



City of Turlock



2023-31

Housing Element

PUBLIC REVIEW DRAFT

September 30, 2024





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I Introduction

Purpose and Objectives

All California cities and counties are required to have a Housing Element included in their General Plan which establishes housing objectives, policies, and programs in response to community housing conditions and needs. This Housing Element has been prepared to respond to current and near-term future housing needs in the City of Turlock and provide a framework for the community's longer-term approach to addressing its housing needs.

The Housing Element contains goals, updated information, and strategic directions (policies and implementing actions) that the City is committed to undertaking. Housing affordability in Stanislaus County and in California is a critical issue. Over the past 30 years, housing costs have ballooned, driven by rising construction costs and land values, and homeownership in Turlock and throughout Stanislaus County has become a distant dream for many people. The typical home value in Turlock in January 2024 was more than \$476,000, an increase of 100 percent over the past decade. The double-edged sword of steep home prices is apparent as subsequent generations are priced out of the local housing market. Similarly, high housing costs have become a significant obstacle to hiring teachers, first responders, and others essential to the community.

This Housing Element touches many aspects of community life. It builds upon the goals, policies, and implementing programs contained in the City's 2015-2023 Housing Element and other City policies and practices to address housing needs in the community. The overall focus of the Housing Element is to preserve and enhance community life, character, and serenity through the provision of adequate housing opportunities for people at all income levels, while being sensitive to the small-town character of Turlock that residents know and love.

The following are some of the specific purposes of the Housing Element update:

1. **Address Regional Housing Needs Allocation (RHNA).** Ensure capacity for the development of new housing to meet the RHNA of 5,802 housing units at all income levels for the 2023-2031 planning period.
2. **Provide a Variety of Housing Opportunities.** Provide a variety of housing opportunities proportionally by income to accommodate the needs of people who currently live, work, and go to school in Turlock, such as older adults, large families, students, teachers, and first responders.
3. **Provide Equal Housing Opportunities.** Provide for fair and equal housing opportunities for all persons, regardless of protected characteristics, including but not limited to, age, ancestry, sex, gender, gender expression, sexual orientation, religion, disability, family status, race, creed, color, or national origin.

4. **Address Affordable Housing Needs.** Continue existing and develop new programs and policies to meet the projected affordable housing need of extremely low, very low, low, and moderate-income households.
5. **Address the Housing Needs of Special Need Groups.** Continue existing and develop new programs and policies to meet the projected housing needs of persons living with disabilities, unhoused people, older adults, female-headed households, students, and other special needs households in the community.
6. **Remove Potential Constraints to Housing.** Evaluate potential constraints to housing development and encourage new housing in locations supported by existing or planned infrastructure, while maintaining existing neighborhood character. Develop programs to help remove or reduce barriers to the development of housing for all income levels.
7. **Maintain Existing Housing.** Maintain the existing housing stock to assure high quality maintenance, safety, and habitability of existing housing resources.
8. **Provide Adequate Housing Sites.** Identify appropriate housing sites within specified areas that have the potential to accommodate or are proximate to transportation, shopping and schools, and the accompanying zoning required to accommodate housing development.
9. **Promote Energy Efficiency.** Continue to promote energy efficiency in residential development to lower energy use through energy-efficient urban design and through better design and construction in individual projects.

Legal Requirements

State law requires each city, town, and county in California to adopt a General Plan containing at least seven elements, including a Housing Element. Regulations regarding Housing Elements are found in the California Government Code sections 65580-65589. Although the Housing Element must follow State law, it is by its nature a local document. The focus of the Turlock Housing Element is on the needs and preferences of Turlock residents and workers as they relate to housing in the community. Within these parameters, the intent of the Element is also to comply with State law requirements.

Unlike the other mandatory General Plan elements, the Housing Element requires periodic updating and is subject to detailed statutory requirements and mandatory review by the State of California Department of Housing and Community Development — HCD. According to State law, the Housing Element must:

- Provide goals, policies, quantified objectives, and scheduled programs to preserve, improve and develop housing.
- Identify and analyze existing and projected housing needs for all economic segments of the community.
- Identify adequate sites that will be zoned and available within the Housing Element planning period — between 2023 and 2031 — to meet the City’s share of regional housing needs at all income levels.
- Be submitted to HCD to review and certify that the Housing Element complies with State law.

State law establishes detailed content requirements for Housing Elements and establishes a regional “fair share” approach to distributing housing needs throughout all communities in the Stanislaus Council of Governments (StanCOG) region. The law recognizes that for the private sector and non-profit housing sponsors to address housing needs and demand, local governments must adopt land use plans and

implementing regulations that provide opportunities for, and do not unduly constrain, housing development.

REGIONAL HOUSING NEEDS ALLOCATION (RHNA)

Turlock’s Housing Element was last updated in 2015 to plan for the years 2015-2023. This Housing Element update reflects the RHNA as determined by StanCOG for the Sixth Cycle Housing Element update, covering the years 2023-2031. The RHNA is a State-mandated process intended to ensure every city, town, and county plans for enough housing production to accommodate future growth. HCD assigns each region of the state an overall RHNA allocation. StanCOG distributes a “fair share” portion of that allocation to each local jurisdiction in Stanislaus County. Each city and county must then identify adequate sites with a realistic capacity for development sufficient to meet this RHNA.

For the 2023-2031 period, Turlock must identify sites sufficient to accommodate 5,802 new housing units between 2023 and 2031, with a specific number of units designated as affordable to each income category, as shown in Table 1-1. The RHNA does not specifically break down the need for extremely-low-income households. As provided by State law, the housing needs of extremely-low-income households, or those making less than 30 percent of area median income (AMI), is estimated as 50 percent of the very-low-income housing need. More detail on the RHNA allocation process is described in Chapter 3 as well as in Appendix C.

Table 1-1: Turlock Regional Housing Needs Assessment, 2023-2031

| <i>Income Level</i> | <i>AMI</i> | <i>Needed Units</i> | <i>Percent of Needed Units</i> |
|-----------------------|------------|---------------------|--------------------------------|
| Very-Low-Income | 0-50% | 1,305 | 22.5% |
| Low-Income | 51-80% | 903 | 15.6% |
| Moderate-Income | 81-120% | 1,096 | 18.9% |
| Above-Moderate-Income | >120% | 2,498 | 43.0% |
| Total | | 5,802 | 100.0% |

Source: HCD State Income Limits, 2024; City of Turlock, 2024; Dyett & Bhatia, 2024

HOUSING ELEMENT LAW: STATE CHANGES

Various amendments have been made to Housing Element law since adoption of the 2015-23 Housing Element, especially since 2017. Some of the key changes for 6th cycle RHNA and Housing Element update include:

- Assembly Bill (AB) 72 (2017), codified in Government Code section 65585, provides additional authority to State HCD to scrutinize housing elements and enforce housing element noncompliance and other violations of state housing laws.
- AB 879 (2017), which amended Government Code sections 65400, 65583, and 65700 and Health and Safety Code section 50456, and AB 1397 (2017), which amended Government Code sections 65580, 65583, and 65583.2, require additional analysis and justification of sites listed on a local government’s housing sites inventory, additional explanation of the realistic capacity of those listed sites, and further scrutiny of governmental and nongovernmental constraints that limit the production of housing.
- AB 686 (2018), which amended Government Code sections 65583 and 65583.2, requires local governments to Affirmatively Further Fair Housing (AFFH) by including in revised housing

elements (1) an assessment of fair housing; (2) equitable distribution of housing to meet the needs of households at all income levels and dismantle segregated living patterns with integrated and balanced living patterns; (3) policies and programs that address fair housing barriers and promote fair housing patterns; and (4) a comprehensive, collaborative, accessible, inclusive, and equity-driven public engagement approach.

- AB 215 (2021), which amended Government Code section 65585, extends the housing element compliance review process by requiring local governments to make draft housing elements available for public review prior to submittal to State HCD rather than conducting concurrent review. The draft must be made publicly available for at least 30 days, and the local government must consider and incorporate public comment for at least 10 business days, before sending the draft to State HCD. AB 215 also increased State HCD’s review period of the first draft element submittal from 60 to 90 days and within 60 days of its receipt for a subsequent draft amendment or adoption. However, the January 31, 2023, statutory deadline remains the same, even as these new requirements have significantly added to the time a city needs to complete the overall housing element update process.
- AB 1398 (2021), which amended Government Code sections 65583, 65583.2, and 65588, revises the consequences for local governments that do not meet the deadline for housing element adoption. Local governments must complete rezoning no later than one year from the statutory deadline for adoption of the housing element if that jurisdiction fails to adopt a housing element that State HCD has found to be in substantial compliance with state law within 120 days of the statutory deadline. The City retains the three-year rezoning period if the housing element is adopted within 120 days of the statutory deadline.
- AB 1304 (2021), which amended Government Code sections 8899.50, 65583, and 65583.2, clarifies that a public agency has a mandatory duty to comply with existing Housing Element Affirmatively Furthering Fair Housing (AFFH) requirements. AB 1304 revises the items to be included in AFFH analysis and requires that analysis to be done in a specified manner. In addition, the housing inventory must analyze the relationship of the sites identified in the inventory to the city’s duty to affirmatively further fair housing.

The contents of this Housing Element comply with these amendments and all other requirements of Housing Element law.

Community Involvement

Community involvement is an integral component of the Housing Element process. The City of Turlock employed a range of public outreach and engagement strategies to solicit meaningful community input that has informed the Draft 2023-2031 Housing Element. These strategies included a citywide survey that garnered over 1,500 responses, pop-up outreach at popular locations around town, web and social media engagement, and public meetings before the Planning Commission and City Council, as well as ongoing communication with the community online at the project’s website. Details of outreach activities and community input are included in Appendix G. A summary of these engagement activities is described below, together with a summary of how feedback is reflected in the Housing Element:

- **Web and Social Media** – At the outset of the process, a webpage was created on the City’s website to serve as a one-stop information portal for the Housing Element Update. The webpage provided contextual information on legal requirements and key concepts and housed draft

documents for public review. Updated content was posted to the City website and on social media regularly to keep the community informed of progress.

- **Pop-Up Outreach** - Using a “go to them” strategy to raise awareness of the project and provide community members with additional in-person opportunities for input, City staff conducted pop-up events in 2023 at locations where community members gather, such as National Night Out event held at Columbia Park. Events were structured as "chalk board chats" that provided community members with opportunities to learn about the project and share quick feedback on what strategies the Draft Housing Element and Environmental Justice Element should prioritize.
- **Focus Group Discussions** - To gain insight into issues and opportunities related to housing production and supportive services, a series of focus group discussions was conducted with subject matter experts, including affordable housing developers, market rate developers, and architects with experience in Turlock and Stanislaus County; and service providers catering to the needs of older adults, low income residents, the homeless and other special needs groups. Input received informed development of programs in the Housing Action Plan.
- **Citywide Survey** – In order to gather community input to inform updates to the Housing Element, a survey was mailed to every household in Turlock. The survey was conducted February 1, 2024, to March 1, 2024, and provided residents with an opportunity to help identify and evaluate strategies for accommodating and encouraging new housing to serve local needs to help the City meet the legal requirements for the Housing Element. In total, more than 1,500 respondents participated in the survey. The results of the survey informed the selection of sites and key strategies for accommodating RHNA.
- **Public Review Period** - The Draft Housing Element has been released for a 30-day public review period starting in September 2024.
- **Decision-Maker Meetings** – A series of study sessions before the Planning Commission and City Council was held as the components of the Housing Element were developed and refined, providing additional opportunities for public input and decision-maker review. A joint Planning Commission and City Council study session was held in June 2023 to provide an overview of the legal requirements for the Housing Element and solicit feedback on project priorities. The Planning Commission held a study session on the preliminary sites inventory and key strategies for the Housing Element in July 2024, and feedback was used to refine the sites analysis and specific strategies for accommodating RHNA and furthering fair housing in Turlock. Upon close of the 30-day public review period, the Draft Housing Element and public comments will be presented to the Planning Commission and City Council. Adoption hearings before the Planning Commission and City Council are planned for early 2025.

Organization of the Housing Element

The Housing Element is a required component of the General Plan, published under separate cover. It is an eight-year plan that is updated more frequently than other General Plan elements to ensure its relevancy and accuracy. This Housing Element consists of the following major components organized as described below:

- **Chapter 1 - Introduction:** Provides an introduction to the purpose of the document and the legal requirements for a Housing Element, together with an overview of the community and the community involvement process.

- **Chapter 2 – Community Profile:** Documents population characteristics, housing characteristics, and current development trends in Turlock and to characterize local conditions, needs, and challenges.
- **Chapter 3 – Housing Resources:** Presents an overview of land suitable and available for construction of new housing to meet needs at all economic levels along with projections of their realistic capacity for housing on available sites during the planning period and an overview of administrative and financial resources to support housing planning and production.
- **Chapter 4 - Housing Action Plan:** Articulates housing goals, policies, and programs to address the City’s identified housing needs, including those of special needs groups and the findings of an analysis of fair housing issues in the community.
- **Appendix A – Sites Inventory:** Presents a parcel-by-parcel inventory of sites identified to accommodate the City's RHNA together with other pertinent details in the electronic inventory form provided by the State for use in Housing Elements.
- **Appendix B – Housing Needs Assessment:** Presents a profile of the community, including demographic and economic characteristics, commute patterns, and environmental conditions in the city.
- **Appendix C – Constraints Analysis:** Includes an analysis of constraints to housing production and maintenance in Turlock. Constraints include market-based factors, regulatory and process constraints, and environmental considerations that may affect housing production.
- **Appendix D – Fair Housing Assessment:** A detailed analysis of fair housing conditions in Turlock, including an assessment of the City’s fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities based on available federal, State, and local data; an assessment of contributing factors; an identification of fair housing goals based on the analysis; and a series of actions to achieve the goals.
- **Appendix E – Fifth Cycle Accomplishments:** Summarizes the City’s achievements in implementing goals, policies, and actions under the previous Housing Element as well as an assessment of which programs to carry forward, modify or discontinue based on an evaluation of past performance.
- **Appendix F – Additional Analysis and Information in Support of Housing Projections:** Includes additional details to demonstrate the viability of sites included on the inventory of housing sites and the projections for housing development during the 2023-31 period.
- **Appendix G – Outreach Materials:** Includes outreach materials, summaries, and a description of how community and stakeholder input has been reflected in the Housing Element.

General Plan Consistency

State law requires that the General Plan and all of its elements comprise an integrated, internally consistent, and compatible statement of policies. The City of Turlock General Plan was adopted in September 2012, and the Housing Element, published under separate cover, was certified and adopted in 2015. The Sixth Cycle Housing Element Update is consistent with the General Plan and will further several of its key objectives related to downtown development, housing affordability, and infill and transit-oriented development. Specifically, by promoting housing and mixed use development downtown, the Housing Element is consistent with General Plan Policy 2.4-a, which seeks to encourage development of downtown as a mixed-use, day and evening activity center with new residential development in and near downtown,

and with Policy 2.4-g, which aims to facilitate and incentivize development of residential and mixed-use projects through the development review, permitting, and fee processing. The inclusion in the Housing Element of strategies to foster a range of housing types in Turlock neighborhoods is consistent with General Plan Policy 2.5-a, which seeks to increase the diversity in the citywide mix of housing types by encouraging development of housing at a broad range of densities and prices, including small-lot single-family, townhouses, apartments, and condominiums. By emphasizing infill development, the Housing Element is consistent with General Plan Policy 2.9-c, which seeks to relieve pressures to convert valuable agricultural lands to urban uses by encouraging infill development, and by focusing new higher density housing downtown and along corridors served by transit in Turlock, the Housing Element is consistent with General Plan policies 2.5-g and 2.5-h.

State law (Government Code 65302(h)(1) through (4)) requires that California cities and counties identify disadvantaged communities within territory covered by the general plan and adopt an Environmental Justice Element with goals and policies to reduce the unique or compounded health risks in disadvantaged communities, promote civic engagement in the public decision-making process, and prioritize improvements and programs that address the needs of disadvantaged communities. Accordingly, in parallel with the Sixth Cycle Housing Element Update, the City has initiated the creation of the Environmental Justice Element to ensure compliance with State law.

Residents of neighborhoods in the southwest of Turlock experience higher rates of poverty, housing cost burden and overcrowding. Residents of these areas also experience higher rates of asthma and cardiovascular disease than other areas of the city and are more exposed to traffic and diesel particulate matter from trucks. The rate of households without health insurance is slightly higher in these neighborhoods than in other parts of the city, and tree canopy coverage is lower. With the projected increase in average summertime temperatures and the number of extreme heat days in coming decades, air quality and related health conditions will likely be exacerbated. The Environmental Justice Element and programs in the Housing Action Plan address the specific issues at play in Turlock's DACs, ensuring consistency between these elements of the General Plan.

In 2022, the City participated in a comprehensive update of the 2017 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan. As part of the process, the City of Turlock prepared and adopted a Local hazard Mitigation Plan (LHMP), which implements the Federal Emergency Management Agency's (FEMA) Mitigation Planning regulations (44 CFR 201), the federal Disaster Mitigation Act of 2000, and the Floodplain Management Plan requirements of FEMA's Community Rating System (CRS). The City is required to have a FEMA-approved hazard mitigation plan to be eligible for disaster recovery assistance and mitigation funding. The LHMP was found in compliance with the Disaster Management Act and approved by the California Office of Emergency Services (CAL-OES) and FEMA, and the Safety Element was amended to incorporate the LHMP by reference. The identification of sites to accommodate the City's Sixth Cycle RHNA was made in consideration of natural and humanmade hazards in the community, ensuring consistency with the Safety Element.

Overall, this Sixth Cycle Housing Element builds upon the City's current, adopted General Plan and is consistent with its goals, policies, and implementation actions. Through implementation of programs in the Action Plan of this Housing Element, the City will continue to review the General Plan and Housing Element annually for internal consistency as amendments are proposed and adopted.

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2 Community Profile

Turlock is a Stanislaus County community of about 71,000 residents with strong agricultural roots and relaxed rural feel. The city occupies 16.9 square miles of land within the California State Route 99 corridor, linking it to other Central Valley cities including Stockton and Sacramento to the north and Fresno and Bakersfield to the south. As the home of the California State University, Stanislaus, Turlock offers an opportunity to combine a quality learning environment with small-town feel. Cultural art experiences, sports activities, twenty-four parks, sixteen schools, a full range of medical facilities and the attractiveness of the nearby San Francisco Bay Area and the Sierra Nevada add to the pleasure of living in Turlock.

This community profile documents population and housing characteristics, economic conditions, and current development trends to highlight community housing needs as well as issues and opportunities related to housing production. For a more detailed analysis of local housing needs, please see Appendix B: Housing Needs Assessment.

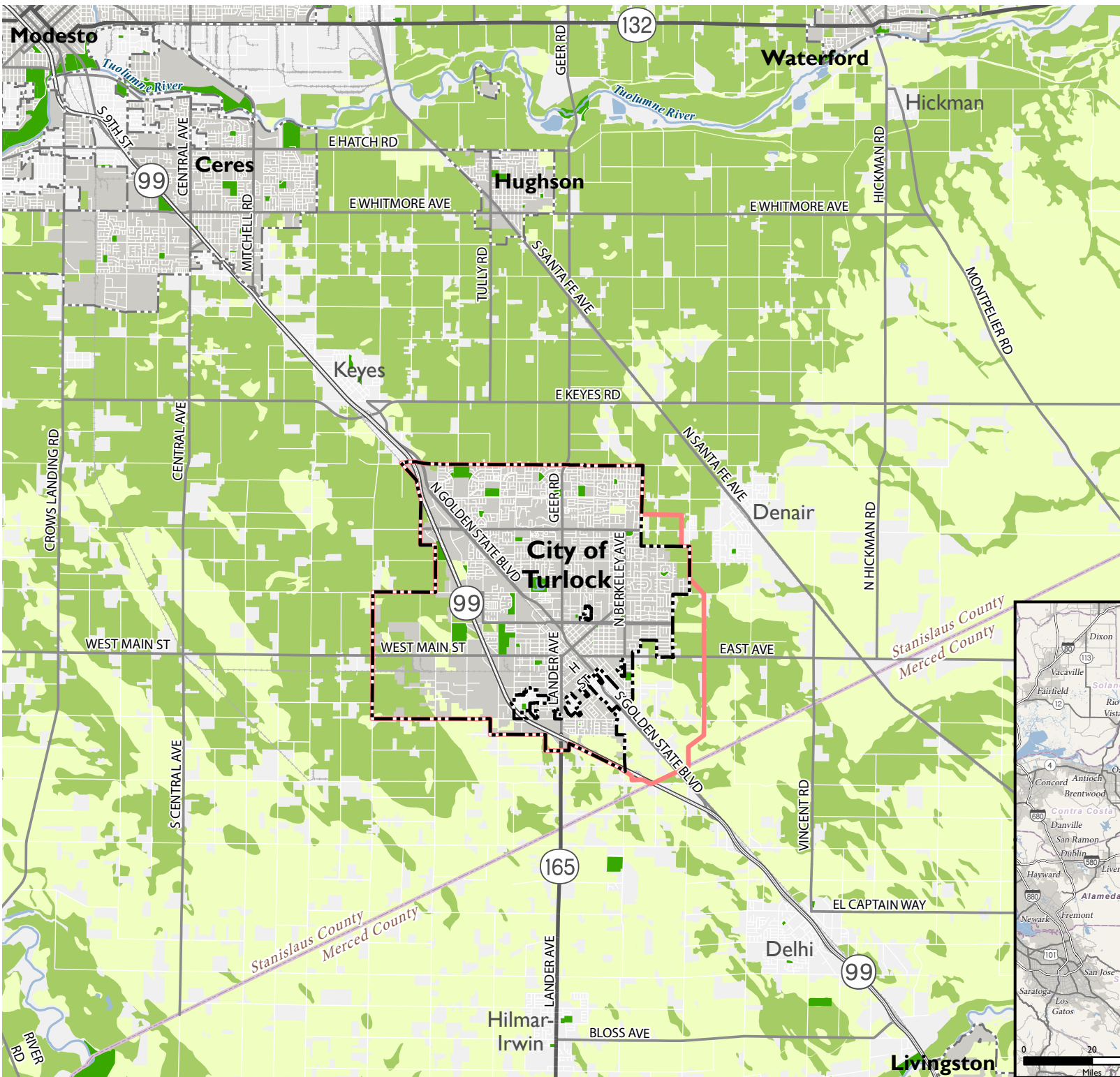
Location and Context

LOCATION AND ACCESS

The City of Turlock is located in southern Stanislaus County about 14 miles south of Modesto, 26 miles north of Merced, and 45 miles south of Stockton, as shown in Map 2-1. Covering an area of approximately 16.9 square miles, the City is an urbanized island, surrounded on three sides by prime agricultural lands in each direction. Highway access is provided by California State Route 99 (SR 99), a north-south highway that runs through the center of Turlock. Stanislaus Regional Transit Authority (StanRTA) provides connections from the Roger K. Fall Transit Center on North Golden State Boulevard to the surrounding cities, such as Keyes, Ceres, and Modesto. Amtrak operates the San Joaquin route from the Turlock-Denair station on North Santa Fe Avenue in Denair, providing multiple daily connections between San Francisco Bay Area and Bakersfield. Within the city, Turlock Transit is the primary bus agency serving residents and visitors of Turlock and provides seven different individual routes to navigate around Turlock, as shown in Map 2-2.

EXISTING LAND USE PATTERN AND USES

Turlock is the second most populous jurisdiction in Stanislaus County, behind Modesto. The city is mostly developed with single-family homes, multi-family apartments, school and educational facilities, industrial facilities, parks and open space, as well as agriculture uses. The single largest land use category in Turlock is public/semi-public at nearly 3,500 acres, which encompasses all publicly owned facilities and private facilities operated to serve the general public. Included in this category are public schools, hospitals, utilities, and cemetery. Single-family residential accounts for about 3,300 acres of land use in the City, while multi-family residential cover about 470 acres. Industrial uses occupy 1,100 acres, agriculture uses occupy 900 acres, commercial and mixed use occupy 670 acres, while parks and recreation occupy 230 acres. Respective percentages for each land use category are depicted in Chart 2-1 below.



Map 2-1
**Housing Element
 Regional and Local Context**

- Prime Farmland
- Other Farmland*
- Parks and Recreation

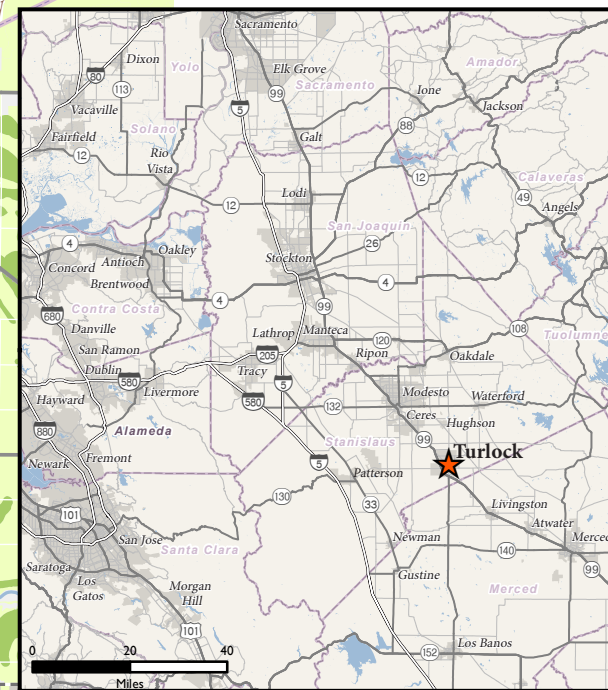
* Other Farmland include Farmland of Statewide Importance, Unique Farmland, and Grazing Land



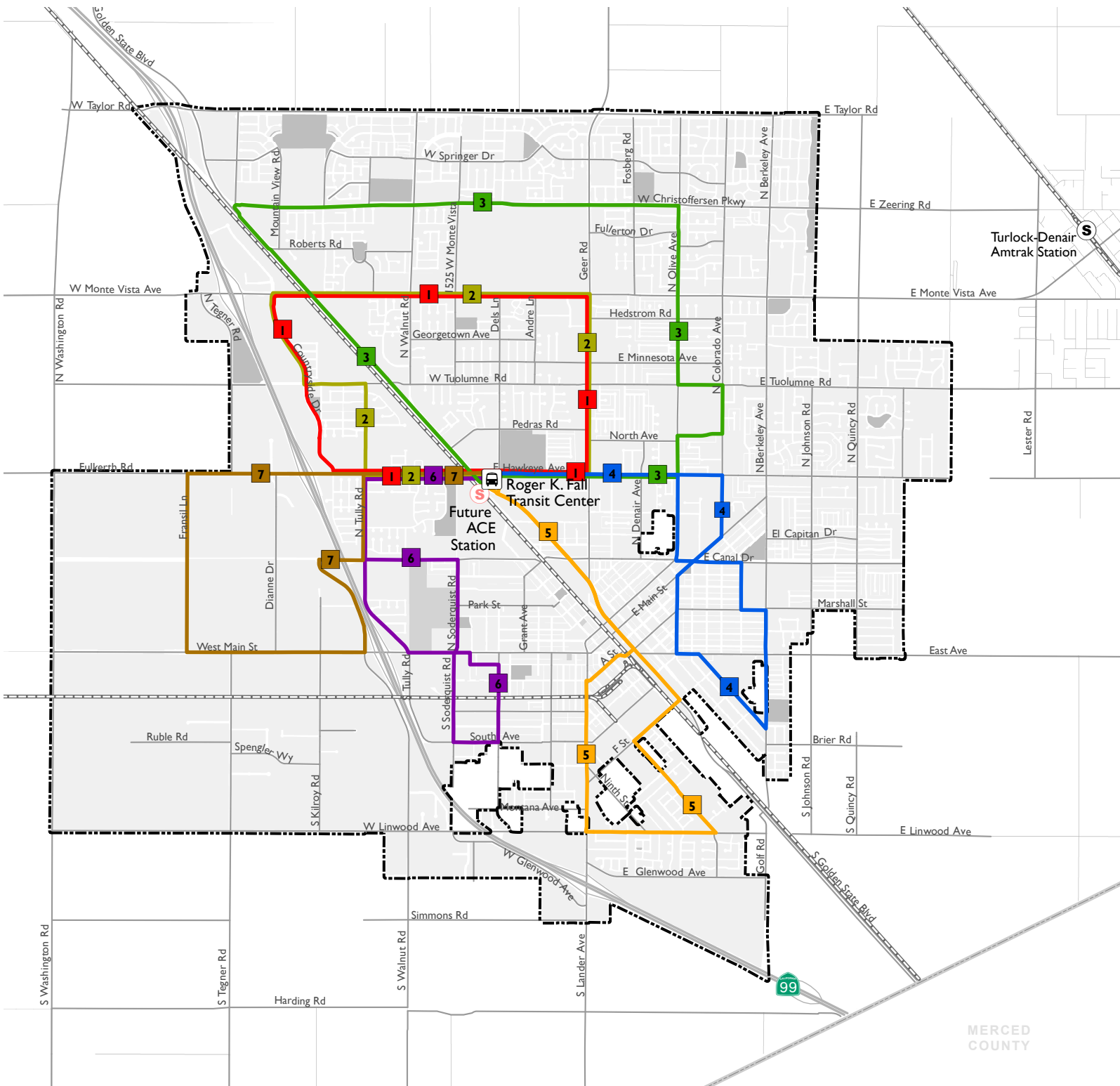
Map Date:
8/15/2024

Source: Farmland Mapping and Monitoring Program, Department of Conservation, 2020; City of Turlock, 2021; Dyett & Bhatia, 2021

Regional Locator



Map 2-2
 Housing Element
 Transit Routes in Turlock



- Route**
- Route 1: Countryside
 - Route 2: Geer
 - Route 3: Olive
 - Route 4: Colorado
 - Route 5: Lander
 - Route 6: Soderquist
 - Route 7: Fransil

- Parks
- Cemetery/Mortuary
- City Limit
- County
- Freeway
- Major Road
- Road
- Railroad

MERCED COUNTY

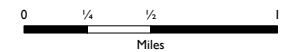
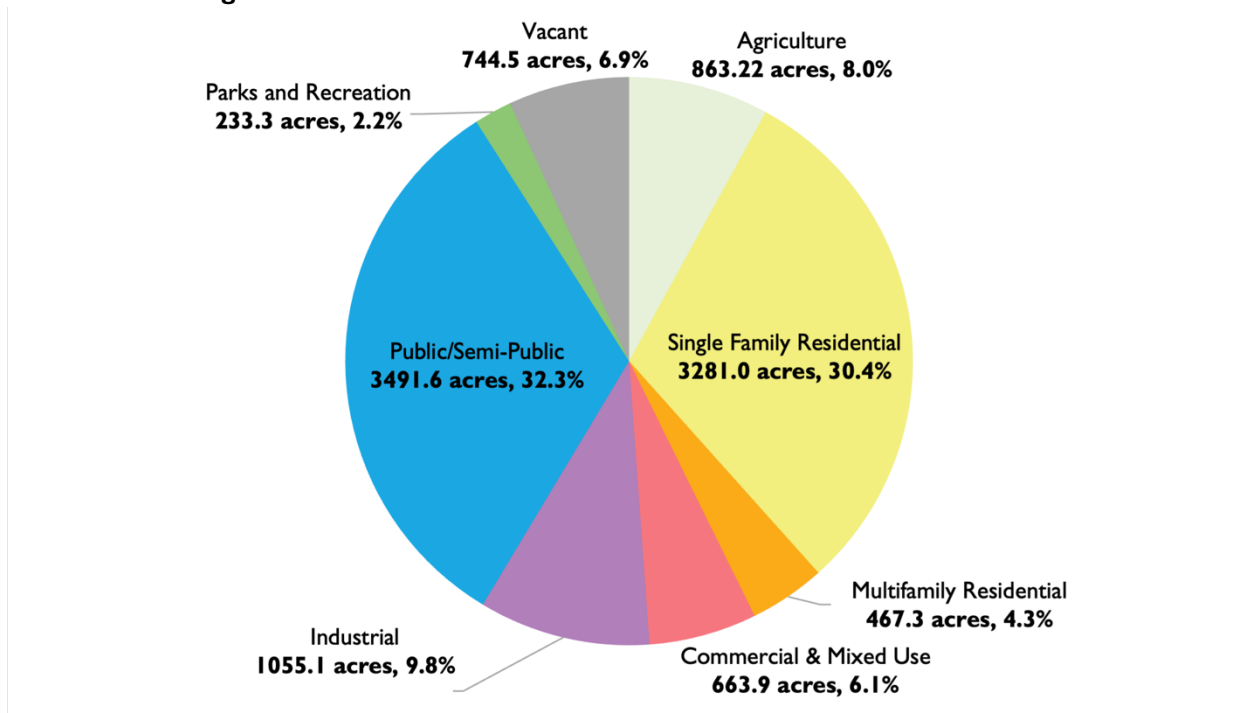


Chart 2-1: Existing Land Use



AGRICULTURAL RESOURCES AND ENVIRONMENTAL CONDITIONS

Turlock’s natural setting and agricultural heritage are an important part of the city. Much of the land encircling the urbanized area of Turlock is categorized as Prime Farmland by the State of California, a designation that means the land has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and crops. Other Farmland that includes Farmland of Statewide Importance, Unique Farmland, and Grazing Land, as displayed on Map 2-2. While Turlock’s economic base has expanded substantially beyond farming, the city remains a community physically and socially characterized by its agricultural past and current farming activity. Many of Turlock’s major industries are food processors, thus directly tied to agriculture, further discussed below. The City has maintained policies that preserve the belt of agricultural land around the City limits, maintaining Turlock as a stand-alone community within an agricultural region. As such, careful consideration of farmland was vital in selecting and allocating adequate sites for all income categories in Turlock’s inventory.

Population Characteristics

POPULATION TRENDS

According to the California Department of Finance (DOF), the total population of the City of Turlock in 2024 was 71,273, an increase of 4.0 percent since 2010 (68,549). As shown in Table 2-1, Stanislaus Council of Governments (StanCOG) projects that by 2040 the population of Turlock will increase approximately 30 percent from the 2010 reported Census population and the 2050 population is projected to increase by approximately 41 percent from the 2010 reported Census population.

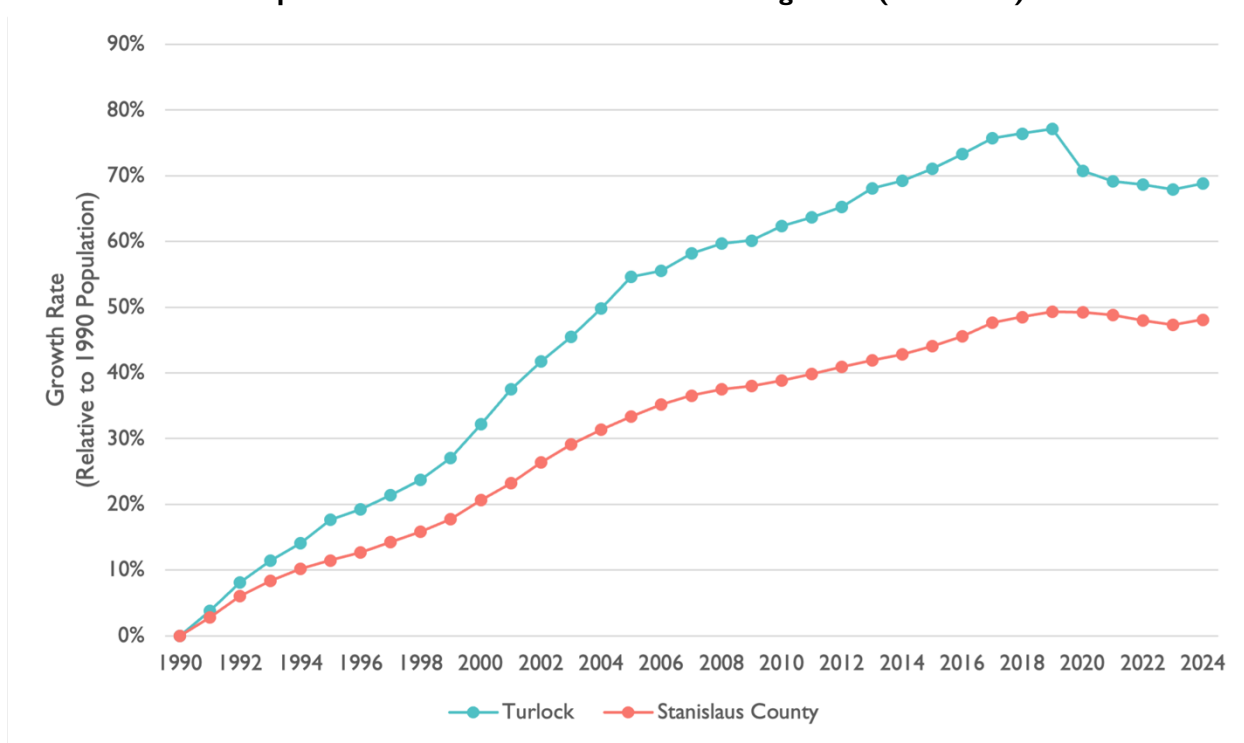
Table 2-1: City of Turlock Population Projections (2010-2050)

| 2010 | 2015 | 2020 | 2025 | 2030 | 2035 | 2040 | 2045 | 2050 |
|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| 68,549 | 72,247 | 75,030 | 80,342 | 83,293 | 85,935 | 89,159 | 92,803 | 96,641 |

Source: Stanislaus County Demographic & Employment Forecast 2021, California Department of Finance, E-5 series

The DOF has also provided population estimates for the years 1994 to 2024 in Turlock and Stanislaus County. Shown in Chart 2-1, these data points represent the population growth in each of the geographies relative to their populations in 1990. As evidenced in the plot, Turlock has seen a higher relative growth rate than Stanislaus County during the 1990 to 2020 period. However, since 2020 growth in Turlock has declined slightly more than growth in Stanislaus County. Between 2023 and 2024, there was a slight increase in population growth in both Turlock and the County.

Chart 2-1: Historic Population Growth Turlock and Surrounding Areas (1990-2024)

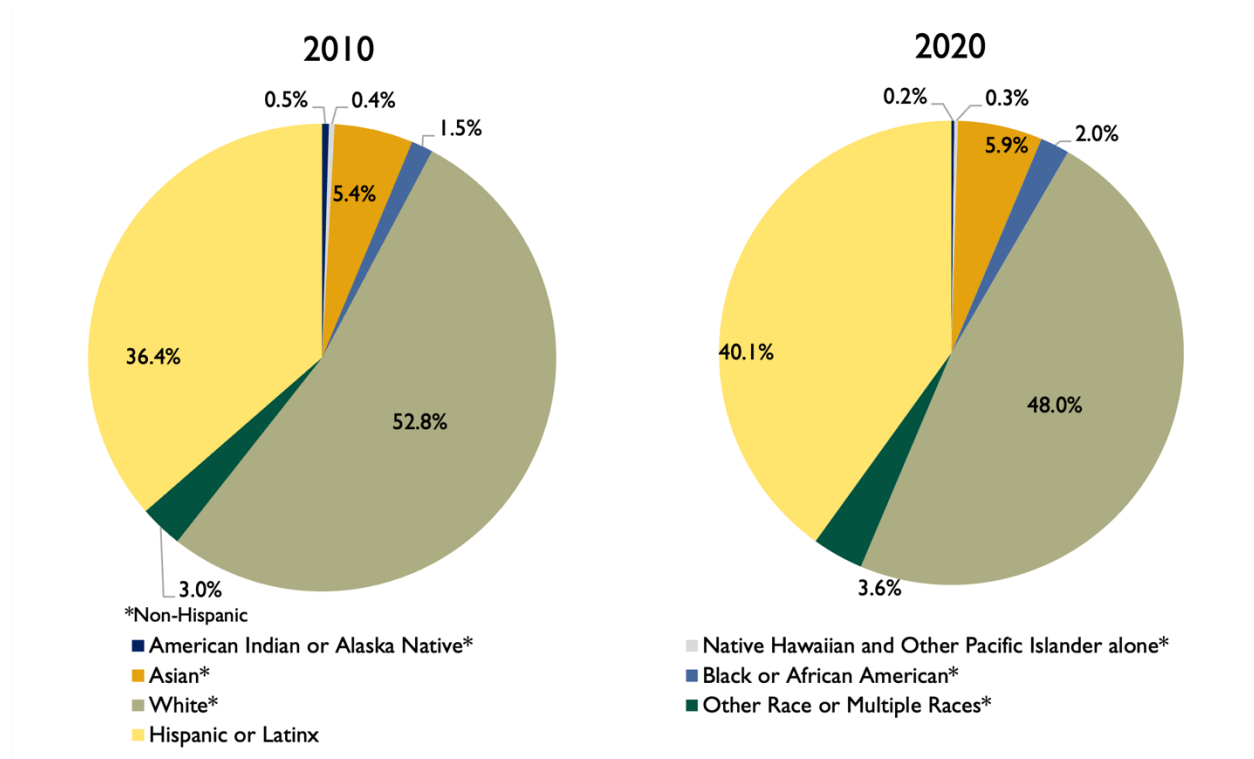


Source: California Department of Finance, E-5 Series

RACE AND ETHNICITY

Chart 2-2 presents the racial and ethnic composition of the City of Turlock’s population in 2010 and 2020 as reported in the U.S. Census (for 2010) and in American Community Survey five-year data (for 2020). Since 2010, Turlock has seen an increase in its Hispanic population from 36.4 percent to 40.1 percent, which remains the city’s second largest single racial or ethnic group, aside from non-Hispanic White. During the same period, the non-Hispanic White population has decreased both in total numbers and share of the city’s overall population, while the non-Hispanic Asian and non-Hispanic Black or African American populations have increased slightly. Between 2020 and 2022, the trend continued and the non-Hispanic White population decreased to 41.2 percent of the population in 2022, while the Hispanic or Latinx population increased to 44.4 percent.

Chart 2-2: Population by Race in Turlock, 2010 and 2020



AGE

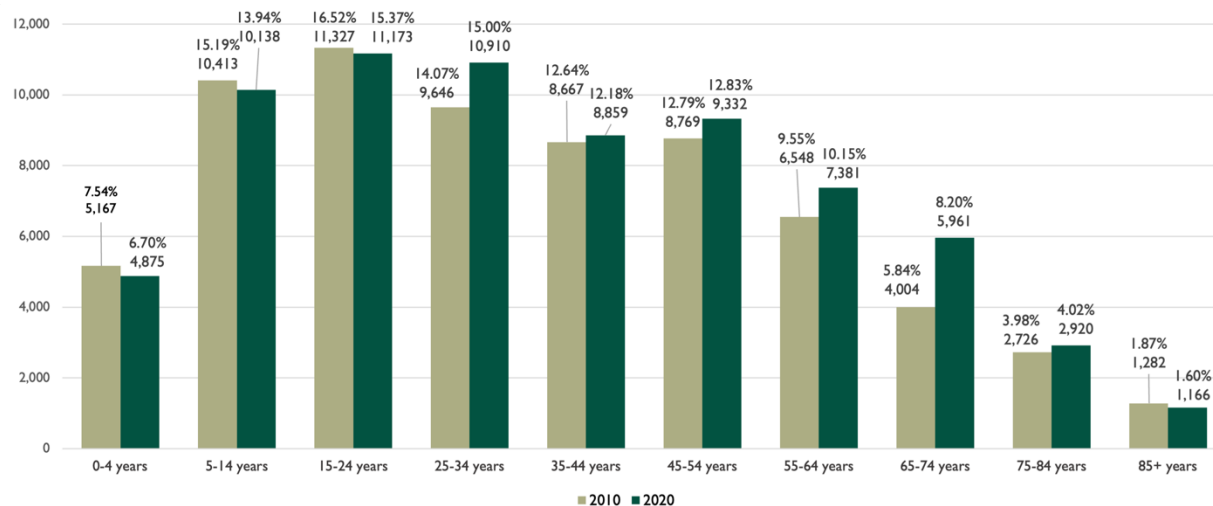
Current and future housing needs are usually determined in part by the age characteristics of a community’s residents. Each age group has distinct lifestyles, family type and size, incomes, and housing preferences. Consequently, evaluating the age characteristics of a community is important in determining its housing needs.

According to the 2020 ACS five-year estimates, the city’s median age is 34.5, which is nearly equal to Stanislaus County’s median age of 34.3. Chart 2-3 indicates that older adults in Turlock account for the fastest growing share of the overall population: 13.8 percent of the population was age 65 and over in 2020 compared to 11.8 percent in 2000, despite a small decrease in the population over 85. Notably, by the end of the 2023-2031 planning period, adults within Turlock’s 55 to 64 cohort (10.15 percent of the 2020 population) will become seniors. In addition, the share of children, youth, and young adults (under 24) has decreased since 2010, from 41.2 percent of the population in 2000 to 36.0 percent of the population in 2020. Between 2020 and 2022, patterns remained relatively similar, with 13.3 percent of the population over 65, 11.2 percent of the population between 55 and 64 and 36.5 percent under 24. These trends suggest a need for greater attention to the diverse housing needs of older populations, including resources for aging in place or senior housing.

GENDER

In 2022, there were 72,307 residents in Turlock; about 46.9 percent of residents were male, while 53.1 percent of residents were female. Female-headed families, including those with children, are identified as a special needs group in State law because they are more likely to be supporting a household with one income, increasing the probability the household is low-income and housing cost-burdened. In Turlock, there are 3,756 female-headed households (15.2 percent of total households) and 1,932 male-headed households (7.8

Chart 2-3: Age Distribution in Turlock, 2010 and 2020



Source: U.S. Census Bureau, Census 2000 SFI, Table P12; U.S. Census Bureau, Census 2010 SFI, Table P12; U.S. Census Bureau, American Community Survey 5-Year Data (2016-2020), Table B01001

percent of total households). Female-headed households represented about 11.4 percent of owner-occupied households and 19.8 percent of renter-occupied households. Similarly, in Stanislaus County as a whole, female-headed households represented about 10 percent of owner-occupied households and 22.3 percent of renter-occupied households. Stanislaus County has a slightly higher percentage of renter-occupied female-headed households than Turlock.

INCOME

Household income is one of the most significant factors affecting housing choice and opportunity. Income largely determines a household’s ability to purchase or rent housing. While higher-income households have more discretionary income to spend on housing, lower- and moderate-income households are limited in the range of housing they can afford. Typically, as household income decreases, cost burdens and overcrowding increase.

For the purpose of evaluating housing affordability, housing need, and eligibility for housing assistance, income levels are defined by guidelines adopted each year by the California State Department of Housing and Community Development (HCD). For Stanislaus County, the applicable Area Median Income (AMI) for a family of four in 2024 is \$92,600. This is an increase of 33 percent from the 2014 median income of \$62,000. The United States Department of Housing and Urban Development (HUD) has defined the following income categories for Stanislaus County, based on the median income for a household of four persons for 2024:

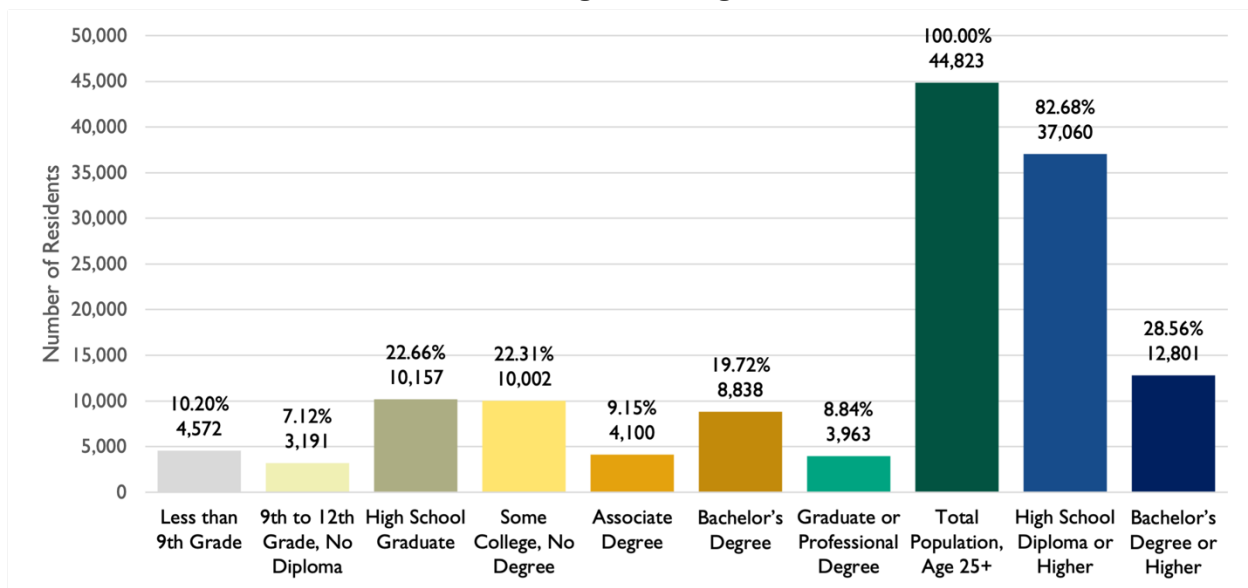
- Extremely low-income: 30 percent of AMI and below (\$0 to \$31,200)
- Very low-income: 31 to 50 percent of AMI (\$31,200 to \$45,500)
- Low-income: 51 to 80 percent of AMI (\$45,500 to \$72,900)
- Moderate-income: 81 to 120 percent of AMI (\$72,900 to \$92,600)
- Above moderate-income: 120 percent or more of AMI (\$92,600 or more)

HUD data for the 2016-2020 period also includes income data. This income data is based on the ACS 2016-2020 estimates, and thus does not align exactly with categories assigned to the 2024 HUD established income levels. Table 2-7 provides this data. Stanislaus County and Turlock have relatively similar distributions of households at each income level. However, Turlock has a slightly greater number of households that made between zero and 30 percent of AMI (13.5 percent) compared to the county (11.1 percent).

EDUCATIONAL ATTAINMENT

As shown in Chart 2-4, the share of the population age 25 and over in Turlock who held a high school diploma or higher was 82.7 percent in 2022. About 28.6 percent of the population in Turlock holds a bachelor’s degree or higher. The share of the population with a bachelor’s degree or higher has grown steadily in Turlock, from 23.6 percent in 2012 to 28.6 percent in 2022.

Chart 2-4: Educational Attainment Among Those Age 25 Years and Over, 2020



Source: US Census Bureau American Community Survey, 2022, Table B15003; Dyett & Bhatia, 2024

SPECIAL NEEDS GROUPS

Certain groups have greater difficulty in finding suitable affordable housing due to their special needs and circumstances. This may be a result of employment and income, family characteristics, disability, or household characteristics. Consequently, certain residents in the City of Turlock may experience more instances of housing cost burdens, overcrowding, or other housing problems. The categories of special needs that must be addressed by law in the Housing Element include:

- **Extremely-Low-Income Households.** While only representing 0.21 percent of the City’s population, American Indian or Alaska Native non-Hispanic residents are most likely to fall below 30 percent AMI and experienced the second highest rates of poverty. They are followed by Black or African American residents who experience the highest rates of poverty. Overall, Turlock has a lower poverty rate (13.1 percent) than the County (15.1 percent).
- **Older Adult Households.** Older adults are the fastest growing segment of the population in Turlock, and 10 percent of the population is aged between 55 and 64 years, which means a relatively large number

of residents will become seniors during the 2023-31 planning period. Approximately one-third of older adults are renters and nearly 33 percent qualify as low income, while nearly 20 percent qualify as very low income. Overall, whether renter or owner, around 50 percent of older adult households in Turlock are considered cost burdened, meaning they spend 30 to 50 percent of their income on housing-related costs.

- **Persons with Disabilities.** In the city, there is almost equivalent proportion of persons with disabilities to the City and the County (12.3 percent and 12.7 percent). Over 90 percent of residents with a developmental disability lived at the home of a parent/family/guardian.
- **Female-headed Households.** Female-headed households make up about 15.2 percent of the total households in Turlock. These households are more likely to rent than to own. Nearly 30 percent of all female-headed households with children in Turlock live below the federal poverty level. The special needs of these households should be addressed in the Housing Element Update.
- **Large Households.** There is a smaller share of larger households (5 or more people) in Turlock at 12.6 percent compared to Stanislaus County at 17.8 percent. Turlock also holds a larger share of single-person households at 22 percent compared to 20.3 percent for the County. However, these households tend to be less cost burdened and are less likely to be extremely low-income.
- **Persons Experiencing Homelessness.** As a share of the total population of Stanislaus County, the number of people experiencing homelessness is not large (2,052 individuals). As of January 2024, the rate of homelessness in the county decreased since last year 2023, from 2,091 individuals to 2,052 individuals. The City of Modesto had the highest amount of individuals experiencing homelessness at 1,622, while Turlock was the second highest, by substantially less at 201 individuals.¹
- **Farmworkers.** Overall, the farmworker population in Stanislaus County has decreased dramatically since 2000 as the mechanization of agriculture has proceeded and the need for seasonal farmworkers declines. However, the number of permanent farmworkers has increased by approximately 2 percent over the same period. Still, farmworkers represent about 4 percent of the total population in Turlock, and number of student migrant workers has decreased only slightly since 2016-2017. Given the seasonal nature of this work for at least a portion of this group, the special needs of this segment of the population is an important consideration.

Housing Market Characteristics

EXISTING TYPOLOGIES

Today, the existing housing stock in Turlock is predominantly comprised of detached single-family homes, as shown on Chart 2-5. There are a few multi-family complexes along key commercial corridors, including Geer Road, West Linwood Avenue, and Downtown. Some residential neighborhoods in Northwest Turlock, near CSU Stanislaus, have a mix of single-family attached homes, apartments, and condominiums. Between 2014 and 2024, there has been modest housing development in Turlock. The number of detached single-family homes has increased approximately 4 percent during this period. The number of total units has increased by 3 percent over this period driven mostly by the addition of detached single-family homes, which mirrors the housing growth in Stanislaus County as well (increase of 3.4 percent overall). There have been several residential projects in Turlock either approved or under review as of July 2024. These projects

¹ Stanislaus Community System of Care (CSOC), 2024. Stanislaus County Homeless Point-In-Time Count.

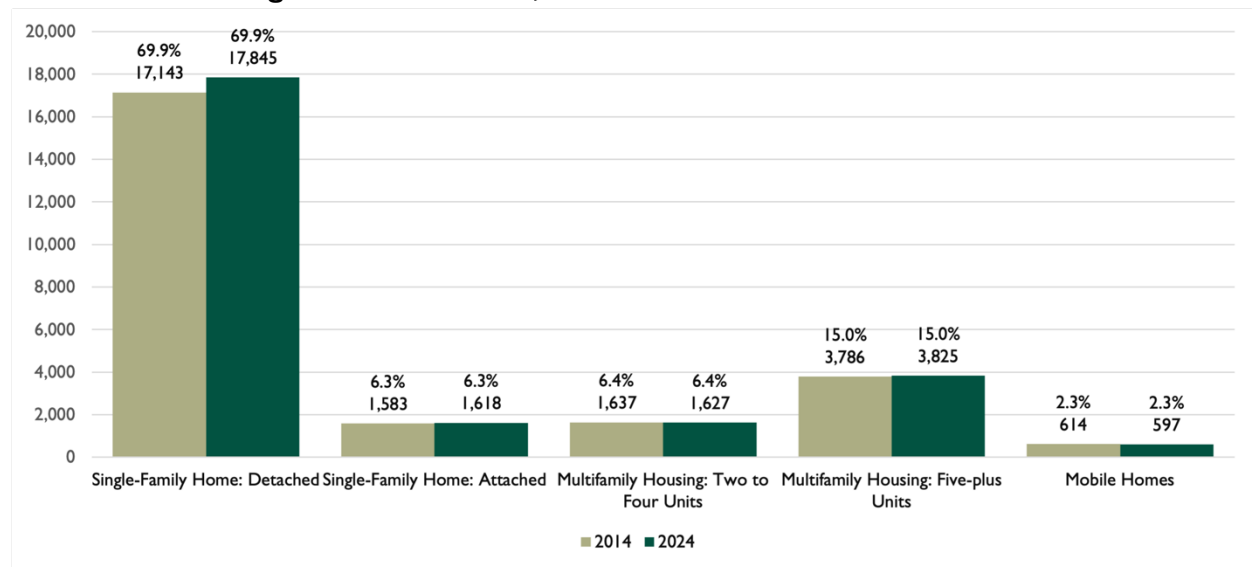
<https://csocstan.com/wp-content/uploads/2024/07/English-2024-Stanislaus-County-PIT-Homeless-Count-Executive-and-Data-Summary.pdf>

would add 847 multi-family units and 290 single-family residential units, as discussed further in Chapter 3: Housing Resources.

AGE OF HOUSING STOCK

The condition of the housing stock, including the age of buildings and units that may be in substandard condition, is also an important consideration in a community’s housing needs. In Turlock, just under 10 percent of the housing stock was constructed prior to 1980 and is over 40 years old. About 24 percent of the housing stock has been constructed since 2000, with only 4.4 percent constructed since 2010. See Chart 2-6 for the age of Turlock’s housing stock as of 2022.

Chart 2-5: Housing Stock in Turlock, 2024



Source: California Department of Finance E-5 and E-8 Series City/County Population and Housing Estimates

TENURE

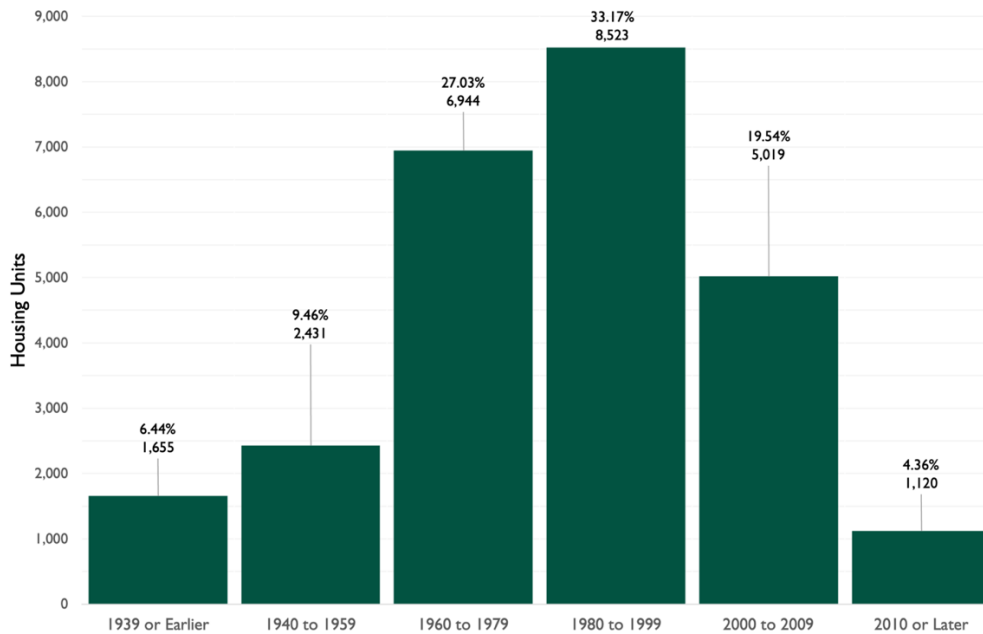
Since 2000, the percentage of renter-occupied households in Turlock has risen slightly. In 2000, the proportion of owners was 55.8 percent and the proportion of renters was 44.2 percent. However, in 2020 approximately 46.3 percent of all households were occupied by renters, see Chart 2-6. In addition, households occupied by both renters and owners have increased in absolute numbers; while there were 8,133 renter-occupied households and 10,275 owner-occupied households in 2000, there were 11,792 renter-occupied households and 13,652 owner-occupied households in 2020.

AFFORDABILITY

The most commonly used definition of affordable housing comes from HUD. According to HUD, the metric for housing affordability is whether the occupants are paying no more than 30 percent of their income for gross housing costs, including utilities. Turlock has seen a dramatic increase in housing costs in recent years. As shown in Chart 2-8, home values in the city increased by 100 percent between 2014 and 2024. Rents in Turlock and the county were generally stable between the 2012 and 2017 period, increasing by about 4 percent and 4.8 percent. However, between 2017 and 2022 rents spiked in Turlock—increasing by about 40.2 percent—while the county experienced a slightly lower rent increase at approximately 38 percent. This substantial rent increase over between 2017 and 2022 echoes cost of living increases that have occurred across California. In Turlock, 20 percent of households (5,090 households in total) are cost

burdened (meaning they spend 30 to 50 percent of their income on housing-related costs), while 16.7 percent (4,250 households in total) are severely cost burdened (spend more than 50 percent of their income on housing) (Chart 2-9). Further, renters are particularly impacted by cost burden, as, unlike homeowners,

Chart 2-6: Age of Turlock Housing Stock, 2022



Source: U.S. Census Bureau, American Community Survey 5-Year Data (2018-2022), Table B25034

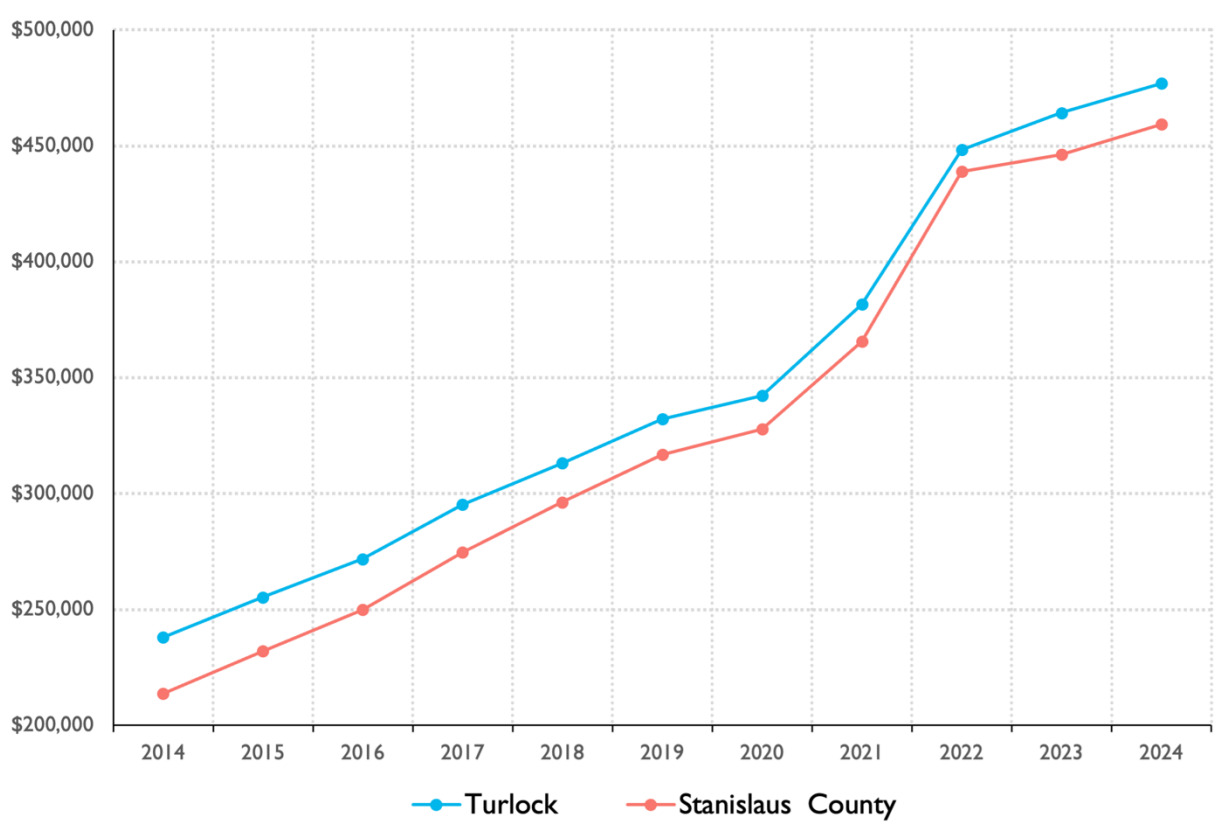
Chart 2-7: Turlock Household Tenure, 2000 to 2020



Source: U.S. Census Bureau, Census 2000 SFI, Table H04; U.S. Census Bureau, Census 2010 SFI, Table H04; U.S. Census Bureau, American Community Survey 5-Year Data (2016-2020), Table B25003

they cannot build equity with their homes. Renters in Turlock tend to have higher rates of cost burden than owners – for instance, 48 percent of all renters experience some level of cost burden while only 27 percent of owners do.

Chart 2-8: Housing Affordability in Turlock



Source: Zillow, ZHVI January 2011 – January 2024

Economic Characteristics

INDUSTRY SECTORS

According to ACS 2022 five-year estimates, there are 31,746 persons in the labor force in the City of Turlock. As seen in Chart 2-10, the largest industry represented among Turlock workers is Health and Educational Services (27.7 percent) which is a greater share of the workforce represented in the industry compared to the county (21.4 percent). Compared to Stanislaus County, employees in the Construction industry account for significantly less of Turlock’s employment distribution (6.4 percent) than that of the county (8.9 percent).

MAJOR EMPLOYERS

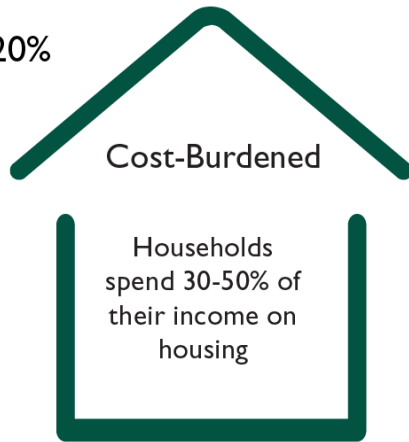
Table 2-2 provides an overview of the major employers in Turlock. The following four major employers provide the largest employment base for residents and non-residents of the city: Foster Farms Poultry, Turlock Unified School District, Emanuel Medical Center, and California State University Stanislaus, aligning with the two largest industries presented in Chart 2-10 above: Health & Educational Services and

Chart 2-9 Cost Burden in Turlock

In 2020:

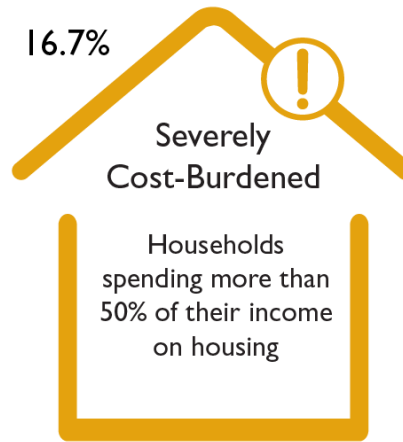
5,090 households were cost-burdened

20%



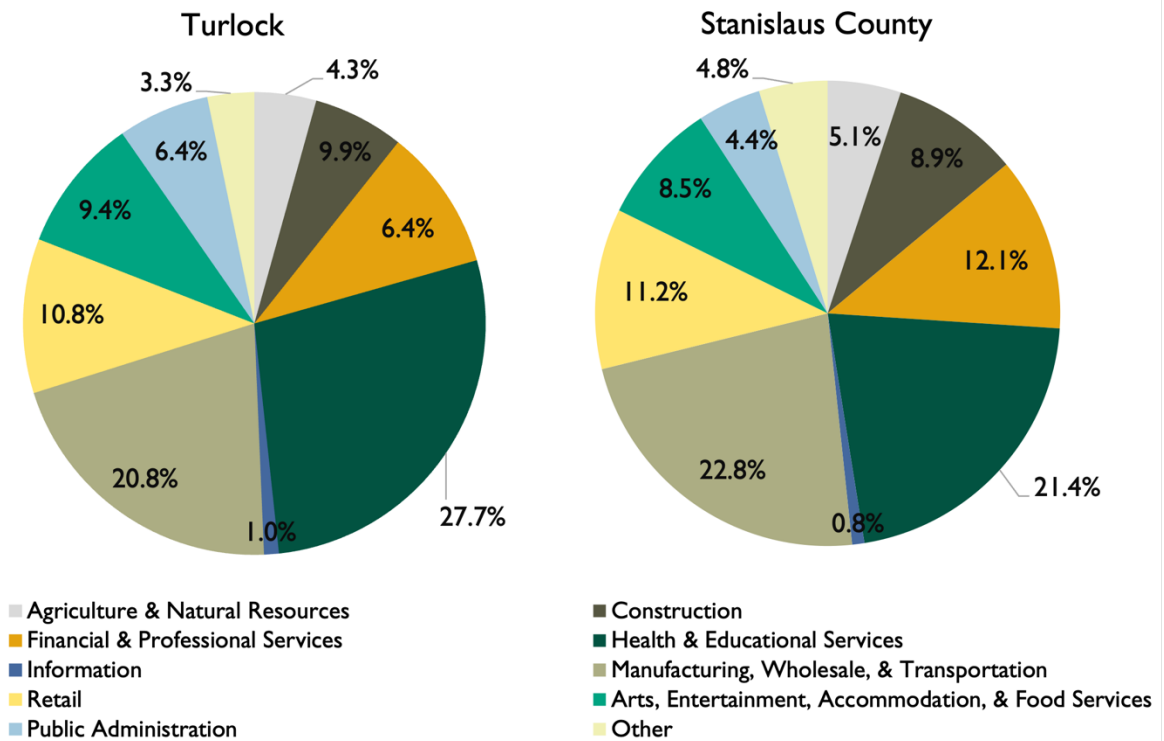
4,250 households were severely cost-burdened

16.7%



Renters are more likely to experience cost burden, with about 50% experiencing some level of cost burden versus approximately 30% for owners.

Chart 2-10: Turlock and Surrounding Areas Employment by Industry, 2022



Source: U.S. Census Bureau, American Community Survey 5-Year Data (2018-2022), Table S2405

Manufacturing, Wholesale and Transportation. All four major employers have an employment base of at least 1,000 people, according to the Stanislaus County Comprehensive Economic Development Strategy 2023-2028. Additionally, Turlock is well-known for its agricultural setting, which has historically provided a basis for the city's industry. Food processing is the primary industry, providing a large number of industrial and manufacturing jobs. Turlock also boasts an agri-business cluster, with several new emerging technical software and laboratories to bolster this cluster.

Table 2-2 Major Employers in Turlock

| <i>Employer</i> | <i>Employees</i> | <i>Description</i> |
|--|------------------|------------------------------|
| Manufacturing | | |
| Foster Farms Poultry | 2,000 | Poultry Processor |
| Blue Diamond Growers | 500 | Nut Processor |
| Super Store Industries/Sunnyside Farms | 340 | Dairy and Juice Products |
| SupHerb Farms | 209 | Culinary Herbs and Blends |
| Associated Feed & Supply Co | 191 | Animal Feed Processor |
| Sensient Dehydrated Flavors | 182 | Food Processor |
| Non-Manufacturing | | |
| Turlock Unified School District | 2,000 | School District |
| California State University Stanislaus | 1,000 | Public University |
| Emanuel Medical Center | 1,100 | Health Care |
| Amazon | 981 | Distribution Center |
| City of Turlock | 650 | City Government |
| TID | 450 | Water and Electric Utility |
| Home Depot | 201 | Retailer |
| Freshpoint | 200 | Distribution Center |
| Crimetek Security | 185 | Investigation and Security |
| Costco | 180 | Retailer |
| Walmart | 165 | Retailer |
| Covenant Retirement and Care | 165 | Nursing and Residential Care |
| Target | 150 | Retailer |
| Save Mart Supermarkets | 145 | Retail Grocer |
| Raley's | 134 | Retail Grocer |
| Northern Refrigerated | 100 | Freight Trucking |

Source: Stanislaus County Comprehensive Economic Development Strategy 2023-2028, Table 12

COMMUTING TRENDS

U.S. Census Bureau OnTheMap tool displays where workers are employed and where they live. As shown on Map 2-3, the U.S. Census identified 27,814 workers in the City of Turlock in 2021, of whom 19,829 commute from outside of the city, which represents 71.3 percent of the total worker population. Approximately 7,985 people both live and work in Turlock, which accounts for only 28.7 percent of total worker population. About 22,347 workers who live in Turlock commute outside of the city for work. This

means almost three times the number of workers commute out of Turlock compared to those who live and work in the city. Additionally, there are less number of workers who commute into Turlock (19,829) as compared to those who live in Turlock and commute out of the city to work (22,347).

TRANSIT ROUTES

Turlock Transit operates seven different individual routes that serve the communities of Turlock and Denair, as shown in Map 2-2. Routes travel along main corridors in Turlock such as Golden State Boulevard, Hawkeye Avenue, Geer Road, and Lander Avenue, and provide connection to prominent locations in Turlock, including CSU Stanislaus, Emmanuel Medical Center, middle and high schools, and Downtown. HCD guidance and best practices for selecting sites to accommodate lower income RHNA include proximity to transit and access to amenities and jobs.

Additionally, there is planned expansion of regional rail service within San Joaquin Valley and Stanislaus County in the coming years. San Joaquin Regional Rail Commission (SJRCC) oversees the Valley Rail Program, a project that will expand and increase passenger rail in the Northern San Joaquin Valley to Sacramento and the Bay Area. SJRCC was awarded funding for the Altamont Corridor Express (ACE) Ceres-Merced Extension Project in 2023, which envisions extensions of the ACE southward to Merced and includes a station in Turlock. The proposed station would connect to the Turlock Transit Center by an elevated pedestrian bridge and would include over 200 parking spaces. Rail service is anticipated to begin in 2029. The ACE Ceres-Merced Extension would connect Turlock to the North Lathrop Station that provides regional connectivity to Sacramento and the Bay Area.

Recent Development Trends

During the 2014 to 2024 period, the City saw construction of 1,014 new homes, as shown on Table 2-3. The majority of new homes built were detached single-family houses, with 277 multifamily units constructed. A signature achievement for the City during the 2015-2023 period was the completion of the Avena Bella affordable housing community. Located on a 4.3-acre site in the southwestern part of the community, Avena Bella Phase 2 is a 61-unit affordable housing project consisting of garden-style two-, and three-bedroom apartments oriented around public and open space areas. The LEED Platinum certified project features a community center, pool and computer lab with after-school support for youth. Avena Bella was awarded esteemed Vanguard Award for New Construction from the National Affordable Housing Management Association.

Table 2-3: Units Constructed in Turlock, 2014-2024

| Building Type | 2014 | | 2024 | | Change (2014 – 2024) |
|------------------------------|---------------|-------------|---------------|-------------|-------------------------|
| | Number | Percent | Number | Percent | |
| Single-Family Home: Detached | 17,143 | 69.2% | 17,845 | 69.2% | +702 |
| Single-Family Home: Attached | 1,583 | 6.4% | 1,618 | 6.3% | +35 |
| Multifamily Housing | 6,037 | 24.4% | 6,314 | 24.5% | +277 |
| Total | 24,763 | 100% | 25,777 | 100% | +1,014 |

Source: California Department of Finance E-5 and E-8 Series City/County Population and Housing Estimates, City of Turlock, 2024

During the 2015-2023 Housing Element Cycle, the City of Turlock saw more housing approved or constructed than any other city in Stanislaus County except Modesto, as shown in Table 2-4. The City issued permits for 1,438 new homes during the prior cycle and met its RHNA obligations for the Moderate-income category. Continued buildout of the Northeast Turlock Master Plan, East Tuolumne Master Plan, and Northwest Triangle Specific Plan together with development of other vacant sites in the city saw permits issued for 486 new homes in the Above Moderate-income category. While the cost of infrastructure improvements in the Morgan Ranch Master Plan area has been a challenge to development, one property owner in the Master Plan area is preparing an application for a first phase of development in the area which will include apartments and town homes. The City of Turlock has also initiated design of the sewer lift station needed in the Master Plan area and will fund construction of the lift station with sewer impact fees to spur construction of necessary infrastructure for this area.

As in communities throughout California, the cost of construction and the availability of financing is a significant constraint on the development of housing for Low and Very Low-income households. Construction cost is affected by a variety of factors, including the national demand for materials and commodities, and the supply of local construction labor. The availability of financing is affected by factors that the local government cannot control, including interest rates, credit worthiness of borrowers, and the willingness of investors to supply capital for real estate. The principal mechanisms available to the City of Turlock to support the production of housing relate to zoning regulations, permitting and approval processes, and fees, which influence the time and cost required for development.

Table 2-4: StanCOG Jurisdictions 5th Cycle RHNA Performance

| Jurisdiction | 5th Cycle RHNA Allocation | | | | | Units Accommodated During 5th Cycle | | | | | Percent Accommodated During 5 th Cycle | | | | |
|--------------------------|---------------------------|------------|------------|--------------|--------------|-------------------------------------|------------|------------|--------------|--------------|---|--------------|---------------|--------------|--------------|
| | VL | Low | Mod | Above Mod | Total | VL | Low | Mod | Above Mod | Total | VL | Low | Mod | Above Mod | Total |
| Ceres | 622 | 399 | 446 | 1,104 | 2,571 | 0 | 1 | 12 | 71 | 84 | 0.0% | 0.3% | 2.7% | 6.4% | 3.3% |
| Hughson | 53 | 34 | 38 | 93 | 218 | 0 | 0 | 0 | 91 | 91 | 0.0% | 0.0% | 0.0% | 97.8% | 41.7% |
| Modesto | 1,546 | 991 | 1,100 | 2,724 | 6,361 | 103 | 71 | 303 | 1,026 | 1,503 | 6.7% | 7.2% | 27.5% | 37.7% | 23.6% |
| Newman | 186 | 119 | 136 | 337 | 778 | 0 | 1 | 3 | 48 | 52 | 0.0% | 0.8% | 2.2% | 14.2% | 6.7% |
| Oakdale | 315 | 202 | 210 | 520 | 1,247 | 14 | 44 | 84 | 382 | 524 | 4.4% | 21.8% | 40.0% | 73.5% | 42.0% |
| Patterson | 636 | 408 | 416 | 1,031 | 2,491 | 0 | 0 | 0 | 0 | 0 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Riverbank | 321 | 206 | 217 | 536 | 1,280 | 33 | 38 | 0 | 148 | 219 | 10.3% | 18.4% | 0.0% | 27.6% | 17.1% |
| Unincorporated County | 538 | 345 | 391 | 967 | 2,241 | 0 | 29 | 44 | 556 | 629 | 0.0% | 8.4% | 11.3% | 57.5% | 28.1% |
| Turlock | 877 | 562 | 627 | 1,552 | 3,618 | 18 | 279 | 655 | 486 | 1,438 | 2.1% | 49.6% | 104.5% | 31.3% | 39.7% |
| Waterford | 131 | 84 | 89 | 221 | 525 | 0 | 0 | 2 | 34 | 36 | 0.0% | 0.0% | 2.2% | 15.4% | 6.9% |

Source: California Department of Housing and Community Development, 2024

3 Housing Resources

The Housing Element is a component of the General Plan which guides planning for housing to meet the current and projected needs of all households in the community. This chapter summarizes the various resources available for the preservation, improvement, and development of housing in Turlock. The analysis includes an evaluation of the availability of land resources available to accommodate the City's share of the region's future housing needs, as well as the administrative resources available to assist in implementing the City's housing programs and policies, and the financial resources available to support housing activities.

Land Resources

Government Code (GC) Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites with the potential for redevelopment. The inventory must identify specific parcels that are available for residential development and be accompanied by an analysis of public facilities and services capacity to serve the identified sites. Further, the inventory must have sufficient capacity to accommodate the jurisdiction's share of the regional housing need, as determined by the applicable council of governments, in this case Stanislaus Council of Governments (StanCOG).

This section presents the City's inventory, identifying sites available for residential development and their realistic capacity for housing. It identifies planned and recently approved residential projects in Turlock and it details the process for identifying suitable sites, the methodology for calculating capacity, and the availability of public facilities and services available to serve new housing.

LEGAL REQUIREMENTS FOR INVENTORY AND SITES

State law requires that a community identify an adequate number of sites to accommodate and facilitate production of the City's RHNA share. To determine whether the City has sufficient land to accommodate its share of regional housing needs for all income groups, the City must identify "adequate sites." Land considered suitable for residential development includes the following:

- Vacant sites zoned for residential use.
- Vacant sites zoned for nonresidential use that allow residential development.
- Residentially zoned sites that are capable of being developed at a higher density (non-vacant sites, including underutilized sites).
- Sites owned or leased by a city, county, or city and county

- Sites zoned for nonresidential use that can be redeveloped for residential use and a program is included in the Housing Element to rezone the site to permit residential use within three years of adoption.

Further, State law stipulates criteria for the adequacy of sites included on the inventory, including that they be zoned to accommodate housing, have appropriate development standards, and be served by public facilities as needed to facilitate the development of a variety of housing products suitable for all income levels. Vacant sites included on prior inventories in two or more consecutive planning periods and non-vacant sites included on the prior period inventory cannot be carried forward to the current planning period to satisfy the need for housing affordable to lower income households unless they are rezoned to allow residential use by right at the default density for the jurisdiction, which in Turlock's case is 20 dwelling units per acre.

Additional suitability criteria apply to sites identified to accommodate lower income RHNA, including that they be of appropriate size, be free from environmental constraints, be zoned to accommodate housing, have appropriate development standards, and be served by public facilities. The intent of these criteria is to help ensure that sites identified for lower income RHNA are viable candidates for housing and can be feasibly developed in the near term. In view of feasibility considerations, parcels that are less than 0.5 acres in size are generally not considered suitable for lower income housing development as smaller parcels may not allow development of a sufficient number of units for proposed affordable housing projects to compete effectively for limited funding resources. Parcels larger than 10 acres in size are also not considered suitable by HCD as development of very large projects may lead to an over concentration of affordable housing in one location or may render proposed affordable housing projects ineligible for funding.

REGIONAL HOUSING NEEDS ALLOCATION

The Regional Housing Needs Allocation (RHNA) is the total number of new housing units that the City must plan to accommodate in the 2023-31 planning period. RHNA is split into four categories representing different levels of affordability, based on median income level in the county. RHNA is established through the following process: the California Department of Housing and Community Development (HCD) first determines the estimated need for new housing in each region of California for the planning period, based on population projections and other factors including rates of vacancy, overcrowding, and cost-burden. Each council of governments (COG) then allocates a target to each city or town within its jurisdiction, considering factors such as access to jobs, good schools, and healthy environmental conditions. For Stanislaus County, StanCOG developed and refined a methodology for 2023-31 RHNA allocations with input from local jurisdictions. The StanCOG's Policy Board adopted the 6th Cycle Final RHNA Allocation, Methodology, and Regional Housing Needs Determinations on June 16, 2022. Turlock's Regional Housing Needs Assessment (RHNA) allocation for the 2023-31 planning period has been determined by StanCOG to be 5,802 housing units, including 1,305 units for very low-income households, 903 units for low-income households, 1,096 units for moderate-income households, and 2,498 units for above moderate-income households (Table 3-1). AB 2634 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 Area Median Income or AMI).

Table 3-1: Regional Housing Needs Allocation (2023-2031)

| <i>Income Group</i> | <i>% of County AMI</i> | <i>Number of Units Allocated</i> | <i>Percent of Total Allocation</i> |
|---------------------|------------------------|----------------------------------|------------------------------------|
| Very Low | 0-50% | 1,305 | 22.5% |
| Low | >50-80% | 903 | 15.6% |
| Moderate | >80-120% | 1,096 | 18.9% |
| Above Moderate | 120%+ | 2,498 | 43.0% |
| Total | | 5,802 | 100.0% |

Source: Stanislaus Council of Governments, 2022

SITE IDENTIFICATION

To identify potential sites for new housing, a parcel-based analysis of properties within the City limit was conducted using County Assessor data. Vacant sites were identified, along with underutilized non-vacant sites with potential for redevelopment within the planning period. Two primary metrics were used to identify underutilized parcels: assessed value ratio (A/V) and low as-built floor area ratio (FAR). A/V ratio considers the relationship between the value of the land and the improvements constructed on it. Where the value of the land is worth substantially more than the value of the structures on it, there is an incentive for the owner to redevelop with new uses that command higher rents or sales prices. Similarly, a low FAR means that the square footage of buildings is small compared to the overall size of the site, indicating the potential for redevelopment with other uses. A commercially zoned property containing a low-slung shopping center with large areas of surface parking could be considered underutilized, particularly if vacancy rates are high. Areas where vacant and underutilized sites cluster are locations where change is most foreseeable over the planning period and are an important focus of planning activities. Based on this analysis, four "opportunity areas" where change is foreseeable over the planning period were identified: Downtown, North Golden State, Geer Road, and West Main.

Between February 1 and March 1, 2024, over 1,500 residents and property owners in Turlock participated in the Turlock Community Survey. Paper surveys were mailed to over 30,000 addresses listed in a Turlock mailing list, including property owners and renters with addresses in the City. The survey focused on four opportunity areas of Turlock with the greatest potential to accommodate new housing or other types of development in the coming years, and the questions were designed to gather feedback that will help plan where new housing, employment, and shopping should be located and how to achieve other community objectives like improving roadway infrastructure and revitalizing older commercial streets. A survey report was prepared to document community input collected and present key implications for the planning process, which can be found in Appendix G.

Drawing on the community input received, a sites inventory of sites available for housing and key strategies to facilitate housing development on the identified sites was prepared and reviewed with the Planning Commission at a public meeting on July 18, 2024. The inventory and strategies were refined based on feedback from the Planning Commission and included in this Draft Housing Element.

CAPACITY PROJECTIONS

Projections for the capacity of the sites identified to accommodate new housing were based on a review of recently approved and constructed housing in Turlock and surrounding communities. Sites with zoning that permits single-family residential development, including the Very Low Density, Low Density, and Medium Density designations, were assumed to develop with one unit per parcel, consistent with past performance in those districts. To develop realistic capacity projections for sites with zoning that permits multifamily housing, a survey of recently approved and constructed multifamily projects in Turlock and surrounding communities was conducted. The survey identified representative projects in Turlock, Modesto, Merced, Patterson, and Oakdale. Profiles of these projects, including location, applicable zoning, site characteristics, aerial photos, and site plans, are included in Appendix F.

The average as-built density of recent projects surveyed was 30.5 dwelling units per acre (du/ac), with a range from approximately 20 du/ac along commercial corridors to 47 du/ac in downtown settings. Current land use and zoning regulations in Turlock permit housing development at comparable densities in the Downtown Mixed Use and High Density Residential designations, where housing is permitted at up to 40 du/ac. These designations apply in the downtown area and along major arterial roadways, including Geer Road, Christoffersen Parkway, Monte Vista Avenue, and Fulkerth Road as well as in the Morgan Ranch Master Plan area. In these locations, residential development on available sites was assumed at 80 percent of the maximum permitted density, which is comparable to the average as built density of recent high density projects surveyed. For vacant sites, the assumed density was applied to the gross site area; for example, a 1-acre vacant site with a maximum permitted density of 40 du/ac was assumed to have a realistic capacity for 32 new homes, reflective of the densities in other recently approved projects in Turlock and surrounding communities. For non-vacant sites where mixed use development is permitted, the existing building square footage was subtracted from the total site area, and the realistic capacity was calculated on the remaining site area. This methodology assumes that with redevelopment of the site, the level of commercial development in the future will be equivalent to what exists today. This does not preclude sites from developing with 100 percent residential uses; it simply provides a conservative estimate of residential capacity.

AFFORDABILITY ASSUMPTIONS

State law allows jurisdictions to use higher density as a proxy for lower income affordability. Pursuant to Government Code section 65583.2(c)(3), a density of at least 20 du/ac is deemed affordable to lower income households in Turlock. Accordingly, sites that meet the suitability criteria described above and that permit density of 20 du/ac or more are counted toward lower income RHNA. Sites that are too small or otherwise do not meet the suitability criteria, but which have zoning that permits at least 20 du/ac are counted toward Moderate and Above Moderate income RHNA. Sites zoned for single-family residential development are counted toward Above Moderate income RHNA.

As described more fully in Appendix F, a study of what Moderate income households of various sizes in Turlock can afford to pay for housing in comparison to typical rents and sales prices in the area indicates that, on a per square foot basis, rental housing is within the maximum affordable monthly payment for households making between 80 and 120 percent of the countywide area median income. However, the typical home price of for sale product exceeds the maximum affordable to Moderate income households of all sizes. Additionally, a review of multifamily housing built in Turlock since 2010 indicates that the vast majority are rental apartments, and all multifamily housing built in the city during the 2015-2023 cycle was rental product. Therefore, for the purpose of realistic projections, this analysis assumes that on sites zoned for higher density housing that do not meet the lower income suitability criteria, 70 percent of the units will

be affordable to Moderate income households and 30 percent will be affordable to Above Moderate income households.

CAPACITY UNDER CURRENT ZONING

This section introduces the capacity for new housing in Turlock under current zoning (without rezoning), accounting for State guidance for site suitability. Maps showing the sites where housing development is projected are within each opportunity area and citywide are also provided.

Pipeline Projects

According to HCD Guidance, projects that have been approved, permitted, or received a Certificate of Occupancy during the projection period (June 30, 2023 – December 15, 2031) can be counted toward the 2023-31 cycle RHNA. Table 3-2 details these pipeline projects and they are shown on Map 3-1. In total, there are 14 projects that involve construction of 1,137 units, including 6 very low- and low- income units, 361 moderate-income units, and 770 above moderate-income units. Assignments to income categories represent commitments from project proponents.

Table 3-2: Pipeline Projects

| Address | APN(s) | Project Description | Project Status | Site Size (acres) | Income Category | | | Total Units |
|------------------|-----------------|--|------------------|-------------------|------------------|----------|----------------|-------------|
| | | | | | Very Low and Low | Moderate | Above Moderate | |
| 4118 N Tegner Rd | 087-026-001-000 | Construct seven 3-story townhouse style buildings with a patio or balcony, garage or carport, rooftop terraces and parking spaces. Construct driveway entrances for the project. | Approved 5/3/22 | 1.74 | | 31 | | 31 |
| 4131 Geer Rd | 071-066-067-000 | Construct nine 3-story buildings with patio or balcony. Construct parking or carports, landscaping, clubhouse and pool, and 900 sq. ft. outdoor play area. | Approved 1/31/23 | 8.58 | | 130 | 131 | 261 |
| 1150 Angelus St | 050-005-059-000 | Construct triplex apartment building; each unit | Approved 6/15/22 | 0.84 | | 3 | | 3 |

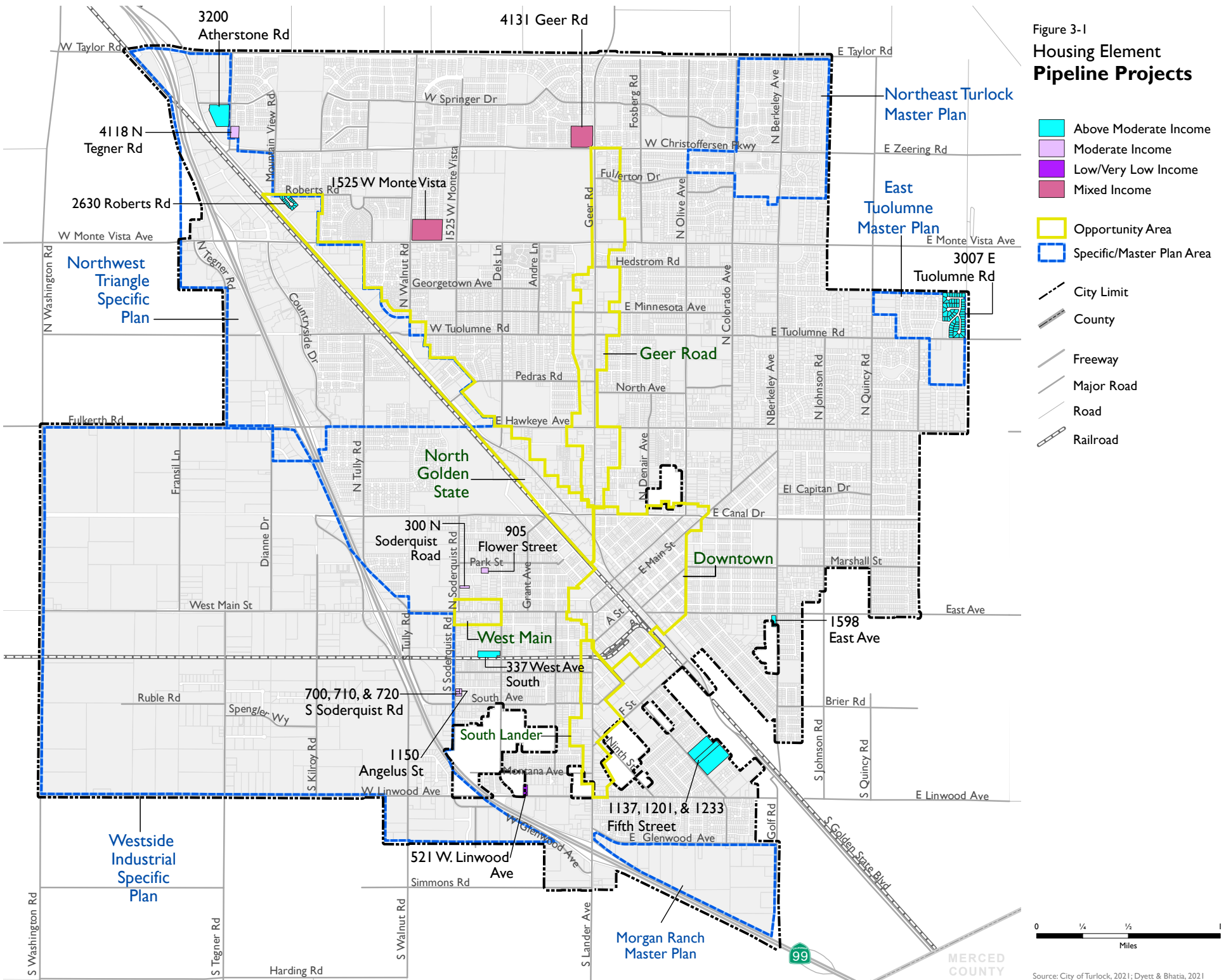
| Address | APN(s) | Project Description | Project Status | Site Size (acres) | Income Category | | | Total Units |
|---------------------------------|---------------------------------------|--|-----------------|-------------------|------------------|----------|----------------|-------------|
| | | | | | Very Low and Low | Moderate | Above Moderate | |
| | | with two bedrooms, one bathroom, kitchen, living room, and outdoor patio area. Paving, 5 parking spaces and landscaping included. | | | | | | |
| 1598 East Ave | 043-027-034-000 | Rezone property from Community Commercial to Low Density Residential to allow subdivision of parcel into 6 lots | Under Review | 0.91 | | | 6 | 6 |
| 521 W. Linwood Ave. | 050-017-015 | Demolition of two current buildings, building of two new buildings: 4-bedroom home for youth and combination learning center/outpatient behavioral health services | Under Review | 0.82 | 6 | | | 6 |
| 2630 Roberts Rd | 087-027-001 through 087-027-016 | Subdivide 2.7 acre parcel into 16 single family residential lots and divide two existing commercial lots into four lots and a remainder | Under Review | 2.7 | | | 16 | 16 |
| 700, 710, & 720 S Soderquist Rd | 050-005-064; 050-005-065; 050-005-067 | Construction of a triplex on parcel #4, and duplexes on parcel #3 and #1 | Under Review | 0.62 | | 7 | | 7 |
| 3007 E Tuolumne Rd | 073-013-004 | 3 year time extension | Approved 4/5/18 | 1.22 | | | 60 | 60 |

City of Turlock 2023-2031 Housing Element

| Address | APN(s) | Project Description | Project Status | Site Size (acres) | Income Category | | | Total Units |
|---------------------------------|--|---|--------------------|-------------------|------------------|------------|----------------|--------------|
| | | | | | Very Low and Low | Moderate | Above Moderate | |
| 3200 Atherstone Rd | 087-029-003 | Increase number of units for condominium project from 140 to 175, 3 year time extension granted 6/7/18 | Approved 1/17/2019 | 7.15 | | | 175 | 175 |
| 1137, 1201, & 1233 Fifth Street | 043-059-001; 043-016-004; 043-016-006; | Subdivide three parcels into 178 single-family residential lots | Approved 5/11/2021 | 15.6 6 | | | 178 | 178 |
| 1525 W. Monte Vista | 071-004-009 | Construct a total of 12 three-story buildings | Approved 8/13/2021 | 12 | | 174 | 174 | 348 |
| 337 West Avenue South | 050-003-042 | Subdivide the approximately 2.67-acre parcel, into 30 single-family residential lots. | Under Review | 2.67 | | | 30 | 30 |
| 300 N. Soderquist Road | 061-003-040 | Construct a residential 5-plex multifamily dwelling | Approved 7/16/2024 | 0.46 | | 5 | | 5 |
| 905 Flower Street | 061-004-006 | Construct four additional two-story units and adding an additional bedroom to the six existing units on the .72-acre property | Approved 7/16/2024 | 0.72 | | 11 | | 11 |
| | | | | | 6 | 361 | 770 | 1,137 |

Source: City of Turlock, 2024; Dyett & Bhatia, 2024

Figure 3-1
**Housing Element
 Pipeline Projects**



Source: City of Turlock, 2021; Dyett & Bhatia, 2021

Morgan Ranch Master Plan

Adopted in 2015, the Morgan Ranch Master Plan outlines land use and development standards for the 170.7-acre Plan Area, a roughly triangular area that is bounded by State Highway 99 to the south, Golf Road to the east, and Glenwood Avenue to the north. The Plan Area includes 120.2 acres of land classified for Medium Density Residential and 15 acres of land classified to High Density Residential. Located on both sides of the new Morgan Ranch arterial road, Medium Density Residential (7.5 to 9 du/ac) is the predominant land use classification within the Plan Area and is intended to provide entry-level housing opportunities of single-family homes and duplexes within easy walking and biking distance to neighborhood parks and the new elementary school. The sites inventory can accommodate 875 single-family homes in these areas, which would be market rate homes affordable to above moderate-income households.

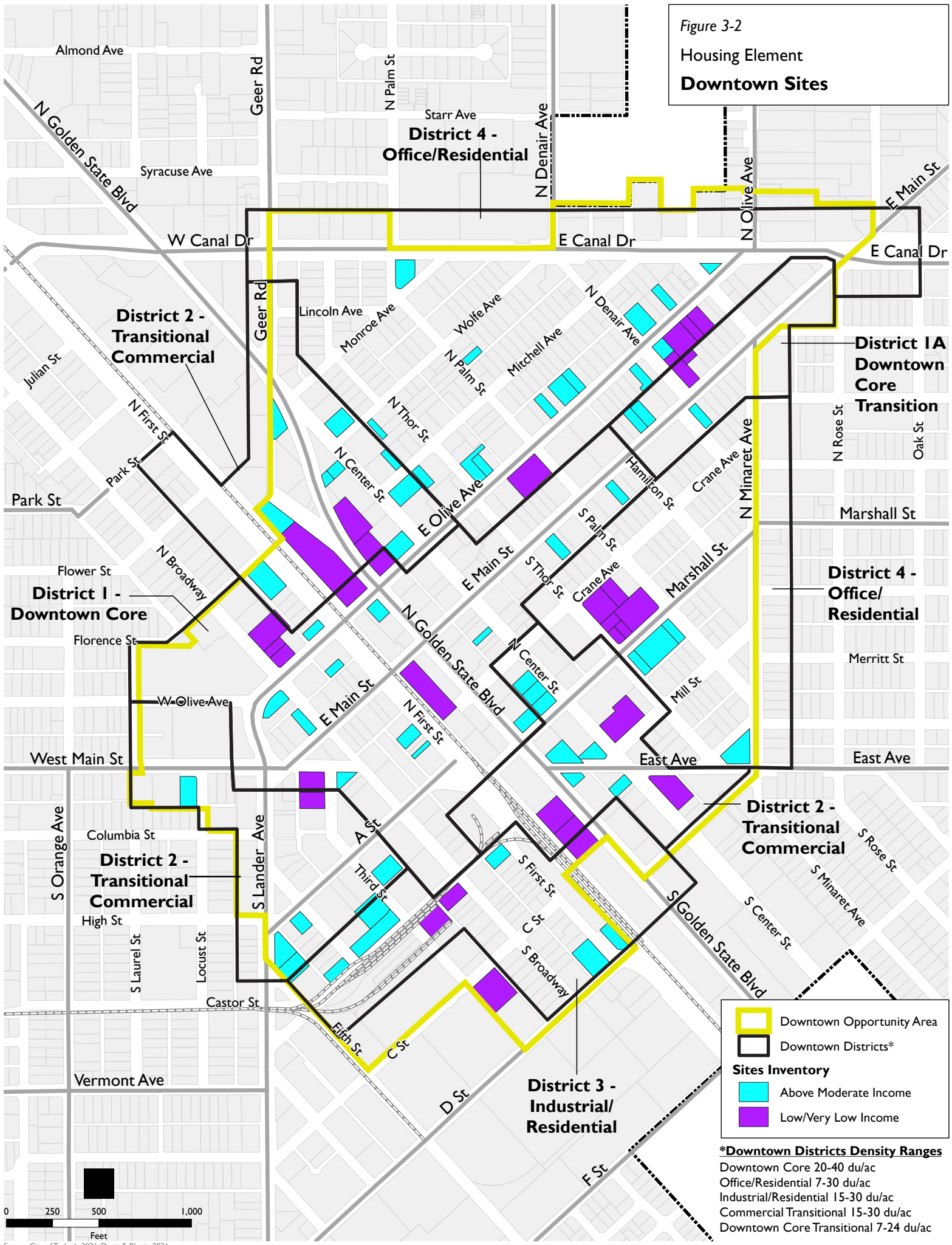
The Master plan also includes a High Density Residential (17 to 40 du/ac) land use classification intended to support compact development, provide housing choices to match changing demographics, and facilitate needed affordable housing with a variety of designs. Product types on the higher end of this range, such as apartment or condominiums are counted toward VL/L income RHNA, while townhomes are counted toward Moderate income RHNA. As such, the sites inventory can accommodate 450 VL/L units.

Downtown

Downtown Turlock is the city's business and historic district, with shops, eateries, offices, and potential for redeveloping underutilized areas along East Olive Avenue, East Main Street, South Center, and North Thor. With its narrow streets, short blocks, and historic buildings, the Downtown area is a walkable environment with transit options. HCD best practices for selecting sites to accommodate lower income RHNA include proximity to transit and access to amenities and jobs. In the citywide survey of Turlock residents, respondents indicated the highest level of support for housing in a mixed-use format downtown, with residential uses located above shops (see Appendix G).

As shown in Map 3-2, there are five Downtown Overlay Districts as defined in the Turlock Downtown Design Guidelines and Zoning Regulations document: Downtown Core (DC), Downtown Core Transition (DCT), Transitional Commercial (TC), Industrial Residential (IR), and Office Residential (OR). Residential development at up to 40 du/ac is permitted in the Downtown Core, up to 30 du/ac on properties in TC, IR, and OR overlay districts, and up to 24 du/ac in the DCT overlay district. Parcel size tends to be small; the majority of the sites are less than half an acre in size. There are few vacant parcels, but there is strong potential for redevelopment of older, underutilized commercial properties and some surface parking lots within the downtown area. Additionally, ownership patterns indicate opportunities for redevelopment, as there are 10 clusters of adjacent parcels under common ownership downtown. Adjacent parcels under common ownership can be developed together, and the resulting economies of scale help with the financial feasibility of redevelopment. Sites that meet the criteria established in State law for lower income RHNA sites were assigned to the Very Low and Low (VL/L) income category, while sites that did not meet the criteria were counted toward the Above Moderate income category. As described above, for non-vacant sites, only the net site acreage exclusive of existing commercial square footage was considered in the capacity calculation, conservatively assuming that sites will develop in a residential mixed use format. On this basis, 329 VL/L income units and 277 Above Moderate income units were assumed in the Downtown area, for a total of 606 housing units. Sites are shown on Map 3-2.

Figure 3-2
Housing Element
Downtown Sites

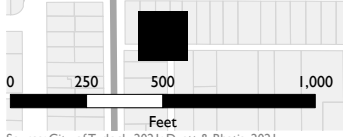


Sites Inventory

- Above Moderate Income
- Low/Very Low Income

***Downtown Districts Density Ranges**

- Downtown Core 20-40 du/ac
- Office/Residential 7-30 du/ac
- Industrial/Residential 15-30 du/ac
- Commercial Transitional 15-30 du/ac
- Downtown Core Transitional 7-24 du/ac



Accessory Dwelling Units

Accessory Dwelling Units can be built either as detached units on residential lots or incorporated into the primary structure. As such, there is potential for ADUs in established neighborhoods throughout Turlock. Since they are typically smaller than a single-family home, ADUs and Junior ADUs can be “affordable by design,” meaning they cost less to build, buy, or rent. As such they can offer affordable opportunities for older adults living on fixed incomes, students, retail employees, and lower income households.

Safe harbors in State Housing Element law allow for the use of local trends since 2018 to project the future rate of ADU production. On average, from 2018 to 2023, the City has issued construction permits for 8 ADUs each year (Table 3-3). By this measure, Turlock can project at least 8 ADUs per year throughout the planning period; however, as noted in HCD’s Housing Element Site Inventory Guidebook, this methodology represents “a conservative option [that] only account[s] for the effect of the new laws without local promotional efforts or incentives.” Since 2021, the annual production trend has increased notably and based on a suite of programs to further incentivize and facilitate ADU production incorporated into the Draft Housing Element, the inventory assumes 10 ADU construction permits per year through 2031 for a total of 80 ADUs throughout the planning period.

Based on a statewide study of ADU affordability,¹ it is assumed that 60 percent of the ADUs/JADUS constructed in the City of Turlock over the planning period (48 units total) will be affordable to low and very low-income households, 30 percent of these units (24 units total) will be affordable to moderate-income households, and 10 percent (8 units total) will be affordable for above moderate-income households.

Table 3-3: Recent ADU Approvals

| Year | ADU Building Permits Issued |
|-----------------------------------|------------------------------------|
| 2018 | 4 |
| 2019 | 4 |
| 2020 | 2 |
| 2021 | 5 |
| 2022 | 12 |
| 2023 | 8 |
| Total | 47 |
| Annual Average (2018-2023) | 7.83 |

Source: City of Turlock, Annual Progress Reports, 2018-2023

Vacant Residential Land

Outside of master plan and specific plan areas, there is a total of 189 vacant parcels designated for residential use. Of these parcels, 21 are designated as Very Low Density Residential, 134 are designated as Low Density Residential, 2 are designated Low-Medium Density Residential, 19 are designated as Medium Density Residential, and 13 are designated as High Density Residential. The Very Low, Low, and Low-Medium Density designations all permit single family housing. Vacant sites with these designations are projected to be developed with one unit each, counted toward Above Moderate RHNA. The High Density Residential

¹ Association of Bay Area Governments, "Affordability of Accessory Dwelling Units: A report and recommendations for RHNA 6", September 8, 2021.

designation permits housing at up to 40 du/ac, which is at a level deemed affordable to lower income households. Projected units on vacant High Density Residential sites that meet the criteria for lower income RHNA are counted toward VL/L RHNA. Sites that are too small or otherwise do not meet the criteria are counted toward Moderate and Above Moderate income RHNA using the assumptions described above. Overall, vacant residential land in Turlock can accommodate 393 very low- and low-income housing units, 133 moderate income units, and 576 above moderate-income units, for a total of 1,102 housing units. Map 3-3 shows the location of vacant residential parcels within the City limit.

Summary of Capacity Under Current Zoning

Based on strategies discussed above, under current zoning, there is capacity for 4,286 new units which represents 73 percent of the City's RHNA allocation of 5,802 units (Table 3-4). However, additional capacity to accommodate 1,552 units is needed, including 982 units at densities above 20 du/ac which are deemed affordable to lower income households. To bridge this gap, rezoning will be needed.

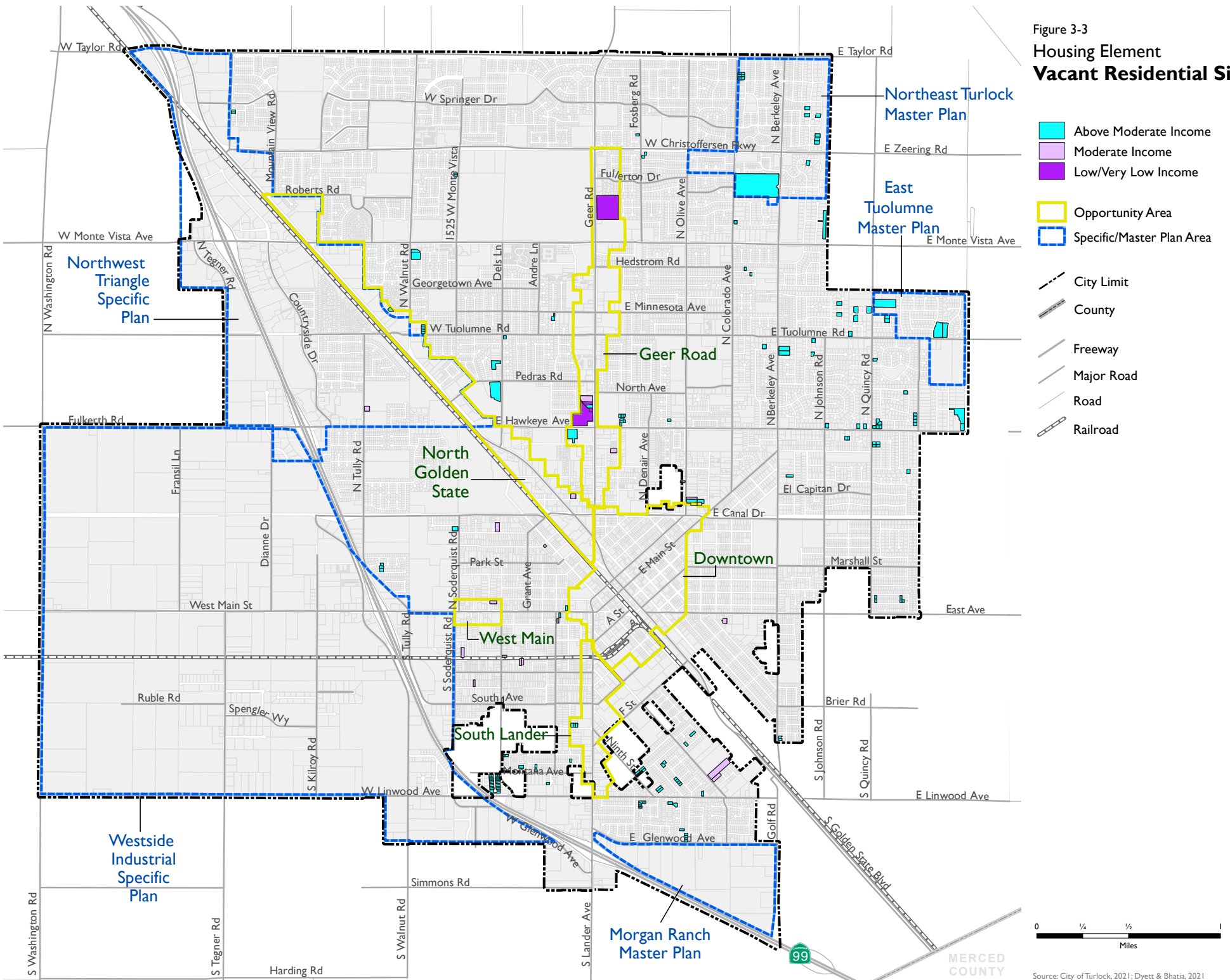
Table 3-4: Units Accommodated Under Current Zoning

| <i>Location/Strategy</i> | <i>Very Low and Low</i> | <i>Moderate</i> | <i>Above Moderate</i> | <i>Total</i> |
|--------------------------|-------------------------|-----------------|-----------------------|--------------|
| Pipeline Projects | 6 | 361 | 770 | 1,137 |
| Morgan Ranch Master Plan | 450 | | 875 | 1,325 |
| Downtown | 329 | | 277 | 606 |
| ADUs | 48 | 24 | 8 | 80 |
| Vacant Residential Land | 393 | 133 | 576 | 1,102 |
| Subtotal (A) | 1,226 | 518 | 2,506 | 4,250 |
| RHNA | 2,208 | 1,096 | 2,498 | 5,802 |
| % RHNA | 56% | 47% | 100% | 73% |

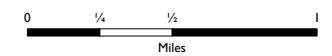
ADDITIONAL HOUSING POTENTIAL BY OPPORTUNITY AREA

Based on the community wide survey conducted in the spring of 2024, four areas were identified for potential rezoning to accommodate additional housing as needed to meet Turlock's RHNA obligations. The rezoning strategy would involve creation of a workforce housing zoning overlay that would apply to underutilized commercial properties in these areas. The overlay would continue to allow property owners to develop their land consistent with the base zoning that currently applies, while also giving them the option to develop multifamily housing suitable for teachers, restaurant and service workers, firefighters, police officers, and others employed in Turlock if they choose. The overlay would allow housing "by right" subject to objective design standards at up to 35 dwelling units per acre. Government Code Section 65583.2(h) requires that sites rezoned to accommodate a shortfall of lower income RHNA must meet the following requirements:

Figure 3-3
Housing Element
Vacant Residential Sites



- Above Moderate Income
- Moderate Income
- Low/Very Low Income
- Opportunity Area
- Specific/Master Plan Area
- City Limit
- County
- Freeway
- Major Road
- Road
- Railroad



Source: City of Turlock, 2021; Dyett & Bhatia, 2021

- Permit multifamily development "by right," subject to objective standards;
- Permit at least 16 units per site at a density of at least 20 du/ac;
- Permit 100 percent residential developments; and
- If mixed use is permitted, require that at least 50 percent of the floor area in a mixed use development be for residential uses.

This section of the chapter introduces the areas where the workforce housing overlay would apply and their capacity for housing with the new zoning overlay, accounting for community input received and State guidance for site suitability. A description of development potential in each area and maps depicting sites in each area that can potentially accommodate new housing are included. All of the sites identified to accommodate a shortfall of lower income RHNA meet the requirements of Government Code Section 65583.2(h).

North Golden State

The North Golden State corridor extends along North Golden State Boulevard, from West Tuolumne Road down to Geer Road. Today, this segment of the corridor features a variety of service commercial uses, auto-oriented business, and retail shopping centers, some with large surface parking lots and undeveloped land that could present opportunities for redevelopment. Turlock Transit Routes 3 and 5 travel on North and South Golden State Roads and provide connection to John H. Pitman High School, CSU Stanislaus, Emmanuel Medical Center, Turlock Transit Center, and shopping and restaurants in Turlock Town Center. Parcel size varies from 0.3 acres to approximately 11 acres and is generally larger than sites in the Downtown and West Main opportunity areas. Larger sites offer more opportunity for housing units and a variety of housing types and income categories. Further, there are three clusters of adjacent sites under common ownership offering some of the best opportunities for redevelopment, averaging site size of 1.37 acres. Adjacent sites under common ownership can be developed together, offering economies of scale and helping with the financial feasibility of redevelopment.

In the citywide survey, the North Golden State opportunity area received the highest level of support for high density housing, with respondents indicating preference for 4-5 story apartments (Appendix G). Survey responses also indicated support for mixed-use development along the corridor and highlighted the need for installation of pedestrian and bicycle infrastructure as development occurs. Current zoning applicable along the corridor (Community Commercial and Heavy Commercial) does not permit housing, so the workforce housing overlay would be applied to vacant and underutilized sites in the area to facilitate the development of multifamily housing to help meet local need. Overlay sites are projected to develop at 28 du/ac, which represents 80 percent of the maximum permitted capacity and is consistent with the densities seen in recently constructed and approved projects. As described above in the Affordability Assumptions section, overlay sites that meet the criteria for lower income sites are counted toward L/VL RHNA, while sites that do not are counted toward Moderate and Above Moderate RHNA. On this basis, 850 VL/L income units, 265 Moderate, and 111 Above Moderate income units were assumed in the Downtown area, for a total of 1,226 housing units. Sites are shown on Map 3-4.

Geer Road

The Geer Road corridor extends along Geer Road, from Canal Drive up to Christoffersen Parkway. Existing development along the corridor consists of a mix of single-family and medium density residential, strip malls featuring fast-food restaurants and banks, and large vacant parcels. Current General Plan land use and zoning for the area permits High and Medium Density Residential along Geer Road and Fulkerth Road, as well as Community Commercial on Geer Road between Monte Vista Avenue and Tuolumne Road. Turlock Transit Routes 1 and 2 travel on Geer Road and provide connection to CSU Stanislaus, Turlock Transit Center, and shopping and restaurants on Countryside Drive. Existing buildings in the area are typically 1- and 2-stories in height with surface parking partially screened from view with trees and landscaping. Vacant land along the corridor with zoning that currently permits housing was accounted for above; however, there are also underutilized parcels with commercial zoning that does not currently permit housing. The size of these parcels is relatively small, ranging from 0.2 acres to approximately 5 acres.

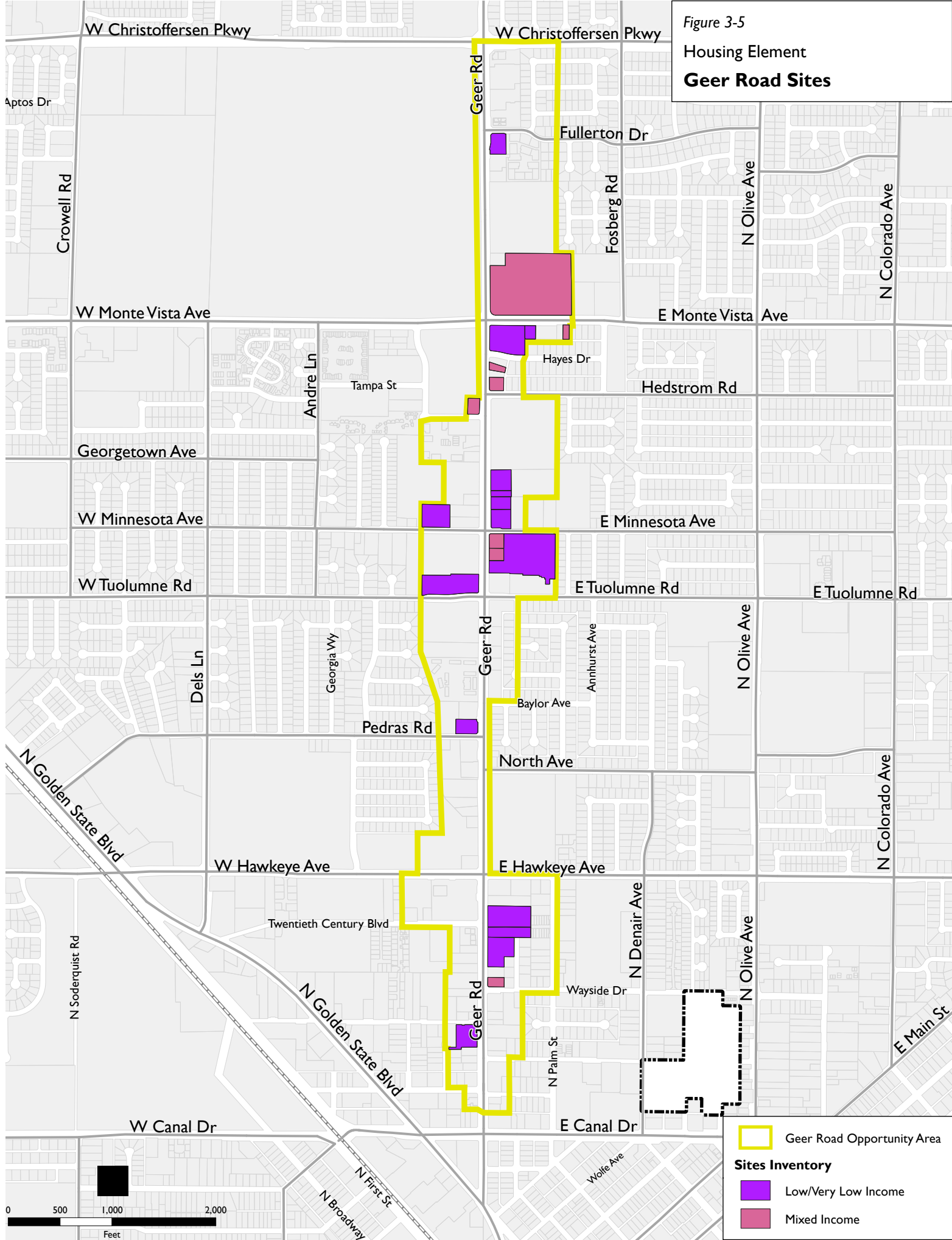
In the citywide survey, there was solid (although not unanimous) support for additional high-density housing along the corridor, including apartments, townhomes, and duplexes and triplexes (Appendix G: Community Survey Report). Accordingly, the workforce housing overlay would be applied to underutilized commercial sites to help accommodate local need. Overlay sites are projected to develop at 28 du/ac, which represents 80 percent of the maximum permitted capacity and is consistent with the densities seen in recently constructed and approved projects. As described above in the Affordability Assumptions section, overlay sites that meet the criteria for lower income sites are counted toward L/VL RHNA, while sites that do not are counted toward Moderate and Above Moderate RHNA. On this basis, 475 VL/L income units, 243 Moderate income units, and 100 Above Moderate income units were assumed in the Geer Road area, for a total of 818 housing units. Sites are shown on Map 3-6.

South Lander

The South Lander opportunity area is located south of downtown along Lander Avenue and features a range of auto-related and industrial businesses today, along with single-family housing amidst businesses. . Turlock Transit Routes 5 travels on South Golden State Road and Lander Avenue, and provide connection to Downtown, Turlock Transit Center, and shopping and restaurants in Turlock Town Center. There are a number of underused properties, including some with parking lots, that offer redevelopment potential. The size of underutilized parcels varies from 0.20 to 1.55 acres and is generally smaller than sites in other opportunity areas. Base zoning for these parcels is Community Commercial and Heavy Commercial, which does not permit housing.

In the Citywide survey, there was support for adding a mix of housing types, including apartments, townhomes, duplexes/triplexes, and garden apartments. Community comments indicated support for low-income housing in South Lander. Accordingly, the workforce housing overlay would be applied to underutilized commercial sites to help accommodate local need. Overlay sites are projected to develop at 28 du/ac, which represents 80 percent of the maximum permitted capacity and is consistent with the densities seen in recently constructed and approved projects. As described above in the Affordability Assumptions section, overlay sites that meet the criteria for lower income sites are counted toward L/VL RHNA, while sites that do not are counted toward Moderate and Above Moderate RHNA. On this basis, 196 VL/L income units, 86 Moderate income units, and 30 Above Moderate income units were assumed in South Lander area, for a total of 312 housing units. Sites are shown on Map 3-7.

Figure 3-5
 Housing Element
Geer Road Sites

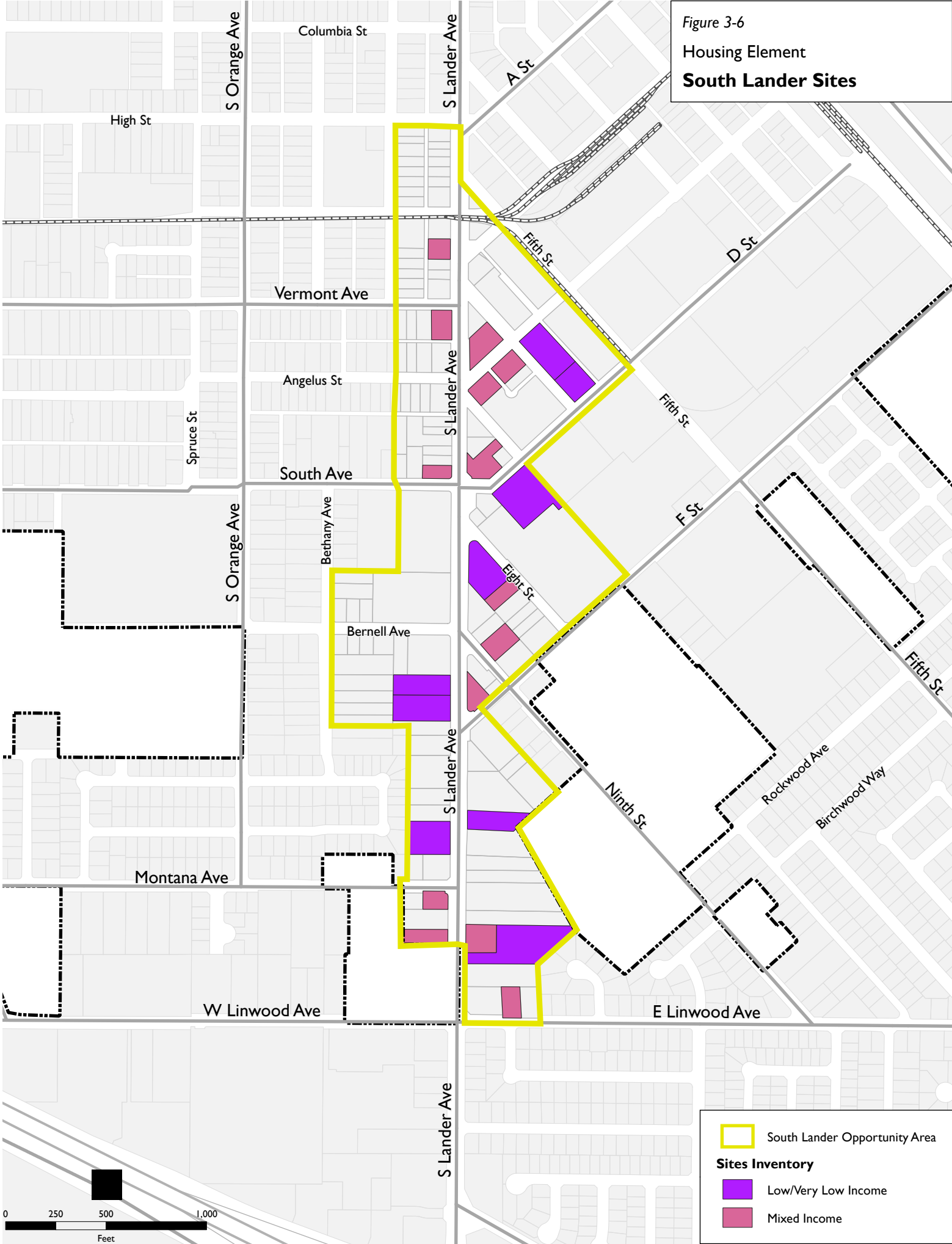


Geer Road Opportunity Area

Sites Inventory

- Low/Very Low Income
- Mixed Income

Figure 3-6
 Housing Element
South Lander Sites



- South Lander Opportunity Area
- Sites Inventory**
- Low/Very Low Income
- Mixed Income

0 250 500 1,000
 Feet

Source: City of Turlock, 2021; Dyett & Bhatia, 2021

West Main

The West Main opportunity area extends along West Main Street from North Soderquist Road to West Avenue. Today it is home to a mix of commercial, residential, and public uses including auto-related business, restaurants, neighborhood retail and services, and Osborn Elementary School. Turlock Transit Route 6 travels on West Main Street and provides connection to Osborn Elementary School, Turlock Memorial Park, and Turlock Transit Center. A number of commercial properties along this corridor have large areas of surface parking or older buildings that present opportunities for redevelopment with housing. The Community Commercial zoning district that applies to these sites does not currently permit housing. In the citywide survey, there was fair support for smaller-scale multifamily housing, such as duplexes/triplexes, garden apartments, townhomes, and 2-3 story apartments. Respondents supported development that reflects the existing character and style of the surrounding neighborhood, which includes lower building heights and tree-lined streets. Comments from survey respondents also highlighted some needs for this area, including the development of grocery stores and open space and parks. To facilitate the addition of housing in the area, the workforce housing overlay would be applied to underutilized commercial properties. Overlay sites are projected to develop at 28 du/ac, which represents 80 percent of the maximum permitted capacity and is consistent with the densities seen in recently constructed and approved projects. As described above in the Affordability Assumptions section, overlay sites that meet the criteria for lower income sites are counted toward L/VL RHNA, while sites that do not are counted toward Moderate and Above Moderate RHNA. On this basis, 23 VL/L income units, 32 Moderate income units, and 10 Above Moderate income units were assumed in the West Main area, for a total of 65 housing units. Sites are shown on Map 3-7.

SUMMARY OF RHNA CAPACITY

Table 3-5, below, summarizes the realistic capacity projected for the inventory with the proposed workforce housing overlay. It accounts for development of vacant residential land, pipeline projects, ADU production, and development on underutilized commercial sites in opportunity areas where the workforce housing overlay would apply. Per State guidance, ADUs are not assigned to individual sites, but rather projected on a citywide basis. Map 3-8 shows the inventory sites at a citywide scale.

Overall, the draft sites inventory demonstrates capacity meet RHNA obligations at all income levels with a buffer. The buffer is required to ensure that there is sufficient capacity to meet RHNA obligations at all times during the planning period, in the event that some sites on the inventory actually develop at lower densities than envisioned. HCD recommends that communities plan for a buffer of at least 10 percent for their RHNA at all income levels. Appendix A contains the full sites inventory in the format required under State law.

Approximately 60 percent of Turlock's RHNA allocation is accommodated on vacant sites, while the remaining 40 percent is accommodated on sites that are non-vacant, meaning they contain buildings or other significant improvements that are permanent and add significantly to the value of the property. Per State law, if the inventory identifies non-vacant sites to address a portion of the regional housing need allocation, analysis is required to demonstrate the viability of sites for redevelopment with housing during the planning period. This analysis is included in Appendix F.

Figure 3-7
 Housing Element
West Main Sites

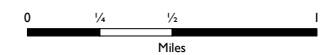
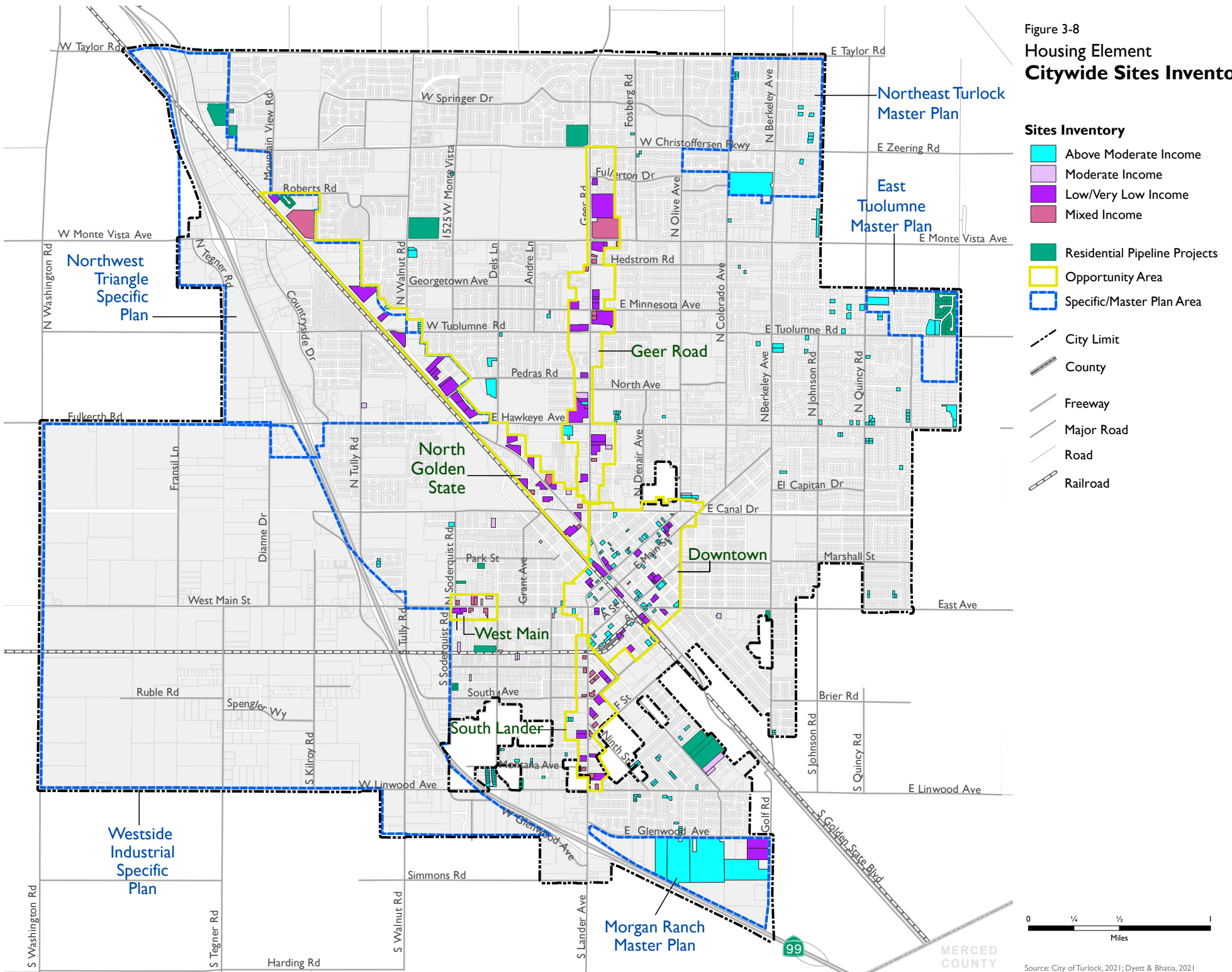


West Main Opportunity Area

Sites Inventory

- Above Moderate Income
- Moderate
- Low/Very Low Income
- Mixed Income

Figure 3-8
**Housing Element
 Citywide Sites Inventory**



Source: City of Turlock, 2021; Dyett & Bhatia, 2021

Map Date:
 9/20/2024

MERCED COUNTY

Table 3-5: Summary of RHNA Capacity

| <i>Location/Strategy</i> | <i>Very Low and Low</i> | <i>Moderate</i> | <i>Above Moderate</i> | <i>Total</i> |
|--|-------------------------|-----------------|-----------------------|--------------|
| Units Accommodated Under Current Zoning | | | | |
| Pipeline Projects | 6 | 361 | 770 | 1,137 |
| Morgan Ranch Master Plan | 450 | | 875 | 1,325 |
| Downtown | 329 | | 277 | 606 |
| ADUs | 48 | 24 | 8 | 80 |
| Vacant Residential Land | 393 | 133 | 576 | 1,102 |
| Subtotal (A) | 1,226 | 518 | 2,506 | 4,250 |
| RHNA | 2,208 | 1,096 | 2,498 | 5,802 |
| % RHNA | 56% | 47% | 100% | 73% |
| Rezoning | | | | |
| North Golden State | 850 | 265 | 111 | 1,226 |
| Geer Road | 475 | 243 | 100 | 818 |
| South Lander | 196 | 86 | 30 | 312 |
| West Main | 23 | 32 | 10 | 65 |
| Subtotal (B) | 1,544 | 626 | 251 | 2,421 |
| GRAND TOTAL (A+B) | 2,770 | 1,144 | 2,757 | 6,671 |
| RHNA | 2,208 | 1,096 | 2,498 | 5,802 |
| % RHNA | 125% | 104% | 110% | 115% |

ADDITIONAL LAND RESOURCES AVAILABLE FOR HOUSING

Other lands with capacity for housing in the City of Turlock include properties owned by religious institutions and residentially zoned land that meets the eligibility criteria for Senate Bill 9 (SB9). This land is not included on the inventory of available housing sites because, as described above, with the proposed workforce housing overlay, there is sufficient capacity to meet RHNA obligations at all levels. However, much of this land is located in the north and the east of Turlock in areas identified by the State as High or Highest Resource areas where the existing housing stock is predominantly low density single-family homes. By promoting a wider range of housing types affordable to different income demographics, the City can help affirmatively further fair housing, consistent with requirements in State law. Programs have been included in Chapter 4 Housing Action Plan to address this.

Places of Workshop and Housing

New State laws recognize religious institutions as important partners in affordable housing development and seek to provide incentives to facilitate construction by churches, synagogues, and mosques, such as through the reduced parking requirements available to religious facilities seeking to develop affordable housing on their properties by way of AB 1851. Examples of faith-based affordable housing projects include the Grove Church Tiny Homes Project in Riverside which was completed in 2018 and the Mulberry Village Tiny Homes project in Riverside completed in 2022.

There are at least 34 religiously owned properties in Turlock with vacant land and/or surface parking lots that could be developed with affordable housing, as shown on Figure 3-9. The City can conduct outreach to the local faith-based community to understand if there is interest in pursuing affordable housing projects on properties they own and gain an understanding of what the City could do to support housing development by faith-based property owners. On the basis of this outreach, a refined list of candidate properties will be developed together with specific actions the City could take to facilitate the development of affordable housing by interested faith-based institutions, which could include zoning amendments to permit residential development at densities of at least 20 du/ac, permit streamlining procedures, and technical assistance. Program 1-F in Chapter 4 Housing Action Plan envisions the creation of a Congregational Overlay and associated development standards, as well as implementation of a program of technical assistance and development support for interested faith-based institutional property owners, which may include the preparation of factsheets; introductions to qualified design professionals, construction contractors, property management firms, and affordable housing operators; consultations on navigating the development application process.

Senate Bill 9 Housing

Senate Bill 9 (SB9), also called the California Housing Opportunity and More Efficiency (“HOME”) Act, is a California state law that enables homeowners to split their single-family residential lot into two separate lots and/or build additional residential units on their property without the need for discretionary review or public hearing. The law gives qualifying property owners the right to a maximum total of four units across the two lots, whether as single-family dwellings, duplexes, and/or ADUs. In Turlock, there are over 190 single-family zoned properties that meet the eligibility criteria and that may be good candidates for SB9 housing development (based on A/V ratio) if the owners choose to pursue that option. Smaller scale housing on these properties, shown on Figure 3-10, could provide Moderate income households with additional opportunities for homeownership and/or rental units affordable to Moderate and Lower income households. Through Program 1-C in the Action Plan, the City will enact regulations to facilitate SB9 housing for interested homeowners in Turlock, and to promote SB9 housing through community outreach activities, including providing informational handouts at the planning counter, posting information on the City website, raising awareness through email newsletters, and providing information at City events.

Figure 3-9
Housing Element
Religious Properties with
Potential for Housing

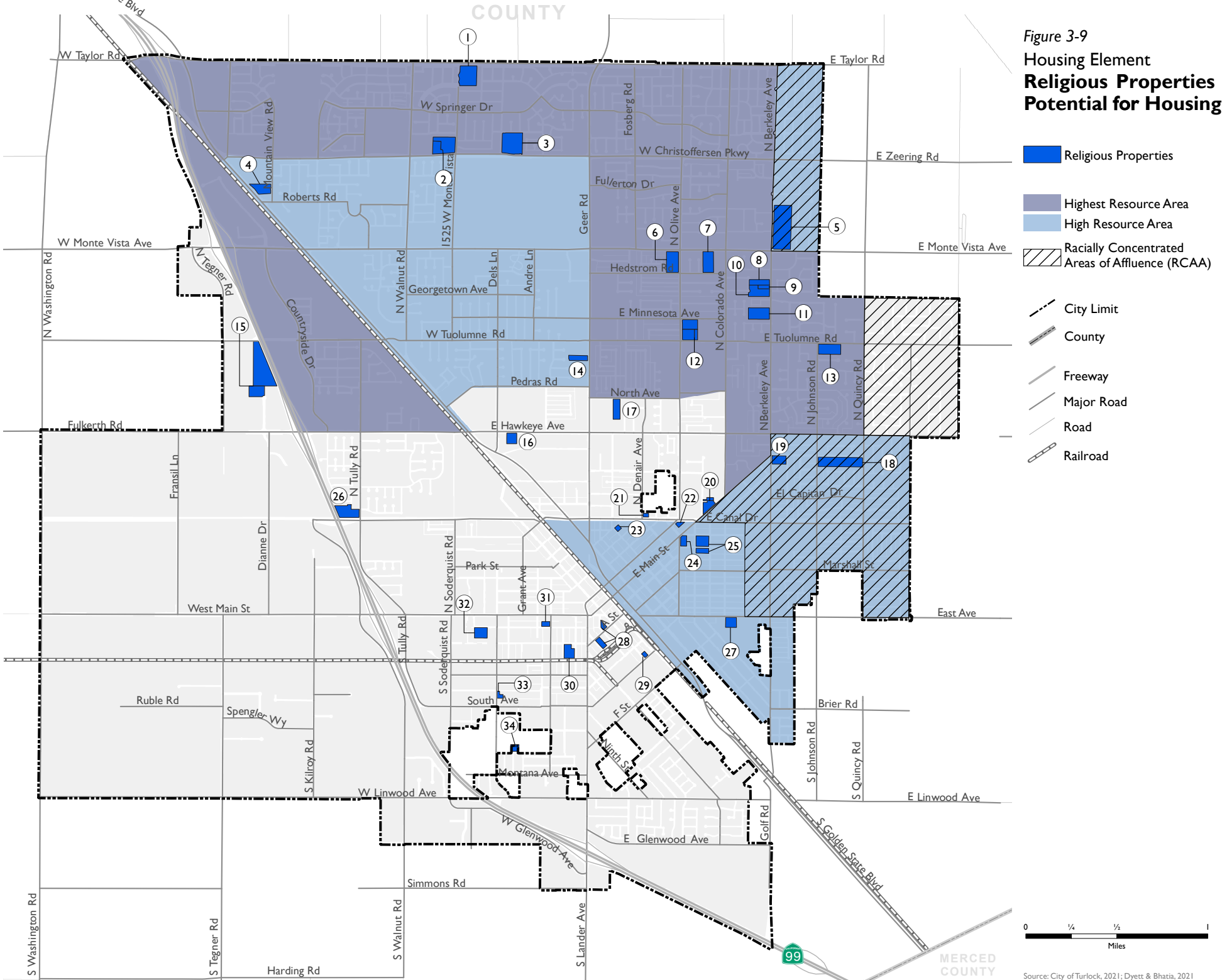
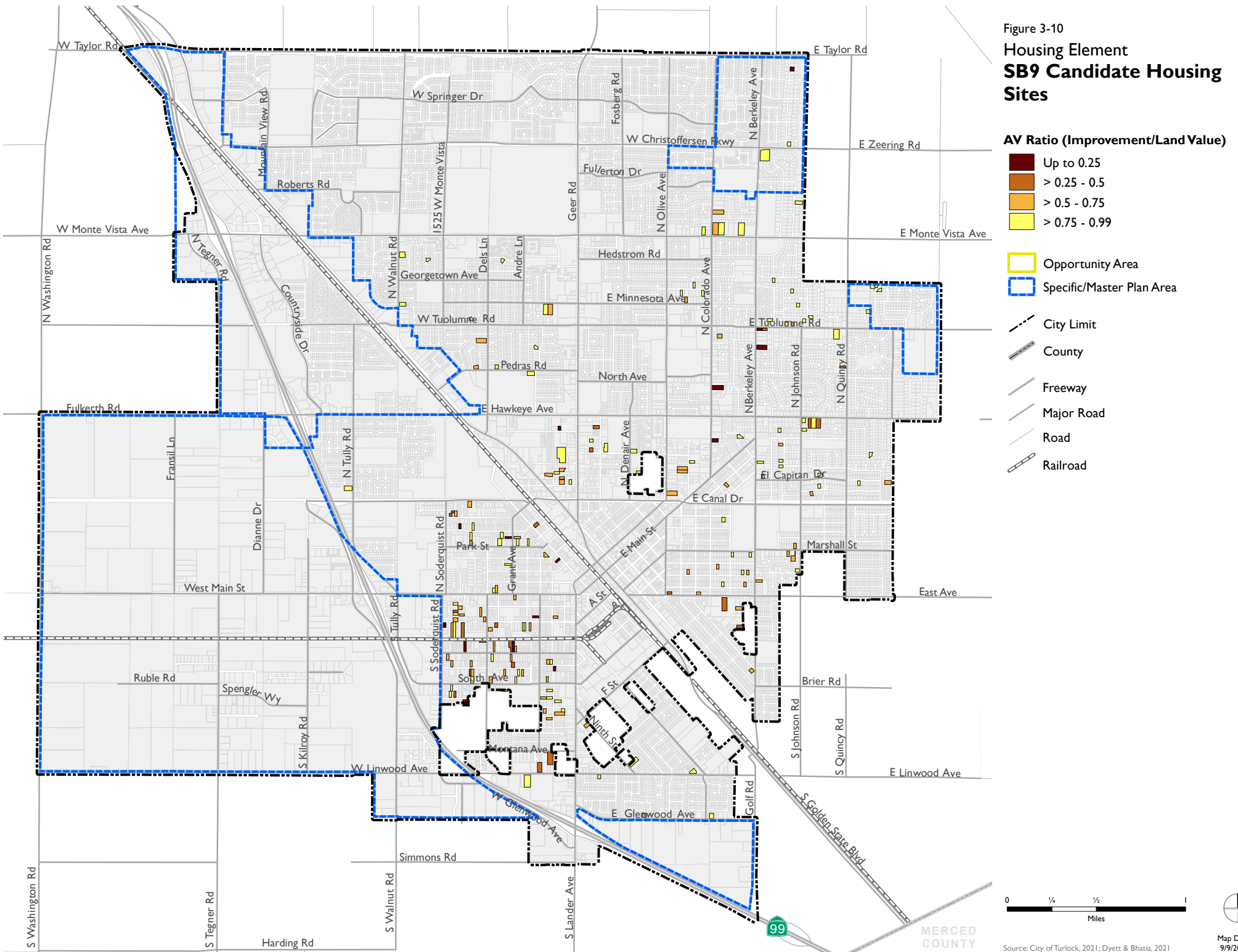


Figure 3-10
Housing Element
SB9 Candidate Housing
Sites

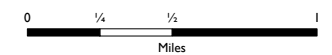


AV Ratio (Improvement/Land Value)

- Up to 0.25
- > 0.25 - 0.5
- > 0.5 - 0.75
- > 0.75 - 0.99

- Opportunity Area
- Specific/Master Plan Area

- City Limit
- County
- Freeway
- Major Road
- Road
- Railroad



Financial Resources

As a small community, and especially since the loss of Redevelopment Agencies statewide, Turlock has limited availability of funds for affordable housing activities. The primary sources of funding and financing are federal and State programs, which the City's Housing Program Services Division leverages to provide local programs and services. Through these funding sources, the City creates and maintains affordable housing for lower and moderate income households.

FEDERAL

Community Development Block Grant (CDBG) Funds

Through the CDBG program, United States Department of Housing and Urban Development (HUD) provides funds to local governments for a range of community development activities. The eligible activities include, but are not limited to, acquisition and/or disposition of real estate property, public facilities and improvements, relocation, rehabilitation and construction (under certain limitations) of housing, home ownership assistance, and also clearance activities. In addition, these funds can be used to acquire or subsidize at-risk units. The City of Turlock typically receives approximately \$650,000 annually, for a five-year total of \$3,250,000 from the U. S. Department of Housing and Urban Development (HUD).

HOME Investment Partnerships Program (HOME)

The HOME program provides Federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including building acquisition, new construction and reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance. HOME funds are available to Turlock/Stanislaus County HOME Consortium, which includes Stanislaus Urban County and the City of Turlock. Since the 2023-2024 fiscal year, Stanislaus County leads the HOME Consortium, while the City of Turlock is a partner. The HOME Consortium has been awarded an additional estimated \$1.2 million in annual HOME funds, for a five-year total of \$6,000,000.

STATE

Permanent Local Housing Allocation

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State's housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which establishes a \$75 recording fee on real estate documents to increase the supply of affordable homes in California. Because the number of real estate transactions recorded in each county will vary from year to year, the revenues collected will fluctuate.

The first year of SB 2 funds are available as planning grants to local jurisdictions. For the second year and onward, 70 percent of the funding will be allocated to local governments for affordable housing purposes and will be distributed using the same formula used to allocate federal CDBG. This funding is known as the Permanent Local Housing Allocation (PLHA) and can be used to:

- Increase the supply of housing for households at or below 60 percent of AMI

- Increase assistance to affordable owner-occupied workforce housing
- Assist persons experiencing or at risk of homelessness
- Facilitate housing affordability, particularly for lower and moderate income households
- Promote projects and programs to meet the local government's unmet share of RHNA
- A Housing Element certified by the State HCD is a prerequisite for receiving PLHA fund

Public Financing

The State Housing and Community Development Agency, and HUD, offer construction, rehabilitation, and permanent financing as low as three percent to qualified applicants such as housing authorities or private non-profit developers. These funds are competed for based on participation of other funding sources and local need.

No Place Like Home Program

The No Place Like Home program provides loans to eligible counties to acquire, design, construct, rehabilitate, and/or preserve permanent supportive housing for persons who are experiencing homelessness or chronic homelessness, or who are at risk of chronic homelessness, and who need mental health services. The No Place Like Home Program has the potential to aid affordable housing projects around the State and in Turlock, though a challenge includes how to finance projects.

LOCAL

First Time Home Buyers Program

The City's Turlock First Time Home Buyers (FTHB) Program helps eligible applicants purchase a home with down payment assistance of up to \$50,000 or 40 percent (whichever is less) of the sales price of a home. These funds are made possible through federal and State programs.

Housing Rehabilitation Loan

The City of Turlock's Rehabilitation Loan Program helps homeowners and investors preserve and upgrade their homes with a low interest loan. The following areas can be repaired with loan funds: electrical, plumbing, roofing, broken windows, foundation, pest control, interior/exterior paint, floor coverings, fencing, bathroom & kitchen remodel. City of Turlock staff can assist with application forms, on-site survey of property; determination of repairs needed, bids from qualified contractors, and overview of construction process. These funds are made possible through federal and State programs

Public Service Grants

The Housing Program Services Division provides annual funding to nonprofit organizations through a competitive application process, allocating federal funding available through the CDBG Program. Nonprofits apply for funding to assist individual proposed public service activities in Turlock. A variety of activities are assisted, including teen mother services, free food for the low income, cold weather shelter homeless services, gang prevention services at the local elementary schools and high school.

Administrative Resources

The City of Turlock's Housing Program Services Division creates, maintains and sustains affordable housing opportunities in the community, primarily for persons of low and moderate income, as well as other at risk or vulnerable populations such as the elderly, disabled and the homeless. The Division seeks out grants and other opportunities to develop, rehabilitate or provide loans for the production of low- and moderate-income housing in our community. Specifically, this production of affordable housing units is achieved by assisting families in rehabilitating their homes or rental units through low interest loans, providing down payment assistance to First Time Home Buyers as well as developing new housing units through community collaborations. Through the CDBG program, the Division also provides assistance for public improvements such as curbs, gutters and sidewalks in low-to-moderate income neighborhoods, public service programs for eligible non-profits and agencies, which provide services to individuals who are low-to-moderate income and fair housing services. The Housing Program Services Division administers the following programs locally:

Fair Housing

The Housing Program Services Division offers fair housing resources and contracts with nonprofit organizations to provide services to support fair housing in Turlock. The City of Turlock contracts with Project Sentinel, a fair housing agency which investigates housing discrimination complaints, helps people with disabilities overcome barriers to housing, and provides information and counseling on fair housing and landlord/tenant law. The Division also offers fair housing information from HUD as well.

Foreclosure Resources

The Housing Program Services Division details various resources and organizations that can aid residents about foreclosure. The City's website lists California Housing Finance Agency brochures and videos, ClearPoint Credit Counseling Solutions, a HUD-approved housing counseling agency that offers foreclosure prevention and intervention, as well as other resources that homeowners can call if they feel in danger of facing foreclosure.

Community Resources

The City of Turlock Housing Program Services Division has collected programs and services in the Community Resource Handbook, which includes organizations, websites, hotlines, and services supporting the community. The Community Resource Handbook outlines resources for children and youth services, financial information and assistance, foreclosure information, home repair, senior services, shelter and homeless services, military and veterans resources, among others. The Community Resource Handbook is available on the City's website and at all City Departments at City Hall.

PUBLIC AGENCIES AND NONPROFIT ORGANIZATIONS

Additionally, a variety of public and non-profit agencies serve as resources in the implementation of housing activities in Turlock, as described below. These agencies play an important role in meeting the housing needs of the City. In particular, they are critical in the providing resources for various special needs groups in the community.

Center for Human Services

Center for Human Services is a nonprofit organization serving youth and families in Stanislaus County. CHS serves over 20,000 clients a year through programs in the areas of shelter, juvenile justice services, mental health counseling, school-based services, family resource centers, and substance abuse prevention and treatment. Specifically, CHS offers housing programs with longer-term support (up to two years) to help 18–24-year-olds develop independent living skills and work toward permanent housing.

Family Promise

Family Promise is a national nonprofit that mobilizes communities to help homeless and low-income families achieve lasting independence. Family Promise of Modesto focuses on three main areas of support, making an impact and difference on the homeless community, which include shelter, hospitality, and housing stability. Family Promise operates an Interfaith Hospitality Network, which gives opportunity for people from many faiths and backgrounds to provide shelter, meals and hope to local families in need. Additionally, all adults sheltering with Family Promise agree to participate in intensive case management services. This program helps parents connect to resources they need for education, childcare and job search. New Beginnings, the financial education program, teaches money management concepts and accountability.

Habitat for Humanity

Habitat for Humanity is a community service organization that renovates and builds homes with the goal of eliminating poverty and providing decent shelter for all. Through volunteer labor and tax-deductible donations of money and materials, Habitat for Humanity constructs or rehabilitates homes in partnership with the families that will become the owners of the properties. Rehabilitated or newly constructed homes are sold to the families for the cost of materials through a mortgage that does not include interest or profit. Habitat for Humanity Merced & Stanislaus Counties is actively working with jurisdictions to find and acquire appropriate properties for residential development and redevelopment.

HAVEN/Women's Center of Stanislaus

Healthy Alternatives to Violent Environments (HAVEN)/ Women's Center of Stanislaus is the only dedicated, comprehensive provider of supportive services and advocacy for survivors of domestic violence, sexual assault and human trafficking, regardless of age or gender, in Stanislaus County. The Women's Center provides comprehensive services, including an emergency shelter and serves 2,250 individuals annually. Services provided include support groups for domestic violence and sexual assault, case management services to explore resources available to improve safety, and confidential shelter services for women, men, and children. There is a Turlock office of HAVEN located at 301 Starr Avenue.

Legacy Health Endowment

Legacy Health Endowment (LHE) provides funding and technical support to create healthcare solutions and facilitate improved wellness within Stanislaus and Merced Counties. LHE's role is to assist public/private efforts to create solutions that prevent catastrophic healthcare consequences, as well as serve as a catalyst to improve access to and the quality of healthcare for those who are part of the greater LHE Community. LHE's mission is to improve the health and healthcare of all residents residing within Stanislaus and Merced Counties by increasing access to various healthcare services and educating people about healthy lifestyle decision.

Prodigal Sons and Daughters

Prodigal Sons and Daughters is a faith-based nonprofit organization that offers free services to those affected by addiction and those in the community in need. Services include one-on-one counseling that supports clients to change self-defeating behaviors/habits and management of emotions, grief and trauma support, community connections support for daily living, life skills courses, and learning groups of all topics. Prodigal Sons and Daughters is located in Turlock and available to all families in the Central Valley.

Project Sentinel and Stanislaus County Mediation Center

Project Sentinel is a government-supported fair housing agency dedicated to promoting and developing fairness and equality of opportunity for all people. The program covers Turlock, Modesto, and Stanislaus County residents. They can mediate Landlord/Tenant disputes with the owner or manager, inform the owner or manager of the law, refer you to a state or federal enforcement agency or to a fair housing attorney for legal assistance and are a HUD approved mortgage counseling agency. There is no charge for any of these services.

Stanislaus Community System of Care

The Stanislaus Community System of Care (CSoC) is the regional Continuum of Care (CoC). A CoC is an integrated system of care that guides and tracks homeless individuals and families through a comprehensive array of housing and services designed to prevent and end homelessness. The Stanislaus CSoC provides a variety of resources and support to persons experiencing homelessness and leads homelessness prevention efforts in Stanislaus County.

Stanislaus County Affordable Housing Corporation

Stanislaus County Affordable Housing Corp (STANCO) is a nonprofit organization that promotes the construction and development of affordable housing opportunities for the residents of Stanislaus County, California. STANCO originally organized for the purpose of acquiring land or existing housing and converting the use to affordable housing. Since 1991, STANCO has served Modesto and Stanislaus County by providing or managing over 200 affordable units of housing for families and shared individuals.

STANCO provides transitional and permanent supportive housing to persons with mental health disabilities, as well as owns and operates housing units at rents below market rates for persons who meet certain income eligibility as required by various governmental regulatory agreements. Recently, STANCO has contracted with governmental agencies and other nonprofits to provide property management services for shelter and affordable housing units for those entities.

Stanislaus County Department of Aging & Veterans Services

Stanislaus County Department of Aging and Veterans Services' mission is to help seniors and veterans obtain services and benefits they need to live secure, healthy, independent lives. Senior and Caregiver Programs provided by the department include In-Home Services, Senior Housing Assistance, Meals on Wheels, and Emergency Financial. The department offers a Senior Information Line where seniors may call for more details and assistance in finding housing. In addition, the Office of Veteran Services within the department can assist veterans with compensation for service-related disabilities, home loan benefits (application for certificate of eligibility and program information), and medical benefits.

Stanislaus Homeless Alliance

Stanislaus Homeless Alliance (SHA) is a collaborative entity formed to align homelessness services, planning, and funding among stakeholders in Stanislaus County. The Stanislaus Homeless Alliance consists of community leaders working to end homelessness. SHA promotes alignment and coordination of homeless services funding in Stanislaus County. SHA consists of one primary voting member and one alternate member from each of the following entities: Stanislaus County, City of Modesto, City of Turlock, City of Ceres, West County City, Focus on Prevention Stewardship Council, CSOC Leadership Council, and the Housing Authority of Stanislaus County. SHA brings stakeholders and residents together to identify needs, service gaps, and potential solutions and partnerships to address housing and homelessness needs within the region.

Stanislaus Regional Housing Authority

The Housing Choice Voucher program is a rental assistance program that helps very low-income families to live in market-rate housing units rather than public housing, and is administered by the Stanislaus Regional Housing Authority. Households are provided with vouchers that are paid to private market-rate landlords, who are then reimbursed by HUD. SRHA programs include the federal Housing Choice voucher program (formerly known as Section 8 rental assistance program), Conventional Low Rent program, Farm labor program, Migrant Farm labor program, and Conant Place Senior Community located in Modesto, available to seniors in Stanislaus County.

SRHA also administered the Emergency Rental Assistance Program (ERAP) in 2021, distributing emergency rental funds to support people experiencing financial distress as a result of the COVID-19 pandemic. During Direct Federal Allocation (Phase 1) of ERAP, Turlock received a total funding of \$2,189,177, while during State Allocation (Phase 2) of ERAP, Turlock received a total funding of \$2,610,895. Eligible households applied through Web Portal, where SRHA then assigned each household to a credit union. Credit unions worked with eligible households on the rental assistance applications. The SRHA then finalized eligibility and distributed funds to landlords and utility companies on behalf of households, as needed.²

Turlock Gospel Mission

Turlock Gospel Mission works to end homelessness through the restoration of relationships with God, family and the community. Turlock Gospel Mission offers three meals per day, Monday – Friday, emergency overnight shelter for women and their children, a Women’s Restoration Program, and the region’s only Day Shelter offering a multitude of services including case management, transportation, and shelter from inclement weather.

United Way of Stanislaus County

United Way is a non-profit organization that aims to help families achieve financial stability by providing support and resources for early care and education, affordable housing, and asset building. United Way also runs Stanislaus County’s 2-1-1 program, a free service that connects callers and texters with information about critical health and human services available to them. 2-1-1 has a range of housing related referral services, including housing expense assistance, emergency housing and services for homeless individuals

² Stanislaus Homeless Alliance, 2021. Available: https://csocstan.com/wp-content/uploads/2021/06/2021-03.10_FINAL_SHA_Presentation.pdf

and families, affordable housing options, landlord/tenant assistance, and connection to housing stability services, such as legal services.

We Care Program

We Care Program (WCP)'s mission is to provide transitional and emergency shelter, day center resources, and in collaboration with other agencies, support services to assist homeless individuals in becoming self-sufficient. The WCP provides shelter services for 49 homeless men a night. These individuals fall at or below 80 percent of the area median income and are ineligible for assistance from any other social service agency. WCP also offers a permanent supportive housing program for individuals who are chronically homeless and offer case management and support to clients. WCP also offers a rapid re-housing program for homeless families or individuals to create a plan for long-term housing, offering help with security deposits, first month's rent and utility deposit to enable them to move into new housing.

In addition, WCP partners with City of Turlock, with funding being provided through the City of Turlock's HOME Investment Partnership Program and CDBG Program. The Affordable Housing Program consists of a four-unit apartment complex and two houses, all managed by Landlords Property Management, which are providing long term affordable housing options to families with low income who are in need in Turlock.

4 Housing Action Plan

The Housing Action Plan describes the specific goals, policies, and programs the City will undertake to achieve the long-term housing objectives set forth in the Turlock Housing Element. These goals, policies, and programs are intended to provide a framework for increasing the range of housing options in the community, removing barriers and constraints to housing construction, ensuring the continued maintenance of existing housing, and providing equal access to housing opportunities and services for all who live and work in Turlock.

The City's housing policies and implementing programs are organized around six key goals that correspond to community priorities. Quantified and qualitative objectives are described under each program. Assumptions are based on past program performance, development trends, land availability, realistic capacity, and future program funding.

Goal I: Increase Housing Supply in Turlock and Promote a Balance of Housing Types and Prices to Meet the Needs of Local Residents

- | | |
|-------------------|--|
| Policy I-1 | Maintain sufficient land designated and appropriately zoned for housing to achieve a complementary mix of single-family and multi-family development to accommodate RHNA allocations at all levels throughout the planning period. |
| Policy I-2 | Promote development of a variety of housing types, sizes, and densities that meet community needs based on the suitability of the land, including the availability of infrastructure, the provision of adequate services and recognition of environmental constraints. |
| Policy I-3 | Continue to encourage the provision of a variety of housing choices and types in the community, including innovative forms of housing. |
| Policy I-4 | Continue to partner with and support non-profit and for-profit organizations in their efforts to construct, acquire, and improve housing to accommodate households with lower and moderate incomes. Participation of non-profit and for-profit developers in an advisory role when implementing housing programs is desirable to help understand the needs and opportunities in the community. |
| Policy I-5 | Provide technical assistance to developers, non-profit organizations, or qualified private sector interests in the application and development of affordable housing projects for federal and local financing. |
| Policy I-6 | Seek federal and state financial assistance to facilitate the provision of necessary public improvements, including, but not limited to water, sewer, storm drainage, and transportation infrastructure benefiting new residential development. |

Policy I-7 Continue to allow manufactured housing units in single-family detached areas to provide a mix of affordable and moderate-income homes.

Policy I-8 Support California State University Stanislaus (CSUS) and/or private developers building rental housing for students, and support mixed use and multifamily projects close to the CSUS campus.

Programs

Program I-A **Inventory of Available Sites.** Maintain and publish an inventory of properties available for residential development on the City's website, updating it at regular intervals.

Responsibility: Development Services Department

Timeframe: Publish inventory by January 2025; updates to be made quarterly throughout the planning period.

Objective: At least 5,802 new housing units, consistent with RHNA obligations

Funding: General Fund (staff time)

Program I-B **Workforce Housing Overlay.** California Assembly Bill (AB 2011) of 2022 provides a streamlined ministerial approval pathway for multifamily projects on commercially zoned land that pay prevailing wages for construction work and meet specified affordable housing targets. The City will adopt Zoning Code amendments in the form of a Workforce Housing Overlay District, to implement these provisions and provide an alternative to AB2011 as a means of promoting the construction of housing for teachers, nurses, firefighters, police officers, restaurant and services workers, and others employed in Turlock. The overlay will apply to vacant and underutilized parcels in the North Golden State, Geer Road, West Main, and South Lander Opportunity Areas shown on Map 3-8, providing property owners with the option to redevelop their land with housing or mixed use projects should they elect to do so. The workforce housing overlay will permit multifamily housing development at between 20 and 35 dwelling units per acre and will:

- Allow for mixed use development and 100 percent residential buildings on commercial properties within the overlay, with at least 50 percent of the floor area in a mixed use development required to be for residential uses;
- Establish an “by right” maximum base density of 20 dwelling units per acre;
- Provide a ministerial approval process for developments in which at least 20 percent of the units are affordable to lower income households during the planning period, consistent with Government Code 65583.2 (h) and (i); and
- Incorporate objective design and development standards to accommodate higher density development and ensure appropriate buffering of adjacent residential land uses.

Responsibility: Development Services Department

Timeframe: Adopt the Workforce Housing Overlay by January 31, 2025
Objective: 626 moderate and 1,544 lower income RHNA units by 2030
Funding: REAP grant

Program I-C

SB 9 Housing Ordinance. SB 9 is a State law that allows division of lots in single-family residential districts to facilitate the development of smaller scale housing that may be more affordable in existing neighborhoods. The new requirements, which are codified in Government Code sections 65852.21.21 and 66411.7, require ministerial approval of a housing development with no more than two primary units in a single-family zone or subdivision of a parcel in a single-family zone into two parcels subject to compliance with objective development standards and requirements in the State law. This program commits the City to enacting regulations to comply with SB 9 and facilitating SB9 housing for interested homeowners in Turlock, and to promoting SB9 housing through community outreach activities, including providing informational handouts at the planning counter, posting information on the City website, raising awareness through email newsletters, and providing information at City events. Promotional activities will target homeowners in High and Highest Resource Areas (Map D-12) to diversify the range of housing types and affordability in these locations, and in areas of high segregation and poverty (Map D-8) to increase opportunities for homeownership in these locations.

Responsibility: Development Services Department
Timeframe: Adopt the SB 9 Ordinance by Q1 2026; conduct community outreach bi-annually following adoption of the ordinance, with annual progress reporting to HCD through APRs
Objective: Increase opportunities for homeownership, diversify the range of housing types in Turlock, and expand housing choices and affordability in single-family neighborhoods
Funding: General fund (staff time)

Program I-D

Small Lot Subdivision Ordinance. A small lot subdivision is a project that constructs several free-standing single-family houses or duplexes on lots that are smaller than conventional single-family lots. Unlike apartments, which are rented, or condominiums, which come with costly condo board fees and assessments, the houses in a small lot subdivision are owned fee simple, meaning that each unit is owned individually. Common areas like driveways or open space are typically governed by a simple maintenance agreement rather than a costly and bureaucratic homeowners association. By reducing lot size (while still providing separation from neighboring homes) and by avoiding condo fees, small lot subdivisions make home ownership more affordable. Under current zoning in Turlock, minimum lot size ranges from 4,500 square feet in the R-L4.5 zone to 14,500 square feet in the R-E zone. Through this program, the City will identify appropriate locations for small lot subdivisions and adopt an ordinance to facilitate their development as part of a strategy to increase the supply of entry level homes and expand options for homeownership. The ordinance should preclude small lot subdivisions if they do not result in an increase in housing

supply relative to the number of existing units on the site in order to prevent the displacement of existing rental units.

Responsibility: Development Services Department

Timeframe: Adopt the ordinance by Q1 2028

Objective: Increase the supply of entry level homes and expand options for homeownership in Turlock

Funding: General Fund

Program I-E

ADU/JADU Awareness. Since 2023, the City has made seven different fully engineered and pre-approved ADU plan sets developed by a local architectural firm available for interested homeowners to streamline and simplify process of building an ADU. As a next step, the City will initiate a program to raise awareness of options and benefits for homeowners, with the objective of promoting the development of ADUs and JADUs in Turlock. The program will include the following elements:

- Citywide email blasts and newsletter articles advertising incentives and resources available to interested homeowners;
- Preparation of an ADU/JADU application checklist and informational handouts on cost-saving building materials and construction techniques;
- Pop up presence at events around City to raise awareness and answer questions;
- Community seminars providing advice and information to interested homeowners.

Responsibility: Development Services Department

Timeframe: Prepare informational materials and launch program by end of Q1 2025 with updates via Annual Progress Report to HCD

Objectives: Outreach, including newsletters, pop ups, and seminars, will be conducted bi-annually following program inception with the aim of issuing 15 ADU/JADU construction permits annually over the planning period

Funding: General Fund (staff time)

Program I-F

Congregational Overlay. The faith-based community can play an important role in providing affordable housing in Turlock. The City has identified 33 sites owned by religious institutions with potential for redevelopment over the planning period should the owners wish to pursue that option (see Map 3-12). Current zoning for most of the properties permits housing development; however, cost and familiarity with the development process can be barriers to development even where supportive zoning is already in place. Therefore, to facilitate production of affordable housing projects on properties owned by religious institutions, the City will:

- Adopt a congregational overlay and associated objective development standards that permits residential development at up to 24 dwelling units per acre by-right

(consistent with Government Code section 65583.2 (h) and (i)) on properties owned by religious institutions where affordable housing is proposed;

- Provide a program of technical assistance and development support to faith-based organizations wishing to pursue affordable housing developments on their properties. This may include the preparation of factsheets; introductions to qualified design professionals, construction contractors, property management firms, and affordable housing operators; consultations on navigating the development application process;
- Proactively conduct outreach to faith-based organizations in Turlock to raise awareness of programs and incentives available to them for affordable housing development. This may include mailers, phone calls, meetings, and publication of information on the City's website.

Responsibility: Development Services Department

Timeframe: (a) Adopt the overlay by Q4 2026; (b) institute program of technical assistance/support in April of year following rezoning; (c) ongoing with regular reporting annually by April of each year thereafter via Annual Progress Report to HCD

Objective: Increase the supply of affordable housing in Turlock, with a focus on High and Highest Resource neighborhoods

Funding: General Fund

Goal 2: Remove or Reduce Constraints to Housing Production

Policy 2-1 Periodically review and revise City development standards to facilitate quality housing that is affordable to all income demographics.

Policy 2-2 Monitor all regulations, ordinances, departmental processing procedures and fees related to the rehabilitation and/or construction of dwelling units to assess their impact on housing costs.

Policy 2-3 Ensure that water and sewer providers are aware of the City's intentions for residential development throughout the City.

Programs

Program 2-A **Predevelopment Consultation.** Continue to offer regularly scheduled predevelopment meetings to developers with a proposed project where developers have an opportunity to meet with various City staff representing numerous City departments (i.e. planning, building, housing, economic development, engineering, fire, etc.) to discuss project design, City standards, necessary public improvements, and funding strategies. At the predevelopment meeting, educate applicants about the City’s mechanisms for incorporating affordable units in new residential development projects, such as using density bonuses or including ADU/JADUs. Continue offering a “pre-development tip sheet” to project proponents.

Responsibility: Development Services Department

Timeframe: Beginning Q1 2024 and throughout the planning period

Objective: At least 5,802 new housing units by 2031

Funding: General Fund (staff time)

Program 2-B **Objective Standards for Multifamily and Mixed Use Development.** Turlock is one of 254 jurisdictions in California that has not made sufficient progress toward its Above Moderate and Lower Income RHNA. Accordingly, pursuant to SB423, the City must offer a Streamlined Ministerial Approval Process for housing developments that propose to make at least 10 percent of their units affordable to lower income households. Additionally, the City requires discretionary permits (Minor Discretionary Permits (MDP) or Conditional Use Permits (CUP)) for most multifamily, group homes, and group quarters, and findings the existing ordinance requires for action on both MDPs and CUPs are subjective and, therefore, inconsistent with the requirements of State law, which mandate objective standards for review of residential projects. Through this program, the City will adopt objective standards to meet the requirements of SB 35 and bring the ordinance into compliance with other provisions of the Housing Accountability Act. The City will also prepare application checklist forms that staff can use to quickly determine whether projects are eligible for expedited processing.

Responsibility: Development Services Department

Timeframe: Prepare objective standards by end of Q4 2024; adopt by end of Q1 2025

Objectives: Compliance with State law

Funding: REAP funds

Program 2-C **Design Review.** Design review of multifamily projects is conducted at the staff level in Turlock with reference to applicable master/specific plan standards and the City's design guidelines, which have not been codified. Through this program, the City will review the design guidelines, translate guidelines into objective standards, and adopt or incorporate into the zoning code.

Responsibility: Development Services Department

- Timeframe:** Prepare objective standards by end of Q4 2025; adopt by end of Q2 2026
- Objectives:** Facilitate development of 2,208 multifamily units by 2031
- Funding:** General fund and grant funding

Program 2-D

Morgan Ranch Sewer Lift Station. The Morgan Ranch Master Plan, adopted in 2015, envisions construction of 1,325 new homes in the southern part of Turlock, including 875 single-family homes and 450 multifamily homes. While the City has been in communication with interested developers in the years since adoption, no housing has yet been constructed. A key barrier to development has been the cost of sanitary sewer improvements needed to ensure adequate sanitary sewer facilities to serve future development in the Master Plan area, including a new lift station and new sewer mains. Development fees adopted with the master plan were intended to fund these improvements; however, to assist with the financial feasibility of master plan development, the City will construct a sewer lift station consisting of two pumps with capacity of 1.2 million gallons per day at the Golf Road / Glenwood Avenue intersection in the eastern part of the master plan area.

- Responsibility:** Public Works
- Timeframe:** Complete construction by end of Q4 2025
- Objectives:** Facilitate development of 1,325 new homes by 2031
- Funding:** CFF funds

Program 2-E

By Right Rezoning of Sites from Prior Inventories. Several sites on the inventory were also included on prior Housing Element inventories (see Map 4-1). As these sites are also anticipated to accommodate lower income RHNA during the 2023-31 planning period, the City will create a zoning provision to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower income households.

- Responsibility:** Development Services
- Timeframe:** Complete rezoning by Q1 2025
- Objective:** 2,208 lower income RHNA units by 2031
- Funding:** REAP funds

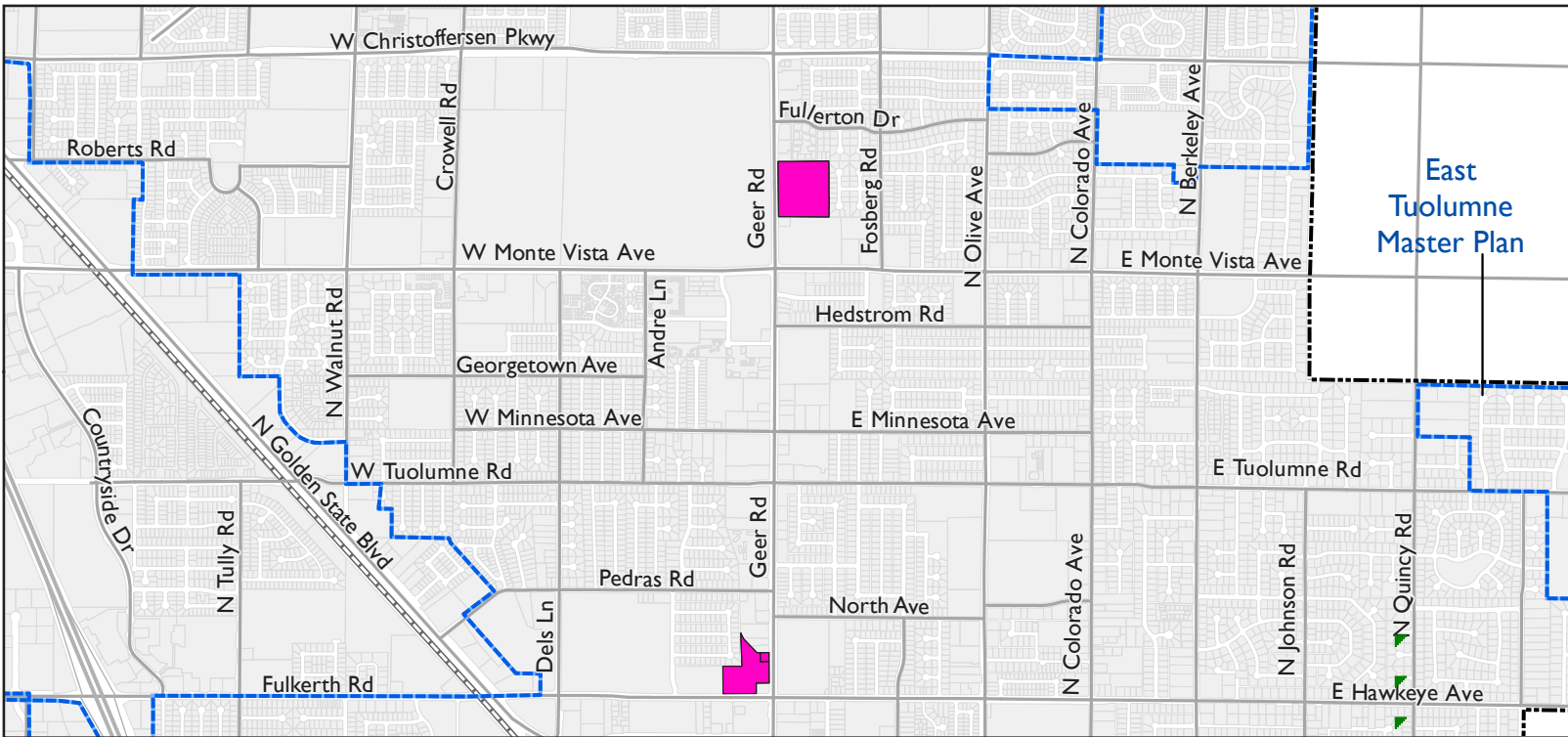
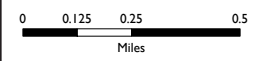
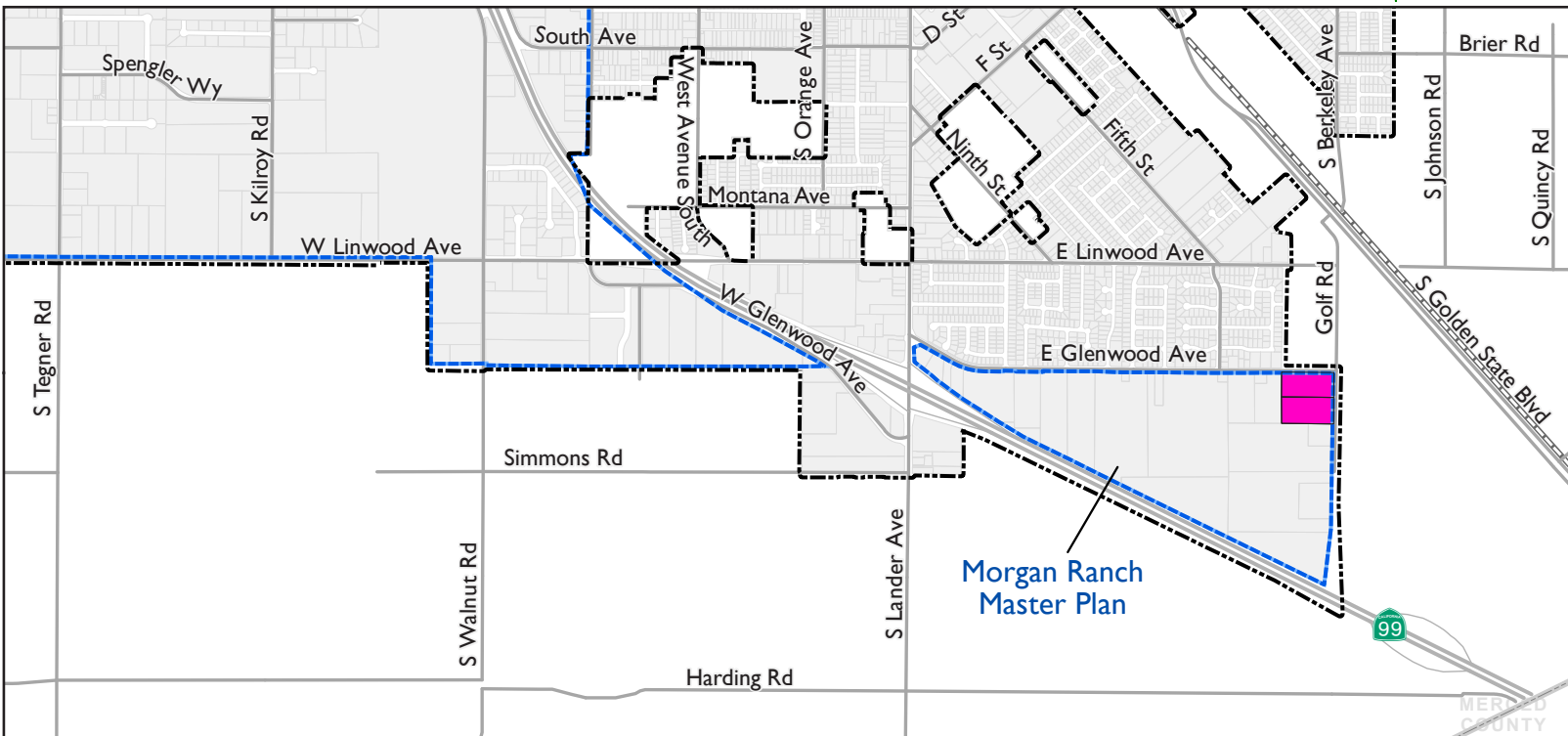


Figure 4-1
**Housing Element
 Rezoning to Allow
 Developments by Right**

- Vacant sites included in two or more prior inventories
- Specific/Master Plan Area
- City Limit
- County
- Freeway
- Major Road
- Railroad

Parcels

| |
|-----------------|
| 044-025-007-000 |
| 044-025-006-000 |
| 072-046-001-000 |
| 071-015-017-000 |
| 071-015-013-000 |



Program 2-F **Live-Work Units.** The Zoning Code includes provisions for home-based work in all residential units and for artist’ studios in the downtown area that allow a place of residence for the artist as a secondary use subject to a Minor Discretionary Permit. The Code does not, however, provide for live-work units for workers other than artists. Through this program, the City will identify areas appropriate for live-work uses (such as along North Golden State, South Lander, and Geer in proximity to downtown) and revise the Zoning Code to establish provisions for live-work units other professions and vocations beyond artists who want to live and work in the same space. These provisions would treat live-work development as a commercial use with incidental residential subject to conditions intended to protect other uses both within and adjacent to the live-work unit.

Responsibility: Development Services Department
Timeframe: Complete rezoning by Q1 2025
Objective: Facilitate permits for 110 live-work units by 2031
Funding: REAP funds

Program 2-G **Manufactured Housing.** The Turlock Zoning Ordinance defines “manufactured housing” as single-family detached housing built to federal standards and allows such housing in all districts where residential uses are permitted, subject to a Minor Discretionary Permit in the R-M district and a CUP in the R-H district. Manufactured housing is also subject to architectural review. However, requiring a discretionary permit for a manufactured housing unit on a lot where stick-built units are permitted by right conflicts with State law. Further, Government Code Section 65852.3 limits architectural requirements imposed on a manufactured home structure to its roof overhang, roofing material, and siding material. Through this program, the City will revise the zoning ordinance to make manufactured housing subject to the same requirements applicable to stick-built units in the same district and amend the Code to allow small residential structures on a mobile base (“tiny homes”) to be treated as a type of ADU.

Responsibility: Development Services Department
Timeframe: Complete rezoning by Q1 2025
Objective: Compliance with State requirements
Funding: REAP funds

Program 2-H **Zoning for People with Disabilities.** Approximately 12 percent of the population in Turlock has a disability, which is comparable to the share of the population of Stanislaus County as a whole. Through this program, the City will amend the zoning ordinance to remove obstacles to providing housing for people with disabilities in Turlock. Amendments will include:

- Revising definitions to incorporate and define the term to refer to “household” and define the term as “one or more persons living together as a single housekeeping unit in a dwelling unit who live together and share household activities and

responsibilities and activities, which may include sharing expenses, chores, and eating meals together;”

- Including definitions or use classifications for residential care, supportive housing, and transitional housing that classify all accommodations for persons with disabilities as a residential use and cross-reference State law; and
- Establishing use regulations and development standards applicable to housing for persons with disabilities based on the development type.

Responsibility: Development Services
Timeframe: Complete rezoning by Q1 2025
Objectives: Compliance with State requirements
Funding: REAP funds

Program 2-I

Low-Barrier Navigation Centers. Government Code Section 65660 requires municipalities to allow a Low Barrier Navigation Center (LBNC) to be permitted by right in mixed-use districts and nonresidential zones that permit multifamily development. LBNC means a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. If the City receives applications for these uses, it must process them ministerially as required by State law. The City will amend the Zoning Ordinance to:

- Revise the Use Classification Descriptions to identify LBNCs as a type of emergency shelter and define them as "A housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.
- Allowing LBNCs as a by-right use in all zones where mixed-use development is permitted and in all nonresidential zones where multifamily uses are permitted.
- Establish standards applicable to LBNCs that incorporate best practices to entry

Responsibility: Development Services
Timeframe: Complete rezoning by Q1 2025
Objective: Compliance with State requirements
Funding: REAP funds

Program 2-J

Transitional and Supportive Housing. Transitional housing acts as a bridge between a crisis shelter and permanent housing, providing temporary housing while residents develop more independent living skills and stability. Supportive housing offers permanent, stable living situations for those in need of a continuum of care plan, such as treatment for adult clients with serious mental illness and co-occurring disorders.

The Zoning Ordinance will be revised to comply with State law regarding the treatment of transitional and supportive housing facilities. Changes will include:

- Amending the zoning code to define single-room occupancy (SRO) units as a residential use and establish appropriate standards;
- Allowing SRO development in new and renovated mixed-use buildings and in exclusively residential buildings in CL, CH, and CC zones;
- Revising the zoning code to allow transitional and supportive housing serving seven or more persons subject to the same restrictions applicable to residential development of the same type in the same district and to distinguish transitional and supportive housing uses being established in an existing structure from a new development including these use types.

Responsibility: Development Services
Timeframe: Complete rezoning by Q1 2025
Objective: Compliance with State requirements
Funding: REAP funds

Program 2-K

Expand Online Transparency. Government Code section 65940.1 requires cities and counties to provide transparency in publicizing land use controls and fees. The Planning Office website provides links to a variety of resources as well as links to downloadable versions of Land Use Plans, Regulations, and Studies. The City must also continue to ensure that the on-line version of the City Code is regularly updated and that revisions to review procedures are available on-line as well as in handouts at the Planning counter. This program commits the City to ensuring these requirements are met and to addressing the recently enacted regulations in Government Code section 65913.3 requiring cities to compile lists specifying information applicants must provide to obtain post-entitlement phase permits.

Responsibility: Development Services Department
Timeframe: Complete rezoning by Q1 2025
Objective: Compliance with State requirements
Funding: REAP funds

Program 2-L

Water and Sewer Priority. Consistent with AB 1087 (Government Code Section 65589.7), the City will provide a copy of the adopted Housing Element to water and sewer providers upon finalization of the document and will work with water and sewer providers to adopt written policies and procedures that grant priority for service allocations to proposed developments that include housing units affordable to lower income households.

Responsibility: Development Services Department
Timeframe: Complete rezoning by Q1 2025
Objective: Compliance with State requirements

Funding: REAP funds

Goal 3: Preserve, Rehabilitate, and Enhance Existing Housing and Neighborhoods

- Policy 3-1** Work to preserve property values, correct housing deficiencies, bring substandard units into compliance with City codes, and improve overall housing conditions in Turlock.
- Policy 3-2** Promote regular property maintenance, emphasizing the importance to long term housing quality.
- Policy 3-3** Encourage compatible design of new residential units to help integrate new housing types into established neighborhoods.
- Policy 3-4** Encourage the use of building placement, design, and construction techniques that promote energy conservation, including green building practices, the use of recycled materials, and the recycling of construction and demolition debris.
- Policy 3-5** Continue working with Stanislaus County on developing and implementing a strategy to incorporate County islands and upgrade infrastructure. This will likely include a combination of directing shared property taxes towards constructing improvements, and drafting a minimal standards agreement for County upgrades.

Programs

Program 3-A Home Rehabilitation Loan Program. The City runs a Rehabilitation Loan Program that helps homeowners and investors preserve and upgrade their homes with a low interest loan. The program is open to homeowners in Turlock who earn less than 80 percent of the Stanislaus County median income, have good credit, and demonstrate the ability to repay the loan while maintaining affordable rent. No down payment is required for participation. The City will undertake the following efforts to increase participation, with specific targeting to residential neighborhoods in DACs:

- Translating the program handout into Spanish and posting on the City website;
- Actively promote participation with public awareness efforts, including mention in citywide email blasts/newsletters; bilingual (EN/ES) fliers in utility mailers; promoting participation and public contact events such as Neighborhood Night Out;
- Amend the program to allow loans to be made available to renter households, subject to financial eligibility and owner approval.

Responsibility: Housing Program Services

Timeframe: Beginning Q1 2024, with reporting via annual action plan

Objectives: Provide 10 loans annually throughout the planning period

Funding: CDBG and HOME funds

Program 3-B Acquisition and Rehabilitation of Property for Affordable Housing. In collaboration with other HOME Consortium members, continue to acquire, rehabilitate, and sell or operate real property and covenants for affordable housing in Turlock. Prioritize housing for households whose incomes are 50 percent of AMI or below, with the

remainder available to households making less than 120 percent AMI. Work through a master contractor to rehabilitate the homes to simplify the process, achieve economies of scale, and enable the funding to cover more properties. Properties may be transferred to non-profit agencies to provide property management services.

Responsibility: Housing Program Services
Timeframe: Beginning Q1 2024, with reporting via annual action plan
Objectives: Provide 14 loans annually throughout the planning period
Funding: CDBG and HOME funds

Program 3-C **Neighborhood Clean Up Programs.** Neighborhood beautification is a priority for Turlock and the City operates a number of community clean up programs to encourage residents to clean up their property and their community. A review of code enforcement actions since 2021 indicates that weed abatement, debris removal, and inoperative motor vehicle abatement are the most common issues. No clear pattern of geographic concentration is evident. In the 2023-31 planning period, the City will continue to operate the following programs promoting the availability with information on the City's website:

- Embrace Turlock's Beauty Day, offering free waste pick up and disposal to Turlock Utility customers citywide;
- Residential recycling, offering a blue cart for commingled (non-sorted) recyclables and a green cart for organic and garden material through a contract with Turlock Scavenger for the collection and disposal of solid waste;
- Leaf Pick Up Day, offering twice annual pick up of leaves and garden waste in all neighborhoods;
- Motor Vehicle Abatement, to keep the streets clear of abandoned motor vehicles by towing vehicles after adequate notice is given to the registered owner; and
- Stanislaus County Household Hazardous Waste Program, accepting household hazardous waste at the County facility at 1710 Morgan Road, Modesto.

Responsibility: Municipal Services Department
Timeframe: At least annually throughout the planning period
Objectives: Enhance neighborhood character and reduce code enforcement actions
Funding: General Fund

Program 3-D **First Time Homebuyers Program Refinements.** Turlock's First Time Home Buyers Program (FTHB) helps eligible applicants purchase a home with down payment assistance of up to \$50,000 or 40 percent (whichever is less) of the sales price of a home. The program is open to households making less than 80 percent of the Stanislaus County AMI who have completed First Time Home Buyer counseling course, have good credit, and qualify for a new current market rate first mortgage. The FTHB program has been in operation for 20 years and there are currently 100 active loans in the portfolio; however, participation rates have decreased in the last two years due to

market conditions and prevailing interest rates. To expand opportunities for homeownership in Turlock, the City will benchmark the FTHB program against programs offered by other cities with similar income-to-finance ratios and identify refinements, such as increasing the allowable debt-to-income ratio for applicants or adjusting the back end ratio, that could be made.

- Responsibility:** Housing Program Services
- Timeframe:** (a) complete benchmarking and identify recommended refinements by end of Q4 2025; (b) amend FTHB program to incorporate recommendations by end of Q2 2026
- Objectives:** Increase participation in FTHB program
- Funding:** General fund (staff time)

Program 3-E

Place-Based Community Improvement Efforts. The City is dedicated to improving the quality of life in Turlock's DACs and low income neighborhoods through infrastructure investments and the provision of programs for residents, including:

- Construction of the Columbia Pool, support buildings, restrooms, and site improvements to serve neighborhoods in southwest Turlock (completion of construction by end of Q4 2025);
- Repavement and rehabilitation of various street segments (Columbia, Lane, S. Beach, S. Laurel, Farr, Olive, Angelus, S. Orange, Bernell) in the southwest quadrant of Turlock and installation of ADA-compliant access ramps (completion of construction by end of Q4 2026);
- Re-surfacing and re-striping of the multi-purpose court at Columbia Park (completion of construction by end of Q4 2027);
- Recreational programming, including fitness programs, family events, community traditions, arts, social and educational activities, and a wide range of enrichment classes with scholarships available for participation (annually throughout the planning period); and
- Healthy Alternatives to Violent Environments (HAVEN), a program that provides housing resources and services, financial literacy training, and safety planning to low- and moderate-income victims of domestic violence (annually throughout the planning period).

- Responsibility:** Municipal Services Department
- Timeframe:** Timing as noted above
- Objectives:** Improve quality of life in DACs and low income neighborhoods
- Funding:** A, Measure L, CDBG

Program 3-F

Home Energy and Water Conservation. Continue to promote energy and water conservation in new and existing homes by:

- Supplying bilingual (EN/ES) energy conservation awareness brochures (“100 Ways to Go Green”) in all public meeting places and online;

- Publicizing the availability of State and Turlock Irrigation District energy conservation and renewable energy programs for housing construction and rehabilitation by providing information on the City website and in City newsletters and mailers;
- Periodically updating the "pre-development tip sheet" with information on available energy and water conservation programs; and
- Including a discussion of available programs in predevelopment meetings

Responsibility: Municipal Services

Timeframe: (a) supply brochures and publicize available programs starting Q1 2025, (b) update tipsheet by end of Q2 2025

Objectives: Promote energy and water conservation in new development

Funding: General fund (staff time)

Program 3-G

Community Land Trust Collaboration. A Community Land Trust (CLT) is a nonprofit organization made up of community residents and public representatives that purchases land to serve local community needs, such as by building and managing housing for low- and moderate-income households. Because they own the land, CLTs can provide a range of affordable homeownership opportunities and housing options for generations. The City will explore a collaboration or partnership with the San Joaquin Valley Community Ownership Project to facilitate the establishment of a CLT in Turlock. The San Joaquin Valley Community Ownership Project offers workshops, technical assistance, and networking services to support the establishment of CLTs community-owned agricultural initiatives. Through this collaboration, the City may contribute meeting space, property, funds, or technical expertise. In particular, efforts should focus on opportunities to acquire rehabilitated housing and land in the southwest of Turlock and in low and moderate income areas for a CLT.

Responsibility: Development Services Department

Timeframe: Target to offer one workshop by end of Q2 2026 and annually thereafter throughout the planning period

Objectives: Promote establishment of a CLT in an LMI neighborhood by 2031

Funding: General fund

Program 3-H

Anti-Displacement Strategy. According to data from the Urban Displacement Project at the University of California, residents in three Census tracts in Turlock are at risk of displacement. These tracts, shown on Map D-17, have a high concentration of low and moderate income households and one of them is also designated as an area of High Segregation and Poverty. Additionally, senior renters on fixed incomes and other low income households throughout Turlock are at risk of displacement if housing prices continue to rise. Through this program, the City will prepare an anti-displacement strategy with the following components to help prevent displacement of vulnerable residents:

- Preserve Subsidized Affordable Units: Create partnerships with the Stanislaus Regional Housing Authority to support acquisition of affordable units at-risk of conversion to market rate; identify a code enforcement specialist on staff to provide technical assistance and information to property owners of lower income units to address code enforcement issues; seek funding to support rehabilitation of substandard multi-family units; and restrict conversion of existing units occupied by lower-income households to short term rentals.
- Protect Current Residents: Provide a link on the City’s website to the Stanislaus Regional Housing Authority’s list of Section 8 rental units; partner with Project Sentinel and nonprofits that serve underserved residents within the City to share information on fair housing and tenant rights.
- Awareness and Marketing: In partnership with Project Sentinel, develop an engagement strategy to disseminate information on tenant rights and protections (e.g., source of income, and State rent stabilization and just cause eviction regulations).

Responsibility: Housing Program Services
Timeframe: Prepare anti-displacement strategy by end of Q4 2025, begin implementation in Q1 2026
Objectives: Minimize or prevent displacement of at-risk residents
Funding: CDBG and HOME funds

Goal 4: Provide a Range of Housing Types and Services to Meet the Needs of Individuals and Households with Special Needs

- Policy 4-1** Connect those most at risk of becoming unhoused to programs and services that will help prevent them from losing their homes.
- Policy 4-2** Increase access to a continuum of housing, including emergency shelters, transitional housing, and supportive housing, to bridge the gap from homelessness to permanent housing by offering structure, supervision, support, and life skills training.
- Policy 4-3** Continue to cooperate and coordinate with other jurisdictions and public service organizations to address the needs of the unhoused in the community.
- Policy 4-4** Provide information to low-wage employers in Turlock about various City housing programs that may benefit their employees, including the Mobile Home Rental Assistance, Home Rehabilitation Loan, and First Time Homebuyers Programs, as well as other programs providing rental and mortgage assistance.
- Policy 4-5** Maintain participation in the Housing Authority to qualify City residents for existing housing assistance and provide information on the availability of Housing Authority programs to qualified residents.

Programs

Program 4-A Housing for ELI Households and Persons with Special Needs. Recognizing that local funding capacity for affordable housing has been severely diminished by the dissolution of redevelopment agencies, the City will continue to facilitate production of affordable housing, including units targeted to extremely low income (ELI) households and persons with special needs (elderly, disabled/developmentally disabled, large households, female-headed households, the unhoused, and farmworkers), through the following efforts:

- Providing administrative assistance upon request to developers seeking available State and federal funding and/or tax credits for the construction of affordable and special needs housing;
- Using funds from the Housing Program to cover impact fee waivers or offset other project costs;
- Fast-tracking the permit process for developers who partner with non-profits to create affordable and special needs housing units;
- Expanding the existing fee deferral program for developers who commit to providing affordable and special needs housing;
- Granting modifications to development standards and/or providing financial incentives consistent with City regulations and State law to developers who commit to providing affordable and special needs housing.

For housing projects greater than 10 units in size with all units affordable to Low- Very Low- and Extremely Low-Income households, target 10 percent of the units as affordable to Extremely Low-Income households.

Responsibility: Housing Program Services
Timeframe: Beginning in Q1 2024
Objective: 130 units for ELI households and persons with special needs during the planning period
Funding: CDBG funds

Program 4-B Support for Individuals with Disabilities. Through this program, the City will partner with the Disability Resource Agency for Independence Living (DRAIL) to promote the availability of programs and services for individuals with disabilities in Turlock. An active member of the California Foundation on Independent Living Centers (CFILC) and the National Council on Independent Living (NCIL), DRAIL is a non-profit 501c3 with offices located in Modesto, Stockton and Sonora. DRAIL partners with individuals with disabilities, their families, and their support teams to increase their independence, advocate for their rights, and create fully inclusive communities. Services offered include advocacy and services for persons with disabilities, including housing referral and navigation; home modifications; and support for acquisition and use of assistive technologies. City actions may include providing information and links to DRAIL programs and services in citywide newsletters; and co-hosting informational events.

Responsibility: Development Services Department

Timeframe: Annually throughout the planning period starting Q1 2025
Objective: Increase in participation in DRAIL programs and services by Turlock residents (2023-31)
Funding: General Fund (staff time)

Program 4-C

Support for Senior Independent Living. Older adults represent a growing share of the population in Turlock, rising from 11 percent in 2000 to nearly 14 percent in 2020. As they age, older adults may need home renovations or modifications that accommodate disabilities to ensure they can continue to live independently. Many seniors also live in fixed incomes, which makes them vulnerable to displacement with rapidly rising housing costs. The City will support senior Independent living by:

- Revising the zoning ordinance to specifically allow deviations from the setback and height requirements for the purpose of providing accommodation for disabled access to an existing structure upon approval of a Minor Administrative Approval;
- Continuing to offer low-income disabled persons and seniors financial assistance to improve accessibility and safety issues in their homes, including through Housing Rehabilitation Loans for projects that address ADA compliance;
- Using federal and State funds to provide new units of supportive housing for older adults and persons with disabilities and/or to renovate housing so that it is suitable for older adults and persons with disabilities;
- Revising the zoning ordinance to require that all housing development with 20 or more units incorporate features based on the HCD Model Universal Design Local Ordinance to increase housing options for older adults and persons with disabilities.

Responsibility: Development Services Department
Timeframe: Adopt code amendments by end of Q4 2027
Objective: Promote retrofit of existing housing throughout Turlock and development of new units
Funding: General Fund

Program 4-D

Rental and Mortgage Assistance. Community Housing and Shelter Services (CHHS) provides rental assistance to low income families in Stanislaus County families who have received a 3-Day Notice to Pay Rent or Quit and need assistance in order to avoid eviction. CHHS also provides assistance to qualifying families who need assistance with mortgage payments. Through this program, the City will promote the availability of rental and mortgage assistance and connect residents in need with CHHS staff.

Responsibility: Housing Program Services
Timeframe: Beginning Q1 2025
Objective: Assist 10 household annually throughout the planning period
Funding: General Fund

Program 4-E Homelessness and Related Services. Like so many cities in California, Turlock is experiencing the challenges and impacts of homelessness. There are many factors driving homelessness, including mental health, substance abuse, lack of affordable housing, job insecurity, and medical emergencies. Cities are struggling from insufficient levels of funding, staffing, and other resources to address the complexities associated with our unhoused population. The City of Turlock views homelessness as one of the top priorities, and will continue to address homelessness by:

- Providing financial assistance to non-profit groups providing shelter for homeless individuals, including Turlock Gospel Mission, who operate an 80-bed shelter in Turlock, and We Care Program, a 49-bed shelter that serves chronically homeless men over the age of 18;
- Remaining an involved stakeholder in the Continuum of Care (CoC) and the newly formed Stanislaus Homeless Alliance (SHA), organizations that function to bring stakeholders and residents together to identify needs, service gaps, and potential solutions and partnerships to address housing and homelessness needs within the region; and
- Publishing a resource guide and a list of service providers in the Turlock area on the City website, including addresses, hours of operation and links to provider websites.

Responsibility: Housing Program Services

Timeframe: Beginning Q1 2025

Objective: To continue to address and find resolution for the unhoused over the planning period

Funding: CDBG funds

Program 4-F Mobile Home Rent Subsidies. Continue to administer the Mobile Home Rent Subsidy program, which provides assistance to eligible existing mobile homeowners who pay space rental amounts exceeding 30 percent of their income to mobile home park operators. Annual certifications are required to determine continuous eligibility. Rehabilitation grants or very low interest rate loans will be available to current residents to make minor repairs on their homes.

Responsibility: Housing Program Services

Timeframe: Annually throughout the planning period starting Q1 2025

Objective: Continue to administer the program for current mobile homeowner residents

Funding: CDBG and HOMERDA Successor Agency funds

Program 4-G Publicize Availability of Public Service Grants. Compile a list of non-profit organizations that the City has worked with in the past to establish cooperative agreements with non-profit housing corporations as a support agency to the City. Identify additional organizations that can serve the same role, and provide notice of funds available. As part of this list and extended outreach, the City shall contact

developers/providers of permanent and migrant farmworker housing to ensure that these entities are also made aware of available funding.

Responsibility: Housing Program Services
Timeframe: Annually throughout the planning period starting Q1 2025
Objective: Promote the availability of funding for non-profit service providers in Turlock
Funding: CDBG

Goal 5: Affirmatively Further Fair Access to Housing for All in Turlock

- Policy 5-1** Ensure that existing and proposed housing in Turlock is available to households regardless of ethnicity, race, family composition or source of income.
- Policy 5-2** Enforce fair housing laws and address discrimination in the building, financing, selling, or renting of housing based on race, religion, family status, national origin, disability, or other protected class.
- Policy 5-3** Work collaboratively with local non-profit, public, and private sector partners to raise awareness and achieve implementation of fair housing practices.
- Policy 5-4** Expand the range of housing types in Turlock in order to better accommodate the varied housing needs of current and future residents.

Programs

Program 5-A **Fair Housing Information.** To ensure that all households have equal opportunity to live in the City regardless of their ethnicity, race, household composition, or source of income, the City will continue to inform property owners, staff members, current residents, and those seeking housing in Turlock regarding fair housing rights and responsibilities by:

- Making information available in English and Spanish on the City website and at the housing counter about fair housing requirements, fair housing programs, and agencies where cases of suspected discrimination can be reported.
- Encouraging owners and real estate professionals to provide tenants with brochures on their rights and establish procedures for tenants to report discrimination.
- Making sure Housing Program Services staff are aware of fair housing requirements and resources in order to help them recognize and respond to possible instances of discrimination and report to the appropriate NGOs.

Responsibility: Housing Program Services
Timeframe: Prepare Spanish language materials by end of Q2 2025; refresh informational materials and post to City website by end of Q4 each year as appropriate; conduct annual staff information session in Q1 each year

Objective: Provide and regularly maintain information

Funding: General Fund and planning grants

Program 5-B

Mediation and Enforcement. Disability was the primary basis for fair housing complaints in Turlock between 2014 and 2019, accounting for more than 70 percent of all complaints. Race and familial status each accounted for approximately 12 percent of complaints. In Turlock, linguistically isolated households where adults have difficulty speaking English tend also to be concentrated in areas with the highest rates of renters, rent burdened households, and low/moderate income residents who may be at greater risk of eviction or have greater need for landlord-tenant mediation services. Through this program, the City will contract with Project Sentinel for comprehensive, bilingual fair housing services of complaint investigation, community outreach and education, problem solving and dispute resolution. Services will be provided by trained counselors who advise callers of their rights and help the parties reach resolutions, civil rights protection, rescind evictions, refunded deposits, improved code compliance, privacy rights respected, and predatory lending practices averted. Efforts will focus on persons with disabilities, female headed households, and ethnic minorities and areas with higher concentrations of linguistically isolate households (see Map 4-2) in particular, informing the community and target populations about fair housing and the respective housing rights and responsibilities and offering complaint/problem resolutions through education, conciliation and enforcement referral.

Responsibility: Housing Program Services

Timeframe: Ongoing 2023-2031; provide complaint/problem resolution services for 30 households annually by the end of each year

Objective: To assist 30 households annually throughout the planning period

Funding: CDBG Funds

Program 5-C

Anti-Discrimination and Fair Housing Training. In Stanislaus County, tenant complaints disproportionately involve small, independent landlords who may not be aware of fair housing law or their responsibilities. Through this program, the City will support Project Sentinel and the California Apartment Association (CAA) Central Valley branch in developing and conducting trainings on anti-discrimination and fair housing practices for small, independent realtors and property managers. City support may include participation in trainings or provision of meeting space.

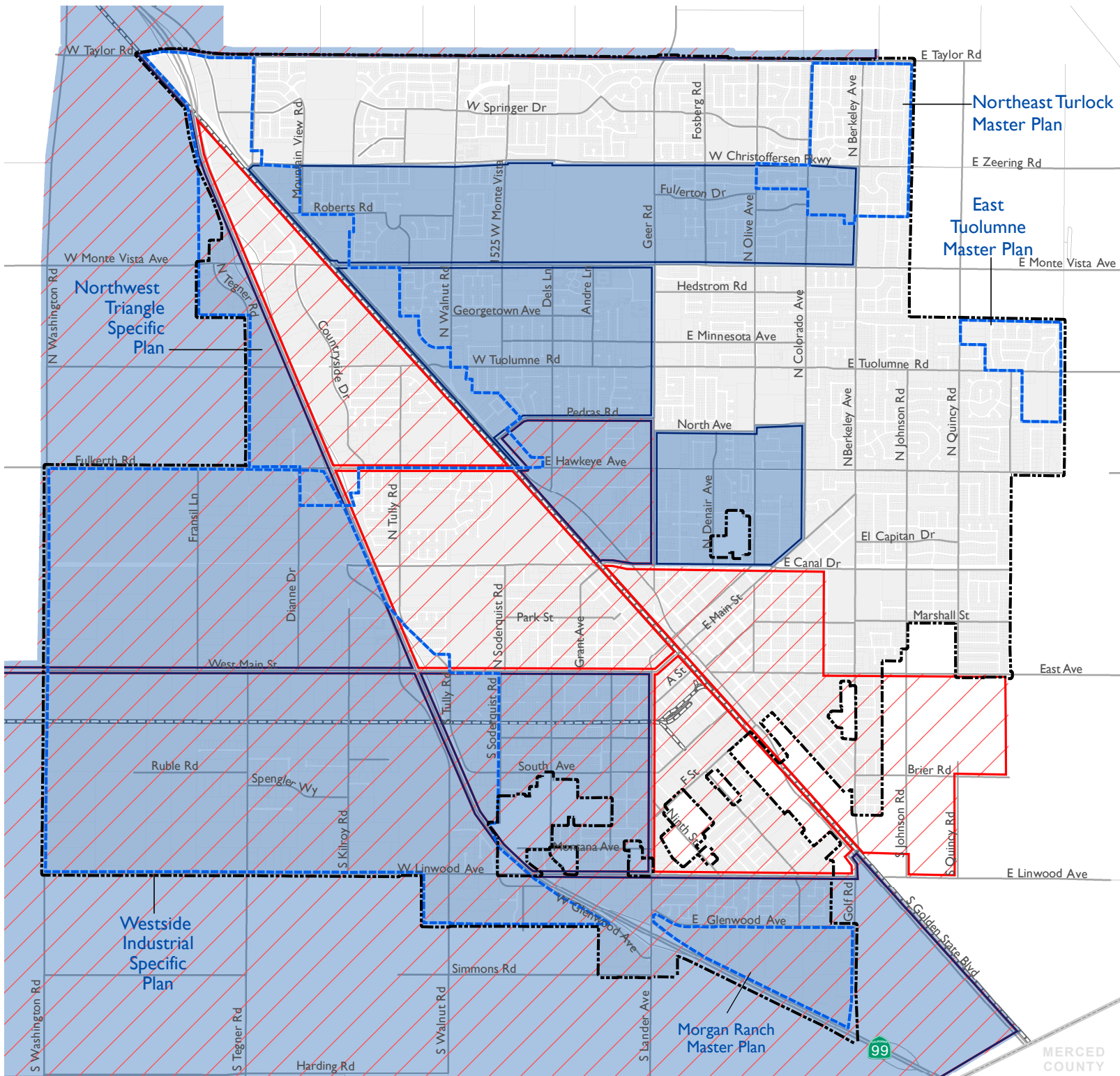
Responsibility: Housing Program Services

Timeframe: Contact partners by Q1 2025; annual coordination on support activities throughout the planning period

Objective: Increase awareness of fair housing practices among small, independent real estate professionals and lenders

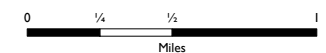
Funding: General Fund (staff time)

Figure 4-2
**Housing Element
 Concentrations of
 Linguistically Isolated
 Households in Turlock**



**Statewide Ranking by Census Tract
 Linguistic Isolation Percentile**

- Top 25%
- SB 535 Disadvantaged Community
- Specific/Master Plan Area
- City Limit
- County
- Freeway
- Major Road
- Road
- Railroad



Program 5-D Disavowal of Racially Restrictive Covenants. Stanislaus County has launched a program to let residents disavow racially restrictive covenants that might exist in the deeds of their homes. While the Supreme Court ruled such covenants were unenforceable in 1948, an unknown number of homes in the county still contain these restrictions, which effectively prevented Black, Chinese, Japanese and other racial or ethnic groups from owning or occupying homes in certain areas, effectively denying them the opportunity to accumulate generational wealth through homeownership. Although the recorded documents are never removed from the public records, modifications and amendments can be recorded to alert the public that the document is no longer valid. The City will promote participation of Turlock homeowners in this initiative at annually public contact events, in Citywide newsletters, and by posting information on the City website.

Responsibility: Housing Program Services
Timeframe: Post information to City website and send e-newsletter by end of Q3 2025; annually each year of the planning period thereafter
Objective: Participation of 100 homeowners in County program by 2031
Funding: General Fund (staff time)

Program 5-E Home Sharing and Tenant Matching. Home-sharing and tenant matching programs pair existing homeowners with renters in need of space and may also offer supportive services such as background checks, applicant interviews/screening, and facilitation of living together agreements. These programs make efficient use of existing housing stock and provide affordable rental rates without the need for new construction. Home sharing can be a particularly effective tool to support independent living for seniors and disabled residents while also increasing local housing opportunities for students and lower income earners who work or attend school in Turlock. The Senior Advocacy Network, a non-profit located in Modesto, runs the HomeShare! program that matches Home Providers (people who have a room to rent) with Home Seekers (people who are looking for a room to rent) free of charge, based on shared interests, lifestyles and needs. The City will work with Senior Advocacy Network to expand the program to Turlock, promoting participation by local homeowners by providing information via the website, City newsletters, and public contact events, referring interested parties to HomeShare! program.

Responsibility: Housing Program Services
Timeframe: Beginning in Q3 2025, (a) publish information on City website and update annually as appropriate; (b) publicize the program in City newsletters annually; (c) conduct public outreach annually
Objective: 100 home sharing matches over the planning period, with geographic targeting to homeowners in High Resource neighborhoods
Funding: General Fund and partnership with nonprofit

Program 5-F Workforce Development Initiatives. Data indicates that households with the highest rates of unemployment and the lowest rates of educational attainment are concentrated

in areas north and west of downtown in Census tracts designated by the State as Disadvantaged Communities (DACs). These areas also have the highest concentrations of female headed households, who are disproportionately low income in Turlock, where about 36 percent of households are headed by a single woman with children live below the poverty line. Through this program, the City will collaborate with Stanislaus County Workforce Development (SCWD) and non-profit groups such as America’s Job Center of California (AJCC) and Central Valley Opportunity Center (CVOC) to connect Turlock residents with workforce development programs and services. Efforts should target areas with the highest rates of unemployment and the lowest rates of educational attainment in particular. City actions will include promoting the availability of the following programs and services with links posted to the City website and posters/fliers available at community centers in Turlock:

- Job training, career counseling, job search assistance, and skills development programs offered by SCWD, CVOC, and Goodwill Industries of San Joaquin Valley;
- CalWORKs (California Work Opportunity and Responsibility to Kids), which provides temporary financial assistance, job training, and employment services to eligible low-income families, including single mothers and female heads of household;
- Dislocated Worker Programs providing career coaching, skills assessments, vocational training, and connections to employers specifically for individuals who have lost jobs, including female heads of household;
- Family Self-Sufficiency (FSS) Program, which helps low-income families receiving housing assistance to increase their income and reduce dependence on government assistance through case management, employment counseling, financial planning, and goal-setting for economic independence; and
- Project YES (Youth Employment Services), which offers job readiness training, GED preparation, and paid internships for youth (including young mothers) looking to enter the workforce.

Responsibility: Housing Program Services

Timeframe: Post materials by end of Q3 2025, updating periodically throughout the planning period; coordinate annually with SCWD and non-profit partners to track participation rates

Objective: Increase participation rate of eligible Turlock households and boost labor market participation rates in Turlock

Funding: General Fund

Goal 6: Monitor the Effectiveness of Housing Programs

Policy 6-1 Ensure that the City is meeting State requirements as well as the housing needs of current and future residents by developing and carrying out procedures for tracking progress toward achieving adopted housing goals and objectives.

Policy 6-2 The City will continue a regular monitoring and update process to assess housing needs and achievements and to provide a process for modifying policies, programs and resource allocations as needed in response to changing conditions.

Policy 6-3 Work with community groups, other jurisdictions and agencies, non-profit housing sponsors and the building and real estate industry when implementing Housing Element programs.

Policy 6-4 Provide outreach and information to the community on the availability of programs to address individual housing needs, and will actively involve the community through information, outreach, and review.

Programs

Program 6-A **Annual Review.** Assess Housing Element implementation and ensure that consistency with the General Plan is maintained through annual review by the Development Services Department and Planning Commission. Provide opportunities for public input and discussion, in conjunction with State requirements for a written review by April 1 of each year, as per Government Code Section 65400. Based on the review, establish annual work priorities for the Development Services Department and Planning Commission.

Responsibility: Housing Program Services

Timeframe: Annually by April 1 of each year

Objectives: Annual review of the Housing Element

Funding: General fund (staff time)

Program 6-B **Ensure Adequate Sites Available to Meet City's Share of RHNA.** To ensure adequate sites remain available for residential development to accommodate the City's Regional Housing Need Allocation (RHNA) for all income categories, the City shall annually review its Inventory of Available Sites to ensure the City can accommodate its share of the RHNA throughout the planning period. As development projects are considered, the City shall not take action to permit fewer units on a site than projected on the Inventory of Available Sites unless: 1) the reduction is consistent with the general plan and housing element; and 2) the remaining sites identified in the Inventory of Available Sites are adequate to accommodate the City's share of the RHNA. If the remaining sites are not adequate to accommodate the City's share of the RHNA, the City will identify (and rezone, if necessary) sufficient additional sites to meet the City's share of the RHNA.

Responsibility: Development Services Department, Planning Commission

Timeframe: Ongoing as development projects are considered

Objective: Adequate Sites Available for City Share of RHNA

Funding: General fund (staff time)

Program 6-C

ADU and JADU Trends. The City will monitor ADU and JADU permitting/construction trends and affordability in Turlock, reporting performance in its Housing Element Annual Progress Reports. If actual performance is not in line with projections in December 2027, the City will review and take action as needed to ensure compliance with "no-net loss" provisions of State law. As appropriate, corrective actions will include:

- Identifying additional regulatory, process, or financial incentives, based on property owner feedback and updating the municipal code to implement them; or
- If actual production and affordability of ADUs is far from anticipated trends, amending the housing element, identifying additional sites as needed to accommodate RHNA, rezoning within 1 year of the corrective action evaluation.

Responsibility: Development Services Department

Timeframe: (a) reporting with annual report to HCD in April 2024; annually by April of each year thereafter (b) December 2027 for corrective action evaluation (if needed) (c) end of December 2028

Objectives: Track progress toward Sixth Cycle RHNA production goals ensure compliance with State law

Funding: General Fund

Program 6-D

Development and Replacement Unit Requirements. The City will require the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site identified in the Housing Element consistent with those requirements set forth in Government Code section 65915(c)(3). Replacement requirements apply to sites identified in the inventory that currently have residential uses, or within the past five years (based on the date the application for development was submitted) have had residential uses that have been vacated or demolished, and 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; or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or
- Occupied by low or very low-income households.

Responsibility: Development Services Department

Timeframe: Beginning in Q4 2024

Objective: Protection of existing housing

Funding: General fund (staff time)

Quantified Objectives

California Government Code Section 65583[b] requires that housing elements contain quantified objectives for the maintenance, preservation, and construction of housing. The quantified objectives shown in Table 4-1 set a target goal for Turlock to strive for, based on needs, available resources, and constraints.

Table 4-1: 2023-2031 City of Turlock Quantified Objectivities

| <i>Income Category</i> | <i>New Construction¹</i> | <i>Rehabilitation²</i> | <i>Conservation/Preservation³</i> |
|----------------------------|-------------------------------------|-----------------------------------|--|
| Extremely Low ⁴ | 130 | -- | -- |
| Very-Low | 1,75 | -- | -- |
| Low | 903 | 80 | 112 |
| Moderate | 1,096 | -- | -- |
| Above Moderate | 2,498 | -- | -- |
| TOTALS | 5,802 | 80 | 112 |

1. The new construction objective is equal to Turlock's RHNA allocation.
2. Assumes assistance to 10 households annually throughout the planning period through the City's Home Rehabilitation Loan Program (Program 3-A)
3. Assumes preservation of 112 existing low income homes in Turlock with the use of HOME and CDBG funds for acquisition and rehabilitation of substandard housing (Program 3-B)
4. Stanislaus Council of Governments (StanCOG) RHNA methodology did not assign extremely low income units to jurisdictions. Based on past trends, the City targets 130 extremely low income units over the planning period, which represents 10 percent of the Very Low RHNA allocation.