

Table of Contents

6 Housing Plan 6-1

 6.1 Summary of Quantified Objectives 6-29

Tables

Table 6-1 Quantified Housing Objectives (2023-2031)..... 6-29

6 Housing Plan

The Housing Plan identifies the County's housing goals, policies, and programs. The overall strategy is to present a balanced and diverse array of programs which address the main issue areas of construction, preservation of affordable housing, conservation of naturally occurring affordable housing, rehabilitation, and administration. Stanislaus County's Housing Plan includes the six following themes:

- **Conserving and Improving Existing Housing Stock.** Conserving and improving the existing housing stock helps maintain investment in the community and keeps existing housing affordable. Because a majority of the housing stock in the unincorporated areas of the County is more than 30 years old, rehabilitation efforts are important to preserve housing stock. Over 72 percent of the housing units in unincorporated Stanislaus County are older than 30 years versus 65 percent in incorporated Stanislaus County. While the age of housing, by itself, does not necessarily equate with poor housing conditions, there is greater potential for housing problems in older structures. Preventing problems from occurring and addressing them when they do occur protects the safety and welfare of residents and assists in meeting housing needs throughout Stanislaus County, particularly for the most vulnerable residents. Additionally, supporting the maintenance and preservation of the existing housing stock, including mobile home parks, stabilizes neighborhoods and protects against displacement, particularly for low-income residents. The County will focus its efforts on rehabilitation, code enforcement, preserving existing affordable units, and implementing anti-displacement policies and programs to take a proactive approach to conserving and improving the current housing stock.
- **Assisting in the Development of Affordable Housing.** Providing affordable housing is essential for a healthy community. Seeking funding from varied sources increases the opportunities for the development of affordable housing units. The County works with both non-profit and for-profit developers in the production of affordable for-sale and rental housing. Recognizing a variety of housing needs, the County supports the development of affordable housing opportunities ranging from creation of rental housing that meets the needs of extremely low-, very low-, and low-income households to creation of ownership housing for lower and moderate-income households to improve housing stability, help instill a pride of ownership, and increase wealth building opportunities.
- **Housing For Persons with Special Needs.** The County of Stanislaus is a diverse community with people of all backgrounds, lifestyles, family types, and income levels. Many residents also have special housing needs. State law requires the housing element to address the needs of specific special needs groups, including seniors, persons with disabilities, large families with children, female-headed households, and individuals experiencing homelessness. Meeting the needs of these residents requires a broad range of strategies for housing and other services.
- **Equal Housing Opportunities for All Persons.** The County recognizes the importance of extending equal housing opportunities for all persons, regardless of race, religion, sex, family status, marital status, ancestry, national origin, color, age, physical or mental disability, sexual orientation, source of income, or any other arbitrary factor.
- **Providing Adequate Sites.** Pursuant to State law, the County is obligated to address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. Removing constraints on housing development can help address housing needs in the County by expediting construction and lowering development costs.

The County's Housing Plan is applicable to activities in and serving the unincorporated areas of Stanislaus County and commitments to use, or to explore the use of, entitlement funds received by the County, in partnership with other jurisdictions, are for the County's portion of the awarded funding, unless otherwise noted.

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

Policies

- 1A Support Safe and Livable Housing.** The County shall support code enforcement efforts in responding to complaints and ensuring that existing housing meets adopted code requirements that set forth acceptable health and safety standards for residential units, as the County is required to enforce existing housing and building codes.
- 1B Support the Preservation of Existing Single-Family Housing Occupied by Lower-income Households.** The County shall preserve the existing single-family housing stock occupied by lower-income households by providing rehabilitation assistance for single-family, owner-occupied units, including manufactured homes and mobile homes.
- 1C Provide Residential Rehabilitation Opportunities.** The County will partner with public and private agencies to provide funding support for residential rehabilitation programs to improve housing quality and conditions, ensuring the safety, habitability, and enhanced living standards for lower-income households.
- 1D Preserve At-Risk Units and Naturally Occurring Affordable Housing.** The County will seek to avoid the loss of publicly assisted affordable housing units and/or housing units occupied by lower-income households and the resulting displacement of low-income residents by providing funds, as available, to nonprofit developers to be used for the acquisition of subsidized housing developments at risk of converting to market rate units.
- 1E Code Compliance.** The County shall continue to encourage the rehabilitation of substandard residential properties by homeowners and landlords by responding to citizen complaints regarding potential code violations and referring residents to appropriate resources, as the County is required to enforce existing housing and building codes.

Programs

Program 1-1 Home Rehabilitation Program

The County will continue to assist income-eligible households with housing rehabilitation needs. The program is designed to respond to housing needs such as leaking roofs, fire damage, accessibility retrofits, and other health and safety related housing needs. This program is further intended to promote independence through accessibility modifications to eligible applicants with disabilities. The County will continue to partner with local nonprofit organizations in efforts to assist in single-family rehabilitation in the unincorporated County using state, federal and Redevelopment Successor Housing Agency funds for deferred or below market-rate interest loans, or grants. Priority will be given to improvements that correct health and safety issues, and to provide accessibility modifications for people who have disabilities.

Actions	Objective and Timeframe
Action 1-1a: Provide housing rehabilitation assistance for owner-occupied households, including mobile homes, with a focus on vulnerable and lower-income households including seniors on a fixed income and persons with disabilities. (Environmental Justice)	Provide grants and/or loans for home repairs of at least three owner-occupied housing units per year for a total of 24 housing units during the planning period.
Action 1-1b: Provide property owners of substandard or deteriorating housing with rehabilitation program resources to assist with repairs and rehabilitation <u>particularly in Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) and Racially Concentrated Areas of Affluence (RCAAs)</u> . (Environmental Justice)	Make program materials (e.g., fact sheets, brochures) available on a case-by-case basis upon property owner inquiry or at the time of code enforcement action.
Action 1-1c: Continue using rehabilitation funds for the testing and mitigation of housing units for lead-based paint pursuant to the Lead-Based Paint Hazard Reduction Act of 1992.	Continue to offer lead-based paint removal as part of the rehabilitation program.
Action 1-1d: Partner with the Stanislaus County Health Services Agency to develop and disseminate educational materials and programs focused on lead risk in housing to children, especially in Disadvantaged Communities. (Environmental Justice)	Develop materials to be disseminated together with rehabilitation program materials and to service providers by <u>December/June</u> 2025.
Action 1-1e: Work with local nonprofit organizations and community groups to expand and spread awareness on home and accessibility rehabilitation programs.	Provide program materials (e.g., fact sheets, brochures) to nonprofit organizations and community groups by June 2025 and on an ongoing basis, and County staff attend at least one public event per year to publicize rehabilitation programs.
Action 1-1f: Modify the housing rehabilitation program policies, as allowed by funding program guidelines, to assist lower-income homeowners in acquiring the necessary upgrades required to protect against indoor air pollution and poor drinking water quality associated with pesticide pollution. (Environmental Justice)	Modify the housing rehabilitation program policies to use funds, as allowed by funding program guidelines, for air and water filtration by <u>December/June</u> 2025.
Action 1-1g: Explore use of available state and federal funds for rental housing rehabilitation.	Annually, County staff will evaluate the feasibility of establishing a program to allow for rental housing rehabilitation using available state and federal funds, and, if determined feasible, pursue funds for that purpose.
Implements the Following Policies	1B, 1C, 1D
Responsible Agency	County Planning & Community Development County Health Services Agency
Funding Sources	Federal and State Funding

Program 1-2 Residential Compliance Program

Continue to enforce federal, state, and local laws such as the International Property Maintenance Code, California Housing Code (under Division 13 of the CA Health and Safety Code), Title 24 California Building Standards Code, and Title 16 – Buildings and Construction of the County Code to ensure minimum health and safety standards in residential units.

Actions	Objective and Timeframe
Action 1-2a: Amend the County Code, if determined necessary, to comply with Section 17970.5 of the California Health and Safety Code requiring that upon a rental tenant complaint, a) a mandatory inspection be conducted and b) specific actions identified that can be taken to mitigate any hazards present. (Environmental Justice)	If determined necessary, amend the County Code by January-June 2025. The goal shall be to inspect and specify actions to be taken within 30 days of the complaint being received.
Implements the Following Policies	1A, 1E
Responsible Agency	County Planning & Community Development County Department of Environmental Resources
Funding Sources	Department Revenues

Program 1-3 Building and Design Standards for Energy Efficiency

The County will continue to promote the reduction of energy usage and costs through building and design practices that meet the minimum standards of Title 24 and encourage conservation of energy resources and utilization of alternative energy resources.

Actions	Objective and Timeframe
Action 1-3a: Emphasize the incorporation of active and passive energy conservation features such as energy-efficient appliances; heating/cooling systems; windows, doors, and skylights; building materials; building/window orientation; and use of landscape materials in new and rehabilitated County-assisted affordable housing.	Amend funding policies to require the use of energy-efficient features, subject to funding guidelines, into all assisted dwelling units by June 2025. For rehabilitated units, application shall be subject to features being replaced or upgraded.
Action 1-3b: Partner with other agencies and energy providers who disperse information and/or offer programs and incentives to increase public awareness and utilization of energy conservation practices.	Identify partners and establish partnership opportunities to disperse information by December 2025.
Implements the Following Policies	1A
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 1-4 Preservation of At-Risk Affordable Housing

This program is intended to support the preservation or acquisition of restricted affordable units and unrestricted affordable units that could potentially convert to market-rate units during the planning period. There are no deed-restricted at-risk units in the unincorporated County at this time. The County would undertake actions in this program that apply to at-risk units if the County does have any affordable at-risk units prior to the end of the planning period.

Actions	Objective and Timeframe
Action 1-4a: Monitor the status of any deed-restricted affordable units built in the unincorporated County. If any at-risk units are identified, the County will complete actions 1-4b to 1-4f.	Annually.
Action 1-4b: Reach out to property owners of at-risk units to inquire about their plans for the property and assess the risk of loss of affordable housing units.	Send correspondence to property owner three years prior to termination of regulatory controls. Objective is to ascertain risk of loss of affordable units and identify if the County has resources to preserve the units.

Actions	Objective and Timeframe
Action 1-4c: Inform property owners of their obligation to comply with noticing requirements stipulated under state law to ensure that qualified non-profit entities from the State's qualified entities list are informed of the opportunity to acquire the affordable property and that tenants are informed about their rights and potential resources. If the property was built before July 1, 1979, inform property owner that rent increase limits will apply post conversion to market rate.	Send notice to property owner three years prior to potential project conversion. Provide follow-up with contacts one year and six months prior to conversion if property owner fails to comply. Objective is to ensure qualified non-profit entities are notified of acquisition opportunities and to ensure tenants are aware of the impending changes.
Action 1-4d: Proactively engage and provide technical assistance to potential purchasers of at-risk units, including nonprofits, developers, and tenants of potentially converting affordable properties. Assist with funding as feasible and/or support funding application for acquisition and/or rehabilitation of units.	Establish a list of established and potential housing purchasers within three months of identification of at-risk units. Contact potential purchasers of at-risk units to discuss affordability preservation at least one year prior to the expiration of at-risk units.
Action 1-4e: Work with property owners of at-risk units to provide information to the tenants of these units regarding tenant's rights and conversion procedures pursuant to AB 1521 (2017, Bloom) or other legal remedies.	At least 18 months prior to the expiration of the regulatory agreement for at-risk units, ensure that tenants understand their rights to remain in the units and that they receive information and referrals regarding available relocation assistance and resources.
Action 1-4f: Support qualified affordable housing developers that acquire and convert naturally occurring affordable housing to restricted affordable housing in applications for state or federal funding application requirements. The County may choose not to support projects that pose a high risk of displacement of existing tenants.	On a case-by-case basis.
Implements the Following Policies	1B, 1C, 1D
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

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

Policies

- 2A Homeownership Housing:** The County shall encourage the development of ownership housing and assist tenants to become homeowners to increase owner-occupancy rate within the parameters of federal and state housing laws.
- 2B Provide Incentives for Affordable Housing:** The County shall promote the use of density bonuses and waive or reduce park, transportation, and other impact fees to facilitate the development of new housing for extremely low-, very low-, and low-income households.
- 2C Integration of Affordable Housing:** The County shall encourage a mix of affordability levels in residential projects and encourage the dispersal of such units to achieve greater integration of affordable housing throughout the community.
- 2D Create Access to Capital:** The County shall support efforts to create access to capital needed to increase housing development and improve housing affordability in Stanislaus County. The County shall identify new funding sources and strategies to support affordable housing.

- 2E Regional Housing Needs Allocation (RHNA):** The County will support future StanCOG Regional Housing Need Allocation efforts that equitably recognize the County’s contribution to housing developments within city limits through the reduction in County Impact Fees for affordable housing development and for partnerships to develop affordable housing using County funds within the incorporated cities.
- 2F RHNA Transfer:** The County shall seek to negotiate agreements with any city proposing to annex land utilized by the County to meet its RHNA obligations to transfer a share of the StanCOG RHNA from the unincorporated area to the annexing city.

Programs

Program 2-1 Affordable Housing Development Assistance

The County is committed to developing and monitoring affordable housing and will continue to prioritize housing for very low- and low-income households in the development of additional housing stock. The County will continue to support the development of housing appropriate for extremely low-income households and seek new funding opportunities and partnerships. The County will work to prioritize households at the extremely low-income level and seek new funding opportunities and partnerships to improve housing conditions amongst the vulnerable and lower-income communities.

Actions	Objective and Timeframe
Action 2-1a: Actively promote sites to qualified housing developers for affordable housing development opportunities through RFPs with emphasis on promoting housing choices that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, multi-generational households, low-income, and/or persons with disabilities.	Release at least four RFPs for available sites for affordable housing and provide information on housing incentives and programs to support the entitlement of at least 100 housing units affordable to extremely low-, very low-, and low-income households in the County during the planning period.
Action 2-1b: Monitor availability of state and federal funding and support developers with their applications for incentives and funding programs that provide financial assistance to develop affordable housing for special needs populations.	Annually, review proposed development budgets and schedules for County-funded affordable housing projects to identify the need for County support with funding applications. Upon request, provide technical assistance for non-County-funded affordable housing development projects.
Action 2-1c: Assist developers, faith-based and nonprofit organizations, or other qualified private sector interests with the application and development of projects. Allocate resources in the form of a dedicated County staff member to assist with entitlements, site identification, public facility fee waivers, and density bonuses.	Assist in supporting the development of at least 50 subsidized very low- and low-income income units over the planning period. Subject to funding availability, provide development subsidy for at least three affordable housing developments by December 2029. Prioritize subsidies for financing for rental housing units affordable to lower-income households and households with special needs. County staff member to assist as needed on an ongoing basis.
Action 2-1d: Ensure a streamlined process for affordable housing development that provides one-stop access to staff from the various County agencies involved in the development process.	Maintain current information on the development process, potential fee reductions, and density bonus on the County’s website.
Action 2-1e: Work with the Stanislaus Urban County partners to close out the Neighborhood Stabilization Program (NSP) in a manner that retains the County’s portion of the funds for supporting housing, including	Ongoing.

Actions	Objective and Timeframe
infrastructure needed to support the preservation of existing housing and the development of new housing opportunities.	
Action 2-1f: Continue to support partnerships with Community Development Corporations as a means of attracting different sources of funding and creating innovative funding models to support housing development.	Meet with at least one Community Development Corporation annually.
Action 2-1g: As authorized by the Board of Supervisors, complete the necessary environmental review needed to allow for housing development within the Salida Community Plan.	Conduct the environmental review and complete environmental review within three years of BOS authorization.
Action 2-1h: Modify, as needed, the Public Facility Fee waivers or deferrals to apply to affordable farmworker housing.	Review the County's Public Facilities Fees Administrative Guidelines by December 2025 for needed modifications and present modifications to the Public Facilities Fees Committee by December 2025.
Action 2-1i: Provide technical assistance to prospective developers interested in developing housing for extremely low-income ELI households. Defer Public Facility Fees for housing developments providing ELI housing. Advocate for providing prioritization in RFP scoring for affordable housing developments providing 50 percent or more ELI housing units.	Hold two meetings for developers interested in affordable housing for ELI households to provide technical assistance. Defer the PFF fees for two housing developments providing 50 percent or more ELI units. Bring a scoring preference for ELI priority to the Community Development Committee by 2026.
Implements the Following Policies	2B, 2C, 2D, 2E
Responsible Agency	County Planning & Community Development County Behavioral Health and Recovery Services County Community Services Agency Chief Executives Office
Funding Sources	Federal, State, and Local Funding

Program 2-2 Density Bonus

The County offers residential density bonuses to encourage affordable housing development. The County can grant a number of incentives in exchange for a portion of a development being dedicated for units affordable to lower- and moderate-income households, senior or student housing, or installing on-site childcare. These incentives include density bonuses over the otherwise allowed maximum density, reductions in parking standards, regulatory concessions, and waivers to development standards. These units must remain affordable for a period of no less than 55 years and each project must enter into an agreement with the County and be monitored by the Housing Services Division to ensure compliance.

The County's current Density Bonus was adopted in 2015 and must be updated to be consistent with State law.

Stanislaus County
2023-2031 Housing Element Update

Actions	Objective and Timeframe
Action 2-2a: Update the Density Bonus Ordinance to bring it into compliance with State law and remove the requirement for Planning Commission approval of Density Bonus applications.	Adopt updated Density Bonus Ordinance by December 2025.
Action 2-2b: As part of Density Bonus Ordinance update, discuss incentives and concessions with qualified housing developers to determine if increasing density bonus for market-rate projects beyond state law is appropriate for the County. This is specific to projects that already meet the State required percentage of affordable units at the time of application.	Meet with four qualified housing developers by June 2025, prior to updating the Density Bonus Ordinance.
Action 2-2c: Ensure that housing developers are informed about the County's density bonus program during pre-development conferences, inquiries, and at application and highlight the additional development potential available.	Ongoing on a case-by-case basis.
Action 2-2d: Provide technical assistance to developers on how to use the Density Bonus incentives. Promote density bonus for childcare facilities.	Meet with one qualified developer annually to provide information on the County's Density Bonus program. Maintain current information on the County's website, including notice of the Density Bonus update within one month of adoption.
Implements the Following Policies	2B
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 2-3 Housing Choice Vouchers

The Housing Choice Voucher (HCV) Program is the federal government's major program for assisting families with very low income and people who are elderly and/or have disabilities to afford decent, safe, and sanitary housing in the private market. This program is administered by the Stanislaus Regional Housing Authority (SRHA). Under this program, very low-income renters receive rental assistance so they can afford housing obtained in the private market without becoming rent burdened.

Actions	Objective and Timeframe
Action 2-3a: Refer HCV holders to a list of properties compiled by SRHA that are actively participating in the Housing Choice Voucher Program.	Provide a link to the SRHA "For Rent" directory on the County's website by December/June 2025.
Action 2-3b: Ensure potential tenants and landlords or property managers are informed of the California Fair Employment and Housing Act (FEHA) prohibiting housing discrimination based on source of income (including housing choice vouchers).	Require any County contracted fair housing providers to disseminate information about FEHA by December/June 2025.
Action 2-3c: Partner with the Stanislaus Regional Housing Authority (SRHA) to increase landlord participation in HCV programs by conducting landlord education and outreach on the program and source of income discrimination.	Partner with SRHA to make HCV program fact sheet available at County offices serving the general public and on the County's website. Provide fact sheets to property owners seeking building permits for ADUs.
Action 2-3d: Provide support to SRHA as necessary to seek additional funding that can be used, in addition to HCV funds, to provide subsidies to lower-income households to bring monthly rents in line with affordability guidelines, or help with moving	Meet with SRHA by June 202 65 to identify funding needs and opportunities.

Actions	Objective and Timeframe
costs, security deposits, or application fees.	
Implements the Following Policies	2C
Responsible Agency	County Planning & Community Development County Community Services Agency
Funding Sources	Federal and State Funding

Program 2-4 Support Homeownership Opportunities

The County recognizes that homeownership allows households to gain housing security and build wealth through equity and can serve to strengthen and stabilize neighborhoods.

Actions	Objectives and Timeframe
Action 2-4a: Continue to identify and pursue federal, state, and regional programs to move very low-, low-, and moderate-income families from renters to homeowners, such as HUD's Homeownership Voucher Program, down payment and closing cost assistance, mortgage financing, and mortgage credit certificates for homebuyers.	Annually identify potential funding sources and, where eligible, pursue funding either directly or by supporting other agencies in their efforts to secure funding. Work with partner agencies to establish an information network connecting potential homeowners to funding sources.
Action 2-4b: Partner with local nonprofit agencies to provide pre-purchase home buying counseling for residents to provide information on mortgage readiness, fair housing education, budgeting for a mortgage payment, credit education, money management, and identifying and avoiding predatory lending.	Provide homebuying counseling to at least 20 residents annually. Coordinate with a least one non-profit organization or employment-related organization, such as teachers' associations, school districts, and community-based service providers to increase awareness of, and access to, housing resources and financial planning services.
Implements the Following Policies	2A
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State Funding

Program 2-5 Housing Trust Fund

To increase funding available for affordable housing development and/or maintenance, the County will study the feasibility of establishing a Housing Trust Fund.

Actions	Objective and Timeframe
Action 2-5a: Conduct a feasibility analysis of establishing a local Housing Trust Fund. Study should include analysis of available resources, potential for impact, prioritization of use of funds (i.e., income targeting, rental vs. ownership projects).	Complete feasibility analysis by December 2025; depending on results of analysis, establish trust fund by December 2026.
Implements the Following Policies	2D
Responsible Agency	County Planning & Community Development County Executive Office
Funding Sources	Federal and State Funding

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

Stanislaus County's Land Use Policies have long recognized the need to balance conservation of agricultural land with the need for urban development. While the County's General Plan identifies areas suitable for residential development, there are constraints to developing in the unincorporated areas and, as such, the County recognized that, with some exceptions, development may be better suited to occur within the incorporated areas.

To facilitate development of affordable housing countywide, the County offers deferrals and waivers of its Public Facilities Fees for qualified affordable housing projects to projects regardless of their locations (incorporated or unincorporated) and has partnered with cities and affordable housing developers to assist with the funding of housing developments located within cities. This monetary support has aided the capacity of cities to meet their RHNA obligation without a reduction in the County's overall RHNA obligation.

Recognizing that the need to increase housing opportunities of all types extends beyond jurisdictional boundaries, the County initiated the Housing Stanislaus Initiative in 2021 with the goal of developing a common vision for housing in Stanislaus County. The desired outcomes of the Initiative are to:

- Establish a shared understanding of the needs, challenges, and opportunities associated with housing in Stanislaus County;
- Develop a unified and actionable countywide vision and strategy framework inclusive of priorities, policies, and investments – for accelerating affordable and market-rate housing in Stanislaus County; and
- Identify and prioritize projects and programs for housing development.

Set to be released in late 2023, strategies emerging from the Housing Stanislaus Initiative effort include the need to:

- Increase capacity within public agencies to keep pace with housing demand and enable more proactive engagement with developers;
- Pursue ongoing refinement of policies, procedures, and regulations that result in mutual benefit to community, public agency, and development applicant;
- Create access to capital, with a focus on capital for affordable and workforce housing;
- Prepare development plans for new areas appropriate for housing and for upgrading infrastructure in existing areas to accommodate housing use;
- Proactively engage developers and property owners of vacant and underutilized properties to encourage their pursuit of housing development; and
- Foster the development of a variety of housing types.

The emerging strategies reflect stakeholders of all interests that have shared their ideas on how local housing needs should be addressed.

Another County-led regional initiative has been Stanislaus 2030 a public-private partnership that aims to advance a shared vision for economic prosperity for all. The culmination of the first phase of Stanislaus 2030 was the 2022 publishing of the Investment Blueprint which includes the highest-leverage opportunities that will move the region's economy forward in the coming decades. The County's regional initiatives recognize the needed balance between jobs and housing in order to have a healthy and strong community.

The County's regional collaborations have also included 20+ years of partnership with various cities for HUD entitlement funding. As the lead entity for the Stanislaus Urban County, the County partners with the cities of Ceres, Hughson, Newman, Oakdale, Patterson, and Waterford for Community Development Block Grant and Emergency Solutions Grant funding. The City of Turlock and the Stanislaus Urban County have partnered as the City of Turlock/Stanislaus County HOME Consortium for HOME Investment Partnership funding, with Turlock serving as the lead entity. Effective July 1, 2023, the County has taken on the role as the lead entity for the new Stanislaus HOME Consortium; a continued partnership between the Stanislaus Urban County and the City of Turlock. The County is also the administrator of the Permanent Local Housing Allocation (PLHA) funding allocated by the State of California on the basis of the 2017 HUD entitlement to the Stanislaus Urban County.

Actions	Objective and Timeframe
Action 2-6a: Incorporate the sharing of the Regional Housing Needs Allocation (RHNA) into the Local Agency Formation Commission (LAFCo) Sphere of Influence (SOI) negotiation process and annexation requests, recognizing the loss of County housing opportunities within the SOI area and County funding provided for housing projects within the city limits.	Establish criteria to be used by the County in negotiating RHNA sharing during LAFCO SOI negotiation and annexation requests by January 2026.
Action 2-6b: Participate in policy and program development with cities and other regional agencies to implement Housing Stanislaus strategies and to prioritize funding for affordable housing projects and infrastructure needed to preserve existing housing and support new housing.	Annually meet with staff from cities and other regional agencies to assess implementation of Housing Stanislaus strategies, share successful practices, and troubleshoot ongoing challenges.
Action 2-6c: Continue to collaborate with cities and other regional agencies to implement Stanislaus 2030.	Annually, evaluate opportunities to incorporate 2030 strategies into housing program implementation.
Action 2-6d: Assemble an ongoing advisory committee to monitor progress and foster implementation of the Housing Stanislaus Initiative strategies.	Establish an advisory committee by December 2025.
Action 2-6e: Continue coordination within County agencies (Behavioral Health and Recovery Services, Community Services Agency, and Planning) to address the continuum of housing needs (i.e., "homelessness to homeownership").	Annually convene a meeting with all three County agencies to discuss respective housing programs/efforts with an aim at aligning and leveraging efforts.
Action 2-6f: Continue to collaborate with funding agencies and non-profit housing developers and public service providers for the development of permanent supportive housing.	In coordination with the CSOC, annually provide an opportunity for non-profit housing developers, public service providers, and funding agencies to share successful practices, and troubleshoot ongoing challenges with an aim at expanding opportunities for collaboration within the community.
Implements the Following Policies	2E, 2F
Responsible Agency	County Planning & Community Development County Behavioral Health and Recovery Services County Community Services Agency Chief Executive Office
Funding Sources	Federal and State Funding; Department Revenues

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

Policies

- 3A Diversity of Housing Types:** The County shall continue to implement land use policies and investigate amended policies that allow for a range of residential densities and housing types, prices, ownership, and size, including low-density single family uses, moderate-density townhomes, and higher-density apartments, condominiums, transit-oriented developments, live-work units, Accessory Dwelling Units (ADUs), and units in mixed-use developments.
- 3B Provide and Maintain Adequate Sites to Accommodate the RHNA.** The County shall maintain appropriate land use designations and densities to accommodate an increased supply of housing units by type, cost, and size to meet its share of the regional housing need in alignment with countywide housing priorities.
- 3C No Net Loss Zoning:** The County shall make findings related to the potential impact on the County's ability to meet its share of the regional housing need when approving discretionary entitlements to rezone residentially designated properties or develop a residential project with fewer units or at a higher income than what is assumed for the site in the Housing Element Sites Inventory, consistent with zoning requirements in Government Code Section 65863.
- 3D Streamline Housing Entitlement and Permitting Process.** The County shall streamline the housing approval and permitting process, particularly for affordable housing, throughout County departments.
- 3E Clear Development Standards and Approval Procedures:** The County shall create and administer clear objective development standards and approval procedures for a variety of housing types, including, but not limited to, multifamily housing and emergency shelters.
- 3F Facilitate Infill Development.** The County shall utilize infill development strategies to further develop and improve existing neighborhoods with the infrastructure to serve new development.
- 3G Facilitate Strategic Development on Large Lots.** The County shall support and facilitate strategic development on large lots to promote cohesive and connected development that provides housing for a variety of household incomes and types.
- 3H Residential Uses Close to Services:** The County shall encourage development of residential uses close to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.
- 3I Compatible Development of Underutilized Sites:** The County shall encourage compatible residential development in areas with underutilized non-agricultural lands.
- 3J Flexible Standards and Regulations:** The County shall allow flexibility within the County's standards and regulations to encourage a variety of housing types.
- 3K Adaptive Reuse:** The County shall support innovative strategies for the adaptive reuse of residential, commercial, and industrial buildings to provide for a variety of housing types and residential uses.
- 3L Residential Sites Inventory:** Maintain a vacant and underutilized residential sites inventory and assist residential developers in identifying land suitable for residential development.

- 3M Preserve Multifamily Land Use:** Preserve the existing supply of land that allows multi-family dwellings and discourage development on such land at lower residential densities or with solely nonresidential land uses.
- 3N Infrastructure Development.** The County shall continue to utilize its HUD CDBG funding allocation, and seek new funding, for infrastructure needed to upgrade existing areas as a means of preserving existing housing units and to accommodate new housing uses.
- 3O Development within Cities:** The County will continue to work with cities to leverage available funding for the development of affordable housing projects throughout Stanislaus County.
- 3P Public Facility Fee Waivers:** The County shall continue to waive Public Facilities Fees for qualified affordable housing projects to be developed throughout Stanislaus County.

Programs

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

The unincorporated County share of the RHNA is 2,475 units for the 2023-2031 Housing Element planning period. With anticipated pipeline projects and projected ADUs, a total of 437 units can be credited toward the County's RHNA. The remaining 2,072 RHNA units (574 very low-, 398 low-, 458 moderate-, and 608 above moderate-income units) must be accommodated through adequate sites planning.

Actions	Objective and Timeframe
Action 3-1a: Maintain an updated inventory of housing sites and actively promote sites available for lower- and moderate-income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations.	Publish on the County's website by June 2025 and update annually after submitting the County's Annual Progress Report every April.
Action 3-1b: Actively promote sites available for affordable housing development to potential developers, private and nonprofit organizations, and other interested persons and organizations.	Send annual notices promoting the Housing Elements Sites Inventory and offering to meet with developers to discuss affordable housing development.
Action 3-1c: Maintain an updated list of residential housing developments that have been submitted, approved, and denied throughout the housing cycle. Comply with California law regarding reporting requirements including, without limitation, annual reporting in accordance with Government Code Section 65400.	Publish by June 2025 and update annually as part of the Annual Progress Report.
Action 3-1d: The County has identified two four parcels of County-owned land for the development of affordable housing: one in Empire (APN 133-017-006) and three in Keyes (APN 045-065-044, 045-064-057, and 045-064-058). The County will comply with the Surplus Land Act in the disposition of all publicly owned land including those two parcels in the site inventory. Once agreements are in place for development and disposition of those properties, the County will prioritize entitlement processing and building permit issuance, and if appropriate, commit funding. Consistent with Program 3-2 (No Net Loss Zoning), the County will monitor all sites in the inventory and if development is not occurring in line with assumptions sufficient to keep on track to meet the share of the RHNA, the County will identify alternative sites.	<p>Development and disposition of publicly owned inventory sites: The County expects to enter into a development and disposition agreement for the site in Empire (APN 133-017-006) by the end of 2025. The County will begin the development and disposition process for the Keyes site (APN 045-065-044, 045-064-057, and 045-064-058) in January 2026. Both sites are expected to yield 22 units of affordable housing.</p> <p>Report on identified surplus land in the Housing Element Annual Progress report on an annual basis.</p> <p>Monitor sites annually in accordance with Program 3-2. If needed, identify an alternative site by January 2028.</p>

Stanislaus County
2023-2031 Housing Element Update

Actions	Objective and Timeframe
Action 3-1e: Amend Zoning Ordinance to prohibit development of single-family dwellings in multifamily zones or land use designations.	Adopt Zoning Ordinance amendment by June 2025.
Action 3-1f: Proactively engage property owners of vacant and underutilized properties to encourage their pursuit of housing development.	Send annual notices to property owners of vacant and underutilized sites listed on the Sites Inventory offering to meet with them to discuss development options for their property.
<p>Action 3-1g: Rezone sites with minimum density and development standards enumerated in Housing Element Law, Government Code Section 65583.2 (h) and (j), to facilitate achieving maximum densities and to accommodate the County's shortfall of capacity in the 6th cycle Housing Element Sites Inventory (972 lower-income units and 233 moderate-income units). Rezone sites shall be subject to the following standards:</p> <ul style="list-style-type: none"> ▪ Permit owner-occupied and rental multi-family uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. "By-right" means approval without discretionary review. ▪ Permit the development of at least 16 units per site. ▪ Establish a minimum density of 20 units per acre and a maximum density of at least 20 units per acre for all rezone sites to accommodate lower-income RHNA. ▪ Ensure that either: a) at least 50 percent of the shortfall of low- and very-low-income regional housing need can be accommodated on sites designated for exclusively residential uses; or b) if accommodating more than 50 percent of the low- and very-low-income regional housing need on sites designated for mixed uses, all sites designated for mixed uses must allow 100 percent residential use and require that residential uses occupy at least 50 percent of the floor area in a mixed-use project. 	Complete all necessary General Plan and Zoning Ordinance text and map amendments by August of 2025.
Action 3-1h Amend the Zoning Ordinance to remove the 6,000 square foot minimum lot size and 65-foot-wide lot width requirements in R-3 zones to allow housing to be developed at a higher density. Remove the minimum lot and depth requirements in R-A zones and amend the R-2 ordinance to allow for additional housing types.	Adopt Zoning Ordinance amendment by December June 2025.
Action 3-1i: Amend the Zoning Ordinance to allow for increased residential development on irregular and smaller lots in existing communities, including: reducing the minimum lot size required for residential development in the R-1, R-2, and R-3 Zoning districts; increasing lot coverage maximums in the R-1, R-2, and R-3 Zoning districts; and allowing for the development of up to 14 dwelling units per acre ministerially in the R-2 zoning district.	Adopt Zoning Ordinance amendment by December 2025.
Action 3-1j Support a variety of housing types in RCAA areas through encouraging ADU production and the maintenance of existing units through implementation of the Rehab program.	Develop 35 ADUs in RCAA areas throughout planning period; target use of rehab funding in RCAA area by June 2026.
Implements the Following Policies	3A, 3B, 3D, 3K, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-2 No Net Loss Zoning

Government Code Section 65863, otherwise known as “No Net Loss” law, prevents the loss of existing housing and land available for future discretionary residential development by ensuring that cities and counties “identify and make available” additional adequate sites if a housing project is approved with fewer units by income category than what is identified in the Housing Element to meet RHNA. In compliance with State law, the County will expand and improve upon the ongoing no net loss efforts to develop a procedure to track:

- Unit count and income/affordability assumed on parcels included in the sites inventory
- Actual number of units achieved and income/ affordability when parcels are developed
- Net change in capacity and summary of remaining capacity in meeting remaining RHNA

Unit count and income/affordability are identified in the Sites Inventory.

Actions	Objective and Timeframe
Action 3-2a: Monitor inventory sites throughout the duration of the planning period to ensure the County remains on track towards satisfying its RHNA target for all income levels.	Monitor development of inventory sites at least annually with submittal of Annual Progress Report every April.
Action 3-2b: Maintain an administrative list of additional sites with appropriate zoning that can be added to the County’s Sites Inventory if and when an analysis provided the Annual Progress Report indicates that sufficient sites may not exist to accommodate the County’s remaining RHNA, by income level, for the planning period.	Create list by December 2025 and update annually as needed.
Action 3-2c: If development of inventory sites does not occur at densities assumed in the sites inventory during the planning period, identify alternative sites from the County’s administrative list of additional sites with appropriate zoning.	Rezone sufficient sites within six months of identification of the shortfall.
<p>Action 3-2d: Regularly review Measure E to evaluate its effect on the County’s ability to meet its housing needs. As a result of the bi-annual Measure E evaluation, the County may identify Measure E-impacted lands within a LAFCO adopted Sphere of Influence or an adopted County Community Plan area for rezoning, and will pursue approval from HCD to activate the exemption from County voter approval. An exemption of up to ten (10) acres per year for residential use may occur when HCD certifies in writing that all of the following circumstances exist:</p> <p>(a) the approval is necessary and required to meet the County’s legal fair share housing requirement; and</p> <p>(b) there is no other land in the County or the cities in the County already designated for urban use that can accommodate the County’s legal fair share housing requirement.</p> <p>Additional acreage may be designated for residential use if the Board finds, and HCD certifies in writing, that the additional acreage is necessary to meet the Board’s legal fair share obligation based on maximum multi-family densities. Any proposal approved under this subsection shall be required to have all housing units permanently affordable to persons or families of very low-, low, and moderate-income.</p> <p>Any development project consisting entirely of farm worker housing is also exempt from requiring a vote of the electorate and does not include HCD certification.</p>	Review the sites inventory annually as part of the Housing Element Annual Progress Report to determine if additional sites are needed. Establish an administrative list of Measure E lands that could be utilized to meet housing needs by March 2025 and update annually as needed. If it is determined that a lack of adequate sites exist, Measure E exemptions may be triggered.
Action 3-2e: The County shall create and maintain a countywide	To ensure that developers are aware of all

Actions	Objective and Timeframe
inventory of potential residential infill sites. The inventory will include vacant and underutilized lots with residential zoning districts and commercial districts that allow residential uses. The County shall make this information available to the public by posting the inventory on the County's website and providing the inventory, upon request, to developers visiting the Planning Department.	potential multi-family residential sites, the inventory will be updated on an annual basis and notice of updates will be distributed to interested developers of record. Permit 250 units on infill properties within the planning period.
Implements the Following Policies	3B, 3C, 3M
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-3 Replacement Housing

Pursuant to AB 1397 (Adequate Sites) passed in 2017, the County will amend the Zoning Ordinance to require the replacement of existing residential units on nonvacant RHNA sites as a condition of discretionary project approval for development. Specifically, sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households, shall replace those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall also be consistent with those set forth in the State Density Bonus Law.

Actions	Objective and Timeframe
Action 3-3a: Amend the Zoning Ordinance to establish the replacement requirements pursuant to Government Code Section 65583.2(g)(3)).	Amend Zoning Ordinance by June 2025.
Implements the Following Policies	3C
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

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

Housing Element Law (Government Code Section 65583.2(c)) stipulates that inventory sites that were identified in prior housing elements may, in the 6th cycle, only count as available to accommodate the lower-income RHNA if they are rezoned for by-right development and require at least 20 percent of units in proposed projects on those sites be affordable to lower-income households. The County's Site Inventory does not include any sites that were used in previous Housing Element cycles. However, if additional sites must be identified per No Net Loss law (Program 3-2), and those sites were used in prior Housing Elements, the County will amend the zoning ordinance to include these provisions.

Actions	Objective and Timeframe
Action 3-4a: Pursuant to Government Code Section 65583.2 subdivisions (c), amend the Zoning Ordinance to establish standards for any sites the County may identify during the planning period that meet the following criteria: <ul style="list-style-type: none"> ▪ A vacant site for RHNA identified in the previous two Housing Element cycles; or 	Amend Zoning Ordinance within six months of identifying sites that meet the criteria.

- A nonvacant site for RHNA identified in the previous Housing Element cycle.

Standards shall be as follows:

- Permit by right housing developments in which at least 20 percent of units as affordable to lower-income households;
- Permit the development of at least 16 units per site; and
- Ensure sites permit a minimum density of 20 dwelling units per acre.

Implements the Following Policy	3K
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-5 Adaptive Reuse

In recognition of older commercial buildings that may no longer be occupied by the highest and best uses or compatible uses with its surrounding neighborhoods and that the economic impacts of the COVID-19 pandemic may have further accelerated the decline of these properties, the County will pursue opportunities to establish alternative regulations for the conversion of existing buildings to other uses.

Actions	Objective and Timeframe
Action 3-5a: Evaluate, and if appropriate, amend the Zoning Ordinance to remove potential constraints for adaptive reuse, such as review/approval process and minimum parking standards. Promote adaptive reuse to property owners and interested developers through public outreach.	Evaluate the Zoning Ordinance by June 2025 and, if necessary, revise Zoning Ordinance within one year.
Implements the Following Policy	3L
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-6 Zoning for a Variety of Housing Types

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, smaller-scale multi-family housing in existing single-family neighborhoods, manufactured housing, supportive and transitional housing, single-room occupancy units, residential care facilities, and emergency shelters. This program, by allowing a wider range of housing types in all neighborhoods, would also provide for a variety of housing prices, styles, and sizes, which contributes to neighborhood stability by offering more affordable and move-up homes and accommodating a diverse mix of incomes.

Actions	Objective and Timeframe
Action 3-6a: Amend Zoning Ordinance standards to allow for housing options that provide greater flexibility and affordability in the housing stock. This may include allowing shelters, transitional housing, and tiny homes with wraparound services on land owned by faith-based organizations, social services agencies, and nonprofits that do this work in the community and on publicly owned land.	Conduct stakeholder meetings by December 2025 to identify options and, if viable options are identified, amend Zoning Ordinance by December 2026. Provide staffing resources to provide technical assistance to faith-based organizations seeking to develop affordable housing.
Action 3-6b: Review all residential zoning districts and land use designations for additional development in low-density neighborhoods.	Complete review by December 2025 and amend Zoning Ordinance by December 2026.

Actions	Objective and Timeframe
Amend the Zoning Ordinance to allow, by right or via streamlined review process, a mix of dwelling types and sizes, specifically “missing middle” housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) in lower-density residential areas.	
Action 3-6c: Amend the Zoning Ordinance to remove the requirement for a conditional use permit for residential care facilities for seven or more persons in all zones that allow residential uses, subject only to provisions for residential uses of the same type in the same zone regardless of licensing . Establish objective standards for large and small residential care facilities to provide certainty to applicants through the permitting process. Amend the zoning ordinance to include a definition that defines residential care homes for six or fewer residents as a residential use.	Amend Zoning Ordinance by June 2025.
Action 3-6d: Amend the Zoning Ordinance to comply with Government Code Section 65661 which requires: <ul style="list-style-type: none"> ▪ A Low Barrier Navigation Center to be a use by-right in areas zoned for mixed-use and nonresidential zones permitting multifamily uses, provided specific requirements of the law are met; and ▪ Amend the definition of “emergency shelters” to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care. 	Amend Zoning Ordinance by June 2025.
Action 3-6e: Amend the Zoning Ordinance definitions of “multiple dwellings” and “dwelling groups” for clarity and consistency.	Amend Zoning Ordinance by DecemberJune 2025.
Action 3-6f: Amend the Zoning Ordinance to define Single-Room Occupancy developments as a permitted residential use in multifamily districts. Establish development standards for SROs that facilitate development.	Amend Zoning Ordinance by DecemberJune 2025.
Action 3-6g: Amend the Zoning Ordinance to address the requirements of SB 9, including developing objective design standards for qualifying projects.	Amend the Zoning Ordinance by DecemberJune 2025.
Action 3-6h: The County will promote other types of alternative housing options including single-room occupancy developments or conversions, group homes, and permanent supportive housing.	Ongoing on a case-by-case basis.
Action 3-6i: Amend the Zoning Ordinance to allow for mobile homes in the Historical Site (HS) zoning district, subject to allowable aesthetic and architectural requirements as those required for conventional dwellings.	Amend the Zoning Ordinance by DecemberJune 2025.
Action 3-6j: Amend the Zoning Ordinance to develop specific parking standards based on unit size in multifamily buildings.	Amend the Zoning Ordinance by DecemberJune 2025.
Implements the Following Policy	3D, 3E, 3F, 3G, 3N
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenue

Program 3-7 Expedited Project Review

The County continues to improve the efficiency of the development review process. As a response to the housing shortage in the State of California, Government Code Section 65920 was amended to restrict local rules that limit housing production. Amendments to Government Code Section 65920 changed the Permit Streamlining Act by creating a more ministerial, rather than discretionary, two-step application process for housing projects. The County will continue to identify efficiencies for the

development process in line with Government Code Section 65920 a. The County will also coordinate with developers to ensure a timely application and development process.

Actions	Objective and Timeframe
Action 3-7a: Continue to offer a free Pre-Application Review process for developers. This review provides developers with a preview of potential issues the proposed development that could result in major costs before they spend money developing plans and submitting an application.	Ongoing on a case-by-case basis.
Action 3-7b: Assess existing processes in order to identify streamlining opportunities, such as ministerial review for projects that include a percentage of affordable housing units.	Assess existing processes by January 2025 and, if opportunities to streamline are determined feasible, revise the process within one year.
Action 3-7c: Update the County's permit process to comply with AB 2011 (Wicks, 2022) which allows for ministerial, by-right, approval for affordable housing on commercially zoned lands, and also allows such approvals for mixed-income housing along commercial corridors, as long as the projects meet specified affordability, labor, and environmental criteria.	Update the permit process to comply by January 2026.
Action 3-7d: Maintain staffing assigned to the One-Stop-Shop at a capacity level adequate to keep pace with demand and enable more proactive engagement with developers.	Assess staffing capacity with all One-Stop-Shop partners annually.
Action 3-7e: Implement a web-based interactive permit guide that outlines a step-by-step process for residential development including: identifying steps in the entitlement and building permit process, detailed information on development incentives, and funding programs and resources for affordable housing development.	Fully implement use of a web-based interactive permit guide by June 2025.
Action 3-7f: Develop objective design standards for housing development that will help the County meet RHNA obligations, including, but not limited to, multifamily housing, ADUs, SROs, duplexes, and triplexes, while providing a streamlined permitting process.	Adopt objective standards, as necessary, by June 2025.
Action 3-7g: Amend the Zoning Ordinance to address updates to SB 35 and create written procedures for the Streamlined Ministerial Approval Process.	Amend Zoning Code and create written procedures by June 2025.
Implements the Following Policies	3D, 3E, 3C, 3Q
Responsible Agency	County Planning & Community Development County Public Works County Department of Environmental Resources County Fire Warden
Funding Sources	Department Revenues

Program 3-8 Accessory Dwelling Units

Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) represent an important opportunity to create more affordable housing for lower and moderate-income households. This program will promote and facilitate the development of ADUs throughout the unincorporated County.

Actions	Objective and Timeframe
Action 3-8a: Conduct a marketing campaign to disseminate existing ADU	Advertise the County's ADU planning tools

Actions	Objective and Timeframe
planning tools, including the County's ADU information website, interactive permit guides, ADU email list, and pre-approved ADU plans.	on social media on a biannual basis. Facilitate the development of 184 ADUs over the planning period.
Action 3-8b: Work with organizations, such as community development corporations, to identify gap funding for lower-income homeowners to build ADUs, or to develop or preserve ADUs for income-qualified tenants.	Evaluate the feasibility of using PLHA funds for this purpose by June 2025.
Action 3-8c: Partner with an organization involved in affordable housing or community development activities to provide informational workshops to property owners about the ADU permitting and building process. Target outreach to property owners in low- and moderate-resource areas and provide workshops and materials appropriate for residents with limited English proficiency.	Facilitate one workshop annually with the objective of facilitating at least 45 ADUs in low- and moderate-resource areas.
Action 3-8d: Through public-facing materials and outreach activities, promote the development of ADUs in high-resource areas and Racially Concentrated Areas of Affluence like Salida, East Oakdale, and Hickman.	Facilitate the development of at least 45 ADUs in high-resource areas.
Action 3-8e: Monitor ADU production on an annual basis to ensure that they are satisfying the construction targets adopted to meet RHNA obligations. Monitor review times for ADU and JADU permit applications and, if necessary, implement process improvements and promote the availability of ADU technical assistance to key community stakeholders (e.g. loan providers). If development is falling short of assumptions, modify development standards, consider reducing fees beyond state law.	Promote development of ADUs with a goal of issuing building permits to 184 ADUs during the planning period (or 23 ADUs permitted per year). Review permit processing times for ADUs by January 2027 and implement any needed streamlining actions by January 2028. Monitor production and affordability levels on an annual basis. If the County is trending to miss its target by December 2027, modify and/or develop new incentives to promote ADU development by December 2028, including identifying additional sites or rezoning to accommodate the RHNA.
Action 3-8f: The County will continue to make available pre-approved ADU plans on the County website and will post on the County's website ADU plans provided by the private sector in accordance with state ADU law.	Post all available ADU plans by February 2025 and update as new requests are received.
Action 3-8g: Incentivize the creation and affordability of ADUs by utilizing PLHA and partnering with a local lending institution or Community Development Financial Institution (CDFI) to develop an ADU financing assistance program for Urban County cities targeting assistance in Racially Concentrated Areas of Affluence.	Develop new incentives to promote affordable ADU development by December 2028.
Implements the Following Policy	3J, 3K
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State funding.

Program 3-9 Infrastructure

Infrastructure availability is crucial to the development of housing to meet the County's share of the RHNA. This program will facilitate the prioritization and expansion of services for affordable housing projects.

Actions	Objective and Timeframe
Action 3-9a: Transmit notice of Housing Element adoption to all sewer and water providers serving the unincorporated County area.	Send notice of adoption of the Housing Element to service providers within one month of certification.
Action 3-9b: Continue to assess and prioritize the infrastructure needs of underserved communities.	Annually review and update infrastructure prioritization studies.
Action 3-9c: Continue to prioritize the use of the County's portion of HUD entitlement funding for sewer and water infrastructure projects.	Complete the Rouse/Colorado and Spencer/Marshall areas of the West Modesto sewer project by the end of the planning period. Evaluate funding needs as part of the five-year Consolidated Plan update process.
Action 3-9d: Meet with cities with unincorporated pockets of unincorporated residential development within their LAFCO-adopted Sphere of Influence to assess the feasibility of Tax Increment Financing Districts and Enhanced Infrastructure Financing Districts being used to support housing development.	Meet with the cities and complete an assessment by June 2026 and report results as part of the Annual Progress Report. <u>If determined feasible, draft a strategic plan to implement and utilize Tax Increment Financing mechanisms to facilitate residential growth by December 2031.</u>
Action 3-9e: Implement a fee schedule that assesses fees on single-family and multi-family homes proportional to their impact, pursuant to State law.	Conduct a study to evaluate the infrastructure impact of single-family and multi-family homes and update the fee schedule by June 2026.
Action 3-9f: Explore opportunities to increase accessible transit options throughout unincorporated Stanislaus County to facilitate housing mobility for lower-income families.	Conduct a mobility study for unincorporated Stanislaus County by January 2028.
Action 3-9g: <u>The County will work with water and sewer providers to monitor that there is sufficient water resources and sewer treatment capacity to meet the projected housing need throughout the planning period.</u>	On a project-by-project basis, maintain an open dialogue with utility districts to discuss and evaluate available resources and strategies to conserve water consumption and expand resources to meet the County's projected housing needs. Annually with the publication of the County's Annual Progress Report, monitor the availability of water to serve future projects on identified sites to accommodate the County's share of the RHNA.
Action 3-9h: <u>Continue to seek grant funding to construct infrastructure improvements.</u>	<u>Seek grant funding annually throughout the planning period, beginning in June 2025.</u>
Action 3-9i: <u>Review policies and guidelines of service providers for compliance with Government Code Section 65589.7 and encourage providers to update policies and procedures to consider low-income and special needs housing developments.</u>	<u>Provide comments to service provider guidelines and procedures by December 2026. If necessary, reach out to service providers to encourage policy updates.</u>
Action 3-9j: <u>Revise the County's infrastructure priority project list as infrastructure projects are completed, prioritizing projects with the greatest health and safety needs.</u>	<u>Review the priority project list for infrastructure improvements after every project completion.</u>
Implements the Following Policies	30
Responsible Agency	Public Works Department County Planning & Community Development County Executive Office
Funding Sources	State and Federal Funding, Department Revenues

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

Policies

- 4A Address Special Housing Needs:** The County shall address the housing needs of special populations and extremely low-income households through emergency shelters, transitional housing, and supportive housing.
- 4B Housing and Supportive Services:** The County shall promote housing and supportive services for households with special needs including seniors, persons with disabilities, single parents, and individuals experiencing homelessness.
- 4C Reasonable Accommodation:** The County shall continue to implement a reasonable accommodation process for persons with disabilities to request exceptions or modifications of zoning, permit processing, and building regulations to ensure housing is accessible.
- 4D Support Stanislaus Community System of Care (the local Continuum of Care):** The County shall support the local Continuum of Care in its efforts to meet the needs of homeless families and individuals.
- 4E Support Organizations Serving the Homeless Community:** The County shall support the efforts of non-profit and community organizations that provide emergency shelter and other assistance for the homeless population, including alcohol and drug recovery programs.
- 4F Range of Housing for Seniors:** The County shall facilitate and encourage the development of a range of housing types for seniors from which support services are readily accessible.
- 4G Family Housing:** The County shall encourage the development of housing that provides for families with children (such as larger rental and ownership units for lower- and moderate-income families) and the provision of services such as childcare and after-school care when feasible.
- 4H Universal Design Standards:** The County shall implement universal design standards or guidelines that promote accessibility for everyone regardless of age or physical ability.

Programs

Program 4-1 Housing for Special Needs Populations

Government Code Sections 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.

The County of Stanislaus is a diverse community with many residents who have special housing needs. State law requires the housing element to address the needs of specific groups with special housing needs, including extremely low-income residents, seniors, persons with disabilities, large families, female-headed households with children, and persons experiencing homelessness. The County will continue to monitor its policies, standards, and regulations to ensure that they comply with applicable laws pertaining to housing for special needs populations.

Actions	Objective and Timeframe
Action 4-1a: Establish a scoring criterion for affordable housing projects that encourage the inclusion of units and services needed to support individuals with special needs.	Amend funding policies to establish criteria that encourage special needs housing by June 2025.
Action 4-1b: Adopt policies and procedures for the integration of universal design features, including those needed for persons with disabilities and their caregivers, in housing rehab and housing development projects, to the extent that funding allows.	Develop guidelines or standards by January June 2025.
Action 4-1c: Review the Reasonable Accommodations Ordinance and amend if needed.	Amend Zoning Ordinance by June 2025, if needed.

Actions	Objective and Timeframe
Action 4-1d: Continue to coordinate the housing efforts of the County's Planning Department, Community Services Agency, and Behavioral Health and Recovery Services to maximize leveraging of existing funding for special needs housing and services, and to build staffing capacity.	Meet regularly with County departments and regional agencies throughout the planning period.
Action 4-1e: Amend Zoning Ordinance to remove references to "nonprofit" in the definition of "family"	Amend Zoning Ordinance by January-June 2025 .
Implements the Following Policies	4A, 4B, 4C
Responsible Agency	County Planning & Community Development Community Services Agency Behavioral Health and Recovery Services
Funding Sources	Department Revenues

Program 4-2 Farmworker Housing

Actions	Objective and Timeframe
Action 4-2a: Continue coordinating with regional partners (County's Agricultural Advisory Board, Stanislaus Regional Housing Authority, agricultural producers, and community-based organizations) to identify changing needs for farmworker housing in the County. Assess current regulations and needs and make changes to the Zoning Ordinance if necessary.	Meet with stakeholders once within six months of Housing Element adoption and present the County's General Plan Update Committee with recommended amendments to the Zoning Ordinance, if any, within six months of the stakeholder meeting.
Action 4-2b: Assist property owners, builders, and non-profit housing developers with securing funding resources, identifying development opportunities, qualifying for density bonuses, and prioritizing infrastructure availability for farmworker housing projects.	Provide technical assistance to facilitate the development of at least 30 units of affordable farmworker housing by December 2031. Annually meet with stakeholders to identify community needs for farmworker housing and identify constraints in the development of farmworker housing.
Action 4-2c: Amend Zoning Ordinance to remove the requirements for a use permit for employee housing and allow ministerial approval for projects with less than 36 beds, in accordance with Health and Safety Code Section 17021.8.	Amend Zoning Ordinance by June/January 2025 .
Action 4-2d: Seek partnerships in providing farmworkers within the community trainings on housing rights to empower them to advocate for better living conditions and address housing concerns.	In partnership with a non-profit or community group serving farmworkers within the community, conduct an annual training on farmworker housing rights.
Action 4-2e: Actively partner with HCD and the UC Davis Western Center for Agricultural Health and Safety on their upcoming California Farmworker Housing Study, which is being conducted to fulfill the requirements of AB 1654 (2022).	Contact Western Center for Agriculture Health and Safety representatives within six months of Housing Element adoption. Once study is complete, work with UC Davis and other community partners to assess the feasibility of program implementation
Action 4-2f: Coordinate with the Farmworker Advisory Committee (approved by the Board of Supervisors November 12, 2024) to enhance understanding and visibility of housing issues facing the County's farmworker population and to share housing resources, such as fair housing service providers, the County's rehabilitation program , and code enforcement reporting. The committee would provide a forum for sharing information, resources, and gathering feedback on opportunities for improvement.	The establishment of a Farmworker Advisory Committee is a one-year pilot project, with a re-evaluation at the end of the year to assess its effectiveness. Staff will provide information to the committee as needed.
Action 4-2g: Work with agricultural businesses to provide housing	Conduct outreach to agricultural businesses

Actions	Objective and Timeframe
resources to their employees.	within the County to disseminate housing resources to farmworker employees by December 2026.
Implements the Following Policies	4A, 4G
Responsible Agency	County Planning & Community Development
Funding Sources	Department Revenues

Program 4-3 Homelessness

The County coordinates with cities, regional agencies, service providers, and the Stanislaus Community System of Care (CSOC, the local Continuum of Care), to address homelessness. The County will continue to coordinate with these agencies and service providers to implement the Regional Homeless Strategic Plan, while implementing policy solutions aimed at increasing availability of emergency shelters, transitional housing, and other housing types for people experiencing and transitioning out of homelessness.

Actions	Objective and Timeframe
Action 4-3a: When shown to be locally effective, promote home-sharing programs to connect homeowners with tenants and create income and housing opportunities for lower-income households, seniors, and persons with disabilities.	Provide information on home-sharing programs on the County's website and ensure service providers are connecting clients with home-sharing programs as appropriate.
Action 4-3b: Continue to support the Stanislaus Community System of Care (CSOC) in its efforts to coordinate with low-income housing producers and advocates, social service providers, representatives of public agencies, and other interested organizations in the implementation of the Regional Homeless Strategic Plan for Stanislaus.	Regularly participate in CSOC meetings and their related sub-committees to assist with providing technical support as needed.
Action 4-3c: Assess the County's capacity to accommodate individuals experiencing homelessness in unincorporated areas by comparing the most recent homeless point-in-time count to the number of shelter beds available Countywide on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing. If capacity is not sufficient, amend the Zoning Ordinance as necessary to continue to meet the County's unincorporated area need.	Bi-annually with release of the Point-In-Time count. If determined to be necessary, adopt zoning ordinance amendments within six months of publishing Point-In-Time Count.
Action 4-3d: Utilize federal and state funds, as available, to support homeless service providers that operate emergency shelters, and transitional, and supportive housing programs for the homeless and those who are at-risk of becoming homeless. Prioritize assistance in Empire, where the majority of homeless individuals in the unincorporated County require resources.	On an annual basis as part of the funding allocation processes, fund programs for homeless individuals and families and those at risk of becoming homeless, subject to available funding.
Action 4-3e: Amend the Zoning Ordinance to remove the 10 bed per zone limit and increase the size limit for emergency shelters to at least 20 beds per facility, pursuant to State law. Pursuant to AB 139, reduce the off-street parking requirements for emergency shelters to accommodate only sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.	Amend Zoning Ordinance by June 2025.
Action 4-3e: Amend the Zoning Ordinance to establish a process for	Amend Zoning Ordinance by June 2025.

Actions	Objective and Timeframe
allowing Permanent Supportive Housing in multi-family development by-right through a staff level permit.	
Implements the Following Policies	4D, 4E
Responsible Agency	County Planning & Community Development County Community Services Agency County Behavioral Health and Recovery Services
Funding Sources	Federal and State funding Department Revenue

Program 4-4 Community Outreach and Education

Community outreach is a key component to developing a comprehensive and inclusive housing market in the County. It is critical to engage local community groups and stakeholders from all sectors of the community to educate and provide inclusive housing opportunities and to understand housing needs. The goal of this program is to provide community groups that are affected by restrictions to fair and equitable housing greater opportunities for becoming informed and engaged in the County's housing and overall planning process.

Actions	Objective and Timeframe
Action 4-4a: Work with community groups and service providers to increase accessibility to public workshops by identifying suitable times, preferred meeting types (in person, virtual, or hybrid meetings), having meetings be accessible to persons with disabilities, and having meetings be accessible to nearby transit centers. (Environmental Justice)	Ongoing on a case-by-case basis.
Action 4-4b: Maintain a list of neighborhood groups and other community organizations that advocate for protected housing groups including seniors, individuals with disabilities, large households, multi-generational households, and other groups, and disseminate information about housing opportunities and participate in community meetings as requested.	Develop list by December/January 2025 and update contact information annually. Disseminate information on an ongoing basis as opportunities become available.
Action 4-4c: Develop a countywide language access policy to ensure residents with limited English proficiency have accessible information. (Environmental Justice)	Implement policy by January/June 2025.
Action 4-4d: Develop an outreach strategy building upon the Housing Stanislaus initiative for housing programs and community planning activities in an effort to increase participation. Collaborate with existing and new community stakeholders from all sectors and geographic areas to engage in the public participation process. Review the strategy annually to ensure all appropriate populations are reached. (Environmental Justice)	Develop an outreach strategy building upon the Housing Stanislaus initiative by December 2026 and review on an annual basis.
Implements the Following Policies	4D
Responsible Agency	County Planning & Community Development Chief Executive Office
Funding Sources	Federal and State Funding Department Revenues

Goal 5: Ensure fair and equal housing opportunities.

Policies

- 5A Fair Housing Services:** The County shall support services and programs that work to eliminate housing discrimination and ensure that residents are aware of their rights and responsibilities regarding fair housing.
- 5B Housing Discrimination:** The County shall support efforts within its control to prevent discrimination in the sale or rental of housing with regard to race, ethnic background, religion, disability, income, sex, age, and household composition.
- 5C Fair Housing Outreach:** The County shall continue to conduct fair housing outreach and education for unincorporated residents, property owners, and housing providers to ensure each understands their rights and responsibilities.
- 5D Rental Assistance:** The County shall continue to support rental assistance for lower-income households who have fallen behind on rent and need assistance on regaining or gaining housing stability.
- 5E Fair Chance Housing:** The County shall refer individuals with poor credit history, poor landlord referral/references, formerly incarcerated, or other mitigating circumstances to service providers who can assist them with housing opportunities.

Programs

Program 5-1 Affirmatively Furthering Fair Housing & Environmental Justice

AB 686 (2017, Santiago) requires each local government to administer its programs and activities related to housing in a manner that affirmatively furthers fair housing. The County will take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities. Chapter 3, *Affirmatively Furthering Fair Housing (AFFH)*, summarizes the fair housing issues and concerns in Stanislaus County based on findings of the County of Stanislaus Analysis of Impediments to Fair Housing Choice 2020-2025 (AI) and additional research conducted as part of this Housing Element update. Programs under this goal are designed to affirmatively reduce barriers to housing and increase equitable conditions across neighborhoods, addressing issues such as historic and existing racial and economic inequities, housing mobility and access, community investment and engagement, and environmental health. The findings of the AFFH analysis were used to develop meaningful actions and metrics and milestones that promote inclusive communities, increase housing opportunities, and address racial/ethnic and economic disparities in the unincorporated County.

Actions	Objectives and Timeframe
Action 5-1a: Ensure that local housing programs respond to the needs of a culturally diverse community that includes multi-generational families, a variety of living arrangements, and limited English proficiency households. Plans should ensure collaboration with community groups, including faith-based and nonprofit organizations, to provide outreach on housing resources to all types of households and those households with limited English proficiency.	Review policies and procedures for community development and housing assistance programs by December 2026 and make necessary changes within six months.
Action 5-1b: When selecting lending institutions for contracts and participation in local programs, give preference to those with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent	Ongoing, during each funding cycle.

Actions	Objectives and Timeframe
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).	
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.
Action 5-1d: Seek out grant funding to create conceptual land use plans for the re-development of existing communities.	Seek funding annually as applicable Notices of Funding Availability (NOFA) become available.
Action 5-1e: Modify the County's program guidelines according to funding regulations, if necessary, to allow the use of eligible State and/or Federal funding to repair failing septic systems.	Modify funding policies by June 2025.
Action 5-1f: Strive to achieve and maintain recognition as a Prohousing jurisdiction during the 6 th Cycle Housing Element planning period.	Apply for Prohousing designation by June 2026.
Action 5-1g: Offer training to County staff on a variety of topics included in the County's Diversity, Equity, and Inclusion (DEI) plan. (Environmental Justice)	Beginning 2025, offer training sessions annually during the planning period.
Action 5-1h: Update the Safety Element to comply with State Environmental Justice requirements and Housing Element Update regulations.	Complete the Safety Element Update by June December 2026 .
Action 5-1i: Advertise existing workforce training classes offered through Stanislaus County Workforce Development to provide economic mobility, who partners with the local employment organizations to connect residents with job opportunities and workforce training program opportunities.	Continue to offer workforce development programs through the Stanislaus County Workforce Development and host an annual job fair.
Action 5-1j: To enhance access in R/ECAP and lower income areas, the County will continue to promote walkability and active transportation in compliance with the goals outlined in the Circulation Element.	On an on-going basis Public Works will continue to apply for grant funding, such as Active Transportation Program (ATP) funding, to improve multi-modal infrastructure, including sidewalks, in low resource areas of the County. Collaborate with StanRTA to expand and improve transit routes that connect low-income neighborhoods with employment centers, schools, and other essential services.
Action 5-1k: Support economic development efforts to promote housing mobility through consultation with local economic-focused organizations.	Meet annually with Workforce Development, Opportunity Stanislaus, Chambers of Commerce, and industry groups to engage local employers to identify entry-level positions with good pay that can be advertised to lower-income tenants.
Action 5-1l: Continue to develop the Crows Landing Industrial Business Park to create living wage jobs where people live.	Continue to implement the Crows Landing Business Park Specific Plan. Complete infrastructure improvements included in Phase 1A by the end of the planning period.
Implements the Following Policies	5A, 5B
Responsible Agency	County Planning & Community Development Community Services Agency Chief Executive Office County Behavioral health and Recovery Services

Actions	Objectives and Timeframe
Funding Sources	Federal and State Funding Department Revenues

Program 5-2 Fair Housing Services

The County contracts annually with a fair housing and tenant/landlord services provider as part of its CDBG program. The primary objective of the program is to build awareness of housing laws, tenants' rights, and prevent evictions.

Actions	Objective and Timeframe
Action 5-2a: Coordinate with qualified organizations to provide fair housing and tenant/landlord services, including housing counseling and education and tenant/landlord counseling and mediation. Provide written information and workshops in multiple languages. Ensure outreach to identified Disadvantaged Communities, specifically Cowan Tract, Crows Landing, Grayson, Keyes, Monterey Park Tract, Riverdale Park Tract, and Westley ¹ . (Environmental Justice)	Maintain fair housing provider contract and aim to provide at least 90 percent of services in Disadvantaged Communities.
Action 5-2b: Through a fair housing provider, provide information and referral services that direct families and individuals to financial resources for housing rental or purchase, locating suitable housing, and obtaining housing with special needs facilities such as accessible units.	Hold at least eight informational events during the planning period to disseminate informational materials or provide trainings to residents, at least once every two years in communities sensitive to displacement (see Chapter 3, Affirmatively Furthering Fair Housing, Section 3.7.3).
Action 5-2c: Provide training opportunities for property owners and managers about the requirements of federal, state, and local laws related to real estate, housing discrimination, tenant protection, and housing inspection. Work cooperatively with the real estate industry to develop ways for agents and property managers to become more familiar with County housing and rental assistance programs. Encourage realtors to seek fair housing training.	Partnering with a fair housing provider, hold two training sessions annually.
Action 5-2d: Require contracted fair housing provider to conduct random fair housing testing at least annually.	Annual testing.
Action 5-2e: Disseminate fair housing information via targeted social media efforts.	Add more information about fair housing agencies and services on the County's webpage and social media by January 2024 December 2025 .
Implements the Following Policies	5A, 5B, 5C, 5C
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State funding

Program 5-3 Displacement Prevention

Actions	Objective and Timeframe
Action 5-3a: Partner with fair housing organizations to ensure dissemination about the California Tenant Protection Act of 2019 (AB 1482). Develop print and online educational materials and make	Make materials available at County facilities and on the County's website by December June

¹ Stanislaus County Disadvantaged Unincorporated Communities Report. <https://www.stancounty.com/planning/pl/documents/gp/i-d-stanislaus-county-disadvantaged-unin-communities-report.pdf>

Actions	Objective and Timeframe
materials available at County facilities and on the County's website including social media.	2025.
Action 5-3b: Explore opportunities to expand funding to increase capacity of fair housing providers to expand tenant mediation services.	If funding sources are identified and determined feasible, work with fair housing providers to actively seek new funding or reallocate existing funding for expanded services by June 2026.
Implements the Following Policies	5A, 5B, 5C, 5E
Responsible Agency	County Planning & Community Development
Funding Sources	Federal and State funding

6.1 Summary of Quantified Objectives

The County's quantified objectives for the 2023-2031 planning period are as follows:

- Sites to facilitate new housing units, including the County's RHNA of 287 extremely low-income units, 287 very low-income units, 398 low-income units, 458 moderate-income units, and 1,045 above moderate-income units
- New development of 100 lower-income units, 100 moderate-income units, and 100 above moderate units. This would exceed the County's 5th Cycle development trends.
- **Infill development of 84 lower-income units, 83 moderate-income units, and 83 above moderate-income units. This would exceed the County's current 6th Cycle development trends.**
- Rehabilitation of 24 affordable units
- Construction of 184 ADUs
- There are currently no at-risk housing units in unincorporated Stanislaus County

Table 6-1 summarizes these objectives for the 2023-2031 planning period by income category.

Table 6-1 Quantified Housing Objectives (2023-2031)

	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
RHNA	287	287	398	458	1,045	2,475
New Development	33	33	34	100	200	400
Infill Development	28	28	28	83	83	250
Units To Be Rehabilitated	8	8	8	0	0	24
ADUs	0	0	0	0	184	184
At-Risk Housing Units to be Preserved	0	0	0	0	0	0
Units to be Conserved	0	3	109	4	0	116

Note: Government Code Section 65583 mandates that localities calculate the subset of the very-low income regional need that constitutes the communities need for extremely low-income housing. As an alternative to calculating the subset, local jurisdictions may assume that 50 percent of the very low-income category is represented by households of extremely low income (less than 30 percent of the median family income).

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