

Appendix D

Assessment of Fair Housing



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D Assessment of Fair Housing

California Government Code Section 65583 (c)(5) requires cities to affirmatively further fair housing opportunities and promote housing throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by state and federal fair housing and planning law. AB 686 (2019) defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. Section 65583 (c)(10) (A) requires the Housing Element to include an assessment of fair housing 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 available data and knowledge to identify integration and segregation patterns, disparities in access to opportunities, and disproportionate needs, and displacement,
- An assessment of contributing factors, including local and regional historical origins and current policies and practices,
- Identification of fair housing goals and actions, giving highest priority to factors that limit or deny fair housing choice or access to opportunity; and
- Strategies and actions to implement priorities and goals.

CITY OVERVIEW

Turlock is in the San Joaquin Valley, comprised of Stanislaus, Merced, and Fresno counties, and is part of the Central Valley Region encompassing 19 counties from Redding to Bakersfield. The Valley is predominantly rural with a few more densely populated urban centers including Turlock, Modesto to the northwest and Merced to the southeast of Turlock. Turlock is the second-largest city in Stanislaus County with an estimated population of 71,924 as of this writing compared with 217,484 for Modesto.¹ The population in both cities has declined since the 2020 Census, a reduction of 1.06 percent in Turlock and 0.54 percent in Modesto. The U.S. Department of Housing & Urban Development (HUD) requires a regional analysis as a part of assessing fair housing to help identify fair housing issues in a broader context, which allows jurisdictions to address regional issues with scale-appropriate solutions. To that end, this assessment contextualizes its analysis of Turlock with an analysis of the county and the broader Central Valley regions’ fair housing patterns and trends when applicable.

¹ World Population Review <https://worldpopulationreview.com/us-cities/turlock-ca-population>

PUBLIC OUTREACH

This assessment considers feedback from the public received during the development of the Regional Analysis of Impediments to Fair Housing Choice, Fiscal Year 2020-2025, prepared by Stanislaus County for the Stanislaus Urban County and the Cities of Turlock and Modesto in conjunction with the preparation of their HUD-mandated Consolidated Plan. The outreach process in Turlock included a meeting with the Turlock Community Collaborative on February 18, 2020, and a public hearing before the Turlock City Council on May 12, 2020. The Community Collaborative is a group of local nonprofit organizations, government agencies, businesses, and cities founded in 2002 to provide information and support to nonprofit agencies working in the community. The Collaborative's members include several organizations active in fair housing issues such as California Rural Legal Assistance, Community Housing and Shelter Services, Housing and Economic Rights Advocates, Project Sentinel, and the Stanislaus County Mediation Center.²

As required by HUD, the Turlock/Stanslaus County HOME Consortium consulted with organizations that address fair housing, civil rights, and the needs of persons with disabilities during preparation of the 2023 HOME-ARP Allocation Plan including Project Sentinel, California Rural Legal Assistance, Community Housing and Shelter Services, The Consortium held two facilitated virtual consultation sessions in December 2022 including one that focused on fair housing with the Disability Resources Agency for Independent Living and the LGBTQ Collaborative. The Consortium also reached out to other stakeholders at a meeting held by the Stanislaus Community System of Care governance body in January 2023 and encouraged all consultation session participants to complete an on-line survey. Participants included a variety of organizations serving persons experiencing homelessness and at risk of homelessness, persons fleeing or attempting to flee violence, and other populations at risk if housing instability.³

DATA/RESOURCES CONSULTED

Many of the data sources used to prepare Turlock's housing needs assessment (Appendix B) also provided information to support this evaluation of fair housing in the city. Primary data sources include AFFH Mapping and Data Resources provided by the State Department of Housing and Community Development (HCD), the 2020 United States Census, the 2016-2020 American Community Survey, the Stanislaus Urban County and City of Turlock Consortium Consolidated Plan, Fiscal Year 2020-2025, and the following:

- Taking Stock: A Comprehensive Housing Report for the San Joaquin Valley in 2022, Regional Early Action Planning (REAP), Data Profile
- City of Turlock 2015-2023 Housing Element
- Stanislaus County Regional Analysis of Impediments to Fair Housing Choice (AI)
- California Tax Credit Allocation Committee TCAC/HCD Opportunity Area Maps
- Home Mortgage Disclosure Act Data, 2007-2017
- American Communities Project: Diversity and Disparities, Brown University⁴
- Urban Displacement Project, UC Berkeley⁵

² Turlock Community Collaborative, 2023 Member Directory, 2023.

³ Turlock/Stanslaus County HOME Consortium, HOME-ARP Allocation Plan, submitted to HUD March 2023.

⁴ Brown University, American Communities Project, 2022. **Available Available:**
<https://www.brown.edu/academics/spatial-structures-in-social-sciences/diversity-and-disparities>

⁵ Chapple, K., & Thomas, T., and Zuk, M, 2021. Urban Displacement Project, Berkeley, CA: Urban Displacement Project.

D.1 Fair Housing Resources

Fair housing services are an essential component of proactive efforts to further fair housing. They help to ensure that a variety of housing options are accessible to State and federally protected groups, including those based on race, color, gender, religion, national origin, familial status, disability, age, marital status, ancestry, source of income, sexual orientation, genetic information, or other arbitrary factors. Fair housing services also help Turlock residents understand and protect their right to access housing. In addition to the HUD Office of Fair Housing and Equal Opportunity, California Department of Fair Employment and Housing (DFEH), and the California Department of Consumer Affairs, local agencies and organizations providing services to Turlock residents and those seeking housing in the community include:

- Community Housing and Shelter Services (CHHS)
- City of Turlock Housing Services
- California Rural Legal Assistance
- Project Sentinel and Stanislaus County Mediation Center
- Families de la Raza Unida de Turlock
- Stanislaus County Bar Association Lawyers Referral Service
- Stanislaus County Regional Housing Authority
- Stanislaus County Family Justice Center

FAIR HOUSING SERVICES, ENFORCEMENT AND OUTREACH CAPACITY

Fair housing enforcement and outreach capacity refers to the ability of a city and the fair housing agencies and organizations serving the community to provide information about fair housing rights and responsibilities to community members including residents and housing providers. Outreach capacity includes the ability ~~addressto address~~ compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. The US Department of Housing and Urban Development (HUD) has several programs that fund State and local agencies to conduct fair housing services and activities, including the Fair Housing Assistance Program (FHAP) and the Fair Housing Initiatives Program (FHIP). These groups communicate with housing providers, conduct investigations, perform testing to help determine if someone has experienced discrimination, and provide information and assistance. The FHAP funds the California Department of Fair Employment and Housing (DFEH) to enforce Federal fair housing laws in California. The closest FHIP to Turlock is Project Sentinel, a non-governmental organization (NGO) based in Modesto that HUD funds to provide education, outreach, and enforcement. Housing discrimination complaints can be filed directly with HUD, with the State Department of Fair Employment and Housing, or with Fair Project Sentinel.

Housing discrimination complaints are one method to evaluate the extent of fair housing issues in a community. Turlock contracts with Project Sentinel to provide fair housing and tenant-landlord counseling services. Project Sentinel, a nonprofit organization offering a variety of fair housing resources and services in much of Northern California, is the primary organization providing individuals in Turlock and the rest of Stanislaus County with assistance for filing complaints about violations of fair housing law with state and national agencies. The organization also provides outreach and education to housing providers, property managers, and service providers, dispute resolution, and housing counseling. Resources are offered in English, Spanish, Vietnamese, and Chinese. Project Sentinel has an office in Modesto where Turlock

residents can obtain assistance with housing problems such as discrimination, mortgage foreclosure and delinquency, rental issues including repairs, deposits, privacy, dispute resolution, home buyer education, post purchase education and reverse mortgages. The city also provides information about Project Sentinel's programs on a page at the Housing Programs website (<https://www.cityofturlock.org/housingprograms/fairhousing/>) with downloadable copies of some informational materials including materials produced by HUD and State agencies.

Annually, Project Sentinel processes over 10,000 initial contacts; handles over 400 housing discrimination complaints and over 1,700 landlord tenant and community dispute cases; counsels over 750 homeowners; and provides monthly workshops on housing topics to its service area. During Fiscal Year 2019-2020, Project Sentinel received 545 calls for fair housing information within the Stanislaus Urban County area resulting in a total of 12 fair housing cases and 32 tenant/landlord cases handled by the agency.

Additionally, California Rural Legal Assistance (CRLA) has 17 offices statewide including headquarters in Modesto. CRLA operates a state-wide Fair Housing and Foreclosure Prevention Program under guidance of HUD that assists victims of housing discrimination. They focus on the needs of farmworker communities, those living in unincorporated areas, and other underserved areas of California that have been subject to segregation and historic patterns of discriminatory housing and lending practices.

Turlock collaborates with the Stanislaus County, the city of Modesto, and the Stanislaus Regional Housing Authority that receive entitlement funding from HUD. One of the requirements for maintaining eligibility for federally funded programs such as the Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Solutions Grant programs, and other state and local programs is to "actively further fair housing choice" through:

- Completion of an Analysis of Impediments to Fair Housing Choice (AI),
- Actions to eliminate identified impediments; and
- Maintenance of fair housing records

The 2024-2025 Annual Action Plan the City of Turlock submitted to HUD as the application for funding from the CDBG program and HOME Consortium funds, commits Turlock to funding organizations, including We Care Program, United Samaritans, Center for Human Services, Healthy Alternatives to Violent Environments (HAVEN) to provide supportive services to homeless and low-income populations, specifically to assist in fair housing education and counseling on housing discrimination.⁶ For the 2024-2025 financial year, the City of Turlock committed to providing fair housing support services for 30 households with CDBG funds.

Fair housing complaints are not the only indication of fair housing conditions, but data from Stanislaus Regional Housing Authority, along with records published by the State Department of Fair Employment and Housing (DFEH), provide a basis for viewing Turlock in a broader context. The 2020-2025 Analysis of Impediments (AI) reports that between 2014 and 2019 complaints regarding housing in Turlock included 30 related to disability, five complaints related to race, and five related to familial status with fewer than five complaints filed in cases related to national origin, gender/sex, arbitrary reasons, and age. Relative to Stanislaus County, Modesto had a significant number of complaints (165) compared to other jurisdictions in the County. This may be because Project Sentinel has a physical office in Modesto but could also be due to the amount of outreach or advertising to the public in Modesto, partnerships with other organizations,

⁶ City of Turlock Annual Action Plan For CDBG funds & Turlock/Stanislaus Urban County HOME Consortium funds Fiscal Year 2024-2025. Available: <https://www.cityofturlock.org/pdf/hppr.asp?id=45>

or the number of fair housing violations occurring. The larger number may therefore reflect successful community outreach as opposed to a greater prevalence of housing discrimination.

The 2020 AI reported that as of 2016, though many people who speak a language other than English at home are bilingual, there are also residents who report speaking English “less than very well” in all parts of the County. More than 20 percent of residents in Waterford, Newman, Ceres, and the Unincorporated County report speaking English less than “very well”. While Spanish is the predominant language of these residents, Turlock also has at least five percent of residents who speak another language and speak English less than “very well”. Linguistically isolated households are located in areas of Turlock west of SR99, southwest of downtown, both west and south of CSU Stanislaus. Communication regarding fair housing issues and solutions to closing any findings should consider there might be language barrier.

FAIR HOUSING COMPLIANCE

California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) FEHA Regulations (California Code of Regulations (CCR), title 2, sections 12005-12271) Government Code section 65008 covers actions a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.

HCD guidance on Affirmatively Furthering Fair Housing requires an analysis of compliance with existing fair housing laws and regulations. Examples of State fair housing laws include the California Fair Employment and Housing Act (“FEHA,” Gov. Code, Section 12900 – 12996) and FEHA Regulations (CCR, Section 12005 – 12271). Government Code section 65008 covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.

HCD guidance on Affirmatively Furthering Fair Housing requires an analysis of compliance with existing fair housing laws and regulations. Examples of State fair housing laws include~~The City of Turlock complies with all applicable with State and Federal civil rights and fair housing laws, including but not limited to the following:~~

- **California Fair Employment and Housing Act (FEHA)** (Part 2.8 (commencing with section 12900) of Division 3 of Title 2)
- **California Government Code section 8899.50**, which requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.
- **Government Code section 11135 et seq.**, which requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the State, regardless of one’s membership or perceived membership in a protected class.
- **Density Bonus Law** (Gov. Code, Section 65915.)
- **Housing Accountability Act** (Gov. Code, Section 65589.5.)
- **No-Net-Loss Law** (Gov. Code, Section 65863)
- **Least Cost Zoning Law** (Gov. Code, Section 65913.1)

- Excessive subdivision standards (Gov. Code, Section 65913.2.)
- Limits on growth controls (Gov. Code, Section 65302.8.)
- Housing Element Law (Gov. Code, Section 65583, esp. subds. (c)(5), (c)(10).)

~~The City of Turlock complies with State fair housing laws, including but not limited to California Fair Employment and Housing Act (FEHA); FEHA Regulations; and Government Code sections 65008, 8899.50, and 11135 et seq. Starting in June 2023, the County will act as the administrative jurisdiction for funds that are available to support various services and activities, including housing related activities, that would benefit residents of urbanized areas. As mentioned above, Turlock, as a recipient of CDBG and HOME funds, the City is required to maintain Affirmatively Furthering Fair Housing (AFFH) certification and to demonstrate compliance through its Consolidated Plan and Annual Action Plans, which are submitted to HUD for approval prior to receipt of the CDBG and HOME funds. To the extent that funds are federal or State funds are directed to Turlock in the future, compliance will be demonstrated and maintained through that mechanism. From May 20th to May 24th, 2024, HUD conducted remote monitoring of the City's CDBG-CV program in order to assess the City's performance and compliance with applicable Federal program requirements. HUD's review of the City's program performance resulted in the identification of zero findings and zero concerns, as communicated in the FY2024 Monitoring Report. Additionally, the Federal Fiscal Year 2024 Turlock monitoring review provided an opportunity to address open findings from previous HUD monitoring reviews. The city provided its most recent responses to HUD open findings from prior years. All findings are now closed, and no further response is needed.~~

The City of Turlock complies with State Density Bonus Law (Gov. Code, Section 65915.), the Housing Accountability Act (Gov. Code, Section 65589.5.), and the No-Net-Loss Law (Gov. Code, Section 65863). Section 9-2-103 of the Turlock Zoning Ordinance includes a short summary of the purpose and requirements for affordable housing density bonuses with a cross-reference to the most current State requirements in California Government Code Section 65915. Turlock has not established any additional bonuses or incentives for affordable housing or childcare facilities, nor has the City enacted any local ordinances, such as rent control or rent freezes, inclusionary regulations, or eviction protection ordinances. Turlock has not denied any affordable housing project in its jurisdiction, and through this Housing Element, commits to implementing a plan to ensure adequate sites to accommodate its RHNA obligations during the planning period, and to comply with other legal requirements. In preparing this Housing Element, Turlock has reviewed its Zoning Code to identify regulations that create potential constraints to housing development some of which also interfere with efforts to further fair housing. The Action Plan in Chapter 4 of this Housing Element includes programs intended to reduce constraints to residential development that will also help Turlock further fair housing.

~~The City of Turlock received the Notice of Violation letter from the California Department of Housing and Community Development (HCD), dated June 19, 2025, regarding non-compliance with homelessness provisions and other housing element requirements. The City provided a response on July 2, 2025 clarifying the context for a recent City Council decision regarding support for County PLHA funding of an existing emergency shelter in Downtown Turlock and enumerating various efforts the City is undertaking to address homelessness citywide. The response letter also reiterated the City's commitment to achieving a compliant and certified Housing Element and provided a detailed schedule for achieving that objective.~~

~~The Notice of Violation cited a decision by the Turlock City Council on April 22, 2025 regarding support of an application for Stanislaus County Permanent Local Housing Allocation Program (PLHA) funding by We Care, a non-profit group that operates an emergency shelter for homeless men in Turlock. The Notice of Funding Availability (NOFA) issued by Stanislaus County required a letter of support and certified City Council resolution, which the City was prepared to provide in exchange for a commitment from We Care~~

to help mitigate the health and safety impacts from its shelter operations in the surrounding downtown business area. In February 2025, the City suggested either 10 hours of additional street clean up or opening We Care restrooms during daytime hours after clients had to leave the shelter as potential mitigation. At a City Council meeting on April 8, 2025 when the letter of support and certified resolution were to be considered, the We Care Program Coordinator informed the City Council that she did not have the authority to agree to any mitigation efforts, and accordingly consideration of the item was continued until the next Council meeting to give the Program Coordinator the opportunity to talk with the We Care board. Initially, in advance of the April 22 City Council meeting, the We Care Program Coordinator had indicated that shelter restrooms would be made available during the day; however, 5 minutes prior to the scheduled start of the meeting the We Care Program Coordinator informed the City Manager that the restrooms would not be available during the day. As a result, the City Council declined to provide the letter of support and resolution, as there was no partnership commitment by We Care. Subsequently, on April 25, 2025 the We Care Program Coordinator contacted the City Manager to committing to providing daytime bathrooms and the Mayor and City Clerk put a call for a special meeting on Monday May 5 to reconsider the We Care PLHA funding item; however, a quorum could not be convened. Consequently, the application deadline passed and the PLHA funds reverted to the County. As of November 2025, the County has not issued a new NOFA. Nevertheless, the We Care shelter continues to operate in Downtown Turlock. The facility closed temporarily during the summer as it does annually and reopened again in August 2025. Additionally, the Turlock Gospel Mission homeless shelter, which accepts men, women, and families, has operated continually in Turlock throughout 2025.

Although We Care's County PLHA application was not approved for this recent round of funding, the City of Turlock continues to take actions to prevent homelessness and provide for the needs of people experiencing homelessness in Turlock through various means:

- In October 2024, the City transferred a fourplex to We Care with a forgivable loan covering the acquisition costs. This project has housed 11 low-income tenants and provides We Care with approximately \$4,000 in monthly rental income. Turlock has previously transferred another fourplex and a duplex to We Care with forgivable loans, which not only house low-income households but also provide the organization with monthly rental income that can be used to support We Care's shelter operations.
- Four units, comprising two single-family dwellings and one duplex, are being transferred to the United Samaritans Foundation (USF) with a forgivable loan to cover acquisition costs. These properties have created affordable housing for 14 individuals, helping prevent homelessness. USF will receive an approximate monthly rental amount of \$4,000 from these properties, which can be used to support other programs administered by USF for the special needs population.
- The City of Turlock has three other residential properties in the rehabilitation process. Two of these are proposed for transfer to non-profit agencies through a Request for Proposals (RFP) process, with forgivable loans. This will increase the supply of affordable housing while also providing capacity-building opportunities for non-profits that serve special needs populations.

Last fiscal year, several programs serving the homeless were also supported through the City's Public Services grants utilizing Community Development Block Grant (CDBG) funding, including:

- The United Samaritans Foundation's Emergency Food Box assisted 331 low-to moderate-income individuals and homeless families by providing monthly food support, and its Senior Congregate Lunch Program served 33 elderly residents with nutritious meals and social engagement opportunities.
- We Care's Emergency Shelter provided overnight accommodations to 28 homeless men.

- The Center for Human Services reached two homeless or unsheltered youth with street outreach and case management.
- Healthy Alternatives to Violent Environment (HAVEN) aided 11 domestic violence survivors with housing-related support.
- Project Sentinel provided housing counseling and tenant-landlord dispute resolution services to 13 low-income individuals.

For the 2025-2026 fiscal year, the City of Turlock has allocated CDBG public service grant funding for several community support programs, including:

- The United Samaritans Foundation's Emergency Food Box Program is expected to serve approximately 300 homeless individuals and families.
- The Center for Human Services plans to support 20 homeless and unsheltered youth, ages 13-24, in the Turlock area.
- HAVEN expects to assist 50 individuals with essential housing-related services, focusing on low to moderate-income residents who are victims of domestic violence.
- Project Sentinel estimates it will serve 30 individuals by providing comprehensive counseling, education, information, and referrals related to housing discrimination, tenant-landlord disputes, and home foreclosure.

Additionally, the City of Turlock actively participates in regional initiatives to address homelessness through partnerships with the Stanislaus Community System of Care (CSOC) and the Stanislaus Homeless Alliance (SHA). The City of Turlock Care Team collaborates with the Stanislaus County Care Team to offer resources to individuals experiencing homelessness in our community.

Building on this commitment to preventing homelessness and providing for the needs of people experiencing homelessness in Turlock, the City is working to complete the statutorily required analysis related to special needs populations and incorporate programs to address identified needs, including for people experiencing homelessness, into the Housing Element as needed to substantially comply with State Housing Element Law.

On September 5, 2025, a Turlock property owner informed the City that he has filed a housing discrimination complaint against the City with the Civil Rights Department. While the City has had no communications from the Civil Rights Department or any other agency regarding this complaint, the property owner informed City staff that a representative would be contacting him on December 16, 2025 to conduct a telephone intake interview. The property owner's complaint stems from City enforcement actions regarding a large shade structure erected in the backyard of 1842 Moonbeam Way without a building permit and within the setbacks. Based on complaints from neighbors, the City informed the property owner of 1842 Moonbeam Way of code violations and outlined three options available to bring the structure into compliance. City staff has met with the property owner on multiple occasions to outline the options available to him, but the property owner has not elected to pursue any of the remedies available to him. The code enforcement actions taken by the City in relation to this matter do not relate to nor have they prevented the permitting or construction of any housing units.

The City is not aware of any other findings, lawsuits, consent decrees, judgments, and any other legal matters regarding fair housing. The City provided a response to HCD on July 2, 2025, outlining a strategy to bring its Housing Element into compliance with State law. The City of Turlock recognizes the importance of having a compliant and certified Housing Element and is actively revising its Housing Element to address comments identified by HCD.

LENDING PRACTICES

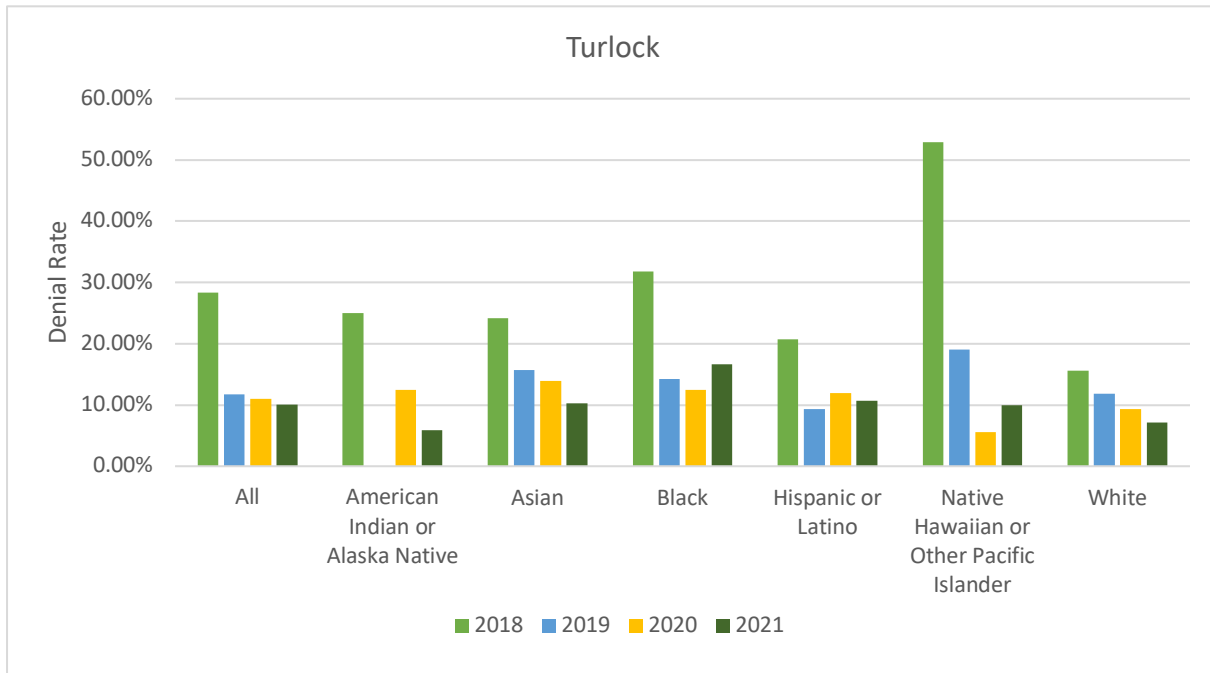
Discrimination in lending practices can be a major contributor to fair housing issues in a community because it limits the ability of individuals to live in a location of their choosing. The Home Mortgage Disclosure Act (HMDA) requires financial institutions, including banks, savings associations, credit unions, and other lenders, to annually disclose mortgage data to the public. HMDA financial data by itself is insufficient to conclusively identify instances of discrimination in lending but analysis of HMDA data is useful for exploring discrepancies in lending outcomes and identifying areas of concern.

Based on 2018 HMDA data, the 2020-2025 Regional AI for Stanislaus Urban County and the Cities of Turlock and Modesto found that out of 16,00 loans originated in Stanislaus County, 2,327 loans (14.5 percent) originated in Turlock. In 2018, Turlock experienced the highest approval rate in Stanislaus County at 59.5 percent which is higher than the national approval rate of 53.4 percent. Countywide in 2018, White applicants were approved for loans at a rate of 63.8 percent, compared with Hispanic applicants at a rate of 59.7 percent, Black applicants at a rate of 57.1 percent, and Asian applicants at a rate of 55.4 percent. In Turlock in 2018, White applicants were approved for loans at a rate of 65.5 percent, Asian applicants at a rate of 59.5 percent, Hispanic applicants at a rate of 58.7 percent, and Black applicants at a rate of 55.0 percent. Compared to the County, White and Asian applicants were approved at a higher rate in Turlock, while Black and Hispanic applicants were approved at a lower rate. The data does not indicate the grounds for the denial, and it cannot be proven on the basis of this data that the denials were not justified on the basis of standard financial criteria; however, the trend suggests both a potential for bias within the financial system and a need for financial literacy training among non-Whites to help those groups better understand how to improve their credit scores.

Charts D-1 and D-2 provide an overview of lending patterns in Turlock when compared to the county and over time. Chart D-1 confirms the findings of the 2020-2025 AI showing that potentially discriminatory lending patterns have continued at the county level up until the year 2021. Turlock has similarly seen uneven lending patterns, and as of 2021 (the most recent year that data is available) Black applicants had the highest loan denial rates, followed by Hispanic or Latino applicants. Further, since 2018, White applicants in Turlock have consistently experienced lower than average loan denial rates. The wider variation in loan denial rates for American Indian or Alaska Native and Native Hawaiian or Other Pacific Islander applicants is due to the low number of applicants during the period who identified as such. Chart D-3 and Chart D-4 show that in 2021, the City had higher loan approval rates for both home improvement and home purchase loans than the Stanislaus County.

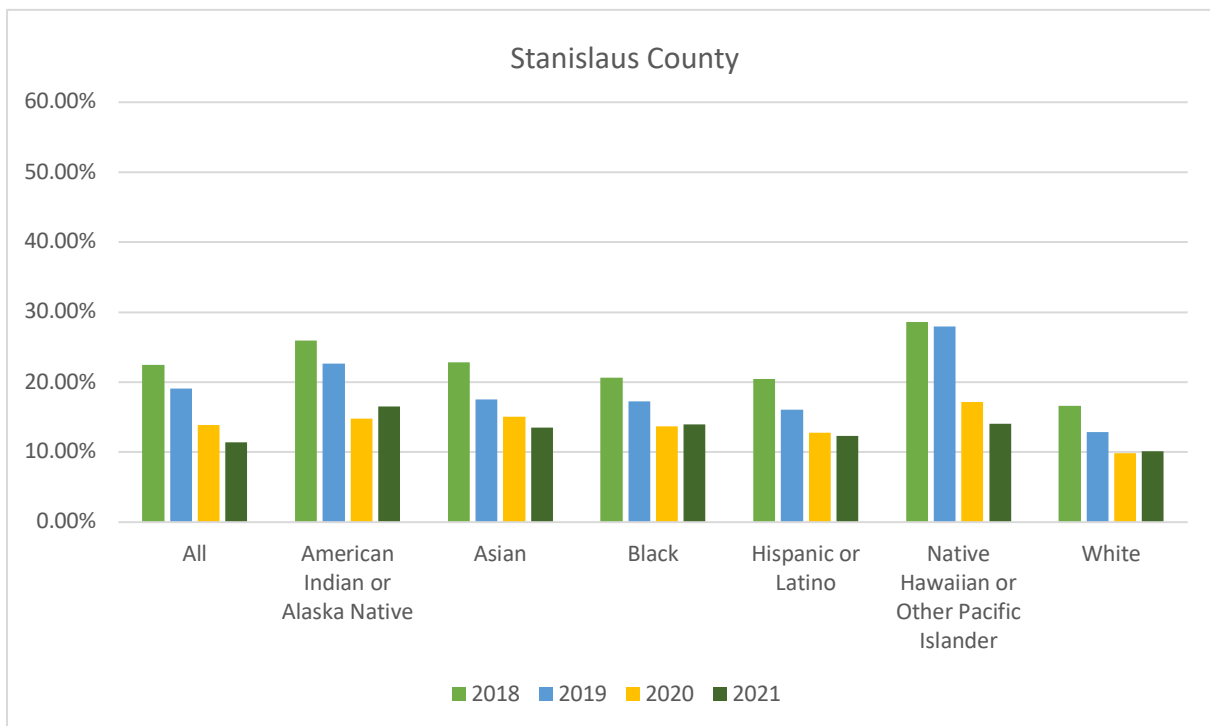
Based on the identified disparities of lending patterns for residents of color and a history of discriminatory lending practices, the 2020-2025 AI recommended further fair lending investigations/testing into the disparities identified through the HMDA data analysis. More generally, it recommended that jurisdictions like Turlock may prefer lending institutions with a Community Reinvestment Act (CRA) rating of “Outstanding” and may exclude those with a rating of “Needs to Improve” or “Substantial Noncompliance” according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). The AI also recommended Turlock and other jurisdictions to strengthen partnerships with lenders to discuss lenders’ community reinvestment goals, including home mortgages, home improvement loans, and community development investments to be made in low- and moderate-income neighborhoods in the Stanislaus Urban County and in the City of Turlock.

Chart D-1: HMDA Loan Denial Rates by Race/Ethnicity, Turlock



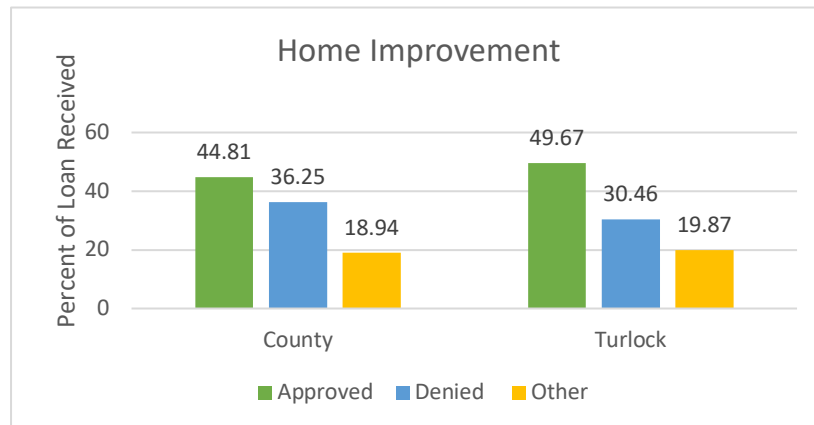
Source: Home Mortgage Disclosure Act Data, 2018-2021

Chart D-2: HMDA Loan Denial Rates by Race/Ethnicity, Stanislaus County

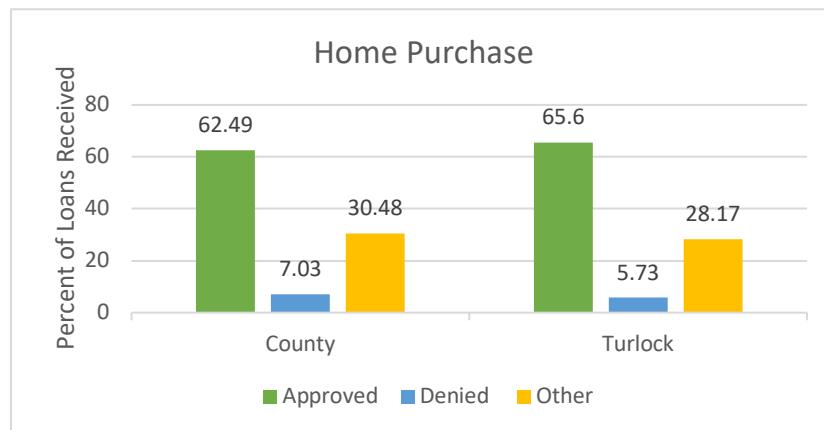


Source: Home Mortgage Disclosure Act Data, 2018-2021

Chart D-3: HMDA Home Improvement Loan Applications, 2021



Source: Home Mortgage Disclosure Act Data, 2021



Source: Home Mortgage Disclosure Act Data, 2021

BROKERAGE SERVICES

Real estate brokers or salespersons whose business is in Turlock may belong to one of several associations but most likely the Central Valley Association of Realtors (CVAR). Like all associations, CVAR has a Multiple Listing Service (MLS)—Paragon MLS—and is part of the NORCAL MLS Alliance, an MLS data integration project across the seven leading MLSs in Northern California. CCAR is bound by the Code of Ethics and Standards of Practice of the National Association of Realtors (NAR), which explicitly states in Article 10 that members shall not discriminate against any person based on race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. In addition to adopting the ethics standards set by the NAR, the state branch promotes its own diversity and inclusion programs, such as the Latino Initiative Voices in Action program, which provide educational materials for members on homeownership opportunities and fraud prevention.

PROPERTY MANAGEMENT

Project Sentinel identified the largest rental companies in Stanislaus County as Liberty Property Management, Cornerstone Property Management, Matel Realtors, Marshall Perty, GreenGate Property Management, and Stanislaus Property Management. Half of these companies belong to California

Apartment Association (CAA), the country's largest trade association for rental property owners and managers. However, there are a substantial number of owners who rent out units without going through a property management company, generally referred to as "mom and pop" landlords, or small, independent landlords. CAA reports that the majority of these small, independent landlords are not CAA members due to the time and cost to join, even though the actual benefits of joining may outweigh the costs when they run into issues. CAA also finds that most landlords who call the helpline are these small, independent owners. CAA encourages them to attend training and to utilize services as members.

CAA supports the spirit and intent of all local, State, and Federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. When signing up to become a member of the California Apartment Association, new members agree to abide by the following provisions of their Code of Ethics and Code of Equal Housing Opportunity. The Code of Equal Housing Opportunity reads as follows:

- We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;
- We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;
- We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and
- We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.

CAA provides members with tenant screening services, application forms, and other types of landlord tenant forms, which if used by CAA members provide legal procedures for processing rental applications and resolving tenant issues. Further, should landlords stay within these guidelines, they will likely avoid committing housing violations. CAA offers a landlord helpline where landlords can call and speak to an attorney about their responsibilities. Lastly, all members receive a fair housing flyer to post on-site at their properties which states that it is illegal to discriminate based on the protected classes. When CAA receives complaints about potential fair housing violations, the association provides tenants with information on their rights and then refers them to the California Department of Fair Employment and Housing to file a claim. The Executive Director of CAA's Central Valley branch stated that her experience has been that most tenant complaints are about non-CAA members. The director said that these non-CAA members are independent landlords with little training and are unaware of the laws. For this reason, CAA makes additional efforts to reach these smaller operations throughout outreach events and the landlord helpline. Considering there is a large proportion of property owners who are not CAA members, Turlock and other Stanislaus County jurisdictions that contract with Project Sentinel can collaborate on outreach, education, and training to small, independent landlords about fair housing topics and regulations. Respondents to a Housing Element survey conducted by Stanislaus County identified landlord-tenant counseling and education/information on tenant rights as the two services needed most in their communities.⁷

Although recent declines in the population of Turlock and other Stanislaus County communities may relieve the shortage of affordable housing in the short-term, Stanislaus County and its communities are

⁷ Stanislaus County Draft 2023-2031 Housing Element, 2023. Available: <https://www.stancounty.com/planning/pl/pdf/draft-2023-2031-housing-element.pdf>

projected to grow over the next 40 years, which means that the shortage of affordable housing can be expected to continue. Landlords have little incentive to rent units to applicants with vouchers, disabilities, households with children, or other protected groups when they can find tenants able to afford to market rents. Programs that prioritize housing development for persons with disabilities, families with children, and those most at risk of homelessness, may be particularly effective.

D.2 Segregation and Integration

Patterns of segregation within a community can be a result of public or private actions, whether intentional or unintentional, that affect where different racial and ethnic groups and individuals in other protected classes live. Racial and ethnic characteristics are probably the most common and well-known basis for housing discrimination, but segregation may also be based on disability, familial status, and the level and source of household income. This section explores patterns and trends of segregation based on race and ethnicity, disability, familial status, and income level in the City of Turlock and the surrounding region. These groups are not mutually exclusive, and there may be considerable overlap across each protected class. Historically throughout the U.S., including in California and Stanislaus County, restrictive and exclusionary zoning practices have contributed to racial and economic segregation.

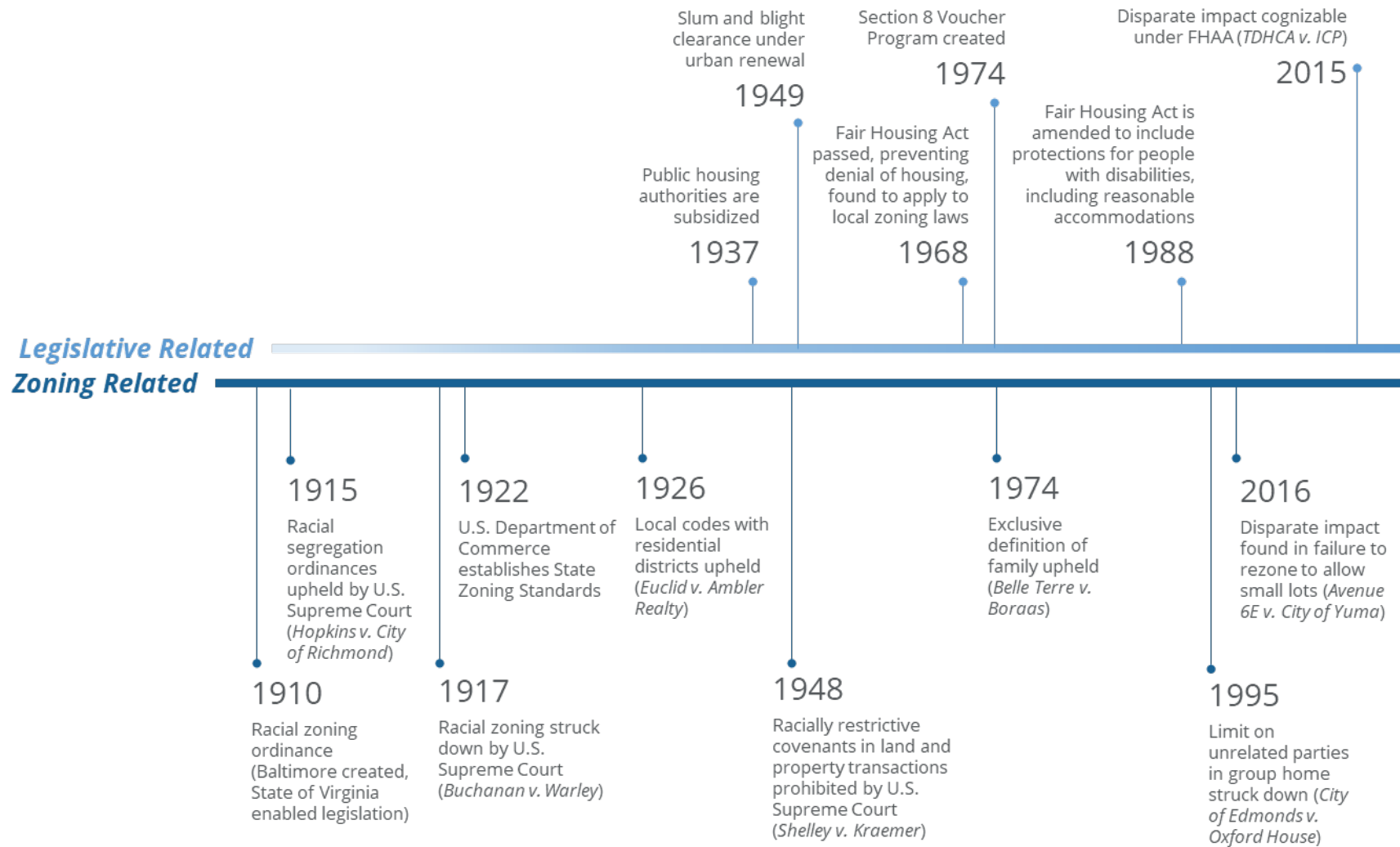
After the Civil War, John W. Mitchell, a wealthy land speculator, bought 100,000 acres where Turlock is now located, that were used for large herds of cattle and sheep as well as growing wheat. By the early part of the 20th century, Turlock had become the heart of a major agricultural area, which stands true today. Japanese immigrants from rural farming and fishing areas arrived in California to fill a labor shortage created by the 1882 Chinese Exclusion Act, which prohibited Chinese immigration to the U.S. California lawmakers soon passed racist ordinances targeting *issei* (first-generation) farmers: the California Alien Land Law of 1913 barred Asian immigrants from owning agricultural land or signing leases longer than three years. Newly arrived Japanese had few employment opportunities, but they were able to find jobs as agricultural workers. See [Chart D-5](#) for a more detailed timeline of segregation’s history in relation to fair housing practices.

Due to resentment toward Chinese and Japanese immigrants, especially from jobless White residents, many of whom had moved to California from the Dust Bowl, a series of severe dust storms swept across the mid-west states of Oklahoma, Arkansas, Kansas, and Texas during the 1930s, growers began recruiting Blacks from the south. Blacks continued to move to the area after Japanese residents were moved into internment camps. Turlock was the site of one of several temporary detention camps established during the first phase of the mass incarceration of 97,785 Californians of Japanese ancestry during World War II. The so-called Turlock Assembly Center was located at the Stanislaus County Fairgrounds from April 30 to Aug. 12, 1942.⁸ At the height of its population, 3,692 people lived in barracks constructed on the fairgrounds.⁹ The Stanislaus County Fairgrounds is now located in central Turlock, in Tract 38.04 where it and surrounding tracts are deemed racially integrated, as shown on Map D-1. Due to a boom in population attributed to the expansion of State Route 99 in the 1970s, Turlock grew west to meet the freeway’s north-south path. This area is also where most of the city’s low-medium segregation tracts are located, as well as the City’s only High Segregation and Poverty tract (see discussion in Section D.3 and Map [D-18](#) below).

⁸ California Historical Landmarks in Stanislaus County, Temporary Detention Camps for Japanese Americans – Turlock Assembly Center. Available: <https://noehill.com/stanislaus/cal0934.asp>

⁹ Turlock Journal, 2009. [Turlock Japanese American assembly center to be memorialized. Available: https://www.turlockjournal.com/news/local/turlock-japanese-american-assembly-center-to-be-memorialized/](https://www.turlockjournal.com/news/local/turlock-japanese-american-assembly-center-to-be-memorialized/)

Chart D-5: Timeline of Segregation Policies in the United States



During World War II, many Black and White agricultural workers moved to California's urban areas to fill jobs in the defense industry and other employment sectors. Additionally in this same timeframe the federal government initiated the Bracero program to attract workers from Mexico to help address a shortage of farmworkers. After the program ended in 1964, Mexican farmworkers continued to come to the Central Valley for agricultural work. Non-Hispanic Whites remain the largest racial group in Turlock and Stanislaus County, but Hispanics are now the second largest ethnic group comprising about 48 percent of the countywide population.

In addition to these ethnic groups, the southern part of Turlock has been known historically as "Little Urmia" because of the immigration of Assyrians in the early 20th century. Early Assyrian settlers began to arrive in the United States during the last part of the 19th century and came mainly from northwestern Iran (Urmia region) as early as 1910 but the migration increased due to the genocide committed against them before, during and after World War I by the Turks, Kurds, and Moslem Persians. By 1915, when the total population of Turlock was about 1,500, there were ten Assyrian families living in Turlock. By 1921, the Assyrian community had grown to become known as "little Urmia." According to the 2020 US Census, 5.8 percent of Turlock residents reported that they had Assyrian ancestry, most located in southern Turlock in racially integrated Tract 37.

Historic segregation patterns in Turlock may be a factor that continues to affect the disparate characteristics of neighborhoods. Map D-1 shows neighborhood segregation in Turlock. The most racially integrated areas of Turlock today include Tract 38.04, where former internment camps were located, and Tract 37, where Assyrian settlers immigrated and settled. By contrast, Tract 39.05 in Turlock is classified as high White segregation, which can be traced back to the early immigration of White residents in central, east Turlock.

Turlock has one census tract that meets the criteria for designation as High Segregation and Poverty tract, Tract 38.02. As discussed in Section D.3 Racially/Ethnically Concentrated Areas of Poverty and Affluence, the population of this tract is predominantly Hispanic and has seen a decrease in non-Hispanic White residents that reflects Turlock's overall demographic changes.

Additionally, the most racially integrated areas of Turlock today are Census tracts designated by the State as Disadvantaged Communities (DACs), or low-income areas disproportionately affected by environmental pollution and other hazards that can lead to negative health effects. According to City Housing Division staff, these areas are more integrated compared to other areas in Turlock due to the affordability, age of housing units, and mix of uses. As buildings age and initial construction costs are paid off, they may become less desirable due to wear and tear, which can contribute to lower prices, allowing all races opportunity to access housing. Additionally, City staff noted homeowners in these integrated areas may rent out their housing units or rooms at a lower price than market-rate, thus making housing more affordable in these areas compared to others. Lastly, integrated areas in Turlock are composed of a mix of residential, industrial, and commercial uses, making these areas less desirable than single-family neighborhood, thus allowing them to be more affordable for all races.

Racially/Ethnically Concentrated Areas of Affluence (RCAAs) census tracts are located along the very eastern edge of the city (Tract 39.05), while one RCAA is located outside the city to the east (Tract 36.08). The RCAA tract in Turlock is 71.6 percent White (Hispanic or Latino) and has 79.6 percent of units occupied by owners, and 98.2 percent of homes are single family dwellings (the highest percent in all Turlock tracts). Further detail about these RCAA is included in Section D.3 Racially/Ethnically Concentrated Areas of Poverty and Affluence.

RACIAL AND ETHNIC SEGREGATION CHANGE IN PATTERNS OVER TIME

Turlock's racial and ethnic patterns of segregation need to be understood in the context of changing regional and local demographics. As shown in Table D-1, the population of Stanislaus County Turlock increased by 27.87 percent between 2010 and 2020, with a projected increase of about 15.3 percent between 2020 and 2040. Non-Hispanic White residents are still the largest population but have decreased by 12.8 percent and is only slightly larger than the Hispanic or Latino residents of any race, which grew by 15.4 percent between 2010 and 2020. The City's Hispanic or Latino residents of any race are now the largest non-Hispanic or Latino Asian and non-Hispanic or Latino Black populations each increased by around a third. The non-Hispanic or Latino Other Race or Multiple Races population had the largest increase, increasing by two-thirds. The non-Hispanic or Latino American Indian/Alaska Native and non-Hispanic or Latino Native Hawaiian/Pacific Islander populations changed marginally, increasing by 0.25 percent and decreasing by 2.1 percent, respectively. These patterns directionally resemble the County's diversity, which saw increases in non-Hispanic or Latino Black, non-Hispanic or Latino Asian, and non-Hispanic or Latino Other Race or Multiple Races populations and Hispanic or Latino populations; a decrease in non-Hispanic or Latino White population; and marginal changes in non-Hispanic or Latino American Indian/Alaska Native and non-Hispanic or Latino Native Hawaiian/Pacific Islander populations.¹⁰ However, the City saw greater change in magnitude among each racial and ethnic group, followed by non-Hispanic White residents. The White population is expected to grow by 5.25 percent by 2040 compared with the Hispanic of any race population, which is projected to grow by 24.46 percent. Significant growth in the multiracial population is also expected (31.31 percent) followed by the Black population, which is expected to increase by 28.37 percent. This growth in the Hispanic, non-Hispanic or Latino Black, and non-Hispanic or Latino Other Race or Multiple Races population is probably could be reflecting the trend in the due to the movement of Black and Latino households from the Bay area Area to San Joaquin and Stanislaus Counties in search of more affordable housing.¹¹

Despite the diversity of the County, the population is unevenly distributed geographically by race/ethnicity. In Turlock, Salida, and Modesto, between 36 to 49 percent of the population is non-Hispanic White. The three CCDs with the highest concentrations of non-Hispanic White people are Hughson, Oakdale, and Waterford, which are adjacent to each other in the eastern end of the county. Westport, Newman, and Patterson, adjacent to one another in the western part of the county, have the lowest non-Hispanic White population percentages, and are adjacent to each other on the western side of the county.

In the Turlock (including Ceres), Salida, and Modesto CCDs, in the center of the county, the White population ranges from 36.60 percent to 48.90 in the Turlock subdivision. In 2020, Stanislaus County had the highest percent of non-Hispanic White residents among the eight counties in the greater San Joaquin Valley region and Merced County, just south of Stanislaus County, had the lowest percent among the eight counties in the greater San Joaquin Valley region.

Source: California Department of Finance, Table P-2D, County Population by Total Hispanic and Non-Hispanic Race (2010–2060)

¹⁰ California Department of Finance, Table P-2D, County Population by Total Hispanic and Non-Hispanic Race (2010–2060). <https://dof.ca.gov/forecasting/demographics/projections/>

¹¹ Turner Center for Housing Innovation. 2018. "Disparity in Departure: Who Leaves the Bay Area and Where Do They Go?" https://turnercenter.berkeley.edu/wp-content/uploads/pdfs/Disparity_in_Departure.pdf

The State approved legislation in 2021 that requires counties to establish a program to redact racial covenants that barred Black, Chinese, Japanese and other racial or ethnic groups from owning or occupying homes in certain areas of the county. Although such restrictions have been illegal and unenforceable for more than half a century, they remain in many property documents as a review of covenants in Modesto showed. Government Code Section 12956.2 requires counties to identify and redact such covenants that remain in records. Stanislaus County is hiring a vendor to meet this requirement, but ~~in the meantime~~, has published a form that allows property owners and other parties to undertake the process for individual properties in the meantime.^{12, 13}

Table D-1 displays the population dynamics within census tracts by race and ethnicity between 2010 and 2020. Change in non-Hispanic or Latino American Indian/Alaska Native populations and non-Hispanic or Latino Native Hawaiian/Pacific Islander populations within census tracts did not have a predominant trend and are quite mixed. Non-Hispanic or Latino Asian populations increased within all but two tracts, with the highest increase (252.6 percent) in Tract 39.08, a Low Resource area by California Tax Credit Allocation Committee (TCAC) measures. Non-Hispanic or Latino Black populations increased within all but two tracts, with a larger decline in Tract 39.05, a tract considered to be High Resource and a Racially Concentrated Area of Affluence. The largest increase of Non-Hispanic or Latino Black residents within tracts were Tracts 36.03 and 38.03, both Moderate Resource areas designated as Disadvantaged Communities. Non-Hispanic or Latino Other Race or Multiple Races increased within every tract. The largest increases (between 134.4 and 137.2 percent) were in Tracts 39.04 and 39.05, both of which are High Resource. By contrast, Non-Hispanic or Latino White populations consistently decreased within each tract between 6.3 and 19.4 percent, with the exception of Tract 38.05, which saw no change. The Hispanic or Latino population of any race increased within all tracts between 2010 and 2020, except for Tract 36.08 and a small decrease in Tract 38.02. All tracts in Turlock saw population increases except for Tract 36.08 at a 19.3 percent decrease and Tract 38.02's small decrease of 2.3 percent. Information on TCAC resource areas is explained further in Section D.4 Disparities in Access to Opportunity.

¹² The Modesto Bee, 2023. "Stanislaus County to search for records revealing white-only neighborhoods and racism." Available: <https://www.modbee.com/news/local/article273097685.html> The Modesto Bee, 2023. Available: <https://www.modbee.com/news/local/article273097685.html>

¹³ Stanislaus County, 2022. "Stanislaus County Clerk-Recorder's Office Restrictive Covenant Modification Program Implementation Plan". Available: <https://www.stancounty.com/clerkrecorder/pdf/restrictive-modification-program.pdf> Stanislaus County Clerk-Recorder's Office Restrictive Covenant Modification Program Implementation Plan. Available: <https://www.stancounty.com/clerkrecorder/pdf/restrictive-modification-program.pdf>

	American Indian/Alaska Native (NH)			Asian (NH)			Black (NH)			Native Hawaiian/Pacific Islander (NH)			Other Race, Multiple Races (NH)			White (NH)			Hispanic or Latino (any race)			Total		
Tract	2010	2020	Percent change	2010	2020	Percent change	2010	2020	Percent change	2010	2020	Percent change	2010	2020	Percent change	2010	2020	Percent change	2010	2020	Percent change	2010	2020	Percent change
36.03	13	13	0.0%	30	21	-30.0%	4	9	125.0%	1	3	200.0%	70	135	92.9%	2,188	2,050	-6.3%	1,646	1,781	8.2%	3,952	4,012	1.5%
36.04 in 2010, 36.08 in 2020	48	27	-43.8%	234	328	40.2%	31	34	9.7%	6	7	16.7%	181	353	95.0%	5,274	3,883	-26.4%	2,318	1,898	-18.1%	8,092	6,530	-19.3%
36.09 (Part of 2010 Tract 36.05)	34	13		647	372		158	50		46	15		327	199		4,744	2,026		2,051	1,018		8,007	3,693	
36.10 (Part of 2010 Tract 36.05. See 36.09 for 2010 data)	1	29	23.5%	1	442	25.8%	1	106	-1.3%	1	21	-21.7%	1	206	23.9%	1	2,219	-10.5%	1	1,803	37.5%	1	4,826	6.4%
36.11 (Part of 2010 Tract 36.06)	41	16		1,262	636		183	76		41	11		376	193		6,019	2,140		2,916	1,100		10,838	4,172	
36.12 (Part of 2010 Tract 36.06. See 36.11 for 2010 data)	1	20	-12.2%	1	1,131	40.0%	1	171	35.0%	1	27	-7.3%	1	419	62.8%	1	3,347	-8.8%	1	2,188	12.8%	1	7,303	5.9%
37	33	35	6.1%	242	253	4.5%	37	64	73.0%	24	39	62.5%	119	138	16.0%	1,862	1,664	-10.6%	2,476	2,803	13.2%	4,796	4,996	4.2%
38.02	30	33	10.0%	96	158	64.6%	66	97	47.0%	8	6	-25.0%	79	127	60.8%	1,223	1,069	-12.6%	4,358	4,234	-2.8%	5,860	5,724	-2.3%
38.03	7	6	-14.3%	243	197	-18.9%	22	50	127.3%	21	10	-52.4%	58	69	19.0%	723	630	-12.9%	1,930	2,083	7.9%	3,004	3,045	1.4%
38.04	50	54	8.0%	215	210	-0.02%	85	114	34.1%	27	22	-18.5%	147	205	39.5%	2,577	2,076	-19.4%	3,349	4,145	23.8%	6,450	6,826	5.8%
38.05	14	10	-28.6%	218	441	102.3%	31	51	64.5%	19	20	5.3%	85	164	92.9%	1,194	1,194	0.0%	1,106	1,207	9.1%	2,667	3,087	15.7%
39.04	19	13	-31.6%	55	124	125.4%	44	61	38.6%	20	22	10.0%	94	223	137.2%	2,384	2,099	-12.0%	1,758	2,190	24.6%	4,374	4,732	8.2%
39.05	18	22	22.2%	53	60	13.2%	24	13	-45.8%	4	6	50.0%	93	218	134.4%	3,065	2,688	-12.3%	614	933	52.0%	3,871	3,940	17.8%
39.06	28	34	21.4%	124	251	102.4%	162	197	17.8%	28	15	-46.4%	151	249	64.9%	2,339	1,895	-19.0%	2,048	2,488	21.5%	4,880	5,129	5.1%
39.07	21	34	61.9%	251	307	22.3%	91	122	34.1%	15	7	-53.3%	224	362	61.6%	5,658	4,999	-11.6%	1,200	1,735	44.6%	7,460	7,566	1.4%
39.08	7	10	42.9%	57	201	252.6%	39	80	105.1%	3	14	366.7%	95	145	52.6%	1,133	955	-15.7%	892	1,044	17.0%	2,226	2,449	10.0%
39.09	34	29	-14.7%	164	269	64.0%	88	125	42.0%	27	39	44.4%	223	370	65.9%	3,573	3,414	-9.0%	1,691	2,379	40.7%	5,980	6,625	10.8%
Total	397	398	0.25%	3,891	5,401	38.8%	1,065	1,420	33.3%	290	284	-2.1%	2,322	3,775	62.6%	43,956	38,348	-12.8%	30,353	35,029	15.4%	82,457	84,655	2.7%

I. NH refers to non-Hispanic or Latino.

II. Percent change for tracts with boundary changes was calculated by combining the 2020 values of the singular 2010 tract, subtracting the combined values from the 2010 value, and dividing by the 2010 value.

Source: U.S. Census Bureau Decennial Census, Table P-9 Hispanic or Latino, and not Hispanic or Latino by Race (2010-2020)

PERSONS WITH DISABILITIES

Persons with disabilities may face discriminatory housing practices based on their disability, including the lack of accessible dwellings and refusal by housing providers to offer reasonable accommodations. Data shows that from a housing perspective, there are several different housing needs of disabled persons. For those disabled with a developmental or mental disability, one of the most significant problems is securing affordable housing that meets their specialized needs. Housing needs can range from institutional care facilities to facilities that support partial or full independence (such as group care homes). Supportive services such as daily living skills and employment assistance need to be integrated into the housing situation also. A disabled person with a mobility limitation requires housing that is physically accessible.

During the last planning period, the City of Turlock approved two requests for deviations from development standards for reasonable accommodations through building permits when the improvements require a building permit. Exceeding the allowable hardscaped area of a front yard is one example of a development standard that was allowed to be deviated from to accommodate an accessible ramp in the front yard of a home. No requests for reasonable accommodation have been denied in Turlock during the last planning period.

Housing staff at the City details Turlock city staff provides resources such as brochures and web materials to those in need. City staff also makes an effort to go to older adults and people with disabilities who cannot come to City Hall for information. City staff also mentioned Legacy Health Endowment, a nonprofit foundation serving in Stanislaus and Merced Counties, that is dedicated to improving residents' health by funding and supporting healthcare services and wellness education.¹⁴ It makes its resources directly available to the community through patient-centered programs, such as affordable generic medicine via its \$2 Medication Program, nursing scholarships, mental health initiatives, and online grant applications and resources. Staff noted that Legacy Health Endowment are actively involved within the Turlock community and have found older adults and people with disabilities greatly benefit from their services.

According to 2021 ACS five-year estimates, 7,576 persons (10.5 percent of the non-institutionalized population) in Turlock had a disability. This proportion is slightly lower than Stanislaus County (12.2 percent) and Modesto (13.7 percent). The most common disabilities in the city are ambulatory (28.0 percent of people with disabilities), independent living difficulty (21.6 percent) and hearing difficulty (12.4 percent). As shown in Map D-2, the northern and eastern portions of the city fewer than ten percent of the population has disabilities while in the rest of Turlock, at least 10 to 20 percent of residents are disabled. There is one Turlock census tract, Tract 39.08 in the center of Turlock, in which persons with disabilities exceed 20 percent of the total tract's population, which is the threshold HCD typically uses as an indicator of overconcentration. Further, group homes and licensed adult residential care facilities are located throughout the city, with concentrations in the northern and southern portions of Turlock as shown in Map D-3. There are 17 licensed residential care facilities within Turlock: two adult day programs and 15 adult residential facilities. There is a cluster of facilities in southern Turlock comprised of four separate structures operating as the Paulson Community for developmentally disabled ambulatory adults, intentionally designed to create a welcoming, neighborhood-like atmosphere. Other residential care facilities are found in central Turlock near the Emanuel Medical Center.

People with disabilities have many different housing needs, depending on their age, level of income, current tenure status, cultural background, and health status. People with disabilities may need assistance with personal and financial affairs, networks of care to provide services and daily assistance, and, possibly, architectural services to design features to allow those with disabilities to live independently. During the

¹⁴ Legacy Health Endowment, 2025. About LHE. Available: <https://legacyhealthendowment.org/about-lhe/>

consultation process conducted as part of the HOME-ARP Allocation Plan, the Turlock/Stanslaus HOME Consortium in 2022, service providers reported that individual with disabilities may find affordable housing in smaller cities or rural areas, but these areas are frequently not accessible for a person’s disability (e.g., wheelchair inaccessible) or are far from needed medical care, healthy food, or transportation.¹⁵

FAMILIAL STATUS

Familial status, and particularly discrimination against families with children, may be another basis for discriminatory housing practices. Such discrimination can limit the choices of where families can live and lead to geographic concentrations within a community. Statistically, female-headed households with children are more likely to be targets of discrimination than other families with households because of their lower income or source of income. Within Turlock, as indicated in Table D-2, most children under 18 years live in married-couple households. About 23 percent of children live in female-headed households with no spouse present compared with 10 percent of children live in male householder, no spouse present households. Female-headed households represented about 10.3 percent of owner-occupied households and 19.3 percent of renter-occupied households. Female-headed households are as common in Turlock as they are in Stanislaus County, as the County has 22 percent female-headed households and 68 percent married-couple households. For female-headed households in Turlock, City staff shared they typically have two to three children and are a predominant group seeking housing assistance, though specific age demographics weren't collected. In Modesto, the other urban center in the County, households with children under 18 are 24.9 percent female-headed households and 65.4 percent married-couple households.

Housing Division staff directs female-headed households to resources from a couple of local organizations such as Healthy Alternatives to Violent Environments (HAVEN), United Samaritans, local churches, and school districts. HAVEN has a collaborative relationship with the City of Turlock to secure office space to bring services closer to home for residents living in the southern portion of Stanislaus County.¹⁶ HAVEN offers supportive services for survivors of domestic violence, sexual assault, and human trafficking. HAVEN provides an emergency shelter for survivors and children, with food, clothing, and a place to sleep, as well as case management/crisis intervention services, and support groups. United Samaritans Foundation offers emergency food boxes and mobile lunch programs for those in need. Turlock Gospel Mission Day Center offers clothing and hygiene supplies, while the Turlock Unified School District operates a Family Resource Center (FRC) where families can receive resources, programs, and services based on the needs and interests of our diverse families. Support at the FRC is specialized to support foster youth, students experiencing homelessness, and refugees/newcomers. City staff is versed in resources available in Turlock and can point special needs groups to a direction that suits their needs.

Table D-2: Children Under 18 Years in Turlock Households, 2022

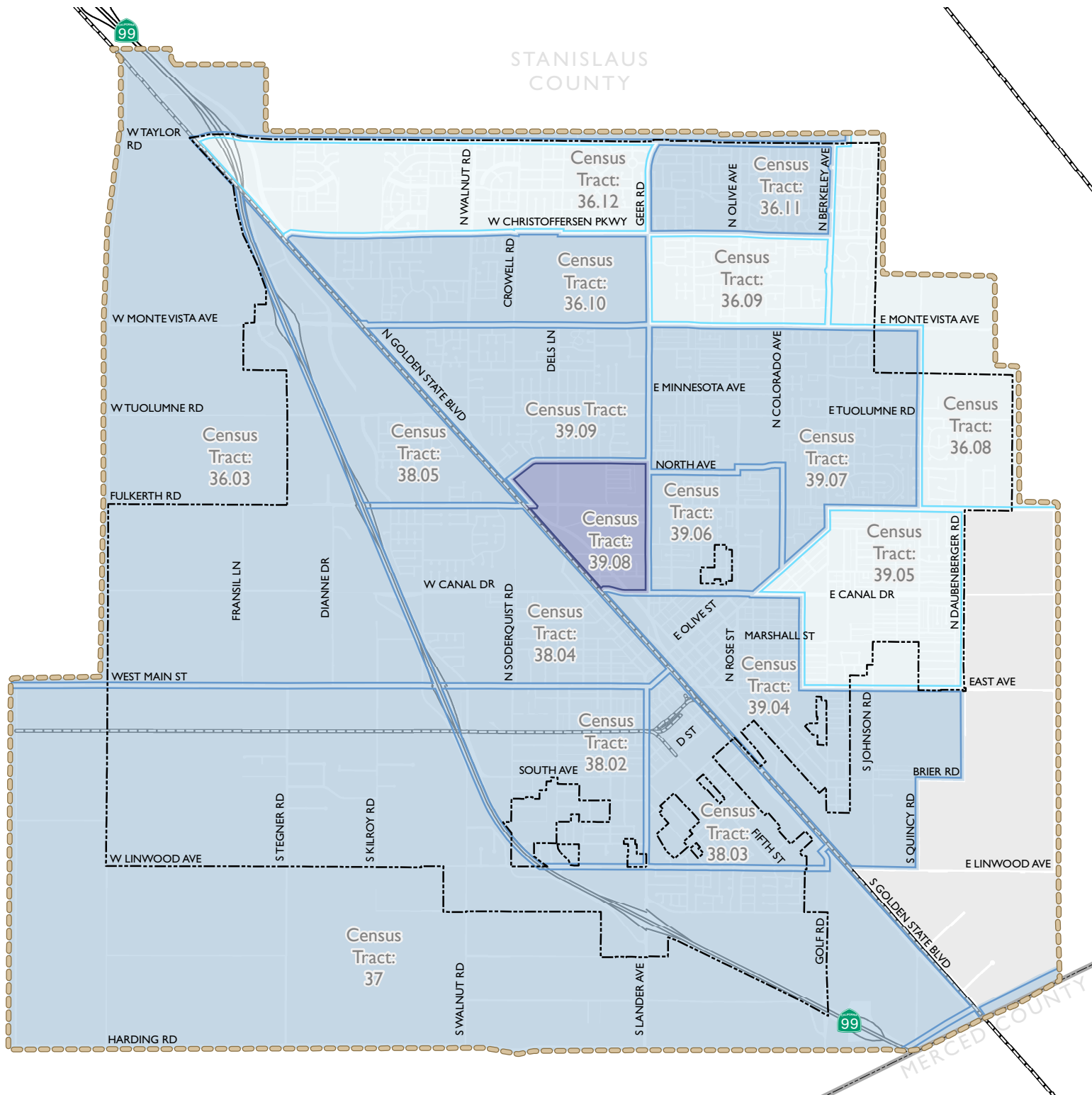
Household type	Number	Percent
Married couple	12,588	66%
Male Householder, No Spouse Present	1,920	10%
Female Householder, No Spouse Present	4,353	23%
Total	18,978	100.0%

Source: U.S. Census Bureau, 2022 ACS Five-Year Estimates (Table S0901)

¹⁵ Turlock/Stanslaus County HOME Consortium, pp. 9-10.

¹⁶ HAVEN, 2025. Turlock Office. Available: <https://www.havenstan.org/turlock-office>

Persons with Disabilities



Map D-3
**Residential Care Facilities
 in Turlock**

- Adult Day Program
- Adult Residential

□ Census Tracts

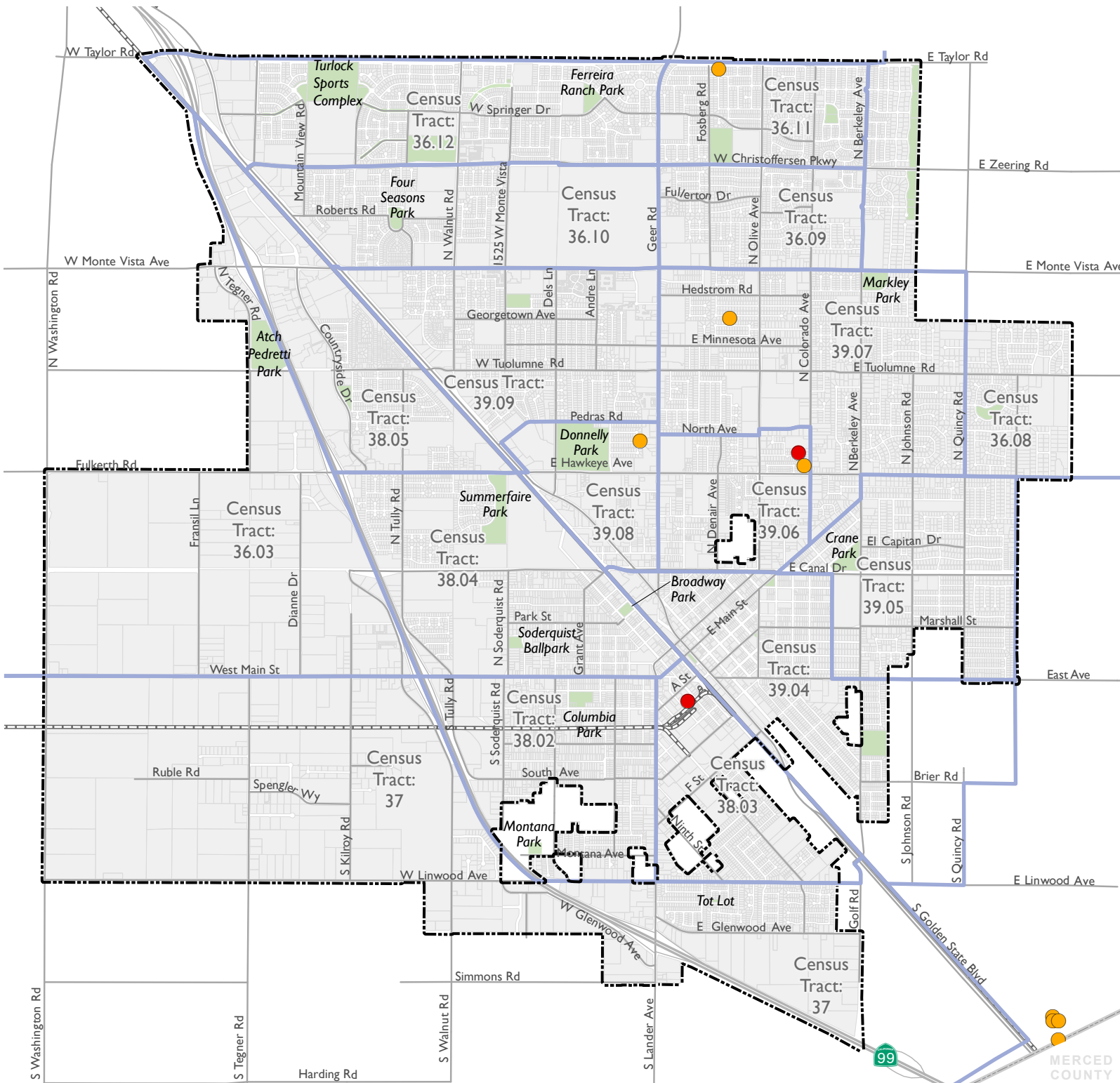
--- City Limit

--- County

— Freeway

— Major Road

— Railroad



Source: California Department of Social Services, 2025; City of Turlock, 2024; Dyett & Bhatia, 2024

Map D-43 and Map D-54 show the percentage of children in each census tract that live in different types of family households and indicate there are some patterns of geographic concentration in Turlock based on familial status. For instance, Map D-43 shows a lower comparative share of children living in female-headed households outside of the city's center and a higher concentration of female-headed households living in census tracts north and west of downtown (where more than 20 percent of households are female-households). Map D-5 shows a higher concentration of married-couple households having children in the northeast portions of Turlock, in Tracts 36.11, 36.09, and 36.08, while married-couples with less percent of children and located in southern Turlock around tract 38.02, while Map D-4 shows 40-60 percent of households are married-couple households). Higher concentrations of female-headed households living north and west of downtown is likely linked to housing affordability and proximity to resources, according to Housing Division staff. In tracts more removed from the center of the city, particularly those in east Turlock, 80 to 100 percent of households are married-couple households while 20 percent or less of households are female-headed. Childcare facilities are located throughout the city and are not drawn to a specific locational direction in Turlock as shown on Map D-6. However, there is a concentration of child care centers and day care centers in census tract 39.04, which is within close proximity to tract 39.06 that has the highest percentage of female-headed households.

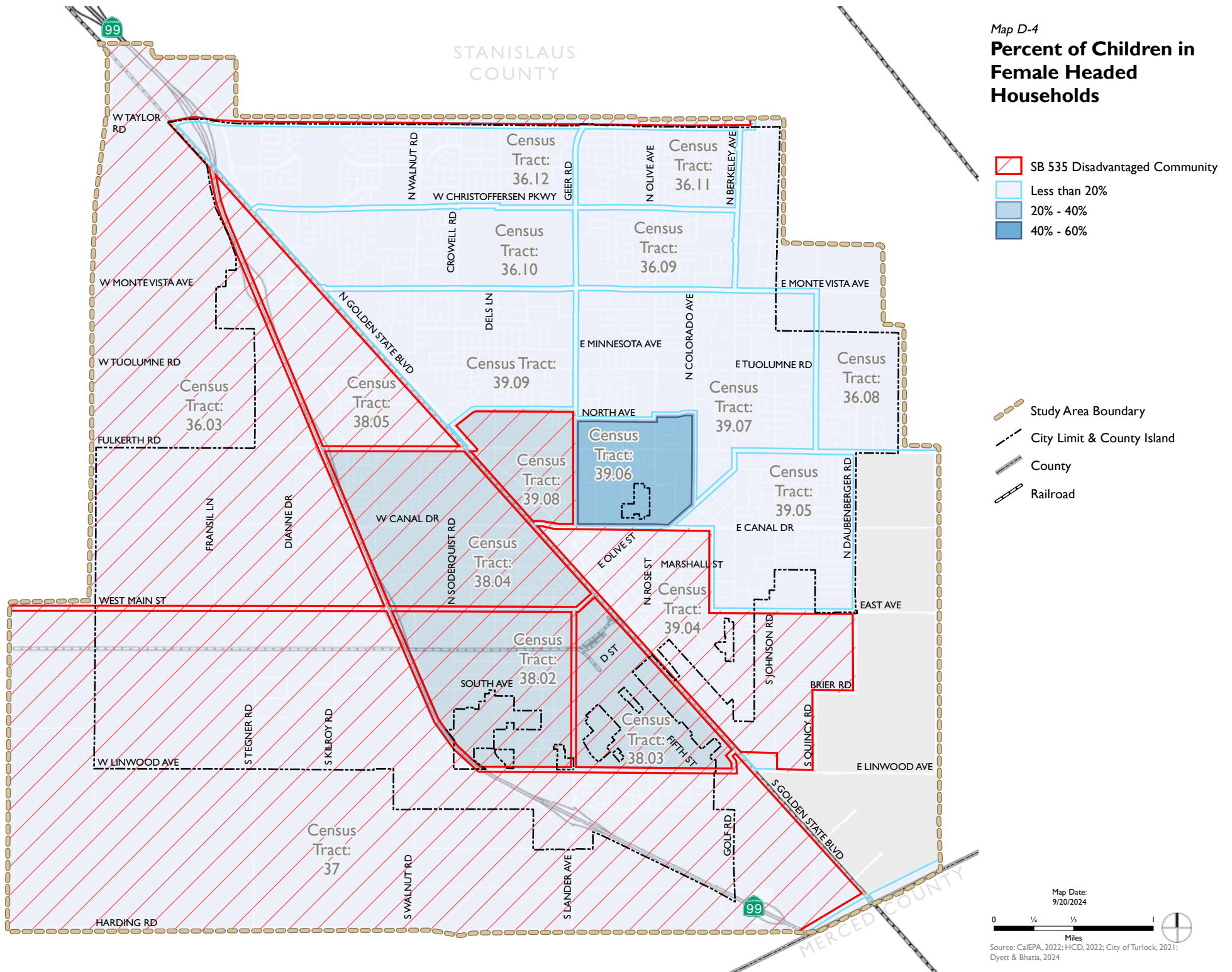
In Turlock, about 35.7 percent of female-headed households with children were under the poverty line, while only 13.1 percent of households without children were. This demonstrates that female-headed households with children are more likely to have greater housing needs and face difficulties in finding affordable housing due to their financial vulnerability. Affordable housing is not evenly distributed throughout Turlock and female-headed households are concentrated in lower resource areas. Greater access to affordable housing in areas outside the center of the city would aid in the integration of female-headed households. Outside of Turlock and Modesto, female-headed households are better integrated, but they are also less common, indicating that this may be a greater issue in the County's urban centers.

INCOME LEVEL

Geographic concentration by income, including concentration of poverty, is another type of segregation that may exist within a jurisdiction. The concentration of low- or moderate-income (LMI) individuals provides one method to gauge the extent of such segregation. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI – based on the HUD income definition of up to 80 percent area median income (AMI). Map D-75 provides the distribution of LMI block groups across Turlock; the central area of the City along South Golden State Boulevard, south of Fulkerth Road, and north of West Linwood Avenue is an LMI area, as well as the southeastern portions of the City, extending to the City limits and Merced County boundary. Higher concentrations of LMI households are located near central areas of Turlock due to older, more affordable housing located near services and transit in these areas, according to City staff.

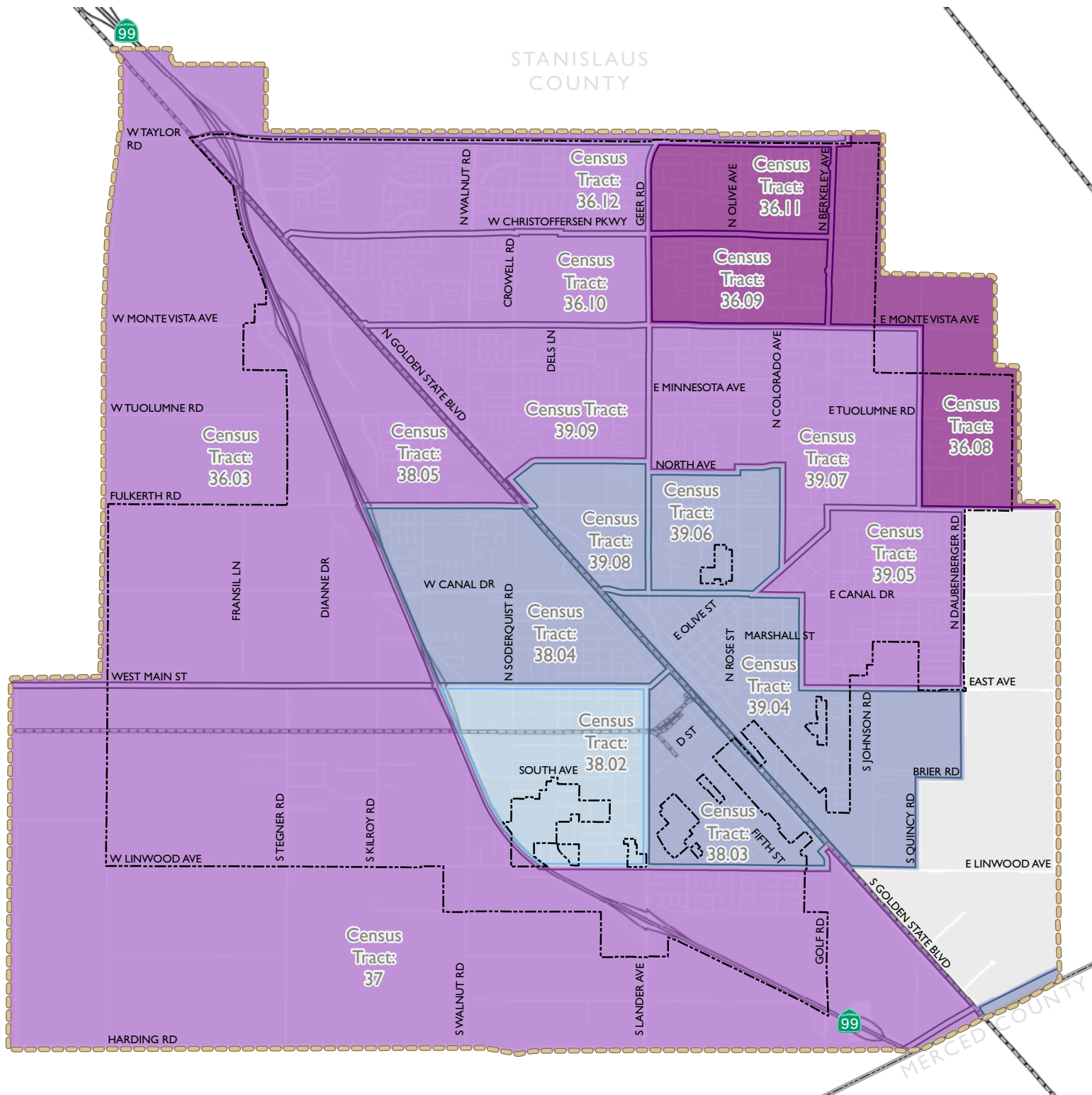
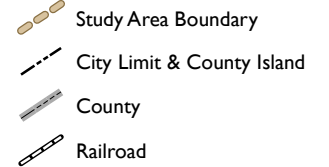
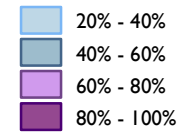
Poverty rates and the concentration of poverty over time can provide an insight into the economic wellbeing of households and individuals in the region and in Turlock. As of 2020, both Turlock (15 percent) and Stanislaus County (13.5 percent) had a higher overall rate of poverty than the State (12.6 percent). Further, as shown on Table D-3, no race or ethnicity is significantly impacted more than another, as all races/ethnicities hover around 11 to 15 percent poverty rate. Overall, the rate of poverty for most ethnic groups is lower in Turlock than the County, though Hispanic/Latino and Two or More Races experience slightly higher rates of poverty. As shown in Map D-86, areas with higher percentage of poverty are located in central Turlock and west of Golden State Road, with one census Tract 39.08 exceeding 30 percent of population below poverty line. In 2020, between renter-occupied units and owner-occupied units, 19.6 percent of people below the poverty line owned where they lived, while 80.4 percent of people below the poverty line rented. Knowing which groups locally and regionally face the greatest economic challenges can inform targeted programs for financial literacy training and other fair housing programs.

Percent of Children in Female Headed Households



Map D-5

Percent of Children in Married-Couple Households

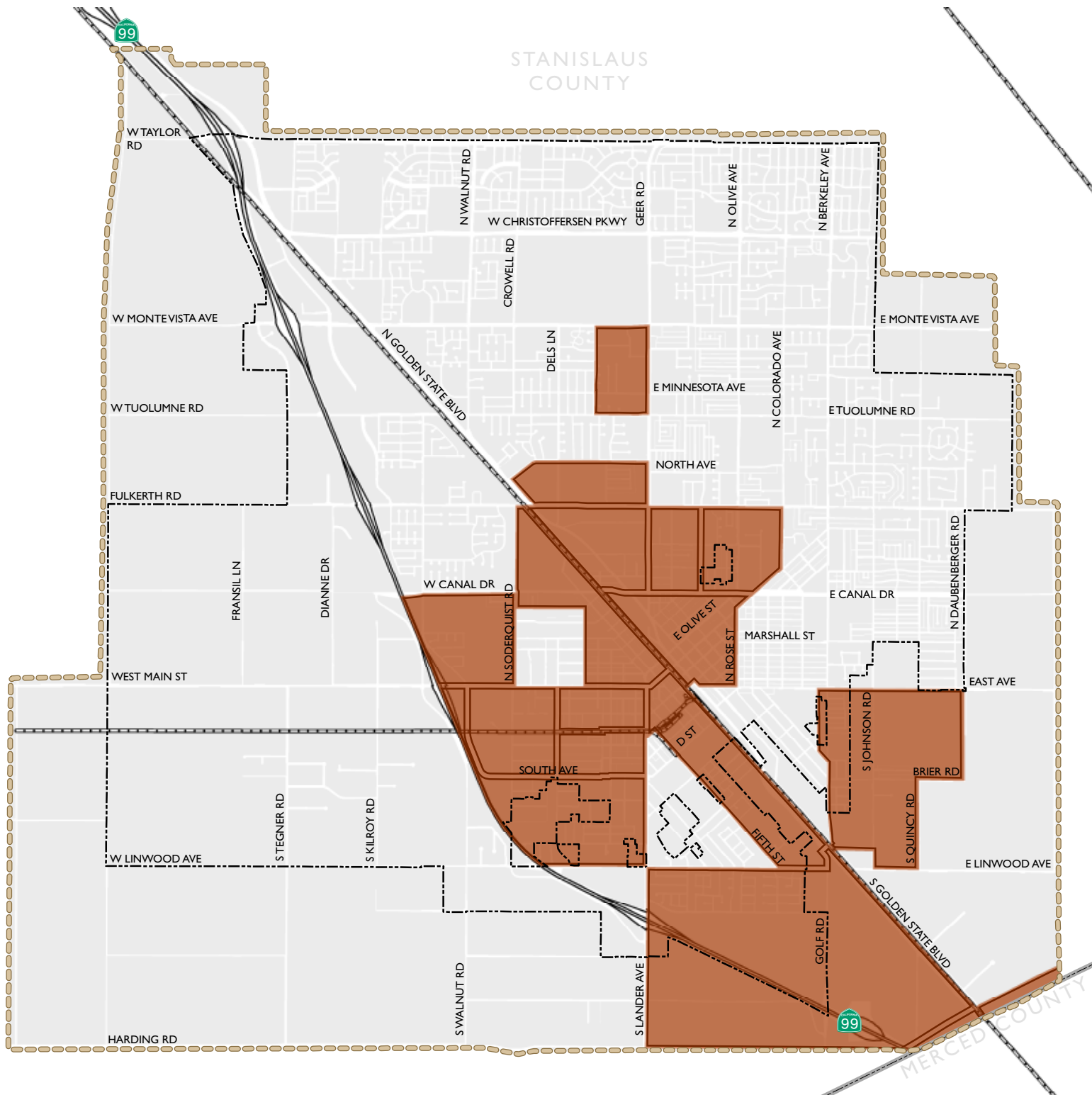


Low- to Moderate-Income Population, Block Group

Low to Moderate Income Population (HUD)

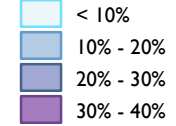
Block Groups with 51% or greater
Low to Moderate Income Population

- Study Area Boundary
- City Limit & County Island
- County
- Railroad



Map D-8
Poverty Status (2019)

Percent of Population whose income in the past 12 months is below poverty level (2017-2021)



- Study Area Boundary
- City Limit & County Island
- County
- Railroad

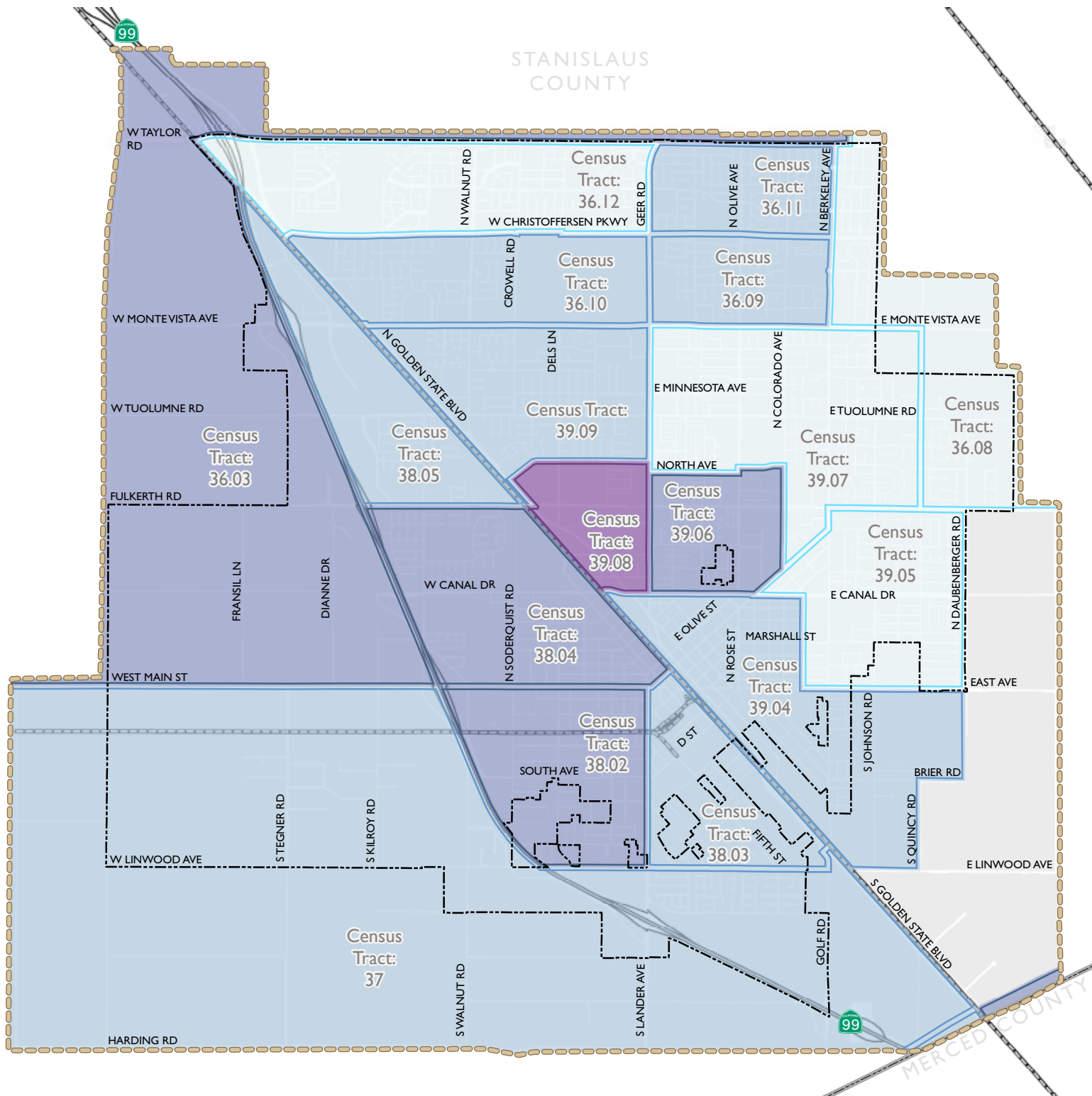


Table D-3: Poverty Status in the Past 12 Months by Race/Ethnicity, 2020

<i>Race/Ethnicity</i>	<i>Turlock</i>	<i>County</i>	<i>State</i>
White alone, not Hispanic or Latino	11.3%	11.2%	8.8%
Black alone	15.5%	19.3%	19.6%
American Indian and Alaska Native alone	13.9%	17.2%	18.4%
Asian alone	14.6%	17.5%	10.0%
Native Hawaiian and Other Pacific Islander alone	8.4%	12.1%	12.2%
Some other race alone	12.8%	12.8%	17.3%
Two or more races	13.8%	11.6%	11.7%
Hispanic or Latino origin (of any race)	15.3%	11.6%	16.2%

Source: U.S. Census Bureau, 2020 ACS 5-year estimates subject table (S1701)

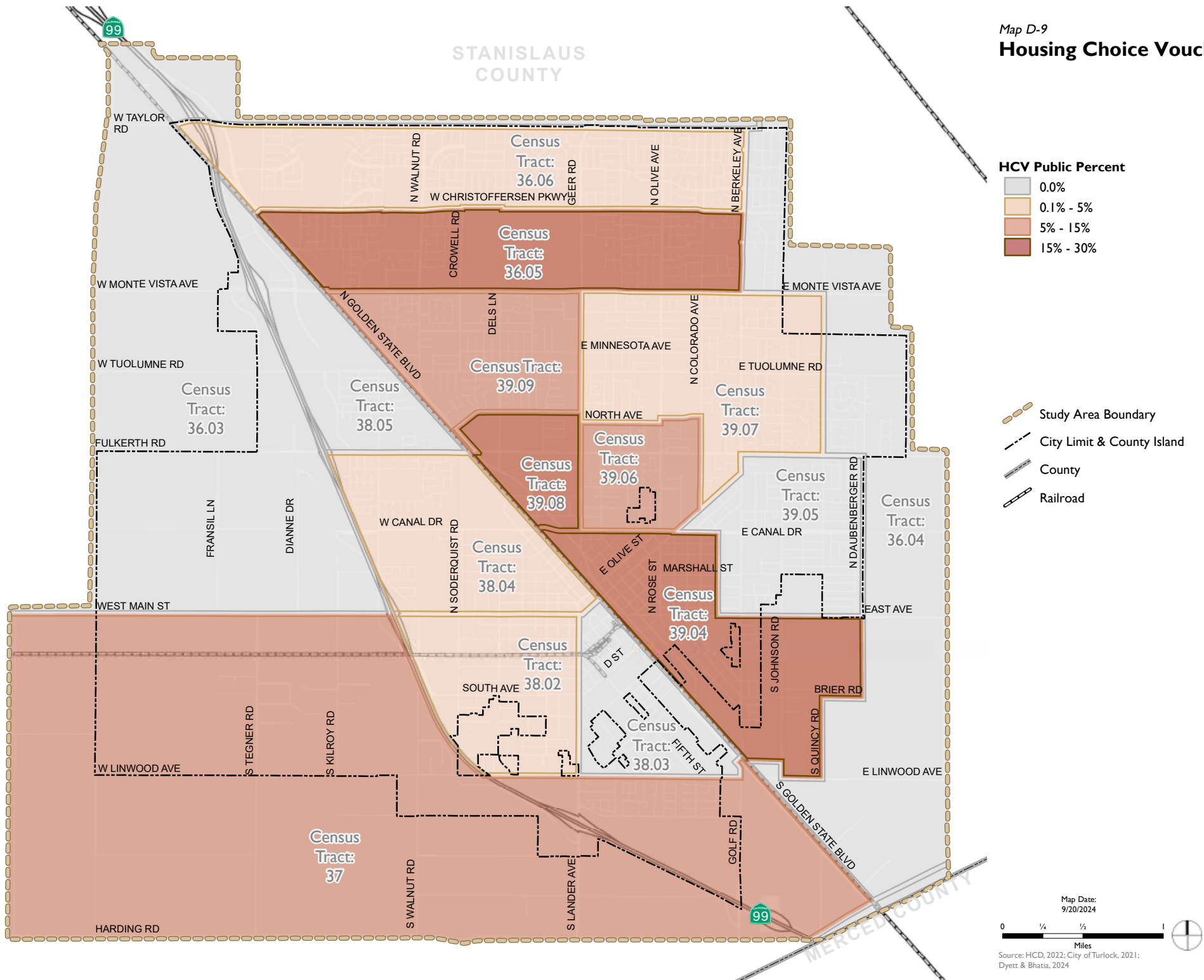
Income largely determines a household's ability to purchase or rent housing. While higher-income households have more discretionary income to spend on housing, lower- and moderate-income households are limited in the range of housing they can afford. In Turlock, most lower-income households (those making less than 80 percent of AMI) are renters, while the majority of households making above 80 percent of AMI are homeowners. Multi-family residential is heavily concentrated in tracts along North and South Golden State Boulevard, while tracts located in the northeast portion of the City are majority single-family homes. Considering the disproportionate racial/ethnic share of renters in Turlock (see Table B-27 in the Appendix B: Housing Needs Assessment) and that majority of the people below the poverty line are renters, neighborhood stabilization and homeownership strategies are pivotal in alleviating these patterns to further fair housing within Turlock. Further, expanding the areas where multifamily residential is permitted can also alleviate the concentration of poverty and low-income areas in Turlock.

HOUSING CHOICE VOUCHERS

Housing Choice Vouchers (HCVs) allow very low-income families to choose and lease or purchase safe, decent, and affordable privately-owned housing, where the choice of housing is put in the hands of the individual family. In Turlock, as seen in Map D-97, there is a concentration of Housing Choice Vouchers relative to low to moderate income population along South Golden State Road in Downtown and Geer Road. In total, there are three tracts in Turlock where 15 to 30 percent of renter occupied units use the HCVs; two of the tracts (39.08 and 39.04) overlap with block groups with 51 percent or greater of the population with low to moderate incomes, but otherwise there is little overlap between the location of HCVs and areas with lower incomes. City staff noted Stanislaus Regional Housing Authority issues over 3,000 vouchers, with rent limits based on HUD's Benefit Payment Standards. Recipients choose units based on family size, affordability, and proximity to services. City staff noted affordability was the primary concern for voucher recipients when selecting housing, rather than proximity to work. The tracts with over 15 percent of renter occupied housing units using HCVs are largely in areas determined by the Tax Credit Allocation Committee (TCAC) as Moderate Resource and High Resource; one tract, Tract 39.08, is located near Downtown within close proximity to shops, services, transit, and jobs. In Stanislaus County, Modesto is the other city with concentrations of HCV users, particularly in southwest and north Modesto. During the consultation process the Turlock/Stanislaus HOME Consortium conducted in 2022, service providers reported that potential renters find the application process daunting. Moreover, because of the shortage of affordable rental housing in Turlock and the County as a whole, landlords are able to discriminate based on voucher usage, along with other factors including protected class status.¹⁷

¹⁷ Turlock/Stanislaus County HOME Consortium, pp. 9-10.

Map D-9
Housing Choice Vouchers



Subsidized and Income Restricted Housing

There are technically two housing authorities in Stanislaus County; the Stanislaus Regional Housing Authority (SHRA) administers the programs of Riverbank Housing Authority. The Stanislaus Regional Housing Authority (SRHA), a nonprofit, public corporation, is committed to addressing the unmet housing needs of residents and communities in the county. The Authority is governed by a citizen's commission appointed by the County Board of Supervisors. In addition to the HUD subsidized units, Low-Income Housing Tax Credits (LIHTC), general funds, and state housing funds are also used to develop affordable units; however, Stanislaus County's recent housing production using LIHTC, is low compared to the rest of the state.

Together, SHRA and Riverbank Housing Authority provide access to 6,335 subsidized housing units that include 736 public housing units, 1,060 project-based Section 8 units, and 4,460 housing choice vouchers (as of when the Stanislaus County 2020-2025 AI was published). Since 2008, HUD has recognized SHRA as "high performing" because it scores a cumulative 90 out of 100 points for a variety of inspection points (physical condition, financial condition, and management). A challenge many housing authorities face, SHRA has long waiting lists for its units with a waiting time of ten years for public housing and only occasional openings for housing choice voucher applications.

Between 2016-2018, only 55 low-income housing units were created in the County compared to 18,803 in the rest of the State. Modesto's HUD-funded affordable housing stock comprised more than 70 percent of the affordable housing in the County. As of 2018, 4.6 percent of Turlock's housing stock qualified as affordable units (1,202 units or 19.1 percent of all affordable units in the County).¹⁸ As of 2018, Stanislaus County had 6,302 affordable units (3.5 percent of housing stock). In summary, Turlock and Modesto are where subsidized housing is concentrated within the County, with an even greater concentration existing within Modesto.

There are subsidized housing options located throughout Turlock that are income restricted and accept HCVs:

- **Avena Bella Apartments.** Avena Bella Phase 1 introduced 28 income restricted units, while Phase 2 provides 61 income restricted units. Avena Bella is located on the southern edge of Turlock.
- **Cherry Tree Village.** Cherry Tree Village is an income restricted apartment complex with 104 units, located in the northern part of Turlock.
- **Crane Terrace Apartments.** Crane Terrace is a senior restricted complex with 44 income restricted units, located in the western part of Turlock.
- **Denair Manor.** Denair Manor is a senior restricted complex with income restrictions located in central Turlock.
- **Parkwood Apartments.** Parkwood has 178 income restricted units and is located the northern part of Turlock.
- **Turlock Silvercrest.** Silvercrest is a senior restricted complex with 78 income restricted units, located in the southern part of Turlock.

¹⁸ 2018 HUD Picture of Subsidized Housing data; DP04, Selected Housing Characteristics, ACS 5-year estimates (2013- 2017)

- ~~**Avena Bella Apartments.** Avena Bella Phase 1 introduced 28 income restricted units, while Phase 2 provides 61 income restricted units. Avena Bella is located on the southern edge of Turlock.~~
- **Lake Park Apartments/Villas at Parkside.** Lake Park has 103 income restricted units in central Turlock.
- ~~**Parkwood Apartments.** Parkwood has 178 income restricted units and is located the northern part of Turlock.~~
- ~~**Crane Terrace Apartments.** Crane Terrace is a senior restricted complex with 44 income restricted units, located in the western part of Turlock.~~

Map D-10 shows the subsidized housing options located throughout Turlock that are income restricted and accept HCVs. Most are located in central Turlock such as Villa at Parkside, Denair Manor, Crane Terrace Apartments and Silvercrest Residence, with close proximity to Downtown and access to transit. The southern most subsidized housing option is Avena Bella Apartments, located on the southern edge of Turlock adjacent to Highway 99. Notably, there are no subsidized housing options in northeastern Turlock, where the census tracts are High and Highest Resource.

Buildout of the inventory would increase the share of LMI households in Highest and High Resource tracts in Turlock and decrease that share of LMI households in Moderate Resource tracts, thereby improving the overall balance of income segments in different areas throughout the residential part of the city. Further, the development of ADUs/JADUs and affordable housing on properties owned by religious institutions through the congregational overlay (Program 1-F) would create additional housing opportunities for LMI households in High and Highest Resource areas beyond as further discussed and shown in Table D-8. These strategies would further contribute to a better balance of housing types within the community, would increase affordable housing and access to opportunity for lower and moderate income households in High and Highest Resource tracts in Turlock.

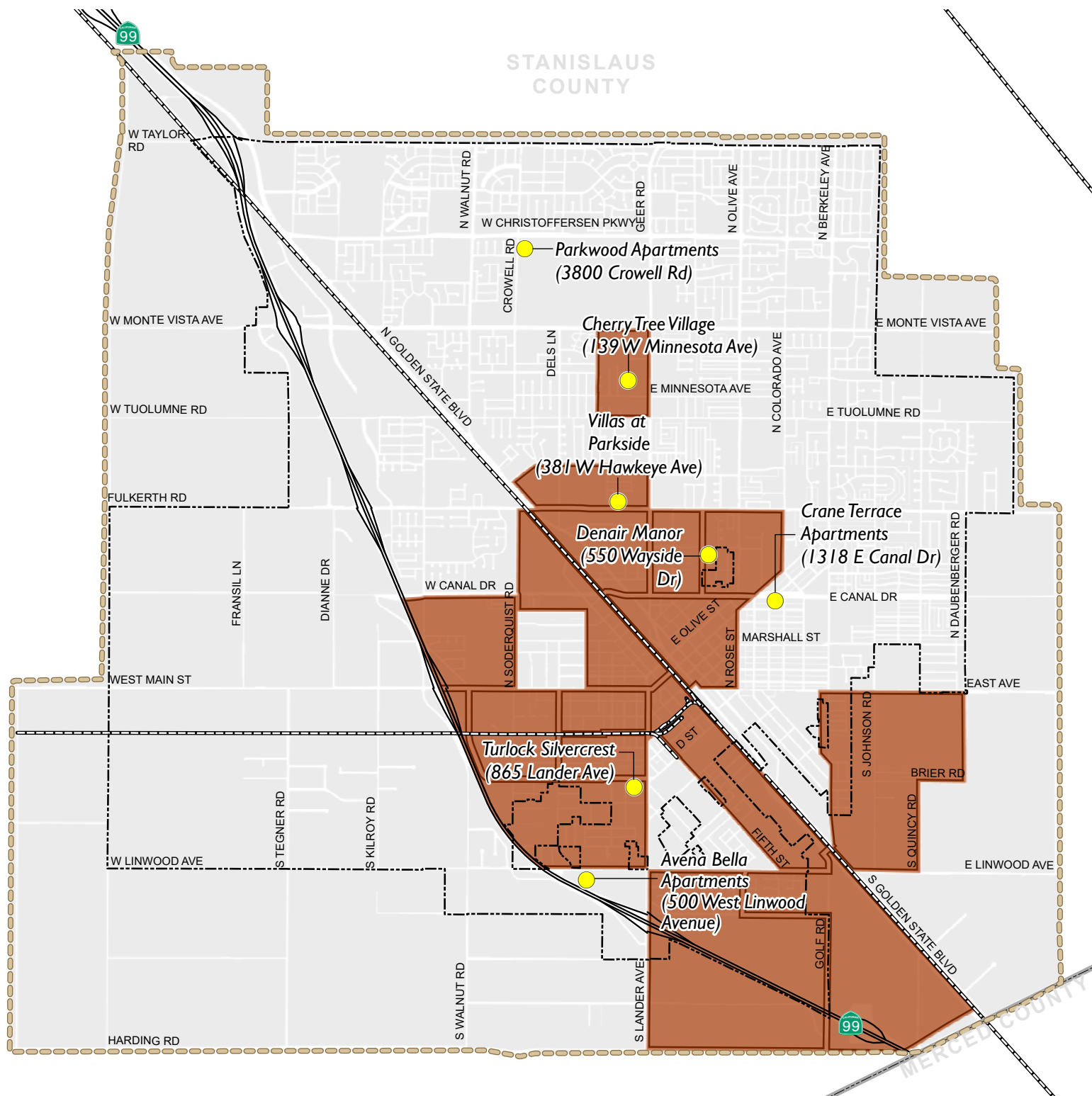
Location of Publicly Subsidized Housing in Turlock

 Subsidized Housing Developments

Low to Moderate Income Population (HUD)

 Block Groups with 51% or greater Low to Moderate Income Population

 Study Area Boundary
 City Limit & County Island
 County
 Railroad



D.3 Racially/Ethnically Concentrated Areas of Poverty and Affluence

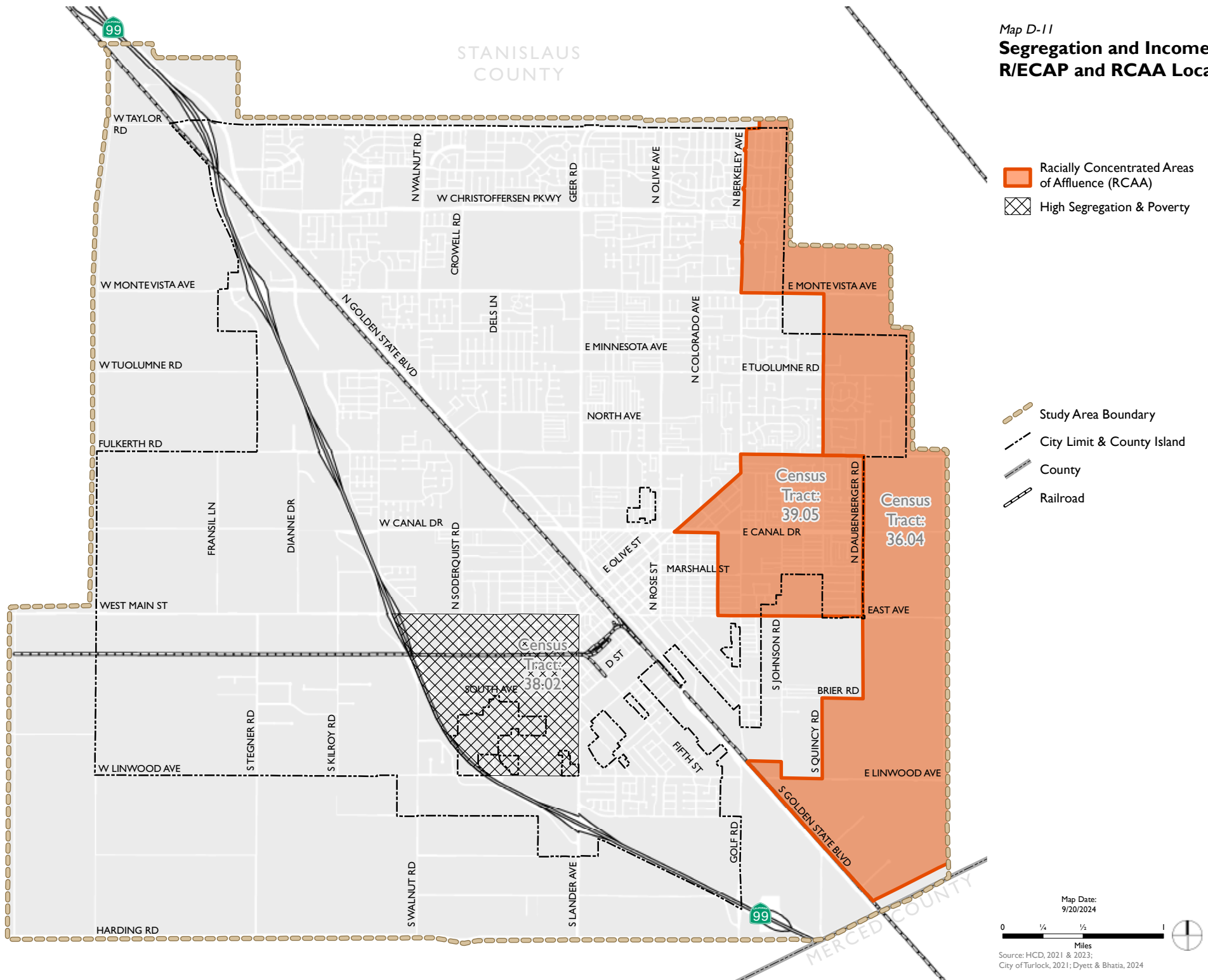
HUD defines racially or ethnically concentrated areas of poverty (R/ECAPs) as census tracts where 50 percent or more of the population is non-White and more than 40 percent of the households have incomes below the poverty line or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. There are five R/ECAPs in the central part of Stanislaus County, where Turlock, Modesto, and Ceres, the three most populous cities in the county are located. None of these R/ECAPS are in Turlock but one census tract (Tract 38.02) in Turlock does meet the Tax Credit Allocation Committee/HCD criteria as a High Segregation and Poverty (HSP) tract (Map D-118). The California Tax Credit Allocation Committee and HCD (TCAC/HCD) established a Fair Housing Task Force that created an alternate set of criteria that it considered more appropriate for evaluating access to opportunity than the HUD R/ECAP criteria. Because using absolute thresholds could result in comparisons among very different areas of the state (e.g. rural farming communities and dense, urbanized neighborhoods in coastal cities), the TCAC/HCD approach scores census tracts relative to other tracts in the same region. The methodology filters areas meeting standards for both racial segregation (overrepresentation of people of color relative to the entire county) and poverty (30 percent of the population living below the poverty line) and rates them according to scores based on nine economic, educational and environmental indicators. The higher composite scores mean more access to resources that offer residents a better chance at economic advancement, positive educational outcomes, and better physical and mental health.¹⁹

As discussed above, Turlock has only one census tract that meets the criteria for designation as High Segregation and Poverty compared with four in Modesto and one in Ceres. In Turlock, Tract 38.02 - the High Segregation and Poverty tract is bordered on the west by SR-99, intersected by the railroad, and includes three unincorporated county islands. ~~Tract 38.03, to the east, also has three county islands and is identified as a Low Resource area using the TCAC/HCD criteria.~~ The population of ~~these two tracts and Tract 38.04~~ is predominantly Hispanic, ~~ranging from 51.4 to 73.91 percent Hispanic according to the 2020 decennial Census~~. Since 1990, Tract 38.02 has seen an increase in Hispanic or Latino residents and a decrease in non-Hispanic White residents that reflects Turlock's overall demographic changes ~~(Table D-4)~~.

From 2010 to 2020, the percentage of households living below the poverty line increased more in Tract 38.02 than it did citywide (1.8 in the HSP tract compared 0.5 citywide). As of 2020, the average income in the HSP census tract was \$41,580 while in Turlock ~~as a whole~~ it was \$78,930, almost 90 percent higher.

¹⁹ Office of The State Treasurer (STO), California Fair Housing Task Force, 2020. Methodology for the 2020 TCAC/HCD Opportunity Map. Available: <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>

Segregation and Income, R/ECAP and RCAA Locations



Residents of ~~the HSP census tracts~~ Tract 38.02 are more likely to be renters than elsewhere in Turlock. Although the proportion of renter-occupied housing in Turlock only increased by 2.1 percent between 2000 and 2010, the percentage of renter occupied housing in the ~~HSP census tracts~~ Tract 38.02 increased 12.9 percent, with 70.2 percent of ~~the HSP~~ residents in renter occupied housing in 2020. ~~Due to the proximity to SR-99 and various railroad tracks, Tract 38.02 is heavily exposed to pollution burden, as displayed by the low Economic Score on Map D-11. However, there are various completed and planned capital improvement projects for this area of Turlock, namely multiple road rehabilitation projects and reconstruction of the Colombia Park swimming pool that improve the quality of life of residents.~~

~~Tract 38.02 is designated as Disadvantaged Community (DAC) under SB535, indicating it has a high share of lower income residents disproportionately impacted by pollution and adverse health outcomes. Calenviroscreen data, developed by the State to help characterize conditions in DACs throughout California, indicates that Tract 38.02 ranks in the 95th percentile for pollution exposure and the 94th percentile for rate of poverty statewide. Given its proximity to SR-99, exposure to fine particulate matter (92nd percentile) and diesel particulate matter (0th percentile) in the tract also ranks among the highest in California, although it should be noted that there are a total of 8 DACs in Turlock and Tract 38.02 is not substantially more impacted by pollution than other DACs, nor is the rate of poverty more acute. This area is mostly zoned as high density residential within City limits, with some low density residential housing located sparingly throughout the county island. Within the county island, low density residential development is the predominant land use, with a significant number of vacant and/or underutilized parcels. In this area, the development of the Workforce Housing Overlay would allow housing development at up to 35 du/ac on major corridors like Lander Avenue. Turlock planned for the development and financing of this area by relying on the subdivision process and creating the Montana West Master Plan Area.~~

~~Existing land use in Tract 38.02 is predominantly residential, with a mix of single-family and multifamily homes in both the incorporated and unincorporated parts of the tract. Other notable land uses include Wakefield Elementary School, Montana Park, three churches and various heavy commercial/industrial uses adjacent to the freeway in the western part of the tract. Current zoning generally matches existing land use, with areas in the northern incorporated part of the tract zoned for High Density Residential uses and areas in the southern incorporated part of the tract zoned for Low Density Residential uses, with areas adjacent to the freeway zoned Industrial. Census data does not indicate a preponderance of substandard housing in the area, although the City received several applications for rehabilitation grants from property owners between 2014 and 2023, suggesting there is some need for rehabilitation of homes in the area. Program 3-E in the Action Plan identifies a series of projects to improve infrastructure, amenities and quality of life in Turlock's disadvantaged communities, including Tract 38.02. These projects include construction of the Columbia Pool, support buildings and restrooms, to serve neighborhoods in southwest Turlock, and repavement and rehabilitation of various street segments and installation of ADA-compliant ramps and resurfacing and re-striping of the multi-purpose court at Columbia Park.~~

~~Tract 38.02 and other centrally located tracts typically contain older housing stock that was constructed prior to the 1980s. Unlike Turlock's newer subdivisions, these areas do not have assessment districts that providing funding for roadway construction and maintenance. Therefore, to improve roadway conditions in older residential neighborhoods without assessment districts Turlock and Stanislaus voters have passed two ballot measures that provide ongoing sources of funding for improvements. With the approval of Measure A, a three-quarter cent transactions and use (sales) tax, the Turlock City Council has committed 55 percent of this new revenue to its Roads Program. For the last two fiscal years, the City has allocated \$36.2 million to its Roads Program from Measure A dollars alone. With the additional assistance of a \$29.5 million-dollar bond issuance and the County Measure L program, within fiscal year 2024-2025 the City has budgeted \$48.4 million in expenditures for the Roads Program with 89 percent going toward construction.~~

The City's financial forecast for the Roads Program projects this trend of allocation of resources to continue for the next three to five fiscal years.

This area is mostly zoned as high density residential within City limits, with some low-density residential housing located sparingly throughout the county island. Within the county island, low density residential development is the predominant land use, with a significant number of vacant and or underutilized parcels. In this area, the development of the Workforce Housing Overlay would allow housing development at up to 35 du/ac on major corridors like Lander Avenue. Turlock planned for the development and financing of this area by relying on the subdivision process and creating the Montana-West Master Plan Area.

As noted above, Tract 38.02 contains three unincorporated county islands. Stanislaus County is working to address infrastructure needs within unincorporated developed neighborhoods of the County, including County Islands in the Turlock sphere of influence. In recent years the County has tried to guide infrastructure improvements and support the annexation of unincorporated pocket areas to surrounding cities. This includes prioritizing residential neighborhoods with public health and safety needs with installation of sewer mainlines, and potable water systems. In May 2021, the Board of Supervisors approved its priorities for use of \$107 million in American Rescue Plan Act of 2021 (ARPA) funding allocated to Stanislaus County. To date of the \$107 million, \$55.8 million has been assigned to Community Infrastructure – Urban Pockets/County Communities. ARPA funds provide a unique opportunity for Stanislaus County to make substantial progress strategically on the infrastructure needs in its urban pockets and County communities. Additionally, separate from the Housing Element process, the City of Turlock has applied for REAP funding to prepare a master plan for the future annexation of seven unincorporated County islands and associated public infrastructure improvements, including the three islands within Tract 38.02. The master plan will identify infrastructure funding and financing strategies.

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF AFFLUENCE

HCD provides a standard definition for Racially/Ethnically Concentrated Areas of Affluence (RCAAs) as a “census tract where 1) 80 percent or more of the population is White, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016).”²⁰ The Stanislaus Council of Governments and some other Councils of Governments (COGs) use a more flexible definition, which is an area where the percentage of non-Hispanic White residents is more than 1.25 times the average in the COG region and the median income is at least 1.5 times higher than the COG AMI.

Map **D-118** shows the locations of RCAAs under this definition; within Turlock, two RCAAs are located along the very eastern edge of the city and one RCAA located outside the city to the east. The RCAA tract in Turlock is 71.6 percent White (Hispanic or Latino), has a median income of \$92,500, has 79.6 percent of units occupied by owners, and 98.2 percent of homes are single family dwellings (the highest percent in all Turlock tracts). To the east of Turlock, in the unincorporated community of Denair, the population is 64.6 percent White (Hispanic or Latino and non-Hispanic or Latino), with a median income of \$93,060, has 100 percent of units occupied by owners, and 94.1 percent of homes are single family dwellings. Also within the region, are several census tracts identified as RCAAs surrounding the city of Oakdale, northeast of Turlock, which is in the Modesto MSA.

²⁰ Office of The State Treasurer (STO), California Fair Housing Task Force, 2020. Methodology for the 2020 TCAC/HCD Opportunity Map. Available: <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>

The existing concentrations of poverty and affluence may have been created and sustained by zoning practices in Turlock. Table D-4 shows the percentage of multi-family housing in the HSP tract opposed to the highest resource tracts (Map [D-128](#)). Compared with Turlock’s overall percentage of structures with single units and the percentage within the census tract identified as High Segregation and Poverty, the highest and higher resource tracts have a greater percentage of single unit structures than multi-unit structures. Notably, only 3.3 percent of structures within the RCAA tract have two or more units while the percentage of structures in all of Turlock, while structures with two or more units is at 26.5 percent. By contrast, it is noteworthy that while the proportion of renter-occupied housing in Turlock increased by only 2.1 percent between 2000 and 2010, the percentage of renter occupied housing in the HSP census tract increased 12.9 percent, with 70.2 percent of the HSP residents in renter occupied housing in 2020. Proposed revisions to zoning regulations including the development of Congregational Overlay and incentives for deed restricting accessory dwelling units (ADUs) that increase opportunities for developing multi-unit and more affordable housing in the higher resource areas in the northern part of the city could lead to a more even distribution of population by income level.

Table D-4: Units In Structures by TCAC and Census Tract, 2020

<i>TCAC Designation</i>	<i>Tract</i>	<i>1 Unit</i>	<i>Percentage of 1 Unit</i>	<i>2+ Units</i>	<i>Percentage of 2+ Units</i>
Highest Resource	36.05	4,716	80.9%	1,115	19.1%
Highest Resource	39.09	2,003	80.1%	499	19.9%
Higher Resource	36.06	3,192	84.7%	575	15.3%
Higher Resource (RCAA)	39.05	1,513	96.7%	52	3.3%
Higher Resource	39.07	2,375	82.4%	509	17.6%
High Segregation & Poverty (R/ECAP)	38.02	1,316	75.2%	433	24.8%
City of Turlock	All	18,664	73.5%	6,724	26.5%

Source: U.S. Census Bureau, Census 2020 ACS Five-Year Estimates (Table A10032)

D.4 Disparities in Access to Opportunity

The CTAC-HCD Task Force Opportunity Maps identify the census tracts with the highest and lowest resources within each region of California, which can be used to analyze disparities in access to opportunities in three categories (domains)--economic, environmental, and education. The maps use specific indicators in each domain to determine a score for each census tract. The highest resource tracts are the top 20 percent of census tracts with the highest index scores relative to the region and high resource tracts are the next 20 percent. The remaining tracts are then evenly divided into the low resource and moderate resource categories. Opportunity maps for each of three domains show how census tracts within each city, county, or region compare with one another. Table D-5 lists the indicators the State used to create the composite scores for each domain, which are further aggregated to create a composite index that determines each tract's resource level.

A neighborhood's score for each economic and educational indicator is determined by whether it falls above or below the median (50th percentile) tract or block group value within the city. Each indicator that falls above the median adds one point to the final score. Additional information about each of the nine indicators and their data sources is provided in the California Fair Housing Task Force, Methodology for Opportunity and High-Poverty & Segregated Area Mapping Tools, January 2024. The Methodology also provides the rationale for and research underlying each of the indicators used to create the composite scores.

Table D-5: Opportunity Indicators and Measures for HCD/TCAC Opportunity Maps

<i>Indicators</i>	<i>Measure</i>
Economic	
Above 200 % Poverty	Percent of population above 200 % of Federal poverty line
Adult Education	Percent of adults with bachelor's degree or above
Employment	Percent of adults aged 20-64 employed in the civilian labor force or in armed forces
Median Home Value	Value of owner-occupied units
Environmental Burden	CalEnviroScreen 4.0 site-based pollution indicators
Education	
Math Proficiency	Percent of 4th graders who meet or exceed math proficiency standards
Reading Proficiency	Percent of 4th graders who meet or exceed literacy standards
High School Graduation Rates	Percent of high school cohort that graduated on time
Student Poverty Rate	Percent of students not receiving free or reduced-price lunch

Source: California Fair Housing Task Force, Methodology for Opportunity and High-Poverty & Segregated Area Mapping Tools, January 2024

REGIONAL CONTEXT

HUD has developed a mapping tool that cities can use to identify disparities in access to opportunity within a region. The tool uses census data to generate indicators for scoring census tracts. The higher the index score, the better an area's access to opportunity. The following indicators are scored on a scale from zero to 100.

- Low Poverty — A measure of the degree of poverty in a neighborhood, at the Census tract level.
- School Proficiency — School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high- and low-performing elementary schools.
- Labor Market — Measure the relative intensity of labor market engagement and human capital in a neighborhood based on employment levels, labor force participation, and education attainment.
- Low Transportation Cost — Estimates of transportation costs for a three-person, single-parent family with income at 50 percent of the median income for renters for the region.
- Transit — Estimates of transportation trips taken by a three-person, single-parent family with income at 50 percent of the median income for renters for the region.
- Jobs Proximity — Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region or other statistical area. Larger employment centers, like Turlock and Modesto in Stanislaus County, are more heavily weighted.
- Environmental Health — Summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index, the lower the exposure to toxins.

The Stanislaus County Fiscal Year 2020-2025 Regional Analysis of Impediments to Fair Housing Choice (AI) explores the distribution of five of these types of opportunity: transportation, education, employment, **transportation**, access to low poverty neighborhoods, and access to environmentally healthy neighborhoods.

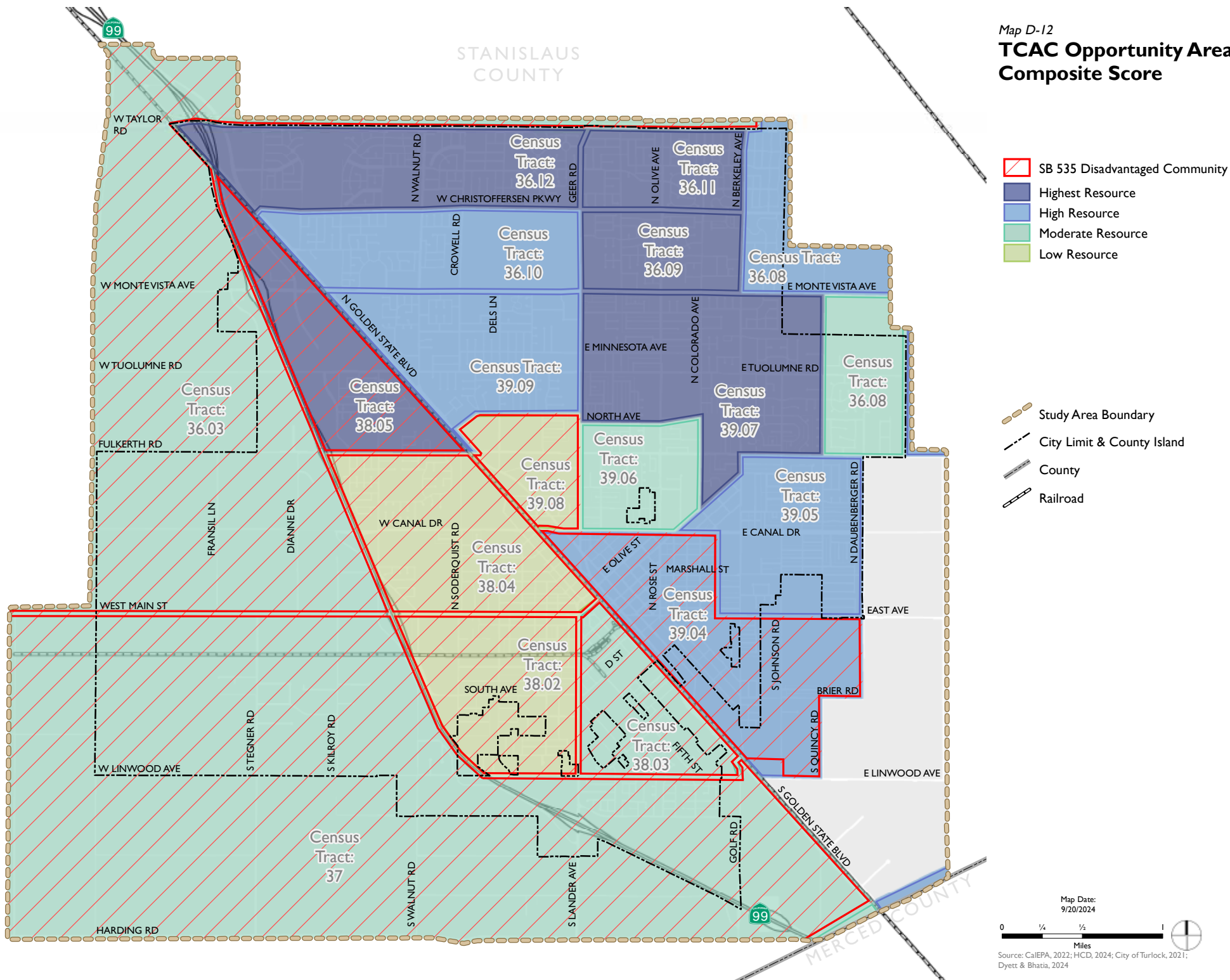
Chart D-6 and Chart D-7 below shows index scores based on the July 2020 HUD data release. In the Stanislaus County region and in Turlock, access to opportunity is generally highest for non-Hispanic Asian and Pacific Islander residents. Residents who identify as Hispanic or non-Hispanic Native American, on the other hand, have the lowest access to opportunity while non-Hispanic White as well as non-Hispanic Black people live in a wider variety of neighborhoods. The major exception to this is the relatively high labor market index scores of non-Hispanic Black, Hispanic, and non-Hispanic Asian and Pacific Islander residents in Turlock outside the Modesto region. Similar patterns are evident for the total population and those that live below the poverty line, as shown in Chart D-7.

CONTEXT

According to the TCAC Opportunity Areas composite score as shown on Map **D-129**, there is high variation in resource categories in the City of Turlock, as areas identified as Highest, High, Moderate and Low Resource are located throughout Turlock. The Highest Resource areas in the city are in the northern part of the city, generally north of West Christoffersen Parkway and east of Geer Road, while Moderate Resource tracts are west of SR-99 and in the east, and the Low Resource areas in the center of Turlock east of SR-99, as well as southeast by the Merced County boundary. Modesto, the largest city in the region, has a similar distribution of opportunity areas, though includes more tracts that meet the definition of High Poverty and Segregated, while smaller cities including Patterson and Riverbank are more homogeneous with a more limited range of classifications, usually Low and Moderate Resource, among their census tracts.

STANISLAUS COUNTY

Map D-12 TCAC Opportunity Areas, Composite Score



Economic Indicators

The Task Force methodology uses four indicators to measure economic opportunity: poverty, adult education rate, employment rate, and the median home value of owner-occupied units. Four tracts with less positive economic outcome are adjacent to one another and mostly located west of Golden State Boulevard, along with Tract 39.08 on Geer Road and North Golden State Boulevard (see [Map D-139](#)). Overall, Turlock has slightly more tracts classified under less positive economic outcomes than those tracts classified as more positive economic outcomes. Tracts with more positive economic outcomes, scoring greater than 0.8, align with Highest and High Resource areas in the east and north of Turlock.

Touched upon in Chapter 2 of the Draft Housing Element in more depth, there are 31,746 persons in the labor force in the City of Turlock. The largest industry represented among Turlock workers is Health and Educational Services (27.7 percent) which is a greater share of the workforce represented in the industry compared to the county (21.4 percent). Compared to Stanislaus County, employees in the Construction industry account for significantly less of Turlock's employment distribution (6.4 percent) than that of the county (8.9 percent). Further, the following four major employers provide the largest employment base for residents: Foster Farms Poultry, Turlock Unified School District, Emanuel Medical Center, and California State University Stanislaus, aligning with the two largest industries: Health & Educational Services and Manufacturing, Wholesale and Transportation. All four major employers have an employment base of at least 1,000 people, according to the Stanislaus County Comprehensive Economic Development Strategy 2023-2028. Additionally, Turlock is well-known for its agricultural setting, which has historically provided a basis for the city's industry. Food processing is the primary industry, providing a large number of industrial and manufacturing jobs. Turlock also boasts an agri-business cluster, with several new emerging technical software and laboratories to bolster this cluster.

According to California Employment Development Department Local Area Unemployment Statistics (LAUS), Turlock experienced an unemployment rate of 5.6 percent in 2024. While this rate is a 52.5 percent decrease from unemployment rates in 2011, it is a 16.7 percent increase from the 2020 unemployment rate (4.8 percent). However, this is still relatively lower than the 7.7 percent unemployment rate for Stanislaus County in 2024.

~~According to ACS 2022 five-year estimates, there are 31,746 persons in the labor force in the City of Turlock in 2022. The largest industry represented among Turlock workers is Health and Educational Services (27.7 percent) which is a greater share of the workforce represented in the industry compared to the County (21.4 percent). Compared to Stanislaus County, employees in the Construction industry account for relatively less of Turlock's employment distribution (6.4 percent) than that of the county (8.9 percent).~~

The tract-level share of employed adults has been shown to be highly correlated with rates of upward economic mobility for low-income children. Adult unemployment is commonly considered to be an indicator of neighborhood disadvantage that affects not just the individuals who do not have jobs, but members of the entire community. Turlock's non-White Hispanic and Latino identifying residents have the lowest Labor Market Index scores followed by non-Hispanic Native Americans, then non-Hispanic Black residents. This pattern extends to Stanislaus County, although the Labor Market Index scores are overall lower in the County than in Turlock (see Chart D-7). In terms of unemployment, Countywide, 70.7 percent of unemployed residents identify as White, with 53.7 percent of them identifying as Hispanic or Latino and 46.3 percent as non-Hispanic or Latino, which is proportional to the county's demographics. In Turlock, 47.2 percent of the White non-Hispanic or Latino population is unemployed, which is comparable to Turlock as 48 percent of the population is White non-Hispanic.

TCAC Opportunity Areas, Economic Score

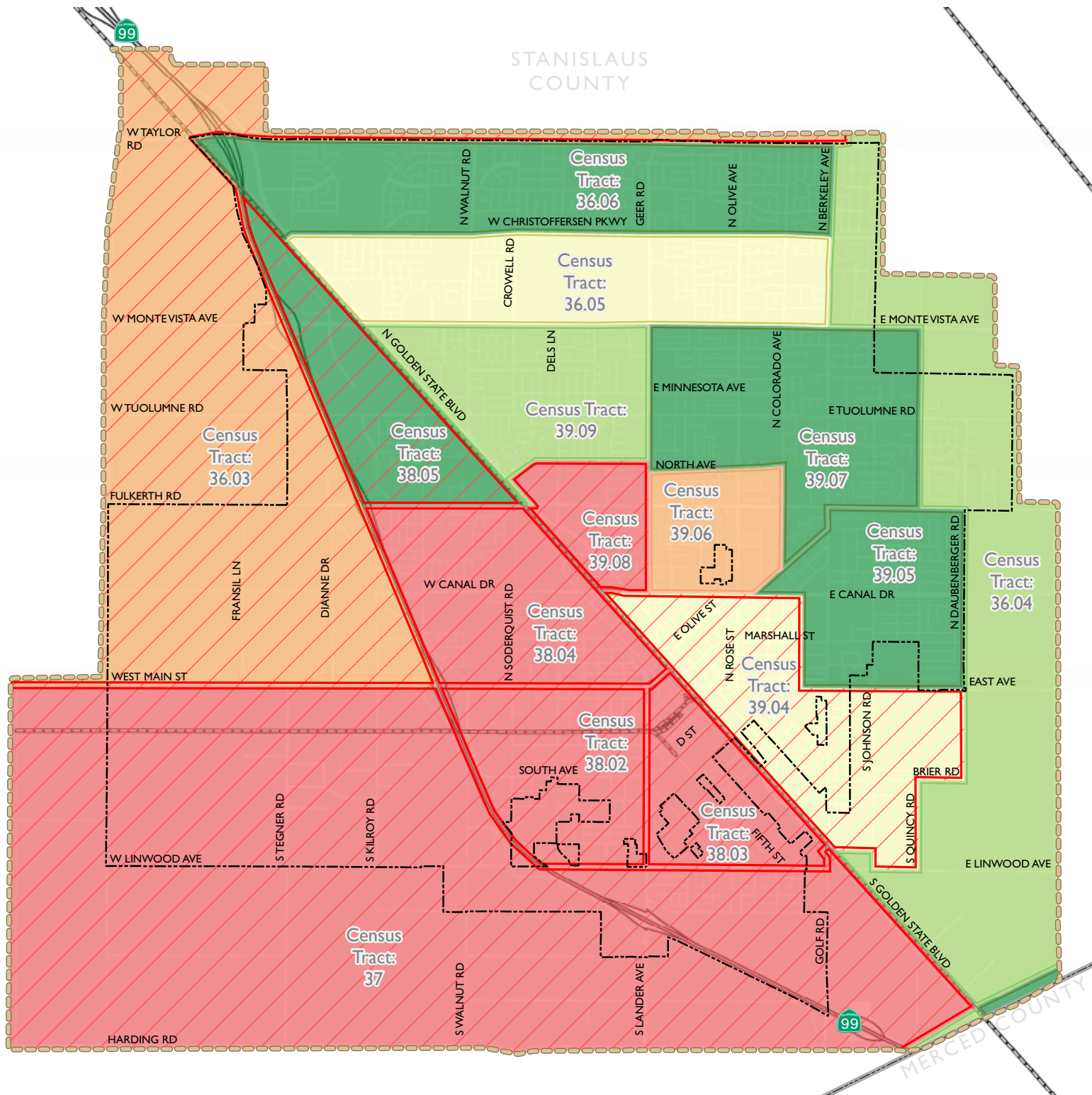
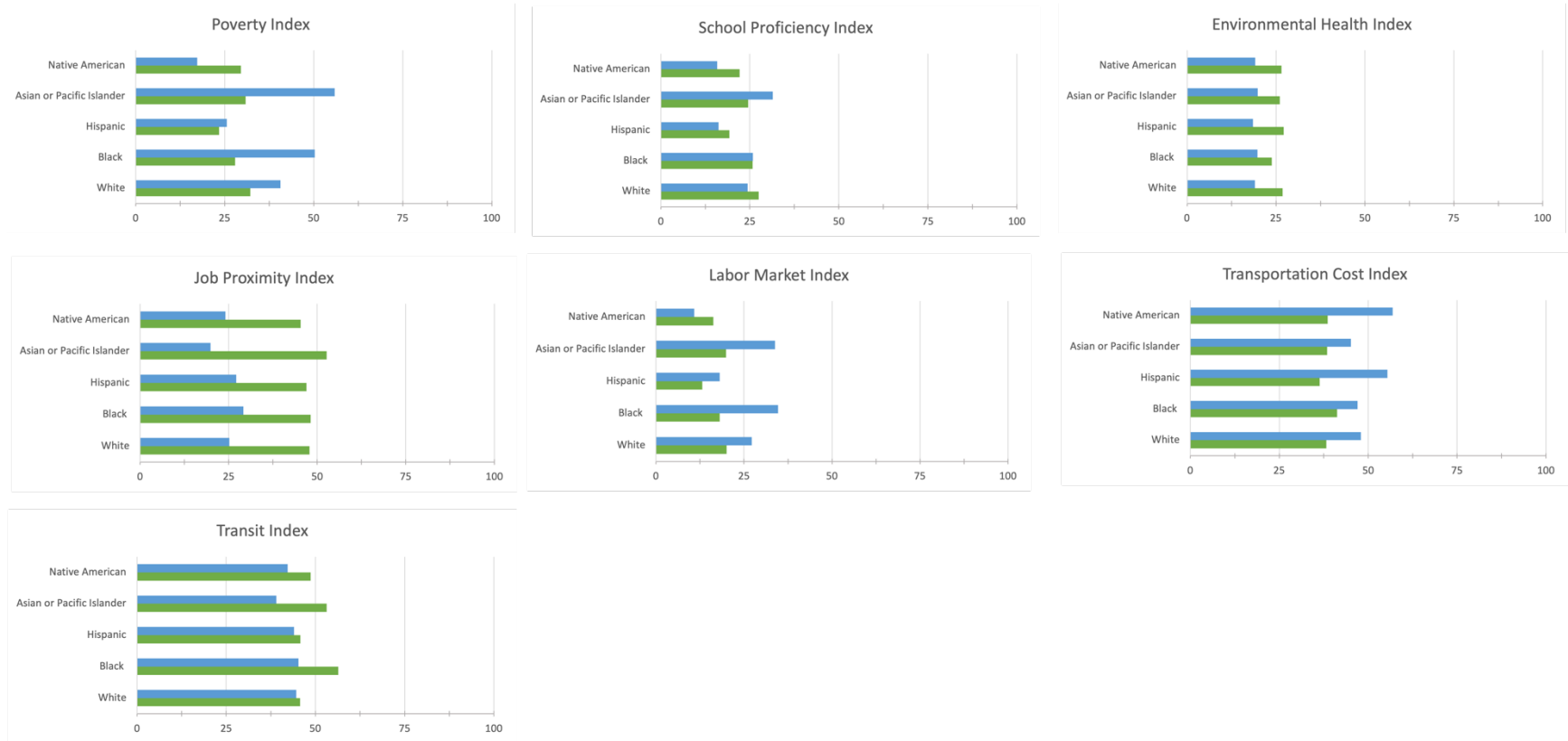


Chart D-6: Opportunity Indices, Population Living Above the Poverty Level



Source: HUD, AFFHT0006 Table 12, July 2020

Chart D-7: Opportunity Indices, Population Living Below the Poverty Level



Source: HUD, AFFHT0006 Table 12, July 2020

The Jobs Proximity Index, which measures the physical distance between place of residence and jobs, is similar among all the census tracts in Turlock. However, the data does show differences among race and ethnicities within each tract. Non-White Hispanic residents have the highest Jobs Proximity Index score followed by non-Hispanic Native American and -Hispanic Black residents, who comprise a significant proportion of the city's non-White workers. This means they live close to where they work relative to the White population, as shown in Chart D-7. Turlock is 17 square miles, making access to work in various parts of it or other job centers such as Modesto possible by car. Commute patterns discussed in Chapter 2, Community Profile noted that 71.3 percent of workers in Turlock commute from outside the city, while 7,985 residents live and work in Turlock. Turlock residents can travel throughout Turlock with seven transit routes, where each route connects to the Turlock Transit Center, so residents can also reach Modesto, Ceres, and Keyes by a regional bus route that runs throughout the day.

One of the most pressing issues affecting the world today is the digital divide, a term referring to the gap between those who have access to the internet and related technology and those who do not. The gap impacts individual economic opportunities and outcomes and is most likely to affect lower-income households, people with disabilities, and woman. Map D-14 shows distribution of households with no computer or internet subscription in Turlock. Census tracts with the highest percentage of households with lack of internet access are found in south Turlock (census tract 38.02 and 38.03), as well as central Turlock (39.06). Tract 38.02 is the only tract in Turlock designated as a High Segregation and Poverty tract, while tract 39.06 has the highest concentration of female-headed households. The Task Force methodology uses four indicators to measure economic opportunity: poverty, adult education rate, employment rate, and the median home value of owner-occupied units. Four tracts with less positive economic outcome are adjacent to one another and mostly located west of Golden State Boulevard, along with Tract 39.08 on Geer Road and North Golden State Boulevard (see Map D-9). Overall, Turlock has slightly more tracts classified under less positive economic outcomes than those tracts classified as more positive economic outcomes. Tracts with more positive economic outcomes, scoring greater than 0.8, align with Highest and High Resource areas in the east and north of Turlock.

The City is currently in the process of updating the most current economic development strategic plan and is expected to be completed in Fall 2025. The current plan provides detailed updates of demographic, retail and industrial market data to provide a firmer foundation for City economic development efforts going forward. The updated plan will expand on this data and develop a new strategy to update the City's economic development program.

In addition to the City's efforts, there are significant, multi-year economic development programs and initiatives in Stanislaus County that are designed to influence the jobs landscape in the next ten years. The Stanislaus 2030 Investment Blueprint is a comprehensive, collaborative strategy among business, government, and civic stakeholders with the goal of creating more quality jobs and improving financial well-being. Its strategies include talent development, entrepreneurship and small business dynamism, and removal of non-skill barriers to jobs and training. Catering to the food and agricultural sectors of Stanislaus County and Turlock specifically, under Stanislaus 2030, the BioEconomy, Agriculture, & Manufacturing (BEAM Circular) is a key traded-sector initiative focused on the circular bioeconomy within food and agricultural systems. This initiative has received significant funding and is expected to create a large number of quality jobs in bioindustrial manufacturing and related fields.

There are several organizations working to improve access to economic opportunity in Turlock and the greater Modesto region. Opportunity Stanislaus assists communities with their workforce readiness process, introducing people to financial incentives and financing programs, and by helping them locate appropriate sites and buildings to meet their needs. The organization's vision is to attract jobs that give

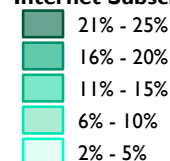
more buying power to the workforce. Turlock works in collaboration with the Valley Sierra Small Business Development Center (SBDC), an arm of the Central California Small Business Development Center, whose mission is to help businesses start, grow, and succeed in the Modesto region. SBDC offers workshops, trainings, and classes for businesses, entrepreneurs, and individuals. It also acts as a resource center for new businesses with owners located in Stanislaus County and Tuolumne County, providing ongoing support to existing businesses. SBDC does not offer grants or loans itself but works closely with financial partners who offer a variety of loan programs, as well as other regional and community funding sources. In addition to support for small businesses, SBDC also provides workforce development services.

All together, these resources offer a variety of ways to access economic opportunity in Turlock likely influenced by variation among the area's industries and workforce skills and experience. The tracts with lower economic opportunity are the tracts concentrated where there are also concentrations of female-headed households, people falling under the poverty line, and multi-family housing. These tracts are likely where low wage workers can afford to live. Access to jobs for groups facing socioeconomic challenges is high as indicated by the Jobs Proximity Index score, likely due to proximity to industries with need for low-wage workers. The Labor Market Index score is higher in Turlock than the County, influenced by Turlock being considered one of the County's two urban centers with job centers and a university. Additionally, economic opportunity is supported by the presence of organizations discussed above working to improve workforce readiness and attract business development throughout the County.

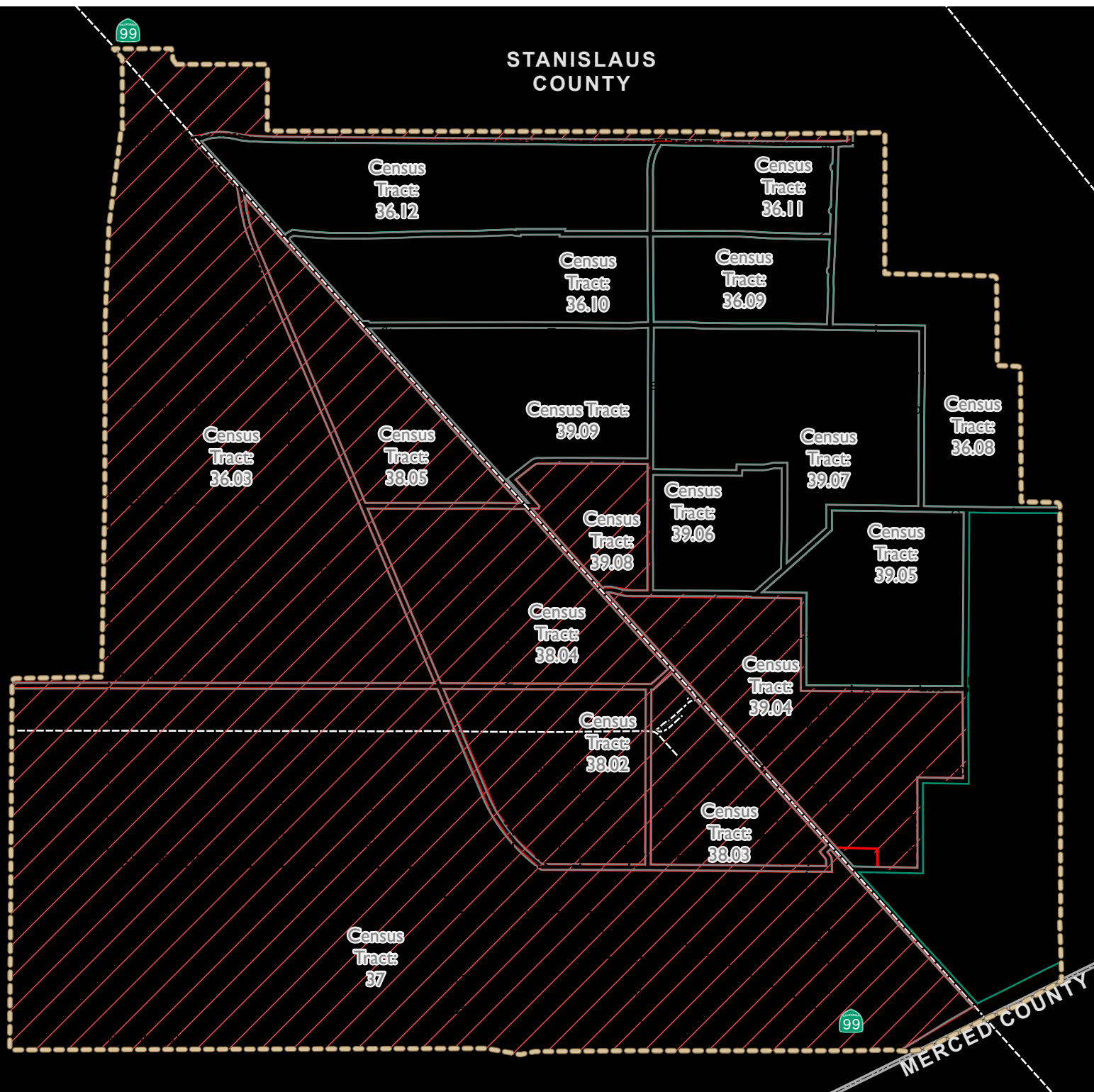
Lack of Internet Access in Turlock

 SB 535 Disadvantaged Community

Households with No Computer or Internet Subscription



-  Study Area Boundary
-  City Limit & County Island
-  County
-  Railroad



Educational Indicators

There are 25 school districts in Stanislaus County, two of which serve Turlock: the Turlock Unified School District (TUSD) or Chatom Union School District (CUSD). Most of Turlock is in the Turlock Unified School District (TUSD). TUSD provides public elementary, middle, high school, in addition to an adult school and a charter school. TUSD elementary school facilities includes Brown Elementary School, Crowell Elementary School, Cunningham Elementary School, Earl Elementary School, Julien Elementary School, Medeiros Elementary School, Osborn Two-Way Immersion Academy, Wakefield Elementary School, and Walnut Elementary Education Center. TUSD middle school facilities include Dutcher Middle School and Turlock Junior High School, while TUSD high school facilities include Pitman High School, Turlock High School, and Roselawn High School. In terms of geographic availability, schools are spread throughout the city. However, there are more TUSD facilities in central Turlock, near Downtown, due to the school district main office and E Cademy Charter At Crane School being located there. CUSD has three facilities, two of which, Crowell Elementary and Crowell pre-school on Clayton Road in the unincorporated area, serve the western parts of tracts 37.00 and 38.02 between West Main Street and Harding Road. Crowell also serves the more sparsely populated unincorporated area to the west. About 85 percent of the Crowell students are economically disadvantaged, meaning their families are below the poverty line, and 76 percent are minority. Crowell's math and reading scores compare poorly with the Turlock Unified School District (15 percent in math and 28 percent in reading compared with 31 and 40 percent in the TUSD).

TUSD assigns students to schools based on their geographic attendance zones, known as "home residence" schools. If families would like to attend a different school within the district, they must submit an intra-district transfer (referred to as a "school of choice" application). However, selection is not guaranteed, as approval is required before enrollment at a non-home school. There are about seven private schools in Turlock. For new master planned area, like the Morgan Ranch Master Plan Area, a new elementary school will be developed and operated by the Turlock Unified School District, as stated in the Morgan Ranch Master Plan. Elementary school design guidelines state the school will be located central to the Morgan Ranch community and to the existing neighborhoods to the north.

Table D-6 summarizes test score results from the 2021-2022 Smarter Balanced assessments of math and English Language Arts (ELA), which forms part of the State's California Assessment of Student Performance and Progress (CAASPP). The proportion of students who meet or exceed standards in ELA or math in Turlock is higher than in Stanislaus County, but lower than in the State. When comparing test results between the two high schools in Turlock, Turlock High School had 23.4 percent of its students meet or exceed the standard for overall achievement and John H. Pitman High had 29.9 percent of its students meet or exceed the standard for overall achievement. Turlock High School serves the south and southeastern part of Turlock while John H. Pitman High School serves the more western and northern part of the city.

Table D-6: CAASP Scores

District/Region	Percent Met or Exceeded Standard	
	English Language Arts	Mathematics
State of California	47.1%	33.4%
Stanislaus County	37.7%	23.1%
Turlock Unified	40.4%	25.3%

Source: California Department of Education, CAASPP, Smarter Balanced Summative Assessments, 2021-2022

Students of color in Turlock received lower test scores in both math and English than non-Hispanic White students. While non-Hispanic White students received scores (53.0 percent in English and 38.0 percent in math) that are greater than the State and County averages (see Table D-6), students of color received higher scores than the County averages but lower than the State (43.9 percent in English and 30.1 percent in math). In terms of the County, students of color are doing better in Turlock but there is still an educational gap within the city between White and non-White students. Notably, Black (29.7 percent in English and 13.3 percent in math) and Hispanic (32.6 percent in English and 17.2 percent in math) students received the lowest scores while other races/ethnicities scored closer to the average in the city. Barriers to educational opportunity for students of color might relate to housing choice because census tracts with lower educational opportunity scores also have higher shares of the Hispanic and Black populations of the city. Other barriers that are probably contributing to the gap include language, economic factors, and the lack of educational resources between White students and students of color in Turlock.

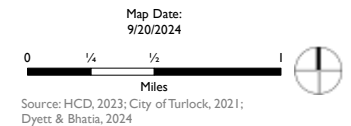
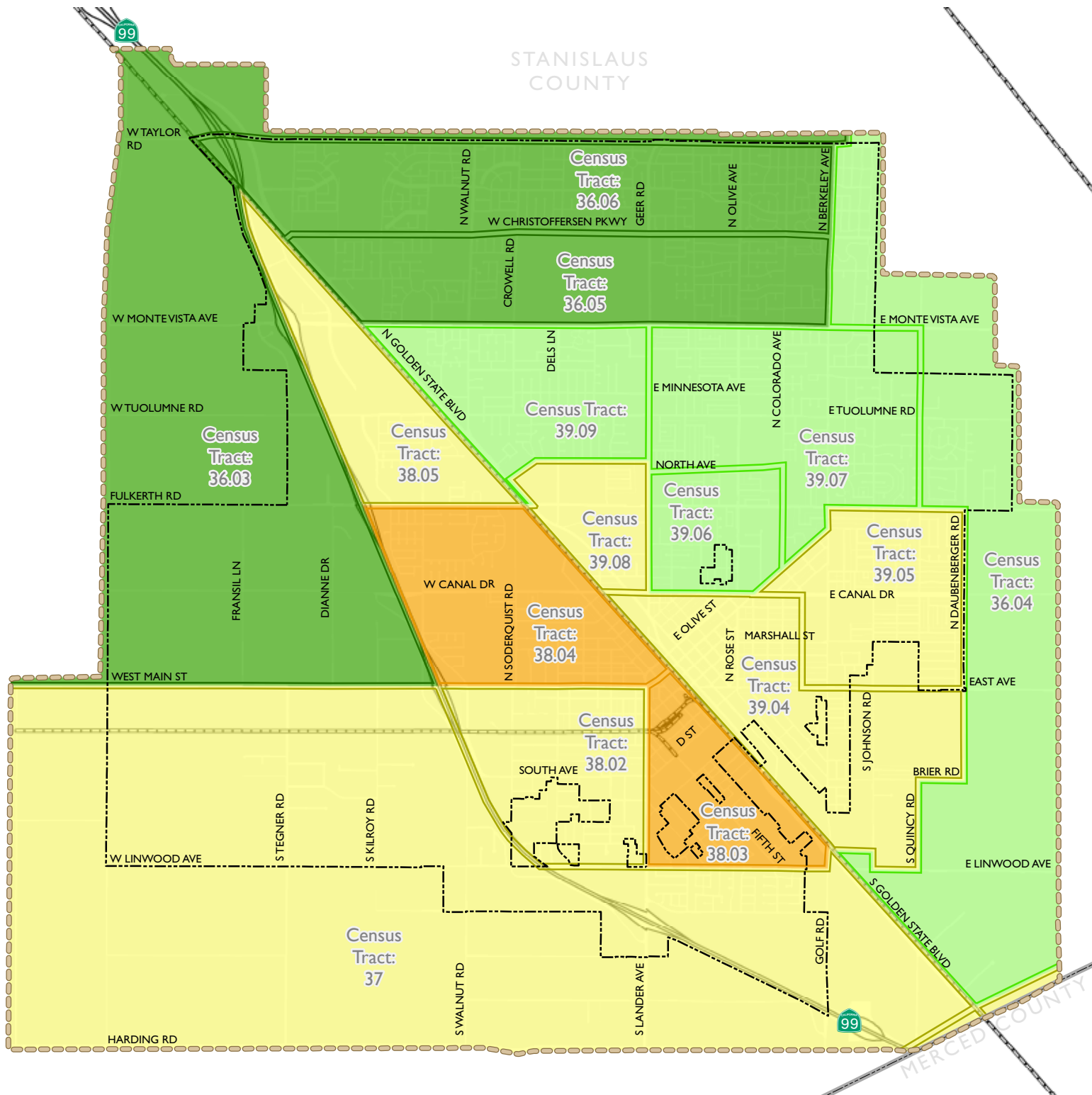
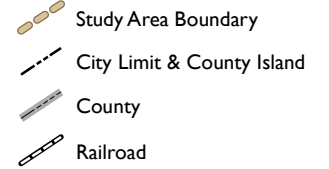
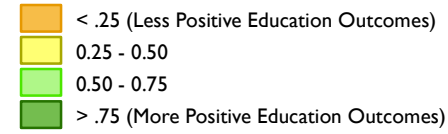
As Turlock experiences lower levels of educational opportunity compared to the State, both TUSD and CUSD are proactively taking steps to improve scholastic performance for local students and expand on campus support services through a variety of specialized efforts. CUSD provides instructional support programs that include homework support and academic intervention including math and reading and after-school childcare program that provides supervision, homework support, and recreational activities. Further, TUSD operates a Family Resource Center that provides resources, programs, and services to diverse Turlock families, that include school readiness programs for students in need, parent workshops, food distribution drives, and mobile health clinics. Although there are some areas in the City with lower educational opportunity scores, overall Turlock scores higher than the County and its students of color fare better than students on average in the County. Programs provided by CUSD and TUSD can continue to improve the educational opportunity of students in Turlock. Huntington Learning Center of Turlock is an education partner with local schools in Turlock and neighboring communities, located in Downtown Turlock. From individualized to high-dosage tutoring, certified teachers provide support to educators and school districts to help accelerate learning for students through Huntington's accredited programs and data-driven approach to learning. Valley First Tutoring also offers tutoring services in Turlock that could help improve educational outcomes, located along North Golden State Boulevard.

The TCAC Opportunity Areas education score, which quantifies access to educational opportunity, is provided in Map D-154. Eight of Turlock's fifteen tracts, including the area served by the Chatom District, have the second lowest range of education scores, four have outcomes ranging from .50 to .75, and three fall into the "more positive education outcome" category with outcomes above .75. The two most northern census tracts with the best education outcome scores are in the area served by Pitman High School, while none of the tracts with the best education outcome scores are in Turlock High School's boundary. Although there may be a slight difference in the two school boundaries' outcomes, the High Segregation and Poverty tract (tract 38.02) and the Racially Ethnically Area of Affluence tract (tract 39.05) are both located in the lower-performing Turlock High School boundary. Though The Racially Alt Though there are some areas in the city with lower educational opportunity scores, overall Turlock scores higher than the County and its students of color fare better than students on average in the County.

In terms of upper education and vocational opportunities, TUSD also operates the Turlock Adult School that offers a Career Technical Education (CTE) program. The CTE program integrates core academic knowledge with technical and occupational knowledge in order to provide students a pathway to careers and/or post-secondary education in Turlock. Courses include: Associate Child Development Certification, Basic Auto Repair, Certified Nursing Assistant, Code Academy, Digital Skills Boot Camp, Forklift Safety Certification, Microsoft Office Specialist, Professional Truck Driving, QuickBooks Essentials, and Welding, Combination.

Map D-15

TCAC Opportunity Areas, Education Score



Environmental Indicators

The environmental opportunity score in the TCAC Opportunity Map is based on CalEnviroScreen 4.0 pollution indicators and values, as shown on Map D-162. The CalEnviroScreen is a mapping tool that helps identify communities disproportionately burdened by multiple pollution sources and with population characteristics making them more sensitive to pollution areas in the state that are most impacted by various sources of pollution. The tool uses data score considers of four major types of indicators: exposure (e.g., air quality, lead risk, etc.), environmental effects (e.g., cardiovascular disease, asthma, hazardous waste facilities, solid waste sites, etc.), socioeconomic factors (e.g., poverty, unemployment, etc.), and sensitive populations (health conditions that are sensitive to pollution, such as asthma and cardiovascular disease). This data is combined into a single score for each census tract and compared to all other tracts in the state through ranking, with a high-ranked score indicating high pollution burden and high levels of population characteristics that can increase people's sensitivity to pollution's effects. The tracts in the highest 25% of scores are then designated as "Disadvantaged communities" (DACs). This designation is part of complying with SB 535 (De Leon, 2012), which requires funds from the State's Cap and Trade Program to be used for programs to reduce emissions of greenhouse gases, with a portion of the funds to projects that provide a benefit to disadvantaged communities (DACs) as identified by the California Environmental Protection Agency (CalEPA). Assembly Bill 1550 (Gomez, Chapter 369, Statutes of 2016) established the currently applicable minimum funding levels:

- At least 25 percent of funds must be allocated toward DACs.
- At least 5 percent must be allocated toward projects within low-income communities or benefiting low-income households, and
- At least 5 percent must be allocated toward projects within and benefiting low-income communities, or low-income households, that are outside of a CalEPA-defined DAC but within ½ mile of a disadvantaged community.²¹

as defined in by CalEnviroScreen 4.0 data are only located in the southwest portion of Turlock, these DACs are in the southwestern part of the City, including Downtown and tracts south and west of Golden State Boulevard (Turlock's DACs are Tracts 36.03, 37, 38.02, 38.03, 38.04, 38.05, 39.04, 39.08, and can be seen in Map D-1). The area's proximity to industrial land uses and SR-99 freeway, the volume of truck traffic on local roads serving auto-service businesses, the presence of hazardous materials facilities and solid waste sites, and drinking water quality contribute to the tracts' high scores. Leaking underground storage tanks can threaten groundwater quality, and Map D-17# shows that Turlock has a high concentration of these sites Downtown and south of Golden State Boulevard.²² The risk of childhood lead exposure from older homes with lead-based paint follows the same spatial pattern, concentrated in Downtown and south of Golden Gate Boulevard. Map D-18 shows that hazardous waste generators and facilities are more dispersed throughout the city, with the eastern part of the city as an exception. As detailed in Table C-16 in the Constraints Analysis, many hazardous sites within Sixth Cycle Housing Element Opportunity Areas are concentrated along Geer Road, a north-south arterial in the middle of the City, Golden State Boulevard, and Downtown, where these roads intersect. Solid waste sites and facilities, by contrast, are concentrated in

²¹ CalEPA, California Climate Investments to Benefit Disadvantaged Communities

<https://calepa.ca.gov/envjustice/ghinvest/> and

<https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/>

²² Office of Environmental Health Hazard Assessment, Groundwater Threats.

<https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats>

the southwestern corner of the City in Tracts 38.02 and 37 (Map D-19#). Turlock has historically relied on groundwater from the Turlock Groundwater Subbasin.²³ In 2023, it began introducing surface water purchased from the Stanislaus Regional Water Authority and obtained from the Tuolumne River through a Surface Water Integration Project to provide a more resilient water supply. Arsenic and 1,2,3-trichloropropane exceeded the maximum contaminant level (MCL), the highest level of contaminant allowed in drinking water, in Turlock's water supply in 2024.²⁴ When these compounds are consumed in high concentrations, there is an increased risk of cancer. Nitrate levels also approached the MCL, which can pose health risks to infants and pregnant individuals. The City's Municipal Services Department is closely monitoring contaminant levels. Being surrounded by farmland, agricultural pesticide exposure is high throughout the city, with the highest scores at the perimeter and in Downtown – Tracts 39.06 and 39.08 in the center of the city have no agricultural pesticide data available. Exposure to particulate matter (PM) is also present throughout the city, with high scores for PM 2.5 exposure in all tracts except Tracts 36.03 and 36.04, and high diesel PM exposure in tracts bordering the freeway (Tracts 38.02, 38.04, and 38.05).

Environmental opportunity considers pollution in an environment, but also amenities in an environment, such as tree canopy coverage and access to parks, community facilities, healthy foods. Tree canopy coverage throughout Turlock is lower than the State average, with slightly higher tree canopy coverage just east of Downtown.²⁵ Parks are present throughout the city, but there is a lower concentration in Downtown and none in the southwestern corner of the city. Relatively large parks are concentrated in the northern section of Turlock. Residential areas in the southern corners and center of the City are not within 10-minute walking access to a park (see Map D-21-#). Map D-21# also shows cultural and recreational facilities, community centers, and public libraries, which are concentrated on both sides of Golden State Boulevard near Downtown. Data on access to healthy food retailers has limitations, as it requires a threshold of employees or sales to be classified as healthy and may undercount places such as meat and fish markets, ethnic food markets, and other places that could sell healthy foods.²⁶ According to the Modified Retail Food Index, access to healthy food retailers is higher than the state average in Tracts 38.03, 38.04, 36.07, and 39.05, and below the state average in Tract 38.02, and no healthy retailer data in all other tracts.²⁷ The Turlock Farmers' Market is in Tract 39.04.

The U.S. Department of Housing and Urban Development (HUD)'s Environmental Health Index metric summarizes potential exposure to harmful toxins at a neighborhood level. In contrast with CalEnviroScreen's scoring value pattern, the higher the index, the lower the exposure to toxins. ~~m~~For the population above ~~the~~ poverty level in the City, all races and ethnicities scored between 19 and 20 for the Environmental Health Index (see Chart D-6). Asian or Pacific Islander residents scored the highest (20.9) and Hispanic residents the lowest, although not by much (19.4). Among those under the poverty level, a similar trend was inferred, Asian or Pacific Islander residents scoring the highest (19.8) and Hispanic residents the lowest, ~~again, not by much~~ with a similarly slim delta (18.5). ~~For both those~~The City's

²³ City of Turlock. Surface Water Integration Project. <https://ci.turlock.ca.us/srwa/>

²⁴ City of Turlock. July 1, 2025. 2024 Water Quality Report. https://www.cityofturlock.org/_pdf/files/CCR_2024.pdf

²⁵ Public Health Institute. California Healthy Places Index 3.0. <https://map.healthyplacesindex.org/?redirect=false>

²⁶ California Department of Public Health. Healthy Communities Data and Indicators Project – Retail Food Environment. https://www.cdph.ca.gov/Programs/OHE/CDPH%20Document%20Library/HCI/Food%20Security%20and%20Nutrition/HCI_%20ModifiedFoodRetailEnvironment_Narrative_2022_2023-11-08.pdf

²⁷ California Department of Public Health. Modified Retail Food Environment Index 2022. <https://www.arcgis.com/apps/dashboards/ed14abbe27e54abcae7457799b06fc7>

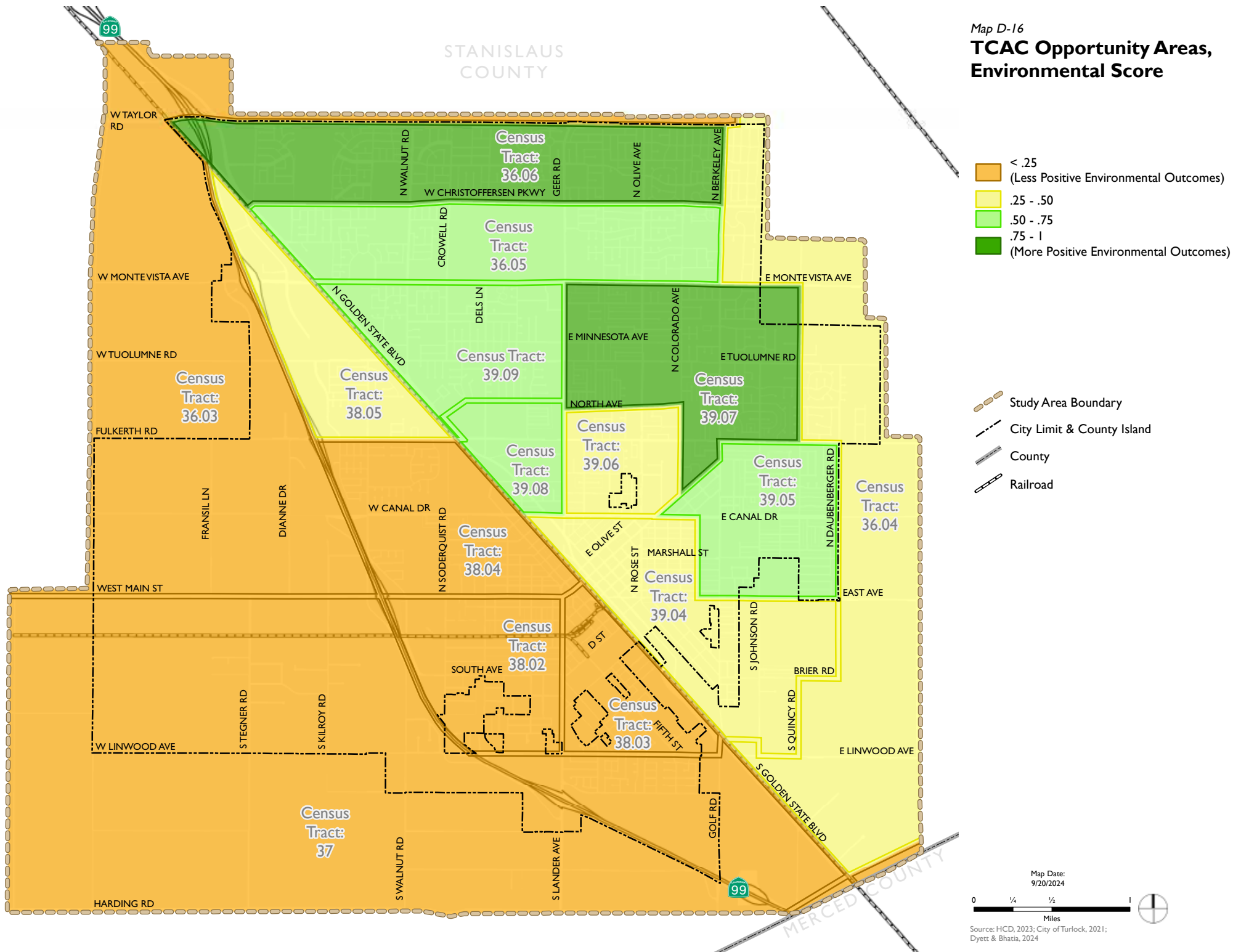
population both above and under the poverty line, the County scored higher than the County, indicating the City has a higher exposure to toxins than the County average.

This spatial pattern of environmental pollutant burden and lack of environmental amenities correlates with the areas of lowest resources and one area of highest segregation and poverty within Turlock. As disadvantaged communities exist within Turlock, the City of Turlock is required to adopt an environmental justice element.

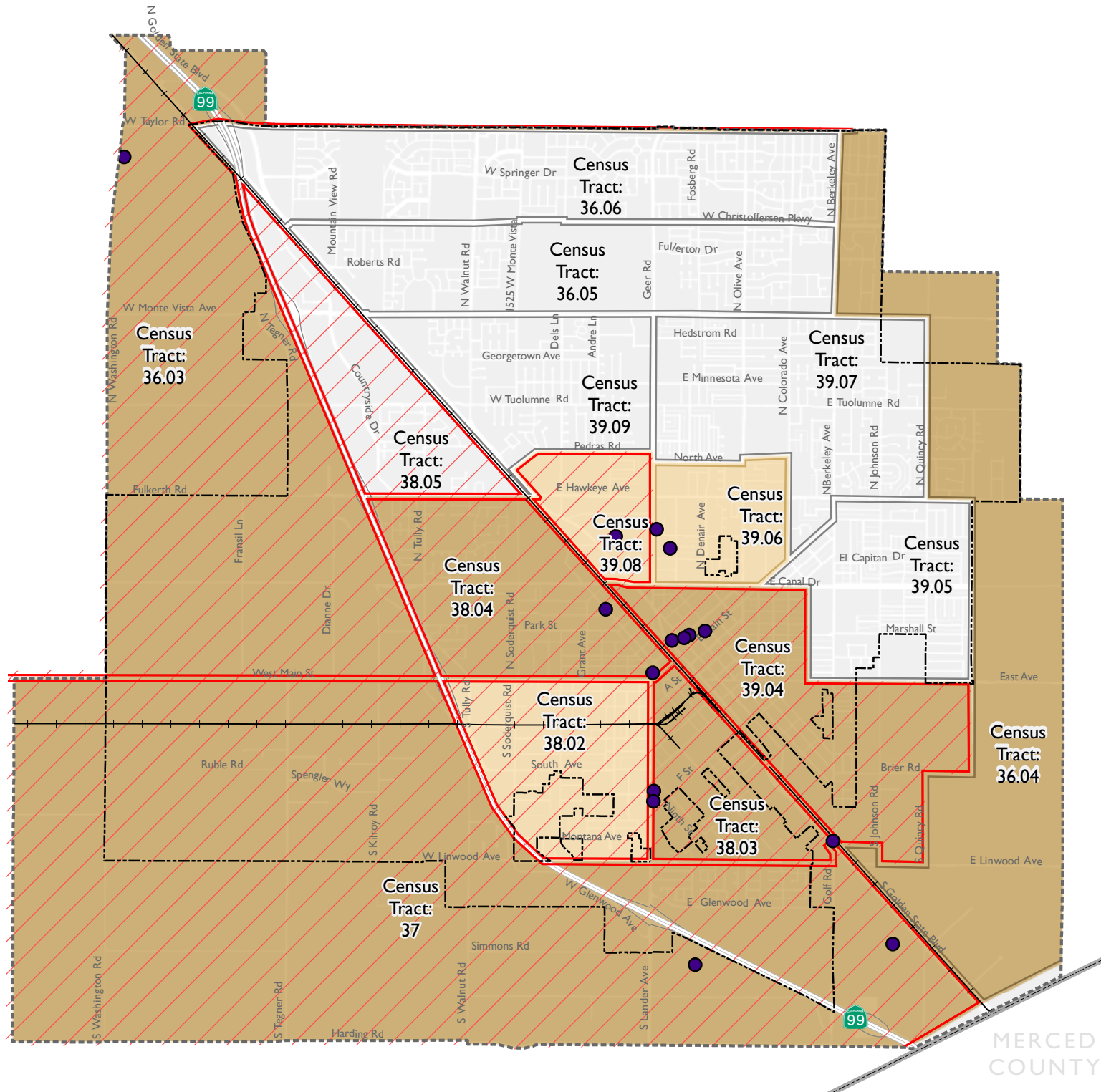
Map D-12 visualizes access to environmental opportunity in Turlock based on the TCAC indicators from CalEnviroScreen 4.0. Using TCAC these indicators, all of Turlock census tracts west of Golden State Boulevard are ranked as having the least positive outcomes. Tracts 36.03, 37.00, 38.02, 38.03, and 38.04 have the lowest potential for positive outcomes (less than 25 percent) and 38.05, which is closer to the more affluent areas in the northern part of the city, scores slightly higher (25 to 50 percent). Tracts with the more positive environmental outcomes are located in north and east Turlock, Tracts 36.06 and 39.07, which also align with Highest Resource areas and High White Segregation areas. The City's Pipeline Projects (see Table 3-2 in Chapter 3) are in Tracts 36.04, 36.05, 36.06, 38.02, 38.03, 38.04, and 39.04, which are predominantly in tracts scoring the lowest and higher potential for positive outcomes. Nearly all of the Pipeline Projects are for Moderate or Above Moderate Income units (370 and 906, respectively, out of 1,282 total units) and are located across all Resource levels and all levels of positive environmental outcomes. CalEnviroScreen 4.0 helps to identify communities disproportionately burdened by multiple pollution sources and with population characteristics making them more sensitive to pollution. Tract 38.02, the only High Segregation and Poverty Tract in Turlock, is in the overall 98th overall percentile for pollution burdens and vulnerabilities relative to the rest of the State. As DACs exist within Turlock, the City of Turlock is required by SB 1000 to adopt an environmental justice element. By developing an environmental justice element, the City can decrease pollution exposure, increase community assets and improve overall health by addressing unique or compounded health risks in disadvantaged communities.²⁸ A draft of the environmental justice element will be available in Spring of 2026. The City is already implementing and planning place-based community improvements to improve the quality of life in DACs and low-income neighborhoods – see Program 3-E in Chapter 4, Housing Action Plan. The City should investigate the potential for funding projects that could benefit lower-income residents in Tract 38.02 and other DACs.

²⁸ Office of Land Use and Climate Innovation. June 2020. General Plan Guidelines. Ch. 4.8: Environmental Justice Element. https://lci.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf

TCAC Opportunity Areas, Environmental Score

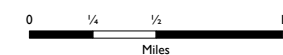


Threat of Groundwater Contamination



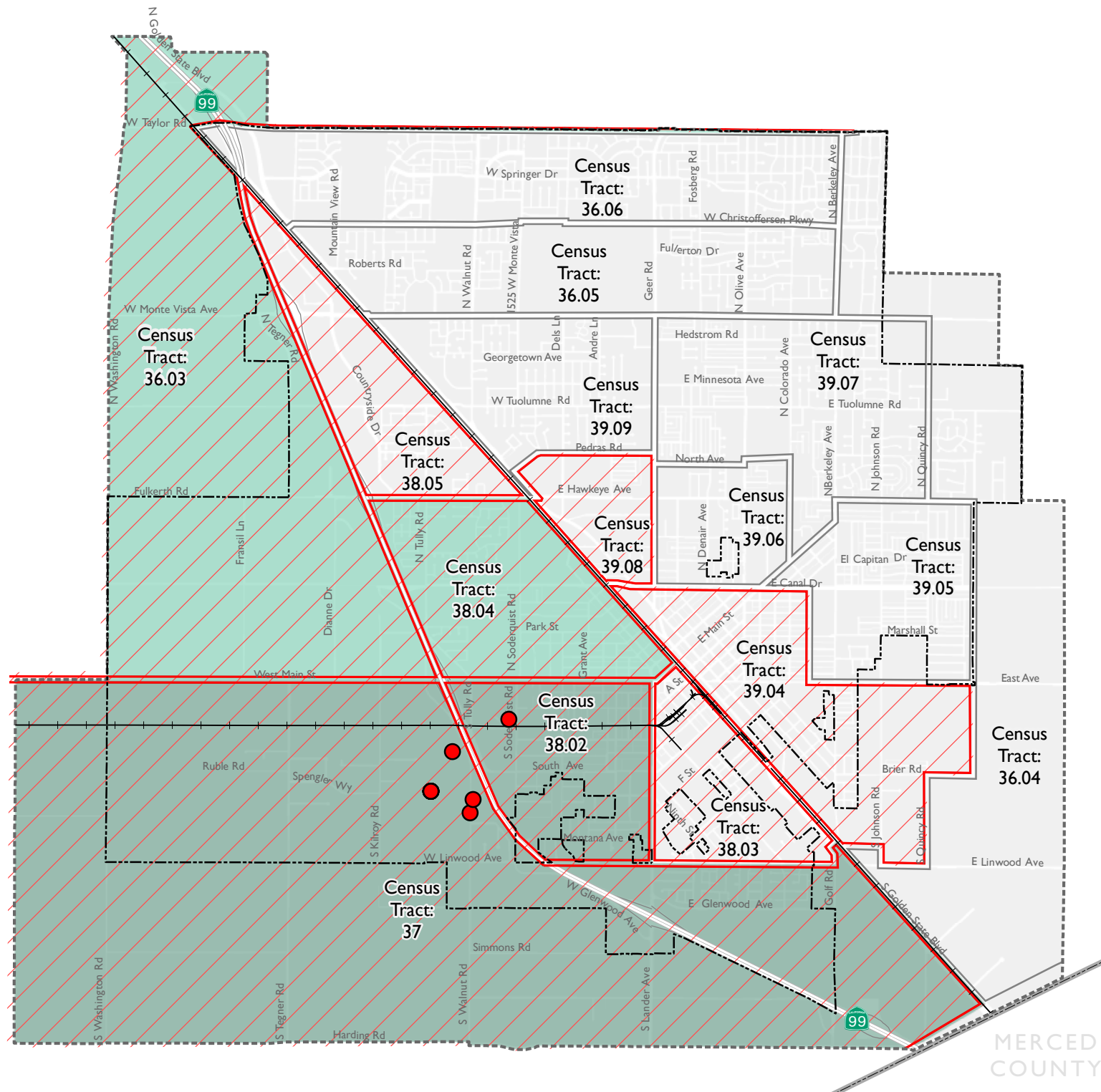
- SB 535 Disadvantaged Community
- Statewide Ranking by Census Tract**
- Groundwater Threat Percentile**
 - Top 25%
 - 50% - 75%
- Groundwater Threats Sites
- City Limit
- Study Area
- County Limit
- Freeway
- Railroad

Note: This map shows data from CalEnviroScreen, which uses 2010 Census Tract geographies; boundaries/labels shown may not align with other maps that use more recent geographies.

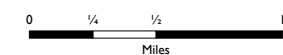




Concentration of Solid Waste Facilities



Note: This map shows data from CalEnviroScreen, which uses 2010 Census Tract geographies; boundaries/labels shown may not align with other maps that use more recent geographies.



Existing and Proposed Parks, Trails and Community Facilities



of the State. This can be caused by a variety of reasons, such as the area's proximity to industrial land uses and SR-99 freeway, the volume of truck traffic on local roads serving auto-service businesses, presence of hazardous materials sites, and lack of tree canopy coverage and parks.

Tract 38.02, the only High Segregation and Poverty Tract in Turlock, is in the overall 98th percentile for pollution burdens and vulnerabilities relative to the rest of the State. SB 535 (De Leon, 2012) directed that proceeds from the State's Cap and Trade Program be used for programs to reduce emissions of greenhouse gases with at least a quarter of the proceeds going to projects that provide a benefit to disadvantaged communities (DACs) and at least 10 percent of the funds be directed to projects located within those communities. Assembly Bill 1550 (Gomez, Chapter 369, Statutes of 2016) directed CalEPA to identify DACs and established the currently applicable minimum funding levels:

- At least 25 percent of funds must be allocated toward DACs;
- At least 5 percent must be allocated toward projects within low-income communities or benefiting low-income households; and

At least 5 percent must be allocated toward projects within and benefiting low-income communities, or low-income households, that are outside of a CalEPA-defined DAC but within ½ mile of a disadvantaged community.²⁹ The City should investigate the potential for funding projects that could benefit lower-income residents in Tract 38.02.

For the population above poverty level in the City, all races and ethnicities scored between 19 and 20 for the Environmental Health index (see Chart D-6) with Asian or Pacific Islander residents scoring the highest (20.9) and Hispanic residents the lowest, though not by much (19.4). Among those under the poverty level, a similar trend was inferred, Asian or Pacific Islander residents scoring the highest (19.8) and Hispanic residents the lowest, again, not by much (18.5). For both those above and under poverty, the County scored higher.

Transportation

Turlock is the northern terminus of Route 165 that connects the City to State Route 152 and Interstate 5 to the south. Travelling by bicycle and foot can be easy due to flat topography but the heat during the summer can limit this mode. In Stanislaus County, many people drive rather than use public transportation, but there are many alternative options available to those who chose not to drive or are not able to drive, such as seniors or those with mobility disabilities throughout the County.

Existing bus systems include the Stanislaus Regional Transit (StART) Authority, branded as the S, formed in 2021 from the merger of the Modesto Area Express (MAX) and Stanislaus Regional Transit (StanRT) systems which serves the County with eight 27 bus routes travelling throughout it; the Ceres Area Transit (CAT) which serves Ceres and its surrounding unincorporated area; Modesto Area Express (MAX) which offers bus service throughout the Modesto urban areas with 21 routes; and Turlock Transit which provides transit serve with seven routes within the community. Services include fixed route and dial-a-ride paratransit service to eligible individuals in Turlock. The program offers rides within a specified zone for

²⁹ CalEPA, California Climate Investments to Benefit Disadvantaged Communities

<https://calepa.ca.gov/envjustice/ghginvest/> and

<https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/>

those 65 years of age and over, Medicare card holders, elementary school students, and ADA paratransit eligible people.

Turlock is connected to StanRT through fixed-route bus service, most prominently Route 15, which links Turlock to Modesto via Keyes and Ceres, providing access to the broader countywide network. Within Turlock, Turlock Transit operates local fixed routes that serve neighborhoods, shopping areas, and CSU Stanislaus, with transfer points at the Turlock Transit Center. From there, riders can connect to StanRTA regional routes, as well as services from Merced's The Bus and other intercity providers, creating links throughout Stanislaus and neighboring counties. Other modes of public transit available to Turlock residents include regional rail service with connections to other public transit. Amtrak's San Joaquins regional line serves Turlock and Denair with six daily trains between Bakersfield to the south and Oakland and Sacramento to the north. The Turlock-Denair station is located on North Santa Fe Avenue close to the northeast corner of the city. The Altamont Commuter Express (ACE) currently provides service to Stanislaus County between Stockton and San Jose with stops in several Bay Area employment centers. At present, ACE doesn't provide direct service to Turlock but a new station on Golden State Boulevard has been funded by the State and is expected to open by 2029.³⁰ The project is being funded with a \$40 million grant that ACE Other services include Modesto Area Express (MAX), StaRT Commuter, and California Vanpool Authority (CalVans) all operate programs connecting Stanislaus County residents to transit but do not currently serve Turlock directly.

Turlock has taken proactive steps to improve access to walking and biking through its Active Transportation Plan, developed in partnership with StanCOG to enhance safety, boost non-motorized mobility, and support public health and equity. Local advocacy, including CSU Stanislaus students, helped secure over one million in federal Active Transportation Program grant funding for infrastructure improvements such as bike lanes, sidewalks, and crosswalk enhancements near schools and along key corridors. Community input, including from CSU Stanislaus students and local residents, was central to shaping these projects to make walking and biking safer and more accessible across the city. Transportation options, particularly those offered by Turlock Transit, are accessible and located throughout the city, as there are seven routes that traverse the city. Residents that live west of N Berkeley Avenue are limited in route options as the routes mostly are within the city center and south of Turlock. For the existing and proposed bicycle network improvements from the Active Transportation Plan, projects have been located evenly throughout residential areas of the city, as shown on Map D-21. DACs are generally well served, although new infrastructure is also planned. The greatest lack of bicycle infrastructure is actually in RCAAs in the eastern portion of the city. Completed segments include Geer Road where multi-family development is projected to accommodate lower income RHNA, as well as Christoffersen Parkway, which provides access from Downtown to CSU Stanislaus.

³⁰ *Turlock Journal*, December 7, 2021 <https://www.turlockjournal.com/news/government/ace-train-could-be-running-turlock-2025/>; *Railway Track and Structures (RT&S)*, December 29, 2023 <https://www.rtands.com/passenger/stanislaus-county-receives-13-million-for-ace-expansion/>

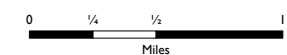
Map D-21

Existing and Proposed Bicycle Network from Turlock's Active Transportation Plan

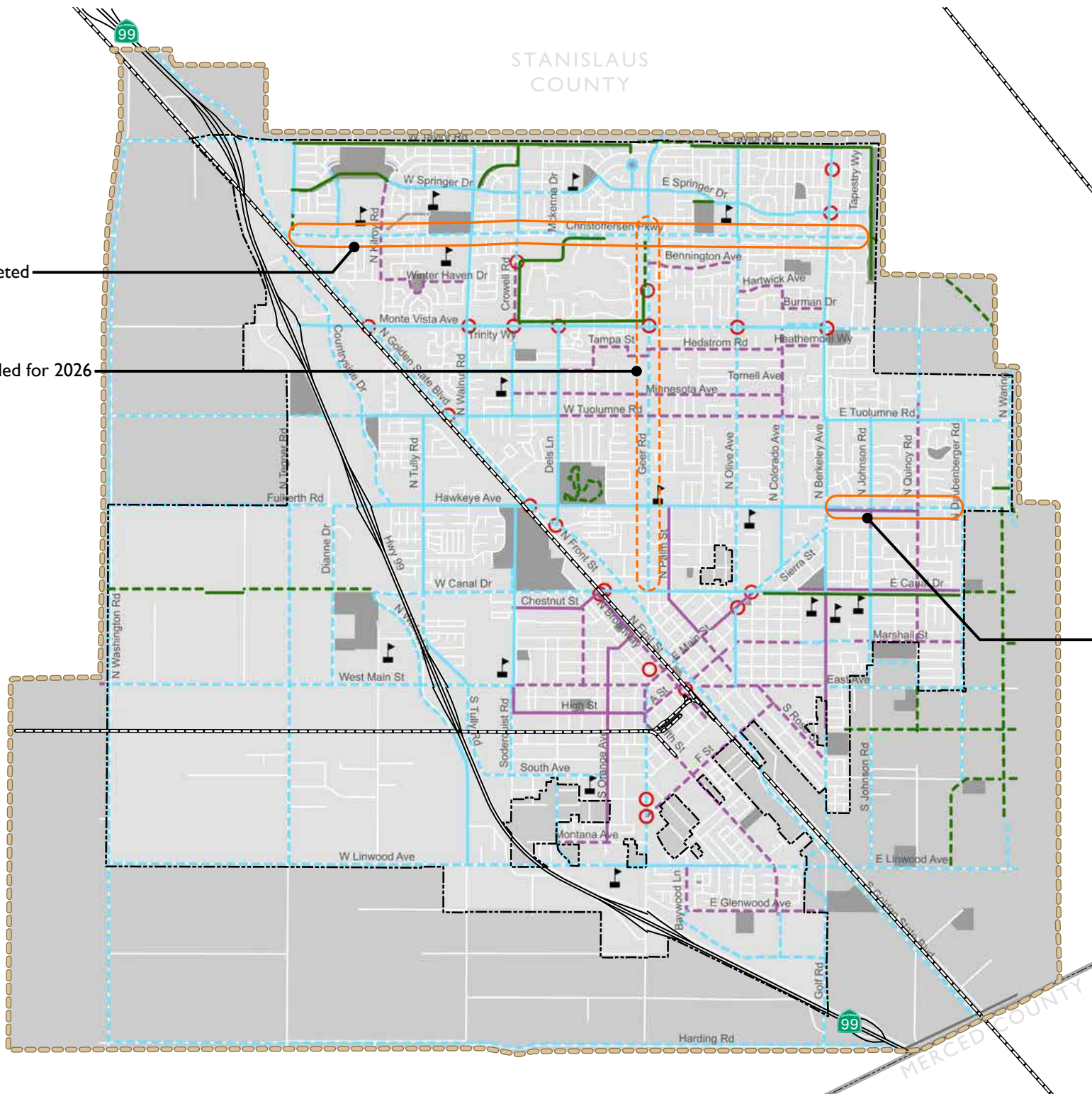
- Class I Shared-use Path (existing)
- Class I Shared-use Path (proposed)
- Class II Bike Lane (existing)
- Class II Bike Lane (proposed)
- Class III Bike Route (existing)
- Class III Bike Route (proposed)
- Parks
- Schools
- Intersection Improvements

- Study Area Boundary
- City Limit & County
- County
- Railroad

Completed



Source: City of Turlock Active Transportation Plan, 2015. Figure 6-3: Long Term Bicycle Network Vision; Dyett & Bhatia, 2025



STANISLAUS COUNTY

99

MERCED COUNTY

Completed

Scheduled for 2026

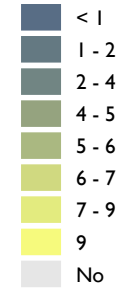
In the area south of South Golden State Boulevard, particularly near Golf Road, Paulson Road, and South First Street, the county is actively investing in improvements. This includes adding new traffic signals, upgrading intersections with widened lanes, and installing medians to improve safety and traffic flow. The transit hub project at Del's Lane and Golden State Boulevard also includes a traffic signal, lighting, and a bike rack, reflecting efforts to better support pedestrians, cyclists, and transit riders. Closer to Colombia Park, much of the southern part of Turlock generally has had older pavement. Projects like the Golden State Boulevard rehabilitation (Main Street to 20th Century Boulevard) have been completed, including new sidewalks, curbs, gutters, and striping, so conditions are improving across that corridor. On the other hand, north of West Christoffersen Parkway, particularly around the CSU Stanislaus area, has benefitted from proactive enhancements. The city's Active Transportation Plan calls for buffered bike lanes along Christoffersen Parkway, green pavement at key intersections, and better connectivity toward Tegner Road to facilitate safe cycling.

HUD's Location Affordability Index uses data from the American Community Survey to evaluate transportation cost relative to housing costs. Index values range from zero to 100 and are reported by race. In the County, the low transportation cost index is higher across all races/ethnicities in Turlock than in the County for those below and above poverty. This indicates transit allows low-income single parent households to afford transportation. Transit index scores across all races/ethnicities were higher in the County than Turlock likely because across the County (and heavily influenced by Modesto), there are more people with lower incomes taking transit than in Turlock. Overall, transit is affordable and used by people who need it in Turlock.

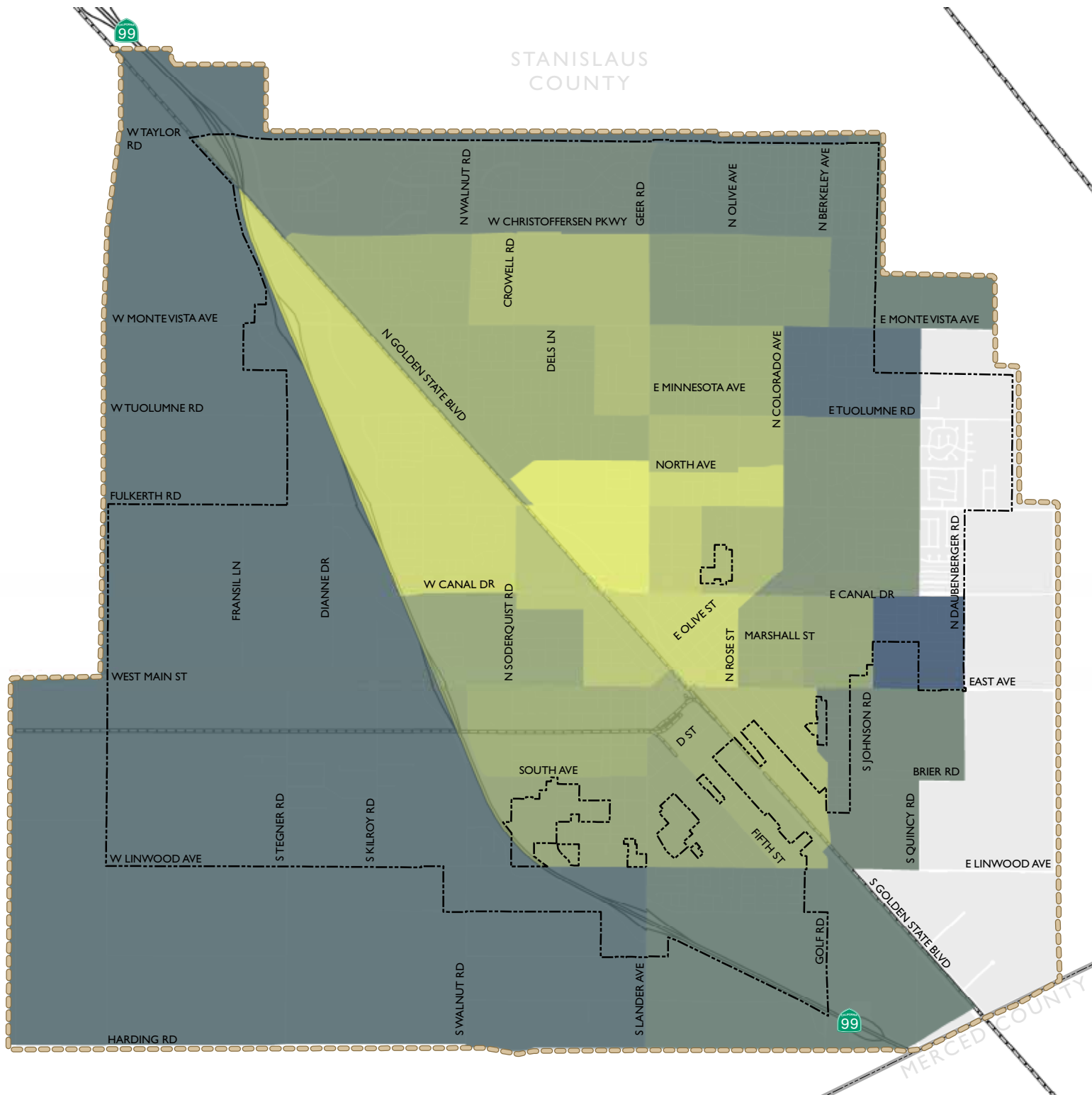
Another tool for comparing transit access is the Center for Neighborhood Technology's Housing and Transportation Affordability Index, which provides a basis for measuring housing affordability by factoring in the cost of transportation. Turlock, Modesto, and Stanislaus County all rank about the same with housing accounting for 29 percent of expenses in both Turlock and the County and 28 percent in Modesto. Turlock and Stanislaus County score 4.3 for Job Access compared with 5.2 for Modesto, as shown on Map [D-2243](#). Within the city of Turlock, areas with the highest combined cost of housing and transportation are located farthest from the center of the city suggesting that neighborhoods closer to the Downtown are more location efficient and affordable. Most of the tracts between West Christoffersen Parkway and Linwood Avenue and east of Highway 99, including the CSUS campus and the five census tracts where 20 to 40 percent of the population live below the poverty line (displayed on Map [D-86](#) above) and have combined costs that comprise less than 50 percent of household expenses.

Turlock Transit Performance Score

Overall transit score that looks at connectivity, access to jobs,



- Study Area Boundary
- City Limit & County Island
- County
- Railroad



D.5 Disproportionate Housing Needs & Displacement Risk

Disproportionate housing need refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. This analysis evaluates disproportionate housing need in Turlock by assessing cost burden, overcrowding, and displacement risk within Turlock and compared to Stanislaus County and the Modesto region when applicable.

COST BURDEN

Cost burden, or overpayment, is defined as monthly shelter costs exceeding 30 percent of household income. Severe cost burden is defined as paying over 50 percent of household income for shelter costs. Shelter cost is defined as the monthly owner costs (mortgages, deed of trust, contracts to purchase or similar debts on the property and taxes, insurance on the property, and utilities) or the gross rent (contract rent plus the estimated monthly cost of utilities). The Stanislaus Urban County & City of Turlock Consortium Consolidated Plan (FY 2020-2025) provides the most recent estimates of cost burden by tenure and income category.³¹ Estimates use the HUD Area Median Family Income (HAMFI) to determine overpayment. HAMFI is the median family income calculated by HUD for each jurisdiction to determine Fair Market Rents (FMRs) and income limits for HUD programs. HAMFI is not necessarily equivalent to other median income calculations due to a series of adjustments made by HUD.

The Consolidated Plan uses data from the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS), which estimates that 5,295 households in Turlock (21.0 percent) were cost burdened and an additional 4,465 households experienced severe cost burden (17.7 percent). This means that just under half of all Turlock households experience some level of cost burden. Of the 9,760 households experiencing some level of cost burden, 1,800 of them are considered moderate- or above-moderate-income and 7,960 are considered lower-income. Even though some higher-income households may be classified as “cost burdened,” it is clear that housing affordability is particularly pressing for lower-income households in Turlock. CHAS data from 2019 indicated that among severely cost-burdened households, the three most common household types in Turlock were small family (two- to four- person households) elderly non-family (unrelated individuals over the age of 62) , and other (could include unrelated individuals living together, or people living alone, who are under the age of 62). According to the Turlock/Stanislaus HOME-ARP Allocation plan, housing costs have been increasing for years, but recent events, including the COVID-19 pandemic and the end of the eviction moratorium, have exacerbated housing cost burden and housing instability for many lower-income households in Turlock.³²

Available data show that cost burden for renters and owners in Turlock is more evenly distributed by race and ethnicity than by location. (See Maps [D-14-23](#) and [D-15-24](#) and Charts D-8 and D-9) Not surprisingly, there is a relatively high correlation between cost burden and income. Renters in Turlock are more likely to

³¹ Stanislaus Urban County & City of Turlock Consolidated Plan Fiscal Year 2020-2025
<https://www.stancounty.com/planning/cdbg/documents/consolidated/2020-2025-consolidated-plan-final.pdf>

³² Turlock/Stanislaus County HOME Consortium, 2023. HOME-ARP Allocation Plan. Available: <https://ci.turlock.ca.us/pdf/hppr.asp?id=36>

be cost burdened than owners--50.3 percent of all renters experience some level of cost burden while only 28.8 percent of owners do, due to the sharp increases in rent the past couple of years. Elsewhere in the County, the AFFH data viewer shows Modesto also has concentrations of cost burdened renters and homeowners and more renters are cost burdened than homeowners throughout the County, and especially in Modesto. Notably between 60 and 80 percent of homeowners in the tract immediately west of Turlock are cost burdened.

White and Hispanic/Latino homeowners have similar rates of cost burden, Black homeowners have a higher level, and Asian households are less burdened. (The data for cost-burdened Asian Pacific Islander (API) households, who represent a very small percentage of the population, is statistically insignificant.) The census tract with the highest rate of burdened homeowners (Tract 38.02) is one of two tracts in Turlock where 30 to 40 percent of the population had reported incomes below the poverty line in 2019. Tract 38.02 is also the only one in Turlock that meets the threshold for High Segregation and Poverty and the highest level of overcrowding in the community. (See Maps [D-118](#) and [D-2546](#))

Despite rising housing costs, much of Stanislaus County remains relatively affordable and may be less prone to the cost burden pressures faced in the Bay Area region. Although housing costs are low relative to the Bay Area, the region has still seen an increase in the cost of housing. Home values in Turlock have increased by 124 percent since 2011, with the value of smaller units (1 and 2-bedrooms) seeing the steepest increase. From 2014 to 2024, 1-bedroom homes increased in value by 215.8 percent during the period, from \$89,689 to \$283,246, while 2-bedroom homes increased in value by 159.51 percent during the period, from \$137,119 to \$355,830. This indicates a mismatch of supply and demand. At \$428,929, the average home value in Turlock was well beyond reach for Moderate- and Lower-Income Households in 2021. Also, rents in Turlock and the county were generally stable between the 2012 and 2017 period, increasing by about 4 percent and 4.8 percent. However, between 2017 and 2022 rents spiked in Turlock—increasing by about 40.2 percent—while the county experienced a slightly lower rent increase at approximately 38 percent. This substantial rent increase over between 2017 and 2022 echoes cost of living increases that have occurred across California. While rents have risen in the past couple of years, rents have generally stayed the same throughout neighborhoods in Turlock.

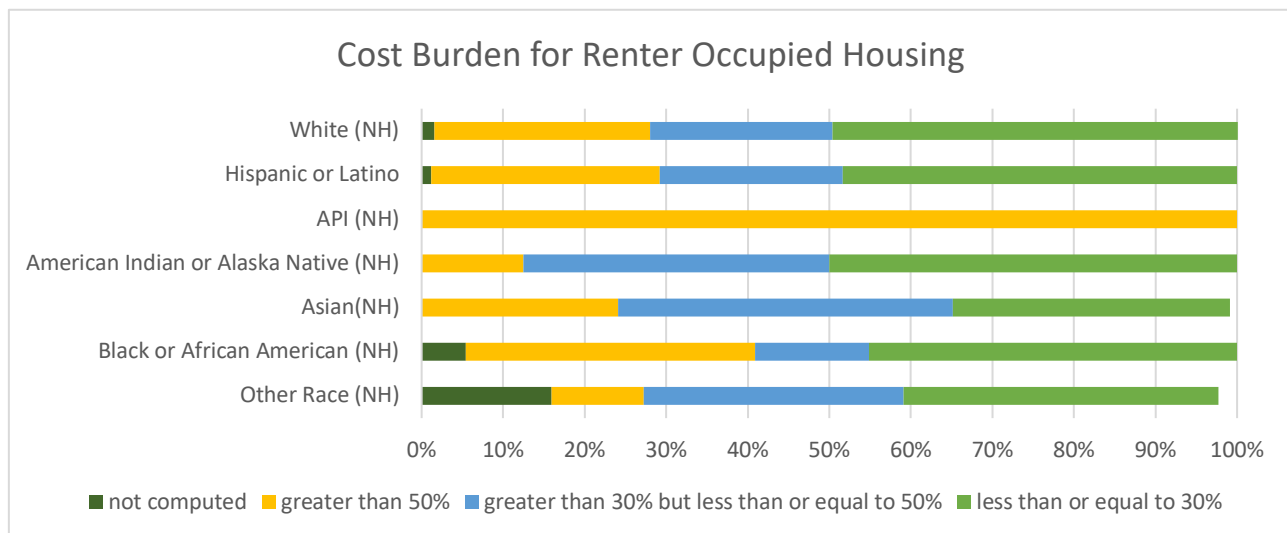
In terms of foreclosures, City staff consulted a local broker to get a sense of pattern between neighborhoods. In the past 12 months, there were a total of 20 properties in Turlock that had a Notice of Default or Notice of Trustee Sale recorded, where 15 were in the zip code 95380 and 5 were in the zip code 95382. When calculating cases per acres, the 95380 zip code has about 0.22 case per 100 acres, while the 95382 zip code has 0.122 case per 100 acres.

OVERCROWDING

The U.S. Census deems housing overcrowded when there are more than 1.01 persons per room (excluding bathrooms and kitchens) in an occupied housing unit and severely overcrowded when there are more than 1.5 persons per room. The Census reported that 1,317 out of 25,444 occupied housing units in Turlock were either overcrowded or severely overcrowded (5.2 percent), which is lower than the rate in Stanislaus County (7.1 percent) and slightly less than Modesto where 5.9 percent of all households were overcrowded.

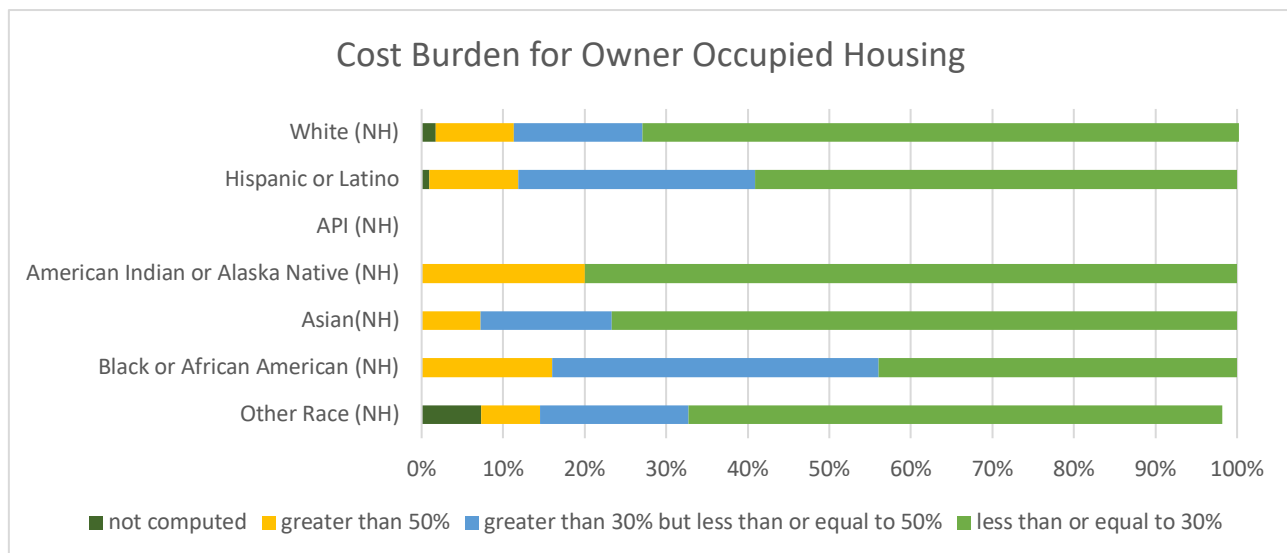
In both Turlock and the County, renters are more likely to live in crowded housing. In Turlock, 0.6 percent of owners live in severely overcrowded housing and 2.7 percent of owners live in crowded housing, while 2.4 percent of renters live in severely crowded housing and 5.8 percent of renters live in overcrowded housing. In the County, 1.1 percent of owners live in severely overcrowded housing and 3.4 percent of owners live in overcrowded housing, while 2.3 percent of renters live in severely overcrowded housing and 7.9 percent of renters live in overcrowded housing.

Overall, the rate of overcrowding in Turlock is lower than Stanislaus County and the state. In Turlock as shown in Map D-25+6, there is one tract that experiences higher rates of overcrowding, Tract 38.02, which coincides with the City's only High Segregation and Poverty tract, where 214 households or 10.4 percent of households are overcrowded. The rest of the city experiences less than 10 percent of overcrowding. Although they represent a very small share of the total population, Native Hawaiians and Other Pacific Islanders are nearly three times more likely to experience overcrowding than other races and ethnicities in Turlock. Overcrowding can result when there are not enough adequately sized units within a community, or when high housing costs relative to income force too many individuals or families to share housing. Overcrowding particularly affects lower-income households and can typically occur when there is an inadequate supply of affordable housing.



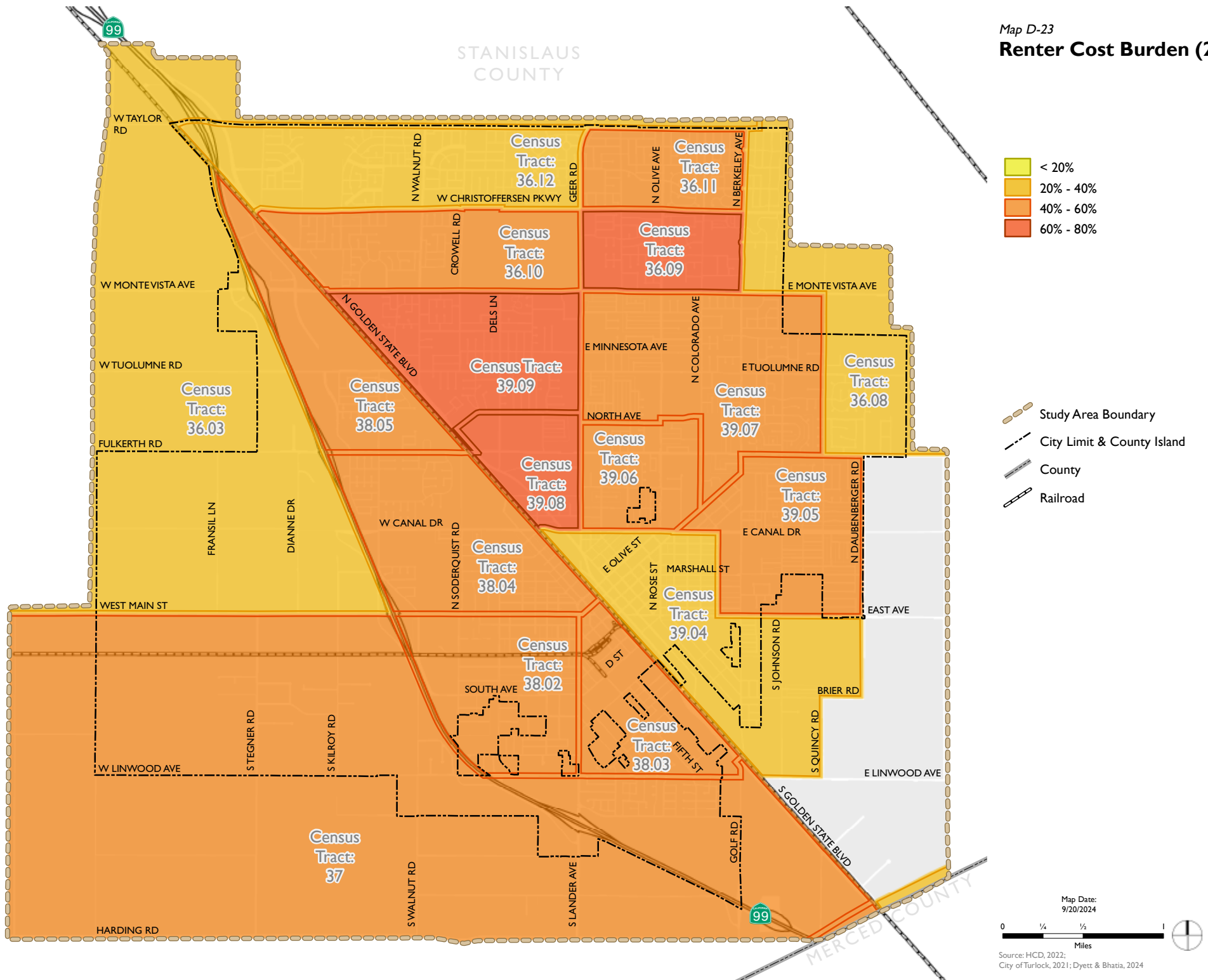
Source: HCD AFFH Data and Mapping Resources (2019 ACS 5-year estimates)

Chart D-9: Cost Burden for Owner Occupied Housing by Race/Ethnicity in Turlock

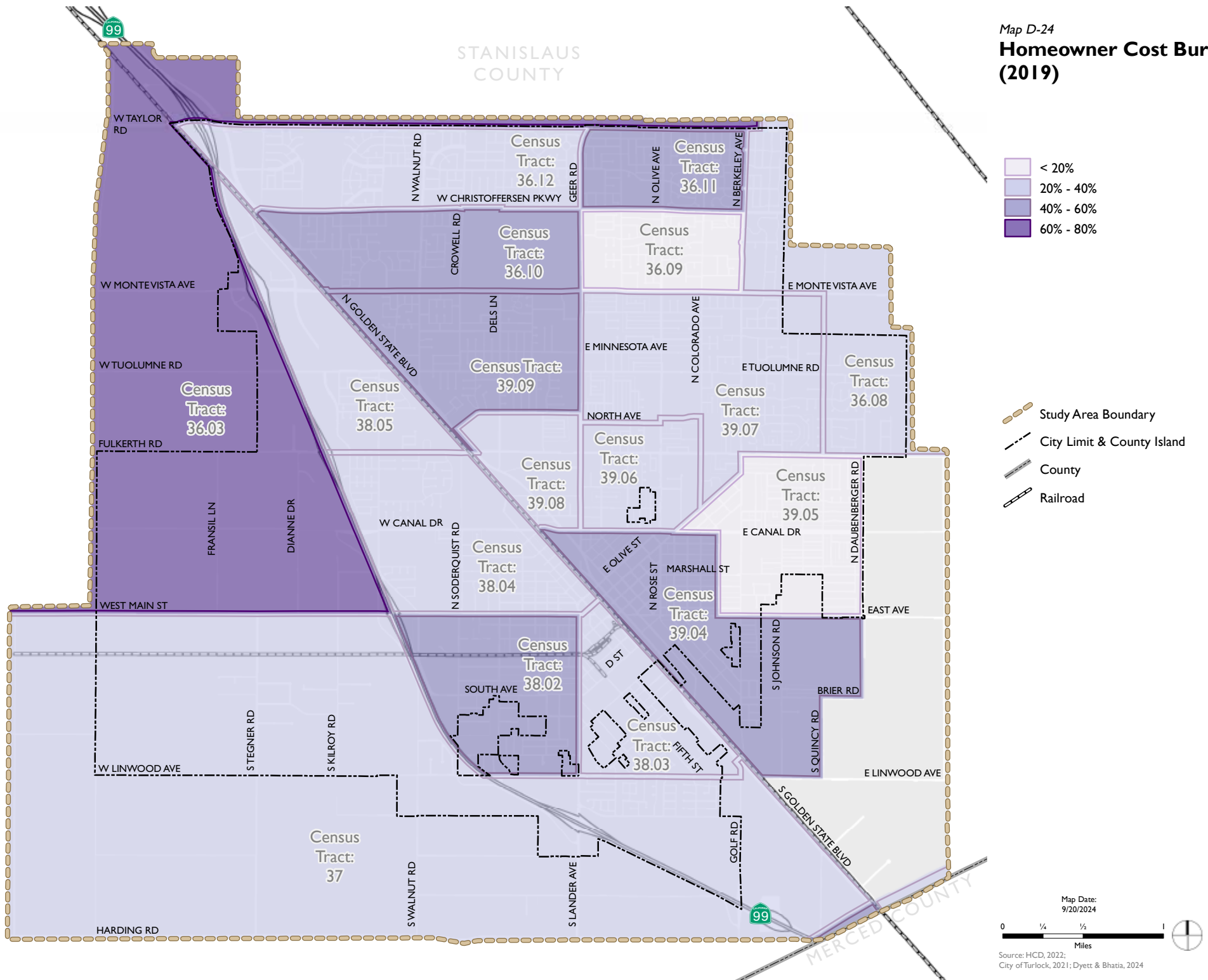


Source: HCD AFFH Data and Mapping Resources (2019 ACS 5-year estimates)

Renter Cost Burden (2019)



Homeowner Cost Burden (2019)



DISPLACEMENT RISK

Lower-income people of color displaced from other sectors of the Bay Area, like San Francisco and Oakland, are increasingly moving to the Central Valley. Despite rising housing costs, much of Stanislaus County remains relatively affordable and may be less prone to the displacement pressures faced in the Bay Area region. Although housing costs are low relative to the Bay Area, the region has still seen an increase in the cost of housing. Home values in Turlock have increased by 124 percent since 2011, with the value of smaller units (1 and 2-bedrooms) seeing the steepest increase. From 2014 to 2024, 1-bedroom homes increased in value by 215.8 percent during the period, from \$89,689 to \$283,246, while 2-bedroom homes increased in value by 159.51 percent during the period, from \$137,119 to \$355,830. This indicates a mismatch of supply and demand. At \$428,929, the average home value in Turlock was well beyond reach for Moderate- and Lower-Income Households in 2021. As housing costs increase, this gap may expand and subject lower-income households to displacement pressures that have otherwise been absent or relatively low in the city. Communities of color may be particularly impacted by this dynamic because they are disproportionately low-income. Beyond the broader housing and economic factors in Turlock and the surrounding Stanislaus County like the housing affordability crisis, cost burden, and regional growth, there are no local events that have specifically led to displacement.

Further, the condition of the housing stock, including the age of buildings and units that may be in substandard condition, is also an important consideration in a community's housing needs. In Turlock, about 16 percent of the housing stock was constructed prior to 1960 and is over 65 years old. Just under 50 percent of the housing stock was constructed prior to 1980 and is over 40 years old. About 24 percent of the housing stock has been constructed since 2000, with only 4.4 percent constructed since 2010. Also, Maps B-1 and B-2 in Appendix B: Housing Needs Assessment display substandard housing conditions for owner and renter occupied households by tract. Owner-occupied households with most substandard housing issues are concentrated in Tract 39.04, which encompasses Downtown, historically the oldest neighborhood in Turlock, and some parts of Stanislaus County, while renter-occupied households with highest percent of substandard housing conditions are located in northern Turlock in Tract 36.10 west of Geer Road and south of Downtown east of Golden State Boulevard, and within the area home to California State University, Stanislaus. Renter occupied households that also face higher percentages of substandard housing include Tract 39.06 and Tract 38.03, which feature County islands, areas of unincorporated county land that are surrounded by incorporated Turlock on all sides. Overall, substandard conditions in Turlock are not overly concentrated in any single area or particularly high as a percentage of existing housing even in the tracts with the highest share.

Displacement due to environmental hazards is virtually nonexistent in the City. As discussed in Appendix C's Constraints Analysis, the City is not located near active faults, and its flat terrain precludes the danger of landslides. Turlock's topography and nature of urban and agricultural development make wildfire risk low. Turlock Fire Department's Fire Prevention Bureau provides fire safety inspections, information on planned escape from a building, and safe barbecue practices but does not focus on wildfire.³³ Stanislaus County's Safety Element mentions defensible space in development standards, but information on defensible space inspections is lacking.³⁴ The Turlock Irrigation District does create Wildfire Mitigation Plans, but acknowledges that much of its service area is not a high fire threat area, and where it has

³³ Turlock Fire Department. <https://www.cityofturlock.org/firedepartment/safetyfirepreparedness/>

³⁴ Stanislaus County. 2016. Safety Element. <https://www.stancounty.com/planning/pl/gp/current/gp-chapter5.pdf>

previously activated fire response is outside of Turlock's Sphere of Influence (SOI).³⁵ Additionally, the SOI is not located in or near Federal Emergency Management Agency (FEMA) flood maps for 100- or 500-year floods.³⁶ However, localized flooding that spills over into curbs and sidewalks can occur during storms throughout the City due to the flat terrain and imperviousness in urban areas.³⁷ The storm drain system can handle flooding, but the City also provides sandbag pickup.^{38,39} The Turlock Annex of the Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan highlights dam incidents as a priority hazard due to their catastrophic magnitude, although they are deemed unlikely.⁴⁰ More information on dam incidents and environmental hazards can be found in Appendix C.

The University of California Urban Displacement Project (UDP) has used housing and demographic data from the US Census and real estate market data from Zillow to classify census tracts according to "displacement" typologies. The California Estimated Displacement Model (EDR) identifies varying levels of displacement risk for low-income renter households in all census tracts in California. Displacement risk means that in 2019 a census tract had characteristics which, according to the model, are strongly correlated with more low-income renter population loss than gain. In other words, the model estimates that more low-income households left these neighborhoods than moved in. Because the model uses 2015-2019 data, the correlations between tract characteristics and low-income renter population loss are only based on this period. Tracts are assigned to one of the following categories:

- Low Data Quality: the tract has less than 500 total households or the census margins of error were greater than 15% of the estimate (shaded gray).
- Lower Displacement Risk: the model estimates that the loss of low-income households is less than the gain in low-income households. However, some of these areas may have small pockets of displacement within their boundaries.
- At Risk of Displacement: the model estimates there is potential displacement or risk of displacement of the given population in these tracts.
- Elevated Displacement: the model estimates there is a small amount of displacement (e.g., 10%) of the given population.
- High Displacement: the model estimates there is a relatively high amount of displacement (e.g., 20%) of the given population.
- Extreme Displacement: the model estimates there is an extreme level of displacement (e.g., greater than 20%) of the given population.

³⁵ Turlock Irrigation District. 2023 Wildfire Mitigation Plan. <https://www.tid.org/wp-content/uploads/2023/12/Turlock-Irrigation-District-2023-Wildfire-Mitigation-Plan.pdf>

³⁶ California Department of Water Resources. Best Available Map. <https://gis.bam.water.ca.gov/bam/>

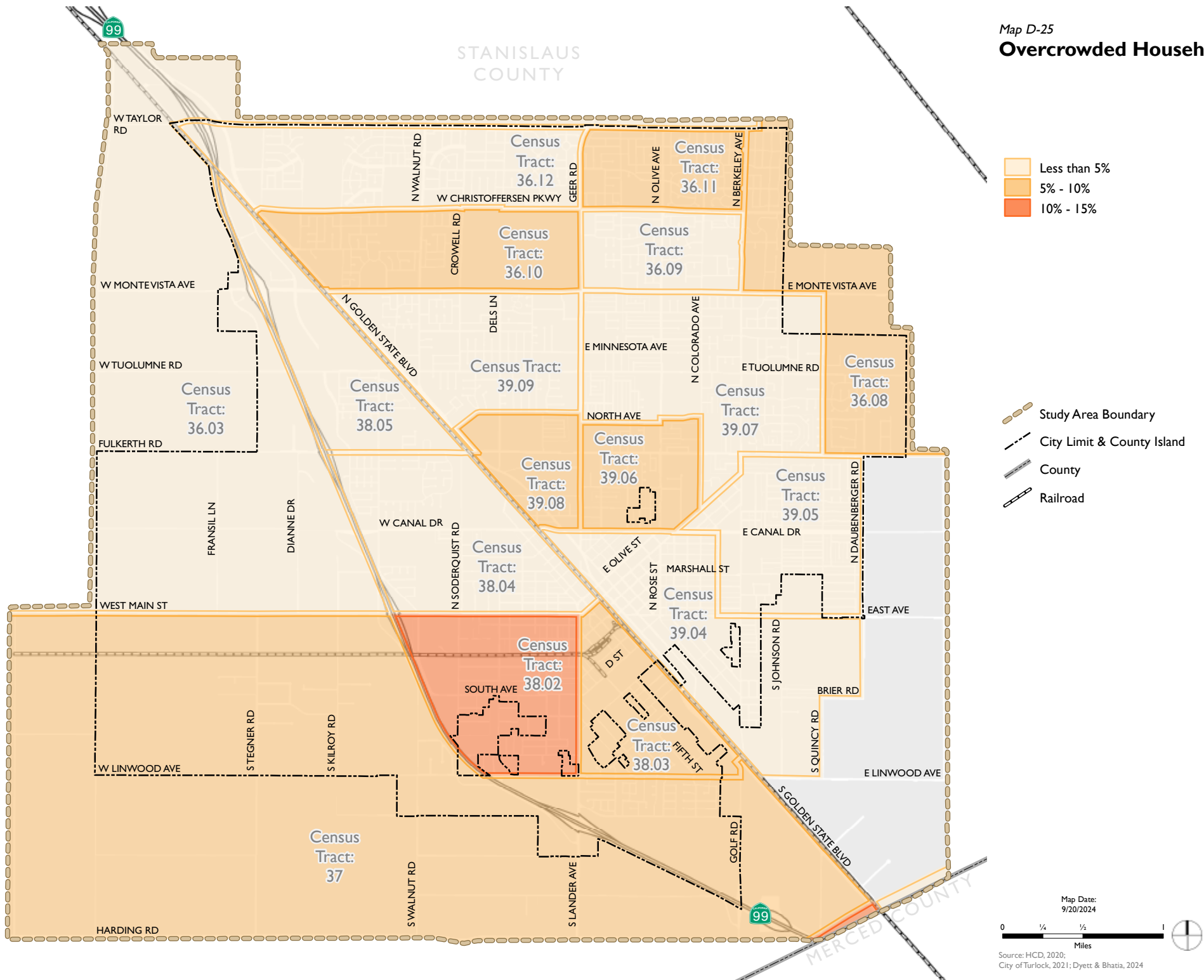
³⁷ Alyssa Aredas. January 5th, 2017. "Turlock braces for flooding as weekend storm approaches." *Turlock Journal*. <https://www.turlockjournal.com/news/local/turlock-braces-for-flooding-as-weekend-storm-approaches/>

³⁸ City of Turlock. October 2013. Storm Water Master Plan. https://www.cityofturlock.org/pdf/files/StormWater_MasterPlan.pdf

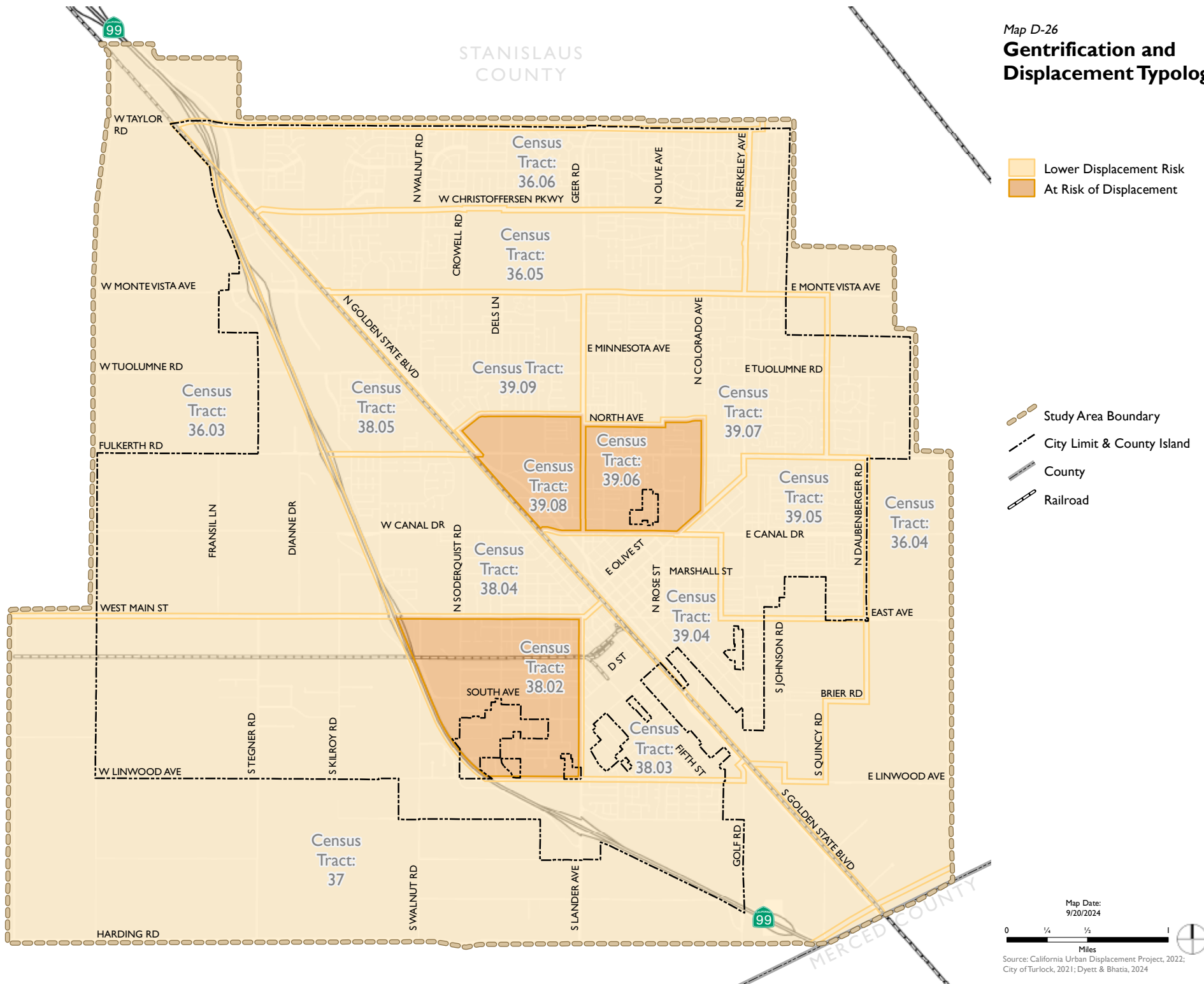
³⁹ City of Turlock. Flooding. <https://www.cityofturlock.org/neighborhoodissues/waterissues/flooding.asp>

⁴⁰ 2022-2027 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan. Annex H: City of Turlock. <https://oes.stancounty.gov/home/showpublisheddocument/262/638809159028500000>

Overcrowded Households



Gentrification and Displacement Typologies



Based on the data, all of Turlock is considered to have some potential for displacement but three tracts in the central part of the city (Tracts 38.02, 39.06, and 39.08 are classified as “at risk” for displacement. All three tracts were among the five that had the highest percentage of residents with income below the poverty line in Turlock. One tract, Tract 38.02, identified as at risk of displacement is also identified as High Segregation and Poverty, while another tract, Tract 39.06, was identified as most percentage of overcrowded households, and most low to moderate income population. A similar pattern emerged in Modesto where three tracts in the center and southern portion of Turlock were identified as “Probable Displacement” by UDP, 2022 (see Map [D-4726](#)). Much of the protection for displacement in Turlock comes from state law. All multifamily units in Turlock are protected by the State’s Tenant Protections Act of 2019 (AB 1482), which includes an annual rent cap and just-cause protections. The City does not have any additional local rent stabilization or just-cause eviction policies in place. Turlock has granted up to \$1,000 to households impacted by temporary or permanent relocation from public funds, as noted in the City of Turlock Housing Element 2015-2023. Funding beyond \$1,000 is disbursed as a low-interest loan. Specifically, this was applied to an instance when four families who were living in a four-plex on Lambert Way were affected by renovation work on the property. The amount of the grant is tied to the HUD requirements in the Uniform Relocation Act.

HOMELESSNESS

Preliminary numbers from the 2025⁴¹ homeless count tallied 2,052-086 persons countywide including 201-241 in Turlock and 1,622-603 in Modesto.⁴¹ The number of people experiencing homelessness in Turlock has increased slightly from 9.8 percent in 2024 to 11.55 percent in 2025; however, the share of people experiencing homelessness in Turlock has stayed relatively the same the past four years, though overall Stanislaus County PIT Count has increased. decreased 13.7 percent from 2023, which is significantly less than the 1.2 percent drop in Modesto and the 1.9 percent decline in the county total. The Turlock homeless PIT count in 2025⁴² tallied was 233-241 individuals (11.55 percent), which was almost the same as the number share counted in 2020 (232)-3 (233 individuals, 11.14 percent).⁴² decreased 13.7 percent from 2023, which is significantly less than the 1.2 percent drop in Modesto and the 1.9 percent decline in the county total. The Turlock homeless count in 2023 was 233, which was almost the same as the number counted in 2020 (232) but an increase of 22 from 2022. The preliminary 2024 count for Turlock was 9.7 percent of the total homeless in Stanislaus County, a decline from 11.1 percent of the total number of homeless persons in Stanislaus County in 2023.⁴³ It is important to note volunteers for PIT count were more engaged than other years, which may have lead to higher counts.

The results from the counts have ranged from a low of 1,857 in 2022 to a high of 2,957. Even though there has been some success in providing housing, according to the Stanislaus Community System of Care, which conducts the annual counts, the variation could also be affected by factors such as the number of volunteers participating and how well the count is organized. It should also be noted that the count includes those staying in emergency shelters, government-paid motel rooms, and transitional housing as well as those sleeping in cars, recreational vehicles, and tent encampments but does not account for people who are temporarily staying with friends or family or who are paying for their own motel rooms. There are currently

⁴¹ Executive Summary, 2025 Stanislaus County Homeless Point-in-Time Count, <https://csocstan.com/wp-content/uploads/2025/06/2025-Final-PIT-Report-English-.pdf>

⁴² Executive Summary, 2023 Stanislaus County Homeless Point-in-Time Count, <https://www.stancounty.com/newsfeed/pdf/executive-summary-english.pdf>

⁴³ Stanislaus County, 2023 Stanislaus County Homeless Point in Time Count, Executive Summary. Available: <https://www.stancounty.com/newsfeed/pdf/executive-summary-english.pdf>

~~two homeless or transitional shelters in Turlock including the Children's Crisis Center and the Turlock Gospel Mission Shelter.~~

People of color are disproportionately represented among those who were counted. In 2023, Black and American Indian or Alaska Native account for 10.8 percent and 6.1 percent of homeless Stanislaus residents respectively but represent only 2.7 and 4.0 percent of the overall population. Most of the homeless population in Turlock and in the Stanislaus County Planning Area continues to be comprised of White and Hispanic persons—71 percent White and 37 percent Hispanic in the county in 2023.

State law (SB 2 (Cedillo)) requires all jurisdictions to have at least one zone (where residential uses are allowed) in which at least one year-round emergency shelter is permitted by right. Zoning codes must also allow low-barrier navigation centers (LBNCs). To meet the requirements of this legislation, Chapter 4 Housing Action Plan includes programs that will bring the City into compliance with SB 2 by amending its zoning ordinance to allow LBNCs as a by-right use in all zones where mixed-use development is permitted and in all nonresidential zones where multifamily uses are permitted (Program 2-1). The Housing Action Plan will also amend the zoning ordinance to define single-room occupancy (SRO) units as a residential use and allow SRO development in new and renovated mixed-use buildings.

~~or entering into a multi-jurisdictional agreement to provide a homeless shelter. Because Modesto is the largest city in Stanislaus County and the county seat, it offers the widest range of emergency shelters and transitional housing in the county including 13 facilities with 896 beds. There are currently two homeless or transitional shelters in Turlock including Turlock Gospel Mission, who operate an 80-bed shelter in Turlock, and We Care Program, a 49-bed shelter that serves chronically homeless men over the age of 18. Turlock has four emergency shelters—the Gospel Mission serves men, women, and children; We Care temporary shelter for homeless men; Haven Women's Shelter; and the Children's Crisis Center.~~ The City maintains a web page called Homelessness in Turlock <https://www.turlock.ca.us/government/homelessnessinturlock/> that includes links to videos of meetings the City held to receive feedback on homelessness, a resource guide, and a list of service providers in the Turlock area including addresses, hours of operation and links to provider websites.⁴⁴

Several programs serving people experiencing homelessness were supported in recent years through the City's Public Services grants utilizing Community Development Block Grant (CDBG) funding, including:

- The United Samaritans Foundation's Emergency Food Box assisted 331 low-to moderate-income individuals and homeless families by providing monthly food support, and its Senior Congregate Lunch Program served 33 elderly residents with nutritious meals and social engagement opportunities.
- Healthy Alternatives to Violent Environment (HAVEN) aided 11 domestic violence survivors with housing-related support.
- Project Sentinel provided housing counseling and tenant-landlord dispute resolution services to 13 low-income individuals.

United Samaritans Foundation is located on 220 South Broadway, about 0.2 miles away from the Turlock Hospel Misson Shelter and 0.1 miles away from We Care Turlock. People residing in either of the homeless or transitional shelters in Turlock would be able to access the emergency food box and monthly food support via walk if necessary. HAVEN Turlock Office is located slightly north of Downtown Turlock, where

⁴⁴ City of Turlock, 2025. Homelessness in Turlock. Available: <https://www.turlock.ca.us/government/homelessnessinturlock/>

people experiencing homelessness may access via walk or transit, while Project Sentinel is located in Modesto, accessible via transit from Downtown.

Turlock Gospel Mission Shelter and We Care Turlock are within Downtown Turlock that has access to other amenities and services that serve people experiencing homelessness, such as health care, transportation, retail, employment, and social services that people experiencing homelessness can walk to from the shelters. Downtown Turlock has proximity to local transit lines, including Turlock Transit and Stanislaus Regional Transit Authority bus service. This area sits just south of the Turlock Town Center shopping center, which is home to grocery stores, pharmacies, banks, and medical offices, and is served by local bus routes, including service to Emanuel Medical Center, a full-service hospital in the city.

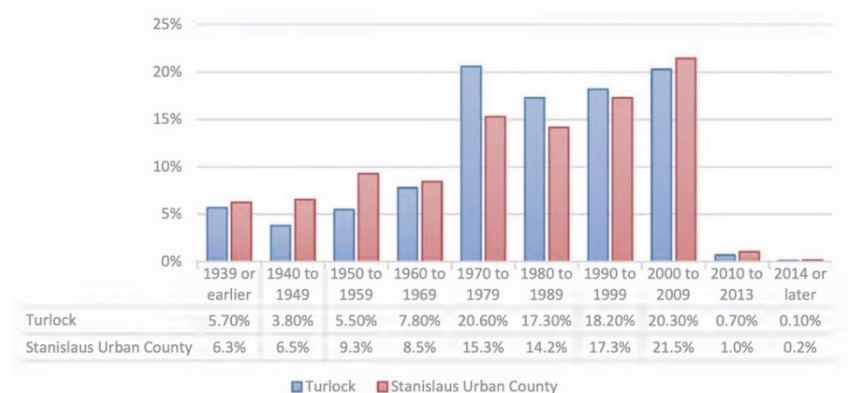
Additionally, the City of Turlock actively participates in regional initiatives to address homelessness through partnerships with the Stanislaus Community System of Care (CSOC) and the Stanislaus Homeless Alliance (SHA). The City of Turlock Care Team collaborates with the Stanislaus County Care Team to offer resources to individuals experiencing homelessness in our community.

Furthermore, the City is actively looking for opportunities to create new transitional and permanent supportive housing. In the Housing Action Plan, Program 2-J, Transitional Housing, and 2-P, Supportive Housing, plan to facilitate production of affordable housing by amending the zoning code to comply with State law regarding the treatment of transitional and supportive housing facilities. Further, Program 4-H, Pursue State and Federal Funds in Support of Housing Development, aims to increase the availability of housing and supportive services to the most vulnerable population groups and those with the greatest unmet needs, including people experiencing homelessness, by pursuing available State and federal funding sources to support efforts to construct housing. See Appendix B, Housing Needs Assessment, and Appendix C, Constraints Analysis, of this Housing Element for more information about homelessness in Turlock and available resources.

SUBSTANDARD HOUSING CONDITIONS

The U.S. Census does not include specific data on substandard housing, but it does provide information about housing problems that are generally used to indicate that a unit is substandard. In addition to structural deficiencies and standards, which are not enumerated, units lacking complete kitchen or plumbing facilities are considered substandard. These conditions are most often found in older housing and the age of a housing unit is often an indicative of housing conditions. About 43 percent of the housing stock in Turlock was built before 1980 compared with 46 percent of the housing units in the Stanislaus Planning and 57.6 percent of the units in Modesto, as shown on Chart D-10.

Chart D-10: Year Structure Built-Turlock and Stanislaus Urban County



Source: 2012-2016 ACS

Housing is subject to deterioration over time and is typically more apparent in lower-income areas where owners may not have the resources needed to keep up with on-going maintenance or to afford rehabilitation. Other problems associated with older housing include problems associated with materials such as lead paint, asbestos, and some varnishes now known to be hazardous to health. Children under the age of six are at the highest risk for physical and mental damage caused by lead paint. Lead-based paint may be present in any housing unit built prior to 1978, when the federal government banned its use in housing. Any household living in substandard conditions is considered in need of assistance, even if they are not actively seeking alternative housing arrangements. Estimating the number of substandard units can be difficult, but the lack of certain infrastructure and utilities can often be an indicator of substandard conditions.

According to 2022 ACS, as shown in Table D-7, about 0.42 percent of owners lack complete kitchen facilities while approximately 2 percent of renters do. Further, approximately 0.66 percent of owners lack complete plumbing facilities while 0.40 percent of renters do. In total, there are 134 occupied housing units with incomplete plumbing facilities and 283 units with incomplete kitchen facilities. Map D-18-27 displays where owner-occupied units experience substandard housing, while Map D-19-28 shows where renter-occupied housing units experience substandard housing. Owner-occupied housing units are more likely to face substandard housing issues near downtown at Tract 39.04 and northeast Turlock at Tract 39.07, likely due to the age of structures in area. Renter-occupied housing units with the highest percent of units experiencing substandard housing are located in north Turlock around CSU, Stanislaus, as well as directly south of railroad tracks along Golden State Boulevard. Overall, based on Census data, substandard housing conditions in Turlock are not overly concentrated in any single area or particularly high as a percentage of existing housing even in the tracts with the highest share. Code Enforcement staff estimates that as much as 10 percent of the total existing housing stock (approximately 2,500 units citywide) may be in need of rehabilitation, based on inspections undertaken in the course of code enforcement activities and their working knowledge of conditions in Turlock. Staff further estimates that rehabilitation needs are highest in older, more centrally located neighborhoods and lower in more recently constructed subdivisions in the north and east of the city.

Table D-7 Substandard Housing Issues, 2022

<i>Housing Type</i>	<i>Owner-Occupied</i>		<i>Renter-Occupied</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
Incomplete Kitchen Facilities	57	0.42%	226	2.03%
Incomplete Plumbing Facilities	90	0.66%	44	0.40%
No telephone service available	69	0.51%	89	0.80%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2018-2022), Table B25053, Table B25043, Table B25049

The Stanislaus Urban County and Turlock Consolidated Plan includes violation of State building and housing codes as an additional indication of sub-standard housing conditions and includes criteria for considering substandard units “suitable for rehabilitation.” To be eligible for rehabilitation under the Plan, a housing unit must fail to meet one or more of the conditions required for a unit to be in standard condition and the cost of bringing the unit into compliance may not exceed 75 percent of the value of the house and the property. Also eligible are units that have been declared unfit or unsafe for occupancy where the cost of the work is not more than 75 percent of the value.⁴⁵ The Action Plan includes a program to continue operation of Turlock’s Rehabilitation Loan program, which offers low-interest loans to qualifying low-

⁴⁵ Stanislaus Urban County & City of Turlock Consolidated Plan Fiscal Year 2020-2025, pp. 125-129

income owners and non-occupant owners of housing in Turlock rented to qualifying tenants with incomes at 80 percent or less than the County AMI. Loans can be used for repairs to electrical, plumbing, broken windows, foundations, pest control to preserve and upgrade homes. Housing Rehabilitation loans are available to low-income homeowners at 0 percent interest for fully amortized loans and 2 percent for deferred loans and 3 percent for improvements to investor-owned property. The loan amount is determined by the scope of the work to be performed. A deferred payment plan is available for very low-income homeowners.⁴⁶

Turlock has partnered with the local We Care Program non-profit groups to renovate existing residential units for low-income families. The project, which is funded through the city's HOME Investment Partnership and the federal Community Development Block Grant program, has completed a four-unit apartment complex and two houses, which are managed by Landlords Property Management, a Turlock-based private company, to provide permanently affordable housing. All housing programs funded by Turlock and Stanislaus County require that units constructed before 1978 be screened and inspected for lead-based paint hazards. Home Consortia projects are usually inspected by the County Housing Authority and County building inspectors inspect any ESG Rapid Re-Housing units. In Turlock, We Care applies the same rules to the units it provides for homeless individuals and households. Contractors bidding on the rehabilitation of homes built prior to 1978 are required to provide documentation of EPA Lead Renovation and Repair and Painting certification. If lead is found in any housing unit, after the work has been completed, a lead-based paint clearance test must be conducted by a licensed contractor with expertise in this type of work. Final payment is not released until the unit has passed the lead-based paint testing requirements.

Turlock has seen continued residential development over the past decade, including new subdivisions and multi-family projects, though the rate of construction declined due to the mortgage crisis. Notable subdivisions include Park Villas, a 175-unit air space condominium project where the proposed density would be 24.5 dwelling units per acre in 2019. McCoon Townhomes anticipated 40 townhomes with lot sizes ranging from approximately 1,600 square feet to 2,200 square feet in size. Particularly within the East Tuolumne Master Plan Area, two subdivisions, Fairbanks Ranch and Les Chateaux, saw a total of 189 new single-family homes on the southeast corner of North Johnson and East Tuolumne roads. These specifically have been the largest housing development in Turlock since the Great Recession.⁴⁷ In terms of differences between new subdivision and older areas, majority of new construction, both singly family and apartments, is concentrated in above moderate categories, which sustains the general trend of higher rents and home prices in development. Older areas, closer to Downtown tend to have higher density and are more affordable, though sometimes have substandard housing stock. The existing housing stock is overwhelmingly dominated by single-family homes and multi-family complexes that have more than 20 units. Missing middle housing, such as smaller complexes, like duplexes, triplexes, are not widely available across all neighborhoods in Turlock.

⁴⁶ City of Turlock, Housing Rehabilitation Loan Program
<https://ci.turlock.ca.us/housingprograms/housingrehabilitationloan/>

⁴⁷ Turlock Journal. 2018. Turlock sees return of new housing development. Available:
<https://www.turlockjournal.com/news/local/turlock-sees-return-of-new-housing-development-2/>

LARGE FAMILIES

Large families are those households of five or more related individuals. Housing of sufficient size and number of bedrooms is a special need of this group, as appropriate size housing would prevent overcrowding. Cost is an additional important consideration, as many large families especially in California do not have sufficient income to afford larger homes or apartments. Large households make up about 12.6 percent of households in Turlock, which is less than the 17.8 percent of large households in Stanislaus County. Of the large families within Turlock, approximately 17.5 percent are considered extremely low- or very low-income households (i.e., households below 50 percent AMI). About 30.9 percent of large families in Turlock experience some level of cost burden (either regular or severe), while 37.5 percent of all other household types experience cost burden. Large families are more likely to experience cost burden, but less likely to experience severe cost burden compared to all other household types in Turlock.

Turlock Unified School District (TUSD) Family Resource Center (FRC) is a hub of support that provides resources, programs, and services based on the needs and interests of families. The Family Resource Center provides programs that support school readiness, hosts parent workshops, links students and families to community assistance, and provides specialized support to foster youth, students experiencing homelessness, and refugees/newcomers. The City of Turlock's Housing Program Services provides sources and assistance to families in the search for housing. City staff refers families to 211 Stanislaus County, operated by United Way of Stanislaus County, which is a confidential information and referral service that includes referrals to resources like utility and rental assistance, housing, food, health, and legal needs.⁴⁸ City staff also refers large families to Stanislaus Regional Housing Authority for programs that may be more pertinent to their circumstances that may not be offered by the City, such as farmworker housing, migrant housing, and family self-sufficiency programs⁴⁹.

OLDER ADULTS

Older adults in Turlock, especially renters, are more likely than the overall population to be cost burdened. According to the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 20 percent of households with at least one older adult aged 62 and over in Turlock have an income below 30 percent of AMI, higher than the rate of 13.8 percent found among the overall population in Turlock. Older adult households considered very low-income (making between 31 and 50 percent of AMI) are the group most likely to be spending more than 50 percent of their overall household income on housing costs at 44.4 percent. Older adult households who are considered extremely low-income (making less than 30 percent of AMI) are more likely than those considered very low-income to be spending over 50 percent of their income on housing costs at 49 percent. Senior renters are much more likely to fall into the extremely low-income (zero to 30 percent of AMI) or very low-income (31 to 50 percent of AMI) categories than seniors who own their homes (35.9 percent versus 12.1 percent, respectively). As they age, older adults may face additional housing costs to ensure their homes remain accessible and to eliminate threats to health and safety. Like all lower income residents, older adult residents may be facing overpayment problems or are unable to find affordable rental units at all.

Various agencies and community organizations offer resources for older adults throughout the County and Turlock. Stanislaus County offers an Elderly Nutrition Program that provides meals for adults older than 60 years of age, that offer fresh made meals. In Turlock, older adults can receive a fresh meal Monday

⁴⁸ United Way of Stanislaus County, 2025. 211 Stanislaus County. Available: <https://www.stancounty211.org/>

⁴⁹ Stanislaus Regional Housing Authority, 2025. Programs. Available: <https://stanregionalha.org/programs/>

through Friday at the Turlock Salvation Army.⁵⁰ United Samaritans Foundation offers emergency food boxes and mobile lunch programs for those in need. In terms of housing,

cCurrently, Turlock has 1,252 assisted units reserved for seniors located on 12 different properties, as discussed in Appendix B: Housing Needs Assessment. None of the developments are 100 percent affordable, but eight of the 12 developments accept Section 8 vouchers, which means that up to 1,003 units are potentially available to older adults meeting the income requirements for affordable housing. Senior housing may be most attractive to the oldest cohort (85 years and older), as younger seniors often prefer to continue living independently.

D.6 Other Relevant Factors

The history of Turlock reflects multiple waves of settlement and agricultural development. It was founded in 1871 by John William Mitchell, as a depot for the Southern Pacific Railroad, which drove in early freight and passenger traffic, further attracting settlers and businesses. The establishment of the Turlock Irrigation District under the Wright Act brought irrigation water that enabled crop diversification, which spurred the agricultural industry and population growth from the early 1900s. More information about immigration and development can be found in Section D.2 Segregation and Integration. Historically throughout the U.S., including in California and Stanislaus County, restrictive and exclusionary zoning practices have contributed to racial and economic segregation.

Turlock was the site of one of several temporary detention camps established during the first phase of the mass incarceration of 97,785 Californians of Japanese ancestry during World War II. The Stanislaus County Fairgrounds is now located in central Turlock, in Tract 38.04 where it and surrounding tracts are deemed racially integrated, as shown on Map D-1. Due to a boom in population attributed to the expansion of State Route 99 in the 1970s, Turlock grew west to meet the freeway's north-south path. This area is also where most of the city's low-medium segregation tracts are located, as well as the City's only High Segregation and Poverty tract, census tract 38.02 (see discussion in Section D.3).

Turlock's land use and zoning history has steered growth toward agriculture-supporting, low-density residential neighborhoods. Commercial/industrial corridors are concentrated along major roads (notably State Route 99 and West Main), while infrastructure investments and corridor rehabilitation projects have actively shaped where jobs, retail, and higher-density development locate in the city. Policy direction is codified in Turlock's General Plan and zoning regulations, and recent updates, particularly in the Housing Element and in the Westside Industrial Specific Plan, reflect attempts to balance industrial growth, infill opportunities, and workforce housing, all of which affect patterns of investment and property values across neighborhoods.

Turlock has several defining physical and infrastructural features that influence land use and socio-economic patterns. It lies on relatively flat terrain in the San Joaquin Valley, which has made large-scale agricultural use feasible and later urban expansion easier, as there is less constraint due to topography. A major feature is the presence of rail lines: the city is planned to be served by the Altamont Corridor Express (ACE) extension project with a planned passenger rail station in Turlock, which would provide commuter and intercity rail access. Also, the city has long been shaped by freight rail corridors, including lines owned

⁵⁰ Stanislaus County, 2025. Aging and Veterans Services – Senior Lunch Programs. Available: <https://www.stancounty.com/aging/hvc-senior-meals.shtm>

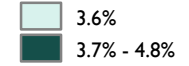
by the Union-Pacific Railroad. The main Union-Pacific line runs parallel to Golden State Boulevard and connects the city to a vast statewide and interstate rail network via the City of Modesto to the north and the City of Fresno to the south. The secondary Union-Pacific line that serves primarily rural areas west of Turlock. The BNSF line runs roughly parallel to the Union-Pacific line, connecting to the Cities of Stockton and Modesto to the north and the City of Fresno to the south. In terms of roadways, one major highway is California State Route 99 (State Route 99), which passes through Turlock and is a key regional north-south corridor connecting to other Central Valley cities. Also, California State Route 165 ends in Turlock, linking rural areas south to Turlock via a state highway. The city's General Plan identifies major regional expressways and interchanges as part of its circulation infrastructure.

The City publishes development impact fee and capital improvement fees reports: the most recent FY 2023-24 AB 1600 report shows active fee programs for master and specific plan areas (Northwest, Northeast, North Turlock, and East Tuolumne) covering sanitary sewer, water, transportation, storm drainage, and more.⁵¹ This report show that the city is collecting fees and planning infrastructure improvements in growth areas, but also note that some transportation, storm, and drainage improvements are not yet expended or are in fund balances.

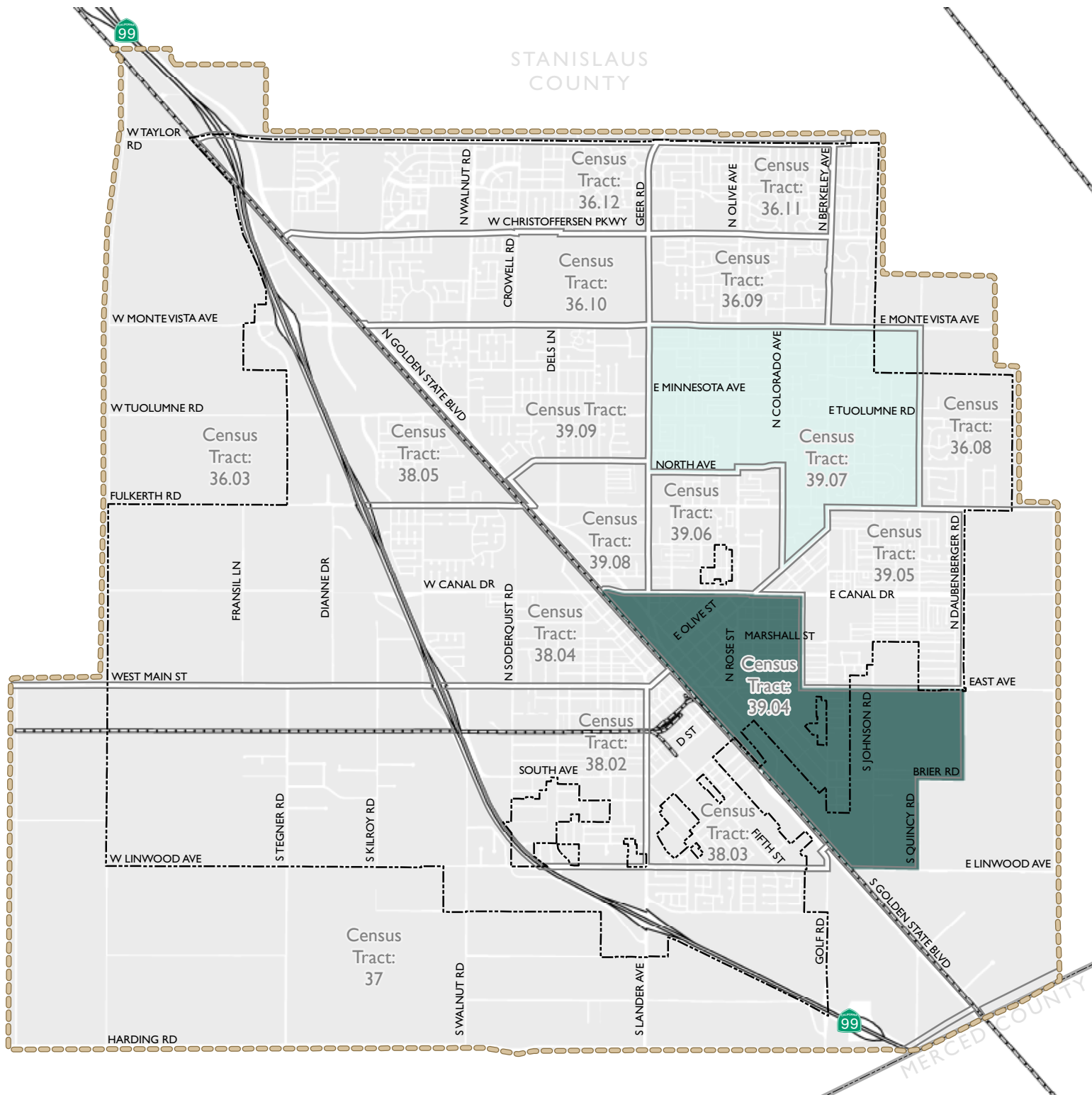
⁵¹ City of Turlock. AB 1600 Annual Report and Five-Year Report for Development Impact Fees. 2024. Available: <https://www.cityofturlock.org/pdf/devfeesreport.asp?id=8>

Substandard Housing, Owner-Occupied

Two or More Issues, Owner Occupied

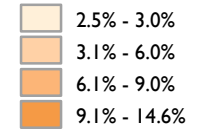


- Study Area Boundary
- City Limit & County Island
- County
- Railroad

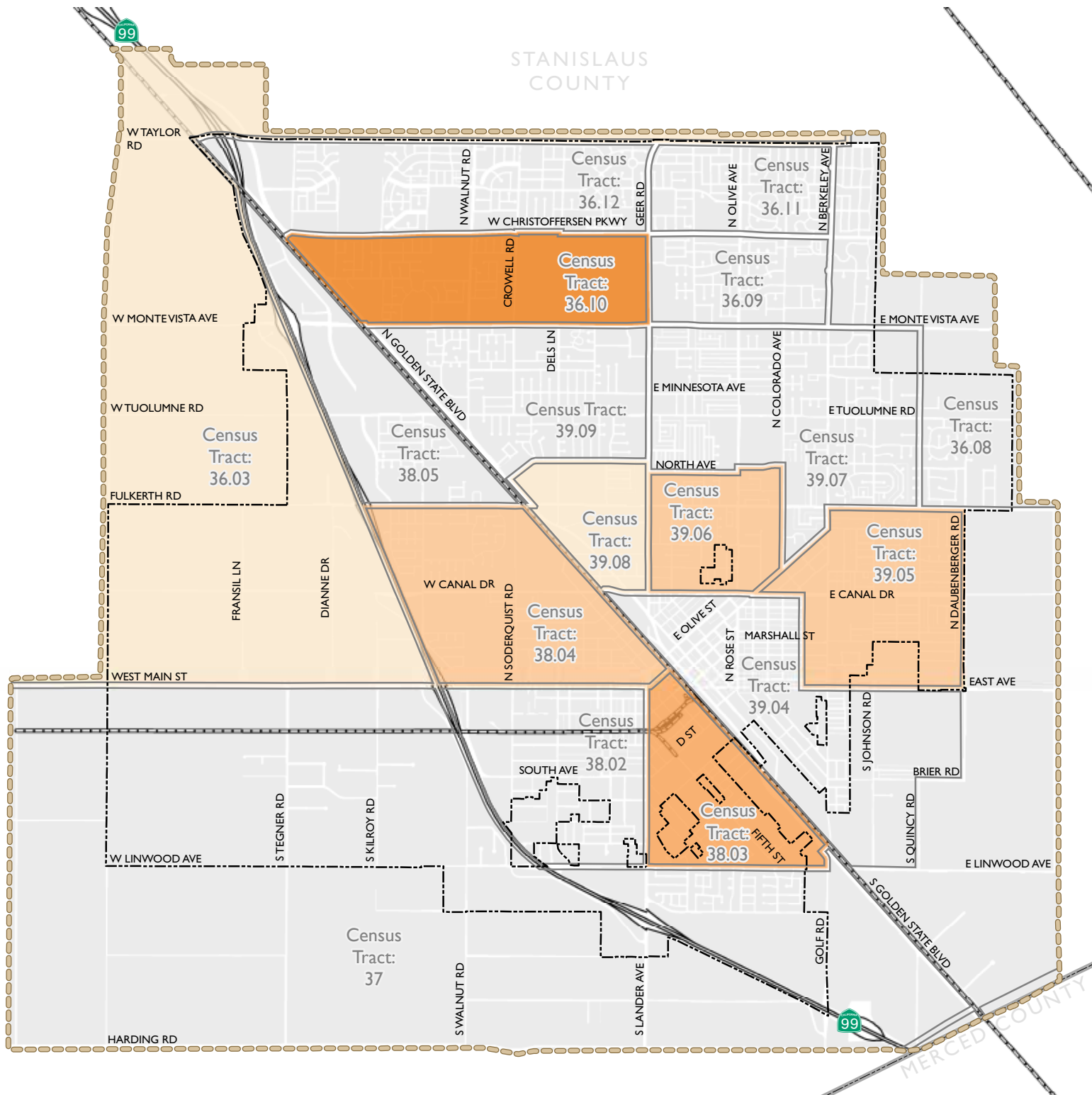


Substandard Housing, Renter-Occupied

Two or More Issues, Renter Occupied



- Study Area Boundary
- City Limit & County Island
- County
- Railroad



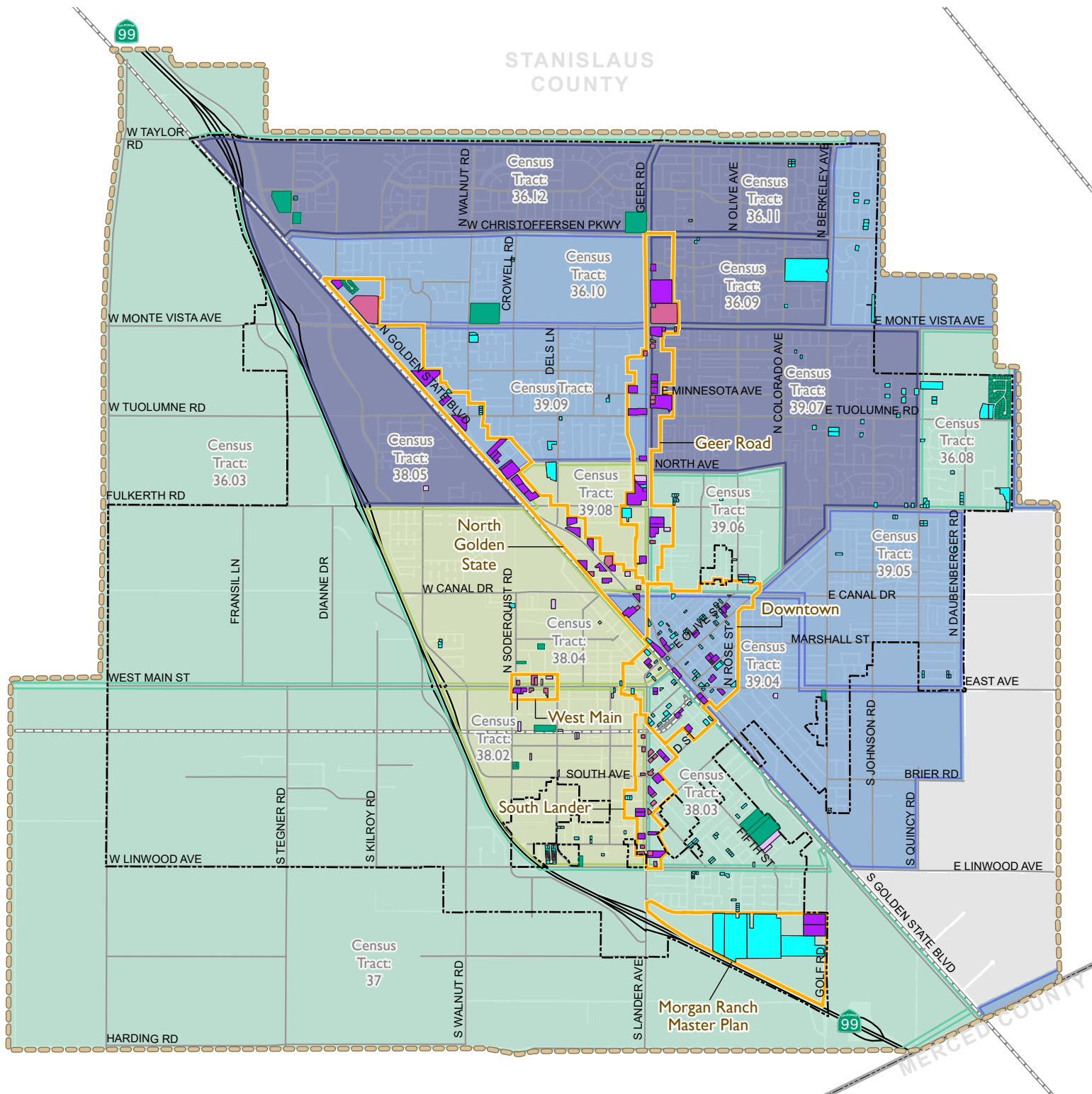
D.6D.7 Sites Inventory

State law requires a jurisdiction to identify sites to meet its RHNA obligations throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. This includes ensuring that sites are distributed such that they combat housing discrimination, eliminate racial bias, redress historic patterns of segregation, and lift barriers that restrict access. Affirmatively furthering fair housing will help foster inclusive communities so that households at all income levels and of all racial/ethnic makeups can enjoy a more equitable distribution of opportunity and proximity to jobs, transit, a high-quality education, and environmental benefits. To satisfy this requirement, the extent to which buildout of the Sixth Cycle Housing Element inventory may further entrench or help ameliorate existing patterns of segregation and/or exclusion of protected categories was assessed.

~~ACCESS TO OPPORTUNITY~~

Buildout of the sites inventory will result in creation of new homes for 3,842 low- and moderate-income households, which represents a 20.8 percent increase in the number of LMI households in the City over the planning period. ~~As described above and shown in Map D-20, most of the eastern and northern portions of the city areas are designated as Highest, High, and Moderate Resource on TCAC maps. There are Low Resource and High Segregation & Poverty areas in the center and west of the city. This is a relative ranking based on composites of environmental, economic, and education scores. As a result, buildout of the inventory can increase access to educational, economic, and environmental opportunity for disadvantaged and marginalized populations and help to affirmatively further fair housing in the city and in the Stanislaus Region. Map D-290 and Table D-8 show the distribution of new housing units to Census tracts within the planning area, together with relevant socio-demographic data and existing conditions for each tract. There are 17 census tracts within Turlock, of which 16 can accommodate the projected buildout of the inventory. One tract, Tract 36.03, is located on the west side of the city and does not see any projected units during the planning period. This tract is within the Westside Industrial Specific Plan area, meant to facilitate economic and job development. There is no land zoned for residential development; therefore, there are no units accommodated in this tract.~~

Sites Inventory Analysis and TCAC Opportunity Areas, Composite Score



Sites Inventory

- Above Moderate Income
- Moderate Income
- Low/Very Low Income
- Mixed Income

- Residential Pipeline Projects
- Opportunity Area

Composite Score (HCD, 2024) - Tract

- Highest Resource
- High Resource
- Moderate Resource
- Low Resource

- Study Area Boundary
- City Limit & County Island
- County
- Railroad

As shown in Table D-8, buildout of the inventory would generally increase the share of LMI households in Highest and High Resource tracts in Turlock and decrease that share of LMI households in Moderate Resource tracts, thereby improving the overall balance of income segments in different areas throughout the residential part of the city. Further, the development of ADUs/IADUs and affordable housing on properties owned by religious institutions through the congregational overlay (Program 1-F) would create additional housing opportunities for LMI households in High and Highest Resource areas beyond that shown in Table D-8. Projections for the number of ADUs and congregational housing units are done at a citywide level, therefore they cannot be attributed to specific parcels and reflected in the total in Table D-8; however, these strategies would further contribute to a better balance of housing types within the community, would increase access to opportunity for lower and moderate income households in High and Highest Resource tracts in Turlock.

Also as shown in Table D-8, the share of LMI households in two tracts classified as Low Resource on T/CAC maps would slightly increase with buildout of the inventory: the share of LMI households would increase from 60.3 percent to 60.7 percent in tract 38.02 and would increase from 71.2 percent to 74.1 percent in tract 39.08. However, both these tracts are classified as "at risk of displacement" and currently have among the highest rates of rent burdened and overcrowded households. Increasing the supply of affordable housing in these tracts will create more housing opportunities for LMI households in these locations and should help to alleviate cost burden and overcrowded living conditions. Further, both tracts are centrally located in Turlock, with easy access to employment, services and transit. Tract 39.08 is located adjacent and to the north of downtown between Geer Road and North Golden State Boulevard and has the highest transit performance score in Turlock (see Map D-2243). Tract 38.02, located just southwest of downtown also has one of the best transit performance scores in the city. Additionally, through Program 3-E, the City will implement place-based community investment efforts aimed at lower resource areas, including infrastructure investments and the provision of programs for residents. These include: 1) construction of the Columbia Pool and site improvements to serve neighborhoods in southwest Turlock; 2) repavement and rehabilitation of various street segments in the southwest quadrant of Turlock and installation of ADA-compliant access ramps; 3) re-surfacing and re-striping of the multi-purpose court at Columbia Park, and 4) recreational programming, including fitness programs, family events, community traditions, arts, social and educational activities, and a wide range of enrichment classes with scholarships available for participation.

Overall, buildout of the inventory would have a beneficial effect on access to opportunity, patterns of segregation and integration, and disproportionate needs and displacement risk, as described further below.

ACCESS TO OPPORTUNITY

As described above and shown in Map D-1220, most of the eastern and northern portions of the city areas are designated as Highest, High, and Moderate Resource on TCAC maps. There are Low Resource and High Segregation & Poverty areas in the center and west of the city. This is a relative ranking based on composites of environmental, economic, and education scores. As discussed above, there are no R/ECAPS in Turlock, but one Census tract along the eastern edge of the city is classified as a RCAA (tract 39.05). Existing development in this tract is predominantly single family residential and zoning is R-L (Low Density Residential). The tract contains newly constructed subdivisions and there is little vacant land available and limited opportunities for multifamily development. Accordingly, the inventory projects only 15 new units during the planning period, all of which would be for above moderate households. However, as shown on Map 3-9 in chapter three there are two churches with vacant and underutilized land potentially available for affordable housing pursuant to Program 1-F, which would create a congregational housing overlay to facilitate the development of affordable housing on properties owned by religious institutions in Turlock and provide technical support for interested property owners. There are also a dozen other churches with

vacant and underutilized land in High and Highest Resource areas in Turlock that would also be eligible for the congregational housing overlay, further increasing access to opportunity for low and moderate income households. Additionally, the construction of ADUs and JADUs in these established neighborhoods would provide additional housing opportunities for low and moderate income households in High and Highest Resource areas, including Tract 39.05.

Tract 37 is one of the largest Census tracts in the planning area, encompasses the Morgan Ranch Master Plan area, and has most acres of appropriate size for lower income RHNA, based on the criteria defined in State law. Tract 37 is classified as a moderate resource opportunity area. The Morgan Ranch Master Plan area envisions the development of a local shopping center, an elementary school, a park, and community facilities within the planning period, that would increase the access to opportunity for residents of this tract and adjacent Tract 38.03. Respectively, Tract 36.09 and Tract 36.1 are highest and high resource opportunity areas, which envision the integration of mixed-income housing and a diversity of housing types. This would suit a variety of Turlock's residents in these high and highest resource areas, demonstrating excellent access to educational, economic, and environmental opportunity for populations residing within or around these tracts. Therefore, buildout of the inventory would have a beneficial effect on access to opportunity in the city.

As a result, buildout of the inventory can increase access to educational, economic, and environmental opportunity for disadvantaged and marginalized populations and help to affirmatively further fair housing in the city and in the Stanislaus Region.

SEGREGATION AND INTEGRATION

~~Map D-20 shows the City of Turlock divided by areas in order to assess the buildout of the sites inventory. Each area accounts for roughly one third of the City's sites inventory, as outlined in Table D-8, as Areas 1 and 3 allocate 35 percent of the inventory, respectively, while Area 2 allocates 30 percent of the inventory. Table D-8 shows the distribution of new housing units to Areas 1, 2, and 3 within the planning area, together with relevant socio-demographic data for each area.~~

~~Area 1 is the largest geographical area displayed on Map D-20, containing all seven Census tracts southwest of the railroad tracks that dissect Turlock. Area 1 features the Morgan Ranch Master Plan area, South Lander and West Main opportunity areas, and additional unincorporated Stanislaus County land. The Morgan Ranch Master Plan area envisions the development of a local shopping center, an elementary school, a park, and community facilities, that would increase the access to opportunity for residents. Area 1 contains relatively more land that meet the criteria established in State law for lower income RHNA sites and demonstrates high potential for development within the planning period. Compared to Areas 2 and 3, Area 1 has a relatively low amount of rent-burdened households in Turlock at 42.8 percent, though the rate of overcrowding is slightly higher, at 5.9 percent. Risk of displacement is low in Area 1, though one Tract 38.02 identified as High Segregation and Poverty, is at risk of displacement. Overall, with the development of local-serving shopping and resources, buildout of the inventory would increase access to opportunity for lower and moderate income households.~~

Map D-1 indicates that many areas of the City of Turlock are relatively racially and ethnically integrated, and that the City is less segregated than the County as a whole. There are five R/ECAPs in the central part of Stanislaus County, where Turlock, Modesto, and Ceres, the three most populous cities in the county are located. None of these R/ECAPs are in Turlock but one census tract (Tract 38.02 in Area 1) in Turlock does meet the Tax Credit Allocation Committee/HCD criteria as a High Segregation and Poverty (HSP) tract (Map D-118). Map D-118 shows the locations of RCAAs; within Turlock, two RCAAs are located along the very eastern edge of the city and outside the city to the east (Tracts 36.08 and 39.05 in Area 3).

Tract 38.02, the High Segregation and Poverty tract, is bordered on the west by SR-99, intersected by the railroad, and includes three unincorporated county islands. Tract 38.03, to the east, also has three county islands and is identified as a low resource area using the TCAC/HCD criteria. The population of these two tracts and Tract 38.04 is predominantly Hispanic, ranging from 51.4 to 73.1 percent Hispanic. Since 1990, Tract 38.02 has seen an increase in Hispanic or Latino residents and a decrease in non-Hispanic White residents that reflects Turlock's overall demographic changes (Table D-4).

As displayed in Table D-8, there is a significant variation in the levels of concentration of non-White population throughout the City. The southern areas of Turlock have a higher concentration of non-White population (Tract 37, 38.02, 38.03 and 38.04). The tracts with a larger non-White population also generally have a larger low-moderate-income population than more northern areas of the City. Between 2020 and 2022, the non-Hispanic White population has continued to decrease, constituting 41.2 percent of the population in 2022, and the Hispanic or Latinx population increased to 44.4 percent.

The City is increasing opportunities for a variety of housing types and higher density housing, through the creation of Workforce Housing Overlay in areas of the City that currently have a lower concentration of non-White population, like Geer Road and North Golden opportunity areas, as well as northern portions of Turlock. There is a common correlation between wealth and race, so creating opportunities for lower-income high density housing in these areas may lead to a more even distribution of the population. The City is also including Program 1-E to incentivize and promote ADU development to increase opportunities for lower income households in lower density, high opportunity areas of the City. This includes increased outreach strategies and preparation of application checklist and informational handouts. Throughout buildout of the inventory and implementation of Programs 1-B Workforce Housing Overlay and 1-G Congregational Overlay, the City will integrate mixed income throughout Area 1 and 2, specifically in Tract 38.02, to ensure units will be affordable to moderate and lower income households. Additionally, implementation of Programs 1-E, 1-F, and 6-C will incentivize and promote the creation of affordable ADUs and JADUs by initiating awareness of options and benefits for homeowners seeking to develop ADUs, creating pre-approved ADU plans, and monitoring ADU and JADU trends, specifically targeted at developing in RCAAs. Further, the implementation of Program 5-A, 5-B, 5-C, and 5-D will enforce fair housing laws and address discrimination in the building, financing, selling, and renting of housing based on race, family status, national origin, and work to integrate all households, regardless of ethnicity, race, family composition, and source of income, into the housing cloth of Turlock. Therefore, overall buildout of the inventory would have a beneficial effect on the prevailing pattern of concentrated affluence in Stanislaus County and would not exacerbate patterns of segregation.

DISPROPORTIONATE NEEDS AND DISPLACEMENT RISK

While only three tracts (~~Tract 38.02 in Area 1~~, ~~Tracts 39.06~~, and ~~Tract 39.08 in Area 2~~) in the city are considered at risk of displacement, cost burden is widely prevalent in Turlock. Cost burden is a major issue for older adults, students, and low-income households in Turlock, and is more evenly distributed by race and ethnicity than by location (Map ~~D-2314~~ and ~~D-2415~~ and Charts D-6 and D-7). Notably, between 60 and 80 percent of homeowners in ~~Tract 36.03 in Area 1~~ immediately west of Turlock are cost burdened, while 60 to 80 percent of renters in ~~Tracts 39.06, 39.08, and 39.09 in Area 2~~ in the heart of Turlock are cost burdened.

Buildout of the inventory focuses housing development in tracts that have lower displacement risk and lower percent of overcrowded households, particularly in the northern and southern portion of Turlock (~~Tracts 36.09, Tract 36.10 in Area 2, and Tract 37 in Area 1~~). However, the inventory also accommodates about 10 percent of units within ~~Tract 39.08 in Area 2~~ that has higher rates of overcrowding and risk of displacement. As noted above, this tract has close proximity to shops, services, transit, and jobs near

Downtown Turlock. Buildout of inventory would focus additional below market rate housing throughout Area 2 Tract 39.08, Tract 39.09, and Tract 37, which would alleviate displacement pressure and relieve overcrowding.

The City is including Program 3-B Anti-Displacement Strategy, where the City will prepare an anti-displacement strategy with the following components to help prevent displacement of vulnerable residents. The first component of the strategy would be preservation of subsidized affordable housing units by partnerships with Stanislaus Regional Housing Authority, funding for rehabilitation of substandard multi-family units, and restricting the conversion of existing units occupied by lower-income units. The second component of the strategy entails partnering with nonprofits to share information on fair housing to underserved residents, while the final component would include developing an engagement strategy to disseminate information on tenant rights and protections. The City will also continue to support individuals and households with special needs by aiding the facilitation of production of affordable housing with administrative assistance (Program 4-A), partnering with the Disability Resource Agency for Independence Living (DRAIL) to promote availability of service and programs (Program 4-B), offering rental and mortgage assistance and connecting residents in need with Community Housing and Shelter Services (CHHS) (Program 4-D), and continuing to administer the Mobile Home Rent Subsidy program which provides assistance to eligible existing mobile homeowners (Program 4-F). These programs and efforts will continue to promote improvements in special needs populations that are affected by disproportionate housing needs.

Table D-8: AFFH Housing Element Sites Analysis

Existing Conditions										Projected New Units				
Tract	Existing Households	Low to Mod. Income Households	Percent LMI Households	Rent Burdened Households	Overcrowded Households	HCV Use	Non-White Population	Displacement Risk	T/CAC Resource Category	Lower Income Units	Moderate Income Units	Above Moderate Income Units	Total Projected 2031 Units (Existing + New)	Projected Percent LMI
36.03	1,409	764	54.20%	27.90%	6.70%	NA	37.00%	Lower	Moderate	0	0	0	1,409	54.20%
36.08	2,114	708	33.50%	26.30%	7.30%	NA	33.70%	Lower	Moderate	0	0	113	2,227	31.80%
36.09	1,134	363	32.00%	46.20%	6.80%	15.50%	36.70%	Lower	Highest	257	201	259	1,851	44.40%
36.1	1,807	1001	55.40%	56.00%	8.60%	15.01%	60.60%	Lower	High	35	394	286	2,522	56.70%
36.11	1,303	397	30.50%	71.90%	10.20%	4.03%	49.10%	Lower	Highest	0	0	7	1,310	30.50%
36.12	2,544	664	26.10%	58.00%	3.90%	1.66%	56.40%	Lower	Highest	0	161	308	3,013	27.40%
37	1,380	654	47.40%	44.10%	14.10%	8.83%	74.30%	Lower	Moderate	450	0	890	2,720	40.60%
38.02	1,578	951	60.30%	54.80%	15.50%	3.74%	85.00%	At Risk of Displacement	Low	85	66	85	1,814	60.70%
38.03	806	346	42.90%	50.20%	22.00%	3.14%	87.80%	Lower	Moderate	191	101	292	1,390	45.90%
38.04	2,273	1383	60.80%	29.90%	8.40%	4.84%	76.50%	Lower	Low	32	51	45	2,401	61.10%
38.05	1,132	371	32.80%	37.50%	1.10%	2.60%	64.20%	Lower	Highest	0	11	0	1,143	33.40%
39.04	1,879	1091	58.10%	40.20%	8.60%	20.93%	57.20%	Lower	High	309	9	179	2,376	59.30%
39.05	1,688	581	34.40%	33.30%	0.80%	NA	27.40%	Lower	High	0	0	15	1,703	34.40%
39.06	1,993	1379	69.20%	48.90%	7.60%	9.80%	63.00%	At Risk of Displacement	Moderate	114	28	44	2,179	69.80%
39.07	2,923	1138	38.90%	56.90%	0.90%	4.16%	27.80%	Lower	Highest	214	29	43	3,209	43.00%
39.08	1,086	773	71.20%	65.40%	11.00%	16.34%	65.20%	At Risk of Displacement	Low	487	62	150	1,785	74.10%
39.09	2,374	1163	49.00%	54.60%	2.90%	8.87%	56.80%	Lower	High	548	7	33	2,962	58.00%

Source: 2023 5-Year ACS Estimates, HUD, UDP, Dyett and Bhatia, 2025

D.7D.8 Summary and Conclusions

State law requires that jurisdictions identify fair housing issues as well as contributing factors and priority levels for each factor. Further, a jurisdiction must identify specific goals and actions it will take to reduce the severity of fair housing issues within that jurisdiction. This section fulfills these requirements based on the assessment provided above, as well as relevant information from the 202-2025 AI. Goals and actions related to AFFH are incorporated into the broader Housing Action Plan contained within Chapter 4 of this Housing Element.

The most significant fair housing issues in Turlock relate to housing cost burden, overcrowding, and segregation by income level. Although Turlock is a majority-minority community, the census tracts with the greatest share of non-White Hispanic or Latino residents are also the ones experiencing the highest poverty rates, environmental burdens, and displacement risks. There is also some evidence of racial/ethnic discrimination in lending services, as well as geographic concentrations based on familial status.

Based on the findings of this assessment, Table D-9 presents a summary of existing fair issues and their contributing factors, as well as a description for each. Issues that are primarily related to environmental justice or economic development and do not have a direct bearing on fair housing are ranked as low or not included. Priority levels were assigned as follows:

- **High** – Designates contributing factors that limit or deny fair housing choice (i.e., has the potential to violate the Fair Housing Act).
- **Medium** – Designates contributing factors which should be addressed in the near term. These issues do not violate the Fair Housing Act but may increase fair housing issues in the city. These factors may be beyond the City's immediate capabilities to address.
- **Low** – Designates contributing factors that either do not need to be or cannot be addressed immediately by the city but should be addressed later on during the eight-year planning period.

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.	• Lack of awareness of tenant rights • Linguistic isolation	• Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 5-C Anti-Discrimination Training	Citywide and in DACs	• Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Assist 30 households during the planning period (Program 5-B) • Increase awareness of fair housing practices among small, independent real estate professionals and lenders over the planning period (Program 5-C)
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.	• Financial literacy of affected groups • Lending discrimination	• Program 5-A Fair Housing Information • Program 5-C Anti-Discrimination Training	Citywide	• Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Increase awareness of fair housing practices among lenders over the planning period (Program 5-C) • Percent change in denial rates
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.	• Lack of training/awareness of fair housing law • Lack of awareness of tenant rights	• Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 5-C Anti-Discrimination Training • Program 4-B Support for Individuals with Disabilities	Citywide	• Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Assist 30 households during the planning period (Program 5-B) • Increase awareness of fair housing practices among small, independent real estate professionals and lenders over the planning period (Program 5-C) • Increase in participation in DRAIL programs and services by Turlock residents (Program 4-B)
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.	• Historical settlement patterns in Turlock • Neighborhoods in the north and east are predominantly comprised of single-family housing, often not affordable for disadvantaged groups.	<u>Expand housing choice and housing mobility in north and east of Turlock</u> • Program I-E ADU/JADU Awareness • Program I-F Pre-Approved ADU Plans • Program I-G Congregational Overlay • Program I-C SB9 Ordinance • Program I-D Small Lot Subdivision Ordinance • Program 5-D Disavowal of Racially Restrictive Covenants <u>Prevent Displacement of Existing LMI Households</u> • Program I-B Workforce Housing Overlay • Program 5-A Fair Housing Information	Center and southwest Turlock	<u>Expand housing choice and housing mobility in north and east of Turlock</u> • Issue 15 ADU/JADU construction permits annually over the planning period (Program I-E) • Construction of 10 new ADU/JADUs in Turlock annually over the planning period (Program I-F) • 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) • 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) • Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock (Program I-D)

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
				- Program 5-B Mediation and Enforcement - Program 3-H Anti-Displacement Strategy - Program 6-D Development and Replacement Unit		- 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) <u>Prevent Displacement of Existing LMI Households</u> - Adopt the Workforce Housing Overlay by January 31, 2025; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B) - Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) - Assist 30 households during the planning period (Program 5-B) - Prepare anti-displacement strategy by end of Q4 2025, being implementation in Q1 2026; minimize or prevent displacement of at-risk residents (Program 3-H) - Beginning in Q4 2024; protection of existing housing (Program 6-D)
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.	- Historical settlement patterns - Lack of housing options for LMI households in High Resource areas - Income and educational attainment levels	- Program 1-E ADU/JADU Awareness - Program 1-G Congregational Overlay - Program 1-C SB9 Ordinance - Program 1-D Small Lot Subdivision Ordinance	DACs with more than 50% LMI households (tracts 38.02; 38.03; 38.04; 39.04; 39.08)	- Issue 15 ADU/JADU construction permits annually over the planning period (Program 1-E) - 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) - 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 1-C) - Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock (Program 1-D)
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.	- Income and educational attainment levels - Lower performance scores	<u>Enhance Income and Educational Attainment</u> - Workforce Development Initiates (Program 5-F) <u>Raise Performance Scores</u> - Chatom Union School District (CUSD)’s instructional support programs that include homework support and academic intervention including math and reading - TUSD’s Family Resource Center provides resources, programs, and services to diverse Turlock families, that include school readiness programs for students in need	Citywide; southwest Turlock	- 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 (Program 5-F) - Higher performance scores in English and Mathematics throughout Turlock during the planning period
High	Access to Opportunity	Census tracts west of the BNSF railroad tracks have environmental opportunity scores than rank among the worst 25 percent statewide. These areas also have higher shares	- Historical settlement patterns - Exposure to air pollution and DPM - Lower tree canopy coverage	- Program 3-A Home Rehabilitation Loan Program - Program 3-B Acquisition and Rehabilitation of Property for Affordable Housing	DACs west of the BNSF tracks	- Provide 10 loans annually throughout the planning period (Program 3-A) - Provide 14 loans annually throughout the planning period (Program 3-B)

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
		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.	• Access to healthcare and health insurance coverage	• Program 3-C Neighborhood Clean Up Programs • Program 3-E Place-Based Community Improvement Efforts		• Operation of various projects; throughout the 2023-2031 planning period (Program 3-C) • 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)
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.	▪ 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	• Program 1-B Workforce Housing Overlay • Program 3-A Home Rehabilitation Loan Program • Program 3-B Acquisition and Rehabilitation of Property for Affordable Housing • Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 3-H Anti-Displacement Strategy • Program 6-D Development and Replacement Unit Requirements	DACs with elevated risk of displacement (Tracts 38.02, 39.06, and 39.08)	• Adopt the Workforce Housing Overlay by January 31, 2025; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B) • Provide 10 loans annually throughout the planning period (Program 3-A) • Provide 14 loans annually throughout the planning period (Program 3-B) • Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A) • Assist 30 households during the planning period (Program 5-B) • Prepare anti-displacement strategy by end of Q4 2025, being implementation in Q1 2026; minimize or prevent displacement of at-risk residents (Program 3-H) • Beginning in Q4 2024; protection of existing housing (Program 6-D)
High	Disproportionate Needs	<u>Cost Burden</u> 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.	▪ 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	• Program 1-B Workforce Housing Overlay • Program 1-C SB9 Ordinance • Program 1-D Small Lot Subdivision Ordinance • Program 1-E ADU/JADU Awareness • Program 1-F Pre-Approved ADU Plans • Program 1-G Congregational Overlay • Program 5-A Fair Housing Information • Program 5-B Mediation and Enforcement • Program 3-H Anti-Displacement Strategy • Program 6-D Development and Replacement Unit Requirements	Citywide	• Adopt the Workforce Housing Overlay by January 31, 2025; 626 moderate and 1,544 lower income RHNA units by 2030 (Program 1-B) • 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 1-C) • Adopt the ordinance by Q1 2028, increase the supply of entry level homes and expand options for homeownership in Turlock (Program 1-D) • Issue 15 ADU/JADU construction permits annually over the planning period (Program 1-E) • Construction of 10 new ADU/JADUs in Turlock annually over the planning period (Program 1-F) • 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) • Provide fair housing support services for 50 persons annually during each year of the planning period (Program 5-A)

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
						- Assist 30 households during the planning period (Program 5-B) - Prepare anti-displacement strategy by end of Q4 2025, being implementation in Q1 2026; minimize or prevent displacement of at-risk residents (Program 3-H) - Beginning in Q4 2024; protection of existing housing (Program 6-D)