

APPENDIX A: PUBLIC OUTREACH



February 2025

City of Tracy
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COMMUNITY AND ECONOMIC
DEVELOPMENT DEPARTMENT

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February 5, 2025

John Beckman
Chief Executive Officer
BIA of the Greater Valley

Mr. Beckman,

The purpose of this letter is to acknowledge receipt of the letter, dated November 2, 2023, which you submitted to the State of California Department of Housing and Community Development (HCD) in response to the City of Tracy's draft Housing Element, and the email which you provided on December 19, 2024. I also want to thank you for your time in meeting with me on January 3, 2024 to discuss this and other concerns. I am encouraged by our recent conversations and am confident that our partnership with you and the residential development community will continue to grow.

As you are aware, the City of Tracy has a strong tradition of being a pro-housing community and has been a regional leader in growth over the past twenty years. From 2000 to 2020, the City of Tracy increased its housing supply by 35%. Over the past year, the City approved over 1,500 additional residential lots and the City has not denied a residential project in the last 30 years. The City has no intention to divert from this practice.

I understand that many of the frustrations experienced by the homebuilders that you represent stem from delays that occurred between the approval of the project (entitlement) and the issuance of building permits authorizing construction of the units. While I cannot speak to past projects, I can ensure you that the City is not intentionally or knowingly delaying any project. Rather, we are continuously looking for ways to better serve the public and deliver these projects. I assure you that the City is now meeting all its statutory obligations under State law regarding timeframes.

In regard to the referenced Grand Jury report, we are confident that today's City Council is keenly aware of the past perceptions and current expectations for operating in a professional and productive manner. We do not believe that any of the conditions described in the report to be ongoing or reflective of current staff. If you still believe there to be such issues, please reach out to me directly.

In summary, I appreciate you bringing to my attention your concerns with the development review process. Let me ensure you that we will continue to identify and implement opportunities to create a more responsive and productive system and we encourage you to remain engaged in our healthy dialogue.

Sincerely,

Forrest B. Ebbs
Director of Community Development
City of Tracy

Letter from BIA

Significant Legal Deficiencies Remain in the City of Tracy's July 2024 Revised Draft Housing Element

1. Inadequate revisions regarding reliance on pipeline projects to meet entire above-moderate RHNA.

HCD's Feb. 20, 2024 Review Letter required the Revised Element to provide important additional information about the status of pipeline projects, constraints to their final approval and construction, and to identify specific program and policy commitments to expedite construction and occupancy:

The element identified 3.149 units...that are either pending approvals, approved, or under construction. While the element included the project status for each project, it should also demonstrate the likelihood that these units will be available during the planning period. To demonstrate availability, the element could analyze infrastructure schedules, City's past completion rates on pipeline projects, outreach with project developers, describe expiration dates on entitlements, anticipated timelines for final approvals, phasing requirements, and any remaining steps for projects to receive final entitlements....

[G]iven the element's reliance on pipeline projects, the element should add or modify programs to facilitate development (e.g. coordinate with applicants to approve remaining entitlements, expediting approvals) and monitor progress toward completion in the planning period....

Finally, the element should address public comments on this revised draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.... Programs must have specific commitment...and discrete timing.

The Revised Element fails to satisfy these requirements in the following respects:

- With respect to HCD's finding requiring additional information on pipeline projects, the Revised Element adds only vague, limited, and incomplete information to Table IV-12.

- To satisfy HCD's finding, Table IV-12 should be revised to include a thorough and uniform step-by-step matrix of the city's review and approval process that includes the following:
 - Identify every permit, approval, review, and inspection process/requirement that remains for each project through issuance of COO.
 - Define and describe with specificity each permit, approval, review and inspection process/requirement in clear and consistent manner.
 - Identify the department/ departments and individuals responsible for reviewing each remaining application/approval/inspection and for making the decisions on them.
 - Identify the specific stage that each project is in as of the date of the next Revised Element
 - Specify the specific date (month and year) by which each remaining permit, approval, review, and inspection up to COO is expected to be completed and whether each permit, approval, review and inspection is subject to the information, application review, decision timelines and other provisions of the Permit Streamlining Act and/or AB 2234.
- With respect to HCDs' finding that requires the Revised Element to identify and remove policies and practices that constrain completion of pipeline projects, the Revised Draft asserts that: *"The City has reviewed the pending projects and there are no known barriers to development, phasing, or other relevant factors that would prohibit the pending projects from being completed."*
- This conclusory statement is contradicted by detailed comments submitted by the development community, as well as the findings of the Civil Grand Jury. The city's consistent response to extensive and detailed comments submitted by BIAGV and other developers who have brought these issues directly to the attention of the city at public hearings in connection with projects has been to blame the developer. According to the Revised Draft's response to comments, the City of Tracy has no policies or practices with respect to development processing that constrain housing, and that every problem identified by the development community (and the Grand Jury) is the fault of developers. The Revised Draft fails to acknowledge that state law imposes important limits on local practices regarding deeming applications incomplete, demanding additional information from applicants, and timelines to review applications both for completeness and making final decisions. Both the development community and the Grand Jury have identified these as significant problems and the Revised Element neither acknowledges them nor commits to address them.
- To satisfy HCD's finding, the Revised Draft should be required to include the following additional Program and Policy.

Program: Facilitate and Expedite Completion of Pipeline Projects

Policy. The city shall immediately meet with the developers of Pipeline Projects to develop a Completion Schedule that identifies each remaining permit, approval, review and inspection that will be required up to COO. The Completion Schedule shall identify whether the permit, approval, review, or inspection is discretionary or ministerial and the state law (e.g. Permit Streamlining Act, AB 2234) governing the process and timelines for each. The Completion Schedule shall also identify the department(s) and staff that will be responsible for compliance with these process and timeline provisions.

2. Inadequate revisions addressing governmental constraints.

HCD's Feb. 20, 2024 Review Letter required the Revised Element to comply with housing element law provisions addressing governmental constraints: "*As noted in Findings B4, the element requires a complete analysis of potential governmental...constraints. Depending on the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.*"

The Revised Element fails to satisfy these requirements in the following respects:

- With one minor exception, the Revised Element's governmental constraints analysis does not identify any specific policies regarding the timing and processing of development permits that are constraints. This is consistent with the Revised Draft's assertion that developers are responsible for every instance of delay and difficulty. Since the Revised Draft does not acknowledge that it has any policies or practices that constrain development, the Revised Draft contains no revised or additional programs that address and remove or mitigate any identified constraints (other than the minimal GMO exception for affordable housing units). Instead, the constraints policy simply calls for the city to "review and adjust as appropriate" any policy that the city determines at some future date is a constraint. Notably, even this bare policy represents a weakening of housing element requirements. Housing element law requires the city to "address, and where legally possible remove governmental constraints." The Revised Element's Policy R.1 commits only to "review and adjust" constraints:

D. Remove Governmental Constraints

Pursuant to State law, the City is obligated to address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. Removing constraints on housing development can help address housing needs in the City by expediting construction, and lowering development costs.

V. Housing Plan

Goal 4.0

Mitigate any potential governmental constraints to housing production and affordability.

Policy 4.1

Review and adjust as appropriate residential development standards, regulations, ordinances, and processing procedures that are determined to constrain housing development, particularly housing for lower and moderate income households and for persons with special needs.

Allow more than 150 affordable housing units as exceptions under the GMO.

- To satisfy HCD's finding, the Revised Draft should be required to include the following additional Program and Policies:

Program: Ongoing Housing Constraints Review and Mitigation/Removal.

Policy. The city shall complete a systematic review each year during the planning period, with the active participation of the development community, of residential development standards, regulations, ordinances, and processing procedures and practices to identify potential constraints to the maintenance, improvement, and development of housing for all income levels. Following the review, in a timely manner revise, and where legally possible remove, any standard, ordinance, procedure or practice that could be reasonably determined to constraining the review, approval, and construction of housing.

Policy. Prior to proposing any new or more stringent standard, regulation, procedure or practice that potentially constrains new housing (including, but not limited to, adoption of the inclusionary housing policy identified in Program 13), the city shall subject the proposal to a constraints analysis and if the proposal would potentially act as a constraint, either not pursue the proposal, or modify it to minimize the constraint to the maximum extent feasible while achieving the underlying policy goal. For example, future inclusionary zoning ordinance.

Program: Local Permits and Processing Times

Policy. The city shall address the findings of the 2023-2024 Civil Grand Jury Report that pertain to residential development, e.g. Findings F 2.1 through 2.5, and implement Recommendations R2.1 through R2.5.

Policy: The city shall ensure that all departments and staff are aware of the requirements of state law regarding entitlement and post-entitlement review, including the Permit Streamlining Act and Government Code Section 65913.3, and the city shall comply with the statutory requirements.

3. Inadequate program relating to preempted Density Bonus Ordinance.

While the Revised Draft identifies the need to revise the city's Density Bonus Ordinance as part of Program 14, the discussion and commitment to action are inadequate. The city's current

ordinance conflicts with state law in numerous significant ways. These conflicts should be expressly acknowledged in the Revised Draft and Program 14 should be revised to include a Policy commitment to ensure that all development applicants are apprised of the specific provisions of the city's ordinance that are unenforceable. These include the requirement that applicants submit a project pro forma as part of a density bonus application; the requirement that applicants pay a fee to the city to peer review the pro forma; improperly placing the burden of proving that concessions/incentives/waivers should be granted on the applicant; imposing improper conditions on the issuance of concessions/incentives/waivers (such as a requirement that they be necessary to make projects economically feasible); improperly segmenting concessions (such as treating each story of height-reduction as requiring a separate concession); and improperly limiting the scope and breadth of concessions.

Maintaining the existing ordinance online without prominent notice to applicants that it is in critical aspects invalid and unenforceable creates a substantial risk that applicants will believe they have to comply with unlawful requirements.

Program 14 should also be revised to include a commitment to update the local ordinance by a date certain; a commitment to follow state law as interpreted by recent case law and HCD TAs; and a commitment to include on the city's development web page a prominent notice that the current ordinance is unenforceable in key respects along with an identification of the specific conflicts with state law and a link to Government Code Section 65915.

4. Inadequate revisions to the Large Sites Program.

HCD's Feb. 20, 2024 Review Letter required the Revised Element to revise Program 10 (Development of Large Sites) to include additional program and policy commitments to justify relying on these sites for meeting a significant part of the city's affordable housing adequate sites obligation.

The Revised Draft does not identify any specific incentives or strategies to ensure that the market rate units necessary to enable development of the sub-areas with affordable units will be approved and be economically feasible and therefore fails to satisfy HCD's requirements. Program 10 should be amended to include the following specific commitments:

- By a date certain, the city shall send standardized notices to each owner of a Large Site that includes a copy of the Revised Draft's narrative/expected development for the entire site and the sub-area that is projected to be developed with affordable units.
- The city shall request that the owner submit recommendations, modifications, proposed incentives and an overall plan for developing and approving a master plan or specific plan for the economically feasible development of site.
- The city shall meet with the owner to discuss the owner's recommendations and make a good faith effort to agree on plan for developing and approving a master plan or specific plan that ensures approval of the plan and completion of construction during the planning period.

Conclusion

The City of Tracy's Revised Draft Housing Element does not adequately address the significant deficiencies identified by HCD in its review letter or by members of the development community and the Civil Grand Jury and therefore does not substantially comply with Housing Element law. Unless and until the City of Tracy adopts a significantly revised draft that does address these deficiencies, HCD should continue to find the City out of housing element compliance and subject to the Builder's Remedy and other consequences of being out of compliance. This will be especially important in the near future as legislation effecting important strengthening of Builder's Remedy Law and the elimination of "self-certification" are on the verge of being enacted and signed into law to become effective Jan. 1, 2025.

City of Tracy's Response

The City of Tracy is responsible for providing a wide range of housing options and opportunities to our community and citizens. The State of California requires the City to identify housing that will be provided in various densities and income levels. This includes providing sites to meet all of our RHNA obligations.

The State has an interest in making sure our sites inventory includes sites to be spaced throughout the community and that these sites include a range of densities and income ranges. The City is obligated to ensure that a wide range of housing opportunities occurs in all the various locations in Tracy. The City has accomplished that with our siting of the properties necessary to meet our housing obligation.

The City is required to identify policies or programs that provide constraints to the construction of housing. Staff has reviewed the current pipeline as well as internal policies and programs for our review and approval of development projects. The City is obligated to comply with Federal, State and local laws and requirements for how we review, process and approve applications and projects. Our review looks to streamline and eliminate any process constraints where staff can. The City does work with the development community to move projects forward, but in certain instances, outside forces (interest rates, the housing market, material supply, labor constraints) create market conditions that the City has absolutely no control over. The BIA letter requests staff to identify completion schedules for projects that exceed our scope and jurisdictional boundary.

In many cases outside forces will affect timing and delivery of projects. The completion of improvement plans, physical construction and ultimate project sales and delivery requires a partnership that in many instances the City does not control, nor are we informed or contacted about.

The 2023-2031 Housing Element includes numerous development code updates, new provisions and new programs to meet current and future state requirements and laws. The Housing Element is a living and breathing document that requires constant review and implementation of. The BIA letter identifies numerous programs that are required by the state. These are identified as program priorities. This are required to be completed and implemented.

The BIA letter identifies some project delays because of timing of improvement plans and final maps. The development community is obligated to comply with environmental measures, conditions of approval and any obligations for community facility districts or development agreements. In most, if not all instances, the review of improvement plans and final maps is not delayed by staff, but by the timing of submittals and the ability of developers to satisfy various federal, state and local conditions. Market conditions and financing determines the speed and timing of projects. Staff continues to review its role in the process and ensure that projects move forward in a timely manner, while staff verifies that requirements are met. Typically, the development community drive the post approval process and the delivery timing.

The City considers the BIA a partner in the development process and meaningful dialog to ensure a timely process takes place has occurred. The City has a long history of growth and project approval and ultimate development. The City will work to ensure this collaborative relationship continues.

Appendix A Public Outreach

The City of Tracy solicited community input throughout the Housing Element update planning process in a variety of ways. The main strategies to gather public participation are summarized below. Between March and June 2023, the City conducted its primary Community Outreach and Engagement initiative, incorporating a series of events such as study sessions, virtual community workshops, stakeholder interviews, and a Balancing Act exercise. During this time residents were also encouraged to participate in a survey to provide their input about housing needs. These activities are detailed below.

Outreach Activities

Community members were engaged using the following methods:

- Survey available in hard copy and online in both English and Spanish
- Stakeholder focus group interviews
- Dedicated Webpage on City website
- Email list
- Community workshops
- Joint City Council and Planning Commission study session
- Public hearings

Organizations Contacted and Consulted

Organizations contacted and interviewed included:

- McHenry House Tracy Family Shelter
- Souza Realty and Development
- City of Tracy Homeless Services
- City of Tracy Code Enforcement
- Housing Authority of the County of San Joaquin
- The Surland Companies
- Lennar Homes of California
- Meritage Homes
- Bright Development
- Coalition of Tracy Citizens to Assist Homeless
- San Joaquin County Homeless Initiatives
- Tracy Community Connections Center
- San Joaquin Fair Housing
- BIA of the Greater Valley
- Neighborhood Preservation Division, San Joaquin County
- Tracy Family Resource Center
- Tracy Seniors Association
- Central Valley Low Income Housing Corporation
- HBR Rentals
- Crown Key Realty
- At Home Real Estate
- HERO Real Estate

The City made a comprehensive effort to reach lower- and moderate-income individuals to participate in the Housing Element Update. As noted above, the City developed a multi-lingual

outreach campaign, contacted a variety of local organizations including advocacy groups and the fair housing service provider, local service providers, and community centered organizations.

Housing Element Update Website

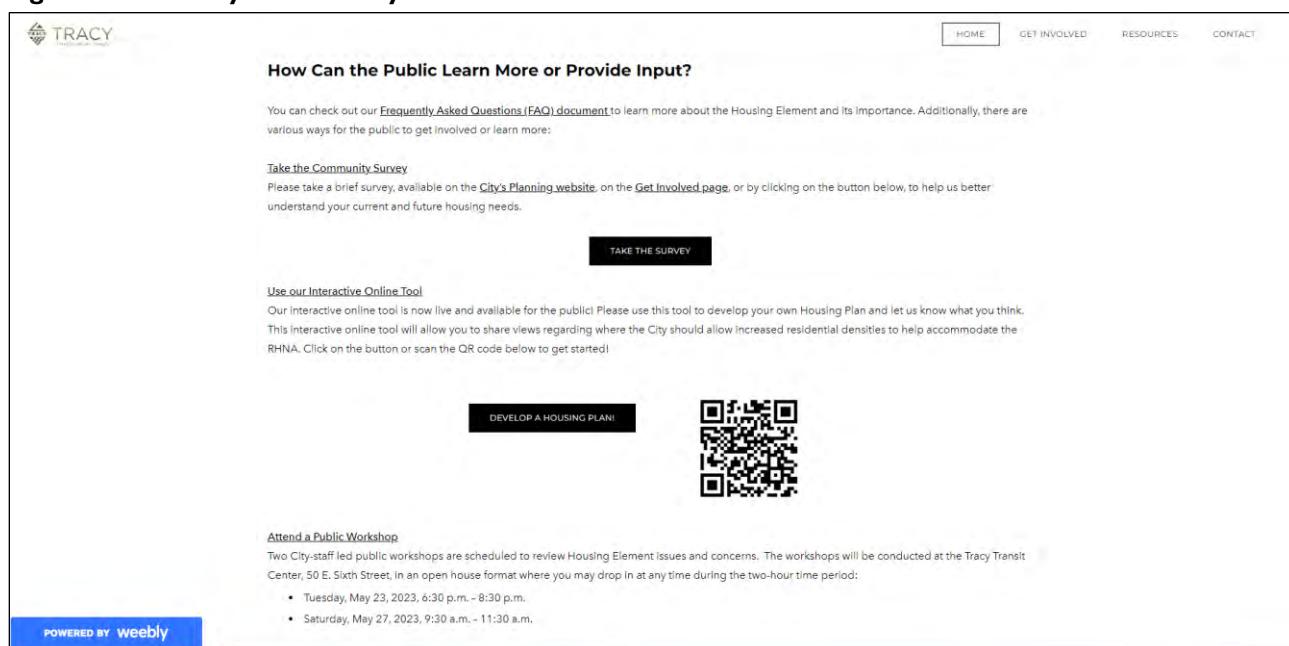
The City created the Housing Element update webpage on the City's website to provide:

- Background and information on the Housing Element process;
- Link to the Housing Element update survey;
- Documents related to the Housing Element, including the first public review draft;
- Presentation materials and recordings of presentations
- Notification to the public of future events

Figure A-1: Housing Element Update Website



Figure A-2: Survey Link on City Website



Stakeholder Interviews

The City contacted over 30 individuals and groups including service providers nonprofits, and other identified stakeholders to participate in focus group interview about the housing needs and issues in Tracy. Out of the 30 individuals and groups that were contacted, 17 individuals participated in the three focus group held: April 10, 2023 at 12:00 PM; April 17, 2023 at 12:00 PM, and one on April 19, 2023 at 12:00 PM where the group was divided into 2 breakout rooms for discussion. Multiple dates and times were offered for increased flexibility to accommodate various schedules; however, all of the participants requested a 12:00 PM time. The stakeholders who participated discussed a variety of concerns including:

- Residential Growth Allotment (RGA) as a possible constraint to growth and the development review process;
- A lack of affordable housing options and how to incentivize senior and affordable development in the City;
- High development and impact fees;
- Tracy does not have the capacity to support people experiencing homelessness, most of the social services and housing resources are located in Stockton; and
- Need for more education and outreach to inform residents of housing law and what affordable housing is, to shift the perceived stigma.

Detailed responses are provided in the Supplementary Documents section at the end of this chapter.

Balancing Act

The City utilized the Balancing Act online interactive tool to gather input and help inform staff, the Planning Commission, and City Council on decisions regarding the Housing Element. The Balancing Act allows the public to allocate density/housing units to areas of the City that correspond to the opportunity sites identified in the sites inventory, with the goal to allocate housing units and density until the RHNA is reached. The results provide the City with the preferences of the public as well as an educational tool for the public that describes the challenges and choices related to the Housing Element opportunity sites strategy. The tool received 400 total pageviews and 14 completed housing element simulations (https://tracy_housing.abalancingact.com/tracy-heu). The following areas were the top three areas identified by the participants where housing should be allocated and increased.

1. Valpico Rd sites (Areas 8A, 8B, and 8C)
2. The Bowtie sites (Areas 7A, 7B, 7C, and 7D)
3. I-205 Corridor sites (Areas 1A and 1B)

Figure A-3: Balancing Act Page—English

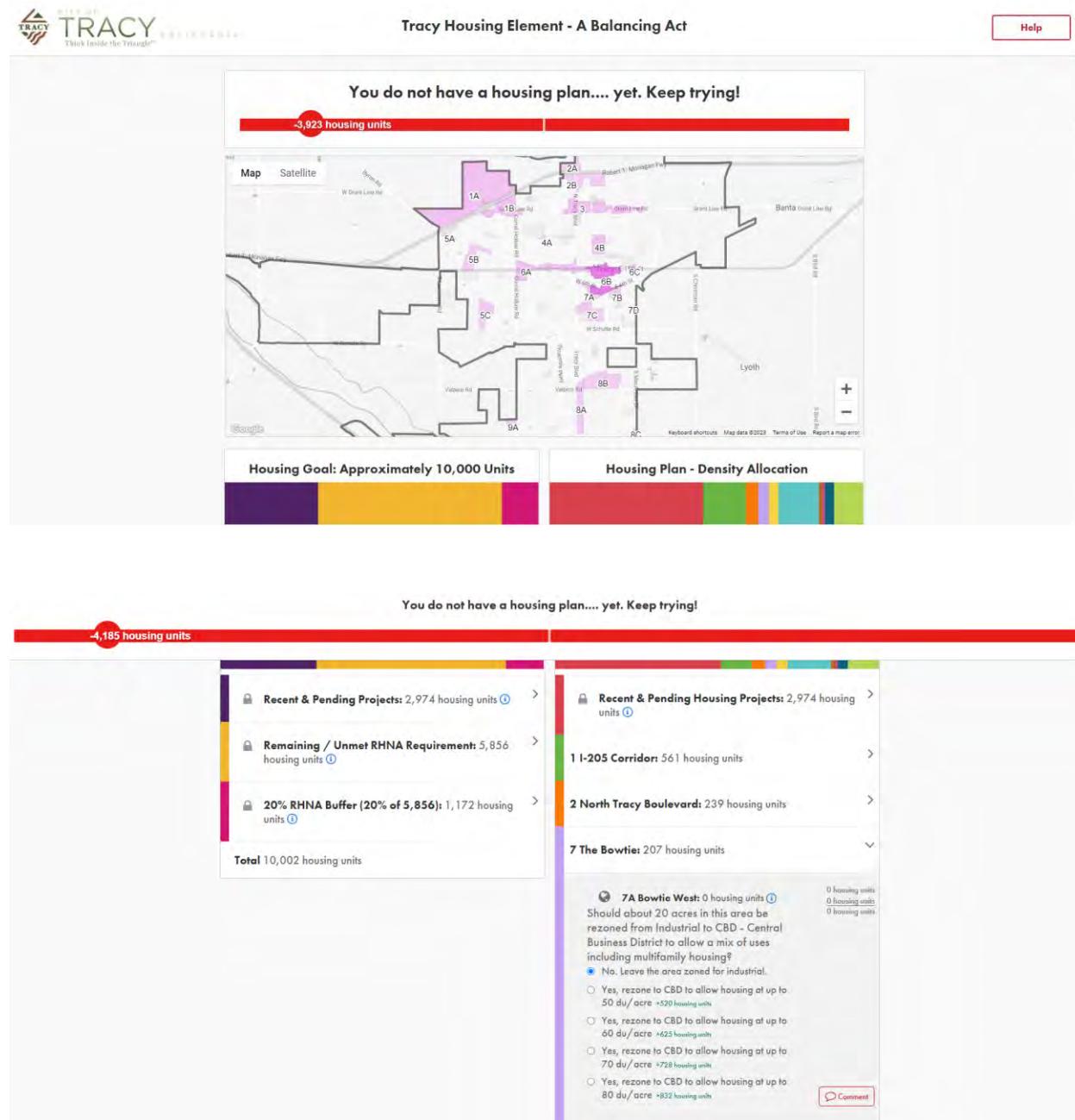
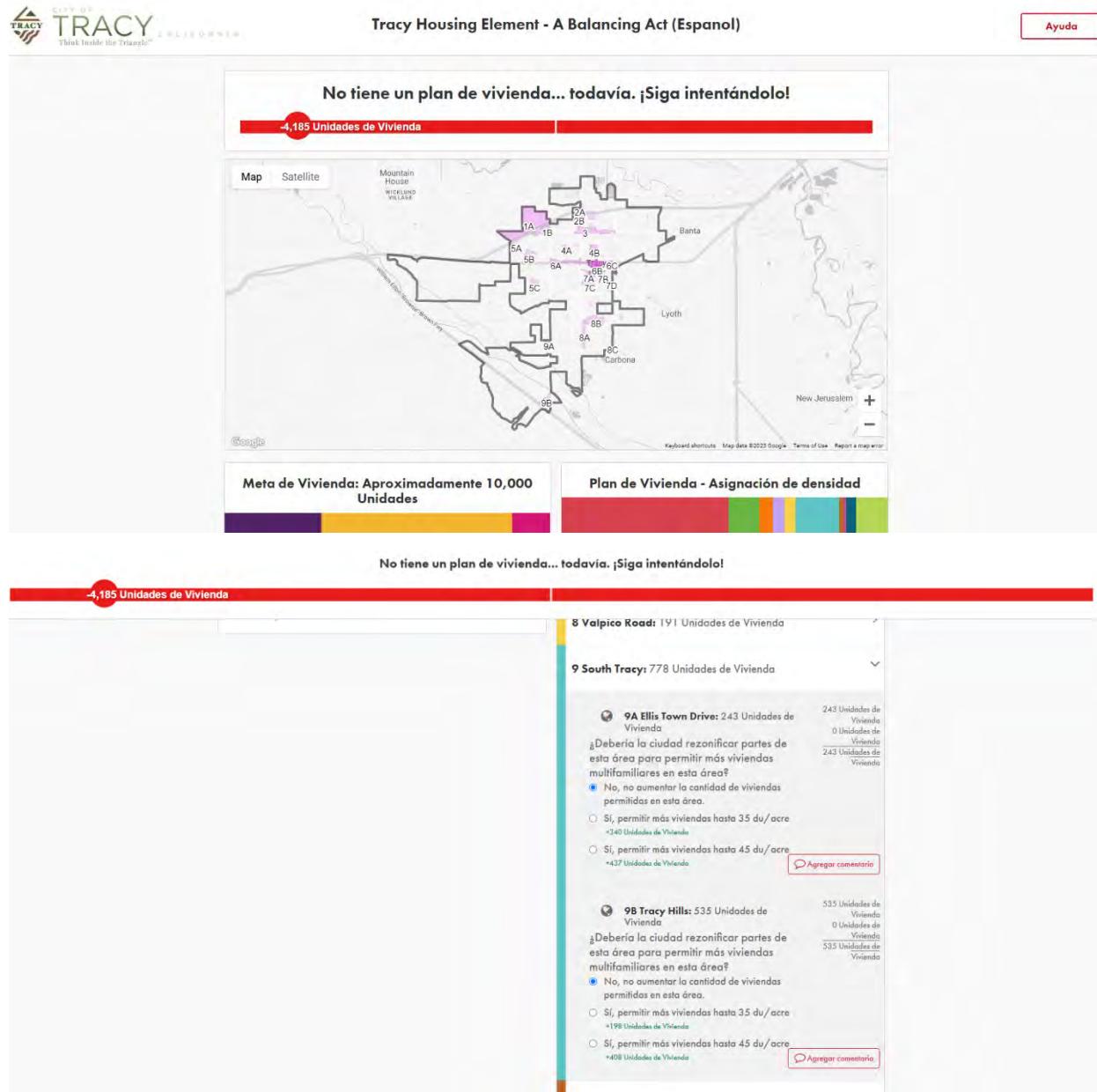


Figure A-4: Balancing Act Page—Spanish



Public Workshops

Two City-staff led public workshops were held to review Housing Element issues and concerns. The workshops were conducted at the Tracy Transit Center in an open house format where the public could drop in at any time during the two-hour time period. The Balancing Act was available as an interactive element during the workshops. The workshops were held on the following dates:

- Tuesday, May 23, 2023, 6:30 p.m. – 8:30 p.m.
- Saturday, May 27, 2023, 9:30 a.m. – 11:30 a.m.
- Saturday, June 3, 2023, 11:00 a.m. – 1:00 p.m.

Study Session

The City held a special joint City Council and Planning Commission study session on March 22, 2023. The session included a detailed presentation of the requirements of the 6th cycle Housing Element Update, the RHNA requirements and the preliminary opportunity site selection strategy and results. This included identification of the need to increase densities through zoning amendments and rezones to meet the RHNA. The presentation was followed by a robust question and answer session, including comments and questions from members of the public, Planning Commission and City Council, and city staff. The session served to establish a foundation of understanding of the requirements and challenges facing the City of Tracy. It was recorded and posted on the City housing element update webpage for future reference and to increase knowledge and understanding throughout the update period.

Public Hearings

Comments and requests were received during the joint meeting held before the City Council and Planning Commission on October 24 2023. The letters received are located at the end of this Appendix. The responses in the Housing Element are explained in Chapter 1, Introduction.

Housing Element Survey

Respondents were presented with specific questions based on tenure, alongside general inquiries about housing needs that were applicable to all participants.

The survey received 138 respondents.¹ Respondent characteristics are as follows:

- 59 percent were homeowners and 17 percent were owners;
- 58 percent have lived in Tracy over 10 years;
- 19 percent were seniors (over 65 years old); and
- 16 percent were experiencing housing insecurity in Tracy (i.e. trouble paying rent, poor housing quality)

When asked about their improvement plans within the next five years, interior remodels, exterior remodels, and solar panels were the top three improvement types reported. Homeowners also expressed interest in considering Accessory Dwelling Units (ADUs) for accommodating their parents, relatives, and children, as well as for generating additional income. However, homeowners identified the main obstacles for ADU construction as costs and challenges related to technical design, permitting, and construction processes.

According to renter respondents, their housing options were primarily limited by monthly costs. Despite this limitation, a significant majority (87 percent) of renters reported that their rental units were either well maintained or very well maintained.

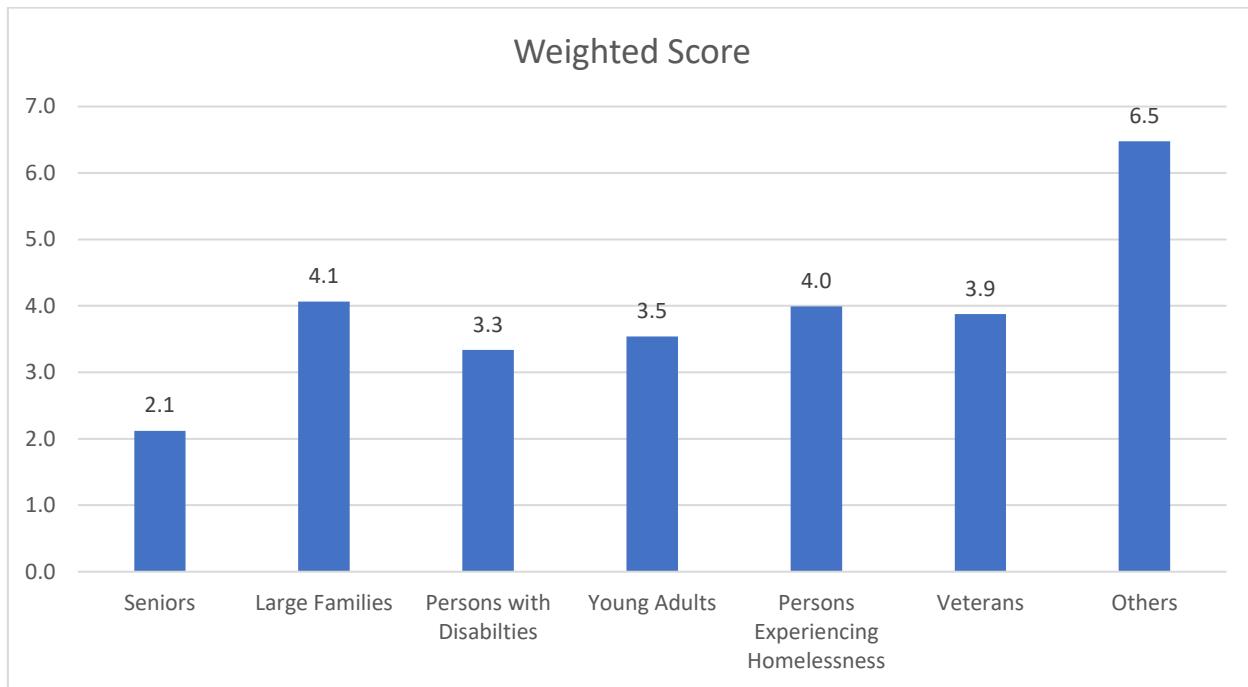
All respondents were asked to whether they "Strongly Agree," "Somewhat Agree," "Neither Agree nor Disagree," "Somewhat Disagree," or "Strongly Disagree" with statements.

- Over 50 percent of respondents strongly agreed that it is difficult to find affordable rental housing in Tracy;

¹ The Spanish survey only received one response. Responses from the Spanish response were incorporated into the English responses.

- 60 percent strongly agreed that it is difficult to find affordable homes for purchase in the City;
- 45 percent strongly or somewhat agreed that conditions of neighborhoods (streetlights, sidewalks, parks, etc.) were the foremost challenge in the community; and
- 39 percent strongly or somewhat agreed that the condition of existing housing and property maintenance is the foremost challenge facing the community.

Respondents were also asked to rank the groups by order of need of housing. According to their rankings, seniors, persons with disabilities, and veterans were deemed to have the highest need (lowest score). Moreover, the respondents provided written feedback expressing that single-person households, single-parent households, single-income households, and low-income households also face significant housing needs.



Supplementary Documents

Michael Baker

I N T E R N A T I O N A L

We Make a Difference

MEMORANDUM

Date: Tuesday, May 9, 2023

Subject: Tracy Housing Element Update Focus Group Summary

Focus Group #1 – April 10, 2023 12:00 PM

Facilitator: Cameron Savao (Michael Baker Int'l.)

Individual	Organization/Affiliation
Virginia Carney	Homeless Services Manager for the City of Tracy
David Eveler	Community Development Manager at Community Partnership for Families of San Joaquin (which serves Tracy)

Virginia - Sits on Continuum of Care (C.O.C.) The city has opportunities to be in conversations with bigger stakeholders like Cal Cities and is encouraging this kind of collaboration. Housing Connector (based out of Seattle Washington) has recently come up as a new partner and has begun discussions with the City on how they can help. It's best to start conversations with affordable housing providers in the region – which is just now beginning. Shared housing, transitional housing (Tracy has a couple – with not ideal conditions like 4 people to a room (Cal Lane).

David – Sees many families struggling with rent in Tracy. Tracy is the gateway to the Bay Area so people purchase there to access higher paying jobs in the Bay Area. Competition for the units have driven up rent and mortgages. This problem is exacerbated by COVID and the current economy. People frequent his organization to pay rent or back rent and meet other financial needs related to housing. His organization deals more with low-income families rather than homeless. Also sees people double and triple up in housing. Also seeing lots of refugees – Brazil last year, Colombia this year mostly but also Afghans, Iraqis, Pakistanis, etc. Three of the four families this year has found housing. Seniors are also part of the population he serves.

What is the number one housing priority the City should try to address in the next 3 years?

- There are currently 48 people in the shelter. People sharing housing vouchers to get housing – it's too expensive. Connect housing services with other social services – job help, mental services.
- Housing support services to address financial assistance, overcrowding, seniors, refugee status and assistance.

Are there any geographic areas of the City with racial, ethnic, or income segregation? Describe the advantages/disadvantages that one area may have compared to another.

- Central core from Clover (along I-205) all the way to Schulte Street, Tracy Blvd. west to MacArthur – predominant Hispanic (immigrant too) and more impoverished areas.

What are some of the housing issues that the community is experiencing?

- Gospel hospital mission. Has beds that people can use as an opportunity.
- Cost of living – rents are sky rocketing. Apartments by Costco around \$2,800 a month. Bay Area cost of living has affected the cost of living in Tracy. From 2009 – to present the City has grown by 6 times the cost (based off what Virginia's family has experienced).
- Same housing issues as the Bay Area counties, permeated into Tracy – people leave the Bay expecting to get relief from the high prices but this has only brought the same problems to Tracy.
- People experiencing homelessness in Tracy want to stay there since lots of them grew up there in the first place. However, there is a lack of services in / close to the city.
- Lots of high-end apartments have been built recently. Biggest industry in Tracy happens to be mostly in labor like warehousing / construction. High-end housing being built is displacing the residents. Higher paying local jobs would help (on one end of the issue).
- There is a large population of baby boomers that cannot afford to live here anymore either. Lots of homeless seniors with high medical bills being pushed out by housing / skilled nursing facilities because the costs are too high. Even the nurses can't afford the rent to an extent.

What factors may be contributing to or compounding these housing issues in the City?

- History of the county/city has made the problem worse. Both have denied affordable housing resources and funding for homeless services with the intention that it would attract people with those needs. But it has only exacerbated the issue. Cities aren't collaboratively working together still – or at least as efficiently as they can be.
- Tracy has begun to address this issue – the fact that Virginia has been appointed to her current position is even evidence that the region is starting to take the issue more seriously.

Are you aware of any program or policies that have been implemented to address some of these issues?

How are they working/how did they work? Would you suggest any changes to them?

- Tracy Homeless Advisory Committee - established by City Council Resolution 2021-033 on March 16, 2021. This is a serious step towards addressing the issue which Virginia is looking forward to. Lots of State and Federal Grants to look into.

How should the City address these issue(s) for the 2023-2031 housing element planning period?

- Needs state funds, land owned or donated to the city for development of supportive housing, and there already is an agreed supportive housing provider to help operate.
- Needs list of developers – Eden Housing potential.

What do see as the biggest impediments to housing production? (Land, zoning, NIMBY, historic, regulatory process, environmental, infrastructure, etc.)

- Most of social services and housing resources that Tracy needs are located in Stockton which are particularly difficult to get to. Tracy has a new bus line that connects the shelter to other services and there's also a shuttle now too. However, most who struggle with homelessness have a hard time still accessing these services – considering a significant portion of people struggle with behavioral issues.

- County is now making monthly visits to the shelter to help this population. Tracy is just starting conversation on issues of homelessness and social services. Better late than never, but Tracy is behind the curve due to the history of how local government has dealt with and funded the issue.

What else can be done to produce housing for low- to moderate-income households?

- Federal funding to support refugees who have come to Tracy.
- Needs state funds, land owned or donated to the city for development of supportive housing, and there already is an agreed supportive housing provider to help operate.

Can you identify or recommend any specific sites or geographic areas to build or locate high-density and/or affordable housing? (Vacant, underutilized, commercial, industrial, institutional, etc.)

- Most of the central core is built out. South southwest is hard to build too. North of I-205 has lots of opportunities for building (this is within unincorporated county land). East of town is mostly zoned for warehouse or light industrial uses and some Agriculture. Making this more accessible to development with transit would help.

Takeaways:

- Lack of services and funding (housing and social) to support the homeless population.
- Need for workforce, supportive/transitional, and senior housing.
- Tracy has received an influx of population from the Bay Area which has put a burden on housing stock and cost.

Focus Group #2 – April 17, 2023 12:00 PM

Facilitator: Cameron Savoie (Michael Baker Intl.)

Individual	Organization/Affiliation
John Beckman (JB)	COO of BIA; trade association representing home builders and land developers
Kathy Bergthold (KB)	President of Tracy Seniors Association, 11 years, St Bernard's Ministry of Caring, board for museum
Robert Brooke-Munoz (RBM)	Director of San Joaquin Fair Housing; serving San Joaquin County for 40; to ensure tenants and landlords know rights and responsibilities
Connie Diestler (CD)	CEO of Coalition of Tracy Citizens, run two men's homes in City; one more rehab, elderly disabled, VLI men,
Mike Souza (MS)	Owner of Souza Realty and Development; Real Estate development in Tracy; PM of Tracy hills project

What is the number one housing priority the City should try to address in the next 8 years?

- KB: contact with seniors, many seniors cannot afford housing; low-income housing has long waitlist; (housing for individuals on a fixed income);

- RBM: "handful of calls from Tracy"; biggest complaint seniors who cannot afford housing on a fixed income; people who grew up there having to leave because of influx from people from the Bay Area; waiting lists are long
- JB: w/o government subsidies there is no affordable housing
 - Trying to promote the inclusion of smaller units, ADUs, townhouses, missing middle in existing subdivisions and credits for that on Regional Growth Allocation
 - Restriction of the "Residential Growth Allocation"
- MS: RGA is 750 then down to 600 RGA and same # of building permits
 - Exempting just the very low and low is not enough
 - Not a lot of areas that are within the right demographic region to qualify for tax credits in Tracy;

Are there any geographic areas of the City with racial, ethnic, or income segregation? Describe the advantages/disadvantages that one area may have compared to another.

- CD: All demographics come in through programs; greater need for the disabled; need for one story units
 - Would back and support something like that to remove the RGA; would need to be advertised really well and targeted and understood
- RBM: has served 183 female headed households in
 - Need for support for female-headed households; can lead to overcrowding

What are some of the housing issues that the community is experiencing?

- CD: homelessness is a large problem
- KB: Not enough deed-restricted affordable housing

What do see as the biggest impediments to housing production? (Land, zoning, NIMBY, historic, regulatory process, environmental, infrastructure, etc.)

- MS: Residential Growth Allotment – adopted by voters in 2000 to restrict vote
 - People have tried to get exemptions; successful exemption was given to age restricted community
 - Community has "spoken loud and clear", they wanted to keep Tracy as is
- CD: "slow growth" focus for many years in Tracy; has not taken care of the people in the community; Seniors on SSI and retirement and they cannot make it on their own
 - Young people cannot afford to live in Tracy; single-income young people (first time homebuyers or affordable housing for younger people);
- CD: waiting lists are longer than people are saying
 - Waiting lists are even harder for people who may have ADA
 - Emergency shelter that is new even has a waitlist already
- KB: try to cut out the red tape to make it easier to build housing

What else can be done to produce housing for low- to moderate-income households?

- JB: have promoted "affordable by design"; smaller units, lot sizes, missing middles, extra ADUs built in; RGA exemption for missing middle
- CD: need for getting information to people who need it
- KB: need clear, simple information for seniors;

Can you identify or recommend any specific sites or geographic areas to build or locate high-density and/or affordable housing? (Vacant, underutilized, commercial, industrial, institutional, etc.)

- KB: one down on "Valpico"
 - Why does the City allow buildings to stay vacant?

Would you like to share anything else with us today?

- City has made it difficult for businesses to come into the City

Takeaways:

- Regional Growth Allotment is a constraint to growth
 - Need more exemptions; exemptions for smaller units?
- Encouraging senior housing
- Lack of affordable housing stock
 - Lack of deeply affordable housing stock
 - Lack of housing for persons with disabilities

Focus Group #3 – April 19, 2023 12:00 PM (Group A)

Facilitator: Cameron Savoie (Michael Baker Intl.)

Individual	Organization/Affiliation
Mary Mitracos	Grew up here, currently a real estate broker. Manages about 50 units – mostly "lower-end" housing. Former planning commissioner.
Pete Mitracos	Former Planning Commissioner, has worked on General Plan updates including housing elements . Housing elements use to be a bureaucratic hoop to jump through – never had any consequence or oversight.
Dave Konesky	Tracy resident since 1975. Real estate broker and sits on the fair housing board.
Adam Cheshire	Program admin for San Joaquin Co. for homeless services. One of the only working on the homeless plan for the county.
David Butz	Director Forward Planning and Development at Bright development. Works closely with the city – mostly here for education on housing element purpose and process.
Trevor Smith	Former Home builder in San Joaquin Co – mostly in Stockton. Entitled mall development in Tracy. Consults for various home builders now.

Please describe your interest or involvement in housing issues and priorities for the City. Have you been involved in other City policy discussions (e.g., General Plan)?

- Get more housing built in the City, create affordable options for residents. Get people experiencing homelessness off the street and in more permanent housing / social services.

Please describe your top housing priorities for the City.

- Concerned with the City of Tracy and what they are not doing on housing. Has been waiting for decades regarding work force housing. Tracy has just started to consider inclusionary housing which is way behind the curve compared to other jurisdictions. Priorities are mixed with new Downtown Specific Plan / Housing Element – the two seem to contradict one another (the Downtown Specific Plan is developing mostly market-rate housing).
- Looking around the country to see what people are doing with their malls. There was a lot of work done to get the mall built but may be an opportunity for housing somehow since malls are failing across the US. Manteca has some lessons to be learned on this topic.
- Some developers are looking outside the city limits but still within the sphere of influence to build. Tracy can annex that kind of land to account for RHNA – especially since developers are looking to those areas anyways.
- Other developers are looking at land around the mall to develop.

What is the number one housing priority the City should try to address in the next 8 years?

- TCAC – tax credit application can help with this problem. Work with regional housing authority to issue tax credits and get housing built. Commit to Multi-Family housing that is built this way, on land that has been donated. Mass housing to address low capacity of housing and improve affordability.
- Mall is one of the biggest opportunities for this.
- One of the most effective ways to build housing is to enable the ability for people to build their own housing – through non-profits like habitat that use sweat equity.

Are there any geographic areas of the City with racial, ethnic, or income segregation? Describe the advantages/disadvantages that one area may have compared to another.

- Not racially divided city but economically so. There are fewer primarily English-speaking families in the core of the city however, “the city is relatively safe still”.
- Housing is so constrained that “white people” are living in the old part of the town (more impoverished) – southside Tracy in the areas that are primarily Spanish speaking.
- According to State resources – the city is mostly integrated racially.

What are some of the housing issues that the community is experiencing?

- Homelessness in Tracy or San Joaquin County is getting worse. Some people, mostly the most vulnerable, are finding some connections to permanent housing solutions. However, the vast majority are still not getting the resources they need – especially those experiencing chronic homelessness / those struggling with mental health issues.
- Lots of concerns regarding cost of housing as the biggest issue. Housing capacity and cost are directly related to homelessness. Demand for housing is not being met at all. People who grew

up here – their children can't afford to stay in the City – sometimes go out of state. The kind of housing that is affordable, isn't feasible to build for developers.

- Long-term residents / families, immigrants, seniors.

What factors may be contributing to or compounding these issues in the City?

- Cost and availability of housing. Lack of direction from local government and political leaders – no policies or funding for housing services.
- Healthy communities have a broad range of housing options or development types to create affordable housing but Tracy and the general region does not have this kind of broad range of housing.

How should the City address these issue(s) for the 2023-2031 housing element planning period?

- What is the point of this housing element if there are no teeth in the plan or consequence for not building to the RHNA. ADU is the only direction from the State that has any kind of affect on housing / affordability in the State. In Tracy – ADU's haven't moved the needle to improve capacity. Standards for this housing type is restrictive and also doesn't create a lot of housing.
 - Illegal ADU's are being built and should be counted somehow.
- Housing first approach to housing. Look to Santa Clara model for this type of approach.

What do see as the biggest impediments to housing production? (Land, zoning, NIMBY, historic, regulatory process, environmental, infrastructure, etc.)

- Processes – there are illegal ADU housing units being built and in some cases they are experiencing overcrowding there as well. Standards, fees are restrictive and act as impediments.
- NIMBYism part of the problem too.

Can you describe your experience with the City during the entitlement process?

- Very accommodating staff but their hands are tied. City council is limiting the process and has confused the process with Staff. Conflicting direction and communications from the council.

*What, if any, constraints and roadblocks did you experience in getting your project permitted?
(Inclusionary housing, parking requirements, fees, staff capacity)*

- Fees for housing has become a large roadblock.

How and why did you decide to pursue a project in Tracy? (Zoning, price of land, incentives, availability of land)

- Residential building is hard almost impossible in the City mostly because of the council. Process is very subjective and there is no certainty in the process. Residential building is very stressful in the City – so developers look to outside the city but most of the county isn't much better.

Can you identify or recommend any specific sites or geographic areas to build or locate high-density and/or affordable housing? (Vacant, underutilized, commercial, industrial, institutional, etc.)

- Most of the housing being built including a HUD senior housing project is being built downtown next to the grand theatre. Edgewood and the neighborhoods on the peripheries have more capacity for development.

Takeaways:

- Lack of affordable housing stock
 - Lack of deeply affordable housing stock
 - Lack of workforce housing stock
- City Council seen as a constraint during the development process
- Entitlement process can be a constraint
- West Valley Mall seen as an opportunity for the development of housing

Focus Group #3 – April 19, 2023 12:00 PM (Group B)

Facilitator: Shannon Liská (Michael Baker Intl.)

Individual	Organization/Affiliation
Karen Jordan (KJ)	Prop manager HBR Rentals, realtor, central valley association of realtors, on board of California state residential property managers
Susan Goulding (SG)	Crown and Key realty, broker in downtown, realtor for 20 years, lived in Tracy for 30 years, used to live on edge, now in middle
Chris Stump (CS)	Meritage land company, home builder in northern California, interested in Tracy market
Justin Derby (JD)	Meritage homes, working on a large project in town that includes residential
Nadia Costa (NC)	CEQA and land use entitlement attorney, involved in residential / nonresidential entitlement, represents Meritage homes

Please describe your interest or involvement in housing issues and priorities for the City. Have you been involved in other City policy discussions (e.g., General Plan)?

- KJ – affordable housing
 - Expensive even if below bay area pricing
 - Apartments almost as expensive as single family residences
- NC – affordability
 - Entitlement process is challenging / expensive / time consuming / uncertain
- NC – appropriate assumptions on identification of sites
 - Types of projects that can economically be built
- JD – recognize character of neighborhoods where sites are, no skyscrapers in SFH neighborhoods
- SG – affordability, cannot afford to live where grew up
 - Need apartment conversions, starter homes affordable condominiums for first time buyers
 - Teachers starting salary need housing

- People living in Modesto
- Suburban commuter community
- People commuting through Tracy – traffic issue
- Work force housing

Are there any geographic areas of the City with racial, ethnic, or income segregation? Describe the advantages/disadvantages that one area may have compared to another.

- KJ - South Tracy - Ellis, hidden lake housing costs are higher
- KJ - North Tracy – older homes, smaller, duplexes
 - Income segregation, not racial
- SG – has to do with age of housing built / size of housing
 - Correlation between income and school scores
- KJ – westside Tracy majority Hispanic
 - Historically more segregated than it is now
- SG – transportation / bus from Tracy Hills does not go all over town
- KJ – newer communities do not have easy access to amenities like walkable schools, grocery stores, transit
- KJ - Sikh temple draws certain populations

What are some of the housing issues that the community is experiencing?

- Empty apartments
- Access to resources
- Knowledge of transit system is limited / unknown
- New apartments on Valpico – 6 apartment buildings built, only 1 renting
- Lacking condo fourplex, duets
- Need housing with space acre of land / suburban feel
- Missing middle housing, support for first time homebuyers, crazy HOA fees, have more missing middle than lower or higher income housing
- First time homebuyers priced out of Tracy
 - More in Tracy Hills / Manteca
- Age of homebuyers are younger, 30 year old, housing for the younger demographic
 - Mixed-use
 - Commercial downstairs
 - Access to entertainment / restaurants
 - Place to live / work / play in same neighborhood

Are you aware of any program or policies that have been implemented to address some of these issues?

How are they working/how did they work? Would you suggest any changes to them?

- Dublin implemented and addressed infrastructure concerns
 - Mix of single family, duplex, condos
 - Attract different kinds of families
- River Island – parks, walking trails
 - Tracy doesn't have these amenities

- If no yards, need places to walk
- Affordable by design in Dublin
 - Beyond deed restriction
 - Just low price point – affordable by design – no deed restriction
- Maintain flexibility so developers can bring in affordable groups in creative ways
- Tracy neighborhood character is single family, pushback from community on skyscrapers / affordable housing

How should the City address these issue(s) for the 2023-2031 housing element planning period?

- Help facilitate development
 - RGA prevents building permits, moratorium
 - Causes concentration in Ellis, Tracy hills
 - Encourage annexation

Can you describe your experience with the City during the entitlement process?

- Positive – NC
 - City demonstrates commitment and understanding that development is positive for the community
 - RGA manages growth but is a significant impairment
- City values developers, understands that is how infrastructure / parks is paid for
- City has created opportunities to streamline processing / environmental review
 - If consistent with broader planning
 - If environmental review already done for HEU or specific plan as a whole
 - Streamline by removing infrastructure obligations at outset, impact fees – affordable component, innovative housing (single family on small lots) is expensive
 - Differentiate impact fees by build type
- JD – need more staff – bottlenecking
 - Staff, after saying everything is fine, changed minds on how things should look
 - Transparency early on fees / percent affordable
 - Great staff but need more
- Everything needs to comply with what council wants to see

*What, if any, constraints and roadblocks did you experience in getting your project permitted?
(Inclusionary housing, parking requirements, fees, staff capacity)*

- Staff capacity
- Fees
- Guidance on what is wanted

How and why did you decide to pursue a project in Tracy?

- Meritage – first time homebuyer builder
 - There is a lack in Tracy despite good locations in city
 - Opportunities for density more than Tracy hills
 - More opportunities for density, building, volume but in an affordable range

- Tracy has opportunity for building more affordable housing since there is a large market but not a lot available

What else can be done to produce housing for low- to moderate-income households?

- KJ - More support from city to attract developers
 - Have space / land already
 - JD – facilitate zones that will be annexed
 - That is where the land is
 - Carveouts around western boundary of city
- SG - Concern of I-580 commute to Bay Area
 - Gas prices make it worth it to live somewhere more expensive in a smaller home
 - Since Tracy on county line, Alameda County not working to serve the Tracy population
- KJ – commute is a deterrent, lack of access to Tracy
 - People moving to Antioch / Brentwood and using BART, Vasco
 - Manteca facilitated flow of traffic

Would you like to share anything else with us today?

- Lots of multigenerational households
 - Need space for caregivers, childcare, parents
 - Need cheaper housing with room for combined families
 - ADUs NOT above garages
 - Ground floor ADUs – none in Tracy on first level
 - Second master on ground floor to encourage aging in place
- Flexibility in avenues to solve problems
- New senior community – interesting to monitor progress
 - Supposed to be like the one in Manteca – but lots of houses with no amenities
 - No yards, no pools, no amenities, no clubhouses

Takeaways:

- Entitlement process is noted as a constraint
- Lack of diverse housing stock to support multigenerational families, workforce, first time homebuyers, and seniors
 - Affordable by design
- RGA is a constraint to growth
- Encourage annexation as a solution

Letters Received During 30 Day Public Review Period (October 5 – November 6, 2023):

Correspondence was received from:

- Meritage Homes
- BIA of the Greater Valley (City Response Included)
- Kaiser Permanente
- Hsiang Tseng
- Kenneth Stahl on behalf of Bright Development
- John Stanek, Integral Development of Tracy Hills



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Honorable Councilmembers & Commissioners of the City of Tracy,

Meritage Homes and its subsidiary MLC Holdings are very excited about the update of the City of Tracy's Housing Element. With every adopted Housing Element (HE) comes the opportunity for city driven direction on where the community would like to locate housing and what types of housing would be most beneficial. Meritage has been actively participating as a stakeholder in the discussions with the HE consultant. We hope that this process can result in a HE that allows for new families of all income levels to be able to participate in homeownership and become citizens of Tracy.

We believe that the project we have proposed for the Tracy Pavilion Site would be an excellent addition to the City's Housing Element Site Inventory and would help ensure the HE is favorable reviewed by the state Department of Housing and Community Development (HCD). Therefore, Meritage respectfully asks for the project to be included as a part of the Housing Element. Attached to this letter is some information from our land use counsel addressing the project's suitability for the City's Housing Element and how it might help the City meet its Regional Housing Needs Allocation.

Meritage and MLC Holdings have been working to add housing where it makes the most sense, adjacent to existing commercial areas with excellent access to transportation. MLC submitted an application for Tracy Pavilion in June 2022 and has since been working with the city planning staff to design a mixed-use project that will meet the growing housing demand with a large-scale community made up of medium density housing to meet the needs of young families and first-time home buyers. A Site Plan is attached to this letter for your review.

The project has evolved over the past two years and currently includes nearly 1,000 residences ranging from small lot single family homes to townhomes and apartments. The project would have robust parks and walking trails and integrate the housing into the surrounding retail and commercial. Grant Line Avenue would be improved and expanded, opening the door for additional commercial and retail to be incorporated into the community. Furthermore, the density of many of the communities and the apartments would align with the HE goal of providing housing for moderate and low income buyers and renters.

Given that the project has an application well underway to provide housing that would assist the City in meeting its RHNA allocation, we request that the City consider including Tracy Pavilion in its Housing Element Site Inventory. At the very least we ask that the Council and Commission please provide Meritage and staff with some direction regarding the desire to see a project move forward.

Thank you very much for your consideration.

Sincerely,

Justin Derby
Vice President
Meritage Homes



UNIT SUMMARY

50'X85' LOTS	- 147
45'X80' LOTS	- 173
42'X70' LOTS	- 174
CLUSTER HOMES	- 147
TOWNHOMES	- 150
APARTMENTS	- 156
TOTAL	947



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June 23, 2023

VIA E-MAIL

Alan Bell, Senior Planner
City of Tracy
333 Civic Center Plaza
Tracy, California, 95376
E-mail: alan.bell@cityoftracy.org

Re: Proposed Inclusion of Tracy Pavilion Housing Development Site in City of Tracy Housing Element Site Inventory

Dear Mr. Bell:

This letter is written on behalf of MLC Holdings to propose that the City of Tracy consider the Tracy Pavilion site for inclusion in the City's housing inventory as part of its 6th cycle Regional Housing Needs Assessment ("RHNA") housing element update. The site is a 129.7-acre property located in the City's Sphere of Influence, west of the Pavilion Parkway and Power Road intersection, comprised of Assessor's Parcel Numbers 212-040-13, 212-040-16, 212-040-71, and 212-040-74.

As you are aware, under the RHNA law, the City is required to identify sites that can realistically accommodate 8,830 homes over the eight year cycle from 2023-2031, including 2,994 in the very low income category and 1,879 in the low income category. In recent years, state law has become much stricter regarding what sites cities may include in their housing element inventories as "realistic" sites for the development of housing. For example, the state imposes a high bar for including nonvacant sites in the housing element inventory, and for re-using sites from a previous housing element. Gov. Code sections 65583.2(c). In determining what sites are realistic, cities must consider a variety of factors such as typical densities for residential development at a similar affordability level in the jurisdiction, accessibility of utilities, and the cumulative effect of local land use regulations on a site's development capacity. Gov. Code section 65583.2(c)(2). For all of these reasons, cities throughout the state are finding the process of identifying adequate sites to be a challenge. In those areas that have already completed the 6th cycle RHNA process, the state Department of Housing and Community Development ("HCD") has so far found the housing elements of nearly half of all jurisdictions to be inadequate. See HCD Housing Element Compliance Report, available at: <https://www.hcd.ca.gov/planning-and-community-development/housing-open-data-tools/housing-element-review-and-compliance-report>.

In order to assist the City in meeting its RHNA obligations, we suggest the City include the Tracy Pavilion site in its housing element inventory. The site is a vacant 129.7-acre parcel located within the City's sphere of influence that can accommodate hundreds of new homes. It is surrounded by a variety of uses, including commercial and high density residential. The site has been evaluated in the City's Municipal Service Review, which shows it can be served by the City public services and has been evaluated in the City's storm, water and park master plans. MLC, a developer with a proven track record of developing homes, has already engaged with the City through the submittal of Planning Applications for a tentative map, pre-zoning and annexation request. In addition, MLC and the City have initiated the drafting of a CEQA document for a housing development project at Tracy Pavilion that calls for the development of approximately 1,000 homes. The development would include on-site infrastructural improvements, as well as extensions of the City's existing utility lines. Though the site plan is still tentative and may be updated, it gives a general idea of what the Tracy Pavilion project may ultimately entail via a variety of residential densities.

According to HCD's Site Inventory Guidebook (attached as Exhibit A),¹ cities may include sites outside their territorial borders in the site inventory if the housing element includes a program committing to annex the site within the first three years of the planning period and evaluates the suitability of the site for accommodating a share of the RHNA, including factors such as consistency of annexation with policies of the Local Agency Formation Commission (LAFCO), actions to pre-zone the property prior to annexation, and so forth. (Dept. Of Housing & Community Dev., Housing Element Site Inventory Guidebook at 36 (June 10, 2020)). In this case, the Tracy Pavilion Site is located within the City of Tracy's sphere of influence, and as detailed above, MLC has initiated the entitlement processes to have the site pre-zoned and annexed by the City.

Considering that the site is vacant, in a good location with access to utilities and compatible with surrounding uses, within the City's sphere of influence, and already has a well-developed site plan proposed by a reputable developer, we think it is likely that HCD would consider the Tracy Pavilion site to be a realistic site for accommodating a significant share of Tracy's RHNA allocation, if the City committed to undertaking the annexation of the site in the first three years of the planning period and conducted the evaluation described in the preceding paragraph. Therefore, we request that you consider adding Tracy Pavilion to the housing inventory.

¹ The Guidebook is also available online at: https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf.

Mr. Alan Bell, Senior Planner
June 23, 2023
Page 3

If you have any questions about the contents of this letter or desire additional information, I am happy to discuss the project with you at any time. I can be reached by e-mail at ken.stahl@msrlegal.com, or by phone at (949) 688-2980.

Sincerely,

MILLER STARR REGALIA

Kenneth A. Stahl

Kenneth A. Stahl

KAS/kli



Building Industry Association of the Greater Valley

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(209) 235-7831 • (209) 235-7837 fax

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October 24, 2023

Mayor, Council and Planning Commission
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

Mayor Young,

The BIA is taking an unprecedented step tonight in asking you, the City Council and the Planning Commission to reject the proposed Housing Element. We do not take this step lightly. But it has been brought to our attention from multiple builders and developers that the City has become decisively anti-housing.

Without taking any formal action through the Council or the Planning Commission, city staff has taken it upon themselves to slow down residential building to such a degree that the city itself is now a governmental constraint on the production of housing.

The Housing Element requires constraints to be analyzed and the proposed housing element misses the mark in two glaringly large ways.

Section III – Housing Constraints

B – Government Constraints

1. Transparency in Developmental Regulations; To increase transparency and certainty in the development application process as required by law, the City provides a range of information online for ease of access.

In reality the City of Tracy is anything but transparent when it comes to how they implement their development regulations. The following are three examples of how the city has refused to work with the development community and has taken a cavalier attitude towards residential development.

Inspection Improvement Agreements are not being accepted by the city. Although no formal action has been taken there is a de facto ban in place on Inspection Improvement Agreements. This is unnecessarily causing large delays on projects.

The city has delayed or refused to explain why final maps are being held up with no explanation regarding which conditions of approval are at issue.

Projects which were approved upon condition of forming a benefit district are being held up because the city now says they do not do benefit districts. This ad hoc change of policy has occurred with no formal action taken.

Section III – Housing Constraints

B – Government Constraints

8. Local Permits and Processing Times; The processing time needed to obtain development permits and required approvals is commonly cited by the development community as a prime contributor to the high cost of housing. Depending on the magnitude and complexity of the development proposal, the time that elapses from application submittal to project approval may vary considerably. Certainty and consistency in permit processing procedures and reasonable processing times is important to ensure that the development review/approval process does not discourage developers of housing or add excessive costs (including carrying costs on property) that would make the project economically infeasible. The City is committed to maintaining comparatively short processing times. Total processing times vary by project, but most residential projects are approved in three to eight months.

In reality the City of Tracy frequently exceeds the three to eight month time frame by many multitudes. The excessive delays in getting final maps approved is a governmental constraint that has resulted in discouraging developers of housing and adding excessive costs including carrying cost that have made new residential projects in Tracy economically infeasible. The following are actual projects and how long they were delayed, the specific names to each of these projects will be added when this letter is submitted to HDC. City staff is familiar with the dates on these projects. In chronological order:

Project #1

Tentative Map Submittal – 2018
Tentative Map Approval – Nov 10, 2020 (23+ months)

Project #2

Tentative Map Approval – May 15, 2018
Final Map Approval – October 4, 2022 (53 months)

Project #3

Tentative Map Approved – May 8, 2019
Final Map Approved – June 1, 2021 (24+ Months)

Project #4

Tentative Map Submitted – 2019
Final Map Approved – January 17, 2023 (36+ Months)

Project #5

Tentative Map Approved – Nov 10, 2020
Final Map Approved – Oct 19, 2021 (11 Months)

Project #6

Tentative Map Approved – November 10, 2020
Final Map Approved - October 19, 2021 (11 Months)

Project #7

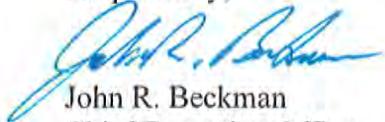
Tentative Map Approved – November 10, 2020
Final Map Approved – January 17, 2023 (26 Months)

Project #8

Tentative Map Submittal – January 2021
Tentative Map Approval – March 2022 (14 Months)
Final Map Approved – (Still Processing for 18+ Months)

These excessive delays have caused at least one national home builder to pull out of future land purchasing agreements in Tracy. Until affirmative actions are taken to bring these delays back into industry standard norms the City of Tracy, as it currently operates, is a governmental constraint on home building.

Respectfully,



John R. Beckman
Chief Executive Officer

City Response to BIA Letter

1. **BIA Comment:** *"In reality the City of Tracy is anything but transparent when it comes to how they implement their development regulations. The following are examples of how the city has refused to work with the development community and has taken a cavalier attitude towards residential development."*

Response:

This comment does not identify a specific deficiency in the Draft Housing Element, nor particular governmental constraints to housing development within the City. The Housing Element is a land use planning instrument and is not intended to address generalized complaints and dissatisfaction stemming from specific project applicants. The City is unaware of any instance of the City "refusing to work with the development community" or taking "a cavalier attitude toward residential development." Contrary to BIA's assertion, the City prides itself on efficiently reviewing and processing development and business friendly, as reflected in the rapid residential growth (and industrial development) experienced by the City since the last Housing Element Update.

2. **BIA Comment:** *"Inspection Improvement Agreements are not being accepted by the city. Although no formal action has been taken there is a de facto ban in place on Inspection Improvement Agreements. This is unnecessarily causing large delays on projects."*

Response:

This comment seems to misunderstand legal requirements related to the mapping processes. Inspection Improvement Agreements (IIAs) are neither legally required to be employed by a city as part of the mapping process, nor a practice used elsewhere in the State. As explained below, the City's decision to stop issuing IIAs brings the City in line with the law as well as other jurisdictions in the State.

State law authorizes ordinary "Improvement Agreements" to complete required public improvements that have not been completed by applicants prior to the approval of final maps. (See Gov. Code § 66462). In compliance with State law, the City routinely affords applicants more time to complete requisite improvements (to the extent permissible under other laws, such as the California Environmental Quality Act (CEQA)) by entering into Subdivision Improvement Agreements or Offsite Improvement Agreements, so as to allow final maps to be timely approved.

Inspection Improvement Agreements ("IIAs") are a unique instrument that City staff began utilizing in more recent years to allow applicants to proceed with a subset of work contained within a larger plan set that was still under staff review. IIAs are not industry standard or even a reflection of best practices. More importantly, the Tracy Municipal Code, which identifies the legally sound agreements that staff may use (in compliance with State law), neither requires nor *explicitly permits* the use of IIAs as a means of complying with State and local mapping requirements. The City has experienced many issues with IIAs and has, now, discontinued the practice of issuing new IIAs. This decision simply puts the City in better compliance with law and industry practice.

3. BIA Comment: *"The city has delayed or refused to explain why final maps are being held up with no explanation regarding which conditions of approval are at issue."*

Response:

Under State law, the approval of a final map is a ministerial action of the legislative body, that can be taken only upon the satisfaction of all conditions of approval set forth in a tentative map. As noted above, State law affords an exception to full satisfaction, only where public improvements have not been completed and where a legally sound agreement is being executed concurrently or in advance of map approval. It is the obligation of the applicant, not the City, to meet those conditions of approval. As required by law, it is the City's policy and practice to clearly state all conditions of approval in a tentative map. Applicants have the burden of satisfying these conditions, and they control the timing of completion, not the City. The City has been unable to approve certain final maps because full satisfaction of requisite conditions has not occurred.

4. BIA Comment: *"Projects which were approved upon condition of forming a benefit district are being held up because the city now says they do not do benefit districts. This ad hoc change of policy has occurred with no formal action taken."*

Response:

The City understands this comment to refer to a particular example unique to a particular applicant, not a City policy or practice. This comment evidences a fundamental misunderstanding of the legal principles underlying benefit districts. Where an applicant completes a public improvement that creates benefits extending to other property owners beyond the legal nexus of its own project, the City allows such applications to form a benefit district enabling that applicant to obtain prorated reimbursement from such other property owners. However, if an applicant completes a public improvement that is within the City's Master Plans, then applicants receive fee credits and reimbursement for such improvements pursuant to Tracy Municipal Code. Applicants are not entitled to both a benefit district and a fee credit, nor can applicants decide which they seek as the decision is dictated by the law.

5. BIA Comment: *"In reality the City of Tracy frequently exceeds the three-to-eight-month time frame by many multitudes. The excessive delays in getting final maps approved is a governmental constraint that has resulted in discouraging developers of housing and adding excessive costs including carrying costs that have made new residential projects in Tracy economically infeasible. The following are actual projects and how long they were delayed, the specific names of each of these projects will be added when this letter is submitted to the HDC [sic]. City staff is familiar with the dates on these projects."*

Response:

This comment misconstrues a future goal of processing times for particular approvals, for an "industry standard" time for completion of entire projects, irrespective of size and conditions. The three-to-eight month processing time stated in the draft Housing Element is the approximate time for the discretionary actions of "most housing projects," not subdivision agreements and ministerial actions such as final maps cited in the BIA

comment letter. The Draft expressly states processing times vary by project and that “[a]ll projects are assumed to have proper general plan, zoning, and CEQA clearance.” The approximate time estimates also pertain to types of *approvals*, of which there may be several in a larger project. Projects vary in size, scale, number and type of conditions.

The BIA letter claims eight project examples but does not identify the projects. Instead, the BIA letter states, “...names to each of these projects will be added when this letter is submitted to HDC (sic).” The City has attempted to identify the BIA’s list of projects based on the dates provided in the BIA letter.

It appears that Project #1 is the Tracy Hills Phase 1B Vesting Tentative Map. Following is a summary of key events in the City’s review of that project.

- October 24, 2018 – Developer submitted Tracy Hills Phase 1B Vesting Tentative Subdivision Map application
 - Phase 1B Vesting Tentative Map included approximately 432 single-family lots in Phase 1B area
 - City comments sent to applicant on December 12, 2018. In addition to providing detailed comments on the Vesting Tentative Map, City comments included the point that General Plan Amendment (GPA) and Tracy Hills Specific Plan Amendment (SPA) were required to change land use designations from commercial to residential.
- April 8, 2019 – Developer submitted GPA and SPA applications for Tracy Hills Phase 1B/1C area
- April 17, 2019 – Developer submitted a response to comments and revised Vesting Tentative Map
- May 28, 2019 – Kick-off meeting/phone call with staff/developer/Kimley Horn to discuss starting CEQA review and traffic scope
- August 13, 2019 – Meeting held with staff/developer/Kimley Horn to discuss the findings of traffic analysis
- September 2019 – Developer requested that the applications for Tracy Hills Phase 1B/1C be placed on hold to address traffic analysis and off-site traffic improvement options, and also to re-evaluate the proposed lot and product mix of Ph1B & 1C
- March 5, 2020 – Developer requested that the City resume work on the Tracy Hills Phase 1B applications.
- March 12, 2020 – City comments sent to Developer regarding the proposed GPA, SPA, and Tracy Hills Phase 1B Vesting Tentative Map applications
- August 10, 2020 – Developer submitted revised GPA application materials in response to City comments
- October 1, 2020 and October 2, 2020 – Developer submitted revised SPA application materials in response to City comments
- October 7, 2020 – Developer submitted revised Vesting Tentative Subdivision Map in response to City comments
- October 14, 2020 – Planning Commission conducted a public hearing and recommended approval of the Tracy Hills Phase 1B project (GPA, SPA, and Vesting Tentative Map) to the City Council
- November 10, 2020 – City Council approved the Tracy Hills Phase 1B project (GPA, SPA, and Vesting Tentative Map)

All delays involved in the processing of this application were caused by the following:

1. Developer not submitting the required GPA and SPA applications at the time of submitting application for Vesting Tentative Map
2. Developer needing time to address Engineering findings of the traffic analysis and off-site improvement options
3. Developer placing the application on hold for six months during the time period of September 2019 to March 2020
4. Developer not submitting final versions of the GPA until August 2020 and final versions of the SPA and Vesting Tentative Map until October 2020, which was in response to City comments provided in March 2020

Project Numbers 2 through 7 appear to be ministerial actions such as final maps and subdivision agreements, not discretionary projects subject to public hearings. These types of projects are scheduled for approval as soon as the developer complies with all relevant conditions of approval and other requirements. Timing for these types of actions are dependent upon the developers' responsiveness to City requirements.

Project #8 appears to be the Avenues Vesting Tentative Map. The application was submitted on January 25, 2021. The developer made multiple revisions following their initial application. Each review took the City less than 30 days, except for during the 4th review when we were working on drafting conditions/staff report and responding to an unexpected revision to the map submitted by the applicant, which led to a 5th review cycle and meetings that the applicant requested with the CMO regarding the draft conditions. The project moved along at a pace where each party was very responsive, with the longest time being approximately four months as we waited for the applicant to revise and resubmit in response to our comments on their 2nd submittal. A detailed description of submittal and correspondence dates is attached above.

As noted above, applicants largely control final map approval times, as they must demonstrate satisfaction of all conditions of approval. The list identified in the BIA letter notes time periods between tentative map approval and final map approval, but it does not provide any relevant context such as the scale of such projects, including the number of conditions that needed to be satisfied in each instance by the respective applicants.

6. BIA Comment: *"These excessive delays have caused at least one national home builder to pull out of future land purchasing agreements in Tracy. Until affirmative actions are taken to bring these delays back into industry standard norms the City of Tracy, as it currently operates, is a governmental constraint on home building."*

Response:

The City cannot verify or respond to the allegation that delays in processing times have caused "at least one national home builder to pull out of future land purchasing agreements in Tracy." As we all understand, a myriad of factors ultimately affect the progress of development, including the overall economy, interest rates, and the costs of land and construction.

The comment's reference to "bringing these delays back into industry standard norms" is unfounded. As explained above, the City continues to be pro-development and business friendly, as witnessed by the explosive growth seen in the City in recent years. The

City reaffirms the stated goals in the Housing Element and will ensure that the City's practices remain consistent with both applicable industry standards and the law.



SENT BY ELECTRONIC MAIL

October 30, 2023

Alan Bell, Senior Planner
City of Tracy, Development Services Dept.
333 Civic Center Plaza
Tracy, CA 95376

Alan.Bell@cityoftracy.org

RE: City of Tracy 2023 - 2031Housing Element Update – Public Comment

Dear Mr. Bell:

Kaiser Permanente thanks the City of Tracy for the opportunity to comment on the 2023 - 2031 Housing Element Update. Kaiser Permanente owns and operates the Kaiser Permanente Tracy Medical Offices located at 2185 W Grant Line Rd. This site serves the community by providing a full range of primary and specialty outpatient care and services. A portion of the site, discussed below, is undeveloped land that Kaiser Permanente has identified as a future build out opportunity to serve the growing Kaiser Permanente membership in Tracy and the surrounding area.

The draft 2023 - 2031 Housing Element identifies 2.9 acres of the 2185 W. Grant Line Rd. (APN 214-020-290) site in the Sites Inventory as suitable for 51 units. Kaiser Permanente's intention is to maintain this land for future medical office expansion and there are no plans to dispose of this property.

Kaiser Permanente is an active and long-standing member of the Tracy community. We remain committed to providing high quality health care to our members and to the health of the broader community we serve. Based on Kaiser Permanente's current strategic planning discussions and the viability of the property as a future medical office expansion opportunity, Kaiser Permanente is not in a position to dispose of the site discussed above or immediately develop the site with residential uses by the 2031 Housing Element planning horizon. Therefore, it is requested that the above site be removed from the 2023 - 2031 Housing Element Sites Inventory.

We recognize the complexities associated with evaluating local housing needs and preparing a realistic set of policies and programs to fulfill those needs and appreciate the opportunity to comment on the process. Kaiser Permanente looks forward to future discussions and planning efforts for expansion of the Tracy medical offices both internally and with City staff.

Sincerely,

Tina X.
Wehrmeister
Digitally signed by: Tina X.
Wehrmeister
Date: 2023.10.30 16:34:22-
0700

Tina Wehrmeister
Senior Land Use Manager

cc: Aphriekah DuHaney-West, Sr. Vice President & Area Manager
Deborah Pitts, Director, Public Affairs
Andrew Mendoza, Manager, Community & Government Relations

One Kaiser Plaza, 22nd Floor
Oakland, CA 94612
(341)766-4284
tina.x.wehrmeister@kp.org

November 6, 2023

VIA E-MAIL

Senior Planner Alan Bell
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
alan.bell@cityoftracy.org

Re: Objection to Inclusion of Property in Site Inventory List (APN 251-050-080)

Dear Mr. Bell:

I own the 104.1-acre parcel located at 27901 North Lammers Road, with APN 251-050-080 (the “Property”). I am writing to object to the inclusion of the easterly five-acres of my Property as a RHNA opportunity site, and to further object to the City of Tracy’s failure to specifically first notify me.

In preparing the Draft Housing Element, the City appears to have not met its obligations under the Housing Element Law because it has failed to coordinate with the impacted property owners. This is particularly true in regards to my Property since I have no intention of developing the Property at the densities proposed in the Draft Housing Element.

1. The City has Failed to Provide the Requisite Information in the Site Inventory List

It is my understanding that under the relevant terms of the Housing Element Law, the City is to provide a site inventory defining those sites the City believes will be able to accommodate their relevant housing needs during this planning period. Furthermore, as part of the site inventory, the City is obligated to calculate the projected residential development capacity of the sites that can be “realistically achieved.” (Gov’t Code 65583.2.) The City can meet this requirement by basing its determination “on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583, the *realistic development capacity for the site*, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.” (Gov’t Code 65583.2(c)(2).)

Furthermore, when the property is nonvacant (including underutilized sites), “the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential.

Senior Planner Alan Bell

November 6, 2023

Page 2

The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites." (Gov't Code 65583.2(g)(1).) Additionally, the Department of Housing and Community Development ("HCD") released a June 10, 2020 Memorandum¹, and explained that when assessing nonvacant sites, such as the Property, the City has an obligation to provide additional details such as whether the owner would be interested in rezoning in their property in such a way. (See June 10, 2020 Memo, p. 25.)

Based on the foregoing, it is clear that the City should have at least attempted to contact the owners of property that the City wished to include in its site inventory so that it could include the requisite information in the Draft Housing Element. By failing to conduct this outreach, it appears that the City has failed to comply with the requirements of the Housing Element Law, and we would expect HCD to require the City to perform this outreach through the next draft.

Indeed, had the City conducted the required outreach with the relevant owners prior to drafting the Housing Element's site inventory list, the City would have learned that there is zero likelihood that the 5-acre parcel designated in the site inventory list would be developed at the densities proposed by the Draft Housing Element. At this point in time, the Property is under contract to be sold and developed in accordance with the City's existing Medium Density Residential standards. Should the Property be rezoned, I believe that the purchase and sale agreement will fall through.

Accordingly, because I will not develop my Property at the densities contemplated by the Draft Housing Element's High Density Residential standards during this next Housing Element Cycle, my Property should be removed from the Draft Housing Element in its entirety.²

¹ Available here: <https://www.hcd.ca.gov/planning-and-community-development/hcd-memos>

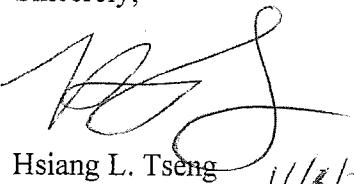
² Additionally, while the Draft Housing Element describes my Property as vacant in some parts, Table B of the Draft Housing Element in the appendix describes the Property's existing use as Agriculture. These statements need to be reconciled.

Senior Planner Alan Bell
November 6, 2023
Page 3

2. Conclusion:

As the owner of the 5-acre parcel of land located at 27901 North Lammers Road, I respectfully request that the City remove my Property from the site inventory list before the Draft Housing Element is submitted to HCD for its consideration.

Sincerely,



Hsiang L. Tseng 11/6/23



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ken.stahl@msrlegal.com

November 6, 2023

VIA E-MAIL

Alan Bell, Senior Planner
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333 Civic Center Plaza
Tracy, California, 95376
E-mail: alan.bell@cityoftracy.org

Re: Additional Comments on Draft Housing Element Update

Dear Mr. Bell:

This letter is written on behalf of Bright Homes, in follow-up to our October 24, 2023 letter containing Bright's initial comments on the City of Tracy's draft housing element update (HEU), which is attached as Exhibit A. Bright appreciates the opportunity to continue to actively participate in the City of Tracy's housing element update process, and is excited to work collaboratively with the City to provide much-needed housing for the City. Bright's October 24 letter contained its initial thoughts on the draft HEU. By this letter, we provide some additional comments for the City's consideration, and anticipate staying engaged as a long-time community stakeholder as the City continues to move through this process.

As a preliminary matter, Bright would like to reiterate the concerns raised in our October 24 letter and respectfully request that the next draft of the HEU expressly address the comments contained in our October 24 letter, as well as this letter.

Second, Bright appreciates your invitation to discuss further our thoughts on appropriate locations for housing opportunity sites. After discussions with our technical consultants at Wood Rodgers, we have the following additional comments in this regard.

As noted in our October 24 letter, the City identified a ten-acre portion of a 48.7-acre parcel in which Bright has an interest as an opportunity site for 298 homes in the lower-income category, at a density of approximately 29 homes per acre. (Draft HEU at IV-11). To accomplish this, the City anticipates rezoning the 10-acre site from Planned Unit Development to High Density Residential (HDR). While Bright does not disagree with the rezoning of a portion of this land to HDR and its identification as an opportunity site, we believe the City should shift the location

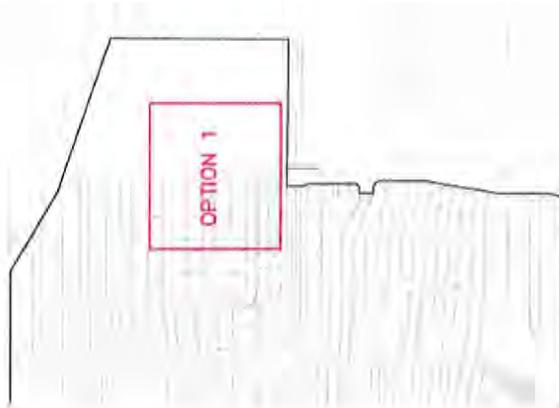
such that it would better promote the realistic, future development of the balance of Urban Reserve 7.¹

At present, Bright does not believe the proposed ten-acre location is a feasible location for an HDR opportunity site, for these reasons:

- It creates an undevelopable triangular remnant to its north.
- The proposed location encroaches into the City's Storm Drain Master Plan Site for Detention Basin 3B.
 - Please note that the proposed location has the lowest vertical elevation within Urban Reserve 7 (this is why the planned Detention Basin 3B is located there).
- Building out HDR residential uses at this location would appear to create compatibility concerns with the surrounding single-family residential uses. Neighbors may be particularly sensitive to the proposed high-density use if located to close to their homes. In particular, the adjacent homes along Tennis Lane and Faith Lane may not be adequately buffered. Further, this proposed location seems to connect the site to the existing Babcock Lane which would introduce potential adverse impact for that neighborhood.

With all of this in mind, since our last communication, we have worked with Wood Rodgers and further evaluated a number of different possible locations within the 48.7 acre parcel for the 10-acre opportunity site. Below we have identified two possible sites, referenced as Option 1 and Option 2.

Option 1

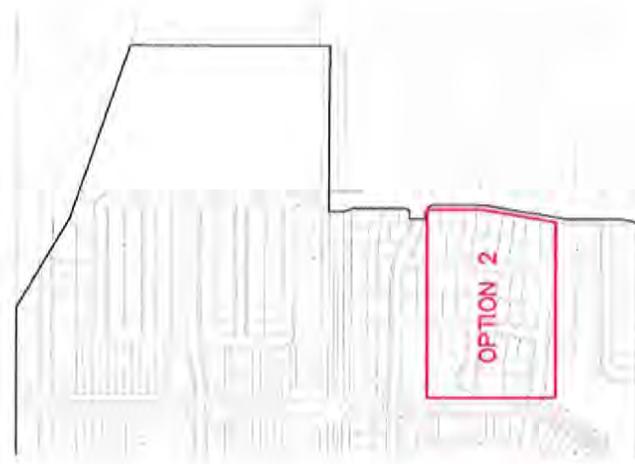


¹ Relatedly, we recommend that the City defer the proposed expansion of Schulte Road until after development of the balance of Urban Reserve 7.

Option 1 resolves several of the issues we have outlined above with the City's proposed housing opportunity site:

- The HDR use would be located a minimum of 275 feet from Tennis Lane and Faith Lane rear yard fences.
- There is additional space for locating more compatible residential uses next to existing single-family homes, including, but not necessarily limited to, the park/basin.
- In addition, an access from or to Babcock Lane would not be required.
- The adjusted location allows the balance of Urban Reserve 7 to be master planned and does not create undevelopable remnant areas.
- This location allows for the City's Storm Drain Master Plan Site for Detention Basin 3B, thereby keeping the basin at the lowest elevation of the site.
- Main entry of the site could occur at the Mabel Josephine intersection promoting efficient access to and from the site via W. Schulte Road.

Option 2



Option 2 also addresses several of the issues we have outlined above with the City's proposed housing opportunity site:

- The HDR use is adjacent to an elementary school parking lot with parking structures making the school within walking distance.
- The infrastructure in this area is mostly completed.

- As reflected, this site would abut a future roadway.
- There is a planned park area to the southwest of the site which would serve as a further buffer to any existing residential uses to the west.
- There would be flexibility for future planning to provide for additional buffering from adjacent uses.

Once again, we greatly appreciate your consideration of these comments and your diligence in preparing the draft HEU. We understand the City is under significant time constraints in preparing the HEU and are hopeful that we can assist the City in expeditiously preparing an HEU that will meet with approval by the state. Please be advised that given those time constraints required us to provide these comments in a relatively quick time frame coupled with our client's desire to continue to remain actively engaged in this process, we anticipate that we will have additional comments on the draft HEU as this process evolves.

If you have any questions about the contents of this letter or desire additional information, I am happy to speak with you at any time. I can be reached by e-mail at ken.stahl@msrlegal.com, or by phone at (949) 688-2980.

Sincerely,

MILLER STARR REGALIA

Kenneth A. Stahl

Kenneth A. Stahl

KAS/kli

cc: Midori Lichtwardt, City of Tracy Interim City Manager
William Dean, City of Tracy Assistant Director of Development Services
Nadia Costa
Clients

EXHIBIT A



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October 24, 2023

VIA E-MAIL

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Tracy, California, 95376
E-mail: alan.bell@cityoftracy.org

Re: Initial Comments on Draft Housing Element Update

Dear Mr. Bell:

This letter is written on behalf of Bright Development dba as Bright Homes ("Bright"), which has been active in developing numerous properties within and around the City of Tracy for over 30 years. Bright appreciates the opportunity to participate in the City's Housing Element Update process and review the City's recently released draft Housing Element Update (HEU).

Bright is committed to delivering high-quality communities containing housing available to a range of income levels, along with associated benefits to the City of Tracy and its residents. Among these benefits, Bright's addition of new homes to the Tracy community will assist the City in meeting its obligations under the Regional Housing Needs Assessment/Allocation (RHNA) law. In the spirit of cooperation with the City toward meeting these goals, we provide these few brief preliminary comments and questions regarding the HEU for the City's consideration in anticipation of the Special Meeting on October 24, 2023. Please note that since the comment period does not end until November 6, 2023 that Bright may have additional comments before the comment period concludes.

1. We observe that the City has identified a ten-acre portion of a 108.7-acre parcel (APNs 240-050-370 and 240-040-030) in which Bright has an interest as an opportunity site for 298 dwelling units in the lower-income category, at a density of approximately 29.75 homes per acre. (Draft Housing Element at IV-11). To accomplish this, the City anticipates rezoning the 10-acre site from Planned Unit Development to High Density Residential (HDR). While we are excited about the prospect of developing that 10-acre parcel and having it included in the HEU as an opportunity site, we are skeptical that housing at such a high density would work in that location, especially given its proximity to existing lower-density housing developments.

To date, Bright notes that the specifically designated location on page IV-11 of the HEU has been considered lower density zoning and/or a storm drainage basin / park / open space.

We are happy to have further conversations with City staff about how that site, as well as the surrounding vacant 108.7-acre parcel, could be developed in a manner that would fit in with the surrounding community and assist the City in meeting its RHNA obligations.

2. As the City considers the HEU, Bright notes the City's reference to the fact that "south of this site there is a recently completed multi-family housing by Bright Homes". (Draft Housing Element at IV-11.) Bright believes that this project was successful and well-received by the community. However, Bright notes the net du/acres for that site was only about 50% of what is proposed for the new HDR. The HEU proposes a change of MDR to 20 du/acre and HDR as 20-35 du/acre. (Draft Housing Element at IV-4.) The 20 du/acre is much closer to the density of the referenced project.
3. As an aside, we note that in the event the City were to designate the site for 298 homes and a developer proposed a development with fewer than 298 homes, under the "no net loss" statute, the City would not be permitted to deny the development on the grounds that it would trigger a requirement for the City to rezone other sites to meet the unmet RHNA share. See Gov. Code § 65853(c)(2); HCD No Net Loss Memorandum, Oct. 2, 2019, at 8, 10 <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb-166-final.pdf> (stating that a jurisdiction may not deny a housing development on the grounds that approval would trigger the identification or zoning of additional sites to meet the RHNA).
4. According to the City's Residential Growth Management Ordinance, any homes that the City counts towards its RHNA obligations are exempted from the annual Residential Growth Allotment (RGA) (Mun. Code section 10.12.065). We would like to confirm that the City shares our understanding that any homes counted towards the RHNA are not included in the annual RGA.
5. While the draft HEU commits the City to subsequently rezoning the 10-acre site to HDR, we suggest that, if the City chooses to go forward with any rezoning, it consider rezoning the site concurrently with the adoption of the housing element to avoid undue delays. As noted in our first point, however, a rezoning to HDR may not be necessary as a smaller development may be more appropriate for the site.
6. To date, the City has not confirmed what kind of CEQA document it intends to process for the HEU and possible rezoning. We would appreciate clarity regarding the City's plans on this score.
7. Bright or Bright-related entities have interests in several sites, totaling approximately 354 acres, just outside the City's territorial boundaries, with APN #'s 209-260-13, 240-020-01, 240-020-07, and 240-040-06. These sites are located within the 10-year horizon of the City's sphere of influence, and one of the sites is an unincorporated "island" surrounded on all sides by the City. (Tracy Sphere of Influence Map, San Joaquin County LAFCO, https://www.sjlafcoco.org/files/5e1df2dcb/Tracy_Sphere_2023.pdf).

We suggest that the City consider these sites in its HEU as housing opportunity sites to absorb a share of the RHNA. According to HCD's Site Inventory Guidebook,¹ cities may include sites outside their territorial borders in the site inventory if the housing element includes a program committing to annex the site within the first three years of the planning period and evaluates the suitability of the site for accommodating a share of the RHNA, including factors such as consistency of annexation with policies of the Local Agency Formation Commission (LAFCO), actions to pre-zone the property prior to annexation, and so forth. (Dept. Of Housing & Community Dev., Housing Element Site Inventory Guidebook at 36 (June 10, 2020)). In this case, the sites are located within the City's sphere of influence in the 10-year horizon, so it is already contemplated that the sites may be annexed by the City. Therefore, if the City committed to undertaking the annexation of the site in the first three years of the planning period and conducted the evaluation described in the preceding paragraph, HCD may consider them to be realistic sites for accommodating a significant share of Tracy's RHNA allocation.

In addition, in the Master Planning that Bright has worked on with its consultants (at the request of the City) in contemplation of developing all the above-mentioned properties with a holistic approach to same, the site plans depict property along Schulte and south of 11th Street with HDR as such locations are more appropriate for higher density uses due to its location and surrounds.

Therefore, we request that you consider adding these sites to the housing inventory (i.e. APN #'s 209-260-13, 240-020-01, 240-020-07, and 240-040-06).

We greatly appreciate your consideration of these comments on your diligence in preparing the draft HEU. These are just our initial thoughts on the recently released draft, and we look forward to providing additional comments once we have had a chance to review the HEU more thoroughly. If you have any questions about the contents of this letter or desire additional information, I am happy to speak with you at any time. I can be reached by e-mail at ken.stahl@msrlegal.com, or by phone at (949) 688-2980.

Sincerely,

MILLER STARR REGALIA

Kenneth A. Stahl

Kenneth A. Stahl

KAS:kli

cc: Clients
Nadia L. Costa

¹ The Guidebook is available online at: https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf.



November 7, 2023

**VIA E-MAIL AND
FIRST CLASS MAIL**

Honorable Mayor & Councilmembers
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
PublicComment@CityOfTracy.org

Senior Planner Alan Bell
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
alan.bell@cityoftracy.org

Re: Tracy Hills' Comments on Draft Housing Element

Dear Honorable Mayor, Councilmembers & Mr. Bell:

This letter is being sent on behalf of Integral Communities and its various affiliates ("Tracy Hills"), the current owner of those properties generally referred to as the Tracy Hills Project (or "Property"), and is being sent in response to the Draft Housing Element that was circulated in early October 2023.

As an initial matter, I would like to state my appreciation for allowing the public to comment on this draft as Tracy Hills looks forward to working with the City to help meet its housing goals and mandates. However, while we commend the City for delaying consideration of the housing element to conduct additional public workshops this past summer, as required by the City Attorney, as explained below, Tracy Hills wishes that City Staff had more direct and open communication with us specifically regarding the Draft Housing Element issues and opportunities in regards to Tracy Hills.

In particular, the Draft Housing Element identifies five properties as opportunity sites that are owned by Tracy Hills and are supposedly going to be rezoned to accommodate higher levels of residential density.¹ However, these properties are subject to a Development Agreement between the City and Tracy Hills, and as such, these new zoning restrictions would not be applicable to those five properties. Therefore, it is improper to rely on those sites to provide the levels of density that the Draft Housing Element appears to assume will be accommodated at those sites within the upcoming housing element cycles.

This is not to say that Tracy Hills is not willing to work with the City, but these issues do need to be addressed to avoid any miscommunication in the future.

¹ APN 25105009, 25106016, 25337001, 25338052, and 25338053.

Honorable Mayor & Councilmembers
Senior Planner Alan Bell
November 7, 2023 Page 2

1. The Draft Housing Element Must Be Revised to Reflect the Existence of the Development Agreement that Applies to the Tracy Hills Parcels

The Draft Housing Element should be revised to omit any Tracy Hills property that is subject to the Development Agreement entered into by the City of Tracy, effective May 19, 2016 (San Joaquin County Recorder No. 2016-066658) (the “Development Agreement”). The Development Agreement vested the property owners with the right to develop those properties in accordance with the zoning regulations that existed at that time, meaning those properties cannot be required to be developed in accordance with the newly proposed densities during the current planning period. Accordingly, including those properties in the Draft Housing Element’s site inventory list is improper.

Per Government Code § 65583.2, the City is required to analyze and explain how the properties that are included in the site inventory list can accommodate the development of the City’s RHNA allocation during this current “planning period.” (See Gov’t Code §§ 65583.2 (a), (c).) HCD states that this Sixth Cycle will run from December 31, 2023 to December 31, 2031. Accordingly, the City is required to include only those sites that will realistically be developed at the desired densities by no later than December 31, 2031.

Additionally, when designating a site as an opportunity site, the City is required to explain how a site can be developed to accommodate the contemplated densities after taking into account any potential “land use controls,” as well as the “realistic development capacity for the site,” with the goal to show that the identified sites can realistically be developed at those density levels during this planning period. (See Gov’t Code 65583.2(c)(2).) Here, it is apparent the City failed to conduct this analysis by ignoring the existence of the Development Agreement, which makes it unlikely if not legally impossible to do.

As you are likely aware, the Development Agreement applies to approximately 1,843 acres of real property in the Tracy Hills Specific Plan. (See Development Agreement, Recital D.) Per the terms of the Development Agreement, it is intended to last for a total of 25 years at minimum, with an outside date of May 19, 2041. (See Development Agreement, § 2.1.) Further, the Development Agreement states Tracy Hills has the “vested right to develop the property in accordance with the Existing Rules, Project Approvals and any Subsequent Approvals.” (§ 3.1(a).) The “Existing Rules,” in turn, are defined as the “City’s General Plan, the Specific Plan, the City’s Municipal Code, all Citywide Infrastructure Master Plans, and all other adopted City ordinances, resolutions, rules, regulations, guidelines and policies *in effect on the Effective Date.*” (§ 1.29.)

In short, under the terms of the Development Agreement, the City cannot require Tracy Hills to comply with any new zoning regulations that conflict with the “Existing Rules” for the life of the Development Agreement – i.e. until May 19, 2041. This means that even if the City were to ultimately rezone the Tracy Hills properties, such a rezoning would be ineffective as against

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Tracy Hills, which would retain the vested right to develop those sites at lower densities per the “Existing Rules.”

Despite the existence of this Development Agreement, and the existence of Tracy Hills vested rights to develop those properties, the Draft Housing Element has identified five separate parcels in its site inventory list (see Table B), as opportunity sites, that will supposedly accommodate a total of 520 of low income units. (See Draft Housing Element, p. D-7.) In particular the five parcels are subject to the Tracy Hills Specific Plan, and are zoned as follows:

- APN 25105009 – 10-acre portion of larger parcel currently zoned Medium Density Residential – Tracy Hills
- APN 25106016 – 9.7 acre parcel currently zoned High Density Residential – Tracy Hills
- APN 25337001 – 2.1-acre parcel currently zoned High Density Residential – Tracy Hills
- APN 25338052 – 7.7-acre parcel currently zoned Mixed Use Business Park-Tracy Hills
- APN 25338053 – 3.3-acre parcel currently zoned Mixed Use Business Park-Tracy Hills

Each of these five parcels are covered by the Development Agreement. Accordingly, they should be removed from the Draft Housing Element’s site inventory list because they will not be required to comply with the City’s proposed zoning regulations until after May 2041, i.e. outside of the relevant planning period.

Additionally, the Draft Housing Element’s description of APN 25106016 is incorrect, because that parcel is much larger, and is subject to different zoning designations than what is reflected in the Draft Housing Element. At a minimum, the Draft Housing Element should be revised to refer to the right acreage and proper zoning designation.

2. Tracy Hills Remains Willing to Offer the Entirety of APN 25105009 to the City to be Developed As Affordable Housing

Tracy Hills previously reached out to City staff as they were drafting the Draft Housing Element, and offered to provide the entire 26.9-acre site located at 28281 North Lammers Road

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(APN 25105009) (the “Triangle Property”)² as an opportunity site to help the City meet its RHNA allocation, in exchange for avoiding having to designate other parcels within the Tracy Hills Project area and to meet any future affordable housing requirements Integral Communities owned or controlled lands. However, at that time, City staff informed us that they were instructed to not entertain that proposal at that time.³

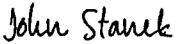
That being said, Tracy Hills believes that this arrangement can benefit the City, Tracy Hills and the public in general. If Tracy Hills were to transfer ownership of the Triangle Property to the City, it would have complete control over how the property was ultimately developed, and can even look for affordable housing developers to help accomplish this goal.

Additionally, agreeing to this transfer will allow the City to designate the entire Triangle Property as HDR, giving it the potential to accommodate 538 lower-income units, which would offset the units that will be lost when the remaining Tracy Hills properties are removed from the site inventory list.

Accordingly, Tracy Hills respectfully requests that the City Council direct staff to further confer with Tracy Hills, so that we may continue to work through this potential strategy.

3. Concluding Remarks

Tracy Hills is willing to continue to discuss these important issues with the City as partners as this process moves forward. However, due to the timing restrictions, we felt it was important to raise these issues now. Please feel free to contact me with any questions or clarifications you may have.



John Stanek

² Due to the site’s triangular appearance, City staff and Tracy Hills have colloquially referred to this property as the Triangle Property. (See, e.g., Draft Housing Element, p. IV-16.)

³ It is unclear if this offer was ever relayed from City Staff to the City Council.

Letter from BIA

Significant Legal Deficiencies Remain in the City of Tracy's July 2024 Revised Draft Housing Element

1. Inadequate revisions regarding reliance on pipeline projects to meet entire above-moderate RHNA.

HCD's Feb. 20, 2024 Review Letter required the Revised Element to provide important additional information about the status of pipeline projects, constraints to their final approval and construction, and to identify specific program and policy commitments to expedite construction and occupancy:

The element identified 3.149 units...that are either pending approvals, approved, or under construction. While the element included the project status for each project, it should also demonstrate the likelihood that these units will be available during the planning period. To demonstrate availability, the element could analyze infrastructure schedules, City's past completion rates on pipeline projects, outreach with project developers, describe expiration dates on entitlements, anticipated timelines for final approvals, phasing requirements, and any remaining steps for projects to receive final entitlements....

[G]iven the element's reliance on pipeline projects, the element should add or modify programs to facilitate development (e.g. coordinate with applicants to approve remaining entitlements, expediting approvals) and monitor progress toward completion in the planning period....

Finally, the element should address public comments on this revised draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.... Programs must have specific commitment...and discrete timing.

The Revised Element fails to satisfy these requirements in the following respects:

- With respect to HCD's finding requiring additional information on pipeline projects, the Revised Element adds only vague, limited, and incomplete information to Table IV-12.

- To satisfy HCD's finding, Table IV-12 should be revised to include a thorough and uniform step-by-step matrix of the city's review and approval process that includes the following:
 - Identify every permit, approval, review, and inspection process/requirement that remains for each project through issuance of COO.
 - Define and describe with specificity each permit, approval, review and inspection process/requirement in clear and consistent manner.
 - Identify the department/ departments and individuals responsible for reviewing each remaining application/approval/inspection and for making the decisions on them.
 - Identify the specific stage that each project is in as of the date of the next Revised Element
 - Specify the specific date (month and year) by which each remaining permit, approval, review, and inspection up to COO is expected to be completed and whether each permit, approval, review and inspection is subject to the information, application review, decision timelines and other provisions of the Permit Streamlining Act and/or AB 2234.
- With respect to HCDs' finding that requires the Revised Element to identify and remove policies and practices that constrain completion of pipeline projects, the Revised Draft asserts that: *"The City has reviewed the pending projects and there are no known barriers to development, phasing, or other relevant factors that would prohibit the pending projects from being completed."*
- This conclusory statement is contradicted by detailed comments submitted by the development community, as well as the findings of the Civil Grand Jury. The city's consistent response to extensive and detailed comments submitted by BIAGV and other developers who have brought these issues directly to the attention of the city at public hearings in connection with projects has been to blame the developer. According to the Revised Draft's response to comments, the City of Tracy has no policies or practices with respect to development processing that constrain housing, and that every problem identified by the development community (and the Grand Jury) is the fault of developers. The Revised Draft fails to acknowledge that state law imposes important limits on local practices regarding deeming applications incomplete, demanding additional information from applicants, and timelines to review applications both for completeness and making final decisions. Both the development community and the Grand Jury have identified these as significant problems and the Revised Element neither acknowledges them nor commits to address them.
- To satisfy HCD's finding, the Revised Draft should be required to include the following additional Program and Policy.

Program: Facilitate and Expedite Completion of Pipeline Projects

Policy. The city shall immediately meet with the developers of Pipeline Projects to develop a Completion Schedule that identifies each remaining permit, approval, review and inspection that will be required up to COO. The Completion Schedule shall identify whether the permit, approval, review, or inspection is discretionary or ministerial and the state law (e.g. Permit Streamlining Act, AB 2234) governing the process and timelines for each. The Completion Schedule shall also identify the department(s) and staff that will be responsible for compliance with these process and timeline provisions.

2. Inadequate revisions addressing governmental constraints.

HCD's Feb. 20, 2024 Review Letter required the Revised Element to comply with housing element law provisions addressing governmental constraints: *"As noted in Findings B4, the element requires a complete analysis of potential governmental...constraints. Depending on the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints."*

The Revised Element fails to satisfy these requirements in the following respects:

- With one minor exception, the Revised Element's governmental constraints analysis does not identify any specific policies regarding the timing and processing of development permits that are constraints. This is consistent with the Revised Draft's assertion that developers are responsible for every instance of delay and difficulty. Since the Revised Draft does not acknowledge that it has any policies or practices that constrain development, the Revised Draft contains no revised or additional programs that address and remove or mitigate any identified constraints (other than the minimal GMO exception for affordable housing units). Instead, the constraints policy simply calls for the city to "review and adjust as appropriate" any policy that the city determines at some future date is a constraint. Notably, even this bare policy represents a weakening of housing element requirements. Housing element law requires the city to "address, and where legally possible remove governmental constraints." The Revised Element's Policy R.1 commits only to "review and adjust" constraints:

D. Remove Governmental Constraints

Pursuant to State law, the City is obligated to address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. Removing constraints on housing development can help address housing needs in the City by expediting construction, and lowering development costs.

V. Housing Plan

Goal 4.0

Mitigate any potential governmental constraints to housing production and affordability.

Policy 4.1

Review and adjust as appropriate residential development standards, regulations, ordinances, and processing procedures that are determined to constrain housing development, particularly housing for lower and moderate income households and for persons with special needs.

Allow more than 150 affordable housing units as exceptions under the GMO.

- To satisfy HCD's finding, the Revised Draft should be required to include the following additional Program and Policies:

Program: Ongoing Housing Constraints Review and Mitigation/Removal.

Policy. The city shall complete a systematic review each year during the planning period, with the active participation of the development community, of residential development standards, regulations, ordinances, and processing procedures and practices to identify potential constraints to the maintenance, improvement, and development of housing for all income levels. Following the review, in a timely manner revise, and where legally possible remove, any standard, ordinance, procedure or practice that could be reasonably determined to constraining the review, approval, and construction of housing.

Policy. Prior to proposing any new or more stringent standard, regulation, procedure or practice that potentially constrains new housing (including, but not limited to, adoption of the inclusionary housing policy identified in Program 13), the city shall subject the proposal to a constraints analysis and if the proposal would potentially act as a constraint, either not pursue the proposal, or modify it to minimize the constraint to the maximum extent feasible while achieving the underlying policy goal. For example, future inclusionary zoning ordinance.

Program: Local Permits and Processing Times

Policy. The city shall address the findings of the 2023-2024 Civil Grand Jury Report that pertain to residential development, e.g. Findings F 2.1 through 2.5, and implement Recommendations R2.1 through R2.5.

Policy: The city shall ensure that all departments and staff are aware of the requirements of state law regarding entitlement and post-entitlement review, including the Permit Streamlining Act and Government Code Section 65913.3, and the city shall comply with the statutory requirements.

3. Inadequate program relating to preempted Density Bonus Ordinance.

While the Revised Draft identifies the need to revise the city's Density Bonus Ordinance as part of Program 14, the discussion and commitment to action are inadequate. The city's current

ordinance conflicts with state law in numerous significant ways. These conflicts should be expressly acknowledged in the Revised Draft and Program 14 should be revised to include a Policy commitment to ensure that all development applicants are apprised of the specific provisions of the city's ordinance that are unenforceable. These include the requirement that applicants submit a project pro forma as part of a density bonus application; the requirement that applicants pay a fee to the city to peer review the pro forma; improperly placing the burden of proving that concessions/incentives/waivers should be granted on the applicant; imposing improper conditions on the issuance of concessions/incentives/waivers (such as a requirement that they be necessary to make projects economically feasible); improperly segmenting concessions (such as treating each story of height-reduction as requiring a separate concession); and improperly limiting the scope and breadth of concessions.

Maintaining the existing ordinance online without prominent notice to applicants that it is in critical aspects invalid and unenforceable creates a substantial risk that applicants will believe they have to comply with unlawful requirements.

Program 14 should also be revised to include a commitment to update the local ordinance by a date certain; a commitment to follow state law as interpreted by recent case law and HCD TAs; and a commitment to include on the city's development web page a prominent notice that the current ordinance is unenforceable in key respects along with an identification of the specific conflicts with state law and a link to Government Code Section 65915.

4. Inadequate revisions to the Large Sites Program.

HCD's Feb. 20, 2024 Review Letter required the Revised Element to revise Program 10 (Development of Large Sites) to include additional program and policy commitments to justify relying on these sites for meeting a significant part of the city's affordable housing adequate sites obligation.

The Revised Draft does not identify any specific incentives or strategies to ensure that the market rate units necessary to enable development of the sub-areas with affordable units will be approved and be economically feasible and therefore fails to satisfy HCD's requirements. Program 10 should be amended to include the following specific commitments:

- By a date certain, the city shall send standardized notices to each owner of a Large Site that includes a copy of the Revised Draft's narrative/expected development for the entire site and the sub-area that is projected to be developed with affordable units.
- The city shall request that the owner submit recommendations, modifications, proposed incentives and an overall plan for developing and approving a master plan or specific plan for the economically feasible development of site.
- The city shall meet with the owner to discuss the owner's recommendations and make a good faith effort to agree on plan for developing and approving a master plan or specific plan that ensures approval of the plan and completion of construction during the planning period.

Conclusion

The City of Tracy's Revised Draft Housing Element does not adequately address the significant deficiencies identified by HCD in its review letter or by members of the development community and the Civil Grand Jury and therefore does not substantially comply with Housing Element law. Unless and until the City of Tracy adopts a significantly revised draft that does address these deficiencies, HCD should continue to find the City out of housing element compliance and subject to the Builder's Remedy and other consequences of being out of compliance. This will be especially important in the near future as legislation effecting important strengthening of Builder's Remedy Law and the elimination of "self-certification" are on the verge of being enacted and signed into law to become effective Jan. 1, 2025.

City of Tracy's Response

The City of Tracy is responsible for providing a wide range of housing options and opportunities to our community and citizens. The State of California requires the City to identify housing that will be provided in various densities and income levels. This includes providing sites to meet all of our RHNA obligations.

The State has an interest in making sure our sites inventory includes sites to be spaced throughout the community and that these sites include a range of densities and income ranges. The City is obligated to ensure that a wide range of housing opportunities occurs in all the various locations in Tracy. The City has accomplished that with our siting of the properties necessary to meet our housing obligation.

The City is required to identify policies or programs that provide constraints to the construction of housing. Staff has reviewed the current pipeline as well as internal policies and programs for our review and approval of development projects. The City is obligated to comply with Federal, State and local laws and requirements for how we review, process and approve applications and projects. Our review looks to streamline and eliminate any process constraints where staff can. The City does work with the development community to move projects forward, but in certain instances, outside forces (interest rates, the housing market, material supply, labor constraints) create market conditions that the City has absolutely no control over. The BIA letter requests staff to identify completion schedules for projects that exceed our scope and jurisdictional boundary.

In many cases outside forces will affect timing and delivery of projects. The completion of improvement plans, physical construction and ultimate project sales and delivery requires a partnership that in many instances the City does not control, nor are we informed or contacted about.

The 2023-2031 Housing Element includes numerous development code updates, new provisions and new programs to meet current and future state requirements and laws. The Housing Element is a living and breathing document that requires constant review and implementation of. The BIA letter identifies numerous programs that are required by the state. These are identified as program priorities. These are required to be completed and implemented.

The BIA letter identifies some project delays because of timing of improvement plans and final maps. The development community is obligated to comply with environmental measures, conditions of approval and any obligations for community facility districts or development agreements. In most, if not all instances, the review of improvement plans and final maps is not delayed by staff, but by the timing of submittals and the ability of developers to satisfy various federal, state and local conditions. Market conditions and financing determines the speed and timing of projects. Staff continues to review its role in the process and ensure that projects move forward in a timely manner, while staff verifies that requirements are met. Typically, the development community drive the post approval process and the delivery timing.

The City considers the BIA a partner in the development process and meaningful dialog to ensure a timely process takes place has occurred. The City has a long history of growth and project approval and ultimate development. The City will work to ensure this collaborative relationship continues.

Appendix B Review of Past Accomplishments

This chapter contains an analysis of the effectiveness of the 2015-2023 Housing Element, appropriateness of goals and the progress in implementing programs for the previous planning period as required by California Government Code Section 65588(a). The chapter also includes an evaluation of the appropriateness of continuing the 2015-2023 Housing Element goals and programs. Findings from this analysis and evaluation have guided development of the Housing Action Plan described in Section 6: Housing Plan.

1. Program Evaluation

The 2015-2023 Housing Element contained five primary goals and 12 implementing programs consistent with California housing element law and priorities expressed by the Tracy community, including input received from the City Council, Planning Commission, and City staff.

The five primary housing goals were:

- Goal 1: Conserve and improve the condition of the existing housing stock, especially affordable housing.
- Goal 2: Assist in the provision of housing that meets the needs of all economic segments of the community.
- Goal 3: Provide suitable sites for housing development which can accommodate a range of housing by type, size, location, price, and tenure.
- Goal 4: Mitigate any potential governmental constraints to housing production and affordability.
- Goal 5: Continue to promote equal housing opportunity in the City's housing market consistent with Federal and State fair housing laws.

Table B-1Table B-1 summarizes the programs contained in the previous Housing Element along program objectives, accomplishments, and the appropriateness of continuing with the previous programs and policies for this Housing Element Update. Table B-2Table B-2 shows the quantified objectives and accomplishments during the 5th Cycle.

2. Effectiveness in Addressing Special Needs

The City was able to provide the following assistance to special needs households during the 2015-2023 Housing Element planning period:

- In 2019, the City allocated \$112,000 in Home Investment Partnership Program funds to the San Joaquin County Housing Authority and Stone Pine Meadows, a 72-unit apartment complex for lower-income households.
- In FY 2021, the City allocated \$163,461 in Home Investment Partnership Program funds to the San Joaquin County Housing Authority to support the demolition and reconstruction of a 60-unit low-income apartment project.
- In 2020, City Council allocated \$4 million to the Housing Authority of San Joaquin County for the rehabilitation of existing low-income housing units.
- The City facilitated the rehabilitation of the McHenry House - Family Homeless Shelter and Emerson House (transitional housing facility for men) through the CDBG program.

- The City continues to participate in the Housing Choice Voucher Program operated by the San Joaquin Housing Authority funded by HUD. About 162 Tracy households are currently receiving housing choice voucher assistance.

Cumulative Impact of Special Needs Programs

As shown in Table B-1, several programs included action items for special needs housing. Some programs focused on policies and regulations while others had numerical metrics. Overall, the 5th cycle Housing Element has not included a robust list of programs/objectives that target on special needs populations. Below is a list of these policies/programs and whether or not objectives were met during the 5th cycle:

- Program 1: Downtown Rehabilitation Home Loan Program had a goal of assisting 20 lower and moderate-income households. During the planning period, 27 moderate-income units were rehabilitated. Some of the households assisted were special needs households, such as seniors.

In addition, the City contributed funding for the rehabilitation of Stone Pine Meadow, which includes 34 larger units (six with four bedrooms) that are suitable for large households, and 15 small units (one bedroom) that can accommodate senior households. CDBG funds were also used to rehabilitate McHenry House - Family Homeless Shelter and Emerson House (transitional housing facility for men) serving homeless needs in Tracy and surrounding areas.

The City also allocated HOME funds to the demolition and reconstruction of Tracy Senior Living. Phase 1 involves the demolition of 17 obsolete units and Phase 2 is the reconstruction of 55 energy-efficient units for seniors with very low incomes. The project is expected to be completed in 2026.

- Program 15: The Zoning Code Amendment Program included modifying the Density Bonus, Residential Care Facilities, Farmworker Housing and Employee Housing. These were not completed during the housing cycle. These amendments are being included in the 6th cycle Housing Element to be completed by the end of 2024.
- Program 16: Fair Housing Program aims at providing services to residents, including those with special needs. The City participates in providing an annual direct allocation to the San Joaquin Fair Housing Association (SJFH) through the CDBG program. Between 2016 and 2021, \$35,379 was allocated. Information on the Fair Housing services are available at City Hall and on the City's website under the Economic Development Division homepage. SJFH provides fair housing education, mediation, housing assistance, complaint investigation, and resolution for residents and property owners. Overall, SJFH serves about 7,000 individuals/households annually throughout the region.
- Several programs were rolled into the City's Action Plan for Affordable/Workforce Housing. This process began in 2021. These include Program 7, Affordable Housing Development, Program 10, Affordability By Design, And Program 15, Zoning Ordinance Amendments.

While some goals for special needs housing was met during the 5th cycle, others fell short. Much of this was due to staffing, budget, and the high costs of housing development in Tracy.

For the 2023-2031 Housing Element planning period, the City will increase its efforts in facilitating affordable housing opportunities for lower and moderate income households, including housing for special needs. Specifically, rezoning for multi-family and mixed use residential development,

incentives for ADUs and affordable housing development, and pursuit of inclusionary housing, would expand opportunities for special needs households.

Table B-1: Program Summary (2015-2023)

Program Description	Objectives and Timeframe	Accomplishments	Appropriateness
Goal 1.0: Conserve and improve the condition of the existing housing stock, especially affordable housing.			
1 Downtown Rehabilitation Home Loan Program	<ul style="list-style-type: none"> Annually consult the HCD and HUD websites to identify and pursue potential funding opportunities that may be available and appropriate to reinstate a housing rehabilitation program. Refer property owners in need of rehabilitation assistance to the San Joaquin County Neighborhood Preservation Division who administers the County's HUD Grant programs, which include housing rehabilitation programs (currently suspended). Assist 20 lower- and moderate-income households with the rehabilitation of their homes during the planning period. 	<p>The County's HUD Grant was reinstated in March 2022 to provide housing rehabilitation assistance through the Home Improvement Partnership Grant Program (HOME).</p> <p>In 2017 the City began the process of drafting a boarded buildings ordinance in an effort to lead to rehabilitation of homes.</p> <p>In 2019, the City allocated \$112,000 in Home Investment Partnership Program funds to the San Joaquin County Housing Authority and Stone Pine Meadows, a 72-unit apartment complex for lower-income households.</p> <p>In FY 2019-2020, the County did not complete any housing rehabilitations, however rehabilitation of the McHenry House - Family Homeless Shelter and Emerson House (transitional housing facility for men) were made through the CDBG program.</p> <p>In FY 2020-2021, the County funded \$50,089 for four housing rehabilitation projects.</p> <p>In FY 2021, the City allocated \$163,461 in Home Investment Partnership Program funds to the San Joaquin County Housing Authority to support the demolition and reconstruction of a 60 <ins>unit</ins> low-income apartment project.</p>	<p>The City will work to identify and pursue additional funding sources to reinstate this program, if feasible. A modified version of this program will be included in the 2023-2031 Housing Element.</p>

Program Description		Objectives and Timeframe	Accomplishments	Appropriateness
2	Code Enforcement	<ul style="list-style-type: none"> Continue to investigate possible code violations. Continue to disseminate information on housing rehabilitation assistance available to address code violations and other housing issues. 	The City's Code Enforcement Division continues to administer a fair and unbiased code enforcement program to correct violations of property conditions and land use requirements. The City continues to provide information about its Code Enforcement Division on its website, including directions for residents on how to both resolve and report potential violations.	This program continues to be appropriate and will be included in the 2023-2031 Housing Element.
3	Graffiti Removal Program	<ul style="list-style-type: none"> Continue to operate the Graffiti Hot Line. 	<p>The City's Department of Operations and Utilities continues to operate a Graffiti Removal Program and Graffiti Hot Line. The City continues to provide information about this program on its website, including direction for residents on how to anonymously report vandalism and steps to prevent its occurrence.</p> <p>Graffiti complaints and concerns can be reported by phoning the Code Enforcement Division at (209) 831-6410.</p>	This program continues to be appropriate and will be included in the 2023-2031 Housing Element.
4	Affordable Housing Monitoring	<ul style="list-style-type: none"> Monitor status of affordable units annually by maintaining contact with property owners and HUD Multi-Family Housing division. Solicit interest and participation of nonprofit housing developers to acquire and preserve housing to be maintained as affordable units. 	<p>No affordable housing developments in the City were considered at-risk of losing their affordability status during the 2015-2023 Housing Element planning period.</p> <p>In 2020, City Council allocated \$4 million to the Housing Authority of San Joaquin County for the rehabilitation of existing low-income housing units.</p>	This program continues to be appropriate and will be included in the 2023-2031 Housing Element.

Goal 2.0: Assist in the provision of housing that meets the needs of all economic segments of the community.

5	Downpayment Assistance Program	<ul style="list-style-type: none"> Continue to provide down payment assistance to qualified lower income households (up to 80 percent AMI). Disseminate information to prospective first-time homebuyers on the DAP Loan Program. 	<p>This program is still available, but due to high home prices in Tracy, qualifying for a home purchase and meeting low-income requirements is challenging. As a result, the City has not processed a</p>	<p>The City will work to identify and pursue additional funding sources to reinstate this program, if feasible. A modified version of this program will be included in</p>
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Program Description		Objectives and Timeframe	Accomplishments	Appropriateness
		<ul style="list-style-type: none"> Assist three households (an estimated one very low income and two low income households) annually. 	Downpayment Assistant Loan since 2011.	the 2023-2031 Housing Element.
6	Homebuyer and Financial Literacy Training	<ul style="list-style-type: none"> Continue to require a “Certificate of Completion” from a HUD-approved homebuyer class in order to participate in the City’s DAP Loan Program. Partner with qualified local non-profit agencies to offer homebuyer education classes and publicize the availability of these classes to residents. 	This program is overseen by the San Joaquin County Neighborhood Preservation Division, Visionary Home Builders, Neighbor Works, and NID-HCA (Housing Counsel Agency), and is dependent on funding from HUD.	This program continues to be appropriate and will be included in the 2023-2031 Housing Element
7	Affordable Housing Development	<ul style="list-style-type: none"> Continue to prioritize the allocation of residential growth allotments (RGAs) to affordable housing projects (particularly for those projects that set aside units for extremely low income households and persons with special needs, including those with developmental disabilities, and farmworkers). Proactively encourage and facilitate, on an ongoing basis, the development of affordable housing by non-profit organizations for lower income households, particularly those with special needs including large households, seniors, extremely low-income (ELI) households, and households with persons who have disabilities or developmental disabilities, and farmworkers. Continue to provide density bonuses and other incentives on an ongoing basis to developers who provide affordable units, such as technical assistance related to City policies and regulations, and pre-application consultation with staff. 	<p>The Growth Management Ordinance establishes exceptions to annual residential permit limits for affordable housing projects, and the Density Bonus Ordinance establishes the incentives for affordable housing projects.</p> <p>On March 2, 2021, the City Council approved a scope of work with PlaceWorks, Inc. to work with the City on an action plan to address affordable/workforce housing. One consideration in the plan would allow more RGAs to be allocated to affordable housing projects but requires a change to Measure A with voter approval to implement: Provide additional market-rate Residential Growth Allotments (RGAs) for projects that include a specified percentage of affordable units. Other action items are related to increased density allowances, permit higher density houses by right in certain commercial zones, update City Regulations regarding Accessory Dwelling Units, rezone two sites from industrial to residential, create off-the-shelf Accessory Dwelling Unit plans, and other direct developer support efforts for</p>	

Program Description		Objectives and Timeframe	Accomplishments	Appropriateness
			affordable housing projects. The City secured grant funding in 2020 to begin work on these efforts.	
8	Housing Choice Voucher Program (Section 8)	<ul style="list-style-type: none"> • Disseminate information to the public regarding the HCV program and promote participation by rental property owners. • Annually contact the HACSJ to obtain information on the status of the HCV program and other available resources. • Continue to support HACSJ's petition for increased funding from HUD. • Continue to work with HACSJ to provide HCVs to Tracy residents. • Continue to work with the HACSJ to assist households through the Family Self-Sufficiency Program. 	The City continues to participate in the Housing Choice Voucher Program operated by the San Joaquin Housing Authority funded by HUD . About 15 162 Tracy households are currently receiving housing choice voucher assistance.	This program is completed, and a modified version will be included in the 2023-2031 Housing Element.
9	Sustainability Program	<ul style="list-style-type: none"> • Continue to develop the Sustainability Action Plan. 	The City adopted the Sustainability Action Plan in February 2011. This document is frequently used in development project review and CEQA review. The entire Plan is available on the City's website.	This program is completed and a modified version will be included in the 2023-2031 Housing Element.
10	Affordability by Design	<ul style="list-style-type: none"> • Continue to implement the recently adopted Zoning Amendments that incorporate affordability by design concepts described in the General Plan. • Encourage the development of a variety of housing types that provide affordable housing options for persons with special needs, such as micro-units, senior units, second units, and small-lot developments. • Promote Affordability by Design principles by placing information on City website and at public counters by 2016. 	<p>Revised development regulations influenced by Affordability by Design principles were incorporated into the Zoning Ordinance over the last number of years. For example:</p> <ul style="list-style-type: none"> • Any use, including multi-family residential, may request up to a 20% reduction in required parking based on a study or survey that illustrates that required number of parking spaces pursuant the City's Off-Street Parking Ordinance is not needed for the use (Ordinance 1181). • Relaxed setbacks in the High Density Residential Zoning District (Ordinance 1179), permitted a broader 	This program continues to be appropriate, and a modified version will be included in the 2023-2031 Housing Element.

Program Description	Objectives and Timeframe	Accomplishments	Appropriateness
		<p>degree of housing types in the Central Business District Zone consistent with General Plan densities (Ordinance 1282),</p> <p>Implementing the State's allowances for ADUs (Government Code Section 65852.150) which were updated effective January 1, 2020. This has provided for greater flexibility for the allowance and maximum usage of residential sites.</p> <p>On March 2, 2021, the City Council identified an action plan to address affordable/workforce housing, among which include changes to density and development regulations. Work began on developing these action items in 2021.</p>	

Goal 3.0: Provide suitable sites for housing development which can accommodate a range of housing by type, size, location, price, and tenure.

11 Provision of Adequate Sites	<ul style="list-style-type: none"> • Complete rezoning of the four parcels on Valpico Road within two years of the adoption of the 2015-2023 Housing Element. • Monitor and update the sites inventory annually to assess its adequacy for meeting the RHNA, particularly for sites capable of facilitating the development of lower income housing. • Make the inventory of vacant sites available to interested developers after adoption of the Housing Element. • Should properties identified in the residential sites inventory become unavailable during the planning period, resulting in a shortfall in sites for meeting the RHNA, the City will identify additional sites per Government Code § 65863. 	<p>The parcels on Valpico Road have not yet been rezoned. The City has had numerous meetings with developers about the appropriate zoning of this site, and these conversations are still going. The City anticipates a formal development (rezoning to High Density Residential and Tentative Map) application for residential use of the property by November 2023. While the residential use will be consistent with the High Density Residential density, the project is not anticipated to be deed-restricted for below-market rate housing. Therefore, this item will be removed from the list of Objectives.</p> <p>The available sites inventory is still accurate and is publicly available on the City's website on page 81 of the Housing Element. Tracy's RHNA obligations are</p>	<p>This program continues to be appropriate and will be included in the 2023-2031 Housing Element.</p>
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Program Description		Objectives and Timeframe	Accomplishments	Appropriateness
				being assessed annually. There is currently no shortage on vacant sites.
12	Property Acquisition and Improvement	<ul style="list-style-type: none"> Continue to identify and seek partnerships with organizations and the County in order to acquire, improve, and develop affordable housing Continue to assist in site acquisition for affordable housing. As funding permits, prioritize funding assistance to affordable housing projects that set aside units for seniors, persons with disabilities, and extremely low income households. 	<p>The dissolution of the Tracy Community Development Agency in 2012 eliminated the Redevelopment Project area and severely compromised the City's ability to pursue and purchase properties for residential development. However, the City will continue to identify and seek partnerships with organizations to acquire, improve, and develop affordable housing.</p>	This program continues to be appropriate, and a modified version will be included in the 2023-2031 Housing Element.
13	Inclusionary Housing	<ul style="list-style-type: none"> Explore the potential and set the stage for a voluntary inclusionary housing program that includes an extremely low income housing component by 2017. Monitor the City's affordability conditions on an annual basis and identify an inclusionary housing trigger, if necessary. 	<p>Projects that voluntarily provide inclusionary housing are granted priority for Residential Growth Allotments that are necessary to obtain a building permit for residential development as established in the Growth Management Ordinance Guidelines (Resolution 2014-145).</p> <p>The City Council conducted a workshop in June 2021 and directed City staff to add inclusionary housing to the workforce/affordable housing action plan list. The City is working through each item in the action plan toward implementation.</p>	This program continues to be appropriate, and a modified version will be included in the 2023-2031 Housing Element.
14	Resale of Foreclosed Properties	<ul style="list-style-type: none"> Continue to collaborate with the County, on an ongoing basis, to identify and pursue available resources for the acquisition/rehabilitation of foreclosed and/or substandard housing as affordable housing. 	<p>The City focused its efforts on the maintenance of foreclosed properties to prevent vandalism. The City's Code Enforcement Division received calls and resolved issues related to graffiti and weed abatement on foreclosed properties. This is on-going in collaboration with the San Joaquin County Neighborhood Preservation Division.</p>	The NSP funding for this program has been exhausted but the City will work to identify additional funding sources to continue this program. A modified version will be included in the 2023-2031 Housing Element.

Program Description	Objectives and Timeframe	Accomplishments	Appropriateness
Goal 4.0: Mitigate any potential governmental constraints to housing production and affordability.			
15 Zoning Ordinance	<ul style="list-style-type: none"> • Complete Zoning Ordinance amendments to address the provision of density bonuses, residential care facilities, farmworker housing, and employee housing by the end of 2016. Specifically: <ul style="list-style-type: none"> • Density Bonus: Update Density Bonus Ordinance to reflect the requirements of AB 2222 (effective January 2015), including extending the affordability control for the affordable units to 55 years, and requiring the replacement of existing affordable units demolished or removed in order to qualify for a density bonus, incentive, or concession. • Residential Care Facilities: to In accordance with the Lanterman Act, amend the Zoning Ordinance to permit residential care facilities serving six or fewer persons as a single-family residential use. In addition, consistent with City practice, amend the Zoning Ordinance to allow residential care facilities of seven or more persons in all residential zones with a Conditional Use Permit. • Employee Housing: The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The City will amend the Zoning Ordinance to address the provision of farmworker housing consistent with the Employee Housing Act. 	<p>Zoning code amendments related to Density Bonus, Residential care facilities, Farmworker housing, and employee housing were not completed during the planning period. However, on February 4, 2020, the City Council identified an action plan to address affordable/workforce housing, among which include changes to density and development regulations. Work began on developing these action items in 2020. The City is working through each item in the action plan toward implementation.</p>	<p>This program continues and a modified version will be included in the 2023-2031 Housing Element.</p>

Program Description	Objectives and Timeframe	Accomplishments	Appropriateness
	<ul style="list-style-type: none"> • Reevaluate recent amendments to the definition of “family” and “supportive housing” in the Zoning Ordinance and amend, as necessary, to comply with State laws. • Evaluate Zoning Ordinance for any potential constraints to the development of housing on an ongoing basis. 		
16 Growth Management Ordinance (GMO)	<ul style="list-style-type: none"> • Annually monitor and evaluate the Growth Management Ordinance for the impacts on the cost, supply and timing of housing including seeking input from residential developers and affordable housing stakeholders in reviewing the effects of the GMO. The review will reflect the RHNA as a minimum and consider impacts on overall housing supply in addition to accommodating the RHNA. Information will be included and evaluated as part of the annual Growth Management Status report, published in the fourth quarter of each calendar year. 	<p>The Growth Management Ordinance was amended in November 2015 to permit building permits to be issued beyond the maximum number of Residential Growth Allotments issued in accordance with the Ordinance in an effort to allow housing to be built in accordance with the City's assigned RHNA (Ordinance 1201). The growth management status and pipeline report are on the City's website.</p>	<p>This program continues to be appropriate and will be included in the 2023-2031 Housing Element.</p>

Goal 5.0: Continue to promote equal housing opportunity in the City's housing market consistent with Federal and State fair housing laws.

17 Fair Housing	<ul style="list-style-type: none"> • Continue to support the San Joaquin Fair Housing Association, or other qualified fair housing agencies, annually with CDBG funds and refer residents seeking fair housing assistance on an ongoing basis. • Advertise the services provided by the San Joaquin Fair Housing Association (or other qualified fair housing agencies) on an ongoing basis in City buildings and other public buildings (such as public libraries, community centers, County Housing Authority offices, and post offices, etc.). 	<p>The City participates in providing an annual direct allocation to the San Joaquin Fair Housing Association through the CDBG program. Between 2016 and 2021, \$35,379 was allocated. Information on the Fair Housing services are available at City Hall and on the City's website under the Economic Development Division homepage.</p>	<p>This program continues to be appropriate and will be included in the 2023-2031 Housing Element.</p>
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Table B-2 : Housing Element Quantified Objectives and Accomplishments

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction (RHNA) (Objectives)	453	454	632	813	2,535	4,888
New Construction (Actual - Permitted)	0	0	0	840	727784	859784
Rehabilitation (Objectives)						
Downtown Rehabilitation Loan	1	1	2	1	0	5
Downtown Rehabilitation Grant	5	5	10	5	0	25
NSP	0	2	2	5	0	9
Rehabilitation (Actual)						
Downtown Rehabilitation Loan	0	0	0	2	0	2
Downtown Rehabilitation Grant	0	0	0	11	0	11
NSP	0	0	0	14	0	14
Preservation (Objectives)	No units at risk during planning period					
Assistance (Objectives)						
Downpayment Assistance	0	20	25	25	0	60
Section 8	83	83	0	0	0	166
Family Self-Sufficiency	8	9	0	0	0	17
Assistance (Actual)						
Downpayment Assistance	0	4	12	7	0	23
County GAP-DPA Program	0	0	0	8	0	8
Section 8	75	75	0	0	0	150
Family Self-Sufficiency	Information Not Available					

APPENDIX C

Affirmative Furthering Fair Housing (AFFH)

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Appendix C Affirmatively Furthering Fair Housing

A. Introduction, Outreach, and Assessment

1. Introduction

Fair housing prohibits housing discrimination based upon race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, or genetic information.

Assembly Bill (AB) 686 requires a jurisdiction's Housing Element to provide an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions and how the identified Regional Housing Needs Allocation (RHNA) sites affirmatively further fair housing. AB 686 requires jurisdictions to identify meaningful goals to address the impacts of systemic issues such as residential segregation, housing cost burden, and unequal educational or employment opportunities to the extent these issues create and/or perpetuate discrimination against protected segments of the population. In addition, AB 686:

- Requires jurisdictions and public housing authorities to administer their programs and activities related to housing and community development in a way that affirmatively furthers fair housing;
- Prohibits the state, cities, counties, and public housing authorities from taking actions materially inconsistent with their Affirmatively Furthering Fair Housing (AFFH) obligation;
- Adds an AFFH analysis to the Housing Element (an existing planning process that California cities and counties must complete) for plans that are due beginning in 2021; and
- Includes in the Housing Element's AFFH analysis a required examination of issues such as segregation and resident displacement, as well as the required identification of fair housing goals.

The bill added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity;
- An analysis of segregation patterns and disparities in access to opportunities,
- An assessment of contributing factors, and
- An identification of fair housing goals and actions.

2. Public Outreach

The City of Tracy solicited community input throughout the Housing Element update planning process in a variety of ways. The main strategies to gather public participation are summarized below.

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Outreach Activities

Community members were engaged using the following methods:

- Survey available in hard copy and online in both English and Spanish
- Stakeholder focus group interviews
- Dedicated project website (<https://tracyheu2023.weebly.com/>)
- Community workshops
- Joint City Council and Planning Commission study session
- Public hearings

Organizations Contacted and Consulted

Organizations contacted and interviewed included:

- McHenry House Tracy Family Shelter
- Souza Realty and Development
- City of Tracy Homeless Services
- City of Tracy Code Enforcement
- Housing Authority of the County of San Joaquin
- The Surland Companies
- Lennar Homes of California
- Meritage Homes
- Bright Development
- Coalition of Tracy Citizens to Assist Homeless
- San Joaquin County Homeless Initiatives
- Tracy Community Connections Center
- San Joaquin Fair Housing
- BIA of the Greater Valley
- Neighborhood Preservation Division, San Joaquin County
- Tracy Family Resource Center
- Tracy Seniors Association
- Central Valley Low Income Housing Corporation
- HBR Rentals
- Crown Key Realty
- At Home Real Estate
- HERO Real Estate

The City made a comprehensive effort to reach lower- and moderate-income individuals to participate in the Housing Element Update. As noted above, the City developed a bilingual outreach campaign, contacted a variety of local organizations including advocacy groups and the fair housing service provider, local service providers, and community centered organizations.

Housing Element Update Website

The City created the Housing Element update webpage on the City's website to provide:

- Background and information on the Housing Element process;
- Link to the Housing Element update survey;
- Documents related to the Housing Element, including the first public review draft;
- Presentation materials and recordings of presentations
- Notification to the public of future events

Stakeholder Interviews

The City contacted over 30 individuals and groups including service providers nonprofits, and other identified stakeholders to participate in focus group interview about the housing needs and issues in Tracy. Out of the 30 individuals and groups that were contacted, 17 individuals participated in the three focus group held: April 10, 2023 at 12:00 p.m.; April 17, 2023 at 12:00 p.m., and one on April 19, 2023 at 12:00 p.m. where the group was divided into 2 breakout rooms for discussion. Multiple dates and times were offered for increased flexibility to accommodate various schedules; however, all of the participants requested a 12:00 p.m. time. The stakeholders who participated discussed a variety of concerns including:

- Residential Growth Allotment (RGA) as a possible constraint to growth and the development review process;
- A lack of affordable housing options and how to incentivize senior and affordable development in the City;
- High development and impact fees;
- Tracy does not have the capacity to support people experiencing homelessness, most of the social services and housing resources are located in Stockton; and
- Need for more education and outreach to inform residents of housing law and what affordable housing is, to shift the perceived stigma.

Balancing Act

The City utilized the Balancing Act online interactive tool to gather input and help inform staff, the Planning Commission, and City Council on decisions regarding the Housing Element. The Balancing Act allows the public to allocate density/housing units to areas of the City that correspond to the opportunity sites identified in the sites inventory, with the goal to allocate housing units and density until the RHNA is reached. The results provide the City with the preferences of the public as well as an educational tool for the public that describes the challenges and choices related to the Housing Element opportunity sites strategy. The tool received 400 total pageviews and 14 completed housing element simulations (https://tracy_housing.abalancingact.com/tracy-heu). The following areas were the top three areas identified by the participants where housing should be allocated and increased.

1. Valpico Rd sites (Areas 8A, 8B, and 8C)



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2. The Bowtie sites (Areas 7A, 7B, 7C, and 7D)



3. I-205 Corridor sites (Areas 1A and 1B)



Public Workshops

Two City-staff led public workshops were held to review Housing Element issues and concerns. The workshops were conducted at the Tracy Transit Center in an open house format where the public could drop in at any time during the 2-hour time period. The Balancing Act was available as an interactive element during the workshops. The workshops were held on the following dates:

- Tuesday, May 23, 2023, 6:30 p.m. – 8:30 p.m.
- Saturday, May 27, 2023, 9:30 a.m. – 11:30 a.m.

Study Session

The City held a special joint City Council and Planning Commission study session on March 22, 2023. The session included a detailed presentation of the requirements of the 6th cycle Housing Element Update, the RHNA requirements and the preliminary opportunity site selection strategy and results. This included identification of the need to increase densities through zoning amendments and rezones to meet the RHNA. The presentation was followed by a robust question and answer session, including comments and questions from members of the public, Planning Commission and City Council, and city staff. The session served to establish a foundation of understanding of the requirements and challenges facing the City of Tracy. It was recorded and posted on the City housing element update webpage for future reference and to increase knowledge and understanding throughout the update period.

Housing Element Survey

Another component of the outreach effort was the Housing Element survey, posted on the City's website from March 2023 through September 2023, and promoted through several public channels to provide the furthest reach. The survey was available in both English and Spanish. As of August 2023, a total of 138 completed surveys were received. Respondent characteristics represented the following.

- 59 percent were homeowners and 17 percent were owners;
- 58 percent have lived in Tracy over 10 years;
- 19 percent were seniors (over 65 years old); and
- 16 percent were experiencing housing insecurity in Tracy (i.e., trouble paying rent, poor housing quality)

Homeowners expressed interest in considering ADUs for accommodating their parents, relatives, and children, as well as for generating additional income. However, homeowners identified the main obstacles for ADU construction as costs and challenges related to technical design, permitting, and construction processes.

Additionally, the following results highlight the perceived difficulties in finding affordable housing as well as challenges related to neighborhood conditions and existing housing conditions in Tracy.

- Over 50 percent of respondents strongly agreed that it is difficult to find affordable rental housing in Tracy;
- 60 percent strongly agreed that it is difficult to find affordable homes for purchase in the City;
- 45 percent strongly or somewhat agreed that conditions of neighborhoods (streetlights, sidewalks, parks, etc.) were the foremost challenge in the community; and
- 39 percent strongly or somewhat agreed that the condition of existing housing and property maintenance is the foremost challenge facing the community.

Public Hearing

Following the release of the first public draft, the City held one joint Planning Commission and City Council in-person public hearing on Tuesday October 24, 2023, at 5:00 PM. The purpose of the meeting was to give the public and the City's decision makers an opportunity to provide comments and suggestions prior to sending the draft to HCD for its review.

3. Findings

Most focus group attendees and survey respondents support the provision of more housing assistance, financial or policy based, for the low-income population in finding housing. In summary, the community engagement and input yielded the following themes and feedback:

- **Education and Outreach:** Participants expressed the challenges and barriers for community engagement and education as it related to affordable housing, available housing services and programs, and housing policy and law. Program 6 provides outreach and education on homebuyer resources. Program 17 includes an action to promote housing programs and services via social media platforms. Program 17 geographically targets outreach in lower resource, lower income neighborhoods.

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- **Prioritizing Housing for a Variety of Incomes:** Participants addressed the need for prioritizing development for a mix of income levels as well as a variety of housing types. Program 7 includes actions to expand housing choices in the community (such as tiny home, duplex, triplex, fourplex, and medium density multi-family housing).
- **Residential Growth Allotment (RGA):** Participants expressed the challenges and barriers for developing housing projects as a result of the RGA provision. Program 16 includes actions to improve the effectiveness of the City's GMO to accommodate the RHNA and to monitor the pace of development.

According to local knowledge provided by City staff, the Community and Economic Director recently implemented a Process Review Committee to look at the entitlement review process and how the city organization functions. The goal is to look at how the City processes entitlements and determine if there are opportunities to streamline operations and determine if there are areas that can be improved upon. This group is looking at interactions between City departments and to ensure we follow the timeframes identified in the permit streamlining act, the subdivision map act, CEQA and other legislative requirements.

The City of Tracy is a fast-paced development community and processes a large volume of entitlement permits each year. The City does not have a policy or tradition of holding on to applications and stalling development.

B. City Overview

Much of the fair housing analysis is based upon census data provided at the census tract level. Tracy has a total of fifteen census tracts. Figure C-1 displays the census tracts in the City and the RHNA sites located in each of those census tracts; however, several of the census tracts are not solely in Tracy and have substantial portions in neighboring jurisdictions. As a result, demographic information for these census tracts reflects neighboring communities, as well as Tracy. The western and southern tracts are largely agricultural land uses and include a couple of the larger residential specific plan areas (Tracy Hills and Ellis Specific Plans) in the City. A majority of the northern and eastern tracts include a mix of industrial and agricultural land uses. Tracy is surrounded by unincorporated San Joaquin County, mostly consisting of agriculture land uses.

According to local knowledge provided by City staff, the City of Tracy has been a regional leader in the development of residential, commercial and industrial growth. This City has grown from a population of 34,401 in 1990 to over 98,000 in 2023. This is an increase of 63,599 residents in 33 years.

This amount of growth has been made possible by large scale residential development projects. Although there has been numerous infill development over the years, it has been mainly larger subdivisions and residential specific plans that have driven this sustained residential growth. The City has a history of approving and ultimately working with the development community to ensure projects are built and completed.

Although the majority of development occurs in larger subdivisions, the City has also adopted regulations within the Growth Management Ordinance and its Guidelines that prioritize infill development, by setting aside RGAs each year for projects that meet certain criteria such as affordability, higher density, completion of gaps in infrastructure, and compilation of multiple parcels.

The AFFH section also considers the effect that the selected RHNA sites may have on fair housing. RHNA sites are distributed throughout the City, with many pending project sites in the western and

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southern areas of the City. The sites inventory includes a mix of vacant and non-vacant sites, selected for their access to resources, suitability for multifamily housing, and proximity to upcoming plans for community revitalization, including the City's Ten Year Economic Development Strategic Plan. Additionally, non-vacant sites were selected based on their likelihood to develop during the 6th cycle and the extent to which the existing use may preclude development.

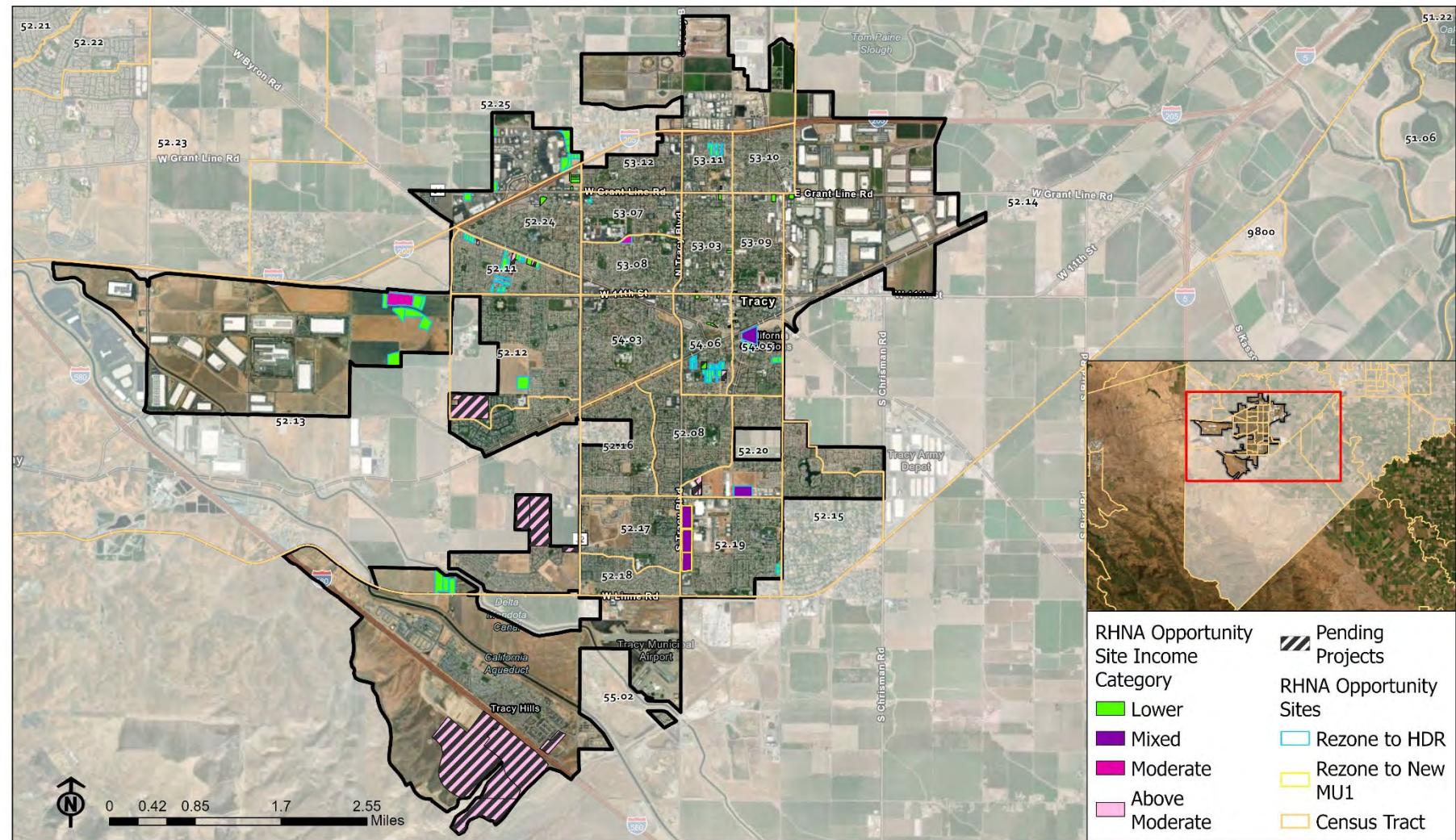
As noted in [Table C-1](#)[Table C-4](#), Tracy is primarily in the high or highest resource categories, with a cluster of smaller, central tracts of low or moderate resource. These are relative rankings based on composites of the environmental, economic, and education scores. The tract in the south is considered a Racially Concentrated Area of Affluence (RCAA).

Of the [151](#) RHNA sites [including pipeline/pending projects](#) (assessor parcels), including pending projects and opportunity sites, [9.7](#) percent of units are in the Low Resource tracts, [7.7](#) percent of units are in Moderate Resource tracts, [19](#) percent are in High Resource tracts, and [63.6](#) percent of units are in Highest Resource tracts.

[Nine](#) of the [13](#) census tracts that intersect Tracy have the majority of their area located inside City limits. [18.7](#) percent of the units are in the tract with the second highest median income [and 41.1%](#) [with the third highest median income](#).

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Figure C-1: RHNA Opportunity Sites by Tract



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Table C-1: Comparison of Fair Housing with Respect to Location

Census Tract	Low	Mod	Above Mod	RHNA Units	Total HH	Total Pop	TCAC Composite Category Resource	Median Income	% with Disability	% of Children in FHH	CES Percentile	% Non-White	R/ECAP Present
Census Tracts Mostly Inside of Tracy													
52.09	459	604	246	<u>12.9%</u>	1,309	725	2,547	Highest	\$95,478	5.6%	10.9%	28.3	61.3%
53.02	31	0	0	0.3%	31	1,071	1,172	Low	\$90,994	13.7%	16.3%	78.6	70.4%
53.03	59	6	0	<u>0.6%</u>	<u>65</u>	1,757	1,048	Moderate	\$64,522	6%	27.2%	61.2	66.6%
53.05	162	0	10	<u>1.7%</u>	172	972	1,609	Low	\$96,250	7.8%	33.3%	66.5	68.7%
53.07	<u>23</u>	0	0	<u>0.2%</u>	<u>23</u>	1,040	1,829	Moderate	\$74,091	12.2%	7.8%	60.9	62.1%
53.08	<u>0</u>	<u>0113</u>	0	<u>1.1%</u>	<u>113</u>	1,337	867	Moderate	\$88,602	8.4%	18.6%	53.6	72.8%
54.03	9	0	0	0.1%	9	2,006	1,594	High	\$106,328	12.1%	19.5%	43.1	67.7%
54.05	<u>208348</u>	<u>354214</u>	11	<u>5.7%</u>	573	1,103	1,282	Moderate	\$81,790	9.4%	8.8%	55.7	73.1%
54.06	<u>745</u>	0	37	<u>7.7%</u>	<u>782</u>	1,044	2,372	Low	\$64,605	13.1%	22.4%	65.0	60.7%
Census Tracts Mostly Outside of Tracy													
52.02	22	0	0	0.2%	22	1,285	1,179	High	\$160,953	11.3%	2.2%	72.3	62.6%
52.06	<u>960</u>	0	0	<u>9.5%</u>	<u>960</u>	1,395	2,076	Highest	\$95,982	3.6%	0%	57.8	57.2%
52.07	<u>2,808</u>	575	<u>776</u>	<u>41.1%</u>	<u>4,159</u>	865	2,495	Highest	\$126,442	3.2%	17.1%	43.3	74.4%
55.02	<u>0</u>	0	<u>1,892</u>	<u>18.7%</u>	<u>1,892</u>	651	1,439	High	\$150,511	8.2%	3.8%	54.9	62.4%
TOTALS	5,626	1,512	2,972	100%	10,110	15,251	21,509						

Fair Housing Enforcement and Outreach Capacity

Fair housing services are provided to residents of Tracy primarily through the San Joaquin Fair Housing Association (SJFH). San Joaquin Fair Housing is a U.S. Department of Housing and Urban Development (HUD) approved housing counseling agency, which tenants and landlords in San Joaquin County with services that include tenant and landlord workshops, dispute resolution, and housing counseling.

Federal housing discrimination complaints are filed with the HUD Office of Fair Housing Employment Opportunity (FHEO). 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. FHEO data from 2015-2020 shows there were 12 total housing complaints in the City of Tracy, although no complaints were recorded between 2019 and 2020, of which 58 percent were resolved due to "No Cause".

The 2020 San Joaquin County Analysis of Impediments to Fair Housing Choice identified the following impediments in the County related to fair housing enforcement capacity:

- Impediments to the development of second units in Tracy and Lathrop, where some single-family zones do not officially allow for the development of second units, which is required by State law.
- Neither San Joaquin County nor the City of Ripon have updated their definition of family to include non-blood relatives and end restrictions on family size included in their zoning codes.
- Discrimination in lending practices. Non-Hispanic White residents were approved for loans at the highest rate and Hispanic and Latino residents were approved for loans at a higher rate than Black/African American residents. Moderate-income households apply for government-insured loans at the highest rate among all income groups, which suggests that in the Urban County, moderate-income households may struggle to purchase a home with conventional loans.

The City does not have any pending lawsuits, enforcement actions, judgments, settlements, or findings related to fair housing and civil rights. As described below, the San Joaquin Fair Housing Office provides fair housing services to residents, including fair housing inquiries, fair housing investigations, tenant landlord inquiries, and tenant-landlord conciliation/mediation (see page C-10-11).

A review of relevant City policies and regulations shows that the City is in compliance with all State and Federal civil rights and fair housing laws. This includes compliance with the following:

- Fair Housing Act; Title VI of the Civil Rights Act of 1964. The City complies by ensuring its actions related to housing are not discriminatory through City protocols, decision making procedures, and adhering to non-discrimination requirements of federal funding program;
- California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with section 12900) of Division 3 of Title 2) The City upholds policies that prohibit housing discrimination based on protected characteristics and enforces these policies by supporting residents seeking to file a complaint to the FHEO or who wish to pursue legal action;
- Rehabilitation Act of 1973 (Section 504) The City complies through its accessibility protocols, administered and enforced by the City's ADA Coordinator;

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- American Disabilities Act – The City complies with the ADA through building permit review and issuance and as described in Section 3- Housing for Persons with Disabilities;
- California Government Code sections 8899.50, 65008, and 11135. The City has included this assessment of fair housing and identifies strategies to increase housing opportunities for all residents, with specific actions to reduce housing disparities for disadvantaged communities;
- Civil Code section 51 (the Unruh Civil Rights Act); and
- FEHA regulations in California Code of Regulations, title 2, sections 12005-12271;
- Density Bonus Law (Gov. Code, § 65915.) The City's Density Bonus Ordinance was last updated in 2008. The City of Tracy will update its density bonus ordinance to comply with these new provisions as part of the update to the Zoning Ordinance to facilitate affordable/workforce housing (Program 7);
- Housing Accountability Act (Gov. Code, § 65589.5.) The City has documented compliance with the HAA as described in Section III, Governmental Constraints;
- No-Net-Loss Law (Gov. Code, § 65863) Density Bonus Law The City complies with the No Net Loss Law by identifying sites that can accommodate the City's RHNA. The City also maintains minimum density requirements for housing development in Medium and High Density Residential zones;
- Least Cost Zoning Law (Gov. Code, § 65913.1) The City includes programs in this Housing Element to ensure that sufficient land is zoned with appropriate standards to accommodate its RHNA;.
- Excessive subdivision standards (Gov. Code, § 65913.2.) The City's subdivision standards are typical or not excessive in compliance with the Government Code;
- Limits on growth controls (Gov. Code, § 65302.8.) and The City complies as it has no growth control measures; and
- Housing Element Law (Gov. Code, § 65583, esp. subds. (c)(5), (c)(10).) This Housing Element documents compliance with Housing Element Law; and.
- Government Code Section 65008. The City Zoning Code is written to ensure that the City's actions regarding the development of housing for persons and families of very low, low, moderate, and middle incomes, or emergency shelters for the homeless, are not discriminatory. Programs have been included in this Housing Element to remove constraints and facilitate housing for all households, including protected classes (e.g., programs regarding residential care facilities, emergency shelters, etc.)

Any legal matters and litigation in the City since the beginning of the 5th Cycle have not been related to fair housing. The City also has no local laws relating to fair housing and housing choice.

Federal housing discrimination complaints are filed with the HUD Office of Fair Housing Employment Opportunity (FHEO). 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. FHEO data on inquiries and cases of fair housing discrimination from 2013-2022 is included in the table below. Disability, Race, Retaliation, and Sex were among the most common topics of inquiry. With a total of 16 cases over the course of 8 years, the number of cases per 1,000 people is 0.17. Regionwide in San Joaquin County, there are 0.29 cases of fair housing

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discrimination per 1,000 people. This indicates that fair housing is more successful in the City of Tracy compared to the region as a whole.

	<u>Race</u>	<u>Sex</u>	<u>Disability</u>	<u>Retaliation</u>	<u>Familial Status</u>	<u>National Origin</u>	<u>Color</u>	<u>Religion</u>	<u>No Basis Given</u>	<u>Total</u>
<u>Cases</u>	<u>4</u>	<u>3</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>1</u>	<u>1</u>	<u>-</u>	<u>16</u>
<u>Inquiries</u>	<u>0</u>	<u>0</u>	<u>4</u>	<u>2</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>19</u>	<u>23</u>

The San Joaquin Fair Housing Office provides fair housing counseling services for the City of Tracy, including investigating fair housing complaints of housing discrimination, providing outreach and education to housing providers, and assisting residents with filing complaints with state and federal enforcement agencies such as the Department of Fair Employment and Housing (DFEH) and the HUD Office of Fair Housing and Equal Opportunity (HUD FHEO). San Joaquin Fair Housing is a nonprofit organization that provides a variety of fair housing resources and services, including resources for tenants, property managers, and service providers, dispute resolution, and housing counseling.

Local stakeholder have emphasized the need for more education and outreach to inform residents of housing law and what affordable housing is, to shift the perceived stigma. As part of Program 17, the City will continue to partner with the San Joaquin Fair Housing Office to combat housing discrimination and to educate residents, landlords, and developers on their fair housing rights and responsibilities. The City also has a page on their website which describes the expectations of landlords, and includes a direct link to file a complaint or receive tenant/landlord mediation services with either the San Joaquin Fair Housing Office or the FHEO.

C. Integration and Segregation

1. Race and Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns because it can demonstrate the relationship with other characteristics such as household size, locational preferences and mobility. The racial categories included in the census questionnaire generally reflect a social definition of race recognized in this country and not an attempt to define race biologically, anthropologically, or genetically.

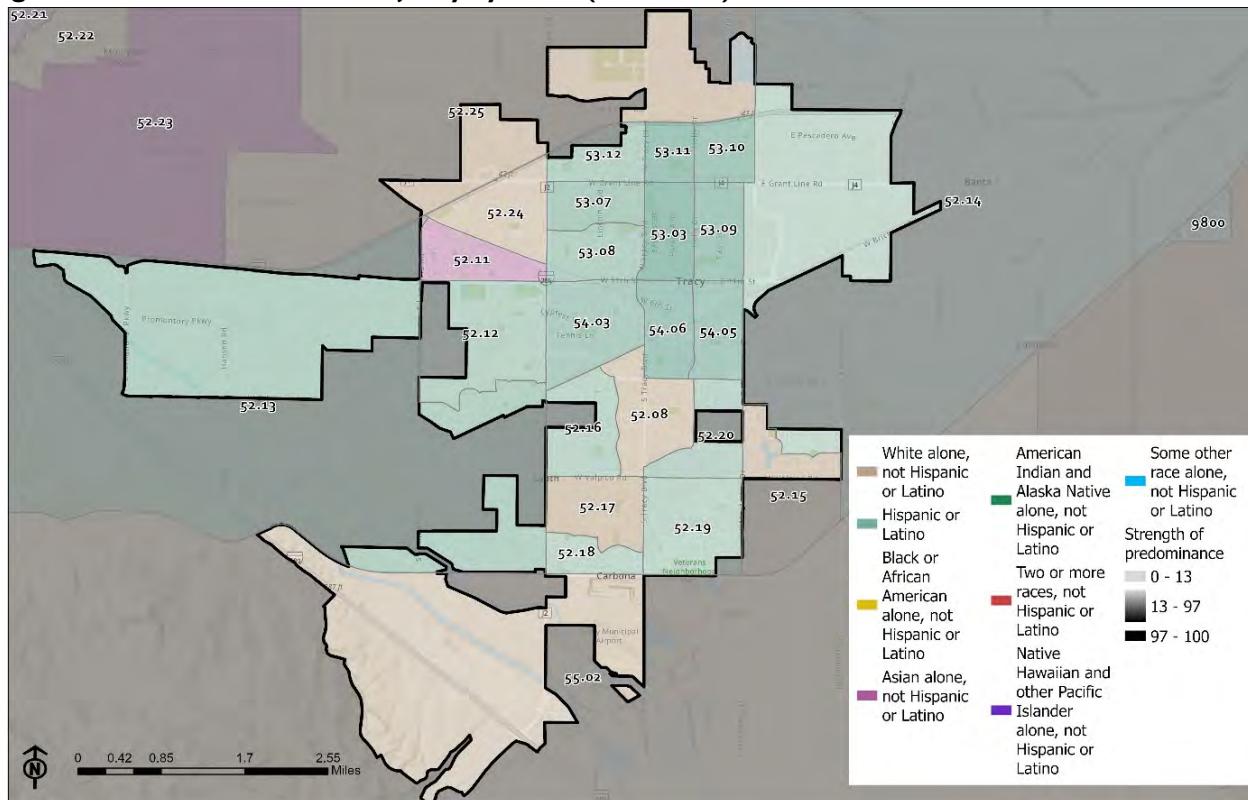
Figure C-2 shows the racial and ethnic majority by census tract in the City of Tracy. As illustrated, a majority of the City has a Hispanic majority, while the southernmost areas of the City having a predominant (>50%) White majority. The census tracts near the center of Tracy which consist of downtown have sizeable (10 - 50%) to predominant (>50%) Hispanic majorities, and there is a small tract in the western part of the City with a slim (<10%) Asian majority. The area with the predominant Hispanic majority also has a larger low- to moderate-income population. The central city and downtown areas are where the Hispanic majority is most prominent and are also where the TCAC (Tax Credit Allocation Committee) composite categories are Low to Moderate Resource opportunity. These are also two of the top three priority areas for economic investment and development as identified in the City's 10 Year Economic Development Strategic Plan that was adopted in September 2023. The other areas of the City are identified as the High and Highest resource areas of the City.

According to local knowledge provided by City staff, the areas south of the Tracy Transit Station, east of Tracy boulevard, west of the railroad, and north of Schulte have a higher concentration of the non-White community than the rest of the City. The unit sizes are fairly small so there is not a known concentration of multigenerational households. These communities are primarily workers in older

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homes, in addition to a trailer park with a history of code enforcement issues. In the neighborhood Palm Circle, the HOAs have become defunct, and the City has taken over the majority of neighborhood management. This neighborhood is known to have a lot of Spanish speaking residents. These local knowledge observations are consistent with the concentrations of the Hispanic population shown in the Figure below.

Figure C-2: Racial and Ethnic Majority by Tract (2017-2021)



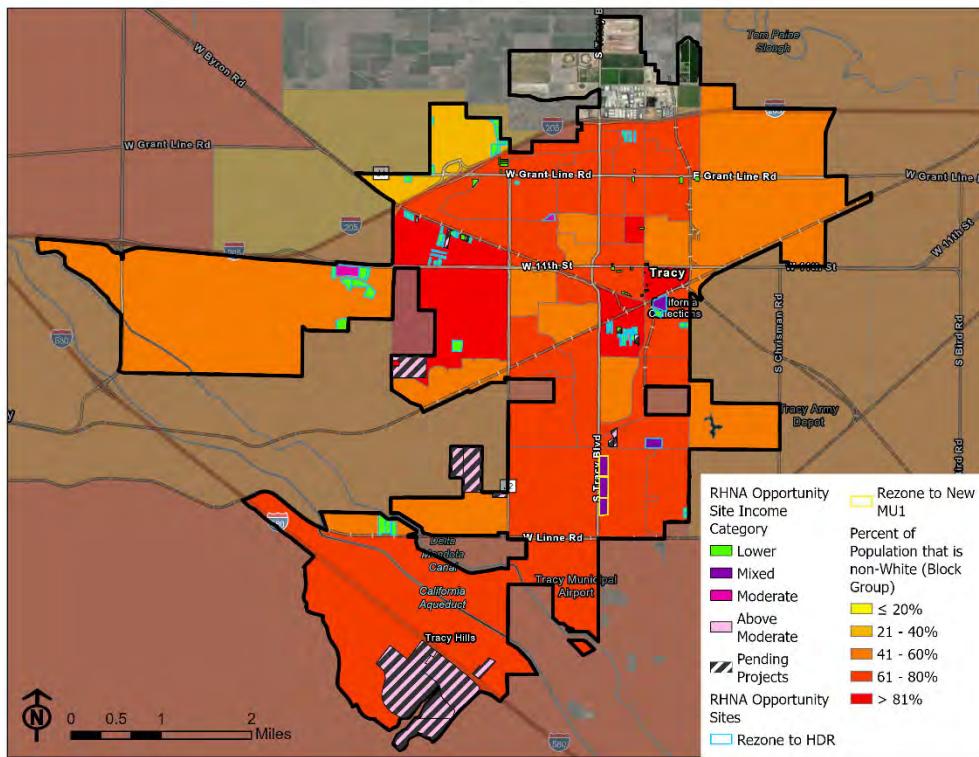
Source: HCD AFFH Data Viewer

Regionally, there is a common correlation between wealth and race, which may help to explain the racial/income concentrations within the City. The City has a similar racial distribution as the County as a whole, with a population that is 43 percent Hispanic in Tracy, and a population that is also 43 percent Hispanic in San Joaquin County. Tracy has a slightly higher Asian population than the County, at 20 percent compared to the County's 18 percent.

Figure C-3 shows the percent of the population in each block group that is non-White. As shown in Figure C-3, the areas in the southern and central areas of the City have a more predominant non-White population, and the central western region has the most predominant non-White population. There is little correlation between this trend and other fair housing distributions, as the trends in the central and downtown areas of the City have minimal correlation with the southern areas of the City. As of 2021, 74 percent of the population in Tracy is non-White, while 72 percent of the County is non-White, indicating that the overall distribution of the non-White population is similar between the City and the region as a whole.

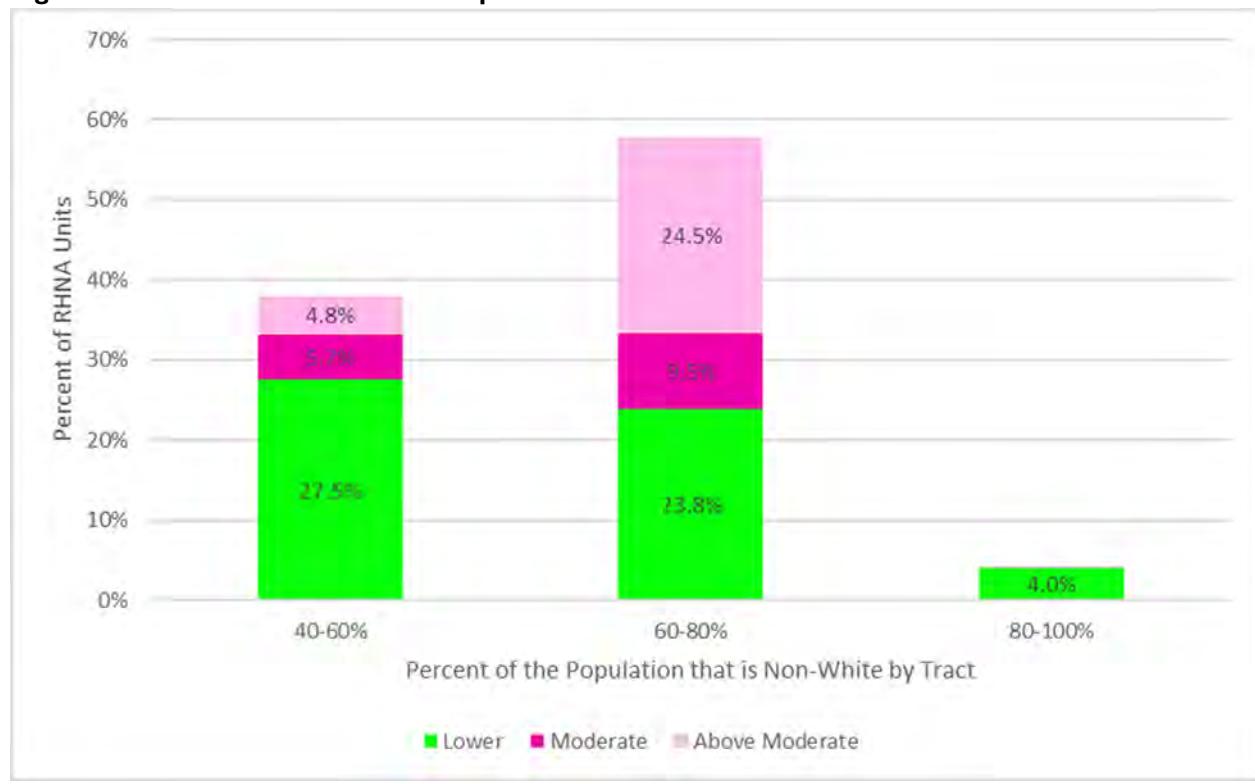
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Figure C-3: Percent of the Population that is Non-White and RHNA Sites, 2018



Source: HCD AFFH Data Viewer

Figure C-4 compares the RHNA Units with the percentage of the population that is non-White. About two-third of the RHNA units are in the areas where 60 to 80 percent of the population is non-White and about one-third is in areas where 40 to 60 percent of the population is non-white (predominately agricultural/industrial land), which is reflective of trends in the City as a whole. Local stakeholders noted a lack of affordable housing options and asked for increased affordable development in the City. The area where 60 to 80 percent of the population is non-white includes a majority of the City and where the established (central) and newer (west) single family residential neighborhoods are located, subsequently the majority (approximately 60%) of the RHNA units also fall within these areas. -The Tracy Hills specific plan will be targeting revitalization and place-based improvements in some of the census tracts where 60 to 80 percent of the population is non-white. The areas where more than 80 percent of the population is non-white includes the areas of the City that were previously unincorporated San Joaquin County parcels, downtown Tracy, as well as the older residential areas that supported the railroad during the original development of the City. -The plan includes environmental enhancements, a range of housing opportunities, and economic development. Opportunity sites are well distributed across all levels of concentration of the non-White population throughout the City. The City's RHNA strategy is not expected to exacerbate conditions of segregation.

Figure C-4: Percent Non-White Comparison of RHNA Units

Dissimilarity Index – Race and Ethnicity

Segregation is defined by the census as the spatial distributions of different groups among units in a metropolitan area.¹ Segregation can be quantified by using the dissimilarity index. The dissimilarity index measures the distribution of two groups in a city and assigns a score between 1 and 100. The level of segregation is determined by assessing what percentage of residents of a census block would have to move for each block to have the exact same population of said group. A score of zero (0) reflects a fully integrated environment; a score of 100 (or 100%) reflects full segregation. Therefore, a higher dissimilarity index indicates higher concentrations of the indicated ethnic groups in areas of the City, when compared to the White population distribution. A lower dissimilarity index implies higher integration, and a more even distribution of each ethnicity when compared to the White population. The formula for this calculation is provided by California Department of Housing and Community Development's (HCD) AFFH Guidance Document.

The categories for the dissimilarity index on a scale of 1-100 are as follows:

- <30: Low Segregation
- 30 – 60: Moderate Segregation
- >60: High Segregation

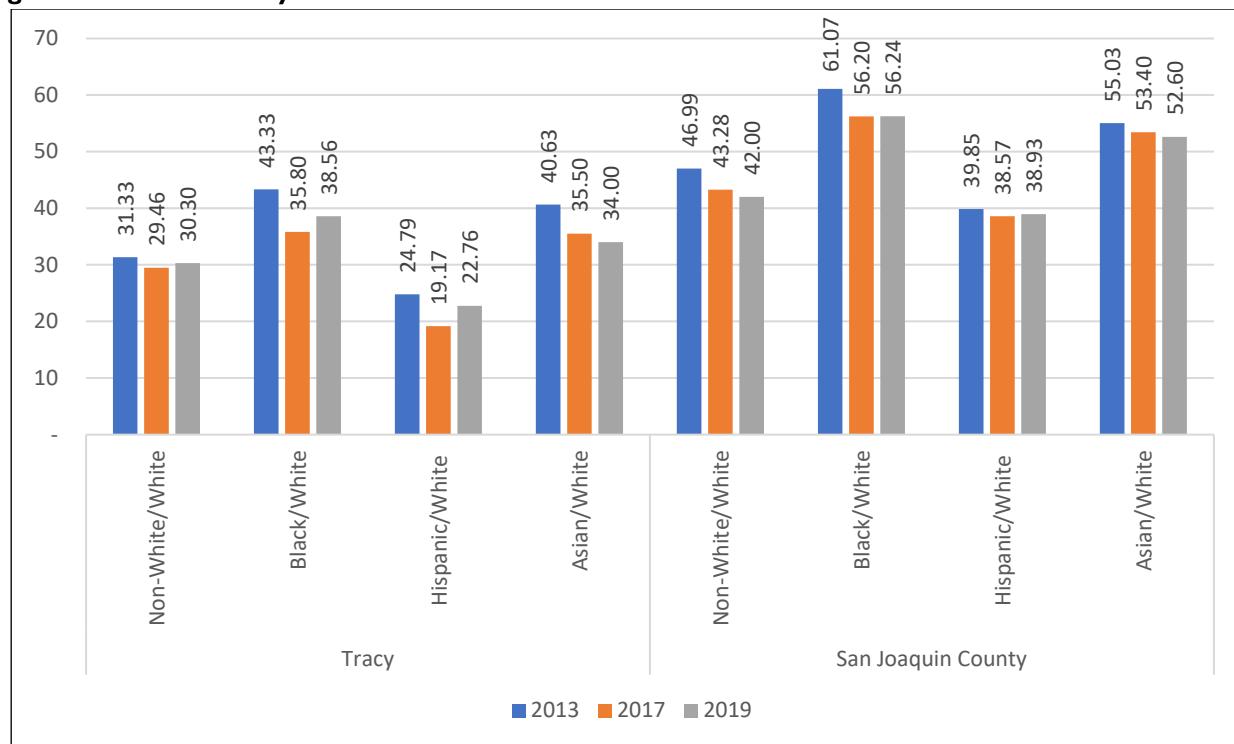
Figure C-5 provides the dissimilarity index values in Tracy, indicating the level of segregation between White residents and residents who are non-White, Black, Hispanic, or Asian. In 2019, there was moderate segregation between the non-White and White populations, the Black and White populations, and the Asian and White Populations. There was low segregation between the Hispanic

¹ Measures of Residential Segregation <https://www.census.gov/topics/housing/housing-patterns/guidance/appendix-b.html>

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and White populations. A moderate dissimilarity index of 30.30 in the figure below means that 30.30 percent of Tracy's non-White or White residents would need to move to a different census block to create balanced integration between non-White and White residents. Segregation at the City level is much lower than San Joaquin County as a whole. The segregation indices have all decreased since 2013. [According to local knowledge provided by City staff, disparities between areas of the City may be attributed to recently annexed areas lacking proper infrastructure, water, sewer, or sidewalks. The City is revising the CIP process to close gaps in infrastructure. This includes the Mt Oso condominiums getting infrastructure. The Downtown Vision Plan park of October 2024 utilizes housing related funds to remediate the soil on a contaminated City-owned site with high density housing, and to close the infrastructure gaps between this neighborhood and downtown. The City is closing gaps on Corral Hollow Rd, Lammers Rd, Valpico Rd, and gaps between new subdivisions.](#)

Figure C-5: Dissimilarity Index for Race



Source: ACS 2013, 2017, and 2019 5-Year Estimates (B03002)

2. Income

The dissimilarity index can also be used to calculate income segregation, using the same scale as above. In the City of Tracy, the income dissimilarity index between the low to moderate income population and the above moderate income population was 37.57 as of 2015. This is a moderate level of income segregation. San Joaquin County also had moderate income segregation, with an index of 37.2.

As shown in Figure C-6, the area with a large low to moderate income population is also the area with a predominant Hispanic majority, and the low to moderate resource TCAC designations. There is a smaller low- to moderate-income population in the area with more single-family housing. Income often correlates with housing type—i.e., large single-family areas generally have higher incomes. Compared to the region, Tracy has a higher median income, but a comparable amount of income disparity.

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Figure C-7 shows the percentage of RHNA units compared to the percent of each tract that is in the low- to moderate-income category. About 85 percent of RHNA units are in areas where less than 25 percent of the population is low to moderate income. These areas include the newer single family residential area including specific plan areas, agricultural/vacant land, and the regional commercial center in the northwest part of the City. These are the areas of growth for Tracy.

In 2019, the City allocated \$112,000 in Home Investment Partnership Program funds to the San Joaquin County Housing Authority and Stone Pine Meadows, a 72-unit apartment complex for lower-income households. In fiscal year 2021, the City allocated \$163,461 in Home Investment Partnership Program funds to the San Joaquin County Housing Authority to support the demolition and reconstruction of a 55-unit low-income apartment project (Tracy Senior Living). Phase 1 of the project involves the demolition of 17 obsolete units and Phase 2 involves the reconstruction of 55 energy-efficient units for very low income seniors. This project is anticipated to be completed in 2026. In 2020, City Council allocated \$4 million to the Housing Authority of San Joaquin County for the rehabilitation of existing low-income housing units.

The areas of 25 to 50 percent of the population is low to moderate income of the City include the downtown, the older single family residential neighborhoods, and the industrial warehouse uses on the northwestern part of the City. This central area of the City also has the most mix of uses and amenities. Local stakeholders noted a lack of affordable housing options and asked for increased affordable development in the City. Housing mobility is being encouraged by proposing lower and moderate income RHNA sites, and the accompanying rezoning, in the areas with a smaller low- to moderate-income population. The City's RHNA strategy is not expected to exacerbate conditions of segregation.

According to local knowledge provided by City staff, the central areas south of the Tracy Transit Station, east of Tracy boulevard, west of the railroad, and north of Schulte Rd have a higher concentration of the lower-income population than the rest of the City. This is consistent with concentrations of the non-White population. These communities are primarily workers in older homes, in addition to a trailer park with a history of code enforcement issues. These local knowledge observations are consistent with the concentrations of the low-to moderate-income population shown in Figure C-6 below.

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Figure C-6: Sites Inventory and Low to Moderate Income Populations by Tract (2017-2021)

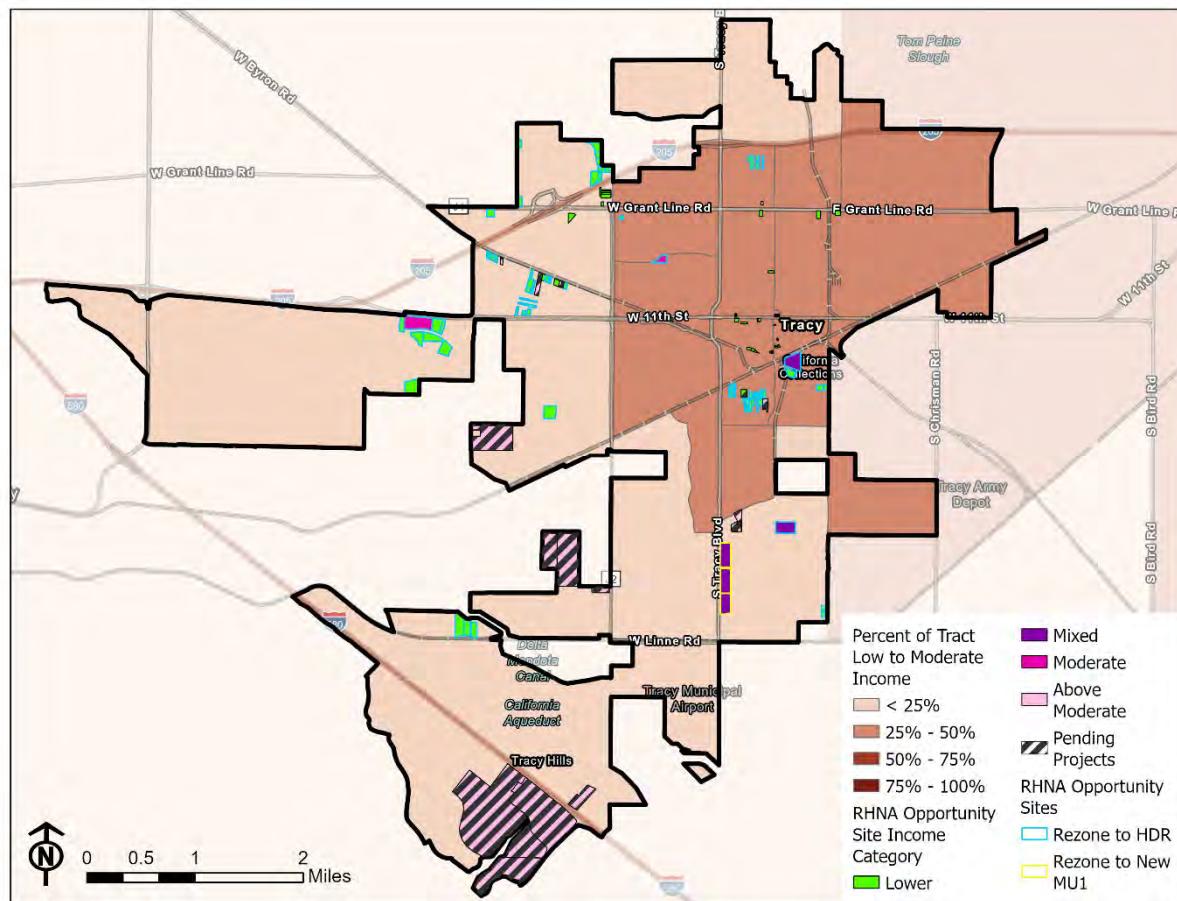


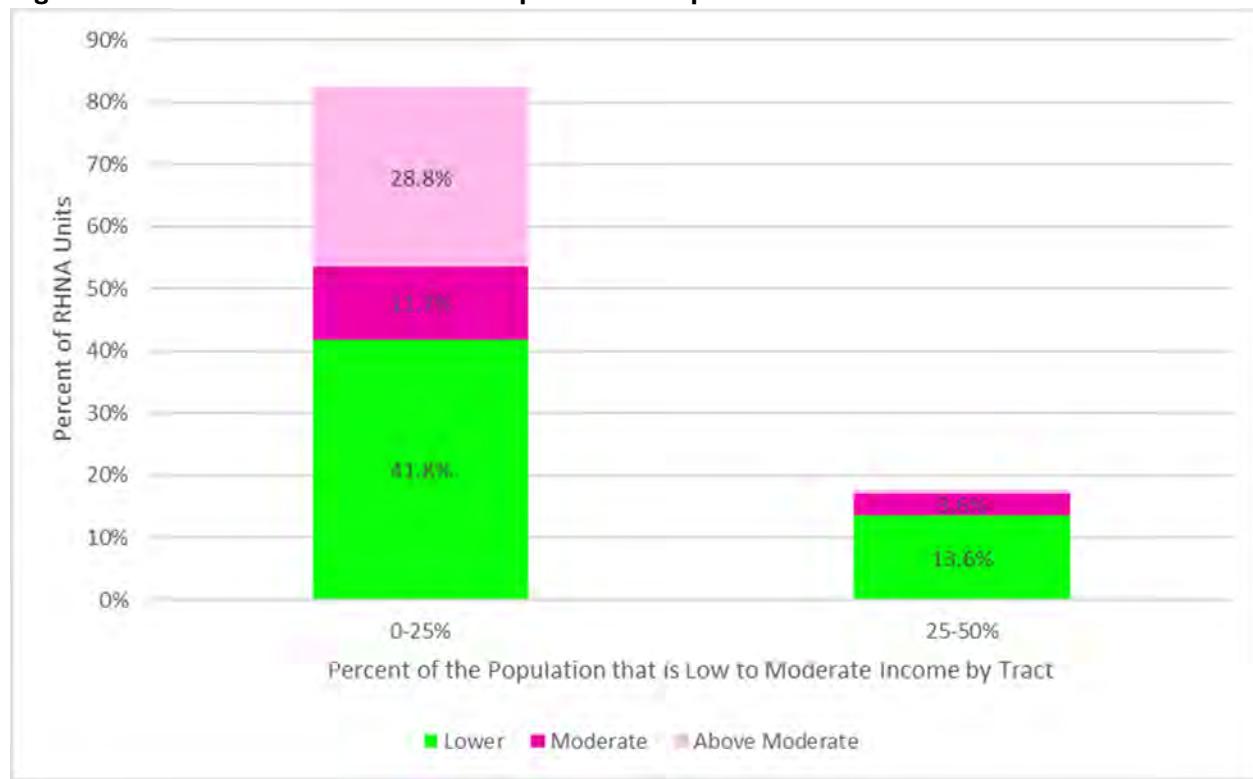
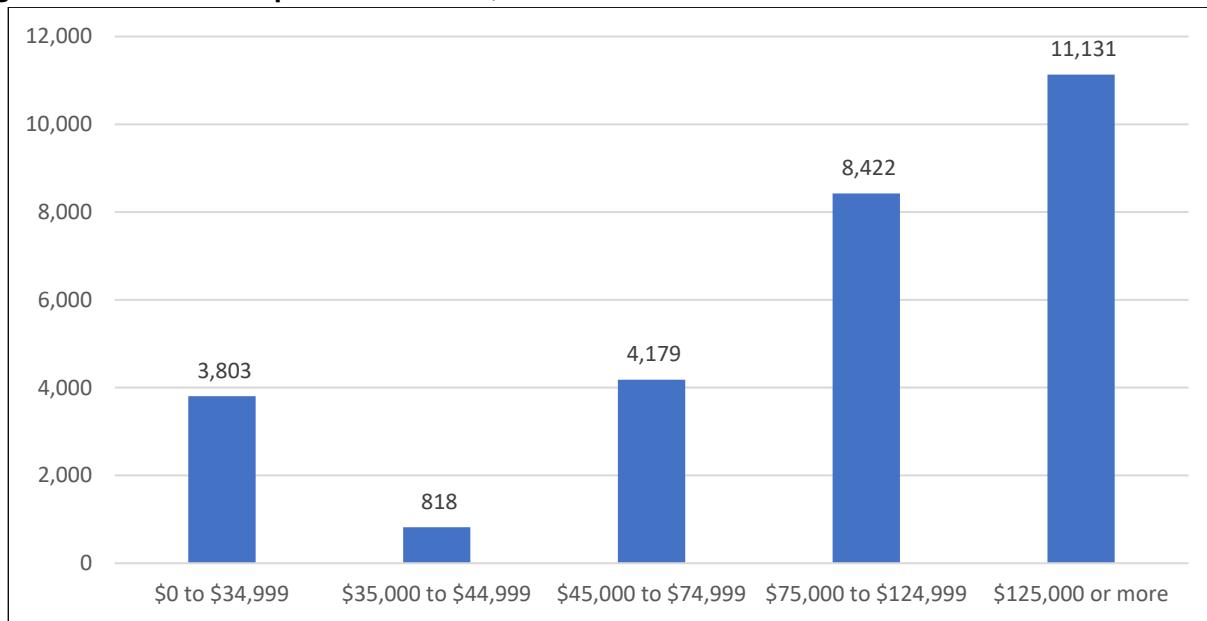
Figure C-7: Low to Moderate Income Population Comparison of RHNA Units

Figure C-8 shows the number of households with income levels similar to the income ranges provided by the HCD Income Limits. The above-moderate income category has the largest percentage of the population, while the very low-income category has the smallest population. The moderate-income category is relatively predominant, while the size of the extremely low population and low-income population is relatively comparable.

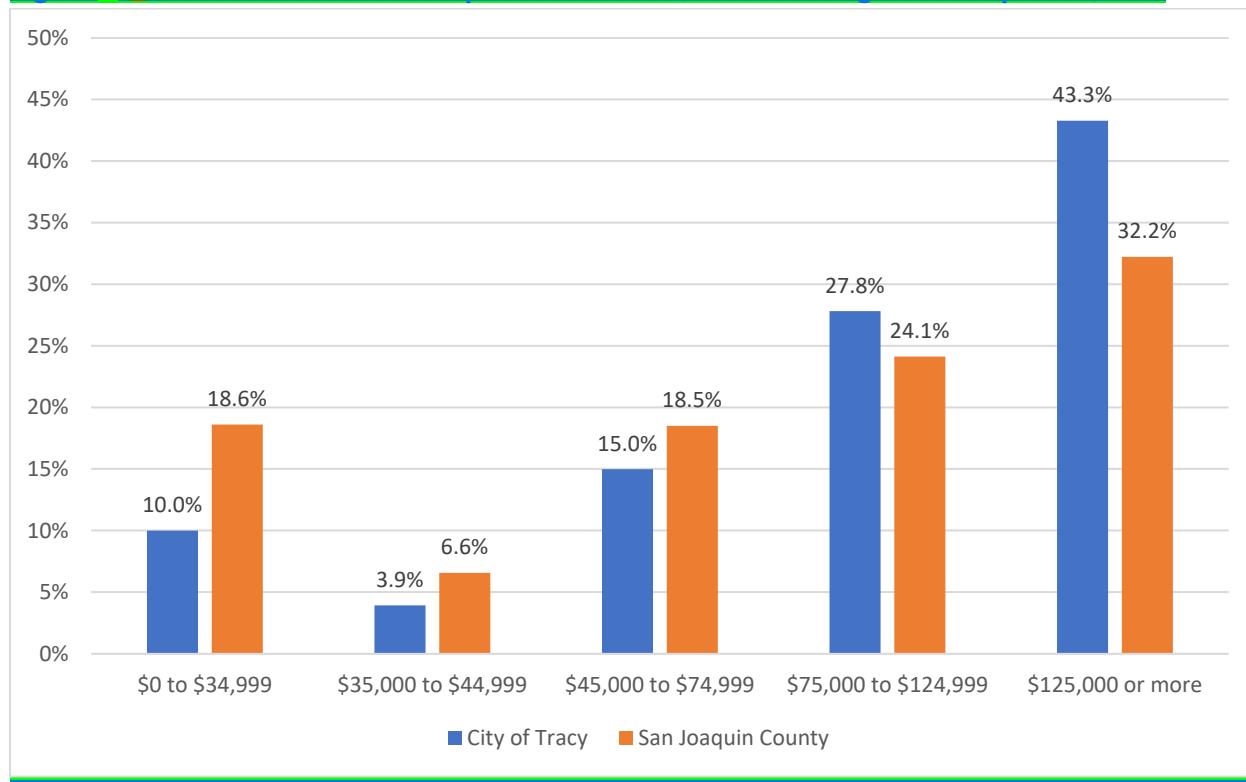
Figure C-8: Households per Income Level, 2021

Source: 2021 ACS Table B19001

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Approximating the AMI by census data on household income ranges indicates that the City of Tracy has a higher proportion of the Moderate and Above Moderate income populations than in the County as a whole. Local stakeholders have indicated a desire for more affordable housing within the City. The City included Program 12: Accessory Dwelling Units, to provide for additional housing options in higher-income areas of the City. The program includes informative sheets and brochures, and development of incentives to increase the production of ADUs include financial assistance with construction, pre-approved plans, and technical assistance. The City is also including Program 7: Affordable/Workforce to introduce middle income housing in existing single-family neighborhoods and to facilitate the development of medium density multi-family housing through encouraging duplexes, triplexes, and fourplexes in new single family subdivisions.

Figure C-98. Percent of Households per Income Level, Local and Regional Comparison, 2022



Source: 2022 ACS Table B19001

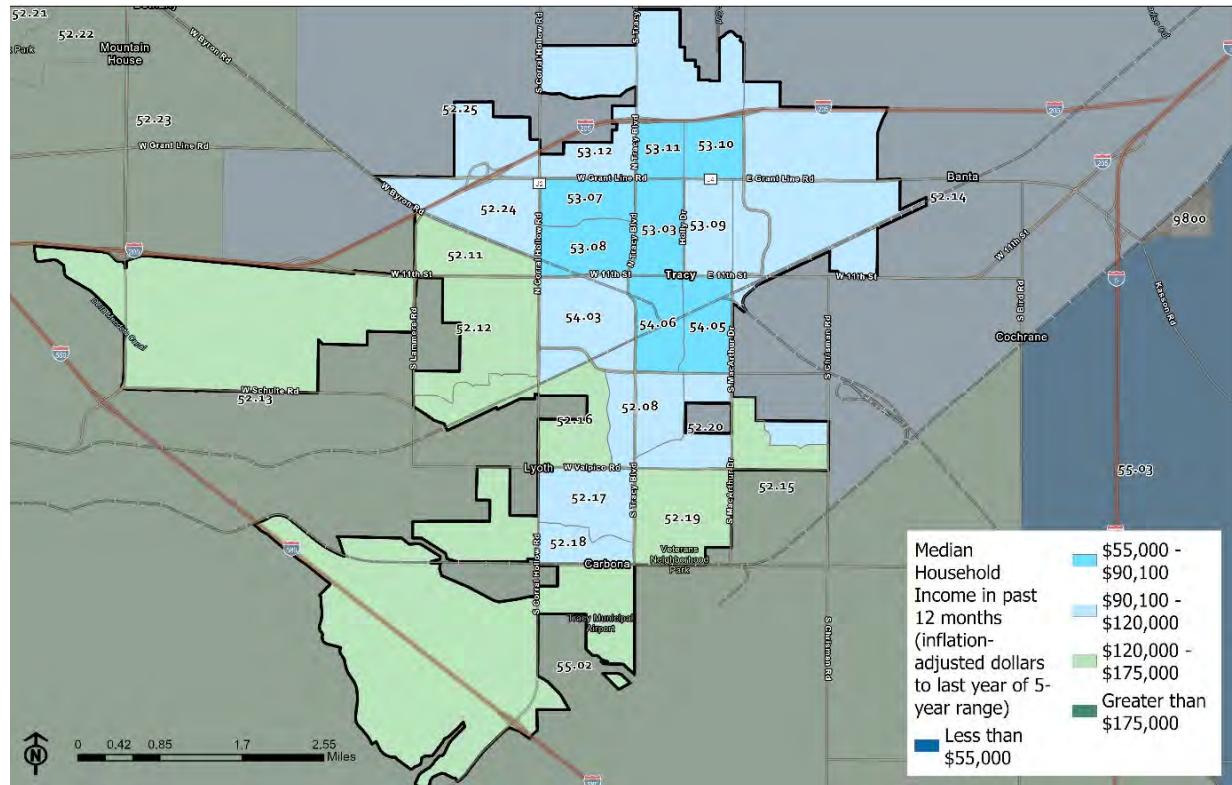
According to U.S. Census 2016-2020 American Community Survey estimates, the median household income for Tracy was \$95,741. This is about 40 percent higher than the San Joaquin County median household income of \$68,628.

[Figure C-10](#)[Figure C-9](#) shows median household income by census tract. In Tracy, the highest median household incomes are located in the western and southern portions of the City, where there is newer development, single family neighborhoods, and more open space. The lowest median incomes are in the central downtown and surrounding tracts, which is an older area of the City as seen in [Figure C-11](#)[Figure C-10](#). The western and southern tracts have more open space and agriculture, so the population as a whole is generally more concentrated in the central, downtown areas of the City, which may skew data perception. Additionally, the tracts in the southern and western regions of Tracy have the majority of their acreage outside of the City of Tracy, making it likely that the small portion of tracts within the City are not primarily responsible for overall trends, and the maps may not accurately reflect the conditions in those portions of Tracy. Newer single-

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family development primarily has recently occurred in the west and homes are often more expensive than older small homes in the downtown areas, which correlates with higher income households in these newer western areas. Newer single-family development is also occurring in the specific plans in the southern regions. The City included Program 12: Accessory Dwelling Units, to provide for additional housing options in higher-income areas of the City. The program includes informative sheets and brochures, and development of incentives to increase the production of ADUs include financial assistance with construction, pre-approved plans, and technical assistance.

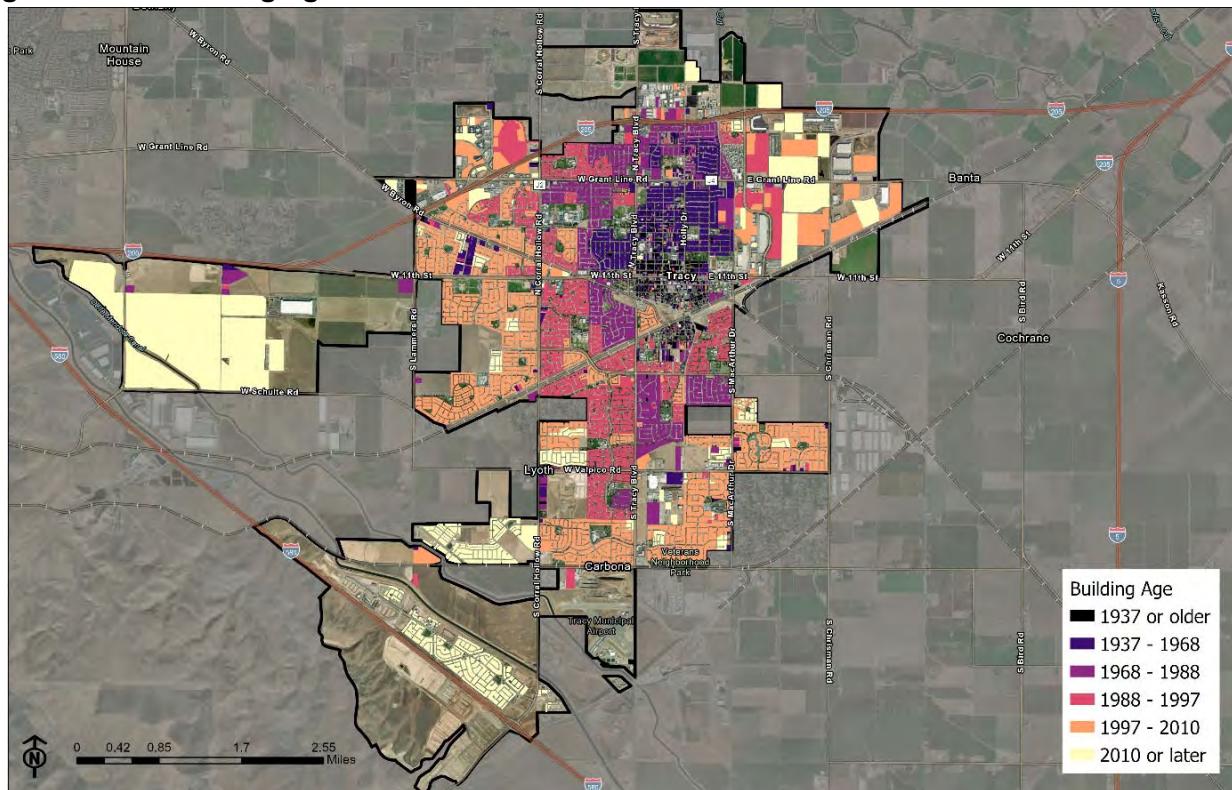
Figure C-109: Median Household Income by Tract (2017-2021)



According to local knowledge provided by City staff, the areas south of the Tracy Transit Station, east of Tracy Boulevard, west of the railroad, and north of Schulte Rd have older housing stock than the rest of the City. The unit sizes are fairly small so there is not a known concentration of multigenerational households. These communities are primarily workers in older homes, in addition to a trailer park with a history of code enforcement issues. In the Palm Circle neighborhood west of the intersection of Tracy Blvd and W 6th St, the HOAs have become defunct, and the City has taken over the majority of neighborhood management. This concentration of older housing stock in the central areas of the City is consistent with what is shown in the Figure C-10 below.

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Figure C-11-10: Building Age



[Figure C-12](#)[Figure C-11](#) and [Figure C-13](#)[Figure C-12](#) show the change in the population under the federal poverty line by census tract from 2010-2014 to 2017-2021. Poverty is defined by incomes falling below the annually defined thresholds for family size by the U.S. Census. As shown in [Figure C-13](#)[Figure C-12](#), poverty levels in the central downtown area of the City have increased over time.

The area with the slightly higher rate of poverty is in the same downtown area which is in the moderate opportunity TCAC designation. In 2021, 9.8 percent of Tracy's overall population was below poverty level. Poverty in San Joaquin County is also low, with overall 7.7 percent of the population living below the poverty level. The City is pursuing a number of investments, long-range planning efforts, and improvements in various geographic areas of the City with greater need, specifically downtown Tracy and central areas of the City. Efforts include the Grand Theater repair, pedestrian and bikeway improvements, and park improvements, as well as a 10 Year Economic Development Strategic Plan and Downtown Transit-Oriented Specific Plan.

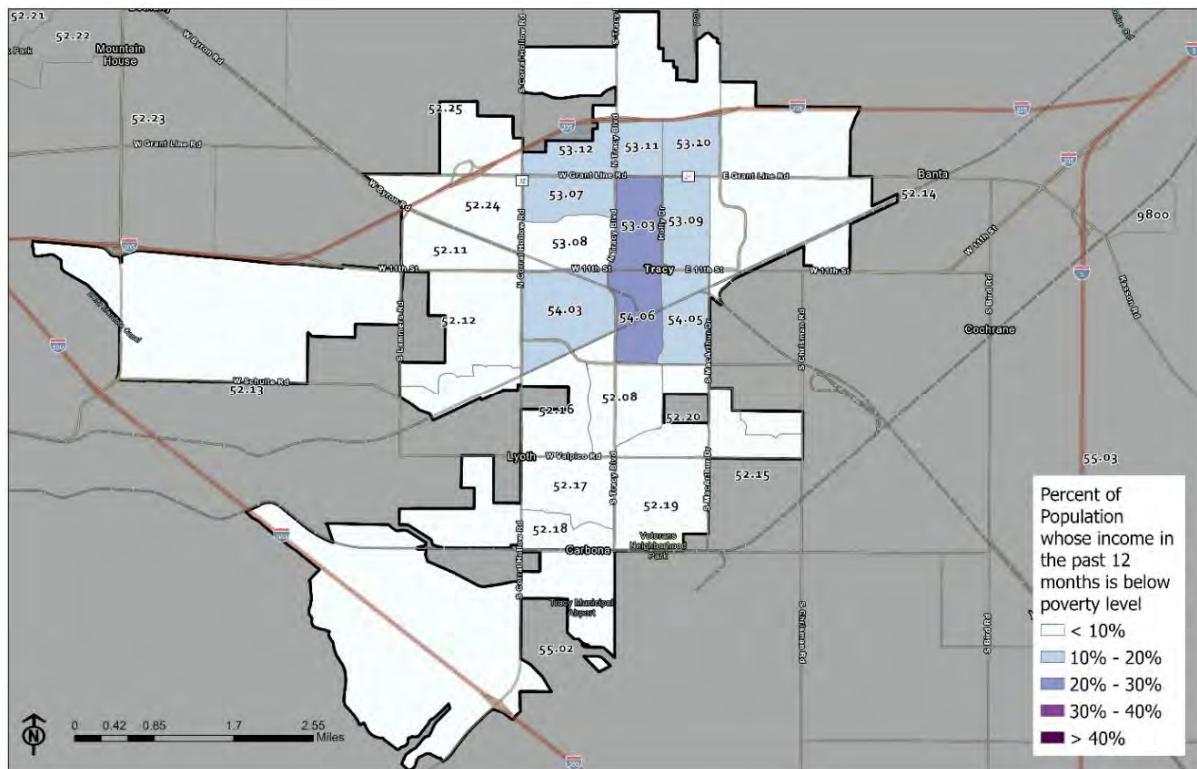
There are two RHNA sites located within an area where the largest percentage of the population is below the poverty line, this area is largely residential with several schools, churches, as well as the Tracy Medical Center. This is a central neighborhood that is fully integrated within the City. The rest of the RHNA sites are located in areas where the percent of the population whose income is below the poverty line is between less than 10 percent to 20 percent. The City's RHNA strategy is not expected to exacerbate conditions of segregation. As RHNA sites are distributed throughout areas of the City and are not concentrated in areas with concentrations of poverty, the distribution of the sites is unlikely to have an effect on distribution of poverty.

According to local knowledge provided by City staff, the areas south of the Tracy Transit Station, east of Tracy Boulevard, west of the railroad, and north of Schulte Rd have a higher concentration

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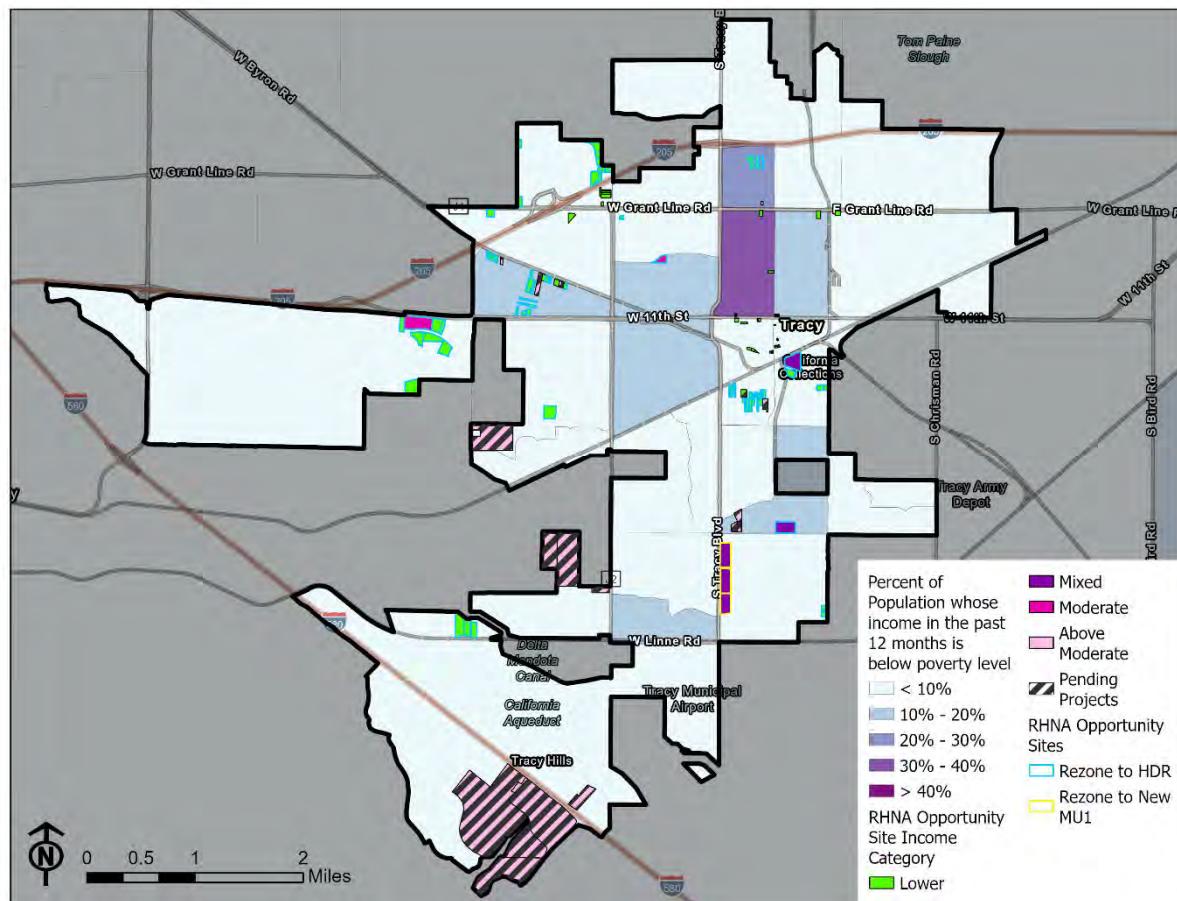
of the lower-income community than the rest of the City. These local knowledge observations are consistent with the concentrations of the population below the poverty line as shown in the Figures below.

Figure C-12H: Poverty Status by Tract (2010-2014)



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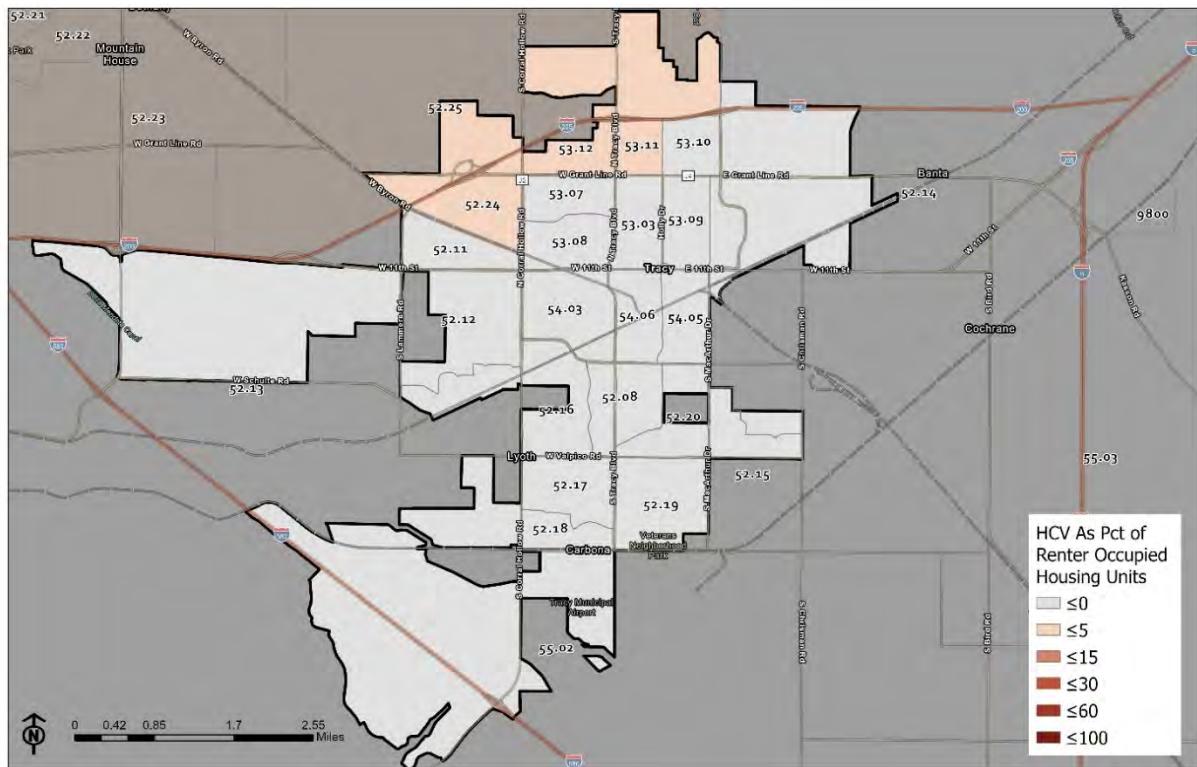
Figure C-13+2: Sites Inventory and Poverty Status by Tract (2017-2021)



Source: HCD AFFH Data Viewer

Figure C-14 displays the distribution of housing choice vouchers (HCV) in the City. The HCV program is a 100 percent federally funded rental subsidy for low-income households living in privately owned rental units. The County of San Joaquin Housing Authority (HACSJ) administers the HCV program for those in Tracy. The HCV program makes payments directly to the landlord and allows households to choose where they want to live, as long as the unit meets minimum standards. Voucher amounts are dependent on family size and income and can expand housing choice and options for those on limited incomes, including those with low incomes, people with disabilities, and the elderly.

The City does not own any public housing; however, HACSJ owns and manages affordable housing units in Tracy and throughout the San Joaquin County. HACSJ owns the Tracy Apartment, a 73-unit affordable senior housing complex with approximately half of the units reserved for special needs seniors. Many of the seniors in this housing complex use housing choice vouchers. There is very little housing choice voucher use throughout the City. **This is consistent with the County as a whole.**

Figure C-14¹³: Housing Choice Vouchers by Tract (2021)

Source: HCD AFFH Data Viewer

3. Familial Status

Figure C-15¹⁴ shows the percentage of children that are living in female-headed households with no spouse by census tract. It also shows pending projects and proposed RHNA opportunity sites. In 2021, 3,052 households, or 12.9 percent of total households in Tracy, were female-headed households, which is about 7 percent lower than in the County, at 19.7 percent. The central, downtown area has a slightly higher concentration of female-headed households, in correlation with higher rates of poverty and lower median incomes. As shown in Figure C-16¹⁵, RHNA pending and opportunity sites are distributed throughout the City and are not expected to impact fair housing concerns based on familial status. The vast majority, about 90 percent of RHNA units are located in tracts where 0 – 20 percent of children are living in female-headed households with no spouse, as the majority of Tracy falls into this category.

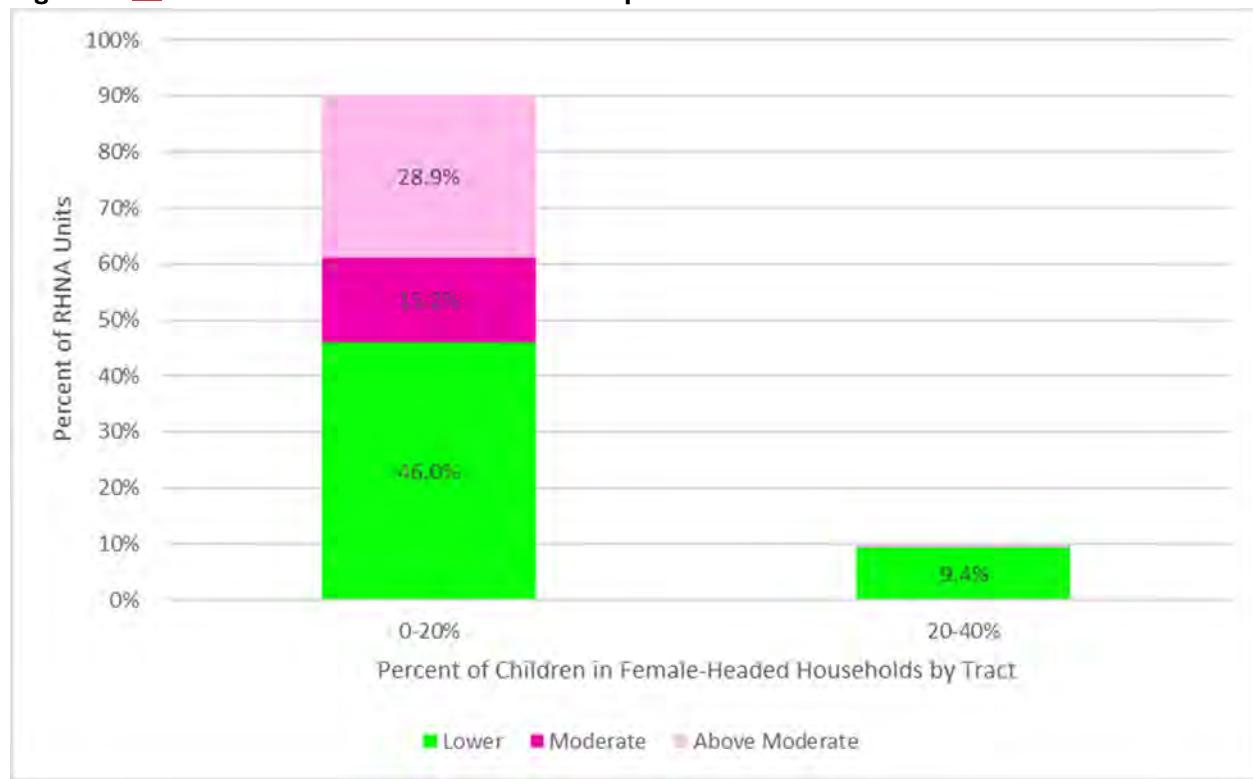
Local knowledge provided by City staff indicated that the City has a high concentration of families. With an average household size of 3.34, the community is primarily children and those over the age of 40. Non-families are primarily silicon valley commuters.

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Figure C-1514: Sites Inventory and Children in Female-Headed Households by Tract (2021)



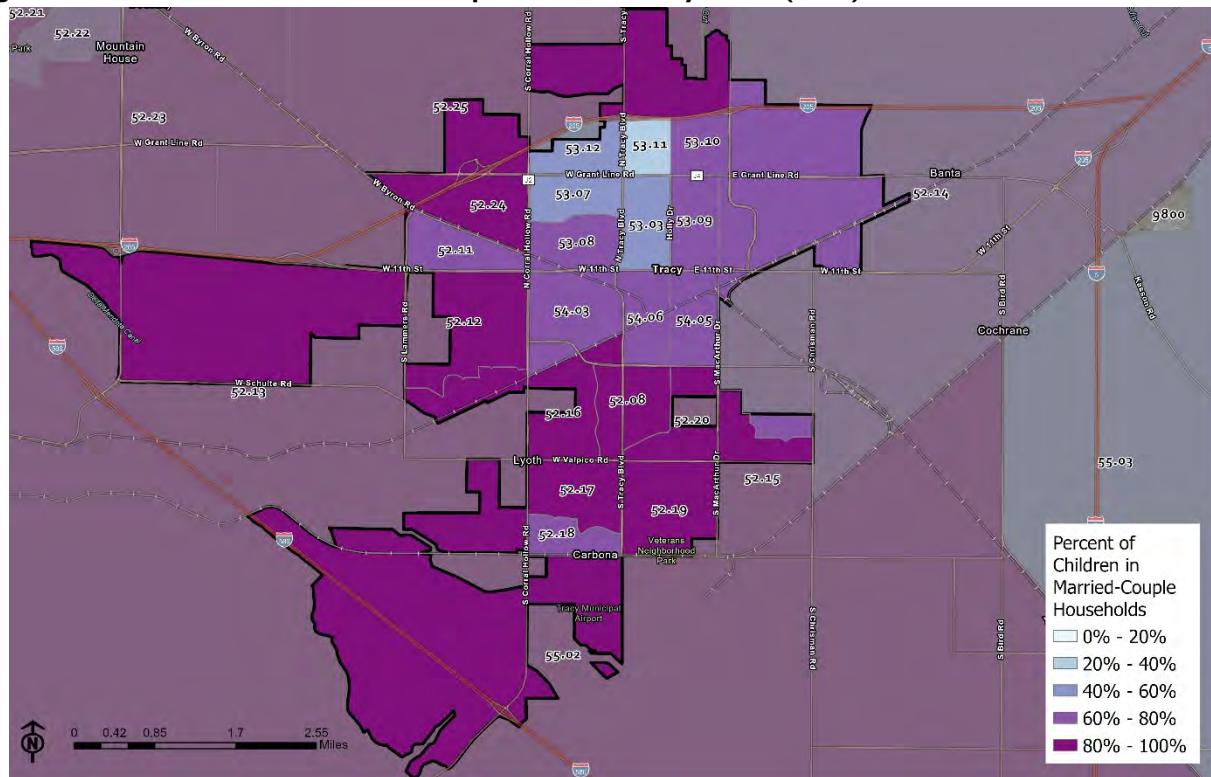
Source: HCD AFFH Data Viewer

Figure C-16+5: Female Headed Households Comparison of RHNA Units

As shown in [Figure C-17](#)[Figure C-16](#), there is little variation in Tracy of areas with high concentrations of children in married-couple households. There is a slightly smaller concentration in the downtown area. In Tracy, 42.4 percent of households are married couple households with children present, compared to 33.3 percent countywide. RHNA pending and opportunity sites are distributed throughout the City and are not expected to impact fair housing concerns based on familial status.

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Figure C-1746: Children in Married-Couple Households by Tract (2021)



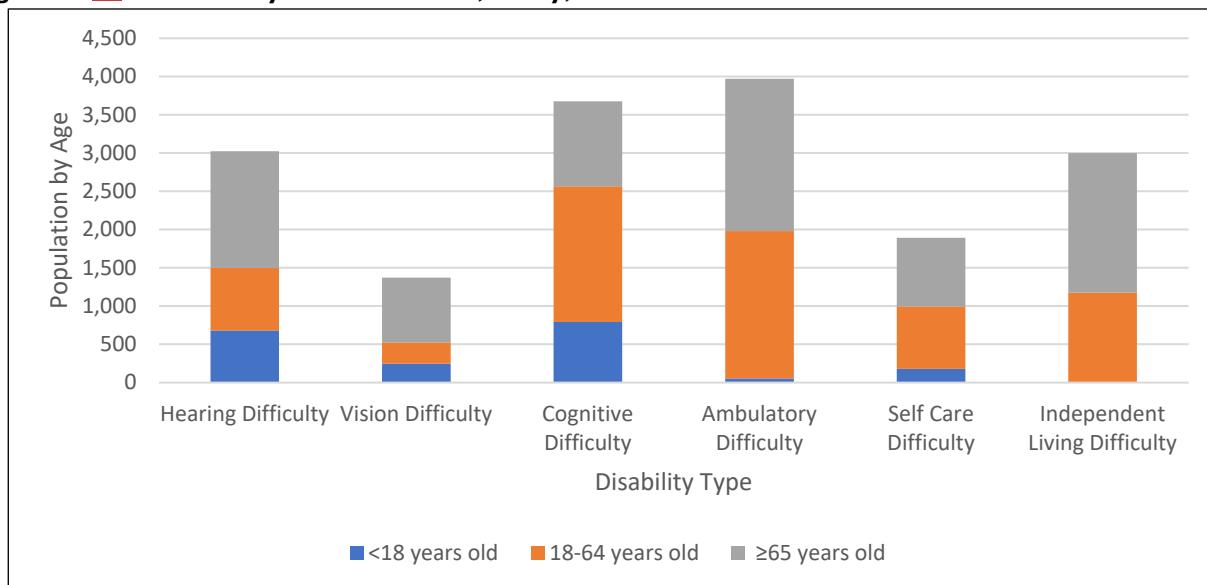
The types of disabilities included in the Census are:

- Hearing difficulty: deaf or has serious difficulty hearing
- Vision difficulty: blind or has serious difficulty seeing even with glasses
- Cognitive difficulty: has serious difficulty concentrating, remembering, or making decisions
- Ambulatory difficulty: has serious difficulty walking or climbing stairs
- Self-care difficulty: has difficulty dressing or bathing
- Independent living difficulty: has difficulty doing errands alone, such as visiting a doctor's office or shopping

Figure C-18 shows an estimate of the number of Tracy residents with disabilities by type of disability and age group. The most prevalent types of disability are ambulatory and cognitive difficulties. Note that individuals may have more than one type of disability.

Ambulatory issues are the highest reported disability countywide. A large population with walking difficulty creates a need for single-story housing, elevators, transit access, wheelchair access, larger homes or ADUs for live-in help, and proximity to health facilities. The City has included Program 12: Accessory Dwelling Units, to provide for additional housing options in higher-income areas of the City. The program includes informative sheets and brochures, and development of incentives to increase the production of ADUs include financial assistance with construction, pre-approved plans, and technical assistance.

Figure C-18: Disability Characteristics, Tracy, 2021



Source: 2021 ACS S1810.

Figure C-19 shows the disabled population is relatively evenly distributed throughout Tracy. There were no significant changes in location or concentration of those with a disability from 2010-2014 to 2017-2021. There is no area of the City with an extreme concentration of persons with disabilities. The central downtown area does have a slightly larger disabled population, though the difference is minimal. A larger or more concentrated disabled population may indicate a greater need for access to health care. However, health care facilities are also more concentrated in the central downtown area.

Residents of Tracy utilize the Valley Mountain Regional Center (VMRC) located in Stockton. The VMRC provides services for persons with developmental disabilities in Amador, Calaveras, San Joaquin, Stanislaus, and Tuolumne counties.

Housing options for persons with disabilities also include community care facilities. As of November 2022, the City of Tracy has:

- Ten Small Adult Residential Care facilities – 55 beds total
- One Adult Day Care facility – 60 clients

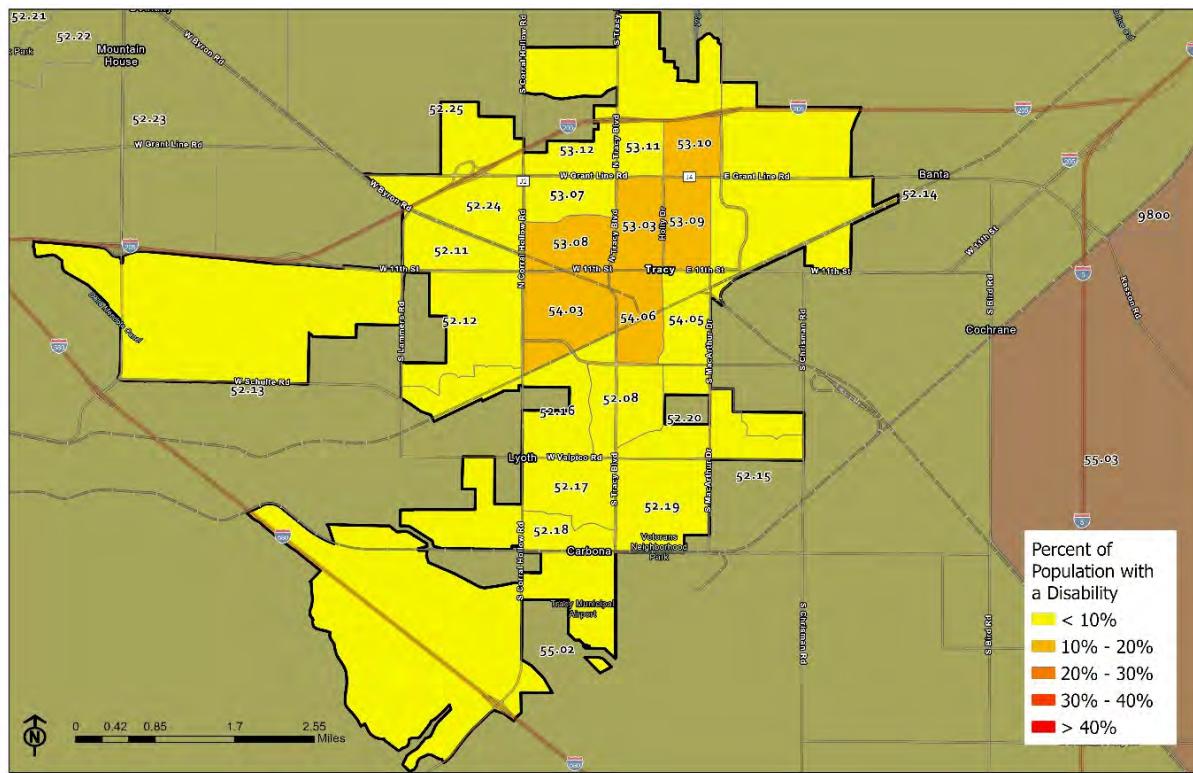
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In addition, VMRC is a private, non-profit corporation that contracts with the State of California to provide diagnostic, evaluation, case management, and early intervention services to people with developmental disabilities. VMRC purchases services such as respite, out-of-home placement, adult day programs, transportation, behavior intervention, infant development services, clinical, and diagnostic services for people with developmental disabilities.

Figure C-20Figure C-19 also shows pending and proposed RHNA Opportunity sites in the context of persons with a disability. As shown in Figure C-20Figure C-19, about 90 percent of the RHNA sites are in areas where less than 10 percent of the population has a disability. The highest percentage of the population with a disability in Tracy is 10 to 20 percent and has about 10 percent of the share of the RHNA units, the rest are located in areas with 0 to 10 percent of the population with a disability. The areas with the 8 percent of RHNA sites include three different areas of the City. The neighborhood to the east predominately consists of large warehouse uses at the fringe of the City and includes the City's largest mobile home park, as well as single family residential. The other neighborhoods are centrally located and consist of a mix of uses, is fully integrated, and includes a portion of downtown Tracy. The City's RHNA strategy is not expected to exacerbate conditions of segregation.

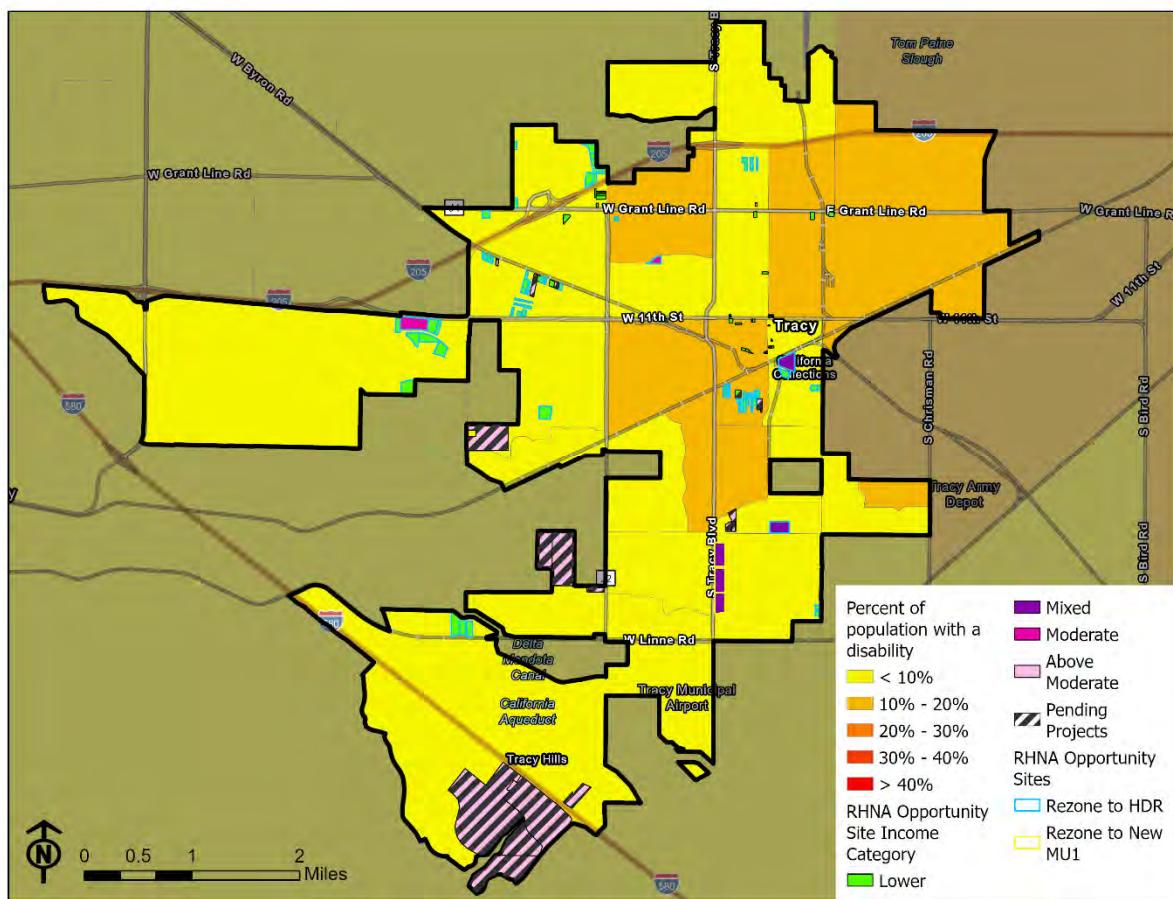
As such, the sites are not expected to cause fair housing concerns as they relate to residents with a disability.

Figure C-19: Population of Persons with Disabilities by Tract (2010-2014)



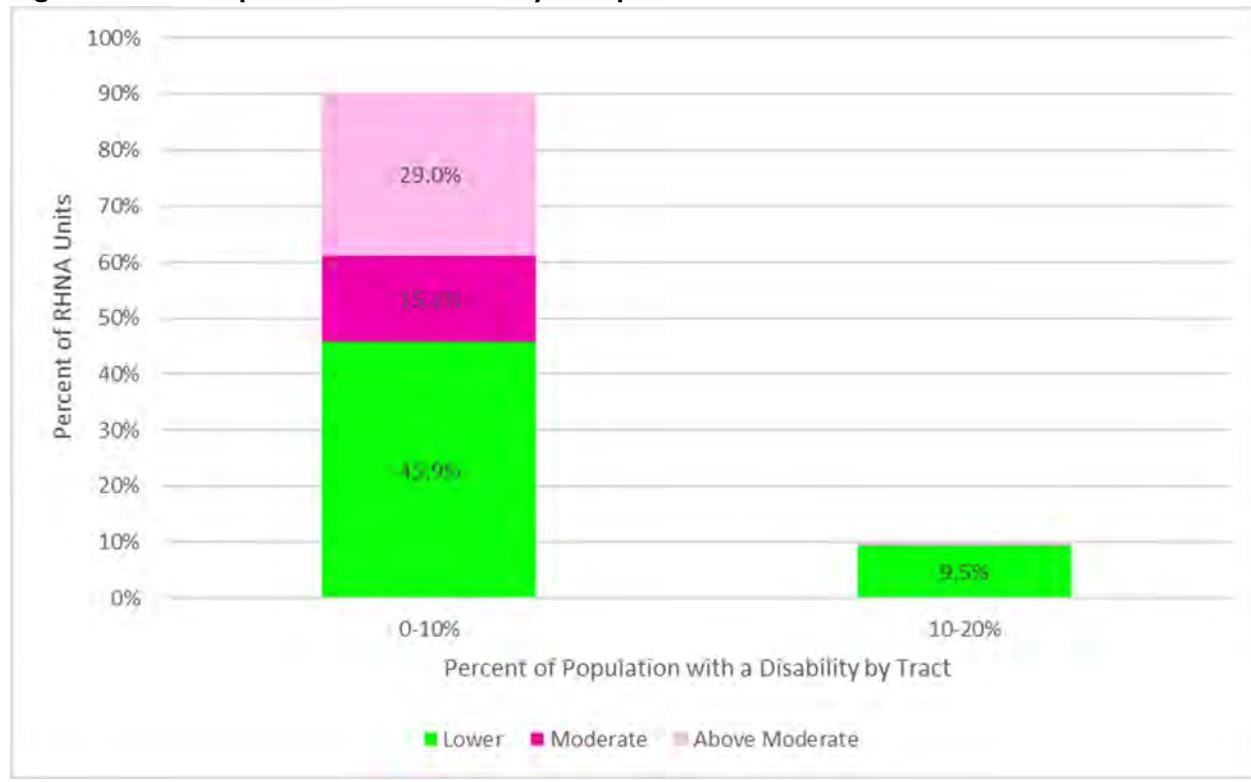
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Figure C-2019: Sites Inventory and Population of Persons with Disabilities by Tract (2017-2021)



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Figure C-2120: Population with a Disability Comparison of RHNA Units



5. Findings

Overall, the City of Tracy has higher concentrations of the non-White and low- to moderate-income residents in the central downtown area of the City. This area is also where the census tracts are primarily in the low or moderate opportunity categories, and where poverty and disability are most prevalent. RHNA sites are distributed throughout the City, without an extreme concentration in the central downtown area. The City is pursuing a number of investments, long-range planning efforts, and improvements in various geographic areas of the City with greater need, specifically downtown Tracy and central areas of the City. Efforts include the Gran Theater repair, pedestrian and bikeway improvements, and park improvements, as well as a 10 Year Economic Development Strategic Plan and Downtown Transit-Oriented Specific Plan.

Much of the western and southern portions of Tracy have been recently developed, or are pending development of specific plans.

The City is including Program 12: Accessory Dwelling Units, to provide for additional housing options in higher-income areas of the City. The program includes informative sheets and brochures, and development of incentives to increase the production of ADUs include financial assistance with construction, pre-approved plans, and technical assistance.

D. Racially and Ethnically Concentrated Areas of Poverty and Affluence

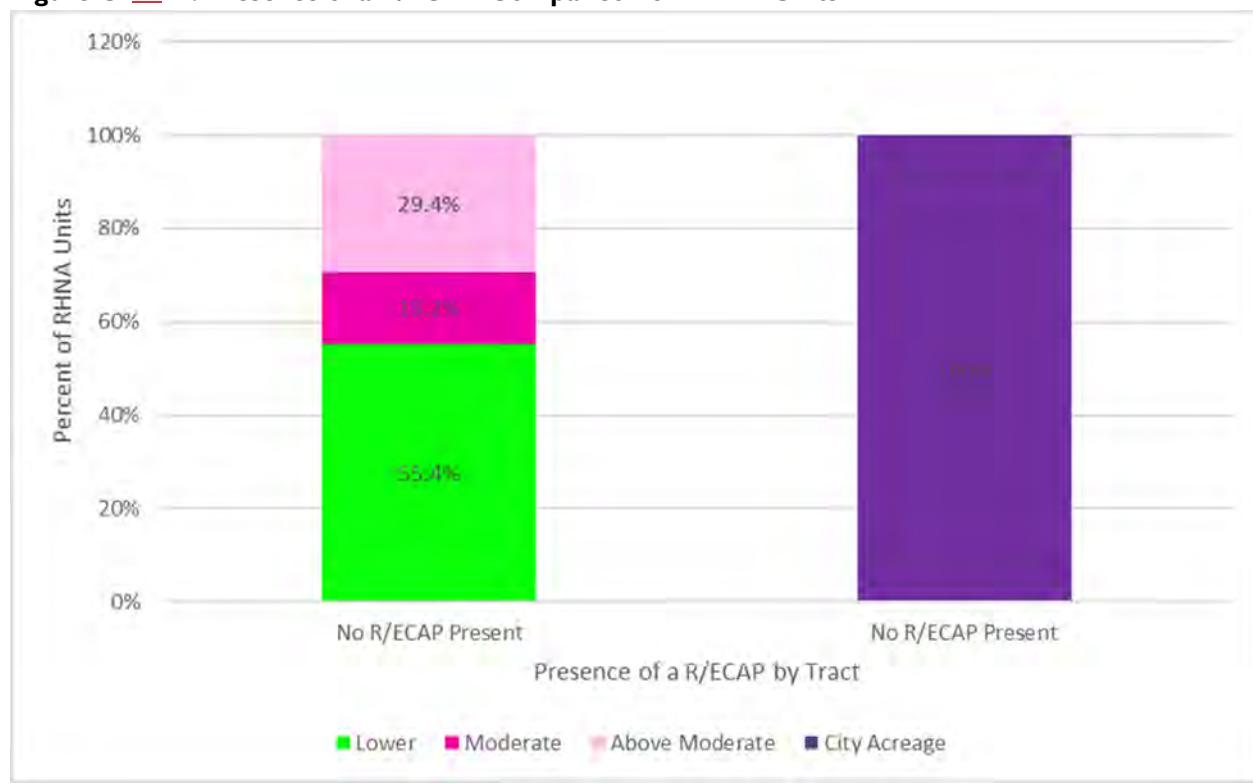
1. R/ECAPs

HUD defines Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) as areas where the percentage of the population that is non-White is over 50 percent and the percentage of households with incomes below the poverty line is over 40 percent. Alternatively, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average census tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

As shown in [Figure C-22](#)[Figure C-21](#), there are no R/ECAPs in the City of Tracy per HCD's AFFH Data Viewer Tool. The closest R/ECAP to Tracy is in the City of Stockton, about 20 miles northeast of the City.

There are no RHNA sites that are in R/ECAPs and the site selections will not create conditions that lead to a R/ECAP.

Figure C-22[Figure C-21](#): Presence of a R/ECAP Comparison of RHNA Units



2. Racially Concentrated Areas of Affluence

HUD defines Racially Concentrated Areas of Affluence (RCAs) as areas where the percentage of the population in a tract that is White is over 1.25 times the average percentage of the population that is White in the given Council of Governments (COG) region and median income is 1.5 times higher than the COG or State AMI, whichever is lower.

The City of Tracy has an RCAA area in the southern tip of the City. The southern census tracts have more open space and agriculture, as well as an airport, so the population as a whole is generally less concentrated in these areas, which may skew data perception. However, newer single-family

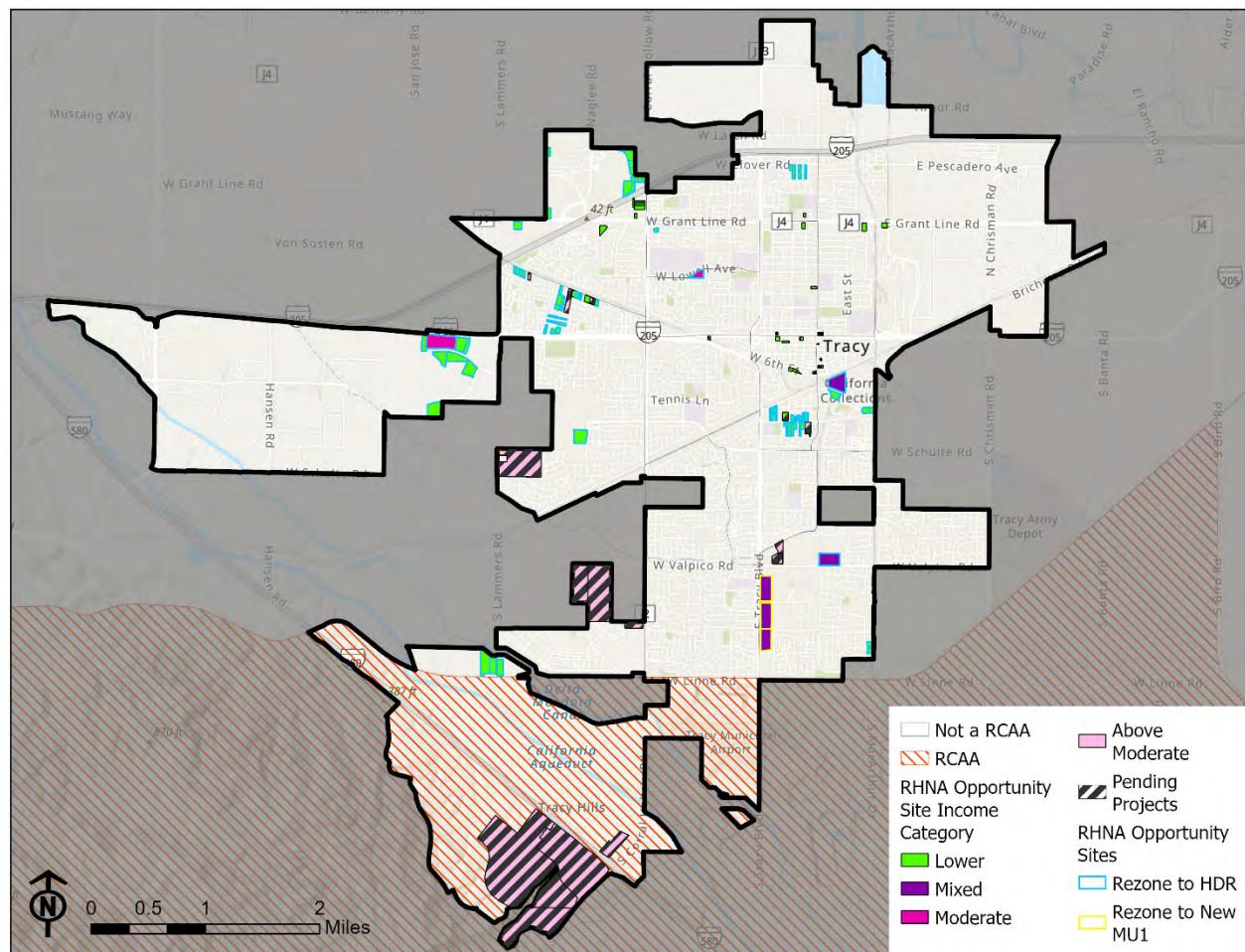
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development is primarily occurring in these areas. Newer large homes are often more expensive than older small homes in the downtown areas, which correlates with higher income households in these newer areas. Additionally, these census tracts have the majority of their acreage outside the City of Tracy, making it likely that the small portion of the tract within the City is not responsible for the overall RCAA designation and that the categorization does not accurately reflect the conditions in the City of Tracy.

Program 7: Affordable/Workforce Housing includes a number of actions to introduce middle income housing in existing single-family neighborhoods and to facilitate the development of medium density multi-family housing.

The City is included Program 12: Accessory Dwelling Units, to provide for additional housing options in higher-income areas of the City. The program includes informative sheets and brochures, and development of incentives to increase the production of ADUs include financial assistance with construction, pre-approved plans, and technical assistance.

Figure C-2322: RCAA Vicinity and RHNA Sites



E. Disparities in Access to Opportunities

1. California Tax Credit Allocation Committee (TCAC)

One tool that can be used to analyze disparities in access to opportunities is the California Tax Credit Allocation Committee's (TCAC) Opportunity Area scores. These were prepared by a task force commissioned by TCAC and HCD to identify areas statewide whose economic, educational, and environmental characteristics support positive outcomes for low-income families. The map is updated annually. Opportunity maps are made for three domains: economic, environmental, and education. Each map uses categorical indicators to determine its individual score. A composite score and resource designation combining all three designations is then assigned to each block group.

To determine the final resource category, the top 20 percent of overall scores in a county are labeled as highest resource and the next 20 percent of scores are labeled as high resource. Then, any area that is considered segregated and that has at least 30 percent of the population living below the federal poverty line is labeled as an area of High Segregation and Poverty. Any remaining uncategorized areas in the County are evenly divided between moderate resource and low resource areas. The rationale and metric for each indicator is described in more detail in current guidance documents for the California TCAC program.³ Additional information regarding these indicators in Tracy are provided on the following pages.

Economic Indicators

TCAC economic scores for the City by tract are presented in [Figure C-24](#)~~Figure C-23~~. TCAC economic scores are based on the following variables: poverty, adult education, employment, job proximity, and median home value. Most of Tracy has more positive economic scores (0.5 - 0.99). The less positive scoring area includes part of the downtown core, the Sutter Tracy Community Hospital, and some commercial and residential uses throughout. The more positive scoring areas are located largely at the edges of the City and include the regional shopping center and several companies and federal agencies that support the global supply chain. The City trends higher in scores due to the proximity of these types of companies and agencies.

In September 2023, the City adopted a Ten-Year Economic Development Strategic Plan to help the City focus implementation efforts on strategic economic development priorities. The strategic plan identified and prioritized eight key areas as opportunity sites. The top priority identified is the downtown area, the second is the west side, and the third is commercial corridors in the center of the City. The downtown area and commercial corridors have lower economic TCAC scores. The strategic plan helps support growth in these areas and makes recommendations to enhance economic resilience, expand market access, encourage investment, improve quality of life, and improve infrastructure in these areas.

According to local knowledge, the major employers in Tracy include Logistics, Leprino Foods, Amazon warehouses, Medline, Pacific Medical research and development, and the hospital and healthcare industry. Other major employers include schools and teachers, and distribution based jobs and trucking. In recent years, there has been an increase in the distribution industry, with 6 Amazon warehouses, however most industry is warehouse based, and there is very little commercial growth. There was a large boom in the service commercial industry in 2000, when the population

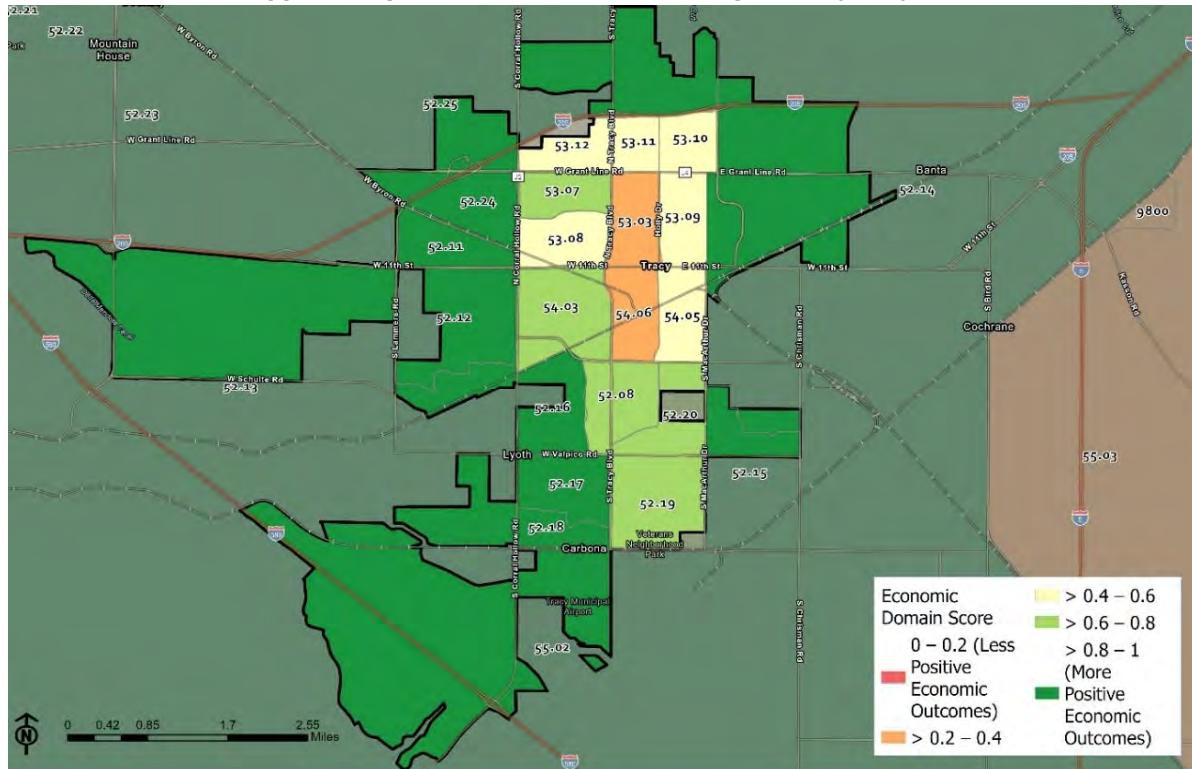
³ <https://www.treasurer.ca.gov/ctcac/opportunity/2022/2022-hcd-methodology.pdf>

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reached a size that could sustain most major restaurant chains and car washes, but there remains to be very little retail commercial uses.

Workers in Tracy commonly do not live in Tracy, and the VMT threshold is affected by warehouse workers coming in from Stockton, Elk Grove, and Merced. The transportation master plan includes VMT banking and fees towards improvements in order to lower VMT.

Figure C-2423: TCAC Opportunity Areas – Economic Score by Tract (2021)



Education Indicators

Education indicators include math and reading proficiencies of fourth graders, high school graduation rates, and the student poverty rate. Most of Tracy is served by the Tracy Joint Unified School District, which includes 7 elementary schools, 2 middle schools, 5 high schools, and 4 K-8 schools. Portions of the City are also served by Jefferson School District south of Valpico Road and by the Lammersville Unified School District in the northwest portion of the City. According to Great Schools, 53 percent of schools in the district are rated below average, 37 percent are rated average, and 11 percent are rated above average.⁴

As shown in [Figure C-25](#)~~[Figure C-24](#)~~, most of the City has more positive education scores, largely at the edges of the City. Although many of these areas include single family residential most of the positive score areas in the east and west are either agricultural land or industrial uses which can skew the results. A majority of the central areas of the City have less positive education scores.

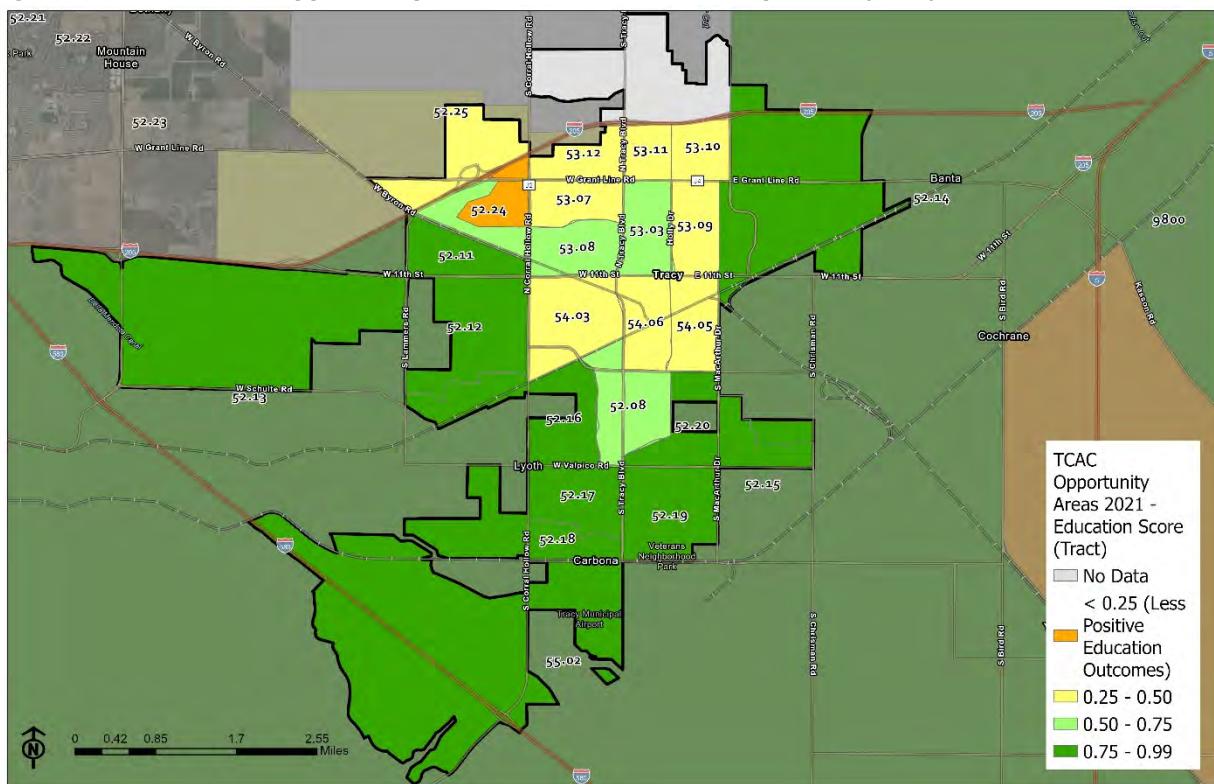
⁴ Great Schools Tracy Unified District Summary. <https://www.greatschools.org/california/tracy/tracy-joint-unified-school-district/>

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According to local knowledge provided by City staff, there is no notable discrepancies in the performance of local schools. At a regional level, Tracy's schools perform well. Residents in Tracy Hills primarily attend the Jefferson school district. The west side of the City is historically highly educated Silicon Valley commuters. There is an opportunity to school choice within the City. However, since the schools are of comparable quality, school choice is technically driven by available magnet programs.

The City of Tracy and the School Districts participate in the City/Schools Liaison Committee comprised of two seated Tracy City Council Members. This committee meets every other month with School District officials to discuss issues of mutual concern, including school pedestrian routes, bus routes, facilities, and crossing guards. Discussions then help staff in applying for grant funding and any prioritizing capital improvement projects to close infrastructure gaps.

Figure C-2524: TCAC Opportunity Areas – Education Score by Tract (2021)



Environmental Indicators

The TCAC Environmental Score domain utilizes CalEnviroScreen 3.0 pollution indicators and values, however similar the CalEnviroScreen 4.0 scores (see [Figure C-31](#)[Figure C-30](#)) are based on percentiles and show trends similar to the TCAC environmental score map. TCAC Environmental Scores range from 0 to 1, where higher scores indicate a more positive environmental outcome (better environmental quality). As shown in [Figure C-26](#)[Figure C-25](#), the scores are the inverse of the economic indicators, where the central areas of the City score more positive than the outlying areas. This is largely due to the location of the various distribution centers located on the edges of the City, specifically in eastern parts of the City. The less positive scores in the southern tracts are due to high exposure to pesticides and high environmental effects including groundwater threats and the presence of hazardous waste.

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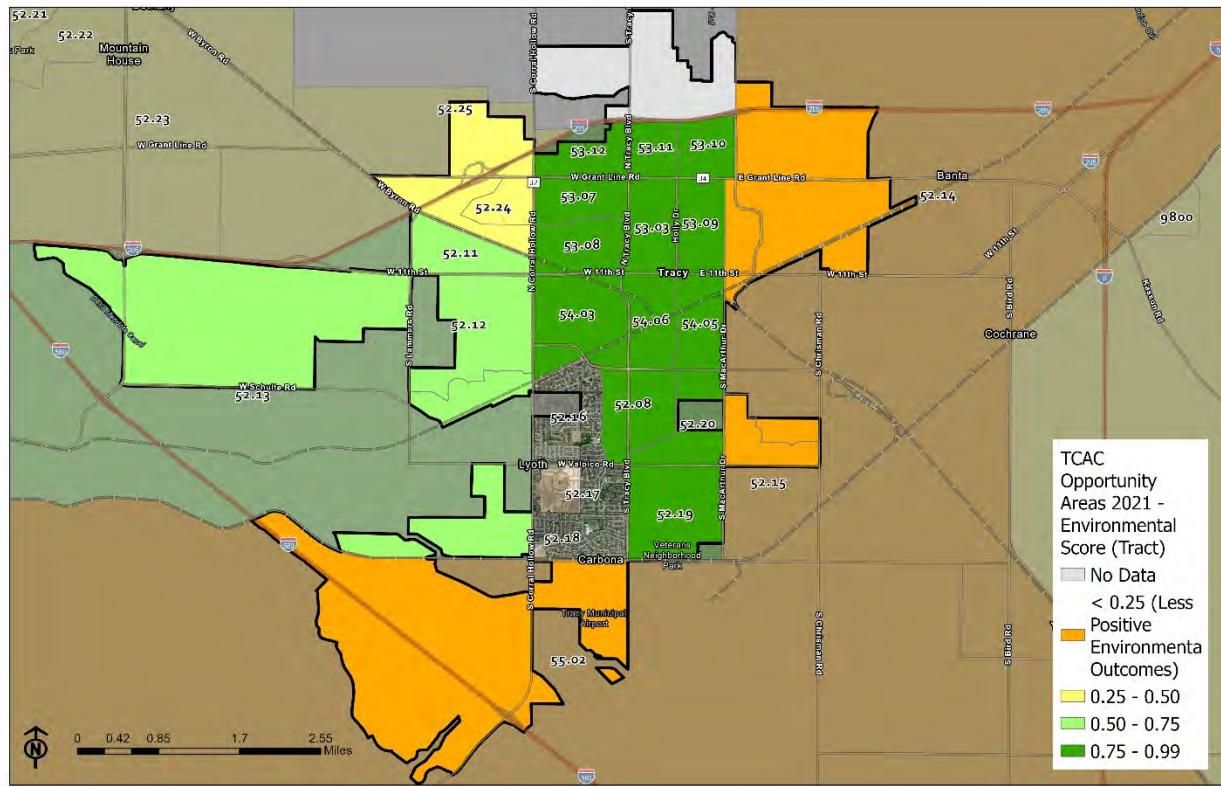
The railroad lines and the surrounding areas in the central area of the City have an existing contamination problem. Most pollution in the City comes from the east bay area and sits in Tracy due to wind and geographic factors. The City is not within a 200 year or 100 year flood zone and there are no areas at anticipated risk of flash floods during storms.

The City of Tracy participates with San Joaquin County in a household hazardous waste program. Tracy residents can also access the permanent household hazardous waste consolidation facility located in Stockton. The County Office of Emergency Services (OES) administers the Emergency Planning and Community Right-to-Know program for the Tracy Planning Area.

The Safety Element of the City's General Plan also includes goals and policies that are designed to reduce the risks associated with hazardous materials and waste in the City. These policies include:

- Requiring developers to conduct the necessary level of environmental investigation to ensure that soils, groundwater and buildings affected by hazardous material releases from prior land uses and lead or asbestos potentially present in building materials, will not have a negative impact on the natural environment or health and safety of future property owners or users.
- Requiring new pipelines and other channels carrying hazardous materials avoid residential areas and other immobile populations to the extent possible.
- Maintaining formally designated hazardous material carrier routes to direct hazardous materials away from populated and other sensitive areas.

Figure C-2625: TCAC Opportunity Areas – Environmental Score by Tract (2021)



TCAC Composite Score

TCAC Opportunity Area scores for Tracy have been compiled by tract and are presented geographically in [Figure C-27](#)[Figure C-26](#). A majority of the tracts in Tracy are either high or highest resource, there are four moderate resource (rapidly changing) tracts and five low resource tracts. Moderate resource tracts are designed to identify areas that may become high resource.

The highest resource tracts are located in the western part of the City and extend beyond City limits and include agricultural land and the regional shopping area near Interstate 205. The other highest resource tracts are located just south of the downtown core and are largely residential. The higher resource tracts include a majority of the industrial area in the northeast and single family residential in the southern and central tracts. The moderate and low resource tracts are all located in central Tracy which includes the downtown and where the biggest mix of land use occurs.

Highest resource areas tend to have smaller populations of people of color while block groups in and around moderate resource tracts tend to have larger populations of people of color (see Figure C-3). The moderate and low resource tracts also have a higher percentage of low- and moderate-income (LMI) households, person in poverty, and children in single-parent female-headed households and TCAC opportunity scores (see Figure C-6, [Figure C-13](#)[Figure C-12](#), and [Figure C-15](#)[Figure C-14](#)). According to local knowledge provided by City staff, disparities between areas of the City may be attributed to recently annexed areas lacking proper infrastructure, water, sewer, or sidewalks. The City is revising the CIP process to close gaps in infrastructure. This includes the Mt Oso condominiums getting infrastructure. The Downtown Vision Plan park of October 2024 utilizes housing related funds to remediate the soil on a contaminated City-owned site with high density housing, and to close the infrastructure gaps in the lower opportunity areas. The City is closing gaps on Corral Hollow Rd, Lammers Rd, Valpico Rd, and gaps between new subdivisions.

The majority of Tracy is designated as either high or highest resource. Approximately [82](#) percent of the RHNAs opportunity sites are located in the high or highest resource areas, meaning about [18](#) percent of the RHNAs opportunity sites are located in low and moderate resource tracts (see [Figure C-32](#)[Figure C-31](#)). [About 42 percent](#) of lower-income RHNAs opportunity sites are located in the high and highest resource opportunity areas. The distribution of the majority of the RHNAs opportunity sites within the high and highest resource areas will not exacerbate any conditions, but rather provide more equitable housing opportunities in high resource areas in Tracy.

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Figure C-2726: Sites Inventory and TCAC Composite Score by Tract (2023)

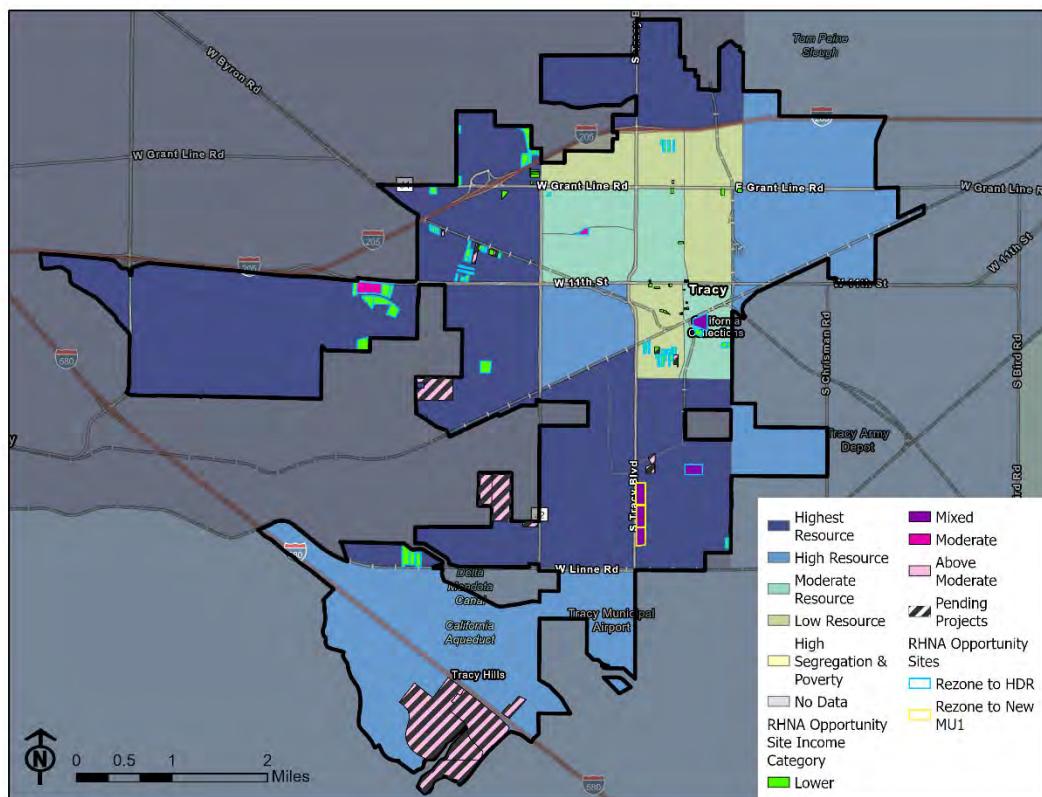
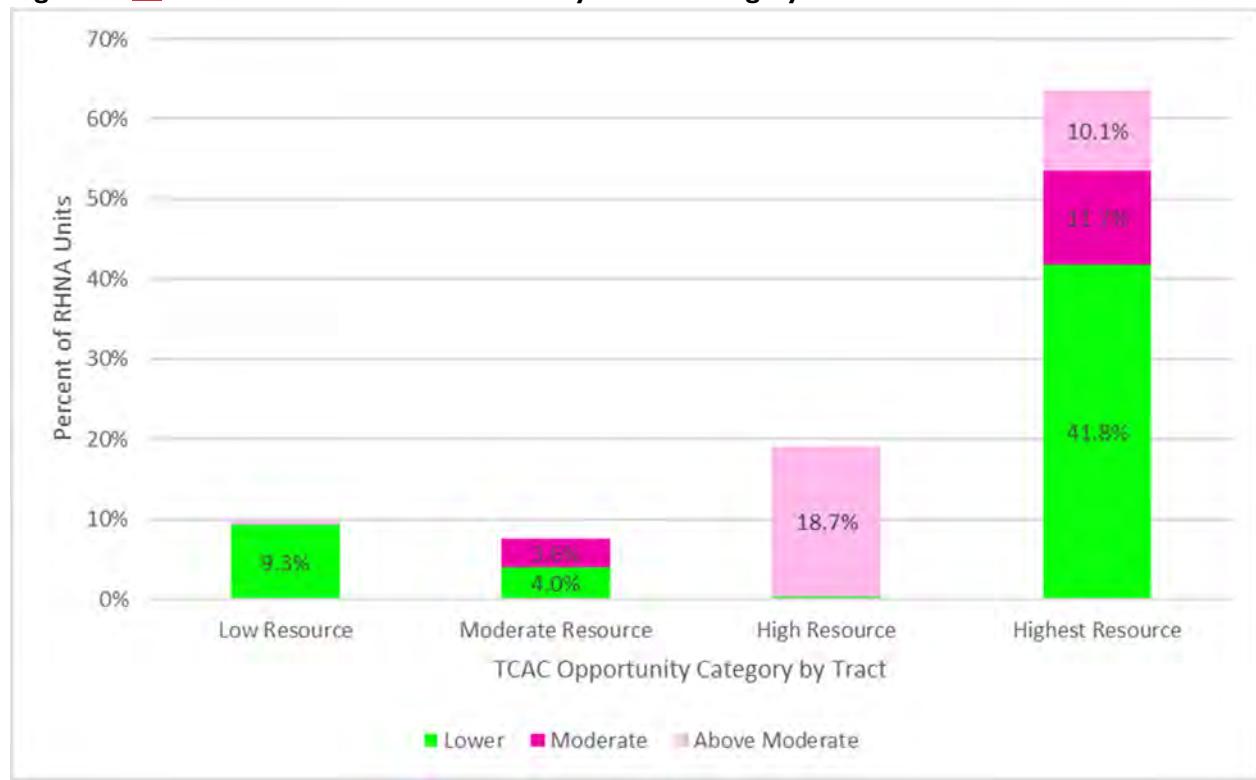


Figure C-2827: Distribution of RHNA Units by TCAC Category



2. Transportation

Access to adequate transportation and a variety of transit options can help illustrate disparities in access to opportunities. The City of Tracy provides a Fixed Route bus service via the TRACER that connects riders to amenities throughout the City (see [Figure C-29](#)[Figure C-28](#)). The City also provides an On-Demand bus service, and a Paratransit Service which is a door to door service available for ADA/Medicare passengers and Tracy residents aged 65 and older.

Connection to neighboring cities in San Joaquin County can be made at the Tracy Transit Station via the San Joaquin Region Transit District (RTD) buses. RTD provides two regional connections from Tracy, Route 150 which connects to the Livermore/Dublin Bay Area Rapid Transit (BART) station and the greater San Francisco Bay Area and Route 90 which connects to Stockton.

The San Joaquin County Transportation planning agency have supported the development of Dibs. Dibs is a program that helps transit users plan routes and connect to different transportation systems.

According to local knowledge, high traffic is concentrated off the I-5 and 11th Street, which is also a high collision corridor. Workers in Tracy commonly do not live in Tracy, and the VMT threshold is affected by warehouse workers coming in from Stockton, Elk Grove, and Merced. The transportation master plan includes VMT banking and fees towards improvements in order to lower VMT.

The Public Works Department maintains all utility reports for the community that identify water supply and quality and any other documents for the public to review and provide information on the infrastructure backbone of the community.

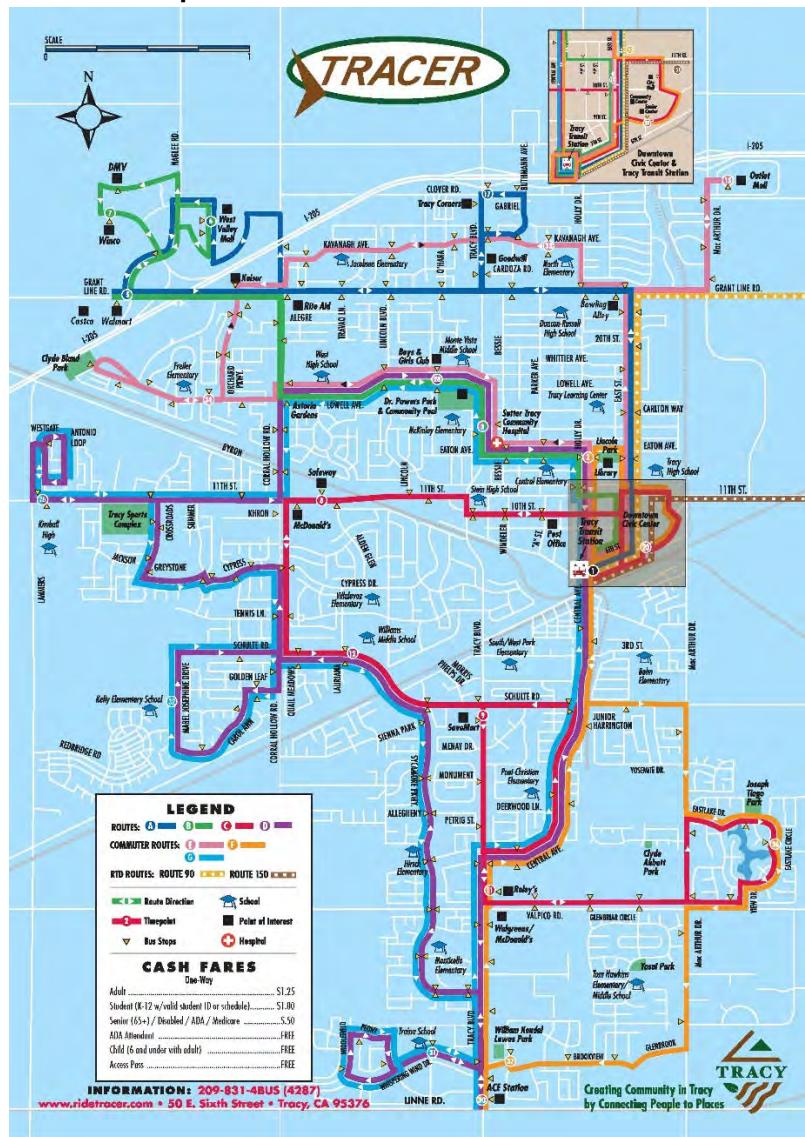
The Traffic Safety Section of the Engineering Division is responsible for improving the traffic flow and roadway safety of City of Tracy. The key responsibilities include:

- Planning the City's roadway network according to the City's Transportation Master Plan.
- Planning and implement the City's traffic signal system, pedestrian access routes and bike lanes.
- Implementing the Citywide Pavement Rehabilitation Program.
- Studying the impacts of Development Projects on the roadway network and ascertain the necessary traffic mitigation measures.
- Conducting annual speed surveys and establish special speed zones.
- Coordinating the traffic investigations for signs, markings, traffic control devices, neighborhood traffic calming and parking issues.

The Section coordinates its efforts with the Regional Metropolitan Planning Organization (MPO) - San Joaquin Association of Governments (SJCOG), and the State Transportation Agency - California Department of Transportation (Caltrans).

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Figure C-2928: Transit Route Map



There is one high quality transit area located in southeast Tracy, as well as a corridor in northeast Tracy with adequate transit access. The area where many of the opportunity sites are located, in northeast Tracy have adequate transit access. A total of 929 RHNA units are located within a half mile from a transit stop (574 lower-income units and 355 moderate-income units) and a total of 206 RHNA units are located within a high quality transit area (82 lower-income units and 124 moderate-income units). These tracts are generally lower opportunity, but have the greatest transit access. The corridor with the greatest transit access also has relatively lower median incomes and higher poverty and overpayment. This may show that despite existing demographics, these areas are a good opportunity for multifamily housing due to the access to transit.

Additionally, active transportation is supported through several regional policies. Measure K is a half-cent tax for transportation projects and funds a wide variety of projects and programs. This policy has been renewed until 2041. The City is included in the San Joaquin Council of Governments Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan (2012), which supports increased bicycle and pedestrian mobility and safety throughout the county. The City also has a newly adopted Parks, Recreation and Trails Master Plan which summarizes the needs for parks,

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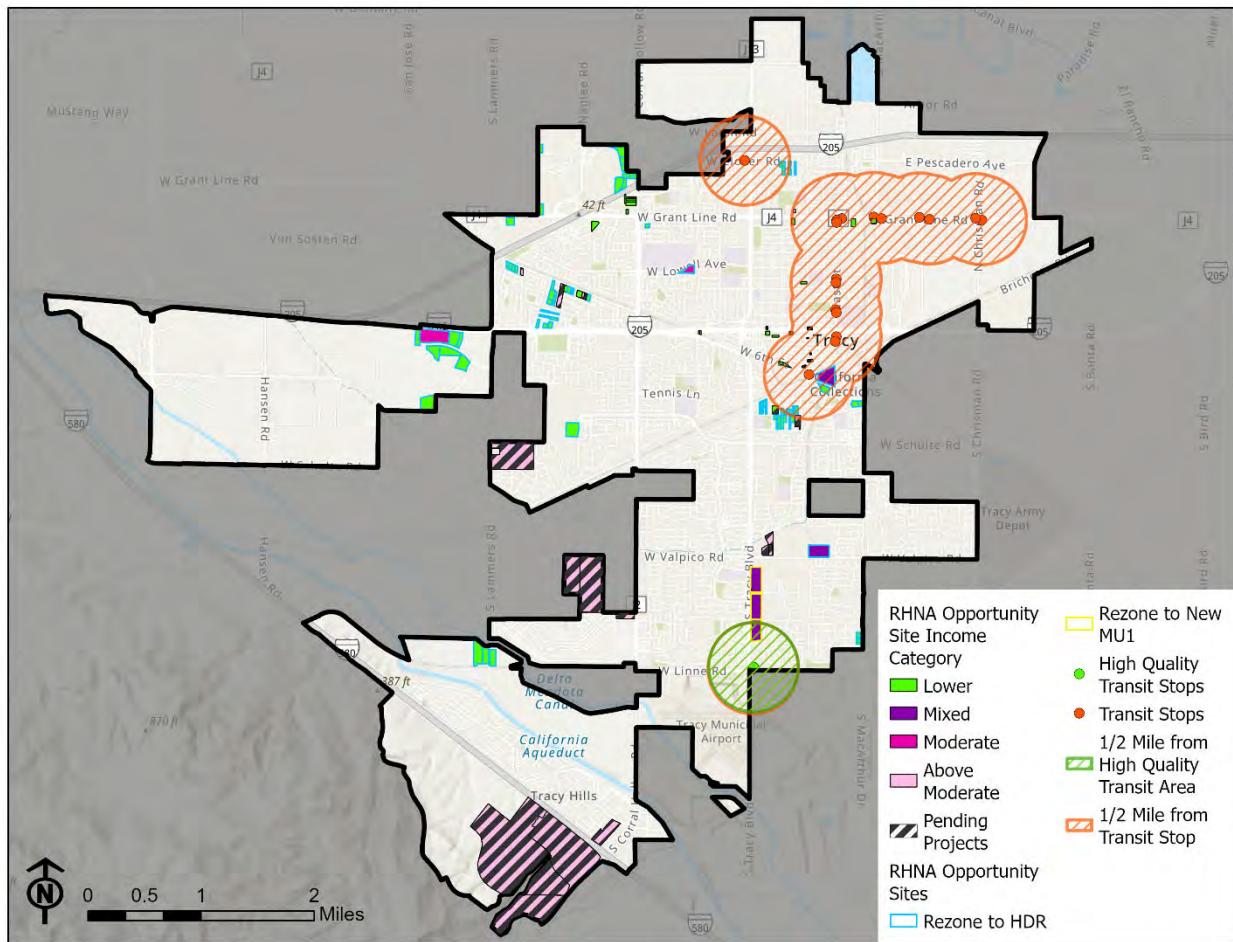
recreation and trails, in new and existing residential areas. Additionally, the City is currently preparing a Downtown TOD Specific Plan will identify the community's vision and establish goals, objectives, and policies for future development as well as identify approaches to implement and fund future development. The City is including Program 18 to facilitate place-based improvements and investment in areas/projects identified in the Active Transportation Plan and Parks, Recreation and Trails Master Plan and Downtown TOD Specific Plan.

The City has multiple projects in its Capital Improvements Plan identified to improve mobility, and active transportation opportunities. The 2023-2024 Capital Improvements Plan includes investment of \$221,382,041 into 104 capital improvement projects, including:

- Holly Drive Pedestrian & Bikeway Improvements: The City is investing 1.83 million dollars to improve pedestrian and bikeway infrastructure in the central area of the City on Holly Drive between 11th Street and Clover Road, including installing a Class 3 bike route, Class 2 bicycle lanes, sidewalk, pavement patching, slurry seal, signage, striping, and pavement markings.
- o Tracy Boulevard Sidewalk. This project will close the missing sidewalk gap to the ACE Train Station parking lot immediately south of the project area. (\$852,465)
- o Valpico Roadway Improvements - Tracy Blvd to MacArthur Drive. This project will involve the roadway widening of Valpico Road from Tracy Blvd to MacArthur Drive, with two lanes in each direction, complete with all necessary improvements like curb, gutter, sidewalk, median, irrigation facilities, landscaping, drainage facilities, street lighting, signage and striping. (\$6,053,140)

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Figure C-3029: High Quality Transit Stops



3. CalEnviroScreen 4.0

The California Office of Environmental Health Hazard Assessment (OEHA) compiles data to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposures, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma and low birth weight infants), CalEnviroScreen also take into consideration socioeconomic factors. These factors include education attainment, linguistic isolation, poverty, and unemployment.

CalEnviroScreen 4.0 percentile scores follow trends similar to TCAC environmental scores (see [Figure C-26](#)[Figure C-25](#)). The western and southern areas of the City have the lowest (best) CalEnviroScreen 4.0 percentile scores in the City. Scores get progressively worse towards the northeastern side of the City largely due to factors discussed in the environmental indicators section (large presence of distribution centers).

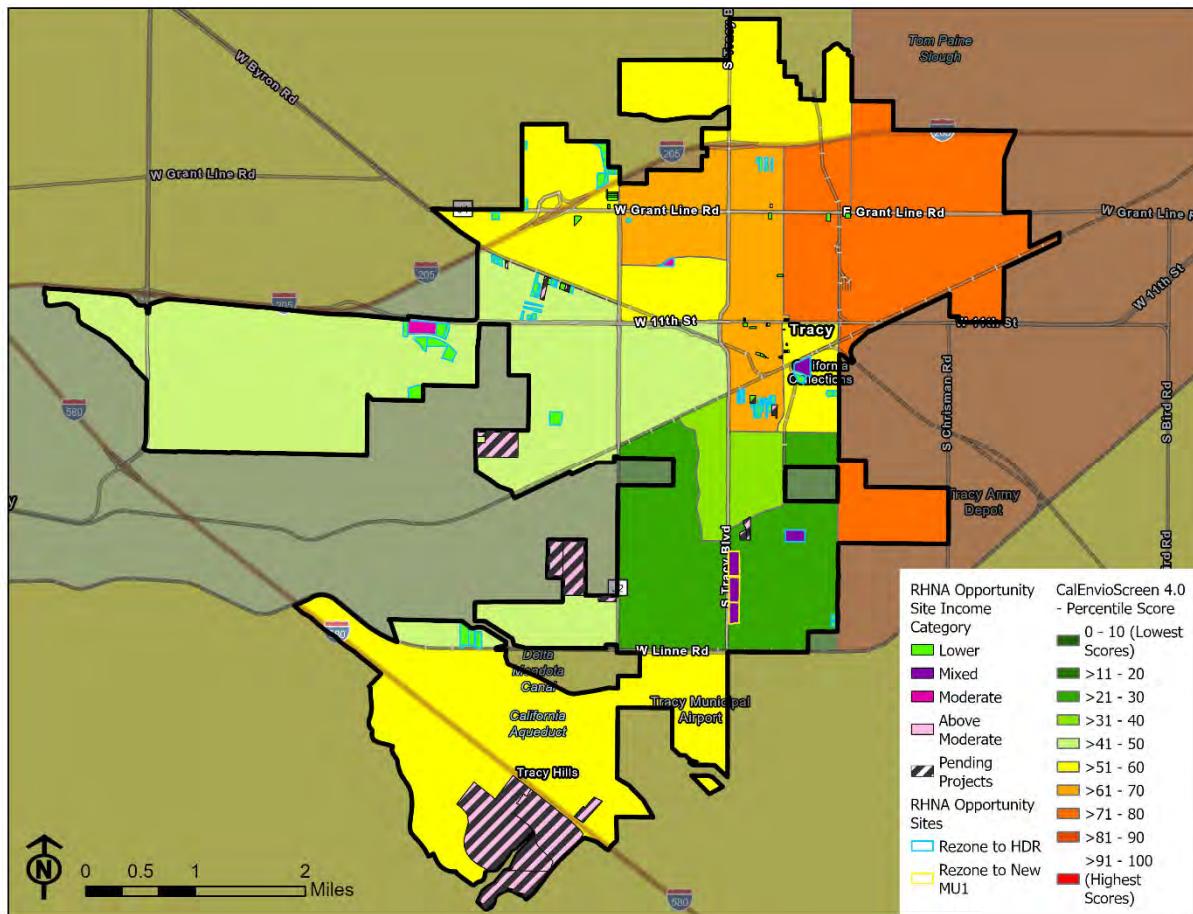
[Figure C-31](#)[Figure C-30](#) and [Figure C-32](#)[Figure C-31](#) shows the distribution of RHNA units by CalEnviroScreen 4.0 percentile scores. As discussed previously, the northeastern sections of the City have higher (worse) scores compared to the central and western areas of the City. The largest percent of the RHNA units are located within the [40-50](#) percentile range ([approximately 40%](#)), with another [about 50](#) percent of units located in the [20-30](#) and [50-60](#) percentile groups. Lower-income RHNA

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units are spread across the CES score percentile groups. Less than one percent of the RHNA units are located in the 70-80 percentile range. Areas where CalEnviroScreen 4.0 scores are the lowest in predominately single-family residential neighborhoods where there is a higher concentration of above moderate income units. Multifamily zoning districts and sites that can accommodate higher density housing, including lower income units, tend to be more concentrated in the central and western areas of Tracy.

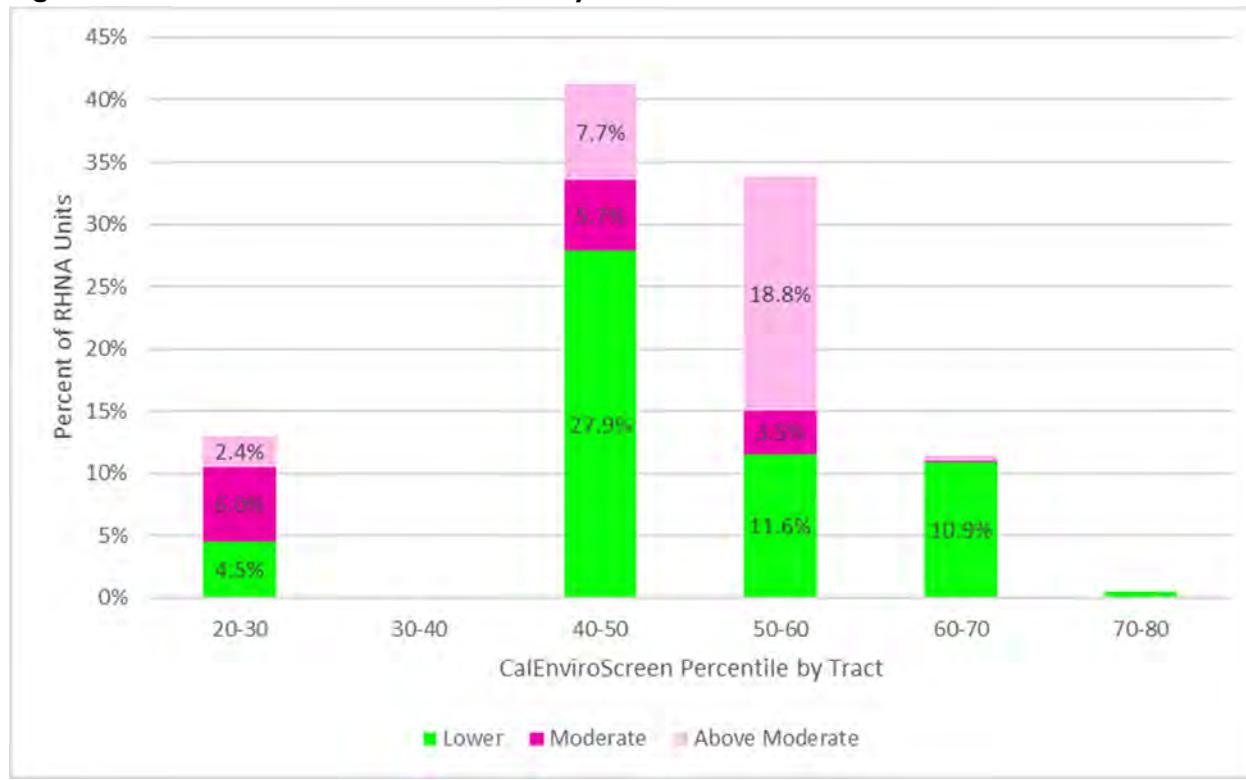
According to local knowledge, the railroad lines and the surrounding areas in the central area of the City have an existing contamination problem. Most pollution in the City comes from the east bay area and sits in Tracy due to wind and geographic factors. The City is not within a 200 year or 100 year flood zone and there are no areas at anticipated risk of flash floods during storms.

Figure C-3130: Sites Inventory and CalEnviroScreen 4.0 Percentile Score by Tract



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Figure C-32: Distribution of RHNA Units by CalEnviroScreen 4.0 Percentile Score



4. Findings

Overall, the City of Tracy has largely high and higher resource tracts and higher scores in opportunity metrics compared to the County as a whole. As such, many of the RHNA sites are located in high resource tracts (see [Figure C-27](#)[Figure C-26](#)). As stated previously, TCAC and CalEnviroScreen 4.0 scores are the highest in predominantly single-family residential neighborhoods where there is a higher concentration of above moderate income units. Multifamily zoning districts and sites that can accommodate higher density housing, including lower income units, tend to be more concentrated in the central and western areas of the City. The lower-income opportunity sites are evenly distributed among the range of CES 4.0 categories. As shown in [Figure C-32](#)[Figure C-31](#), there are more lower-income units than there are above-moderate units in the best (lowest score) CES 4.0 score areas.

Program 7 includes actions to expand housing choices in the community, including in higher resources areas, such as tiny home, duplex, triplex, fourplex, and medium density multi-family housing. The City is pursuing a number of investments, long-range planning efforts, and improvements in various geographic areas of the City with greater need, specifically downtown Tracy and central areas of the City. Efforts include the Gran Theater repair, pedestrian and bikeway improvements, and park improvements, as well as a 10 Year Economic Development Strategic Plan and Downtown Transit-Oriented Specific Plan.

F. Disproportionate Housing Needs

1. Substandard Housing

The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, overcrowding, and substandard housing. The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in San Joaquin County. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income; Overcrowded conditions (housing units with more than one person per room); and
- Units with physical defects (lacking complete kitchen or bathroom)

According to CHAS data based on the 2015-2019 ACS, approximately 86 percent of San Joaquin County households experience housing problems, compared to 83 percent of households in Tracy. In both the County and City, renters are more likely to be affected by housing problems than owners.

Large and elderly households are also often more likely to experience housing problems. A large household is a household with three or more children but is also often calculated as a household with five or more people. An elderly household is calculated as any household with a person over 62 years of age. The Section 8 Housing Choice Voucher program extends assistance to large households with overcrowding and cost burden issues.

Local knowledge indicated that the area near Clover Road and Kavanaugh Avenue where there is an old mobile home park receives a high proportion of code enforcement cases and is likely in need of rehabilitation or replacement. A new multigenerational facility, with shelter provided, is being constructed within the City, with development anticipated to be complete in 2026.

The County's HUD Grant provide housing rehabilitation assistance through the Home Improvement Partnership Grant Program (HOME). Select projects included the following

- 3075 Dovenshire Drive \$15,643.00 Single Family Home Rehabilitation - roofing project
- 344 W. Beverly Place \$22,592.00 Single Family Home Rehabilitation -roofing project
- 2710 Cabrillo Drive \$7,154.00 Single Family Home Rehabilitation- fire damage repair
- 344 W. Beverly Place \$4,700.00 Single Family Home Rehabilitation plumbing connection repair
- 2710 Cabrillo Drive pending Single Family Home Rehabilitation- electrical repairs, flooring, windows, plumbing repairs to kitchen and bathroom

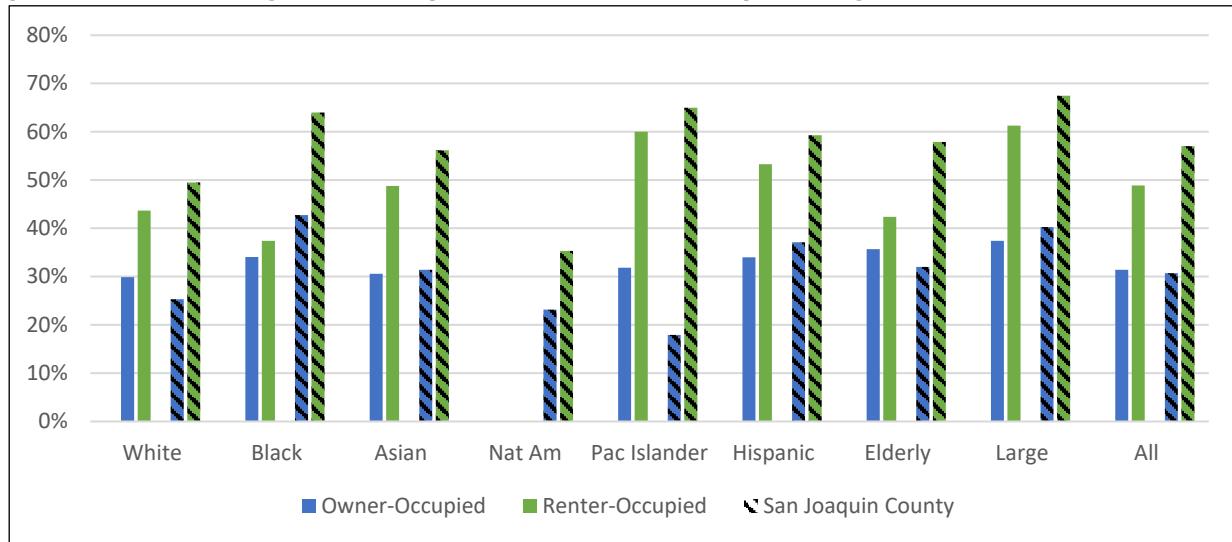
In 2022, the City allocated \$180,173 in Home Investment Partnership Program funds to the San Joaquin County Housing Authority to support the demolition and reconstruction of a 72-unit low-income, senior housing project.

Housing problems by race and ethnicity and by large and elderly households for Tracy and San Joaquin County is shown in Figure C-33~~Figure C-32~~. Overall, there is relative parity of the percentage of households with housing problems by race among home owners in Tracy (30-37%). There is a greater range of household problems among renters in Tracy (38-60%), but similar to the

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patterns in the County. Hispanic and Pacific Islander renters experience housing problems at the highest rate in Tracy, around 53 and 60 percent respectively and is similar when compared to the County 59 percent (Hispanic) and 65 percent (Pacific Islander). Rates of housing problems for Whites and Asians are also comparable between the City and County. In 2019, there was no Native American population in the City, which indicated why [Figure C-33](#)[Figure C-32](#) reads that 0 percent of that population group experiences housing problems.

Figure C-33: Housing Problems by Tenure and Race/Elderly/Housing Size



Source: HUD CHAS Data, 2019

Code enforcement officials noted that in 2023, Tracy Code Enforcement investigated 88 cases associated with encampments, with a concentration in El Pescadero Park. There was no noted concentration of substandard housing identified by code enforcement. Generally, areas with older housing stock and lower median incomes experience overcrowding and substandard conditions at a higher rate.

Code enforcement data noted the following cases of substandard housing in 2023.

- 5 cases of grow houses with numerous electrical, mechanical and plumbing violations that are therefore unlivable;
- 12 cases of hazardous conditions;
- 10 infestation cases – mostly rats and some roaches;
- 4 cases of no heat and/or water; and-
- 1 leaky roof with dry rot.

Cases of substandard housing were distributed throughout the City without clear pattern, with the exception of 3 cases in the same apartment complex on Eaton Avenue. Eaton Avenue is in northern Tracy where it is lower resource and has lower average incomes.

Households paying 30 percent or more of their income in housing costs (i.e., rent, mortgage, or utilities) are considered cost burdened and households paying 50 percent or more on their income are considered severely cost burdened. Large households have more costs to support more people and may experience cost burden or a lack of excess funds to amend housing problems. Elderly

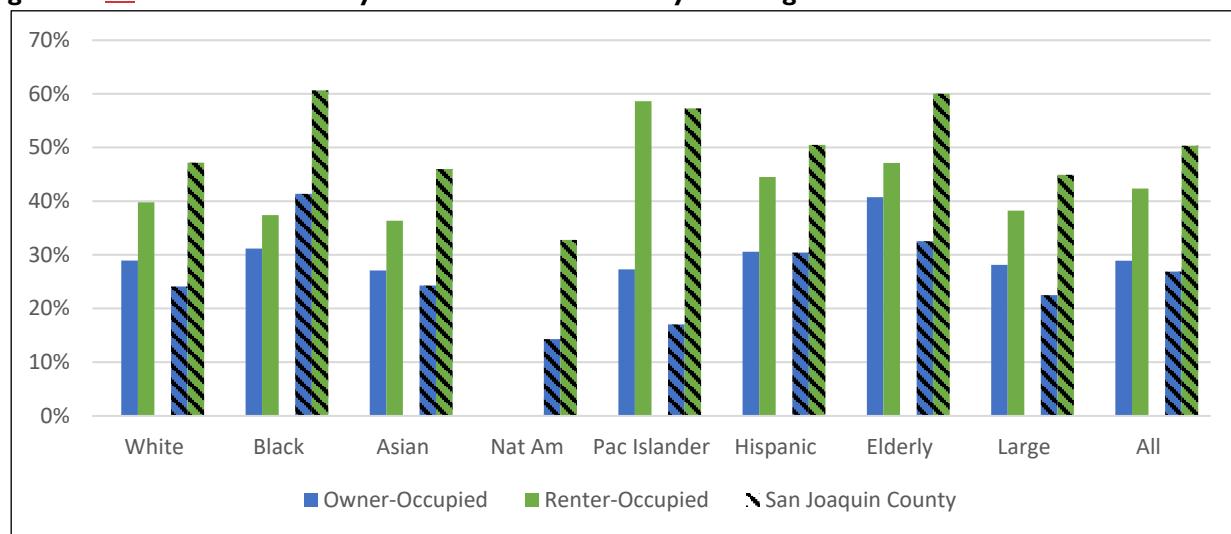
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households may be on a fixed income, which affects excess funds necessary for maintenance in an older home bought before retirement.

Cost burden by race and ethnicity and by large and elderly households for Tracy and San Joaquin County is shown in [Figure C-34](#)[Figure C-33](#). As mentioned above, renter-occupied households are more likely to experience housing problems and cost burden. About 42 percent of renter-occupied households in the City experience cost burden compared to only 29 percent of owner-occupied households. The percentage of City households experiencing burdens is lower than the same cohort in the County for all categories of renters and most categories of owners.

Local knowledge provided by City staff indicated that there have been recent increases in rent and sales prices across every subdivision in the region. As a result, people previously living in cities like Pleasantville or Dublin are now moving to Tracy, and the former Tracy population is moving to cities like Modesto, Turlock, and Lathrop.

Figure C-34[Figure C-33](#): Cost Burden by Tenure and Race/Elderly/Housing Size



Source: HUD CHAS Data, 2019

Cost burdened owners by tract are compared using the 2010-2014 and 2017-2021 ACS data in [Figure C-35](#)[Figure C-34](#) and [Figure C-36](#)[Figure C-35](#). The proportion of cost burdened renters and owners has varied from tract to tract during this period. The proportion of cost burdened owners has increased in several tracts along the northern boundary and decreased in tracts in the southern and central area of the City. As seen in [Figure C-37](#)[Figure C-36](#) and [Figure C-38](#)[Figure C-37](#) proportion of cost burdened renters has increased in the southernmost tract, but most significantly in the northwest while decreasing in the westernmost tract and two tracts in central Tracy. There is one owner-and renter-occupied tract where 60-80 percent of households are cost burdened, all other tracts have <60 percent of households that are cost burdened.

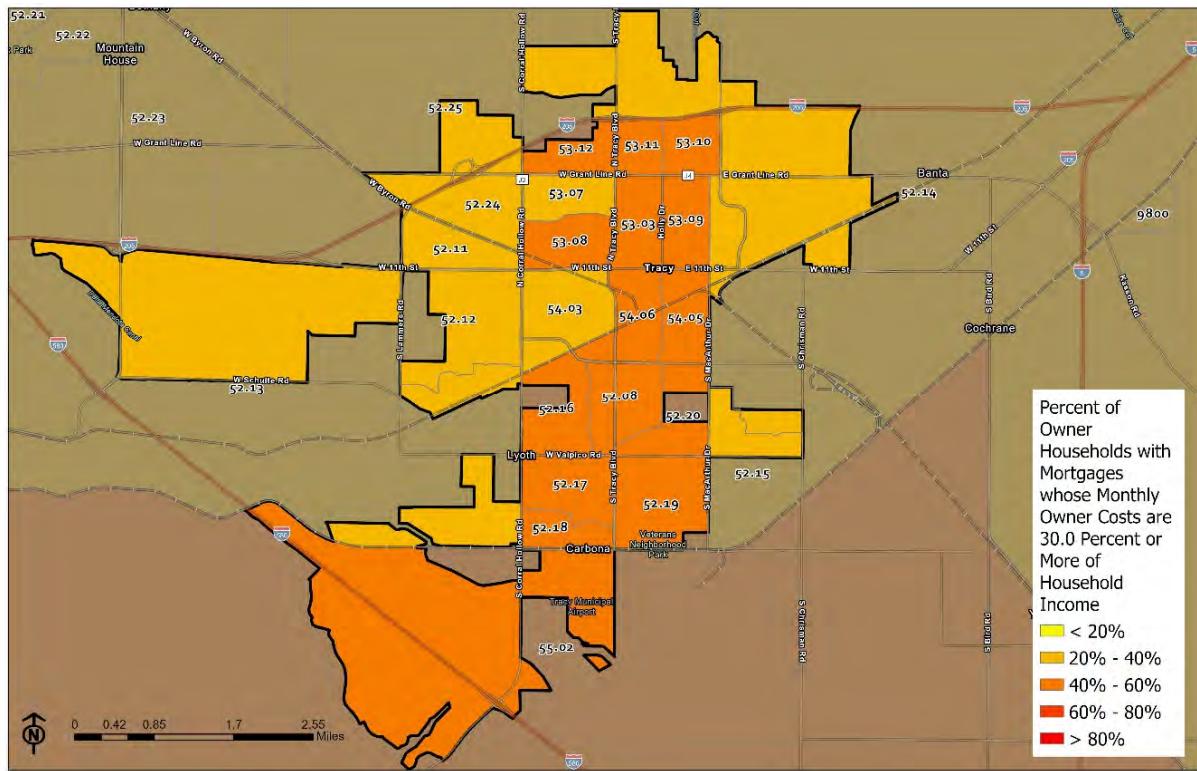
The highest percentage of cost burdened owner-occupied households is 60 to 80 percent and located in a residential neighborhood in the northern part of Tracy. This neighborhood has a mix of residential housing including assisted living facilities, single family, multifamily, and mobile home parks. It also contains a pocket of previously unincorporated San Joaquin County parcels which are largely vacant. This neighborhood also contains a few schools, commercial areas, and a large public park.

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The highest percentage of cost burdened renter-occupied households is 60 to 80 percent and is also located in a residential neighborhood in the northern part of Tracy and has the lowest percentage of owner-occupied households. This neighborhood is predominately newer single family and multifamily residential with several parks as well as some medical office uses. The City's RHNA strategy is not expected to exacerbate conditions of segregation.

In general, areas where overpayment is more prevalent are more highly populated and have larger proportions of people of color (see Figure C-3). Low- and moderate-income households, persons with a disability, and low and moderate resource tracts are also more concentrated in these areas (see Figure C-6, [Figure C-20](#)[Figure C-19](#), and [Figure C-27](#)[Figure C-26](#)).

Figure C-3534: Cost Burdened Owner-Occupied Households by Tract (2010-2014)



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Figure C-3635: Sites Inventory and Cost Burdened Owner-Occupied Households by Tract (2017-2021)

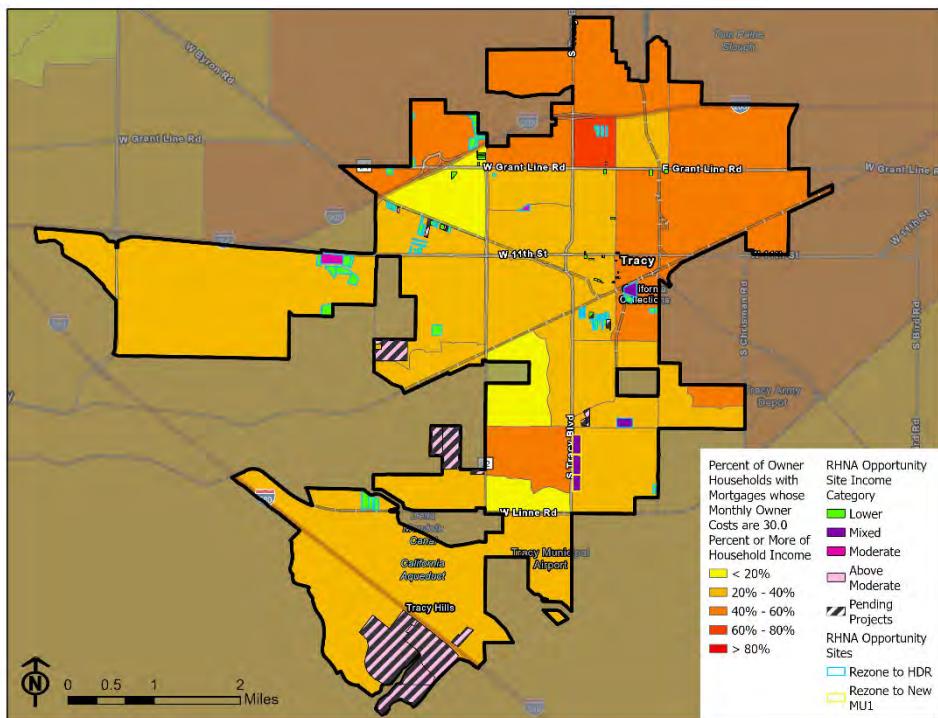
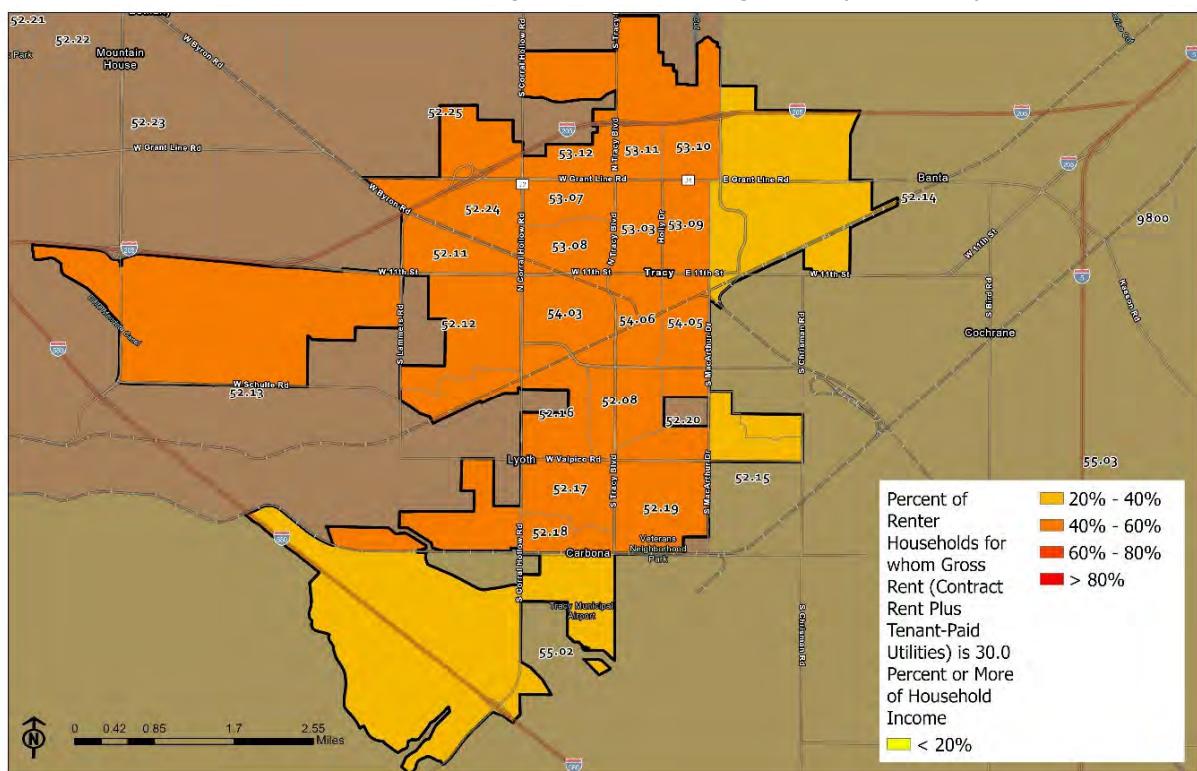
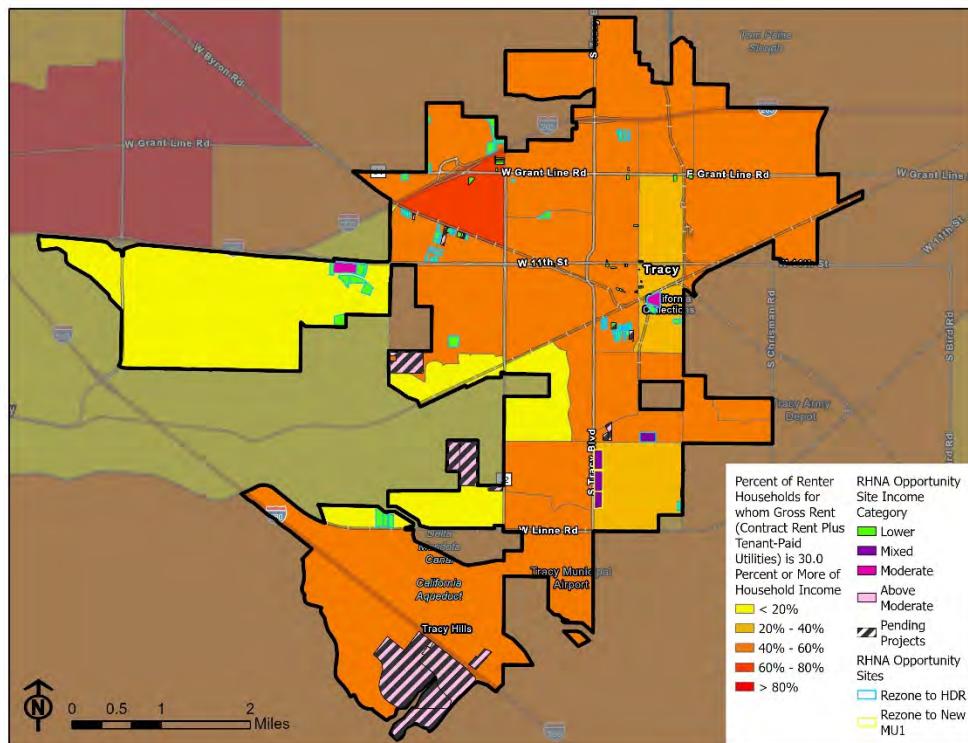


Figure C-3736: Cost Burdened Renter-Occupied Households by Tract (2010-2014)



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Figure C-3837: Sites Inventory and Cost Burdened Renter-Occupied Households by Tract (2017-2021)



2. Overcrowding

A household is considered overcrowded when there is more than one person per room, including living and dining rooms but excluding bathrooms and kitchens. Overcrowding can affect public facilities and services, reduce the quality of the physical environment, and create conditions that contribute to deterioration of the housing stock. Additionally, overcrowding can indicate that a community does not have an adequate supply of affordable housing and/or variety of suitable housing units to meet the needs of the community. Lower income households are more likely to experience overcrowding in order to make housing more affordable. Large families are also more prone to experiencing poverty.

[Figure C-39](#)[Figure C-38](#) shows overcrowded households by tract in Tracy. Tracy has six tracts that exceed the Statewide average of 8.2 percent, all of which are adjacent to each other and located in the northern and central part of the City. Low- and moderate-income households and populations of people of color are also more concentrated in these areas (see Figure C-6 and Figure C-3).

The highest percentage of overcrowded households is also the same area with the highest percentage of cost burdened owner-occupied households. This neighborhood has a mix of residential housing including assisted living facilities, single family, multifamily, and mobile home parks. It also contains a pocket of previously unincorporated San Joaquin County parcels which are largely vacant. This neighborhood also contains a few schools, commercial areas, and a large public park and fully integrated within the City. The City's RHNA strategy is not expected to exacerbate conditions of segregation.

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Overcrowding by tenure for the City of Tracy and San Joaquin County is included in Table C-2. As shown, overcrowding is less prevalent in the City (6.4 percent) compared to the County (7.4), including 2.3 percent of owner-occupied households and 4.2 percent of renter-occupied households.

Figure C-3938: Sites Inventory and Overcrowded Households by Tract (2017-2021)

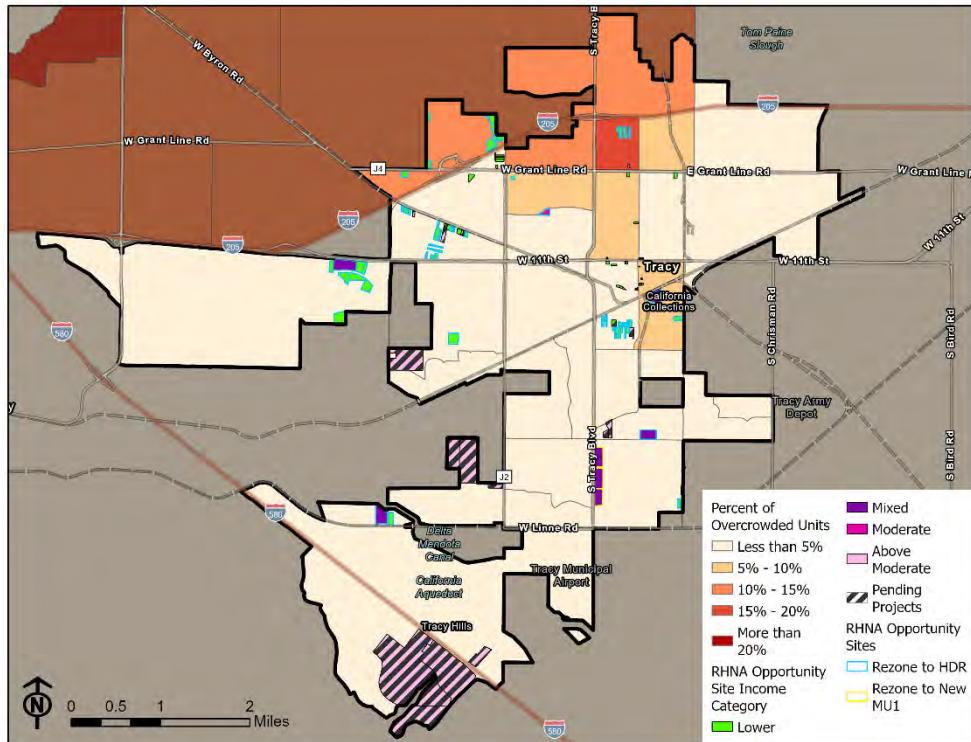


Table C-2: Overcrowding by Tenure (2019)

Jurisdiction	Persons per Room	Owners		Renters		Total	
		Overcrowded Households	% of Total	Overcrowded Households	% of Total	Overcrowded Households	% of Total
Tracy	1.01 to 1.50	1,205	1.6%	2,080	2.7%	3,285	4.2%
	>1.50	515	0.7%	1,154	1.5%	1,669	2.2%
	Total Overcrowded	1,720	2.3%	3,234	4.2%	4,954	6.4%
San Joaquin County	1.01 to 1.50	13,609	2.0%	23,805	3.5%	37,414	5.5%
	>1.50	3,704	0.5%	9,625	1.4%	13,329	1.9%
	Total Overcrowded	17,313	2.5%	33,430	4.9%	50,743	7.4%

Source: HUD CHAS Data, 2019

3. Homelessness

Continuums of Care are required by HUD to conduct a Point-in-Time (PIT) Count of sheltered individuals, youth, and families experiencing homelessness on a yearly basis. HUD only requires the count every two years for an unsheltered persons. As of May 2023, the results from January 2023

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PIT have not been released. This analysis relies on the 2022 San Joaquin County Homeless County and Survey to assess homelessness in the County.

Populations of persons experiencing homelessness are most concentrated in the Cities of Manteca and Stockton. Table C-3 shows the change in homeless population by jurisdiction from 2019 to 2022. During this period, all jurisdictions had a decrease in homeless population except for Lodi (+39.8%). The homeless population in Tracy decreased by 22.2 percent during this period.

Table C-3: Homeless Population by Jurisdiction (2019-2022)

Homeless Population	2019	2022	Percent Change
Stockton	921	893	-3.1%
Manteca	218	129	-51.3%
Tracy	155	124	-22.2%
Lodi	139	208	+39.8%
Lathrop	14	0*	-
Ripon	7	0*	-
Escalon	4	0*	-

Source: Analysis of Impediments/Regional PITC Data

** no count was conducted in these areas in 2022*

Local stakeholders noted that Tracy does not currently have the capacity to support people experiencing homelessness, as most of the social services and housing resources are located in Stockton. In September 2020, the Tracy City Council gave direction to move forward with the development of plans for the design and construction of a temporary housing facility. The project site is located on 4.8 acres at 370 W. Arbor Avenue. The 6,300-square-foot low-barrier navigation facility will accommodate people, pets, and possessions and is anticipated to provide shelter for approximately 68 residents within a congregate sprung shelter. Underground site work was completed in August 2022. This project has experienced significant delays in construction. The City Council gave direction to move on alternative housing options due to the delay in construction and declared an emergency shelter crisis (Resolution 2022-121). This Resolution directed the City Manager to take immediate and emergency actions necessary to implement interim housing solutions for Tracy's unsheltered population. These interim housing solutions provided a Phase 3 and Phase 4 of the Arbor Avenue site which allowed the City to procure goods and services to support additional units. Phase 3 consists of 48 units within modular dormitory facilities and Phase 4 includes 38 container units that are currently in construction. There are currently 48 beds in service at the Arbor Avenue site. In addition, the City has contracted with two providers, one that provides oversight of the shelter's day-to-day operations and the other that provides the referral and intake process for entry into the shelter.

According to local knowledge provided by City staff, in 2020 the City of Tracy developed a Homelessness Strategic Plan. This Homelessness Strategic Plan outlines an ongoing comprehensive strategy to make homelessness rare, brief, and non-recurring in the City of Tracy. The direction and goals included in this plan build upon the recent progress the City has made towards ending homelessness while also recognizing new practices, emerging challenges, and opportunities to develop a system that uses all available resources to house people experiencing homelessness.

In response to the growing number of people experiencing homelessness within the City of Tracy, a collaboration of stakeholders, local service providers, community members and elected officials

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have mobilized to address the challenges related to homelessness. These stakeholders include a collective of various organizations including those with educational, legal, business, and faith-based interests; local homeless service providers; city, county, and state agencies; private businesses and non-profit organizations; as well as private individuals and consumer advocates. This strong collaboration represents one of the greatest tools within the City of Tracy to combat homelessness.

Table C-4 lists emergency shelters and transitional housing in and adjacent to Tracy.

Table C-4: Homeless Facilities in or Adjacent to Tracy

Facility Name	Type of Facility	Target Population	Number of Shelter Beds of Families Served
Tracy Temporary Emergency Housing	Emergency Shelter	Adults	68 (upon completion)
Tracy Temporary Emergency Housing (Tracy Interim Shelter Site)	Low-Barrier Emergency Shelter	Adults/Couples/ Pets	48
McHenry Tracy Family Shelter	Transitional Housing	Families	7 Families
Emerson House	Transitional Housing	Men	18 Singles
Rochester House (older adults)	Supportive Transitional Housing	Men	10 Singles

In 2023, Tracy Code Enforcement opened/investigated 88 cases associated with encampments, 78 of which were reported encampment investigations. Local knowledge determined that the patterns of impact in the City showed that El Pescadero Park has a higher concentration of the homeless population and is a higher area of need.

El Pescadero Park is located in an area with some of the most prominent access to transit and transportation in the City. Local knowledge provided by City staff indicated concentrations of homelessness in the Gateway Project and Westside Specific Plan areas, as well as in Plasencia Fields park. A new multigenerational facility, with shelter provided, is being constructed within the City, with development anticipated to be complete in 2026.

In May 2020, the City Council adopted the Homeless Strategic Plan (Strategic Plan), which focuses on emergency, transitional and permanent housing options in the City. Preparation of the Strategic Plan included a variety of stakeholders. A detailed list of available State resources was also included. Services and facilities available to the homeless in and around Tracy are listed in Table 5.

Table 5: Homeless Services

Organization	Services
Central Valley Low Income Housing Corporation (Stockton)	Provides rent assistance and supportive services to homeless families and individuals, including case management, budgeting assistance/ counseling, education assistance, and job search preparation.
New Directions (Stockton)	Serves homeless individuals who have a history of substance abuse. Program participants reside in dormitories and receive supportive services which include individual and group counseling.
Lutheran Social Services of Northern California (Stockton)	Provides rent assistance and support services to homeless former foster youth with disabilities. Supportive services include case management, education assistance, child care, and transportation assistance.
Coalition of Tracy Citizens to Assist the Homeless (CTCAH)	Operates Emerson House, a transitional shelter for homeless men.
Tracy Interfaith Ministries	Provides bagged groceries and clothing for homeless individuals, and works with the Salvation Army to provide one-night vouchers for Tracy motels.
McHenry House Tracy Family	Provides shelter to homeless families and single women.

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Shelter	
Tracy Interim Shelter Site	Provides a low barrier shelter option to men, women, couples and pets.
Tracy Community Connections Center	Provides intake and referral support for Tracy's shelter. Provides a Navigation Center for Tracy residents in need of housing and resources.

Resources for homeless individuals are concentrated along Central Avenue/Holly Drive north of the 6th Street. Central Avenue/Holly Drive is one of the major north south collector roads that runs the entire length of the City connecting the newer part of the City (south) through downtown and the older part of the City north. Two facilities are located in downtown Tracy, which has one of the highest concentration of non-white populations and proportion of low- to moderate-income households (see [Figure C-3](#)[Figure C-3](#) and [Figure C-6](#)[Figure C-6](#)). Tracy Interfaith Ministries and the Coalition of Tracy Citizens to Assist the Homeless are located in the northern part of the City where there is the highest concentration of poverty (see [Figure C-13](#)[Figure C-12](#)). The Tracer bus serves these areas well (see [Figure C-29](#)[Figure C-28](#)). All local and commuter routes provide stops downtown and one local and commuter route has stops to the north and south of El Pescadero Park where Tracy Interfaith Ministries is located and where the largest population of unhoused individuals resides.

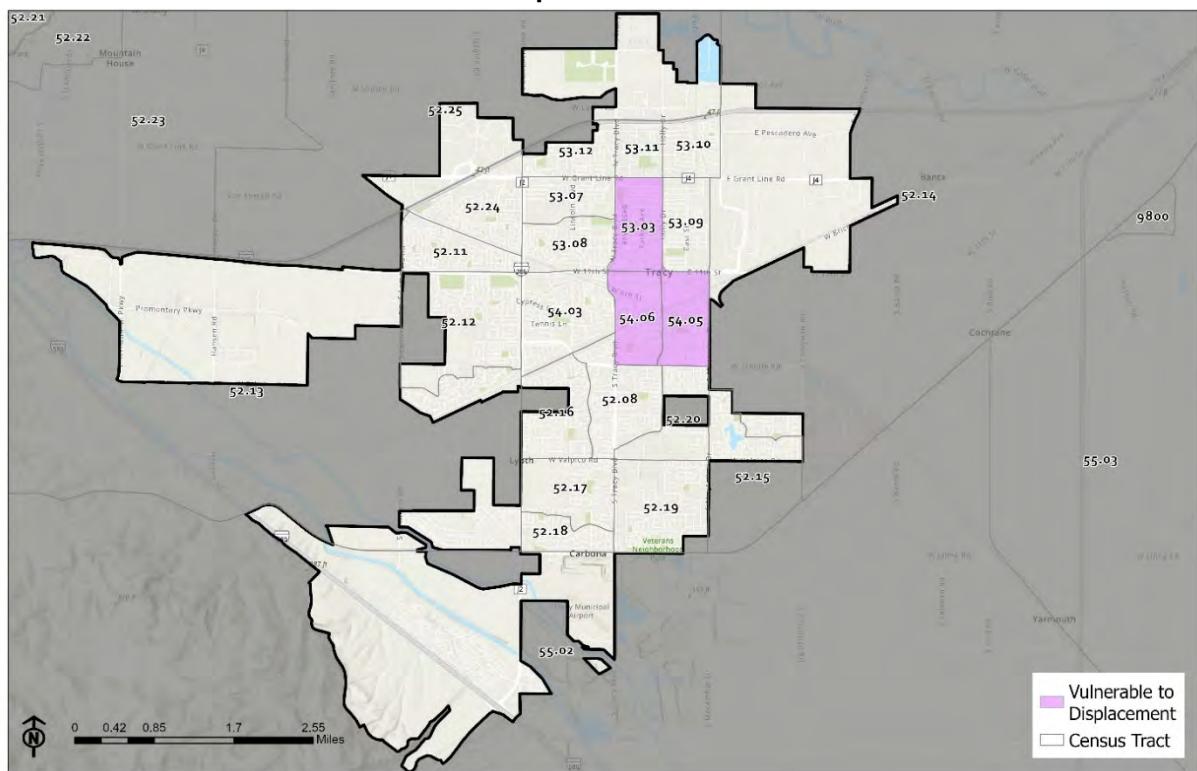
Displacement

The Urban Displacement Project at University of California, Berkeley, developed a map of “sensitive communities” where residents may be particularly vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. Sensitive communities are defined based on the following set of criteria:

- The share of very low-income residents is above 20 percent.
- The census tract must also meet two of the following criteria:
 - The share of renters is above 40 percent.
 - The share of people of color is above 50 percent.
 - The share of very low-income households (50 percent AMI or below) that are severely rent burdened is above the county median.
 - The census tract, or areas in close proximity, have been experiencing displacement pressures. Displacement pressure is defined as:
 - The percentage change in rent in a selected census tract, divided by county median rent increases OR
 - Median rent in a selected census tract, minus median rent for all surrounding tracts, divided by median rent for all tracts in county (rent gap).

[Figure C-1](#)[Figure C-39](#) shows the areas vulnerable to displacement as identified by the Urban Displacement Project. There are three tracts in the Tracy that have been identified as sensitive communities at risk of displacement. All of these tracts are located in central Tracy which includes the downtown core.

The City is attempting to meet its RHNA without displacing existing residents by identifying vacant and underutilized sites that do not have existing residential uses. Therefore, the City's RHNA strategy is not anticipated to exacerbate risk of displacement. Instead, it is expected to counteract this vulnerability and minimize displacement by planning for and providing new housing opportunities for all income levels in areas with greater risk of displacement.

Figure C-139: Communities Vulnerable to Displacement

1. Findings

Overall, the City of Tracy experiences housing problems at lower rate than the region as a whole, while rates of cost burden or overpayment are higher. The proportion of cost burdened renters and owners has varied from tract to tract between 2010 and 2021 and overcrowding is less prevalent in the City of Tracy compared to San Joaquin County.

The City is including a displacement prevention program to provide information and resources regarding displacement prevention and income protection and ensure there is no net loss of affordable housing units in the City. Additionally, the City is including a Down Payment Assistance (DAP) Down Loan Program provides deferred down payment assistance loans, for 20 percent of the sales price up to \$40,000 (Program 5) and a Housing Rehabilitation Program (Program 1) to assist property owners in making needed renovations and improvements affordable for low income homeowners.

B. Other Contributing Factors

1. Historical Land Use Development Trends

In 1878 construction of a new rail line was started from Oakland around the shores of San Francisco Bay, through Martinez to connect to the Central Pacific at a point three miles to the east of Ellis. The line had been built to make possible greater efficiency by avoiding hills and to eliminate the expense of helper engines. The result of the new rail line was the founding of Tracy on September 8, 1878. Tracy grew as a railroad center (railroad headquarters and supporting industries/services) as new

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lines were developed to Los Angeles. Tracy was incorporated in 1910 and grew rapidly after the first irrigation system was developed.

As the railroad operations declined agriculture became Tracy's primary industry in the 1950's. In the latter half of the 19th century, agriculture took hold, first with sheep grazing, moving flocks to the hills and down to the valley with the seasons, then with farming as the Delta levees were built and river irrigation established, and ultimately transitioning from sheep to cattle. Throughout the late 1800s and early 1900s, Tracy remained relatively small and isolated, reaching only 11,000 as late as 1960s. Tracy remained a regional railroad town and local commerce center for surrounding farms and ranches into the 1970s.⁵

Beginning at the end of the twentieth century, the City transitioned into a primarily residential community, as many people relocated from the Bay Area seeking affordable housing, a small-town feel, and a respite from a much more urban environment. This trend has continued and is the primary contributing factor to the current housing issues the City faces (affordability, lack of multifamily units, development at the fringes of the City).

As the population has grown and diversified so too has the economy, aided in part by numerous companies that have established distribution facilities in Tracy to take advantage of inexpensive land and proximity to three major freeways. Agriculture has remained a major activity within the City in the undeveloped areas of Tracy.

The first development occurred in what is now considered the downtown area, just north of the railroad crossing known as the 'bowtie'. Similar to many comparable cities, Tracy's oldest areas and oldest housing tends to be located downtown, less expensive than newer areas to the west and south and has the highest percent of the Hispanic and Latino population in the City. These older central areas of the City tend to have the most multifamily and rental housing as these were the most efficient land use patterns at the time of development, and predominately Hispanic and Latino as historically these groups migrated to support the prominent agriculture industry in Tracy. As a result, the older areas often have higher proportions of affordable housing without subsidies and lower-income households. Similarly, today's new housing will be more affordable than housing built in 10 or 20 years.

Tracy expanded as the agricultural and distribution industries expanded, due to where these industries located within the City (western and eastern parts of the City) it limited where within the City limits the City could build housing. With the expansion of these industries the City of Tracy more than doubled its population between 1990 and 2004, from 33,500 to 74,070 residents. During this time, Tracy became more racially and ethnically diverse, as the percentage of Caucasians dropped from 68 to 56 percent and that of African Americans, Asian or Pacific Islanders and Hispanics each increased by 3 to 5 percent. The newer residential neighborhoods that were developed to support these groups were located in the west and southern part of the City. One census tract in west Tracy located along Byron Road consists of single family tracts and has the highest percent of the Asian population in Tracy. The other part of the City with newer housing is located in south Tracy which is largely comprised of specific plan areas (i.e. Tracy Hills and Ellis) and is predominately white.

According to the San Joaquin Valley Fair Housing and Equity Assessment, the North Valley (particularly San Joaquin County) will likely continue to see an influx of commuters and displaced

⁵ <https://tracymuseum.org/tracy-history/>

residents from Alameda and Santa Clara counties, unless the San Francisco Bay Area finds a way to better accommodate all of its workers.⁶ This could result in the continued increase in demand for housing in Tracy and drive housing costs even higher, potentially displacing existing residents.

The geographic division created by the railroad tracks in the downtown “bowtie” area, creates an area of less-desirable real estate immediately south along Central Avenue. This area has a concentration of lower-income housing in part due to lower land costs, this area also has a concentration of the oldest housing stock in the City. While not intentional, this divide has led to a concentration of low-income and non-White residents south of the “bowtie”.

According to local knowledge provided by City staff, the City of Tracy has been a regional leader in the development of residential, commercial and industrial growth. This City has grown from a population of 34,401 in 1990 to over 98,000 in 2023. This is an increase of 63,599 residents in 33 years.

This amount of growth has been made possible by large scale residential development projects. Although there has been numerous infill development over the years, it has been mainly larger subdivisions and residential specific plans that have driven this sustained residential growth. The City has a history of approving and ultimately working with the development community to ensure projects are built and completed.

Although the majority of development occurs in larger subdivisions, the City has also adopted regulations within the Growth Management Ordinance and its Guidelines that prioritize infill development, by setting aside RGAs each year for projects that meet certain criteria such as affordability, higher density, completion of gaps in infrastructure, and compilation of multiple parcels.

There is no history of redlining or racial covenants in the City of Tracy, as the City is relatively new and the majority of development occurred after such covenants became illegal.

2. Transportation Investments

Additionally, the Parks, Recreation and Trails Master Plan⁷ the “bowtie” area was identified as an opportunity area for new recreation facilities in the park access gap analysis.

Active transportation is supported through several regional policies. Measure K is a half-cent tax for transportation projects and funds a wide variety of projects and programs. This policy has been renewed until 2041. The City is included in the San Joaquin Council of Governments Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan (2012), which supports increased bicycle and pedestrian mobility and safety throughout the county. The City also has a newly adopted Parks, Recreation and Trails Master Plan which summarizes the needs for parks, recreation and trails, in new and existing residential areas. Additionally, the City is currently preparing a Downtown TOD Specific Plan will identify the community’s vision and establish goals, objectives, and policies for future development as well as identify approaches to implement and fund future development. The City is including Program 18 to facilitate place-based improvements and investment in areas/projects identified in the Active Transportation Plan and Parks, Recreation and Trails Master Plan and Downtown TOD Specific Plan.

⁶ Smart Valley Places. San Joaquin Valley Fair Housing and Equity Assessment. April 2014.

<https://www.frbsf.org/wpcontent/uploads/sites/3/SJV-Fair-Housing-and-Equity-Assessment.pdf>

⁷ City of Tracy Citywide Parks, Recreation & Trails Master Plan Update. August 2022 Draft.

<https://www.cityoftracy.org/home/showpublisheddocument/13465/637940272102730000>

Appendix C. Affirmatively Furthering Fair Housing

The City has multiple projects in its Capital Improvements Plan identified to improve mobility, and active transportation opportunities. The 2023-2024 Capital Improvements Plan includes investment of \$221,382,041 into 104 capital improvement projects, including:

- Holly Drive Pedestrian & Bikeway Improvements: The City is investing 1.83 million dollars to improve pedestrian and bikeway infrastructure in the central area of the City on Holly Drive between 11th Street and Clover Road, including installing a Class 3 bike route, Class 2 bicycle lanes, sidewalk, pavement patching, slurry seal, signage, striping, and pavement markings.
- Tracy Boulevard Sidewalk: This project will close the missing sidewalk gap to the ACE Train Station parking lot immediately south of the project area. (\$852,465)
- Valpico Roadway Improvements - Tracy Blvd to MacArthur Drive: This project will involve the roadway widening of Valpico Road from Tracy Blvd to MacArthur Drive, with two lanes in each direction, complete with all necessary improvements like curb, gutter, sidewalk, median, irrigation facilities, landscaping, drainage facilities, street lighting, signage and striping. (\$6,053,140)

3. Capital Improvement Projects / Infrastructure Gaps

The City of Tracy has placed a renewed importance on the timing of infrastructure and reviewing capital infrastructure timing and location to ensure that services and utilities are provided to the community. The Assistant City Manager is now reviewing the overall CIP program to ensure the timing and financing of capital improvement projects are provided throughout the community. The community has voiced their concerns to the City Council about needed infrastructure improvements.

The City is rethinking about how projects are financed and how to accelerate the construction of needed improvements. This will help speed up the construction of industrial, commercial and residential projects city-wide. The city is coordinating efforts to make sure that the opportunity sites will have needed infrastructure to construct.

C. Fair Housing Issues, Contributing Factors, and Meaningful Action

The City has adopted goals and actions that specifically address the contributing factors identified in the AFFH analysis. While the City views all contributing factors as an important priority to address, higher priority was given to factors that limit fair housing choice and/or negatively impact fair housing, per Government Code section 65583(c)(10)(A)(iv).

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Table C-1**Table C-6** displays the identified fair housing issue, contributing factor, actions taken to address the contributing factor, and priority level for each issue. Relevant programs are referenced in the action column for each contributing factor.

Table C-16: Contributing Factors

Identified Fair Housing Issue	Contributing Factor	Action	Priority
Segregation and Integration	<ul style="list-style-type: none"> • Lack of availability of high density zoning • Variety and availability of affordable housing 	Program 4 – Affordable Housing Monitoring Program 8 – Housing Choice Voucher Program Program 4-9 – Provision of Adequate Sites and Monitoring of No Net Loss <ul style="list-style-type: none"> • Significant rezoning of opportunity areas in high resource areas Program 13 – Inclusionary Housing	Moderate
Disproportionate Housing Needs	<ul style="list-style-type: none"> • Variety and availability of affordable housing • Lack of public investment in low resource areas • Lack of adequate infrastructure for growth in high resource areas 	Program 1 – Housing Rehabilitation Program 4 – Affordable Housing Monitoring Program 6 – Home buyer and literacy training Program 7 – Affordable and Workforce Housing Program 12-11 – Property Acquisition and Improvement <u>Program 20 – Displacement Prevention</u>	High
Access to Opportunities	<ul style="list-style-type: none"> • Lack of availability of high density zoning • Variety and availability of affordable housing • Access to financial services • Lack of public investment in low resource areas • <u>Disparities in access to amenities and infrastructure</u> 	Program 4 – Affordable Housing Monitoring Program 5 – <u>Down payment Assistance DAP</u> Loan Program Program 6 – Home buyer and literacy training 10 Year Economic Development Strategic Plan Program 7 – Affordable and Workforce Housing Program 13 – Inclusionary Housing <u>Program 18 – Place Based Improvements</u>	High
Outreach and Enforcement Capacity	<ul style="list-style-type: none"> • Lack of resources for fair housing agencies and organizations • Lack of marketing community meetings • Lack of language access • <u>Increased needs of homeless population</u> • <u>Disparities in access to amenities and infrastructure</u> 	Program 17 – Fair Housing <ul style="list-style-type: none"> • Contracting with the fair housing provider to provide services. <u>Program 19 –</u> Housing Resources Education and Bilingual Materials <u>Program 18 – Place Based Improvements</u> <u>Program 20 – Displacement Prevention</u> <u>Program 8 – Housing Choice Voucher Program</u>	Low

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Table C-7 provides a detailed overview of actions included in Housing Element Programs that are aimed at affirmatively furthering fair housing. The table separates the actions by their identified fair housing issue and priority level. It summarizes the specific commitment, timeline, geographic targeting, and metric for each program.

Table C-2: AFFH Actions Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
Fair Housing Outreach and Enforcement				
Program 18 – Fair Housing	<p>The City actively furthers fair housing in the community. Specifically, the City contracts the San Joaquin Fair Housing Association to promote fair housing and provide fair housing services for its residents. The City participates in providing an annual direct allocation to the San Joaquin Fair Housing Association through the CDBG program.</p> <p>Increase Spanish language outreach to this Hispanic population especially in areas with concentrations of Hispanic residents.</p>	By July 2025, begin promoting fair housing services via social media platforms	Citywide, targeted outreach in lower resource, lower income neighborhoods, including central northern and northeastern Tracy	<p>Continue to support the San Joaquin Fair Housing Association, or other qualified fair housing agencies, annually with CDBG funds and refer residents seeking fair housing assistance on an ongoing basis.</p> <p>Advertise the services provided by the San Joaquin Fair Housing Association (or other qualified fair housing agencies) on an ongoing basis in City buildings and other public buildings (such as public libraries, community centers, County Housing Authority offices, and post offices, etc.).</p>
Program 20 – Housing Resources Education and Bilingual Materials	The City will promote and advertise available housing resources to residents through a variety of mediums. The City will continue to promote homebuyer assistance programs available through the City, County, and State, such as the Tracy Down Payment Assistance Down Loan Program, the San Joaquin County Home Rehabilitation Program, the Mortgage Credit Certificate (MCC) program and California Housing Finance Agency's down payment assistance programs.	Annually	Citywide, targeted outreach in lower resource, lower income neighborhoods, including central northern and northeastern Tracy.	Provide bilingual (Spanish and English) information on housing resources to at least 200 households annually utilizing a minimum of four (4) mediums of outreach

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<ul style="list-style-type: none"> • The City will provide information on housing resources to at least 200 households annually, through the following mediums: <ul style="list-style-type: none"> • Providing information regarding housing resources on the City website. • Pamphlets on the programs available at City Hall and other community locations such as the Senior Center and Library. • Advertising housing resources through social media. • Presence at a booth in community events at least once per year. • Provision of materials in Spanish and English. • The City will continue to encourage improved community participation and representation in all official city business, events, and communications. The City will contract with a translation service as needed for meetings, putting a standard note on all hearing notices and communications in Spanish indicating that interpretation and translation services are available upon request. The City will contract with a translation service for direct on the spot translation/interpretation needs at the front counter. • The City will review demographic changes in the City to determine if translation should be provided for new or additional languages every four years. Translation to additional languages added as 			

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	determined by demographic analysis.			
New Opportunities in High Resource Areas				
Program 4 – Affordable Housing Monitoring	<p>The City of Tracy has seven publicly assisted housing developments, with a combined total of 659 units that are set aside as affordable for lower income households. Project-based Section 8 contract for the 87-unit Tracy Garden Apartments will expire in July 2028. In 2031, the Low Income Housing Tax Credits (LIHTC) for the Chesapeake Bay Apartments complex are set to expire, which would impact 138 two-bedroom units and 12 three-bedroom affordable units. Therefore, 237 affordable units in Tracy are considered at-risk of becoming market rate during this 6th Housing Element cycle.</p> <p>The City will work to preserve the long-term affordability of its affordable housing inventory, including 237 units at risk during this planning cycle.</p>	<p>Annually monitor status of affordable units by maintaining contact with property owners and updates from HUD's Multi-Family Housing division.</p> <p>Annually solicit interest and participation of nonprofit housing developers to acquire and preserve housing to be maintained as affordable units.</p> <p>Annually pursue funding available from state and federal programs to improve and preserve existing affordable housing</p>	Citywide	<p>If a Notice of Intent is filed to opt out of low income housing use, work with property owners to ensure compliance with noticing requirements (three years, one year, and six months advance notices required). Education of alternative housing options should be provided to tenants.</p>
Program 5 – DAP Loan Program	<p>The Tracy Down Payment Assistance (DAP) Loan Program provides deferred down payment assistance loans, for 20 percent of the sales price up to \$40,000 (whichever is the lesser), to low income, first-time homebuyers for the purchase of a home in Tracy. The loans are intended to bridge the “gap” between the cost of a home and what a low income household can afford. The program is administered by the San</p>	<p>Provide down payment assistance to ten qualified lower income households (up to 80 percent AMI) during the Housing Element planning period.</p>	<p>Citywide, targeted outreach in lower resource, lower income neighborhoods, including central northern and northeastern Tracy</p>	<p>Provide down payment assistance to ten qualified lower income households (up to 80 percent AMI) during the Housing Element planning period.</p> <p>Disseminate information through City website and social media platforms.</p>

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	Joaquin County Neighborhood Preservation Division.			
Program 6 – Home buyer and literacy training	<p>Homebuyer and financial literacy education represents a key step to introducing households to the challenges, responsibilities, and benefits of homeownership. These programs also serve as critical components of asset-building, helping families build wealth – savings and equity – rather than living paycheck to paycheck. In particular, homebuyer education programs help first-time buyers evaluate their financial readiness, understand the home buying process, explore different financing options, access homebuyer assistance programs, resolve credit issues, and avoid predatory lending practices. Other asset-building education programs address financial literacy more broadly. Homebuyer and financial literacy programs are best offered in tandem with demand-side initiatives such as a down payment assistance program.</p>	Ongoing	<p>Citywide, targeted outreach in lower resource, lower income neighborhoods, including central northern and northeastern Tracy</p>	<p>Require a “Certificate of Completion” from a HUD-approved homebuyer class in order to participate in the DAP Loan Program.</p> <p>Partner with qualified local non-profit agencies to offer homebuyer education classes and publicize the availability of these classes to residents twice during the planning period.</p>
Program 7 – Affordable and Workforce Housing	<p>On March 2, 2021, the City Council approved the scope of work for an action plan to address affordable/workforce housing. Completing this action plan will be a priority project for the City upon adoption of the Housing Element. Estimated timelines for this plan are late 2025 and early 2026 in coordination with other Development Code updates. These include:</p>	Ongoing	<p>Higher opportunity, higher income, single-family neighborhoods, including western and southern Tracy</p>	<p>Continue to prioritize the allocation of RGAs to affordable housing projects (particularly for those projects that set aside units for extremely low income households and persons with special needs, including those with developmental disabilities, and farmworkers).</p> <p>Continue to provide density bonuses and other incentives on</p>

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<ul style="list-style-type: none"> • Amend Zoning Ordinance to permit high density housing by right in certain commercial zones. • Update the Zoning Ordinance with the most recent State law changes regarding ADUs. • Rezone two sites, currently zoned Industrial, to accommodate the City's RHNA. • Increase maximum densities in higher density residential zones. • Remove minimum lot size in favor of floor area ratio and/or units per acre in residential zones. • Increase minimum density in medium density residential zones. • Allow and encourage duplexes, triplexes, and fourplexes in new single-family home subdivisions. • Create and apply an overlay zone that allows clusters of tiny homes. • Amend the City's parking ordinance to reduce the number of off-street parking spaces required for new multi-family housing development projects. • Develop objective design standards for multi-family development. 			<p>an ongoing basis to developers who provide affordable units, such as technical assistance related to City policies and regulations, and pre-application consultation with staff.</p> <p>Complete the Affordable/Workforce Housing Action Plan by March 2026. As part of the plan, pursue rezoning and zoning code amendments as outlined in various programs to facilitate affordable and workforce housing.</p> <p>Annually during City budgeting process, prioritize actions to pursue to expand housing choices and opportunities.</p> <p>Facilitate the development of 200 affordable housing units beyond the RHNA over eight years, with the goal of prioritizing housing for persons with special needs, including extremely-low income households and farmworkers. Utilize the incentives listed in this program and work with interested local developers, the County Housing Authority, religious and educational facilities and organizations and nonprofits toward the development of the affordable units. Pursue residential development on the Merrill F</p>

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
				<p>West High School site (residential uses would be in addition to the school and not replace it) as part of the [REDACTED] moderate income unit buffer. At least every other year, beginning in 2026, the City will take the following actions:</p> <ul style="list-style-type: none"> o Outreach to property owners of educational and religious facilities; [REDACTED] o Informational materials, including what is allowed under SB4; and [REDACTED] o Technical assistance with the application process. <p>Adopt a policy to grant priority water and wastewater services to housing with units affordable to lower-income households when capacity is limited and warrants allocation.</p> <p>Annually identify potential housing opportunities and provide information to interested developers via a list of properties that can be updated as needed.</p>
Program 13: Inclusionary Housing	Explore the potential and set the stage for an inclusionary housing program that includes an extremely low income housing component by the end of 2025.	By the end of 2025	Citywide	Increase affordable housing by at least 10 percent of all new housing.

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
Housing Mobility				
Program 4 – Affordable Housing Monitoring	<p>The City of Tracy has seven publicly assisted housing developments, with a combined total of 659 units that are set aside as affordable for lower income households. Project-based Section 8 contract for the 87-unit Tracy Garden Apartments will expire in July 2028. In 2031, the Low Income Housing Tax Credits (LIHTC) for the Chesapeake Bay Apartments complex are set to expire, which would impact 138 two-bedroom units and 12 three-bedroom affordable units. Therefore, 237 affordable units in Tracy are considered at-risk of becoming market rate during this 6th Housing Element cycle.</p> <p>The City will work to preserve the long-term affordability of its affordable housing inventory, including 237 units at risk during this planning cycle.</p>	<p>Annually monitor status of affordable units by maintaining contact with property owners and updates from HUD's Multi-Family Housing division.</p> <p>Annually solicit interest and participation of nonprofit housing developers to acquire and preserve housing to be maintained as affordable units.</p> <p>Annually pursue funding available from state and federal programs to improve and preserve existing affordable housing</p>	Citywide	<p>If a Notice of Intent is filed to opt out of low income housing use, work with property owners to ensure compliance with noticing requirements (three years, one year, and six months advance notices required).</p> <p>Education of alternative housing options should be provided to tenants.</p>
Program 8 – Housing Choice Voucher Program	<p>The City of Tracy contracts with the Housing Authority of the County of San Joaquin (HACSJ) to manage the Housing Choice Voucher (HCV) program, which provides rent subsidies in the form of housing assistance payments to private landlords on behalf of eligible families. The HCV program, funded by HUD, provides housing assistance to extremely low and very low income families, senior citizens, and disabled or handicapped persons. Its objective is to provide affordable,</p>	<p>By July 2025, create a Fair Housing Factsheet to be included in the ADU application packet.</p> <p>Annually contact the HACSJ to obtain information on the status of the HCV program and other available resources</p>	Citywide	<p>Disseminate information to the public regarding the HCV program and promote participation by rental property owners.</p> <p>Continue to support HACSJ's petition for increased funding from HUD.</p> <p>Continue to work with HACSJ to provide HCVs to Tracy residents, with the goal of increasing HCV use in the City</p>

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>decent and safe housing for eligible families, while increasing a family's residential mobility and choice. The Voucher Program also includes programs such as Family Self-Sufficiency and Welfare to Work. These are designed to assist families in becoming economically self-sufficient.</p>			<p>by 20 percent (from 160 recipients) by the end of 2031. Continue to work with the HAC SJ to assist households through the Family Self-Sufficiency Program.</p>
Program 9 – Provision of Adequate Sites and Monitoring of No Net Loss	<p>For the 6th cycle Housing Element, the City has been assigned a Regional Housing Needs Assessment (RHNA) of 8,830 units, including:</p> <ul style="list-style-type: none"> • Very Low Income: 2,994 units • Low Income: 1,879 units • Moderate Income: 1,175 units • Above Moderate: 2,782 units <p>In addition, the City has yet to complete the rezoning of 31.7 acres to meet the shortfall for the 5th cycle Housing Element RHNA. Combined, the City has a RHNA obligation of 9,330 units.</p> <p>The City is committed to ensuring that adequate sites at appropriate densities remain available during the planning period, as required by law. Specifically, the City already has pending projects that account for 3,113 units (118 very low income, 23 low income, and 2,972 above moderate income units). Projected ADUs also account for 330 units. Overall, the City has a remaining RHNA obligation of 5,610 units (2,777 very low income, 1,757 low income, and 1,076 moderate income units).</p>	<p>By July 2025, establish a formal procedure to monitor no-net-loss of capacity in meeting the City's RHNA and amend the Zoning Ordinance to provide for by-right approval for projects that include 20 percent of the units for lower income households.</p> <p>By-right approval is available to reuse sites effective December 31, 2023</p> <p>By-right approval is available to rezone sites effective upon rezoning</p> <p>By July 2025, complete rezoning of the sites identified in the sites inventory for rezoning.</p> <p>In 2027, the City will evaluate the progress of pending projects counted toward the RHNA to ensure that development of housing units is occurring as projected. If it is determined after consultation with developers that the projects</p>	Denoted rezone areas	Make the inventory of sites available to interested developers after adoption of the Housing Element

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>Under existing zoning, the City has realistic capacity for 1,016 lower income units and 754 moderate income units, creating a lower income shortfall of 3,857 units and a moderate-income shortfall of 421 units. The City's overall strategy is to accommodate the RHNA shortfall through increasing the permitted densities of existing multi-family zones, rezoning limited single-family and commercial areas to multi-family residential, and creating programs to facilitate increased ADU production in single-family zones. These strategies will allow the City to fully meet its housing needs for all income levels during the 6th Cycle Housing Element. Rezoning will meet all requirements pursuant to Government Code Section 65583.2, subdivisions (h) and (i).</p> <p>As required by law, the following types of sites are subject to by-right approval without discretionary review if the project includes 20 percent of the units as housing affordable to lower income households:</p> <ul style="list-style-type: none"> • Reuse Sites: Vacant sites that were used to meet the City's 4th and 5th cycles RHNA for lower income units; • Reuse Sites: Nonvacant sites that were used to meet the City's 5th cycle RHNA for lower income units; and 	<p>are not proceeding as planned and would result in a shortfall in RHNA sites, the City will identify alternative sites strategies (including potential rezoning) within six months.</p>		

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<ul style="list-style-type: none"> Rezone Sites: Sites to be rezoned to meet the 6th cycle RHNA for lower income units. <p>To ensure that the City complies with SB 166 (No Net Loss), the City will monitor the consumption of residential and mixed-use acreage to ensure an adequate inventory is available to meet the City's RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction in capacity below the residential capacity needed to accommodate the remaining need for lower and moderate income households, the City will identify and if necessary, rezone sufficient sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA.</p>			
Program 12 – Accessory Dwelling Units	<p>The City last updated its ADU ordinance in 2018. Since that time, the law on ADUs has substantially changed. The City will update its ADU ordinance to comply with California Government Code Sections 65852.2 and 65852.22. The City will facilitate the construction of ADUs as an alternative source of affordable housing.</p>	<p>Annually monitor If ADUs are not affordable to lower-income residents, reach out to community groups and advertise the tools being developed below to encourage ADU construction. If by the end of 2027 and the end of 2029, the number of ADUs are not meeting the projections in this Housing Element, the City will identify additional</p>	Citywide; targeted outreach in higher opportunity, higher income, single-family neighborhoods, including western and southern Tracy	<p>By July 2025: Update City website to provide a link to California Housing Finance Agency (CalHFA) ADU Grant Program. Update the Zoning Code to comply with State requirements for ADUs. Develop an information sheet/brochure on ADUs, including building requirements and the permitting process, that</p>

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
		residential development sites (including rezoning if needed) within six months of the identified ADU shortage		<p>may be given to interested property owners and kept at the Planning/Development Services Department. This information should also be included on the City website.</p> <p>Develop and include a Fair Housing Factsheet, especially on Source of Income protection (i.e., use of public subsidies such as Housing Choice Vouchers for housing payments) in the ADU application packet.</p> <p>Develop incentives to encourage development of ADUs, including financial assistance (from state programs if available) to assist lower income homeowners with construction, pre-approved plans, and dedicated counter time for technical assistance, among others.</p> <p>Modify the building permit tracking system records to document and monitor ADU construction and demolition permits.</p> <p>Facilitate construction of 330 ADUs within the planning period.</p> <p>Twice during the planning period, monitor permitted ADUs and their affordability. If ADUs are not affordable to lower-income residents, adjust</p>

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
				ADU assumptions made in this Element within a year.
Program 7 – Affordable and Workforce Housing	<p>On March 2, 2021, the City Council approved a scope of work for an action plan to address affordable/workforce housing. Completing this action plan will be a priority project for the City upon adoption of the Housing Element. Estimated timelines for this plan are late 2025 and early 2026 in coordination with other Development Code updates. These include:</p> <ul style="list-style-type: none"> • Amend Zoning Ordinance to permit high density housing by right in certain commercial zones. • Update the Zoning Ordinance with the most recent State law changes regarding ADUs. • Rezone two sites, currently zoned Industrial, to accommodate the City's RHNA. • Increase maximum densities in higher density residential zones. • Remove minimum lot size in favor of floor area ratio and/or units per acre in residential zones. • Increase minimum density in medium density residential zones. • Allow and encourage duplexes, triplexes, and fourplexes in new single-family home subdivisions. • Create and apply an overlay zone that allows clusters of tiny homes. • Amend the City's parking ordinance to reduce the number of off-street parking spaces required 	<p>Annually during City budgeting process, prioritize actions to pursue to expand housing choices and opportunities.</p> <p>Annually identify potential housing opportunities and provide information to interested developers via a list of properties that can be updated as needed.</p>	Higher opportunity, higher income, single-family neighborhoods, including western and southern Tracy	<p>Complete the Affordable/Workforce Housing Action Plan by March 2026. As part of the plan, pursue rezoning and zoning code amendments as outlined in various programs to facilitate affordable and workforce housing.</p> <p>Facilitate the development of 200 affordable housing units beyond the RHNA over eight years, with the goal of prioritizing housing for persons with special needs, including extremely-low income households and farmworkers. Utilize the incentives listed above in this program and work with interested local developers, the County Housing Authority, religious and educational facilities and organizations and nonprofits toward the development of the affordable units. Pursue residential development on the Merrill F West High School site (residential uses would be in addition to the school and not replace it) as part of the moderate income unit buffer. At least every other year, beginning in 2026, the City will take the following actions:</p>

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>for new multi-family housing development projects.</p> <ul style="list-style-type: none"> • Develop objective design standards for multi-family development. • Consider inclusionary housing program. 			<ul style="list-style-type: none"> - Outreach to property owners of educational and religious facilities; - Informational materials, including what is allowed under SB4; and - Technical assistance with the application process. <p>Adopt a policy to grant priority water and wastewater services to housing with units affordable to lower-income households whenever capacity is limited and warrants allocation.</p>
Place-Based Improvements				
Program 19 – Place-Based Improvements	<p>The City is pursuing a number of investments, long-range planning efforts, and improvements in various geographic areas of the City with greater need, specifically downtown Tracy and central areas of the City. These place-based improvements will help improve quality of life and spur economic investment in areas of the City with greater need.</p> <p>The City will continue to prioritize the Capital Improvement Program and implement broader planning efforts, annually apply for funding, and implement broader planning efforts, including but not limited to the Active Transportation Plan, the Parks, Recreation and Trails Master Plan and the Downtown TOD Specific Plan. These plans will serve to continue to improve</p>	Annually apply for funding to assist with implementation	<p>Citywide, implementation based on the prioritized key areas identified in the 10-Year Economic Development Strategic Plan</p> <p>Focus on areas of low opportunity and low income, including central northern and northeastern Tracy</p>	Completion of four Capital Improvement Projects in each of the top three prioritized key areas identified in the 10-Year Economic Development Strategic Plan.

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>communities through neighborhood improvements such as enhanced streetscapes, multi-modal and active transportation, pedestrian safety improvements, safe routes to schools, community facilities, park improvements, and other community amenities.</p> <p>Specific place-based efforts including the following (Completion of two CIPs in each of the top three prioritized key areas identified in the 10-Year Economic Development Strategic Plan):</p> <ul style="list-style-type: none"> • City has multiple projects in its Capital Improvements Plan identified to improve mobility, and active transportation opportunities, and park quality in the downtown and central parts of the City. The 2023-2024 Capital Improvements Plan includes investment of \$221,382,041 into 104 capital improvement projects. Many of these identified projects are in the downtown and central areas of the City, including: <ul style="list-style-type: none"> • Grand Theater Repair. Exterior repair for the historic Grand Theater/Center of the Arts building in downtown Tracy. • Holly Drive Pedestrian & Bikeway Improvements: The City is investing 1.83 million dollars to improve pedestrian and bikeway infrastructure in the central area of the City on Holly Drive between 11th Street and Clover Road, including installing a Class 			

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>3 bike route, Class 2 bicycle lanes, sidewalk, pavement patching, slurry seal, signage, striping, and pavement markings.</p> <ul style="list-style-type: none"> • Tracy Boulevard Sidewalk. This project will close the missing sidewalk gap to the ACE Train Station parking lot immediately south of the project area. (\$852,465) • Valpico Roadway Improvements - Tracy Blvd to MacArthur Drive. This project will involve the roadway widening of Valpico Road from Tracy Blvd to MacArthur Drive, with two lanes in each direction, complete with all necessary improvements like curb, gutter, sidewalk, median, irrigation facilities, landscaping, drainage facilities, street lighting, signage and striping. (\$6,053,140) • A.R. Glover Park Improvements: Renovation of the playground, a new picnic area, renovation of the sport court, pathway lighting, ADA barrier removal, landscaping, and site furnishing replacements (\$725,000). • Hoyt Park - Per Capita Improvements. The City of Tracy has the opportunity to rehabilitate existing infrastructure at Hoyt Park through the Proposition 68, Per Capita Program. (\$348,835) • Clyde Bland Park BMX Pump Track. Construction of a new ½-acre BMX pump track (bike park) in an existing City park. 			

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>The project would create a looped asphalt track with a sequence of rollers and berms for bike riders. Associated improvements would include: earthwork, drainage, accessibility, shaded seating as well as related site furnishings, and landscaping. (\$999,416)</p> <ul style="list-style-type: none"> • The City will annually prioritize the capital improvement program to improve mobility, active transportation opportunities and other community services in targeted neighborhoods • Ten-Year Economic Development Strategic Plan: In September 2023, the City adopted a Ten-Year Economic Development Strategic Plan to help the City focus implementation efforts on strategic economic development priorities. The strategic plan identified and prioritized eight key areas as opportunity sites. The top priority identified is the downtown area, the second is the west side, and the third is commercial corridors in the center of the City. The downtown area and commercial corridors are lower resource areas, compared to the rest of the City. The strategic plan helps support growth in these areas and makes recommendations to enhance economic resilience, expand market access, encourage investment, improve quality of life, and improve infrastructure in these areas. 			

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<ul style="list-style-type: none"> Downtown Transit-Oriented Development (TOD) Specific Plan: The Downtown Transit-Oriented Development (TOD) Specific Plan will identify the community's vision and establish goals, objectives, and policies for future development in Downtown Tracy. In 2020, the City released the Downtown TOD Study which comprises the first phase of the Downtown TOD Project, an effort that will plan for the introduction of Valley Link commuter rail service in Downtown Tracy and the surrounding areas. The study also provides recommendations for planning tools that the City can prepare and adopt to implement the concept, along with possible grant funding sources to help fund the preparation of the planning tools, catalyze development, and pay for infrastructure improvements. <p>The study highlights circulation improvement recommendations for 11th Street, Central Avenue – Downtown, 3rd Street, Central Avenue, and Mt Diablo Avenue to improve the following:</p> <ul style="list-style-type: none"> Decrease crossing distances for pedestrians, Improve safety for bicyclists, and Increase the visibility of both pedestrians and bicyclists. <p>Citywide Parks, Recreation & Trails Master Plan: The Plan outlines a long-range vision for the city-wide</p>			

Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>system of parks and trails that responds to the community's aspirations. It also establishes a set of priorities for the years ahead and identifies strategies to leverage partnerships and financing to achieve these priorities. The Plan identifies clear policy guidance for our development partners as they propose new residential developments.</p> <ul style="list-style-type: none"> • Citywide Roadway & Transportation Master Plan: The Plan builds upon the goals and objectives as defined in the Circulation Element of the City's General Plan (February 2011) and the Sustainable Action Plan (SAP) (February 2011). The TMP incorporates various strategies, principles, and design elements that balance existing and future transportation infrastructure needs with providing safe access for all user groups (motorists, pedestrians, bicyclists, and transit users). Extensive use of Complete Streets guidelines, Smart growth principles and design elements, and Context-Sensitive Design throughout the TMP helps develop a transportation system aimed at addressing future transportation needs for the following networks: <ul style="list-style-type: none"> • Transit (bus and rail) • Cycling • Walking • Private vehicle movement • Goods vehicle movement • San Joaquin Council of Governments Regional Bicycle, 			

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>Pedestrian, and Safe Routes to School Master Plan: The Plan provides recommended bicycle and pedestrian projects for San Joaquin County and its seven cities including Tracy. The goals and recommendations are aimed to achieve.</p> <ul style="list-style-type: none"> • Increase bicycle and pedestrian mobility throughout San Joaquin County • Improve bicycle, pedestrian, and school access safety • Increase the number of commute, recreation, and utilitarian bicycle and pedestrian trips • Increase education and awareness of bicycling and walking in San Joaquin County • Address congestion near schools and on the regional Congestion Management Program network. 			
Displacement Prevention				
Program 1 – Housing Rehabilitation	The San Joaquin County Home Rehabilitation Program assists property owners in making residential building improvements. It offers low interest (two percent) amortized and deferred payment loans. The program is designed to make needed renovations affordable for low income homeowners (up to 80 percent AMI). San Joaquin	Ongoing during the planning period	Citywide, targeted outreach in lower resource, lower income neighborhoods, , including central northern and northeastern Tracy	Assist 15 lower income households in Tracy with the rehabilitation of their homes during the planning period.

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Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	County will make rehabilitation loans that, combined with the existing mortgage, do not exceed 110% of the value of the property.			
Program 11 – Property Acquisition and Improvement	The City will continue to identify and seek partnerships with organizations and the County in order to acquire, improve, and develop affordable housing.	<ul style="list-style-type: none"> • To Annually identify and seek partnerships with organizations and the County in order to acquire, improve, and develop affordable housing. • Annually pursue funding available at the state and federal levels for affordable housing development. 	Citywide	As funding permits, prioritize funding assistance to affordable housing projects that set aside units for seniors, persons with disabilities, and extremely low income households.
Program 9 – Provision of Adequate Sites and Monitoring of No Net Loss	<p>For the 6th cycle Housing Element, the City has been assigned a Regional Housing Needs Assessment (RHNA) of 8,830 units, including:</p> <ul style="list-style-type: none"> • Very Low Income: 2,994 units • Low Income: 1,879 units • Moderate Income: 1,175 units • Above Moderate: 2,782 units <p>In addition, the City has yet to complete the rezoning of 31.7 acres to meet the shortfall for the 5th cycle Housing Element RHNA. Combined, the City has a RHNA obligation of 9,330 units.</p> <p>The City is committed to ensuring that adequate sites at appropriate densities remain available during the planning period, as required by law. Specifically, the City already has pending projects that account for 3,133 units (118 very low income, 23 low income, and 2,972 above moderate income units). Projected ADUs also account for 330 units.</p>	<p>By July 2025, establish a formal procedure to monitor no-net-loss of capacity in meeting the City's RHNA and amend the Zoning Ordinance to provide for by-right approval for projects that include 20 percent of the units for lower income households.</p> <p>By-right approval is available to reuse sites effective December 31, 2023</p> <p>By-right approval is available to rezone sites effective upon rezoning</p> <ul style="list-style-type: none"> • By July 2025, complete rezoning of the sites identified in the sites inventory for rezoning. <p>In 2027, the City will evaluate the progress of pending projects counted toward the RHNA to</p>	Denoted rezone areas	Make the inventory of sites available to interested developers after adoption of the Housing Element

Appendix C. Affirmatively Furthering Fair Housing

Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>Overall, the City has a remaining RHNA obligation of 5,610 units (2,777 very low income, 1,757 low income, and 1,076 moderate income units).</p> <p>Under existing zoning, the City has realistic capacity for 1,016 lower income units and 754 moderate income units, creating a lower income shortfall of 3,857 units and a moderate-income shortfall of 421 units. The City's overall strategy is to accommodate the RHNA shortfall through increasing the permitted densities of existing multi-family zones, rezoning limited single-family and commercial areas to multi-family residential, and creating programs to facilitate increased ADU production in single-family zones. These strategies will allow the City to fully meet its housing needs for all income levels during the 6th Cycle Housing Element. Rezoning will meet all requirements pursuant to Government Code Section 65583.2, subdivisions (h) and (i).</p> <p>As required by law, the following types of sites are subject to by-right approval without discretionary review if the project includes 20 percent of the units as housing affordable to lower income households:</p> <ul style="list-style-type: none"> • Reuse Sites: Vacant sites that were used to meet the City's 4th and 5th cycles RHNA for lower income units; 	<p>ensure that development of housing units is occurring as projected. If it is determined after consultation with developers that the projects are not proceeding as planned and would result in a shortfall in RHNA sites, the City will identify alternative sites strategies (including potential rezoning) within six months.</p>		

Appendix C. Affirmatively Furthering Fair Housing

Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<ul style="list-style-type: none"> • Reuse Sites: Nonvacant sites that were used to meet the City's 5th cycle RHNA for lower income units; and • Rezone Sites: Sites to be rezoned to meet the 6th cycle RHNA for lower income units. <p>To ensure that the City complies with SB 166 (No Net Loss), the City will monitor the consumption of residential and mixed-use acreage to ensure an adequate inventory is available to meet the City's RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction in capacity below the residential capacity needed to accommodate the remaining need for lower and moderate income households, the City will identify and if necessary, rezone sufficient sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA.</p>			
Program 20 – Displacement Prevention	<p>The City will contact 100 households or landlords annually to provide information and resources regarding displacement prevention and income protection through the following efforts:</p> <ul style="list-style-type: none"> • By Q2 2025, coordinate with a qualified fair housing service provider to conduct a 	By Q2 2025	Citywide, targeted outreach in lower resource, lower income neighborhoods, including central northern and northeastern Tracy	100 Households or landlords annually. No net loss of affordable units.

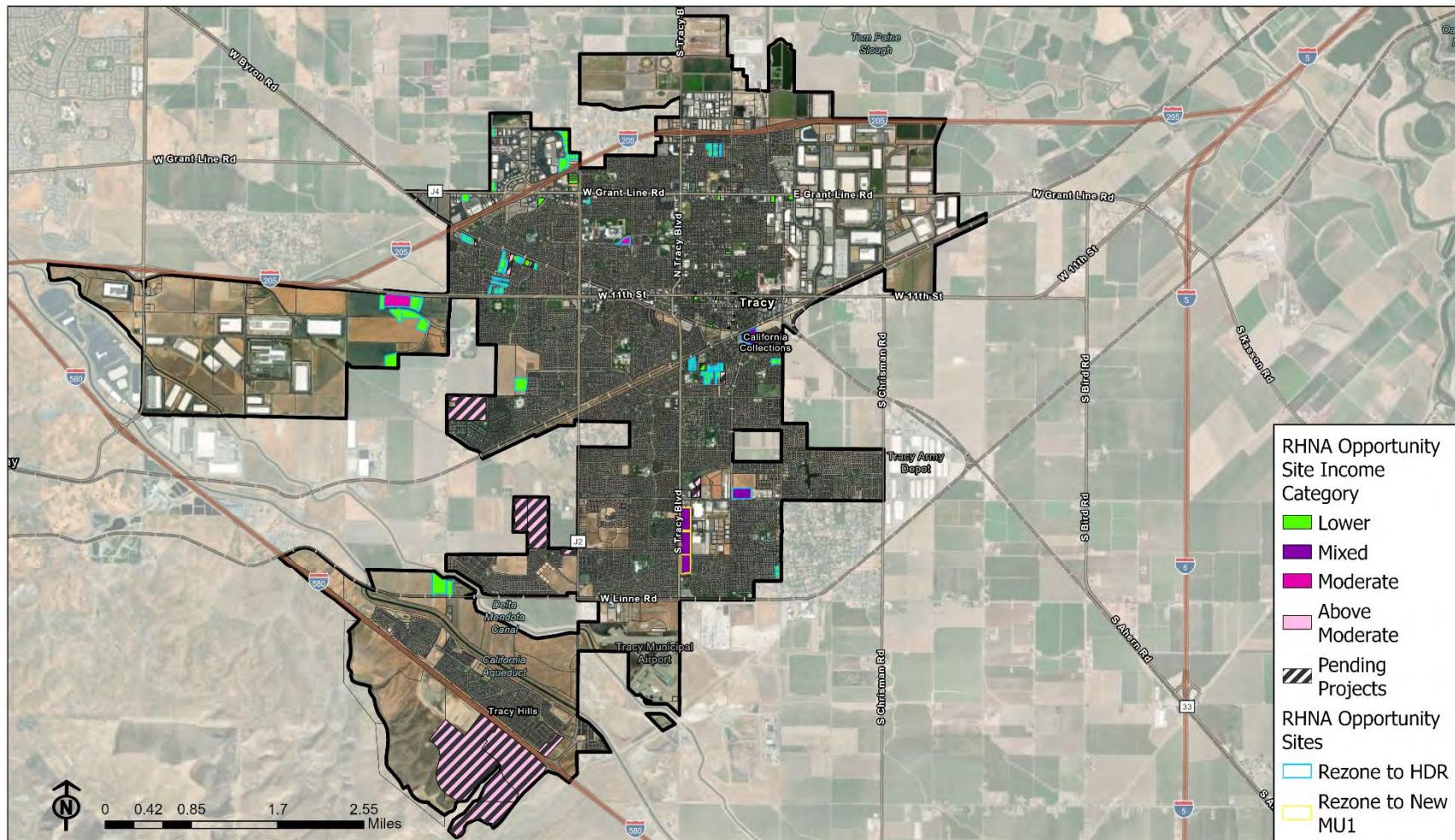
Appendix C. Affirmatively Furthering Fair Housing

Program	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>meeting/workshop to inform residents and landlords of sources of income protection and state rent control laws such as AB 1482. This may be done in coordination with the workshop the City's fair housing service provider.</p> <ul style="list-style-type: none"> Coordinate outreach efforts to inform landlords and tenants of recent changes to state law that prevent source of income discrimination, including allowance of housing choice vouchers (HCVs) to establish a renter's financial eligibility. Pursuant to SB 330, AB 1397, and State Density Bonus law, ensure a no net loss of housing units by income category when existing housing is demolished so that, at a minimum, an equivalent number of replacement units are created at the same level of affordability. The City's GMO also exempts permits for the replacement of demolished units. Objective: No net loss of affordable housing units 			

Appendix C. Affirmatively Furthering Fair Housing

Appendix D Sites Inventory

A. Sites Inventory Map



B. Sites Inventory List

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
20925050	SW of intersection of Capitol Park Dr and S Lammers Rd	95377	10.0		Office	PUD	HDR	20	35	0	184	114	0	298	Vacant	No	No	No
20947002	W of intersection of W 11th St and S Lammers Rd	95377	3.7			PUD	HDR	20	35	0	68	43	0	111	Vacant	No	No	No
20947003	W of intersection of W 11th St and S Lammers Rd	95377	19.3		Office	PUD	HDR	20	35	0	0	0	575	575	Vacant	No	No	No
20947004	W of intersection of W 11th St and S Lammers Rd	95377	6.7		Office	PUD	HDR	20	35	0	122	76	0	198	Vacant	No	No	No
20947005	NW of intersection of S Lammers Rd and Capitol Park Rd	95377	2.4			PUD	HDR	20	35	0	45	28	0	73	Vacant	No	No	No
20947009	W of intersection of S Lammers Rd and Capitol Park Rd	95377	6.1		Office	PUD	HDR	20	35	0	112	69	0	181	Vacant	No	No	No
20947010	W of intersection of S Lammers Rd and Capitol Park Rd	95377	7.4		Office	PUD	HDR	20	35	0	136	84	0	220	Vacant	No	No	No
20947011	Intersection of S Lammers Rd and Capitol Park Rd	95377	7.0		Office	PUD	HDR	20	35	0	129	80	0	209	Vacant	No	No	No
21205035	3200 Naglee Rd	95304	4.7		Commercial	I-205	HDR	20	35	0	86	53	0	139	Vacant	No	No	Yes
21205036	N of intersection of W Valley Mall and Naglee Rd	95304	2.2		Commercial	I-205	HDR	20	35	0	40	25	0	65	Vacant	No	No	Yes
21205037	Intersection of W Valley Mall and Naglee Rd	95304	1.9		Commercial	I-205	HDR	20	35	0	35	23	0	58	Vacant	No	No	Yes
21205038	3100 N Corral Hollow Rd	95304	1.0		Commercial	I-205	HDR	20	35	0	17	12	0	29	Vacant	No	No	Yes
21205039	W of intersection of W Valley Mall and Coral Hollow Rd	95304	0.9		Commercial	I-205	HDR	20	35	0	17	11	0	28	Vacant	No	No	Yes
21205040	Southside of W Valley Mall	95304	0.9		Commercial	I-205	HDR	20	35	0	17	11	0	28	Vacant	No	No	Yes
21205041	Intersection of Naglee Rd and W Valley Mall	95304	1.0		Commercial	I-205	HDR	20	35	0	17	12	0	29	Vacant	No	No	Yes
21205042	S of intersection of Naglee Rd and W Valley Mall	95304	2.1		Commercial	I-205	HDR	20	35	0	38	24	0	62	Vacant	No	No	Yes
21205052	3150 Naglee Rd	95304	4.9		Commercial	I-205	HDR	20	35	0	90	56	0	146	Commercial/Retail	No	No	Yes
21227020	Intersection of Power Rd and Auto Plaza Rd	95304	2.0		Commercial	PUD	HDR	20	35	0	37	23	0	60	Vacant	No	No	Yes
21229021	2855 W Grant Line Rd	95304	3.0		Commercial	PUD	HDR	20	35	0	54	34	0	88	Vacant	No	No	Yes

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
21402005	2805 N Corral Hollow Rd	95377	1.0		Office	GHC	-	20	35	1	9	7	0	16	Residential	No	No	Yes
21402006	2775 N Corral Hollow Rd	95377	1.0		Office	GHC	-	20	35	1	9	7	0	16	Residential	No	No	Yes
21402007	2755 N Corral Hollow Rd	95377	1.0		Office	GHC	-	20	35	0	10	7	0	17	Vacant	No	No	Yes
21402008	2705 N Corral Hollow Rd	95377	2.0		Office	GHC	-	20	35	0	21	14	0	35	Vacant	No	No	Yes
21402012	2115 W Grant Line Rd	95377	0.7		Office	GHC	-	20	35	0	7	5	0	12	Water District Property	No	No	Yes
21402038	W of intersection of N Corral Hollow Rd and W Grant Line Rd	95377	0.6		Office	GHC	-	20	35	0	6	4	0	10	Vacant	No	No	Yes
21443001	348 W Clover Rd	95376	0.8		Residential Medium	MDC	HDR	20	35	0	14	10	0	24	Residential	No	No	Yes
21443004	292 W Clover Rd	95376	1.9		Residential Medium	MDC	HDR	20	35	0	35	22	0	57	Residential	No	No	Yes
21443023	188 W Clover Rd	95376	1.0		Residential Medium	MDC	HDR	20	35	1	16	11	0	27	Residential	No	No	Yes
21443046	W of intersection of W Clover Rd and Briar Ln	95376	0.8		Residential Medium	MDC	HDR	20	35	0	14	9	0	23	Vacant	No	No	Yes
21443047	N of intersection of Dovenshire Dr and Marie Ave	95376	1.1		Residential Medium	MDC	HDR	20	35	0	19	12	0	31	Vacant	No	No	Yes
23202055	Intersection of Duncan Dr and Enyeart Rd	95376	0.8		Commercial	PUD	HDR	20	35	0	14	9	0	23	Vacant	No	No	Yes
23213010	Intersection of W Lowell Ave and Lincoln Blvd	95376	3.8		Public Facilities	LDR	HDR	20	35	0	700	430	9113	113	School District Property	No	No	Yes
23218022	1620 Behaven Ct	95376	0.8		Residential Low	LDR	HDR	20	35	0	14	9	0	23	Misc City Property	Yes	No	Yes
23310314	429 W Eleventh St	95376	0.2		Commercial	GHC	-	20	35	0	0	0	3	3	Vacant	No	No	Yes
23310315	435 W Eleventh St	95376	0.2		Commercial	GHC	-	20	35	0	0	0	3	3	Vacant	No	No	Yes
23315218	1500 Holly Dr	95376	0.8		Residential High	HDR	-	20	35	0	13	9	0	22	School District Property	No	No	Yes
23321009	210 W Grant Line Rd	95376	1.0		Commercial	GHC	-	20	35	0	10	7	0	17	Vacant	No	No	Yes
23336913	49 E Eleventh St	95376	0.1	A	Downtown	CBD	-	15	50	0	1	1	0	2	Commercial/Retail	No	No	Yes

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
23336914	47 E Eleventh St	95376	0.1	A	Downtown	CBD	-	15	50	0	1	1	0	2	Commercial/Retail	No	No	Yes
23336915	1121 El Portal St	95376	0.1	A	Downtown	CBD	-	15	50	0	1	1	0	2	Parking	No	No	Yes
23336916	35 E Eleventh St	95376	0.1	A	Downtown	CBD	-	15	50	0	1	2	0	3	Commercial/Retail	No	No	Yes
23336917	15 E Eleventh St	95376	0.1	A	Downtown	CBD	-	15	50	0	1	2	0	3	Commercial/Retail	No	No	Yes
23336918	3 E Eleventh St	95376	0.1	A	Downtown	CBD	-	15	50	0	1	2	0	3	Commercial/Retail	No	No	Yes
23336919	1120 Holly Dr	95376	0.2	A	Downtown	CBD	-	15	50	0	3	2	0	5	Parking	No	No	Yes
23346004	400 E Grant Line Rd	95376	1.8		Commercial	GHC	-	20	35	0	19	12	0	31	Vacant	No	No	Yes
23405003	1450 W Eleventh St	95376	0.2	B	Commercial	GHC	-	20	35	0	2	2	0	4	Vacant	No	No	Yes
23405004	1450 W Eleventh St	95376	0.3	B	Commercial	GHC	-	20	35	0	3	2	0	5	Vacant	No	No	Yes
23504012	430 W Eleventh St	95376	0.9		Commercial	GHC	-	20	35	0	9	6	0	15	Vacant	No	No	Yes
23504054	1017 West St	95376	0.7		Residential Medium	HDR	-	20	35	4	9	7	0	16	Residential	No	No	Yes
23505305	126 W Eleventh St	95376	0.1		Downtown A	CBD	-	15	50	0	1	2	0	3	Commercial/Retail	No	No	Yes
23505306	126 W Eleventh St	95376	0.2	C	Downtown	CBD	-	15	50	0	3	2	0	5	Commercial/Retail	No	No	Yes
23505307	104 W Eleventh St	95376	0.4	C	Downtown	CBD	-	15	50	0	6	5	0	11	Commercial/Retail	No	No	Yes
23506311	306 W Sixth St	95376	0.5	I	Downtown	CBD	-	15	50	0	7	5	0	12	Commercial/Retail	No	No	Yes
23506312	160 W Sixth St	95376	0.5	I	Downtown	CBD	-	15	50	0	7	5	0	12	Residential	No	No	Yes
23506316	Intersection of W 6th St and B St	95376	0.3	I	Downtown	CBD	-	15	50	0	4	3	0	7	Vacant	No	No	Yes
23510013	310 W Mt Diablo Av	95376	0.6		Residential Medium	MDR	HDR	20	35	0	9	7	0	16	Residential	No	No	Yes
23510015	302 W Mt Diablo Av	95376	1.0		Residential Medium	MDR	HDR	20	35	1	17	12	0	29	Residential	No	No	Yes
23510018	220 W Mt Diablo Av	95376	1.0		Residential Medium	MDR	HDR	20	35	0	18	12	0	30	Residential	No	No	Yes

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
23510024	130 W Mt Diablo Av	95376	1.0		Residential Medium	MDR	HDR	20	35	1	17	11	0	28	Residential	No	No	Yes
23510042	90 W Mt Diablo Av	95376	1.5		Residential Medium	MDR	HDR	20	35	1	27	17	0	44	Residential	No	No	Yes
23510071	280 W Mt Diablo Av	95376	1.3		Residential Medium	MDR	HDR	20	35	0	22	15	0	37	Residential	No	No	Yes
23510072	Intersection of Mt Oso Ave and Gianelli St	95376	0.7		Residential Medium	MDR	HDR	20	35	0	13	8	0	21	Residential	No	No	Yes
23510073	250 W Mt Diablo Av	95376	2.0		Residential Medium	MDR	HDR	20	35	1	35	22	0	57	Residential	No	No	Yes
23512001	205 E Third St	95376	2.9	D	Residential Medium	MDR	HDR	20	35	1	53	33	0	86	Residential	No	No	Yes
23515002	780 E Sixth St	95376	11.9		Downtown	M1	HDR	20	35	0	700	700	214354	354	Vacant	No	Yes	Yes
23512002	207 E Third St	95376	0.3	D	Residential Medium	MDR	HDR	20	35	0	5	4	0	9	Residential	No	No	Yes
23514009	Intersection of E 3rd St and E Mt Diablo Ave	95376	2.0		Commercial	NS	HDR	20	35	0	37	23	0	60	Vacant	No	No	Yes
23514010	Intersection of E Mt Diablo Ave and S MacArthur Dr	95376	1.2		Commercial	NS	HDR	20	35	0	22	14	0	36	Vacant	No	No	Yes
23516206	31 E Seventh St	95376	0.2	E	Downtown	CBD	-	15	50	0	3	3	0	6	Residential	No	No	Yes
23516207	23 E Seventh St	95376	0.1	E	Downtown	CBD	-	15	50	1	1	1	0	2	Residential	No	No	Yes
23516208	7 E Seventh St	95376	0.2	E	Downtown	CBD	-	15	50	0	3	2	0	5	Vacant	No	No	Yes
23516209	714 N Central Av	95376	0.2	E	Downtown	CBD	-	15	50	0	2	2	0	4	Commercial/Retail	No	No	Yes
23542005	550 W Fourth St	95376	0.3	E	Residential Medium	MDR	HDR	20	35	0	5	4	0	9	Church, Synagogue Or Temple	No	No	Yes
23542006	491 W Mt Diablo Av	95376	0.6		Residential Medium	MDR	HDR	20	35	0	10	7	0	17	Church, Synagogue Or Temple	No	No	Yes
23542007	524 W Fourth St	95376	0.5	E	Residential Medium	MDR	HDR	20	35	1	9	6	0	15	Residential	No	No	Yes

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
23542008	489 W Mt Diablo Av	95376	0.9		Residential Medium	MDR	HDR	20	35	0	15	10	0	25	Church, Synagogue Or Temple	No	No	Yes
23542009	510 W Fourth St	95376	0.8		Residential Medium	MDR	HDR	20	35	1	13	8	0	21	Residential	No	No	Yes
23542012	440 W Fourth St	95376	0.5		Residential Medium	MDR	HDR	20	35	0	9	7	0	16	Vacant	No	No	Yes
23542013	E of intersection of Diablo Pl and W Mt Diablo Ave	95376	0.5		Residential Medium	MDR	HDR	20	35	0	9	6	0	15	Vacant	No	No	Yes
23543006	251 W Mt Diablo Av	95376	0.9		Residential Medium	MDR	HDR	20	35	1	15	10	0	25	Residential	No	No	Yes
23543009	211 W Mt Diablo Av	95376	0.3	G	Residential Medium	MDR	HDR	20	35	0	4	4	0	8	Residential	No	No	Yes
23543011	201 W Mt Diablo Av	95376	0.3	G	Residential Medium	MDR	HDR	20	35	0	4	4	0	8	Residential	No	No	Yes
23543012	190 W South St	95376	0.2		Residential Medium	MDR	HDR	20	35	1	3	2	0	5	Residential	No	No	Yes
23543013	10009 W Mt Diablo Av	95376	0.4	H	Residential Medium	MDR	HDR	20	35	0	6	5	0	11	Residential	No	No	Yes
23543014	W of intersection of West St and W Mt Diablo Ave	95376	0.5	H	Residential Medium	MDR	HDR	20	35	0	9	7	0	16	Residential	No	No	Yes
23543016	W of intersection of C St and W Mt Diablo Ave	95376	0.5		Residential Medium	MDR	HDR	20	35	0	8	6	0	14	Residential	No	No	Yes
23543017	100 W South St	95376	0.6		Residential Medium	MDR	HDR	20	35	1	9	7	0	16	Residential	No	No	Yes
23543018	90 W South St	95376	0.6		Residential Medium	MDR	HDR	20	35	1	9	7	0	16	Residential	No	No	Yes
23543019	70 W South St	95376	1.1		Residential Medium	MDR	HDR	20	35	1	19	13	0	32	Residential	No	No	Yes
23805002	1381 Berg Av	95377	2.6		Residential Medium	MDR	HDR	20	35	0	47	29	0	76	Residential	No	No	Yes

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
23805003	2748 W Byron Rd	95377	1.0		Residential Medium	MDR	HDR	20	35	2	17	11	0	28	Residential	No	No	Yes
23805008	2718 W Byron Rd	95377	1.7		Residential Medium	MDR	HDR	20	35	1	29	19	0	48	Residential	No	No	Yes
23805014	2640 W Byron Rd	95377	1.1		Commercial	GHC	-	20	35	1	11	7	0	18	Mixed Use	No	No	Yes
23805015	2600 W Byron Rd	95377	1.1		Commercial	GHC	HDR	20	35	2	17	12	0	29	Residential	No	No	Yes
23805016	2590 W Byron Rd	95377	0.5		Residential Medium	MDR	HDR	20	35	2	8	5	0	13	Residential	No	No	Yes
23805017	2568 W Byron Rd	95377	0.5		Residential Medium	MDR	HDR	20	35	2	8	5	0	13	Residential	No	No	Yes
23805019	2520 W Byron Rd	95377	1.7		Commercial	GHC	-	20	35	0	18	12	0	30	Commercial/Retail	No	No	Yes
23805022	2430 W Byron Rd	95377	1.3		Residential Medium	MDR	HDR	20	35	0	24	16	0	40	Residential	No	No	Yes
23805023	1341 Berg Av	95377	1.1		Residential Medium	MDR	HDR	20	35	1	20	13	0	33	Residential	No	No	Yes
23806005	1240 Berg Av	95377	0.5		Residential Medium	MDR	HDR	20	35	1	8	6	0	14	Residential	No	No	Yes
23806009	1180 Berg Av	95377	1.0		Residential Medium	MDR	HDR	20	35	1	17	12	0	29	Residential	No	No	Yes
23806013	1150 Berg Av	95377	1.2		Residential Medium	MDR	HDR	20	35	1	22	14	0	36	Residential	No	No	Yes
23806018	2881 Fabian Rd	95377	1.1		Residential Medium	MDR	HDR	20	35	3	17	12	0	29	Residential	No	No	Yes
23806021	1191 Berg Av	95377	0.8		Residential Medium	MDR	HDR	20	35	2	13	9	0	22	Residential	No	No	Yes
23806024	1241 Berg Av	95377	0.8		Residential Medium	MDR	HDR	20	35	1	14	9	0	23	Residential	No	No	Yes
23806029	1121 Berg Av	95377	0.8		Residential Medium	MDR	HDR	20	35	1	14	9	0	23	Residential	No	No	Yes

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
23807004	3150 W Byron Rd	95377	0.6		Residential Medium	MDR	HDR	20	35	0	11	7	0	18	Residential	No	No	Yes
23807005	3160 W Byron Rd	95377	0.5		Residential Medium	MDR	HDR	20	35	1	7	5	0	12	Residential	No	No	Yes
23807006	3130 W Byron Rd	95377	1.1		Residential Medium	MDR	HDR	20	35	1	19	12	0	31	Residential	No	No	Yes
23807007	3110 W Byron Rd	95377	1.0		Residential Medium	MDR	HDR	20	35	1	17	12	0	29	Residential	No	No	Yes
23807008	3090 W Byron Rd	95377	1.1		Residential Medium	MDR	HDR	20	35	1	19	12	0	31	Residential	No	No	Yes
23819007	SW of intersection of Grant Line Rd and Joe Pombo Pkwy	95377	2.0		Commercial	GHC	-	20	35	1	20	13	0	33	Vacant	No	No	Yes
23860007	3140 W Grant Line Rd	95304	3.0		Commercial	PUD	HDR	20	35	0	55	34	0	89	Residential	No	No	Yes
24005037	Intersection of W Schulte Rd and Mabel Josephine Dr	95377	10.0		Urban Reserve 7	PUD	HDR	20	35	0	184	114	0	298	Vacant	No	No	Yes
24014027	4720 S Lammers Rd	95377	5.0		Industrial	M1-TH	HDR	20	35	1	91	57	0	148	Agricultural	No	No	Yes
24614001	26805 S Mac Arthur Dr	95376	10.0		Residential High	M1	HDR	20	35	0	59	59	180	298	Residential	No	Yes	Yes
24802017	Intersection of S Tracy Blvd and Gandy Dancer Dr	95377	14.3		Office	M1	New MU1	20	35	0	50	50	150	250	Residential	No	No	Yes
24803005	4800 S Tracy Bl	95377	14.3		Office	M1	New MU1	20	35	0	50	50	150	250	Residential	No	No	Yes
24803010	4100 S Tracy Bl	95377	11.8		Office	M1	New MU1	20	35	0	41	41	124	206	Residential	No	No	Yes
24865041	546 Glenbrook Dr	95377	1.0		Residential Low	PUD	HDR	20	35	1	17	12	0	29	Residential	No	No	Yes
24865042	545 Glenbrook Dr	95377	1.0		Residential Low	PUD	HDR	20	35	0	18	12	0	30	Residential	No	No	Yes
25027002	2301 N Mac Arthur Dr	95376	1.3		Industrial	GHC	-	20	35	0	13	9	0	22	Parking	No	No	Yes
25105008	27901 S Lammers Rd	95377	5.0		Residential Medium	MDR-TH	HDR	20	35	0	92	57	0	149	Agricultural	No	No	No
25105008	27901 S Lammers Rd	95377	10.0		Residential Medium	MDR-TH	HDR	20	35	0	184	114	0	298	Agricultural	No	No	No

APN	Address	Zip Code	Size (Acres)	Consolidated Sites	General Plan Designation (Current)	Current Zoning	Proposed Zoning	Min Density Proposed	Max Density Proposed	Existing Units	Very Low Income	Low Income	Moderate Income	Total Units	Existing Use	City Owned	5th Cycle	Infrastructure
25105009	28281 S Lammers Rd	95377	10.0		Residential Medium	MDR TH	HDR	20	35	0	184	114	0	298	Vacant	No	No	No

Appendix E Non-Vacant Sites Redevelopment Characteristics

A. Non-Vacant Sites Redevelopment Characteristics

<u>APN</u>	<u>Land Improvement Ratio</u> (> 0.45)	<u>Building Age</u> (>40 Years)	<u>Existing Use Similar to Trends</u>	<u>Building Footprint (<40%)</u>	<u>Adjacent to Services</u>
<u>21205052</u>	✓		✓		✓ ¹
<u>21402005</u>		✓	✓	✓	✓
<u>21402006</u>		✓	✓	✓	✓
<u>21402007</u>	✓ ³	✓	✓	✓	✓
<u>21443023</u>	✓	✓	✓	✓	✓
<u>23504054</u>		✓	✓	✓	✓
<u>23510018</u>	✓ ³	✓	✓	✓	✓
<u>23510024</u>		✓	✓	✓	✓
<u>23510042</u>	✓ ³	✓	✓	✓	✓
<u>23510073</u>	✓	✓	✓	✓	✓
<u>23512001</u>		✓	✓	✓	✓ ¹
<u>23516207</u>	✓	✓	✓	✓	✓
<u>23542007</u>	✓	✓	✓		✓
<u>23542009</u>	✓ ³	✓	✓	✓	✓
<u>23543006</u>	✓	✓	✓	✓	✓
<u>23543017</u>		✓	✓	✓	✓
<u>23543018</u>		✓	✓	✓	✓
<u>23543019</u>		✓	✓	✓	✓
<u>23805003</u>		✓	✓	✓	✓ ¹
<u>23805008</u>	✓	✓	✓	✓	✓ ¹
<u>23805015</u>	✓	✓	✓	✓	✓ ¹
<u>23805016</u>	✓	✓	✓	✓	✓ ¹
<u>23805017</u>	✓	✓	✓	✓	✓ ¹
<u>23805022</u>	✓	✓	✓	✓	✓ ¹
<u>23805023</u>	✓	✓	✓	✓	✓ ¹
<u>23807005</u>		✓	✓	✓	✓
<u>23807006</u>	✓		✓	✓	● ²
<u>23807007</u>	✓		✓	✓	● ²
<u>23807008</u>	✓	✓	✓	✓	● ²

1. Within a mile of a daycare, grocery store, or school, but not all three.

2. Not within a mile of a daycare, grocery store, or school, but all within 2 miles.

3. No actual Land Improvement Ratio was able to be calculated by the County Assessor because parcel was designated as vacant. However, through the sites inventory process, it was identified as an underutilized non-vacant parcel (small structure on large lot which would yield a high land improvement ratio).