

# RESIDENTIAL DISPLACEMENT ASSESSMENT

CITY OF STOCKTON



# AUTHORS



## Enterprise Community Partners

Enterprise is a national nonprofit that develops programs, advocates for policies, and delivers the capital to preserve and develop affordable housing for low-income families. For over 35 years, Enterprise has created nearly 600,000 homes, invested more than \$43 billion, and touched millions of lives. Our Northern California office, which includes staff based in Stockton, seeks solutions to a range of the most relevant and pressing affordable housing issues facing Californians. As an intermediary, Enterprise provides technical assistance, convenes practitioners and advocacy coalitions, and collaborates with cross-sector partners including but not limited to public agencies, community-based organizations, affordable housing developers, researchers and academics, and funders

# ACKNOWLEDGEMENTS

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Cover image: Downtown Stockton (Photo credit: @DowntownStockton)

# INTRODUCTION

This report seeks to better understand the displacement vulnerability of Stockton households. This understanding can allow policymakers better insight as to what neighborhoods face the greatest displacement risk and, based on stakeholder feedback, select initial policies that can help to mitigate this risk. The report utilizes two mapping tools, quantitative and qualitative data to identify the types of displacement risk facing residents. In addition, this report recommends three primary policy and programmatic strategies that the City of Stockton can consider implementing to begin ensuring that its own policies help to support neighborhood housing stability and prevent the displacement of residents. These strategies were primarily selected in response to stakeholder feedback, which is summarized within a section below, and analysis of quantitative data.

Understanding and mitigating displacement risk is important for public agencies and organizations that work on behalf of the public interest, such as the City of Stockton. This understanding can help support community buy-in for future projects through the buildup of public trust and works to empower residents to more fully participate in an organization's planning processes. It can also help guide future investment, ensuring agencies like the City of Stockton are protecting existing residents as new investments in public infrastructure are made. In addition, state legislation increasingly requires local agencies to track and better understand demographic change tied to plans and projects and to mitigate displacement impacts that may be connected to these investments. Major funding initiatives such as the Transformative Climate Communities and Affordable Housing and Sustainable Communities programs, both of which have awarded funds in the City of Stockton, include requirements for displacement avoidance safeguards as part of eligibility and scoring criteria. If the City intends to continue applying for and benefitting from these and other funding programs, it will need to consider the risks tied to such investments and demonstrate not only awareness but also action being taken to mitigate and address such risks.



Photo credit: risestockton.org

# DEFINING DISPLACEMENT

Displacement, as defined by the Urban Displacement Project<sup>1</sup>, occurs when any household moves due to circumstances that:

- Are beyond the households’ reasonable ability to control or prevent (e.g. rent increases)
- Occur despite the household having met all previously imposed conditions of occupancy; and
- Make continued occupancy by that household impossible, hazardous or unaffordable

UDP also distinguishes between forced displacement – caused by eviction, foreclosure, converting a rental unit to a condominium, a natural disaster, etc. – and displacement that occurs as a response to

neighborhood conditions – increased costs of living, loss of a sense of community or a lack of affordable housing options. UDP also recognizes a third type of displacement – exclusionary. This is a more indirect form and essentially means that a household has far fewer options now than it may have recently because middle-class neighborhoods are becoming more exclusive and out of reach[. Exclusionary displacement includes factors like landlords not renting to households with vouchers, exclusionary zoning policies and neighborhood pushback toward affordable housing. Figure 1 further categorizes types and causes of household displacement.

**Figure 1:** Types and Causes of Displacement as categorized by the Urban Displacement Project

Types/Causes of Displacement		
	Forced	Responsive
Direct or physical causes	<ul style="list-style-type: none"> <li>• Formal eviction</li> <li>• Informal eviction (e.g., landlord harassment)</li> <li>• Landlord foreclosure</li> <li>• Eminent domain</li> <li>• Natural disaster</li> <li>• Building condemnation</li> </ul>	<ul style="list-style-type: none"> <li>• Deterioration in housing quality</li> <li>• neighborhood violence or disinvestment</li> <li>• removing parking, utilities, etc.</li> </ul>
Indirect or economic causes	<ul style="list-style-type: none"> <li>• Foreclosure</li> <li>• Condo conversion</li> </ul>	<ul style="list-style-type: none"> <li>• Rent increases</li> <li>• Increased taxes</li> <li>• Loss of social networks or cultural significance of</li> </ul>
Exclusionary	<ul style="list-style-type: none"> <li>• Section 8 discrimination</li> <li>• Zoning policies (restriction on density, unit size, etc.)</li> <li>• NIMBY resistance to development</li> </ul>	<ul style="list-style-type: none"> <li>• Unaffordable housing</li> <li>• Cultural dissonance</li> <li>• Lack of network</li> </ul>

<sup>1</sup>The Urban Displacement Project (UDP) is a research and action initiative of the University of California Berkeley and the University of Toronto. UDP conducts community-centered, data-driven, applied research toward more equitable and inclusive futures for cities. UDP’s methodology is used by the California Department of Housing and Community Development to assess displacement risk.

# DISPLACEMENT IMPACTS



*Photo credit: Enterprise Community Partners*

Displacement is not a singular, one-time unfortunate event. It has long-lasting impacts for families and their opportunities, with low-income people and people of color often being the hardest hit. Displacement also has real, direct impacts on community and resident health. Evictions in particular have been linked to an increased likelihood of subsequent homelessness and housing insecurity (e.g. overcrowding and increased difficulty in being able to secure new rental housing with an eviction on one’s record), as well as negative impacts on mental health and increased emergency room visits. UDP conducted research in San Mateo and Santa Clara counties, finding that a significant share of renter households that had been displaced were forced to move outside of their home counties,

often to neighborhoods with fewer job opportunities, longer commutes and safety concerns. The study also found that two out of three children in displaced households had to change schools which can negatively impact educational outcomes. New investment and associated gentrification is sometimes framed as an opportunity to diversify and bring economic vitality to previously disinvested neighborhoods, but the potential benefits do not always land equitably. Existing residents are not able to reap the benefits of new investment and economic opportunity in a neighborhood if they are displaced. This can result in “re-segregation” – displacing existing populations somewhere else in an effort to create more diverse and integrated communities.

# ASSESSING DISPLACEMENT RISK IN STOCKTON

While there is no universally accepted methodology for determining displacement risk, a number of indicators and approaches have emerged as concerns around neighborhood stability and residential displacement grow.

## San Joaquin County Gentrification and Displacement Mapping Tool

In 2022, Enterprise and the University of California, Davis' Center for Regional Change (CRC) collaborated on the development of a displacement mapping tool for San Joaquin County.<sup>2</sup>

This tool utilizes a methodology developed by the Urban Displacement Project. Using the UDP model as a foundation, Enterprise and CRC made select modifications based on best practices and stakeholder feedback. This included modifying the original definition of the "region" from a 13-county geography to San Joaquin County alone and collapsing UDP's nine differing typologies into four, as seen below in Figure 2.

**Figure 2: Typology Descriptions - San Joaquin County Gentrification and Displacement Assessment**

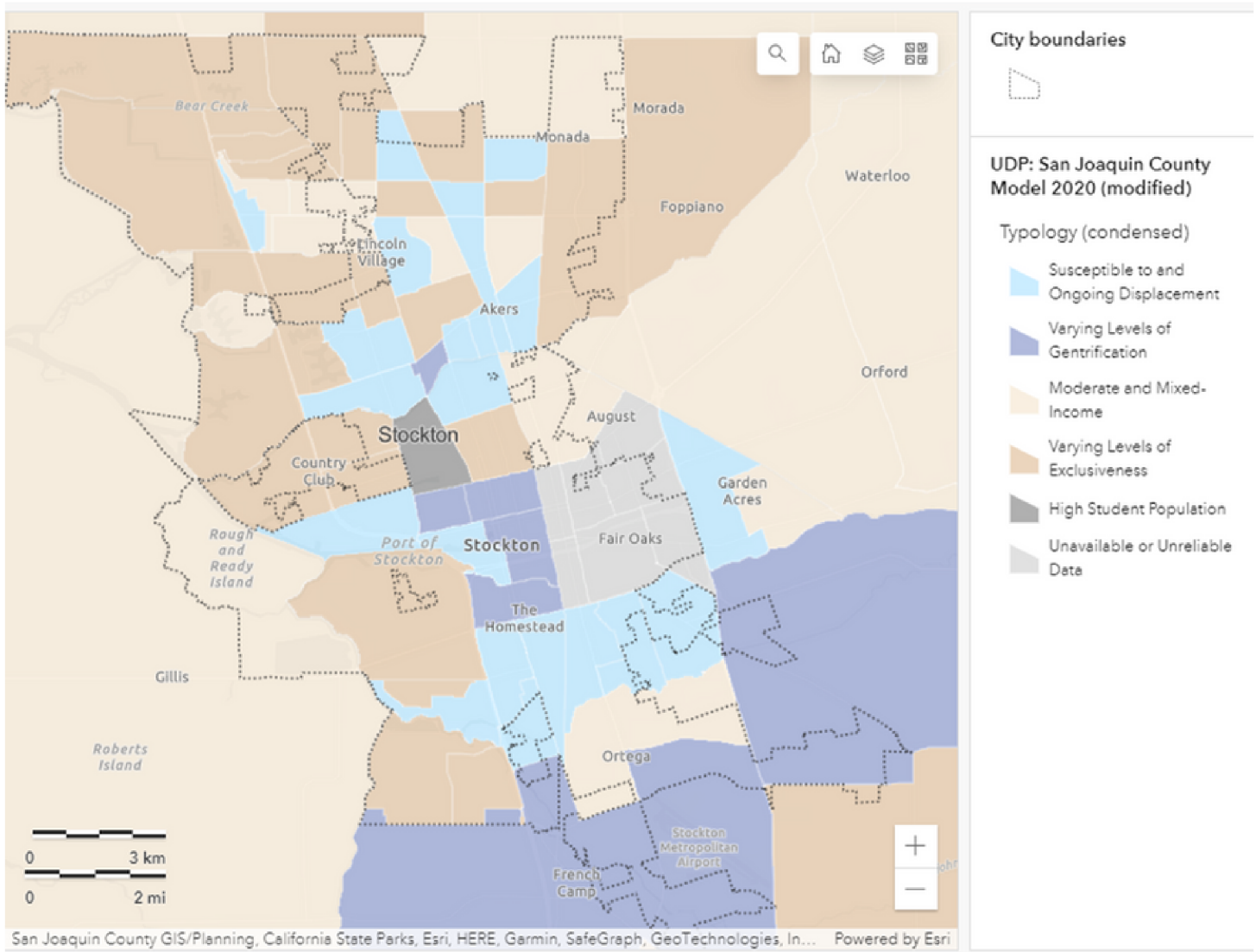
CONDENSED TYPOLOGY	DESCRIPTION*	ORIGINAL UDP TYPOLOGY
<b>Susceptible to and Ongoing Displacement</b>	These tracts are low or mixed low-income and some had an absolute loss of low-income households during the period of 2000-2018	Low Income/Susceptible to Displacement; Ongoing Displacement of Low-Income Households
<b>Varying Levels of Displacement</b>	These tracts have varying levels of income and housing affordability, and some tracts gentrified during 1990-2000 or 2000-2018, but all tracts have experienced an increase in housing costs and/or rental value during the 2012-2018 period.	At Risk of Gentrification; Early Ongoing Gentrification; Advanced Gentrification
<b>Moderate- and Mixed- Income</b>	These tracts range from moderate to high income and other variables are relatively stable.	Stable Moderate/Mixed Income
<b>Varying Levels of Exclusiveness</b>	These tracts range from moderate to high income and housing costs are increasing. In some tracts, low-income households are being excluded from entering and decreasing in numbers.	At Risk of Becoming Exclusive; Becoming Exclusive; Stable/Advanced Exclusive
<b>High Student Population</b>	These tracts have a high percentage of college students (over 30%) and therefore were excluded from the analysis.	High Student Population
<b>Unavailable or Unreliable</b>	These data were unavailable or unreliable.	Unavailable or Unreliable Data
<p>*Income levels relate to regional area median income (AMI). For the San Joaquin County model, AMI is equivalent to the MHI for San Joaquin County, \$55,167 (data source, 5-year 2014-2018 ACS data).</p> <p>Low Income = AMI &lt;80%      Moderate Income = AMI 80-120%      Moderate Income = AMI 80-120%</p>		

<sup>2</sup> The San Joaquin County Gentrification and Displacement Mapping Tool is publicly available on SJOAG's website.

## ASSESSING DISPLACEMENT RISK IN STOCKTON: SAN JOAQUIN COUNTY GENTRIFICATION AND DISPLACEMENT MAPPING TOOL

The typologies range from tracts that are “Susceptible to and experiencing ongoing displacement,” those designated as experiencing “Varying Levels of Gentrification,” to tracts that are labeled “Exclusive,” indicating that lower-income households may have difficulty accessing housing within such designated tracts because housing prices are out of reach for such households. “Moderate and Mixed-Income”-designated tracts indicate a stable mix of household incomes and demographics.

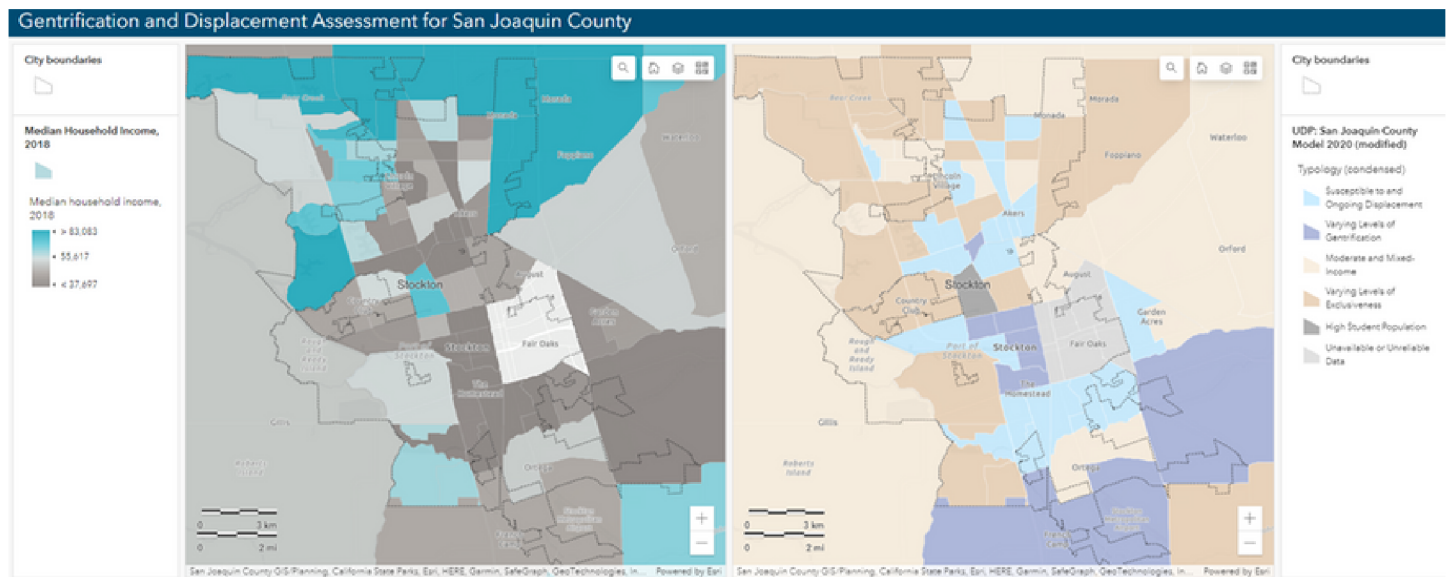
Figure 3 indicates that much of the southern portion of the City of Stockton and some tracts within the core are actively undergoing displacement and gentrification pressures. These tracts have seen a loss of lower-income households and experienced increases in both housing costs and rental value during the years between 2000 and 2018.



**Figure 3:** Gentrification and Displacement Assessment 2020 Typologies – San Joaquin County

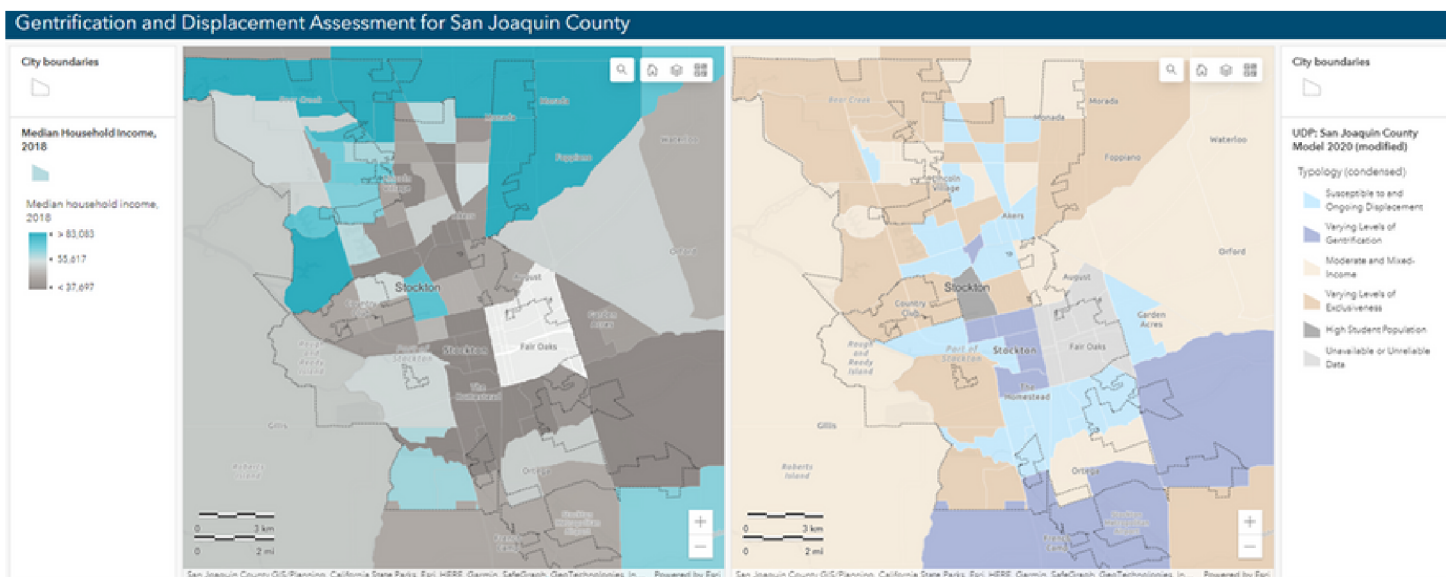


# ASSESSING DISPLACEMENT RISK IN STOCKTON: SAN JOAQUIN COUNTY GENTRIFICATION AND DISPLACEMENT MAPPING TOOL



**Figure 4:** Gentrification and Displacement Assessment for San Joaquin County – comparison of 2018 Median Household Income and tract typologies

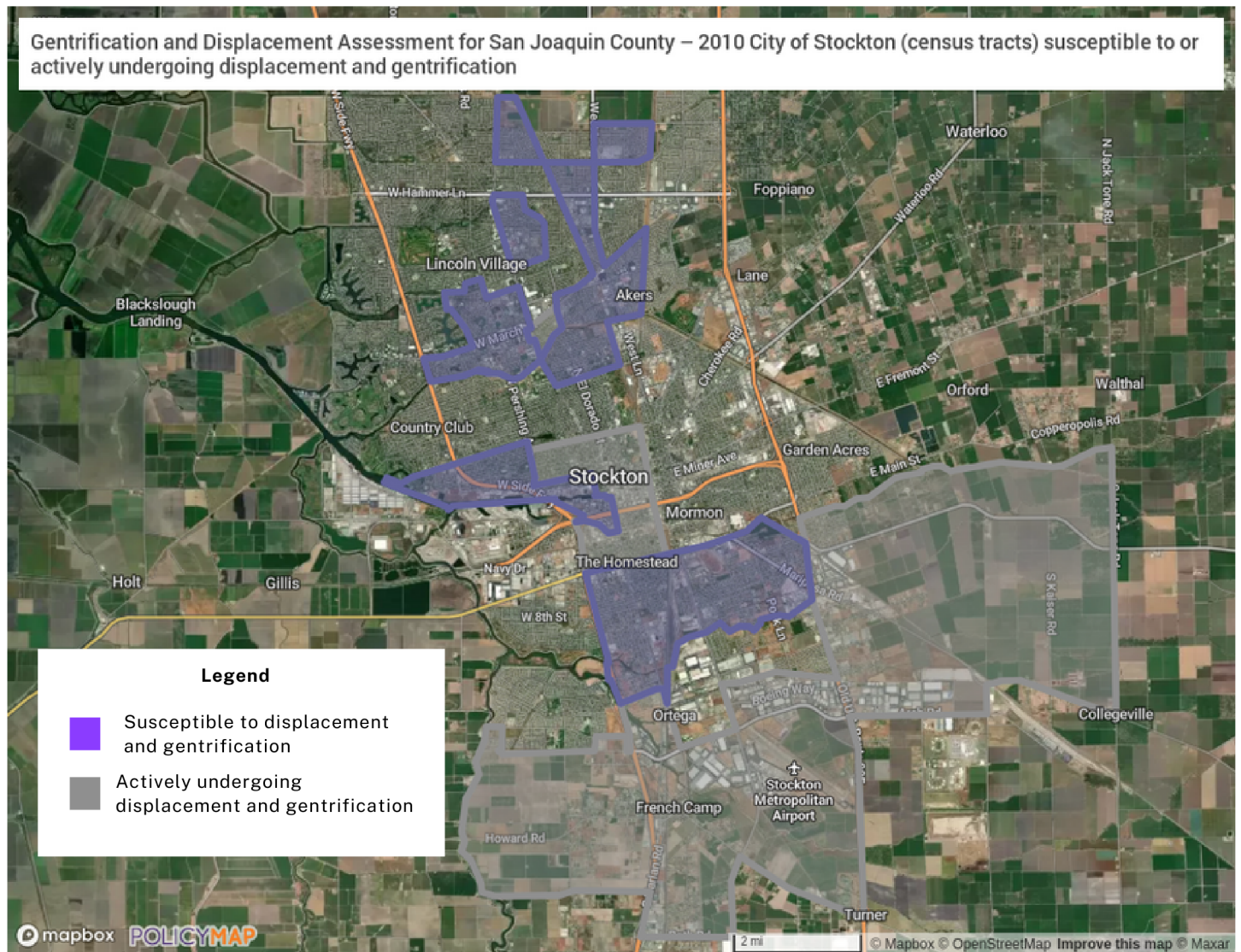
The San Joaquin County Gentrification and Displacement Assessment tool also allows for the comparison of additional indicators, as seen in Figure 4, where 2018 Median Household Income for San Joaquin County (\$63,567 annually) can be compared to the displacement risk typologies. The comparison indicates that those tracts designated as actively undergoing either displacement or gentrification appear correlated to tracts that, in 2018, reported household incomes below the county median. Similarly, tracts designated as experiencing either displacement or gentrification appear correlated to tracts that experienced overall population loss from 2000 – 2018, as indicated in Figure 5. Notably, significant population growth took place during this time period north of Stockton while the population declined in the core portions of the City.



**Figure 5:** Gentrification and Displacement Assessment for San Joaquin County – comparison of Percent Change in Population from 2000 – 2018 against tract typologies

<sup>3</sup>The San Joaquin County Gentrification and Displacement Mapping tool relies on Census and ACS data ranging from 2000 to 2018. 2017-2021 (ACS) Median Household Income data for San Joaquin County now stands at \$74,962 and \$63,916 for the City of Stockton.

## ASSESSING DISPLACEMENT RISK IN STOCKTON: SAN JOAQUIN COUNTY GENTRIFICATION AND DISPLACEMENT MAPPING TOOL

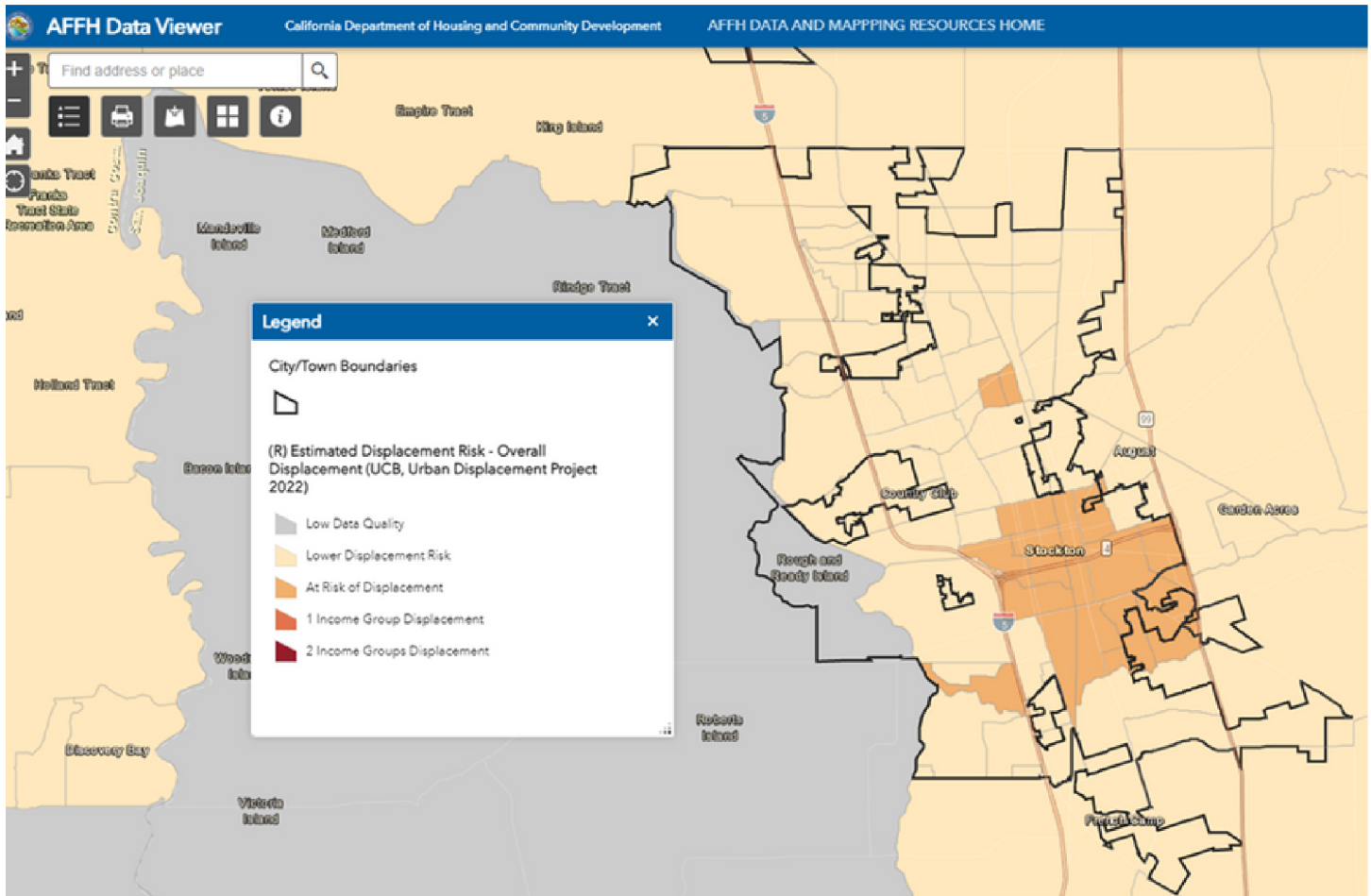


**Figure 6:** Gentrification and Displacement Assessment for San Joaquin County – 2010 Census Tracts susceptible to displacement

Ultimately, the Gentrification and Displacement Assessment Mapping Tool indicates that the following tracts are identified as either susceptible to (e.g. at risk of):

06077003404, 06077003311, 06077003406, 06077003407, 06077003307, 06077003409, 06077003313, 06077003312, 06077001400, 06077003113, 06077003111, 06077000900, 06077000300, 06077002401, 06077002402, 06077002300, 06077002201, 06077002202, 06077002100 or actively undergoing displacement and gentrification: 06077003308, 06077000401, 06077000402, 06077000100, 06077000700 and 06077003803

## ASSESSING DISPLACEMENT RISK IN STOCKTON: AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) DATA



**Figure 7:** California Department of Housing and Community Development Affirmatively Furthering Fair Housing Data Viewer

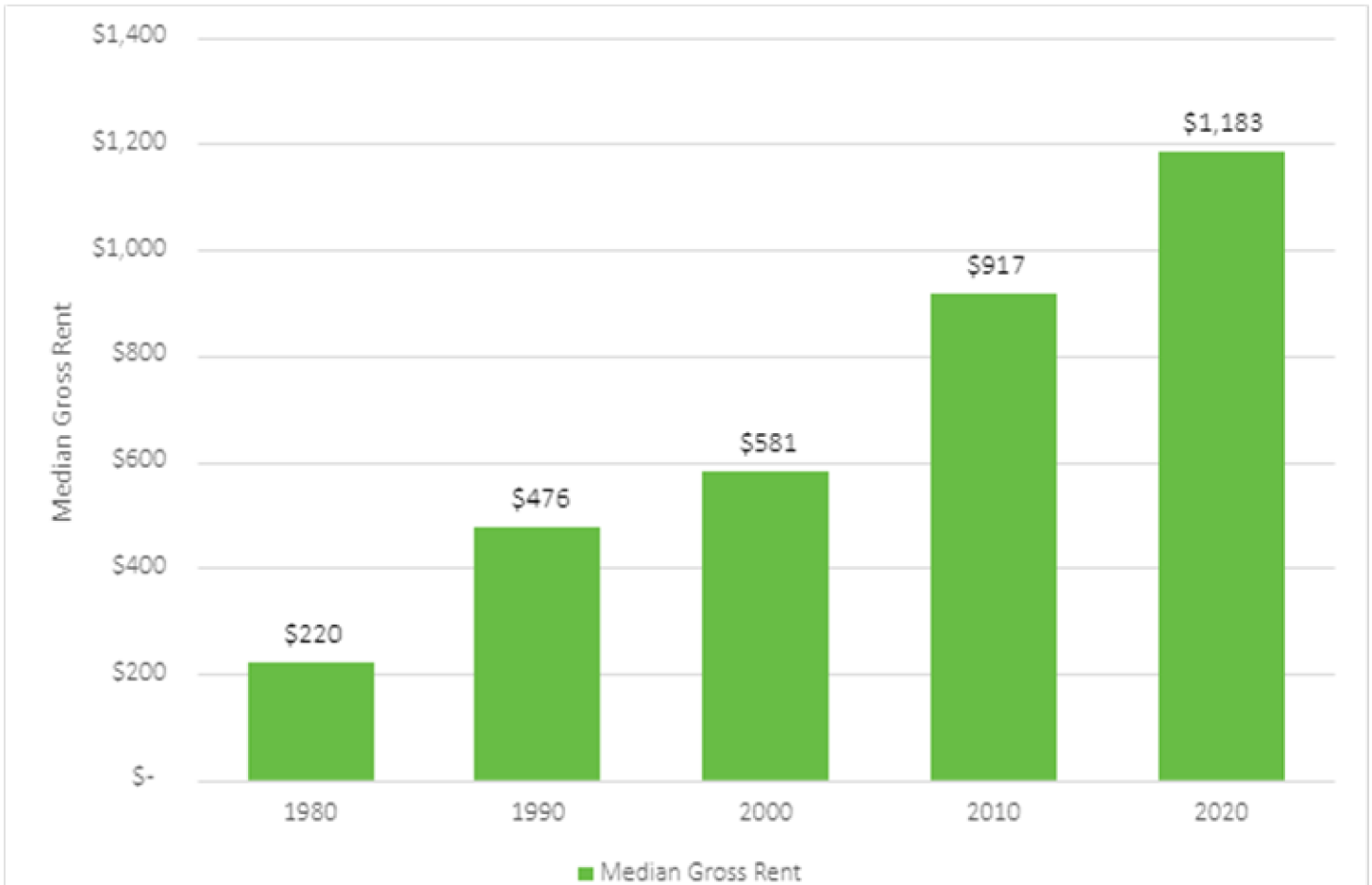
### Affirmatively Furthering Fair Housing Data Viewer

The UDP methodology is also used in a relatively new statewide mapping tool produced by the California Department of Housing and Community Development – the Affirmatively Furthering Fair Housing (AFFH) Data Viewer. This tool was developed to ensure cities and counties are fulfilling their obligation to prevent discrimination and increase access to affordable homes that are near essential services and resources. Its results support the risk assessment found in the San Joaquin County mapping tool. Figure 7 shows overall displacement risk for all

households, indicating general displacement risk for households south of Harding Way. This, generally, bolsters the findings in the San Joaquin County-specific mapping tool. The category “displacement risk” indicates census tracts with characteristics which are strongly correlated with more overall low-income population loss than gain.

Both mapping tools indicate that Stockton households face a continuum of risk as it relates to household displacement.

## ASSESSING DISPLACEMENT RISK IN STOCKTON: ADDITIONAL DATA INDICATORS



**Figure 8:** Median Gross Rent in the City of Stockton from 1980 – 2020. Source: U.S. Census Bureau, Census 1980(ORG STF3), 1990(STF3), 2000(SF3); ACS 06-10, 16-20 (5-year Estimates), Table B25064

### Additional Data Indicators

Additional data indicators noted below help to supplement the mapping tool assessments by highlighting certain data indicators related to displacement vulnerability.

Housing affordability, availability, and access continue to pose challenges for public agencies at all levels to address and are primary drivers behind a household's ability to secure and remain in stable housing. Housing affordability is generally defined as a household paying no more than 30 percent of its total income toward housing costs. Figure 8 shows a steady rise in Stockton rental prices

(median gross rent) since 1980 – rental prices are highlighted because renter households tend to have a higher risk for displacement and less control over rental price escalations). From 2019 to 2020 housing prices increased an average of 7.3 percent across the City of Stockton (Policy Map – Federal Housing Finance Agency).

## ASSESSING DISPLACEMENT RISK IN STOCKTON: ADDITIONAL DATA INDICATORS



Photo credit: Rich Pedroncelli

### Cost-burdened Households (ACS 2017-2021)

From 2017 to 2021, the estimated percent of all renters who are cost-burdened during this time period was over half at 55 percent (PolicyMap – 2020 Census, ACS 2017 - 2021). This is a higher percentage than both San Joaquin County and the State of California (Figure 9).

Among homeowners, this estimate is significantly lower at 28 percent. Cost-burdened households have limited resources available to contribute to other household expenses like groceries, healthcare and transportation. This can contribute to a decrease in housing stability and increase displacement risk.

	City of Stockton	Percent	San Joaquin County	Percent	California	Percent
Cost-burdened Households	26,486	55.5%	50,182	51.4%	3,019,235	51.5%

**Figure 9:** Percent of Cost-Burdened Renter Households, City of Stockton, San Joaquin County and State of California. ACS 2017-2021.

## ASSESSING DISPLACEMENT RISK IN STOCKTON: ADDITIONAL DATA INDICATORS

**Overall Number of Homeless Persons Counted**

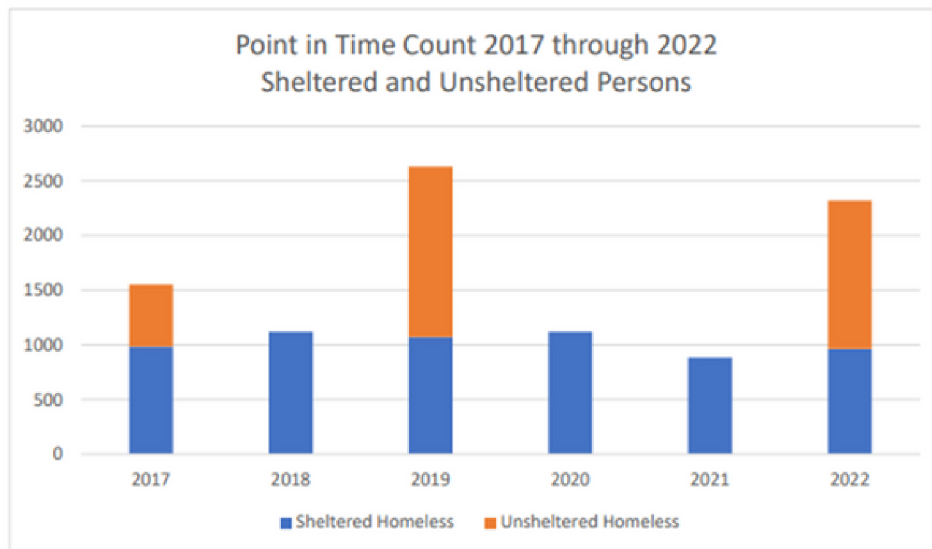


Figure 1.1

**Underlying Data — Sheltered and Unsheltered PIT Counts**

	2017	2018	2019	2020	2021	2022
Sheltered Count	985	1,118	1,071	1,119	885	964
Unsheltered Count	567	NA	1,558	NA	NA	1,355
Total Count	1,552	1,118	2,629	1,119	885	2,319

**Figure 10: San Joaquin County Point in Time Count – 2022 Report**

One of the most negative outcomes facing displaced residents and households is the risk of losing access to shelter. Figure 10 highlights a trend analysis and count data of San Joaquin County’s Point In Time (PIT) count of sheltered and unsheltered persons. The County’s Continuum of Care (CoC) notes that the number of unsheltered homeless, according to the PIT Count, dropped by 13 percent between 2019 and 2022. This decline may be attributable to the impact of countywide homelessness prevention efforts that were undertaken in 2020 with the onset of the COVID-19 pandemic. These efforts include additional emergency shelter beds and rapid re-housing programs, and the development of permanent affordable housing in the City of Stockton.

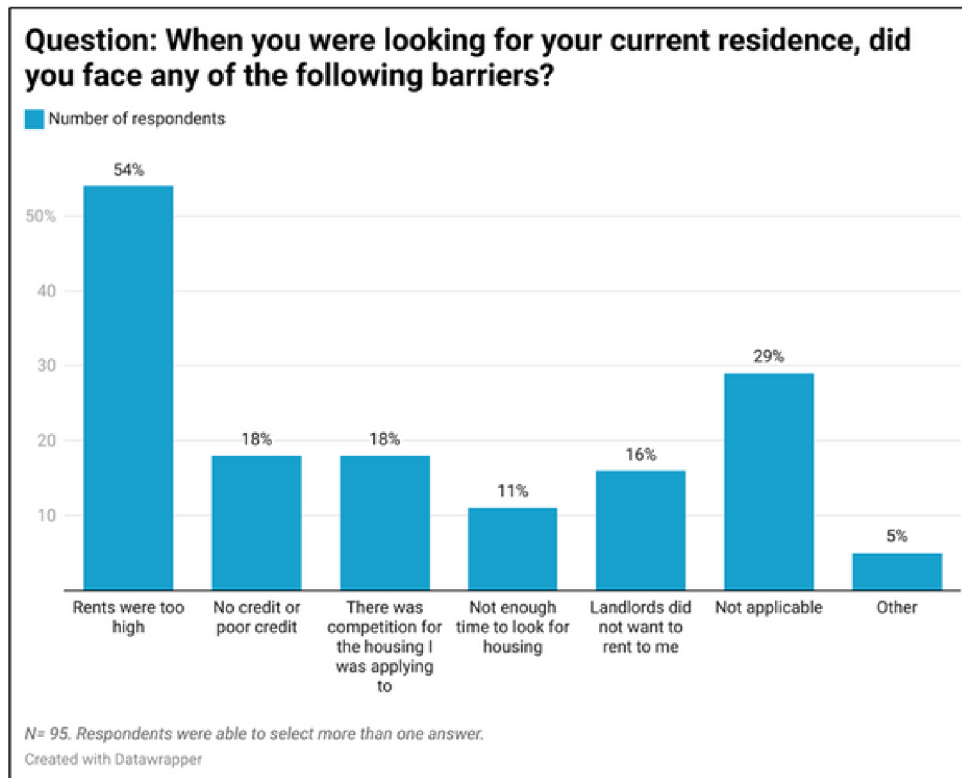
However, the CoC does caution that a COVID-19 surge at the time of the 2022 count may have resulted in an under-count, particularly among the unsheltered population as the canvassing team could not cover all communities within San Joaquin County and may have dissuaded some individuals from identifying as unsheltered. The report states that it is likely 2022 numbers are still on par with 2019’s and that, “homelessness seems to be more visible in 2022 than in 2019.”

# COMMUNITY OUTREACH

The results of the mapping tool and the data indicators echo both feedback received from community stakeholders working to combat housing insecurity in Stockton as well as results from a survey conducted from October 2022 to March 2023 as part of the City of Stockton's Transformative Climate Communities program award (TCC).<sup>4</sup> This survey was publicly available and offered at various community events and meetings with the intent of identifying challenges residents face when searching for and securing stable housing. While the investments from the TCC program are intended to be focused within a specific neighborhood, the survey was accessible

to all Stockton residents, with a majority of respondents residing within the 95206 zip code at the time they submitted their survey response.

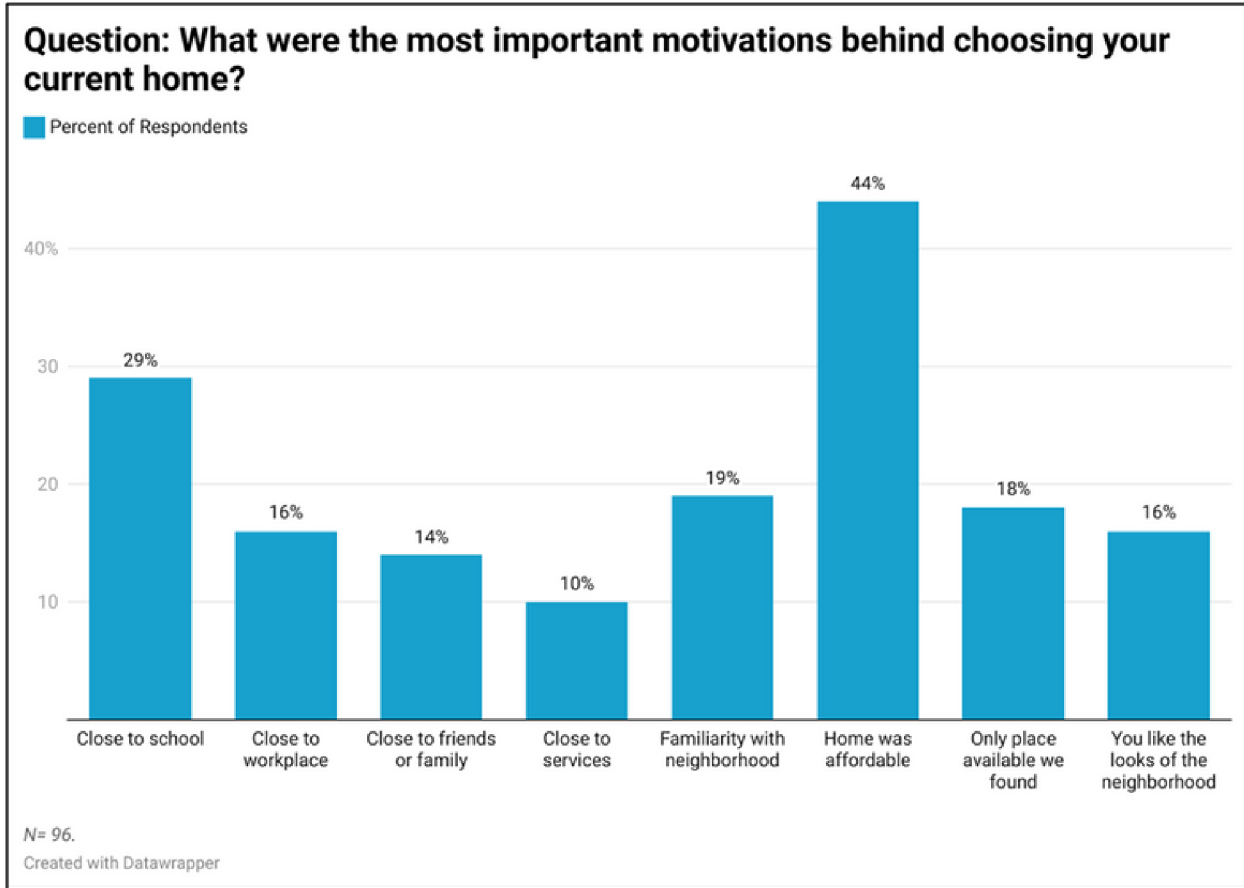
Figure 11 shows that among survey respondents, high housing prices, rental prices specifically, were the single largest barrier in being able to secure housing as well as a perceived reluctance of landlords to rent to households holding Section 8 vouchers, which was written into respondent comments. This second barrier remains despite the 2018 passage of legislation that legally bans source of income discrimination in California.



**Figure 11: Displacement Survey Results - Housing Access Barriers**

<sup>4</sup> In 2020, the City of Stockton was awarded \$10.8 million in Transformative Climate Communities (TCC) funds. The TCC program, administered by the California Strategic Growth Council, aims to coordinate multiple community-scale climate investments to reduce greenhouse gas emissions and further California's climate goals. As part of its funding award, the City is required to produce a TCC Displacement Avoidance Plan. Efforts were made to coordinate both the TCC and Citywide outreach efforts related to displacement mitigation. Enterprise Community Partners serves as the consultant on both displacement efforts and the survey results are informing both reports.

## COMMUNITY OUTREACH: COMMUNITY FEEDBACK - STAKEHOLDER INTERVIEWS



**Figure 12:** TCC Survey Results - Home Selection Motivations

The survey also indicated that housing selection is largely driven first by affordability, followed by proximity to different community amenities such as schools (Figure 12). Other notable takeaways include pet ownership as a self-stated barrier to securing housing and a general lack of awareness surrounding steps the City of Stockton may be taking to address displacement risk and improve housing access.

### Stakeholder Interviews

A list of all twelve organizations interviewed as part of this assessment process can be found in the appendix.

### Housing Diversity

Emerging themes included a general desire for increased housing production, particularly at prices affordable to lower-income households. Challenges tied to a lack of diversity among types of housing was also a consistent theme across interviewees. Stockton's current housing stock is predominantly made up of single-family homes and little is perceived to be available to lower-income households – relatively few of these units are rent-restricted in any formal way. In addition to the lack of diversity across housing options, interviewees noted that despite much of the city's rental stock being comprised of single-family homes, there is a severe lack of homeownership opportunities for households otherwise interested.



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## COMMUNITY OUTREACH: COMMUNITY FEEDBACK - STAKEHOLDER INTERVIEWS

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### *Housing Quality*

Feedback around the City's current rental inspection and code enforcement process surfaced multiple times during interview conversations. Community stakeholders feel that a large contributor to increased displacement risk for Stockton households includes residents living in deteriorated or unsafe housing stock. Many smaller landlords do not have sufficient capital to cover the cost of identified improvement needs. This can result in the displacement of residents from existing housing that remains unsafe. Many tenants also refrain from filing formal complaints about the condition of their unit due to fear of landlord retaliation and ultimately losing their housing. One interviewee described a variety of instances where landlords refuse to make improvements and/or repairs in instances where the tenant holds a housing choice voucher. This then results in the local housing authority stopping rental payments and results in a loss of housing for the tenant.



*Photo credit: Visionary Home Builders*

### *Eviction Impacts*

Other contributors to displacement risk include ongoing evictions. All organizations interviewed that interface with either landlords or tenants described fielding frequent questions around eviction filings and request for legal assistance. Interviewees described anecdotal instances of evictions occurring, despite the City's eviction prohibition ordinance enforced during the COVID-19 pandemic, in concurrence with rising home values so property owners could recoup increased value through the sale of the property. Evictions were also noted by survey respondents as a reason for being unable to secure subsequent housing after their eviction as many landlords will not rent to households with prior evictions.

### *Economic Security*

Other linkages to displacement included the lack of living-wage employment opportunities available to residents. Many housing-insecure residents are employed, but remain unable to afford existing housing costs. As one interviewee described, "One emergency can put a household over the edge." Interviewees described a circular challenge where residents are unable to access higher wage jobs and remain under skilled, which continues to prevent businesses that require certain skills from locating within Stockton or offering employment opportunities to City of Stockton households. This furthers the economic insecurity faced by Stockton households and contributes to overall housing insecurity.

# RECOMMENDATIONS AND CASE STUDIES



Photo credit: Max Whittaker

In alignment with other local displacement mitigation plans (Stockton's Transformative Climate Communities' Displacement Avoidance Plan and the San Joaquin County Community, Diversity and Displacement Study) and based on both the quantitative analysis as well as quantitative feedback, three primary policy and programmatic recommendations are being put forth for the City to consider.

### *Re-alignment of existing code enforcement program to reflect a proactive model*

Many interviewees indicated that improved code enforcement policies would advance city goals around ensuring residents have access to safe and sanitary housing. In instances where housing quality made be in violation of health and safety standards, feedback indicated that residents may be reluctant to file a formal complaint out of fear of landlord retaliation.

The City's existing Residential Rental Inspection Program website states that all residential units within the city are inspected once every five years. The program also allows for qualifying properties to participate in a self-certification program. This process reduces the number of on-site inspections required by staff, but stakeholders indicated it also provides a problematic loophole for landlords and property owners that defer needed maintenance. It can result in a failure to identify instances of violations.

Some communities are increasingly turning to what is often referred to as a "proactive" model of code enforcement. This type of program can allow for anonymous reporting and helps to prevent the burden of reporting from falling on residents. This is accomplished through ensuring regular, mandatory

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## **RECOMMENDATIONS AND CASE STUDIES: PROACTIVE CODE ENFORCEMENT**

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inspections of units (and often by limiting a property owners' ability to continually self-certify compliance). In addition, for older rental housing stock, this type of code enforcement model can help identify health and safety violations before the home falls into severe disrepair through these routine, mandatory inspections.

### **Case Study: City of Fresno - Proactive Code Enforcement**

In 2017, the City of Fresno enacted the Rental Housing Improvement Act which helped establish a formal database of rental properties, restructured the City's existing rental inspection program to a more proactive model, and provided tenant education services. Prior to the passage of this Act, local housing advocates worked with the City to create a more proactive enforcement process including more routine inspections of rental units (a minimum of at least one unit from every registered property owner within a five-year period).

When the Rental Housing Improvement Act went into effect, the City of Fresno required all residential rental properties to register in a new online database and update ownership and registration information whenever there is a change of ownership or contact information. The City does allow some property types to be exempt from this registration process including, "Owner-occupied, mobile home parks, vacant units, hotels, motels, licensed medical or care facilities, educational, religious and medical institutions." These are fairly standard types of exempt properties.

For properties and units that are non-exempt, registration must be submitted within 30-days of change of ownership. To encourage compliance, a fee schedule was also

developed (though registering properties itself is free). As part of this program, the city also charges owners \$100 per unit for a baseline inspection (pursuant to a random sampling formula, to determine whether violations of Health and Safety Standards exist) and sets additional late fees for failing to register, re-inspect, or for accruing violations.

The Baseline Inspection applies to all rental units (except those listed above) and though based on random sampling formula, prioritizes the following but states that it is within the City's sole discretion to determine the order in which it will conduct baseline inspections of Residential Rental Units:

- The City shall have the right to select first for inspection those Properties it has identified as frequent health and safety code violators, and/or Residential Rental Properties within a given census tract or precinct, using statistical and case information, including data compiled from FresGo, census data, and other data sources.
- Subject to these criteria, the City may next prioritize multi-family Properties of two units or more, and single-family homes used as rental properties that are known frequent health and safety violators.
- As a third priority, the City may conduct baseline inspections of remaining single-family homes used as rental properties. It is within the City's sole discretion to determine the order in which it will conduct baseline inspections of Residential Rental Units.

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<sup>4</sup>City of Fresno, ARTICLE 16 - RENTAL HOUSING IMPROVEMENT ACT

## RECOMMENDATIONS AND CASE STUDIES: PROACTIVE CODE ENFORCEMENT

According to Figure 13, landlords with more units are likely to have a smaller percentage of units inspected. However, as noted above, the City has the ability to prioritize and/or reinspect units that fail the Baseline Inspection or are known to be frequent health and safety violators.

Multi-Family Rental Units	
1 Unit	100% Inspection
2-4 Units	50% Inspection
5-15 Units	25% Inspection
16-50 Units	15% Inspection
51+ Units	10% Inspection
Single-Family Rental Units	
1 Home	100% Inspection
2-9 Homes	50 Inspection
10-20 Homes	30% Inspection
21-49 Homes	20% Inspection
50 Homes or More	10% Inspection

**Figure 13:** Number of Units Subject to Inspection for Baseline and Routine Inspections

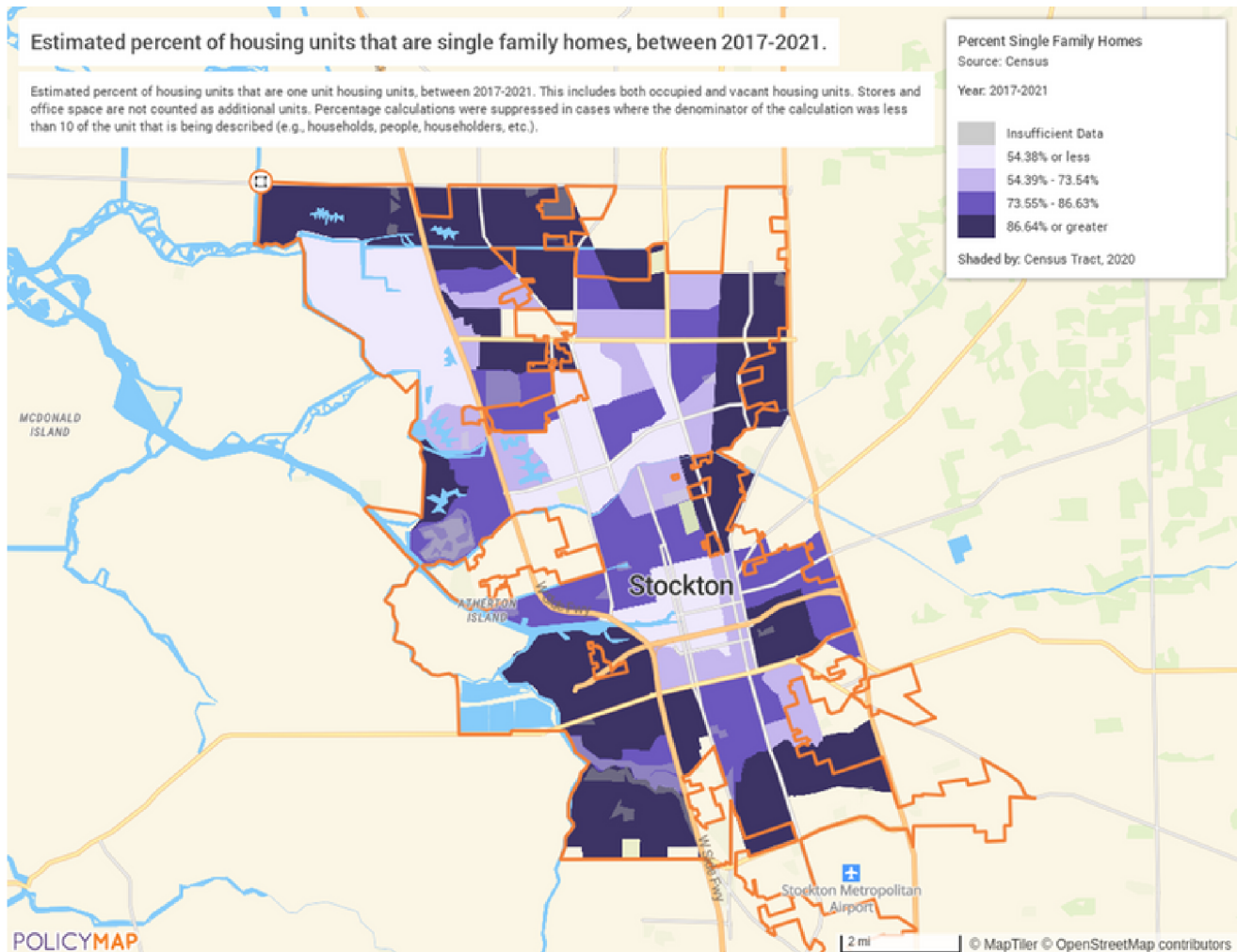
As noted above, the City utilizes “FresGo” which allows users to report issues related to graffiti, illegal dumping, potholes, sidewalk, roadway, landscaping, water, sewer, solid waste, or parking issues anonymously. The anonymous aspect is critical in ensuring that residents can file complaints without fear of landlord retaliation.

Another component of the Rental Housing Improvement Act is education. The city currently provides information for tenants and landlords including:

- Legal Aid providers
- Eviction Process Overview
- Court forms and general eviction information
- Living conditions and habitability (brochures, municipal code, civil code)

Generally, the Act has been helpful in addressing code violations. To ensure efficiency, this Act was reviewed yearly for the first three years of implementation and shall be reviewed every five years thereafter. Amendments were made to the program in 2021. These included provisions that allow code inspectors to inspect more units at properties where baseline inspections reveal violations, the reduction of extensions available to landlords who need to resolve issues from 90 to 45-days, an increase in fines and penalties applicable to landlords who fail to register properties with the City or update accounts upon property sale and the removal of the City’s self-certification program.

## RECOMMENDATIONS AND CASE STUDIES: SUPPORT DIVERSIFYING EXISTING HOUSING STOCK



**Figure 14:** Estimated Percent of Single-Family Homes by Census Tract, 2017-2021

Stakeholder feedback and data indicate that there is a lack of diversity among available housing types within the City of Stockton. Data collected from the TCC Displacement Avoidance Plan shows that many census tracts in mid- and South-Stockton neighborhoods are overwhelmingly comprised of single-family homes. This lack of housing diversity constraints affordability and prevents a range of options that, in turn, offer a range of price points for residents to choose from. As the City of Stockton develops its Housing Action Plan and Housing Element, considering flexible zoning, infrastructure upgrades (to typical

infrastructure such as sewer and water, but also considering local transit and amenity needs to help attract development), and bolstering prior first-time homebuyer programs can all facilitate the ability for residents to afford different housing types and assist developers in offering more than one kind of unit type.

## RECOMMENDATIONS AND CASE STUDIES: SUPPORT DIVERSIFYING EXISTING HOUSING STOCK

### Case Study: City of Birmingham - Diversifying Housing Stock

The City of Birmingham (AL) intends to address the need to diversify its housing stock through the City of Birmingham Housing Plan.<sup>5</sup> The plan identifies the following goals to provide existing residents with high quality and equitable housing and attract new residents:

- Incentivize “Missing Middle” Housing (for example, housing typologies between single-family dwellings and large multi-unit complexes that offer a range of price and affordability options)
  - Address potential barriers to development, including single-use zoning standards that may limit the construction of multi-family housing, parking requirements, or a multi-layered regulatory process.
  - Expand the use of character-based code beyond existing overlay districts to decrease barriers to the development of in mid-sized housing, including duplexes, triplexes, fourplexes, and townhouses
  - Streamline the ability to build accessory dwelling units in residential zoning districts
  - Provide incentives, such as vacant land or development subsidies to increase the construction and renovation of small to mid-sized multi-family units for rental and homeownership.
- Leverage Catalytic Projects for New Affordable Housing Production
  - Support infill development near major investments and transformative projects, such as improvements to the Red Rock Trail System and Bus Rapid Transit Line in transitional neighborhoods.

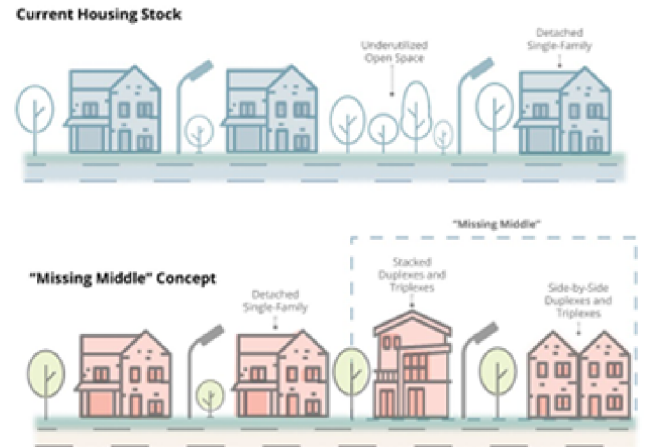


Photo credit: City of Birmingham

- Invest in First-Time Homebuyer Assistance Projects
  - Re-establish Homebuyer Assistance Program
  - Support financial literacy and savings accounts
- Increase Strategic Partnerships (for example, Community Housing Development Organizations (CHDO)s, private and non-profit developers, and philanthropic entities to support Low Income Housing Tax Credit (LIHTC) and similar mixed-income projects)
  - Work with organizations interested in becoming CHDOs to become certified and provide technical assistance to interested organizations.
  - Expand access to operating and capacity-building funds for CHDOs
  - Continue to pursue LIHTC projects with qualified developers.

<sup>5</sup>City of Birmingham Housing Plan 2020. <https://www.birminghamal.gov/cob-housing-plan/>

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## RECOMMENDATIONS AND CASE STUDIES: SUPPORT AND/OR EXPAND EXISTING LEGAL-AID AND TENANT-LANDLORD EDUCATION PROGRAMMING

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As the Policy Inventory shows, there is a lack of tenant-protection-oriented policies overseen by the City of Stockton relative to initiatives that support housing production and preservation. Protection policies focus on maintaining neighborhood stability by keeping residents housed. One of the primary requests heard from stakeholders was the beneficial impact that legal representation can have on households facing formal eviction filings in terms of keeping them housed. We recommend that the City consider funding a pilot to provide legal aid services to those facing housing instability. Some pandemic-related resources were provided to local legal-aid organizations to help provide additional staff to address an increase in evictions but this funding has since run out.

### Case Study: City of Denver - Local Legal Aid Program

In 2018, all thirteen members of the Denver City Council donated a combined \$131,500 from their office budgets and made personal contributions to launch the Denver Eviction Legal Defense Pilot.<sup>6</sup> The pilot was initiated as a response to low percentages of tenants with legal representation and aimed to help those facing eviction stay housed or reduce the barriers for evicted tenants to find future housing. Through this pilot, 398 clients from 49 Denver zip codes were served. Following the pilot, the program was transitioned to a formal City-funded program with expanded funding each year since and new initiatives to expand the number and nature of providers, with a goal of reaching all renters earning below 80% of Area Median Income facing eviction (\$75,520 annual earnings for a family of 3 in 2021).

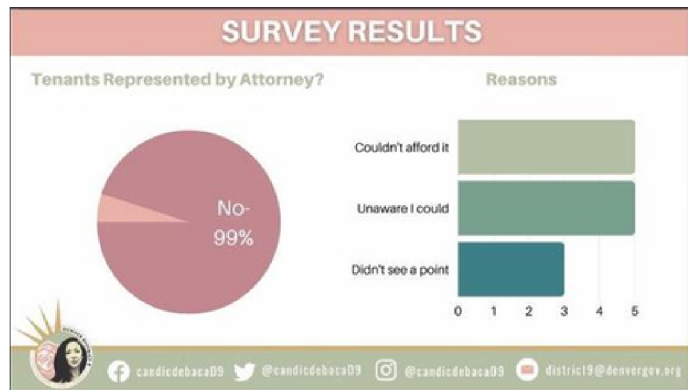


Photo credit: Councilwoman Candi CdeBaca (Denver)

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In 2022, the Denver City Council approved \$1,500,000 in American Rescue Plan Act (ARPA) funds to expand eviction legal defense resources (through 2023), for low- and moderate-income tenants. Legal resources are currently available through nonprofit partners that contract with the Denver Department of Housing Stability (HOST).

Additionally, as required by Article XI Required Disclosures Sec. 27-240 (b),<sup>7</sup> Landlords must provide written notice of Denver Tenant Rights & Resources<sup>8</sup> which includes information on how to access free eviction legal resources through the city funded program and partners.

<sup>6</sup> Denver Eviction Legal Defense Pilot. <https://drive.google.com/file/d/1pDm5Yde1qE9zUL4WLQ5OzyUbeqUI4Nqa/view>

<sup>7</sup> Denver Code of Ordinances. ARTICLE XI. - REQUIRED DISCLOSURES Sec. 27-240. - Eviction and foreclosure resource.

<sup>8</sup> Denver Tenant Rights and Resources. <https://www.denvergov.org/files/assets/public/city-council/documents/d11/2022-tenant-rights-and-resources-document-english.pdf>

# Appendix

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## APPENDIX A: POLICY MATRIX

Increasingly, mitigating displacement risk is being prioritized by funding programs that support affordable housing development. Both the Affordable Housing and Sustainable Community and Transformative Climate Communities programs require prospective applicants to identify potential displacement risks facing residents and to identify specific policy interventions that may be in place to prevent such risk. The policy matrix assesses existing policies and programs within the City of Stockton that meet these programs' requirements.

Anti-displacement policies and programs	Existing policies and programs
<b>Production</b>	
Incentives for inclusionary zoning*	
Density bonus ordinance*	•
Community land trusts	
Fee on new commercial or residential development that is dedicated to affordable housing	
Land banking	
Development of new accessory dwelling units	•
Neighborhood preference legislation that gives existing residents within a certain circumference preference for newly built affordable units*	
Dedication of a certain percentage of housing bond to building housing in a Transformative Climate Communities Project Area	•
Site acquisition and fee deferrals to develop 100% affordable housing*	
Production of family-sized rental and ownership affordable units	•
Allow affordable housing on a limited number of underutilized Production, Distribution and Repair (PDR) parcels with a ground floor requirements for PDR*	
Housing bond to fund affordable unit development	

## APPENDIX A: POLICY MATRIX

Anti-displacement policies and programs	Existing policies and programs
Preservation of Affordable Housing	
Rent control, stabilization ordinances, and rent review boards*	•
No-net loss of affordable housing units / net gain of affordable units*	
Preservation of existing affordable housing in the Project Area through the one-for-one redevelopment of distressed public housing; right-to-return policies for existing residents in good standing in redeveloped public housing; and commitment not to raise rents above pre-redevelopment levels for existing residents in redeveloped buildings*	
Policies to preserve single-room occupancy and/or mobile home parks and to allow current residents in good standing to remain or return in the case of redevelopment*	
Condominium conversion restrictions*	
Demonstration of application to local, state, and federal programs to fund preservation of affordable housing	•
Preservation of affordable housing via acquisition and rehabilitation programs*	
Covenants to maintain affordability in perpetuity	
Community land trusts	
Restrictions on short-term rentals*	
Restrictions on non-primary residences*	

## APPENDIX A: POLICY MATRIX

Anti-displacement policies and programs	Existing policies and programs
Tenant Protections and Support	
Tenant anti-harassment policies	
Right-to-return policies for existing households	
Source of income non-discrimination*	
'Just Cause' eviction policies	
Limiting of low-fault evictions*	
Culturally appropriate tenant rights education	
Funding for tenant organizing	
Tenant legal services and right to council in eviction proceedings	
Limiting tenant evictions from affordable housing*	
Maximize acceptance of rental subsidies*	
Review of occupancy requirements to create greater flexibility for tenants*	●
Identify opportunities to master lease privately owned and managed SROs*	
Increase supportive services to tenants living in SROs that are not managed or master leased by the City or non-profits	●
Identify opportunities to acquire privately owned and managed SRO buildings	
Improve code enforcement in SROs*	

## APPENDIX A: POLICY MATRIX

Anti-displacement policies and programs	Existing policies and programs
<b>Tenant Protections and Support</b>	
Implement guidelines to prioritize moving families from SROs into affordable housing units*	
Tenant’s first right to purchase legislation*	
Preserve rent-control units when major rehabilitation occurs*	
Where applicable, assessing enforcement of nuisance policies and modifying as needed to ensure vulnerable populations are not being negatively impacted.	
Create an emergency housing response action plan for instances when code enforcement deems the properties uninhabitable	
<b>Neighborhood Stabilization and Wealth Building</b>	
Asset building opportunities for low-income residents	●
Contracting with local/small/diversely owned businesses	
Development and promotion of micro-lending opportunities	●
Development of worker cooperatives	
Non-speculative homeownership opportunities	
*Indicates policies that require local municipalities participation to implement	

## APPENDIX B: STAKEHOLDER INTERVIEW LIST

Name	Organization
Jon Mendelson	Central Valley Low Income Housing Corporation
Jonathan Pruitt	Catholic Charities (former)
Tanisha Raj	Catholic Charities
Fred Sheil	STAND Affordable Housing
Peter Ragsdale	Housing Authority of the County of San Joaquin
Carol Ornelas	Visionary Home Builders
Irene Calimlim	Little Manila Rising
Pandora Crowder	Conway Homes Resident Council/Resident
Anthony Robinson	The Echo Chamber
Darryl Rutherford	Reinvent South Stockton Coalition (former)
Robert	San Joaquin Fair Housing
Monica Sousa	California Rural Legal Assistance
D'Adrea Davie	NAACP

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## APPENDIX C: STAKEHOLDER INTERVIEW GUIDE

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### BACKGROUND

In 2021, the City of Stockton was awarded 10.8M from the State for a program called the Transformative Climate Communities Program. Part of the requirements tied to this funding involves the City developing a “Displacement Avoidance Plan.” This plan needs to identify displacement vulnerabilities of households and businesses within a specific project area. It also needs to recommend at least two policies the City could implement to mitigate displacement risk for residents.

### INTERVIEW QUESTIONS

- How long have you and/or your organization served/worked with residents in Stockton?
- How would you describe housing stability for those you serve?
- Are there any themes as to what is causing potential housing stability/displacement risk for those you work with?
- Have these themes/indicators changed over time?
- Are you aware of any policies at the City level that can help mitigate displacement risk?
- What types of policies or programs would you like to see implemented, that you feel would be valuable with regards to mitigating displacement?
- What benchmarks or outcomes would you like to see that would be a good way to measure progress toward mitigating displacement?

### CDD COMMENTS

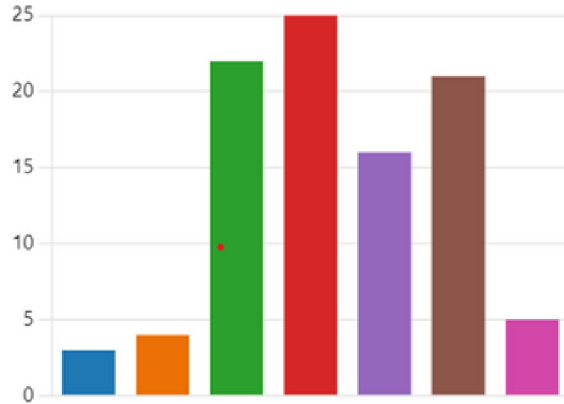
- Consider broader neighborhood stabilization, scaling up beyond just the parcel level, what are options if faced with housing security (might be good for Fair Housing), what are interventions that elevate neighborhood vs. Gentrification, what is the tipping point for choosing to re-locate, women’s center as interview org.

# APPENDIX D: COMMUNITY SURVEY RESULTS

## 1. What is your age?

[More Details](#)

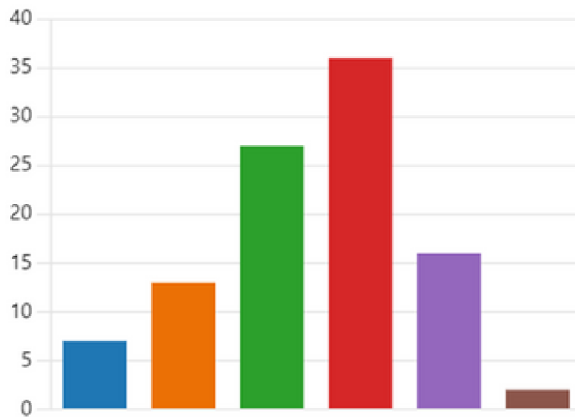
● 17 and under	3
● 18-24	4
● 25-34	22
● 35-44	25
● 45-54	16
● 55-64	21
● 65+	5



## 2. What is your race or ethnicity?

[More Details](#)

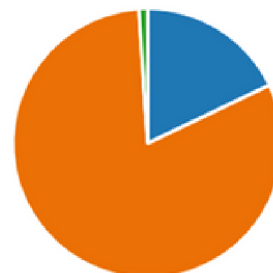
● American Indian/Native Hawaiian	7
● Asian/Pacific Islander	13
● Black or African American	27
● Hispanic/Latino	36
● White	16
● Other	2



## 3. What is your gender?

[More Details](#)

● Male	17
● Female	77
● Non-binary	1
● Prefer not to answer	0

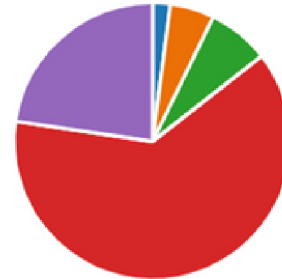


## APPENDIX D: COMMUNITY SURVEY RESULTS

4. What zip code do you currently live in? Please select one.

[More Details](#)

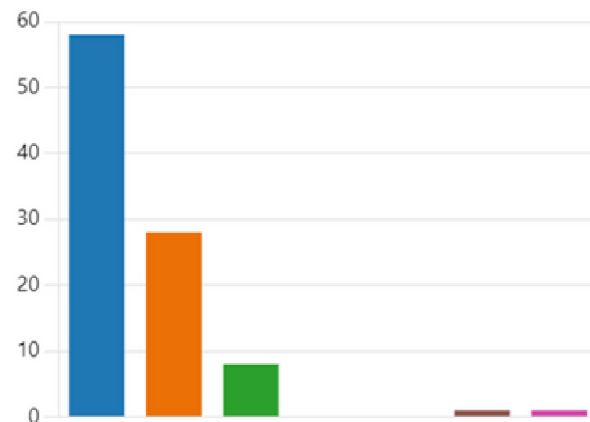
● 95202	2
● 95203	5
● 95205	7
● 95206	61
● Other	22



5. What best describes your current housing situation? Please select one.

[More Details](#)

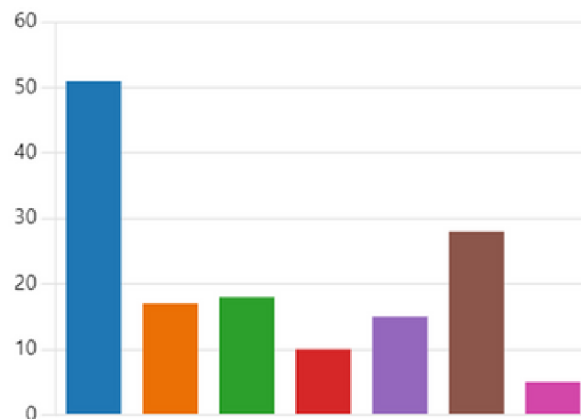
● Renter	58
● Homeowner	28
● Living with family or friends	8
● Living in a shelter	0
● Living in a hotel/motel	0
● Unhoused	1
● Other	1



6. When you were looking for your current residence, did you face any of the following barriers? Check all that apply.

[More Details](#)

● Rents were too high	51
● No credit or poor credit	17
● There was competition for the h...	18
● Not enough time to look for ho...	10
● Landlords did not want to rent t...	15
● Not applicable	28
● Other	5

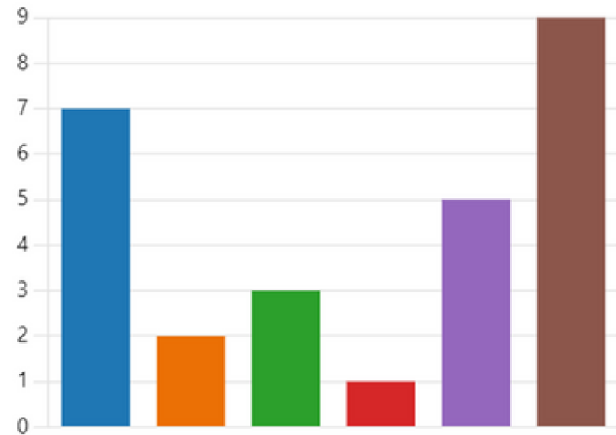
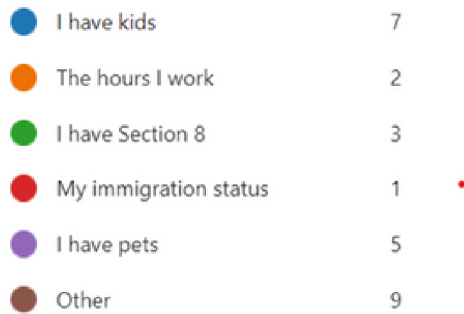




## APPENDIX D: COMMUNITY SURVEY RESULTS

7. If you selected "Landlords did not want to rent to me" in Question 6, please check all that apply.

[More Details](#)



### WRITE IN ANSWERS FOR "OTHER"

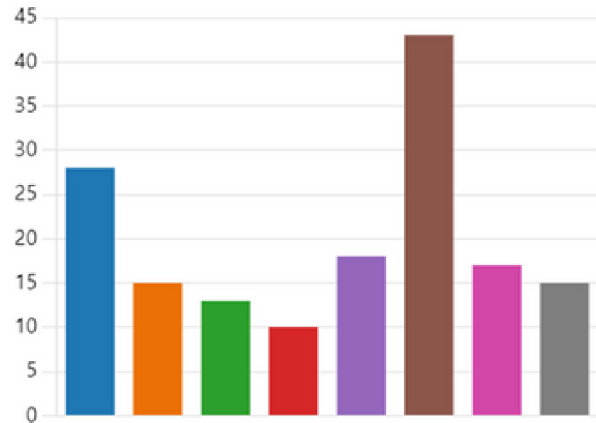
1	None
2	Eviction notice
3	My income
4	Work history gaps
5	N/A
6	Income
7	Disabled
8	N/A

## APPENDIX D: COMMUNITY SURVEY RESULTS

8. What were the most important motivations behind choosing your current home? Select all that apply.

[More Details](#)

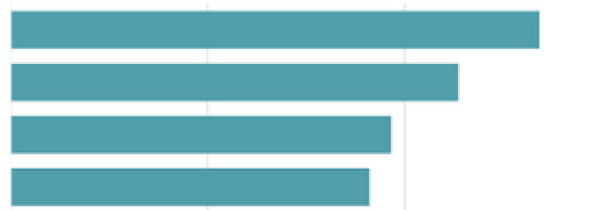
<span style="color: blue;">●</span> Close to school	28
<span style="color: orange;">●</span> Close to workplace	15
<span style="color: green;">●</span> Close to friends or family	13
<span style="color: red;">●</span> Close to services	10
<span style="color: purple;">●</span> Familiarity with neighborhood	18
<span style="color: brown;">●</span> Home was affordable	43
<span style="color: pink;">●</span> Only place available we found	17
<span style="color: gray;">●</span> You like the looks of the neighb...	15



9. Which of these categories would you consider the highest priority for avoiding displacement pressures? Please rank from 1 through 4, 1 being the highest priority. *To learn more about programs and policies in each category, visit [https://sgc.ca.gov/programs/tcc/docs/20191104-TCC Guidelines Round 3 Final.pdf](https://sgc.ca.gov/programs/tcc/docs/20191104-TCC_Guidelines_Round_3_Final.pdf)*

[More Details](#)

- 1 **Building new affordable housi...**
- 2 **Preserving existing housing t...**
- 3 **Tenant Protections and Support**
- 4 **Neighborhood Stabilization a...**



10. Are you aware of any strategies or policies that have been implemented in your community to increase the supply, stability, and/or affordability of housing?

[More Details](#)

[Insights](#)

<span style="color: blue;">●</span> Yes	17
<span style="color: orange;">●</span> No	79



## APPENDIX D: COMMUNITY SURVEY RESULTS

11. If you answered yes to the previous question, which strategies or policies are you aware of?

1	Fee deferrals, emergency eviction moratorium, rental assistance
2	Create incentives to allow smaller ma and pap landlords to bridge the gap in financing smaller projects. Or new landlords who want to start a business to create housing in their local towns. More financial support and to bridge the gap with grant opportunities.
3	rising sun helped with water conservation and provided water saving appliances
4	New Housing Element kicked off by the city. A zoning change affecting parcels throughout the city.
5	More housing programs for the homeless.
6	More low income housing had been built in my neighborhood and more are being built.
7	Different federally funded programs for disabled, low income and chronically homeless individuals and families.
8	Turning areas and buildings into shelter for homeless
9	project homekey
10	HomeKey
11	Coming around more
12	all good
13	HACSI Building New Affordable Housing
14	Free Financial management help, new apartment construction

## APPENDIX D: COMMUNITY SURVEY RESULTS

12. Have you ever felt like an environment or climate related issue (e.g. flooding, heat, air pollution, etc.) has impacted your home/where you live?

[More Details](#)



13. If you answered yes to the previous question, what environment or climate-related issues has impacted your home/where you live?

1	Extreme heat, drought, flood potential.
2	The central valley has always suffered from the smoke of California wild fires. and Fog it make's living in the central valley difficult.
3	fires have caused me to run the air because I can't leave the windows open
4	Flood/mold
5	Poor air pollution in 95205
6	It will - Levee
7	Air pollution (smoke)
8	Air pollution + water quality

## APPENDIX D: COMMUNITY SURVEY RESULTS

9	Droughts have impacted our water usage
10	Air (smoke)
11	Second hand smoke in previous apt
12	Air pollution from port and freeway
13	My house gets moldy and my foundation is lopsided i think because soil isn't healthy underneath the house because the extreme weather shifts do to climate change
14	Heat, air quality (bad-fair), flood!
15	Air pollution and noise
16	Heat
17	Environmental Racism due to redlining and other policies led to being housed in areas with poor air quality which has a negative impact on already marginalized, low income neighborhoods.
18	Smoke from fires, dust from fields
19	Flood, homelessness in shopping center directly behind our home.
20	extreme heat / utility bills

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## APPENDIX D: COMMUNITY SURVEY RESULTS

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21	Air quality in our region affects our health.
22	Heat Islands, flooding, air pollution from fires and highways
23	Smoking, Air not clean, water issues (water & garbages that tenant got to pay)
24	Mis vecinos fuman mucho
25	cold
26	Inundaciones
27	el calor
28	Mold and roaches
29	Entire block is having flooding in basement from rains. Extreme heat is causing trees to fall. Lack of water for trees in landscape strip and city not caring for them has led to many being chopped down. Losing our tree cover in the area which is tragic. Costs of gas a concern for keeping things cool in summer with no shade protection.

# APPENDIX E: DENVER EVICTION LEGAL DEFENSE PILOT



## DENVER EVICTION LEGAL DEFENSE PILOT



### Pilot Origins

All thirteen Denver City Council members have pooled \$131,500 in donations from their office budgets and a personal contribution to launch a pilot eviction defense program for Denver Residents. The program will be coordinated by Colorado Legal Services, which has decades of experience providing eviction defense to a small number of very vulnerable clients living in public housing or utilizing vouchers. The program will also utilize networks of volunteer lawyers and make other referrals. Strong community demand for legal defense funding emerged during the development of Denver's Housing Plan, and was a priority for stakeholders convened by the City Council Housing and Homelessness Work Group.

### Why Legal Representation?

- Denver tenants are represented by an attorney in only 1-3% of the cases involving major landlords, while landlords were represented in virtually 100% of the same cases. (*Research by the Colorado Center on Law and Policy and the Colorado Coalition for the Homeless*).
- Attorney representation significantly improves tenants' chances of remaining in their home.
- Attorneys can reduce the number of tenants receiving an eviction judgement or improve the terms of stipulated agreements, including money owed, even when they cannot keep tenants' in their current home, lowering barriers to finding their next housing.
- Eviction legal defense is an emerging best practice in cities across the country, including Los Angeles, New York, Philadelphia, Berkeley, Boston, Milwaukee and others.

### Purpose

- Reduce displacement and homelessness.
- Where families cannot remain in their homes, improve the terms of legal stipulations or judgments to minimize barriers in finding future housing.

### Pilot Timeline and Goals

- Launch estimated early second quarter of 2018.
- Funding estimated to last approximately 6-9 months, to serve approximately 200 people (some full representation, others with quick legal advice and/or referral).
- Pending positive results, advocate for city funding for continuation and expansion.

### Eligibility

- Denver residents.
- Full representation from Colorado Legal Services: household incomes below 200% of poverty. (Less than \$24,120 for single person - \$49,200 for a family of four).
- The pilot may be able to provide light advice/referral or representation through other providers to households up to 250% of poverty.

### Pilot Evaluation

- Who was served.
- Client outcomes.
- If possible, estimated return on investment based on other city expenditures avoided.

#### FOR MORE INFORMATION, CONTACT:

(720) 337-7712  
KNIECHATLARGE@DENVERGOV.ORG

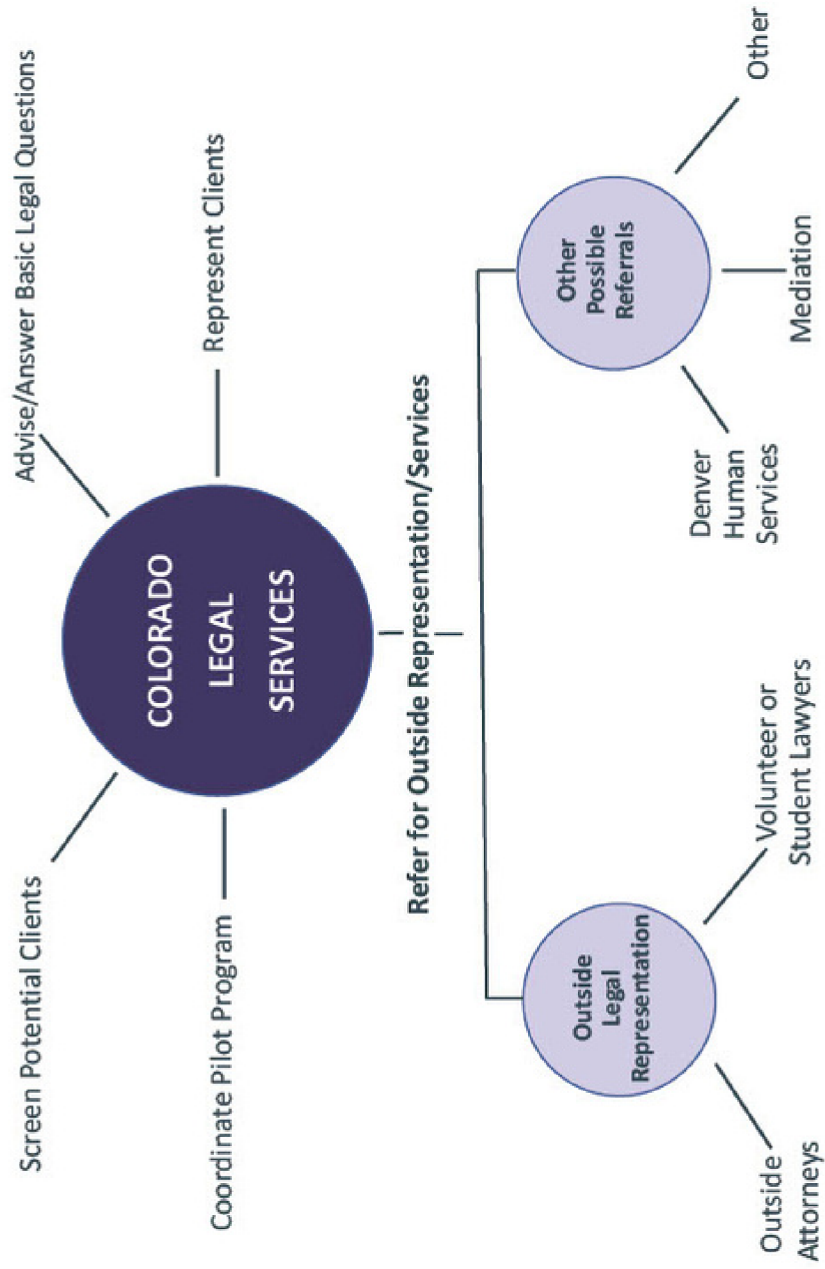
#### CONTRIBUTING COUNCIL OFFICES AND MEMBERS:

ROBIN KNIECH, PAUL KASHMANN, WAYNE NEW, KEVIN FLYNN,  
PAUL D. LÓPEZ, DEBORAH "DEBBIE" ORTEGA,  
ALBUS BROOKS, MARY BETH SUSMAN,  
STACIE GILMORE, KENDRA BLACK,  
RAFAEL G. ESPINOZA, JOLON CLARK AND  
CHRISTOPHER HERNDON



# APPENDIX E: DENVER EVICTION LEGAL DEFENSE PILOT

## DENVER EVICTION LEGAL DEFENSE PILOT MODEL





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