Appendix D

Assessment of Fair Housing

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D Assessment of Fair Housing

California Government Code Section 65583 (c)(5) requires cities to affirmatively further fair housing opportunities and promote housing throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by state and federal fair housing ad planning law. AB 686 (2019) defined "affirmatively further fair housing" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities, and other protected classes. Section 65583 (c)(10) (A) requires the Housing Element to include an assessment of fair housing which includes the following components:

- A summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity,
- An analysis of available data and knowledge to identify integration and segregation patterns, disparities in access to opportunities, and disproportionate needs, and displacement,
- An assessment of contributing factors, including local and regional historical origins and current policies and practices,
- Identification of fair housing goals and actions, giving highest priority to factors that limit or deny fair housing choice or access to opportunity; and
- Strategies and actions to implement priorities and goals.

CITY OVERVIEW

Turlock is in the San Joaquin Valley, comprised of Stanislaus, Merced, and Fresno counties, and is part of the Central Valley Region encompassing 19 counties from Redding to Bakersfield. The Valley is predominantly rural with a few more densely populated urban centers including Turlock, Modesto to the northwest and Merced to the southeast of Turlock. Turlock is the second-largest city in Stanislaus County with an estimated population of 71,924 as of this writing compared with 217,484 for Modesto.[1] The population in both cities has declined since the 2020 Census, a reduction of 1.06 percent in Turlock and 0.54 percent in Modesto. The U.S. Department of Housing & Urban Development (HUD) requires a regional analysis as a part of assessing fair housing to help identify fair housing issues in a broader context, which allows jurisdictions to address regional issues with scale-appropriate solutions. To that end, this assessment contextualizes its analysis of Turlock with an analysis of the county and the broader Central Valley regions' fair housing patterns and trends when applicable.

[1] World Population Review https://worldpopulationreview.com/us-cities/turlock-ca-population

PUBLIC OUTREACH

This assessment considers feedback from the public received during the development of the Regional Analysis of Impediments to Fair Housing Choice, Fiscal Year 2020-2025, prepared by Stanislaus County for the Stanislaus Urban County and the Cities of Turlock and Modesto in conjunction with the preparation of their HUD-mandated Consolidated Plan. The outreach process in Turlock included a meeting with the Turlock Community Collaborative on February 18, 2020, and a public hearing before the Turlock City Council on May 12, 2020. The Community Collaborative is a group of local nonprofit organizations, government agencies, businesses, and cities founded in 2002 to provide information and support to nonprofit agencies working in the community. The Collaborative's members include several organizations active in fair housing issues such as California Rural Legal Assistance, Community Housing and Shelter Services, Housing and Economic Rights Advocates, Project Sentinel, and the Stanislaus County Mediation Center.[2]

As required by HUD, the Turlock/Stanislaus County HOME Consortium consulted with organizations that address fair housing, civil rights, and the needs of persons with disabilities during preparation of the 2023 HOME-ARP Allocation Plan including Project Sentinel, California Rural Legal Assistance, Community Housing and Shelter Services, The Consortium held two facilitated virtual consultation sessions in December 2022 including one that focused on fair housing with the Disability Resources Agency for Independent Living and the LGBTQ Collaborative. The Consortium also reached out to other stakeholders at a meeting held by the Stanislaus Community System of Care governance body in January 2023 and encouraged all consultation session participants to complete an on-line survey. Participants included a variety of organizations serving persons experiencing homelessness and at risk of homelessness, persons fleeing or attempting to flee violence, and other populations at risk if housing instability.[3]

DATA/RESOURCES CONSULTED

Many of the data sources used to prepare Turlock's housing needs assessment (Appendix B) also provided information to support this evaluation of fair housing in the city. Primary data sources include AFFH Mapping and Data Resources provided by the State Department of Housing and Community Development (HCD), the 2020 United States Census, the 2016-2020 American Community Survey, the Stanislaus Urban County and City of Turlock Consortium Consolidated Plan, Fiscal Year 2020-2025, and the following:

- Taking Stock: A Comprehensive Housing Report for the San Joaquin Valley in 2022, Regional Early Action Planning (REAP), Data Profile
- City of Turlock 2015-2023 Housing Element
- Stanislaus County Regional Analysis of Impediments to Fair Housing Choice (AI)
- California Tax Credit Allocation Committee TCAC/HCD Opportunity Area Maps
- Home Mortgage Disclosure Act Data, 2007-2017
- American Communities Project: Diversity and Disparities, Brown University[4]

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[2] Turlock Community Collaborative, 2023 Member Directory, 2023.

[3] Turlock/Stanislaus County HOME Consortium, HOME-ARP Allocation Plan, submitted to HUD March 2023.

[4] Brown University, American Communities Project, 2022. Avaliable: https://www.brown.edu/academics/spatial-structures-in-social-sciences/diversity-and-disparities

- Urban Displacement Project, UC Berkeley[5]

D.1 Fair Housing Resources

Fair housing services are an essential component of proactive efforts to further fair housing. They help to ensure that a variety of housing options are accessible to State and federally protected groups, including those based on race, color, gender, religion, national origin, familial status, disability, age, marital status, ancestry, source of income, sexual orientation, genetic information, or other arbitrary factors. Fair housing services also help Turlock residents understand and protect their right to access housing. In addition to the HUD Office of Fair Housing and Equal Opportunity, California Department of Fair Employment and Housing (DFEH), and the California Department of Consumer Affairs, local agencies and organizations providing services to Turlock residents and those seeking housing in the community include:

- Community Housing and Shelter Services (CHHS)
- City of Turlock Housing Services
- California Rural Legal Assistance
- Project Sentinel and Stanislaus County Mediation Center
- Families de la Raza Unida de Turlock
- Stanislaus County Bar Association Lawyers Referral Service
- Stanislaus County Regional Housing Authority
- Stanislaus County Family Justice Center

FAIR HOUSING SERVICES, ENFORCEMENT AND OUTREACH CAPACITY

Fair housing enforcement and outreach capacity refers to the ability of a city and the fair housing agencies and organizations serving the community to provide information about fair housing rights and responsibilities to community members including residents and housing providers. Outreach capacity includes the ability address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. The US Department of Housing and Urban Development (HUD) has several programs that fund State and local agencies to conduct fair housing services and activities, including the Fair Housing Assistance Program (FHAP) and the Fair Housing Initiatives Program (FHIP). These groups communicate with housing providers, conduct investigations, perform testing to help determine if someone has experienced discrimination, and provide information and assistance. The FHAP funds the California Department of Fair Employment and Housing (DFEH) to enforce Federal fair housing laws in California. The closest FHIP to Turlock is Project Sentinel, a non-governmental organization (NGO) based in Modesto that HUD funds to provide education, outreach, and enforcement. Housing discrimination complaints can be filed directly with HUD, with the State Department of Fair Employment and Housing, or with Fair Project Sentinel.

Housing discrimination complaints are one method to evaluate the extent of fair housing issues in a community. Turlock contracts with Project Sentinel to provide fair housing and tenant-landlord counseling

[5] Chapple, K., & Thomas, T., and Zuk, M, 2021. Urban Displacement Project, Berkeley, CA: Urban Displacement Project.

services. Project Sentinel, a nonprofit organization offering a variety of fair housing resources and services in much of Northern California, is the primary organization providing individuals in Turlock and the rest of Stanislaus County with assistance for filing complaints about violations of fair housing law with state and national agencies. The organization also provides outreach and education to housing providers, property managers, and service providers, dispute resolution, and housing counseling. Resources are offered in English, Spanish, Vietnamese, and Chinese. Project Sentinel has an office in Modesto where Turlock residents can obtain assistance with housing problems such as discrimination, mortgage foreclosure and delinquency, rental issues including repairs, deposits, privacy, dispute resolution, home buyer education, post purchase education and reverse mortgages. The city also provides information about Project Sentinel's programs on a page at the Housing Programs website (https://www.cityofturlock.org/housingprograms/fairhousing/) with downloadable copies of some informational materials including materials produced by HUD and State agencies.

Annually, Project Sentinel processes over 10,000 initial contacts; handles over 400 housing discrimination complaints and over 1,700 landlord tenant and community dispute cases; counsels over 750 homeowners; and provides monthly workshops on housing topics to its service area. During Fiscal Year 2019-2020, Project Sentinel received 545 calls for fair housing information within the Stanislaus Urban County area resulting in a total of 12 fair housing cases and 32 tenant/landlord cases handled by the agency.

Additionally, California Rural Legal Assistance (CRLA) has 17 offices statewide including headquarters in Modesto. CRLA operates a state-wide Fair Housing and Foreclosure Prevention Program under guidance of HUD that assists victims of housing discrimination. They focus on the needs of farmworker communities, those living in unincorporated areas, and other underserved areas of California that have been subject to segregation and historic patterns of discriminatory housing and lending practices.

Turlock collaborates with the Stanislaus County, the city of Modesto, and the Stanislaus Regional Housing Authority that receive entitlement funding from HUD. One of the requirements for maintaining eligibility for federally funded programs such as the Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grant programs, and other state and local programs is to "actively further fair housing choice" through:

- Completion of an Analysis of Impediments to Fair Housing Choice (AI),
- Actions to eliminate identified impediments; and
- Maintenance of fair housing records

The 2024-2025 Annual Action Plan the City of Turlock submitted to HUD as the application for funding from the CDBG program and HOME Consortium funds, commits Turlock to funding organizations, including We Care Program, United Samaritans, Center for Human Services, Healthy Alternatives to Violent Environments (HAVEN) to provide supportive services to homeless and low-income populations, specifically to assist in fair housing education and counseling on housing discrimination.[6] For the 2024-2025 financial year, the City of Turlock committed to providing fair housing support services for 30 households with CDBG funds.

Fair housing complaints are not the only indication of fair housing conditions, but data from Stanislaus Regional Housing Authority, along with records published by the State Department of Fair Employment and Housing (DFEH), provide a basis for viewing Turlock in a broader context. The 2020-2025 Analysis of

[6] City of Turlock Annual Action Plan For CDBG funds & Turlock/Stanislaus Urban County HOME Consortium funds Fiscal Year 2024-2025. Available: https://www.cityofturlock.org/_pdf/hppr.asp?id=45

Impediments (AI) reports that between 2014 and 2019 complaints regarding housing in Turlock included 30 related to disability, five complaints related to race, and five related to familial status with fewer than five complaints filed in cases related to national origin, gender/sex, arbitrary reasons, and age. Relative to Stanislaus County, Modesto had a significant number of complaints (165) compared to other jurisdictions in the County. This may be because Project Sentinel has a physical office in Modesto but could also be due to the amount of outreach or advertising to the public in Modesto, partnerships with other organizations, or the number of fair housing violations occurring. The larger number may therefore reflect successful community outreach as opposed to a greater prevalence of housing discrimination.

The 2020 AI reported that as of 2016, though many people who speak a language other than English at home are bilingual, there are also residents who report speaking English "less than very well" in all parts of the County. More than 20 percent of residents in Waterford, Newman, Ceres, and the Unincorporated County report speaking English less than "very well". While Spanish is the predominant language of these residents, Turlock also has at least five percent of residents who speak another language and speak English less than "very well". Linguistically isolated households are located in areas of Turlock west of SR99, southwest of downtown, both west and south of CSU Stanislaus. Communication regarding fair housing issues and solutions to closing any findings should consider there might be language barrier.

FAIR HOUSING COMPLIANCE

California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) FEHA Regulations (California Code of Regulations (CCR), title 2, sections 12005-12271) Government Code section 65008 covers actions a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.

HCD guidance on Affirmatively Furthering Fair Housing requires an analysis of compliance with existing fair housing laws and regulations. Examples of State fair housing laws include the California Fair Employment and Housing Act ("FEHA," Gov. Code, Section 12900 – 12996) and FEHA Regulations (CCR, Section 12005 – 12271). Government Code section 65008 covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.

The City of Turlock complies with all applicable with State and Federal civil rights and fair housing laws, including but not limited to the following:

- California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with section 12900) of Division 3 of Title 2)
- California Government Code section 8899.50, which requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.
- Government Code section 11135 et seq., which requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the State, regardless of one's membership or perceived membership in a protected class.
- Density Bonus Law (Gov. Code, Section 65915.)

- Housing Accountability Act (Gov. Code, Section 65589.5.)
- No-Net-Loss Law (Gov. Code, Section 65863)
- Least Cost Zoning Law (Gov. Code, Section 65913.1)
- Excessive subdivision standards (Gov. Code, Section 65913.2.)
- Limits on growth controls (Gov. Code, Section 65302.8.)
- Housing Element Law (Gov. Code, Section 65583, esp. subds. (c)(5), (c)(10).)

FEHA Regulations; and Government Code sections 65008, 8899.50, and 11135 et seq. Starting in June 2023, the County will act as the administrative jurisdiction for funds that are available to support various services and activities, including housing related activities, that would benefit residents of urbanized areas. As mentioned above, Turlock, as a recipient of CDBG and HOME funds, is required to maintain Affirmatively Furthering Fair Housing (AFFH) certification and to demonstrate compliance through its Consolidated Plan and Annual Action Plans, which are submitted to HUD for approval prior to receipt of the CDBG and HOME funds. To the extent that funds are federal or State funds are directed to Turlock in the future, compliance will be demonstrated and maintained through that mechanism. From May 20th to May 24th, 2024, HUD conducted remote monitoring of the City's CDBG-CV program in order to assess the City's performance and compliance with applicable Federal program requirements. HUD's review of the City's program performance resulted in the identification of zero findings and zero concerns, as communicated in the FY2024 Monitoring Report. Additionally, the Federal Fiscal Year 2024 Turlock monitoring review provided an opportunity to address open findings from previous HUD monitoring reviews. The city provided its most recent responses to HUD open findings from prior years. All findings are now closed, and no further response is needed.

The City of Turlock complies with State Density Bonus Law (Gov. Code, Section 65915.), the Housing Accountability Act (Gov. Code, Section 65589.5.), and the No-Net-Loss Law (Gov. Code, Section 65863). Section 9-2-103 of the Turlock Zoning Ordinance includes a short summary of the purpose and requirements for affordable housing density bonuses with a cross-reference to the most current State requirements in California Government Code Section 65915. Turlock has not established any additional bonuses or incentives for affordable housing or childcare facilities, nor has the City enacted any local ordinances, such as rent control or rent freezes, inclusionary regulations, or eviction protection ordinances. Turlock has not denied any affordable housing project in its jurisdiction, and through this Housing Element, commits to implementing a plan to ensure adequate sites to accommodate its RHNA obligations during the planning period, and to comply with other legal requirements. In preparing this Housing Element, Turlock has reviewed its Zoning Code to identify regulations that create potential constraints to housing development some of which also interfere with efforts to further fair housing. The Action Plan in Chapter 4 of this Housing Element includes programs intended to reduce constraints to residential development that will also help Turlock further fair housing.

LENDING PRACTICES

Discrimination in lending practices can be a major contributor to fair housing issues in a community because it limits the ability of individuals to live in a location of their choosing. The Home Mortgage Disclosure Act (HMDA) requires financial institutions, including banks, savings associations, credit unions, and other lenders, to annually disclose mortgage data to the public. HMDA financial data by itself is insufficient to conclusively identify instances of discrimination in lending but analysis of HMDA data is useful for exploring discrepancies in lending outcomes and identifying areas of concern.

Based on 2018 HMDA data, the 2020-2025 Regional AI for Stanislaus Urban County and the Cities of Turlock and Modesto found that out of 16,00 loans originated in Stanislaus County, 2,327 loans (14.5 percent) originated in Turlock. In 2018, Turlock experienced the highest approval rate in Stanislaus County at 59.5 percent which is higher than the national approval rate of 53.4 percent. Countywide in 2018, White applicants were approved for loans at a rate of 63.8 percent, compared with Hispanic applicants at a rate of 59.7 percent, Black applicants at a rate of 57.1 percent, and Asian applicants at a rate of 55.4 percent. In Turlock in 2018, White applicants were approved for loans at a rate of 65.5 percent, Asian applicants at a rate of 59.5 percent, Hispanic applicants at a rate of 58.7 percent, and Black applicants at a rate of 55.0 percent. Compared to the County, White and Asian applicants were approved at a higher rate in Turlock, while Black and Hispanic applicants were approved at a lower rate. The data does not indicate the grounds for the denial, and it cannot be proven on the basis of this data that the denials were not justified on the basis of standard financial criteria; however, the trend suggests both a potential for bias within the financial system and a need for financial literacy training among non-Whites to help those groups better understand how to improve their credit scores.

Charts D-1 and D-2 provide an overview of lending patterns in Turlock when compared to the county and over time. Chart D-1 confirms the findings of the 2020-2025 AI showing that potentially discriminatory lending patterns have continued at the county level up until the year 2021. Turlock has similarly seen uneven lending patterns, and as of 2021 (the most recent year that data is available) Black applicants had the highest loan denial rates, followed by Hispanic or Latino applicants. Further, since 2018, White applicants in Turlock have consistently experienced lower than average loan denial rates. The wider variation in loan denial rates for American Indian or Alaska Native and Native Hawaiian or Other Pacific Islander applicants is due to the low number of applicants during the period who identified as such. Chart D-3 and Chart D-4 show that in 2021, the City had higher loan approval rates for both home improvement and home purchase loans than the Stanislaus County.

Based on the identified disparities of lending patterns for residents of color and a history of discriminatory lending practices, the 2020-2025 AI recommended further fair lending investigations/testing into the disparities identified through the HMDA data analysis. More generally, it recommended that jurisdictions like Turlock may prefer lending institutions with a Community Reinvestment Act (CRA) rating of "Outstanding" and may exclude those with a rating of "Needs to Improve" or "Substantial Noncompliance" according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). The AI also recommended Turlock and other jurisdictions to strengthen partnerships with lenders to discuss lenders' community reinvestment goals, including home mortgages, home improvement loans, and community development investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.

BROKERAGE SERVICES

Real estate brokers or salespersons whose business is in Turlock may belong to one of several associations but most likely the Central Valley Association of Realtors (CVAR). Like all associations, CVAR has a Multiple Listing Service (MLS)—Paragon MLS—and is part of the NORCAL MLS Alliance, an MLS data integration project across the seven leading MLSs in Northern California. CCAR is bound by the Code of Ethics and Standards of Practice of the National Association of Realtors (NAR), which explicitly states in Article 10 that members shall not discriminate against any person based on race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. In addition to adopting the ethics standards set by the NAR, the state branch promotes its own diversity and inclusion programs, such as the Latino Initiative Voices in Action program, which provide educational materials for members on homeownership opportunities and fraud prevention.

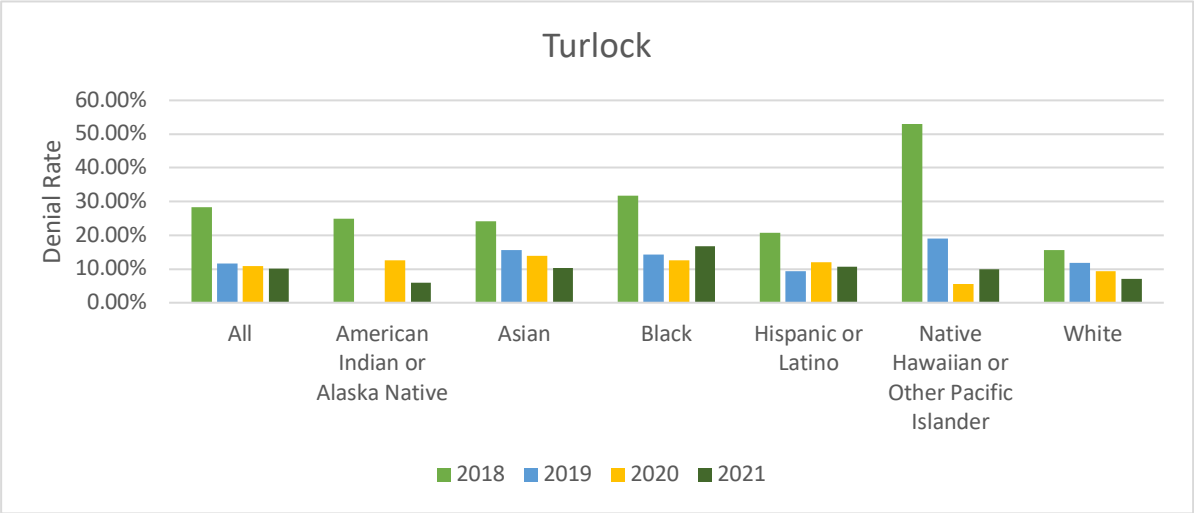
PROPERTY MANAGEMENT

Project Sentinel identified the largest rental companies in Stanislaus County as Liberty Property Management, Cornerstone Property Management, Matel Realtors, Marshall Perty, GreenGate Property Management, and Stanislaus Property Management. Half of these companies belong to California Apartment Association (CAA), the country's largest trade association for rental property owners and managers. However, there are a substantial number of owners who rent out units without going through a property management company, generally referred to as "mom and pop" landlords, or small, independent landlords. CAA reports that the majority of these small, independent landlords are not CAA members due to the time and cost to join, even though the actual benefits of joining may outweigh the costs when they run into issues. CAA also finds that most landlords who call the helpline are these small, independent owners. CAA encourages them to attend training and to utilize services as members.

CAA supports the spirit and intent of all local, State, and Federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. When signing up to become a member of the California Apartment Association, new members agree to abide by the following provisions of their Code of Ethics and Code of Equal Housing Opportunity. The Code of Equal Housing Opportunity reads as follows:

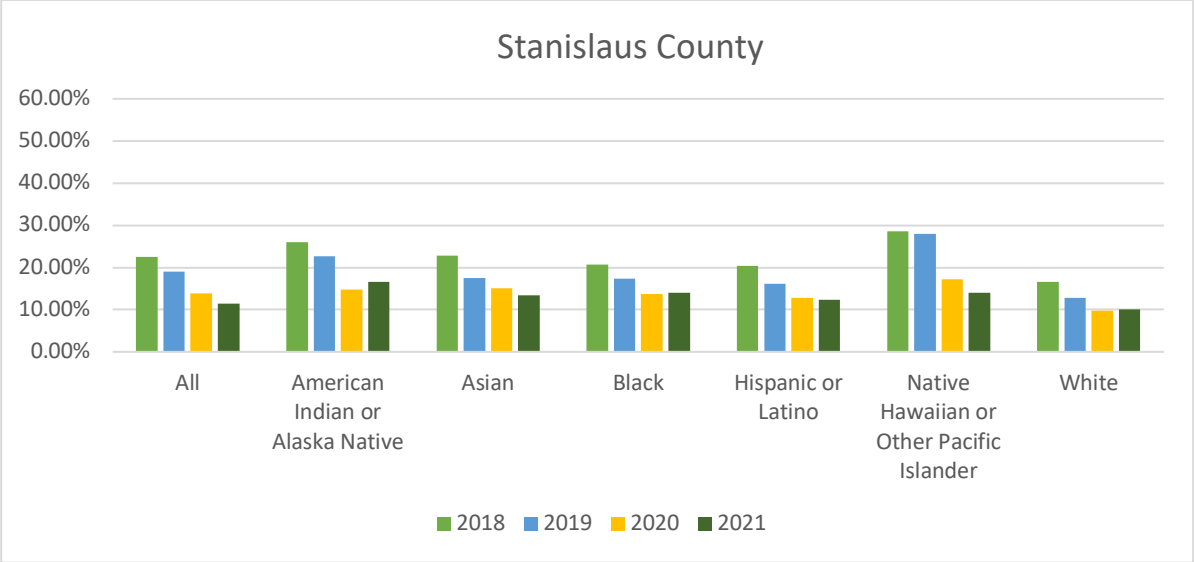
- We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;
- We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;
- We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and
- We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.

Chart D-1: HMDA Loan Denial Rates by Race/Ethnicity, Turlock



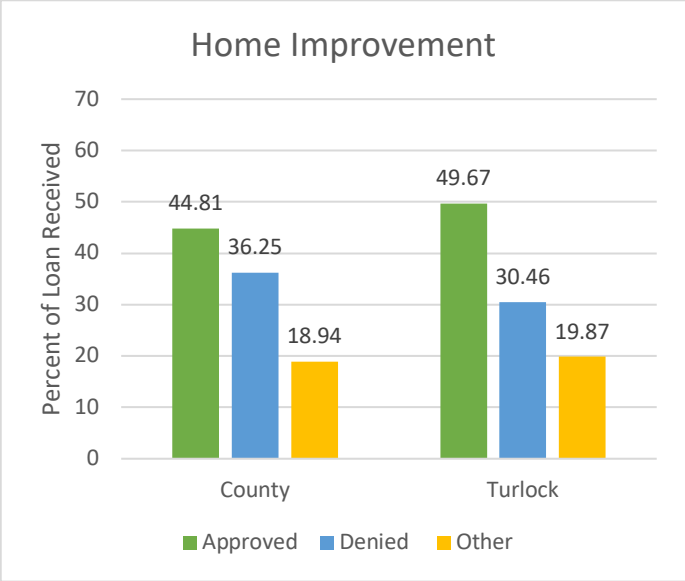
Source: Home Mortgage Disclosure Act Data, 2018-2021

Chart D-2: HMDA Loan Denial Rates by Race/Ethnicity, Stanislaus County



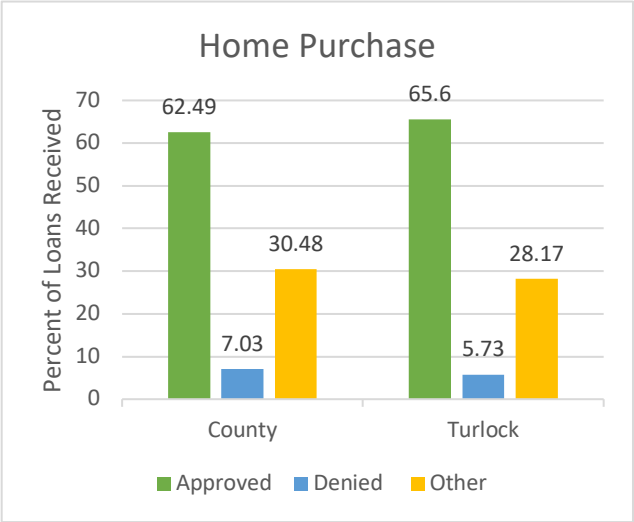
Source: Home Mortgage Disclosure Act Data, 2018-2021

Chart D-3: HMDA Home Improvement Loan Applications, 2021



Source: Home Mortgage Disclosure Act Data, 2021

Chart D-4: HMDA Home Purchase Loan Applications, 2021



Source: Home Mortgage Disclosure Act Data, 2021

CAA provides members with tenant screening services, application forms, and other types of landlord tenant forms, which if used by CAA members provide legal procedures for processing rental applications and resolving tenant issues. Further, should landlords stay within these guidelines, they will likely avoid committing housing violations. CAA offers a landlord helpline where landlords can call and speak to an attorney about their responsibilities. Lastly, all members receive a fair housing flyer to post on-site at their properties which states that it is illegal to discriminate based on the protected classes. When CAA receives complaints about potential fair housing violations, the association provides tenants with information on their rights and then refers them to the California Department of Fair Employment and Housing to file a claim. The Executive Director of CAA's Central Valley branch stated that her experience has been that most tenant complaints are about non-CAA members. The director said that these non-CAA members are independent landlords with little training and are unaware of the laws. For this reason, CAA makes additional efforts to reach these smaller operations throughout outreach events and the landlord helpline. Considering there is a large proportion of property owners who are not CAA members, Turlock and other Stanislaus County jurisdictions that contract with Project Sentinel can collaborate on outreach, education, and training to small, independent landlords about fair housing topics and regulations. Respondents to a Housing Element survey conducted by Stanislaus County identified landlord-tenant counseling and education/information on tenant rights as the two services needed most in their communities.[7]

Although recent declines in the population of Turlock and other Stanislaus County communities may relieve the shortage of affordable housing in the short-term, Stanislaus County and its communities are projected to grow over the next 40 years, which means that the shortage of affordable housing can be expected to continue. Landlords have little incentive to rent units to applicants with vouchers, disabilities, households with children, or other protected groups when they can find tenants able to afford to market rents. Programs that prioritize housing development for persons with disabilities, families with children, and those most at risk of homelessness, may be particularly effective.

[7] Stanislaus County Draft 2023-2031 Housing Element, 2023. Available: https://www.stancounty.com/planning/pl/pdf/draft-2023-2031-housing-element.pdf

D.2 Segregation and Integration

Patterns of segregation within a community can be a result of public or private actions, whether intentional or unintentional, that affect where different racial and ethnic groups and individuals in other protected classes live. Racial and ethnic characteristics are probably the most common and well-known basis for housing discrimination, but segregation may also be based on disability, familial status, and the level and source of household income. This section explores patterns and trends of segregation based on race and ethnicity, disability, familial status, and income level in the City of Turlock and the surrounding region. These groups are not mutually exclusive, and there may be considerable overlap across each protected class. Historically throughout the U.S., including in California and Stanislaus County, restrictive and exclusionary zoning practices have contributed to racial and economic segregation.

After the Civil War, John W. Mitchell, a wealthy land speculator, bought 100,000 acres where Turlock is now located, that were used for large herds of cattle and sheep as well as growing wheat. By the early part of the 20th century, Turlock had become the heart of a major agricultural area, which stands true today. Japanese immigrants from rural farming and fishing areas arrived in California to fill a labor shortage created by the 1882 Chinese Exclusion Act, which prohibited Chinese immigration to the U.S. California lawmakers soon passed racist ordinances targeting *issei* (first-generation) farmers: the California Alien Land Law of 1913 barred Asian immigrants from owning agricultural land or signing leases longer than three years. Newly arrived Japanese had few employment opportunities, but they were able to find jobs as agricultural workers. See Chart D-5 for a more detailed timeline of segregation's history in relation to fair housing practices.

Due to resentment toward Chinese and Japanese immigrants, especially from jobless White residents, many of whom had moved to California from the Dust Bowl, a series of severe dust storms swept across the mid-west states of Oklahoma, Arkansas, Kansas, and Texas during the 1930s, growers began recruiting Blacks from the south. Blacks continued to move to the area after Japanese residents were moved into internment camps. Turlock was the site of one of several temporary detention camps established during the first phase of the mass incarceration of 97,785 Californians of Japanese ancestry during World War II. The so-called Turlock Assembly Center was located at the Stanislaus County Fairgrounds from April 30 to Aug. 12, 1942.[8] At the height of its population, 3,692 people lived in barracks constructed on the fairgrounds.[9] The Stanislaus County Fairgrounds is now located in central Turlock, in Tract 38.04 where it and surrounding tracts are deemed racially integrated, as shown on Map D-1. Due to a boom in population attributed to the expansion of State Route 99 in the 1970s, Turlock grew west to meet the freeway's north-south path. This area is also where most of the city's low-medium segregation tracts are located, as well as the City's only High Segregation and Poverty tract (see discussion in Section D.3 and Map D-8 below).

During World War II, many Black and White agricultural workers moved to California's urban areas to fill jobs in the defense industry and other employment sectors. Additionally in this same timeframe the federal government initiated the Bracero program to attract workers from Mexico to help address a shortage of farmworkers. After the program ended in 1964, Mexican farmworkers continued to come to the Central Valley for agricultural work. Non-Hispanic Whites remain the largest racial group in Turlock and Stanislaus

[8] California Historical Landmarks in Stanislaus County, Temporary Detention Camps for Japanese Americans – Turlock Assembly Center. Available: https://noehill.com/stanislaus/cal0934.asp

[9] Turlock Journal, 2009 https://www.turlockjournal.com/news/local/turlock-japanese-american-assembly-center-to-be-memorialized/

County, but Hispanics are now the second largest ethnic group comprising about 48 percent of the countywide population.

In addition to these ethnic groups, the southern part of Turlock has been known historically as "Little Urmia" because of the immigration of Assyrians in the early 20th century. Early Assyrian settlers began to arrive in the United States during the last part of the 19th century and came mainly from northwestern Iran (Urmia region) as early as 1910 but the migration increased due to the genocide committed against them before, during and after World War I by the Turks, Kurds, and Moslem Persians. By 1915, when the total population of Turlock was about 1,500, there were ten Assyrian families living in Turlock. By 1921, the Assyrian community had grown to become known as "little Urmia." According to the 2020 US Census, 5.8 percent of Turlock residents reported that they had Assyrian ancestry, most located in southern Turlock in racially integrated Tract 37.

Historic segregation patterns in Turlock may be a factor that continues to affect the disparate characteristics of neighborhoods. Map D-1 shows neighborhood segregation in Turlock. The most racially integrated areas of Turlock today include Tract 38.04, where former internment camps were located, and Tract 37, where Assyrian settlers immigrated and settled. By contrast, Tract 39.05 in Turlock is classified as high White segregation, which can be traced back to the early immigration of White residents in central, east Turlock. Additionally, the most racially integrated areas of Turlock today are Census tracts designated by the State as Disadvantaged Communities (DACs), or low-income areas disproportionately affected by environmental pollution and other hazards that can lead to negative health effects.

RACIAL AND ETHNIC SEGREGATION PATTERNS

Turlock's racial and ethnic patterns of segregation need to be understood in the context of changing regional and local demographics. As shown in Table D-1, the population of Stanislaus County increased by 7.8 percent between 2010 and 2020, with a projected increase of about 15.3 percent between 2020 and 2040. Hispanic or Latino residents of any race are now the largest population followed by non-Hispanic White residents. The White population is expected to grow by 5.25 percent by 2040 compared with the Hispanic of any race population, which is projected to grow by 24.46 percent. Significant growth in the multiracial population is also expected (31.31 percent) followed by the Black population, which is expected to increase by 28.37 percent. This growth is probably due to the movement of Black households from the Bay area to San Joaquin and Stanislaus Counties in search of more affordable housing.

Despite the diversity of the County, the population is unevenly distributed geographically by race/ethnicity. In Turlock, Salida, and Modesto, between 36 to 49 percent of the population is non-Hispanic White. The three CCDs with the highest concentrations of non-Hispanic White people are Hughson, Oakdale, and Waterford, which are adjacent to each other in the eastern end of the county. Westport, Newman, and Patterson, adjacent to one another in the western part of the county, have the lowest non-Hispanic White population percentages. and are adjacent to each other on the western side of the county.

In the Turlock (including Ceres), Salida, and Modesto CCDs, in the center of the county, the White population ranges from 36.60 percent to 48.90 in the Turlock subdivision. In 2020, Stanislaus County had the highest percent of non-Hispanic White residents among the eight counties in the greater San Joaquin Valley region and Merced County, just south of Stanislaus County, had the lowest percent among the eight counties in the greater San Joaquin Valley region.

Table D-1: Population Growth by Race/Ethnicity, Stanislaus County, 2010-2040

	Population			Percent Change	
Race/Ethnicity	*2010*	*2020*	*2040 Forecast*	*2010-2020*	*2020-2040*
White (NH)	241,956	241,818	254,510	-0.1%	5.3%
Black (NH)	13,249	14,735	18,916	11.2%	28.4%
American Indian/Alaska Native (NH)	2,930	2,952	3,135	0.8%	6.2%
Asian (NH)	25,298	27,555	30,516	8.9%	10.8%
Native Hawaiian/Pacific Islander (NH)	3,215	3,297	3,329	2.6%	1.0%
Multiracial (NH)	12,932	14,939	19,617	15.5%	31.3%
Hispanic (any race)	217,003	250,659	311,974	15.5%	24.5%
Total	**516,583**	**555,955**	**641,997**	**7.8%**	**15.3%**

1. NH refers to non-Hispanic

Source: California Department of Finance, Table P-2D, County Population by Total Hispanic and Non-Hispanic Race (2010 -2060)

The State approved legislation in 2021 that requires counties to establish a program to redact racial covenants that barred Black, Chinese, Japanese and other racial or ethnic groups from owning or occupying homes in certain areas of the county. Although such restrictions have been illegal and unenforceable for more than half a century, they remain in many property documents as a review of covenants in Modesto showed. Government Code Section 12956.2 requires counties to identify and redact such covenants that remain in records. Stanislaus County is hiring a vendor to meet this requirement but, in the meantime, has published a form that allows property owners and other parties to undertake the process for individual properties.10, 11

PERSONS WITH DISABILITIES

Persons with disabilities may face discriminatory housing practices based on their disability, including the lack of accessible dwellings and refusal by housing providers to offer reasonable accommodations. Data shows that from a housing perspective, there are several different housing needs of disabled persons. For those disabled with a developmental or mental disability, one of the most significant problems is securing affordable housing that meets their specialized needs. Housing needs can range from institutional care facilities to facilities that support partial or full independence (such as group care homes). Supportive services such as daily living skills and employment assistance need to be integrated into the housing situation also. A disabled person with a mobility limitation requires housing that is physically accessible.

According to 2021 ACS five-year estimates, 7,576 persons (10.5 percent of the non-institutionalized population) in Turlock had a disability. This proportion is slightly lower than Stanislaus County (12.2 percent) and Modesto (13.7 percent). The most common disabilities in the city are ambulatory (28.0 percent of people with disabilities), independent living difficulty (21.6 percent) and hearing difficulty (12.4 percent).

[10] The Modesto Bee, 2023. Available: https://www.modbee.com/news/local/article273097685.html

[11] Stanislaus County Clerk-Recorder's Office Restrictive Covenant Modification Program Implementation Plan. Available: https://www.stancounty.com/clerkrecorder/pdf/restrictive-modification-program.pdf

As shown in Map D-2, the northern and eastern portions of the city fewer than ten percent of the population has disabilities while in the rest of Turlock, at least 10 to 20 percent of residents are disabled. There is one Turlock census tract, Tract 39.08 in the center of Turlock, in which persons with disabilities exceed 20 percent of the total tract's population, which is the threshold HCD typically uses as an indicator of overconcentration.

People with disabilities have many different housing needs, depending on their age, level of income, current tenure status, cultural background, and health status. People with disabilities may need assistance with personal and financial affairs, networks of care to provide services and daily assistance, and, possibly, architectural services to design features to allow those with disabilities to live independently. During the consultation process conducted as part of the HOME-ARP Allocation Plan, the Turlock/Stanislaus HOME Consortium in 2022, service providers reported that individual with disabilities may find affordable housing in smaller cities or rural areas, but these areas are frequently not accessible for a person's disability (e.g., wheelchair inaccessible) or are far from needed medical care, healthy food, or transportation.[12]

FAMILIAL STATUS

Familial status, and particularly discrimination against families with children, may be another basis for discriminatory housing practices. Such discrimination can limit the choices of where families can live and lead to geographic concentrations within a community. Statistically, female householders with children are more likely to be targets of discrimination than other families with households because of their lower income or source of income. Within Turlock, as indicated in Table D-2, most children under 18 years live in married-couple households. About 23 percent of children live in female-headed households with no spouse present compared with 10 percent of children live in male householder, no spouse present households. Female-headed households represented about 10.3 percent of owner-occupied households and 19.3 percent of renter-occupied households. Female householders are as common in Turlock as they are in Stanislaus County, as the County has 22 percent female-headed households and 68 percent married-couple households. In Modesto, the other urban center in the County, households with children under 18 are 24.9 percent female-headed households and 65.4 percent married-couple households.

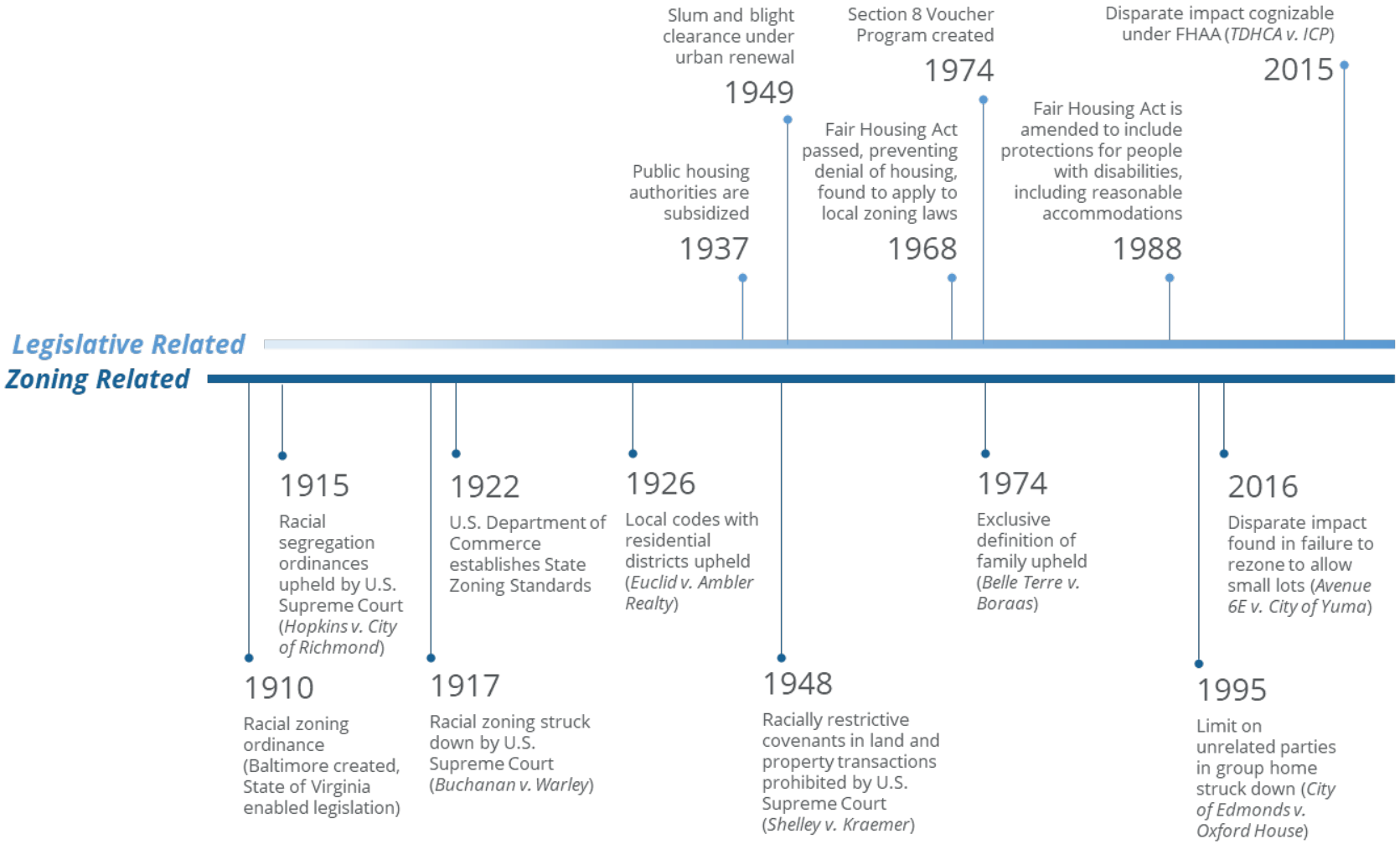
Table D-2: Children Under 18 Years in Turlock Households, 2022

Household type	*Number*	*Percent*
Married couple	12,588	66%
Male Householder, No Spouse Present	1,920	10%
Female Householder, No Spouse Present	4,353	23%
Total	18,978	100.0%

Source: U.S. Census Bureau, 2022 ACS Five-Year Estimates (Table S0901)

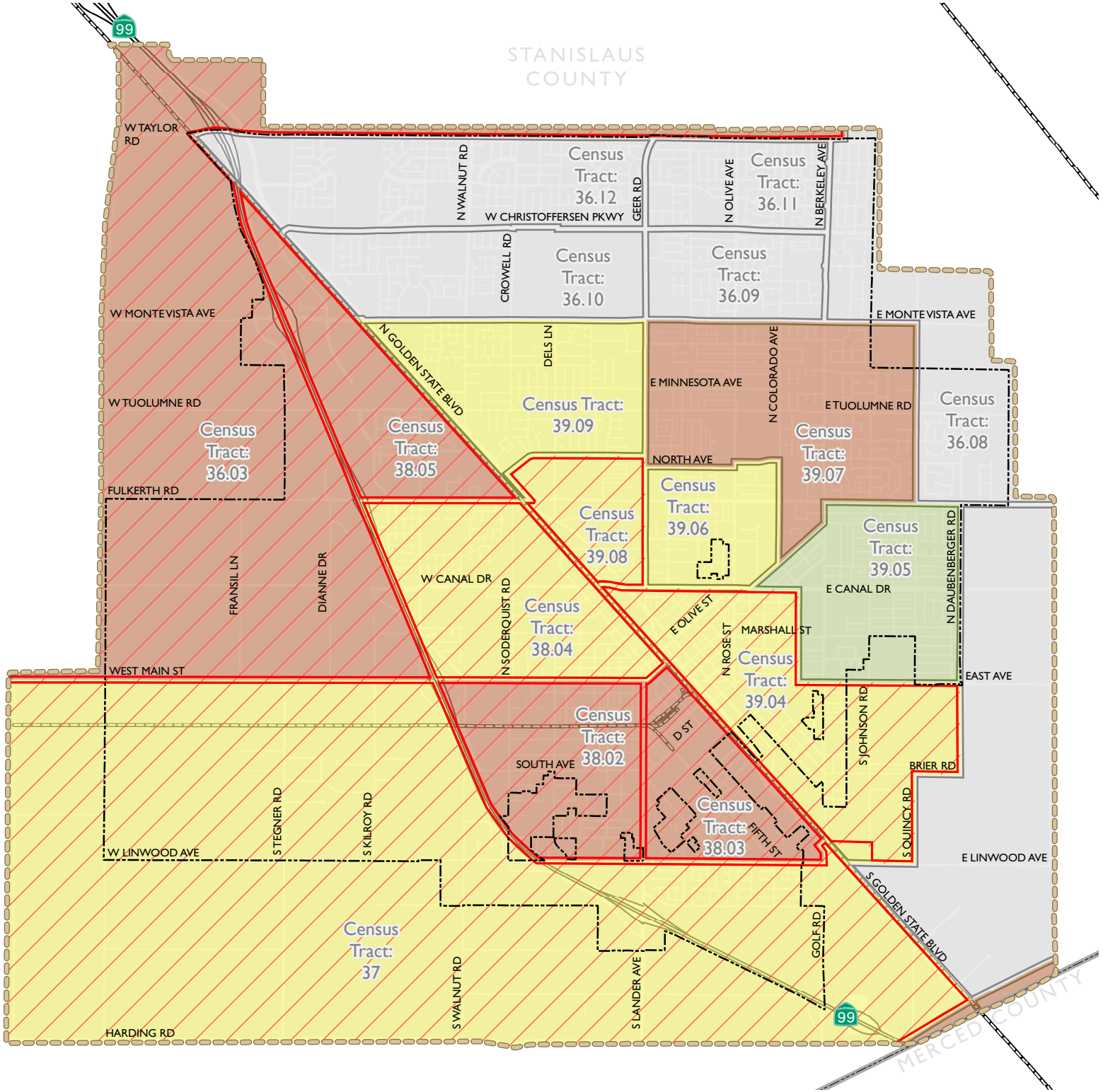
[12] Turlock/Stanislaus County HOME Consortium, pp. 9-10.

Chart D-5: Timeline of Segregation Policies in the United States



Map D-1

Turlock Neighborhood Segregation



- SB 535 Disadvantaged Community
- Racially Integrated
- Low-Medium Segregation
- High White Segregation
- No Data Applicable to 2021 Census Tract Boundary

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

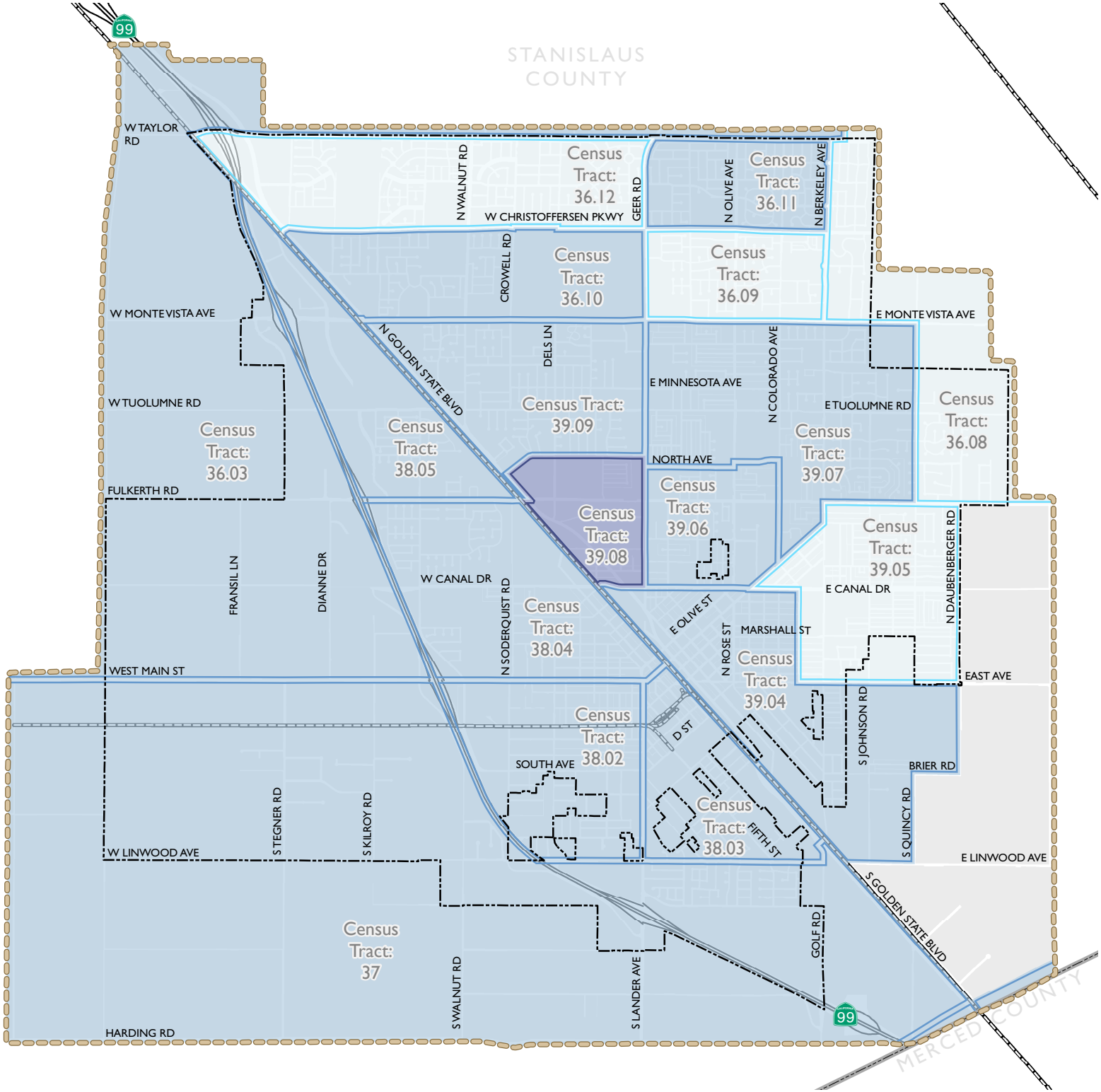
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: CalEPA, 2022; HCD, 2022; City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-2

Persons with Disabilities



Percent of Population with a Disability (ACS, 2017-2021) - Tract

- < 10%
- 10% - 20%
- 20% - 30%

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2022; American Community Survey (ACS) (2017-2021); City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-3 and Map D-4 show the percentage of children in each census tract that live in different types of family households and indicate there are some patterns of geographic concentration in Turlock based on familial status. For instance, Map D-3 shows a lower comparative share of children living in female-headed households outside of the city's center and a higher concentration of female-headed households living in census tracts north and west of downtown (where more than 20 percent of households are female-households), while Map D-4 shows 40-60 percent of households are married-couple households). In tracts more removed from the center of the city, particularly those in east Turlock, 80 to 100 percent of households are married-couple households while 20 percent or less of households are female-headed.

In Turlock, about 35.7 percent of female-headed households with children were under the poverty line, while only 13.1 percent of households without children were. This demonstrates that female-headed households with children are more likely to have greater housing needs and face difficulties in finding affordable housing due to their financial vulnerability. Affordable housing is not evenly distributed throughout Turlock and female-headed households are concentrated in lower resource areas. Greater access to affordable housing in areas outside the center of the city would aid in the integration of female-headed households. Outside of Turlock and Modesto, female-headed households are better integrated, but they are also less common, indicating that this may be a greater issue in the County's urban centers.

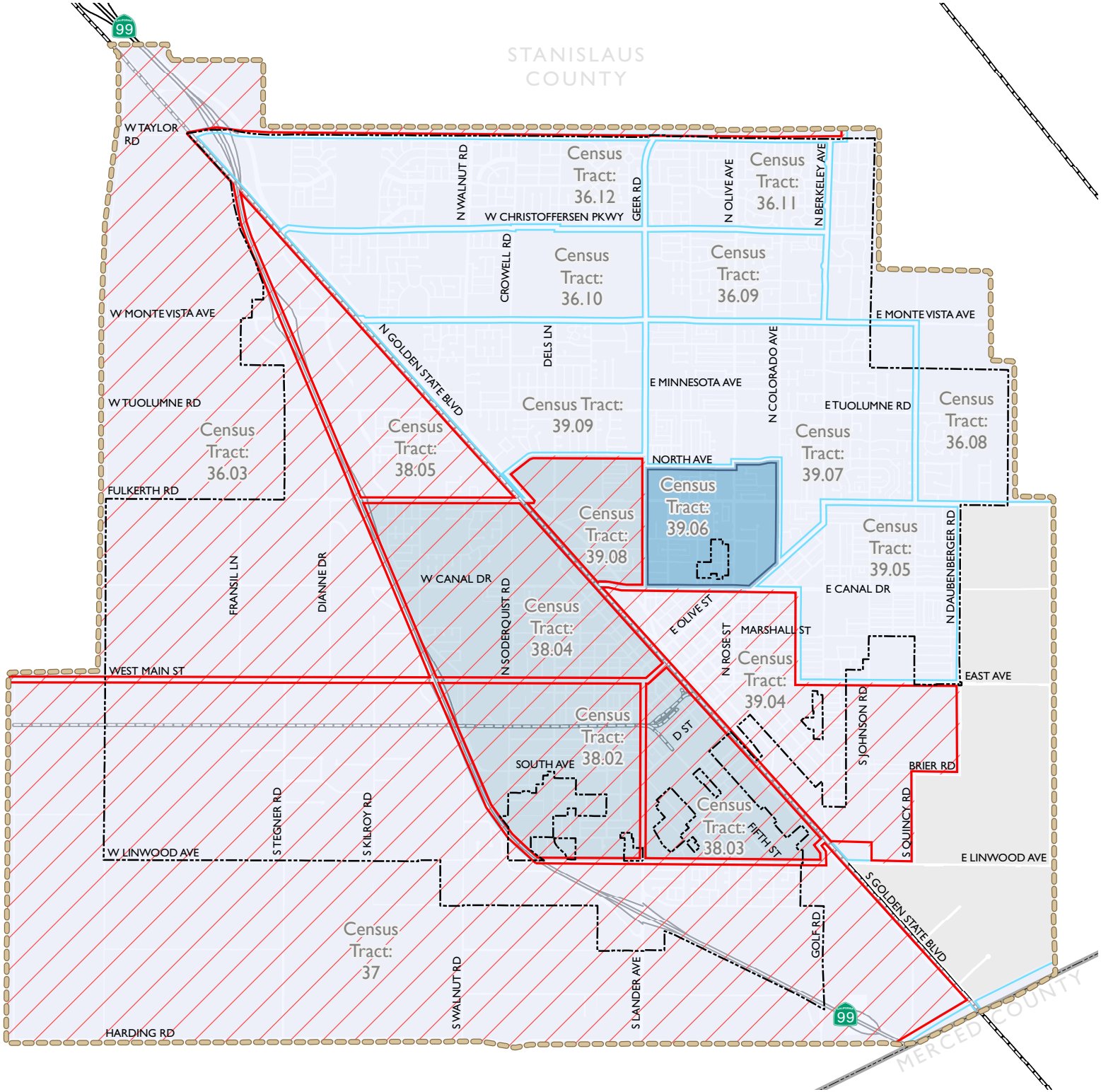
INCOME LEVEL

Geographic concentration by income, including concentration of poverty, is another type of segregation that may exist within a jurisdiction. The concentration of low- or moderate-income (LMI) individuals provides one method to gauge the extent of such segregation. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI – based on the HUD income definition of up to 80 percent area median income (AMI). Map D-5 provides the distribution of LMI block groups across Turlock; the central area of the City along South Golden State Boulevard, south of Fulkerth Road, and north of West Linwood Avenue is an LMI area, as well as the southeastern portions of the City, extending to the City limits and Merced County boundary.

Poverty rates and the concentration of poverty over time can provide an insight into the economic wellbeing of households and individuals in the region and in Turlock. As of 2020, both Turlock (15 percent) and Stanislaus County (13.5 percent) had a higher overall rate of poverty than the State (12.6 percent). Further, as shown on Table D-3, no race or ethnicity is significantly impacted more than another, as all races/ethnicities hover around 11 to 15 percent poverty rate. Overall, the rate of poverty for most ethnic groups is lower in Turlock than the County, though Hispanic/Latino and Two or More Races experience slightly higher rates of poverty. As shown in Map D-6, areas with higher percentage of poverty are located in central Turlock and west of Golden State Road, with one census Tract 39.08 exceeding 30 percent of population below poverty line. In 2020, between renter-occupied units and owner-occupied units, 19.6 percent of people below the poverty line owned where they lived, while 80.4 percent of people below the poverty line rented. Knowing which groups locally and regionally face the greatest economic challenges can inform targeted programs for financial literacy training and other fair housing programs.

Map D-3

Percent of Children in Female Headed Households



- SB 535 Disadvantaged Community
- Less than 20%
- 20% - 40%
- 40% - 60%

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

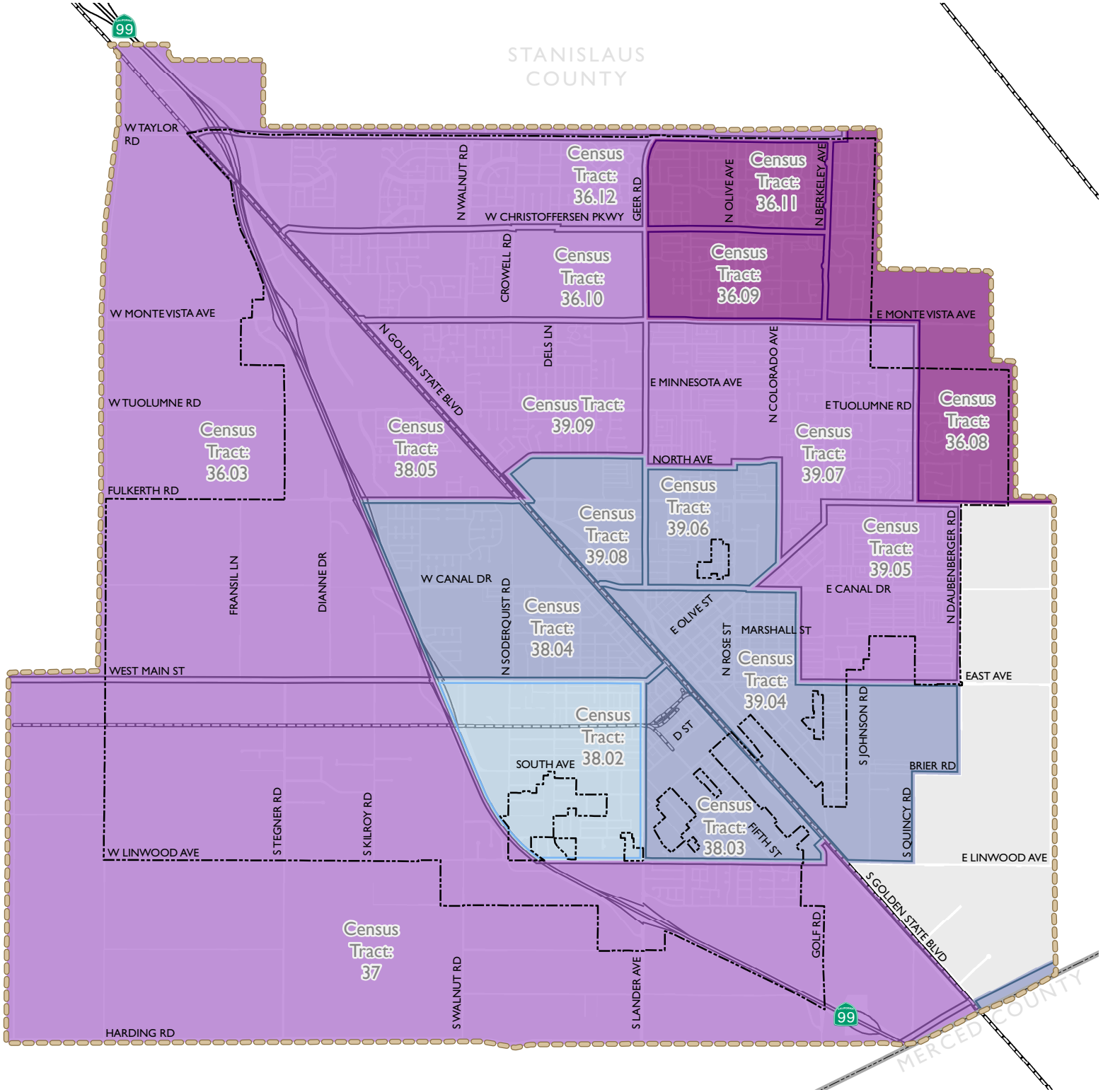
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: CalEPA, 2022; HCD, 2022; City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-4

Percent of Children in Married-Couple Households



20% - 40%
40% - 60%
60% - 80%
80% - 100%

Study Area Boundary
City Limit & County Island
County
Railroad

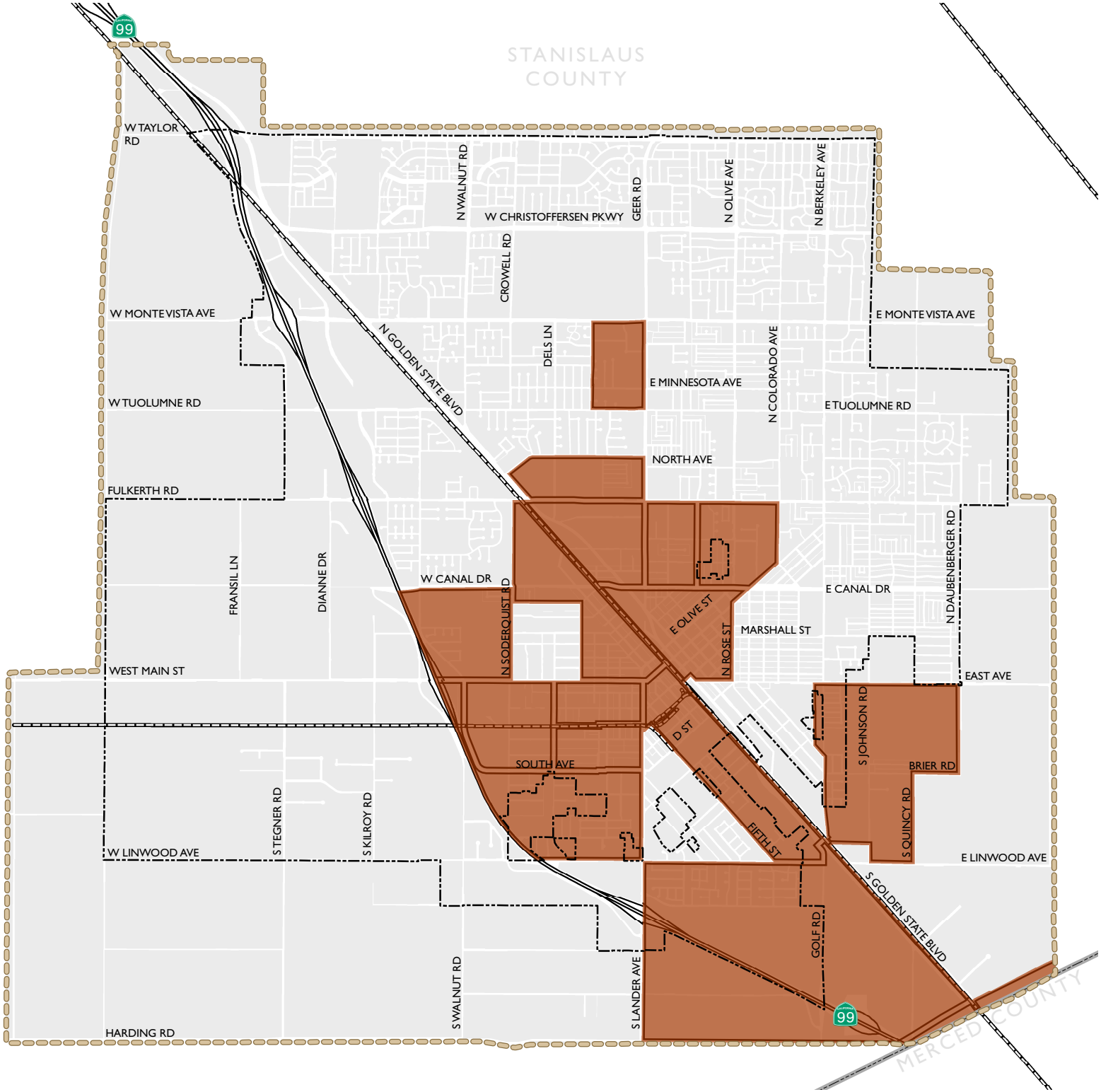
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2022;
City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-5

Low- to Moderate-Income Population, Block Group



Low to Moderate Income Population (HUD)

Block Groups with 51% or greater Low to Moderate Income Population

Study Area Boundary

City Limit & County Island

County

Railroad

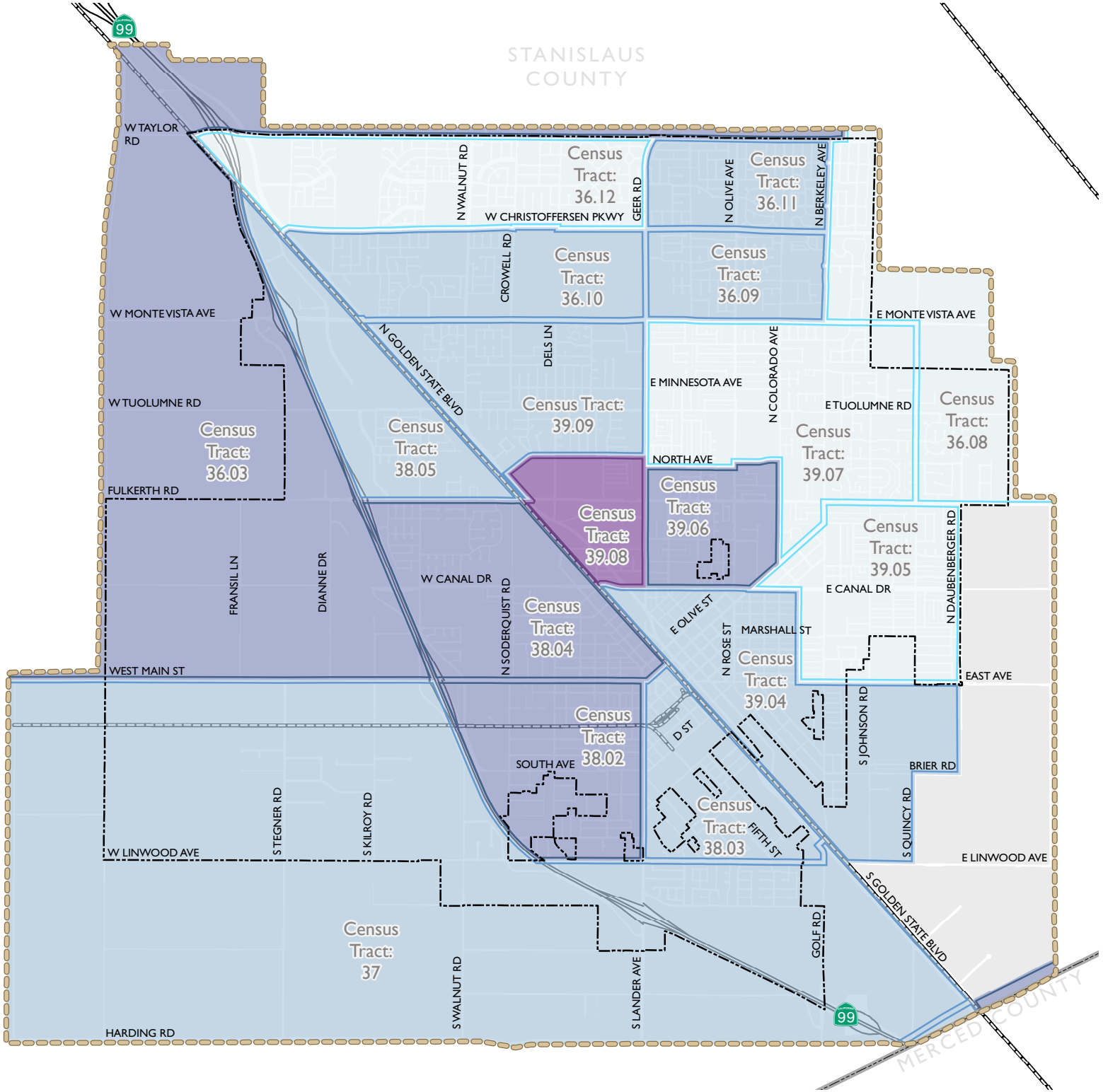
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HUD, 2020; City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-6

Poverty Status (2019), Turlock



Percent of Population whose income in the past 12 months is below poverty level (2017-2021)

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: American Community Survey (ACS) (2017-2021); City of Turlock, 2021; Dyett & Bhatia, 2024

Table D-3: Poverty Status in the Past 12 Months by Race/Ethnicity, 2020

Race/Ethnicity	*Turlock*	*County*	*State*
White alone, not Hispanic or Latino	11.3%	11.2%	8.8%
Black alone	15.5%	19.3%	19.6%
American Indian and Alaska Native alone	13.9%	17.2%	18.4%
Asian alone	14.6%	17.5%	10.0%
Native Hawaiian and Other Pacific Islander alone	8.4%	12.1%	12.2%
Some other race alone	12.8%	12.8%	17.3%
Two or more races	13.8%	11.6%	11.7%
Hispanic or Latino origin (of any race)	15.3%	11.6%	16.2%

Source: U.S. Census Bureau, 2020 ACS 5-year estimates subject table (S1701)

Income largely determines a household's ability to purchase or rent housing. While higher-income households have more discretionary income to spend on housing, lower- and moderate-income households are limited in the range of housing they can afford. In Turlock, most lower-income households (those making less than 80 percent of AMI) are renters, while the majority of households making above 80 percent of AMI are homeowners. Multi-family residential is heavily concentrated in tracts along North and South Golden State Boulevard, while tracts located in the northeast portion of the City are majority single-family homes. Considering the disproportionate racial/ethnic share of renters in Turlock (see Table B-27 in the Appendix B: Housing Needs Assessment) and that majority of the people below the poverty line are renters, neighborhood stabilization and homeownership strategies are pivotal in alleviating these patterns to further fair housing within Turlock. Further, expanding the areas where multifamily residential is permitted can also alleviate the concentration of poverty and low-income areas in Turlock.

HOUSING CHOICE VOUCHERS

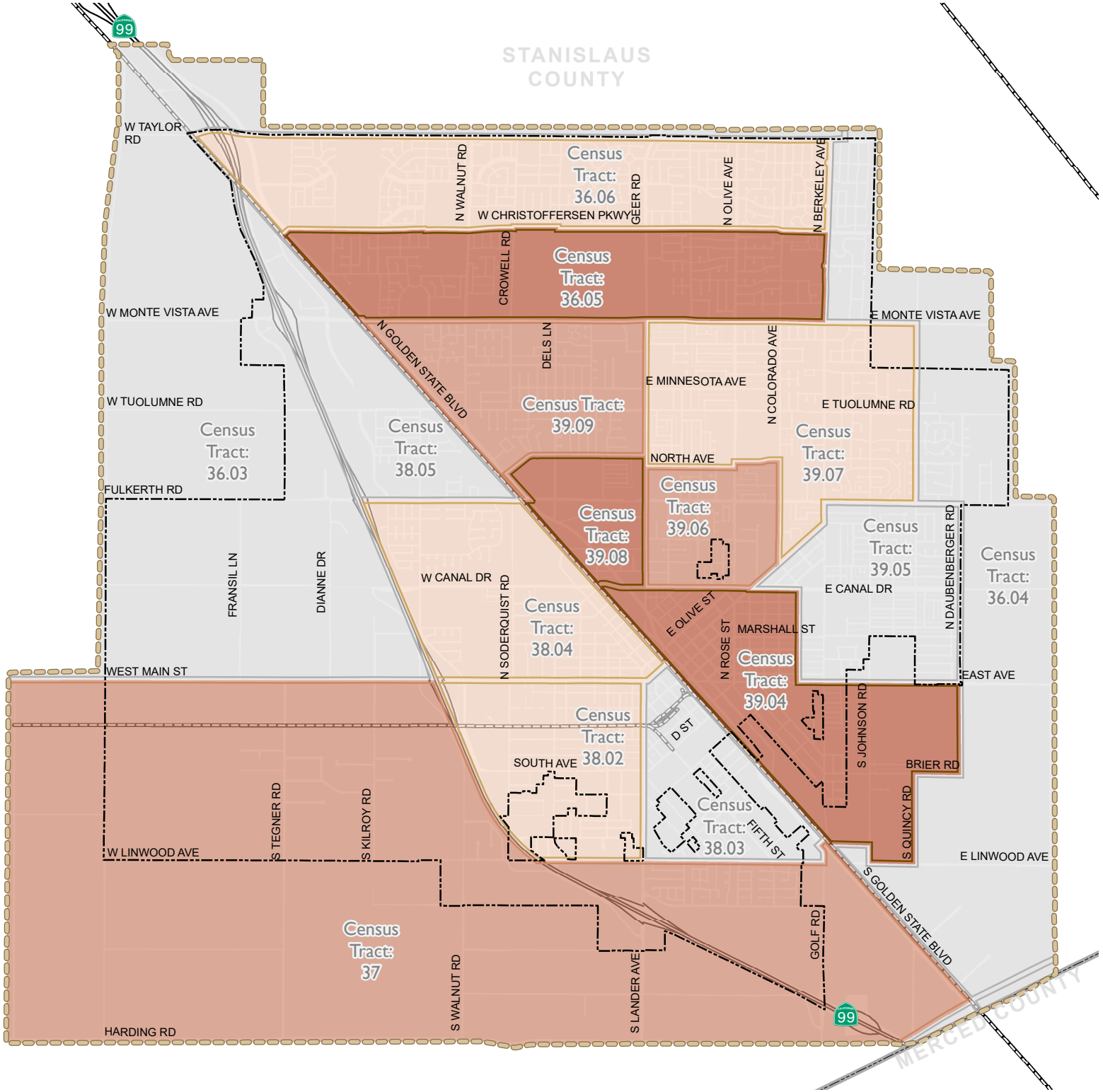
Housing Choice Vouchers (HCVs) allow very low-income families to choose and lease or purchase safe, decent, and affordable privately-owned housing, where the choice of housing is put in the hands of the individual family. In Turlock, as seen in Map D-7, there is a concentration of Housing Choice Vouchers relative to low to moderate income population along South Golden State Road in Downtown and Geer Road. In total, there are three tracts in Turlock where 15 to 30 percent of renter occupied units use the HCVs; two of the tracts (39.08 and 39.04) overlap with block groups with 51 percent or greater of the population with low to moderate incomes, but otherwise there is little overlap between the location of HCVs and areas with lower incomes. The tracts with over 15 percent of renter occupied housing units using HCVs are largely in areas determined by the Tax Credit Allocation Committee (TCAC) as Moderate Resource and High Resource; one tract, Tract 39.08, is located near Downtown within close proximity to shops, services, transit, and jobs. In Stanislaus County, Modesto is the other city with concentrations of HCV users, particularly in southwest and north Modesto.

During the consultation process the Turlock/Stanislaus HOME Consortium conducted in 2022, service providers reported that potential renters find the application process daunting. Moreover, because of the shortage of affordable rental housing in Turlock and the County as a whole, landlords are able to discriminate based on voucher usage, along with other factors including protected class status.[13]

[13] Turlock/Stanislaus County HOME Consortium, pp. 9-10.

Map D-7

Housing Choice Vouchers



HCV Public Percent

- 0.0%
- 0.1% - 5%
- 5% - 15%
- 15% - 30%

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2022; City of Turlock, 2021; Dyett & Bhatia, 2024

Subsidized and Income Restricted Housing

There are technically two housing authorities in Stanislaus County; the Stanislaus Regional Housing Authority (SHRA) administers the programs of Riverbank Housing Authority. The Stanislaus Regional Housing Authority (SRHA,) a nonprofit, public corporation, is committed to addressing the unmet housing needs of residents and communities in the county. The Authority is governed by a citizen's commission appointed by the County Board of Supervisors. In addition to the HUD subsidized units, Low-Income Housing Tax Credits (LIHTC), general funds, and state housing funds are also used to develop affordable units; however, Stanislaus County's recent housing production using LIHTC, is low compared to the rest of the state.

Together, SHRA and Riverbank Housing Authority provide access to 6,335 subsidized housing units that include 736 public housing units, 1,060 project-based Section 8 units, and 4,460 housing choice vouchers (as of when the Stanislaus County 2020-2025 AI was published). Since 2008, HUD has recognized SHRA as "high performing" because it scores a cumulative 90 out of 100 points for a variety of inspection points (physical condition, financial condition, and management). A challenge many housing authorities face, SHRA has long waiting lists for its units with a waiting time of ten years for public housing and only occasional openings for housing choice voucher applications.

Between 2016-2018, only 55 low-income housing units were created in the County compared to 18,803 in the rest of the State. Modesto's HUD-funded affordable housing stock comprised more than 70 percent of the affordable housing in the County. As of 2018, 4.6 percent of Turlock's housing stock qualified as affordable units (1,202 units or 19.1 percent of all affordable units in the County).[14] As of 2018, Stanislaus County had 6,302 affordable units (3.5 percent of housing stock). In summary, Turlock and Modesto are where subsidized housing is concentrated within the County, with an even greater concentration existing within Modesto.

There are subsidized housing options located throughout Turlock that are income restricted and accept HCVs:

- **Cherry Tree Village.** Cherry Tree Village is an income restricted apartment complex with 104 units, located in the northern part of Turlock.
- **Denair Manor.** Denair Manor is a senior restricted complex with income restrictions located in central Turlock.
- **Avena Bella Apartments.** Avena Bella Phase 1 introduced 28 income restricted units, while Phase 2 provides 61 income restricted units. Avena Bella is located on the southern edge of Turlock.
- **Lake Park Apartments/Villas as Parkside.** Lake Park has 103 income restricted units in central Turlock.
- **Parkwood Apartments.** Parkwood has 178 income restricted units and is located the northern part of Turlock.
- **Crane Terrace Apartments.** Crane Terrace is a senior restricted complex with 44 income restricted units, located in the western part of Turlock.

[14] 2018 HUD Picture of Subsidized Housing data; DP04, Selected Housing Characteristics, ACS 5-year estimates (2013- 2017)

D.3 Racially/Ethnically Concentrated Areas of Poverty and Affluence

HUD defines racially or ethnically concentrated areas of poverty (R/ECAPs) as census tracts where 50 percent or more of the population is non-White and more than 40 percent of the households have incomes below the poverty line or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. There are five R/ECAPs in the central part of Stanislaus County, where Turlock, Modesto, and Ceres, the three most populous cities in the county are located. None of these R/ECAPS are in Turlock but one census tract (Tract 38.02) in Turlock does meet the Tax Credit Allocation Committee/HCD criteria as a High Segregation and Poverty (HSP) tract (Map D-8). The California Tax Credit Allocation Committee and HCD (TCAC/HCD) established a Fair Housing Task Force that created an alternate set of criteria that it considered more appropriate for evaluating access to opportunity than the HUD R/ECAP criteria. Because using absolute thresholds could result in comparisons among very different areas of the state (e.g. rural farming communities and dense, urbanized neighborhoods in coastal cities), the TCAC/HCD approach scores census tracts relative to other tracts in the same region. The methodology filters areas meeting standards for both racial segregation (overrepresentation of people of color relative to the entire county) and poverty (30 percent of the population living below the poverty line) and rates them according to scores based on nine economic, educational and environmental indicators. The higher composite scores mean more access to resources that offer residents a better chance at economic advancement, positive educational outcomes, and better physical and mental health.[15]

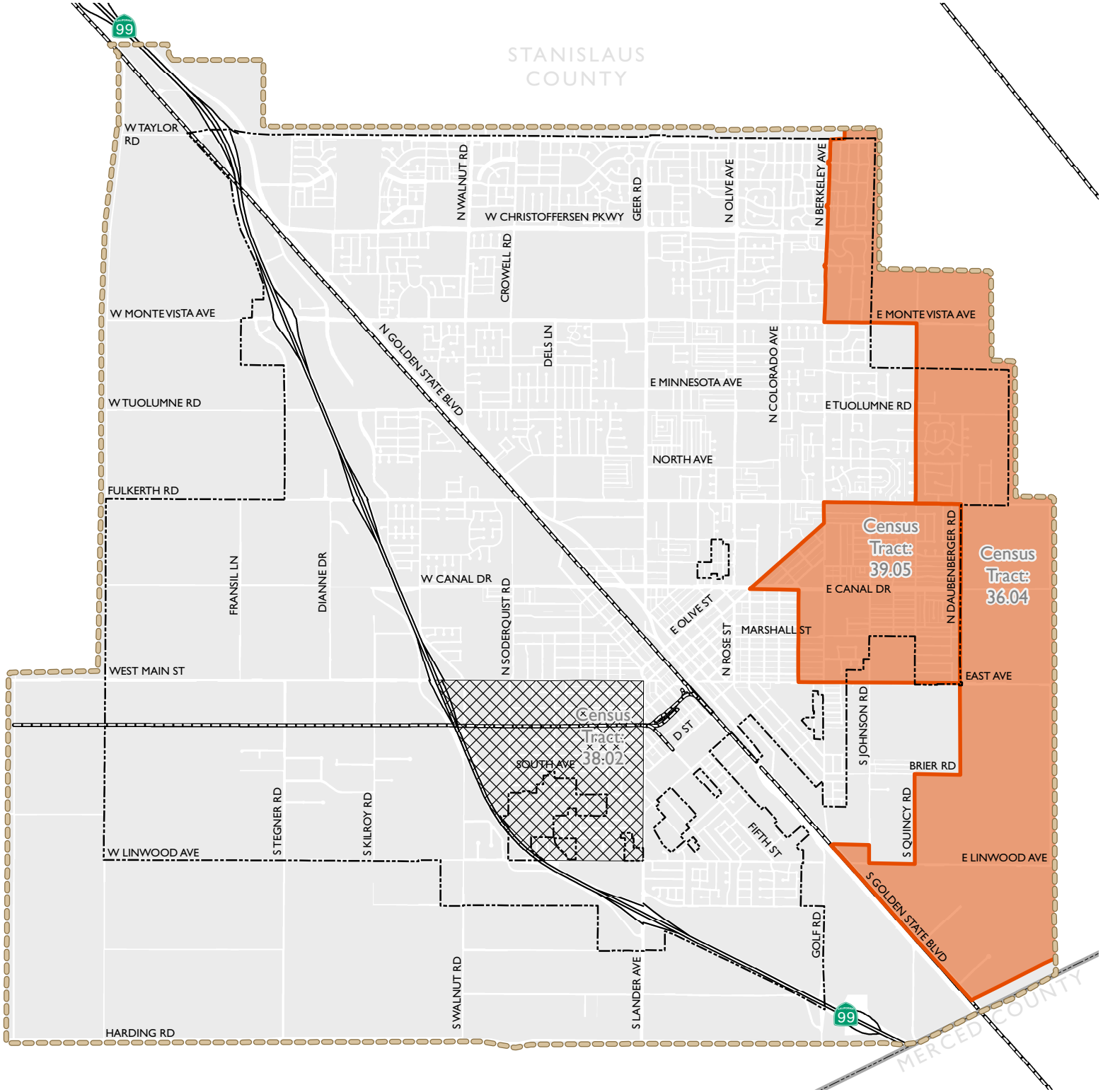
As discussed above, Turlock has only one census tract that meets the criteria for designation as High Segregation and Poverty compared with four in Modesto and one in Ceres. In Turlock, Tract 38.02 - the High Segregation and Poverty tract is bordered on the west by SR-99, intersected by the railroad, and includes three unincorporated county islands. Tract 38.03, to the east, also has three county islands and is identified as a Low Resource area using the TCAC/HCD criteria. The population of these two tracts and Tract 38.04 is predominantly Hispanic, ranging from 51.4 to 73.1 percent Hispanic. Since 1990, Tract 38.02 has seen an increase in Hispanic or Latino residents and a decrease in non-Hispanic White residents that reflects Turlock's overall demographic changes (Table D-4).

From 2010 to 2020, the percentage of households living below the poverty line increased more in Tract 38.02 than it did citywide (1.8 in the HSP tract compared 0.5 citywide). As of 2020, the average income in the HSP census tract was $41,580 while in Turlock it was $78,930, almost 90 percent higher. Residents of the HSP census tract are more likely to be renters than elsewhere in Turlock. Although the proportion of renter-occupied housing in Turlock only increased by 2.1 percent between 2000 and 2010, the percentage of renter occupied housing in the HSP census tract increased 12.9 percent, with 70.2 percent of the HSP residents in renter occupied housing in 2020. Due to the proximity to SR-99 and various railroad tracks, Tract 38.02 is heavily exposed to pollution burden, as displayed by the low Economic Score on Map D-11. However, there are various completed and planned capital improvement projects for this area of Turlock, namely multiple road rehabilitation projects and reconstruction of the Colombia Park swimming pool that improve the quality of life of residents.

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

Map D-8

Segregation and Income



Racially Concentrated Areas of Affluence (RCAA)

High Segregation & Poverty

Study Area Boundary

City Limit & County Island

County

Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2021 & 2023;
City of Turlock, 2021; Dyett & Bhatia, 2024

This area is mostly zoned as high density residential within City limits, with some low-density residential housing located sparingly throughout the county island. Within the county island, low density residential development is the predominant land use, with a significant number of vacant and or underutilized parcels. In this area, the development of the Workforce Hosing Overlay would allow housing development at up to 35 du/ac on major corridors like Lander Avenue. Turlock planned for the development and financing of this area by relying on the subdivision process and creating the Montana-West Master Plan Area.

Stanislaus County is working to address infrastructure needs within unincorporated developed neighborhoods of the County, including County Islands in the Turlock sphere of influence. In recent years the County has tried to guide infrastructure improvements and support the annexation of unincorporated pocket areas to surrounding cities. This includes prioritizing residential neighborhoods with public health and safety needs with installation of sewer mainlines, and potable water systems. In May 2021, the Board of Supervisors approved its priorities for use of $107 million in American Rescue Plan Act of 2021 (ARPA) funding allocated to Stanislaus County. To date of the $107 million, $55.8 million has been assigned to Community Infrastructure – Urban Pockets/County Communities. ARPA funds provide a unique opportunity for Stanislaus County to make substantial progress strategically on the infrastructure needs in its urban pockets and County communities.

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF AFFLUENCE

HCD provides a standard definition for Racially/Ethnically Concentrated Areas of Affluence (RCAAs) as a "census tract where 1) 80 percent or more of the population is White, and 2) the median household income is $125,000 or greater (slightly more than double the national median household income in 2016)."[16] The Stanislaus Council of Governments and some other Councils of Governments (COGs) use a more flexible definition, which is an area where the percentage of non-Hispanic White residents is more than 1.25 times the average in the COG region and the median income is at least 1.5 times higher than the COG AMI.

Map D-8 shows the locations of RCAAs under this definition; within Turlock, two RCAAs are located along the very eastern edge of the city and one RCAA located outside the city to the east. The RCAA tract in Turlock is 71.6 percent White (Hispanic or Latino), has a median income of $92,500, has 79.6 percent of units occupied by owners, and 98.2 percent of homes are single family dwellings (the highest percent in all Turlock tracts). To the east of Turlock, in the unincorporated community of Denair, the population is 64.6 percent White (Hispanic or Latino and non-Hispanic or Latino), with a median income of $93,060, has 100 percent of units occupied by owners, and 94.1 percent of homes are single family dwellings. Also within the region, are several census tracts identified as RCAAs surrounding the city of Oakdale, northeast of Turlock, which is in the Modesto MSA.

The existing concentrations of poverty and affluence may have been created and sustained by zoning practices in Turlock. Table D-4 shows the percentage of multi-family housing in the HSP tract opposed to the highest resource tracts (Map D-8). Compared with Turlock's overall percentage of structures with single units and the percentage within the census tract identified as High Segregation and Poverty, the highest and higher resource tracts have a greater percentage of single unit structures than multi-unit structures. Notably, only 3.3 percent of structures within the RCAA tract have two or more units while the percentage of structures in all of Turlock, while structures with two or more units is at 26.5 percent. By contrast, it is noteworthy that while the proportion of renter-occupied housing in Turlock increased by only 2.1 percent between 2000 and 2010, the percentage of renter occupied housing in the HSP census tract increased 12.9

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

percent, with 70.2 percent of the HSP residents in renter occupied housing in 2020. Proposed revisions to zoning regulations including the development of Congregational Overlay and incentives for deed restricting accessory dwelling units (ADUs) that increase opportunities for developing multi-unit and more affordable housing in the higher resource areas in the northern part of the city could lead to a more even distribution of population by income level.

Table D-4: Units In Structures by TCAC and Census Tract, 2020

TCAC Designation	*Tract*	*1 Unit*	*Percentage of 1 Unit*	*2+ Units*	*Percentage of 2+ Units*
Highest Resource	36.05	4,716	80.9%	1,115	19.1%
Highest Resource	39.09	2,003	80.1%	499	19.9%
Higher Resource	36.06	3,192	84.7%	575	15.3%
Higher Resource (RCAA)	39.05	1,513	96.7%	52	3.3%
Higher Resource	39.07	2,375	82.4%	509	17.6%
High Segregation & Poverty (R/ECAP)	38.02	1,316	75.2%	433	24.8%
City of Turlock	**All**	**18,664**	**73.5%**	**6,724**	**26.5%**

Source: U.S. Census Bureau, Census 2020 ACS Five-Year Estimates (Table A10032)

D.4 Disparities in Access to Opportunity

The CTAC-HCD Task Force Opportunity Maps identify the census tracts with the highest and lowest resources within each region of California, which can be used to analyze disparities in access to opportunities in three categories (domains)--economic, environmental, and education. The maps use specific indicators in each domain to determine a score for each census tract. The highest resource tracts are the top 20 percent of census tracts with the highest index scores relative to the region and high resource tracts are the next 20 percent. The remaining tracts are then evenly divided into the low resource and moderate resource categories. Opportunity maps for each of three domains show how census tracts within each city, county, or region compare with one another. Table D-5 lists the indicators the State used to create the composite scores for each domain, which are further aggregated to create a composite index that determines each tract's resource level.

A neighborhood's score for each economic and educational indicator is determined by whether it falls above or below the median (50th percentile) tract or block group value within the city. Each indicator that falls above the median adds one point to the final score. Additional information about each of the nine indicators and their data sources is provided in the California Fair Housing Task Force, Methodology for Opportunity and High-Poverty & Segregated Area Mapping Tools, January 2024. The Methodology also provides the rationale for and research underlying each of the indicators used to create the composite scores.

Table D-5: Opportunity Indicators and Measures for HCD/TCAC Opportunity Maps

Indicators	*Measure*
Economic	
Above 200 % Poverty	Percent of population above 200 % of Federal poverty line
Adult Education	Percent of adults with bachelor's degree or above
Employment	Percent of adults aged 20-64 employed in the civilian labor force or in armed forces
Median Home Value	Value of owner-occupied units
Environmental Burden	CalEnviroScreen 4.0 site-based pollution indicators
Education	
Math Proficiency	Percent of 4th graders who meet or exceed math proficiency standards
Reading Proficiency	Percent of 4th graders who meet or exceed literacy standards
High School Graduation Rates	Percent of high school cohort that graduated on time
Student Poverty Rate	Percent of students not receiving free or reduced-price lunch

Source: California Fair Housing Task Force, Methodology for Opportunity and High-Poverty & Segregated Area Mapping Tools, January 2024

REGIONAL CONTEXT

HUD has developed a mapping tool that cities can use to identify disparities in access to opportunity within a region. The tool uses census data to generate indicators for scoring census tracts. The higher the index score, the better an area's access to opportunity. The following indicators are scored on a scale from zero to 100.

- Low Poverty — A measure of the degree of poverty in a neighborhood, at the Census tract level.
- School Proficiency — School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high- and low-performing elementary schools.
- Labor Market — Measure the relative intensity of labor market engagement and human capital in a neighborhood based on employment levels, labor force participation, and education attainment.
- Low Transportation Cost — Estimates of transportation costs for a three-person, single-parent family with income at 50 percent of the median income for renters for the region.
- Transit — Estimates of transportation trips taken by a three-person, single-parent family with income at 50 percent of the median income for renters for the region.
- Jobs Proximity — Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region or other statistical area. Larger employment centers, like Turlock and Modesto in Stanislaus County, are more heavily weighted.
- Environmental Health — Summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index, the lower the exposure to toxins.

The Stanislaus County Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice (AI) explores the distribution of five of these types of opportunity: transportation, education, employment, transportation, access to low poverty neighborhoods, and access to environmentally healthy neighborhoods.

Chart D-6 and Chart D-7 below shows index scores based on the July 2020 HUD data release. In the Stanislaus County region and in Turlock, access to opportunity is generally highest for non-Hispanic Asian and Pacific Islander residents. Residents who identify as Hispanic or non-Hispanic Native American, on the other hand, have the lowest access to opportunity while non-Hispanic White as well as non-Hispanic Black people live in a wider variety of neighborhoods. The major exception to this is the relatively high labor market index scores of non-Hispanic Black, Hispanic, and non-Hispanic Asian and Pacific Islander residents in Turlock outside the Modesto region. Similar patterns are evident for the total population and those that live below the poverty line, as shown in Chart D-7.

CONTEXT

According to the TCAC Opportunity Areas composite score as shown on Map D-9, there is high variation in resource categories in the City of Turlock, as areas identified as Highest, High, Moderate and Low Resource are located throughout Turlock. The Highest Resource areas in the city are in the northern part of the city, generally north of West Christoffersen Parkway and east of Geer Road, while Moderate Resource tracts are west of SR-99 and in the east, and the Low Resource areas in the center of Turlock east of SR-99, as well as southeast by the Merced County boundary. Modesto, the largest city in the region, has a similar distribution of opportunity areas, though includes more tracts that meet the definition of High Poverty and Segregated, while smaller cities including Patterson and Riverbank are more homogeneous with a more limited range of classifications, usually Low and Moderate Resource, among their census tracts.

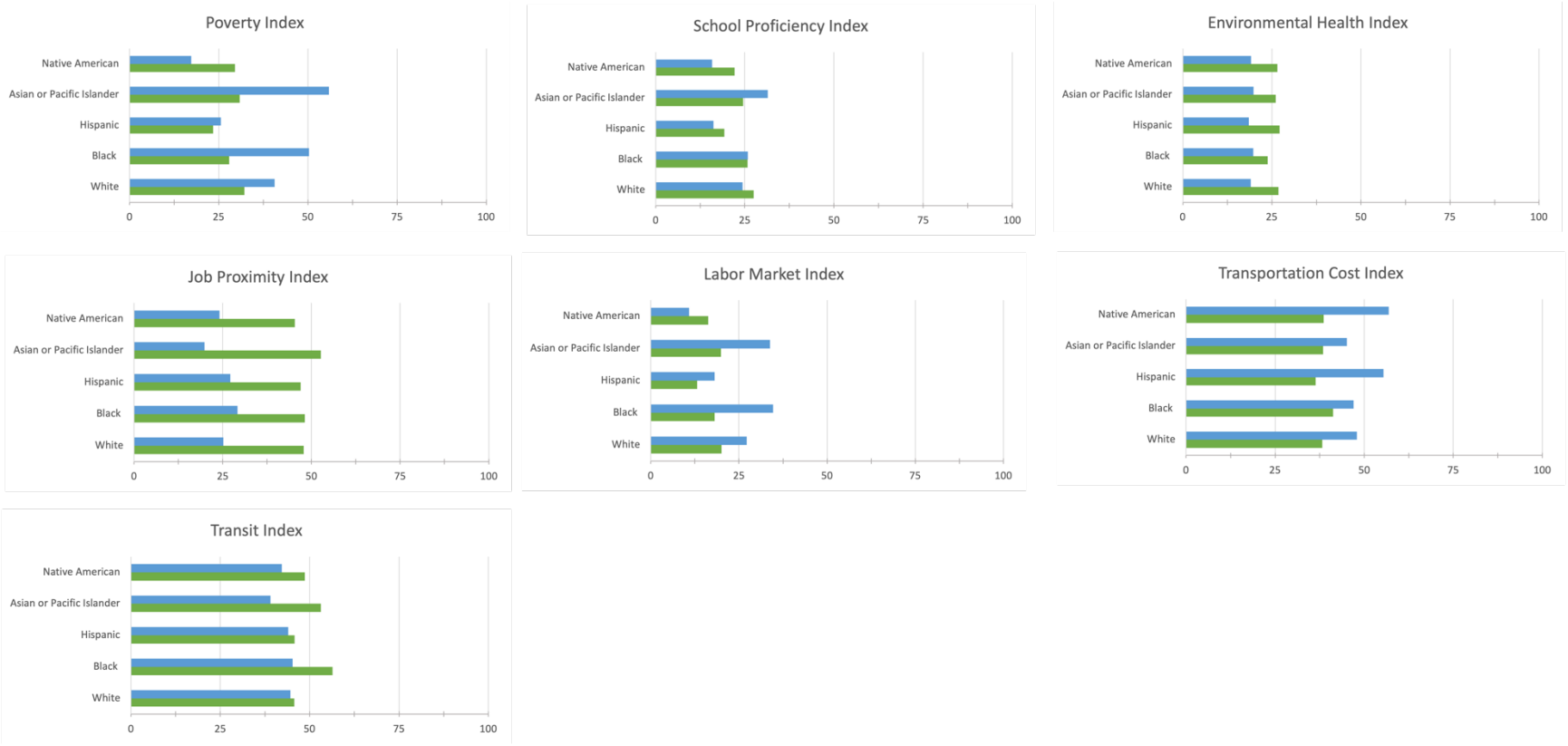
Economic Indicators

According to California Employment Development Department Local Area Unemployment Statistics (LAUS), Turlock experienced an unemployment rate of 5.6 percent in 2024. While this rate is a 52.5 percent decrease from unemployment rates in 2011, it is a 16.7 percent increase from the 2020 unemployment rate (4.8 percent). However, this is still relatively lower than the 7.7 percent unemployment rate for Stanislaus County in 2024.

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

The tract-level share of employed adults has been shown to be highly correlated with rates of upward economic mobility for low-income children. Adult unemployment is commonly considered to be an indicator of neighborhood disadvantage that affects not just the individuals who do not have jobs, but members of the entire community. Turlock's non-White Hispanic and Latino identifying residents have the lowest Labor Market Index scores followed by non-Hispanic Native Americans, then non-Hispanic Black residents. This pattern extends to Stanislaus County, although the Labor Market Index scores are overall lower in the County than in Turlock (see Chart D-7). In terms of unemployment, Countywide, 70.7 percent of unemployed residents identify as White, with 53.7 percent of them identifying as Hispanic or Latino and 46.3 percent as non-Hispanic or Latino, which is proportional to the county's demographics. In Turlock, 47.2 percent of the White non-Hispanic or Latino population is unemployed, which is comparable to Turlock as 48 percent of the population is White non-Hispanic.

Chart D-6: Opportunity Indices, Population Living Above the Poverty Level



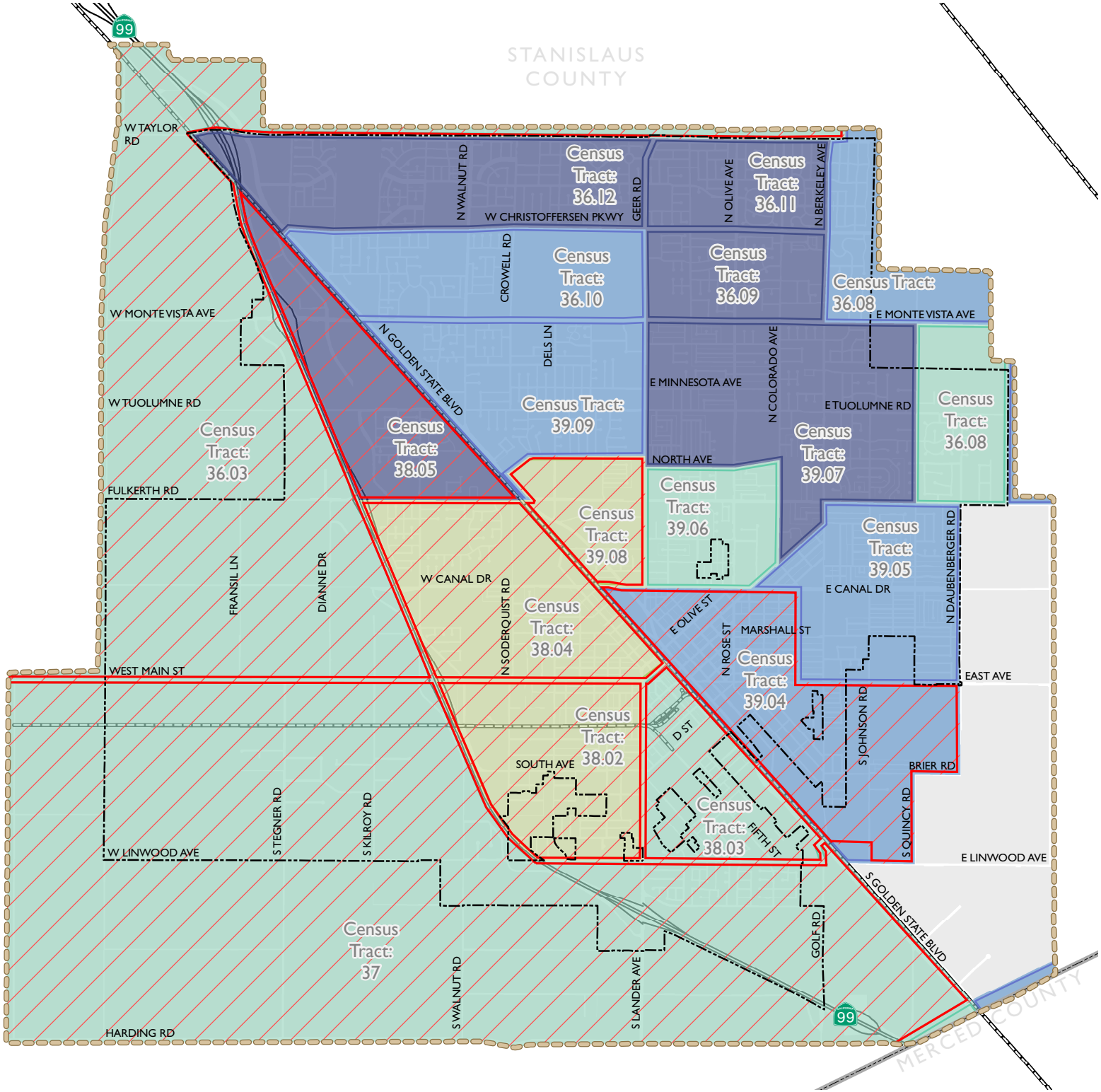
Source: HUD, AFFHT0006 Table 12, July 2020

Chart D-7: Opportunity Indices, Population Living Below the Poverty Level

Source: HUD, AFFHT0006 Table 12, July 2020

Map D-9

TCAC Opportunity Areas, Composite Score, Turlock



- SB 535 Disadvantaged Community
- Highest Resource
- High Resource
- Moderate Resource
- Low Resource
- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: CalEPA, 2022; HCD, 2024; City of Turlock, 2021; Dyett & Bhatia, 2024

The Jobs Proximity Index, which measures the physical distance between place of residence and jobs, is similar among all the census tracts in Turlock. However, the data does show differences among race and ethnicities within each tract. Non-White Hispanic residents have the highest Jobs Proximity Index score followed by non-Hispanic Native American and -Hispanic Black residents, who comprise a significant proportion of the city's non-White workers. This means they live close to where they work relative to the White population, as shown in Chart D-7. Turlock is 17 square miles, making access to work in various parts of it or other job centers such as Modesto possible by car. Commute patterns discussed in Chapter 2, Community Profile noted that 71.3 percent of workers in Turlock commute from outside the city, while 7,985 residents live and work in Turlock. Turlock residents can travel throughout Turlock with seven transit routes, where each route connects to the Turlock Transit Center, so residents can also reach Modesto, Ceres, and Keyes by a regional bus route that runs throughout the day.

The Task Force methodology uses four indicators to measure economic opportunity: poverty, adult education rate, employment rate, and the median home value of owner-occupied units. Four tracts with less positive economic outcome are adjacent to one another and mostly located west of Golden State Boulevard, along with Tract 39.08 on Geer Road and North Golden State Boulevard (see Map D-9). Overall, Turlock has slightly more tracts classified under less positive economic outcomes than those tracts classified as more positive economic outcomes. Tracts with more positive economic outcomes, scoring greater than 0.8, align with Highest and High Resource areas in the east and north of Turlock.

There are several organizations working to improve access to economic opportunity in Turlock and the greater Modesto region. Opportunity Stanislaus assists communities with their workforce readiness process, introducing people to financial incentives and financing programs, and by helping them locate appropriate sites and buildings to meet their needs. The organization's vision is to attract jobs that give more buying power to the workforce. Turlock works in collaboration with the Valley Sierra Small Business Development Center (SBDC), an arm of the Central California Small Business Development Center, whose mission is to help businesses start, grow, and succeed in the Modesto region. SBDC offers workshops, trainings, and classes for businesses, entrepreneurs, and individuals. It also acts as a resource center for new businesses with owners located in Stanislaus County and Tuolumne County, providing ongoing support to existing businesses. SBDC does not offer grants or loans itself but works closely with financial partners who offer a variety of loan programs, as well as other regional and community funding sources. In addition to support for small businesses, SBDC also provides workforce development services.

All together, these resources offer a variety of ways to access economic opportunity in Turlock likely influenced by variation among the area's industries and workforce skills and experience. The tracts with lower economic opportunity are the tracts concentrated where there are also concentrations of female-headed households, people falling under the poverty line, and multi-family housing. These tracts are likely where low wage workers can afford to live. Access to jobs for groups facing socioeconomic challenges is high as indicated by the Jobs Proximity Index score, likely due to proximity to industries with need for low-wage workers. The Labor Market Index score is higher in Turlock than the County, influenced by Turlock being considered one of the County's two urban centers with job centers and a university. Additionally, economic opportunity is supported by the presence of organizations discussed above working to improve workforce readiness and attract business development throughout the County.

Educational Indicators

There are 25 school districts in Stanislaus County, two of which serve Turlock: the Turlock Unified School District (TUSD) or Chatom Union School District (CUSD). Most of Turlock is in the Turlock Unified School District (TUSD). TUSD provides public elementary, middle, high school, in addition to an adult school and a charter school. CUSD has three facilities, two of which, Crowell Elementary and Crowell pre-school on Clayton Road in the unincorporated area, serve the western parts of tracts 37.00 and 38.02 between West Main Street and Harding Road. Crowell also serves the more sparsely populated unincorporated area to the west. About 85 percent of the Crowell students are economically disadvantaged, meaning their families are below the poverty line, and 76 percent are minority.[17] Crowell's math and reading scores compare poorly with the Turlock Unified School District (15 percent in math and 28 percent in reading compared with 31 and 40 percent in the TUSD).

Table D-6 summarizes test score results from the 2021-2022 Smarter Balanced assessments of math and English Language Arts (ELA), which forms part of the State's California Assessment of Student Performance and Progress (CAASPP). The proportion of students who meet or exceed standards in ELA or math in Turlock is higher than in Stanislaus County, but lower than in the State. When comparing test results between the two high schools in Turlock, Turlock High School had 23.4 percent of its students meet or exceed the standard for overall achievement and John H. Pitman High had 29.9 percent of its students meet or exceed the standard for overall achievement. Turlock High School serves the south and southeastern part of Turlock while John H. Pitman High School serves the more western and northern part of the city.

Table D-6: CAASP Scores

District/Region	*Percent Met or Exceeded Standard*	
	English Language Arts	*Mathematics*
State of California	47.1%	33.4%
Stanislaus County	37.7%	23.1%
Turlock Unified	40.4%	25.3%

Source: California Department of Education, CAASPP, Smarter Balanced Summative Assessments, 2021-2022

Students of color in Turlock received lower test scores in both math and English than non-Hispanic White students.[18] While non-Hispanic White students received scores (53.0 percent in English and 38.0 percent in math) that are greater than the State and County averages (see Table D-6), students of color received higher scores than the County averages but lower than the State (43.9 percent in English and 30.1 percent in math). In terms of the County, students of color are doing better in Turlock but there is still an educational gap within the city between White and non-White students. Notably, Black (29.7 percent in English and 13.3 percent in math) and Hispanic (32.6 percent in English and 17.2 percent in math) students received the lowest scores while other races/ethnicities scored closer to the average in the city. Barriers to educational opportunity for students of color might relate to housing choice because census tracts with lower educational opportunity scores also have higher shares of the Hispanic and Black populations of the

[17] U.S. News, Crowell Elementary, 2024. https://www.usnews.com/education/k12/california/crowell-elementary-235576

[18] California Department of Education, CAASPP, Smarter Balanced Summative Assessments, 2021-2022.

city. Other barriers that are probably contributing to the gap include language, economic factors, and the lack of educational resources between White students and students of color in Turlock.

As Turlock experiences lower levels of educational opportunity compared to the State, both TUSD and CUSD are proactively taking steps to improve scholastic performance for local students and expand on campus support services through a variety of specialized efforts. CUSD provides instructional support programs that include homework support and academic intervention including math and reading and after-school childcare program that provides supervision, homework support, and recreational activities. Further, TUSD operates a Family Resource Center that provides resources, programs, and services to diverse Turlock families, that include school readiness programs for students in need, parent workshops, food distribution drives, and mobile health clinics. Although there are some areas in the City with lower educational opportunity scores, overall Turlock scores higher than the County and its students of color fair better than students on average in the County. Programs provided by CUSD and TUSD can continue to improve the educational opportunity of students in Turlock.

The TCAC Opportunity Areas education score, which quantifies access to educational opportunity, is provided in Map D-11. Eight of Turlock's fifteen tracts, including the area served by the Chatom District, have the second lowest range of education scores, four have outcomes ranging from .50 to .75, and three fall into the "more positive education outcome" category with outcomes above .75. The two most northern census tracts with the best education outcome scores are in the area served by Pitman High School, while none of the tracts with the best education outcome scores are in Turlock High School's boundary. Although there may be a slight difference in the two school boundary's outcomes, the High Segregation and Poverty tract and the Racially Ethnically Area of Affluence tract are both located in the lower performing Turlock High School boundary. Though there are some areas in the city with lower educational opportunity scores, overall Turlock scores higher than the County and its students of color fare better than students on average in the County.

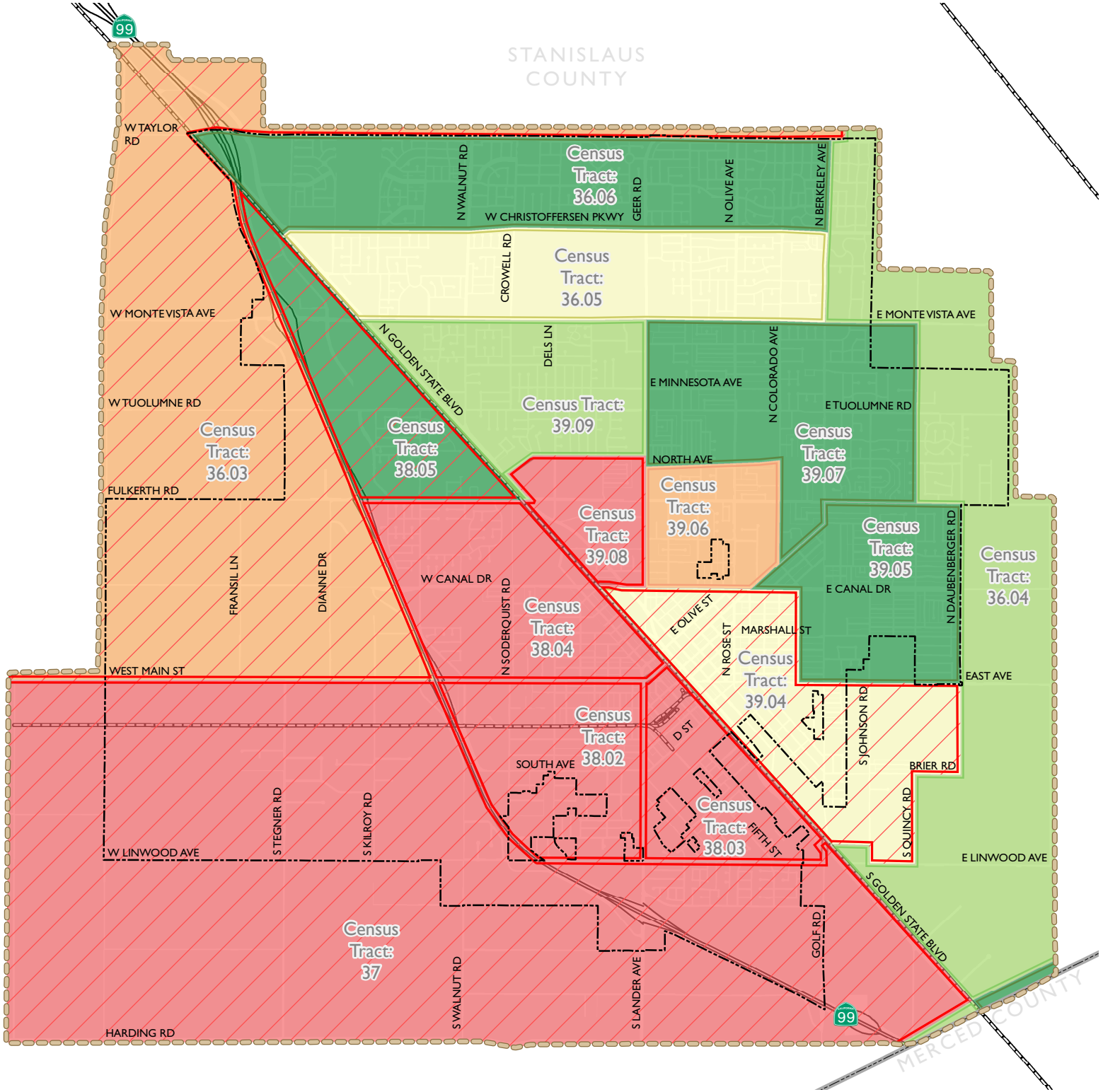
Environmental Indicators

The environmental opportunity score in the TCAC Opportunity Map is based on CalEnviroScreen 4.0 pollution indicators and values, as shown on Map D-12. The CalEnviroScreen is a mapping tool that helps identify areas in the state that are most impacted by various sources of pollution. The score considers four major indicators: exposure (e.g., air quality, lead risk, etc.), environmental effects (e.g., cardiovascular disease, asthmas, etc.), socioeconomic factors (e.g., poverty, unemployment, etc.), and sensitive populations. Disadvantaged communities as defined by CalEnviroScreen 4.0 data are only located in the southwest portion of Turlock, including Downtown and tracts south of Golden State Boulevard. This correlates with the areas of lowest resources and one area of highest segregation and poverty within Turlock. As disadvantaged communities exist within Turlock, the City of Turlock is required to adopt an environmental justice element.

Map D-12 visualizes access to environmental opportunity in Turlock based on the TCAC indicators from CalEnviroScreen 4.0. Using these indicators, all of Turlock census tracts west of Golden State Boulevard are ranked as having the least positive outcomes. Tracts 36.03, 37.00, 38.02, 38.03. and 38.04 have the lowest potential for positive outcomes (less than 25 percent) and 38.05, which is closer to the more affluent areas in the northern part of the city, scores slightly higher (25 to 50 percent). Tracts with the more positive environmental outcomes are located in north and east Turlock, Tracts 36.06 and 39.07, which also align with Highest Resource areas and High White Segregation areas. CalEnvironScreen 4.0 helps to identify communities disproportionately burdened by multiple pollution sources and with population characteristics making them more sensitive to pollution. Tract 38.02, the only High Segregation and Poverty Tract in Turlock, in the overall 98th percentile for pollution burdens and vulnerabilities relative to the rest

Map D-10

TCAC Opportunity Areas, Economic Score, Turlock



- SB 535 Disadvantaged Community
- < 0.2 (Less Positive Economic Outcomes)
- > 0.2 – 0.4
- > 0.4 – 0.6
- > 0.6 – 0.8
- > 0.8 (More Positive Economic Outcomes)

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

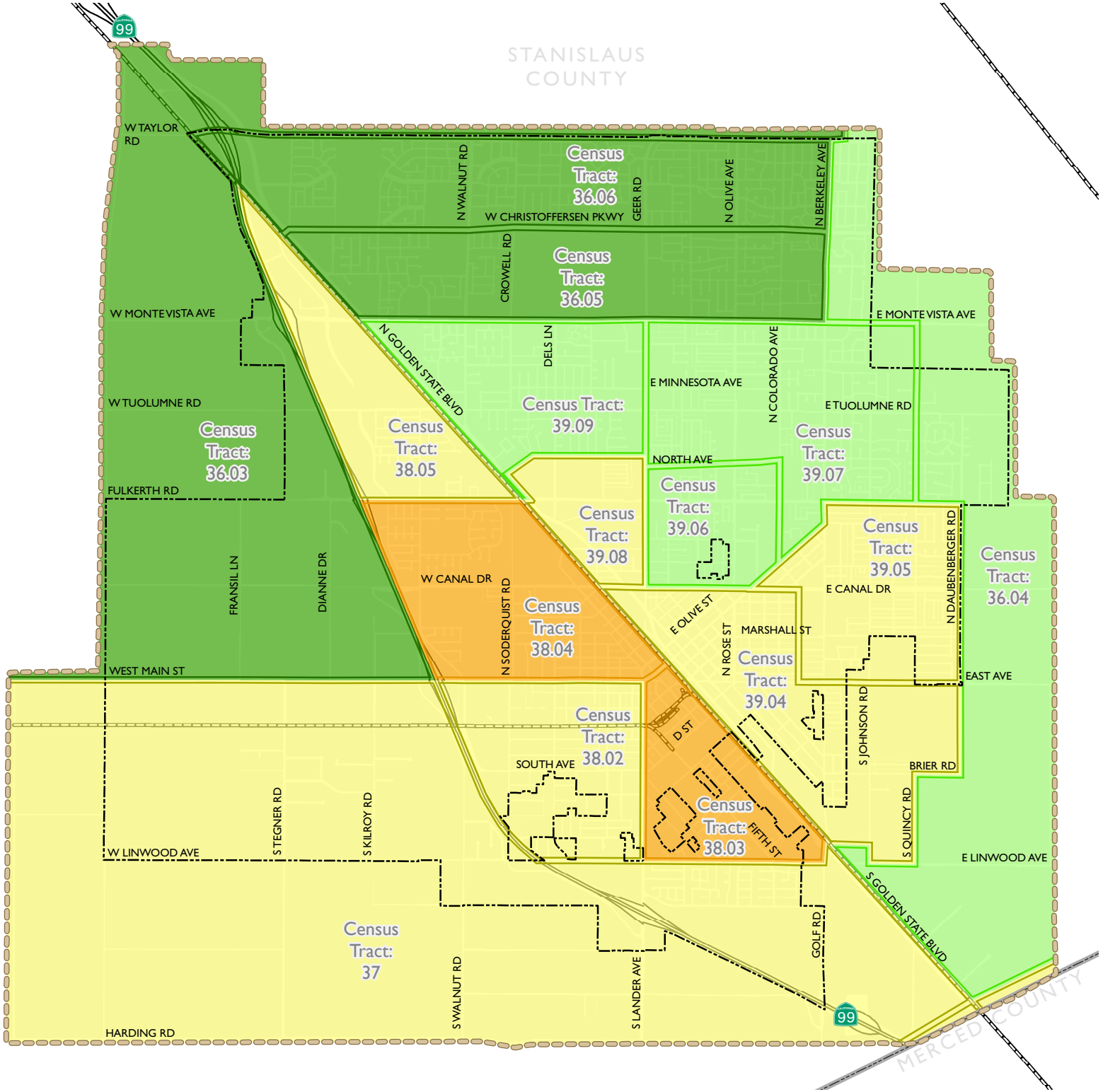
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: CalEPA, 2022; HCD, 2023; City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-11

TCAC Opportunity Areas, Education Score, Turlock



- < .25 (Less Positive Education Outcomes)
- 0.25 - 0.50
- 0.50 - 0.75
- > .75 (More Positive Education Outcomes)

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

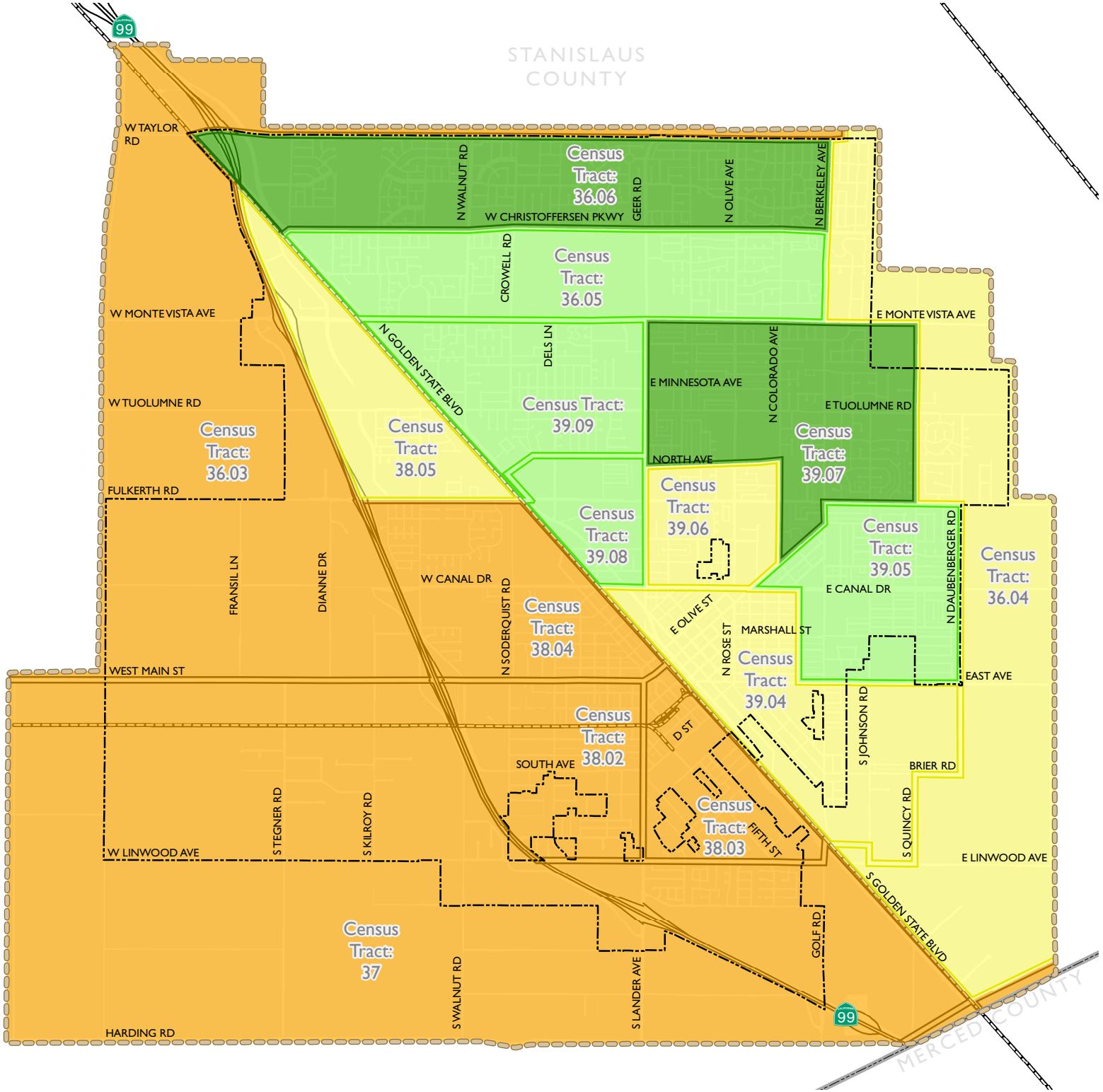
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2023; City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-12

TCAC Opportunity Areas, Environmental Score, Turlock



- < .25 (Less Positive Environmental Outcomes)
- .25 - .50
- .50 - .75
- .75 - 1 (More Positive Environmental Outcomes)

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2023; City of Turlock, 2021; Dyett & Bhatia, 2024

of the State. This can be caused by a variety of reasons, such as the area's proximity to industrial land uses and SR-99 freeway, the volume of truck traffic on local roads serving auto-service businesses, presence of hazardous materials sites, and lack of tree canopy coverage and parks.

Tract 38.02, the only High Segregation and Poverty Tract in Turlock, is in the overall 98th percentile for pollution burdens and vulnerabilities relative to the rest of the State. SB 535 (De Leon, 2012) directed that proceeds from the State's Cap and Trade Program be used for programs to reduce emissions of greenhouse gases with at least a quarter of the proceeds going to projects that provide a benefit to disadvantaged communities (DACs) and at least 10 percent of the funds be directed to projects located within those communities. Assembly Bill 1550 (Gomez, Chapter 369, Statutes of 2016) directed CalEPA to identify DACs and established the currently applicable minimum funding levels:

- At least 25 percent of funds must be allocated toward DACs,
- At least 5 percent must be allocated toward projects within low-income communities or benefiting low-income households, and

At least 5 percent must be allocated toward projects within and benefiting low-income communities, or low-income households, that are outside of a CalEPA-defined DAC but within ½ mile of a disadvantaged community.[19] The City should investigate the potential for funding projects that could benefit lower-income residents in Tract 38.02.

For the population above poverty level in the City, all races and ethnicities scored between 19 and 20 for the Environmental Health index (see Chart D-6) with Asian or Pacific Islander residents scoring the highest (20.9) and Hispanic residents the lowest, though not by much (19.4). Among those under the poverty level, a similar trend was inferred, Asian or Pacific Islander residents scoring the highest (19.8) and Hispanic residents the lowest, again, not by much (18.5). For both those above and under poverty, the County scored higher.

Transportation

Turlock is the northern terminus of Route 165 that connects the City to State Route 152 and Interstate 5 to the south. Travelling by bicycle and foot can be easy due to flat topography but the heat during the summer can limit this mode. In Stanislaus County, many people drive rather than use public transportation, but there are many alternative options available to those who chose not to drive or are not able to drive, such as seniors or those with mobility disabilities throughout the County. Existing bus systems include the Stanislaus Regional Transit (StaRT) which serves the County with eight bus routes travelling throughout it; the Ceres Area Transit (CAT) which serves Ceres and its surrounding unincorporated area; Modesto AreaExpress (MAX) which offers bus service throughout the Modesto urban areas with 21 routes; and Turlock Transit which provides transit serve with seven routes within the community. Services include fixed route and dial-a-ride paratransit service to eligible individuals in Turlock. The program offers rides within a specified zone for those 65 years of age and over, Medicare card holders, elementary school students, and ADA paratransit eligible people.

[19] CalEPA, California Climate Investments to Benefit Disadvantaged Communities https://calepa.ca.gov/envjustice/ghginvest/ and https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/

Other modes of public transit available to Turlock residents include regional rail service with connections to other public transit. Amtrak's San Joaquins regional line serves Turlock and Denair with six daily trains between Bakersfield to the south and Oakland and Sacramento to the north. The Turlock-Denair station is located on North Santa Fe Avenue close to the northeast corner of the city. The Altamont Commuter Express (ACE) currently provides service to Stanislaus County between Stockton and San Jose with stops in several Bay Area employment centers. At present, ACE doesn't provide direct service to Turlock but a new station on Golden State Boulevard has been funded by the State and is expected to open by 2029.[20] The project is being funded with a $40 million grant that ACE Other services include Modesto Area Express (MAX), StaRT Commuter, and California Vanpool Authority (CalVans) all operate programs connecting Stanislaus County residents to transit but do not currently serve Turlock directly.

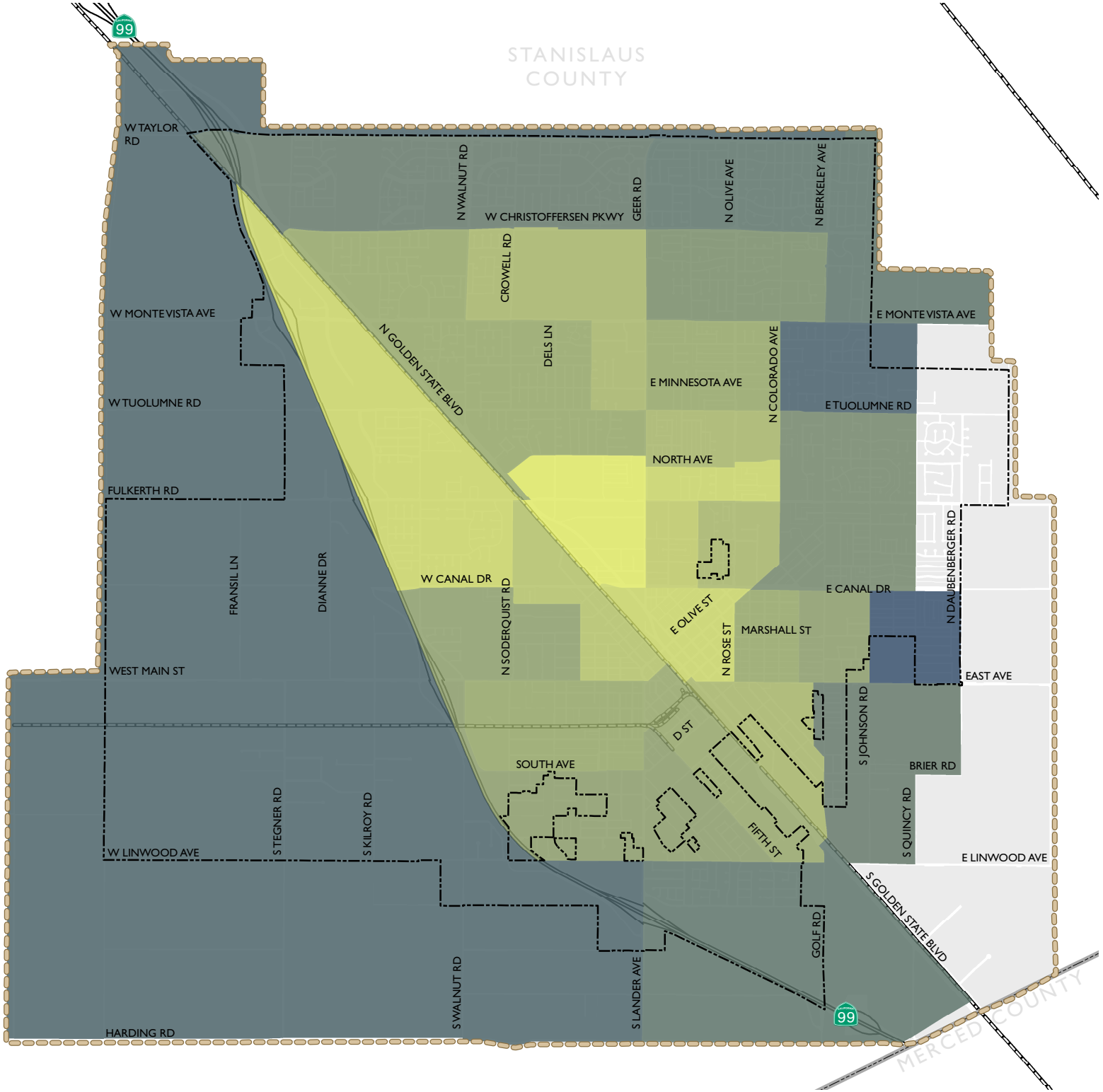
HUD's Location Affordability Index uses data from the American Community Survey to evaluate transportation cost relative to housing costs. Index values range from zero to 100 and are reported by race. In the County, the low transportation cost index is higher across all races/ethnicities in Turlock than in the County for those below and above poverty. This indicates transit allows low-income single parent households to afford transportation. Transit index scores across all races/ethnicities were higher in the County than Turlock likely because across the County (and heavily influenced by Modesto), there are more people with lower incomes taking transit than in Turlock. Overall, transit is affordable and used by people who need it in Turlock.

Another tool for comparing transit access is the Center for Neighborhood Technology's Housing and Transportation Affordability Index, which provides a basis for measuring housing affordability by factoring in the cost of transportation. Turlock, Modesto, and Stanislaus County all rank about the same with housing accounting for 29 percent of expenses in both Turlock and the County and 28 percent in Modesto. Turlock and Stanislaus County score 4.3 for Job Access compared with 5.2 for Modesto, as shown on Map D-13. Within the city of Turlock, areas with the highest combined cost of housing and transportation are located farthest from the center of the city suggesting that neighborhoods closer to the Downtown are more location efficient and affordable. Most of the tracts between West Christoffersen Parkway and Linwood Avenue and east of Highway 99, including the CSUS campus and the five census tracts where 20 to 40 percent of the population live below the poverty line (displayed on Map D-6 above) and have combined costs that comprise less than 50 percent of household expenses.

[20] *Turlock Journal*, December 7, 2021 https://www.turlockjournal.com/news/government/ace-train-could-be-running-turlock-2025/; *Railway Track and Structures* (RT&S), December 29, 2023 https://www.rtands.com/passenger/stanislaus-county-receives-13-million-for-ace-expansion/

Map D-13

Turlock Transit Performance Score



Overall transit score that looks at connectivity, access to jobs,

- < 1
- 1 - 2
- 2 - 4
- 4 - 5
- 5 - 6
- 6 - 7
- 7 - 9
- 9
- No

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/13/2024

0 ¼ ½ 1 Miles

Source: Center for Neighborhood Technology, 2023
City of Turlock, 2021; Dyett & Bhatia, 2024

D.5 Disproportionate Housing Needs & Displacement Risk

Disproportionate housing need refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. This analysis evaluates disproportionate housing need in Turlock by assessing cost burden, overcrowding, and displacement risk within Turlock and compared to Stanislaus County and the Modesto region when applicable.

COST BURDEN

Cost burden, or overpayment, is defined as monthly shelter costs exceeding 30 percent of household income. Severe cost burden is defined as paying over 50 percent of household income for shelter costs. Shelter cost is defined as the monthly owner costs (mortgages, deed of trust, contracts to purchase or similar debts on the property and taxes, insurance on the property, and utilities) or the gross rent (contract rent plus the estimated monthly cost of utilities). The Stanislaus Urban County & City of Turlock Consortium Consolidated Plan (FY 2020-2025) provides the most recent estimates of cost burden by tenure and income category. [21] Estimates use the HUD Area Median Family Income (HAMFI) to determine overpayment. HAMFI is the median family income calculated by HUD for each jurisdiction to determine Fair Market Rents (FMRs) and income limits for HUD programs. HAMFI is not necessarily equivalent to other median income calculations due to a series of adjustments made by HUD.

The Consolidated Plan uses data from the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS), which estimates that 5,295 households in Turlock (21.0 percent) were cost burdened and an additional 4,465 households experienced severe cost burden (17.7 percent). This means that just under half of all Turlock households experience some level of cost burden. Of the 9,760 households experiencing some level of cost burden, 1,800 of them are considered moderate- or above-moderate-income and 7,960 are considered lower-income. Even though some higher-income households may be classified as "cost burdened," it is clear that housing affordability is particularly pressing for lower-income households in Turlock.

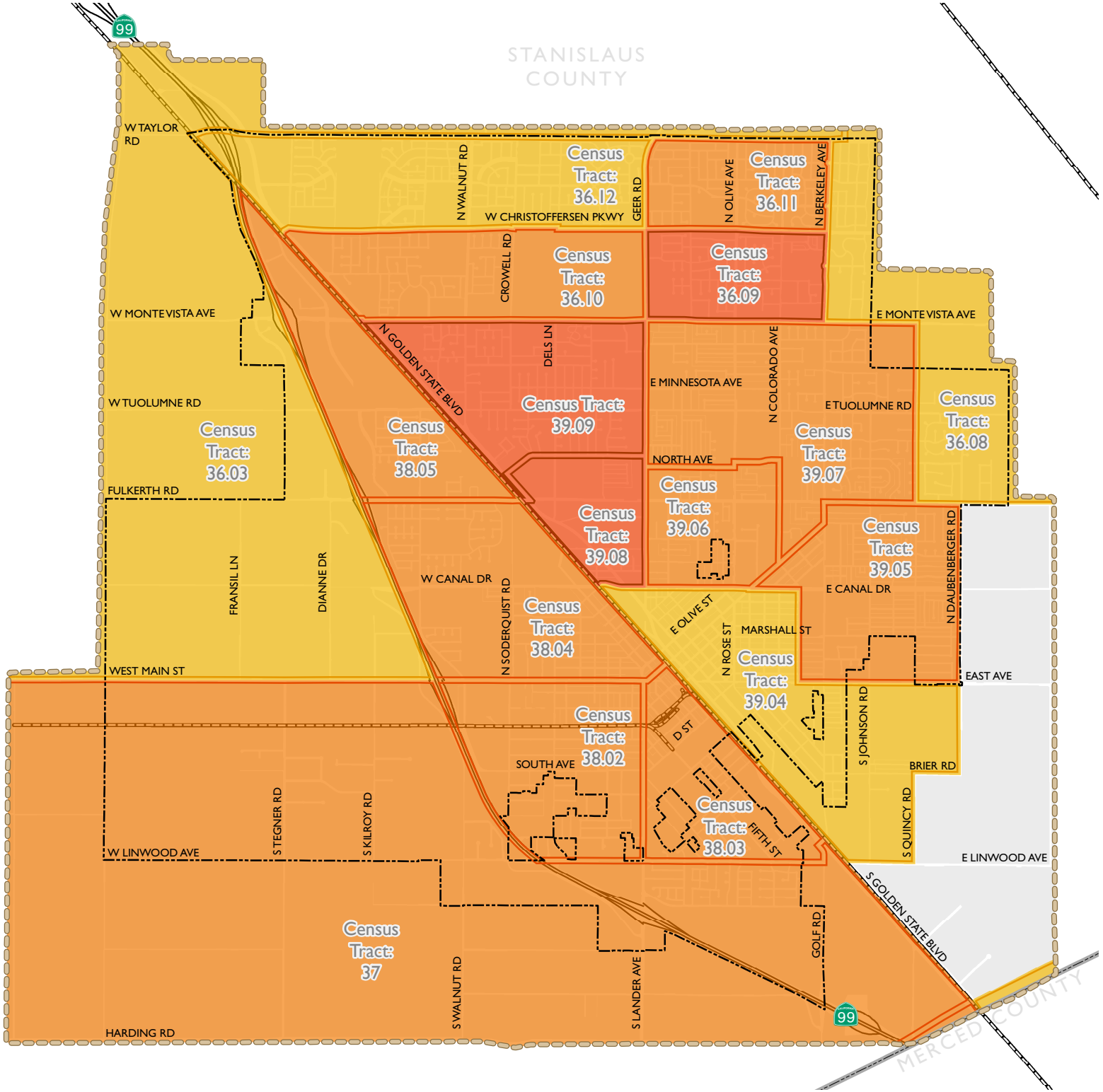
Available data show that cost burden for renters and owners in Turlock is more evenly distributed by race and ethnicity than by location. (See Maps D-14 and D-15 and Charts D-8 and D-9) Not surprisingly, there is a relatively high correlation between cost burden and income. Renters in Turlock are more likely to be cost burdened than owners--50.3 percent of all renters experience some level of cost burden while only 28.8 percent of owners do. Elsewhere in the County, the AFFH data viewer shows Modesto also has concentrations of cost burdened renters and homeowners and more renters are cost burdened than homeowners throughout the County, and especially in Modesto. Notably between 60 and 80 percent of homeowners in the tract immediately west of Turlock are cost burdened.

White and Hispanic/Latino homeowners have similar rates of cost burden, Black homeowners have a higher level, and Asian households are less burdened. (The data for cost-burdened Asian Pacific Islander (API)

[21] Stanislaus Urban County & City of Turlock Consolidated Plan Fiscal Year 2020-2025 https://www.stancounty.com/planning/cdbg/documents/consolidated/2020-2025-consolidated-plan-final.pdf

Map D-14

Renter Cost Burden, 2019



- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

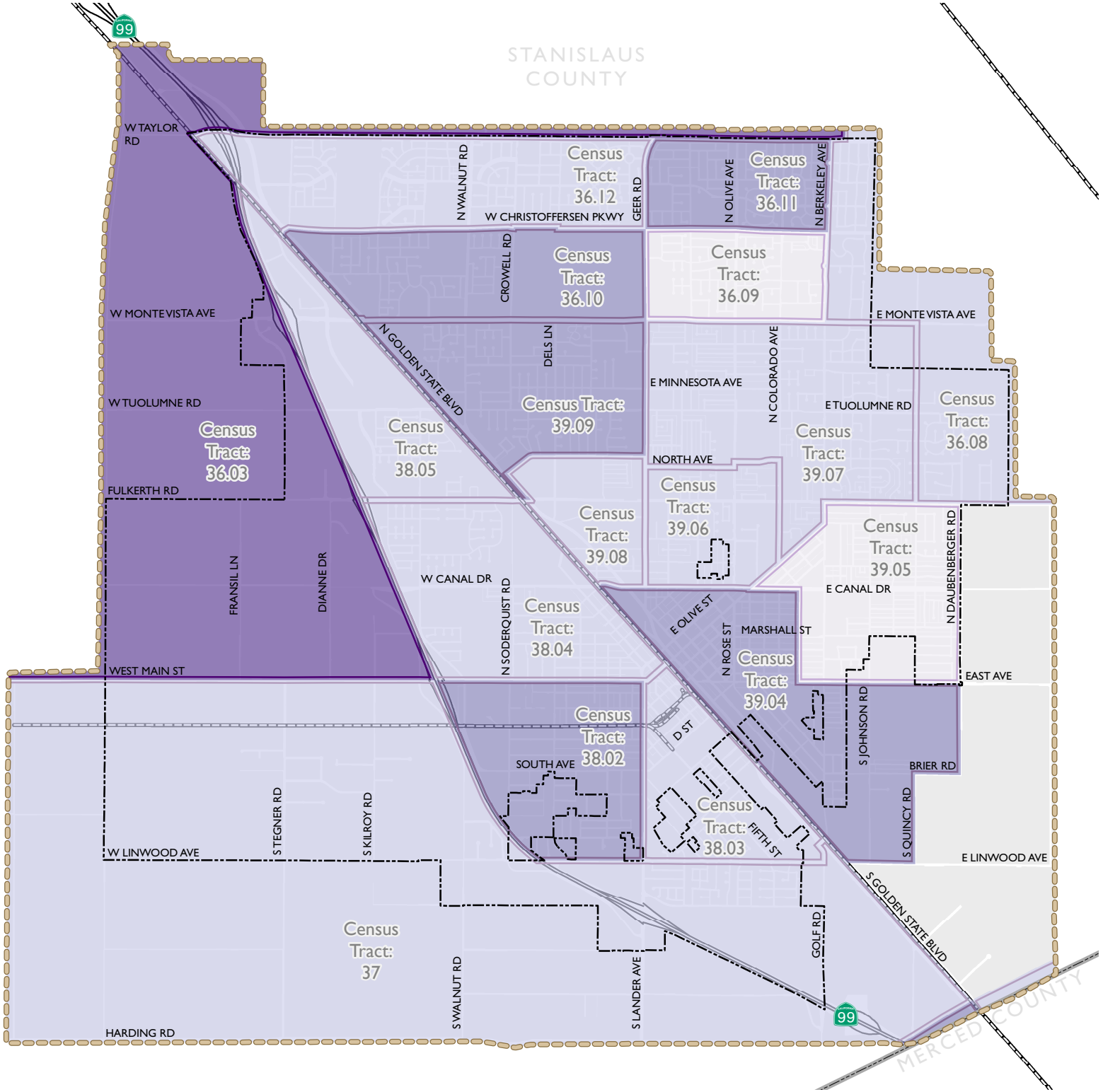
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2022;
City of Turlock, 2021; Dyett & Bhatia, 2024

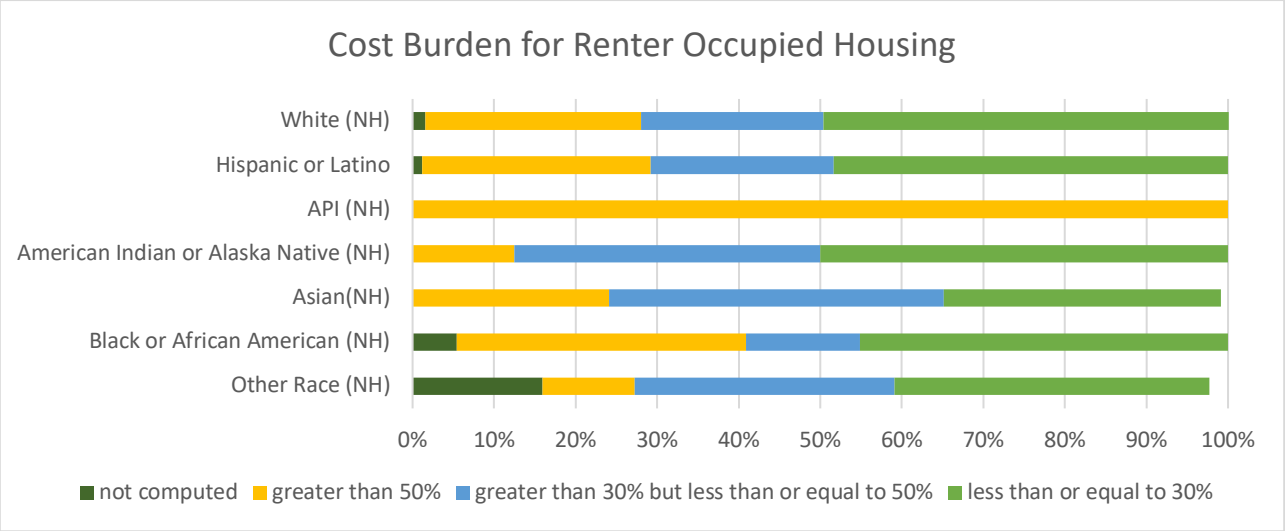
Map D-15

Homeowner Cost Burden, 2019



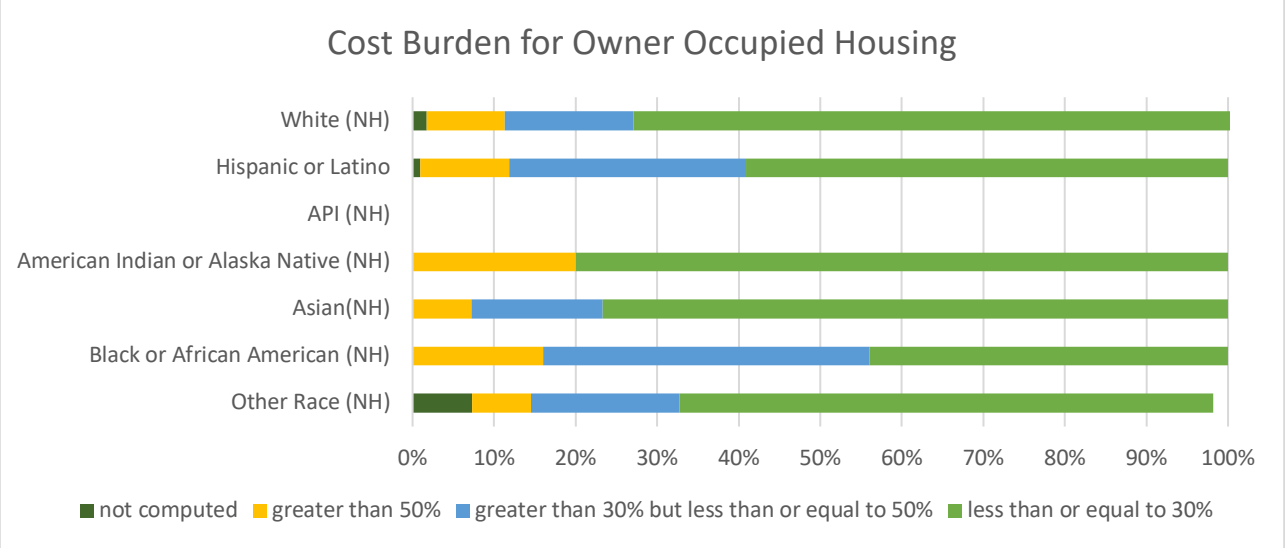
Source: HCD, 2022;
City of Turlock, 2021; Dyett & Bhatia, 2024

Chart D-8: Cost Burden for Renter Occupied Housing by Race/Ethnicity in Turlock



Source: HCD AFFH Data and Mapping Resources (2019 ACS 5-year estimates)

Chart D-9: Cost Burden for Owner Occupied Housing by Race/Ethnicity in Turlock



Source: HCD AFFH Data and Mapping Resources (2019 ACS 5-year estimates)

households, who represent a very small percentage of the population, is statistically insignificant.) The census tract with the highest rate of burdened homeowners (Tract 38.02) is one of two tracts in Turlock where 30 to 40 percent of the population had reported incomes below the poverty line in 2019. Tract 38.02 is also the only one in Turlock that meets the threshold for High Segregation and Poverty and the highest level of overcrowding in the community. (See Maps D-8 and D-16)

OVERCROWDING

The U.S. Census deems housing overcrowded when there are more than 1.01 persons per room (excluding bathrooms and kitchens) in an occupied housing unit and severely overcrowded when there are more than 1.5 persons per room. The Census reported that 1,317 out of 25,444 occupied housing units in Turlock were either overcrowded or severely overcrowded (5.2 percent), which is lower than the rate in Stanislaus County (7.1 percent) and slightly less than Modesto where 5.9 percent of all households were overcrowded.

In both Turlock and the County, renters are more likely to live in crowded housing. In Turlock, 0.6 percent of owners live in severely overcrowded housing and 2.7 percent of owners live in crowded housing, while 2.4 percent of renters live in severely crowded housing and 5.8 percent of renters live in overcrowded housing. In the County, 1.1 percent of owners live in severely overcrowded housing and 3.4 percent of owners live in overcrowded housing, while 2.3 percent of renters live in severely overcrowded housing and 7.9 percent of renters live in overcrowded housing.

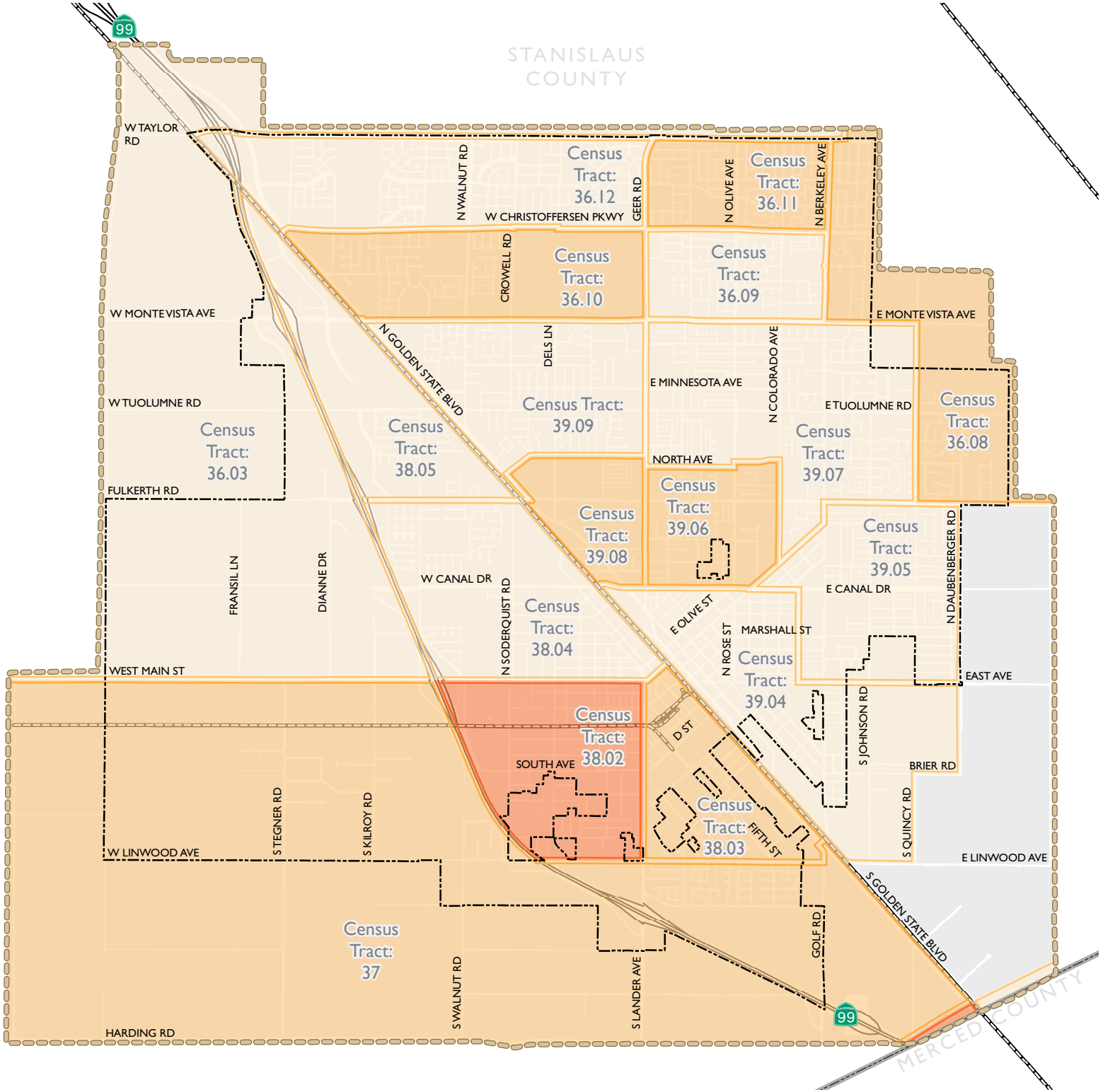
Overall, the rate of overcrowding in Turlock is lower than Stanislaus County and the state. In Turlock as shown in Map D-16, there is one tract that experiences higher rates of overcrowding, Tract 38.02, which coincides with the City's only High Segregation and Poverty tract, where 214 households or 10.4 percent of households are overcrowded. The rest of the city experiences less than 10 percent of overcrowding. Although they represent a very small share of the total population, Native Hawaiians and Other Pacific Islanders are nearly three times more likely to experience overcrowding than other races and ethnicities in Turlock. Overcrowding can result when there are not enough adequately sized units within a community, or when high housing costs relative to income force too many individuals or families to share housing. Overcrowding particularly affects lower-income households and can typically occur when there is an inadequate supply of affordable housing.

DISPLACEMENT RISK

Lower-income people of color displaced from other sectors of the Bay Area, like San Francisco and Oakland, are increasingly moving to the Central Valley. Despite rising housing costs, much of Stanislaus County remains relatively affordable and may be less prone to the displacement pressures faced in the Bay Area region. Although housing costs are low relative to the Bay Area, the region has still seen an increase in the cost of housing. Home values in Turlock have increased by 124 percent since 2011, with the value of smaller units (1 and 2-bedrooms) seeing the steepest increase. From 2014 to 2024, 1-bedroom homes increased in value by 215.8 percent during the period, from $89,689 to $283,246, while 2-bedroom homes increased in value by 159.51 percent during the period, from $137,119 to $355,830. This indicates a mismatch of supply and demand. At $428,929, the average home value in Turlock was well beyond reach for Moderate- and Lower-Income Households in 2021. As housing costs increase, this gap may expand and subject lower-income households to displacement pressures that have otherwise been absent or relatively low in the city. Communities of color may be particularly impacted by this dynamic because they are disproportionally low-income .

Map D-16

Overcrowded Households, Turlock



Less than 5%
5% - 10%
10% - 15%

Study Area Boundary
City Limit & County Island
County
Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: HCD, 2020; City of Turlock, 2021; Dyett & Bhatia, 2024

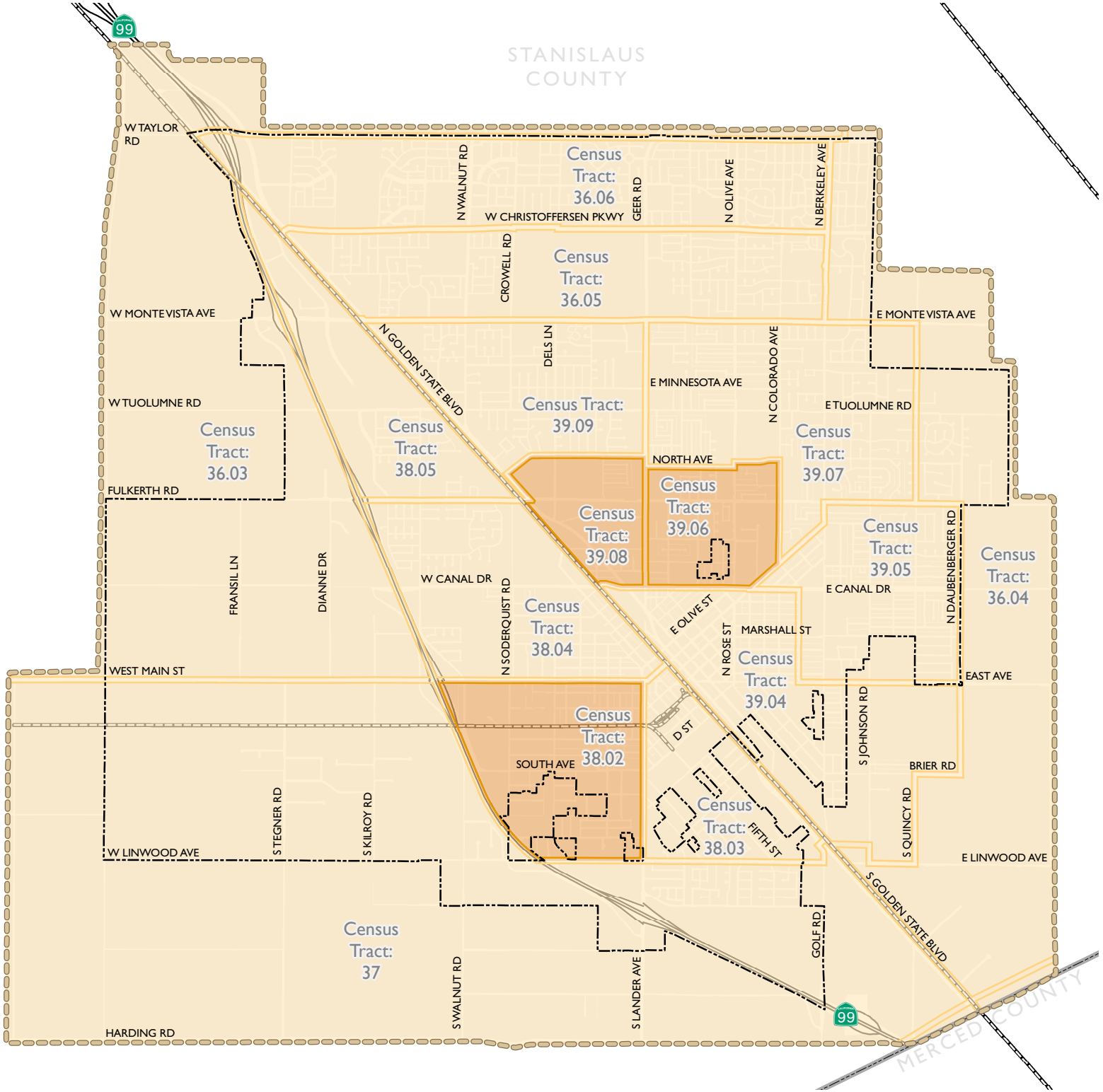
The University of California Urban Displacement Project (UDP) has used housing and demographic data from the US Census and real estate market data from Zillow to classify census tracts according to "displacement" typologies. The California Estimated Displacement Model (EDR) identifies varying levels of displacement risk for low-income renter households in all census tracts in California. Displacement risk means that in 2019 a census tract had characteristics which, according to the model, are strongly correlated with more low-income renter population loss than gain. In other words, the model estimates that more low-income households left these neighborhoods than moved in. Because the model uses 2015-2019 data, the correlations between tract characteristics and low-income renter population loss are only based on this period. Tracts are assigned to one of the following categories:

- Low Data Quality: the tract has less than 500 total households or the census margins of error were greater than 15% of the estimate (shaded gray).
- Lower Displacement Risk: the model estimates that the loss of low-income households is less than the gain in low-income households. However, some of these areas may have small pockets of displacement within their boundaries.
- At Risk of Displacement: the model estimates there is potential displacement or risk of displacement of the given population in these tracts.
- Elevated Displacement: the model estimates there is a small amount of displacement (e.g., 10%) of the given population.
- High Displacement: the model estimates there is a relatively high amount of displacement (e.g., 20%) of the given population.
- Extreme Displacement: the model estimates there is an extreme level of displacement (e.g., greater than 20%) of the given population.

Based on the data, all of Turlock is considered to have some potential for displacement but three tracts in the central part of the city (Tracts 38.02, 39.06, and 39.08 are classified as "at risk" for displacement. All three tracts were among the five that had the highest percentage of residents with income below the poverty line in Turlock. One tract, Tract 38.02, identified as at risk of displacement is also identified as High Segregation and Poverty, while another tract, Tract 39.06, was identified as most percentage of overcrowded households, and most low to moderate income population. A similar pattern emerged in Modesto where three tracts in the center and southern portion of Turlock were identified as "Probable Displacement" by UDP, 2022 (see Map D-17). Much of the protection for displacement in Turlock comes from state law. All multifamily units in Turlock are protected by the State's Tenant Protections Act of 2019 (AB 1482), which includes an annual rent cap and just-cause protections. The City does not have any additional local rent stabilization or just-cause eviction policies in place. Turlock has granted up to $1,000 to households impacted by temporary or permanent relocation from public funds, as noted in the City of Turlock Housing Element 2015-2023. Funding beyond $1,000 is disbursed as a low-interest loan. Specifically, this was applied to an instance when four families who were living in a four-plex on Lambert Way were affected by renovation work on the property. The amount of the grant is tied to the HUD requirements in the Uniform Relocation Act.

Map D-17

Gentrification and Displacement Typologies, Turlock



Lower Displacement Risk
At Risk of Displacement

Study Area Boundary
City Limit & County Island
County
Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: California Urban Displacement Project, 2022; City of Turlock, 2021; Dyett & Bhatia, 2024

HOMELESSNESS

Preliminary numbers from the 2024 homeless count tallied 2,052 persons countywide including 201 in Turlock and 1,622 in Modesto.[22] The number of people experiencing homelessness in Turlock decreased 13.7 percent from 2023, which is significantly less than the 1.2 percent drop in Modesto and the 1.9 percent decline in the county total. The Turlock homeless count in 2023 was 233, which was almost the same as the number counted in 2020 (232) but an increase of 22 from 2022. The preliminary 2024 count for Turlock was 9.7 percent of the total homeless in Stanislaus County, a decline from 11.1 percent of the total number of homeless persons in Stanislaus County in 2023.[23]

The results from the counts have ranged from a low of 1,857 in 2022 to a high of 2,957. Even though there has been some success in providing housing, according to the Stanislaus Community System of Care, which conducts the annual counts, the variation could also be affected by factors such as the number of volunteers participating and how well the count is organized. It should also be noted that the count includes those staying in emergency shelters, government-paid motel rooms, and transitional housing as well as those sleeping in cars, recreational vehicles, and tent encampments but does not account for people who are temporarily staying with friends or family or who are paying for their own motel rooms. There are currently two homeless or transitional shelters in Turlock including the Children's Crisis Center and the Turlock Gospel Mission Shelter.

People of color are disproportionately represented among those who were counted. In 2023, Black and American Indian or Alaska Native account for 10.8 percent and 6.1 percent of homeless Stanislaus residents respectively but represent only 2.7 and 4.0 percent of the overall population. Most of the homeless population in Turlock and in the Stanislaus County Planning Area continues to be comprised of White and Hispanic persons—71 percent White and 37 percent Hispanic in the county in 2023.

State law (SB 2 (Cedillo)) requires all jurisdictions to have at least one zone (where residential uses are allowed) in which at least one year-round emergency shelter is permitted by right. Zoning codes must also allow low-barrier navigation centers To meet the requirements of this legislation, Chapter 4 Housing Action Plan includes programs that will bring the City into compliance with SB 2 by amending its zoning ordinance or entering into a multi-jurisdictional agreement to provide a homeless shelter. The Action Plan also commits the city to providing financial assistance to nonprofit agencies for the establishment of emergency, supportive, and transitional housing. Because Modesto is the largest city in Stanislaus County and the county seat, it offers the widest range of emergency shelters and transitional housing in the county including 13 facilities with 896 beds. Turlock has four emergency shelters--the Gospel Mission serves men, women, and children; We Care temporary shelter for homeless men; Haven Women's Shelter; and the Children's Crisis Center. The City maintains a web page called Homelessness in Turlock https://www.turlock.ca.us/government/homelessnessinturlock/ that includes links to videos of meetings the City held to receive feedback on homelessness, a resource guide, and a list of service providers in the Turlock area including addresses, hours of operation and links to provider websites. See Appendix B, Housing Needs Assessment, and Appendix C, Constraints Analysis, of this Housing Element for more information about homelessness in Turlock and available resources.

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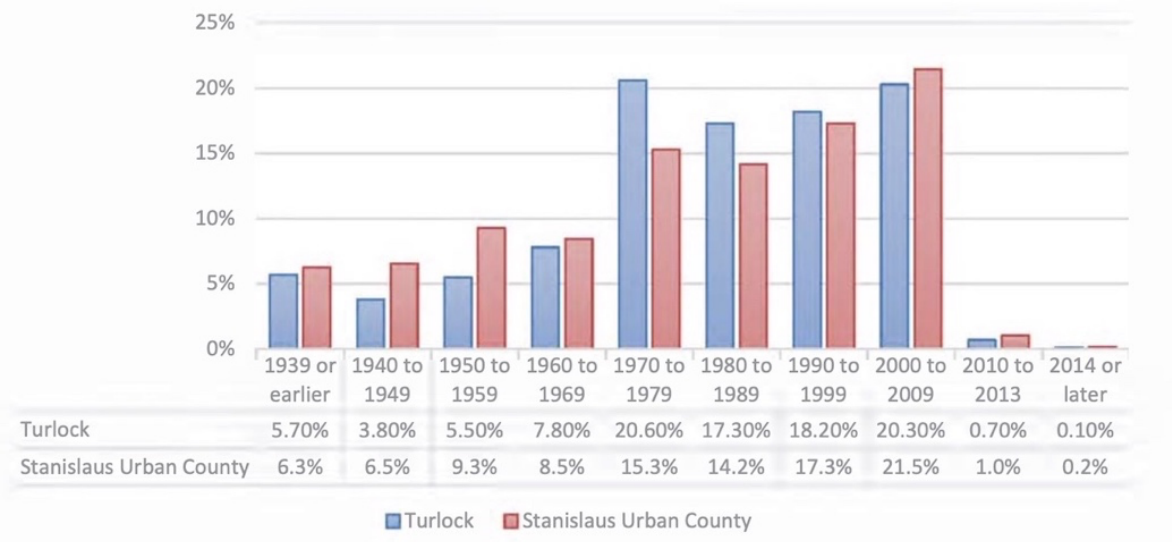
[22] The Modesto. Modesto area's latest homeless count for 2024 is in. What stories do they tell? Available: https://www.yahoo.com/news/modesto-area-latest-homeless-count-133000188.html

[23] Stanislaus County, 2023 Stanislaus County Homeless Point-in-Time Count, Executive Summary. Available: https://www.stancounty.com/newsfeed/pdf/executive-summary-english.pdf

SUBSTANDARD HOUSING

The U.S. Census does not include specific data on substandard housing, but it does provide information about housing problems that are generally used to indicate that a unit is substandard. In addition to structural deficiencies and standards, which are not enumerated, units lacking complete kitchen or plumbing facilities are considered substandard. These conditions are most often found in older housing and the age of a housing unit is often an indicative of housing conditions. About 43 percent of the housing stock in Turlock was built before 1980 compared with 46 percent of the housing units in the Stanislaus Planning and 57.6 percent of the units in Modesto, as shown on Chart D-10.

Chart D-10: Year Structure Built-Turlock and Stanislaus Urban County



	1939 or earlier	1940 to 1949	1950 to 1959	1960 to 1969	1970 to 1979	1980 to 1989	1990 to 1999	2000 to 2009	2010 to 2013	2014 or later
Turlock	5.70%	3.80%	5.50%	7.80%	20.60%	17.30%	18.20%	20.30%	0.70%	0.10%
Stanislaus Urban County	6.3%	6.5%	9.3%	8.5%	15.3%	14.2%	17.3%	21.5%	1.0%	0.2%

Source: 2012-2016 ACS

Housing is subject to deterioration over time and is typically more apparent in lower-income areas where owners may not have the resources needed to keep up with on-going maintenance or to afford rehabilitation. Other problems associated with older housing include problems associated with materials such as lead paint, asbestos, and some varnishes now known to be hazardous to health. Children under the age of six are at the highest risk for physical and mental damage caused by lead paint. Lead-based paint may be present in any housing unit built prior to 1978, when the federal government banned its use in housing. Any household living in substandard conditions is considered in need of assistance, even if they are not actively seeking alternative housing arrangements. Estimating the number of substandard units can be difficult, but the lack of certain infrastructure and utilities can often be an indicator of substandard conditions.

According to 2022 ACS, as shown in Table D-7, about 0.42 percent of owners lack complete kitchen facilities while approximately 2 percent of renters do. Further, approximately 0.66 percent of owners lack complete plumbing facilities while 0.40 percent of renters do. In total, there are 134 occupied housing units with incomplete plumbing facilities and 283 units with incomplete kitchen facilities. Map D-18 displays where owner-occupied units experience substandard housing, while Map D-19 shows where renter-occupied housing units experience substandard housing. Owner-occupied housing units are more likely to face

substandard housing issues near downtown at Tract 39.04 and northeast Turlock at Tract 39.07, likely due to the age of structures in area. Renter-occupied housing units with the highest percent of units experiencing substandard housing are located in north Turlock around CSU, Stanislaus, as well as directly south of railroad tracks along Golden State Boulevard.

Table D-7 Substandard Housing Issues, 2022

	Owner-Occupied		*Renter-Occupied*	
Housing Type	*Number*	*Percent*	*Number*	*Percent*
Incomplete Kitchen Facilities	57	0.42%	226	2.03%
Incomplete Plumbing Facilities	90	0.66%	44	0.40%
No telephone service available	69	0.51%	89	0.80%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2018-2022), Table B25053, Table B25043, Table B25049

The Stanislaus Urban County and Turlock Consolidated Plan includes violation of State building and housing codes as an additional indication of sub-standard housing conditions and includes criteria for considering substandard units "suitable for rehabilitation." To be eligible for rehabilitation under the Plan, a housing unit must fail to meet one or more of the conditions required for a unit to be in standard condition and the cost of bringing the unit into compliance may not exceed 75 percent of the value of the house and the property. Also eligible are units that have been declared unfit or unsafe for occupancy where the cost of the work is not more than 75 percent of the value.[24] The Action Plan includes a program to continue operation of Turlock's Rehabilitation Loan program, which offers low-interest loans to qualifying low-income owners and non-occupant owners of housing in Turlock rented to qualifying tenants with incomes at 80 percent or less that the County AMI. Loans can be used for repairs to electrical, plumbing, broken windows, foundations, pest control to preserve and upgrade homes. Housing Rehabilitation loans are available to low-income homeowners at 0 percent interest for fully amortized loans and 2 percent for deferred loans and 3 percent for improvements to investor-owned property. The loan amount is determined by the scope of the work to be performed. A deferred payment plan is available for very low-income homeowners.[25]

Turlock has partnered with the We Care Program to renovate existing residential units for low-income families. The project, which is funded through the city's HOME Investment Partnership and the federal Community Development Block Grant program, has completed a four-unit apartment complex and two houses, which are managed by Landlords Property Management, a Turlock-based private company, to provide permanently affordable housing. All housing programs funded by Turlock and Stanislaus County require that units constructed before 1978 be screened and inspected for lead-based paint hazards. Home Consortia projects are usually inspected by the County Housing Authority and County building inspectors inspect any ESG Rapid Re-Housing units. In Turlock, We Care applies the same rules to the units it provides for homeless individuals and households. Contractors bidding on the rehabilitation of homes built prior to 1978 are required to provide documentation of EPA Lead Renovation and Repair and Painting certification. If lead is found in any housing unit, after the work has been completed, a lead-based paint clearance test

[24] Stanislaus Urban County & City of Turlock Consolidated Plan Fiscal Year 2020-2025, pp. 125-129

[25] City of Turlock, Housing Rehabilitation Loan Program https://ci.turlock.ca.us/housingprograms/housingrehabilitationloan/

must be conducted by a licensed contractor with expertise in this type of work. Final payment is not released until the unit has passed the lead-based paint testing requirements.

LARGE FAMILIES

Large families are those households of five or more related individuals. Housing of sufficient size and number of bedrooms is a special need of this group, as appropriate size housing would prevent overcrowding. Cost is an additional important consideration, as many large families especially in California do not have sufficient income to afford larger homes or apartments. Large households make up about 12.6 percent of households in Turlock, which is less than the 17.8 percent of large households in Stanislaus County. Of the large families within Turlock, approximately 17.5 percent are considered extremely low- or very low-income households (i.e., households below 50 percent AMI). About 30.9 percent of large families in Turlock experience some level of cost burden (either regular or severe), while 37.5 percent of all other household types experience cost burden. Large families are more likely to experience cost burden, but less likely to experience severe cost burden compared to all other household types in Turlock.

Turlock Unifies School District (TUSD) Family Resource Center is a hub of support that provides resources, programs, and services based on the needs and interests of families. The Family Resource Center provides programs that support school readiness, hosts parent workshops, links students and families to community assistance, and provides specialized support to foster youth, students experiencing homelessness, and refugees/newcomers. The City of Turlock's Housing Program Services provides sources and assistance to families in the search for housing.

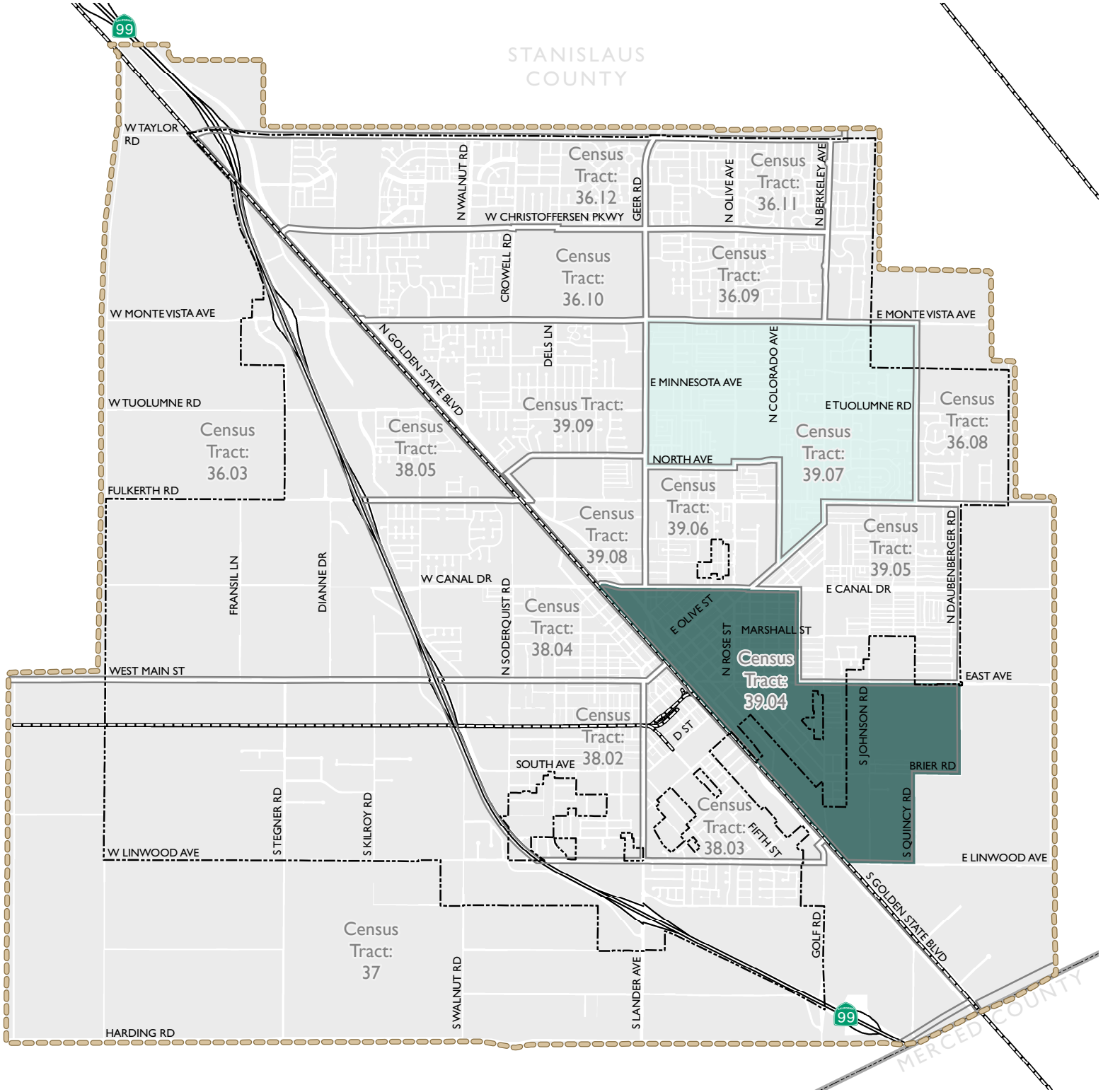
OLDER ADULTS

Older adults in Turlock, especially renters, are more likely than the overall population to be cost burdened. According to the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 20 percent of households with at least one older adult aged 62 and over in Turlock have an income below 30 percent of AMI, higher than the rate of 13.8 percent found among the overall population in Turlock. Older adult households considered very low-income (making between 31 and 50 percent of AMI) are the group most likely to be spending more than 50 percent of their overall household income on housing costs at 44.4 percent. Older adult households who are considered extremely low-income (making less than 30 percent of AMI) are more likely than those considered very low-income to be spending over 50 percent of their income on housing costs at 49 percent. Senior renters are much more likely to fall into the extremely low-income (zero to 30 percent of AMI) or very low-income (31 to 50 percent of AMI) categories than seniors who own their homes (35.9 percent versus 12.1 percent, respectively. As they age, older adults may face additional housing costs to ensure their homes remain accessible and to eliminate threats to health and safety. Like all lower income residents, older adult residents may be facing overpayment problems or are unable to find affordable rental units at all.

Currently, Turlock has 1,252 assisted units specifically reserved for seniors located on 12 different properties, as discussed in Appendix B: Housing Needs Assessment. None of the developments are 100 percent affordable, but eight of the 12 developments accept Section 8 vouchers, which means that up to 1,003 units are potentially available to older adults meeting the income requirements for affordable housing. Senior housing may be most attractive to the oldest cohort (85 years and older), as younger seniors often prefer to continue living independently.

Map D-18

Substandard Housing, Owner Occupied



Two or More Issues, Owner Occupied

- 3.6%
- 3.7% - 4.8%

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

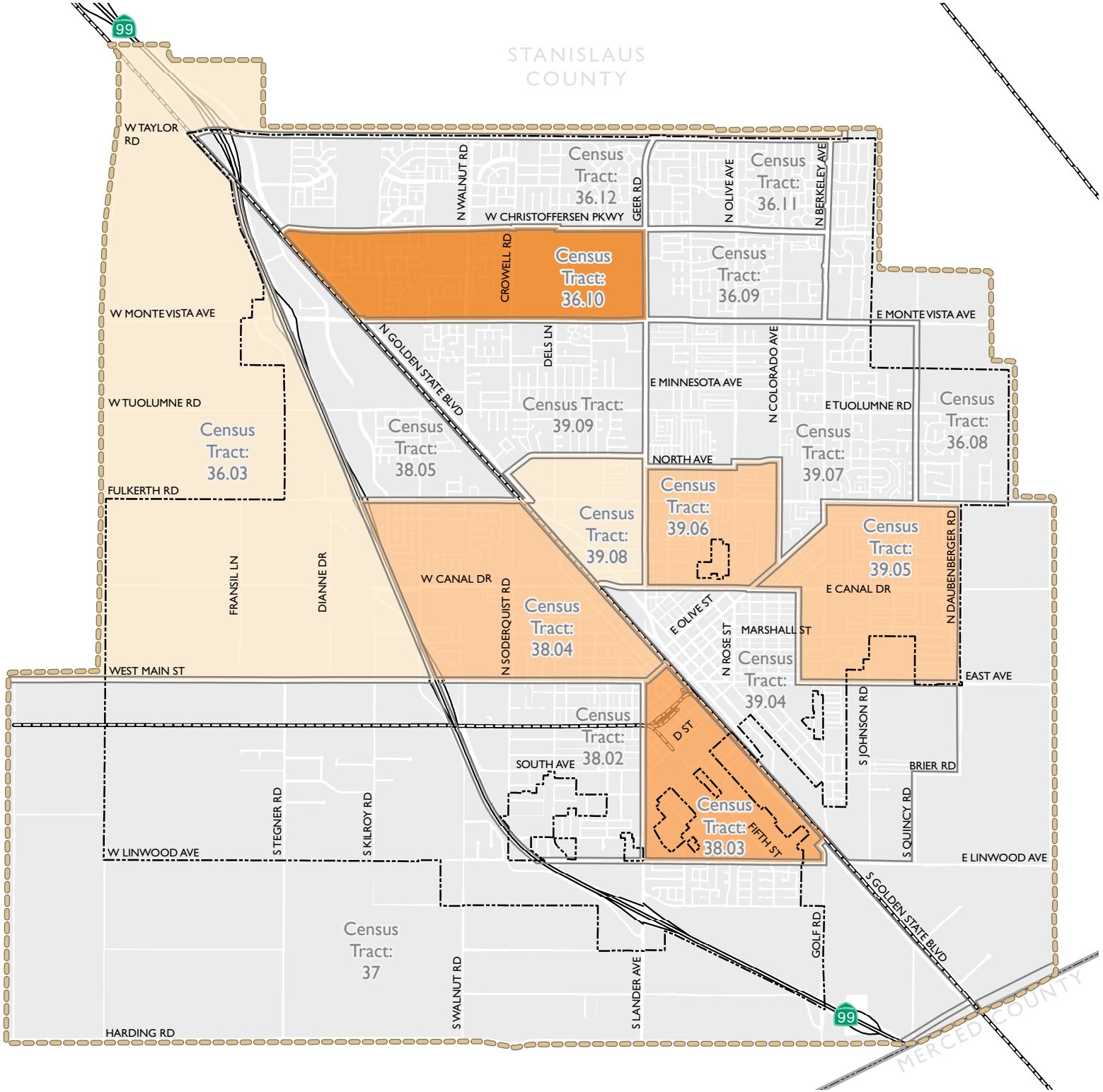
Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: ACS, 2022; City of Turlock, 2021; Dyett & Bhatia, 2024

Map D-19

Substandard Housing, Renter Occupied



Two or More Issues, Renter Occupied

- 2.5% - 3.0%
- 3.1% - 6.0%
- 6.1% - 9.0%
- 9.1% - 14.6%

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: ACS, 2022; City of Turlock, 2021; Dyett & Bhatia, 2024

D.6 Sites Inventory

State law requires a jurisdiction to identify sites to meet its RHNA obligations throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. This includes ensuring that sites are distributed such that they combat housing discrimination, eliminate racial bias, redress historic patterns of segregation, and lift barriers that restrict access. Affirmatively furthering fair housing will help foster inclusive communities so that households at all income levels and of all racial/ethnic makeups can enjoy a more equitable distribution of opportunity and proximity to jobs, transit, a high-quality education, and environmental benefits. To satisfy this requirement, the extent to which buildout of the Sixth Cycle Housing Element inventory may further entrench or help ameliorate existing patterns of segregation and/or exclusion of protected categories was assessed.

ACCESS TO OPPORTUNITY

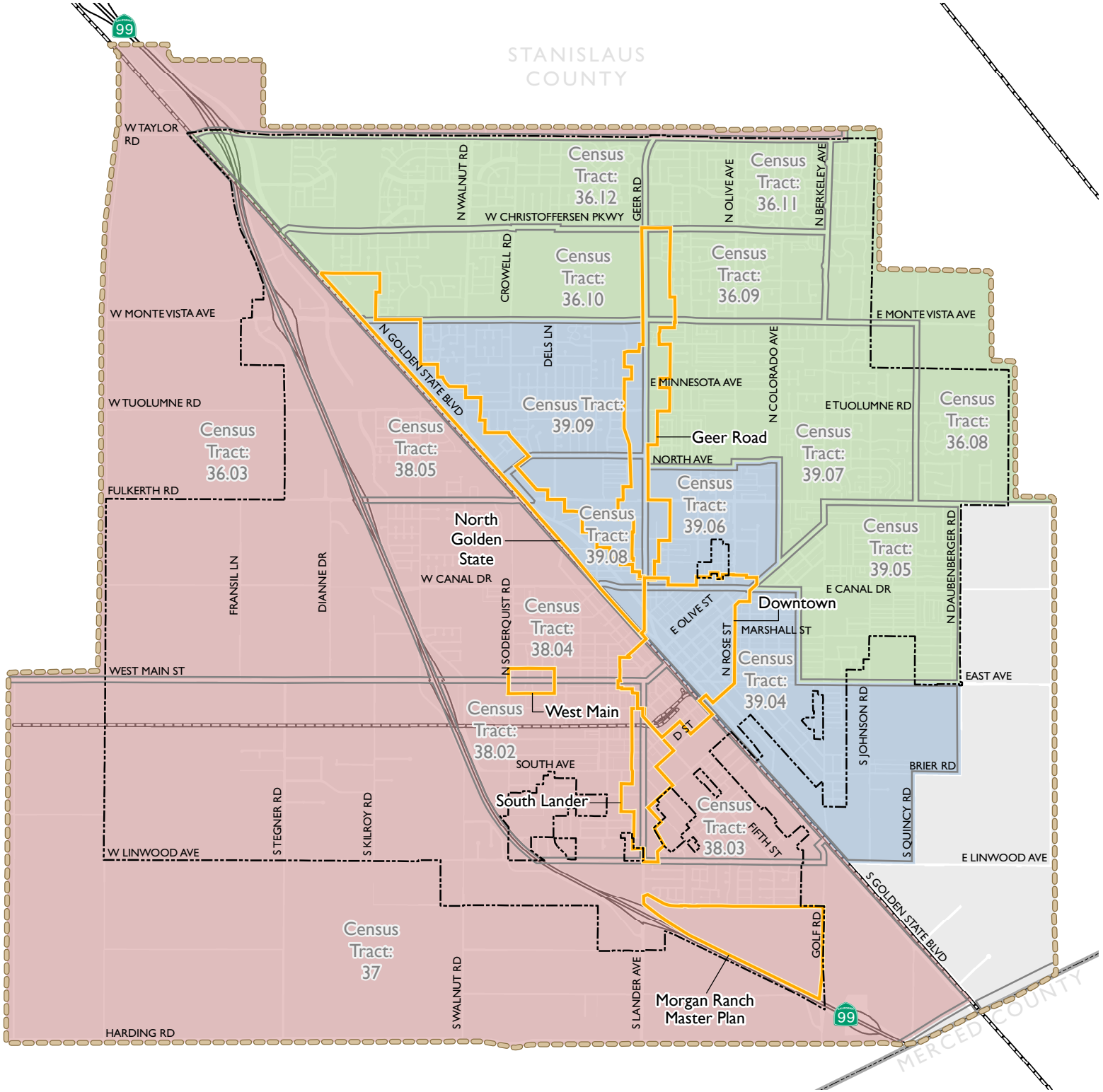
Buildout of the sites inventory will result in creation of new homes for 3,842 low- and moderate-income households, which represents a 20.8 percent increase in the number of LMI households in the City over the planning period. As described above, most of the eastern and northern portions of the city areas are designated as Highest, High, and Moderate Resource on TCAC maps. There are Low Resource and High Segregation & Poverty areas in the center and west of the city. As a result, buildout of the inventory can increase access to educational, economic, and environmental opportunity for disadvantaged and marginalized populations and help to affirmatively further fair housing in the city and in the Stanislaus Region.

Map D-20 shows the City of Turlock divided by areas in order to assess the buildout of the sites inventory. Each area accounts for roughly one third of the City's sites inventory, as outlined in Table D-8, as **Areas 1** and **3** allocate 35 percent of the inventory, respectively, while **Area 2** allocates 30 percent of the inventory. Table D-8 shows the distribution of new housing units **to Areas 1, 2**, and **3** within the planning area, together with relevant socio-demographic data for each area.

Area 1 is the largest geographical area displayed on Map D-20, containing all seven Census tracts southwest of the railroad tracks that dissect Turlock. **Area 1** features the Morgan Ranch Master Plan area, South Lander and West Main opportunity areas, and additional unincorporated Stanislaus County land. The Morgan Ranch Master Plan area envisions the development of a local shopping center, an elementary school, a park, and community facilities, that would increase the access to opportunity for residents. **Area 1** contains relatively more land that meet the criteria established in State law for lower income RHNA sites and demonstrates high potential for development within the planning period. Compared to **Areas 2 and 3**, **Area 1** has a relatively low amount of rent-burdened households in Turlock at 42.8 percent, though the rate of overcrowding is slightly higher, at 5.9 percent. Risk of displacement is low in **Area 1,** though one Tract 38.02 identified as High Segregation and Poverty, is at risk of displacement. Overall, with the development of local-serving shopping and resources, buildout of the inventory would increase assess to opportunity for lower and moderate-income households.

Map D-20

Sites Inventory Analysis



- Opportunity Area
- Area 1
- Area 2
- Area 3

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

Map Date: 9/20/2024

0 ¼ ½ 1 Miles

Source: City of Turlock, 2021; Dyett & Bhatia, 2024

Area 2 on Map D-20 captures four Census tracts in the center of Turlock among the Golden State Boulevard and Geer Road opportunity areas and commercial corridors. **Area 2** is served by five Turlock Transit routes that all connect to the Turlock Transit Center, offering local and regional connection to nearby cities of Modesto and Ceres. Overall, **Area 2** accommodates 30 percent of the sites inventory and about 53.6 percent of lower income units, as it contains more land that meets the criteria established in State law for lower income RHNA sites due to the proximity to shops, services, transit, and jobs located in downtown Turlock. However, compared to **Areas 1** and **3**, **Area 2** has a higher percentage of rent-burdened households and HCV use.

Area 3 features northern and eastern portions of Turlock, which includes large vacant residential land that presents important opportunities to accommodate housing to serve local need. The integration of mixed-income housing is envisioned under buildout of the inventory, which will diversify the range of housing types in the area by adding multifamily housing near CSU, Stanislaus for students, and for-sale product for those in need. All of the tracts within this area are either Highest, High, or Moderate Resource, demonstrating excellent access to educational, economic, and environmental opportunity for populations residing within or around these tracts.

Overall, buildout of the inventory would increase access to opportunity for lower and moderate income households in RCAAs and throughout the planning area. While it would concentrate a large share of lower income housing in **Area 1** and **2**, buildout foresees the development of additional services and resources to compliment the growth, thus furthering access to opportunity for all income categories. Further, **Area 3**, specifically **Tracts 36.09 and 36.10,** envision the integration of mixed-income housing and a diversity of housing types, which would suit a variety of Turlock's residents in these Highest/High Resource area. Therefore, buildout of the inventory would have a beneficial effect on access to opportunity in in the city and the Stanislaus Region.

SEGREGATION AND INTEGRATION

Map D-1 indicates that many areas of the City of Turlock are relatively racially and ethnically integrated, and that the City is less segregated than the County as a whole. There are five R/ECAPs in the central part of Stanislaus County, where Turlock, Modesto, and Ceres, the three most populous cities in the county are located. None of these R/ECAPS are in Turlock but one census tract (**Tract 38.02 in Area 1**) in Turlock does meet the Tax Credit Allocation Committee/HCD criteria as a High Segregation and Poverty (HSP) tract (Map D-8). Map D-8 shows the locations of RCAAs; within Turlock, two RCAAs are located along the very eastern edge of the city and outside the city to the east (**Tracts 36.08** and **39.05 in Area 3**).

Throughout buildout of the inventory and implementation of Programs 1-B Workforce Housing Overlay and 1-G Congregational Overlay, the City will integrate mixed income throughout **Area 1** and **2**, specifically in **Tract 38.02,** to ensure units will be affordable to moderate and lower income households. Additionally, implementation of Programs 1-E, 1-F, and 6-C will incentivize and promote the creation of affordable ADUs and JADUs by initiating awareness of options and benefits for homeowners seeking to develop ADUs, creating pre-approved ADU plans, and monitoring ADU and JADU trends, specifically targeted at developing in RCAAs. Further, the implementation of Program 5-A, 5-B, 5-C, and 5-D will enforce fair housing laws and address discrimination in the building, financing, selling, and renting of housing based on race, family status, national origin, and work to integrate all households, regardless of ethnicity, race, family composition, and source of income , into the housing cloth of Turlock. Therefore, overall buildout of the inventory would have a beneficial effect on the prevailing pattern of concentrated affluence in Stanislaus County and would not exacerbate patterns of segregation.

DISPROPORTIONATE NEEDS AND DISPLACEMENT RISK

While only three tracts (**Tract 38.02** in **Area 1, Tracts 39.06, and 39.08** in **Area 2**) in the city are considered at risk of displacement, cost burden is widely prevalent in Turlock. Cost burden is a major issue for older adults, students, and low-income households in Turlock, and is more evenly distributed by race and ethnicity than by location (Map D-14 and D-15 and Charts D-6 and D-7). Notably, between 60 and 80 percent of homeowners in **Tract 36.03** in **Area 1** immediately west of Turlock are cost burdened, while 60 to 80 percent of renters in **Tracts 39.06, 39.08**, and **39.09** in **Area 2** in the heart of Turlock are cost burdened.

Buildout of the inventory focuses housing development in tracts that have lower displacement risk and lower percent of overcrowded households, particularly in the northern and southern portion of Turlock (**Tracts 36.09 36.10** in **Area 2, and Tract 37** in **Area 1**). However, the inventory also accommodates about 10 percent of units within **Tract 39.08** in **Area 2** that has higher rates of overcrowding and risk of displacement. Buildout of inventory would focus additional below market rate housing throughout **Area 2**, which would alleviate displacement pressure and relieve overcrowding. Overall, buildout of the inventory would have a beneficial effect on cost burden, overcrowding and displacement risk in Turlock.

Table D-8: AFFH Housing Element Sites Analysis

Area	*Area 1*	*Area 2*	*Area 3*
Projected Capacity			
Lower Income Units	758	1458	506
Moderate Income Units	229	106	785
Above Moderate-Income Units	1312	406	1031
Socio-Demographic Characteristics (2022 5-Year ACS Estimates)			
Existing Households	8680	7084	13116
Non-White Population	47.48%	40.10%	35.63%
Low to Mod. Income Households	4982	4566	5124
Rent Burdened Households	42.18%	59.83%	44.31%
Overcrowded Households	5.93%	4.60%	4.19%
HCV Use	2.78%	14.70%	5.43%
Displacement Risk	Lower Displacement Risk	At Risk of Displacement	Lower Displacement Risk
Percent of Lower Income Units	27.8%	53.6%	18.6%
Percent Increase in Lower Income Units	15.2%	31.9%	9.9%
Percent of Total Units Allocate in Area	34.9%	29.9%	35.2%

D.7 Summary and Conclusions

State law requires that jurisdictions identify fair housing issues as well as contributing factors and priority levels for each factor. Further, a jurisdiction must identify specific goals and actions it will take to reduce the severity of fair housing issues within that jurisdiction. This section fulfills these requirements based on the assessment provided above, as well as relevant information from the 202-2025 AI. Goals and actions related to AFFH are incorporated into the broader Housing Action Plan contained within Chapter 4 of this Housing Element.

The most significant fair housing issues in Turlock relate to housing cost burden, overcrowding, and segregation by income level. Although Turlock is a majority-minority community, the census tracts with the greatest share of non-White Hispanic or Latino residents are also the ones experiencing the highest poverty rates, environmental burdens, and displacement risks. There is also some evidence of racial/ethnic discrimination in lending services, as well as geographic concentrations based on familial status.

Based on the findings of this assessment, Table D-9 presents a summary of existing fair issues and their contributing factors, as well as a description for each. Issues that are primarily related to environmental justice or economic development and do not have a direct bearing on fair housing are ranked as low or not included. Priority levels were assigned as follows:

- **High** – Designates contributing factors that limit or deny fair housing choice (i.e., has the potential to violate the Fair Housing Act).
- **Medium** – Designates contributing factors which should be addressed in the near term. These issues do not violate the Fair Housing Act but may increase fair housing issues in the city. These factors may be beyond the City's immediate capabilities to address.
- **Low** – Designates contributing factors that either do not need to be or cannot be addressed immediately by the city but should be addressed later on during the eight-year planning period.

Table D-9: Fair Housing Issues and Contributing Factors

Priority Level	*Fair Housing Issue*	*Description*	*Contributing Factor(s)*	*Meaningful Actions*	*Geographic Targeting*	*2023-2031 Metrics and Timing*
High	Enforcement	Surveys indicate that tenants' rights education is among the services needed most in Stanislaus County. In Turlock, linguistically isolated households where adults have difficulty speaking English tend also to be concentrated in areas with the highest rates of renters, rent burdened households, and low/moderate income residents who may be at greater risk of eviction or have greater need for landlord-tenant mediation services.	• Lack of awareness of tenant rights • Linguistic isolation	• Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 5-C Anti-Discrimination Training	Citywide and in DACs	• Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Assist 30 households during the planning period (Program 5-B) • Increase awareness of fair housing practices among small, independent real estate professionals and lenders over the planning period (Program 5-C)
Medium	Enforcement	Loan denial rates are 7-10 percent higher for people of color than for White applicants. Between 2018-21, Black applicants had the highest loan denial rates, followed by Hispanic or Latino applicants. White applicants consistently experienced lower than average loan denial rates.	• Financial literacy of affected groups • Lending discrimination	• Program 5-A Fair Housing Information • Program 5-C Anti-Discrimination Training	Citywide	• Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Increase awareness of fair housing practices among lenders over the planning period (Program 5-C) • Percent change in denial rates
High	Enforcement	Fair housing complaints disproportionately involve small, independent landlords who represent a large share of rental property owners. Disability was the primary basis for fair housing complaints in Turlock between 2014 and 2019, accounting for more than 70 percent of all complaints. Race and familial status each accounted for approximately 12 percent of complaints.	• Lack of training/awareness of fair housing law • Lack of awareness of tenant rights	• Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 5-C Anti-Discrimination Training • Program 4-B Support for Individuals with Disabilities	Citywide	• Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Assist 30 households during the planning period (Program 5-B) • Increase awareness of fair housing practices among small, independent real estate professionals and lenders over the planning period (Program 5-C) • Increase in participation in DRAIL programs and services by Turlock residents (Program 4-B)
High	Segregation and Integration	There is a discernable pattern of segregation by income and race in Turlock. Neighborhoods in the north and east have higher incomes and higher a higher share of White households, while neighborhoods in the center and southwest have lower incomes and a higher share of non-White residents.	• Historical settlement patterns in Turlock • Neighborhoods in the north and east are predominantly comprised of single-family housing, often not affordable for disadvantaged groups.	<u>Expand housing choice and housing mobility in north and east of Turlock</u> • Program 1-E ADU/JADU Awareness • Program 1-F Pre-Approved ADU Plans • Program 1-G Congregational Overlay • Program 1-C SB9 Ordinance • Program 1-D Small Lot Subdivision Ordinance • Program 5-D Disavowal of Racially Restrictive Covenants <u>Prevent Displacement of Existing LMI Households</u> • Program 1-B Workforce Housing Overlay • Program 5-A Fair Housing Information	Center and southwest Turlock	<u>Expand housing choice and housing mobility in north and east of Turlock</u> • Issue 15 ADU/JADU construction permits annually over the planning period (Program 1-E) • Construction of 10 new ADU/JADUs in Turlock annually over the planning period (Program 1-F) Adopt the overlay by Q4 2026; increase the supply of affordable housing in Turlock, with a focus on High and Highest Resource neighborhoods (Program 1-G) • Adopt the SB 9 Ordinance by Q1 2026; conduct community outreach bi-annually following adoption of the ordinance, with annual progress reporting to HCD through APRs (Program 1-C) • Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock (Program 1-D)

Table D-9: Fair Housing Issues and Contributing Factors

Priority Level	*Fair Housing Issue*	*Description*	*Contributing Factor(s)*	*Meaningful Actions*	*Geographic Targeting*	*2023-2031 Metrics and Timing*
				• Program 5-B Mediation and Enforcement • Program 3-H Anti-Displacement Strategy • Program 6-D Development and Replacement Unit		• Post information to City website and send e-newsletter by end of Q3 2025; annually each year of the planning period thereafter, Participation of 100 homeowners in County program by 2031 (Program 5-D) <u>Prevent Displacement of Existing LMI Households</u> • Adopt the Workforce Housing Overlay by January 31, 2025; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B) • Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Assist 30 households during the planning period (Program 5-B) • Prepare anti-displacement strategy by end of Q4 2025, being implementation in Q1 2026; minimize or prevent displacement of at-risk residents (Program 3-H) • Beginning in Q4 2024; protection of existing housing (Program 6-D)
High	Segregation and Integration	LMI households are concentrated in Low and Moderate Resource Areas north and west of downtown. More than 20 percent of households in these areas are headed by a single mother with children, which represents an over concentration. One of these tracts (38.02) is designated as an area of High Poverty and Segregation by the State and has the highest rate of overcrowding in Turlock.	• Historical settlement patterns • Lack of housing options for LMI households in High Resource areas • Income and educational attainment levels	• Program 1-E ADU/JADU Awareness • Program 1-G Congregational Overlay • Program 1-C SB9 Ordinance • Program 1-D Small Lot Subdivision Ordinance	DACs with more than 50% LMI households (tracts 38.02; 38.03; 38.04; 39.04; 39.08)	• Issue 15 ADU/JADU construction permits annually over the planning period (Program 1-E) • Adopt the overlay by Q4 2026; increase the supply of affordable housing in Turlock, with a focus on High and Highest Resource neighborhoods (Program 1-G) • Adopt the SB 9 Ordinance by Q1 2026; conduct community outreach bi-annually following adoption of the ordinance, with annual progress reporting to HCD through APRs (Program 1-C) • Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock (Program 1-D)
High	Access to Opportunity	About 85 percent of the students served in western tracts are economically disadvantaged, meaning their families are below the poverty line, and 76 percent are minority. Students of color in Turlock received lower test scores in both math and English than non-Hispanic White students. The proportion of students who meet or exceed standards in English Language Arts or math in Turlock is higher than in Stanislaus County, but lower than in the State.	• Income and educational attainment levels • Lower performance scores	<u>Enhance Income and Educational Attainment</u> • Workforce Development Initiates (Program 5-F) <u>Raise Performance Scores</u> • Chatom Union School District (CUSD)'s instructional support programs that include homework support and academic intervention including math and reading • TUSD's Family Resource Center provides resources, programs, and services to diverse Turlock families, that include school readiness programs for students in need	Citywide; southwest Turlock	• Post materials by end of Q3 2025, updating periodically throughout the planning period; coordinate annually with SCWD and non-profit partners to track participation rates (Program 5-F) • Higher performance scores in English and Mathematics throughout Turlock during the planning period
High	Access to Opportunity	Census tracts west of the BNSF railroad tracks have environmental opportunity scores than rank among the worst 25 percent statewide. These areas also have higher shares	• Historical settlement patterns • Exposure to air pollution and DPM • Lower tree canopy coverage	• Program 3-A Home Rehabilitation Loan Program • Program 3-B Acquisition and Rehabilitation of Property for Affordable Housing	DACs west of the BNSF tracks	• Provide 10 loans annually throughout the planning period (Program 3-A) • Provide 14 loans annually throughout the planning period (Program 3-B)

Table D-9: Fair Housing Issues and Contributing Factors

Priority Level	*Fair Housing Issue*	*Description*	*Contributing Factor(s)*	*Meaningful Actions*	*Geographic Targeting*	*2023-2031 Metrics and Timing*
		of low income and non-White households than the rest of Turlock. A primary cause of the low environmental opportunity scores is Exposure to air pollution and diesel particulate matter (DPM), which can disproportionately affect low income residents who may live in lesser quality housing with inadequate insulation and ventilation; have less access to quality healthcare (or be uninsured); and not be able to afford to live in other neighborhoods.	• Access to healthcare and health insurance coverage	• Program 3-C Neighborhood Clean Up Programs • Program 3-E Place-Based Community Improvement Efforts		• Operation of various projects; throughout the 2023-2031 planning period (Program 3-C) • Completion of construction of the Columbia Pool, pavement and rehabilitation of various street segments, and re-surfacing and re-striping of the multi-purpose court at Columbia Park; completion of construction by end of Q4 2027 (Program 3-E)
High	Displacement	Three tracts in Turlock have elevated risk of displacement (38.02, 39.06, and 39.08). All have among the highest shares of renters, low-income households, and non-White residents. Two are DACs and one is classified as High Poverty and Segregation.	▪ Turlock home values have increased by 124 percent since 2011, with value of smaller units (1 and 2-bedrooms) seeing the steepest increases, indicating need for smaller units	• Program 1-B Workforce Housing Overlay • Program 3-A Home Rehabilitation Loan Program • Program 3-B Acquisition and Rehabilitation of Property for Affordable Housing • Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 3-H Anti-Displacement Strategy • Program 6-D Development and Replacement Unit Requirements	DACs with elevated risk of displacement (Tracts 38.02, 39.06, and 39.08)	• Adopt the Workforce Housing Overlay by January 31, 2025; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B) • Provide 10 loans annually throughout the planning period (Program 3-A) • Provide 14 loans annually throughout the planning period (Program 3-B) • Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Assist 30 households during the planning period (Program 5-B) • Prepare anti-displacement strategy by end of Q4 2025, being implementation in Q1 2026; minimize or prevent displacement of at-risk residents (Program 3-H) • Beginning in Q4 2024; protection of existing housing (Program 6-D)
High	Disproportionate Needs	<u>Cost Burden</u> Renters are disproportionately affected by housing cost burden: more than 50 percent of renters in Turlock devote more than 30 percent of their income to housing costs, putting them at risk of falling behind on rent and facing eviction. Tract 38.02, designated as High Poverty and Segregation, has the highest rate of cost burdened homeowners.	▪ Turlock home values have increased by 124 percent since 2011, with value of smaller units (1 and 2-bedrooms) seeing the steepest increases, indicating need for smaller units	• Program 1-B Workforce Housing Overlay • Program 1-C SB9 Ordinance • Program 1-D Small Lot Subdivision Ordinance • Program 1-E ADU/JADU Awareness • Program 1-F Pre-Approved ADU Plans • Program 1-G Congregational Overlay • Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 3-H Anti-Displacement Strategy • Program 6-D Development and Replacement Unit Requirements	Citywide	• Adopt the Workforce Housing Overlay by January 31, 2025; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B) • Adopt the SB 9 Ordinance by Q1 2026; conduct community outreach bi-annually following adoption of the ordinance, with annual progress reporting to HCD through APRs (Program 1-C) • Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock (Program 1-D) • Issue 15 ADU/JADU construction permits annually over the planning period (Program 1-E) • Construction of 10 new ADU/JADUs in Turlock annually over the planning period (Program 1-F) • Adopt the overlay by Q4 2026; increase the supply of affordable housing in Turlock, with a focus on High and Highest Resource neighborhoods (Program 1-G) • Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)

Table D-9: Fair Housing Issues and Contributing Factors

Priority Level	*Fair Housing Issue*	*Description*	*Contributing Factor(s)*	*Meaningful Actions*	*Geographic Targeting*	*2023-2031 Metrics and Timing*
						• Assist 30 households during the planning period (Program 5-B) • Prepare anti-displacement strategy by end of Q4 2025, being implementation in Q1 2026; minimize or prevent displacement of at-risk residents (Program 3-H) • Beginning in Q4 2024; protection of existing housing (Program 6-D)