

## 2022-2023 ANNUAL ACTION PLAN

Economic Development Department  
Housing Division  
400 East Main Street  
Stockton, CA 95202  
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## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

This Annual Action Plan outlines the activities which will be undertaken during the program year beginning July 1, 2022, and ending June 30, 2023, using the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) program funds that are received by the City of Stockton from the U.S. Department of Housing and Urban Development (HUD). The Action Plan describes how the City will address the proposed priority goals, activities, planned outcomes, and budget for the new fiscal year and the funding resources allocated to housing

and community development projects to meet its established goals as identified in the City's Five Year 2020-2025 Consolidated Plan

#### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Annual Action Plan for the 2022-2023 program year identifies the various activities and projects that will be implemented and funded under the CDBG, ESG, and HOME federal programs to meet the goals and objectives identified in the Five-Year Consolidated Plan (FY 2020-2025). The City anticipates allocating \$3.129 million in CDBG funding, \$1.82 million in HOME funding, and \$284,000 in ESG funding. The objectives and outcomes that are anticipated from the implementation of the 2022-2023 Action Plan are identified in AP-20 and AP-35.

The City will fund 19 grants to 18 agencies that will assist low-income persons and address the City's five primary goals and priorities to guide efforts to address Stockton's priority housing and community development needs:

- Housing Services for the Homeless. Provide housing and services for the City's homeless population, including homelessness prevention. *Increase and maintain transitional housing*

*opportunities. Expand housing first model to provide permanent housing units with intense wrap-around services on-site.*

- Affordable Housing. Preserve, improve, and expand the supply of quality affordable housing for lower-income households. *Increase the supply of affordable multifamily housing. Provide homeownership opportunities for first-time buyers. Assist existing low-income owner-occupied households to keep their homes safe and well maintained by providing rehabilitation assistance.*
- Services for Special Needs. Provide supportive services necessary to meet the needs of the City's non-homeless special needs populations. *Improve community health care, including basic and specialty care. Support and expand programs and opportunities that engage seniors as well as youth.*
- Support Economic Development. Promote economic development activities that create, attract, and retain jobs and promote economic activity and vitality, especially those that provide economic opportunities for low- and moderate-income persons. *Prioritize and expand job readiness programs targeting low-income youth, disabled persons, and homeless persons;*
- Public Services. Ensure the provision of high-quality public services to support ongoing community development, including the provision of funding for fair housing services, among other activities. *Actively and faithfully promote fair housing and investigate housing discrimination. Prioritize the maintenance and improvement of municipal services, facilities, and infrastructure.*

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City's Housing Division of the Economic Development Department annually monitors Subrecipient agencies that are recipients of the division's Federal Grant funds. Staff reviews the agencies programmatic, fiscal management, and performance goals; this information is factored into the Community Development Committee's (CDC) discussion and evaluation of the agencies future request for funding through the annual grant application process. The CDC and staff also use this information to recommend grant funding to the City Council.

The City's performance relative to its annual objectives can be reviewed in the Consolidated Annual Performance and Evaluation Report (CAPER) that is prepared following the completion of the fiscal year and submitted to HUD.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.



The goals and priorities in the FY 2022-23 Action Plan were developed through a series of public hearings and outreach conducted by the City and the Community Development Committee when developing the Five-Year Consolidated Plan FY 2020-2025.

The planning process for the development of this Annual Action Plan began in December 2021 with published notices and direct e-mails to the City's housing and community development distribution list providing notification that the City was accepting applications for funding under the CDBG, ESG, and HOME programs through January 31, 2022. The notifications reached over two hundred agencies, individuals, and stakeholders.

HUD regulations for the development of the Consolidated Plan, which is the basis for the Annual Action Plan requires jurisdictions to reach out to, and consult with, other public and private agencies and organizations to collect information regarding need, to identify available resources and gaps in the institutional delivery structure, and to coordinate the development of funding allocation priorities, performance standards, and evaluation outcomes. To prepare the Consolidated and Action Plans, the City's consultant met one-on-one with agencies and organizations located throughout the city and county, including public and assisted housing providers, an assortment of government agencies, as well as private and public health, mental health, and social service agencies. Additionally, the City held four focus group meetings with stakeholders other than those targeted for direct consultation, though anyone with an interest in the Consolidated Plan was encouraged to attend. The focus groups were organized around four general topic areas that expanded beyond the content covered by the one-on-one consultations. These included housing, business development, economic development, and issues pertinent to the Central City. The focus group meetings were open to the public and advertised in the local newspaper. City staff also reached out to a variety of stakeholders directly to encourage their participation. In most cases, the consultations and focus group discussions represented a continuation of the ongoing interactions and dialogue between the City and local stakeholder groups.

The City held an application workshop in December 2021. Notices regarding the workshop were mailed directly to agencies on the City's Economic and Housing distribution list and published in the local newspaper 'The Record' prior to the workshop.

Following the application submission period of January 24, 2022, funding requests were reviewed by staff and members of the CDC. Applications were reviewed for compliance with appropriate Federal regulations, Council-adopted local community development objectives, and consistency with the priorities and objectives contained in the 2022-2023 Consolidated Plan.

The public will have two opportunities to review the proposed FY 2022-23 Action Plan. A 30-day public review period on the draft FY 2022-23 Action Plan will occur from April 3, 2022, through May 3, 2022. Furthermore, the draft Action Plan will be reviewed at a public hearing at the City Council's May 3, 2022, meeting. The public hearing was noticed to the public in The Record as well as the local Spanish

newspaper, Latino Times. The draft Stockton Action Plan was made available for public review at the Economic Development Department front counter and online.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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A summary of the public comments to the Annual Action Plan will be included as an attachment to this Plan at the conclusion of the public review period on May 3, 2022. It will include any public comments received at the Stockton City Council's Public Hearing held on May 3, 2022.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

Not applicable, all comments are received for consideration.

## **7. Summary**

The Stockton 2020-2025 Consolidated Plan and Annual Action Plan represent refined and updated versions of the City's prior planning document and therefore do not represent a major shift in strategic direction. Programs to preserve, enhance, and increase the supply of housing affordable to lower-income households remain a priority; however, emphasis is placed on a holistic approach to overall community development. This entails providing housing opportunities for vulnerable populations, and emergency shelter and transitional housing as a priority. The Consolidated Plan supports these residents by fostering a system of supportive services, and by directing public investments, such as improved public infrastructure, facilities, and services, where they can benefit the City's lower- and moderate-income populations. At the same time, efforts to provide expanded business assistance and educational opportunities for workers and entrepreneurs will help to provide increased opportunities for residents to improve their economic self-sufficiency, so that resources made available pursuant to the Consolidated Plan can be provided to those most in need of assistance.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	STOCKTON	Economic Development Department
HOME Administrator	STOCKTON	Economic Development Department
ESG Administrator	STOCKTON	Economic Development Department

**Table 1 – Responsible Agencies**

### Narrative (optional)

The Economic Development Department of the City of Stockton is responsible for preparing the Consolidated Plan, the Annual Action Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER). The Economic Development Department consists of several divisions, which work together to administer the CDBG, HOME, and ESG programs. The Housing Division functions as the primary lead, providing coordination with other divisions as necessary and appropriate. In addition, staff also collaborates with an extensive network of governmental agencies and non-profit organizations to facilitate strategic planning and implementation of Consolidated Plan goals and objectives.

### Consolidated Plan Public Contact Information

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The planning process required under HUD regulations for the development of the Action Plan requires jurisdictions to reach out to, and consult with, other public and private agencies and organizations to collect information on need, to identify available resources and gaps in the official delivery structure, and to coordinate the development of funding allocation priorities, performance standards, and evaluation outcomes. The Plan itself must include a summary of the consultation process, including the identification of participating agencies and organizations, as well as a summary of efforts to enhance coordination between public and private entities.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

To facilitate the preparation of the Consolidated Plan, the City of Stockton consulted one-on-one with various agencies and organizations located throughout the city and county, including public and assisted housing providers and developers, an assortment of government agencies, as well as private and public health, mental health, and social service agencies. These consultations represent a continuation of ongoing interactions between the City and the agency or organizations described. For a complete list of those contacted for participation in Consolidated Plan consultations, please refer to Table 2, below.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Consultation and coordination with the Continuum of Care (CoC) representatives is a fundamental component of the plan development process. Efforts to address the needs of homeless persons are described in greater detail throughout the remainder of the Consolidated Plan. The San Joaquin County Community Development Department is the lead agency for the San Joaquin County Continuum of Care (CoC), which represents a consortium of local government agencies and non-profit organizations, encompassing all jurisdictions in San Joaquin County, including the City of Stockton. In addition to coordinating plan development with the available information from the CoC application, the City also conducted consultations with a variety of consortia members, including San Joaquin County, the Central Valley Low Income Housing Corporation (CVLIHC), the Stockton Shelter for the Homeless, the Women's Center - YFS, and Dignity's Alcove Veterans Housing, among other important organizations and agencies.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate**

**outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

As the largest city within the San Joaquin CoC area, the City of Stockton maintains a seat on the CoC governing body and participates in consultation with the San Joaquin County Community Development Department, and other participating agencies and organizations, regarding the coordination of ESG funding, including how ESG funds are allocated and the identification of performance standards and evaluation outcomes. Under the CoC, the primary contact for the collaborative application is the CoC administrator, Adam Cheshire, while the Central Valley Low Income Housing Corporation (CVLIHC) is responsible for the administration of the Homeless Management Information System (HMIS).

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Arnaiz Development Company, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was invited to participate in the focus group discussions, followed up by a one-on-one phone call. The anticipated outcome was to collect information regarding the ability of private housing developers to provide new housing within the city, particularly quality affordable housing, and to identify any barriers to the provision of housing.
2	<b>Agency/Group/Organization</b>	Catholic Charities of the Diocese of Stockton
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was invited to participate in the consultation process by the San Joaquin County Aging and Community Services Division of the County's Health and Human Services Agency. The anticipated outcome was to collect information regarding social service, public facility, and housing needs for elderly and disabled residents, and to improve coordination with the non-housing community development strategy and anti-poverty strategy, among others.

3	<b>Agency/Group/Organization</b>	Central Valley Low Income Housing Corporation
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process as a lead participant in the Continuum of Care. The anticipated outcome was to collect information regarding resources available for, and the needs of, homeless and at-risk populations, as well as to improve coordination with the housing, homelessness, and anti-poverty strategies.
4	<b>Agency/Group/Organization</b>	Conway Homes Resident Council
	<b>Agency/Group/Organization Type</b>	Housing Civic Leaders



	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Resident Council President for Conway Homes, one of the Housing Authority of San Joaquin (HACSJ) public housing developments in Stockton, was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and service needs of public housing residents, as well as to improve coordination of the anti-poverty and non-housing community development strategies, among others.
5	<b>Agency/Group/Organization</b>	Dignity's Alcove
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy Market Analysis Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and social services available to veterans, as well as to improve coordination with the Consolidated Plan homelessness and anti-poverty strategies.
6	<b>Agency/Group/Organization</b>	GOSPEL CENTER RESCUE MISSION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and social service needs of persons experiencing drug and alcohol addictions, as well as to improve coordination with the Consolidated Plan homelessness, non-homeless special needs, and anti-poverty strategy, among other areas.
7	<b>Agency/Group/Organization</b>	Health Plan of San Joaquin County
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Health Regional organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the healthcare, housing, and social service needs of low-income and homeless individuals, as well as to improve coordination with the Consolidated Plan homelessness and anti-poverty strategy, among other areas.
8	<b>Agency/Group/Organization</b>	Housing Authority of the County of San Joaquin
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Other government - County Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Market Analysis Anti-poverty Strategy Lead-based Paint Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process as the certified Public Housing Agency. The anticipated outcome was to collect information regarding public housing resources, conditions, and the needs of tenants, as well as to improve coordination with housing, homelessness, community development, and anti-poverty strategies.
9	<b>Agency/Group/Organization</b>	Lutheran Social Services of Northern California
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding housing and social services needs of youth on the edge of homelessness and to improve coordination with the Consolidated Plan homelessness and anti-poverty strategy, among other areas.

10	<b>Agency/Group/Organization</b>	NEW DIRECTIONS
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and social service needs of persons experiencing drug and alcohol addictions, as well as to improve coordination with the Consolidated Plan homelessness and antipoverty strategy, among other areas.
11	<b>Agency/Group/Organization</b>	San Joaquin County Behavioral Health Services
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Health Agency Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and social service needs of persons with behavioral health issues and those experiencing drug and alcohol addictions, as well as to improve coordination with the Consolidated Plan homelessness and anti-poverty strategy, among other areas.
12	<b>Agency/Group/Organization</b>	San Joaquin County Commission on Aging
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was invited to participate in the consultation process by the San Joaquin County Aging and Community Services Division of the County's Health and Human Services Agency. The anticipated outcome was to collect information regarding social service, public facility, and housing needs of elderly and disabled residents, and to improve coordination with the non-housing community development strategy and anti-poverty strategy, among others.

13	<b>Agency/Group/Organization</b>	San Joaquin County Human Services Department of Aging and Community Services
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Other government - County Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was invited to participate in the focus group discussions, with following up consultation including a conference call with various organizations representing the needs of elderly and disabled residents. The anticipated outcome was to collect information regarding social service, public facility, and housing needs of elderly and disabled residents, and to improve coordination with the non-housing community development strategy and anti-poverty strategy, among others.
14	<b>Agency/Group/Organization</b>	SAN JOAQUIN FAIR HOUSING ASSOCIATION
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding fair housing issues and identify barriers to affordable housing, as well as to improve coordination of the anti-poverty strategy, among others.

15	<b>Agency/Group/Organization</b>	SECOND HARVEST FOOD BANK
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding met and unmet nutrition needs, as well as to improve coordination with the Consolidated Plan anti-poverty strategy.
16	<b>Agency/Group/Organization</b>	Sierra Vista Resident Council
	<b>Agency/Group/Organization Type</b>	Housing Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Resident Council President for Sierra Vista, one of the Housing Authority of the County of San Joaquin(HASJs) public housing developments in Stockton, was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and service needs of public housing residents, as well as to improve coordination the anti-poverty and non-housing community development strategies, among others.
17	<b>Agency/Group/Organization</b>	St. Mary's Interfaith Dining Room
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the services provided and to identify gaps in service for homeless and at-risk populations, as well as to improve coordination with the housing, homelessness, and anti-poverty strategies.
18	<b>Agency/Group/Organization</b>	STAND Affordable Housing
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information the housing market, barriers to affordable housing development, and the connection between housing and public safety, as well as to improve coordination with the Consolidated Plan housing and antipoverty strategies.
19	<b>Agency/Group/Organization</b>	Stockton Emergency Food Bank
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding met and unmet nutrition needs, as well as to improve coordination with the Consolidated Plan anti-poverty strategy.
20	<b>Agency/Group/Organization</b>	Stockton Shelter for the Homeless
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with HIV/AIDS Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and social service needs of homeless individuals in Stockton, as well as to improve coordination with the Consolidated Plan housing, homelessness and anti-poverty strategies, among other areas.
21	<b>Agency/Group/Organization</b>	University of the Pacific's Thomas J. Long School of Pharmacy and Health Sciences
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was invited to participate in the consultation process by the San Joaquin County Aging and Community Services Division of the County's Health and Human Services Agency. The anticipated outcome was to collect information regarding social services, public facilities, and housing needs of elderly and disabled residents, and to improve coordination with the non-housing community development strategy and anti-poverty strategy, among others.
22	<b>Agency/Group/Organization</b>	Visionary Home Builders of California, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information the housing market, barriers to affordable housing development.

23	<b>Agency/Group/Organization</b>	Women's Center Youth and Family Services
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was invited to participate in the consultation process. The anticipated outcome was to collect information regarding the housing and social service needs of victims of domestic violence, as well as to improve coordination with the Consolidated Plan housing, homelessness and anti-poverty strategies, among other areas.

### Identify any Agency Types not consulted and provide rationale for not consulting

During Consolidated Plan development, the City of Stockton consulted a wide variety of agencies in depth, including those listed in the table above. During Action Plan development, we posted information on the City's website, Facebook page, sent out flyers to our mailing list of stakeholders, and advertised public hearings in the local newspaper. Going forward, we will enhance these notifications to cast a wider net and encourage additional agencies to participate.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	San Joaquin County Community Development Department	As the largest City in the CoC, the City of Stockton has a seat on the CoC governing body, ensuring coordination with the CoC and the action planning process.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The planning process for the development of this Annual Action Plan began in December 2021 with published notices and direct emails providing notification that the City was accepting applications for funding under the CDBG, ESG, and HOME programs through January 31, 2022. The CDBG and ESG NOFA, in combination with a Needs Assessment Hearing, held in November 2019, allowed agencies and interested citizens the opportunity to express their comments, concerns, and thoughts on the housing and community development needs of the community.

Following the application submission period, funding requests were reviewed by staff and members of the Community Development Committee (CDC). Applications were reviewed for compliance with appropriate Federal regulations, Council-adopted local community development objectives, and consistency with the priorities and objectives contained in the 2020-2025 Consolidated Plan. In addition, each application was assessed for demonstration of need; project readiness, capacity, and experience; measurable outcomes, objectives, and low-moderate income benefit; and applicants' experience with managing government grants and leveraging resources. The CDC held two public meetings on March 3, 2022, and March 15, 2022, which resulted in recommendations to the Council on the use of funds.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Mailer via email	mailing list	December, 2021 a mailer advertising the NOFA requesting applications due by January 24, 2022	None received	N/A	
2	Internet Outreach	Non-targeted/broad community	A flyer was posted to the City of Stockton's website and official Facebook page advertising the NOFA requesting applications due by January 24, 2022	None received	n/a	
3	Newspaper Ad	Non-targeted/broad community	A NOFA requesting applications due by January 24, 2022, and notice of March 03, 2022 meeting published in the Record.	None received	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	Attendance included CDC members, community members, stakeholders, and staff. A series of public hearings and outreach was conducted by the City and the CDC when developing the Five-Year Consolidated Plan 2020-2025.	None received	N/A	

**Table 4 – Citizen Participation Outreach**



## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

During the five-year planning period, the City expects to receive approximately \$3.4 million in annual CDBG funding, based on the allocation received in the FY 21/22. This would equal a five-year total of \$17.1 million. The City also anticipates receiving an annual allocation of approximately \$1.6 million in HOME funding for housing activities, and administrative costs, which would equal a five-year total of \$8.0 million. The City also expects to receive an estimated \$293,000 in annual ESG funding, which would equal a five-year total of \$1.5 million. The below table provides a breakdown of these anticipated resources, which are based on FY 21/22 allocations.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,129,459	1,890,162	1,068,240	6,087,861	6,258,918	The expected amount available to City based on 22/23 allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,826,436	977,738	0	2,804,174	3,652,872	The expected amount available to City based on 22/23 allocation.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	284,870	0	0	284,870	569,740	The expected amount available to City based on 22/23 allocation.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The use of HOME and ESG funds often requires matching funds from local and state sources. While investments from State or local governments and the private sector can qualify as matching contributions, Federal funds generally do not qualify. The following is a brief summary of

additional funding sources used to leverage federal funds, satisfy federal match requirements, compliment to other federal resources.

#### Leveraging Funds

Federal funds facilitate the acquisition of other funding sources. In the absence of CDBG and HOME funding, many private financing sources are unavailable to private and non-profit affordable housing developers.

#### Matching Funds

HOME and ESG programs require the use of matching funds. Although the HOME program guidelines require a 25 percent match, for the past twelve years HUD has waived the HOME match requirement for the City of Stockton, as it has for FY 18/19 and FY 19/20. Despite this, the FY 18/19 CAPER identifies an excess HOME match of more than \$95 million.

#### Private Resources

**Affordable Housing Program (AHP)** is a semi-annual competitive grant program offered by financial institutions associated with the twelve local FHL Banks.

**Private Mortgages** provided by private lenders have financed many of the larger multifamily housing projects, as well as some CDBG projects undertaken within the City.

**Private Industry** companies and groups have established funds that can be leveraged to facilitate affordable and workforce housing development.

#### State Resources

California offers numerous funding programs, listed below, which could be used as matching funds for HOME and ESG funds. More information about these programs is available through the California Department of Housing and Community Development:

- Low Income Housing Tax Credit (LIHTC)

- Affordable Housing and Sustainable Communities (AHSC)
- Tax-Exempt Bonds
- CalHome
- Homeless Emergency Aid Program (HEAP)
- Local Housing Trust Fund Program (LHTF)
- Golden State Acquisition Fund (GSAF)
- Housing for Health California (HHC)
- Infill Infrastructure Grant Program (IIG)
- Joe Serna, Jr., Farmworker Housing Grant Program (FWHG)
- Mobile Home Park Rehabilitation and Resident Ownership Program (MPRROP)
- Supportive Housing Multifamily Housing Program (SHMHP)
- Multifamily Housing Program (MHP)
- No Place Like Home
- Predevelopment Loan Program (PDLP)
- Section 811 Project Rental Assistance
- Transit-Oriented Development Housing Program (TOD)
- Veterans Housing and Homeless Prevention Program (VHHP)
- Permanent Local Housing Allocation (PLHA)
- Mixed-Income Program
- California Emergency Solutions Housing (CESH)
- SB 2 Planning Grants Program

#### Federal Resources

McKinney-Vento Homeless Assistance Act established the CoC as the lead agency in the application for S+P and SHP funds.

Housing Choice Voucher Program (HCV) administered by the HACSJ provides low-income households the ability to select affordable privately-owned rental housing through the use of vouchers which close the gap between market-rate rents and the maximum amount deemed affordable, based on the household's size and income level.

National Housing Trust Fund offers deferred payment or forgivable loans to assist in the construction of permanent housing for extremely low-income households. For 2019 HCD is using NHTF dollars to fund the Housing for Healthy California program.

**Opportunity Zones** allow investors to defer capital gains taxes in exchange for investments made in Qualified Opportunity Funds (QOFs). It is currently unclear exactly how much investment can be secured through a partnership with a QOF.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Stockton is actively coordinating with the California Department of General Services (DGS) to develop affordable housing on a State-owned site located at 601 East Miner Avenue in Downtown Stockton near the Cabral Amtrak Station. DGS released an RFP to the development community with the goal of facilitating development of 136 new multifamily dwelling units. Developer respondents are encouraged to try and achieve the greatest degree of affordability possible. According to Executive Order N-06-19, development at the site is required to begin within two years following execution of a development agreement with the preferred developer which was executed in early 2020.

**Discussion**

Not applicable.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing and Services for the Homeless	2020	2025	Affordable Housing Public Housing Homeless	City-wide	Homelessness	CDBG: \$788,694 HOME: \$2,804,174	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 330 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 145 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted Homeless Person Overnight Shelter: 4200 Persons Assisted Homelessness Prevention: 145 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Affordable Housing	2020	2025	Affordable Housing Public Housing Homeless	City-wide	Homelessness Affordable Housing	CDBG: \$788,694 HOME: \$2,804,174	Rental units constructed: 80 Household Housing Unit Rental units rehabilitated: 40 Household Housing Unit Direct Financial Assistance to Homebuyers: 2 Households Assisted
3	Support Economic Development	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	City-wide	Non-Housing Community Development 2	CDBG: \$585,000	Facade treatment/business building rehabilitation: 5 Business Jobs created/retained: 14 Jobs Businesses assisted: 11 Businesses Assisted
4	Public Services	2020	2025	Non-Homeless Special Needs Non-Housing Community Development	City-wide	Non-Housing Community Development 1	CDBG: \$717,000	Public service activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Housing and Services for the Homeless
	<b>Goal Description</b>	Provide housing and services for the City's homeless population, including homelessness prevention. Increase and maintain transitional housing opportunities. Expand housing first model to provide permanent housing units with intense wraparound services on-site.



<b>2</b>	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	Preserve, improve, and expand the supply of decent affordable housing for lower-income households. Increase the supply of affordable multifamily housing. Provide homeownership opportunities for first-time buyers. Assist existing low-income owner-occupied households keep their homes safe and well maintained by providing rehabilitation assistance.
<b>3</b>	<b>Goal Name</b>	Support Economic Development
	<b>Goal Description</b>	Promote economic development activities that create, attract, and retain jobs and promote economic activity and vitality, especially those that provide economic opportunities for low- and moderate-income persons. Prioritize and expand job readiness programs targeting low-income youth, disabled persons, and homeless persons.
<b>4</b>	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Ensure the provision of high-quality public services to support ongoing community development, including the provision of funding for fair housing services, among other activities. Actively and faithfully promote fair housing and investigate housing discrimination. Prioritize the maintenance and improvement of municipal services, facilities, and infrastructure.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The projects and programs that the City funded with CDBG, HOME, and ESG funds during the previous five fiscal years have contributed toward substantial improvements in the lives and neighborhoods of Stockton's low-income residents and provided safe, decent housing for many who would not otherwise be able to afford it. The programs and activities funded in the FY 2022-23 Action Plan will build on these prior successes and continue to meet the objectives of the 2020-2025 Consolidated Plan.

#### Projects

#	Project Name
1	CDBG Administration
2	CDBG Housing Program Delivery
3	CDBG Housing Programs
4	Debt Service - Section 108 Loan Repayment
5	Emergency Repair Program
6	Commercial Facade Improvement Program
7	Micro-Storefront Beautification Grant
8	Stockton Entrepreneurship Program
9	Fresh Produce Access Grant
10	Food Entrepreneurship and Urban Garden Support
11	San Joaquin Fair Housing
12	Gospel Center Rescue Mission
13	Visionary Home Builders of California
14	Parents by Choice
15	Bread of Life
16	Second Harvest Food Bank
17	Children's Home of Stockton
19	Uplift All Foundation
20	San Joaquin County Aging and Community Services
21	Downtown Stockton Alliance
22	Boys & Girls Club at Sierra Vista - Stockton
23	Kelly's Angels
24	Tuleburg Press
25	Child Abuse Prevention Council
26	HOME Administration

#	Project Name
27	HOME Program Delivery
28	HOME Housing Loans
29	CHDO Set-Aside Funds
30	ESG22 Stockton

**Table 7 - Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

The City has identified the lack of sufficient funding as the greatest obstacle to meeting the underserved needs. For 2022-2023, the City received a total of \$259,408 less in CDBG, \$7,509 less in ESG funds, and \$65,907 more in HOME funds. During the next year the City will continue to apply for funding and/or support applications by other organizations to expand affordable housing opportunities, homeless assistance and supportive services, and to meet the other needs of the low-income residents and neighborhoods.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing and Services for the Homeless Affordable Housing Support Economic Development Public Services
	<b>Needs Addressed</b>	Homelessness Affordable Housing Non-Housing Community Development 1 Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$905,451
	<b>Description</b>	Staff and service delivery costs are associated with the implementation of various housing rehabilitation programs. Matrix Code: 14H, National Objective: LMH Citation: 570.202 Performance Measure: DH-2
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A-Administration
	<b>Location Description</b>	N/A-Administration
	<b>Planned Activities</b>	General Program Description Admin, no goals associated with Admin.
<b>2</b>	<b>Project Name</b>	CDBG Housing Program Delivery
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$350,000
	<b>Description</b>	Staff and service delivery costs are associated with the implementation of various housing rehabilitation programs. Matrix Code: 14H, National Objective: LMH Citation: 570.202 Performance Measure: DH-2
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Ten (10) low income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Rehabilitation Administration and Down Payment Assistance
<b>3</b>	<b>Project Name</b>	CDBG Housing Programs
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing and Services for the Homeless Affordable Housing
	<b>Needs Addressed</b>	Homelessness Affordable Housing
	<b>Funding</b>	CDBG: \$927,233
	<b>Description</b>	CDBG funds will be provided through various City housing programs for the improvement of low- and moderate-income housing city-wide. The Single-family Housing Repair Program assists in the rehabilitation of owner-occupied residences. The Multi-family Housing Program assists in the rehabilitation or the development of low- and moderate-income multi-family housing. Matrix Code: 14A/14B National Objective: LMH Citation: 570.202 Performance Measure: DH-2
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income families
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Rehabilitation, Multi-unit residential
<b>4</b>	<b>Project Name</b>	Debt Service - Section 108 Loan Repayment
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Support Economic Development
	<b>Needs Addressed</b>	Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$2,543,183

	<b>Description</b>	The City of Stockton received a Section 108 loan that was used for the Hotel Stockton, the Downtown Cineplex, Weber Block Plaza (Dean DeCarli Square), and the Mercy housing affordable housing development. These funds represent the City's repayment of the loan funds and interest. Matrix code: 19F
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Debt Service
	<b>Location Description</b>	Debt Service
	<b>Planned Activities</b>	Debt Service
5	<b>Project Name</b>	Emergency Repair Program
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$60,000
	<b>Description</b>	Funds are provided for the repair of immediate health and safety conditions that present a danger to the occupants of the home. The Emergency Repair Program was designed to provide one-time emergency repair assistance to low-income property owners. Properties with an owner over the age of 65 or with special needs may be eligible for a grant. Repairs are limited to corrections of code enforcement violations listed in official documents issued by the City, the Fire Marshall or the Health Officer stating the code violations present causing imminent danger to life, limb, property, or safety of the public or occupants. Matrix Code: 14A National Objective: LMH Citation: 570.202 Performance Measure DH-1
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately four low-income owner-occupied households may be eligible for rehab funding.
	<b>Location Description</b>	City Wide

	<b>Planned Activities</b>	The Safe Step for Youth Program will provide at-risk or homeless transition-age youth with housing assistance through long-term rental assistance paired with wraparound services geared toward promoting housing stability.
6	<b>Project Name</b>	Commercial Facade Improvement Program
	<b>Target Area</b>	City-wide Former Redevelopment Project Areas
	<b>Goals Supported</b>	Support Economic Development
	<b>Needs Addressed</b>	Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$175,000
	<b>Description</b>	Facade improvements to local small businesses.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Three businesses will receive facade improvements. Qualifying businesses are located in the target area.
	<b>Location Description</b>	Eligible areas include the Waterfront Redevelopment Project Area, El Dorado Street between Harding Way and Park Street, California Street between Harding Way and Park Street, East Main Street between Wilson Way and Highway 99, Fremont Street between Ryde Avenue and Interstate 56, Charter Way between Interstate 5 and Airport Way, and Airport Way between Charter Way and Twelfth Street.
	<b>Planned Activities</b>	Rehabilitation; Commercial Facade
7	<b>Project Name</b>	Micro-Storefront Beautification Grant
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Support Economic Development
	<b>Needs Addressed</b>	Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	Assist commercial property and/or business by providing funding for minor storefront improvements. Matrix Code: 14E Citation: 570.202 Performance Measure: EO-3 National Objective: SBA Presumed benefit: No
	<b>Target Date</b>	6/30/2023



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Six business owners will receive minor storefront improvements.
	<b>Location Description</b>	Eligible areas include targeted commercial corridors: Charter Way, MLK Jr. Boulevard, E. Main Street, Airport Way, Wilson Way, E Fremont Street, West Lane, E Ben Holt (east of Pacific Ave), Hammer Lane, Lower Sacramento Rd (near Ponce de Leon), Pacific Ave (between Harding and Alpine Ave), Harding Way, Yosemite Street, El Dorado St (up to Essex Street), California Street (up to Alpine Ave) and the Downtown Improvement District.
	<b>Planned Activities</b>	Assist commercial property and/or business by providing funding for minor storefront improvements.
<b>8</b>	<b>Project Name</b>	Stockton Entrepreneurship Program
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Support Economic Development
	<b>Needs Addressed</b>	Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Previously named the Entrepreneurship/Business Incubator program. Funding for organizations that serve as business service providers to facilitate and provide services to entrepreneurs. Direct Financial Assistance to for-profits and to assist entrepreneurs in starting or expanding their business concept. matrix Code 18C Citation 570.201(o) Performance Measure E National Objective. LMAA Presumed Benefit
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Seven microenterprise businesses for low-moderate-income persons.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	ED Direct Financial Assistance to for profits and to assist entrepreneurs start or expand their business concept.
<b>9</b>	<b>Project Name</b>	Fresh Produce Access Grant
	<b>Target Area</b>	City-wide

	<b>Goals Supported</b>	Support Economic Development
	<b>Needs Addressed</b>	Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	The program will reduce food insecurity by offering retail stores grant funding to assist with needed infrastructure to promote the sale and storage of healthier and/or fresh food options. Matrix ode 18A Citation 570.203 (a) Performance Measure E National Objective LMAA.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Three businesses will be assisted.
	<b>Location Description</b>	city-wide
	<b>Planned Activities</b>	These grants can be used to make improvements in retail stores such as the installation of new refrigeration or shelving, to provide more access to healthier and/or fresh food options in the US Department of Agriculture defined Food Deserts within the City of Stockton.
10	<b>Project Name</b>	Food Entrepreneurship and Urban Garden Support
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Support Economic Development
	<b>Needs Addressed</b>	Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$150,000
	<b>Description</b>	Previously the Stockton Community Kitchen Incubator. Provided funding to support small local food and beverage entrepreneurs in Stockton. Matrix Code 18C Citation 570.203 9b) Performance Measure E National Objective LMAA Presumed Benefit
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Three businesses.
	<b>Location Description</b>	

	<b>Planned Activities</b>	ED Direct Financial Assistance to support small local food and beverage entrepreneurs in Stockton.
<b>11</b>	<b>Project Name</b>	San Joaquin Fair Housing
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homelessness Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$87,071
	<b>Description</b>	This activity supports the local fair housing office which provides services in the form of landlord/tenant education and mediation. Matrix Code: 05J Citation:570.201(e) Performance Measure: DH-1 National Objective Code: LMC Presumed Benefit
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 homeless individuals
	<b>Location Description</b>	city-wide
	<b>Planned Activities</b>	public services, homeless assistance
<b>12</b>	<b>Project Name</b>	Gospel Center Rescue Mission
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing and Services for the Homeless Affordable Housing
	<b>Needs Addressed</b>	Homelessness Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$72,071
	<b>Description</b>	Rehab of sleeping quarters and bathroom, and expansion of laundry area serving homeless individuals. Making existing facilities ADA compliant, A/C units, and expanding of community closet. Matrix Code: 03C Citation: 570.201(C) Performance Measure: SL-1 National Objective: LMC Presumed Benefit: Yes
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	705 homeless individuals staying at the emergency shelter.
	<b>Location Description</b>	city-wide
	<b>Planned Activities</b>	public services, senior services
<b>13</b>	<b>Project Name</b>	Visionary Home Builders of California
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Affordable Housing Public Services
	<b>Needs Addressed</b>	Affordable Housing Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$47,071
	<b>Description</b>	Operating expenses to retain HUD certified housing counselor, intake specialist, and admin staff in order to serve the community through education and counselling services and program enrollment services. 05J, LMH
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20 individuals from low-income households.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Public services.
<b>14</b>	<b>Project Name</b>	Parents by Choice
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homelessness Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$112,071

	<b>Description</b>	The Safe Step for Youth Program will provide at-risk or homeless transition-age youth with housing assistance through long-term rental assistance paired with wraparound services geared toward promoting housing stability. Matrix Code 05D Objective Code URG
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20 at-risk 18-24 year old youth that are at-risk of homelessness or homeless.
	<b>Location Description</b>	
	<b>Planned Activities</b>	The Safe Step for Youth Program will provide at-risk or homeless transition-age youth with housing assistance through long-term rental assistance paired with wraparound services geared toward promoting housing stability.
<b>15</b>	<b>Project Name</b>	Bread of Life
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homelessness Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$42,071
	<b>Description</b>	Funds to be used to help maintain a food pantry; rent for warehouse space, wages, and usual day-to-day operations including utilities, insurance, IT, and supplies. Matrix Code 05W National Objective URG
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimated impact for 55,000 City of Stockton residents ranging from moderate to extremely low-income.
	<b>Location Description</b>	3034 Michigan Ave., Stockton CA 95204
	<b>Planned Activities</b>	Funds to be used to help maintain a food pantry; rent for warehouse space, wages, and usual day-to-day operations including utilities, insurance, IT, and supplies.
<b>16</b>	<b>Project Name</b>	Second Harvest Food Bank

	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homelessness Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$37,071
	<b>Description</b>	Funds are to help with the continuation of the collaboration of 25 non-profits within the City of Stockton that are supporting a food pantry program. Matrix Code 05W National Objective URG
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20,000 low-income families or individuals in need of food.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Public Services/food assistance.
17	<b>Project Name</b>	Children's Home of Stockton
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing and Services for the Homeless
	<b>Needs Addressed</b>	Homelessness Affordable Housing
	<b>Funding</b>	CDBG: \$87,071
	<b>Description</b>	The program would continue to sustain operations and services for its Catalyst Program through which they will provide shelter and supportive services for transition-age youth. 05D, LMC
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	18 transition-age youth; 18-24 transition-age youth.
	<b>Location Description</b>	city-wide

	<b>Planned Activities</b>	Helping youth achieve self-sufficiency and permanent housing. The program would continue to sustain operations and services for its Catalyst Program through which they will provide shelter and supportive services for transition-age youth.
<b>18</b>	<b>Project Name</b>	Uplift All Foundation
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homelessness Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$52,071
	<b>Description</b>	Funding to be used to fund staff payroll for the operations of the mobile laundry service, some staff will be chosen from within the homeless population. The remaining funding will be used to aid in the funding supplies for the mobile laundry vans, Loads of Hope. 03P, LMC
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 homeless individuals
	<b>Location Description</b>	city-wide
	<b>Planned Activities</b>	Public Services; homeless assistance.
<b>19</b>	<b>Project Name</b>	San Joaquin County Aging and Community Services
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$12,071
	<b>Description</b>	Program funding to be used to purchase and deliver meals to Stockton homebound elderly and frail residents, Meals on Wheels. 05A, LMC
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	20 seniors in need of food assistance.
	<b>Location Description</b>	city-wide
	<b>Planned Activities</b>	Public Services; senior services.
<b>20</b>	<b>Project Name</b>	Downtown Stockton Alliance
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homelessness Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$37,071
	<b>Description</b>	Funds are to support the Portable Bathroom and Shower Program which is offered within the City of Stockton 5 days a week to the homeless population. 03P,LMC
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	400 homeless individuals
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Public services operations of mobile shower for homeless persons
<b>21</b>	<b>Project Name</b>	Boys & Girls Club at Sierra Vista - Stockton
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$17,071
	<b>Description</b>	Provide for the purchase and supply of Club Connect Kits which provide members with weekend food and snack boxes. Kits also provide supplies for school and some PPE items for the entire family. 03D. LMASA
	<b>Target Date</b>	6/30/2023



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	175 youth and families that are low-income.
	<b>Location Description</b>	Sierra Vista Homes
	<b>Planned Activities</b>	Provide youth with kits for food, PPE and activities.
<b>22</b>	<b>Project Name</b>	Kelly's Angels
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Non-Housing Community Development 1
	<b>Funding</b>	CDBG: \$12,071
	<b>Description</b>	Funds to aid in the continuation of providing services to youth who are experiencing trauma. Funds are for mental and behavioral health programs to assist with recovery.05D, LMC
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	49 at-risk youth
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding for recovery through behavioral health programs, therapy services, tutoring and mentoring services, scholarships, sports, arts, and music programs.
<b>23</b>	<b>Project Name</b>	Tuleburg Press
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$32,071
	<b>Description</b>	Funds to cover the expenses for The Write Place as well as to offer workshops in creative writing, papermaking, letterpress printing, and bookbinding. 05Z, LMA

	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	50 low-income youth
	<b>Location Description</b>	
	<b>Planned Activities</b>	Refurbishing an elementary school library; monthly art/writing classes and workshops.
<b>24</b>	<b>Project Name</b>	Child Abuse Prevention Council
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Non-Housing Community Development 2
	<b>Funding</b>	CDBG: \$70,071
	<b>Description</b>	Funding is aimed at increasing the number of Court Appointed Special Advocates volunteers (CASA) to support the number of Stockton children in foster care. Funding will also be used to create another job that will be geared toward recruiting and training that will occur as the need for CASA volunteers increases.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	75 at-risk youth in foster care
	<b>Location Description</b>	127 N Sutter St., Stockton, CA 95202
	<b>Planned Activities</b>	Increase number of CASA volunteers trained to work with foster youth.
<b>25</b>	<b>Project Name</b>	HOME Administration
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing and Services for the Homeless Affordable Housing
	<b>Needs Addressed</b>	Homelessness Affordable Housing Non-Housing Community Development 2

	<b>Funding</b>	HOME: \$270,000
	<b>Description</b>	Administration of HOME Program including oversight, management, and capacity building.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a Administration
	<b>Location Description</b>	citywide
	<b>Planned Activities</b>	
	<b>Planned Activities</b>	
26	<b>Project Name</b>	HOME Program Delivery
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$150,000
	<b>Description</b>	Delivery costs are associated with the implementation of specific housing programs and projects. This includes staff time spent reviewing agreements, staff reports, and general technical assistance provided to HOME-assisted projects.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
	<b>Location Description</b>	citywide
	<b>Planned Activities</b>	Delivery costs associated with the implementation of specific housing programs and projects. This includes staff time spent reviewing agreements, staff reports, and general technical assistance provided to HOME-assisted projects.
27	<b>Project Name</b>	HOME Housing Loans
	<b>Target Area</b>	City-wide

	<b>Goals Supported</b>	Housing and Services for the Homeless Affordable Housing
	<b>Needs Addressed</b>	Homelessness Affordable Housing
	<b>Funding</b>	HOME: \$2,110,209
	<b>Description</b>	HOME funds will be used to provide financial assistance for the rehabilitation or development of low-income housing on a city-wide basis. The Housing Rehabilitation Program will be available to assist single-family homeowners to make repairs to their residences. The Down Payment Assistance Program will assist qualified low-to-moderate income households with down-payment assistance and/or soft 2nd mortgages. Funds will also be available for multi-family rehabilitation or construction projects.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Subject to proposals received in the annual NOFA.
	<b>Planned Activities</b>	Financial assistance for the rehabilitation or development of low-income housing.
28	<b>Project Name</b>	CHDO Set-Aside Funds
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing and Services for the Homeless Affordable Housing
	<b>Needs Addressed</b>	Homelessness Affordable Housing
	<b>Funding</b>	HOME: \$273,965
	<b>Description</b>	Set-Aside funds are required by HUD HOME regulations for housing activities owned, developed, and/or sponsored by qualified Community Housing Development Organizations (CHDO).
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Subject to proposals received in the annual NOFA.
	<b>Location Description</b>	citywide
	<b>Planned Activities</b>	Financial assistance for the rehabilitation or development of low-income housing.
29	<b>Project Name</b>	ESG22 Stockton
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Housing and Services for the Homeless Public Services
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	ESG: \$284,870
	<b>Description</b>	Non-staff operation costs for organizations that provide services to the homeless, funds provided to Central Valley Low Income Housing Corporation (CVLIHC) for the provision of Rent Assistance and Stabilization Services to households that are experiencing homelessness, and conduct data collection via the Homeless Management Information System; and Administration of the ESG program including staff and operation costs of oversight and management. Citations: 576.102, 576.103, 576.104, 576.108 Performance Measure SL-1 Presumed benefit
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5000 homeless people will receive shelter or services, or receive rent assistance and stabilization services.
	<b>Location Description</b>	<ul style="list-style-type: none"> <li>• Central Valley Low Income Housing Corporation (CVLIHC)-2431 West March Ln #350, Stockton, CA 95207-Services offered city-wide</li> <li>• Ready to Work-119 E. Weber Avenue Stockton, 95202</li> <li>• Gospel Center Rescue Mission-445 S San Joaquin Street, Stockton, CA 95203</li> <li>• St. Mary's Dining Room-545 West Sonora Street Stockton, CA 95203</li> </ul>

	<b>Planned Activities</b>	<p>ESG22 Shelter- Stockton Shelter for the Homeless \$71,249 ESG-22 St. Mary's Dining Hall \$61,249 for a total of \$132,498</p> <p>ESG-22 Homeless Prevention Rapid Rehousing CVLIHC \$101,249 and Ready to Work \$18,749 for a combine total of \$119,998</p> <p>ESG-22 Data Collection \$13,249</p> <p>ESG -22 Admin \$19,125</p>
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## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The City does not allocate funds to specific geographic target areas; rather, the City makes resources available on a city-wide basis, but provides additional outreach and recruitment in areas with high concentrations of unmet needs. Organizations that are awarded program and/or project funding may have their headquarter offices located in other cities within San Joaquin County; however, all Stockton funded activities are required to serve only City of Stockton eligible households.

#### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City-wide	100
Former Redevelopment Project Areas	0

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City of Stockton allocates resources on a citywide basis. For example, the housing rehabilitation programs, and down payment assistance programs are equally available to qualifying residents in all geographic subareas, with eligibility being determined based on the income of the household receiving assistance. Households with the greatest demonstrated unmet need generally receive higher priority for assistance. Additional preference is given to households residing in areas with disproportionately high concentrations of low and moderate income households, minority households, and/or households experiencing HUD defined housing problems, such as those areas identified under subsection MA 50 of the Consolidated Plan. Projects located in areas that correspond with other related or complementary programs and/or projects also receive additional preference or priority consideration. For example, funding for the rehabilitation of existing rental housing, that would be affordable to low and moderate income households and located in areas targeted for crime abatement activities under the Stockton Marshall Plan would receive higher priority than projects located in other areas.

#### **Discussion**

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The 2020-2025 Consolidated Plan establishes housing strategies for renter, owner, and homeless populations and Five-Year goals for each of these strategies. The City operates its various housing programs based on these strategies, which have been prioritized to guide the allocation of resources. Consistent with the priorities outlined in the Consolidated Plan, the City will undertake or fund the following activities to address housing needs:

- Multi-Family Loan Pool
- CHDO Set-Aside
- Housing Rehabilitation Program
- Down Payment Assistance Program
- Emergency Repair Program
- San Joaquin Fair Housing

One Year Goals for the Number of Households to be Supported	
Homeless	13
Non-Homeless	11
Special-Needs	0
Total	24

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	13
Rehab of Existing Units	11
Acquisition of Existing Units	0
Total	24

Table 10 - One Year Goals for Affordable Housing by Support Type



## Discussion

Thirteen units that will be constructed utilizing a combination of CDBG and HOME funds to provide permanent housing for the homeless. In 2022-2023 the City plans to continue using HOME funds and some CDBG funding to support affordable housing, Single Family Rehab and Emergency Repair, and ensure that Fair Housing mediation service are available.

The City will fund these activities with entitlement, program income, or revolving loan funds.

The City is addressing the lack of affordable housing by supporting and funding the development of new construction and/or the rehabilitation of affordable rental housing developments targeting households with incomes at or below 50 percent of the area median income (AMI). The City provides funding to expand the development of affordable housing through its three federal entitlement grant program funds the HOME Investment Partnership, Community Development Block Grant and Emergency Solutions Grant funds for programs that promote and maintain affordable housing. Additionally, the City funds San Joaquin Fair Housing, which provides Fair Housing Counseling and Landlord Tenant Mediation Services; and, CIVLIC for implementation of its Tenant-Based Rental Assistance (TBRA) programs for homeless persons, and tenant eviction prevention assistance for Stockton's lower income residents.

The City of Stockton is working collaboratively with San Joaquin County and San Joaquin Continuum of Care (CoC) to develop a Regional Strategic Plan on Homelessness, the City of Stockton's Council has identified the development of affordable housing as one of its top priorities and has implemented various General Plan amendments to facilitate the production of a variety of housing types in non-residential and mixed-use zones. The General Plan specifically focused on policies to facilitate development up to 18,400 new housing units within the City's existing limits.

The City of Stockton currently has six affordable housing projects in its development pipeline that will result in over 500 units of affordable housing within the next five years with approximately 25 percent or 125 of the units are targeting homeless individuals, extremely low-income households (ELI incomes at or below 30% AMI).

The City not only promotes the development of rental housing, but also affordable homeownership for low and moderate-income households through the City's down payment assistance first time homebuyer program. The City leverages its federal entitlement Funds (HOME and CDBG funds) with other private and public sources. Layering sources of funds provide affordability to serve low-income homebuyers at or below 80% AMI.

In addition, the City's Loan and Grant Rehabilitation Program will provide low-interest, deferred payment loans to existing low-income homeowners, whose homes need repairs and or improvements

The City is further addressing its housing affordability crisis by collaborating with agencies such as the

San Joaquin Housing Authority (SJHA) to establish incentive programs that pool local and federal resources to provide (Section 8) Housing Choice Voucher (HCV) participants' greater opportunities of success in securing housing in Stockton. Stockton landlords' have become resistant to renting to Housing Choice Voucher participant households.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Stockton and the Housing Authority of San Joaquin County (Housing Authority) maintain a strong partnership built on the common goal and priority of providing affordable housing opportunities for Stockton's low-income residents. Within the last five years, the Housing Authority has applied for affordable housing funding through the City of Stockton's NOFA process and has been awarded upwards of \$4.5 million to assist in the financing of three of its affordable housing projects. A Housing Authority city-funded project includes phases II and III of their 394-unit Sierra Vista housing complex targeting extremely low-income households at 30% AMI. As well as the demolition and rehabilitation of its Conway Homes project a 9-unit development.

### **Actions planned during the next year to address the needs to public housing**

The City plans to issue a NOFA in the upcoming year that the Housing Authority will be eligible to apply for funding. Additionally, the Housing Authority recently applied for funding for two of its pipeline affordable housing developments Sonora Square Apartments and Conway Homes projects that are progressing through the funding process. Once completed, the Housing Authority will be able to offer upward of sixty-four (64) more units to low-income families.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The City continues to maintain a partnership with the local Housing Authority to assist public housing residents to achieve homeownership.

Under the Housing Authority's homeownership program, assistance is available to Housing Choice Voucher (HCV) participants who meet the homeownership eligibility requirements. The homeownership program allows first-time homebuyers to use the voucher subsidy to meet monthly homeownership expenses. HCV participants interested in applying for the HCV Homeownership program must meet the following program criteria:

- Must be a participant in the HCV program for at least one year in San Joaquin County.
- Must be a first-time homebuyer.
- Meet the minimum employment and income requirements.
- Must be employed for at least 30 hours per week (except for disabled).
- Must earn at least \$11,310 annually (welfare income not included).
- Must not have defaulted on a mortgage under the HCV Homeownership Program.

The homeownership program has a maximum term of 15 years. There are exceptions for disabled families. This program is limited.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Housing Authority of San Joaquin County is not designated as “troubled” by HUD.

**Discussion**

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The City will utilize Emergency Solutions Grant funds to assist in funding the operation of emergency homeless shelters, funding the building and expansion of low-barrier shelters, implementing Homeless Prevention, and Rapid Re-Housing activities which will assist in reducing and preventing homelessness. The City of Stockton works with the San Joaquin Continuum of Care (CoC) to implement policies, and procedures and establish performance standards for those agencies providing services to address the needs of the homeless persons and as identified in the Continuum’s planning guidelines. The CoC is a consortium of local government agencies, non-profit organizations, and other interested parties, encompassing all jurisdictions in San Joaquin County, including the City of Stockton. They hold meetings that are open to all homeless providers, and that serves as a venue for ongoing program planning and coordination and feedback for addressing homelessness across all ages. The CoC has identified the following homeless performance measures goals:

1. Reduction in the average and median length of time persons remain homeless.
2. Reduction in the percentage of persons who return to homelessness from permanent housing.
3. Reduction in the total number of persons who are homeless.
4. Increase in the percent of adults who gain or increase employment or non-employment cash income over time.
5. Reduction in the number of persons who become homeless for the first time.
6. Increase in the percent of persons who exit to or retain permanent housing from PSH.
7. Reduce the number of people living unsheltered in our community.
8. Increase the number of units available to those exiting homelessness.

Additionally, CVLIHC ,which serves as the Homeless Management Information System (HMIS) lead, and the Family Resources and Referral Center, which serves as the organization responsible for implementing the Coordinated Entry System and assisting in the development of its policies and procedures as well as establishing coordinated partnerships between all organizations, agencies and local shelters and service providers as part of the CES Committee that reports to the Continuum of Care (CoC). CVLIHC will continue to conduct outreach to the shelters to notify them of the activities and the process for making referrals to the various programs.

In keeping with the goals of the CoC, Central Valley Low Income Housing Corporation (CVLIHC), recently completed Phase 1 of their Town Center Studios project. The goal of this project is to convert a hotel into studio apartments for use by the unhoused chronically homeless and at-risk of homelessness population. Through the completion of Phase I, CVLIHC has been able to offer housing to 27 individuals across 20 units. Currently, they will be embarking upon Phase II where they will provide another 20 available units.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The CoC recently conducted the 2022 Point in Time Count (PIT) which, utilized methods of outreach that were considerably improved over prior years. Thus, the PIT identified a slightly larger population of unsheltered homeless, compared to prior years. Based on this significantly improved response rate, the CoC can prepare more detailed and comprehensive estimates of needs, including an analysis of needs by type (e.g., housing, social services, etc.), as well as needs based on the characteristics of the respondent (e.g., age, race/ethnicity, veterans' status, disability status, etc.). These data can subsequently be used to better assess the needs of the unsheltered homeless and can be used to direct any indicated changes in service provision. This is particularly valuable since unsheltered homeless are frequently among the hardest to reach regarding available services.

The following represents a list of actions to be taken during the five-year planning period designed to improve outreach to homeless persons, especially unsheltered persons, as well as those who are at risk of homelessness. Note that these actions are not only designed to promote outreach that both identifies and quantifies needs, but also offer opportunities to inform the homeless regarding available resources for service populations. Additional outreach is undertaken with homeless persons and families residing in emergency shelters and transitional housing. However, because these persons are entering a facility, it is much easier to access these individuals using existing tools, such as entrance and

exit surveys, and one-on-one education.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Short-term strategies include, but should not be limited to, the following:

- Continue to provide material, financial, and technical assistance to maintain, preserve, and expand existing shelter programs;
- Provide assistance for near-term rehabilitation and improvement of existing shelter facilities;
- Continue to provide support to emergency and transitional housing providers for the coordination and provision of complementary supportive services;
- Maintain and improve coordination between emergency, transitional, and permanent supportive housing to ensure a smooth and supported transition for persons and families striving to exist homelessness;
- Maintain the existing inventory of housing for homeless persons and, where necessary, provide resources to ensure consistent or improved capacity;
- Improve coordination with local healthcare providers, law enforcement agencies, etc. to refine and improve discharge policies to ensure that persons are not discharged into homelessness.

Long-term strategies include, but should not be limited to, the following:

- Support the acquisition, rehabilitation, or construction of emergency shelter facilities, providing priority to projects that substantively expand or improve the inventory;
- Support the acquisition, rehabilitation, or construction of transitional and permanent supportive housing, providing priority to projects that substantively expand or improve the inventory;
- Implement a mechanism to promote the availability of permanent, and permanent supportive, housing for homeless persons and persons at-risk of homelessness, including, but not limited to, providing assistance for rental deposits, utility deposits, and referral services.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The ESG and CoC interim regulations encourage providing homeless persons and households with housing as quickly as is practicable, and only availing supportive services that are of greatest need to support stable housing, while other needs are addressed through existing mainstream resources available within the community. This recognizes that while there are multiple models for housing and supportive service provision for the homeless, the housing first model, as well as rapid rehousing and

preventative services, have emerged as important implementation strategies, among other industry best practices. Below are actions intended to facilitate the rapid transition of homeless persons from an unsheltered or sheltered condition, toward permanent and independent living.

- Maintain and expand support to existing programs with proven track records of encouraging the transition from emergency or transitional shelters to permanent and supportive housing;
- Provide resources for expanded case management services, including lengthening the amount of time that persons may receive case management, as a method for improving eligibility for rental housing and applicable supportive services;
- Coordinate rapid re-housing needs assessment with coordinated intake strategy and case management strategy;
- Encourage the establishment of new permanent, and permanent supportive, housing for homeless individuals and households with children.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The availability of HPRP funds greatly expanded the availability of resources for homelessness prevention. While the City continues the programs established under HPRP, the lack of resources severely limits the efficacy of the program and the number of households assisted. The following include several actions intended to preserve and expand the existing programs and ensure the future availability of homeless prevention services and assistance.

- Identify and secure alternative funding sources for programs previously funded through HPRP;
- Coordinate with existing housing and assistance programs to provide priority, and a streamlined or expedited applications process, for persons at imminent risk of becoming homeless;
- Provide coordinated diversion and referral services to persons at-risk of homelessness;
- Coordinate diversion services with rapid rehousing efforts to shorten the length of stay.

## **Discussion**

cont. from introduction...

The following goals and objectives, developed in cooperation with the San Joaquin County Continuum of Care, will be implemented through the Homelessness Prevention and Re-housing activities funded with ESG:



- Intervention on behalf of households who are in imminent risk of becoming homeless to prevent people from initially becoming homeless;
- Diversion from emergency shelters of working households who have reached the point of contacting shelters; and
- Rapid re-housing of working households who have become homeless.

The homeless prevention activity targets the following populations who can reasonably be expected of becoming self-sufficient within three months or less:

- Households forced to vacate rental properties that enter foreclosure;
- Households at imminent risk of becoming homeless due to sudden and substantial loss in income out of the control of members of the household;
- Households at imminent risk of becoming homeless due to a sudden and substantial increase in utility costs which is not due to the activity of one or more members of the household;
- Households forced to vacate rental housing condemned by local housing officials, when condemnation is not a result of the activity of one or more household members;
- Households at imminent risk of becoming homeless due to a traumatic life event, such as death of a spouse or primary care giver or recent health crisis that prevented the household from meeting its normal financial responsibilities;
- Households with at least one adult employed, at imminent risk of becoming homeless due to factors not related to activity of one or more household members; or
- Households currently living in an emergency shelter, in locations not meant for human habitation, or fleeing domestic violence.

The City plans to undertake activities to address the housing and supportive service needs for persons who are not homeless, but have other special needs. Funds have also been allocated to the San Joaquin County Human Services Agency for the distribution of meals to home-bound seniors known as "Meals on Wheels."

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

It is often in the public interest for local governments to impose regulations concerning the scope and characteristics of development as a method for protecting public health and general welfare. However, government regulations, policies, and procedures can also act to constrain the development of otherwise desirable land uses. Regulations designating the type and location of housing, for example, can potentially constrain the ability of housing developers to provide higher-density housing that would be more affordable to lower income households. Similarly, building codes and other requirements can significantly increase the cost to develop housing, or make the development process so arduous as to discourage potential housing developers. California housing law requires that each jurisdiction include an analysis of governmental constraints to affordable housing development as a required component of the adopted General Plan Housing Element. The remainder of this section presents a summary of the major findings identified under the Potential Housing Constraints Section of the City of Stockton Housing Element. To the degree practicable, the analysis also includes a discussion of the actions to be taken to overcome these constraints, as identified in the Housing Element.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The Housing Element of the City of Stockton General Plan, adopted in April 2016, provides a thorough analysis of the existing policy barriers to affordable housing development. An analysis of the permitted densities and development standards identified that the adopted Code facilitates the production of a variety of housing types, with residential development permitted in non-residential and mixed-use zones, with permitted densities up to 87 units per acre Downtown. The Housing Element states that the City applies flexible development standards for infill housing projects to encourage the development of underutilized properties, however, development standards may be modified to create consistency with surrounding development and physical site constraints. The Housing Element determined that the City's overall parking standards did not constitute a constraint, nor does processing and permitting. Since the last Housing Element, the City's Affordable Housing Density Bonus has been made consistent with State law. It allows for a density bonus of up to 35 percent and allows developers that are eligible for a density bonus to receive up to three additional incentives.

The City adopted a Development Code amendment in 2016 to be consistent with State law to allow emergency shelters by right, without discretionary review, in the PF, IL, and IG zone. Per the San Joaquin Partnership's Regional Development Fee Comparative Analysis Report (June 2013), the City of Stockton's fees for a single family dwelling was the second-highest of all the San Joaquin County jurisdictions but were about average for all 21 jurisdictions included in the analysis. To promote

affordable housing, the City established a fee reduction program for developers of affordable housing units. Developers of multi-family housing developments can receive a fee reduction of \$14,997 per unit and a fee reduction of \$19,997 for single-family residential development.

Based on an analysis of the permitted densities and development standards, the City has found that the General Plan and Development Code facilitates the production of a variety of housing types. The City allows residential development in non- residential and mixed- use zones and permits densities as high as 87 units per acre in the downtown area. Additionally, the City has flexible development standards to encourage the development of small infill parcels.

Recent state legislation provides clarification and fee assistance for the creation of Accessory Dwelling Units (ADUs) with two separate bills signed on October 8, 2017: SB 229 (Wieckowski) and AB

494 (Bloom). These bills, effective January 1, 2018, clarify and improve various provisions of the law to promote the development of ADUs, including allowing ADUs to be built concurrently with a single-family home, opening areas where ADUs can be built to include all zoning districts that allow single-family uses, modifying fees from utilities, such as special districts and water corporations, and reducing parking requirements. In 2018, City Council accepted the Planning Commission's recommendation and adopted an Ordinance to amend Title 16 of the Stockton Municipal Code, Section 16.80.310, "Secondary Dwelling Units;" and Section 16.240.020, "Definitions of Specialized Terms and Phrases;" to comply with state planning and zoning law (Government Code Section 65852.2).

**Discussion:**

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

#### **Actions planned to address obstacles to meeting underserved needs**

The City will work in partnership with its non-profit and public service agencies to address the needs of the underserved populations in the City of Stockton. The City will fund several agencies that provide food, assistance, shelter and/or services for the homeless, elderly, and working poor.

#### **Actions planned to foster and maintain affordable housing**

The City will leverage funds we receive with other resources and use our programs in conjunction with other city initiatives, including our single-family rehabilitation program. The City will continue to use its Notice of Funding Availability NOFA process to solicit eligible affordable housing projects to fund.

#### **Actions planned to reduce lead-based paint hazards**

## **Actions planned to reduce the number of poverty-level families**

The City's Consolidated Plan includes an Antipoverty Strategy. The activities in the City's Antipoverty Strategy can be classified under two categories: Economic Development and Supportive Service Programs. The Consolidated Plan recognizes that in order for households to transition from unemployment or low-income positions to median income positions, there needs to be vocational training, resource management, and life skill training. The Plan also recognizes that while households are obtaining the training, the families will continue to need assistance in meeting their basic needs.

In these difficult economic conditions, the City's Community Development Committee determined that allocating scarce resources to those agencies that will provide some of the most basic services, such as food, to the most number of people was the best way to assist households.

Consistent with the City's Antipoverty Strategy, the City proposes to fund the following programs:

- Four programs that will provide food and nutritional education to homeless and low-income individuals;
- Fund non-staff operational costs for four emergency shelters. In addition to providing shelter, these organizations also provide services that assist individuals in achieving self-sufficiency; and
- Fund homelessness prevention and re-housing activities which will help keep households in their homes or provide assistance to re-housing households that have become homeless.

## **Actions planned to develop institutional structure**

The City of Stockton Economic Development Department is the lead agency responsible for the development of the Consolidated Plan and Annual Action Plan. The Economic Development Department is also the primary agency responsible for the administration and management of programs and projects covered by these Plans.

During the 2022-2023 Program Year the City will:

- Continue to work with private housing developers to expand the availability of affordable housing,
- Continue to participate in the San Joaquin County Continuum of Care Committee,
- Continue implementation of the Housing Element,
- Continue to work with affordable housing developers to ensure that their developments include the facilities to provide the services needed for the residents,
- Continue to work with participants in the establishment of goals and objectives of the Consolidated Plan to ensure measurable progress is made, and
- Update website, provide handouts and program guidelines to keep the public informed.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

To facilitate preparation of the Annual Plan, the City of Stockton consulted with various agencies and organizations located throughout the city and county, including public and assisted housing providers and developers, an assortment of government agencies, as well as private and public health, mental health, and social service agencies. In most cases, these consultations represent a continuation of ongoing interactions between the City and the agency or organizations described.

### **Discussion:**

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	258,010
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>258,010</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Stockton proposes to use its allocation of HOME funds to rehabilitate and construct both rental and owner-occupied housing units and to fund the City's Down Payment Assistance Program (DAP). Most of the funds will be subject to an annual request for developer proposals to be used for an eligible activity, including real property acquisition, site improvements, construction, and rehabilitation costs. The City does not propose to use HOME funds to provide any assistance in a form not included in Section 92.205(b).

Developer proposals for HOME funds are accepted through an annual Notice of Funding Availability (NOFA) identifying the purpose and type of funds available, with announcements sent via email to interested parties and regional developers and posted to the City's website, social media pages and with placement of a public notice in the local newspaper the Record and Spanish publication the Latino Times. To encourage a variety of project types and locations, the City's HOME program does not limit beneficiaries. Applications are made available electronically through the City's online grant application program Neighborly. The competitive applications are reviewed by City staff and/or a committee of regional housing experts and representatives from the community. The applications are next scored through set criteria, including eligible uses, commitment and expenditure deadlines, developer capacity, experience, concurrence with established goals and policies, leveraging, or other requirements. Recommendations concerning funding are then made to the City Council, which holds a publicly noticed hearing to vote on moving forward with the recommended allocations. The City uses a variety of methods to conduct outreach to consumers for all our housing programs, including the (DAP). Information about all the housing programs is posted on the City's website. Economic Development Department staff also participates in various housing workshops and homeownership fairs throughout the year. Notices of these events are sent to the Housing Authority. Advertisements and public notices are also run in local newspapers, including the local Spanish newspaper.

To ensure that households utilizing the City's DAP are ready to undertake and maintain homeownership, the City requires that all households must have completed a minimum eight classroom-hour homebuyer training course given by a HUD-approved trainer prior to the close of escrow. The City also ensures that the households become successful homeowners by making sure that the home they are purchasing is affordable for them. The total housing cost cannot exceed 35 percent of the household's income and their total debt cannot exceed 41 percent of their income.



When HOME funds are allocated for homebuyer assistance or for the rehabilitation of owner-occupied single-family properties, the City utilizes the HOME affordable homeownership annual limits provided by HUD for newly constructed housing and for existing housing.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Stockton's Down Payment Assistance Program requires that units assisted with HOME funds must remain affordable to low-income purchasers for a period based upon the amount of HOME funds provided for the property. To ensure compliance with this affordability period, down payment assistance recapture provisions are incorporated into each property loan and regulatory agreement. Repayment of the HOME subsidy and any accrued interest is due upon the sale or transfer of the property during the affordability period. When the recapture requirement is triggered by a sale (voluntary or involuntary), and there are insufficient net proceeds to repay the City's HOME investment, the City will accept any amount of net proceeds (net proceeds are defined as the sales price minus any senior loan repayment and any closing costs). The City will reinvest these recaptured subsidies into other eligible housing activities.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City's down payment assistance loan programs will continue to provide low-interest, deferred payment loans and/or closing costs' assistance to low-income, first-time homebuyers.

Loan repayments will be recycled to continue the program implementation.

The funds are loaned for 30 years with a simple interest rate of up to 3% for the first 15 years and zero interest for remaining 15 years. Payments are not required during the 30 years; however, the loan principles and interest are due all at once (balloon payment) at the end of the 30 years. Loan repayments will be recycled to continue the program implementation of the DAP.

#### Marketing and Outreach for HOME funded projects

To ensure affirmative marketing of HOME-assisted housing projects, the City has adopted an Affirmative Marketing Policy. The policy has been in use since 2000 and is made a part of all HOME agreements for projects of five or more units. The purpose of the policy is to assure that individuals who normally might not apply for vacant units because they are socially and/or economically

disadvantaged be informed of vacancies, be encouraged to apply, and have an equal opportunity to rent units. The policy establishes methods for informing the public about fair housing laws and affirmative marketing policies; procedures to be used by owners to solicit applications; records that must be maintained; and how the City will assess the success of affirmative marketing actions.

The City also ensures that outreach to minority and women-owned businesses occur for the issuance of all contracts. The City has adopted Affirmative Outreach Action Guidelines for use with all federally funded projects.

Affirmative action requirements are also included in all subrecipient agreements to ensure that if subrecipients are hiring contractors and subcontractors, they adhere to the provisions of the City's Affirmative Action Program and meet all federal requirements.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

For multi-family projects in the City of Stockton, when loaning HOME funds to rehabilitate the units if refinancing is necessary to permit or continue affordability under § 92.252, with a minimum affordability period of 15 years. The project application must demonstrate: that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing; require a review of management practices to demonstrate that disinvestment in the property has not occurred, that the long term needs of the project can be met and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated; state whether the new investment is being made to maintain currently affordable units, create additional affordable units, or both; insure that HOME funds cannot be used to refinance multi-family loans made or insured by any Federal program, including CDBG.

### **Emergency Solutions Grant (ESG) Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

While there is no formal central intake system within the San Joaquin Continuum of Care, all homeless services providers, including those providing homeless prevention and rapid re-housing assistance, utilize the same HMIS. With a single sub-recipient administering prevention and re-housing efforts, a single assessment tool is used for these activities. Further development and improvement of the current HMIS are underway.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City of Stockton will implement the Emergency Solutions Grant (ESG) program in accordance with The McKinney-Vento Homeless Assistance Act As Amended by S.896 HEARTH Act of 2009, found at 24 CFR Part 576, to insure eligible activities are selected and financially managed in accordance with local and federal requirements. The City of Stockton's process for implementing the ESG program is laid out below.

Public Participation. Community Development Committee (CDC) holds annual Kick-off/Needs Assessment Meeting Late Fall (see Action Plan Schedule, and Public Participation Plan)

- Update annual Action Plan Schedule, Application & Instructions
- Issue Public Notice
- Issue NOFA
- Post agenda
- Publish Application & Instructions PDF on City website; provide hard copies for front counter

Applications for Funding. Annual Applications Submitted Mid-January (see Action Plan Schedule)

- Staff reviews applications for eligibility, completeness, ESG requirements per Application Instructions, consistency with the Consolidated Plan, and 24 CFR Part 576
- CDC holds meetings for review and to make recommendations to City Council; agendas posted with Clerk before each meeting, February-March
- Issue Public Notice
- Distribute draft Action Plan requesting public comment
- Subrecipients sent notification correspondence in advance of Council hearing

Award Funds. City Council reviews CDC recommendations at publicly noticed meeting and votes, April

- Action Plan is submitted to HUD via IDIS
- Award letters sent to subrecipients following AAP submittal, including CFDA number

Agreements. Draft agreements with subrecipients and route for signatures, Summer

- Prepare environmental documentation
- Once agreements executed, subrecipients sent notice to proceed
- Set up: Purchase orders once HUD grant agreement executed, Internal HTE and IDIS input

Grant Administration. Administer grants as required per 24 CFR Part 576

- Review and process invoices for reimbursement (see City's Administrative Directive for processing payments and Economic Development Department Payment Processing Procedures)
- Review expenditure deadlines and requirements
- Provide technical assistance to subrecipients, as needed
- Close-out projects as each one wraps up

Monitoring. Monitor subrecipients per Monitoring Schedule and Monitoring Procedures

Reporting. Follow CAPER schedule for end of year reporting requirements

- Gather accomplishment data
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
  5. Describe performance standards for evaluating ESG.

As the largest city within the San Joaquin CoC area, the City of Stockton maintains a seat on the CoC governing body and participates in consultation with the San Joaquin County Community Development Department, and other participating agencies and organizations, regarding the coordination of ESG funding, including how ESG funds are allocated and the identification of performance standards and evaluation outcomes. Under the CoC, the primary contact for the collaborative application is the Central Valley Low Income Housing Corporation (CVLIHC), which is also responsible for administration of the Homeless Management Information System (HMIS).

## Attachments


## Citizen Participation Comments

← → ↻ <https://www.capublicnotice.com>

Stockton CMS City of Stockton CityLink LoanLink - AmeriNat Landmaster Sharepoint OnBase Cnl

### Notice of Hearing

Published in The Stockton Record on March 30, 2022



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**Location**  
San Joaquin County.

**Notice Text**  
NOTICE OF PUBLIC HEARING CITY OF STOCKTON 2022-2023 ACTION PLAN ----- A draft of the City of Stockton's 2022-2023 Action Plan is available for public review. The Action Plan identifies the specific projects that will be funded during the year to help accomplish the goals of the 2020-2025 Consolidated Plan. The 2022-2023 Action Plan includes recommended allocations of funds for three HUD Programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG). Copies of the draft 2022-2023 Action Plan will be available to the public on or after April 3, 2022, on-line at [www.stocktonca.gov/housing](http://www.stocktonca.gov/housing). All interested parties are invited to provide comments. PUBLIC COMMENTS: The 30-day comment period on the Action Plan begins on April 3, 2022 and ends on May 3, 2022. Comments can be made either via email or by mail. Written or email comments must be received before the end of the review period and should be sent to the City of Stockton, Economic Development Department, 400 E Main St. 4th Floor, Stockton, CA 95202 or by email to Melissa Bowen, Housing Manager, at [Melissa.Bowen@stocktonca.gov](mailto:Melissa.Bowen@stocktonca.gov). The public hearing for the 2022-2023 Action Plan is scheduled for 5:30 pm on May 3, 2022, City Council Chambers, City Hall, 425 N. El Dorado Street, Stockton, CA. If you wish to make a comment after the meeting has begun, please submit your comment via email to the City Clerk at [City.Clerk@stockton.ca.gov](mailto:City.Clerk@stockton.ca.gov). Your comment will be shared with the City Council and placed into the record at the Council meeting. The purpose of the public hearing is to allow citizens an opportunity to comment on the document. Following the public hearing, the Council will take final action by adopting the Action Plan as presented or modify as the Council deems appropriate. If you are disabled and require a copy of this public notice, in an appropriate alternative format or if you need other accommodation, please contact the Office of the City Clerk located at 425 N El Dorado St. Stockton, CA 95202 during regular business hours or by calling (209) 937-8458. ELIZA R. GARZA, CMC CITY CLERK CITY OF STOCKTON #268617 3/30/22

**NOTICE OF PUBLIC HEARING  
CITY OF STOCKTON  
2022-2023 ACTION PLAN**

A draft of the City of Stockton's 2022-2023 Action Plan is available for public review. The Action Plan identifies the specific projects that will be funded during the year to help accomplish the goals of the 2020-2025 Consolidated Plan. The 2022-2023 Action Plan includes recommended allocations of funds for three HUD Programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG).

Copies of the draft 2022-2023 Action Plan will be available to the public on or after April 3, 2022, on-line at [www.stocktonca.gov/housing](http://www.stocktonca.gov/housing). All interested parties are invited to provide comments.

**PUBLIC COMMENTS:** The 30-day comment period on the Action Plan begins on April 3, 2022 and ends on May 3, 2022. Comments can be made either via email or by mail.

Written or email comments must be received before the end of the review period and should be sent to the City of Stockton, Economic Development Department, 400 E Main St, 4th Floor, Stockton, CA 95202 or by email to Melissa Brown, Housing Manager, at [Melissa.Brown@stocktonca.gov](mailto:Melissa.Brown@stocktonca.gov).

The public hearing for the 2022-2023 Action Plan is scheduled for 5:30 pm on May 3, 2022, City Council Chambers, City Hall, 425 N. El Dorado Street, Stockton, CA.

If you wish to make a comment after the meeting has begun, please submit your comment via email to the City Clerk at [City.Clerk@stocktonca.gov](mailto:City.Clerk@stocktonca.gov). Your comment will be shared with the City Council and placed into the record at the Council meeting.

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ELIZA R. GARZA, CMC  
CITY CLERK  
CITY OF STOCKTON  
#288817 3/30/22

No.	Channel	Comment	Response
1	May 3, 2022 City Council Public Hearing	No written comments were received in response to public notice.	N/A
2		Councilmember Warmley asked if the city monitor and addresses housing discrimination complaints and what is the number of complaints received.	The Economic Development Department does not investigate complaints of discrimination. The City contracts with Fair Housing of San Joaquin County and the California Rural Legal Assistance (CRLA) to provide legal services to its low-income residents. CRLA has documented approximately 66 housing discrimination complaints within the past year. CRLA reported that complaints often begin with issues around habitability; however, when the legal representative meets with the person and conducts an interview, additional issues come up including housing discrimination or the need for a reasonable accommodation or reasonable modification.
3		Councilmember asked how are grantees selected?	The City selects sub-recipients through a competitive NOFA process that assesses whether or not the request for funding is an identified need as outlined in the City's Needs Analysis. Additionally, staff tracks the expenditure rates of returning applicants to evaluate their expenditures and whether they expend all of their allocation of funds.
4		Councilmember inquired where the housing program income came from.	Staff responded that Program Income comes from loan repayments of previously funded affordable housing projects.
5		Visionary Homebuilders thanked the council for the approval of their request to provide first-time homebuyers, education classes.	No comment.
6			





## 2150 E. Hattner Lane • Stockton

## Legal Notices

## Legal Notices

[illegible]

## A black and white photograph showing a modern building interior. On the left, there are large glass windows or doors. In the center, a staircase with a dark railing leads up. The architecture is contemporary with clean lines and a mix of materials. The lighting is dramatic, with strong shadows.

professional services

Title: Publication Request  
Submitted By:  
Submitted On: Feb 7, 2020 3:22 PM

Publication Request Notices to the Record for publication require 5 days lead time.			
Department *	EDD	RFP/PUR/PRJ/PH/PN *	Public Notice
PUR/PRJ/RFP Number		Subject/Title for Publication *	Notice of Funding Availability and Public Meeting
Contact Person *	Margarita Reyes	Contact Number *	7421
Additional Contact *	Adelaida Gonzalez	Contact Number *	7569
Account Number for Publication Cost *	054-8120-640.20-52	Account Number for Staff Time (Bids Only)	
Publication Information / Account: 2099378863			
Requested Publication Date(s) *	February 17, 2020		
Bid Opening OR Meeting Date *	April 14, 2020		
Text for Publication in the Record *	<p>PUBLIC NOTICE  City of Stockton 2020-2025 Consolidated Plan  and Analysis of Impediments to Fair Housing Choice</p> <p>The 2020-2025 Consolidated Plan describes the City's identified priorities in assessing housing and community needs and facilitates the implementation and accountability of meeting its stated goals and objectives for three Federal Grant Entitlement Programs under the U.S. Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) through annual action plans and annual performance evaluation reports. As part of the Consolidated Plan, an Analysis of Impediments to Fair Housing Choice is required to provide an assessment of barriers and impediments to fair housing choice.</p> <p>Copies of the draft 2020-2025 Consolidated Plan and draft of the Analysis of Impediments to Fair Housing Choice will be available to the public on or after February 17, 2020, at the following accessible location: Economic Development Department, 400 E. Main Street, 4th Floor, Stockton, or on-line at <a href="http://www.stocktonca.gov/housing">www.stocktonca.gov/housing</a>. All interested parties are invited to provide comments. The 30-day comment period begins on February 17, 2020 and ends on March 17, 2020.</p> <p>If you are disabled and require a copy of this public notice, in an appropriate alternative format; or if you require other accommodation, please contact the Office of the City Clerk located at 425 N. El Dorado St., Stockton, CA 95202 during normal business hours or by calling (209) 937-8459.</p> <p>All written comments on the 2020-2025 Consolidated Plan must be received on or before March 17, 2020, by 5:00 p.m., and are to be sent to Ty Wilson-Robinson, Housing Manager, City of Stockton, Economic Development Department, 400 E. Main Street, 4th Floor, Stockton 95202. Oral comments may be made at the public hearing scheduled for 5:30pm on April 14, 2020, City Council Chambers, City Hall, 425 N. El Dorado Street, Stockton, CA. The purpose of the public hearing is to give citizens an opportunity to comment on the documents. Following public hearing, the Council will take final action by adopting the Consolidated Plan and Analysis of Impediments to Fair Housing Choice as presented or modify as the Council deems appropriate.</p> <p>ELIZA R. GARZA, CMC  CITY CLERK  CITY OF STOCKTON</p>		
For Clerk Use			
Date sent to Record	yyyy/mm/dd	Date Affidavit Received	yyyy/mm/dd
AFP Number			

Publication Proof	
<b>Bid Award Follow Up</b>	
Unsuccessful Security Returned	
Successful Security Returned	
Bid Award Resolution/Motion	

bae urban economics

## Analysis of Impediments to Fair Housing Choice

Prepared for the City of Stockton  
February 4, 2020

Approved by the City Council  
April 28, 2020



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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. 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.

#### ***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.

#### **Existing Conditions and Socioeconomic Context**

The City of Stockton is the largest population center in San Joaquin County and the second largest city in the larger San Joaquin Valley. The available demographic data indicate that the city also represents one of the most diverse communities in the region, where members of racial and ethnic minority groups, when considered together, account for nearly 76 percent of the population. In other words, Stockton is a "minority-majority" community. An evolution of the relative distribution of minority residents indicated that such households are more evenly distributed throughout the community than in other jurisdictions throughout California. Despite this, there are a number of areas of the city with disproportionate concentrations of minority residents. The AI analysis also included a brief evaluation of isolation index values, which indicate relatively low levels of racial and ethnic segregation.

Additional analysis indicated that areas of high minority concentration also generally correspond with areas with high concentrations of low- and moderate-income households, as identified by HUD. Lower income households, particular renter households, tend to experience housing problems, such as housing cost overpayment (i.e., more than 30 percent of household income), crowding (i.e., more than 1.5 persons per room), and substandard housing (i.e., unit lacks necessary infrastructure or appliances). Generally, lower income neighborhoods, such as downtown and northern Stockton, have adequate access to employment opportunities and public transportation. However, the analysis found that south Stockton is relatively isolated from employment opportunities and lacks sufficient public transportation infrastructure necessary to facilitate timely transit to and from employment and other amenities and services. Additionally, the analysis found that overall, the City's existing public transportation system does not provide access to industrial employment areas, making it difficult for many lower income residents throughout the city to secure and maintain gainful employment.

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 person 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 Stockton is skewed toward lower-density single-family housing units. Just over one quarter of the housing stock is comprised of multifamily housing units, which is below the statewide average of 31 percent. With the exception of southern Stockton, the city's multifamily housing stock tends to be located in areas that correspond with high concentration of minority and lower income residents. Though the city experienced considerable growth in recent decades, the majority of this growth has occurred in the form of single-family housing developments, primarily located on the urban fringe. Stockton's housing stock tends to be comprised of larger units, with very few studio- and one-bedroom units, which are typically more affordable housing options for smaller renter and owner households. As such, many smaller lower income households are likely overpaying for units that are larger than necessary for their needs or living together with other families in order to afford larger housing units.

The Neighborhood Services Division (NSD) of the Stockton Police Department carries out code enforcement activities, processing an average of 811 housing code cases each year. These violations include structural issues, exposed wiring, and exterior housing problems. Additionally, the NSD implements the Residential Rental Inspection Program (RRIP), which specifically targets inspection of residential rental properties. Most of the housing code enforcement and RRIP cases involve single-family units and are geographically concentrated in the city's older neighborhoods, such as the downtown, midtown and South Stockton areas, due to the presence of many buildings that were constructed in the late 19<sup>th</sup> and early 20<sup>th</sup>

centuries and have not received substantial rehabilitation. Other areas with large concentrations of housing code enforcement and RRIP cases include residential neighborhood to the south east of March Lane and El Dorado Street, and in north Stockton north of East Hammer Lane.

The Housing Authority of the County of San Joaquin (HACSJ) operates two below market rate public housing communities in Stockton, including Conway Homes and Sierra Vista Homes, which currently contain a total of 741 subsidized housing units. The HACSJ is currently in the second phase of a multiphase redevelopment of Sierra Vista. Prior to the redevelopment project, Sierra Vista had 396 units. By the end of the redevelopment project these units will be replaced by 500 to 550 new units depending on the final project specifics, resulting in a net increase of 104 to 154 new units. This would bring the total number of public housing units in Stockton to between 936 and 986 units once redevelopment of Sierra Vista is complete. Additionally, there are 3,608 housing units affordable to lower-income households that are contained in 53 projects throughout the City of Stockton.

The HACSJ currently administers 5,174 the Housing Choice Voucher (HCV) throughout San Joaquin County, 3,611 of which are utilized in the City of Stockton. The majority of HCVs are tenant-based, meaning the vouchers are issued to individual households who are then responsible for locating suitable housing. However, many HCV holders struggle to the ability to find landlords willing to accept HCV's. As such, 22 percent, or 1,150 HCVs, remain unutilized countywide.

#### **Public and Private Sector Impediments**

For a number of legal and legislative reasons, the City of Stockton completed an update to the General Plan, which was adopted in December 2018. The Envision 2040 General Plan represents a significant shift away from the City's historical pattern of periphery development to urban infill development and redevelopment by allowing for more flexible development standards and higher permitted densities in more urban areas of the city. These code changes will allow the City to implement not just procedural changes, but to update and streamline outdated land use practices. The existing municipal code is in compliance with applicable fair housing laws, both state and federal. These include the City's density bonus ordinance, provisions for second units, and policies associated with the siting of homeless shelters and transitional housing facilities. Based on a review of the City's existing development impact fee schedule, a 2013 review identified the need to conduct a comprehensive update of the Capital Facilities Fees, as well as reform of the Community Development Department fees, in order to ensure that the fees charged are commensurate with the impact and sufficient to offset departmental costs. In 2019 the Until resolved, these issues may represent potential public sector impediments.

An additional analysis of potential private sector impediments to fair housing choice indicates that low- and moderate-income households, as well as minority households, are not

significantly underrepresented among home loan approvals and originations within the City of Stockton. As a result, mortgage lending practices are not considered to represent an impediment to fair housing, though vigilant efforts should continue, to prevent discrimination and discourage predatory lending.

#### **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 City of Stockton, with a large proportion being dismissed due to a lack of cause. Consultation with the San Joaquin Fair Housing Association (SJFH) indicates that the majority of fair housing complaints submitted by complainants within the City of Stockton are not based on discrimination but are the result of landlord-tenant disputes. Additional data regarding hate crimes, which can represent an impediment to the degree that events discourage households from residing in certain areas, indicate that Stockton has a lower prevalence of hate-based crimes than does the state as a whole.

Fair housing services within the broader San Joaquin County community are primarily provided by SJFH. 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 and provides fair housing testing on a case-by-case basis.

#### **Recommended Actions**

Following are actions recommended to address fair housing issues within the City of Stockton during the 2020-2025 time period.

#### **General Recommendations**

**Action 1:** Use the Consolidated Plan and AI as mechanisms to increase awareness and participation in fair housing issues. The City should utilize the Consolidated Plan and AI adoption and implementation processes to raise community awareness of the identified barriers to fair housing choice. Hearings and public meetings associated with the planning and implementation should be advertised in the media and members of the public should be invited to participate and provide substantive input.

**Action 2:** Periodically monitor progress toward implementation of the AI recommendations. City staff should utilize the existing Consolidated Plan reporting process to consistently monitor and track the progress made toward implementation. This could also include an annual report on the actions taken by area fair housing service providers, including an inventory of the

services provided, the number of clients served, the results of fair housing testing, and a breakdown of fair housing cases by type, including evaluation of key client characteristics.

#### ***Access to Information***

**Action 3:** Maintain links on appropriate pages of the City's website that direct visitors to housing services and resources, fair housing information, and consumer information. Ensure that information regarding the housing services provided by the City and its partners, including SJFH, is available at designated locations throughout the community, including but not limited to City offices, public libraries, community and civic centers, and other public facilities, particularly those public offices frequented by members of vulnerable populations, such as the elderly, disabled, minorities, and low-income households.

**Action 4:** Conduct annual trainings, seminars, and information sessions with key City staff who administer and oversee housing programs and code enforcement activities to ensure that these staff are able to accurately provide guidance and referrals with regard to fair housing and landlord-tenant issues.

**Action 5:** To the extent possible with limited funding, support SJFH in expanding access to its services by increasing the number of hours the office is open and the number of hours that the phones are answered.

**Action 6:** Continue to support and, where possible, expand programs that provide 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. This may include providing support to SJFH, as well as other agencies and organizations, including providing funding to continue and expand existing city programs.

#### ***Fair Housing Services and Outreach***

**Action 7:** Collaborate with other local jurisdictions to explore additional funding sources that may be leveraged to develop and maintain a program for comprehensive fair housing testing. This should include a dialogue intended to identify the most appropriate provider of these services (e.g., SJFH), as well as to determine ways in which each jurisdiction can contribute, so as to preserve and expand the capacity of organization that administers the testing program.

**Action 8:** Maintain and intensify code enforcement efforts focused on identifying substandard housing units and ensure, to the extent practicable given available resources, supplemental funding for lower-income households necessary to facilitate prompt and satisfactory remediation of identified issues and avoid displacement. Efforts should be coordinated with

other appropriate code and law enforcement activities, as well as the provision of assorted supportive and fair housing services.

**Action 8:** Maintain and expand support necessary for fair housing service providers to conduct fair housing trainings, workshops, and information sessions for residents, property managers and landlords, providing appropriate translation services where possible and necessary.

#### *Home Purchase, Lending, and Foreclosure*

**Action 9:** Work with financial institutions to encourage marketing of financial services to all segments of the community. For example, lenders in the subprime market were effective in utilizing community resources, local “cultural brokers,” and affinity group marketing strategies, which indicates that lenders operating in the prime market may also benefit from similar marketing approaches, which can improve access to financing for lower-income and minority populations.

#### *Public Policies and Programs*

**Action 9:** Leverage the ongoing comprehensive amendment process to address potential barriers to affordable and fair housing, including those identified in the Housing Element. This may also include policies intended to encourage additional affordable housing development in areas of high opportunity, such as moderate- and above moderate-income neighborhoods, though policies should not be crafted in such a way as to discourage affordable housing in any location area otherwise deemed appropriate for residential uses.

**Action 10:** Pursue a comprehensive update of the City’s development impact fees, including the Capital Facilities Fees and Community Development Department fees to ensure that the fees charged are commensurate with the impact and sufficient to offset departmental costs.

**Action 11:** Continue to comply with applicable antidiscrimination requirements, including, but not limited to, all applicable federal regulations associated with the use of CPD grant funds under the CDBG, HOME, and ESG programs

**Action 12:** Work with local and regional public transportation service providers to expand and enhance access connections between lower income neighborhoods such as south Stockton employment centers not well served by public transit.

**Action 13:** Support efforts to rehabilitate or newly construct smaller studio- and one-bedroom units which are affordable to lower-income households.

**Action 14:** Work with the Central Valley Low Income Housing Corporation and the Housing Authority of San Joaquin County to support and enhance programs to incentivize acceptance of Housing Choice Vouchers.

**Action 15:** Explore the need for and feasibility of policies which protect renters from eviction or retaliatory measures from landlords (i.e., retaliation for code enforcement complaints, particularly for undocumented renters).



## 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.<sup>1</sup> 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 City of Stockton, California, identifies actions to be taken between July 2020 and June 2025. The AI will be submitted along with the City of Stockton Consolidated Plan to the U.S. Department of Housing and Urban Development (HUD) to support grant applications for federal entitlement funding for housing programs. The AI is divided into five distinct sections, which are as follows:

**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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<sup>1</sup> 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>

#### ***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.<sup>2</sup>

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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<sup>2</sup> 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.

## 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:

**Under Federal Law**

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

**Under California Law**

- 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 City of Stockton General Plan Housing Element, the 2015-2020 San Joaquin County and City of Stockton Consolidated Plan, and the draft 2020-2025 City of Stockton 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 – 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 the City of Stockton and develop clear strategies and implementing actions to overcome them.

To facilitate preparation of the AI, the City of Stockton and its consultant conducted one-on-one consultations with various agencies and organizations located throughout the city and county, including public and assisted housing providers and developers, an assortment of government agencies, as well as private and public health, mental health, and social service agencies. Additionally, the City held four focus group meetings with key stakeholders including some of the organizations that participated in one-on-one consultations in addition to local chambers of commerce, business owners, professional organizations, and members of the public. The focus group topics included: housing, business development, economic development, and issues pertinent to the Central City. These meetings were open to the public and advertised in the local newspaper. In most cases, these consultations represent a continuation of ongoing interactions between the City and the organizations described. In total, the City consulted with 25 organization one-on-one, with an additional 38 organizations or community members participating in one or more of the focus groups. Some organizations participated in both the consultations and focus group discussions. In total, the City consulted 58 unique organizations or members of the public. See Appendix A for a list those organization and individuals who participated in the focus group meetings and one-on-one consultations.

## SECTION 2 – EXISTING CONDITIONS

### 2.1 – Population and Age Trends Ethnic

According to Census and DoF data, San Joaquin was the second fastest growing county in California, between 2010 and 2018 in terms of average annual growth rate and the 12<sup>th</sup> fastest growing county in terms of total population growth. During this period, the county gained 73,438 new residents. With an average annual growth rate of around 1.3 percent per year, the countywide population grew 0.4 percentage points per year faster than the statewide population. Reflecting a return to pre-recession levels in the economy, the population growth rate began to slowly pick up its pace in the later part of the 2010 to 2018 time-period. From 2010 to 2014, the county population grew at an annual average of 0.9 percent, while from 2014 to 2018 it grew at an annual average of 1.2 percent. Though this growth rate is still behind the 2000 to 2010 growth rate of two percent per year, this demonstrates an upward trend as the economy moves farther from the 2008 economic recession.

The City of Stockton represents the largest incorporated community in San Joaquin County and the third largest city in the San Joaquin Valley, behind Fresno and Bakersfield. Between 2010 and 2018, the city gained 23,396 new residents, at an annual average rate of 1.0 percent per year, which is below the countywide average of 1.3 percent per year but above the statewide average of 0.8 percent per year. Similar to the county as a whole, population growth in the city slowed considerably between 2010 and 2014 but began recovering from 2014 to 2018. During the period between 2014 and 2018, the city gained approximately 14,800 new residents. This equals an average annual growth rate of 1.2 percent, which, again, was slightly below the countywide average of 1.6 percent, but above the statewide rate of 0.8 percent per year.

**Table 1: Population Growth Trends, City of Stockton and San Joaquin County, 2000 to 2018**

Year	City of Stockton	San Joaquin County
2000	243,771	563,566
2001	248,520	578,121
2002	254,469	596,039
2003	261,710	612,295
2004	270,136	629,787
2005	277,485	645,059
2006	282,869	656,247
2007	285,750	665,304
2008	287,093	672,492
2009	288,591	677,633
2010	291,707	685,306
<b>Annual Change '00-'10</b>	<b>1.8%</b>	<b>2.0%</b>
2011	291,712	691,689
2012	295,346	698,555
2013	297,637	704,739
2014	300,275	712,134
2015	305,303	723,856
2016	308,746	735,319
2017	311,724	747,263
2018	315,103	758,744
<b>Annual Change '10-'18</b>	<b>1.0%</b>	<b>1.3%</b>

Sources: California Department of Finance, E-4, 2018; BAE, 2019.

Corresponding with broader trends throughout California and nation, both the City of Stockton and San Joaquin County shows signs of an aging population, though the population in the City of Stockton appears somewhat younger on average, compared to the county as a whole. For example, the median age in the City of Stockton was in 2010 was 30.8 years, which increased to an average 32.2 years between 2013 and 2017. The median age in San Joaquin County as a whole was 32.7 in 2100, which increased to an average of 33.9 between 2013 and 2017. The City of Stockton shows two clear waves moving through the age categories. For example, while the proportion of residents who are under the age of 18 declined by 2.6 percent and the proportion of residents between 18 and 24 years of age declined two percent, the proportion of residents who are age 25 through 4 increases 12.1 percent. There is a similar, more dramatic shift among middle age residents, with limited growth in the proportion of the population between the ages of 35 and 54, which corresponds to an increase in the proportion of residents who are 55 years or older. Additional data for San Joaquin County as a whole, shown in Table 2, show a similar trend, except that countywide the proportion of residents age 18 to 24 years increased.

**Table 2: Age Distribution, City of Stockton and San Joaquin County, 2000 and 2013-2017**

Age Range	City of Stockton			
	2010		2017	
	Number	Percent	Number	Percent
Under 18	87,338	29.9%	85,060	27.9%
18-24	34,126	11.7%	33,431	11.0%
25-34	40,162	13.8%	45,039	14.8%
35-44	36,529	12.5%	37,014	12.2%
45-54	35,398	12.1%	35,738	11.7%
55-64	28,902	9.9%	32,292	10.6%
65-74	15,823	5.4%	21,205	7.0%
75-84	9,192	3.2%	9,691	3.2%
85 years & older	4,237	1.5%	4,888	1.6%
<b>Total, All Ages</b>	<b>291,707</b>	<b>100%</b>	<b>304,358</b>	<b>100%</b>

Age Range	San Joaquin County			
	2010		2017	
	Number	Percent	Number	Percent
Under 18	200,724	29.3%	200,364	27.7%
18-24	71,312	10.4%	72,932	10.1%
25-34	90,815	13.3%	99,215	13.7%
35-44	90,738	13.2%	93,186	12.9%
45-54	91,839	13.4%	92,299	12.7%
55-64	68,697	10.0%	79,619	11.0%
65-74	38,530	5.6%	50,648	7.0%
75-84	22,709	3.3%	24,910	3.4%
85 years & older	9,942	1.5%	10,980	1.5%
<b>Total, All Ages</b>	<b>685,306</b>	<b>100%</b>	<b>724,153</b>	<b>100%</b>

Sources: U.S. Census Bureau, 2000 Census and ACS 2017 5-year sampling period, P12, B01001; BAE, 2019.

## 2.2 – Racial and Ethnic Characteristics

In 1970, more than 90 percent of the countywide population identified as non-Hispanic White. Over the past 40 plus years, San Joaquin County and the City of Stockton have become considerably more diverse, in terms of both race and ethnicity. As reported in Table 3, an estimated 24.3 percent of Stockton residents identified as non-Hispanic White, according to the 2006-2010 ACS. The remaining 75.7 percent belonged to one or more of the city's minority populations. The most prevalent minority groups included Hispanic/Latino individuals, who comprised 38.8 percent of the population. Other important minority groups included non-Hispanic Asians which accounted for 21.2 percent of the city's population, and Black or African American individuals who accounted for 11.4 percent of the population.

According to the 2013-2017 ACS, the proportion of Stockton residents who identify as non-Hispanic White decreased to 21.2 percent. Consequently, the proportion of minority residents residing in the city increased to 78.8 percent. Of these, Hispanic and Latino residents still account for the largest share, representing 42.2 percent of the citywide population. The proportionate representation of Asian and Black or African American residents remained



relatively stable, with these two groups accounting for an estimated 21.2 percent and 11.1 percent of the citywide population, respectively.

**Table 3: Population by Race and Ethnicity, City of Stockton and San Joaquin County, 2006-2010 and 2013-2017**

	City of Stockton			
	2010		2017	
	Number	Percent	Number	Percent
<b>Non-Hispanic or Latino</b>				
White alone	66,727	24.3%	64,568	21.2%
Black or African American alone	32,665	11.4%	33,699	11.1%
American Indian and Alaska Native alone	1,216	0.4%	695	0.2%
Asian alone	61,000	21.2%	64,403	21.2%
Native Hawaiian and Other Pacific Islander alone	1,543	0.5%	2,207	0.7%
Some other race alone	333	0.1%	296	0.1%
Two or more races	9,366	3.3%	10,039	3.3%
<b>Subtotal, All Non-Hispanic or Latino</b>	<b>175,850</b>	<b>61.2%</b>	<b>175,907</b>	<b>57.8%</b>
<b>Hispanic or Latino</b>				
White alone	63,102	22.0%	69,053	22.7%
Black or African American alone	1,806	0.6%	1,325	0.4%
American Indian and Alaska Native alone	2,020	0.7%	1,283	0.4%
Asian alone	1,633	0.6%	1,509	0.5%
Native Hawaiian and Other Pacific Islander alone	13	0.0%	230	0.1%
Some other race alone	34,999	12.2%	35,549	11.7%
Two or more races	7,954	2.8%	19,502	6.4%
<b>Subtotal, All Hispanic or Latino</b>	<b>111,527</b>	<b>38.8%</b>	<b>128,451</b>	<b>42.2%</b>
<b>Total, All Races and Ethnicities</b>	<b>287,377</b>	<b>100.0%</b>	<b>304,358</b>	<b>100.0%</b>
	San Joaquin County			
	2010		2017	
	Number	Percent	Number	Percent
<b>Non-Hispanic or Latino</b>				
White alone	251,081	37.3%	240,170	33.2%
Black or African American alone	46,449	6.9%	48,175	6.7%
American Indian and Alaska Native alone	3,101	0.5%	1,668	0.2%
Asian alone	93,909	13.9%	106,817	14.8%
Native Hawaiian and Other Pacific Islander alone	3,180	0.5%	3,781	0.5%
Some other race alone	1,258	0.2%	874	0.1%
Two or more races	20,864	3.1%	27,062	3.7%
<b>Subtotal, All Non-Hispanic or Latino</b>	<b>419,842</b>	<b>62.3%</b>	<b>428,547</b>	<b>59.2%</b>
<b>Hispanic or Latino</b>				
White alone	147,658	21.9%	164,636	22.7%
Black or African American alone	2,812	0.4%	2,258	0.3%
American Indian and Alaska Native alone	3,982	0.6%	2,636	0.4%
Asian alone	2,670	0.4%	2,542	0.4%
Native Hawaiian and Other Pacific Islander alone	131	0.0%	452	0.1%
Some other race alone	79,634	11.8%	79,662	11.0%
Two or more races	16,884	2.5%	43,420	6.0%
<b>Subtotal, All Hispanic or Latino</b>	<b>253,771</b>	<b>37.7%</b>	<b>295,606</b>	<b>40.8%</b>
<b>Total, All Races and Ethnicities</b>	<b>673,613</b>	<b>100.0%</b>	<b>724,153</b>	<b>100.0%</b>

Sources: U.S. Census Bureau, American Community Survey (ACS) 2010 5-year and 2017 5-year sampling period, B03002; BAE, 2019.

The data described above indicate that minority residents account for a larger share of the population than they did in the year 2010. While Asian and African American residents have maintained their proportionate share of the total citywide population, Hispanic residents account for a much larger share of the total population than they did almost a decade prior. As a result, Asians and African Americans account for a slightly smaller share of the citywide minority population than they did in 2010, while Hispanic residents account for a larger share of the city's minority residents.

**Table 4: Minority Populations, City of Stockton and San Joaquin County, 2006-2010 and 2013-2017**

City of Stockton				
	2010		2017	
Minority Groups	Number	Percent	Number	Percent
Black or African American	32,665	15.0%	33,699	14.1%
Asian	61,000	28.0%	64,403	26.9%
Hispanic	111,527	51.2%	128,451	53.6%
Other Minority	12,458	5.7%	13,237	5.5%
<b>Total, All Minority Groups</b>	<b>217,650</b>	<b>100%</b>	<b>239,790</b>	<b>100%</b>
<b>% of total Population</b>	<b>75.7%</b>		<b>78.8%</b>	

San Joaquin County				
	2010		2017	
Minority Groups	Number	Percent	Number	Percent
Black or African American	46,449	11.0%	48,175	10.0%
Asian	93,909	22.2%	106,817	22.1%
Hispanic	253,771	60.1%	295,606	61.1%
Other Minority	28,403	6.7%	33,385	6.9%
<b>Total, All Minority Groups</b>	<b>422,532</b>	<b>100%</b>	<b>483,983</b>	<b>100%</b>
<b>% of total Population</b>	<b>62.7%</b>		<b>66.8%</b>	

Sources: U.S. Census Bureau, ACS 2010 5-year and 2017 5-year sampling period, B03002; BAE, 2019.

#### ***Geographic Concentrations of Race and Ethnicity***

For the purpose of this report, census block groups with high geographic concentrations of minority residents and Hispanic/Latino residents are defined as those with concentrations that are 20 percent above the citywide average. Because non-White residents account for a majority of the population in Stockton, it is impractical to apply the typical threshold of twice the citywide share for the identification of high geographic concentrations, since in many cases twice the citywide share would necessarily equal greater than 100 percent of the population. Figure 1 illustrate the geographic distribution of residents by race and ethnicity for Census Block Groups located in the City of Stockton, as reported by the 2013-2017 ACS, with Block Groups containing a high concentration of minority and Hispanic/Latino residents outlined in red. It is important to recognize that the proportionate concentration of minority residents within each area is calculated based on estimates of the minority population residing within a given Block Group, divided by the estimated total population. Note that if the resident

population within a given Block Group is relatively small, even a small number of minority residents can result in a high proportionate minority concentration.

As illustrated in Figure 1, there are above average concentrations of minority residents in downtown Stockton, particularly in the area south of West Park Street and east of the San Joaquin River. This concentration also extends southward to include most of the Block Groups located south of the Ort. J. Lofthus Freeway (Hwy 4) and extends southward toward the Stockton Metropolitan Airport. The city also has above average concentrations of minority residents in areas of north Stockton extending from the Calaveras River northward toward East Morada Lane. This area extends from the railroad tracks near Holman Road, westward to North El Dorado Street, and Lower Sacramento Road. The data also indicate a smaller concentration of minority residents located along Interstate 5 (I-5) near West Hammer Lane.

Figure 2 through Figure 6 illustrate the city's minority concentrations in greater detail. For example, Figure 2 illustrates that American Indian residents are primarily concentrated in downtown Stockton, as well as in isolated pockets scattered throughout the city. Asian residents, by comparison, are more highly concentrated in the northeastern and southwestern quadrants of the city. The northeastern concentration includes an area that extends north of March Lane and east from the railroad tracks near Tam-O-Shanter Drive, as can be seen in Figure 3. The other main concentration of Asian residents is in Stockton's southwestern quadrant, which extends southward from Highway 4 and to the west from Interstate 5.

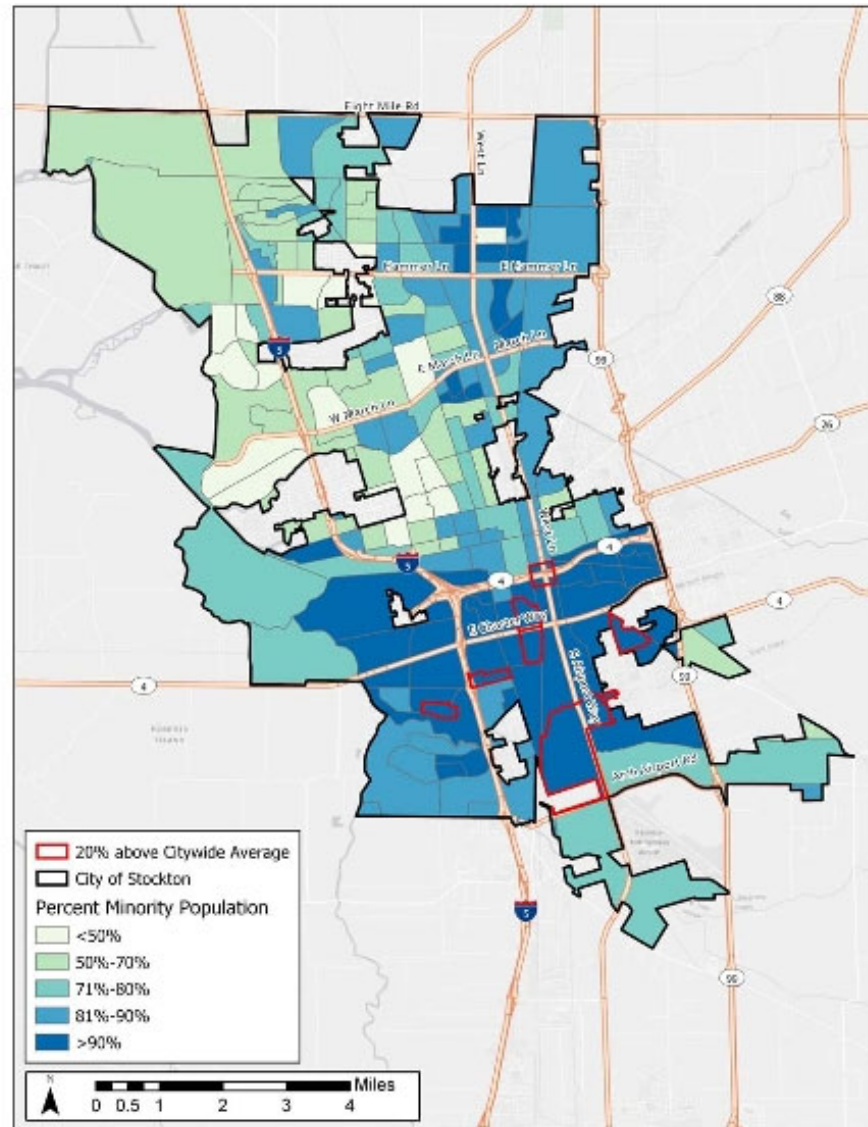
Figure 4 shows there are a number of neighborhoods throughout Stockton with high proportionate concentrations of Black or African American residents. The areas with the highest proportionate representation include parts of downtown Stockton, as well as a portion of southern Stockton that extends southward from Dr. Martin Luther King Jr. Boulevard to Arch Airport Road, to the east of the railroad lines. There is also a notable concentration of African American residents in the southwestern quadrant of the city, which extends south of Highway 4 and west of I-5, as well as in other scattered pockets located throughout the city.

As noted earlier, Hispanic and Latino residents make up the largest individual minority group within the city. Figure 5 illustrates that large portions of the city, including the central city, and most of south Stockton, feature above average concentrations of Hispanic and Latino residents. It is also notable that several Block Groups had a percentage of Hispanic and Latino residents that was 20 percent greater than the citywide average. In addition to large areas of central Stockton, there is a significant concentration of Hispanic and Latino residents in south Stockton, as well as throughout the census tracts that are directly adjacent to the western border of the city.

Native Hawaiian or Pacific Islander residents tend to live in scattered areas throughout the northern portion of the city, as shown in Figure 6. Notable concentrations include the neighborhoods in and around Hammer Lane and the City's northern boundary, as well as the

portion of the city between Hwy 99 and Hwy 88. There are also notable concentrations of Native Hawaiian or Pacific Islander residents in the southwest quadrant of the city between Charter Way and Hwy 4, as well as the corner of the city where French Camp Road and I-5 intersect.

**Figure 1: Percent Minority by Census Block Group, City of Stockton, 2013-2017**



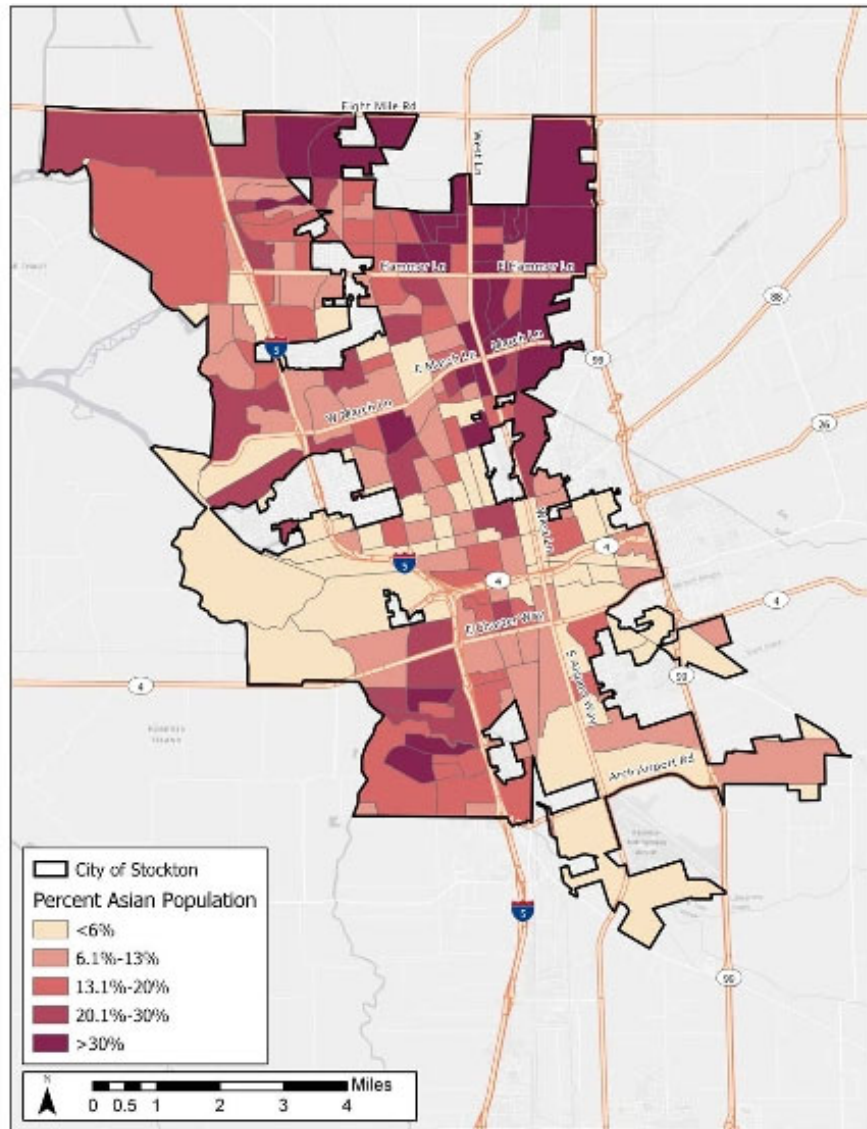
Sources: City of Stockton, 2019; U.S. Census Bureau, TIGER, 2018, ACS 2017 5-year sampling period, B03002; BAE, 2019.

**City of Stockton**  
**Percent Native American Population**

- 0%
- 0.1%-0.5%
- 0.6%-1%
- 1.1%-2%
- >2%

0 0.5 1 2 3 4 Miles

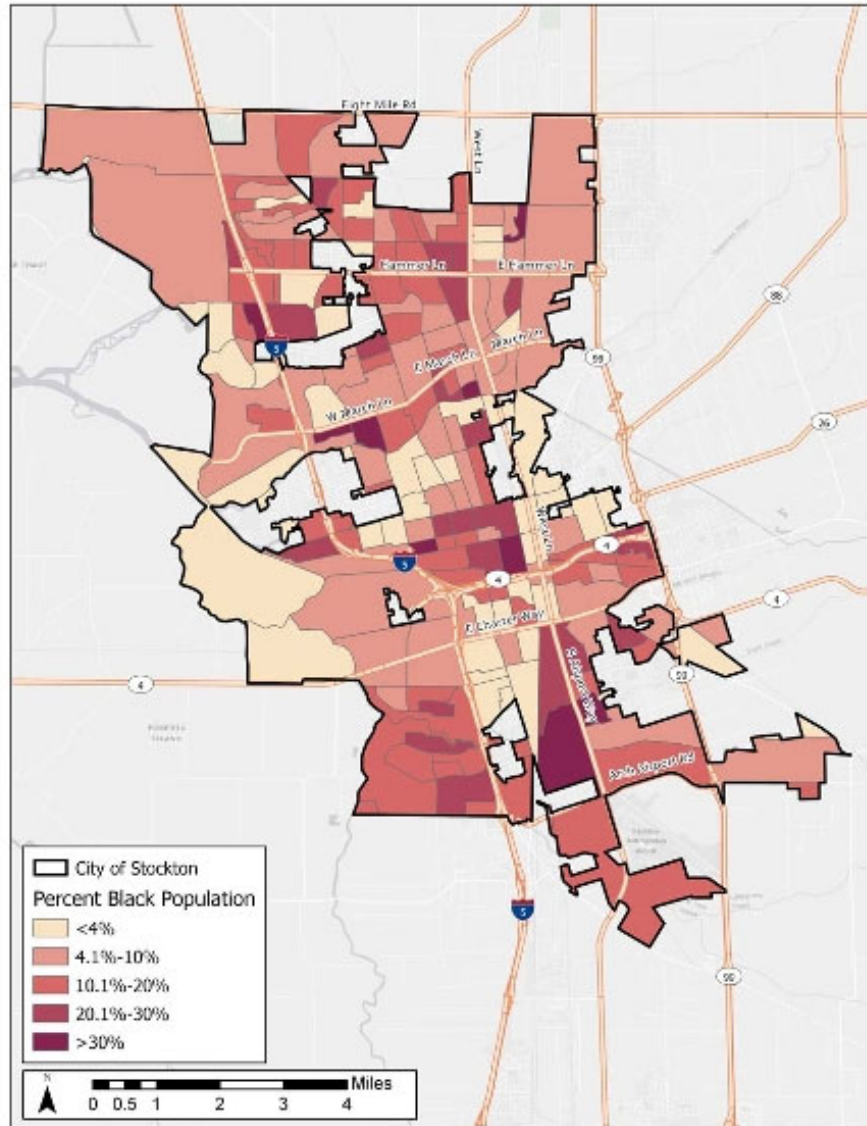
**Figure 3: Percent Asian by Census Block Group, City of Stockton, 2013-2017**



Sources: City of Stockton, 2019; U.S. Census Bureau, TIGER, 2018, ACS 2017 5-year sampling period, B03002; BAE, 2019.



**Figure 4: Percent Black/African American by Census Block Group, City of Stockton, 2013-2017**



Sources: City of Stockton, 2019; U.S. Census Bureau, TIGER, 2018, ACS 2017 5-year sampling period, B03002, BAE, 2019.



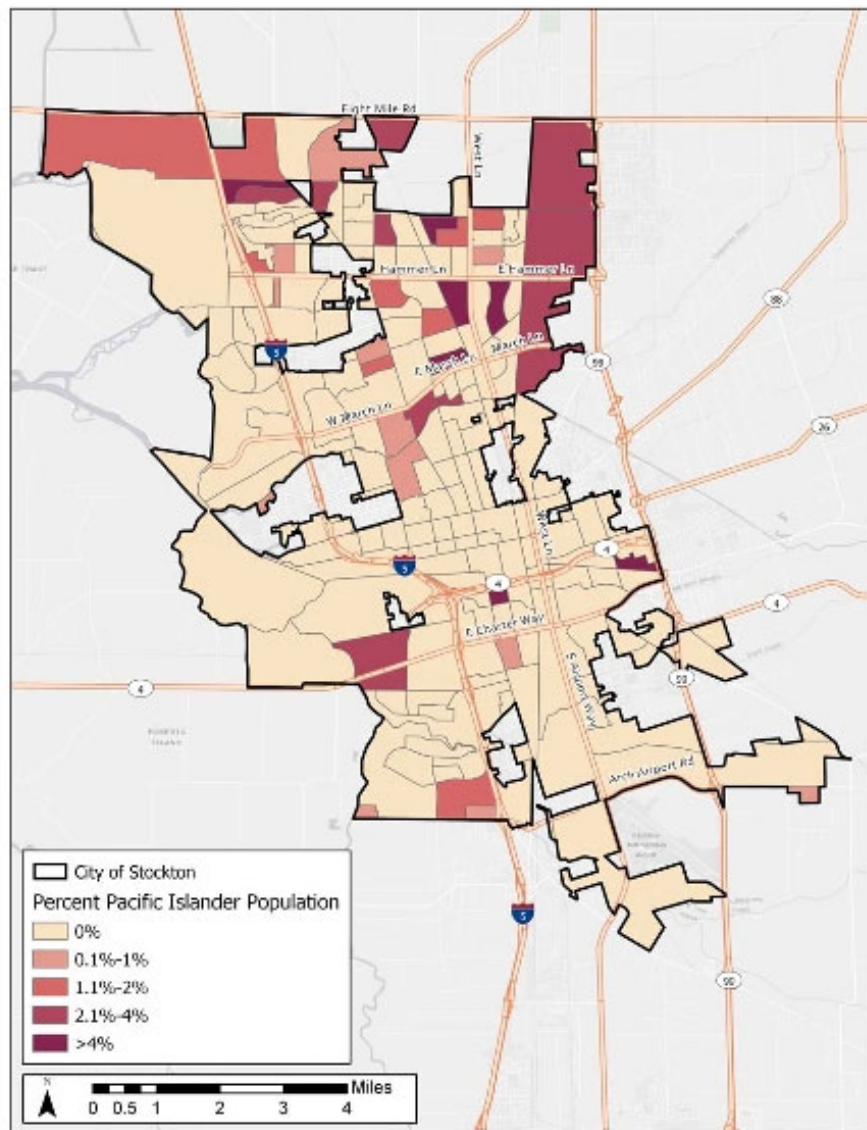
**Percent Hispanic or Latino Population**

- 20% above Citywide Average
- City of Stockton
- <25%
- 25%-40%
- 40.1%-55%
- 55.1%-70%
- >70%

0 0.5 1 2 3 4 Miles

13

**Figure 6: Percent Pacific Islander by Census Block Group, City of Stockton, 2013-2017**



Sources: City of Stockton, 2019; U.S. Census Bureau, TIGER, 2018, ACS 2017 5-year sampling period, B03002; BAE, 2019.

#### 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 that equal close to zero indicate that members of that minority group live in relatively integrated neighborhoods.<sup>3 4</sup>

The formula for calculating the isolation index for the City of Stockton, by Census Block Group, is as follows:  $I = \sum | P_{ig}/P_{it} * P_{jt}/P_t - P_{ij}/P_t | / 1 - P_{ij}/P_t$

- $P_{ig}$  is the population of group  $g$  in Census Block Group  $i$
- $P_{it}$  is the total population in Census Block Group  $i$
- $P_{jt}$  is the total population of group  $j$  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 the City of Stockton based on Block Group level data collected from the 2010 Decennial Census and the 2013-2017 ACS. According to this metric, the City of Stockton generally exhibits relatively low levels of racial and ethnic segregation. The isolation index values for the seven of the eight racial and ethnic groups were calculated to equal less than 0.5 during both time periods, indicating that most lived in fairly integrated neighborhoods. However, the isolation index for Hispanic or Latino residents increased from 0.49 to 0.53 between the two study periods, indicating that Hispanic and Latino residents are more than twice as likely to be geographically segregated than residents citywide. This coincides with the finding that there are significant concentrations of Hispanic and Latino residents in south Stockton and directly adjacent to the western border of the city, such that Hispanic and Latino residents account for a disproportionate share of the population of those Census Block Groups, as discussed previously.

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<sup>3</sup> HUD. (2013). *AFFH Data Documentation*. Available at: [http://www.huduser.org/portal/publications/pdf/FR-5173-P-01\\_AFFH\\_data\\_documentation.pdf](http://www.huduser.org/portal/publications/pdf/FR-5173-P-01_AFFH_data_documentation.pdf)

<sup>4</sup> 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, City of Stockton, 2010 and 2013-2017**

Racial and/or Ethnic Group	Isolation Index	
	2010	2013-2017
Non-Hispanic White	0.36	0.34
Black or African American alone	0.14	0.16
American Indian and Alaska Native alone	0.01	0.02
Asian alone	0.29	0.31
Native Hawaiian and Other Pacific Islander alone	0.01	0.04
Some other race alone	0.00	0.01
Two or more races	0.04	0.06
Hispanic or Latino	0.49	0.53

Sources: U.S. Census Bureau, 2010 Decennial Census, P8, ACS 2013-2017 5-year sampling period, B03002; BAE, 2019.

## 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 U.S. 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.

Between 2010 and 2017, household growth in the City of Stockton occurred at an average annual rate of 0.5 percent between 2010 and 2017, based on data shown in Table 6. This brought the total number of households in the City of Stockton from 90,375 in 2010 to 93,746 in 2017. Of the 3,371 new households, approximately 33 percent were families. Since 2010, the proportional share of family households decreased by a marginal 1.4 percentage points to 71.6 percent. As shown in the Table, this decrease is partially attributable to a roughly six percent decrease in the number of families with children under the age of 18. Consequently, the share of non-family households increased to 28.4 percent over the same time period. As a comparison, the number of households in San Joaquin County increased at a rate of 0.7 percent per year, resulting in the addition of around 10,903 new households. The available data suggest that the number of both family and non-family households grew at similar rates, resulting in a relatively stable distribution of households by type, countywide.

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. These communities also often require better access to schools, open space, and recreational opportunities for children. As shown in Table 6, below, the average household size in the City of Stockton increased somewhat, from 3.11 persons in 2010 to an estimated 3.18 in 2017, which is relatively consistent with the countywide average household size.

**Table 6: Household Characteristics, City of Stockton and San Joaquin County, 2006-2010 and 2013-2017**

	City of Stockton			
	2010		2017	
Household Type	Number	Percent	Number	Percent
Family Households	65,958	73.0%	67,080	71.6%
With Own Children Under 18	36,806	40.7%	34,436	36.7%
Non-Family Households	24,417	27.0%	26,666	28.4%
Single Person	19,285	21.3%	21,164	22.6%
<b>Total, All Households</b>	<b>90,375</b>	<b>100%</b>	<b>93,746</b>	<b>100%</b>
<b>Average Household Size</b>	<b>3.11</b>		<b>3.18</b>	

	San Joaquin County			
	2010		2017	
Household Type	Number	Percent	Number	Percent
Family Households	158,997	74.7%	166,555	74.4%
With Own Children Under 18	86,626	40.2%	83,556	37.3%
Non-Family Households	53,908	25.3%	57,253	25.6%
Single Person	42,394	19.9%	45,453	20.3%
<b>Total, All Households</b>	<b>212,905</b>	<b>100%</b>	<b>223,808</b>	<b>100%</b>
<b>Average Household Size</b>	<b>3.07</b>		<b>3.17</b>	

Sources: U.S. Census Bureau, ACS 2010 5-year and 2017 5-year sampling period, S1101, B11001; BAE, 2019.

### *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 residing in the City of Stockton increased, in nominal dollars, from \$47,946 in 2010 to \$48,396 in 2017. The median income in San Joaquin County also increased, in nominal terms, from \$54,341 in 2010 to \$57,813 in 2017. Once adjusted for inflation using the Bureau of Labor Statistics (BLS) California Consumer Price Index (CPI), the median income in both Stockton and San

Joaquin County decreased in real terms during this period. Specifically, the inflation-adjusted median annual income declined by an estimated \$7,132 in Stockton and by \$5,121 in San Joaquin County as a whole.

**Table 7: Household Income Distribution and Median Income Estimates, City of Stockton and San Joaquin County, 2006-2010 and 2013-2017**

Household Income	City of Stockton			
	2010		2017	
	Number	Percent	Number	Percent
Less than \$14,999	12,212	13.5%	14,188	15.1%
\$15,000 to \$24,999	10,268	11.4%	11,011	11.7%
\$25,000 to \$34,999	10,189	11.3%	10,143	10.8%
\$35,000 to \$49,999	14,227	15.7%	12,764	13.6%
\$50,000 to \$74,999	17,445	19.3%	16,930	18.1%
\$75,000 to \$99,999	10,669	11.8%	10,025	10.7%
\$100,000 to \$149,999	10,191	11.3%	11,243	12.0%
\$150,000 and above	5,174	5.7%	7,442	7.9%
<b>Total Households</b>	<b>90,375</b>	<b>100%</b>	<b>93,746</b>	<b>100%</b>
<b>Median Household Income</b>	<b>\$47,946</b>		<b>\$48,396</b>	
Inflation Adjusted (a)	\$55,528		\$48,396	

Household Income	San Joaquin County			
	2010		2017	
	Number	Percent	Number	Percent
Less than \$14,999	23,590	11.1%	25,441	11.4%
\$15,000 to \$24,999	21,885	10.3%	22,844	10.2%
\$25,000 to \$34,999	21,915	10.3%	20,963	9.4%
\$35,000 to \$49,999	31,032	14.6%	28,028	12.5%
\$50,000 to \$74,999	39,894	18.7%	40,801	18.2%
\$75,000 to \$99,999	27,695	13.0%	27,923	12.5%
\$100,000 to \$149,999	29,289	13.8%	33,278	14.9%
\$150,000 and above	17,605	8.3%	24,530	11.0%
<b>Total Households</b>	<b>212,905</b>	<b>100%</b>	<b>223,808</b>	<b>100%</b>
<b>Median Household Income</b>	<b>\$54,341</b>		<b>\$57,813</b>	
Inflation Adjusted (a)	\$62,934		\$57,813	

**Notes:**

(a) CHAS data reflect HUD-defined household income limits, for various household sizes, which are calculated for San Joaquin County.

(b) Figures may not sum to totals due to rounding.

Sources: U.S. Census Bureau, ACS 2010 5-year and 2017 5-year sampling period, B19001 and B19013; California Department of Industrial Relations, Consumer Price Index, 2018; BAE, 2019.

Table 8 reports the number of households residing in the City of Stockton and San Joaquin County by HUD-defined income category. For the purpose of this analysis, Extremely Low-Income households are assumed to earn incomes equal to or less than 30 percent of the HUD Adjusted Median Family Income (HAMFI). Very Low-Income households earn 30 to 50 percent of HAMFI, Low-Income households earn 50 to 80 percent of HAMFI, Moderate-Income households earn 80 to 120 percent of HAMFI, and Above Moderate-Income households earn greater than 120 percent HAMFI. According to these definitions, around 43,810 households (47.4 percent) were categorized as Extremely Low-, Very Low-, or Low-Income between 2011 and 2015. By comparison, there were 48,630 Moderate- and Above Moderate-Income

households (52.6 percent). Overall, lower income households are more likely to rent housing, while moderate and above moderate households are more likely to own their home.

**Table 8: Households by Income Category, City of Stockton and San Joaquin County, 2011-2015**

Income Category (a)	City of Stockton					
	Owner Households		Renter Households		All Households	
	Number	Percent	Number	Percent	Number	Percent
Extremely Low Income (30% of HAMFI or Less)	2,915	3.2%	12,180	13.2%	15,095	16.3%
Very Low Income (30% to 50% of HAMFI)	3,590	3.9%	10,100	10.9%	13,690	14.8%
Low Income (50% to 80% of HAMFI)	6,540	7.1%	8,485	9.2%	15,025	16.3%
Moderate Income (80% to 120% of HAMFI)	8,865	9.6%	7,870	8.5%	16,735	18.1%
Above Moderate Income (Above 120% of HAMFI)	23,405	25.3%	8,490	9.2%	31,895	34.5%
<b>All Income Levels (b)</b>	<b>45,310</b>	<b>49.0%</b>	<b>47,130</b>	<b>51.0%</b>	<b>92,440</b>	<b>100%</b>

Income Category (a)	San Joaquin County					
	Owner Households		Renter Households		All Households	
	Number	Percent	Number	Percent	Number	Percent
Extremely Low Income (30% of HAMFI or Less)	6,840	3.1%	19,390	8.9%	26,230	12.0%
Very Low Income (30% to 50% of HAMFI)	9,030	4.1%	17,995	8.2%	27,025	12.3%
Low Income (50% to 80% of HAMFI)	16,140	7.4%	18,420	8.4%	34,560	15.8%
Moderate Income (80% to 120% of HAMFI)	22,280	10.2%	17,270	7.9%	39,550	18.1%
Above Moderate Income (Above 120% of HAMFI)	69,800	31.9%	21,905	10.0%	91,705	41.9%
<b>All Income Levels (b)</b>	<b>124,085</b>	<b>56.6%</b>	<b>94,985</b>	<b>43.4%</b>	<b>219,075</b>	<b>100%</b>

Notes:

(a) CHAS data reflect HUD-defined household income limits, for various household sizes, which are calculated for San Joaquin County.

(b) Figures may not sum to totals due to rounding.

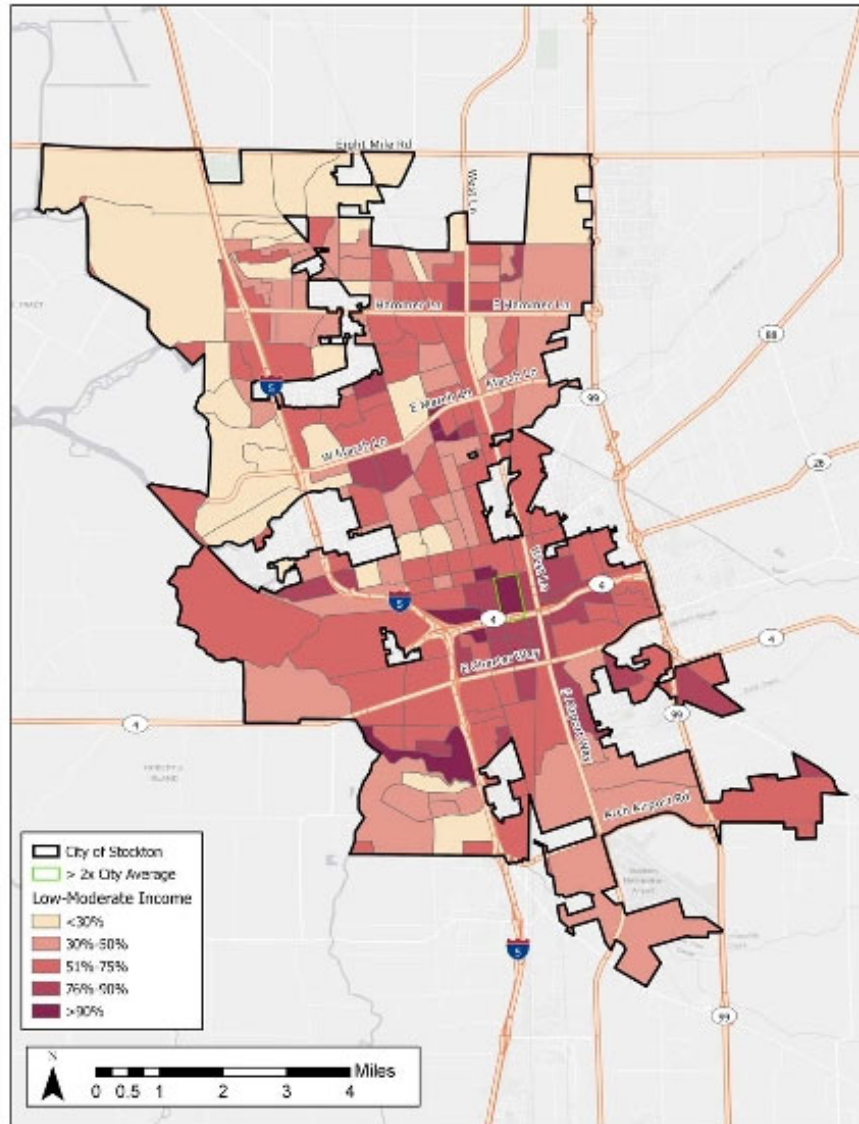
Sources: HUD, 2011-2015 CHAS, 2018; BAE, 2019.

#### ***Geographic Concentrations of Low- and Moderate-Income Households***

Figure 7, on the following page, identifies the Block Groups within the City of Stockton based on the proportion of low- and moderate-income households. 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. For the purpose of this analysis, a high concentration of low- and moderate-income households is any level higher than the citywide average of 48.9 percent. The figure identifies the Block Groups with concentrations that are more than twice the citywide average with a green outline. Based on these data, there is only one block group that fits the criteria, which is located in central Stockton north of Highway 4. As shown in the figure, most areas with high concentrations of low- and moderate-income households correspond with areas of high minority resident concentration, as discussed in a previous section, and renter households, as will be discussed in a later section.



**Figure 7: Low- and Moderate-Income Households by Census Block Group, 2013-2017**



Sources: City of Stockton, 2019; HUD, LMISD 2011-2015, 2019; BAE, 2019.



## 2.4 - Poverty Characteristics

According to the 2013-2017 ACS,<sup>5</sup> an average of 22.4 percent of the population in the City of Stockton lived below the poverty line, representing an average of approximately 66,939 impoverished residents. Table 9 reports the average poverty rate between 2013 and 2017 by race and ethnicity.<sup>6</sup> Note that the figures for each racial groups include persons of Hispanic or Latino descent, while figures for Hispanic or Latino residents include persons of all racial groups. According to these data, five out of the nine identified racial and ethnic groups have poverty rates that are above the citywide average for all residents. With a poverty rate of 35.2 percent, Black or African American individuals had the highest poverty rate. The remaining minority groups had poverty rates closer to the citywide average, with Native Hawaiian and Other Pacific Islander and Asians being the only minority groups with poverty rates below the citywide average. An evaluation of the distribution of persons in poverty by race and ethnicity indicates that White residents were underrepresented by approximately 6.5 percentage points. Black or African American residents, by comparison were overrepresented by around 6.6 percentage points, compared to their share of the population as a whole. Ethnically Hispanic or Latino residents were overrepresented by three percentage points, while the remaining minority groups with poverty rates above the citywide average were over represented by less than two percentage points.

### *Geographic Concentration of Poverty*

An additional evaluation of the relative geographic concentration of poverty by Block Groups throughout the City of Stockton identified a number of areas where the proportion of the population living below the poverty level exceeded 40 percent. 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."<sup>7</sup> Based on the Block Groups level data from the 2013-2017 ACS, an average of 41 to 65 percent of the population in the 26 Block Groups were living below the poverty line. This represents a total of more than 5,880 individuals. As illustrated in Figure 8, these block groups include downtown Stockton; parts of south Stockton along Highway 4, west of I-5, and east of South Airport Way; neighborhoods in north Stockton along March Lane and Hammer Lane as well as a few pockets in between these two streets. Two other isolated Block Groups where more than 40 percent of the population live below the poverty line include one Block Groups in east Stockton to the south of Highway 4 and I-99, and in west Stockton to the west of I-5 and south east of the unincorporated Country Club neighborhood. Only two of these

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<sup>5</sup> 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.

<sup>6</sup> 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*.

<sup>7</sup> 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](http://www.huduser.org/publications/pdf/FR-5173-P-01_AFFH_data_documentation.pdf)

Block Groups also had above average concentrations of minority residents (as shown in Figure 1). Both of these Block Groups are located in South Stockton.

**Table 9: Poverty by Race and Ethnicity, City of Stockton, 2013-2017**

	Below Poverty Line			Total Population		Share in Poverty Minus Share of Total Population
	Number	Poverty Rate	Share of Total Pop. in Poverty	Number	Percent	
<b>Hispanic or Latino by Race</b>						
White	24,892	19.1%	37.2%	130,571	43.7%	-6.5%
Black or African American	12,162	35.2%	18.2%	34,531	11.6%	6.6%
American Indian and Alaska Native	466	23.8%	0.7%	1,957	0.7%	0.0%
Asian	13,220	20.5%	19.7%	64,414	21.6%	-1.8%
Native Hawaiian and Other Pacific Islander	428	17.8%	0.6%	2,401	0.8%	-0.2%
Some other race alone	8,761	24.6%	13.1%	35,576	11.9%	1.2%
Two or more races	7,010	24.1%	10.5%	29,085	9.7%	0.7%
<b>Total, All Races</b>	<b>66,939</b>	<b>22.4%</b>	<b>100%</b>	<b>296,545</b>	<b>100%</b>	
Hispanic or Latino	30,540	24.0%	45.6%	127,193	42.6%	3.0%
Not Hispanic or Latino	36,399	21.2%	54.4%	171,352	57.4%	-3.0%
<b>Total, All Ethnicities</b>	<b>66,939</b>	<b>22.4%</b>	<b>100%</b>	<b>296,545</b>	<b>100%</b>	

Note:

(a) Includes only those residents for whom poverty status was determined.

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, S1701; BAE, 2019.

**City of Stockton**

**Above 40% Poverty**

**Households in Poverty**

- <15%
- 15%-25%
- 25.1%-45%
- >45%

**Miles**

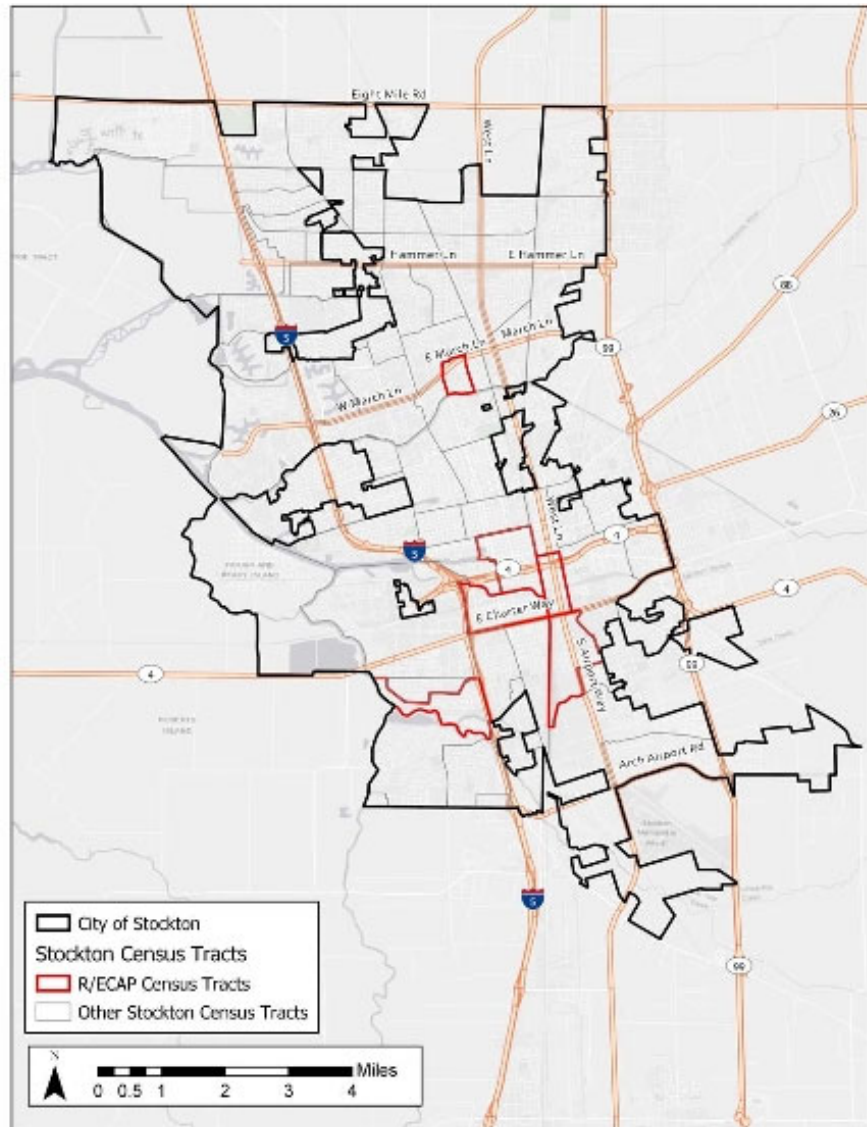
0 0.5 1 2 3 4

23

***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 a 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. Based on these criteria, six census tracts within the City of Stockton qualify as RCAP and ECAP areas which are shown in Figure 9. Four of these census tracts are located between the downtown and the Stockton Metropolitan airport, while another census tract is located in the northern part of the city generally between Bianchi and East Swain Road. The final R/ECAP census tract is located to the west of Interstate 5, south of Highway 4 and north of Walker Slough.

Figure 9: RCAP and ECAP Areas



Sources: City of Stockton, 2019; U.S. Census Bureau, ACS 2017 5-year sampling period, S1701; BAE, 2019.

## 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. 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.

According to the 2013-2017 ACS, approximately 19,047 households in the City of Stockton included a householder that was age 65 or over. This accounts for roughly 20.3 percent of all households in the city. Overall, the majority of elderly households (67.4 percent) owned their own home, while a minority (32.6 percent) rented their accommodations. In San Joaquin County as a whole, there were 47,300 households headed by persons age 65 or over, accounting for 21.1 percent of all households, countywide. The county as a whole has a slightly lower percentage of elderly renters, at 26.9 percent, and a higher percentage of elderly owners, at 73.1 percent.

**Table 10: Households by Age of Householder and Tenure, 2013-2017**

Age of householder	City of Stockton					
	Owner Households		Renter Households		All Households	
	Number	Percent	Number	Percent	Number	Percent
15 to 24 years	302	0.7%	3,881	7.9%	4,183	4.5%
25 to 34 years	4,963	11.1%	12,041	24.6%	17,004	18.1%
35 to 44 years	7,161	16.0%	10,282	21.0%	17,443	18.6%
45 to 54 years	9,348	20.8%	9,550	19.5%	18,898	20.2%
55 to 59 years	5,079	11.3%	3,917	8.0%	8,996	9.6%
60 to 64 years	5,157	11.5%	3,018	6.2%	8,175	8.7%
65 to 74 years	7,896	17.2%	3,464	7.1%	11,360	11.9%
75 to 84 years	3,399	7.6%	1,804	3.7%	5,203	5.6%
85 years and over	1,747	3.9%	937	1.9%	2,684	2.9%
<b>Total, All Households</b>	<b>44,852</b>	<b>100%</b>	<b>48,894</b>	<b>100%</b>	<b>93,746</b>	<b>100%</b>
<b>Age 65 and Over</b>	<b>12,842</b>	<b>28.6%</b>	<b>6,205</b>	<b>12.7%</b>	<b>19,047</b>	<b>20.3%</b>

Age of householder	San Joaquin County					
	Owner Households		Renter Households		All Households	
	Number	Percent	Number	Percent	Number	Percent
15 to 24 years	787	0.6%	6,739	6.8%	7,526	3.4%
25 to 34 years	12,110	9.7%	23,406	23.6%	35,516	15.9%
35 to 44 years	21,178	17.0%	22,564	22.8%	43,742	19.5%
45 to 54 years	27,471	22.0%	20,098	20.3%	47,569	21.3%
55 to 59 years	14,981	12.0%	7,317	7.4%	22,298	10.0%
60 to 64 years	13,632	10.9%	6,225	6.3%	19,857	8.9%
65 to 74 years	20,228	16.2%	7,024	7.1%	27,252	12.2%
75 to 84 years	9,941	8.0%	3,681	3.7%	13,622	6.1%
85 years and over	4,408	3.5%	2,020	2.0%	6,428	2.9%
<b>Total, All Households</b>	<b>124,734</b>	<b>100%</b>	<b>99,074</b>	<b>100%</b>	<b>223,808</b>	<b>100%</b>
<b>Age 65 and Over</b>	<b>34,575</b>	<b>27.7%</b>	<b>12,725</b>	<b>12.8%</b>	<b>47,300</b>	<b>21.1%</b>

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, B25007, BAE, 2019.

Additional data from the ACS shown in Table 11 indicate that there were around 34,441 individuals age 65 or over residing in the City of Stockton in 2017, representing 11.5 percent of the total population. Of these, 4,010 elderly individuals (around 11.6 percent) reported having incomes that were below the federal poverty level in 2017. The remaining 30,431 elderly individuals (88.4 percent) had incomes that were at, or above, the federal poverty level. Countywide, approximately 8,338 elderly individuals (9.9 percent) had incomes below the poverty level, while 75,606 elderly individuals (90.1 percent) had incomes at or above the federal poverty level in 2017.

As is illustrated in Table 12, an estimated average of 14,890 individuals age 65 and over were living in the City of Stockton with some type of disability, between 2013 and 2017. This accounts for around 43.2 percent of the total senior population. Of those seniors with some type of disability, 70.9 percent reported some degree of ambulatory difficulty, while 27.8 percent reported having difficulty providing self-care, and 53.3 percent reported having difficulty with independent living. A total of 34.6 percent reported some hearing difficulty, while 19.1 percent reported having difficulty with their vision and 31.2 percent reported having some cognitive difficulty. Data for San Joaquin County suggest a similar distribution overall.



Note that an individual can have more than one disability, meaning that the percentages reported above will sum to more than 100 percent.

**Table 11: Population by Age and Poverty Status, 2013-2017**

Age Category	City of Stockton					
	Below Poverty Level		At or Above Poverty Level		Total, All Persons	
	Number	Percent	Number	Percent	Number	Percent
Under 15 years	21,472	32.1%	48,922	21.1%	70,394	23.6%
15 to 24 years	12,017	18.0%	32,115	13.9%	44,132	14.8%
25 to 34 years	10,133	15.1%	34,799	15.0%	44,932	15.1%
35 to 44 years	7,060	10.5%	29,913	12.9%	36,973	12.4%
45 to 54 years	6,926	10.3%	28,696	12.4%	35,622	11.9%
55 to 64 years	5,321	7.9%	26,730	11.5%	32,051	10.7%
65 to 74 years	2,444	3.7%	16,403	7.8%	20,847	7.0%
75 years and over	1,566	2.3%	12,028	5.2%	13,594	4.6%
<b>Total, All Households</b>	<b>66,939</b>	<b>100%</b>	<b>231,606</b>	<b>100%</b>	<b>298,545</b>	<b>100%</b>
<b>Age 65 and Over (a)</b>	<b>4,010</b>	<b>11.6%</b>	<b>30,431</b>	<b>88.4%</b>	<b>34,441</b>	<b>11.5%</b>

Age Category	San Joaquin County					
	Below Poverty Level		At or Above Poverty Level		Total, All Persons	
	Number	Percent	Number	Percent	Number	Percent
Under 15 years	38,311	31.6%	124,989	21.2%	163,300	23.0%
15 to 24 years	20,826	17.2%	82,116	13.9%	102,944	14.5%
25 to 34 years	16,948	14.0%	80,628	13.7%	97,576	13.7%
35 to 44 years	14,548	12.0%	77,812	13.2%	92,360	13.0%
45 to 54 years	12,684	10.5%	78,717	13.4%	91,401	12.9%
55 to 64 years	9,639	7.9%	69,317	11.8%	78,956	11.1%
65 to 74 years	4,894	4.0%	45,021	7.6%	49,915	7.0%
75 years and over	3,444	2.8%	30,585	5.2%	34,029	4.8%
<b>Total, All Households</b>	<b>121,296</b>	<b>100%</b>	<b>589,185</b>	<b>100%</b>	<b>710,481</b>	<b>100%</b>
<b>Age 65 and Over (a)</b>	<b>8,338</b>	<b>6.9%</b>	<b>75,606</b>	<b>12.8%</b>	<b>83,944</b>	<b>11.8%</b>

Note:

(a) Percentage figure represents the percent of total persons age 65 and over.

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, B17001; BAE, 2019.

### 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 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.

According to data from the ACS, there was an average of 41,502 individuals in the City of Stockton with one or more disabilities between 2013 and 2017. There were approximately 3,173 residents under the age of 18 who reported having one or more disabilities. An estimated 23,299 disabled residents fell into the 18 to 64 age group. Of these, approximately 55.6 percent had ambulatory difficulty, 45.4 percent had cognitive difficulty, and 36.7 percent had difficulty with independent living.

**Table 12: Persons with Disabilities by Age and Disability Type, 2013-2017**

Age Range and Disability Type	City of Stockton		San Joaquin County	
	Number	Percent	Number	Percent
<b>Persons With One or More Disabilities, Ages 5-17</b>				
With a hearing difficulty	228	7.2%	765	11.1%
With a vision difficulty	433	13.6%	970	14.0%
With a cognitive difficulty	n.a.	n.a.	n.a.	n.a.
With an ambulatory difficulty	n.a.	n.a.	n.a.	n.a.
With a self-care difficulty	n.a.	n.a.	n.a.	n.a.
<b>Subtotal: Ages 5-17 (a)</b>	<b>3,173</b>	<b>n.a.</b>	<b>6,905</b>	<b>n.a.</b>
<b>Persons With One or More Disabilities, Ages 18-64</b>				
With a hearing difficulty	3,856	16.6%	8,516	17.9%
With a vision difficulty	5,031	21.6%	9,302	19.5%
With a cognitive difficulty	10,574	45.4%	20,626	43.3%
With an ambulatory difficulty	12,948	55.6%	24,951	52.4%
With a self-care difficulty	4,600	19.7%	9,279	19.5%
With an independent living difficulty	8,546	36.7%	17,630	37.0%
<b>Subtotal: Ages 18-64 (a)</b>	<b>23,299</b>	<b>n.a.</b>	<b>47,667</b>	<b>n.a.</b>
<b>Persons With One or More Disabilities, Age 65+</b>				
With a hearing difficulty	5,156	34.6%	13,260	39.2%
With a vision difficulty	2,638	19.1%	6,192	18.3%
With a cognitive difficulty	4,652	31.2%	9,378	27.7%
With an ambulatory difficulty	10,561	70.9%	23,081	68.2%
With a self-care difficulty	4,144	27.8%	8,654	25.6%
With an independent living difficulty	7,935	53.3%	16,569	49.0%
<b>Subtotal: Ages 65 and over (a)</b>	<b>14,890</b>	<b>n.a.</b>	<b>33,817</b>	<b>n.a.</b>
<b>Total, All Ages (a)(b)</b>	<b>41,502</b>		<b>88,704</b>	

Notes:

(a) Totals may be less than sum of list of disabilities since a person may have more than one disability.

(b) Figures may not sum to totals due to rounding.

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, S1810; BAE, 2019.

### 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, 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, four, or five 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 results in 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.

According to the data presented in Table 13, approximately 22.6 percent of all households in the City of Stockton included only a single individual, while the majority, at 58.2 percent were smaller, multi-person households with between two and four members. The data indicate that there were more than 17,980 large households, as defined above, which accounted for 19.1 percent of all households in the city. Almost all of these large households were family households, as defined by the Census Bureau.

**Table 13: Family and Non-Family Households by Size, 2013-2017**

Household Type	City of Stockton		San Joaquin County	
	Number	Percent	Number	Percent
Single Person Households	21,164	22.6%	45,453	20.3%
Small Multi-Person Households (a)	54,593	58.2%	136,395	60.9%
Family	49,152	52.4%	124,788	55.8%
Non-Family	5,441	5.8%	11,607	5.2%
Large Multi-Person Households (b)	17,989	19.2%	41,960	18.7%
Family	17,928	19.1%	41,767	18.7%
Non-Family	61	0.1%	193	0.1%
<b>Total, All Households</b>	<b>93,746</b>	<b>100%</b>	<b>223,808</b>	<b>100%</b>

Notes:

(a) Small multi-person households include households with two to four persons.

(b) Large multi-person households include households with five or more persons.

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, B11016; BAE, 2019.

Compared to the distribution of housing units by size, discussed in greater detail on the Housing Profile section, there appears to be a generally sufficient supply of housing units to accommodate the City's larger households, with some caveats. For example, housing units with three or more bedrooms accounted for example, housing units with three or more bedrooms accounted for more than 65 percent of the total housing stock between 2013 and 2017, representing approximately 58,920 housing units (see Table 18). This included 38,590 owner-occupied units (41.2 percent), and 20,336 renter-occupied units (21.7 percent). While this indicates that there is a sufficient stock of housing to accommodate the City's 17,989 large households. However, because larger housing units tend to be owner-occupied single-family structures, larger renter households are more likely to have difficulty finding housing.

Additionally, there are other factors that can make it difficult for large households to secure housing, such as restrictions under some housing programs that stipulate that a child cannot occupy the same bedroom as an adult.<sup>8</sup>

#### ***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.

Table 14 reports the total population in the City of Stockton and San Joaquin County by primary language spoken and identifies the proportion of LEP households in each jurisdiction. Based on these data, the primary language spoke at home for 53 percent of Stockton Resident between 2013 and 2017 was English. An estimated 47 percent of residents spoke another language when at home. This represents around 131,427 individuals. The most prevalent language spoken at home other than English was Spanish, followed by Asian and Pacific Island languages. The table also reports the percent of households where non one age 14 or over spoke English “very well”. These data indicate that approximately 26 percent of households where Asian or Pacific Island languages were spoken had limited English proficiency. This was relatively similar to Spanish speaking households where 22 percent had limited English proficiency, and 24.1 percent of households that spoke other languages not previously identified. While very little attribute data are available regarding LEP households, the information available from the 2013-2017 AVC indicate that households who spoke a language other than English were just as likely to be in poverty as English-speaking households in Stockton, but were significantly less likely to have completed high school. While 12.7 percent of English-speaking households had not graduated from high school, 37.8 percent of non-English speaking households had not graduated from high school.

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<sup>8</sup> Meaning, for example, that a two-person single-parent household would need to secure a two-bedroom unit.

**Table 14: Population by Language Spoken at Home and Percent of Households with Limited English Proficiency, City of Stockton and San Joaquin County, 2013-2017**

Language Spoken	City of Stockton			
	Population by Primary Language Spoken (a)		Population with Limited English Proficiency (b)	Households with Limited English Proficiency (c)
	Number	Percent		
Spanish	77,560	27.6%	40.9%	22.1%
Other Indo-European languages	10,791	3.8%	40.1%	16.0%
Asian and Pacific Island languages	41,092	14.6%	52.8%	26.1%
Other languages	1,984	0.7%	27.8%	24.1%
<b>Total, All Non-English</b>	<b>131,427</b>	<b>46.8%</b>	<b>44.30%</b>	<b>n.a.</b>
<b>English Only</b>	<b>149,549</b>	<b>53.2%</b>	<b>n.a.</b>	<b>n.a.</b>
<b>Total, All Languages</b>	<b>280,976</b>	<b>100%</b>	<b>20.7%</b>	<b>10.9%</b>

Language Spoken	San Joaquin County			
	Population by Primary Language Spoken (a)		Population with Limited English Proficiency (b)	Households with Limited English Proficiency (c)
	Number	Percent		
Spanish or Spanish Creole	178,672	26.6%	41.1%	20.9%
Other Indo-European languages	34,283	5.1%	40.3%	14.2%
Asian and Pacific Island languages	59,819	8.9%	48.3%	22.5%
Other languages	4,188	0.6%	22.7%	15.9%
<b>Total, All Non-English</b>	<b>276,962</b>	<b>41.2%</b>	<b>42.30%</b>	<b>n.a.</b>
<b>English Only</b>	<b>394,635</b>	<b>58.8%</b>	<b>n.a.</b>	<b>n.a.</b>
<b>Total, All Languages</b>	<b>671,597</b>	<b>100%</b>	<b>17.4%</b>	<b>8.5%</b>

**Notes:**

(a) Represents the population age five years and over by the primary language spoken at home.

(b) Percent of population age five years and over who does not speak English or speaks English less than "very well."

(c) Percent of households where no one age 14 and over speaks English only, or speaks English "very well."

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, S1601, S1602; BAE, 2019.

### ***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 to 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 citizenship status. With these combined challenges, the farmworking community oftentimes does not have enough capital to afford housing that meets their needs and thus must resort to the lowest cost and substandard housing. 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 contains 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 camps, 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, the neighborhood of 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 farmland. While the City of Stockton continues to support countywide efforts to provide farmworker housing, the majority of City policies are geared toward supporting the provision of affordable housing, both single- and multifamily, for all households, including farmworkers, as well as other populations.

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

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

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

Sources: U.S. Census of Agriculture, 2017; BAE, 2019.

#### ***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 degree of housing discrimination that occurs regarding this population, the available statistics from the California Department of Public Health's 2017 HIV Surveillance Report indicate that there were approximately 135,000 persons living in California living with diagnosed HIV infection in 2017, which is an 8.7 percent increase from about 124,235 in 2013. San Joaquin County faced a higher 11.9 percent increase during the same time frame, increasing from 1,201 persons in 2013 to 1,344 persons living with diagnosed HIV infection in 2017. While the percent increase is higher than throughout California as a whole, San Joaquin County's growth in the HIV-diagnosed population seems to have leveled off, whereas

the population diagnosed with HIV steadily increased statewide. For example, since 2014 the number of residents living with HIV remained at around 1,300 people countywide, whereas California's HIV-diagnosed population has been steadily increasing.

#### ***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. The majority of the homeless population is typically comprised of single adults, 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 below, identifies the estimated number of unsheltered and sheltered homeless individuals and families located within the City of Stockton. An authorized Continuum of Care (CoC) representative provided the data, collected through the 2019 Point-in-Time Count (PITC). Consultation with Central Valley Low-Income Housing (CVLIHC) indicated that the observed increase in the number of unsheltered homeless residing in Stockton can be attributed to improvements in the survey method and increased outreach, though actual increases in the size of the unsheltered homeless population cannot be ruled out.

According to these data, there were 922 unsheltered homeless individuals identified in Stockton, as well as 659 individuals residing in emergency shelters and 173 persons living in transitional housing facilities. Overall the data indicate that homeless individuals in Stockton are primarily White and African American. For example, White individuals account for an estimated 51.6 percent of the unsheltered population, 45.7 percent of those in emergency shelters, and 61.3 percent of those residing in transitional housing. African American individuals, as the second largest racial cohort, account for an estimated 27.0 percent of the unsheltered count, 40.2 percent of the emergency shelter population, and 30.1 percent of transitional housing residents. On an ethnic basis, non-Hispanic and Latino individuals account for the majority of the homeless population, regardless of shelter status, though Hispanic individuals still account for an estimated 26.6 percent of the unsheltered population, 30.7 percent of the emergency shelter population, and 19.7 percent of the population living in transitional housing.

**Table 16: Sheltered and Unsheltered Homeless by Population Type, 2019**

Age Group	Unsheltered		Sheltered			
			Emergency		Transitional	
	Number	Percent	Number	Percent	Number	Percent
Adults	799	86.7%	435	66.0%	118	68.2%
Children	4	0.4%	224	34.0%	55	31.8%
Unknown	119	12.9%	0	0.0%	0	0.0%
<b>Total, All</b>	<b>922</b>	<b>100.0%</b>	<b>659</b>	<b>100.0%</b>	<b>173</b>	<b>100.0%</b>
<b>Racial Group</b>						
American Indian	11	1.2%	7	1.1%	0	0.0%
Asian	25	2.7%	18	2.7%	4	2.3%
African American	249	27.0%	265	40.2%	52	30.1%
Pacific Islander	9	1.0%	16	2.4%	4	2.3%
White	476	51.6%	301	45.7%	106	61.3%
Multi-Racial	13	1.4%	45	6.8%	4	2.3%
Unknown	139	15.1%	7	1.1%	3	1.7%
<b>Total, All Racial Groups</b>	<b>922</b>	<b>100.0%</b>	<b>659</b>	<b>100.0%</b>	<b>173</b>	<b>100.0%</b>
<b>Ethnic Group</b>						
Non-Hispanic/Latino	488	52.9%	449	68.1%	133	76.9%
Hispanic/Latino	245	26.6%	202	30.7%	34	19.7%
Unknown	189	20.5%	8	1.2%	6	3.5%
<b>Total, All Ethnic Groups</b>	<b>922</b>	<b>100.0%</b>	<b>659</b>	<b>100.0%</b>	<b>173</b>	<b>100.0%</b>

Sources: Stockton/San Joaquin County Continuum of Care, Point-In-Time Count, 2019; BAE, 2019

## 2.4 – 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 or 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 a total of approximately 101,764 housing units located within the City of Stockton in 2017. Of these, 72.7 percent were single-family structures, including both attached and detached units, and 26.2 percent were multifamily units. The majority of the multifamily units were larger with five or more units, though multifamily units of all sizes have decreased comparably since 2010. Multifamily units in San Joaquin County appear to follow similar trends, though the County has a much smaller share of multifamily units in its overall housing mix at 18.2 percent in 2017. The remaining 2.1 percent of Stockton's housing stock are units that include mobile homes and other non-traditional residences, such as boats, RVs, and vans. As illustrated in Figure 10, the majority of the city's multifamily housing stock is concentrated in the downtown and March Lane corridor. While these areas generally correspond to areas of low and moderate income and minority

households, the lack of multifamily rental housing options in southern Stockton may present barriers to fair housing choice for some households.

**Table 17: Housing Stock Characteristics, 2006-2010 and 2013-2017**

Units in Structure	City of Stockton			
	2010		2017	
	Number	Percent	Number	Percent
Detached Single Family	64,318	64.7%	66,827	65.7%
Attached Single Family	7,040	7.1%	7,082	7.0%
2 to 4 units	9,048	9.1%	8,787	8.6%
5 or more units	17,867	18.0%	17,885	17.6%
Mobile Homes	1,028	1.0%	1,117	1.1%
Boats, RV's, Vans, Other	77	0.1%	66	0.1%
<b>Total, All Housing Units</b>	<b>99,376</b>	<b>100%</b>	<b>101,764</b>	<b>100%</b>

Units in Structure	San Joaquin County			
	2010		2017	
	Number	Percent	Number	Percent
Detached Single Family	167,175	72.3%	175,178	73.2%
Attached Single Family	12,137	5.3%	11,794	4.9%
2 to 4 units	14,746	6.4%	14,733	6.2%
5 or more units	28,545	12.4%	28,665	12.0%
Mobile Homes	8,122	3.5%	8,535	3.6%
Boats, RV's, Vans, Other	389	0.2%	348	0.1%
<b>Total, All Housing Units</b>	<b>231,114</b>	<b>100%</b>	<b>239,253</b>	<b>100%</b>

Sources: U.S. Census Bureau, ACS 2010 5-year and 2017 5-year sampling period, B25024; BAE, 2019.

Table 18 reports the number of occupied housing units in the City of Stockton and San Joaquin County by size and tenure. According to these data, two- and three-bedroom units account for around 60 percent of Stockton's total housing stock. One-bedroom units, which represent an important affordable housing option, account for 10 percent of the city's housing stock, while studio units account for three percent. Larger housing units with four or more bedrooms account for a little more than one quarter of the total housing stock. In terms of household tenure, owner occupied units are clearly skewed towards the three- and four-bedroom range, while renter occupied units are skewed towards the two- and three-bedroom range. This indicates that smaller owner and renter households requiring studio's and one-bedroom units likely lack housing options which may present a barrier to fair housing choice. As a result, smaller, lower-income households likely reside within housing units that are larger than would otherwise be necessary to meet their needs, which is a contributing factor in the high prevalence of excessive housing costs among lower income households, which is discussed later. 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 constitutes the majority of the citywide housing stock. This may, in some cases, contribute to incidences of overcrowding, which has been identified as one of the more prevalent housing problems experienced by lower income households.



**Table 18: Housing Units by Size and Tenure, 2013-2017**

Occupied Housing Units by Bedrooms	City of Stockton				San Joaquin County			
	2010		2017		2010		2017	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
<b>Owner Occupied</b>								
No Bedroom	143	0.2%	232	0.2%	438	0.2%	557	0.2%
1 Bedroom	456	0.5%	383	0.4%	1,852	0.9%	1,807	0.7%
2 Bedroom	7,104	7.9%	5,647	6.0%	18,798	8.8%	15,948	7.1%
3 Bedroom	23,716	26.2%	21,460	22.9%	64,406	30.3%	59,976	26.8%
4 Bedroom	14,113	15.6%	13,346	14.2%	36,120	17.0%	35,956	16.1%
5 Bedroom or More	3,508	3.9%	3,784	4.0%	9,743	4.6%	10,690	4.8%
<b>Subtotal, Owner Occupied</b>	<b>49,038</b>	<b>54.3%</b>	<b>44,852</b>	<b>47.8%</b>	<b>131,357</b>	<b>61.7%</b>	<b>124,734</b>	<b>55.7%</b>
<b>Renter Occupied</b>								
No Bedroom	1,604	1.8%	2,552	2.7%	2,557	1.2%	4,054	1.8%
1 Bedroom	9,437	10.4%	8,782	9.4%	15,714	7.4%	15,147	6.8%
2 Bedroom	15,534	17.2%	17,224	18.4%	31,910	15.0%	34,816	15.6%
3 Bedroom	10,695	11.8%	14,298	15.3%	23,044	10.8%	31,684	14.2%
4 Bedroom	3,500	3.9%	5,079	5.4%	6,509	3.2%	11,207	5.0%
5 Bedroom or More	567	0.6%	959	1.0%	1,414	0.7%	2,166	1.0%
<b>Subtotal, Renter Occupied</b>	<b>41,337</b>	<b>45.7%</b>	<b>48,894</b>	<b>52.2%</b>	<b>81,548</b>	<b>38.3%</b>	<b>99,074</b>	<b>44.3%</b>
<b>Total, All Households</b>	<b>90,375</b>	<b>100%</b>	<b>93,746</b>	<b>100%</b>	<b>212,905</b>	<b>100%</b>	<b>223,808</b>	<b>100%</b>

Sources: U.S. Census Bureau, ACS 2010 5-year and 2017 5-year sampling period, B25042; BAE, 2019.

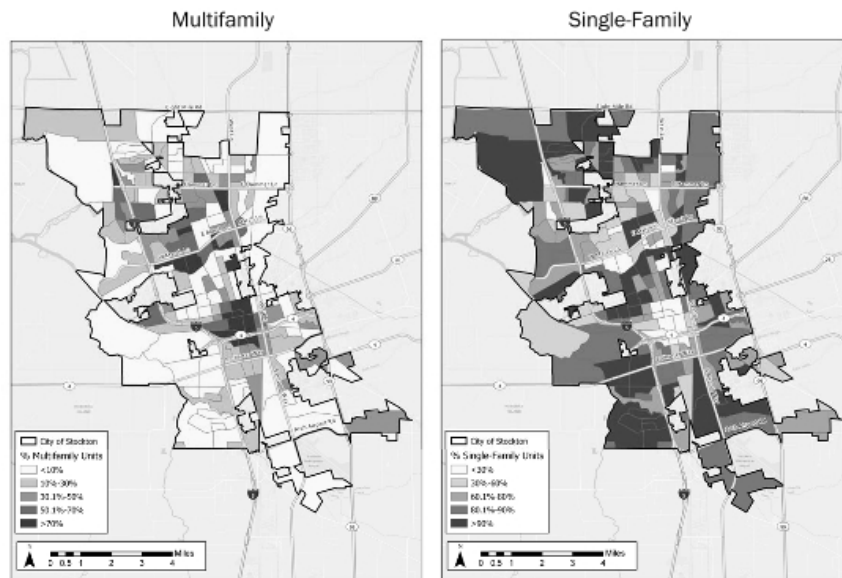
Table 19 reports the number of housing units by year built. The data indicate that the majority of Stockton's housing stock, about 63.4 percent of units, were built between 1970 and 2009. This is similar to the distribution at the regional level in San Joaquin County, though San Joaquin County units are slightly younger with 21.7 percent of units built 2000 or later compared to 18.1 percent in the City of Stockton. Though units built before 1969 account for nearly 35 percent of the city's housing stock, units built in any particular decade within this timeframe consistently account for less than ten percent of the total housing stock.

**Table 19: Housing Units by Year Built, 2013-2017**

Year Built	City of Stockton		San Joaquin County	
	Number	Percent	Number	Percent
1939 or earlier	8,877	8.7%	17,355	7.3%
1940 to 1949	7,635	7.5%	15,301	6.4%
1950 to 1959	9,473	9.3%	25,158	10.5%
1960 to 1969	10,067	9.9%	22,597	9.4%
1970 to 1979	20,168	19.8%	38,164	16.0%
1980 to 1989	14,692	14.4%	36,356	15.2%
1990 to 1999	12,471	12.3%	32,488	13.6%
2000 to 2009	17,238	16.9%	46,206	19.3%
2010 to 2013	1,018	1.0%	4,071	1.7%
2014 or later	125	0.1%	1,557	0.7%
<b>Total, All Years</b>	<b>101,764</b>	<b>100%</b>	<b>239,253</b>	<b>100%</b>

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, B25034; BAE, 2019.

**Figure 10: Percent of Housing Units by Type, City of Stockton, 2013-2017**



Sources: U.S. Census Bureau, ACS 2010 5-year and 2017 5-year sampling period, B25024; BAE, 2019.

### ***Lead-Based Paint Hazards***

Lead-based paints were banned from use in 1978. As a result, all units constructed prior to 1980 could pose a potential lead-based paint hazard. As shown in Table 19 above, approximately 56,220 housing units, or 55 percent of the city's housing stock, were constructed prior to 1980. Though not shown in the table, approximately 30,443 of the housing units constructed prior to 1980 are renter occupied. 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, household 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 11.9 percent of the city's housing stock was constructed prior to 1980 and was occupied by households that included children. Renter occupied housing units are more likely to have been constructed prior to 1980 and contain children and are also more likely to have lower income households due to the lower costs associated with older, less well-maintained housing units.

**Table 20: Risk of Lead Based Paints by Income Category**

<b>Housing Units built before 1980 with children present</b>	<b>Owner-Occupied</b>		<b>Renter-Occupied</b>		<b>Total</b>	
	Number	Percent	Number	Percent	Number	Percent
Extremely Low Income (30% of HAMFI or Less)	235	0.5%	2,565	5.4%	2,800	3.0%
Very Low Income (30% to 50% of HAMFI)	245	0.5%	2,100	4.5%	2,345	2.5%
Low Income (50% to 80% of HAMFI)	575	1.3%	1,430	3.0%	2,005	2.2%
Moderate Income (80% to 100% of HAMFI)	400	0.9%	745	1.6%	1,145	1.2%
Above Moderate Income (Above 100% of HAMFI)	1,565	3.5%	1,135	2.4%	2,700	2.9%
<b>All Income Levels</b>	<b>3,020</b>	<b>6.7%</b>	<b>7,975</b>	<b>16.9%</b>	<b>10,995</b>	<b>11.9%</b>
All Housing Units	45,310		47,130		92,440	

Sources: 2011-2015 CHAS; BAE, 2019.

### Household Tenure

Table 21 reports the number of occupied housing units by tenure in Stockton and San Joaquin County. According to these data, the majority of housing units in Stockton were owner-occupied in 2010 at 54.3 percent. However, the owner-occupied housing stock decreased to 47.8 percent as of 2017, indicating that owner households are becoming less prevalent in the City of Stockton. By comparison, renter-occupied housing units accounted for 45.7 percent of the occupied housing stock in 2010, increasing to 52.2 percent as of 2017. While the countywide proportion of owner-occupied housing units also declined during this period, the current share is roughly eight percentage points higher than in Stockton.

Additional data reported in Figure 11 illustrate the relative geographic concentrations of owner-occupied and renter-occupied housing throughout the City of Stockton. The data indicate clear concentrations of renter households in Stockton's downtown area, as well as areas scattered throughout northern Stockton. Note that the two slivers of high concentration renter households in southern Stockton are misleading because these areas are mostly unpopulated. As noted previously areas with high concentrations of renter households also coincide with above average concentrations of low- and moderate-income households and concentrations of minority residents. Higher income areas in Stockton typically feature fewer renter households, which often occupy single-family units.

**Table 21: Occupied Housing Units by Tenure, 2006-2010 and 2013-2017**

Tenure	City of Stockton			
	2010		2017	
	Number	Percent	Number	Percent
Owner Occupied	49,038	54.3%	44,852	47.8%
Renter Occupied	41,337	45.7%	48,894	52.2%
Total, All Households	90,375	100%	93,746	100%

Tenure	San Joaquin County			
	2010		2017	
	Number	Percent	Number	Percent
Owner Occupied	131,357	61.7%	124,734	55.7%
Renter Occupied	81,548	38.3%	99,074	44.3%
Total, All Households	212,905	100%	223,808	100%

Sources: U.S. Census Bureau, ACS 2010 5-year and 2017 5-year sampling period, B25003; BAE, 2019.

**Figure 11: Percent of Occupied Housing Units by Tenure, City of Stockton, 2013-2017**



Sources: City of Stockton, 2019; U.S. Census Bureau, ACS 2017 5-year sampling period, B25003; BAE, 2019.

### Occupancy/Vacancy Status

Table 22 reports the occupancy and vacancy rates for housing units located in Stockton and San Joaquin County in both 2010 and 2017. According to these data, the residential vacancy rates in both areas decreased modestly during this period. In the year 2010, there were an estimated 9,001 vacant housing units in Stockton, which represented around 9.1 percent of the housing stock. As of 2017, ACS estimates indicate that there were 8,018 vacant housing units, which represented approximately 7.9 percent of the total housing stock. During this time period, the total housing stock also expanded by an estimated 2,388 units. San Joaquin County experienced similar trends, with a total vacancy rate of 7.9 percent in 2010, which declined to 6.5 percent as of 2017. These vacancy rates remain somewhat above what is typically considered normal (i.e., five to six percent) and provide valuable opportunities for improved access and affordability.

**Table 22: Occupancy and Vacancy Status, 2006-2010 and 2013-2017**

Occupancy Status	City of Stockton			
	2010		2017	
	Number	Percent	Number	Percent
Occupied Housing Units	90,375	90.9%	93,746	92.1%
Vacant Housing Units	9,001	9.1%	8,018	7.9%
For rent	3,155	3.2%	3,150	3.1%
For sale only	1,625	1.6%	594	0.6%
Rented or sold, not occupied	1,099	1.1%	795	0.8%
For seasonal or occasional use	329	0.3%	550	0.5%
For migrant workers	29	0.0%	0	0.0%
Other vacant (a)	2,764	2.8%	2,929	2.9%
<b>Total, All Housing Units</b>	<b>99,376</b>	<b>100%</b>	<b>101,764</b>	<b>100%</b>

Occupancy Status	San Joaquin County			
	2010		2017	
	Number	Percent	Number	Percent
Occupied Housing Units	212,905	92.1%	223,808	93.5%
Vacant Housing Units	18,209	7.9%	15,445	6.5%
For rent	4,794	2.1%	4,715	2.0%
For sale only	4,071	1.8%	1,195	0.5%
Rented or sold, not occupied	2,324	1.0%	2,563	1.1%
For seasonal or occasional use	1,226	0.5%	1,356	0.6%
For migrant workers	106	0.0%	66	0.0%
Other vacant (a)	5,688	2.5%	5,550	2.3%
<b>Total, All Housing Units</b>	<b>231,114</b>	<b>100%</b>	<b>239,253</b>	<b>100%</b>

Note:

(a) 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: California Association of Realtors, 2019; BAE, 2019.

### Housing Prices

Between 1998 and 2009, the City of Stockton and surrounding areas 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 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 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, Stockton 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 January 2000 to September 2013. Note that CAR does not report data for the period from September 2007 to January 2009 for San Joaquin County.

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 \$365,000 in December of 2018, representing an increase of than \$205,000, or 128 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 CoreLogic, a private data vendor, indicate that the median single-family sales price in Stockton, between October and December of 2018, was approximately \$285,000, including both new and resale units. Based on standard industry loan terms, the purchase of a median-priced unit would require an annual household income of approximately \$82,986. This assumes that all housing costs would not exceed 30 percent of income, a down payment value of 3.5 percent of the purchase price, an annual interest rate of 4.5 percent, a 30 year loan term, an upfront mortgage insurance rate of 1.75 percent of purchase price and an annual rate of 1.35 percent of purchase price, a property tax rate of 1.18 percent of purchase price, and an annual hazard insurance rate of 0.34 percent of purchase price. Compared to the existing distribution of households by income, as reported by the 2013-2017 ACS, the median priced for-sale unit would likely be unaffordable to at least 71 percent of households within the City of Stockton.

**Figure 12: Median Single-Family Sales Price Trends, Jan. 2010 to Dec. 2018**



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

**Table 23: Median Sales Price by Unit Size and Associated Income Requirements (a)**

Unit Size	# of Sales	Median Price	Home Ownership Cost Assumptions (b)						Income Requirement
			Downpayment/ Upfront Insurance	Principal and Interest	Mortgage Insurance	Property Taxes	Property Insurance	Monthly Payment	
1 Bedroom	10	\$154,500	\$8,111	\$755	\$174	\$152	\$44	\$1,125	\$44,987
2 Bedroom	149	\$225,000	\$11,813	\$1,100	\$253	\$221	\$64	\$1,638	\$65,515
3 Bedroom	341	\$283,500	\$14,884	\$1,386	\$319	\$278	\$80	\$2,064	\$82,549
4 Bedroom	165	\$339,000	\$17,798	\$1,858	\$381	\$333	\$96	\$2,468	\$98,709
5+ Bedroom	64	\$382,500	\$20,081	\$1,870	\$430	\$375	\$108	\$2,784	\$111,376
All Sizes	729	\$285,000	\$14,963	\$1,394	\$321	\$280	\$81	\$2,075	\$82,986

Notes:

(a) Includes single family residence, duplex, triplex, quadruplex, and townhouse properties with last market sales dates between October 1, 2018 and December 31, 2018.

(b) Home ownership cost assumptions include:

% of income for housing: 30%  
 Downpayment 3.50%  
 Annual interest rate 4.50%  
 Loan Term 30 years  
 Upfront mortgage insurance 1.75%  
 Annual mortgage insurance 1.35%  
 Annual property tax 1.18%  
 Annual hazard insurance (c) 0.34%

(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 \$300,000.

Sources: ListSource, 2018; City of Stockton, 2019; California Department of Insurance, 2018; BAE, 2019.



### Rents

The private data vendor, CoStar, reports that the average rental rate for all multifamily units in the City of Stockton was \$1,065 as of the fourth quarter of 2018. This is \$109 more than the average rental rate in the fourth quarter of 2016 and represents an 11.4 percent increase. As shown in Table 24, one- and two-bedroom units account for the majority of the city's multifamily housing stock. Studio's and one-bedroom units are the most affordable unit types, with average rental rates of \$943 and \$936, respectively. Larger two- and three-bedroom units are the most expensive unit types, renting for an average of \$1,192 and \$1,175, respectively. With a vacancy rate of 3.6 percent, Stockton's multifamily rental market is relatively tight.

Based on the 2018 utility allowance schedule published by the Housing Authority of the County of San Joaquin (HACSJ) and the average rent data discussed above, Table 24 identifies the income that would be required in order to afford an average-priced rental housing unit, assuming no more than 30 percent of household income is spent on rent and utilities. The required income necessary to afford a one-bedroom unit, which is the most prevalent unit size in the City of Stockton according to CoStar, is \$40,360. Though not a perfect comparison, 2017 ACS data indicate that there are approximately 39,859 households that earn less than \$40,000 annually. These households represent about 42.5 percent of all households within the city. Therefore, it can be inferred that more than two-fifths of households within Stockton would likely struggle to reasonably afford the average-priced one-bedroom apartment unit.

**Table 24: Rental Market Overview, Q4 2018**

Unit Size	Total Units	Average Square Footage	Average Rent	Average Rent per Square Foot	Utility Allowance	Required Income
Studio	924	496	\$943	\$2.01	\$52	\$39,800
1 Bedroom	7,513	624	\$936	\$1.52	\$73	\$40,360
2 Bedroom	6,693	922	\$1,192	\$1.29	\$89	\$51,240
3 Bedroom	1,036	1,220	\$1,175	\$0.96	\$109	\$51,360
4 or more Bedroom	94	1,451	\$881	\$0.66	\$145	\$45,040
<b>Total, All Units</b>	<b>17,131</b>	<b>779</b>	<b>\$1,065</b>	<b>\$1.35</b>	<b>\$76</b>	<b>\$45,647</b>

Sources: CoStar, 2019; San Joaquin Housing Authority, 2018; BAE, 2019.

### 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 26, in the following subsection, presents a breakdown of the prevalence of housing problems, including overpayment, among households with income equal to, or less than, the area median. According to these data, an average of 42 percent of renter occupied households with incomes up to the median, and 18 percent of owner-occupied households with incomes up to the median overpaid for housing. Approximately one quarter of Stockton's renter households with incomes up to the median were severely cost burdened, while 10

percent of Stockton's owner households with incomes up to the median were severely cost burdened. Based on detailed data reported in Table 25, 70 percent of lower income households (i.e., 50 percent or less of AMI) that overpaid for housing were renters. Small family renter households were generally the most deeply impacted, accounting for more than one quarter of lower income households that were overpaying for housing. Large related and elderly renter households were the second and third largest cohorts, respectively.

**Table 25: Households Overpaying for Housing by Tenure and Type, City of Stockton and San Joaquin County, 2011-2015**

Household Type	Renter-Occupied Households							
	0-30% AMI		30-50% AMI		50-80% AMI		Total (a)	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Small Related	4,395	10.0%	4,165	9.5%	2,660	6.1%	11,220	25.6%
Cost Burden (b)	325	0.7%	1,960	4.5%	2,095	4.8%	4,380	10.0%
Severe Cost Burden (c)	4,070	9.3%	2,205	5.0%	565	1.3%	6,840	15.6%
Large Related	1,510	3.4%	1,750	4.0%	725	1.7%	3,985	9.1%
Cost Burden (b)	155	0.4%	895	2.0%	670	1.5%	1,720	3.9%
Severe Cost Burden (c)	1,355	3.1%	855	2.0%	55	0.1%	2,265	5.2%
Elderly (e)	1,380	3.1%	1,485	3.4%	760	1.7%	3,625	8.3%
Cost Burden (b)	340	0.8%	630	1.4%	575	1.3%	1,545	3.5%
Severe Cost Burden (c)	1,040	2.4%	855	2.0%	185	0.4%	2,080	4.7%
Other	3,240	7.4%	1,710	3.9%	970	2.2%	5,920	13.5%
Cost Burden (b)	285	0.7%	795	1.8%	830	1.9%	1,910	4.4%
Severe Cost Burden (c)	2,955	6.7%	915	2.1%	140	0.3%	4,010	9.2%
No Cost Burden	835	1.9%	995	2.3%	3,365	7.7%	5,195	11.9%
Cost not computed	825	1.9%	0	0.0%	0	0.0%	825	1.9%
<b>Subtotal, Renter Households (d)</b>	<b>12,180</b>	<b>27.8%</b>	<b>10,100</b>	<b>23.1%</b>	<b>8,485</b>	<b>19.4%</b>	<b>30,765</b>	<b>70.2%</b>
Household Type	Owner-Occupied Households							
	0-30% AMI		30-50% AMI		50-80% AMI		Total (a)	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Small Related	665	1.5%	795	1.8%	1,585	3.6%	3,045	7.0%
Cost Burden (b)	60	0.1%	145	0.3%	985	2.2%	1,190	2.7%
Severe Cost Burden (c)	605	1.4%	650	1.5%	600	1.4%	1,855	4.2%
Large Related	320	0.7%	405	0.9%	765	1.7%	1,490	3.4%
Cost Burden (b)	70	0.2%	125	0.3%	595	1.4%	790	1.8%
Severe Cost Burden (c)	250	0.6%	280	0.6%	170	0.4%	700	1.6%
Elderly (e)	895	2.0%	880	2.0%	860	2.0%	2,635	6.0%
Cost Burden (b)	180	0.4%	215	0.5%	420	1.0%	815	1.9%
Severe Cost Burden (c)	715	1.6%	665	1.5%	440	1.0%	1,820	4.2%
Other	320	0.7%	225	0.5%	515	1.2%	1,060	2.4%
Cost Burden (b)	60	0.1%	65	0.1%	215	0.5%	340	0.8%
Severe Cost Burden (c)	260	0.6%	160	0.4%	300	0.7%	720	1.6%
No Cost Burden	315	0.7%	1,285	2.9%	2,810	6.4%	4,410	10.1%
Cost not computed	385	0.9%	0	0.0%	0	0.0%	385	0.9%
<b>Subtotal, Owner Households (d)</b>	<b>2,915</b>	<b>6.7%</b>	<b>3,590</b>	<b>8.2%</b>	<b>6,540</b>	<b>14.9%</b>	<b>13,045</b>	<b>29.8%</b>
<b>Total, All Households</b>	<b>15,095</b>	<b>34.5%</b>	<b>13,690</b>	<b>31.2%</b>	<b>15,025</b>	<b>34.3%</b>	<b>43,810</b>	<b>100%</b>

**Notes:**

- (a) Includes all households with incomes at or below the 80 percent of the area median income.
- (b) Housing costs greater than 30 percent and less than 50 percent of gross income.
- (c) Housing costs greater than 50 percent of gross income.
- (d) Totals may not equal the sum of parts due to rounding.
- (e) Includes elderly non-family households and family households with 2 persons that are either or both age 62 or over.

Sources: HUD, CHAS 2011-2015; BAE, 2019.

**Table 26: Housing Problems by Tenure and Type, City of Stockton, 2011-2015**

	Renter-Occupied Households									
	0-30% AMI		30-50% AMI		50-80% AMI		80-100% AMI		Total (a)	
Housing Problem Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Substandard Housing (b)	410	0.8%	215	0.4%	115	0.2%	150	0.3%	890	1.7%
Severely Overcrowded (c)	310	0.6%	345	0.7%	180	0.3%	165	0.3%	1,000	1.9%
Overcrowded (d)	1,005	1.9%	1,075	2.0%	860	1.6%	370	0.7%	3,310	6.3%
Severe Housing Cost Burden (e)	8,010	15.2%	4,300	8.1%	885	1.7%	100	0.2%	13,295	25.2%
Housing Cost Burden (f)	880	1.7%	3,310	6.3%	3,620	6.8%	1,230	2.3%	9,040	17.1%
Zero/Negative Income	745	1.4%	0	0.0%	0	0.0%	0	0.0%	745	1.4%
Subtotal, Housing Problems	11,360	21.5%	9,245	17.5%	5,660	10.7%	2,015	3.8%	28,280	53.5%
Subtotal, Renter Households	12,180	23.0%	10,100	19.1%	8,485	16.1%	4,480	8.5%	35,245	66.7%

	Owner-Occupied Households									
	0-30% AMI		30-50% AMI		50-80% AMI		80-100% AMI		Total (a)	
Housing Problem Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Substandard Housing (b)	25	0.0%	35	0.1%	20	0.0%	10	0.0%	90	0.2%
Severely Overcrowded (c)	55	0.1%	75	0.1%	150	0.3%	60	0.1%	340	0.6%
Overcrowded (d)	50	0.1%	175	0.3%	455	0.9%	390	0.7%	1,070	2.0%
Severe Housing Cost Burden (e)	1,725	3.3%	1,635	3.1%	1,445	2.7%	485	0.9%	5,290	10.0%
Housing Cost Burden (f)	365	0.7%	490	0.9%	2,060	3.9%	1,430	2.7%	4,345	8.2%
Zero/Negative Income	375	0.7%	0	0.0%	0	0.0%	0	0.0%	375	0.7%
Subtotal, Housing Problems	2,595	4.9%	2,410	4.6%	4,130	7.8%	2,375	4.5%	11,510	21.8%
Subtotal, Owner Households	2,915	5.5%	3,590	6.8%	6,540	12.4%	4,570	8.6%	17,615	33.3%
Total, All Households	15,095	28.6%	13,690	25.9%	15,025	28.4%	9,050	17.1%	52,860	100%

**Notes:**

- (a) Includes all households at or below the median income level.  
 (b) Lacking complete plumbing or kitchen facilities.  
 (c) Greater than 1.5 persons per room.  
 (d) 1.01 to 1.5 persons per room.  
 (e) Housing costs greater than 50% of gross income.  
 (f) Housing costs greater than 30% but less than 50% of gross income.

Sources: HUD, 2011-2015 CHAS; BAE, 2019.

**Other Housing Problems**

In addition to overpayment (including severe overpayment), HUD reports data on 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 residing 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, an average of 75 percent of households with incomes equal to, or less than, the area median experienced at least one of the four reported housing problems. This included approximately 80 percent of reported renter households and 65 percent of reported owner households. The relative prevalence of housing problems is generally inversely related to household income, with the lowest income household showing the highest incidence of housing problems. The exception to this generally trend is that very low-income (i.e., 50 to 80 percent of AMI) owner-occupied households had

the highest prevalence of housing problems, which is attributable to the relatively limited number of extremely low- (i.e., 0 to 30 percent of AMI) and very low-income (i.e., 30 to 50 percent of AMI) owner occupied households. The most prevalent type of housing problem is overpayment (i.e., cost burden) followed by overcrowding. According to the data, nearly 11 percent of households with incomes up to the median are overcrowded. Around two percent of households have zero or negative income, while a little less than two percent of households live in substandard housing conditions.

#### ***Housing Conditions***

The City of Stockton Neighborhood Services Division (NSD) of the Stockton Police Department carries out enforcement of codes, laws, and regulations for the abatement of substandard housing conditions and blight issues within the City of Stockton. The NSD processed more than 4,000 housing code enforcement cases between 2015 and October 2019, with an average of 811 cases per year assuming a whole year for 2019. Of these cases, around 61 percent resulted in issuance of a Violation Warning indicating the presence of a housing code violation. While it is not possible based on the available data to determine the most common housing code violations cited during this period, housing code violations, by definition, include structural issues and electrical deficiencies as well as exterior housing problems. The majority of housing code enforcement cases during this time frame involved single-family properties. Many of the code enforcement issues which resulted in issuance of a Housing Code Violation Warning were geographically concentrated in the city's older neighborhoods, such as the downtown, midtown and South Stockton along Charter Way, due to the presence of many buildings that were constructed in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries. Other areas with large concentrations of Housing Code Violation Warning issuance include the residential neighborhood to the south east of March Lane and El Dorado Street, and in north Stockton north of East Hammer Lane.

In addition to general code enforcement activities, the NSD also implements the Residential Rental Inspection Program (RRIP), which is required under Stockton Municipal Code, Section 8.32. The purpose of the program is to proactively identify blighted and deteriorating rental housing and ensure rehabilitation or the removal of housing units that do not meet minimum housing standards. Implementation of the RRIP began in December 2006 and occurs in stages, with one of four quadrants of the City undergoing inspection each year. Due to the large geographic size of Quadrant 4 relative to the other quadrants, the City inspects Quadrant 4 over a two-year period.

Quadrant 1, which represents an area of northwestern Stockton, between March Lane and Hammer Lane, was most recently inspected in 2017. The inspection included 287 unique properties. Approximately 51 percent of inspected properties in Quadrant 1 failed to pass inspection, with less than one percent (two properties) failing for hazardous reasons. Quadrant 2, which includes areas to the north of the Stockton Downtown, roughly between March Lane and Harding Way, was most recently inspected in 2018. The inspection included

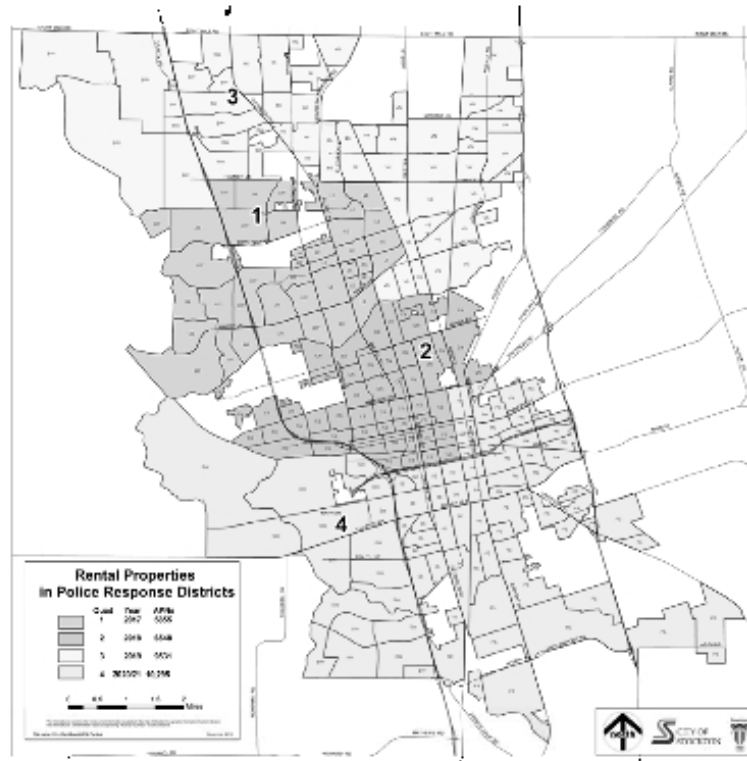
a total of 748 unique properties. Exactly half of the inspected properties failed to pass inspection, with three percent totaling 20 properties failing for hazardous reasons. Quadrant 3, located in upper north Stockton, roughly located north of Hammer Lane, is currently being inspected. As of October 2019, the Quadrant 3 inspection included a total of 706 unique properties. So far, 54 percent failed to pass inspection, with four percent totaling 26 properties failing for hazardous reasons. Quadrant 4, which represents the majority of the City of Stockton to the south of Harding Way, including both South Stockton and Downtown last underwent inspection in 2015 and 2016 and included a total of approximately 745 units. Around 46 percent of the inspected properties failed to pass inspection, with seven percent totaling 50 properties failing to pass inspection. See Figure 13 for additional detail regarding the geographic extent of the various RRIP quadrants

Of the properties inspected under the RRIP, 78 percent were single-family rental units, while 22 percent were multifamily units. This distribution was similar for properties that failed the inspection. While single-family properties still accounted for the majority of properties which failed to pass inspection for hazardous reasons, multifamily properties accounted for a greater share. Roughly 66 percent of properties that failed to pass inspection for hazardous reasons were single-family properties, while 34 percent were multifamily properties.

Quadrant 1, identified in Figure 13 on the following page, was most recently inspected in 2012. The inspection included 5,600 unique properties, with approximately 6.9 percent failing to pass inspection. Quadrant 2 was inspected in 2013 and included inspection of 4,900 properties, with 6.8 percent failing the inspection. Quadrant 3 was last inspected in 2014 and included 8,500 unique properties, with 9.4 percent failing inspection. Quadrant 4 is undergoing inspection in 2015 and 2016, and is expected to include a total of around 9,000 unique properties. Though the inspection has not yet occurred, NSD anticipates identifying an above average proportion of properties presenting a variety of code violations.

Consultations with key stakeholders identified pro-active and sustained code enforcement for single-family housing as well as market rate multi-family housing as well as with strong renter protections as a serious housing need. For example, numerous stakeholders indicate that lower income residents who live in poorly maintained rental units are hesitant to file a code enforcement complaint out of fear of retaliatory eviction. Fred Shiel of STAND Affordable Housing indicates this is especially true of the city's undocumented immigrant population who fear deportation in addition to eviction. However, one important caveat that was noted by stakeholders representing the city's elderly population is that code enforcement efforts must take into account the limited physical ability of many elderly residents to maintain their homes, and that punitive actions, such as fines, should not cause an undue burden which repeats a cycle of blight and fines without meaningful and attainable resolution.

**Figure 13: Residential Rental Inspection Program Response Districts**



Sources: City of Stockton, 2016.

## 2.5 – 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 desegregation 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 minority residents, 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***

While the City of Stockton does not own or operate any 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 involves demolition and replacement of units, there 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. Conway Homes features 436 units, while Sierra Vista currently features 305 units. Combined, these properties currently include a total of 741 public housing units. The HACSJ is currently in the second phase of a multiphase redevelopment of Sierra Vista. Prior to the redevelopment project, Sierra Vista had 396 units. By the end of the redevelopment project these units will be replaced by 500 to 550 new units depending on the final project specifics, resulting in a net increase of 104 to 154 new units. This would bring the total number of public housing units in Stockton to between 936 and 986 units once redevelopment of Sierra Vista is complete.

In addition to Sierra Vista and Conway Homes, the HACSJ also owns and operates a number of market rate properties geared toward lower-income and special needs populations. These include Claremont Manor Apartments, Mourfield Avenue Apartments, and West Park Street Apartments, American Street Apartments, Washington Street Apartments, and a single-family home at 2282 East 8<sup>th</sup> Street. The Claremont Manor is an age-restricted (55 and over) property that offers 52 studio, one- and two-bedroom units. The Mourfield Avenue Apartment is a small property that includes two single-family and two duplex units, while West Park Street Apartments offers a total of 12 studio units. American Street Apartments offers four units, while Washington Street Apartments offers six units.

#### ***Other Affordable Housing Projects***

In addition to the housing projects owned and operated by the HACSJ, there are 53 existing or under construction publicly assisted rental housing projects that provide 3,608 units for lower-income households. Four other affordable rental housing projects totaling approximately 383 rental units are in the development pipeline. This includes the Liberty Square project which is anticipated to adaptively reuse 74 rental housing units, as well as Grand View Village which is anticipated to result in 106 new affordable rental units. Both projects are being developed by Visionary Home Builders. In 2017 the State awarded the Liberty Square project \$8.8 million in four percent federal tax credits. Visionary Home Builders has applied for an additional \$13.8 million in highly competitive nine percent federal tax credits, with a determination expected in fall of 2019. In 2019, the State awarded Visionary Builders \$17.9 million from the Affordable Housing and Sustainable Communities (AHSC) Program to develop the Grand View Village Project. In addition to these two projects, the State awarded the HACSJ \$49.3 million in highly

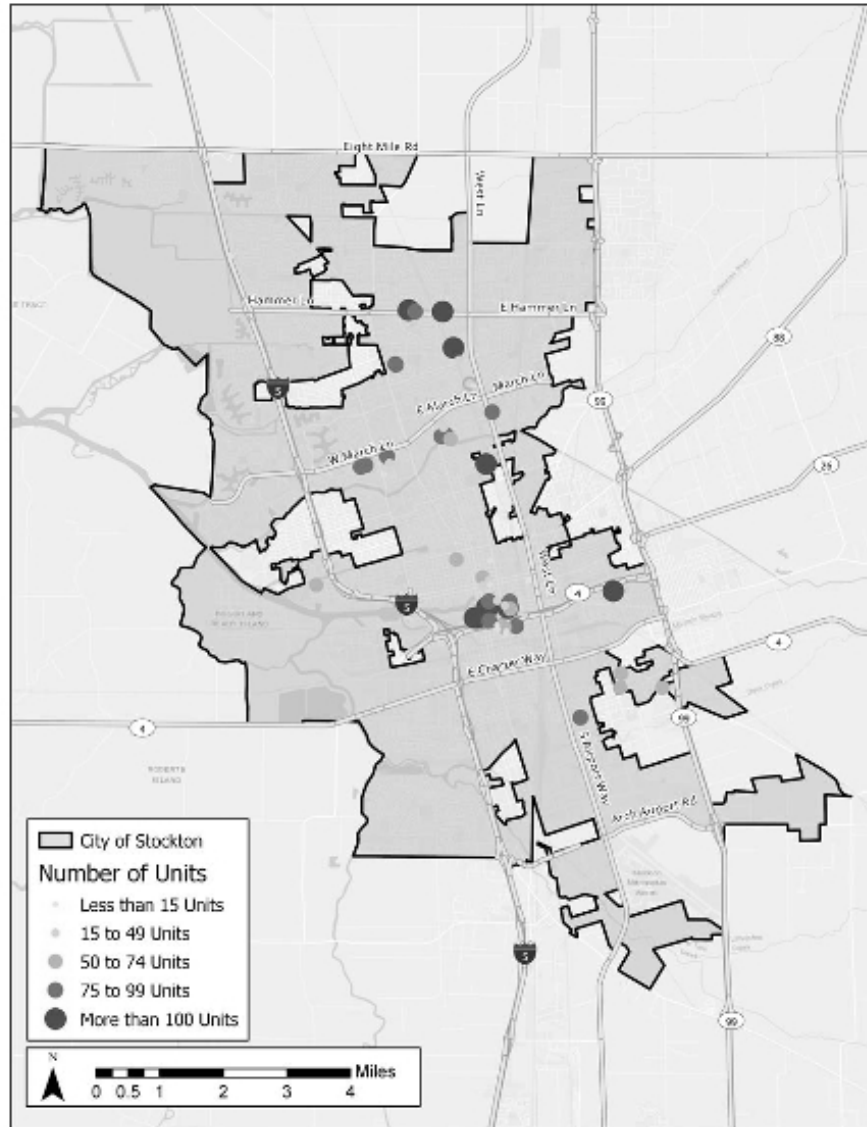
competitive nine percent tax credits for Phases I and II of the Sierra Vista Phase redevelopment project, which is currently underway and will result in a net increase of 110 affordable multifamily units.

Another publicly funded affordable housing project on Turnpike Road between Third and Lincoln Streets that is still in the concept development phase will develop eight to 14 studio- to three-bedroom permanent supportive housing units targeting singles and families coming directly from homeless shelters. This project by the Delta Community Development Corporation (DCDC) is the result of a partnership between the HACSJ, CVLIHC, STAND, and Stockton Shelter for the Homeless. Funding for the project comes from \$3.25 million in State Homeless Emergency Aid Program (HEAP) funding allocated through the CoC, as well as \$300,000 in CDBG funds from the City of Stockton, and an additional \$300,000 loan from the City of Stockton to purchase the property and fund the development costs associated with building the affordable housing units.

Figure 14 illustrates the distribution of public and publicly assisted housing projects throughout the City of Stockton. Comparing this figure with Figure 7 indicates that the public and assisted housing stock is fairly heavily concentrated within low- and moderate-income areas, including downtown Stockton, as well as northeast Stockton along and in between the March Lane and Hammer Lane corridors, with additional public and publicly supported housing in southern Stockton generally east of South Airport Way.



**Figure 14: Public and Assisted Housing Projects, 2019**



Sources: City of Stockton, 2019; BAE, 2019

### ***Housing Choice Vouchers***

The 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 for the identified unit must be not greater than the associated Fair Market Rent (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, including within the City of Stockton. According to the HACSJ, a total of 5,174 households participated in the HCV program countywide as of October 2019, with 3,611 participants (70 percent) residing in units located within the City of Stockton. The majority of the vouchers utilized in Stockton are tenant-based, meaning that vouchers are issued to individual households, who are then responsible for locating suitable housing. Of the total tenant-based and project-based vouchers utilized in Stockton 145 vouchers are issued through the Veterans Affairs Supportive Housing (VASH) program, 55 vouchers issued through the Family Unification program, and eight vouchers are issues through the Mainstream voucher program, which assists non-elderly persons with disabilities.

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 such, many HCVs remain unutilized. For example, data provided by the HACSJ shows that that of the 5,174 HCVs issued countywide, only 78 percent were utilized as of October 2019. This indicates that 1,150 HCV recipients are unable to secure housing despite having an HCV. This is due to a confluence of factors including the stigma associated with HVC recipients and the difficulty of finding a willing landlord who has a vacant unit that also meets quality standards and rental limits set by HUD. Stakeholders report that in many cases, landlords are discouraged from accepting HCVs because the per unit operating costs and restricted rental rates exceed the Fair Market Value set by HUD, which would result in a net deficit to the landlord. As an incentive for landlords to accept HCVs, in 2018 the CVLIHC began offering 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 have expanded the pool of landlords willing to accept HCVs, demand for HCV unit still dramatically exceeds supply which results in an impediment to fair housing choice for lower-income residents.

**Table 27: Housing Choice Voucher (HCV) Participants by Type, City of Stockton**

Racial Category	Vouchers			Special Purpose Vouchers (a)			
	Project Based	Tenant Based	Total	Veterans Affairs Supportive	Family Unification Program	Disabled (b)	Total
White	121	1,112	1,233	89	38	5	132
Black/African American	138	1,647	1,785	54	9	3	66
Asian	14	449	463	2	5	0	7
American Indian/Alaska Native	3	46	49	0	0	0	0
Pacific Islander	5	13	18	0	0	0	0
Other	3	59	62	0	3	0	3
<b>Total, All</b>	<b>285</b>	<b>3,326</b>	<b>3,611</b>	<b>145</b>	<b>55</b>	<b>8</b>	<b>208</b>

Notes:

(a) Special purpose voucher participants are a subset of project based and tenant-based voucher holders.

(b) Data reported for disabled special purpose voucher holders refers to participants of the Mainstream housing voucher program.

### ***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 child care 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 28, there are a total of 498 licensed community care facilities located in Stockton. This includes a diversity of facilities and specialized service providers ranging from adoption agencies and child care centers, small-family homes, adult daycare facilities, residential care facilities for adults and the elderly, and social rehabilitation facilities, among others. Figure 15, on the following page, shows the distribution of these facilities throughout Stockton. The figure and the table do not include residential care facilities 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. Based on this representation, community care facilities appear fairly well distributed throughout the community, with facilities available in both lower-income and upper-income neighborhoods. However, there is some concentration of certain types of facilities within certain areas. For example, there is a portion of southwestern Stockton, south of Highway 4 and west of I-5, which shows a clear concentration of elder care and adult residential facilities.

**Table 28: Licensed Community Care Facilities, 2019**

	Licensed Facilities		Pending Licensure		Total, All Facilities	
	Number	Capacity	Number	Capacity	Number	Capacity
Foster Family Agencies	11	184	0	n.a.	11	184
Residential Elder Care Facility	59	1,828	5	326	64	2,154
Residential Care for Children			(a)			
Child Care Centers	141	6,396	6	178	147	6,574
Capacity of 8 or less	3	710	1	55	4	765
Capacity of more than 8	138	1,694	5	30	143	1,724
Adult Residential Facilities	146	2,404	13	85	159	2,489
<b>Total, All Facilities (b)</b>	<b>498</b>	<b>13,216</b>	<b>30</b>	<b>674</b>	<b>528</b>	<b>13,890</b>

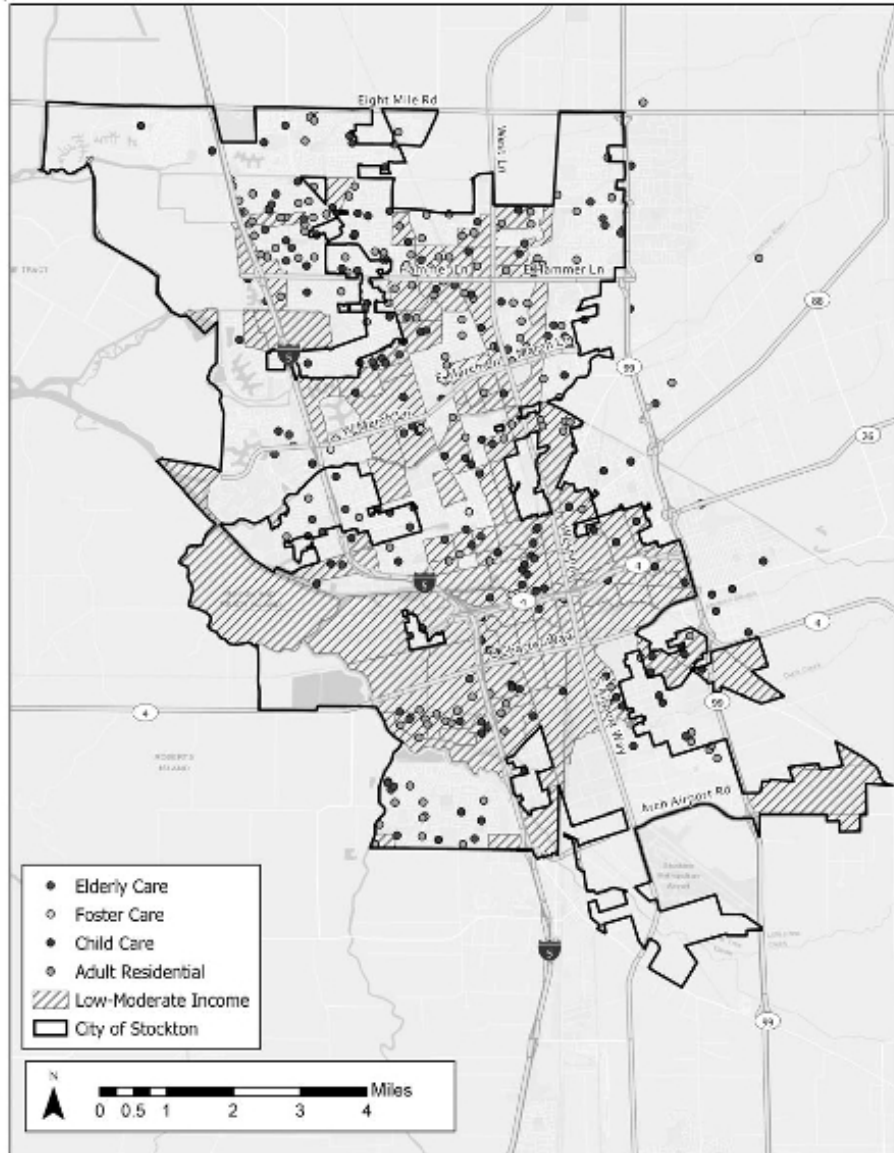
Notes:

(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 Social Services, Community Care Licensing Division, 2019; BAE, 2019.

**Figure 15: Community Care Facilities**



Note:

(a) Figure does not include data on 24-hour child residential care centers due to confidentiality issues.

Sources: City of Stockton, 2019; California Social Services, Community Care Licensing Division, 2019; BAE, 2019.

## 2.6 – 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 the City of Stockton and evaluates access to employment and economic opportunity for members of protected classes.

### Major Employment Centers

According to projections by the San Joaquin Council of Governments (SJCOC), there were approximately 234,859 jobs in San Joaquin County in 2015, which is the base year for SJCOC's projections. By 2020, SJCOC anticipates this number will increase to approximately 256,019 jobs. An estimated 47 percent of the county's jobs will be located in the City of Stockton by 2020, continuing Stockton's role as the largest employment center in the county, followed by the unincorporated county, which will account for around 23 percent of countywide employment. Other notable employment centers include the Cities of Lodi and Tracy, which will each account for around 10 percent of countywide employment, respectively, by 2020.

**Table 29: 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	23,805	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%
<b>San Joaquin County</b>	<b>234,859</b>	<b>256,019</b>	<b>270,185</b>	<b>285,095</b>	<b>299,918</b>	<b>314,544</b>	<b>1.0%</b>

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

Consistent with the above data on the distribution of employment by jurisdiction, the Stockton area hosts 12 of the county's 25 largest employers, which are listed in Table 30. Reflecting the city's relatively diverse employment base, these employers represent a number of industries, including medical, agricultural, manufacturing, educational, and public sector industries. This includes three County Government offices including Foster Care Services, Human Services, and general governmental services, as well as the N.A. Chaderjian Youth Correctional Facility operated by the California Department of Corrections (CDC). Another three of the county's largest employers located in Stockton are educational institutions, such

as the San Joaquin County School District, the Stockton Unified School District, and the University of the Pacific. Two medical facilities, including Dameron Hospital and St. Joseph's Cancer Center are also some of the county's largest employers, as are O-G Packing and Cold Storage Company and Morado Produce, which are both fruit and vegetable growers and shippers. Inland Flying Services, an aircraft service and maintenance company, is another large employer. The majority of the county's largest employers located in Stockton employ between 1,000 and 4,900 employees, while the remainder employ between 500 and 999 employees.

**Table 30: Major Employers, San Joaquin County, 2018**

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 Chaderjan 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
Sigov	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 Corpnct	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**

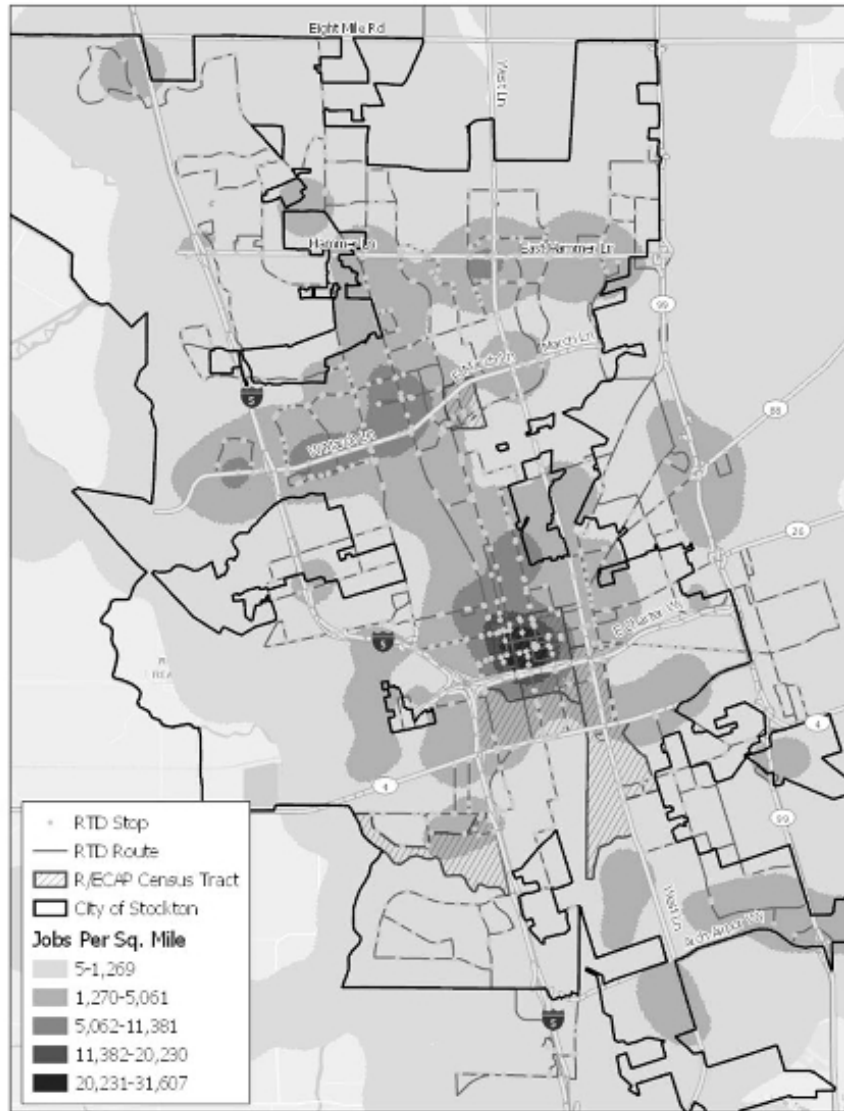
Figure 16 illustrates the distribution of employment throughout the City of Stockton on a jobs per square mile basis, in relation to existing San Joaquin Regional Transit District (RTD) bus stops and routes, as well as the R/ECAP census tracts identified earlier. As shown in the figure, the downtown area is Stockton's major employment center, with peripheral employment centers in norther Stockton along March Road between Pacific Avenue and I-5 and around the intersection of East Hammer and West Lanes. Employment centers in central and northern Stockton either overlap or are in close proximity to R/ECAP areas and are generally well served by public transportation. Comparison with the location of publicly assisted housing facilities, as shown in Figure 14, indicates that residents of publicly assisted

housing facilities in central and northern Stockton are also generally in close proximity to employment centers and public transit access.

However, Figure 16 also shows that residents in R/ECAP Census Tracts in southern Stockton have much more limited access to employment opportunities and public transportation facilities. This includes residents of Conway Homes and Sierra Vista, which are both located in south Stockton. Resident Council presidents from both Conway Homes and Sierra Vista indicate that access to timely and efficient public transportation is one of the greatest issues facing public housing residents, both in terms of residents' ability to access and maintain employment opportunities, but also residents' ability to access key amenities such as grocery stores, medical services and other supportive services such as food banks. Additionally, numerous public, private, and non-profit service providers indicate that the existing public transportation system is not robust enough to get workers to and from their jobs in a timely manner, particularly for those who work in many of the industrial areas which are not well serviced by public transit, such as the area around the airport in South Stockton. This has made it difficult for lower-income residents to maintain steady employment and the earned income stream necessary to afford stable housing.



**Figure 16: Concentration of Jobs, City of Stockton, 2015**



Sources: U.S. Census Bureau, Longitudinal Employer-Household Dynamics (LEHD), OnTheMap, 2015, ACS 2017 5-year sampling period, S1701; BAE, 2019.BAE, 2019.

## 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, policies, and practices established by local government agencies. The analysis primarily focuses on those items that are under the direct purview of the City of Stockton.

#### *General Plan*

The City of Stockton is required under the laws of the State of California to establish a comprehensive, long-term general plan that functions as a guide for growth and development within its jurisdictional boundaries and provides direction for making decisions regarding land use and public service provision. All specific plans, subdivisions, public works projects, and zoning decisions must be consistent with the general plan. The current Envision Stockton 2040 General Plan, which was adopted by the City Council on December 4, 2018, represents a comprehensive revision to previously adopted 2035 General Plan, that shifts the focus of development away from urban fringe development to more centralized development within the City's existing limits.

This fundamental shift in the City's land use policy was spurred by a number of legal and legislative factors. Following the adoption of the 2035 General Plan in 2007, the Sierra Club filed a suit against the City of Stockton, claiming inadequacies in the environmental documentation, as well as other parts of the general plan document. In 2008, the City entered into a Settlement Agreement that obligated the City to consider adoption of a Climate Action Plan, a Green Building Program, and a Transit Gap Study, among other amendments and requirements. However, as of mid-2014, the City of Stockton had not yet satisfied these obligations. Per the Settlement Agreement, any amendment to the general plan must balance development on the urban fringe with accompanying infill development in order to be consistent with the state mandate, under Assembly Bill (AB) 32, of reducing greenhouse gas (GHG) emissions, since unbalanced development will cause increased driving and motor vehicle emissions. While compliance with the terms of the agreement requires the City to encourage significant infill housing development, the 2010 Housing Element indicated that the implementation of a Green Building Program could potentially add to the upfront costs of producing housing.

Other significant legislative factors that spurred the General Plan Update include the implementation of Senate Bill (SB) 375, among other pieces of legislation. According to the legislation, in order for the City to maintain eligibility for transportation funding, the General Plan must be consistent with the San Joaquin Council of Governments' (SJCOC) regional Sustainable Community Strategy (SCS) and Regional Transportation Plan (RTP) plans; however, the 2035 General Plan growth projection and boundary policies differed greatly from the SCS and RTP. The adoption of SB 375 also eliminated two influential components of California transportation planning policy that previously discouraged investments in urban infill development, including the resolution that level of service (LOS) and parking impacts can no longer be viewed as significant impacts during the environmental review process under the California Environmental Quality Act (CEQA). This consequently facilitates attempts to promote infill development in established pedestrian-capable areas without obligatory regard for localized traffic and/or parking impacts.

Other non-legislative factors included the elimination of Community Redevelopment Law as a tool for directing investment, as well as the recognition that changes may be necessary with regard to the City's growth management policies. As part of the 2011 Budget Act, the State of California dissolved more than 400 existing redevelopment agencies, including an agency that managed redevelopment in downtown Stockton and surrounding areas. Development of the 2035 General Plan occurred during a time when the resources and powers of redevelopment were available. In the wake of dissolution, the City needed to re-assess its resources and identify alternative funding sources and implementation tools and develop a new approach to public/private partnerships. In addition, the City approved the development of nearly 26,500 additional housing units during the early 2000s through Vested Tract Maps and Development Agreements. If developed, this would represent a substantial increase in the city's housing supply that could go forward without regard to changes in housing policy. As a result, the 2040 General Plan considers how to recognize the obligations associated with these prior approvals and accommodate them with similar recognition to the City's commitments under the Sierra Club settlement and the adopted SCS, among others, as well as in light of the City's efforts to maintain solvency and improve basic services.

#### ***Housing Element***

One of the seven 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, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law is predicated on the assumption that in order for the private market to adequately satisfy housing demand, and address housing needs as they may arise, local governments must adopt land use plans and regulatory frameworks that do not unduly constrain, and provide opportunities for, housing development that is characterized by a variety of housing types that 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. The Stockton City Council adopted the current housing element on April 12, 2016 and HCD reviewed it and found it in compliance with state housing element law in June of the same year. It should be noted that the current housing element reflects the 2035 General Plan policies and has not yet been updated according to the 2040 General Plan.

Key components of the housing element include, but are not limited to, the following:

- Identify actions that will be taken to make sites available with appropriate zoning and development standards and with services and facilities to accommodate the jurisdiction's share of the regional housing need at all income levels, including multi-family rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing;
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households;<sup>9</sup>
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities;
- Conserve and improve the condition of the existing affordable housing stock; and
- Promote housing opportunities for persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.<sup>10</sup>

#### ***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, including density, setbacks, and other development standards. 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.

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<sup>9</sup> Housing element law identifies income categories which are somewhat different than those defined by HUD. These include extremely low-income (30 percent AMI), very low-income (50 percent AMI), low-income (80 percent AMI), moderate-income (120 percent AMI), and above moderate-income (greater than 120 percent AMI).

<sup>10</sup> Housing element law does not cover all classes protected under state and federal fair housing laws. The AI report expands the definition of a protected class beyond that prescribed under housing element law.

The nine residential land use designations established under the 2040 General Plan permit a range of residential development types and densities, including those identified in Table 31. The general plan permits some flexibility by allowing certain residential uses in specified non-residential land use categories, including Commercial, Administrative Professional, and Open Space/Agriculture. For the higher-density residential designations – including High Density Residential (HDR), Administrative Professional (AP), and Commercial (C) – maximum allowable densities differ based on the location of development. For example, development in Stockton's outside greater downtown area is permitted at densities up to 30 dwelling units per acre (du/ac), while development on land with higher-density designations that is located inside greater downtown is permitted at densities up to 90 du/ac. The highest residential density in Stockton is allowed inside the downtown core, at a maximum of 136 du/ac. Given existing land purchase prices and anticipated development costs, multifamily housing densities of 30 du/ac or more are typically considered adequate to allow for the production of affordable housing. Likewise, single-family residential designations that allow densities greater than six du/ac should provide opportunities to construct moderate-cost single-family residential development.

**Table 31: General Plan Land Use Designations Allowing Residential Uses**

Land Use Designation	Code	Uses	Maximum Net Density (dw/acre)				Consistent Zoning Districts
			Citywide	Outside Greater Downtown	Inside Greater Downtown	Inside Downtown Core	
Residential Estates	RE	Single-family residential units, public and quasi-public uses, second units, and other similar compatible uses.	1	n.a.	n.a.	n.a.	RE
Low Density Residential	LDR	Single-family residential units, duplexes, triplexes, semi-detached patio homes, townhomes, public and quasi-public uses, second units, and other similar and compatible uses.	8.7	n.a.	n.a.	n.a.	RL
Medium Density Residential	MDR	Single-family residential units, duplexes, triplexes, semi-detached patio homes, townhomes, public and quasi-public uses, second units, and other similar and compatible uses.	17.4	n.a.	n.a.	n.a.	RM
High Density Residential	HDR	Multifamily residential units, apartments, dormitories, group homes, guest homes, public and quasi-public uses, and other similar and compatible uses.	n.a.	30	90	135	RH
Administrative Professional	AP	Business, medical, and professional offices, and public and quasi-public uses, and other similar and compatible uses. Ancillary retail uses that provide office workers and residents in the immediate area with convenient access to daily services and necessities near their work are allowed. This use is appropriate on the borders of residential areas.	n.a.	30	90	135	CO, UC
Commercial	C	A wide variety of retail, service, and commercial recreational uses, business, medical and professional offices, residential uses, public and quasi-public uses and other similar and compatible uses. Community or regional commercial centers as well as freestanding commercial establishments are permitted. Limited indoor industrial uses are allowed.	30	90	135		CH, CG, CD, CL, CA
Open Space/ Agriculture	OSA	Agriculture, parks, single-family residential units, farmworker housing, wetlands, wildlife reserves, and other similar and compatible uses and structures related to the primary use of the property for preservation of natural resources or agriculture. Lands under this designation are intended to remain unincorporated and under the jurisdiction of San Joaquin County.	1 du/parcel (40 acre minimum parcel size)	n.a.	n.a.	n.a.	OS
Mixed Use	MU	A mixture of compatible land uses including residential, administrative and professional offices, retail and service uses, industrial, and public and quasi-public facilities to be determined through a Master Development Plan adopted concurrently with the designation of the property as MU.	30 (100 acres minimum development size)	n.a.	n.a.	n.a.	MX
Economic and Education Enterprise		Development is intended to support the City's economic development goals by attracting new businesses, industries, and/or educational institutions that provide high-quality jobs to the local workforce. Business envisioned for this designation include those in the following industries: education; healthcare and medical facilities; high-tech manufacturing; agricultural technologies; energy resources and technologies; and professional and information technologies.	24 (a)	n.a.	n.a.	n.a.	(b)

**Notes:**

- (a) This zoning designation allows for variation from development standards, as approved by the City, in order to meet economic development goals.  
(b) Any zoning district that allows uses that are consistent with the intended uses of this designation and the project.

Sources: City of Stockton 2040 General Plan, 2018; BAE, 2019.

### ***Zoning Ordinance and Other Regulations***

The City of Stockton regulates the type, location, and scale of residential development through its Development Code (Title 16 of the Stockton Municipal Code), which establishes a set of zoning districts that correspond with each of the previously identified general plan land use designations. The zoning districts identify permitted uses and associated development standards. Several aspects of the zoning ordinance may affect access to housing, or limit the range of available housing choices, which are described in greater detail below. Unless otherwise noted, most of these potential impediments have either been addressed, or will be addressed, through implementation of the adopted housing element.

### ***Provisions for Second Units***

Second 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 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). The existing zoning code enacted within the City of Stockton allows second units in all residential zoning districts with administrative approval, so long as the unit complies with all applicable development standards. The adopted development code dictates that the floor area of an attached second unit cannot exceed 50 percent of the living area of the main dwelling, while the floor area of detached units cannot exceed 1,200 square feet. Depending on the design configuration, second units are subject to the same development standards as other accessory and residential structures, including setbacks, height limits, and maximum lot coverage requirements, except that accessory dwelling units are not subject to minimum parking requirements.

### ***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. 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. The provisions outlined under Chapter 16.40 of the Stockton Municipal Code are in compliance with state laws and indicate that residential developments can qualify for a density bonus if they dedicate at least ten percent of the total unit count for occupancy by low-income households, or if they dedicate five percent of the total unit count for occupancy by very low-income households. Senior housing developments and mobile home parks that limit residency based on age are also eligible, as are condominium projects that offer for-sale housing to moderate-income households.

#### 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 nontraditional 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.

The adopted zoning ordinance of the City of Stockton does not define what constitutes a "family." The municipal code, instead, defines a "household" as "one or more persons occupying a dwelling." The code places no numerical limits on the number of unrelated persons living in homes, and no occupancy standards based on family status, which would otherwise constitute discriminatory practices under federal fair housing law.

#### 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.

Under the existing Stockton municipal code, individual manufactured homes on a permanent foundation are defined as single-family dwellings and are permitted in all residential zones.



Mobile home parks are permitted with an Administrative Use Permit in the Residential Low-Density (RL), Residential Medium-Density (RM), Residential High-Density (RH), General Commercial (CG), and Commercial Downtown (CD) zoning districts with an administrative use permit. The municipal code (Section 16.72.210) identifies a set of development standards specific to mobile home parks, including minimum gross area of five acres and a minimum of 50 mobile home spaces, along with assorted siting requirements that are in compliance with applicable state law and, as such, do not constitute an impediment.

#### 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. Under the City of Stockton Zoning Code, emergency shelters for the homeless are permitted by-right in the PF, IG, IL zoning districts, and with a Commission Use Permit in the RH, Com CG, and CD zoning districts. State housing element law also requires that “transitional housing and supportive housing shall be considered a residential use of property, and shall be subject only to those restrictions that apply to other residential dwellings of the same time in the same zone.” Under Stockton’s existing zoning code, transitional housing facilities are permitted in all zones allowing residential uses, subject only to those requirements and restrictions that apply to other residential uses of the same type in the same zone.

#### 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. The 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. In conformance with state law, the City of Stockton permits residential care facilities with six or fewer clients by-right in the five zoning districts (RL, RM, RH, CD, and PF). Family care homes with seven or more clients are allowed with a Commission Use Permit in the RE, RH, and CD zones, and with a Land Development Permit in the PF zone. Senior care facilities with seven or more clients are allowed with an Administrative Use Permit in the RM, RH, CO, and CD zones, and with a Land Development Permit in the PF zone. Assisted living facilities are allowed by-right in the RH, CO, CN, CG, and CD zones, with an Administrative Use Permit in the RE zone, with a Commission Use Permit in the RM zone, and with a Land Development Permit in the PF zone.

#### 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, the City of Stockton utilizes the California Building Code, which is updated periodically both at the state and local levels. As of January 2017, the City adopted the 2016 edition, which remains in effect as of this writing. Because the City's building codes are consistent with the codes applied in most other jurisdictions throughout California, they are not perceived to negatively impact the construction of affordable housing and do not, therefore, represent an impediment to fair housing choice.

#### Parking Standards

In many cases, off-street parking requirements can require 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 subsequently increases the overall cost of development, which can have an impact on affordability. Stockton's off-street parking standards for residential uses include two spaces per single-family dwelling, townhouse, duplex or triplex unit. Senior housing projects must provide one covered space for every two units, reflecting the reduced propensity of seniors to drive and own cars. Multifamily developments must provide one and half parking spaces per unit. Rooming and boarding houses are required to offer one space for every two beds, while residential care facilities are required to offer one space for every five beds, or two spaces for every single-family unit. The municipal code allows the Director or the Commission to grant up to a 20 percent reduction in the number of required off-street parking spaces with an approved variance. In order to qualify for a variance, the developer must demonstrate a reduced need for parking. Overall, the adopted parking standards are relatively low and do not represent a significant constraint or impediment to affordable and infill housing development,

among other housing types. However, some affordable housing developers indicate they struggle to receive approval of modified parking standards in areas outside the downtown.

#### Development Fees and Other Exactions

Like many jurisdictions, the City of Stockton 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.

In 2013, the City of Stockton Development Oversight Commission presented the results of a development impact fee review. The analysis identified that the City's impact fee schedule is generally sound, but that the Capital Facilities Fees (CFF) need to be updated and the Community Development Department (CDD) permit and processing fees are in need of reform. The study indicates that the City is functioning under a reduced fee schedule that was put in place as a response to the economic downturn. The study recommends a full technical update of the CFF, though incremental adjustments should be made in the near-term, with a complete update occurring in conjunction with the comprehensive general plan amendment. Though the fees paid by developers can vary greatly from project to project, the analysis indicates that the costs associated with a typical single-family home were equal to \$49,800 in 2013, based on a survey conducted in 2012 by the San Joaquin Partnership. At this level, the fees are similar to those charged for similar projects in the City of Sacramento and other municipalities.

It is unclear how the 2040 General Plan's directive to conduct a study to explore the feasibility of inclusionary housing requirements, in-lieu fees, density bonus, modified fee structures, and/or tax incentives to promote the inclusion of a meaningful percentage of affordable units within market rate housing projects would impact the overall cost to construct housing in the City of Stockton. On the one hand, increasing or modifying these requirements could result in additional funding for affordable housing or the construction of new housing units as part of market rate developments, thereby increasing the City's overall affordable housing stock. On the other hand, requirements that are overly onerous could result in fewer new homes being built. The potential impacts of such changes will hinge on the forthcoming feasibility analysis.

## 3.2 – Impediments in the Private Sector

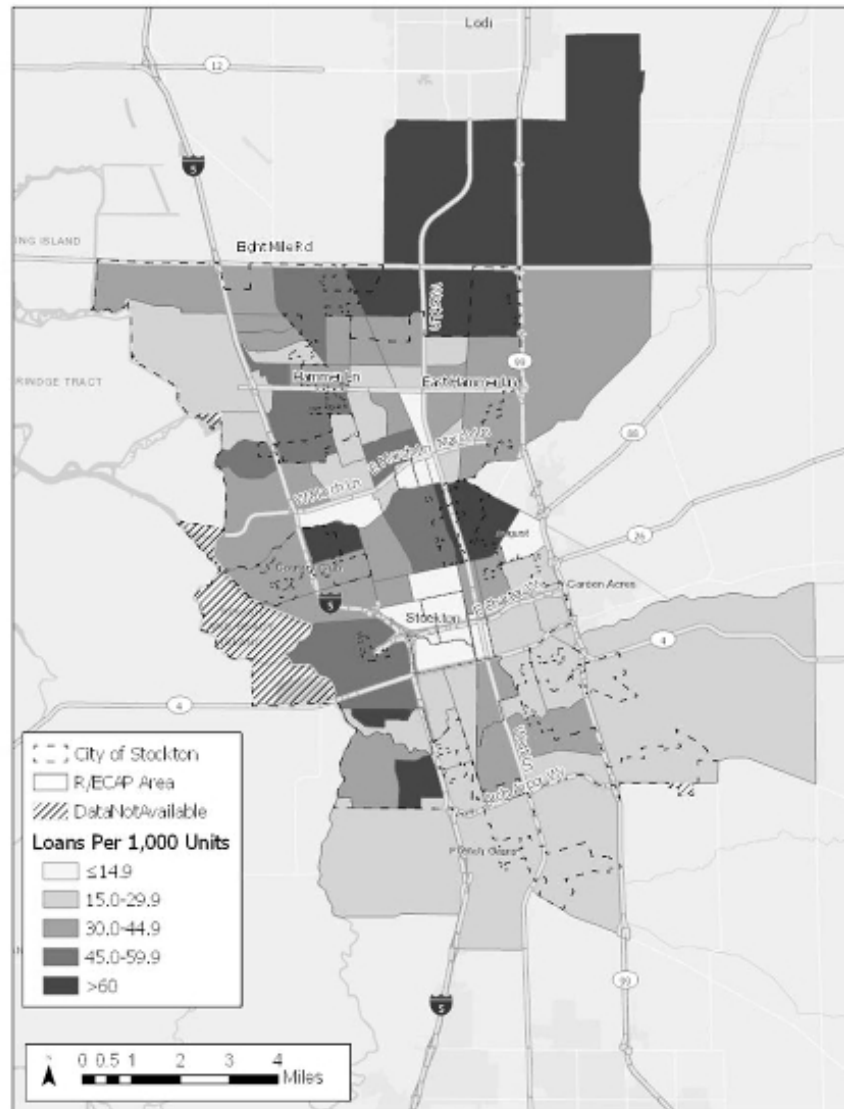
### *Equal Opportunity in Mortgage and Home Improvement Financing*

#### Geography of Mortgage Lending

Figure 17 illustrates the geographic distribution of mortgage lending by Census Tract within the City of Stockton. Based on these data, some of the areas with the lowest lending rates include downtown Stockton, as well as areas in northern Stockton between the Calaveras River and March Lane and the portion of the city between the Calaveras River and East Hammer Lane bordered by West Lane to the east and the railroad tracks to the west. Comparison with the R/ECAP area boundaries indicate that lending rates are relatively low in these areas.

Some of the areas with above-average lending rates include parts of northern Stockton east of I-5 and north of West Benjamin Holt Drive, as well as neighborhoods in the northeastern corner of the city, to the north of March Lane and east of the railroad tracks, and directly north of the downtown. Some of the neighborhoods in southern Stockton east of I-5 also show relatively high lending rates, though these are also located on the city's periphery. They include the areas around Carolyn Weston Boulevard, as well as the area between the Port of Stockton and Houston Avenue and Lever Boulevard.

**Figure 17: Number of Loans Originated Per 1,000 Housing Units, 2017**



Sources: FFIEC, Home Mortgage Disclosure Aggregate Reports, 2017; Census Bureau American Community Survey 2013-2017; BAE, 2019.

#### 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.

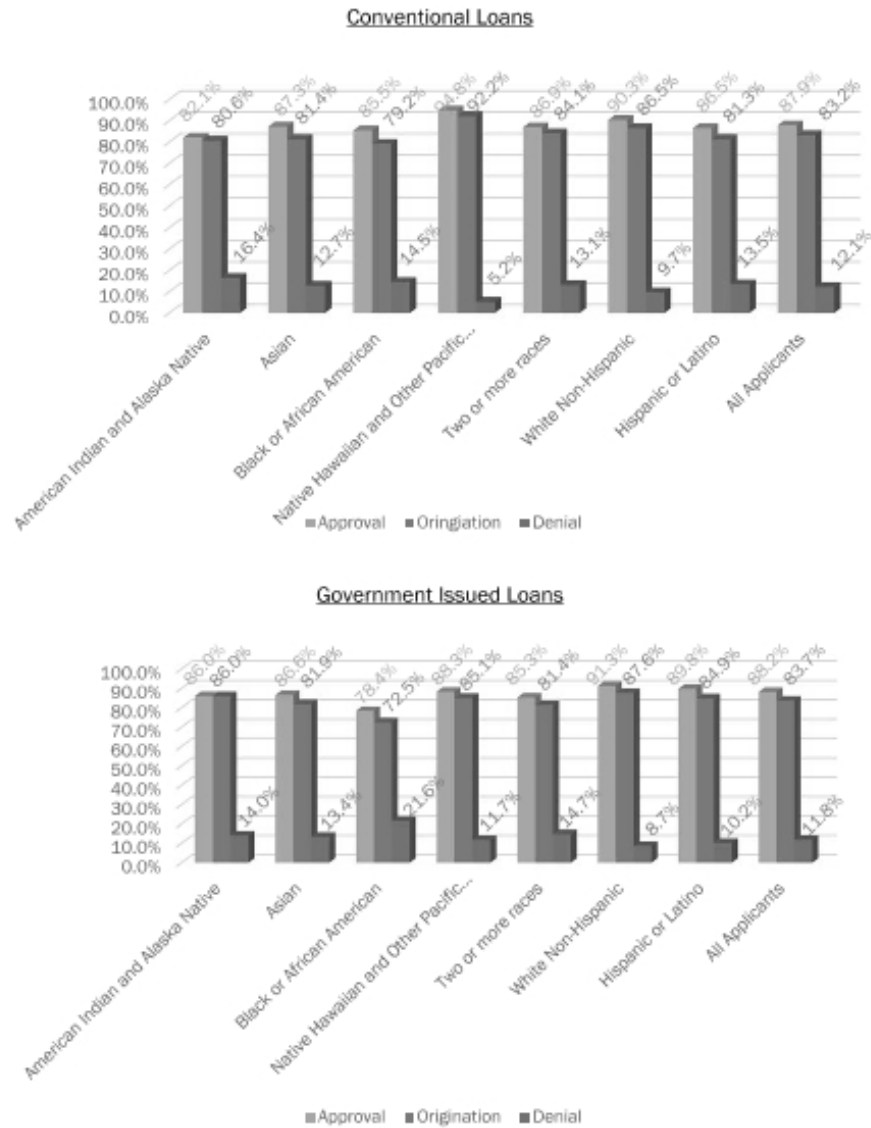
According to these data, prospective borrowers submitted 8,915 applications for conventional mortgage financing to financial institutions in San Joaquin County in 2017. Of those, 20 percent were either withdrawn or determined to be incomplete, leaving 7,132 valid applications. Applicants belonging to a minority racial or ethnic groups accounted for the majority of loan applicants. For example, there were a total of 5,966 conventional loan applications submitted by minority individuals or households in 2017,<sup>11</sup> which accounted for nearly 67 percent of all applications. Considering minority residents accounted for approximately 67 percent of the population in San Joaquin County according to the 2013-2017 ACS, minority groups as a whole are proportionally represented. This trend also holds true for government issues loan applications, where minority residents accounted for around 70 percent of loan applications. Asian, American Indian, Native Hawaiian or Pacific Islander racial groups are relatively well represented in conventional mortgage applications. Groups that are notably under-represented include African Americans, Hispanic or Latinos. For government issues loans, Asian and Hispanic or Latino applicants were proportionally underrepresented.

The data indicate that around 92 percent of all valid conventional loan applications were approved, while 87 percent were also accepted by the borrower, resulting in the origination of a loan. An average of 13 percent of valid conventional loan applications were denied. Overall, White applicants experienced the highest approval and origination rates, at 90.2 and 86.5 percent, respectively. The denial rate among White applicants was, in contrast, below the average, at 9.7 percent. Applicants belonging to a minority racial or ethnic group, by contrast, experiencing below average approval and origination rates for conventional loans, at 86.7 percent and 81.5 percent, respectively. Consequently, denial rate among minority applicants was above average, at 13.3 percent. Although they account for 115 valid loan

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<sup>11</sup> This figure includes only those applications that were not withdrawn or determined to be incomplete.

**Figure 18: Loan Origination and Denial Rates by Race and Ethnicity, 2017**



Sources: FFIEC, Home Mortgage Disclosure Aggregate Reports, 2017; Census Bureau American Community Survey 2013-2017; BAE, 2019

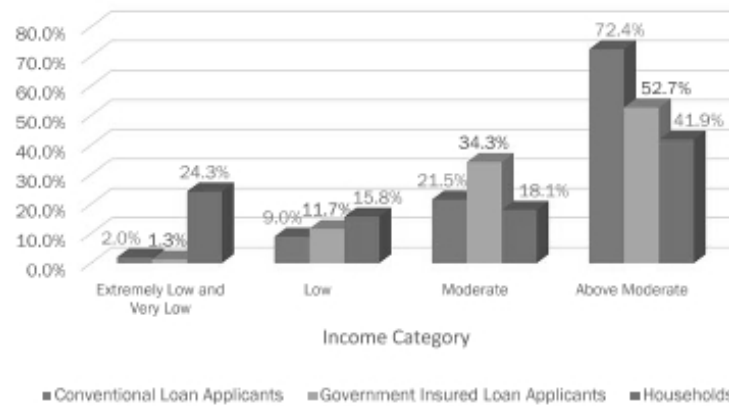
applications and 106 loan originations, Native Hawaiian and Pacific Islander applicants had an approval rate of 94.8 percent and an origination rate of 92.2 percent, with an associated denial rate of only 5.2 percent. Applicants belonging to two or more races accounted for 176 valid applications for conventional loans, had a below average approval rate of 86.9 percent, but an above average origination rate of 81.4 percent, with an above average denial rate of 13.1 percent. The remaining racial groups had approval and origination rates that were below the countywide average, with the highest denial rates evident among American Indian and African American applicants. Hispanic and Asian applicants also had below average approval and origination rates, though they differed from the average by less than two percent. Among government insured loans, White applicants had the highest approval and loan origination rates, with minority applicants generally having below average approval rates but above average loan origination rates. Hispanic applicants were the exception, having above average approval and loan origination rates. Denial rates were highest among African American applicants, with 21.6 percent of their valid applications denied.

Broken down by income category, lower-income applicants are generally under-represented, compared to their higher income counterparts. For example, the 2011-2015 CHAS data indicate that approximately 40.1 percent of all households in San Joaquin County had incomes of 80 percent of AMI or less. The HMDA data indicate that only 10.9 percent of valid conventional loan applications and 13.0 percent of valid government insured loan applications received in 2017 were submitted by lower-income applicants. By comparison, above moderate-income households (incomes equal to, or greater than, 120 percent of AMI) account for 72.4 percent of households in San Joaquin County, as well as 41.9 percent of the valid conventional loan applications, and 52.9 percent of valid government insured loan applications received in 2017. The data presented in Table 32 and Figure 19, also indicate that moderate-income households (incomes between 80 and 120 percent of AMI) are relatively well represented among home loan applicants. For example, moderate-income households accounted for 21.5 percent of valid conventional loan applications and 34.3 percent of government issued loan applications submitted within San Joaquin County in 2017 but accounted for around 18.1 percent of all households in the county between 2011 and 2015.

Overall, these data do not indicate the presence of discriminatory lending practices, since minorities and lower- or moderate-income households do not seem to be under-represented among loan approvals and originations.



**Figure 19: Loan Applications by Income Category, 2017**



Sources: FFIEC, Home Mortgage Disclosure Aggregate Reports, 2017; Census Bureau American Community Survey 2013-2017; BAE, 2019

**Table 32: Disposition of Home Loans by Income Category and Race/Ethnicity, 2017**

	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		Total
	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	White (a)	Minority (b)	
Conventional Loans (c)													
Applications Received	33	134	206	548	212	665	266	710	2,232	3,909	2,949	5,966	8,915
Withdrawn or Incomplete	6	20	30	85	31	133	39	115	305	669	411	1,022	1,783
% Withdrawn or Incomplete	18%	15%	15%	16%	15%	20%	15%	16%	14%	17%	14%	17%	20%
Valid Applications (d)	27	114	176	463	181	532	227	595	1,927	3,240	2,538	4,944	7,132
Applications Approved	19	76	145	373	156	453	209	514	1,763	2,868	2,292	4,284	6,576
% Valid Applications	70%	67%	82%	81%	86%	85%	92%	86%	91%	89%	90.3%	86.7%	92.2%
Loans Originated	18	69	139	352	150	423	197	477	1,691	2,710	2,195	4,031	6,226
% Valid Applications	67%	61%	79%	76%	83%	80%	87%	80%	88%	84%	86.5%	81.5%	87.3%
Applications Denied (d)	8	38	31	90	25	79	18	81	164	372	246	660	906
% Valid Applications	30%	33%	18%	19%	14%	15%	8%	14%	9%	11%	9.7%	13.3%	12.7%
Government Insured Loans (c)(e)													
Applications Received	11	47	121	398	156	548	216	582	786	1,458	1,290	3,043	4,333
Withdrawn or Incomplete	2	8	20	73	21	102	32	107	100	221	175	511	686
% Withdrawn or Incomplete	18%	17%	17%	18%	13%	19%	15%	18%	13%	15%	14%	17%	16%
Valid Applications (d)	9	39	101	325	135	446	184	485	686	1,237	1,115	2,532	3,647
Applications Approved	6	26	80	269	119	380	172	416	641	1,107	1,018	2,198	3,216
% Valid Applications	67%	67%	79%	83%	88%	85%	93%	86%	93%	89%	91%	87%	88%
Loans Originated	5	22	75	250	112	359	166	392	619	1,053	977	2,076	3,053
% Valid Applications	56%	56%	74%	77%	83%	80%	90%	81%	90%	85%	88%	82%	84%
% Applications Received	27%	28%	17%	14%	10%	12%	6%	12%	6%	9%	8%	11%	10%
% Valid Applications	33%	33%	21%	17%	12%	15%	7%	14%	7%	11%	9%	13%	12%

**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, FSA/RHS, and VA home loans on 1-4 family and manufactured dwellings by income, race, and ethnicity of applicant.

Sources: FFIEC, Home Mortgage Disclosure Act (HMDA), 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.<sup>12</sup> Compared to other regions, the San Joaquin Valley had rates of subprime lending that were equal to or greater than the statewide average among Asians, African Americans, Latinos, and Whites during the lead up to the housing market crash of 2008.

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 correspond 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. On the run up to the recent 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.

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<sup>12</sup> California Department of Housing and Community Development. (2012). Analysis of Impediments to Fair Housing. Available at: [http://www.hcd.ca.gov/hpd/hrc/rep/fed/state\\_of\\_ca\\_analysis\\_of\\_impediments\\_full%20report0912.pdf](http://www.hcd.ca.gov/hpd/hrc/rep/fed/state_of_ca_analysis_of_impediments_full%20report0912.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.

Table 33 identifies the number of fair housing complaints filed with the FHEO between January 1, 2014 and August 28, 2019. According to these data, there were 79 complaints filed within San Joaquin County during this time period, 41 of which were filed with regard to violations that occurred within the City of Stockton. Within both areas, the FHEO dismissed the majority of complaints for lack of cause, while other complaints were dismissed due to: failure to cooperate on behalf of the complainant, the office was unable to locate the complainant, lack of jurisdiction, or the complaint was withdrawn without or after resolution. For example, in Stockton, 75.6 percent of cases filed during this period were dismissed for no cause, while 4.9 percent were withdrawn without resolutions. This left a total of eight cases, or 19.5 percent, that were conciliated or settled, six of which resulted in monetary settlements, with the smallest being \$200 and the largest being \$5,000.

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, CA.

**Table 33: FHEO Fair Housing Complaints by Resolution Type, 2014-YTD 2019**

<b>City of Stockton</b>								
<b>Resolution</b>	<b>Year Resolved</b>						<b>Total, All Years</b>	<b>Percent of Total</b>
	2014	2015	2016	2017	2018	YTD 2019		
Conciliated/Settled	2	0	0	4	1	1	8	19.5%
No Cause	4	2	9	7	8	1	31	75.8%
Withdrawal Without Resolution	0	1	0	1	0	0	2	4.9%
<b>Total, All</b>	<b>6</b>	<b>3</b>	<b>9</b>	<b>12</b>	<b>9</b>	<b>2</b>	<b>41</b>	<b>100%</b>

<b>San Joaquin County</b>								
<b>Resolution</b>	<b>Year Resolved</b>						<b>Total, All Years</b>	<b>Percent of Total</b>
	2014	2015	2016	2017	2018	YTD 2019		
Conciliated/Settled	3	2	2	6	3	1	17	21.5%
No Cause	6	5	11	13	12	5	52	65.8%
Unable to Locate Complainant	0	0	1	0	0	0	1	1.3%
Lack of Jurisdiction	0	1	0	0	1	0	2	2.5%
Failure to Cooperate	0	1	0	0	0	0	1	1.3%
Withdrawal Without Resolution	0	1	0	1	0	0	2	2.5%
Withdrawal After Resolution	0	2	0	2	0	0	4	5.1%
<b>Total, All</b>	<b>9</b>	<b>12</b>	<b>14</b>	<b>22</b>	<b>16</b>	<b>6</b>	<b>79</b>	<b>100%</b>

Sources: HUD, Office of Fair Housing and Equal Opportunity, 2019; BAE, 2019.

Table 34 identifies the number of fair housing complaints filed for incidents in Stockton between 2014 and 2019, as reported by the DFEH. The data are broken down to identify the primary protected class(es) affected, the discriminatory act(s) taken, as well as the method of resolution for each case. Note that each case may impact more than one protected class and involve more than one discriminatory practice. According to these data, there were 41 fair housing complaints filed with the DFEH between 2014 and 2019. Of those, 44.4 percent involved a disabled person. The race/color, source of income, and gender of the complainant were each involved in 9.3 percent of the cases. An additional 7.4 percent were based on the familial status of the complainant. In terms of the cited discriminatory action or practice, nearly 25 percent of complaints filed involved the denial of rental, lease, or sale, and another 25 percent involved the denial of a reasonable accommodation. An additional 13 percent involved evictions, while 11.7 percent involved harassment and another 11.7 percent involved the subjection to discriminatory statements and/or advertisements. In terms of complaint resolution, 51.2 percent of the filed complaints were investigated and dismissed due to a lack of evidence, while 2.4 percent were dismissed because of an absence of a basis to proceed and another 2.4 percent were dismissed due to a resolution between parties. An additional 22 percent had no cause determinations, while 17.1 percent were resolved with settlements.

**Table 34: DFEH Fair Housing Complaints by Basis, Discriminatory Practice, and Resolution Type, 2014-YTD 2019**

Basis Type (a)	Year Filed						Total, All Years	Percent of Total
	2014	2015	2016	2017	2018	YTD 2019		
Race/Color	2	0	0	2	0	1	5	9.3%
Source of Income	1	1	1	0	1	1	5	9.3%
Disability	4	3	9	5	2	1	24	44.4%
Familial Status	1	0	0	2	0	1	4	7.4%
National Origin	2	1	0	0	0	0	3	5.6%
Sex - Pregnancy	0	0	1	0	0	0	1	1.9%
Sex - Gender	0	2	1	1	0	1	5	9.3%
Sex - Gender Identity	0	0	1	0	0	0	1	1.9%
Sexual Orientation	0	0	1	2	0	0	3	5.6%
Association with a member of a protected class	0	0	0	1	0	0	1	1.9%
Sexual Harassment	0	0	0	0	0	1	1	1.9%
Other	0	0	0	0	1	0	1	1.9%
<b>Total, All Complaints</b>	<b>10</b>	<b>7</b>	<b>14</b>	<b>13</b>	<b>4</b>	<b>6</b>	<b>54</b>	<b>100%</b>
<b>Discriminatory Practice (a)</b>								
Harassed	5	1	2	1	0	0	9	11.7%
Evicted	3	1	1	3	1	1	10	13.0%
Denied rental/lease/sale	4	3	7	5	0	0	19	24.7%
Denied reasonable accommodation	4	2	9	3	1	0	19	24.7%
Denied reasonable accommodation for a disability or medical condition	0	0	0	0	1	2	3	3.9%
Subjected to discriminatory statements/advertisements	3	0	3	3	0	0	9	11.7%
Denied equal terms and conditions	1	1	0	0	0	2	4	5.2%
Subjected to restrictive/covenant	0	0	1	0	0	0	1	1.3%
Other	0	0	1	1	1	0	3	3.9%
<b>Total, All Practices</b>	<b>20</b>	<b>8</b>	<b>24</b>	<b>16</b>	<b>4</b>	<b>5</b>	<b>77</b>	<b>100%</b>
<b>Resolution</b>								
Complaint Withdrawn by Complainant Without Resolution	0	0	0	1	0	0	1	2.4%
Conciliation/Settlement Successful	0	0	0	0	1	0	1	2.4%
Investigated and Dismissed - Insufficient Evidence	5	6	9	1	0	0	21	51.2%
Investigated and Dismissed - No Basis to Proceed	1	0	0	0	0	0	1	2.4%
Investigated and Dismissed - Withdrawn - Resolved between parties	1	0	0	0	0	0	1	2.4%
No Cause Determination	0	0	0	7	1	1	9	22.0%
Settlement - Settled by Enforcement	1	0	0	1	0	1	3	7.3%
Settlement - Settled by Mediation - Mandatory 1038	0	0	1	0	0	0	1	2.4%
Settlement - Settled by Mediation - Voluntary	0	0	2	1	0	0	3	7.3%
<b>Total, All Resolutions</b>	<b>8</b>	<b>6</b>	<b>12</b>	<b>11</b>	<b>2</b>	<b>2</b>	<b>41</b>	<b>100%</b>

Note:

(a) Each complaint may involve more than one basis type or discriminatory practices, but there is only one resolution per complaint.

Sources: California Department of Fair Employment and Housing, 2019; BAE, 2019.

### 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. Table 35 reports the number of hate crimes reported to have occurred in the City of Stockton between 2012 and 2017. On average, the City of Stockton experienced between one and two crimes reportedly motivated by a demonstrated bias based on a person's race or ethnicity or religion each year, while the city experienced less than one crime per year motivated by a demonstrated bias towards a person's sexual orientation, disability, or gender identity. There were no reported crimes based on a demonstrated bias towards a person's gender in the City of Stockton during this time-period. On a standardized basis, this equals an average rate of between 0.00 and 0.53 cases per 100,000 residents. To put this in perspective, there were 843 reported hate crimes in California in 2013, which equals a rate of 2.77 crimes per 100,000 residents, indicating that on the whole, the Stockton community has a below average rate of hate crime.

**Table 35: Hate Crime Statistics, Stockton, 2012-2017**

Year	Number of Incidents per Bias Motivation					
	Race/ Ethnicity	Religion	Sexual Orientation	Disability	Gender	Gender Identity
2013	1	0	1	0	0	0
2014	2	1	0	0	0	0
2015	1	1	1	0	0	1
2016	2	0	0	1	0	0
2017	2	3	1	0	0	0
<b>5-Year Average</b>	<b>1.6</b>	<b>1.0</b>	<b>0.6</b>	<b>0.2</b>	<b>0.0</b>	<b>0.2</b>

Sources: Federal Bureau of Investigation (FBI), Uniform Crime Reporting Program, 2018; BAE, 2019.

## **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 the SJFH annual performance reports for fiscal years 2015-2016 through 2018-2019. According to this data, SJFH conducts ongoing advertising and outreach via an assortment of local news outlets, including local access television channels 26 and 97, as well as the Stockton Record, among others. Additionally, SJFH conducts outreach via social media including Facebook, Twitter and Instagram. They distribute fliers to an assortment of locations located throughout the city, including municipal offices, rental offices and associations, local educational institutions, and community-based organizations, such as the Annunciation Church. SJFH also conducts outreach via community events or SJFH sponsored community seminars. For example, during the 2018-2019 fiscal year, SJFH participated in the STAND's Summer Wellness Festival, numerous HACSJ Resident Fairs, and hosted three Landlord and Tenant Trainings/Workshops.



**Table 36: San Joaquin Fair Housing Accomplishments, FY 16-17 to FY 18-19**

	FY 2016-2017	FY 2017-2018	FY 2018-2019
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 Concilio Delta College Cal Human Dev. Corp. SJC Mental Health Services Annunciation Church Boys and Girls Club Comm. Partners for Families	Same	Same
Individuals Receiving Services	6,047	7,261	9,032
Formal Cases/Individuals Served	271 / 871	320 / 926	368 / 1,161
Formal Cases Resolved	159	196	244

Sources: San Joaquin Fair Housing, 2019; BAE, 2019.

In addition to providing outreach and education regarding fair housing issues, SHFH provides a variety of services to individuals and organizations. In fiscal year 2016-2017, the most recent year for which comparable data is available, SJFH provided direct services, including initial consultations, as well as addressing telephone and in-office inquiries to 6,047 individuals living in the City of Stockton. This number increased to 9,032 as of the end of fiscal year 2018-2019. Similarly, the number of cases formally opened by SJFH also increased during this time frame from 271 cases representing 871 individuals in fiscal year 2016-2017 to 368 cases representing 1,161 individuals in fiscal year 2018-2019. Of the formal cases opened by SJFH in fiscal year 59 percent were resolved that same year. By the end of fiscal year

2018-2019, SJFH's resolution rate was 66 percent, despite the increase in the number of cases opened. According to Robert Munoz, Executive Director of SJFH, the increase in the number of people receiving services and the number of cases opened is largely due to an increase in evictions of lower income tenant from older more affordable units which were bought by investors in the wake of the housing market collapse of 2008. As the housing market in Stockton improves, many property owners have begun to renovate these units and rent them at market rate rents that are above what the existing tenants can afford.

As shown in Table 37, the overwhelming majority of cases in fiscal year 2018-2019 affected households in the extremely low-, very-low, and low-income categories. Only 14.4 percent of cases were in the moderate-income category. For additional data regarding the breakdown of SJFH cases by race, ethnicity, and special needs group, please refer to Table 37.

**Table 37: San Joaquin Fair Housing, Client Characteristics, FY 2018-2019**

<b>Racial Group (Persons)</b>	<b>Number of Cases</b>	<b>Percent of Total</b>
White	88	23.9%
Black/African American	98	26.6%
American Indian and Alaska Native	5	1.4%
Asian	8	2.2%
Native Hawaiian and Other Pacific Islander	3	0.8%
Two or More Races	6	1.6%
Other Multiracial or Did Not Report	160	43.5%
<b>Total, All</b>	<b>368</b>	<b>100.0%</b>
<b>Ethnic Group (Persons)</b>		
Hispanic or Latino	160	43.5%
Not Hispanic or Latino	208	56.5%
<b>Total, All</b>	<b>368</b>	<b>100.0%</b>
<b>Special Needs Group</b>		
Disabled HH Member	79	21.8%
Senior Headed Household	18	5.0%
Female Headed Household	182	50.1%
Five or More Member Household	81	22.3%
UD	3	0.8%
Veteran HH Member	0	0.0%
Homeless	0	0.0%
<b>Total, All</b>	<b>363</b>	<b>100.0%</b>
<b>Income Category (Households)</b>		
Extremely Low -Income (<30% AMI)	112	30.4%
Very Low -Income (30%-50% AMI)	119	32.3%
Low -Income (50%-80% AMI)	84	22.8%
Moderate-Income (>80% AMI)	53	14.4%
<b>Total, All</b>	<b>368</b>	<b>100.0%</b>

Sources: San Joaquin Fair Housing, 2019; BAE, 2019.

### 4.3 – Evaluation of 2015-2019 AI Report Actions

The following section details the City's accomplishments and efforts to further fair housing choice within the City of Stockton and San Joaquin County. Note that actions recommended in the 2015-2020 AI were developed for joint implementation by jurisdictions throughout San Joaquin County, including the County itself, as well as the City of Stockton. The accomplishments and efforts described below for each action are based on those reported in the Comprehensive Annual Performance and Evaluation Reports submitted by the City of Stockton as part of the monitoring and evaluation process associated with the 2015-2020 Consolidated Plan. Additional information was provided by City staff, as appropriate.

#### *General Recommendations*

**Action 1:** Use the Consolidated Plan and AI as mechanisms to increase awareness and participation in fair housing issues. The City should utilize the Consolidated Plan and AI adoption and implementation processes to raise community awareness of the identified barriers to fair housing choice. Hearings and public meetings associated with the planning and implementation should be advertised in the media and members of the public should be invited to participate and provide substantive input.

**Response:** The City greatly expanded public outreach efforts associated with the 2020-2025 Consolidated Plan and AI update. Public outreach efforts included one-on-one consultations with key agencies and organizations throughout Stockton and San Joaquin County, including the CoC, public and assisted housing providers and developers, an assortment of government agencies, as well as private and public health, mental health, and social service agencies. Additionally, the City held four focus group meetings with key stakeholders including some of the organizations that participated in one-on-one consultations in addition to local chambers of commerce, business owners, professional organizations, and members of the public. The focus group topics included: housing, business development, economic development, and central city issues. These meetings were open to the public and advertised in the local newspaper. In total, the City consulted with 25 organization one-on-one, with an additional 38 organizations or community members participating in one or more focus groups. Some organizations participated in both the one-on-one consultations and focus group discussions. In total, the City consulted 58 unique organizations or members of the public.

**Action 2:** Periodically monitor progress toward implementation of the AI recommendations. City staff should utilize the existing Consolidated Plan reporting process to consistently monitor and track the progress made toward implementation. This could also include an annual report on the actions taken by area fair housing service providers, including an inventory of the services provided, the number of clients served, the results of fair housing testing, and a breakdown of fair housing cases by type, including evaluation of key client characteristics.

**Response:** The City of Stockton uses the Comprehensive Annual Progress Report (CAPR) to track progress made towards implementation of AI recommendations. Additionally, SJFH issues quarterly and annual reports which track services provided, the number of clients served, and key client characteristics.

#### ***Access to Information***

**Action 3:** Maintain links on appropriate pages of the City's website that direct visitors to housing services and resources, fair housing information, and consumer information. Ensure that information regarding the housing services provided by the City and its partners, including SJFH, is available at designated locations throughout the community, including but not limited to City offices, public libraries, community and civic centers, and other public facilities, particularly those public offices frequented by members of vulnerable populations, such as the elderly, disabled, minorities, and low-income households.

**Response:** The City has established links on its website 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 Hall, County offices, public libraries, CalWorks, Delta College, El Concillio, and rental property associations, just to name a few.

**Action 4:** Conduct annual trainings, seminars, and information sessions with key City staff who administer and oversee housing programs and code enforcement activities to ensure that these staff are able to accurately provide guidance and referrals with regard to 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 5:** To the extent possible with limited funding, support SJFH in expanding access to its services by increasing the number of hours the office is open and the number of hours that the phones are answered.

**Response:** With continued support from the City's annual allocations of Community Development Block Grant (CDBG) funds, SJFH has expanded the number of people receiving fair housing services. In fiscal year 2016-2017, the most recent year for which comparable data is available, SJFH provided direct services, including initial consultations, as well as addressing telephone and in-office inquiries to 6,047 individuals living in the City of Stockton. This number increased to 9,032 as of the end of fiscal year 2018-2019. Similarly, the number of cases formally opened by SJFH also increased during this time frame from 271 cases representing 871 individuals in fiscal year 2016-2017 to 368 cases

representing 1,161 individuals in fiscal year 2018-2019. Of the formal cases opened by SJFH in fiscal year 59 percent were resolved that same year. By the end of fiscal year 2018-2019, SJFH's resolution rate was 66 percent, despite the increase in the number of cases opened.

**Action 6:** Continue to support and, where possible, expand programs that provide 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. This may include providing support to SJFH, as well as other agencies and organizations, including providing funding to continue and expand existing city programs.

**Response:** The City continues to support SJFH through annual allocations of Community Development Block Grant (CDBG) funds; however, given the current reduction in funding provided to the City through the Community Planning and Development (CPD) grant programs, the City has not been able to allocate significant additional funds to SJFH to expand their services. Nonetheless, SJFH has partnered with fair housing service providers in Stanislaus and Sacramento Counties to try and expand the availability of fair housing education and outreach services.

#### *Fair Housing Services and Outreach*

**Action 7:** Collaborate with other local jurisdictions to explore additional funding sources that may be leveraged to develop and maintain a program for comprehensive fair housing testing. This should include a dialogue intended to identify the most appropriate provider of these services (e.g., SJFH), as well as to determine ways in which each jurisdiction can contribute, so as to preserve and expand the capacity of organization that administers the testing program.

**Response:** SJFH and the jurisdictions which support it continue to explore funding sources to allow a comprehensive fair housing testing program.

**Action 8:** Maintain and intensify code enforcement efforts focused on identifying substandard housing units and ensure, to the extent practicable given available resources, supplemental funding for lower-income households necessary to facilitate prompt and satisfactory remediation of identified issues and avoid displacement. Efforts should be coordinated with other appropriate code and law enforcement activities, as well as the provision of assorted supportive and fair housing services.

**Response:** Code Enforcement efforts have also continued. The implementation of a Rental Inspection Ordinance has continued in an effort to ensure that rental housing is maintained to the required standards.

**Action 9:** Maintain and expand support necessary for fair housing service providers to conduct fair housing trainings, workshops, and information sessions for residents, property managers and landlords, providing appropriate translation services where possible and necessary.

**Response:** The City continues to support SJFH through annual allocations of Community Development Block Grant (CDBG) funds and relies on SJFH to provide workshops and information sessions in a variety of venues. In addition, the City of Stockton maintains links to SJFH and other housing organizations, such as the HACSI, on its webpage. City staff also provide referrals on a case-by-case basis and assist with advertising outreach and educational events.

#### *Home Purchase, Lending, and Foreclosure*

**Action 10:** Work with financial institutions to encourage marketing of financial services to all segments of the community. For example, lenders in the subprime market were effective in utilizing community resources, local “cultural brokers,” and affinity group marketing strategies, which indicates that lenders operating in the prime market may also benefit from similar marketing approaches, which can improve access to financing for lower-income and minority populations.

**Response:** The City continues to work with financial institutions through support provided to fair housing advocate groups, such as SJFH, to improve access to financing for lower-income and minority homebuyers.

#### *Public Policies and Programs*

**Action 11:** Leverage the ongoing comprehensive amendment process to address potential barriers to affordable and fair housing, including those identified in the Housing Element. This may also include policies intended to encourage additional affordable housing development in areas of high opportunity, such as moderate- and above moderate-income neighborhoods, though policies should not be crafted in such a way as to discourage affordable housing in any location area otherwise deemed appropriate for residential uses.

**Response:** In the Fall of 2019, Community Development Department staff initiated a comprehensive update of the Development Code and citywide rezoning to be consistent with the City’s Envision Stockton 2040 General Plan, which was adopted in December 2018. The 2040 General Plan represents a significant shift away from the City’s historical pattern of periphery development to urban infill development and redevelopment by allowing for more flexible development standards and higher permitted densities in more urban areas of the city. These code changes will allow the City to implement not just procedural changes, but to update and streamline outdated land use practices.

**Action 12:** Pursue a comprehensive update of the City's development impact fees, including the Capital Facilities Fees and Community Development Department fees to ensure that the fees charged are commensurate with the impact and sufficient to offset departmental costs.

**Response:** The City is concluding a service fee analysis to identify the costs of City services among the various departments. The analysis will identify best practices from neighboring jurisdictions to continue the improvements being made in the processing of development applications.

**Action 13:** Continue to comply with applicable antidiscrimination requirements, including, but not limited to, all applicable federal regulations associated with the use of CPD grant funds under the CDBG, HOME, and ESG programs.

**Response:** The City of Stockton complies with all antidiscrimination requirements as identified by the applicable legislation and HUD regulations.

## SECTION 5 – RECOMMENDED ACTIONS

The purpose of the AI is to identify barriers to fair housing choice, identify recommended actions that may be pursued to facilitate the resolution of those barriers, and to monitor progress in achieving the recommendations adopted during the prior cycle. The AI finds an ongoing need to address fair housing issues in the City of Stockton, given general concerns regarding affordability, access, segregation and isolation, potential discrimination, and a continued need for outreach and education regarding fair housing rights and obligations.

### *General Recommendations*

**Action 1:** Use the Consolidated Plan and AI as mechanisms to increase awareness and participation in fair housing issues. The City should utilize the Consolidated Plan and AI adoption and implementation processes to raise community awareness of the identified barriers to fair housing choice. Hearings and public meetings associated with the planning and implementation should be advertised in the media and members of the public should be invited to participate and provide substantive input.

**Action 2:** Periodically monitor progress toward implementation of the AI recommendations. City staff should utilize the existing Consolidated Plan reporting process to consistently monitor and track the progress made toward implementation. This could also include an annual report on the actions taken by area fair housing service providers, including an inventory of the services provided, the number of clients served, the results of fair housing testing, and a breakdown of fair housing cases by type, including evaluation of key client characteristics.

### *Access to Information*

**Action 3:** Maintain links on appropriate pages of the City's website that direct visitors to housing services and resources, fair housing information, and consumer information. Ensure that information regarding the housing services provided by the City and its partners, including SJFH, is available at designated locations throughout the community, including but not limited to City offices, public libraries, community and civic centers, and other public facilities, particularly those public offices frequented by members of vulnerable populations, such as the elderly, disabled, minorities, and low-income households.

**Action 4:** Conduct annual trainings, seminars, and information sessions with key City staff who administer and oversee housing programs and code enforcement activities to ensure that these staff are able to accurately provide guidance and referrals with regard to fair housing and landlord-tenant issues.



**Action 5:** To the extent possible with limited funding, support SJFH in expanding access to its services by increasing the number of hours the office is open and the number of hours that the phones are answered.

**Action 6:** Continue to support and, where possible, expand programs that provide 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. This may include providing support to SJFH, as well as other agencies and organizations, including providing funding to continue and expand existing city programs.

#### ***Fair Housing Services and Outreach***

**Action 7:** Collaborate with other local jurisdictions to explore additional funding sources that may be leveraged to develop and maintain a program for comprehensive fair housing testing. This should include a dialogue intended to identify the most appropriate provider of these services (e.g., SJFH), as well as to determine ways in which each jurisdiction can contribute, so as to preserve and expand the capacity of organization that administers the testing program.

**Action 8:** Maintain and intensify code enforcement efforts focused on identifying substandard housing units and ensure, to the extent practicable given available resources, supplemental funding for lower-income households necessary to facilitate prompt and satisfactory remediation of identified issues and avoid displacement. Efforts should be coordinated with other appropriate code and law enforcement activities, as well as the provision of assorted supportive and fair housing services.

**Action 8:** Maintain and expand support necessary for fair housing service providers to conduct fair housing trainings, workshops, and information sessions for residents, property managers and landlords, providing appropriate translation services where possible and necessary.

#### ***Home Purchase, Lending, and Foreclosure***

**Action 9:** Work with financial institutions to encourage marketing of financial services to all segments of the community. For example, lenders in the subprime market were effective in utilizing community resources, local “cultural brokers,” and affinity group marketing strategies, which indicates that lenders operating in the prime market may also benefit from similar marketing approaches, which can improve access to financing for lower-income and minority populations.

#### ***Public Policies and Programs***

**Action 9:** Leverage the ongoing comprehensive amendment process to address potential barriers to affordable and fair housing, including those identified in the Housing Element. This may also include policies intended to encourage additional affordable housing development in areas of high opportunity, such as moderate- and above moderate-income neighborhoods, though policies should not be crafted in such a way as to discourage affordable housing in any location area otherwise deemed appropriate for residential uses.

**Action 10:** Pursue a comprehensive update of the City's development impact fees, including the Capital Facilities Fees and Community Development Department fees to ensure that the fees charged are commensurate with the impact and sufficient to offset departmental costs.

**Action 11:** Continue to comply with applicable antidiscrimination requirements, including, but not limited to, all applicable federal regulations associated with the use of CPD grant funds under the CDBG, HOME, and ESG programs

**Action 12:** Work with local and regional public transportation service providers to expand and enhance access connections between lower income neighborhoods such as south Stockton employment centers not well served by public transit.

**Action 13:** Support efforts to rehabilitate or newly construct smaller studio- and one-bedroom units which are affordable to lower-income households

**Action 14:** Work with the Central Valley Low Income Housing Corporation and the Housing Authority of San Joaquin County to support and enhance programs to incentivize acceptance of Housing Choice Vouchers.

**Action 15:** Explore the need for and feasibility of policies which protect renters from eviction or retaliatory measures from landlords (i.e., retaliation for code enforcement complaints, particularly for undocumented renters).

## 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 City of Stockton 2020-2025 Consolidated Plan and AI:

- A.G. Spanos Company
- Arnaiz Development Company
- Bay Area Home Options
- Building Industry Association of the Greater Valley
- Catholic Charities of the Diocese of Stockton
- Conway Homes Resident Council President – Pandora Crowder
- Financial Center Credit Union
- Housing Authority of the County of San Joaquin
- San Joaquin County Commission on Aging
- San Joaquin County Economic Development
- San Joaquin County Human Services Agency
- San Joaquin Fair Housing, Inc.
- San Joaquin Partnership
- Sierra Vista Resident Council President – Georgia Brownlee
- STAND Affordable Housing
- Visionary Home Builders
- Fathers and Families of San Joaquin County

Resolution No. 2020-04-28-1502

## STOCKTON CITY COUNCIL

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**RESOLUTION APPROVING AND ADOPTING THE 2020-2025 CONSOLIDATED PLAN AND THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT, HOME INVESTMENT PARTNERSHIPS, AND EMERGENCY SOLUTION GRANT PROGRAMS AND AUTHORIZING THE CITY MANAGER TO EXECUTE ALL DOCUMENTS AND FORWARD THEM TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

Title I of the Housing and Community Development Act of 1974 ("Act") finds and declares that the future welfare of the nation and the well-being of its citizens depends upon establishing and maintaining viable urban communities as social, economic, and political entities and requires systematic and sustained action by federal, state, and local governments to eliminate blight and conserve and renew older urban areas in order to improve the living conditions and environment of low and moderate income families and to develop new centers of population growth and economic activity; and

Of utmost importance to the welfare of the community and a vital concern under the Act with regard to persons of low and moderate income is eliminating slums and blight, preventing blighting influence, and preventing the deterioration of private property, neighborhoods, and community facilities; and

The elimination of conditions that are detrimental to the health, safety, and public welfare through code enforcement, acquisition, demolition, rehabilitation assistance, community development, and related activities are vital concerns to the City of Stockton ("City"); and

In compliance with 24 CFR, Parts 91, 92, 570, and 576, which address the Consolidated Submission for Community Planning and Development Programs, the City prepared a Consolidated Plan for Community Development Block Grant ("CDBG"), Home Investment Partnerships ("HOME"), and Emergency Solution Grant ("ESG") Programs; and

The Consolidated Plan is the City's five-year planning document for CDBG, HOME and ESG funds, which provides an assessment of local housing conditions and a long-term strategy for addressing community needs; and

The Consolidated Plan regulations (24 CFR 91) require each state and local government to submit a certification that it is affirmatively furthering fair housing which means that it will conduct an analysis of impediments to fair housing choice and take appropriate actions to overcome the effects of impediments identified through that analysis; and

On February 17, 2020, a notice that the 2020-2025 Consolidated Plan and the Analysis of Impediments to Fair Housing Choice were available for review was published in The Record, the local newspaper of general circulation, and posted in public places, thereby beginning a 30-day period for citizens to review and comment on the draft plans; and

On March 27, 2020, a notice that the 2020-2025 Consolidated Plan's public comment review period was extended, as two sections were added in response to new HUD requirements – Broadband Access and Natural Hazards Resilience – was published in The Record, the local newspaper of general circulation, and posted in public places, thereby extending the 30-day period for citizens to review and comment on the draft plans; and

The City's application for funds under the CDBG, HOME, and ESG Programs, which include the Consolidated Plan, Analysis of Impediments, and the One-Year Action Plan, must be filed with the United States Department of Housing and Urban Development ("HUD") on or before May 15, 2020; and

On April 28, 2020, the City Council held a public hearing during which staff presented an overview of the elements of the proposed Consolidated Plan, and Analysis of Impediments to Fair Housing Choice, and citizens were provided an opportunity to comment and all persons requesting to be heard were heard and their comments considered; now, therefore,

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF STOCKTON, AS FOLLOWS:

1. The City Council hereby approves the 2020-2025 Consolidated Plan, and Analysis of Impediments to Fair Housing Choice for the CDBG, HOME, and ESG Programs, all of which are on file with the Office of the City Clerk and the Economic Development Department.

2. The City Manager is hereby authorized to take such action as necessary and appropriate to file the 2020-2025 Consolidated Plan and Analysis of Impediments to Fair Housing Choice.

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3. The City Council hereby assures the United States of America and the Secretary of HUD that the City, as the applicant, shall:

a. Fully comply with the HUD regulations effectuated by Title VI of the Civil Rights Act of 1964.

b. Fully comply with the federal labor standards imposed under Title VII of the Housing and Community Development Act of 1977.

The City Manager is hereby authorized to take whatever actions are necessary and appropriate to carry out the purpose and intent of this Resolution.

PASSED, APPROVED, and ADOPTED April 28, 2020.



ATTEST:

ELIZA R. GARZA, CMC  
City Clerk of the City of Stockton

  
MICHAEL D. TUBBS  
Mayor of the City of Stockton



## City of Stockton

### Legislation Text

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**File #:** 20-6317, **Version:** 1

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**PUBLIC HEARING: 2020-2025 CONSOLIDATED PLAN AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR THE CITY OF STOCKTON FEDERAL ENTITLEMENT PROGRAMS, COMMUNITY DEVELOPMENT BLOCK GRANT, HOME INVESTMENT PARTNERSHIPS, AND EMERGENCY SOLUTION GRANT PROGRAMS**

#### RECOMMENDATION

It is recommended that after the public hearing, the City Council adopt a resolution:

- 1) Approving the 2020-2025 Consolidated Plan and Analysis of Impediments to Fair Housing Choice with any modifications deemed appropriate.
- 2) Authorizing the City Manager, or designee, to execute all documents and forward them to the U.S. Department of Housing and Urban Development, and to take whatever actions are necessary and appropriate to carry out the purpose and intent of the resolution

#### Summary

The U.S. Department of Housing and Urban Development (HUD) requires that jurisdictions prepare a Five-Year Consolidated Plan (Con Plan) and Analysis of Impediments to Fair Housing Choice (A.I.) every five years to receive federal Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Emergency Solution Grant (ESG) grant funding.

The purpose of the Con Plan is to create a five-year plan to assist in the development of a viable community that provides decent, affordable housing, a suitable living environment, and expanded economic opportunities for persons of low to moderate-income.

The A.I. includes a review of public and private policies, practices, and procedures that influence housing choice and may expose certain population groups to housing discrimination.

As part of this process, the City Council must hold a public hearing to solicit comments from the public regarding the proposed FY 2020-2025 Con Plan identified priority needs, goals, and objectives.

#### DISCUSSION

##### Background

To receive federal CDBG, HOME, and ESG funds, HUD requires local jurisdictions to prepare a five-year Con Plan and A.I. report. The Con Plan identifies the priority needs within a community. It establishes the goals and objectives that the jurisdiction hopes to accomplish during the five years

using the federal funds. It provides an assessment of local housing and community development needs, an analysis of current housing conditions, and a five-year strategy for addressing the identified needs. The last Con Plan was adopted in 2015 and was the basis for Stockton's 2020-2025 Consolidated Plan, with the needs assessment data, market analysis, and priorities updated to reflect current conditions.

The A.I. includes an analysis of public and private policies, practices, and procedures that influence housing choice within Stockton and recommendations to address fair housing issues for the 2020-2025 time period. The report found that fair housing complaints submitted in Stockton fell into five primary categories: disabled persons, denial of reasonable accommodations; race and source of income complaints; and landlord-tenant disputes.

#### Community Input and Funding Process

The process of developing the Con Plan and A.I. began in September 2019 with the placement of a public notice in The Record notifying the public of a Community Development Committee (CDC) meeting to discuss community needs and the start of the application period for CDBG and ESG funds. Notices were emailed to approximately 50 agencies, organizations, and interested citizens, posted on the City's website and shared via social media.

In addition to discussions at the CDC meetings, BAE Urban Economics, the firm that prepared the Con Plan and A.I., also contacted various Stockton stakeholders, nonprofit organizations, and agencies to obtain input into the plan. BAE was selected to prepare the Con Plan and the A.I. through a Request for Proposal (RFP) process. BAE's proposal was the most responsive to the City's needs and demonstrated an understanding of meeting HUD's requirements for preparing a Con Plan and an A.I. report. Council approved BAE's contract on January 15, 2019 (Motion 2019-18-5073).

#### Present Situation

### **2020-2025 CONSOLIDATED PLAN AND ANALYSIS OF IMPEDIMENTS**

The draft 2020-2025 Con Plan is based, in part, on the 2015-2020 Con Plan. The objectives, strategies, and goals were updated to reflect current housing conditions, changes in funding, and to reflect the current needs identified by the public.

The objectives of the updated Con Plan include:

- Provide housing and services for the City's homeless population, including homelessness prevention. Increase and maintain transitional housing opportunities. Expand housing first model to provide permanent housing with intense onsite wrap-around services.
- Preserve, improve, and expand the supply of decent, affordable housing for low-income households. Increase the supply of affordable housing stock, both rental and homeownership.
- Provide supportive services to meet the needs of the City's non-homeless, special needs populations. Improve community health care, including primary and specialty care. Support



and expand programs and opportunities that engage seniors as well as youth.

- Promote economic development activities that create, attract, and retain jobs and promote economic activity and vitality, especially those that provide economic opportunities for low-income persons.
- Ensure the provision of high-quality public services to support ongoing community development, including the provision of funding fair housing services, among other activities.

The primary emphasis under the 2020-2025 Con Plan is to increase and expand affordable housing opportunities for homeless individuals and families, as well as for extremely-low and very low-income households, through local and regional collaborations, to promote economic opportunities for job readiness for low-income persons, and invest in economic development programs.

The goal of the Con Plan during the next five years is to fund the development of 450 affordable housing units; provide increased funding opportunities to homeless shelters that will provide accommodation and services to more than 15,000 homeless individuals and families; fund homeless prevention, rapid re-housing programs; and expand economic development activities that will help create new jobs and support entrepreneurship.

BAE also prepared the HUD required A.I. report. This report analyzes conditions in the City that may expose certain population groups to housing discrimination and make recommendations on actions that can be implemented to improve access to housing choice.

The A.I. recommended City actions include: providing links to San Joaquin Fair Housing and other housing services on the City's website; work with the San Joaquin Fair Housing agency to increase awareness of the rights of persons with disabilities, ADA issues, and information on rights to reasonable accommodation; continue to comply with HUD anti-discrimination requirements, including all federal regulations as required by the CDBG and HOME programs; support efforts to rehabilitate or construct smaller studio and one-bedroom units that are affordable to low-income households; continue to support and expand first-time homebuyer counseling and education programs; and, support education on tenant rights and responsibilities for families entering or re-entering the rental market, such as former homeless households.

#### **2020-2025 CONSOLIDATED PLAN**

The following is an overview of each of the funding sources and a brief summary of recommended funding for each program.

##### Community Development Block Grant Program

CDBG is a flexible program that provides communities funding to address a wide range of unique community development needs that benefit low-income residents. Cities with more than 50,000 people and counties with a population of more than 200,000 are eligible to receive this funding from the federal government.

Each year, HUD determines the CDBG allocation using a formula that considers the total population,

the number of persons in poverty, housing overcrowding, and the age of the housing stock within the jurisdiction.

CDBG funds are used for a wide range of activities, including:

- Rehabilitation of residential and commercial property
- Demolition
- Public facilities and improvements
- Economic development
- Public services (up to 15% annually)

The primary eligibility requirement for each activity is that it must benefit low-income persons. HUD defines low-income as a household that is at or below 80% of the area median income (AMI), which in Stockton is an annual income of \$56,000 for a family of four.

A jurisdiction may spend up to 20% of its entitlement and program income on administrative costs, which are the costs associated with daily operations, such as staff costs to administer programs, materials and supplies, training, and consultant services. CDBG Program Delivery includes costs attributed directly to projects, as well as project delivery hard costs, such as obtaining title reports and appraisals.

#### HOME Investment Partnership Program

HOME funds must be used by local governments to create affordable housing for low-income households. HOME funds are awarded annually as formula grants to participating jurisdictions. The program allows states and local governments to use HOME funds for grants, direct loans, loan guarantees, or other forms of credit enhancement, homebuyer programs, homeowner rehabilitation programs, rental housing programs, and tenant-based rental assistance. The incomes of households receiving HOME funds must not exceed 80% of AMI.

HUD regulations require that 15% of the City's HOME allocation be reserved for Community Housing Development Organizations (CHDO), which are community-based organizations that develop affordable housing. The City currently has two certified CHDOs. The City utilizes a HUD checklist to ensure that the CHDO requirements are met before certifying an organization as a CHDO.

A jurisdiction may spend up to 10% of its entitlement and program income on administrative costs. Housing Program Delivery includes costs attributed to specific housing projects.

#### Emergency Solutions Grant Program

The ESG program provides funding to emergency shelters, homeless service providers, homeless prevention, and rehousing programs.

Eligible activities are street outreach, emergency shelters, homelessness prevention, and rehousing assistance. Funds may also be used to provide the required Homeless Management Information System (HMIS) and for administrative activities. The emphasis of the ESG program is to help people regain stability with placement in permanent housing after experiencing a housing crisis and/or

homelessness; therefore, HUD limits the amount of a jurisdiction's ESG grant that can be used for assistance to emergency shelters to not more than 60%.

A jurisdiction may spend up to 7.5% of its entitlement on administrative costs.

#### Notification

In conformance with HUD's Con Plan and A.I. requirements and the City's Citizen Participation Plan, a notice of the public hearing was first published in The Record on February 17, 2020, which began the 30-day public review period. Notices were published in English and Spanish, and a press release was issued on February 27, 2020. The draft Con Plan and A.I. were also posted on the City's website, shared via social media, and sent electronically to the City's various affordable housing stakeholders. The public notice period was extended to March 27, 2020, in response to two new HUD requirements: Broadband Access and Natural Hazards Resilience. Public comments received at the time of the preparation of this staff report are included as Attachment C.

#### FINANCIAL SUMMARY

The Con Plan includes estimated appropriations for the Economic Development Department - Housing Division's FY 2020-2025 budgets. These appropriations are dependent upon the receipt of anticipated funds from HUD and may vary based upon actual funding received (see Attachment A).

Attachment A - 2020-2025 Consolidated Plan  
Attachment B - Analysis of Impediments - Public Draft  
Attachment C - Public Comments to Con Plan and AI

## APPENDIX C

### AP-90 ESG Response

***Program Year 5 Action Plan ESG response:***

1. The following standards for providing Homelessness Prevention and Rapid Re-Housing assistance have been developed in cooperation with the San Joaquin Continuum of Care. To date, policies have not been developed for homeless assistance activities, but the City is committed to working with the Continuum of Care in the development of these policies in the future.

***A. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance***

All participant households must meet the following requirements:

- o Assessment and approval by an authorized program case manager;
- o Household income (adjusted by size) below 30% of area median income; and
- o Household must either be homeless (federal definition) or at imminent risk of losing housing and show a reasonable expectation of becoming self-sufficient within three months.

***B. Policies and procedures for coordination among providers.***

CVLIHC, who provides the homelessness prevention and rapid re-housing activities for both the City of Stockton and San Joaquin County, has established relationships with all the local shelters and service providers. CVLIHC will conduct outreach to notify them of the ESG program, changes in eligibility standards, and the process for making referrals to the program. CVLIHC is also well known in the community and receives many calls directly from those looking for housing assistance.

Additionally, regular meetings of the San Joaquin Continuum of Care, which are open to all providers, will continue to serve as a venue for ongoing program planning and coordination and feedback for program improvement.

***C. Policies and procedures for determining and prioritizing which eligible families will receive assistance***

Assistance will be provided to eligible households in the order in which they are interviewed. If a household is eligible and funds are available, they will receive assistance. All rapid re-housing clients must meet HUD's homeless definition (24 CFR 576.2) – person(s) staying on the streets, in a shelter, or someone exiting an institution after a stay of 90 days or less and who resided in a shelter or on the streets before the institution. All prevention clients must be able to demonstrate at least two HUD defined risk factors and that except for this program, the household will become homeless. While the ability to sustain housing is not a threshold requirement for program eligibility, as a program goal it is a consideration in determining the amount and length of assistance.

***D. Standards for determining share of rent and utilities that participant will pay, how long assistance may be received, how the amount of that assistance will be adjusted over time. Include limits, if any, on maximum amount of assistance, maximum number of months, or maximum number of time they may receive assistance.***

The following guidelines shall apply to all participating households:

- o Rent assistance will be limited to units that meet reasonable rent standards established by HUD;
- o Rent assistance cannot duplicate by time or amount assistance of assistance from any other federal, state, or local rent subsidy;
- o No rents will be paid directly to a participant household or individual member of a participant household;
- o Assistance is limited to one episode of homelessness or threat of homelessness;
- o The maximum amount of monthly rent assistance will be \$1,000; and
- o The maximum amount of assistance (all categories or types combined) to any one household is \$2,500.

The following guidelines shall apply to short-term rent assistance:

- o One-time assistance to qualified households covering no more than current month rent and up to two months in arrears.

The following guidelines shall apply to medium-term rent assistance:

- o To qualify for more than one time assistance, participants must be reassessed by an authorized case manager monthly;
- o The level of rent assistance after the initial assistance will normally be reduced by at least ten percent each month;
- o The maximum assistance available is three months' rent assistance plus no more than one month in arrears; and
- o Assistance beyond three months is on an individual, case-by-case basis.

Security deposits may be made for program participants to obtain new housing and utility deposits may be made for new units or when service is restored.

1. While there is no formal central intake system within the San Joaquin Continuum of Care, all homeless services providers, including those providing homeless prevention and rapid re-housing assistance, utilize the same HMIS. With a single subrecipient administering prevention and re-housing efforts, a single assessment tool is used for these activities. In addition, the City of Stockton is working with the San Joaquin Continuum of Care to develop and implement a formal coordinated assessment tool and process for use by all providers.
2. The City of Stockton uses the same process to select the CDBG and ESG subrecipients: A Notice of Funding Availability was issued in November, 2018 notifying interested organizations that the funding would be available. Upon receipt of applications, City staff met with staff from the San Joaquin Continuum of Care to discuss the applications and possible funding scenarios which would best meet the needs identified by the Continuum of Care. The Community Development Committee (CDC), a citizen's advisory group, met on February 7, 14 and 21, 2019 and reviewed the ESG applications and made recommendations which were

forwarded to the City Council with a recommendation to increase or decrease any final funding allocations on a pro rata basis. A public hearing before the City Council was held on June 18, 2019 at which time the Council approved the allocation of ESG funds.

4. All ESG subrecipient organizations have homeless or formerly homeless individuals as members of their Boards of Directors. Through coordination with the San Joaquin Continuum of Care, input on programs and policies from homeless and/or formerly homeless persons is provided regarding decisions on the use of ESG funds.
5. Performance standards for the ESG Rapid Re-housing and Homeless Prevention activities are based on standards used in evaluating HPRP performance and were developed in coordination with the San Joaquin Continuum of Care. These measures take into account the reduced level of funding that is available through the ESG program than was available through the HPRP. Specific performance measures focus on housing stability and recidivism, which are linked together; measurement is possible because all homeless service providers in the Continuum of Care participate in the HMIS.

Housing Stability: 70% of program participant households will maintain housing stability for 6 months following the end of rental assistance.

Measurement: Percentage of program participant households who maintain tenancy for 6 months following the end of rental assistance.

Recidivism: Less than 30% of program participant households will experience a subsequent episode of homelessness as evidenced by their return to emergency shelter.

Measurement: Total number of adult program participants with successful exits from the program (with a successful housing outcome) that had an emergency shelter stay of at least 1 night within 6 months of exiting the program.

The City and the San Joaquin Continuum of Care will continue to discuss and examine additional, feasible performance standards. Other standards will be considered as the programs evolve.


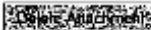



The City of Stockton and the San Joaquin Continuum of Care have worked together to develop the policies and procedures that have been developed for ESG activities and to discuss the basic allocation of ESG funds. Meetings focused on how to replicate the successes of the joint HPRP effort of San Joaquin County and the City of Stockton. Based on HPRP results, there was a general conclusion that the most effective use of ESG funds would be to continue the providing funding to the homeless shelters at essentially the same level as in prior years, with the remaining funding going to continue the homeless prevention and re-housing program as initially implemented in 2009. However, specific allocations of funds were made by the CDC and the City Council as described previously.

## Grantee SF-424's and Certification(s)

OMB Number: 4040-0034  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
*2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate item(s): <input type="text"/> * Other (Specify): <input type="text"/>		
*3. Date Received:		4. Applicant Identifier:
<input type="text"/>		<input type="text"/>
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
<input type="text"/>		<input type="text"/>
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
<input type="text"/>	<input type="text"/>	
8. APPLICANT INFORMATION:		
*a. Legal Name: <input type="text" value="City of Stockton"/>		
*b. Employer/Taxpayer Identification Number (EIN/TIN):		*c. UE:
<input type="text" value="94-6003436"/>		<input type="text" value="B730023 / 08229"/>
d. Address:		
* Street1:	<input type="text" value="525 North XL Corado Street"/>	
Street2:	<input type="text"/>	
* City:	<input type="text" value="Stockton"/>	
County/Parish:	<input type="text" value="San Joaquin"/>	
* State:	<input type="text" value="CA: California"/>	
Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="95202-1951"/>	
e. Organizational Unit:		
Department Name:		Division Name:
<input type="text" value="Economic Development Department"/>		<input type="text" value="Housing"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	<input type="text" value="Ms."/>	* First Name: <input type="text" value="Carrie"/>
Middle Name:	<input type="text"/>	
* Last Name:	<input type="text" value="Wright"/>	
Suffix:	<input type="text"/>	
Title: <input type="text" value="Director of Economic Development"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number:	Fax Number:	
<input type="text" value="(209) 937-5539"/>	<input type="text" value="(209) 937-5539"/>	
* Email: <input type="text" value="carrie.wright@stocktonca.gov"/>		



<b>Application for Federal Assistance SF-424</b>		
* 9. Type of Applicant 1: Select Applicant Type:		
C: City or Township Government		
Type of Applicant 2: Select Applicant Type:		
Type of Applicant 3: Select Applicant Type:		
* Other (specify):		
* 10. Name of Federal Agency:		
U. S. Department of Housing and Urban Development		
11. Catalog of Federal Domestic Assistance Number:		
14.239		
CFDA Title:		
HOME Investment Partnership Program		
* 12. Funding Opportunity Number:		
* Title:		
13. Competition Identification Number:		
Title:		
14. Areas Affected by Project (Cities, Counties, States, etc.):		
		
* 15. Descriptive Title of Applicant's Project:		
City of Shenandoah 2022-2023 Action Plan - HOME		
Attach supporting documents as specified in agency instructions.		
		

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	* b. Program/Project
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date	* b. End Date
18. Estimated Funding (\$):	
* a. Federal	1,826,435.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	977,738.00
* g. TOTAL	2,804,173.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internal site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix	* First Name
Middle Name	
* Last Name	
Suffix	
* Title	
* Telephone Number	
* Fax Number	
* Email	
* Signature of Authorized Representative	* Date Signed

### Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

Date

  
Title

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4240-0039  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

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**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4783) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
- Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-362) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§529 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290(d)-3 and 290(e)-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Stockton	

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### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-265), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-615), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§280 d-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7325) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Stockton	7/22/22

Standard Form 424B (Rev. 7-97) Back

## CERTIFICATION REGARDING LOBBYING

### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.


(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-L.L., "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-L.L., "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

* APPLICANT'S ORGANIZATION	
City of Stockton	
* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	
Prefix: _____	* First Name: Terry Middle Name: _____
* Last Name: Block	Suffix: _____
* Title: City Manager	
* SIGNATURE: 	* DATE: 7/22/22



## APPENDIX TO CERTIFICATIONS


### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424		
<p>* 1. Type of Submission:</p> <p><input type="checkbox"/> Preapplication</p> <p><input checked="" type="checkbox"/> Application</p> <p><input type="checkbox"/> Changed/Corrected Application</p>		
<p>* 2. Type of Application:</p> <p><input checked="" type="checkbox"/> New</p> <p><input type="checkbox"/> Continuation</p> <p><input type="checkbox"/> Revision</p>		
<p>* If Revision, select appropriate (check(s))</p> <p>* Other (Specify):</p>		
<p>* 3. Date Received</p>		<p>4. Applicant Identifier:</p>
<p>5a. Federal Entity Identifier</p>		<p>5b. Federal Award Identifier</p>
<p>State Use Only:</p>		
<p>6. Date Received by State:</p>		<p>7. State Application Identifier:</p>
<p>8. APPLICANT INFORMATION:</p>		
<p>* a. Legal Name: City of Stockton</p>		
<p>* b. Employer/Taxpayer Identification Number (EIN/TIN): 94-6003436</p>		<p>* c. UEI: KUBHX37QW129</p>
<p>d. Address:</p>		
* Street1:	425 North El Dorado Street	
* Street2:		
* City:	Stockton	
* County/Parish:	San Joaquin	
* State:	CA: California	
* Province:		
* Country:	USA: UNITED STATES	
* Zip / Postal Code:	95202-1551	
<p>e. Organizational Unit:</p>		
<p>Department Name: Economic Development Department</p>		<p>Division Name: Housing</p>
<p>f. Name and contact information of person to be contacted on matters involving this application:</p>		
Prefix:	Mr.	* First Name: Carole
Middle Name:		
* Last Name:	Wright	
Suffix:		
<p>Title: Director of Economic Development</p>		
<p>Organizational Affiliation:</p>		
<p>* Telephone Number: (209) 937-6539 Fax Number: (209) 937-3696</p>		
<p>* Email: carole.wright@stocktonca.gov</p>		

<b>Application for Federal Assistance SF-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/>		
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>		
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>		
<b>* Other (specify):</b> <input type="text"/>		
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U. S. Department of Housing and Urban Development"/>		
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.281"/>		
<b>CFDA Title:</b> <input type="text" value="Emergency Solutions Grants Program"/>		
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>		
<b>* Title:</b> <input type="text"/>		
<b>13. Competition Identification Number:</b> <input type="text"/>		
<b>Title:</b> <input type="text"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="checkbox"/> All America <input type="checkbox"/> State of Michigan <input type="checkbox"/> County of Wayne		
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="City of Sterling's 2022-2023 Action Plan - DRG"/>		
Attach supporting documents as specified in agency instructions. <input type="checkbox"/> All America <input type="checkbox"/> State of Michigan <input type="checkbox"/> County of Wayne		

<b>Application for Federal Assistance SF-424</b>	
<b>16. Congressional Districts Of:</b>	
* a. Applicant <input type="text" value="5"/>	* b. Program/Project <input type="text" value="4"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="07/01/2022"/>	* b. End Date: <input type="text" value="06/30/2023"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="284,870.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="284,870.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)</b> <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Carrile"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Wright"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Director of Economic Development"/>	
* Telephone Number: <input type="text" value="(209) 937-0539"/>	Fax Number: <input type="text" value="(209) 937-0599"/>
* Email: <input type="text" value="carrile.knight@tacofed.com.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="9-13-22"/>

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

H. BO  
Signature of Authorized Official

7/22/22  
Date

City Mgr.  
Title

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:


1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

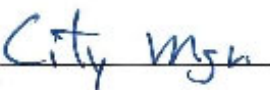
**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

  
Date

  
Title

## CERTIFICATION REGARDING LOBBYING

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* APPLICANT'S ORGANIZATION	
City of Houston	
* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	
Prefix: [ ]	* First Name: Terry Middle Name: [ ]
* Last Name: Slack	Suffix: [ ]
* Title: City Manager	
* SIGNATURE: [Signature]	* DATE: 7/22/22



# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2026

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to ensure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 86-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11735; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1955, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Stockton	7/24/22

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### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

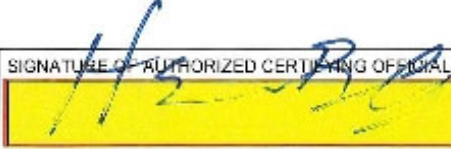
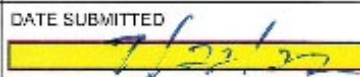
1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchase.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 105 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1965 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Stockton	DATE SUBMITTED 

Standard Form 424B (Rev. 7-97) Back

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4940-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0548-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§1726-1763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 89-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794) which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§5101-5107) which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.


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Prescribed by GMB Circular A-102



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11880; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1966 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1956, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§489a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Stockton	7/22/22

SF-424D (Rev. 7-97) Back

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**


#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424		
<div> <div> * 1. Type of Submission:  <input type="checkbox"/> Preapplication  <input checked="" type="checkbox"/> Application  <input type="checkbox"/> Changed/Corrected Application </div> <div> * 2. Type of Application:  <input checked="" type="checkbox"/> New  <input type="checkbox"/> Continuation  <input type="checkbox"/> Revision </div> <div> * If Revision, select appropriate letter(s):  <input type="text"/>  * Other (Specify):  <input type="text"/> </div> </div>		
* 3. Date Received:		4. Applicant Identifier:
<input type="text"/>		<input type="text"/>
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
<input type="text"/>		<input type="text"/>
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
<input type="text"/>	<input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Stockton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. UEI:
<input type="text" value="94-6006436"/>		<input type="text" value="KUBX3TC3125"/>
d. Address:		
* Street1:	<input type="text" value="425 North El Dorado Street"/>	
Street2:	<input type="text"/>	
* City:	<input type="text" value="Stockton"/>	
County/Parish:	<input type="text" value="San Joaquin"/>	
* State:	<input type="text" value="CA: California"/>	
Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="95202-1551"/>	
e. Organizational Unit:		
Department Name:		Division Name:
<input type="text" value="Economic Development Department"/>		<input type="text" value="ES05103"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	<input type="text" value="Mr."/>	* First Name:
Middle Name:	<input type="text"/>	<input type="text" value="Carrie"/>
* Last Name:	<input type="text" value="Wright"/>	
Suffix:	<input type="text"/>	
Title: <input type="text" value="Director of Economic Development"/>		
Organizational Affiliation:		
<input type="text"/>		
* Telephone Number:	<input type="text" value="(209) 537-6539"/>	Fax Number:
		<input type="text" value="(209) 537-5099"/>
* Email: <input type="text" value="carrie.wright@stocktonca.gov"/>		



<b>Application for Federal Assistance SF-424</b>	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U. S. Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.218"/>	
<b>CFDA Title:</b> <input type="text" value="Community Development Block Grant"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>	
<b>* Title:</b> <input type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="City of Stockton's 2022-2023 Action Plan - CDBG"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	5
* b. Program/Project	5
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	07/01/2022
* b. End Date:	06/30/2023
18. Estimated Funding (\$):	
* a. Federal	3,129,459.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	1,068,240.00
* f. Program Income	1,691,628.00
* g. TOTAL	5,889,328.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I ACREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions	
Authorized Representative:	
Prefix:	Ms.
* First Name:	Carrie
Middle Name:	
* Last Name:	Wright
Suffix:	
* Title:	Director of Economic Development
* Telephone Number:	(202) 937-8539
Fax Number:	(202) 937-9099
* Email:	carrie.wright@edacklombia.gov
* Signature of Authorized Representative:	
* Date Signed:	8-15-22

### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifics both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2022 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

  
Date

City Manager  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

H. B. A. 7/20/22  
Signature of Authorized Official Date

City Mgr.  
Title

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.


**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701b) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

  
Date

  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

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#### ASSURANCES - NON-CONSTRUCTION PROGRAMS

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**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4765) relating to prescribed standards for merit systems for programs funded under one of the 18 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1686-1686); which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.


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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11980; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§459a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1986 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Stockton	DATE SUBMITTED 7/22/22

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### CERTIFICATION REGARDING LOBBYING

#### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

* APPLICANT'S ORGANIZATION	
City of Stockton	
* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	
Prefix:	* First Name: <u>Harry</u> Middle Name: <u></u>
* Last Name: <u>Finck</u>	Suffix: <u></u>
* Title: <u>City Manager</u>	
* SIGNATURE: <u>Harry B. Finck</u>	* DATE: <u>7/22/22</u>

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the crafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1601-1663, and 1605-1606), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 ds-3 and 290 ee 3), as amended relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190); and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Director of Economic Development
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Stockton	8/16/22

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