

San Joaquin County – HCD Findings Letter 2, November 12, 2024

Letter Finding	Page Addressed
Affirmatively Furthering Fair Housing	
Racial/Ethnic Areas of Concentration of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAAs): While the element includes general discussion about R/ECAP and RCAA, it should specifically analyze R/ECAP areas including patterns and changes over time, comparisons to other neighborhoods in terms of quality of life (e.g., infrastructure, housing and neighborhood conditions) and incorporate local data and knowledge and other relevant factors (see below).	Starting p. 7-70
Disproportionate Housing Needs Including Displacement Risks: The element includes some general information on persons experiencing homelessness and generally explains patterns of need and available resources but should also discuss how those resources are connected to areas or patterns of need, Based on a complete analysis, the element should add or modify program to geographically target resources and strategies.	Program 3-1 (Starting p. 7-273) p. 7-132
Contributing Factors to Fair Housing Conditions: The element should re-assess and prioritize contributing factors upon completion of analysis and make revisions as appropriate.	N/A
Goals Priorities, Actions, and Milestones.	
Based on the outcomes of a complete analysis, the element should add or modify Programs to affirmatively further fair housing (AFFH). Program action must have specific commitment, milestones, geographic targeting, and metrics or numeric objectives to overcome AFFH contributing factors. Further, the element should add place-based strategies toward community revitalization and programs should also geographically target areas of highest median income and racially concentrated areas of affluence and areas of high segregation and poverty.	N/A
<i>Program 2.1 (Support Affordable Housing Development):</i> According to HUD CHAS data, 16.7 percent of County households overpay for housing. This program should increase metrics to assist more than ten cost-burdened households during the planning period.	p. 7-264
<i>Program 2.2 (Manufacture Mobile Monitoring):</i> The program should add alternative action if a community land trust is infeasible.	p. 7-265
<i>Program 2.8 (Extremely Low-Income Housing):</i> The program should add geographic targeting, preferably in areas of higher-median income, resource or affluence.	p. 7-269

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<i>Program 2.11 (Home Sharing Program)</i> : The program should add geographical targeting for a portion of its numerical objectives, including in areas of higher-median income, resource or affluence and add alternative action if a home-sharing program is considered infeasible.	p. 7-270
<i>Program 3.6 (Persons with Disabilities and Developmental Disabilities)</i> : The program should increase the number of units that will have accessibility features throughout the planning period.	p. 7-279
<i>Program 3.8 (Housing Choice Vouchers (HCV))</i> : The program should aim to expand HCVs in areas of higher-median income, opportunity, or affluence.	p. 7-282
Lastly, programs under 7.11 (<i>Neighborhood Preservation</i>) should be revised to include geographic targeting in areas of higher segregation and concentrated poverty.	Program 4-2 (p. 7-283) Program 4-3 (p. 7-283) Program 4-4 (p. 7-284)
In addition, program 4.5 (<i>Place-Based Revitalization</i>) should include an action that prioritizes developing a long-term community development strategy and/or program for lower-resourced or lower median-income areas in the County. This strategy will help mitigate displacement and provide community revitalization in areas of need.	p. 7-285
In addition, Program 2-12 (Water and Wastewater Service) should proactively coordinate with service providers in addition to developers and proactively apply for funding with discrete timelines (e.g., at least annually).	p. 7-271
Sites Inventory	
The element must demonstrate sufficient existing or planned water, and sewer capacity to accommodate the County’s regional housing need, including adding appropriate programs with specific commitment and discrete timelines to address identified barriers or needed improvements. While the element now includes information related to infrastructure capacity relative to planned residential capacity, in some cases, the element states information was not available. As part of future submittals, the County should continue to gather information to complete the analysis and based on the outcomes of that analysis, add or modify programs as appropriate.	Program 2-12 (p. 271) p.7-226 to 7-229
Constraints	
As noted in the prior review, the element should analyze parking standards for multifamily housing, particularly for smaller bedroom types (e.g., studio and one-bedroom). The analysis should address impacts on housing cost and supply. Based on a complete analysis, the element may need to add or modify programs to address any actual or potential constraints on development.	p. 7-191 and Program 3-5 (p. 7-278)