

3 Affirmatively Furthering Fair Housing

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

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

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

3.1 Local Analysis

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

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

Table 3-1 Census-Designated Places in Stanislaus County

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

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

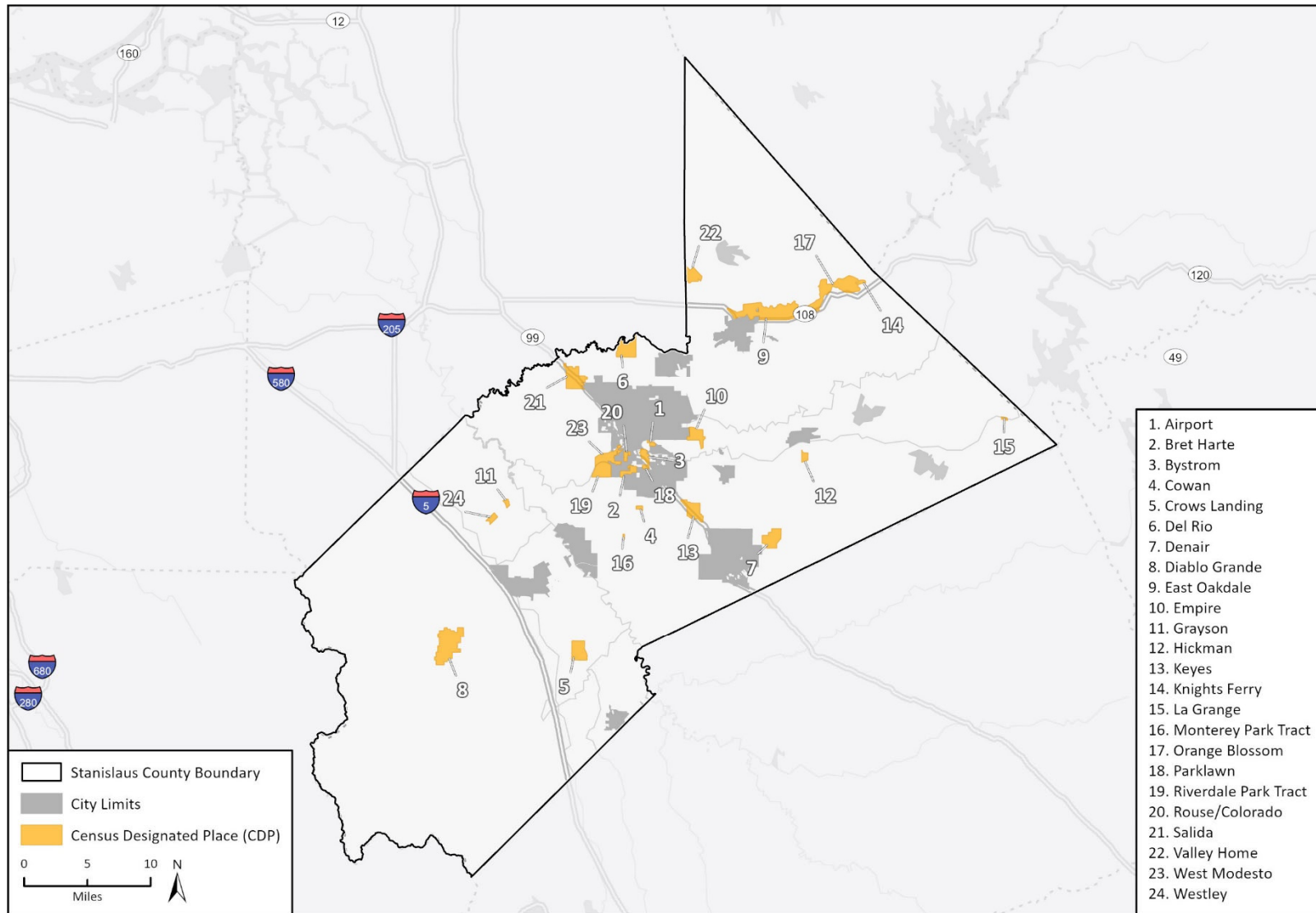
** The Bystrom CDP is located in the North Ceres area.

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

Source: ACS 2020 Decennial Census, P1

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

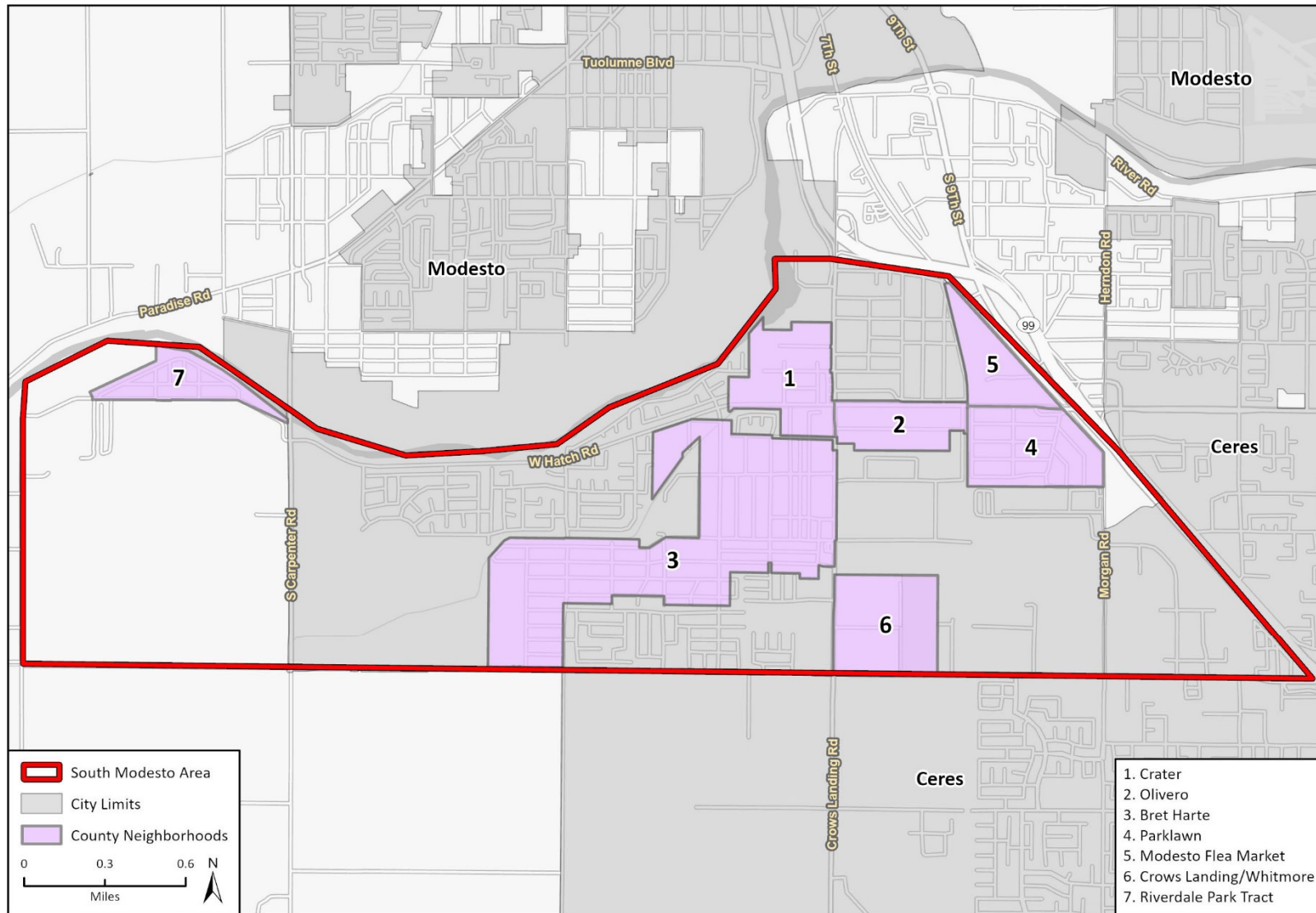
Figure 3-1 Stanislaus County Cities and CDPs



Basemap provided by Esri and its licensors, 2024.
Additional data provided by the U.S. Census Bureau, 2020.

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Fig X Stanislaus County Census Designated Places

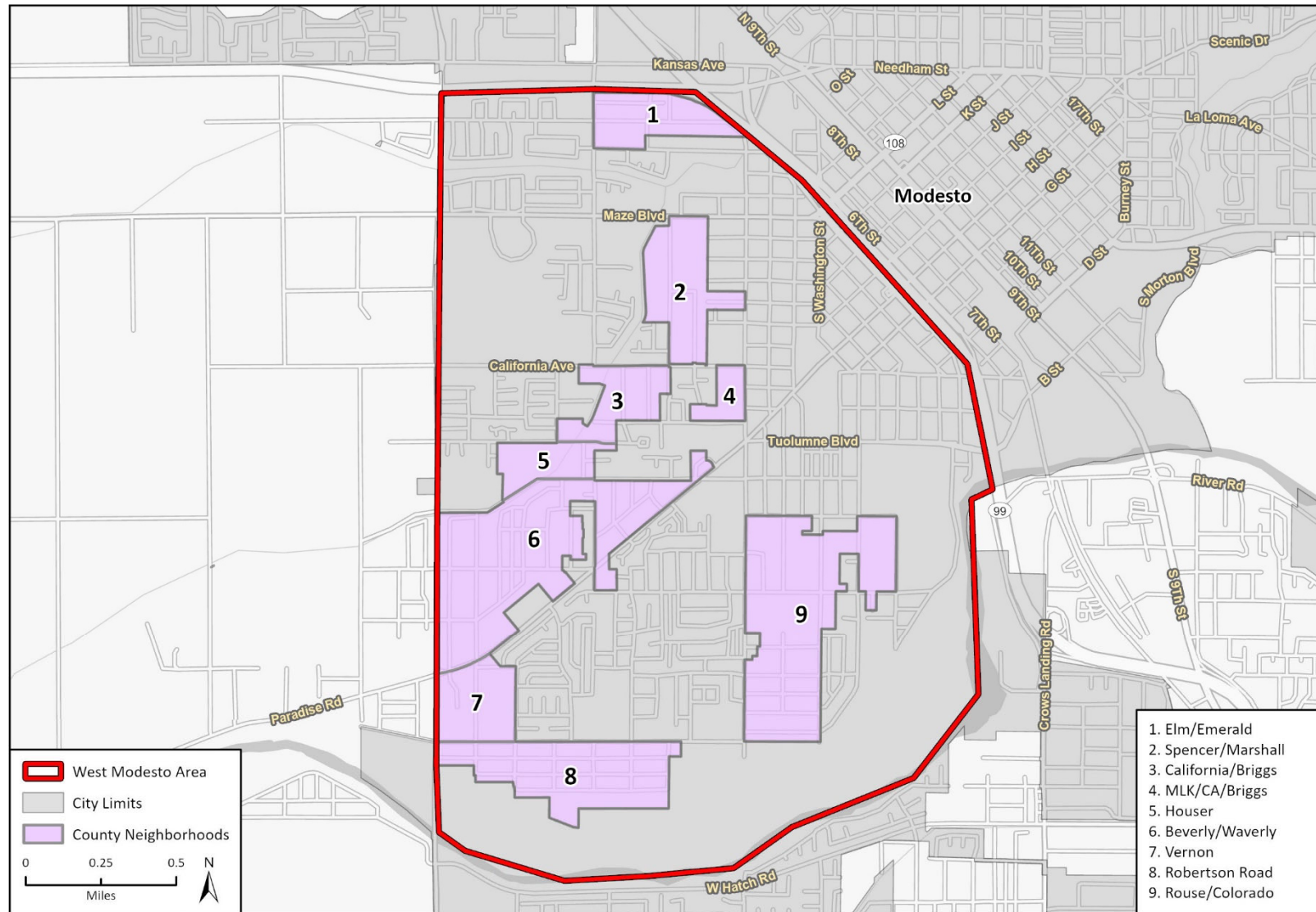
Figure 3-2 South Modesto Area



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

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Fig X South Modesto Area

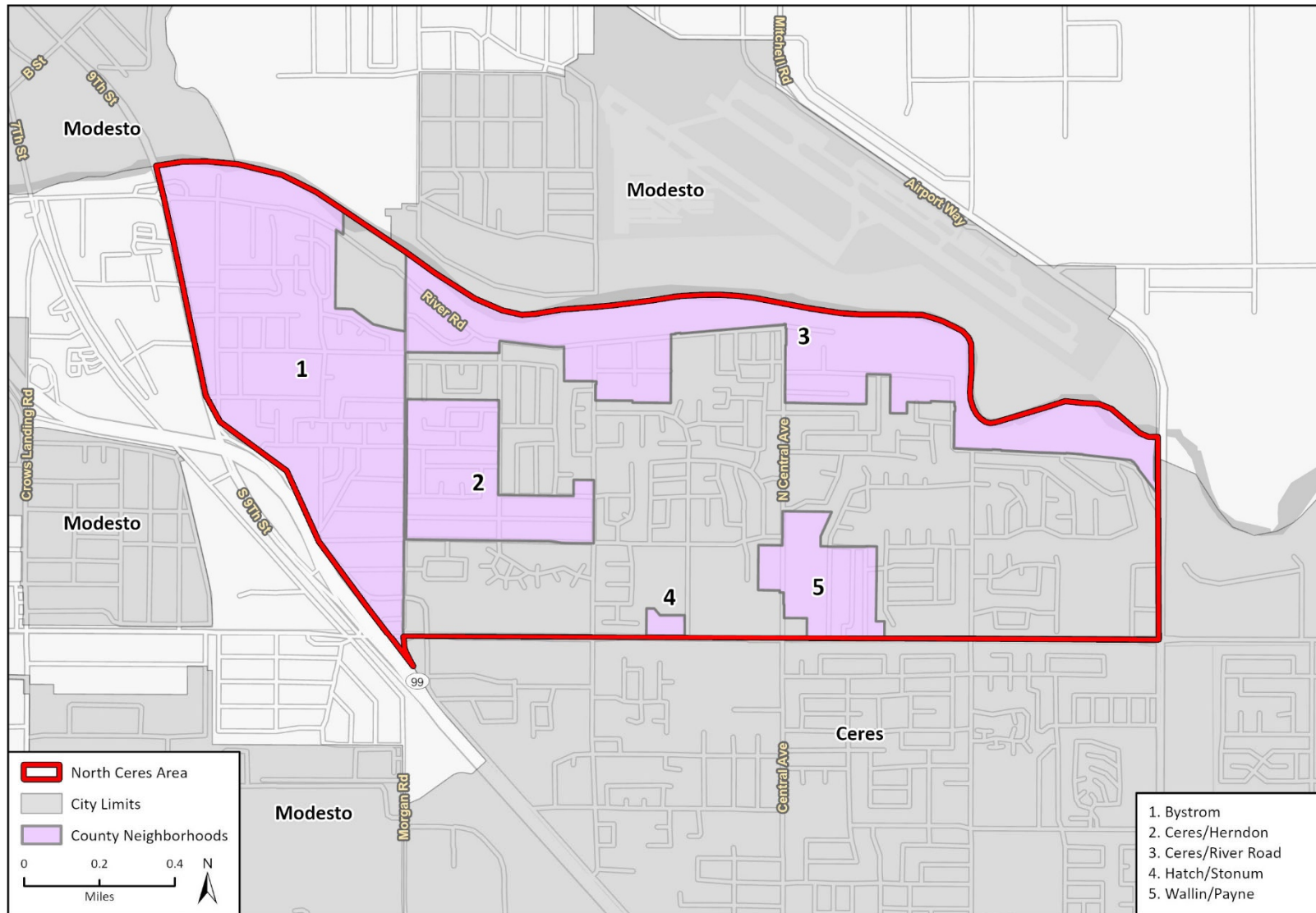
Figure 3-3 West Modesto Area



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

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Fig X West Modesto Area

Figure 3-4 North Ceres Area



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

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Fig X North Ceres Area

3.2 Regional Analysis

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

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

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

3.3 Fair Housing Methodology

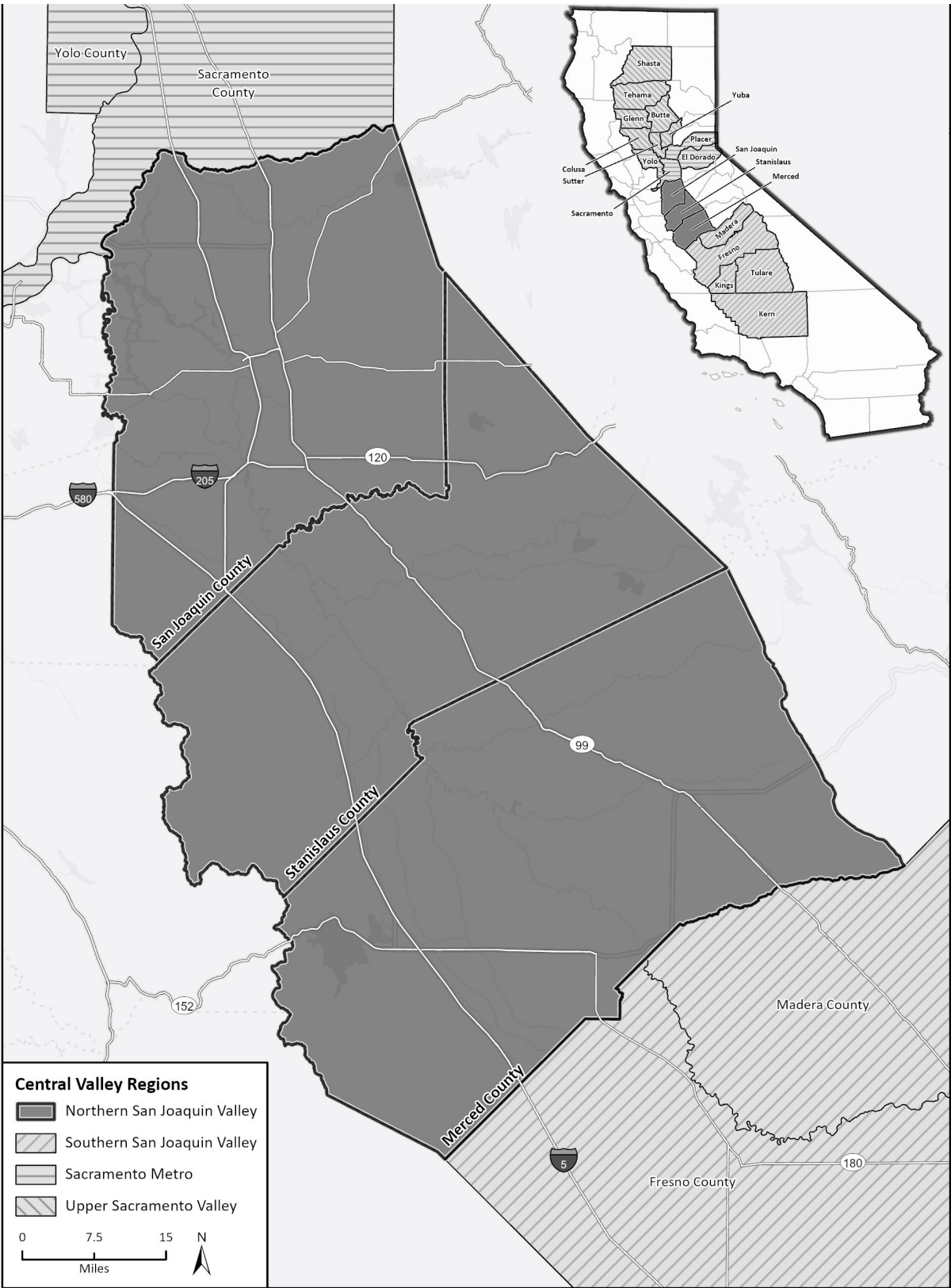
This assessment has been prepared consistent with the California Department of Housing and Community Development (HCD) Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance Memo) which provides guidance on the preparation of housing elements and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

3.3.1 Data Sources

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

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

Figure 3-5 Northern San Joaquin Valley Region



Basemap provided by Esri and its licensors, 2023

HE_AFFH
Fig X Regional Location

Housing and Community Development's AFFH Data Viewer

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

Urban Displacement Project (UDP)

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

CalEnviroScreen

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

California Tax Credit Allocation Committee (TCAC)

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

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

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

AllTransit

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

Comprehensive Housing Report for the San Joaquin Valley

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

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

Stanislaus County Analysis of Impediments to Fair Housing

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

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

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

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

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

Stanislaus County Disadvantaged Unincorporated Communities Report

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

Community Engagement

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

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

3.4 Fair Housing Resources

3.4.1 Enforcement and Outreach Capacity

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

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

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

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

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

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

Fair Housing Resources

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

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

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

Table 3-2 Fair Housing Organizations Active in Stanislaus County

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

3.4.2 Compliance with Fair Housing Laws

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

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

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

3.4.3 Ability to Address Complaints

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

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

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

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

3.4.4 Findings, Lawsuits, Enforcement Actions, Settlements or Judgments

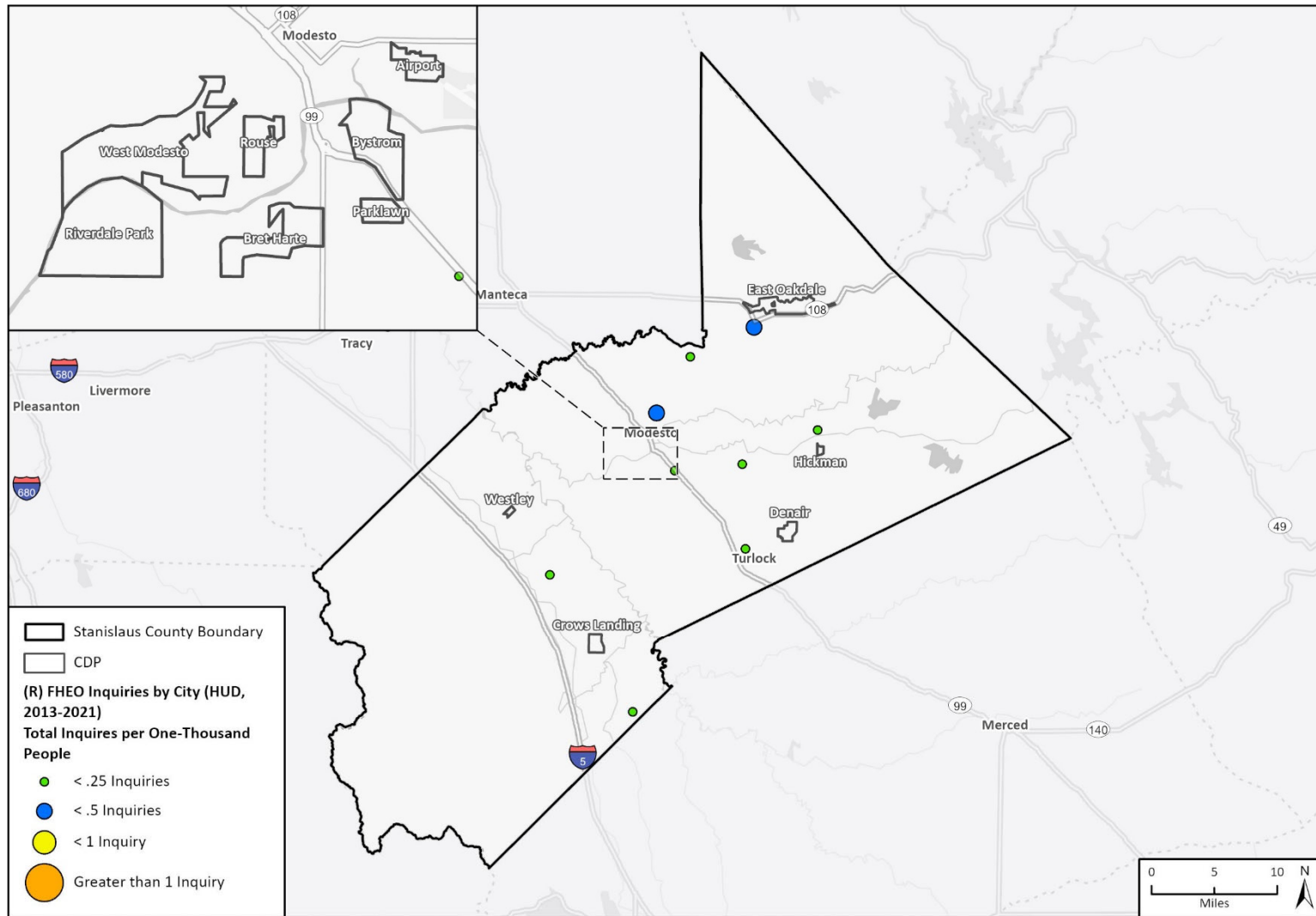
There have been two legal agreements over the last 30 years focused on residential development in unincorporated Stanislaus County.

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

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

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

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



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

HE_AFFH
AFFH - County

Source: AFFH Data Viewer

3.5 Segregation and Integration Patterns and Trends

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

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

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

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

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

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

3.6 Race and Ethnicity

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

Local Trends

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

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

Table 3-3 Racial/Ethnic by Census Designated Place

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

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

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

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

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

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

Source: ACS Data 2020 5 year Estimates, Table DP05

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

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

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

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

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

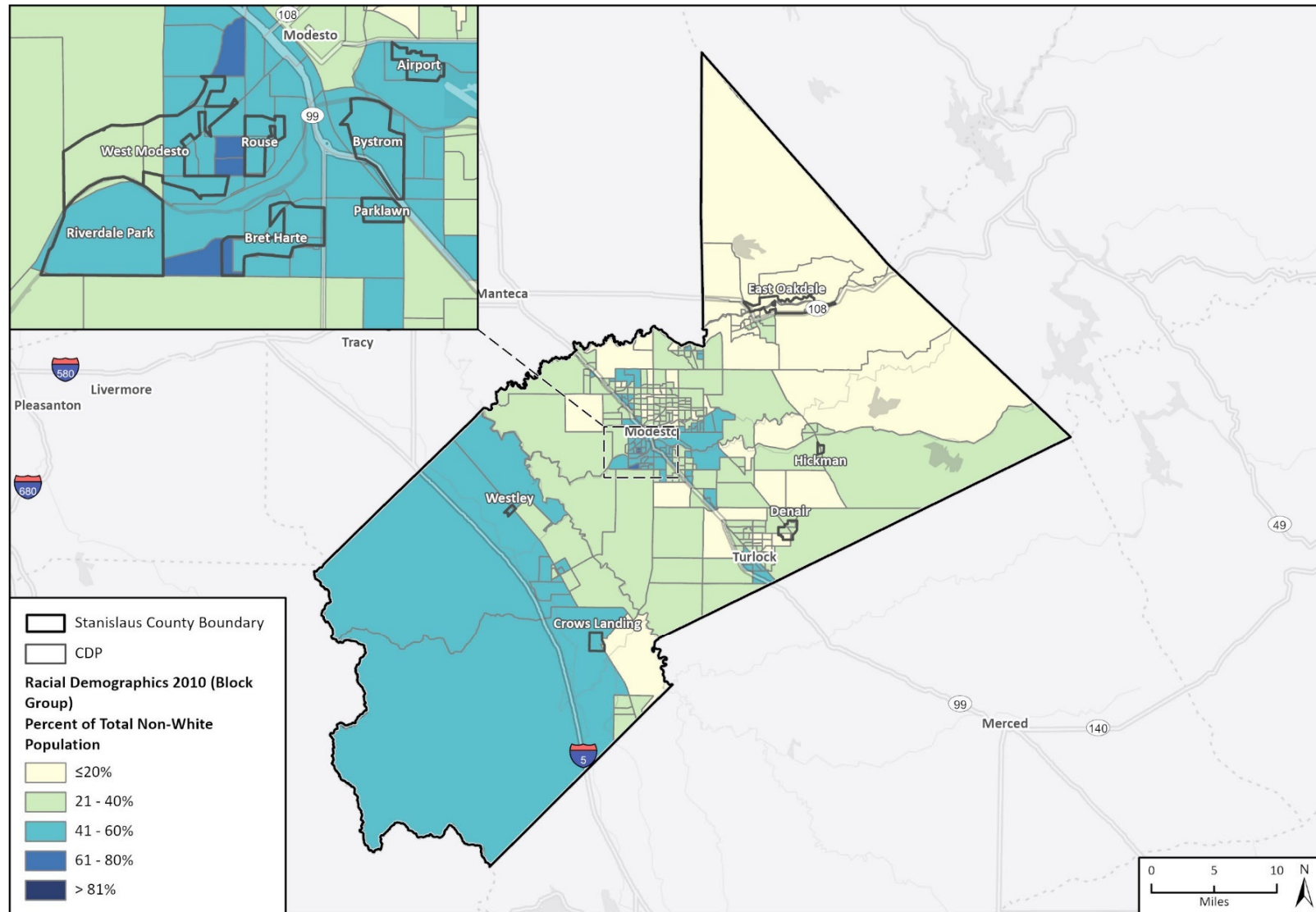
According to the University of California, Berkeley’s Othering and Belonging Institute, people of color (POC) are highly segregated in several census tracts within and surrounding the southern part of the City of Modesto and the City of Ceres (Figure 3-11). White residents are highly segregated in the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

Regional Comparison

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

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

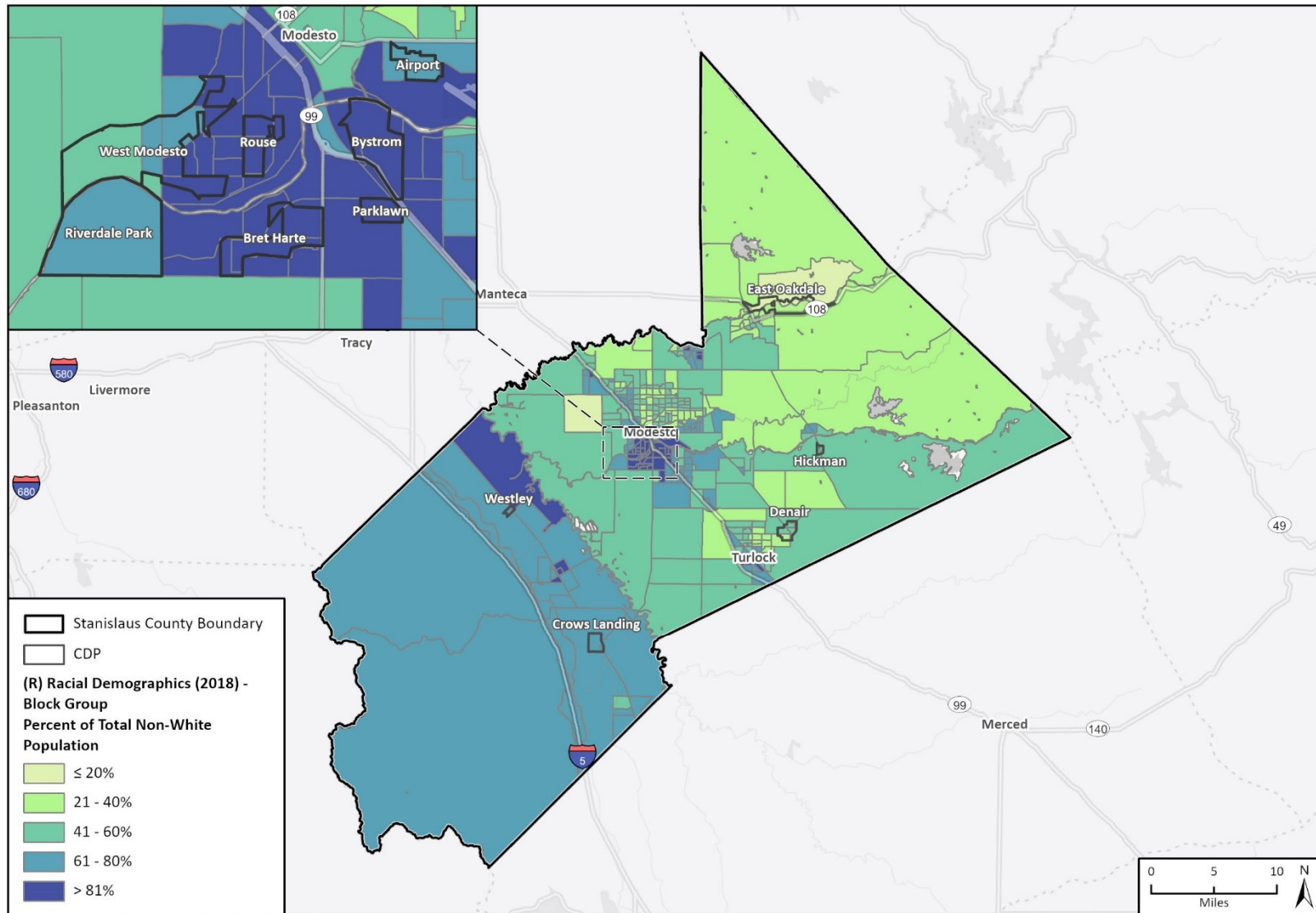
Figure 3-7 Percent of Total Non-White Population in 2010 by Block Group, Stanislaus County



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

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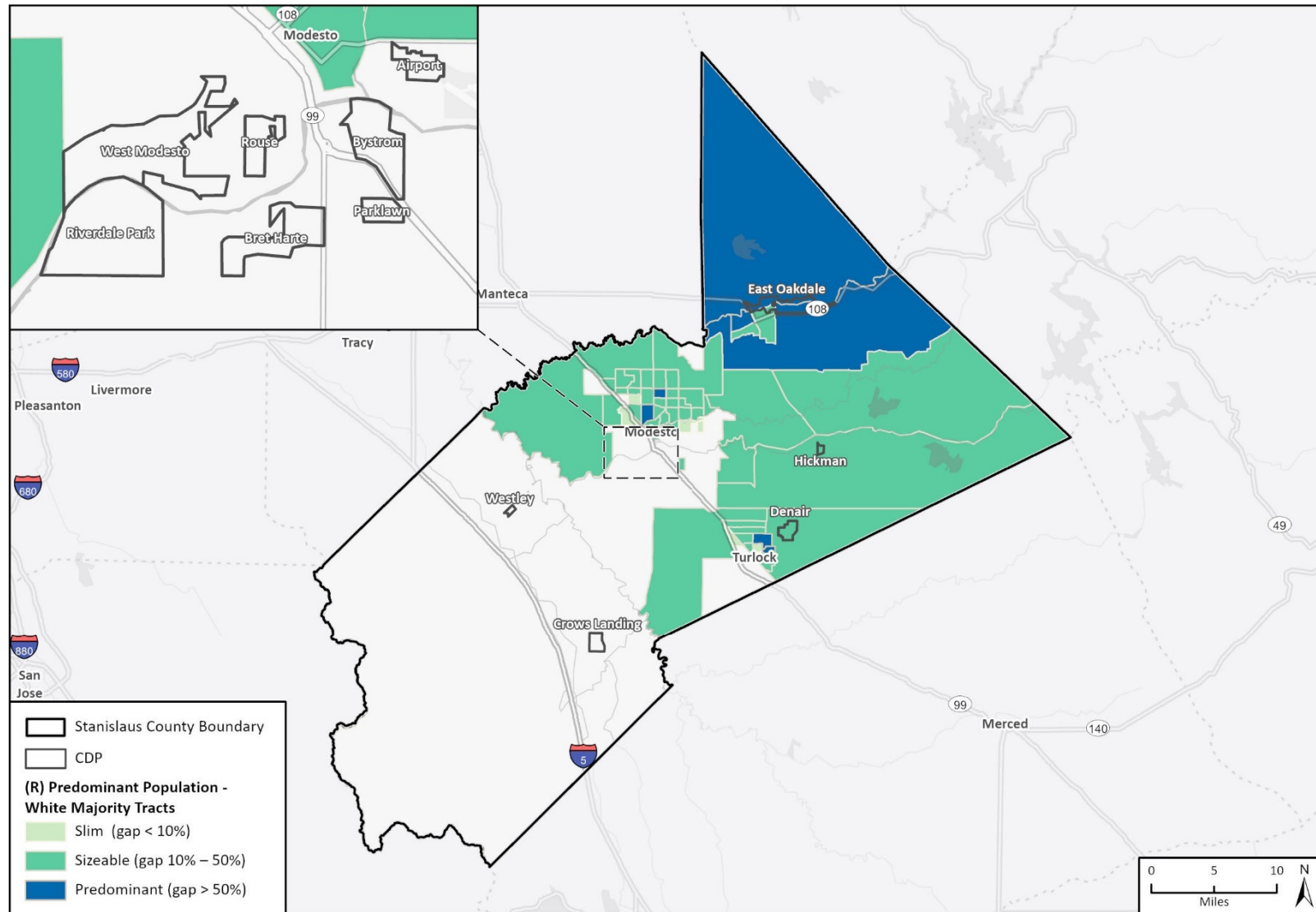
Figure 3-8 Percent of Total Non-White Population in 2018 by Block Group, Stanislaus County



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

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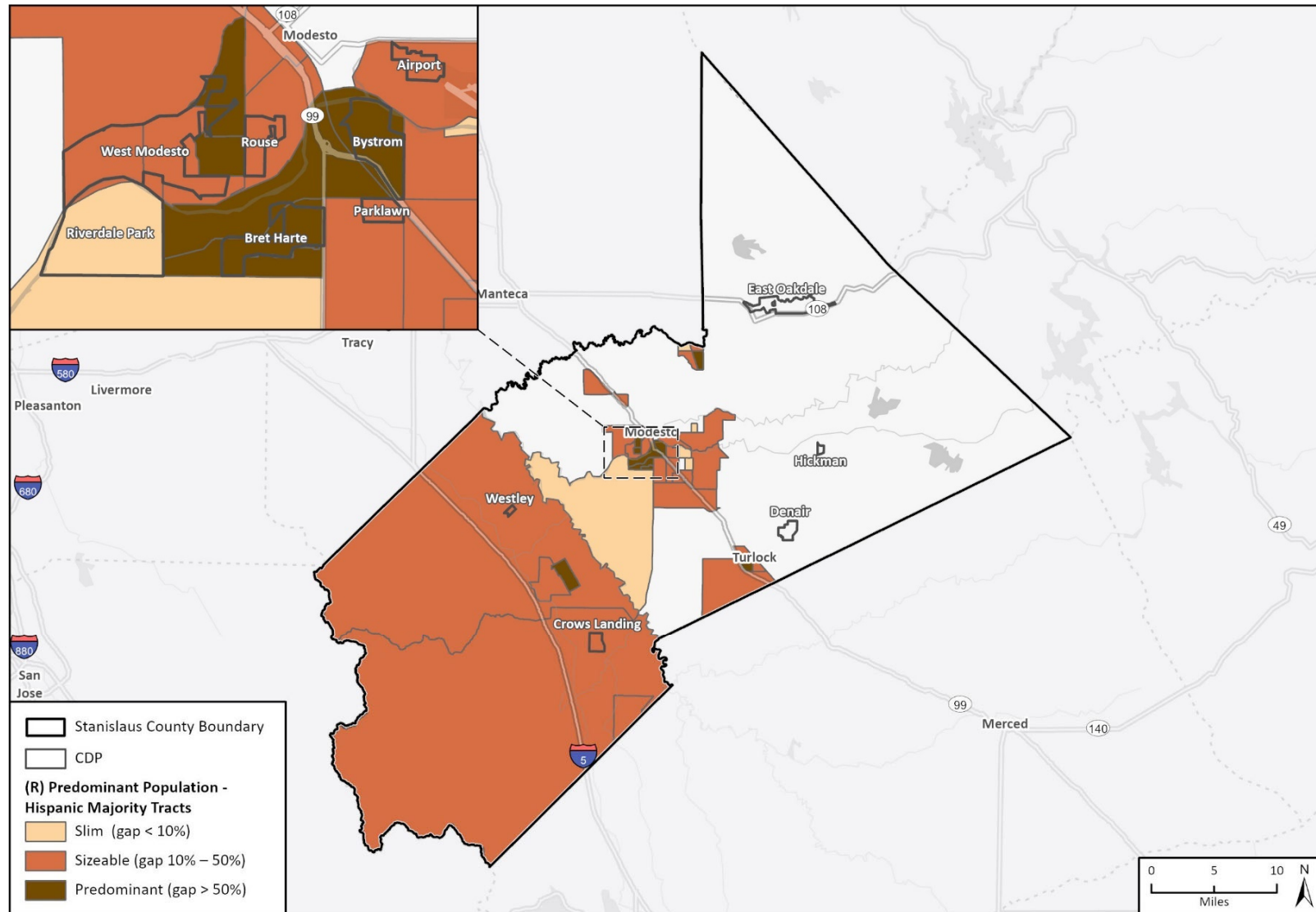
Figure 3-9 2018 White Majority Tracts, Stanislaus County



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

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Figure 3-10 2018 Hispanic Majority Tracts, Stanislaus County



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

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Figure 3-11 Racial Segregation and Integration, Stanislaus County

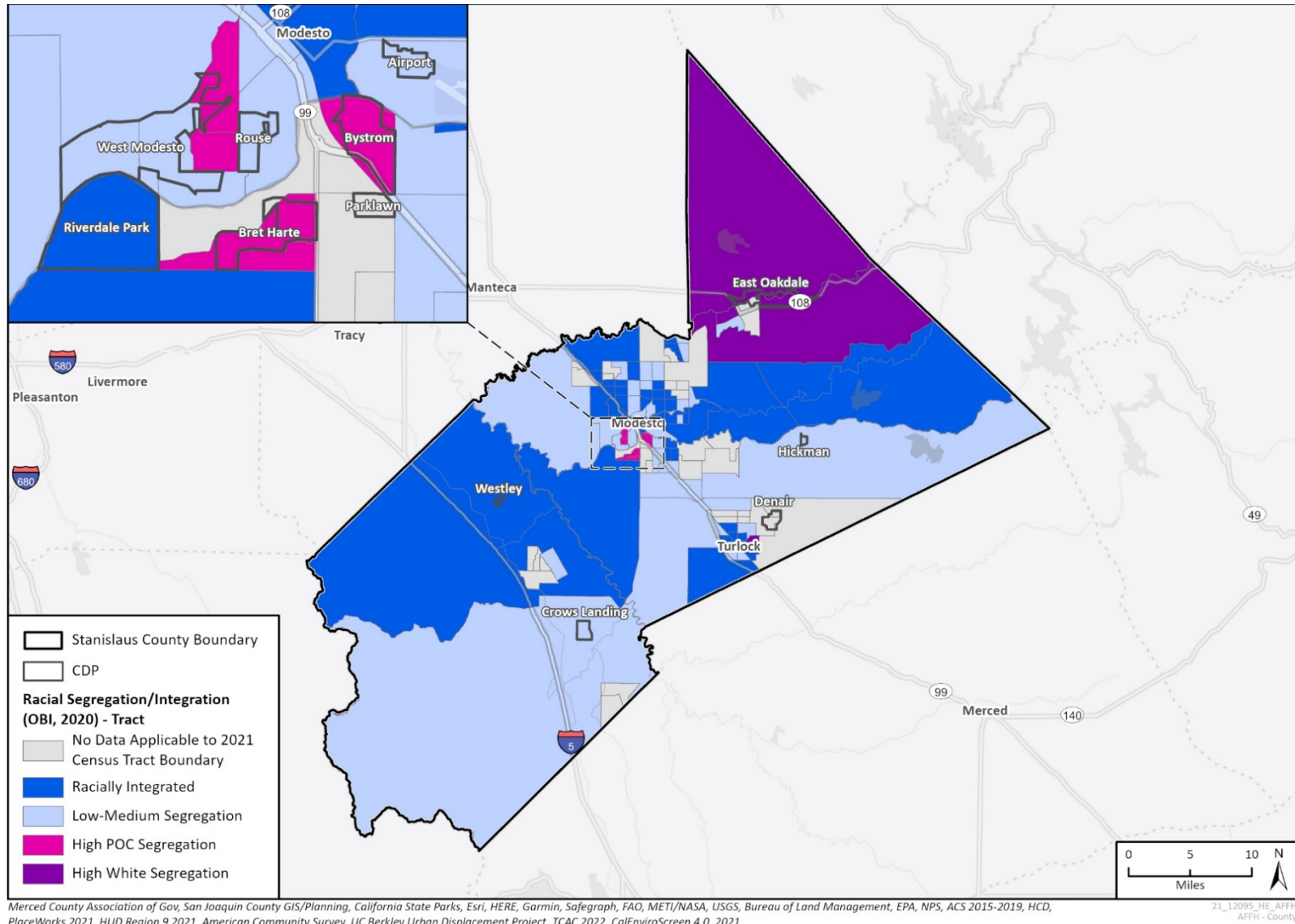
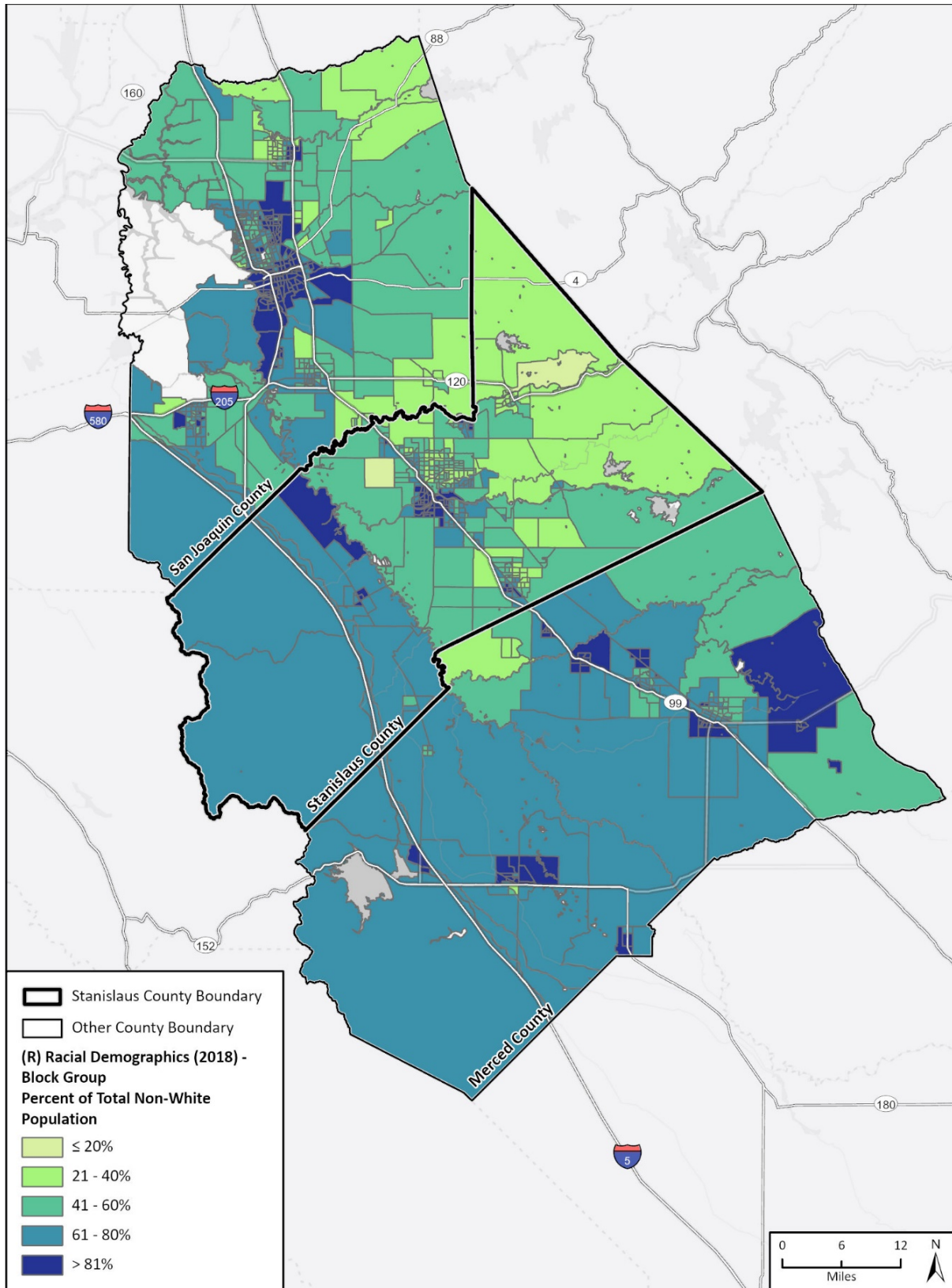


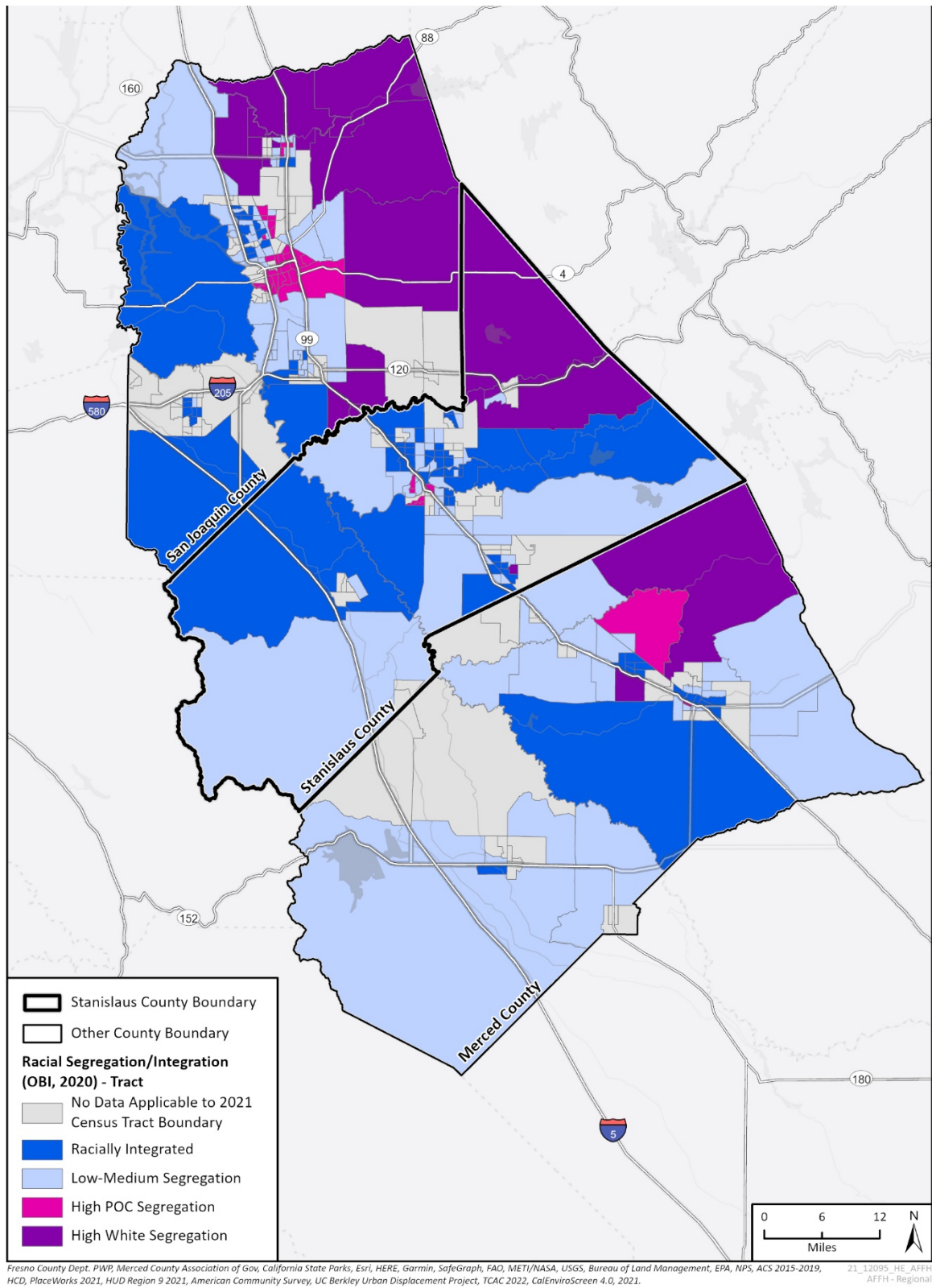
Figure 3-12 Percentage of 2018 Population that is Non-White by Block Group, Region



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

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Figure 3-13 Racial Segregation and Integration, Region



3.7 Persons with Disabilities

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

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

Local

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

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

Table 3-5 Disability in Stanislaus County

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

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

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

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

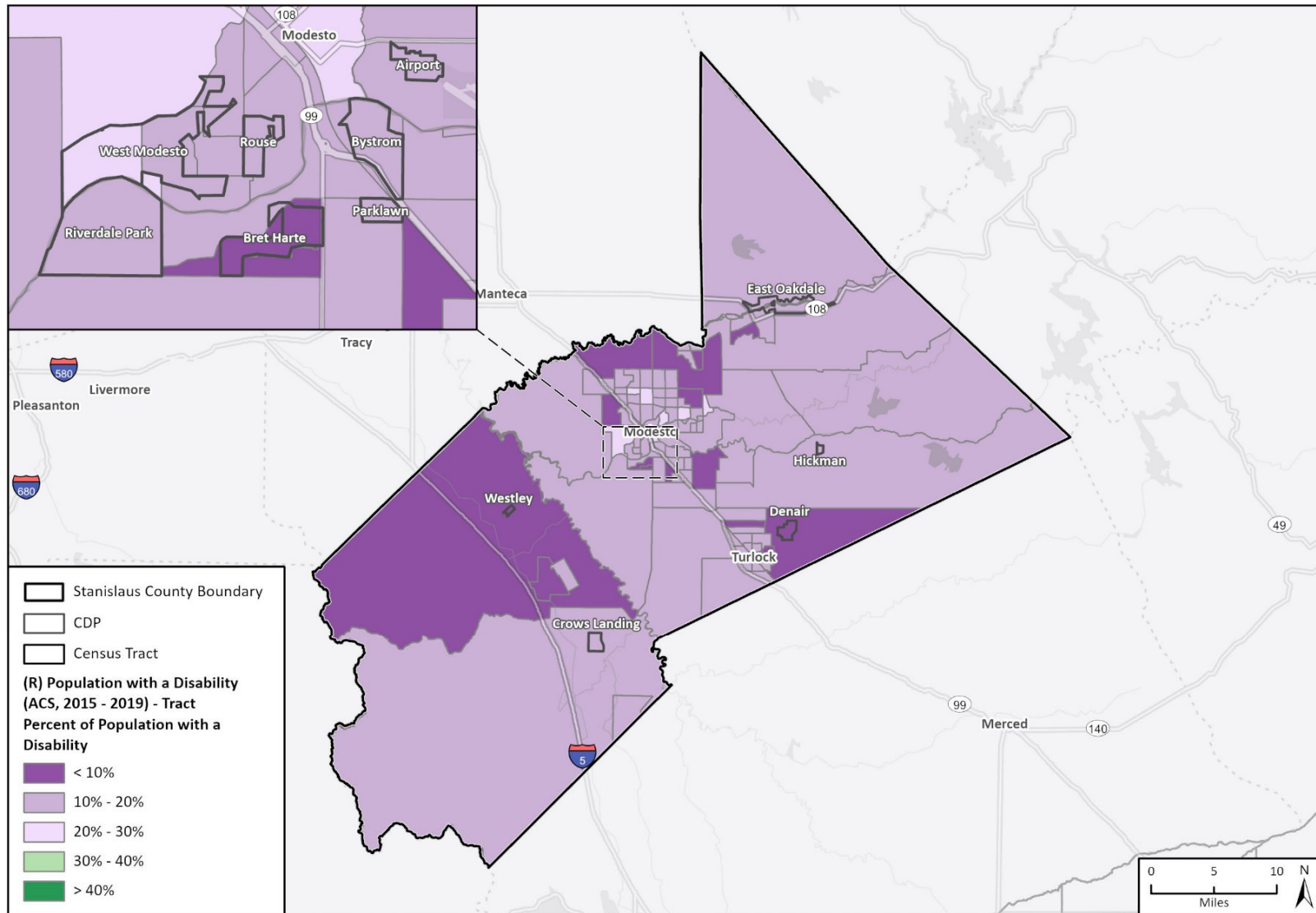
⁹ The Rehabilitation Research and Training Center on Disability Statistics and Demographics 2020. <https://disabilitycompendium.org/annualreport>

Regional Comparison

Stanislaus County has a similar distribution of population living with a disability to the Northern San Joaquin Valley. In the region, approximately 12.5 percent of the total population live with one or more disabilities with the most common disability being hearing difficulty¹⁰. In most of the Northern San Joaquin Valley region, 10 to 20 percent of the population have a disability. Throughout the central part of the region, there are some areas with a lower concentration of persons living with a disability (less than 10 percent of the population). The areas with the highest percentage of individuals with a disability (20 to 30 percent) are located near major cities and along major highways (Figure 3-15).

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

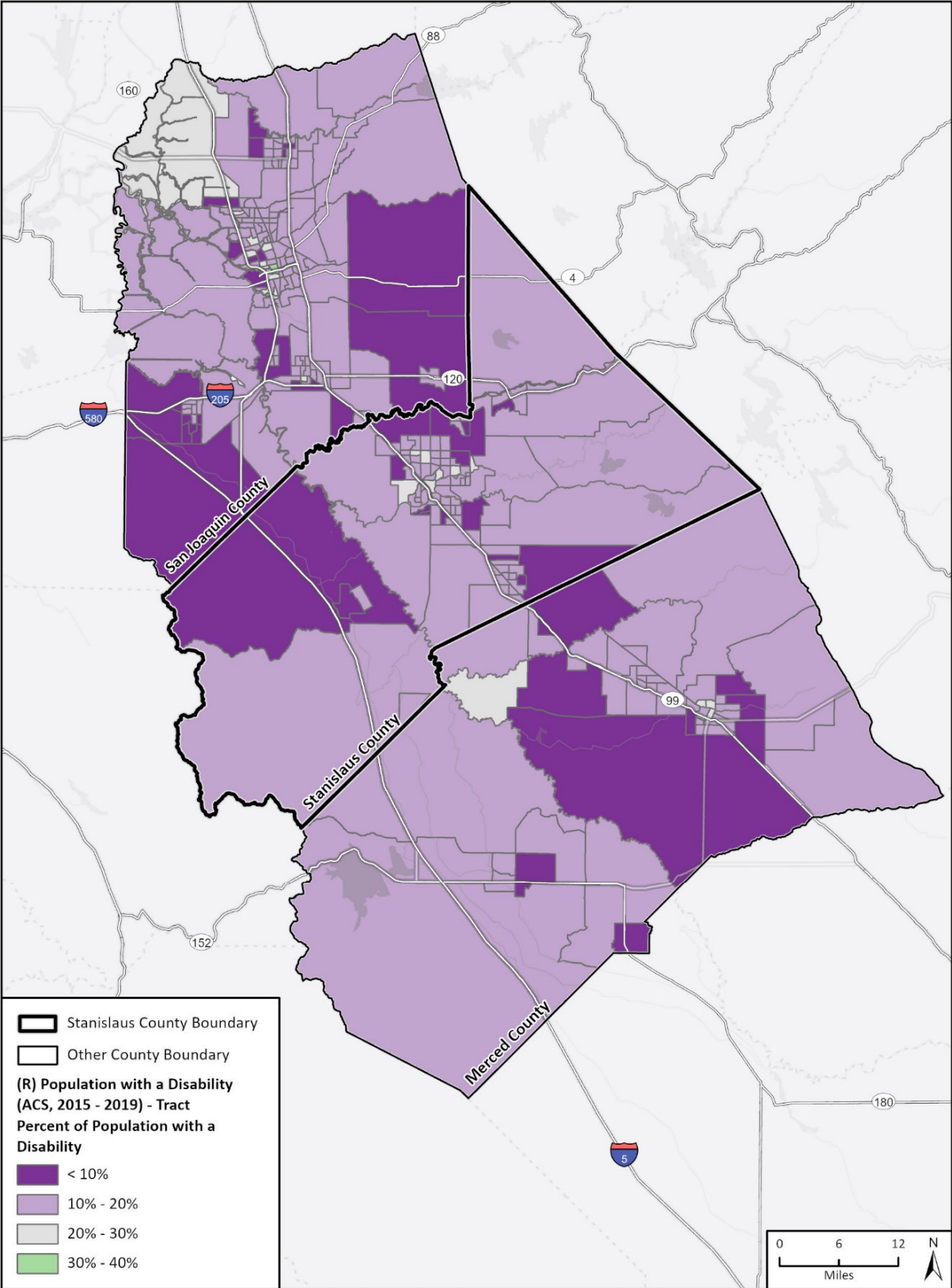
Figure 3-14 Population with a Disability by Census Tract, Stanislaus County



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

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



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

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3.8 Familial Status

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

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

Local Trends

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

Female-headed households with no spouse present with children present make up 5 percent of households in unincorporated Stanislaus County. The CDP of Empire is the area with the highest percentage of female-headed households (40-60 percent of all households), as seen in Figure 3-17. In CDPs throughout the rest of the County, less than 20 percent of children live in female-headed households. Areas with the highest percentage of female-headed households with children are in more urban areas, such as the cities of Modesto and Turlock. Most rural areas of the County have a low percentage of children living in female-headed households, less than 20 percent. Areas with a high percentage of children living in female-headed households overlap with areas that have a lower median household income, higher poverty rates, and higher percentage of renter occupied housing units.

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

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

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

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

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

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

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

Table 3-7 Large Households

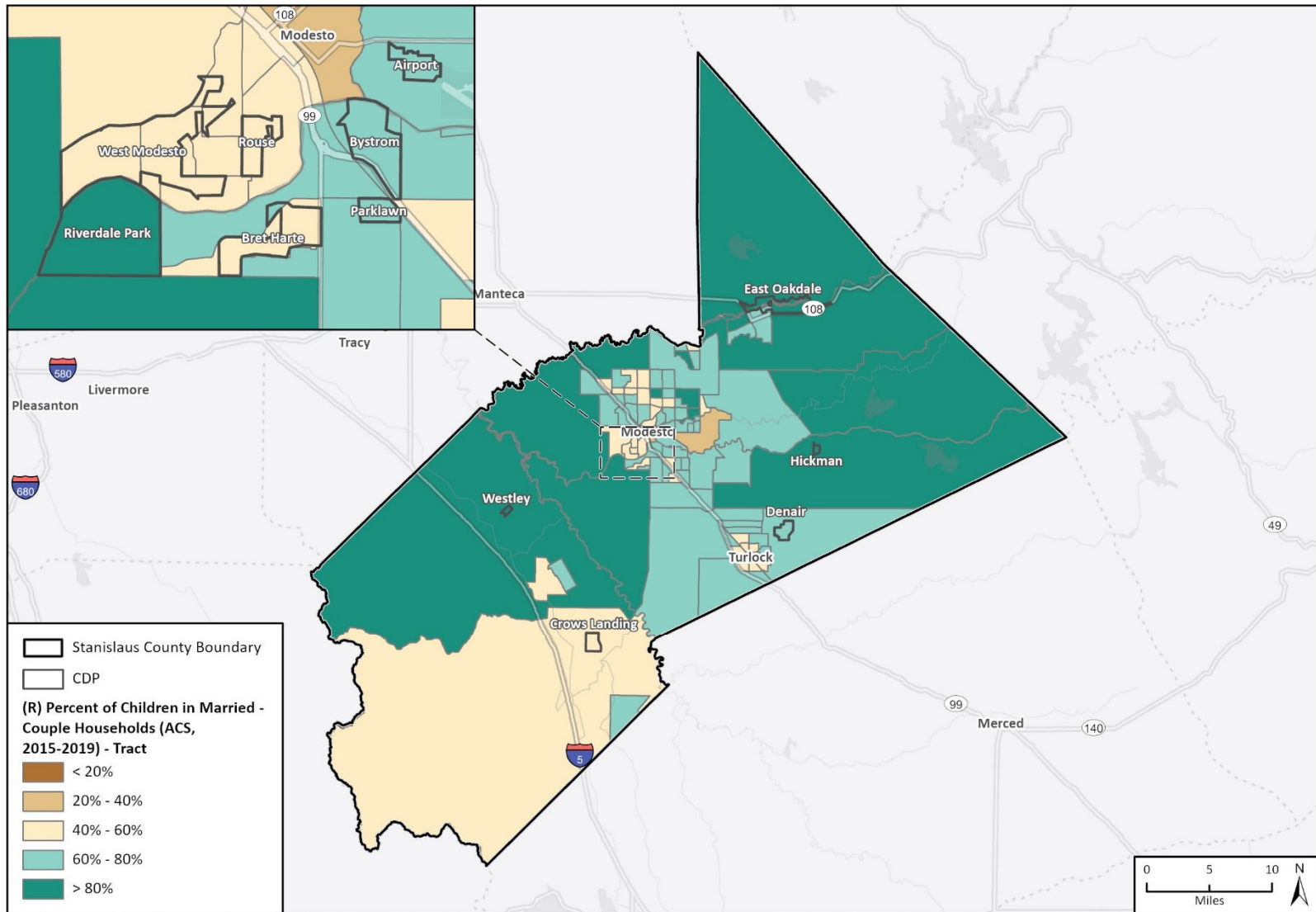
	Unincorporated Stanislaus County		Stanislaus County		California	
	Number	Percent	Number	Percent	Number	Percent
Total Occupied Housing Units	34,313		173,898		13,103,114	
Total Large Households (5 or More Persons)	7,021	20.5%	30,028	17.3%	1,809,518	13.7%
5-Person Household	3,673	10.7%	16,578	9.5%	1,025,856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

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

Regional Comparison

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

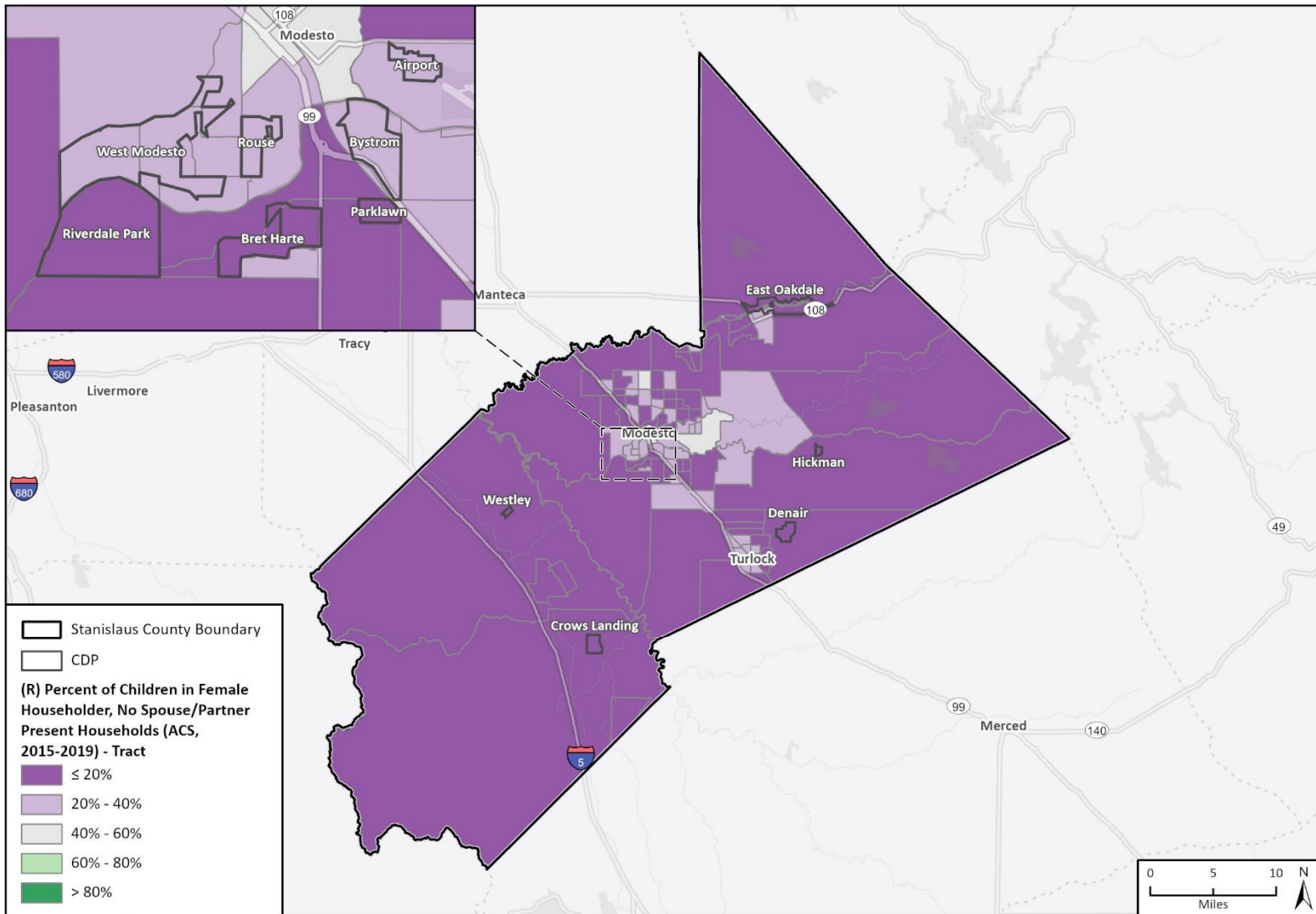
Figure 3-16 Children in Married-Couple Households by Census Tract, Stanislaus County



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

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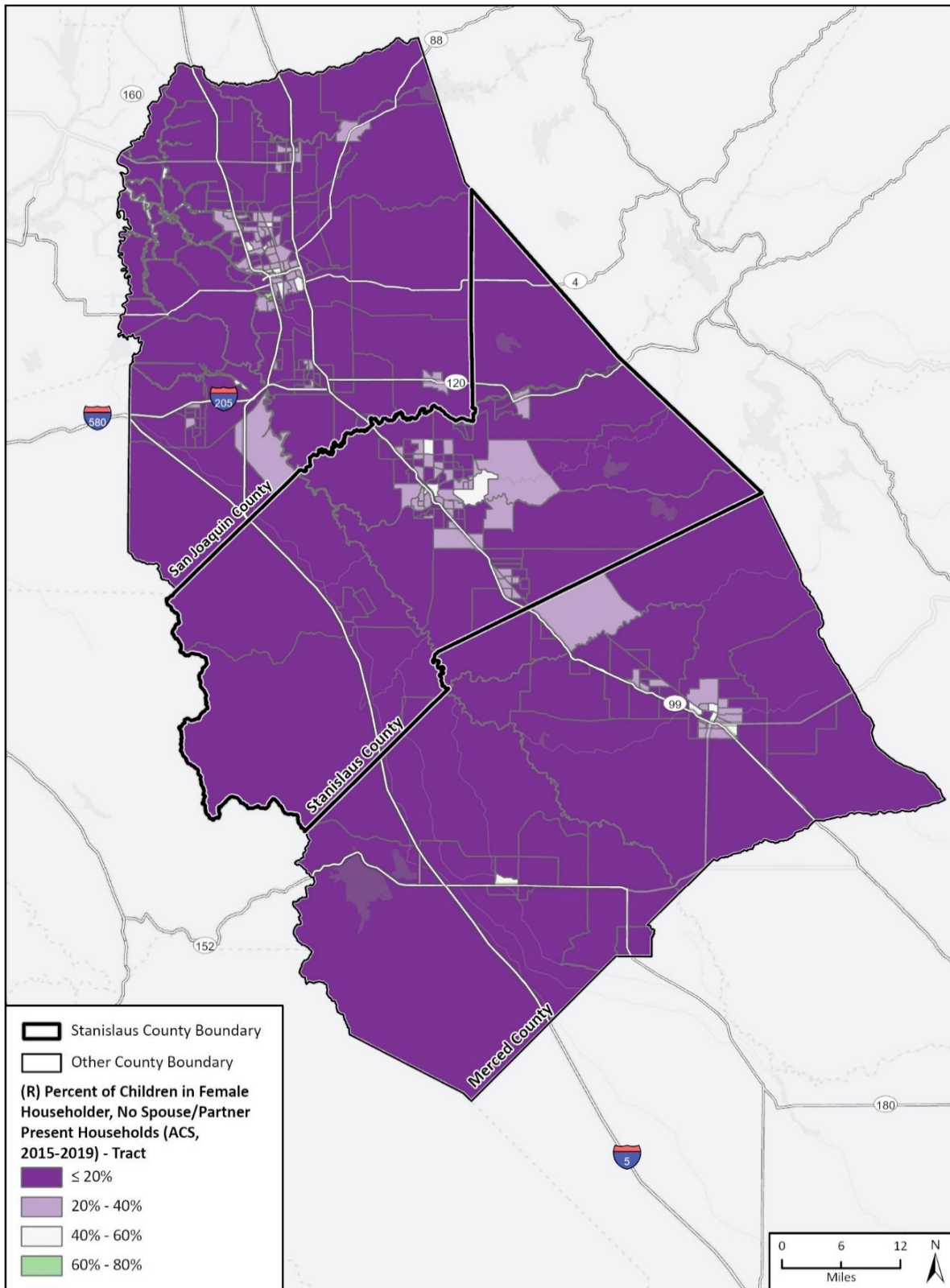
Figure 3-17 Children in Female-Headed Households, No Spouse/Partner Present by Census Tract, Stanislaus County



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

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



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

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3.9 Household Income

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

Local Trends

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

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

Table 3-8 Median Household Income by Census Designated Place

Median Household Income	
Stanislaus County	\$62,873
CDPs	
Airport	\$28,370
Bret Harte*	\$33,250
Bystrom**	\$34,796
Cowan Tract	\$66,082
Crows Landing	\$30,458
Del Rio	\$113,125
Denair	\$83,304
Diablo Grande	\$106,167
East Oakdale	\$123,523
Empire	\$39,727
Grayson	\$62,404
Hickman	\$74,063
Keyes	\$46,250
Knights Ferry	-
La Grange	\$16,875
Monterey Park Tract	-
Orange Blossom	\$68,750
Parklawn*	\$63,764
Riverdale Park Tract*	-
Rouse/Colorado***	\$50,132
Salida	\$82,563
Valley Home	-
Westley	-
West Modesto***	\$43,864

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

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

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

Source: ACS Data 2020 5 year Estimates, Table DP03

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

Table 3-9 Median Income by Household Type

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

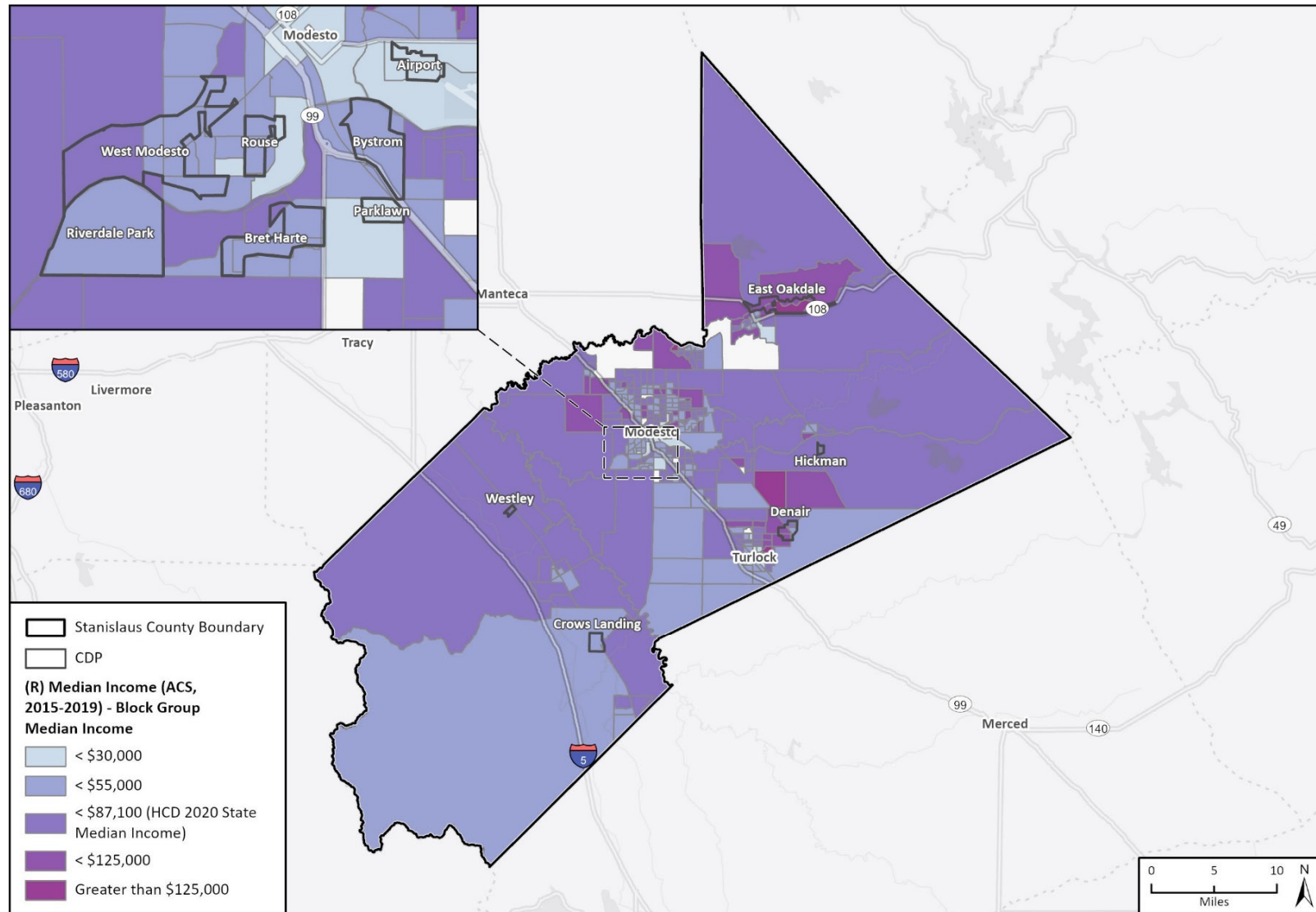
*The U.S. Census defines “family” as a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Source: ACS 5 Year, 2016-2020, S1901

Regional Comparison

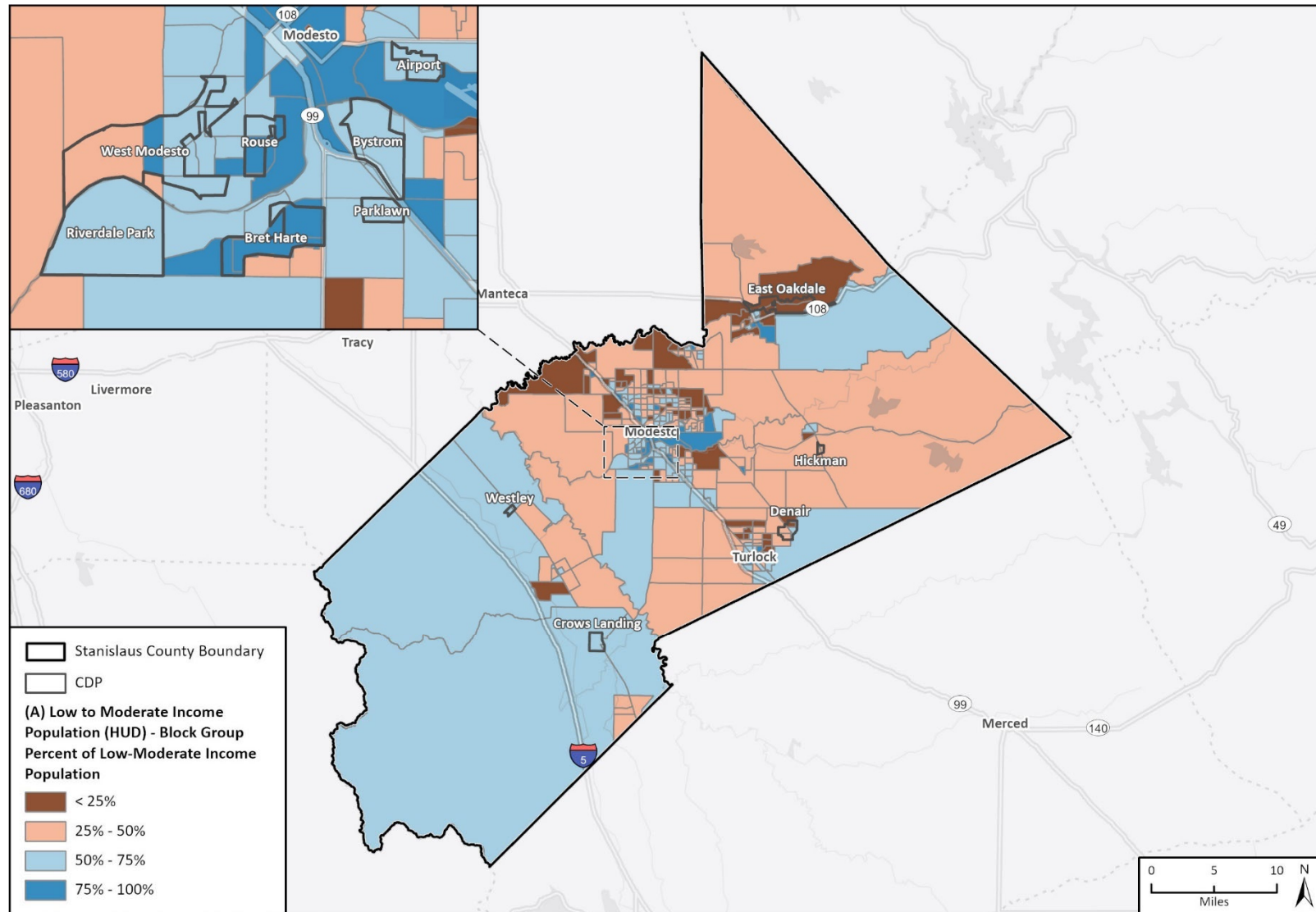
The Northern San Joaquin Valley has a similar pattern of LMI households to Stanislaus County. Within each County, the areas with the highest percentage of LMI income population (between 75 to 100 percent) are located near major cities and along major highways, as Figure 3-21 displays.

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



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

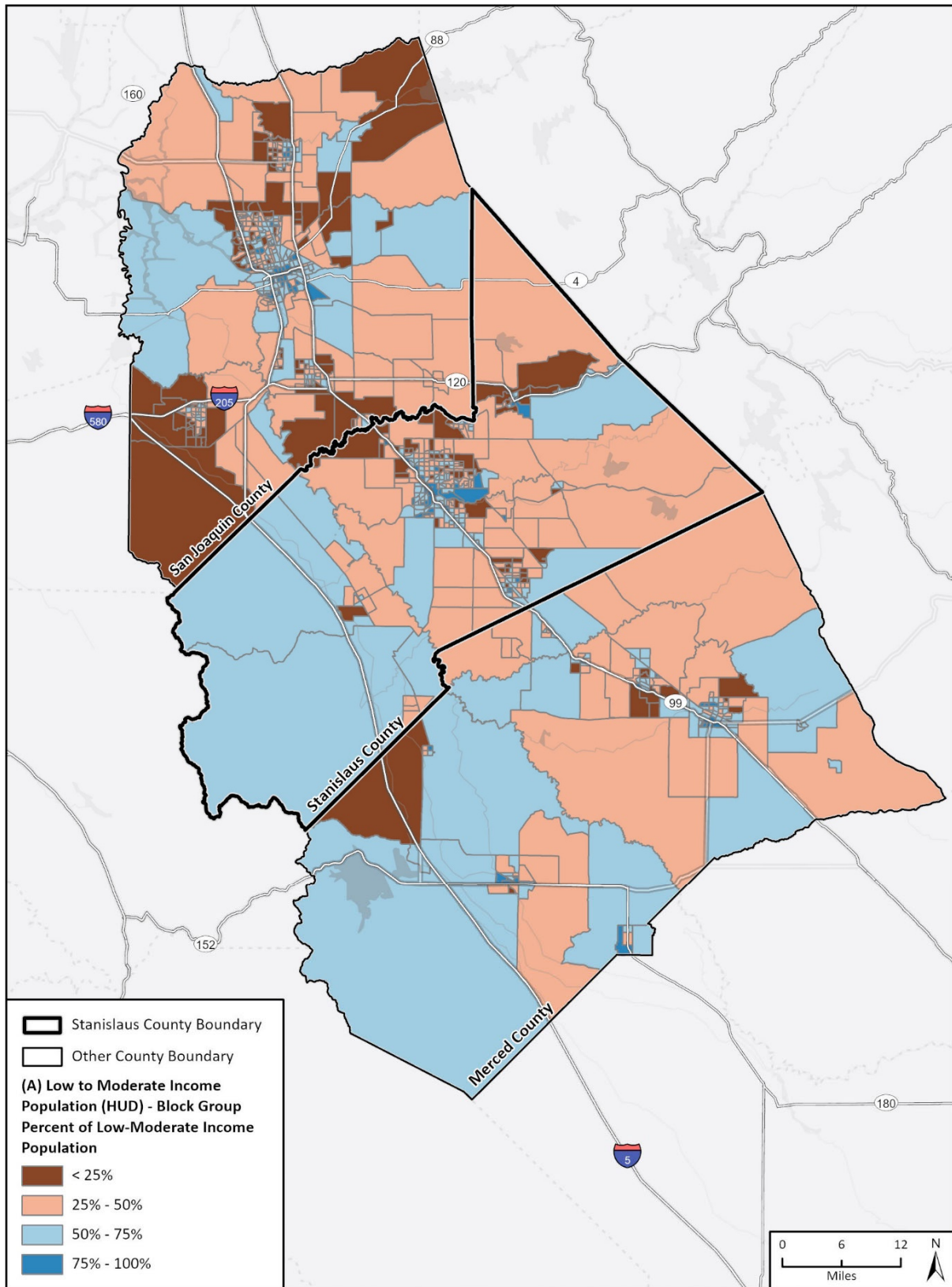
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Figure 3-20 Percent Low to Moderate Income Population by Block Group, Stanislaus County

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

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



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

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3.9.1 Racially and Ethnically Concentrated Areas of Poverty

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

3.9.2 Poverty

Local Trends

According to HUD 2009-2013 data, there are four R/ECAPs in Stanislaus County. Three R/ECAPs overlap with the Airport, Rouse/Colorado, and Bret Harte CDPs (see Figure 3-23), which align with patterns of the population earning an income below the poverty level. The fourth R/ECAP overlaps with the City of Ceres. Three of the four R/ECAPs in the County consist of unincorporated islands substantially surrounded by the City of Modesto. These census tracts are predominantly Hispanic/Latino, with more than 81 percent of residents identifying as non-white. According to public feedback, these areas have experienced a consistent lack of public investment, such as sewer connections, stormwater improvements, sidewalks, and street lighting.

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

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

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

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

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

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

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

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

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

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

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

Table 3-10 Income and Poverty

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

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

Table 3-11 Poverty by Female-Headed Households

	Unincorporated Stanislaus County		Stanislaus County		California	
	Number	Percent	Number	Percent	Number	Percent
Below Poverty Line	3,500	13.1%	13,534	10.4%	364,236	21.5%
Above Poverty Line	23,238	86.8%	116,523	89.6%	1,329,038	78.5%
Total	26,771		130,057		1,693,274	
Source: U.S. Census Bureau, ACS 2016-2020 (5-year Estimates), Table B17010						

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

Table 3-12 Poverty Rate by Census Designated Place

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

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

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

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

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

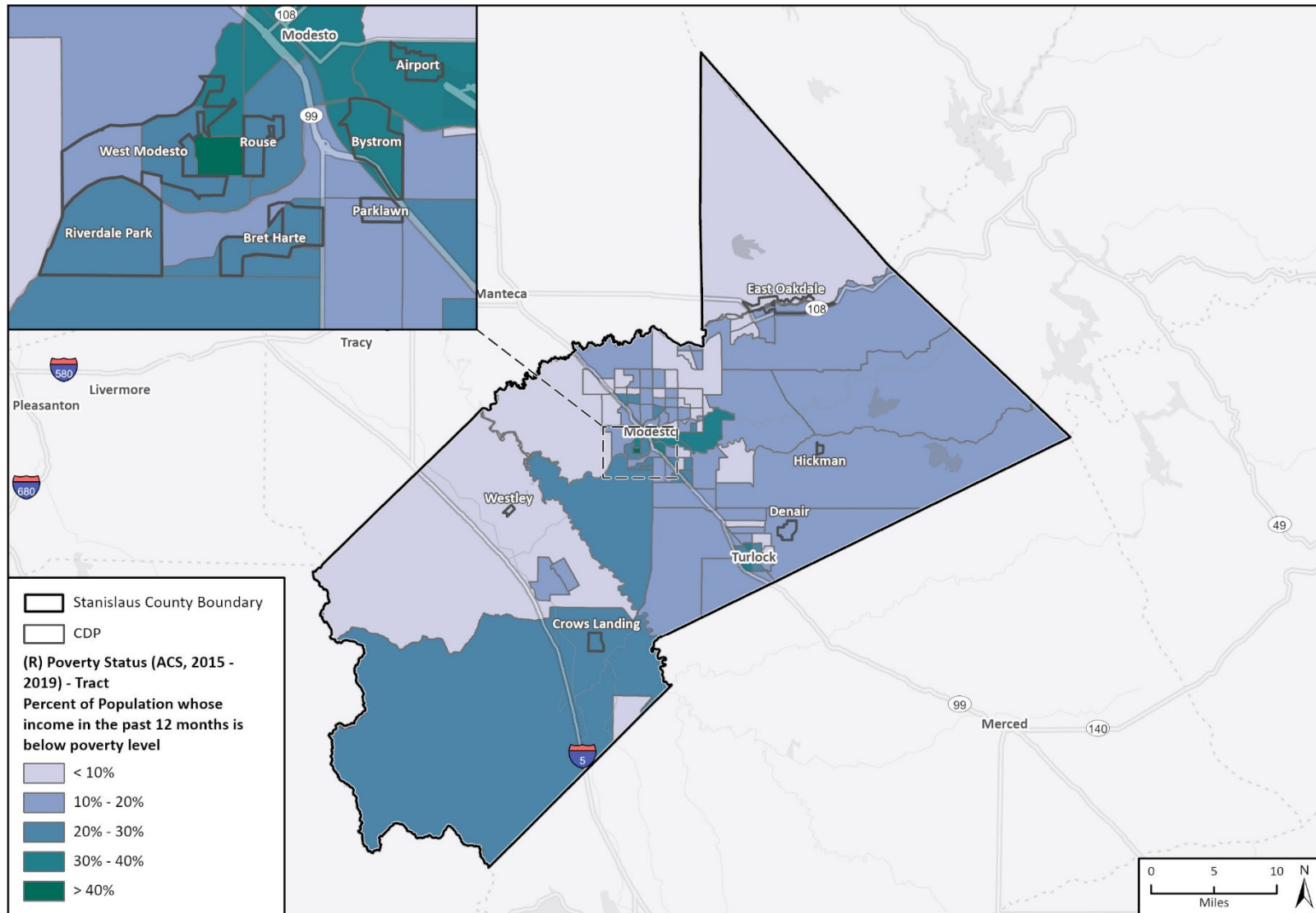
Source: ACS Data 2020 5 year Estimates, Table S1701

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

Regional Comparison

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

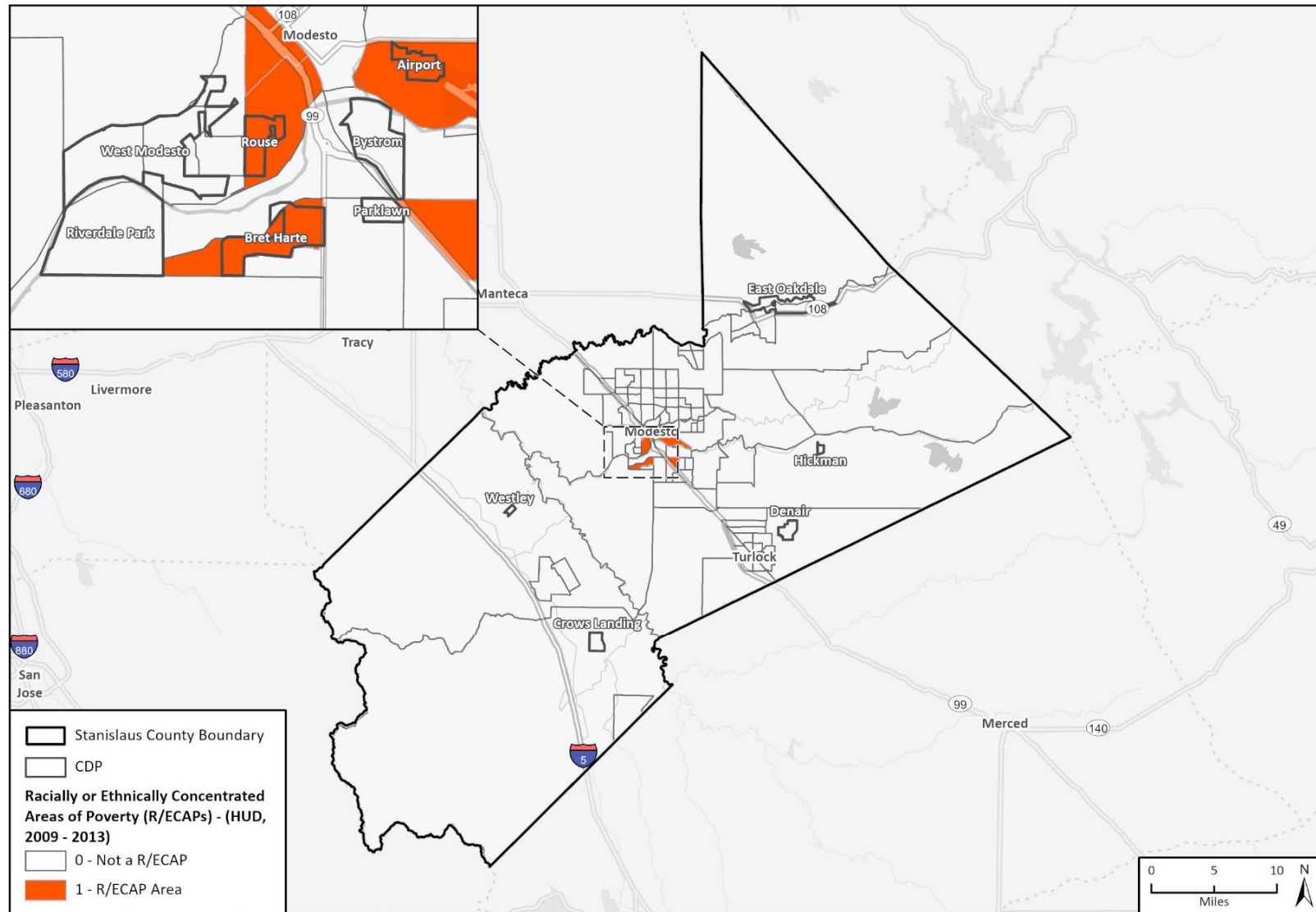
Figure 3-22 Poverty Status by Tract, Stanislaus County



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

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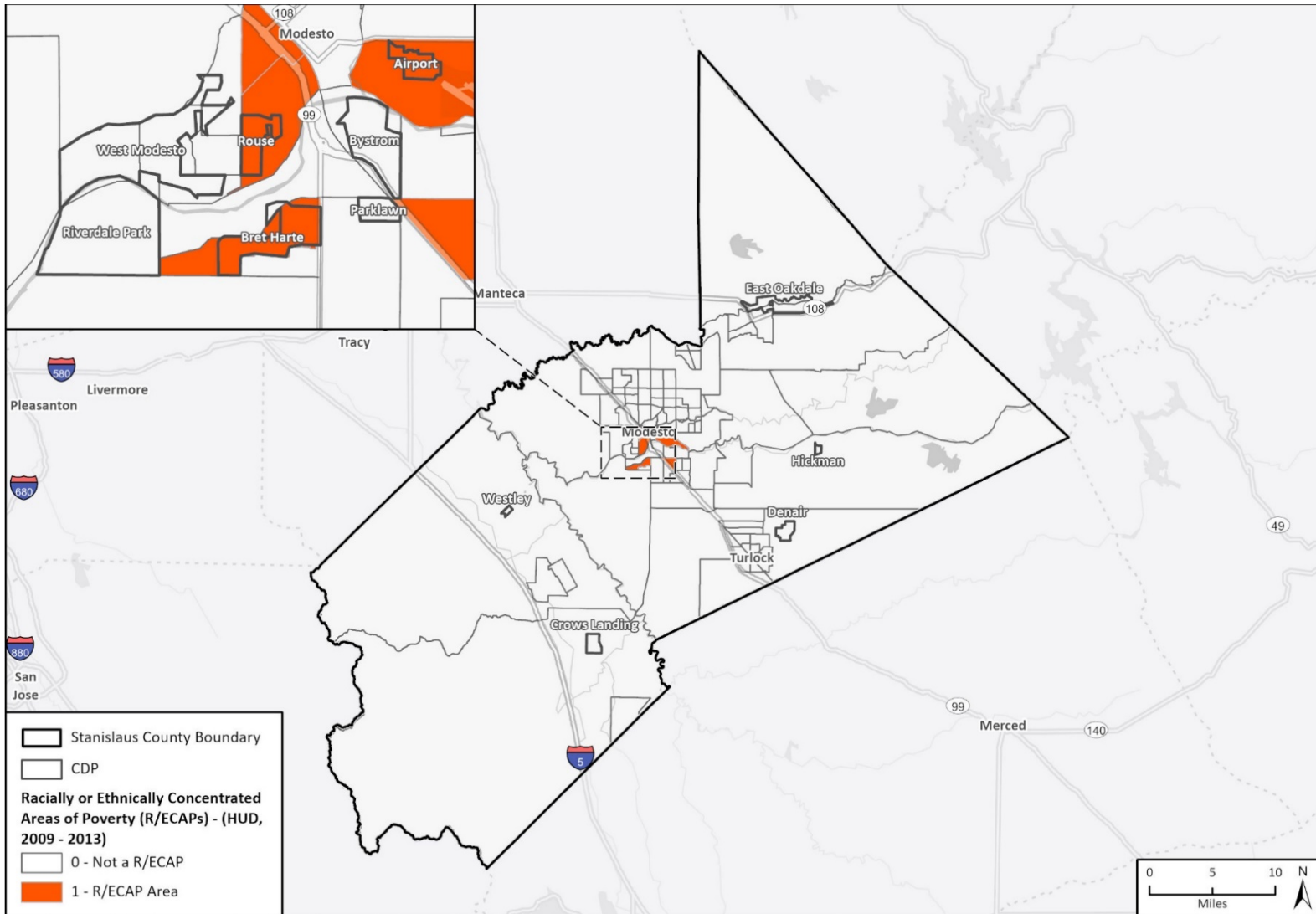
Figure 3-23 R/ECAPs in Stanislaus County



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

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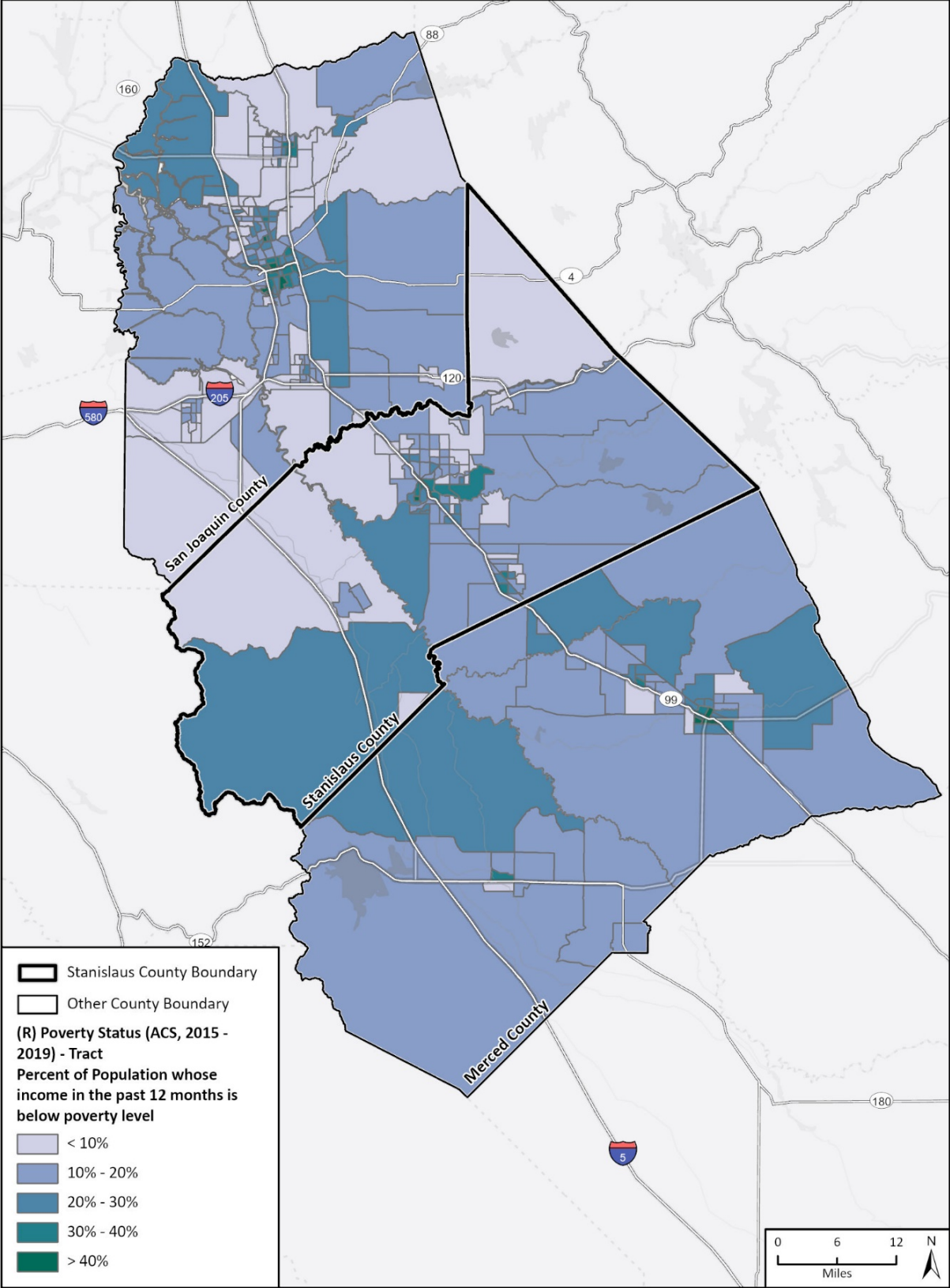
Figure 3-24 Areas of High Segregation and Poverty in Stanislaus County



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

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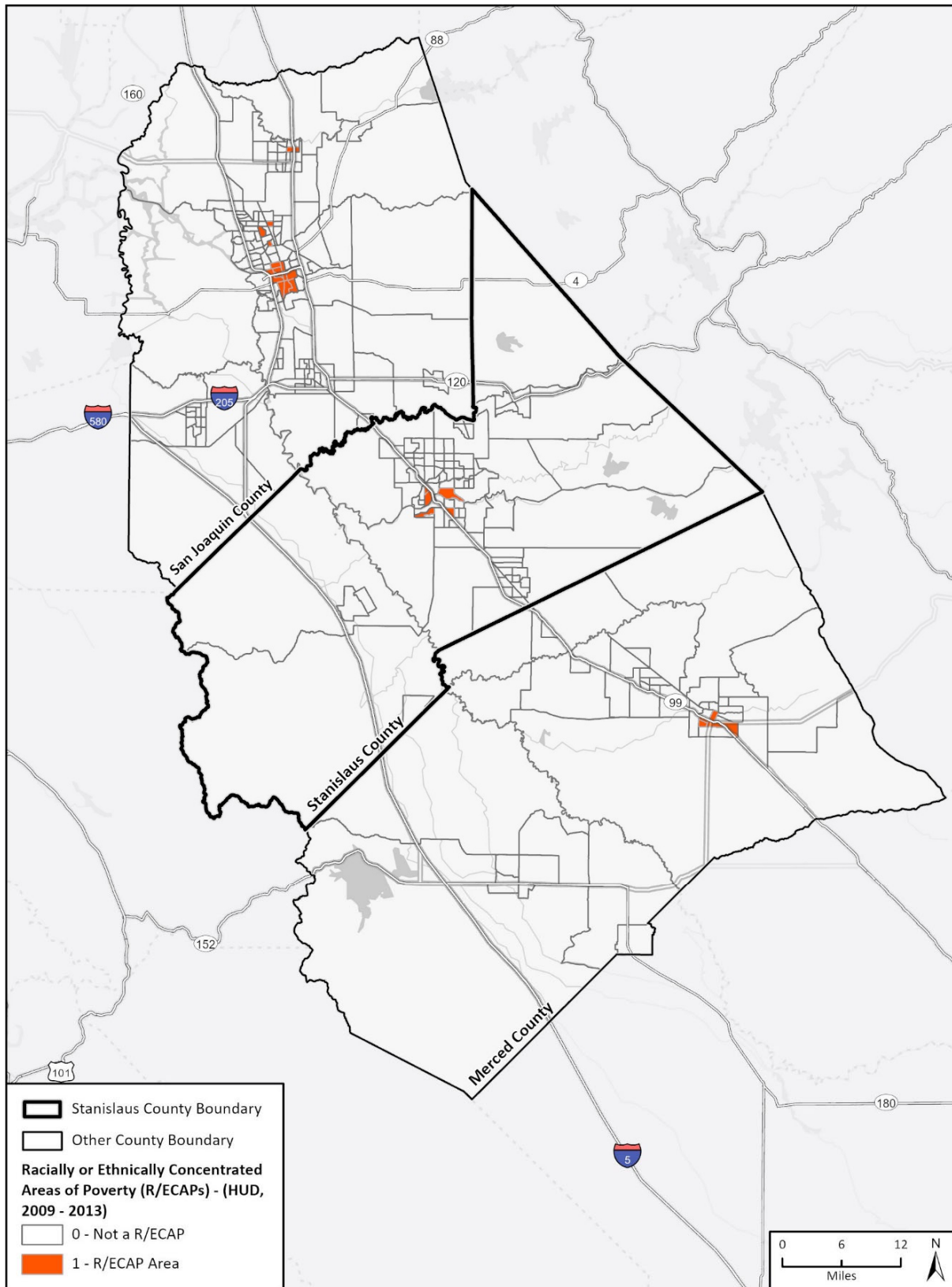
Figure 3-25 Poverty Status by Census Tract, Region



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

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Figure 3-26 R/ECAPs, Region



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

3.9.3 Concentrated Areas of Affluence

While R/ECAPs have been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated and promotes equitable access to opportunity, a key to fair housing choice. HCD defines an RCAA as a census tract in which 80 percent or more of the population is white and has a median income of at least \$125,000.¹⁵

Local Trends

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

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

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

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

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

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

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

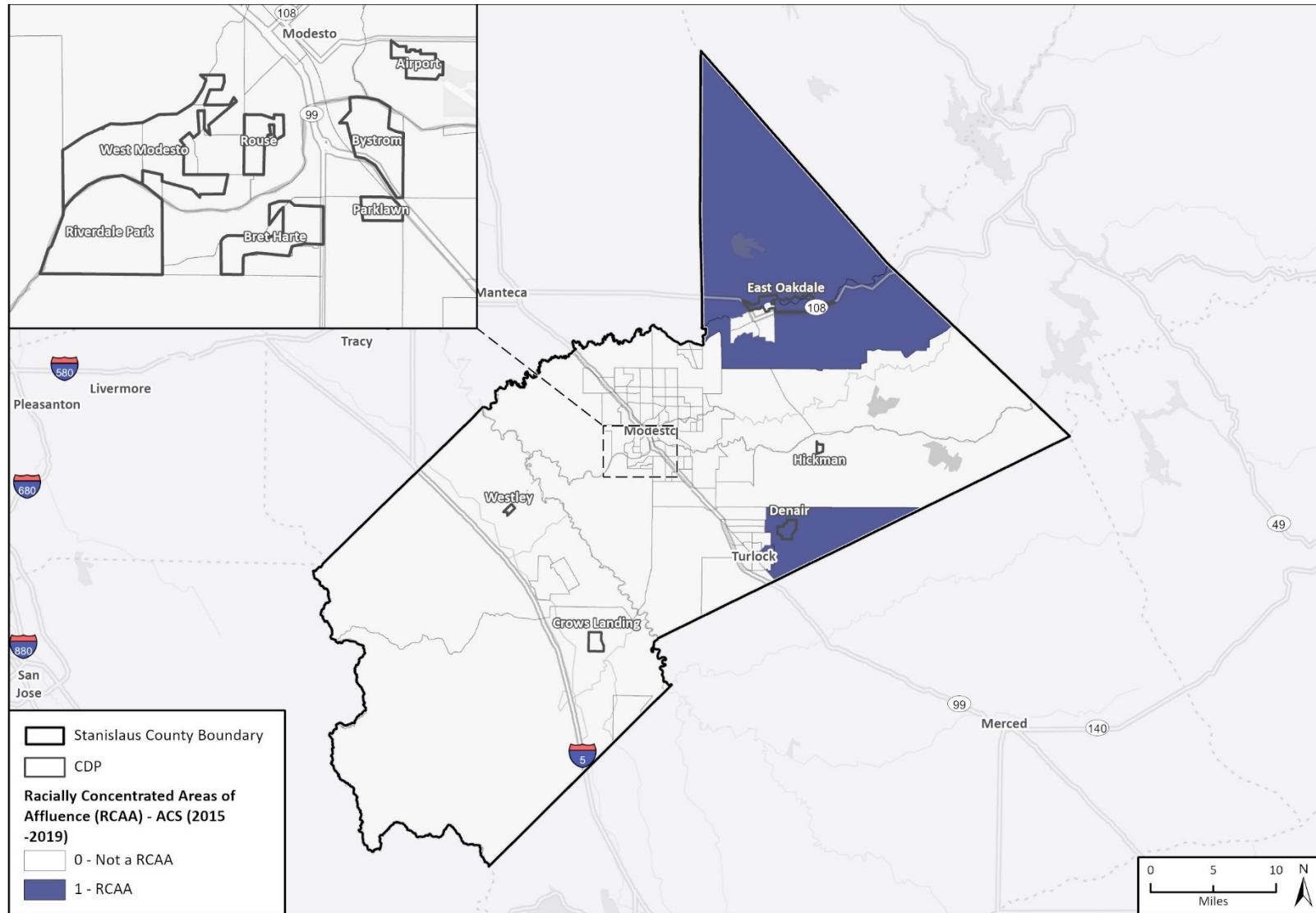
Developed areas within the RCAAs consist of rural residential unincorporated communities that are primarily developed with single-family residential uses. Development in the Valley Home/Orange Blossom/Knights Ferry RCAA is clustered in the CDPs of Valley Home, Orange Blossom, Knights Ferry, and part of East Oakdale which are primarily zoned Rural Residential, Historical, and Agriculture with a minimum parcel size ranging from three to 10 acres. These zones allow for two dwelling units per parcel when over one-acre in size or when at least 20,000 square-feet in size when connected to at least one public water or sewer service. These CDPs lack public sewer and mostly lack public water and are primarily developed with single-family residential uses on large lots ranging from 1 to 20 acres. Similarly, the East Oakdale RCAA contains the southern portion of East Oakdale and a small portion of the city of Oakdale used for agricultural uses. The southern part of East Oakdale is zoned Rural Residential and the remaining areas are zoned Agriculture with a minimum lot size of 10 or 40 acres. Allowed density in the East Oakdale RCAA ranges from two dwelling units per 40 acres to one dwelling unit per 0.46 acres. Development within this RCAA primarily consists of single-family residences on 0.46 acre lots within the most concentrated areas of East Oakdale and single-family residences on larger lots (3 to 20 acres) in the outer areas of East Oakdale. Rural areas of the Denair RCAA are zoned Agriculture with a minimum lot size of 40 acres and areas within the CDP of Denair are primarily zoned Rural Residential, Planned Development, Single-Family Residential, Multiple Family Residential, General Commercial and Industrial. Denair is mostly developed with newer single-family residential uses on 7,000 to 12,000 square foot lots.

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

Regional Comparison

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

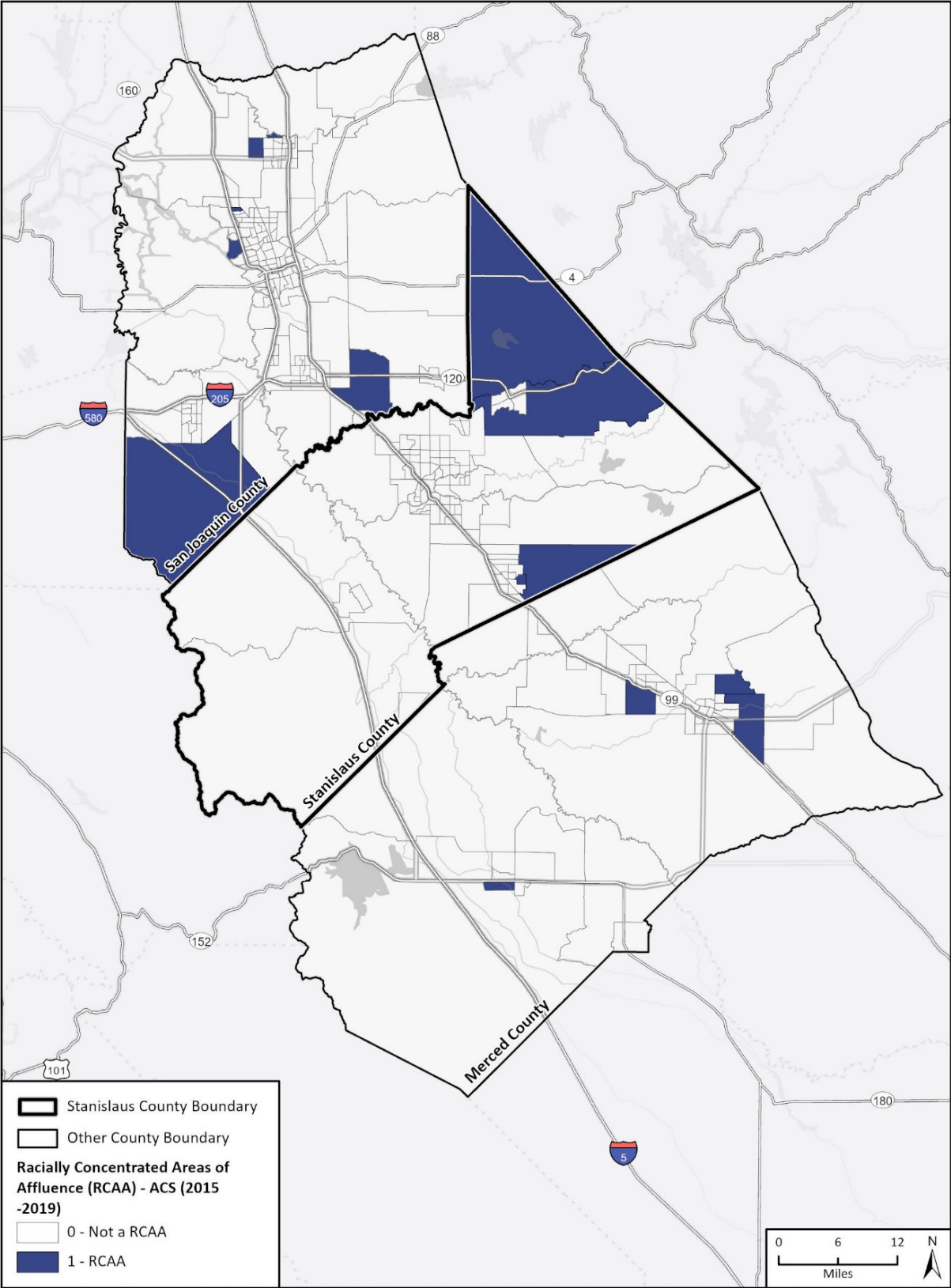
Figure 3-27 Racially Concentrated Areas of Affluence, Stanislaus County



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

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Figure 3-28 Racially Concentrated Areas of Affluence, Region



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

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3.10 Location of Affordable Housing

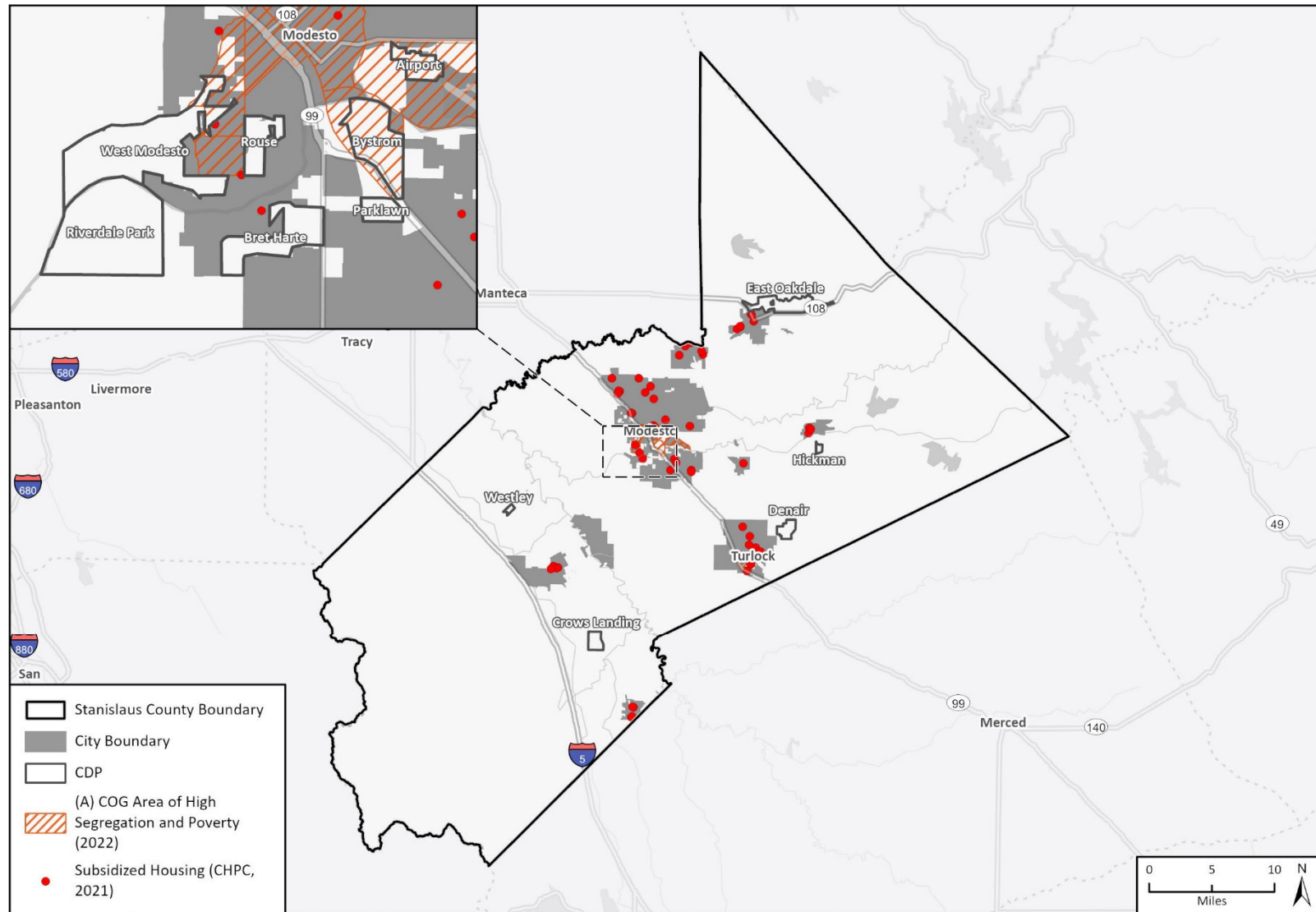
The geographic distribution of publicly supported housing is an important factor in examining fair housing choice and segregation by income and race/ethnicity. Figure 3-29 shows the location of publicly supported affordable housing in Stanislaus County relative to racial/ethnic composition. The diagram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

Local Trends

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

Regional Comparison

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

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

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

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3.11 Disparities in Access to Opportunities

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

3.11.1 HCD/TCAC Opportunity Areas

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

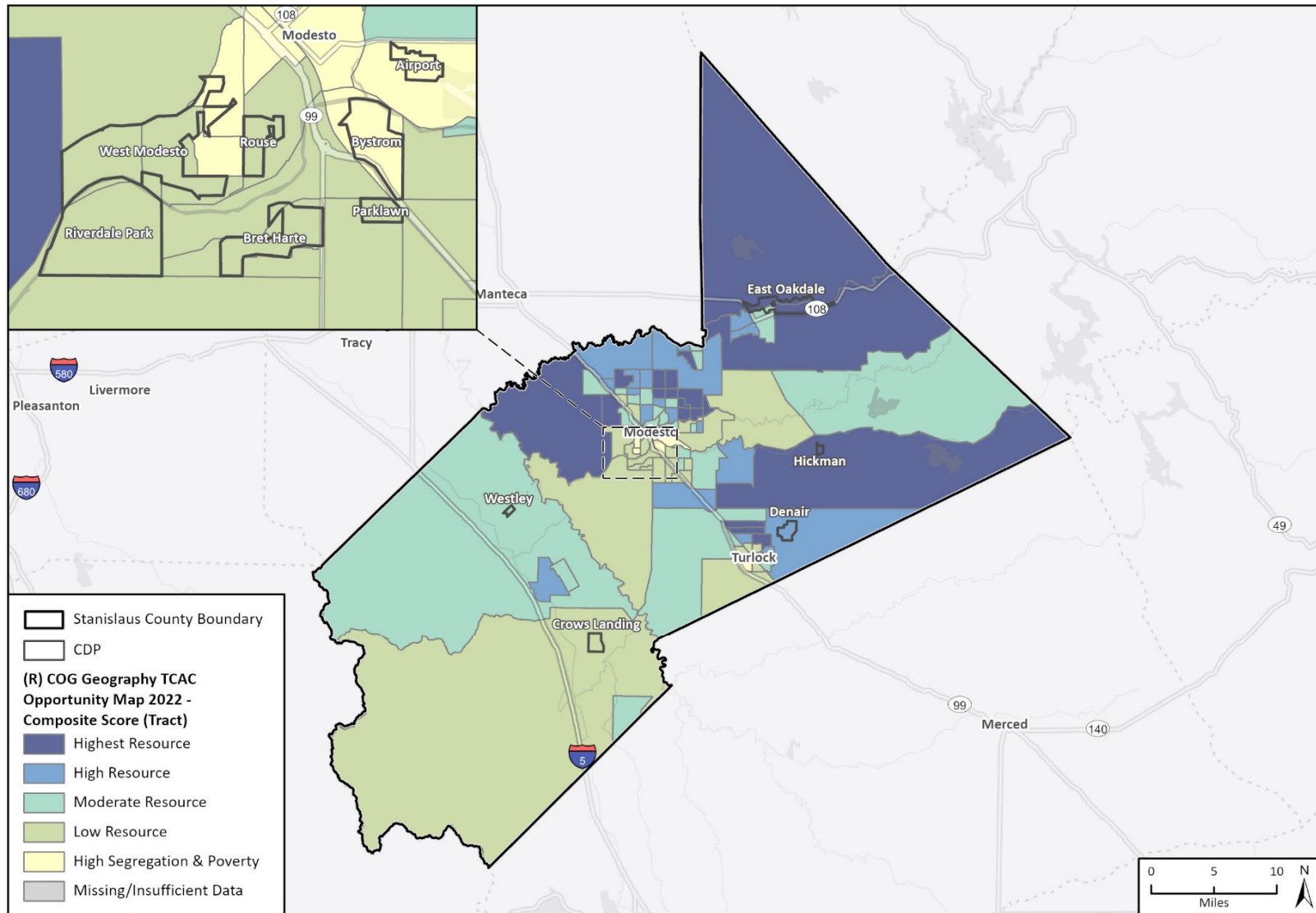
Local Trends

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

Regional Comparison

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

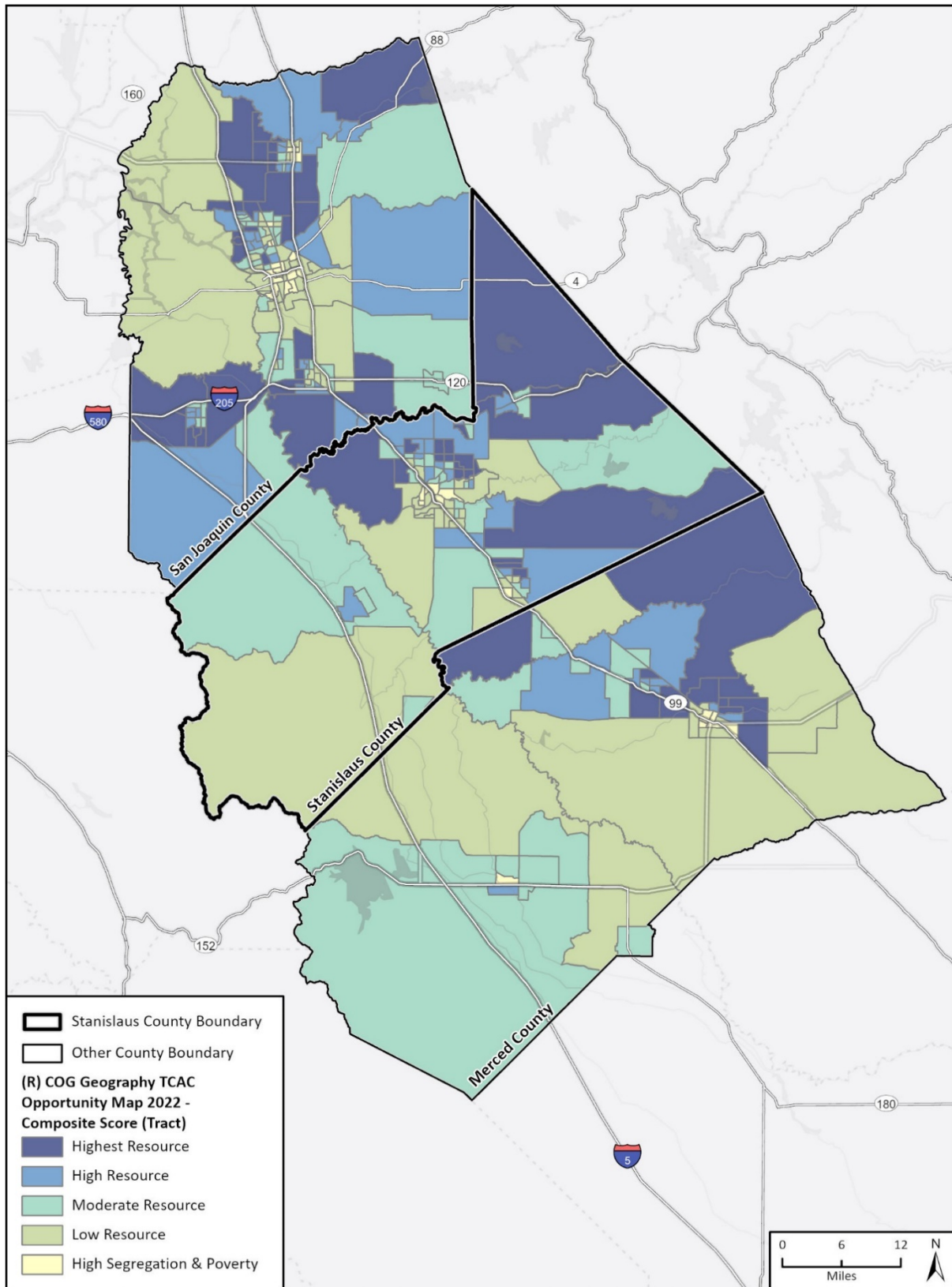
Figure 3-30 HCD/TCAC Opportunity Areas by Census Tract, Stanislaus County



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

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Figure 3-31 HCD/TCAC Opportunity Areas, Region



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

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3.11.2 Opportunity Areas by Indicator

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

Economic Opportunity and Jobs Proximity Index

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

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

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

Local Trends

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

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

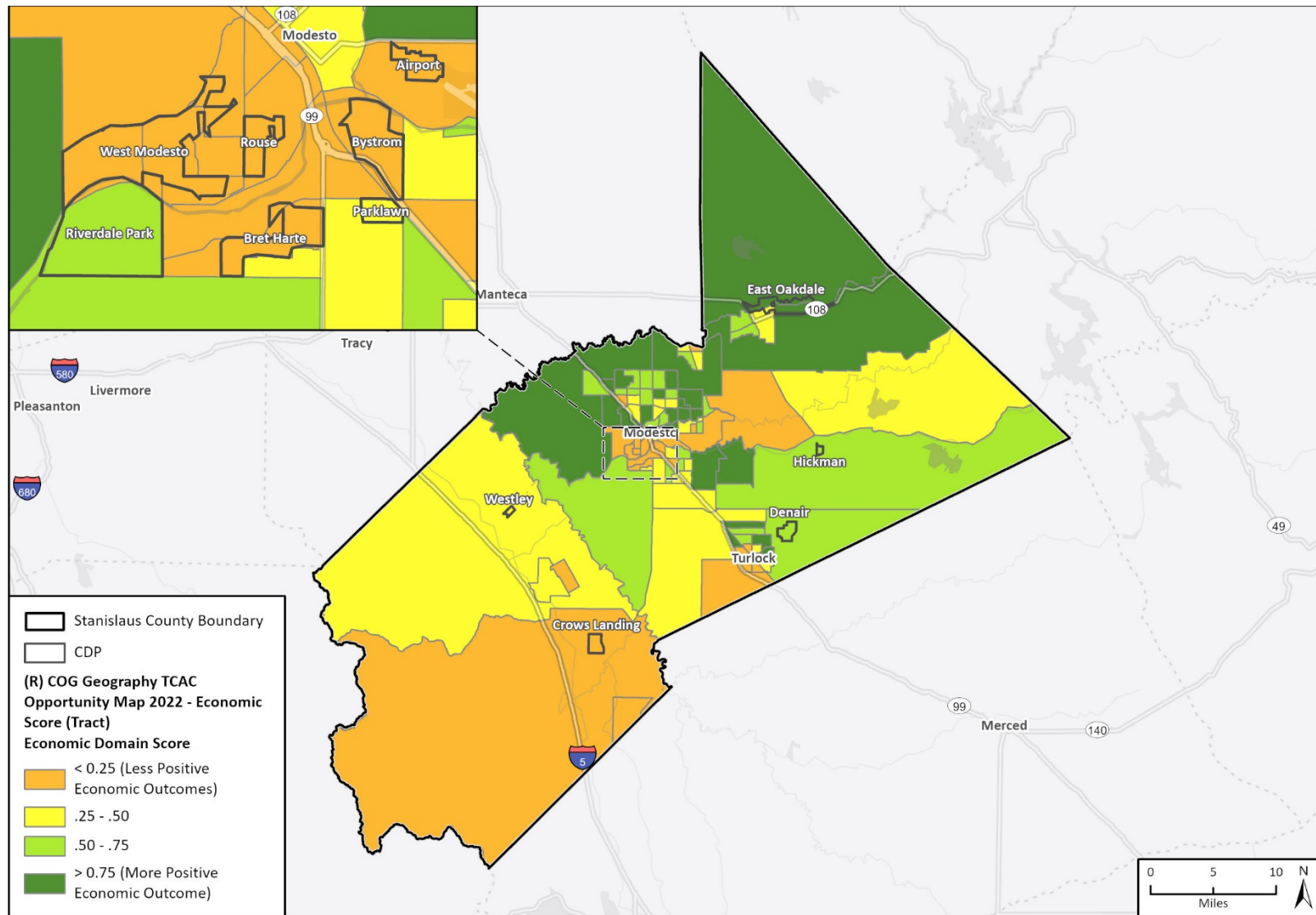
Parts of Stanislaus County with the highest job proximity index, meaning there is high access to jobs, are in the City of Modesto and in the western part of the County. As shown in Figure 3-33, much of the County received the middle range (40 to 60) of possible scores for HUD's jobs proximity index,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

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

Regional Comparison

In comparison the Northern San Joaquin Valley, Stanislaus County has a similar distribution in economic opportunity scores and job proximity index. Throughout the region, it appears that the more positive economic scores are in areas surrounding major cities in primarily agriculture zones. Areas with a less positive economic outcome are found within major cities and away from agriculture, as seen in Figure 3-34. This could be attributed to the key role and value that agriculture plays throughout the region. In comparison, a concentration of higher job proximity index scores (score of 80 or higher) is seen within major cities throughout the region, as Figure 3-35 shows. Like Stanislaus County, rural areas of the region have a higher job proximity score than the established cities within the region. This distribution could be credited to the distance rural residents must travel to job centers found in major cities and in agriculture.

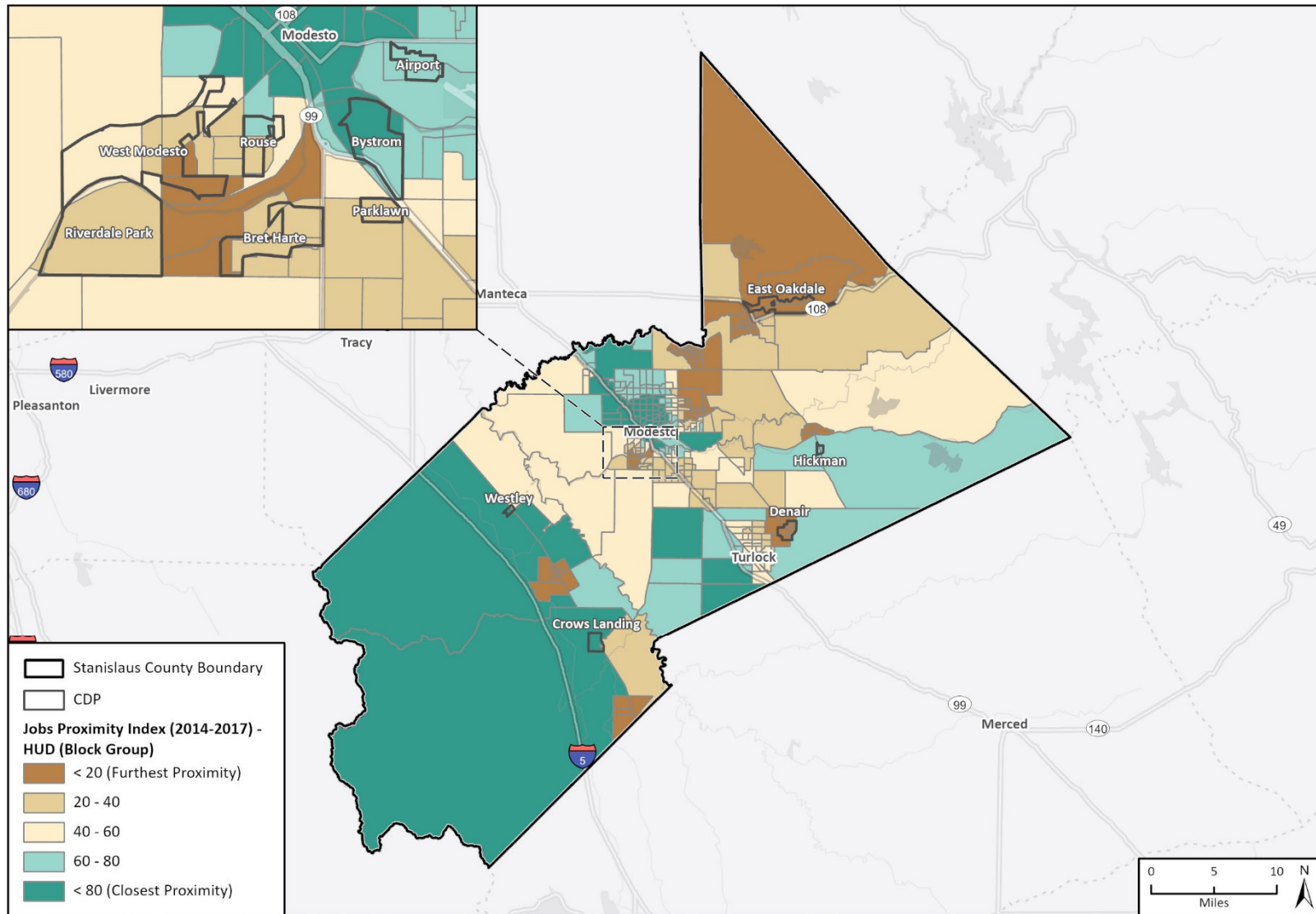
Figure 3-32 TCAC Opportunity Areas – Economic, Stanislaus County



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

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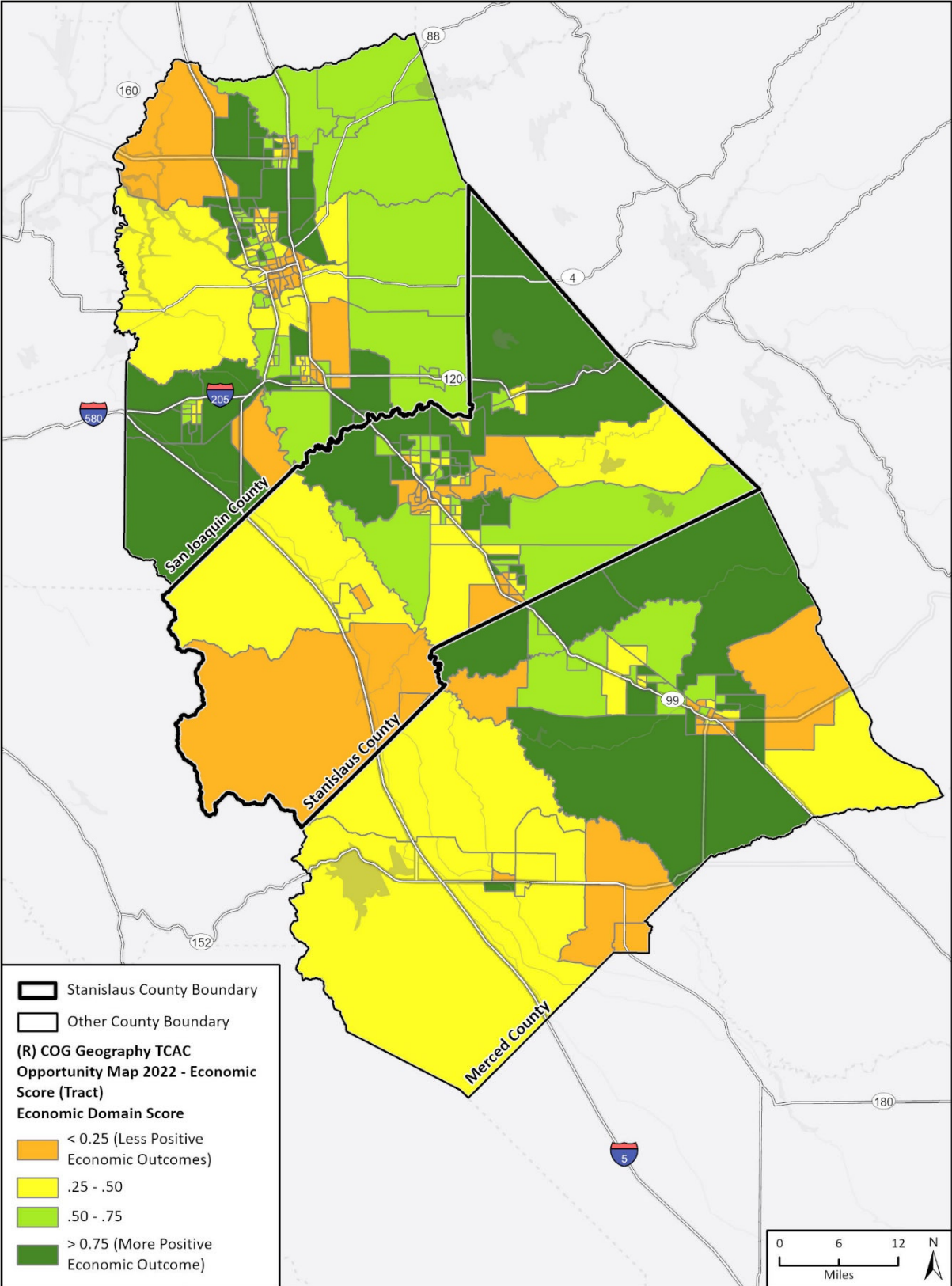
Figure 3-33 Jobs Proximity Index by Block Group, Stanislaus County



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

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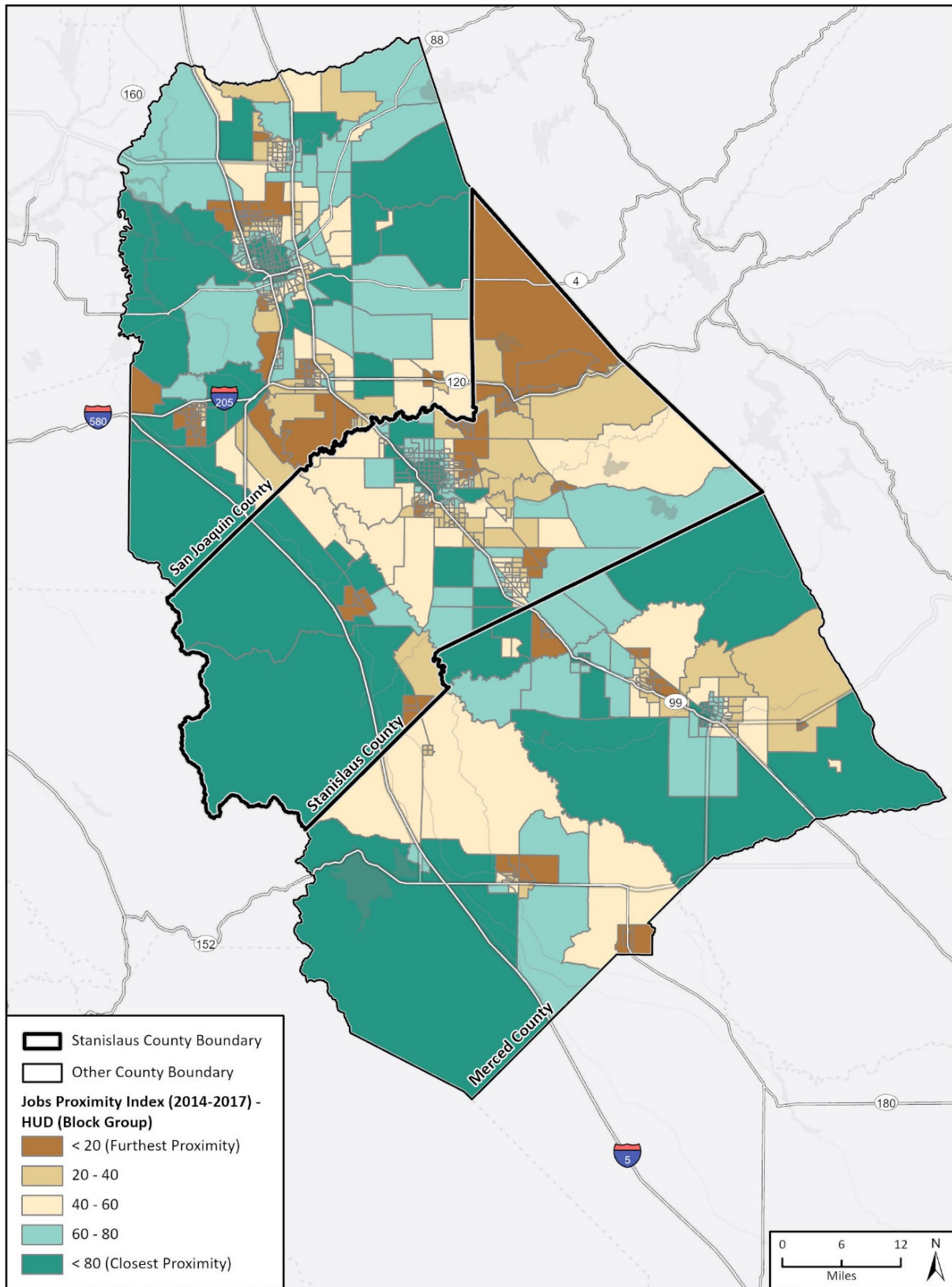
Figure 3-34 TCAC Opportunity Areas – Economic Score by Census Tract, Region



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

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Figure 3-35 Jobs Proximity Index, Region



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

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Educational Opportunity

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

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

Local Trends

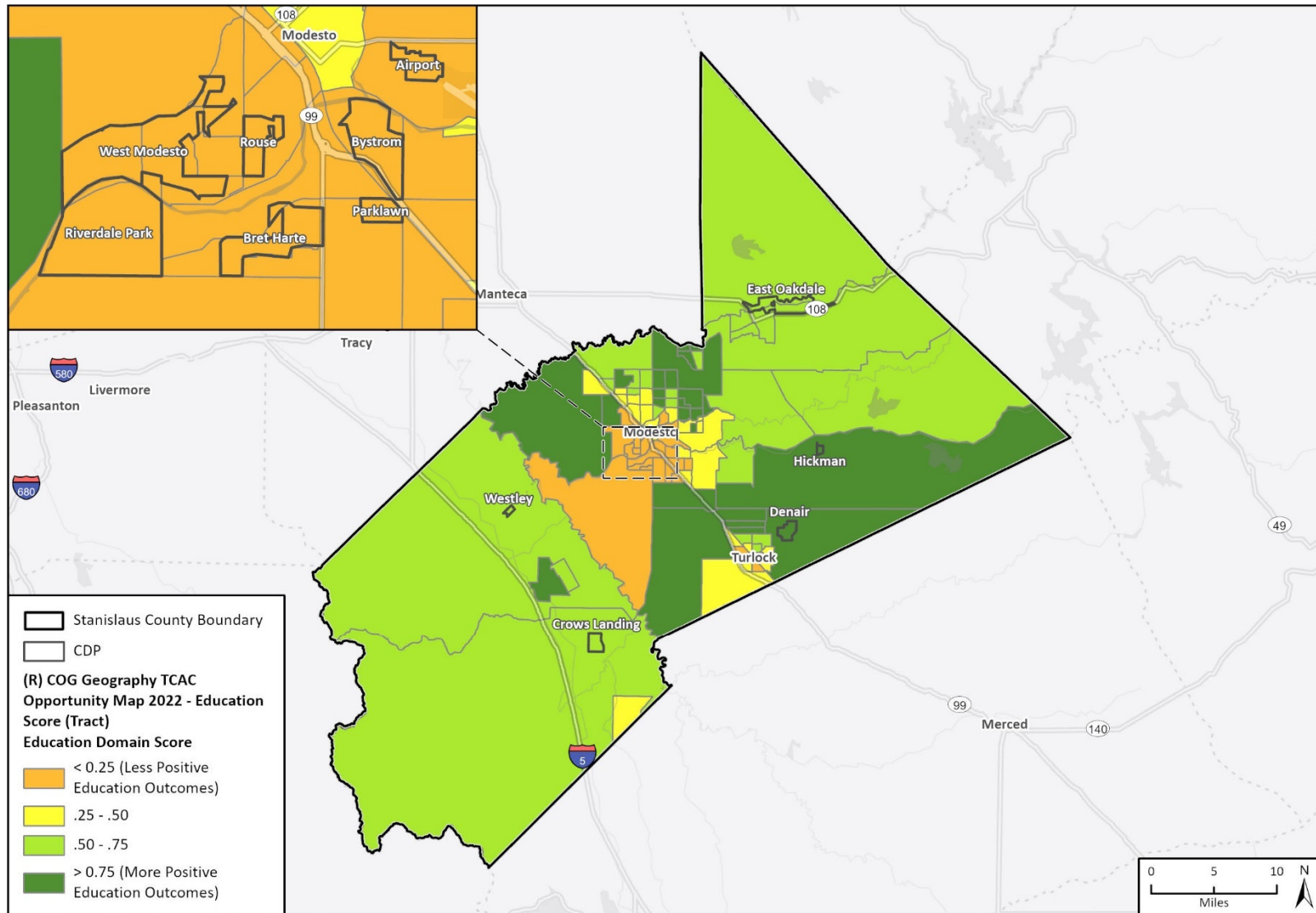
Stanislaus County has significant areas of contrast regarding access to educational opportunities, making this an impediment to fair housing. Areas of the County with more positive educational outcomes are concentrated in rural areas, including western, northern, and eastern parts of the County, while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

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

Regional Comparison

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

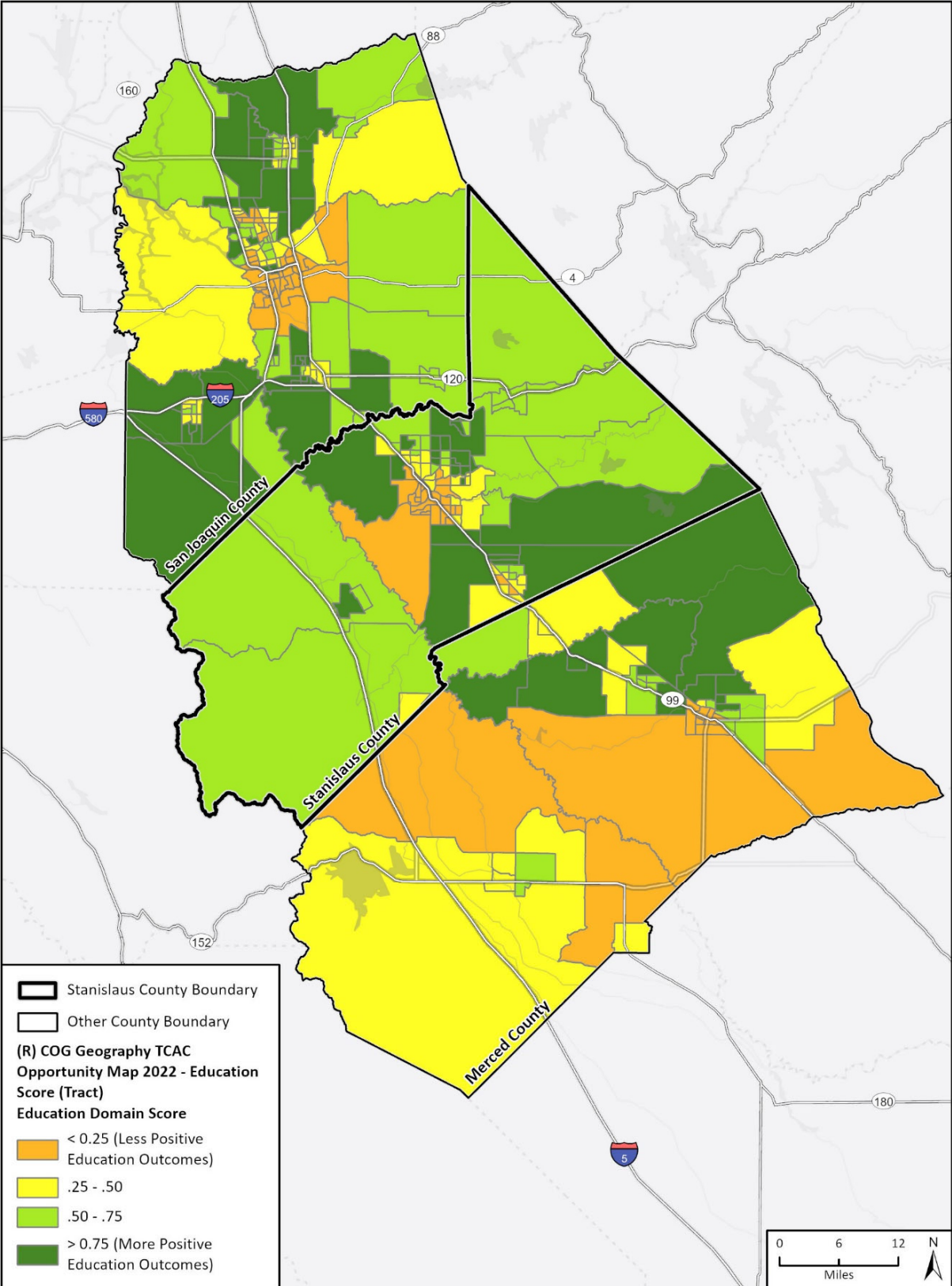
Figure 3-36 TCAC Opportunity Area – Education Score, Stanislaus County



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

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



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

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Healthy Environment

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

Local Trends

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

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

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

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

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

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

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

DUCs identified by the County, per SB 244 requirements codified in Ca Government Code Section 65302.10, requires the County to evaluate unincorporated communities located outside of a sphere of influence of a city. These areas are generally consistent with SB 535 disadvantaged communities as they are predominantly located on the eastern half of the County, east of Highway 99. However, the County considers Westly and Keyes as disadvantaged communities, which are not SB 535 disadvantaged communities. According to the County's Unincorporated Communities Report, DUCs in Stanislaus County generally have lower access to public services and transit, fewer public improvements such as street improvements and storm drainage systems, higher crime rates, lower median household incomes, and higher rates of chronic health conditions caused by air quality and prevalence of fast food compared to other areas of the County. In addition, residents of the DUCs have higher rates of obesity and asthma and lower life expectancy at birth compared to the national, state, and County averages¹⁶.

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

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

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

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

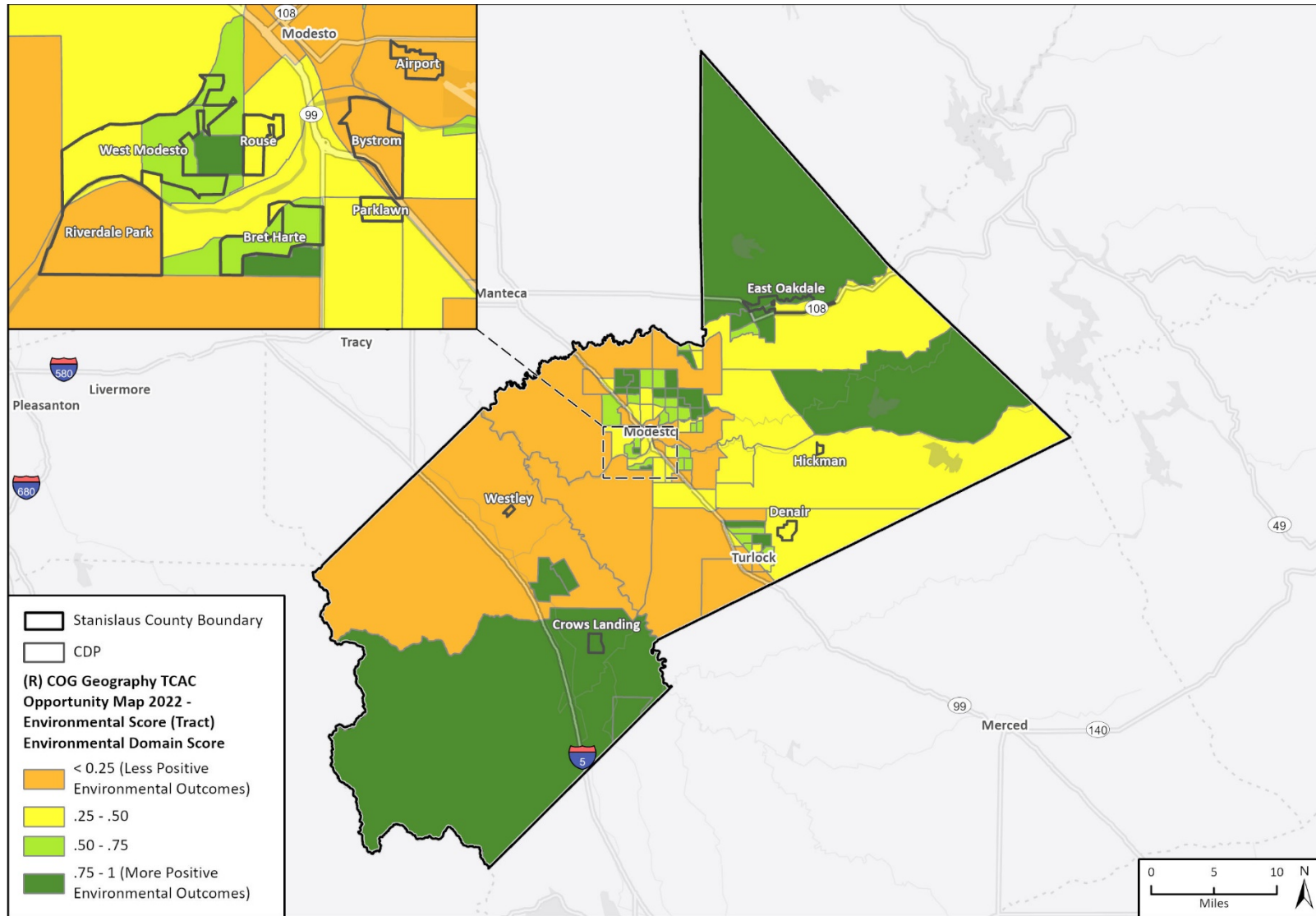
The Westley CSD currently meets the needs of its customers; however, major repairs to the water system will be necessary in the near future and the wastewater treatment plant is operating at capacity. Obtaining funding to address infrastructure improvements is a challenge. There are no public parks in Westley and the nearest parks are approximately two miles east of the community, in Grayson.

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

Regional Comparison

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

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



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

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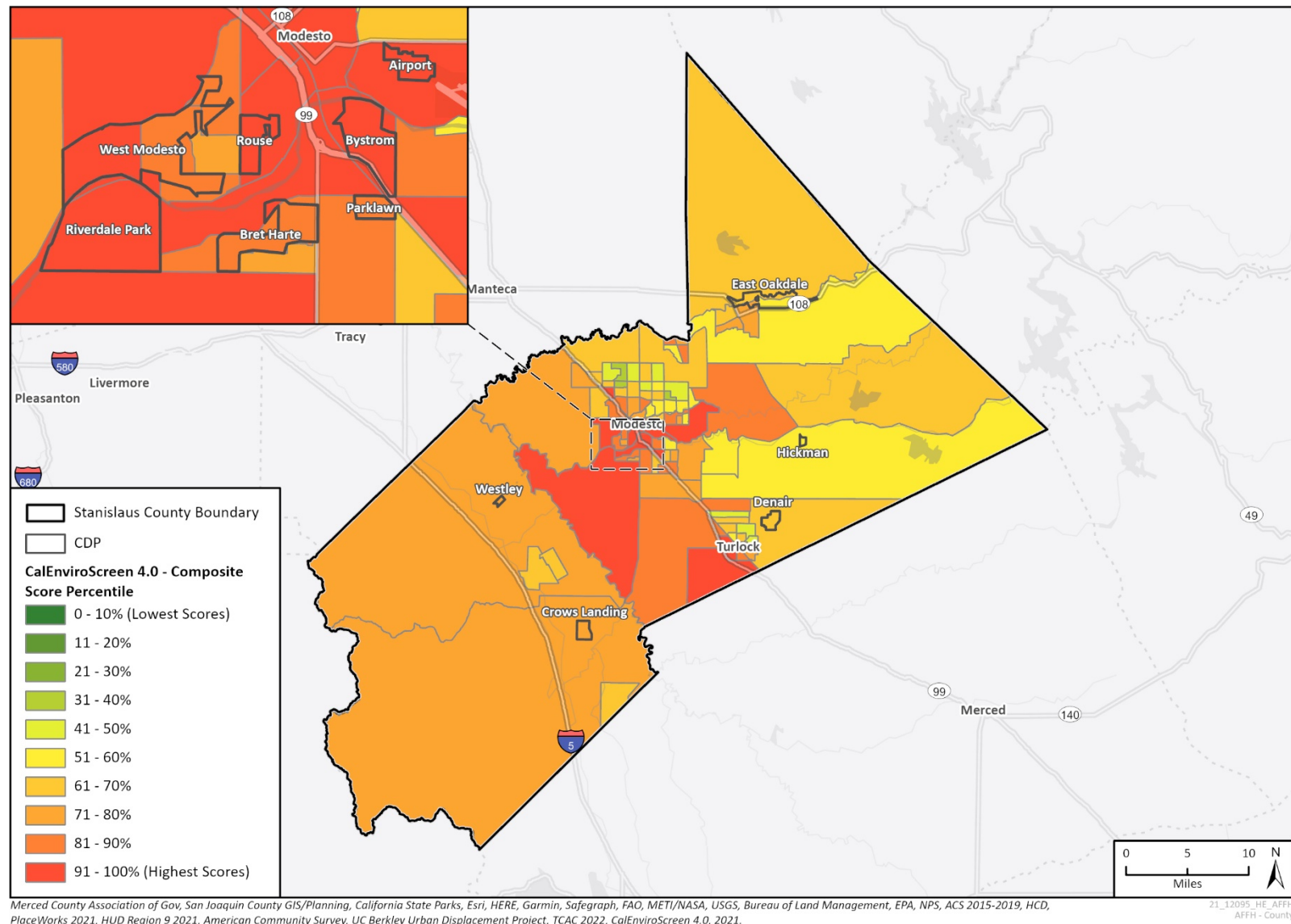
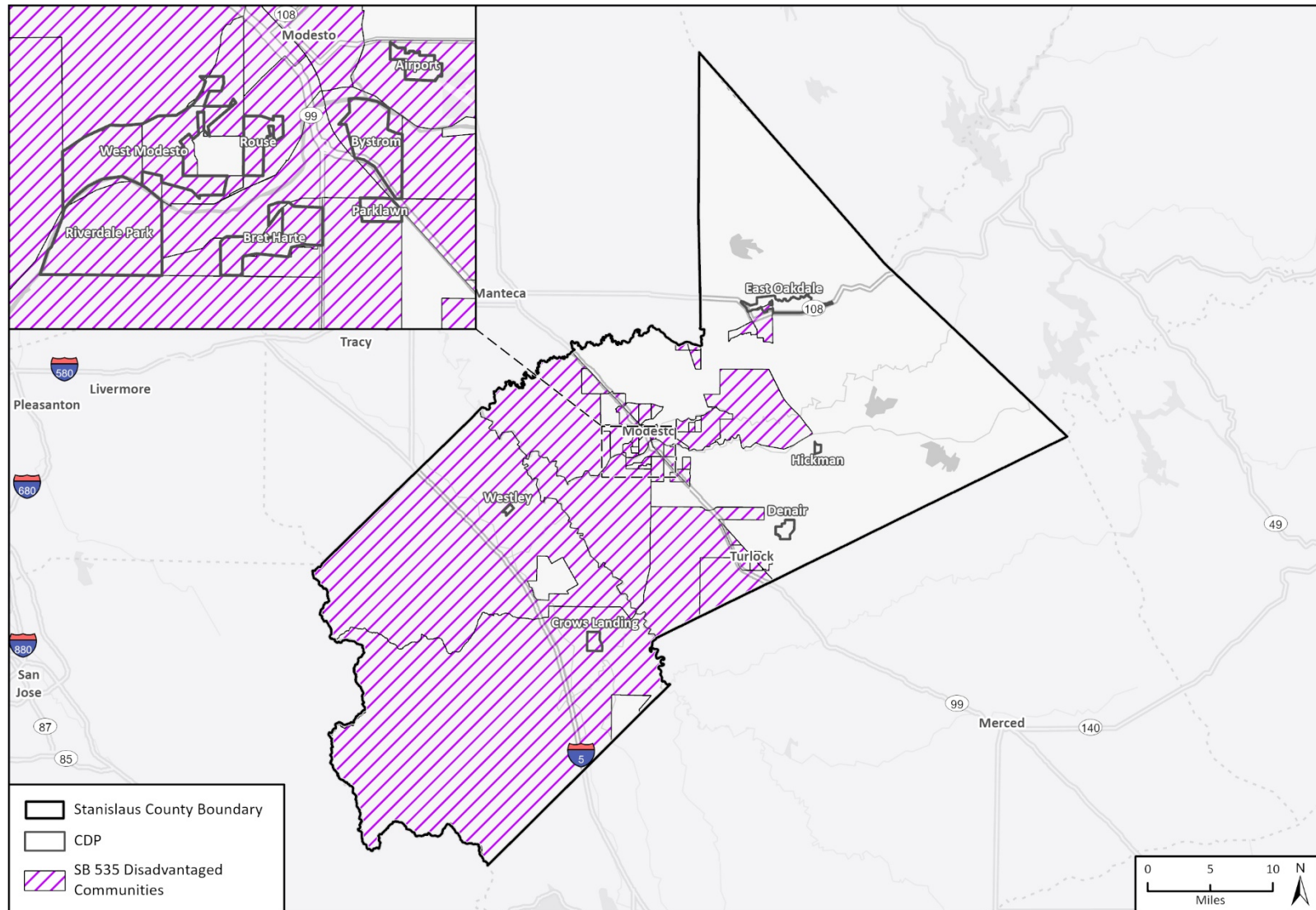
Figure 3-39 CalEnviroScreen 4.0 Percentile Scores, Stanislaus County

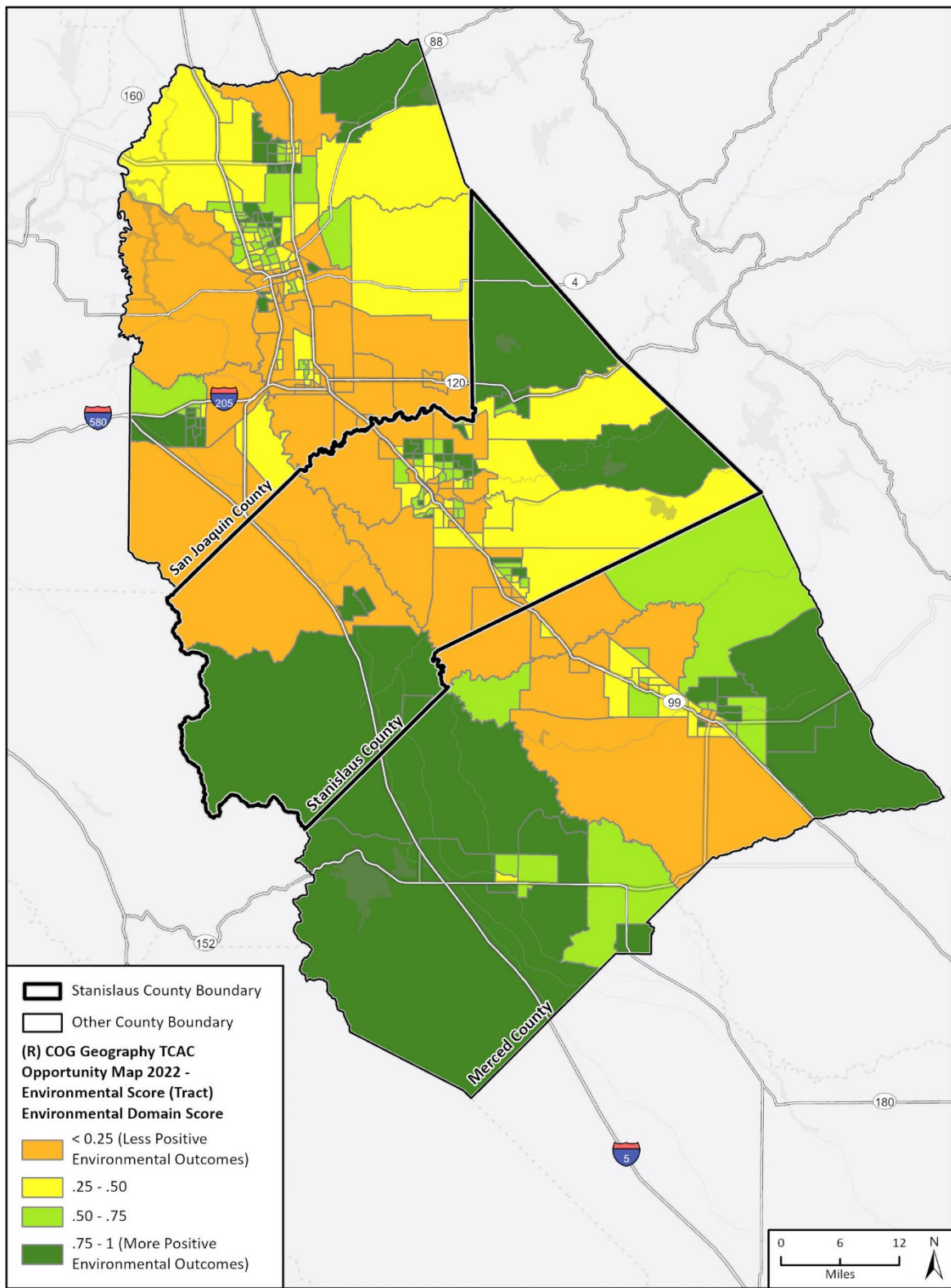
Figure 3-40 SB 535 Disadvantaged Communities, Stanislaus County



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

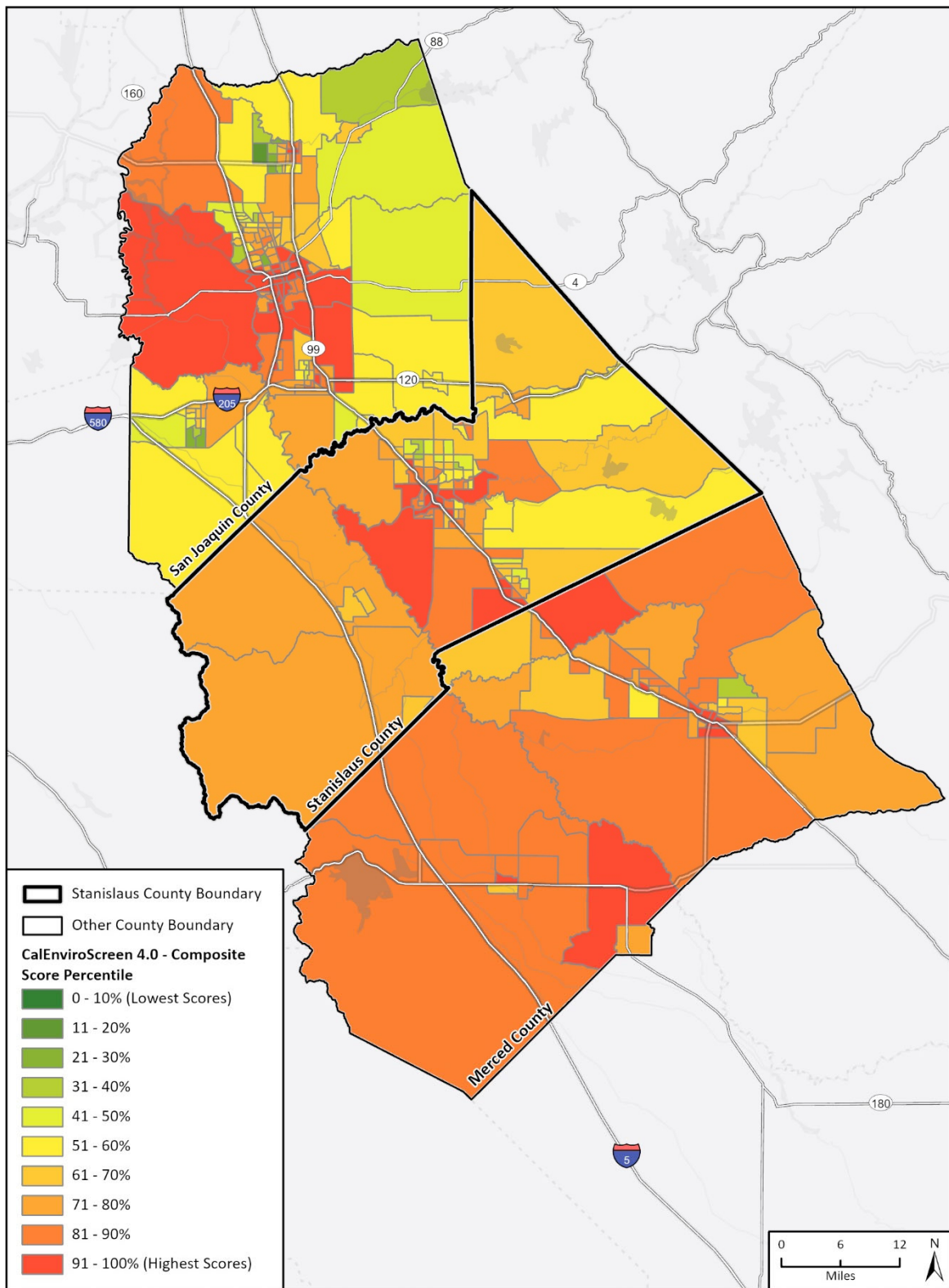
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Figure 3-41 TCAC Opportunity Area – Environmental Score by Census Tract, Region



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

Figure 3-42 CalEnviroScreen 4.0 Percentile Scores, Region



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

3.11.3 Access to Transportation and Location Affordability Index

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

Local Trends

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

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

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

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

¹⁷ AllTransit Metrics, Stanislaus County, CA. <https://alltransit.cnt.org/metrics/?addr=modesto#ma>

¹⁸ CivicMic. Findings and Recommendations Report; Public Engagement in Unincorporated Areas. June 2022. .

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

Regional Trends

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

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

Stanislaus County has a relatively moderate location affordability index compared to the region. As illustrated in Figure 3-45, Stanislaus County has more areas where renters cannot afford greater rents than \$1,500 a month than Merced County, but fewer areas compared to San Joaquin County. Throughout the region, renters near the city centers can afford rents of higher monthly costs when considering transportation costs, as they are expected to spend less on transportation costs.

Figure 3-43 High Quality Transit Stops, Stanislaus County

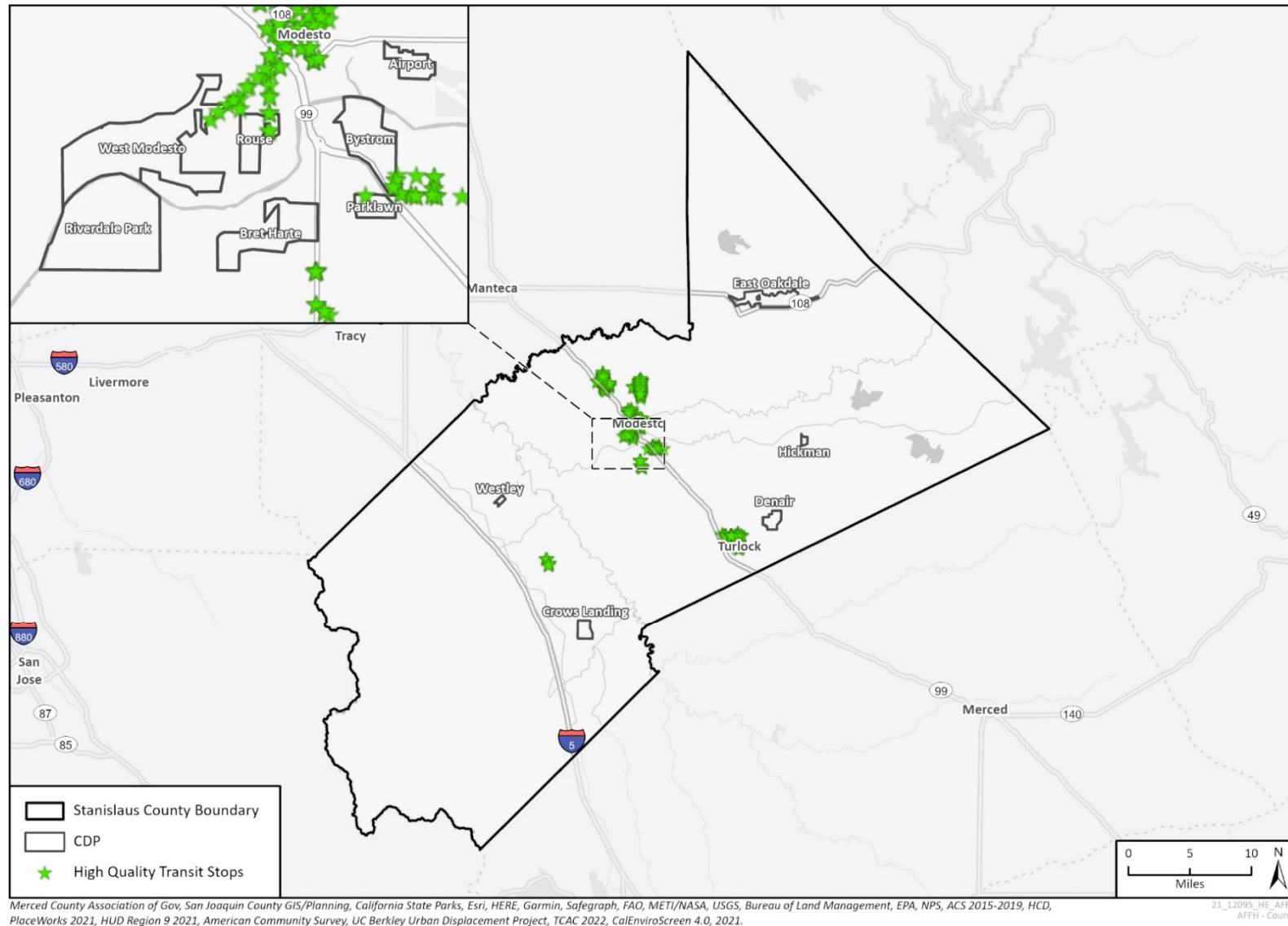
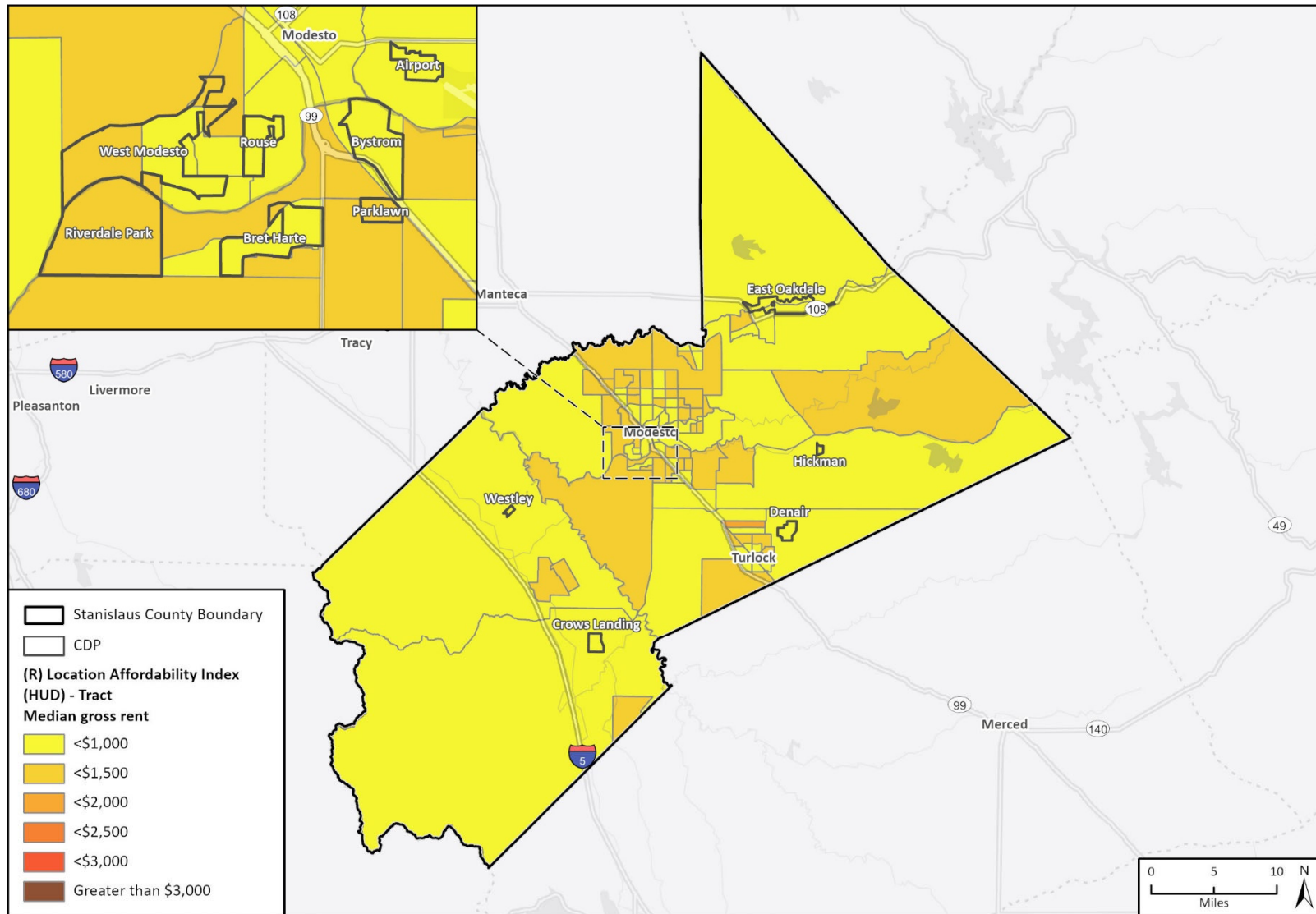


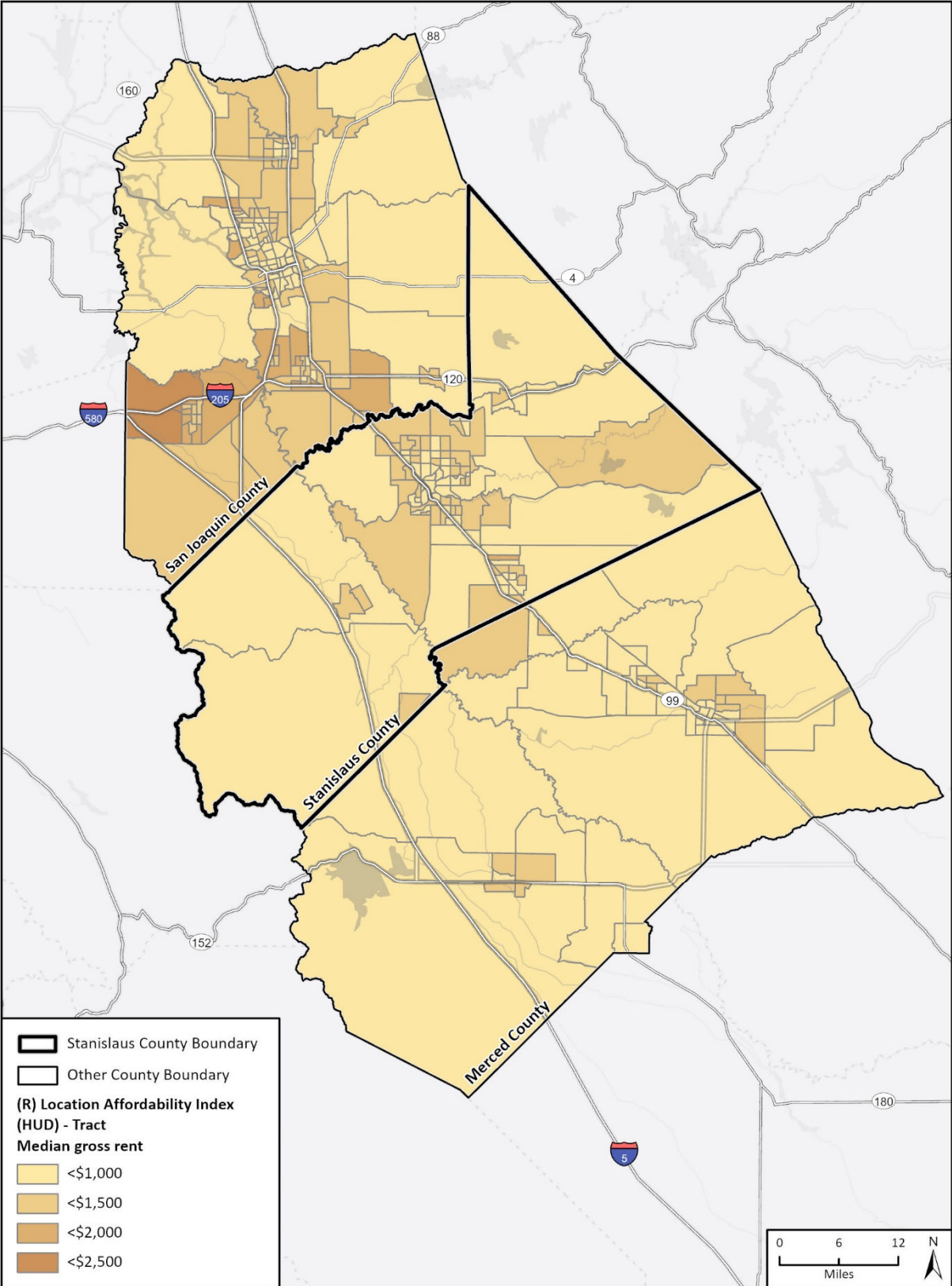
Figure 3-44 Location Affordability Index (HUD), Stanislaus County



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

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



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

3.12 Disproportionate Housing Needs

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

3.12.1 Overpayment

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

Local Trends

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

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

Table 3-14 Overpaying Households

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

Source: HUD, CHAS data 2015-2019.

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

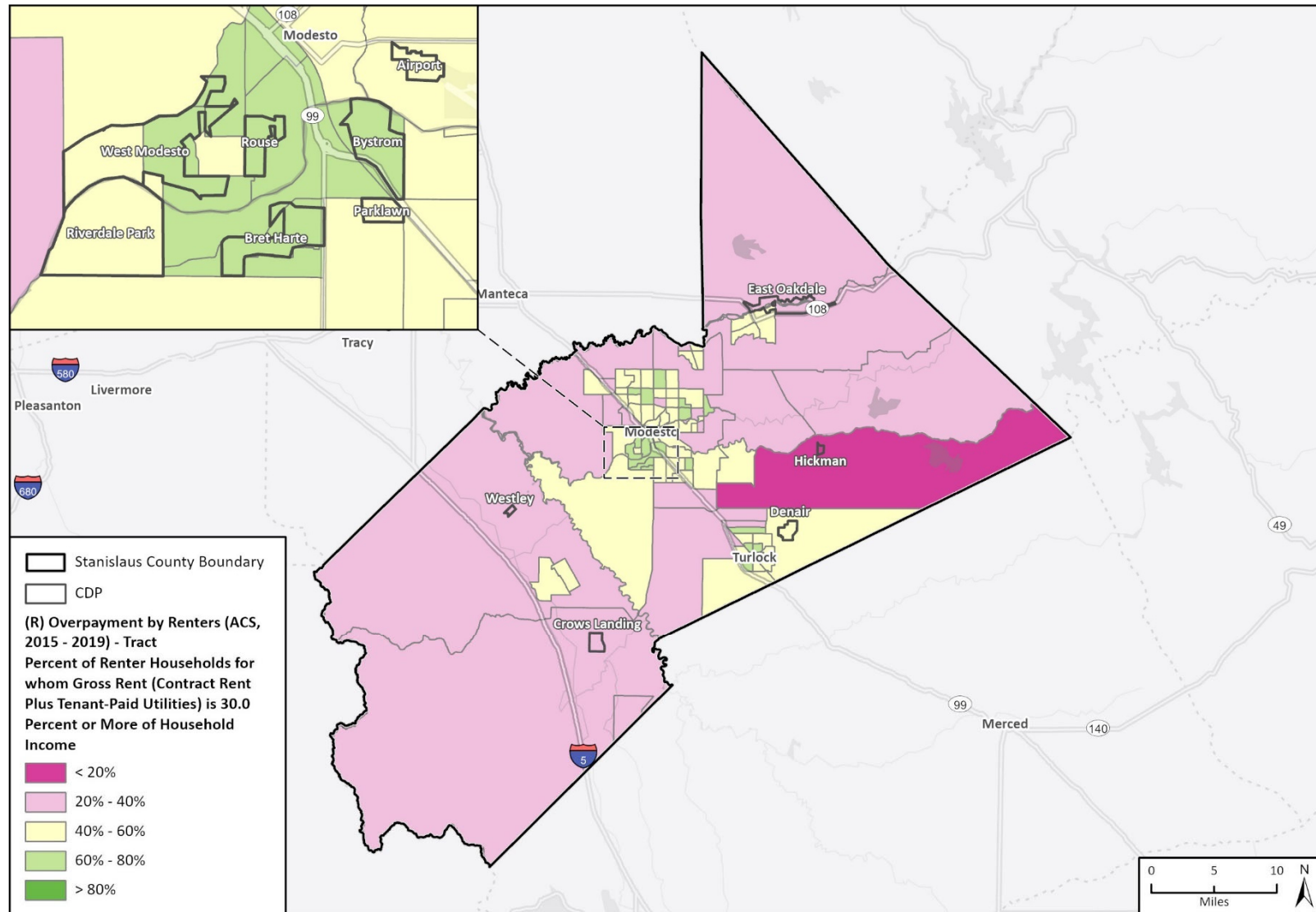
	Total	Cost Burden > 30%	Percent of Total	Cost Burden > 50%	Percent of Total
Stanislaus County					
Household Income <= 30% HAMFI	20,435	16,170	79%	13,540	66%
Household Income >30% to <=50% HAMFI	22,095	16,635	75%	9,230	42%
Household Income >50% to <=80% HAMFI	31,030	17,120	55%	3,940	13%
Lower Incomes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

Source: CHAS data 2015-2019

Regional Comparison

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

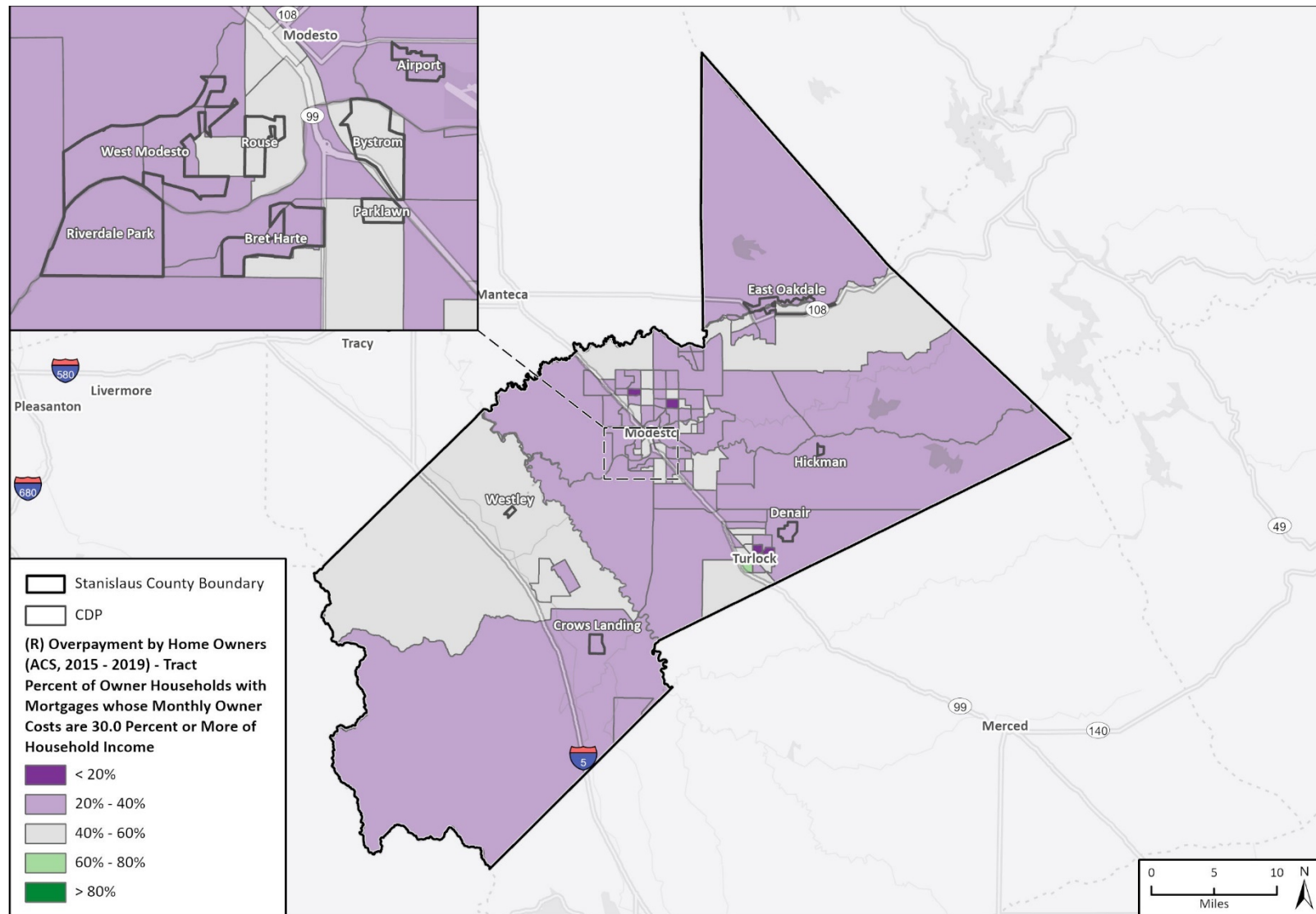
Figure 3-46 Overpayment by Renters, Stanislaus County



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

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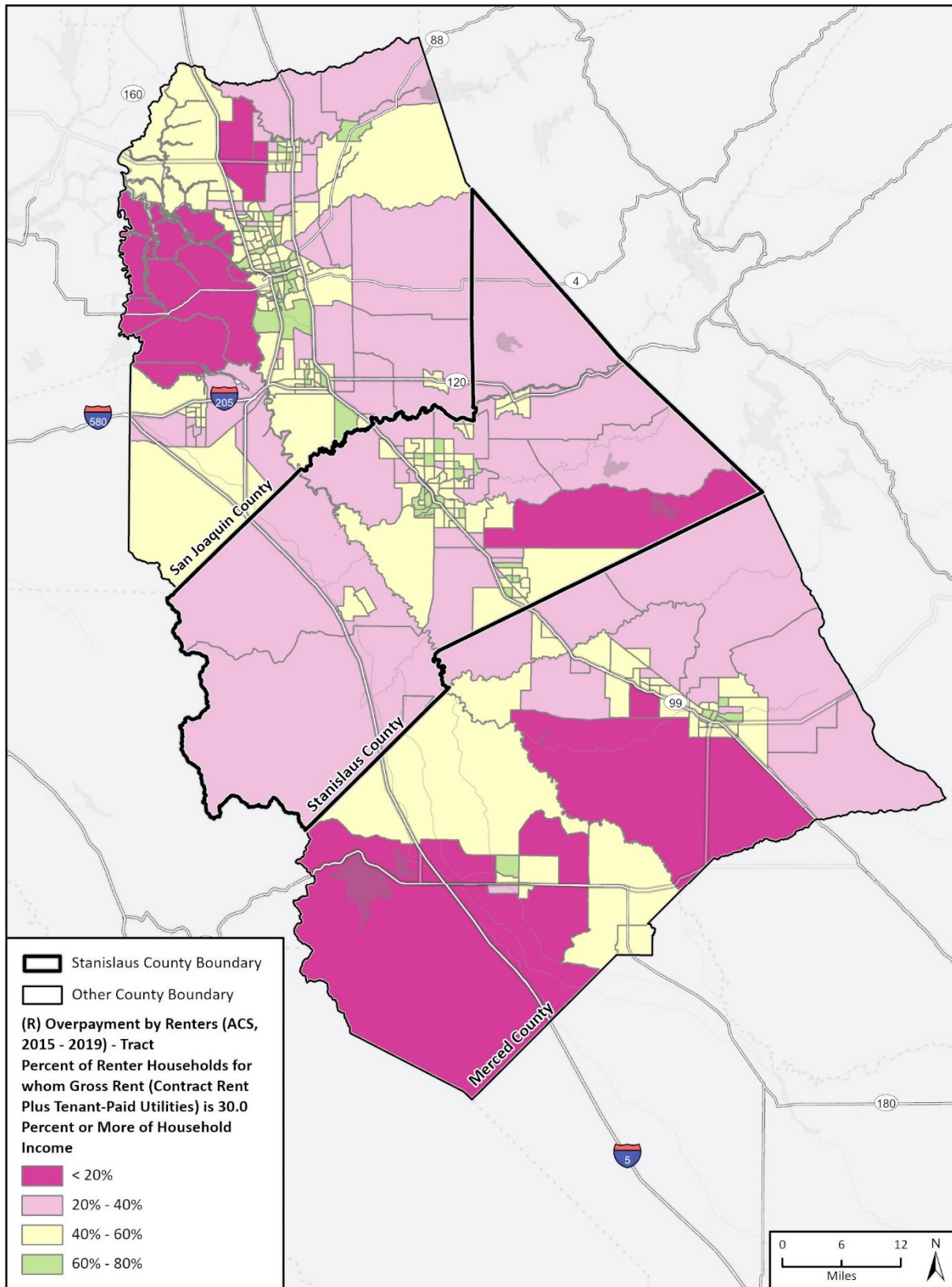
Figure 3-47 Overpayment by Home Owners, Stanislaus County



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

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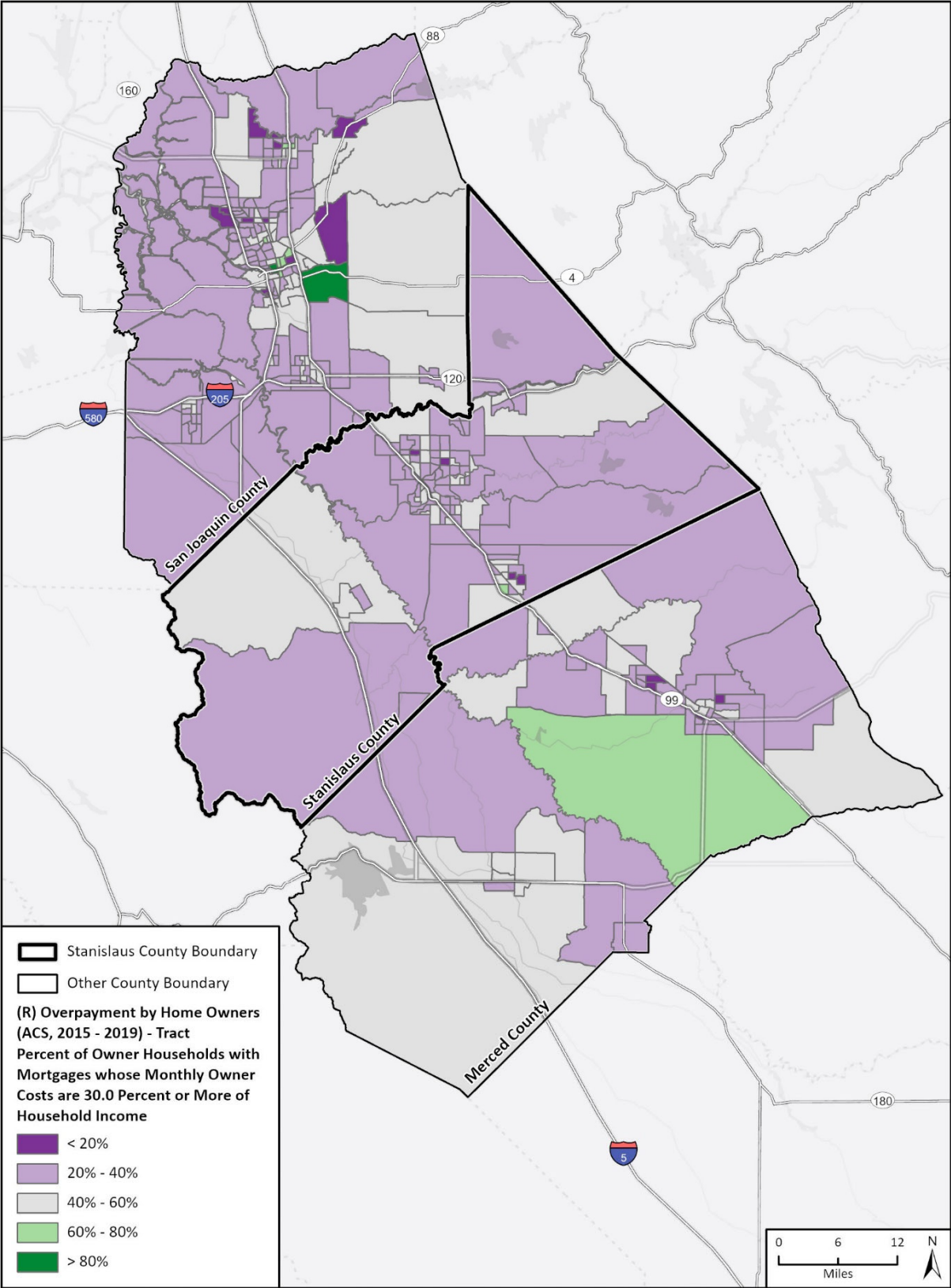
Figure 3-48 Overpayment by Renters, Region



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

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Figure 3-49 Overpayment by Home Owners, Region



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

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3.12.2 Overcrowding

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

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

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

Local Trends

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

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

Table 3-16 Overcrowded Households

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

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

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

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

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

Regional Comparison

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

3.12.3 Housing Problems

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

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

Local Trends

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

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

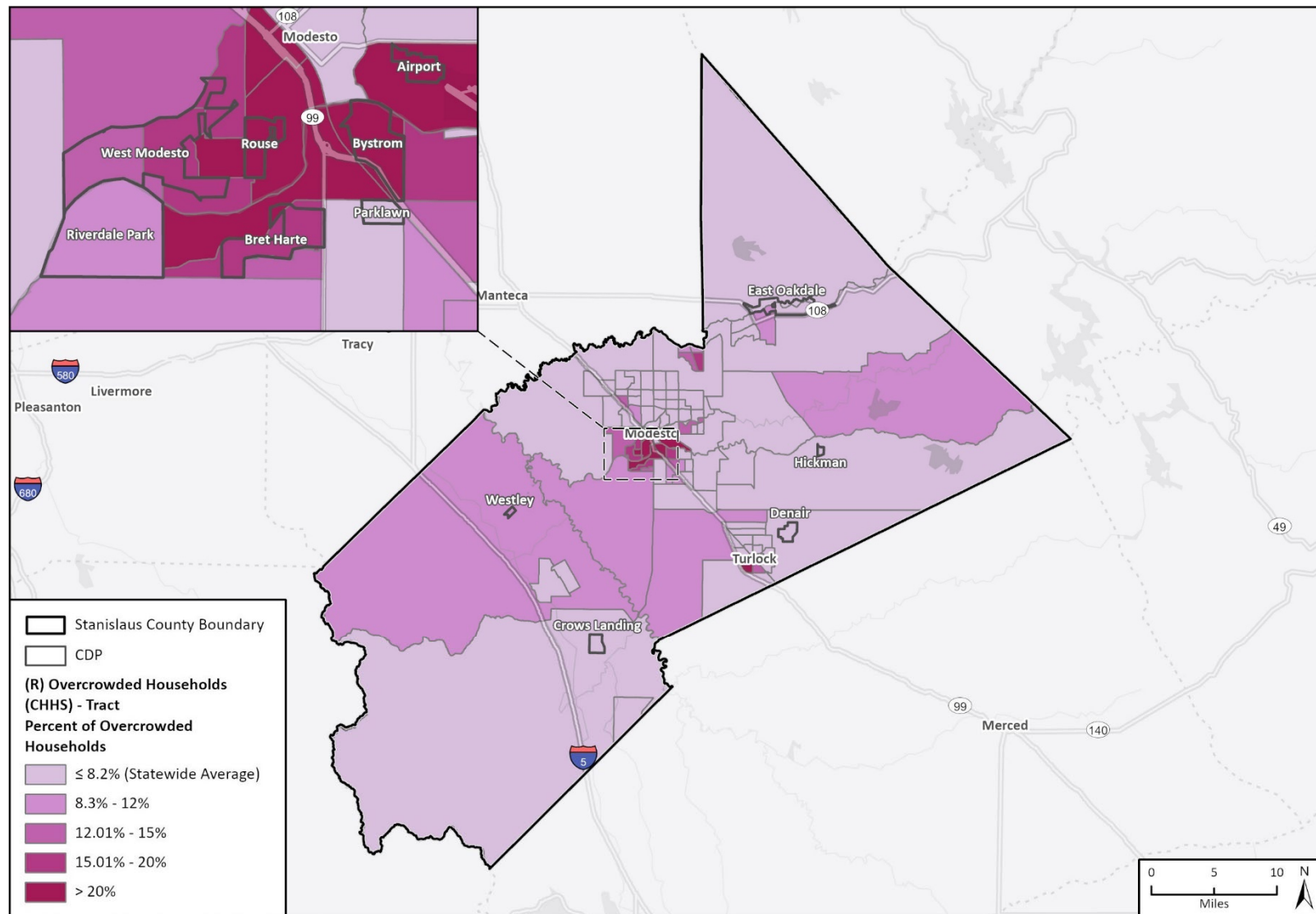
According to 2017-2021 ACS estimates, Stanislaus County has approximately 1,966 substandard housing units, which comprises about one percent of the total occupied units in the County. Of the 1,966 substandard housing units, 33 percent (650 units) lack complete plumbing and 67 percent (1,316 units) lack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

Regional Comparison

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

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

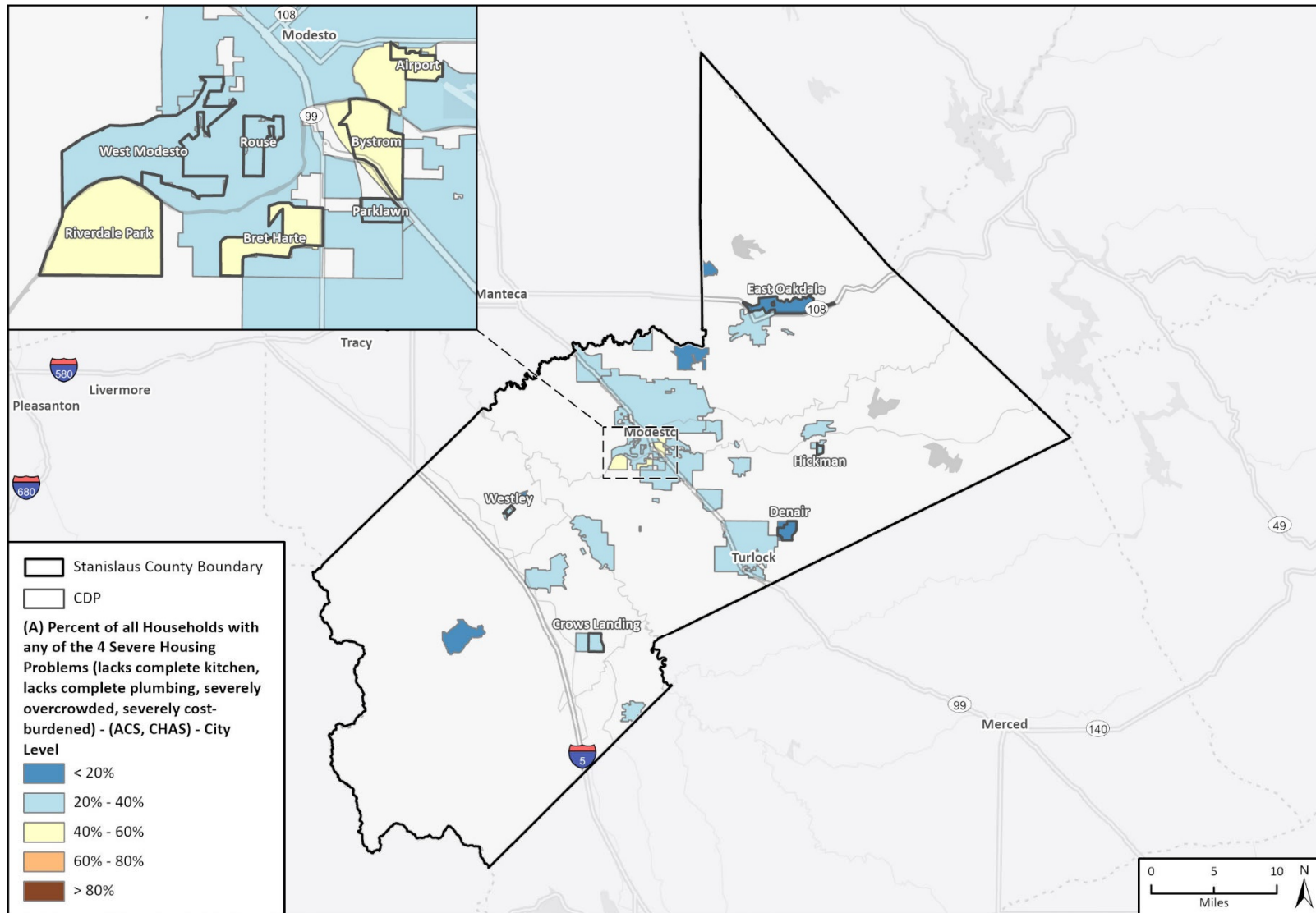
Figure 3-50 Overcrowded Households, Stanislaus County



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

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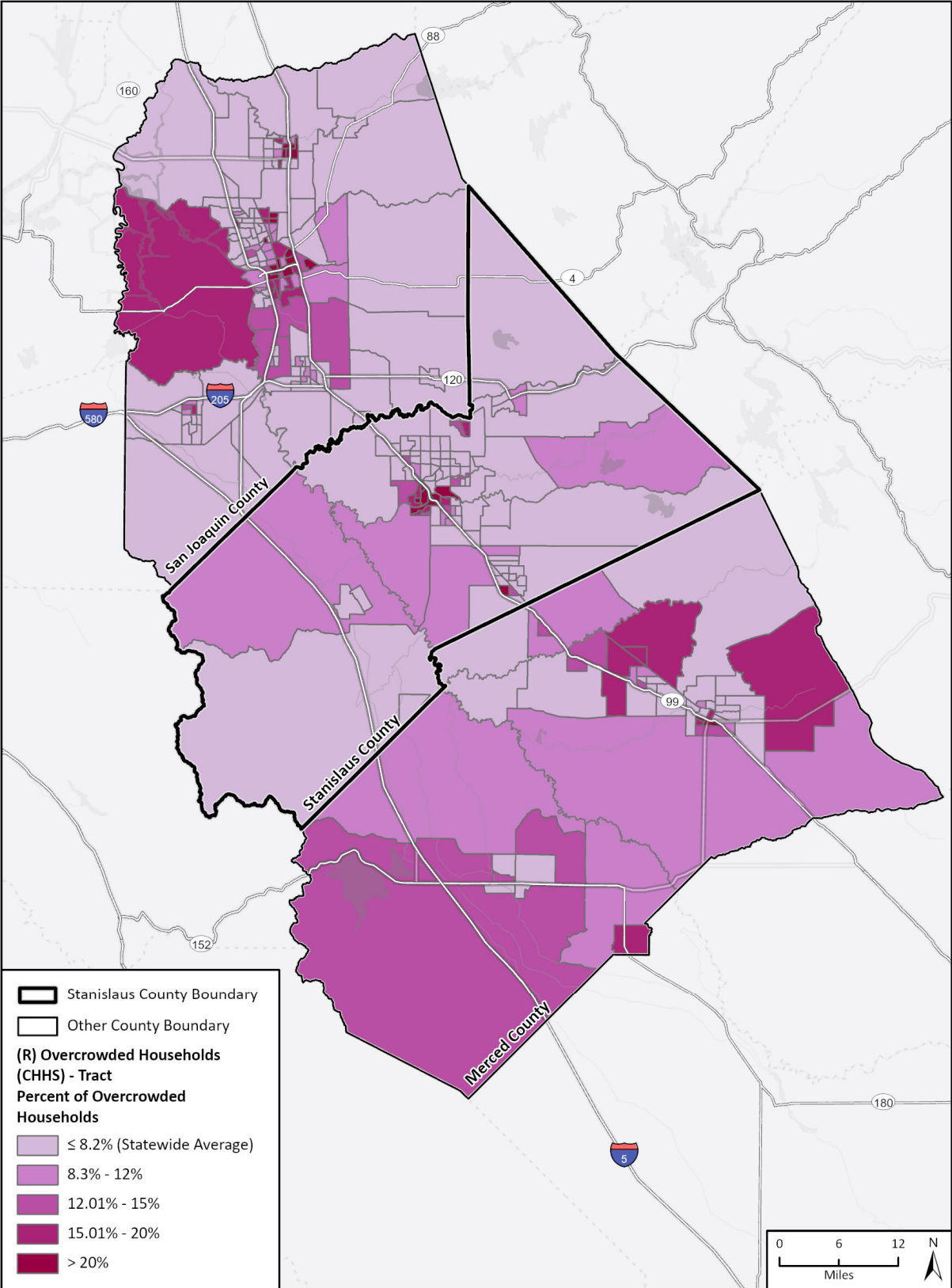
Figure 3-51 Percent of Households with Severe Housing Problems, Stanislaus County



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

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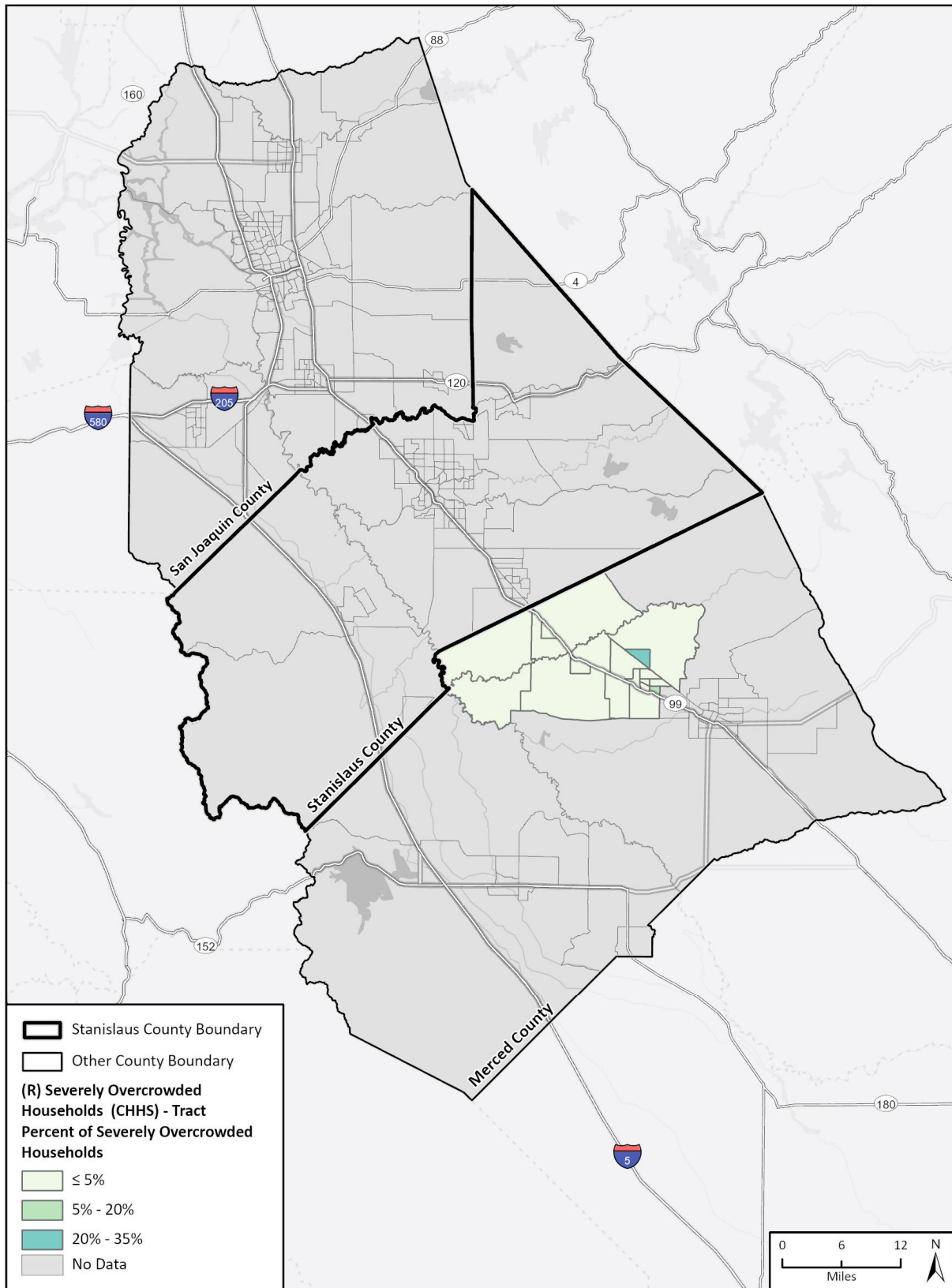
Figure 3-52 Overcrowded Households, Region



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

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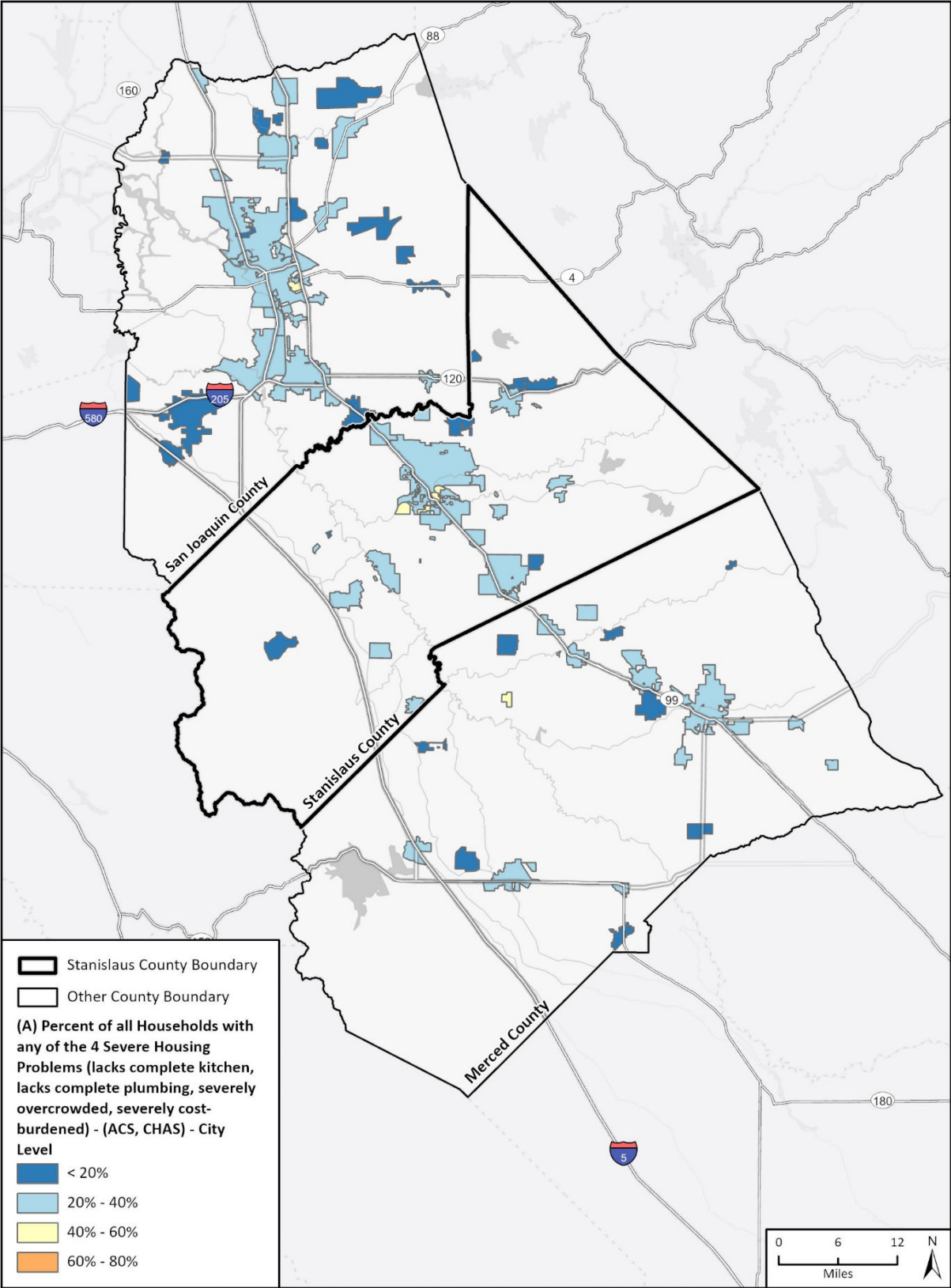
Figure 3-53 Severely Overcrowded Households, Region



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

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



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

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3.12.4 Displacement

Displacement, as defined by HCD, is used to describe any involuntary household move caused by landlord action or market changes. Shifts in neighborhood composition are often framed and perpetuated by established patterns of racial inequity and segregation. The movement of people, public policies, investments (such as capital improvements and planned transit stops) and flows of private capital can lead to displacement. Displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, aging unmaintained units, and insufficient market-rate housing production. Decades of disinvestment in lower-income communities, coupled with investor speculation, can result in a rent gap or a disparity between current rental income of the land, and potentially achievable rental income if the property is converted to its most profitable use. These processes can disproportionately impact people of color, as well as lower-income households, persons with disabilities, large households, and persons at-risk of or experiencing homelessness.¹⁹

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

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

Local Trends

According to the UDP metrics, sensitive communities are concentrated in the central and southwestern parts of the County (Figure 3-55). Rouse/Colorado, Riverdale Park Tract, Bret Harte, Bystrom, Airport, Empire, and Crows Landing are the CDPs that are sensitive communities. These sensitive communities include populations that are vulnerable to displacement and have at least 20 percent of residents that are very low-income. As Figure 3-56 shows, most of the County has a lower displacement risk. Parts of the County with the highest risk of displacement are within or near the cities of Modesto and Turlock. Airport, Bystrom, and part of West Modesto all have one group at risk of displacement, meaning that there is either a high or elevated risk for an income group within that census tract. Within these three areas, there is an elevated risk for very low-income households. Rouse/Colorado is the only location where there are two income groups at risk of displacement: a high risk of displacement for low-income and extreme displacement risk for very low-income households. Census tracts with higher displacement risk also overlap with R/ECAPs and areas with higher poverty rates, high rates of overcrowding, and high rates of overpayment by renters.

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

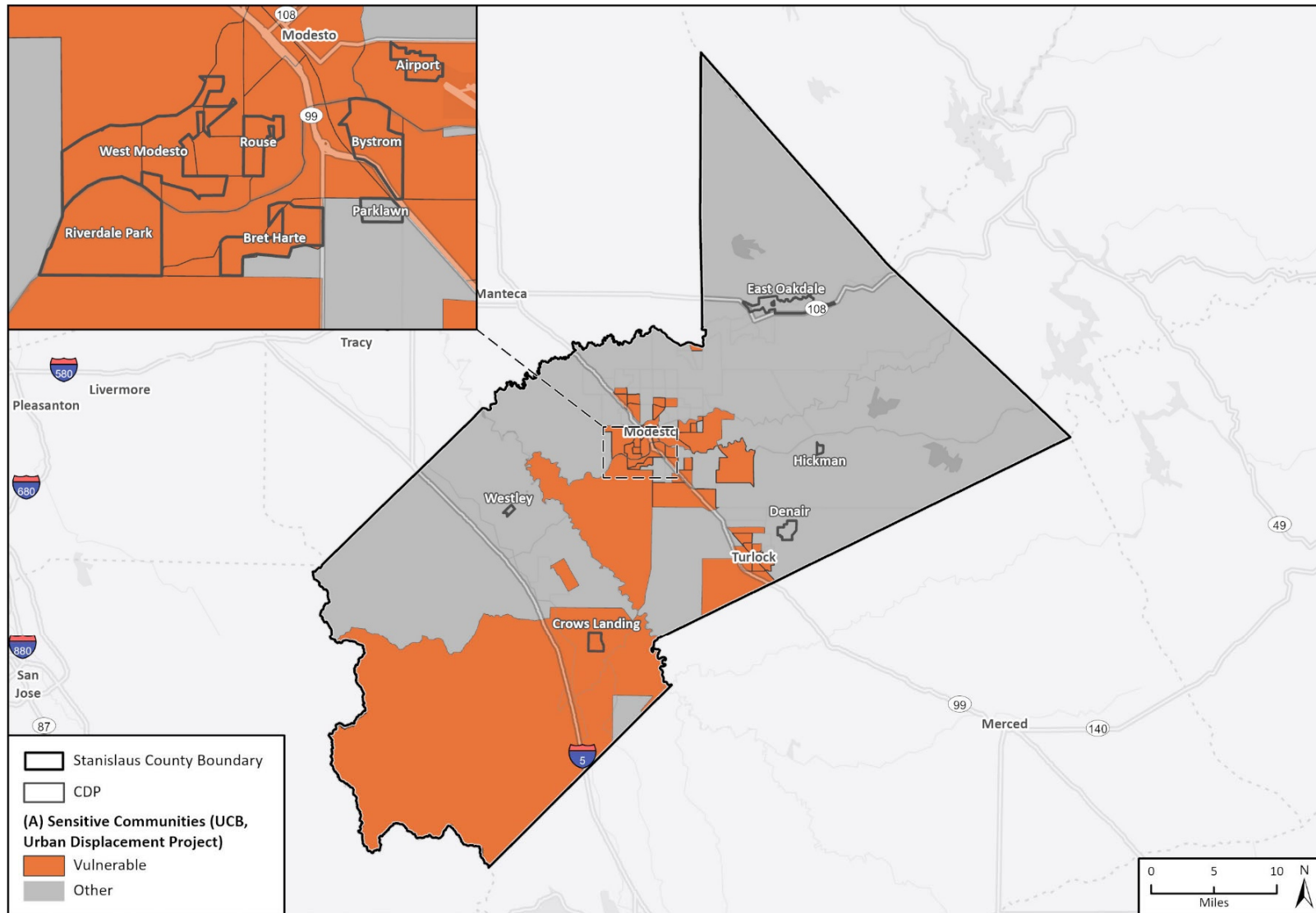
¹⁹ HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

Affordable Housing) and 5-3 (Displacement Prevention) contain actions to mitigate displacement risk by preserving existing affordable housing and connecting at-risk residents to legal services and resources.

Regional Comparison

Stanislaus County is the only County in the Northern San Joaquin Valley where one or more income groups risk displacement. Generally, most of the region has a low risk of displacement and areas at risk of displacement are seen within major cities, as seen in Figure 3-57. The areas at risk of displacement overlap with areas that experience higher rent.

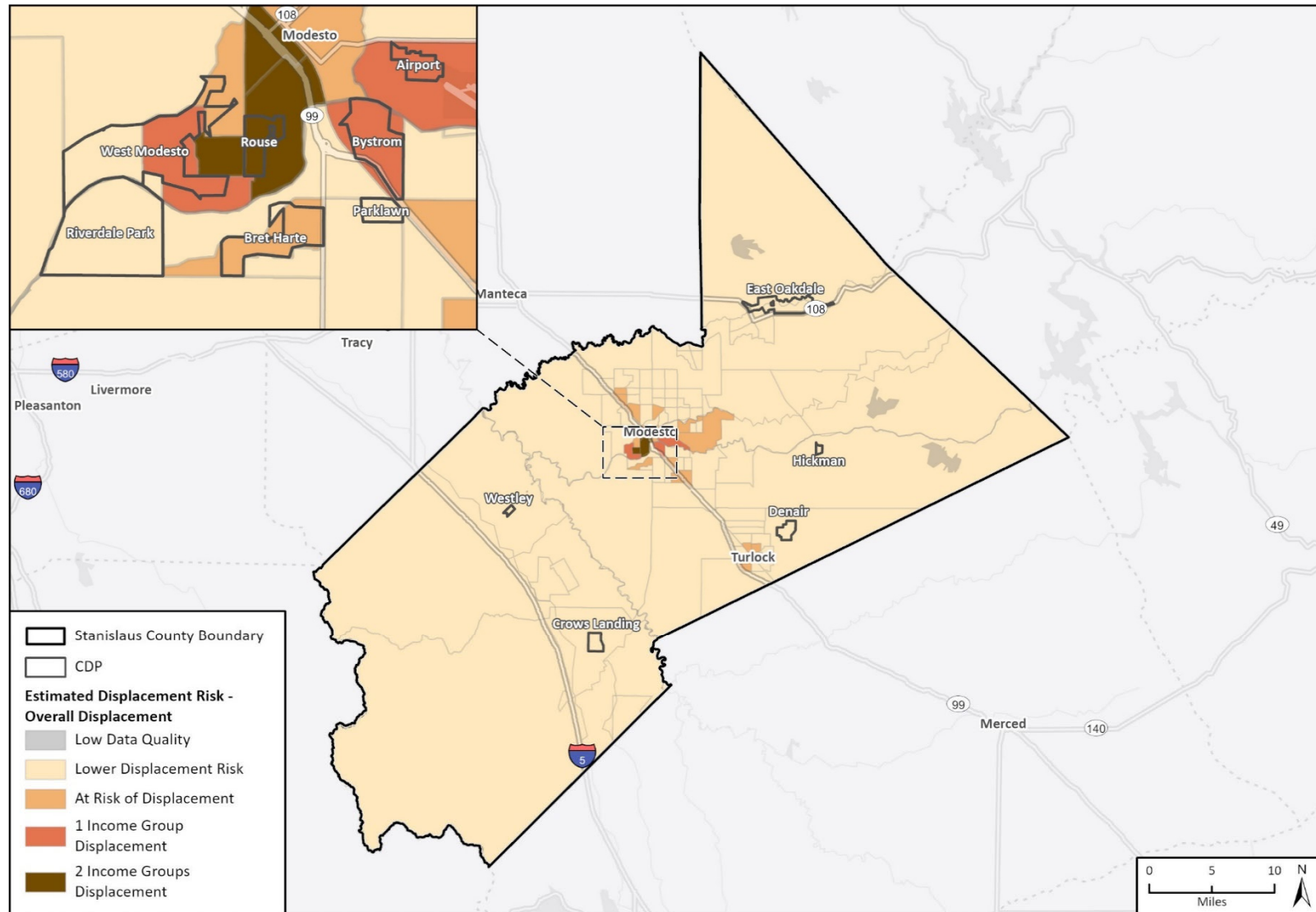
Figure 3-55 Sensitive Communities, Stanislaus County



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

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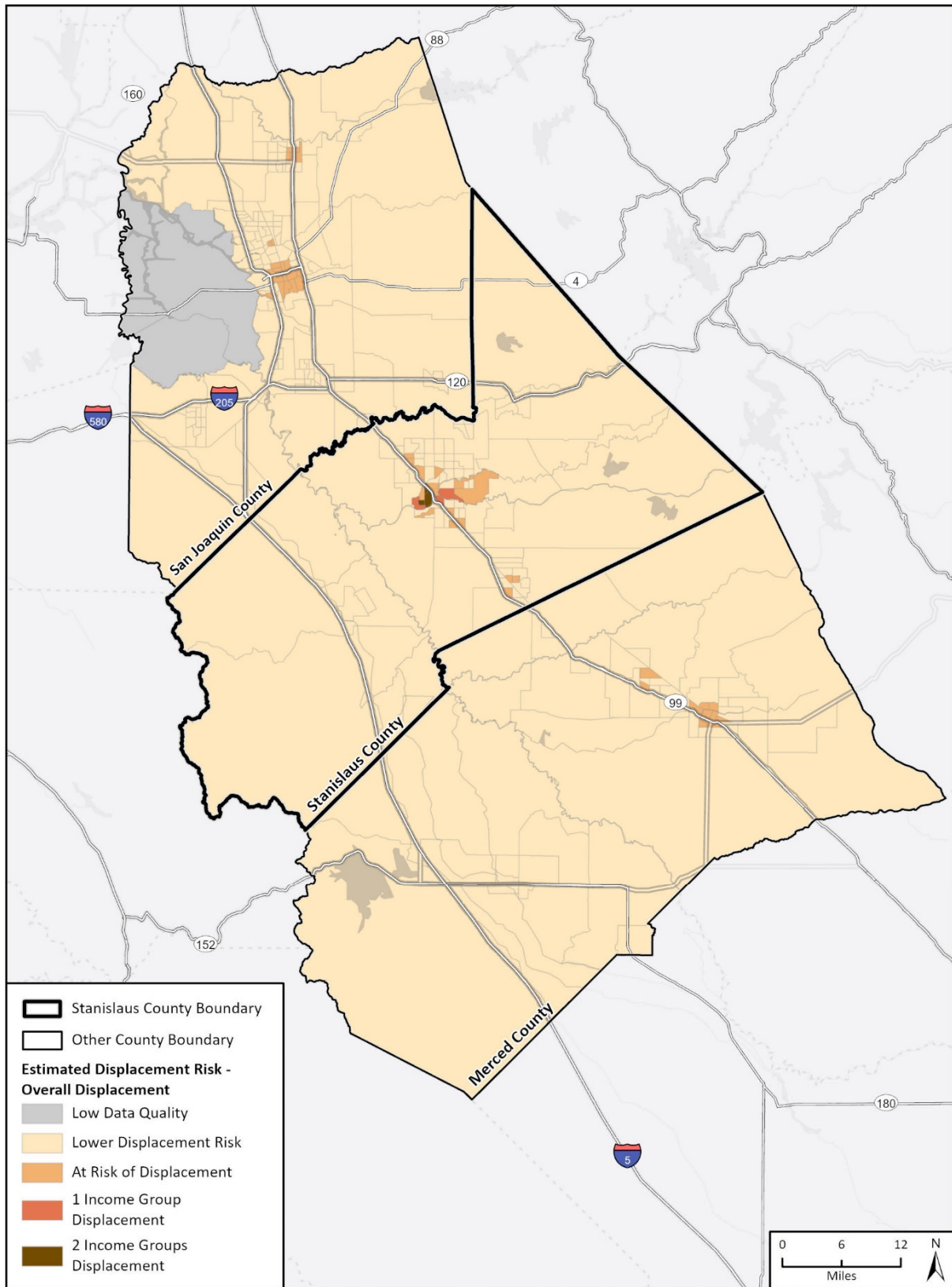
Figure 3-56 Estimated Displacement Risk, Stanislaus County



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

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Figure 3-57 Estimated Displacement Risk, Region



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

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3.12.5 Homelessness

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

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

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

Local Trends

The primary quantitative data source on shelters for homelessness and homelessness count is the Point-in-Time (PIT) count. With help of volunteers, the 2023 count was organized by the Stanislaus Community System of Care (CSOC) to track the number of people who are currently experiencing homelessness. The 2023 PIT count identified a total of 2,091 people experiencing homelessness in Stanislaus County. Of the individuals counted in Stanislaus County, 941 were unsheltered, and 1,150 individuals were sheltered. Most homeless individuals identified in the PIT Count were located in incorporated cities, including the cities of Modesto (78 percent of total homeless population) and Turlock (11 percent of total homeless population). Of the total homeless individuals counted, 79 were located in unincorporated communities, with the highest count located in Empire (76 individuals, four percent of total homeless population). Three homeless individuals were recorded in Keyes (less than one percent of the homeless population). It can be assumed that most of the County’s homeless population are located in more urban areas as these areas are closer to services and resources.

Of the homeless individuals counted in 2023, approximately 23 percent identified as having a mental illness and 12 percent identified as survivors of domestic violence. As seen in Table 3-18, those counted were likely to be Hispanic, White, or Black or African American. While the 2023 PIT Count does not break down population characteristics for homeless individuals by geographic area within the County, it can be assumed that population characteristics of homeless individuals residing in the unincorporated parts of the County are similar to those of the overall homeless population. CSOC’s 2021 Regional Strategic Plan to Address Homelessness identified that Black/African American individuals are disproportionately represented in the homeless population compared to the overall population of the County, while most other racial/ethnic groups were equally or underrepresented.

Table 3-18 Homelessness by Race, Stanislaus County

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

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

When it comes to housing for homeless individuals, Stanislaus County has 14 available emergency shelters, as seen in Table 3-19. Out of the emergency shelters in the County approximately 93 percent of them have occupied beds (Figure 3-58).

Table 3-19 Emergency Shelters in Stanislaus County

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

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

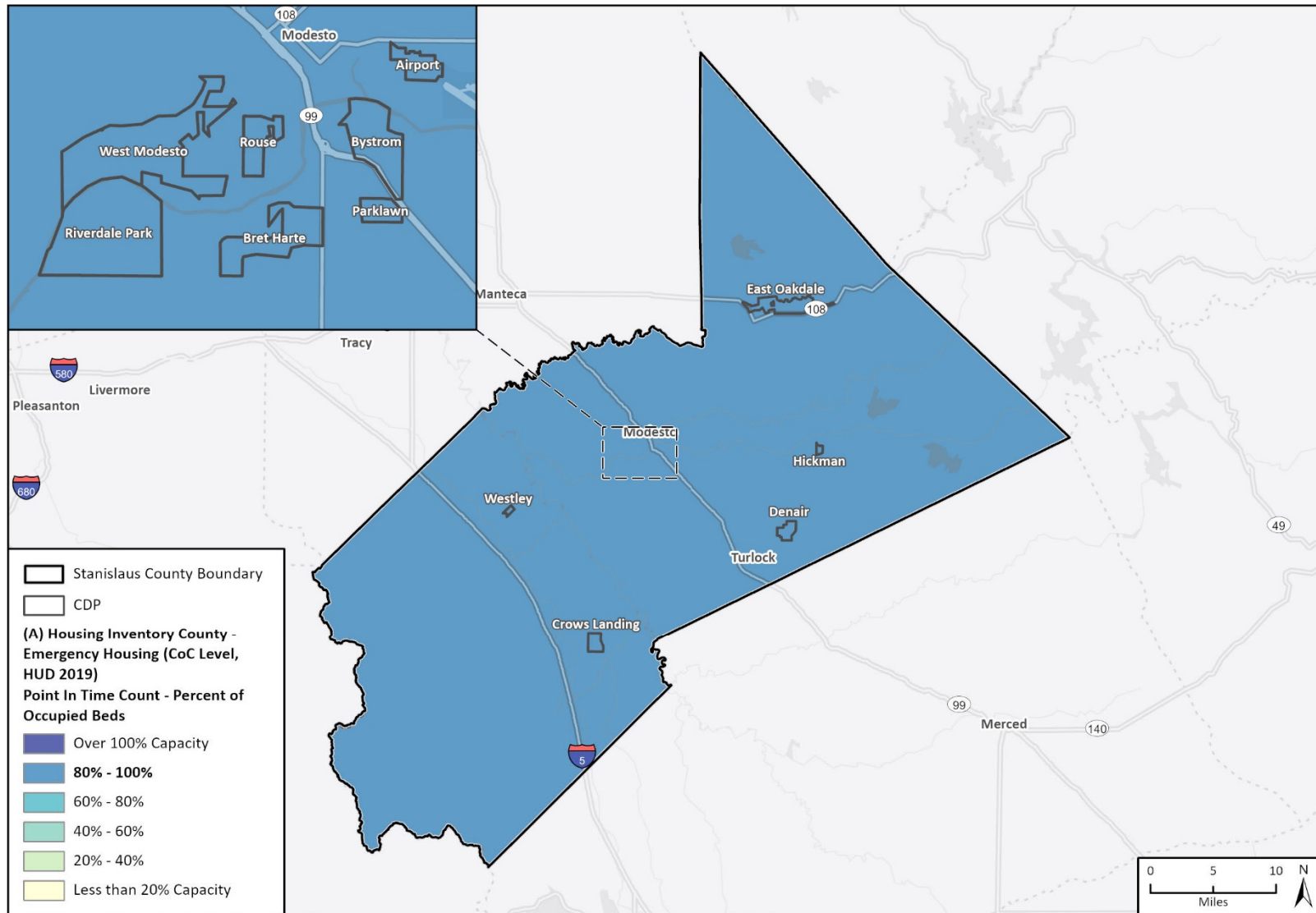
Source: Point-in-Time Count – Emergency Shelter Housing, HUD 2020 CoC Housing Inventory Count

The 2021 Regional Strategic Plan to Address Homelessness identified barriers to addressing homelessness in communities throughout the County. In unincorporated areas of the County, the biggest barriers were identified as insufficient mental health support and the high cost of housing. Community engagement associated with the Strategic Plan included a community survey to identify gaps in resources and strategies to improve services for the County's homeless population. Through this survey, community members identified the need for more/better outreach to engage homeless individuals and to spread awareness of available resources. Actions identified to address homelessness in unincorporated areas of the County included substance abuse treatment, more permanent supportive housing, and innovative housing solutions (such as shared housing or tiny homes). These barriers were similarly identified in most of the incorporated cities in the County as well. The majority of Black/African American and Trans/Non-binary/Gender Non-Conforming survey respondents also reported that they disagree with the statement that "in the Stanislaus homeless system of care, everyone is treated fairly and has equal access to homeless services and housing in the community, regardless of who they are." LGBTQ+ people experiencing homelessness throughout the County also reported experiences of discrimination and denial of services and housing. The County will implement Program 4-3 to address homelessness in unincorporated County, which includes supporting the development of emergency shelters and transitional and supportive housing programs by pursuing federal and state funding, amending development standards for emergency shelters, and coordinating with regional agencies and service providers.

Regional Comparison

In comparing the number of available beds in Stanislaus County to the other counties in the region, Stanislaus lies in the middle and is the only County that provides a seasonal emergency shelter. Regionally there are a total of 36 emergency shelters, with 17 in San Joaquin County, 14 in Stanislaus, and five in Merced County. However, these shelters are reaching capacity with 100 percent of the beds occupied in San Joaquin County, 93 percent in Stanislaus County, and 53 percent of beds occupied in Merced County (Figure 3-59). Overall, with the lack of capacity in existing emergency shelters, there is a greater need for more emergency housing located throughout the region to support the needs of homeless individuals.

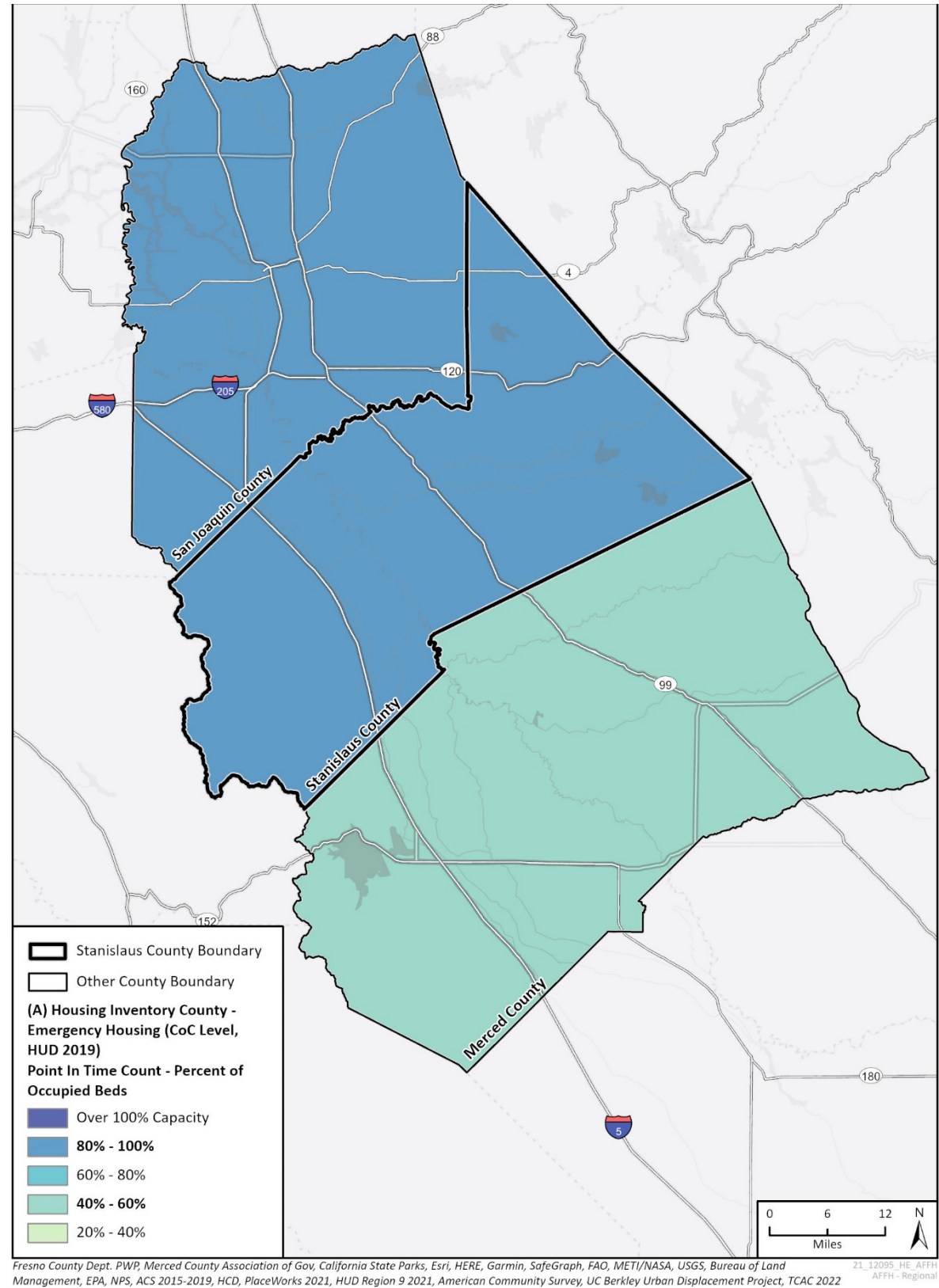
Figure 3-58 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Stanislaus County



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

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Figure 3-59 Housing Inventory Count – Emergency Housing CoC Level HUD 2019, Region



3.13 Local Knowledge

3.13.1 Historic Patterns of Segregation

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

The first inhabitants in the San Joaquin Valley were the Yokut-speaking tribes, composed of approximately 50 groups who spoke various dialects. Mexican ranchers and American settlers gained prominence in the 1800s and raised animals. After the U.S. annexed California in 1848, the federal government sold vast tracts of land to the Southern Pacific Railroad Company as well as ranching, and farming interests, ignoring and overriding the property rights of Mexican and Indigenous landholders. Many Native American tribes were forced to give up their land and live on reservations.²⁰ When gold was discovered in 1848, thousands of prospectors came to the San Joaquin Valley and with them, they brought diseases that quickly decimated the Native American population.²¹

Chinese and Japanese immigrants, originally brought to California by the Gold Rush and later to work on the Southern Pacific Railroad, began to work as farm laborers throughout the San Joaquin Valley. However, resentment towards Chinese and Japanese immigrants, especially by jobless white residents, led to farms recruiting Black/African Americans from the southern U.S. to replace them as farm laborers. Many Black/African Americans began by working in the fields and vineyards and eventually transitioned from farm labor to living in the cities and towns.²²

In the 1930s, nearly half a million people migrated to Southern and Central California from across the United States during what was known as the “Dust Bowl.” Many of these people moved to California in hopes of working in the agricultural industry, but were forced to take temporary and transient work, leaving them with little choice but to form makeshift camps near roadsides and ditches, without access to housing, clean water, and sanitation. These conditions, as well as lack of medical treatment and education, were exacerbated for the non-white migrant farmworkers as a result of economic and racial segregation. When World War II created a need for manufacturing labor, many of the white “Dust Bowl” workers relocated to other cities in California, such as San Francisco, Los Angeles, and San Diego, leaving a gap in farm labor.²³ Japanese, Punjabi, and Filipino people, as well as Black/African Americans from cotton regions, filled the void. Japanese residents, however, were forcibly relocated to internment camps from 1942 to 1946.²⁴

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

²⁰ PolicyLink. Facing History, Uprooting Inequality: A Path to Housing Justice in California. https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf

²¹ Tule River Indian Tribe of California. 2018. Tule River History. <https://tulerivertribe-nsn.gov/history/>

²² Michael Eissinger. 2009. The Transplantation Of African Americans And Cotton Culture To California’s Rural San Joaquin Valley During The Nineteenth And Twentieth Centuries. https://meissinger.com/uploads/3/4/9/1/34919185/transplantation_of_african_americans_and_cotton_culture_to_californias_rural_san_joaquin_valley.pdf

²³ Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives. https://www.csub.edu/library/_files/DB_files/OkieHealth.pdf

²⁴ History.com. Japanese Internment. <https://www.history.com/topics/world-war-ii/japanese-american-relocation>

Migrants today confront multiple social, environmental, and access issues, including affordable, safe, and sanitary housing.²⁵

Increasingly after the first World War, to circumvent the US Supreme Court ban on outright racial zoning, local governments implemented other forms of exclusionary zoning that avoided direct mention of race but kept lower-income people of color out by marshalling land use regulations against them. Through residential zoning that mandates larger parcel sizes for single-family homes, typically unaffordable to people of color, wealthier households established and maintained mostly white neighborhoods throughout California. The federal government subsidized white homeownership and wealth-building and excluded people of color.²⁶

Throughout the state, but particularly concentrated in inland areas, some cities have used their annexation power to reinforce patterns of racial exclusion and segregation. Since the 1960s, as cities expanded and selectively annexed land, some deliberately bypassed and grew around communities of color in unincorporated neighborhoods, the very places people of color were relegated to by restrictive covenants. This selective annexation process has left hundreds of disadvantaged unincorporated places, disproportionately of color, without the most basic elements of a healthy, safe community, such as utilities, sanitation, safe drinking water, and other critical community services. Restrictive covenants, exclusion, and racial violence pushed Black/African American and lower-income people of color to settle outside of towns. In places throughout the San Joaquin Valley and on the fringes of cities such as Fresno, Bakersfield, Stockton, Tulare, and Modesto, such communities of color were left unincorporated and without access to incorporated areas' tax revenues or infrastructure.²⁷ Exclusionary post-war development started moving further from city centers, and within time, these communities often created their own civic and utility districts, which redistributed investment away from cities, in a movement known as "White Flight."

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

The agricultural industry continues to play a large role in the economy and development patterns throughout the Northern San Joaquin Valley region. Small predominantly Hispanic/Latino communities, such as the Monterey Park Tract in Stanislaus County, were once home to Black/African American farm workers, and today remain isolated from other areas of the County. Areas such as these have high rates of poverty, experience disproportionately high pollution burden and lack reliable water systems.²⁸ Although according to the County's Disadvantaged Unincorporated Communities Report, the County is making efforts to inventory each communities needs and install the necessary infrastructure.²⁹ Incorporation and annexation has continued to be an issue in the

²⁵ Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives.

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

²⁶ National Parks Service, U.S. Department of the Interior, and National Historic Landmarks Program, Civil Rights in America: Racial Discrimination in Housing, March 2021.

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

²⁷ PolicyLink. Facing History, Uprooting Inequality: A Path to Housing Justice in California.

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

²⁸ Jose Del Real. 2019. How Racism Ripples Through Rural California's Pipes. <https://www.nytimes.com/2019/11/29/us/water-racism-california.html>

²⁹ Stanislaus County Disadvantaged Unincorporated Communities Report, November 2015.

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

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

3.13.2 Development Patterns within the Unincorporated County

After World War II, rapid growth throughout the state led to a boom in housing development, resulting in urban development expanding into unincorporated lands. This created a proliferation of local agencies with inefficient and overlapping service boundaries, and a rapid conversion/loss of California's agricultural and open-space lands. Many cities found it necessary to annex neighboring County land to accommodate additional development. The process for annexation required property owners to petition cities to be included in an annexation area. Thus, annexations were typically on vacant lands where property owner consent was more easily obtained, bypassing adjacent inhabited neighborhoods where residents may be resistant to annexation for numerous reasons and could defeat an annexation during an election. Reasons for opposition to annexation included fear of potential tax increases, a desire to preserve community identity, and other advantages they perceived for keeping their neighborhoods' unincorporated status.

Many of the unincorporated areas also had infrastructure deficiencies that would be expensive to upgrade to meet standards (e.g., no curb, gutters, sidewalks, public sewer and/or water systems, street lighting, drainage, etc.). These areas also lacked sufficient revenue-generating potential to offset the costs of upgrading or implementing these improvements. If there was strong opposition to annexation, cities often avoided pursuing inclusion of these inhabited areas against the will of the residents. As a byproduct of these land use policies, unincorporated pockets (peninsulas of unincorporated territory) and islands (areas substantially or fully surrounded by city limits) were generated as select areas of land were annexed into incorporated cities. The majority of island and pocket areas in Stanislaus County are located within the SOI of the cities of Modesto, Ceres, and Turlock. Residents living in unincorporated pockets or islands tend to receive services from a combination of service providers. In addition to on-site, private systems (e.g. well or septic), unincorporated areas may also receive services from an adjacent city, the County, and one or more special districts. This situation can create public confusion over jurisdictional boundaries and service responsibilities. Inefficiencies are inherent when two different agencies may provide the same type of service (at varying service levels) to different portions of the same neighborhood and cross each other's territory on their way to provide such service(s).

To help resolve this issue, the State Legislature created Local Agency Formation Commissions (LAFCOs) in each county to provide oversight of boundary changes and the creation or reorganization of agencies. Stanislaus County LAFCO's policies encourage the elimination of islands as well as unincorporated pockets. Similarly, LAFCO's policies encourage the efficient provision of services in unincorporated communities which may not be adjacent to or anticipated to annex to a neighboring city. State legislation requires cities and counties to identify and analyze islands, fringe and legacy communities as part of their general plans, and encourages the annexation and extension of services to disadvantaged communities. A disadvantaged community is one with an annual median income that is less than 80 percent of the statewide annual median household income, which includes the majority of unincorporated islands in Stanislaus County. Annexations for the purpose of incorporating land are actions initiated by a city and considered for approval by LAFCO, outside of the County's control.

Newly annexed properties are regulated and developed with consistent plans, policies, and standards. They can also tap into city resources and funds that can help with improvements for infrastructure and housing. However, there is little financial incentive for cities to annex these areas and often

residents and/or property owners are opposed to annexation. When annexation occurs, a city takes over service responsibilities for the annexed area and is therefore entitled to a portion of the revenues previously allocated to the county to offset the service costs. The greatest impediment to such annexations is providing municipal infrastructure (curb, gutter, sidewalks, streets, sewer, storm drain, lighting, etc.) consistent with city standards.

Over the years, Stanislaus County has undertaken various steps to address infrastructure needs within unincorporated developed neighborhoods; steps needed to both preserve and enhance existing housing and to support further housing development. With the establishment of a Redevelopment Agency (RDA) in 1991, which was later dissolved by the State in 2012, the County worked to improve areas that were developed without adequate sewer systems, storm drainage (including curbs and gutters), and sidewalks. The establishment of the RDA included a settlement agreement for the purpose of protecting against, and to compensate for, displacement of very low-, low-, and moderate-income households by public and private development activities and to expand the supply of housing available within the RDA project area for households of these income levels. Efforts to expand the supply of housing included a commitment of 25 percent of the gross tax increment (five-percent greater than State requirements) to improve and expand the supply of housing. Before the RDA's dissolution, the County utilized CDBG, CalHOME, and HOME funds to leverage RDA funding for housing development, housing rehabilitation, and homeownership opportunities; however, the ability to deliver housing projects was limited by the lack of infrastructure. Since the RDA's dissolution, the County has continued its efforts to support affordable housing efforts throughout the County (both in the incorporated and unincorporated areas).

South and West Modesto are comprised of unincorporated islands and pockets which are reflective of the patterns of annexation. Both the South and West Modesto areas are located within the City of Modesto's SOI, a designation set by LAFCO in recognition of the areas probability of annexation. As adjacent lands have developed under City jurisdiction, the disparities in infrastructure quality of roads, sidewalks, and sanitary sewer have become more apparent. Both the County and the City of Modesto recognize that the inconsistent patterns of annexation contribute to a pattern of disparities in access to services and infrastructure. The City is working with the County to improve the provision of services through place-based efforts which are reflected in housing programs for both jurisdictions. The County and the City are also coordinating on the extension of sewer services to areas currently on septic system. The County is coordinating with the City on ARPA funded improvements to unincorporated islands and pockets within the City of Modesto's SOI. All improvements are to be designed and installed to City of Modesto standards with the goal of annexation in the future as funding becomes available to provide improvements to these communities.

3.13.3 Existing County Efforts

The County continues its work to revitalize historically disadvantaged communities and improve access to opportunities for residents throughout unincorporated parts of the County. Efforts include improving access to public infrastructure (including curbs, gutter, sidewalks, streets, sewer, storm drains, lighting, etc.).

Recent efforts to address infrastructure needs in unincorporated areas of the County include the 2020 adoption of a five-year plan for the use of State Permanent Local Housing Allocation (PLHA) funding and the 2022 approval to take over as the lead entity with the purpose of locally retaining HOME funding. In addition, Stanislaus County recently adopted master tax-sharing agreements between the County and the nine cities within the county, providing for a 50-50 tax split among the cities and the County for most annexations. Island annexations were specifically exempted from these master

agreements, providing an opportunity for individual negotiations to occur with each island that could further incentivize annexation.

The CDBG and HOME funding utilized by Stanislaus County are annual allocations of HUD Entitlement Funds. Stanislaus County has served as the lead entity for the Stanislaus Urban County for the purpose of receiving CDBG funding. The Stanislaus Urban County is currently comprised of unincorporated areas as well as the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford. Beginning in 2000, with the City of Turlock serving as the lead entity, the Stanislaus Urban County was part of the City of Turlock/Stanislaus Urban County HOME Consortium for purpose of receiving HOME funding. On July 1, 2023, Stanislaus County became the lead entity of a new HOME Consortium, the Stanislaus HOME Consortium consisting of the Stanislaus Urban County and the City of Turlock. As a partner in housing funds with eight of the County's nine cities, the County is continuously working with its partners and community stakeholders to identify affordable housing opportunities. However, the County recognizes that affordable housing is only one component of the local housing framework. The County led the 2023 Housing Stanislaus effort (housingstanislaus.org) aimed at increasing housing supply throughout Stanislaus County to meet the needs of current and future residents, regardless of age, ability, or income.

In order to meet the housing needs of the unincorporated area, the County has focused its efforts in utilizing the County's portion of CDBG funding to develop sewer systems in areas dependent on septic systems. In accordance with a 2011 settlement agreement resulting from the Committee Concerning Community Improvement et al. v. City of Modesto, et al. lawsuit, the County adopted Residential Neighborhood Infrastructure Project Ranking Criteria which is used to determine the priority usage of CDBG funding; placing priority on public health and safety needs. The County has and continues to leverage State Water Board funds in the development of sewer systems in priority areas. On top of CDBG funds, the County has committed to invest \$50 million of the \$107 million ARPA funds the County received to make infrastructure improvements throughout the unincorporated area. The ARPA funding will be used for a mix of sewer, curb, gutter, and sidewalk improvements throughout the county, including some of the areas identified by the Sites Inventory with rezone sites.

Between 2019 and 2020, the County began development of cost estimates for public improvements covering 41 individual urban pockets (County islands), predominately around the cities of Modesto, Turlock, Ceres, and Riverbank and thirteen County communities. As of September 2022, the estimated total infrastructure cost was approximately \$707 million. In May of 2021, the County allocated \$50 million of American Rescue Plan Act of 2021 (ARPA) funding allocated to the County to be used for community infrastructure improvements. Funded projects respond to the need to achieve an adequate minimum level of basic infrastructure for households in undeveloped areas of the County by providing sewer. The ARPA funds have provided a unique opportunity for the County to make substantial progress strategically in the infrastructure needs of its urban pocket and County communities.

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

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

- Installation of new bus stop shelters with security lighting in the communities of Empire, Hickman, Westley, and Keyes, and within the unincorporated areas of Ceres, Patterson, and Riverbank.
- Replacement of 99 curb ramps meeting current Caltrans ADA standards in the communities of Denair, Del Rio, and Ceres.
- Installation of at-grade sidewalks and class I, III, and IV bike lanes throughout the Airport Neighborhood, improving access to alternative modes of transportation to area residents.
- Completion of Phase I of a Proposition 1 Disadvantaged Communities Involvement Grant intended to alleviate flooding in disadvantaged communities along Dry Creek and the Tuolumne River. Phase I of the project consisted of the selection of ten potential groundwater recharge project sites and development a GIS database of the Dry Creek Watershed. Phase II includes analysis of potential project sites identified in Phase I and selection of the most promising sites.
- The County has invested in improvements to the Fairview Community Park which is surrounded on three sides by proposed rezone sites.
- The Bret Harte neighborhood is in the process of receiving storm drainage (including curb and gutter), sidewalk, and improvements to its current street lighting with ARPA funds.
- The Crows Landing Road corridor is the leading sales tax generating corridor in Stanislaus County. Over the last decade the corridor has seen numerous roadway improvements and the removal of a tallow plant at the northern end of the corridor, which has greatly improved conditions that at one time made the livability in this area challenging. The corridor is currently one of two focus areas for the City of Modesto's South Modesto Planning, which will serve as a blueprint for future development, with guidance on land use, economic development, transportation, infrastructure, and other issues for the Southwest Modesto Plan area.

3.14 Community Input

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

3.14.1 Community Workshops

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

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

- Homeless and transitional housing is the most immediate need in the County.
- Affordable senior housing is needed, very few units available.
- Zoning is a barrier. Appropriate zoning capacity is needed to meet the needs of affordable housing projects.
- There is a need for housing for youth coming out of foster care.
- Increases in rental up-front costs have been a constraint to accessing housing.
- Housing choice vouchers can be obtained but there are few available housing options.

- Proximity to transportation and resources is needed in urban areas of unincorporated County, especially near Modesto.
- Provide more incentives for developers of special needs and senior housing.

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

3.14.2 Stakeholder Interviews

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

- **Community Outreach.** Stakeholders felt that additional effort is needed to help inform and educate community members in the unincorporated areas on housing rights and housing assistance opportunities. Informational and financial resource information is scattered and hard to navigate. Stakeholders report that a central information hub would be highly valued.
- **Investment in Communities.** Stakeholders expressed that some lower income, rural communities have lacked the level of investment seen in incorporated cities and wealthier neighborhoods in the County. In some cases, communities with higher percentages of people of color have received priority for infrastructure investment or consideration for annexation. Stakeholders express a desire for attention to be given to each community, how it is developed, and if the commercial and residential uses are compatible.
- **Language Barriers.** Many households in the unincorporated areas of the County need materials translated to Spanish and online outreach in Spanish to be informed on housing issues and opportunities. Stakeholders expressed the importance of translation services in getting community members to participate.
- **Lack of Transportation Options.** Although there is bus service in the unincorporated County it is not dependable and does not have enough stops throughout communities to make it a reasonable alternative to cars. A lack of transportation options makes it difficult for people, especially seniors and people with disabilities, to get to work, school, local stores and markets, and community services.
- **Lack of Services.** Some unincorporated areas of the County lack sufficient services such as afterschool programs, grocery stores, and banks.
- **Housing Rehabilitation.** Many of the units in the unincorporated County need rehabilitation, however, older long-term homeowners often cannot afford repairs. As a result, these homeowners often do not make the repairs at all or sell the property. Stakeholders felt that owners of rental units in disrepair are not motivated to rehabilitate substandard living conditions voluntarily due to high demand for rental units. Many tenants do not report these substandard living conditions out of fear of losing their housing through eviction or retaliation.
- **Transitional/Supportive Housing and Residents Experiencing Homelessness.** Many people in the community experiencing homelessness generally live in parks, cars, or vacant lots. Many of these individuals suffer from severe mental illness and require mental health services and other social services. Although shelters exist in the area, many are waitlisted, and shelters do not work for all individuals. Additionally, services beyond emergency shelters (i.e., transitional/supportive

housing) are inequitably distributed to white residents. Some stakeholders also expressed that homeless residents are often removed from higher income areas and pushed into lower-income areas, where there is a slower response for clearing encampments.

- **Workforce Housing.** It is difficult for living wage workers to find quality, safe, and affordable units. As a result, residents are living in large, often overcrowded, households or are paying more than 30 percent of their income on housing.
- **Seniors.** Many of the senior residents of Stanislaus County are on fixed incomes and struggle to find affordable housing. Many senior affordable housing facilities currently have waitlists. As mentioned earlier, lower-income senior homeowners struggle with the costs of home repairs and maintenance.
- **Proximity to Jobs.** Many stakeholders expressed the need for affordable housing to be located near centers of employment. Due to a lack of affordable housing options many people are being forced to relocate to afford housing, pulling them further away from their jobs, communities, and basic services.
- **Park Access.** Although there are parks in or near unincorporated communities, many stakeholders expressed that they are not always accessible due to illegal dumping, encampments, and maintenance issues such as lighting. Some stakeholders also expressed that the funds raised for parks and green space through development fees rarely materializes into park development or improvements.
- **Fair Housing Issues.** Stakeholders described cases of discrimination in housing towards undocumented persons, persons with disabilities, non-native English speakers, large households, and those with past experiences in the criminal justice system. Discrimination is usually in the form of not renting units to people who will need reasonable accommodation for a disability, charging higher rent for undocumented tenants, retaliating against or evicting tenants if complaints are made about substandard conditions, and turning away applicants outright based on a false assumption that lower-income residents are more prone to illicit or illegal activity.
- **Mobile Home Parks.** Mobile homes are typically a last resort before homelessness for many lower-income residents. Some stakeholders commented that mobile home parks are coming into corporate ownership, and that these companies increase prices and displacement pressures on existing residents. Additionally, there are often titling issues with the mobile homes that allow park ownership to purchase the mobile home of a displaced resident at minimal cost, simply to resell it at a high price. Individuals residing in mobile home parks currently have few protections and need support and assistance (i.e., rent stabilization) to prevent homelessness.
- **Community Education and Outreach.** Many stakeholders felt there was an opportunity for there to be greater collaboration between the County and nonprofit organizations to provide better community education resources about homeowner/tenant's rights, housing assistance, and community services. Many organizations have already compiled this information; however, it is difficult for people to know where to go for information about services and is rarely provided in multiple languages (Spanish, Hmong, Arabic). Some stakeholders also expressed that it would be beneficial to have a one stop shop to connect people to agencies and programs.
- **Antidisplacement Efforts.** Some stakeholders mentioned occurrences of residential areas being redeveloped into commercial uses without replacing the residential units elsewhere, leading to the displacement of existing residents and a reduction in the County's housing stock. There is an opportunity for the County to implement a program/policy that conversion to nonresidential uses or mitigates the impact on communities.

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

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

3.14.3 General Plan and Housing Element Update Survey

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

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

- **Housing Needs:** The highest priority housing need identified by respondents was lower-cost housing for all, including both rental and for-sale housing units. Respondents identified affordability of housing as the most urgent housing issue in the County by a significant margin, followed by the availability of housing, and homelessness.
- **Desired Housing Types:** Respondents identified co-housing (housing with an emphasis on community living, e.g., shared open spaces, or kitchens) as the most likely housing type to be successful in unincorporated Stanislaus County, followed by larger, custom homes and single-room occupancy housing units (small apartment that may have a common kitchen).
- **Desired Housing Location:** Respondents identified areas near public transit stops, employment, and shopping centers as the most suitable for new housing development.

- **Housing Services:** The highest priority needs for housing services were down payment assistance for lower-income, first-time homebuyers, and home repair assistance for lower-income homeowners. The highest priority needs for fair housing services include landlord/tenant counseling and education/information on tenant rights.
- **Housing Quality:** The most common housing quality issue among respondents was lack of energy efficiency and housing structural or maintenance issues.
- **Homelessness:** Many respondents identified concern regarding the prevalence of homelessness and associated issues with crime, noise, and sanitation. In addition, respondents identified a need for housing and services for persons experiencing homelessness.

The following issues were also identified by respondents:

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

3.15 Other Relevant Factors

Other relevant factors that have not been previously discussed relating to fair housing include language barriers, access to homeownership, lack of services and infrastructure in rural, lower-income communities, and the availability and access to housing choice vouchers in Stanislaus County.

3.15.1 Language Barriers

According to ACS estimates, 46 percent of the population of Stanislaus County over the age of five speak a language other than English at home and 18 percent speak English less than “very well.” Approximately 36 percent of residents speak Spanish at home (37 percent of whom speak English less than very well), five percent speak other Indo-European languages at home (33 percent of whom speak English less than very well), three percent speak Asian/Pacific Island languages at home (67 percent of whom speak English less than very well), and three percent speak another language at home (42 percent of whom speak English less than very well).

As identified during public feedback, many migrant farmworkers speak a language other than English (many of whom speak Spanish) and report that they do not speak or read English well. Migrant farmworkers are not necessarily accounted for in ACS estimates, indicating that a larger percentage of the County’s population may speak English less than “very well” compared to the reported census data. Information on housing programs and resources are primarily available in English which limits accessibility for migrant farmworkers who do not speak or read English well. Where the County does provide housing services, materials are translated in accordance to federal and state funding requirements and the County’s website has a “translate” option for all of its static information.

3.15.2 Access to Homeownership

To analyze access to homeownership, the 2018 Home Mortgage Disclosure Act (HMDA) is assessed to determinate the outcome of loans through demographics. As analyzed in Chapter 4, Housing Constraints, about 16,000 loans originated in Stanislaus County, with nearly 11 percent of them from unincorporated County. Out of the areas assessed, unincorporated County cumulatively saw the

lowest approval rate of 54.4 percent. In assessing loan applicants by income in Stanislaus County, most individuals fell into the upper income bracket with very few lower-income applicants. The HDMA also assess loan outcomes by race, in which Stanislaus County's Black/African American, American Indian/Alaska Native, and Hispanic/Latino residents were underrepresented in the number of applications filed. Denial rates were also higher for those racial and ethnic groups. Overall, the data analyzed in Chapter 4, Housing Constraints, determines that there is a degree of correlation between race, ethnicity, and income on lending outcomes, and that discrepancies exist in Stanislaus County.

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

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

The County's Disadvantaged Unincorporated Communities Report also identified a lack of infrastructure and public services in certain unincorporated communities. The DUCs discussed in the report generally lacked street improvements (curbs, gutters, sidewalks), older or insufficient utility infrastructure in need of repair or updates, limited transit access, and limited police and fire protection services. These communities consist of mainly lower-income households and do not have the funds to implement infrastructure improvements.

In August of 2011, the County Board of Supervisors (the Board) took several actions to guide infrastructure improvements and to support annexation of unincorporated pocket areas to various cities in the County. Those actions included approval of the Residential Neighborhood Infrastructure Project Ranking Criteria; adoption of a resolution supporting the annexation of unincorporated County residential pockets and islands within adopted city spheres of influence; and authorizing the negotiation and execution of an amendment of the Master Property Tax Agreement eliminating exceptions to the Agreement for the "North Airport area", "Robertson Road area", and "South Modesto area".

For residential neighborhood infrastructure projects funded with redevelopment and block grant funding, the Board action placed priority on funding those projects with public health and safety needs, which included a priority of the installation of sewer mainlines, and potable water systems. On March 28, 2017, the Board approved prioritizing the use of Community Development Block Grant (CDBG) funds allocated to unincorporated Stanislaus County to lower-income areas for sewer infrastructure projects. Prioritization was based on a sewer project prioritization study developed by Public Works, in conjunction with the Departments of Environmental Resources and Planning and Community Development. The prioritization study identified three sub-areas of West Modesto (Spencer/Marshall, Rouse/Colorado, and Beverly/Waverly) as the top ranking neighborhoods in need of sewer improvements. Since March 2017, the West Modesto Sewer Infrastructure Project,

comprised of the three sub-area neighborhood, have been the focus of the County's use of CDBG funding.

In 2019, Stanislaus County began to develop cost estimates for public improvements consistent with city standards. The County also prepared an expanded analysis of key criteria to prioritize urban pockets and islands for annexation, analyzing 41 individual urban pocket areas (referred to as County Pockets/Islands), predominantly around the cities of Modesto, Turlock, Ceres, and Riverbank. Since then, one area has fully annexed (area 14 – Hatch/ Carpenter/ Whitmore) and one area has been partially annexed (area 11 – Whitmore/ Flamingo). The study evaluated criteria such as cost of improvements; right-of-way feasibility constraints; public benefit; supplemental funding sources; benefits to disadvantaged communities; regional equity; sewer only improvements or full improvements; and community support for maintenance of certain improvements in its ranking.

In 2020, development of a supplemental analysis began for the thirteen County Communities – Cowan Tract, Crows Landing, Del Rio, Denair, East Oakdale, Grayson, Hickman, Keyes, Knights Ferry, Monterey Park Tract, Salida, Valley Home, and Westley. A preliminary analysis revealed infrastructure needs of the County Pockets/Islands and County Communities at an estimated cost of \$395 million and \$141 million respectively, for a total estimated cost of \$536 million. The estimates have since been adjusted to \$576 million and \$131 million, for a total estimated cost of \$707 million, to reflect increased inflation.

On May 18, 2021, the Board approved various strategic priorities for the use of \$90 million of the \$107 million in American Rescue Plan Act of 2021 (ARPA) funding allocated to Stanislaus County. Of this amount, \$50 million was assigned to community infrastructure in unincorporated pockets and islands or County communities. On September 20, 2022, the Board approved the final recommendations on infrastructure projects to utilize ARPA funding in the following areas³⁰:

- District 1 – Riverbank - Topeka/Santa Fe – Awarded \$5,600,000 (37 parcels totaling 23 acres). Proposed to fund curb, gutter, sidewalk, street lighting, storm drainage, sewer, and water meter and lateral improvements.
- District 2 – Turlock – Kenwood/Starr – Awarded \$4,700,000 (52 parcels totaling 16 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements.
- District 3 – Modesto - Riverdale Park Tract –Awarded \$10,600,000 (206 parcels totaling 52 acres). Proposed to fund curb, gutter, sidewalk, storm drainage, and sewer improvements. However, due to limited funding which of these improvements and where is pending further direction. City of Modesto has plans to upgrade the water system.
- District 4 – Modesto – Rouse/Colorado – Awarded \$10,000,000 (382 parcels totaling 154 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements. However, due to limited funding which of these improvements and where is pending further direction. The Planning and Community Development Department has CDBG funds and Public Works is pursuing a State Water Board Grant to fund construction of sewer mainlines, laterals, and on-site connections in this area.
- District 4 - Ceres – Herndon – Awarded \$2,200,000 (362 parcels totaling 259 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements. However, due to limited funding which of these improvements and where is pending further direction.

³⁰ Stanislaus County. 2022. <https://www.stancounty.com/bos/agenda/2022/20220920/DIS01.pdf>

- District 5 – Modesto – Bret Harte – Awarded \$10,000,000 (1200 parcels totaling 351 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements in the northeastern area of the neighborhood. The City of Modesto is partnering with County Public Works Department to include upgrading of the water system.
- District 5 - Modesto - Parklawn – Awarded \$6,900,000 (330 parcels totaling 90 acres). Proposed to fund curb, gutter, sidewalk, and storm drainage improvements. The City of Modesto is partnering with County Public Works Department to include upgrading of the water system.

3.15.4 Prevalence of Low-Resource Areas

Large portions of Stanislaus County consist of low-resource areas, particularly in southwestern parts of the County, south of the City of Patterson, and areas in and surrounding the cities of Modesto, Turlock, and Ceres. In addition, the County's population is concentrated along the major highways (Interstate 5 and Highway 99) which are also surrounded by low-resource areas. Modesto, Turlock, and Ceres are the three largest cities in the County by population and as such have well established public infrastructure and public services. These cities are also located along Highway 99 which allows for the transfer of goods and people throughout the County and region.

Many unincorporated communities are located in low-resource areas near the cities of Modesto, Turlock, Ceres, and Patterson. While categorized as low-resource due to high pollution burden and low economic outcome scores, these areas also have access to infrastructure, services, and employment opportunities and typically have higher access to transit with bus stops and shuttle service that connect unincorporated communities to more urban areas. Lower-income housing in unincorporated parts of the County is concentrated in these low-resource areas because they have access to existing infrastructure, services, and transit. Proximity to established infrastructure and services lowers costs associated with development and in-turn lowers housing costs for residents, since the development can connect to existing water, sewer, electricity, internet, and circulation systems rather than establishing private systems.

3.15.5 Measure E and Measure X

Measure E, approved by Stanislaus County voters in 2007, is a local initiative that established a 30-year land use restriction that requires that any redesignation or rezoning of land in the unincorporated area from agricultural or open space use to residential use must be approved by a majority vote of the County voters at a general or special local election. While Measure E allows exceptions for lower-income housing under some circumstances and farmworker housing, only 10 acres of land per year for moderate and above moderate housing may be redesignated without a Measure E vote. Measure E also requires findings to allow exempt rezoning, including finding that there are no other sites available to meet the County's housing need. As discussed in Chapter 4 Housing Constraints, Measure E could be a constraint to housing as it provides additional barriers to housing development that can contribute to limited supply and thereby increase the cost of housing. However, Measure E has not been a constraint to development previously and it does include provisions that exempt the public vote requirement if the County's RHNA needs for lower-income cannot be met. The Housing Element recognizes this as an option if the land identified for rezone fails. The County has conducted a review of Measure E and has identified infrastructure opportunities to support residential development on Measure E impacted lands within the City of Modesto's SOI and within the existing community plan areas of Denair and Keyes. In addition, the County will implement Program 3-2, which includes regular review of Measure E to evaluate its impact on the County's ability

to meet its housing needs. As part of this program, the County will develop a list of Measure E lands that could be utilized to meet housing needs.

Measure X, a local initiative approved by the voters of Stanislaus County in 1990, requires that urban development on residential parcels created after July 13, 1990, establishes primary and secondary sewage treatment. Measure X creates a stricter requirement for wastewater treatment than the California Building Code. While these requirements were deemed necessary to protect the health and well-being of residents in the unincorporated part of the County, they also increase costs associated with housing development. Additional costs are generally passed on to homeowners and renters of market rate housing, which can exacerbate cost burden. For affordable housing projects, additional costs associated with Measure X requirements can be an impediment, as they are adding to the financial challenge of development.

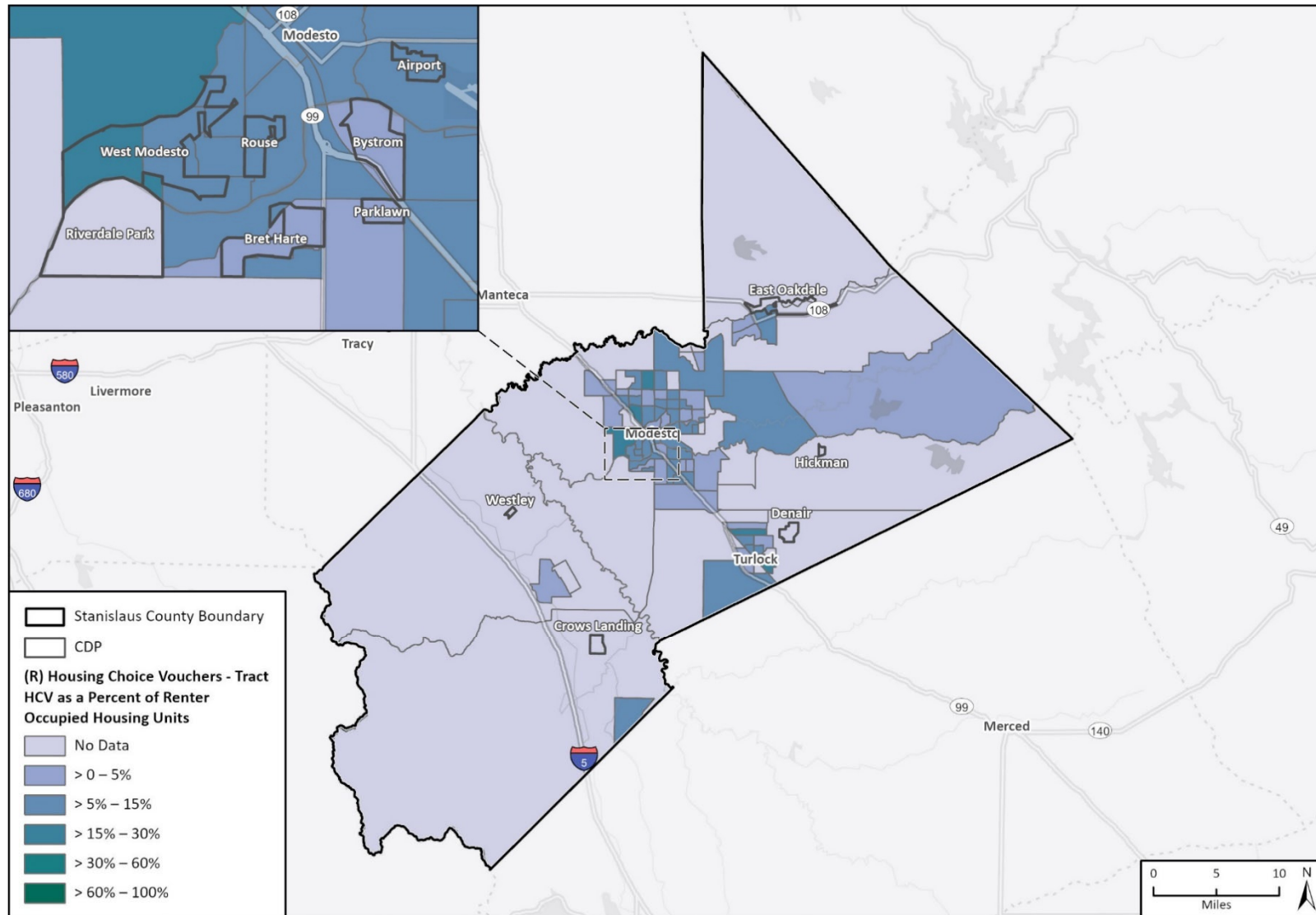
Both Measure E and Measure X create additional requirements that could be barriers for housing development and result in additional costs to develop housing. These additional costs and requirements not only discourage new housing development but also can result in increased housing costs for residents which can increase the rate of housing problems such as cost burden and overcrowding.

3.15.6 Housing Choice Vouchers

The Housing Authority within the County provides Housing Choice Vouchers (HCV) to residents and will continue to seek opportunities to increase rental assistance and reduce overpayment. Providing for economic development and small business assistance HUD estimates show that approximately 4,000 households received HCVs in Stanislaus County. As shown in Figure 3-60, the census tracts shown in Stanislaus County range from zero to 30 percent of renter occupied units using HCVs. The area with the highest percentage of households using HCVs is West Modesto.

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

Figure 3-60 Housing Choice Vouchers, Stanislaus County



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

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AFFH - County

3.16 Sites Inventory

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

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

3.16.1 Opportunity Areas

HCD/TCAC opportunity maps identify areas throughout the state that support positive economic (low poverty, high employment, high median household income), educational (reading and math proficiency, high school graduation rates, low student poverty rates), and environmental outcomes (low exposure to pollution). The HCD/TCAC opportunity areas map rank census tracts from Highest Resource to Low Resource based on these characteristics. A census tract with a designation of High Resource indicates that the census tract has strong educational and economic opportunities for current and future residents.

Locally, in the unincorporated areas of Stanislaus County, areas of high segregation and poverty and low resource areas (concentrated in southwestern and central part of the county) overlap with areas that are predominantly Hispanic/Latino, and areas with lower median household incomes and some of the highest poverty rates in the County. Moderate-resource areas are located in the southwestern CDPs of Westley and Grayson, and half of Salida. High-resource areas can be found in the northern part of Salida and Keyes, and the western and southwestern portions of Denair. Areas with the highest resources are scattered throughout the county but are found in the northwestern CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, as well as Hickman.

Figure 3-61 through Figure 3-74 show the housing opportunity sites in each CDP by TCAC-designated resource area. The housing opportunity sites are designated by income category—whether the sites could accommodate housing appropriate for low-, moderate-, or above moderate-income households. The “appropriateness” of sites for various affordability levels is dictated by state housing element law and HCD guidance and includes site characteristics such as the size and allowable density of a site, its realistic capacity, availability of sewer and water service, and existing use(s). More information about the sites and income designations is available in Chapter 5, Housing Resources.

The location of housing opportunity sites for each income category were chosen to facilitate the development of mixed-income neighborhoods and to increase the availability of affordable housing in proximity to transit, retail, and other services. However, many of the housing opportunity sites are in low-resource areas and areas of high segregation and poverty (66 percent of the proposed housing units), due to the availability of vacant and underutilized parcels in these areas. While the majority of low- and very low-income units projected in the Sites Inventory are in low-resource tracts, these tracts have higher access to goods and services, due to their proximity to urban services in the City of Modesto. As shown in Table 3-20, approximately 44 percent of anticipated units are located in South Modesto CDPs. Units were identified in these areas as a result of a Sites Inventory analysis and supporting development trends that concluded that this area has the highest likelihood of residential development for all income categories, specifically lower-income units.

Table 3-20 Sites Inventory by Census Tract Characteristics

Neighborhood/CDP	Number of Existing Households	Census Tract Number	Sites Inventory Capacity + RHNA Credit Projects (Units)				AFFH Indicators					
			Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile	Median Income
Airport	486	6099002100	0	18	8	75	High Segregation & Poverty	58.4	21.8	1 Income Group Displacement	93.8	\$28,924
Crater Avenue Neighborhood		6099002301	0	0	9	89	Low Resource	62.9	22.9	Lower Displacement Risk	90.0	61,917
Bret Harte	1,259	6099002402	481	87	19	89	Low Resource	66.8	15.7	At Risk of Displacement	79.6	34,617
Parklawn	236	6099002501	0	14	3	87	Low Resource	55.2	6.6	Lower Displacement Risk	92.9	38,346
Crows Landing	121	6099003400	0	0	5	74	Low Resource	24.7	7.7	Lower Displacement Risk	90.4	50,125
Del Rio	490	6099000501	0	0	131	29	High Resource	26.5	1.6	Lower Displacement Risk	95.1	95,036
Denair	1,580	6099003604	127	39	93	44	High Resource	51.5	3.5	Lower Displacement Risk	69.8	106,726
Diablo Grande	361	6099003300	0	0	112	73	Moderate Resource	35.9	10.7	Lower Displacement Risk	96.5	81,895
Empire	1,343	6099002002	17	46	43	61	Low Resource	38.7	4.2	At Risk of Displacement	89.3	47,967
Grayson	276	6099003300	0	0	6	87	Moderate Resource	35.9	10.7	Lower Displacement Risk	96.5	81,895
Hickman	211	6099002901	0	0	19	43	Highest Resource	17.7	3.1	Lower Displacement Risk	75.1	79,474
Keyes	1,704	6099003002	58	38	18	75	High Resource	40.0	7.7	Lower Displacement Risk	78.7	56,579
Bystrom	1,085	6099002302	77	55	19	84	High Segregation & Poverty	72.6	22.7	1 Income Group Displacement	88.5	36,102
North Ceres (Encompasses Ceres-River Road neighborhood)		6099002701	0	0	5	57	Moderate Resource	49.7	0.3	Lower Displacement Risk	44.2	77,269
North Ceres (Encompasses Ceres-Herndon and Hatch/Stonum neighborhoods)		6099002702	20	2	2	80	Low Resource	53.9	15.9	Lower Displacement Risk	72.9	55,607
East Oakdale	1,122	6099000101	0	0	11	17	Highest Resource	27.9	2.2	Lower Displacement Risk	72.3	87,692
		6099000102	0	0	104	26	Highest Resource	26.0	1.6	Lower Displacement Risk	90.8	104,010
		6099000203	0	0	46	29	Moderate Resource	57.9	8.5	Lower Displacement Risk	87.0	64,375
Salida	4,078	6099000501	0	18	3	33	High Resource	26.5	1.6	Lower Displacement Risk	77.8	95,036
		6099000510	0	5	2	73	Moderate Resource	54.3	4.4	Lower Displacement Risk	77.8	62,253
		6099002503	76	8	9	68	Low Resource	49.8	10.0	At Risk of Displacement	77.5	49,810
South Ceres (Encompasses Laurel Central neighborhood)		6099003906	0	7	3	64	Low Resource	60.2	4.6	At Risk of Displacement	47.1	34,500
Valley Home	81	6099000101	0	0	4	33	Highest Resource	27.9	2.2	Lower Displacement Risk	72.3	87,692
West Modesto (Encompasses Elm/Emerald and Beverly/Waverly neighborhoods)	1,559	6099001500	0	31	9	68	Low Resource	52.5	12.2	Lower Displacement Risk	92.9	71,290
West Modesto (Encompasses California/Biggs, Spencer/Marshall neighborhoods)		6099001601	248	102	17	87	High Segregation & Poverty	63.7	19.7	At Risk of Displacement	61.5	48,563

Neighborhood/CDP	Number of Existing Households	Census Tract Number	Sites Inventory Capacity + RHNA Credit Projects (Units)			AFFH Indicators						
			Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Over-crowded Households	Displacement Sensitivity	Pollution Burden Percentile	Median Income
West Modesto (Encompasses Beverly/Waverly, Vernon, and Robertson Road neighborhoods)		6099001603	0	6	18	84	Low Resource	66.7	18.8	1 Income Group Displacement	67.7	55,461
Rouse (Encompasses Rouse/Colorado neighborhood)	507	6099002200	0	77	63	87	Low Resource	61.9	22.7	2 Income Groups Displacement	84.9	44,010
Total			1,104	553	781							
Source: California Tax Credit Allocation Committee (TCAC)/California Housing and Community Development (HCD), Opportunity Maps (2020); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019).												
*These CDPs are located between the City of Modesto and the City of Ceres and are collectively referred to as “South Modesto.”												
Table reflects census tract boundaries from 2010 Census.												

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

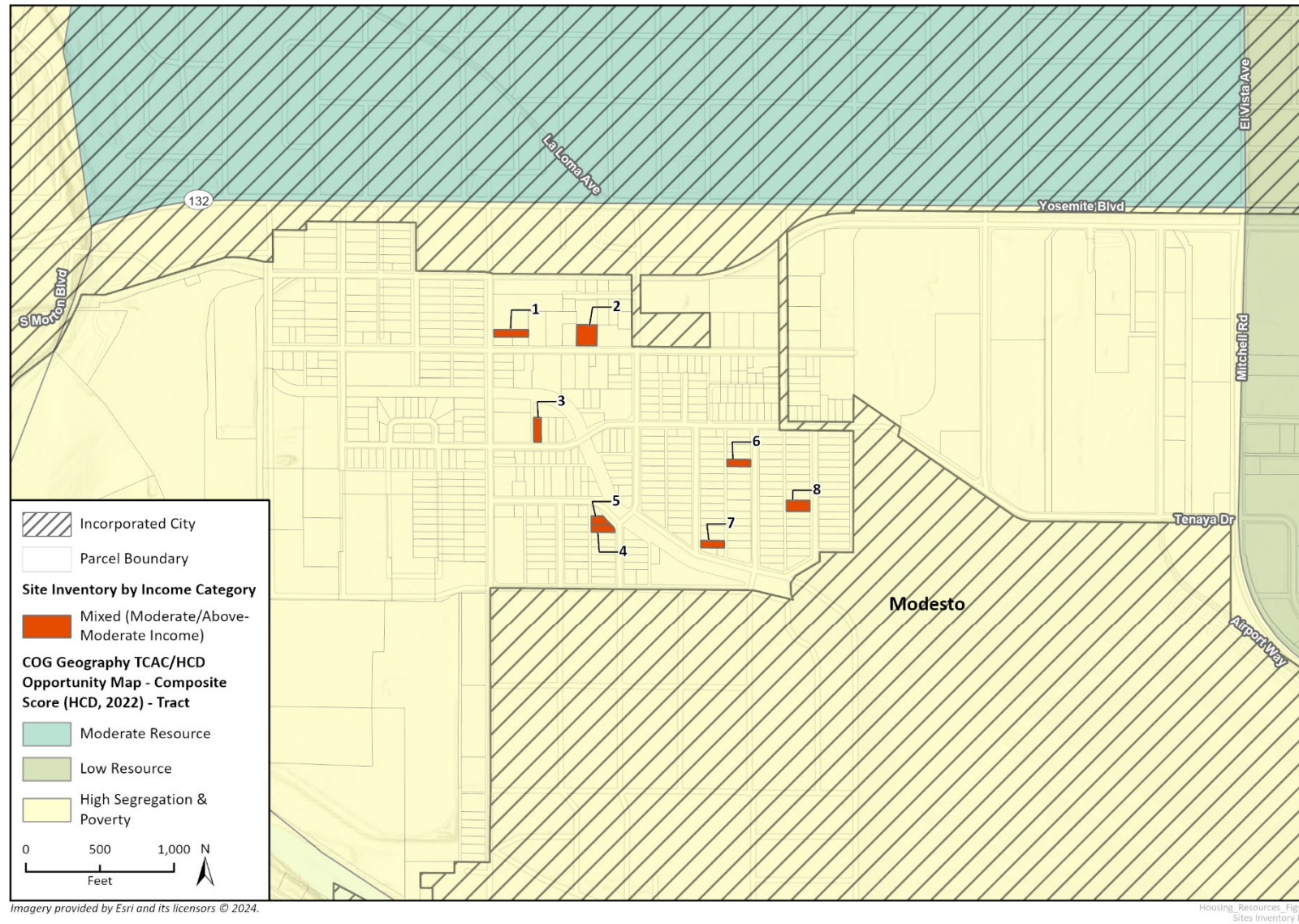


Figure 3-62 Sites Inventory, Bret Harte, TCAC Opportunity Areas

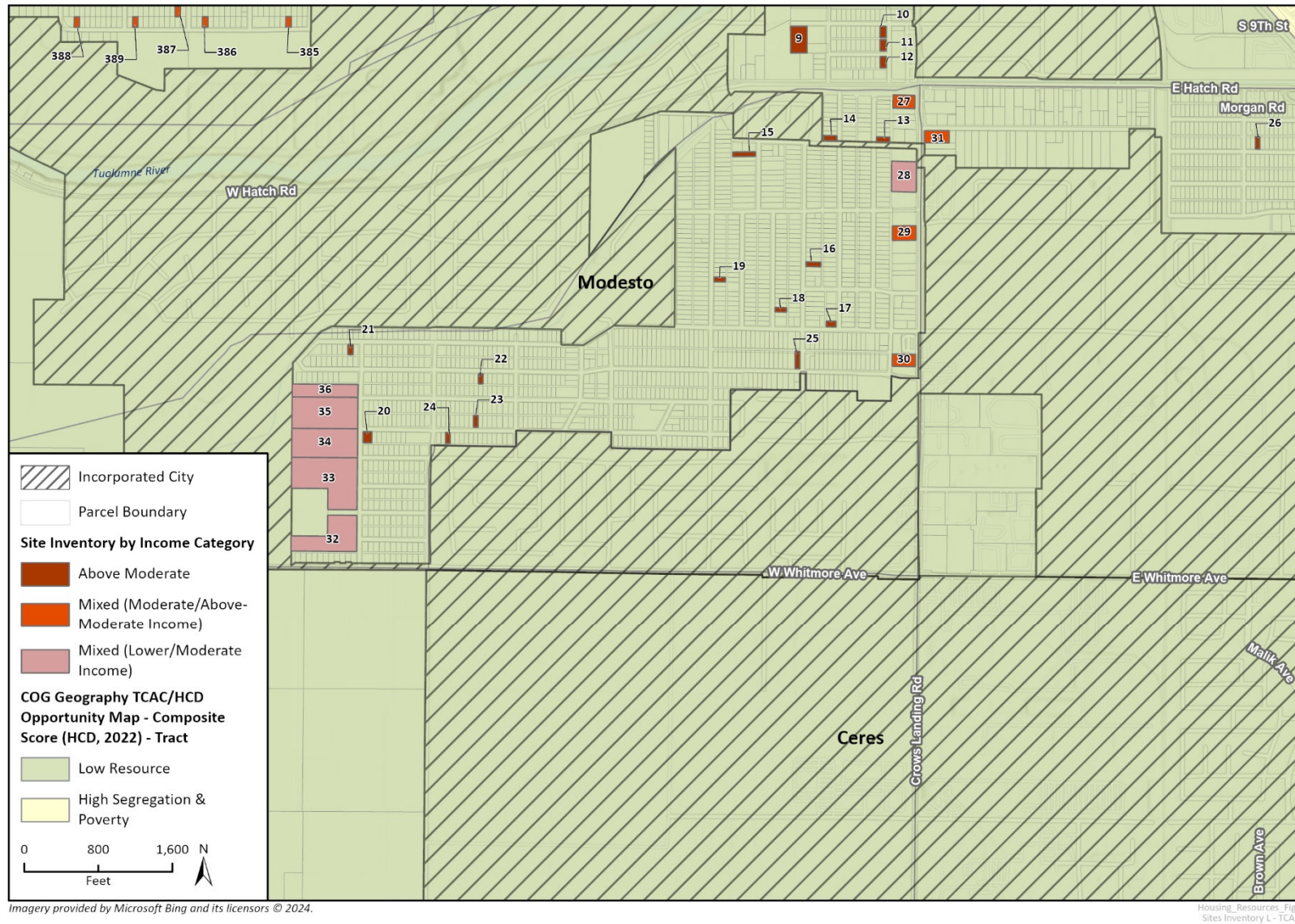


Figure 3-63 Sites Inventory, Crows Landing, TCAC Opportunity Areas

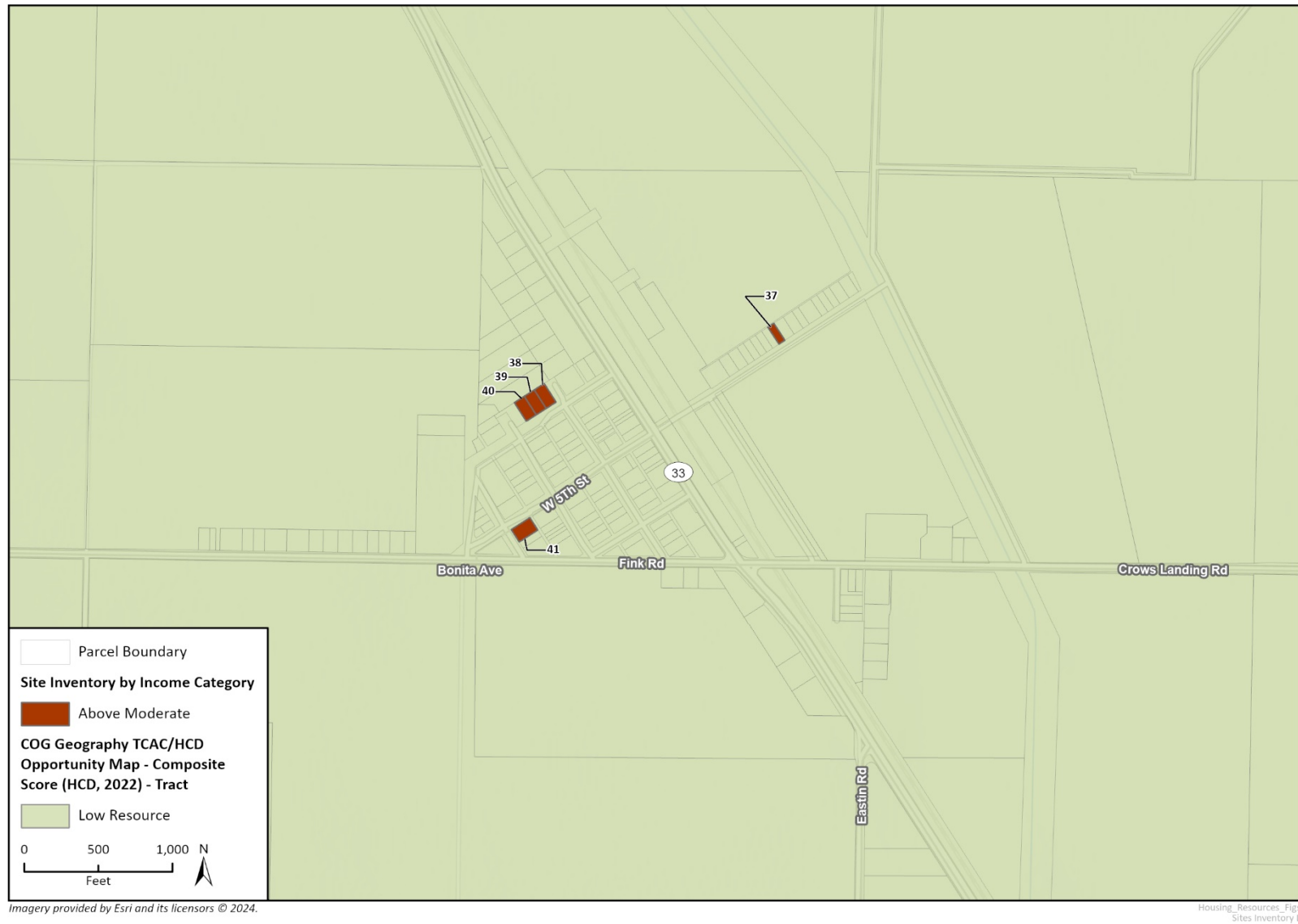


Figure 3-64 Sites Inventory, Del Rio, TCAC Opportunity Areas

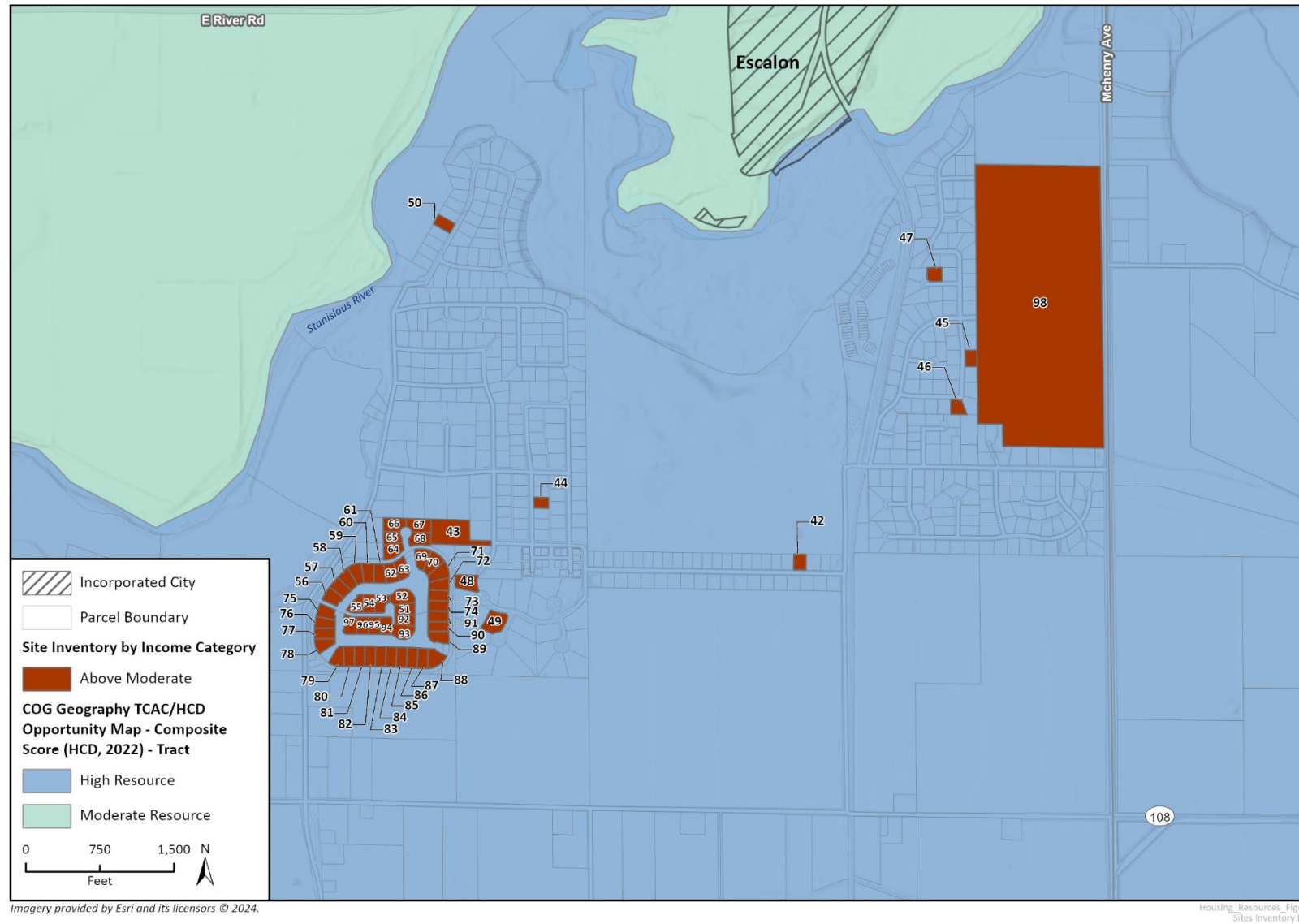


Figure 3-65 Sites Inventory, Denair, TCAC Opportunity Areas

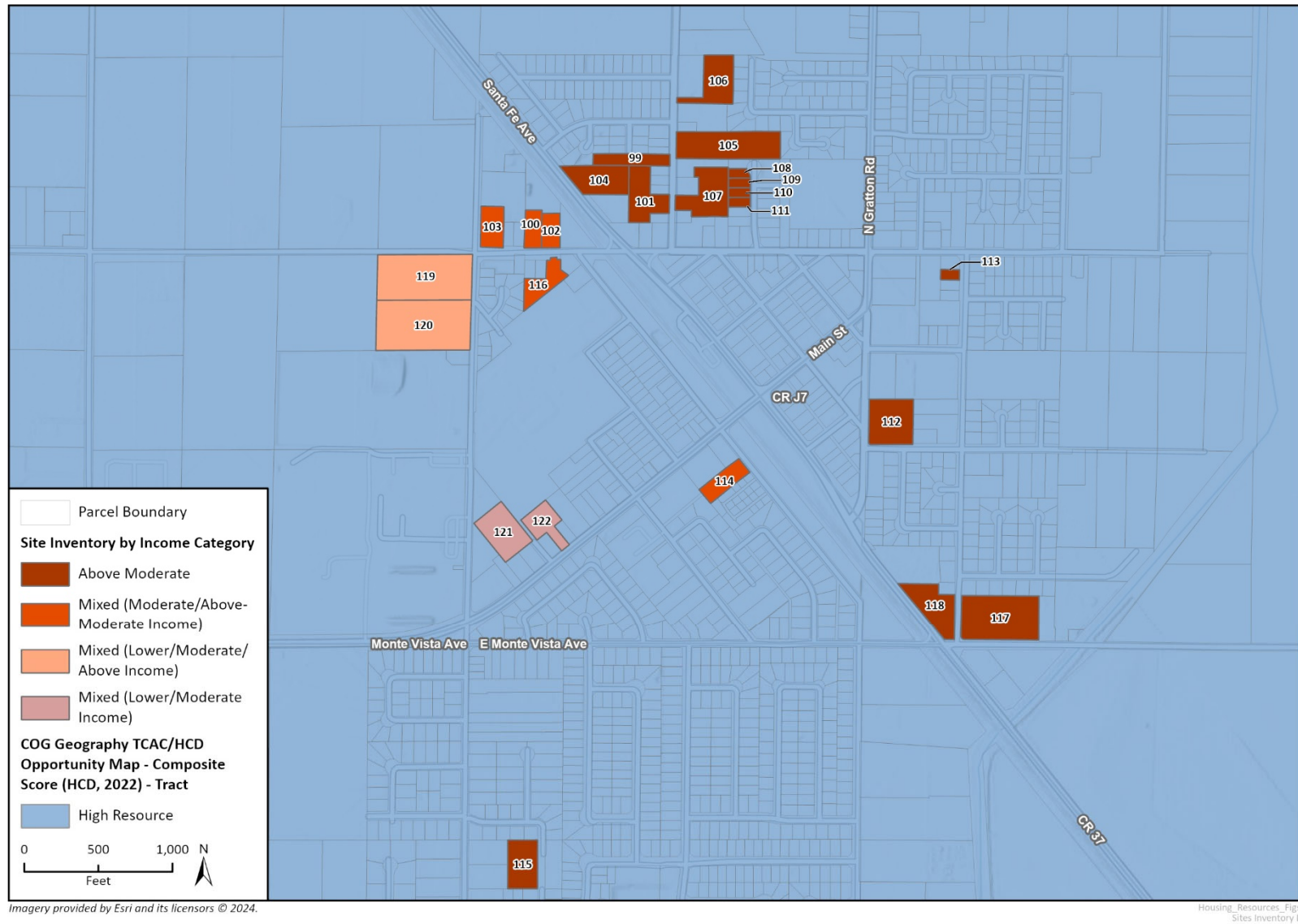


Figure 3-66 Diablo Grande Sites Inventory, TCAC Opportunity Areas

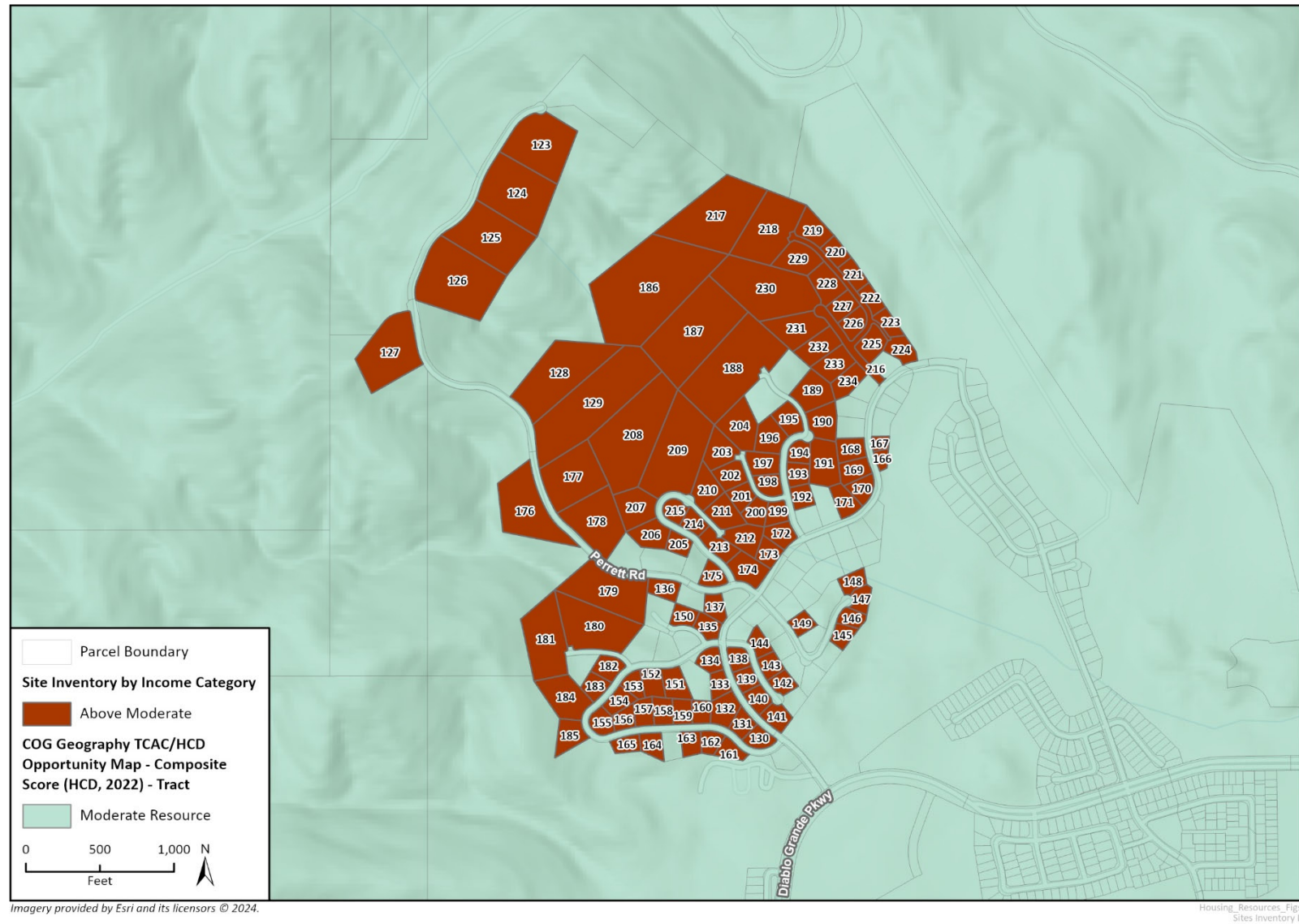


Figure 3-67 Grayson Sites Inventory, TCAC Opportunity Areas

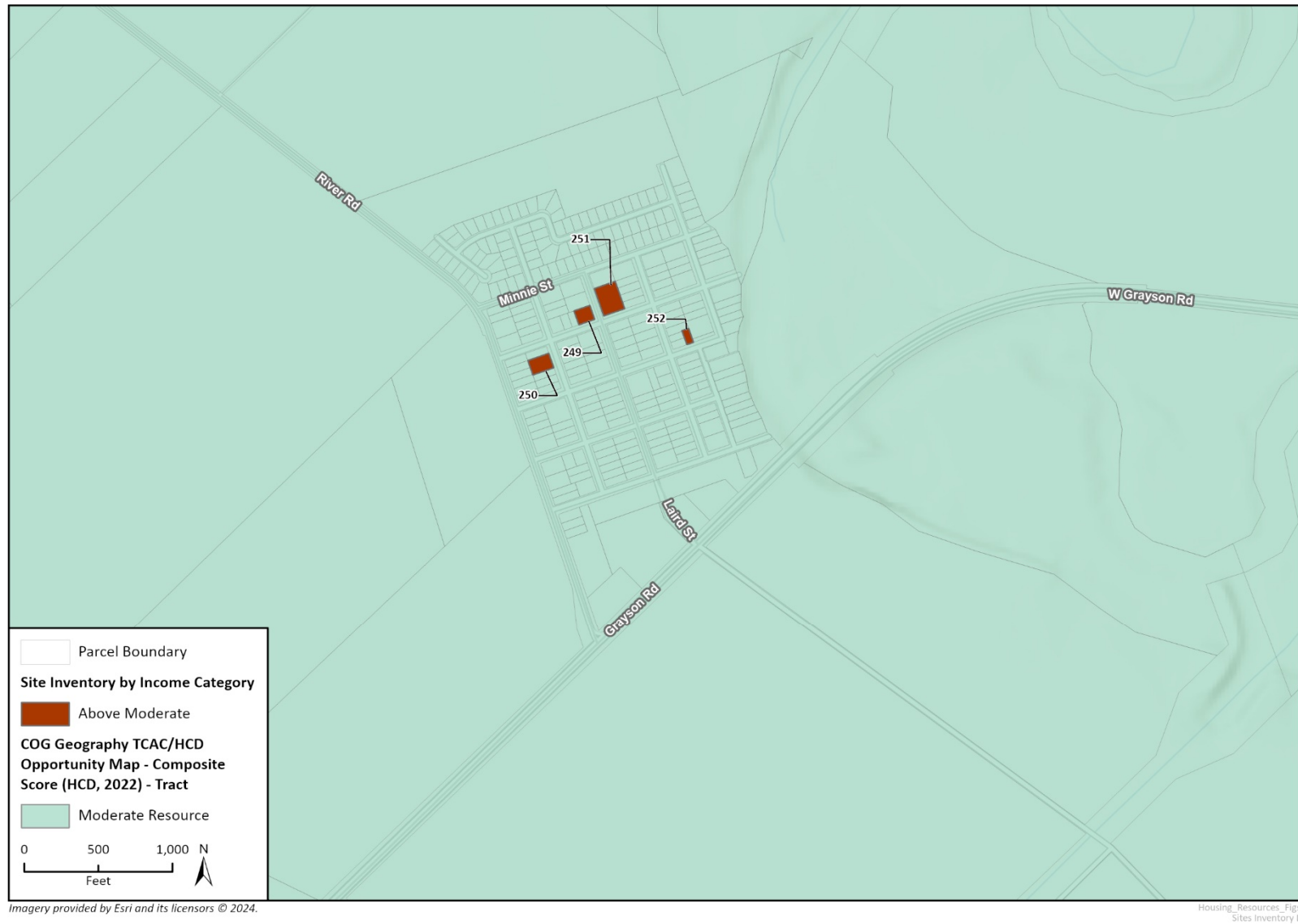


Figure 3-68 Sites Inventory, Hickman, TCAC Opportunity Areas



Figure 3-69 Sites Inventory, Keys, TCAC Opportunity Areas

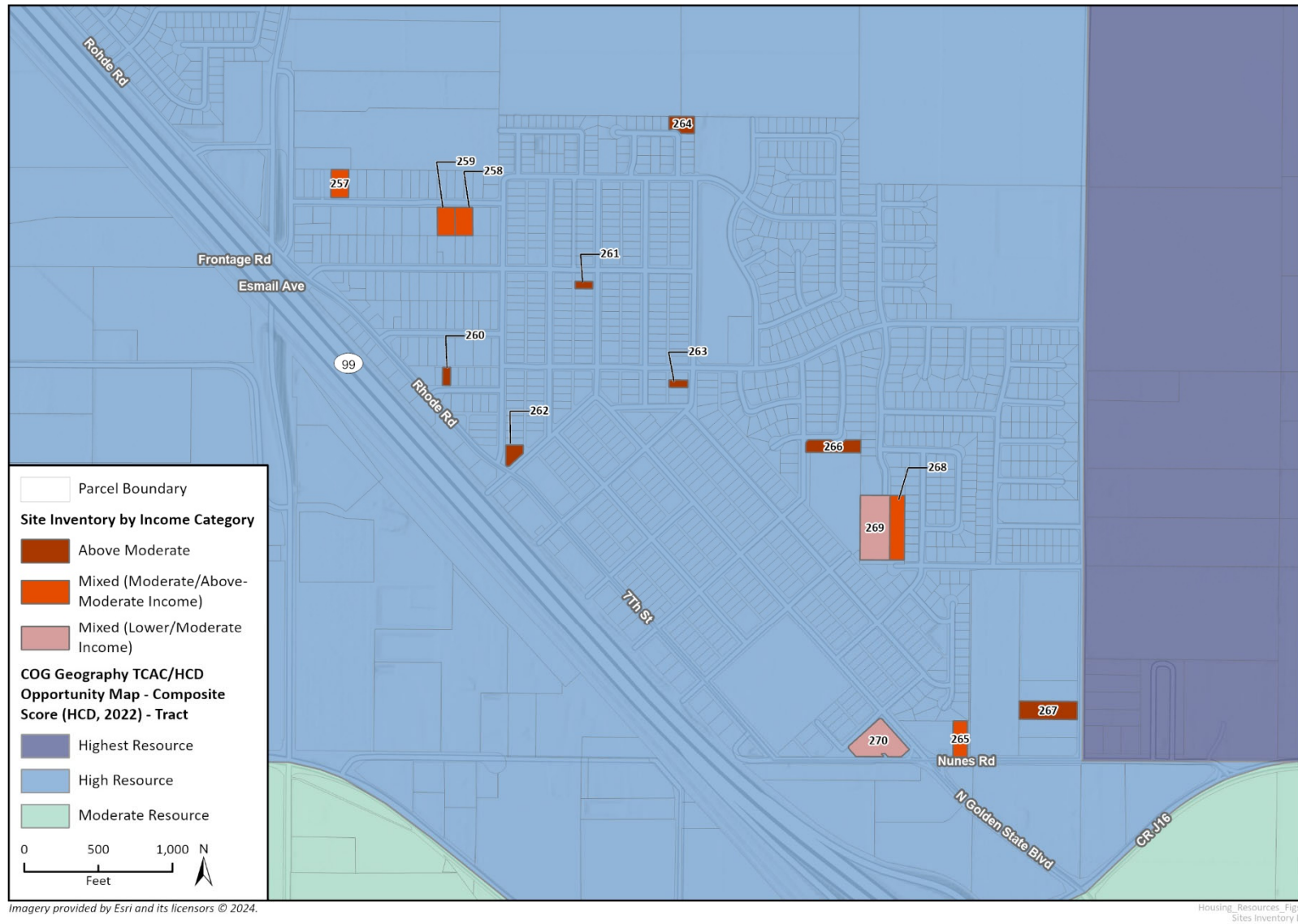


Figure 3-70 Sites Inventory, Empire, TCAC Opportunity Areas

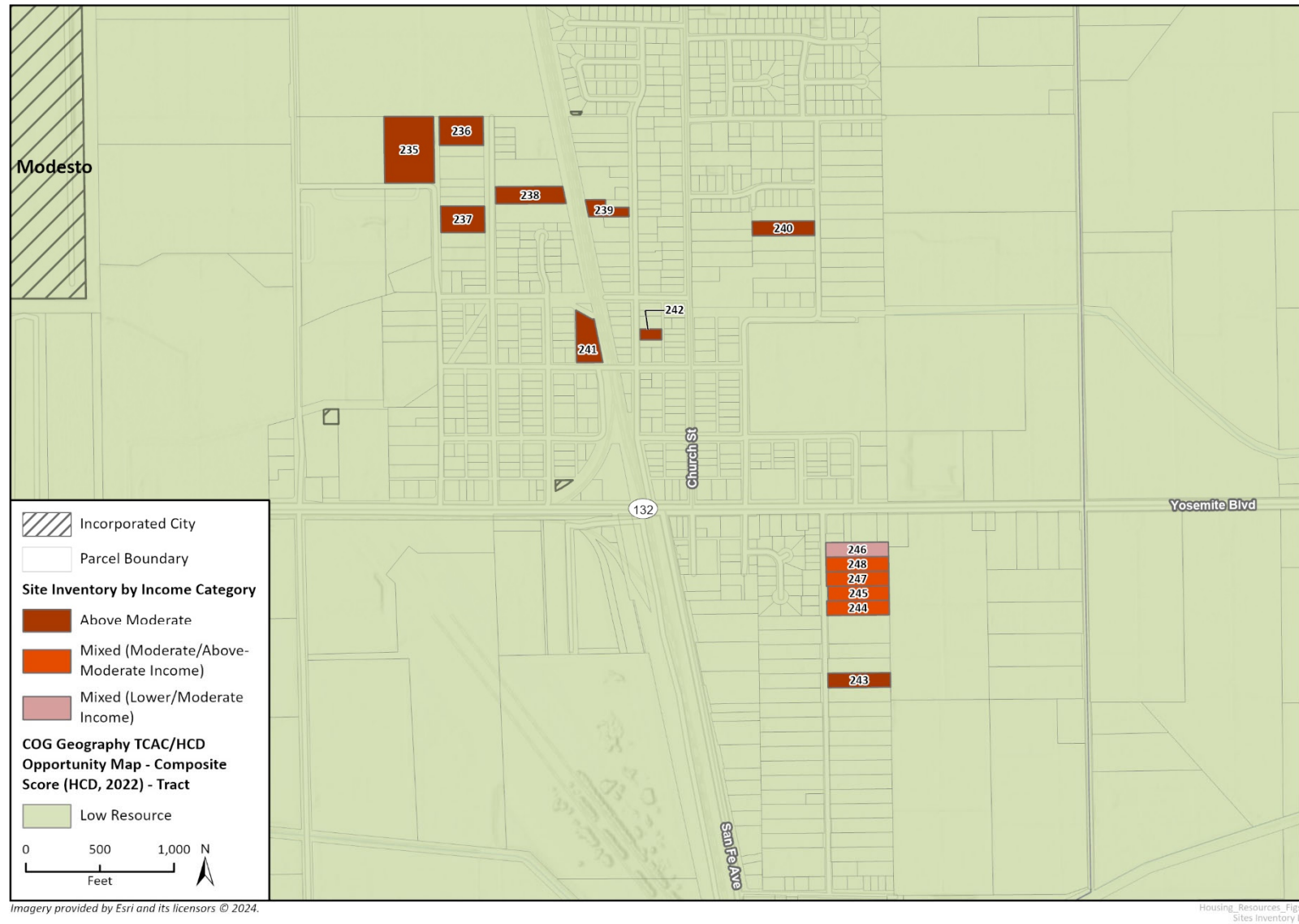


Figure 3-71 Sites Inventory, North Ceres, TCAC Opportunity Areas

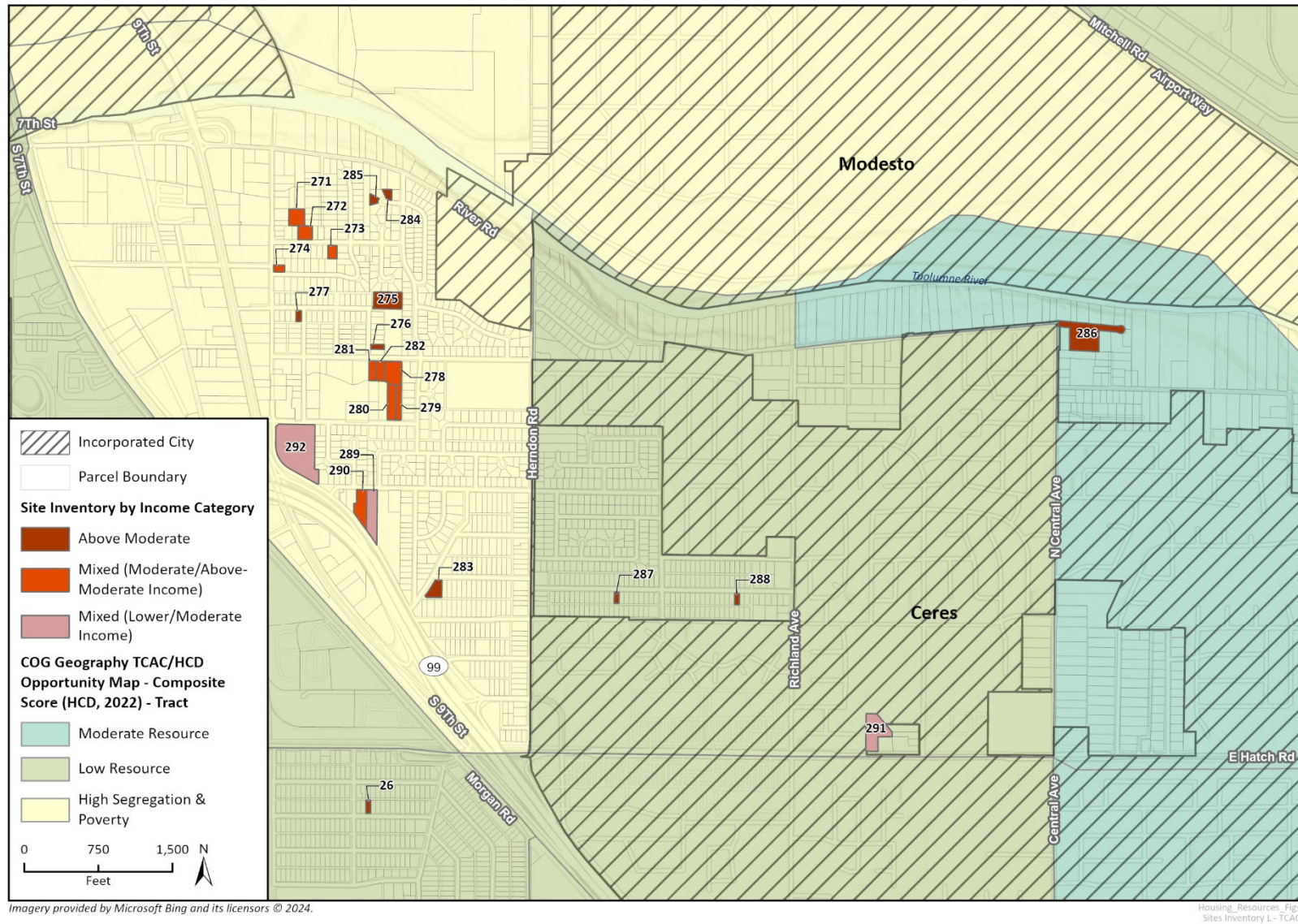


Figure 3-72 Sites Inventory, East Oakdale, TCAC Opportunity Areas

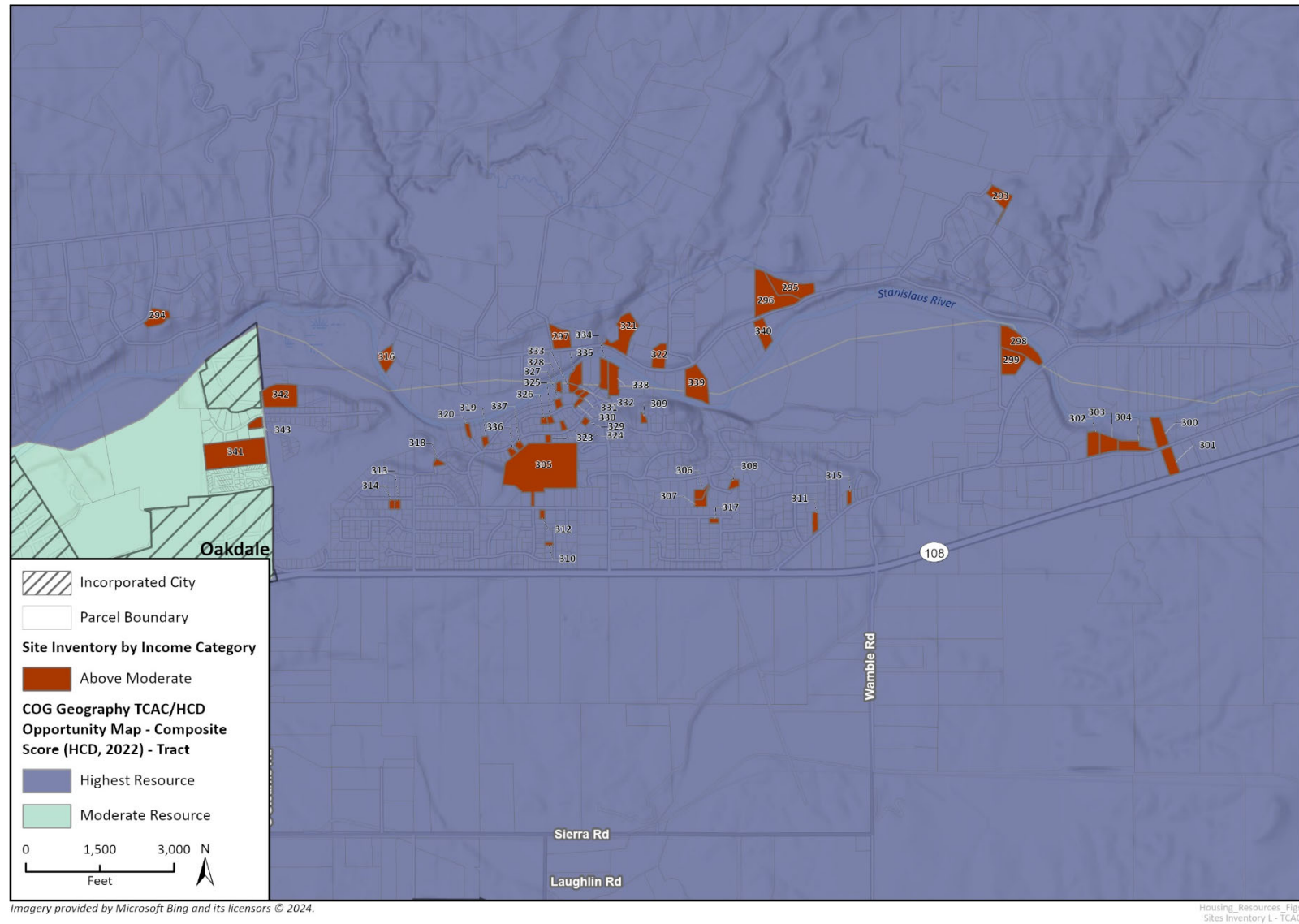
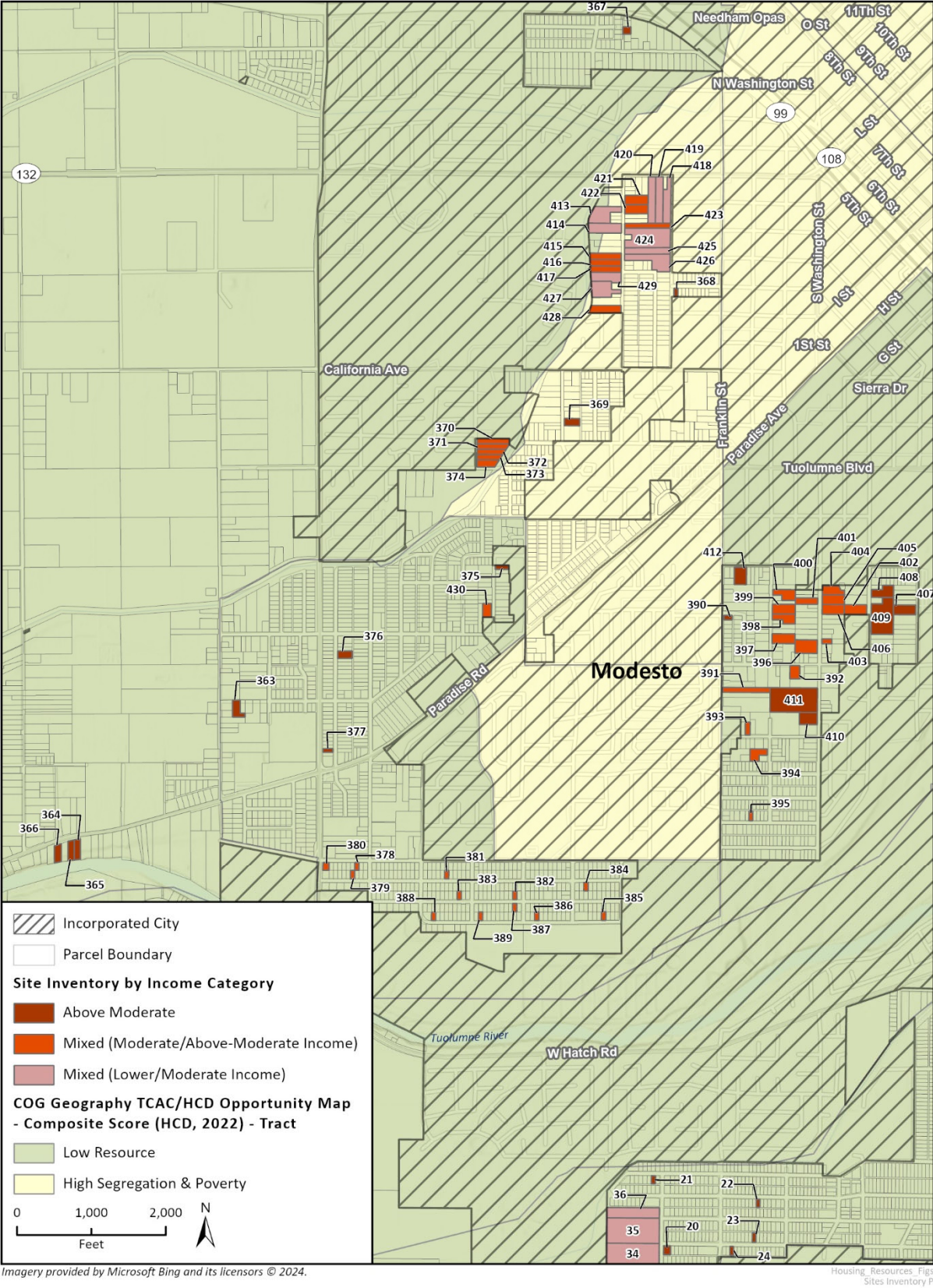


Figure 3-73 Sites Inventory, Valley Home, TCAC Opportunity Areas



Figure 3-74 Sites Inventory, West Modesto, TCAC Opportunity Areas



3.16.2 Improved Conditions

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

- 18 moderate-income and 8 above-moderate income units are located in Airport;
- 418 lower-income, 101 moderate-income, and 31 above moderate-income units are located in Bret Harte (South Modesto);
- 5 above moderate-income units are located in Crows Landing;
- 17 lower-income, 46 moderate-income, and 43 above moderate-income units are located in Empire;
- 97 lower-income, 57 moderate-income, and 26 above moderate-income units are located in North Ceres;
- 76 lower-income, 8 moderate-income, and 9 above moderate-income units are located in South Ceres;
- 7 moderate-income and 3 above-moderate income units are located in Turlock;
- 248 lower-income, 216 moderate-income, and 107 above moderate-income units are located in West Modesto.

The County has preliminarily studied five adjacent parcels as part of a feasibility analysis for the development of an affordable housing project in Empire; two of these parcels are currently included in the Sites Inventory. County staff has outreached to affordable housing developers and the property owners of the four parcels adjoining the County owned parcel, which was previously developed with a library and resource center and is now vacant. The Stanislaus proximity to Empire Elementary, Empire Head Start Center, Golden Valley Health Center, and the Empire Public Library make the sites identified in the inventory, along with the three adjacent parcels good candidates for grant funding aimed at affordable housing development.

Further development of moderate- and above moderate-income units in these low-resource areas would potentially improve conditions by encouraging a mix of household income levels. Areas with access to public utilities (water and sewer), access to transportation, and proximity to schools are best suited to higher-density developments. The County will continue to implement residential rehabilitation programs, affordable housing development incentives, anti-displacement actions, and utilize annual CDBG and HOME funds to improve conditions within low-resource and displacement-vulnerable census tracts shown on Figure 3-55.

3.16.3 Exacerbated Conditions

This AFFH analysis has shown that areas of low resource in Stanislaus County are more likely to have a predominant Hispanic/Latino population, a greater share of overcrowded households, and higher rates of poverty compared to neighborhoods in moderate and high resource areas. The sites located in the CDPs of Airport, North Ceres, and West Modesto each have sites in areas of high segregation and poverty. The Sites Inventory identified sites to accommodate all income levels in these areas with capacity for 345 lower-income, 291 moderate-income, and 141 above moderate-income housing

units. West Modesto has the highest poverty level with 38 percent of the population whose income in the past 12 months was below the poverty level. The sites located in this area can accommodate 248 lower-income, 216 moderate-income, and 107 above moderate-income housing units. By encouraging a mix of lower-, moderate-, and above moderate-income housing units, the Sites Inventory does not exacerbate conditions in vulnerable areas of the County, while still providing affordable housing where it is needed.

3.16.4 Unincorporated County Neighborhoods (Pockets/Islands) and County Communities

The Sites Inventory identifies housing opportunity sites within unincorporated County neighborhoods (pockets and islands within the sphere of influence of a city) and County communities (located outside a city sphere of influence). These areas have varying levels of public services and infrastructure improvements. While many have existing water service, most of these areas lack sewer service, curbs, gutters, sidewalks, and storm drainage systems. The County made an effort to concentrate housing opportunity sites in County pocket and island areas and County Communities that have existing public services and infrastructure or areas in which funding has already been allocated to make such improvements available and are anticipated to be completed during this housing element cycle.

Below is a description of the unincorporated neighborhoods (islands/pockets) located within a sphere of influence of a city included in the Sites Inventory, including how they were established, community resources, infrastructure improvements and needs, sites inventory information, and an AFFH data summary:

Airport

The Airport neighborhood is an unincorporated pocket located in the southern area of the city of Modesto, bordered by the Tuolumne River to the south, California State Highway 132 (Yosemite Boulevard) to the north, and the Beard Tract (which is developed with industrial uses) to the east, and E&J Gallo and Gallo Glass to the west. The city of Modesto is located east and north of the Airport neighborhood. In 1888, the Beard family recorded the Modesto Colony, which created 11,500 square foot lots, and the Del Este Subdivision in 1914, which also created 11,500 square foot lots, in the Airport neighborhood. In 1920 the Hermosa Tract created two-to-ten acre parcels west of Santa Cruz Avenue and the Modesto City-County Airport (MOD), located on the east side of the neighborhood, opened in 1920. The Airport neighborhood was further subdivided into 6,500 to 12,500 square-foot lots by subdivisions throughout the mid-1900s. Residents of the Airport neighborhood attend Orville Wright Elementary, located in the south end of the Airport neighborhood, or Wilson Elementary School, located north of Yosemite Boulevard, both located within Modesto's city limits. The Tuolumne River Regional Park and the Tuolumne River are located along the southern edge of the neighborhood and several local parks exist in the neighborhood including Mono, Oregon, and George Rogers parks. The Airport neighborhood has sewer and water connections. Sewer infrastructure was installed by the County in 2018, with CDBG and State Water Board funding. Sidewalks and bike path improvements were recently installed in portions of the Airport neighborhood through a combination of Measure L funding and Active Transportation Planning (ATP) grant funding. However, unincorporated areas of the neighborhood still lack complete curb, gutter, and sidewalks and the entire neighborhood lacks a storm drainage system.

The Sites Inventory identified eight vacant parcels totaling 1.88 acres which currently have the appropriate zoning to accommodate 18 moderate-income and eight above moderate-income units for a total of 26 units in the Airport neighborhood. Census Tract 2100, which encompasses the Airport

neighborhood, is an area of High Segregation and Poverty, with a pollution burden percentile of 93.8. Very low-income populations in this neighborhood are at-risk of displacement. The median income in this census tract is \$28,924 and 75 percent of residents identify as non-white, 58.4 percent of households are cost-burdened, and 21.8 percent of households are overcrowded.

Bret Harte (South Modesto)

The Sites Inventory groups together the Bret Harte, Crater, and Parklawn neighborhoods and the commercial corridor of Crows Landing Road into the “Bret Harte” area. This area is also known more largely as the South Modesto area. The Bret Harte area is an unincorporated area located along the south edge of the City of Modesto, south of the Tuolumne River, north of Whitmore Avenue, east of Carpenter Road, and west of Highway 99. The area lies with the City of Modesto’s LAFCO adopted Sphere of Influence and is bordered on the east and south by City of Ceres. There are several commercial corridors surrounding the Bret Harte area, including Crows Landing Road which runs north to south through the center of the area, and Morgan Road and S. 9th St. Which are located on the eastern boundary of the area. Additional details about neighborhoods included in the Bret Harte area are provided below:

Bret Harte

The Bret Harte neighborhood is generally located north of Whitmore Avenue, south of W Hatch Road, west of Crows Landing Road, and east of S Carpenter Road. It is named for the American poet and short story writer Bret Harte best known for his writings about the California Gold Rush. The neighborhood was subdivided into lots 5,500 to 9,500 square feet in size by the South Modesto Acres Tract No. 3 in 1940, the Frazier Home Tract in 1946, the Rutherford Tract in 1947, and the Fairview Tract in 1950. The neighborhood includes Fairview Park. Children living in the area attend various schools located within the City of Modesto (Fairview Elementary School; Hanshaw Middle School, and Bret Harte Elementary School). The Salvation Army Red Shield Community Center is located on the north boundary of the middle school, also inside the City of Modesto’s city limits. The Bret Harte neighborhood is in close proximity to the Crows Landing commercial corridor, located on the eastern boundary of the neighborhood, and has frequent public bus service along two routes which provide access to downtown Modesto where many services are located. Public water and sewer service is provided by the City of Modesto, which is proposed to be upgraded by the City. The Bret Harte neighborhood partially lacks curb, gutter, and storm drainage improvements. Sidewalks and bike lanes were recently installed by the County with a mixture of local Measure L funds and ATP Grant funds along Las Vegas Street, Glenn Avenue, and Butte Avenue. ARPA funding is proposed to fund additional curb, gutter, sidewalk, and storm drainage improvements in the northeastern area of the community. The Bret Harte Landscape and Lighting District covers the Bret Harte neighborhood and provides streetlights.

The Sites Inventory includes five vacant rezone parcels, comprised of 24.37 acres surrounding Fairview Park to be rezoned from R-1 to R-3 to accommodate 330 lower- and moderate-income units. The Sites Inventory also includes 11 vacant sites to accommodate 10 above moderate-income units on parcels that already have the zoning required for such development. Census Tract 2402, which encompasses the Bret Harte neighborhood, is a low resource area, with lower-income populations at-risk of displacement, and a pollution burden percentile of 79.6. The median income in this census tract is \$34,617, with 89 percent of residents identifying as non-white, 66.8 percent of renter households that are cost-burdened, and 15.7 percent of households that are overcrowded.

Crater

The Crater neighborhood is located north of Amador Avenue and Hatch Road, west of Crows Landing Road, and southeast of the Tuolumne River and the majority of the neighborhood is located north of W Hatch Road. The neighborhood was divided into 7,200 square foot lots by the South Modesto Acre Tract in 1940 and into 6,500 square foot lots by the Caruso Tract in 1951. The neighborhood is in close proximity to two commercial corridors, W Hatch Road and Crows Landing Road. Portions of the neighborhood have water, stormwater, curb, gutter, and sidewalk improvements. However, there is no maintenance district for the upkeep of these improvements and the neighborhood lacks public sewer service. The Bret Harte Landscape and Lighting District provides streetlights to the majority of the Crater neighborhood.

The Sites Inventory identifies four vacant parcels which already have the appropriate zoning to accommodate development of nine above moderate-income units. Census Tract 2301, which encompasses the Crater neighborhood, is an area of high segregation and poverty, with lower risk of displacement, and a pollution burden percentile of 93.8. The median income is \$61,917, with 89 percent of residents identifying as non-white, 62.9 percent of renter households that are cost-burdened, and 22.9 percent of households that are overcrowded.

Crows Landing Road

Crows Landing Road is a commercial corridor which runs through the center of the Bret Harte area, north to south. Portions of the Road are located within the City of Modesto and Ceres city limits and portions are unincorporated. The Sites Inventory includes one vacant site and four non-vacant rezone sites along Crows Landing Road to be rezoned from C-2 to C-1 to accommodate 86 lower- and moderate-income units on a total of 5.3 acres. The C-1 zoning district allows for high-density residential uses as well as a mixture of neighborhood commercial uses.

Parklawn

The Parklawn neighborhood is located south of E Hatch Road, west of Morgan Road, east of the Union Pacific Railroad, and north of E Whitmore Avenue. The Olympic Tract, recorded in May of 1946, created the Parklawn neighborhood, consisting of lots approximately 6,000 square-foot in size. Parklawn Park is located on the southern edge of the neighborhood. The community is surrounded by industrial development on the south, west, and east, the County Corp Yard and Haz Mat Drop Off to the east, and a commercial corridor along E Hatch Road. There is also residential development to the west and northwest and the Crows Landing Road commercial corridor to the west of the neighborhood. Parklawn has street lights, and public water and sewer but lacks curb, gutter, sidewalk, and storm drain improvements. The County has allocated ARPA funds to support curb, gutter, sidewalk, and storm drainage improvements in the Parklawn neighborhood. The City of Modesto is partnering with the County Public Works Department to upgrade the water system while other improvements along the road right of way are occurring.

The Sites Inventory includes one vacant site in this neighborhood which already has the zoning in place to accommodate one above moderate-income unit. Census Tract 2501, which encompasses the Parklawn neighborhood, is a low resource area, with a lower risk of displacement, and a pollution burden percentile of 92.9. The median income in this census tract is \$38,346, with 87 percent of residents identifying as non-white, 55.2 percent of renter households that are cost-burdened, and 6.6 percent of households that are overcrowded.

Other County pockets in the Bret Harte/South Modesto area, that do not have sites identified in the Sites Inventory, include the Flamingo and Modesto Flea Market neighborhoods which are zoned for commercial and industrial uses and the Olivero and Riverdale Park Tract neighborhoods, which are predominately residential areas, but which have infrastructure limitations such as a lack of public sewer, curb, gutter, sidewalk, street lighting, and storm drainage improvements. The City of Modesto is in the process of connecting the Riverdale Park Tract neighborhood to their municipal water service due to issues with the existing CSD system.

Empire

The Empire neighborhood is located on the east side of the City of Modesto, and the Beard Tract, south of Dry Creek, and north of the Tuolumne River, within the City of Modesto's SOI. Yosemite Boulevard (State Highway 132) is a commercial corridor running west to east through the center of the neighborhood and Santa Fe Avenue and the Burlington Northern Santa Fe Railroad runs north to south through the neighborhood. Empire is named indirectly for the original Empire City which had been situated on the opposite bank of the Tuolumne River, from where the present town is located, which operated as a ferry crossing and trading post during the gold rush. The early settlement, which had once been the Stanislaus County seat, became deserted with the decline of the river boat trade. The community along the river was destroyed and rebuilt two times before relocating to its current location near the Burlington Santa Fe Railroad, in 1908, when the railroad station and a few buildings were erected on the present site. The Empire neighborhood includes Empire Elementary, Empire Community Park and Pool, Empire Head Start Center, Empire Library and Teel Middle School, all located within the Modesto's city limits. Glick Middle School is located on the western edge of the community; and Johansen High School is located on the northwestern edge of the community, also within the City of Modesto. The Empire Migrant Labor Camp, operated by the Stanislaus Regional Housing Authority, which is also utilized as a cold winter emergency shelter for homeless families, is located on the southern side of the community. Bus stops are located along the Yosemite Boulevard and along Santa Fe Avenue and S Abbie Road, which provide transportation from Empire to Riverbank and along Yosemite Boulevard, providing transportation from the Downtown Modesto Transit Center to the City of Waterford. The City of Modesto provides water and sewer service to the community. The majority of the Empire neighborhood is lacking curb, gutter, sidewalk, and storm drainage improvements; however, some areas of the neighborhood do have such improvements. Stormwater improvements were constructed in 2011 using Redevelopment Agency funds, but the stormwater project was never completed due to the dissolution of redevelopment agencies by the State of California. The County has allocated Building Community Infrastructure Funds (BCIF) to the Empire Storm Drain Trunk Line project, which will fund a portion of the costs for design and construction of a storm drain trunk which will provide a positive flow outfall for the overall storm drain system in Empire.

The Sites Inventory proposes to rezone one vacant County-owned site and four non-vacant sites from R-A to R-3 in this neighborhood to allow for 17 lower-income, 46 moderate-income, and 8 above moderate-income sites (71 units total), on a combined total of 4.77 acres. The Sites Inventory also includes nine vacant and underutilized sites which already have the zoning in place to accommodate 35 above moderate-income units on 11.11 acres. Census Tract 2002, which encompasses the Empire neighborhood, is a low resource area, with lower-income households at-risk of displacement, and a pollution burden percentile of 89.3. The median income in this census tract is identified as \$47,967, with 61 percent of residents identifying as non-white, 38.7 percent of renter households that are cost-burdened, and 4.2 percent of households that are overcrowded.

North Ceres

The Sites Inventory groups together the Bystrom, Ceres-River Road, Hatch/Stonum, and Ceres/Herndon neighborhoods into the “North Ceres” area. The North Ceres area is an unincorporated area located mostly south of the Tuolumne River and the City of Modesto, east of State Highway 99, north of E Hatch Road, and west of Mitchell Road, within the SOI of the City of Ceres. Some of the North Ceres area receives water and sewer from the City of Modesto and others from the City of Ceres. The North Ceres area is served by two bus routes which connect the Downtown Modesto Transit Center, through the City of Ceres and Community of Keyes, to the City of Turlock. Additional details about the neighborhoods included in the North Ceres area is provided below:

Bystrom

The Bystrom neighborhood is located south of the Tuolumne River, east of S 9th Street and Highway 99, and west of Herndon Road. The Smee Tract developed five to 14 acre lots in the Bystrom neighborhood, east of the Union Pacific Railroad (previously the Southern Pacific Railroad), in 1904. In 1909, the Sunset Tract developed 14 to 19 acre lots on the eastside of the Bystrom neighborhood. The neighborhood was further subdivided into lots 5,900 to 11,000 square feet in size throughout the mid and late 1900s. The S 9th Street corridor, which is located on the western edge of the Bystrom neighborhood, is zoned General Commercial but is developed with uses that are more industrial in nature. E Hatch Road is located on the southern end of the neighborhood which is developed with a variety of commercial uses. Tuolumne Elementary School and Mancini Park are located on the eastern side of the Bystrom neighborhood. Portions of the neighborhood has public sewer and the majority of the neighborhood lacks stormwater, curb, gutter, and sidewalk improvements. However, the majority of the Bystrom neighborhood has public water and streetlights.

The Sites Inventory includes three non-vacant rezone sites in this neighborhood to be rezoned from R-A to R-3 and 15 vacant and underutilized sites in Bystrom, which can accommodate a total of 151 units. Census Tract 2302, which encompasses the Bystrom neighborhood, is an area of high segregation & poverty, with the very low-income population at-risk of displacement, and a pollution burden percentile of 88.5. The median income in this census tract is \$36,102, with 84 percent of residents identifying as non-white, 72.6 of renter households that are cost-burdened, and 22.7 percent of households that are overcrowded.

Hatch/Stonum

The Hatch/Stonum neighborhood is located at the northwest corner of E Hatch Road and Stonum Road, in the northern area of the City of Ceres, within the City of Ceres SOI. The neighborhood is made up of six residential parcels ranging from 0.16 to 4.26 acres in size which were not created by subdivisions, but rather by the deeding of land. Adkison Elementary is located north and the Howard Training Center, a center for persons with disabilities, is located just east of the neighborhood, both within the City of Ceres limits. The neighborhood is served with water and sewer but lacks curb, gutter, sidewalk, and storm drain improvements.

The Sites Inventory proposes to rezone one underutilized site in the Hatch/Stonum neighborhood from R-A to R-3 to allow for 22 units. Census Tract 2702, which encompasses the Hatch/Stonum neighborhood, is a low resource area, with a lower risk of displacement, and a pollution burden percentile of 72.9 percent. The median income in this census tract is \$55,607, with 84 percent of households identifying as non-white, 53.9 of renter households are cost-burdened, and 15.9 percent of households are overcrowded.

Ceres-River Road

The Ceres-River Road neighborhood is located south of the Tuolumne River and the City of Modesto, west of Mitchell Road, east of Herndon Road, and north of Nadine Avenue and the city of Ceres, within the City of Ceres SOI. This neighborhood is made up of large residential parcels typically one to two acres in size which were created by the deeding of land and by a series of parcel maps. Mancini Park and Tuolumne Elementary school are located just west of the neighborhood. The neighborhood lacks water, sewer, stormwater, curb, gutter, and sidewalk, and has partial streetlights. Northern portions of the parcels adjacent to the Tuolumne River in the neighborhood are in the floodway.

The Sites Inventory includes one vacant parcel, 2.4 acres in size, in this neighborhood which already has the appropriate zoning to accommodate five above moderate-income units. Census Tract 2701, which encompasses the eastern half of the Ceres-River Road neighborhood, is a low resource area, with a lower risk of displacement, and a pollution burden percentile of 44.2. The median income in this census tract is \$77,269, with 57 percent of residents identifying as non-white, 49.7 of renter households that are cost-burdened, and 0.3 percent of households that are overcrowded. The western half of the Ceres-River Road neighborhood is a low resource area in Census Tract 2702, described above in the in the Hatch/Stonum neighborhood description.

Ceres-Herndon

The Ceres-Herndon neighborhood is located east of the Bystrom neighborhood and Herndon Road; south of the Ceres-River Road neighborhood; north of Nadine Avenue; and west of Richland Avenue, within the City of Ceres SOI. The neighborhood was developed into 6,000 to 8,600 square foot lots by the Richland Tract in 1946, Richland Tract No. 2 in 1947, Herndon Estates Tract in 1971, Tempo Park Tract No. 1 in 1970, and Tempo Park No. 2 in 1979. E Hatch Road is located on the southern end of the neighborhood and is developed with a variety of commercial uses. The Tuolumne Elementary School is located to the northeastern of the neighborhood, within the Bystrom neighborhood. The neighborhood has water and partial sewer, but lacks stormwater, curb, gutter, and sidewalk. The Ceres-Herndon neighborhood was awarded ARPA funds which are proposed to fund curb, gutter, sidewalk, and storm drainage improvements.

The Sites Inventory includes two vacant sites in this neighborhood that have the appropriate zoning in place to accommodate two above moderate-income units. The Ceres-River Rd. neighborhood is a low resource area in Census Tract 2702, which is described above (in the Hatch/Stonum neighborhood description).

Wallin/Payne

Wallin/Payne is a County island in the North Ceres area, located north of E. Hatch Rd., south of River Road, between Richland Avenue and Moffett Road. Portions of the neighborhood has public water and the entire neighborhood lacks sewer, stormwater, curb, gutter, sidewalk, and streetlight improvements.

No parcels in this neighborhood are included in the Sites Inventory due to a lack of water and sewer service and a lack of vacant and underutilized parcels in the neighborhood. The Wallin/Payne neighborhood is in Census Tract 2702, which is described above (in the Hatch/Stonum neighborhood description).

South Ceres (Laurel/Central)

The Laurel/Central neighborhood is located east of Central Avenue, west of Highway 99, north of E. Service Road, and south of Industrial Way in an unincorporated pocket on the southside of the City of Ceres. Residential uses surround the neighborhood to the west, east, and south and industrial development surrounds the neighborhood to the north along Highway 99. The neighborhood was created in 1922 with the Estate Acres subdivision which created 13 lots five to 14 acres in size. The portions of the neighborhood located north of Don Pedro Road were further subdivided into 6,000 to 8,000 square-foot lots by the McQuary Tract and Dillon-Morrow Tract in 1944, the Riggs Tract in 1945, the Don Pedro Estates in 1979; the properties between E Service and Don Pedro Roads were further subdivided into ½ acre to 1.5 acre lots by various parcel maps. Don Pedro Elementary School and Don Pedro Park are located west of the neighborhood, within the City of Ceres limits, and Central Valley Highschool and Ceres Adult School are located to the southwest of the neighborhood in the unincorporated area, on the south side of Service Road, in an unincorporated County area. The neighborhood is served by the Laurel Landscape and Lighting District and portions of the neighborhood are lacking water, sewer, curb, gutter, sidewalk, and storm drainage improvements.

The Sites Inventory includes one rezone site in this neighborhood which can accommodate 76 lower-income and 7 moderate-income units (83 units total) on a 4.18 acre parcel located adjacent to a duplex development. The Sites Inventory also includes six vacant and underutilized sites, totaling 2.93 acres in size, which already have the appropriate zoning in place to accommodate ten moderate- and above moderate-income units. Census Tract 2503, which encompasses the Laurel/Central neighborhood, is a low resource area, with lower-income households at-risk of displacement, and a pollution burden percentile of 77.5. The median income in this census tract is identified as \$49,810, with 68 percent of residents identifying as non-white, 49.8 percent of renter households that are cost-burdened, and 10.0 percent of households that are overcrowded.

Turlock (Kenwood/Star)

The Turlock (Kenwood/Star) neighborhood is an unincorporated island located in the center of the City of Turlock, south of E Hawkeye Avenue, north of W Canal Drive, east of N Golden State Boulevard and Geer Road, and west of N Olive Avenue. The eastern half of the neighborhood was developed into 3,500 square foot lots by the Kenwood Park Tract in 1910 and the southwestern portion was developed into 7,600 square foot lots by the Turlock Tract in 1913. Marvin Dutcher Middle school is located northeast and Crane Park is located east of the neighborhood within the City of Turlock limits. The neighborhood is in close proximity to the StanRTA bus Route No. 10 which provides service between the downtown Modesto Transit Station through the City of Turlock. The area has public water, sewer and lacks curb, gutter, sidewalk, and storm drain improvements. The Kenwood/Star neighborhood has been awarded ARPA funding to develop curb, gutter, sidewalk, and storm drainage improvements in the neighborhood.

The Sites Inventory includes three vacant and underutilized sites, .80 acres total, which already have the appropriate zoning in place to accommodate ten moderate- and above moderate-income units. Census Tract 3906, which encompasses the Turlock (Kenwood/Star) neighborhood, is a low resource area, with lower-income households at-risk of displacement, and a pollution burden percentile of 47.1. The median income in this census tract is \$34,500, with 64 percent of residents identifying as non-white, 60.2 percent of renter households that are cost-burdened, and 4.6 percent of households that are overcrowded. Other unincorporated pockets surrounding the City of Turlock include the Berkeley, South Turlock – 5th Street, South Turlock – 8th Street/9th Street, Lander/Linwood, and the

Montana neighborhoods. The Berkeley and South Turlock – 5th Street neighborhoods have public water but no other infrastructure improvements. The other neighborhoods have no public water, sewer, or curb, gutter, sidewalk, or storm drain improvements. No parcels in these neighborhoods were included in the Sites Inventory due to a lack of infrastructure and a lack of vacant and underutilized parcels in the neighborhoods.

West Modesto

The Sites Inventory groups together the Elm/Emerald, Spencer/Marshall, Rouse/Colorado, California/Briggs, Robertson Road, Beverly/Waverly neighborhoods into the “West Modesto” area. The West Modesto area is an unincorporated area located along west of the City of Modesto, north of the Tuolumne River, south of Maze Boulevard, and east of Carpenter Road, within the City of Modesto SOI. The West Modesto area has frequent public bus service which provides access to downtown Modesto where many services are located. The Stanislaus Regional Transit Authority (StanRTA) provides bus service to the West Modesto area from the Downtown Modesto Transit Center along Maze Boulevard, Carpenter Road, and Paradise Avenue to the City of Ceres. Several commercial corridors are adjacent to the West Modesto area, including Maze Boulevard which runs east to west through the area and Paradise Avenue which runs diagonally through the center of the area.

Proposed rezoning in West Modesto is primarily focused on the Spencer/Marshall neighborhood, which is the County’s current priority for sewer infrastructure improvements. The design, engineering, and environmental assessment phase of the Spencer/Marshall sewer project (one of three neighborhoods included in the West Modesto Sewer Infrastructure Project) have been completed and two of five phases have been constructed utilizing CCDBG funding administered by the County as a federal entitlement entity. The County is actively working with the State Water Board to finalize the funding to complete installation of the Spencer Marshall sewer project. Additional details about each of the neighborhoods in the West Modesto area is provided below:

Beverly/Waverly

The Beverly/Waverly neighborhood is located mostly north of Paradise Road, east of Carpenter Road, and south of Chicago Road. The Paradise Colony subdivision map created 10-20-acre parcels in the area in 1903. The Paradise Park Tract subdivision further subdivided these lots into 2-acre lots in 1916. Between 1928 and 1945 the neighborhood continued to be subdivided into smaller lots ranging in size between 5,000 to 9,000 square-feet by the Paradise Homes subdivision, the Paradise Orchard Tract, the Paradise Homes First Addition, and the Paradise Terrace subdivision. The neighborhood includes the Burbank-Paradise Fire District station and Burbank-Paradise Park, where a local office for the Police Activities League is located, in the unincorporated area and the Burbank-Paradise Elementary School, which is located within Modesto’s city limits. This area has public water and is included in the West Modesto Infrastructure Project area for planned sewer improvements. However, this neighborhood lacks curb, gutter, sidewalk, and storm drainage improvements.

The Sites Inventory includes one non-vacant rezone site in this neighborhood that is 0.5 acres in size and can accommodate 6 lower-income units. In addition, this neighborhood includes three vacant sites west of Carpenter Road (one on Waverly Road and two on Paradise Road) that can accommodate three above moderate-income units. The eastern half of the Beverly/Waverly neighborhood is in Census Tract 1603, described below (in the Robertson Road neighborhood description), and the western half is in Census Tract 1500, described below (in the Elm/Emerald neighborhood description).

California/Briggs

The California/Briggs neighborhood is primarily located south of California Avenue, west of Spencer Avenue, east of Panama Drive, and north of Houser Lane. The neighborhood was first created with the recording of the Brichman's Addition to the City of Modesto, recorded on October 1904, which created five acre lots and was further sub-divided into smaller lots later with the Wheatly Tract, recorded in 1946, the Bird Tract No. 1, recorded in 1964, and the Briggs Avenue Subdivision, recorded in 1998. Central Catholic Highschool, Mark Twain Junior Highschool, and Mark Twain Park are located just northwest of the neighborhood within the City of Modesto city limits. The Dr. Martin Luther King Jr. Park, which contains the West Modesto King Kennedy Neighborhood Community Center, and Mellis Park are located on the northeast of the neighborhood, in the City of Modesto city limits. The neighborhood has public water and there is a public sewer line that runs down the center of the area through Seybold Avenue. However, the neighborhood does not have curb, gutter, sidewalk, or storm drainage improvements.

The Sites Inventory includes six vacant and underutilized sites, which currently have the appropriate zoning to accommodate the development of 38 moderate- and above moderate-income units. The California/Biggs neighborhood is in Census Tract 1601, which is described below (in the Spencer/Marhsall neighborhood description).

Elm/Emerald

The Elm/Emerald neighborhood is located east of Emerald Avenue, South of Highway 132, north of Maze Boulevard, and west of Highway 99. The Map of Maze Ranch subdivision, recorded March of 1909, subdivided lots ranging between 20 – 55 acres in size in a swath of land that includes the Elm/Emerald neighborhood. The area was further subdivided into 7,300 square-foot lots by the Map of Emerald Acres subdivision, recorded in June of 1950, and a series of parcel maps. The Franklin Elementary and Preschool are located south of the neighborhood across Maze Boulevard, within the City of Modesto's city limits. The neighborhood is currently served with public water by the City of Modesto and has intermittent curb, gutter, and storm drain improvements. The neighborhood is lacking sidewalks, streetlights, and public sewer.

The Sites Inventory includes one vacant site in this neighborhood, which is 0.25 acres in size, that can accommodate one unit. Census Tract 1500, which encompasses the Elm/Emerald neighborhood is a low resource area, with a lower risk of displacement, and pollution burden percentile of 92.9. The population of within this census tract consists of 68 percent non-white residents with a median income of \$71,290. Approximately 52.5 percent of renter households in the West Modesto area are cost burdened and 12.2 percent of households are overcrowded.

Robertson Road

The Robertson Road neighborhood is located east of Carpenter Road, south of Robertson Road, north of the Tuolumne River, and west of Hays Street. The neighborhood was established with the River View Tract, which created 7,000 square foot lots in 1945. Robertson Road Elementary and Child Development Center, Golden Valley Health Center, Harriette Kirschen Elementary, and Robertson Road Park are located just north of the neighborhood within the city limits of the City of Modesto. Bellenita Park and the Tuolumne River Regional Park are located to the south of the neighborhood, within the City of Modesto city limits. The City of Modesto's wastewater treatment plant is located east of the neighborhood. The neighborhood has both public water and sewer; but does not have curb, gutter, sidewalk, or storm drainage improvements. The County is in the process of applying for ATP funds, to be leveraged with Measure L funds, to install sidewalks in the neighborhood.

The Sites Inventory includes 12 vacant sites in this neighborhood, which currently have the appropriate zoning to accommodate the development of one moderate-income and 12 above moderate-income units. Census Tract 1603, which encompasses the Robertson Road neighborhood, is a low resource area. The population within this census tract consists of 84 percent of non-white residents with a median income of \$55,461. Approximately 66.7 percent of renter households in the census tract are cost burdened and 18.8 percent of households are overcrowded. The pollution burden for the area is in the 67.7 percentile.

Rouse/Colorado

The Rouse/Colorado neighborhood is located west of Highway 99, east of Carpenter Road, north of Robertson Road and the Tuolumne River, and south of Paradise Avenue. The Rouse Colony subdivision map (which created two, five, and 10 to 30 acre lots) and the Sunset Acres subdivision map (which created one to two acre lots) were both recorded in January of 1911. The neighborhood was further subdivided by the Graham Acres subdivision, recorded in July of 1912, the Southside Tract, recorded in January of 1916, the Modesto Highschool Tract, recorded in March of 1925, the California Homes Tract, recorded in August of 1941, and the Casino Tract, recorded in January of 1947 and is now made up of lots ranging in size between 6,000 square feet and 1.25 acres. The Modesto Municipal Golf Course and John Thurman Field are located just northeast of the neighborhood and the Dryden Park Golf Course is located south of the neighborhood. Marshall Elementary School and James Marshall Park are located on the northwestern edge of the neighborhood. Modesto Highschool is located north of the neighborhood on Paradise Road, within the City of Modesto city limits. The neighborhood is currently served with public water by the City of Modesto, but is lacking sewer, curb, gutter, sidewalk, and storm drain improvements. The Rouse/Colorado neighborhood is one of three neighborhoods included in the West Modesto Sewer Infrastructure Project. As part of the project, a fly line has been completed utilizing CDBG funding. The County is pursuing a State Water Board Grant to fund construction of the remaining project (sewer mainlines, laterals, and on-site connections). ARPA funds have been awarded and are proposed to fund curb, gutter, sidewalk, and storm drainage improvements. This neighborhood is part of the Paradise South Landscape and Lighting District, which maintains streetlights in the neighborhood. The City of Modesto has dedicated funding to make infrastructure improvements in this neighborhood and has expressed an interest in annexing the area; however, no formal application has been submitted to date.

The Sites Inventory includes nine vacant sites and 13 non-vacant sites in this neighborhood, which currently have the appropriate zoning to accommodate the development of 140 units. Census Tract 2200, which encompasses the Rouse/Colorado neighborhood, is a low resource area. The population of within this census tract consists of 84 percent of non-white residents with a median income of \$44,010. Approximately 61.9 percent of renter households in the census tract are cost burdened and 22.7 percent of households are overcrowded. The pollution burden for the census tract is in the 84.9 percentile.

Spencer/Marshall

The Spencer/Marshall neighborhood is located south of Maze Boulevard, east of the MID Lateral No. 5, north of California Avenue, and west of S Martin Luther King Drive. The neighborhood was originally created by the Spencer Colony subdivision map, which created multiple parcels approximately 10 acres in size. These 10-acre lots were further subdivided into lots half an acre to two acres in size. The Dr. Martin Luther King Jr. Park, which contains the West Modesto King Kennedy Neighborhood

Community Center, and Mellis Park are located on the southeast corner of the neighborhood, in the City of Modesto city limits. The Helen White Trail runs north to south from Maze Boulevard to California Avenue to the east of the neighborhood. Franklin Elementary and Preschool are located west of the neighborhood, within the City of Modesto city limits. Central Catholic Highschool, Mark Twain Junior Highschool, and Mark Twain Park are located just west of the neighborhood within the City of Modesto city limits. The neighborhood has public water and is in the process of getting public sewer. Most of the neighborhood has streetlighting. The neighborhood does not currently have curb, gutter, sidewalk, or storm drain improvements.

The Sites Inventory includes 17 rezone sites in this neighborhood that are non-vacant which will be rezoned from low density residential zones (mix of R-A and R-1) to high-density residential (R-3) to allow for 242 lower-income units, 107 moderate-income units, and 15 above moderate-income units. The lots proposed for rezoning, range in size from 0.8 to 3.5 acres. Census Tract 1601, which encompasses the Spencer/Marshall neighborhood, as well as the east half of Beverly/Waverly neighborhood and the California/Briggs neighborhood is designated as a Census Tract of high segregation and poverty. The population within this census tract consists of 87 percent of non-white residents, with a median income of \$48,563. Approximately 63.7 percent of renter households in this Census Tract are cost burdened and 19.7 percent of households are overcrowded. The pollution burden percentile for the census tract is 61.5.

Other West Modesto pockets include the Martin Luther King Drive/California Avenue/Briggs Avenue, Houser Lane, and Vernon Avenue neighborhoods which do not have public water, sewer, curb, gutter, sidewalk, or storm drain improvements.

The Sites Inventory did not include any sites in these West Modesto neighborhoods due to the lack of public water, sewer, curb, gutter, sidewalk, or storm drain improvements.

Other County Neighborhoods (Pockets/Islands)

Other Modesto pockets not included in the Sites Inventory include: Sylvan Avenue/Coffee Road, and Gallo neighborhoods. No county pockets around the City of Riverbank were included in the Sites Inventory which include Northwest Riverbank (Area 38), Cipponeri Road, and Topeka Street/Santa Fe Street (which is receiving ARPA funding). These unincorporated neighborhoods were not included in the Sites Inventory due to a lack of water and sewer and to a lack of vacant and underutilized parcels in the areas.

Below is a description of the unincorporated County communities located outside of a sphere of influence of a city included in the Sites Inventory, including how they were established, community resources, infrastructure improvements and needs, sites inventory information, and an AFFH data summary:

Crows Landing

The Community of Crows Landing is approximately 3.2 square miles in size, located on the west side of Stanislaus County, straddling State Highway 33, between the cities of Newman and Patterson. Crows Landing was established in the 1850's as a ferry landing on the San Joaquin River for gold miners. After the initial gold rush was over, Crows Landing became a river port for steamers hauling agricultural goods produced in the area to market. The entire town moved to its present location adjacent to the railroad tracks, three miles west of its original site, in 1888 due to the arrival of the railroads. The Town of Crows Landing created residential lots, approximately 3,750 square feet in size and industrial lots along the railroad, in 1889. The area was further developed by the Fink's Addition

to Crows Landing in 1947, which created additional 7,000 square foot residential lots. Crows Landing is surrounded by agricultural uses and includes Limited-Industrial zoning along the Southern Pacific Railroad tracks which is developed with agricultural warehouses and packing sheds, adjacent to Highway 33. Approximately one and a half miles to the northwest of the town is the former United States Naval Auxiliary Landing Field, which previously served as a practice landing field for Navy, Marine, and NASA Research aircrafts and is now the site of the Crows Landing Industrial Business Park (CLIBP). Bonita Elementary School is located on the western edge of the community. StanRTA provides bus service from the City of Turlock along Highway 33 to Patterson through the community of Crows Landing and to the City of Newman via bus route no. 45. The Crows Landing community lacks curb, gutter, sidewalk, stormwater, street lights and sewer services. The Crows Landing Community Service District provides municipal water services for residential and commercial purposes via two groundwater wells. The District's ability to expand is extremely limited due to the limitations of their existing water system which has experienced periodic well failures. In the County's efforts to develop the CLIBP, a new well will be installed, in proximity to the districts existing two wells, providing an inter-connection between the new well and one of the District's existing wells in an effort to provide mutually beneficial well backup service. This partnership will provide for stabilization of the water system, but not for growth in the District's water capacity.

The Sites Inventory includes five vacant residential sites in this community, on existing vacant residential lots totaling 1.34 acres, that can accommodate five above moderate-income units. No rezone sites or further residential development is proposed in the Community of Crows Landing due to their water service limitations and lack of public sewer services. Census Tract 3400, which encompasses the Crows Landing Community, is a low resource area, with a low risk of displacement, and a pollution burden percentile of 90.4. The median income in this census tract is \$50,125, with 74 percent of the population identifying as non-white, 24.7 of renter households that are cost-burdened, and 7.7 percent of households that are overcrowded.

Del Rio

The Community of Del Rio is located north of Ladd Road, east of Carver Road, west of McHenry Avenue, and north of the Stanislaus River. William P. Bell, a golf course designer whose early works included Bel-Air Country Club and Riviera Country Club, designed the original 18-hole golf course in Del Rio in 1946. The first residential subdivision "Del Rio Estates" was developed in 1947. The first Del Rio Community Plan was adopted by the Stanislaus County Board of Supervisors in 1980. The Plan laid out low density residential development around the golf course, recreational areas, and agricultural areas surrounding the community. Several other residential subdivisions were subsequently developed around the golf course throughout the 1980s. In 1992 the Del Rio Community Plan was amended to reflect planned residential development. The amended community plan identified existing and planned residential development in Del Rio Community Plan Area I and future growth south of existing development in Del Rio Community Plan Area II. The Del Rio Community Plan was updated again in 1998 to reflect a golf course expansion. However, the Community Plan maintained the residential areas as existing development in Area I and future development, pending a specific plan and EIR, in Area II. The existing residential development is served by public water from the City of Modesto and includes a combination of private septic systems and packaged treatment systems serving individual developments. Older areas of Del Rio were developed with curb and gutter improvements and newer subdivisions have curb, gutter, sidewalk, streetlights, and storm drainage

improvements. The Del Rio Community Plan Area I is almost entirely built out with the exception of a few areas.

The Sites Inventory includes 57 vacant parcels in Del Rio, all within Area I, totaling 114.35 acres that can accommodate 131 above moderate-income single-family units. The sites are consistent with the densities allowed by Area I of the Community Plan and consist of an approved 24-lot subdivision, “Del Rio Lago,” that has not yet been built and an 82-acre parcel identified as “Area I, Subarea 3” allowing for development at a density of one dwelling unit per acre. Census Tract 501, which encompasses the Del Rio Community, is a high resource area, with a lower risk of displacement, and a pollution burden percentile of 95.1. The median income in this census tract is \$95,036, with 74 percent of residents identifying as non-white, 26.5 of renter households that are cost-burdened, and 1.6 percent of households that are overcrowded.

Denair

The Community of Denair is located east of Waring Road, south of Taylor Road, north of Tuolumne Road, and west of the Turlock Irrigation District’s Main Canal; Santa Fe Avenue bisects the Community of Denair. The development of Denair, like that of most of the San Joaquin Valley, centered around the availability of irrigation water and the railroad. The Elmwood Colony created 20 to 40 acre lots in the west Denair area, stretching to the western edges of the City of Turlock. John Denair, a division superintendent for the railroad, bought the town site which was later named after him. The Elmdale Post Office was established on June 17, 1898 and in April 1902, John Davis deeded the land to establish the Elmwood School District. The town was renamed Elmwood on July 14, 1904. The Denair Community was further subdivided into one-acre lots in 1909 with the J.D. Subdivision. In 1912, the Denair High School was established. The Denair Community Services District, which provides public water and sewer and street lighting services to Denair, was established on October 3, 1961. The Denair Fire Protection Services District was established on October 3, 1961. The first Denair Community Plan was adopted by the Stanislaus County Board of Supervisors in 1987 and the Denair Municipal Advisory Council (MAC) was established in 1992. The older portions of the community lack curb, gutter, sidewalk, and storm drainage improvements; however, these improvement have been installed throughout the community as new subdivisions are developed. The County is in the process of applying for Active Transportation Planning funds, to be leveraged with Measure L funds, to install sidewalks in the neighborhood. The Burlington Northern Santa Fe Railroad runs through the center of the Community, which includes an Amtrak station. The Community includes an elementary school, middle school, and high school as well as several community parks.

The Sites Inventory includes four rezone sites in this community, on residential lots totaling 12.41 acres, that can accommodate a total of 127 lower-income and 38 moderate- and above moderate-income units. In addition, 20 vacant and underutilized sites have appropriate zoning to accommodate a total of 94 moderate- and above moderate-income units. Census Tract 3604, which encompasses the Denair Community, is a high resource area, with a low risk of displacement, and a pollution burden percentile of 69.8. The median income in this census tract is \$106,726, with 44 percent of residents identifying as non-white, 51.5 percent of renter households that are rent cost-burdened, and 3.5 percent of households that are overcrowded.

Diablo Grande

The community of Diablo Grande is located approximately 10 miles southwest of the City of Patterson and seven miles west of Interstate 5. The community of Diablo Grande exists in the Oak Flat Valley, a non-native grassland and oak savannah, surrounded by named and unnamed peaks of the Diablo

Mountain range and bisected by four creeks. The Diablo Grande community was originally approved by the Board of Supervisors as a specific plan in the 1990s, covering 2,300 acres, including construction of approximately 2,000 residential units and two golf courses. The Diablo Grande specific plan has been amended several times including amendments in 1999, 2004, 2005, and 2017. The most recent amendment in 2017 approved an increase in residential density including allowing for a broader range of residential unit types and lot sizes as a means of increasing the number of permitted dwelling units from 2,017 to 2,354. The community is served by the Western Hills Water District for water and sewer services. Curb, gutter, sidewalk, street lighting, and storm drainage improvements have been constructed as the community plan builds out. The community is located in a High Fire Hazard Severity Zone and is served by the West Stanislaus Fire Protection Service for fire protection services.

The Sites Inventory includes 112 vacant sites in this community, a total of 155.31 acres, with appropriate zoning that can accommodate 112 above moderate-income units. Census Tract 06099003300, which encompasses the Diablo Grande Community, is identified by the TCAC maps as a Moderate Resource Area, with a low risk of displacement, with a pollution burden percentile of 96.5 percent. Of the total of 361 households in the census tract, the median income is identified as \$81,895 with 73 percent being non-white households, 35.9 percent are rent cost-burdened, and 10.7 percent of households are overcrowded.

East Oakdale

East Oakdale is located east of the City of Oakdale along the Stanislaus River. The community began as a 48,887-acre rancheria, named Rancheria Del Rio Estanislao, that covered the communities of Oakdale and Riverbank. Rancheria Del Rio Estanislao was formally recognized as a land grant and was subdivided into smaller and smaller properties. In the late 1890's larger parcel subdivisions, approximately 10 to 20 acres in size, were recorded in the East Oakdale area and Northern Orange Blossom Colony. The Oakdale Irrigation District is a provider of irrigation water to the agricultural area surrounding the East Oakdale neighborhood and provides domestic water service to the East Oakdale neighborhood. The community does not have a public sewer service and has been developed with private onsite septic systems. Older areas of East Oakdale, created by the Avery Tract in 1912, lack infrastructure improvements and the rest of the East Oakdale community includes a mixture of subdivisions developed with curb, gutter, and streetlight improvements and newer subdivisions, developed in the 1990s and later, having curb, gutter, sidewalk, streetlights, and storm drainage improvements.

The Sites Inventory includes 51 vacant and underutilized parcels in this community, a total of 148.23 acres, with appropriate zoning that can accommodate 161 above moderate-income units. Census Tracts 101 and 102 encompass the East Oakdale Community. These census tracts are high resource areas, with a lower risk of displacement, and pollution burden percentiles of 72.3 and 90.8. Median income is \$87,692 and \$104,010, with 17 and 26 percent of residents identifying as non-white, 26.0 and 27.9 percent of renter households that are cost-burdened, and 1.6 and 2.3 percent of households that are overcrowded.

Grayson

The Community of Grayson is located in the western part of the county, west of the San Joaquin River, east of Highway 33, and north of Grayson Road. The town of Grayson was established in 1849 and was a river port along the San Joaquin River during the gold rush. The town had a boom period in the late 1860's when grain was the biggest cash crop in the area. By the 1880's, Grayson was one of the

most active river ports in the county for grain, wool and produce. The community includes the Grayson United Community Park, which includes a Police Activities League office. StanRTA provides bus service between downtown Modesto and the City of Patterson via Bus Route No. 40. The Grayson Community Services District provides public water and sewer to the neighborhood. However, both systems require upgrades prior to any additional development. The community also has intermittent curb, gutter, and sidewalk improvements.

The Sites Inventory includes four vacant sites with appropriate zoning in this community that accommodate a total of six above moderate-income units, on a combined total of 1.41 acres. Census Tract 3300, which encompasses Grayson, is a moderate resource area, with a lower risk of displacement, and a pollution burden percentile of 96.5. The population is 87 percent non-white and has a median income of \$81,895. Approximately 35.9 percent of renter households are cost burdened and 10.7 of households are overcrowded.

Hickman

The Community of Hickman is located south of the Tuolumne River, a mile and a half south of the City of Waterford. Hickman was an agricultural community, which became a shipping point for grain and hay after the construction of the Southern Pacific Railroad in the late 1800s. The Town of Hickman, created in 1913, developed 3,125 square foot lots centered around the Southern Pacific Railroad, which was later abandoned and the tracks were demolished in the mid to late 20th century. The community of Hickman includes the Hickman Charter School, originally the Rowe School built in 1868, which serves as a homeschool hub for families throughout the Central Valley and Bay Area region. StanRTA provides bus service between the Cities of Ceres to the City of Waterford to the community of Hickman via Bus Route No. 50. The community is served with public water by the City of Waterford and lacks curb, gutter, sidewalk, stormwater, and sewer services. The Hickman Municipal Advisory Council was established on May 17, 1994.

The Sites Inventory includes four vacant and underutilized sites with appropriate zoning in this community, which can accommodate a total of 19 above moderate-income units, on a combined total of 6.65 acres. Census Tract 2901, which encompasses Hickman, is a high resource area, with a lower risk of displacement, and a pollution burden percentile of 75.1. The population is 43 percent non-white and has a median income of \$79,474. Approximately 17.7 percent of renter households are cost burdened and 3.1 percent of households are overcrowded.

Keyes

The community of Keyes, is located south of the City of Ceres and north of the City of Turlock, along the Highway 99 Corridor. Highway commercial and truck related uses exist along the community's western edge along highway 99 and along the southwestern edge of the community near the Keyes Road exit off of highway 99. The community first developed around the Central Pacific Railroad with the Map of the Town of Keyes in 1908, which created 3,750 square foot residential lots. The community then expanded post WWII with suburban development with the Warda Tract which created 0.5 acre lots in 1946 and then the Town of Keyes Map and the Texera Tract Map which created 6,000 to 7,000 square foot residential lots in 1947 east of State Highway 99. The Keyes Community Services District, which provides public water, sewer, and street lighting services to the community of Keyes, was established in 1955. The neighborhood also has curb, gutter, storm drainage, and intermittent sidewalk improvements. The Keyes neighborhood is also served by the Keyes Fire Protection Services District which was established in 1960. The first Keyes Community Plan was adopted by the Stanislaus County Board of Supervisors in 1987 and the Keyes Municipal Advisory

Council was established in 1991. The neighborhood has curb, gutter, storm drainage and partial sidewalk improvements. StanRTA provides bus service to the community of Keyes on Route 29T, which runs between downtown Modesto, through Keyes, to the City of Turlock. The Keyes Community School District includes a charter school elementary school, and middle school; the community also has multiple community parks.

The Sites Inventory includes three rezone sites can accommodate a total of 58 lower-income units and 20 moderate- and above moderate-income units, on a combined total of 4.45 acres, and 11 vacant and underutilized sites with appropriate zoning in this community, which can accommodate a total of 36 moderate- and above moderate-income units, on a combined total of 5.05 acres. Census Tract 3002, which encompasses Keyes, is a high resource area, with a lower risk of displacement, and a pollution burden percentile of 78.7. The population is 75 percent non-white and has a median income of \$56,579. Approximately 40.0 percent of renter households are cost burdened and 7.7 percent of households are overcrowded.

Salida

The Community of Salida is located north of Modesto along Highway 99, south of the Stanislaus River. The original settlement was called Murphy's Ferry and operated as a ferry crossing along the Stanislaus River during the gold rush. In 1875, the community was granted a post office, but a new name had to be chosen because there already was a Murphy's post office in Calaveras County. A Spanish word, "Salida", was chosen and this implied that the new town was "near the water", being the closest town to the south bank of the Stanislaus River. The Map of the Town of Salida developed 4,800 square foot residential lots in 1908 and the Kewin Plat created additional residential lots in 1909 centered around the railroad in Salida, which now lies on the west side of Highway 99. Additional low density residential subdivisions developed on the westside of Salida in the late 1930s and 40s and on both the east and west sides of Highway 99 in the 1980s through the early 2000s. The Salida Fire Protection District was established in 1955 and the Salida Sanitary District in 1957. The first Salida Community Plan was adopted by the Stanislaus County Board of Supervisors in 1987 and the Salida Municipal Advisory Council was established in 1984. The Salida Unified School District includes four elementary schools and one middle school. Salida also includes two private TK-8 schools and Gregori Highschool , which is in the Modesto City School District. The Salida community also includes a number of community parks and a County maintained Library. StanRTA provides bus services via Route 48 between downtown Modesto and the community of Salida. The Stanislaus County Board of Supervisors passed an ordinance on August 7, 2007, to implement the Salida Area Planning "Roadway Improvement, Economic Development and Salida Area Farmland Protection and Planning Initiative," also known as the "Salida Initiative," which amended the Salida Community Plan (SCP). The amended SCP provides land use planning and guidance for development of approximately 4,600 acres of land in the Salida area. SCP encompasses the existing community of Salida, which was part of the previously approved SCP (Existing Plan Area), and an amendment area encompassing approximately 3,383 acres (Amendment Area). The SCP was adopted by the Board of Supervisors without environmental review, which was allowed at the time for initiatives. Environmental review is required for build out of the SCP.

The Sites Inventory includes three rezone sites, located in the existing Salida Community Plan area, 1.4 acres total, which propose to rezone property from General Commercial (C-2) to Neighborhood Commercial (C-1) to accommodate a total of 21 moderate- and above moderate-income units as well as two sites, .60 acres total, with appropriate zoning in this community, which can accommodate a total of seven moderate- and above moderate-income units. Census Tracts 501 and 510 encompass

the Salida Community. These census tracts are moderate and high resource areas, with a lower risk of displacement, and pollution burden percentiles of 77.8. Median incomes are \$62,253 and \$95,036, with 33 and 73 percent of residents identifying as non-white, 26.5 and 54.3 percent of renter households that are cost-burdened, and 1.6 and 4.4 percent of households that are overcrowded.

Valley Home

The community of Valley Home is located in the eastern portion of the County, north of Highway 120 and the City of Oakdale, east of the San Joaquin County line, and west of Valley Home Road and Woodward Reservoir. Valley Home was once the shipping point for north-eastern part of the county. Originally called Clyde, then Thalheim, and now Valley Home (English translation of Thalheim), the community of Valley Home was created in 1904 by the Map of Thalheim, which created a 14-acre township made up of 2,800 square foot lots. The area had previously been a large wheat ranch that was taken over by a banking company through foreclosure of a mortgage. In order to recuperate its losses, the company took advantage of the irrigation plan, in which water was provided by the Tulloch Ditch Company. The land was sold to a real estate company, divided into small ranches, and sold by newspaper advertising to German families in the Middle West. The community has an elementary school and a middle school. Residential development in the community of Valley Home utilizes private wells and septic systems and does not have curb, gutter, sidewalk, or storm drainage improvements.

The Sites Inventory includes four vacant sites totaling 0.61 acres with appropriate zoning to accommodate four above moderate-income units. Census Tract 101, which includes Valley Home, Knights Ferry (not in the Sites Inventory), and the northeastern portions of East Oakdale, is described above (in the East Oakdale Community description)

Other County Communities

County communities not included in the sites inventory include: the communities of Knights Ferry and La Grange, both historic mining communities located on the east side of the County along the Stanislaus and Tuolumne Rivers; the community of Westley which is located west of the Community of Grayson and Highway 33 and east of Interstate 5, on the westside of the County; and the Monterey Park and Cowan Tracts, which are rural residential subdivisions, located south of the City of Ceres, surrounded by agricultural uses. None of these communities are near services or transit routes and lack the infrastructure needed for residential development.

Sites Inventory Discussion

The unincorporated areas of East Oakdale, Knights Ferry, Valley Home, and Hickman are all viable communities, however, development in these areas is challenged by either the lack of available land or lack of infrastructure making the feasibility for any development beyond the capacity afforded under the existing zoning infeasible. The remote nature of these communities affords residents limited job opportunities, limited transit opportunities, and basic service support hubs, and in some cases basic services (such as grocery stores, pharmacies, and auto repair facilities), making them less suitable for high-density housing development. Furthermore, development in these areas would require the conversion of agricultural land, which is the backbone of the county's economy.

Rezone sites have been identified in the moderate-resource areas of Denair and Keyes where existing non-agriculturally zoned lands with available access to public water and sewer exist. The Sites Inventory proposes the greatest number of lower-income units in Bret Harte (481 lower-income units), West Modesto (248 lower-income units), and Denair (127 lower-income units). Denair, with a

community plan footprint of 1,013 acres, has been assigned 12 percent of the lower-income units, the third highest assignment. Additional growth in both the communities of Denair and Keyes, within adopted community plan areas, are constrained by the 2008 passage of Measure E (discussed in Section 3.15, Other Relevant Factors) which requires a vote of the public in order to allow for residential development. While the residential areas within these community plan areas were adopted prior to the passage of Measure E, the County's General Plan and zoning districts had not been amended, with the expectation that those amendments would come with the future review once development plans for these areas are produced. Development within Salida and Del Rio is restricted by the lack of environmental review being conducted for the Amendment Areas of the Community, which includes a lack of identified infrastructure to serve these areas. However, the County recently entered into an agreement with an environmental consulting firm to complete a Programmatic EIR for the amendment area of the Salida Community Plan, inclusive of development of infrastructure planning and a fee program (Housing Action 2-1.g).

No displacement of existing residents is foreseen as part of the proposed rezoning and, while these areas may be considered to be low-resource areas today, the County is actively working to improve access to opportunities in these areas. The introduction of well-planned and well-designed residential opportunities will aid in addressing the communities' need for a broader range of affordable housing opportunities.

3.16.5 Racially/Ethnically Concentrated Areas of Poverty and Affluence

As noted in Section 3.9.1, there are five census tracts listed as R/ECAP areas in Stanislaus County, and these areas overlap with three CDPs: Airport, West Modesto (Rouse/Colorado), and Bret Harte/South Modesto. These CDPs are also located in areas with predominantly Hispanic/Latino residents and elevated rates of poverty. Feasible sites were found in both Airport and Bret Harte/South Modesto. The number of units within each of these CDPs by income group is:

- Airport: 18 moderate-income and 8 above-moderate income units
- Bret Harte/South Modesto: 481 lower-income, 101 moderate-income, and 31 above moderate-income housing units

Within Bret Harte/South Modesto, the largest opportunity for the development of affordable housing units is in the vicinity of Fairview Park where five parcels encompassing a total of approximately 24 acres have a combined capacity of 486 dwelling units. Of these units, 445 are allocated to the lower income RHNA. These five sites are well located with sewer and water infrastructure available through existing connections to the City of Modesto and access to two elementary schools (Bret Harte and Fairview Elementary) within less than a mile. Stanislaus Transportation Authority's Route 42 bus links the Fairview Park neighborhood to services and job centers in Modesto and Ceres, the sites are directly adjacent to neighborhood commercial with more the more extensive Crows Landing Road commercial corridor approximately one mile away. These sites are also directly adjacent to the recently refurbished Fairview Park, providing high-quality recreational facilities close to residents.

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

- East Oakdale: 161 above-moderate income housing units
- Valley Home: 4 Above-moderate income housing units
- Denair: 127 lower-income, 39 moderate-income, and 93 above-moderate income housing units

While there are sites suitable for the development of lower-income housing units in Denair, no sites suitable for affordable housing were identified in Valley Home, East Oakdale, or Del Rio. As discussed in Chapter 5, Housing Resources, these areas are infrastructure constrained as there is no municipal sewer service available. All housing units built in these areas would utilize individual septic or onsite package treatment systems to handle wastewater. Program 3-9 of the Housing Plan will facilitate the prioritization and expansion of services and infrastructure for affordable housing projects throughout the County. Furthermore, Program 3-8 seeks to accelerate the construction of Accessory Dwelling Units throughout the County as a strategy to improve housing mobility and increase the availability of housing in high opportunity communities.

Overall, there is a total of 977 lower-income, 491 moderate-income, and 256 above-moderate income housing units identified in the Sites Inventory that are located in areas where the population is predominantly Hispanic/Latino.

3.16.6 Access to Opportunity

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

3.16.7 Disproportionate Housing Needs

The highest percentage of both cost-burdened households are located in the South Modesto CDPs, as seen in Figure 3-46. Similarly, as shown in Figure 3-50, an elevated percentage of overcrowded households exists within the South Modesto CDPs. The combination of the two CDPs in Bret Harte (South Modesto) and West Modesto results in an estimated capacity of 729 lower-income, 317 moderate-income units, and 138 above moderate-income housing units to be built. Providing more affordable housing opportunities in these areas may lower levels of cost burden in these CDPs.

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

3.16.8 Subsidized Housing

As discussed in Section 3.10 Location of Affordable Housing, Stanislaus County has a range of publicly assisted rental housing affordable to lower and moderate-income households within its incorporated cities, and none in unincorporated communities. Overall, there is a concentration of HCV recipients or subsidized housing projects in the South Modesto CDPs, as seen in Figure 3-60. Sites identified as adequate for lower-income housing are located in the South Modesto CDPs where HCV recipients

represent between 1.9 and 17.1 percent of renter-occupied housing units. The development of lower-income housing units on the sites identified in the Sites Inventory do not create an unusually high concentration of lower-income units near existing affordable housing projects or in neighborhoods with high concentrations of housing choice voucher recipients.

3.17 Identification and Prioritization of Contributing Factors

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

High Priority

- **Need for Additional Public and Private Investments in Specific Neighborhoods.** The range of resource scores for unincorporated communities is wide ranging, according to the TCAC opportunity maps. Especially where inventory sites to accommodate lower-income housing are located, the County will take actions under the following program to promote equitable investments (and public investments that can spur private investments) in unincorporated communities:
 - Program 1-1: Home Rehabilitation Program
 - Program 2-4: Support Homeownership Opportunities
 - Program 3-9: Infrastructure
- **Low Supply of Affordable Housing.** This analysis, alongside input from community feedback, identified there not being enough affordable housing units throughout the County to accommodate households in need. Lower-income households are not able to secure affordable housing even with the assistance of HCVs due to low supply. In addition, lower-income households are disproportionately affected by housing problems, including overpayment, compared to moderate- and above moderate-income households, indicating they are in need of more affordable housing options. The following programs will address low affordable housing supply:
 - Program 1-1: Home Rehabilitation Program
 - Program 2-1: Affordable Housing Development Assistance
 - Program 2-2: Density Bonus
 - Program 3-4: By-Right Approval for Projects with 20 Percent Affordable Units
 - Program 3-9: Infrastructure
- **Location and Type of Affordable Housing and Land Use and Zoning Laws.** The majority of the unincorporated County's existing housing stock is single-family residences, limiting residents' choice of housing type and cost. Expanding housing opportunities through zoning regulations and other programs like home-sharing could improve access in all neighborhoods. Programs addressing this issue include:

- Program 2-3: Housing Choice Vouchers
- Program 3-1: Ensure Adequate Sites to Accommodate Regional Fair Share of Housing Growth
- Program 3-6: Zoning for a Variety of Housing Types
- Program 3-8: Accessory Dwelling Units

Moderate Priority

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

Low Priority

- **NIMBYism and Public Perception of Housing Development.** Public opposition to housing development in some unincorporated communities can be strong. The County will establish public outreach campaigns to reduce opposition to housing development generally through the following programs:
 - Program 4-4: Community Outreach and Education
- **Access to Financial Services.** Residents of unincorporated Stanislaus County struggle to secure financing for home ownership, particularly nonwhite residents. The following programs will help to increase access to financial resources:
 - Program 2-4: Support Homeownership Opportunities

- **Displacement.** Residents in the Bret Harte (South Modesto), North Ceres, Empire, and Crows Landing areas are particularly susceptible to displacement, with Bret Harte (South Modesto) CDP facing the most displacement pressure. The following programs will address displacement risk:
 - Program 3-3: Replacement Housing
 - Program 5-3: Displacement Prevention

There are a few key overarching, meaningful outcomes with metrics that can be used to measure progress and effectiveness of the overall effort and combined impact of programs to improve fair housing results. Table 3-21 defines overarching outcomes and metrics for all the Fair Housing Strategies. Outcomes focus on ensuring lower-income households have housing mobility, including in high-resource areas; preventing displacement for vulnerable households; and improving neighborhood conditions in low-opportunity areas.

Table 3-21 AFFH Programs by Category

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
Fair Housing Outreach and Enforcement	Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.	Review policies and procedures for community development and housing assistance programs	By December 2026 and make necessary changes within six months.
	Action 5-1g: Offer training to County staff on a variety of topics included in the County's Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)	Beginning 2025, offer training sessions annually during the planning period.	Annually
Housing Mobility	Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities	Seek funding as applicable Notices of Funding Availability (NOFA) become available	Annually
Anti-Displacement	Action 5-1e: Modify funding policies, if necessary, to allow the use of eligible State and/or Federal funding to repair failing septic systems.	Modify funding policies	By June 2025
New Housing Choices in High Opportunity Areas	Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of "Outstanding" and may exclude those with a rating of "Needs to Improve" or "Substantial Noncompliance" according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC).	Review an individual institution's most recent Home Mortgage Disclosure Act (HMDA) reporting as most recently published by the Federal Financial Institutions Examination Council (FFIEC).	Ongoing - Annually

Fair Housing Strategy	Key Supporting Programs	Key Measures	Time Frame
	Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6th Cycle Housing Element planning period.	Apply for Prohousing designation	By June 2025.
Place-Based Strategies for Community Improvement	Action 5-1c: Assess the feasibility of allowing a variety of home-based economic opportunities in residential neighborhoods, e.g., micro-kitchens, day cares, and home occupations.	For those opportunities determined feasible, establish a plan to Amend County Code	By June 2025.

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