

# Appendix E

## Fifth Cycle Housing Element Accomplishments



# Appendix – E Fifth Cycle Housing Element Accomplishments

This Appendix details the City of Turlock’s achievements in implementing the goals, policies, and programs from the 2015–2023 Housing Element. The City made significant progress in addressing housing needs through the development of new units, including units affordable to lower-income and special needs households. A summary of accomplishments by goal and a complete review of the City’s progress in implementing 2015–2023 policies and programs is provided in Table E-1.

## E.I Effectiveness of Programs for Special Housing Needs

Special needs populations include farmworkers, large families, female-headed single parent households, people experiencing homelessness, persons with disabilities, seniors, households with extremely low incomes. As shown in greater detail in Table E-1, the City made a diligent, consistent effort to achieve its housing goals that address special housing needs through the implementation of policies and programs from the 2015–2023 Housing Element. Following is a summary of the ~~effectiveness of programs for~~ key 5<sup>th</sup> Cycle accomplishments for special housing needs groups in Turlock. A program-by-program assessment of results and effectiveness is provided in Table E-1 together with a determination on whether to carry forward, modify, or discontinue each program.

- In 2018 and 2019, the City received 1.6 million in Affordable Housing and Sustainable Communities (AHSC) funds and additional tax credits to complete phase II of the Avena Bella Housing Project. Located on a 4.3-acre site in the southwestern part of the community, Avena Bella Phase 2 is a 61-unit affordable housing project consisting of garden-style two-, and three-bedroom apartments oriented around public and open space areas. The LEED Platinum certified project features a community center, pool and computer lab with after-school support for youth. Avena Bella was awarded esteemed Vanguard Award for New Construction from the National Affordable Housing Management Association.
- In 2017, The Vista, a purpose-built student residential complex with 660 beds and 180 units located directly across the street from the California State University, Stanislaus (CSUS) campus, was completed. Floor plans include studio, two-, three-, and four-bedrooms with a private bathroom for every bedroom. The housing community is situated on three parcels totaling approximately 9.7 acres with three four-story buildings including a 6,460-square-foot club house that features outside volleyball and basketball courts, and a swimming pool.
- The First-Time Home Buyer (FTHB) program has been in place for 20 years and there are 100 active loans currently in the portfolio. The City provided downpayment funding assistance for a total of 24 families between 2018 to 2021. In 2024, 9 households were funded for homes in a ~~22-lot~~22-lot subdivision.

- Between 2018 and 2023, the City issued permits for 18 Very Low-Income units and 279 Low-Income units.
- In 2018, the City continued with discussions for the development or acquisitions of units or receipts of additional vouchers. In 2019, Stanislaus Housing Authority awarded State funds to build 8 affordable mental health units and 2 separate sites. In 2020, Stanislaus Housing Authority awarded State funds for the construction of permanent supportive affordable housing projects. The City has provided rental assistance for eligible units through vouchers since 2022.
- During the planning period, the City adopted a new ADU ordinance to make it easier to permit ADUs and to clarify the standards for ADUs. Since 2018, the City has issued 47 building permits for the construction of ADUs in Turlock.
- Since 2018, the City has provided information to non-profit agencies and housing developers information regarding program and funding ~~availability, and availability and~~ has continued to participate as an active member in the Turlock Community Collaborative and the Stanislaus County Continuum of Care. In 2021 and 2022, the City worked with non-profit agencies to provide 2 affordable housing units to Turlock residents.
- Annual progress reports for 2018 to 2023 have monitored details of assisted affordable rental units. The Department purchased 2 single family at-risk residences for the preservation of affordable housing units in 2022 and 10 units in 2018. No units were identified between 2019 and 2021. No at-risk units were identified in 2018 and 2020, 14 rental units preserved between 2019, and 2021- 2022.
- Project Sentinel, a non-profit agency, was funded to provide Fair Housing services every year of the Fifth Cycle, with the exception of one year they did not apply. In 2018, the City conducted two English and one Spanish seminar. The next seminar/workshop was conducted only in 2021 for both landlords and tenants. In the meantime, the City continued to work with non-profits to affirmatively further fair housing.
- Since 2020, the Department has been actively working with Central Valley Opportunity Center to assist low-income renters, homeowners or disable with energy conservation methods and repairs with grants funded by TID, MID and/or PG&E.
- In 2018, City Staff initiated discussions with non-profit agencies to acquire and rehabilitate units. The City acquired properties for the purpose of creating 16 permanent supportive housing units between 2022 and 2023.
- During the 5th Cycle, the City provided \$456,090 in public service grants to fund homeless youth outreach, domestic violence housing services, homeless counseling, shelter services, emergency food programs, rental assistance, rapid rehousing services and homeless diversion programs. Of this total, \$184,000 or approximately 40 percent was used for direct shelter services which provided shelter for 2,235 individuals during the 5th cycle.

**Table E-I Housing Programs Progress Report**

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
<b>Goal 1: Increase Housing Opportunities and Accessibility</b>								
HE.I.I.I.A	The City will increase its coordination with the State HCD staff to ensure that it will be among the first jurisdictions to apply for the funding made available through a variety of federal and State funding sources.	Immediate, with funding cycles		X		The Housing Department has sought assistance as needed to address affordable housing opportunities and needs since 2019. <u>During the 5<sup>th</sup> Cycle, the City hired a grant writer and the City is currently contracting with a firm that provides information on grant opportunities.</u> Housing applied for and has received funding for PLHA administered by HCD <u>for an estimated \$1,859,124 over five years.</u>	City staff attends HCD seminars and has registered for email notifications. Ongoing coordination is beneficial.	<del>Modify, adding more specifics.</del> <u>Continue as part of Program 4-H Pursue State and federal funds in support of housing development.</u>
HE.I.I.I.B	<p>This Housing Element cycle, CDBG, HOME, CalHOME, CDBG-R, and NSP funds will be directed towards the following purposes and programs. Subsidies to housing projects that include units affordable to Extremely Low, Very Low, and Low income residents;</p> <ul style="list-style-type: none"> <li>• The First-Time Homebuyers Program;</li> <li>• The Home Rehabilitation Loan Program;</li> <li>• The Mobile Home Rent Subsidy Program;</li> <li>• Local Community Housing Development Organizations (CHDOs) for acquiring homes for rental to large families;</li> <li>• Purchase of underutilized sites and foreclosed properties by the City for future affordable housing;</li> <li>• Homeless prevention;</li> <li>• Assistance to the elderly and mobility challenged individuals; and</li> <li>• Public infrastructure improvements.</li> </ul> <p>As other funding sources become available, the City will apply for additional funding to serve the needs identified in this Element.</p>	Annual, June of Each Year		X		<p>The City of Turlock has purchased, rehabilitated and transferred affordable housing units to non-profit organizations. This has added affordable housing to the housing stock as well as built capacity for the non-profits who own and manage these properties.</p> <p>The City has continued to offer the First-Time Homebuyer program. Although some loans have been made, the current housing market and price of housing in the area has made it difficult for people to meet the qualifications of the program. The City plans to re-evaluate the program requirement and amend them as possible to make the program more successful.</p> <p>The City continues making low interest and forgivable loans to income eligible applicants for the rehabilitation of their homes. The City plans to expand this program over the next cycle through more robust public outreach and information.</p> <p>The City has continued administering the Mobile Home Rent Subsidy Program. This program is funded through the Successor</p>	Please see results column.	<p>Continue through Program 3-B using HOME and CDBG funds</p> <p>Modify FTHB program to increase participation (Program 3-D)</p> <p>Continue through Program 3-A using HOME and CDBG funds</p> <p>Continue through Program 4-F using HOME and CDBG funds</p>

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						Agency funds and will continue for those residents who have been receiving the subsidy but additional units cannot be added to this program as the funding cannot be expanded. As those receiving the subsidy leave their mobile homes those properties are removed from the program.		
I.I.2.A	Begin constructing Phase II of the Avena Bella development to add 60 one- to two-bedroom units for Extremely Low, Very Low, and Low income households. Phase II includes the addition of 20 Extremely Low, 20 Very Low, and 20 Low income housing units.	Subject to financing availability	X			In 2018 and 2019, the City received 1.6 million in AHSC funds and additional tax credits to complete phase II of the Avena Bella Housing Project. Tax credit application was submitted in 2019. Construction completed for 61 units in 2021.		Delete as program successfully completed
HE.I.I.3.A	Non-profit organizations and their projects that receive federal and/or local funding will continue to be listed in a pamphlet for the community, which describes the awards granted. The pamphlet also lists funding sources available for new projects and contact information for the organization that manages the funding source. In addition, the Community Resource Handbook, which provides a description of all of the agencies providing housing and social services in Turlock and the surrounding areas will be updated. The handbook will include a comprehensive listing of housing developments in the City that have units reserved for lower income and disabled households. The pamphlet and handbook will be available in print at City Hall, online, and in English and Spanish.	Annually	X			The City has continued to provide this information to the public. The City often gets calls from citizens looking for various types of aid and resources and the Community Resource Handbook provides that information in one place.		The City will continue to update this information annually and make it available to the public (Program 4-E)
HE.I.I.3.B	Continue to offer regularly scheduled predevelopment meetings to developers with a proposed project where developers have an opportunity to meet with various City staff representing numerous City departments (i.e. planning, building, housing, redevelopment, engineering, fire, etc.) to strategize about project design, City standards, necessary public improvements, and funding strategies. At the predevelopment meeting, educate applicants about the City's	Ongoing		X		The City has conducted more than 50 predevelopment meetings per year, with a maximum of 89 meetings in 2019.	These meetings are effective and appreciated by developers	Continue as Program 2-A

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	mechanisms for incorporating affordable housing into new development projects, such as using density bonuses or including second units. Continue offering a "pre-development tip sheet."							
HE.I.1.3.C	Provide bilingual outreach materials and/or services for housing programs and actively publicize its availability to homeowners who may be doing home rehabilitation or otherwise need assistance.	2016 (within one year of Element's Adoption)	X			Informational handouts have been created and provided to the public in English and Spanish	Continue with a focus on DACs and LMI neighborhoods	Continue as Program 3-A
HE.I.1.4.A	Use CDBG funding to assist with curb, gutter, and sidewalk improvements in designated areas. This program also helps make older areas of the city ADA compliant (e.g. installation of sidewalk ramps). Target funds towards areas where Census data reveals concentrations of Low- and Moderate-income residents.	Annually				CDBG Funding has been used to fund public service grants and to create affordable housing during this cycle. Public improvement projects were not funded during this cycle.	<del>Starting in the 1990s, the City began to establish assessment districts to fund infrastructure in new subdivisions and neighborhoods. Turlock's DACs are located in older neighborhoods where much of the development predates the establishment of assessment districts the requirements for development to install improvements such as curb gutter and sidewalk. Housing in the northern portion of the City was built when installation of improvements was a requirement of development projects so much of this area of the City has curb gutter and sidewalk. Measure A and Measure L funds are available to fund public infrastructure in the Sixth Cycle, and curb, gutter, and sidewalk improvements will be made as redevelopment of opportunity sites occurs over the planning period, including workforce housing overlay sites in DACs.</del>	<del>Continue</del> Modify to address conditions in DACs.  In the upcoming cycle Housing staff will coordinate with Municipal Services staff to fund capital projects to install public improvements with a focus on DACs and LMI areas. (See Program 3-E). <del>Separate from the Housing Element process, the City has applied for REAP funding to prepare a master plan for the future annexation of unincorporated County islands and associated public infrastructure</del>

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								<u>improvements. The master plan will identify infrastructure funding and financing strategies. Unincorporated is-land areas are in and adjacent to DACs in Turlock.</u>
HE.I.2.1.	Continue to provide eligible households with first time homebuyer down payment assistance equal to 40% of the sales price, up to \$50,000, for each qualified household. Refine the program to base loan amounts on the gap financing necessary for each applicant. Eligible households are those with household incomes below 80 percent of AMI. Households must also be able to contribute a minimum of \$3,000 to the down payment, must have good credit, and must not have owned a home in the last three years.	Ongoing		X		The FTHB program has been in place for 20 years and there are 100 active loans currently in the portfolio. The City provided downpayment funding assistance for a total of 24 families between 2018 to 2021. The City did not assist any families in 2022 and 2023. In 2024, 9 households were funded for homes in a 22-lot subdivision.	The program provides valuable assistance to prospective homebuyers in Turlock and is a priority for the community. Due to current market conditions, it is very difficult for applicants to qualify and meet the required criteria. The City plans to look at and amend the parameters of the program to potentially expand the amount of the assistance to be able increase the number of people who qualify.	Continue/modify FTHB criteria. See Program 3-D
HE.I.2.2.	Continue the Turlock Mobile Home Rent Subsidy program, which provides assistance to eligible mobile homeowners who must pay space rental amounts (to mobile home park operators) greater than 30 percent of their income. Annual certifications are required to determine continuous eligibility of qualified individuals. Rehabilitation grants or very low interest rate loans will be available to residents to make minor repairs on their homes.	Ongoing		X		The City has continued to administer this program.	This program is funded out of the RDA successor agency funds. The City will continue administering this program for the residents in the program but because of the funding source no new residents can be added to the program.	Continue to administer for current residents. See Program 4-F
HE.I.2.3	Send information via emails or letters to the BIA, the Board of Realtors and lenders that contains relevant information about new programs and/or changes to the City's existing programs or funding sources. For example, lenders would receive information about the FTHB so that they are better able to connect with new homebuyers. Post any changes to programs on the City's web site for review.	As needed		X		The City maintains information on the web-site and has handouts available.	<u>Recognizing the need to actively promote opportunities in Turlock, the City has begun hosting informational seminars for lenders and realtors.</u>	Continue. See Program 4-G. <u>Additionally, through Program I-A the City will publish and promote an inventory of sites available for housing</u>

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								<a href="#">development on its website.</a>
HE.I.3.1	Support and participate in the annual homeless census conducted by the Turlock/Modesto/Stanslaus County Continuum of Care (CoC).	Ongoing	X			The City of Turlock participates annually in the Point in Time count.		Continue as Policy 4-3
HE.I.3.2.A	Maintain compliance with SB 2: Continue to implement the City's zoning ordinance that allows year-round emergency shelters by a non-discretionary permit in a zoning overlay district that meets the requirements of Senate Bill 2, providing that the approval of the application for the emergency shelter does not result in the district-wide cap on emergency shelter beds to be exceeded, and providing that the application complies with the conditions specified in Section 9-4.205 of the Turlock Municipal Code. The district-wide cap on emergency shelter beds shall be reviewed annually by the City Council at a formal public hearing to determine whether it needs to be increased to address the City's homeless sheltering needs.	Ongoing	X	X		<del>The zoning code was updated for compliance with SB2 and to establish a requirement for annual review of the district-wide cap.</del> The City <del>has</del> conducted public meetings annually to evaluate the <del>district-wide</del> cap <del>on</del> the number of shelter beds allowed by a non-discretionary permit in the zoning overlay district. There is currently still capacity within the overlay district and therefore there has been no <del>need to take any</del> action <del>taken</del> to increase the cap.	<p>The 2025 PIT Count found 241 persons experiencing homelessness in the City of Turlock. Turlock Gospel Mission operates an 80-bed shelter while WeCare Program operates a 49-bed shelter, offering together a total of 129 beds, leaving a gap of 112 beds or 22,400 square feet of building area (at the 200 square feet per bed standard) to accommodate the unmet need of unsheltered people in Turlock.</p> <p>The sites inventory identifies 10 vacant sites within the Emergency Shelter Overlay with a total site area of 650,280 square feet. Assuming the emergency shelters are single-story shelters, building area would be about 85 percent of the site area to account for circulation. As such, there is about 552,738 square feet of building area within the inventory to accommodate the unsheltered need. This square footage is well in excess of the 22,400 square feet of building area required to accommodate the 2025 Point-in-Time Count unmet need of 112 beds.</p>	The specific objective of Program 1.3.2A regarding compliance with SB2 was accomplished; however, the need for programs and services addressing homelessness in Turlock remains and is addressed through other 6 <sup>th</sup> Cycle programs, including Program 4-H Pursue State and Federal Funds in Support of Housing Development, which 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



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								<u>homelessness.</u>
HE.I.3.2.B	Continue to permit the development and operation of supportive and transitional housing, as defined in the Turlock Municipal Code.	Ongoing; complete by 2023		X		<del>The City has provided funding to We Care for operation of a transitional housing, a 49-bed emergency shelter, and day care services in Turlock.</del>  <u>The City has continued to follow the permitting requirements for supportive and transitional housing as defined in the Turlock Municipal Code and any applicable State laws.</u>	Zoning amendments are needed to bring the code into full compliance with <u>new</u> State law.	See Program 2-J and Policy 4.2
HE.I.3.2.C	Provide financial assistance to non-profit groups and/or surrounding jurisdictions in establishing shelter for homeless individuals. Also provide assistance to homeless service providers in establishing additional short-term beds for all segments of the homeless population, including specialized groups such as the mentally ill and chronically disabled.	Annually		X		<u>During the 5th Cycle, the City provided \$456,090 in public service grants to fund homeless youth outreach, domestic violence housing services, homeless counseling, shelter services, emergency food programs, rental assistance, rapid rehousing services and homeless diversion programs. Of this total, \$184,000 or approximately 40 percent was used for direct shelter services which provided shelter for 2,235 individuals during the 5th cycle.</u>  <del>Th</del> <u>Additionally, the City of Turlock has purchased, rehabilitated and transferred affordable housing units to non-profit groups with forgivable loans. This provides housing opportunities in the community for vulnerable individual and helps prevent homelessness. It also aids</u> with capacity building for the non-profits as they collect the rents from these units which allows them to provide services.	<u>The Annual Action Plan establishes a target to assist 14 households annually. Public service grants assisted a variety of non-profit groups providing shelter and services for people experiencing homelessness in Turlock during the planning period. While the number homeless individuals and the share of the total Countywide homeless population in Turlock remained consistent during the 5th Cycle, the need remains.</u>	Continue <del>as Program 3-B</del> <u>through Program 4-E Program Homelessness and Related Services</u>
HE.I.3.3.A	Use federal funds to provide new units of supportive housing for persons with disabilities and/or to renovate housing so	2023 (end of Housing	X			In 2018, City Staff initiated discussions with non-profit agencies to acquire and	Approximately 12 percent of the Turlock population is disabled, which is	Continue to provide incentives for

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	that it is suitable for persons with disabilities.	Element Cycle)				rehabilitate units. The City acquired properties for the purpose of creating 16 permanent supportive housing units between 2022 and 2023.	comparable to countywide share. Assistance with ADA-compliant home renovations will also help seniors age in place, an important objective since older adults represent a growing demographic.	housing for the disabled (see Program 4-A), grants for ADA-compliant home renovations (Program 4-C), and services for the disabled in partnership with non-profits (Program 4-B).
HE.I.3.3.B	Consider amending the Zoning Ordinance to encourage developers to provide a certain percentage (e.g. 5%) of housing units in new master plans have Universal Design features so that they are accessible to persons with disabilities.	2017(within two years of Element's Adoption)	X			State building code has changed and now requires adaptable units.	Need remains for design features that accommodate the disabled, including seniors with disabilities. <u>The most prevalent type of disability is ambulatory difficulty, experienced by 24.4 percent of Turlock seniors.</u>	Modify and continue as Program 4-C, undertaking Code amendments to increase housing options for older adults and persons with disabilities.
HE.I.3.3.C	Support the Valley Mountain Regional Center in its mission to serve those with developmental disabilities in Stanislaus County. Disseminate information about the Center and its services, and make referrals as appropriate.			X		City provided public service grants to non-profits serving those with disabilities, including developmental disabilities.	<u>The vast majority of Turlock residents with a developmental disability (92.5 percent) live in the home of a parent/family/guardian. Further, approximately 62 percent (475 persons) of the population that has a developmental disability is under the age of 18, while the remaining 43 percent (331 persons) is over 18 years old.*</u>	Continue through Program 4-A which provides incentives for special needs housing
HE.I.3.4	Continue with the current Housing Rehabilitation Loan program, which provides low- income persons with financial assistance to improve accessibility and safety issues in their homes. Target Housing Rehabilitation Loans towards projects that address ADA compliance	Ongoing				The City has continued to provide forgivable and low interest loans to income eligible residents.	Valuable as an anti-displacement program and to help seniors age in place.	Continue with a focus on DACs and LMI areas. See Program 3-A

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HE.I.3.5	Continue to implement the City's property development regulations established in the Zoning Ordinance, which allow deviations from the setback and height requirements for the purpose of providing accommodation for disabled access to an existing structure upon approval of a Minor Administrative Approval. Make additional modifications to the Zoning Ordinance as necessary to ensure compliance with SB 520.	Ongoing; updated regulations to be adopted by 2017			X	The City amended the zoning ordinance to clarify deviations from the zoning ordinance are allowed to make reasonable accommodations for accessibility upgrades	Analysis of constraints identified additional zoning amendments that can facilitate housing for the disabled.	Continue and expand to include new amendments. See Program 2-H
HE.I.3.6.A	Assist and/or partner with non-profit agencies on developments that provide units affordable to Extremely Low, Very Low-, and Low-income households. Use a variety of funding sources to assist these agencies in the development of housing projects that meet the needs of those in the lowest income cohorts.	2023 (end of Housing Element Cycle)		X		Between 2018 and 2023, the City issued permits for 18 Very Low-Income units and 279 Low-Income units.	Results exceeded objectives. Continue	See Program 4-A
HE.I.3.6.B	Provide incentives and concessions to encourage development affordable to lower income households such as priority processing, fee deferral and modification to development standards in accordance with Section 65915 of the California Government Code (State Density Bonus Law).).	Ongoing, As needed				Between 2018 and 2023, the City issued permits for 18 Very Low-Income units and 279 Low-Income units. ✗	Effective program. Continue	See Program 4-A
HE.I.3.6.C	For housing projects greater than 10 units in size with all units affordable to Low- Very Low- and Extremely Low-Income households, target 10% of the units as affordable to Extremely Low-Income households.	Ongoing; by 2023		X		The City did not issue permits for any ELI units in the Fifth cycle given the financial feasibility challenges.	Objective remains valuable	Continue as part of Program 4-A
HE.I.3.7	Continue working with California State University Stanislaus (CSUS) to increase the supply of student housing both on and off campus. Support the university and/or private developers building rental housing for students and support mixed use and multifamily projects close to the CSUS campus.	2017 (within two years of Element's Adoption)			X	The Vista, a purpose-built student residential complex with 660 beds/180 units located directly across the street from the California State University, Stanislaus (CSUS) campus, was completed in 2017. Floor plans include studio, two-, three-, and four-bedrooms with a private bathroom for every bedroom. The housing community is situated on three parcels totaling approximately 9.7 acres with three four-story buildings including a 6,460-square-foot club house that features outside volleyball and basketball courts, and a swimming pool. x	Continue, as there are other sites near the CSU Campus being considered for student housing, which can relieve demand from the rental market in the rest of Turlock.	See Policy I-8

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HE.1.3.8	Continue to implement the City's amended zoning ordinance with regards to the definition and permitting of employee housing. Employee housing is defined pursuant to Section 17008 of the California Health and Safety Code and includes farm worker housing.	Ongoing	X	X		<u>Zoning amendments for compliance with State law were adopted during the 5<sup>th</sup> Cycle.</u> No employee housing was constructed during the Fifth Cycle in Turlock. <u>The City of Turlock continues to implement the Zoning Ordinance in accordance with Section 17008 of the California Health and Safety Code.</u>	Constraints analysis did not identify the need for further zoning amendments related to employee housing. The City continues to work with employers and developers to promote housing to meet the needs of Turlock's workforce.	<u>Delete as program successfully completed. Continue through Policy 4-4 and Program I-B Workforce Housing Overlay</u>
HE.1.4.1	Work with the Stanislaus Housing Authority and use City lobbying and grant-writing efforts to obtain more Housing Vouchers for the Housing Authority.	Ongoing		X		In 2018, the City continued with discussions for the development or acquisitions of units or receipts of additional vouchers. In 2019, Housing Authority awarded State funds to build 8 affordable mental health units and 2 separate sites. In 2020, Stanislaus Housing Authority awarded State funds for the construction of permanent supportive affordable housing projects. The City has provided rental assistance for eligible units through vouchers since 2022.		Continue through Policy 4-5 and Program 3-H
<b>Goal 2: Remove Constraints to Housing Production</b>								
HE.2.1.1.A	Continue processing Design Reviews in conjunction with General Plan Amendments, Rezones, and Planned Developments, if these actions are also necessary to approve a project.	Ongoing	X			This has been implemented and helps to expedite the entitlement process	<u>Implementation of this program limits the number of applications a developer needs to make and shortens the approval timeline by processing requests together. The City estimates that implementation has reduced the timeline by 3 months.</u>	<u>continue Delete as program successfully completed. Through Program 2-C the City will work to further streamline Design Reviews.</u>
HE.2.1.1.B	Update the review process handouts that are available at City Hall and online in order to make it easier for applicants to understand the review process.	2017 (within two years of Element's Adoption)	X			<u>This program was completed during the 5<sup>th</sup> Cycle.</u> The City continuously reviews and updates handouts and website material to make sure it is up to date.	<u>Government Code sections 65940.1 and 65913.3 have introduced new requirements for transparency in publicizing land use controls and fees and information needed to obtain post-entitlement phase permits. To comply, the City has engaged a consultant to conduct process mapping and create new handouts</u>	<u>Continue See Program 2-K</u>

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							<u>illustrating the results.</u>	
HE.2.I.2.A	<p>Work with the development community to create incentives for developers of market-rate housing to include affordable units in their residential projects, or contribute funds for the construction of affordable housing. Possibilities include:</p> <p>Providing funds from the Housing Program to offset project costs, when Low-, Very Low- and/or Extremely Low-Income units are included in a development or when density meets or exceeds 20 units per acre;</p> <p>Fast-tracking the permit process for developers who partner with non-profits to create affordable units;</p> <p>Developing a fee deferral program to developers who include a significant amount of units for Low-, Very Low- and/or Extremely Low-Income households or when the project density meets or exceeds 20 units per acre;</p> <p>Providing density bonuses to developers that incorporate a significant amount of units for Low-, Very Low- and/or Extremely Low-Income households or when the project density meets or exceeds 20 units per acre</p>	2017 (within two years of Element's Adoption)		X		<p><del>The</del> A fee deferral program <u>was created and</u> has been used to facilitate affordable projects. <u>A later phase of the Avena Bella affordable housing project made use of fee deferrals</u>, but the City did not receive applications for any mixed income projects during the Fifth Cycle. <u>No projects requested use of State Density Bonus during the 5th Cycle.</u></p> <p><u>The City has established a process for flagging and fast-tracking projects involving affordable units. This process will be documented in a new internal procedures manual the City is now preparing.</u></p>	Mixed income housing remains a valuable objective. Incentives will be retained and expanded.	Continue and expand through Programs 1-B and 4-A
HE.2.I.2.B	Encourage developers of affordable housing to participate in the Statewide Community Infrastructure Program (SCIP) that allows select public capital improvements and development impact fees to be deferred for up to 20 years. Ensure that applicants are aware of this program during pre-development meetings.	Ongoing		X		The City has promoted the availability of this program at pre-development meetings.	<u>The City has received inquiries about the SCIP in pre-development meetings.</u> Continue to highlight at pre-development meetings and include on the pre-development tip sheet.	Continue through Program 2-A
HE.2.I.2.C	Continue to implement a short-term fee deferral program for single family homes that allows for the deferral of fees until the close of escrow.	Ongoing		X		The fee deferral program has been used to facilitate affordable projects	Fee deferral program remains valuable. <u>It is actively offered and used by between 50-75 percent of single-family residential projects.</u>	<u>Continue through Program 4-A. Continue as Policy 2-4</u>

**Table E-1 Housing Programs Progress Report**

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
HE.2.1.3	Encourage developers to include second dwelling units as an integral part of their project and to plan for second dwelling units in the design of their projects. Work with developers during the pre- application process to examine how second units could be added in residential development projects. (Example: Florsheim Homes' Rose Circle subdivision included second dwelling units on seven percent of the lots in their 323-unit single-family residential development in North Turlock.)	Ongoing		X		The City adopted a new ADU ordinance to make it easier to permit ADUs and to clarify the standards for ADUs	Developers consulted through stakeholder outreach recognize the value of including ADUs in subdivision plans. Continue to promote.	Continue through Program <del>2-A1-E</del>
HE.2.1.4	Continue to implement the City's ordinance with regards to affordable housing density bonuses, stating that the criteria and procedures set forth in Section 65915 of the California Government Code shall be applied to requests for density bonuses for affordable housing.	Ongoing		X		The City has continued to implement this Ordinance	Continue to highlight at pre-development meetings and include on the pre-development tip sheet.	Continue through Program <del>2-A4-H</del>
HE.2.2.1.A	Publish the City's Housing Element and updates, Consolidated Plan, Annual Action Plan, Annual Performance Report, CAPER, and other similar documents on the City's web site.	Within one month of release of each document	X			The City continues to post these documents annually and as any amendments are made.	Continue, to promote community awareness of housing programs and strategies.	See Policy 6-4 and Program 6-A
HE.2.2.1.B	Conduct an RFP process aimed at non- profit organizations for available funding for the development of affordable housing. Hold a seminar for non-profits on the application <del>requirements, and</del> requirements and implement a broad outreach component in order to reach a wide variety of organizations, including those that provide housing for farmworkers.	Annually		X		The City has provided information to non-profit agencies and housing developers information regarding program and funding availability since 2018, and has continued to participate as an active member in the Turlock Community Collaborative and the Stanislaus County Continuum of Care. In 2021 and 2022, the City worked with non-profit agencies to provide 2 affordable housing units to Turlock residents.	Program remains valuable	Continue as Program 4-G
<b>Goal 3: Provide and Maintain an Adequate Supply of Sites for the Development of New Affordable Housing</b>								
HE.3.1.1	Maintain a Vacant Land Inventory Map on the City's website that is updated regularly.	Quarterly		X		A vacant land map is maintained by staff and is available on the website, staff provide information to potential developers to help identify opportunity sites. As properties become available the Housing Department will share information with non-profit	Continue	Continue as Program 1-A

Table E-I Housing Programs Progress Report

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
						developers for acquisition for the development of affordable development (2021).		
HE.3.2.1.A	<p>Encourage development of well-planned and designed projects that provides for the development of compatible residential, commercial, industrial, institutional, or public uses within a single project or neighborhood by continuing to provide incentives through the Planned Development process, such as allowing higher building intensities, reduced parking requirements, reduced set-back and yard requirements, allow for a higher building height, and greater floor area ratios in these zones. In addition, the City will work closely with the developer of these projects to expedite processing and permit procedures.</p> <p>A comprehensive update of Turlock's General Plan was adopted in 2012. The updated Land Use Element of the General Plan supports these policies by promoting compact, walkable communities and continuing the City's strategy of master planning discrete areas prior to development.</p>	Ongoing		X		The City has permitted various Planned Developments to allow for deviations from the TMC development standards to allow for new designs and layouts at various densities. For example, a medium/high density single family home was permitted with reduced setbacks and driveway standards to allow for development at greater density.	<del>The PD Zone is applied to a property after approval to codify the standards established through the process. Planned Development zoning is a flexible tool that permits a wider variety of creative and innovative designs tailored to site-specific conditions. Objective remains valuable, particularly with the creation of a workforce housing overlay to help meeting RHNA obligations.</del>	<del>Continue through Program I-B-PD process is codified and working. No need to address through programs.</del>
HE.3.2.1.B	<p>Incentivize development of mixed-use projects to maximize residential components. Use past office/residential and commercial/residential mixed-use accomplishments as examples for future projects. This program is supported by policies 2.4-g and 2.6-h in the updated General Plan, which promote mixed use development. Incentives could include:</p> <p>Updating the Capital Facility Fee program to more closely reflect the reduced contribution of walkable neighborhoods to the need for additional roadway and operational infrastructure</p> <p>FAR or residential density bonuses</p> <p>Reduced parking requirements and opportunities for shared parking</p>	Ongoing	X			<p>In 2019, the City of Turlock established allowances for mixed-use in Downtown.</p> <p>The CFF was updated to create a pedestrian priority area.</p>		

**Table E-I Housing Programs Progress Report**

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
HE.3.3.1	Maintain current inventory of available land to ensure that adequate land is available to achieve New Construction goals.	Ongoing; Updated with each Housing Element Cycle (8 years)		X		The City of Turlock has adequate land zoned to accommodate the RHNA (2019). Ongoing since 2019.	Continue	Continue through Programs 1-B and 6-B
HE.3.3.2	Continue working with Stanislaus County on developing and implementing a strategy to incorporate County islands and upgrade infrastructure. This will likely include a combination of directing shared property taxes towards constructing improvements, and drafting a minimal standards agreement for County upgrades.	2019 (within four years of Element's Adoption)		X		Stanislaus County is working on a project to utilize ARPA funding to upgrade one County island, once improvements are installed the City will pursue annexation of the island. The City will continue working with the County on other strategies to address the other County islands.	<u>Separate from the Housing Element process, the City has applied for REAP funding to prepare a master plan for the future annexation of unincorporated County islands and associated public infrastructure improvements. The master plan will identify infrastructure funding and financing strategies. If the grant application is approved, work is anticipated to begin later this year.</u> <del>XX</del>	Continue through Policy 3-5
HE.3.3.3.A	Continue to implement the minimum development density standards established for each residential zoning district and prohibit development at a lower density. Turlock requires a minimum development density in all of its residential zoning districts. Residential development below the stipulated densities is strictly prohibited.	Ongoing		X		This has continued to be implemented.	Objective remains to ensure the City will effectively navigate the non net loss provisions in State law.	Continue through Program 6-D
HE.3.3.3.B	Continue implementing the provisions of AB 2292 (Dutra) and prevent the down-zoning of a residential property without a concomitant up-zoning of a comparable property.	Ongoing		X		This has continued to be implemented	Continue. <u>The 6<sup>th</sup> Cycle Element contains a program to monitor and ensure adequate sites to meet RHNA and prevent down-zoning without commensurate up-zoning; provisions for corrective action if needed are included.</u>	See Program 6- <del>A</del> <del>D</del>
HE.3.3.4.A	Seek federal and state financial assistance to facilitate the adequate provision of necessary public improvements, such as water, sewer, storm drainage, and transportation infrastructure, to accommodate future residential growth.	Ongoing	<del>X</del>			The City <del>has</del> hired a part time grant writer <u>during the 5<sup>th</sup> Cycle position</u> to dedicate time to researching grant <del>possibilities</del> <u>opportunities</u> .	<u>The City uses master plans and fee programs to fund infrastructure and public improvements needed to support housing development. Using CFF funds, the City is constructing a sewer lift station to help facilitate residential construction in the Morgan Ranch Master Plan area. Separate from the Housing Element process, the City has applied for REAP funding to</u>	See Policy 1-6 <u>and Program 2-D</u>



Table E-I Housing Programs Progress Report

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
							<u>prepare a master plan for the future annexation of unincorporated County islands and associated public infrastructure improvements.</u> <del>Continue</del>	
HE.3.3.4.B	Adopt regulations that ensure that affordable housing is made a priority for water and sewer service, consistent with State law.	2017 (within two years of Element's Adoption)			X	The City has adequate water/sewer capacity for all planned for development.	State law requires that the Housing Element be made available to water and sewer providers to ensure adequate planning for affordable housing. <u>The 6<sup>th</sup> Cycle Element includes a new program to codify this procedure.</u>	See Policy <del>2-35-4</del> and Program <del>2-45-G</del>
HE.3.3.5	Work with Stanislaus County, agricultural stakeholders, and developers/builders of farmworker housing in Stanislaus County and greater Turlock to identify available and suitable sites within the City's Sphere of Influence for farmworker housing and grant incentives and concessions such as priority processing, fee deferral and modification to development standards in accordance with Section 65915 of the California Government Code (State Density Bonus Law) to qualifying farmworker housing developments.	Ongoing; at least annual contract	X			Program did not result in any farmworker housing during the Fifth Cycle.	Turlock does not have jurisdiction to process or permit housing in the SOI and the City's ability to achieve desired outcomes is therefore limited. Ongoing coordination with County remains valuable.	Incorporate into Policy 4-3 and continue to coordinate with County
<b>Goal 4: Preserve, Rehabilitate, and Enhance Existing Housing and Neighborhoods</b>								
HE.4.1.1	Continue to implement General Plan policies and Zoning Ordinance regulations to promote compatible land uses in existing residential neighborhoods	Ongoing		X		This has continued to be implemented	The workforce housing overlay will permit multifamily housing in proximity to commercial uses with objective standards to promote compatibility and livability for future residents.	Continue and expand. See Program 1-B
HE.4.1.2	Maintain code enforcement staffing and augment as needed and as funding permits.	Ongoing		X		The City reorganized in 2022 moving the code enforcement division under the Police Department and expanded staffing.	A review of code enforcement actions since 2021 indicates that weed abatement, debris removal, and inoperative motor vehicle abatement are the most common issues. No clear pattern of geographic concentration is evident.	Continue and expand through Program 3-C

**Table E-I Housing Programs Progress Report**

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
HE.4.1.3	Continue to identify target areas to receive grants for the preservation of existing housing stock. For programs that the City administers independently (e.g. public infrastructure improvements, foreclosed property acquisition), set goals for the amount of funds that will be directed to the targeted neighborhoods. For programs in which residents approach the City for assistance (e.g. home rehabilitation loans), partner with non- profits active in the target neighborhoods to distribute information to residents about available City programs and funding.	Ongoing		X		Department continues to identify target areas and offer grants for the preservation of housing stock.	Need remains, particularly in DACs and LMI areas of Turlock. Efforts should be conducted in both English and Spanish.	Continue and expand through Programs 3-A and 3-B
HE.4.2.1	Continue to make available and aggressively market CDBG single family housing rehabilitation funds. Specifically target seniors who have taken out reverse mortgages and no longer have disposable income to spend on life safety home repairs. Work is to be identified by the amount of equity available in the property.	Annually			X	While the numerical targets were not been achieved for any year during the Fifth Cycle, 13 single family residences were assisted with rehabilitation during the period.	Need remains and Annual Action Plan establishes new targets.	Continue with adjusted targets. See Program 3-A
HE.4.2.2	Continue to make available and aggressively market rehabilitation program to investment and multi-family owners.	Ongoing	X			The City makes information available about funding sources and potential programs	Need remains, particularly as seniors represent a growing share of the population and this program can help them age in place. Continue with geographic targeting to at risk residents and areas.	See Programs 3-A and 3-H
HE.4.3.1	Use the Housing Element update cycle and annual progress reports to monitor the status of assisted affordable rental units.	Annually	X			Annual progress reports for 2018 to 2023 have monitored details of assisted affordable rental units. The Department purchased 2 single family at-risk residences for the preservation of affordable housing units in 2022 and 10 units in 2018. No units were identified between 2019 and 2021.	Based on data from the California Housing Partnership (CHP), there are currently no units at risk of conversion before 2053 in the City of Turlock; <u>however, in comments received after the Draft Housing Element was sent to HCD, a community member indicated that the affordability end date for 104 units for families and seniors in the Villas Parkside Apartments at 381 W Hawkeye Ave is 2029, not 2053. Accordingly, a new program to pursue funding for extension of expiring covenants has been added to the Action Plan.</u>	<del>Continue monitoring through Policy 6-2</del> See Program 4-J

Table E-I Housing Programs Progress Report

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
HE.4.3.2	<p>Attempt to prevent the conversion of assisted affordable rental housing to market rate by either considering the purchase of at-risk properties, identifying and working with a qualified entity to purchase the properties, or augment the subsidies to the existing owner in order to renew the affordability covenants. Currently, the soonest any covenants are expected to expire is in 2019.</p> <p>The City's procedure for preventing conversion includes:</p> <p>Contacting assisted project managers annually;</p> <p>Responding to notices to pre-pay;</p> <p>Providing assistance as appropriate; and</p> <p>Conducting tenant education and required notifications (at one year prior and six months prior to the conversion date)</p>	As needed	X			No at-risk units were identified in 2018 and 2020, 14 rental units preserved between 2019, and 2021- 2022.	Based on data from the California Housing Partnership (CHP), there are currently no units at risk of conversion before 2053 in the City of Turlock; <u>however, in comments received after the Draft Housing Element was sent to HCD, a community member indicated that the affordability end date for 104 units for families and seniors in the Villas Parkside Apartments at 381 W Hawkeye Ave is 2029, not 2053. Accordingly, a new program to pursue funding for extension of expiring covenants has been added to the Action Plan.</u>	<del>Continue monitoring through Policy 6-2</del> <u>See Program 4-J</u>
<b>Goal 5: Provide Housing Free from Discrimination</b>								
HE.5.I.I.A	Require that all recipients of locally administered housing assistance funds acknowledge their understanding of fair housing law and affirm their commitment to the law.	Annually		X		<p>The City implements this program.</p> <p><u>The Public Service subrecipient agreements have a blurb under "Administrative Requirements" that states: The ORGANIZATION shall maintain all records required by the Federal regulations specified in 24 CFR 570.506 that are pertinent to the activities to be funded under this Agreement. Such records shall include but not limited to: Records documenting compliance with the Fair Housing and equal Opportunity component of the CDBG Program.</u></p> <p><u>Further, the City's monitoring checklist used during the fiscal year monitors for the following:</u></p> <p><u>Non-Discrimination and Actions to Further Fair Housing</u></p>	Continue	Continue through <del>Policy 5-3 and Programs 5-B and 5-6A</del>

**Table E-I Housing Programs Progress Report**

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
						<u>1. Equal Employment Opportunity: Refer to 24 CFR 570.506, 601, and 602. Note Any deficiencies.</u> <u>2. Section 3: Opportunities for Training and Employment for Local Residents-</u> <u>3. Refer to 24 CFR 570.506(g)(5) and 24 CFR 570.607(a) (affirmative action). Note any deficiencies.</u> <u>4. Fair Housing Compliance: Refer to 24 CFR 570.904 and 24 CFR 570.601(b). Note any deficiencies.</u> <u>5. Requirements for Disabled Persons: Refer to 8.6. Note any concerns.</u> <u>6. Women and Minority Business Enterprises: Refer to 24 CFR 570.506(g) and 5 CFR Part 200, affirmative steps documentation. Note any concerns.</u>		
HE.5.I.I.B	Continue participation in Project Sentinel as per the HOME Consortium Consolidated Plan. Project Sentinel disseminates fair housing information through flyers and attending educational meetings. Flyers with information are available at the library, senior centers, the Department of Vocational training, City offices, the hospital, government agencies, and in some apartment complexes. This information is published in English, Spanish and Hmong.	Ongoing				This has continued. Project Sentinel was funded to provide Fair Housing services every year of the Fifth Cycle, with the exception of one year they did not apply.	AFFH analysis indicates need remains.	Continue through Program 5-A
HE.5.I.I.C	Through Project Sentinel, provide regular workshops on the fair housing laws to educate property owners and managers and real estate professionals about race and disability discrimination and familial status protections. Project Sentinel now also provides foreclosure counseling.	Annually		X		Project Sentinel was funded to provide Fair Housing services every year of the Fifth Cycle, with the exception of one year they did not apply. In 2018, the City conducted two English and one Spanish seminar. The next seminar/workshop was conducted only in 2021 for both landlords and tenants. In the meantime, the City continued to work with non-profits to affirmatively further fair	Continue working with non-profits for the furthering of fair housing.	Continue through Program 5-A

Table E-I Housing Programs Progress Report

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
						housing.		
HE.5.2.1	Continue to provide funds when necessary to mitigate the unsettling impacts of temporary and permanent relocation during the construction or rehabilitation of any housing project that has received public funds. Qualified households can receive a grant in the amount based on HUD's requirements under the Uniform Relocation Act.	Ongoing	X	X		Tenants received temporary relocation in 2018 as required by HUD Relocation regulations.	<del>The Housing Division's Rehabilitation Policies and Procedures document documents related procedures and protocols. Staff will continue to refer to it as needed to ensure compliance with State law. Need is ongoing. Residents in three Census tracts are at risk of displacement, and senior renters on fixed incomes and other low-income households throughout Turlock are at risk of displacement if housing prices continue to rise.</del>	<del>Add new program to address displacement risk (see Program 3-H) Continue as Policy 5-5</del>
<b>Goal 6: Encourage and Engage Housing Program and Coordination</b>								
HE.6.1.1	Maintain participation in the Housing Authority to qualify City residents for Section 8— existing housing assistance administered by the Housing Authority. Provide information on the availability of Housing Authority programs to qualified residents.	Ongoing		X		Continuing cooperation and coordination with developers and providers as needed.	Continue	See Policy 4-5
HE.6.1.2	Compile a list of non-profit organizations that the City has worked with in the past to establish cooperative agreements with non-profit housing corporations as a support agency to the City. Identify additional organizations that can serve the same role and provide notice of funds available. As part of this list and extended outreach, the City shall contact developers/providers of permanent and migrant farmworker housing to ensure that these entities are also made aware of available funding.	Annually	X			The City completed this program in preparing to advertise the availability of public services grants.	Exercise remains valuable to ensure non-profit service providers are aware of opportunities in Turlock.	See Program 4-G
HE.6.2.1.A	Meet with low-wage employers in Turlock to distribute information about various city housing programs that may benefit their employees, including Mobile Home Rental	Twice a year		X		Information available through City website, flyers and directly to employers as requested. In 2019, flyers were provided at	Continue	Continue as Policy 4-4

**Table E-I Housing Programs Progress Report**

No.	City of Turlock 2015-2023 Housing Element Implementation Program	Timeline in Original Plan	Completed	In Progress	Not Completed / Deferred	Result	Evaluation	Disposition
	Assistance, FTHB, and Rehabilitation Loans.					information booths during community fairs and events throughout Stanislaus County.		
HE.6.2.I.B	Coordinate with employers to provide job training programs and hiring events, enabling residents to get and/or keep jobs, and thus keep their homes.	Subject to funding application cycles		X		This has been on-going. The City has hired an Economic Development Director who has increased these types of programs as well as programs for small businesses	Educational attainment levels and poverty are lower in DACs and LMI neighborhoods. Continued focus on workforce development is a priority	Continue and expand. See Program 5-F
<b>Goal 7: Reduce Residential Energy Consumption</b>								
HE.7.I.1	Supply energy conservation awareness brochures ("100 Ways to Go Green") in all public meeting places and online, and make available in both English and Spanish.	Ongoing			X	In 2018 and 2019, the City participated in HERO and Pace programs in addition to working with local energy providers.	Continue	See Program 3-F
HE.7.I.2.A	Inform residents doing home remodels of TID programs for energy-efficient projects, such as installation of solar panels. Discuss the opportunities when residents apply for a permit.  For participants in the Home Rehabilitation Loan program, provide information and technical support regarding available rebate and incentive programs (through TID and PG&E) for energy-efficient appliances and weatherization tools. In addition, require Energy Star electrical appliances for City-funded Home Rehabilitation projects in which appliances are replaced.	Immediate, Ongoing		X		Since 2020, the Department has been actively working with Central Valley Opportunity Center to assist low-income renters, homeowners or disabled with energy conservation methods and repairs with grants funded by TID, MID and/or PG&E.	Continue	See Program 3-F
HE.7.I.2.B	Include a discussion of available TID and PG&E programs in Predevelopment Meetings. Ensure developers are aware of TID and PG&E programs.	Ongoing		X		The City continues to do this, including programs on the pre-development tip sheet shared with developers	Continue	See Programs 2-A and 3-F
HE.7.I.2.C	Require new housing construction projects to comply with the 2012 General Plan policies related to the State's greenhouse gas emissions reduction targets, set forth in AB 32.	Ongoing		X		Staff will evaluate properties to determine where changes can occur to reduce energy consumption in all City owned and owner occupied dwellings. Items may include: dual pane windows, attic insulation, energy efficient HVAC units, low flow toilets and faucets, replacement of existing lights to LED, weather stripping and tankless or high efficiency water heaters.	With or without the program, compliance with General Plan policies is required.	Redundant. Delete.