bae urban economics

Analysis of Impediments to Fair Housing Choice

Prepared for the County of San Joaquin

October 15, 2020

bae urban economics

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Raymond Hoo
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Dear Mr. Hoo and Mr. Becerra:

We are pleased to present the enclosed Analysis of Impediments to Fair Housing Choice (AI) for the San Joaquin Urban County to accompany the 2020-2025 Consolidated Plan.

Under current HUD regulations (Title 24, Part 91), jurisdictions that participate in HUD's entitlement programs, including Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and the HOME Investment Partnerships Program, are required to prepare a Consolidated Plan (Con Plan) that guides the use of federal entitlement funding during each five-year planning cycle. As part of the Con Plan, participating jurisdictions are required to self-certify that they are doing everything reasonably within their power to affirmatively further fair housing. To provide support for this certification, each recipient is required to document impediments to fair housing choice within their jurisdictions. This AI addresses this requirement for San Joaquin County. Subsequently, each jurisdiction is required to maintain records verifying that the fair housing analysis was prepared and to document what actions were taken in response.

It has been a pleasure working with you and your staff on this important project. If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Aaron Nousaine

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Associate Principal

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EXECUTIVE SUMMARY

OVERVIEW

The purpose of the Analysis of Impediments to Fair Housing Choice (AI) is broad, and includes analysis of public and private policies, practices, and procedures that influence housing choice within a jurisdiction. The AI serves as the logical basis for fair housing planning and coordination and is required by the U.S. Department of Housing and Urban Development (HUD) as part of the consolidated planning requirement associated with participation in the Community Planning and Development (CPD) formula programs, which most commonly include the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and the HOME Investment Partnership (HOME). Preparation of an AI also provides essential information to policy makers, planning staff, housing providers, lending institutions, and fair housing advocates. Stakeholders can then use this information to address impediments to fair housing and the information can help to build support for both public and private sector fair housing initiatives.

What Is An Impediment to Fair Housing Choice?

While there are many factors in the public and private domains that have the potential to prevent or delay equal access to housing, HUD defines impediments to fair housing choice as:

1) Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice;

2) Any actions, omissions, or decisions that have this effect.

An evaluation of potential impediments to fair housing choice must also distinguish between access to housing based on cost and affordability, versus access to housing based on illegal discrimination. Affordability, by itself, is not a fair housing issue. When a household has problems accessing housing due to cost alone, no fair housing law is violated. However, when affordability disproportionately impacts protected classes, additional analysis is necessary to identify whether impediments to fair housing exist, and whether or not illegal discrimination has occurred.

The San Joaquin Urban County[1] accounts for nearly 64 percent of the County's growth overall since 2010. Unincorporated parts of the County account for approximately 26 percent of all Urban County growth since 2010. The Urban County's growth rate not only outpaces the County's growth overall, but statewide growth as well. As of 2020, the Urban County

[1] The San Joaquin Urban County is defined as the unincorporated parts of San Joaquin County and the cities of Tracy, Manteca, Lathrop, Ripon, and Escalon.

represents 50 percent of the County's population. On the other hand, trends in the age of the Urban County population have been comparable to trends in the State, reflecting a similar median age between 35 and 36 years, and an overall increase in the median age since 2010. One notable exception is the share of residents aged 18 to 24 years, which grew much more rapidly in the Urban County compared to the State of California, at 9.3 percent compared to 1.7 percent. Like the state, Urban County households had become larger by 2018 but were not accompanied by significant growth in the under-18 population. This suggests that the increase in average household size may be attributed to additional adults joining or re-joining family households.

Just over 60 percent of the Urban County population are members of a minority group as of 2018, which is somewhat lower than the statewide figure. However, the minority population in the Urban County is growing much more quickly than the population as a whole, which is narrowing the gap between the county and the state. Hispanic and Latino residents made up the largest minority subpopulation within the Urban County in 2018, representing over 41 percent of residents, which is up from 37.5 percent in 2010. The two next largest minority subpopulations are Asian and African American residents.

Outside of Stockton and Lodi, which are not in the Urban County, there are notable clusters of Block Groups located along State Highways 4 and 28 where more than 70 percent of the population is Hispanic or Latino. There are also similar concentrations of Hispanic and Latino residents in French Camp and in the unincorporated area to the west of Lodi. Indeed, the isolation index shows relatively high levels of segregation for Hispanic and Latino residents compared to other minority groups, and an isolation score that is comparable to Non-Hispanic White residents. The areas with concentrations of minority residents also correspond somewhat with concentrations of lower-income households, although there are not racially and ethnically concentrated areas of poverty (also known as RCAPs and ECAPs) in the Urban County.

Employment projections show that by 2025, the Urban County is expected to have fewer jobs than the city of Stockton, which is projected to contain nearly 48 percent of all jobs in the County. And, despite the significant population growth in unincorporated parts of the County, these areas are also projected to add the fewest jobs by 2025, growing by a projected average annual rate of 0.6 percent. There is also relatively limited connectivity to transit options in unincorporated parts of the County.

The background analysis also identified a variety of special needs populations that may require special consideration with regard to fair housing issues. These generally include seniors, persons with disabilities, large households, farmworkers, homeless persons, and persons diagnosed with AIDS and related diseases, among other populations at-risk for special housing discrimination.

HOUSING CHARACTERISTICS AND CONDITION

Like most Central Valley communities, the housing stock in the Urban County is skewed toward lower-density single-family housing units, which have increased overall as a share of housing units since 2010, in contrast to statewide trends towards denser development. Nearly three-quarters of the housing stock has three or more bedrooms, although more large units are owner-occupied than renter-occupied. This is despite the significant demand for larger rental units, as 54.5 percent of all rentals have three or more bedrooms. The prevalence of large rental units may also suggest that there is an insufficient number of smaller units, which may present a barrier to fair housing choice. Notably, the share of units constructed after 2010 in the San Joaquin Urban County is 5.2 percent, compared to 2.7 percent statewide, which suggests the Urban County's housing market has been relatively strong since the financial crisis compared to the state overall.

The most recent housing conditions survey conducted by San Joaquin County was in 2004, so the data may not reflect the housing conditions in the County today. Nonetheless, of the 107 residential code enforcement cases on 83 unique parcels opened between September 18, 2018 and June 9, 2020, 64 percent resulted in deeming the structure unsafe to occupy. This is generally as a result of dilapidation and improper maintenance. Most of the code enforcement cases in the unincorporated areas were adjacent to urban centers, and particularly the city of Stockton.

The Housing Authority of the County of San Joaquin (HACSJ) operates some public housing complexes in the Urban County, although the majority of the County's properties are in Stockton. Urban County public housing projects include Buthmann Homes in Tracy and Mokelumne Manor in Thornton, and three farm labor housing centers in French Camp and Thornton. Affordable housing projects not operated by HACSJ account for 1,234 units in the Urban County, and the majority of these are in Manteca and Tracy. HACSJ also administers the Housing Choice Voucher (HCV) program in San Joaquin County. Consultations with HACSJ and other housing and supportive service providers indicate that many HCV holders struggle to find rental units that are priced within the Fair Market Rent (FMR) limits set by the HCV program and that some landlords are reluctant to accept HCV's, and as a result, many HCVs remain unutilized. HACSJ staff indicate that approximately 40 percent of HCV holders are successful in finding a home where they can use their HCV. Additional data provided by the HACSJ in October 2019 indicate that at that time only 78 percent of the HCVs issued at that time were being utilized. These findings suggest a need to educate rental property owners and managers of the requirements of newly enacted SB 329, which prohibits discrimination against tenants who use HCVs and other forms of housing assistance.

PUBLIC AND PRIVATE SECTOR IMPEDIMENTS

Zoning ordinances throughout the Urban County jurisdictions contain enough high-density designations to generate low- to moderate-income housing units as determined by the Regional Housing Needs Allocation (RHNA) mandated by the State of California. Furthermore,

all of the Urban County jurisdictions will be required by State law to complete updated Housing Elements in 2023, which will require all jurisdictions to evaluate their zoning ordinances and other policies to identify impediments to the development of housing and identify sites for residential development affordable at all income levels, and take reasonable steps toward addressing impediments. However, there are potentially impediments to the development of second units in Tracy and Lathrop, where some single-family zones do not officially allow for the development of second units, which is required by State law. Additionally, neither San Joaquin County nor the City of Ripon have updated their definition of family to include non-blood relatives and end restrictions on family size included in their zoning codes. This is also required by State law and was in fact recommended to both jurisdictions in the previous Analysis of Impediments to Fair Housing for the Urban County.

Private sector impediments to fair housing choice include discrimination in lending practices. The rate of loans per 1,000 units varies widely in the unincorporated parts of the County, although on average, lending rates are lower in unincorporated areas compared to the cities in the Urban County. Although conventional loan applications were approved at rates higher than representation of racial subgroups in the overall population, Non-Hispanic White residents were approved for loans at the highest rate. Hispanic and Latino residents were approved for loans at a higher rate than Black/African American residents. Although approval rates were relatively consistent with rates of representation in the overall population for different minority groups, Hispanic and Latino residents accounted for only 28.6 percent of loan applications, despite comprising 41.1 percent of the population. Finally, moderate-income households apply for government-insured loans at the highest rate among all income groups, which suggests that in the Urban County, moderate-income households may struggle to purchase a home with conventional loans.

Assessment of Fair Housing Services

Complaints alleging housing discrimination can be filed with either the state or federal government. Federal housing complaints are filed with the HUD Office of Fair Housing and Equal Employment Opportunity (FHEO), while state housing complaints are filed with the California Department of Fair Employment and Housing (DFEH). Overall, there are relatively few fair housing complaints filed within the Urban County. Between 2015 and 2020 (YTD), there were 23 complaints with DFEH and 43 reports of discriminatory practices. Nearly 85 percent of all complaints were resolved because of insufficient evidence or because no cause was determined. This may be evidence of relatively low rates of discrimination, but also of insufficient reporting and enforcement.

San Joaquin Fair Housing Association (SJFH) also formally files cases based on fair housing complaints. Similarly, the number of cases formally opened by SJFH has also decreased overall since 2017, from 48 cases to 33 cases in 2019. However, by contrast, the number of direct services provided to families, such as outreach and education, increased significantly over the same time frame. The increase in the number of individuals receiving services and

the decrease in the number of cases is likely due in part to the ongoing COVID-19 pandemic, which has caused many households to experience significant financial hardship but also led to a temporary statewide moratorium on evictions. In addition, SJFH experienced an increase in calls from both tenants and landlords following the passage of AB 1482, which instituted caps on rent increases and just cause eviction protections for many rental units throughout California.

RECOMMENDED ACTIONS

The following are actions recommended to address fair housing issues within the San Joaquin Urban County during the 2020-2025 planning period.

Access to Information

Action 1: The County and each participating jurisdiction will provide links through their websites to housing services and resources, fair housing, and consumer information on housing choices. The County and each participating jurisdiction will make available such information at local service centers and City/County offices, public libraries, and other public facilities.

Action 2: The County and each participating jurisdiction will provide education on fair housing to County and City staff members who administer and oversee housing programs and code enforcement activities so that they can respond to phone calls from the public about fair housing and landlord/tenant issues.

Action 3: The County and each participating jurisdiction will support fair housing service providers (e.g., San Joaquin Fair Housing Association) and other housing service agencies in providing credit counseling, homebuyer counseling and education, and education on tenant rights and responsibilities for households entering or re-entering the rental market, such as formerly homeless households, and those entering the homeownership market.

Fair Housing Services and Outreach

Action 4: The County and each participating jurisdiction will work with SJFH or a similar organization to design and implement a comprehensive testing program in San Joaquin County to identify the extent of fair housing problems in the county. The results will allow SJFH to target its programs to address the problems identified. SJFH shall seek additional funding, such as special grants, to carry out the testing program as well as pursue partnerships with other organizations, such as University of the Pacific or WorkNet.

Action 5: The County and each participating jurisdiction will continue to work with the fair housing service providers (e.g., San Joaquin Fair Housing Association), the Housing Authority, and local apartment and Realtor associations to reach out to landlords and managers of

smaller rental properties. This outreach may include updating mailing lists of smaller rental landlords and managers to provide informational material regarding fair housing rights and responsibilities, including rights of persons with disabilities and persons using HCVs and other forms of housing assistance; and conducting fair housing workshops.

Action 6: The County and each participating jurisdiction will continue to support the primary fair housing service provider, San Joaquin Fair Housing Association (SJFH), in conducting fair housing workshops for residents, apartment owners, landlords, and property managers. Workshops will include translators who speak Spanish and other appropriate languages. The County shall work with SJFH to update and provide brochures for distribution at local service centers and at city and county offices. The County and each participating jurisdiction will provide phone numbers and referral information to the SJFH on their websites and will make referrals to SJFH as issues/cases come to their attention. The County will encourage the fair housing service provider to coordinate with the real estate and apartment associations regarding fair housing training.

Action 7: The County and each participating jurisdiction will work with SJFH to increase awareness of the rights of persons with disabilities, ADA issues, reasonable accommodation, and available services.

Action 8: The County and each participating jurisdiction will continue to comply with antidiscrimination requirements, including all applicable federal regulations as demonstrated in the County's application for Community Development Block Grant, HOME, and other federal funds, and newly enacted California SB 329.

Action 9: The County will work with SJFH to explore establishing an anonymous complaint forum for tenants that may fear retaliation if they report housing problems. Properties that are the subject of anonymous complaints could then be subject to monitoring and testing.

Public Policies and Programs

Action 10: The County and each participating jurisdiction will continue to implement policies and programs identified in their respective General Plan Housing Elements and implement zoning ordinance amendments necessary to further fair housing. In addition, the following actions need to be taken:

- San Joaquin County should amend the Development Title to update the current definition of "family" to remove the restriction on the number of non-related individuals and to restrict the development of single-family units in medium- and high-density (i.e., multifamily) zoning districts.

- The City of Lathrop should amend its zoning ordinance to update the current definition of "family" to remove the restriction on the number of non-related individuals; restrict the development of single-family units in medium- and high-density (i.e., multifamily) zoning districts; and comply with State law regarding density bonus provisions.
- The City of Ripon should amend its zoning ordinance to update the current definition of "family" to remove the restriction on the number of non-related individuals and to restrict the development of single-family units in multifamily zoning districts.

Action 11: The County and each participating jurisdiction must ensure full compliance with State law regarding Second Units on land zoned for single-family residential development:

- The City of Tracy should consider whether the exclusion of second units in zones designated for Residential Mobile Homes (RMH) complies with State law and, if not, amend its zoning ordinance to ensure full compliance.
- The City of Lathrop should proceed with approving the amendment to its zoning ordinance that officially permits second units on land zoned for Single-Family Residential (R-MV, RX-MV) in the Mossdale Village development.

Action 12: The County and each participating jurisdiction should encourage the establishment of additional licensed community care facilities – particularly in unincorporated parts of the County - in order to decentralize the location of such facilities, which are predominantly located within the cities of Stockton and Lodi. Nonetheless, such facilities should, to the extent feasible, be cited in locations with access to desired amenities, such as health care and retail services.

Action 13: San Joaquin County should monitor and assess the needs of farmworker households and work with Urban County jurisdictions to facilitate the creation of more appropriate and affordable housing opportunities for farmworker households within the Urban County.

Action 14: The County and each participating jurisdiction should monitor the availability of units adequately sized for larger lower-income households, such as three-bedroom rentals. All jurisdictions should consider actions to preserve and facilitate the development of such units.

Action 15: The County should consider updating the 2004 housing conditions survey to reassess the state of the existing housing stock.

Action 16: The County and participating jurisdictions should implement streamlined approvals for residential developments that provide affordable housing, including by-right approvals for 100 percent affordable developments.

Action 17: The County and participating jurisdictions should evaluate and identify potential sources of local gap funding for affordable housing development, including but not limited to affordable housing bonds, affordable housing impact fees, and/or a vacant land tax.

Action 18: The County should evaluate and identify potential sources of funding for landlord incentive payments to encourage private landlords to accept HCVs, coupled with education about the anti-discrimination requirements of SB 329.

Action 19: The County and each participating jurisdiction should review development standards and residential site availability to facilitate the attraction of well-qualified market-rate and affordable housing developers. This action could be implemented as part of each jurisdiction's upcoming General Plan Housing Element Update process.

Action 20: The County should explore opportunities to work with nonprofit housing providers to acquire and rehabilitate foreclosed residential properties and properties in default and rent or sell the rehabilitated properties to low- and moderate-income households.

SECTION 1 – INTRODUCTION

1.1 – Purpose

The Consolidated Plan regulations – under Title 24, Part 91, of the Code of Federal Regulations – require that communities that receive funding from the U.S. Department of Housing and Urban Development (HUD) on an entitlement basis submit a certification that they are affirmatively furthering fair housing.[2] To provide support for this certification, each Entitlement jurisdiction is required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to outline the actions that would be appropriate to overcome the impediments identified in the analysis. Subsequently, each jurisdiction is required to maintain records verifying that the AI was conducted and identifying the actions that were taken.

The purpose of the Analysis of Impediments is broad, and includes analysis of public and private policies, practices, and procedures that influence housing choice within a jurisdiction. The AI serves as the logical basis for fair housing planning. It also provides essential information to policy makers, planning staff, housing providers, lending institutions, and fair housing advocates. Stakeholders can then use this information to address impediments to fair housing and the information can help to build support for both public and private sector fair housing initiatives.

The following AI, for the San Joaquin Urban County[3] in California, identifies actions to be taken between 2020 and 2025. The AI is divided into five distinct sections:

Section 1 – Introduction and overview of the Analysis of Impediments to Fair Housing Choice

Section 2 – Analysis of demographic and economic characteristics, housing stock and affordability, geographic distribution of minority and low-income populations, and information on assisted housing resources

Section 3 – Assessment of public and private sector impediments

Section 4 – Assessment of fair housing practices and evaluation of 2015 to 2020 AI action item implementation

Section 5 – Recommended action items for the 2020 to 2025 reporting period

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[2] U.S. Department of Housing and Urban Development. (1996). Fair Housing Planning Guide (HUD-1582B-FHEO). Available at: http://www.hud.gov/offices/fheo/images/fhpg.pdf

[3] For a definition of the San Joaquin Urban County, please refer to section 1.5 on page 5.

What Is An Impediment to Fair Housing Choice?

While there are many factors in the public and private domains that have the potential to prevent or delay equal access to housing, HUD defines an impediment to fair housing choice as:

1) Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice;

2) Any actions, omissions, or decisions that have this effect.[4]

According to HUD's 1996 *Fair Housing Planning Guide*, an impediment to fair housing choice constitutes a violation, or potential violation, of the Fair Housing Act, and is counterproductive to fair housing choice, having the effect of restricting housing opportunities for members of federally protected classes (i.e., race, color, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, veteran status, genetic information).

The Unruh Civil Rights Act – Section 51 of the Civil Code of California – ensures equal status and protection from discrimination by all business establishments, including housing and accommodations. It expands the list of federal protected classes (i.e., race, color, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, veteran status, genetic information) to also include ancestry, medical condition, HIV or AIDS status, and sexual orientation. The Supreme Court of California has further clarified that protections under the Unruh Act are not necessarily restricted to the above characteristics. As a result, the Act covers all arbitrary and intentional discrimination by a business establishment on the basis of any personal characteristics similar to those listed above.

Affordability is Not a Fair Housing Issue

An evaluation of potential impediments to fair housing choice must distinguish between access to housing based on cost and affordability versus access to housing based on illegal discrimination. Affordability, by itself, is not a fair housing issue. When a household has problems accessing housing due to cost, no fair housing law is violated. However, when affordability disproportionately impacts protected classes, additional analysis is necessary to identify whether impediments to fair housing exist and whether legal discrimination has occurred. The degree to which protected classes are impacted by housing affordability is documented, to the extent possible, later in this report. This is accompanied by an evaluation of the degree to which affordability constitutes an impediment to fair housing.

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[4] *Ibid.*

1.2 – Regulatory Setting

Federal Fair Housing

The Federal Fair Housing Act (1968) and the Fair Housing Amendments Act (1988) represent federal fair housing legislation that prohibits discrimination in all aspects of housing, including the sale, rental, lease, or negotiation for real property. The 1968 Fair Housing Act prohibits discrimination based on race, color, national origin, religion, or sex (i.e., protected classes). The 1988 the Fair Housing Act was amended to also prohibit discrimination based on familial status and physical or mental disability. The amendment to the Fair Housing Act also instituted housing code standards for new multifamily dwellings to accommodate persons with disabilities and establishes the right to "reasonable accommodations." The reasonable accommodations rule ensures the rights of tenants to make reasonable modifications to a dwelling, at their own expense, to accommodate the needs of persons with disabilities, and prohibits landlords from refusing reasonable requests for modifications to rules, policies, practices, or services, if they are necessary to accommodate persons with disabilities.

State Fair Housing

The Fair Employment and Housing Act (FEHA) – Part 2.8 of the California Government Code – and the Unruh Civil Rights Act – Section 51 of the California Civil Code – represent principal legislative statutes in the State of California that prohibit discrimination against protected classes and which promote fair housing. The FEHA prohibits housing discrimination and harassment in all its forms, including all practices, policies, and regulations relating to the rental and sale of real property, eviction, mortgage lending, insurance, and land use and zoning. The FEHA also prohibits retaliation against individuals or entities who have filed a complaint with the California Department of Fair Employment and Housing, participated in a Department investigation, or opposed any prohibited activity. In addition, the newly enacted SB 329 prohibits discrimination against tenants who use HCVs and other forms of housing assistance.

1.3 – Key Terms

Fair Housing: A condition in which individuals of similar income levels in the same housing market have a like range of housing choices available to them, regardless of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.

Impediments: HUD defines impediments to fair housing choice as: 1) any actions, omissions or decisions taken because of race, color, religion, sex, disability, familial status or national origin, which restrict housing choice or the availability of housing choices; 2) any actions, omissions, or decisions that have the effect of restricting housing choices on the basis of race, color, religion, sex disability, familial status or national origin.

Persons with Disabilities: Federal laws define a person with a disability as "any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment." In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental disability that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.

Reasonable Accommodations: A reasonable accommodation is a change in rules, policies, practices, or services so that a person with a disability will have an equal opportunity to use and enjoy a dwelling unit or common space. A housing provider should do everything possible to assist, but is not required to make changes that would fundamentally alter the program or create an undue financial and administrative burden. Reasonable accommodations may be necessary at all stages of the housing process, including application, tenancy, or to prevent eviction.

Protected Class: A characteristic of a person, which cannot be used as the basis for discrimination or discriminatory actions or omissions. The following are protected classes:

<u>Under Federal Law</u>

- Race
- Color
- Religion
- National Origin
- Age
- Sex
- Pregnancy
- Citizenship
- Familial Status
- Disability
- Veteran Status
- Genetic Information

<u>Under California Law</u>

- Race
- Color
- Religion
- National Origin
- Sex
- Disability
- Age
- Ancestry
- Medical Condition
- HIV or AIDS Status
- Marital Status
- Source of Income
- Sexual Orientation
- Other Arbitrary Characteristics

1.4 – Methodology

The format of the AI report and the analysis contained therein adheres to recommendations contained in HUD's 2010 *Fair Housing Planning Guide*. The analysis incorporates information collected from the 2015-2023 San Joaquin County General Plan Housing Element, the 2015-2020 San Joaquin County Consolidated Plan, and the 2020-2025 San Joaquin County Consolidated Plan. The analysis also utilizes data from the U.S. Census Bureau (Census), the California Department of Finance (DoF), the California Department of Housing and Community Development (HCD), U.S. Department of Housing and Urban Development (HUD), and the Federal Financial Institutions Examination Council (FFIEC), among other sources. To

supplement these quantitative data sets, the consultant team also interviewed a variety of local housing specialists, fair housing advocates, and private sector housing professionals. The information collected via the qualitative interview process was incorporated throughout the AI report and was used to identify recommended action items.

1.5 – Geographic Scope

The main analytical focus of this report is the San Joaquin Urban County (Urban County), which is defined to include all of unincorporated San Joaquin County, and the cities of Tracy, Manteca, Lathrop, Ripon and Escalon. Most data for the Urban County is presented in comparison to data for the State of California, and in some cases, to data for San Joaquin County as a whole. Data for the County overall is shown in cases where data for the Urban County are unavailable.

1.6 – Outreach and Public Participation

HUD regulations for the development of the AI require jurisdictions to consult with public agencies and organizations to identify impediments to fair housing choice within San Joaquin County and develop clear strategies and implementing actions to overcome them.

To facilitate preparation of the AI, San Joaquin County and BAE conducted one-on-one consultations with various agencies and organizations located throughout the county, including partner jurisdictions, public and assisted housing providers and developers, and an assortment of government and social service agencies. See Appendix A for a list of those organizations and individuals who participated in the one-on-one consultations.

SECTION 2 – EXISTING CONDITIONS

2.1 – Population and Age Trends

According to Census and DoF data, the San Joaquin County population grew from 563,598 residents in 2010 to 773,632 residents in 2020. As reported in Table 1, this represents an annual average growth rate of 1.2 percent, which was notably slower than for the decade prior, when the annual growth rate was 2.0 percent. The average annual growth rate in the San Joaquin Urban County between 2010 and 2020 was 1.6 percent, which was down from 2.3 percent in the prior decade. Because the Urban County has grown faster than the County as a whole since the beginning of the new millennium, the Urban County's share of the total countywide population has increased from 48.3 percent in 2010 to 50.0 percent in 2020.

Unincorporated San Joaquin County accounts for 17.2 percent of the growth in the Urban County between 2000 and 2010, and 25.6 percent between 2010 and 2020. Moreover, the Urban County accounts for 56.3 percent and 63.6 percent of overall county growth between 2000 and 2010, and 2010 and 2020, respectively. In both decades, the San Joaquin Urban County population grew at a faster rate than San Joaquin County as a whole, which itself grew at a faster rate than the State of California. In addition, the average annual growth rate in the Urban County slowed to 1.2 percent between 2008 and 2009 due to the impacts of the Great Recession. The growth rate recovered to pre-recession levels by 2014 and has remained at 1.8 percent or higher ever since. Similarly, the countywide growth rate slowed to 0.8 percent between 2008 and 2009, recovering to 1.1 percent or higher as of 2015.

Table 1: Population Growth Trends, San Joaquin County, San Joaquin Urban County and Member Jurisdictions, and State of California, 2000-2020

	San Joaquin Urban County (a)								
Year	Escalon	Lathrop	Manteca	Ripon	Tracy	**Unincorporated San Joaquin**	**San Joaquin Urban County Total**	**San Joaquin County**	**State of California**
2000	5,963	10,445	49,255	10,158	56,929	130,066	262,816	563,598	33,873,086
2001	6,134	10,802	51,396	10,564	61,048	131,535	271,479	578,121	34,256,789
2002	6,369	11,616	54,787	10,995	65,993	132,434	282,194	596,039	34,725,516
2003	6,581	12,089	56,802	11,290	70,060	133,452	290,274	612,295	35,163,609
2004	6,649	12,482	59,240	11,890	74,745	133,589	298,595	629,787	35,570,847
2005	6,842	12,768	60,598	12,599	78,228	135,108	306,143	645,059	35,869,173
2006	6,942	14,489	61,926	13,094	80,152	135,364	311,967	656,247	36,116,202
2007	6,964	16,271	62,875	13,588	80,700	137,508	317,906	665,304	36,399,676
2008	7,027	17,282	64,316	13,869	81,490	139,666	323,650	672,492	36,704,375
2009	7,086	17,589	65,652	14,146	82,040	140,933	327,446	677,833	36,966,713
2010	7,129	17,945	66,776	14,290	82,800	141,732	330,672	684,057	37,223,900
Annual Change '00-'10	**1.8%**	**5.6%**	**3.1%**	**3.5%**	**3.8%**	**0.9%**	**2.3%**	**2.0%**	**0.9%**
2011	7,178	18,672	68,571	14,416	83,511	142,931	335,279	691,982	37,561,624
2012	7,217	19,009	70,161	14,538	84,358	143,302	338,585	699,127	37,924,661
2013	7,200	19,493	71,903	14,571	85,570	143,092	341,829	704,615	38,269,864
2014	7,234	19,968	73,004	14,633	86,063	144,902	345,804	711,119	38,556,731
2015	7,396	20,719	74,721	14,836	87,202	147,307	352,181	722,627	38,870,150
2016	7,408	22,099	76,692	14,982	88,760	149,314	359,255	734,091	39,131,307
2017	7,453	23,117	78,738	15,374	90,566	151,206	366,454	745,481	39,398,702
2018	7,441	24,185	80,829	15,447	92,631	152,061	372,594	753,934	39,586,646
2019	7,442	25,401	83,395	15,688	94,586	154,343	380,855	765,556	39,695,376
2020	7,478	26,833	84,800	15,930	95,931	156,208	387,180	773,632	39,782,870
Annual Change '10-'20	**0.5%**	**4.1%**	**2.4%**	**1.1%**	**1.6%**	**1.0%**	**1.6%**	**1.2%**	**0.6%**

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: California Department of Finance, E-4, 2020; BAE, 2020.

As shown in Table 2, the median age in the Urban County was 35.3 years in 2018, which represents an increase from 34.1 years in 2010. By comparison, the 2018 median age in California was 36.4 years, which also represents an increase from the 2010 median age of 35.2 years. These trends correspond with an aging population, as the size of the older population has grown more quickly compared to the younger cohorts. There is one key exception to this trend, however, as the share of residents aged 18 to 24 years grew much

more rapidly in the Urban County compared to the State of California, at 9.3 percent compared to 1.7 percent.

Table 2: Age Distribution, San Joaquin Urban County and State of California, 2006-2010 and 2014-2018

	San Joaquin Urban County (a)			
	2010		2018	
Age Range	Number	Percent	Number	Percent
Under 18	96,104	29.0%	98,253	27.2%
18-24	31,323	9.4%	34,246	9.5%
25-34	42,123	12.7%	46,744	13.0%
35-44	46,808	14.1%	48,232	13.4%
45-54	48,216	14.5%	48,773	13.5%
55-64	33,339	10.1%	40,933	11.3%
65-74	18,793	5.7%	25,834	7.2%
75-84	10,677	3.2%	12,767	3.5%
85 years & older	4,082	1.2%	5,141	1.4%
Total, All Ages	**331,465**	**100.0%**	**360,923**	**100.0%**
Median Age	**34.1**		**35.3**	

	State of California			
	2010		2018	
Age Range	Number	Percent	Number	Percent
Under 18	9,295,040	25.0%	9,073,655	23.2%
18-24	3,922,951	10.5%	3,856,220	9.9%
25-34	5,317,877	14.3%	5,904,012	15.1%
35-44	5,182,710	13.9%	5,185,165	13.2%
45-54	5,252,371	14.1%	5,155,853	13.2%
55-64	4,036,493	10.8%	4,658,398	11.9%
65-74	2,275,336	6.1%	3,061,431	7.8%
75-84	1,370,210	3.7%	1,552,456	4.0%
85 years & older	600,968	1.6%	701,570	1.8%
Total, All Ages	**37,253,956**	**100.0%**	**39,148,760**	**100.0%**
Median Age	**35.2**		**36.4**	

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, 2000 Census and ACS 2018 five-year sample period, P12, B01001; BAE, 2020.

2.2 – Racial and Ethnic Characteristics

According to the data reported in Tables 3 and 4, the racial and ethnic diversity of the San Joaquin Urban County and the State of California increased substantially between 2010 and 2018. According to the Census, just over 55 percent of the population in the San Joaquin Urban County were members of minority groups in 2010, compared to just over 60 percent in 2018. This represents an increase of 5.3 percentage points. By comparison, the percent of the statewide population who were members of minority groups increased by 3.4 percent over the same period. Though the percentage of minorities in the Urban County is somewhat lower than the statewide figure, the minority population in the Urban County is growing much more

quickly than the population as a whole, which is narrowing the gap between the county and the state.

As shown in Table 3, Hispanic and Latino residents made up the largest minority subpopulation within the Urban County in 2018, with 148,187 people. The next largest minority subpopulations include Asians (39,678 people), African Americans (13,732), and persons of two or more races (13,524). Though they represent a relatively small proportion of the total population, the Asian population grew significantly between 2010 and 2018, at 36 percent. The subpopulation with the next highest growth rate was Hispanics and Latinos at 21.9 percent. A comparison between growth within these two subpopulations compared to the minority population at large indicates that around 51 percent of the new minority residents within the Urban County are part of one of these two subpopulations.

Table 3: Population by Race and Ethnicity, San Joaquin Urban County and State of California, 2010-2018

	San Joaquin Urban County (a)			
	2010		2018	
	Number	Percent	Number	Percent
Non-Hispanic or Latino				
White alone	145,623	44.9%	143,031	39.6%
Black or African American alone	12,940	4.0%	13,732	3.8%
American Indian and Alaska Native alone	1,740	0.5%	915	0.3%
Asian alone	29,185	9.0%	39,678	11.0%
Native Hawaiian and Other Pacific Islander alone	1,597	0.5%	1,336	0.4%
Some other race alone	841	0.3%	520	0.1%
Two or more races	10,471	3.2%	13,524	3.7%
Subtotal, All Non-Hispanic or Latino	**202,397**	**62.5%**	**212,736**	**58.9%**
Hispanic or Latino				
White alone	71,762	22.1%	91,370	25.3%
Black or African American alone	921	0.3%	856	0.2%
American Indian and Alaska Native alone	1,570	0.5%	1,357	0.4%
Asian alone	916	0.3%	905	0.3%
Native Hawaiian and Other Pacific Islander alone	118	0.0%	243	0.1%
Some other race alone	37,912	11.7%	35,367	9.8%
Two or more races	8,415	2.6%	18,089	5.0%
Subtotal, All Hispanic or Latino	**121,614**	**37.5%**	**148,187**	**41.1%**
Total, All Races and Ethnicities	**324,011**	**100.0%**	**360,923**	**100.0%**

	State of California			
	2010		2018	
	Number	Percent	Number	Percent
Non-Hispanic or Latino				
White alone	15,107,042	41.2%	14,695,836	37.5%
Black or African American alone	2,163,955	5.9%	2,164,519	5.5%
American Indian and Alaska Native alone	153,430	0.4%	138,427	0.4%
Asian alone	4,683,828	12.8%	5,525,439	14.1%
Native Hawaiian and Other Pacific Islander alone	131,505	0.4%	12,878	0.0%
Some other race alone	109,184	0.3%	97,763	0.2%
Two or more races	832,189	2.3%	1,166,288	3.0%
Subtotal, All Non-Hispanic or Latino	**23,181,133**	**63.3%**	**23,801,150**	**60.8%**
Hispanic or Latino				
White alone	7,285,671	19.9%	8,833,232	22.6%
Black or African American alone	82,356	0.2%	103,356	0.3%
American Indian and Alaska Native alone	130,198	0.4%	158,048	0.4%
Asian alone	63,424	0.2%	78,900	0.2%
Native Hawaiian and Other Pacific Islander alone	8,924	0.0%	14,455	0.0%
Some other race alone	5,339,425	14.6%	5,317,647	13.6%
Two or more races	546,159	1.5%	715,939	1.8%
Subtotal, All Hispanic or Latino	**13,456,157**	**36.7%**	**15,221,577**	**38.9%**
Total, All Races and Ethnicities	**36,637,290**	**100.0%**	**39,148,760**	**99.7%**

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, American Community Survey (ACS) 2010 five-year and 2018 five-year sample period, B03002; BAE, 2020.

Table 4: Minority Populations, San Joaquin Urban County and State of California, 2006-2010 and 2014-2018

	San Joaquin Urban County (a)			
	2010		2018	
Minority Groups	Number	Percent	Number	Percent
Black or African American	12,940	7.3%	13,732	6.3%
Asian	29,185	16.4%	39,678	18.2%
Hispanic	121,614	68.2%	148,187	68.0%
Other Minority	14,649	8.2%	16,295	7.5%
Total, All Minority Groups	**178,388**	**100%**	**217,892**	**100%**
% of total Populaton	**55.1%**		**60.4%**	

	State of California			
	2010		2018	
Minority Groups	Number	Percent	Number	Percent
Black or African American	2,163,955	10.1%	2,164,519	8.9%
Asian	4,683,828	21.8%	5,525,439	22.7%
Hispanic	13,456,157	62.5%	15,221,577	62.6%
Other Minority	1,226,308	5.7%	1,415,356	5.8%
Total, All Minority Groups	**21,530,248**	**100%**	**24,326,891**	**100%**
% of total Populaton	**58.8%**		**62.1%**	

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, ACS 2010 five-year and 2018 five-year sample period, B03002; BAE, 2020.

Geographic Concentrations of Race and Ethnicity

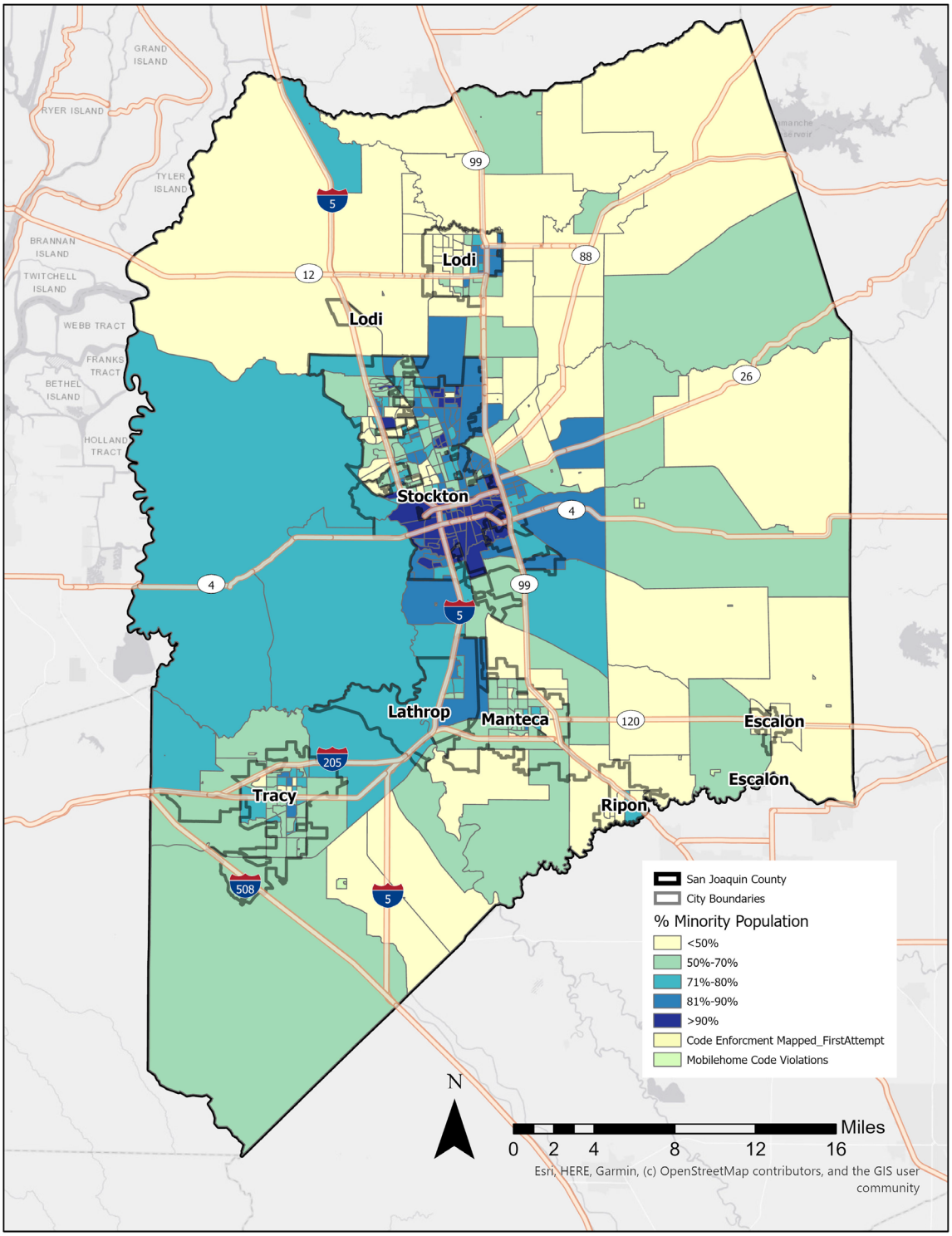
The following is a brief summary of the geographic distribution of minority residents throughout the San Joaquin Urban County. As illustrated in Figure 1, minority populations in San Joaquin County are most highly concentrated in and around the major urban centers, particularly southern Stockton, which is outside of the Urban County area which is the focus of this research. Nonetheless, there are notable minority concentrations in the unincorporated areas surrounding the City of Stockton, both north and south, as well as in French Camp and the unincorporated area west of Lodi. The central areas of Tracy, Manteca, and Ripon also have notable concentrations of minority residents. The unincorporated area to the west of Stockton shows a modestly high concentration of minority residents (i.e., between 71 to 80 percent). This area is relatively lightly populated and is mostly agricultural.

As noted in the section above, the Hispanic and Latino subpopulation is the largest minority group in the Urban County. As illustrated in Figure 5, there is a notable clustering of Census Block Groups with high concentrations of Hispanic and Latino residents in southern Stockton, as well as to the areas to the east and west of Stockton. Please note, again, that the cities of Stockton and Lodi are not part of the San Joaquin Urban County, though the unincorporated areas adjacent to these incorporated cities are. Notably, there are Block Groups located along State Highways 4 and 28 where more than 70 percent of the population is Hispanic or Latino.

There are also similar concentrations of Hispanic and Latino residents in the unincorporated French Camp community and in the unincorporated area to the west of Lodi.

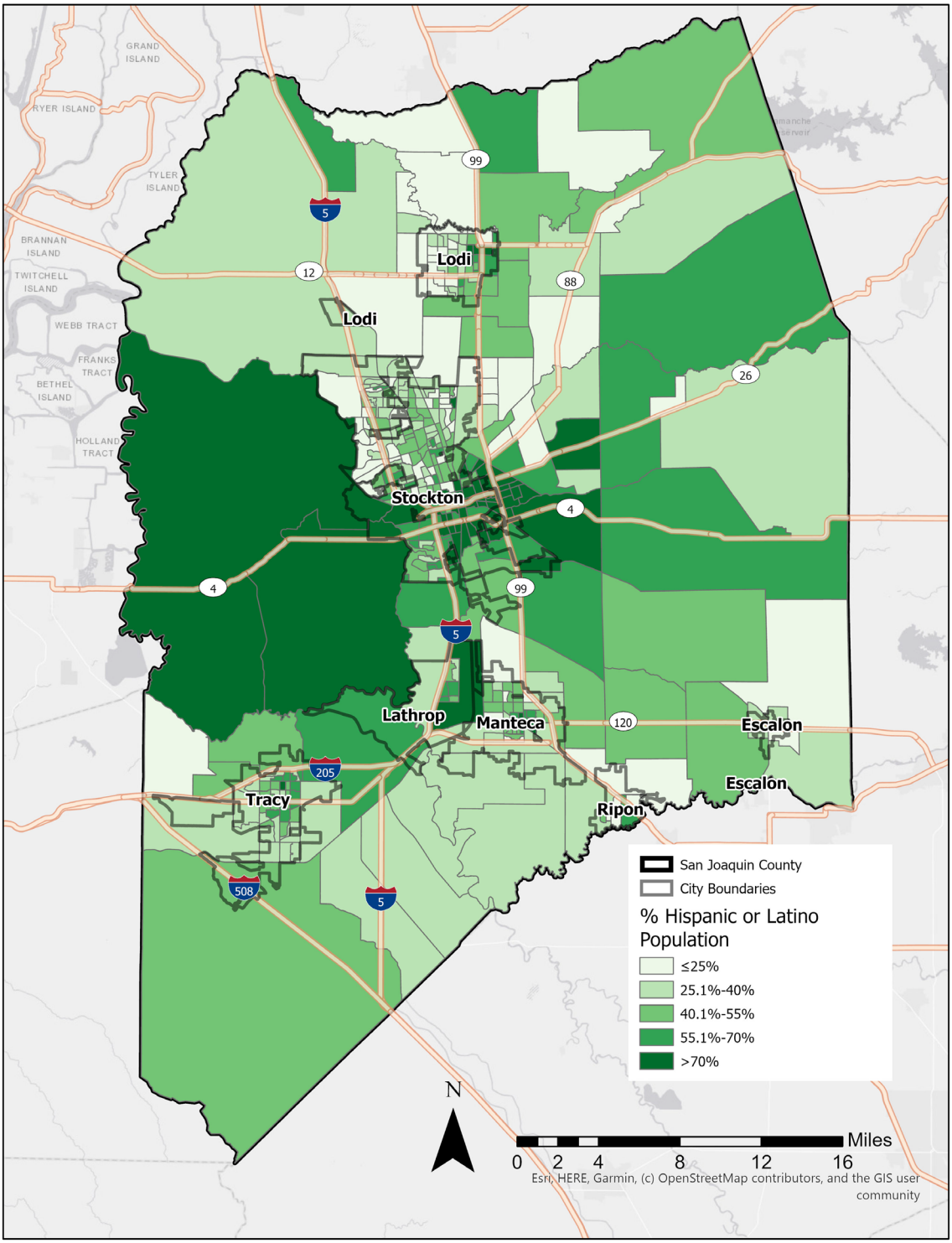
Figures 1 through 6 illustrate the geographic distribution of the remaining minority subpopulations within San Joaquin County. Most notably, there are relatively high concentrations of Asian residents in northern Stockton (i.e., not within the Urban County), as well as in French Camp and the unincorporated Mountain House community. Similarly, most of the African American population in San Joaquin County is also concentrated in Stockton, with lesser concentrations in the unincorporated county, mostly around Tracy. The Pacific Islander community is mainly concentrated in northern Stockton, with notable concentrations in and around Lodi, Tracy, and Manteca. The American Indian population, while quite small at just under 1,340 persons, is mainly concentrated in the areas to the south of Lodi and Manteca.

Figure 1: Percent Minority by Census Block Group, San Joaquin County, 2014-2018



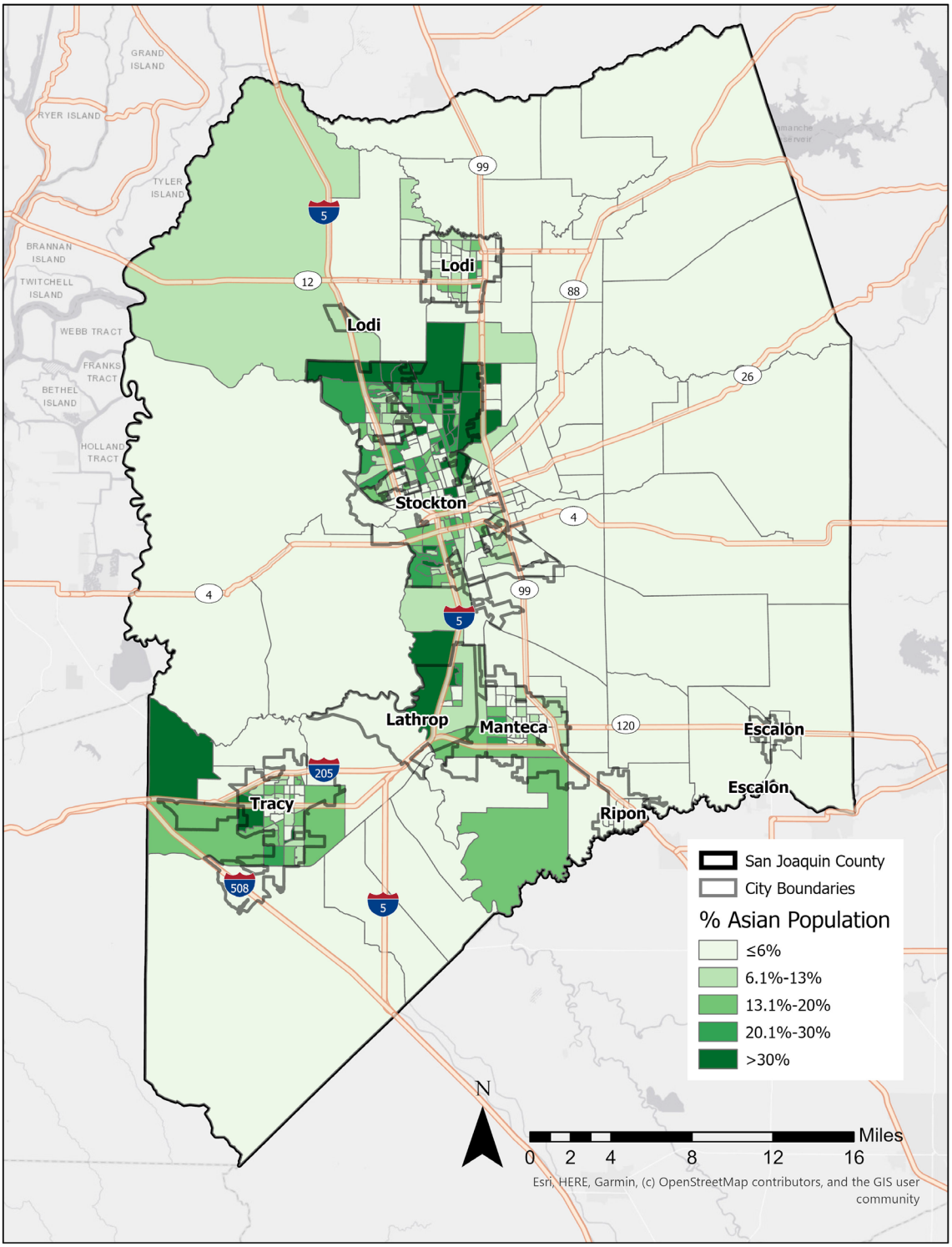
Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B03002; BAE, 2020.

Figure 2: Percent Hispanic/Latino by Census Block Group, San Joaquin County, 2014-2018



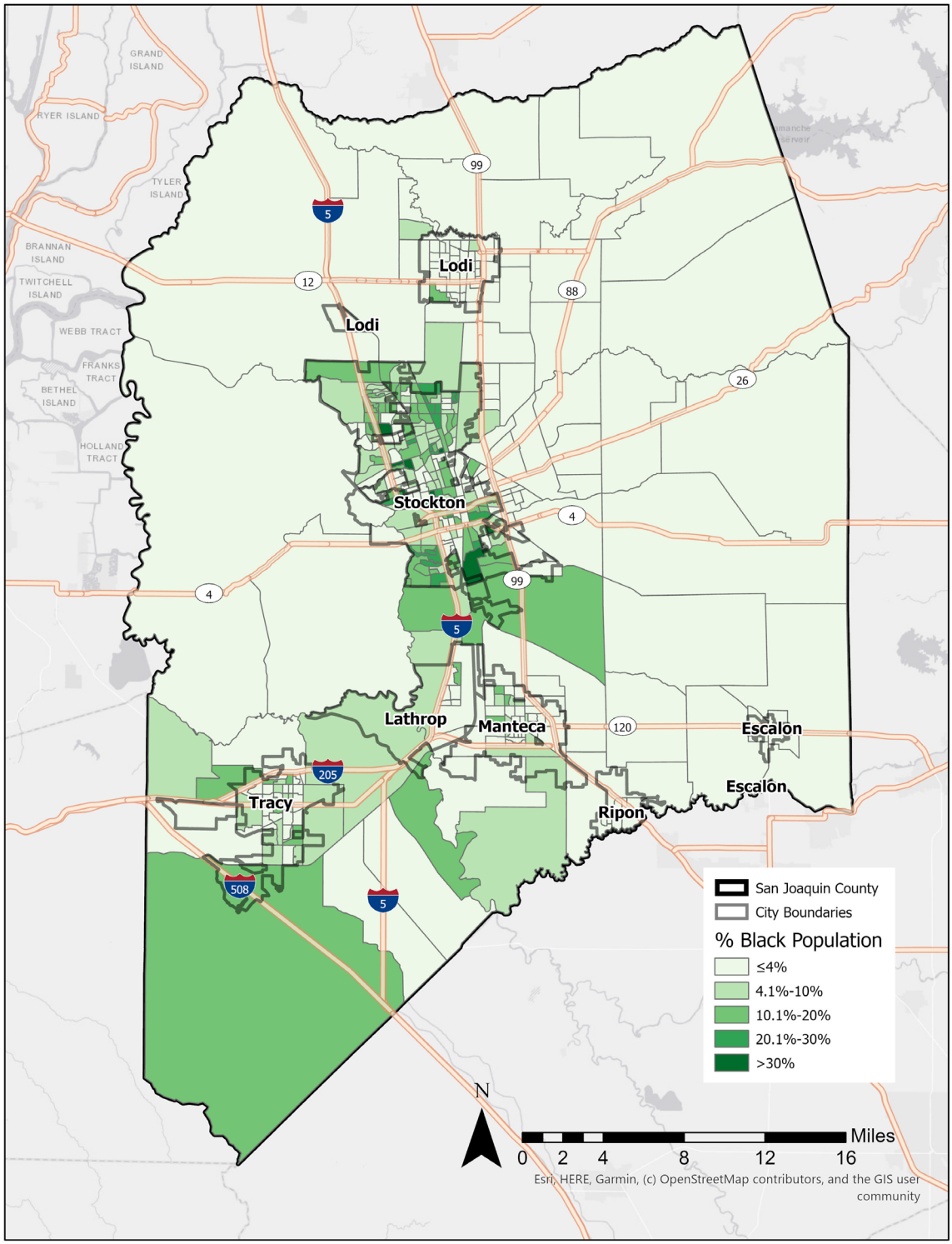
Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B03002; BAE, 2020.

Figure 3: Percent Asian by Census Block Group, San Joaquin County, 2014-2018



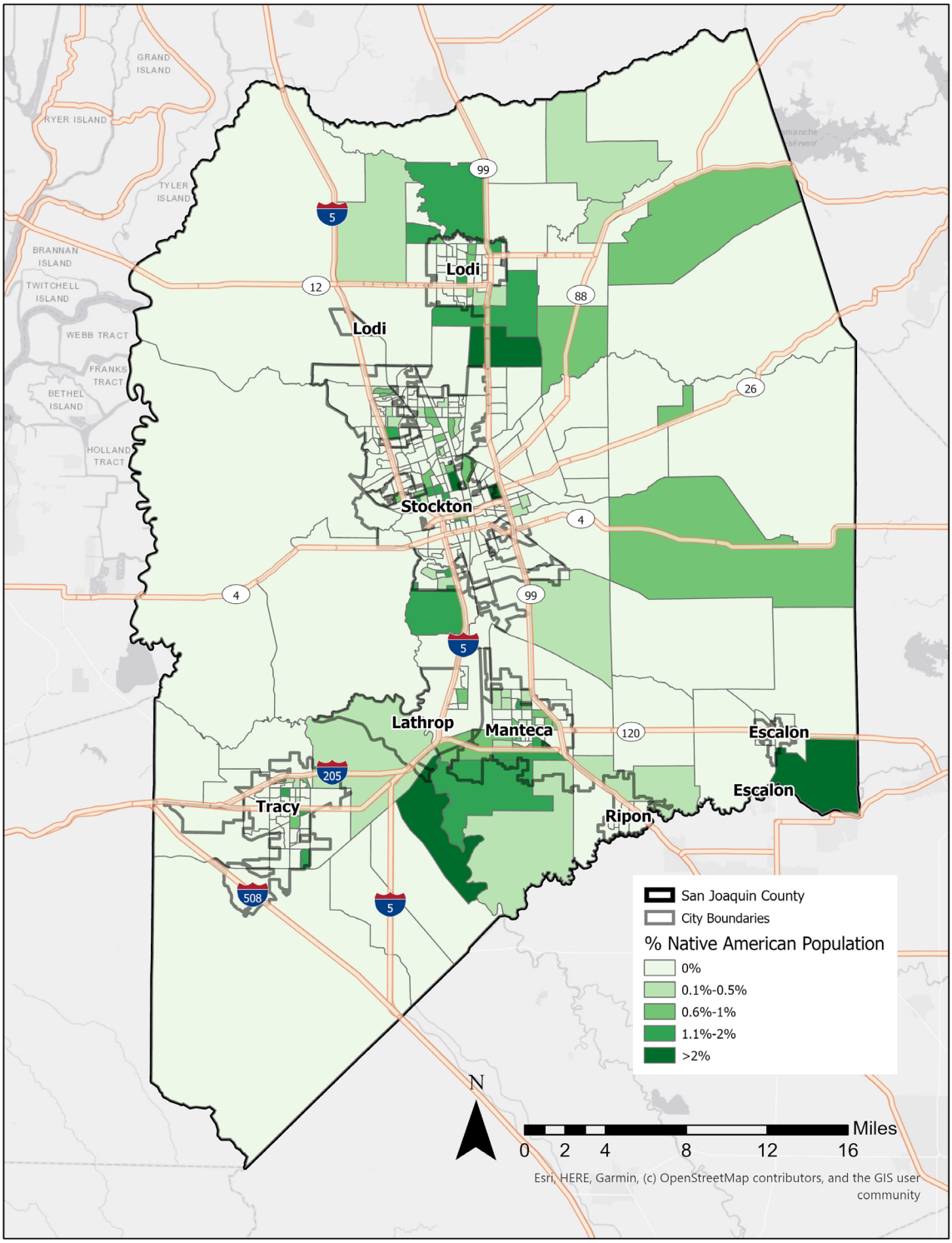
Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B03002; BAE, 2020.

Figure 4: Percent Black/African American by Census Block Group, San Joaquin County, 2014-2018



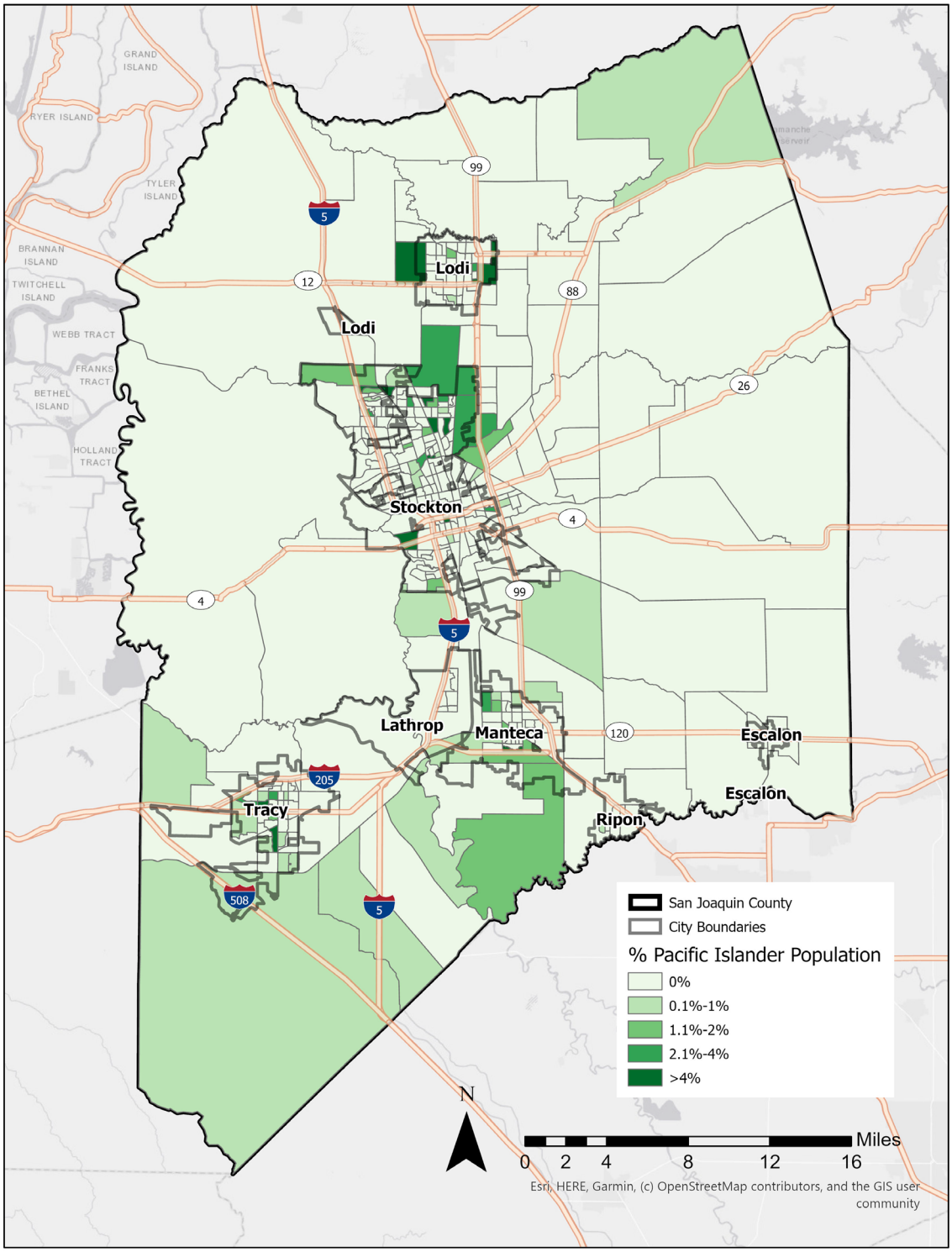
Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B03002; BAE, 2020.

Figure 5: Percent Native American by Census Block Group, San Joaquin County, 2014-2018



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B03002; BAE, 2020.

Figure 6: Percent Pacific Islander by Census Block Group, San Joaquin County, 2014-2018



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B03002; BAE, 2020.

Isolation Index

Another common quantitative metric for identifying patterns of geographic segregation is the isolation index, which compares a group's share of the overall population to the average share within a given Block Group. Ranging from 0 to 1, the isolation index represents the ratio of residents of a given race or ethnicity in a Block Group where the average resident of that group lives, correcting for the fact that this number increases mechanically with that group's share of the overall citywide population. Using Hispanic or Latino residents as an example, an aggregate isolation index of 0.40 indicates that the average Hispanic or Latino resident lives in a Block Group where the Hispanic share of the population exceeds the overall citywide average by roughly 40 percent. Isolation index values close to zero indicate that members of that minority group live in relatively integrated neighborhoods. [5] [6]

The formula for calculating the isolation index for San Joaquin County, by Census Block Group, is as follows: $I = \Sigma \mid P_{ig}/P_g * P_{ig}/P_{it} - P_g/P_t \mid / 1 - P_g/P_t$

- P_{ig} is the population of group g in Census Block Group i
- P_{it} is the total population in Census Block Group i
- P_g is the total population of group g in the City
- P_t is the total population in the City

Table 5 reports the isolation index scores for each major racial and ethnic group within San Joaquin County based on Block Group level data collected from the 2010 Decennial Census and the 2014-2018 ACS. According to this metric, the average Hispanic or Latino resident in the County lives in a Block Group where the Hispanic or Latino share of the population exceeds the overall County average by 50 percent, which is an increase from 46 percent in 2010. Non-Hispanic White residents also live in relatively segregated Block Groups, with an isolation index score 0.45 in 2018. Although less segregated than Non-Hispanic Whites or Hispanic or Latino residents, the Asian population isolation index increased from 0.25 to 0.28 between 2010 and 2018. Similarly, although less segregated than Asian residents, Black or African American residents also experienced segregation, with the isolation index for this group increasing from 0.12 to 0.15.

[5] HUD. (2013). *AFFH Data Documentation*. Available at: http://www.huduser.org/portal/publications/pdf/FR-5173-P-01_AFFH_data_documentation.pdf

[6] Glaeser, E. and Vigdor, J. (2001). *Racial Segregation in the 2000 Census: Promising News*. Washington, DC: The Brookings Institution, Center on Urban and Metropolitan Policy. Available at: http://www.brookings.edu/es/urban/census/glaeser.pdf

Table 5: Isolation Index, San Joaquin County, 2010 and 2014-2018

Racial and/or Ethnic Group	Isolation Index 2010	Isolation Index 2014-2018
Hispanic or Latino	0.46	0.50
Non-Hispanic White	0.48	0.45
Black or African American alone	0.12	0.15
American Indian and Alaska Native alone	0.01	0.02
Asian alone	0.25	0.28
Native Hawaiian and Other Pacific Islander alone	0.01	0.04
Some other race alone	0.01	0.02
Two or more races	0.04	0.06

Sources: U.S. Census Bureau, 2010 Decennial Census, P9, ACS 2014-2018 five-year sample period, B03002; BAE, 2020.

2.3 – Household Characteristics

Household Size and Type

Often, household characteristics, such as type, size, and income level can affect access to housing. According to the Census Bureau, a household includes all persons occupying a housing unit. Note that, according to official definitions, households exclude persons living in group quarters facilities, such as residence halls, treatment centers, group homes, nursing facilities, military barracks, correctional facilities, and workers' dormitories. A family is a type of household that includes a group of two or more people residing together, related by birth, marriage, or adoption. A family household consists of a householder, the members of his or her family, as well as any unrelated people who may reside with them. Non-family households may contain only one person (i.e. a single-person living alone) or may contain additional persons who are not related – by birth, marriage, or adoption – to the householder.

As suggested by the household definitions discussed above, the composition and size of a household are often interrelated. For example, communities with large proportions of family households with children often exhibit larger than average household sizes. As a result of these household characteristics, communities with greater numbers of large households often have greater need for larger housing units, which can better accommodate multiple residents. Communities with a preponderance of large households often exhibit a greater prevalence of residential overcrowding, which occurs when households occupy quarters that are too small to adequately suit their needs.

In the San Joaquin Urban County, there were 7,261 new households added between 2010 and 2018, of which 6,739, or 88.4 percent, are family households. Of the 882 new non-family households, 873 are single-person households. The differences in magnitude of new family households compared to non-family households has led to an increase in the share of family households, and it also helps to explain the increase in average household size from 3.10 to 3.24. However, this increase does not also accompany an increase in children under the age of 18 in the new family households, as only 184 new family households have children of their

own under 18 years of age. This suggests that the increase in average household size may be attributed to additional adults joining or re-joining family households, consistent with reports from affordable housing providers that individuals and households commonly move in with other family members due to an inability to find affordable housing in the County. These trends are reflective of statewide trends, where family households also make up an increasingly large share of all households while the share of family households with their own children under 18 has fallen, as summarized in Table 6.

Table 6: Household Characteristics, San Joaquin Urban County and State of California, 2010-2018

	San Joaquin Urban County (a)			
	2010		2018	
Household Type	Number	Percent	Number	Percent
Family Households	77,953	77.2%	84,692	78.0%
With Own Children Under 18	*40,970*	*40.6%*	*41,154*	*37.9%*
Non-Family Households	23,029	22.8%	23,911	22.0%
Single Person	*17,943*	*17.8%*	*18,816*	*17.3%*
Total, All Households	**100,982**	**100.0%**	**108,603**	**100.0%**
Average Household Size	**3.10**		**3.24**	

	State of California			
	2010		2018	
Household Type	Number	Percent	Number	Percent
Family Households	8,495,322	68.6%	8,915,228	68.8%
With Own Children Under 18	*4,205,305*	*33.9%*	*3,965,260*	*30.6%*
Non-Family Households	3,897,530	31.4%	4,050,207	31.2%
Single Person	*3,022,366*	*24.4%*	*3,084,533*	*23.8%*
Total, All Households	**12,392,852**	**100.0%**	**12,965,435**	**100.0%**
Average Household Size	**2.89**		**2.96**	

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, ACS 2010 five-year and 2018 five-year sample period, S1101, S0101, B11001, B26001; BAE, 2020.

Household Income

Income is a primary indicator of standard of living and is a critical factor in determining the ability of a household to balance housing costs with other basic needs, such as food and transportation. While housing affordability, in and of itself, does not constitute a fair housing issue, income bias (e.g., the denial of housing due to negative perceptions of lower income individuals and households) can represent an important fair housing concern.

According to the data provided in Table 7, the median income for households in the San Joaquin Urban County increased, in nominal dollars, from $63,233 in 2010 to $73,409 in 2018. The median income statewide also increased, in nominal terms, from $60,883 in 2010 to $71,228 in 2018. Once adjusted for inflation using the Bureau of Labor Statistics (BLS)

California Consumer Price Index (CPI), the median income in both the San Joaquin Urban County and the state of California decreased in real terms during this period. Specifically, the inflation-adjusted median annual income declined by an estimated $2,604 in the Urban County and by $1,943 in the state overall.

Table 7: Household Income Distribution and Median Income Estimates, San Joaquin Urban County and State of California, 2006-2010 and 2014-2018

	San Joaquin Urban County (a)				
	2010		2018		% Change
Household Income	Number	Percent	Number	Percent	2010-2018
Less than $14,999	8,984	8.9%	7,648	7.0%	-14.9%
$15,000 to $24,999	8,896	8.8%	8,671	8.0%	-2.5%
$25,000 to $34,999	9,063	9.0%	8,419	7.8%	-7.1%
$35,000 to $49,999	13,538	13.4%	12,181	11.2%	-10.0%
$50,000 to $74,999	18,911	18.7%	18,564	17.1%	-1.8%
$75,000 to $99,999	14,471	14.3%	15,433	14.2%	6.6%
$100,000 to $149,999	16,395	16.2%	20,112	18.5%	22.7%
$150,000 and above	10,724	10.6%	17,575	16.2%	63.9%
Total Households	**100,982**	**100.0%**	**108,603**	**100.0%**	7.5%
Median Household Income	**$63,233**		**$73,409**		
Inflation Adjusted (b)	*$78,202*		*$75,598*		

	State of California				
	2010		2018		% Change
Household Income	Number	Percent	Number	Percent	2010-2018
Less than $14,999	1,289,728	10.4%	1,230,046	9.5%	-4.6%
$15,000 to $24,999	1,173,282	9.5%	1,035,971	8.0%	-11.7%
$25,000 to $34,999	1,133,156	9.1%	1,023,222	7.9%	-9.7%
$35,000 to $49,999	1,568,638	12.7%	1,415,573	10.9%	-9.8%
$50,000 to $74,999	2,183,946	17.6%	2,065,373	15.9%	-5.4%
$75,000 to $99,999	1,586,032	12.8%	1,589,511	12.3%	0.2%
$100,000 to $149,999	1,861,933	15.0%	2,102,239	16.2%	12.9%
$150,000 and above	1,596,137	12.9%	2,503,500	19.3%	56.8%
Total Households	**12,392,852**	**100.0%**	**12,965,435**	**100.0%**	4.6%
Median Household Income	**$60,883**		**$71,228**		
Inflation Adjusted (b)	*$75,296*		*$73,352*		

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) The 2010 figures are adjusted to 2019 dollars using an inflation factor of 1.24, and the 2018 figures are adjusted using an inflation factor of 1.03.
Inflation factors are based on the California Consumer Price Index published by the California Department of Industrial Relations.

Sources: U.S. Census Bureau, ACS 2010 five-year and 2018 five-year sample period, B19001 and B19013; California Department of Industrial Relations, Consumer Price Index, 2020; BAE, 2020.

Table 8 reports the number of households residing in the San Joaquin Urban County and the State of California by HUD-defined income category. For the purposes of this analysis,

Extremely Low-Income households are assumed to have incomes equal to or less than 30 percent of the HUD Adjusted Median Family Income (HAMFI). Very Low-Income households are at 30 to 50 percent of HAMFI, Low-Income households are at 50 to 80 percent of HAMFI, Moderate-Income households are at 80 to 120 percent of HAMFI, and Above Moderate-Income households have incomes greater than 120 percent HAMFI. According to these definitions, around 35,645 households (33.7 percent) were categorized as Extremely Low-, Very Low-, or Low-Income between 2012 and 2016. By comparison, there were 70,210 Moderate- and Above Moderate-Income households (66.3 percent) between 2012 and 2016. During the same period, the State of California had 46.1 percent of households categorized as Extremely Low-, Very Low-, or Low-Income, and 53.9 percent of households categorized as Moderate- and Above Moderate-Income. Overall, lower income households are more likely to rent housing, while Moderate- and Above Moderate-Income households are more likely to own their homes, or at least are more likely to be able to access the for-sale housing market.

Table 8: Households by Income Category, San Joaquin Urban County and State of California, 2012-2016

	San Joaquin Urban County (a)					
	Owner Households		Renter Households		All Households	
Income Category (b)	Number	Percent	Number	Percent	Number	Percent
Extremely Low Income *(30% of HAMFI or Less)*	3,305	5.0%	6,085	15.5%	9,390	8.9%
Very Low Income *(30% to 50% of HAMFI)*	4,455	6.7%	6,145	15.7%	10,600	10.0%
Low Income *(50% to 80% of HAMFI*	7,730	11.6%	7,925	20.2%	15,655	14.8%
Moderate Income *(80% to 120% of HAMFI)*	11,315	17.0%	7,860	20.0%	19,175	18.1%
Above Moderate Income *(Above 120% of HAMFI)*	39,815	59.8%	11,220	28.6%	51,035	48.2%
All Income Levels (c)	**66,600**	**100.0%**	**39,245**	**100.0%**	**105,845**	**100.0%**

	State of California					
	Owner Households		Renter Households		All Households	
Income Category (b)	Number	Percent	Number	Percent	Number	Percent
Extremely Low Income *(30% of HAMFI or Less)*	555,360	8.0%	1,520,405	25.9%	2,075,765	16.2%
Very Low Income *(30% to 50% of HAMFI)*	639,060	9.2%	1,053,450	17.9%	1,692,510	13.2%
Low Income *(50% to 80% of HAMFI*	1,007,020	14.5%	1,130,760	19.2%	2,137,780	16.7%
Moderate Income *(80% to 120% of HAMFI)*	1,313,840	19.0%	979,305	16.7%	2,293,145	17.9%
Above Moderate Income *(Above 120% of HAMFI)*	3,413,735	49.3%	1,194,455	20.3%	4,608,190	36.0%
All Income Levels (c)	**6,929,005**	**100.0%**	**5,878,380**	**100.0%**	**12,807,385**	**100.0%**

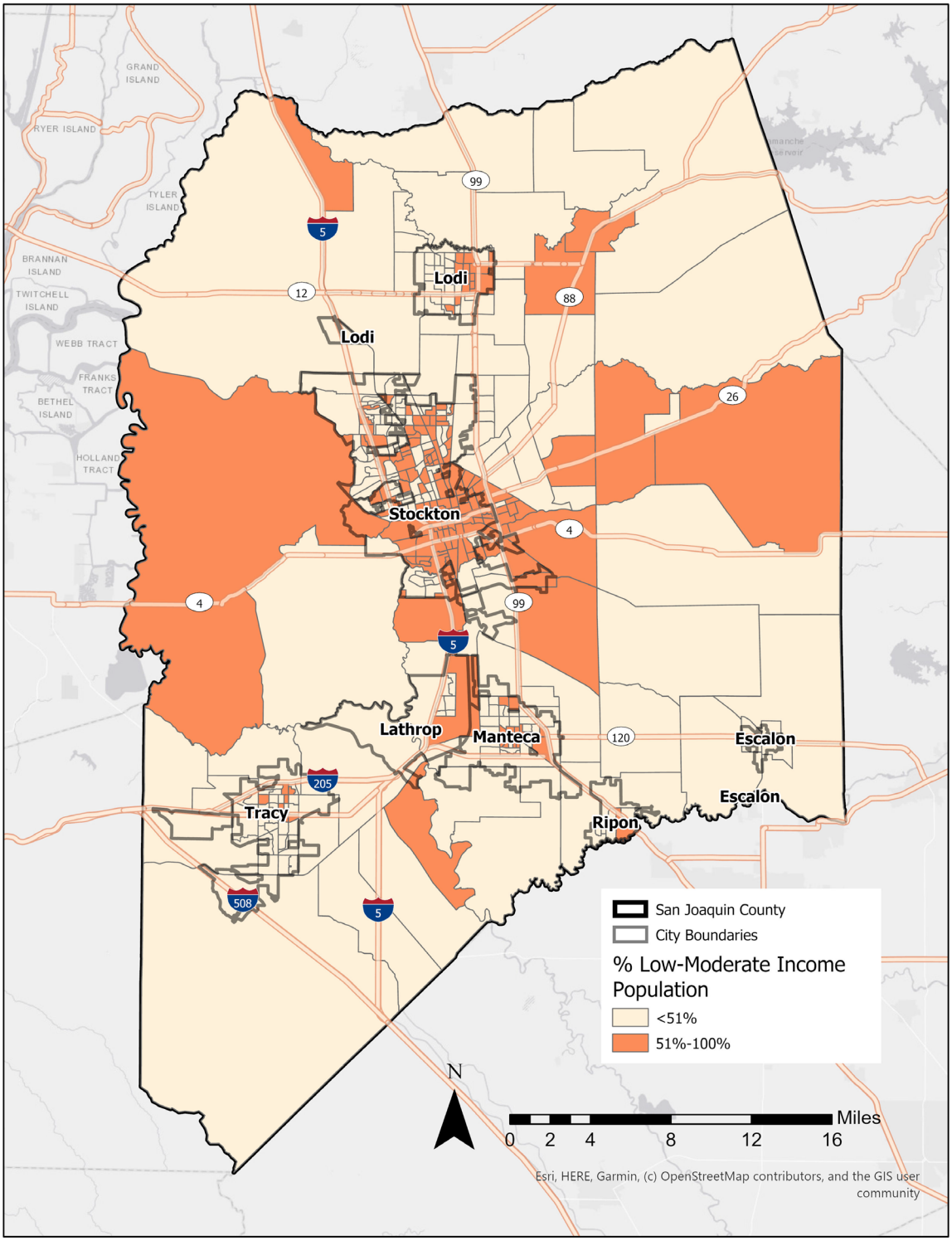
Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) CHAS data reflect HUD-defined household income limits. HAMFI stands for HUD Area Median Family Income.
(c) Totals do not equal the sum of individual figures due to independent rounding.

Sources: U.S. Department of Housing and Urban Development (HUD), 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) data; BAE, 2020.

Geographic Concentrations of Low- and Moderate-Income Households

Figure 7, on the following page, identifies the Block Groups within San Joaquin County based on the proportion of households who are Low- and Moderate-Income. The maps feature data from the HUD fiscal year 2019 Low- and Moderate-Income Individuals dataset (LMISD), which is based on the 2011-2015 ACS. In this case "Low-Income" means households at or below the Low-income level, including Very Low- and Extremely Low-Income. As illustrated in the figure, Block Groups where more than 50 percent of households are Low- and Moderate-Income are most highly concentrated in central and southern Stockton and Lodi (i.e., outside of the Urban County), as well as in parts of central Tracy, Manteca, Ripon, Lockeford, French Camp, Lathrop, Linden, Farmington, and Thornton. Most of the unincorporated area to the west of Stockton is also identified as majority Low- and Moderate-Income.

Figure 7: Low- and Moderate-Income Households by Census Block Group, 2014-2018



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B19001 and B19013; BAE, 2020.

2.4 - Poverty Characteristics

According to the 2014-2018 ACS,[7] Table 9 reports the average poverty rate between 2014 and 2018 by race and ethnicity.[8] Note that the figures for each racial group include persons of Hispanic or Latino descent, while figures for Hispanic or Latino residents include persons of all racial groups. According to these data, of the 353,312 residents in the San Joaquin Urban County for whom poverty status was determined, 11.8 percent had incomes below the poverty line. As shown in Table 9, White residents of any ethnicity accounted for 62.9 percent of all residents below the poverty line. The ethnic breakdown shows that 59.3 percent of residents below the poverty line were Hispanic or Latino, while Hispanic or Latino residents comprise 41.1 percent of the Urban County population. Therefore, the data indicate that Hispanic or Latino residents were overrepresented by 18.2 percentage points. Asian residents were conversely underrepresented by 3.8 percentage points, while White residents of any ethnicity were underrepresented by 2.2 percentage points.

Table 9: Poverty by Race and Ethnicity, San Joaquin Urban County, 2014-2018

	Below Poverty Line (b)			Total Population		Share in Poverty Minus Share of Total Population
San Joaquin Urban County	Number	Poverty Rate	Share of Total Pop. In Poverty	Number	Percent	
White	26,187	11.4%	62.9%	230,012	65.1%	-2.2%
Black or African American	1,327	10.3%	3.2%	12,918	3.7%	-0.5%
American Indian and Alaska Native	235	11.5%	0.6%	2,049	0.6%	0.0%
Asian	3,146	7.8%	7.6%	40,176	11.4%	-3.8%
Native Hawaiian and Other Pacific Islander	150	9.7%	0.4%	1,545	0.4%	-0.1%
Some other race alone	6,786	19.3%	16.3%	35,236	10.0%	6.3%
Two or more races	3,816	12.2%	9.2%	31,376	8.9%	0.3%
Total, All Races	**41,647**	**11.8%**	**100.0%**	**353,312**	**100.0%**	
Hispanic or Latino	24,679	17.0%	59.3%	145,217	41.1%	18.2%
Not Hispanic or Latino	16,968	8.2%	40.7%	208,095	58.9%	-18.2%
Total, All Ethnicities	**41,647**	**11.8%**	**100.0%**	**353,312**	**100.0%**	

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Includes only those residents for whom poverty status was determined.

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, S1701; BAE, 2020.

Geographic Concentration of Poverty

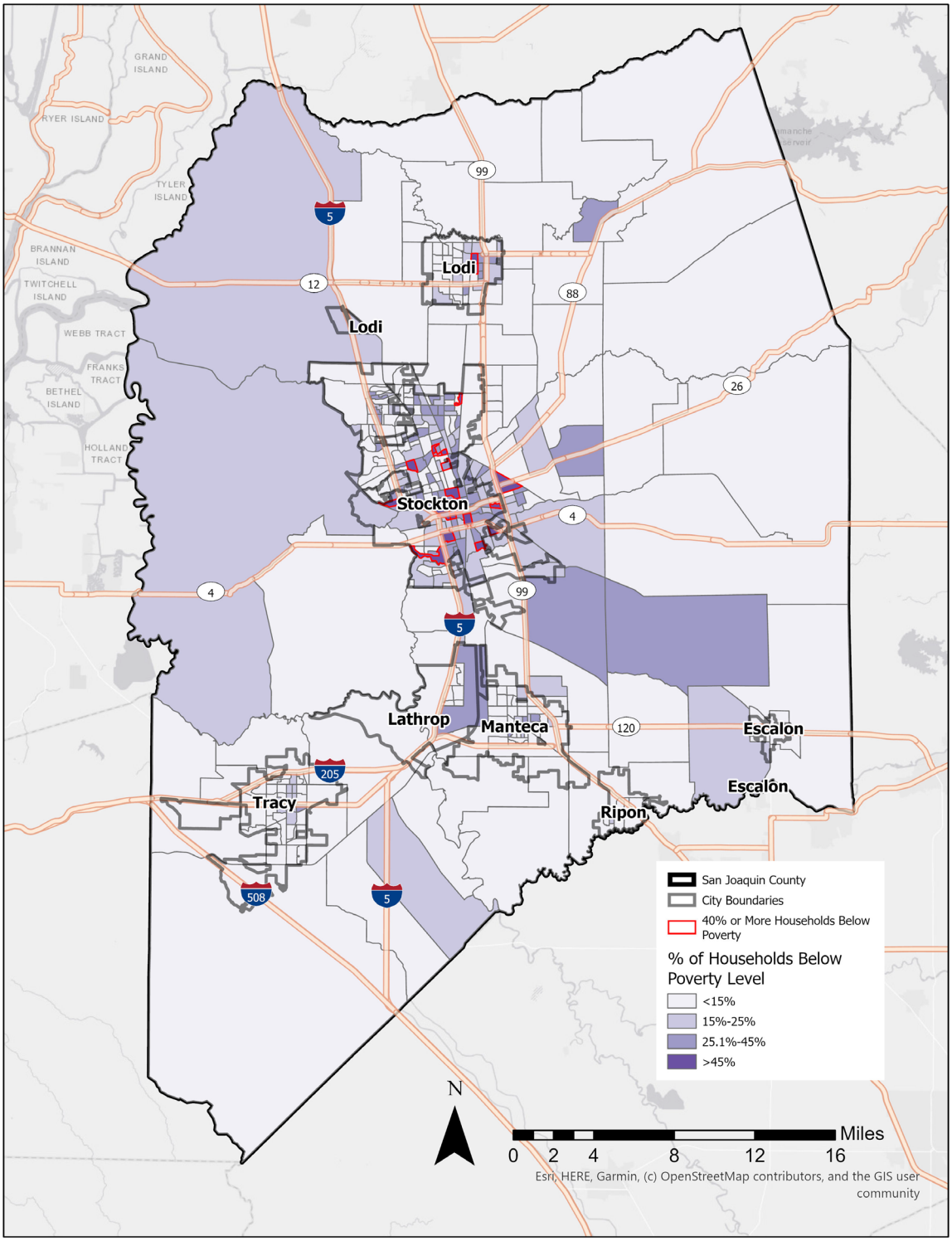
HUD considers Census Tracts or Block Groups with 40 percent or more of the population living at or below the poverty line to be areas of "extreme poverty."[9] As illustrated in Figure 8, the Block Groups exhibiting conditions of extreme poverty are all concentrated in and around the City of Stockton, as well as within central Lodi. None of the identified Block Groups exhibiting extreme poverty are in the Urban County.

[7] Note that the 2009-2013 ACS is the most recent available data source that provided full detail on the number of individuals living in poverty by racial and ethnic group. The poverty rate may differ from that reported elsewhere
[8] For additional information regarding the relative prevalence of poverty among sensitive populations other than the identified racial and ethnic minority groups, please refer to the section entitled *Special Needs Populations*.
[9] HUD. (2013). AFFH Data Documentation. FR-5173-P-01. Available at: http://www.huduser.org/publications/pdf/FR-5173-P-01_AFFH_data_documentation.pdf

Racially and Ethnically Concentrated Areas of Poverty (RCAP and ECAP)

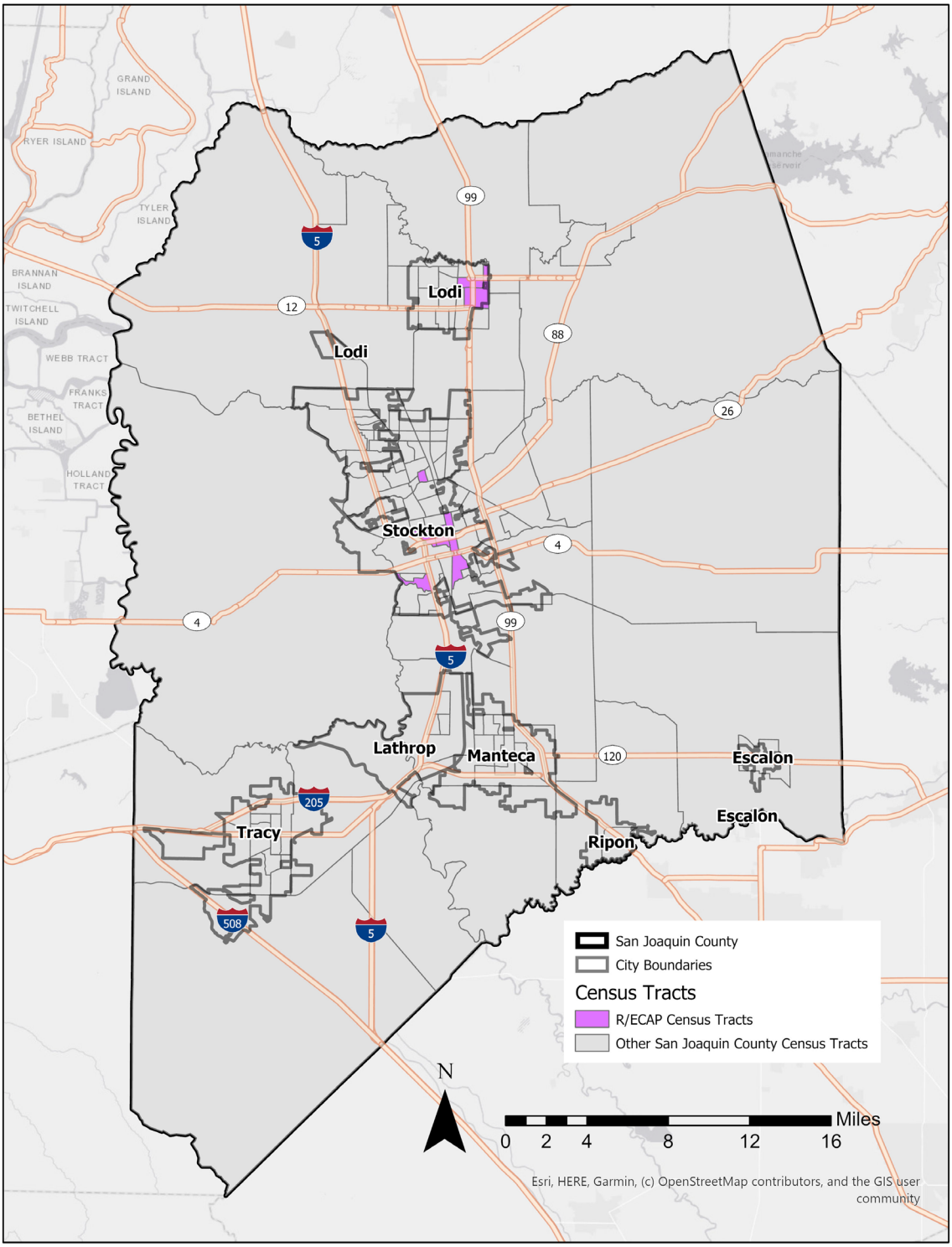
To assist communities in identifying racially and ethnically concentrated areas of poverty (also known as RCAPs and ECAPs), HUD developed a definition that relies on a racial and ethnic concentration threshold, as well as a poverty test. The racial and ethnic concentration threshold requires that an RCAP or ECAP (R/ECAP) have a non-White population of 50 percent or more. The poverty test defines areas of "extreme poverty" as those where 40 percent or more of the population lives at or below the federal poverty line, or those where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. As shown in Figure 9, this measure corresponds with findings in Figure 8, as the R/ECAP areas in the County are located in Stockton or Lodi. There are six R/ECAP Block Groups in Stockton, with four in the central and southern part of the city that are mostly contiguous. The two R/ECAP Block Groups in western Lodi (i.e., not within the Urban County) are also contiguous.

Figure 8: Percent of Population Living in Poverty, San Joaquin County, 2014-2018



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B19001 and B19013; BAE, 2020.

Figure 9: RCAP and ECAP Areas, San Joaquin County, 2014-2018



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B19001 and B19013; BAE, 2020.

2.5 – Special Needs Populations

Due to a variety of constraints, certain types of households often have greater difficulty locating suitable housing that both meets their needs and their budget. Various factors can contribute to a household's inability to locate suitable housing, such as the presence of elderly relatives or a household member's physical or mental handicap. The remainder of this subsection provides information regarding a number of subgroups or populations that often possess special housing needs, including seniors, large households, persons with disabilities, farmworkers, homeless persons, and persons diagnosed with AIDS and related diseases.

Seniors

Often living with fixed incomes, limited mobility, physical or mental impairments or disabilities, and numerous other constraints, seniors possess unique housing needs. For example, fixed incomes and often high health care costs can place a strain on household budgets, making affordability an important issue. Local service providers report that many seniors in the County spend the majority of their income on rents, leaving little money for other needs, and that many seniors have been given notices to end their tenancies because their landlords wanted to raise rents. Service providers and staff at some partner jurisdictions report an overall shortage of senior housing to meet the need in the County and long waiting lists for affordable senior units. With limited mobility, the design of housing units can significantly impact quality of life by making it easier or more difficult to enter and exit the unit, access kitchen and bathroom facilities, and access various parts of the unit, such as upstairs bedrooms.

As shown in Table 10, there are 23,668 households in the San Joaquin Urban County where the householder age is 65 years or over, representing 21.8 percent of all households. Of these households, 78.1 percent owned their home while 21.9 percent rented. Statewide, the householders of 23.3 percent of all households were aged 65 or over, and 73.0 percent of these owned their home.

Table 10: Households by Age of Householder and Tenure, San Joaquin Urban County and State of California, 2014-2018

	San Joaquin Urban County (a)					
	Owner Households		Renter Households		All Households	
Age of householder	Number	Percent	Number	Percent	Number	Percent
15 to 24 years	415	0.6%	2,126	5.4%	2,541	2.3%
25 to 34 years	6,108	8.9%	9,076	22.9%	15,184	14.0%
35 to 44 years	12,266	17.8%	9,822	24.8%	22,088	20.3%
45 to 54 years	15,364	22.3%	8,599	21.7%	23,963	22.1%
55 to 59 years	8,681	12.6%	2,418	6.1%	11,099	10.2%
60 to 64 years	7,637	11.1%	2,423	6.1%	10,060	9.3%
65 to 74 years	10,730	15.6%	3,071	7.7%	13,801	12.7%
75 to 84 years	5,561	8.1%	1,333	3.4%	6,894	6.3%
85 years and over	2,202	3.2%	771	1.9%	2,973	2.7%
Total, All Households	**68,964**	**100.0%**	**39,639**	**100.0%**	**108,603**	**100.0%**
Age 65 and Over	**18,493**	**26.8%**	**5,175**	**13.1%**	**23,668**	**21.8%**

	State of California					
	Owner Households		Renter Households		All Households	
Age of householder	Number	Percent	Number	Percent	Number	Percent
15 to 24 years	34,894	0.5%	347,040	5.9%	381,934	2.9%
25 to 34 years	530,922	7.5%	1,492,692	25.4%	2,023,614	15.6%
35 to 44 years	1,093,379	15.4%	1,343,103	22.8%	2,436,482	18.8%
45 to 54 years	1,541,350	21.8%	1,093,166	18.6%	2,634,516	20.3%
55 to 59 years	861,848	12.2%	429,533	7.3%	1,291,381	10.0%
60 to 64 years	816,637	11.5%	356,913	6.1%	1,173,550	9.1%
65 to 74 years	1,265,491	17.9%	459,036	7.8%	1,724,527	13.3%
75 to 84 years	662,212	9.3%	229,666	3.9%	891,878	6.9%
85 years and over	278,702	3.9%	128,851	2.2%	407,553	3.1%
Total, All Households	**7,085,435**	**100.0%**	**5,880,000**	**100.0%**	**12,965,435**	**100.0%**
Age 65 and Over	**2,206,405**	**31.1%**	**817,553**	**13.9%**	**3,023,958**	**23.3%**

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, B25007; BAE, 2020.

Furthermore, there are an estimated 42,692 residents of the San Joaquin Urban County who are 65 years or older. Of those senior residents, 8.3 percent reported incomes below the federal poverty level, compared to 91.7 percent that reported incomes at or above the federal poverty level. By comparison, 13.9 percent of California residents are aged 65 or older, and of them, 10.3 percent reported incomes below the federal poverty level.

Table 11: Population by Age and Poverty Status, San Joaquin Urban County and State of California, 2014-2018

	San Joaquin Urban County (a)					
	Below Poverty Level		At or Above Poverty Level		Total, All Persons	
Age Category	Number	Percent	Number	Percent	Number	Percent
Under 15 years	13,022	31.3%	66,237	21.3%	79,259	22.4%
15 to 24 years	6,212	14.9%	44,280	14.2%	50,492	14.3%
25 to 34 years	5,538	13.3%	39,605	12.7%	45,143	12.8%
35 to 44 years	5,524	13.3%	41,873	13.4%	47,397	13.4%
45 to 54 years	4,257	10.2%	43,672	14.0%	47,929	13.6%
55 to 64 years	3,548	8.5%	36,852	11.8%	40,400	11.4%
65 to 74 years	2,126	5.1%	23,257	7.5%	25,383	7.2%
75 years and over	1,420	3.4%	15,889	5.1%	17,309	4.9%
Total Population	**41,647**	**100.0%**	**311,665**	**100.0%**	**353,312**	**100.0%**
Age 65 and Over (b)	**3,546**	**8.5%**	**39,146**	**12.6%**	**42,692**	**12.1%**

	State of California					
	Below Poverty Level		At or Above Poverty Level		Total, All Persons	
Age Category	Number	Percent	Number	Percent	Number	Percent
Under 15 years	1,467,827	26.8%	5,951,870	18.1%	7,419,697	19.3%
15 to 24 years	1,037,895	18.9%	4,066,180	12.4%	5,104,075	13.3%
25 to 34 years	759,405	13.8%	5,053,485	15.4%	5,812,890	15.1%
35 to 44 years	639,506	11.7%	4,483,403	13.6%	5,122,909	13.3%
45 to 54 years	540,914	9.9%	4,566,308	13.9%	5,107,222	13.3%
55 to 64 years	506,106	9.2%	4,114,492	12.5%	4,620,598	12.0%
65 to 74 years	285,001	5.2%	2,748,026	8.3%	3,033,027	7.9%
75 years and over	250,487	4.6%	1,936,498	5.9%	2,186,985	5.7%
Total Population	**5,487,141**	**100.0%**	**32,920,262**	**100.0%**	**38,407,403**	**100.0%**
Age 65 and Over (b)	**535,488**	**9.8%**	**4,684,524**	**14.2%**	**5,220,012**	**13.6%**

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Percentage figure represents the percent of total persons age 65 and over.

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, B17001; BAE, 2020.

Persons with Disabilities

A variety of factors can influence housing choice for persons with disabilities, including the nature of the disability itself, among others. For example, persons with physical disabilities may face discrimination in the housing market due to biases and misperceptions about the use of adaptive equipment, such as wheelchairs and walkers. Additional issues can arise in instances when modifications or accommodations are necessary to improve or provide accessibility, when an owner or property manager is concerned over the possibility of damage being caused by the use of adaptive equipment (e.g., wheelchair), and/or when the property owner must provide reasonable accommodation for the use of a service animal, especially when the property would normally enforce a no pet policy. Not only do some landlords occasionally refuse to rent to prospective tenants with a history of mental illness, whole neighborhoods sometimes object to the establishment of group homes or supportive housing for persons with disabilities and/or mental illness. Some jurisdictions have also been known to apply restrictive permitting or zoning requirements to effectively deny or restrict the

provision of housing for persons with disabilities, especially in the case of cognitive impairments.

In the San Joaquin Urban County, there were an estimated 39,960 residents who reported having one or more disabilities in 2018. This includes 2,957 residents between the ages of 5 and 17, 20,261 residents between 18 and 65, and 16,592 aged 65 and over. Within the 18 to 64 age group, 47.9 reported an ambulatory difficulty, 41.7 reported a cognitive disability, and 31.0 reported an independent living difficulty.

Table 12: Persons with Disabilities by Age and Disability Type, San Joaquin Urban County and State of California, 2014-2018

	San Joaquin Urban County (a)		State of California	
Age Range and Disability Type	Number	Percent	Number	Percent
Persons With One or More Disabilities, Ages 5-17				
With a hearing difficulty	287	9.7%	34,495	12.4%
With a vision difficulty	509	17.2%	49,247	17.7%
With a cognitive difficulty	2,113	71.5%	203,691	73.0%
With an ambulatory difficulty	411	13.9%	37,579	13.5%
With a self-care difficulty	529	17.9%	65,253	23.4%
Subtotal: Ages 5-17 (b)	**2,957**	**n.a.**	**278,845**	**n.a.**
Persons With One or More Disabilities, Ages 18-64				
With a hearing difficulty	3,843	19.0%	365,440	18.5%
With a vision difficulty	3,877	19.1%	378,142	19.2%
With a cognitive difficulty	8,443	41.7%	848,097	43.0%
With an ambulatory difficulty	9,704	47.9%	910,628	46.2%
With a self-care difficulty	3,588	17.7%	377,584	19.1%
With an independent living difficulty	7,503	37.0%	742,808	37.7%
Subtotal: Ages 18-64 (b)	**20,261**	**n.a.**	**1,971,981**	**n.a.**
Persons With One or More Disabilities, Age 65+				
With a hearing difficulty	7,009	42.2%	729,069	40.0%
With a vision difficulty	2,658	16.0%	335,369	18.4%
With a cognitive difficulty	3,787	22.8%	513,300	28.2%
With an ambulatory difficulty	10,862	65.5%	1,179,156	64.7%
With a self-care difficulty	3,891	23.5%	508,816	27.9%
With an independent living difficulty	7,703	46.4%	879,053	48.2%
Subtotal: Ages 65 and over (b)	**16,592**	**n.a.**	**1,822,612**	**n.a.**
Total, All Ages (b) (c)	**39,960**		**4,089,685**	

Notes:
(a) San Joaquin Urban County comprises of City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Totals may be less than sum of list of disabilities since a person may have more than one disability.
(c) Figures may not sum to totals due to rounding.

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, S1810; BAE, 2020.

Large Households

HUD defines large households, and large family households, to include five or more members. Large households are often families with two or more children, or households that include extended family members, such as in-laws or grandparents. Large households are often

considered a special needs group due to the frequent undersupply of adequately sized and affordable housing units. Due to the higher costs associated with larger housing units, lower-income large households are typically more likely than other households to experience excessive housing costs. Most conventional apartment complexes also do not offer units with three or more bedrooms. Many multifamily developers dedicate only a small portion, if any, of the unit mix to units with three or more bedrooms, such as would be suitable for such families. If available, larger units can also cost substantially more to rent than smaller units. As a result, large households often occupy housing units that are smaller than would otherwise be suitable, which typically creates overcrowded conditions. Furthermore, families with children can face discrimination and differential treatment in the housing market, such as denying renting to families altogether, as well as requiring higher rent or security deposits and the imposition of special restrictions.

As summarized in Table 13, of the estimated 108,603 San Joaquin Urban County households in 2018, 17.3 percent were single-person households. By comparison, 62.7 percent were small multi-person households of two to four persons, and 19.9 percent (21,662 households) were large multi-person households with five or more persons. Most multi-person households are family households, representing 92.7 percent of smaller households, and 99.5 percent of larger households.

Table 13: Family and Non-Family Households by Size, San Joaquin Urban County and State of California, 2014-2018

	San Joaquin Urban County (a)		State of California	
Household Type	Number	Percent	Number	Percent
Single Person Households	18,816	17.3%	3,084,533	23.8%
Small Multi-Person Households (b)	68,125	62.7%	8,070,740	62.2%
Family	*63,139*	*58.1%*	*7,136,747*	*55.0%*
Non-Family	*4,986*	*4.6%*	*933,993*	*7.2%*
Large Multi-Person Households (c)	21,662	19.9%	1,810,162	14.0%
Family	*21,553*	*19.8%*	*1,778,481*	*13.7%*
Non-Family	*109*	*0.1%*	*31,681*	*0.2%*
Total, All Households	**108,603**	**100.0%**	**12,965,435**	**100.0%**

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Small multi-person households include households with two to four persons.
(c) Large multi-person households include households with five or more persons.

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, B11016; BAE, 2020.

As discussed in detail in Section 2.4, larger housing units with three or more bedrooms represent 74.5 percent of the 2018 housing stock in the San Joaquin Urban County, which suggests there is an adequate supply of larger units to accommodate them though it is worth noting that 67.9 percent of those units were owner-occupied, which is slightly higher than share of owner-occupied housing throughout the Urban County (63.5 percent). This indicates that while there is an adequate supply of larger units in total, there may be a modest

oversupply of large ownership units, accompanied by an undersupply of larger rental housing units.

Limited English Proficiency

Persons with a limited knowledge of the English language can often experience discrimination in housing due to racial, ethnic, or cultural bias. Due to their limited language abilities, these persons can also face unscrupulous leasing and lending practices that take advantage of their inability to read, interpret, and/or understand leasing agreements and loan documents. Persons with limited proficiency with the English language can also face difficulties once housing is secured, such as the difficulties with interpreting posted notices and correspondence. As a result, persons with limited English proficiency (LEP) are identified as a protected class under the Fair Housing Act, as well as applicable California law.

English is the only language spoken by 62.2 percent of San Joaquin Urban County residents, compared to 55.9 of residents in the State of California. Other than English, the most common primary language in the Urban County is Spanish, which is spoken by 26.0 percent of the population, compared to 5.9 percent that speak Other Indo-European languages, 5.4 percent that speak Asian and Pacific Island languages, and 0.6 percent that speak Other languages. Approximately 40.4 percent of Spanish speakers are persons with limited English proficiency (LEP), and Spanish-speaking households comprise 18.6 percent of Spanish-speaking households with LEP. This is comparable to the population of residents and households who speak Asian and Pacific Island languages, with 38.2 percent of persons reporting LEP and 15.6 percent of households. While 38.8 percent of Indo-European language speakers are persons with LEP, persons with LEP comprise 11.7 percent of such households.

Table 14: Population by Language Spoken at Home and Percent of Households with Limited English Proficiency, San Joaquin Urban County and State of California, 2014-2018

	San Joaquin Urban County (a)			
	Population by Primary Language Spoken (b)		Population with Limited English	Households with Limited English
Language Spoken	Number	Percent	Proficiency (c)	Proficiency (d)
Spanish	87,267	26.0%	40.4%	18.6%
Other Indo-European languages	19,900	5.9%	38.8%	11.7%
Asian and Pacific Island languages	18,002	5.4%	38.2%	15.6%
Other languages	2,049	0.6%	22.7%	7.3%
Total, All Non-English	**127,218**	**37.8%**	**39.6%**	**n.a.**
English Only	**208,994**	**62.2%**	**n.a.**	**n.a.**
Total, All Languages	**336,212**	**100.0%**	**15.0%**	6.5%

	State of California			
	Population by Primary Language Spoken (b)		Population with Limited English	Households with Limited English
Language Spoken	Number	Percent	Proficiency (c)	Proficiency (d)
Spanish	10,529,621	28.7%	40.4%	19.6%
Other Indo-European languages	1,641,520	4.5%	30.4%	15.6%
Asian and Pacific Island languages	3,636,258	9.9%	48.0%	26.6%
Other languages	373,611	1.0%	33.5%	17.7%
Total, All Non-English	**16,181,010**	**44.1%**	**40.9%**	**n.a.**
English Only	**20,487,071**	**55.9%**	**n.a.**	**n.a.**
Total, All Languages	**36,668,081**	**100.0%**	**18.1%**	**9.1%**

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Represents the population age five years and over by the primary language spoken at home.
(c) Percent of population age five years and over who does not speak English or speaks English less than "very well."
(d) Percent of households where no one age 14 and over speaks English only, or speaks English "very well."

Sources: U.S. Census Bureau, ACS 2018 five-year sample period, S1601, S1602; BAE, 2020,

Farmworkers

Farmworkers and day laborers are an essential component of the regional agricultural system and function as the foundation of a broader food industry cluster that includes growers, harvesters, processors, suppliers, and distribution firms. While many farmworkers are single male individuals, many also live with their families, often including extended family members. This poses a problem for these farmworkers because most rental units that are currently available specifically for migrant farmworkers are small and inadequate for housing large family households. Furthermore, farmworkers face distinctive housing challenges due to high poverty rates, large household sizes, linguistic isolation, and intimidation and fear due to immigration status. With these combined challenges, the farmworker community oftentimes does not have enough income to afford housing that meets their needs and thus must resort to the lowest cost and substandard housing. Local service providers report that farmworkers comprise a disproportionate share of the County's homeless population, underscoring the

extent of the housing affordability challenges for these workers. According to HCD, farmworker housing conditions are typically characterized by overcrowding, overpayment, substandard conditions, geographic isolation, and lack of access to transit, services, and shopping, as well as an above average risk for homelessness.

As shown in Table 15, the 2017 Census of Agriculture reports that there were about 12,097 migrant workers on 319 farms in San Joaquin County, with most typically requiring assistance securing affordable seasonal housing. The San Joaquin County General Plan Housing Element, and those of the other jurisdictions included in the Urban County, contain numerous policies and programs designed to address the needs of farmworkers, such as those identified above, including the provision of farmworker housing in agricultural zones. This includes the operation of farm labor housing projects and migrant labor centers, such as the Sartini Manor in Thornton, Harney Lane Migrant Center in Lodi, and the Joseph J. Artesi facility in French Camp. Though farm labor housing projects in the unincorporated county represent critical resources, many farmworker households still prefer to live in existing multi- and single-family rental housing in urban areas, which provide better access to amenities. For example, south Stockton reportedly features a relatively high concentration of farmworker households due to the presence of relatively low-cost housing and the neighborhood's relative proximity to nearby farmlands.

Table 15: Hired Farm Labor, San Joaquin County, 2017

	2017	
Hired Farm Labor	Number	Percent
Less than 150 days	11,738	59.5%
150 days or more	8,003	40.5%
Total, Hired Workers	**19,741**	**100%**
Number of Operations	*1,707*	

	2017	
Migrant Farm Labor	Number	Percent
Hired labor	9,297	76.9%
Contract labor only	2,800	23.1%
Total, Migrant Workers	**12,097**	**100%**
Number of Operations	*319*	

Sources: U.S. Census of Agriculture, 2017; BAE, 2020.

Persons Diagnosed with AIDS and Related Diseases

Due largely to popular misconceptions, persons living with HIV and AIDS, and their families, can often be subject to housing discrimination. Though no reliable statistics exist regarding the amount of housing discrimination that occurs within this population in the local area, the available statistics from the California Department of Public Health's 2018 HIV Surveillance Report indicate that there were approximately 136,566 persons living in California living with diagnosed HIV infection in 2018, which is an 8.0 percent increase from about 126,372 in

2014. San Joaquin County faced a lower increase of 3.7 percent during the same time frame, increasing from 1,312 persons in 2014 to 1,361 persons in 2018.

Homeless Persons

HUD generally defines homeless persons as those who lack fixed, regular, and adequate nighttime residence, as well as those residing in shelters or places not designed as regular sleeping accommodations. Most individuals and families become homeless because they are unable to afford housing in a particular community. A local provider of housing for persons experiencing homelessness reports that many homeless persons in the county are employed, many of them farmworkers as noted above, while many others have issues with mental illness that prevent them from finding and keeping employment. Local housing providers also report community opposition to developing housing for formerly homeless individuals. Single adults typically comprise the majority of the homeless population, who enter and exit the social support network fairly quickly. The remainder include homeless adults and families who remain a part of the homeless assistance system over long periods of time, primarily residing in shelters and on the street. Though representing a minority of the overall homeless population, unaccompanied minors represent an important and vulnerable sub-population.

Table 16 shows the estimated number of unsheltered and sheltered homeless individuals and families located within the City of Tracy, City of Manteca and unincorporated San Joaquin County. An authorized Continuum of Care (CoC) representative provided the data, which was originally collected through the 2019 Point-in-Time Count (PITC). According to these data, there were 255 unsheltered homeless individuals in the Urban County, of whom 249 were adults. Approximately 80.4 percent of unsheltered homeless individuals were White, although 74.9 percent were Non-Hispanic/Latino. In addition, in Tracy and Manteca, there were 45 homeless individuals in emergency shelters and 16 in transitional housing. Among these sheltered homeless individuals, 38 people, or 62.3 percent, were children and either White or multi-racial.

Table 16: Sheltered and Unsheltered Homeless by Population Type, San Joaquin Urban County, 2019

	Unsheltered (a)		Sheltered			
			Emergency		Transitional	
Age Group	Number	Percent	Number	Percent	Number	Percent
Adults	249	97.6%	17	37.8%	6	37.5%
Children	6	2.4%	28	62.2%	10	62.5%
Unknown	0	0.0%	0	0.0%	0	0.0%
Total, All Ages	**255**	**100%**	**45**	**100%**	**16**	**100%**
Racial Group						
American Indian	3	1.2%	0	0.0%	0	0.0%
Asian	2	0.8%	0	0.0%	0	0.0%
African American	17	6.7%	0	0.0%	0	0.0%
Pacific Islander	10	3.9%	0	0.0%	1	6.3%
White	205	80.4%	44	97.8%	10	62.5%
Multi-Racial	16	6.3%	0	0.0%	5	31.3%
Unknown	1	0.4%	1	2.2%	0	0.0%
Total, All Racial Groups	**255**	**100%**	**45**	**100%**	**16**	**100%**
Ethnic Group						
Non-Hispanic/Latino	191	74.9%	12	26.7%	10	62.5%
Hispanic/Latino	63	24.7%	30	66.7%	6	37.5%
Unknown	1	0.4%	3	6.7%	0	0.0%
Total, All Ethnic Groups	**255**	**100%**	**45**	**100%**	**16**	**100%**

Notes:
(a) The unsheltered count includes general outreach figures from City of Tracy, City of Manteca, and unincorporated San Joaquin County.
(b) The emergency shelter and transitional housing shelter figures include shelters from City of Tracy and City of Manteca.

Sources: City of Tracy, City of Manteca, Unincorporated San Joaquin County, and San Joaquin County Continuum of Care, Point-In-Time Count, 2019; BAE, 2020.

2.6 – Housing Profile

The following section provides an overview of the characteristics of the local and regional housing markets, including the nature and condition of the existing housing stock, estimated occupancy and vacancy rates, and the cost of housing. For the purposes of this analysis, a housing unit is defined to include a house, apartment, mobile home, group of rooms, or single room that is occupied or intended for occupancy as a separate and independent living space.

Housing Stock Characteristics

As shown in Table 17, there were approximately 114,532 housing units in the San Joaquin Urban County in 2018. Between 2010 and 2018, the most common housing unit type, detached single-family structures, increased as a share of the overall number of housing units from 81.2 percent to 82.2 percent. However, the overall number of attached single-family structures decreased from 3,709 to 2,987, a decline of 19.5 percent. Not only does the share of detached single-family units far exceed the rate statewide, but also, between 2010 and 2018, the share of detached single-family units increased by 1.1 percentage points while falling 0.2 percent overall in California.

The fastest growing unit type between 2010 and 2018 was multifamily structures with five or more units, the number of which grew by 16.2 percent to 6,753 total units in 2018. Although the number of structures with two to four units increased overall, there was no change in the proportion of these units (3.6 percent) compared to the housing stock as a whole. Mobile homes represented 6.1 percent of Urban County housing units in 2010, making them the most common housing type after single-family detached structures. The number of mobile homes in 2018 declined by 4.9 percent compared to 2010, to represent 5.5 percent of broader housing stock. Multifamily structures with five or more units have now surpassed mobile homes as the second most common housing type after single-family detached units, reflecting the community's progress towards development of additional multifamily rental housing.

Table 17: Housing Stock Characteristics, San Joaquin Urban County and State of California, 2010-2018

	San Joaquin Urban County (a)			
	2010		2018	
Units in Structure	Number	Percent	Number	Percent
Detached Single Family	88,432	81.2%	94,091	82.2%
Attached Single Family	3,709	3.4%	2,987	2.6%
2 to 4 units	3,925	3.6%	4,116	3.6%
5 or more units	5,811	5.3%	6,753	5.9%
Mobile Homes	6,673	6.1%	6,345	5.5%
Boats, RV's, Vans, Other	312	0.3%	240	0.2%
Total, All Housing Units	**108,862**	**100.0%**	**114,532**	**100.0%**

	State of California			
	2010		2018	
Units in Structure	Number	Percent	Number	Percent
Detached Single Family	7,877,273	58.1%	8,157,883	57.9%
Attached Single Family	957,348	7.1%	991,403	7.0%
2 to 4 units	1,105,402	8.2%	1,122,070	8.0%
5 or more units	3,061,556	22.6%	3,278,223	23.3%
Mobile Homes	533,975	3.9%	520,262	3.7%
Boats, RV's, Vans, Other	17,070	0.1%	14,983	0.1%
Total, All Housing Units	**13,552,624**	**100.0%**	**14,084,824**	**100.0%**

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, ACS 2010 five-year and 2018 five-year sample period, B25024; BAE, 2020.

Larger housing units of three or more bedrooms represent 74.5 percent of the 2018 housing stock in the San Joaquin Urban County, and 86.1 percent of all owner-occupied units. Although a greater share of renter-occupied units has between zero and two bedrooms compared to owner-occupied units, 54.5 percent of renter-occupied units have three or more bedrooms. This indicates that smaller owner and renter households requiring studios and one-bedroom units likely lack housing options, which may present a barrier to fair housing choice. As a result, many smaller, lower-income households reside within housing units that are larger than would otherwise be necessary to meet their needs, which contributes to the

high prevalence of excessive housing costs among lower income households. In some cases, lower income households are known to group together in order to better afford the costs associated with renting or purchasing larger housing units, which constitute most of the citywide housing stock. This may, in some cases, contribute to incidences of overcrowding, which has been identified as a common housing problem experienced by lower-income households.

Table 18: Housing Units by Size and Tenure, San Joaquin Urban County and State of California, 2006-2010 and 2014-2018

	San Joaquin Urban County (a)				State of California			
	2010		2018		2010		2018	
Occupied Housing Units by Bedrooms	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Owner Occupied								
No Bedroom	255	0.3%	221	0.2%	29,450	0.2%	46,883	0.4%
1 Bedroom	1,208	1.2%	1,023	0.9%	196,639	1.6%	174,260	1.3%
2 Bedroom	9,639	9.5%	8,343	7.7%	1,388,341	11.2%	1,289,152	9.9%
3 Bedroom	33,308	33.0%	31,359	28.9%	3,222,396	26.0%	3,168,810	24.4%
4 Bedroom	20,161	20.0%	21,376	19.7%	1,809,849	14.6%	1,903,525	14.7%
5 Bedroom or More	5,965	5.9%	6,642	6.1%	465,375	3.8%	502,805	3.9%
Subtotal, Owner Occupied	**70,536**	**69.9%**	**68,964**	**63.5%**	**7,112,050**	**57.4%**	**7,085,435**	**54.6%**
Renter Occupied								
No Bedroom	497	0.5%	853	0.8%	342,212	2.8%	458,846	3.5%
1 Bedroom	4,043	4.0%	4,453	4.1%	1,535,827	12.4%	1,521,623	11.7%
2 Bedroom	11,788	11.7%	12,749	11.7%	2,071,371	16.7%	2,235,086	17.2%
3 Bedroom	10,160	10.1%	14,815	13.6%	996,943	8.0%	1,215,763	9.4%
4 Bedroom	3,189	3.2%	5,891	5.4%	277,400	2.2%	376,478	2.9%
5 Bedroom or More	769	0.8%	878	0.8%	57,049	0.5%	72,204	0.6%
Subtotal, Renter Occupied	**30,446**	**30.1%**	**39,639**	**36.5%**	**5,280,802**	**42.6%**	**5,880,000**	**45.4%**
Total, All Households	**100,982**	**100.0%**	**108,603**	**100.0%**	**12,392,852**	**100.0%**	**12,965,435**	**100.0%**

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: US Census Bureau, ACS 2010 and 2018 five-year sample period, B25042; BAE, 2020.

Notably, the share of units constructed after 2010 in the San Joaquin Urban County is 5.2 percent, compared to 2.7 percent statewide, which suggests the Urban County's housing market has been relatively strong since the financial crisis compared to the state overall.

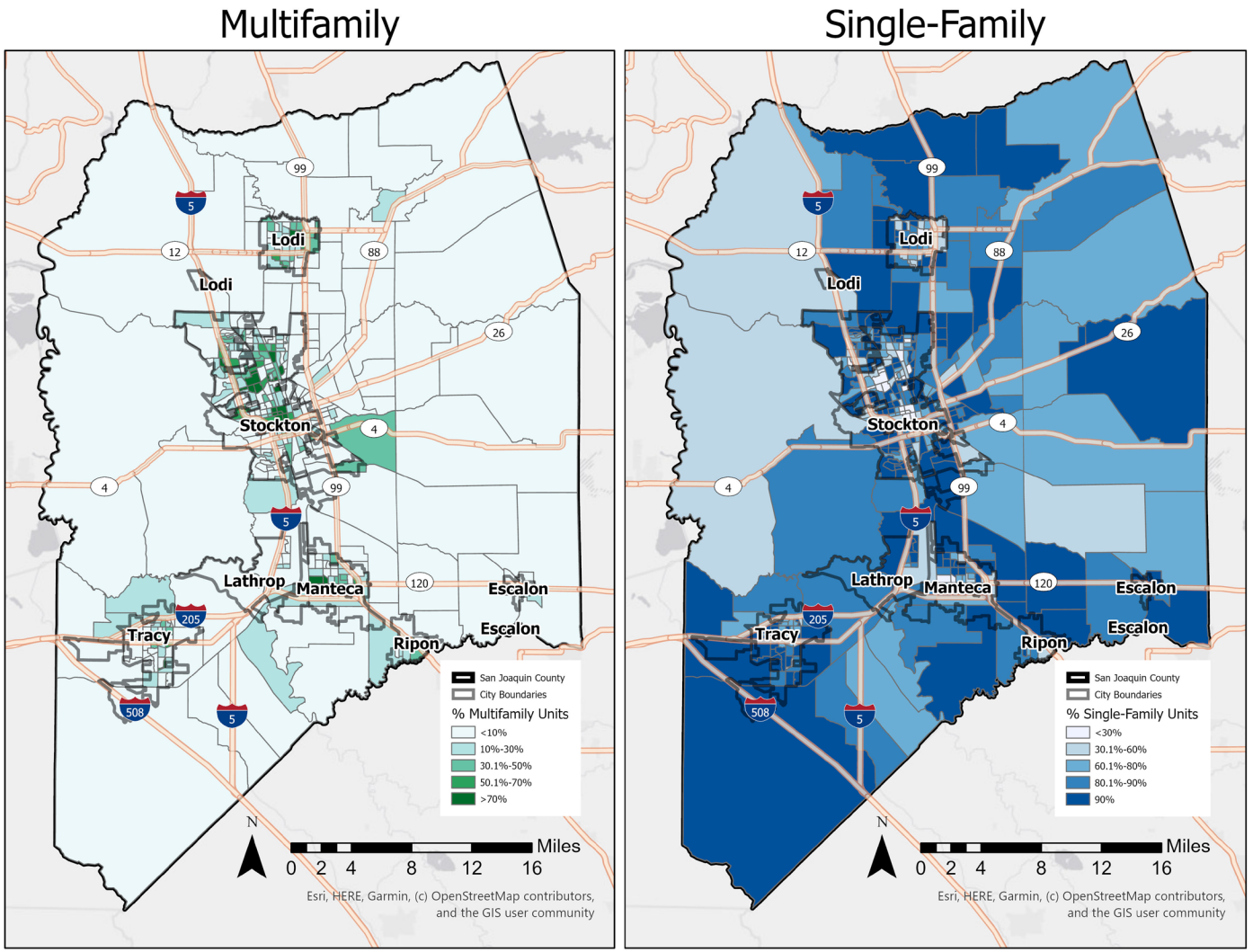
Table 19: Housing Units by Year Built, San Joaquin Urban County and State of California, 2014-2018

	San Joaquin Urban County (a)		State of California	
Year Built	Number	Percent	Number	Percent
1939 or earlier	5,588	4.9%	1,299,679	9.2%
1940 to 1949	6,480	5.7%	849,660	6.0%
1950 to 1959	12,307	10.7%	1,900,467	13.5%
1960 to 1969	9,702	8.5%	1,892,586	13.4%
1970 to 1979	14,498	12.7%	2,488,636	17.7%
1980 to 1989	16,146	14.1%	2,135,838	15.2%
1990 to 1999	17,400	15.2%	1,536,758	10.9%
2000 to 2009	26,400	23.1%	1,598,759	11.4%
2010 to 2013	3,438	3.0%	230,279	1.6%
2014 or later	2,573	2.2%	152,162	1.1%
Total, All Housing Units	**114,532**	**100.0%**	**14,084,824**	**100.0%**

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, ACS 2018 five-year sampling period, B25034; BAE, 2019.

Figure 10: Percent of Housing Units by Type, San Joaquin County, 2014-2018



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B25024; BAE, 2020.

Lead-Based Paint Hazards

Lead-based paints were banned from use in 1978. As a result, most housing units constructed prior to 1980 could pose a potential lead-based paint hazard. As shown in Table 19 above, approximately 48,575 housing units, or 59.9 percent of the San Joaquin Urban County housing stock, were constructed prior to 1980. Housing units constructed prior to 1940 are especially considered at risk for lead-based paint hazard due to their advanced age and the frequent utilization of lead-based paint towards the beginning of the century.

Since children are most at risk for lead-based paint exposure, households living in units constructed prior to 1980 with children present are considered some of the highest risk. While not directly comparable to the data presented in Table 19 due to the different study periods and data sources, CHAS data presented in Table 20 indicate that approximately 8.1 percent of the Urban County housing stock was constructed prior to 1980 and was occupied by households that included children. Renter-occupied housing is more likely to have been constructed prior to 1980 and contain children and is also more likely to house lower income households due to the lower costs associated with older, less well-maintained housing.

Table 20: Risk of Lead Based Paints by Income Category, San Joaquin Urban County

	San Joaquin Urban County (a)					
	Owner-Occupied		Renter-Occupied		All Households	
Housing Units built before 1980 with children present (b)	Number	Percent	Number	Percent	Number	Percent
Extremely Low Income (30% of HAMFI or Less)	160	5.4%	910	16.1%	1,070	12.4%
Very Low Income (30% to 50% of HAMFI)	300	10.1%	1,285	22.7%	1,585	18.4%
Low Income (50% to 80% of HAMFI)	440	14.9%	1,540	27.3%	1,980	23.0%
Moderate Income (80% to 100% of HAMFI)	380	12.8%	695	12.3%	1,075	12.5%
Above Moderate Income (Above 100% of HAMFI)	1,680	56.8%	1,220	21.6%	2,900	33.7%
All Income Levels (c)	**2,960**	**100.0%**	**5,650**	**100.0%**	**8,610**	**100.0%**
All Housing Units	**66,600**		**39,245**		**105,845**	

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) The age of children is defined as age six or younger.
(c) Totals do not equal the sum of individual figures due to independent rounding.

Sources: U.S. Department of Housing and Urban Development (HUD), 2012-2016 CHAS data; BAE, 2020.

Household Tenure

In line with statewide trends, the number and overall share of owner-occupied units in the San Joaquin Urban County declined between 2010 and 2014, from 69.9 percent of all households to 63.5 percent. Renter households, as a result, increased from 30.1 percent to 36.5 percent of all Urban County households. In California, the percentage of owner households fell from 57.4 percent to 54.6 percent, with a corresponding increase in renter-occupied households. Figure 11 shows that Block Groups with the highest concentrations of renter-occupied housing are in the urban centers, particularly in southern Stockton. The Block Group on the western edge of the County shows a high rate of renter-occupied units (60 to 70 percent) compared to

other unincorporated areas, which may reflect the farmworker population that resides in the area.

Table 21: Occupied Housing Units by Tenure, San Joaquin Urban County and State of California, 2006-2010 and 2014-2018

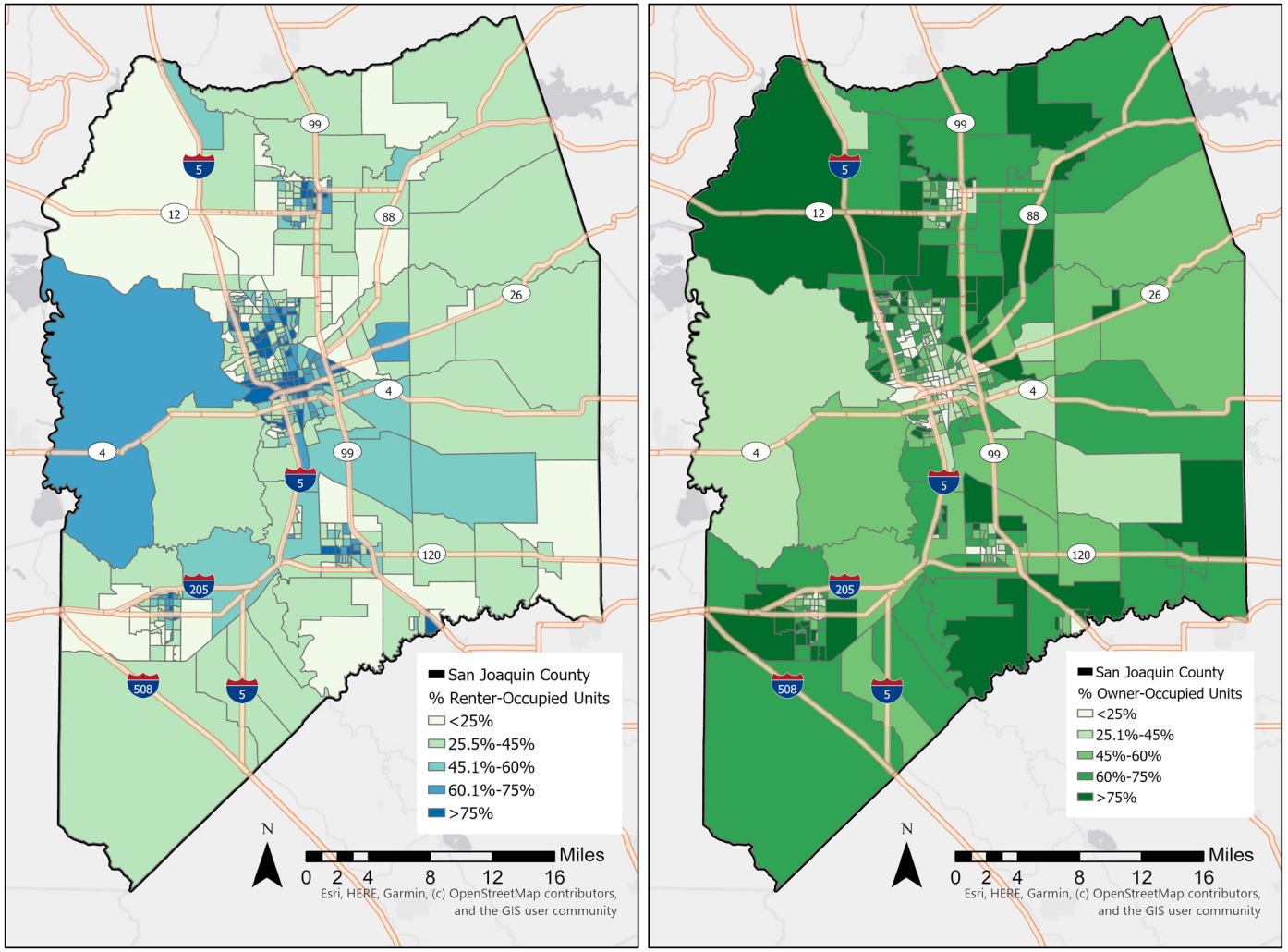
	San Joaquin Urban County (a)			
	2010		2018	
Tenure	Number	Percent	Number	Percent
Owner Occupied	70,536	69.9%	68,964	63.5%
Renter Occupied	30,446	30.1%	39,639	36.5%
Total, All Households	**100,982**	**100.0%**	**108,603**	**100.0%**

	State of California			
	2010		2018	
Tenure	Number	Percent	Number	Percent
Owner Occupied	7,112,050	57.4%	7,085,435	54.6%
Renter Occupied	5,280,802	42.6%	5,880,000	45.4%
Total, All Households	**12,392,852**	**100.0%**	**12,965,435**	**100.0%**

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: U.S. Census Bureau, ACS 2010 five-year and 2018 five-year sample period, B25003; BAE, 2020.

Figure 11: Percent of Occupied Housing Units by Tenure, San Joaquin County, 2014-2018



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B25003; BAE, 2020.

Occupancy/Vacancy Status

Since 2010, the number of vacant housing units fell from 7.2 percent to 5.2 percent in 2018. While residential vacancy may have been more recently impacted by the effect of the COVID-19 pandemic, no data are currently available that reflects the impact of those trends, including the resulting change in residential vacancy. Despite an overall increase in the housing stock of 5,670 units between 2010 and 2018, the number of vacant units in the San Joaquin Urban County decreased by 1,951, signaling relatively strong absorption of newly developed housing. Decreasing vacancy may, over time, translate to decreased affordability.

Table 22: Occupancy and Vacancy Status, San Joaquin Urban County and State of California, 2010-2018

	San Joaquin Urban County (a)			
	2010		2018	
Occupancy Status	Number	Percent	Number	Percent
Occupied Housing Units	100,982	92.8%	108,603	94.8%
Vacant Housing Units	7,880	7.2%	5,929	5.2%
For rent	*1,306*	1.2%	*967*	0.8%
For sale only	*255*	0.2%	*267*	0.2%
Rented or sold, not occupied	*1,015*	0.9%	*1,494*	1.3%
For seasonal or occasional use	*2,208*	2.0%	*458*	0.4%
For migrant workers	*77*	0.1%	*100*	0.1%
Other vacant (b)	*2,451*	*2.3%*	*2,167*	*1.9%*
Total, All Housing Units	**108,862**	**100.0%**	**114,532**	**100.0%**

	State of California			
	2010		2018	
Occupancy Status	Number	Percent	Number	Percent
Occupied Housing Units	12,392,852	91.4%	12,965,435	92.1%
Vacant Housing Units	1,159,772	8.6%	1,119,389	7.9%
For rent	*283,159*	2.1%	*217,600*	1.5%
For sale only	*59,974*	0.4%	*59,317*	0.4%
Rented or sold, not occupied	*108,318*	0.8%	*112,207*	0.8%
For seasonal or occasional use	*162,557*	1.2%	*83,128*	0.6%
For migrant workers	*2,706*	0.0%	*3,312*	0.0%
Other vacant (b)	*286,298*	*2.1%*	*314,915*	*2.2%*
Total, All Housing Units	**13,552,624**	**100.0%**	**14,084,824**	**100.0%**

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) If a vacant unit does not fall into any of the classifications specified above, it is classified as "other vacant." For example, this category includes units held for occupancy by a caretaker or janitor and units held by the owner for personal reasons.

Sources: U.S. Census Bureau, ACS 2010 five-year and 2018 five-year sample period, B25004; BAE, 2020

Housing Prices

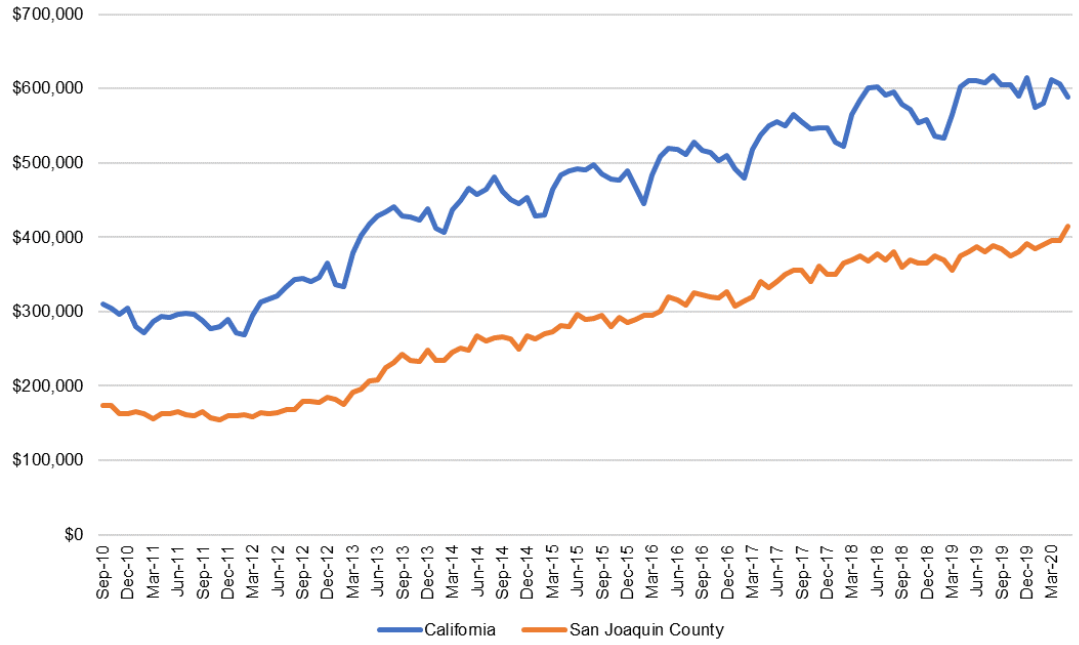
Between 1998 and 2009, San Joaquin County experienced a dramatic boom and bust cycle in the housing market. Driven by robust local growth, and housing demand from households commuting into the San Francisco Bay Area for work, as well as by widespread sub-prime mortgage lending activity, the median home price in San Joaquin County escalated rapidly, more than doubling between January 2002 and June 2006, according to the California Association of Realtors (CAR). As of June 2006, the median home price in the County had

reached a high of $426,829, but by April 2009, the median single-family home price had fallen to $147,053. Though similar trends were experienced throughout California and the nation, San Joaquin County was among the markets most severely impacted by the rapid change in sales prices and the surge in foreclosures and other distressed sales. Figure 12 illustrates these trends, based on median single-family home sales data provided by CAR for the period from September 2010 to May 2020.

Since the end of the housing crisis, CAR reports that the median home price in San Joaquin County has recovered somewhat, increasing from $160,000 in August 2009, to $415,000 in May of 2020, representing an increase of $255,000, or 159.4 percent. Similarly, whereas the California Association of Realtors (CAR) reported that as of January 2009, approximately 90 percent of all home sales in San Joaquin County were distressed, the organization has discontinued their tracking of distressed sales due to the exceedingly low volume of such transactions in the current market.

Additional data provided by private data vendor CoreLogic, as shown in Figure 12 indicate that the median single-family sales price in the Urban County was $415,000 in May 2020, including both new and resale units. Examining the most recent data, as presented in Table 23, reveals that during the first quarter of 2020, the median price of 1,010 sold units was even higher, at $470,000. Based on standard industry loan terms, the purchase of a median-priced unit during first quarter of 2020 would require an annual household income of approximately $114,419. Compared to the existing distribution of households by income in 2018, discussed earlier, the median priced for-sale unit would likely be unaffordable to at least 65.3 percent of San Joaquin Urban County households.

Figure 12: Median Single-Family Sales Price Trends, San Joaquin County and Urban County Member Cities, Sep 2010 through May 2020



Sources: California Association of Realtors, 2019; BAE, 2019.

Table 23: Median Sales Price by Unit Size and Associated Income Requirements, San Joaquin Urban County and State of California

			Home Ownership Cost Assumptions (b)						
Unit Size	**# of Sales**	**Median Price**	Downpayment/ Upfront Insurance	Principal and Interest	Mortgage Insurance	Property Taxes	Property Insurance	Monthly Payment	**Income Requirement**
1 Bedroom	2	$274,500	$14,411	$1,172	$194	$260	$44	$1,671	$66,826
2 Bedroom	72	$395,000	$20,738	$1,686	$280	$375	$63	$2,404	$96,161
3 Bedroom	439	$425,000	$22,313	$1,814	$301	$403	$68	$2,587	$103,464
4 Bedroom	379	$518,000	$27,195	$2,211	$367	$491	$83	$3,153	$126,105
5+ Bedroom	118	$577,500	$30,319	$2,465	$409	$548	$92	$3,515	$140,590
All Sizes	1010	$470,000	$24,675	$2,006	$333	$446	$75	$2,860	$114,419

Notes:
(a) Includes single-family residence, duplex, triplex, quadruplex, and townhouse properties with last market sales dates between January 1, 2020 and June 30, 2020.

(b) Home ownership cost assumptions include:

% of income for housing costs	30%	of gross annual income
Down payment	3.50%	of home value
Annual interest rate	3.38%	fixed
Loan term	30	years
Upfront mortgage insurance	1.75%	of home value
Annual mortgage insurance	0.85%	of mortgage
Annual property tax rate	1.14%	of home value
Annual hazard insurance	0.19%	of home value

(c) Annual hazard insurance rate is based on quoted insurance premiums from the Homeowners Premium Survey, published by the California Department of Insurance, for a home valued at $500,000.

Sources: ListSource, 2020; San Joaquin County, 2020; California Department of Insurance, 2020; BAE, 2020.

Residential Rents

The average monthly rent for market rate, multifamily units of all sizes in the San Joaquin Urban County is $1,601, based on first quarter 2020 data from the private vendor, CoStar. This is comparable to the $1,609 average monthly rent for two-bedroom units. Studios and one-bedroom units are the most affordably priced and comprise 14.4 percent of all market-rate multifamily units, as shown in Table 24. Two-bedroom units are the most common, representing 48.3 percent of all units. Table 24 also shows the incomes required to rent the different sized units based on the assumption that households spend no more than 30 percent of their income on rent and utilities. Required incomes range from $33,040 for Studios, to $77,440 for units of four bedrooms or larger. Compared to the 2018 household income distribution within the Urban County, up to 49.9 percent of households would be unable to afford these rents. Moreover, even though 74.5 percent of households live in units of three bedrooms or more, 34.7 percent of households have insufficient incomes to afford multifamily rentals of three bedrooms or more.

Table 24: Rental Market Overview, San Joaquin Urban County, and State of California, Q2 2020

Unit Size	Total Units (b)	Average Square Footage	Average Rent	Average Rent per Square Foot	Utility Allowance	Required Income
Studio	817	594	$748	$1.99	$78	$33,040
1 Bedroom	2,709	638	$1,423	$2.15	$93	$60,640
2 Bedroom	4,114	911	$1,609	$1.74	$122	$69,240
3 Bedroom	870	1,232	$2,315	$1.87	$152	$98,680
4 or more Bedroom	6	1,453	$1,750	$0.88	$186	$77,440
Total, All Units	**8,516**	**827**	**$1,601**	**$1.85**	**$112**	**$68,501**

Notes:
(a) San Joaquin Urban County comprises of City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Total units include only market rate multifamily units.

Sources: CoStar, 2020; San Joaquin Housing Authority, 2019; BAE, 2020.

Overpayment

According to HUD standards, a household is considered “cost burdened” (i.e., overpaying for housing), if it spends more than 30 percent of gross income on housing-related costs. Households are “severely cost burdened” if they pay more than 50 percent of their income for housing costs. Table 25 presents a breakdown of the prevalence of overpayment among households with incomes equal to, or less than, 80 percent the area median. According to these data, 8.6 percent of Small-Related and 3.5 percent of Large-Related households earning up to 80 percent AMI in the Urban County are cost burdened or severely cost burdened. This trails the prevalence of such cost burdened households statewide. However, elderly households with incomes up to 80 percent AMI in the Urban County are cost burdened at a higher rate than in California as a whole. In California, 8.4 percent of elderly households were cost burdened, compared to 9.8 percent in the Urban County. Overall, 43.5 of Urban County

households with incomes up to 80 percent AMI were cost burdened or severely cost burdened, compared to 56.5 percent in California.

Table 25: Households Overpaying for Housing by Tenure and Type, San Joaquin Urban County and State of California, 2012-2016

	Owner-Occupied Households							
	0-30% AMI		30-50% AMI		50-80% AMI		All Household (b)	
Household Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Small Related	745	2.1%	795	2.2%	1,525	4.3%	3,065	8.6%
Cost Burden (c)	*120*	*0.3%*	*260*	*0.7%*	*770*	*2.2%*	*1,150*	*3.2%*
Severe Cost Burden (d)	*625*	*1.8%*	*535*	*1.5%*	*755*	*2.1%*	*1,915*	*5.4%*
Large Related	175	0.5%	310	0.9%	765	2.1%	1,250	3.5%
Cost Burden (c)	*65*	*0.2%*	*110*	*0.3%*	*555*	*1.6%*	*730*	*2.0%*
Severe Cost Burden (d)	*110*	*0.3%*	*200*	*0.6%*	*210*	*0.6%*	*520*	*1.5%*
Elderly (f)	1,070	3.0%	1,175	3.3%	1,260	3.5%	3,505	9.8%
Cost Burden (c)	*150*	*0.4%*	*525*	*1.5%*	*560*	*1.6%*	*1,235*	*3.5%*
Severe Cost Burden (d)	*920*	*2.6%*	*650*	*1.8%*	*700*	*2.0%*	*2,270*	*6.4%*
Other	425	1.2%	360	1.0%	275	0.8%	1,060	3.0%
Cost Burden (c)	*120*	*0.3%*	*125*	*0.4%*	*90*	*0.3%*	*335*	*0.9%*
Severe Cost Burden (d)	*305*	*0.9%*	*235*	*0.7%*	*185*	*0.5%*	*725*	*2.0%*
No Cost Burden	430	1.2%	1,805	5.1%	3,905	11.0%	6,140	17.2%
Cost not computed	465	1.3%	0	0.0%	0	0.0%	465	1.3%
Subtotal, Owner Households Earning up to 80% AMI (e)	**3,305**	**9.3%**	**4,455**	**12.5%**	**7,730**	**21.7%**	**15,490**	**43.5%**

	Renter-Occupied Households							
	0-30% AMI		30-50% AMI		50-80% AMI		All Household (b)	
Household Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Small Related	2,375	6.7%	2,110	5.9%	2,075	5.8%	6,560	18.4%
Cost Burden (c)	*50*	*0.1%*	*780*	*2.2%*	*1,590*	*4.5%*	*2,420*	*6.8%*
Severe Cost Burden (d)	*2,325*	*6.5%*	*1,330*	*3.7%*	*485*	*1.4%*	*4,140*	*11.6%*
Large Related	690	1.9%	1,020	2.9%	1,250	3.5%	2,960	8.3%
Cost Burden (c)	*85*	*0.2%*	*635*	*1.8%*	*965*	*2.7%*	*1,685*	*4.7%*
Severe Cost Burden (d)	*605*	*1.7%*	*385*	*1.1%*	*285*	*0.8%*	*1,275*	*3.6%*
Elderly (f)	975	2.7%	1,220	3.4%	785	2.2%	2,980	8.4%
Cost Burden (c)	*80*	*0.2%*	*410*	*1.2%*	*400*	*1.1%*	*890*	*2.5%*
Severe Cost Burden (d)	*895*	*2.5%*	*810*	*2.3%*	*385*	*1.1%*	*2,090*	*5.9%*
Other	745	2.1%	700	2.0%	980	2.7%	2,425	6.8%
Cost Burden (c)	*0*	*0.0%*	*280*	*0.8%*	*800*	*2.2%*	*1,080*	*3.0%*
Severe Cost Burden (d)	*745*	*2.1%*	*420*	*1.2%*	*180*	*0.5%*	*1,345*	*3.8%*
No Cost Burden	726	2.0%	1,075	3.0%	2,835	8.0%	4,636	13.0%
Cost not computed	586	1.6%	0	0.0%	0	0.0%	586	1.6%
Subtotal, Renter Households Earning up to 80% AMI (e)	**6,085**	**17.1%**	**6,145**	**17.2%**	**7,925**	**22.2%**	**20,155**	**56.5%**
Total, Households Earning up to 80% AMI (b)	**9,390**	**26.3%**	**10,600**	**29.7%**	**15,655**	**43.9%**	**35,645**	**100%**

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Includes all households with incomes at or below the 80% of the area median income.
(c) Housing costs greater than 30% and less than 50% of gross income.
(d) Housing costs greater than 50% of gross income.
(e) Totals do not equal the sum of individual figures due to independent rounding.
(f) The elderly household type includes elderly non-family households and family households with two persons that are either or both age 62 or over.

Sources: U.S. Department of Housing and Urban Development (HUD), 2012-2016 CHAS data; BAE, 2020.

Other Housing Problems

In addition to overpayment (including severe overpayment), HUD reports data on the relative prevalence of a variety of housing problems, including overcrowding and substandard housing. Overcrowding is defined as the condition of having more than one person per room in a residence, excluding bathrooms, porches, foyers, halls, or half-rooms. Severe overcrowding is defined as the condition of having more than 1.5 persons per room. Substandard housing

conditions exist when a housing unit lacks hot and cold piped water, and/or a flush toilet and a bathtub or shower; and/or kitchen facilities that lack a sink with piped water, and/or a range, stove, or refrigerator. According to data reported in Table 26, the most common problems are Severe Housing Cost Burden and Housing Cost Burden, representing 30.8 percent and 24.6 percent of all problems, respectively. After cost burdens, the most common problem is overcrowding, which accounts for 7.5 percent of all reported housing problems. According to these data, 25,280 households earning up to 80 percent of the Area Median Income (AMI) and are either cost burdened or severely cost burdened. This represents 23.3 percent of all San Joaquin Urban County households, including 10,795 owner households and 14,485 renter households. Notably, 23.6 percent of severe housing cost burden cases are experienced by owner and renter households with incomes 30 percent of the AMI or below.

Table 26: Housing Problems by Tenure and Type, San Joaquin Urban County, 2012-2016

	Owner-Occupied Households									
	0-30% AMI		30-50% AMI		50-80% AMI		80-100% AMI		All Households (b)	
Housing Problem Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Substandard Housing (c)	10	0.0%	10	0.0%	30	0.1%	65	0.1%	115	0.3%
Severly Overcrow ded (d)	41	0.1%	21	0.0%	60	0.1%	60	0.1%	182	0.4%
Overcrow ded (e)	120	0.3%	225	0.5%	440	1.0%	270	0.6%	1,055	2.3%
Severe Housing Cost Burden (f)	1,890	4.1%	1,565	3.4%	1,780	3.9%	660	1.4%	5,895	12.9%
Housing Cost Burden (g)	385	0.8%	975	2.1%	1,805	4.0%	1,735	3.8%	4,900	10.7%
Zero/Negative Income	460	1.0%	0	0.0%	0	0.0%	0	0.0%	460	1.0%
Subtotal, Housing Problems	**2,906**	**6.4%**	**2,796**	**6.1%**	**4,115**	**9.0%**	**2,790**	**6.1%**	**12,607**	**27.6%**
Subtotal, Owner Households	**3,305**		**4,455**		**7,730**		**5,735**		**21,225**	

	Renter-Occupied Households									
	0-30% AMI		30-50% AMI		50-80% AMI		80-100% AMI		All Households (b)	
Housing Problem Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Substandard Housing (c)	185	0.4%	170	0.4%	180	0.4%	50	0.1%	585	1.3%
Severly Overcrow ded (d)	155	0.3%	215	0.5%	295	0.6%	205	0.4%	870	1.9%
Overcrow ded (e)	375	0.8%	645	1.4%	945	2.1%	390	0.9%	2,355	5.2%
Severe Housing Cost Burden (f)	4,085	9.0%	2,700	5.9%	1,230	2.7%	145	0.3%	8,160	17.9%
Housing Cost Burden (g)	145	0.3%	1,640	3.6%	3,180	7.0%	1,360	3.0%	6,325	13.9%
Zero/Negative Income	550	1.2%	0	0.0%	0	0.0%	0	0.0%	550	1.2%
Subtotal, Housing Problems	**5,495**	**12.0%**	**5,370**	**11.8%**	**5,830**	**12.8%**	**2,150**	**4.7%**	**18,845**	**41.3%**
Subtotal, Renter Households	**6,085**		**6,145**		**7,925**		**4,240**		**24,395**	
Total, Households at or Below Median Income (b)	**9,390**		**10,600**		**15,655**		**9,975**		**45,620**	

Notes:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.
(b) Includes all households at or below the median income level.
(c) Lacking complete plumbing or kitchen facilities.
(d) Greater than 1.5 persons per room.
(e) 1.01 to 1.5 persons per room.
(f) Housing costs greater than 50% of gross income.
(g) Housing costs greater than 30% but less than 50% of gross income.

Sources: U.S. Department of Housing and Urban Development (HUD), 2012-2016 CHAS data; BAE, 2020.

Housing Conditions

All built structures, including housing, are subject to gradual deterioration over time. As their relative condition decreases, properties typically also decrease in market value all other factors being equal. This can further discourage reinvestment (i.e., it becomes progressively more expensive and time consuming to improve the property) and can directly impact the quality life of residents and neighbors, even to the point of becoming a community nuisance and/or health and safety hazard. Therefore, maintaining a high quality housing stock provides discrete community benefits. Nonetheless, the relationship between housing quality and cost also has significant implications for housing affordability among lower-income populations. In many cases, the housing that is most affordable at low incomes is also of the poorest quality. To the extent that lower-income households are also members of protected classes, the condition of the housing stock available to them can also be a fair housing issue.

San Joaquin County most recently conducted a housing conditions survey in 2004, which sampled 254 units throughout the County. The survey found that around 60 percent of the units were in "sound" condition, with 16 percent requiring minor repairs and 18 percent requiring moderate repairs. Only 7.5 percent needed major repairs (i.e., dilapidated). According to the 2015-2023 San Joaquin County Housing Element, the Delta and the Stockton planning areas showed the lowest proportions of units in sound condition and 10.0 percent or more of the units were in need of major repair or renovation. Lathrop and Manteca also had lower than average percentages of units in sound condition and higher than average percentages of units in need of major repair. The Tracy planning area, by comparison, had an above average share of units in sound condition with the fewest units in need of repair or major renovation.

Table 27: Housing Conditions Survey Summary, San Joaquin County, 2004

	Single-Family		Multi-family (2-4 units)		Multi-family (5+ units)		Mobile Home		Total	
Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Sound	1,420	63.1%	26	37.7%	24	68.6%	14	8.7%	1,484	59.0%
Minor	358	15.9%	22	31.9%	6	17.1%	5	3.1%	391	15.5%
Moderate	373	16.6%	15	21.7%	5	14.3%	59	36.6%	452	18.0%
Substantial	88	3.9%	4	5.8%	-	0.0%	56	34.8%	148	5.9%
Dilapidated	13	0.6%	2	2.9%	-	0.0%	27	16.8%	42	1.7%
Total	**2,252**	**100.0%**	**69**	**100.0%**	**35**	**100.0%**	**161**	**100.0%**	**2,517**	**100.0%**

Source: San Joaquin County Housing Element, 2015; BAE, 2020.

In order to gain a more up to date perspective on housing conditions, BAE requested information on code enforcement cases reported to each participating jurisdiction. San Joaquin County was the only participating jurisdiction to provide the necessary data.

According to the information provided by the County, which is illustrated in Figure 13, the County Environmental Health Department opened 107 residential code enforcement cases on 83 unique parcels between September 18, 2018 and June 9, 2020. Of those, 64 percent (68 cases) resulted in issuance of a "red tag," which indicates that a structure is unsafe to occupy. The most common code violations identified in the data (i.e., those present in greater than 30 percent of cases) include:

- General dilapidation or improper maintenance (52 percent; 56 cases);
- Members of ceilings, roofs, ceilings and roof supports, or other horizontal members which sag, split, or buckle due to defective material or deterioration or of insufficient size to carry imposed load with safety (32 percent; 34 cases);
- Hazardous or inadequate wiring (57 percent; 61cases);
- Deteriorated or ineffective waterproofing of exterior walls, roof, foundations, or floors, including broken windows or doors or lack of paint or other protective covering (49 percent, 52 cases);
- Broken, rotted, split or buckled exterior wall coverings or roof coverings (35 percent; 37 cases);
- Accumulation of weeds, vegetation, junk, dead organic matter, debris, garbage, offal, rodent harborages, stagnant water, combustible materials, and similar materials or conditions constituting fire, health, or safety hazards (38 percent; 41 cases).

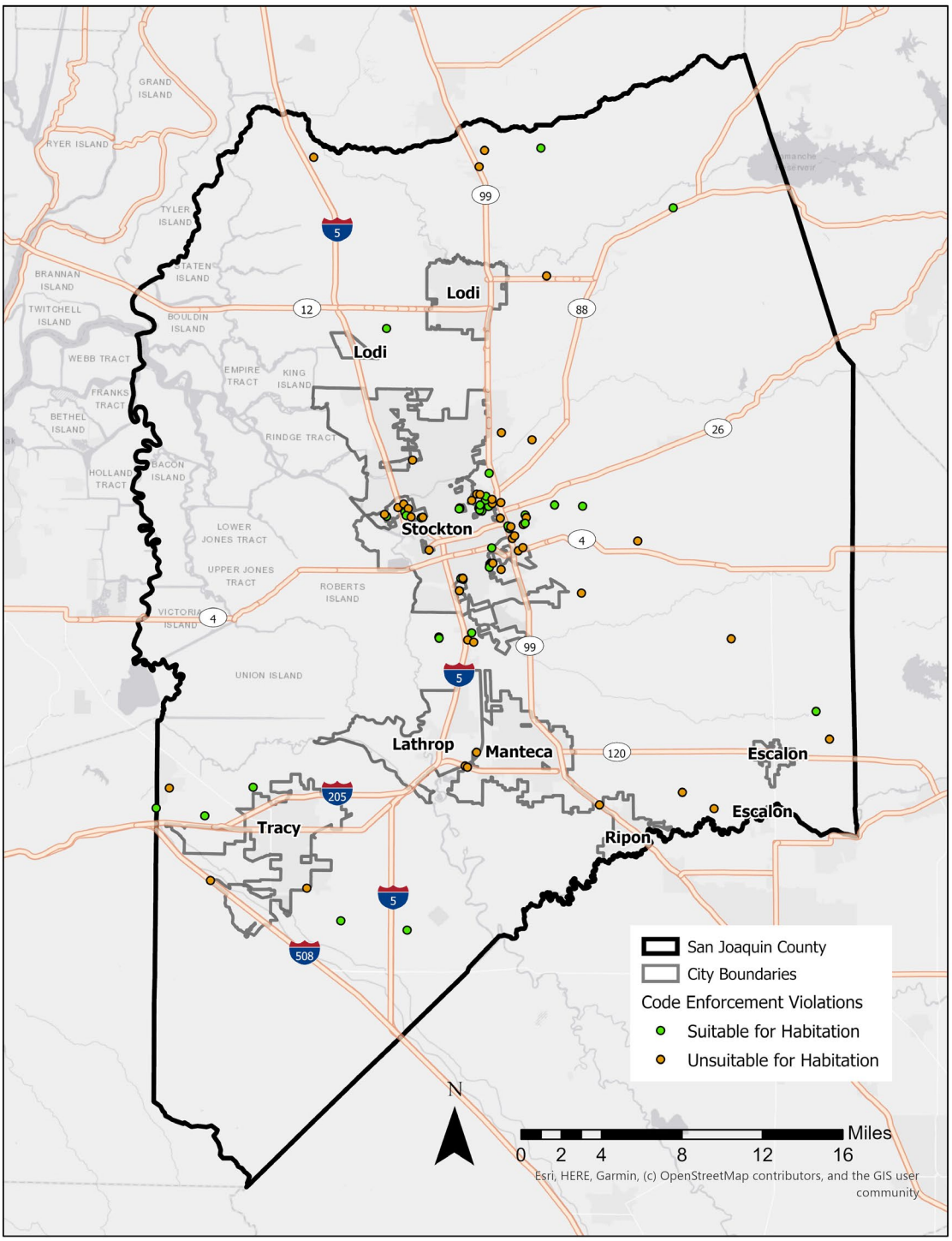
The County also provided data for an additional 15 residential code enforcement cases on 14 parcels that pertained to mobilehome units. Of those, seven cases resulted issuance of red tag notices. Among all mobile home cases, the most prevalent violations include:

- General dilapidation or improper maintenance (60 percent; nine cases);
- Defective or deteriorated flooring or floor supports (33 percent; five cases);
- Other nuisance that is injurious to health (40 percent; six cases);
- Electrical hazards (53 percent; eight cases);
- Hazardous mechanical (33 percent; five cases);
- Lack of conformity with regulations pertaining to fuel, gas, water, electricity, or sewage connections (47 percent; seven cases);
- Lack of a building permit prior to installation of the unit (53 percent; eight cases);
- Utility facilities not installed and/or approved prior to installation inspection (33 percent; five cases).

As illustrated in Figure 13, the majority of code enforcement cases in the unincorporated area of San Joaquin County are generally concentrated within unincorporated pockets that are otherwise within or adjacent to the City of Stockton. There are also smaller clusters of code

enforcement cases adjacent to the cities of Lathrop, Manteca, and Tracy. There are also concentrations of cases in parts of the unincorporated County that are farther away from the established urban centers, including one cluster to the north of State Highway 4 between Stockton and Farmington, and one south of State Highway 120 between Manteca, Ripon, and Escalon.

Figure 13: Code Enforcement Violations, September 2018 to June 2020



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, BAE, 2020.

2.7 – Assisted Housing Resources

Public and Private Assisted Housing

The availability and location of public and private assisted housing often represents a fair housing concern in communities throughout California. By intentionally locating subsidized housing in higher opportunity neighborhoods, local jurisdictions encourage the socioeconomic de-segregation of their communities and promote equitable opportunities for all residents, though the prioritization of affordable housing options in higher opportunity areas should not come at the expense of disinvestment in lower opportunity areas. Residents of these areas, which are often lower-income and feature higher concentrations of minorities, often value the amenities and sense of community present in their neighborhood and do not necessarily want to leave. Therefore, it is important to encourage the provision of sufficient affordable housing resources within areas that exhibit the highest need, while also ensuring the availability of affordable housing in higher-cost, higher-income areas that can offer greater opportunities for employment, education, healthcare, and a host of other important services.

Public Housing

The Housing Authority of the County of San Joaquin (HACSJ) owns and operates around 1,075 public housing units in four properties countywide. Due to redevelopment efforts underway at a number of HASJC-owned complexes which involve demolition and replacement of units, there are currently 986 public housing units located throughout the county. Two of the public housing complexes owned and operated by the HACSJ are located within the City of Stockton, including Conway Homes and Sierra Vista Homes (~950 units). The HACSJ also operates Tracy and Buthmann Homes in Tracy (195 single-family units) and Mokelumne Manor in Thornton (50 single-family units). In addition to these units, the HACSJ also operates four farm labor housing centers with a total of approximately 300 units, including Harney Lane Migrant Center in Lodi, Joseph J. Artesi II and III Migrant Center in French Camp, and Sartini Manor in Thornton.

Other Affordable Housing Projects

In addition to the properties discussed above, which are directly managed by the HACSJ, County staff provided information regarding 28 other affordable housing projects located throughout San Joaquin County, including 1,234 units located within the Urban County. The majority of these units are located in Manteca and Tracy, with one project located in Escalon.

Table 28: Non-HACSJ Housing Projects

Project Name	Location	Number of Affordable Units/Beds
Heritage House	Escalon	42
Lodi Hotel	Lodi	76
301 E Oak	Lodi	1
303 E Oak	Lodi	1
104 Washington	Lodi	1
Atherton Apartments	Manteca	152
Almond Terrace Senior Apartments	Manteca	79
Almond Court Apartments	Manteca	39
Cedar Green	Manteca	66
Eskaton Manteca Apartments	Manteca	83
Magnolia Court	Manteca	51
Union Court Apartments (HCD)	Manteca	27
Union Court Apartments (CalHFA)	Manteca	62
Vernal Apartments	Manteca	54
Yosemite Apartments	Manteca	26
Casa De Oasis	Stockton	37
Sienna Terrace	Stockton	43
Valle Del Sol	Stockton	76
Moorfield Properties	Stockton	4
Church St Triplex	Stockton	3
Chesapeake Bay Apartments	Tracy	150
Mountain View Townhomes	Tracy	36
Stone Pine Meadows (CalHFA)	Tracy	24
Stone Pine Meadows (LIHTC)	Tracy	71
Sycamore Village	Tracy	65
Tracy Senior Apartments	Tracy	49
Tracy Garden Apartments	Tracy	87
Tracy Village Apartments	Tracy	71
		1,476

Sources: San Joaquin County, 2020; BAE, 2020.

Housing Choice Vouchers

The Housing Choice Voucher (HCV) program, previously known as Section 8, is a rental subsidy program designed to assist very low-income households to secure adequate and affordable housing provided by private sector property owners. Under the program, participating households are eligible to pay no more than 30 percent of their income for housing and are permitted to do their own research to identify a housing unit that would most appropriately suit their needs. The rent must be not greater than the associated FMR, which is the maximum rent that can be paid under the program for a unit of a certain size, as determined by HUD. The difference between the amount that the tenant can pay, capped at 30 percent of income, and the FMR, is equal to the value of the voucher provided to the property owner.

HACSJ administers the HCV program in San Joaquin County. According to the HACSJ, a total of 5,188 households participated in the HCV program countywide as of June 2020 with around 70 percent residing in the City of Stockton, which is not part of the Urban County. The HACSJ

indicates that while the majority of the vouchers are tenant-based, the agency also administers 491 project-based vouchers, 259 Veterans Affairs Supportive Housing (VASH) vouchers, 58 Mainstream Vouchers for non-elderly persons with disabilities, and 69 Family Unification Program (FUP) special purpose vouchers.

Consultations with public and private housing and supportive service providers indicate that many HCV holders struggle to find landlords willing to accept HCV's and, as a result, many HCVs remain unutilized. For example, additional data provided by the HACSJ in October 2019 indicate that at that time only 78 percent of the HCVs issued at that time were being utilized. HACSJ staff indicate that approximately 40 percent of households in the County that are issued HCVs are successful in securing a unit using the HCV. This is due to a confluence of factors including the stigma associated with HVC recipients, the difficulty of finding a willing landlord who has a vacant unit that also meets quality standards, and FMR rental limits set by HUD that are often lower than the rent that property owners could charge to a tenant that does not have an HCV. Stakeholders report that in many cases, landlords are discouraged from accepting HCVs because the per unit operating costs and restricted rental rates exceed the FMR set by HUD, which would result in a net deficit to the landlord. As an incentive for landlords to accept HCVs, in 2018 the Central Valley Low-Income Housing Corporation (CVLIHC) began offering a one-time up-front cash payment of $1,500 for units rented below FMR, and $500 for units rented above FMR. Additionally, the CVLIHC hired a staff person whose sole job is to build relationships with landlords and encourage them to rent to HVC holders. While CVLIHC staff indicate the housing locator and cash incentives expanded the pool of landlords willing to accept HCVs and HACSJ staff report that such incentives can help households secure housing using HCVs, CVLIHC has since discontinued the incentive payments due to a lack of funds. Instead, CVLIHC has offered landlords an additional security deposit in some cases in exchange for a lower rent that is closer to the FMR. Overall, the shortage of HCVs and the difficulty that households with HCVs face when trying to secure a unit serves as in an impediment to fair housing choice for lower-income residents.

With the implementation of SB 329 starting in January, 2020, it is now illegal for California landlords to discriminate against prospective tenants whose income includes federal, state, or local public assistance and federal, state, or local housing subsidies. This builds on previous State law that made it illegal for landlords to discriminate based on tenants' source of income. Although there may still be legitimate reasons for landlords to reject prospective tenants who happen to hold HCVs, the widespread difficulties that voucher holders report in finding landlords willing to rent them housing suggests a need for a concerted effort to build awareness of this new law throughout San Joaquin County.

Licensed Community Care Facilities

The Community Care Licensing Division (CCLD) of the California Department of Social Services (DSS) provides oversight and licensing for care facilities for persons who cannot live alone, but who do not need extensive medical services. The services provided in these facilities vary

according to the needs of the individual, but typically include help with managing medications, assistance with personal hygiene, dressing and grooming, as well as other tasks associated with daily living. The facilities may also provide supervision and programs for individuals with Alzheimer's disease and other forms of dementia. The CCLD provides oversight for a variety of facility types, including childcare facilities, residential children's homes, adult and elderly care facilities, and other homes for special needs groups.

According to records maintained by the CCLD and summarized in Table 29, there are 194 community care facilities in the San Joaquin Urban County, out of 636 total facilities countywide. This includes facilities and specialized service providers that range from adoption agencies and childcare centers, small-family homes, adult daycare facilities, residential care facilities for adults and the elderly, and social rehabilitation facilities, among others. Figure 14, in the following pages, shows the distribution of these facilities throughout San Joaquin County. The figure and the table do not include residential care facilitates for children, such as foster care facilities and group homes, which the CCLD does not report in order to protect the clients served by these facilities. According to these data, 63.6 percent of all community care facilities within the county are in either Stockton or Lodi. The facilities in the Urban County are concentrated in Tracy, Lathrop, and Manteca, with clusters in Ripon and Escalon as well. However, there are some facilities in the unincorporated parts of the County, and most are near Block Groups with a low-/moderate-income population of greater than 50 percent.

Table 29: Licensed Community Care Facilities, San Joaquin County, 2020

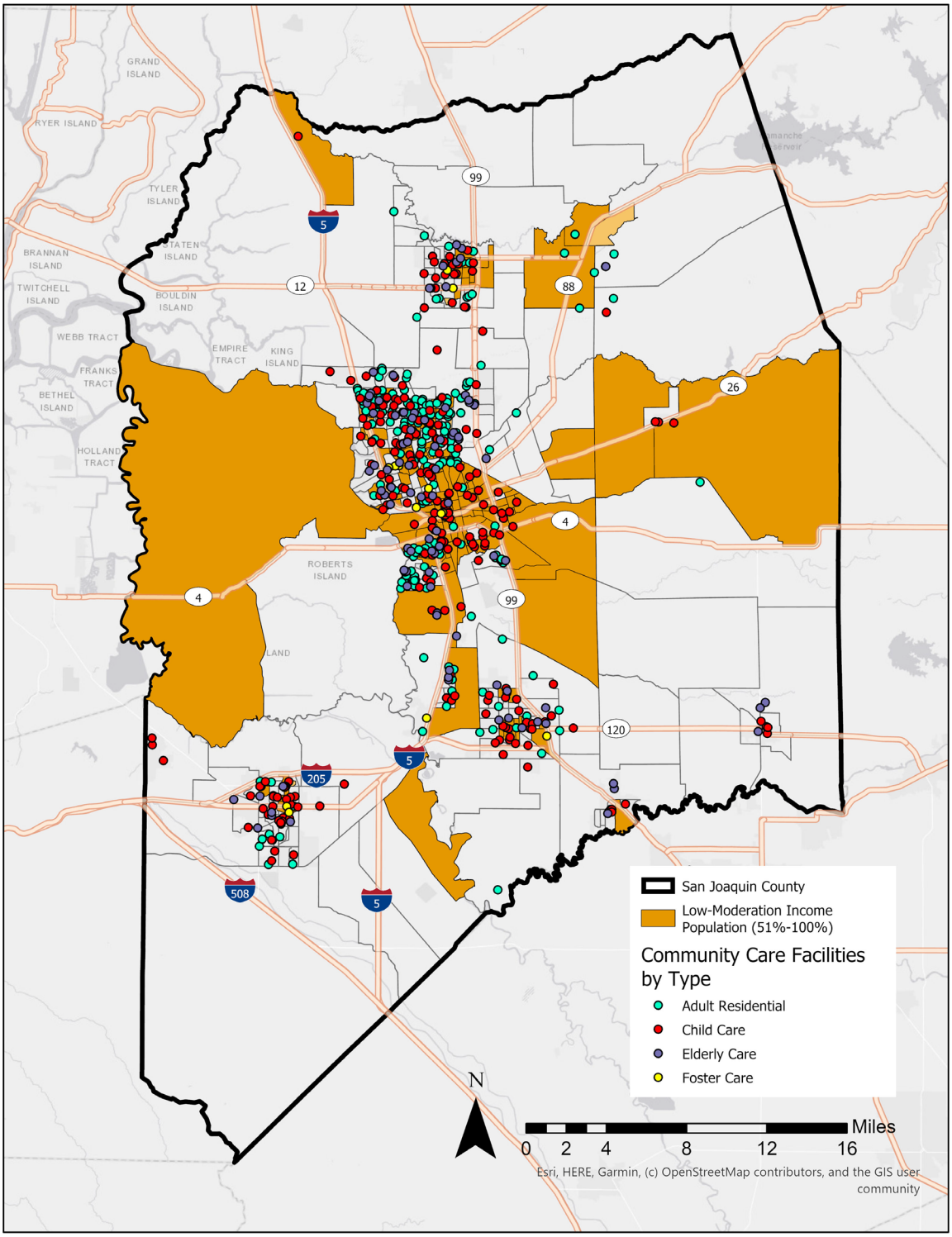
	San Joaquin Urban County					
	Licensed Facilities		Pending Licensure		Total, All Facilities	
	Number	Capacity	Number	Capacity	Number	Capacity
Foster Family Agencies	5	152	0	0	5	152
Residential Elder Care Facility	27	870	0	0	27	870
Residential Care for Children			(a)			
Child Care Centers	119	5,747	5	120	124	5,867
Capacity of 8 or less	*2*	*16*	*0*	*0*	*2*	*16*
Capacity of more than 8	*117*	*5,731*	*5*	*120*	*122*	*5,851*
Adult Residential Facilities	37	589	1	6	38	595
Total, All Facilities (b)	**188**	**7,206**	**6**	**126**	**194**	**7,484**

	San Joaquin County					
	Licensed Facilities		Pending Licensure		Total, All Facilities	
	Number	Capacity	Number	Capacity	Number	Capacity
Foster Family Agencies	18	361	1	0	19	361
Residential Elder Care Facility	98	3,115	0	0	98	3,115
Residential Care for Children	(a)					
Child Care Centers	291	13,470	8	172	299	13,642
Capacity of 8 or less	*4*	*31*	*0*	*0*	*4*	*31*
Capacity of more than 8	*287*	*13,439*	*8*	*172*	*298*	*13,611*
Adult Residential Facilities	214	3,436	6	26	220	3,462
Total, All Facilities (b)	**621**	**20,382**	**15**	**198**	**636**	**20,580**

Note:
(a) Residential care facilities for children not reported to protect the clients served by the facilities.
(b) Does not include residential care facilities for children.

Sources: California Department of Social Services, Community Care Licensing Division, 2020; BAE, 2020.

Figure 14: Licensed Community Care Facilities, San Joaquin County, 2020



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, BAE, 2020.

2.8 – Economic Profile

Impediments to fair housing choice may also exist in those instances where members of protected classes have limited access to economic opportunity. For example, persons who depend on public transportation, such as lower-income households and disabled persons, are not only more limited in their housing options, but also in their employment options, since they must not only secure suitable and affordable housing within a reasonable distance from a transit stop, but must also locate and secure employment that meets their needs and is similarly accessible using public transportation if they are not able to walk, bicycle, or use some other means of transportation aside from a personal vehicle. The remainder of this subsection identifies major employment centers within San Joaquin County and evaluates access to employment and economic opportunity for members of protected classes.

Major Employment Centers

According to projections published by the San Joaquin Council of Governments (SJCOG), there are approximately 256,019 jobs in San Joaquin County in 2020. By 2025, SJCOG anticipates this number will increase to approximately 270,185 jobs. However, SJCOG's projections do not account for the impact of COVID-19 and the current recession, so these projections should be viewed with caution. The California Employment Development Department (EDD) estimates that as of August 1st, 2020, the number of jobs in the County overall is approximately 243,400.

The SJCOG projections estimate that approximately 42.5 percent of jobs in San Joaquin County in 2025 will be in the Urban County, while 47.6 percent will be in the City of Stockton and the remaining 9.9 percent will be in the City of Lodi. The average annual growth in jobs between 2015 and 2040 is projected to be comparable between the Urban County and the County overall, at approximately 1.0 percent. The City of Lathrop is projected to be the fastest growing jurisdiction in terms of jobs, with an average annual change of 2.3 percent by 2040, whereas the unincorporated parts of the County are projected to grow at the slowest annual average rate (0.6 percent) among all jurisdictions.

Table 30: Employment Projections, San Joaquin County, 2015-2045

Jurisdictions	2015	2020	2025	2030	2040	2045	Avg. Annual Change 2015-2040
Escalon	1,838	1,982	2,070	2,164	2,255	2,350	0.8%
Lathrop	5,984	7,459	8,629	9,709	10,756	11,805	2.3%
Lodi	23,605	25,389	26,801	28,284	29,858	31,438	1.0%
Manteca	16,231	17,592	18,631	19,770	20,968	22,146	1.0%
Ripon	3,653	4,053	4,312	4,555	4,802	5,053	1.1%
Stockton	112,225	121,350	128,522	136,280	144,228	151,979	1.0%
Tracy	21,702	24,651	25,833	27,100	28,382	29,616	1.0%
Unincorporated	49,622	53,543	55,388	57,233	58,668	60,156	0.6%
San Joaquin Urban County	**99,029**	**109,280**	**114,863**	**120,532**	**125,832**	**131,127**	**0.9%**
San Joaquin County	**234,859**	**256,019**	**270,185**	**285,095**	**299,918**	**314,544**	**1.0%**

Note:
(a) San Joaquin Urban County comprises City of Escalon, City of Lathrop, City of Manteca, City of Ripon, City of Tracy, and unincorporated San Joaquin County.

Sources: San Joaquin Council of Governments (SJCOG), County Forecast Summary, 2017; BAE, 2019.

Consistent with the above data on the distribution of employment by jurisdiction, the Stockton area hosts 12 of San Joaquin County's 25 largest employers, which are listed in Table 31, while the Urban County is home to seven. The seven large employers in the Urban County are in the 1,000 to 4,999 employee size class. Four of the seven largest employers in the Urban County are in Tracy, including a cheese processor, distribution center, an Amazon distribution hub, and a vocational institution, which in part reflects that warehousing is a growing sector of the local economy. The remaining three largest employers are in the unincorporated parts of San Joaquin County, including a hospital and two major employers in food packing and processing. The largest employer in the County is Blue Shield of California, in Lodi.

Table 31: Major Employers, San Joaquin County, 2019

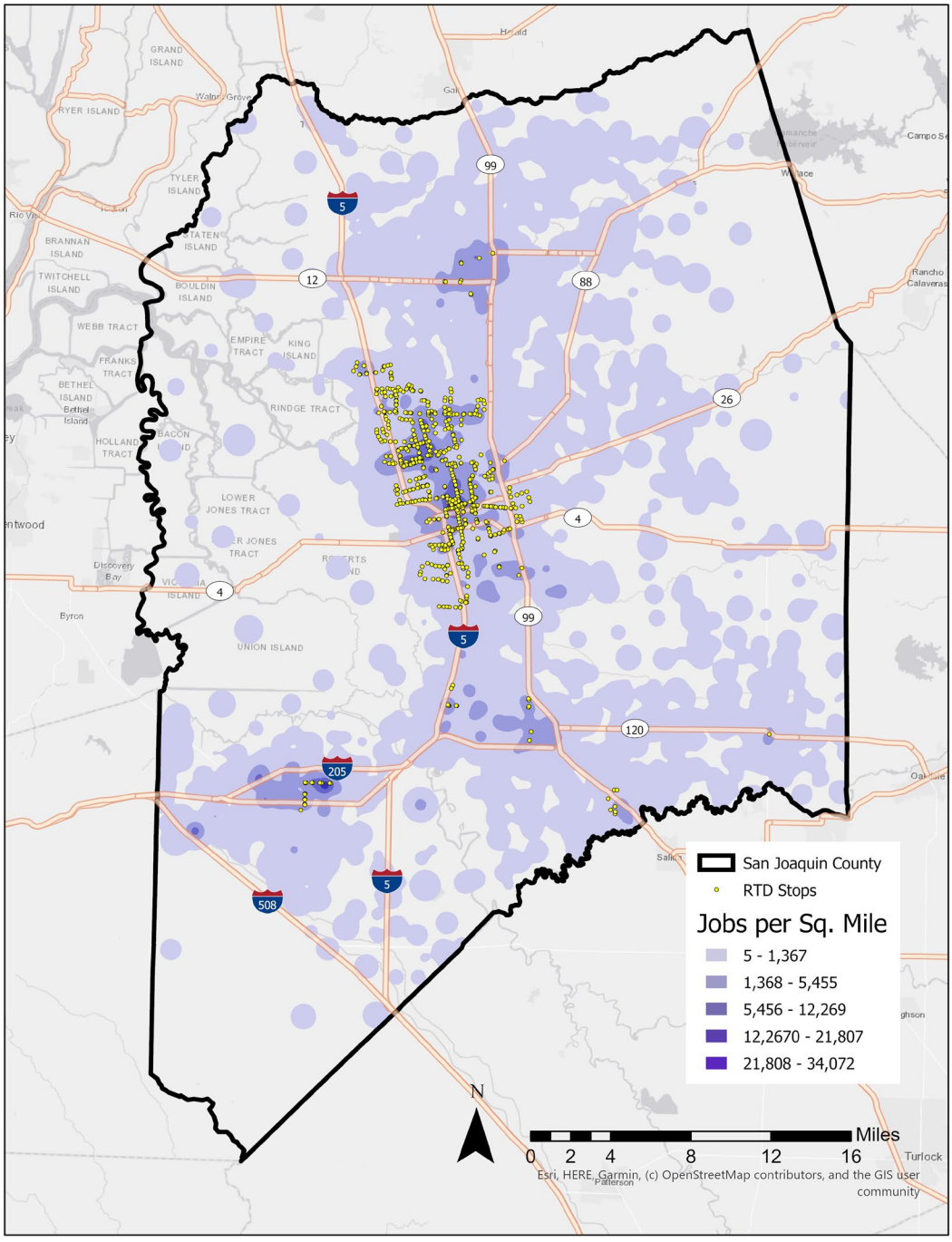
Company	Location	Employer Size Class	Business Type
San Joaquin General Hospital	French Camp	1,000-4,999	Hospitals
A Sambado & Sons Inc	Linden	1,000-4,999	Nuts-Edible
Prima Frutta Packing Inc	Linden	1,000-4,999	Fruit & Produce Packers
Blue Shield of California	Lodi	5,000-9,999	Insurance
Lodi Health Home Health Agency	Lodi	1,000-4,999	Home Health Service
Lodi Memorial Hospital	Lodi	1,000-4,999	Hospitals
Pacific Coast Producers	Lodi	1,000-4,999	Canning (mfrs)
Derby International	Not Available	1,000-4,999	Telecommunications Services
North Ca Correctional Youth	Not Available	1,000-4,999	Police Departments
Dameron Hospital Assn	Stockton	1,000-4,999	Hospitals
Foster Care Svc	Stockton	500-999	Government Offices-County
Inland Flying Svc	Stockton	1,000-4,999	Aircraft Servicing & Maintenance
Morada Produce	Stockton	500-999	Fruits & Vegetables-Growers & Shippers
NA Chaderjian Youth	Stockton	1,000-4,999	State Govt-Correctional Institutions
O-G Packing & Cold Storage Co	Stockton	1,000-4,999	Fruits & Vegetables-Growers & Shippers
San Joaquin County Human Svc	Stockton	500-999	Government Offices-County
San Joaquin County Sch	Stockton	1,000-4,999	Schools
Sjgov	Stockton	1,000-4,999	Government Offices-County
St Joseph's Cancer Ctr	Stockton	1,000-4,999	Cancer Treatment Centers
Stockton Unified School Dist	Stockton	1,000-4,999	School Districts
University of the Pacific	Stockton	500-999	Schools-Universities & Colleges Academic
Amazon Corpnet	Tracy	1,000-4,999	Internet & Catalog Shopping
Deuel Vocational Institution	Tracy	1,000-4,999	City Govt-Correctional Institutions
Leprino Foods Co	Tracy	1,000-4,999	Cheese Processors (mfrs)
Safeway Distribution Ctr	Tracy	1,000-4,999	Distribution Centers (whls)

Sources: California Employment Development Department, Major Employers by County, 2019; BAE, 2019.

Access to Employment

Figure 15 illustrates the distribution of employment throughout the San Joaquin Urban County on a jobs per square mile basis, in relation to existing San Joaquin Regional Transit District (RTD) bus stops and routes. The Urban County is not as well served by RTD as the city of Stockton. Although Stockton has a high concentration of jobs, which largely correspond with bus routes in the city, there are no stops in outlying unincorporated parts of the County, which presents an obstacle for the East County in particular. Nonetheless, there are routes that connect Stockton to cities and places in the Urban County, including Tracy, Manteca, French Camp and Ripon. The eastern part of the Urban County, east of Stockton and in the northeast and southeast corners of the County, contains significant numbers of jobs, though at relatively low density. Lathrop and Manteca have some RTD stops, although the employment density there is not as high as in Stockton, or even Tracy. The main employment center in Tracy contains between 21,088 and 34,072 jobs per square mile, with bus stops located to the west and south. There are two relatively dense employment concentrations west of Tracy along Interstate 205 and along Interstate 508 that do not appear to be well served by RTD.

Figure 15: Concentration of Jobs, San Joaquin County, 2017



Sources: U.S. Census Bureau, Longitudinal Employer-Household Dynamics (LEHD), OnTheMap, 2017; .BAE, 2020.

SECTION 3 – IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

3.1 – Impediments in the Public Sector

Public policies, established at all levels of government, can affect the nature and extent of housing development and, therefore, may impact the type and location of the available housing stock. Fair housing laws are designed to encourage an inclusive residential environment. To this end, a periodic assessment of public policies and procedures can facilitate the identification of real and potential impediments to fair housing opportunity and choice. The remainder of this section presents an overview of regulations, polices, and practices established by local government agencies. The analysis primarily focuses on those items that are under the direct purview of San Joaquin County and its partner jurisdictions.

General Plan

California law requires that each county and city in the state adopt a General Plan that functions as a statement of development policies, setting forth the objectives, principles, standards, and requirements of the jurisdiction as they pertain to land development and other related topics. The General Plan is a comprehensive long-term planning document, or "blueprint," that outlines how the community plans to manage growth and development.

Accounting for fairly recent changes to State law, there are nine "elements" that the State of California requires communities to include in their General Plans. These include Air Quality, Circulation, Conservation, Environmental Justice, Housing, Land Use, Noise, Open Space, and Public Safety. While all of these elements may in some way impact the ways in which housing is developed and provided within a given jurisdiction, those that most directly pertain to housing and which most often include and/or address barriers to fair housing, include the Housing Element and the Land Use Element, both of which are discussed below.

Housing Element

As one of the nine elements of the General Plan that are mandated by the State of California, the Housing Element is subject to review and certification by the California Department of Housing and Community Development (HCD). State Housing Element law, enacted in 1969 and revised through subsequent legislation, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community as determined through the Regional Housing Needs Allocation (RHNA) process. The law is predicated on the assumption that in order for the private market to adequately satisfy housing demand at all income levels, and address housing needs as they may arise, local governments must adopt land use plans and regulatory frameworks that, at a minimum, do not unduly constrain, and in some ways actively encourage, housing development that is characterized by a variety of housing types which are affordable at a variety of income levels.

As a result, effective housing policy in California necessitates the effective implementation of local General Plans and, in particular, local Housing Elements.

To achieve these goals, Housing Elements in California are required to identify the ways in which each jurisdiction will do the following:

- Identify available sites that are appropriately zoned and that have adequate public infrastructure and services to facilitate development of a range of housing types;
- Encourage the development of adequate housing to meet the needs of Low- and Moderate-Income households;
- Address, and where appropriate and legally possible, remove governmental constraints to the development, improvement, and maintenance of housing;
- Conserve and improve the condition of the existing housing stock;
- Promote equitable housing opportunities and remove barriers to fair housing, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The State of California requires that jurisdictions throughout the State update their Housing Elements on a regular cycle of either five or eight years. Jurisdictions within the San Joaquin Urban County most recently updated their Housing Elements in 2015 and are next scheduled to complete updates in 2023. For the sixth cycle Housing Element update due in 2023, local jurisdictions will now be required to incorporate changes to State law enacted in 2018 through Assembly Bill 686. The new requirements are modelled on the Obama-era federal Affirmatively Furthering Fair Housing (AFFH) policy that was intended to replace the current standard for fair housing analysis, but which was later repealed by the Trump administration. As a result, under State law, local jurisdictions will need to consider many of the same issues identified here (i.e., as part of the AI), and will need to conduct analyses not currently required as part of the AI, as part of their next Housing Element update.

Land Use Element

The Land Use element of the General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, community facilities, and other land uses. As it applies to housing, the Land Use element establishes a range of potential land use categories that may be permitted within the jurisdiction, and describes the types of housing permitted within each and identifies the characteristics associated with that development, such as allowable density. Residential land use policy is subsequently implemented through zoning districts and development standards specified in the zoning ordinance, which must be consistent with the General Plan, and the Land Use element more specifically.

Zoning Ordinance and Other Regulations

One of the common factors influencing the feasibility of new housing development, particularly in costly markets such as California, is the concept of economies of scale. When a real estate developer is able to accommodate more housing units on the same land, they are better able to distribute fixed costs (i.e., costs that don't change based on the number of housing units provided) across a larger development project. This decreases the average cost per unit and allows the developer to rent or sell the units at lower prices, while achieving the same per unit returns. In addition, the cost of land is a major contributor to overall housing production costs, so the per-unit land cost for housing development can be reduced when a developer is allowed to build more units per acre (i.e., higher density). Therefore, in order to encourage the private market to develop housing that is affordable to low- and moderate-income households, California Housing Element law focuses on ensuring that local General Plans have an adequate supply of land zoned at residential densities that are sufficient to allow builders to develop housing at affordable price points.

According to HCD, San Joaquin County is classified as a *Suburban Jurisdiction*. For the purposes of preparing the Housing Element, the minimum density that is assumed to best facilitate development of housing that affordable to low- and moderate-income households is 20 dwelling units per acre (du/a). Every jurisdiction in the Urban County has high-density zones that allow for densities of 20 du/a or higher. In Manteca and unincorporated parts of the County, the highest density zones allow a minimum of 15 du/a, and a maximum over 25. In the rest of the jurisdictions, the highest density zones allow at least 20 du/a. The most recent Housing Element update for each of the Urban County jurisdictions also compares the development capacity of vacant land to future demand, as determined by the Regional Housing Needs Allocation (RHNA). Every Urban County jurisdiction has enough capacity in areas zoned for high-density development to meet housing demand for low- and moderate-income households based on the RHNA.

While each of the Urban County jurisdictions has adequate sites zoned at sufficient densities to meet the Housing Element requirements, additional actions might be necessary to enable the construction of affordable units on these sites. Some service providers that were contacted as part of the consultation process for this AI identified a need for additional density, either in the form of additional sites that allow multifamily development or higher allowable density thresholds, to support the production of affordable housing in the Urban County jurisdictions. Representatives of some agencies that were consulted for the AI process indicated that some sites zoned for higher-density development may not be in ideal locations to attract new market rate development, and may also be in inferior locations for a project seeking competitive tax credit financing. While most City staff that were contacted for consultations reported that their City Councils and other decisionmakers are generally supportive of affordable housing in their jurisdictions, some housing providers suggested that more streamlined approvals would facilitate development. Furthermore, staff from the City of Ripon reported that the Ripon Planning Commission and City Council would not be supportive

of a 100 percent affordable development, which likely discourages affordable housing providers from proposing projects in the City and effectively prevents the development of housing that would be affordable to lower-income households. This is because Low-income housing tax credits (LIHTC) are one of the most important sources of subsidy that enables the development of housing affordable to lower-income households yet for practical reasons related to the rules governing the tax credit program, the vast majority of LIHTC projects are 100 percent affordable. Thus, if a jurisdiction is biased against 100 percent affordable housing projects, this could prevent the use of one of the most powerful subsidy tools available to affordable housing developers.

Provisions for Second Units

Secondary dwelling units, or accessory dwelling units, are attached or detached dwellings with complete living facilities that are located on the same lot as a single-family home. The unit must be self-contained and include its own facilities for cooking, eating, and sleeping, as well as complete sanitation facilities. Due to their smaller size, second units can often provide opportunities for housing that would be affordable to lower-income households, as well as seniors and/or persons with disabilities. Local land use policies that constrain the development of second units may, therefore, have a negative impact on housing for special needs populations. Second units can also provide supplemental income for the homeowner, which can improve the affordability of home ownership for lower-income households and households on fixed incomes, such as the elderly and persons with disabilities.

To encourage the development of second units, State law requires jurisdictions to adopt ordinances that establish the conditions under which second units will be permitted, or to follow the State provisions governing second units (Government Code, Section 65852.2). A review of current zoning and development standards for San Joaquin County and all participating jurisdictions indicates that all comply with current State laws regarding second dwelling units. Second units are allowed with ministerial review in all residential districts, with one key exception. Those include within the Residential Mobile Home (RMH) district in Tracy, which governs the establishment of mobile home parks, and within the Mossdale Village Specific Plan area in Lathrop. The City of Lathrop is currently working to update the zoning code for Mossdale Village to comply with State law and, in the meantime, is deferring to State law with regard to discretionary approval of second units within the Mossdale Village area.

Density Bonus Provisions

State law (Government Code, Section 65915) requires local governments to grant a density bonus and/or financially equivalent incentives to developers that agree to provide a specific percentage of affordable housing, or childcare facilities, for lower-income households as part of an approved development. A density bonus allows a builder to increase the number of units per acre beyond the standard density allowed by the zoning for projects that do not include affordable units. The magnitude of the incentive depends on the total share of development that is designated affordable. In 2004, amendments to the State code lowered the thresholds

necessary to qualify for density bonuses and increased the concessions and incentives that local governments must provide. All jurisdictions within the San Joaquin Urban County currently comply with the State density bonus law and offer density bonuses of up to 35 percent, along with other incentives, in exchange for providing affordable housing or dedicate land for the future development of affordable housing.

Definition of Family

A jurisdiction's zoning ordinance can potentially constrain access to housing if it contains a definition of a family that is overly restrictive. For example, a definition of family that limits the number of persons and differentiates between related and unrelated individuals living together can be used to discriminate against non-traditional families and illegally limit the development and siting of group homes for individuals with disabilities. California case law (City of Santa Barbara v. Adamson, 1980 and City of Chula Vista v. Pagard, 1981) have ruled that a zoning ordinance is invalid if it defines a "family" as (a) an individual; (b) two or more persons related by blood, marriage, or adoption; or (c) a group of not more than a specific number of unrelated persons as a single housekeeping unit. Under these rulings, the definition of a family in such a way as to distinguish between blood-related and non-blood-related individuals does not serve a legitimate or useful objective or purpose that can be recognized under the zoning and/or land use planning powers afforded to local governments and subsequently violates privacy rights under the California Constitution.

A review of the current adopted zoning ordinances for each participating jurisdiction indicates that the cities of Tracy, Manteca, and Escalon have definitions of "family" that fully comply with State and Federal law. The definitions used in these jurisdictions include one or more persons living in the same dwelling unit and functioning as a cohesive housekeeping unit, similar to the standard definition of a household, with no reference to blood relation, marriage, adoption, and with no maximum on group size. By comparison, the definition of a "family" used in the City of Lathrop zoning code includes two or more related persons living in a dwelling unit or a group of individuals living together in a dwelling as a functional equivalent to a family. This definition is likely to be sufficiently broad to comply with applicable laws. The definitions in both San Joaquin County and the City of Ripon zoning codes are not in compliance with State and federal law, as both define "family" as requiring an association by blood relation or marriage, or a group of not more than five unrelated persons.

Manufactured Homes and Mobile Home Parks

State law (Government Code, Sections 65852.3 and 65852.4) specifies that a jurisdiction must allow the installation of manufactured housing on all "lots zoned for conventional single-family residential dwellings," so long as they meet federal safety and construction standards and are placed on permanent foundations. State law (Government Code, Section 69852.7) also specifies that mobile home parks shall be a permitted use on "all land planned and zoned for residential land use." However, local jurisdictions are allowed to require use permits for mobile home parks. Manufactured housing is often considered an important housing option

for lower-income households. As a result, regulations that restrict the siting of such units are considered an impediment to fair housing choice. All participating jurisdictions are in compliance with applicable State law regarding manufactured and mobile homes.

Emergency Shelters, Transitional Housing, and Supportive Housing

Local land use controls can constrain the availability of emergency shelters, transitional housing, and permanent supportive housing for homeless individuals, if the existing zoning code restricts the areas in which these uses are permitted, or if discretionary permits are required for their approval. State legislation (Government Code, Sections 65582, 65583, and 65589.5), enacted in 2008, attempts to better address the needs of homeless persons by requiring all jurisdictions to identify a zone or zones where emergency shelters are allowed by-right as a permitted use, without the need for discretionary approval. The legislation also indicates that emergency shelters "may only be subject to those development and management standards that apply to residential or commercial development within the same zone," but includes a list of exceptions. Local governments that already have one or more emergency shelters within their jurisdiction, or are part of a multi-jurisdictional agreement that accommodates that jurisdiction's need for emergency shelter, are only required to identify a zone or zones where new emergency shelters are allowed with a conditional use permit. Jurisdictions with outstanding unmet needs must identify a zone, or zones, with adequate capacity for by-right development of emergency shelter facilities sufficient to meet the outstanding needs. All participating jurisdictions comply with applicable State law regarding emergency shelters, transitional housing, and supportive services.

Community Care Facilities

Local zoning ordinances also may affect the availability of community care facilities serving special needs populations. In particular, zoning ordinances often include provisions regulating community care facilities and outlining processes for reasonable accommodation. California's Lanterman Developmental Disabilities Services Act requires jurisdictions to treat licensed group homes and residential care facilities with six or fewer residents no differently than other permitted residential uses. Cities must allow these licensed residential care facilities in any area zoned for residential use and may not require conditional use permits or other discretionary approvals. All participating jurisdictions comply with applicable State law regarding the siting of community care facilities serving special needs populations.

Building Codes and Enforcement

Building codes and their enforcement influence the style, quality, size, and costs of residential development. Such codes can impact the cost and subsequent feasibility of housing development and rehabilitation due to the requirements imposed. In this way, building codes and associated enforcement procedures can act to constrain the development and affordability of housing and are, as a result, a possible impediment to fair housing choice. Like many jurisdictions, San Joaquin County utilizes the California Building Code, which is updated periodically both at the state and local levels. The County adopted the 2016 edition in January

2017, which remains in effect as of this writing. The other jurisdictions within the Urban County also utilize various versions of the California Building Code. Similar to San Joaquin County, the cities of Tracy and Escalon are using the 2016 Building Code, while the cities of Lathrop, Ripon, and Tracy have updated to the 2019 Building Code. Because the building codes in use in the Urban County are consistent with those used by most jurisdictions throughout California, they are not perceived to negatively impact the construction of affordable housing, and therefore do not represent an impediment to fair housing choice.

Parking Standards

In many cases, off-street parking requirements can include the dedication of a significant amount land to accommodate vehicles and can significantly reduce the buildable area available for development of housing units, particularly for infill projects, which can significantly impact project feasibility. Many jurisdictions have adopted parking standards that greatly exceed the current anticipated parking needs. Developing housing to these standards increases the overall cost of development, which can have an impact on affordability. A review of adopted parking standards for participating jurisdictions indicates that parking requirements do not likely represent an undue impediment to the development of higher density housing. Adopted parking standards for participating jurisdictions generally require two covered parking spaces per single-family housing units. Standards for multifamily housing typically range by the size of the unit. Studio and one-bedroom units are generally required to have between one and 1.5 spaces per unit, while units with two or more bedrooms are required to have two parking spaces. Parking standards for community care facilities consistently require one parking space per three beds or units.

Development Fees and Other Exactions

Like many jurisdictions, San Joaquin County collects various fees from developers to cover the costs of processing permits and providing necessary services and infrastructure. Building permit and planning fees fund planning and building department activities, with the total amount charged depending on factors such as the valuation of the project, time required to process the permits, or project attributes that dictate the impact that the project has on public facilities or services. Other impact fees for agriculture and open space are charged based on gross acreage of the site and are designed to mitigate the loss of productive farmland and, as such, are only applicable to greenfield development.

As part of established Housing Element law, jurisdictions are required to analyze the "potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels…including…fees and other exactions required of developers, and local processing and permit procedures…".[10] Analyses conducted as part of the most recent Housing Element updates for participating jurisdictions indicate that the planning and

[10] Government Code Section 65583(a)

development fees levied by jurisdictions within the Urban County are generally commensurate with the cost of providing services and are not substantially different from those charged in other neighboring counties. As such, planning and development fees, as well as other exactions levied upon planned or proposed developments do not constitute an undue impediment to the development of affordable and higher density housing.

Local Gap Funding for Affordable Housing

Affordable housing development projects typically require a range of funding sources to make development possible, including federal, state, and local financing sources. Local housing providers and City staff from Urban County jurisdictions report a lack of local gap funds that affordable housing developers can use to make up the difference between total construction costs and the funding available from other sources. Such local gap funds are often a critical component of the financing package for an affordable housing development, in part because these funds are often necessary to make a project competitive for LIHTC financing and other federal and State funds.

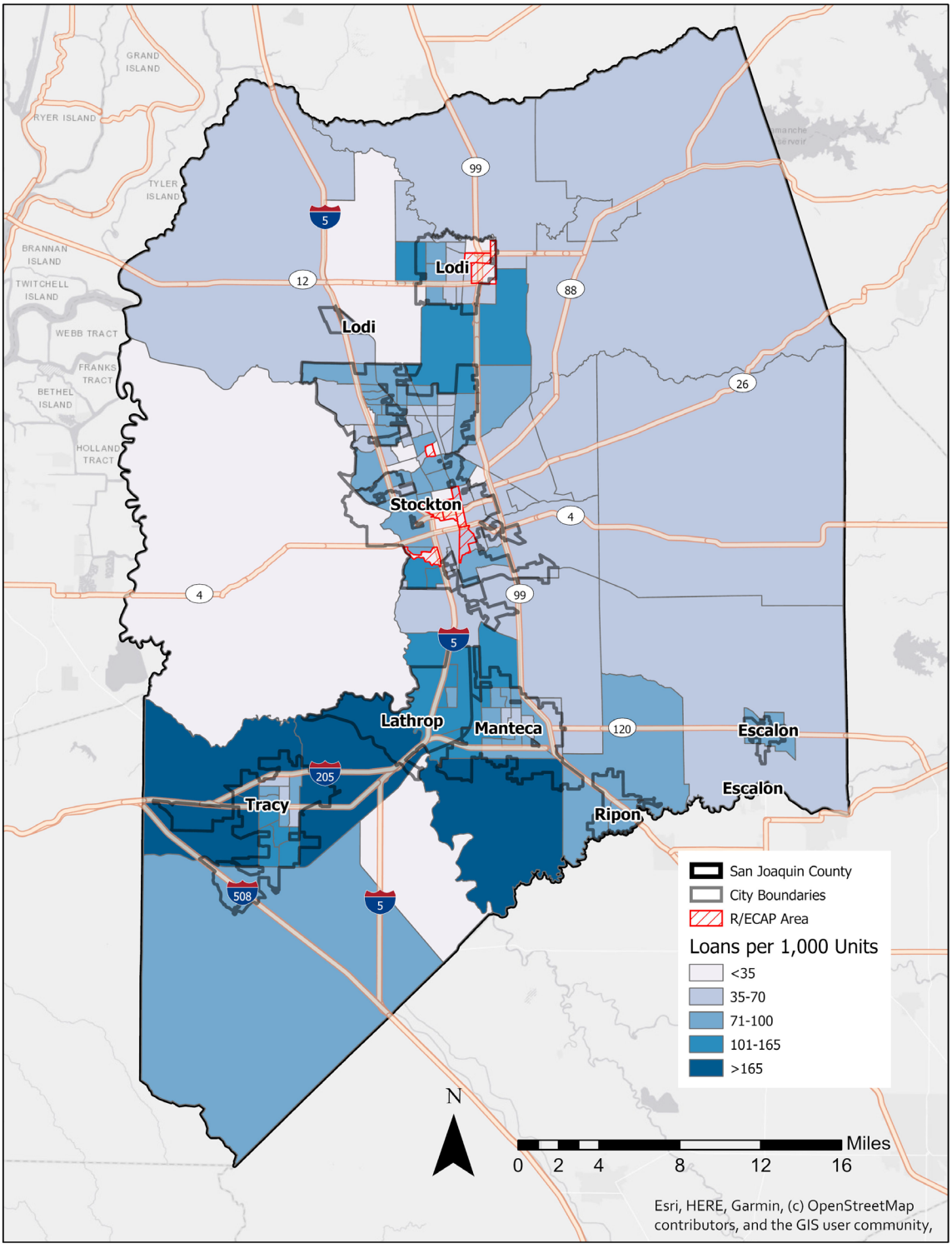
3.2 – Impediments in the Private Sector

Equal Opportunity in Mortgage and Home Improvement Financing

Geography of Mortgage Lending

As shown in Figure 16, the Block Groups with more than 165 loans per 1,000 units are in unincorporated areas surrounding Tracy, in the southwest part of the County. In South Stockton, where there are contiguous Block Groups with more than 50.0 percent low-/moderate-income population, the loans per 1,000 units range from less than 35 to 35 to 70. Interestingly, two R/ECAP Block Groups in South Stockton have 35 to 70 loans per 1,000 units, although both R/ECAP Block Groups in Lodi have less than 35 loans per 1,000 units. Within the Urban County, lending rates span from less than 35 per 1,000 units, to more than 165. Lending rates are relatively high in Tracy, Lathrop, Ripon, and Escalon compared to the unincorporated parts of the County. Block Groups in unincorporated San Joaquin County with less than 35 loans per 1,000 units include the Block Group on the Western edge of the County and the Block Groups north of Stockton and east of Interstate 5.

Figure 16: Number of Loans Originated Per 1,000 Housing Units, 2018, San Joaquin County



Sources: San Joaquin County, 2020; U.S. Census Bureau, TIGER, 2019, ACS 2018 5-year sampling period, B03002; BAE, 2020.

Race and Ethnicity of Borrowers

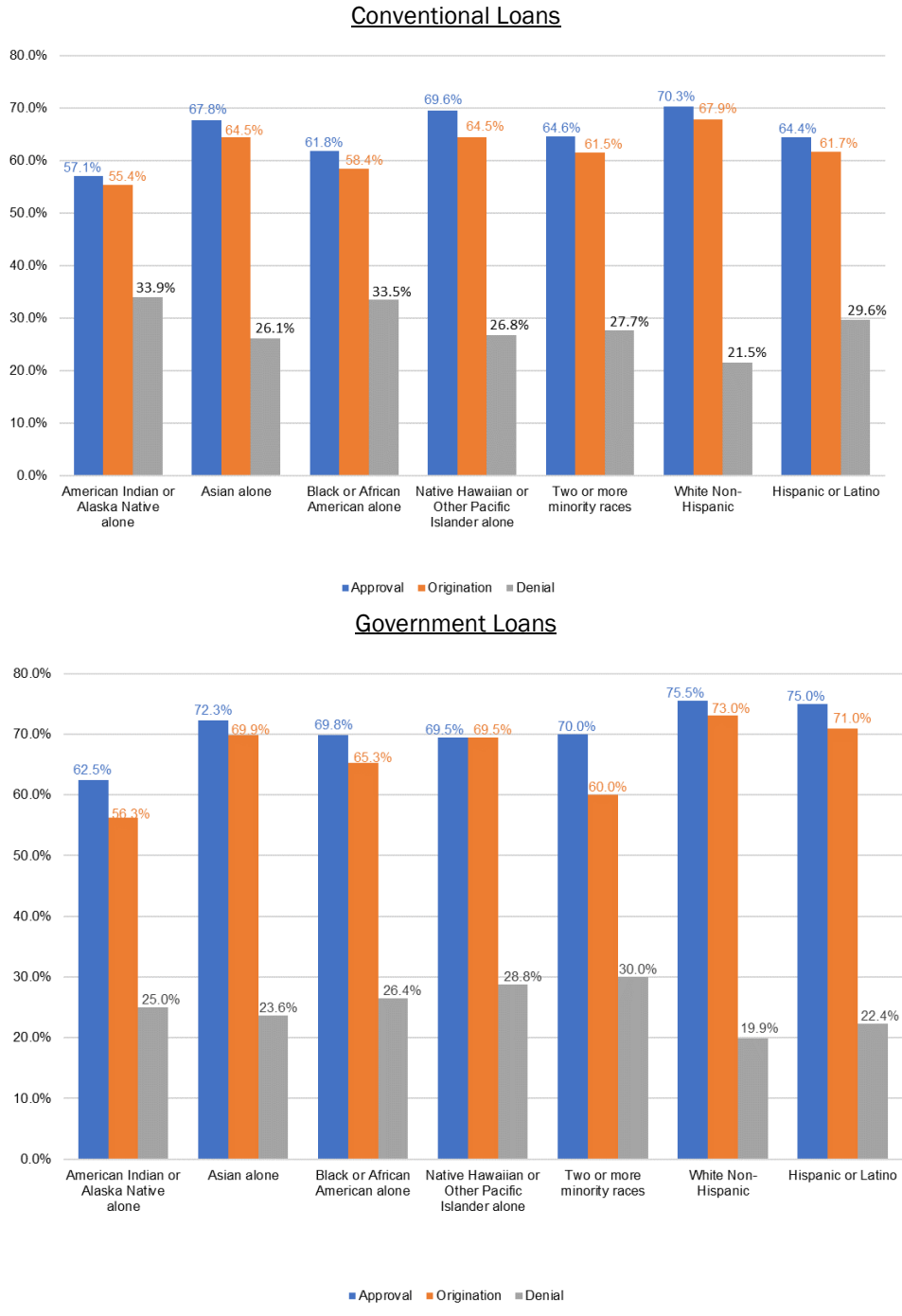
Success rates and market shares of mortgages across racial and ethnic groups were determined utilizing HMDA data on the race and ethnicity of borrowers and Census data on the race and ethnicity of San Joaquin County residents. The HMDA categorizes applicant racial characteristics into a number of distinct groups, including American Indian/Alaska Native, Asian, Black/African American, Native Hawaiian/Pacific Islander, White, Joint (White and a Minority), Two or More Minorities, and Race Not Available. "Ethnicity" is reported separately and includes Hispanic/Latino, Non-Hispanic/Latino, Joint (Hispanic/Latino and Non-Hispanic Latino), and Ethnicity Not Available.

According to these data, there were 20,853 applications for conventional loans in the San Joaquin Urban County, and of these, 19.0 percent, or 3,896, were withdrawn or incomplete. Of the valid applications, 67.4 percent were approved, and 64.6 percent resulted in loan originations. All minority groups other than American Indian/Alaskan Natives, were approved for conventional loans at rates greater than 60.4 percent, which is the portion of minorities in the Urban County's population. However, approval and origination rates for Non-Hispanic White residents were higher than for any other group, at 70.3 and 67.9 percent, respectively. Native Hawaiian/Pacific Islander and Asian residents had the second and third highest approval and origination rates. Hispanic and Latino residents were approved for loans at a rate of 64.4 percent, while 61.7 percent of loans were originated. These rates are higher than they are for Black/African American residents, for whom approval and origination rates were 64.8 and 58.4 percent, respectively. American Indian/Alaskan Native residents experienced the lowest approval and origination rates, although these residents accounted for 0.4 percent of all applications, so the sample size may be too small to draw any meaningful conclusions about discrimination in mortgage lending within these populations.

There is a discrepancy between the rates of Hispanic and Latino residents in the Urban County population and the rate of loan applications and approved loans. Hispanic and Latino residents comprise 41.1 percent of the San Joaquin Urban County population, but account for 28.6 percent of loan applications, and only 27.1 percent of approved applications. This discrepancy also exists for Non-Hispanic White residents, although to a lesser extent. Non-Hispanic White residents comprise 39.6 percent of the population, but 34.0 percent of loan applications. However, unlike for Hispanic and Latino residents, the approval rate for Non-Hispanic White residents exceeds the rate at which they apply for conventional loans. This discrepancy between representation and approval rates does not exist for any of the other racial or ethnic groups, and application rates are roughly equal to representation for all other groups as well. The gap between representation and application and approval rates for government-insured loans also only exists for Hispanic and Latino residents and Non-Hispanic White residents. There is a 7.4 percentage point gap between the approval rate and portion of Non-Hispanic White residents in the Urban County, and a smaller, 4.7 percentage point gap between the approval rate and representation of Urban County Hispanic and Latino residents.

As shown in Figure 18, approval rates for Above Moderate-Income households (i.e., those with incomes more than 120 percent of AMI) are much higher than those for all other income groups. Above-Moderate households applied for conventional loans and government-insured loans at rates of 62.0 and 47.8 percent, respectively, compared to 21.8 percent and 31.2 percent for Moderate-Income households. For Moderate-Income households, the application rates exceed the proportion of such households in the Urban County, which is 18.1 percent. However, Moderate-Income households apply for government-insured loans at the highest rate among all income groups, which suggests that in the Urban County, Moderate-Income households may struggle to purchase a home with conventional loans. Finally, a disproportionately low number of Extremely Low-, Very Low-, and Low-Income households applied for either conventional or government-issued loans.

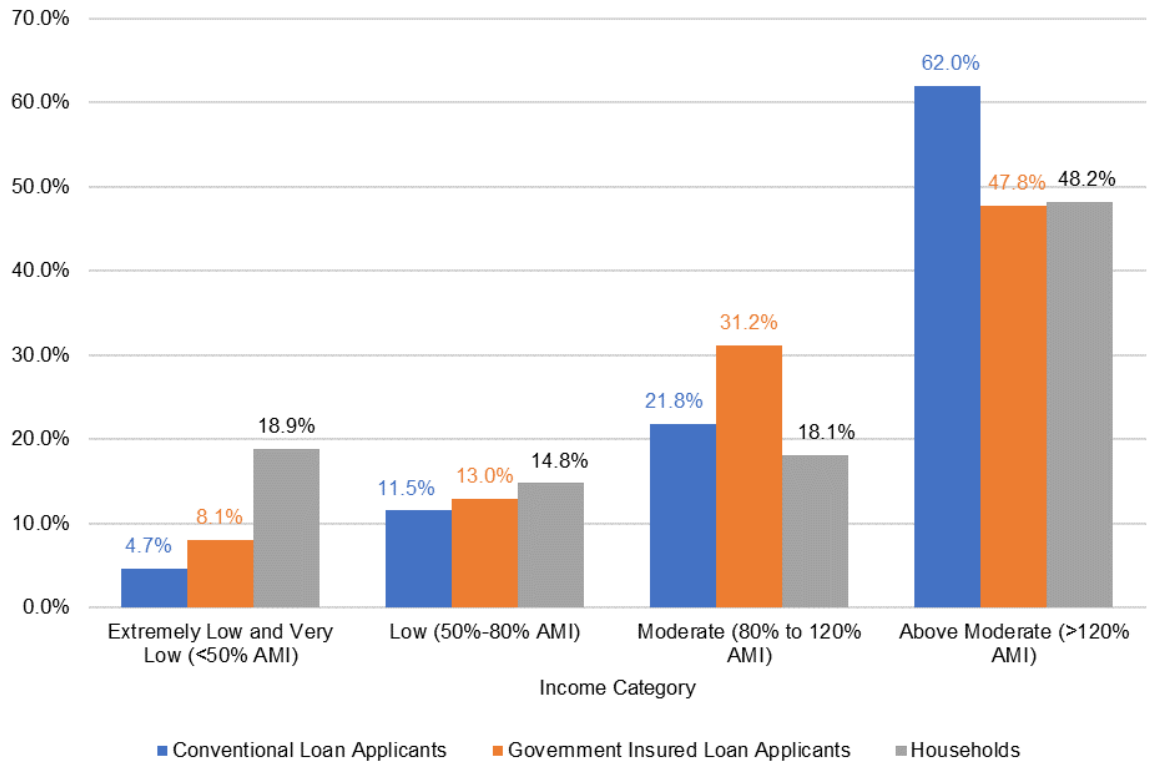
Figure 17: Loan Origination and Denial Rates by Race and Ethnicity, San Joaquin Urban County, 2018



Notes:
(a) Includes applicants that identify as non-Hispanic and Hispanic
(b) Excludes refinance loans and those originated by lenders not subject to HMDA.
(c) Excludes applications that were withdrawn and files that were closed due to incompleteness.
(d) Includes FHA, USDA, and VA home loans on single-family (one to four units) and single-family manufactured dwellings.

Sources: FFIEC, Home Mortgage Disclosure Act data, 2018; BAE, 2020.

Figure 18: Loan Applications by Income Category, San Joaquin Urban County, 2018



Sources: FFIEC, Home Mortgage Disclosure Act data, 2018; BAE, 2020.

Table 32: Disposition of Home Loans by Income Category and Race/Ethnicity, San Joaquin Urban County, 2018

	Less than 50% AMI		50% to 79% of AMI		80% to 99% of AMI		100% to 119% of AMI		120% of AMI or More		All Income Levels		
	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	Total
Conventional Loans (c)													
Applications Received	352	708	729	1,694	727	1,571	703	1,498	4,585	8,286	7,096	13,757	20,853
Withdrawn or Incomplete	97	169	133	334	141	284	114	258	756	1,610	1,241	2,655	3,896
% Withdrawn or Incomplete	28%	24%	18%	20%	19%	18%	16%	17%	16%	19%	17%	19%	19%
Valid Applications (d)	255	539	596	1,360	586	1,287	589	1,240	3,829	6,676	5,855	11,102	16,957
Applications Approved	115	217	377	738	411	810	419	830	2,793	4,724	4,115	7,319	11,434
% Valid Applications	45%	40%	63%	54%	70%	63%	71%	67%	73%	71%	70%	66%	67%
Loans Originated	110	202	363	701	399	774	401	798	2,704	4,504	3,977	6,979	10,956
% Valid Applications	43%	37%	61%	52%	68%	60%	68%	64%	71%	67%	68%	63%	65%
Purchased Loans	5	10	34	77	50	76	49	79	345	412	483	654	1,137
% Valid Applications	2%	2%	6%	6%	9%	6%	8%	6%	9%	6%	8%	6%	7%
Applications Denied (d)	135	312	185	545	125	401	121	331	691	1,540	1,257	3,129	4,386
% Valid Applications	53%	58%	31%	40%	21%	31%	21%	27%	18%	23%	21%	28%	26%
Government Insured Loans (c)(e)													
Applications Received	173	298	203	483	257	618	215	573	857	1,614	1,705	3,586	5,291
Withdrawn or Incomplete	49	101	55	117	75	162	67	121	195	380	441	881	1,322
% Withdrawn or Incomplete	28%	34%	27%	24%	29%	26%	31%	21%	23%	24%	26%	25%	25%
Valid Applications (d)	124	197	148	366	182	456	148	452	662	1,234	1,264	2,705	3,969
Applications Approved	77	106	100	226	136	324	118	346	523	970	954	1,972	2,926
% Valid Applications	62%	54%	68%	62%	75%	71%	80%	77%	79%	79%	75%	73%	74%
Loans Originated	71	100	94	215	132	305	116	319	510	929	923	1,868	2,791
% Valid Applications	57%	51%	64%	59%	73%	67%	78%	71%	77%	75%	73%	69%	70%
Purchased Loans	0	5	5	12	5	21	14	17	34	33	58	88	146
% Valid Applications	0%	3%	3%	3%	3%	5%	9%	4%	5%	3%	5%	3%	4%
Applications Denied (d)	47	86	43	128	41	111	16	89	105	231	252	645	897
% Valid Applications	38%	44%	29%	35%	23%	24%	11%	20%	16%	19%	20%	24%	23%

Notes:
(a) Includes applicants that identify as non-Hispanic White.
(b) Includes applicants that identify as non-White or Hispanic.
(c) Excludes refinance loans and those originated by lenders not subject to HMDA.
(d) Excludes applications that were withdrawn and files that were closed due to incompleteness.
(e) Includes FHA, USDA, and VA home loans on single-family (one to four units) and single-family manufactured dwellings.

Sources: FFIEC, Home Mortgage Disclosure Act data, 2017; BAE, 2019.

Subprime Loans and Predatory Mortgage Lending

Subprime lending refers to the issuance of loans to persons who are less credit-worthy than those typically offered credit, known as prime borrowers. Subprime mortgage lending inherently carries greater risk for the lender, and to mitigate that risk, subprime loans carry terms and conditions less favorable to the borrower because the borrower is less qualified to take on a loan due to credit history, employment, and debt-to-income ratio levels. Subprime loans can be a valuable tool for community development, particularly in communities that are underserved by traditional financial institutions. However, as was made apparent during the recent housing crisis, the subprime market poses certain risks for predatory lending. The California Analysis of Impediments also indicates that subprime and predatory lending activity often disproportionately impacts low-income populations and communities of color.[11]

Though subprime loans represent an important tool for serving the financial needs of the underbanked and those of limited assets and income, these financial tools are often issued in such a way as to constitute a predatory practice. The California Reinvestment Coalition (CRC) defines predatory mortgage lending as including excessively high interest rates, points or fees, and unnecessarily burdensome terms. Using misleading and/or aggressive sales tactics, predatory lenders tend to target persons that may be uneducated regarding financial management and commercial lending, which often also corresponds to lower-income populations, the elderly, and people of color. Predatory practices often target vulnerable neighborhoods and populations, marketing financial instruments known as "flipping mortgages" that are designed to be refinanced much too frequently, as well as instituting prepayment penalties, overly high fees, balloon (i.e., interest only) payment structures, and deceptive mortgages with adjustable rate schedules. In the run-up to the 2008 housing crisis, many such lenders also failed to accurately confirm the borrower's ability to pay. These types of practices are shown to lead to greater mortgage foreclosure risk, notwithstanding other risk factors, and are far more prevalent in the subprime market than in the conventional or federally backed mortgage market.

While the prevalence of subprime loans and predatory lending practices has decreased somewhat in the years since the 2008 housing crisis, service providers in San Joaquin County report a continued need for homebuyer education for lower-income home buyers. Visionary Home Builders provides housing counseling services to lower-income buyers, including assisting buyers in identifying an affordable mortgage amount that might be lower than the loan amount that a bank is willing to lend. Service providers report that additional homebuyer education resources could help prevent foreclosure among first-time homebuyers.

[11] California Department of Housing and Community Development. (2020). Analysis of Impediments to Fair Housing. Available at: https://www.hcd.ca.gov/policy-research/plans-reports/docs/final2020ai.pdf

SECTION 4 – FAIR HOUSING ASSESSMENT

4.1 – Fair Housing Compliance and Enforcement

Fair Housing Complaints

Complaints alleging housing discrimination can be filed at either the state or federal level. Federal housing discrimination complaints are filed with the HUD Office of Fair Housing and Equal Employment Opportunity (FHEO). The FHEO administers the Fair Housing Assistance Program (FHAP), which awards and manages the program grants and works with lawmakers to develop and refine fair housing legislation. Formal complaints can be filed either with the central HUD office, or at any of the field offices located within each state.

FHEO data from 2015 to 2020 (YTD) shows there were 24 total housing complaints in the San Joaquin Urban County, although there were no complaints from households living in Escalon, Lathrop, or Ripon. Four complaints, or 16.7 percent of all complaints received, were conciliated or settled, while 15, or 62.5 percent, were determined to have no cause. Other complaints were dismissed because the office was unable to locate the complainant, there was a lack of jurisdiction, or the complaint was withdrawn without or after resolution. There were no complaints for incidents in the Urban Counties filed with FHEO in 2019.

Housing discrimination complaints can also be filed with the California Department of Fair Employment and Housing (DFEH), which receives and investigates complaints filed under the California Fair Employment and Housing Act (FEHA), Unruh Civil Rights Act, Disabled Persons Act, and the Ralph Civil Rights Act. The DFEH has jurisdiction over both private and public entities operating in California. The department investigates discrimination complaints through five district offices which handle all employment, housing, public accommodations, and hate violence cases, along with special investigations associated with systemic discrimination. The department also conducts outreach and advocacy through a variety of channels. The nearest DFEH office is located on Kausen Drive in Elk Grove, California.

Table 33: FHEO Fair Housing Complaints by Resolution Type, San Joaquin Urban County, 2015-2019

City of Manteca

	Year Resolved						Total,	Percent
Resolution	2015	2016	2017	2018	2019	YTD 2020	**All Years**	**of Total**
Conciliated/Settled	0	1	1	0	0	0	2	40.0%
No Cause	0	2	1	0	0	0	3	60.0%
Subtotal, All Complaints	**0**	**3**	**2**	**0**	**0**	**0**	**5**	**100.0%**

City of Tracy

	Year Resolved						Total,	Percent
Resolution	2015	2016	2017	2018	2019	YTD 2020	**All Years**	**of Total**
No Cause	1	1	2	3	0	0	7	58.3%
Unable to Locate Complainant	0	1	0	0	0	0	1	8.3%
Lack of Jurisdiction	1	0	0	0	0	0	1	8.3%
Withdrawal After Resolution	2	0	1	0	0	0	3	25.0%
Subtotal, All Complaints	**4**	**2**	**3**	**3**	**0**	**0**	**12**	**100.0%**

Unincorporated San Joaquin County

	Year Resolved						Total,	Percent
Resolution	2015	2016	2017	2018	2019	YTD 2020	**All Years**	**of Total**
Conciliated/Settled	0	0	1	1	0	0	2	28.6%
No Cause	0	0	2	0	0	3	5	71.4%
Subtotal, All Complaints	**0**	**0**	**3**	**1**	**0**	**3**	**7**	**100.0%**

San Joaquin Urban County

	Year Resolved						Total,	Percent
Resolution	2015	2016	2017	2018	2019	YTD 2020	**All Years**	**of Total**
Conciliated/Settled	0	1	2	1	0	0	4	16.7%
No Cause	1	3	5	3	0	3	15	62.5%
Unable to Locate Complainant	0	1	0	0	0	0	1	4.2%
Lack of Jurisdiction	1	0	0	0	0	0	1	4.2%
Withdrawal After Resolution	2	0	1	0	0	0	3	12.5%
Total, All Complaints (b)	**4**	**5**	**8**	**4**	**0**	**3**	**24**	**100.0%**

Notes:
(a) There were no complaint data for Escalon, Lathrop, and Ripon.

Sources: HUD, Office of Fair Housing and Equal Opportunity, 2020; BAE, 2020.

DFEH Fair Housing Complaint data from 2015 to 2020 (YTD) included 23 complaints, 43 reports of discriminatory practices, and 24 complaints that were resolved. The number of complaints and reports of discriminatory practices exceeds the number of resolutions because each complaint can span more than one basis or discriminatory practice. The most common basis for complaints was disability-related, accounting for 43.5 percent of complaints in the Urban County, while Race/Color accounted for another 21.7 percent of complaints. The most common discriminatory practice is the denial of reasonable accommodation, followed by evictions. The denial of a rental/lease/sale and the denial of equal terms and conditions each account for 16.3 percent of complaints. Notably, 83.3 percent of all complaints were resolved

either because of insufficient evidence or because no cause was determined. This may be evidence of relatively low rates of discrimination, but also of insufficient enforcement. Finally, the reports of complaints, discriminatory practices and the corresponding resolutions have declined over the past five years, peaking at eight resolutions in 2015, to just one resolution in 2019.

Table 34: DFEH Fair Housing Complaints by Basis, Discriminatory Practice, and Resolution Type, San Joaquin Urban County, 2015-2019

	San Joaquin Urban County							
	Year Filed						Total,	Percent
Basis Type (a)	2015	2016	2017	2018	2019	YTD 2020	All Years	of Total
Race/Color	2	1	1	1	0	0	5	21.7%
Source of Income	0	0	0	1	0	0	1	4.3%
Disability	5	2	2	0	1	0	10	43.5%
Familial Status	0	2	1	0	0	0	3	13.0%
National Origin	0	1	1	0	0	0	2	8.7%
Sex - Pregnancy	0	0	0	0	0	0	0	0.0%
Sex - Gender	0	0	0	0	0	0	0	0.0%
Sex - Gender Identity	0	0	0	0	0	0	0	0.0%
Sexual Orientation	1	0	0	0	0	0	1	4.3%
Association with a member of a protected class	0	0	0	0	0	0	0	0.0%
Sexual Harassment	0	0	0	0	0	0	0	0.0%
Other	0	0	0	1	0	0	1	4.3%
Total, All Complaints	**8**	**6**	**5**	**3**	**1**	**0**	**23**	**100%**
Discriminatory Practice (a)								
Harassed	1	1	2	0	0	0	4	9.3%
Evicted	4	1	2	2	0	0	9	20.9%
Denied rental/lease/sale	1	4	1	1	0	0	7	16.3%
Denied reasonable accommodation	5	2	2	0	1	0	10	23.3%
Denied reasonable accommodation for a disability or medical condition	0	0	0	0	1	0	1	2.3%
Subjected to discriminatory statements/advertisements	2	3	2	0	0	0	7	16.3%
Denied equal terms and conditions	0	0	0	1	1	1	3	7.0%
Subjected to restrictive/covenant	0	0	0	0	0	0	0	0.0%
Other	0	1	0	1	0	0	2	4.7%
Total, All Practices	**13**	**12**	**9**	**5**	**3**	**1**	**43**	**100%**
Resolution								
Complaint Withdrawn by Complainant Without Resolution	0	0	0	0	0	0	0	0.0%
Conciliation/Settlement Successful	0	0	1	0	0	0	1	4.2%
Investigated and Dismissed - Insufficient Evidence	7	3	2	0	0	0	12	50.0%
Investigated and Dismissed - No Basis to Proceed	0	0	0	0	0	0	0	0.0%
Investigated and Dismissed - Withdrawn - Resolved between parties	1	1	0	0	0	0	2	8.3%
No Cause Determination	0	0	3	3	1	1	8	33.3%
Settlement - Settled by Enforcement	0	1	0	0	0	0	1	4.2%
Settlement - Settled by Mediation - Mandatory 1038	0	0	0	0	0	0	0	0.0%
Settlement - Settled by Mediation - Voluntary	0	0	0	0	0	0	0	0.0%
Total, All Resolutions	**8**	**5**	**6**	**3**	**1**	**1**	**24**	**100%**

Note:
(a) Each complaint may involve more than one type or practice, but there is only one resolution per complaint.

Sources: California Department of Fair Employment and Housing, 2020; BAE, 2020.

Section 504 Compliance

Section 504 of the Federal Rehabilitation Act of 1973 prohibits discrimination based on disability in any program receiving federal financial assistance. This includes provisions for providing reasonable modifications in all rules, policies, and procedures. Programs must be readily accessible to, and usable by, individuals with disabilities. Major alterations to existing residential housing projects, or the construction of dwelling units, must include at least five percent of the developed units to be accessible to persons with mobility impairments. Projects must also include at least two percent of the units in such a way as to be accessible to the visually and hearing impaired.

Hate Crimes

The relative prevalence of hate-based crimes within a community can also function as an impediment to fair housing and can represent a fair housing enforcement issue, in cases where hate crimes function as a deterrent to protected classes of individuals who are seeking housing within a certain community, due to fear of harassment or physical harm. Hate crimes, by definition, are committed due to a bias against persons of a certain race, religion, disability, ethnicity, or sexual orientation, among other possible characteristics. The Federal Bureau of Investigations (FBI) Uniform Crime Reporting (UCR) program collects statistics on hate-based crimes that occur throughout the United States. Although data are unavailable for unincorporated San Joaquin County and Lathrop, the rest of the Urban County reported five-year averages between 2013 and 2018 of 2.8 hate crimes per year based on a racial or ethnic motivation, 1.6 hate crimes per year based on a religious bias, 0.2 per year based on sexual orientation, and 0.6 hate crimes per year based on a biases against people with disabilities, as shown in Table 35.

Table 35: Hate Crime Statistics, San Joaquin Urban County, 2013-2018

	San Joaquin Urban County					
	Number of Incidents per Bias Motivation					
Year	Race/ Ethnicity	Religion	Sexual Orientation	Disability	Gender	Gender Identity
2014	3	1	1	1	0	0
2015	2	3	0	0	0	0
2016	5	0	0	0	0	0
2017	2	2	0	0	0	0
2018	2	2	0	2	0	0
5-Year Average	**2.8**	**1.6**	**0.2**	**0.6**	**0.0**	**0.0**

Notes:
(a) There were no hate crime data for the City of Lathrop and the unincorporated San Joaquin County.

Sources: Federal Bureau of Investigation, Uniform Crime (UC) Reporting Program, 2018; BAE, 2020.

4.2 – Fair Housing Services, Education and Outreach

The following sub-section discusses fair housing practices in the ownership and rental housing markets, as well as additional fair housing services provided by local government and non-profit agencies. Since housing discrimination can originate from a wide variety of sources and in a wide variety of situations, it is important to evaluate the actions being taken to address housing discrimination where it exists and, where possible, to prevent its occurrence.

Fair housing services for renters and homebuyers typically include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, tenant-landlord mediation and counseling, and education and outreach activities. The former is primarily carried out by federal and state agencies, as discussed in the prior section. Discrimination auditing and testing, as well as tenant-landlord mediation and counseling, are typically carried out by both local government institutions and non-profit agencies that help to inform both landlords and tenants of their rights and responsibilities under the federal and State laws and provide additional intervention where appropriate. Education and outreach activities, including the dissemination of fair housing information through the distribution of written materials, and the hosting of educational workshops and seminars, is carried out by local governments and non-profits, as well as certain private sector institutions associated with the sale and lease of real property, such as Realtor and landlord associations.

San Joaquin Fair Housing, Inc.

Established in 1983, the San Joaquin Fair Housing Association (SJFH) provides an assortment of fair housing services to the broader San Joaquin County community. Based out of their offices on North El Dorado Street in downtown Stockton, the association offers education, outreach, training, and referral services, as well as tenant-landlord mediation services. SJFH staff also work to facilitate the fair housing complaint submittal and investigation process.

Table 36, below, summarizes the services provided by SJFH. The data were collected from SJFH annual performance reports for fiscal years 2017-2018 through 2019-2020. SJFH conducts advertising and media outreach on several local news outlets, including local access television channels 26 and 97, the Stockton Record, Manteca Bulletin, Tracy Press, and Lodi News Sentinel. Additionally, SJFH conducts outreach on social media platforms including Facebook, Twitter, and Instagram. The organization also regularly distributes fliers at local municipal offices, rental offices and associations, educational institutions, and community-based organizations. In addition, SJFH conducts outreach via community events and tenant/landlord workshops. For example, during the 2019-2020 fiscal year, SJFH hosted two tenant/landlord workshops and also participated in four community events.

Table 36: San Joaquin Fair Housing Accomplishments, FY 17-18 to FY 19-20

	FY 2017-2018	FY 2018-2019	FY 2019-2020
Advertising/Media Outreach	Local Access 26 & 97 Stockton Record Manteca Bulletin Tracy Press Lodi News Sentinel Facebook Twitter Instagram	Same	Same
Flier Distribution	City Code Enforcement City Hall Public Library CalWorks Rental Property Assoc. Cal Rural Legal Assist. El Concillio Delta College Cal Human Dec. Corp. SJC Mental Health Services Annunciation Church Boys and Girls Club Comm. Partners for Families	Same	Same
Individuals Receiving Services	2,601	3,330	6,157
Formal Cases/ Individuals Served	48 / 171	41 / 135	33 / 113
Formal Cases Resolved	23	28	20

Sources: San Joaquin Fair Housing; BAE, 2020.

In addition to providing outreach and education regarding fair housing issues, SJFH provides a variety of direct services to individuals and families. In fiscal year 2017-2018, SJFH provided services to 2,601 individuals living in the Urban County. This number increased to 6,157 during the 2019-2020 fiscal year. Interestingly, the number of cases formally opened by SJFH decreased over this time frame from 48 cases in fiscal year 2017-2018 to 33 cases in fiscal year 2019-2020. The large increase in the number of individuals receiving services and the decrease in the number of cases is likely due in part to the ongoing COVID-19 pandemic, coupled with recent changes in State law. Representatives from SJFH report an increase in calls from both landlords and tenants seeking information on their rights and responsibilities following the passage of AB 1482, which instituted caps on rent increases and just cause eviction protections for many rental units throughout California. More recently, SJFH has been working to advise tenants on working with their landlords in the context of the COVID-19 pandemic, which has caused many households to experience significant financial hardship but also led to a temporary Statewide moratorium on evictions as well as other local eviction

moratoriums. As shown in Table 37, most of SJFH's cases in the San Joaquin Urban County during the fiscal year 2019-2020 affected households in low-income and moderate-income categories. Only one-third of cases were in the extremely low-income and very low-income categories.

The data in Table 37 also indicate that a disproportionate share of SJFH's clients during the 2019-2020 fiscal year were Hispanic or Latino, accounting for two-thirds of all client cases. Staff from SJFH report that the County's Hispanic and Latino population is often subject to intimidation by landlords, including cases in which the landlord believes that tenants are undocumented and threatens to report the household to immigration enforcement. As a result, many Hispanic and Latino residents are reluctant to report issues with their living conditions due to a fear of retaliation from landlords. Some Spanish-speaking tenants with limited English proficiency have also been vulnerable due to an inability to read forms or notices, and SJFH staff report a shortage of resources to assist these households.

As noted previously, the ongoing difficulties that HCV-holders face in securing rental housing suggests that San Joaquin County and the participating Urban County jurisdictions should work to SJFH and other organizations to increase awareness of the newly enacted State law that prevents discrimination of the basis of a tenant's use of HCVs and other forms of housing subsidy or assistance.

Table 37: San Joaquin Fair Housing, San Joaquin Urban County Client Characteristics, FY 2019-2020

	San Joaquin Urban County	
Racial Group (Persons)	**Number of Cases**	**Percent of Total**
White	8	24.2%
Black/African American	4	12.1%
American Indian and Alaska Native	0	0.0%
Asian	0	0.0%
Native Hawaiian and Other Pacific Islander	0	0.0%
Other Multiracial or Did Not Report	21	63.6%
Total, All	**33**	**100.0%**
Ethnic Group (Persons)		
Hispanic or Latino	22	66.7%
Not Hispanic or Latino	11	33.3%
Total, All	**33**	**100.0%**
Special Needs Group		
Disabled HH Member	5	15.2%
Senior Headed Household	0	0.0%
Female Headed Household	16	48.5%
Five or More Member Household	8	24.2%
UD	1	3.0%
Veteran HH Member	0	0.0%
Homeless	1	3.0%
COVID-19	2	6.1%
Total, All	**33**	**100.0%**
Income Category (Households)		
Extremely Low-Income (<30% AMI)	6	18.2%
Very Low-Income (30%-50% AMI)	5	15.2%
Low-Income (50%-80% AMI)	7	21.2%
Moderate-Income (>80% AMI)	15	45.5%
Total, All	**33**	**100.0%**

Sources: San Joaquin Fair Housing, 2020; BAE, 2020.

4.3 – Evaluation of 2015-2019 AI Report Actions

The following section details the accomplishments and efforts to further fair housing choice within the San Joaquin Urban County during the 2015-2020 planning period. Note that actions recommended in the 2015-2020 AI were developed for joint implementation by jurisdictions throughout the San Joaquin Urban County jurisdictions, including the County itself, as well as the cities of Escalon, Lathrop, Manteca, Ripon, and Tracy. Nonetheless, as two of the largest population centers in the county, some recommendations were also implemented in cooperation with the cities of Lodi and Stockton, which are not included in the Urban County. The accomplishments and efforts described below for each action are based on those reported in the Performance and Evaluation Reports submitted by San Joaquin County to HUD as part of the monitoring and evaluation process for the 2015-2020 Consolidated Plan. Additional information was provided by County staff, as appropriate.

Access to Information

Action 1: The County and each participating jurisdiction will provide links through their websites to housing services and resources, fair housing, and consumer information on housing choices. The County and each participating jurisdiction will make available such information at local service centers and City/County offices, public libraries, and other public facilities.

Response: The County and the cities of Lathrop, Manteca, and Tracy have established links on their websites to direct visitors to the SJFH website and to websites associated with other housing-related organizations. Additionally, SJFH distributes flyers at key locations such as City/County offices, public libraries, CalWorks, Delta College, El Concilio, and rental property associations, just to name a few.

Action 2: The County and each participating jurisdiction will provide education on fair housing to County and City staff members who administer and oversee housing programs and code enforcement activities so that they can respond to phone calls from the public about fair housing and landlord/tenant issues.

Response: SJFH works closely on an ongoing basis with City and County code enforcement officials, providing both education and training to local government staff, including a review of methods for responding to in-person and telephone inquiries and complaints regarding fair housing and landlord/tenant issues.

Action 3: The County and each participating jurisdiction will support fair housing service providers (e.g., San Joaquin Fair Housing Association) and other housing service agencies in providing credit counseling, homebuyer counseling and education, and education on tenant rights and responsibilities for households entering or re-entering the rental market, such as formerly homeless households, and those entering the homeownership market.

Response: The Housing Authority conducted several Homebuyer workshops at Housing Authority and non-profit sites throughout the FY 2018-19 reporting period. Additionally, the County's community development staff regularly conducts similar presentations for their GAP Loan program. San Joaquin County Continuum of Care is the lead agency for grant funds under HUD's Continuum of Care (CoC), which is a comprehensive approach to assist individuals and families move from homelessness to self-sufficiency. San Joaquin County Continuum of Care is designed to provide permanent supportive housing opportunities for homeless people with disabilities. During FY 2018-19, permanent supportive housing services for persons with disabilities were provided to 221 persons per month through the CoC Program. A total of $2,276,539 of rent assistance and administration funds were also spent during this reporting period.

Fair Housing Services and Outreach

Action 4: The County and each participating jurisdiction will work with SJFH or a similar organization to design and implement a comprehensive testing program in San Joaquin County to identify the extent of fair housing problems in the county. The results will allow SJFH to target its programs to address the problems identified. SJFH shall seek additional funding, such as special grants, to carry out the testing program as well as pursue partnerships with other organizations, such as University of the Pacific or WorkNet.

Response: As of this writing, there is no fair housing testing program currently in place within San Joaquin County.

Action 5: The County and each participating jurisdiction will continue to work with the fair housing service providers (e.g., San Joaquin Fair Housing Association), the Housing Authority, and local apartment and realtor associations to reach out to landlords and managers of smaller rental properties. This outreach may include updating mailing lists of smaller rental landlords and managers to provide informational material regarding fair housing rights and responsibilities, including rights of persons with disabilities; and conducting fair housing workshops.

Response: San Joaquin County and other participating jurisdictions have continued to collaborate on an ongoing basis to ensure that fair housing service providers, including SJFH, are proactively engaging with members of the local community, including both tenants and property owners/managers.

Action 6: The County and each participating jurisdiction will continue to support the primary fair housing service provider, San Joaquin Fair Housing Association (SJFH), in conducting fair housing workshops for residents, apartment owners, landlords, and property managers. Workshops will include translators who speak Spanish and other appropriate languages. The County shall work with SJFH to update and provide brochures for distribution at local service centers and at city and county offices. The County and each participating jurisdiction will provide phone numbers and referral information to the SJFH on their websites and will make referrals to SJFH as issues/cases come to their attention. The County will encourage the fair housing service provider to coordinate with the real estate and apartment associations regarding fair housing training.

Response: SJFH regularly conducts annual in-person tenant/landlord workshops. In the near term, SJFH plans to schedule future workshops online so that these important workshops can continue during the COVID-19 pandemic.

Action 7: The County and each participating jurisdiction will work with SJFH to increase awareness of the rights of persons with disabilities, ADA issues, reasonable accommodation, and available services.

Response: SJFH provides education on federal and State Fair Housing laws.

Action 8: The County and each participating jurisdiction will continue to comply with antidiscrimination requirements including, all applicable Federal regulations as demonstrated in the County's application for Community Development Block Grant, HOME, and other federal funds.

Response: The County complies with all antidiscrimination requirements as identified by the applicable legislation and HUD regulations.

Action 9: The County and each participating jurisdiction will continue to implement policies and programs identified in the Housing Element of each jurisdiction and implement Zoning Ordinance amendments necessary to further fair housing. In addition, the following actions need to be taken:

- San Joaquin County should amend the Development Title to update the current definition of "family" to remove the restriction on the number of non-related individuals; and to restrict the development of single-family units in medium- and high-density (i.e., multifamily) zoning districts.
- The City of Escalon should amend the zoning ordinance to update the current definition of "family" to remove the restriction on a group of unrelated persons; and to restrict the development of single-family units in medium- and high-density (i.e., multifamily) zoning districts.
- The City of Lathrop should amend the zoning ordinance to update the current definition of "family" to remove the restriction on the number of non-related individuals; to restrict the development of single-family units in medium- and high-density (i.e., multifamily) zoning districts; and to comply with State law regarding density bonus provisions.
- The City of Ripon should amend the zoning ordinance to update the current definition of "family" to remove the restriction on the number of non-related individuals; and to restrict the development of single-family units in multifamily zoning districts.
- The City of Tracy should amend the zoning ordinance to update the current definition of "family" to remove the restriction on the number of non-related individuals; and to restrict the development of single-family units in medium- and high-density (i.e., multifamily) zoning districts.

Response: A review of the current adopted zoning ordinances for each participating jurisdiction indicates that the cities of Tracy, Manteca, and Escalon have definitions of

"family" that fully comply with State and federal law. The definitions in both San Joaquin County and the City of Ripon zoning codes are not in compliance with State and federal law, as both define "family" as requiring an association by blood relation or marriage, or a group of not more than five unrelated persons. The definition of a "family" used in the City of Lathrop zoning code is likely to be sufficiently broad to comply with applicable laws. In addition, the City of Lathrop currently complies with State law regarding density bonus provisions.

SECTION 5 – RECOMMENDED ACTIONS

The recommended action items for the 2020-2025 reporting period address issues and opportunities related specifically to fair housing issues, though they are only one component of housing policy and programs that are implemented by jurisdictions within the Urban County. While some action items have been carried over from the previous reporting period, some are augmented actions intended to address new challenges that have arisen over the past five years. Table 19 provides a matrix of the action items for the 2020-2025 reporting period.

Access to Information

Action 1: The County and each participating jurisdiction will provide links through their websites to housing services and resources, fair housing, and consumer information on housing choices. The County and each participating jurisdiction will make available such information at local service centers and City/County offices, public libraries, and other public facilities.

Action 2: The County and each participating jurisdiction should provide education on fair housing to County and City staff members who administer and oversee housing programs and code enforcement activities so that they can respond to inquiries and complaints from the public about fair housing and landlord/tenant issues.

Action 3: The County and each participating jurisdiction will support fair housing service providers (e.g., San Joaquin Fair Housing Association) and other housing service agencies in providing credit counseling, homebuyer counseling and education, and education on tenant rights and responsibilities for households entering or re-entering the rental market, such as formerly homeless households, and those entering the homeownership market.

Fair Housing Services and Outreach

Action 4: The County and each participating jurisdiction will work with SJFH or a similar organization to design and implement a comprehensive testing program in San Joaquin County to identify the extent of fair housing problems throughout the Urban County. The results will allow SJFH to target its programs to address the problems identified. SJFH shall seek additional funding, such as special grants, to carry out the testing program as well as pursue partnerships with other organizations, such as University of the Pacific or WorkNet.

Action 5: The County and each participating jurisdiction will continue to work with the fair housing service providers (e.g., SJFH), the Housing Authority, and local apartment and Realtor associations to reach out to landlords and managers of smaller rental properties. This outreach may include updating mailing lists of smaller rental landlords and managers to

provide informational material regarding fair housing rights and responsibilities, including the rights of persons with disabilities; and conducting fair housing workshops.

Action 6: The County and each participating jurisdiction will continue to support the primary fair housing service provider, SJFH, in conducting fair housing workshops for residents, apartment owners, landlords, and property managers. Workshops will include translators who speak Spanish and other appropriate languages. The County shall work with SJFH to update and provide brochures for distribution at local service centers and at city and county offices. The County and each participating jurisdiction will provide phone numbers and referral information to the SJFH on their websites and will make referrals to SJFH as issues/cases come to their attention. The County will encourage the fair housing service provider to coordinate with the real estate and apartment associations regarding fair housing training.

Action 7: The County and each participating jurisdiction will work with SJFH to increase awareness of the rights of persons with disabilities, ADA issues, reasonable accommodation rights and requirements, and available services and resources.

Action 8: The County and each participating jurisdiction will continue to comply with antidiscrimination requirements including all applicable State and federal regulations, including those associated with the Community Development Block Grant, HOME, and other federal entitlement programs and newly enacted California SB 329.

Action 9: The County will work with SJFH to explore establishing an anonymous complaint forum for tenants that may fear retaliation if they report housing problems. Properties that are the subject of anonymous complaints could then be subject to monitoring and testing.

Public Policies and Programs

Action 10: The County and each participating jurisdiction will continue to implement policies and programs identified in the Housing Element of each jurisdiction and implement Zoning Ordinance amendments necessary to further fair housing. In addition, the following actions need to be taken:

- San Joaquin County should amend the Development Title to update the current definition of "family" to remove the restriction on the number of non-related individuals; and to restrict the development of single-family units in medium- and high-density (i.e., multifamily) zoning districts.
- The City of Lathrop should amend the zoning ordinance to update the current definition of "family" to remove the restriction on the number of non-related individuals; to restrict the development of single-family units in medium- and high-

density (i.e., multifamily) zoning districts; and to comply with State law regarding density bonus provisions.

- The City of Ripon should amend the zoning ordinance to update the current definition of "family" to remove the restriction on the number of non-related individuals; and to restrict the development of single-family units in multifamily zoning districts.

Action 11: The County and each participating jurisdiction must ensure full compliance with State law regarding second units on land zoned for single-family residential development:

- The City of Tracy should evaluate whether the exclusion of second units in zones designated for Residential Mobile Homes (RMH) complies with State law and if not, amend the zoning ordinance to ensure full compliance.
- The City of Lathrop should proceed with approving the amendment to the zoning ordinance that officially permits second units on land zoned for Single-Family Residential (R-MV, RX-MV) in the Mossdale Village development.

Action 12: The County and each participating jurisdiction should encourage the establishment of additional licensed community care facilities – particularly in unincorporated parts of the County – to decentralize the location of such facilities, which are predominantly located within the cities of Stockton and Lodi. Nonetheless, such facilities should, to the extent feasible, be cited in locations with access to desired amenities, such as health care and retail services.

Action 13: San Joaquin County should monitor and assess the needs of farmworker households and work with Urban County jurisdictions to facilitate the creation of more appropriate and affordable housing opportunities for farmworker households.

Action 14: The County and each participating jurisdiction should monitor the availability of units adequately sized for larger lower-income households, such as three-bedroom rentals. All jurisdictions should consider actions to facilitate development and preservation of such units.

Action 15: The County should update the 2004 housing conditions survey to reassess the state of the existing housing stock.

Action 16: The County and participating jurisdictions should implement streamlined approvals for residential developments that provide affordable housing, including by-right approvals for 100 percent affordable developments.

Action 17: The County and participating jurisdictions should evaluate and identify potential sources of local gap funding for affordable housing development, including but not limited to affordable housing bonds, affordable housing impact fees, and/or a vacant land tax.

Action 18: The County should evaluate and identify potential sources of funding for landlord incentive payments to encourage private landlords to accept HCVs, coupled with education about the anti-discrimination requirements of SB 329.

Action 19: The County and each participating jurisdiction should review development standards and residential site availability to facilitate the attraction of well-qualified market-rate and affordable housing developers. This action could be implemented as part of each jurisdiction's upcoming Housing Element Update process.

Action 20: The County should explore opportunities to work with nonprofit housing providers to acquire and rehabilitate foreclosed properties and properties in default and rent or sell the rehabilitated properties to low- and moderate-income households.

APPENDIX A – KEY INFORMANT INTERVIEWS

The list below identifies those organizations that are active in affordable and fair housing issues and were invited to participate in key informant interviews for the purposes of developing the San Joaquin County 2020-2025 AI. Organizations shown with an asterisk are those that participated in key informant interviews.

- Central Valley Association of Realtors
- Central Valley Low Income Housing Corporation*
- Central Valley Mortgage
- City of Escalon*
- City of Lathrop*
- City of Manteca*
- City of Ripon*
- City of Tracy
- Housing Authority of the County of San Joaquin*
- Lutheran Social Services
- Sacramento Self Help Housing
- San Joaquin Fair Housing, Inc.*
- STAND Affordable Housing*
- Visionary Home Builders*