



CITY OF STOCKTON

COMMUNITY DEVELOPMENT DEPARTMENT

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June 6, 2023

To all Interested Parties

Re: Public Review of the Draft 2023-2031 Housing Element

The City recently concluded its Public Review of the 6th Cycle Draft 2023-2031 Housing Element, which received three comment letters. The City staff would like to express their gratitude to all those who provided feedback and participated in various meetings related to Housing and Zoning. These workshops were instrumental in preparing the Draft Housing Element.

This letter formally responds to mutual themes expressed in the three comment letters received and corresponds to specific items in the Annotated Comment letters contained in Attachments A through C.

Revisions to the Draft Housing Element

Based on residents, stakeholders, and City staff comments, the Draft Housing Element has been revised to reflect the following summarized changes. These changes are categorized by topic and can be seen in track change form in the revised Policy Chapter in Attachment D.

- **Housing Protections:** Policies and programs have been revised to indicate the City's commitment to exploring various requirements and incentives for housing protections.
- **Housing Capacity and Affirmatively Furthering Fair Housing (AFFH) Site Analysis:** As Housing Capacity sites (a.k.a. RHNA sites) are oriented toward housing production while the other targets explicitly housing for certain groups, the City will continue to seek direction from the State on how these analyses should be implemented together. While a few housing capacity sites have been removed, staff was careful not to impact the overall housing capacity surplus as it could restrict the development options for the remaining housing sites. Furthermore, the Housing Action Plan will explore additional housing capacity options not listed in the Housing Element or required by state housing law. Those sites could include county land within the sphere of influence, underutilized infill lots, underutilized buildings within the downtown area, and potential redevelopment areas.
- **Development Code Overhaul:** Policies and Programs have been revised to highlight potential zoning code revisions to increase housing production for all incomes and groups. These revisions include the following:
 - allowing housing in more zoning designations,
 - provide more housing options,

- adding new processes for increasing development densities,
- additional infill allowances,
- new zoning overlays to provide specific standards for particular neighborhoods, and
- performance standards for new development to reduce potential impacts.
- **Housing Action Plan (HAP):** While the draft HAP has not been released, City staff is still seeking feedback from potential document users (residents, housing advocates, developers) on what should be in the document. The HAP will build from the Housing Element programs and explore additional strategies and recommendations to implement housing goals further. Areas of research include, but are not limited to:
 - development process summary for all types of housing (emergency, transitional, permanent),
 - proformas to explore funding options to reduce the cost gap in new housing construction,
 - infill development toolkit
 - list of funding and partnerships in the area for each housing need,
 - case studies on projects and redevelopment areas, and
 - detailed recommendations for specific topics and projects covered in the HAP.
- **Additional Outreach:** Between Fall 2022 and Spring 2023, City staff sent thousands of mailed notices to owners, dozens of notices to the Record and email group, hosted over fifteen Shape Stockton workshops, conducted dozens of interviews with stakeholders and held numerous meetings with residents and stakeholders. City staff will work with local and regional partners to explore additional opportunities for feedback before hearings for adoptions begin. These opportunities could include but are not limited to, the following:
 - Conduct follow-up interviews with all stakeholders contacted and interviewed.
 - Provide bilingual notices to local community organizations (schools, event centers, religious facilities, etc.) and attend meetings and gatherings where appropriate.
 - Continue to attend “Go-to-them-Events” when time allows. Past events are listed on the Shape Stockton website at [Community Participation - City of Stockton \(stocktongov.com\)](https://www.stockton.gov/community-participation).
 - Additional notifications in English and Spanish within local magazines and informational flyers.
 - Coordinate with Community groups and representatives to explore additional contacts and neighborhoods to reach out to.
 - Translate additional workshop materials into Spanish.
 - Create videos in English and Spanish summarizing all housing efforts with information on how to get involved.

A summary of all comments received for the Shape Stockton effort can be viewed on the Shape Stockton website at [Shape Stockton - City of Stockton \(stocktongov.com\)](https://www.stockton.gov/shape-stockton). Shape Stockton consists of grant-funded efforts that include updates to the City’s Development Code and Design Guidelines, required Housing Element Update, permit software improvements, and Housing and Neighborhood Action Plans. Housing-related comments from these efforts can be found in Attachment E.

Next Steps

Moving forward, the City staff will conduct the following.

- Upload the revised Draft Housing Element and comment letters to the City's website.
- Submit the revised Draft Housing Element to the California Department of Housing and Community Development for them to begin their State required compliance review.
- Conduct follow-up interviews with stakeholders to see what else is needed and what other groups/residents should be contacted.
- Continue outreach on the Draft Housing Element and Housing Action Plan consistent with the feedback from the stakeholder interviews and the options included in this letter.

Again, City staff would like to thank everyone who contributed to Draft Housing Element and Shape Stockton efforts. While much work remains, City staff appreciates the feedback received and looks forward to working with the community to address housing in the City of Stockton.

If you have any questions regarding the information in this letter, contact me by phone at 209 937-8598 or by e-mail at matt.diaz@stocktonca.gov.



Matt Diaz, AICP
Advanced Planning Manager

Attachments

- A. Annotated St. Mary's Dining Room Comment Letter dated May 12, 2023
- B. Annotated Stockton Housing Justice Coalition Comment Letter dated May 12, 2023
- C. Annotated Disability Rights California (DRC) Comment Letter dated May 15, 2023
- D. Revised Housing Element Policy Chapter with Track Changes
- E. Shape Stockton Housing and Neighborhood Comments



May 12, 2023

Input on the Draft Housing Element

Dear City of Stockton,

Thank you for the work that the Shape Stockton team has done in developing the first draft of the Housing Element. They have been very open to input and encouraging community participation. I appreciate this opportunity to provide our feedback as well.

St. Mary's is one of the largest homeless service agencies in Stockton, serving over 5,000 individuals a year. We provide meals, showers, clothing and social services to homeless individuals who are staying in the shelters, residing in the encampments, or living in their cars. We also serve households from the surrounding low-income neighborhoods who are very low income and at risk of homelessness. For our clients, the lack of housing to fit their needs is extremely detrimental.

The main component that I feel is missing from the Housing Element is a housing plan for extremely low income households. It is a sub-category of the larger group titled "Very Low Income". This category covers a wide range of incomes - anyone below 50% of area median income. This category is too broad and does not adequately address the needs of the lowest income households. **It appears that there is no specific Regional Housing Needs Allocation for the extremely low income sub-category.**

I feel that specific planning is needed to address the housing needs of those with extremely low incomes (below 25% AMI). This includes many individuals with a disability, an increasing number of seniors, and others with special needs. Housing to meet their needs is critical to both preventing homelessness and helping people exit out of homelessness. We have many clients who come to us because their rents kept increasing until they became so high that they could no longer afford them, so they had to move out into an emergency shelter. Similarly, when our clients are working to move out of a shelter, they are often unable to find any apartment that they can afford or landlords who will accept their income level, so they remain stuck at the shelter.

The Housing Element can be an important piece of addressing this problem, by developing a comprehensive housing plan to ensure adequate housing for those with extremely low incomes.

Thank you for your consideration.

Petra Linden
Chief Executive Officer

Commented [GU1]: The Extremely Low Income RHNA is estimated based on HCD guidance on page BR-10. In addition, more information about residents in this income category is provided on page BR-43.

Commented [GU2]: Program 7 and 10 address Extremely Low Income households.



May 12, 2023

To: Stephanie Ocasio, Director of Community Development

Matt Diaz, Advanced Planning Manager
Tristan Osborn, Senior Planner, Advanced Planning

Placeworks

Mayor Kevin Lincoln
Vice Mayor Kimberly Warmesley
Councilmember Michelle Padilla
Councilmember Dan Wright
Councilmember Michael Blower
Councilmember Susan Lenz
Councilmember Brando Villapudua

Cc: David Zisser, Assistant Deputy Director, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Jose Ayala, Housing Policy Specialist, HCD

RE: City of Stockton 6th Cycle Draft Housing Element

Dear Community Development Department Staff, Consultants, Mayor Lincoln, and City Councilmembers,

Thank you for the opportunity to comment on the 6th Cycle Draft Housing Element for the City of Stockton.

The Stockton Housing Justice Coalition is a resident-centered organization that empowers Stocktonians to advocate for policies and solutions that protect tenants and promote affordable housing through skill-building, education, organizing and storytelling. The following comments, questions and recommendations to the 6th Cycle Draft Housing Element are informed by the Coalition's direct experience with affordable housing in the City of Stockton as well as our experience interacting with residents and attempting to address their housing needs.

Policy Document

The Coalition appreciates the draft's focus on housing production. This focus is weaved throughout nearly all of the stated Goals and associated Policies. However, production-oriented policies on their own do not respond directly to the analysis conducted elsewhere within the



Draft Housing Element.

While production is an essential component of any effective plan to improve housing outcomes, the Needs Assessment and the Affirmatively Furthering Fair Housing sections indicate that feedback from local stakeholders focused heavily on the need to stabilize households that are threatened by housing insecurity and/or homelessness. There are currently no policies noted throughout the five goals that commit in a measurable way to protecting tenants or stabilizing shelter for those households that are housing-insecure.

It is also difficult to assess whether the Quantified Objectives for certain goals are reasonable because it is not clear that there has been analysis as to whether existing programs are being effective in impact. For example, under Goal HE-2: Provide High Quality Housing for All Income Groups, Program 10 states that the City will continue administering its existing entitlement programs to fund local housing programs to support the development of 200 extremely low-, 400 very-low and 450 low-income units. It also states that 75 low-income households will receive assistance from the City's down payment assistance program. The only evaluation data the Coalition was able to review is in a draft of the City's 2021-2022 Consolidated Annual Performance Evaluation Report - CAPER (the final draft does not appear to have been posted on the City's website). It does not appear that any households within the CAPER reporting period received assistance for any type of down-payment assistance and the report states that over the two-year reporting period, 10 units within a 31-unit development were supported with HOME funds. If down-payment assistance is not being utilized - the Constraints analysis indicates that from 2017 - 2023 no households were assisted by the down-payment program - and only 10 units are noted as being supported by HOME, does maintaining this status quo meet the housing needs of Stockton residents? It does not appear so and the Coalition requests that the City ensure the Quantified Objectives take into consideration historical utilization rates for its proposed programs and assess how these programs can be improved.

Program 10 also highlights another trend throughout the Policy Document that the Coalition would like to see addressed - a general lack of specificity as it relates to implementation time frames. Program 10 states that the City will "Review funding opportunities annually; down payment assistance program is ongoing." This language lacks a clear commitment to achieve the stated Quantified Objectives and similar non-committal language is used throughout.

- Goal HE-1 Increase Housing Production and Ensure Adequate Land for All Housing Types and Income Levels
 - Recent changes to state law have spurred an increase of Accessory Dwelling Units across the state as a response to natural disasters and homelessness. The Coalition is pleased to see the City is continuing its efforts to increase ADUs across the City with focus on high opportunity neighborhoods. Given the City's quantified objective of 180 ADUs, (108 units in the low-income category in Table



HE-53), the Coalition would like to see the City explore a pilot program (similar to LA County) that would ensure newly constructed (or converted) ADUs are affordable to individuals or households in low-income categories by providing incentives to homeowners (such as forgivable loans or grant assistance for construction).

- Goal HE-2 Provide High Quality Housing for All Income Groups

- All stated programs within Goal 2, with the exception of Program 11, appear to only maintain the existing status quo. If existing programs are not meeting current housing needs, it is unclear how this section will improve upon existing outcomes.

- Goal HE-4 Preserve Existing Housing

- The Coalition appreciates the draft element includes a goal explicit to housing preservation. We believe there are more explicit program goals that could be included to strengthen the focus of this section and make it more likely that a variety of preservation efforts could be explored. The City of Stockton can have a positive impact on increasing the supply of affordable homes through policies that prioritize residents and community development organizations over corporate and/or outside investors in the real-estate market. This can be achieved through the inclusion of both a Community/Tenant Opportunity to Purchase Act (COPA and TOPA) policy.
- It is well documented that a majority of low-income households do not have access to deed-restricted affordable housing. The Coalition would like to see the City establish a formal small site preservation program that would support mission-driven nonprofit developers in acquiring existing non-deed restricted units and bringing these units into the City's formal affordable housing stock.
- Challenges with the City's existing Code Enforcement model have long been uplifted by the community as failing to meet the needs of residents. There have been repeated suggestions that the City adopt a more proactive form of code enforcement and rental inspection process. Program 21 proposes no significant changes to the existing code enforcement/rental inspection model and offers no meaningful timeline for assessment or updates.

- Goal HE-5 Provide Equitable Housing and Supportive Services

- The Coalition believes the policies and programs noted under Goal HE-5 could be significantly strengthened. Equitable housing policies should address the entire continuum of housing need - including protecting tenants. Approximately



half of Stockton's population (50.1 percent) is comprised of renter households and a significant number of renters dwell in single-family homes which are exempt from any protective measures in AB 1482. The Coalition would like to see more explicit policies surrounding renter protections such as extending just-cause eviction policies to single-family rental units, actual enforcement of preventing source of income discrimination and tenant-anti-harassment policies.

SITE INVENTORY

CalEnviroScreen 4.0 is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. It also takes into account housing burden, population characteristics, education, poverty etc. Most of Stockton's RHNA sites appear to be located south of Harding Way within neighborhoods that have the highest percentile of burden (81% and above as shown in Figure 15) and are categorized as "Low Resource" and/or "High Segregation & Poverty" (Figure HE-1: TCAC/HCD Opportunity Areas) areas.

On April 12, 2023, Housing Justice Coalition members conducted a site tour of proposed Site Inventory locations. Our observations are noted in the following comments:

- Multiple sites are listed as being less than a half-acre in size. Due to economies of scale, it is highly unlikely that low-income, affordable housing would be constructed on these parcels. The Coalition recommends that the City remove such sites from the inventory due to them being infeasible for residential development.
- The Coalition urges the City of Stockton to consider environmental and health impacts of proposed inventory locations. For example, sites adjacent to freeway and freight corridors may be unsuitable for housing development due to pollution concerns (e.g. site locations).
 - APN: 14523013 & 14523012 (Church St.)
 - While there are no major structures on either of these parcels, at the time of the Coalition's site tour, it appeared that Greif Recycling was operating on this parcel and possibly the adjacent one. Additionally although these parcels are zoned for Medium Density Residential (RM) the surrounding area has a high concentration of industrial businesses.
 - 4236 MANTHEY RD STOCKTON CA 95206
 - This parcel and its adjacent ones are in close proximity to the freeway. If planned development is considered, the Coalition recommends additional mitigation efforts to offset the impacts of its proximity to the freeway.
 - 411 S STANISLAUS ST STOCKTON CA 95203



- This parcel and its adjacent ones are in close proximity to the freeway. If planned development is considered, the Coalition recommends additional mitigation efforts to offset the impacts of its proximity to the freeway.
- 850 E HAZELTON AVE STOCKTON CA 95203
 - This parcel is located in a General Commercial zoned area and is currently being used as a semi-truck parking and/or over flow lot.

Affirmatively Furthering Fair Housing

According to AB 686: Affirmatively Furthering Fair Housing (AFFH) Stockton is required by State law to use all available data and “local knowledge,” such as the recent testimony of residents and community organizations, to conduct an in-depth analysis of the fair housing issues impacting members of protected classes. The Draft correctly demonstrates that residents who are members of protected classes – in particular, people of color – are unfairly and disproportionately harmed by housing costs, eviction, overcrowding, and displacement. However, the proposed goals, policies and programs do not explicitly address feedback or ideas gathered from stakeholders including interventions such as:

- Eviction protection programs
- Right to counsel/legal aid support for renter households
- Deconcentrating poverty in the Downtown and South Stockton neighborhoods.

Additionally, other goals of AB 686 are to, “replace segregated living patterns with truly integrated and balanced living patterns and transform racially and ethnically concentrated areas of poverty into areas of opportunity”. However, Figure HE-1: TCAC/HCD Opportunity Areas shows a significant number of sites in “Low Resource” and/or “High Segregation & poverty” as well as multiple “Pipeline Projects” in areas of High Opportunity as defined by HCD, but does not indicate whether these units will be affordable to specific income levels.

Ultimately, the Coalition feels that the current draft element makes the below listed “mistakes” identified by HCD to varying degrees:

- A high-quality Assessment of Fair Housing, but status-quo actions/programs
- Does not include regional comparison in analyses
- Does not ask the public to provide input on AFFH
- Doesn't prioritize 4-5 contributing factors & connect to programs
- High resource areas can't rely on ADUs alone
- No data dumping! Tell the story



Outreach and Engagement

The City must reach ALL economic segments of the population; describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.

While several meetings were hosted by the City Community Development Department, these meetings did not reach significant portions of the City population; namely, renters (who make up approximately half of all Stockton households) and people at risk for or who are homeless. The City's method of communication with the public was primarily by online notices on its own web site. However, most working class people living in the City will not visit the City's website to find out about the Housing Element because most residents aren't aware it exists. Also, 30 percent of Stockton residents lack internet access which poses an additional challenge to accessing online materials.

All segments of the community were encouraged by the City to participate in preparation of the Housing Element through a series of efforts, including noticing of property owners of sites in the draft Housing Element sites inventory, announcements on the City's social media channels, distribution to the Housing Element email listserv, and direct contacts by email and phone with organizations serving low-income and special-needs groups. The City invited representatives of these groups to attend the public workshops on the Housing Element.

It should be noted that representatives who serve members of the community are not the same as community members themselves. Second, noticing property owners and no one else, i.e. those who rent, and those who are unhoused, ignores extensive economic segments of the community. There are no examples of the City reaching out to the Spanish-speaking community in a way that is meaningful. As such, the Coalition does not believe the City of Stockton has met its outreach obligations under AB 686.

Recommendations

Based on the above discussion, the Stockton Housing Justice Coalition would like to make the following recommendations to help strengthen the Draft 6th Cycle Housing Element and ensure its responsiveness to local housing need:

- Policy Document
 - Add more specificity to Quantifiable Objectives and Timeline language to ensure realistic and meaningful outcomes on a timeline that ensures some accountability
 - Broaden Goal HE-5 to include explicit reference and recommendation to Resident Protection policies to ensure housing, neighborhood stability and affirmative displacement mitigation for Stocktonians



- Increased collaboration with the Transformative Climate Communities programs and partners to provide professional services (reroofs/electrical upgrades) to low-income household housing stock
- Site Inventory
 - Remove any existing inventory sites that sit within 500-feet of freeway to avoid disproportionately negative health and environmental impacts on low-income households
 - Consider additional sites in high opportunity neighborhoods
 - Additional review of parcels with low acreage that have lower-income capacity
- Outreach/Engagement
 - The City should improve its outreach methods and expand its reach to include youth, those from different language communities and unhoused residents. These are populations who are disproportionately affected by the City's housing policies and the lack of inclusion of their feedback is evident in the policies and programs selected.
 - Conduct additional outreach, if time allows, and partner with community-based organizations to support additional engagement

We look forward to working with the City of Stockton to develop policies and programs that meet the housing needs of all Stocktonians.

Sincerely,

Stockton Housing Justice Coalition

Organizational and individual members include*:

- STAND Affordable Housing - Trustbuilders
- Conway Homes Resident Council
- Pandora Crowder
- Enterprise Community Partners
- Faith in the Valley
- Residents United Network - Visionary Home Builders of CA, Inc.
- Catholic Charities
- Disability Rights of California
- California Coalition for Rural Housing
- Stockton NAACP
- San Joaquin Fair Housing
- New Genesis Housing Corporation
- Reinvent South Stockton Coalition

**Coalition comments do not necessarily reflect the views of individual member organizations*



On May 3, 2023, the Stockton Housing Justice Coalition held a public, community meeting to discuss the Draft 6th Cycle Housing Element. The following housing barriers and desired policies and programs were identified by participants:

Issue/Barriers

- Lack of housing for low-income residents + emergency placements
- Creating housing in vacant properties
- Housing for people with disabilities
 - On SSI
 - Even with benefits, still unaffordable → need to have a universal definition of what low-income is and what is affordable
- Keeping people in their homes → tenant protections
- Low-income people of color only able to live in polluted + undesirable places
- Acceptance of housing vouchers → discrimination
- Transitional housing for formerly incarcerated
- Housing stock quality
 - Tenant resources → navigation
- Criminalization of unhoused residents
- A lot of vacant buildings in downtown
- Tenant bill of rights, including Right to Counsel
- Environmental (racial, social) justice → housing near polluted sites
- Concentrating poverty → new units all together, without amenities

Desired policies and programs

- New tenant protection policies
 - Funding legal aid
- Preservation programs for existing market housing
- Community land trusts
- Vacant building tax
- Enforcement against discrimination
- Public education on rights + processes (radio, classrooms)
- Navigation for unhoused
- HDAP at CA DSS → housing while applying for SSI
 - Needs to be bigger
- Extending “Just Cause” to single-family
- Universal Income for renters
- Mitigation requirements for siting in industrial + highway areas
- Eviction diversion program
- Inclusionary requirements for specific groups → domestic violence victims



- Sidewalks
- Audit of existing programs
- More mixed-income siting → choice
- City should buy more land everywhere for future development
- Partnering with school districts for teacher housing
- Rent control/lower + enforcement rent cap
- Help for people + remove barriers on rental applications
 - Credit
 - Domestic violence victims
 - Exceptions or minimums
- Mitigate landlord concerns → cleanup funds, etc.
- More landlord/tenant mediation
- Require provision of written lease
- Rental registry
- Grants for ramps
- Subsidies for ADUs → streamlining



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May 15, 2023

Sent via e-mail

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Jose Ayala, Housing Policy Specialist- jose.ayala@hcd.ca.gov

**RE: Disability Rights California's Comments on the City of Stockton's
April 2023 Housing Element Public Draft**

Dear Planning Department Staff, Consultants, Mayor Lincoln, and City
Councilmembers:

Disability Rights California submits these initial comments on the [2023-2031 City of Stockton Housing Element April 2023 Public Review Draft](#) (“Draft”). Disability Rights California is a private, non-profit disability rights organization federally mandated to advance and protect the human and legal rights of Californians with disabilities. 42 U.S.C. § 15001, et. seq., 42 U.S.C. § 10801, et seq., 29 U.S.C. § 794(e), 29 U.S.C. § 3011, 29 U.S.C. § 3012; *see also* Welfare and Institutions Code §§ 4900-49005. DRC’s comments on the Draft pertain to people with disabilities in the City of Stockton.

We appreciate the effort that went into this first draft and support many of the Draft programs. However, we believe the Draft needs further development to address housing needs and barriers for people with disabilities in the City. We provide the following comments and proposed changes to assist the City with creating a more inclusive Housing Element:

I. To Affirmatively Further Fair Housing, the City must outreach to all segments of the community, ensure housing opportunity throughout the community, set AFFH priorities, and set appropriate metrics and milestones.

Assembly Bill 686 (2018) defines Affirmatively Furthering Fair Housing as, “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” Gov. Code § 8899.50, subd. (a)(1). Stockton must administer its programs in a way that affirmatively furthers fair housing for members of a protected class and take no action inconsistent with that obligation. Gov. Code, § 8899.50(b)(12); Fair Housing Act, 42 U.S.C.A. § 3608(e)(5). These requirements exist to combat discrimination, overcome patterns of segregation, and foster inclusive communities.

While the federal duty to AFFH has existed for over 50 years, AB 686 creates new requirements for housing elements for: (1) Outreach, (2) Assessment of Fair Housing, (3) Site Inventory, (4) Identification and Prioritization of Contributing Factors, and (5) Goals and Action. The California Department of Housing and Community Development’s publication: *Implementing AB686: Duty to Affirmatively Further Fair Housing Guidance for Housing Elements* states that common mistakes and pitfalls include:

- A high-quality Assessment of Fair Housing, but status-quo actions/programs;

- A local jurisdiction refers to a county-level Analysis of Impediments to Fair Housing previously completed;
- Does not include regional comparison in analyses;
- Only analyzes patterns of low-income sites, not all sites;
- Does not ask the public to provide input on AFFH;
- Doesn't prioritize 4-5 contributing factors & connect to programs;
- High resource areas can't rely on ADUs alone; and,
- No data dumping! Tell the story.

The City's Draft contains some of these common mistakes. We offer the following comments to help avoid some of these pitfalls.

1. Outreach

The City must reach all economic segments of the population; describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.¹ Gov. Code, § 8899.50 subd. (a)(2) further requires a summary of fair housing outreach and capacity, and the City must "receive public input and local knowledge on the Assessment of Fair Housing."

The Planning Department hosted several meetings, but did not reach renters and people at risk for or who are unhoused. The City primarily communicated with the public by online notices on its web site; however, most working people in the City do not visit the City's website. The Draft also does not incorporate local knowledge other than input from service providers.

While we appreciate the outreach to organizations serving low-income and other special needs populations, including our own, representatives who serve members of the community are not the same as community members themselves. Noticing property owners but not those who rent and those who are unhoused ignores extensive economic segments of the community. Moreover, there are no examples of the City reaching out to the Spanish-speaking community in a way that is meaningful. Additionally, people with disabilities and older adults are often unable to participate in community meetings due to communication barriers, segregation, and lack of transportation access. Thus,

¹ The CA Dept. of Housing and Community Development, *Implementing AB686: Duty to Affirmatively Further Fair Housing Guidance for Housing Elements*, https://www.hcd.ca.gov/community-development/affh/docs/affh_webinar_slides.pdf

Commented [MD1]: In 2023, all Shape Stockton notices were sent in five languages, while all workshops were noticed in Spanish and English. The City will continue to work with residents and groups to extend its reach. In addition, the Housing Element has been revised to encourage more noticing in various languages so the practice will continue beyond the Housing Element Update process.

they are often not considered in the planning processes that directly and disproportionately impact them, and are undercounted in data collection. Hearing directly from people with disabilities is critical to figuring out what housing issues they face and what types of housing works for them. Having a robust community outreach and engagement plan that ensures access to meetings and planning processes will allow program participants to gather invaluable data and information from people with disabilities and bridge the equity gap.

To better incorporate the views of all Stocktonians, the City should implement a Housing Element education campaign to educate young people, those from different language communities, and those awaiting appointments at the County's Health and Human Services Agency (333 E. Washington St.), among others. The City should reach out to the community via local radio stations in both English and Spanish. There is no other way to reach the vast working poor, disabled, renting, and homeless populations of Stockton. The people of Stockton deserve to have their voice heard in the Housing Element process. Under AB686, it is mandated.

2. Assessment of Fair Housing

Among the Assessment of Fair Housing's Requirements, we primarily address disparities in access to opportunity, displacement risk, ongoing segregation, and sites selection in this comment letter.

The City of Stockton has a population of 322,120.² People of color make up 78 percent of the population where Latinx people account for more than 40 percent of that total. *Id.* Stockton is the native land of the Yatchicumne, a group of Northern Valley Yokuts people.³

A. Disparities in Access to Opportunity

a. Environmental Justice

A major fair housing concern in Stockton is environmental injustice. Importantly, “[p]eople with disabilities are specifically exposed to and vulnerable to environmental injustice” as a result of decades of ableist and racially exclusionary policies and land use decisions. And, some are also more vulnerable

² Rich Ibarra, [Stockton Named the Most Racially Diverse City in America](#), Capradio, (Jan. 2020)

³ City of Stockton: [A Look into Stockton's Past](#)

to environmental injustice because of the nature of their disability.⁴ These communities are the most impacted by pollution and other poor environmental conditions because of historic land-use decisions. For example, the percentage of people with disabilities living in areas with greater exposure to PM2.5 pollution is significantly higher than in areas with less exposure, even when controlling for other variables; this is especially true for individuals with cognitive and independent living difficulties.⁵ As a result, explicitly requiring consideration of such issues when furthering fair housing is critical.

CalEnviroScreen 4.0 is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. Much of Stockton falls above the 90th percentile for pollution burden in the state. In the map below, Red indicates communities with the highest pollution burdens: most of Stockton’s RHNA sites are within those red zones. As shown in Figure 1 below⁶, limited RHNA sites are located in the green CALENVIROSCREEN and deeper blue, high and highest resources areas, as the majority of sites are in South Stockton. However, as the table below shows, South Stockton are the lower opportunity areas, and are also the areas hit by some of the worst pollution in the entire state. This will not AFFH.

Commented [MD2]: The Housing Elements Regional Housing Needs Allocation (RHNA) housing capacity sites include approved housing projects in North Stockton that account for over ten thousand units. The maps and description below only show vacant infill properties that account for 50-percent or less than the total sites listed towards complying with RHNA.

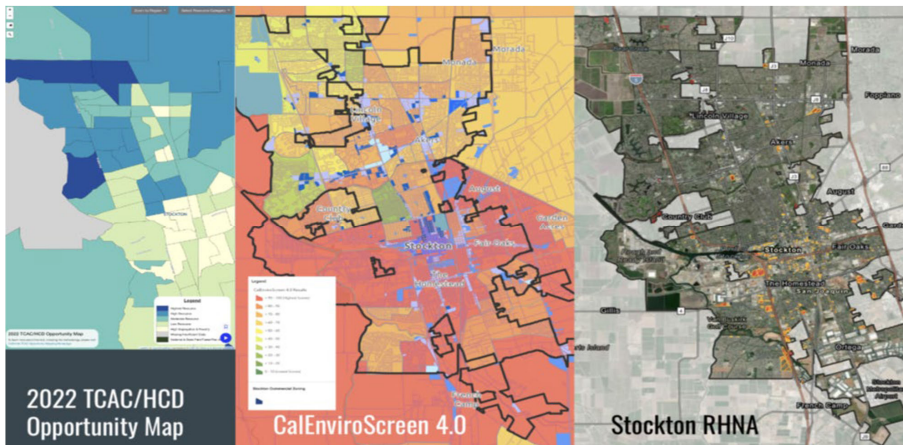


Figure 1

⁴ Catherine Jampel, Intersections of disability justice, racial justice, and environmental justice, Environmental Sociology (2018).

⁵ Jayajit Chakraborty, Disparities in exposure to fine particulate air pollution for people with disabilities in US, Science of the Total Environment (June 2022).

⁶ Stockton 6th Cycle Housing Element, UC Berkeley, prepared by Bailey Schweitzer, Weiyang Tang, Joann Martinez (Dec. 2022).

b. Transportation

Transportation access is a critical piece of fair housing. However, jurisdictions often focus narrowly on the Americans with Disabilities Act's technical requirements for fixed route and paratransit, but overlook its broader mandate for equal access to the transportation system as a whole. The type of transportation necessary varies by disability and need, and it should be clear that jurisdictions should consider not only fixed-route public transportation, but also specialized services such as paratransit, dial-a-ride, reduced-fare taxis, or volunteer driver programs. Stockton should also consider availability of parking, drop off locations, bus stops, and shelters. A stronger transportation system would expand and improve affordable mobility options including: paratransit, door-to-door services; wheelchair accessible transportation network companies, and demand response real time ride systems; volunteer driver program expansions; nonprofit service provider systems; stipends/free rides for caregivers; gas subsidies, and more. The City's analysis of parking standards notes that some parking minimums have been waived for affordable housing, or that built via TOD. Unfortunately, the ADA's only technical requirement regarding parking spots for people with disabilities is that there be a percentage of spots for disabled persons. Any percentage of zero is zero. Not all disabled people can use public transit, and require a parking spot, a spot for their caregiver, or a pickup spot for paratransit vehicles. As explained below, We recommend that the City amend Program 27, Addressing the Needs of Those with Disabilities, to develop an overall accessibility program that includes ensuring that disabled parking spots are available even where parking minimums have been waived. Accessible, available, and affordable travel options make it possible for diverse groups of people to stay active and engaged in their communities.

Commented [GU3]: Revisions have been made to Program 29 to address this comment

Commented [GU4]: Revisions have been made in the Potential Housing Constraints section in the Parking Standards subsection to address this comment.

c. Houselessness

As discussed below, unhoused individuals have a high prevalence of disability. A discussion of barriers to fair housing is not complete without recognizing that Stockton recently passed one of the most onerous and restrictive encampment sweep ordinances in California, which bans "camping" (defined as "to place, pitch or occupy camp facilities; to live temporarily in a camp facility or outdoors; to use camp paraphernalia") in areas broadly defined as "critical infrastructure" at the risk of misdemeanor charges and up to \$25,000 in daily fines. The term critical infrastructure is defined to include locations ranging from hospitals to parks. Stockton, California Municipal Code, Charter, and Civil Service Rules, Title 8 Health and Safety, Chapter 8.100 Protection of Critical Infrastructure and Wildlife

Risk Areas.⁷ Further, while the Ordinance was specifically created to address symptoms of homelessness⁸, it does not include a requirement that people have true access to services or housing before being removed or having their property taken. This must be assessed as a barrier.

Commented [MD5]: Staff believes this does not create a barrier to establishing or being housed in a new shelter as defined by state law.

B. Displacement

We appreciate that the City recognizes that preservation and creation of affordable housing is critical to minimizing displacement risk. However, the City has recognized that the City is at risk of losing naturally occurring affordable housing due to an influx of Bay Area residents. Research and experience demonstrate that effective anti-displacement measures include housing preservation (especially for naturally occurring affordable housing), tenant protection, and affordable housing strategies.⁹ The City commits to programs addressing housing preservation and affordable housing development, but not tenant protection. And some of its programs, for example, Program 14, is listed as a place-based revitalization strategy; but fails to address how to ensure that weatherization does not result in higher rents and ensuing displacement. A deeper level of analysis is necessary. Similarly, if not done with anti-displacement protections in place, Code Enforcement can do, and has done, the same.¹⁰ Indeed, the City discusses revitalizing “blighted” areas but does not explain what “blighted” means, which neighborhoods might be impacted, and how. Historically, revitalization of blighted neighborhoods has been paired with displacement of low-income communities. Indeed, the City is removing its 5th Cycle Element program that noted that development in blighted areas would be done with an eye toward preventing gentrification. The City must engage in a deeper analysis of such risk and how its own programs can exacerbate or mitigate that risk.

Commented [MD6]: City staff agrees that some programs could impact other programs regarding the need to rehabilitate housing and inclusionary fees and housing costs. The Housing Element directs staff to further explore the implementation of all programs (including funding), while the Housing Action Plan will make further recommendations to better implement housing policy. These programs will be monitored annually as required per state law.

Displacement can create unique harms to people with disabilities, who may have developed formal and informal systems of care, developed accessible transportation routes, and/or modified their homes to accommodate their needs. Displacement can disrupt these systems in a way that is devastating to a person’s health. And, the stress of displacement alone can exacerbate symptoms of

Commented [MD7]: The previous element did not discuss displacement, while the current element includes new policies to address state law and feedback received.

⁷ https://library.qcode.us/lib/stockton_ca/pub/municipal_code/item/title_8-chapter_8_100

⁸ [https://www.stocktonmayor.org/files/Legislation%20Text%20\(9\).pdf](https://www.stocktonmayor.org/files/Legislation%20Text%20(9).pdf)

⁹ Karen Chapple and Anastasia Loukaitou-Sideris, White Paper on Anti-Displacement Strategy Effectiveness, February 28, 2021, available at www.urbandisplacement.org/wp-content/uploads/2021/08/19RD018-Anti-Displacement-Strategy-Effectiveness.pdf.

¹⁰ See, e.g. *Price v. City of Stockton*, 394 F. Supp. 2d 1256 (2005)(holding private right of action of federal relocation laws where aggressive code enforcement shut down SROs).

disabilities. Therefore, we also believe it is important to include programs that have the most immediate impact on preventing displacement. “[N]eighborhood stabilization and tenant protection policies have the most direct and immediate effect on mitigating displacement”¹¹ – this includes a strong local rent stabilization program, including for mobilehome parks. Therefore, as explained below, we urge the City to include such a program in its anti-displacement programs. Given the City’s indication that it will create neighborhood action plans in neighborhoods that are susceptible to gentrification, like Little Manila, this is a critical AFFH issue.

Commented [MD8]: Housing Analysis and interviews with the development community have indicated that the housing market (rental/sales) in Stockton does not have the capacity to absorb significant fee increases or significant losses in revenue that would impact the net operating income (NOI). While the Housing Element policy has been revised to direct staff to continue to explore financial assistance (upfront and ongoing cost), topics like rent stabilization will need to be explored in more detail with additional market research and outreach.

C. Legacy of Redlining, Segregation, and Urban Renewal: RECAPS and RCAAs

The discriminatory impacts of Stockton’s past redlining endure to this day as well. Redlining is the term for the process that spatially segregated the affluent white population from the predominantly Black and "economically disinvested". The zones were categorized by a color scale, and Green indicated the most affluent and white neighborhoods. While Red, represented the non-white areas. Comparing the 1930s Home Owner’s Loan Corporation redlining map to today’s demographic makeup proves this segregation persists in modern-day Stockton. The map on the right displays the original Redlining zones within modern-day Stockton boundaries.

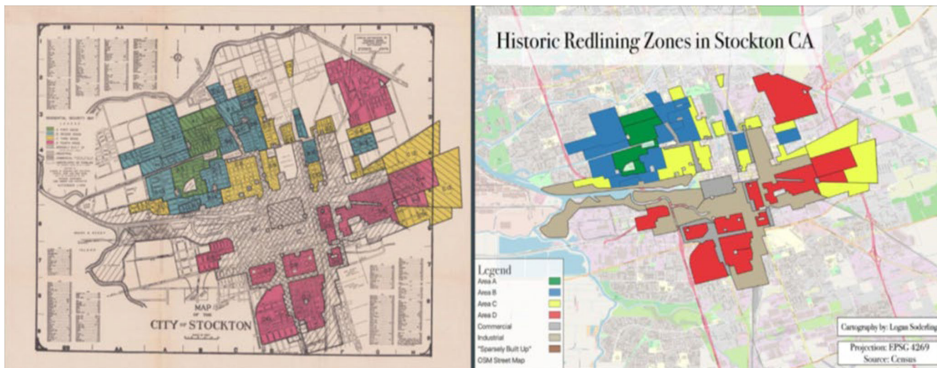


Figure 2¹²

¹¹ *Id.*

¹² Stockton 6th Cycle Housing Element, UC Berkeley, prepared by Bailey Schweitzer, Weiyang Tang, Joann Martinez (Dec. 2022).

According to AFFH mapping tools by HUD and HCD we see that segregation still exists and has affected housing policies. (See Figure 3).

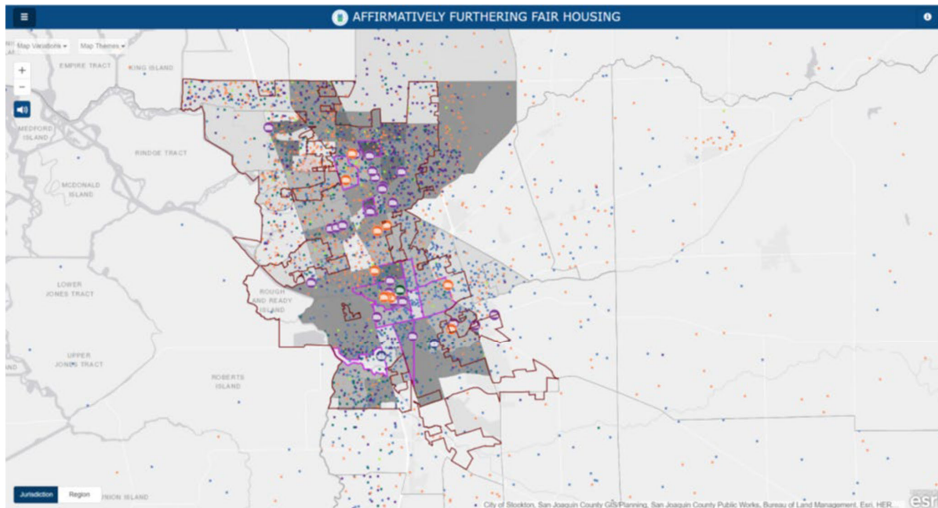


Figure 3¹³

For example, decision makers built a freeway through the Filipino Neighborhood of Little Manila in Downtown Stockton, destroying family homes, businesses, community centers, and much more. Redlining has also excluded many communities of color from homeownership; now over 77% of extremely low income households in San Joaquin County pay over half of their income on rent¹⁴. We also know that renters of color face the highest rates of cost burden in San Joaquin County¹⁵. While the City notes that it will work with the housing authority to market vouchers in higher resourced areas, that is not enough to create authentic housing choice. The City should consult with community members to understand better their barriers to housing choice. Further, we understand the Stockton hired consultants to conduct an inclusionary zoning ordinance feasibility analysis, however the results are not included in the current Draft, other than a conclusory statement that such a program is not feasible. The City should at minimum explain why such an ordinance is not feasible in its AFH. The City must also consider how to incentivize affordable housing in RCAAs while also ensuring

Commented [GU9]: Programs 6, 10, 12, 13, 15, 24 and 25 in in the Policy Document address RCAAs

¹³ *Id.*

¹⁴ California Housing Partnership, [Housing Need Dashboard](#), (May 2023).

¹⁵ *Id.*

that deed-restricted affordable housing will be prioritized in RE/CAPs that are sensitive to displacement risk. The sites inventory does not currently reflect that.

The City also must address how its existing policies contribute to segregation in its Assessment of Fair Housing. For example, it must analyze how the City's policies toward the unhoused (e.g. towing policies, shelter zoning, etc.) exacerbate segregation. A report completed by students at U.C. Berkley and attached here as exhibit A, highlights the historical segregation patterns of Stockton. Unsurprisingly, the majority of unhoused persons in Stockton are Black and Latinx and continue to exist in the segregated areas of Southern Stockton, whether in shelters, the health and human services system, or in the encampments scattered throughout the City's proposed majority RHNA sites.

The Housing Needs Analysis demonstrates that existing low-income renters are living in rent-burdened, overcrowded, and substandard conditions. Indeed, the overwhelming majority of households with the lowest incomes are severely rent-burdened. We encourage the City to account for this disparity when accounting for housing needs. Additionally, when considering resources, the City should identify ones that can be feasibly used. While working with the County housing authority's Section 8 Housing Choice Voucher program is a laudable undertaking, it is unclear how residents could, once they make it to the top of the lengthy waitlist, obtain housing in the City given the already significant overcrowding and unavailability of appropriately sized units. Market rate housing is clearly not meeting the needs of the City's lowest income households, the overwhelming majority of whom are renters.

3. Site Inventory

AB 686 modified Housing Element Law such that a jurisdiction's Assessment of Fair Housing (e.g. segregation & integration, R/ECAP, etc.) should inform the identification of sites in a manner that AFFH. The site identification requirement must assess whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns. Do they transform racially and ethnically concentrated areas of poverty into areas of opportunity?

Stockton's sites inventory is predominantly located in South Stockton. Per SB6 and AB2011, Stockton should consider doing a more in depth review of failing commercial corridors in high resource areas, rather than in places like South Stockton. Comparing the sites inventory to CalEnviroScreen 4.0 indicates

Commented [MD10]: The City would like to know more about what policies contributed to segregation. The Housing Element requires analysis of the existing General Plan and zoning policy and standards that impact housing in the City. City staff is unaware of any existing policy that results in segregation or increases in unhoused populations.

Commented [GU11]: State required analysis of where and how emergency shelters are allowed in the City's Development code is included in the Potential Housing Constraints section.

Commented [MD12]: City staff will rely on guidance from the state on how to analyze sites to address the RHNA and compliance with under SB 6 and AB 2011.

In addition, City staff is proposing a revision to the Housing Element that would result in a Development Code update to include performance measures for potential housing within AFFH-designated sites to include enhanced design and building materials before construction to help mitigate any surrounding environmental impacts.

that most of the selected sites are located in the heavily polluted downtown and south of downtown. (See Figure 4).

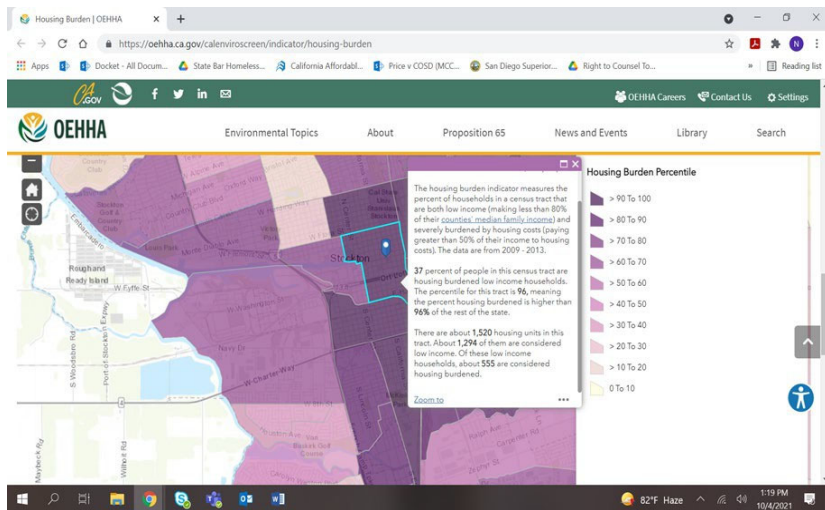


Figure 4: “The housing burden indicator measures the percent of households in the census tract that are both low income (making less than 80% of their counties’ median family income) and severely burdened by housing costs (paying greater than 50% of their income to housing costs)...The percentile for this tract is 96, meaning the percent housing burdened is higher than 96% of the rest of the state.”

DRC is concerned by the overlap between some of the largest selected parcels and clean-up sites. For instance, the site consisting of parcels 14523013 and 14523012 appear to be the largest selected at just under 40 acres, yet any residential development there would require brownfield mitigation. We commend Stockton for using EPA Brownfield Assessment Grant funds to assess how the city can revitalize current brownfield sites in the city’s downtown waterfront. However, the aforementioned parcels are not one such site.

According to the EPA, long-term stewardship of former brownfield sites is costly, and the costs of remediation are unknown prior to a site assessment. This means that building housing atop brownfield sites might be financially unviable without a local financial contribution for brownfield clean-up. If Stockton chooses to include numerous brownfield sites in its RHNA inventory, it must be able to

Commented [MD13]: While City staff has recently worked with the owner to rezone the site from medium density housing to commercial general which could allow more commercial and high density residential options, the site will be removed from being calculated towards meeting RHNA. This is due to owner interest to explore other commercial uses in the near term.

justify that these sites can be cleaned within the eight-year housing element cycle. Otherwise, the city should exclude these sites from their inventory.

The above 40-acre site also contends with significant air pollutants as it is surrounded by multiple highways, a highway interchange, and abuts a rail line. Therefore, even if a brownfield clean-up is conducted, we believe Stockton should avoid encouraging residential development there. More importantly, surrounding areas are often polluted brownfield sites. So, although residents may not be breathing in toxins from the parcel their apartment is on, they may suffer from pollutants on adjacent sites. As such, focusing affordable housing construction on brownfield sites would be a violation of both AFFH and SB 1000 Environmental Justice Element requirements. Given this, we ask Stockton to avoid heavily relying on brownfield sites to meet Stockton's low income RHNA allocation, without having a plan for remediation in place.

Commented [MD14]: None of the sites listed for RHNA compliance are official brownfield or super fund sites. The city acknowledges some analysis may be required as part of the construction review process; however as the sites allow housing by-right, it is reasonable to assume remediation and construction will be achieved within the 8-year cycle. Staff will coordinate this with the State as part of their review.

Further, Disability Rights California participated in a site tour of roughly 25 sites in South Stockton on April 12, 2023 to verify this analysis. Consistent across all 25 sites were the proximity to industrial businesses, lack of transportation, lack of grocery stores, closeness to the I5 and 4 freeways i.e. concerns for pollution, and in some areas, lack of sidewalks and proper lighting. Disability Rights California has talked to community members with disabilities and learned how the lack of sidewalks and proper lighting can prevent neighborhood access and access to opportunity, especially when an extremely limited access to food, goods, and services in the area already exists.

4. Identification & Prioritization of Contributing Factors

The housing element must identify and prioritize significant contributing factors to segregation, R/ECAPS, opportunity access, & disproportionate housing needs. A Fair housing contributing factor is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all prior AFFH analyses (Outreach, AFH, Site Inventory). Identification and evaluation of contributing factors must: Identify fair housing issues and significant contributing factors; Prioritize contributing factors, giving highest priority to those factors that most limit or deny fair housing choice, access to opportunity, or negatively impact fair housing or civil rights compliance. It must discuss strategic approaches to inform and strongly connect to goals and actions. Goals and actions should stem directly from Contributing Factors. Prioritization is important (4-5 max), and they must be tailored to local conditions.

The City did not complete this portion of the required AFFH analysis. Fair housing contributing factors have been identified by community members. For example, at the May 3, 2020, Stockton Housing Justice Coalition meeting, Stockton residents cited the following: lack of affordable housing for low income residents, low-income people of color segregated to polluted, undesirable locations; widespread housing discrimination on the basis of disability and source of income; lack of transitional housing or other housing opportunities for formerly incarcerated persons; poor quality of existing housing stock; criminalization of the unhoused; and displacement pressures generally. These are all significant contributing factors to segregation, R/ECAPS, opportunity access, and disproportionate housing needs of communities and individuals because of protected characteristics. The City must complete this analysis and prioritization.

Commented [MD15]: City staff is confident that the proposed AFFH analysis complies with State Law. Other groups and factors that could impact housing (i.e., incarceration) could be explored as part of the Housing Action Plan or other housing efforts conducted with the City's regional partners.

5. Goals, Actions/Programs, Metrics and Milestones

While the Draft Element has a broad AFFH program, many of those programs are existing ones, and the City does not lay out metrics and milestones to determine whether its actions are meaningful.

Program 28, "Practices to Affirmatively Further Fair Housing," at H17-H18 of the Draft states that the City will implement the following strategies to affirmatively further fair housing in coordination with the efforts of this action:

- Strategies to facilitate housing mobility/expand affordable housing in high opportunity areas:
 - Programs 6, 10, 12, 13, 15, 24, 25
- Strategies to reduce or prevent displacement/place-based revitalization strategies:
 - Programs 4, 7, 9, 14, 16, 19, 20, 21, 22, 29

The Draft further states that the City will continue to support fair housing monitoring and enforcement.

While the Draft includes raw demographic data and points to some of its Housing Element Programs as furthering fair housing, it fails to assess whether individuals have actual housing choice and does not identify how it will measure whether its programs are making a meaningful impact. After completing such an analysis of housing choice, the City can turn to fashioning appropriate goals and programs. We have made comments on those below, including suggested revisions to those in the draft; however, the City should ensure that it explains how the programs it suggests will AFFH will actually do so, and how they are

Commented [MD16]: There are a variety of influences that impact a renter's or homeowner's choice beyond financial ability and market conditions. Many of these are discussed in the housing element, but City staff is not sure what "actual housing choice" is alluding to. While Staff is confident the choices described in the draft housing element are consistent with state law, we welcome the chance to elaborate with the DRC further as part of the housing action and neighborhood action plans currently in progress.

connected to the assessment of fair housing. From there, the City must also that include concrete milestones and metrics to evaluate the progress on the programs and fair housing results – otherwise, how will the City know that its programs are meaningfully affirmatively furthering fair housing?

Also, individuals who are chronically homeless, by definition, have a disability; the draft element fails to consider this intersection of needs. Please see below for more comments regarding the City’s Homeless Programs.

II. Housing Needs Assessment for People with Special Needs § 65583(a)(7)

The City fails to adequately quantify and analyze the housing needs of people with disabilities. Gov. Code § 65583(a)(7) requires “An analysis of any special housing needs, such as those of the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter.”

While the Draft includes a breakdown of the percentage of people with different types of disabilities was provided via U.S. Census data, the census data breaks down disability into only four categories for hearing, vision, independent living, and cognitive. Different types of disabilities require different types of accommodations and modifications in housing, and the residents of the City of Stockton have various combinations of disability, all with their own unique combination of resultant functional limitations possibly needing housing accommodations. Without planning explicitly for accessibility of all kinds, disabled Stocktonians will not have adequate homes to live in. This Draft does not do so and therefore fails to account for every economic segment of the community and is contrary to the duty to AFFH.

The City spends a fair amount of effort discussing people with Intellectual and Developmental Disabilities, which DRC appreciates. The City’s Draft also states that “according to the California Department of Developmental Services, as of April 2022, the Valley Mountain Regional Center served 16,443 residents with developmental disabilities in the region and 5,387 residents in Stockton... A significant number of developmentally disabled Stockton residents receiving services from the Valley Mountain Regional Center lived in group home facilities (10.2 percent of adults). Most developmentally disabled individuals lived “at home” (76.8 percent).”

However, the word “at home” is misleading here as what this truly means is that 76.8% live “at home” with their families. Most of these families include aging

Commented [MD17]: The city has added quantifiable objectives to certain programs. While the city welcomes additional use of existing and new programs, as some of these programs rely on a third party for success (outside funding sources, residential loans for purchase/remodel, etc.) some of the success is contingent on the activity of those third parties. While the proposed policies comply with providing quantifiable objectives, the plan cannot force third parties act upon the quantifiable objectives.

Commented [MD18]: City staff will discuss this with the state for compliance with special housing needs requirements.

Commented [MD19]: The City is confident that the element complies with state law regarding the state-required “special housing needs” and “AFFH” requirements. The City is open to exploring various types of subgroups beyond what is required by state law and the census.

parents from the baby boomer generation with children with I/DD, putting those children at risk of homelessness when their family members pass, as their SSI is not sufficient to afford market rate housing. And because they have been living with family, they will not have any other benefits established. Indeed, the City acknowledges in its Draft that “many persons with disabilities rely solely on Social Security Income, which is insufficient for market rate housing.” Draft at BR-32. A significant portion of this 76.8% of those being served by the Regional Center could live independently, but for any affordable, accessible, safe, inclusive and non-segregated housing options.¹⁶

In addition, per the City’s own data, a rather shocking statistic coming out of U.S. Census shows that in Stockton, among school age children, nearly half (48.6 percent) have a “cognitive impairment.” For persons with disabilities ages 18 to 64 years, 27.4 percent have trouble walking, 23.2 percent have cognitive impairments, and 20.8 percent have difficulty with independent living.

Many people with mental health disabilities require supportive services to maintain stable housing. The City should separately analyze the housing needs of people with mental health disabilities and create programs to specifically address those needs. Those needs include: supportive housing, crisis housing, shared housing, and other innovative housing models. Without addressing this issue, people too often cycle between houselessness and institutionalization.

Further, there is no discussion of the unique needs of Blind residents, or those of Deaf residents.

In addition, the City should recognize that people who are homeless are by definition people with disabilities for their analysis of special populations. Those who are formerly incarcerated face incredible barriers to housing in Stockton as they face criminal background checks for rental housing, credit checks, and a myriad of other barriers. People who are formerly incarcerated are mostly people of color and people with disabilities and Stockton’s Housing Element Draft does not account for the housing needs of this special population. As such, it is also not AFFH.

The Draft states, “[t]he unhoused are a fair housing concern, and it is often difficult to collect informative data that accurately reflects the magnitude of the

¹⁶ Two reports attempt to assess the housing needs of people with intellectual/developmental disabilities, despite a dearth of accurate data: <https://scdd.ca.gov/wp-content/uploads/sites/33/2018/12/STATEWIDE-STRATEGIC-FRAMEWORK-FOR-EXPANDING-HOUSING-OPPORTUNITIES-FOR-PEOPLE-WITH-INTELLECTUAL-AND-DEVELOPMENTAL-DISABILITIES-10.16.pdf> and

Commented [MD20]: The City is confident that the element complies with state law regarding the state-required “special housing needs” and “AFFH” requirements. The City is open to exploring various types of subgroups beyond what is required by state law and the census.

Commented [MD21]: This is included in the proposed element.

Commented [MD22]: The City welcomes the chance to speak with the DRC about how we can provide more services to different population groups. Whether in the Housing Action Plan or other effort.

population at risk, resulting in undercounting.” The data source the City uses is a Point-in-Time count led by the San Joaquin County Community Development Department and the Central Valley Low Income Housing Corporation in late January 2022. The City estimates it has “921 persons without nighttime shelter as of the 2022 Point-in-Time (PIT) Count. The size of shelters in Stockton is based on building and fire code allowances and there is no maximum number of beds.” The City’s analysis is as follows:

Government Code Section 65583(a)(4)(I) requires a minimum of 200 square feet per person to meet the unsheltered need. To address the unsheltered needs of 921 people, this would be a minimum of 184,200 square feet or 4.2 acres. The 21 vacant parcels in the IL, IG, and PF districts range in size from 0.11 to 5.11 acres. Therefore, there are sufficient sites in the city to address the potential need for emergency shelters to accommodate 921 unsheltered persons experiencing homelessness.

However, the total number of homeless people living in the City is admitted to be undercounted. According to Community Based Organizations working with homeless in the many encampments in Stockton, the number is closer to 5,000 people who may need emergency shelter on any given night. Additionally, Stocktonians experienced extreme flooding and heat waves in 2022 which have resulted in increased homelessness. The City states in the draft that “[w]hile the results suggest there has been an increase in the number of unsheltered homeless, the increase may also be a result of a more complete and rigorous unsheltered count.” However, DRC participated in the 2022 Point-in-Time Count and observed various issues with the City’s methodology for counting people experiencing homelessness in the City. The City chose to allot only one day to conduct a PIT count for Stockton—the largest city in San Joaquin County, and conducted the entire count for approximately no more than six hours total. Further, even if a person had no home or a regular place to sleep, the City instructed volunteers not to count someone as experiencing homelessness if they had not slept on the street the night before the PIT count. This approach and methodology surely resulted in a low count. Inaccurate counts of those experiencing homelessness stand to hamper the City’s efforts to end homelessness and likely decrease the ability to get appropriate funding from state, federal, and philanthropic sources. Data from, for example, the school district, could help supplement the PIT data to create a fuller picture of the number of unhoused in Stockton.

Commented [MD23]: These numbers are based on local projections provided by our regional partners. The city will continue to monitor these counts as they are updated by our qualified providers.

Commented [MD24]: The City will continue to explore the best practices for homeless counts and funding options.

The City must also make diligent efforts to evaluate the level to which its shelters and transitional housing present barriers for people with disabilities. For instance, many people with disabilities cannot access housing without reasonable accommodations (e.g. emotional support animals or other policy changes to strict rules) or reasonable modifications (e.g. grab bars installed or other physical accessibility changes). In our outreach to unhoused community members, we have encountered many who cannot access congregate settings like shelters or transitional housing in Stockton due to lack of accommodations for their disability, or because a shelter environment just cannot work for them (e.g. people with significant mental health conditions, or people with autoimmune diseases).

In our work, we often hear from municipalities that they have put policies in place to account for the needs of people with disabilities, and that they expect their contractors and employees to follow those policies and the relevant laws. However, in our experience, such an approach is not enough to actively prevent harm to people with disabilities. There must be a proactive and continued effort made to assess barriers, implement a plan to address identified barriers, and ongoing training and technical assistance. Without these additional steps, we have found that many people with disabilities will continue to be locked out of suitable shelter and/or housing opportunities, thus continuing the homelessness cycle. The difficult truth is that for some people, living on the streets feels better for them and their disabilities than residing in a shelter or transitional housing environment. The shared goal for us all is to ensure that people are not made to feel this way. And, lastly, the City's numbers must include people who are not technically homeless, but who cycle through homelessness and institutions regularly, such as those with mental health disabilities, and formerly incarcerated populations.

III. Programs

Overall, DRC is pleased with the City's goals to create more housing for all income levels and for special populations. However, the quantified objectives articulated for each program do not match the actual needs according to the City's own analysis and data. As an overall comment, policies refer to a Housing Action Plan (e.g. Goal HE-1 and Policy HE1.13, Program), but the policies guiding that plan are not incorporated into this Housing Element, and should be included in the Draft to ensure that they are consistent.

A. Program 15. Development Code Revisions

Commented [MD25]: City staff agrees that the Housing Element must be consistent with the Housing Action Plan and the Neighborhood Action Plans in progress; however, the action plans are implementing tools that will make additional recommendations for action beyond what is required as part of the housing element. The Housing Element Goals, Policies, and Programs have been revised to reflect this consistency and be the foundation for future recommendations discussed in action plans.

Currently the zoning code defines supportive housing in Municipal Code section 16.240.020 and indicates that it is a permitted use by right in special purposes or commercial zones. The zoning code must be amended to allow supportive housing by right in all zones where multi-family and mixed uses are permitted. Government Code section 65583(c)(3). This is in addition to the requirement that transitional housing and supportive housing shall be considered a residential use subject only to the same restrictions that apply to other residential units of the same type in the same zone. *Id.*

Commented [GU26]: City is already in compliance with this law. This is discussed in the Potential Housing Constraints section.

B. Program 21. Code Enforcement Program

This program states the City shall continue to inspect housing units in “targeted areas” to check for building code violations. In situations where properties cannot be rehabilitated, the City will “continue to enforce the removal and replacement of substandard units.” Here, 2,000 units annually is the quantifiable objective and completed via the “Police Department: Neighborhood Services Division”, which houses code enforcement. DRC actively engages in frequent, ongoing conversations with Stocktonians who are unhoused, renting, people of color, and people with disabilities. Conditions of the current housing stock in Stockton are a major concern.

To better address this major concern, we recommend that the City commit to moving from a complaint-based code enforcement system to a proactive one, and one that includes tenant protections to prevent displacement (see displacement discussion above). This could include creating a rent escrow account program as well as engaging in proactive inspection. We can provide sample programs if needed.

Concerningly, Policy 4.4, which cross-references Program 21, states that the City will continue to implement a Crime Free Multi-Family Housing Program. HCD’s AB 686 Guidance explicitly recognizes such programs as barriers to AFFH. Such programs most often serve to discriminate against Black and Latinx households, disabled people, and domestic violence survivors.¹⁷ The City should identify this program as a barrier to AFFH and create a program to remove it. Similarly, given the barriers to reentry faced by people leaving institutions

Commented [MD27]: The City will coordinate with the State to assess if the program is a barrier under current housing law.

¹⁷ See Liam Dillon, Ben Poston, Julia Barrajas, Black and Latino renters face eviction, exclusion amid police crackdowns in California, Los Angeles Times, November 19, 2020, available at <https://www.latimes.com/homeless-housing/story/2020-11-19/california-housing-policies-hurt-black-latino-renters>; See also, e.g. Alisha Jarwala & Sejal Singh, When Disability is a “Nuisance”: How Chronic Nuisance Ordinances Push Residents with Disabilities Out of Their Homes, Harvard Civil Rights-Civil Liberties Law Review, Vol. 54, Page 875, available at <https://harvardcrcl.org/wp-content/uploads/sites/10/2019/07/54.2-Jarwala-Singh.pdf>

including jail and prison, Code Enforcement should not be housed in the City's Police Department, so as to ensure that residents can work proactively with Code Enforcement.

C. Program 24. Continue to Assist the Disabled in Community Development Block Grant Project Areas.

DRC is pleased with Program 24: The City shall continue to include special provisions for housing the disabled in CDBG project areas, including mobility grants for homes (e.g., Emergency Repair Program) and accessibility features for 120 low-income individuals and households in Stockton, including rental units for owners of 4 or fewer rental units. Will the program be available to renters? If not, the City should identify funds to expand the program to renters who need modifications to make their unit accessible. This would also allow older adults to age in place.

D. Program 25. Universal Design

We support the City's Program 25, but note that while universal housing design is an important, the Housing Element should be clear that universal design is not synonymous with full accessibility; the needs, goals, and programs should clarify that the City will encourage both. The City should inventory the amount of its housing stock that is accessible and affordable to people with vision and/or mobility impairments. If the City cannot track these, it should include a program to monitor and track such units, and to make such information available to the public. The City should also make its list of affordable units available to the public. As part of this program, the City should include enforcement of existing accessibility standards. Local governments can affirmatively further fair housing by ensuring that Code Enforcement staff understand accessibility standards and are enforcing those laws.

Commented [MD28]: City staff is working on conducting a housing condition survey and monitoring the housing capacity sites but is not sure how a list like this would be implemented as there are a variety of factors that go into a residential unit being deemed ADA accessible in general. More feedback from groups like the DRC is needed for future discussion.

E. Program 27. Addressing the Needs of Those with Disabilities

As outlined above, Stockton is home to a large number of people with disabilities, including low-income people of color with disabilities. However, the City's programs address only a small portion of their housing needs. After the City identifies the needs of people with mental health and sensory disabilities, in addition to mobility and I/DD, it should include specific information on how to address their needs in this program.

a. Intellectual/Developmental Disabilities

The City says it will continue to work with the Valley Mountain Regional Center to implement an outreach program that informs families in the city about housing and services available for persons with developmental disabilities. However, the “quantified objectives” for this program are described as “N/A.” Draft pg. HE-17. This is unacceptable. Senate Bill 812 mandates a discussion of potential housing resources for people with I/DD and this is absent from the Draft.

People living with a developmental disability can live in various types of housing, and often face a lack of truly integrated, community-based options. Such options include:

- Rent-subsidized affordable housing, with services if necessary, accessible, close to transit and community¹⁸
- Section 8 Apartment/Housing Choice Voucher with housing navigation supports. Few regional centers contract with housing navigators – but people with specialized training to help place individuals in housing can be critical.

The City should also ensure that the Housing Authority is complying with the obligation to exclude IHSS income of family members serving as caregivers when it calculates household income. Overall, individuals with I/DD should have choice to live in the most integrated, non-segregated settings possible. Only when absolutely necessary, the following may also be appropriate: Licensed and unlicensed Single Family homes, modified, of 3-5 bedrooms, or housing specially modified for the Medically Fragile (SB 962 Homes)

b. Reasonable Accommodation Ordinance

We appreciate that the City will amend Chapter 16.214 of its Municipal Code, pertaining to reasonable accommodations. We support that Program 27 proposes to remove two of the findings that are part of the City’s Reasonable Accommodation approval process for consistency with State law: (1) whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures, and (2) whether alternative reasonable accommodations could provide an equivalent level of benefit. DRC would like to state this change should be made immediately. However, additional changes are needed to bring the ordinance into compliance with state law. We urge the program include a commitment to make the following changes:

Commented [GU29]: This information has been used to update the section on those with Developmental Disabilities in the Existing Needs Assessment section.

Commented [GU30]: These items have been added to Program 27 in the Policy Document

¹⁸ For an example of integrated, disability-forward housing models for people with I/DD, see <https://thekelsey.org/>.

- Section 16.214.030 Definitions: “Individual with a disability” means any person who has a medical condition, physical disability, or mental disability that substantially limits one (1) or more of the person’s major life activities, as those terms are defined in the Acts.” The City’s definition here aligns with the federal, but not the state definition of disability. To comply with Government Code § Gov. Code §12926.1(c), the City must strike the word “substantially”. The City should also include complete definition of disability: The Act protects any of the following: an individual with a physical or mental impairment that limits one or more major life activities; anyone who is regarded as having any such impairment; or anyone who has a record of having such an impairment. Individuals in recovery from drug or alcohol abuse are protected by federal and state fair housing laws. However, individuals currently using illegal substances are not protected under the law, unless they have a separate disability.
- The protections afforded people with disabilities under federal and state fair housing laws extend to those who are associated with them, including providers and developers of housing for people with disabilities.
- Section 16.214.060 Application Filing: A provision should be made to ensure confidentiality of the person with a disability’s contact and medical information. Further, this section should make clear that not only may a person with a disability file an application, but also an organization serving people with disabilities (e.g. sober living homes, transitional or supportive housing for people with disabilities, etc.)
- Section 16.214.070 Review and Processing: Reasonable accommodation requests do not require that the City notify neighbors of the request. Such notification will in most circumstances, invade the applicant’s privacy rights, or possibly result in discriminatory or not-in-my-backyard behavior. This requirement should be removed, both to ensure meaningful access to the City’s land use and zoning programs under the ADA and to affirmatively further fair housing under AB 686 and the Fair Housing Act.
- Section 16.214.080 Findings and Decision: We recommend that the City add a clause making clear that if the request is denied because it would impose an undue financial and administrative burden on the County and/or would require a fundamental alteration to the zoning or building laws, policies or procedures of the County, the Director or their designee must engage in an interactive process with the person seeking the accommodation to determine if there is another reasonable accommodation that may provide an equivalent level of benefit.

Commented [MD31]: As indicated in the proposed programs, updates to the reasonable accommodations standards are already underway and are anticipated to be completed with the development code update in early 2024.

- Section 16.214.090 Appeals: We recommend that appeals are directed to the City Manager in consultation with the ADA Coordinator, in order to ensure confidentiality.

F. Program 23. Continue to Support Organizations Assisting Homeless Persons

Program 23 seeks to increase shelter and transitional facilities and provide short term financial assistance for households at risk of becoming homeless, however, exactly how this would work is not defined. Program 23 states:

“The City shall annually apply for and continue to pursue State and federal funds available to the City, private donations, and volunteer assistance to support homeless shelters. The City shall continue to provide financial assistance from its Emergency Solutions Grant (ESG) funding to homeless service providers and continue to support additional development of shelter facilities *as requested by shelter providers*. In addition, the City shall review the need for additional shelter facilities and services when it updates its Consolidated Plan.” [emphasis added]

First, under the Housing Element, the City must plan for all economic segments of the community and that includes those with little to zero income; it includes homeless people. So, to say the City will “support” additional development of shelter facilities, but only “as requested by shelter providers,” is not a proper metric to AFFH or substantiate a meaningful program to address the actual needs findings. Further, in order to end homelessness, emergency shelters and even transitional housing cannot continue to be the City’s primary mode of addressing the issue.

Under Program 23, the City aims to assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. As part of this, the City will increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. DRC opposes increasing the use of institutional-type settings to house people, which often includes board and cares. Through our role as the state’s Protection and Advocacy agency, we hear about such institutional conditions from clients and stakeholders. Housing options should be community-based, allow for freedom to come and go, and not have onerous rules.

G. Additional Program Recommendations

As explained above, the City's AFFH analysis indicates that programs are needed in the following areas: tenant protections to mitigate displacement, environmental justice, and programs to increase opportunities to preserve affordability via innovating community ownership models.

The City's Housing Element programs do not address tenant protections – which are critical to ensuring that existing residents can continue to live in their homes. Moreover, community members have identified such protections as a major issue. For example, the Stockton Housing Justice Coalition held an event on May 3, 2020 in which a tenant bill of rights, right to counsel, strong just cause protections, and universal income for renters were indicated as needed policies. Further, ending tenant harassment and discrimination as well as rent stabilization policies are also critical to mitigating displacement. We urge the City to include a tenant protection program committing to the creation of such policies.

With regard to environmental justice, the City should both ensure a dispersal of sites so that neighborhoods with the highest pollution burdens are not the location of most future building, while also creating a remediation program to seek funding for site remediation. The City should also include EJ policies that specifically address the needs of the elderly, people with disabilities, and people with chronic respiratory conditions including establishing a program to distribute air conditioning to these vulnerable populations. For example, the City could identify sources of funds that prioritize elderly residents and residents with disabilities access to in-home HEPA air filters at little or no costs. Furthermore, the City should explore an EJ policy, similar to Los Angeles County's Green Zones Ordinance, to create air pollution buffers to prevent the future zoning of residences, schools, childcare facilities, elderly care facilities, parks, and health care facilities away from heavy industrial areas.

In addition to these recommendations, community members have identified others that the City should consider. For example, at the May 3, 2020, Stockton Housing Justice Coalition community meeting, City residents suggested: a renters' right to counsel; adoption of a tenants' bill of rights; repurposing vacant buildings, e.g., those downtown, for affordable housing; the City's acquisition of land for development of lower income housing; extending just cause eviction protections to single family homes; and universal basic income for renters. These are all appropriate and valid program considerations for the housing element that would also affirmatively further fair housing.

Commented [MD32]: The City will explore additional performance standards with the Development Code update in 2023.

Commented [GU33]: Revisions have been made to Program 28 in the Policy Document to address this comment

Increasingly, jurisdictions are creating programs to preserve affordability through community-based models such as promoting community land trusts, developing tenant opportunity to purchase ordinances, and land banking. We urge Stockton to do the same in order to create long-term community-led affordability.

IV. Conclusion

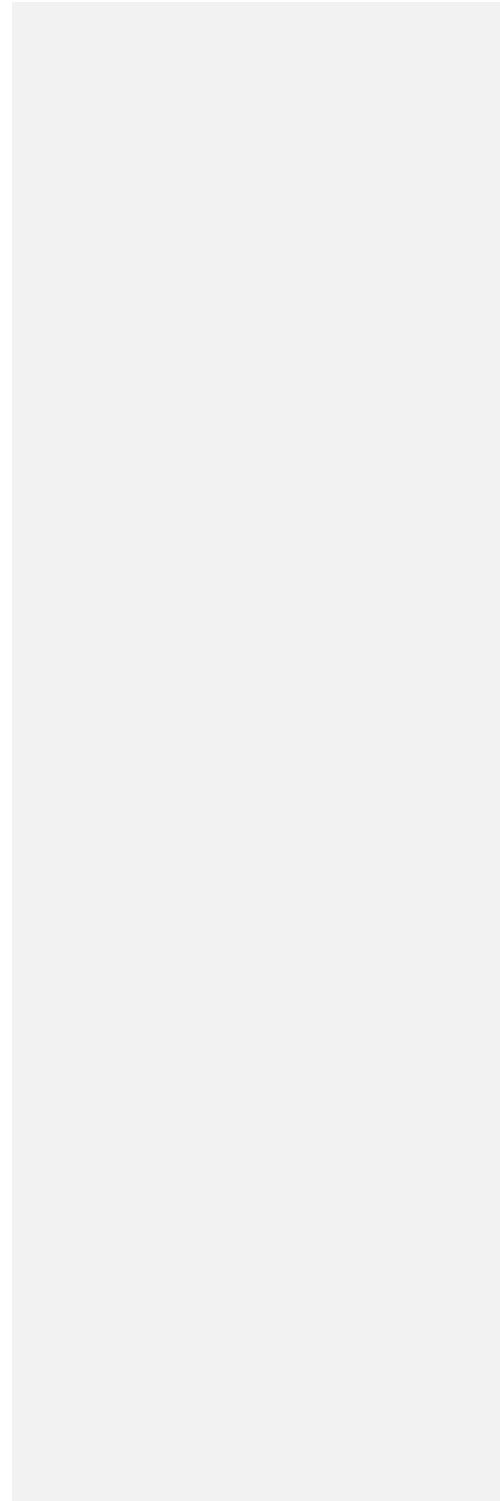
DRC submits these initial comments and recommendations, but plans to supplement these in the coming weeks. Please reach out to DRC at (619)814-8501 if we can be of any assistance as the Planning Department considers these recommendations and comments.

Thanks,



Nichole Mendoza
Senior Attorney
Civil Rights Practice Group
Disability Rights California

Attachment A



Stockton 6th Cycle Housing Element

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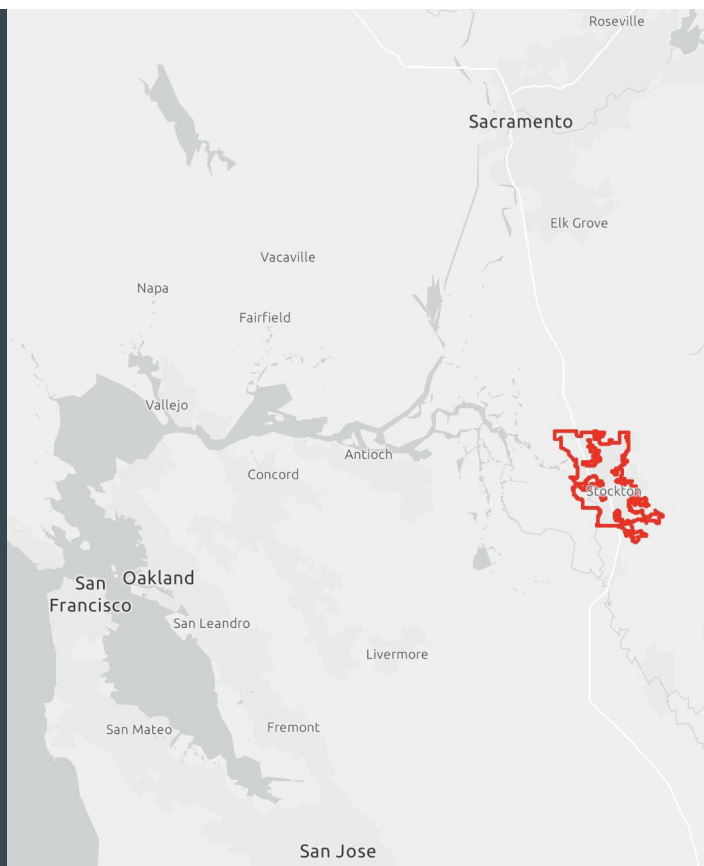
Bailey Schweitzer, Weiyang Tang, Joann Martinez

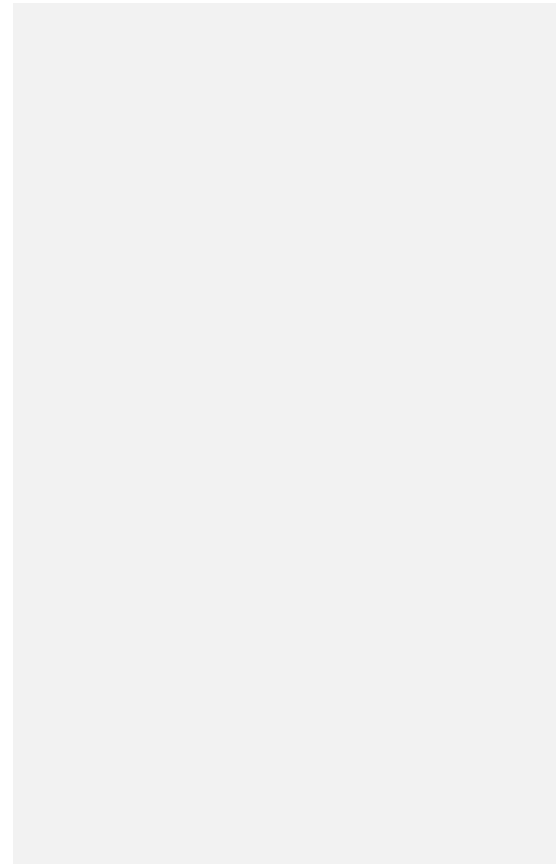
Table of contents

1. Overview of Stockton
2. Stockton's Housing Element Timeline & RHNA Allocation
3. Alleviating Patterns of Racial and Income Segregation
4. Overlapping RHNA Inventory and Polluted Neighborhoods
5. Commercial Zoning
6. Summary
7. Recommendations

Overview of Stockton, CA

- Medium-sized city of 322,000
- Located in the Central Valley, 80mi east of Berkeley
- Racially diverse - plurality Latinx
- Median HH income of \$58,393

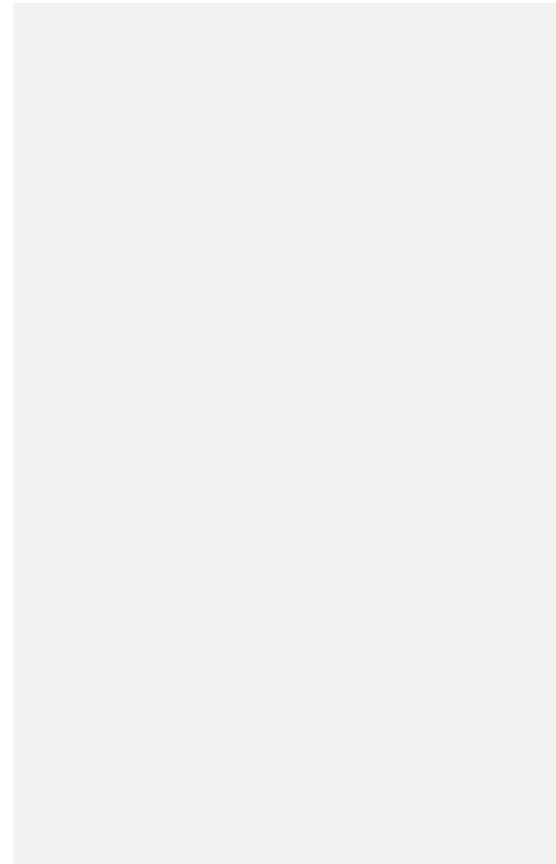




Housing Market Conditions

- 50% owner-occupied
- 72% single family
- Despite a significantly more affordable housing market than CA, it has similar levels of housing burden





Stockton's 6th Cycle Housing Element Timeline

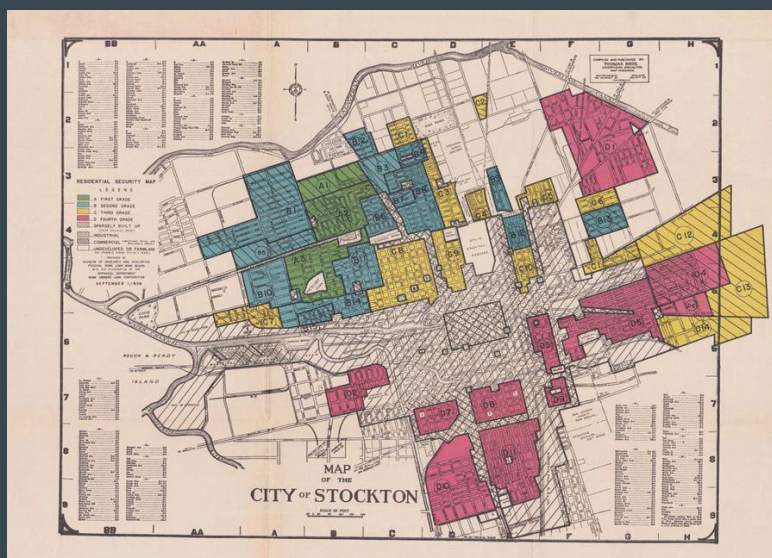
- Stockton's 6th Cycle Housing Element isn't due to HCD until December 2023
- As of December 2022, they released a preliminary map of RHNA sites
- Focused on advising the city on how to create a compliant housing element that affirmatively furthers fair housing per AB 686

Draft Housing Element Sites Inventory

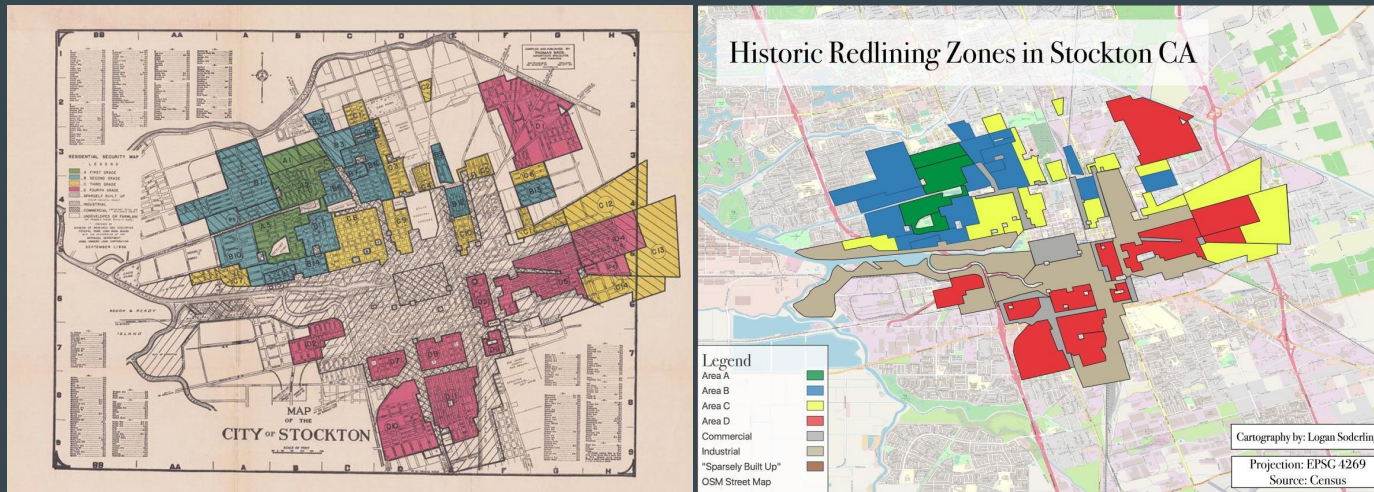
Income Group	RHNA	Entitled Projects	Sites*	Total Capacity	Surplus
Lower Income (<80% AMI)	4,013	0	5,273	5,273	1,260
Moderate Income (81%-120% of Median Income)	2,587	2,050	2,193	4,243	1,656
Above Moderate Income (>120% of Median Income)	6,072	11,620	2,177	13,797	7,725
TOTAL	12,672	13,670	9,643	23,313	10,641

*573 acres

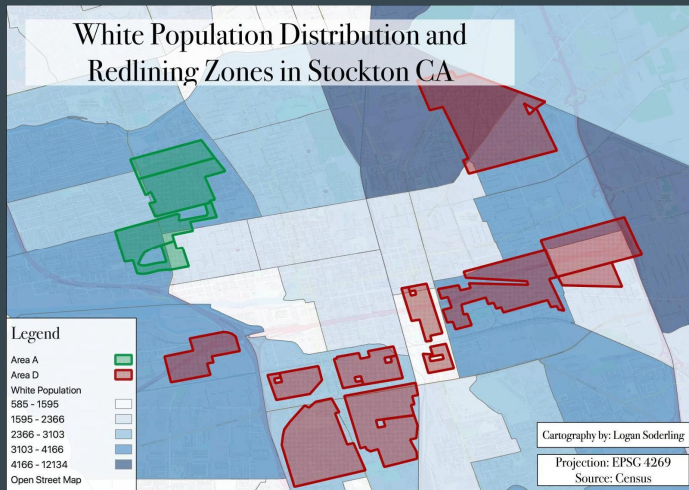
Alleviating Patterns of Racial and Income Segregation



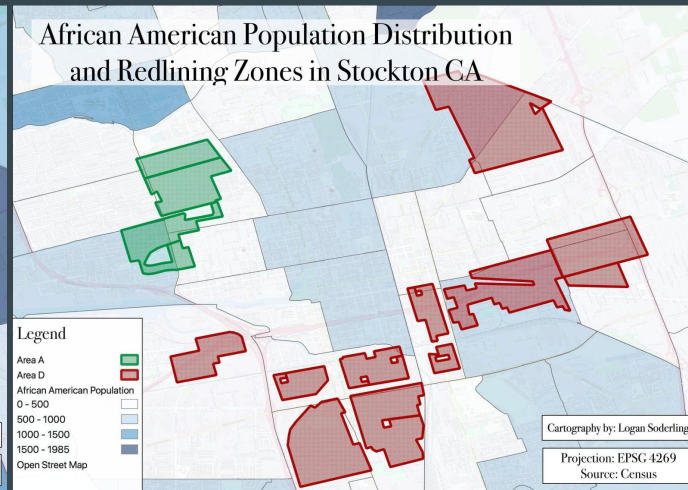
Alleviating Patterns of Racial and Income Segregation



Redlining Archives of California's Exclusionary Spaces:

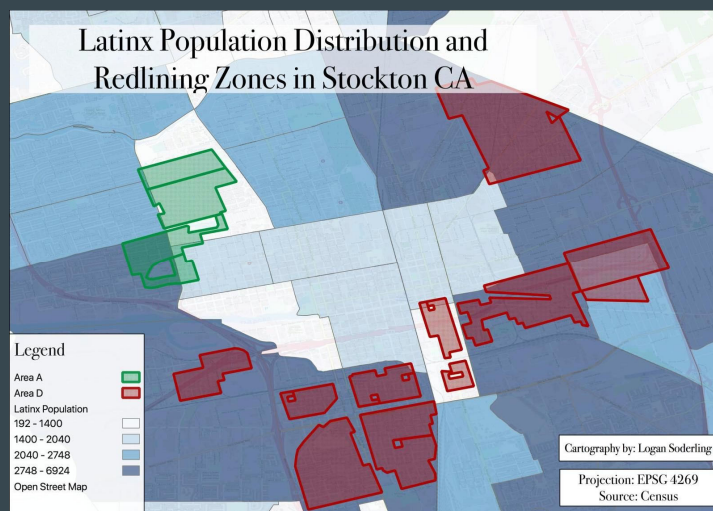


White Pop. and Redlining



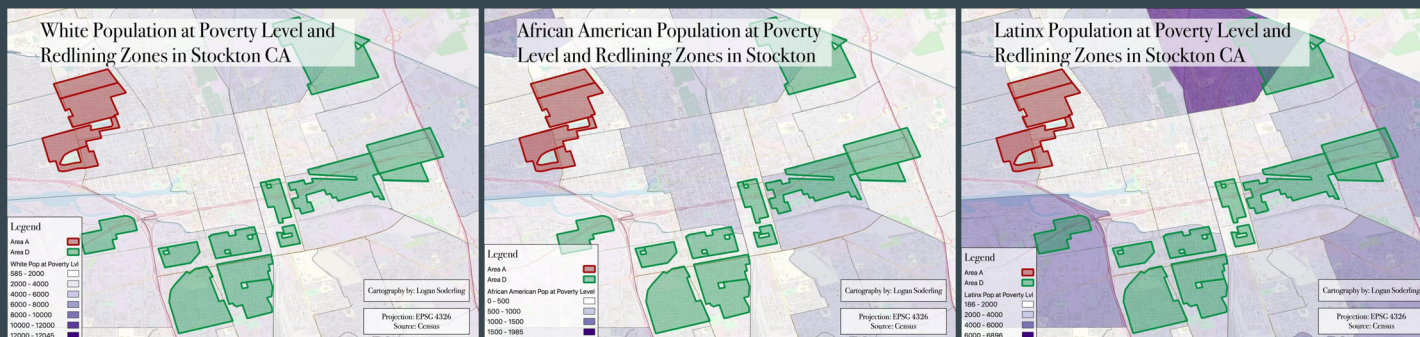
African American Pop. and Redlining

Redlining Archives of California's Exclusionary Spaces:



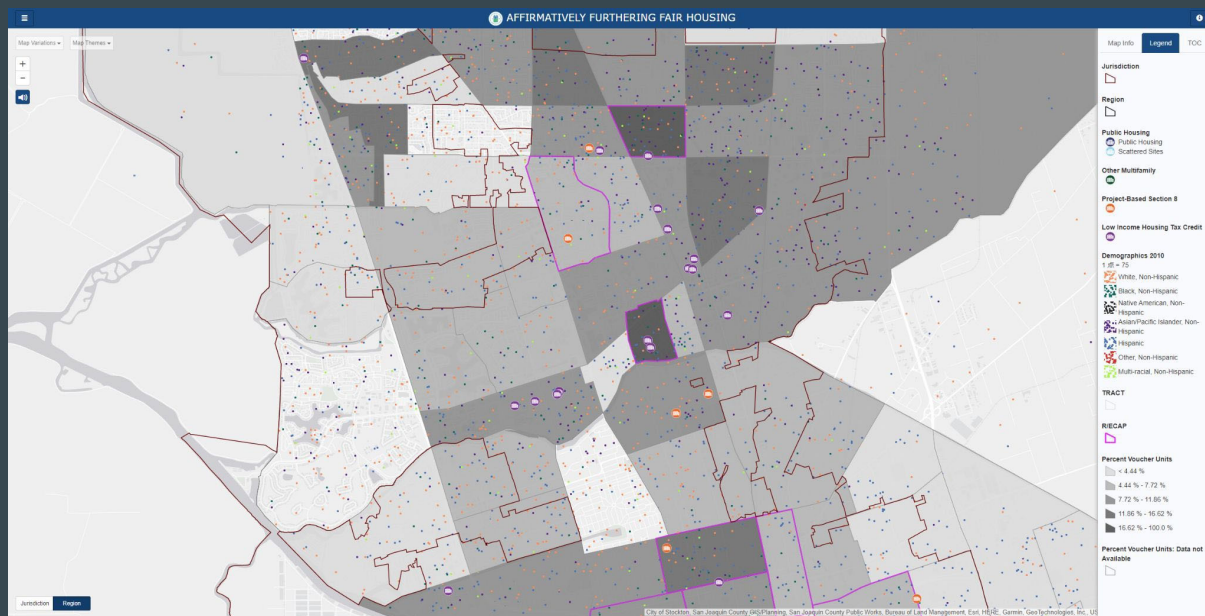
Latino Pop. and Redlining

Redlining Archives of California's Exclusionary Spaces:



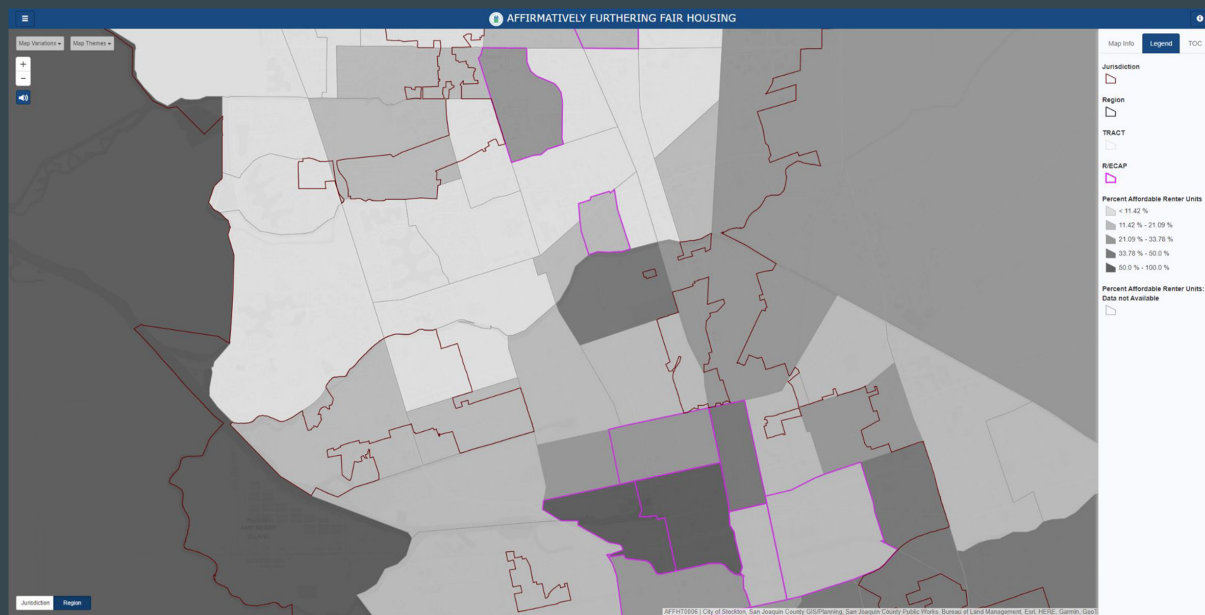
Race Poverty and Redlining

AFFH Data From HUD



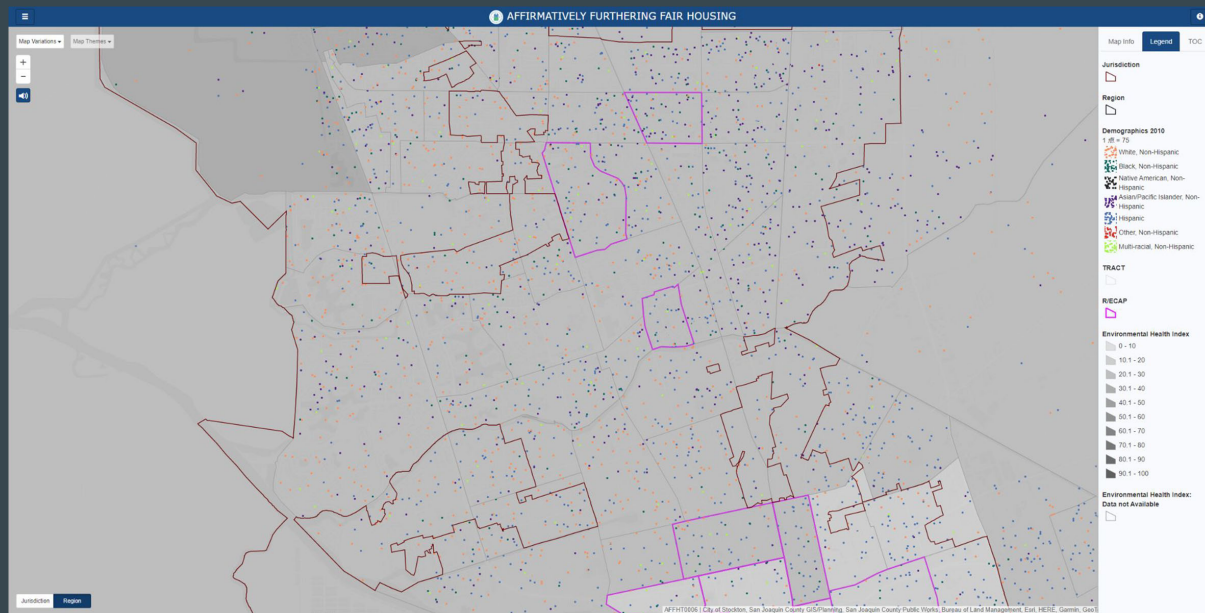
Publicly Supported Housing and Race/Ethnicity

AFFH Data From HUD



Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

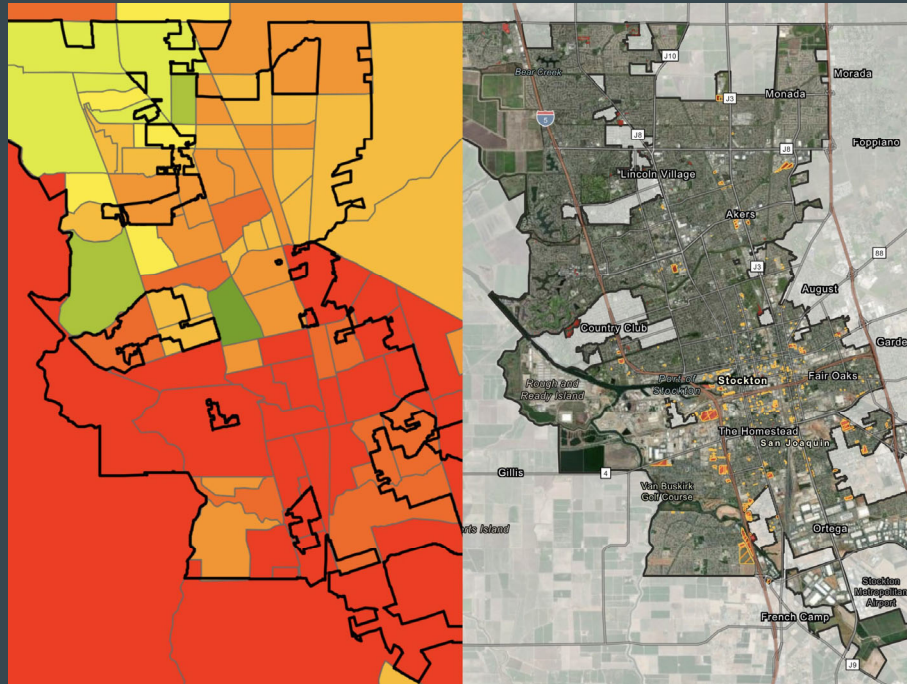
AFFH Data From HUD



Demographics and Environmental Health

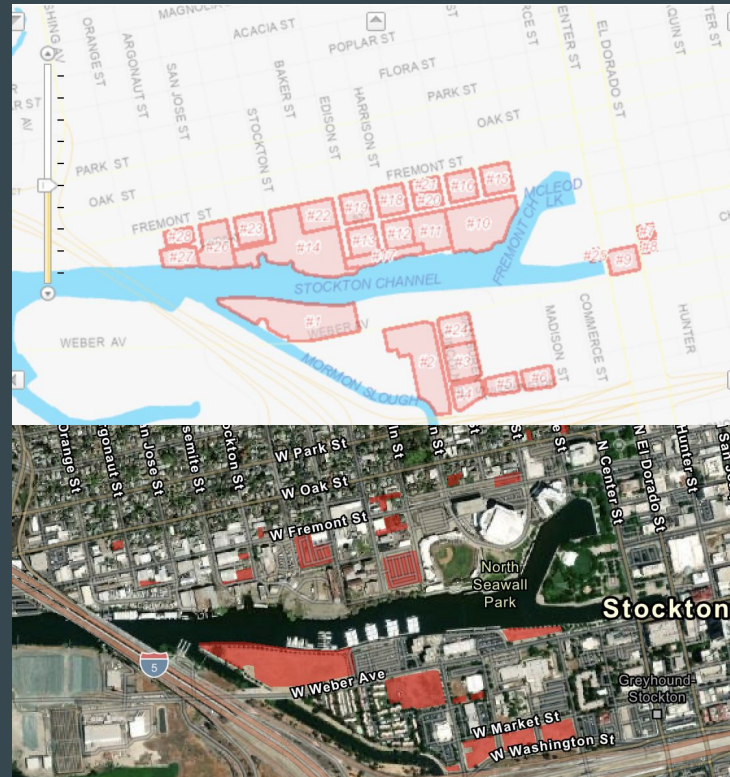
RHNA Site Selection and Polluted Neighborhoods

- Most sites are located in neighborhoods CalEnviroScreen 4.0 considers heavily polluted and highly disadvantaged
- Unclear number of units they expect for selected sites



Stockton Brownfields

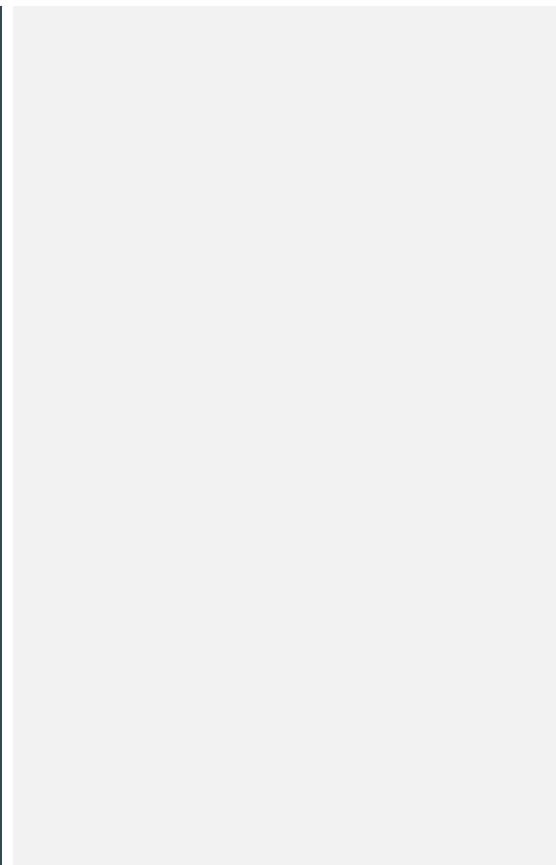
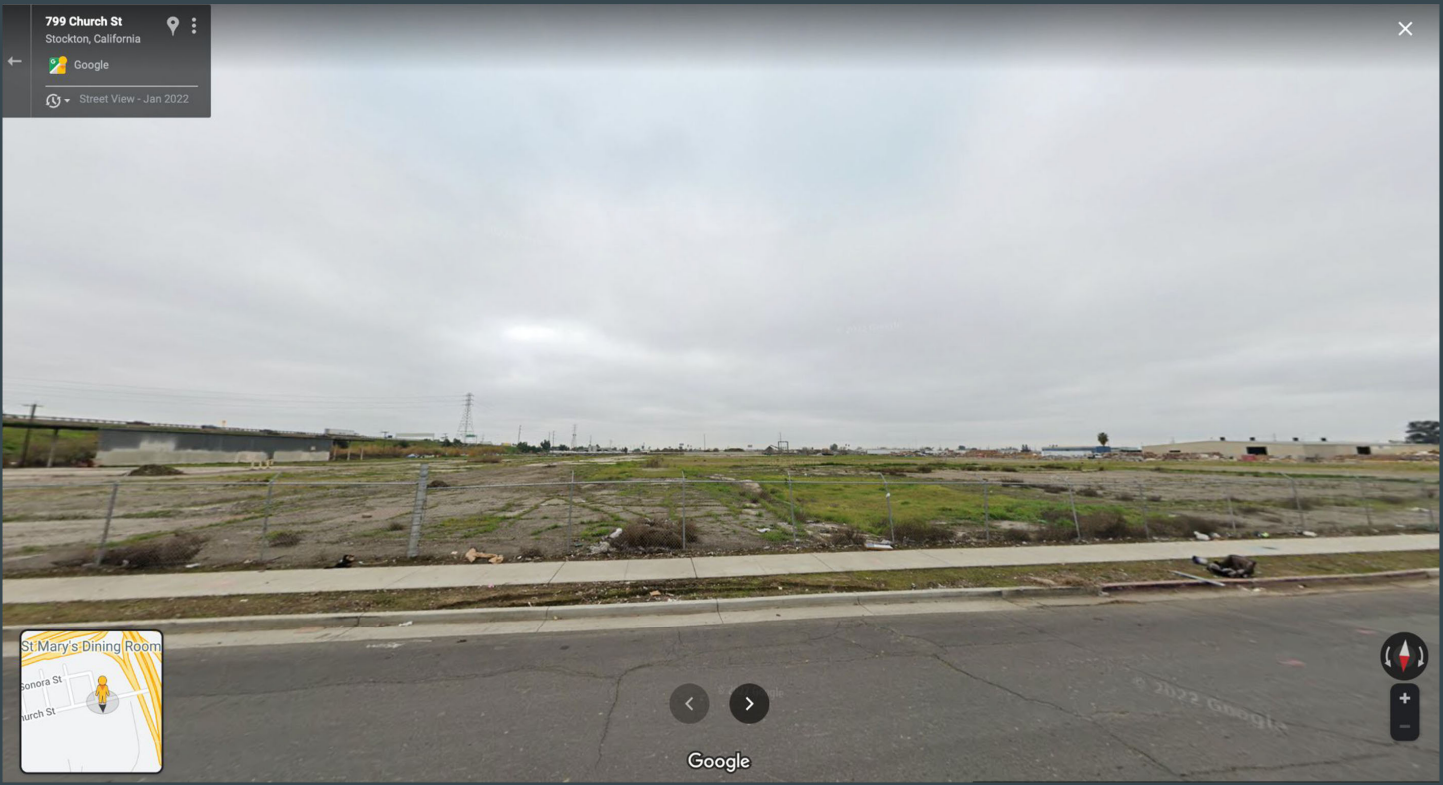
- EPA awarded Stockton a \$600,000 Brownfield Assessment Grant
- City appropriated funds through September 2021
- Conducted an assessment of redeveloping the industrial waterfront
- City is actively recruiting developers
 - Local financial assistance is unclear



Example Site: Overlapping Clean-up and RHNA Inventory Site

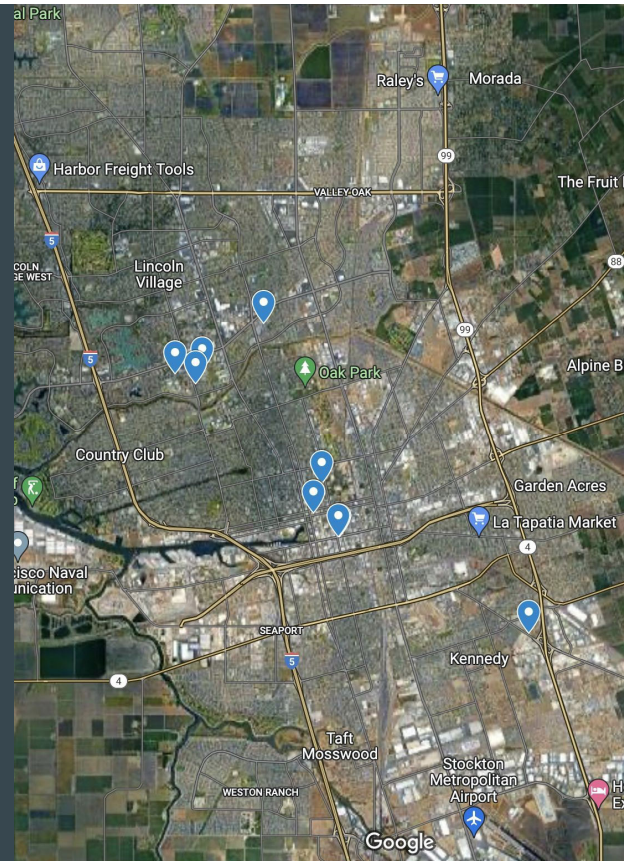
- 39.72 acres
- Overlaps clean-up site
- Surrounded on all sides by highways and rail
- Located adjacent to the I5 and highway 4 interchange and abuts rail
- Development unlikely without local financial assistance





5th Cycle Housing Element Deed Restricted Affordable Housing

- Constructed and approved deed restricted affordable housing between January 2014 and December 2023
- Sites are located across the city in less polluted areas
- Promising for 6th cycle



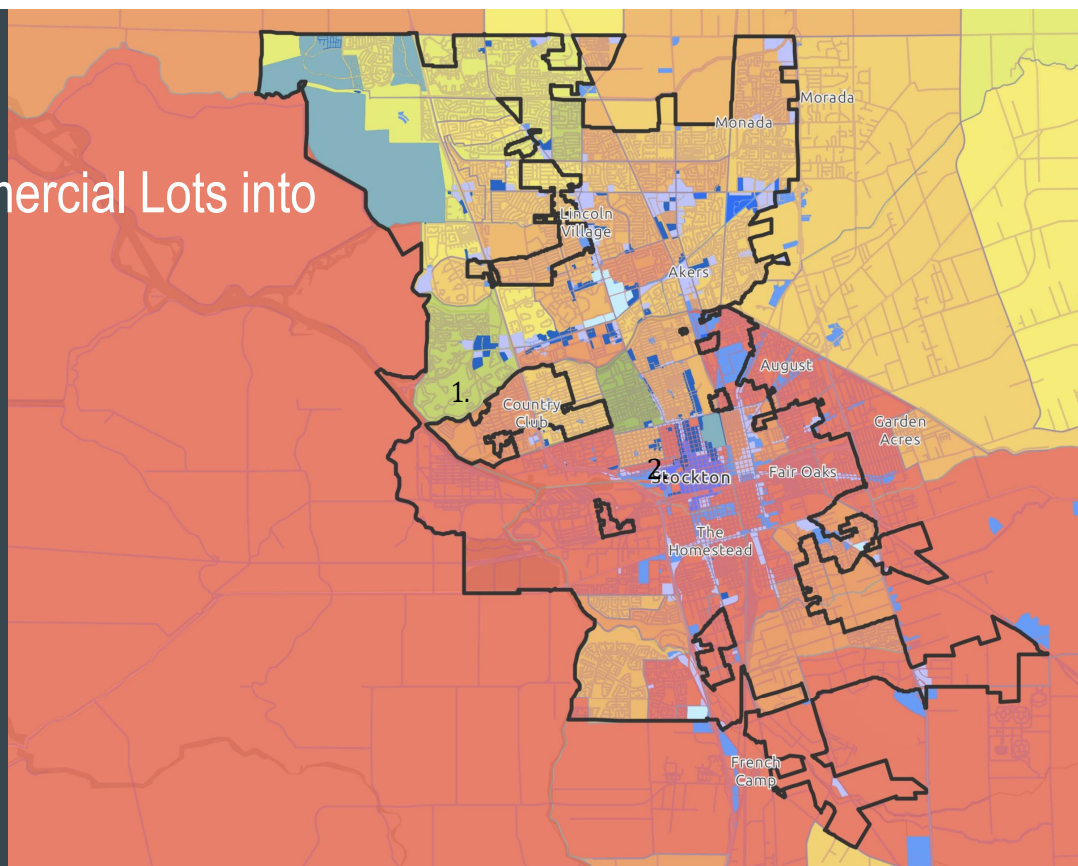
Incorporate Commercial Lots into RHNA Inventory

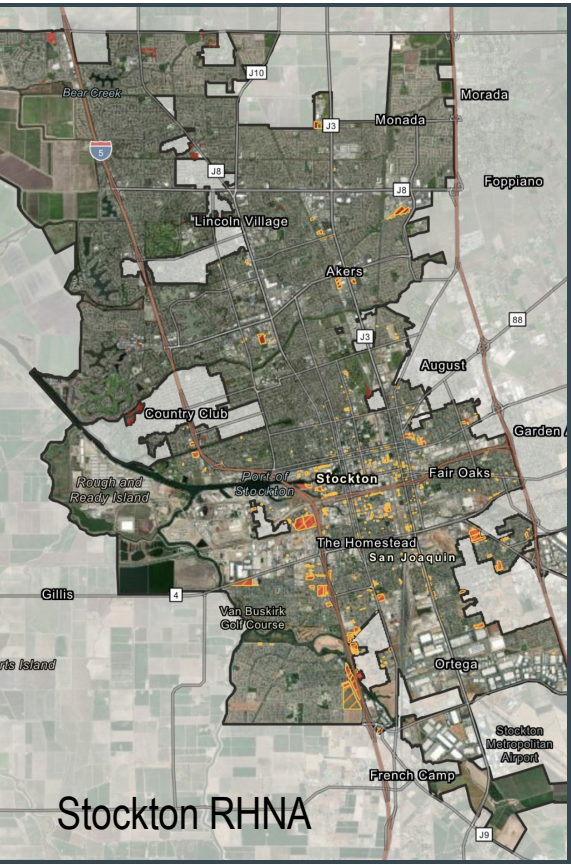
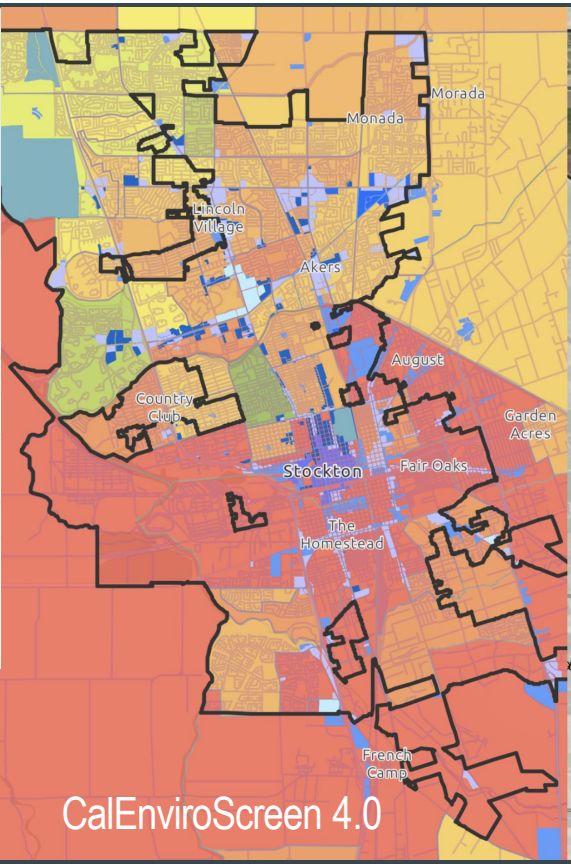
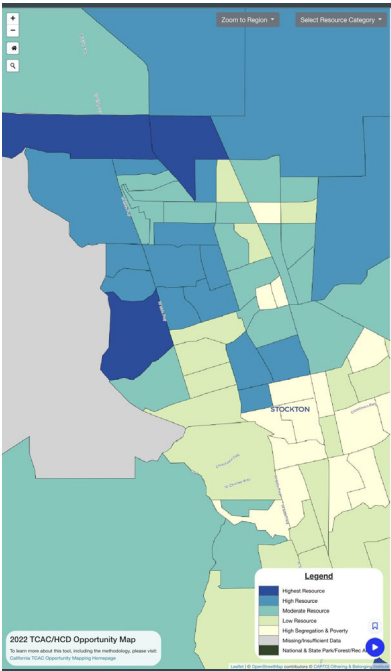
Case Study Area 1:

Brookside March Lane

Case Study Area 2:

Miracle Mile





2022 TCAC/HCD Opportunity Map

CalEnviroScreen 4.0

Stockton RHNA

Case Study Area 1: Brookside March Lane

3404 Shadowbrook Dr.

APN 11628002

Acres 1.20; Sq. Ft. 52,008.99



Case Study Area 2: Miracle Mile

A.

1828 Pacific Ave

APN 13702042

Acres 0.69 Sq. Ft. 30,795.91

B.

2402 PACIFIC AV

APN 12506001

Acres 0.13 Sq. Ft. 6,073.93



Summary

- Far too soon to tell what Stockton's housing element will look like
- Stockton will have met its moderate and high-income RHNA allocation through entitled projects
- Redlining has lasting implications
- Sites concentrated in distressed and high polluted neighborhoods

Recommendations

- 1) Future stages of site selection must seriously consider high opportunity communities
- 2) The large site located near downtown should receive local financial assistance if the city wants to actually build there
- 3) Incorporate environmental justice into housing element

Recommendations

- 4) Incorporate unpolluted commercial zones, namely Miracle Mile & Brookside March Lane, into element
- 5) Government should not just focus on investing on North Stockton. South of the crosstown freeway also need some attention.
- 6) City should stop subsidizing unprofitable public golf courses in north Stockton and put money toward affordable housing fund.

QUESTIONS?

HOUSING

This main element is divided into three sections:

- Introduction to the Policy Document
- Goals and Policies
- Implementation Programs and Quantified Objectives

INTRODUCTION TO THE POLICY DOCUMENT

Under California law, ~~the a~~ housing element must include the community's goals, policies, quantified objectives, and housing programs for the maintenance, improvement, and development of housing.

This Housing Element includes nine goal statements. Under each goal statement are policies that amplify the goal statement. Implementation programs are listed after the policies and briefly describe the proposed action, ~~the~~ City departments with primary responsibility for carrying out the program, ~~the~~ funding source(s), and ~~the~~ time frame for accomplishing the program.

The following definitions describe the nature of the statements of goals, policies, implementation programs, and quantified objectives as they are used in the Housing Element Policy Document:

- **Goal:** Ultimate purpose of an effort stated in a way that is general in nature and immeasurable.
- **Policy:** Specific statement guiding action and implying clear commitment.
- **Implementation Program:** An action, procedure, program, or technique that carries out policy. Implementation programs also specify primary responsibility for carrying out the action and an estimated time frame for its accomplishment. The time frame indicates the fiscal year in which the activity is scheduled to be completed. These time frames are general guidelines and may be adjusted based on City staffing and budgetary considerations.
- **Quantified Objective:** The number of housing units that the City expects to be constructed, conserved, or rehabilitated, or the number of households the City expects will be assisted through Housing Element programs based on available resources and general market conditions during the time frame of the Housing Element. Housing element law recognizes that in developing housing policies and programs, identified housing needs may exceed available resources and the community's ability to satisfy these needs. The quantified objectives of a housing element, therefore, need not be identical to the identified housing need, but should establish the

maximum number of housing units that can be constructed, rehabilitated, and conserved, or households assisted over an eight-year time frame.

GOAL HE-1 AND ASSOCIATED POLICIES

GOAL HE-1: INCREASE HOUSING PRODUCTION AND ENSURE ADEQUATE LAND FOR ALL HOUSING TYPES AND INCOME LEVELS. INCREASE HOUSING PRODUCTION BY ENSURING ~~THE~~ ADEQUATE SITES FOR HOUSING OF ALL TYPES AND INCOMES, RECOGNIZING THE IMPORTANCE OF A JOBS-TO-HOUSING RATIO THAT ENCOURAGES LIVING AND WORKING IN OUR COMMUNITY.

Policy HE-1.1 Availability of Land: The City shall maintain sufficient designated and zoned vacant and underutilized sites for housing to achieve a mix of single-family and multifamily development that will accommodate anticipated population growth and the housing needs established in the City's regional housing needs allocation (RHNA) of 12,673 units (1,232 extremely low, 1,233 very low, 1,548 low, 2,572 moderate, 6,088 above moderate). In addition to the Housing Capacity sites needed toward RHNA, the Housing Action Plan (HAP) shall explore additional areas that could potentially support housing. This could include underutilized properties, underutilized buildings, and unincorporated areas. This surplus shall be used to maintain the City's Pro-Housing Designation ~~that~~ which requires the City to maintain 130-percent surplus over the RHNA requirement. (Programs 1, 2 and 3)

Policy HE-1.2 Avoid Downzoning: The City shall not downzone parcels identified in the Housing Element inventory unless they are replaced concurrently by comparably zoned land elsewhere within the City, or the City makes the determination that there are still adequate sites in the inventory to meet the remaining regional housing needs allocation. (Program 1)

Policy HE-1.3 Parcel Consolidation: The City shall encourage the splitting or consolidation of parcels to facilitate more effective residential development and continue to process these requests ministerially. (Program 8)

Policy HE-1.4 Infrastructure and Public Facilities to Support Residential Development: The City shall take into consideration where housing is planned or likely to be built when preparing plans for capital improvements to expand or improve infrastructure and public facilities that support new residential development and ensure adequate services. (Program 4)

Policy HE-1.5 Higher Residential Densities: The City shall encourage residential densities at the high end of the allowable density range to make more efficient use of land and public facilities and services, and ~~to provide more affordable housing opportunities for all residents~~ expand programs that would allow densities increase beyond the maximum allowable density range for projects that adhere to Housing Element policies. This include the existing 100-percent Density Bonus program and new programs as part of the Development Code Overhaul. (Program 1 and 18)

Policy HE-1.6 Residential Mixed-Use Development: The City shall encourage the development of mixed-use residential-office and residential-retail projects. (Programs 2, 5, and 7)

Policy HE-1.7 Housing Variety: The City shall encourage and provide opportunities for a variety of housing types that provide market-rate and affordable housing opportunities and promote balanced mixed-income neighborhoods. The Development Code Update shall amend zoning to allow more housing variety and higher densities in various residential and commercial zones. (Program 5)

Policy HE-1.8 Accessory Dwelling Units in New and Existing Developments: The City shall encourage the development of accessory dwelling units within new and existing residential development and single-family neighborhoods. (Program 6)

Policy HE-1.9 Infill Development Targets: In an effort to meet the infill target of 4,400 new units in the Greater Downtown Area, the City shall promote infill development within the Downtown and Greater Downtown areas through incentives such as less restrictive height limits, less restrictive setback and parking requirements, subsidies, infrastructure improvements, and streamlined permitting process. (Programs 2 and 7)

Policy HE-1.10 Balanced Growth: The City shall ensure that development at the city's outskirts, particularly residential or mixed-use development, does not occur in a manner that is out of balance with infill development. (Program 7)

Policy HE-1.11 Transit Oriented Development: The City shall encourage higher-density residential uses and mixed-use development to locate near main transportation routes to offer an alternative means of transportation to employment centers, schools, shopping, and recreational facilities and to promote walking and biking. Consistent with the General Plan policies, the City will establish Transit Oriented Development overlays as part of the Development Code Update. (Programs 2, 5 and 7)

Policy HE-1.12 Adaptive Reuse: The City shall encourage the adaptive reuse of existing buildings for residential and mixed use. The HAP shall outline potential reuse sites in the downtown area and explore potential partnerships and resources to retrofit chronically vacant buildings for residential and mixed uses. (Program 2)

Policy HE-1.13 Public/Private Partnerships: The City shall strive to establish public-private partnerships for the revitalization of blighted areas. The HAP shall explore these partnerships and make recommendations on where these partnerships should be achieved to address existing barriers to new housing. (Program 5)

Policy HE-1.14 Pursue State Funding for Infill: The City shall pursue State funding to support infill development in the Downtown and Greater Downtown areas. (Program 7)

Policy HE-1.15 Improve the Downtown Image: The City shall strive to reshape the perception of Downtown Stockton as a livable city center. (Program 2)

Policy HE-1.16 Integrated Affordable Housing: The City shall encourage the integration of sites for affordable housing throughout the residentially designated areas of the city and avoid concentration of low-income housing units. (Programs 5 and 7)

Policy HE-1.17 Mixed Income Housing: The City shall encourage mixed income developments to create more economically diverse neighborhoods. (Programs 5 and 6)

Policy HE-1.18 Facilities and Services: The City shall provide, maintain, and upgrade, as necessary, community facilities and municipal services in support of residential development. (Program 4 and 29)

GOAL HE-1 IMPLEMENTATION PROGRAMS

Program 1. Adequate Sites Monitoring and No Net Loss. As part of the annual progress report on the Housing Element to the Sstate, the City shall update its vacant land inventory, including an updated inventory of potential infill sites (smaller parcels). The City shall make the updated inventory available to the public and development community via the City's website. For any project approval on a Housing Element site for fewer housing units/or at lower densities than assumed in the Housing Element, the City shall determine whether there is still adequate capacity to meet the remaining housing need, consistent with "no net loss" state law.

Quantified Objectives: Continue to maintain sufficient sites to address 12,673 units.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Economic Development Department

Time Frame: Update inventory annually as part of the Housing Element Annual Progress Report and assess “no net loss” as projects come forward on Housing Element sites.

Program 2. Downtown Implementation: The City shall continue to implement measures to enable development of 4,400 residential units in the Greater Downtown Area by 2035, as laid out in the Climate Action Plan and General Plan. This will include strategies and regulations anticipated as part of the Comprehensive Development Code Update and Housing Action Plan (HAP) currently underway. The HAP shall specifically explore the following topics:

- Sufficient infrastructure capacity and estimated costs for to develop all income types and densities.
- Market analysis to explore the opportunities and constraints of new housing in the greater downtown area.
- Cost gap analysis to better understand financial constraints in adaptive reuse of unused commercial buildings in the downtown area.
- Explore existing and potential funding mechanisms for infrastructure and building retrofitting.
- Explore potential partnerships for new housing and supportive services for all income types.

Quantified Objectives: 4,400 residential units in the Greater Downtown Area by 2040.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Economic Development Department

Time Frame: Adopt Comprehensive Development Code Update and HAP by ~~end of 2023 or early 2024~~; and annually thereafter to identify any additional strategies to address ~~the settlement agreement~~ General Plan goals.

Program 3. Sites Included in Previous Housing Elements: As specified in Appendix A, some vacant parcels have been included in the land inventories of the 5th CycleRound and 4th CycleRound Stockton Housing Elements as suitable to address the City’s RHNA allocation. Per Government Code Section 65583.2(c), to continue to include these parcels in that portion of the land inventory for this 6th CycleRound Housing Element, the City will commit to update all required Development Code and General Plan provisions to allow projects that have at least 20 percent affordable units (extremely low, very low, or low) without discretionary review or “by right” (Government Code Section 65583.2 (i)).

Quantified Objectives: 437 residential units on 16 repeat sites identified in Appendix A that don’t already allow residential development by right.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Update Development Code and, if needed, Land Use Element by December 31, 2026

Program 4. Public Facilities Repair and Replacement: Through implementation of the HUD Consolidated Plan, and upon funding availability, the City shall continue to identify and target low-income neighborhoods for the expansion of existing facilities/infrastructure, replacement of deteriorating facilities, and construction of new facilities/infrastructure to increase quality of life for Stockton residents. To help identify these neighborhoods and facilities, the City shall update its Housing Conditions survey to better direct staff time and resources in identifying areas and facilities that could benefit the most.

Quantified Objectives: 5 public facility/ infrastructure projects

Potential Funding: CDBG

Who Is Responsible: Economic Development Department, [Community Development](#)

Time Frame: Annually

Program 5. Housing and Neighborhood Action Plans: The City is currently preparing a Housing Action Plan (HAP) to provide a guidebook with information to interested developers and property owners about residential opportunities in the city. This plan will include the top priority sites the City has identified as “shovel-ready” for housing development. Selection of the priority sites will be based on financial feasibility analysis and policy goals. The HAP will be marketed and provided to potential developers upon completion. The City is also preparing Neighborhood Action Plans for three (3) neighborhoods - South Airport Way Corridor, Little Manila/Gleason Park, and Cabral/East Cabral. The plans are focusing on eliminating barriers to housing construction and will result in recommended actions and strategies for each of the three-Neighborhood Areas. - In particular, the Neighborhood Action Plans for Cabral Station Area and Little Manila/Gleason Park neighborhoods will serve as a tool to improve conditions and opportunities in these two primarily lower-income areas.

Quantified Objectives: [Permit](#) 1,000 residential units

Potential Funding: LEAP, REAP, General Fund

Who Is Responsible: Community Development Department

Time Frame: Late 2023

Program 6. Accessory Dwelling Units: The City will update its ADU regulations as needed throughout the planning period to address changes to State law. The City will encourage the construction of ADUs throughout the city through the following actions. [These actions, which](#) are aimed at providing an increased supply of affordable units and therefore help reduce displacement risk for low-income households resulting from housing overpayment and facilitate mixed-income neighborhoods:

- Provide guidance and educational materials for building ADUs on the City's website, including permitting procedures and construction resources. The City already has preapproved/[permit ready](#) ADU plans available for use by homeowners. Additionally, the City will present homeowner associations with information about the community and neighborhood benefits of ADUs and inform them that covenants, conditions, and restrictions (CC&Rs) prohibiting ADUs are contrary to State law.
- Proactively advertise the benefits of ADUs by distributing multilingual informational materials in areas of high opportunity and limited rental opportunities to increase mobility for low-income households. [This will be achieved,](#) by posting flyers in community gathering places and providing [flyers](#) to community groups and homeowners' associations at least annually.
- Monitor ADU production and affordability every other year and adjust or expand the focus of the education and outreach efforts. If needed, identify additional sites to accommodate the unmet portion of the lower-income RHNA.
- [Apply annually, or as grants are available, for funding to provide incentives for homeowners to construct ADUs.](#)
- [Work with regional and local agencies to update the existing ADUs pre-approved construction plans and explore more additional plans that reflect the housing market, cost constraints, and typical residential lots that could support them.](#)

Quantified Objectives: Approve 180 ADUs over the course of the planning period, targeting areas of high opportunity, specifically the following neighborhoods - Brookside/Country Club, Weston Ranch, Eight Mile/Bear Creek, Midtown around the University of the Pacific (between I-5 and “Miracle Mile”/Pacific Avenue), western Upper Hammer/Thornton Rd, and eastern Morada/Holman.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Starting in November 2024, evaluate the consistency of Stockton’s ADU regulations with [State law](#) and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and [identify additional site capacity, if needed, by December 2026](#). Apply annually, [or as grants are available](#), for funding to support ADU incentives.

Program 7. Infill Strategy: The City shall continue to implement the Downtown Infrastructure Infill Incentive Program or explore other financing strategies to facilitate the development of infill projects in the Downtown and Greater Downtown areas. The program identifies actions and incentives to promote infill development, including brownfield remediation. The Housing Action Plan, currently underway, will identify additional recommended strategies [that could include:](#)

- [Identification of potential infill properties, both vacant and underutilized.](#)
- [Explore the practicality and feasibility of pre-approved design review and/or construction plans.](#)
- [Increase waivers for development standards that would restrict buildout of a small infill lot. This could include reduced setbacks, height and size increases, and an increase in the amount of waiver by the Community Development Director.](#)
- [Density increases allowances for infill projects to exceed the maximum density requirement through an existing 100-percent Density Bonus or through a new process for market rate housing.](#)
- ~~As needed, Additional strategies and incentives will be considered and to plan and fund implemented and could include allowing less restrictive development standards; planning in infrastructure improvements.~~
- ~~and s~~ [Ways to further streamline the ministerial design review permitting process for infill development.](#)

Quantified Objectives: 100 extremely ~~low income~~[low-income](#) units and 150 other lower income units; funding for 10 brownfield sites minimum

Potential Funding: General Fund

Who Is Responsible: Economic Development Department, Community Development Department

Time Frame: Adopt Housing Action Plan by the end of 2023. Implement Housing Action Plan strategies by 2025. Annually, beginning in 2026, identify any additional strategies needed to address overpayment and reduce displacement risk and implement them within 2 years of identification.

Program 8. Infill Site Assembly: The City shall actively work with local property owners and developers to assist in the consolidation and assembly of small infill parcels for residential projects, particularly as related to parcels listed in the sites inventory and parcels with multiple owners. The City shall continue to process lot mergers ministerially and shall offer incentives, such as expedited processing, in addition to the incentives already offered to infill development. The City is updating infill requirements [in the Development Code](#) as part of the Comprehensive Development Code Update. The City is also working on mapping potential infill sites that are vacant and ready for development as part of the Housing Action Plan, current underway (see Programs 5 and 15). The City shall also conduct meetings or some other type of [public](#) outreach to connect owners of properties with potential developers.

Quantified Objectives: Facilitate lot consolidation to produce sites for 2,300 moderate and above moderate residential units

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame: Ongoing, as projects come forward; establish program to connect property owners and developers by June 2026.

GOAL HE-2 AND ASSOCIATED POLICIES

GOAL HE-2: PROVIDE HIGH QUALITY HOUSING FOR ALL INCOME GROUPS. ENCOURAGE AND PROMOTE THE CONSTRUCTION OF AFFORDABLE AND MARKET RATE HOUSING TO MEET CITY'S HOUSING NEEDS AND PROMOTE DEVELOPMENTS THAT CONSERVE ENERGY.

Policy HE-2.1 Pursue Funding: The City shall pursue Ffederal and State housing assistance programs designed to help meet the needs of extremely low-, very low-, low-, and moderate-income households. (Program 10)

Policy HE-2.2 Networking and Collaboration: The City shall continue to collaborate with public agencies and private and nonprofit entities to access State, Ffederal, and other sources of funding to provide housing to lower- and moderate-income households. (Program 9)

Policy HE-2.3 Affordable Housing Incentives: The City shall explore incentives, bonuses, and flexibility in standards and requirements in the Development Code that could benefit affordable housing development, such as density bonuses, flexible development standards, and deferred payment of fees. (Programs 5, 11 and 18)

Policy HE-2.4 Homeownership Opportunities: The City shall continue to provide opportunities for and reduce barriers to homeownership and promote financial literacy and public awareness of the various means available to become a homeowner. (Program 10)

Policy HE-2.5 Priority Sewer and Water Service for Affordable Housing: The City shall provide priority sewer and water service for developments that include lower income housing units, consistent with State law (Government Code Section 65589.7). (Program 11)

Policy HE-2.6 Energy Conservation and Waste Reduction: The City shall promote energy conservation and waste reduction in residential site planning, design, and construction. (Program 12)

Policy HE-2.7 Energy Conservation and Efficiency in City Regulations: The City shall use its review and regulatory power to enhance and expand residential energy conservation and efficiency. (Programs 12, 13, and 14)

Policy HE-2.8 Green Building Concepts: The City shall require green building concepts and processes in new residential construction and rehabilitation of existing housing consistent with State building standards and local subdivision and zoning standards. (Program 12)

Policy HE-2.9 Energy Conservation and Efficiency Programs: The City shall work with local energy providers to promote weatherization and energy conservation programs and incentives to new and existing residential developments, especially low-income households. (Programs 12, 13, and 14)

Policy HE-2.10 Green-Up Stockton: The City shall encourage voluntary residential energy efficiency assessments and retrofits for existing dwelling units. (Program 13)

GOAL HE-2 IMPLEMENTATION PROGRAMS

Program 9. Coordination with the Housing Authority of San Joaquin County: The City shall continue to work closely with the Housing Authority of San Joaquin County in providing assisted housing through the Housing Voucher Program ~~(Section 8)~~, and in providing housing and supportive services to special needs households and individuals. In addition, working with the Housing Authority, implement a Housing Choice Voucher education program to share information about the program and available incentives with rental property owners and managers as well as training on avoiding discriminatory practices based on income or other protected classes. Distribute this information at least annually to property owners and managers across the ~~C~~city, though with an emphasis on higher (moderate, high, and highest) resource areas where there are no public housing opportunities available, a disproportionately low rate of voucher usage, and high performing schools.

Quantified Objectives: Provide vouchers to 3,800 households in Stockton and assist these lower income households in accessing rental opportunities with Housing Choice Vouchers to facilitate housing mobility.

Potential Funding: General Fund

Who Is Responsible: Economic Development Department, Housing Authority of San Joaquin County

Time Frame: Ongoing; establish education program by the end of 2024 and distribute information. Then distribute information at least annually through the end of the planning period.

Program 10. State and Federal Funding: The City shall continue to apply annually for ~~F~~federal entitlement funds under the CDBG, HOME and ESG Programs, and shall pursue additional State and ~~F~~federal funding that becomes available during the planning period. The City shall continue to administer its Down Payment Assistance Program for low-income first-time homebuyers using a variety of funding sources, including CDBG and HOME funds. The program will be targeted to those buying in higher opportunity areas. The City shall support housing organizations and affordable housing developers by assisting in applications for funding, drafting letters of support and resolutions, and identifying potential sites for affordable housing. The City shall also discuss the possibility of requiring affordable units as part of development agreements when initiating discussions with applicants.

Quantified Objectives: Fund 200 extremely low-, 400 very low-, 450 low-income units; Provide down payment assistance to 75 low-income households, particularly in high opportunity areas.

Potential Funding: General Fund; CDBG, HOME, HELP, and CalHome

Who Is Responsible: Economic Development Department

Time Frame: Review funding opportunities annually; down payment assistance program is ongoing

Program 11. Priority Sewer and Water Service for Affordable Housing: The City shall include language in the development code to provide priority sewer and water service for developments that include lower income housing units, consistent with State law (Government Code Section 65589.7).

Quantified Objectives: Include in Development Code as part of Comprehensive Update~~N/A~~

Potential Funding: General Fund

Who Is Responsible: City Council, Municipal Utilities Department, Community Development Department

Time Frame: Include in Development Code as part of Comprehensive Update by ~~December 31, 2023~~early 2024

Program 12. Property Assessed Clean Energy (PACE) Program. The City shall continue to provide programs for property owners to finance the purchase and installation of infrastructure improvements to their properties with no up-front costs for: renewable energy, energy- and water-efficiency improvements, water conservation upgrades, and/or electric vehicle charging.

Quantified Objectives: Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.

Potential Funding: Property Assessed Clean Energy (PACE) financing

Who Is Responsible: Economic Development Department

Time Frame: Ongoing

Program 13. Green-Up Stockton: The City shall continue to encourage voluntary energy assessments for housing units built prior to November 1, 2002. The City shall continue to work with community services agencies and PG&E and other funding sources to identify funding and incentivize residential energy efficiency projects.

Quantified Objectives: Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Ongoing

Program 14. Weatherization Activities: The City shall advertise local weatherization programs by posting information on the City website and distributing fliers and brochures, and shall refer elderly homeowners, low-income households within certain income limits, and the general public to agencies offering weatherization programs.

Quantified Objectives: 200 units weatherized

Potential Funding: Home Energy Assistance Program HEAP

Who Is Responsible: Economic Development Department

Time Frame: Ongoing

GOAL HE-3 AND ASSOCIATED POLICIES

GOAL HE-3: REMOVE GOVERNMENTAL CONSTRAINTS. ADDRESS AND, WHERE FEASIBLE, REMOVE UNNECESSARY GOVERNMENTAL CONSTRAINTS TO THE DEVELOPMENT, IMPROVEMENT, AND MAINTENANCE OF STOCKTON'S HOUSING STOCK, AND ENCOURAGE HIGHER-DENSITY DEVELOPMENT.

Policy HE-3.1 Mitigate Governmental Constraints: The City shall strive to mitigate local governmental constraints to the development, improvement, and maintenance of housing. (Programs 15, 16, and 17)

Policy HE-3.2 Streamlined Permitting: The City shall continue to streamline the local permit review and approval processes for affordable and infill housing projects. (Programs 15, 17 and 18)

Policy HE-3.3 Application and Development Fees: The City shall strive to ensure that application and development fees do not unnecessarily constrain production of new infill and multifamily housing. (Program 16)

Policy HE-3.4 Defer Fees for Affordable Housing: The City shall continue waiving and deferring eligible fees to help offset development costs for affordable housing. (Program 16)

Policy HE-3.5 Creativity and Flexibility: The City shall allow for flexibility in the application of development standards to encourage creative and innovative housing solutions. (Program 18)

GOAL HE-3 IMPLEMENTATION PROGRAMS

Program 15. Development Code Revisions: As part of the Comprehensive Development Code Update, the City shall complete the following changes to the Development Code:

- Amend the Development Code to allow care homes for six persons or fewer in the RE zone to fully comply with State law, which requires group homes for six or fewer to be treated as a single family home.
- Amend the Development Code to allow care homes for more than six persons without a Use Permit, to comply with State law.
- State explicitly in the Development Code that 100 percent residential projects are allowed in CD, CN, and CG districts as is currently allowed in practice.
- Expand Development Code to allow residential projects in all residential and commercial zoning designations.
- Continue to permit all types of housing (single family, multi-unit, and multifamily) uses “by-right” and expand “by-right” land uses for businesses and services that support housing.
- ~~Update Use Permit findings (used for review of residential uses) to be objective.~~
- ~~Update Design Review findings to be objective.~~
- Update Design Review ~~Guidelines (subjective) to~~ Standards to increase their (objectivity).
- Amend the Development Code to allow employee housing for six persons or fewerless in the same way residential structures are allowed in zones allowing residential uses.
- Amend the Development Code to update standards for emergency shelters, including parking, minimum distance, and any other updates needed for consistency with current State law.
- Include a State-compliant definition of “family” in the Development Code.
- Amend the Development Code and possible General Plan to encourage future transitions in disadvantaged communities via new commercial/industrial zones that would remove heavy industrial uses from many of the South Stockton areas.
- Evaluate the possibility of implementing SB 10 (Planning and Zoning Law) in appropriate areas of the city.
- Per the agreements with the Department of Justice and Sierra Club, the City shall create new industrial design and operational standards that will regulate new industrial uses and buildings adjacent to residential communities.
- Explore additional community benefit options that could be included in the criteria for initiating modified and new Development Agreements. These benefits could include Inclusionary Housing requirements and fees, Community Benefit agreements, increase land dedications for future city services, and join-lease agreements for schools and civic uses.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: ~~December 31, 2023~~ Early 2024

Program 16. Fiscally Positive Impact Fees: The City’s adopted impact fees on new development or other ongoing funding mechanisms (e.g., community facilities districts) are fiscally positive to the City. The City shall continue to consider the impacts on the cost, supply, and affordability of housing and ensure that fees do not unduly constrain housing development by continuing to monitor the Residential Development Public Facilities Fees (PFFs) Exemption Program, Citywide Affordable Housing Development Public Facilities Fees Exemption Program, Greater Downtown Stockton Residential Development Public Facilities Fees Exemption Program, and Stockton Economic Stimulus Plan (SESP) fee reduction components to ensure they

are addressing potential constraints. The City ~~is considering modifying the SESP program to only address multi-family projects~~ will explore consider possible revisions to the aforementioned programs and explore additional programs as part of the HAP and Public Facilities Fees (PFFs) updates that are occurring in 2023/2024-.

Quantified Objectives: Provide exemptions and reductions to 200 housing units to reduce overpayment for housing costs and reduce displacement risk.

Potential Funding: General Fund

Who Is Responsible: Community Development Department, Public Works Department, ~~Administrative Services Department~~

Time Frame: Annually, evaluate exemptions provided and determine whether all constraints to housing development associated with impact fees or other funding mechanisms are sufficiently addressed. If it is found that they are not being addressed, modifications will be made to one or more exemption programs within one year. This will occur after each annual review until the end of the planning period.

Program 17. Streamline Approvals for Affordable Housing Projects: The City will develop a preliminary application form and procedure or will formally adopt the Preliminary Application Form developed by the California Department of Housing and Community Development (HCD), pursuant to SB 330. The City will also establish a written policy and/or procedure, and other guidance as appropriate, to specify the SB 35 streamlining approval process and standards for eligible projects under Government Code Section 65913.4. The applications will be available on the City's website for developers interested in pursuing the streamlined process or vesting rights.

Quantified Objectives: 300 new units permitted ~~N/A~~

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Develop or adopt HCD's SB 330 preliminary application form by December 2024. Develop an SB 35 streamlined approval process by June 2025 and implement as applications are received.

Program 18. Density Bonuses: The City will continue to allow density bonuses that exceed State requirements and periodically amend its Development Code to comply with changes in California's density bonus law (Government Code Section 65915 et seq., as revised) and will promote the use of density bonuses for lower-income units by providing information through a brochure in City buildings and on the City's website. In addition, as part of the Development Code process the City will explore the creation of a new staff level process that would allow projects for all income levels to exceed density maximums (General Plan prescribed and 100-percent bonuses).

Quantified Objectives: Facilitate the construction of 1,000 lower-income units to increase mobility opportunities; encourage density bonus units in high-resource areas.

Potential Funding: General Fund and grant funding

Who Is Responsible: Community Development Department

Time Frame: Complete as part of Comprehensive Development Code Update by ~~December 31, 2023~~ early 2024; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.

GOAL HE-4 AND ASSOCIATED POLICIES

GOAL HE-4: PRESERVE EXISTING HOUSING. CONSERVE AND ENHANCE EXISTING HOUSING IN STOCKTON'S NEIGHBORHOODS.

Policy HE-4.1 Preserve Existing Affordable Housing: The City shall seek to preserve existing affordable rental housing, such as subsidized apartments for lower-income households, mobile homes in mobile home parks, and low-cost private rental housing. (Program 19 and 22)

Policy HE-4.2 Housing Maintenance and Rehabilitation: The City shall encourage maintenance, repair, and rehabilitation of existing owner-occupied, rental, and affordable housing to prevent deterioration of housing and ensure that housing is safe and sanitary. (Program 20)

Policy HE-4.3 Housing Unit Replacement: The City shall promote the removal and replacement of dilapidated housing units in compliance with State law regarding replacement of existing affordable housing. (Program 21 and 22)

Policy HE-4.4 Property Management: The City shall encourage good property management practices in rental properties through regulatory agreements, informational items, code enforcement staffing, the Crime Free Multi-family Housing program, and the City's rental inspection ordinance. (Program 21)

GOAL HE-4 IMPLEMENTATION PROGRAMS

Program 19. Preserve At-Risk Units: Pursuant to Assembly Bill (AB) 1521, the City will monitor the list of all dwellings in Stockton that are subsidized by government funding or low-income housing developed through local regulations or incentives. The list will include, at a minimum, the number of units, the type of government program, and the date on which the units are at risk to convert to market-rate dwellings. There have been 392 units (see Analysis of At-Risk Housing section in [the](#) Regional Housing Needs Assessment) identified as at risk of converting to market rate within [ten \(10\)](#) years of the beginning of the 6th [Cycle](#) Housing Element planning period. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/ occupancy; and the date on which the units are at risk to convert to market rate. The City will work to reduce the potential conversion of any units to market rate, [in order](#) to reduce the potential for displacement and [/or](#) placement of additional constraints on the existing affordable housing stock through the following actions:

- [Monitor](#) the status of affordable projects, rental projects, and manufactured homes in Stockton. Should the property owner(s) indicate [at the](#) desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.
- [Provide information on at-risk housing as well as other housing options and programs for residents and housing advocates on the City's website.](#)
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher [\(Section 8\)](#) program. Funding sources may include state or local funding sources to reduce potential for displacement of residents.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within [three \(3\)](#) years, 12 months, and [six \(6\)](#) months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the [City](#). In addition, notice shall be required prior to

conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements, that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing [administration / management](#).

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market values is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing in the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the ~~45-~~ 55-year restriction shall be "rolled over" for another ~~45-~~ 55 years to protect "at-risk" units.

Quantified Objectives: Continue to monitor the 392 assisted units, and if any become at risk, work with property owners to develop a strategy to provide assistance to maintain or replace 392 at-risk units as affordable to reduce potential for displacement of tenants and loss of affordable housing stock in the city.

Potential Funding: HOME, CDBG, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Ongoing communication with owners, service providers, and eligible potential purchasers; work with owners of deed-restricted units on an ongoing basis, in particular at the time of change of ownership.

Program 20. Housing Rehabilitation Programs: The City shall continue to administer its owner-occupied loan program and emergency repair program using a variety of funding sources, including CDBG and HOME funds. The City will improve communication regarding rehabilitation assistance programs currently available for lower-income households, including to eligible owners of mobile homes, and rental property owners to alleviate substandard conditions. The City is currently conducting a study that included a windshield survey of the former redevelopment areas and opportunity zones to identify parcels/properties with physical signs of deterioration, vacant properties, and potential environmentally contaminated sites. The results of the study and survey will inform priorities for rehabilitation during the planning period. In addition, the HAP and Neighborhood Action Plans will outline underutilized and vacant parcels as well as complete a housing condition survey to indicate units in need or repair.

Quantified Objectives: Assist 300 lower-income units to address potential displacement, especially in areas of the city with the poorest housing conditions.

Potential Funding: HOME, CDBG, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Complete study and survey in 2023. Rehabilitation program is ongoing.

Program 21. Code Enforcement Program: The City shall continue to inspect housing units in targeted areas to check for building code violations. In situations where properties cannot be rehabilitated, the City will continue to enforce the removal and replacement of substandard units.

Quantified Objectives: Inspect 2,000 units annually

Potential Funding: CDBG

Who Is Responsible: Police Department: Neighborhood Services Division

Time Frame: Ongoing

Program 22. Replacement of Existing Affordable Units: In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development that removes existing residential units (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. ~~The HAP and Neighborhood Action Plans will outline underutilized and vacant parcels as well as complete a housing condition survey to indicate units in need of repair.~~ This requirement applies to:

- Nonvacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Ongoing

GOAL HE-5 AND ASSOCIATED POLICIES

GOAL HE-5: PROVIDE EQUITABLE HOUSING AND SUPPORTIVE SERVICES.

PROVIDE A RANGE OF HOUSING OPPORTUNITIES AND SERVICES FOR HOUSEHOLDS WITH SPECIAL NEEDS, PROMOTE HOUSING OPPORTUNITIES FOR ALL RESIDENTS, AND SUPPORT THE ELIMINATION OF DISCRIMINATION IN HOUSING.

Policy HE-5.1 Special Needs Accommodation: The City shall seek to accommodate housing and shelter for residents with special needs through appropriate zoning standards and permit processes. (Programs 23, 24, 25, 26, and 27)

Policy HE-5.2 Homeless Needs: The City shall strive to address the shelter needs of its homeless residents, and continue to support the provision of facilities and services to meet the needs of homeless individuals and families. (Program 23)

Policy HE-5.3 Temporary Housing: The City shall support temporary housing for individuals with special needs (e.g., seniors who have experienced abuse or neglect, individuals who may be at physical or psychological risk, mentally ill homeless individuals, those with HIV/AIDS or other debilitating illnesses) in board and care homes and respite centers. (Program 23)

Policy HE-5.4 Large Households: The City shall encourage the development of single-family and multifamily housing affordable to large households. (Program 28)

Policy HE-5.5 Households with Language Barriers: The City shall make information available on housing opportunities and programs to residents who are primarily non-English speaking. (Program 28)

Policy HE-5.6 Housing for Persons with Disabilities: The City shall encourage the development of housing accessible to people with disabilities, including developmental disabilities. -The City shall ensure equal access to housing by providing reasonable accommodation for individuals with disabilities. (Programs 24, 25, and 27)

~~Policy HE-5.7 Reasonable Accommodation: The City shall ensure equal access to housing by providing reasonable accommodation for individuals with disabilities. (Program 27)~~

Policy HE-5.78 Farmworkers: The City shall work with San Joaquin County in efforts to increase the availability of safe, sound, and affordable housing for farmworkers. (Program 26)

Policy HE-5.89 Prohibit Discrimination: The City shall support the strict observance and enforcement of anti-discrimination laws and practices including prohibiting discrimination in the sale or rental of housing with regard to race, color, national origin, ancestry, religion, disability, source of income, gender/gender identity, sexual orientation, marital status, and familial status. (Programs 28 and 30)

Policy HE-5.940 Affirmatively Further Fair Housing: The City shall affirmatively further fair housing consistent with State and Federal law through implementation of programs in this Housing Element and in all other City practices. (Program 28 and 29)

GOAL HE-5 IMPLEMENTATION PROGRAMS

Program 23. Continue to Support Organizations Assisting Homeless Persons: The City shall annually apply for and continue to pursue State and Federal funds available to the City, private donations, and volunteer assistance to support homeless shelters. The City shall continue to provide financial assistance from its Emergency Solutions Grant (ESG) funding to homeless service providers and continue to support additional development of shelter facilities as requested by shelter providers. In addition, the City shall review the need for additional shelter facilities and services when it updates its Consolidated Plan.

Quantified Objectives: Annually, assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. As part of this, increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds.

Potential Funding: ESG, CDBG

Who Is Responsible: Economic Development Department

Time Frame: Apply for funding annually

Program 24. Continue to Assist the Disabled in Community Development Block Grant Project Areas: The City shall continue to include special provisions for housing the disabled in CDBG project areas, including mobility grants for homes (e.g., Emergency Repair Program) and accessibility features.

Quantified Objectives: Provide mobility assistance home-repair grants for 120 low-income individuals and households in Stockton, including rental units for owners of [four \(4\)](#) or fewer rental units.

Potential Funding: CDBG

Who Is Responsible: Economic Development Department, Public Works Department

Time Frame: Annually, contingent upon CDBG funding

Program 25. Universal Design: Update the City's standards in the Development Code to encourage universal design features in new homes and accessory dwelling units and improve access to housing for senior residents and other residents with disabilities.

Quantified Objectives: 100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least [five \(5\)](#) of these units to be located near transit stations and services.

Potential Funding: General Fund

Who Is Responsible: Community Development Department

Time Frame: Make updates as part of the Comprehensive Development Code update by ~~December 31, 2023~~[early 2024](#)

Program 26. Assist Farm Workers and other Members of the Workforce: The City shall continue to provide ongoing assistance to farm laborers by working with the San Joaquin Housing Authority, San Joaquin County, agricultural employers, farm labor housing advocates, and the development community to develop affordable, decent housing, including rental housing, for farm workers. The City will update how employee housing (including housing for agricultural workers) is allowed in the Development Code in Program 12.

Quantified Objectives: Assist other organizations in developing at least 500 units of housing for farmworkers in Stockton or in the ~~C~~ounty during the planning period.

Potential Funding: CDBG, HOME, CalHOME

Who Is Responsible: Economic Development Department

Time Frame: Meet twice per year to explore opportunities for farmworker housing

Program 27. Addressing the Needs of Those with Disabilities: The City shall continue to work with the Valley Mountain Regional Center to implement an outreach program that informs families in the ~~C~~ity about housing and services available for persons with developmental disabilities. The program includes informational brochures, and information is available on the City's website. For compliance with State law, the City will revise or delete the following two findings for granting a reasonable accommodation:

- Whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures.
- Whether alternative reasonable accommodations could provide an equivalent level of benefit.

The City will also make the following revisions:

- Section 16.214.030 Definitions: "Individual with a disability" means any person who has a medical condition, physical disability, or mental disability that substantially limits one (1) or more of the person's major life activities, as those terms are defined in the Acts." The City's definition here aligns with the federal, but not the state definition of disability. To comply with Government Code § Gov. Code §12926.1(c), the City will strike the word "substantially". The City shall also include a complete definition of disability: The Act protects any of the following: an individual with a physical or mental impairment that limits one or more major life activities; anyone who is regarded as having any such impairment; or anyone who has a record of having such an impairment. Individuals in recovery from drug or alcohol abuse are protected by federal and state fair housing laws. However, individuals currently using illegal substances are not protected under the law, unless they have a separate disability.
- The Development Code shall be updated to be clear that protections afforded people with disabilities under federal and state fair housing laws extend to those who are associated with them, including providers and developers of housing for people with disabilities.
- Section 16.214.060 Application Filing: A provision will be made to ensure confidentiality of the person with a disability's contact and medical information. Further, this section will make clear that not only may a person with a disability file an application, but also an organization serving people with disabilities (e.g. sober living homes, transitional or supportive housing for people with disabilities, etc.)

- Section 16.214.070 Review and Processing: The City will remove the requirement to notify neighbors of a reasonable accommodation request, to ensure meaningful access to the City's land use and zoning programs under the ADA and to affirmatively further fair housing under AB 686 and the Fair Housing Act.
- Section 16.214.080 Findings and Decision: The City will add a clause making it clear that if the request is denied because it would impose an undue financial and administrative burden on the County and/or would require a fundamental alteration to the zoning or building laws, policies or procedures of the County, the Director or their designee must engage in an interactive process with the person seeking the accommodation to determine if there is another reasonable accommodation that may provide an equivalent level of benefit.
- Section 16.214.090 Appeals: Revise to state that appeals will be directed to the City Manager in consultation with the ADA Coordinator, in order to ensure confidentiality.

The City shall also prepare public information brochures and website information on reasonable accommodations for disabled persons and translate the materials to provide information to residents with language barriers. The City shall make this information available at the public counter and distribute the materials to community groups and organizations that represent persons with disabilities.

Quantified Objectives: N/A

Potential Funding: General Fund

Who Is Responsible: Economic Development Department

Time Frame: Revise the Reasonable Accommodation findings—procedure including the findings as part of the Comprehensive Development Code Update by December 31, 2023early 2024. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review.

Program 28. Practices to Affirmatively Further Fair Housing: In compliance with California Government Code Sections 8899.50, 65583(c)(5), 65583(c)(10), and 65583.2(a) (AB 686), develop a plan to "affirmatively further fair housing" (AFFH). The AFFH plan shall take actions to address significant disparities in housing access and needs for all persons regardless of race, color, religion, sex, gender/gender identity, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability and any other characteristic protected by the California Fair Employment and Housing Act (Part 2.8, commencing with Section 12900, of Division 3 of Title 2), Government Code Section 65008, and any other state and federal fair housing and planning law.

Specific actions include:

- Implement the following strategies to affirmatively further fair housing in coordination with the efforts of this action:
 - Strategies to facilitate housing mobility/expand affordable housing in high opportunity areas: Programs 6, 10, 12, 13, 15, 24, 25
 - Strategies to reduce or prevent displacement/place-based revitalization strategies: Programs 4, 7, 9, 14, 16, 19, 20, 21, 22, 29
- The City shall continue to provide funds from its CDBG Program to San Joaquin County Fair Housing to provide fair housing counseling and education and outreach efforts to Ccity residents. In addition to providing contact information for San Joaquin Fair Housing on the City's website (under the Housing Division), the City shall continue to make referrals to Fair Housing as issues/cases come to the City's attention. The City shall also work with Fair Housing to periodically review and update fair housing brochures that are provided to the public and posted on the City's website. The City shall distribute fair housing information at City offices, the library, community centers,

and other community facilities. These actions are ongoing. Review fair housing materials every two years starting in 2024. Update materials as needed every two years following the review. The City will assist at least 200 residents annually through the complaint referral process. If fewer than 200 residents use the process, provide assistance to all that do.

- The City will educate selected staff in the Community Development, [Economic Development](#), City Attorney, and City Manager departments on responding to complaints received regarding potential claims of housing discrimination and provide these selected personnel with a handout detailing the process for someone with a complaint and the agency that should be contacted regarding a claim: Legal Aid of Northern California. The City will also maintain a log ~~at the City Attorney's office~~ of all complaints received. ~~The initial T~~training of City staff will start in 2024; ~~with updated conduct updated~~ training ~~with new staff and to keep up with changes in the law every~~ occurring two (2) years thereafter ~~to align with changes to state law~~.
- The City will also work with San Joaquin Fair Housing to ~~provide~~ explore additional training to housing providers to prevent discriminatory actions and behaviors. ~~If the City does not have enough staff capacity to conduct The City will contract with a fair housing provider to provide~~ housing audits in order to reduce displacement risk, particularly in lower opportunity areas of Stockton, the City will explore contracting with a fair housing provider or outside housing consultant to provide assistance ~~ing b. By March 2025, and then later reviewed annually. The steps in the process would be~~ the City ~~will~~ issuing a Request for Proposals for partnership with an external consultant to provide ~~theis~~ service of conducting housing audits annually. ~~The City will initiate solicitation and contracting with an organization to assist the City with providing housing audits annually.~~ The City ~~would~~ will either renew the contract or seek a new fair housing provider to provide the same service on a yearly basis.
- The City shall review and update its Analysis of Impediments to Fair Housing Report every five years. The next update is scheduled to happen in 2025.
- Should the City conduct a new General Plan Update within the housing cycle, the elements will be updated to strengthen existing AFFH and equity programs as well as a new disadvantaged community inventory for city and unincorporated areas within the City's sphere of influence.
- The City shall post its Annual Housing Element Progress Reports to HCD on the City website annually in the Spring after the report is completed.
- The City will implement multilingual communication and outreach strategies for City-funded affordable housing developments as follows. To increase access to City housing programs and remove barriers to homeownership, provide translation services in the most common languages spoken locally at all public meetings by July 2024 and ensure all public materials are translated and made available.
- In order to assist with the high percentage of households living in overcrowded situations, the City will continue to encourage rental developments to add additional bedrooms and will consider prioritizing the use of HOME funds for rental projects, provided that some of the units have three or more bedrooms with a goal of approving 100 units with three or more bedrooms.
- Incentivize on-site child care in mixed use and multifamily development, particularly for projects in areas with higher proportions of single parent households.
- The City shall explore best practices for Rent Stabilization and Just Cause Evictions to increase the certainty and fairness within the residential rental market in the City in addition to the protection granted by California Civil Code Section 1946.2. Exploration may include efforts associated with the Housing Action Plan or additional outreach efforts specific to the topic presented.

Quantified Objectives: See individual strategies bulleted in the program language at left with specific targets.

Potential Funding: CDBG; HOME; General Fund

Who Is Responsible: Economic Development Department, Community Development Department

Time Frame: Refer to each strategy in this Affirmatively Furthering Fair Housing (AFFH) program for specific time frames.

Program 29. Environmental Health and Access to Resources: Environmental health is determined by air quality, climate change related outcomes, water quality, cancer prevalence, and more. Neighborhoods with poor environmental health conditions are often correlated to their proximity to industrial uses, major transit corridors, and other larger pollution sources. The City will facilitate environmental health-oriented, place-based revitalization of neighborhoods, particularly for housing in closer proximity to the lowest scoring areas in terms of environmental health, including the Port of Stockton along the San Joaquin River, Rough and Ready Island, downtown Stockton, and industrial areas east of the Union Pacific Railroad and south of Duck Creek to the southern boundary of the city adjacent to the Stockton Municipal Airport, which are more heavily impacted by pollution from prior industrial uses and diesel particulate matter from proximity to regional freeways and rail lines, through the following strategies:

- Update the City's Parks and Recreation Master Plan and continue to enhance existing parks, open space, and tree plantings and provide new parks and open space in these areas to improve environmental health. Facilitate safe pedestrian and bicycle access to parks or open spaces to reduce environmental health disparities across the city. Implement this objective during the CIP process.
- Work with Caltrans to reduce regional air quality impacts associated with regional transportation facilities. The City will meet with Caltrans annually, as feasible, to identify options for air quality improvements and coordinate action implementation.
- Partner with regional transit agencies and other organizations to address transit needs of those with disabilities including non-fixed-route transportation including paratransit, dial-a-ride, reduced-fare taxis or volunteer driver programs.
- Increase active transportation facilities in Downtown and South Stockton to reduce dependence on automobiles and enhance safe connections to existing pedestrian and bicycle routes. The City will identify at least two active transportation projects in these areas of the city by June 2025. The City has completed a sidewalk survey as part of the Neighborhood Action Plans (in Little Manila/Gleason Park, Cabral Station and South Airport Way areas) to identify gaps and where repairs are needed. As part of implementation of the Neighborhood Action Plans, the city plans to pursue funding to assist property owners with repair and installation of sidewalks in the three study areas. Funding could come from local sources such as the City's General Fund or State or federal sources such as the Safe Routes to School Program.
- Meet with school district representatives by June 2025 to analyze whether housing security poses a barrier. Work with the school districts to assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers to facilitate positive learning environments citywide.
- Implement new commercial/industrial zoning in South Stockton (details are provided in Program 15)
- Implement new industrial zoning standards and processing for reviewing existing and future industrial projects adjacent to residential uses (details are provided in Program 15)

Quantified Objectives: See individual strategies bulleted in the program language at left with specific targets.

Potential Funding: General Fund

Who Is Responsible: Community Development Department and Public Works Department

Time Frame: Refer to each strategy in this program for specific time frames.

Program 30. Removal of Racially Restrictive Covenants: Historically, covenants that restricted the sale of property to Whites or Caucasians-only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, if there are properties owned by the City of Stockton found to have racially restrictive covenants, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the

City's name. Additionally, State law (AB 1466) gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Since July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website, and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.

Quantified Objectives: Remove all racially restrictive covenants from Stockton City-owned properties by ~~June-December~~ 2025 and assist in the removal of all from-known privately owned properties by the end of the ~~planning-6th housing cycle~~ period. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds.

Potential Funding: General Fund; grants if offered through a State or County program

Who Is Responsible: Community Development Department; San Joaquin County Recorder

Time Frame: Remove all covenants on City-owned properties by ~~June-December~~ 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing.

IMPLEMENTATION PROGRAM TABLE

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
Goal HE-1: Increase Housing Production and Ensure Adequate Land for All Housing Types and Income Levels		
1. Adequate Sites Monitoring and No Net Loss	Continue to maintain sufficient sites to address 12,673 units	Update inventory annually as part of the Housing Element Annual Progress Report and assess “no net loss” as projects come forward on Housing Element sites
2. Downtown Implementation	4,400 residential units in the Greater Downtown Area by 2040	<u>Adopt Comprehensive Development Code Update and HAP by early 2024; and annually thereafter to identify any additional strategies to address General Plan goals.</u> Adopt Comprehensive Development Code Update by end of 2023; annually thereafter identify any additional strategies to address the settlement agreement General Plan goals.
3. Sites Included in Previous Housing Elements	<u>437 residential units on 16 repeat sites identified in Appendix A that don't already allow residential development by right.</u> 246 residential units on 9 repeat sites that don't already allow residential development by right	Update Development Code and, if needed, Land Use Element by December 31, 2026
4. Public Facilities Repair and Replacement	5 public facility/ infrastructure projects	Annually
5. Housing and Neighborhood Action Plans	<u>Permit</u> 1,000 residential units	Late 2023
6. Accessory Dwelling Units	Approve 180 ADUs over the course of the planning period, targeting areas of high opportunity, specifically the following neighborhoods - Brookside/Country Club, Weston Ranch, Eight Mile/Bear Creek, Midtown around the University of the Pacific (between I-5 and “Miracle Mile/Pacific Avenue), western Upper Hammer/Thornton Rd, and eastern Morada/Holman.	<u>Starting in November 2024, evaluate the consistency of Stockton's ADU regulations with State law and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and, identify additional site capacity, if needed, by December 2026. Apply annually, or as grants are available, for funding to support ADU incentives.</u> Starting in November 2024, evaluate the consistency of Stockton's ADU regulations with state law and update accordingly. Continue to make ADU materials available; evaluate effectiveness of ADU approvals every other year, starting April 2025; and identify additional site capacity, if needed, by December 2026. Apply annually for funding to support ADU incentives.
7. Infill Strategy	100 extremely low-income units and 150 other lower income units; funding for 10 brownfield sites minimum	Adopt Housing Action Plan by the end of 2023. Implement Housing Action Plan strategies by 2025. Annually, beginning in 2026, identify any additional strategies needed to address overpayment and reduce displacement risk and implement them within 2 years of identification.

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
8. Infill Site Assembly	Facilitate lot consolidation to produce sites for 2,300 moderate and above moderate residential units	Ongoing, as projects come forward; establish program to connect property owners and developers by June 2026.
Goal HE-2: Provide High Quality Housing for All Income Groups		
9. Coordination with the Housing Authority of San Joaquin County	Provide vouchers to 3,800 households in Stockton and assist these lower income households in accessing rental opportunities with Housing Choice Vouchers to facilitate housing mobility	Ongoing; establish education program by the end of 2024 and distribute information. Then distribute information at least annually through the end of the planning period.
10. State and Federal Funding	Fund 200 extremely low-, 400 very low-, 450 low-income units; Provide down payment assistance to 75 low-income households, particularly in high opportunity areas.	Review funding opportunities annually; down payment assistance program is ongoing
11. Priority Sewer and Water Service for Affordable Housing	<u>Include in Development Code as part of Comprehensive Update</u> N/A	Include in Development Code as part of Comprehensive Update by December 31, 2023 <u>early 2024</u>
12. Property Assessed Clean Energy (PACE) Program	Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.	Ongoing
13. Green-Up Stockton	Connect 60 eligible Stockton residents with energy- and cost-saving programs to reduce overpayment on housing costs.	Ongoing
14. Weatherization Activities	200 units weatherized	Ongoing
Goal HE-3: Remove Governmental Constraints		
15. Development Code Revisions	N/A	December 31, 2023 <u>Early 2024</u>
16. Fiscally Positive Impact Fees	Provide exemptions and reductions to 200 housing units to reduce overpayment for housing costs and reduce displacement risk.	Annually, evaluate exemptions provided and determine whether all constraints to housing development associated with impact fees or other funding mechanisms are sufficiently addressed. If it is found that they are not being addressed, modifications will be made to one or more exemption programs within one year. This will occur after each annual review until the end of the planning period.
17. Streamline Approvals for Affordable Housing Projects	<u>300 new units permitted</u> N/A	Develop or adopt HCD's SB 330 preliminary application form by December 2024. Develop an SB 35 streamlined approval process by June 2025 and implement as applications are received.

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
18. Density Bonuses	Facilitate the construction of 1,000 lower-income units to increase mobility opportunities; encourage density bonus units in high-resource areas.	<u>Complete as part of Comprehensive Development Code Update by early 2024; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.</u> Complete as part of Comprehensive Development Code Update by December 31, 2023; annually review Development Code and revise as needed; produce brochures and make information available on the City's website by December 2024.
Goal HE-4: Preserve Existing Housing		
19. Preserve At-Risk Units	Continue to monitor the 392 assisted units, and if any become at risk, work with property owners to develop a strategy to provide assistance to maintain or replace 392 at-risk units as affordable to reduce potential for displacement of tenants and loss of affordable housing stock in the city.	Ongoing communication with owners, service providers, and eligible potential purchasers; work with owners of deed-restricted units on an ongoing basis, in particular at the time of change of ownership.
20. Housing Rehabilitation Programs	Assist 300 lower-income units to address potential displacement, especially in areas of the city with the poorest housing conditions.	Complete study and survey in 2023. Rehabilitation program is ongoing.
21. Code Enforcement Program	Inspect 2,000 units annually	Ongoing
22. Replacement of Existing Affordable Units	N/A	Ongoing
Goal HE-5: Provide Equitable Housing and Supportive Services		
23. Continue to Support Organizations Assisting Homeless Persons	Annually, assist up to 2,000 unduplicated homeless persons; and 1,000 households at-risk of homelessness with limited-term rental assistance or utility payments. As part of this, increase the number of board and care or other types of residential or transitional care facilities for vulnerable populations by 300-500 beds. .	Apply for funding annually
24. Continue to Assist the Disabled in Community Development Block Grant Project Areas	<u>Provide mobility assistance home-repair grants for 120 low-income individuals and households in Stockton, including rental units for owners of four (4) or fewer rental units.</u> Provide mobility assistance home-repair grants for 120 low-income individuals and households in Stockton, including rental units for owners of 4 or fewer rental units.	Annually, contingent upon CDBG funding
25. Universal Design	<u>100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least five (5) of these units to be located near transit stations and</u>	<u>Make updates as part of the Comprehensive Development Code update by early 2024.</u> Make updates as part of the Comprehensive Development Code update by

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
	services 100 housing units with universal design features to facilitate accessibility for persons with disabilities and seniors; encouraging at least 5 of these units to be located near transit stations and services.	December 31, 2023
26. <u>Assist Farm Workers and other Members of the Workforce</u>	Assist other organizations in developing at least 100 units or housing for farmworkers in Stockton or in the County during the planning period.	Meet twice per year to explore opportunities for farmworker housing
27. <u>Addressing the Needs of Those with Disabilities</u>	N/A	Revise the Reasonable Accommodation procedure including the findings as part of the Comprehensive Development Code Update by early 2024. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review. Revise the Reasonable Accommodation findings as part of the Comprehensive Development Code Update by December 31, 2023. Prepare public information on Reasonable Accommodations by June 2024. Continue to partner with the Valley Mountain Regional Center and review the materials on the City website annually starting in 2024 and update as needed after each annual review.
28. <u>Practices to Affirmatively Further Fair Housing</u>	See individual strategies bulleted in the program language at left with specific targets.	Refer to each strategy in this Affirmatively Furthering Fair Housing (AFFH) program for specific time frames.
29. <u>Environmental Health and Access to Resources</u>	See individual strategies bulleted in the program language at left with specific targets.	Refer to each strategy in this program for specific time frames.
30. <u>Removal of Racially Restrictive Covenants</u>	Remove all racially restrictive covenants from Stockton City-owned properties by December 2025 and assist in the removal of all known privately owned properties by the end of the 6th housing cycle. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds. Remove all racially restrictive covenants from Stockton City-owned properties by June 2025 and from privately owned properties by the end of the planning period. Advertise County program starting in 2025; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2025, with ongoing reminders in City publications and at City events.	Remove all covenants on City-owned properties by December 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing. Remove all covenants on City-owned properties by June 2025; launch informational campaign between June and December 2025; encouragement of removal of covenants from private properties is ongoing.

IMPLEMENTATION	QUANTIFIED OBJECTIVES	TIME FRAME
	<p>Support County enforcement of this State requirement as appropriate through City actions. Work with at least 20 property owners annually to support their efforts to remove restrictions from their deeds.</p>	

QUANTIFIED OBJECTIVES

Table HE-1 below summarizes the City's quantified objectives for new construction, rehabilitation, preservation, and housing assistance over an eight-year time frame. These quantified objectives represent targets. They are estimates based on past experience, anticipated funding levels, and anticipated housing market conditions.

**Table HE-1: SUMMARY OF QUANTIFIED OBJECTIVES
2023-2031**

PROGRAM	EXTREMELY LOW	VERY LOW	LOW	MODERATE	ABOVE-MODERATE	TOTAL HOUSEHOLDS
New Construction ¹	1,232	1,233	1,548	2,572	6,088	12,673
Rehabilitation ²	700	900	900	-	-	2,500
Conservation/Preservation of At-Risk Units ³	600	957	985	825	825	4,192

Notes:

1. Corresponds to the City's RHNA.
2. Corresponds to objectives in Programs 14, 20, and 21.
3. Corresponds to the at-risk affordable assisted units in the city (see Housing Needs Assessment, Table HE-42 and Program 19) and objectives from Programs 9 aiming to conserve existing housing.

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Shape Stockton Housing and Neighborhood Feedback Summary-*updated June 2023*

The following comments summarize feedback received from all workshops, study sessions, neighborhood meetings, go-to-them-events, stakeholder interviews, and one-on-one meetings.

HOUSING

General Comments

- Existing buildings have problems with windows and egress.
- Need to maintain and improve the code to allow mixed-use and downtown residential more viable.
- Having to meet all residential and all commercial development codes is expensive.
- People who moved into live-work lofts were living but not working there.
- Residential is by-right in CD zone, which helps.
- If Stockton wants more housing, it needs to create business and make it easier to develop 3-story garden apartments with stairs and no elevator. can't do 4 stories with elevators or podiums and justified by the rents. Three stories usually hit around 24 units/acre.
- The city didn't want apartments previously but has changed its tune and now supports them.
- Notice more than just property owners directly impacted by the efforts.
- Consider inclusionary housing policies for the City.
- Concern about equity and housing justice; protect against gentrification.
- Consider inclusionary housing and a community land trust.
- 60-80 units per acre is the minimum number of units some need for a new affordable housing project. Mutual Housing is working on a project that is about 120 units per acre, but this project could be up to 200 units per acre.
- Infrastructure and environment can be a big issue in infill sites.
- What happens if the City does not hit its RHNA numbers?
- Explore the affordable gap in private project development.
- Explore or encourage the use of Master Development Plans.
- Does the City give bonds to help out with construction costs?
- How is the Housing Action Plan (HAP) useful if it is not legally binding?
- Include more CEQA streamlining recommendations and allowances.
- City doesn't do anything to help low-income communities on the edges/fringes.
- Are there sub-categories within lower income?
- Some sites identified have constraints, so they haven't been developed yet. For example, title issues, infrastructure issues, and environmental constraints.
- The City process of working with applicants and saying yes to projects has improved, but more work is needed. The City could be more proactive than reactive in helping projects progress.
- Need exemptions for offsite infrastructure improvements for affordable housing - cost kills projects.
- City must find funding for outdated offsite infrastructure (streetlights/sidewalks).
- EIFDs to attract developers.
- Nonprofit projects shouldn't be treated like for-profit development.
- Infill costs of deferred maintenance put off onto affordable projects makes them no longer affordable.
- The City should maintain impact fee waivers for affordable projects.
- Priority sites should follow the dollars/funding sources, be transparent with funding sources, and encourage flexibility with sites.
- Further streamlining of the permit process.
- Pre-designed plans or approvals would help, especially with infill/scattered site development.
- Need the ability for waivers on oddly shaped parcels.
- Funders avoid items that trigger prevailing wages.

Shape Stockton Housing and Neighborhood Feedback Summary-*updated June 2023*

- Interested in Adaptive Reuse of buildings downtown and any potential waivers/incentives in the Development Code that could help them attract developers.
- Parking reductions don't help them, as tenants are not located near quality transit want to park.
- Stockton lacks quality transit as compared to Sacramento, and maybe when we get there, less parking outside the downtown will help, but not now.
- The area needs a better bike/ped system.
- SESP has made projects pencil out. With rising interest rates, without SESP, they would stop building in Stockton due to financial constraints.
- RSSC is forming a Housing Justice coalition creating separate entity. Will the City be a part of that effort.

NEIGHBORHOOD PLANS

General Comments

- Do not concentrate on affordable housing in one place.
- People need help beyond housing, including education and jobs. Some people do not want government assistance or housing support.
- Improve homelessness and safety in all three Study Areas.
- Landlords are pushing people out of their homes. Address emergency housing situations in the plans. Police are also clearing encampments and belongings.
- Allow an environment that is conducive to promoting/improving properties; improve customer service at the Planning counter.
- People drive fast on Pock Lane, there is a need for speed bumps.
- There is a need for police patrol at the farmer's market.
- Re-stripe streets where needed. There are inoperable cars on the street that need to be removed.
- Improve and maintain parks throughout the City, especially the basketball courts. Most parks are safe during the day but feel unsafe at night.
- There is a need for remodeling and renovation of old dilapidated businesses. Perhaps more City money or grants could help with this.
- Addressing safety concerns should be the main focus.
- There is a need for duplex/triplex/fourplex units in these neighborhoods. Could be rentals or ownership units, but they need to be attainable. It would be nice to have a program to help people purchase these units.
- Provide resources and housing opportunities for the homeless.
- Reach out to the community and ask them what they would like to see in their neighborhood. The Dorothy Jones Community Center could be a venue option for an open house in South Airport Way. Talk with the churches in these areas to spread the word about the open house. Lueathel from the African American Chamber of Commerce San Joaquin is part of the Ministerial Alliance that meets at a church near South Airport Way. They can help spread the word about the open house. Work closely with Assembly Bill 617.
- Community ambassadors can help address safety concerns in these neighborhoods, especially in South Airport Way.
- The wages for jobs in Stockton must equal the cost of living. People that live here commute outside of Stockton for work. There are not a lot of high-paying jobs in San Joaquin County.
- People cannot afford to buy homes because they are getting priced out by bay area investors.
- There are multiple generations living in the same home in Stockton. The COVID-19 pandemic increased this issue.
- Take into consideration parking when planning new housing in these areas.

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- There is a need for affordable housing in Stockton, especially in North Stockton. Prioritize higher-density multifamily housing that is affordable and near transit.
- There are no benches at many bus stops.
- Support the placement of new housing in walkable areas near grocery stores. Help ensure single-family homes are being purchased by individuals and families instead of organizations.
- Are there plans to form a committee as part of the Neighborhood Action Plan effort?
- Reach out to the community to ask them about their housing needs. Hold pop-ups at an existing event or maybe at a park. Attend resource fairs. Use Stocktonia.org to advertise events. Go to churches and have a booth (St. George's is the main church). Utilize Council Members to spread the word.
- Barriers to housing include community opposition and drug abuse. There is also not enough space to build housing.
- People cannot afford homes because they are getting priced out.
- There are vacant industrial buildings that are underutilized.
- High development impact fees can be a barrier to housing development, one of our developers was charged a significant amount of school fees.
- Timing is important for developers; they lose money each month their project is delayed. Treat developers as customers.
- Support adaptive reuse of buildings like the Anaheim Packing building.
- There is a need for hotels, especially in downtown Stockton.
- Hatch workshop could benefit from some type of support.
- Build relationships with hotels and support the conversion of hotels to homes.
- Recommends the City create a homeownership training course that is available for the public. Do workshops in the encampments to boost the morale of the people living there.
- Support mixed-use housing development in these neighborhoods. There is a need for housing with wrap-around services, including a pharmacy, health services, and food. Also recommends live/work units.
- There is land that is underutilized and could be used for housing, but the owners do not want to do anything with the land.
- Housing needs to be accessible for the elderly and people with disabilities.
- There are people that commute to Amazon but do not live in Stockton. Consider how we can provide housing and activities for young people to entice them to live in the City. Young people need a place to live with parking. Provide nice walking trails or tracks where people can walk and play games.
- Some neighborhoods have a liquor store instead of a grocery store.
- Encourage the San Joaquin Regional Transit District bus to run more often.
- Infrastructure can be a barrier to housing development in all three neighborhoods, especially sewer and water upgrades. Funding for infrastructure upgrades can also be an issue. Some grants kick in prevailing wages which increases the cost to build new housing.
- Building affordable housing tends to pencil out more than market-rate housing in Stockton because of the funding opportunities.
- Look into the GreenMeansGo program from the Sacramento Area Council of Governments as a potential funding source.
- Environmental cleanup can also be a constraint.
- It could be costly to upgrade the telecom boxes, but this does not come up often when developing housing.
- It would help if the owner could give the land to an affordable housing developer and/or not charge the holding cost.

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- Enterprise is working on a displacement assessment for the City. Maybe some of the actions can tie into the action plans.
- There is a need for quality education, jobs, and housing in all study areas.
- Safety and drug use is a concern.
- Hold a training session for the board members and youth before starting the project's engagement efforts. Maybe hold a charette style workshop. Provide a one to two-month notice before scheduling an outreach event or training.
- Look into the Reconnecting Communities Pilot program. The National Parks Service has a History of Equal Rights grant opportunity.
- Consider the Hatch Workshop as a venue for outreach.
- The City does not have the funding needed for new affordable housing development. There is typically a need for local money to build affordable housing. Fee waivers or free land helps affordable housing developers. Also, the monthly rates housing developers can charge in San Joaquin County is much lower compared to other Counties. There is a need for project-based vouchers to get rental assistance for affordable projects.
- The more concessions and incentives the City can provide for affordable housing projects the better. Parking can be an issue, requiring less parking in areas that are near public transit.
- The City has opportunities to tap into State funds that could help pencil out affordable housing projects. Permanent Local Housing Allocation (PLHA) grants are one example.
- Lessening the permit review time can help since affordable housing developers cannot apply for grants until the entitlement process is finished. It can be burdensome for affordable housing development. Also, having one point of contact throughout the development review process is helpful instead of having multiple contacts.
- Basic amenities nearby are needed for new affordable housing development, including schools, transit, and grocery stores. New affordable housing near high quality transit opens up additional funding sources from the State, such as the Affordable Housing and Sustainable Communities grant.
- To qualify for a large family affordable housing project, a developer needs a minimum of 25 percent two-bedroom and 25 percent three-bedroom units.
- For a senior or supportive housing project, a developer might need a one-acre site. 2.5 to 3 acres could be needed for a family affordable housing project.
- Job training, workforce development and education would help the unhoused population. Encourage small business opportunities.
- The roads are unsafe for pedestrians and bicyclists, people drive fast on the roads in these neighborhoods. Make sure the bikeways are connected.
- Reinvent South Stockton Coalition is working with the Community Foundation to create a Stockton housing innovation fund that would be Citywide. It would be a private housing trust fund.
- Low-income apartments are needed in these neighborhoods. Visionary Homebuilders is a good partner, they build great properties. Maintenance of apartments is also important.
- The three study areas were hard to reach and hard to count for the census. An aging group of seniors and youth may not have services or amenities in these areas. Everyone is trying to figure out how to address issues in these neighborhoods.
- The lack of broadband and internet access is also an issue. There is no broadband in Little Manila/Gleason Park. Communication is very important; look into how to increase access in these neighborhoods.
- Transportation is an issue in these areas. The elderly need support to get to and from the doctor's office.
- Educational attainment is a concern in these neighborhoods.
- Health disparities exist in these neighborhoods. A lot of people do not want to live on the freeway because of air pollution.

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- The parks are not safe in these neighborhoods.
- There is a lot of veterans in these neighborhoods and registered sex offenders. There is a need for mental health services.
- To reach these communities, recommend sending out people that can be trusted by each community group should knock on doors. The San Joaquin County Hispanic Chamber of Commerce had success during the Census gathering because of this effort. They also handed out information through paychecks. The utility bill is also a good place to insert information.
- We need homes with four to five bedrooms because multiple families could live in the same home.
- Better wi-fi is needed in new apartments. Work with the creator of Pac West to increase internet access in these neighborhoods.
- All three areas are uniquely different, but they have the same need for affordable and market-rate housing that can bring some new life to it. There is a need for missing middle housing.
- If there are environmental issues at any site, reach out to the State to see what can be done in terms of funding to clean up the site.
- San Joaquin Partnership is working with the County Office of Education, University of Pacific, Worknet and Delta College on a program for the next generation of workers. Look at the Volt Institute in Modesto. Focus on text generation programs that include mechanics, artificial intelligence, and robotics.
- Set up a working group or some type of meeting with housing developers.
- Support for infill development with wrap-around services.
- There is a need for housing for families, such as duplexes, triplexes, apartments with two or more bedrooms.
- Cost of materials and labor is a barrier to housing development. The cost has gone down recently, but it is still expensive.
- There are absentee owners that change the dynamic of the neighborhood.
- Transportation can be an issue since some households in the area might only have one car per family.
- Educate landowners and homeowners about accessory dwelling units and junior dwelling units.
- Engage the landowners in the neighborhoods to ask them why they are not developing the sites.
- Resident input is very important. Talk with Reinvent Stockton Coalition, Little Manila Rising, Seventh Day Adventist Church, San Joaquin Council of Governments, public health services. Attending the farmers market event STAND holds. STAND also has two trust builders that go door to door. Identify the community member that is willing to be a leader to spread the word. STAND also sends out an eblast we can include information on. Work with the Housing Authority. Keep the messaging simple. Visuals work well. Talk with Saint Linus Church. Loop in the police department.
- The Notice of Funding Availability (NOFA) applications can be challenging. They are on a point system, and you need to show where the amenities are in proximity to the proposed housing development.
- Look for vacant land where no one is living.

Cabral/East Cabral Comments

- There has been at least one walking study completed from the Cabral station to the Amtrak station. The study found it was difficult to cross the streets in some areas and there are also handicap issues. There is also an issue with lighting during the wintertime since it gets dark earlier. Some of the lights under the freeway are broken. The homeless might be breaking the lights so people are not able to see where they are sleeping.
- There are key neighborhood commercial nodes in the Cabral/East Cabral/East Cabral Station Area, including along Wilson Way, Weber, and California. Think about how the action plans will promote sustainable corridors. This area needs more green space. Is the City working on a Downtown Station plan? Think about connectivity to

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the Cabral Train Station. Maybe the City can provide pedestrian friendly wayfinding from the train station. SJCOG is working with the rail commission to install bicycle parking at the rail station. There are not a lot of activities in downtown. Maybe live/work and mixed-use housing could work here. Look at circulation and mobility. How can we improve circulation in this neighborhood?

- Nonresponsive owners in the Cabral/East Cabral Station Area are an issue. There is a need for services and amenities in this area. Be mindful of building housing next to freeways.
- There is a need for streetlights that work and improved sidewalks. The walk from Amtrak to the Cabral Train station does not feel safe.
- There must be a mix of market-rate and affordable housing in the Cabral/East Cabral Station Area. Build housing that provides a certain percentage of market-rate and affordable units. Find ways to incentivize market-rate housing. Maybe the City can waive certain fees. The City of Modesto has a forgiveness program the City can look into which waives certain planning and building fees for new development downtown.
- There is a need for rental housing. However, in the Cabral/East Cabral Station Area, lower the number of rental units so there are also homeownership opportunities for those living in this neighborhood.
- Cabral/East Cabral Station Area has been a big interest for a mixed-use development with complimentary amenities for some time.
- Make building multifamily, affordable housing near the train station easier. There are examples out there that we can look at to see how can build market-rate housing near rail. Make sure vacancy rates are low. Corridors need to be cleaned up. Larger sites are owned by a handful of entities, so getting them together can be challenging.
- Pedestrian scale lighting standards should be added for safety as well as a wayfinding program.
- For smaller lots, the City should explore infill allowances for zero and/or small setbacks.
- The City should explore a transit-oriented development overlay to encourage more development by allowing no height restrictions, greater densities, flexible parking standards, and prohibiting specific auto-oriented uses (drive-throughs, fueling stations, carwashes, storage, etc.).

Little Manila/Gleason Park Comments

- There is an opportunity for placemaking and orienting people to the history of the Little Manila/Gleason Park study area. Maybe some improvements can be made to signify that this area is a gateway into the City. Market this area as a place that is worthy of people visiting. Access to the train station is challenging. We need a clear access point from the train station. Orient buildings and development towards the Mormon Slough. Maybe we can add a greenway along the Mormon Slough.
- During the walking tour of Little Manila/Gleason Park, the consultant team noticed: broken, uneven sidewalks; lack of trees and shade; no crosswalk on South San Joaquin Street and East Sonora Street; cars drive fast; and there are no trash bins. A schoolteacher cleans the street where she lives because there is daily trash in the street (a nearby restaurant that opens VERY early – the primary clientele is day laborers.)
- Live/work units could work well in Little Manila/Gleason Park and in the Cabral/East Cabral Station Area. Provide a space where artists can work and live.
- Gleason Park is the last major development that has occurred in the Little Manila/Gleason Park neighborhood.
- Ideas for reimagining Mormon slough includes bike lanes and a community garden.
- There will be a new navigation center near Little Manila/Gleason Park that will provide case management.
- There is a need for champions in Little Manila/Gleason Park that will encourage neighbors to maintain their properties.
- There are corner store markets in Little Manila/Gleason Park, but they do not offer healthy food options.

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- The lot sizes in Little Manila/Gleason Park constrain housing development. Housing preservation could work in this area. GRID has a single-family retrofit program the project team could look into.
- In the Little Manila/Gleason Park neighborhood, multiple families live in one home. There are also very few grocery stores in this neighborhood. Several agencies serve the unhoused community living in this neighborhood, people are fearful of the homeless. Talk to the police department.
- Improvement ideas proposed for the Mormon Slough include a bike trail, community center or a place for the youth, park, walking trail, and affordable housing near the slough.
- A potential new housing site in Little Manila/Gleason Park could include the parking lot on Sutter Street next to the community garden. It is an underutilized parking lot. Can also consider the parking lot and house at 520 South Hunter Street. Little Manila Rising is planning to build housing on the top floors of their two buildings.
- Lack of curb cuts and inaccessible sidewalks is an issue in Little Manila/Gleason Park. The tree wells are also not large enough for tree planting. There are concerns about asthma in this neighborhood. Buildings in Little Manila might not be up to code.
- Little Manila Rising may become a Community Development Corporation in a few years. How often does the Mormon Slough get water? Think about why the unhoused population congregates there. Maybe the City can build tiny homes. Bakersfield received an award for its plan on river access. Promote nontraditional models of housing for the homeless.
- The Little Manila/Gleason Park area could be developed further. Mormon Slough should be a priority, addressing the challenges occurring here. To address the small lot size issues in this study area, talk to the property owners to get buy in to adjust the lot sizes. Give people options.
- Maybe live/work units could work near the Mormon slough.
- The Central Valley is trying to target tech and 30 year old's that are not ready to buy a home yet.
- The San Joaquin Partnership have been receiving calls related to data centers.
- The area needs pedestrian-scale lighting standards and increased coverage standards.
- Traffic calming measures should be included (Bulb-outs, safe pedestrian crossings, etc.).
- For smaller lots, the City should explore infill allowances for zero and/or small setbacks.
- Larger tree wells to accommodate trees provide benefits beyond ornamental/aesthetic function.

South AirPort Area Comments

- There are commercial needs along the South Airport Way corridor.
- A lot of families in the South Airport Way neighborhood do not have transportation. Create a lively vibrant place where people can walk.
- Acknowledge the County fairgrounds When talking with people about the South Airport Way study area.
- One of the strategies is a community land trust.
- The 8th Street and South Airport Way project is a catalyst project for this neighborhood; moving this project along as much as possible is very important.
- In the South Airport Way study area, the City could help housing developers by showing the environmental issues in this area.
- Faith-based housing development could also be investigated.
- Consider extending the area boundary further south to examine how the industrial plays into the residential areas. There may be climate-related funding opportunities in this area. South Airport Way also needs rapid bus transit.
- Access to fresh foods is a need for the South Airport Way neighborhood. There is also a need for thriving businesses, parks, outdoor open spaces, and grocery stores in this neighborhood. There is a safety concern in this area.

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- Put beds or tiny homes on the old racetrack for the homeless.
- Think about what can be developed in the South Airport Way study area. There is a need for commercials as there is a food desert. Need to have access to grocery stores and other amenities.
- Reinvent South Stockton Coalition is looking at a low-income homeowner rehab program that could be for Fairview Terrace or Citywide.
- There is a plan for bikeways along South Airport Way. There is an opportunity for transit-oriented development near the bus transit stop. Provide transportation opportunities to the job center area to the south. There are challenges for people to get to the job center after hours. Consider where there are opportunities to put housing and other amenities along the South Airport Way corridor.
- South Airport Way is a very busy street. The streets are not conducive or safe for walking. The levee could be a nice place where people can walk, but there are homeless people in this area and some people feel unsafe. From Carpenter Street to Fair Street there are at least six schools. Promote safe routes to schools along this route. Build a walking path from the Sierra Vista affordable housing development to the Dorothy Jones Community Center. Have a participatory list where people can rotate and walk kids to school.
- Lots along South Airport Way might have environmental contamination issues which is a barrier to development since it is expensive to clean up the site. For example, the site located at the southeast corner of Ophir Street and 8th Street has environmental issues. The lot adjacent to Rancho San Miguel is also contaminated.
- South Airport way needs more multifamily housing and commercial development to support housing.
- South Airport Way has the highest rates of asthma, lowest education rates. There is also a concern about crime and safety. Trees are needed in this neighborhood. South Airport way is a food desert. The corridor also needs more streetlights.
- The South Airport Area study area is pretty built in from a residential perspective. Look down Mariposa Road.
- Look at the internet cable and where the water connection is located. Cable was very expensive to bring out there.
- Expand the boundary to Charter Way and encourage a grocery store or shopping center. There are also other dilapidated areas in the City to consider. The area around Ponce is worse than Sierra Vista.
- The City should explore minimum heights and/or stories to require larger nonresidential uses along Airport.
- Encourage the creation and use of more private and public owed spaces.
- Increase the amount of street trees/landscaping along Airport and side streets.
- Enhanced paving materials along Airport and side streets.
- Specific options for benches/trash receptacles/lighting/etc.
- Pedestrian-scale lighting standards.

SAFETY ELEMENT UPDATES

- Climate change is an issue and adaption, and resiliency must be addressed in City standards.
- Service and evacuation routes should be updated to reflect environmental and climate change impacts.