

**Table D-9: Fair Housing Issues and Contributing Factors**

Priority Level	Fair Housing Issue	Description	Contributing Factor(s)	Meaningful Actions	Geographic Targeting	2023-2031 Metrics and Timing
High	Enforcement	Surveys indicate that tenants' rights education is among the services needed most in Stanislaus County. In Turlock, linguistically isolated households where adults have difficulty speaking English tend also to be concentrated in areas with the highest rates of renters, rent burdened households, and low/moderate income residents who may be at greater risk of eviction or have greater need for landlord-tenant mediation services.	<ul style="list-style-type: none"> <li>Lack of awareness of tenant rights</li> <li>Linguistic isolation</li> </ul>	<ul style="list-style-type: none"> <li>Program 5-A Fair Housing Information</li> <li>Program 5-B Mediation and Enforcement</li> <li>Program 5-C Anti-Discrimination Training</li> </ul>	Citywide and in DACs	<ul style="list-style-type: none"> <li>Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)</li> <li>Assist 30 households during the planning period (Program 5-B)</li> <li>Increase awareness of fair housing practices among small, independent real estate professionals and lenders over the planning period (Program 5-C)</li> </ul>
Medium	Enforcement	Loan denial rates are 7-10 percent higher for people of color than for White applicants. Between 2018-21, Black applicants had the highest loan denial rates, followed by Hispanic or Latino applicants. White applicants consistently experienced lower than average loan denial rates.	<ul style="list-style-type: none"> <li>Financial literacy of affected groups</li> <li>Lending discrimination</li> </ul>	<ul style="list-style-type: none"> <li>Program 5-A Fair Housing Information</li> <li>Program 5-C Anti-Discrimination Training</li> </ul>	Citywide	<ul style="list-style-type: none"> <li>Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)</li> <li>Increase awareness of fair housing practices among lenders over the planning period (Program 5-C)</li> <li>Percent change in denial rates</li> </ul>
High	Enforcement	Fair housing complaints disproportionately involve small, independent landlords who represent a large share of rental property owners. Disability was the primary basis for fair housing complaints in Turlock between 2014 and 2019, accounting for more than 70 percent of all complaints. Race and familial status each accounted for approximately 12 percent of complaints.	<ul style="list-style-type: none"> <li>Lack of training/awareness of fair housing law</li> <li>Lack of awareness of tenant rights</li> </ul>	<ul style="list-style-type: none"> <li>Program 5-A Fair Housing Information</li> <li>Program 5-B Mediation and Enforcement</li> <li>Program 5-C Anti-Discrimination Training</li> <li>Program 4-B Support for Individuals with Disabilities</li> </ul>	Citywide	<ul style="list-style-type: none"> <li>Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)</li> <li>Assist 30 households during the planning period (Program 5-B)</li> <li>Increase awareness of fair housing practices among small, independent real estate professionals and lenders over the planning period (Program 5-C)</li> <li>Increase in participation in DRAIL programs and services by Turlock residents (Program 4-B)</li> </ul>
High	Segregation and Integration	There is a discernable pattern of segregation by income and race in Turlock. Neighborhoods in the north and east have higher incomes and higher a higher share of White households, while neighborhoods in the center and southwest have lower incomes and a higher share of non-White residents.	<ul style="list-style-type: none"> <li>Historical settlement patterns in Turlock</li> <li>Neighborhoods in the north and east are predominantly comprised of single-family housing, often not affordable for disadvantaged groups.</li> </ul>	<p><u>Expand housing choice and housing mobility in north and east of Turlock</u></p> <ul style="list-style-type: none"> <li>Program I-E ADU/JADU Awareness</li> <li>Program I-F <del>Pre-Approved ADU Plans</del> <u>Congregational Overlay</u></li> <li><del>Program I-G Congregational Overlay</del></li> <li>Program I-C SB9 Ordinance</li> <li>Program I-D Small Lot Subdivision Ordinance</li> <li>Program 5-D Disavowal of Racially Restrictive Covenants</li> </ul>	<u>High and Highest Resource neighborhoods in northeast Turlock</u>	<p><u>Expand housing choice and housing mobility in north and east of Turlock</u></p> <ul style="list-style-type: none"> <li>Issue 15 ADU/JADU construction permits annually over the planning period <u>with a focus on High and Highest Resource neighborhoods</u> (Program I-E)</li> <li><u>Adopt the overlay by Q4 2026. Target 6 construction of 40-50 new ADU/JADUs in Turlock annually lower income units in High and Highest Resource neighborhoods in Turlock</u> over the planning period (Program I-F)</li> <li><del>Adopt the overlay by Q4 2026; increase the supply of affordable housing in Turlock, with a focus on High and Highest Resource neighborhoods (Program I-G)</del></li> <li>Adopt the SB 9 Ordinance by Q1 <del>2028</del> <u>2026</u>; conduct community outreach bi-annually following adoption of the ordinance, with annual progress reporting to HCD through APRs (Program I-C)</li> <li>Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock <u>targeting</u></li> </ul>

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				<p>Prevent Displacement of Existing LMI Households</p> <ul style="list-style-type: none"> <li>Program I-B <b>Rezoning to Accommodate RHNA Shortfall/Workforce Housing Overlay</b></li> <li>Program 5-A Fair Housing Information</li> <li>Program 5-B Mediation and Enforcement</li> <li>Program 3-H Anti-Displacement Strategy</li> <li>Program 6-D Development and Replacement Unit</li> </ul>	Center and southwest Turlock	<p><b>100 new homes for Moderate income households by 2031 with half in High and Highest Resource neighborhoods</b> (Program I-D)</p> <ul style="list-style-type: none"> <li>Post information to City website and send e-newsletter by end of Q3 2025; annually each year of the planning period thereafter, Participation of 100 homeowners in County program by 2031 (Program 5-D)</li> </ul> <p>Prevent Displacement of Existing LMI Households</p> <ul style="list-style-type: none"> <li>Adopt <b>amendments creating the C-RMU base zoning district by end of Q3 2026 concurrent with the Housing Element the Workforce Housing Overlay by January 31, 2025</b>; 626 moderate and 1,544 lower income RHNA units by 2030 (Program I-B)</li> <li>Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)</li> <li>Assist 30 households during the planning period (Program 5-B)</li> <li>Prepare anti-displacement strategy by end of Q4 2025, being implementation in Q1 2026; minimize or prevent displacement of at-risk residents <b>citywide and in tracts shown on Map D-24; 194 housing units</b> (Program 3-H)</li> <li>Beginning in Q4 2024; protection of existing housing (Program 6-D)</li> </ul>
High	Segregation and Integration	LMI households are concentrated in Low and Moderate Resource Areas north and west of downtown. More than 20 percent of households in these areas are headed by a single mother with children, which represents an over concentration. One of these tracts (38.02) is designated as an area of High Poverty and Segregation by the State and has the highest rate of overcrowding in Turlock.	<ul style="list-style-type: none"> <li>Historical settlement patterns</li> <li>Lack of housing options for LMI households in High Resource areas</li> <li>Income and educational attainment levels</li> </ul>	<ul style="list-style-type: none"> <li>Program I-E ADU/JADU Awareness</li> <li>Program I-<b>FG</b> Congregational Overlay</li> <li>Program I-C SB9 Ordinance</li> <li>Program I-D Small Lot Subdivision Ordinance</li> </ul>	<b>High and Highest Resource neighborhoods DACs with more than 50% LMI households (tracts 38.02; 38.03; 38.04; 39.04; 39.08)</b>	<ul style="list-style-type: none"> <li>Issue 15 ADU/JADU construction permits annually over the planning period <b>with a focus on High and Highest Resource neighborhoods</b> (Program I-E)</li> <li>Adopt the overlay by Q4 2026; <b>target construction of 50 new lower income units increase the supply of affordable housing in Turlock, with a focus on High and Highest Resource neighborhoods over the planning period</b> (Program I-<b>FG</b>)</li> <li>Adopt the SB 9 Ordinance by Q1 2026; conduct community outreach bi-annually following adoption of the ordinance, with annual progress reporting to HCD through APRs (Program I-C)</li> <li>Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock, <b>targeting 100 new homes for Moderate income households by 2031 with half in High and Highest Resource neighborhoods</b> (Program I-D)</li> </ul>
High	Access to Opportunity	About 85 percent of the students served in western tracts are economically disadvantaged, meaning their families are below the poverty line, and 76 percent are minority. Students of color in Turlock received lower test scores in both math and English than non-Hispanic White students. The proportion of students who meet or exceed standards in English Language Arts or math in Turlock is higher than in Stanislaus County, but lower than in the State.	<ul style="list-style-type: none"> <li>Income and educational attainment levels</li> <li>Lower performance scores</li> </ul>	<p><b>Enhance Income and Educational Attainment</b></p> <ul style="list-style-type: none"> <li>Workforce Development Initiatives (Program 5-F)</li> </ul> <p><b>Raise Performance Scores</b></p> <ul style="list-style-type: none"> <li>Chatom Union School District (CUSD)'s instructional support programs that include homework support and academic intervention including math and reading</li> <li>TUSD's Family Resource Center provides resources, programs, and services to diverse Turlock families, that include school readiness programs for students in need</li> </ul>	Citywide; southwest Turlock	<ul style="list-style-type: none"> <li>Post materials by end of Q3 2025, updating periodically throughout the planning period; coordinate annually with SCWD and non-profit partners to track participation rates, <b>targeting a 15 percent increase in the annual number of program participants above the 2025 baseline rate over the planning period a 10 percent decrease in unemployment compared to 2023 levels among with a focus on low income single women by 2031</b> (Program 5-F)</li> <li>Higher performance scores in English and Mathematics throughout Turlock during the planning period</li> </ul>

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High	Access to Opportunity	Census tracts west of the BNSF railroad tracks have environmental opportunity scores that rank among the worst 25 percent statewide. These areas also have higher shares of low income and non-White households than the rest of Turlock. A primary cause of the low environmental opportunity scores is exposure to air pollution and diesel particulate matter (DPM), which can disproportionately affect low income residents who may live in lesser quality housing with inadequate insulation and ventilation; have less access to quality healthcare (or be uninsured); and not be able to afford to live in other neighborhoods.	<ul style="list-style-type: none"> <li>Historical settlement patterns</li> <li>Exposure to air pollution and DPM</li> <li>Lower tree canopy coverage</li> <li>Access to healthcare and health insurance coverage</li> </ul>	<ul style="list-style-type: none"> <li>Program 3-A Home Rehabilitation Loan Program</li> <li>Program 3-B Acquisition and Rehabilitation of Property for Affordable Housing</li> <li>Program 3-C Neighborhood Clean Up Programs</li> <li>Program 3-E Place-Based Community Improvement Efforts</li> </ul>	DACs west of the BNSF tracks	<ul style="list-style-type: none"> <li>Provide 10 loans annually throughout the planning period <b>targeting DACs west of the BNSF tracks</b> (Program 3-A)</li> <li>Provide 14 loans annually throughout the planning period <b>targeting DACs west of the BNSF tracks</b> (Program 3-B)</li> <li>Operation of various projects <b>annually to enhance neighborhood character and reduce code enforcement actions by at least 25 percent</b>; throughout the 2023-2031 planning period (Program 3-C)</li> <li>Completion of construction of the Columbia Pool, pavement and rehabilitation of various street segments, and re-surfacing and re-striping of the multi-purpose court at Columbia Park; completion of construction by end of Q4 2027 (Program 3-E)</li> </ul>
High	Displacement	Three tracts in Turlock have elevated risk of displacement (38.02, 39.06, and 39.08). All have among the highest shares of renters, low-income households, and non-White residents. Two are DACs and one is classified as High Poverty and Segregation.	<ul style="list-style-type: none"> <li>Turlock home values have increased by 124 percent since 2011, with value of smaller units (1 and 2-bedrooms) seeing the steepest increases, indicating need for smaller units</li> </ul>	<ul style="list-style-type: none"> <li>Program 1-B <b>Rezoning to Accommodate RHNA Shortfall/Workforce Housing Overlay</b></li> <li>Program 3-A Home Rehabilitation Loan Program</li> <li>Program 3-B Acquisition and Rehabilitation of Property for Affordable Housing</li> <li>Program 5-A Fair Housing Information</li> <li>Program 5-B Mediation and Enforcement</li> <li>Program 3-H Anti-Displacement Strategy</li> <li>Program 6-D Development and Replacement Unit Requirements</li> </ul>	DACs with elevated risk of displacement (Tracts 38.02, 39.06, and 39.08)	<ul style="list-style-type: none"> <li>Adopt <b>amendments creating the C-RMU base zoning district concurrent with the Housing Element by end of Q3 2026 the Workforce Housing Overlay by January 31, 2025</b>; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B)</li> <li>Provide 10 loans annually throughout the planning period <b>targeting DACs west of the BNSF tracks</b> (Program 3-A)</li> <li>Provide 14 loans annually throughout the planning period <b>targeting DACs west of the BNSF tracks</b> (Program 3-B)</li> <li>Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)</li> <li>Assist 30 households during the planning period (Program 5-B)</li> <li>Prepare anti-displacement strategy by end of Q4 <b>2026</b>, being implementation in Q1 <b>2027</b>; minimize or prevent displacement of at-risk residents <b>citywide and in tracts shown on Map D-24: 194 housing units</b> (Program 3-H)</li> <li>Beginning in Q4 2024; protection of existing housing (Program 6-D)</li> </ul>
High	Disproportionate Needs	<b>Cost Burden</b> Renters are disproportionately affected by housing cost burden: more than 50 percent of renters in Turlock devote more than 30 percent of their income to housing costs, putting them at risk of falling behind on rent and facing eviction. Tract 38.02, designated as High Poverty and Segregation, has the highest rate of cost burdened homeowners.	<ul style="list-style-type: none"> <li>Turlock home values have increased by 124 percent since 2011, with value of smaller units (1 and 2-bedrooms) seeing the steepest increases, indicating need for smaller units</li> </ul>	<ul style="list-style-type: none"> <li>Program 1-B <b>Rezoning to Accommodate RHNA Shortfall/Workforce Housing Overlay</b></li> <li>Program 1-C SB9 Ordinance</li> <li>Program 1-D Small Lot Subdivision Ordinance</li> <li>Program 1-E ADU/JADU Awareness</li> <li>Program 1-F <b>Congregational Overlay/Pre-Approved ADU Plans</b></li> <li>Program 1-G <b>Congregational Overlay</b></li> </ul>	<b>High and Highest Resource neighborhoods in northeast</b>	<ul style="list-style-type: none"> <li>Adopt <b>amendments creating the C-RMU base zoning district concurrent with the Housing Element by end of Q3 2026 the Workforce Housing Overlay by January 31, 2025</b>; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B)</li> <li>Adopt the SB 9 Ordinance by Q1 <b>2026</b>; conduct community outreach bi-annually following adoption of the ordinance, with annual progress reporting to HCD through APRs (Program 1-C)</li> <li>Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock, <b>targeting 100 new homes for Moderate income households by 2031 with half in High and Highest Resource neighborhoods</b> (Program 1-D)</li> </ul>

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				<ul style="list-style-type: none"> <li>• Program 5-A Fair Housing Information</li> <li>• Program 5-B Mediation and Enforcement</li> <li>• Program 3-H Anti-Displacement Strategy</li> <li>• Program 6-D Development and Replacement Unit Requirements</li> </ul>	Citywide	<ul style="list-style-type: none"> <li>• Issue 15 ADU/JADU construction permits annually over the planning period <u>with a focus on High and Highest Resource neighborhoods</u> (Program 1-E)</li> <li>• <u>Adopt the overlay by Q4 2026; Target C</u> construction of <u>50 lower income units in High and Highest Resource neighborhoods in Turlock</u> <u>10 new ADU/JADUs in Turlock annually</u> over the planning period (Program 1-F)</li> <li>• <del>Adopt the overlay by Q4 2026; increase the supply of affordable housing in Turlock, with a focus on High and Highest Resource neighborhoods (Program 1-G)</del></li> <li>• Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)</li> <li>• Assist 30 households during the planning period (Program 5-B)</li> <li>• Prepare anti-displacement strategy by end of Q4 <u>2026</u>, being implementation in Q1 <u>2027</u>; minimize or prevent displacement of at-risk residents <u>citywide and in tracts shown on Map D-16: 194 housing units</u> (Program 3-H)</li> <li>• Beginning in Q4 2024; protection of existing housing (Program 6-D)</li> </ul>
High	Disproportionate Needs	<p><u>There are disparities between DACs and non-DACs in terms of park acreage and sidewalk conditions. DACs have a slightly lower ratio of parkland per thousand residents than the City as a whole and two centrally located DAC tracts (6099003609 and 6099003906) do not contain a park. Additionally, staff rated sidewalk conditions in three DAC tracts as fair/good and in two other DACs tracts as fair/poor.</u></p>	<p><u>Non-DAC tracts contain relatively newer developed subdivisions and accordingly, conditions in those areas are better than in older parts of town where DACs are located.</u></p>	<ul style="list-style-type: none"> <li>• <u>Program 3-E Place Based Strategies</u></li> <li>• <u>Program 3-I Sidewalk Repair Assistance Program</u></li> </ul>	<p><u>DACs, particularly tracts 6099003609 and 6099003906 as well as tracts southwest of the BNSF tracks</u></p>	<ul style="list-style-type: none"> <li>• <u>Incentivize provision of privately-owned, publicly accessible open spaces in new multifamily and mixed use development in DACs (Program 3-E)</u></li> <li>• <u>Provide grants for sidewalk repairs in DACs and simplify encroachment permitting and administrative steps (Program 3-I)</u></li> </ul>