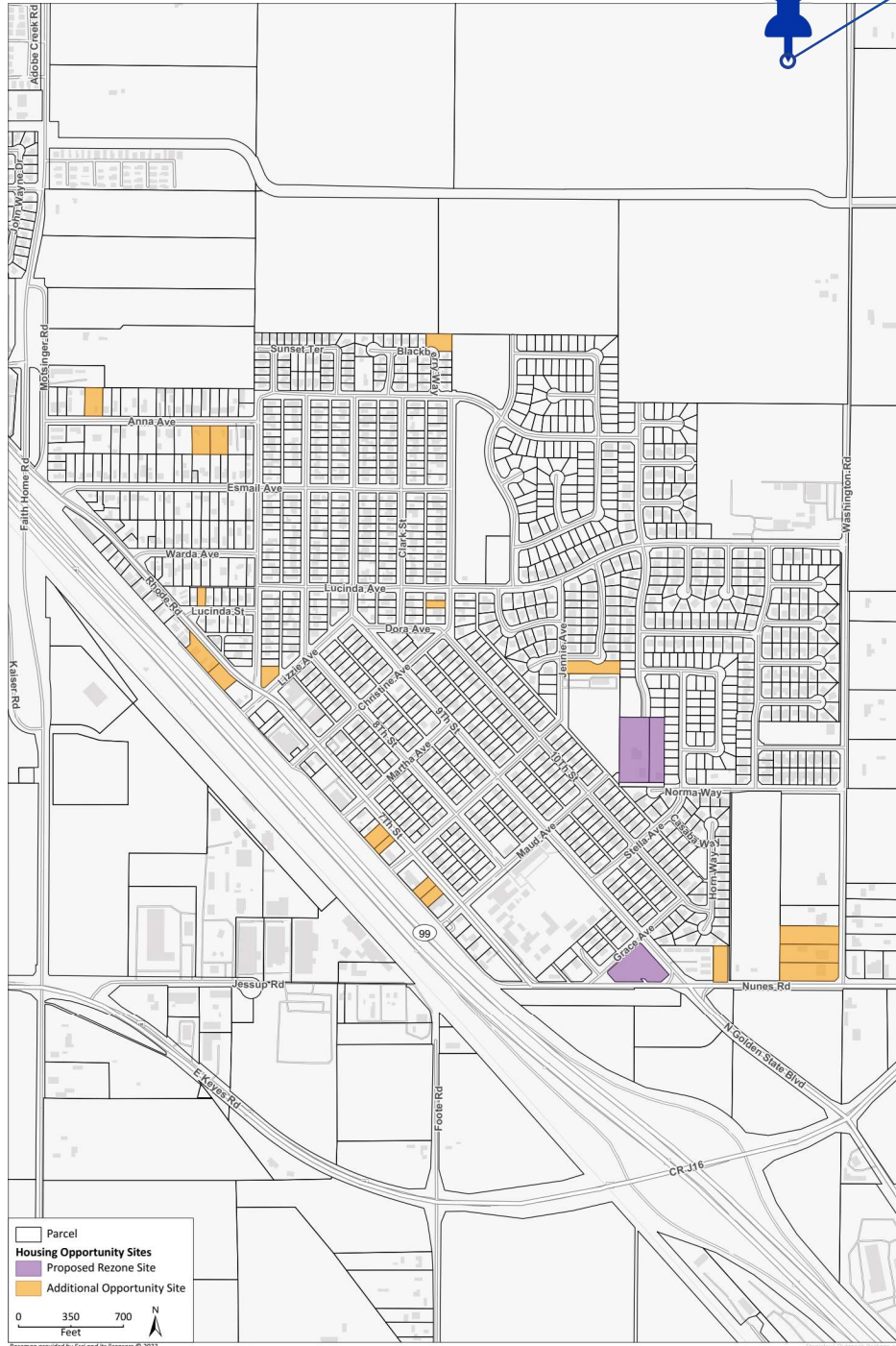
2023-2031 Housing Element Update

Where should new housing be built in Keyes?

Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



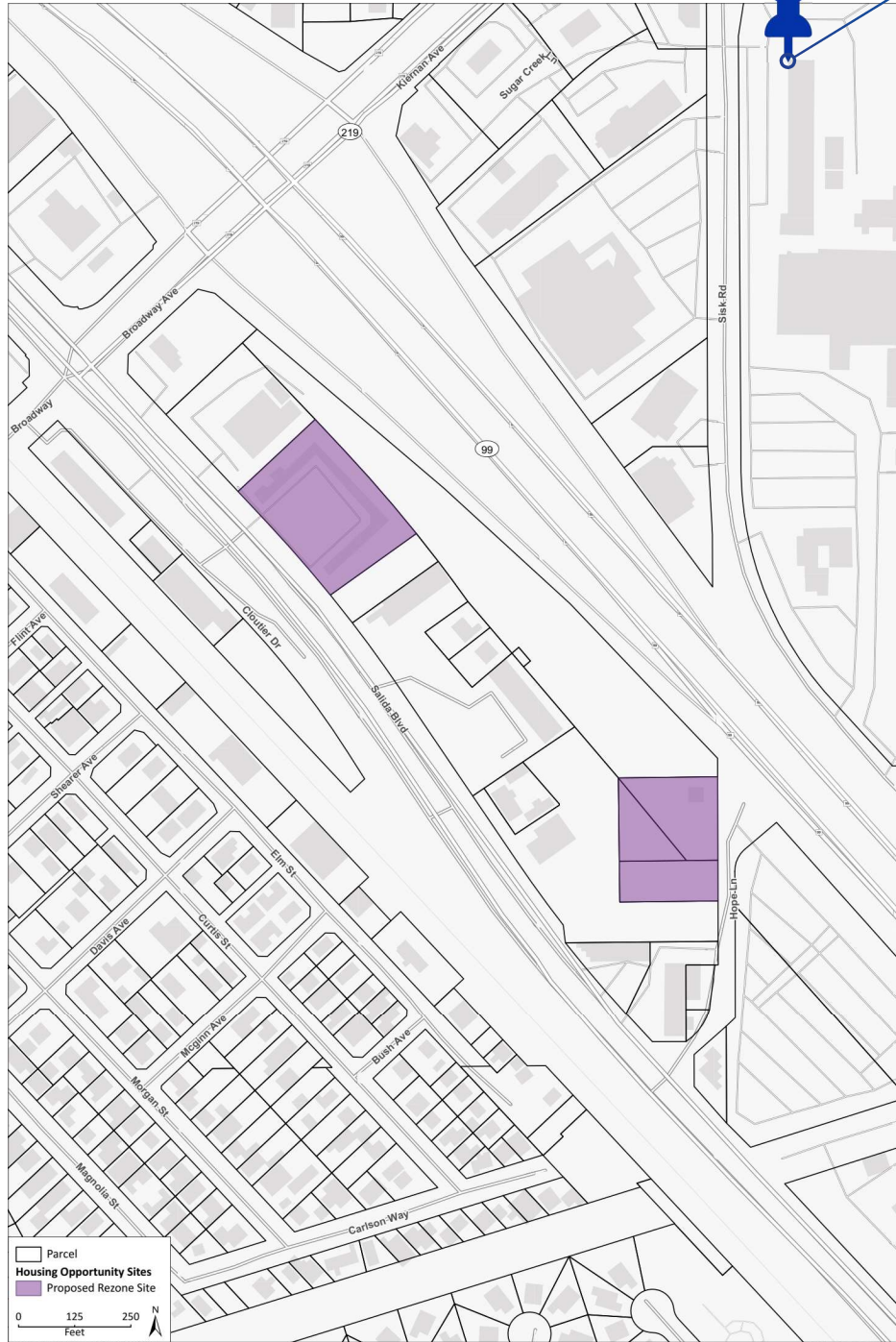
2023-2031 Housing Element Update

Where should new housing be built in Salida?

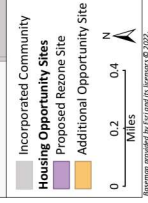
Blue Pin = You agree with the proposed site or suggest a new site

Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!

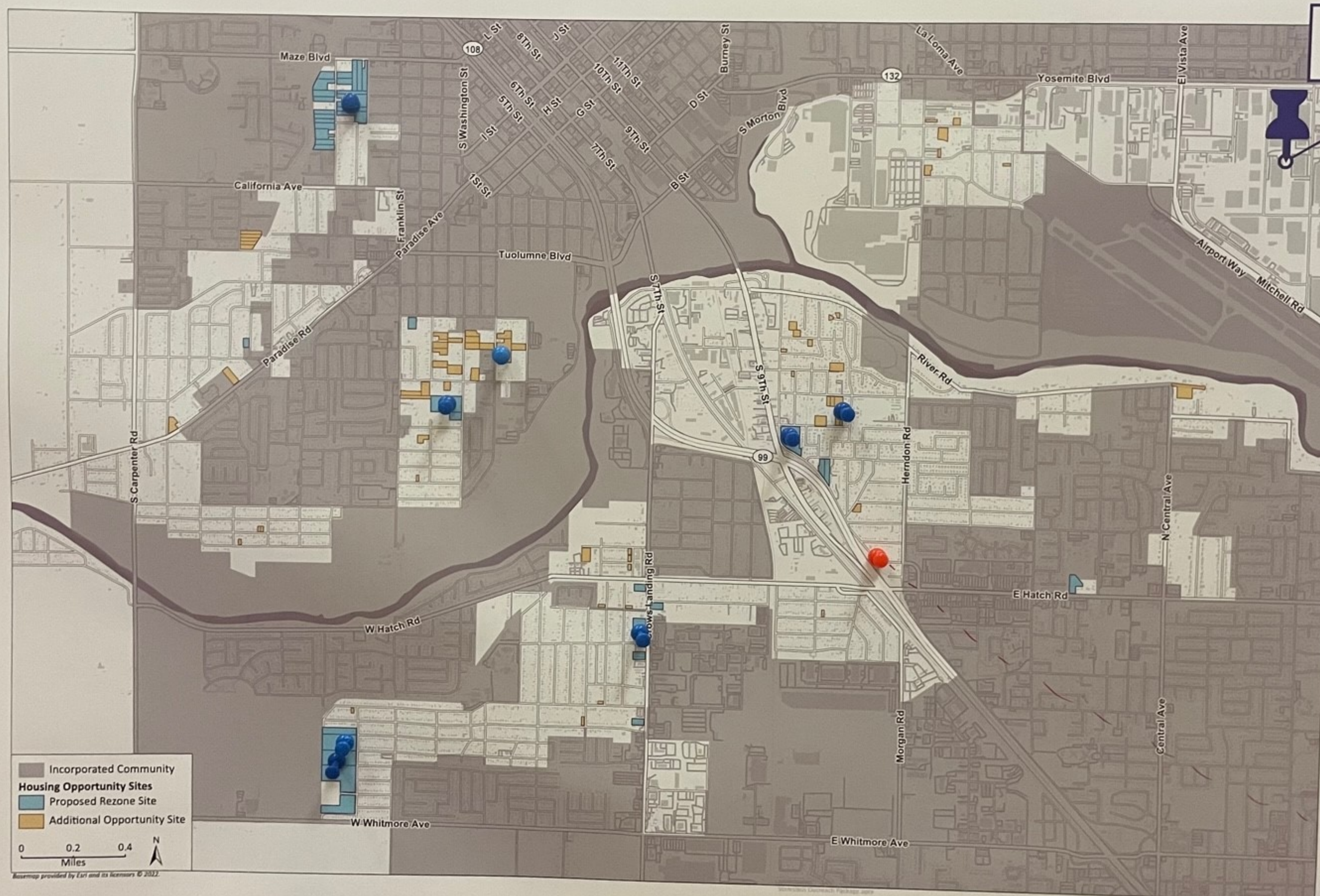


Blue Pin = You agree with the proposed site or suggest a new site
Red Pin = You disagree with the proposed site



Red Pin = You disagree with the proposed site

Draw a line from your pin and write in the margin to tell us more!



New girls stations / on ramp / street issues
would have effect on already crowded corners

2023-2031 Housing Element Update

Climate

What resources do you use to adapt to the events listed below?

What public resources do you wish were available to help you adapt to these events?



Wildfires and Poor Air Quality



Heat Waves



Drought

2023-2031 Housing Element Update

What is Environmental Justice?

Environmental Justice is a concept focused on improving the unequal environmental burden placed on disadvantaged communities, especially minority populations.

Environmental Justice and the General Plan

Senate Bill 1000 amended Government Code Section 65302 to require that California cities and counties that have disadvantaged communities incorporate Environmental Justice policies into their general plans, either in a separate element or by integrating related goals, policies, and objectives throughout the other elements. The purpose of the law is to address the “unique or compounded health risks” in disadvantaged communities by decreasing pollution exposure, increasing community assets, and improving overall health. The Environmental Justice Element address the following themes:

**Pollution
Exposure and
Air Quality**

**Safe and
Sanitary
Homes**

Food Access

**Physical
Activity and
Health**

**Public
Facilities**

**Civic
Engagement**

Environmental Justice in Stanislaus County

Stanislaus County is in the process of developing Environmental Justice policies as part of the County’s General Plan Update. The Environmental Justice Policy Framework has been developed to identify key topics that will be addressed within the County’s Environmental Justice policies.



2023-2031 Housing Element Update

Environmental Justice Policy Framework #1

Pollution Exposure

- Drinking Water Quality
- Pesticide Pollution
- Lead Exposure from Housing
- Exposures from Hazardous Waste/Solid Waste Sites

Safe and Sanitary Homes

- Housing Rehabilitation Programs
- Overcrowding
- Cost of Housing and Rent

Food Access

- Improving Food Deserts
- Low-Income Food Resources
- Grocery Store/Supermarket Access
- Farmer's Markets and Community Gardens

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?



Pollution Exposure



Safe and Sanitary Homes



Food Access

2023-2031 Housing Element Update

Environmental Justice Policy Framework #2

Physical Activity and Health

- Asthma Rates
- Cardiovascular Disease
- Nutritional Education
- Healthcare Facilities Access (Hospitals, Clinics, etc.)

Public Facilities

- Expanding Bikeways and Improving Walkability
- Public Transportation Improvements
- Access to Parks

Civic Engagement

- Public Meeting Translation Services
- Use of Technology in Engagement
- Information sharing through schools, churches, and community centers

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

 Physical Activity and Health

 Public Facilities

 Civic Engagement

2023-2031 Housing Element Update

Environmental Justice Policy Framework #1

Pollution Exposure

- Drinking Water Quality
- Pesticide Pollution
- Lead Exposure from Housing
- Exposures from Hazardous Waste/Solid Waste Sites

Safe and Sanitary Homes

- Housing Rehabilitation Programs
- Overcrowding
- Cost of Housing and Rent

Food Access

- Improving Food Deserts
- Low-Income Food Resources
- Grocery Store/Supermarket Access
- Farmer's Markets and Community Gardens

Are there other topics to include within the policy framework that you believe are important? For each topic, what details should we know about the Stanislaus community?

Pollution Exposure

- ✓ illegal dumping w/ neighborhoods + parks/green space + ALLEYS
- ✓ Factory/agriculture air impacts

Safe and Sanitary Homes

Affordable Housing

- ✓ grant funding for homeowners secondary housing expansion "granny flats/tiny homes"

Housing Access & Availability is an issue, particularly for rental units. College students find it difficult to access housing they can afford.

Food Access

- ✓ Higher quality grocery stores w/ health focus wide foods fresh markets + trader joes

2023-2031 Housing Element Update

What's Next...

Upcoming Events

Community Workshop #3

The County will be holding a third Housing Element workshop later this year to discuss the development of housing goals, policies, and programs. The workshop will allow participants to provide input on the County's action plan for meeting housing needs through 2031. Visit www.stancounty.com/housingelement for more information.

Future Event Schedule



Get Involved!

Visit the Project Website

The project website is the hub for timely updates with information on the status of the project, announcements of upcoming events, and publication of key documents.

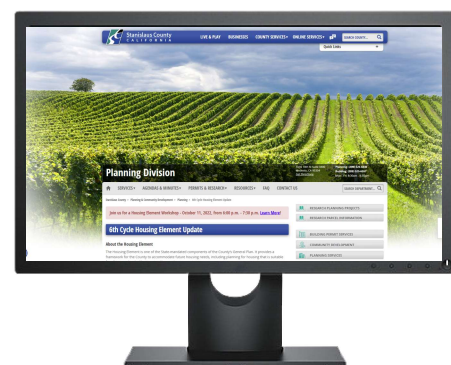
Sign-Up for Email Updates

You can join the email list on the project website. By signing up, you will be notified when the County releases new documents and announces meetings, workshops, and other events.

Join Meetings and Workshops

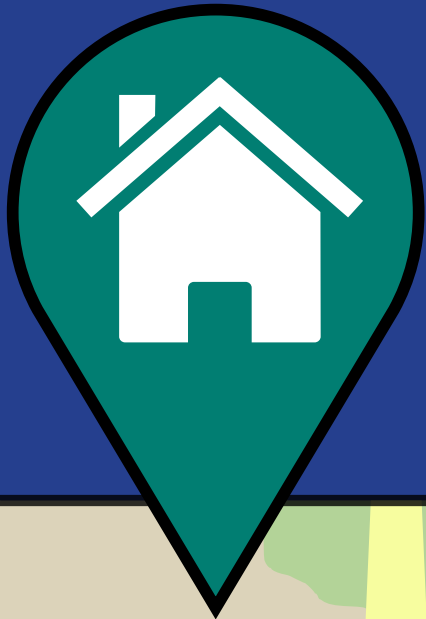
Not only are these great opportunities to learn about the Housing Element update, but meetings and workshops are also a great place to share your ideas and connect with the community.

Visit www.stancounty.com/housingelement for more information.



STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

Upcoming Community Workshop



Where should housing be built?

You can help answer this question and guide the future of housing in unincorporated Stanislaus County!

Questions?

Contact:

**planning@stancounty.com
209-525-6330**

Community Workshop

Tuesday, October 11, 2022

6:00 - 7:30 pm

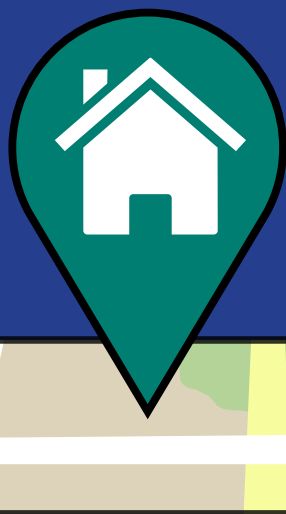
Ceres Community Center

2701 4th Street

Ceres, CA 95307

Visit: stancounty.com/housingelement

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.

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

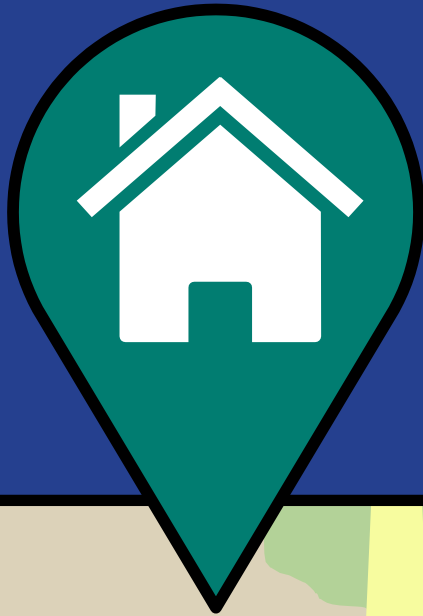
6:00 - 7:30 pm

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!

Taller Comunitario

martes, 11 de octubre, 2022

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**



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>

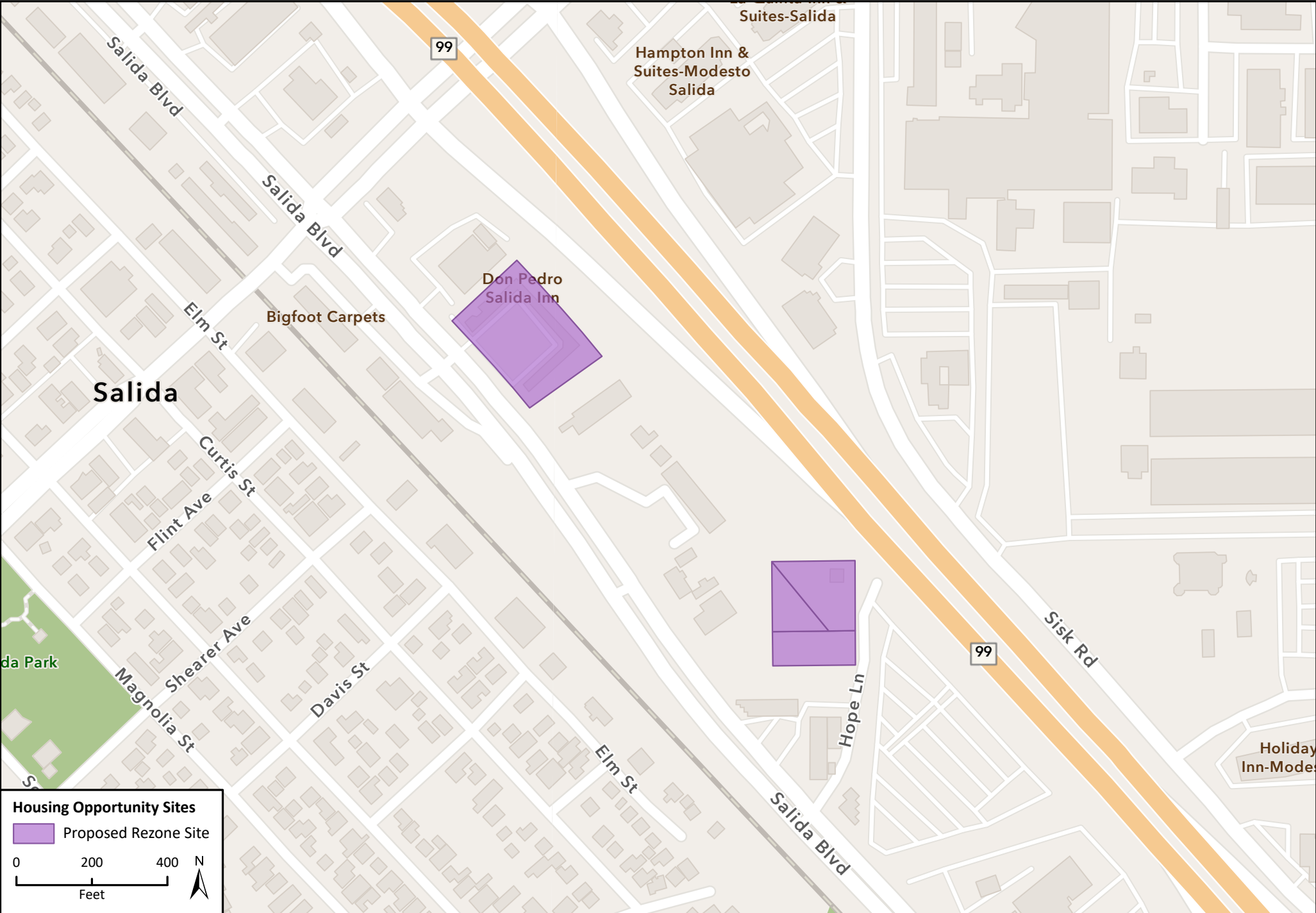


Complete the online mapping exercise: [English](#) | [Spanish](#)

Contents

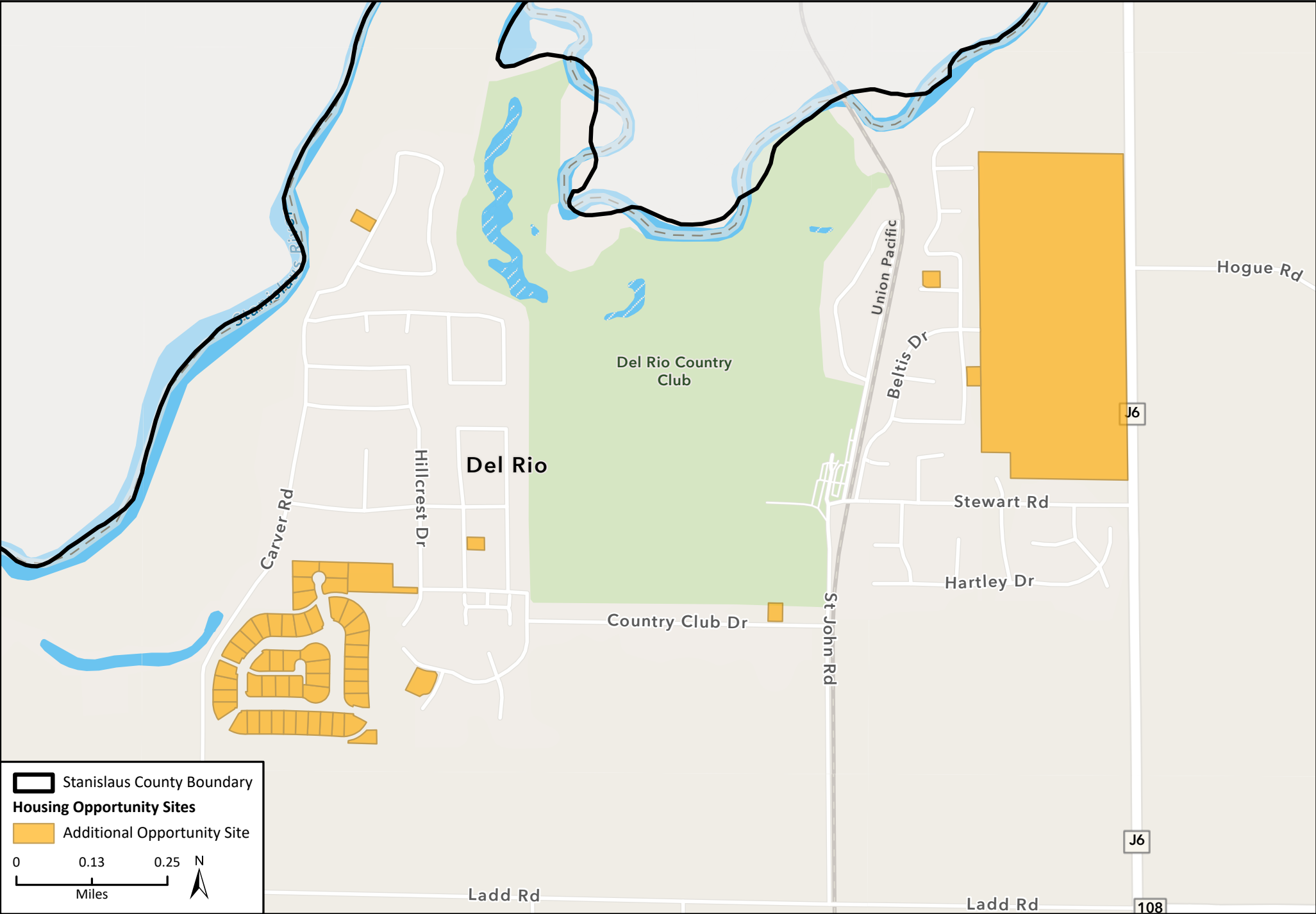
Salida..... 1
Del Rio 2
Empire 3
Southwest Modesto 4
Keyes 5
Denair 6
Grayson & Westley 7
Diablo Grande 8
Hickman..... 9

Proposed Housing Sites in Salida



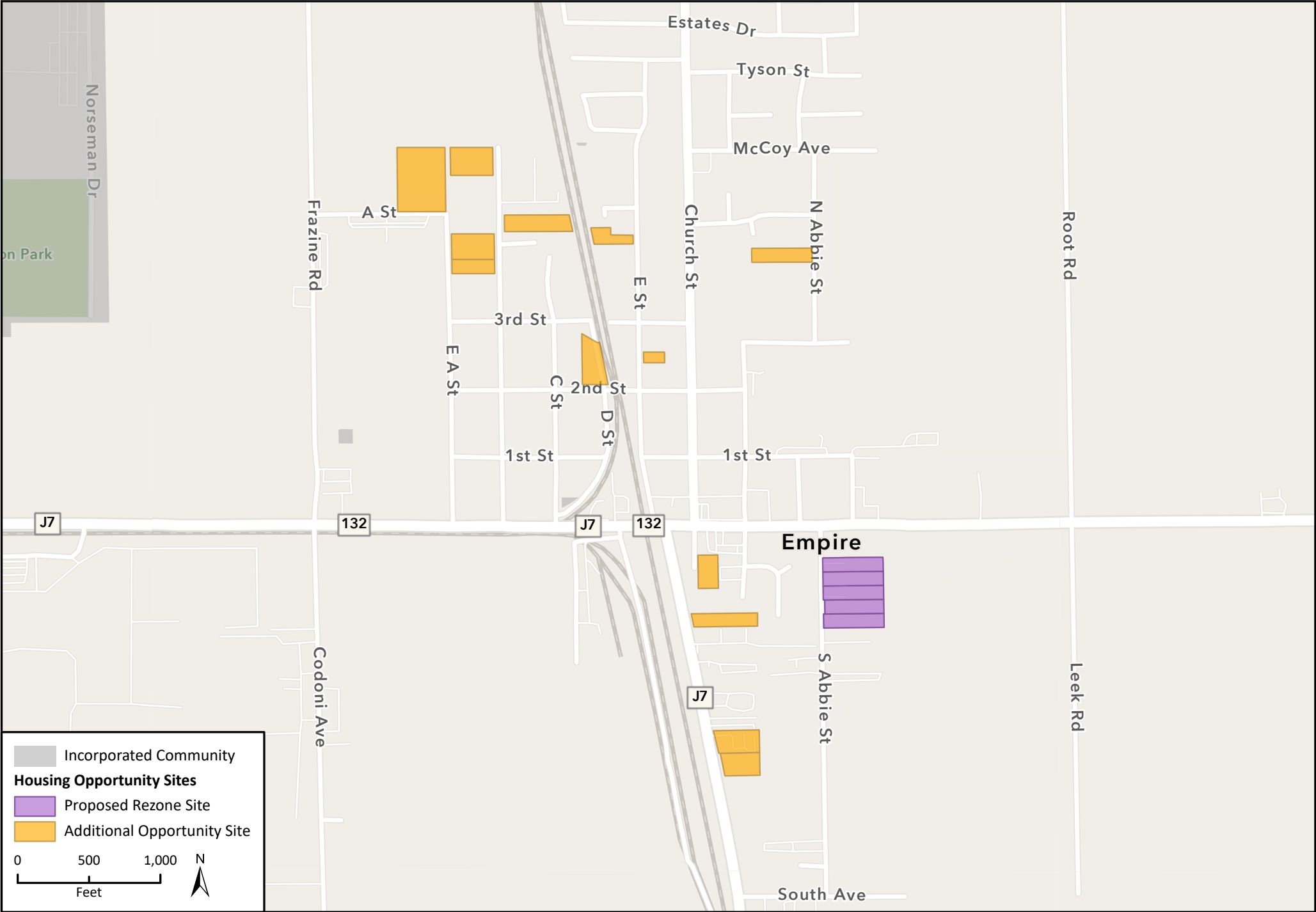
Basemap provided by Esri and its licensors © 2022.

Proposed Housing Sites in Del Rio



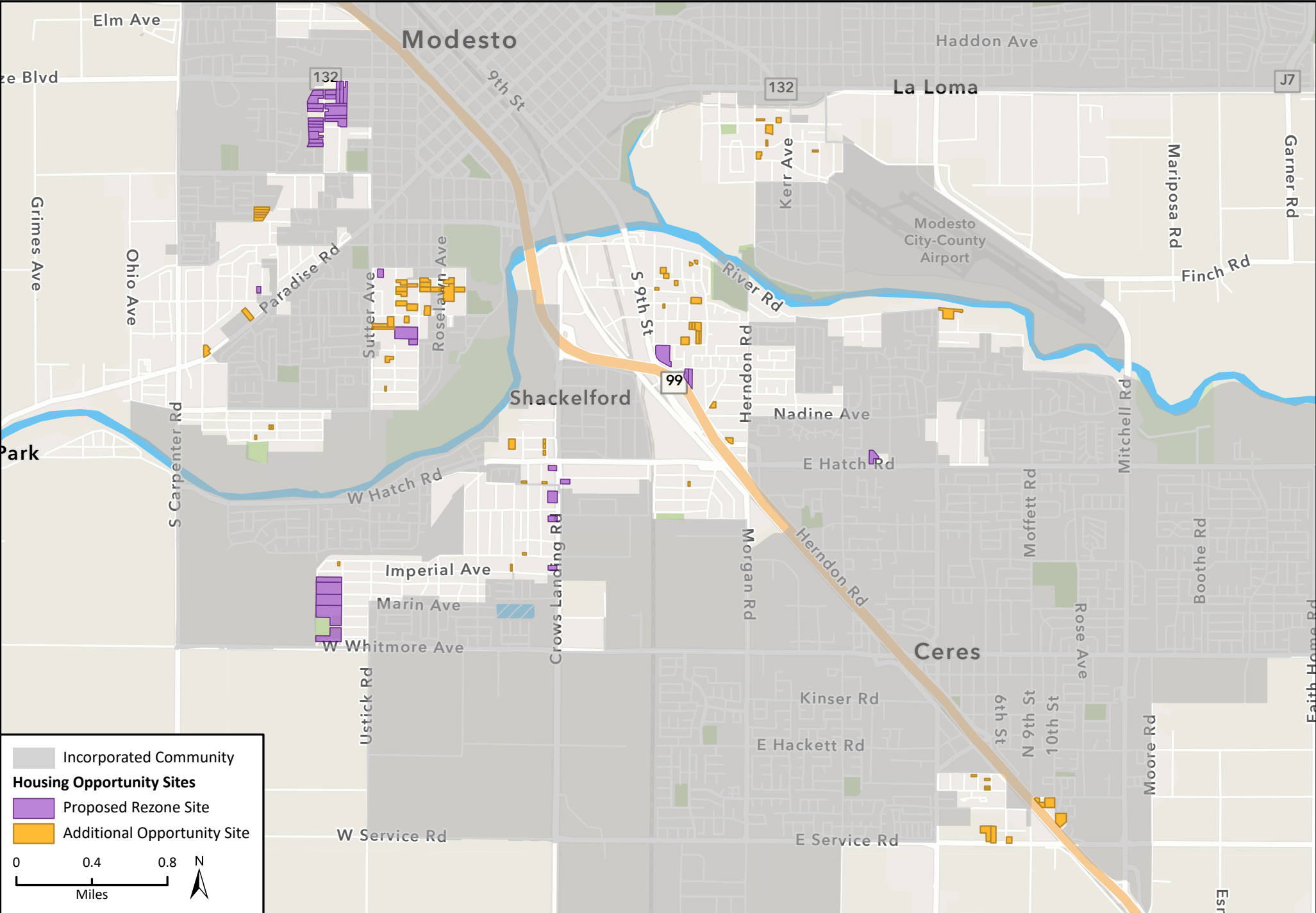
Basemap provided by Esri and its licensors © 2022.

Proposed Housing Sites in Empire



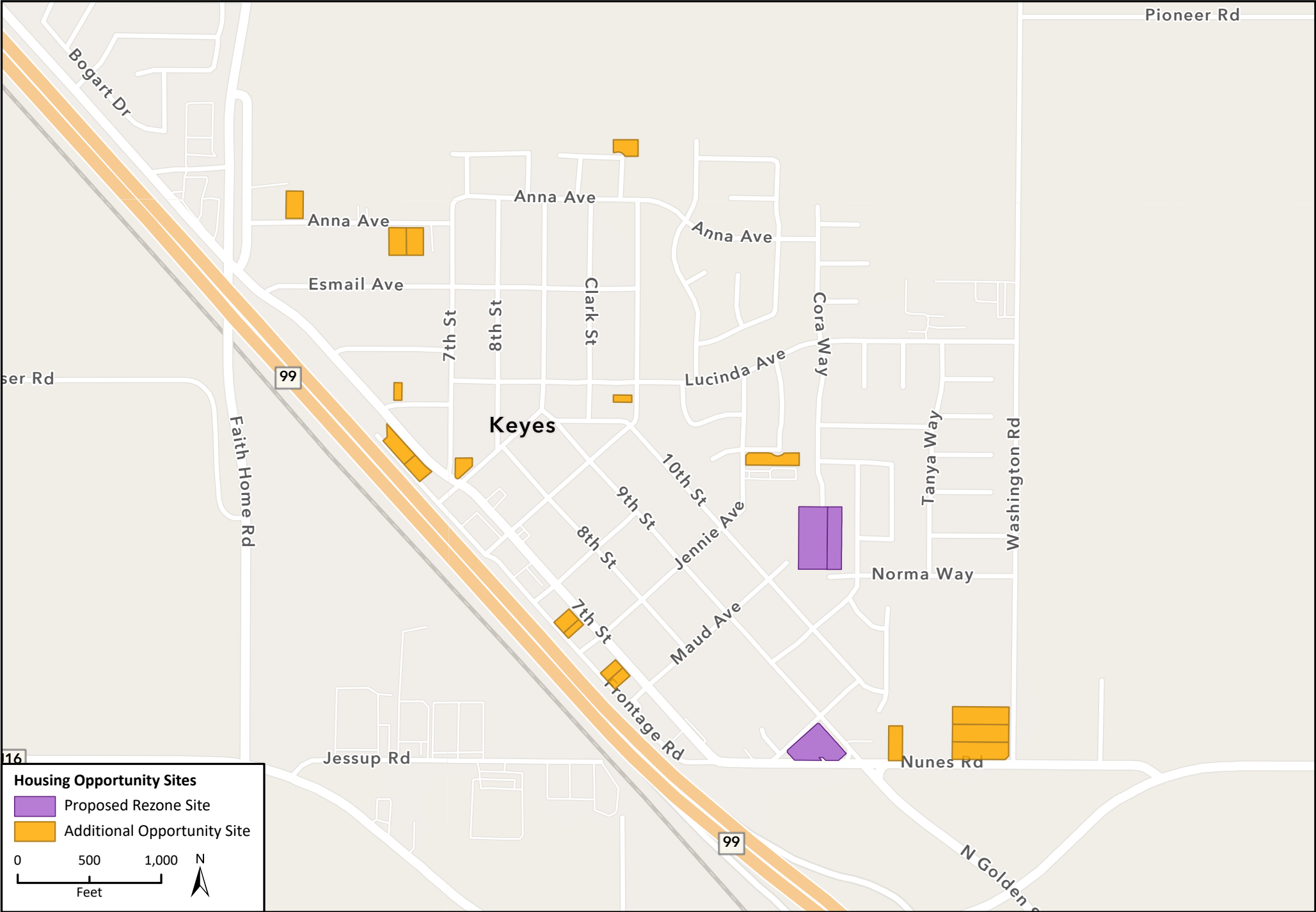
Basemap provided by Esri and its licensors © 2022.

Proposed Housing Sites in Southwest Modesto



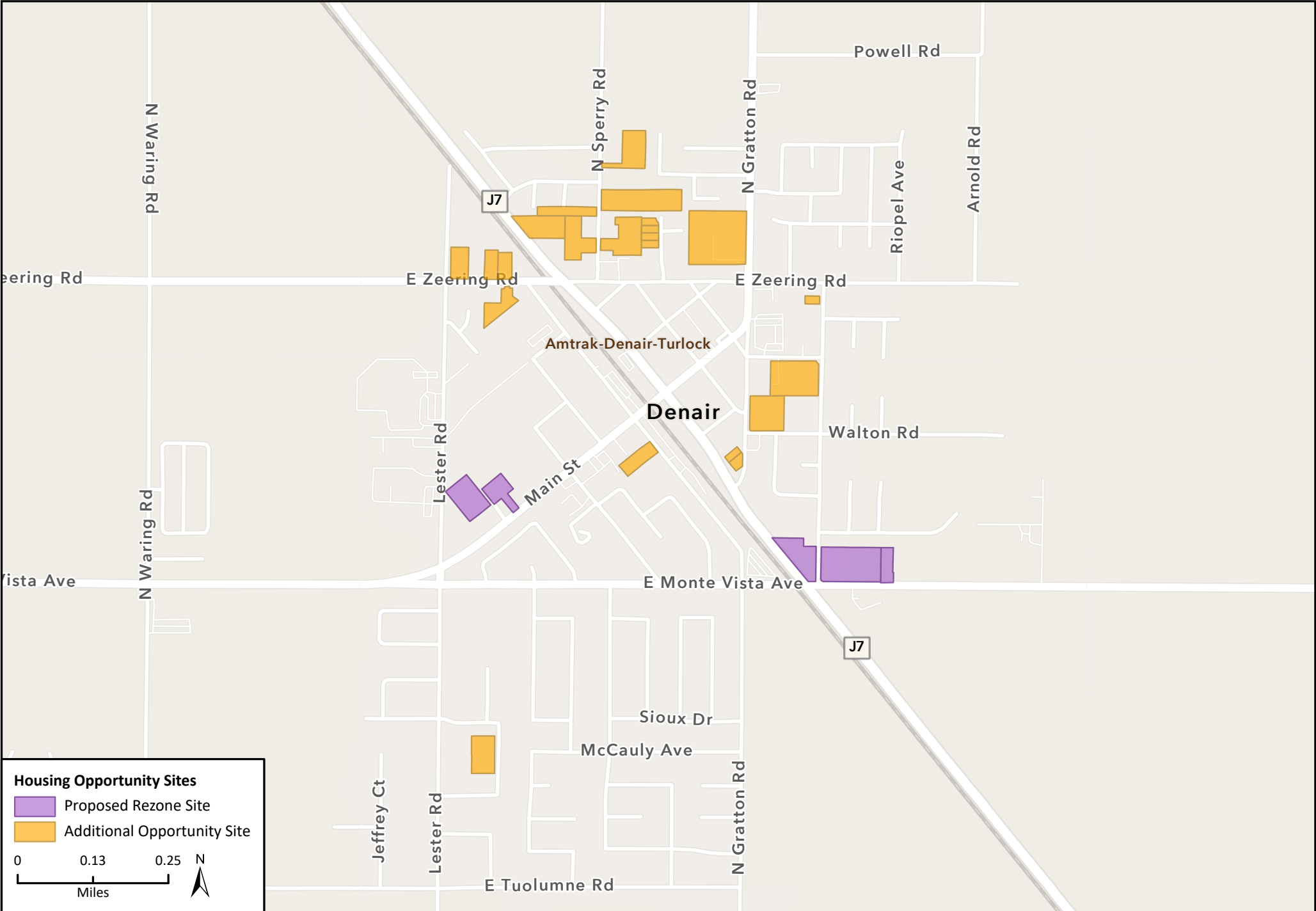
Basemap provided by Esri and its licensors © 2022.

Proposed Housing Sites in Keyes



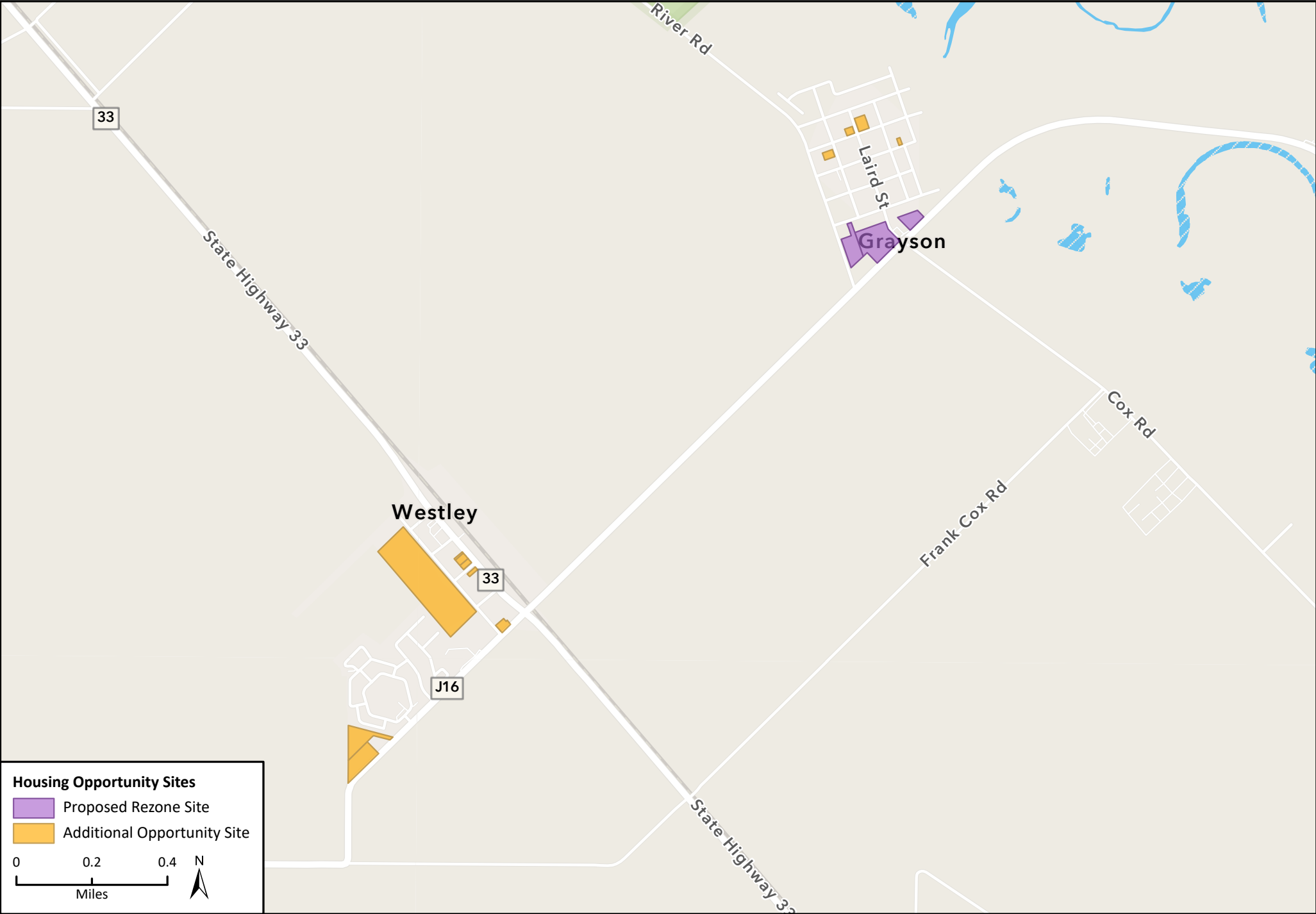
Basemap provided by Esri and its licensors © 2022.

Proposed Housing Sites in Denair



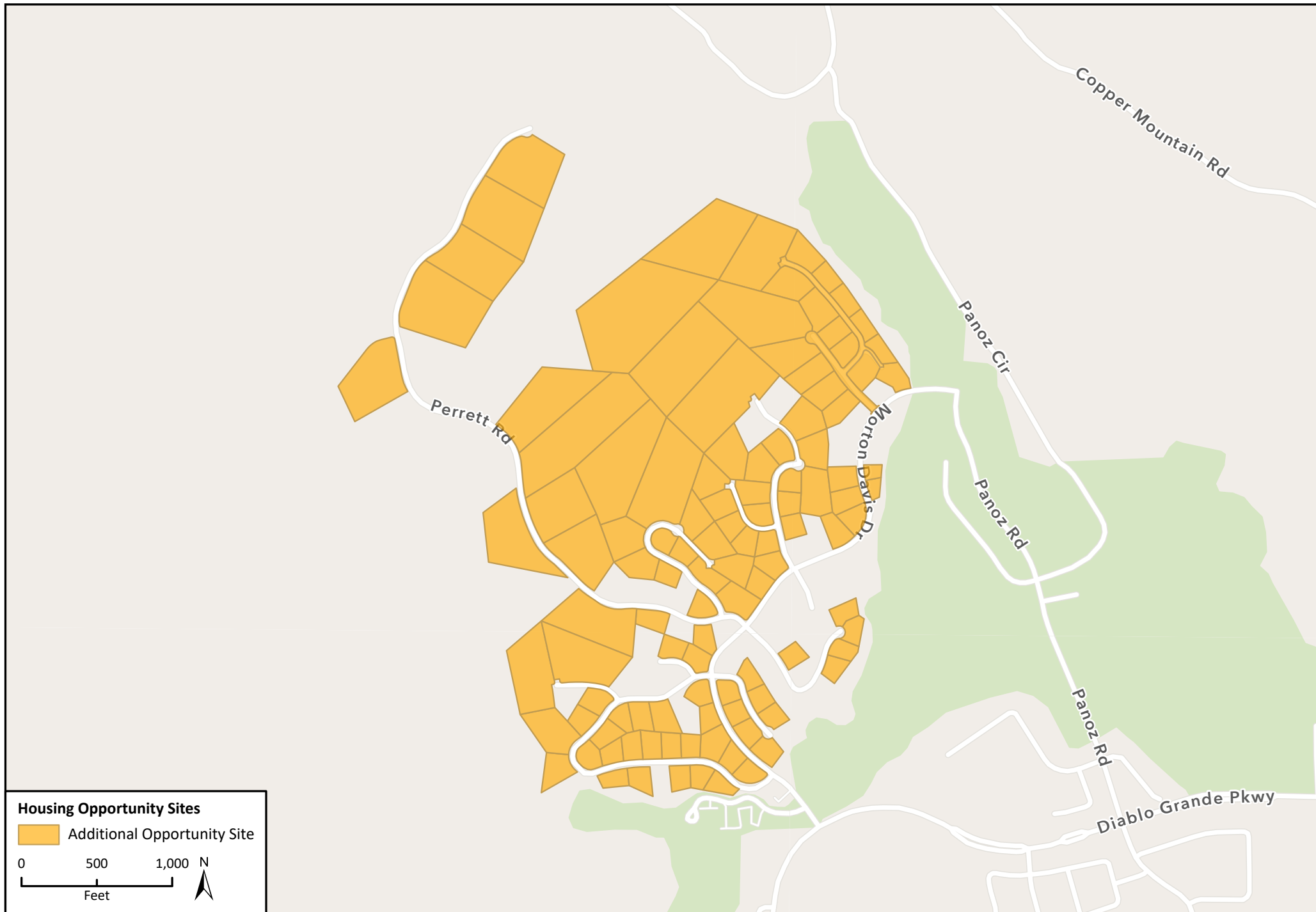
Basemap provided by Esri and its licensors © 2022.

Proposed Housing Sites in Grayson & Westley



Basemap provided by Esri and its licensors © 2022.

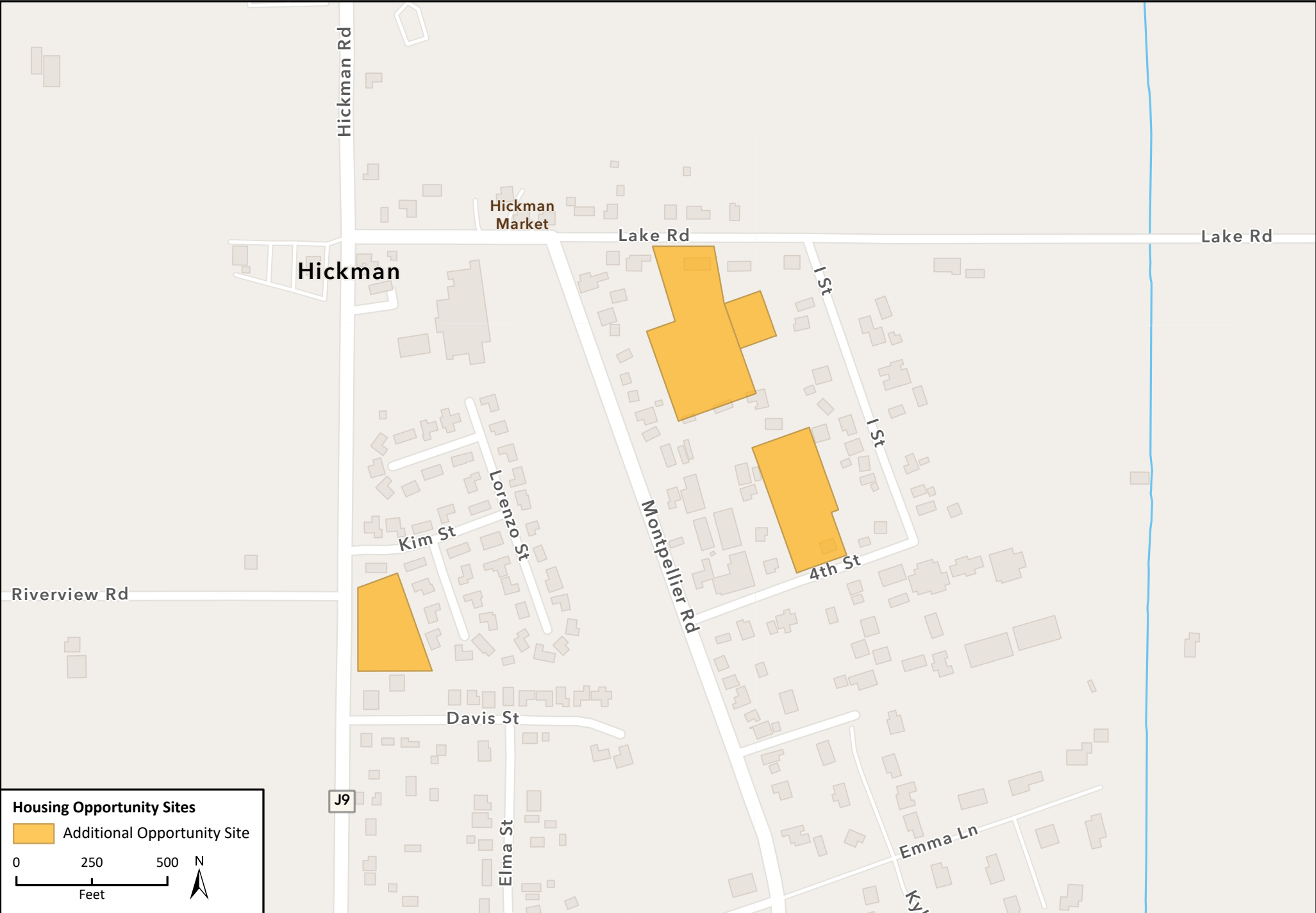
Proposed Housing Sites in Diablo Grande



Basemap provided by Esri and its licensors © 2022.

Stanislaus Outreach Package.aprx
Fig 8 Diablo Grande

Proposed Housing Sites in Hickman



Basemap provided by Esri and its licensors © 2022.

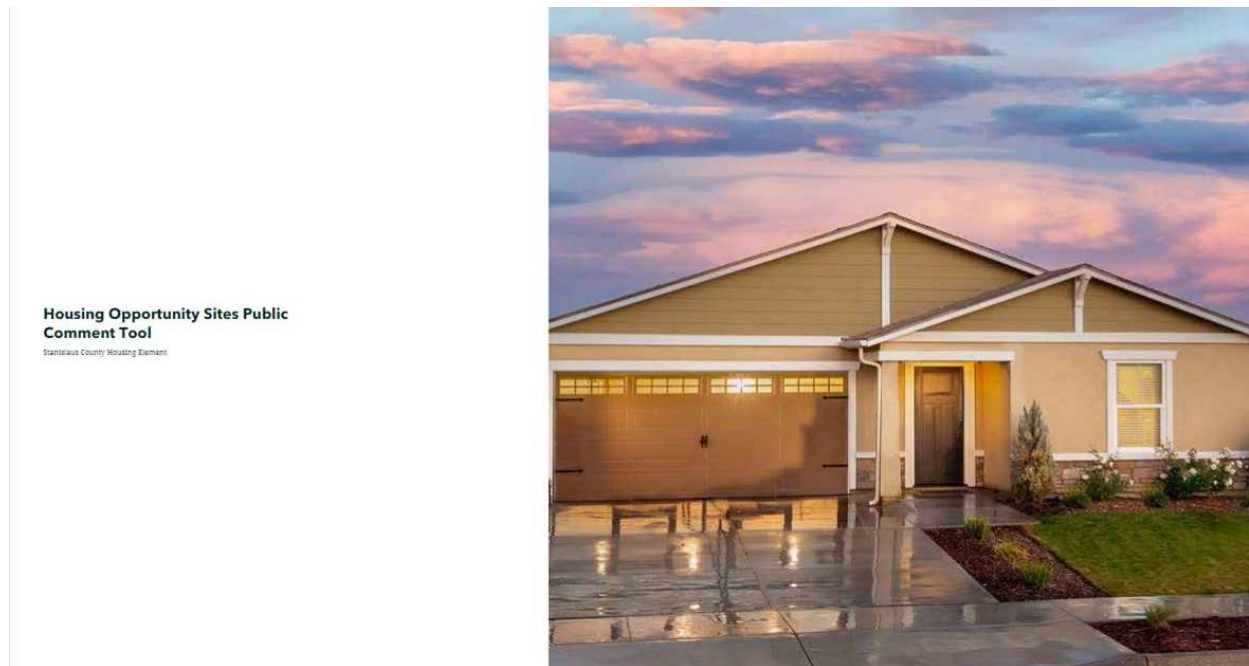
From: Kristin Doud
To: snadibon@stancoah.com; gherry@dlsefinc.com; hjmadziec@vortzon.net; adgi@att.net; thufford@amarok.com; jim@assoceng.com; ben.millerdesign@yahoo.com; rmummett@bmseng.net; bhcommercial@gmail.com; avaldez@bright-homes.com; johnb@biagv.org; ray@homesdirect.com; limbercyandassoc@shoglobal.net; costraich@coldstoragefm.com; swellnitz@commercialarch.com; togrewal@gmail.com; dfengineering@dfengineering.com; dennis@dlsmithdesignstudio.com; edmond@etjarchitect.com; evan.zeff@gmail.com; mav@gdrengr.com; nprichard@kengineers.com; cstark@sungaterealty.com; rhawkins@hawkins-eng.com; surfsupdw@yahoo.com; tom@huffcon.com; john@jbandersenplanning.com; justin@jksdesigninc.com; justin.capp@justinwapp.com; craig@lewiscapadvisors.com; janice.yes@lionakis.com; info@mcreng.com; jmann@mva.net; mike@mseng.comcastbiz.net; edmond@moradengineering.com; bill@morris-eng.com; info@mulinconsulting.com; mike@navarroarc.com; dave@newman-romano.com; PHurban@mseng.net; info@odellengineering.com; nick@pelfonwyle.com; george@petruakis.com; mckelso@peena.com; london.blake@rockfordhabitations.com; dandibrownsodaparkproperties.com; tonest.associates@gmail.com; kgenascl@shafredeng.com; david@skwassociaes.com; sam.david@tall.net; richardloddiponted@gmail.com; Donald.Phillips@stetarae.com; thompson@thompsonarchitecture.com; gabriel@torrerichconstruction.com; Lorrie@torrerichconstruction.com; teschwarz5@yahoo.com; kenyang@lyce-engr.com; rtammer@vvhco.com; mike@wardlaw.com; gmadson@wellyeng.com; arcnorm@pachell.net
Cc: Emily Basnight; Angela Freitas
Subject: Sites Inventory for the Stanislaus County 6th Cycle Housing Element Update
Date: Wednesday, October 12, 2022 5:17:00 PM
Attachments: [Image003.png](#)

Stanislaus County has developed an online mapping tool to give an opportunity to the public to provide input on the proposed sites inventory for Stanislaus County's 6th Cycle Housing Element Update. The tool is available in English or Spanish at the following website: <https://www.stancounty.com/planning/pl/housing-element.shtm>. There is a short tutorial video explaining how to use the mapping tool. The mapping tool will be available for public input until 10/31/2022.

For more information about Stanislaus County's 6th Cycle Housing Element Update please visit <https://www.stancounty.com/planning/pl/housing-element.shtm> or email planning@stancounty.com.

El Condado de Stanislaus ha desarrollado una mapa en línea como herramienta para que el público tenga la oportunidad de ofrecer su opinión sobre el inventario de sitios propuestos para la Actualización del Elemento de Vivienda del 6^{to} Ciclo del Condado de Stanislaus. Esta herramienta está disponible en inglés o español en el siguiente sitio web: <https://www.stancounty.com/planning/pl/housing-element.shtm>. Hay un breve video que explica cómo usar el mapa en línea. Esta herramienta estará disponible para el público hasta el 31 de octubre, 2022.

Para obtener más información acerca de la Actualización del 6^{to} Ciclo del Elemento de Vivienda del Condado de Stanislaus, visite la página web: <https://www.stancounty.com/planning/pl/housing-element.shtm> o por correo electrónico: planning@stancounty.com.



Kristy Doud
Deputy Director
Stanislaus County Planning and Community Development Department

doudk@stancounty.com
(209) 525-6330
1010 10th Street Suite 3400
Modesto, CA 95354



Stanislaus County

6th Cycle Housing Element Update

Community Workshop #1

June 23, 2022 – 6:00 PM

Introductions



Nikki Streegan
Senior Planner



Saara Chaudry
Associate Planner



Jim Harnish, JD
Principal/Owner



Ryan Lester
Associate Planner



Teaming Partners



Presentation Outline

- Housing Element Basics
- Regional Housing Needs Allocation
- Safety Element
- Environmental Justice
- Schedule and Engagement

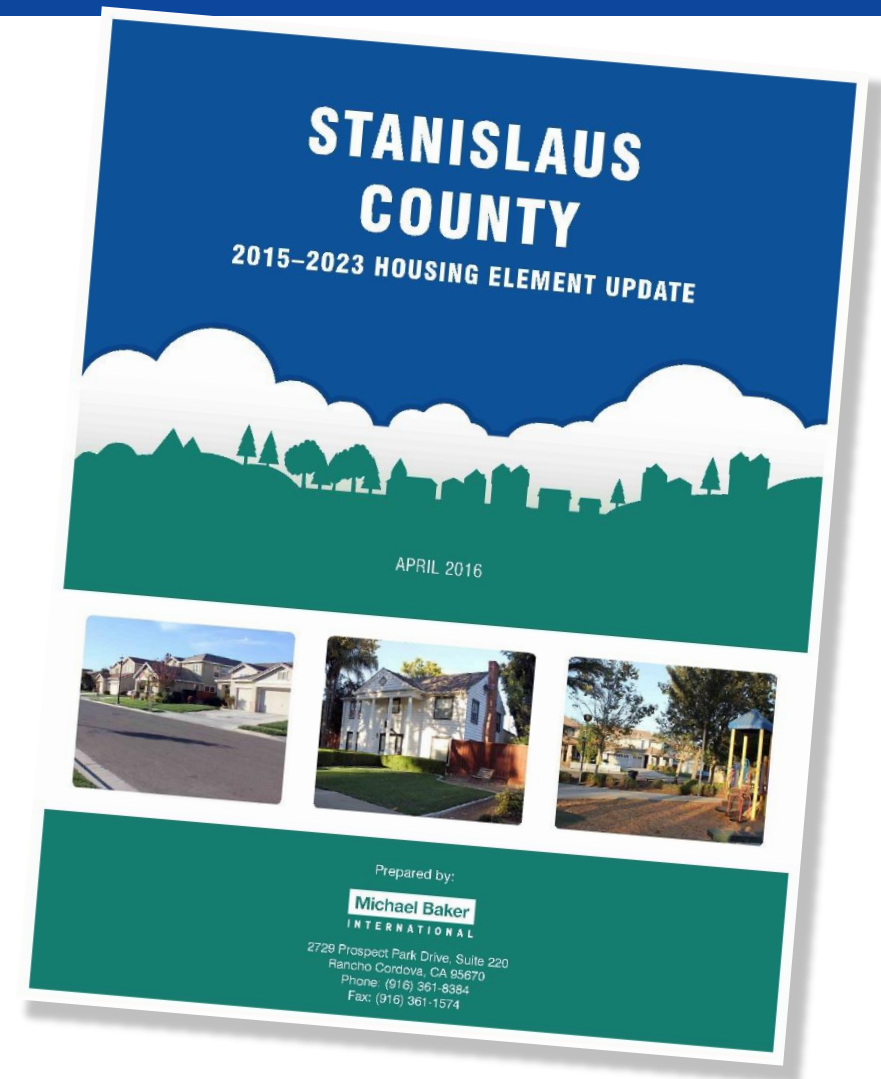




Housing Element Overview

What is a Housing Element?

- One of eight elements in the County General Plan
- Housing Element updates required by State law in eight year “cycles.”
- Currently preparing the 6th cycle Housing Element update
- Updates done on a schedule prescribed by the State (adoption deadline December 31, 2023)

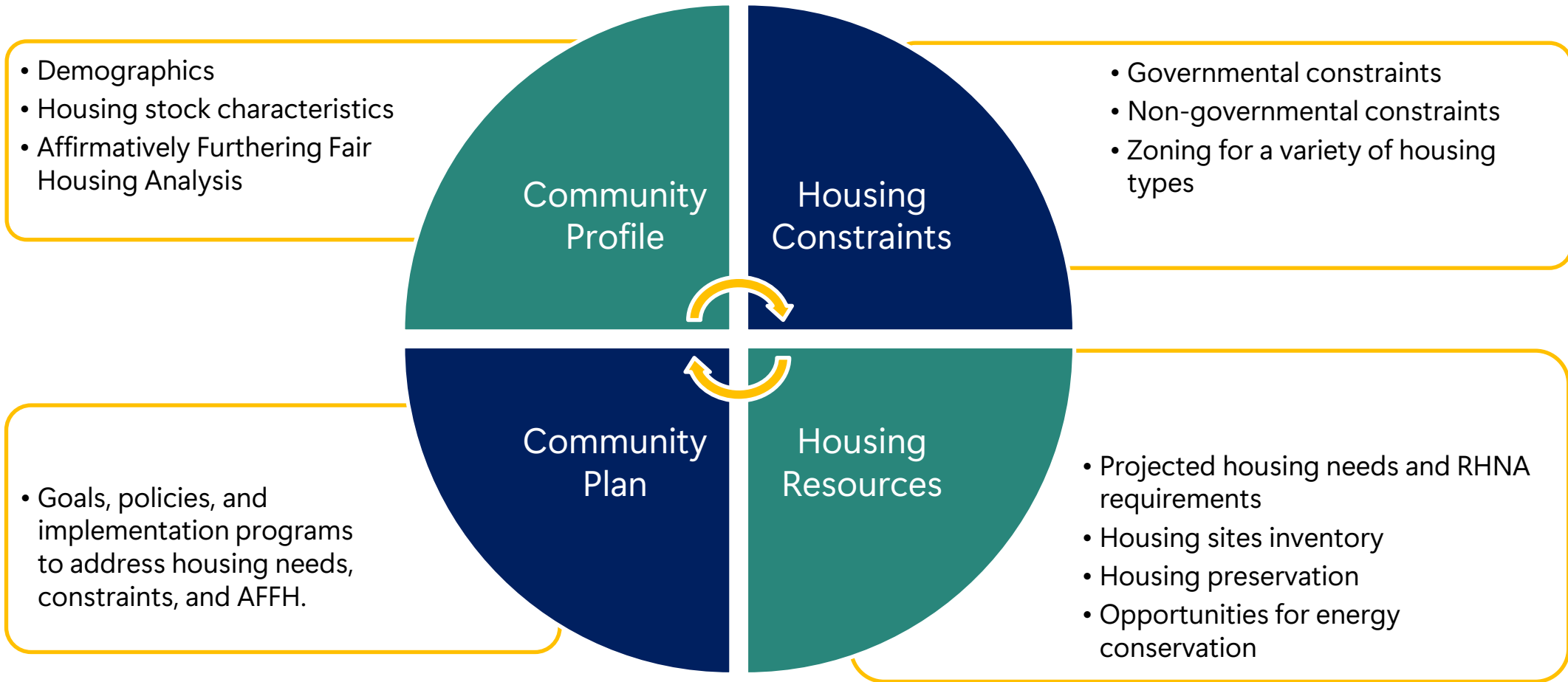


What does a Housing Element do?

- Provides an assessment of both current and future housing needs
- Identifies opportunities and constraints on housing production
- Establishes goals, policies, and programs to meet housing needs
- Updates County practices and regulations to reflect new State laws



Housing Element Basics



Housing Element Basics

Housing Element identifies strategies and programs that focus on:

- Conserving and improving existing affordable housing
- Maximizing housing opportunities throughout the community
- Assisting in the provision of affordable housing
- Removing governmental and other constraints to housing investment
- Promoting fair and equal housing opportunities






Relevant Legislation

- Affordable Housing Streamlined Approval Process: SB 35 (2017)
- ☀️ Additional Housing Element Sites Analysis Requirements: AB 879 (2017), AB 1397 (2017)
- ☀️ Affirmatively Furthering Fair Housing: AB 686 (2017)
- ☀️ No-Net-Loss Zoning: SB 166 (2017)
- ☀️ Safety Element Update to Address Adaptation and Resiliency: SB 1035 (2018)
- By-Right Transitional and Permanent Supportive Housing: AB 2162 (2018), AB 101 (2019)



Relevant Legislation

-  Accessory Dwelling Units: AB 2299 (2016), SB 1069 (2016), AB 494 (2017), SB 229 (2019), SB 13 (2019), AB 670 (2019), AB 671 (2019)
 - Density Bonus: AB 1763 (2019)
 - Housing Crisis Act of 2019: SB 330 (2019)
 - Surplus Land Act Amendments: AB 1486 (2019), AB 1255 (2019)
 - Housing Impact Fee Data: AB 1483 (2019)
 - Emergency and Transitional Housing Act of 2019: AB 139 (2019)
-  Standardization of Sites Inventory Analysis and Reporting: SB 6 (2019)
-  Evacuation Routes: SB 99 (2019), AB 747 (2019)

What happens if the County doesn't update the Housing Element?

- Out of compliance with State Law
- The General Plan could be deemed inadequate and therefore invalid
- A noncompliant or invalid General Plan creates the potential for the County to be sued when making land use decisions
- The County would be ineligible for several Federal and State housing, community development and infrastructure funding and grant programs

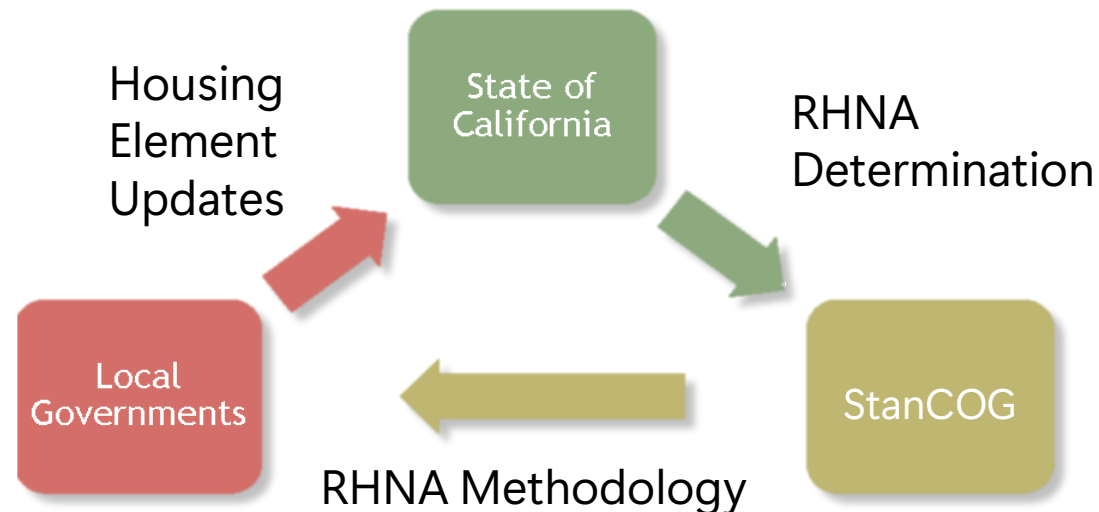




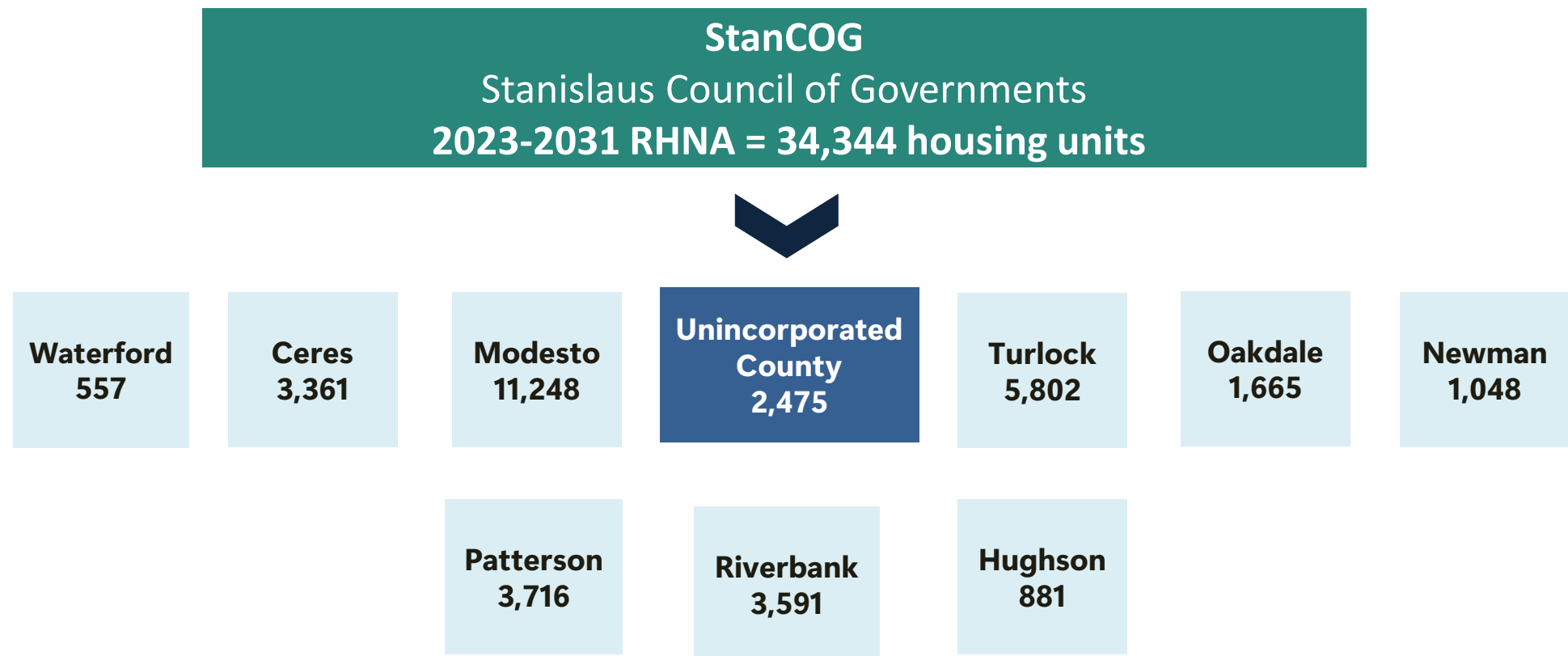
Regional Housing Needs Allocation (RHNA)

What is RHNA?

- The representation of the future housing needs for all income levels in the County for the next eight years
- Prepared by Stanislaus Council of Governments (StanCOG)
- 6th cycle: December 15, 2023 – December 15, 2031



StanCOG RHNA Distribution



Each jurisdiction must accommodate its “fair share” of the regional housing need.



RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low	Low			
574	398	458	1,045	2,475

Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**



RHNA Change Since Last Housing Element Update

Cycle	Lower		Moderate	Above Moderate	Total RHNA
	Very Low	Low			
5 th Cycle	538	345	391	967	2,241
6 th Cycle	574	398	458	1,045	2,475
Change	+36	+53	+67	+78	+234

Cycle	Lower		Moderate	Above Moderate
	Very Low	Low		
5 th Cycle	24.0%	15.4%	17.4%	43.2%
6 th Cycle	23.2%	16.1%	18.5%	42.2%

Source: The Board of Supervisors of the County of Stanislaus Board Action Summary, Resolution No. 2020-0169, Board Agenda Item 6.D.1 (April 21, 2020), StanCOG Proposed RHNA Methodology Framework, Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.



Stanislaus County Housing Need Requirement

RHNA for Unincorporated Stanislaus County by Income Category, 2023-2031 and Ability to Pay for Housing Based on HCD Income Limits, Stanislaus County, 2022

Income Category	RHNA (Housing Units)	Estimated Income (Four Person Household)	Maximum Affordable Monthly Rent
Extremely Low Income (<30% of Median Income)	287	< \$18,850	\$471
Very Low Income (30-50% of Median Income)	287	\$31,450	\$786
Low Income (50-80% of Median Income)	398	\$50,300	\$1,258
Moderate Income (80-120% of Median Income)	458	\$62,850	\$1,571
Above Moderate Income (>120% of Median Income)	1,045	> \$74,450	\$2,201
TOTAL	2,475	--	--

Source: StanCOG Option 1B RHNA, Figure 17; 2020 American Community Survey, and Mintier Harnish, 2022.





Housing Element Discussion

Questions

- What members of the community are most in need of housing and services?
- What are the unmet housing needs in Stanislaus County?
- What are the barriers to affordable housing in Stanislaus County?
- What can the County and community leaders do to address these needs and barriers?



General Project Schedule



Milestones	Estimated Date
Workshop #1: Housing, Safety, and EJ	June 23, 2023
Planning Commission Study Session	July 2022
Workshops #2 and #3	Summer/Fall 2022
Public Review Draft Housing Element	January 2023
HCD Review of Draft Housing Element	April-June 2023
Planning Commission Hearings	Oct/Nov 2023
Board of Supervisors Hearings	Nov/Dec 2023
Submit to HCD for Certification	December 2023



Community Engagement Events

- Three Community Workshops
- Two Study Sessions
 - Planning Commission (1)
 - General Plan Update Committee (1)
- Four Public Hearings
 - Planning Commission (2)
 - Board of Supervisors (2)



Community Workshops

Workshop 1

- Housing Element Overview
- Project Overview & Discussion

Today!

Workshop 2

- Sites Inventory Analysis
- Feedback on Environmental Justice & Safety Elements

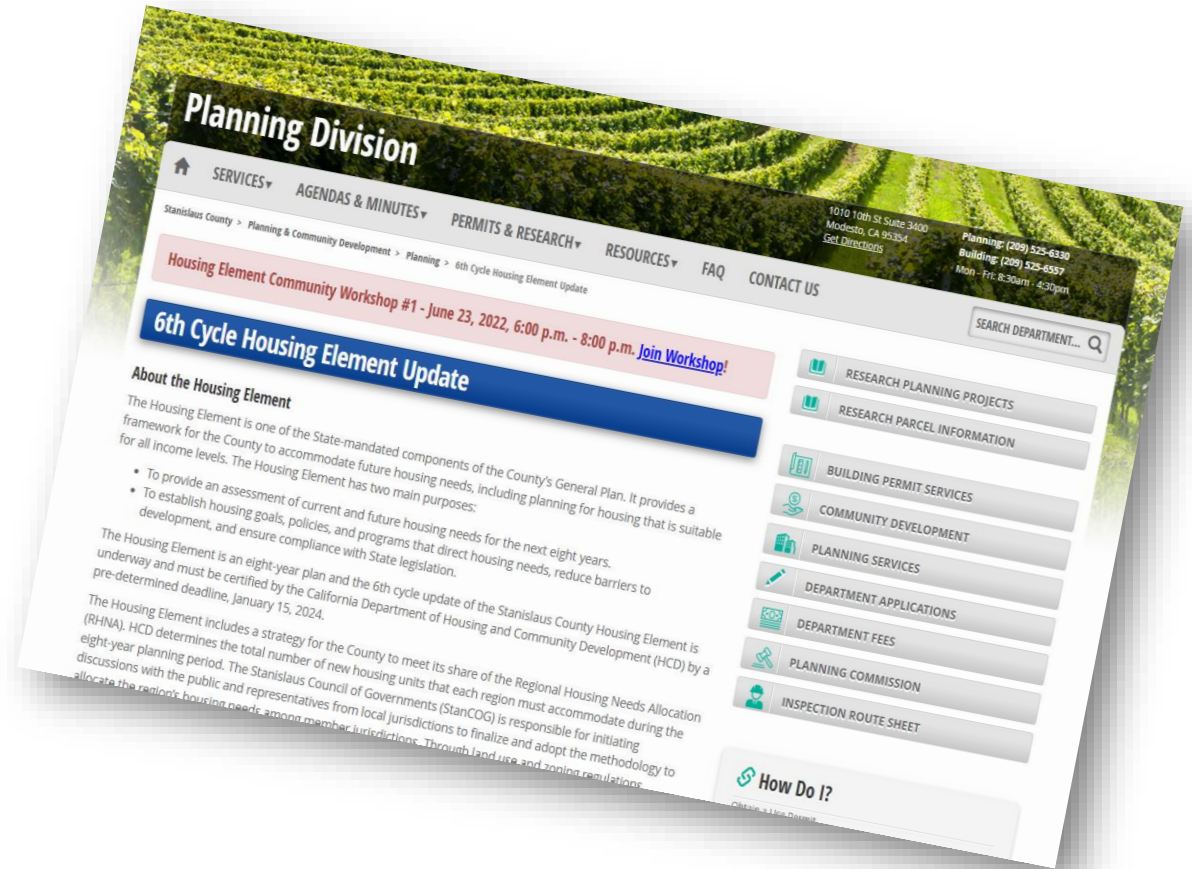
Workshop 3

- 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

Community Workshop #1 Highlights

Housing and Safety:

- Needs include housing for **homeless/transitional, affordable for seniors, foster youth**, in proximity to **transit and resources**.
- Emphasis on **infill opportunities** rather than outward growth.
- Safety Element should **involve OES** among stakeholders.
- Natural disasters and **climate change** have a greater impact on **low-income households**.
- More **green infrastructure** is needed.



Community Workshop #1 Highlights

Environmental Justice:

- **Pollution concerns:** smog from vehicles, air quality, water quality.
- **Facilities:** parks are accessible, but no restrooms. The unincorporated *islands* lack resources.
- **Healthy food access:** other modes of transportation to grocery stores are needed, most travel to stores by car.
- **Physical activity:** need bike and walking paths, dedicated bike lanes.





Sites Inventory

Sites Inventory

6th Cycle Criteria:

- Sites likely to redevelop or develop in next 8 years:
 - Vacant
 - Owner/developer interest
 - Low improvement to land value ratio
 - Low FAR if non-vacant
- Standards for lower income sites:
 - 0.5 and 10 acres in size
 - Allow at least 20 dwelling units/acre
 - Large enough to accommodate at least 16 units
 - Infrastructure-ready
 - Access to jobs, transit, and services



Sites Inventory

Units Needed:

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	574	398	458	1,045	2,475
Planned and Approved Units	0	0	0	299	299
ADUs	0	0	0	96	96
Remaining RHNA After Credits	574	398	458	650	2,080
5th Cycle Units*	43	29	99	308	479
Vacant & Nonvacant Units*	214	148	268	975	1,605
Potential Rezone*					0
Total Units in Inventory	257	177	367	1,283	2,084
Total Unit Surplus (Shortfall)	(317)	(221)	(91)	633	4



Maximum Residential Densities

Zone District	Max Residential Density
Residential	
R-A	1 du/3 acres*
R-1	8 du/acre**
R-2	14 du/acre**
R-3	25 du/acre**
Commercial	
C-1	25 du/acre**
Agriculture	
A-2	2 du/20 acres

*If the General Plan land use is Estate Residential, the minimum lot size is 3 acres. Otherwise, minimum lot size is 8,000SF.

**Maximums are subject to underlying General Plan land use and if parcel is connected to sewer and water.

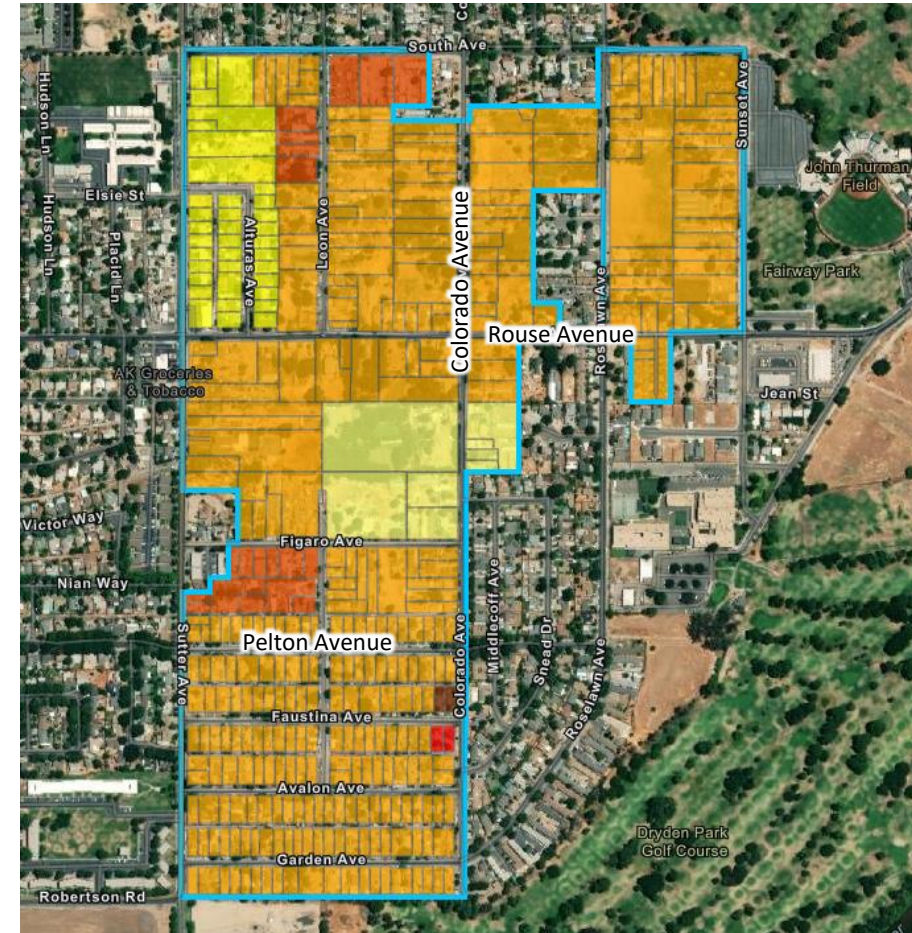


Approaches to Meet Lower Income RHNA

Example 1: Rezone Specific Residential Parcels

- R-2 to R-3
- R-1 to R-3

Example Area: Rouse/Colorado



Approaches to Meet Lower Income RHNA

Example 2: Rezone Specific Commercial Parcels

- Vacant/underutilized
- 0.5 - 10 acres
- Must meet minimum 20 du/acre
- C-1, R-3, or new district

Example Area: Commercial Corridor

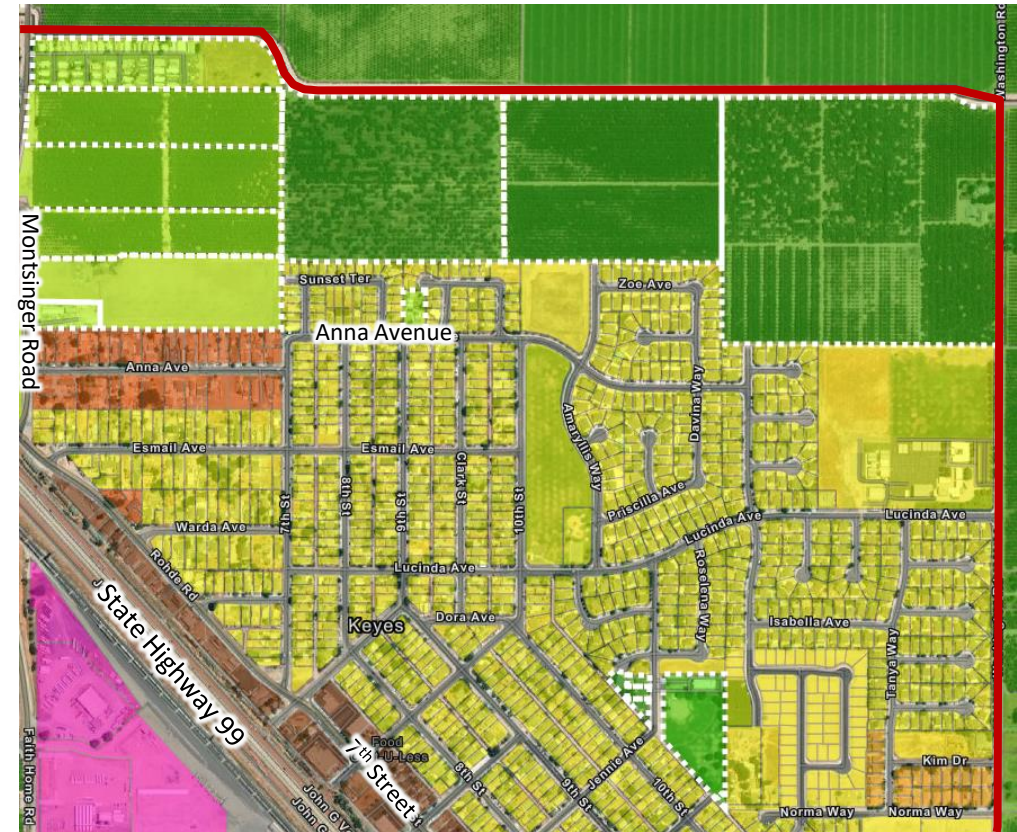


Approaches to Meet Lower Income RHNA

Example 3: *Rezone Measure E exempt parcels*

- A-2 to C-1 or R-3
- For parcels over 10 acres, a development agreement, specific plan, or inclusionary requirement may be needed (to meet lower income RHNA)

Example area: North 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



Additional Slides

What happens if the County doesn't update the Housing Element?

- Out of compliance with State Law
- The General Plan could be deemed inadequate and therefore invalid
- A noncompliant or invalid General Plan creates the potential for the County to be sued when making land use decisions
- The County would be ineligible for several Federal and State housing, community development and infrastructure funding and grant programs



RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low	Low			
574	398	458	1,045	2,475

Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**





Housing Element Discussion

Questions

- What members of the community are most in need of housing and services?
- What are the unmet housing needs in Stanislaus County?
- What are the barriers to affordable housing in Stanislaus County?
- What can the County and community leaders do to address these needs and barriers?



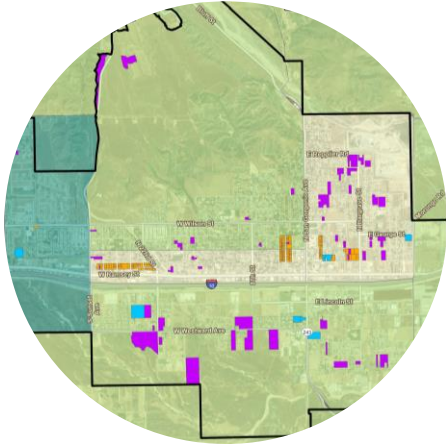


Stanislaus County

6th Cycle Housing Element Update

General Plan Update Committee Presentation
September 1, 2022 – 3:00 PM

What is a sites inventory?



The housing element of the general plan must include an inventory of land suitable and available for residential development to meet the locality's regional housing need by income level. (CA Gov. Code Sec. 65583.2)

6th Cycle Criteria

- Sites likely to redevelop/develop in next 8 years:
 - Vacant
 - Owner/developer interest
 - Low improvement to land value ratio
 - Low FAR if non-vacant
- Standards for lower income sites:
 - 0.5 and 10 acres in size
 - Allow at least 20 dwelling units/acre
 - Large enough to accommodate at least 16 units
 - Infrastructure-ready
 - Access to jobs, transit, and services



Sites Inventory Summary Table

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	574	398	458	1,045	2,475
Planned and Approved Units	0	0	0	317	317
ADUs	0	0	0	96	96
Remaining RHNA After Credits	574	398	458	632	2,062
4th and 5th Cycle Units*	23	15	91	219	348
Vacant & Nonvacant Units*	90	62	264	673	1,089
Potential Rezone*	698	484	215	0	1,397
Total Units After Credits	811	561	570	892	2,834
Total Unit Surplus	237	163	112	260	772
Total % Buffer above RHNA Allocation	41%	41%	24%		

*Lower income units distributed proportionally between very low and low-income based on RHNA allocation

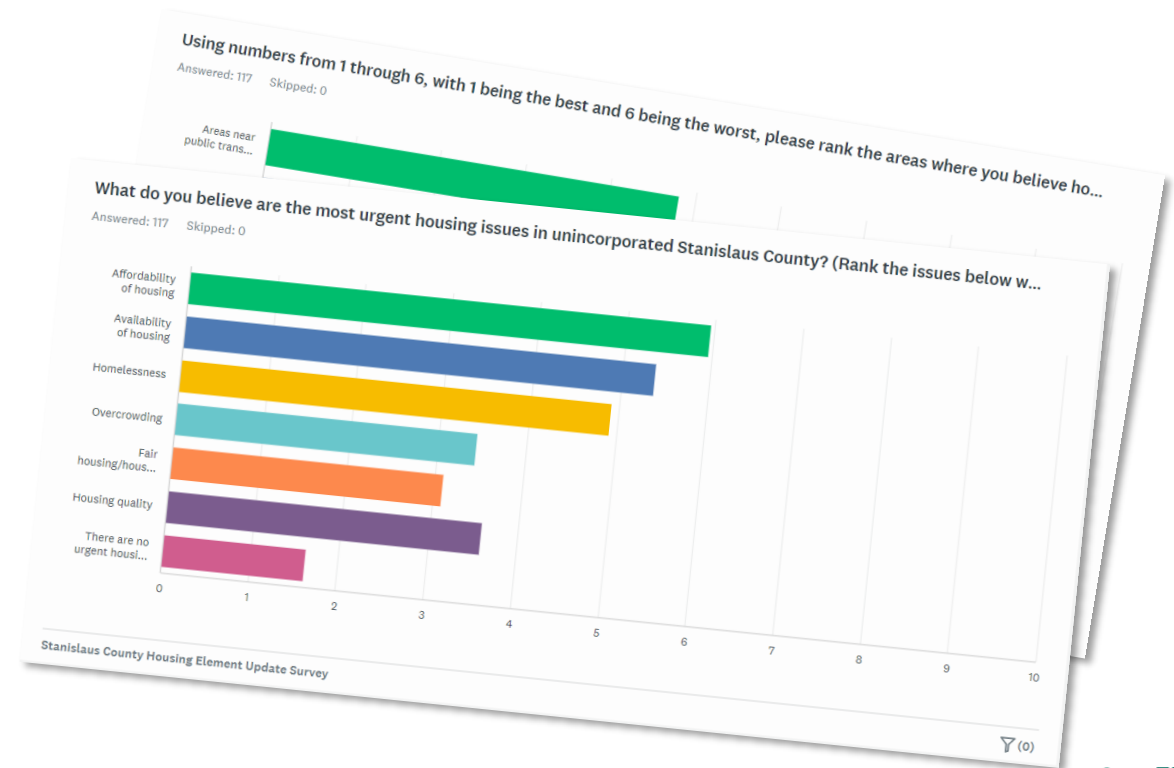


Preliminary Housing Survey Results

"Please rank (1-6) the areas where you believe housing should be developed in unincorporated Stanislaus County."

Top five responses:

1. Areas near public transit, employment, and shopping centers
2. Land that could be converted from commercial to residential or mixed-use
3. Vacant land on the edges of cities and unincorporated communities
4. Areas where there is existing housing
5. Agricultural land on the edges of cities and unincorporated communities



Implications from Rezone

Develop rezone program to:

- Permit owner-occupied and rental multifamily uses by right for developments in which 20% or more of the units are affordable to lower income households;
- Permit the development of at least 16 units per site;
- Rezone the identified parcels within 3 years and 120 days of the start of the Housing Element Cycle (April 2027).



Approaches to Meet Lower Income RHNA

- Rezone specific residential parcels
 - R-1 to R-3
 - R-2 to R-3
- Rezone specific commercial parcels
 - C-2 to C-1
 - C-2 to R-3
- Rezone Measure E parcels
 - Not needed to meet RHNA



Planning Sub-Areas Proposed for Rezone

- Bret Harte
- Denair
- Empire
- Grayson
- Keyes
- North Ceres
- Salida
- West Modesto



Additional Topics & Next Steps

- Environmental Justice Advisory Group
- Community Workshop #2 – Weds., Sept. 28th





Additional Slides

RHNA Breakdown

Lower		Moderate	Above Moderate	Total RHNA
Very Low	Low			
574	398	458	1,045	2,475

Unincorporated Stanislaus County

39% of the RHNA is for sites that can accommodate **lower-income housing**



Sites Inventory

Units Needed:

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	574	398	458	1,045	2,475
Planned and Approved Units	0	0	0	299	299
ADUs	0	0	0	96	96
Remaining RHNA After Credits	574	398	458	650	2,080
5th Cycle Units*	43	29	99	308	479
Vacant & Nonvacant Units*	214	148	268	975	1,605
Potential Rezone*					0
Total Units in Inventory	257	177	367	1,283	2,084
Total Unit Surplus (Shortfall)	(317)	(221)	(91)	633	4



Maximum Residential Densities

Zone District	Max Residential Density
Residential	
R-A	1 du/3 acres*
R-1	8 du/acre**
R-2	14 du/acre**
R-3	25 du/acre**
Commercial	
C-1	25 du/acre**
Agriculture	
A-2	2 du/20 acres

*If the General Plan land use is Estate Residential, the minimum lot size is 3 acres. Otherwise, minimum lot size is 8,000SF.

**Maximums are subject to underlying General Plan land use and if parcel is connected to sewer and water.

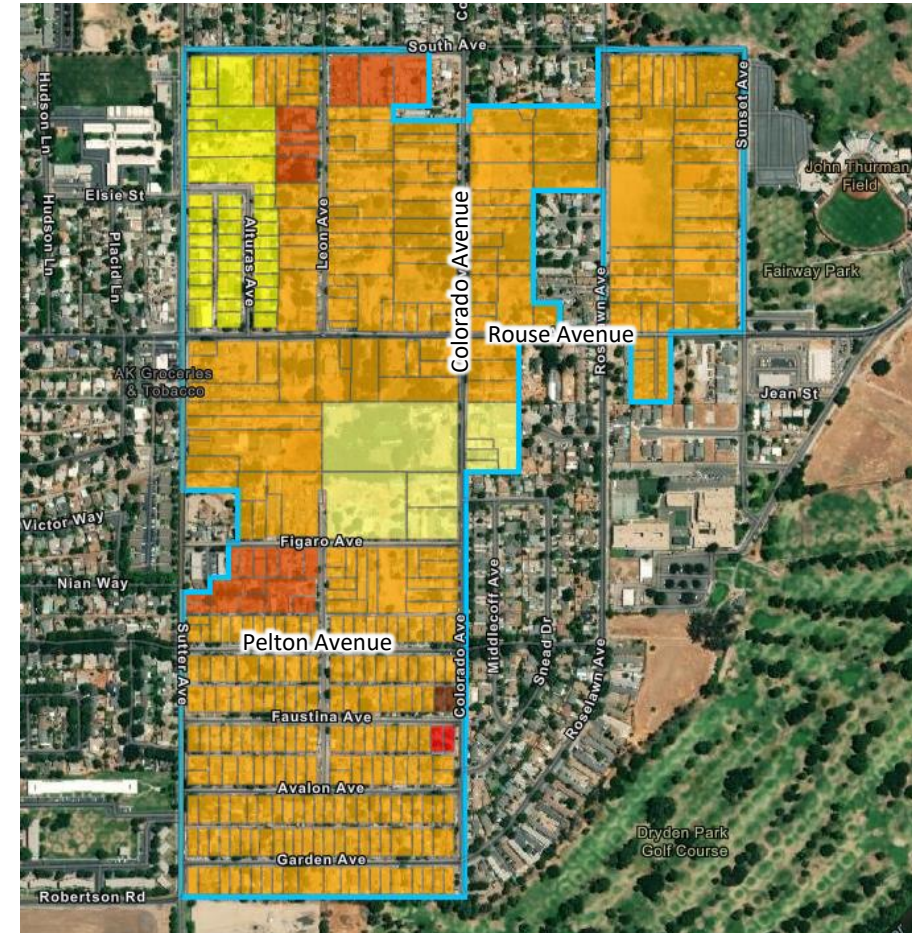


Approaches to Meet Lower Income RHNA

Example 1: Rezone Specific Residential Parcels

- R-2 to R-3
- R-1 to R-3

Example Area: Rouse/Colorado

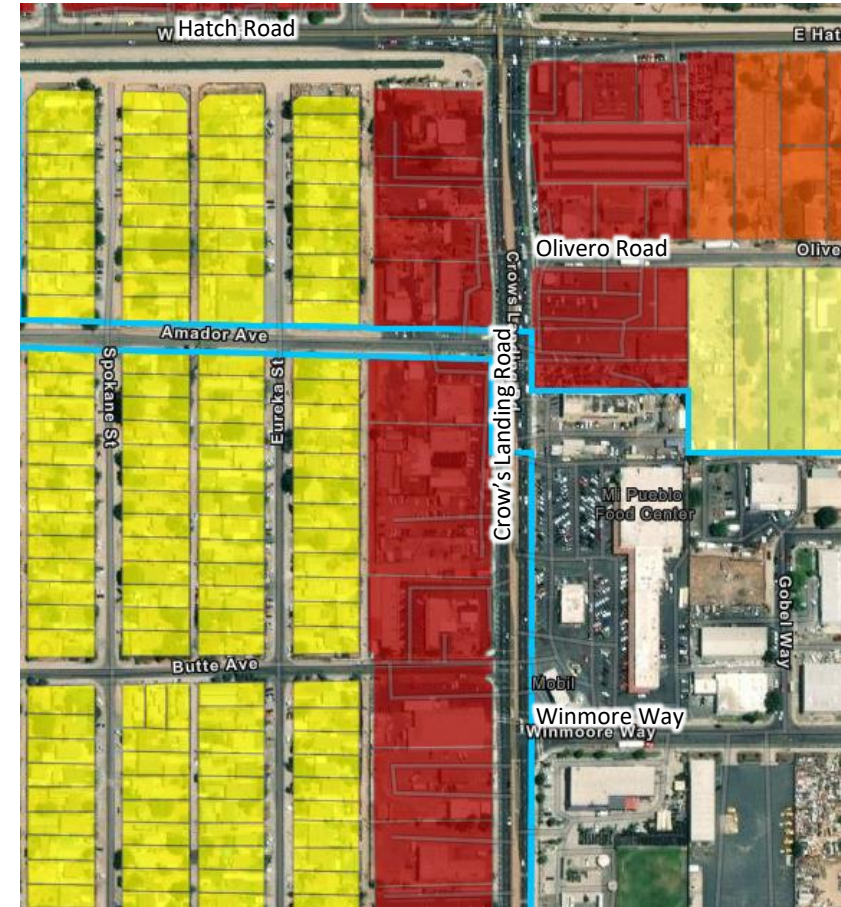


Approaches to Meet Lower Income RHNA

Example 2: Rezone Specific Commercial Parcels currently zoned C-2

- Vacant/underutilized
- 0.5 - 10 acres
- Must meet minimum 20 du/acre
- C-1, R-3, or new district

Example Area: Commercial Corridor

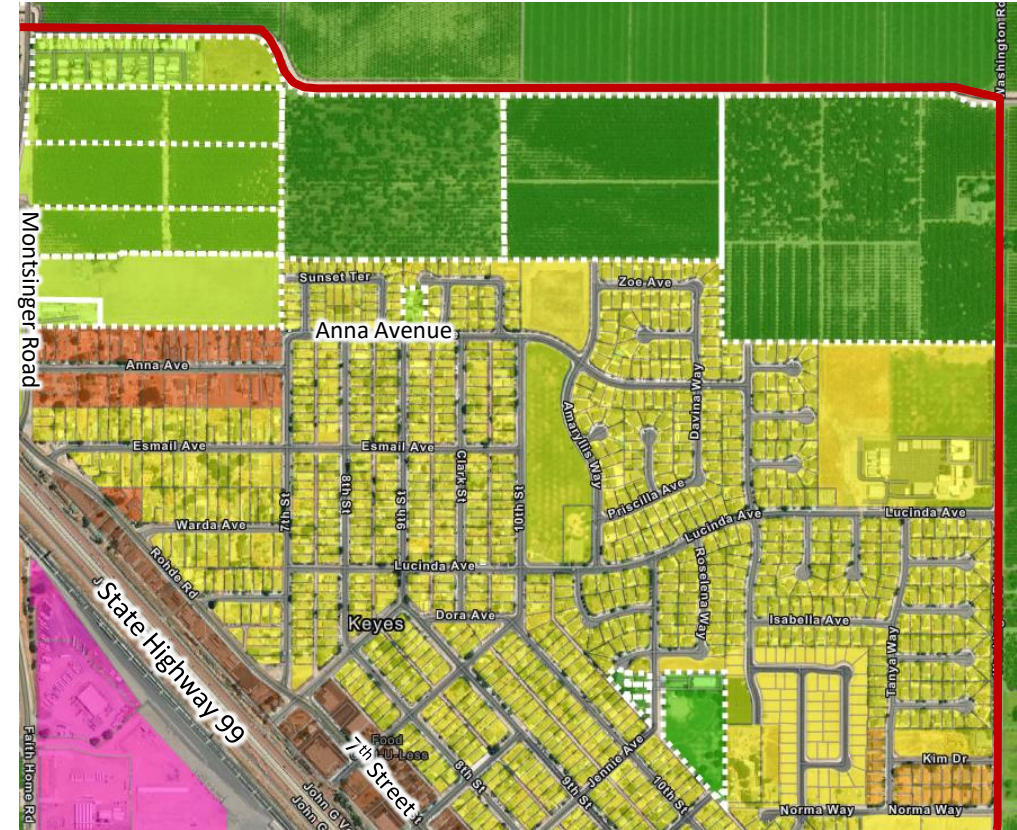


Approaches to Meet Lower Income RHNA

Example 3: *Rezone Measure E exempt parcels*

- A-2 to C-1 or R-3
- For parcels over 10 acres, a development agreement, specific plan, or inclusionary requirement may be needed (to meet lower income RHNA)

Example area: North Keyes





Stanislaus County 2023-2031 Housing Element Update

Community Workshop #1

June 23, 2022, 6:00-8:00pm

(<https://us06web.zoom.us/j/86984953284>)

Join us for a virtual community workshop to discuss the Housing Element Update for unincorporated Stanislaus County and related updates.

Housing Element

The Housing Element is one of the State-mandated components of the County's General Plan. It provides a framework for the County to accommodate future housing needs, including planning for housing that is suitable for all income levels. The Housing Element has two main purposes:

- To provide an assessment of current and future housing needs for the next eight years.
- To establish housing goals, policies, and programs that direct housing needs, reduce barriers to development, and ensure compliance with State legislation.

Safety Element

State law requires jurisdictions to update the Safety Element upon revision of the Housing Element. The goal of the Safety Element is to reduce the potential short and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards.

Environmental Justice

In September 2016, Senate Bill 1000 was adopted to require jurisdictions with "disadvantaged communities" to incorporate environmental justice policies into their general plans. Disadvantaged communities are neighborhoods with low-income households that are exposed to pollution (e.g., freeways, landfills). State law requires environmental justice policies to be incorporated into the general plan upon the adoption of two or more general elements, which is required in the case of Stanislaus County.

Questions?

Contact:

planning@stancounty.com

Stay up to date! stancounty.com/housingelement

Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.



Actualización del Elemento de Vivienda del Condado de Stanislaus 2023-2031

Taller comunitario #1

23 de junio de 2022, 6:00-8:00 p.m.
(<https://us06web.zoom.us/j/86984953284>)

Únase a nosotros en un taller comunitario para discutir la Actualización del Elemento de Vivienda y actualizaciones relacionadas.

Elemento de Vivienda

El Elemento de Vivienda es uno de los componentes obligatorios del Estado del Plan General del Condado. Proporciona un marco para que el Condado se adapte a las necesidades futuras de vivienda, incluida la planificación de viviendas adecuadas para todos los niveles de ingresos. El Elemento de Vivienda tiene dos propósitos principales:

- Evaluar las necesidades de vivienda actuales y futuras para los próximos ocho años.
- Establecer metas, políticas y programas de vivienda que orienten las necesidades de vivienda, reduzcan las barreras al desarrollo y aseguren el cumplimiento de la legislación estatal.

Elemento de seguridad

La ley estatal exige que las jurisdicciones actualicen el Elemento de seguridad tras la revisión del Elemento de vivienda. El objetivo del Elemento de seguridad es reducir el riesgo potencial a corto y largo plazo de fallecimientos, lesiones, daños a la propiedad y dislocación económica y social como resultado de incendios, inundaciones, sequías, terremotos, deslizamientos de tierra, cambio climático y otros peligros.

Justicia ambiental

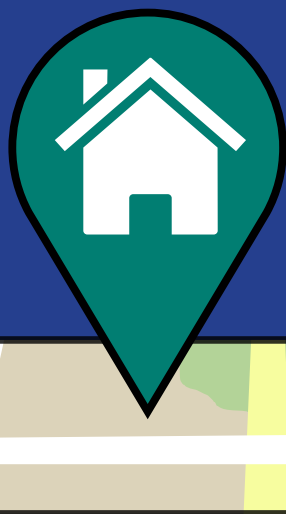
En septiembre de 2016, se adoptó el Proyecto de Ley 1000 del Senado para exigir que las jurisdicciones con "comunidades desfavorecidas" incorporen políticas de justicia ambiental en sus planes generales. Las comunidades desfavorecidas son los barrios con hogares de ingresos bajos que están expuestos a la contaminación (p. ej., autopistas, vertederos). La ley estatal requiere que las políticas de justicia ambiental se incorporen al plan general luego de la adopción de dos o más elementos generales, lo cual se requiere en el caso del condado de Stanislaus.

¿Tiene alguna pregunta?
Contacto:
planning@stancounty.com

¡Manténgase al día! stancounty.com/housingelement

Visite el sitio web del proyecto para registrarse en nuestra lista de correo electrónico. Vuelva a consultar periódicamente los anuncios de las reuniones, los materiales de los talleres y los documentos públicos para su revisión a lo largo del proyecto.

Upcoming Community Workshop



Where should housing be built?

You can help answer this question and guide the future of housing in unincorporated Stanislaus County!

Community Workshop

**Tuesday, October 11, 2022
6:00 - 7:30 pm**

**Ceres Community Center
2701 4th Street
Ceres, CA 95307**

Questions?

**Contact:
planning@stancounty.com
209-525-6330**

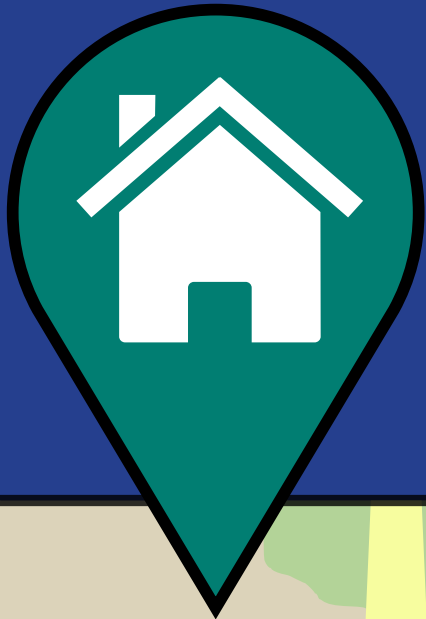
Stanislaus County is holding a community workshop to discuss the Housing Element Update, as well as the Safety and Environmental Justice Elements. The focus of the workshop is seek input on sites appropriate for the development of housing and to present information and initial findings related to the safety and environmental justice topics in the County. See you there!

Stay up to date! stancounty.com/housingelement

Visit the project website to sign up for our email list. Check back regularly for meeting announcements, workshop materials, and public documents for review throughout the project.

STANISLAUS COUNTY | 2023-2031 HOUSING ELEMENT UPDATE

Upcoming Community Workshop



Where should housing be built?

You can help answer this question and guide the future of housing in unincorporated Stanislaus County!

Questions?

Contact:

**planning@stancounty.com
209-525-6330**

Community Workshop

Tuesday, October 11, 2022

6:00 - 7:30 pm

Ceres Community Center

2701 4th Street

Ceres, CA 95307

Visit: stancounty.com/housingelement

This page intentionally left blank.

Attachment 4

Public Comments

Commenter	Topic	Comment
California Rural Legal Assistance, Inc.	Outreach	<p>The minimal and eleventh-hour outreach efforts on the part of the County do not represent a “diligent effort” to reach out to affected communities, and the County should take immediate steps to extend the public comment period and create a plan for obtaining meaningful feedback from the communities and population segments most affected by the proposed Housing Element update. In every Housing Element update, a jurisdiction is required to make and then describe its “diligent effort. . . to achieve public participation of all economic segments of the community in the development of the housing element.” A diligent effort means “going beyond simply giving the public an opportunity to provide input and should be proactively and broadly conducted through a variety of methods to assure access and participation.”</p> <p>As part of their obligation to affirmatively further fair housing, jurisdictions must also include a summary of their fair housing outreach capacity. This summary must describe the jurisdiction’s process for</p>
California Rural Legal Assistance, Inc.	Outreach	<p>Nearly every aspect of the County’s method of soliciting and obtaining public participation relied on technological literacy, isolating significant segments of Stanislaus County’s population included protected categories, such as people with disabilities, low income Latino communities, and people lacking technological infrastructure such people living in disadvantaged unincorporated communities. Many population segments with specific housing needs that must be addressed by the Housing Element suffer disproportionately from inadequate technological access or technological literacy. For groups such as</p>
California Rural Legal Assistance, Inc.	Outreach	<p>The first step to conducting diligent outreach is to inform the community of upcoming events via methods of communication the community uses and trusts. Using a mixture of media types is a well-known method for circulating information across diverse segments of the population. The County’s only methods of general public noticing for all Housing Element related events and publications, however, were flyers posted on the county’s website and social media accounts and circulated via email to the County’s email subscriber lists.⁸ For residents who do not engage with county processes on a regular basis, these are not accessible, obvious, or even plausible sources of information. The incredibly poor attendance to both workshops (discussed below) can likely be attributed to these incredibly narrow-</p>

California Rural Legal Assistance, Inc.	Outreach	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
California Rural Legal Assistance, Inc.	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
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
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

California Rural Legal Assistance, Inc.	AFFH	<p>The Housing Element must include a Fair Housing Assessment.¹⁴ Among other components, the Fair Housing Assessment (FHA) must include a “summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and fair housing outreach capacity.” HCD’s AFFH Guidelines explain that this requirement is intended to demonstrate a jurisdiction’s ability to disseminate information related to fair housing and provide outreach and education to assure community members are aware of their fair housing rights.¹⁵ The summary should include:</p> <ol style="list-style-type: none"> 1) A listing of local, regional, and state agencies and organizations active in the locality 2) A description of primary activities and capacity for each entity, including actions taken by the locality, such as provision of dedicated resources 3) Evaluation of impacts on protected characteristics and demographic trends 4) Any additional relevant information about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region affecting groups with other protected characteristics.” The Draft Element
California Rural Legal Assistance, Inc.	AFFH	<p>In assessing Fair Housing patterns and trends in Stanislaus County, local knowledge and data is critical to an understanding of current housing needs and to an evaluation of potential effectiveness of proposed actions to impact segregation. In addition to the summary of fair housing issues and assessment of fair housing enforcement and outreach capacity, the Fair Housing Assessment must include an “analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.” The analysis has to not only identify, but also “examine” the patterns, trends, areas, disparities, and needs both within the jurisdiction and in regional context, based on race and other protected characteristics. In its version of the Fair Housing Assessment,²² the Draft Housing Element presents maps and data from various sources</p>

California Rural Legal Assistance, Inc.	AFFH	<p>The Draft HE does not provide an internally consistent and accurate assessment of patterns and trends of integration and segregation of Stanislaus County's diverse communities and citizens. HCD's AFFH Guidelines specify several requirements for the FHA assessment of Integration and Segregation Patterns and Trends. The analysis must include patterns and trends related to people with protected characteristics, and must address integration and segregation to "holistically evaluate" patterns and practices and better identify and prioritize contributing factors. A strong analysis would address segregation and integration of households with lower incomes specifically, and at minimum, the analysis must touch upon segregation and integration in terms of race and ethnicity, income, familial status, and disability status. Finally, the analysis must identify which groups experience the highest level of segregation. Draft Housing Element Sections 3.6 through 3.8 attempt to address segregation and integration patterns in the aforementioned set of characteristics. Section 3.6, analyzing Race and Ethnicity segregation, claims both that "there are few areas of concentrated population by race/ethnicity in Stanislaus County" and that "the distribution of white and Hispanic majority census tracts is nearly split</p>
California Rural Legal Assistance, Inc.	AFFH	<p>With respect to racially and ethnically concentrated areas of poverty, HCD guidelines specify that the analysis "should evaluate the patterns and changes over time and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends." Section 3.9 of the Draft Housing Element identifies five Racially and Ethnically concentrated Areas of Poverty in Stanislaus County: Airport, Rouse, Bret Harte, Empire, and Bystrom.³⁰ There is no analysis of any pattern or change over time in these areas, nor of any past policies, practices, investments, and demographic trends that have resulted in these R/ECAP areas. Omitted from the narrative analysis (which is a paragraph in total) are a myriad of crucial facts. First, all five of these R/ECAPs are in the unincorporated pocket and island areas surrounding the southern boundary of Modesto. Airport, Bystrom, and Bret Harte are all in South Modesto/North Ceres, while Rouse is located in West Modesto and Empire is a community at Modesto's far southeastern extreme off Yosemite Boulevard. With the exception of Empire due to its remoteness, every single one of the R/ECAPs exists in an unincorporated pocket surrounded by better-resourced communities that have been annexed into the cities of Modesto and/or Ceres, leading to the strange shape of Modesto's western and southern borders. All five of the R/ECAPs are areas well known to be in dire need of infrastructure development ranging from sidewalks, storm drains, and streetlights to even basic sewer connections in some places. All five of them have been passed over for decades for investments in infrastructure, housing, and transportation. Bret Harte and Rouse are both, to this day,</p>

California Rural Legal Assistance, Inc. AFFH	<p>The Fair Housing Assessment must also address disparities in opportunity. HCD guidelines require that the analysis “individually address access to opportunity for education, transportation, economic development, and environment” in addition to evaluating total access to opportunity.³¹ The guidelines go on to state: “Patterns over time should be discussed as well as policies, practices, and investments that affect access to opportunity. Local data and knowledge and other relevant factors must be considered, including incorporating public outreach and targeted community engagement.” Section 3.11.1 of the Draft Housing Element identifies areas with the highest resources. The list includes the eastern communities of East Oakdale, Orange Blossom, Knights Ferry, and Hickman.³³ This section also identifies Airport and Bystrom as areas of high segregation and poverty. The only conclusion drawn from these basic map readings is that “access to opportunity varies widely throughout the county.”³⁴ As</p>
California Rural Legal Assistance, Inc. AFFH	<p>Assessment of disproportionate housing needs and especially risk of displacement must be based on local information and must provide a realistic assessment of these risks. On analyzing disproportionate housing needs, including displacement, HCD guidelines note that “particularly important to this analysis is local data and knowledge, since some areas could be impacted by market conditions that put households at risk of displacement, or pending or upcoming planning decisions may exacerbate displacement risk.”³⁵ Disproportionate needs that should be analyzed include overcrowding, overpayment, substandard housing conditions, and displacement. Section 3.12 of the Draft Housing Element and its subsections addresses disproportionate housing needs. This section finds that Rouse, Bystrom, and Bret Harte are the</p>

<p>California Rural Legal Assistance, Inc. AFFH</p>	<p>Careful analysis of disproportionate housing needs is particularly important in assessing possible risks of displacement, and the Draft HE does not provide adequate analysis in this arena. In addition to the general guidelines for analyzing Disproportionate Housing Needs, HCD has special rules and indicates a need for special attention to be paid to Displacement. HCD's AFFH Guidelines highlight three key mechanisms of neighborhood change that must be analyzed to understand displacement as an issue: movement of people; public policies and investments such as capital improvements and transit stops; and flow of private capital.³⁶ One key concern is the possibility for investment driven displacement, which often disproportionately impacts people of color, lower income households, persons with disabilities, large households, and persons at-risk for or experiencing homelessness. The HCD explains that in a process that often follows decades of disinvestment, investment driven displacement can take place as a neighborhood undergoes a process of gentrification. This gentrification can arrive in the form of a flood of public and/or private sector investment which leads to real estate speculation, improvements in transit access, and changes in land use. These investments attract residents with higher incomes and higher educational attainments, displacing historic residents who cannot afford to remain and excluding them from any benefits of the sudden changes to their communities. In order to understand the risk of investment driven and other types of displacement, HCD suggests that the FHA must consider public infrastructure investments (e.g. transportation infrastructure improvements) and</p>
<p>California Rural Legal Assistance, Inc. AFFH</p>	<p>In certain sections of its FHA (see, e.g., Section 3.5 (page 3-11), Section 3.13.1 (page 3-82)), the Draft Element includes narrative historical information about patterns of segregation and discrimination throughout California and even Central Valley History. While this historical perspective is welcome as a starting point for meaningful discussion, the narrative inclusions are rendered useless by two key issues. First, they are kept completely separate from all data analysis, as demonstrated in the sections above, which prevents any positive contextualizing power of the historical perspective from meaningfully affecting any conclusions the FHA has drawn to this point. And second, the analysis offered in these</p>
<p>California Rural Legal Assistance, Inc. AFFH</p>	<p>Once the fair housing issues have been identified and examined, the FHA must include "an assessment of the contributing factors, including the local and regional historical origins and current policies and practices, for the fair housing issues identified [in the earlier parts of the FHA]." ⁴⁰ These contributing factors must be considered later as part of the jurisdiction's fair housing related goals and policies (Draft Element's "Housing Plan" Section 5), to give priority to "factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance" and inform the "metrics and milestones used to determine what fair housing results will be achieved." The Draft Housing Element lists a set of Contributing Factors and gives them a prioritization ordering. (Section 3.17, Draft Element 3-109). However, absolutely no summary explanation or rationale is given for the identification of these specific contributing factors over others present in the preceding analysis. Similarly, no</p>

California Rural Legal Assistance, Inc.	Constraints	Section 4 of the Draft Housing Element addresses constraints to development of housing in the County. Although Section 4 goes into sufficient detail to illustrate the regulatory constraints that justify the County's proposed rezoning, it fails to adequately identify or address the infrastructure deficits that are likely to become obstacles to the assumed housing development during the life of this Housing Element.
California Rural Legal Assistance, Inc.	Constraints	Section 4.3 attempts to address infrastructure constraints that may inhibit housing development. ⁴² The section provides some background regarding both the hypothetical infrastructure constraint issues and specific historical examples in Stanislaus county of infrastructure constraints and how they have been handled. However, the section fails to identify specific infrastructure deficits on a site-based or even area-based level adequate to illustrate what infrastructure constraints the current set of chosen sites is facing. This omission could render estimates of housing units to be grossly unrealistic. This is a fatal flaw to the
California Rural Legal Assistance, Inc.	Constraints	Section 4.4.2 of the constraints analysis addresses risk from Earthquakes, Landslides, and erosion, but curiously omits any discussion of flood risk, despite the high number of acres in western Stanislaus county in flood plains. ⁴⁴ This is a key environmental constraint on an even more consistent basis than earthquakes and should not be overlooked.

California Rural Legal Assistance, Inc.	AFFH	<p>The duty to affirmatively further fair housing does not end at the Fair Housing Assessment – it extends fully and emphatically to the Sites Inventory. A jurisdiction’s sites inventory “... shall be used to identify sites throughout the community, consistent with...” its duty to affirmatively further fair housing. Sites must be identified and evaluated relative to the full scope of the assessment of fair housing. To evaluate the Sites Inventory’s consistency with the obligation to affirmatively further fair housing, the site inventory analysis should address both Improved Conditions resulting from siting and the Exacerbated Conditions resulting from siting, along with a consideration of local data and knowledge.⁴⁶ Local data and knowledge to be captured in analysis should include current, planned and past developments, investment, policies, practices, demographic trends, public comment, and other factors such as potential for displacement of residents and infrastructure capacity.⁴⁷ The analysis must ultimately address each of the fair housing issue areas: (1) segregation and integration, (2) racially and ethnically concentrated areas of poverty, (3) access to opportunity, and (4) disproportionate housing needs, including displacement. Critically, the duty to affirmatively further fair housing established in Gov. Code 8899.50 requires not only that public agencies affirmatively further fair housing, but also that they “take no action that is materially inconsistent with [their] obligation to affirmatively further fair housing.” Curiously, the Draft Housing Element chose to place its analyses of Improved and Exacerbated Conditions and the fair housing issue areas in the Fair Housing Assessment instead of in Section 5 (the Sites Inventory). Table 3-15 on page 3-91 shows how many lower-income, moderate-income, and above moderate-income housing units are planned for each census tract throughout the County. Some previously identified community areas, such as Airport, Empire, and Hickman, occupy single census tracts, while others like Bret Harte, North Ceres (includes Bystrom), Oakdale, and West Modesto (includes Rouse) contain multiple census tracts. This</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>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</p>

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:
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
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

California Rural Legal Assistance, Inc.	Sites Inventory	<p>Section 5 of the Housing Element does not provide an assessment of sites with a realistic potential for development, or enough spatial analysis to allow these sites to be assessed as to their capacity to address racially segregated housing or to serve affordable housing needs, and fails to provide other required analysis. California's Housing Element Law requires that Housing Elements include: "An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing." The only specific sites identified and assessed are approved developments, none of which provide any low, very low, or severely low - income housing. No detailed analysis of low-income housing sites is included in the Housing Element. Instead of providing this level of analysis, the Stanislaus Draft Housing Element provides an inventory of more than 400 individual parcels (see Housing Element, Appendix C), most of which are less than one acre in size and thus are unlikely to be developed to include significant percentages of low or very low income housing. Instead of removing from this list those parcels unlikely to be developed due to size, or other factors, the Sites Analysis proposes to assess potential housing capacity by adding all acres and multiplying by density allowed under existing zoning to come up with the "realistic" capacity for development, allowing for a variation based on typical densities for past multifamily developments. The result is an assumed number of available housing units to meet RHNA housing units needed without any</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>Sites smaller than half an acre are subject to their own realistic site capacity analysis. Under Housing Element Law, "a site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as</p>
California Rural Legal Assistance, Inc.	Sites Inventory	<p>In addition to small sites, sites larger than 10 acres are also subject to their own realistic site capacity analysis. Sites larger than 10 acres cannot be used to accommodate lower income housing need unless the locality can demonstrate that "sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site" or if the locality is able to present other evidence to convince HCD that it is developable as lower income housing. Although they are each technically smaller than 10 acres, the 5 sites along Tucson Avenue</p>

California Rural Legal Assistance, Inc.	Sites Inventory	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. ⁵³ The 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
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 housing ⁵⁷ , no mention is made of Farmworkers whatsoever in the
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
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
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

California Rural Legal Assistance, Inc.	AFFH	Government Code section 65583.2(b)(4) requires that a Housing Element provide in the analysis a general description of any known environmental or other features (e.g., presence of floodplains, protected wetlands, oak tree preserves, very high fire hazard severity zones) that have the potential to impact the development viability of the identified sites. Guidance provided by HCD's "Housing Element Site Inventory Guidebook" further clarifies the requirement: "The housing element need only describe those environmental constraints where documentation of such conditions is available to the local government. This analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities. This information need not be identified on a site-specific basis. However, local governments will find it beneficial to describe site specific environmental conditions when demonstrating site suitability and realistic buildout capacity of each site, as these types of impediments to building must be considered when determining how many residential units can be developed on the site." The Draft Housing Element's analysis of Environmental Constraints in Section 4.4 consists of a paragraph that is shorter in length than HCD's direction regarding how such constraints should be identified. This paragraph references an "Environmental Justice Technical Report" without providing any citation, link, or
California Rural Legal Assistance, Inc.	Programs	Policies 1A and 1E reiterate the County's already existing duty to enforce its own housing and building codes.
California Rural Legal Assistance, Inc.	Programs	Policy 1D requires the County to preserve at-risk units of publicly assisted affordable housing. ⁶⁴ However, the County previously stated at multiple points in the Housing Element that there is no publicly assisted affordable housing stock in the unincorporated county, which seems to render this Policy and Program 1-4 purely hypothetical. ⁶⁵ Clarification should be added to indicate if there are aspects of this
California Rural Legal Assistance, Inc.	Programs	Action 1-1a requires the county to provide housing rehabilitation assistance, but at a rate of only three households helped per year. This rate is too low.
California Rural Legal Assistance, Inc.	Programs	Action 1-1c requires only the maintenance of a pre-existing program.

California Rural Legal Assistance, Inc.	Programs	Programs 1-2 and 1-3 require the County to update local laws to comply with regulations already in place at the state level – these are legal obligations the County would have regardless of their inclusion as programs in the Housing Element.
California Rural Legal Assistance, Inc.	Programs	Low-income tenant protections have proven time and again to be one of the most effective ways to preserve the existing affordable housing in a jurisdiction. Some possible programs to this effect may include: -Rent Stabilization Program (including for mobile home parks). -Good cause eviction ordinance. - Ordinance prohibiting discrimination against recipients of Section 8 and other rental housing subsidies. -
California Rural Legal Assistance, Inc.	Programs	Since displacement is a high priority issue in the County, programs to prevent displacement could also be helpful here: oExpanding By Right Approval Program (3-4) to types of sites beyond those prescribed by statute. -Neighborhood Land Banking Program. -Program to proactively facilitate the purchase of at-risk properties by local nonprofit developers, community land trusts, and/or tenant organizations. -
California Rural Legal Assistance, Inc.	Programs	In addition to the requirement to conserve and improve the condition of existing affordable housing stock, the Housing Plan is required to “assist in the development of adequate housing to meet the needs of extremely low, very low, low- and moderate-income households.” One of the Housing Plan’s methods of addressing this requirement is the set of programs under Goal 2. There are several good programs here – the Density Bonus Law update is a mandatory but positive step toward making affordable housing happen, the steps described in Program 2-1 to assist affordable housing developers are on point and useful, and the Housing Trust Fund, if it is actually created, will be a welcome addition to the affordable housing resources available in Stanislaus County. The only significant issue under Goal 2 is Action 2-2b, the County’s plan to “discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond state law is appropriate for the County.” ⁶⁷ Increasing the Density Bonus for market-rate projects beyond state law is impermissible under
California Rural Legal Assistance, Inc.		Due to inadequacies in community outreach and public engagement, the Fair Housing Assessment, the Sites Inventory, and throughout the Draft Housing Element, we strongly recommend that the Draft Housing Element be revised prior to submission to the HCD. Because of the large number of proposed rezones and the likelihood that the proposed actions will still fall short of meeting housing targets, we suggest that Stanislaus County delay finalization of the Housing Element until better site analysis can be completed that yields a more concrete proposal for achieving housing goals. The Housing Element
Community Member	Sites Inventory	I want to include my property in the 6th cycle of Stanislaus county Housing Element. My property 16245 Clover Ave Patterson Ca 95363 with APN: 048-038-027 is in the county limits and within the sphere of influence of City of Patterson. 16245 Clover Ave Patterson Ca 95363 is in General AG 20 zoning with

Community Services Agency	Chapters 2, 3, & 6	<p>Page 2-31 – in the first full paragraph services offered for prevention are CalFresh and Medi-Cal. You can also add CalWORKs which is cash aid for families. CHS provides shelter, transitional housing and rapid rehousing for youth and their children, not to all individuals and families.</p> <p>· Page 3-78 – Missing is the Access Center Emergency Shelter, Organization is Salvation Army, 330 9th Street, Modesto, CA 95351. Total beds is 180</p>
Department of Environmental Resources	Chapter 4	<p>Page 171 Table 4-3: In the footnote section, the source was cited to be the zoning ordinance. However, to strengthen our case, I recommend that we also cite Stanislaus County LAMP as the LAMP is the spin-off of the State's OWTS Policy. Page 175 In the Farmworker/Employee Housing section, the following verbiage was mentioned, "The County Department of Environmental Resources is responsible for permitting, inspection, and reinspections of all employee housing, labor camps, dairy farm labor camps, and labor supply camps, pursuant to Health and Safety Code, Division 13, Part 1, also known as the Employee Housing Act, and California Code of Regulations, Title 25, Division 1, Chapter 1, also known as the Employee Housing Regulations."</p> <p>I recommend it gets replaced with "The County Department of Environmental Resources is responsible</p>
Modesto Irrigation District	Utilities	<p>Del Rio</p> <p>☐ There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Swim ID – ID No. 163) that lies within the proposed property housing site parcel, APN 004-001-057.</p>
Modesto Irrigation District	Utilities	<p>Empire</p> <p>☐ There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Townsite ID – ID No. 18) that crosses S. Abbie St east to west near or within the proposed housing sites.</p> <p>☐ There is an existing thirty (30) inch concrete Improvement District (ID) pipeline (Townsite ID – ID No. 183) that comes off of the ID No. 18 pipeline and heads south, east of S. Abbie St. and lies near or within the proposed housing sites.</p> <p>☐ There is an existing thirty (30) inch private concrete pipeline that travels south along the west side of S. Abbie St.</p> <p>- MID owns an existing thirty-six (36) inch concrete pipeline known as the Highline Pipeline that lies near or within the proposed housing sites north of Yosemite Boulevard.</p>

Modesto Irrigation District	Utilities	<p>Southwest Modesto</p> <p>☐ 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.</p> <p>☐ 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.</p> <p>☐ 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.</p> <p>☐ 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.</p> <p>☐ 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.</p> <p>☐ There is an existing thirty-six (36) inch abandoned in place pipeline that lies near or within the vicinity</p>
Modesto Irrigation District	Electrical	<p>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.</p> <ul style="list-style-type: none"> • 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

		<p>The following government statute guides the county as to which sites should be included in the final inventory.</p> <p><i>Gov. C. 65583(a)(3)An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing.</i></p> <p>Section HE-62 of the adopted 5th cycle Housing Element includes the zoned residential land encompassed in the Salida Community Plan. However, in the draft 6th cycle, this land has been removed from the draft "due to the inability to advance infrastructure development over the previous Housing Element Cycle." (Page 4-36) The county should reject removing or "demoting" the Salida Community Plan from the draft. Domestic water infrastructure for the Salida Community Plan is dependent on the City of Modesto's Water Master Plan. Progress on reaching an agreement for the City of Modesto to supply water to the Salida Community Plan will only be achieved after Modesto adopts a new General Plan and</p>
Salida Resident	Chapter 4	It is imperative that cities and counties include as many high or highest resource sites as possible in their Housing Element site inventory. The ratio of these sites to other lower resource sites should be 1:1. The City/County should overlay the high opportunity zones on the housing inventory map to determine sufficient high opportunity sites are included and/or identify additional high opportunity sites to be
Self-Help Enterprises	AFFH	
Self-Help Enterprises	Programs	We encourage City/County partners to adopt a program to review all surplus property within one year of adoption of the Housing Element and make those sites available for the development of affordable housing. There are provisions in the Surplus Land Act (SLA) which allow for an expedited process for sites that qualify as "exempt surplus land" which is land determined by a local agency and verified by HCD and
Self-Help Enterprises		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
Self-Help Enterprises	Sites Inventory	impressive inventories of available sites, when in fact most have no feasibility for development. Suitable sites must include: <ul style="list-style-type: none"> a. Sewer, water, and dry utilities proximate to the site in question, without a need for upsizing or significant offsite development. b. A significant portion of the available acreage in the adequate sites inventory (at least 50%) should have minimum parcel sizes of 2.5 to 3 acres (and larger if onsite storm drainage is required.)
Self-Help Enterprises	Programs	The City/County should consider adding a program to revise its zoning ordinance to add Manufactured Home on a Permanent Foundation to be allowed in all zones that allow singlefamily residences. The

Self-Help Enterprises Programs

The City/County should consider a fee waiver program for projects that include 100% affordable housing serving households below 80% of area median income. If the City/County is unable to waive fees, we strongly encourage deferral for a period not to exceed 30 years with the deferral recorded as a form of deferred note and secured by the property for affordable single-family housing development and 55

This page intentionally left blank.