HCD Revised Draft
City of Patterson 2023-2031
6th Cycle Housing Element
(October 3, 2025)

A
APPENDIX

HCD Revised Draft

2023-2031 6th Cycle Housing Element

City of Patterson

October 3, 2025







Prepared by

EMC Planning Group

HCD REVISED DRAFT

2023-2031
6TH CYCLE HOUSING ELEMENT
CITY OF PATTERSON

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City of Patterson
2023–2031 Housing Element

Executive Summary

The City of Patterson's 2023-2031 Housing Element provides a comprehensive framework to address housing needs, improve living conditions, and guide future housing development. It establishes key goals, policies, and actions to enhance housing opportunities and ensure alignment with state requirements. The Housing Element serves the following critical functions:

- Evaluating the city's housing conditions and assessing the needs of its residents;
- Implementing citywide goals, policies, and programs to address housing challenges; and
- Developing a strategic plan to accommodate projected housing demand over the next eight years.

The City remains committed to expanding access to safe, high-quality housing for residents across all income levels. The Housing Element outlines targeted strategies to overcome barriers to housing production, address identified shortages, and ensure equitable distribution of affordable housing. Key approaches include fostering a diverse housing stock, maximizing the potential of infill and underutilized sites, and prioritizing new housing development near transit and employment hubs. These efforts aim to advance the City's housing goals and uphold its commitment to affirmatively furthering fair housing.

For the 2023-2031 6th housing cycle, the City of Patterson has been assigned a Regional Housing Needs Allocation (RHNA) of 3,716 units, distributed across very low-, low-, moderate-, and above moderate-income categories.[1] Additionally, the City must address a shortfall of 196 lower-income units from the 5th cycle, bringing the total RHNA obligation to 3,912 units. In accordance with Government Code Section 65583, the Housing Element provides a comprehensive analysis of current and projected housing needs, evaluates constraints to development, inventories land available for residential use, and establishes targeted policies and programs to support equitable and sustainable housing development.

[1] Income limits for each category are established annually by HCD and can vary from County to County. https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2024.pdf

Chapter 1, Housing Needs Assessment, provides a detailed analysis of the demographic, economic, and housing trends that influence housing demand in the City of Patterson. The assessment identifies critical needs for family-oriented and affordable housing, senior accommodations, and housing solutions for special needs populations, including farmworkers and individuals experiencing homelessness.

Patterson's population is predominantly Hispanic/Latino, with 73 percent of households owning their homes. The median household income in 2022 was $86,031. Housing development has increased by 6 percent since 2010, while vacancy rates have declined significantly, from 15 percent in 2010 to 5 percent in 2022. The city's housing stock is significantly composed of single-family homes (90 percent), with multi-family units representing 8 percent of total housing. Median home prices have significantly increased by 39 percent between 2019 and 2024, from $378,520 to $528,330. This increase highlights escalating housing demand and affordability challenges, underscoring the need for targeted housing strategies.

Chapter 2, Constraints Assessment, examines potential barriers that may impact housing development in Patterson, including governmental regulations, market dynamics, environmental factors, and infrastructure limitations. The analysis identifies key obstacles that constrain housing production and affordability, such as limiting zoning ordinances, lengthy permit processes, and infrastructure capacity issues.

To address these challenges, the chapter recommends targeted strategies, including revising zoning ordinances to promote higher-density and diverse housing types, streamlining permit approval processes to reduce delays, and implementing measures to mitigate potential environmental and infrastructure constraints. These recommendations aim to facilitate more efficient and affordable housing development while ensuring compliance with local and state requirements.

Chapter 3, Housing Action Plan, outlines strategic goals to increase housing availability, preserve the existing housing stock, promote sustainability, improve affordability, and raise awareness of housing resources. The plan emphasizes actionable steps to address Patterson's housing needs and includes the following key strategies:

- Facilitating development on underutilized and vacant sites through increased residential densities and reduced height limits and parking standards in the High Density Residential, Downtown Core, and Neighborhood Commercial Zoning Districts;
- Promoting affordable housing projects near transit hubs and employment centers;
- Streamlining regulatory processes to reduce costs and expedite housing production; and
- Permitting diverse housing types in accordance with state law.

The plan establishes quantified objectives, targeting the production of 3,912 housing units across all income levels during the planning period. These objectives are supported by policies that prioritize vulnerable populations and integrate sustainable development practices, ensuring an equitable and inclusive approach to housing in Patterson.

Chapter 4, Housing Resources and Sites Inventory, identifies land available for residential development and demonstrates the City's capacity to meet housing demand. In total, 16 sites have been identified to fulfill the City's RHNA. Key resources include major projects such as the Zacharias and Baldwin Ranch South Master Plan areas and various infill sites across the city. These sites, along with pipeline projects (entitled projects) and projected accessory dwelling units (ADUs), provide a 47 percent net surplus of housing capacity beyond the City's net RHNA.

The chapter also outlines financial and administrative resources available to support these efforts, ensuring the City's readiness to accommodate future housing growth and address community needs.

Appendix A, Assessment of Fair Housing, provides a detailed analysis of segregation patterns, areas of poverty and affluence, and disparities in access to opportunities within Patterson. The document also identifies key actions to affirmatively further fair housing and promote equitable access to housing and resources.

Key actions to enhance mobility for low-income residents include expanding public transit, improving pedestrian and bike infrastructure, and providing bike parking and transit passes to increase access to employment and services. Efforts to increase affordable housing in high-opportunity areas focus on prioritizing multi-family developments in well-resourced neighborhoods, providing development concessions, density bonuses, and leveraging state and federal funding like Low-Income Housing Tax Credits (LIHTCs) to ensure affordable units are integrated with quality schools and job centers.

To preserve existing affordable housing, the City plans to implement anti-displacement measures, utilize inclusionary housing funds to maintain affordable units, and conduct regular inspections of older properties to ensure habitability. Community revitalization efforts in low-resource areas will target infrastructure improvements in neighborhoods in the northeastern and southeastern quadrants, enhancing public amenities and supporting workforce development to increase job access and economic mobility. Additionally, zoning amendments will allow for more diverse housing types and greater density.

Finally, the City will focus on addressing historical segregation through inclusionary housing requirements, capital improvement projects, and educational campaigns to raise awareness of fair housing rights. Collaborations with organizations such as the Patterson Family Resource Center, Helping Others Sleep Tonight (HOST), Naomi's House, Stanislaus Regional Housing Authority, and Project Sentinel will enhance outreach and provide support for those facing discrimination.

Data-driven tools, like the HCD AFFH Data Viewer, will be used to identify and prioritize areas in need of intervention, ensuring that all Patterson residents have equitable access to housing opportunities and resources.

Appendix B, Review of the 2015-2023 Housing Element, provides a comprehensive evaluation of the City's 5th cycle housing policies and programs, highlighting key achievements and identifying opportunities to strengthen future housing initiatives. Notable accomplishments include the successful rezoning of 13 acres to High-Density Residential; consistent updates to the City's vacant land inventory to guide development efforts; and the implementation of incentives, such as density bonuses, development concessions, and fee reductions, which supported projects like the 66-unit affordable Stonegate Village development.

The review also identified areas for enhancement, including opportunities to further promote lot consolidation by offering more tailored incentives to developers. Additionally, programs like first-time homebuyer assistance highlighted the need for expanded resources to better align with rising housing costs. Efforts to streamline zoning code updates underscore the importance of dedicated staffing to support these specialized initiatives.

Building on these insights, the 6th Cycle Housing Element incorporates targeted strategies to advance housing goals. A primary challenge in implementing the 5th cycle housing element was largely due to a lack of dedicated staffing for housing priorities. To address this, the City will hire 1.0 Full-Time Equivalent (FTE) in the Community Development Department to focus on housing issues and expand outreach to the development community. This dedicated role is expected to enhance efficiency, streamline project implementation, and foster stronger collaboration with developers to meet housing goals.

Appendix C, Public Participation, highlights the City's comprehensive outreach efforts to engage a diverse range of stakeholders through workshops, surveys, and tribal consultations. Community feedback played a pivotal role in shaping policies and programs, with a focus on affordability, accessibility, and sustainability. Key concerns raised by participants included the need to increase affordability of accessory dwelling units, address critical infrastructure challenges, and expand affordable housing options to meet the needs of all residents. This appendix will be updated continuously throughout the Housing Element update process to ensure it reflects ongoing community engagement and evolving input from stakeholders.

1.0 Housing Needs Assessment

This section analyzes demographic and housing characteristics that influence the demand for and availability of housing. The analyses form a foundation for establishing policies and programs that seek to address identified housing needs.

1.1 Population Trends and Characteristics

Housing needs are influenced by population and employment trends. This section provides a summary of the changes to the population size, age, and racial/ethnic composition of the City of Patterson. The data for this analysis was compiled primarily from the 2000, 2010, and 2020 U.S. Census, the 2016-2020 American Community Survey, the 2022 California Department of Finance (DOF), and estimates supplemented by City and regional studies.

Historical, Existing, and Forecast Growth

The City of Patterson is one of nine incorporated cities within Stanislaus County. According to the DOF estimates, Stanislaus County's population was 548,744 in 2024. The population in Stanislaus County between 2010 and 2024 increased by approximately 3 percent and has slowed considerably since 1990 (a 41 percent increase between 1990 and 2010). Table 1-1 presents Stanislaus County and surrounding counties and their respective population trends. Table 1-2 presents population growth trends in Patterson between 1990 and 2024. Since 1990, Patterson's population has increased significantly, especially between 2000 and 2010. Population growth in the city has slowed since the 2020 COVID-19 pandemic.

Table 1-1 Regional Population Trends (1990-2024)

County	1990	2000	2010	2024	Percent Change		
					1990-2000	2000-2010	2010-2024
Stanislaus	375,256	447,124	530,584	548,744	19.2%	18.7%	3.4%
Merced	179,814	205,289	258,495	287,303	14.2%	25.9%	11.1%
San Joaquin	484,371	579,160	694,293	791,408	19.6%	19.9%	14.0%

SOURCE: U.S. Census, 1990-2010; State Department of Finance Population and Housing Estimates, 2024

Table 1-2 Population Growth Trends (1990-2024), City of Patterson

Year	Population	Numerical Change	Percent Change
1990	8,626	-	-
2000	10,959	19,585	27.0%
2010	21,251	10,292	93.9%
2020	23,074	1,823	8.6%
2024	24,790	1,716	7.4%

SOURCE: U.S. Census, 1990-2010; State Department of Finance Population and Housing Estimates, 2024

Age Composition

The age profile of Patterson residents is presented in Table 1-3. As shown, young families have remained predominant in Patterson since 2000. This indicates a need for family friendly housing units that can accommodate three or more bedrooms. Similar to national trends, Patterson's population is aging, which will lead to demand for senior housing. Since 2000, the percentage of senior population (65 years and older) in the city has increased slightly (approximately 1 percent).

Table 1-3 Age Distribution (2000-2022), City of Patterson

Age Group	2000		2010		2020		2022	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Under 5 years	1,061	9.1%	1,809	9.5%	2,157	9.7%	2,172	9.2%
5 to 9 years	1,222	10.5%	1,798	9.4%	1,815	8.1%	1,687	7.1%
10 to 14 years	1,225	10.6%	1,973	10.3%	2,084	9.3%	2,200	9.3%
15 to 19 years	1,098	9.5%	1,923	10.1%	1,997	9.0%	2,329	9.8%
20 to 24 years	820	7.1%	1,151	6.0%	1,486	6.7%	1,804	7.6%
25 to 34 years	1,600	13.8%	2,477	13.0%	2,686	12.0%	2,940	12.4%
35 to 44 years	1,880	16.2%	2,869	15.0%	3,420	15.3%	3,781	16.0%
45 to 54 years	1,197	10.3%	2,526	13.2%	3,053	13.7%	2,754	11.6%
55 to 59 years	373	3.2%	685	3.6%	1,191	5.3%	1,223	5.2%
60 to 64 years	290	2.5%	558	2.9%	561	2.5%	850	3.6%
65 to 74 years	450	3.9%	745	3.9%	1,017	4.6%	960	4.1%
75 to 84 years	285	2.5%	456	2.4%	540	2.4%	619	2.6%
85 years+	105	0.9%	140	0.7%	302	1.4%	359	1.5%
65 years+	840	7%	1,341	7.0%	1,859	8.3%	1,938	8.2%
Total	11,606	100%	19,110	100%	22,309	100%	23,678	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, 2010, 2020, 2022; U.S. Census, 2000

Race and Ethnicity

The City's demographics have changed slightly in the last decade. In 2010, approximately 56 percent of Patterson's residents were Hispanic or Latino (Table 1-4), the largest proportion among all racial/ethnic groups in the city. Between 2010 and 2022, the percent of Hispanic or Latino population increased by approximately 12 percentage points. As of 2022, Hispanic or Latino and Non-Hispanic White populations comprise the largest racial/ethnic groups. This increase in the proportion of Hispanic or Latino population mirrors a countywide trend, though the proportion of Hispanic or Latino residents citywide was much higher at approximately 68 percent in 2022. Whereas, Stanislaus County's Hispanic or Latino population was approximately 49 percent.

Table 1-4 Racial and Ethnic Composition (2010-2022), City of Patterson and Stanislaus County

Ethnic Group	2010				2020				2022			
	City of Patterson		Stanislaus County		City of Patterson		Stanislaus County		City of Patterson		Stanislaus County	
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Non-Hispanic White	5,411	28.3%	245,803	48.2%	4,566	20.5%	222,962	40.8%	4,171	17.6%	212,780	38.5%
Black/African American	1,363	7.1%	13,230	2.6%	1,115	5.0%	15,869	2.9%	1,129	4.8%	14,902	2.7%
Hispanic or Latino	10,750	56.3%	206,983	40.6%	14,872	66.7%	256,424	46.9%	16,146	68.2%	268,427	48.6%
Am. Ind./ Alaska Native	73	0.4%	3,126	0.6%	1	0.0%	2,241	0.4%	1	0.0%	2,245	0.4%
Asian	759	4.0%	26,026	5.1%	1,178	5.3%	31,044	5.7%	1,032	4.4%	31,968	5.8%
Native Hawaiian and PI	468	2.4%	3,101	0.6%	149	0.7%	3,012	06%	100	0.4%	2,975	0.5%
Other	12	0.1%	696	0.1%	28	0.1%	1,164	0.2%	254	1.1%	1,782	0.3%
Two or more races	274	1.4%	10,717	2.1%	400	1.8%	13,519	2.5%	845	3.6%	16,984	3.1%
Total	19,110	100%	509,682	100%	22,309	100%	546,235	100%	23,678	100%	552,063	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, 2010, 2020, 2022; U.S. Census, 2000

1.2 Employment Trends

Housing needs are influenced by employment trends. Significant employment opportunities within the city can lead to growth in demand for housing in proximity to jobs. However, regional job growth is expected to have a greater impact. The 2021 Stanislaus County Demographic and Employment Forecast reported that Stanislaus County will continue to see population and housing growth associated with job growth in the region.

The quality and/or pay of available employment can determine the need for various housing types and prices. According to 2022 ACS Census 5-year estimates, in 2022, the two industries with the largest percentage of employed Patterson residents were Educational, Healthcare, and Social Services (20 percent) and Construction (15 percent), followed by Retail Trade (13 percent) and Manufacturing (11 percent) (Table 1-5). Together, Manufacturing, Retail Trade, and Transportation and Warehousing, and Utilities comprise 33 percent of employment in Patterson. Other industries generally represented similar shares of employed residents, all of which were less than 10 percent. Educational, Healthcare, and Social Services also had the largest proportion of employed residents in the County (21 percent). However, in the County, the second largest employment industry is Manufacturing (12 percent).

Table 1-5 Employment by Industry (2022), City of Patterson and Stanislaus County

Industry	Patterson		Stanislaus County	
	Employees	Percent	Employees	Percent
Agriculture, forestry, fishing and hunting, and mining	374	4%	12,069	5%
Construction	1,534	15%	21,016	9%
Manufacturing	1,141	11%	28,802	12%
Wholesale trade	219	2%	7,025	3%
Retail trade	1,333	13%	26,462	11%
Transportation and warehousing, and utilities	886	9%	18,288	8%
Information	84	1%	2,014	1%
Finance and insurance, and real estate and rental and leasing	187	2%	8,357	4%
Professional, scientific, and management, and administrative and waste management services	836	8%	20,291	9%
Educational services, and healthcare and social assistance	2,075	20%	50,815	21%
Arts, entertainment, and recreation, and accommodation and food services	820	8%	20,190	9%
Other services, except public administration	334	3%	11,311	5%
Public administration	342	3%	10,470	4%
Total	10,165	100%	237,110	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table DP03, 2022

Table 1-6 shows the Patterson labor force, which has increased by nearly 2,600 from 2010 to 2022. In 2021, the labor force in Patterson peaked, reaching 11,272 employed residents, the largest labor force over the decade. However, in 2022, the labor force dropped by approximately 289 employees. During this period, 2010 to 2022, the unemployment rate in Patterson dropped by nearly half from 12 percent in 2010 down to 7 percent in 2022. The trend seems to suggest that the COVID-19 pandemic had little effect on employment in Patterson.

Table 1-6 Labor Force Trends (2010-2022), City of Patterson

Year	Labor Force	Employment	Unemployment	Unemployment Rate
2010	8,388	7,357	1,003	12%
2011	9,009	7,758	1,228	14%
2012	8,889	7,651	1,222	14%
2013	9,040	7,595	1,445	16%
2014	9,289	7,857	1,432	15%
2015	9,481	8,100	1,318	14%
2016	9,979	8,541	1,382	14%
2017	10,342	9,116	1,185	11%
2018	10,299	9,256	995	10%
2019	10,492	9,513	926	9%
2020	10,827	9,850	977	9%
2021	11,272	10,461	811	7%
2022	10,983	10,165	818	7%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table DP03, 2010-2022

According to the *2022-2027 Stanislaus County Comprehensive Economic Development Strategy*, Patterson's major employers are largely comprised of warehousing, distribution and logistics, and retail industries (Table 1-7). This differs slightly from 2022 ACS Census 5-year estimates, which reports Educational Services, Healthcare, and Social Assistance as the largest industry employer (Table 1-5). This is likely the result of Patterson's quickly expanding business park, providing opportunities for retailers, fulfillment centers, and light manufacturing companies. While historically Patterson has derived its economic vitality from agriculture and food processing, it has now become home to a rapidly expanding business park, which has increased the number of distribution, logistics, and warehousing centers. As shown in Table 1-7, Amazon has become the largest employer in the city, employing 850 people. Distribution centers now employ just over 1,900 people in the city.[1]

[1] According to the Census Bureau, distribution centers are categorized as "warehousing" within the Transportation and Warehousing sector, meaning they are considered a type of warehouse for classification purposes. https://www.census.gov/naics/resources/archives/sect48-49.html

Table 1-7 Major Employers, 2022, City of Patterson

Employer	Description	Employer Size Class
Amazon Fulfillment Center	Distribution Center	850
Patterson Unified School District	School District	662
CVS Caremark	Distribution Center	484
W.W. Grainger	Distribution Center	348
WalMart	Retailer	241
City of Patterson	City Government	208
Traina Dried Fruits	Sun Dried Tomatoes/Fruits	150
Kohl's Distribution Center	Distribution Center	123
Restoration Hardware	Distribution Center	122
Luchich-Santos Farms	Apricot Farm	100
Kings Roofing	Roofing	100
Save Mart Supermarkets	Retail Grocer	94

SOURCE: Stanislaus County Comprehensive Economic Development Strategy, 2022-2027

1.3 Household Characteristics

This section describes Patterson household characteristics. The Census Bureau defines a household as all persons living in a single housing unit, whether or not they are related. One person living alone is considered a household, as is a group of unrelated people living in a single housing unit.

Household Type

As shown in Table 1-8, the number of households in Patterson increased marginally by about 3 percent from 2010 to 2015. Similarly, Stanislaus County experienced a 3 percent increase in household growth during this period. However, from 2015 to 2020, the number of households in Patterson increased substantially by 9 percent, while the County saw a 3 percent increase. From 2020 to 2022, households in Patterson grew by 2 percent. The County experienced similar growth, about 1 percent.

Table 1-8 Total Households (2010-2022), City of Patterson and Stanislaus County

County	2010	2015	2020	2022	Percent Change		
					2010-2015	2015-2020	2020-2022
City of Patterson	5,496	5,680	6,214	6,345	3%	9%	2%
Stanislaus County	163,841	169,196	174,826	175,747	3%	3%	1%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table S1101, 2010-2022

Table 1-9 reports the household size distribution in Patterson for 2010 and 2022. As shown, since 2010, the number of one-person renter-occupied households has significantly increased by 133 percent, while the number of four-or-more-person renter-occupied households has significantly decreased by 43 percent. Table 1-10 reports the average household size according to tenure in Patterson for 2010 and 2022. From 2010 to 2022, the average household size of owner-occupied households increased by 19 percent, whereas that of renter-occupied households decreased by 16 percent.

Table 1-9 Household Size Distribution (2010-2022), City of Patterson

Household Size	Total Households	Percent	Renter Households	Percent	Owner Households	Percent
2010						
1 Person	951	17%	222	13%	732	20%
2 Persons	1,105	20%	238	14%	867	23%
3 Persons	802	15%	202	12%	598	16%
4+ Persons	2,638	48%	1,098	62%	1,539	41%
Total	5,496	100%	1,760	100%	3,736	100%
2022						
1 Person	889	14%	516	31%	373	8%
2 Persons	946	15%	92	5%	854	18%
3 Persons	1,197	19%	451	27%	746	16%
4+ Persons	3,313	52%	629	37%	2,684	58%
Total	6,345	100%	1,688	100%	4,657	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table S2501, 2010-2022

Table 1-10 Average Household Size by Tenure (2010-2022), City of Patterson

Household Tenure	2010	2022	Percent Change 2010-2022
Owner-Occupied Household	3.29	3.91	19%
Renter-Occupied Household	3.84	3.22	-16%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table DP04, 2010-2022

These trends indicate several demographic and housing shifts in Patterson between 2010 and 2022. The significant rise in one-person renter-occupied households (133 percent increase) suggests a growing trend of individuals living alone, possibly due to seniors preferring independent living or an influx of single professionals. Meanwhile, the significant decrease in four-or-more-person renter-

occupied households (-43 percent) indicates a reduction in larger families renting homes, possibly reflecting changes in housing affordability, availability of larger rental units, or shifts in family structures. The average household size for owner-occupied homes increased by 19 percent, suggesting more people living in owned homes, potentially due to multigenerational living arrangements or more families purchasing homes. Conversely, the average household size for renter-occupied homes decreased by 16 percent, aligning with the increase in one-person households and potentially indicating a higher number of smaller rental units or a trend towards smaller family sizes among renters. These changes highlight evolving housing patterns in Patterson, with implications for housing policy, urban planning, and community services.

The Census defines a family household as "two or more people (one related by birth, marriage, or adoption residing in the same housing unit." Table 1-11 reports household data in Patterson from 2010 to 2022. Over this period, the total number of households increased from 5,496 in 2010 to 6,345 in 2022. Family households consistently made up the majority, growing from 4,383 (80 percent) in 2010 to 5,321 (84 percent) in 2022. The number of married-couple families showed a slight fluctuation but remained a majority among family households. Notably, households with female householders increased significantly, particularly from 548 in 2010 to 817 in 2022. Families with children saw a relative decrease from 55 percent in 2010 to 51 percent in 2022. Non-family households remained relatively stable at around 16 to 20 percent of the total, with a slight decrease in householders living alone and those aged 65 or older. The average household size increased from 3.47 in 2010 to 3.73 in 2022.

Table 1-11 Households by Type (2010-2022), City of Patterson

Household	2010		2015		2020		2022	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Family Households	4,383	80%	4,546	80%	5,201	84%	5,321	84%
Married-Couple Family	3,235	59%	3,193	56%	3,845	62%	3,923	62%
Other Family, Male Householder	600	11%	407	7%	607	10%	581	9%
Other Family, Female Householder	548	10%	946	17%	749	12%	817	13%
Families with Children	2,786	55%	2,652	47%	3,275	53%	3,213	51%
Non-Family Households	1,113	20%	1,134	20%	1,013	16%	1,024	16%
Householder Living Alone	951	17%	897	16%	896	14%	889	14%
Householder 65 years+	302	6%	210	4%	310	5%	282	4%
Total Households	5,496	100%	5,680	100%	6,214	100%	6,345	100%
Average Household Size	3.47	--	3.69	--	3.59	--	3.73	--

SOURCE: U.S. Census, ACS 5-Year Estimates, Tables S1101, S2501, 2010-2022

The data indicates a trend of increasing household numbers in Patterson, with a notable rise in family households, particularly those with female householders. This suggests a shift towards more diverse family structures and potentially more single-parent households. The relative stability of non-family households and the slight decrease in householders living alone and those aged 65 or older might indicate better support or integration into family units. The increase in average household size from 3.47 to 3.73 suggests that households are becoming larger, possibly due to multigenerational living or larger family units forming over time.

Household Tenure

Tenure preferences are primarily related to household income, composition, and age of the householder. Table 1-12 presents data on owner-occupied and renter-occupied housing in Patterson and Stanislaus County from 2010 to 2022. In Patterson, the proportion of owner-occupied housing remained relatively stable, increasing slightly from 68 percent in 2010 to 73 percent in 2022. Conversely, renter-occupied housing decreased from 32 percent in 2010 to 27 percent in 2022. The total number of households in Patterson increased from 5,496 in 2010 to 6,345 in 2022. In Stanislaus County, owner-occupied housing saw a small decrease from 62 percent in 2010 to 61 percent in 2022, while renter-occupied housing marginally increased from 38 percent to 39 percent over the same period. The total number of households in the county also rose from 163,841 in 2010 to 175,747 in 2022. These trends indicate a gradual increase in homeownership in Patterson, contrasting with a slight increase in rental housing in the broader county.

Table 1-12 Occupied Units by Tenure (2010-2022), City of Patterson

	Owner-Occupied Housing		Renter-Occupied Housing		Total	
	Number	Percent	Number	Percent	Number	Percent
2010						
City of Patterson	3,736	68%	1,760	32%	5,496	100%
Stanislaus County	101,826	62%	62,015	38%	163,841	100%
2015						
City of Patterson	3,626	64%	2,054	36%	5,680	100%
Stanislaus County	95,954	57%	73,242	43%	169,196	100%
2020						
City of Patterson	4,246	68%	1,968	32%	6,214	100%
Stanislaus County	102,675	59%	72,151	41%	174,826	100%
2022						
City of Patterson	4,657	73%	1,688	27%	6,345	100%
Stanislaus County	106,359	61%	69,388	39%	175,747	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table S2501, 2010-2022

Household Income

Table 1-13 presents income distribution for owner-occupied and renter-occupied households in Patterson. Among owner-occupied households, the majority have incomes of $100,000 or more, with 24 percent earning $100,000 to $149,000 and 26 percent earning $150,000 or more. In contrast, the largest group among renter-occupied households earns less than $25,000, comprising 23 percent. The median household income is higher for owner-occupied households at $100,084 compared to $73,686 for renter-occupied households, with the overall median household income being $86,031. This data highlights a significant income disparity between owner-occupied and renter-occupied households, with a larger proportion of higher-income households owning their homes and a considerable portion of lower-income households renting.

Table 1-13 Household Income by Tenure (2022), City of Patterson

Income	Owner-Occupied Households		Renter-Occupied Households		Total	
	Number	Percent	Number	Percent	Number	Percent
<$25,000	298	6%	389	23%	687	11%
$25,000 to $49,999	760	16%	150	9%	910	14%
$50,0000 to $74,999	642	14%	408	24%	1,050	17%
$75,000 to $99,999	625	13%	308	18%	933	15%
$100,000 to $149,000	1,127	24%	281	17%	1,408	22%
$150,000 or more	1,205	26%	152	9%	1,357	21%
Total	4,657	100%	1,688	100%	6,345	100%
Median Household Income	$100,084		$73,686		$86,031	

SOURCE: U.S. Census, ACS 5-Year Estimates, Table S2503, 2022

Figure 1-1 illustrates that the proportion of households earning higher incomes (higher than $100,000 has significantly increased since 2010, while the proportion of households earning less than $75,000 has decreased.

Table 1-14 reports median household income trends in 2010, 2015, 2020, and 2022 for the City of Patterson, Stanislaus County, and the State. As shown, during this period, median household income has steadily increased in the State. However, in 2015, both Patterson and the County experienced a slight drop in median household income. The City of Patterson saw an increase in median household income from $54,187 in 2010 to $86,031 in 2022. Stanislaus County experienced a similar upward trend, with median incomes rising from $51,094 in 2010 to $74,872 in 2022. The State of California also showed significant growth, with median household incomes increasing from $60,883 in 2010 to $91,905 in 2022. Overall, all three jurisdictions experienced substantial growth in median household income over the 12-year period, with the City of Patterson showing the most notable increase.

Figure 1-1 Household Income Trends (2010-2022), City of Patterson



SOURCE: U.S. Census, ACS 5-Year Estimates, Table S2503, 2010-2022

Table 1-14 Median Household Income (2010-2022), City of Patterson

Jurisdiction	2010	2015	2020	2022
City of Patterson	$54,187	$53,542	$69,947	$86,031
Stanislaus County	$51,094	$50,125	$62,873	$74,872
State of California	$60,883	$61,818	$78,672	$91,905

SOURCE: U.S. Census, ACS 5-Year Estimates, Table S2503, 2010-2022

For the purposes of the Housing Element, the California Department of Housing and Community Development (HCD) has established five income groups based on Area Median Income (AMI). The AMI is the midpoint of a region's income distribution, meaning that half of the households in a region earn more than the median and half earn less than the median. A household's income is calculated by its gross income, which is the total income received before taxes and other payroll deductions. The five income groups established by HCD include the following:[2]

[2] State income definitions are different than federal income definitions. For federal housing programs, eligibility is established for households with incomes up to only 80 percent of the AMI. These households, under the federal definition, are considered moderate income. For housing plans that are required by federal regulations, such as the Consolidated Plan and Analysis of Impediments to Fair Housing Choice, the federal income definitions are used.

- Extremely Low Income: up to 30 percent of AMI;
- Very Low Income: 31-50 percent of AMI;
- Low Income: 51-80 percent of AMI;
- Moderate Income: 81- 120 percent AMI; and
- Above Moderate Income: >120 percent AMI.

Pursuant to state and federal regulations, the AMI refers to the median income for the Metropolitan Statistical Area. For the City of Patterson, this area refers to Stanislaus County. County median income, as published by HCD, must be used to establish income groups for the purpose of the Housing Element.

The U.S. Department of Housing and Urban Development (HUD) periodically receives "custom tabulations" of Census data from the Census Bureau that are largely not available through standard Census products. The most recent estimates are derived from the 2015-2019 ACS. This dataset, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrates the extent of housing problems and housing needs, particularly for lower income households.

According to the CHAS data presented in Table 1-15, extremely low (8 percent) and very low-income households (10 percent) represent approximately 18 percent of households in the city. An additional 16 percent were within the low-income (51-80 percent AMI) category. The majority of the city's households (65 percent) were within the moderate/above moderate-income category (greater than 80 percent AMI). The proportion of moderate/above moderate-income households in the city was greater than that for the County as a whole (65 percent in the City versus 58 percent in the County).

Table 1-15 Distribution by Income Group (2016-2020), City of Patterson and Stanislaus County

Jurisdiction	Total Households	Extremely Low-Income (0-30%)		Very Low-Income (31-50%)		Low-Income (51-80%)		Moderate-/Above Moderate-Income (80%+)	
	Units	Units	Percent	Units	%	Units	%	Units	%
City of Patterson	6,215	515	8.3%	640	10.3%	1,020	16.4%	4,040	65.0%
Stanislaus County	174,835	19,440	11.1%	21,580	12.3%	31,220	17.9%	102,595	58.7%

SOURCE: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2016-2020

NOTE: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers. Furthermore, because HUD programs do not cover households with incomes above 80 percent of the county Area Median Income (AMI), CHAS data does not provide any breakdown of income groups above 80 percent AMI.

1.4 Housing Inventory and Market Characteristics

Housing Growth

Table 1-16 reports the growth in the number of housing units from 2010 to 2020 for the City of Patterson, the City of Newman, the City of Gustine, the City of Turlock, and Stanislaus County. The City of Patterson saw its housing units increase from 6,328 in 2010 to 6,685 in 2020, reflecting a 1 percent increase from 2010 to 2015 and a more substantial 5 percent increase during the 5th Planning Cycle between 2015 to 2020. Compared to the other jurisdictions, Patterson experienced a relatively higher rate of growth, especially notable in the latter half of the decade, with the exception of Newman. While other cities and the County also saw increases in housing units, Patterson and Newman's growth rates stand out as significant within the region.

Table 1-16 Housing Unit Growth by Jurisdiction (2010-2020)

Jurisdiction	Number of Units 2010	Number of Units 2015	Number of Units 2020	Percent Change 2010-2015	Percent Change 2015-2020
City of Patterson	6,328	6,393	6,685	+1%	+5%
City of Newman	3,357	3,477	3,739	+4%	+8%
City of Gustine	2,087	2,099	2,146	+1%	+2%
City of Turlock	24,627	24,824	25,076	+0.8%	+1%
Stanislaus County	179,503	180,333	183,140	+0.5%	+2%

SOURCE: California Department of Finance Population and Housing Estimates, 2010-2020

Unit Type and Size

Table 1-17 outlines changes in housing inventory by unit type in the City of Patterson from 2010 to 2022. The total number of housing units increased from 6,439 in 2010 to 6,994 in 2022. As shown, single-family detached homes have remained the most prominent unit type since 2010. During this period, the number of single family attached homes has fluctuated, rising from 181 units (3 percent) in 2010 to 327 units (5 percent) in 2015, and then stabilizing at 186 units (3 percent) by 2022. Multi-family housing units with two to four units remained relatively stable around 2 percent, while units with five or more units increased from 274 units (4 percent) in 2010 to 442 units (6 percent) in 2022, indicating a shift towards more multi-family housing. Mobile homes or trailers remained constant at approximately 2 percent of the total housing units. Overall, the data shows modest growth in the total housing units with a trend towards a higher percentage of multi-family units over time.

Table 1-17 Housing Inventory by Unit Type (2010-2022), City of Patterson

Unit Type	2010		2015		2020		2022	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
Single-family detached	5,690	88%	5,379	90%	5,910	88%	6,081	87%
Single-family, attached	181	3%	327	5%	186	3%	186	3%
Multi-family (2-4 units)	159	2%	96	2%	157	2%	157	2%
Multi-family (5+ units)	274	4%	62	1%	304	5%	442	6%
Mobile home or trailer	135	2%	145	2%	128	2%	128	2%
Total Housing Units	6,439	100%	6,009	100%	6,685	100%	6,994	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table DP04, 2010-2015; California Department of Finance Population and Housing Estimates, 2020-2022

Table 1-18 presents data on housing unit types by tenure (owner-occupied and renter-occupied) in 2022. In the City of Patterson, single-family detached homes dominate, with 5,716 units (90.1 percent) of total occupied housing units. Of these, 4,447 units (95.5 percent) are owner-occupied, while 1,269 units (75.2 percent) are renter-occupied. Single-family attached homes account for 148 units (2.3 percent), with a small proportion being owner-occupied (3 units, 0.1 percent) and the majority being renter-occupied (145 units, 8.6 percent). Multi-family developments (2-4 units) make up 1 percent of the total, all of which are renter-occupied. Multi-family developments with five or more units constitute 3.4 percent of the total, with 34 units (0.7 percent) owner-occupied and 180 units (10.7 percent) renter-occupied. Mobile homes or trailers represent 3.2 percent of the total housing units, with 173 units (3.7 percent) owner-occupied and 33 units (2 percent) renter-occupied. In total, there are 6,345 occupied housing units in Patterson, with 4,657 (73.4 percent) being owner-occupied and 1,688 (26.6 percent) renter-occupied.

Table 1-18 Unit Type by Tenure (2022), City of Patterson

Unit Type	Owner-Occupied		Renter-Occupied		Total Occupied Housing Units	
	Units	Percent	Units	Percent	Units	Percent
Single-family detached	4,447	95.5%	1,269	75.2%	5,716	90.1%
Single-family, attached	3	0.1%	145	8.6%	148	2.3%
Multi-family (2-4 units)	0	0.0%	61	3.6%	61	1.0%
Multi-family (5+ units)	34	0.7%	180	10.7%	214	3.4%
Mobile home or trailer	173	3.7%	33	2.0%	206	3.2%
Total Housing Units	4,657	100%	1,688	100%	6,345	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table S2504, 2022

Table 1-19 reports data on housing unit sizes by tenure (owner-occupied and renter-occupied) in 2022 in Patterson. As shown, the majority of units are four or more bedroom and two-to-three-bedroom units. Specifically, two-to-three-bedroom units comprise 2,740 (43.2 percent) of total occupied housing units, with 1,993 (42.8 percent) owner-occupied and 747 (44.3 percent) renter-occupied. Units with 4 or more bedrooms account for 3,118 units (49.1 percent), with a significant majority being owner-occupied (2,651 units, 56.9 percent) and 467 units (27.7 percent) renter-occupied. Smaller unit types are less common, with 421 one-bedroom units (6.6 percent) where only three are owner-occupied (0.1 percent) and 418 are renter-occupied (24.8 percent). Studios are the least common, totaling 66 units (1.0 percent) with 10 (0.2 percent) owner-occupied and 56 (3.3 percent) renter-occupied.

Overall, the majority of housing units in Patterson are larger, with two or more bedrooms, and are primarily owner-occupied. This suggests a preference or availability for larger homes within the city, potentially indicating a community structure that favors family-sized households. The relatively low numbers of smaller units, such as studios and 1-bedroom units, which are predominantly renter-occupied, imply that there may be fewer housing options for singles or smaller households. This distribution could reflect the housing market's focus on family living or a demand for larger living spaces.

Table 1-19 Unit Size by Tenure (2022), City of Patterson

Unit Size	Owner-Occupied		Renter-Occupied		Total Occupied Housing Units	
	Units	Percent	Units	Percent	Units	Percent
Studio	10	0.2%	56	3.3%	66	1.0%
1-bedroom	3	0.1%	418	24.8%	421	6.6%
2-3 bedrooms	1,993	42.8%	747	44.3%	2,740	43.2%
4+ bedrooms	2,651	56.9%	467	27.7%	3,118	49.1%
Total	4,657	100%	1,688	100%	6,345	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, Table S2504, 2022

Vacancy Rates

A certain number of vacant units are needed to moderate housing costs, provide resident choice, and incentivize upkeep. Rental properties typically have higher vacancy rates due to greater attrition. A healthy vacancy rate, allowing sufficient choice and mobility, is 2-3 percent for ownership units and 5-6 percent for rental units.

Table 1-20 reports occupancy status in Patterson in 2010 and 2020. Between 2010 and 2022, Patterson experienced a significant increase in occupied housing units, rising from 85.4 percent to 94.8 percent of the total housing inventory. The total number of housing units grew from 6,440 to 6,694, while the vacancy rate dropped from 14.6 percent to 5.2 percent. This decrease in vacancy rates is reflected across various categories, including units for rent, for sale, and other vacant types. Overall, the data points to increased housing demand and improved occupancy stability in Patterson over the 12-year period.

Table 1-20 Occupancy Status (2010-2022), City of Patterson

Occupancy Status	2010		2022	
	Total	Percent	Total	Percent
Occupied housing units	5,497	85.4%	6,345	94.8%
Total Vacant housing units	943	14.6%	349	5.2%
For rent	167	17.7%	42	12.0%
Rented, not occupied	54	5.7%	0	0.0%
For sale only	292	31.0%	190	54.4%
Sold, not occupied	326	34.6%	60	17.2%
For seasonal, recreation, or occupation	31	3.3%	15	4.3%
For migrant workers	0	0.0%	0	0.0%
Other vacant	73	7.7%	42	12.0%
Total Housing Units	6,440	--	6,694	--
Homeowner vacancy	--	6.7%	--	3.9%
Rental vacancy	--	8.4%	--	2.4%

SOURCE: U.S. Census, ACS 5-Year Estimates, Tables B25002, B25004, 2010-2022

Housing Conditions

Age and Condition of Housing Stock

The age of a housing unit is often an indicator of housing conditions. In general, housing that is 30 years or older may exhibit a need for repairs based on the useful life of materials. Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs.

Table 1-21 reports the distribution of owner-occupied and renter-occupied housing units in Patterson in 2022 by the year built. The majority of owner-occupied homes (48.2 percent) were built between 2000 and 2009, while most renter-occupied homes (32.5 percent) date from 1980 to 1989. According to U.S. Census ACS 5-year estimates, there were no housing units built between 2020 and 2022. A significant portion of owner-occupied homes were built between 1970 and 1989, accounting

for 34.1 percent combined, while 42.4 percent of renter-occupied units were built between 1980 and 2009. Housing units built before 1960 represent a small fraction of the total, indicating that Patterson's housing stock is relatively modern, with a focus on homes built in the last 30 to 50 years. This data suggests a stable, relatively new housing stock with a higher proportion of newer homes being owner-occupied and older units more likely to be rented.

Table 1-21 Tenure by Age of Housing Stock (2022), City of Patterson

Year Built	Owner-Occupied		Renter-Occupied	
	Units	Percent	Units	Percent
Built 2020 – 2022	0	0.0%	0	0.0%
Built 2010 to 2019	256	5.5%	127	7.5%
Built 2000 to 2009	2243	48.2%	449	26.6%
Built 1990 to 1999	579	12.4%	267	15.8%
Built 1980 to 1989	1011	21.7%	548	32.5%
Built 1970 to 1979	142	3.0%	102	6.0%
Built 1960 to 1969	37	0.8%	26	1.5%
Built 1950 to 1959	99	2.1%	58	3.4%
Built 1940 to 1949	52	1.1%	12	0.7%
Built 1939 or earlier	238	5.1%	99	5.9%
Total	4,657	100%	1,688	100%

SOURCE: U.S. Census, ACS 5-Year Estimates, Tables B25002, B25004, B25036, 2010-2022

Housing is considered substandard when conditions are found to be below the minimum standard of living conditions defined in Section 1001 of the Uniform Housing Code. Households living in substandard conditions are considered to be in need of housing assistance, even if they are not seeking alternative housing arrangements, due to the threat to health and safety. In addition to structural deficiencies and standards, the lack of infrastructure and utilities often serves as an indicator for substandard conditions.

Table 1-22 reports the number of housing units in Patterson that lack plumbing facilities and/or lack complete kitchen facilities according to tenure (owner-occupied or renter-occupied). As shown, no units were reported lacking plumbing facilities. In contrast, 72 renter-occupied units were reported lacking complete kitchen facilities compared to zero owner-occupied units. However, the Census typically undercounts substandard housing conditions as it is not able to report on other more subtle housing problems, such as inadequate wiring, leaks, or inadequate or lack of heating.

Table 1-22 Units Lacking Plumbing or Complete Kitchens (2022), City of Patterson

Units	Owner-Occupied	Renter-Occupied	Total
Lacking plumbing facilities	0	0	0
Lacking complete kitchen facilities	0	72	72
Total households	6,345		

SOURCE: U.S. Census, ACS 5-Year Estimates, Tables B25049, B25053, 2022

The City's Building Department estimates that about 5 percent (approximately 350 units) of the housing stock in the city require substantial rehabilitation or replacement. The eastern and downtown areas of the city, characterized by older infrastructure and higher concentrations of lower-income households, are most in need of residential rehabilitation. These areas feature a mix of single-family homes and multi-family apartments.

Code Enforcement Activities

The City has adopted Municipal Codes specifically designed to address blight, nuisances, and maintain a clean environment for all residents. The enforcement of these codes is the responsibility of the building inspector, Chief Building Official, and the City Manager. The City's code enforcement approach emphasizes education first, providing adequate notice before issuing fines or scheduling hearings if necessary. The City strives to partner with residents and business owners to ensure a fair and unbiased enforcement program that raises public awareness of the City's Municipal Codes—such as those related to property maintenance, public nuisances, abandoned vehicles, and zoning—and to facilitate the correction of code violations as they arise. Common code violations in the city include the following:

- Building Code violations such as construction without permits (e.g., room additions, garage conversions, patio covers, re-roofs, electrical, plumbing, and mechanical improvements like water heater and HVAC installations);
- Accumulation of junk and debris visible from public areas in residential and commercial zones;
- Unpermitted businesses operating in residential neighborhoods;
- Inoperable or abandoned vehicles on private property;
- Zoning violations related to structure use, size, and location;
- Hazardous or overgrown vegetation posing fire risks;
- Vacant and unsecured properties;
- Parking violations on unapproved surfaces, such as landscaped areas; and
- Commercial tenant improvements without permits, including installing interior walls, electrical, plumbing, and mechanical improvements.

Housing Costs and Affordability

Home Prices

Table 1-23 reports the median home prices in Stanislaus County, Patterson, Newman, Ceres, Modesto, and Turlock from 2019 to 2024. Stanislaus County as a whole saw a 40 percent increase in median home values over this period, rising from $336,318 in 2019 to an estimated $473,951 in 2024. In Patterson, the median home price increased by 39 percent, from $378,520 in 2019 to $528,330 in 2024. Other cities like Newman, Ceres, Modesto, and Turlock experienced similar trends, with percentage increases ranging from 37 percent to 44 percent. This data indicates a steady and significant rise in home prices across the county, reflecting a broader trend of increasing real estate values in the region.

Table 1-23 Median Home Prices (2015-2024)

Jurisdiction	Median Home Value						Percent Change 2019-2024
	2019	2020	2021	2022	2023	2024[1]	
Stanislaus County	$336,318	$371,170	$436,441	$455,777	$462,235	$473,951	40%
Patterson	$378,520	$407,727	$495,688	$511,562	$516,463	$528,330	39%
Newman	$310,817	$342,560	$408,221	$423,489	$430,258	$442,710	42%
Ceres	$318,070	$350,785	$415,472	$438,326	$446,188	$458,151	44%
Modesto	$318,638	$353,602	$415,862	$435,525	$443,416	$454,884	42%
Turlock	$357,430	$394,676	$454,231	$474,259	$480,037	$491,701	37%

SOURCE: Zillow Home Value Index, 2019-2022
NOTE: Housing value estimates were taken from December for years 2019-2024 for single-family homes unless otherwise indicated.
1 Estimates taken for July 2024.

Average Rents

Similar to home value prices, rental prices have also increased over the last decade. This significantly affects lower-income households as they are typically majority renters. High rental prices can exacerbate housing challenges such as overcrowding and cost burden if adequate rental stock is not available to suit household needs.

Table 1-24 utilizes Zillow rental data to compare average rents in Patterson in 2023 with Fair Market Rents (FMR) as established by HUD for the Modesto, CA Metropolitan Statistical Area (MSA). For one-bedroom units, the average rent in Patterson is $1,200, which is slightly above the FMR of $1,072. Two-bedroom units in Patterson have an average rent of $1,800, which is higher than the FMR of $1,365. For three-bedroom units, the average rent is $2,600, significantly above the FMR of $1,929. Finally, four-bedroom units have an average rent of $2,848, exceeding the FMR of $2,258.

Table 1-24 Average Rent by Unit Size (2023), City of Patterson

Unit Type	Average Rents	Fair Market Rents (HUD)
Studio	-	$1,039
One bedroom	$1,200.00	$1,072
Two bedrooms	$1,800.00	$1,365
Three bedrooms	$2,600.00	$1,929
Four+ bedrooms	$2,848.00	$2,258

SOURCE: Zillow, 2023; HUD, Fair Market Rent Documentation System, 2023;
NOTE: Zillow rental value estimates were taken from June 2023 median rental price.
Fair Market Rent values are based on Modesto, CA MSA.

The data indicates that average rents in Patterson for 2023 are higher than the FMR established by HUD across all unit sizes. This suggests that rental costs in Patterson may be relatively high compared to what HUD considers affordable for the area, potentially making it more difficult for lower-income households to afford housing in Patterson without exceeding their budget. This discrepancy may also indicate a competitive rental market with demand outpacing supply, driving up rental prices beyond HUD's determined fair market levels.

Affordability Gap Analysis

The costs of homeownership and renting can be compared to a household's ability to pay to determine housing affordability in a community. Housing is considered affordable if it requires no more than 30 to 35 percent of the gross household income (depending on tenure and income level) for housing expenses.

Table 1-25, provides an overview of HUD defined state income limits for Stanislaus County and the maximum affordable prices for both rental and ownership housing across various income groups. It breaks down the income limits into four categories based on percentage of Area Median Income (AMI): extremely low (0-30 percent AMI), very low (30-50 percent AMI), low (50-80 percent AMI), and moderate (100-120 percent AMI). As of 2024, the median income for Stanislaus County was $92,600. For purposes of this Housing Element's calculation, the following assumptions were used to determine maximum affordability:

- 30 percent of gross income for rent or principal, interest, taxes, insurance, and plus utilities;
- Zero down payment;
- 6.49 percent interest rate with a 30-year fixed rate mortgage loan;
- 1.2 percent taxes; and
- $800 in annual insurance.

Table 1-25 Housing Affordability Matrix (2024), Stanislaus County

Income Group	HCD Income Limits	Maximum Affordable Price	
		Monthly Rental	Ownership
Extremely Low (0-30% AMI)			
One Person	$19,150	$479	$50,561
Two Person	$21,900	$548	$59,076
Three Person	$25,820	$646	$71,129
Four Person	$31,200	$780	$87,733
Very Low (30-50% AMI)			
One Person	$31,900	$798	$89,823
Two Person	$36,450	$911	$103,906
Three Person	$41,000	$1,025	$117,865
Four Person	$45,550	$1,139	$131,824
Low (50-80% AMI)			
One Person	$51,050	$1,276	$148,797
Two Person	$58,350	$1,459	$171,181
Three Person	$65,650	$1,641	$193,688
Four Person	$72,900	$1,823	$215,888
Moderate (100-120% AMI)			
One Person	$77,750	$1,944	$230,831
Two Person	$88,900	$2,223	$265,083
Three Person	$100,000	$2,500	$299,275
Four Person	$111,100	$2,778	$333,343

SOURCE: California Department of Housing and Community Development, State Income Limits, 2024, Stanislaus County
https://www.zillow.com/mortgage-calculator/house-affordability/
NOTES: State Income Limits use 2024 Area Median Income (AMI). Stanislaus County four-person household median income= $92,600.

As shown, a one-person household in the extremely low-income group (earning $19,150) can afford a maximum monthly rent of $479 or purchase a home valued up to $50,561. In contrast, a four-person household in the moderate-income group (earning $111,100) can afford a monthly rent of $2,778 or buy a home valued up to $333,343.

Given the high costs of homeownership, moderate- and lower-income households often struggle to purchase homes and are typically limited to rental housing options. The affordability challenges in Patterson are reflected in both the homeownership and rental markets. For lower-income households, affording rental units that are appropriately sized for their family without experiencing a cost burden—defined as spending more than 30 percent of their income on housing—is difficult. This is especially true for larger units, such as three- and four-bedroom rentals, which tend to be too expensive for moderate-income households to afford without overpayment.

In Patterson, moderate-income households may be able to rent some smaller units, like one- and two-bedroom apartments, without facing a significant cost burden. However, once the need for larger units arises, even moderate-income households may face rental prices that exceed affordable thresholds, leading to housing cost burdens.

These trends are consistent with broader regional challenges in California, where housing prices and rents often outpace income growth, particularly for lower- and moderate-income households.

1.5 Overview of Housing Needs

The following section details housing problems and severe housing problems in Patterson according to the Census Bureau Comprehensive Housing Affordability Strategy (CHAS). Disproportionate housing needs generally 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. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.[3]

Cost Burden

Housing cost burden is generally defined as households paying more than 30 percent of their gross income on housing related expenses, including rent or mortgage payments and utilities. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. High housing costs can cause households to spend a disproportionate percentage of their income on housing. This may result in payment problems, deferred maintenance or overcrowding. This section uses data from the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) published by HUD. The CHAS provides information related to households with housing problems, including cost burden, overcrowding and/or without complete kitchen facilities and plumbing systems. The most recent estimates were posted by HUD in September 2023 and were derived from the 2016-2020 American Community Survey (ACS).

Table 1-26 reports housing cost burden for households in Patterson in 2020, differentiating between lower-income households (earning less than 80 percent of the area median income) and all households. Overall, approximately 55 percent of all households experience cost burden. Among lower-income households, 1,680 households experience cost burden (paying 30 percent to 50 percent of income on housing), with 895 owner-occupied and 785 renter-occupied. Additionally, 940 lower-income households face severe cost burden (paying more than 50 percent of income on housing), with 535 owner-occupied and 405 renter-occupied. For all Patterson households, 2,350

[3] California Department of Housing and Community Development Guidance, 2021, page 39.

experience cost burden, including 1,415 owner-occupied and 935 renter-occupied, while 1,080 households have severe cost burden, with 675 owner-occupied and 405 renter-occupied. This data indicates that a significant number of households, particularly lower-income, face substantial financial strain due to housing costs, with a higher prevalence of cost burden among owner-occupied households.

Table 1-26 Housing Cost Burden by Tenure (2020), City of Patterson

Household	Cost Burden (30% to ≤50%)	Severe Cost Burden (>50%)	Total
Lower-Income Households (≤80% AMI)			
Owner-Occupied	895	535	1,430
Renter-Occupied	785	405	1,190
Total	1,680	940	2,620
All Patterson Households			
Owner-Occupied	1,415	675	2,090
Renter-Occupied	935	405	1,340
Total	2,350	1,080	3,430

SOURCE: HUD Comprehensive Housing Affordability Strategy Data, 2016-2020

Overcrowding

The U.S. Census defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens). Units with more than 1.5 persons per room are considered severely overcrowded. Overcrowding increases health and safety concerns and stresses the condition of the housing stock and infrastructure. Overcrowding is strongly related to household size (particularly for large and very-large households) and the availability of suitably sized housing. Overcrowding impacts both owners and renters; however, renters are generally more significantly impacted. While family size and tenure are critical determinants in overcrowding, household income also plays a strong role in the incidence of overcrowding. As a general rule, overcrowding levels tend to decrease as income rises, especially for renters (particularly for small and large families).

Table 1-27 reports household overcrowding by tenure in Patterson and Stanislaus County from 2010 to 2022. Overall, approximately 11.5 percent of all households in Patterson experienced overcrowding in 2022, compared to 7.6 percent in the county. Overcrowding (1.01-1.5 occupants per room) in Patterson rose slightly from 4.2 percent in 2010 to 9.3 percent in 2022, primarily due to an increase in owner-occupied overcrowding. Severely overcrowded households (1.5+ occupants per room) decreased in Patterson from 3.0 percent in 2010 to 2.2 percent in 2022, with no severely overcrowded renter-occupied households reported in 2022. In Stanislaus County, overcrowding

slightly increased from 5.0 percent in 2010 to 5.6 percent in 2022, while severe overcrowding remained relatively stable at around 1.5 percent to 2.0 percent. This data indicates a growing issue with overcrowding in Patterson, particularly among owner-occupied homes, while severe overcrowding has slightly decreased.

Table 1-27 Overcrowding by Tenure (2010-2022), City of Patterson and Stanislaus County

Jurisdiction	Overcrowded (1.01-1.5 occupants per room)			Severely Overcrowded (1.5+ occupants per room)		
	Renter	Owner	Total Households	Renter	Owner	Total Households
2010						
City of Patterson	8.2%	2.3%	4.2%	7.8%	0.7%	3.0%
Stanislaus County	8.4%	3.0%	5.0%	2.7%	0.8%	1.5%
2015						
City of Patterson	7.6%	4.1%	5.4%	2.2%	1.9%	2.0%
Stanislaus County	8.2%	3.0%	5.2%	2.5%	0.9%	1.6%
2022						
City of Patterson	8.2%	9.6%	9.3%	0.0%	3.0%	2.2%
Stanislaus County	7.9%	4.1%	5.6%	3.3%	1.1%	2.0%

SOURCE: U.S. Census, ACS 5-Year Estimates, Tables S2501, 2010-2022

Housing Growth Need (2023-2031)

The State of California determines the future housing needs for the counties that make up the Stanislaus Council of Governments (StanCOG) region. StanCOG is responsible for allocating the housing needs to each jurisdiction in its region. A local jurisdiction's share of regional housing needs is the number of additional housing units needed to accommodate the forecasted household growth, to replace expected demolitions and conversion of housing units to non-housing uses, and to achieve an optimum vacancy rate that allows for healthy functioning of the housing market. The allocation is divided into the four income categories: Very Low, Low, Moderate, and Above Moderate. The allocation is further adjusted to avoid an over-concentration of lower-income households in any one jurisdiction.

Table 1-28 reports the Regional Housing Needs Allocation (RHNA) for the City of Patterson as determined by StanCOG.

Table 1-28 Regional Housing Needs Allocation (2023-2031), City of Patterson

	Total Construction Need	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income
Number of Housing Units	3,716	523	523	724	593	1,353

SOURCE: Final Regional Housing Needs Allocation (RHNA) Plan: Stanislaus County Region, 2022
NOTE: The City's RHNA allocation for very low-income is X units; this allocation is evenly split between extremely low and very low-income groups.

1.6 Special Needs Groups

Government Code Section 65583(a)(7)) requires "An analysis of any special housing needs, such as those of the elderly, persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter…"

Special needs groups are those that may face particular challenges in obtaining adequate housing due to inherent circumstances such as age, disabilities, household size, income level, and occupation. Large families, single parent households, female-headed households, or extremely low- and low-income households, and homeless persons are classified as special needs groups.

Extremely Low-Income

Extremely low-income (ELI) households are those that earn less than 30 percent of the median family income (MFI). Very low-income households are those that earn 50 percent of less of the MFI. Extremely low-income households typically face a combination of housing challenges related to income status, family size/type, disability status, access to housing opportunities, and other household characteristics. Additionally, extremely low-income households are more likely to experience overcrowding, cost burden, and substandard housing conditions. Extremely low-income households are typically minimum-wage workers, disabled persons, farmworkers, and seniors on fixed incomes.

Table 1-29 reports data on extremely low-income households in Patterson. Out of 6,215 total occupied units, 515 households (8.3 percent) fall into the extremely low-income category, earning zero to 30 percent of the HUD Area Median Family Income (HAMFI). The majority of extremely low-income households (375, or 6 percent) are renters, while 140 (2.3 percent) are owners. A significant portion of these households are severely cost-burdened, with 355 extremely low-income households (5.7 percent) paying more than 50 percent of their income on housing. Additionally, 440 extremely low-income households (7.1 percent) experience at least one of four major housing problems (incomplete kitchen/plumbing, overcrowding, or high housing costs). Overall, this data highlights the financial challenges faced by extremely low-income residents in Patterson, particularly renters, who are disproportionately affected by severe cost burdens and housing problems.

Table 1-29 Extremely Low-Income Households (2016-2020), City of Patterson

Households	Number	Percentage of Total Households
Total occupied units (households)	6,215	100%
Total Lower-income (0-80% of HAMFI) households	2,175	35.0%
Extremely Low-income (0-30% of HAMFI) households	515	8.3%
Extremely Low-income renters	375	6.0%
Extremely Low-income owners	140	2.3%
Lower-income households paying more than 50%	945	15.2%
Extremely Low-income paying more than 50%	355	5.7%
ELI Renter HH severely cost burdened	225	3.6%
ELI Owner HH severely cost burdened	130	2.1%
Lower-income households paying more than 30%	1,690	27.2%
Extremely Low-income paying more than 30%	410	6.6%
ELI Renter HH moderately cost burdened	270	4.3%
ELI Owner HH moderately cost burdened	140	2.3%
Lower-income households experiencing 1 of 4 Housing Problems	1,845	29.7%
Extremely Low-income experiencing 1 of 4 Housing Problems	440	7.1%
ELI Renter HH experiencing 1 of 4 Housing Problems	300	4.8%
ELI Owner HH experiencing 1 of 4 Housing Problems	140	2.3%

SOURCE: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2016-2020.
NOTE: MFI = HUD Median Family Income, this is the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. MFI will not necessary be the same as other calculations of median incomes (such as Census number), due to a series of adjustments that are made.
The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.
***Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

Data for overcrowding by income level is not available for Patterson. However, because both renter and owner-occupied households in Patterson experience overcrowding (9.3 percent of all households, Table 1-27) it is a likely assumption that extremely low-income households experience overcrowding.

The projected RHNA for extremely low-income households was based on the assumption that 50 percent of very low-income households qualify as extremely low-income households.[4] The very low-income housing need for Patterson is 1,046 housing units, of which the City estimates 523 housing units will accommodate the extremely low-income housing need.

[4] https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/extremely-low-income-housing-needs

Resources Available

Extremely low-income households can benefit from non-traditional housing types that offer supportive services and/or low costs, such as transitional and supportive housing, low-barrier housing, single-room occupancies (SROs), accessory dwelling units (ADUs), and, in urgent situations, emergency shelters.

As discussed in Section 1.7, Publicly Assisted Housing, Patterson has five state and federally subsidized multi-family housing developments that collectively provide 254 deed-restricted affordable units. The California Housing Partnership did not identify any of these developments at-risk of converting to market rate in the next 10 years. These developments are primarily located in the eastern quadrants of the city, near public services and transit stops.

To ensure that appropriate housing types are permitted in Patterson to meet the needs of extremely low-income households, the City has included several programs that propose amendments to the Zoning Code (Programs 1.4 – 1.6 and 4.4 – 4.12 see Chapter 3). Once implemented, these amendments will remove governmental constraints to the development of transitional and supportive housing, low-barrier navigation centers, single room occupancies, ADUs and emergency shelters.

In addition to the City's efforts to facilitate the development of affordable housing in Patterson, the following local and regional service providers and programs are available to assist extremely low-income households:

- HOST House;
- Patterson Family Resource Center;
- Housing Choice Voucher Program;
- Stanislaus Regional Housing Authority;
- Stanislaus Homeless Alliance (SHA);
- Stanislaus County Affordable Housing Corporation;
- First-Time Homebuyer Assistance; and
- Stanislaus County Regional Transit (StaRT) Dial-A-Ride.

Seniors

Seniors (persons aged 65 and above) are gradually becoming a more substantial segment of a community's population. Americans are living longer and having fuller lives than ever before in our history and are expected to continue to do so. Elderly-headed households are vulnerable to housing problems due to limited income, prevalence of physical or mental disabilities, limited mobility, and high health care costs. The elderly, particularly those with disabilities, may face increased difficulty in finding housing accommodations.

Table 1-30 reports the number and percentage of householders aged 65 years and older in Patterson and Stanislaus County from 2010 to 2022. In Patterson, the number of senior householders increased from 783 (14.2 percent) in 2010 to 868 (13.7 percent) in 2022, indicating a slight growth in the senior population. In Stanislaus County, the senior householders grew more significantly from 31,382 (19.2 percent) in 2010 to 42,463 (24.2 percent) in 2022. This data highlights a growing trend of aging populations in both Patterson and the county, with a more pronounced increase in the county overall.

Table 1-30 Householders 65 Years and Older (2010-2022), City of Patterson and Stanislaus County

Jurisdiction	2010		2015		2022	
	Number	Percent	Number	Percent	Number	Percent
City of Patterson	783	14.2%	724	12.7%	868	13.7%
Stanislaus County	31,382	19.2%	35,927	21.2%	42,463	24.2%

SOURCE: U.S. Census ACS 5-Year Estimate, Table B25007, 2010-2022
NOTE: Percent indicates the percentage of householders aged 65 years and older out of total households.

Table 1-31 reports data on householders by tenure (owner-occupied and renter-occupied) and age in Patterson from 2010 to 2022. During this time frame, householders aged 65 and older showed significant growth. In 2010, those aged 65-74 made up 7.5 percent of owner-occupied and 0.7 percent of renter-occupied households, increasing to 6.4 percent and 1.5 percent respectively in 2022. Householders aged 75 and older in owner-occupied units grew from 4.9 percent in 2010 to 6 percent in 2022, while renter-occupied units increased from 1.2 percent to 1.5 percent. Overall, the data indicates a trend towards an aging homeowner population, while the renter demographic remains more balanced across younger age groups.

Table 1-31 Householders by Tenure and Age (2010-2022), City of Patterson

Householder Age	2010				2022			
	Owner-Occupied	Percent	Renter-Occupied	Percent	Owner-Occupied	Percent	Renter-Occupied	Percent
15 to 24 years	106	1.9%	168	3.1%	101	1.6%	76	1.2%
25-34 years	408	7.4%	388	7.1%	464	7.3%	223	3.5%
35-64 years	2,542	46.3%	1,101	20.0%	3,418	53.9%	1,195	18.8%
65-74 years	411	7.5%	38	0.7%	291	4.6%	96	1.5%
75+ years	269	4.9%	65	1.2%	383	6.0%	98	1.5%
Total	3,736	100%	1,760	100%	4,657	100%	1,688	100%

SOURCE: U.S. Census ACS 5-Year Estimate, Table B25007, 2010-2022

According to 2022 ACS 5-year estimates report that the median household income for households with a householder aged 65 years or older was $44,516.[5] This figure is lower than the citywide median household income of $100,084. Furthermore, 2022 ACS 5-year estimates report that approximately 20 percent of the senior population in Patterson were living below the poverty line.[6]

Resources Available

In Patterson, there are currently three senior living communities, Marigold Home, located at 1416 Marigold Drive, Las Palmas Senior Housing Complex, located at 1075 Las Palmas Avenue, and El Solyo Village, located at 850 2nd Street. The Marigold Home is a licensed assisted living facility for seniors that provides a maximum of six units.

Operated by the Stanislaus Regional Housing Authority, the Las Palmas Senior Housing Complex features 24 newly constructed one-bedroom apartments for seniors and disabled individuals. Conveniently located near shopping, the I-5 highway, and the future Patterson Senior Center, the apartments offer spacious designs ranging from 606 to 624 square feet, with fully equipped kitchens and central heating and air. All units are handicapped adaptable. The complex includes an onsite community center with a lounge, activity area, library, laundry room, and kitchen for senior activities and gatherings. The beautifully landscaped grounds feature a gazebo and community garden, encouraging socialization and community projects.

Eligibility requirements include being 62 years or older, near-elderly (50 to 61 years old), having an income at or below 80 percent of the area median income as defined by HUD, having one to two family members for a one-bedroom apartment, and meeting screening and selection criteria. Rents start at $669 per month, depending on income level, and Section 8 is accepted.

Phase two of the Las Palmas Senior Housing Complex is underway and will provide 16 deed-restricted, very low-income senior housing units. The Housing Authority is currently in the design phase, and these units are included in the site inventory. Additionally, there is one licensed elderly residential care facility, Patterson Care Home LLC, located at 142 Palomino Way. This facility provides care for a maximum of six people.

El Solyo Village is a senior housing community operated by The Michaels Organization, a prominent developer and manager of affordable housing across the U.S. The development offers affordable apartments for elderly or disabled residents.

As a result of these senior housing developments, many of the city's senior residents live in the central areas of the city. The City operates the Hammon Senior Center, which is centrally located to ensure equitable access for all senior residents. The City offers several classes and resources for seniors aged 50 and older, including arts and crafts, games, social events, excursions, and special

[5] U.S. Census ACS 5-Year Estimate, Table B19049, 2022
[6] U.S. Census ACS 5-Year Estimate, Table S1701, 2022

events. The Hammon Senior Center is open Monday-Friday from 8:00 am to 3:00 pm, and is where the majority of senior events, resources, and learning sessions are held. The following food distribution programs are available to seniors (50 years and older):

- Commodities Program: First Tuesday of the month from 9:30 am to 11:00 am;
- Green Bag Program: Third Wednesday of the month from 12:45 pm to 1:45 pm, providing approximately 10 pounds of fruit/vegetables and a fitness/wellness presentation;
- Westside Food Pantry: Every Thursday from 1:00 pm to 3:30 pm; and
- Lunch Congregate Meal Site: Monday through Friday from 11:30 am to 12:00 pm. This program is free for seniors aged 60 and older, and costs six dollars for adults aged 50-59.

The Hammon Senior Center also coordinates game nights, featuring activities such as bingo, billiards, Loteria, Wii Bowling, table tennis, Mahjong, and poker. Educational sessions, including basic computing, senior tech support, basic Spanish, and conversational English, are provided free of charge or at low cost. Additionally, the City offers a Low-Income Program for seniors aged 60 and older, providing discounted rates for water and garbage utility services.

To further assist senior residents obtain affordable and adequate housing, the City has included the following programs (see Chapter 3):

- Program 4.1: Reasonable Accommodation and Housing for Persons with Disabilities;
- Program 4.2: Universal Design to Encourage Housing for Seniors and Persons with Limited Mobility;
- Program 4.3: Residential Care Facilities; and
- Program 4.4: Facilitating the Development of Affordable Senior Housing – Phase 2 Las Palmas Senior Apartments.

In addition to the services provided by the city, the following regional services providers and programs are available to assist seniors:

- Stanislaus County Regional Transit (StaRT) Dial-A-Ride;
- Stanislaus County Department of Aging and Veterans Services;
    - Project Hope: provides professional Brief Counseling, volunteer Peer Counseling/support, and Friendly Visitors; and
    - Prevention & Early Intervention (PEI) services for older adults.
- Modesto Senior Citizens Services;

- Sitters of Stanislaus (SOS Elder Care);
- Habitat for Humanity Modesto; and
- Meals on Wheels (Stanislaus County).

Persons with Disabilities

Federal laws define a person with a disability as "any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment." In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and intellectual disabilities that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.

The U.S. Census Bureau classifies disabilities into the following categories:

- Hearing difficulty: Deaf or having serious difficulty hearing;
- Vision difficulty: Blind or having serious difficulty seeing, even when wearing glasses;
- Cognitive difficulty: Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions;
- Ambulatory difficulty: Having serious difficulty walking or climbing stairs;
- Self-care difficulty: Having difficulty bathing or dressing; and
- Independent living difficulty: Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping.

Table 1-32 reports disability characteristics in Patterson. According to 2022 ACS 5-year estimates, approximately 8.2 percent (1,936) of Patterson's population over 5 years of age had one or more disabilities. Within the population with a disability(s), approximately 45 percent were adults aged 18 to 64 years of age, and 51 percent were seniors (65+). Ambulatory (23 percent) and independent living (22 percent) difficulties were the most common. However, prevalence of certain disabilities varied among age groups. For example, cognitive and independent living difficulties were most prevalent among adults aged 18 to 64 years. Whereas, vision and ambulatory difficulties were most prevalent among seniors (65+).

Table 1-32 Disability Characteristics, City of Patterson

Disability by Age and Type	5 to 17 Years	18 to 64 Years	65 Years and Older	Total
Total Persons with a Disability	3.4%	44.9%	51.6%	100%
Disability Type				
Hearing Difficulty	0%	42%	58%	16.0%
Vision Difficulty	0%	31%	69%	7.3%
Cognitive Difficulty	16%*	51%	33%	19.3%
Ambulatory Difficulty	0%	41%	59%	23.1%
Self-Care Difficulty	3%*	44%	53%	11.6%
Independent Living Difficulty[1]	N/A**	51%	49%	22.4%
Total Persons with Disability	134	1,762	2,024	3,920

SOURCE: U.S. Census ACS 5-Year Estimate, Table S1810, 2022
NOTE: *Tallied for all persons under 18 years.
**Tallied only for persons 18 years and over.

Persons with Developmental Disabilities

Chapter 507, Statutes of 2010 (SB 812), which took effect January 2011, amended state housing-element law to require the analysis of people with disabilities to include an evaluation of the special housing needs of persons with developmental disabilities. Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down's Syndrome, autism, epilepsy, cerebral palsy, and mild to severe mental retardation. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 2 percent. This equates to approximately 485 persons in Patterson, based on the 2022 DOF population estimates.[7]

The latest data from the California Department of Developmental Services (December 2021) indicates that 308 individuals in Patterson have a developmental disability. Of these, 195 are aged zero to 17, and 113 are 18 or older. Data on Patterson residents with developmental disabilities by residency type indicates that the majority (289) reside with a parent, family member, or guardian. Fewer than 11 individuals live in independent or supported living arrangements, community care facilities, or foster/family homes, while none reside in intermediate care facilities (California Department of Developmental Services 2021).

[7] https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2024-with-2020-census-benchmark/

Resources Available

Special housing needs for persons with disabilities fall into two general categories: physical design to address mobility impairments and in-home social, educational, and medical support to address developmental and mental impairments. The California Department of Social Services, Community Care Licensing Division reports that in Patterson, there are four State-licensed residential care facilities for adults and one for the elderly. The service organization listed in the "Seniors" section above includes several resources that accommodate seniors with disabilities.

The City's Municipal Code establishes procedures for persons with disabilities seeking equal access to housing, including reasonable accommodation for persons with disabilities. Additionally, the City follows the requirements of California Building Code Title 24, which establishes provisions for accessible building design. To further ensure adequate housing is available for persons with disabilities, the City has included Program 4.2, which proposes the adoption of a Universal Design Ordinance to include design elements that assist persons with disabilities or limited mobility (see Chapter 3). These design elements would address, limited lifting (e.g. roll-in showers and grab bars), limited mobility (e.g. push/pull lever faucets, wide swing hinges) and limited vision (e.g. additional stairwell and task lighting) pursuant to Health and Safety Code section 17959.

In addition to the efforts described above, the City has identified the following regional service providers and programs to assist residents that are living with disabilities:

- Stanislaus County Family Caregiver Support Program;
- Stanislaus County BRIDGES Volunteer Driver Program;
- Stanislaus County Health Services Agency;
- Stanislaus County Department of Mental Health;
- Disability Resource Agency for Independent Living (DRAIL) (Modesto);
- Stanislaus County Regional Transit (StaRT) Dial-A-Ride; and
- Right At Home (Modesto).

Large Households

Large households are defined as those with five or more members. These households are usually families with two or more children or families with extended family members such as in-laws or grandparents. It can also include multiple families living in one housing unit in order to save on housing costs. Large households are a special needs group because the availability of adequately sized, affordable housing units is often limited. To save for necessities such as food, clothing, and medical care, lower- and moderate-income large households may reside in smaller units, resulting in overcrowding.

Table 1-33 reports detailed information on large households (five or more persons) in Patterson in 2022, differentiated by tenure (owner-occupied and renter-occupied units). Out of the total 6,345

households in the city, 1,644 are considered large households, representing 26 percent of the total households. Among these, owner-occupied large households (1,311 households) significantly outnumber renter-occupied large households (333 households). Six person households are the most common among owner-occupied households, whereas, five person households are the most common among renter-occupied households. Overall, large households represent 26 percent of all households, with a higher percentage (28 percent) among owner-occupied units compared to renter-occupied units (20 percent). This data highlights a trend where larger households are more likely to own their homes rather than rent.

Table 1-33 Large Households by Tenure (2022), City of Patterson

Number of Persons in Unit	Owner-Occupied	Renter-Occupied	Total
Five Persons	433	227	660
Six Persons	645	63	708
Seven or More Persons	233	43	276
Total Large Households	1,311	333	1,644
Total Households	4,657	1,688	6,345
Percent of Total Households	28%	20%	26%

SOURCE: U.S. Census ACS 5-Year Estimate, Table B25009, 2022

Table 1-34 reports the existing housing stock in Patterson by number of bedrooms. As shown, the housing stock in Patterson is primarily comprised of homes with four to seven bedrooms, with 67 percent of all units within this category, predominantly in owner-occupied homes. This aligns with the household size data, which indicates that large households are more likely to own their homes and live in larger units. Conversely, smaller rental units with fewer bedrooms primarily accommodate smaller households.

Table 1-34 Housing Stock by Number of Bedrooms (2022), City of Patterson

Number of Bedrooms in Unit	Owner-Occupied	Renter-Occupied	Total	Percent
One bedroom	10	56	66	1%
Two – Three bedrooms	24	418	442	7%
Four – Five bedrooms	1,394	609	2,003	32%
Six – Seven bedrooms	1,856	351	2,207	35%
Eight or More bedrooms	1,373	254	1,627	26%
Total Households	4,657	1,688	6,345	100%

SOURCE: U.S. Census ACS 5-Year Estimate, Table S2504, 2022

Resources Available

Large households in the City of Patterson can benefit from general programs and services for lower and moderate-income persons, including the Stanislaus County Regional Housing Authority Housing Choice Voucher program, and various community and social services provided by non-profit organizations in the region. The following regional service providers and programs are available to assist Patterson's large households:

- City of Patterson First Time Homebuyer Program: The program is designed to help make homeownership more accessible to first-time buyers in the community, providing critical support for down payments or closing costs;[8]
- Patterson Family Resource Center: Located at 1010 Las Palmas Avenue, Suite E, Patterson, CA 95363, provides essential support services for low-income families, including food assistance, utility support, health and mental health services, and access to community resources like parenting classes and employment support;[9] and
- Stanislaus Regional Housing Authority Housing Choice Voucher Program: The program helps low-income families, the elderly, and disabled individuals afford decent, safe, and sanitary housing in the private market by subsidizing a portion of their rent based on their income.[10]

To encourage the development of family friendly housing, the City has included Program 4.5, which commits the City to incentivizing developers to construct larger multi-family residential units (four or more bedrooms), as well as the development of on-site amenities that meet the needs of multi-generational households, such as usable outdoor space and computer labs (see Chapter 3).

Households with Children, Single Parent Households, and Female-Headed Households

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. Female-headed households can have lower incomes and higher living expenses and may lack the resources needed for adequate childcare or job training services, often making the search for affordable, decent, and safe housing more difficult.

Table 1-35 reports the number of households with children by type and poverty in Patterson in 2022. Households with children represented approximately 50.6 percent of all households in Patterson, totaling 3,213 households. Among these, single-parent households comprised 31.3 percent, of which 18.6 percent were female-headed and 12.6 percent were male-headed without a spouse. Regarding poverty, 7.3 percent of households with children were below the poverty line.

[8] https://www.ci.patterson.ca.us/147/First-Time-Homebuyer-Program
[9] https://www.centerforhumanservices.org/what-we-do/family-resource-centers/patterson/
[10] https://stanregionalha.org/programs/housing-choice-voucher/

Notably, single-parent households accounted for 5.5 percent of households in poverty, with only female-headed households contributing to this figure. No male-headed households without a spouse were below the poverty line. This data underscores the prevalence of households with children and highlights the economic challenges faced by single-parent families, especially those led by female-headed households.

Table 1-35 Households with Children by Type and Poverty (2022), City of Patterson

Household Type	Total	Percent of Total Households[1]	Number of Households Below Poverty	Percent of Total Households in Poverty[2]
Households with Children	3,213	50.6%	235	7.3%
Single Parent Households	1,990	31.3%	177	5.5%
Female-Headed, no spouse	1,185	18.6%	177	5.5%
Male-Headed, no spouse	805	12.6%	0	0.0%

SOURCE: U.S. Census ACS 5-Year Estimate, Table S2504, Table DP02, 2022
NOTES: 1 Based on 6,345 total households.
2 Based on total households with children.

Resources Available

Limited household income constrains the ability of single-parent households to afford adequate housing, childcare, healthcare, and other necessities. The Center for Human Services Patterson Family Resource Center provides resources and referrals to families in need and partners with CalFresh, MediCal, and CalWorks, which provide assistance ranging from government food benefits to cash assistance to meet basic family needs. They also provide education, employment and training programs to assist a family's move to self-sufficiency.

Single parent households in Patterson can also benefit from general programs and services for lower-and moderate-income persons, including the Stanislaus Regional Housing Authority Housing Choice Voucher program, and various community and social services provided by non-profit organizations in the region. The following regional service providers and programs are available to assist Patterson's single parent households:

- Patterson Head Start - Central California Child Development Services (CCCDS): Located at 456 Eureka Street, Patterson, CA 95363, this center offers Head Start programs tailored to the needs of families, including both regional and migrant services. The program focuses on school readiness and offers comprehensive services in education, health, and nutrition;[11]

[11] https://cccds.com/wp/contacts/

- Del Puerto Child Development Center: Situated at 640 M Street, Patterson, CA 95363, this center is part of the Stanislaus County Office of Education's network of Head Start, Early Head Start, and Migrant Head Start programs. The services here also include early childhood education and developmental support for children from low-income families; and
- Naomi's House: Located at 407 South 4th Street, Patterson CA 95363, this center provides 20 beds for women and children, along with weekday day programs that include lunch, shower facilities, hygiene kits, and clean clothing. Additional assistance, such as obtaining Social Security cards, driver's licenses, state IDs, Medi-Cal, CalFresh, and registering for low-income housing in Stanislaus County, is available on a case-by-case basis. The center also offers financial literacy workshops twice a week, in partnership with Oak Valley Bank, to help low-income families open checking and savings accounts. Employment support is a key focus, with the center helping residents access trade programs or pursue a GED to improve their job prospects.

Additionally, the City of Patterson offers a variety of youth programs designed to engage and support young residents.[12] These include organized youth sports such as basketball, soccer, and baseball, focusing on skill development, teamwork, and sportsmanship. For teens, the city provides programs like the Youth Action Commission (YAC), which promotes leadership and community involvement through activities like event planning and community service. Additionally, the Teen Outdoor Experience offers opportunities for teens to explore nature and learn about environmental careers, including field trips and leadership training. These programs aim to foster a sense of community, personal growth, and healthy living among Patterson's youth.

Farmworkers

Farmworkers are traditionally defined as people whose primary incomes are earned through permanent or seasonal agricultural labor. Farmworkers are generally considered to have special housing needs due to their limited income and the often unstable nature of their employment. In addition, farmworker households tend to have high rates of poverty, live disproportionately in housing that is in the poorest condition, have extremely high rates of overcrowding, and have low homeownership rates.

Estimating the number of farm workers at any given time is challenging due to high turnover, varying employment types (seasonal or permanent), and different roles (processing plant workers or field laborers). Migrant and seasonal farm workers often lack fixed addresses, work intermittently across various jobs, and have only casual ties to employers. Many reside in remote rural areas, may have limited English proficiency and educational opportunities, and are cautious about interacting with government agencies, which can make data collection more challenging. Inaccurate data hampers efforts to address their housing and service needs. Farm workers typically have the lowest family income, highest poverty rates, low educational attainment, and one of the lowest rates of health insurance coverage, with most being noncitizens.

[12] https://www.ci.patterson.ca.us/218/Recreation-Community-Services

Farmworkers in California

The University of California, Merced, published the Farmworker Health Study (FWHS)[13] in 2022, funded by the California Department of Public Health. The FWHS study surveyed 1,242 California farmworkers across five major regions, including the San Joaquin Valley, Upper Central Coast (Salinas Valley), Imperial and Coachella Valley, Sonoma/Napa Counties, and Lower Central Coast (Santa Barbara region), capturing a profile largely representative of the broader farmworker population. The sample was overwhelmingly Latino (99 percent), foreign-born (91 percent), and low-income. Unlike broader studies, FWHS over-sampled women and Indigenous workers, who often experience lower wages and greater employment precarity. Notable demographic differences included a higher proportion of females (56 percent) and Indigenous participants compared to the American Community Survey (ACS) and National Agricultural Workers Survey (NAWS) datasets, though median age, marital status, and years spent in the U.S. were comparable.

The study found that farmworker households experience significant challenges, including overcrowding and low incomes. The median household size of four exceeded the California average, with 29 percent of households accommodating six or more people. Children were prevalent, with 70 percent of respondents living in households with minors, yet only 2 percent reported children working. The median household income of $25,000 starkly contrasted with the ACS-reported $62,021, and more than half of respondents supported family members outside their households. Financial insecurity was widespread, with 62 percent struggling to pay for food or bills during the pandemic, and food insecurity rates exceeding 40 percent.

Housing conditions further compound challenges, as 92 percent of respondents were renters, predominantly in single-family homes. Farmworkers reported issues such as poor water quality, inadequate ventilation, and pest infestations, exacerbated by climate change and substandard housing. Despite being renters, only 2 percent relied on employers to subsidize housing costs, differentiating them from H-2A migrant workers.[14] These conditions underscore the vulnerability of California's farmworker population and the systemic barriers they face in securing adequate living standards and financial stability. Further, this data brings to light the gaps in data collection and reporting on special needs groups like farmworkers, providing a better understanding of farmworkers in the state.

Farmworkers in Stanislaus County

The U.S. Census of Agriculture provides data at the state and county levels. Therefore, the data presented is for Stanislaus County. Permanent workers are defined as those hired for 150 days or more and seasonal workers are defined as those that are hired for less than 150 days. According to the 2022 U.S. Census of Agriculture, there were approximately 12,064 workers (hired labor) and

[13] https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf
[14] https://www.dol.gov/agencies/eta/foreign-labor/programs/h-2a

1,918 unpaid workers in Stanislaus County. Of the 12,064 hired workers, more than half (7,384 workers, 61 percent) were employed for 150 days or more, while the other 39 percent of workers were hired for less than 150 days.[15]

Table 1-36 reports both ACS 5-year estimate farmworker data for Patterson and U.S. Census of Agriculture farmworker data for Stanislaus County in 2022. As shown, Patterson and Stanislaus County had similar rates of hired farmworkers in 2022, 4 percent and 5 percent, respectively.

Table 1-36 Farmworkers, 2022, City of Patterson and Stanislaus County

Jurisdiction	Total Number of Workers	Percent of Workers	Industry
City of Patterson	374	4%	Agriculture, forestry, fishing, hunting, and mining
Stanislaus County	12,064	5%	Agriculture, forestry, fishing, hunting, and mining

SOURCE: U.S. Census ACS 5-Year Estimate, Table DP03, 2022; U.S. Census of Agriculture, Table 7. Hired Farm Labor – Workers and Payroll, 2022
NOTE: There is a discrepancy between data reported in the ACS 5-Year Estimate data and U.S. Census of Agriculture for Stanislaus County. Table reports U.S Census of Agriculture data for Stanislaus County.

Resources Available

In Patterson, only 4 percent of the city's employment is comprised of agriculture and natural resources. Nonetheless, the City shares the responsibility for farmworker housing as farmworkers may work within 75 miles of agricultural land uses (including dairy, vineyards, and produce) and the City is within 75 miles of these uses. While HCD has no established metrics, the United States Department of Agriculture, (USDA) considers farmworkers that work at a specific location within 75 miles of their home to be "settled" and thus permanent members of their home community.

The Office of Migrant Services (OMS) oversees 24 Migrant Housing Centers across California. The Migrant Farmworker Housing Program, established by OMS, provides safe, decent, and affordable seasonal rental housing for migrant farmworker families during peak harvest season. The centers, operated under contract according to OMS Regulations, function for 180 days annually, with possible extensions subject to OMS approval.

The Stanislaus Regional Housing Authority is contracted to manage the Patterson Migrant Farmworker Housing Center, offering 40 rental units.[16] The units range in size and price from 1-bedroom ($11/day) to 4-bedroom units ($12.50/day). A security deposit of $100 is required, and all utilities are included in the rental rate. As of August 2024, the Stanislaus Regional Housing Authority reported that all 40 units were occupied, with 18 households classified as very low-income, earning at or below 50 percent of the Area Median Income (AMI), and 22 households classified as low-income, earning at or below 60 percent of the AMI.[17]

[15] U.S. Census of Agriculture, Table 7. Hired Farm Labor – Workers and Payroll, 2022
[16] https://stanregionalha.org/migrant-housing/
[17] Stanislaus Regional Housing Authority, Miriam Giebeler, email dated August 29, 2024.

The Migrant Education Program, funded under the Every Student Succeeds Act (Title I, Part C), aims to provide supplementary educational and support services to eligible migratory children and youth. The program's objective is to ensure that all migratory children meet challenging academic standards and graduate with a high school diploma or equivalent, preparing them for responsible citizenship, further learning, and productive employment. Several schools in Patterson participate in the Migrant Education Program, including West Valley Learning Center, Apricot Valley Elementary School, Grayson Elementary School, Las Palmas Elementary School, Northmead Elementary School, Walnut Grove Elementary School, Creekside Middle School, Del Puerto High School, and Patterson High School.

To encourage the development of housing types suitable for lower-income households, including farmworkers, the City will implement the following programs:

- Program 1.6: Affordable Housing Development;
- Program 1.10: Amend Residential Development Standards to Remove Barriers to Multi-family Residential Development;
- Program 4.10: Single-Room Occupancy Units (SROs);
- Program 4.11 Employee and Farmworker Housing; and
- Program 4.12: Accessory Dwelling Units.

Additionally, the City has developed Program 5.3 proposing actions to affirmatively market fair housing resources, including marketing affordable housing listings as they become available, coordinating outreach with local non-profit organizations who have direct contact with special needs groups, and incentivizing developers to construct affordable residential units (see Chapter 3).

The City of Patterson is aware of the Statewide Farmworker Housing Needs Survey that HCD launched in compliance with the requirements of AB 1654 (Rivas, Chapter 638, Statutes of 2022), and as more information becomes available regarding farmworker housing needs, the City will update the policies and programs to further accommodate the needs of farmworkers.

Persons Experiencing Homelessness

Homelessness in California is a continuing and growing crisis. Individuals and families experiencing homelessness are without permanent housing largely due to a lack of affordable housing. Homelessness is often compounded by a lack of job training and supportive services to treat mental illness, substance abuse, or domestic violence.

Table 1-37 presents the recorded homeless population in the City of Patterson and Stanislaus County from 2018 to 2024, based on the County's annual Point-in-Time Homeless Counts (PIT). During this period, Patterson's homeless population fluctuated, peaking at 78 homeless persons in 2020 before gradually declining to 61 homeless persons by 2024. In contrast, Stanislaus County saw a significant rise in its homeless population, increasing from 1,356 homeless persons in 2018 to a peak of 2,927 homeless persons in 2021. Although there was a slight decrease after 2021, the county's homeless population remained above 2,000 through 2024. The data suggests that while Patterson experienced some variability in its homeless population, Stanislaus County faced a more substantial and sustained increase, particularly around 2020 and 2021. The fluctuations in Stanislaus County's homeless population between 2020 and 2021 can likely be attributed to the economic impact of the COVID-19 pandemic and subsequent government interventions. The increase in 2020 likely resulted from job losses, reduced income, and evictions caused by the pandemic. However, the decrease in 2021 may have been due to relief measures such as eviction moratoriums, emergency rental assistance, and expanded social safety nets, as well as efforts to temporarily house homeless individuals to prevent the spread of the virus.

Table 1-37 Homeless Population (2018-2024), City of Patterson and Stanislaus County

Jurisdiction	Sheltered/Unsheltered Population						
	2018	2019	2020	2021	2022	2023	2024
City of Patterson	37	76	78	-	55	67	61
Stanislaus County	1,356	1,923	2,107	2,927	1,857	2,091	2,052

SOURCE: Stanislaus County Point-in-Time (PIT) Count, 2018-2024

Table 1-38 reports the housing inventory count in the Turlock, Modesto/Stanislaus County Continuum of Care (CoC) region. The 2023 Housing Inventory Count for Stanislaus County[18] reports a total of 2,125 year-round beds across various types of shelters and housing programs. Emergency shelters, safe havens, and transitional housing account for 1,164 of these beds, including 672 adult-only beds and 43 child-only beds. Permanent housing options provide 961 beds, with permanent supportive housing offering the majority at 480 adult-only beds. There are also 32 beds available through rapid re-housing programs. The inventory includes 214 family units and 702 family beds, catering to households with at least one adult and one child. Additionally, there are 125 seasonal beds and 25 overflow/voucher beds to accommodate varying needs. This data indicates a comprehensive approach to addressing homelessness in Stanislaus County, with a significant emphasis on both emergency and permanent supportive housing options.

[18] https://files.hudexchange.info/reports/published/CoC_HIC_CoC_CA-510-2023_CA_2023.pdf

Table 1-38 Housing Inventory Count (2023), Turlock, Modesto/Stanislaus County CoC

Type of Shelter	Family Units[1]	Family Beds[1]	Adult-Only Beds	Child-Only Beds	Total Yr-Round Beds	Seasonal	Overflow/ Voucher
Emergency, Safe Haven and Transitional Housing							
Emergency Shelter	61	211	672	43	926	125	25
Transitional	31	92	146	0	238	n/a	n/a
Subtotal	92	303	818	43	1,164	125	25
Permanent Housing							
Permanent Supportive Housing	71	225	480	0	705	n/a	n/a
Rapid Re-Housing	9	28	4	0	32	n/a	n/a
Other Permanent Housing	42	146	78	0	224	n/a	n/a
Total	122	399	562	0	961	n/a	n/a
Grand Total	214	702	1,380	43	2,125	125	25

SOURCE: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Assistance Programs, Housing Inventory County Report (2023).
NOTES: 1 Family Units and Family Beds categories include units and beds for households with one adult and at least one child under age 18.

Resources Available

According to PIT counts dating back to 2018, Patterson has had a relatively low number of persons experiencing homelessness within the city compared to the county. As a result, most resources for the homeless population are provided at the county level. However, access to transportation, public services, and resources in Patterson may present a challenge to the those experiencing homelessness, despite the limited need.

The Stanislaus Regional Transit Authority (StanRTA) operates two bus routes, Route 45, that provides service from Patterson to the cities of Newman and Turlock and Route 40, that provides service to Modesto. Additionally, the BART Commuter bus provides access to the east from Patterson to Turlock and northwest to Pleasanton BART station.[19] All bus stops and the commuter are central to the downtown area of the city. Therefore, challenges may exist for residents in need of transportation services that live in the outskirts of the city. This is a common obstacle for cities located in a more rural setting. The City Mayor and City Manager hold regular meetings with StanRTA to discuss enhancements to existing bus routes and opportunities for system expansion, aimed at supporting residential development on both the west and east sides of State Route 33.

[19] https://www.stanrta.org/101/Routes-Schedules

Local knowledge indicates that most of Patterson's homeless population is concentrated near the city's urban core in close proximity to services and public transit. Since 2012, the City of Patterson has supported Helping Others Sleep Tonight (HOST) House, a nonprofit organization dedicated to addressing homelessness in the city. The City provided HOST with a low-interest loan to purchase a house for use as transitional housing. Located at 405 South 4th Street, the HOST House opened in 2013 during the winter season when conditions were most severe. Since then, the City has continued to support HOST House, allowing it to remain open more frequently as needs have increased. In 2017, the City and HOST collaborated to offer educational classes at the facility, aimed at helping participants transform their lives by developing skills, competencies, and work habits that lead to financial self-sufficiency. By 2018, the City Council agreed to waive HOST House's monthly loan payments for every month it remains open, effectively forgiving the organization's debt. This support has enabled HOST House to provide services year-round.

The Center for Human Services operates the Patterson Family Resources Center located at 1010 W Las Palmas Avenue, Suite E in Patterson, which provides services to low-income residents of Patterson. Services provided include resource and referral; case management; counseling referral; assessment/child development training; behavioral health services; translation assistance; parent education and school readiness classes; utility assistance; and CalFresh/MediCal/CalWorks benefit applications and assistance. All services are provided at no cost. This organization helps to address the needs of lower-income and housing insecure residents in Patterson. Further, the center is located approximately 300 feet from the nearest bus stop, making it accessible by public transportation.

In addition to the resources listed above, the following regional facilities offer supportive housing services in Stanislaus County for homeless and special needs low-income persons:

- Modesto Women's Mission: 1400 East Yosemite Boulevard, Modesto;
- Children's Crisis Center – Marsha's House: Ceres;
- Stanislaus County Habitat for Humanity: 630 Kearney Avenue, Modesto;
- Hutton House: 201 Jennie Street, Modesto;
- Haven Women's Center of Stanislaus: 301 Starr Avenue, Turlock;
- We Care Program: 221 S Broadway, Turlock; and
- The Salvation Army Shelter: 320 9th Street, Modesto.

1.7 Publicly Assisted Housing

Stanislaus Regional Housing Authority

The Stanislaus Regional Housing Authority administers the Housing Choice Voucher (HCV) program for Patterson residents. According to Housing and Community Development AFFH Data Viewer 2021 data, approximately 33 Patterson households were receiving Housing Choice Vouchers.

Affordable Housing Projects

Housing developments utilizing federal, state, and/or local programs, including state and local bond programs, Low-Income Housing Tax Credits (LIHTC), density bonus, or direct assistance programs, are often restricted for use as low-income housing and provide another source of affordable housing for a jurisdiction. The City of Patterson has five state and federally subsidized housing developments that include deed-restricted affordable rental units. Together, these developments provide 254 affordable units.

Units At-Risk of Converting to Market-Rate Housing

According to California Government Code Section 65583 (a) (8), (c) (6), jurisdictions must evaluate the potential for currently rent restricted low-income housing units to convert to non-low-income housing in 10 years and propose programs to preserve or replace these units. For this Housing Element, this 10-year analysis period covers 2023 through 2033. This section identifies the city's assisted units "at-risk" of conversion to market-rate housing.

Table 1-39 reports publicly assisted affordable housing units in Patterson. As shown, there are a total of 254 deed-restricted affordable units in Patterson. Of these, none are anticipated to expire until 2048 at the earliest. The California Housing Partnership has reported a low level of risk of converting to market rate for all developments included in Table 1-39.

Preserving Existing Affordable Housing Stock

To maintain the existing affordable housing stock, the City can preserve existing affordable units and facilitate the development of new units. Depending on the circumstances of at-risk projects, different options may be used to preserve or replace the units. Preservation options to ensure the viability and ongoing supply of affordable units typically include: 1) construction of replacement units; 2) provision of rental assistance to tenants 3) transfer of the project to nonprofit ownership; and 4) purchase of affordability covenants. These options are described below.

Construction of Replacement Units

The construction of new affordable housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends on a variety of factors, including density, size of the units (i.e. square footage and number of bedrooms), location, labor, materials and land costs, and type of construction. The City is implementing a number of

programs to encourage development of new affordable units to increase the City's affordable housing stock (see Chapter 2). The City estimates the average cost of construction for replacement units to be approximately $167.00 per square foot.

Table 1-39 Publicly Assisted Affordable Housing Units (2024), City of Patterson

Development	Addresses	Affordable Units	Estimated Affordability End Year	Risk Level
Stonegate Village Phase II	625 Logan Way	71	2073	Low
Stonegate Village Phase I	625 Logan Way	65	2073	Low
Patterson Place Apartments	670 North 6th Street	39	2068	Low
El Solyo Village	850 N. 2nd Street	46	2048	Low
Patterson Farm Labor Center Rehabilitation	354 Chase Street	33	10/22/2068	Low
Total		254		Low

SOURCE: California Housing Partnership, Preservation Database (August, 2024).

NOTE: Universe: HUD, Low-Income Housing Tax Credit (LIHTC), USDA, and CalHFA projects. Subsidized or assisted developments that do not have one of the aforementioned financing sources may not be included. While California Housing Partnership's Preservation Database is the state's most comprehensive source of information on subsidized affordable housing at risk of losing its affordable status and converting to market-rate housing, this database does not include all deed-restricted affordable units in the state. Consequently, there may be at-risk assisted units in a jurisdiction that are not captured in this data table. Per HCD guidance, local jurisdictions must also list the specific affordable housing developments at-risk of converting to market rate uses. This document provides aggregate numbers of at-risk units for each jurisdiction, but local planning staff should contact Danielle Mazzella with the California Housing Partnership at dmazzella@chpc.net to obtain a list of affordable properties that fall under this designation. California Housing Partnership uses the following categories for assisted housing developments in its database: Very-High Risk: affordable homes that are at-risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. High Risk: affordable homes that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Moderate Risk: affordable homes that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Low Risk: affordable homes that are at-risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.

Rental Assistance

Rental subsidies using non-federal (state, local, or other) funding sources can be used to maintain affordability of at-risk units. These rent subsidies can be structured to mirror the federal Housing Choice Voucher (Section 8) program. Under Section 8, HUD pays the difference between what tenants can pay (defined as 30 percent of household income) and what HUD estimates as the fair market rent on the unit. The feasibility of this alternative is highly dependent on the availability of other funding sources necessary to make rent subsidies available and the willingness of property owners to accept rental vouchers if they can be provided. Housing Choice Vouchers are available through the Stanislaus Regional Housing Authority.

Transfer of Ownership

Transferring ownership of an at-risk project to a nonprofit housing provider is generally one of the least costly ways to ensure that at-risk units remain affordable for the long term. By transferring property ownership to a nonprofit organization whose mission includes affordable housing, the risk

of losing the low-income restrictions is minimized, and the project would become potentially eligible for a greater range of governments assistance. The Stanislaus Regional Housing Authority is the most likely entity to acquire ownership of at-risk units.

Purchase of Affordability Covenants

Another option to preserve the affordability of at-risk projects is to provide an incentive package to the owners to maintain the projects as affordable housing. Incentives could include bringing down the interest rate on the remaining loan balance, providing loans for capital improvements, and/or supplementing subsidies. The feasibility of this option depends on whether the complex is too highly leveraged. By providing lump sum financial incentives or ongoing subsidies in the form of rents or reduced mortgage interest rates to the owner, the City can ensure that some of all of the units remain affordable.

Cost Comparisons

The above analysis attempts to estimate the cost of preserving the at-risk units under assorted options. However, because projects have different circumstances and therefore different options available, a direct comparison would not be appropriate. In general, providing additional incentives/subsidies to extend the affordability covenant would require the least funding over the long run, whereas the construction of new units would be the costliest option.

2.0 Housing Constraints Assessment

2.1 Governmental Constraints

Governmental constraints are potential and actual policies, standards, requirements, fees, or actions imposed by the various levels of government on development, which serve to ensure public safety and welfare with respect to housing construction and land use issues. Federal and state programs and agencies play a role in the imposition of non-local governmental constraints and are beyond the influence of local government, and therefore cannot be effectively addressed in this document.

Transparency

In accordance with Assembly Bill (AB) 1483, the City provides zoning and development standards on the City's website by reference to the City's Municipal Code.[1] Residential Development Fee Schedules, Development Impact Fees,[2] and links to the Zoning Map,[3] Design Standards, General Plan,[4] Planning Applications, and Application Checklists are also readily available on the City's website through the Community Development Department.

General Plan Consistency

The Housing Element is closely tied to other General Plan elements, including the land use, circulation, open space, and safety elements. To ensure internal consistency throughout the planning period, Program 1.16 requires the City to conduct periodic reviews of General Plan elements and municipal code to identify any potential inconsistencies with the Housing Element. Where inconsistencies are identified, the City will initiate appropriate amendments to the municipal code and/or updates to relevant general plan policies and programs. This ongoing review process will support the coordinated implementation of housing goals alongside broader community planning objectives.

Land Use Element

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of a General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, and public or

[1] https://www.pattersonca.gov/275/View
[2] https://www.pattersonca.gov/156/Residential-Commercial-Fee-Schedules
[3] https://www.pattersonca.gov/157/Zoning-Districts
[4] https://www.pattersonca.gov/145/General-PlanCity-Maps

community facilities. As it applies to housing, the Land Use Element establishes a range of residential land use categories, specifies development densities, and suggests the types of housing appropriate in a community.

A number of factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce development costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing, and offer a variety of housing options that meet the needs of the community.

The City of Patterson General Plan Land Use Element and General Plan Map provide for a range of residential building types and densities in various areas of Patterson. Table 2-1 summarizes the land use designations with the city that allow residential uses, as well as their permitted densities.

Table 2-1 General Plan Residential Land Use Designations

Land Use Designation	Corresponding Zoning District	Intended Use	Permitted Density (du/acre)
Low Density Residential	LR	Single-Family	1.1—5.0
Downtown Residential	DR	Single-Family, Duplexes, ADUs, Emergency Shelters, Transitional Housing	3.1—10.0
Medium Density Residential	MR	Single-Family, Multi-Family, Emergency Shelters, Transitional Housing	5.1—12.0
High Density Residential	HR	Single-Family, Multi-Family, Group Quarters, Emergency Shelters, Transitional Housing	12.1—20.0
Estate Residential	ER	Single-Family, ADUs	See note[1]

SOURCE: City of Patterson, 2024

NOTE: 1 Allows one dwelling unit per 0.5 acres up to one dwelling unit per 3 acres except for parcels subject to the safety or noise restrictions of an adopted Airport Land Use Plan in which case the minimum parcel shall be 10 acres.

Zoning Ordinance

The Zoning Ordinance is the primary tool for implementing the General Plan Land Use Element. It is designed to protect and promote public health, safety and welfare, as well as to promote quality design and quality of life. Patterson's residential zoning districts control both the use and development standards of each residential lot or parcel, thereby influencing the development of housing. The City has established five residential zoning districts, including Estate Residential (ER),

Low Density Residential (LR), Downtown Residential (DR), Medium Density Residential (MR), and High Density Residential (HR). There are also five commercial districts that permit residential uses, including Neighborhood Commercial (NC), Highway Service Commercial (HSC), Downtown Core (DC), General Commercial (GC), and Medical Professional Office (MPO). In addition to the underlying zoning, the City has also established four overlay districts, including Planned Development (PD), Historic Preservation, Mixed-Use (MU), and Mixed-Use Hillside (MUH) with special development standards and/or permit processing requirements.

Development Standards

Zoning regulations also control features such as the height and bulk of buildings, lot area, yard setbacks, density, etc. If development standards are significantly more rigid than private sector design standards and do not allow sufficient flexibility in their application, then development costs can increase and housing production can decrease. Table 2-2 and Table 2-3 summarize the city's zoning districts that permit residential uses and their development requirements.

Multi-Family Residential Development Standards

The City's High Density Residential Zoning Districts are designated for high density residential uses, including townhomes, condos, multi-family apartments, single-room occupancies (SROs), and transitional and supportive housing. The City's High Density Residential Zoning Districts conditionally permit single-family uses. This can function as a deterrent to single-family uses in zoning districts that allow greater density and can encourage redevelopment of sites with multi-family projects. Single-family uses are directed to specific zoning districts as permitted uses to avoid competing with the development of higher density uses like multi-family residential.

The High Density Residential Zoning District is designed for higher-density residential developments requiring a minimum lot size of 10,000 square feet and densities ranging from 12.1 to 20.0 dwelling units per acre. The maximum building height is 45 feet (three stories), and lot coverage is capped at 75 percent, with 60 percent allowed for front yards. Setbacks are more stringent, with 25 feet required for the front, 15 feet for the living area, 15 feet for side setbacks (increasing to 25 feet on corner lots), and 20 feet for the rear. These standards allow for denser and taller multi-family developments but still require substantial setbacks and lot sizes, which could limit the number of units that can be developed on smaller parcels. Further, the permitted densities and height limits may pose constraints to future development of affordable multi-family residential units.

The Neighborhood Commercial Zoning District permits a minimum density of 3.1 to a maximum of 10 dwelling units per acre, with a maximum building height of 35 feet (two stories). Lot coverage is capped at 75 percent, and the front setback requirement is a maximum of 10 feet. There are no specific side or rear setback requirements, nor are there additional specifications for living area setbacks. This zoning is designed to support a mix of commercial uses that serve the local community while integrating with residential areas.

Table 2-2 Existing Residential Development Standards by Zoning District

Zoning District	Lot Area (sq. ft.)	Density (du/ac)	Building Height (ft.)	Lot Dimensions	Lot Coverage	Front Setback General (ft.)	Front Setback Living Area (ft.)	Side Setback (ft.)	Rear Setback (ft.)
Estate Residential	Minimum: 12,000 Corner Minimum: 14,000	1.0 (max)[1]	Maximum: 32' (2 stories)[2]	Interior lot: 60' Corner lot: 70' Cul-de-sac average width: 60' Cul-de-sac frontage: 40' Depth: 100'	Maximum: 40% Maximum front yard: 60% Maximum footprint: 25%	20'	15'	Interior lot: 5' Street side/Corner lot: 10'	Rear yard: 20' Alley ROW: 5'
Low Density Residential	Minimum: 6,000 Corner Minimum: 7,000	1.1—5.0	Maximum: 32' (2 stories)[2]	Interior lot: 45' Corner lot: 70' Cul-de-sac average width: 45' Cul-de-sac frontage: 35' Depth: 70'	Maximum: 70% Maximum front yard: 60% Maximum footprint: 35%	LR-n: 20' LR-w: 20'	LR-n: 15' LR-w: 15'	Interior lot: 5' Street side/Corner lot: 10'	Rear yard: 20' Alley ROW: 5'
Downtown Residential	Minimum: 6,000 Corner Minimum: 7,000	3.1—10.0	Maximum: 45' (3 stories)[2]	Interior lot: 45' Corner lot: 70' Cul-de-sac average width: 45' Cul-de-sac frontage: 35' Depth: 70'	Maximum: 80% Maximum front yard: 75% Maximum footprint: 35%	20'	15'	Interior lot: 5' Street side/Corner lot: 10'	Rear yard: 20' Alley ROW: 5'
Medium Density Residential	Minimum: 9,000[1]	5.1—12.0	Maximum: 32' (2 stories)[2]	Interior lot: 50'[1] Corner lot: 70' Cul-de-sac average width: 50'[1] Cul-de-sac frontage: 35' Depth: 70'	Maximum: 75% Maximum front yard: 60%	20'	15'	Interior lot: 5' Street side/Corner lot: 10'	Rear yard: 20' Alley ROW: 5'
High Density Residential	Minimum: 10,000	12.1—20.0	Maximum: 45' (3 stories)[2]	Interior lot: 70' Corner lot: 70' Cul-de-sac average width: 70' Cul-de-sac frontage: 50' Depth: 100'	Maximum: 75% Maximum front yard: 60%	25'	15'	Interior lot: 15' Street side/Corner lot: 25	Rear yard: 20' Alley ROW: 5'

Zoning District	Lot Area (sq. ft.)	Density (du/ac)	Building Height (ft.)	Lot Dimensions	Lot Coverage	Front Setback General (ft.)	Front Setback Living Area (ft.)	Side Setback (ft.)	Rear Setback (ft.)
Neighborhood Commercial	Minimum: 2,000	3.1—10.0	Maximum: 35' (2 stories)	n/a	Maximum: 75%	Maximum: 10'	n/a	n/a	n/a
Downtown Core	Minimum: 2,000	12.1—20.0	Maximum: 45' (3 stories)	n/a	Maximum: 100%	Maximum: 10'	n/a	n/a	n/a

SOURCE: City of Patterson, 2024

NOTE: 1 Minimum lot size requirements for single-family units in this district shall be three thousand five hundred square feet. Minimum lot dimensions shall be the same as the minimum dimensions in the LR-n district.
2 Accessory structure permitted maximum height of 12 feet (one story).

Table 2-3 Existing Residential Development Standards – Distance Between Buildings

Zoning District	Distance between Main Building & Accessory Buildings	Distance between Accessory Buildings	Distance between Main Buildings	Distance between any Wall of a Main Building Containing Living Room Windows and any other Wall of a Main Building	Distance between Wall of a Single-Family Home and Neighboring Single-Family Home (Primary Structure Only)
Estate Residential	10'	10'	10'	10'	15'
Low Density Residential	10'	10'	10'	10'	LR-n: 10' LR-w: 15'
Downtown Residential	10'	10'	10'	10'	10'
Medium Density Residential	10'	10'	25'	35'	n/a
High Density Residential	10'	10'	25'	35'	n/a

SOURCE: City of Patterson, 2024

The Downtown Core Zoning District allows for higher density development with a range of 12.1 to 20 dwelling units per acre and permits buildings up to 45 feet (three stories). Minimum lot area requirements are set at 2,000 square feet, and lot coverage can reach up to 100 percent, maximizing the use of available space. The front setback is limited to a maximum of 10 feet, promoting a pedestrian-friendly streetscape. No specific side or rear setback requirements are indicated, which encourages a more continuous and dense urban form, suitable for a vibrant downtown environment.

As shown in Table 2-3, the Medium Density Residential and High Density Residential Zoning Districts require larger distances between buildings (25 feet between main buildings and 35 feet between buildings with living room windows and any other wall, respectively), which can limit the density of multi-family developments. These distances reduce the potential to maximize the number of units on a given parcel, particularly in higher-density residential settings, making it challenging to achieve the upper bounds of allowable densities.

Parking Requirements

Table 2-4 summarizes residential parking requirements in Patterson. Parking requirements do not constrain the development of housing directly. However, parking requirements may reduce the amount of available lot area for residential development. The City determines the required number of parking spaces based on the type and size of the residential unit. While the City's parking standards require covered parking spaces, they do not specifically mandate garages. Carports are also permitted to meet these requirements, providing a cost-effective alternative to garages. Therefore, this flexibility helps prevent additional financial constraints on residential development.

Existing parking requirements for multi-family units and apartments may constrain development. To remove this potential constraint, the City proposes an amendment to the Zoning Ordinance to reduce parking requirements for multi-family residential units and apartments as part of Program 1.9 (see Chapter 3). The City will also provide incentives, including amending the Zoning Ordinance to include bike parking and bus passes for the first 10 years of occupancy for new affordable units (Program 1.9).

Additionally, the City provides reduced parking requirements for affordable housing projects consistent with State Density Bonus Law. However, the recently passed AB 2162 removes minimum parking requirements for supportive housing within 0.5 mile of a public transit stop. This Housing Element includes Program 4.9 to amend the Zoning Ordinance to comply with AB 2162 (see Chapter 3). These actions are rooted in removing parking related constraints to the development of multi-family residential and increasing resident mobility.

Table 2-4 Existing Residential Parking Requirements

Type of Residential Development	Required Parking Spaces/Dwelling Unit
Single-Family & Multi-Family Residential	Studio or 1-bedroom: 1 covered space 2-bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: 2 covered spaces
Apartments	Studio: 1 covered space 1-bedroom: 1.5 (1 covered) spaces 2+ bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: Same as 2-bedroom, plus 1 additional guest parking space for every 3-bedroom unit
Senior Housing	Same number of spaces required for dwellings or apartments; however, the number of spaces may be reduced if the planning commission makes a finding that not all spaces are needed*

SOURCE: City of Patterson, 2024

NOTES: * In making this finding, the commission shall consider: (1) the anticipated vehicle usage and characteristic visitor patterns of the occupants; (2) proximity of the building or site to shopping, service, health care facilities, and other transportation facilities; (3) proximity of public and commercial parking areas; (4) effect a reduced number of spaces would have on existing and anticipated parking conditions in the neighborhood; and (5) conditions deemed relevant by the planning commission.

Covered spaces may include a carport or a garage; however, garages are not a requirement to comply with parking standards.

Cumulative Impacts of Development Standards

The combination of setbacks, height limits, lot coverage restrictions, low development densities, and required building separation in the High Density Residential, Neighborhood Commercial, and Downtown Core Zoning Districts may pose challenges to maximizing multi-family development potential. These constraints can limit the number of units that can be developed on a site, potentially hindering efforts to increase housing density and supply in these areas. To remove barriers to the development of affordable housing types, including multi-family residential, transitional and supportive housing, single-room occupancy units, etc., the City is committed to implementing the changes listed in Table 2-5. The proposed changes to development standards do not apply to the Master Plan areas.

Program 1.10 proposes these amendments to the Zoning Code and establishes a schedule of actions and timelines from implementation (see Chapter 3). Implementation of the aforementioned measures will ensure that the development of affordable residential housing types is not hindered by local development standards.

Overlay Districts

The City has four overlay districts, Planned Development (PD), Historic Preservation (HP), Mixed-use (MU), and Mixed-Use Hillside (MUH). These overlay zoning districts are designed to supplement the use regulations and/or development standards of the applicable underlying base zoning district by recognizing distinctive areas of the city that have special and unique social, architectural, or environmental characteristics that require special considerations not otherwise adequately provided by the underlying base zone applicable to the property. Each overlay district is described below.

Table 2-5 Proposed Changes to Development Standards, City of Patterson

Zoning District	Existing Standards	Proposed Standards
High Density Residential	Density: 12.1—20.0 Front setback: 25' Rear setback: 20' Height Maximum: 45' (3 stories) Distance between main buildings: 25' Distance between any wall of a main building containing living room windows and any other wall of a main building: 35'	Density: 20.1—35.0 Front setback: 15' Rear setback: 15' Height Maximum: 45' (4 stories) Distance between main buildings: 15' Distance between any wall of a main building containing living room windows and any other wall of a main building: 20'
Neighborhood Commercial	Density: 3.1—10.0 Height Maximum: 32' (2 stories)	Density: 12.0—20.0 Height Maximum: 32' (3 stories)
Downtown Core	Density: 12.1—20.0 Height Maximum: 45' (3 stories)	Density: 20.0—35.0 Height Maximum: 50' (4 stories)
Development Type	**Parking Requirements**	
Single-Family & Multi-Family Residential	Studio or 1-bedroom: 1 covered space 2-bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: 2 covered spaces	Studio or 1-bedroom: 1 covered space 2-bedrooms: 1.5 covered spaces 3+ bedrooms: 2 covered spaces
Apartments	Studio: 1 covered space 1-bedroom: 1.5 (1 covered) spaces 2+ bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: Plus 1 additional guest parking space for every 3-bedroom unit	Studio: 1 covered space 1-bedroom: 1 covered space 2+ bedrooms: 1.5 uncovered spaces 3+ bedrooms: 2 covered spaces
Senior Housing	Same number of spaces required for dwellings or apartments; however, the number of spaces may be reduced if the planning commission makes a finding that not all spaces are needed*	n/a

SOURCE: City of Patterson, 2024

NOTE: These proposed changes to development standards do not apply to the Zacharias Baldwin Ranch Master Plan areas.

* In making this finding, the commission shall consider: (1) the anticipated vehicle usage and characteristic visitor patterns of the occupants; (2) proximity of the building or site to shopping, service, health care facilities, and other transportation facilities; (3) proximity of public and commercial parking areas; (4) effect a reduced number of spaces would have on existing and anticipated parking conditions in the neighborhood; and (5) conditions deemed relevant by the planning commission.

Planned Development Overlay District

The Planned Development Overlay District requires submittal of a Planned Development entitlement application for any proposed development on property zoned Planned Development. The Planned Development Overlay District is an optional zoning designation designed to offer flexibility in the development of projects and can result in higher densities. Projects with a land area five acres or greater, or projects with construction square footage of 30,000 square feet or greater are

subject to the Planned Development review process. The Planned Development entitlement process includes recommendation of the project at a public hearing of the Planning Commission, which is then taken to the City Council for a decision to deny, approve, or conditionally approve the project (Municipal Code Section 18.20.020).

Design objectives within a Planned Development proposal should address the following: building bulk and height, land coverage, visual impact on adjacent areas, and design compatibility with nearby structures and land uses. This includes ensuring harmonious composition of mass, scale, color, texture, relationship to streets, views, and integration of spaces. The proposal should provide an efficient, direct pedestrian circulation system, landscaping, and appropriate treatment of public areas, as well as integrating off-street parking and loading areas into the overall vehicular circulation system. The City Council may impose additional standards, which may be more or less restrictive than those in the code, to protect property values, community amenities, and the general welfare. These standards may include the following:

- Building height limitations;
- Restrictions on land coverage by buildings;
- Parking ratios and designated areas;
- Requirements for vehicular and pedestrian access;
- Landscaping plans for trees, shrubs, and turf;
- Specifications for fences, walls, and lighting;
- Regulations on signs and advertising structures;
- Building arrangement and spacing for open spaces;
- Off-street loading area requirements;
- Use limitations based on parking, noise, dust, odors, fumes, smoke, vibration, glare, or radiation;
- Architectural design standards;
- Requirement of security instruments to ensure compliance; and
- Naming of roads and streets per city policy. (Ord. 767 (part), 2014; Ord. 738 § 1 (Exh. A) (part), 2013).

The City Council's additional standards may impose significant constraints on multi-family residential development by enforcing subjective criteria for building height, land coverage, parking, and architectural design. These subjective standards, aimed at protecting property values and community welfare, could lead to restrictions on the density and design of multi-family housing projects, making it challenging for developers to meet the criteria. The discretionary nature of these standards creates uncertainty, potentially leading to delays, increased costs, and reduced feasibility for multi-family developments, which may not align with the Council's vision for maintaining

neighborhood character and minimizing impacts such as noise, traffic, and visual changes. The unpredictability of the approval process may discourage development, making it more difficult to move forward with multi-family projects.

To reduce potential constraints on multi-family residential development, the City proposes Program 1.8, which commits the City to developing Objective Design Standards (ODS) for mixed-use and multi-family residential projects. By implementing these objective standards, the City aims to eliminate subjectivity in the design review process, providing greater certainty for project applicants and developers. ODS are discussed further below.

Master Planned Areas

The City permits the development of master planned areas to enable coordinated, comprehensive planning of specific subareas to achieve various goals, such as protecting unique environmental, historical, architectural, or other significant site features that cannot be adequately preserved through other zoning. Master planning also helps implement specific goals and policies of the general plan, addresses future circulation, drainage, and neighborhood compatibility issues, and provides flexibility beyond conventional zoning regulations.

Approval of a Master Plan requires recommendation from the Planning Commission to the City Council, followed by a public hearing of the City Council for the final decision. The following findings are required for adoption:

1. The proposed master plan is consistent with the goals, policies, and objectives of the general plan; and
2. The proposed master plan meets the requirements set forth in title 18.20.030(E). (Ord. 738 § 1 (Exh. A) (part), 2013).

These required findings of approval do not present significant constraints to development.

Specific Planned Areas

The City allows specific plans to implement the general plan on an area-specific basis, serving as regulatory documents consistent with the general plan. The general plan designates certain new development areas that require a specific plan or master plan to implement its policies. Specific plans are encouraged if they enhance the implementation of the general plan. Approval of a Specific Plan requires a recommendation from the Planning Commission to the City Council, followed by a public hearing of the City Council for the final decision. The following findings are required for adoption:

1. The specific plan is consistent with the goals, policies, and objectives of the general plan, development agreement, or other implementation instrument; and
2. The specific plan will not adversely affect surrounding properties. (Ord. 738 § 1 (Exh. A) (part), 2013).

These required findings of approval do not present significant constraints to development.

Historic Preservation Overlay District

The Historic Preservation Overlay District aims to promote public health, safety, and welfare by identifying, protecting, and enhancing buildings, structures, sites, and areas that reflect Patterson's historical, architectural, and aesthetic character. It serves as an overlay to existing zoning districts, providing additional review and development standards for properties of historical significance.

The Planning Commission reviews design plans, building permits, and other applications for construction, alteration, or demolition of designated historic resources, while the City Council holds final approval authority for historic designations. Historic designation criteria and procedures are detailed in Municipal Code Chapter 18.54.

Mixed-Use Overlay District

The Mixed-Use Overlay District is intended to provide flexibility within areas zoned for commercial or office development to allow for residential development. This overlay district allows 100 percent non-residential uses. The Mixed-Use overlay can be applied to all base zoning districts in the Commercial and Medical/Professional Office Districts (as listed in Chapter 18.42). The following development standards are applicable to properties that implement the Mixed-Use Overlay District:

- Residential density shall be permitted up to 24 dwelling units per net site acre (in addition to any commercial square footage);
- Residential units may be provided in addition to other development permitted or conditionally permitted on the project site;
- Residential units may be provided on upper levels of commercial and/or office buildings or may be located in a separate building adjacent to commercial and/or office structures;
- No more than 50 percent of all ground floor buildings may be residential development; and
- An additional 12 feet of additional building height above the specific height limit is permitted within the applicable zoning district (Ord. 738 § 1 (Exh. A) (part), 2013).

The architectural and site plan review process for projects implementing the Mixed-Use Overlay follows the base zoning district review process outlined in Municipal Code Chapter 18.18.

Mixed-Use Hillside Overlay District

The Mixed-Use Hillside Overlay District is intended to provide hillside development standards. Areas within the city that allow the Mixed-Use Hillside overlay are identified on the City's Zoning Map. All property with the Mixed-Use Hillside designation is analyzed to categorize hillsides into five slope categories and establish limits on development as follows:

1. Slope Zone 1 (Five Percent Natural Slope or Less). This is not a hillside condition. Grading with conventional fully padded lots and terracing is acceptable;

2. Slope Zone 2 (Five Percent to 7.99 Percent Slope). Development with grading is permitted in this zone, but existing landforms must retain their natural character. Padded building sites are permitted; however, techniques such as contour grading, combined slopes, limited cut and fill, and split-level architectural prototypes, or padding for the structures only, may be required to reduce grading;
3. Slope Zone 3 (Eight Percent to 14.9 Percent Slope). This is a hillside condition. Special hillside architectural and design techniques that minimize grading are required in this zone. Architectural prototypes are expected to conform to the natural landform by using techniques such as split-level foundations of greater than eighteen inches, stem walls, stacking, and clustering;
4. Slope Zone 4 (15 Percent to 29.9 Percent). Development within this zone is limited to no more than the less visually prominent slopes and then only where it can be shown that safety, environmental, and aesthetic impacts can be minimized. The use of larger lots, variable setbacks, and variable building structural techniques such as stepped or pole foundations are expected. Structures shall blend with the natural environment through their shape, materials, and colors. Impact of traffic and roadways is to be minimized by following natural contours or using grade separations; and
5. Slope Zone 5 (30 Percent and Over). This is an excessive slope condition and development is prohibited, unless all the following are satisfied: (a) at least 75 percent of the lots or parcels that are the subject of the development application are surrounded by lots or parcels improved with structures; (b) the proposed project is determined to appropriately address slope stability and other geological factors of the site and (c) vegetation fuel management for wildfire protection can be achieved and maintained. (Ord. 738 § 1 (Exh. A) (part), 2013).

The architectural and site plan review process for projects implementing the Mixed-Use Hillside Overlay follows the base zoning district review process outlined in Municipal Code Chapter 18.18.

Zacharias and Baldwin Ranch Master Plan (ZBMP)

Adopted in August 2022, the Zacharias and Baldwin Ranch Master Plan governs two distinct areas in the city's north and south ends, west of Ward Avenue, with unified development standards to ensure consistency. Grounded in the City's Municipal Code, the Master Plan incorporates additional development standards and design guidelines to shape residential neighborhoods. These guidelines address key elements such as pedestrian scale, garage placement, streetscape, landscaping, fencing, four-sided articulation, architectural variation and massing, and utility integration. The specific development standards for residential uses within the Master Plan areas are outlined below.

Low Density Residential

Permitted densities range from 3.0 to 5.0 dwelling units per acre, predominantly consisting of single-family homes. Typical lot sizes for production housing are 50 x 100 feet. The permitted uses and development standards from the Low Density Residential (LR) Zoning District of the Patterson Zoning Ordinance are applicable in this area.

Medium Density Residential

Permitted densities range from 5.1 to 12.0 dwelling units per acre, primarily focusing on production housing, including attached and detached single-family units, duplexes, and accessory dwelling units. Table 2-6 details development standards for the Medium Density Residential (MR) Zoning District.

The development standards for the Medium Density Residential land use designation in the Master Plan are optimized for attached housing types such as townhomes and duplexes, as well as traditional detached single-family units. These standards, including flexible setbacks, smaller lot sizes, and allowances for higher densities, promote compact housing that efficiently utilizes land while offering a range of housing options for diverse households. Although detached single-family homes are permitted, the regulations are also suited for smaller, attached units, reflecting a clear emphasis on medium-density development that supports housing variety.

Table 2-6 Medium Density Residential Development Standards (ZBMP)

Uses	
Permitted and Conditional Uses	Refer to City of Patterson Zoning Regulations, Chapter 18.38 MR, Medium Density Residential District.
Density	
Minimum	5.1 du/ac
Maximum	12.0 du/ac
Setbacks	
Front yard	
Living Area	15 ft second story 12 ft first story 5 ft court, townhome or similar products
Porch/Balcony	10 ft 5 ft for court, townhome, or similar product
Garage	20 ft 5 ft for court, townhome or similar product garages
Side – interior lot	4 ft (detached) 0 ft (duplexes and townhomes)
Side – street side/corner lot	10 ft 20 ft garages May be reduced to 5 ft if side yard does not abut the front yard of an adjacent lot.
Rear Yard	10 ft
Rear Yard – setback to alley ROW	3 ft
Distance Between Buildings	8 ft

Other Design Regulations		
Landscaping	See Municipal Code Chapter 18.78	
Lighting	See Municipal Code Chapter 18.80	
Fences, Walls, and Screening	See Municipal Code Chapter 18.70	
Parking	See Municipal Code Chapter 19.76	For housing product types with no driveway available for guest parking, 1 guest parking space per 3 units.
Signs	See Municipal Code Chapter 18.82	
Projections and Encroachments	See Municipal Code Sections 18.60.030 and 18.60.040.	
Lot Configuration		
Lot Area		Smaller lot sizes with different lot dimensions may be approved by the Planning Commission for other housing products.
Minimum	2,740 sq ft conventional 1,200 sq ft court	
Corner Minimum	4,900 sq ft	
Lot Dimensions (minimum)		
Width/frontage – interior lot	37 ft conventional 29 ft court	
Width/frontage – corner lot	55 ft conventional	
Average width – cul-de-sac	40 ft conventional	
Depth	70 ft conventional 45 ft court	
Block Length	300 – 400 ft	
Building Massing		
Height (maximum)		
Primary structure/unit	35 ft	
Accessory Structure	25 ft	
Lot Coverage (maximum impervious surface)		
Maximum	80 percent	
Maximum (front yard)	60 percent	
Building Floor Area – primary dwelling	1,000 sq ft minimum	
Porch/Courtyard	30 percent of all dwelling units 6 ft x 10 ft minimum dimensions	Alternatives may be considered through the design review process if a similar effect is achieved.

SOURCE: Zacharias and Baldwin Ranch Master Plan, August 2022; City of Patterson Municipal Code

High Density Residential

Permitted densities range from 12.1 to 25.0 dwelling units per acre, accommodating various housing types such as apartments, townhomes, flats, and condominiums, including both rental and ownership options. The development standards for the High Density Residential (HR) Zoning District are detailed in Table 2-7.

Table 2-7 High Density Residential Development Standards (ZBMP)

Uses		
Permitted and Conditional Uses	Refer to City of Patterson Zoning Regulations, Chapter 18.38 HR, High Density Residential District.	
Density		
Minimum	12.1 du/ac	May be eligible for a bonus as described in Municipal Code Chapter 18.88
Maximum	25.0 du/ac	
Setbacks		
Front yard		
Living Area	10 ft	
Porch/Balcony	5 ft	
Side – interior lot	10 ft first story 5 ft per story thereafter	
Side – street side/corner lot	20 ft	
Rear Yard	10 ft	
Distance Between Buildings	10 ft minimum living area; 5 ft garage	
Other Design Regulations		
Landscaping	See Municipal Code Chapter 18.78	
Lighting	See Municipal Code Chapter 18.80	
Fences, Walls, and Screening	See Municipal Code Chapter 18.70	
Parking	See Municipal Code Chapter 18.76	
Signs	See Municipal Code Chapter 18.82	
Projections and Encroachments	See Municipal Code Sections 18.60.030 and 18.60.040.	

Lot Configuration		
Lot Area - Minimum		Smaller lot sizes with different lot dimensions may be approved by the Planning Commission for other housing products.
General	10,000 sq ft	
Townhome ownership units	1,000 sq ft	
Width/frontage – Minimum		
General	70 ft	
Townhome ownership units	20 ft	
Depth		
General	100 ft	
Townhome ownership units	50 ft	
Building Massing		
Height (maximum)	55 ft (4 stories)	
Lot Coverage (maximum impervious surface)		
Maximum	80 percent	
Maximum (front yard)	75 percent	
Building Floor Area	800 sq ft minimum lower floor area	
Porch/Courtyard	6 ft x 10 ft minimum dimension	

SOURCE: Zacharias and Baldwin Ranch Master Plan, August 2022; City of Patterson Municipal Code

The development standards for the High-Density Residential land use designation in the Master Plan support multifamily housing by encouraging compact lot configurations, modest setbacks, and vertical construction, with a 55-foot (four-story) height limit. However, the 12.1 to 25.0 dwelling units per acre density range, along with larger setbacks for corner lots and height limits, could constrain future affordable multifamily development. The City is collaborating with local developers to incentivize affordable projects in line with lower-income RHNA goals, as detailed in Program 1.6 (see Chapter 3). Overall, the standards balance high-density housing needs with site design flexibility, particularly for townhomes and multifamily units.

Mixed-Use District

The Mixed-Use District provides flexibility in design and focuses on creating a "town center" that blends commercial and residential uses. A key focus for the Mixed-Use District is to provide an opportunity for live/work options. Development of multi-family units would include amenities such as dedicated workspace on the ground floor. Table 2-8 details development standards for the Mixed-Use District.

Table 2-8 Mixed-Use Development Standards (ZBMP)

Standard	MU	Additional Standards
Density (units per acre)		
Minimum	12.0	
Maximum	25.0	In addition to any commercial square footage; may be eligible for density bonus.
Lot Coverage		
Minimum floor area ratio	0	
Maximum floor area ratio	3	
Maximum impervious surface	100%	
Setbacks		
Front yard minimum	No minimum	
Front yard maximum	10 ft	
Side yard minimum	No minimum	
Rear yard minimum	No minimum	
Setback from Single-Family – rear or side yard	10 ft	6 ft landscape buffer required
Lot Area and Dimensions		
Lot Area	No minimum	
Width	No minimum	
Depth	No minimum	
Height		
Building/Structure	4 stories (65 ft)	
Residential Uses		
Ground Floor	Maximum 75% residential	See Guideline in Master Plan.
Residential Units	May be located in upper levels or in a separate building	
Live/Work Units	See regulations in Municipal Code Chapter 18.68.	
Other Elements		
Landscaping	See regulations in Municipal Code Chapter 18.78.	
Lighting	See regulations in Municipal Code Chapter 18.80.	
Fences, Walls, and Screening	See regulations in Municipal Code Chapter 18.70.	
Parking and Loading*	See regulations in Municipal Code Chapter 18.76.	
Signs	See regulations in Municipal Code Chapter 18.82.	
Projections and Encroachments	See regulations in Municipal Code Chapter 18.60.	

SOURCE: Zacharias and Baldwin Ranch Master Plan, August 2022; City of Patterson Municipal Code

NOTE: * Parking in a mixed-use development may be reduced up to 30 percent with administrative review by planning director. Factors to consider in approving a parking reduction include the following. All these elements must be present to approve an administrative reduction.

1) On-street parking spaces may be counted toward off-street parking requirements if conveniently accessible.
2) The project includes a mixed-use development with residential and retail and/or office uses, including evidence that there are uses with differing operating hours.
3) Provision of pedestrian plazas, seating areas, shelters, and walkways.
4) Provision of car-share and clean air vehicle spaces.

The development standards for the Mixed-Use (MU) land use designation in the Master Plan appear flexible, but certain standards may be limiting. The density range of 12.0 to 25.0 units per acre offers moderate flexibility, but the potential cap at 25.0 units could limit higher-density development, which may be desired in urbanized areas. The height limit of four stories (65 feet) may also constrain developers seeking to maximize vertical space in denser, mixed-use areas. Overall, while the standards provide flexibility, restrictions related to density and height could limit the scale of development.

Objective Design Standards

According to California Government Code, Section 65913.4, Objective Design Standards (ODS) are defined as, "a design standard that involves no person or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal." Generally, Objective Design Standards provide clear and measurable design requirements, providing predictability and consistency for project applicants and developers. This is especially important for the development of affordable multi-family projects, which are often associated with excessive development standards and design review, hindering development.

The City currently lacks Objective Design Standards. Instead, the City relies on a set of Community Design Guidelines, adopted in 2002, which aim to inform project applicants and developers of the City's expectations and preferences for the quality and character of new developments. These guidelines are used to preserve the City's unique physical character. While the Community Design Guidelines do not appear to act as a constraint to multi-family residential development, design review is only required for new residential subdivisions, multi-family residential, commercial, and industrial projects. This has the potential to create barriers to the development of affordable housing types commonly associated with these projects, such as single-room occupancy units, second story commercial rental units, and multi-family residential units.

The absence of Objective Design Standards poses a constraint to residential development. Subjective guidelines and unclear zoning standards increase uncertainty and risk for housing developers. Objective Design Standards offer clarity for developers and assurance for the community that developments will meet measurable criteria. As previously discussed, the City proposes to establish Objective Design Standards for mixed-use and multi-family residential projects. Program 1.8 establishes an amendment to the Municipal Code to develop Objective Design Standards by Summer 2026.

Conditional Use Permits

The purpose of a conditional use permit is to ensure that certain uses, which may cause nuisances due to their nature, are appropriately integrated into specific locations or zoning districts. These uses often involve issues like noise, dust, odors, vibrations, or traffic congestion, requiring control or specific design to minimize impact. Conditional use permits (CUPs) require a public hearing and are subject to a decision of the Planning Commission. The following findings are required in order to grant a conditional use permit:

1. The requested conditional use permit is consistent with the city general plan and this title; and
2. The establishment, maintenance, or operation of the proposed use or structure will conform to the requirements and the intent of this title; and such proposed use or structure will not, under the circumstances of the particular case or as conditioned, be injurious or detrimental to the health, safety, or general welfare of persons or property in the vicinity of the proposed use, or to the general welfare of the city.

The required findings of approval do not present significant constraints to the development of affordable housing types, such as multi-family dwellings.

Variety of Housing Opportunity

Government Code Section 65583 and 65583.2 require the housing element to provide for a variety of housing types including multi-family rental housing, factory-built housing, mobile homes/manufactured housing, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. Table 2-9 identifies permitted housing types in Patterson's zoning districts.

Single-Family Uses

Single-family housing types includes residences designed for a single family where all rooms within the dwelling are interconnected, including duplexes and single-family attached dwellings (townhouses). Single-family housing units are permitted in the city's Estate Residential, Low Density Residential, and Downtown Residential Zoning Districts, and conditionally permitted in the Medium Density and Downtown Residential Zoning Districts.

Multi-Family Uses

Multi-family housing types include residences designed for three or more families living independently of each other, including triplexes, apartments, condominiums, and rooming and boarding houses. Multi-family housing developments are permitted in the Medium Density and High Density Residential Zoning Districts, and conditionally permitted in the Downtown Residential, Neighborhood Commercial, and Downtown Core Zoning Districts.

Table 2-9 Housing Types Permitted in Patterson's Zoning Districts

Type of Residential Use	Zoning District											
	Residential Districts					Commercial/Industrial Districts						
	ER	LR	DR	MR	HR	NC	HSC	DC	GC	MPO	HI	LI
Single-Family Unit	P	P	P	CUP	CUP							
Single-Family Units, attached[1]	N	CUP	CUP	P	CUP							
Duplexes[1]	AR	AR	AR	AR	AR	CUP	N	CUP	N	N		
Accessory Dwelling Unit	P	P	P	N	N							
Multi-Family	N	N	CUP	P	P	CUP	N	CUP	N	N		
Mobile Home Park	N	N	N	CUP	CUP							
Mobile Homes (accessory)	P	N	N	N	N							
Manufactured Housing[2]	P	P	P	P	P							
Family Day Care Home Small (≤ six children)	P	P	P	P	P							
Family Day Care Home Large (seven to 14 children)	CUP	CUP	CUP	CUP	CUP							
Group Care/ Facility Small[3] (≤ six persons)	P	P	P	CUP	CUP	CUP	N	N	CUP	CUP		
Group Care Facility Large[3] (≥ seven persons)	N	N	N	N	CUP	N	N	N	N	CUP		
Residential Care Facility Small (≤ six persons)	P	P	P	CUP	CUP	CUP	N	N	CUP	CUP		
Residential Care Facility Large (≥ seven persons)	CUP	CUP	CUP	CUP	CUP	CUP	N	CUP	CUP	CUP		
Transitional/Supportive Housing	CUP	CUP	CUP	CUP	CUP							
Emergency Shelter	CUP	CUP	CUP	CUP	CUP						P	
Live/Work Units[4]	CUP	N	CUP	N	N	CUP	CUP	CUP	N	N		

SOURCE: City of Patterson, 2024

NOTES: P = Permitted C= Condition Use N= not permitted AR =administrative review

Estate Residential (ER); Low Density Residential (LR); Downtown Residential (DR); Medium Density Residential (MR); High Density Residential (HR); Neighborhood Commercial (NC); Highway Service Commercial (HSC); Downtown Core (DC); General Commercial (GC); Medical/Professional Office (MPO); Heavy Industrial (HI); Light Industrial (LI)

1 Duplexes and halfplexes may be permitted with administrative use review (AR) on corner lots larger than 7,000 square feet.

2 Manufactured housing on permanent foundations, subject to provisions.

3 Facility shall be state licensed.

4 See land use classifications in Chapter 18.96 for definition of live/work quarters.

Accessory Dwelling Units

An "accessory dwelling unit" (ADU) is a secondary dwelling unit with complete independent living facilities for one or more persons and generally takes three forms, including 1) detached unit, where the unit is separated from the primary residential structure; 2) attached unit, where the unit is

attached to the primary residential structure; and 3) repurposed existing space, where the space (e.g., master bedroom or garage) within the primary residence is converted into an independent living unit. ADUs units may be an alternative source of affordable housing for lower income households and seniors. These units typically rent for less than apartments of comparable size.

California law requires local jurisdictions to adopt ordinances that establish the conditions under which ADUs are permitted (Government Code Section 65852.2). A jurisdiction cannot adopt an ordinance that totally precludes the development of ADUs unless the ordinance contains findings acknowledging that allowing ADUs may limit housing opportunities of the region and result in adverse impacts on public health, safety, and welfare. The State legislature has adopted numerous amendments to Government Code Sections 65852.2 and 65852.22 in order to promote ADUs and remove barriers to their development. Requirements include that ADUs be reviewed and approved ministerially within a specified timeline, that ADUs be permitted on single-family and multi-family lots, and limitations on the development standards that local jurisdictions can impose for ADUs.

The City of Patterson last updated its ADU provisions (Municipal Code Section 18.66) in 2013. The Patterson Zoning Ordinance defines ADUs as a second unit meaning, "an attached or detached additional residential dwelling unit which provides complete independent living facilities for one or more persons. A second unit shall include permanent provisions for living, sleeping, eating, cooking, and sanitation, on the same parcel as the single-family dwelling is situated, on a lot or parcel zoned for single-family dwelling use." Currently, ADUs are permitted in zoning districts that permit single-family uses (Estate Residential, Low Density Residential, and Downtown Residential Zoning Districts).

To comply with changes in State law, the City is required to update its ADU provisions. This Housing Element includes Program 4.12 to amend the City's ADU Ordinance to comply with State law (see Chapter 3).

Manufactured Housing

Government Code Section 65852.3 requires jurisdictions to permit manufactured or mobile homes meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts. The City of Patterson Zoning Ordinance defines manufactured housing as "a single-family detached dwelling unit constructed in accordance with the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended. This definition is intended to include mobile homes and modular homes which meet federal standards for manufactured homes." There are no constraints on the location of factory-built housing since they are permitted in all residential zones. Mobile home parks are conditionally permitted in the Medium Density and High Density Residential Zoning Districts.

Group Homes and Residential Care Facilities

The City of Patterson permits group care facilities, defined as follows: Large group care facilities are state-licensed, providing nonmedical care and supervision for more than six adults for less than 24 hours, with no overnight stays. Small group care facilities provide nonmedical care for up to six adults, including seniors, in the provider's home, also for less than 24 hours. Large group care facilities are conditionally permitted in the High Density Residential and Medical/Professional Office Zoning Districts. Small group care facilities are permitted in Estate Residential, Low Density Residential, and Downtown Residential Zoning Districts and are conditionally permitted in Medium and High Density Residential, Neighborhood Commercial, General Commercial, and Medical/Professional Office Zoning Districts. Unlike residential care facilities, the City's allowed use of group care facilities does not provide 24-hour care.

The Lanterman Developmental Disabilities Services Act (Sections 5115 and 5116) of the California Welfare and Institutions Code declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six or fewer mentally disordered or otherwise handicapped persons is allowed by law. A State-authorized, certified or authorized family care home, foster home, or group home serving six or fewer persons with disabilities or dependent and neglected children on a 24-hour-a-day basis is considered a residential use to be permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes (commonly referred to as "group" homes) of six or fewer persons with disabilities than are required of the other permitted residential uses in the zone. According to Health and Safety Code sections 1267.8, 1566.3, and 1568.08, State-licensed residential care facilities for six or fewer residents, including foster care, must be permitted by right in all residential zones allowing single-family housing. Such facilities cannot be subject to more stringent development standards, fees or other standards than single-family homes in the same district.

The City of Patterson permits residential care facilities in accordance with state law. However, the Municipal Code requires updating to clarify the permitting process based on licensure and facility size. Further a definition for residential care facilities is required to distinguish these facilities from group care facilities, which the city permits as a use for less than 24-hours per day. Program 4.3 proposes an amendment to the Municipal Code to define residential care facilities and to specify the permitting process for licensed and unlicensed residential care facilities for six or fewer persons and those for seven or more persons. Program 4.3 outlines the permitting procedures for residential care facilities as follows:

- Residential Care Facilities Without Licensable Services: Residential care facilities that function as single-family residences and do not offer licensable services shall be permitted in zones that permit residential uses. These homes shall only be subject to the general health, safety, and zoning laws applicable to all single-family residences, regardless of having more than six residents. Since these homes do not provide licensable services, they should be treated like any other single-family residence;

- Residential Care Facilities with Licensable Services for Six or Fewer Residents: Residential care facilities operating as single-family residences and providing licensable services to six or fewer residents shall be permitted in zones that permit residential uses. They shall only be subject to the general health, safety, and zoning laws applicable to all single-family residences, in compliance with the Health and Safety Code protections for these smaller, licensed group homes; and
- Residential Care Facilities with Licensable Services for More Than Six Residents: Residential care facilities that provide licensable services to more than six residents shall be permitted in all zones that permit residential uses. They shall be subject only to provisions for residential uses of the same type in the same zone.

Reasonable accommodations in these permitting processes shall be considered when an application for reasonable accommodation is submitted.

Emergency Shelters

An emergency shelter is a facility that provides housing with minimal supportive services for people experiencing homelessness and is limited to an occupancy of six months. Government Code Section 65583.(a)(4) requires jurisdictions to identify a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. Adopted in 2007, Senate Bill (SB) 2 requires that local jurisdictions make provisions in the Zoning Ordinance to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish standards to regulate the development of emergency shelters. Assembly Bill (AB) 2339, passed in 2022, expands the definition of emergency shelters to include interim housing options such as low barrier navigation centers and bridge housing, and respite and recuperative housing. AB 2339 also requires that the zone(s) permitting emergency shelters by right, without discretionary review, be zones that also are suitable for residential uses. As previously mentioned, AB 139 requires local jurisdictions to amend zoning provisions for emergency shelters, establishing parking requirements based on staffing level only, provided that the standards do not require more parking for emergency standards than other residential or commercial uses within the same zone.

Currently, the City of Patterson's Zoning Ordinance permits emergency shelters in all residential zones with a Conditional Use Permit. However, the City has an Emergency Shelter Overlay Zone, which is detailed in Chapter 18.58 of the City's Zoning Ordinance, last updated in 2015. Section 18.58.020 of the Zoning Ordinance defines emergency shelters as "housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. The Emergency Shelter Overlay Zone applies to the City's Heavy Industrial (HI) Zoning District, which does not permit residential uses.

To comply with recent changes to State law, the City is required to amend its Zoning Ordinance to revise the definition of emergency shelters, and to permit emergency shelters in zones that are

suitable for and permit residential uses. The Housing Element includes Program 4.6 proposing an amendment to the Municipal Code to remove reference to the Emergency Shelter Overlay Zone and permit emergency shelters by-right in the Downtown Core (DC) Zoning District (see Chapter 3).

Although the construction of new emergency shelters is unlikely due to cost considerations, jurisdictions are required to analyze the development standards for zones where emergency shelters are permitted and could be constructed. In Patterson's Downtown Core (DC) Zoning District, development standards include a minimum density of 12.1 and a maximum of 20.0 dwelling units per acre, a floor area ratio between 0.5 and 2.0, and a maximum impervious surface of 100 percent. Setbacks include a front yard maximum of 10 feet (with no minimum), no side or rear yard setbacks, and a minimum lot area of 2,000 square feet. There are no minimum lot dimension requirements, and building height is capped at three stories or 45 feet. The development standards for the Downtown Core (DC) Zoning District are relatively flexible and generally do not pose significant constraints to development of emergency shelters.

SB 2 allows flexibility for local jurisdictions to apply written, objective development and management standards for emergency shelters. These standards must be designed to encourage and facilitate the development of, or conversion to, an emergency shelter. In accordance with SB 2, jurisdictions may apply the following objective development standards:

- The maximum number of beds or persons permitted to be served nightly by the facility;
- Off-street parking based upon demonstrated need, provided that the standards do not require more parking for emergency shelters than for other residential or commercial uses within the same zone;
- The size and location of exterior and interior on-site waiting and client intake areas;
- The provision of on-site management;
- The proximity to other emergency shelters provided that emergency shelters are not required to be more than 300 feet apart;
- The length of stay;
- Lighting; and
- Security during hours that the emergency shelter is in operation.

Section 18.58.100 of Patterson's Zoning Code identifies development and operational standards, as well as a management plan for emergency shelters, which are detailed below.

Location and Separation

- Emergency homeless shelter facilities shall be located in an emergency shelter overlay zone; and
- All shelter programs must be situated no less than three hundred feet from any other similar shelter program.

Physical Characteristics

- The maximum number of beds for emergency and transitional housing shall be twenty-five;
- Smoke detectors, approved by the Patterson fire chief, must be provided in all sleeping and food preparation areas;
- The facility shall have adequate private living space, shower and toilet facilities and secure storage areas for its intended residents;
- The size of an emergency facility shall be in character with the surrounding neighborhood; and
- The facility shall have at least one room, which has one hundred twenty square feet of floor area. Other habitable rooms shall have an area not less than seventy square feet. When more than two persons occupy a room used for sleeping purposes, the required floor area shall be increased at the rate of fifty square feet for each occupant in excess of two.

Operational Standards

- If located within one hundred fifty feet of a residential zoning district, all outdoor activity and intake areas shall be screened from public view and from the view of adjacent properties;
- If the program includes a drug or alcohol abuse counseling component, appropriate state and/or federal licensing shall be required;
- Adequate lighting shall be provided in all parking, pedestrian paths, and entry areas. Lights shall be shielded and reflected away from adjacent uses;
- Off-street parking shall be provided at a rate of one vehicle parking space per employee/volunteer plus one vehicle parking space for every ten beds;
- Adequate management, support staff and security must be present during the hours of operation of the facility. A minimum of one supervisory level staff member must be present on the site during hours of operation. Management staff must make best efforts to ensure that loitering does not occur on the property during off-hours and must ensure that clients are not creating a nuisance to the neighborhood; and
- A security guard/officer must be provided during the intake period. The shelter shall have set hours of operation and the hours shall be posted in a publicly visible and accessible location.

Management Plan

The shelter shall prepare and file with the city a management plan that includes but is not limited to:

- A resident identification process;
- Timing and placement of outdoor activities;
- Standards governing expulsions;
- Hours of operation and standard lights-out;

- Loitering control; and
- Policies regarding safety and security.

A review of the City's development standards for emergency shelters reveals three potential constraints: shelter size, parking requirements, and location. The requirement for shelter size to match the character of the surrounding neighborhood is subjective and lacks clear guidance for developers, potentially hindering shelter development depending on the zoning district. Additionally, current parking requirements are not aligned with recent State law (AB 139). Lastly, the location of emergency shelters are currently required to be located in an Emergency Shelter Overlay Zone which may increase complexity in approval. To remove these constraints, Program 4.6 proposes amendments to the Zoning Code to eliminate subjectivity from the development standards and remove reference to an emergency shelter overlay zone, instead permitting emergency shelters by-right in the Downtown Core Zoning District. (see Chapter 3).

According to the 2024 Stanislaus County Point-in-Time Count, there were 61 homeless individuals in Patterson. The Downtown Core (DC) Zoning District was chosen to permit emergency shelters due to its close proximity to public transportation, amenities, public facilities, and supportive services. Eight parcels totaling approximately 20 acres are vacant and/or underutilized and would be appropriate for small to medium sized shelter facilities and adequate to accommodate the City's unsheltered homeless residents. Furthermore, new shelters are often installed through adaptive reuse of existing buildings rather than through new construction due to costs and funding limitations.

For example, Site 9, located within the City's DC Zoning District and included in the Sites Inventory, is a vacant parcel consisting of 9.01 acres and presents potential for reuse as an emergency shelter site. Given the site's size and the City's identified homeless population of 61 individuals, only a small portion of the parcel would be needed to accommodate an emergency shelter, allowing for efficient use of land while addressing local housing and shelter needs. AB 2339 provides a general guidance or estimate of 200 square feet per person as an adequate amount of space, to calculate the realistic capacity for construction of an emergency shelter.[5] A site area of 16,000 square feet (0.37 acres) would be sufficient to accommodate up to 80 people, and therefore accommodate the City's homeless population of 61 people, including a buffer.

Additionally, there are several smaller vacant parcels and underutilized sites—such as parking lots—within the Downtown Core (DC) Zoning District that offer potential for emergency shelter development on a smaller scale. For example, two adjacent parcels (APNs 131-015-017 and 131-015-018), totaling 0.25 acres and currently used for Ace Hardware employee parking and storage, present an opportunity to develop an emergency shelter with the capacity to serve approximately 54 individuals. These sites demonstrate the flexibility within the DC District to accommodate a range of shelter options tailored to the scale of local need.

[5] Government Code 65583(3)(I).

Given that the city has property suitably zoned and available for an emergency shelter that exceeds the necessary capacity, and is in the process of establishing Municipal Code regulations to authorize emergency shelters in accordance with State law, the City is in compliance with State law.

Low Barrier Navigation Centers

AB 101, passed in 2019, requires cities to allow a low barrier navigation center (LBNC) development by-right in areas zoned for mixed-uses and nonresidential zones permitting multi-family uses if it meets specified requirements. A low barrier navigation center" is defined as "a housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low barrier navigation centers may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions.

In accordance with state law, the City permits low barrier navigation centers. However, the Municipal Code requires an update to reflect recent changes in state law related to low-barrier navigation centers. Program 4.7 proposes an amendment to the Municipal Code to establish a definition and outline the permitting procedures for low barrier navigation centers.

Transitional and Supportive Housing

Government Code Section 65583(a)(5) requires local jurisdictions to permit transitional and supportive housing as a residential use only subject to those restrictions that apply to other residential dwellings of the same type in the same zone.

Under Housing Element law, transitional housing means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (California Government Code Section 65582(h)). Supportive housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low-incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

Furthermore, recent changes to State law require supportive housing to be permitted by right where multi-family and mixed-uses are permitted, including non-residential zones permitting multi-family uses (Government Code section 65651). AB 2162 prohibits the imposition of parking requirements for supportive housing developments within 0.5 mile of a public transit stop.

In accordance with state law, the City permits transitional and supportive housing. However, the Municipal Code requires an update to reflect recent changes in state law. Program 4.9 proposes an amendment to the Municipal Code to permit transitional and supportive housing in all zones that allow residential uses, subject only to the restrictions that apply to other residential dwellings of the same type in the same manner (see Chapter 3). Furthermore, in accordance with AB 2162, the Zoning Ordinance will be amended to permit supportive housing by right in zones where multi-family and mixed-uses are permitted, including nonresidential zones that allow multi-family uses. Amendments to parking requirements for supportive housing will also be implemented in accordance with AB 2162.

Single-Room Occupancy

A single-room occupancy (SRO) unit usually is small, between 200 to 350 square feet. These units provide a valuable source of affordable housing for individuals and can serve as an entry point into the housing market for people who previously experienced homelessness. Assembly Bill (AB) 2634 (Lieber, 2006) requires the quantification and analysis of existing and projected housing needs of extremely low-income households. Housing Elements must also identify zoning to encourage and facilitate supportive housing and single-room occupancy units.

The Patterson Municipal Code currently does not define single-room occupancy (SRO) units. To align with Government Code Section 65583(c)(1), promote fair housing, and increase the availability of units for lower-income households, Program 4.10 proposes amending the Municipal Code to define single-room occupancy units and permit them by-right in all zoning districts that allow mixed-use developments (see Chapter 3).

Employee and Farmworker Housing

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted. The City's Zoning Ordinance does not distinguish employee or farmworker housing from any other type of single- or multi-family housing. As a result, if additional employee and/or farmworker units are needed there is ample vacant land in the R-1, R-2, and R-3 zones to accommodate these needs. Processing requirements and times are the same as those for other single- and multi-family housing and there are no additional permitting requirements specific to employee or farmworker housing. The City will continue to support and grant planning and development entitlements to housing projects, including employee and farmworker housing projects, which

comply with applicable City ordinances and state and federal laws. Program 4.11 proposes an amendment to the Municipal Code to explicitly state employee and farmworker housing as a permitted use in accordance with state law (see Chapter 3).

Density Bonus Ordinance

California Government Code Section 65915-65918 requires local governments to grant a density bonus to projects providing a specified percentage of affordable units, senior housing, or childcare facilities. Jurisdictions also may not enforce any development standard that would preclude the construction of a project with the density bonus and the incentives or concessions to which the developer is entitled. To ensure compliance with the State density bonus law, jurisdictions must reevaluate their development standards in relation to the maximum achievable densities for multiple-family housing.

In accordance with Chapter 4.3 Section 65915 et. seq. of the California Government Code, the City of Patterson adopted a Density Bonus Ordinance (City of Patterson Zoning Ordinance Section 18.88.010) and last updated it in 2013. Since then, the State has passed additional Density Bonus laws:

- AB 1763 (2019) – Density bonus and increased incentives for 100 percent affordable housing projects for lower income households;
- AB 2345 (2020): (Increase Maximum Allowable Density) – Revised the requirements for receiving concessions and incentives, and the maximum density bonus provided; and
- AB 1227 (2022) – Density bonus for student housing development for students enrolled at a full- time college, and to establish prioritization for students experiencing homelessness.

Program 1.4 proposes actions to update the density bonus ordinance to comply with these new provisions (see Chapter 3).

Building Codes and Code Enforcement

Building Codes

The California Building Code (CBC), part of Title 24 of the California Code of Regulations, is updated on a three-year cycle as part of the Triennial Code Adoption Cycle. This ensures the code stays current with national standards and addresses California's specific needs, including safety, sustainability, and environmental considerations. The most recent update, the 2022 CBC, became effective on January 1, 2023, following the 2021 Triennial Code Adoption Cycle. These updates apply to all buildings and structures with permit application dates on or after this effective date. In addition to the triennial updates, emergency or mid-cycle supplements may be issued to address urgent needs. The next full update will occur in 2025, with new regulations becoming effective on January 1, 2026. [6]

[6] https://www.hcd.ca.gov/building-standards/building-code-development-and-adoption-title-24

Building and safety codes are adopted to preserve public health and safety and ensure the construction of safe and decent housing. These codes and standards also have the potential to increase the cost of housing construction or maintenance.

The City of Patterson has implemented several local amendments to the 2022 California Building Code to address local conditions and enhance public safety. One key modification is to Section 105.5 of the CBC, which extends the expiration of building permits to 180 days. If construction is not commenced or is suspended for this period, the permit becomes null and void, requiring reapplication at half the original fee, provided no changes have been made to the project plans. This ensures that projects maintain momentum while allowing flexibility for delays.

For flood-prone areas, Section 107.2.5.1 of the CBC has been amended to require that design flood elevations comply with the standards outlined in Title 17 of the Patterson Municipal Code. This local requirement strengthens Patterson's flood mitigation strategies and ensures alignment with municipal regulations.

In terms of temporary occupancy, Section 111.3 of the CBC now mandates that temporary occupancy permits can only be granted with the approval of the building official. Occupants, owners, and contractors must agree to correct any outstanding issues within 45 days, or the City has the authority to disconnect utilities until compliance is achieved.

Additionally, given the presence of expansive soils in the Patterson area, the City has amended Section 1808.6 of the CBC to impose stricter foundation design requirements. Foundations for buildings and structures must be engineered to either conform to Section 1808.6.1 (which outlines prescriptive measures for standard foundations) or 1808.6.2 (which allows for alternative designs based on a detailed soil analysis). This amendment ensures that buildings are constructed to withstand soil expansion and contraction, reducing the risk of structural damage.

Furthermore, the City has enhanced its stormwater management standards by amending Section 1803.7 to require drainage plans for all commercial, industrial, and multi-family residential developments. These plans must be approved by the Department of Public Works and include connections to publicly maintained storm drainage systems or ponding basins, as necessary. This amendment ensures that stormwater runoff is effectively managed, reducing the risk of flooding and environmental degradation.

The City Council has also been designated as the Board of Appeals under Section 113 of the CBC, offering a formal process for property owners and developers to contest decisions made by the building official. This appeals process provides a transparent, structured means of addressing disputes over code enforcement and interpretation.

These targeted amendments to the CBC reflect the City of Patterson's commitment to addressing local environmental challenges, such as seismic activity, expansive soils, and flood risks, while

promoting safe, sustainable development practices. Through these revisions, the City ensures that its building codes remain robust, relevant, and protective of public welfare. These local amendments to the CBC are not considered a constrain to development.

Code Enforcement

As previously discussed in Section 1.4, Housing Inventory and Market Characteristics, the enforcement of City building codes is managed by the building inspector, chief building official, and the city manager. The City prioritizes education in its code enforcement approach, and provides sufficient notice before issuing fines or scheduling hearings if necessary.

The City's Code Enforcement Division is not part of the Community Development Department, which can limit communication and coordination on housing-related code enforcement cases. Additionally, the City uses an antiquated permitting system, making it difficult to organize records and produce the Annual Progress Report (APR). To address these issues, the City proposes Program 1.13 which will implement new permitting software, such as iWorq or Accela, to streamline permit tracking and make permits publicly accessible on the Building Department webpage (see Chapter 3). The program also commits the City's Housing and Code Enforcement departments to attend regular meetings to share resources and support housing efforts. This initiative aims to improve internal communication and coordination to more effectively address housing needs in Patterson.

Housing for Persons with Disabilities

Land Use Controls

The City of Patterson permits residential care facilities in accordance with state law. However, the Municipal Code needs updating to clarify the permitting process based on licensure and facility size. A definition for residential care facilities is also needed to differentiate them from group care facilities, which operate for less than 24 hours per day. Program 4.3 proposes amending the Municipal Code to define residential care facilities and specify the permitting process for both licensed and unlicensed facilities, for six or fewer residents, and for seven or more residents.

Reasonable Accommodation

Building and development standards may constrain the ability of persons with disabilities to live in housing units that are suited to their needs. Applying the principle of reasonable accommodation, the City understands its affirmative duty to be flexible in the application of land use and zoning regulations, rules, and procedures for equal access to housing for people with disabilities. In 2015, the City amended its Zoning Ordinance to provide a procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the Fair Housing Laws in the application of zoning laws, building codes, and other land use regulations, policies and procedures (Chapter 18.89).

A request for reasonable accommodation may be made by any person with a disability or their representative, when the application of a requirement of this zoning code or other city requirement,

policy, or practice acts as a barrier to fair housing opportunities. Requests for reasonable accommodation are reviewed by the Director of Community Development Department or his/her designee, if no approval is sought other than the request for reasonable accommodation. A request for reasonable accommodation submitted for concurrent review with another discretionary land use application is reviewed by the Planning Commission. The review authority shall approve the request for a reasonable accommodation if, based upon all of the evidence presented, the following findings can be made:

A. Whether the housing in the request will be used by a person with a disability under the Acts;
B. Whether the request for reasonable accommodation is necessary to make specific housing available to a person with a disability under the Acts;
C. Whether the requested reasonable accommodation would impose an undue financial, administrative or enforcement burden on the city;
D. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a city program or law, including but not limited to land use and zoning;
E. Potential impact on surrounding uses;
F. Physical attributes of the property and structures; and
G. Other reasonable accommodations that may provide an equivalent level of benefit. (Ord. 783 (part), 2015).

Any person dissatisfied with any action of the Director of Community Development Department pertaining to a request for reasonable accommodation may appeal to the Planning Commission. Any person dissatisfied with any action of the Planning Commission pertaining to a request for reasonable accommodate may appeal to the City Council. The Municipal Code does not restrict who can appeal a request for reasonable accommodation, which could hinder approval if individuals unrelated to the request oppose it. To address potential obstacles in the approval and appeals process for requests for reasonable accommodation, the City has included Program 4.1 (see Chapter 3). This program proposes an amendment to Chapter 18.89, to limit the parties eligible to appeal a request for reasonable accommodation to the applicant or the personal beneficiary.

Definition of Family

Section 18.98.020 of the Patterson Municipal Code defines "family" as an individual or two or more persons living together in a dwelling unit as a single housekeeping unit. This definition of "family" is not overly restrictive to the occupancy of a housing unit.

Building Code

The City of Patterson has adopted the 2022 California Building Code and routinely adopts updates as they become available. The City has not adopted any local amendments to this code that would impede housing for persons with disabilities.

Planning and Development Fees

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City of Patterson relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed.

Planning Fees

State law requires that these fees be true cost recovery fees and do not exceed the cost to the City to review and process the permit. The City's fee schedule was last updated in August 2019. As part of fee schedule updates, the City reviews the staff time and other resources necessary to process permits to ensure that fees are set at an appropriate level in compliance with state requirements. Table 2-10 presents the planning and building fees for the City of Patterson. Standard building plan check and permit fees apply to all construction projects. These fees do not significantly add to the cost of market-rate or affordable housing being constructed in the city.

Table 2-10 Planning Entitlement and Building Fees, City of Patterson

Planning Entitlements	
Service	Fee
Tentative Parcel Map	$1,725[1]
Tentative Subdivision Map	$3,058.00
Tentative Subdivision Map Revision	$1,644.00
Final Map	$1,170.00
Similar Use Determination	$165.00
Rezone	$3,000.00
Relocation Permit	$875.00
Annexation	$6,000.00
Planned Development	$3,515.00
Planned Development/Rezone	$4,280.00
Minor Adjustment	$135.00
Master Plan	$3,190.00
Lot Line Adjustment	$800.00 [1]
General Plan Amendment	$4,275.00
General Plan Amendment with Rezone	$4,900.00
Zoning Ordinance Text Amendment	$3,900.00
Variance	Residential - $975.00 Non-residential - $1,760.00

Planning Entitlements	
Service	**Fee**
Time Extension	Staff - $210.00 Council [2] - $580.00
Negative Declaration/Mitigated Negative Declaration	$2,916.75
Environmental Impact Report	$4,051.25
Environmental Document Pursuant to Certified Regulatory Program	$1,377.25
County Clerk Processing Fee	$57.00
Conditional Use Permit	$1,340.00
Conditional Use Permit Revision	$890.00
Administrative Use Review	$300.00
Architectural and Site Plan Review	$2,265.00
Appeal	$605.00
Home Occupation Use Permit	$185.00
Temporary Use Permit	$225.00
Temporary Sign Permit	$55.00
Sign Permit	Single - $100.00 Multiple - $240.00 Master Plan - $595.00
Building Fees	
Service	**Fee**
Building Permit	Gross Area x Square Foot Construction Cost x 0.0075 (permit fee multiplier)
Plan Check	65% of calculated building permit fee [3]

SOURCE: City of Patterson, 2024
NOTES: 1 Additional fees, including engineering, final map, and environmental may be required during processing of application.
2 Requiring a public hearing.
3 Plan check fee is 65% of the calculated building permit fee (excluding fire sprinkler permits). Expedited Plan Check Fee is double the calculated plan check fee based on 65% of the building permit fee.

Development Impact Fees

Until 1978, property taxes were the primary revenue source for financing infrastructure and improvements to support new residential development. However, Proposition 13, passed in 1978, limited the ability of local jurisdictions to raise property taxes and significantly reduced the ad valorem tax rate. This change increased reliance on alternative funding sources, such as development impact fees, which are used to fund improvements like water and sewer facilities, parks, and transportation. To enact an impact fee, state law requires that a local jurisdiction demonstrate a "nexus" between the development and the impact being mitigated by the fee, and the fee must be proportional to the development's impact. Despite their necessity, development impact fees have become a significant cost factor in housing development.

The City's development impact fees were last updated in 2006, and intentionally maintained at those levels to support development during and following the Great Recession. To address inflation and evolving needs, the City conducted a comprehensive development impact fee nexus study in Fall 2024, culminating in the adoption of updated fees in October 2024 per Resolution 2024-59.

Table 2-11 outlines the 2021 development impact fees required by the City and local agencies for residential projects, which are assessed on a per-unit basis depending on whether the project is single-family or multi-family. Table 2-12 shows the total fee estimates for both single-family and multi-family dwelling units on a per unit basis. Building valuation is based on the highest estimated residential construction cost published in the ICC Building Valuation Data (August 2024), ensuring a conservative estimate for valuation and total development fee calculations.

Table 2-11 Residential Development Impact Fees, City of Patterson

Impact Fees	Fee Amounts (Per Dwelling Unit)		
	Single-Family	Multi-Family	Accessory Dwelling/Secondary Unit
Sewer Connection	$7,306.00	$6,210.00	$384.00
Water Connection	$12,109.00	$7,266.00	$637.00
Water Meter	$437.00	$437.00	$437.00
Storm Water Drainage	$2,875.00	$2,875.00	$1.19/sq ft
Police Services	$70.00	$70.00	ADUs less than 750 sq ft $0. See note.[1]
Subtotal	$22,797.00	$16,858.00	$2,349.31 (ADUs less than 750 sq ft)
Community Facilities			
General Government - City Hall	$342.00		ADUs less than 750 sq ft $0. See note.[1]
General Government - Corp Yard	$731.00		
Community Facilities	$6,429.00		
Street Improvements	$3,879.00		
I-5 Interchange	$43.00		
Subtotal	$11,424.00		-
Regional Fees			
County Public Facility - Multiple Family	-	$4,643.00	ADUs less than 750 sq ft $0. See note.[1]
School	$5.38/sq ft	$5.38/sq ft	$5.38/sq ft
Services	$607.00	$607.00	ADUs less than 750 sq ft $0. See note.[1]
Strong Motion	Building Permit Valuation x 0.0001	Building Permit Valuation x 0.0001	

SOURCE: City of Patterson, Estimated Development Fee Schedule, Effective January 1, 2021

NOTES: 1 ADUs less than 750 sq ft are exempt from incurring impact fees from local agencies, special districts, and water corporations. If an ADU is 750 sq ft or larger, impact fees shall be charged proportionately in relation to the square footage of the ADU to the square footage of the primary dwelling units (HCD Accessory Dwelling Unit Handbook, July 22).

2 Subdivisions pay Quimby Fee in lieu of land dedication, plus Mitigation Fee Act fee for park improvements.

3 Infill developments pay Mitigation Fee Act fee for land acquisition, plus Mitigation Fee Act fee for park improvements.

Table 2-12 Example of Total Residential Development Impact Fees (2021), City of Patterson

Development Fees	Single-family*	Multi-family**
Planning and Building Department Fees		
Site Plan Approval	$2,265.00	$2,265.00
Building Permit	$3,213.08	$1,341.66
Plan Check	$2,088.50	$872.08
Subtotal	$7,566.58	$4,478.74
Impact Fees		
Sewer Connection	$7,306.00	$6,210.00
Water Meter	$437.00	$437.00
Water Connection	$12,109.00	$7,266.00
Stormwater	$2,875.00	$2,875.00
Police Services	$70.00	$70.00
City Hall	$342.00	$342.00
Corp Yard	$731.00	$731.00
Community Facilities	$6,429.00	$6,429.00
Street Improvements	$3,879.00	$3,879.00
I-5 Interchange	$43.00	$43.00
Subtotal	$34,221.00	$28,282.00
Regional Fees		
School District	$8,070.00	$5,111.00
County Public Facilities	-	$4,643.00
Services	$607.00	$607.00
Strong Motion	$42.84	$17.89
Subtotal	$8,719.84	$10,378.89
Total	$50,507.42	$43,139.63

SOURCE: City of Patterson Development Fee Schedule effective January 1, 2021

NOTES: Building valuation is based on the highest construction cost for residential uses as published in the ICC Building Valuation Data for August 2024.

* Assumes a 1,500 sq. ft. single-family unit.

** Assumes a 950 sq. ft. multi-family unit.

Table 2-13 provides a comparison of these total fees between the City of Patterson and nearby jurisdictions. Patterson has the highest total fees for single-family and multi-family dwellings among nearby jurisdictions, primarily due to community facility fees. These fees are essential for funding new development and creating vital amenities such as parks, city hall, a community center, a senior center, an aquatics center, and a sports complex. Because Patterson is located farther from neighboring cities, it is crucial to develop these amenities locally to ensure residents have convenient access to recreational, social, and civic opportunities. The added cost is a necessary investment that directly enhances the quality of life, fostering a vibrant, active, and connected community.

Note that City of Modesto fees do not include school district impact fees or county public facilities fees, which would raise the total fees charged in the city.

Table 2-13 Total Fee Comparisons with Nearby Jurisdictions

Jurisdiction	Single-Family	Multi-Family
Patterson	$50,507.42	$43,139.63
Newman	$41,042.74	$24,880.67
Ceres	$38,027.15	$27,787.22
Modesto	$30,720.00[1]	$23,157.00[1]
Turlock	$30,582.00	$21,812.00
Stanislaus County	$24,038.00[2]	$24,147.00[2]

SOURCE: City of Modesto Adopted Housing Element 2031-2031 (December 2023); City of Ceres Revised Draft Housing Element 2023-2031 (July 2024); City of Newman Revised Draft Housing Element 2023-2031 (July 2024).
NOTES: Amounts refer to per unit cost.
1 Total fees do not include School District Impact Fee, $4.79 per square foot through June 2020 or County Public Facilities Fee.
2 Includes Use Permit and Admin Charge fees in addition to development impact fees.

Local Processing and Permit Procedures

Local processing and permit procedures can pose a considerable constraint to the production and improvement of housing. Common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval. These constraints increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer.

Residential Permit Processing

Processing and permit procedures and applications are available on the City's website.[7] The review and entitlement process is initiated by the submission of an application. Within 30 days of receipt of an application, the Planning Director makes a determination of completeness. After acceptance of a complete application, the project is reviewed in accordance with the environmental review procedures of the California Environmental Quality Act (CEQA). Public hearings are required to

[7] https://pattersonca.gov/139/Applications-Forms

consider all applications for a CUP, variance, architectural and site plan review, alteration permit, planned development, master plan, specific plan, zoning code and map amendment, prezoning, development agreement, and general plan amendment.

Approval Authorities

The City's Planning Director, Planning Commission, and City Council are the approval authorities for residential development projects. The Planning Director conducts an initial review of an application for residential development and provides a recommendation for architectural and site plan review to the Planning Commission.

The Planning Director is also the approval authority for administrative use reviews to evaluate and determine requests for uses and activities that may have minor impacts on adjacent properties and require specific site considerations. This review applies to duplexes. The Director's decision is based on criteria set forth in the zoning code, and the determination is accompanied by written findings. To approve an application, the director must find that the proposed use is permitted within the zoning district, the site is suitable for the use in terms of access, utilities, and physical constraints, and that the approval will not be detrimental to the public or surrounding properties. If the findings are met, the director may impose conditions to ensure the project complies with applicable standards and regulations. The administrative use review process is relatively minor, with clear and objective approval findings, making it an efficient and non-constraining procedure for the development of duplexes. The Planning Commission has the final approval authority for applications for a CUP, variance, alteration permit, and architectural and site plan review. Applications for planned development, master plans, specific plans, zoning ordinance and map amendments, prezoning, development agreements, and general plan amendments are reviewed by the Planning Commission, which then provides a recommendation to the City Council. The City Council has the final approval authority for these types of applications.

When a proposed project requires more than one permit with more than one approval authority, all project permits are processed concurrently and final action is taken by the highest-level designated approval authority for all such requested permits. Projects that require legislative approvals (e.g., zoning code and map amendment, general plan amendment) may go to the City Council as stand-alone items with the associated quasi-judicial approvals stopping at the Planning Commission.

Findings of Approval

As provided in Municipal Code Chapter 18.18.040E, findings of approval for architectural and site plan review of residential projects include the following:

1. The architectural and general appearance of the structures and grounds shall have architectural unity and be in keeping with the character of the neighborhood as not to be detrimental to the orderly and harmonious development of the city, or to the desirability of investment or occupation in the neighborhood.

2. The site plan is consistent with this title, any applicable specific plan, any adopted development standards and design guidelines, and the general plan. (Ord. 738 § 1 (Exh. A) (part), 2013).

The required finding stating that "The architectural and general appearance of the structures and grounds shall have architectural unity and be in keeping with the character of the neighborhood so as not to be detrimental to the orderly and harmonious development of the city, or to the desirability of investment or occupation in the neighborhood" introduces subjectivity. As a result, it is proposed for removal to enhance approval certainty for multi-family residential development. This action is included in Program 1.10, which aims to eliminate barriers to multi-family residential development in Patterson.

Appeals

Section 18.14.070 of the Patterson Zoning Ordinance states that any interested person may appeal certain actions of the Planning Director or Planning Commission made pursuant to this division to the designated appeal authority within 10 days from the date of action. However, actions by the City Council are final and no further administrative appeals are available. The Planning Commission is the appeal authority for actions made by the Planning Director, and the City Council is the appeal authority for actions made by the Planning Commission.

Typical Processing Times

Processing times for development review vary, based on the size of the project and the extent of environmental review required, and can range from six months to more than one year if an EIR is required. When an application is submitted, it is reviewed within 30 days to verify that it is complete or the applicant is notified that it is incomplete. After acceptance of a complete application, the project is reviewed in accordance with the environmental review procedures of the California Environmental Quality Act (CEQA) within 30 days. Typical processing times for complete applications are outlined in Table 2-14. These timeframes vary for single-family and multi-family projects. Single-family projects are typically processed in about one month, whereas multi-family projects are typically processed in about four to six months, unless delayed by environmental review due to significant environmental impacts.

Table 2-14 Typical Permit Processing Times

Development Type	Land Use Entitlement	Architecture Review	Building Permit Issuance
Single-Family Dwelling	30-45 days	30-45 days	5-6 months
Multi-Family Dwelling	4-6 months	4-6 months	12-15 months
Mixed-Use Residential and Commercial	30-45 days	30-45 days	12-15 months

SOURCE: City of Patterson, 2024

Permit processing for large annexation projects can take years and involve extended timelines, for a number of reasons. Annexations are contingent upon Local Agency Formation Commission (LAFCO) approval and may require elections. Other variables include agricultural land impacts; sphere of influence amendments and municipal service reviews; processing applications through LAFCO; if the annexation is City or landowner-initiated; preparation of planning documents and environmental impact reports; infrastructure analysis; coordination with neighboring public agencies; the number of landowners; public review and outreach; impacts to City finances; negotiation of development agreements; and litigation. Many of these factors can also apply to large subdivision projects which result in extended timelines. The Baldwin Ranch North subdivision, which was already within City limits, was processed within approximately two years (2021–2023). Planning permits were approved in 2023, followed by the issuance of building permits in less than six months. Currently under development, Baldwin Ranch North is a typical processing timeline for large subdivisions within City limits. Part of the Baldwin Ranch North project application also included a development agreement between the developer and the City.

New Housing Element law now also requires an examination of the length of time between receiving approval for a housing development and submittal of an application for building permits. The time between application approval and building permit issuance is influenced by a number of factors, none of which are directly impacted by the City. Factors that may impact the timing of building permit issuance include: required technical or engineering studies; completion of construction drawings and detailed site and landscape design; securing construction and permanent financing; and retention of a building contractor and subcontractors.

The majority of residential permits in Patterson are for single-family homes, with building permit issuance generally taking five to six months after planning approvals. Issuance of building permits for multi-family, mixed-use residential and commercial projects typically take as long as year to 15 months due to project scale.

Environmental Review

Environmental review in compliance with the California Environmental Quality Act (CEQA) is required for all discretionary development projects, including housing projects. The City complies with the timelines required by CEQA, including timelines for exempt projects per California Code of Regulations, title 14, section 15100-15112. An EIR is required of all developments that have the potential to create significant unavoidable impacts that cannot be mitigated.

Table 2-15, Permit Streamlining Act – Processing Times, outlines the City's compliance with the Permit Streamlining Act. The Negative Declaration process typically takes three to six months to complete, depending on staffing levels. Categorically Exempt developments such as ADUs require minimal amount of time. As a result, State-mandated environmental review does not pose a significant constraint to housing development.

Table 2-15 Permit Streamlining Act – Processing Times

Application	Final Authority	Processing Time
Subdivision Parcel Map (Tentative)	Planning Commission and City Council	40-45 days
Subdivision Parcel Map (Final)	City Council	21 days
Tentative Subdivision Tract Map	Planning Commission and City Council	3-6 months
Subdivision Tract Map (Final)	City Council	1-4 months
Negative Declaration	Planning Commission or City Council	3-6 months
Environmental Impact Report	City Council	16 months or more

SOURCE: City of Patterson, 2024

On/Off-Site Improvements

The City mandates both on-site and off-site improvements for all residential projects, which include the installation of curbs, gutters, drainage systems, sidewalks, paved streets, landscaping, and access to water and sewer services. These improvements are required either as part of the subdivision map approval process or, where no map is required, as a condition of the building permit. These measures are implemented to safeguard public health, safety, and welfare.

Curbs, gutters, and drainage systems are essential for managing stormwater and runoff within residential areas, while paved streets ensure all-weather accessibility, enhance drainage, minimize dust, and improve traffic safety. Arterials, expressways, and collectors are outlined in the general plan based on existing and projected traffic demands. Developers are responsible for the construction of roadways related to their projects and must contribute to regional transportation improvements through the payment of Street Improvement Impact Fees.

Sidewalks are essential for safe pedestrian movement, particularly for school-aged children, and are a key indicator of healthy, walkable communities. Additionally, landscaping is required in all zoning districts, with residential areas requiring at least 30 percent of the site to be landscaped. Landscaping typically includes trees, shrubs, grass, and decorative masonry walls, contributing to a more visually appealing and environmentally sustainable urban environment, while also aiding in erosion control, particularly in hillside areas. All landscaping must be installed by developers and approved prior to the occupancy of any buildings.

Connection to municipal water and sewer services is a prerequisite for tract map approval, providing essential infrastructure for potable water and waste disposal. These services are critical for supporting higher-density residential development.

City conditions are standard, objective, and aligned with the approved site plan or City standards as outlined in the Municipal Code.

Subdivision Required Improvements

Section 16.38.010 of the Patterson Municipal Code outlines the requirements for dedicating rights-of-way and easements in subdivisions. When a parcel or final map is filed, the subdivider must offer any streets, alleys, walkways, drainage channels, and other public-use areas for dedication to the city. If the property is dedicated for public purposes (excluding open space, parks, or schools), the city must record a certificate stating the subdivider's details and that the city will return the property if the need for it ceases. Additionally, the subdivider is responsible for providing the necessary rights-of-way and easements for both on-site and off-site streets and utilities, covering all related acquisition costs. This is typical practice and does not present a constraint to development.

Sections 16.40.010 and 16.40.020 of the Patterson Municipal Code address the requirements for oversizing and deferring improvements in subdivisions. For Oversizing of Improvements (16.40.010), the city can require the subdivider to install larger or additional improvements that benefit not only the subdivision but also nearby properties. These improvements must be dedicated to the public. If the city mandates such oversizing, it will reimburse the subdivider for the extra costs, including interest. To recover these costs, the city may charge other property owners or agencies benefiting from the improvements, contribute toward the cost from those benefiting properties, or establish local benefit districts to collect these charges. Requiring oversizing improvements can lead to higher upfront costs and delays for developers, as they are required to install larger infrastructure than necessary, with reimbursement often depending on a complex process. This is typical to ready the residential landscape for future adjacent residential development in the city. To reduce this potential constraint, the City is seeking federal and state funding to address the costs of residential infrastructure (Program 5.7, see Chapter 3).

As for Deferred Improvements (16.40.020), improvements required for a parcel map may be deferred with approval from the city engineer, especially when the property doesn't yet have an established use. This is also possible if the zoning district only requires improvements once a specific use is established on the property. Deferred improvements offer potential benefits by allowing developers to postpone infrastructure costs and construction until the property is ready for development, helping manage cash flow and reduce upfront expenses. However, this can also create uncertainty and potential delays for development, as developers may face unexpected costs or changes in infrastructure requirements when the property is eventually developed.

Key Factors Affecting On/Off-Site Improvement Costs

The cost and scope of on- and off-site improvements required for residential development projects can vary significantly, primarily based on project size and location. Projects located within the City's core, where existing infrastructure is readily available, generally require fewer improvements and can often connect directly to existing systems. These conditions result in shorter development timelines and lower overall costs. In contrast, projects located in areas with limited or no existing infrastructure require extensive improvements to support new development. These projects face

longer timelines, higher costs, and necessitate financing from developers due to the need to construct major infrastructure components such as water, sewer, electrical, and roadway systems.

For example, the Villages of Patterson, a project currently in the planning phase and located in the northeastern quadrant of the city, is situated near substantial existing infrastructure. This proximity allows the development to connect to existing systems, reducing the need for major new improvements. Preliminary estimates from an engineering firm place the cost of required improvements for this project at approximately $80,000 to $90,000 per lot. Conversely, development in recently annexed or otherwise undeveloped areas without existing infrastructure is expected to incur significantly higher costs, necessitating financing from developers to provide infrastructure to support residential use. The City is also committed to pursuing funding to offset costs where significant new infrastructure is needed, particularly potable water as demonstrated in Program 1.14 and Program 1.15 (see Chapter 3).

While the requirements for on- and off-site improvements contribute to the overall development cost, they are imperative to ensure vital infrastructure services to residents.

Inclusionary Housing Program

Inclusionary housing describes a local government requirement that a specified percentage of new housing units be reserved for, and affordable to, lower and moderate-income households. The goal of inclusionary housing programs is to increase the supply of affordable housing commensurate with new market-rate development in a jurisdiction. This can result in improved regional jobs-housing balances and foster greater economic and racial integration within a community. The policy is most effective in areas experiencing a strong demand for housing.

The City of Patterson adopted an Inclusionary Housing Program (IHP) to expand affordable housing options in Patterson (Patterson Zoning Ordinance Chapter 18.86). Patterson's IHP requires at least 15 percent of all newly constructed dwelling units in a residential project be developed, offered to, and sold or rented to very low-, low-, and moderate-income households at an affordable housing cost according to Section 18.86.030 of the Zoning Ordinance.

Further, the IHP requires affordable units to be constructed on site not later than the related market-rate units, unless one of the alternative actions set forth in Section 18.86.060 is performed. The proposed alternative action requires Planning Commission approval. Alternative actions set forth in Section 18.86.060 include the following:

- Off-Site Housing: In the event that on-site inclusionary housing is infeasible, upon application of the developer and at the discretion of the planning commission, the developer may satisfy the requirements of providing inclusionary units as part of the residential development, in whole or in part, by constructing or substantially rehabilitating units equal to or greater than the required inclusionary units at a site different than the site of the residential development;

- Dedication of Land for Housing: In the event that on- or off-site inclusionary housing is infeasible, upon application of the developer and at the discretion of the planning commission, the developer may satisfy the requirement of providing inclusionary units as part of the residential development, in whole or in part, by a conveyance of land to the city for the construction of the required inclusionary units; and
- Payment of an In-Lieu Fee: In exceptional cases where the developer finds on-site inclusionary housing, off-site inclusionary housing, or the dedication of land is infeasible, upon application of the developer, and at the discretion of the planning commission, a fee in lieu of all or some of the inclusionary units may be paid by the developer.

Affirmatively Furthering Fair Housing

Assembly Bill 686 (AB 686), signed in 2018, establishes an independent state mandate that expands the duty of all California's public agencies to affirmatively further fair housing (AFFH). Importantly, AB 686 also creates new housing element requirements applying to all housing elements due to be revised on or after January 1, 2021. These requirements include an assessment of fair housing practices, an analysis of the relationship between available sites and areas of high or low resources, and concrete actions in the form of programs to affirmatively further fair housing. The purpose of this assessment and analysis is to replace segregated living patterns with truly integrated and balanced living patterns and to transform racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity. A comprehensive assessment of fair housing required by AB 686 is found in Appendix A.

2.2 Non-Governmental Constraints

Non-governmental constraints are primarily market-driven and generally outside the direct control of local governments. Some impacts of non-governmental or market constraints can be offset to a minimal extent by local governmental actions, but usually the effects are very localized and have little influence on the total housing need within the jurisdiction or market area. Non-governmental constraints to affordable housing in Patterson consist of four major factors: price of land, availability of financing, cost of construction/availability of labor, and jobs/housing balance.

Economic Factors

The City has a limited ability to influence these factors. Land costs are impacted by the number of adequate sites that are available. Regional demand and costs have a great impact on land costs. Construction and financing costs are also determined at the regional, state, and national levels by a variety of private and public actions, which are not controlled by the City.

The major barrier to providing housing for all economic segments of the community concerns the nature of the housing market itself. Development costs have risen to the point where building housing affordable to all economic segments of the community is difficult to achieve in California.

Housing Market Conditions

Construction activities during the 5th Cycle Housing Element (2015 to 2023) were deeply affected by the COVID 19 Pandemic. Construction activities came to a standstill due to quarantine mandates and increasing labor and supply costs. The City is only beginning to see renewed interest in development recently.

Requests to Develop at Densities Below Those Permitted

New State Housing Element law now requires the non-governmental constraints analysis to evaluate developer requests to build at densities below the density identified in the Housing Element sites inventory. In order to incentivize development which better implements densities planned in the Housing Element sites inventory, the Housing Element sets forth Program 1.1 to ensure that there are adequate sites available throughout the planning period to accommodate the City's RHNA (see Chapter 3). The City has not received requests to develop at densities below assumptions in the housing sites inventory.

Construction Labor Shortage and Construction Costs

Construction costs are primarily driven by the prices of materials and labor. California faces a shortage of 200,000 construction workers needed to meet Governor Newsom's housing goals, according to a new study by Smart Cities Prevail. This study reveals that California has lost approximately 200,000 construction workers since 2006, many of whom lost their jobs during the 2008 recession and subsequently found employment in other industries. Gary Painter, a housing economist at the University of Southern California (USC), states that California has "a shortage of construction workers at the price people want to pay." The challenge is that increasing wages for construction workers would raise overall housing construction costs. Consequently, some developers are "importing" workers from out of state and covering their temporary housing expenses during construction periods.

Another cost component is the cost of materials, which varies depending on the type of unit being built and the quality of the product being produced. Construction material costs are influenced by regional and national factors, which rarely hinder housing development in specific localities. However, material and labor costs have dramatically increased in recent years, particularly following the COVID-19 pandemic.

One indicator of construction costs is Building Valuation Data, compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not account for regional differences, nor include the price of the land upon which the building is built. The Building Valuation Data, dated August 2024, reports the national average for development costs per square foot for apartments and single-family homes as follows:

- Residential Multifamily: $149.80 to $223.61 per square foot;
- Residential One- and Two-Family Dwelling: $167.37 to $211.77 per square foot; and
- Residential Care/Assisted Living Facilities: $189.67 to $264.93 per square foot.

It should be noted that California building costs tend to be higher than national levels.

Land Costs

The cost of land is a significant contributor to the overall cost of housing. Land values fluctuate with market conditions and have generally been increasing since the 2008 Great Recession, and substantially increasing since 2012. Land prices are determined by numerous factors, most important of which are land availability and permitted development densities. As land becomes less available, the price of land increases.

The price of land varies depending on a number of factors, including size, location, the number of units allowed on the property, and access to utilities. Table 2-16 presents vacant land sales from January 2023 through May 2024 in Patterson, shown by cost and acreage. The price ranges from $0.02 to $14.10 per square foot, with an average price of $2.77 per square foot. The City has little control over land costs, which can pose a constraint to development.

Table 2-16 Vacant Lot Sales, Patterson (2023-2024)

Acreage	Land Cost	Cost Per Square Foot	Date Sold
6.15	$550,000	$2.05	5/24/2024
0.508	$73,000	$3.30	12/18/2023
0.549	$41,000	$1.71	12/13/2023
0.531	$42,420	$1.83	12/12/2023
0.49	$50,000	$2.34	12/12/2023
2.8	$63,000	$0.52	12/07/2023
0.53	$63,000	$2.73	12/07/2023
0.53	$63,000	$2.73	12/07/2023
0.92	$90,000	$2.25	10/25/2023
0.47	$50,000	$2.44	10/16/2023
0.94	$68,000	$1.66	08/18/2023
-	$580,000	-	08/08/2023
18.5	$1M	$1.24	06/07/2023
-	$463,850	-	05/31/2023
0.7	$196,000	$6.43	05/15/2023

Acreage	Land Cost	Cost Per Square Foot	Date Sold
6,187	$4.05M	$0.02	03/29/2023
0.57	$350,000	$14.10	03/16/2023
0.46	$50,000	$2.50	02/14/2023
-	$520,000	-	02/10/2023
164.15	$2.20M	$0.31	01/31/2023
6	$450,000	$1.72	01/24/2023

SOURCE: Zillow, 2024

Availability of Home Financing

The availability of financing can affect a person's ability to purchase or improve a home and influences the demand and improvement of ownership housing. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing, whether financed at market rate or with federal government assistance. Locally assisted mortgages (such as first-time homebuyer programs) are not subject to HMDA reporting.

In May 2024, Freddie Mac's primary mortgage market survey listed interest rates on home loans at 7.03 percent on a 30-year fixed loan rate. The interest rate has increased steadily over the past three years. In June 2023, the interest rate for a 30-year fixed loan was 6.79 percent. Low housing inventory can create competition among potential homebuyers, especially for first-time homebuyers. The sales price of housing is typically adjusted for changes in mortgage rates.

Table 2-17 summarizes the outcomes of loan applications submitted to financial institutions in Patterson in 2023, covering home purchase, refinance, and home improvement loans. The table includes data on loans that were originated (approved), approved but not accepted, denied, and withdrawn or closed due to incomplete information.

The housing crisis is often attributed to the relaxation of mortgage underwriting criteria, which allowed households to secure loans beyond their long-term affordability. Any income reduction, such as layoffs or reduced work hours, led to loan defaults. Currently, lenders report that capital is available for highly qualified buyers, but the limited housing inventory and low buyer confidence continue to slow the housing market recovery.

In 2023, a total of 708 households applied for a loan to purchase a home, refinance, or for home improvements. A total of 142 households applied for government-backed loans (e.g., FHA, VA), resulting in a 61.3 percent approval rate and a 9.9 percent denial rate. For conventional loans, 256

households in applied, with a 64.5 percent approval rate and an 8.2 percent denial rate. Additionally, 32.4 percent of loan applications were for refinancing, and 11 percent were for home improvements.

Table 2-17 Mortgage Lending Approval Rates (2023), City of Patterson

Loan Type	Total Applicants	Loans Originated		Approved Not Accepted		Applications Denied		Withdrawn or Incomplete	
Government Backed Purchase	142	87	61.3%	3	2.1%	14	9.9%	38	26.8%
Conventional Purchase	256	165	64.5%	12	4.7%	21	8.2%	58	22.7%
Refinance	230	98	42.6%	6	2.6%	38	16.5%	88	38.3%
Home Improvement	80	33	41.3%	3	3.8%	36	45.0%	8	10.0%
Total	708	383	54.1%	24	3.4%	109	15.4%	192	27.1%

SOURCE: FFIEC Home Mortgage Disclosure Act MSA/MD Aggregate Reports-- Disposition of loan applications, by location of property and type of loan, 2023.
Note: This dataset is the sum of the loan applications for Tracts 32.01, 32.03, 32.04, 32.05, 32.06, and 33.

The higher approval rates suggest that financial institutions are willing to lend, particularly to highly qualified buyers. However, the presence of denial rates (8.2 percent for conventional and 9.9 percent for government-backed loans) shows that some applicants still struggle to meet lending criteria, possibly due to credit issues or insufficient income. Thirty-two percent of loan applications for refinancing indicates that a significant number of homeowners may be seeking to take advantage of favorable interest rates to lower their monthly payments or consolidate debt. An 11 percent application rate for home improvement loans suggests ongoing investment in existing homes, which may reflect confidence among homeowners in the local housing market. Overall, these patterns highlight that while there is access to financing for qualified individuals, barriers still exist for some, and the limited housing inventory, combined with cautious buyer sentiment, continues to influence the market dynamics in Patterson.

2.3 Environmental Constraints

Environmental hazards affecting housing units include seismic hazards, flooding, toxic and hazardous waste, fire hazards and noise. The following hazards may impact future development of residential units in the city. The following assessment of environmental constraints, including seismic hazards, flooding, and fire rely the 2022-2027 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, incorporated herein by reference.

Seismic Hazards

The City of Patterson and its surrounding areas experience lower-than-average earthquake activity compared to the rest of California. The Great Valley Thrust Fault System, part of the Ortigalita

Fault Zone and designated as an Alquist-Priolo Earthquake Fault Zone, lies along Patterson's western boundary. Although this fault hasn't been active historically, future activity cannot be ruled out. The San Joaquin Fault, 15 miles south of Patterson but extending through its western area, is also nearby. Other regional faults include the highly active San Andreas Fault, the Hayward Fault, and the Patterson Pass Fault, the latter of which produced a 4.5 magnitude earthquake in 1946.

Since 1881, there has been no record of seismic activity originating within the City of Patterson itself; however, Stanislaus County has experienced shaking from earthquakes centered elsewhere. Documented earthquakes that affected the area occurred in 1872, 1906, 1952, 1966, 1984, 1989, and most recently in 2021, when a 6.0 magnitude earthquake centered in the Little Antelope Valley along the California/Nevada border was felt by residents. While the County has seen minor damage from these events, the 1906 Los Banos earthquake caused significant damage. Based on the mapped earthquake shaking potential for Stanislaus County and the City of Patterson, the proximity to the Great Valley Thrust Fault System, Ortigalita Fault Zone, and San Joaquin Fault, combined with the history of shaking without surface rupture, indicates that the probability of damaging seismic ground shaking in the City of Patterson is considered occasional. Potential geologic and soil hazards can be increased by inappropriate development, seismic activity and heavy rains.

Flooding

The primary flood risks in Stanislaus County that could affect the City of Patterson are riverine and local urban flooding, typically caused by severe weather and excessive rainfall, whether locally, upstream, or from winter snowmelt. Much of the central and northeastern areas of Patterson are within FEMA's Special Flood Hazard Area (SHFA) or 100-year floodplain, making flood risks and regulatory requirements critical considerations for future land use. Some areas of the City may also be prone to localized stormwater flooding during severe storms. The remainder of Patterson lies outside FEMA's 0.2 percent and 1 percent annual chance floodplains. Given Stanislaus County's flooding history, Patterson is considered likely to face future flood risks. According to the 2022-2027 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan,[8] a flood vulnerability assessment was completed in 2021, revealing the majority of properties fall within the 0.2 percent annual chance floodplains than 1 percent annual change floodplains.

Fire

Both urban and wildland fire conditions are present in Stanislaus County, increasing the risk of property damage, injury, and loss of life. While most of the County, including the City of Patterson, has low fuel loading, primarily consisting of crops and grasses, the far western and eastern portions contain undeveloped, rugged terrain with highly flammable grass, brush, and some pine. These areas, identified by CAL FIRE as State Responsibility Areas (SRAs), are ranked as moderate fuel hazards,

[8] https://www.stanoes.com/home/showpublisheddocument/484/638380927334470000

particularly in the region west of I-5. In the southwest quadrant of the City, west of Baldwin Road and south of Sperry Avenue, there is a small area designated as having a very high fire threat. However, there are no very high wildfire hazard severity zones within the city limits. While the city is adjacent to a very high wildfire threat area to the west, wildfire hazards are considered low priority and are addressed primarily for planning and awareness purposes.

Noise

Excessive noise can adversely affect human health and well-being, economic productivity, and property values, especially in areas where sensitive land uses such as senior housing, schools, childcare, and hospitals are located. Mobile and stationary noise sources contribute to overall noise levels, and the impacts of both must be analyzed when considering environmental effects of new development. Potentially significant sources of noise within the Patterson Planning Area include vehicular traffic, industrial-type uses such as the wastewater treatment plant. The City's general plan includes measures to mitigate potential noise impacts from development.

Radiological Hazards and Hazardous Materials

Regulations which govern the storage, use, transportation and disposal of radioactive materials are administered by the Radiological Health Branch of the California Department of Health Services. Section 6.40.010 of the City's Zoning Code defines hazardous materials as, "any substances or materials in a quantity or form which, in the determination of the fire chief of the city or his authorized representative, pose an unreasonable and imminent risk to the life, health or safety of persons or property or to the ecological balance of the environment, and shall include, but not be limited to, such substances as explosives, radioactive materials, petroleum or petroleum products or gases, poisons, etiologic (biologic) agents, flammables and corrosives."

The Zoning Ordinance currently allows heavy industrial activities in the Heavy Industrial (HI) Zoning District, located in the central region of the city east of Highway 33, and north of Zacharias Road west of Highway 33. The City's fire department is authorized to clean up or abate the effects of any hazardous materials deposited upon or into property or facilities of the city (Zoning Ordinance Section 6.40.020).

Agricultural and Open Space Lands

Williamson Act Contracts are voluntary and formed between a county or city and a landowner for the purpose of restricting specific parcels of land to agricultural or related open space use. Private land within locally-designated agricultural preserve areas are eligible for enrollment under a contract. The minimum term for contracts is ten years. However, since the contract term automatically renews on each anniversary date of the contract, the actual term is essentially indefinite. Landowners receive substantially reduced property tax assessments in return for enrollment under a Williamson Act contract. Property tax assessments of Williamson Act contracted land are based upon generated income as opposed to potential market value of the property.

According to the California Department of Conservation's Important Farmland Finder Map,[9] 11 parcels designated as Prime Farmland are enrolled in Williamson Act Contracts. Although future city growth will likely encroach on farmland, this will not pose a significant constraint on the provision of additional housing units during the planning period. No housing opportunity sites included in the site inventory have active Williamson Act Contracts.

2.4 Infrastructure Constraints

Water Supply

The City of Patterson Water Division provides water resources to city residents through pumping of groundwater from the Delta-Mendota Subbasin, which is the city's sole source of all potable water. This groundwater basin spans 747,000 acres across parts of Stanislaus, Merced, Madera, and Fresno County. The Delta-Mendota Subbasin is designated by the Department of Water Resources as a critically overdraft high priority basin.

In 2019, the City of Patterson became a Groundwater Sustainability Agency (GSA) within the Delta-Mendota Subbasin, joining seven other Groundwater Sustainability Agencies in the Northern and Central Delta-Mendota Region to develop a Groundwater Sustainability Plan (GSP) (hereinafter "plan").[10] The plan, mandated by the Sustainable Groundwater Management Act (SGMA), aims to achieve groundwater sustainability in the region by 2040. It addresses issues like overdraft and identifies projects and management actions to reduce reliance on groundwater, ensuring current and future demands are met sustainably.

The City operates seven deep underground water wells for drinking, three non-potable wells for irrigation, and three storage tanks all within three pressure zones. The City's Water Division is also responsible for maintenance and repairs on the city's water infrastructure, including 57 miles of water mains, 860 fire hydrants, 978 water valves, and 483 backflow prevention assemblies. All water services in the city are metered, for which meter reading is performed every month for over 6,600 active water accounts.

According to the City of Patterson's 2020 Urban Water Management Plan, actual water demand in 2020 was estimated at 4,454 acre-feet per year. Demand is projected to rise to 6,127 acre-feet per year by 2035 and 7,681 acre-feet per year by 2045.[11]

In March 2023, the Department of Water Resources (DWR) issued findings which determined that the six GSP's that had been submitted for the Delta-Mendota Subbasin were 'Inadequate' because it did not provide the necessary coordination of groundwater management required by SGMA and

[9] https://maps.conservation.ca.gov/dlrp/WilliamsonAct/
[10] http://deltamendota.org/ncdm-gsp-review/
[11] City of Patterson, 2020 Urban Water Management Plan, Table 4-1 and Table 4-2.

DWR Regulations. As a result of the inadequacy determination, a coordination committee representing all 23 GSAs in the Delta-Mendota Subbasin prepared a new single GSP governing the entire subbasin. The new GSP was adopted by each of the GSPs, including the City, and submitted to DWR in December 2024 (GSP 2024). Under the 2024 GSP, there is a pumping reduction plan in effect which requires the City to reduce its groundwater pumping to 2,626 acre-feet per year by 2030.

The City's Public Works Department, with support from a dedicated consultant team, is actively addressing existing overdraft and future water demand to ensure that residential development needed to meet RHNA goals is not hindered. To this end, the City is aggressively pursuing multiple projects to diversify its water supply and resolve supply issues by mid-cycle. In addition to diversifying water sources, the City is implementing conservation efforts, including conservation agreements for new development, to reduce groundwater pumping and ensure responsible water use in line with required reductions. To further address water supply challenges, the City is actively seeking funding opportunities, such as Proposition 4 funds, State Revolving Loan Funds, and congressional support, having recently secured $10 million in funding.

Despite the groundwater pumping reduction plan, the City intends to support residential development through the construction and implementation of water infrastructure projects, such as the Del Puerto Creek Capture and Recharge Project, which was included as part of the Master Plan. The City has identified and is exploring multiple options to support planned and future development, while remaining in compliance with the 2024 GSP. These options include:

1. Requiring water demand from future development to be offset by the purchase of surface water which will be diverted for recharge in the Del Puerto Creek Project basins;

2. Applying for the Bureau of Reclamation WaterSMART grant to fund project design of the Del Puerto Creek Project;

3. Upon completion of the Del Puerto Creek Project, the City will recharge the total amount of purchased and delivered surface water to meet the increase in water demand as a result of development projects;

4. The City will require development projects with potable water demand to contribute to funding for an evaluation of a redesign of the existing storm water infrastructure associated with the Black Gulch Drainage Area. This project will redesign the existing system to capture storm water for recharge rather than discharge to Salado Creek. This will address the City's use of the upper and lower aquifers for water supply;

5. The City will work with neighboring agencies to maximize beneficial use of stormwater to develop a regional solution for recharge consistent with SGMA;

6. Implement a recycled water program; and

7. Prioritize conservation.

Wastewater

The City of Patterson Water Quality Control Facility is responsible for the operation, maintenance, and repair of the city's wastewater treatment plant. The City collects and treats all wastewater within its limits at its Water Quality Control Facility, which also serves Diablo Grande, a community about six miles west of the City. Wastewater is transported via a gravity system to the treatment plant, located approximately 2.5 miles east of the city on Poplar Avenue near the San Joaquin River.

The treatment plant covers approximately 240 acres and has a design capacity of 2.25 million gallons per day. Approximately 1.8 million gallons per day of wastewater are treated daily. In 2020, the Water Quality Control Facility received about 1,793 acre-feet per year (AFY) of influent, representing the current potential for recycled water.

The City's wastewater treatment plant currently does not produce recycled water, nor does it import recycled water from neighboring agencies. As part of its Water Management Plan, the City will develop a recycled water program for non-potable irrigation needs, which will involve upgrading the Water Quality Control Facility to comply with Title 22 and connecting the Water Quality Control Facility outlet to the non-potable pipe network.

The Urban Water Management Plan notes that recent conservation efforts by the City have reduced flows, resulting in no significant capacity issues at present. As a result, wastewater infrastructure availability is not expected to be a constraint on residential development during the 6th Cycle planning period.

Public Transportation

The Stanislaus Regional Transit Authority (StanRTA) operates two key bus routes serving Patterson: Route 45, connecting to Newman and Turlock, and Route 40, providing access to Modesto. The BART Commuter Bus also links Patterson to Turlock and the Pleasanton BART station. In March 2023, StanRTA introduced service enhancements, including Sunday service on Routes 40 and 45, 60-minute service intervals, and additional bus stops in Patterson, improving connections to retail, education, and healthcare facilities. All bus stops and the commuter are central to the downtown area of the city. To support residential development on both the west and east sides of State Route 33, the City Mayor and City Manager hold regular meetings with StanRTA to discuss potential enhancements to existing routes and opportunities for system expansion.

Program 1.9 proposes strategies to support transportation demand management by enhancing access and promoting sustainable transit options (see Chapter 3). Key actions include collaborating with StanRTA to expand transportation access to the city's western and eastern regions, creating an

incentive program for developers to offer bike parking and transit passes for residents of new affordable housing, and providing accessible information on bus frequency and transit stop locations in common areas. These initiatives are further supported by reducing minimum parking standards to encourage the development of multifamily housing and promote alternative transportation modes.

Energy Conservation

The City Building Division enforces the State Energy Efficiency Standards for Residential and Nonresidential Buildings (Government Code Title 24, Part 6) and requires Title 24 calculations during plan check. The City adopted the California Green Building Standards Code, 2022 Edition, and supports the elimination of contamination in older buildings, such as lead-based paint and asbestos during rehabilitation and code compliance inspections. The City promotes resident participation in energy conservation programs, such as the Cash for Grass Rebate Program and the High Efficiency Toilet Rebate Program.

The Cash for Grass Rebate Program aims to permanently reduce the amount of water used for landscaping purposes. The City offers $1.00 for every square foot of turf removed and replaced with drought-resistant or water-efficient landscaping. The following rules apply:

- Rebates are available on a first-come, first-served basis. Only one rebate per household per fiscal year;
- A minimum of 200 square feet of turf must be removed, with a maximum of 2,000 square feet allowed;
- Only City of Patterson utility customers are eligible, and they must currently be maintaining their lawn;
- Dead lawns are not eligible; and
- For front yards only, the applicant must maintain at least 50 percent of the landscape in front of their home.

The High Efficiency Toilet Rebate Program involves replacing high-water-use toilets with low-flush toilets, which are estimated to save approximately 38 gallons of water each day. The rebate amount for a qualifying high-efficiency toilet (1.28 gallons per flush or less) is $100. The following rules apply:

- Rebates are available on a first-come, first-served basis, and only City of Patterson utility customers are eligible;
- The toilet being replaced must use more than 1.6 gallons per flush. Homes built before 1994 with original toilets may qualify for the program;
- Toilets must have been purchased after July 1, 2018; and

- If the toilet has already been replaced, you may still qualify for a rebate. The applicant must have the original receipt, and the new toilet must be 1.28 gallons per flush or less and Water Sense approved. A post-verification visit is required.

In addition to the rebate programs, the City offers free water-conserving fixtures. Replacing old plumbing fixtures can save hundreds of gallons a day and reduce water bills. As part of the City's Water Conservation Program, free low-flow bathroom and kitchen aerators, free showerheads, and free toilet leak detection tablets are available. The following rules apply:

- Supplies are limited and are available on a first-come, first-served basis;
- A post-verification visit may be required; and
- Only City of Patterson utility customers are eligible for this program.

In addition to City resources, local utility providers such as the Turlock Irrigation District and Pacific Gas and Electric offer additional rebate programs that assist lower-income households and support energy conservation goals. Table 2-18 identifies local assistance programs that offer incentives for energy conservation and assist low-income households. In addition to local assistance, several federal programs can help lower-income households pay their utility bills while also supporting the city's energy conservation goals. Table 2-19 outlines federally funded programs that offer incentives and subsidies to encourage energy conservation and assist low-income households.

The City disseminates information about energy conservation programs through informational flyers available at City offices and public buildings, announcements at City Council meetings, and links on the City's website. Energy conservation information and assistance programs are also featured in the City's quarterly newsletter.

Table 2-18 Programs and Incentives for Residential Properties in Stanislaus County

Program	Description
Turlock Irrigation District	
Rebate Programs	Turlock Irrigation District offers several rebate programs, including those for residential general improvements, appliances, heating and cooling, shade trees, and HVAC tune-ups.
Weatherization Program	TID's Weatherization program offers free weatherization measures and energy-efficient appliances to qualified low-income households. TID determines qualified households through a sliding income scale based on the size of a household. The program includes measures such as attic insulation, weather stripping, caulking, and minor home repairs. Some customers qualify for replacement of appliances including electric water heaters, air conditioners and evaporative coolers.
TID Cares Program	The TID Cares Program provides qualifying residential customers an $11 discount on their residential customer charge, as well as 15 percent off the first 800 kilowatt-hours (kWh) of use. Eligibility is dependent on several criteria listed online.[12]

[12] https://www.tid.org/customer-service/payment-assistance-programs/tid-cares-rate-assistance-program/

Program	Description
Pacific Gas & Electric	
Rebate Programs	PG&E offers rebates to homeowners who make improvements that reduce energy use, such as buying an energy-efficient dishwasher, refrigerator, or water heater or sealing and insulating ducts and attics.
California Alternate Rates for Energy (CARE)	Provides a 20 percent discount on energy rates for qualifying low- and fixed-income households and housing facilities. Qualifications are based on the number of people living in the home and total annual household income.
Family Electric Rate Assistance (FERA)	Helps eligible customers pay their energy bill. Income-qualified customers get an 18 percent monthly discount on electric rates. Participants must be a household with three or more people.
Relief for Energy Assistance through Community Help (REACH)	Provides an energy credit of up to $2,000 based on the past-due balance.
Low-Income Home Energy Assistance Program (LIHEAP)	Provides assistance with residential utility bill payment; emergency help with residential energy-related crisis, such as utility shutoff notices, energy-related life-threatening emergencies, and home weatherization.
Medical Baseline Program	Assists residential customers who depend on power for certain medical needs. The additional allotment of energy is roughly 500 kilowatt-hours (kWh) of electricity and/or 25 therms of gas per month. This amount depends on the customer's energy needs. These needs must be verified by a medical practitioner during certification.
Central Valley Opportunity Center	
Home Energy Assistance Program	The Home Energy Assistance Program provides one payment per year to utility companies for low-income individuals. TID customers apply through the Central Valley Opportunity Center. To be eligible, the individual must be a Stanislaus County resident and income must be at or below 130 percent of the poverty level per the Federal Register.
Energy Crisis Intervention Program	The Energy Crisis Intervention Program provides one payment per year to utility companies for low-income customers that have received a 48-hour Shut Off Notice or if a senior citizen or disabled person have received a 15-day Shut Off Notice. The program also assists customers in obtaining propane and firewood for heating and repair or replacement of heating sources. To be eligible, the individual must be a Stanislaus County resident and income must be at or below 130 percent of the poverty level per the Federal Register, in addition to having received a 48-hour Shut Off Notice or 15-day Shut Off Notice prior to application.
The Salvation Army	
Energy Assistance Program	The Salvation Army Energy Assistance Program provides financial assistance to qualified customers in TID's service territory. Qualified customers can receive up to $300 towards their TID bills. Selection and assistance granted is at the discretion of The Salvation Army.

Source: Turlock Irrigation District, 2024; Pacific Gas and Electric, 2024; Central Valley Opportunity Center, 2024.

Table 2-19 Federally Funded Programs and Incentives for Residential Properties

Program	Description
Low-Income Weatherization Program's (LIWP) Multifamily Energy and Efficiency and Renewables Program	Provides technical assistance and incentives for the installation of energy efficiency measures and solar photovoltaic systems in low-income multi-family dwellings serving priority populations.
Low-Income Home Energy Assistance Program (LIHEAP)	LIHEAP can offer a one-time payment to help pay heating or cooling bills or in an emergency or energy crisis, such as a utility disconnection. Additionally, LIHEAP can also provide in-home weatherization services for improved energy efficiency and health and safety.
Low-Income Weatherization Program's (LIWP) Farmworker Housing Energy Efficiency and Solar PV	Provides direct installation of energy efficiency measures and solar photovoltaic (PV) systems for eligible farmworker households at no cost.
Low-Income Household Water Assistance Program (LIHWAP)	LIHWAP offers one-time support to help low-income households pay past due or current residential water and sewer bills and keep their water on.

Source: California Department of Community Services and Development, 2024

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3.0
Housing Action Plan

This chapter describes housing goals, policies, and programs for the City of Patterson. A goal is defined as a general statement of the highest aspirations of the community. A policy is a course of action chosen from among many possible alternatives. It guides decision-making and provides a framework around which the housing programs operate. A program is a specific action that implements the policy and moves the community toward the achievement of its goals. Programs are a part of the City's action plan and constitute the City's local housing strategy.

Section 65583(b) of the State Government Code describes the requirements for the City's housing programs in the following areas:

- Provide adequate sites;
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households;
- Address governmental constraints;
- Conserve and improve the condition of the existing affordable housing stock;
- Promote equal housing opportunities; and
- Preserve units at-risk of converting to market rate.

3.1 Goals, Policies and Programs

The City is responsible for enabling the production of housing by reducing regulatory barriers, providing incentives, and supporting programs that create or preserve housing, especially for vulnerable populations. To enable the construction of quality housing, the City has identified five goals:

- Goal 1: Facilitate Housing Construction;
- Goal 2: Preserve and Improve the Existing Housing Stock;
- Goal 3: Exemplify Sustainable Development and Energy Conservation;
- Goal 4: Provide New Affordable and Other Special Needs Housing; and
- Goal 5: Publicize Housing Needs and Resources.

The policies for the 2023-2031 planning period are carried forward and modified from the 2015-2023 Housing Element as follows:

- **Policy H-1 Ensure Adequate and Diverse Housing Supply**: The City shall maintain an adequate supply of residentially zoned land at appropriate densities to accommodate current and future housing needs and ensure a diverse range of housing types.
- **Policy H-2 Promote Affordable Housing Development:** The City shall actively encourage the development of affordable housing for various income groups, prioritizing higher-density projects near transit, shopping, services, schools, and jobs.
- **Policy H-3 Conserve and Preserve Existing Affordable Housing:** The City shall strive to conserve and preserve the existing affordable housing stock, particularly rental units for lower- and moderate-income households.
- **Policy H-4 Support Housing for Special Needs and Vulnerable Populations**: The City shall prioritize housing development for extremely low-income households and special needs groups, including seniors, disabled persons, large families, farmworkers, and the homeless.
- **Policy H-5 Facilitate Streamlined and Efficient Development Processes:** The City shall promote timely, consistent, and predictable development procedures by streamlining the approval process for residential projects.
- **Policy H-6 Promote Sustainable and Energy-Efficient Housing:** The City shall promote sustainable housing practices by encouraging energy and water-efficient design and construction in new and existing residential developments.
- **Policy H-7 Protect and Stabilize Residential Neighborhoods:** The City shall protect residential neighborhoods from incompatible land uses and promote neighborhood revitalization.
- **Policy H-8 Promote Fair Housing and Equal Opportunity:** The City shall ensure equal housing opportunities for all residents, regardless of race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, disability, or source of income.
- **Policy H-9 Ensure Consistency with the General Plan:** The City shall ensure that the Housing Element is internally consistent with the other elements of the General Plan via zoning amendments or changes to the Municipal Code.

Policies and programs from the 2015-2023 Housing Element have been incorporated herein. As a result of the analysis of effectiveness in Appendix B, they have been updated, modified, or deleted as necessary to reflect accomplished programs, existing and projected needs, constraints, available resources, and changes necessary to comply with new state laws. Monitoring of program accomplishments will be conducted periodically through the Housing Element Annual Progress Report to the City Council and to the Housing and Community Development Department (HCD).

Quantified Objectives

Quantified Objectives estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period. The Quantified Objectives do not represent a ceiling on development, but rather set a target goal for the jurisdiction to achieve, based on needs, resources, and constraints. These objectives will focus communication between the City and HCD with future Annual Progress Reports (APRs). HCD does not demand that all objectives must be met, rather, it is a goal that enables objective assessments about program effectiveness so that the City may make informed determinations to continue, modify, or delete programs with the next Housing Element update cycle. Table 3-1 summarizes the number of units anticipated to be constructed as a result of the programs and capacity available for housing in Patterson.

Table 3-1 Quantified Objectives

Income Category	New Construction	Rehabilitation	Conservation/Preservation*
Extremely Low Income (<30% AMI)	572	12	127
Very Low Income (30-50% AMI)	572	12	127
Low Income (50-80% AMI)	822	24	-
Moderate Income (80-120% AMI)	593	8	-
Above Moderate Income (>120% AMI)	1,353	-	-
Total	3,912	56	254

SOURCE: City of Patterson, 2024

NOTE: *The California Housing Partnership Preservation Database reported 254 deed-restricted affordable units in Patterson, none of which are anticipated to expire until 2068 at the earliest.

Goal 1: Facilitate Housing Construction

Program 1.1 Provide Adequate Sites for RHNA and Monitoring of No Net Loss

For the 2023-2041 Housing Element planning period, the City of Patterson has been assigned a RHNA of 3,716 units, with the following income distribution: 1,046 very low-income, 724 low-income, 593 moderate-income, and 1,353 above moderate-income units. Due to an unaccommodated need of 196 lower-income units from the 5th Cycle Housing Element, the City's adjusted RHNA is 3,912 units, increasing the very low- and low-income RHNA by 98 units each. Based on projected ADUs, pipeline projects, and identified housing opportunity sites, the City has adequate capacity to meet its RHNA.

To ensure the City complies with SB 166 (No Net Loss), the City will monitor the consumption of residential, commercial, and mixed-use acreage to ensure an adequate inventory is available to meet

the City's RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will annually update and submit their Annual Progress Report (APR) to HCD. This will facilitate an ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction in capacity below the residential capacity needed to accommodate the remaining need for lower- and moderate-income households, the City will identify and if necessary, rezone sufficient sites to accommodate the shortfall and ensure no net loss in capacity to accommodate the RHNA.

Additionally, the City shall develop and maintain a database of all City-owned land, particularly surplus land, for opportunities to rezone, where appropriate, for affordable housing development. Annually, the City shall conduct outreach to property owners and assist developers in identifying available vacant and underutilized properties in the city that are suitable sites for residential development. The City shall also continue to make this information available to the public and developers through the City's website.

Monitoring Development of Pipeline Projects

The City's Site Inventory includes two pipeline projects (Sites 16 and 17) that will accommodate a total of 341 residential units, including 96 moderate-income and 245 above-moderate-income units. To ensure these units are developed within the planning period, the City will closely monitor the progress of these projects. In December 2027, the City will conduct a mid-cycle evaluation for each pipeline project to assess development progress. If construction has not commenced by January 2028, the City will explore alternative land use strategies, such as rezoning or identifying alternative sites for development.

Timeline:	▪ Upon Housing Element adoption, make the sites inventory available on the City website. ▪ Annually update APRs. ▪ Develop database to track City-owned lands available for development by June 2026. ▪ Annually conduct outreach to property owners and assist developers in identifying vacant and underutilized properties in the city. ▪ Monitor development progress of Sites 16 and 17 and conduct mid-cycle evaluation in December 2027. ▪ Pursue alternative land use strategies, such as rezoning or identifying alternative sites for development by January 2028.
Objectives:	▪ Maintain a sites inventory that is adequate to accommodate the City's adjusted RHNA of 3,912 units. ▪ Track City-owned lands available for development.
Performance Metric:	Number of sites available for meeting RHNA goals
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply

Program 1.2 Replacement Housing Requirements

Pursuant to new State Law (AB 1397), non-vacant sites identified in the sites inventory with existing, vacated, or demolished residential uses and occupied by, or subject to an affordability requirement for, lower-income households within the previous five years, must be replaced with units affordable to lower-income households. As a condition of any development on the site, the replacement housing requirements must be consistent with those set forth in the State Density Bonus Law.

Timeline:	▪ Amend Municipal Code by December 2025 ▪ Annually monitor development of non-vacant sites.
Objectives:	▪ Pursuant to State Law, amend the Municipal Code by the end of December 2025 to include the replacement housing requirements on non-vacant sites used to fulfill the City's lower-income RHNA. ▪ Monitor development of non-vacant sites identified in Chapter 2 and ensure that any development, as a condition of project approval, replace existing units occupied by or deed-restricted for occupancy by lower-income households are replaced.
Performance Metric:	Number of units replaced
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply

Program 1.3 Encourage Lot Consolidation to Facilitate Housing Development

While the City does not rely on small sites (less than 0.5 acres) to fulfill its lower-income RHNA, the City encourages the consolidation of small parcels to facilitate developments with quality site planning and amenities. To facilitate lot consolidation, the City will:

- Post the Housing Element sites inventory online with information on lot consolidation potential;
- Market lot consolidation opportunities online and provide printed materials at City Hall;
- Assist interested property owners and developers in identifying sites with consolidation potential;
- Provide technical assistance to property owners and developers on how lot consolidation could help the site planning and design of a project to achieve the maximum allowable density; and
- By December 2028, evaluate lot consolidation trends in facilitating housing development on small sites and develop additional tools and incentives, if necessary.

Additionally, the City will offer the following incentives to developers that provide affordable housing:

- Reduced planning fees for projects that include 20 percent deed-restricted affordable units; and
- Provide concurrent/expedited review of project applications.

Timeline:	▪ Upon Housing Element adoption, post sites inventory online. ▪ Annually monitor lot consolidation projects. ▪ By December 2028, evaluate lot consolidation trends.
Objectives:	▪ Promote lot consolidation with the goal of achieving four projects with lot consolidation during the planning period. ▪ Review and revise lot consolidation tools and incentives by December 2028.
Performance Metric:	Number of lot consolidation projects during planning period.
Geographic Targeting:	City-wide, specifically in the City's downtown region.
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply

Program 1.4 Density Bonus

The City's Density Bonus provisions must be updated to reflect recent changes to State law, such as AB 1763, which made several changes to density bonus requirements for 100 percent affordable projects, AB 2345, which further incentivizes the production of affordable housing, and AB 1227, which includes provisions for students experiencing homelessness.

Timeline:	▪ Amend City's Density Bonus Ordinance by June 2026.
Objectives:	▪ Amend the City's Density Bonus Ordinance to be consistent with recent changes to State Density Bonus Law. Ensure City's Inclusionary Housing Ordinance complies with State Density Bonus Law. ▪ Achieve 100 lower-income affordable units between 2023-2031 through density bonus and inclusionary hosing.
Performance Metric:	Number of lower-income affordable units permitted during planning period through density bonus.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply

Program 1.5 Inclusionary Housing Requirements

In 2013, the City adopted an Inclusionary Housing Ordinance (Municipal Code Chapter 18.86), which has since had limited success in generating affordable housing units, largely due to a lack of dedicated oversight to enforce the ordinance. Without consistent enforcement, developers have often opted to pay the in-lieu fee instead of building affordable units. To encourage the construction of affordable housing amid expected development growth, the City will dedicate staff to manage the housing element, focusing on implementing and enforcing the Inclusionary Housing Ordinance to promote affordable unit construction over in-lieu fee payments.

Additionally, to ensure compliance with recent changes to State Density Bonus Law, the City will review and update its Inclusionary Housing Ordinance, if necessary.

Timeline:	▪ Review and update, if necessary, the City's Inclusionary Housing Ordinance to comply with State Density Bonus Law by December 2026.
Objectives:	▪ Ensure City's Inclusionary Housing Ordinance complies with State Density Bonus Law. ▪ Achieve 100 lower-income affordable units between 2023-2031 through density bonus
Performance Metric:	Number of lower-income affordable units permitted during planning period inclusionary housing.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development

Program 1.6 Facilitating Affordable Housing Development

The City currently has limited staffing to oversee housing element implementation. To meet RHNA goals and support residential development, the City will hire 1.0 Full-Time Equivalent (FTE) to the Community Development Department to focus on housing issues and needs. This will include facilitating affordable housing development for lower- and moderate-income households, including Patterson's workforce, extremely low-income (ELI) individuals, and those with disabilities and developmental disabilities, through the following initiatives:

- Coordinate annually with the Stanislaus Regional Housing Authority to market and provide Housing Choice Vouchers (HCV) to eligible Patterson residents;
- Refer ELI residents to wrap-around support services and community organizations (i.e. housing resources, transportation assistance, utility assistance, etc.);
- Research the feasibility of establishing an Affordable Housing Matching Program to allow ELI residents to monitor the availability of affordable housing in the city. Assess feasibility by June 2026. If determined feasible, identify City staff or a consultant to develop and implement the program by January 2027;

- Maintain a list on the City's website of resources available to special needs groups, including ELI residents;
- Collaborate with non-profit organizations and developers to construct affordable units that are suitable for the needs of large households;
- Conduct outreach annually to interested developers; annually assist with identification of appropriate sites for affordable housing;
- Provide information on the city website highlighting local fabricators that build high density residential;
- Annually assist nonprofit developers to pursue affordable housing funds available at local, state, and federal levels to implement the goals and policies of this Housing Element;
- Provide expedited planning review and processing for affordable housing projects, and offer pre-application consultation to ensure maximum development potential is achieved;
- Reduce planning permit entitlement fees for affordable housing projects with deed-restricted units by 50 percent and defer payment of impact fees until prior to issuance of Certificate of Occupancy;
- Grant development concessions and incentives for housing developments that include units affordable to ELI households; and
- Seek cost-effective methods to reduce housing construction costs.

Timeline:	▪ Hire 1.0 FTE to manage housing element implementation by December 2025. ▪ Annually coordinate with the Housing Authority to encourage ELI residents to apply for HCV. ▪ Determine if Affordable Housing Matching program is feasible by June 2026. If feasible, implement by January 2027. ▪ Semi-annually update the City's website with resources for ELI (and other special needs) residents. ▪ Ongoing referral of ELI residents to support services and community organizations. ▪ Annually coordinate with non-profit organizations and developers in identifying funding resources and housing opportunity sites on an annual basis. ▪ Annually meet with housing developers to identify opportunities for affordable housing development. ▪ Implement identified cost-effective methods to reduce housing construction by June 2027. ▪ Annually monitor lower-income housing units permitted during the planning period.
Objectives:	▪ Match at least 5 ELI residents with landlords willing to accept HCV ▪ Refer at least 10 ELI residents to social service organizations ▪ Expedite planning review and processing for affordable housing projects. ▪ Monitor the number of lower-income housing units permitted during the planning period with a goal of achieving 1,770 lower-income units to satisfy the RHNA.
Performance Metric:	Number of lower-income units permitted during planning period.

Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-5 Facilitate Streamlined and Efficient Development Processes

Program 1.7 Establish Procedures for SB 35 and SB 330

Government Code section 65913.4 allows qualifying development projects with a specified proportion of affordable housing units to optionally move more quickly through the local government review process and restricts the ability of local governments to reject these proposals.

The City will create an SB 35 checklist and written procedures for processing SB 35 applications to ensure efficient and complete application processing and will update the documents in conformance with any changes to state law within twelve months of adoption of new laws. Additionally, the City will develop an application for SB 330 in conformance with State law.

Timeline:	▪ Adopt checklist and written procedures by June 2026 and within 12 months of any change to the law that would impact the City.
Objectives:	▪ Expedite review process for affordable residential projects.
Performance Metric:	▪ N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-5 Facilitate Streamlined and Efficient Development Processes

Program 1.8 Objective Design Standards

To remove subjectivity from the site plan review and approval process, and to provide clarity and predictability for future development and housing construction, the City will create Objective Design Standards (ODS) for mixed-use and multi-family residential developments. The City will explore funding opportunities for the development of ODS, such as REAP, or LEAP funds.

Timeline:	▪ Adopt Objective Design Standards for Mixed-Use and Multi-Family Residential by June 2026.
Objectives:	▪ Adopt Objective Design Standards for Mixed-Use and Multi-Family Residential
Performance Metric:	N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund; REAP; LEAP
Implementing Policy:	▪ Policy H-5 Facilitate Streamlined and Efficient Development Processes

Program 1.9 Supporting Transportation Demand Strategies & Reducing Parking Requirements for Multi-Family Residential Development

The City is served by the Stanislaus Regional Transportation Authority (StanRTA) which operates two bus routes, Route 45, that provides service in Patterson and to the cities of Newman and Turlock and Route 40, that provides service to Modesto. In order to facilitate transit use for residents of new multi-family residential developments, the City will encourage the development of transportation demand management strategies that include but are not limited to the following:

- Work with StanRTA to expand transportation access to the western and eastern regions of the city, specifically west of Baldwin Road to facilitate residential development and improve city-wide connectivity and east of Ward Avenue;
- Collaborate with StanRTA to develop an incentive program for developers to provide bike parking and transit passes to residents of new affordable residential units for a minimum of 10 years;
- Facilitate increased use of public transit by providing information on bus frequency and transit stop locations in common areas for the life of the program; and
- Reduction of minimum parking standards by December 2026.

To remove potential constraints to the development of multi-family housing, the City will amend the Municipal Code to reduce parking standards (including guest parking) for multi-family uses in multi-family zones as follows:

- Zero to one bedroom: one onsite parking space;
- Two bedrooms: one and one-half onsite parking spaces; and
- Three or more bedrooms: two onsite parking spaces.

Timeline:	▪ Collaborate and develop transportation demand management strategy by June 2027. ▪ Amend Municipal Code to reduce parking standards by December 2026.
Objectives:	▪ Address constraints and facilitate the development of affordable housing. ▪ 50 transit passes per year with new affordable units.
Performance Metric:	▪ Number of affordable units permitted.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-5 Facilitate Streamlined and Efficient Development Processes ▪ Policy H-6 Promote Sustainable and Energy-Efficient Housing

Program 1.10 Remove Barriers to Multi-family Residential Development

To remove potential zoning constraints related to residential development standards on housing development, particularly for affordable multi-family residential units, the City is committed to amending the Zoning Code for the High Density Residential, Neighborhood Commercial, and Downtown Core Zoning Districts, as detailed in Table 3-2. The proposed changes to development standards do not apply to the Zacharias Baldwin Ranch Master Plan areas.

Parking standards will be revised in accordance with the specifications in Table 3-2. These measures, along with the City's support to StanRTA, are also included in Program 1.9. Further, the City will remove the conditional use permit (CUP) requirement for multi-family residential units in the Downtown Core (DC) Zoning District.

The site inventory in Chapter 4 of this Housing Element relies on increased densities in the High Density Residential (HR) and Downtown Core Zoning Districts to meet RHNA goals. To support this, the City is committed to raising residential densities in the High Density Residential Zoning District from the current range of 12.1 to 20.0 dwelling units per acre to 20.1 to 35.0 dwelling units per acre, and in the Downtown Core Zoning District from 12.1 to 20.0 dwelling units per acre to 20.0 to 35.0 dwelling units per acre, as outlined in Table 3-2. This amendment to the Zoning Code, including all those specified in Table 3-2, will be implemented by December 2025.

Additionally, subjective approval findings in the Municipal Code have the potential to lead to inconsistent and discretionary project approvals. To remove constraints for housing development, the City will amend Municipal Code Chapter 18.18.040E to modify the findings of approval to remove the following language:

"The architectural and general appearance of the structures and grounds shall have architectural unity and be in keeping with the character of the neighborhood as not to be detrimental to the orderly and harmonious development of the city, or to the desirability of investment or occupation in the neighborhood."

Table 3-2 Proposed General Plan and Zoning Amendments to Residential Development Standards

Zoning District	Existing Standards	Proposed Standards
High Density Residential	Density: 12.1—20.0 Front setback: 25' Rear setback: 20' Height Maximum: 45' (3 stories) Distance between main buildings: 25' Distance between any wall of a main building containing living room windows and any other wall of a main building: 35'	Density: 20.1—35.0 Front setback: 15' Rear setback: 15' Height Maximum: 45' (4 stories) Distance between main buildings: 15' Distance between any wall of a main building containing living room windows and any other wall of a main building: 20'
Neighborhood Commercial	Density: 3.1—10.0 Height Maximum: 32' (2 stories)	Density: 12.0—20.0 Height Maximum: 32' (3 stories)
Downtown Core	Density: 12.1—20.0 Height Maximum: 45' (3 stories)	Density: 20.0—35.0 Height Maximum: 50' (4 stories)
Development Type	**Parking Requirements**	
Single-Family & Multi-Family Residential	Studio or 1-bedroom: 1 covered space 2-bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: 2 covered spaces	Studio or 1-bedroom: 1 covered space 2-bedrooms: 1.5 covered spaces 3+ bedrooms: 2 covered spaces
Apartments	Studio: 1 covered space 1-bedroom: 1.5 (1 covered) spaces 2+ bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: Plus 1 additional guest parking space for every 3-bedroom unit	Studio: 1 covered space 1-bedroom: 1 covered space 2+ bedrooms: 1.5 uncovered spaces 3+ bedrooms: 2 covered spaces
Senior Housing	Same number of spaces required for dwellings or apartments; however, the number of spaces may be reduced if the planning commission makes a finding that not all spaces are needed*	n/a

SOURCE: City of Patterson
NOTE: These proposed changes to development standards do not apply to the Zacharias Baldwin Ranch Master Plan areas.

Timeline:	▪ Amend Municipal Code by December 2025.
Objectives:	▪ Address Zoning Code constraints and facilitate the development of multi-family housing. ▪ Amend Municipal Code residential development standards as outlined in Table 3-2. ▪ 2,229 lower-income units developed during the planning period.
Performance Metric:	▪ Number of lower-income housing units developed during the planning period.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-5 Facilitate Streamlined and Efficient Development Processes

Program 1.11 Land Use and Zoning Amendments to Achieve RHNA Goals

The City of Patterson has an unaccommodated housing need of 196 lower-income units from the 5th Cycle Housing Element. In accordance with Government Code Section 65584.09, this deficit must be addressed in addition to the 6th Cycle RHNA allocation of 3,716 units, resulting in a total housing need of 3,912 units. To accommodate this requirement and to meet the lower-income RHNA, the City will rezone land to facilitate high-density residential development. Currently, the high-density residential zoning district permits a minimum of 12.1 dwelling units per acre and a maximum of 20 dwelling units per acre. Upon implementation of Program 1.10, the high-density residential zoning district will permit a minimum of 20.1 dwelling units per acre and maximum of 35 dwelling units per acre.

Table 3-3 identifies the specific sites that require rezoning, with the City committed to completing the necessary zoning amendments by December 2025.

Pursuant to Government Code section 65583.2, subsection (h), the City shall implement a by-right non-discretionary approval process option for sites requiring rezoning due to a shortfall, when at least 20 percent of the units are affordable to lower-income households during the planning period. Sites requiring rezoning are identified in Table 3-3 on the following page.

Table 3-3 Sites Requiring General Plan Land Use Change and Zoning Amendment

Site ID	Land Use Change	Zoning Change	APN	Acreage	Site Access	Available Infrastructure	Realistic Capacity: Lower-Income Units
6	General Commercial to High Density	GC to HR	048-042-001	5.5	Unconstrained	Yes, current	156
7	General Commercial to High Density	GC to HR	048-042-008	3.97	Unconstrained	Yes, current	113
8	Low Density to High Density	LR to HR	048-043-002	2.08	Unconstrained	Yes, current	59
9	General Commercial to High Density	GC to HR	048-043-015	2.55	Unconstrained	Yes, current	72
10	General Commercial to High Density	GC to HR	048-048-007	10.21	Unconstrained	Yes, current	283
12	Highway Service Commercial to Mixed-Use	HSC to MU	021-028-007	3.41	Unconstrained	Yes, current	48
13	Highway Service Commercial to Mixed-Use	HSC to MU	021-028-008	2.06	Unconstrained	Yes, current	29
14	General Commercial to Mixed-Use	GC to MU	021-098-003	8.53	Unconstrained	Yes, current	120
						Total Units	880

SOURCE: City of Patterson, 2024

NOTE: All sites identified in this table are analyzed in Chapter 4 of this Housing Element. HR and MU Zoning Districts allow 20.1 – 35.0 dwelling units per acre, as implemented through Program 1.10.

Pursuant to Government Code section 65583.2 subdivision (i), by-right means a jurisdiction shall not require the following:

- Conditional Use Permit;
- Planned Unit Development Permit;
- Design review other than Objective Development Design Standards; or
- Other discretionary, local government review or approval that would constitute a "project" as defined in Section 2100 of the Public Resources Code (California Environmental Quality Act "CEQA").

Sites 6, 8, and 9, have existing commercial uses, which are required to discontinue to redevelop the land for residential uses as outlined in Chapter 4, Housing Resources and Site Inventory. If the necessary zoning amendments for these sites are not completed by December 2025, the City will identify suitable and appropriately sized alternative site(s) to meet the RHNA within six months of the necessary zoning amendments not being completed. Identified alternative sites will be appropriately zoned, with the appropriate minimum acreage to allow for a capacity of at least 16 units per acre, subject to the same by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i), etc., that the currently identified sites are subject to.

Timeline:	▪ Complete zoning amendments by December 2025. ▪ Identify alternative sites within 6 months of December 2025, if necessary.
Objectives:	▪ 880 lower-income units developed by June 2031
Performance Metric:	▪ Sites 6-10 and 12-14 rezoned ▪ Sites 6, 8, and 9, existing uses discontinued by December 2025
Geographic Targeting:	--
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply

Program 1.12 By-Right Approval Requirements

5th Cycle Unaccommodated Need

Program H-1.A from the prior Housing Element included provisions to rezone sites to meet the RHNA for lower-income households. This program was implemented in 2020 through Resolution 2020-25, which approved the rezoning of 13.16 acres at Weber Avenue and First Street to High Density Residential, facilitating the development of approximately 300 lower-income units.

Pursuant to Government Code Section 65583.2 subdivisions (h) and (i), the City will amend Resolution 2020-25 to include by-right provisions to permit multi-family development without discretionary review. Amendment of the resolution shall be completed by October 2025.

Previously Identified Housing Sites

Pursuant to Government Code Section 65583.2(c), sites identified in the 6th cycle housing inventory that were also included in previous planning periods are required to be approved by-right, with no discretionary review, when at least 20 percent of the residential units are designated as affordable for lower-income households. Table 3-4 outlines the housing opportunity sites subject to these mandatory provisions.

Timeline:	▪ Housing developments with 20 percent affordability to lower-income households on prior identified sites, as described above, will be permitted by-right pursuant to Government Code section 65583.2, subdivision (i) upon adoption of the housing element with supplemental procedures to be established within three months of adoption. ▪ Amend Resolution 2020-25 to include by-right provisions by October 2025.
Objectives:	▪ Remove barriers to affordable housing development.
Performance Metric:	▪ Number of lower-income units permitted during planning period.
Geographic Targeting:	--
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply

Table 3-4 Sites Subject to By-Right Approval Provisions with 20% Affordable Units

Site Number	APN	Realistic Unit Capacity
5	047-034-035	60
10	048-048-007	283

SOURCE: City of Patterson, 2024
NOTE: All sites identified in this table are analyzed in Chapter 4 of this Housing Element.

Program 1.13 Update Permit Database System

Efficient permit processing and enhanced public access to permitting information are essential for providing greater certainty in project development. Comprehensive databases are critical for accurately tracking and recording permit approvals. To improve these processes, the City will allocate resources to implement an online platform, such as iWorq or Accela, to monitor building

permits and increase public accessibility. This system will enhance record-keeping accuracy, support the timely completion of Annual Progress Reports (APR), and allow City staff to focus more directly on housing-related projects rather than addressing public inquiries regarding permit statuses.

Timeline:	▪ Implement online database tracking platform by December 2028
Objectives:	▪ Improve permit processing, increase public accessibility, and support timely completion of APRs.
Performance Metric:	▪ N/A
Geographic Targeting:	--
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-5 Facilitate Streamlined and Efficient Development Processes

Program 1.14 Facilitating Development of the Zacharias & Baldwin Ranch Master Plan Areas

The Zacharias and Baldwin Ranch Master Plan areas are both planned for within one master plan document.

Infrastructure Improvements

The Master Plan Area requires the expansion of water and wastewater systems to support future growth. To ensure the water and wastewater improvements are constructed in a timely manner, the City is committed to the following actions:

- Continue to actively pursue funding opportunities on an annual basis, such as Proposition 4, congressional funding, State Revolving Loan Funds, and other relevant funding sources to implement the necessary infrastructure to address water supply challenges and support ongoing development;
- The City will facilitate the phasing of infrastructure to enable timely residential development to meet the City's RHNA;
- The City commits to charge developers their respective fair share payments as part of the larger needed improvements to the infrastructure required for development of the Master Plan Area including water, sewer, and stormwater;
- Require that all new development include stormwater retention and percolation on site;
- Make its best efforts to begin design and environmental review of the Del Puerto Creek Project no later than December 2026;

- Require purchase of surface water from all new development in the amount required to meet the water demand of developers' projects;
- Capture storm water for recharge rather than discharge to Salado Creek and will help address the City's use of the upper and lower aquifers;
- Expand the City's Water Quality Control Facility by installing a membrane bioreactor superstructure in addition to other water quality improvements. This expansion will provide the City with the opportunity to further treat wastewater and convey it back to the City for non-potable reuse or transfers with lower aquifer pumpers. Final design for the expansion has already been completed. Construction is anticipated to begin by the end of 2025;
- The City is one of 23 Groundwater Sustainability Agencies responsible for implementation and compliance with the Delta Mendota Subbasin Groundwater Sustainability Plan (GSP). Accordingly, the City is required to monitor and enforce compliance pursuant to State law.[1] Program 1.14 is a necessary component of the City's accountability and compliance with the GSP;
- The City will work with neighboring agencies to maximize beneficial use of the available storm water in the region by working with other water suppliers, including water and irrigation districts in the northern region of the Delta Mendota Subbasin to develop a regional solution for recharge consistent with and as required by the Sustainable Groundwater Management Act; and
- The City will collaborate with developers to ensure the timely construction of infrastructure, thereby facilitating the readiness of residential units for occupancy within the eight-year planning cycle.

In December 2027, the City will conduct a mid-cycle review. If infrastructure improvements are not funded or underway by January 2028, the City will consider alternative land use strategies, such as identifying alternative sites with appropriate densities to support lower-income units, amending zoning or other land use documents to make suitable land available for housing development to meet the RHNA or increasing permitted residential densities to ensure no net loss. Alternative actions shall be completed by December 2028. The City will also continue to review potable water supply portfolios to ensure adequate water availability.

Residential Development

To facilitate the development of ADUs and JADUs alongside new single-family homes, the City will require that at least 15 percent of new single-family units in the Master Plan area include either an ADU or JADU. This requirement aims to promote a diverse mix of housing types within the new Zacharias and Baldwin Ranch South communities.

[1] Water Code section 10727 et seq.

To ensure housing targets are met, the City will closely monitor project approvals, denials, and post-entitlement steps necessary to construct housing. The City will actively monitor building permit issuance for all residential units, including ADUs at least twice during the planning period, with the initial check point in June 2026 followed by June 2027. If development falls short of the target of 3,503 residential units by June 2027, the City will reassess its land use strategies and pursue alternative actions, such as amending zoning or other land use documents to meet RHNA requirements and ensure continued progress toward housing development goals by January 2028.

Subdivision Process

Further, the Master Plan area requires subdivision of parcels to accommodate residential uses. To ensure the subdivision process is completed promptly to facilitate residential development within the planning period, the City is committed to the following actions:

- Annually conducting outreach with property owners and non-profit affordable housing developers to maintain project momentum;
- Providing density bonuses in accordance with State law;
- Reducing fees and expediting permitting processes to shorten time to market;
- Offering technical assistance and resources, such as navigating regulatory requirements; and
- Marketing the SB 35 by-right approval process when development plans include 20 percent affordable units.

Timeline:	▪ Target completion of infrastructure improvements by December 2027 ▪ Monitor project approvals, denials, post-entitlement steps with check points in June 2026 and June 2027 in obtaining 3,503 residential building permits by June 2027 ▪ Annually apply for funding to support development of infrastructure ▪ Pursue alternative actions, such as making necessary amendments to zoning or other land use documents to make available appropriate land for residential development by January 2028 ▪ Complete alternative actions by December 2028 ▪ Development of 3,840 units anticipated to be constructed in the Master Plan areas by 2031
Objectives:	▪ 356 very low-income units; 194 low-income units; 415 moderate-income units; 2,580 above moderate-income units; and 295 ADUs
Performance Metric:	▪ Facilitate development in the Master Plan Area
Geographic Targeting:	--
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply; Policy H-2 Promote Affordable Housing Development

Program 1.15 Water Supply to Support Development

The 2024 Groundwater Sustainability Plan (GSP) establishes a pumping reduction plan which requires the City to reduce its groundwater pumping to 2,626 acre-feet per year by 2030. Despite the pumping reduction plan, the City can still support additional development through the construction and implementation of water infrastructure projects funded by respective fair shares of proposed development, including the Del Puerto Creek Capture and Recharge Project, which was included as part of the Zacharias and Baldwin Ranch Master Plan.

To ensure this does not pose a constraint to the development of low-income residential units during the planning period, the City is committed to prioritizing water resources for low-income residential developments. The City has identified and is pursuing multiple options to support planned and future development, while remaining in compliance with the 2024 GSP. These options include:

1. Require water demand from future development to be offset by the purchase of surface water to be diverted for recharge in the Del Puerto Creek Project basins;
2. Continue to pursue funding opportunities on an annual basis to implement the necessary infrastructure to address water supply challenges and support ongoing development, including applying for the Bureau of Reclamation WaterSMART grant to fund project design of the Del Puerto Creek Project or any other water projects;
3. The City will provide flexibility in permit timing relative to needed infrastructure improvements, and facilitate the phasing of infrastructure to enable timely residential development to meet the City's RHNA;
4. The City commits to charge developers their respective fair share payments as part of the larger needed improvements to the infrastructure required for development of the Master Plan Area including water, sewer, and stormwater;
5. Upon completion of the Del Puerto Creek Project, the City will recharge the total amount of purchased and delivered surface water to meet the increase in water demand as a result of development projects;
6. The City will require development projects with potable water demand to contribute to funding for an evaluation of a redesign of the existing storm water infrastructure associated with the Black Gulch Drainage Area. This Project will redesign the existing system to capture storm water for recharge rather than discharge to Salado Creek. This will address the City's use of the upper and lower aquifers for water supply;
7. The City will work with neighboring agencies to maximize beneficial use of stormwater to develop a regional solution for recharge consistent with SGMA;
8. The City will coordinate and collaborate with property owners and developers on at least an annual basis to accelerate housing development;

9. Implement a recycled water program; and
10. Prioritize conservation.

In December 2027, the City will review the status of water infrastructure projects that support development of low-income residential units and assess whether alternative actions are needed to meet RHNA targets. If the City's infrastructure improvements are not underway by January 2028, the City will pursue alternative strategies to meet RHNA, such as identifying alternative sites with adequate infrastructure to support development, upzoning or increasing density to accommodate more residential units. Alternative actions shall be completed by December 2028. The City will also continue to review potable water supply portfolios to ensure adequate water availability.

Refer to Program 3.1 for City actions in support of water conservation.

Timeline:	▪ Annually review overall progress and effectiveness in April and include information in annual report to HCD ▪ Annually apply for funding to support development of water infrastructure ▪ Mid-cycle evaluation by December 2027 ▪ Pursue alternative actions, such as making necessary amendments to zoning or other land use documents to make available appropriate land for residential development by January 2028 ▪ Complete alternative actions by December 2028
Objectives:	▪ 1,770 low-income units permitted by June 2031
Performance Metric:	▪ Ensure adequate water supply to support development of low-income residential units to meet RHNA
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development

Program 1.16 Consistency with the General Plan

Being that the Housing Element represents one out of many elements that make up the General Plan, the City will ensure that the 6th Cycle Housing Element maintains uniformity with the remainder of the general plan elements. Implementation of housing element programs primarily impacts the following general plan elements: circulation, land use, and safety elements.

Throughout the planning period, City staff shall cross-compare the policies and programs found within this housing element to the other elements of the general plan to ensure internal consistency. Any inconsistencies between the housing element and general plan shall be acknowledged and resolved. The City shall make use of zoning amendments to resolve any inconsistencies between the densities set forth in the housing element and zoning densities mentioned in other elements of the general plan. During the planning period, City staff shall set forth a schedule of anticipated updates

for the general plan elements. This program correlates to the implementation of Program 1.10 Remove Barriers to Multi-Family Residential Development, which outlines changes to the zoning code, and Program 1.11 Land Use and Zoning Amendments to Achieve RHNA Goals, which outlines several sites that require amendments to land use and zoning designations. See Program 1.10 and Program 1.11 for specific details.

Timeline:	▪ Ongoing throughout the planning period ▪ Implement Program 1.10 Zoning Code changes by December 2025 ▪ Implement Program 1.11 land use and zoning amendments by December 2025
Objectives:	▪ Cross-compare the Housing Element with other General Plan elements to ensure internal consistency ▪ Amend the zoning code, as necessary, to resolve any discrepancies between the General Plan elements
Performance Metric:	▪ N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-9 Ensure Consistency with the General Plan

Program 1.17 Diversify and Expand the Housing Stock

The City is committed to diversifying and expanding Patterson's housing stock to meet the diverse needs of various demographic groups within high-opportunity areas. This effort will focus on regions south of Zacharias Road, west of State Route 33, north of Elfers Road, and east of Baldwin Road, including the City's Master Planned areas. The City is committed to the following actions:

- Review the General Plan, Zacharias and Baldwin Ranch Master Plan, and the Zoning Code and Zoning Map to identify opportunities for removing barriers to housing production, increasing housing capacity, and accommodating a variety of dwelling types, such as "missing middle" housing. Amendments will be recommended as needed to enhance housing capacity in high-opportunity areas;
- Identify opportunities to promote a greater variety of dwelling types and sizes, particularly those suitable for moderate-income households (e.g., duplexes, triplexes, fourplexes, and townhouses), in lower-density, higher-resource residential areas;
- Identify potential funding sources to support affordable housing developments for special-needs populations, including seniors, homeless individuals, female-headed households, large families, low-income households, and persons with disabilities. This will be achieved by monitoring government websites, grant databases, and leveraging regional resources such as the Stanislaus Regional Housing Authority; and

- Facilitate the development of housing for persons with disabilities, including developmental disabilities, through incentives such as reduced development standards, fee waivers, and financial assistance for affordable housing development that includes necessary services, resources, and support.

Timeline:	▪ Review General Plan, Master Plan, Zoning Code and Zoning Map by June 2026, adopt amendments by January 2027. ▪ Identify opportunities to promote a variety of dwelling units by June 2026, adopt amendments by January 2027. ▪ Annually identify funding sources to support affordable housing development. ▪ Adopt incentives to facilitate development of housing for persons with disabilities by January 2027.
Objectives:	▪ Diversify and expand the city's housing stock in higher resource areas with a goal of encouraging the development of 150 missing middle/multifamily units in higher resource areas in the planning period. ▪ Prioritize and apply for grant opportunities that are most feasible to obtain and best fit the City's needs, with a goal of obtaining $1 million in grant funding to support affordable housing development for special needs households in the planning period. ▪ Support non-profit organizations and housing developers in creating 50 housing units for special needs households during the planning period or at least five units annually.
Performance Metric:	▪ N/A
Geographic Targeting:	City-wide, specifically high resource areas and Master Plan areas
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply

Goal 2: Preserve and Improve Existing Housing Stock

Program 2.1 Property Inspection/Code Enforcement

The City will ensure all existing units meet basic health and safety standards by enforcing local codes. Code enforcement staff will regularly monitor neighborhoods, address violations as they arise, and respond to complaints.

In residential areas, especially those located east of State Route 33 and in the downtown area, the City will proactively offer information and assistance to property owners, including grants and loans through the City's Minor Home Repair Program to address health and safety hazards. Other available programs include weatherization grants (Turlock Irrigation District, PG&E, State LIHEAP), home painting programs, and housing rehabilitation assistance, rebates on home improvements, and energy efficiency.

The City will affirmatively market these resources by:

- Posting information on the City's website;

- Providing written materials to community groups and local organizations representing lower-income households, including the Patterson Family Resource Center; at City Hall; the Wednesday Farmer's Market; and through various outlets, such as the quarterly City newsletter; and
- Distributing program details directly to property owners via mail.

The City will evaluate the feasibility of implementing annual rental inspections for multi-family developments with 10 or more units. These inspections, covering building exteriors, interiors, common areas, and basements (where applicable), would provide critical insights for the Housing and Code Enforcement Divisions, enhancing their ability to plan and respond effectively to residents' needs. However, due to current staffing and financial limitations, the City is not able to commit to the program at this time but will continue to assess its viability for future implementation.

Timeline:	▪ Ongoing; review annually. ▪ Report code violations and enforcement activities to the City Council on monthly basis. ▪ Multi-family rental inspections (December 2030)
Objectives:	▪ Affirmatively market rehabilitation programs and assistance. ▪ Investigate and address at least 5 code violations per month. ▪ 56 units rehabilitated (24 very low-, 24 low-, and 8 moderate-income units) during the planning period. ▪ Assess feasibility of implementing annual rental inspections for multi-family developments.
Performance Metric:	▪ Number of code violations and complaints addresses. ▪ Number of Minor Home Repair applications received annually. ▪ Number of homes rehabilitated during planning period. ▪ Number of inspections completed.
Geographic Targeting:	City-wide, specifically east of State Route 33 and downtown
Responsible Agencies:	Community Development Department
Funding Sources:	ARPA funds
Implementing Policy:	▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-7 Protect and Stabilize Residential Neighborhoods

Program 2.2 Conservation of Existing Affordable Housing

The City has an inventory of 254 housing units that are deed-restricted as affordable housing; none are considered to be at-risk of converting to market-rate housing within the next 10 years. The City will continue to monitor the status of its affordable housing resources and work to conserve all units to the extent feasible. Further details regarding the City's deed-restricted affordable units are provided in Chapter 1, Housing Needs and Constraints Assessment.

Timeline:	▪ Ongoing; annually monitor. ▪ Report code violations and enforcement activities to the City Council on monthly basis.
Objectives:	▪ Annually monitor the affordable units by maintaining contact with property owners regarding their intent to maintain the units as affordable housing, with the goal of preserving 254 affordable units in the inventory. ▪ When a Notice of Intent to convert from low-income housing to market-rate housing is received (three years in advance pursuant to State law), work with property owners to ensure that the tenants are properly noticed and provided information on potential resources for assistance, and any applicable displacement and relocation requirements are complied with. On an ongoing basis, work with nonprofit housing providers to pursue funding to preserve and improve existing affordable housing.
Performance Metric:	▪ Number of units preserved during the planning period.
Geographic Targeting:	City-wide, specifically east of State Route 33
Responsible Agencies:	Community Development Department
Funding Sources:	State HOME Funds
Implementing Policy:	▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-7 Protect and Stabilize Residential Neighborhoods

Goal 3: Exemplify Sustainable Development and Energy Conservation

Program 3.1 Water and Energy Conservation Opportunities

The City will continue to enforce Title 24 and California Green Building Standards Code requirements for energy conservation. To enforce water conservation and support the reduction of groundwater pumping, the City will pursue the feasibility of implementing the following measures:

- Water Use Restrictions: By October 2025, the City shall establish limits on water usage during peak demand periods or drought conditions, such as restricting outdoor irrigation or limiting water-intensive activities like car washing;
- Land Use and Development Restrictions: By January 2026, the City shall implement an ordinance establishing land use and development restrictions that mandate water-efficient designs and landscaping for new developments, including drought-resistant plants and efficient irrigation systems; and
- Fines for Non-Compliance: By June 2026, the City shall impose fines or penalties for violators of water conservation rules, such as exceeding water usage limits or failing to follow mandated watering schedules.

In residential areas, the City will continue to proactively offer rebate program assistance to property owners, including the following City rebate programs:

- Cash for Grass Rebate Program: aims to permanently reduce the amount of water used for landscaping purposes. The City offers $1.00 for every square foot of turf removed and replaced with drought-resistant or water-efficient landscaping;

- High Efficiency Toilet Rebate Program: involves replacing high-water-use toilets with low-flush toilets, which are estimated to save approximately 38 gallons of water each day. The rebate amount for a qualifying high-efficiency toilet (1.28 gallons per flush or less) is $100; and
- Water Conservation Program: provides free low-flow bathroom and kitchen aerators, free showerheads, and free toilet leak detection tablets are available.

Local utility providers, such as Turlock Irrigation District (TID) and Pacific Gas and Electric (PG&E), offer additional rebate programs that assist lower-income households and support city energy conservation goals (see Chapter 2, Table 2-15 for list of these programs).

Based on available resources, the City shall develop and periodically update energy efficiency and water conservation awareness brochures, and provide them in all publicly accessible City buildings and in the City's quarterly newsletter. All educational materials will be developed in English and Spanish.

Timeline:	▪ Review annually and report in APR ▪ Establish water use restrictions by October 2025 ▪ Implement land use and development restrictions by January 2026 ▪ Impose fines/penalties by June 2026
Objectives:	▪ 20 rebate program applications per year.
Performance Metric:	▪ Number of rebate program applications received per year
Geographic Targeting:	City-wide, specifically east of State Route 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-6 Promote Sustainable and Energy-Efficient Housing ▪ Policy H-7 Protect and Stabilize Residential Neighborhoods

Goal 4: Provide New Affordable and Other Special Needs Housing

Program 4.1 Reasonable Accommodation and Housing for Persons with Disabilities

In 2015, the City amended its Zoning Ordinance to provide a procedure to request reasonable accommodations for persons with disabilities seeking equal access to housing under the Fair Housing laws in the application of zoning laws, building codes, and other land use regulations, policies, and procedures (Municipal Code Chapter 18.89).

The Municipal Code does not restrict who can appeal a request for reasonable accommodation, which could hinder approval if individuals unrelated to the request oppose it. To address this potential constraint, the City will amend the Municipal Code to limit the parties eligible to appeal a request for reasonable accommodation to the applicant or the personal beneficiary.

The Municipal Code provides "potential impact on surrounding uses" as one of the determining factors for approval or denial of reasonable accommodation requests. The City recognizes that this language is subjective and may hinder the approval of reasonable accommodation requests. The City will amend the Municipal Code to remove this language.

To affirmatively market fair housing opportunities for persons with disabilities, the City is committed to the following actions:

- Conduct annual meetings with developers to encourage development of projects targeted to persons with disabilities;
- Conduct annual educational workshops for landlords and tenants;
- Apply for County, State, and Federal funding as available (ARPA) for housing construction and rehabilitation for persons with disabilities; and
- Continue enforcing Building Code requirements for the inclusion of adaptable disabled accessible units in multifamily development projects that are subject to such requirements.

Timeline:	▪ Amend Municipal Code by December 2026. ▪ Conduct meetings with developers annually. ▪ Host educational workshops for landlords and tenants annually. ▪ Apply for Funding as available from State and Federal sources.
Objectives:	▪ 5 accessible units for residents with disabilities; match 5 landlords with accessible units to tenants
Performance Metric:	Number of accessible units constructed; number of landlord-tenant matches
Geographic Targeting:	City-wide, with emphasis in areas east of SR 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.2 Universal Design to Encourage Housing for Seniors and Persons with Limited Mobility

Universal Design allows for new construction and home modifications that enhance the full life cycle use of housing in order to accommodate a wide range of physical abilities or disabilities of a home's occupants. This is particularly relevant to seniors and allows residents to age in place and remain in a particular unit for a longer period of time.

The City recognizes the California Building Code is integrating many design features for persons with limited mobility. The City will consider adopting an ordinance to allow for Universal Design elements that address limited lifting (e.g. roll-in showers and grab bars), limited mobility

(e.g. push/pull lever faucets, wide swing hinges) and limited vision (e.g. additional stairwell and task lighting) pursuant to Health and Safety Code section 17959, at the next International Building Code Update Adoption.

Timeline:	▪ Adopt Universal Design Ordinance by December 2026.
Objectives:	▪ 30 accessible units by the end of planning period.
Performance Metric:	▪ Number of accessible units constructed
Geographic Targeting:	City-wide, with emphasis in areas east of SR 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.3 Residential Care Facilities

Residential care facilities are a type of supportive housing essential to residents that are living with disabilities. These facilities provide flexible and affordable housing options, and allow persons with disabilities to live in deinstitutionalized settings in a manner that helps them integrate into local communities. In accordance with Health and Safety Code Section 1568.0831, the City will implement the following amendments to the Municipal Code:

- **Residential Care Facilities Without Licensable Services:** Residential care facilities that function as single-family residences and do not offer licensable services shall be permitted in all zones that permit residential uses. These homes shall only be subject to the general health, safety, and zoning laws applicable to all single-family residences, regardless of having more than six residents. Since these homes do not provide licensable services, they should be treated like any other single-family residence;
- **Residential Care Facilities with Licensable Services for Six or Fewer Residents:** Residential care facilities operating as single-family residences and providing licensable services to six or fewer residents shall be permitted in all zones that permit residential uses. They shall only be subject to the general health, safety, and zoning laws applicable to all single-family residences, in compliance with the Health and Safety Code protections for these smaller, licensed group homes; and
- **Residential Care Facilities with Licensable Services for More Than Six Residents:** Residential care facilities that provide licensable services to more than six residents shall be permitted in all zones that permit residential uses. They shall be subject only to provisions for residential uses of the same type in the same zone.

Reasonable accommodations in these permitting processes shall be considered when an application for reasonable accommodation is submitted.

Timeline:	▪ Amend Municipal Code by December 2026.
Objectives:	▪ Amend Municipal Code to define and establish permitting procedures for residential care facilities.
Performance Metric:	▪ N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.4 Facilitating the Development of Affordable Senior Housing – Phase 2 Las Palmas Senior Apartments

Phase two of the Las Palmas Senior Housing Complex is underway and will provide 16 deed-restricted, very low-income senior housing units. The Housing Authority is currently in the design phase, and these units are included in the site inventory as Site 3.

The City shall support the Stanislaus Regional Housing Authority's plans for the 16-unit expansion of the Las Palmas Senior Housing Complex by sourcing potential funding opportunities for development, including CDBG, HOME, and other available funding.

Additionally, the City will continue to support and market the efforts of local nonprofit agencies that provide direct housing assistance to seniors. The City will prioritize developments that include units for seniors. In an effort to increase outreach on housing opportunities for seniors, the City will affirmatively market by:

- Posting information on the City website and distributing information via mail;
- Providing materials at City Hall and the Hammon Senior Center;
- Distributing information at City events like the Wednesday Farmer's Market; and
- Working with local nonprofits that assist low-income households, including the Patterson Family Resource Center and HOST House.

Timeline:	▪ Complete by June 2031.
Objectives:	▪ 16 deed-restricted very low-income senior housing units.
Performance Metric:	▪ Number of deed-restricted very low-income units permitted by end of planning period.
Geographic Targeting:	City-wide, specifically, 1075 Las Palmas Avenue
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.5 Family-Friendly Housing

The City will promote multi-family housing designs and unit mixes that attract multi-generational households by encouraging developers to include housing features such as larger units with more bedrooms (including four-bedroom units) and on-site amenities like usable outdoor open spaces for multigenerational use. Additionally, the City will encourage the inclusion of multi-purpose rooms that can be used for after-school homework clubs, computer labs, art activities, or other resident programs. To incentivize developers, the City will offer expedited permit processing, fee waivers, fee deferrals or reductions by 50 percent for projects that include family-sized deed-restricted units with four or more bedrooms.

To address potential displacement of households with four or more persons, the City will research options to expand regulatory incentives to encourage the development of larger units.

Timeline:	▪ Develop regulatory incentive by June 2026
Objectives:	▪ 15 family-friendly designated units (four bedroom units).
Performance Metric:	▪ Number of family-friendly designated units permitted by end of planning period.
Geographic Targeting:	City-wide, specifically east of State Route 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.6 Facilitating the Development of Emergency Shelters

Pursuant to AB 2339, the City will amend the Zoning Ordinance to amend the definition of emergency shelters to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care.

Currently, the City of Patterson's Zoning Ordinance permits emergency shelters in all residential zones with a Conditional Use Permit. However, the City has an Emergency Shelter Overlay Zone, which is detailed in Chapter 18.58 of the City's Zoning Ordinance, last updated in 2015. The Emergency Shelter Overlay Zone applies to the City's Heavy Industrial (HI) Zoning District, which does not permit residential uses.

In compliance with Government Code Section 65583(3)(4)(a), the City will amend the Municipal Code, to remove reference to the Emergency Shelter Overlay Zone and permit emergency shelters by-right, without a conditional use or other discretionary permit in the Downtown Core (DC) Zoning District.

Pursuant to SB 2, the City will amend the Zoning Ordinance to revise the development standards for Emergency Shelters to be consistent with State law. The following standard is subjective and increases uncertainty for development, and will be eliminated from Section 18.58.100:

- The size of an emergency facility shall be in character with the surrounding neighborhood.

Additionally, the City will amend the development standards for emergency shelters to allow proximity requirements in compliance with Government Code Section 65583(a)(4), such that emergency shelters shall not be required to be more than 300 feet apart.

In accordance with AB 139, the City will amend the Zoning Ordinance to specify that parking standards for emergency shelters may be limited only to accommodate the number of staff working in the emergency shelter, provided that the standards do not require more parking for emergency standards than other residential or commercial uses within the same zone.

Timeline:	▪ Amend Municipal Code by December 2026.
Objectives:	N/A
Performance Metric:	N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.7 Low Barrier Navigation Centers

A low barrier navigation center (LBNC) is defined as a housing first, low-barrier, temporary, service-enriched shelter aimed at helping homeless individuals and families quickly access permanent housing. "Low barrier" refers to practices that minimize entry obstacles, such as allowing partners, pets, personal item storage, and ensuring privacy (Gov. Code, § 65660). Under AB 101, a low barrier navigation center must be permitted by right in areas zoned for mixed-use and nonresidential zones that allow multi-family uses, provided it meets specific criteria, including:

1) Access to permanent housing;

2) Utilization of a coordinated entry system (e.g., Homeless Management Information System); and

3) Implementation of the Housing First approach, as defined in Welfare and Institutions Code section 8255 (Gov. Code, § 65662).

In compliance with AB 101, the City will amend its Municipal Code to define low barrier navigation centers and permit them by right in zones allowing mixed-use and nonresidential zones permitting multi-family uses.

Timeline:	▪ Amend Municipal Code by December 2026.
Objectives:	▪ N/A
Performance Metric:	▪ N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.8 Supportive Services for Individuals Experiencing Homelessness

Since 2012, the City of Patterson has supported Helping Other Sleep Tonight (HOST) House, a nonprofit addressing homelessness in Patterson, by providing a low-interest loan for transitional housing. The City has since expanded its support, including loan forgiveness and collaboration on educational programs, enabling HOST House to operate year-round. To continue supporting local nonprofit agencies assist persons experiencing homelessness, the City is committed to the following actions:

- Providing technical assistance in pursuing funding opportunities, such as Homeless Housing, Assistance, and Prevention (HHAP) Grant funding;

- Seeking innovative partnerships to provide services and emergency shelter to unsheltered persons;
- Encouraging developers to set aside units affordable to extremely low-income households; and
- Supporting countywide efforts to prevent and end homelessness through the Stanislaus Regional Homeless Strategic Plan. The City will monitor the progress of the Stanislaus Regional Homeless Strategic Plan through participation in collaborative groups, including working committees, and will continue to evaluate actions proposed in the County's Homeless Strategic Plan to provide additional shelter and safe spaces for Newman's unsheltered population.

For residents experiencing homelessness, the City will maintain a list of service providers, and will recommend the following resources to residents in need of shelter or housing:

- HOST House (City of Patterson);
- Patterson Family Resource Center (City of Patterson);
- Stanislaus County Habitat for Humanity (City of Modesto);
- Haven Women's Center of Stanislaus (City of Turlock);
- We Care Program (City of Turlock); and
- The Salvation Army of Modesto Citadel Corps.

Additionally, the City shall continue to participate in the Stanislaus County Point-in-Time (PIT) Count to quantify local homeless populations and others with a need for emergency shelter.

Timeline:	▪ Ongoing; review annually
Objectives:	▪ 10 residents referred.
Performance Metric:	▪ Number of residents referred to service providers.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.9 Transitional and Supportive Housing

Government Code Section 65583(a)(5) requires local jurisdictions to permit transitional and supportive housing as a residential use only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. Furthermore, recent changes to State law require supportive housing to be permitted by right where multi-family and mixed-uses are permitted, including non-residential zones permitting multi-family uses (Government Code section 65651). AB 2162 prohibits the imposition of parking requirements for supportive housing developments within 0.5 mile of a public transit stop.

Currently, the City of Patterson permits transitional and supportive in accordance with State law. However, the Municipal Code requires updates to reflect such changes. The City will amend the Municipal Code, in compliance with Government Code Section 65583(a)(5) to permit transitional and supportive housing in all zones that allow residential uses, subject only to the restrictions that apply to other residential dwellings of the same type in the same manner. Additionally, in accordance with AB 2162, the Municipal Code will be amended to permit supportive housing by right in zones where multi-family and mixed-uses are permitted, including nonresidential zones that allow multi-family uses. Amendments to parking requirements for supportive housing will also be implemented in accordance with AB 2162.

Timeline:	▪ Amend Municipal Code by December 2026.
Objectives:	▪ Remove barriers to affordable housing development.
Performance Metric:	▪ N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.10 Single-Room Occupancy Units (SROs)

Single-room occupancy units provide a valuable source of affordable housing for individuals and can serve as an entry point into the housing market for people who previously experienced homelessness. Pursuant to Government Code Section 65583(c)(1), promote fair housing, and increase the availability of units for lower-income households, the City will amend the Municipal Code to define single-room occupancy units and permit them by-right in all zones that allow mixed-use development.

Timeline:	▪ Amend Municipal Code by December 2026.
Objectives:	▪ N/A
Performance Metric:	▪ N/A
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.11 Employee Farmworker Housing

According to Employee Housing Act (Health and Safety Code Section 17021), local jurisdictions are required to permit employee and farmworker housing to be permitted by-right, without a Conditional Use Permit (CUP), zoning variance and/or other zoning clearance, in single-family zones for less than six persons, and in all zones that allow agricultural uses with no more than 12 units or 36 beds.

Currently, the City's Zoning Ordinance does not define employee or farmworker housing and does not distinguish employee or farmworker housing from any other type of single- or multi-family housing. The City shall update the Zoning Ordinance to add a definition for "employee and farmworker housing" to be consistent with Employee Housing Act (Health and Safety Code Section 17021). Additionally, the City will amend the Zoning Ordinance to explicitly list employee and farmworker housing as permitted uses in accordance with Health and Safety code Section 17021.

The City has 40 deed-restricted affordable farmworker housing units managed by the Stanislaus Regional Housing Authority. The City will continue to work with the Stanislaus Regional Housing Authority and the Office of Migrant Services (OMS) to provide services to farmworkers and expand farmworker housing in other areas of the city. Specifically, the City will make an effort to assist in the development of housing for employees and farmworkers and conserve and improve the existing housing stock, by taking the following actions which include, but are not limited to:

- Contacting non-profit developers annually to identify opportunities for the development or improvement of housing for employees and farmworkers;
- Coordinating and participating annually with regional organizations that serve farmworkers, including non-profits, academic institutions, and employers (e.g.: Stanislaus Regional Housing Authority, Office of Migrant Workers, Patterson Family Resource Center, Self-Help Enterprises, Farmworkers Institute of Education and Leadership) to raise awareness, share and employ strategies, and identify or target new resources;

- Reaching out to local farm employers to identify housing needs, and seeking funding to support further development or rehabilitation of farmworker housing;
- Working with partner organizations and agencies to conduct an additional survey of farmworker housing needs at least once during the planning period and adjusting farmworker-serving programs to match updated needs if appropriate;
- Coordinating annually with organizations that represent farmworkers;
- Annually monitoring the status of farmworker housing as part of their annual report to HCD on Housing Element progress and evaluate if City efforts are effective in facilitating the provision of farmworker housing. If appropriate, the City will make necessary changes to enhance opportunities and incentives for farmworker housing development; and
- Providing bilingual materials on available resources and financial assistance on the City's website and with printed materials at City offices, Patterson Public Library and community centers within the city.

Timeline:	▪ Amend Municipal Code by December 2026. ▪ Contact non-profit developers to discuss development opportunities annually. ▪ Coordinate with regional organizations annually.
Objectives:	▪ 20 additional employee/farmworker units constructed.
Performance Metric:	▪ Number of employee/farmworker residential units permitted during the planning period.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations

Program 4.12 Accessory Dwelling Units (ADUs)

Facilitating Development of ADUs

Accessory Dwelling Units (ADUs) and Junior ADUs (JADUs) offer affordable housing for family members, seniors, students, and small households. In 2023, the State introduced new provisions under the ADU law. In compliance with Government Code Section 65852.2, the City will amend its ADU Ordinance to comply with State law, including recent changes pursuant to AB 345, AB 3182, AB 68, AB 881, SB 13, AB 587, AB 670, and AB 671. The City's Building Code will also be updated to align with State requirements for ADUs. The City will continue approving ADUs through a ministerial process in accordance with State law.

To encourage the development of ADUs, the City will implement the following actions:

- Maintain a webpage on the City's website to inform the public on the benefits of ADUs; post informational materials, such as the Accessory Dwelling Unit Handbook published by the State Department of housing and Community Development (HCD); post local regulations, and example floor plans;
- Provide pre-approved ADU plans to provide a more streamlined process for property owners and developers, and will City will track the popularity of ADU plans implemented and provide targeted financing and outreach to facilitate the plans that are most viable within the community;
- Promote ADU development with an annual workshop on ADU development with building inspector and planners;
- Waive City building permit fees for units that are 749 square feet or less. The City will utilize affordable housing in-lieu fees to cover building permit fees at a specific percentage; and
- Evaluate funding, including low-interest loans to promote the development and affordability of ADUs in the City. Funding sources may include CalHFA ADU Grant Program; CalHome Program; LEAP Grants; REAP Grants; and SB 2 Planning Grants.

Amnesty for Unpermitted ADUs

The City understands that unpermitted ADUs and JADUs are present within Patterson, and that these properties are normally subject to code enforcement. The City is currently updating its ADU Ordinance to include a grandfather provision for unpermitted ADUs and JADUs, as well as an approval process for new permit applications that includes ministerial approval consistent with State ADU Law. [2]

This will increase the amount of affordable housing available to the city's students, elderly, in-home health care providers, the disabled, and others, at below market prices within existing neighborhoods. The Amnesty Program will apply to existing ADUs/JADUs in the City and will run from January 2027 through January 2030.

The City will offer the following benefits under the Amnesty Program:

- Low-cost initial inspection of the unpermitted unit;
- Suspension of code enforcement action for necessary improvements made that are identified by Codes and Standards pursuant to inspections under the Amnesty Program;
- A certification record, which will be supplied to the applicant and kept on file at the City, memorializing the improvements and assuring that there will be no subsequent code enforcement related to those improvements upon completion and inspection;

[2] Government Code section 66314 et seq

- Detailed guidance on required improvements;
- Significant reduction or waiver of planning, building, and other permit fees;
- Assurance that the accessory dwelling unit is habitable and does not present risks to inhabitants; and
- The opportunity to explore the program, prior to formal application, without risk of any penalty or enforcement.

Timeline:	▪ Amend ADU Ordinance by December 2026. ▪ Develop ADU informational webpage and pre-approved ADU plans by June 2025. ▪ Host workshop on ADU development annually. ▪ Pursue funding opportunities annually. ▪ Formalize and implement Amnesty Program by December 2026. ▪ Host Amnesty Program for 3 years (January 2027 to January 2030).
Objectives:	▪ Construction of 50 ADUs ▪ 25 ADUs/JADUs legalized (permitted) by June 2031
Performance Metric:	▪ Number of ADUs/JADUs permitted by the end of the planning period ▪ Number of ADUs/JADUs brought up to code and permitted under the Amnesty Program
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-7 Protect and Stabilize Residential Neighborhoods

Program 4.13 Affordable Housing Water and Sewer Priority

In accordance with Chapter 727, Statutes of 2004 (SB 1087), following the adoption or amendment of a Housing Element, local governments are required to promptly distribute copies to relevant water and sewer service providers. These providers are mandated to prioritize service allocations for developments that include housing units affordable to lower-income households. The purpose of this legislation is to enhance the effectiveness of existing laws in promoting housing development for lower-income families and workers.

Upon certification, the City will forward its adopted Housing Element to the Public Works Department, ensuring that priority is given to affordable housing developments for water and sewer service allocations. Furthermore, the City will establish a water distribution policy to ensure that water allocations are aligned with its regional housing needs.

Timeline:	▪ Develop written procedures for water and sewer priority by June 2025. ▪ Forward Adopted Housing Element to City's Public Services Department upon Housing Element certification.
Objectives:	▪ Prioritize water and sewer services for lower-income households. ▪ 2,266 lower-income units permitted during the planning period.
Performance Metric:	▪ Number of lower-income units permitted during the planning period.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-5 Facilitate Streamlined and Efficient Development Processes

Goal 5: Implement meaningful actions to affirmatively further fair housing.

Program 5.1 Affirmatively Furthering Fair Housing

The City is committed to Affirmatively Furthering Fair Housing (AFFH) in the community. Key actions include:

- Collaborating with organizations to eliminate housing discrimination in Patterson;
- Supporting diverse housing types to promote mobility; pursuing policies to prevent economic displacement;
- Ensuring affordable housing is distributed citywide to avoid concentrated low-income areas; and
- Applying place-based strategies for neighborhood improvement.

A comprehensive list of all programmatic actions to affirmatively further fair housing are listed in Table 3-5 at the end of this section. This table includes associated objectives, metrics, and timelines for completion for each program.

Program 5.2 Anti-Displacement Strategy

In combination with other programs in this Housing Element, the City will adopt a multi-pronged anti-displacement strategy to address the increasing income gap and rising housing costs. This strategy will focus on encouraging affordable housing production, preserving existing affordable housing, and protecting current residents from displacement, especially in areas located east of State Route 33 – where cost burdens overlap with poverty, overcrowding, and a predominantly Hispanic/Latino population.

The City will explore the following strategies and commit to adopting one or more:

- **Production:** Increase opportunities for multi-family and mixed-use developments citywide to exceed RHNA requirements;

- **Preservation:** Partner with HOST House to promote home-sharing and temporary shelter services. Collaborate with the Stanislaus Regional Housing Authority to acquire affordable units at risk of converting to market rate. Designate a code enforcement specialist to assist property owners of low-income units with code issues, seek funding for rehabilitating substandard multi-family units, and restrict converting existing low-income units to short-term rentals;
- **Protect Current Residents:** Provide links to Stanislaus Regional Housing Authority website for affordable rental units on the City's Fair Housing webpage. Partner with nonprofits serving underserved residents to share information on fair housing and tenant rights. Implement a first right of refusal for Below Market Rate (BMR) units for displaced residents. Develop a rental assistance program to provide financial assistance to extremely low-income renters; and
- **Engagement:** Develop a strategy to distribute information on tenant protections, including source of income, state rent stabilization, and just cause eviction regulations.

The City will engage the public in developing this Anti-Displacement Strategy through community events focusing in areas located east of State Route 33. Outreach will consider high rates of linguistic isolation and provide materials in Spanish.

Timeline:	▪ Complete targeted engagement in 2025-2026. ▪ Adopt Anti-Displacement Strategy by March 2027.
Objectives:	▪ 50 lower-income units beyond the RHNA, with a target of 20 percent for seniors and residents with a disability.
Performance Metric:	▪ Number of lower-income units permitted beyond the RHNA.
Geographic Targeting:	Citywide, specifically, east of SR 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-7 Protect and Stabilize Residential Neighborhoods ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Program 5.3 Affirmatively Market Fair Housing Resources

The City shall continue to promote equal housing opportunity for all persons regardless of race, religion, sex, sexual orientation, marital status, ancestry, nation origin, or color by supporting efforts of community groups which provide counseling, investigatory, legal or referral to victims of discrimination. The City is committed to the following actions:

- Maintain information on state and federal fair housing laws and tenant protections, including source of income, state rent stabilization, just cause eviction regulations, and other related State laws in English and Spanish on the City's website and at City locations (City Hall, police station, library, fire department, schools, etc.) for public distribution;
- Utilize a bilingual individual at the City to refer victims of housing discrimination to Project Sentinel, a HUD-approved housing counseling agency, or to the State Fair Employment and Housing Commission; and
- Work with affordable housing developers and landlords to ensure that affordable housing is affirmatively marketed to households with disproportionate housing needs. The City will notify a broad representation of the community to solicit ideas for housing strategies when they are discussed at Planning Commission or City Council meetings. Specific outreach activities include:
  - Send public notices to all interested public and non-profit agencies and affected property owners, including posting notices at City bulletin boards/locations, in local newspapers, and online at the City's website;
  - Conduct outreach (workshops, neighborhood meetings) to the community as Housing Element programs are implemented and announce workshops/meetings in City newsletter; and
  - Market listings for affordable housing as available.

Timeline:	▪ Ongoing; review annually
Objectives:	▪ 10 fair housing cases reported to local or state agencies during the planning period. ▪ 50 affordable units marketed and occupied during the planning period.
Performance Metric:	▪ Number of fair housing cases reported to local or state agencies. ▪ Number of affordable units marketed to the public.
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-7 Protect and Stabilize Residential Neighborhoods ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Program 5.4 State and Federal Housing Programs and Funding Opportunities

To facilitate the development of affordable housing and support programs for lower-income households, the City will pursue various funding opportunities by:

- Continuously applying for state and federal housing funds to support affordable housing in new and existing units;
- Posting grant and special funding opportunities on the City website with information on housing opportunity sites and potential funding sources to support development; and
- Notifying affordable housing developers, community groups, and organizations serving lower-income households of available housing resources, including the HOST House and Patterson Family Resource Center.

Priority will be given to projects with units affordable to extremely low- and very low-income households. Key funding sources include:

- HUD Funds: The City will apply to HUD funds to facilitate the development of rental housing, homeownership opportunities, special needs housing, and tenant-based rental assistance;
- Low Income Tax Credits: The City will seek federal and state tax credits for the development of lower-income housing;
- State-funded programs: The City will utilize available state funds for affordable housing; and
- Permanent Local Housing Allocation (PLHA) grant: The City will apply for the PLHA Grant, which provides funding to local governments for housing-related projects and programs that assist in addressing the unmet housing needs of their local communities.

Timeline:	▪ Ongoing; pursue funding opportunities annually
Objectives:	▪ Acquire revenue from various state and federal funds for use in affordable housing.
Performance Metric:	▪ Amount of funding gathered and allocated towards low-income households.
Geographic Targeting:	City-wide, prioritize areas east of SR 33
Responsible Agencies:	Community Development Department
Funding Sources:	HUD, PLHA grant, tax credits and other grants and programs, as applicable.
Implementing Policy:	▪ Policy H-1 Ensure Adequate and Diverse Housing Supply ▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-7 Protect and Stabilize Residential Neighborhoods ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Program 5.5 First-Time Homebuyer Downpayment Assistance

The City has previously used HOME funds or alternative funding sources to assist with first-time homebuyer down payment assistance scaled to economic conditions for each qualified household as determined by the City Council. During the 5th Cycle, five households took advantage of the First-Time Homebuyer Downpayment Assistance program. To gauge how the program can be revised, the City will conduct a survey targeting households that previously received downpayment assistance. The City will implement changes to the program by June 2026 aimed at providing assistance to more households.

To advertise and increase use of the First-Time Homebuyer Downpayment Assistance program, the City is committed to the following actions:

- Target Patterson employees to better understand how to restructure the program to meet their housing needs;
- Maintain a webpage on the City's website to inform the public on the First-Time Home Buyer Downpayment Assistance program;
- Promote the program and educate residents and Patterson employees with an annual workshop on City offered first-time homebuyer assistance; and
- Partner with local developers and the Stanislaus Regional Housing Authority to market the program for income-restricted for-sale units.

The City has funding for approximately two loans per year, totaling about 10 total. If a minimum of six households have not taken advantage of the program by Spring 2028, the City will evaluate alternative actions to increase success of the program, and provide a measurable impact on low-income households.

Timeline:	▪ Annually
Objectives:	▪ Provide financial assistance to at least six low-income families per year
Performance Metric:	▪ Number of residents that receive Down-payment assistance each year
Geographic Targeting:	City-wide
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Program 5.6 Housing Choice Voucher (HCV) Program

The City shall continue to cooperate with the Stanislaus Regional Housing Authority in its administration of the Housing Choice (Section 8) rental assistance program. Specifically, the City shall encourage the Housing Authority to seek out and provide assistance to extremely low- and very low-income households. The City shall publicize the Housing Choice Voucher Program rental assistance program through marketing efforts, including brochures made available at City Hall and distributed to local organizations that directly work with lower-income households, such as the Patterson Family Resources Center and HOST House.

Timeline:	▪ Ongoing; review annually
Objectives:	▪ 10 vouchers
Performance Metric:	▪ Number of vouchers utilized during the planning period.
Geographic Targeting:	City-wide, specifically east of SR 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Program 5.7 Targeted Capital Improvement Program Investment

To ensure adequate infrastructure in all areas, particularly moderate resource areas located east of State Route 33 and in the downtown area, as well as newly annexed master planned areas, the City has identified several infrastructure projects in their Capital Improvement Program (CIP) for the 2025-26 fiscal year. These include park enhancements, lighting upgrades, street improvements, bike trails, pedestrian pathways, ADA crosswalk upgrades, storm drain improvements, sewer system upgrades, and water infrastructure improvements.

These projects will be funded through various sources, including CDBG funds, Measure L funds, Urban Green grants, Highway Bridge Program grants, Congestion Mitigation and Air Quality funds, Proposition 4 funds, congressional funding, State Revolving Loan Funds, Community Facility District funds, and impact fees. To further offset and mitigate project costs, the Public Works Department remains proactive in seeking additional funding opportunities.

The City is committed to initiating a minimum of four CIP projects per year throughout the planning period to prioritize infrastructure development, ensuring the timely facilitation of residential unit construction. Notably, the City currently has several projects in the construction phase, including the installation of non-potable waterlines, well site improvements, the Salado Creek Bike Trail, and Rogers Road Bridge enhancements, among others. Additionally, multiple potable

water and sewer improvement projects are in the design phase. Plans are underway to rehabilitate and replace water and sewer infrastructure in the downtown area. This investment is aimed at supporting both current and future commercial and residential development.

TCAC Moderate Resource Areas

As outlined in Appendix A, the area east of State Route 33 is characterized by lower median household incomes, higher poverty rates, a larger proportion of individuals with disabilities, and a concentration of subsidized housing units. Ongoing construction of single-family homes in this area is anticipated to stimulate further investment in infrastructure and amenities, thereby promoting equitable opportunities and improving existing conditions. The area west of Baldwin Road, currently dominated by underutilized industrial land, is a focus of the City's revitalization efforts, with plans to invest in the infrastructure necessary to support future residential development. Consequently, the City will direct CIP resources to these areas to address existing challenges east of State Route 33 and to facilitate revitalization and residential growth west of Baldwin Road.

To further implement revitalization and investment in targeted neighborhoods, the City will host neighborhood clean-ups at least once per year. The City will prioritize areas east of State Route 33 and other low-resource areas for targeted revitalization initiatives.

Master Planned Areas

The City has initiated the planning process to expand the existing wastewater systems within the Zacharias Master Plan area, and is actively exploring various funding sources to secure a construction contract for these expansions. The City is facilitating temporary sewer connections while expansion of the wastewater system is underway and seeking financing for construction of the Zacharias Master Plan area. The City will prioritize infrastructure improvements in the master plan area in an effort to ensure lower-income units are developed to meet the RHNA.

Timeline:	▪ Complete CIP study by June 2026. ▪ Ongoing; review CIP projects annually. ▪ Annual neighborhood cleanup by June 2025.
Objectives:	▪ Direct CIP resources to improving conditions in area east of SR 33, and to facilitate revitalization and residential growth west of Baldwin Rd. ▪ 4 CIP projects initiated per year during the planning period.
Performance Metric:	▪ Number of CIP projects completed during the planning period.
Geographic Targeting:	City-wide, specifically east of SR 33 and west of Baldwin Road
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-3 Conserve and Preserve Existing Affordable Housing ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Program 5.8 Shared Housing Information

Shared housing is another important tool to provide affordable housing units. Shared housing is generally more affordable because a portion of a residence is rented as opposed to an entire unit. Shared housing can also financially help low-income individuals who own their homes and alleviate loneliness. Benefits to lower-income individuals include provision of safe and secure affordable housing in a high-cost market. The City will distribute informational materials from the Stanislaus Regional Housing Authority, display information at City Hall and provide materials to local organizations, such as the Patterson Family Resource Center, Naomi's House, and HOST House. The City will also seek out shared housing providers and resources to expand this housing option.

Timeline:	▪ Ongoing; review program effectiveness annually
Objectives:	▪ Distribute informational material at City Hall and coordinate with Patterson Family Resource Center, Naomi's House, and HOST House. ▪ 15 persons referred to shared housing provider during planning period.
Performance Metric:	▪ Number of persons referred to shared housing provider during the planning period.
Geographic Targeting:	City-wide, specifically east of State Route 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Program 5.9 Expanding Economic Mobility

To address low-income earning potential of lower-income residents, the City will expand low-barrier, low-skill job opportunities by taking the following actions:

1. **Partnering with Community-Based Organizations:** The City will meet with at least three community-based partners annually to identify and create job opportunities for lower-income residents. These partners will provide job readiness training programs, including skills development, resume building, interview preparation, and career counseling, with a focus on expanding employment opportunities for lower-income households in Patterson.
2. **Engaging with the Business Community:** The City will collaborate with the Chamber of Commerce to encourage local employers to identify well-paying entry-level positions. These positions will be actively marketed to Below Market Rate (BMR) tenants in Patterson, ensuring that lower-income residents are aware of and have access to these employment opportunities. The City will aim to connect with at least five employers annually to promote these efforts.

3. **Coordinating Job Readiness Outreach:** The City will coordinate with job readiness service providers and workforce development agencies to conduct targeted outreach to BMR tenants and property managers. This will include disseminating job training programs, workshops, and job opportunities at least quarterly. Additionally, the City will explore hosting annual job fairs in partnership with local employers, specifically targeting lower-income residents and BMR tenants.
4. **Tracking and Reporting:** The City will establish a tracking system to monitor the effectiveness of these initiatives, including the number of job placements, participants in training programs, and partnerships formed. A report will be generated annually to assess progress and adjust strategies as needed to improve outcomes for low-income residents.

This comprehensive strategy aims to create meaningful pathways to employment for lower-income residents, ultimately increasing household income and economic mobility within the community.

Timeline:	▪ Ongoing; review program effectiveness annually
Objectives:	▪ 10 residents assisted per year.
Performance Metric:	▪ Number of low-income residents assisted in obtaining employment annually.
Geographic Targeting:	City-wide, specifically east of State Route 33
Responsible Agencies:	Community Development Department
Funding Sources:	General Fund
Implementing Policy:	▪ Policy H-2 Promote Affordable Housing Development ▪ Policy H-4 Support Housing for Special Needs and Vulnerable Populations ▪ Policy H-8 Promote Fair Housing and Equal Opportunity

Table 3-5 Affirmatively Furthering Fair Housing Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
Fair Housing Enforcement and Outreach				
Program 5.3 Affirmatively Market Fair Housing Resources	▪ Maintain information on state and federal fair housing laws and tenant protections, including source of income, state rent stabilization, just cause eviction regulations, and other related State laws in English and Spanish on the City's website and at City locations (City Hall, police station, library, fire department, schools, etc.) for public distribution; ▪ Utilize a bilingual individual at the City to refer victims of housing discrimination to Project Sentinel, a HUD-approved housing counseling agency, or to the State Fair Employment and Housing Commission; and ▪ Work with affordable housing developers and landlords to ensure that affordable housing is affirmatively marketed to households with disproportionate housing needs. The City will notify a broad representation of the community to solicit ideas for housing strategies when they are discussed at Planning Commission or City Council meetings. Specific outreach activities include: ▪ Send public notices to all interested public and non-profit agencies and affected property owners, including posting notices at City bulletin boards/locations, in local newspapers, and online at the City's website; ▪ Conduct outreach (workshops, neighborhood meetings) to the community as Housing Element programs are implemented and announce workshops/meetings in City newsletter; and ▪ Market listings for affordable housing as available.	Ongoing; Annual Review	City-wide	▪ 10 fair housing cases reported to local or state agencies during the planning period. ▪ 50 affordable units marketed and occupied during the planning period.
Program 5.6 Housing Choice Voucher (HCV) Program	▪ Encourage the Housing Authority to seek out and provide assistance to extremely low- and very low-income households. The City shall publicize the Housing Choice Voucher Program rental assistance program through marketing efforts including brochures made available at City Hall.	Ongoing; Annual Review	City-wide, specifically east of SR 33	10 vouchers (annually)

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
Program 4.14 Housing for Extremely Low-Income Residents	▪ Working with the Housing Authority to provide Housing Choice Vouchers (HCV) to allocate section 8 vouchers to eligible residents; ▪ Referring ELI residents to wrap-around support services and community organizations (i.e. housing resources, transportation assistance, utility assistance, etc.) ▪ Research the feasibility of creating an "Affordable Housing Matching" program in which ELI residents are able to sign up for a list of the City's available affordable housing inventory. If feasible, identify City staff or a consultant to create the program; ▪ Maintain a list on the City's website of resources available to special needs groups, including ELI residents; and ▪ Reach out to non-profit organizations and developers to construct affordable units that are suitable for the needs of large households.	▪ Annually coordinate with the Housing Authority to encourage ELI residents to apply for HCV ▪ Semi-annually update the City's website with resources for ELI (and other special needs) residents ▪ Ongoing referral of ELI residents to support services and community organizations. ▪ Annually coordinate with non-profit organizations and developers	City-wide; specifically east of SR 33 and downtown	▪ Match at least 5 ELI residents with landlords willing to accept HCV ▪ Refer at least 10 ELI residents to social service organizations
Housing Mobility				
Program 1.9 Supporting Transportation Demand Strategies & Reducing Parking Requirements for Multi-Family Residential Development	▪ Collaborate with StanRTA to develop an incentive program for developers to provide bike parking and transit passes to residents of new affordable residential units for a minimum of 10 years; ▪ Facilitate use of StanRTA by providing information on bus frequency and transit stop locations in common areas for the life of the program; and ▪ Reduction of minimum parking standards for multi-family uses in multi-family zones by December 2026.	▪ Develop transportation demand management strategy by June 2027 ▪ Amend Municipal Code to reduce parking standards by December 2026	City-wide	50 transit passes (per year) with new affordable units
Program 4.1: Reasonable Accommodation and	▪ Amend the Zoning Ordinance to revise the findings for approval to remove subjective findings.	▪ Amend Municipal Code by December 2026.	City-wide, with emphasis in	▪ 5 accessible units for residents with disabilities;

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
Housing for Persons with Disabilities	▪ Amend the Zoning Ordinance to limit the parties eligible to appeal a request for reasonable accommodation to the applicant or the personal beneficiary. ▪ Conduct annual meetings with developers to encourage development of projects targeted to persons with disabilities; ▪ Conduct annual educational workshops for landlords and tenants; ▪ Apply for County, State, and Federal funding as available (including ARPA funds) for housing construction and rehabilitation for persons with disabilities; and ▪ Continue enforcing Building Code requirements for the inclusion of adaptable disabled accessible units in multifamily development projects that are subject to such requirements.	▪ Conduct meetings with developers annually. ▪ Host educational workshops for landlords and tenants annually. ▪ Apply for Funding as available from State and Federal sources.	areas east of SR 33	▪ Match 5 landlords with accessible units to tenants
Program 4.2 Universal Design to Encourage Housing for Persons with Limited Mobility	▪ Adopt an ordinance to allow for Universal Design elements that address limited lifting (e.g. roll-in showers and grab bars), limited mobility (e.g. push/pull lever faucets, wide swing hinges) and limited vision (e.g. additional stairwell and task lighting) pursuant to Health and Safety Code section 17959, at the next International Building Code Update Adoption.	Adopt Universal Design Ordinance by December 2026	City-wide, with emphasis in areas east of SR 33	30 accessible units by the end of planning period
Program 4.3 Residential Care Facilities	Implement the following amendments to the Municipal Code: ▪ Residential Care Facilities Without Licensable Services: Residential care facilities that function as single-family residences and do not offer licensable services shall be permitted in zones that permit single-family residential uses. These homes shall only be subject to the general health, safety, and zoning laws applicable to all single-family residences, regardless of having more than six residents. Since these homes do not provide licensable services, they should be treated like any other single-family residence; ▪ Residential Care Facilities with Licensable Services for Six or Fewer Residents: Residential care facilities operating as single-family residences and providing licensable services to six or fewer residents shall be permitted in zones that permit single-family residential uses. They shall only be subject to the general health, safety, and zoning laws applicable to all single-family residences, in compliance with the Health and Safety Code protections for these smaller, licensed group homes; and	Amend Municipal Code by December 2026	City-wide	Amend Municipal Code to define and establish permitting procedures for residential care facilities

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
	▪ Residential Care Facilities with Licensable Services for More Than Six Residents: Residential care facilities that provide licensable services to more than six residents shall require a conditional use permit to be permitted in zones that permit residential uses. Reasonable accommodations in these permitting processes shall be considered when an application for reasonable accommodation is submitted.			
Program 4.4 Facilitating the Development of Affordable Senior Housing – Phase 2 Las Palmas Senior Apartments	Support the Stanislaus Regional Housing Authority's plans for the 16-unit expansion of the Las Palmas Senior Housing Complex by sourcing potential funding opportunities for development, including CDBG, HOME, and other available funding. Affirmatively market by: ▪ Posting information on the City website and distributing information via mail; ▪ Providing materials at City Hall and the Hammon Senior Center; ▪ Distributing information at City events like the Wednesday Farmer's Market; and ▪ Working with local nonprofits that assist low-income households, including the Patterson Family Resource Center and HOST House.	Complete by June 2031	City-wide, specifically, 1075 Las Palmas Avenue	16 deed-restricted very low-income senior housing units
Program 4.5 Family-Friendly Housing	▪ Promote multi-family housing designs and unit mixes that attract multigenerational households by encouraging developers to include housing features such as larger units with more bedrooms (including four-bedroom units) and on-site amenities like usable outdoor open spaces for multigenerational use. ▪ Encourage the inclusion of multipurpose rooms that can be used for after-school homework clubs, computer labs, art activities, or other resident programs. ▪ Incentivize developers by offering expedited permit processing, fee waivers, fee deferrals or reductions by 50 percent for projects that include family-sized deed-restricted units with four or more bedrooms. ▪ Research options to expand regulatory incentives to encourage the development of larger units.	Develop regulatory incentive by June 2026	City-wide, specifically east of State Route 33	15 family-friendly designated units (four-bedroom units)
Program 4.10 Single-Room Occupancy Units (SROs)	▪ Amend the Municipal Code to define single-room occupancy units and permit them by right in all zones that allow mixed-use development.	Amend Municipal Code by December 2026	City-wide	N/A

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
Program 4.11 Employee Farmworker Housing	▪ Contacting non-profit developers annually to identify opportunities for the development or improvement of housing for employees and farmworkers; and ▪ Coordinating and participating annually with regional organizations that serve farmworkers, including non-profits, academic institutions, and employers (e.g.: Stanislaus Regional Housing Authority, Office of Migrant Workers, Patterson Family Resource Center, Self-Help Enterprises, Farmworkers Institute of Education and Leadership) to raise awareness, share and employ strategies, and identify or target new resources. ▪ Reaching out to local farm employers to identify housing needs, and seeking funding to support further development or rehabilitation of farmworker housing; ▪ Working with partner organizations and agencies to conduct an additional survey of farmworker housing needs at least once during the planning period and adjusting farmworker-serving programs to match updated needs if appropriate; ▪ Coordinating annually with organizations that represent farmworkers; ▪ Annually monitoring the status of farmworker housing as part of their annual report to HCD on Housing Element progress and evaluate if City efforts are effective in facilitating the provision of farmworker housing. If appropriate, the City will make necessary changes to enhance opportunities and incentives for farmworker housing development; and ▪ Providing bilingual materials on available resources and financial assistance on the City's website and with printed materials at City offices, Patterson Public Library and community centers within the city.	▪ Amend Municipal Code by December 2026. ▪ Contact non-profit developers to discuss development opportunities annually. ▪ Coordinate with regional organizations annually.	City-wide	N/A
Program 4.12 Accessory Dwelling Units (ADUs)	▪ Amend its ADU Ordinance to comply with State law, including recent changes pursuant to AB 345, AB 3182, AB 68, AB 881, SB 13, AB 587, AB 670, and AB 671. ▪ Update Building Code to align with State requirements for ADUs. ▪ Develop a webpage on the City's website to inform the public on the benefits of ADUs; post informational materials, such as the	▪ Amend ADU Ordinance by December 2026. ▪ Develop ADU informational webpage and pre-	City-wide	Construction of 25 ADUs

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
	Accessory Dwelling Unit Handbook published by the State Department of housing and Community Development (HCD); post local regulations, and example floor plans; ▪ Provide pre-approved ADU plans to provide a more streamlined process for property owners and developers; ▪ Promote ADU development with an annual workshop on ADU development with building inspector and planners; ▪ Waive City building permit fees for units that are deed restricted for low- or very low-income units and for property owners of households that qualify as moderate to very low-income; and ▪ Pursue funding opportunities to promote the development and affordability of ADUs in the City. Funding sources may include CalHFA ADU Grant Program; CalHome Program; LEAP Grants; REAP Grants; and SB 2 Planning Grants.	approved ADU plans by June 2025. ▪ Host workshop on ADU development annually. ▪ Pursue funding opportunities annually.		
Program 1.6 Affordable Housing Development	▪ Conducting outreach to interested developers and assisting with identification of appropriate sites for affordable housing; ▪ Working with or assisting nonprofit developers to pursue affordable housing funds available at local, state, and federal levels to implement the goals and policies of this Housing Element; ▪ Providing expedited planning review and processing for affordable housing projects, and offer pre-application consultation to ensure maximum development potential is achieved; ▪ Reducing planning permit entitlement fees for affordable housing projects with deed-restricted units by 50 percent and deferring payment of impact fees until prior to issuance of Certificate of Occupancy; and ▪ Seeking cost-effective methods to reduce housing construction costs.	▪ Annually meet with housing developers to discuss opportunities for affordable housing development. ▪ Research methods to reduce constructions costs and present to Planning Commission by June 2027. ▪ Establish procedures to comply with AB 2295 by June 2026. ▪ Develop landlord-tenant matching by June 2027.	City-wide	▪ Direct staff to research technology driven construction methods in an effort to improve quality, reduce costs, and decrease time to occupancy by conducting an informational session with the Planning Commission by June 2027 with an emphasis on modular homes, prefabricated units, and ADUs. ▪ Establish procedures to comply with AB 2295. ▪ Monitor the number of lower-income housing units permitted during the planning period with a goal of achieving

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
		▪ Annually monitor lower-income housing units permitted during the planning period.		1,770 lower-income units to satisfy the RHNA.
Program 1.5 Inclusionary Housing Requirements	▪ To encourage the construction of affordable housing amid expected development growth, the City will dedicate staff to manage the housing element, focusing on implementing and enforcing the Inclusionary Ordinance to promote affordable unit construction over in-lieu fee payments. ▪ Additionally, to ensure compliance with recent changes to State Density Bonus Law, the City will review and update its Inclusionary Ordinance.	Review and update, if necessary, the City's Inclusionary Housing Ordinance to comply with State Density Bonus Law by December 2026.	City-wide	▪ Ensure City's Inclusionary Housing Ordinance complies with State Density Bonus Law. ▪ Achieve 100 lower-income affordable units between 2023-2031 through density bonus and inclusionary housing.
Program 1.7 Establish Procedures for SB 35 and SB 330	▪ Create an SB 35 checklist and written procedures for processing SB 35 applications to ensure efficient and complete application processing and will update the documents in conformance with any changes to state law within twelve months of adoption of new laws. ▪ Develop an application for SB 330 in conformance with State law.	Adopt checklist and written procedures by June 2026 and within 12 months of any change to the law that would impact the City.	City-wide	Expedite review process for affordable residential projects.
Place-Based Strategies for Neighborhood Revitalization				
Program 5.4 State and Federal Housing Programs and Funding Opportunities	▪ Continuously applying for state and federal housing funds to support affordable housing in new and existing units; ▪ Posting grant and special funding opportunities on the City website with information on housing opportunity sites and potential funding sources to support development; and ▪ Notifying affordable housing developers, community groups, and organizations serving lower-income households of available housing resources, including the HOST House and Patterson Family Resource Center.	Ongoing; review annually	City-wide, prioritize areas east of SR 33	Acquire revenue from various state and federal funds for use in affordable housing.
Program 2.1 Property Inspection/Code Enforcement	▪ Ensure all existing units meet basic health and safety standards by enforcing local codes. Code enforcement staff will regularly monitor neighborhoods, address violations as they arise, and respond to complaints.	▪ Ongoing; review annually. ▪ Report code violations and	City-wide, specifically east of State Route 33	▪ Investigate and address at least 5 code violations per month.

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
	▪ Proactively offer information and assistance to property owners, including grants and loans through the City's Minor Home Repair Program to address health and safety hazards. Other available programs include weatherization grants (Turlock Irrigation District, PG&E, State LIHEAP), home painting programs, and housing rehabilitation assistance. Affirmatively market these resources by: • Posting information on the City's website; • Providing written materials to community groups and organizations representing lower-income households, at City Hall, the Wednesday Farmer's Market, and through various outlets, such as the quarterly City newsletter; • Distributing program details directly to property owners via mail; and • Sharing materials with community groups, including the Patterson Family Resource Center, which serves extremely-low- and low-income families. ▪ Monitor the 254 deed-restricted affordable units annually to ensure compliance with protective covenants.	enforcement activities to the City Council on monthly basis. ▪ Multi-family rental inspections (December 2030)		▪ 56 units rehabilitated (24 very low-, 24 low-, and 8 moderate-income units) during the planning period.
Program 5.7 Targeted Capital Improvement Program Investment	▪ Direct CIP resources to improving conditions in area east of SR 33, and to facilitate revitalization and residential growth west of Baldwin Rd; and ▪ 4 CIP projects completed per year during the planning period.	▪ Complete CIP study by June 2026. ▪ Ongoing; review CIP projects annually. ▪ Annual neighborhood cleanup by June 2025.	City-wide, specifically east of SR 33 and west of Baldwin Road	▪ Direct CIP resources to improving conditions in area east of SR 33, and to facilitate revitalization and residential growth west of Baldwin Rd. ▪ 4 CIP projects completed per year during the planning period.
Tenant Protection and Anti-Displacement				
Program 1.2 Replacement Housing Requirements	▪ Amend the Municipal Code to include the replacement housing requirements on non-vacant sites used to fulfill the City's lower-income RHNA.	Amend Municipal Code by December 2025	City-wide	Pursuant to State Law, amend the Municipal Code by the end of December 2025 to include the

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
	▪ Monitor development on non-vacant sites identified in the Site Inventory and ensure that any development, as a condition of project approval, replace the existing units occupied by or deed restricted for occupancy by lower-income households are replaced.			replacement housing requirements on non-vacant sites used to fulfill the City's lower-income RHNA
Program 2.1 Property Inspection/Code Enforcement	▪ Ensure all existing units meet basic health and safety standards by enforcing local codes. Code enforcement staff will regularly monitor neighborhoods, address violations as they arise, and respond to complaints. ▪ Proactively offer information and assistance to property owners, including grants and loans through the City's Minor Home Repair Program to address health and safety hazards. Other available programs include weatherization grants (Turlock Irrigation District, PG&E, State LIHEAP), home painting programs, and housing rehabilitation assistance. Affirmatively market these resources by: • Posting information on the City's website; • Providing written materials to community groups and organizations representing lower-income households, at City Hall, the Wednesday Farmer's Market, and through various outlets, such as the quarterly City newsletter; • Distributing program details directly to property owners via mail; and • Sharing materials with community groups, including the Patterson Family Resource Center, which serves extremely-low- and low-income families. ▪ Monitor the 254 deed-restricted affordable units annually to ensure compliance with protective covenants.	▪ Ongoing; review annually. ▪ Report code violations and enforcement activities to the City Council on monthly basis. ▪ Multi-family rental inspections (December 2030)	City-wide, specifically east of State Route 33	▪ Investigate and address at least 5 code violations per month. ▪ 56 units rehabilitated (24 very low-, 24 low-, and 8 moderate-income units) during the planning period.
Program 2.2 Conservation of Existing Affordable Housing	▪ Annually monitor the affordable units by maintaining contact with property owners regarding their intent to maintain the units as affordable housing, with the goal of preserving 254 affordable units in the inventory. ▪ When a Notice of Intent to convert from low-income housing to market-rate housing is received (three years in advance pursuant to State law), work with property owners to ensure that the tenants are properly noticed and provided information on potential	▪ Ongoing; annually monitor. ▪ Report code violations and enforcement activities to the City Council on monthly basis.	City-wide, specifically east of State Route 33	Preserve 254 affordable units in the inventory

Program	Specific Commitment	Timeline	Geographic Targeting	8-Year Metrics
	resources for assistance, and any applicable displacement and relocation requirements are complied with. On an ongoing basis, work with nonprofit housing providers to pursue funding to preserve and improve existing affordable housing.			
Program 5.2 Anti-Displacement Strategy	▪ Adopt a multi-pronged anti-displacement strategy to address the increasing income gap and rising housing costs, with the goal of 50 lower-income units beyond the RHNA.	▪ Complete targeted engagement in 2025-2026. ▪ Adopt Anti-Displacement Strategy by March 2027	Citywide, specifically, east of SR 33	50 lower-income units beyond the RHNA, with a target of 20 percent for seniors and residents with a disability.

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4.0
Housing Resources and Sites Inventory

This chapter documents the methodology and results of the housing sites inventory analysis conducted to demonstrate the City of Patterson's ability to satisfy its share of the region's future housing need. Infrastructure, services, and financial and administrative resources that are available for the development, rehabilitation, and preservation of housing in the City of Patterson are also discussed in this chapter.

4.1 Regional Housing Needs Allocation (RHNA)

State law requires each jurisdiction to play a role in meeting the region's housing need. Jurisdictions must demonstrate that their land inventory can accommodate their share of the region's projected growth. This section evaluates Patterson's land inventory to meet future housing needs.

The City's Housing Element update covers the planning period from June 2023 to December 2031 (6th Cycle Housing Element). Table 4-1 identifies the City's 2023-2031 RHNA. Patterson's share of the regional housing need, allocated by the Stanislaus Council of Governments (StanCOG) based on growth trends, income distribution, and growth capacity, is 3,716 units across five income categories.

Table 4-1 City of Patterson Regional Housing Needs Allocation (2023-2031)

Income Category	Number of Units
Extremely Low-Income (<30% AMI)*	523
Very Low-Income (30-50% AMI)	523
Low-Income (50-80% AMI)	724
Moderate-Income (80-120% AMI)	593
Above Moderate-Income (>120% AMI)	1,353
Total	3,716

SOURCE: StanCOG 6th Cycle Regional Housing Needs Allocation Plan, 2022

NOTE: *The RHNA does not project the need for extremely low-income units, but pursuant to State law (AB 2634), the City must project its extremely low-income housing needs based on Census income distribution or assume 50 percent of the very-low-income units required by the RHNA as extremely low-income units.

Regional Housing Needs Allocation Buffer

To ensure sufficient capacity in the housing element to meet RHNA requirements throughout the planning period, and in accordance with the No Net Loss Law (Government Code Section 65863), Housing and Community Development (HCD) recommends that jurisdictions include a buffer of at least 15 to 30 percent more capacity than required, particularly for lower-income housing. The No Net Loss Law requires sufficient adequate sites to be available at all times throughout the RHNA planning period to meet the jurisdiction's remaining unmet housing needs for each income category.[1]

4.2 Capacity to Accommodate 2023-2031 RHNA

The City has employed a multifaceted approach to meet its RHNA. This includes crediting pipeline projects (approved or pending development), projecting accessory dwelling unit (ADU) construction, and advancing the development of large-scale projects within the Zacharias and Baldwin Master Plan areas. In addition, the City has identified vacant and underutilized sites that are available for development, including two sites previously identified in the 5th Cycle Housing Element.

This approach ensures a diverse range of housing options, evenly distributed throughout the city, to address the varied needs of the community. By targeting specific areas for increased housing options and improvements to infrastructure and public services, the City is addressing housing demands across various income levels and neighborhoods. This strategy promotes balanced growth and fosters community inclusivity by ensuring that new development provides a range of housing opportunities and also enhances the quality of life through improved amenities and services.

Table 4-2 identifies the methods used to accommodate the City's 2023-2031 RHHA of 3,716 units, including a buffer.

Adjusting RHNA

Due to an unaccommodated need from the 5th cycle planning period, the City's "adjusted RHNA" includes an additional 196 lower-income units, further increasing the housing targets. In total, the City has identified sufficient capacity for 5,264 housing units, resulting in a surplus of 1,693 units, which represents a 47 percent buffer above the required RHNA. Further discussion of the City's 5th Cycle Housing Element unaccommodated need, pipeline projects credited toward the RHNA, and ADUs projected to develop during the planning period is provided below.

[1] https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf page 22

Table 4-2 Capacity to Accommodate 2023-2031 RHNA

Housing Resource	Very Low-Income Capacity	Low-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity
2023-2031 RHNA	1,046	724	593	1,353	3,716
5th Cycle Unaccommodated Need	+98	+98	--	--	+196
Adjusted RHNA (6th Cycle RHNA +5th Cycle Unaccommodated Need)	1,144	822	593	1,353	3,912
Pipeline Projects	--	--	-96	-245	-341
Remaining RHNA	1,144	822	497	1,108	3,571
Zacharias Development Area	356	194	324	2,366	3,240
Baldwin Ranch South Development Area	--	--	91	214	305
Vacant/Underutilized Sites	703	588	83	--	1,374
Projected ADUs (not including MP areas)	15	15	15	5	50
Lakeside Hills 15% ADUs	79	79	79	26	263
Baldwin Ranch South 15% ADUs	10	10	10	2	32
Total Net Capacity	1,163	886	602	2,613	5,264
Surplus Units	19	64	105	1,505	1,693
Percent of Surplus Units	102%	108%	121%	236%	147%

SOURCE: City of Patterson, 2024

5th Cycle Unaccommodated Need

During the 5th Cycle Housing Element planning period, the City of Patterson was assigned a RHNA of 2,491 housing units. Among these, 1,044 units were designated for lower-income housing. However, the City did not have sufficient capacity to accommodate all 1,044 lower-income units, resulting in a shortfall of 496 lower-income sites. The City committed to rezoning land to High Density Residential to accommodate the shortfall of units. In 2020, the City rezoned 13 acres located at Weber Avenue and First Street to High Density Residential to accommodate approximately 300 lower-income units. This accounts for approximately 60 percent of the rezoning efforts needed to make up the shortfall of 496 units. A remaining shortfall of 196 units must be planned for in the 6th cycle planning period.

Government Code Section 65584.09 classifies these as an "unaccommodated housing need," which the City must address in addition to the 6th cycle RHNA allocation of 3,716 units. Specifically, the City must ensure the affordability of the 196 unaccommodated units from the 5th cycle, comprising 98 very low-income and 98 low-income units.

Table 4-2 above calculates the City's "adjusted RHNA," which accounts for the 5th cycle unaccommodated need of 196 lower-income units, resulting in a total of 3,912 units that the City is required to plan for during the 6th cycle planning period. Pursuant to Government Code Section 65584.09, the City is obligated to rezone and/or annex suitable sites to address the 5th cycle unaccommodated housing needs within the first year of the new planning period, ending on December 31, 2024.

To address this adjusted RHNA— affecting very low- and low-income units—the City will implement rezoning efforts to facilitate higher-density developments suitable for lower-income housing. Program 1.11 establishes specific rezoning actions to ensure the City meets its lower-income RHNA targets (refer to Chapter 3). Through these rezoning efforts, the City's site inventory identifies sufficient sites to accommodate the City's lower-income RHNA, including the 5th cycle unaccommodated need.

Credited Pipeline Projects

Approved and permitted residential developments not yet built ("pipeline projects") can be counted toward the City's RHNA for the 6th Cycle Housing Element, provided the City demonstrates that the units will be completed by the end of the planning period. Similarly, units in projects that received a certificate of occupancy on June 30, 2023 or later, are also eligible for RHNA credit. Affordability is based on actual or projected sale prices, rent levels, or other mechanisms that establish the income category of the units. Single-family homes are typically sold at market rates without affordability covenants, while multi-family or single-family developments using density bonuses, subsidies, or other affordability mechanisms are subject to rent or sale price restrictions. Local, state, or federal regulations determine which income categories each development must serve.

The City has two active projects expected to provide 341 market-rate housing units. Table 4-3 identifies these projects, which contribute 96 moderate- and 245 above moderate-income units towards the City's RHNA allocation. Further details on these projects and timelines are provided below.

As reported in Chapter 1, Housing Needs Assessment, housing tenure in Patterson has primarily been owner-occupied, averaging 68 percent from 2010 to 2022, while renter-occupied households averaged 32 percent. The City's pipeline projects include a mix of townhomes and single-family developments, offering both rental and ownership opportunities. However, none of these developments are expected to be deed-restricted.

Table 4-3 Pipeline Projects

Site ID	Project Name	VLI Units	LI Units	MI Units	AM Units	Total Units	Entitlement Status	Affordability/Tenure
16	VOP Lot 14	0	0	24	74	98	Approved	Market-Rate/rental
17	Sycamore Ranch II	0	0	72	171	243	Approved	Market-Rate/ownership
	Total	0	0	96	245	341	--	--

SOURCE: City of Patterson, 2024
NOTE: VLI = very low-income; LI = low-income; MI = moderate-income; AM = above moderate-income.

VOP Lot 14

The VOP Lot 14 project, a 98-unit townhouse development, is set to be constructed on North First Street in the northeastern quadrant of the city, covering 5.73 acres. Originally designated as Medium Density Residential (MDR), with an allowable density of 5.1 to 12 dwelling units per acre, the City facilitated development of the project by offering a density swap, increasing the density to 17 dwelling units per acre. This initiative demonstrates the City's proactive efforts to support higher density residential development through strategic incentives. The townhouses will range in size from 1,125 to 1,228 square feet and will be priced at market rate available for rent. Given the small size of the units, it is reasonable to assume they will accommodate a mix of moderate- and above-moderate-income households.

The development has obtained planning entitlements but has not yet received building permits. The developer is actively working to secure financing for the project, and the City is supporting these efforts by assisting in identifying funding sources and prioritizing the expedited issuance of building permits. As the site is an infill development, no new or expanded infrastructure is required for construction. As discussed in Chapter 2, Constraints Assessment, potable water supply is a challenge for new development city-wide. However, the City is proactively addressing existing overdraft conditions and working to secure additional supply. Program 1.15 outlines the specific actions the City is taking to enhance water supply and facilitate residential development throughout the planning period (see program in Chapter 3). There are no other known barriers impacting development of this project.

Sycamore Ranch Phase II

The Sycamore Ranch Phase II project, a 243-unit single-family development, is planned along Olive Avenue and Sycamore Avenue in the northeastern section of Patterson, covering 46.23 acres. With an average lot size of 4,600 square feet, each unit will be priced at market rate available for ownership.

The development has obtained both planning entitlements and building permits, and the grading process is currently underway to prepare the site for construction of units, which are anticipated to be completed by summer/fall 2026.

Similar to VOP Lot 14 above, since the site is an infill development, no new or expanded infrastructure is required for construction. Provisions outlined in Program 1.15 include the City's commitment to ensuring that sufficient potable water supply will be available for the development (see Chapter 3). There are no other known barriers impacting development of this project.

Several developers are being considered for the project, including KB Homes, the developer of Sycamore Ranch Phase I. The City is actively engaging with multiple developers to encourage a variety of unit sizes that support a broader range of affordability. A key priority is to incorporate an affordable component within the project, with a particular focus on producing units priced to be attainable for moderate-income households—targeting the mid- to high-$300,000 range.

As noted throughout this Housing Element, the City has successfully negotiated the inclusion of affordable units in other projects through the use of development concessions such as density swaps, reduced parking requirements, and other incentives. Building on this success, the City is confident that similar strategies can be applied to Sycamore Ranch Phase II. Through ongoing discussions and the strategic use of development incentives, the City anticipates the inclusion of moderate-income units within this project during the planning period.

KB Homes, a leading developer in the region, is also spearheading the Acacia Homes project in the Patterson Ranch community, further strengthening the housing market in this area. The active development in the northeastern region reflects strong growth, with KB Homes driving increased housing opportunities and contributing to economic development and community expansion.

By introducing market-rate housing to the northeastern region, classified as a moderate resource area, the City aims to stimulate new development opportunities. This strategic initiative is expected to attract investment, improve infrastructure, expand public services, and enhance community amenities. Ultimately, these efforts are intended to drive better economic outcomes for the area, fostering growth and increased quality of life for residents.

Projected Accessory Dwelling Units

Government Code Section 65583.1(a) allows a city or county to identify sites for accessory dwelling units (ADU) and junior accessory dwelling units (JADU) based on the number of ADUs developed in the prior housing element planning period whether or not the units are permitted by-right, the need for these units in the community, the resources or incentives available for their development, and any other relevant factors, as determined by the department.

In accordance with state law, ADUs anticipated to be built between 2023 and 2031 are also credited towards the City's RHNA. The City of Patterson Building Division permitted two ADUs in both 2020 and 2021, and one in 2022, averaging two ADUs per year. Based on past trends, this would result in 16 ADUs being permitted during the 2023-2031 planning period. However, despite the limited number of ADUs in the previous cycle, public interest in ADU construction has increased significantly. During the November 12 Joint Planning Commission/City Council Community Workshop, residents expressed interest in ADU development, including pre-approved ADU/JADU

plans and educational resources for initiating the planning process. The City also conducted a Housing Needs Survey during the public comment period, which confirmed community interest in ADU/JADU development in Patterson.

Furthermore, the FHA recently expanded access to mortgage financing for homes that have or will include ADUs. Specifically, the updated loan policies allow for the inclusion of rental income from the ADU in the borrower's qualifying income and would allow more borrowers to qualify for FHA financing for properties with ADUs.[2] Coupled with increased community and developer interest in constructing ADUs, the City anticipates an increase in ADU development during the planning period.

To encourage ADU development, the City is promoting pre-approved ADU designs to simplify the process, reducing design challenges and facilitating quicker approvals. Additionally, under Program 4.12 of this Housing Element, the City will waive building permit fees for ADUs deed-restricted for at least five years for low- or very low-income units or for property owners qualifying as moderate- to very low-income (see Chapter 3). The City will also offer funding, including low-interest loans, to support ADU construction and affordability, and will host annual workshops with building inspectors and planners to engage and educate residents. Additionally, the City proposes Program 4.12, which establishes an ADU Amnesty Program to legalize existing, unpermitted ADUs and JADUs (see Chapter 3). To incentivize property owners to legalize their ADU/JADUs, the City is committed to offering incentives including but not limited to waiver of all fees and penalties for unpermitted units, low-cost initial inspections, and significant reductions or waivers of planning, building, and other permit fees.

Through these efforts, the City anticipates a significant increase in ADU production, projecting a total of 50 ADUs to be permitted during the 6th cycle planning period.

The Association of Bay Area Governments (ABAG) conducted an analysis of ADU affordability and concluded approximately 30 percent of ADUs are affordable to very low-income households, 30 percent affordable to low-income households, 30 percent affordable to moderate-income households, and 10 percent affordable to above-moderate income households.[3] HCD has accepted this methodology for distributing ADUs according to income category. Therefore, the City of Patterson ADU assumptions will distribute ADUs according to income as follows: 15 very low-; 15 low-; 15 moderate-; and 5 above moderate-income ADUs for a total of 50 ADUs.

4.3 Residential Site Inventory

Government Code Section 65583(a)(3) requires jurisdictions to demonstrate in the Housing Element that the land inventory is adequate to accommodate their share of regional growth. "Default" density

[2] https://www.hcd.ca.gov/sites/default/files/docs/policy-and-research/ADUHandbookUpdate.pdf
[3] ABAG. Using ADUs to satisfy RHNA Technical Memo. https://abag.ca.gov/sites/default/files/documents/2022-03/ADUs-Projections- Memo-final.pdf

standards are used to estimate potential units by income range. According to HCD, a density of 20 or more dwelling units per acre, primarily for higher-density multi-family developments, supports housing for low- and very low-income households in cities like Patterson. Further, Government Code Section 65583.2 specifies that parcels between 0.5 and 10 acres, zoned for residential development at 20 dwelling units per acre or more, are suitable for lower-income housing in Patterson.

Following adjustments to the City's RHNA, which include accommodating the 5th Cycle Housing Element's unaccommodated need of 496 lower-income units, crediting pipeline projects, and projecting ADU development, the City faces a remaining RHNA of 3,571 units. Of these, 1,114 units are allocated for very low-income households, 822 for low-income, 497 for moderate-income, and 1,108 for above moderate-income households. To address this remaining need, the City has identified the Zacharias and Baldwin Ranch Master Plan development areas and 12 vacant and underutilized sites. Figure 4-1 illustrates identified housing opportunity sites included in the site inventory.

Zacharias and Baldwin Ranch Master Plan Areas[4]

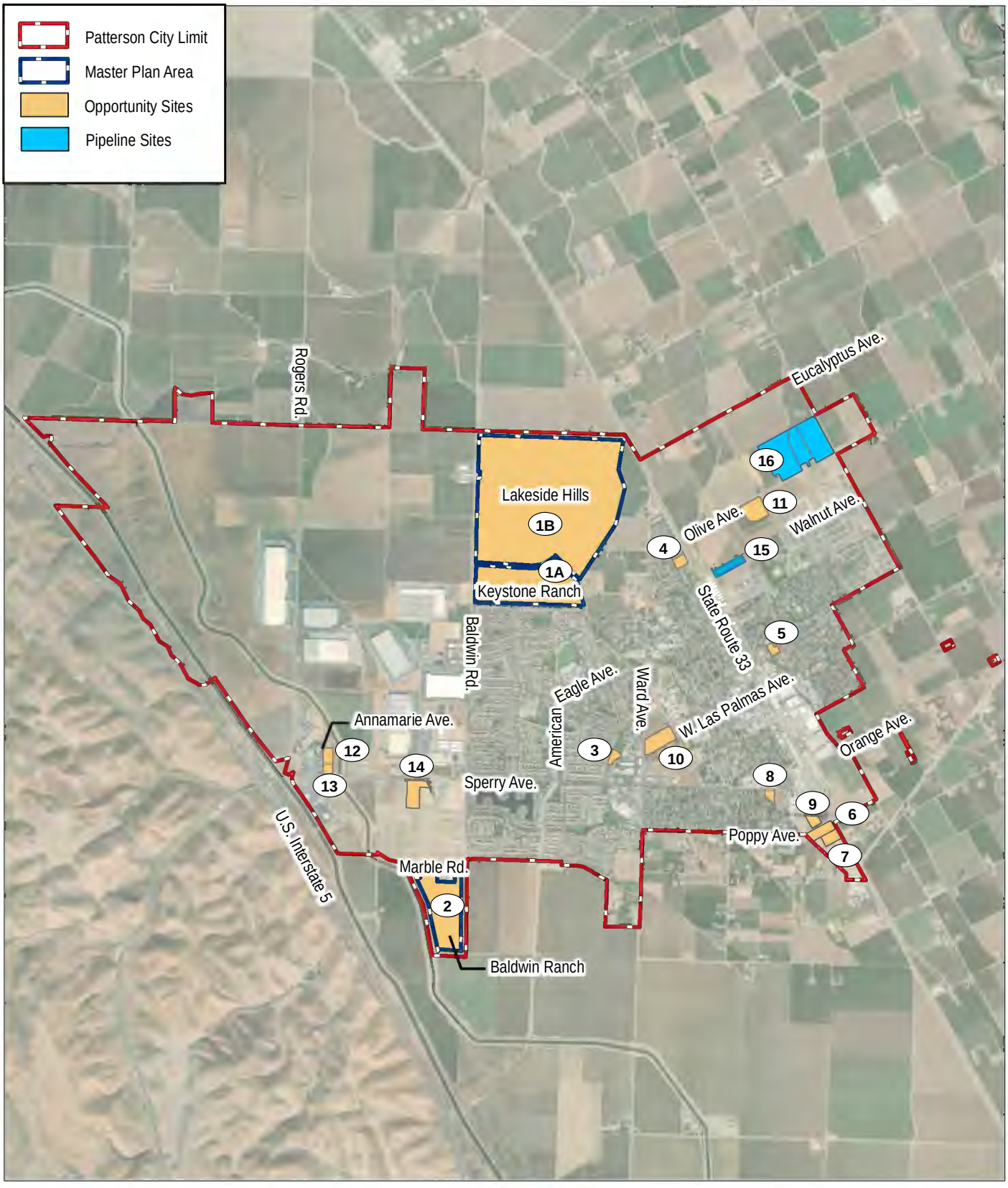
Zacharias Development Area

The Zacharias development area covers 1,296.4 acres in the northern part of Patterson, bordered by Rogers Road to the west, Zacharias Road to the north, the California Northern Railroad tracks and Ward Avenue to the east, and existing residential and business park areas to the south. A recharge basin and flood retention area are located north of Zacharias Road. This area was annexed in Spring 2024 and is slated for infrastructural improvements beginning in Summer 2025 and development in Fall 2025. The master-planned community will include a mix of residential and commercial uses, parks, and schools. The City is continuing to work with the developer on the vesting tentative maps.

Residential Potential

The Zacharias development area is designed to accommodate 5,091 residential units across 814.3 acres. Approximately 4,268 units are allocated to low and medium-density developments such as single-family homes, townhouses, and duplexes, and 823 units are designated for high-density and mixed-use developments. The Zacharias development area permits residential densities ranging from 1.0 to 25.0 dwelling units per acre. There are five project areas within the Zacharias development area, including Zacharias Ranch and TPF, expected to provide moderate and above moderate-income units; Keystone Ranch and Lakeside Hills offering housing for all income levels; and Ivy Rose Gardens, anticipated to serve moderate and above moderate-income households. Table 4-4 outlines the residential opportunities according to land use designation.

[4] The Zacharias and Baldwin Ranch Master Plan area refers to the Baldwin Ranch South development area.



Source: ESRI 2024,
Stanislaus County GIS 2024

Figure 4-1

Identified Housing Opportunity Sites

City of Patterson 6th Cycle Housing Element

Table 4-4 Zacharias Development Area Residential Land Uses

Zoning	Land Use	Density Du/Ac.	Area (Acres)	Units	Percent Total Units
LR	Low Density Residential	1.0 – 5.0	216.4	809	15.9%
MR	Medium Density Residential	5.1 – 12.0	539.1	3,459	67.9%
HR	High Density Residential	12.1 – 25.0	30.6	538	10.6%
MU	Mixed Use	12.0 – 25.0	28.2	285	5.6%
Total			814.3	5,091	100%

SOURCE: City of Patterson, Zacharias and Baldwin Ranch Master Plan, August 2022

Keystone Ranch and Lakeside Hills are the only project areas designated to accommodate high-density and mixed-use developments for lower-income residential units within the Zacharias development area. As such, these are the only project areas included in the Site Inventory.

Inclusionary Housing Requirement

The Master Plan is subject to the City's Inclusionary Housing Ordinance, adopted in 2006, which requires the provision of housing for moderate-, low-, and very low-income households. A minimum of 15 percent of all dwelling units within the Master Plan Area must be designated as affordable for these income categories. For affordable for-sale units, 60 percent must be allocated to moderate-income households, with the remaining 40 percent designated for low-income households. Similarly, for affordable rental units, 40 percent must be reserved for very low-income households, while 60 percent must accommodate low-income households. These inclusionary housing requirements have been incorporated into the Keystone Ranch and Lakeside Hills development areas included in the Site Inventory.

According to the Master Plan, Keystone Ranch is planned for medium- and high-density residential development, with a total of 719 units. The Site Inventory allocates these units to accommodate 17 very low-, 26 low-, 64 moderate-, and 612 above moderate-income units. Lakeside Hills is planned for medium- and high-density residential development, along with mixed-use residential, totaling 2,521 units. The Site Inventory allocates these units to accommodate 339 very low-income, 168 low-income, 260 moderate-income, and 1,754 above moderate-income units.

The City has allocated a higher proportion of affordable units in Lakeside Hills, exceeding the requirements of the Inclusionary Housing Ordinance, in anticipation that collaboration with non-profit affordable housing developers will yield additional affordable housing opportunities. The City has a proven track record of working with organizations such as Self-Help Enterprises, which has successfully resulted in construction of affordable housing units. Additionally, the City is currently working with Lennar to develop single-family homes in the southwest region, incorporating designs

to accommodate Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) on the parcels. This proactive coordination with developers and the promotion of ADU/JADU development are expected to further expand affordable housing availability in Patterson.

Anticipated Accessory Dwelling Unit Development

The City has noted increased community interest in ADU/JADU development and has proactively responded by offering five free pre-approved ADU building plans on its Accessory Dwelling Unit website.[5] These plans are designed to streamline the planning and approval process while reducing design costs for developers and property owners. Additionally, Program 4.12 outlines educational and marketing initiatives to further support ADU/JADU development, addressing common community requests (see Chapter 3). The program also commits the City to seeking funding opportunities to provide low-interest loans to encourage and facilitate ADU/JADU construction.

With strong community interest, the City's targeted initiatives, and developers such as Lennar actively advancing ADU projects in Patterson, significant growth in ADU development is anticipated during the 2023-2031 planning period. The City remains committed to fostering this development to provide a diverse range of housing options that address the needs of various households, and is in negotiations with developers to facilitate the development of ADUs with single-family homes.

The Site Inventory allocates 15 percent of the anticipated above moderate-income units (1,754 units), equating to 263 ADUs distributed across very low-, low-, moderate-, and above moderate-income categories. Using ABAG's 30-30-30-10 percent distribution methodology, this allocation includes 79 very low-income, 79 low-income, 79 moderate-income, and 26 above moderate-income ADUs within the Lakeside Hills development area.

Available Infrastructure

The City has initiated the planning process to expand the existing wastewater systems within the project area. In the interim, temporary sewer connections must be provided to support early-phase development, with the City enforcing fair share contributions from proposed development to fund the sewer upgrade that will be necessary to serve the entire Master Plan area. Temporary sewer connections are necessary to support development and the City's fulfillment of its RHNA.

Potable water service will be provided by existing pipelines along Rogers Road, Zacharias Road, and Ward Avenue/State Route 33, while wastewater services will be supported by tying into an existing sewer main along Keystone Pacific Parkway. The sewer utility lines are expected to provide short term service to support initiation of development and are not anticipated to present any constraints to progress as long as developers share the cost of the sewer impacts resulting from proposed development. Potable water can be delivered to the development through existing City wells and infrastructure; however, the groundwater demand underlying potable water service in the City will need to be offset by groundwater recharge through the Del Puerto Creek Recharge Project, a

[5] https://www.pattersonca.gov/2000/Accessory-Dwelling-Units-ADUs

version of which was always contemplated as part of the Master Plan. Developers will be required to contribute their fair share of financing for the recharge project. Additionally, all new development in the City will be required to purchase surface water to offset their potable water demand for recharge. Sufficient surface water supplies to offset potable water demand from the Master Plan are believed to be available from local irrigation districts. Program 5.7 outlines key actions for the City, including securing financing for a wastewater system expansion contract, working towards developer accountability to advance housing projects within the planning period, and facilitating temporary sewer connections during system expansion (see Chapter 3).

Development Phasing

The development of the Zacharias development area will be carried out in phases to allow for the timely completion of necessary infrastructure improvements, particularly for water and wastewater systems. This phased approach ensures developer funding of the water and sewer infrastructure. This is necessary to ensure public health and safety for all the citizens of Patterson, not just the occupants of new development based on the impact of the new development on Patterson. The exact timing and scope of each phase may shift based on factors such as developer commitment, funding, and the progress of infrastructure upgrades.

Initial development is expected to begin in the southeastern portion of the site, specifically in Keystone Ranch, and will progress westward and northward in a clockwise manner. A critical aspect of the phasing strategy is ensuring the timely development of lower-income housing units. The City's Site Inventory allocates 17 Keystone Ranch units to very low income, 24 to low, income, 64 to moderate income, with the remaining 612 units at above moderate income.

Lakeside Hills, which includes additional lower-income units, is part of the second phase. To facilitate the development of lower-income housing during the planning period, the City is actively collaborating with developers to accelerate this timeline, and to prioritize early development of affordable multi-family residential units. As outlined in Program 1.6, the City proposes to hire a 1.0 Full-Time Equivalent (FTE) to manage housing element implementation, which includes facilitating the development of lower-income units to meet the City's RHNA. This program proposes several actions to achieve this, including reducing planning permit entitlement fees for affordable housing projects with deed-restricted units by 50 percent and deferring payment of impact fees; expediting planning review and processing; and working with or assisting nonprofit developers to pursue affordable housing funds.

Realistic Capacity Analysis

The City has identified the Keystone Ranch and Lakeside Hills project areas within the Zacharias development area as key sites for development within the eight-year planning period. Together, these areas encompass approximately 431 acres and are projected to accommodate 356 very low-, 194 low-, 324 moderate-, and 2,366 above moderate-income units for a total of 3,240 residential

units. Application and enforcement of the City's Inclusionary Ordinance is paramount to production of these affordable units. Additionally, the Lakeside Hills development area is anticipated to develop 263 ADUs.

The capacity analysis for these two project areas is informed by the Master Plan's land use designations, which include Medium Density Residential (5.1 to 12.0 dwelling units per acre), High Density Residential (12.1 to 25.0 dwelling units per acre), and Mixed-Use, which adheres to the High Density Residential standards. The Master Plan establishes planned development capacities for both the Keystone Ranch and Lakeside Hills areas based on their assigned land use designations. This Site Inventory reflects the realistic capacity outlined in the Master Plan; however, as discussed below, higher-intensity development may be achievable under the existing land use designations and allowable densities.

Table 4-5 presents the realistic capacity assumptions for the Keystone Ranch and Lakeside Hills project areas. Figure 4-2 illustrates the land uses in the Zacharias development area.

The capacity analysis for the Keystone Ranch project area incorporates two development densities for medium-density residential zones: 6.0 dwelling units per acre and 7.4 units per acre. This approach allows for flexibility in the design of both production and custom housing. Sites developed at 6.0 units per acre achieve 50 percent capacity, while those at 7.4 units per acre reach 62 percent capacity. High-density residential areas will be developed at a rate of 17.1 dwelling units per acre, achieving 68 percent capacity.

The capacity analysis for the Lakeside Hills project area applies a single density of 6.5 dwelling units per acre for medium-density residential zones, resulting in an average development capacity of 54 percent. High-density residential areas will be developed at 18.0 units per acre, achieving 71 percent capacity. Mixed-use residential areas will be developed at 10.5 units per acre, with an average capacity of 41 percent.

Both areas apply conservative densities to account for market demand fluctuations and financing considerations. However, it should be noted that the Lakeside Hills development area permits a maximum density of 25.0 dwelling units per acre for both High-Density Residential and Mixed-Use designations but currently utilizes densities of only 18.0 and 10.5 dwelling units per acre, respectively. Similarly, the Keystone Ranch development area allows a maximum of 25.0 dwelling units per acre for High-Density Residential but utilizes just 17.1 dwelling units per acre. These lower densities may result in the underutilization of limited land resources within the City, particularly in areas like the Zacharias development area, which was recently annexed from agricultural/open space lands. Based on existing land use designations and densities, higher intensity development could be supported for both project areas.

Table 4-5 Zacharias Development Area Realistic Capacity

Site ID	Acreage	Existing Zoning	Permitted Density	Utilized Density	Percent Capacity	VLI Units	LI Units	MI Units	AM Units	Total Units
	Keystone Ranch									
1A	11.1	MR	5.1 – 12.0 du/ac	6.0	50%			10	57	67
	15.4	MR	5.1 – 12.0 du/ac	6.0	50%			12	80	92
	15.7	MR	5.1 – 12.0 du/ac	6.0	50%			10	84	94
	5.1	MR	5.1 – 12.0 du/ac	7.4	62%			10	28	38
	12.5	MR	5.1 – 12.0 du/ac	7.4	62%			10	83	93
	16.1	MR	5.1 – 12.0 du/ac	7.4	62%			12	107	119
	12.6	HR	12.1 – 25.0 du/ac	17.1	68%	17	26		173	216
	88.5				Subtotal	17	26	64	612	719
	Lakeside Hills									
1B	13.0	MR	5.1 – 12.0 du/ac	6.5	54%			10	74	84
	13.9	MR	5.1 – 12.0 du/ac	6.5	54%			10	80	90
	13.6	MR	5.1 – 12.0 du/ac	6.5	54%			10	78	88
	14.8	MR	5.1 – 12.0 du/ac	6.5	54%			10	86	96
	8.8	MR	5.1 – 12.0 du/ac	6.5	54%				57	57
	15.6	MR	5.1 – 12.0 du/ac	6.5	54%			10	91	101
	16.7	MR	5.1 – 12.0 du/ac	6.5	54%			10	98	108
	11.4	MR	5.1 – 12.0 du/ac	6.5	53%				73	73
	13.1	MR	5.1 – 12.0 du/ac	6.5	54%			10	75	85
	19.4	MR	5.1 – 12.0 du/ac	6.5	54%			15	110	125
	19.8	MR	5.1 – 12.0 du/ac	6.5	54%			15	113	128
	15.3	MR	5.1 – 12.0 du/ac	6.5	54%			10	89	99

Site ID	Acreage	Existing Zoning	Permitted Density	Utilized Density	Percent Capacity	VLI Units	LI Units	MI Units	AM Units	Total Units
	13.2	MR	5.1 – 12.0 du/ac	6.5	54%			10	75	85
	12.6	MR	5.1 – 12.0 du/ac	6.5	54%			10	71	81
	10.0	MR	5.1 – 12.0 du/ac	6.5	53%				64	64
	11.6	MR	5.1 – 12.0 du/ac	6.5	54%				75	75
	6.3	MR	5.1 – 12.0 du/ac	6.5	53%				40	40
	10.3	MR	5.1 – 12.0 du/ac	6.5	53%				66	66
	14.7	MR	5.1 – 12.0 du/ac	6.5	54%			10	85	95
	12.2	MR	5.1 – 12.0 du/ac	6.5	54%				79	79
	13.7	MR	5.1 – 12.0 du/ac	6.5	54%			10	78	88
	16.6	MR	5.1 – 12.0 du/ac	6.5	54%			10	97	107
	13.0	HR	12.1 – 25.0 du/ac	18.0	71%	150	62	20		232
	5.0	HR	12.1 – 25.0 du/ac	18.0	72%	70	20			90
	2.7	MU	12.1 – 25.0 du/ac	10.5	39%	15	11			26
	2.8	MU	12.1 – 25.0 du/ac	10.5	39%	17	10			27
	3.1	MU	12.1 – 25.0 du/ac	10.5	40%	21	10			31
	3.5	MU	12.1 – 25.0 du/ac	10.5	40%	10	10	15		35
	6.4	MU	12.1 – 25.0 du/ac	10.5	41%	21	12	33		66
	4.2	MU	12.1 – 25.0 du/ac	10.5	41%	10	21	12		43
	5.5	MU	12.1 – 25.0 du/ac	10.5	42%	25	12	20		57
Subtotal acreage	342.8				Subtotal	339	168	260	1,754	2,521
					Lakeside Hills 15% ADUs	79	79	79	26	263
Total acreage	431.3				Grand Total	435	273	403	2,392	3,503

SOURCE: City of Patterson, Zacharias and Baldwin Ranch Master Plan, August 2022

ZACHARIAS RANCH

PA	Land Use	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
1	Light Industrial	66.4	~	~	1,360,500
2	Light Industrial	36.7	~	~	845,500
3	Light Industrial	25.4	~	~	523,500
4	Light Industrial	31.0	~	~	720,500
5	Light Industrial	29.5	~	~	585,250
6	Light Industrial	62.6	~	~	1,420,500
7	Light Industrial	65.9	~	~	1,454,250
8	Medium Density Residential	47.9	5.4	259	~
9	General Commercial	22.2	~	~	350,000
10	Medium Density Residential	42.2	5.4	228	~
11	Medium Density Residential	39.4	5.4	213	~
P-1	Park	3.0	~	~	~
P-2	Park	3.0	~	~	~
P-3	Park	3.5	~	~	~
	ZACHARIAS RANCH - TOTAL	**478.7**	**~**	**700**	**7,260,000**

TPF DEVELOPMENT

PA	Land Use	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
12	Low Density Residential	9.0	5.1	47	~
13	Medium Density Residential	9.4	9.4	87	~
14	Medium Density Residential	9.3	9.4	87	~
15	Low Density Residential	9.6	5.1	50	~
16	Low Density Residential	10.1	5.1	53	~
17	Medium Density Residential	9.2	9.4	84	~
18	Medium Density Residential	9.2	9.4	84	~
19	Low Density Residential	9.5	5.1	49	~
20	Low Density Residential	9.1	5.1	47	~
21	Low Density Residential	7.9	5.1	41	~
22	Low Density Residential	7.9	5.1	41	~
23	Low Density Residential	9.6	5.1	50	~
P-4	Park	9.9	~	~	~
	TPF DEVELOPMENT - TOTAL	**119.7**	**~**	**720**	**~**

KEYSTONE RANCH

PA	Land Use	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
24	Medium Density Residential	11.1			
25	Medium Density Residential	15.4	6.0	253	~
26	Medium Density Residential	15.7			
27	Medium Density Residential	5.1			
28	Medium Density Residential	12.5	7.4	250	~
29	Medium Density Residential	16.1			
30	High Density Residential	12.6	17.1	216	~
P-5	Park	8.8	~	~	~
	KEYSTONE RANCH - TOTAL	**97.3**	**~**	**719**	**~**

LAKESIDE HILLS DEVELOPMENT

PA	Land Use	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
31	High Density Residential	13.0	18.0	232	~
32	Medium Density Residential	13.0	6.5	84	~
33	Medium Density Residential	13.9	6.5	90	~
34	Medium Density Residential	13.6	6.5	88	~
35	Medium Density Residential	14.8	6.5	96	~
36	Medium Density Residential	8.8	6.5	57	~
37	Medium Density Residential	15.6	6.5	101	~
38	Medium Density Residential	16.7	6.5	108	~
39	Medium Density Residential	11.4	6.5	73	~
40	Medium Density Residential	13.1	6.5	85	~
41	Medium Density Residential	19.4	6.5	125	~
42	Medium Density Residential	19.8	6.5	128	~
43	Medium Density Residential	15.3	6.5	99	~
44	Medium Density Residential	13.2	6.5	85	~
45	Medium Density Residential	12.6	6.5	81	~
46	Medium Density Residential	10.0	6.5	64	~
47	Medium Density Residential	11.6	6.5	75	~
48	Medium Density Residential	6.3	6.5	40	~
49	Medium Density Residential	10.3	6.5	66	~
50	Mixed Use	2.7	10.5	26	50,500
51	Mixed Use	2.8	10.5	27	48,500
52	Mixed Use	3.1	10.5	31	58,500
53	Mixed Use	3.5	10.5	35	61,500
54	Medium Density Residential	14.7	6.5	95	~
55	Mixed Use	6.4	10.5	66	113,500
56	Mixed Use	4.2	10.5	43	74,000
57	Mixed Use	5.5	10.5	57	98,500
58	High Density Residential	5.0	18.0	90	~
59	Medium Density Residential	12.2	6.5	79	~
60	Medium Density Residential	13.7	6.5	88	~
61	Medium Density Residential	16.6	6.5	107	~
P-6	Park	4.5	~	~	~
P-7	Park	4.5	~	~	~
P-8	Park	10.5	~	~	~
P-9	Park	4.0	~	~	~
P-10	Park	5.0	~	~	~
P-11	Park	3.0	~	~	~
OS-1	Open Space / Lake	5.4	~	~	~
OS-2	Open Space / Lake	8.0	~	~	~
	LAKESIDE HILLS DEVELOPMENT - TOTAL	**387.7**	**~**	**2,521**	**505,000**

IVY ROSE GARDENS

PA	Land Use	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
62	Low Density Residential	34.7	3.0	104	~
63	Low Density Residential	26.4	3.0	79	~
64	Low Density Residential	55.3	3.0	166	~
65	Low Density Residential	27.3	3.0	82	~
	IVY ROSE GARDENS - TOTAL	**143.7**	**3.0**	**431**	**~**

STORM RECHARGE & FEMA SOLUTION

PA	Land Use	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
OS-3	Flood Control / Park	39.4	~	~	~
OS-4	Recharge Basin	30.1	~	~	~
	STORMWATER RECHARGE & FEMA SOLUTION - TOTAL	**69.5**	**~**	**~**	**~**

PROJECT SUMMARY BY DEVELOPMENT

Color	Development	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
	Zacharias Ranch	478.7	~	700	7,260,000
	TPF Development	119.7	~	720	~
	Keystone Ranch	97.3	~	719	~
	Lakeside Hills Development	387.7	~	2,521	505,000
	Ivy Rose Gardens	143.7	3.0	431	~
	Stormwater Recharge & FEMA Solution	69.5	~	~	~
	PROJECT TOTAL	**1,296.6**	**~**	**5,091**	**7,765,000**

PROJECT SUMMARY BY LAND USE

Color	Land Use	Acreage (Gross)	Density	# of Units	Bldg. Sq. Ft.
	Light Industrial	317.5	~	~	6,910,000
	General Commercial	22.2	~	~	350,000
	Low Density Residential	216.4	3.7	809	~
	Medium Density Residential	539.1	6.4	3,459	~
	High Density Residential	30.6	17.6	538	~
	Mixed Use	28.2	10.4	285	505,000
	Park / Bike & Pedestrian Pathways	59.7	~	~	~
	Open Space / Lake / Flood Control / Park / Recharge Basin	82.9	~	~	~
	PROJECT TOTAL	**1,296.6**	**~**	**5,091**	**7,765,000**

1. Areas for B-1 through B-5 are INCLUDED in the Planning Area Acreages. Exact size to be determined with Development of each Planning Area
2. Future ±14 Acre Elementary School to be located East of Baldwin Road (acreage not included in calculations above)
3. Future ±15 Acre Middle School to be located West of Baldwin Road (acreage not included in calculations above)

Zacharias Master Planning Area

Conceptual Land Use Plan Breakdown

City of Patterson, Stanislaus County, California
August 1, 2022

Source: GDR Engineering 2022

Figure 4-2

Zacharias Master Plan Area Land Use Diagram

City of Patterson 6th Cycle Housing Element

E M C

The City has previously demonstrated success in collaborating with nonprofit affordable housing developers, such as Self-Help Enterprises, which developed the 138-unit affordable Stonegate Village Apartments in 2021. To facilitate this project, the City provided several development concessions, including an increase in density from a maximum of 12.0 to 20.0 dwelling units per acre, enabling the developer to qualify for the State Density Bonus. The City remains committed to leveraging such partnerships and providing necessary development concessions to facilitate affordable housing in the Master Plan Area. This approach reflects the City's proactive efforts to balance land use efficiency with the delivery of needed housing.

Potential Limitations to Development

The Zacharias development area faces development limitations. While the area is already annexed, vacant, and ready for construction, the primary challenge lies in developer accountability to contribute fair share funding to expand the potable water and wastewater infrastructure needed to accommodate projected growth. However, temporary connections to existing wastewater systems in the Keystone Ranch and Lakeside Hills areas are available to support the very initial phases of development. To secure potable water supplies for the project, developers will need to contribute their fair shares to finance the Del Puerto Creek Recharge Project and the project will need to be constructed. The City is open to working with developers who are accountable and invested in the long-term growth and development of affordable housing within the Master Plan Areas.

Baldwin Ranch South Development Area

The Baldwin Ranch South development area covers 66 acres at the southern end of Baldwin Road, bordered by the Delta-Mendota Canal to the west, the City of Patterson Corporation Yard to the north, and agricultural land to the east and south. Annexed in Spring 2024, the area is scheduled for development starting in Summer 2025, with 305 residential units planned in a single phase. The master-planned community will also include five acres of parkland, featuring a bike path to enhance recreational opportunities for residents. The tentative maps for the master plan area have not yet been recorded.

Residential Potential

The Baldwin Ranch South development area is designed to accommodate 305 residential units across 60.9 acres. All 305 units are allocated to medium-density developments such as single-family homes, townhouses, and duplexes. Medium Density Residential uses permit residential densities ranging from 5.1 to 12.0 dwelling units per acre.

The site inventory allocates the 305 residential units to accommodate 91 moderate- and 214 above moderate-income units. Table 4-6 outlines the residential opportunities in the Baldwin Ranch South development area.

Table 4-6 Baldwin Ranch South Development Area Residential Land Uses

Zoning	Land Use	Density (du/ac)	Acres	Units	Percent Total Units
MR	Medium Density Residential	5.1 – 12.0	60.9	305	100%
Total			60.9	305	100%

SOURCE: City of Patterson, Zacharias and Baldwin Ranch Master Plan, August 2022

Anticipated Accessory Dwelling Unit Development

Similar to the Zacharias development area, the City anticipates development of ADUs in the Baldwin Ranch South development area in response to increased community and developer interest in ADU construction. Lennar and DR Horton are among the developers building residential units in Baldwin Ranch North, including parcels designed to accommodate ADUs. The City anticipates this trend will extend seamlessly into Baldwin Ranch South and is actively engaging with these developers to encourage and facilitate ADU development.

Active developers in the Baldwin Ranch South development area offer floorplans with JADU options at the time of purchase—such as layouts featuring a first-floor bedroom with a private bathroom and kitchenette—and many buyers are choosing to include this integrated option. For those who opt not to add a JADU during the initial purchase, the floorplans are designed to allow for easy retrofitting. In most cases, only minor modifications—such as adding a door to separate the entryway from the main living space and installing a small kitchenette or wet bar—are needed. This type of development supports aging in place and multigenerational living, offering flexible housing solutions for extended families and individuals with evolving needs. These creative, forward-thinking strategies provide a cost-effective way to expand affordable housing options through new construction, without placing the burden of building separate units on homeowners. By leveraging thoughtful design integration, the City is advancing its commitment to attainable housing that aligns with both state housing goals and local community needs. The Site Inventory allocates 15 percent of the anticipated above moderate-income units (214 units), equating to 32 ADUs distributed across very low-, low-, moderate-, and above moderate-income categories. Using ABAG's 30-30-30-10 percent distribution methodology, this allocation includes 10 very low-income, 10 low-income, 10 moderate-income, and two above moderate-income ADUs within the Baldwin Ranch South development area.

Available Infrastructure

Lennar and LGI are currently developing residential communities north of the Baldwin Ranch South development area, with infrastructure expected to be completed by December 2025. The Baldwin Ranch South development area will be designed to build upon and expand the infrastructure from the adjacent northern developments. It is likely that Lennar and LGI will continue expanding residential development into the Baldwin Ranch South development area, supporting the seamless extension of infrastructure. This development area is also subject to the provisions of the Groundwater Sustainability Plan (GSP). Developers will be required to contribute their fair share of financing for improvement projects to meet the state-imposed timeline to mitigate water shortages.

Development Phasing

Due to the small number of residential units to be developed and fewer necessary infrastructure improvements, development of the Baldwin Ranch South development area will be carried out in a single phase. As previously mentioned, Lennar and LGI are actively developing communities just north of the recently annexed Baldwin Ranch South development area, making it likely they will continue expanding in this region. Their established presence, ongoing projects, and investment in the area suggest they are well-positioned to pursue further development. Additionally, the proximity of these communities to Baldwin Ranch South offers strategic advantages, such as shared infrastructure and streamlined approvals, further encouraging continued growth by these developers.

Realistic Capacity Analysis

The capacity analysis for the Baldwin Ranch South development area is informed by the Master Plan's residential land use designations, which for Baldwin Ranch South includes Medium Density Residential (5.1 to 12.0 dwelling units per acre). Unit allocations for the Medium Density Residential land use category are based on the available acreage and the permissible development density. Table 4-7 presents the realistic capacity assumptions for the Baldwin Ranch South development area.

The capacity analysis for the Baldwin Ranch South development area applies a single density of 5.1 dwelling units per acre for medium-density residential zones, resulting in an average development capacity of 42 percent resulting in a total 305 residential units

Table 4-7 Baldwin Ranch South Development Area Realistic Capacity

Site ID	Acreage	Existing Zoning	Permitted Density	Utilized Density	Percent Capacity	VLI Units	LI Units	MI Units	AM Units	Total Units
Baldwin Ranch South										
2	60.9	MR	5.1 – 12.0 du/ac	5.1	42%			91	214	305
Total	60.9				Subtotal	0	0	91	214	305
					15% ADUs	10	10	10	2	32
					Grand Total	10	10	101	216	337

SOURCE: City of Patterson, Zacharias and Baldwin Ranch Master Plan, August 2022

Vacant and Underutilized Sites

The City has identified 12 vacant and underutilized sites capable of supporting 1,374 residential units. Of these, 703 units are designated for very low-income households, 588 for low-income households, and 83 for moderate-income households. Table 4-8 provides detailed information on these sites, excluding master-planned areas and pipeline projects.

Site Suitability

Pursuant to Government Code Section 65583.2(c)(2)(A), (B), and (C), all sites identified in the inventory to accommodate lower-income housing are adequately sized, with each site being at least half an acre and no larger than 10 acres.

Land use controls and site improvement requirements have been analyzed for constraints within Chapter 2, Constraints Assessment, and necessary changes to the review process are included as Programs within Chapter 3, Goals, Policies and Programs. The realistic development capacity for the site inventory begins with assuming those process changes to be in place by or prior to December 2025.

In accordance with Government Code Section 65583.2(c)(3), all sites planned to accommodate lower-income units are zoned to support appropriate densities of 20 dwelling units per acre, or they are undergoing rezoning to permit higher densities to better facilitate housing development.

Program 1.10 proposes an amendment to the Zoning Code to revise development standards in the High Density Residential and Downtown Core Zoning Districts, including increasing residential densities. These increases are detailed in Table 3-2 of the program (see Chapter 3). These changes to density do not apply to the Zacharias and Baldwin Ranch Master Plan areas.

All sites planned to accommodate lower-income units are zoned one of the following:

- High Density Residential: permits 20.1 to 35.0 dwelling units per acre;
- Mixed-Use: permits 20.1 to 35.0 dwelling units per acre; or
- Downtown Core: permits 20.0 to 35.0 dwelling units per acre.

Sites Requiring Rezoning

The City of Patterson has an unaccommodated housing need of 196 lower-income units from the 5th Cycle Housing Element. In accordance with Government Code Section 65584.09, this deficit must be addressed in addition to the 6th Cycle RHNA allocation of 3,716 units, resulting in a total housing need of 3,912 units. To accommodate this requirement and to meet the lower-income RHNA, the City will rezone land to facilitate high-density residential development. Table 4-9 identifies the specific sites that require rezoning, with the City committed to completing the necessary zoning amendments by December 2025. Program 1.11 in Chapter 3 of this Housing Element proposes these zoning amendments.

Table 4-8 Vacant and Underutilized Sites

Site ID	APN	Existing General Plan	Existing Zoning	Proposed General Plan	Proposed Zoning	Area	Max Density	Yield % of Max Density	VLI Units	LI Units	MI Units	AM Units	Total	Vacant	By-Right with 20% affordable
High Density Residential															
3	021-040-055	High Density Residential	HR	--	--	0.80	20.0*	100%	16				16	Yes	No
4	047-024-024	High Density Residential	HR	--	--	2.8	35.0	81%	43	36			79	Yes	No
5	047-034-035	High Density Residential	HR	--	--	2.13	35.0	81%	60				60	Yes	Yes
Sites requiring rezone															
6	048-042-001	General Commercial	GC	HDR	HR	5.5	35.0	81%	79	77			156	Existing business	No
7	048-042-008	General Commercial	GC	HDR	HR	3.97	35.0	81%	58	55			113	Yes	No
8	048-043-002	Low Density Residential	LR	HDR	HR	2.08	35.0	81%	29	30			59	Existing storage yard	No
9	048-043-015	General Commercial	GC	HDR	HR	2.55	35.0	81%	36	36			72	Existing special event center	No
10	048-048-007	General Commercial	GC	HDR	HR	10.00	35.0	81%	155	128			283	Yes	Yes
					Subtotal	29.83	--	--	476	362	0	0	838		
Downtown Core															
11	047-031-062	Downtown Commercial	DC	--	--	9.01	35.0	81%	128	128			256	Yes	No
					Subtotal	9.01	--	--	128	128	0	0	256		
Mixed-Use															
Sites requiring rezone															
12	021-028-007	Highway Service Commercial	HSC	Mixed-Use	MU	3.41	35.0	57%	24	24	20		68	Yes	No
13	021-028-008	Highway Service Commercial	HSC	Mixed-Use	MU	2.06	35.0	57%	15	14	12		41	Yes	No
14	021-098-003	General Commercial	GC	Mixed-Use	MU	8.53	35.0	57%	60	60	51		171	Yes	No
					Subtotal	14.0	--	--	99	98	83	0	280		
					Total	52.84	--	--	703	588	83	0	1,374		

SOURCE: City of Patterson, 2024

NOTES: Sites 6-10 and 12-14 require rezoning to accommodate higher residential densities.

Table 4-9 Sites Requiring Zoning Amendment

Site ID	Land Use Change	Zoning Change	APN	Acreage	Realistic Capacity: Lower-Income Units
6	General Commercial to High Density	GC to HR	048-042-001	5.5	156
7	General Commercial to High Density	GC to HR	048-042-008	3.97	113
8	Low Density to High Density	LR to HR	048-043-002	2.08	59
9	General Commercial to High Density	GC to HR	048-043-015	2.55	72
10	General Commercial to High Density	GC to HR	048-048-007	10.21	290
12	Highway Service Commercial to Mixed-Use	HSC to MU	021-028-007	3.41	48
13	Highway Service Commercial to Mixed-Use	HSC to MU	021-028-008	2.06	29
14	General Commercial to Mixed-Use	GC to MU	021-098-003	8.53	120
				Total Units	887

SOURCE: City of Patterson, 2024
NOTE: HR and MU Zoning Districts allow 20.1 – 35.0 dwelling units per acre, as implemented through Program 1.10 in Chapter 3.

Previously Identified Sites

Notably, Sites 5 and 10 were previously identified in the 5th Cycle Housing Element. These sites are subject to the provisions of Government Code Section 65583.2(c), which requires that undeveloped sites from a previous housing element be rezoned to accommodate lower-income housing needs, specifically allowing a density of 20 dwelling units per acre, and allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households. Program 1.12 establishes by-right approval of these sites when developers include 20 percent affordable units (see Chapter 3).

Non-Vacant Sites

Government Code Section 65583.2(g)(2) states that housing elements relying on non-vacant sites for greater than 50 percent of its lower-income households need to demonstrate that the existing use does not constitute an impediment to additional residential development. Over 70 percent of the sites included in the site inventory (excluding pipeline projects) are vacant. Sites 6, 8, and 9, currently have existing commercial uses, with none of the identified sites containing residential uses. The following sections discuss several factors considered for inclusion of these non-vacant sites in the Site Inventory.

Improvement-to-Land Value Ratio

All non-vacant sites identified in the Sites Inventory exhibit characteristics that strongly suggest a high likelihood of redevelopment. One such indicator is a parcel's improvement-to-land value ratio, which compares the assessed value of on-site structures to the value of the land. A ratio of less than 1.0 suggests that the market values the land more than the existing improvements, signaling that the site may be underutilized. These parcels present opportunities for property owners and developers to invest in higher-value improvements that better align with the site's potential.

It is important to note that while the improvement-to-land value ratio can be a useful screening tool, it does not account for development standards or environmental constraints that may affect the feasibility of redevelopment.

Table 4-10 summarizes redevelopment trends for non-vacant sites across Stanislaus County. As shown, the average improvement-to-land value ratio for these parcels is 0.92, indicating that many properties may be positioned for higher-intensity residential development.

Table 4-10 Redevelopment Trends of Non-Vacant Sites throughout Stanislaus County

Jurisdiction	Previous Use	Zoning	Site Acreage	Total Units	Improvement-to-Land Value Ratio	Year Built	FAR
Keyes	Two single family dwellings with extra land	R-1	13.20	62	0.74	1978	0.03
Keyes	Single family dwelling with extra land	R-1	9.54	28	0.07	--	--
Denair	Single family dwelling with extra land	P-D	1.32	10	0.54	1930	0.05
Keyes	Single family dwelling with extra land	R-1	2.11	8	1.51	1988	0.02
Denair	Single family dwelling with extra land	Rezoned to P-D	4.82	17	1.18	1950	0.01
Keyes	Single family dwelling with extra land	R-1	6.70	26	0.29	1992	0.02
Denair	Single family dwelling with extra land	R-A	18.20	69	0.93	1908/1979	0.01
Modesto	Commercial building, medical office	UGD	0.20	14	1.0	1982	0.82
Modesto	Warehouse	TD	0.93	79	2.1	1957	0.16
				Average	0.92	1960	0.14

SOURCE: Stanislaus County 6th Cycle Housing Element January 2025

Table 4-11 presents improvement-to-land value ratio, the year existing structures were built, and the existing FAR. Notably, Sites 6, 8, and 9 in the Patterson Sites Inventory have an average improvement-to-land value ratio of 0.55, suggesting that the land value significantly exceeds the value of existing improvements. This indicates these sites are underutilized and strong candidates for redevelopment. Based on patterns observed in recent residential redevelopment projects across the county—most of which involved sites with similarly low improvement-to-land value ratios—it is reasonable to conclude that redevelopment of Sites 6, 8, and 9 is likely, and that the market would support more intensive residential use on these parcels.

Age of Structure

The age of existing structures is a valuable indicator of a parcel's redevelopment potential. Parcels with recently constructed buildings are less likely to undergo further improvements or redevelopment in the near term, as the investment in new construction suggests the property is already being utilized to its intended capacity. Development trends across the county show that successful redevelopment of non-vacant parcels has typically occurred on sites with structures more than 50 years old (see Table 4-11).

Of the non-vacant sites identified in the Patterson Sites Inventory, structure age data was available only for Site 6, which contains a building that is 51 years old. This further supports the site's redevelopment potential, as older structures are more commonly associated with successful redevelopment efforts observed throughout the county.

Floor Area Ratio

Floor Area Ratio (FAR) values that fall below the maximum allowed by the zoning ordinance often indicate underutilized parcels, particularly in downtown or mixed-use areas where infill development is highly encouraged. In contrast, sites that are already developed with higher FARs are generally less likely to redevelop, as the cost of land and demolition may outweigh potential returns. Development trends across the county show that successfully redeveloped non-vacant parcels had an average FAR of 0.14, although in some cases, such as one notable project, the FAR reached as high as 0.82.

Of the non-vacant sites identified in the Patterson Sites Inventory, the average FAR is 0.2, indicating significant underutilization of these parcels. This further justifies their inclusion in the Site Inventory, despite their current non-vacant uses, as they present opportunities for redevelopment and more intensive land use.

Adequate Size and Density

Each of the non-vacant sites identified in the Patterson Sites Inventory is of sufficient size to accommodate high-density residential development, making them suitable for the inclusion of affordable housing. These sites are anticipated to undergo the necessary land use and zoning amendments to re-designate them as High-Density Residential, allowing for 20.1 to 35 dwelling units per acre.

Table 4-11 Non-Vacant Sites Identified for Residential Use

Site Number	Existing Use	Existing Zoning	Site Acreage	Anticipated Units After Rezone	Improvement-to-Land Value Ratio	Year Built	FAR	Aerial Image
6	Trucking company with extra land	GC	5.5	156	0.95	1974	0.03	
8	Trucking company	LR	2.08	59	0.64	--	0.01	
9	Special event center	GC	2.55	72	0.06	--	0.03	
				Average	0.55		0.02	

SOURCE: Parcel Quest Lite, 2025
NOTE: All properties were last assessed in 2024.

Program 1.11 outlines a clear schedule of actions and monitoring measures to implement these amendments, including increasing allowable densities within the High-Density Residential Zoning District. In addition, the program includes provisions requiring by-right approval for qualifying projects in which at least 20 percent of units are affordable, thereby streamlining the entitlement process and facilitating the production of affordable housing.

Existing Uses

Existing uses on Sites 6, 8, and 9 would likely need to be demolished to accommodate housing development. Details of existing uses on each site are provided below.

Site 6, located at 154 Poppy Avenue, is currently occupied by Cartel Transportation, a trucking company. The parcel totals 5.5 acres and is largely underutilized. A single building is located in the center of the parcel; approximately 1.43 acres remain undeveloped to the east/northeast; and 2.31 acres are unpaved and used for truck parking to the west/southwest. Due to the underutilization of the site, the land value significantly exceeds the market demand for its current use.

Site 8 is currently used as a truck storage/scrap yard. Located at 440 Sperry Avenue, the site totals 2.08 acres. The site's current uses as truck storage and a scrap yard provide limited economic value and face low market demand, particularly when compared to the higher and more sustainable economic potential associated with residential redevelopment.

Site 9, located at 125 Poppy Avenue, currently operates as a special event center; however, it has not hosted an event in ten years, rendering the existing use economically obsolete. The 2.55-acre site is, underutilized and would experience significantly higher market demand if redeveloped for residential use.

To facilitate the necessary zoning changes and promote residential development, the City is actively engaging with property owners to discuss redevelopment opportunities. The City is committed to working diligently and collaboratively to ensure these sites are successfully redeveloped for residential use in alignment with its housing goals. Program 1.11 sets forth a schedule of actions and monitoring to amend land use designations and rezone Sites 6-10 and 12-14 (see Chapter 3). If the necessary land use and zoning amendments for these sites are not completed by December 2025, the City will identify suitable and appropriately sized alternative site(s) to meet the RHNA.

As evidenced above, each of the non-vacant sites included in the Site Inventory presents a high likelihood of redevelopment based on factors such as improvement-to-land value ratio, age of existing structures, and floor area ratio (FAR). Additionally, all non-vacant sites are of adequate size and are proposed for land use and zoning amendments to allow for increased residential density. The market demand for current uses—such as truck yards and a special event center—is not considered an impediment to redevelopment, given the nature of these uses and the City's planning objectives.

Further, the City has notified these property owners of the inclusion of their properties in the Housing Element Site Inventory and the need to rezone the parcels to High-Density Residential to accommodate residential use. To date, none of the property owners have opposed the rezoning. The City continues to engage with these property owners to ensure they are fully informed about the potential for redevelopment and its role in helping the City meet its RHNA obligations. As such, the City does not foresee these existing uses precluding or constraining development. In the event that sites 6, 8, and 9 do not develop as anticipated in the Site Inventory, the City is committed to identifying alternative sites that are suitable for lower-income development.

History of Converting Existing Uses

Although the City has no recent history of formal land use conversions from non-vacant/non-residential to residential uses, it has actively pursued strategies to facilitate such transitions. In particular, the City has made zoning concessions to allow multi-family residential development within industrial districts on non-vacant sites. These efforts have been supported by property owners, several of whom have engaged in discussions with City staff regarding the redevelopment of non-vacant, non-residential parcels for housing. To streamline the process, the City has explored allowing certain residential redevelopment projects to proceed through the building permit process without requiring discretionary planning entitlements.

One such example is a project at 720 N 2nd Street, where an abandoned non-residential building is currently being converted into a three-unit residential development and is currently in the building permit review stage. These proactive efforts demonstrate the City's commitment to supporting infill residential development, even in areas not historically designated for housing.

The City recognizes the need to adapt governmental processes to facilitate residential development, often through creative and unconventional methods. Its willingness to collaborate with both property owners pursuing small-scale redevelopment and developers undertaking larger projects reflects the City's broader commitment to expanding housing opportunities, meeting its RHNA targets, and transforming Patterson's housing landscape in a meaningful way.

Non-Residential Zoned Sites

The site inventory identifies four vacant sites (Sites 11-14) zoned for mixed-use development, including residential uses. Recent development interest in the downtown area has prompted the City to propose increasing allowable densities from 12.1–20.0 to 20.0–35.0 dwelling units per acre and raising the maximum building height from 45 feet (three stories) to 50 feet (four stories). These measures, outlined in Program 1.10 of Chapter 3 in this Housing Element, aim to incentivize development.

Site 11 is a vacant parcel encompassing approximately nine acres within the Downtown Core (DC) Zoning District, which permits a variety of uses, including restaurants, retail, offices, hotels, multi-family residential units, and public and quasi-public services. Site 11 is projected to accommodate 256 lower-income housing units. Recent discussions with the City have revealed that the property

owner is interested in developing the site with apartments. The City is working closely with the property owner to provide incentives aimed at facilitating the development of 256 affordable housing units to meet the needs of lower-income households. Incentives include actions such as expedited planning review and processing, reducing planning permit fees by 50 percent with inclusion of deed-restricted affordable units, and deferred payment of impact fees. These ongoing discussions demonstrate a strong commitment to transforming the site into a viable residential development.

Sites 12 and 13, two adjacent vacant parcels totaling 5.47 acres, are currently zoned General Commercial (GC) and slated for rezoning to Mixed-Use (MU). The single property owner has expressed interest in developing a mixed-use project that includes residential apartments, and the City is in negotiations to support the development of 77 lower-income and 32 moderate-income units across both parcels.

Similarly, Site 14, a vacant parcel zoned General Commercial (GC) and also planned for rezoning to Mixed-Use (MU), has been approved for a commercial center with a residential component. The property owner has specifically expressed interest in residential development, and the City is actively negotiating to incentivize the inclusion of 120 lower-income, deed-restricted units, as well as 51 moderate-income units.

The City has successfully negotiated with property owners and developers to secure residential development. In 2021, the City partnered with Self-Help Enterprises to develop a 138-unit deed-restricted affordable rental building (Stonegate Village Apartments). The City provided concessions, such as increased densities and reduced parking requirements, enabling Self-Help Enterprises to qualify for State Density Bonus and Affordable Housing and Sustainable Community funding, which were crucial for the project's financial viability. This demonstrates the City's commitment to housing development and its willingness to offer development concessions to ensure project success and address housing needs.

Local Development Trends

Recent residential development in the City of Patterson has been predominantly single-family residential; however, multi-family and ADU production has seen an uptick in development.

In the eastern region, Self-Help Enterprises completed Stonegate Village in 2021, delivering 138 affordable rental units consisting of one- to three-bedroom apartments. Nearby, KB Home began construction of Sycamore Ranch and Acacia at Patterson Ranch in 2022, with both communities currently under construction. These ownership-based subdivisions offer three- to six-bedroom single-family homes targeted toward moderate-income households and are anticipated for full buildout by 2025.

In the western region, which includes newly annexed master-planned areas and former industrial lands, private developers are leading large-scale residential projects. Lennar began developing the Holly Oak and Magnolia communities in 2023, while DR Horton launched construction of the Meadows community in the same year—each located within the Baldwin Ranch North Master Plan Area and offering three- to four-bedroom single-family homes currently available for purchase. Landsea Homes commenced development of the Blossom community in 2023, delivering larger single-family homes with flexible floorplans to accommodate a range of household needs. While most of these western projects are market-rate ownership opportunities, select units—such as those with ADU options—support multi-generational living and may provide more affordable pathways to homeownership. Full buildout of these western communities is anticipated by 2026.

The programs outlined under Goal 1: Facilitate Housing Construction in Chapter 3 of this Housing Element are designed to support the production of affordable housing and include a range of actions the City is committed to implementing in order to encourage the development of affordable and diverse housing options.

Realistic Capacity Assumptions

Like many cities in Stanislaus County and the Central Valley region, the City of Patterson experienced limited multi-family development during the 5th cycle planning period. The most recent multi-family project is the previously mentioned, 138-unit deed-restricted affordable rental apartment building completed in 2021. To support density assumptions for its Site Inventory, the City reviewed multi-family projects developed across Stanislaus County over the past 10 years. As shown in Table 4-12, cities such as Turlock and Modesto have experienced multi-family residential development across various scales and zoning districts. On average, multi-family developments throughout the county achieved densities of 24 dwelling units per acre and utilized 81 percent of the maximum allowed density.

The site characteristics of these projects—including zoning and the percentage of allowable density achieved—align with the assumptions used for Patterson's site inventory.

High Density Residential and Downtown Core Realistic Capacity Assumptions

Table 4-8 above identifies vacant and underutilized housing opportunity sites in Patterson. The City's Site Inventory assumes an 81 percent development capacity for projects zoned High Density Residential (HR) and Downtown Core (DC) to allow flexibility in project design, potential land use controls, site improvements, and to reflect typical densities for the region.

Table 4-12 Typical Densities of Multi-Family Projects in Stanislaus County

Project	Jurisdiction	Zoning	Max Density	Site Acreage	Total Units	Achieved Density (du/ac)	Percent Yield
Avena Bella, Phase 2	Turlock	Planned Development	30.0	2.20	61	27.7	92%
Archway Commons Phase 1	Modesto	Planned Development	29.0	4.50	76	16.9	58%
Archway Commons Phase 2	Modesto	Planned Development	29.0	3.17	74	23.3	80%
3600 Dale	Modesto	Planned Development	29.0	1.7	44	25.6	88%
112 James Street	Modesto	R-3	29.0	0.3	7	25.6	88%
					Average	23.8	81%

SOURCE: Stanislaus County Draft 6th Cycle Housing Element

To calculate realistic residential capacity for sites currently zoned and proposed to be rezoned to High Density Residential or Downtown Core, the City applied adjustment factors to account for land use controls and site improvements, realistic capacity of the site, and typical densities in the region. The adjusted capacity for sites 3 through 11 is calculated as follows:

- Site 3: (0.80 acres × 20 du/ac × 0.85 × 0.85 × 0.80) = 16 units, 100 percent realistic yield;
- Site 4: (2.80 acres × 35 du/ac × 0.95 × 0.95 × 0.90) =80 units, 81 percent realistic yield;
- Site 5: (2.13 acres × 35 du/ac × 0.95 × 0.95 × 0.90) = 61 units, 81 percent realistic yield;
- Site 6: (5.50 acres × 35 du/ac × 0.95 × 0.95 × 0.90) = 156 units, 81 percent realistic yield;
- Site 7: (3.97 acres × 35 du/ac × 0.95 × 0.95 × 0.90) = 113 units, 81 percent realistic yield;
- Site 8: (2.08 acres × 35 du/ac × 0.95 × 0.95 × 0.90) = 59 units, 81 percent realistic yield;
- Site 9: (2.55 acres × 35 du/ac × 0.95 × 0.95 × 0.90) = 72 units, 81 percent realistic yield;
- Site 10: (10 acres × 35 du/ac × 0.95 × 0.95 × 0.90) = 284 units, 81 percent realistic yield;
- Site 11: (9.01 acres × 35 du/ac × 0.95 × 0.95 × 0.90) = 256 units, 81 percent realistic yield.

Site 3 is the exception, projected to develop at full capacity due to its ownership. The Stanislaus Regional Housing Authority owns the property and plans to develop Phase 2 of the Las Palmas Senior Housing Complex. Zoned for High Density Residential, the site will be built to the existing permitted maximum density of 20 dwelling units per acre, accommodating 16 very low-income, deed-restricted units. The project utilizes the existing densities, as it is too advanced in the planning process to accommodate any changes to the proposed density. However, if the project does not

proceed as planned and the Housing Authority is interested in applying the proposed increased density for the High Density Residential Zoning District to accommodate additional units, that option would be available.

Site 11, which is currently zoned Downtown Core, is not proposed for rezoning. Although the zoning allows for non-residential uses, the City remains optimistic that residential development will occur due to the site's strategic location near public amenities, transit options, and essential services. City staff are actively engaged in discussions with the property owner to facilitate the development of residential units on this prime infill site.

Mixed-Use Realistic Capacity Assumptions

For projects planned to be rezoned to Mixed-Use (MU), a 57 percent development capacity is assumed, utilizing the minimum density of 20.1 dwelling units per acre, accounting for the inclusion of ground-floor commercial development alongside residential uses.

To calculate realistic residential capacity for sites proposed to be rezoned to allow mixed-use development, the City applied adjustment factors to account for land use controls and site improvements, realistic capacity of the site, and typical densities in the region. The adjusted capacity for sites 12 through 14 is calculated as follows:

- Site 12: (3.41 acres × 35 du/ac × 0.80 × 0.85 × 0.85) = 68 units, 57 percent realistic yield;
- Site 13: (2.06 acres × 35 du/ac × 0.80 × 0.85 × 0.85) = 41 units, 57 percent realistic yield; and
- Site 14: (8.53 acres × 35 du/ac × 0.80 × 0.85 × 0.85) = 171 units, 57 percent realistic yield.

Higher adjustment factors were applied to reflect the potential for ground-floor commercial uses being incorporated alongside residential development. This conservative approach serves as a safeguard against overestimating development potential, ensuring the City does not rely on unrealistic capacity projections that could result in a net loss of available housing sites if full development is not realized. This strategy helps maintain a balanced and reliable inventory for future growth. Residential development may be constructed at higher densities.

The City has included these three non-residential sites in the Site Inventory based on property owner interest in redeveloping for mixed commercial and residential uses during the 2023-2031 planning period. The City is actively negotiating with the owners to promote optimal land use and incentivize affordable multi-family development.

To ensure no net loss is achieved, the City will annually monitor built densities and make adjustments if development densities are not achieved as outlined in the Site Inventory. Program 1.1 establishes these actions for monitoring purposes, and sets alternative actions to be pursued, if multi-family projects are not achieving at least the densities set forth in the Site Inventory (see Chapter 3).

4.4 Availability of Infrastructure and Services

Potable Water System

The City of Patterson relies on groundwater from the Delta-Mendota Subbasin as its sole source of potable water. Despite the subbasin being designated as critically over drafted, the City has taken proactive steps to ensure long-term water sustainability. As an active stakeholder in the Delta-Mendota Groundwater Sustainability Agency (GSA), Patterson is participating in the Groundwater Sustainability Plan (GSP), which aims to achieve groundwater sustainability by 2040. Key projects, such as the Percolation Ponds for Stormwater Capture and Recharge, demonstrate the City's commitment to maintaining adequate water resources. As noted in the Constraints Assessment, the City is subject to a new GSP that was adopted in November 2024. Accordingly, the City has taken the actions outlined in Program 1.15 to address the constraint on development.

Wastewater System

The City of Patterson's Water Quality Control Facility collects and treats all wastewater for the city and the nearby community of Diablo Grande, with a daily treatment capacity of 2.25 million gallons and current usage of 1.8 million gallons per day. The City's Urban Water Management Plan and Capital Improvement Program Master Plan ensure sufficient wastewater capacity through 2045, with no current capacity issues due to successful conservation efforts. Therefore, the City's wastewater infrastructure will not pose a constraint to meeting RHNA obligations during the 6th Cycle planning period.

Storm Water and Drainage

Housing projects on identified sites must comply with Chapter 13.32, Urban Storm Water Quality Management and Discharge Control, of the Patterson Municipal Code, which mandates eliminating illegal discharges, protecting watercourses, and following best management practices for construction to minimize impacts on stormwater facilities. Implementation of these policies ensure the City can meet its RHNA requirements.

Circulation System

The City of Patterson is committed to enhancing accessibility and infrastructure through comprehensive planning and strategic investments in transportation and pedestrian safety. The City's General Plan, particularly the Transportation Circulation Element, outlines long-term plans for roadways, transit systems, goods movement, and nonmotorized travel like bicycle and pedestrian infrastructure to meet future population growth.

In 2022, Patterson adopted the Active Transportation Plan, which aims to create a safe and accessible network of bike and pedestrian facilities, connecting existing trails and improving access to schools and community destinations. This plan emphasizes promoting walking and biking, enhancing pedestrian safety, improving air quality, and overall quality of life in the city.

Following the approval of Measure L by Stanislaus County voters in 2016, the City has used sales tax revenue to fund key projects, including citywide sidewalk replacements, Sperry Avenue improvements, and the Pedestrian Safety Improvement Project along Las Palmas and Ward Avenue. Ongoing projects include the Local Roadway Safety Plan, funded by the Department of Transportation to improve mobility and safety, and the Urban Bicycle Trail Project, which will connect the city's northern and southern areas with a new trail along American Eagle Avenue. These initiatives demonstrate the City's dedication to ensuring safe, accessible, and efficient infrastructure for its growing community.

Dry Utilities

Turlock Irrigation District (TID) supplies electricity to the city, while Pacific Gas and Electric (PG&E) provides natural gas. Telephone, internet, and cable TV services are offered by providers such as Frontier Communications and Comcast Xfinity.

Infrastructure Improvements Required to Support RHNA

The following discussion outlines infrastructure requirements for the Sites Inventory, identifying where expansion or extension of utilities and services is necessary to support residential development.

Future growth in the Zacharias and Baldwin Ranch Master Plan areas will require expansion of existing wastewater and water systems. To confront this development constraint, contribution from developers and long-term planning is essential to support anticipated growth.

Currently, wastewater services are available through temporary utility connections along Keystone Pacific Parkway, while potable water services are accessible via existing pipelines along Rogers Road, Zacharias Road, and Ward Avenue/State Route 33. These connections will support the initial phases of development in the Zacharias and Baldwin Ranch Master Plan areas.

To support the expansion of water and wastewater infrastructure in the Zacharias and Baldwin Ranch Master Plan areas to accommodate long-term growth, the City will partner with developers, as well as pursue state and federal grants, such as Proposition 1, Integrated Regional Water Management Grant, CDBG Fund, Clean Water State Revolving Fund, and Drinking Water State Revolving Fund. Developers are required to finance the necessary infrastructure to support residential development. Next steps include securing funding commitments, finalizing infrastructure design plans, and coordinating with utility providers to ensure phased implementation aligns with development timelines. Program 5.7 proposes several actions for the City in order to ensure completion of infrastructure improvements during the planning period.

The Baldwin Ranch South portion of this Master Plan is designed to build upon and expand existing infrastructure from adjacent developments to the north. Lennar and LGI, currently developing residential communities in the Baldwin Ranch North area, are expected to continue their expansion into the Baldwin Ranch South area, ensuring a seamless extension of infrastructure.

All other sites in the inventory have adequate existing infrastructure and do not require the construction of new or expanded facilities.

Capital Improvement Program Investment

To support existing and future growth, the City updates its Capital Improvement Program (CIP) annually. Appendix A, Assessment of Fair Housing, analyzes access to resources throughout the city, detailing the City includes both high and moderate resource areas according to TCAC data. The CIP includes infrastructure projects targeting moderate resource areas, where needs are more pressing. These projects focus on pedestrian improvements, ADA compliance, enhanced connectivity between the western and eastern areas, and upgrades to potable water, sewer, and stormwater systems. The City's investment in these projects aims to ensure equitable access to services, improve circulation, and enhance accessibility to essential public services.

As noted above, Program 5.7 in Chapter 3 outlines actions for the City to ensure the CIP prioritizes moderate resource areas for investment to support housing development. It also establishes specific actions for infrastructure improvements needed in the Master Plan area. These efforts aim to address the greater needs in these areas and facilitate the development of housing while improving overall infrastructure across the City.

4.5 Environmental Constraints

The City participated in the 2022 Stanislaus County Multi-Jurisdictional Hazard Mitigation Plan, which addresses vulnerabilities from natural and human-caused hazards, including flooding, drought, wildfire, landslides, severe weather, terrorism, cyber threats, pandemics, and the impacts of climate change. Patterson is located in a region with high seismic activity and is about 20 miles from the Greenville Fault and 15 miles from the Ortigalita Fault, making the city susceptible to earthquake impacts. While the overall earthquake risk in Stanislaus County is medium, it is high for western and southern communities, including Patterson. Small areas in northern Patterson fall within the Federal Emergency Management Agency's (FEMA) 1 percent annual chance flood zone. Although the city is not in a Fire Hazard Severity Zone, it is adjacent to areas with high wildfire risk.

The City implements regulations and programs to minimize risks from seismic, flood, and wildfire hazards, including the Land Use Element, Community Design Element, Health and Safety Element, City Building Code, and building permit process. There are no known environmental constraints on the identified sites in the Site Inventory, and each project will undergo site-specific environmental review to ensure compliance with safety regulations.

Parcel Shape and Access of Identified Housing Opportunity Sites

The shape of a parcel can significantly impact development by influencing site layout, building design, and infrastructure placement. Regularly shaped parcels, such as rectangles or squares, are generally easier to develop, allowing for efficient use of space and standard construction practices. Irregularly shaped parcels, like triangles or narrow lots, may require creative design solutions to maximize buildable area and ensure proper access, parking, and setbacks. While unusual shapes can present challenges, they do not necessarily prevent development if the parcel is large enough to accommodate the intended use.

Site 3, owned by the Stanislaus Regional Housing Authority, is the only triangular-shaped parcel, and has access potential on four sides. However, its size is sufficient to support the planned housing, so its shape does not pose any constraints. All other identified housing opportunity sites have regular parcel shapes and adequate access to existing city streets and roads.

Easements

As part of the Zacharias development area, two key easements will be required: one for the Patterson Irrigation District (PID) canal and another for the West Stanislaus Irrigation District (WSID). The PID easement is planned to run north to south along the eastern edge of the Keystone Ranch and Lakeside Hills development areas. It will be placed underground and designed to accommodate a Class I bike path paseo above the approximately 40-foot-wide corridor. Similarly, the WSID easement will run north to south along Baldwin Road, west of the Lakeside Hills and Keystone Ranch development areas, and will also be located underground with a bike and pedestrian pathway constructed over the approximately 30-foot-wide corridor. The City has been in active communication with both irrigation districts and does not anticipate these easements posing any constraints to the development of residential uses within the Master Plan Area.

Site Contamination

None of the identified housing opportunity sites are located on a parcel that is included on any list compiled pursuant to Section 65962.5 of the Government Code, including:

- California Environmental Protection Agency's Cortese List (Health and Safety Code Section 25187.5);
- State Water Resources Control Board's GeoTracker (Health and Safety Code Section 25295 and Water Code Sections 13273 and 13301); and
- California Environmental Protection Agency's list of solid waste sites identified by the Water Board with waste constituents above hazardous waste levels outside the waste management unit (Health and Safety Code Section 116395).

4.6 Financial Resources for Affordable Housing

The City of Patterson promotes affordable housing through its Inclusionary Housing Program (Chapter 18.86 of the Municipal Code), requiring new developments to include a minimum percentage of affordable units for lower- and moderate-income households. The City of Patterson does not receive direct CDBG (Community Development Block Grant) or HOME funds from the U.S. Department of Housing and Urban Development (HUD). Instead, it participates in the Stanislaus County Block Consortium, which includes several cities within the county. Through this consortium, Patterson is able to access CDBG and HOME funds for affordable housing development and community projects

Community Development Block Grant

Non-entitlement jurisdictions, including cities with populations under 50,000 and counties under 20,000 that do not participate in the federal CDBG entitlement program, can apply for funding through HCD's CDBG Program. This program supports rural cities and counties in expanding community and economic development opportunities for low- and moderate-income residents. The City is committed to applying for CDBG funding to support program implementation to assist lower-income households and to facilitate the development of affordable housing.

Permanent Local Housing Allocation

HCD released approximately $24 million in funding through the Permanent Local Housing Allocation (PLHA) program to support local governments in addressing housing needs, including those of unhoused and low-income residents. The City of Patterson is committed to applying for PLHA funds to acquire land to facilitate the development of deed-restricted affordable residential units, and to implement other housing-related programs.

Low Income Housing Tax Credits

The Low-Income Housing Tax Credit (LIHTC) program incentivizes private developers and investors to create affordable housing by offering federal and state tax credits to offset construction costs. These federal tax credits are allocated to each state based on population, with the California Tax Credit Allocation Committee managing both the federal and state LIHTC programs in California. These tax credits support both new construction and the rehabilitation of existing properties, prioritizing projects that serve lower-income households and maintain affordability for the longest period.

Self-Help Enterprises is a local nonprofit in Patterson that leverages LIHTC to develop affordable housing. One notable project is Stonegate Village, a 138-unit affordable rental community. This development, funded in part by LIHTC, provides housing for low-income residents and includes various community amenities. Self-Help Enterprises has been instrumental in supporting affordable housing efforts in Patterson, combining LIHTC with other funding sources to meet local housing needs.

4.7 Local Housing Developers

Over the past eight years, the City of Patterson has seen increased interest from developers such as Self-Help Enterprises, KB Homes, Lennar, and DR Horton, which have significantly expanded housing options in the city's western and eastern areas. The City has partnered with these developers to focus on residential projects, public amenities, and infrastructure in the city's western and eastern regions.

The eastern region, a moderate resource area, has long needed investment to boost housing availability and improve infrastructure and resources. Self-Help Enterprises and KB Home have paved a path for new residential opportunities and increased resources for residents in the eastern region of the city.

Self-Help Enterprises, a nonprofit providing affordable housing across the San Joaquin Valley, completed Stonegate Village in 2021. This 138-unit affordable rental development features 46 one-bedroom, 46 two-bedroom, and 46 three-bedroom apartments. Amenities include a playground, basketball court, picnic areas, BBQ grills, and an on-site laundry room. A central community building offers a computer lab, site-wide Wi-Fi, and space for resident services like exercise classes, afterschool programs, and wellness initiatives. Energy-efficient features include a Solar PV system and transit-friendly additions such as a bus pullout and shelter with solar lighting. Self-Help Enterprises also partnered with Spectrum Energy Development Inc. to develop a pilot Net Energy Metering program. Monthly rents, based on unit size and resident income, range from $364 to $1,011, ensuring long-term affordability.

KB Homes' Sycamore Ranch community at Patterson Ranch offers three to six-bedroom homes starting at $476,990, catering to large households, while Acacia at Patterson Ranch provides three to four-bedroom units starting at $453,990. Both communities feature parks, easy access to State Route 33 and I-5, and public transit to promote commuter-friendly options. These communities are both currently under construction.

In the western region of Patterson, marked by underutilized industrial land, newly annexed areas, and recent development, Lennar, DR Horton, and Landsea Homes are spearheading significant residential projects. Lennar is currently developing two communities, Holly Oak and Magnolia, within the Baldwin Ranch North development area. Holly Oak features three- to four-bedroom homes priced between $472,000 and $583,880, while Magnolia offers similar units, priced from $499,880 to $579,880. Both communities contribute to expanding housing options in the city's southwestern region and are actively marketing units for sale.

Similarly, DR Horton is constructing the Meadows community, also within the Baldwin Ranch North development area. Meadows offers three- to four-bedroom homes ranging from 1,602 to 2,065 square feet, priced between $485,000 and $543,000. These homes are designed to cater to families, featuring open-concept kitchens and shared living spaces, with units currently available for purchase. Additionally, DR Horton offers a plan with an ADU which is popular with buyers.

Landsea Homes is constructing the Blossom community, which features larger three- to four-bedroom homes ranging from 1,766 to 2,449 square feet, priced between $504,403 and $599,815. With three floorplans available, Blossom accommodates a variety of household needs, with units currently on the market.

Located just south of these up-and-coming communities, the Baldwin Ranch South development area further enhances the appeal of these communities by providing approximately six acres of parkland. Additionally, residents will benefit from the proximity to the Patterson Joint Unified School District, which includes Apricot Valley Elementary, Creekside Middle School, and Patterson High School, offering convenient access to educational facilities.

Affordable Housing Providers

Affordable housing providers are a critical resource to achieving the goals and objectives outlined in this Housing Element, often through private/public partnerships. Table 4-13 highlights the active affordable housing providers and the related affordable housing developments in Patterson, showcasing the collaborative efforts to meet the community's housing needs.

City of Patterson's Commitment to Facilitating Housing Production

As previously mentioned, Self-Help Enterprises is an experienced affordable housing developer managing 1,347 affordable rental units across 28 sites in the San Joaquin Valley. They leverage Low-Income Housing Tax Credits and Affordable Housing and Sustainable Communities programs to finance their projects, which often require complex capital structures and development concessions from local jurisdictions to ensure feasibility.

Table 4-13 Affordable Housing Providers in Patterson

Organization	Development Name	Address	Housing Type
Self-Help Enterprises	Stonegate Village	625 Logan Way, Patterson, CA 95363	Multi-Family
Stanislaus Regional Housing Authority	Las Palmas Senior Housing Complex	1075 W. Las Palmas Avenue, Patterson, CA 95363	Senior
The Michael's Organization	El Solyo Village	850 N 2nd Street, Patterson, CA 95363	Senior
Stanislaus Regional Housing Authority	Patterson Place Apartments	670 N 6th Street, Patterson, CA 95363	Multi-family
Stanislaus Regional Housing Authority	Patterson Migrant Farmworker Housing Center	N/A	Farmworker

SOURCE: City of Patterson, 2024

The City of Patterson partnered with Self-Help Enterprises to develop Stonegate Village, an affordable multi-family rental housing project in the city's eastern region. To incentivize Self-Help Enterprises and ensure feasibility of the project, the City employed several strategies, including accepting development concessions that made the project more feasible. These included increasing densities to 20 dwelling units per acre, above the standard 5.1 to 12 dwelling units per acre for medium-density residential areas, and reducing parking requirements. These concessions ensured the project met eligibility for the State Density Bonus and Affordable Housing and Sustainable Community funding, which were essential for its financial viability.

The City's willingness to collaborate with the developer by accepting development concessions directly enabled the successful development of affordable housing at Stonegate Village. Patterson remains committed to working with nonprofit affordable housing developers to ensure that affordable housing for lower-income households is built to meet the city's growing housing needs. Dedicated housing staff will lead the effort to guide developers toward areas where targeted investment and residential development are most needed to create a balanced community. Developer incentives and project concessions will be evaluated and negotiated on a case-by-case basis, with assistance provided in securing funding to ensure project feasibility (see Program 1.6 Affordable Housing Development in Chapter 3).

4.8 Administrative Resources

This section outlines the City of Patterson's available administrative resources, including building services, code enforcement, housing programs, and collaborations with nonprofit organizations. These resources help the city achieve the goals and objectives set forth in this Housing Element.

City of Patterson Planning Services

The Planning Division of the Community Development Department provides and coordinates development information and services to the public. Specifically, the Planning Division provides staff support to the City Council and Planning Commission in formulating and administering plans, programs, design guidelines, and legislation for guiding the city's development in a manner consistent with the community's social, economic, and environmental goals.

The Planning Division is tasked with ensuring that land uses and new development in Patterson comply with City codes, the General Plan, City Council and Planning Commission policies, and state law. Approval of projects through the planning process is required before the City issues grading or building permits. Advanced planning programs provided by the Planning Division include a comprehensive General Plan update (including periodic update of the Housing Element), preparing and amending specific plans and design guidelines, and conducting special land use studies as directed by the City Council.

The City's Planning Division includes a dedicated Housing Program Coordinator, providing focused oversight and management of housing initiatives. This role streamlines processes, improves efficiency, and ensures compliance with local and state regulations. During the planning period, the coordinator will lead the implementation of housing programs, oversee the execution of the city's Housing Element, and manage affordable housing projects. Additionally, the coordinator will foster partnerships with nonprofit organizations, all contributing to the City's long-term housing goals.

County of Stanislaus

The Stanislaus Regional Housing Authority applies for and administers several federal housing programs, primarily through HUD. These include:

- Housing Choice Voucher (Section 8) Program: This program helps very low-income families, the elderly, and the disabled afford decent and safe rental housing in the private market by providing rental assistance;
- Public Housing Program: The Housing Authority manages conventional public housing units funded by federal assistance, offering affordable housing to low-income families, the elderly, and people with disabilities; and
- Migrant and Farm Labor Housing Programs: These programs provide affordable housing to seasonal and year-round farmworkers.

These programs are designed to assist residents in Stanislaus County with affordable housing options through rental subsidies and housing assistance initiatives. The Housing Authority works to ensure compliance with HUD guidelines while providing these essential services.

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Assessment of Fair Housing

A

APPENDIX

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Appendix A
Assessment of Fair Housing

A.1 Introduction and Overview

California Government Code Section 8899.50 requires local agencies to affirmatively further fair housing (AFFH). Under California law, AFFH means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." Government Code Section 8899.50 stipulates that an assessment of fair housing (AFFH) includes the following components:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity;
- An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk;
- An assessment of the contributing factors for the fair housing issues identified under Government Code Section 65583 (10)(A)(ii);
- An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to those factors identified in Government Code Section 65583 (10)(A)(iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance, and identifying the metrics and milestones for determining what fair housing results will be achieved; and
- Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies, and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement.

A.2 Approach to Analysis

This AFFH has been prepared consistent with the California Department of Housing and Community Development (HCD) Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance Memo), which provides guidance on the preparation of housing elements and ensures statutory requirements are satisfied, pursuant to Government Code Section 65583(c)(10).

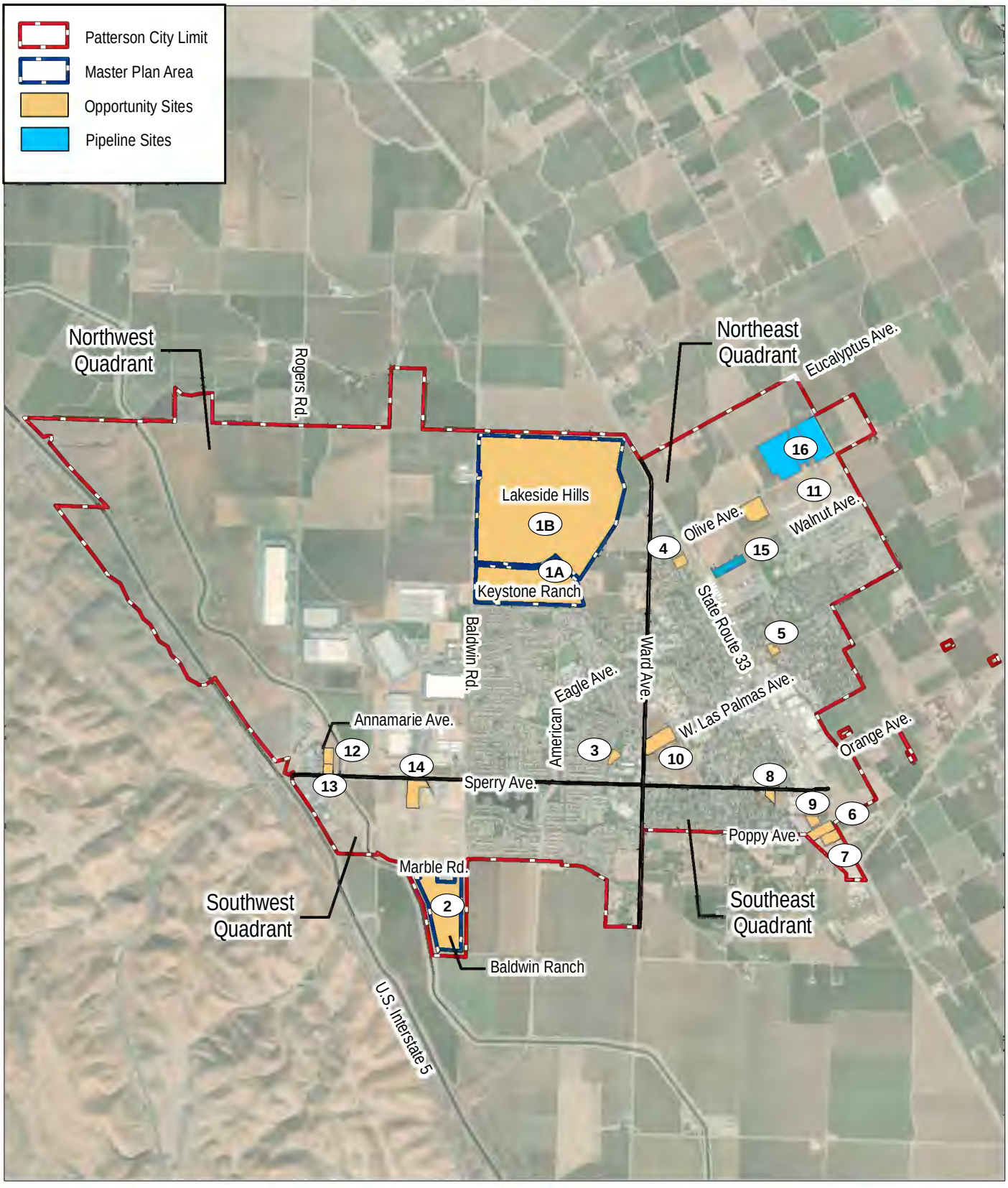
This AFFH evaluates fair housing issues on the following topics:

- Fair Housing Enforcement and Outreach Capacity;
- Integration and Segregation Patterns and Trends;
- Racially and Ethnically Concentrated Areas of Poverty;
- Disparities in Access to Opportunity;
- Disproportionate Housing Needs; and
- Other Relevant Factors, including historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

This AFFH addresses impediments through AFFH specific goals and actions based on the contributing factors for each identified fair housing issue. To identify specific areas in Patterson, the analysis divides the city into quadrants as follows:

- Northwest Quadrant: north of Sperry Avenue and west of Ward Avenue;
- Southwest Quadrant: south of Sperry Avenue and west of Ward Avenue;
- Northeast Quadrant: north of Sperry Avenue and east of Ward Avenue; and
- Southeast Quadrant: south of Sperry Avenue and east Ward Avenue.

Figure A-1 illustrates the location of housing opportunity sites according to quadrant.



Source: ESRI 2024, Stanislaus County GIS 2024

Figure A-1

Identified Housing Opportunity Sites by Quadrant

City of Patterson 6th Cycle Housing Element

A.3 Fair Housing Methodology

Government Code Section 65583 (10)(A)(ii) requires cities and counties to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

To conduct this analysis, the City utilized data from a variety of sources, including:

- The HCD AFFH Data Viewer;
- Urban Displacement Project (UDP);
- U.S. Housing and Urban Development (HUD);
- California Communities Environmental Health Screening Tool (CalEnviroScreen);
- California Tax Credit Allocation Committee (TCAC);
- The Comprehensive House Affordability Strategy (CHAS); and
- U.S. Census American Community Survey (ACS).

Additionally, the analysis includes a discussion of historic land use and segregation patterns and input from sources of local knowledge, including advocates for people with special needs, advocacy organizations, housing and social services providers, and Patterson residents.

California Department of Housing and Community Development Affirmatively Furthering Fair Housing Data Viewer

The AFFH Data Viewer is a tool developed by HCD that features census block group and tract-level data from an expansive collection of sources, including ACS, HUD, TCAC, UDP, and CHAS. The Data Viewer tool serves as a resource for local and regional governments and provides the ability to explore spatial data patterns concerning fair housing enforcement, segregation, and integration, racially and ethnically concentrated areas of poverty, and disparities in access to opportunities and housing. The Data Viewer is intended to assist in the creation of policies that alleviate disparities, combat discrimination, and increase access to safe and affordable homes.

Urban Displacement Project

The UDP was developed to track neighborhood change and identify areas that are vulnerable to gentrification and displacement in California. Indicators of gentrification and displacement are measured at the census tract level based on data from the 2015-2019 ACS. UDP indicators examine census tracts to identify areas that qualify as disadvantaged neighborhoods. Additionally, census tracts identified as disadvantaged neighborhoods by UDP's criteria are further analyzed to explore changes in the percentage of college educated residents, non-Hispanic white population, median household income, and median gross rents over time to determine levels of gentrification and displacement risk.

CalEnviroScreen

The California Office of Environmental Health Hazard Assessment developed a screening methodology to identify communities disproportionately burdened by multiple sources of pollution. CalEnviroScreen utilizes existing environmental, health, and socioeconomic data to rank census tracts based on 20 distinct indicators. In general, if a community has a high score for that indicator, it is more impacted by pollution burdens and population vulnerabilities compared to other communities. Designated disadvantaged communities are those with CalEnviroScreen percentile scores of 75 or higher, meaning that they scored within the highest 25 percent of census tracts across California. Patterson continues to explore programs and policies to address community pollution, environmental health, access to open space, and government decision-making through existing policies of the General Plan.

California Tax Credit Allocation Committee

To assist fair housing analysis, HCD and TCAC created the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies and departments to further the state's fair housing goals. The California Fair Housing Task Force created Opportunity Maps to identify resource levels across the state to accompany new policies aimed at increasing access to high-opportunity areas for families with children.[1] Opportunity Maps are made from composite scores of the following three domains and associated indicators:

- Economic Domain: Indicators include poverty, adult education, employment, job proximity, median home value;
- Environmental Domain: Indicators include CalEnviroScreen 4.0 pollution indicators and values; and
- Education Domain: Indicators include math proficiency, reading proficiency, high school graduation rates, student poverty rates.

The Opportunity Maps include filters to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- Poverty Status: census tracts with at least 30 percent of population that earned an income that was below the federal poverty level; and
- Racial Segregation: census tracts with a location quotient that is higher than 1.25 for Black, Hispanic/Latino, Asian, or all non-white populations in comparison to the county.

[1] Office of The State Treasurer. 2021. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcaF-hcd-methodology.pdf

AllTransit

AllTransit is an online database that details transit opportunities for communities. The website explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The AllTransit performance score explores metrics that reveal the social and economic impact of transit, such as connectivity, access to jobs, and frequency of service.

A.4 Fair Housing Resources

Ability to Address Complaints

For the purposes of addressing discrimination complaints, the City of Patterson relies on Project Sentinel. Project Sentinel is a non-profit organization whose primary function is to assist individuals with housing problems such as discrimination, mortgage foreclosure & delinquency, rental issues including repairs, deposits, privacy, dispute resolution, home buyer education, post purchase education and reverse mortgages. Project Sentinel has a regional office, situated in Modesto, that handles the fair housing complaints for Stanislaus County.

Enforcement and Outreach Capacity

Fair housing complaints can be used as an indicator to identify characteristics of households experiencing discrimination in housing. Pursuant to the California Fair Employment and Housing Act Government Code Section 12921(b), the opportunity to seek, obtain, and hold housing cannot be determined by an individual's "race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, genetic information, or any other basis prohibited by Section 51 of the Civil Code."

Fair housing issues that may arise in any jurisdiction include, but are not limited to:

- Housing design that makes a dwelling unit inaccessible to an individual with a disability;
- Discrimination against an individual based on race, national origin, familial status, disability, religion, sex, or other characteristics when renting or selling a housing unit; and
- Disproportionate housing needs, including cost burden, overcrowding, substandard housing, and risk of displacement.

The City refers discrimination complaints directly to Project Sentinel in Modesto. The following resources are available to Patterson residents:

- Stanislaus Regional Housing Authority;
- Project Sentinel Central Valley Services;

- State of California Civil Rights Department;
- California Rural Legal Assistance; and
- Center for Community Advocacy.

To expand outreach and capacity efforts, the City has partnered with the Patterson Family Resource Center to disseminate resources and information about fair housing rights and how to file a fair housing complaint, in conjunction with the Stanislaus Regional Housing Authority.

Regional and Local trends

The AFFH Data Viewer indicates that the majority of incorporated areas in Stanislaus County had at least one Fair Housing and Equal Opportunity (FHEO) inquiry between 2013 and 2022. Notably, Ceres received 12 inquiries, Turlock 15, and Modesto 99. While most inquiries in the County were categorized as "no basis given," a small number were related to retaliation, sex, and disability. In Patterson, nine FHEO inquiries were recorded, with seven listed as "no basis given" and one each citing religion and national origin. Regarding FHEO cases filed during the same period, most incorporated areas also had at least one case. Ceres had four cases filed, Turlock had 14, and Modesto had 64. In Patterson, one case was filed.

Local Perspective

Although the AFFH Data Viewer reported only one FHEO case in Patterson between 2013 and 2022, Project Sentinel recorded 13 FHEO cases in Patterson in 2016. Table A-1 identifies reported cases according to basis. These cases addressed a range of issues, including national origin, familial status, race, disability, source of income, gender, and sex discrimination. To ensure residents are aware of fair housing resources, the City has implemented Program 5.3, which promotes equal housing opportunities for all (see Chapter 3). This program includes educating residents on fair housing laws and tenant protections, providing translation services to assist with fair housing discrimination case referrals, and conducting extensive outreach to residents, landlords, and developers to ensure affordable housing options are accessible in Patterson.

Table A-1 Fair Housing Cases Filed, City of Patterson, 2016

Basis of Case	Number of Cases Filed
National Origin	3
Disability	3
Race	2
Source of Income	2
Gender	1
Sex	1
Familial Status	1

SOURCE: Project Sentinel, FHEO Case Reports, 2016

Compliance with Existing Fair Housing Laws

The City of Patterson complies with existing fair housing laws and regulations by ensuring all residents have equal access to housing programs, services, and resources and supporting any resident in filing complaints on housing discrimination. The City also ensures that the City's zoning regulations do not result in segregation or discriminatory practices and complies with the following fair housing laws:

- Fair Housing Act; Title VI of the Civil Rights Act of 1964 – the City has adopted housing policies that prohibit housing discrimination based on protected characteristics and ensuring equal access to housing programs and services;
- Rehabilitation Acts of 1973 – see Fair Housing Act; also, the City does not discriminate against persons with disabilities and promotes equal opportunities, accessibility, and independence for individuals with disabilities;
- Americans with Disabilities Act – the City complies with the ADA through building permit review and issuance;
- California Fair Employment and Housing Act (FEHA) and FEHA Regulations ((Part 2.8 commencing with section 12900) of Division 3 of Title 2) – the City complies with FEHA and its regulations by upholding policies that prohibit housing discrimination based on protected characteristics and enforces these policies by supporting residents seeking to file a complaint to the FHEO or who wish to pursue legal action;
- Anti-Discrimination in Zoning and Land Use (Government Code Section 65008) – the City does not discriminate or deny any individual or group of individuals the right to residence, land ownership, tenancy, or other land use on the basis of one's membership or perceived membership in a protected class, method of financing, and/or the intended occupancy. The City has adopted housing policies that prohibit discrimination based on protected characteristics. Programs 5.1 – 5.8 in this Housing Element commit the City to providing information on fair housing and services offered in the region (see Chapter 3). Additionally, Table 3-5 in Chapter 3 provides a comprehensive list of all programmatic actions to affirmatively further fair housing;
- Government Code Section 8899.50 – Appendix A of this Housing Element documents compliance with Affirmatively Furthering Fair Housing requirements;
- Equal Access (Government Code Section 11135 et. seq.) – the City does not discriminate or deny any individual or group of individuals access to programs or activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class. The City included Programs 5.1 – 5.8 in this Housing Element to promote affordable housing opportunities and resources, including Housing Choice Vouchers, shared housing programs, and fair housing resources (see Chapter 3);

- Density Bonus Law (Government Code Section 65915) – the City last updated their Density Bonus provisions in the Municipal Code in 2013. In compliance with State law, the City will update its Density Bonus provisions outlined in the Municipal Code to be consistent with recent changes to the State Density Bonus Law. Program 1.4 will regulate this amendment to the Code (see Chapter 3);
- Housing Accountability Act (Government Code Section 65589.5) – the City has documented compliance with the HAA as described in Chapter 1 (Housing Needs and Constraints Assessment). The City will approve any eligible housing development projects, including those with at least 20 percent affordable units to lower-income households;
- Least Cost Zoning Law (Government Code Section 65913.1) – the City includes programs in this Housing Element to ensure that sufficient land is zoned with appropriate standards to accommodate its RHNA;
- Excessive subdivision standards (Government Code Section 65913.2) – the City's subdivision standards are typical or not excessive in compliance with Government Code;
- Limits on growth control (Government Code Section 65302.8) – the City complies with the Limits on Growth Controls Law. The City has not adopted any mandatory general plan elements which limit the number of housing units; and
- Housing Element Law (Government Code Section 65583) – this Housing Element documents compliance with Housing Element Law.

The City has not been involved in any past lawsuits, consent decrees or other related fair housing legal matters.

A.5 Segregation and Integration

To guide priorities, policies, and actions, the housing element must analyze integration and segregation patterns and trends. Integration refers to a condition where there is not a high concentration of people based on race, color, religion, sex, familial status, national origin, or disability in a specific area. Conversely, segregation indicates a high concentration of these characteristics in certain areas. This analysis examines integration and segregation trends both regionally (in Stanislaus County) and locally (in Patterson). It utilizes data from sources such as the 2016–2020 ACS, HCD's AFFH Data Viewer, HUD, UDP, the CDC, and other regional and federal agencies, along with input from community engagement.

Residential segregation and exclusion, whether by race, ethnicity, disability, or income, result from various public and private housing policies, practices, and procedures that have had long-lasting negative impacts. Discriminatory land use policies, housing market shifts, and patterns of investment

and disinvestment have restricted fair housing choices and equitable access to opportunities, particularly for communities of color. Despite the Fair Housing Act of 1968 mandating federal agencies and grantees to affirmatively further fair housing, historic segregation patterns persist in California. Past and present discriminatory policies, including disinvestment, have led to neighborhoods with concentrated poverty, poor housing conditions, limited opportunities, unsafe environments, underfunded schools, and inadequate infrastructure. Additionally, government policies have subsidized the development of segregated, high-resourced suburbs by constructing highways through lower-income communities of color to ensure access to urban job centers. This infrastructure perpetuates discrimination and segregation patterns that continue to exist in California and across the nation, despite over 50 years of fair housing obligations.[2]

Race and Ethnicity

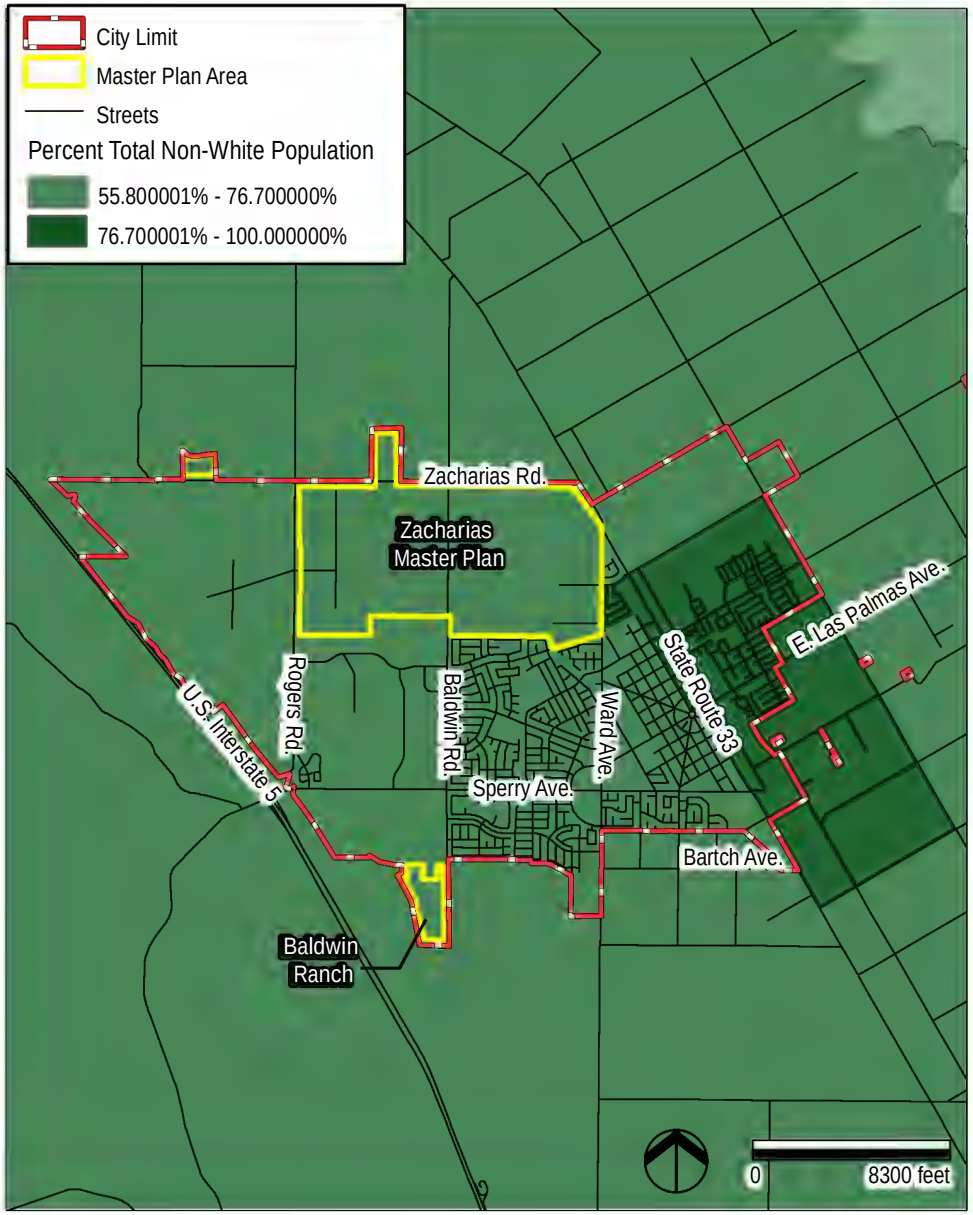
Examining the demographic, ethnic, and racial composition of a region is vital to understanding fair housing concerns including access to economic opportunity and safe and affordable housing. Historic exclusionary governmental policies, biased mortgage lending practices, and other tactics have caused racial and ethnic segregation and spatial inequities. This section provides an overview of racial/ethnic composition and segregation patterns within Stanislaus County and Patterson.

Regional and Local Trends

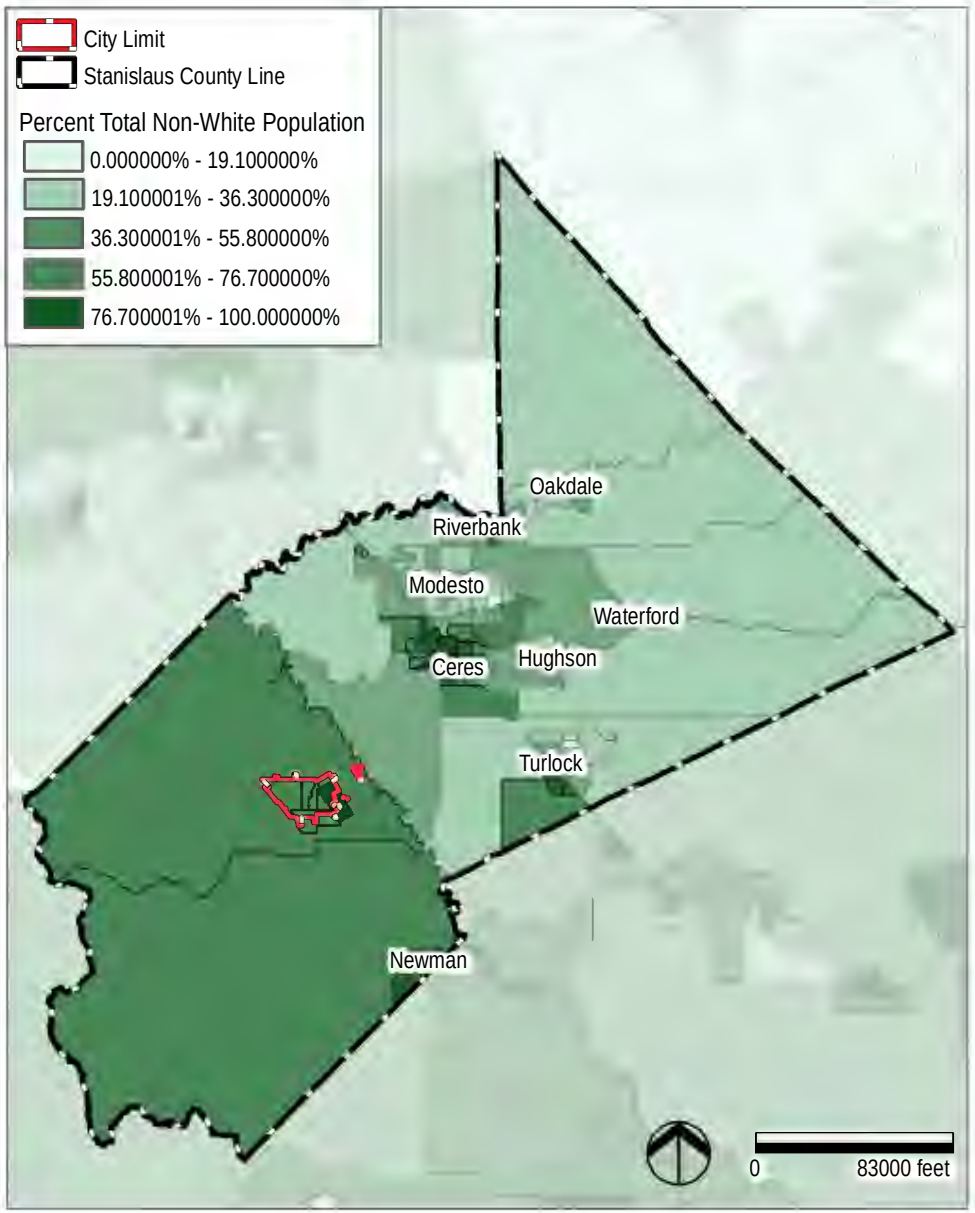
According to 2022 ACS 5-year estimates, the largest population represented in Stanislaus County and the City of Patterson is Hispanic or Latino, which comprise 48.6 percent in the county and 68.2 percent in Patterson. The second largest population is non-Hispanic White group, which represents 38.5 percent in the County and 17.6 percent in Patterson. Figure A-2 illustrates the percent of total non-White population in Stanislaus County and Patterson. Throughout the county, there is great variation in the percentage of total non-White population based on geographic area. The eastern region of the county, beyond Modesto, is predominantly characterized by the non-Hispanic White population. Whereas, in the western region, where Patterson is located, and along State Route 33, the Hispanic or Latino population is most predominant. In Patterson, the eastern quadrant of the city has higher percentages of Hispanic or Latino populations compared to the central and western quadrants.

In February 2017, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) partnered with independent organizations and research centers, collectively known as the "research partners," to provide evidence-based policy recommendations supporting HCD's fair housing goals. This collaboration led to the creation of Opportunity Maps, aimed at improving access to high-opportunity areas for families with children living in housing financed by Low-Income Housing Tax Credits (LIHTCs).

[2] https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-2

Percent Total Non-White Population

City of Patterson 6th Cycle Housing Element

Opportunity mapping measures and visualizes place-based characteristics linked to critical life outcomes, such as educational attainment, earnings, and economic mobility. These maps help guide investments and policies by considering how different places affect economic, educational, and health outcomes. A hybrid approach was used to create an objective mapping tool, considering regional differences while applying stricter standards to high-poverty, racially segregated areas. Areas meeting consistent standards for poverty (30 percent of the population below the federal poverty line) and racial segregation (overrepresentation of people of color relative to the county) were classified as "High Segregation & Poverty." The share of each region that falls into the High Segregation and Poverty category varies from region to region.

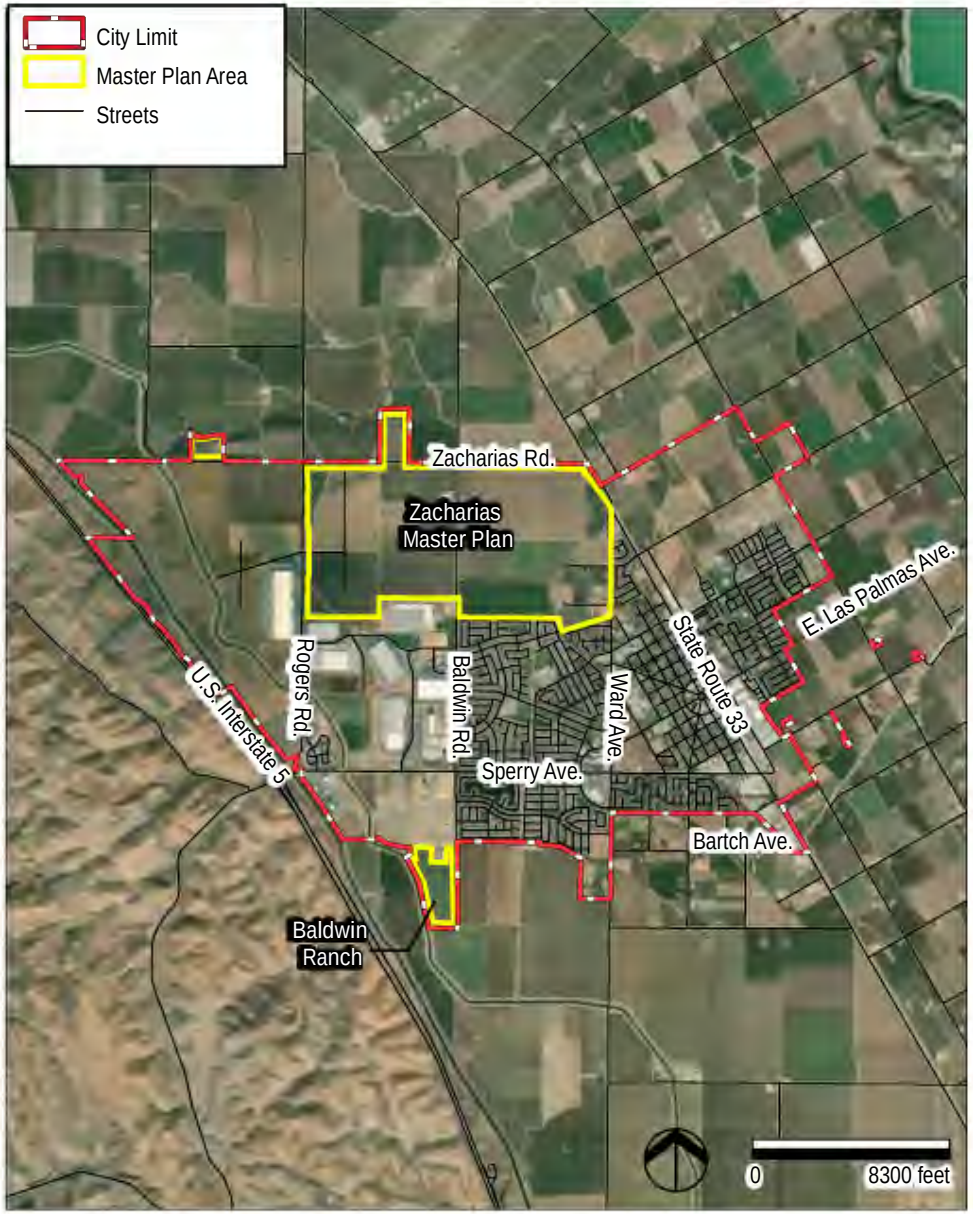
Figure A-3 illustrates high segregation and poverty in Stanislaus County and Patterson. As shown, high segregation and poverty in the county is concentrated along State Route 33, including the cities of Modesto and Turlock. There are no areas classified as high segregation and poverty in Patterson.

Localized Perspective

Based on local knowledge from County officials, Stanislaus County has a history of implementing race-based discriminatory practices and enforcing segregation through the use of restrictive covenants. Despite this practice being illegal for more than 50 years, the racist language of racially restrictive covenants still appears on Stanislaus property records during home-buying transactions to date.[3] The Stanislaus County clerk-recorder's office is in the process of searching millions of records for these discriminatory covenants that restricted property ownership in white-only sections and isolated minority families in substandard segregated neighborhoods. Stanislaus County is in compliance with AB 1466, which requires County Recorders to modify and/or redact restrictive and discriminatory language from official records. The County has developed a "Restrictive Covenant Modification" form for relevant real estate transactions.[4]

While County officials are not certain of the exact number of racially restrictive covenants still in existence in the City of Patterson, Stanislaus County is working to update its ArcGIS database and mapping software to compile all restrictive covenants within the County. Recently, Stanislaus County has mapped out the locations of historically segregated communities and areas where racially restrictive covenants were implemented within the City of Modesto.[5] While the mapping has not yet been updated for the City of Patterson, County officials anticipate compiling this data in the next few years.

[3] https://www.modbee.com/news/local/article273097685.html
[4] https://www.stancounty.com/clerkrecorder/pdf/restrictive-covenant-modification.pdf
[5] https://www.arcgis.com/apps/View/index.html?appid=5fe582a3eb0847949e5ce994a2761b73



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024,
California HCD 2024

Figure A-3

TCAC Areas of High Segregation and Poverty

City of Patterson 6th Cycle Housing Element

As a means to address and mitigate the effects of historical patterns of segregation, the City of Patterson has included the following programs within the Housing Action Plan (Chapter 3 of the Housing Element):

- Program 1.5: Inclusionary Housing Requirements;
- Program 4.5: Family-Friendly Housing;
- Program 5.1: Affirmatively Furthering Fair Housing;
- Program 5.2: Anti-Displacement Strategy;
- Program 5.6: Housing Choice Voucher (HCV) Program;
- Program 5.7: Targeted Capital Improvement Program Investment; and
- Program 5.9: Expanding Economic Mobility.

In the eastern quadrant of the city, a concentration of subsidized housing has likely contributed to the higher percentages of Hispanic or Latino populations in the area. Meanwhile, the western quadrant, characterized by newer single-family homes, remains less accessible to lower-income households due to affordability issues. However, this Housing Element targets multi-family residential development in the western quadrant of the city, where single-family homes are already under construction, including master-planned developments that will feature new public amenities like parks and schools. This strategic focus aims to break the existing geographic divide, ensuring that affordable housing is integrated into well-resourced, livable communities, rather than perpetuating segregation by income and ethnicity.

Persons with Disabilities

For persons with disabilities, fair housing choice and access to opportunity includes access to housing in the most integrated setting appropriate to an individual's special needs and disability related services as required under federal civil rights law. For example, persons with disabilities who are unable to use stairs or need a zero-step shower may not have actual housing choice without the presence of housing units with these accessibility features.[6]

High spatial segregation of persons with disabilities may indicate fair housing issues related to not only physical needs, but also economic disparities. According to the 2020 Annual Report on People with Disabilities in America, more than 25 percent of persons with disabilities (including physical, intellectual, and developmental; sensory; and other disability categories) live below the Census Bureau-designated poverty line, which is 14.5 percentage points higher than people without a disability.[7] Persons with disabilities may be more reliant than persons without disabilities on fixed incomes or access to public transit.

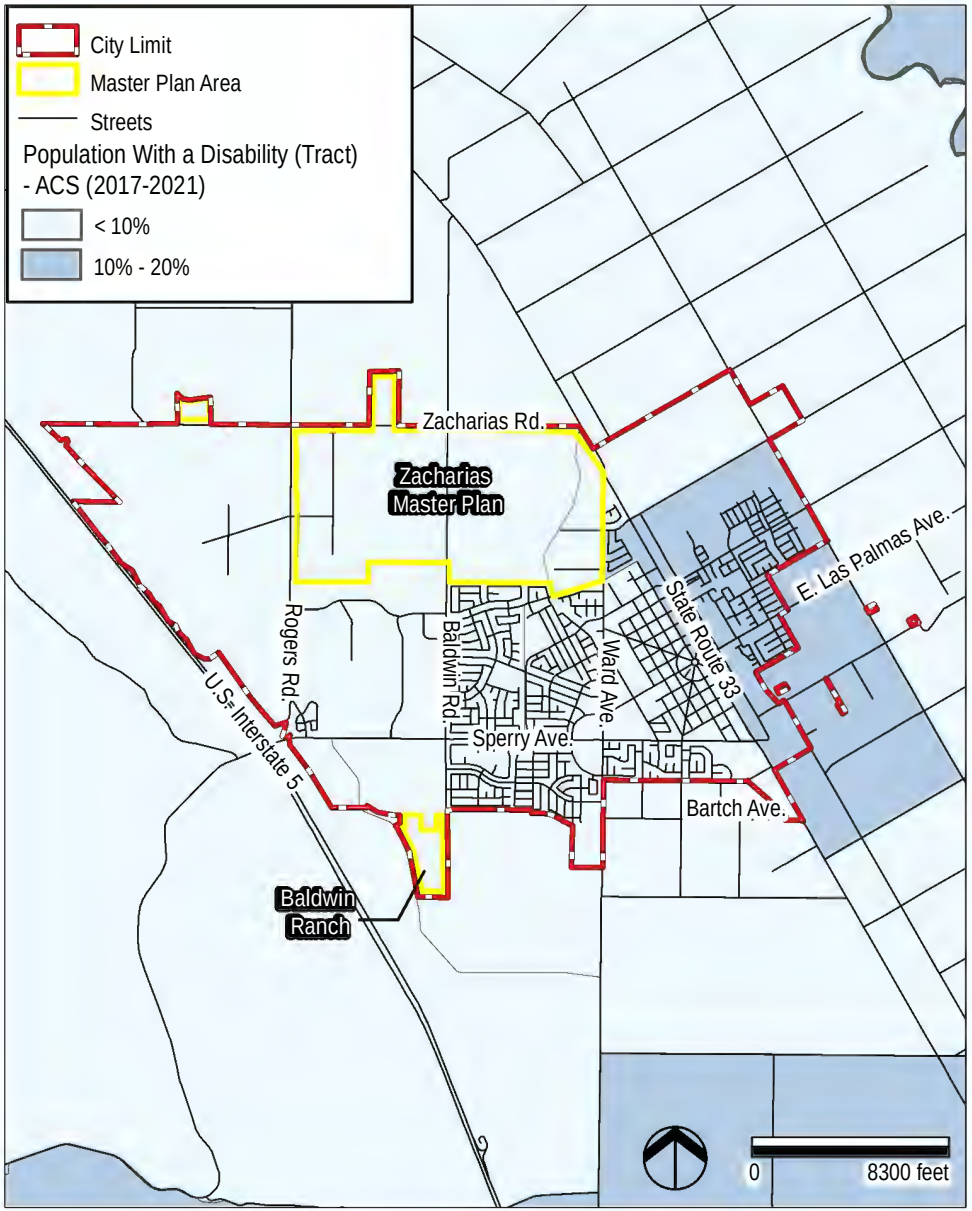
[6] HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf
[7] The Rehabilitation Research and Training Center on Disability Statistics and Demographics 2020. https://disabilitycompendium.org/annualreport

Regional and Local Trends

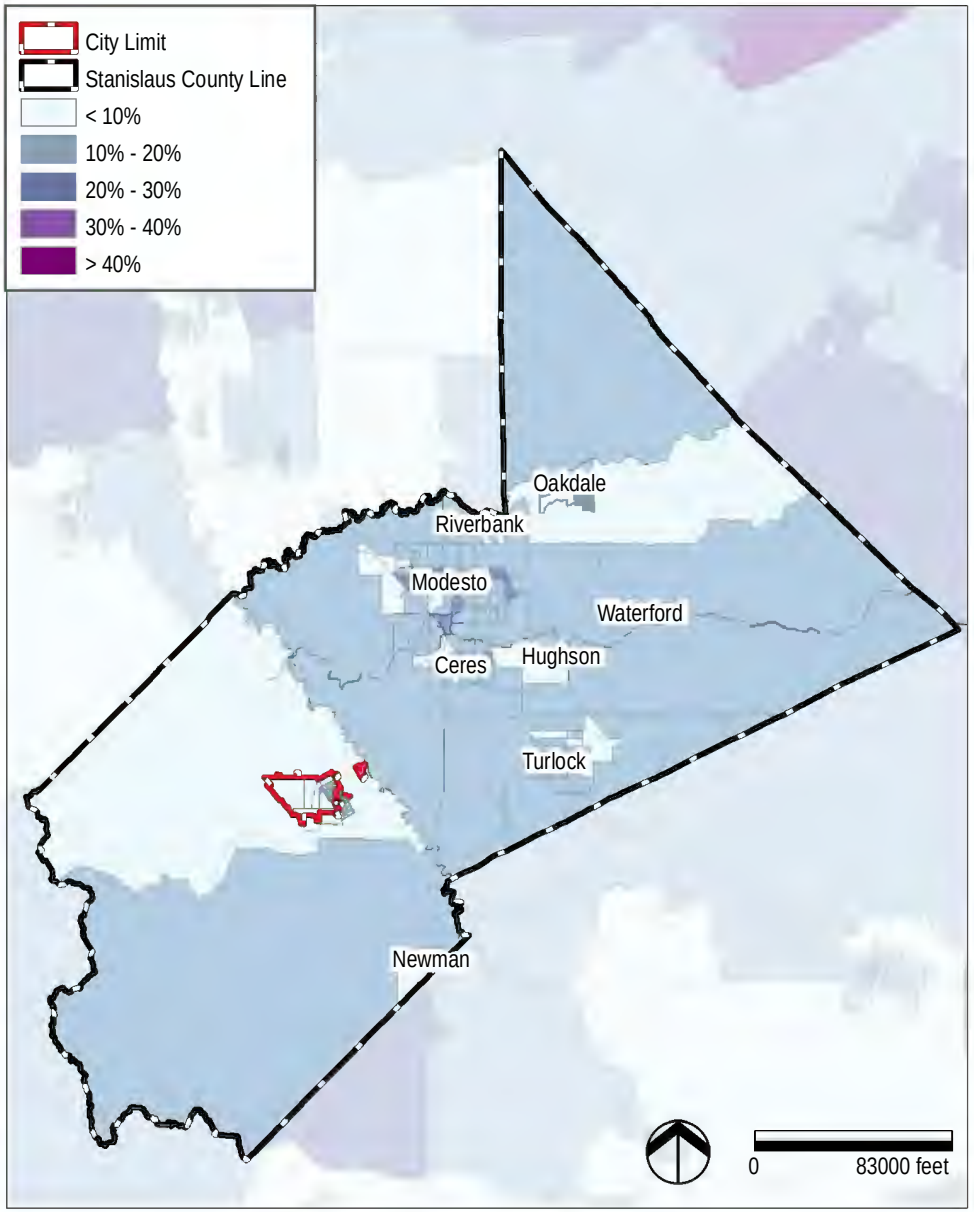
Figure A-4 illustrates the percentage of the population living with a disability in Stanislaus County and Patterson. Stanislaus County has higher percentages of individuals with disabilities, specifically along State Route 33 in Modesto, Ceres, and Turlock, where the concentrations range from 20 percent to 30 percent. In contrast, Patterson has a lower percentage of its population living with a disability, ranging from less than 10 percent to 20 percent. As shown in Figure A-4, the northeastern and southeastern quadrants of Patterson (east of State Route 33) have the highest concentrations, between 10 percent and 20 percent. According to the HCD AFFH Data Viewer, 772 individuals in this area have at least one disability (14.6 percent of the total population). This area also coincides with higher poverty rates (16.2 percent of the total population) and lower median income ($55,000 to $90,100). While the concentration of individuals with a disability in this area is low, the combination of poverty and lower median income may indicate a barrier to fair housing in the city. Detailed discussions of poverty status and median income in Stanislaus County and Patterson are provided in Section 4.5 Household Income and Poverty Status. Based on records of the Valley Mountain Regional Center[8] and the California Department of Social Services[9], there are no concentrations of residential care facilities or group homes in this region of the city.

Title II of the Americans with Disabilities Act (ADA) of 1990 prohibits discrimination against qualified individuals with disabilities from the participation of and/or benefit of services, programs, and activities. It may be used by anyone who believes that they have been discriminated against and wishes to file a complaint with the City of Patterson. In accordance with Title II of the ADA, the City has developed an ADA webpage, which includes information regarding the Act and procedures for submitting an ADA Complaint Grievance. This information is provided in both English and Spanish.

[8] https://www.vmrc.net
[9] https://www.ccld.dss.ca.gov/carefacilitysearch/



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-4

Percent Population with One or More Disabilities

City of Patterson 6th Cycle Housing Element

As mentioned in Chapter 1, Housing Needs and Governmental and Non-Governmental Constraints Assessment, the City implements ADA and California Building Code compliant standards for both public and private projects and offers exceptions to land use policies, procedures, and development standards to ensure that the needs of people with disabilities are taken into account. In accordance with Federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act (hereinafter "Acts"), the City's reasonable accommodation policy provides individuals with disabilities reasonable accommodation to rules, policies, practices, and procedures to ensure equal access to housing and facilitate the development of housing for individuals with disabilities. The policy further discusses the procedure and requirements to file for reasonable accommodation. These resources are highly important to reduce lack of mobility, poverty, and overcrowding issues that individuals with disabilities in Patterson may face. Additional resources available to individuals with disabilities are provided in Chapter 1. The City has not received any requests for reasonable accommodation in the past eight years. Additionally, the City continues to implement capital improvement projects throughout the city, focusing on pedestrian safety. Several projects are underway, including the Las Palmas Overlay, which involves repaving sidewalks with rubberized pavement and reconstructing curb ramps and crosswalks to meet ADA standards. This project is located in the southeastern quadrant of the city, along Las Palmas Avenue, stretching from State Route 33 to the eastern city limits.

Localized Perspective

According to the *Stanislaus County Fiscal Year 2020-2025 Regional Analysis of Impediments* (hereinafter "analysis of impediments"), disability was the most common basis for housing discrimination complaints to the Department of Fair Employment and Housing (DFEH) in the county in 2019. In Patterson, a total of six fair housing complaints were reported (2014-2019). The specific basis for the complaints was not identified. This is relatively low compared to nearby jurisdictions, including Ceres (30 complaints), Modesto (165 complaints), and Oakdale (21 complaints). The analysis of impediments identified the following impediments to fair housing related to protected classes, including individuals with disabilities:

- Insufficient supply of affordable housing;
- Shortage of subsidies and strategies to promote affordable, accessible housing for low-, very low-, and extremely low-income households, including protected classes;
- Limited knowledge of fair housing rights;
- Discrimination in rental housing;
- Local development standards and their implementation, e.g., zoning, building, or design standards, may constrain development of housing opportunities for minority and low-income households; and
- Inadequate access to employment opportunities, transportation, and public and social services, and infrastructure to support increased housing opportunities for lower-income households.

To address these impediments and mitigate impacts, the City is actively engaging with both non-profit affordable housing developers and reputable for-profit developers interested in constructing affordable multi-family housing. Additionally, the City is committed to applying for various funding sources, such as CDBG Funds, LEAP and REAP grants, and Prohousing Designation funds, to support affordable housing development. As part of its efforts, the City complies with Title II of the ADA, providing residents with guidance on how to submit an ADA Complaint Grievance form, ensuring that individuals can report disability-based discrimination. The City's Municipal Code also outlines procedures for requesting reasonable accommodation, allowing for exceptions to development standards for individuals with disabilities.

Furthermore, the City has developed a suite of place-based strategies, detailed in Chapter 3, to specifically target the northeastern and southeastern quadrants of the city, aiming to improve economic mobility, educational outcomes, and infrastructure in these areas. These actions are intended to improve existing conditions in this region of the city as they relate to fair housing issues for individuals with disabilities.

Familial Status

According to the Fair Housing Act, familial status refers to the presence of children under the age of 18 in a household with a legal guardian or designee of such guardian.[10] HUD provides examples of familial discrimination as (a) refusing to rent to families with children; (b) evicting families once a child joins the family through, e.g., birth, adoption, custody; (c) requiring families with children to live on specific floors or in specific buildings or areas; (d) imposing overly restrictive rules about children's use of the common areas (e.g., pools, hallways, open spaces); (e) and in advertising that prohibits children.[11] Single-parent households are protected by Government Code Section 65583(a)(7). Because of their relatively lower incomes and higher living expenses, single-parent households can have limited options for affordable, decent, and safe housing. As a result, single parents are among the groups most at risk of experiencing poverty.

In addition to barriers to fair housing for single-parent households, large families (defined as families with 5 or more persons) can also experience housing discrimination as property owners impose occupancy limitations that can preclude large families with children. HUD data shows that familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to disability and race.[12]

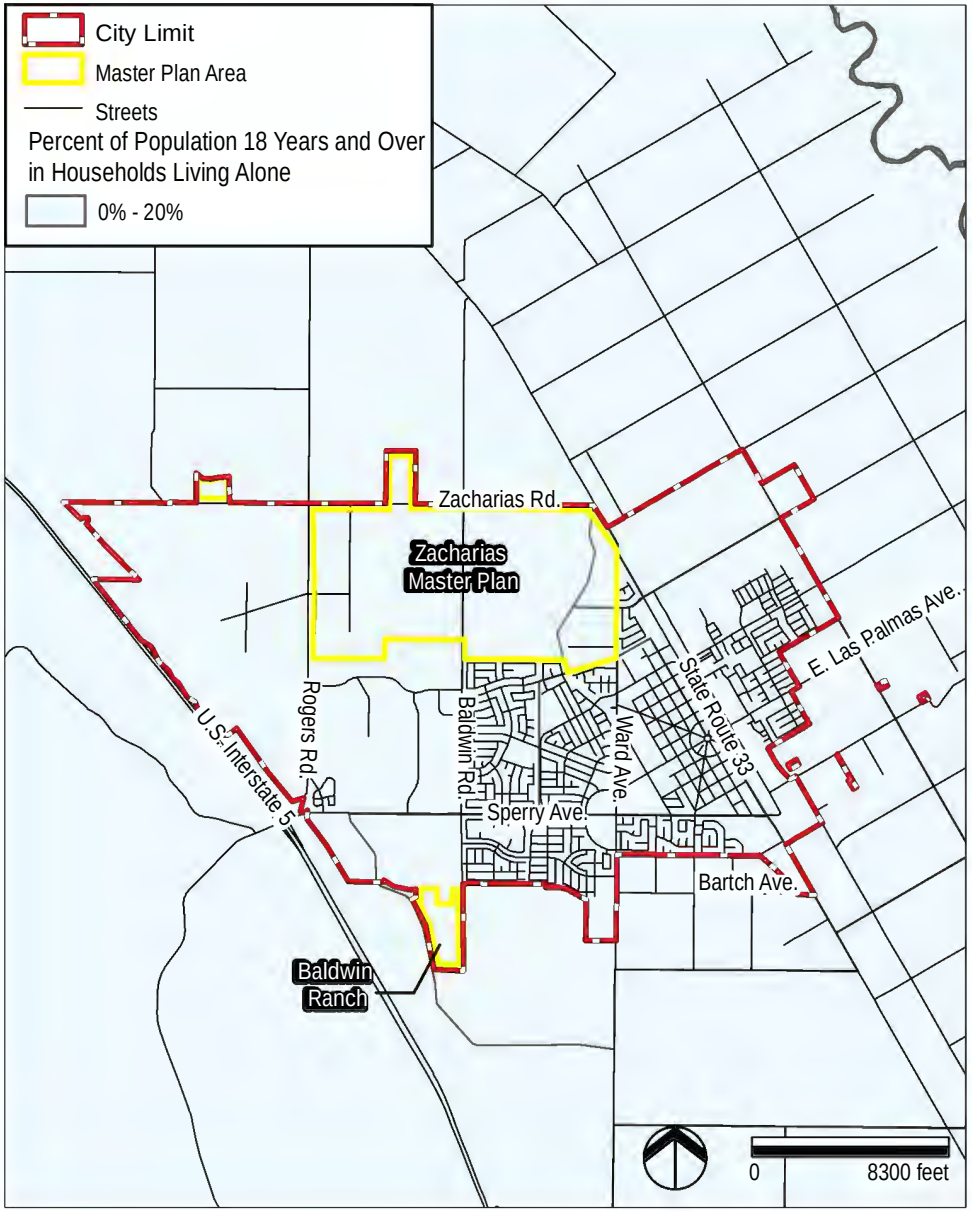
[10] U.S. Code sections 3601, et seq., the Fair Housing Act.
[11] U.S. Department of Housing and Urban Development.
[12] U.S. Department of Housing and Urban Development. "Annual Report on Fair Housing FY 2017."

Regional and Local Trends

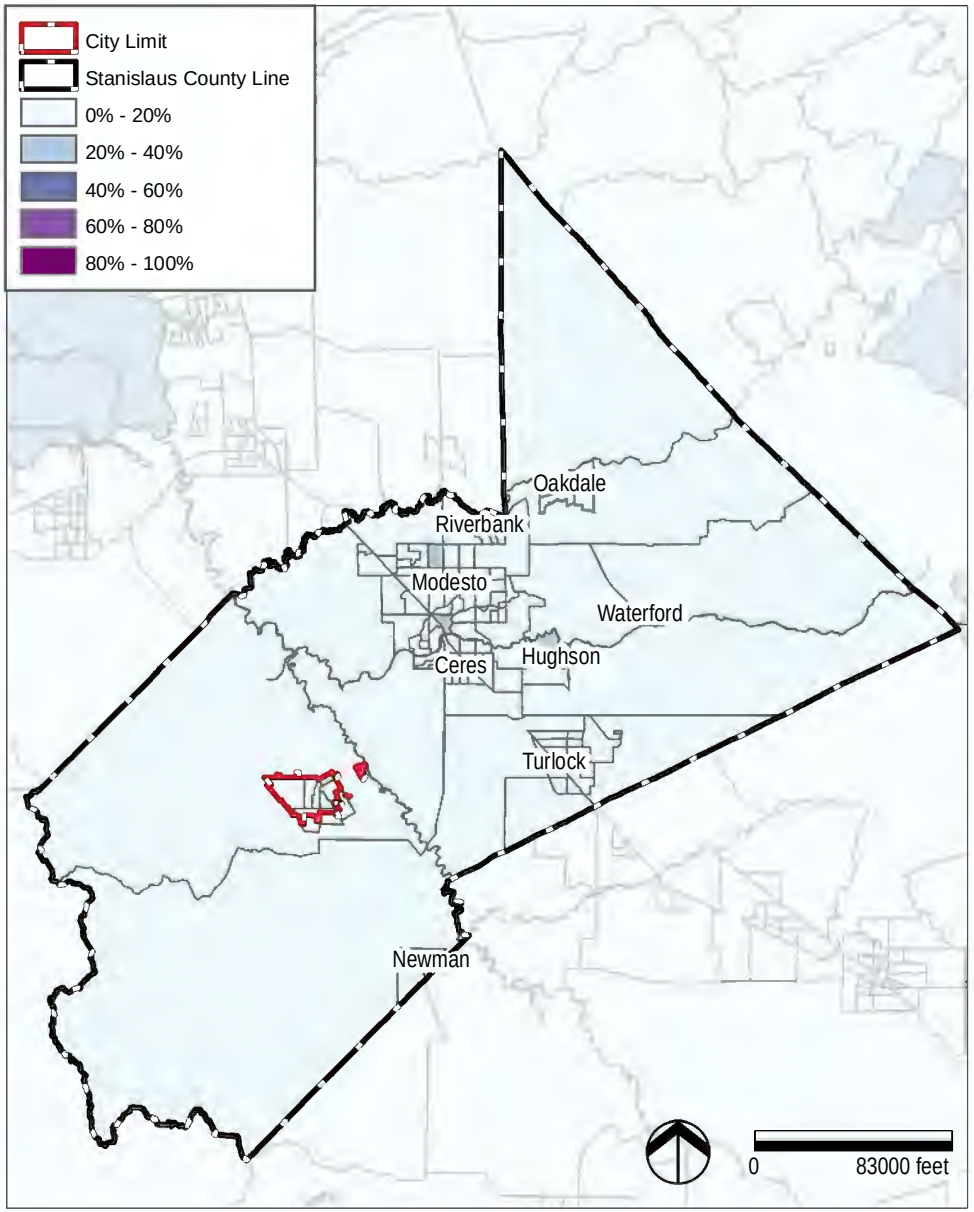
Figure A-5 illustrates the percentage of adults in households living alone in Stanislaus County and Patterson. In Stanislaus County, the percentage of adults living alone (18 years and over) varies slightly. Most jurisdictions in the county have populations of adults living alone that are less than 20 percent. Areas in the cities of Modesto and Hughson are the only exceptions, with concentrations ranging from 20 percent up to 40 percent. In Patterson, the percentage of adults living alone is below 20 percent. The northwest quadrant of the city has the lowest percentage, at 1.8 percent. Conversely, the northeast quadrant of Patterson, between Ward Avenue and State Route 33, has the highest percentage, with 16.9 percent of adults living alone. This area coincides with a highest resource designation, lower poverty rates, lower population of individuals with disabilities, and lower median income ($55,000 to $90,100).

Figure A-6 illustrates the percentage of children in single, female-headed household households in Stanislaus County and Patterson. In Stanislaus County, the percentage of children in single, female-headed households varies geographically, ranging from less than 20 percent to as high as 60 percent. Most jurisdictions in the county have percentages between 20 percent and 40 percent. Higher concentrations, ranging from 40 percent to 60 percent, are less common and primarily found in larger cities such as Modesto, Ceres, Hughson, and Turlock.

In Patterson, the percentage of children in single, female-headed households is below 20 percent. The northwest quadrant of Patterson, between Baldwin Road and Ward Avenue, has the lowest percentage, with only 1 percent of children living in single, female-headed households. Conversely, the northeast and southeast quadrants of the city have the highest percentage, at 16.2 percent. This area also coincides with higher rates of individuals living with disabilities (14.6 percent), poverty (16.2 percent), and lower median incomes ($55,000 to $90,100). This indicates that in Patterson, the areas with higher percentages of children in single, female-headed households also tend to experience higher rates of poverty, disability, and lower median incomes. Specifically, the northeast and southeast quadrants, where 16.2 percent of children live in single, female-headed households, are also the areas with elevated levels of socioeconomic challenges. This correlation suggests that these regions may face significant barriers to economic mobility and access to resources, highlighting the need for targeted support and interventions to address these interconnected issues.



Note: Satellite parcel to the northwest is a part of Zacharias MP Area

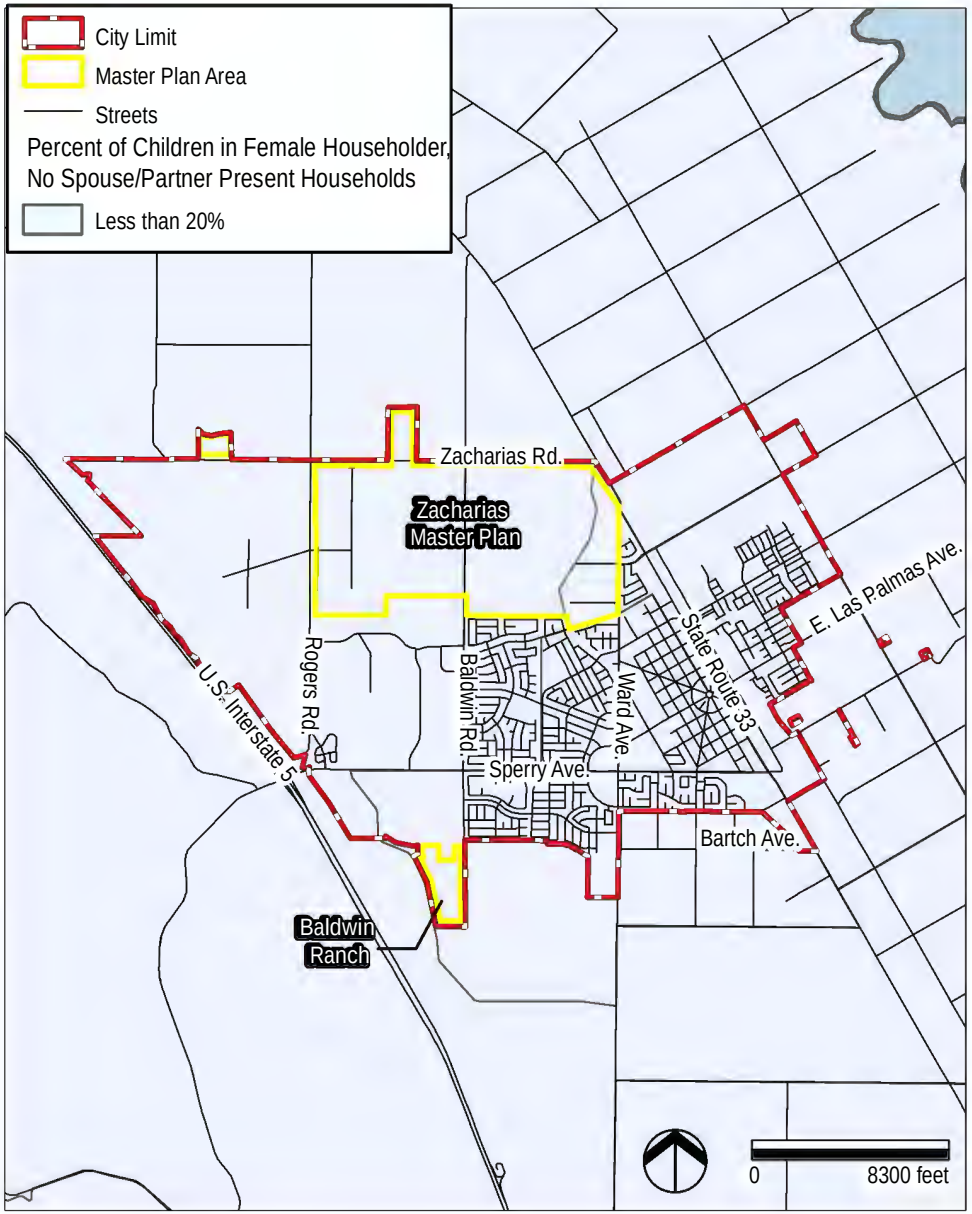


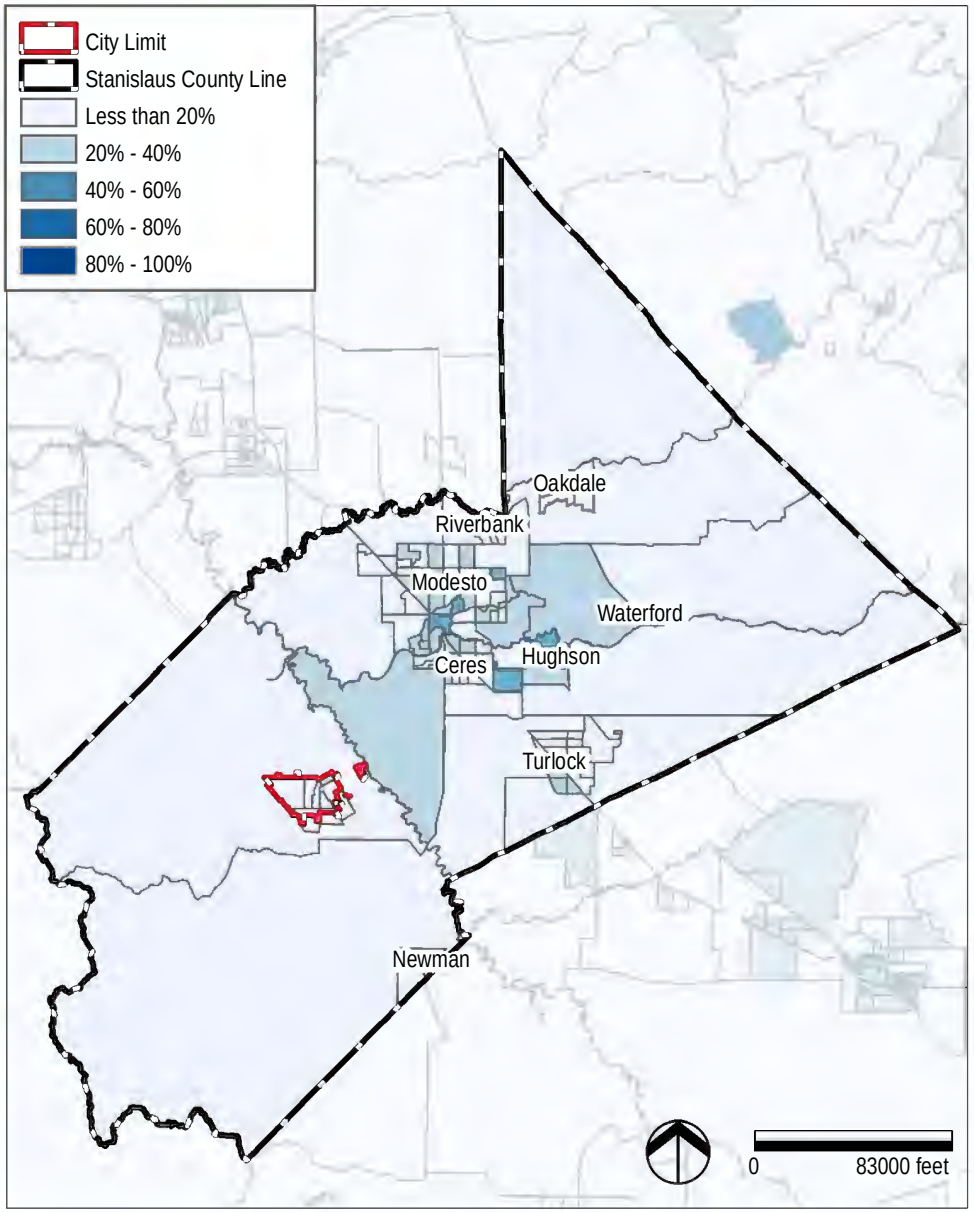
Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-5

Adults in Households Living Alone

City of Patterson 6th Cycle Housing Element





Note: Satellite parcel to the northwest is a part of Zacharias MP Area

Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-6

Female Headed Households with Children, No Spouse/Partner

City of Patterson 6th Cycle Housing Element

Localized Perspective

The City suspects that a possible reason for a larger concentration of single-female households within the northeast quadrant of the city is due to a higher concentration of subsidized housing in the area. According to the California Housing Partnership, there are five state and federally subsidized housing developments in the city providing a total of 254 deed-restricted affordable units, of which four are located in the northeast quadrant of the city. Additionally, the California Department of Social Services Care Facility Search reports there are two licensed childcare facilities in Patterson, one of which is located in the northeast quadrant of the city where percentages of single, female-headed households are higher. However, there do not appear to be any concentrations of childcare facilities in the city.

There is no other localized data identifying contributing factors nor are there any factors indicating that there is a significant detrimental effect to the residents of the city. To mitigate impediments to fair housing related to single-parent households, the City is committed to providing a list of affordable housing locations and contact information on their website that include housing for protected status households (Program 5.2, Chapter 3). Additional resources available to assist single-parent households in Patterson are listed in Chapter 1.

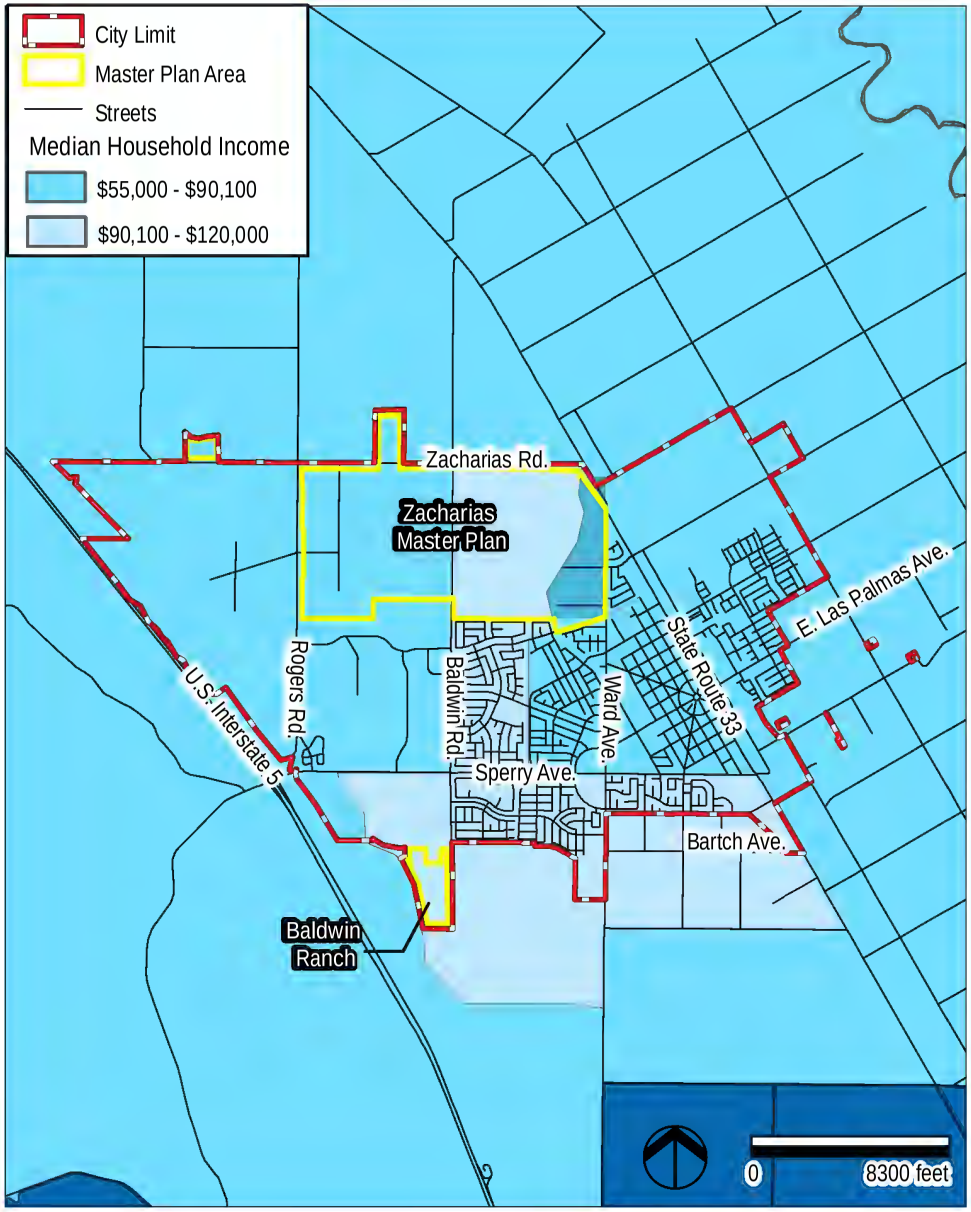
Household Income & Poverty Status

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the area median income or AMI). Household income is directly connected to the ability to afford housing. Higher-income households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of their income for housing, and they are more likely to occupy structurally unsound and overcrowded housing.

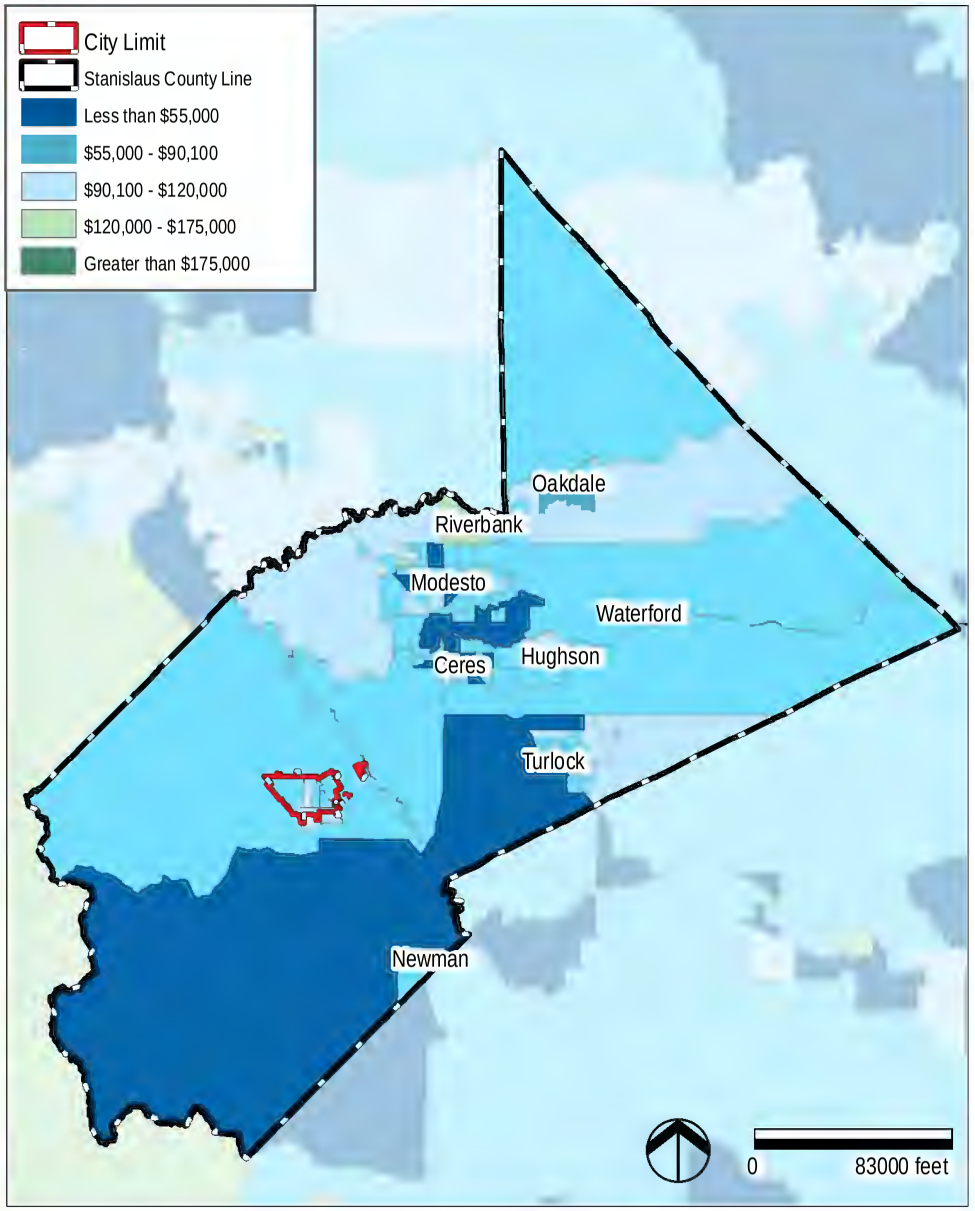
Regional and Local Trends

Figure A-7 illustrates median household income in Stanislaus County and Patterson in 2021. In 2021, the Stanislaus County Area Median Income (AMI) was $70,700. Median household income across the county varies geographically, ranging from less than $55,000 to more than $175,000. Most households earn between $55,000 and $90,100. Households earning between $90,100 and $120,000 are mainly concentrated in Oakdale, Modesto, Hughson, Turlock, and Patterson, while Riverbank and Modesto are the only cities with significant concentrations of households earning over $175,000.

In Patterson, median household income ranges from $55,000 to $120,000. Figure A-6 indicates that the northeast and southeast quadrants of Patterson have the lowest median household incomes, between $60,461 and $83,531. A portion of the northwest quadrant, between Rogers Road and Baldwin Road, also has a lower median income of $81,895. In contrast, households in the northwest quadrant between Baldwin Road and American Eagle Avenue earn around $94,100, and those in the southwest quadrant have the highest median income at $104,783.



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-7

Median Household Income

City of Patterson 6th Cycle Housing Element

Figure A-8 illustrates the percentage of the population whose income is below the poverty level in Stanislaus County and Patterson in 2021. In Stanislaus County, the percentage of the population living below the poverty level varies geographically, ranging from less than 10 percent to over 40 percent. The cities of Riverbank, Oakdale, Hughson, and Patterson have the lowest percentages of residents living in poverty. In contrast, poverty concentrations are highest in Modesto and Turlock, with some areas exceeding 40 percent.

In Patterson, most of the population has a poverty rate of less than 10 percent. However, the eastern quadrants of the city have a concentrated poverty rate of 16.2 percent, which aligns with a higher percentage of individuals with disabilities, a higher percentage of single-parent households, and lower median income.

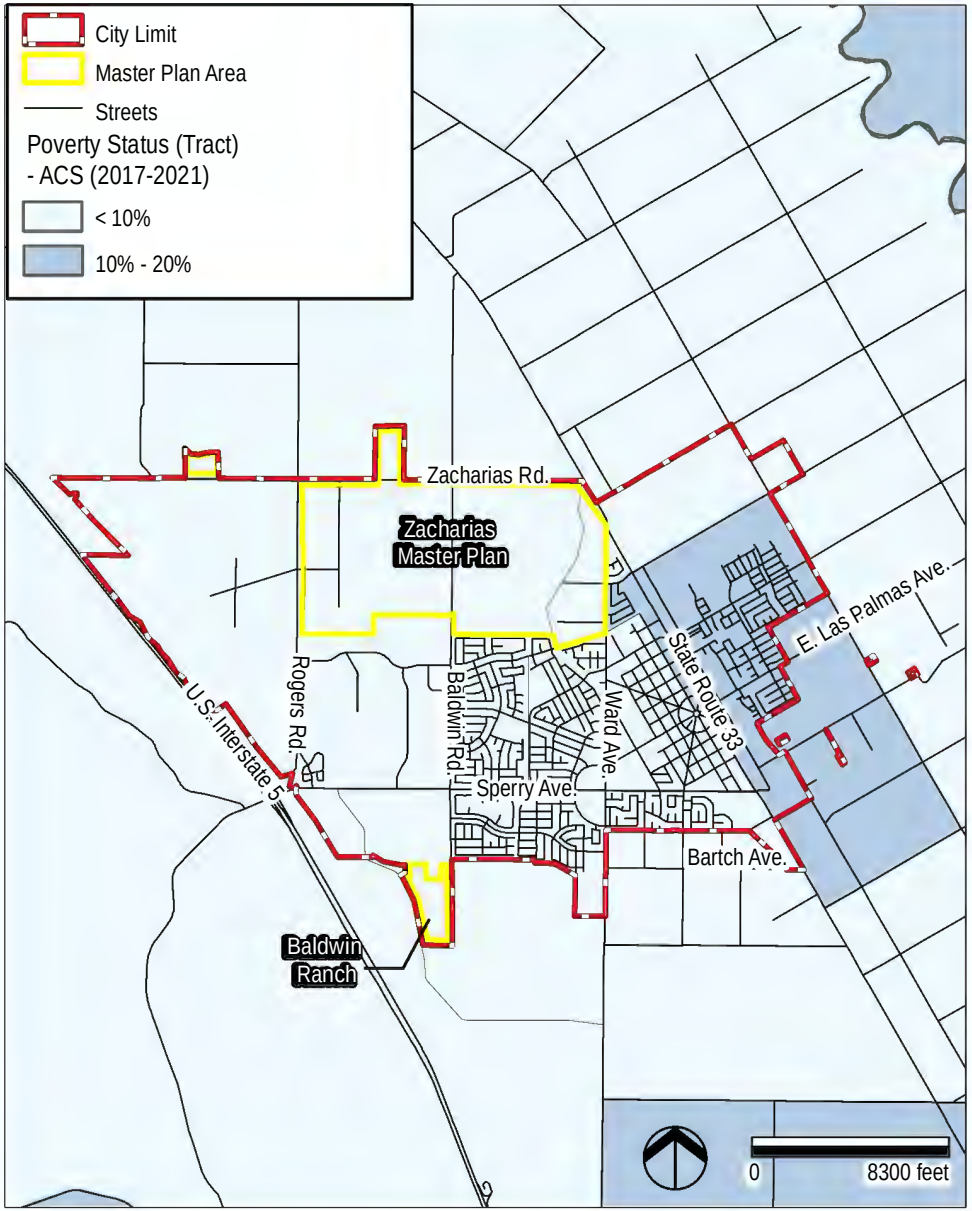
As previously discussed, the eastern quadrants of Patterson, which have the lowest median household incomes, are also areas with higher concentrations of individuals with disabilities, elevated poverty rates, and higher percentages of single-parent households. This suggests that households in these areas are likely facing multiple socioeconomic challenges, which could lead to increased vulnerability and limited access to opportunities. The combination of these factors highlights the need for targeted interventions and resources to address the disparities in these regions.

Local Perspective

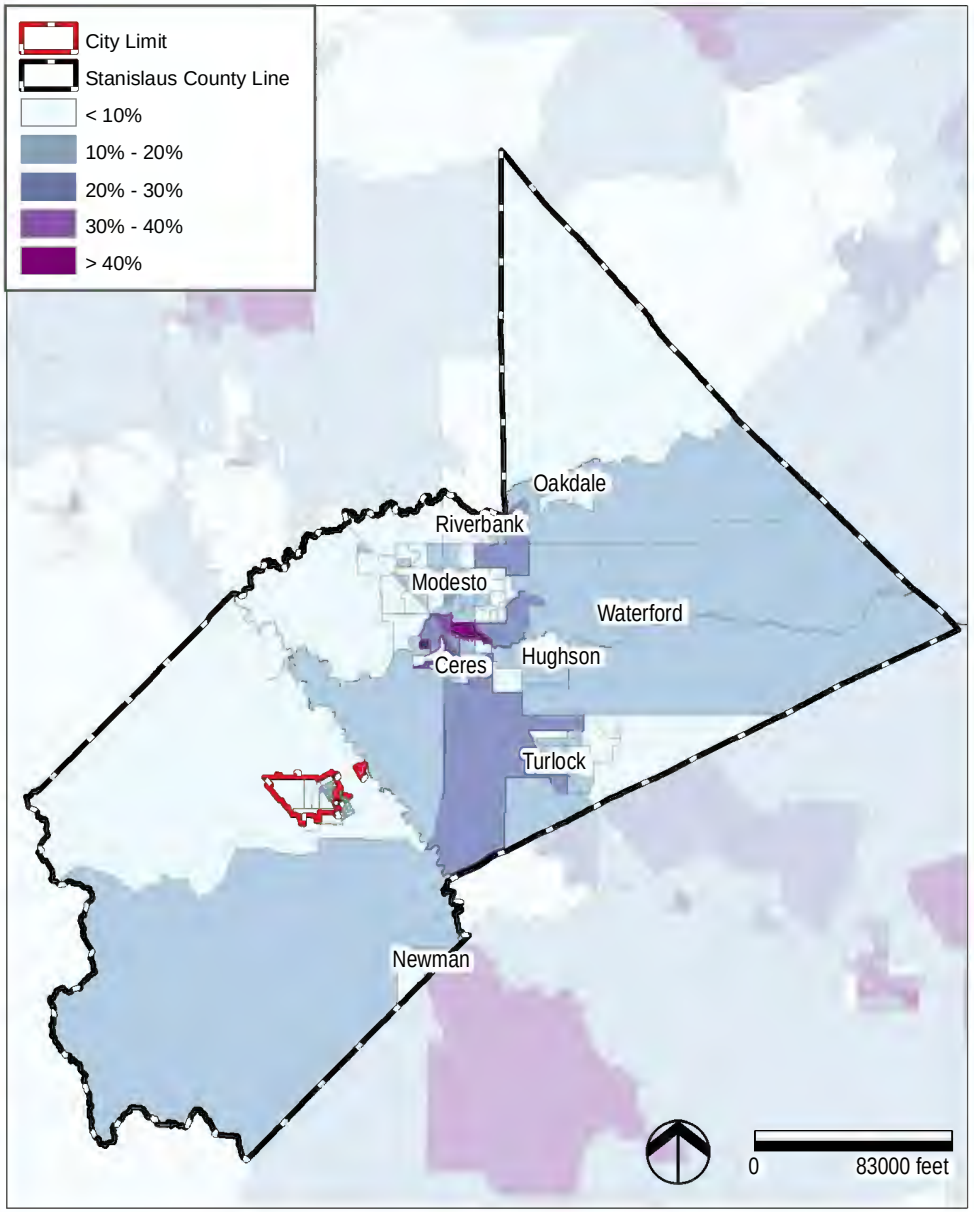
As previously discussed, the City has a total of 254 state and federally subsidized deed-restricted affordable housing units, with 215 of these units located in the eastern quadrants of the city. According to the HCD AFFH Data Viewer, approximately 2.5 percent of renter-occupied households use Housing Choice Vouchers (HCV), but this data is reported for the central region of the city, between Baldwin Road and State Route 33, where median household income is higher. Data for the eastern quadrants of the city, where income levels are lower, is not reported. The City suspects that one possible reason for a concentration of lower median household income within the eastern quadrants of the city is due to a higher concentration of subsidized housing in the area.

As discussed in Chapter 1, Housing Needs and Governmental and Non-Governmental Constraints Assessment, Patterson residents are primarily employed in educational services, healthcare, and social assistance (20 percent), followed by construction (15 percent), retail trade (13 percent), manufacturing (11 percent), and arts, entertainment, and recreation, and accommodation and food services (8 percent). According to the Bureau of Labor Statistics' "Usual Weekly Earnings of Wage and Salary Workers" report for the second quarter of 2024,[13] the median weekly earnings for full-time wage and salary workers were $1,143, equating to an annual income of $59,436. This figure is approximately $33,164 below the 2024 median household income for Stanislaus County ($92,600)[14] and about $26,595 below the 2022 median household income for Patterson ($86,031).[15]

[13] https://www.bls.gov/news.release/pdf/wkyeng.pdf
[14] https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2024.pdf
[15] U.S. Census Bureau, ACS 5-Year Estimate, Table S1901, 2022



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-8

Poverty Status

City of Patterson 6th Cycle Housing Element

A significant portion of Patterson's workforce is employed in construction, retail trade, manufacturing, and arts, entertainment, recreation, accommodation, and food services (totaling 47 percent). This employment distribution likely contributes to the city's lower income levels and higher poverty rates. The City of Patterson acknowledges that improving incomes is largely dependent on access to better-paying jobs and the necessary education to qualify for those jobs. Workforce education and business attraction and retention are crucial to boosting incomes for Patterson residents. The City has actively worked to enhance educational skill sets, particularly among special needs groups such as individuals experiencing homelessness. As discussed in Chapter 1, Patterson developed a partnership with the Helping Others Sleep Tonight (HOST) House in 2012, which has since expanded to include educational workforce programs to help homeless residents gain the skills needed to enter the workforce while also providing essential shelter assistance.

The City demonstrates a strong commitment to the wellbeing of its residents and their success in the workforce, which is closely linked to securing adequate housing and financial stability. To further support residents in acquiring the education and skills necessary for better-paying jobs, the City is committed to collaborating with the Chamber of Commerce and community-based partners. This collaboration will focus on expanding job opportunities in Patterson, offering job readiness training and resume/interview assistance, and encouraging local employers to identify well-paying entry-level positions that can be advertised to Below Market Rate (BMR) tenants. The City also plans to market these positions to BMR tenants and property managers of buildings with BMR residents. Program 5.9 outlines this strategy, including the schedule of actions, associated metrics, and timelines for completion (see Chapter 3).

A.6 Concentrated Areas of Poverty and Segregation

Racially and Ethnically Concentrated Areas of Poverty

To help communities identify racially and ethnically concentrated areas of poverty (R/ECAP), HUD uses a definition based on two criteria: a racial/ethnic concentration threshold and a poverty test. In metropolitan or micropolitan areas, an area is considered to have a racial and ethnic concentration if 50 percent or more of the population is non-white. In non-metropolitan areas, where non-White populations are typically smaller, the threshold is 20 percent. The poverty test defines "extreme poverty" as areas where 40 percent or more of the population lives at or below the federal poverty line, or where the poverty rate is three times the metropolitan area's average, whichever is lower. An area that meets both the racial/ethnic concentration threshold and the poverty test is classified as a R/ECAP.[16]

[16] HCD. April 2021. AFFH Guidance for all Public Entities and for Housing Elements. https://www.hcd.ca.gov/community- development/affh/docs/affh_document_final_4-27-2021.pdf

Regional and Local Trends

Figure A-9 illustrate R/ECAPs in Stanislaus County and Patterson. According to HUD data from 2009-2013, there are four R/ECAPs (Racially/Ethnically Concentrated Areas of Poverty) in Stanislaus County. Three of these R/ECAPs overlap with the Airport, Rouse, and Bret Harte census designated places (CDP), which correspond to the areas where a significant portion of the population earns an income below the poverty level. In the Airport and Bret Harte areas, 30 to 40 percent of the population falls below the poverty line. All four R/ECAPs in the county consist of unincorporated islands substantially surrounded by the city of Modesto. These census tracts are predominantly Hispanic/Latino, with over 81 percent of residents identifying as non-white. According to the Stanislaus County Draft 6th Cycle Housing Element, public feedback indicates that these areas have consistently lacked public investment, including sewer connections, stormwater improvements, sidewalks, and street lighting.

There are no areas within the City of Patterson identified as R/ECAPs nor are there any within the immediate vicinity of the city that could be affected by actions taken by the City. While there are no R/ECAPs identified in Patterson, the eastern quadrant of the city has higher rates of poverty (16.2 percent). This is discussed in detail in Section 4.5, Household Income and Poverty Status above.

Racially Concentrated Areas of Affluence

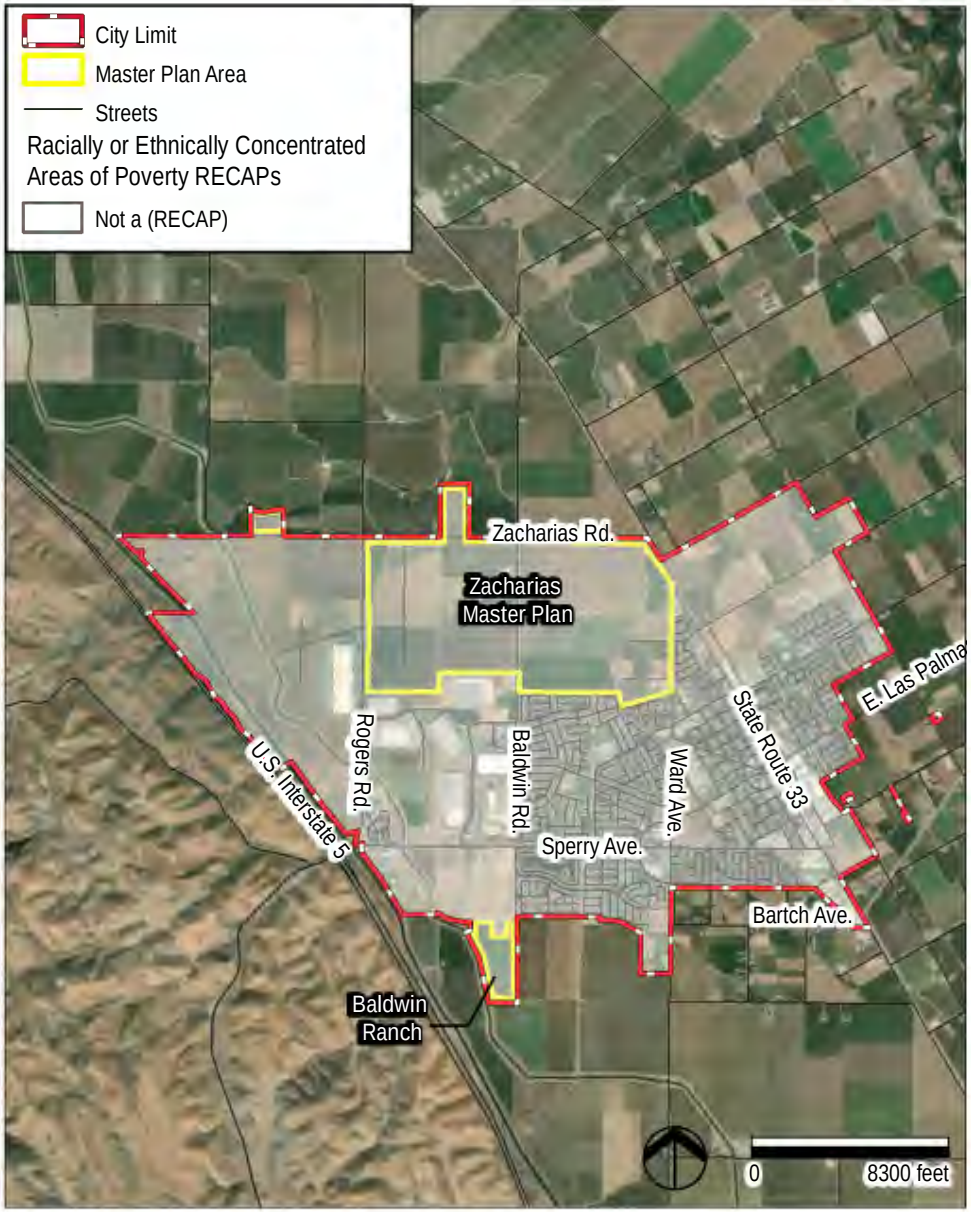
Racially or Ethnically Concentrated Areas of Affluence (RCAAs) are neighborhoods in which there are both high concentrations of non-Hispanic White households and high household income rates. Based on research from the University of Minnesota Humphrey School of Public Affairs, RCAAs are defined as census tracts where 80 percent or more of the population is White, and the median household income is $125,000 or greater (which is slightly more than double the national median household income in 2016).[17] HCD further adjusted the RCAA methodology to track more closely with California's higher levels of diversity by setting the white population threshold to 50 percent.

Regional and Local Trends

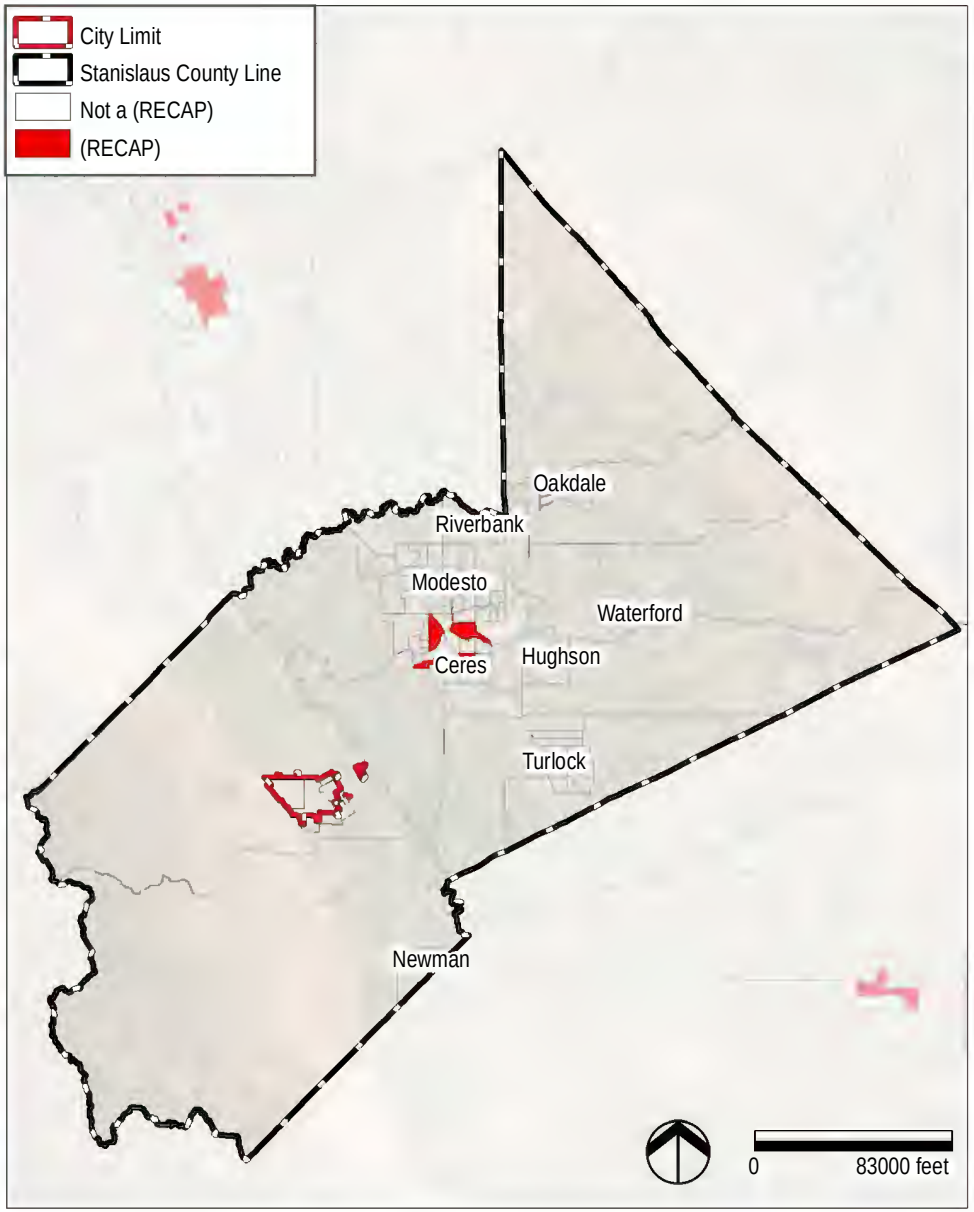
Figure A-10 illustrates RCAAs in Stanislaus County and Patterson in 2019. As shown, there are two concentrated RCAAs in Stanislaus County: one in the northeastern part of the county, encompassing the CDPs of East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, and another in and around Denair. Each RCAA overlaps with areas of highest/high resource opportunity and is situated far from job centers.

There are no areas within the City of Patterson identified as RCAAs nor are there any within the immediate vicinity of the city that could be affected by actions taken by the City.

[17] HCD. April 2021. AFFH Guidance for all Public Entities and for Housing Elements. https://www.hcd.ca.gov/community- development/affh/docs/affh_document_final_4-27-2021.pdf



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

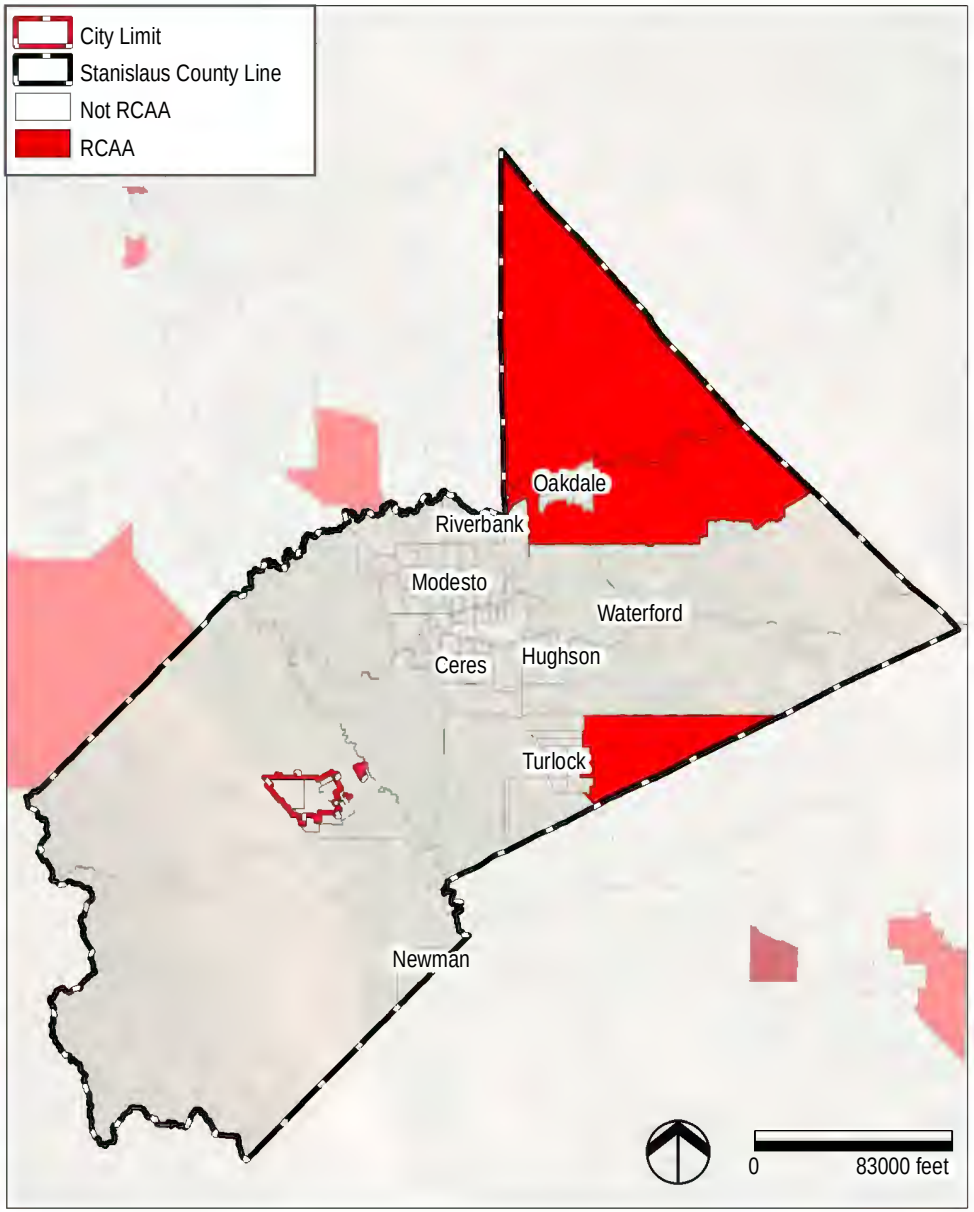
Figure A-9

Racially or Ethnically Concentrated Areas of Poverty

City of Patterson 6th Cycle Housing Element



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024,
California HCD 2024

Figure A-10

Racially Concentrated Areas of Affluence

City of Patterson 6th Cycle Housing Element

A.7 Disparities in Access to Opportunities

TCAC Opportunity Areas

Since 2017, the Tax Credit Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed annual "opportunity maps" to assess access to resources such as high-paying jobs, quality schools, and safe neighborhoods. These maps provide evidence-based research to support policy recommendations and are available to all jurisdictions.

The TCAC/HCD Opportunity Maps identify areas with varying levels of access to opportunity within a community. This information highlights the need for housing policies that address conditions in low-resource areas and areas with high segregation and poverty while promoting access to high-resource areas for lower-income households and communities of color. TCAC/HCD categorizes census tracts as high-, moderate-, or low-resource areas based on factors like school proficiency, median income, and housing prices, which influence poverty and segregation. The 2022 Opportunity Maps compare each tract within its council of governments (COG) region.

"Highest resource" areas represent the top 20 percent of census tracts in the region, offering the best outcomes in health, economic opportunities, and education. "High resource" areas rank in the 21st to 40th percentiles, providing strong but slightly lower access to positive outcomes.

"Moderate resource" areas fall within the next 30 percent, offering mixed or improving outcomes in health, economics, and education. "Moderate resource (rapidly changing)" areas show rapid improvements in key indicators like income and job opportunities.

"Low-resource" areas are in the bottom 30 percent, indicating limited access to positive outcomes. Areas labeled "high segregation and poverty" have a significant overrepresentation of people of color and at least 30 percent of the population living below the federal poverty line ($19,720 for a two-person household and $30,000 for a family of four in 2023).

Regional and Local Trends

Figure A-11 illustrates TCAC opportunity area composite scores in Stanislaus County and Patterson. In Stanislaus County, the TCAC opportunity area composite score varies widely. Low-resource areas are concentrated in the central county CDPs of South Modesto, Empire, and Crows Landing. Moderate-resource areas are in the southwestern CDPs of Westley, Grayson, and parts of Salida, including a portion of the City of Patterson. High-resource areas include northern Salida, Keyes, Denair, and Patterson. The highest resource areas are scattered throughout the county, particularly in the northwestern CDPs of East Oakdale, Orange Blossom, Knights Ferry, Valley Home, and Hickman. In contrast, the CDPs of Airport and Bystrom exhibit high segregation and poverty. Access to opportunity, based on composite scores of economic, educational, and environmental

factors, varies significantly across the county. Areas with high segregation, poverty, and low resources, particularly in the southwestern and central regions, overlap with predominantly Hispanic/Latino populations and areas with lower median household incomes and higher poverty rates.

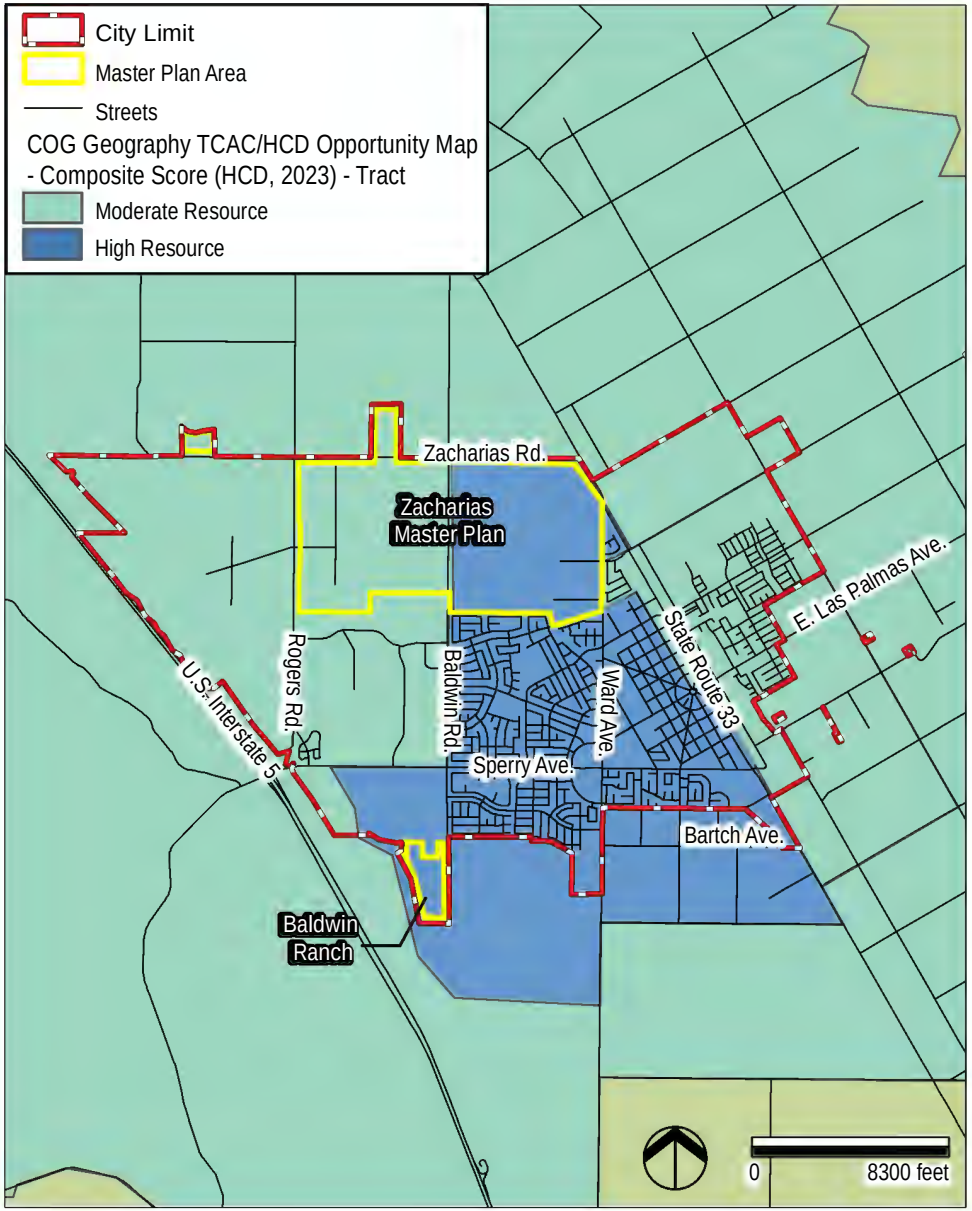
In Patterson, most of the city is designated as a high-resource area, with some areas classified as moderate-resource. As shown in Figure A-11, high-resource areas are located in both the western and eastern parts of the city, primarily bordered by Baldwin Road and State Route 33. Moderate-resource areas are found west of Baldwin Road and north of Sperry Avenue, as well as east of State Route 33.

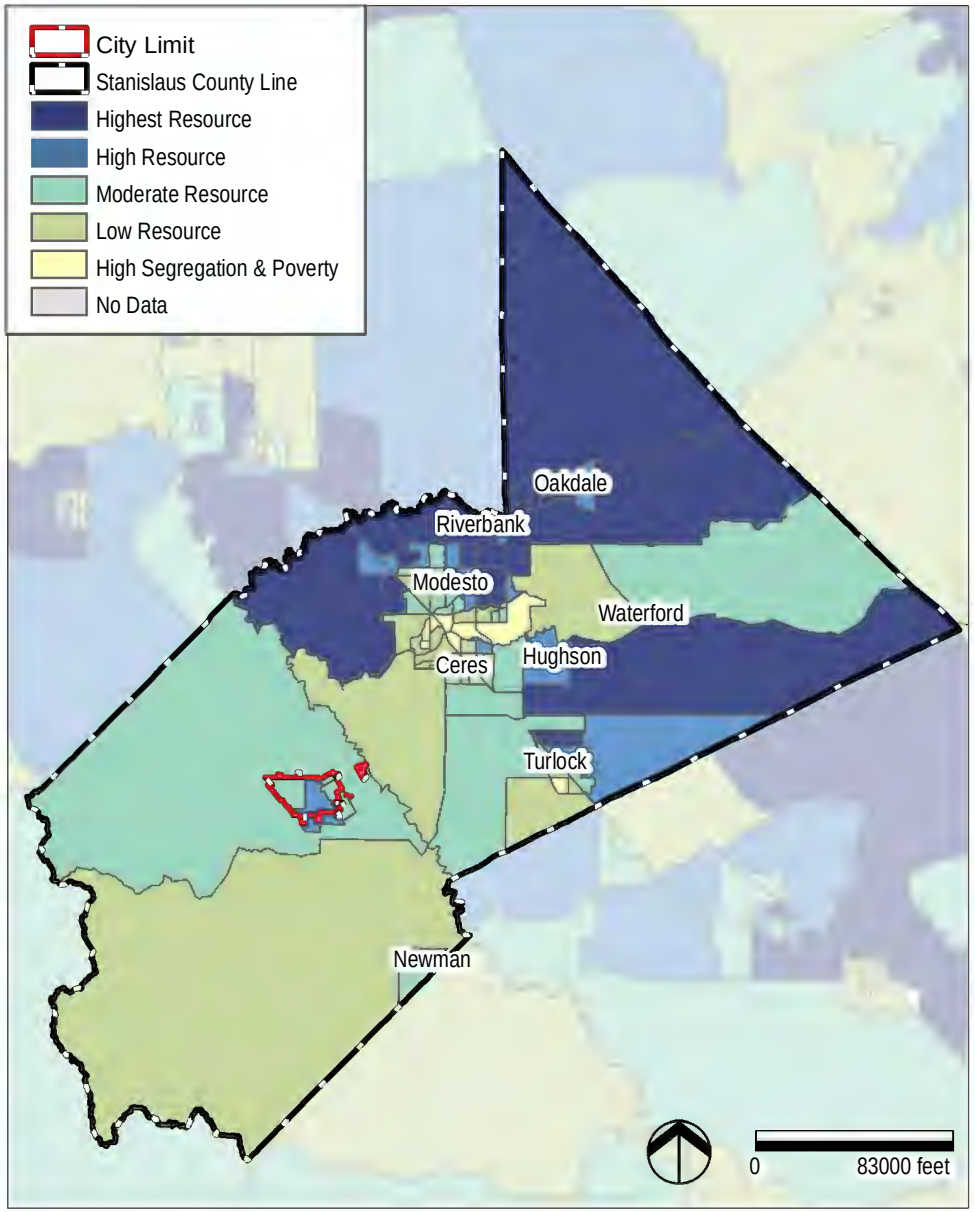
Areas located west of Baldwin Road and outside of the Zacharias Master Plan Area are primarily zoned for industrial uses, do not permit residential development, and are situated farther from public services, transportation, and other key amenities. These factors contribute to the area's designation as a moderate resource area. These moderate-resource areas coincide with lower median household incomes ($55,000 to $90,100) and, specifically in the area east of State Route 33, higher poverty rates (16.2 percent).

In contrast, the City's new master planned areas—the Zacharias Master Plan Area (located in the northern part of the city between Baldwin Road and Ward Avenue) and the Baldwin Ranch South Master Plan Area (located south of Sperry Avenue, between Baldwin Road and Rogers Road)—are both designated as high resource areas. Although these master planned areas are currently undeveloped, they are adjacent to established neighborhoods that contain a mix of residential and commercial uses and offer better access to schools, employment opportunities, public services, and transit. These high-resource areas correspond to higher median household incomes ($90,100 to $120,000) and lower poverty rates (averaging 3.5 percent).

Older residential neighborhoods are primarily located east of State Route 33, as well as within the downtown core, just west of State Route 33. These areas feature a blend of residential and commercial uses but are generally characterized by aging infrastructure, older housing stock, lower household incomes, and higher rates of housing-related problems.

Together, these conditions highlight the importance of prioritizing new affordable residential development in high-resource areas while also investing in the revitalization of older neighborhoods to promote equitable access to housing, infrastructure, and community amenities across the city. Striking this balance will ensure existing conditions are mitigated and future imbalances are avoided.





Note: Satellite parcel to the northwest is a part of Zacharias MP Area

Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-11

TCAC Opportunity Areas Composite Score

City of Patterson 6th Cycle Housing Element

Local Perspective

Overall, the city has adequate access to resources. However, as mentioned earlier, limited educational and economic mobility are significant factors affecting the city's TCAC opportunity area composite score. Additionally, challenges in providing sufficient affordable housing impact residents' ability to contribute to the local economy and support their households.

To improve equal access to resources and increase investment potential throughout the City, the City's Capital Projects Division has identified capital improvement projects across the city, focusing on pedestrian improvements such as sidewalks, ADA compliance, and better connectivity between the western, eastern areas, and the downtown core. Notably, the City is leveraging CDBG funds to initiate the Washburn Street/Sidewalk Project, which focuses on repairing and enhancing existing sidewalks in the northeast quadrant of the city. Potable water, sewer, and stormwater projects are also planned for both the western and eastern quadrants. Program 5.7 outlines actions the City will take to improve conditions in the eastern quadrants and revitalize underutilized industrial land in the western quadrants (see Chapter 3).

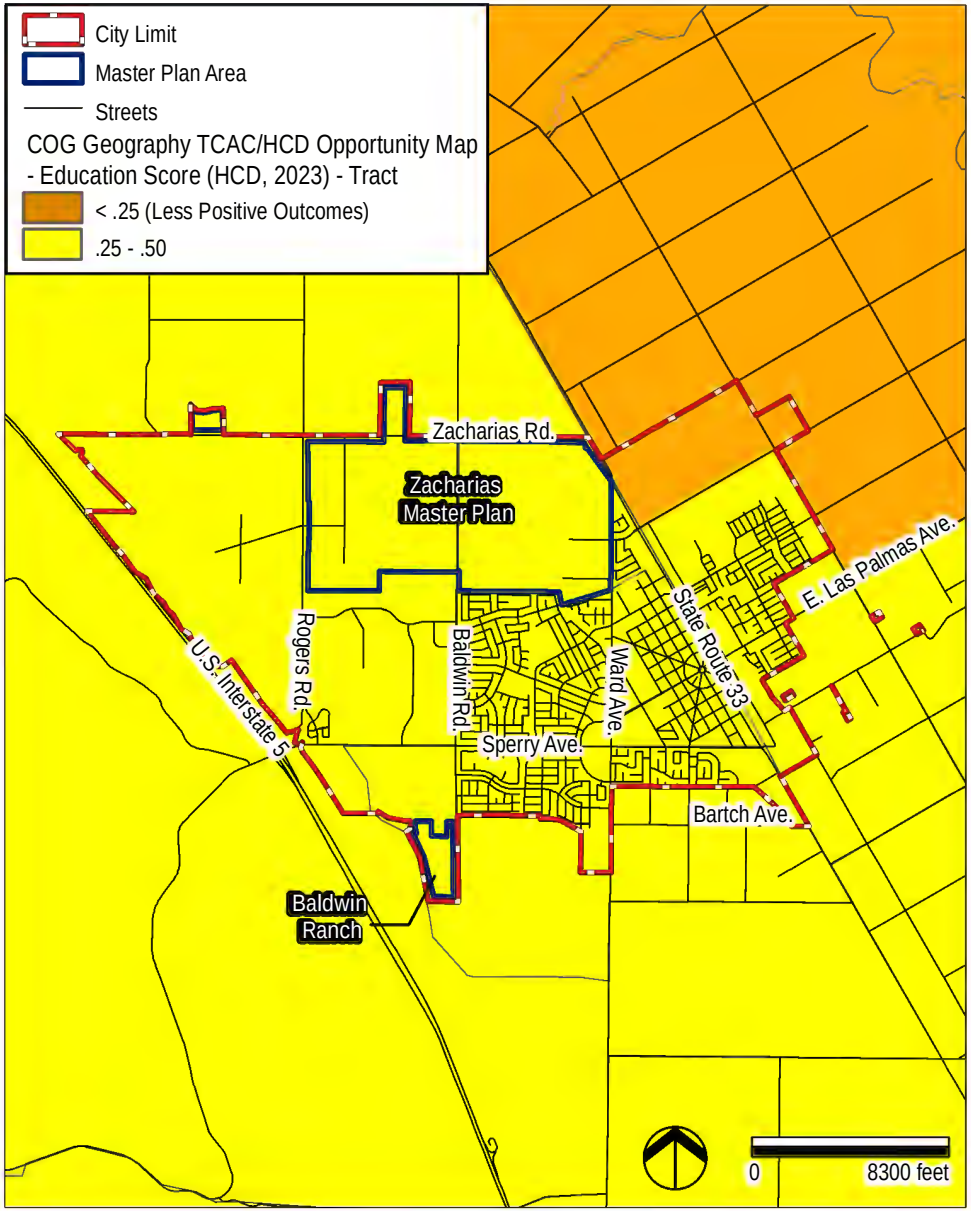
Below is an analysis of each TCAC opportunity area domain, along with the City's focused efforts to improve the overall composite score.

Access to Education

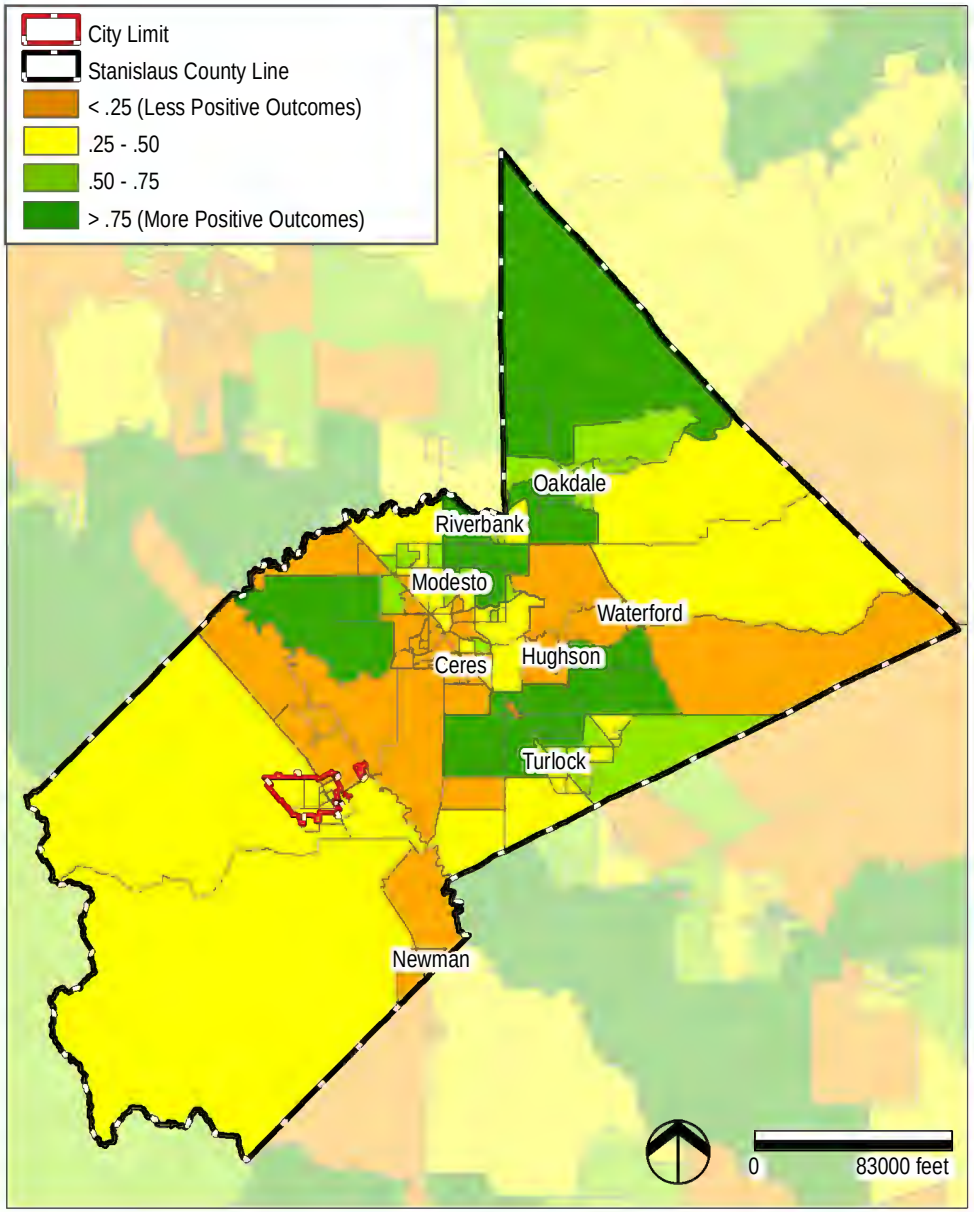
Educational attainment is directly linked to housing opportunities. TCAC education domain scores measure educational outcomes using math and reading proficiency (the percentage of 4th graders who met or exceed math proficiency standards), high school graduation rates (the percentage of high school cohorts that graduate on time) and student poverty indicators (the percent of students not receiving free or reduced-priced lunch). The TCAC education domain scores are derived from 2018-2019 Department of Education data. This analysis incorporates demographic and socio-economic measures to spatially evaluate access to educational opportunities at the census tract level.

Regional and Local Trends

Figure A-12 illustrates TCAC opportunity areas according to education domain in Stanislaus County and Patterson. Stanislaus County shows significant contrasts in access to educational opportunities, posing an impediment to fair housing. Low education scores (<0.25) are concentrated in and around South Modesto's CDPs, Airport, and West Modesto, as shown in Figure A-12. Empire and Salida also have low scores, ranging from 0.25 to 0.5. In contrast, most northeastern and southern areas of the county near Turlock, including CDPs around East Oakdale, Westley, and Crows Landing, score more positively (0.5-0.75). La Grange, Hickman, Keyes, and Denair have the most positive education outcomes (0.75-1). Areas with lower education outcomes often overlap with predominantly Hispanic/Latino populations, higher poverty rates, and a greater percentage of children in female-headed households with no spouse present.



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-12

TCAC Opportunity Areas, Education Domain

City of Patterson 6th Cycle Housing Element

In Patterson, most of the city has low educational scores (0.25-0.50), with some areas having scores of less than 0.25. The lowest educational scores are found east of State Route 33 and north of Olive Avenue, while the areas west of State Route 33 and south of Olive Avenue have slightly higher scores (Figure A-12). The area east of State Route 33 also coincides with lower median household incomes ($55,000 to $90,100), higher poverty rates (16.2 percent), and a higher percentage of residents with disabilities (14.6 percent).

The data findings point to a need for targeted interventions city-wide to address educational disparities, with specific attention to areas east of State Route 33, which are likely linked to the broader economic and social conditions in that area. Improving access to resources and support in these communities could help raise educational outcomes and reduce inequalities across the city.

Local Perspective

According to the California Assessment of Student Performance and Progress, the 2023 graduation rate for the Patterson Joint Unified School District (PJUSD) was 86.5 percent, comparable to the statewide (86.4 percent) and county averages (86.2 percent).[18] The PJUSD consists of nine schools: Northmead Elementary, Apricot Valley Elementary, Walnut Grove Elementary, Grayson Elementary, Las Palmas Elementary, Creekside Middle, Patterson High, Del Puerto High, and Open Valley Independent Study. Only two schools, Walnut Grove Elementary and West Valley Learning Center, are located east of State Route 33, while Del Puerto High and Patterson High are centrally located along Ward Avenue. This distribution may create geographic challenges for lower-income households in accessing schools and is considered a contributing factor to access to education opportunities. Further, the City suspects that one possible reason for a concentration of moderate educational scores within the eastern quadrants of the city is due to a higher concentration of subsidized housing in the area.

The Zacharias Master Plan Area is expected to include two new schools, an elementary and a middle school, enhancing educational opportunities in the northwestern part of the city. However, this development does not address the eastern quadrants, where educational scores are moderate (0.5 to 0.75).

The City acknowledges that city-wide targeted investment, specifically in the eastern quadrant, is necessary to support and expand educational and economic opportunities for residents. As previously mentioned in Chapter 1, Housing Needs and Constraints Assessment, the City and HOST House have partnered in 2017 to offer educational classes for persons experiencing homelessness, aimed at helping participants transform their lives by developing skills, competencies, and work habits that lead to financial self-sufficiency. Educational classes continue to be offered at the HOST House, and since beginning the program, Cambridge Academics Enterprise Centers has

[18] https://caaspp-elpac.ets.org/caaspp/

joined the initiative to create an Enterprise Restart Program. This is a year-long program broken into Phase 1, consisting of a transformative curriculum and work experience, and Phase 2, consisting of work support and training for independent living.

The City will collaborate annually with the PJUSD, HOST House, and interested nonprofit institutions to determine any outside factors that may impede school performance that can be alleviated at the City level. It is intended that through targeted investment and support, educational opportunities will expand in Patterson.

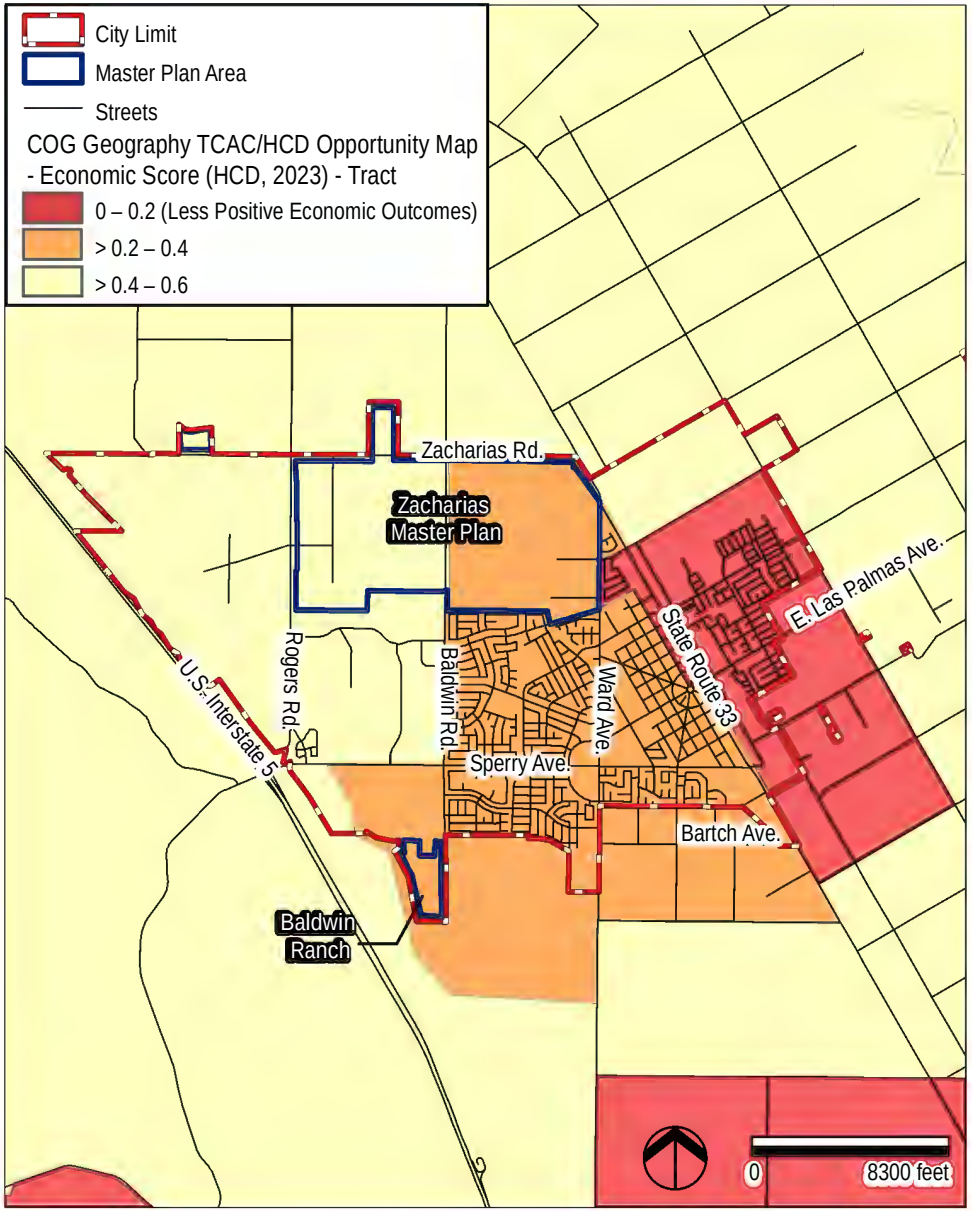
Economic Outcomes

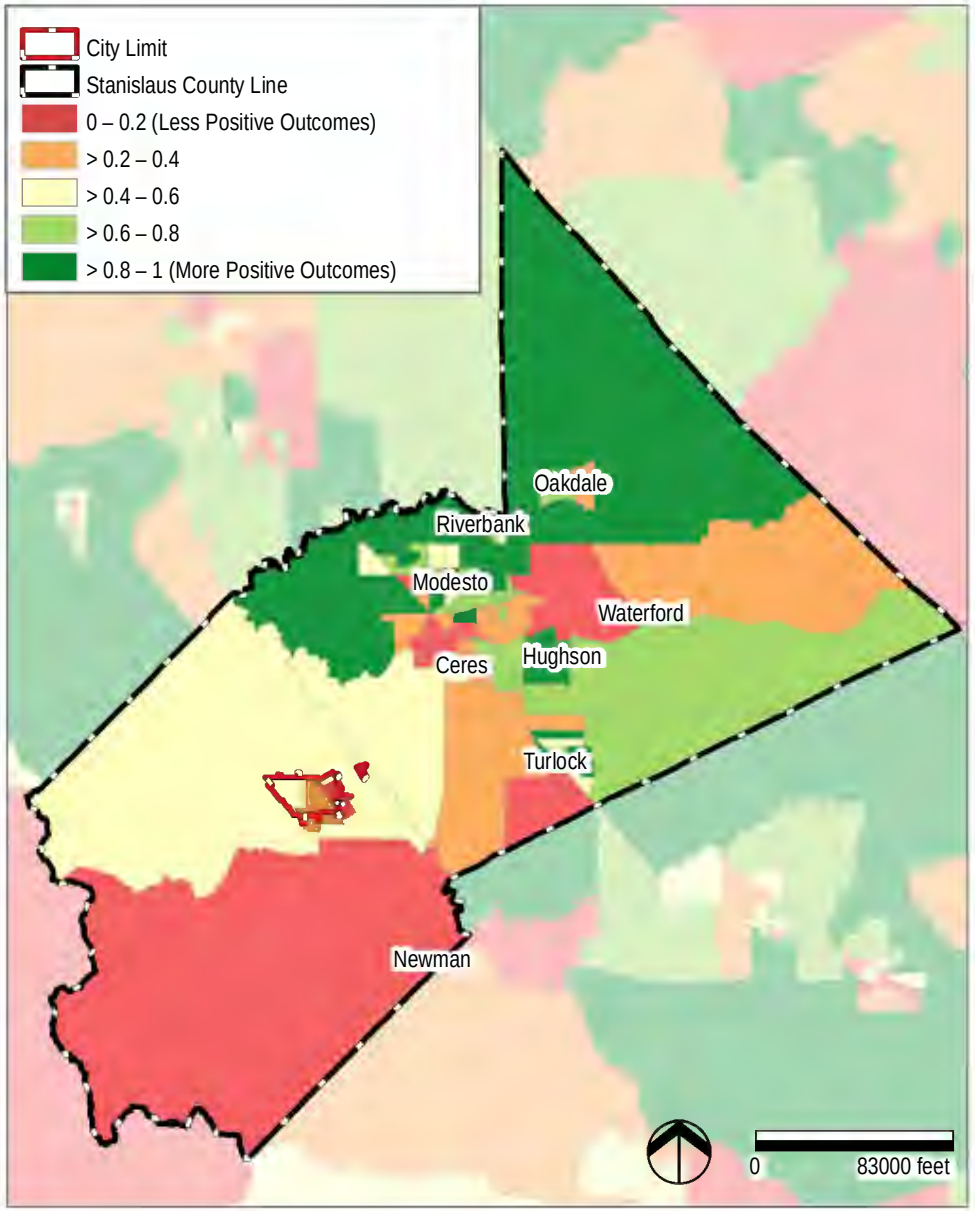
Housing opportunities are closely linked to economic outcomes. Access to high-quality jobs near affordable housing leads to more housing options and shorter commutes. This economic analysis uses TCAC economic indicators, employment participation data from the ACS, and the HUD Jobs Proximity Index. TCAC economic opportunities are assessed by census tract and include factors such as poverty (percent of the population above 200 percent of the federal poverty line), adult education (percent of adults with a bachelor's degree or higher), employment (percent of adults aged 20-64 employed in the civilian labor force or armed forces), job proximity (number of jobs for those with less than a bachelor's degree within a set radius), and median home values. A higher economic index score indicates better economic outcomes. The HUD Jobs Proximity Index measures job accessibility at the census block group level.

Regional and Local Trends

Figure A-13 illustrates TCAC opportunity areas according to economic domain in Stanislaus County and Patterson. Stanislaus County has generally moderate economic opportunity scores and adequate job access, with most areas scoring between 0.25 and 0.75. More positive economic outcomes are found in the northeastern CDPs of East Oakdale, Orange Blossom, Knights Ferry, Valley Home, and Salida. In contrast, less positive outcomes are seen in South Modesto, Empire, and Crows Landing, with similar trends in the surrounding cities. Areas with more positive economic outcomes typically overlap with predominantly white populations and higher median household incomes (above $87,100, the state median). Conversely, areas with less positive outcomes are predominantly Hispanic/Latino and have lower median household incomes (generally under $55,000).

In Patterson, economic scores vary by geography, with some areas scoring low (0.0 to 0.2) and others moderate (>0.4 to 0.6). The highest scores are in the city's outer edges, particularly in the northwestern and northeastern quadrants, while the lowest scores are east of State Route 33. These low-score areas align with lower median household incomes ($55,000 to $90,100), higher poverty rates (16.2 percent), and a higher percentage of residents with disabilities (14.6 percent). The central area of the city, bounded by Baldwin Road and State Route 33, has moderate scores (>0.2 to 0.4). These moderate-score areas are designated as high-resource and correlate with higher median household incomes ($90,100 to $120,000), lower poverty rates, and fewer residents with disabilities.





Note: Satellite parcel to the northwest is a part of Zacharias MP Area

Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-13

TCAC Opportunity Areas, Economic Domain

City of Patterson 6th Cycle Housing Element

The HUD jobs proximity index measures employment accessibility in residential neighborhoods by calculating distances to potential job locations in the area, with larger employment centers weighted more heavily, and factoring in the population size of the local workforce. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

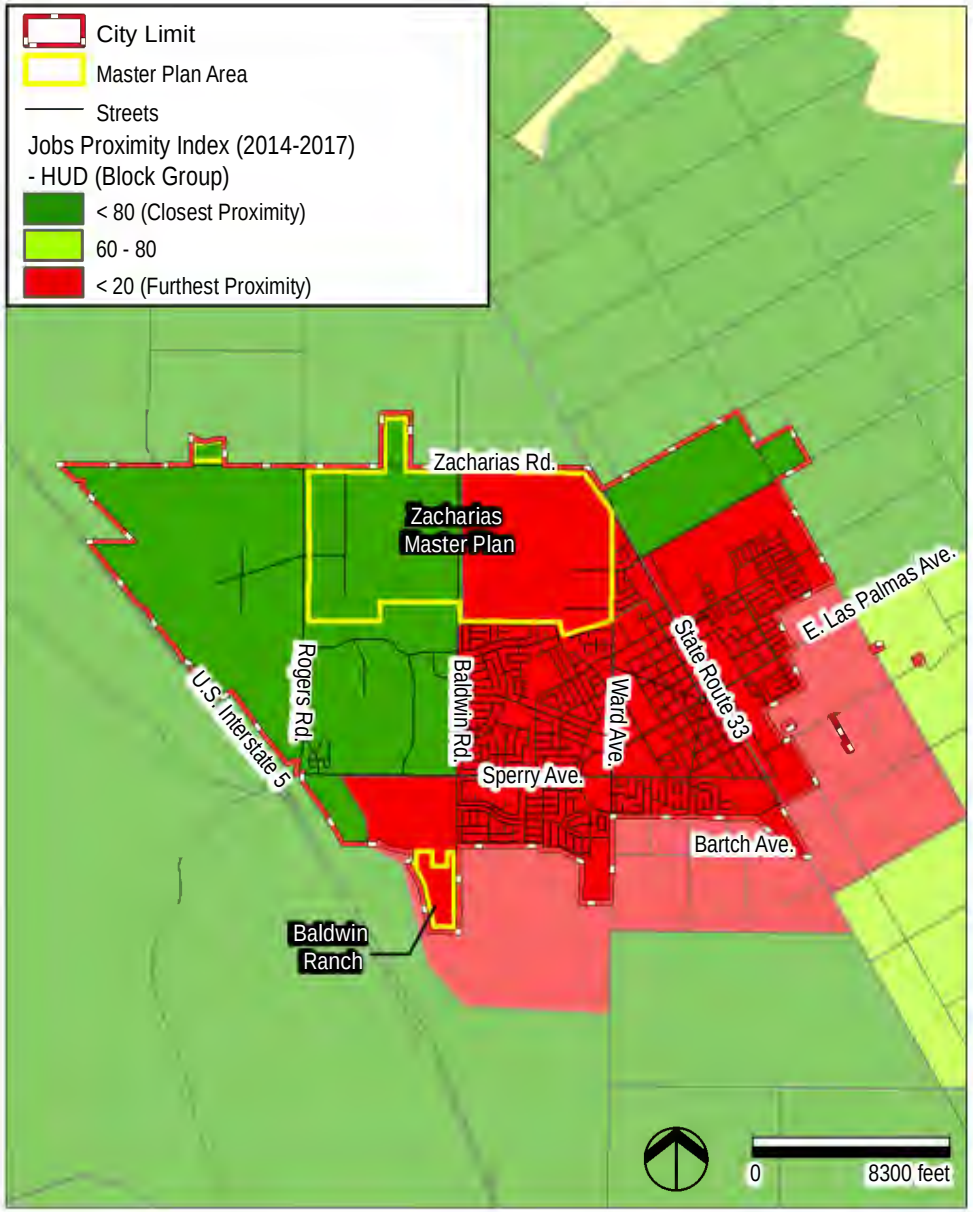
Figure A-14 illustrates the Jobs Proximity Index in Stanislaus County and Patterson. Much of Stanislaus County falls within the middle range (40 to 60) of HUD's Jobs Proximity Index, indicating relatively good access to jobs. There is no clear racial or ethnic disparity in job proximity across the county. The highest job proximity scores are in the CDPs of Diablo Grande and parts of Salida, due to their proximity to employment centers like Modesto, parts of San Joaquin County, and agriculture. Lower job proximity scores are found in CDPs such as Denair, East Oakdale, Orange Blossom, Knights Ferry, and Valley Home, as well as parts of West Modesto and Bret Harte. Interestingly, areas with higher economic scores often overlap with lower job proximity, particularly in rural areas where agricultural job opportunities are more accessible than in city centers.

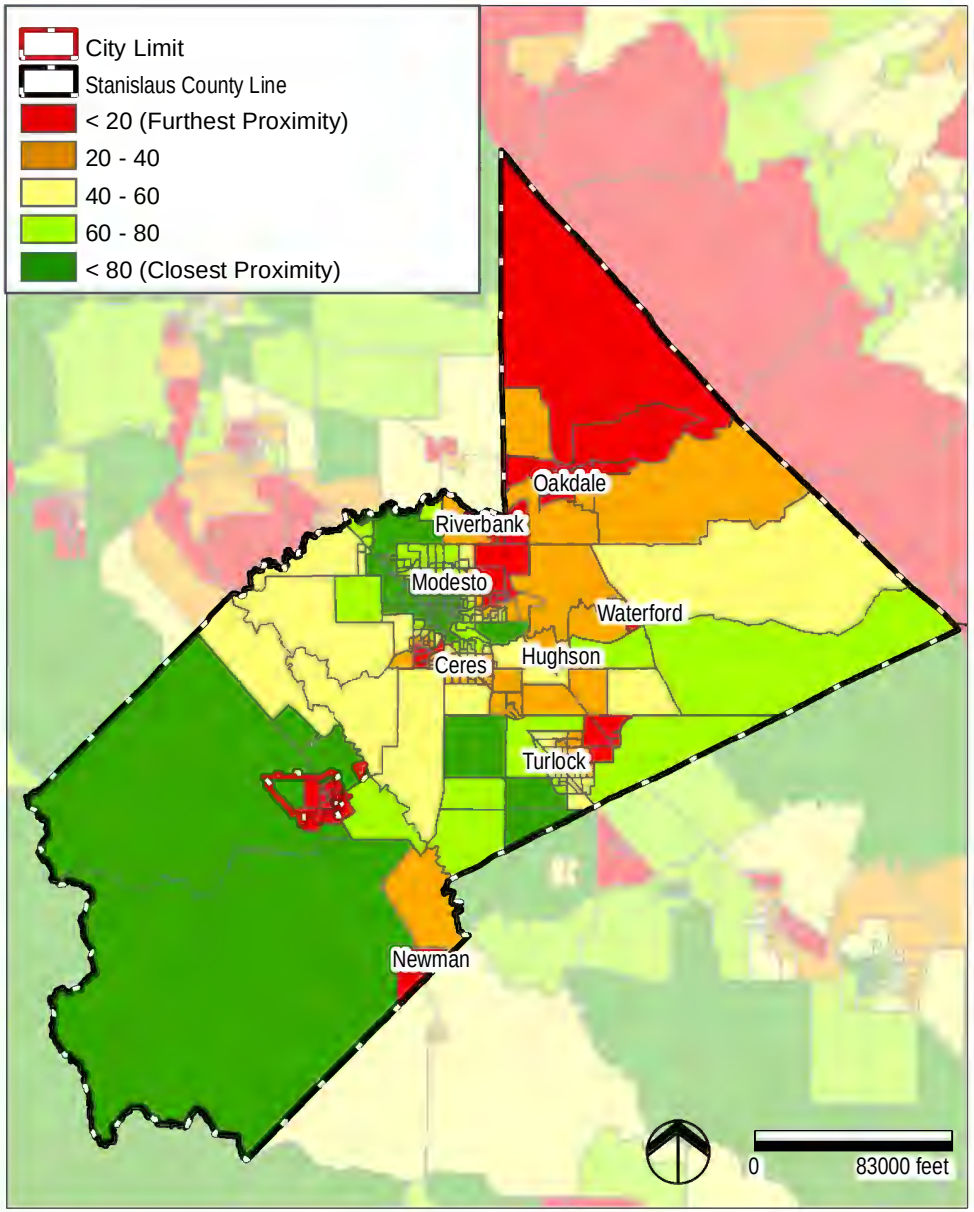
In Patterson, most of the city falls within the lowest range (<20) on the Jobs Proximity Index, indicating the city is largely comprised of smaller employment centers in combination with the furthest proximity to jobs. Areas with the lowest Jobs Proximity Index are characterized by a mix of residential and commercial uses. However, due to the small scale of employment centers compared to the number of households, it is likely that households must travel outside of city limits to obtain employment. The northwestern and northeastern outskirts show the highest range (>80), characterized by light and heavy industrial land uses that provide jobs to residents. These areas are near single-family residential zones, positioning these households close to industrial employment centers, which tend to be larger in nature than commercial employment centers.

Local Perspective

As previously discussed in Section 4.5 Household Income and Poverty Status, a significant portion of Patterson's workforce is employed in construction, retail trade, manufacturing, and arts, entertainment, recreation, accommodation, and food services (totaling 47 percent).

While single-family residential is the most abundant housing typology in the city, its distribution extends well beyond that of commercial land uses. This disparity may pose difficulties for households that lack personal transportation and do not have access to public transportation. Multi-family housing is primarily permitted in the central region and eastern quadrants of the city. This distribution benefits households without private transportation and in need of public transportation, as it is located near transit stations. Disparities in access to employment centers may be more significant for households located in the outskirts of Patterson, where public transportation service is not easily accessible.





Note: Satellite parcel to the northwest is a part of Zacharias MP Area

Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-14

Jobs Proximity Index

City of Patterson 6th Cycle Housing Element

The City has consistently prioritized enhancing educational skill sets, especially for vulnerable populations, including those experiencing homelessness. As outlined in Chapter 1, Housing Needs and Constraints Assessment, the City initiated a partnership with the HOST House in 2012, which has grown to encompass educational workforce programs aimed at equipping homeless residents with the necessary skills to enter the workforce. This initiative also continues to provide critical shelter assistance, reflecting the City's commitment to addressing educational, economic, and basic needs concurrently.

The City recognizes the importance of economic growth and mobility for its residents and overall well-being. The City does not have an Economic Development Department with dedicated staff to foster and grow businesses; however, the City Manager and Community Development Director fulfill this role. To ensure economic opportunities are fostered, the City has included Program 5.9 (see Chapter 3). This program aims to support and assist low-income households by expanding low-barrier, low-skill job opportunities. The City plans to meet with community-based partners and the Chamber of Commerce to identify strategies to increase economic opportunity.

Transit Access and Walkability

Reliable public transit and active transportation options (walking and biking) are essential for low-income residents and persons with disabilities to access employment opportunities. These options can reduce income burden and increase housing mobility, allowing residents to find housing in more areas. A lack of transportation options can limit fair housing choices and reinforce barriers for low-income residents in accessing opportunities.

Access to transportation is measured using AllTransit Metrics, which include a Performance Score assessing connectivity, job access, service frequency, and the percentage of commuters using transit. The score ranges from 0 to 10, with 10 indicating the highest level of transit performance. The HUD and Department of Transportation's Location Affordability Index estimates household and transportation costs at the census tract level, considering auto ownership, housing costs, and transit use for both homeowners and renters. It also accounts for block density, local job density, and the number of households per acre, as denser development often supports walkability and reduces transportation costs.

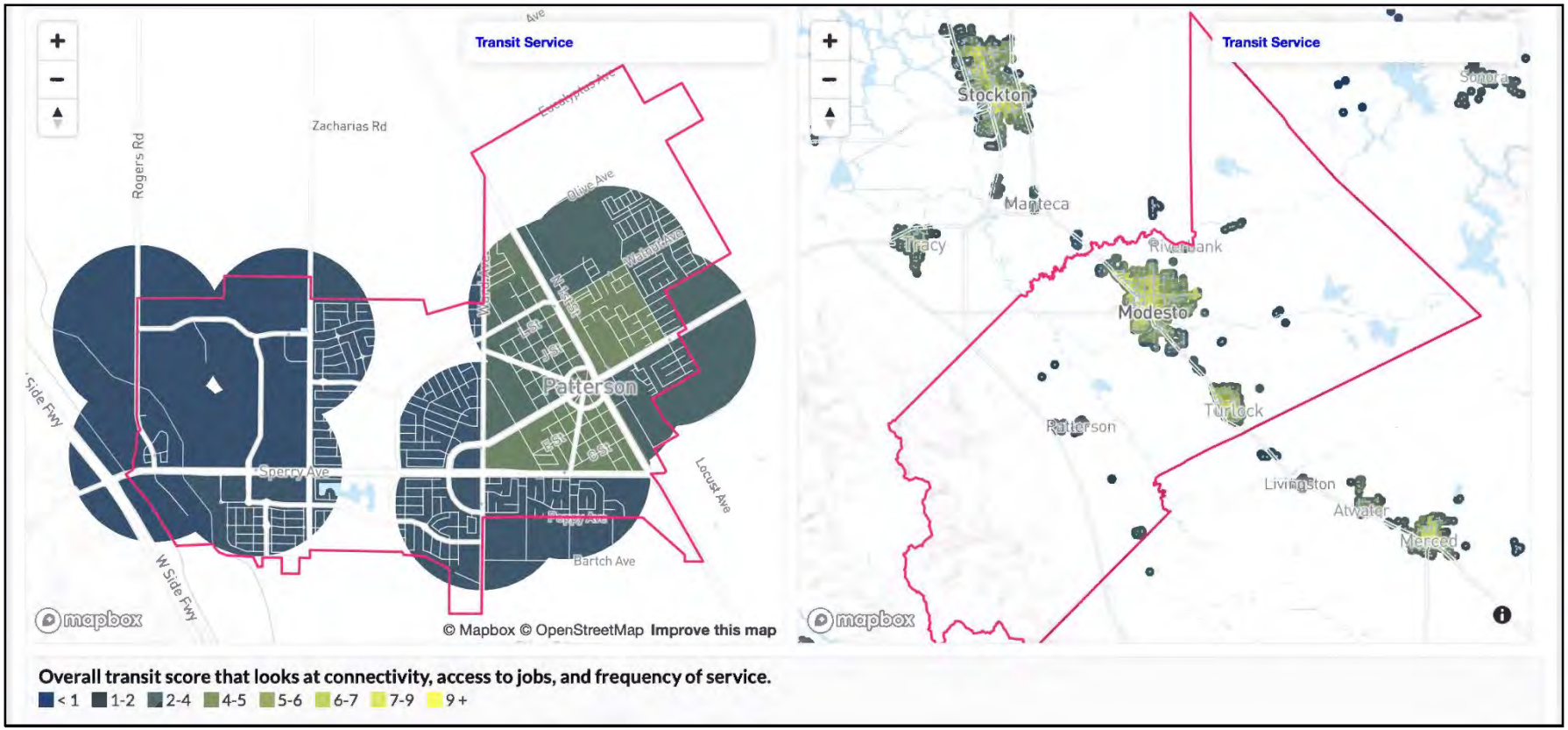
Regional and Local Trends

Figure A-15 illustrates AllTransit Performance for Stanislaus County and Patterson.[19] Stanislaus County has an AllTransit Performance Score of 3.6, indicating low weekly trip frequency and limited job access, resulting in only 0.84 percent of commuters using transit. Despite this, 73.5 percent of households and 71.4 percent of jobs are within a half-mile of transit. State law defines high-quality transit stops as those with rail or bus rapid transit stations, ferry terminals served by bus or rail, or intersections of major bus routes with service intervals of 15 minutes or less during peak commute times. In Stanislaus County, high-quality transit stops are mostly found in urban areas of Modesto, Ceres, Turlock, and Patterson. Unincorporated areas, including those near cities, generally lack high-quality transit stops, with community feedback indicating unreliable transit access in these regions.

Patterson has an AllTransit Performance Score of 1.9, reflecting low weekly trip frequency and limited job access, with only 0.07 percent of commuters using transit. As shown in Figure A-15, connectivity, job access, and service frequency are highest in the eastern quadrants near downtown. This benefits lower-income households, as subsidized housing and a mix of medium- and high-density residential areas are concentrated in the northeast quadrant. Additionally, schools like Del Puerto High School and Patterson High School are located in this area of increased connectivity and transit access. While the city's downtown area has the greatest connectivity, access to jobs, and frequency of service in Patterson, the rest of Patterson lacks the same level of transportation accessibility. An improvement in transportation services and accessibility would lead to greater access to job opportunities and a higher economic score.

[19] https://alltransit.cnt.org/metrics/#map

Figure A-15 AllTransit Performance Score, Stanislaus County and City of Patterson



SOURCE: AllTransit, 2024

Local Perspective

As discussed in Chapter 1, Housing Needs and Constraints Assessment, the Stanislaus Regional Transit Authority operates Route 45, connecting Patterson to Newman and Turlock, Route 40, that provides service to Modesto, and the BART Commuter bus links Patterson to Turlock and Pleasanton BART station. All transit services are centered around downtown, which may pose challenges for residents on the outskirts, a common issue for rural cities. To improve accessibility, the City has actively pursued infrastructure improvements focused on transportation and pedestrian safety. Measure L, approved by Stanislaus County voters in November 2016, raised sales tax in April 2017 to enhance local streets, improve connectivity, and reduce congestion. Projects funded by Measure L include the following:

- Citywide Sidewalk Replacement Project – city-wide;
- Sperry Avenue Improvements – located between Baldwin Road and American Eagle Avenue; and
- Pedestrian Safety Improvement Project – located along Las Palmas (between 7th and 9th Streets) and Ward Avenue (between 9th Street and Salado Avenue).

In addition to recently completed infrastructure projects, the City has a number of transportation and roadway safety projects underway that are rooted in expanding transportation opportunities, including the following:

- Active Transportation Program (ATP) – the City received funding through the ATP Funding Cycle Four to create a city-wide plan. This plan will identify pedestrian and bicycle infrastructure deficiencies, recommend solutions, and address future demands for active transportation expansion;
- Local Roadway Safety Plan – the City was awarded $72,000 of funding through the Department of Transportation. These funds will be used to address mobility and transportation safety in the city; and
- Urban Bicycle Trail Project – the City received funding from the Urban Greening Grant Program to build a 1,300-foot asphalt bike and pedestrian trail along American Eagle Avenue, from Calvinson Parkway to Sperry Avenue. This will connect the city's northern and southern quadrants in the western area.

These projects are intended to improve connectivity and accessibility throughout the city. Program 1.9 establishes a schedule of actions and metrics to ensure transportation improvements target areas that currently lack adequate transit (see Chapter 3).

Healthy Environment

This analysis examines disparities in environmental health indicators by neighborhood and population, focusing on air quality, water quality, neighborhood safety, environmental hazards, social

services, and cultural institutions. California legislation (SB 535, AB 1550, SB 1000) and federal HUD regulations emphasize the importance of environmental justice in fair housing, ensuring equal protection of the environment and human health for all, regardless of race, color, national origin, or income. Federal regulations require assessing the impact of federally assisted projects on minority and low-income populations. The California Office of Environmental Health Hazard Assessment's CalEnviroScreen identifies communities disproportionately affected by multiple pollution sources, with higher scores indicating greater pollution burdens and vulnerability.

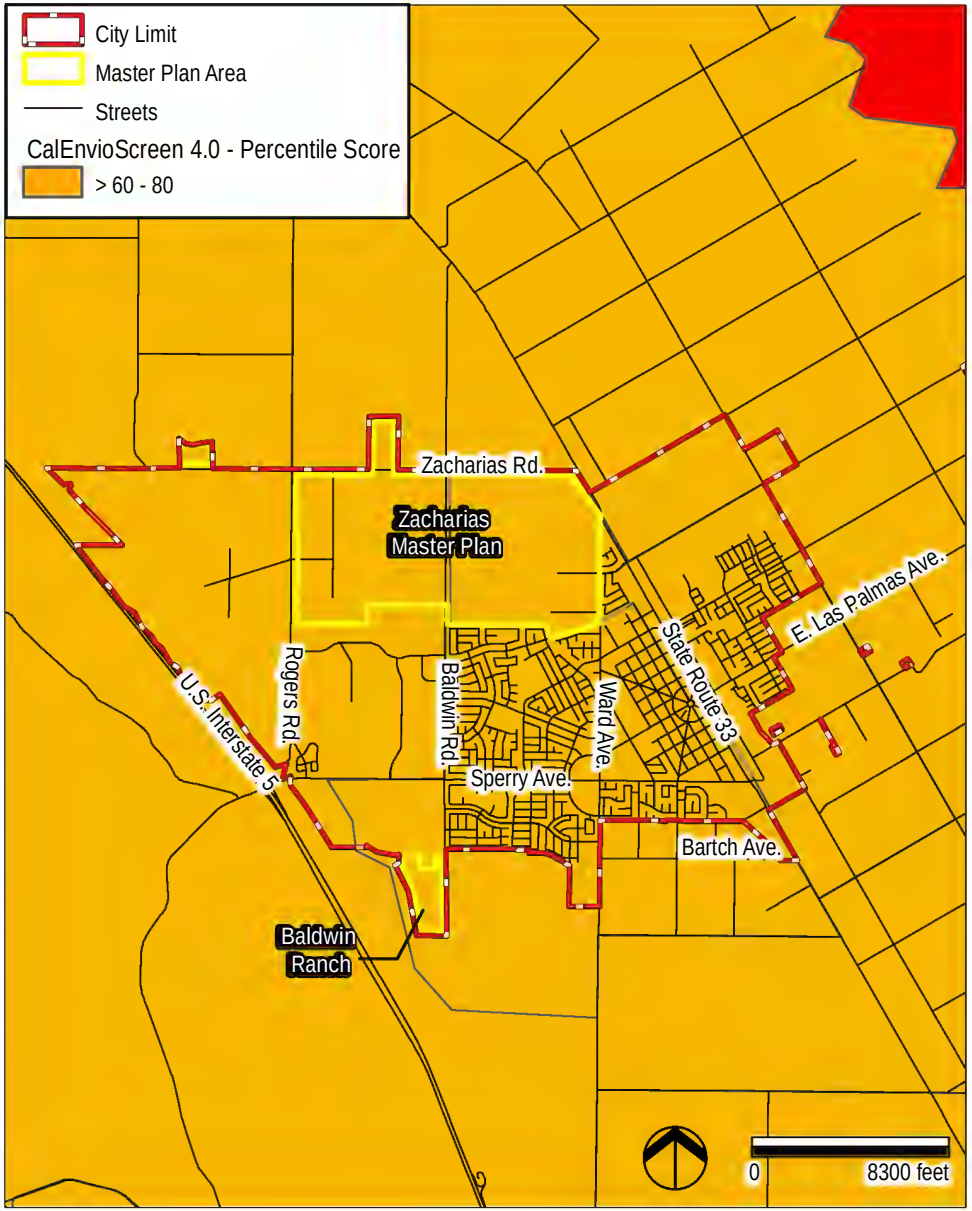
Regional and Local Trends

Figure A-16 illustrates CalEnviroScreen Percentile Scores for Stanislaus County and Patterson. The CalEnviroScreen map for Stanislaus County shows varying pollution burdens, with scores ranging from the 38th to the 100th percentile. Pollution is highest in the western county, especially near and west of the San Joaquin River, and lowest in parts of Modesto, Patterson, and Turlock. High pollution levels are due to drinking water contaminants, pesticide use, groundwater threats, and proximity to solid waste sites. Western areas also face additional pollution from nearby cleanup sites and impaired waters. These regions have a high prevalence of factors that increase vulnerability to pollution, such as low education levels, high poverty, and high unemployment.

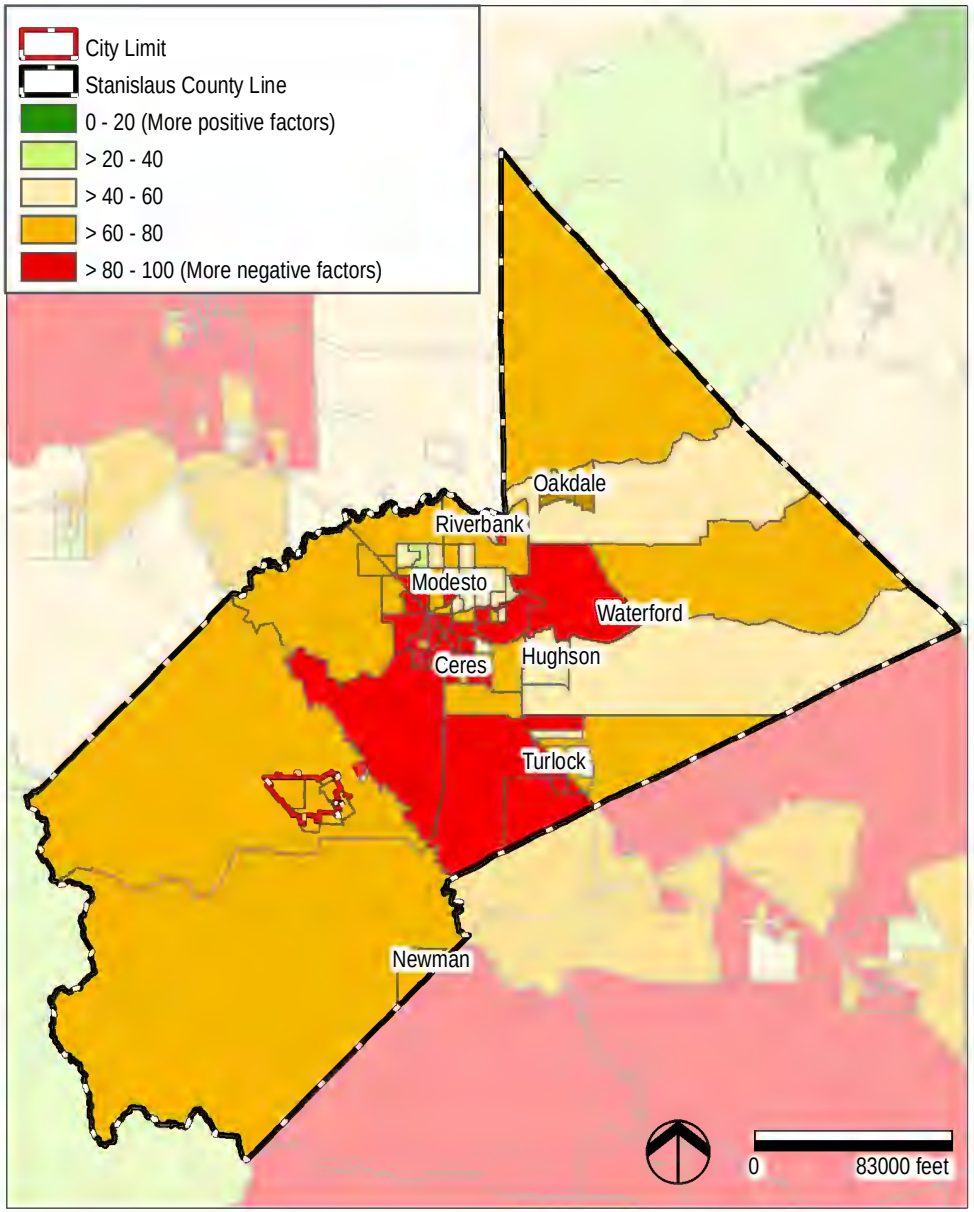
In Patterson, the CalEnviroScreen map indicates a fairly consistent level of pollution burden city-wide, with scores ranging from the 60th to 80th percentiles. The eastern quadrants have a slightly lower pollution burden, scoring in the 61st percentile, while the western quadrants have a higher burden, scoring in the 67th percentile. The city's top pollutant burdens consist of ozone, particulate matter 2.5, and diesel particulate matter. The western quadrants of the city, specifically the area between Rogers Road and Baldwin Road, are primarily characterized by light industrial uses. Heavy industrial uses are located in the northern quadrants, bordered by Rogers Road and State Route 33, as well as in the eastern quadrants along State Route 33 near the downtown area. Additionally, the city is largely surrounded by unincorporated areas of Stanislaus County that are characterized by agricultural uses. These combined land uses have likely contributed to the city's high CalEnviroScreen Percentile Score, indicating potential environmental concerns related to industrial and agricultural activities.

Local Perspective

The City's general plan includes policies that regulate the location of sites involving the storage or use of hazardous materials and policies aimed at protecting local water quality. It also regulates open space areas and sets standards for the number of parks required to serve city residents, maintaining a standard of five acres of developed parkland per 1,000 residents. Additionally, the general plan outlines requirements for new developments, such as land dedications, improvements, payment of in-lieu fees, or a combination of these options. These measures ensure that adequate open space is provided as new developments are constructed.



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-16

CalEnviroScreen 4.0 Percentile Scores

City of Patterson 6th Cycle Housing Element

Parks are distributed throughout the city, providing ample open space for all residents. The development of the Zacharias and Baldwin Ranch Master Plan areas will include additional parks and open space, ensuring there are sufficient outdoor areas to support the anticipated increase in residential units in both the northwestern and southwestern regions of Patterson.

To address environmental health outcomes and support positive environmental conditions, actions such as buffering, site planning, and other techniques are enforced to ensure that new developments are located in safe and healthy environments.

The City has identified Program 5.7, which establishes targeted capital improvements moderate resource areas situated east of State Route 33 and west of Baldwin Road (see Chapter 3). The City will direct CIP resources to these areas to address existing challenges east of State Route 33 and to facilitate revitalization and residential growth west of Baldwin Road.

A.8 Disproportionate Housing Needs

Disproportionate housing needs refer to significant disparities in the proportion of members of a protected class experiencing housing-related challenges. To assess the extent of these needs in Patterson, this section examines data on various types of housing needs, including housing cost burden, severe housing cost burden, overcrowding, homelessness, and substandard housing conditions.

Housing Problems

Many federal and state programs use the age of housing to assess a community's housing rehabilitation needs, as older housing can indicate a need for repairs. Over time, housing deteriorates physically and technologically, potentially leading to issues like plumbing and roof repairs, foundation work, and the presence of health hazards such as lead paint and asbestos. Homes over 30 years old are particularly likely to require rehabilitation. According to HUD, a housing unit has a problem if it lacks complete kitchen or plumbing facilities, is overcrowded, or is cost-burdened.[20] Issues like mold can exacerbate health conditions such as asthma. Often, renters are at higher risk of exposure to poor housing conditions due to concerns about rent increases or losing their housing.

[20] HUD 2021. https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html

Regional and Local Trends

Figure A-17 illustrates the percentage of households in Stanislaus County with any of the four severe housing problems, including lacking complete kitchen or plumbing facilities, overcrowding, or cost-burdened. Regionally, 20-40 percent of households in most incorporated areas of Stanislaus County experience of any four severe housing problems. Like the cities of Turlock, Ceres, and Oakdale, Patterson falls within this range. According to ACS 2022 data, 100 percent of households in Patterson had complete plumbing, and 98 percent had complete kitchen facilities.[21] However, cost burden and overcrowding rates in Patterson vary geographically, with some areas more affected by these issues. Cost burden and Overcrowding are discussed further below.

The City's Building Department estimates that approximately 5 percent of the housing stock (roughly 350 units) requires substantial rehabilitation or replacement. The eastern and downtown areas, which feature older infrastructure and a higher concentration of lower-income households, are particularly in need of residential rehabilitation. These regions include a mix of single-family homes and multi-family apartments.

In single-family homes, rehabilitation decisions are made by individual homeowners, who consider factors such as property size, layout, and potential historic designations. In multi-family housing, rehabilitation is typically managed by property management or housing associations, which must balance tenant needs with compliance with building codes.

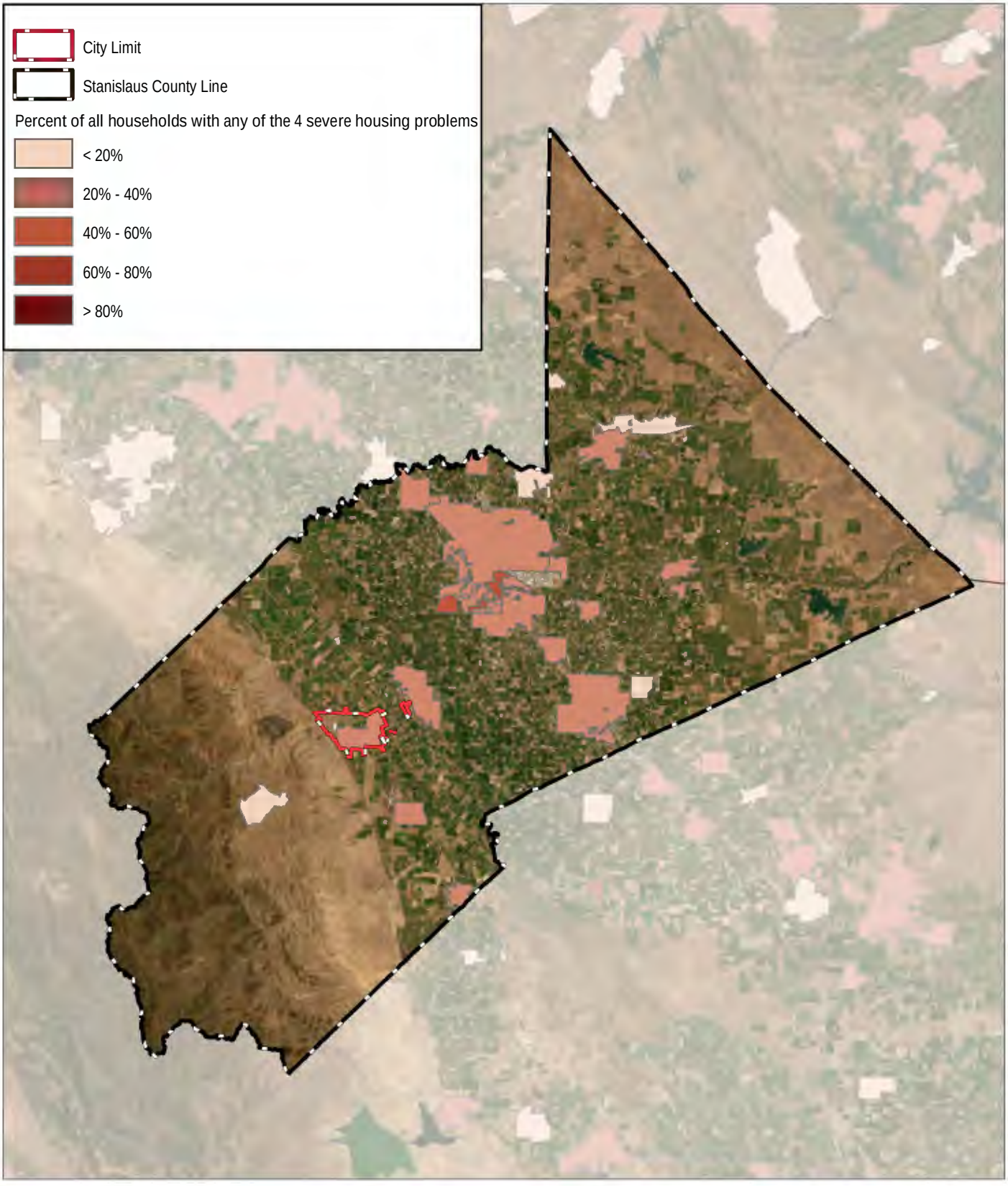
The ownership structure and housing tenure significantly impact the timing, scope, and financial responsibility of repairs. Homeowners have control over repair decisions and bear the costs, while renters typically have limited control and are not financially responsible for repairs.

Program 2.1 outlines the actions the City will take to ensure all housing units meet basic health and safety standards by enforcing local codes (see Chapter 3).

Housing Cost Burden

Housing cost burden is defined as the percentage of a household's total gross income spent on housing expenses. Households spending 30 percent or more of their income on housing (including rent, mortgage, and utilities) are considered cost burdened, while those spending over 50 percent are severely cost burdened. Higher housing cost burdens increase the likelihood of residents living in overcrowded or substandard conditions and reduce their ability to afford relocation.

[21] ACS 2022. https://data.census.gov/table/ACSST5Y2022.S2504?q=housing&g=160XX00US0656112&d=ACS%205-Year%20Estimates%20Subject%20Tables&moe=false



Source: CA HCD 2024,
Stanislaus County GIS 2024

Figure A-17

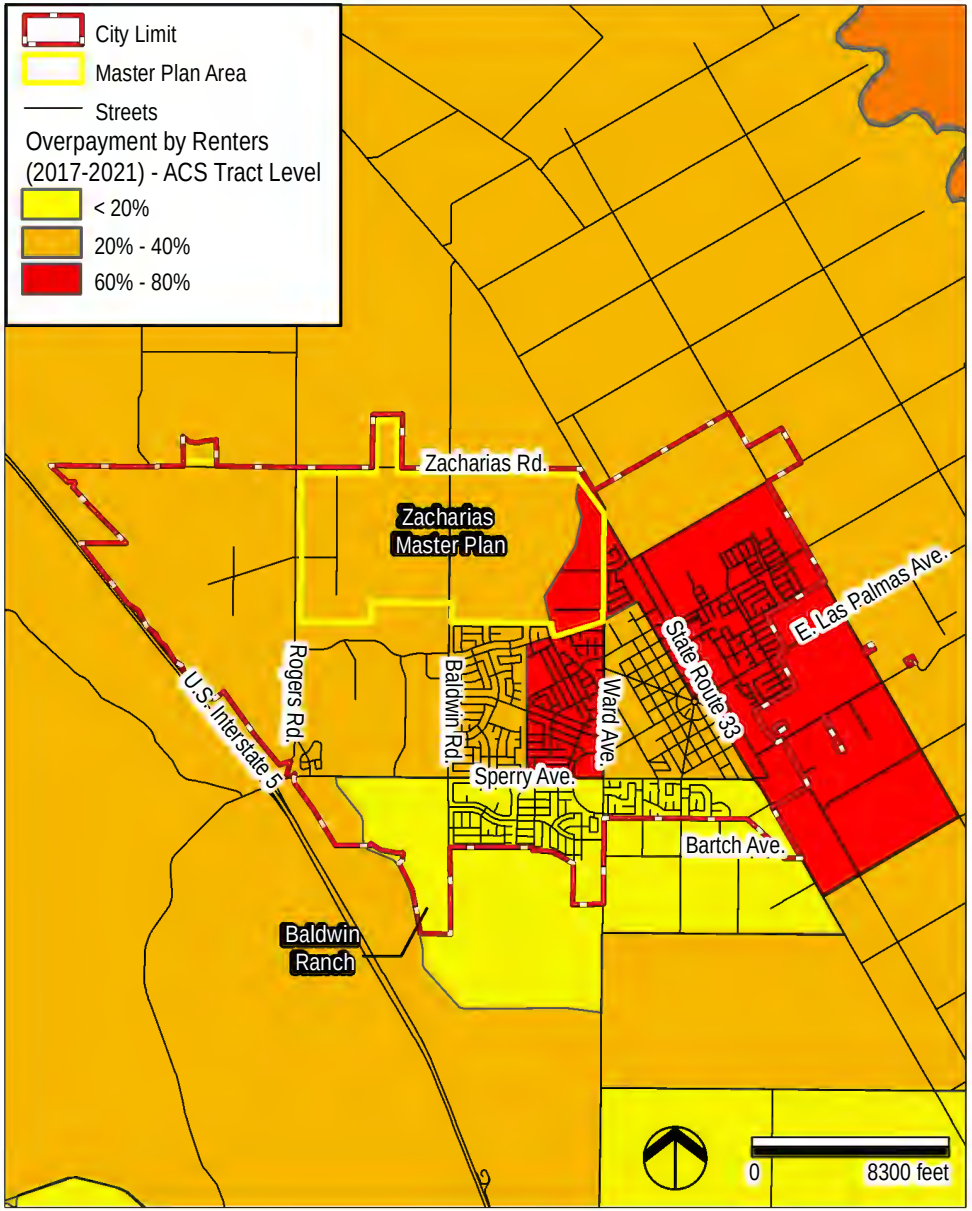
Percent Households with any Four Severe Housing Problems, Stanislaus County

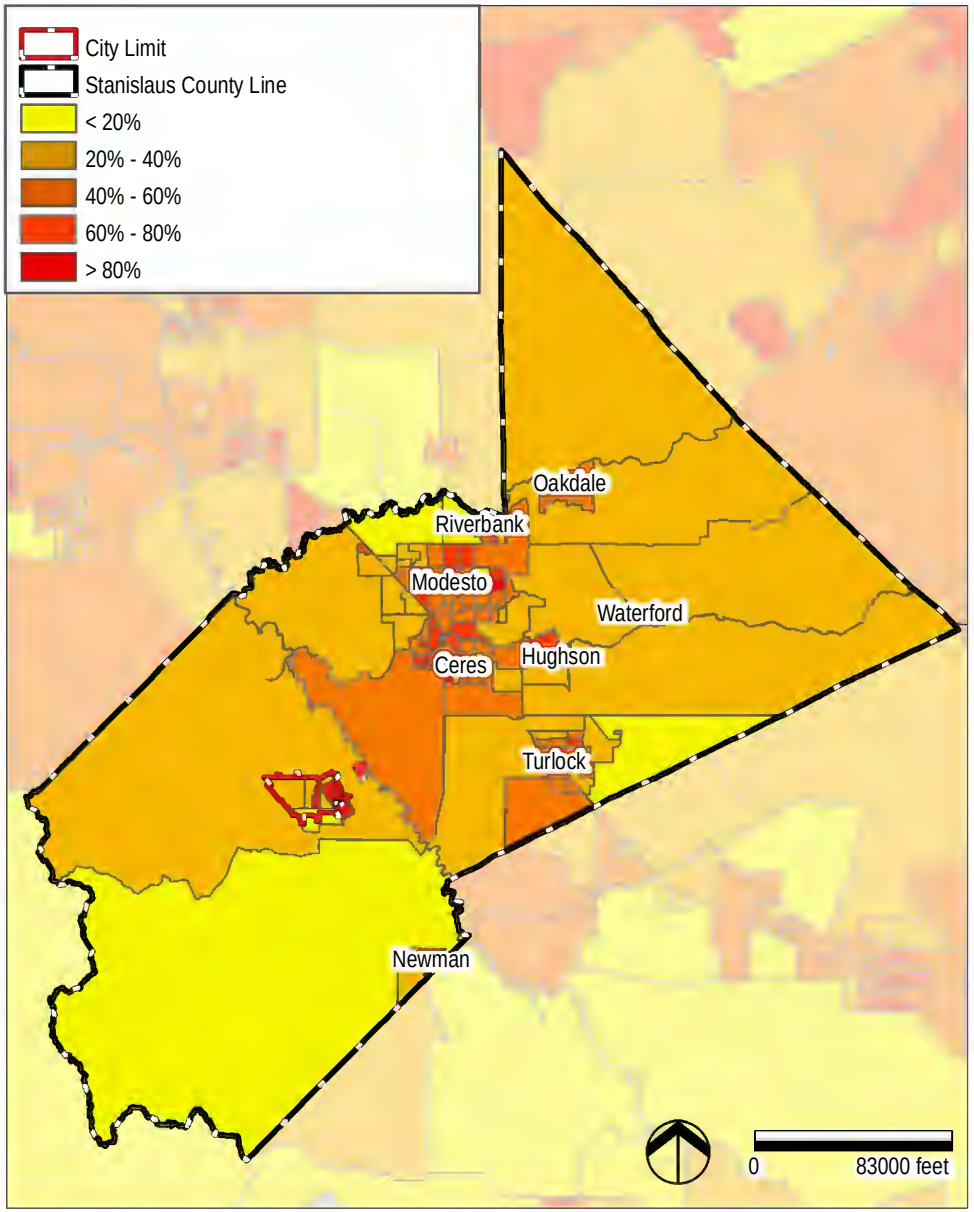
Regional and Local Trends

Figure A-18 and Figure A-19 illustrate housing cost burden among renter-occupied and owner-occupied households in Stanislaus County and Patterson, respectively. Throughout Stanislaus County, the percentage of renter households spending 30 percent or more of their income on gross rent (including contract rent and tenant-paid utilities) is concentrated in urban areas and is notably high in the South Modesto CDPs. In neighborhoods like Rouse, Bystrom, and Bret Harte, 60 percent to 80 percent of renter-occupied households experience cost burden (Figure A-18). Bystrom and Rouse also see high cost burden rates among owner-occupied households with mortgages exceeding 30 percent of their income. In Westley, Grayson, and Diablo Grande, 40 percent to 60 percent of owner-occupied households face similar cost burden issues (Figure A-19). Unlike renter cost burden, homeowner cost burden is common in both urban and rural areas. Most areas with high renter cost burden are predominantly Hispanic/Latino, and these overlap significantly with areas experiencing higher poverty rates.

In Patterson, the percentage of cost-burdened renter-occupied households varies widely, from less than 20 percent to as high as 80 percent (Figure A-18). The highest concentrations of cost-burdened renters are mainly found in the eastern quadrants (61 percent) and some parts of the northwestern quadrants (60 percent), specifically between Baldwin Road and Ward Avenue. The eastern quadrants are designated as moderate to high resource areas but have higher poverty rates (16.2 percent), a higher percentage of individuals with disabilities (14.2 percent), and lower median household incomes ($55,000 to $90,100). In contrast, the western quadrants are primarily high-resource areas with higher median incomes ($90,100 to $120,000), lower poverty rates, and fewer individuals with disabilities. The percentage of cost-burdened owner-occupied households shows less geographic variation compared to renter-occupied households, with about 40 percent to 60 percent of homeowners city-wide experiencing cost burden (Figure A-19). However, one area in the northeastern quadrant, bordered by Ward Avenue and State Route 33, has a notably low percentage of cost-burdened owner-occupied households at 14 percent. This area features downtown residential, downtown core, and commercial uses, whereas surrounding areas to the east and west are predominantly single-family homes.

The differences in cost burden between renter-occupied and owner-occupied households in Patterson suggest varying economic challenges. Renters, especially in the eastern and some northwestern quadrants, face higher cost burden, linked to higher poverty rates and lower median incomes in those areas. In contrast, the cost burden among homeowners is more evenly spread across the city, with a notable exception in the northeastern quadrant, where fewer owners are cost-burdened. This disparity highlights a greater vulnerability among renters and suggests a need for targeted housing affordability support for renter households.





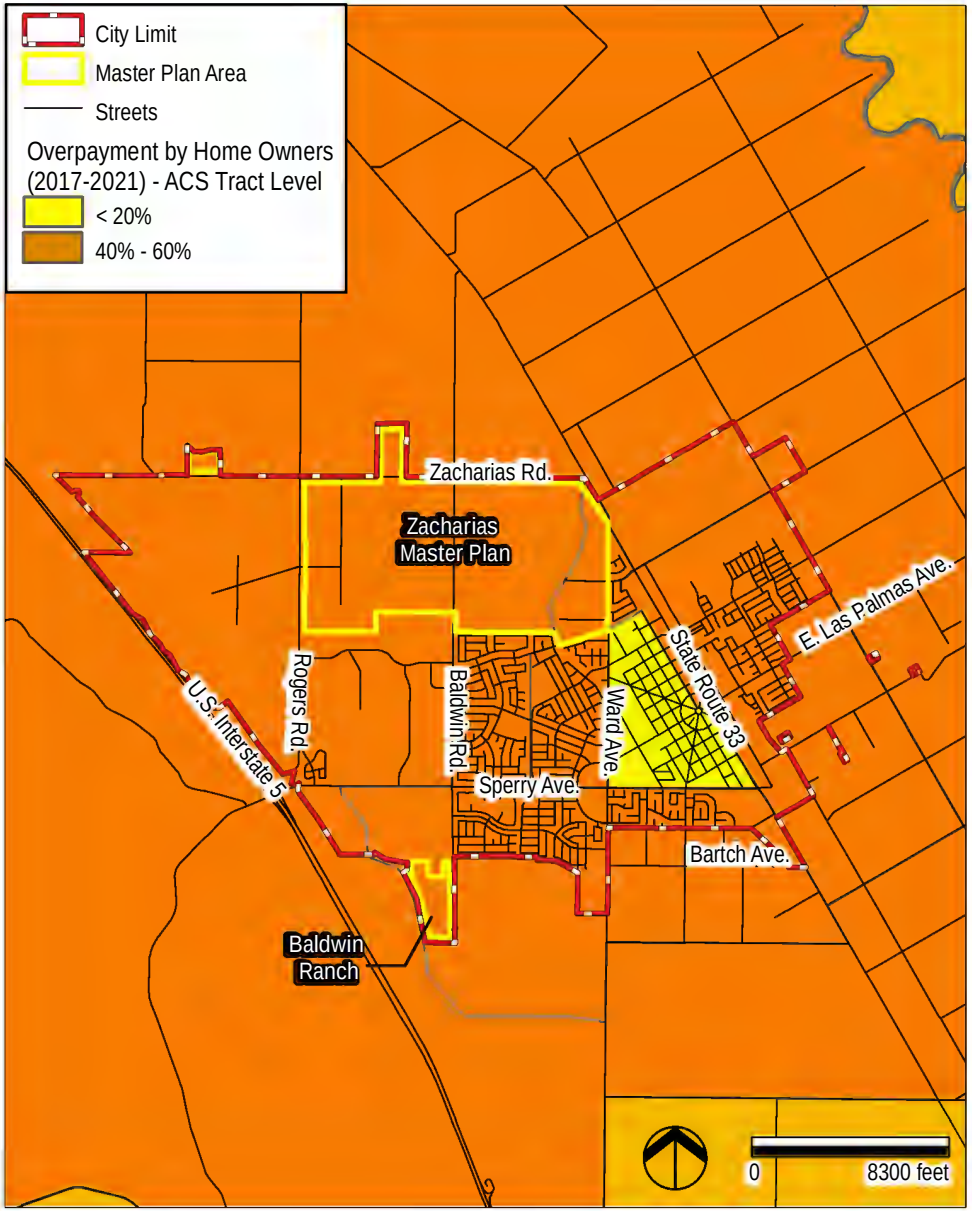
Note: Satellite parcel to the northwest is a part of Zacharias MP Area

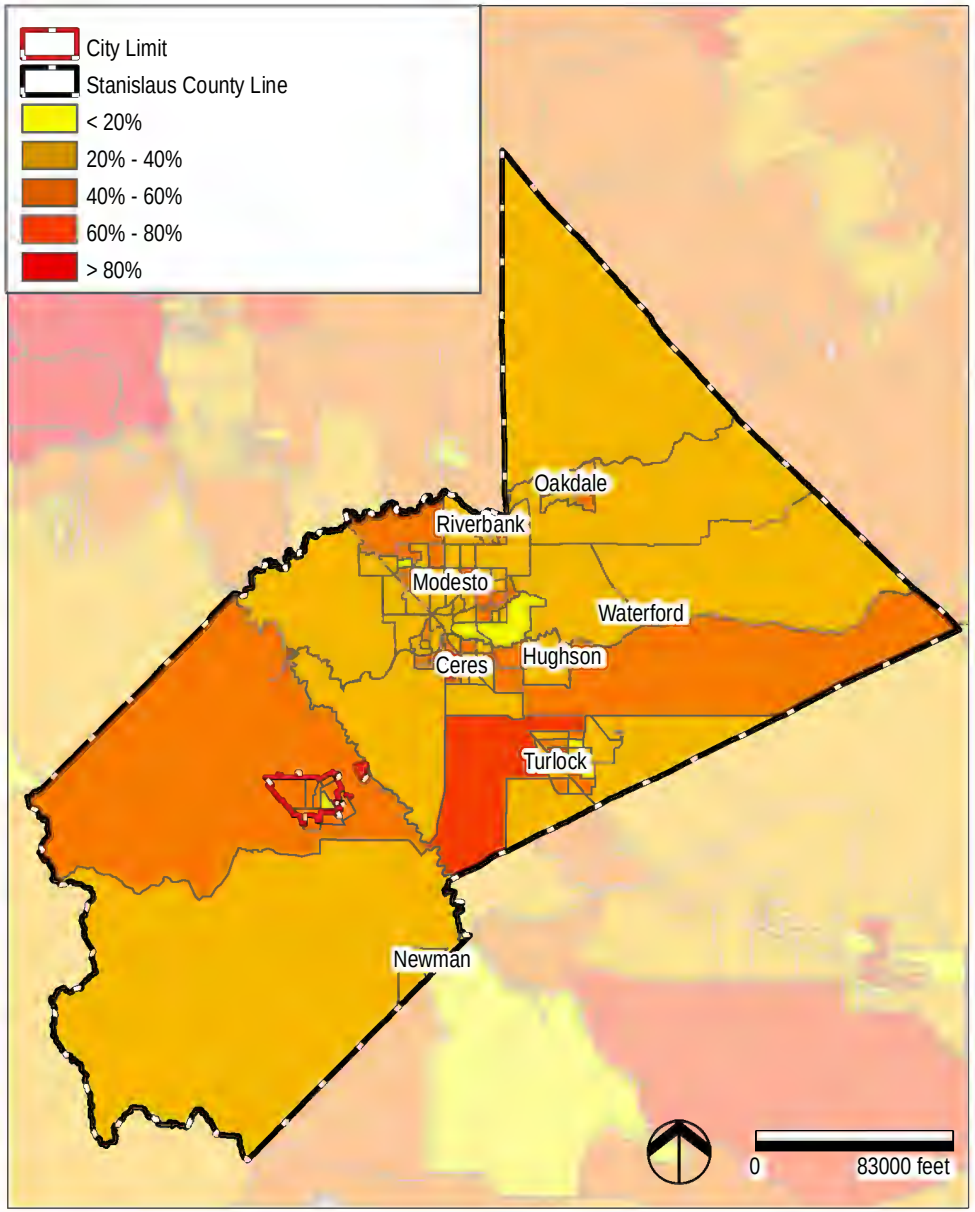
Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-18

Housing Cost Burden by Renters

City of Patterson 6th Cycle Housing Element





Note: Satellite parcel to the northwest is a part of Zacharias MP Area

Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-19

Housing Cost Burden by Homeowners

City of Patterson 6th Cycle Housing Element

Localized Perspective

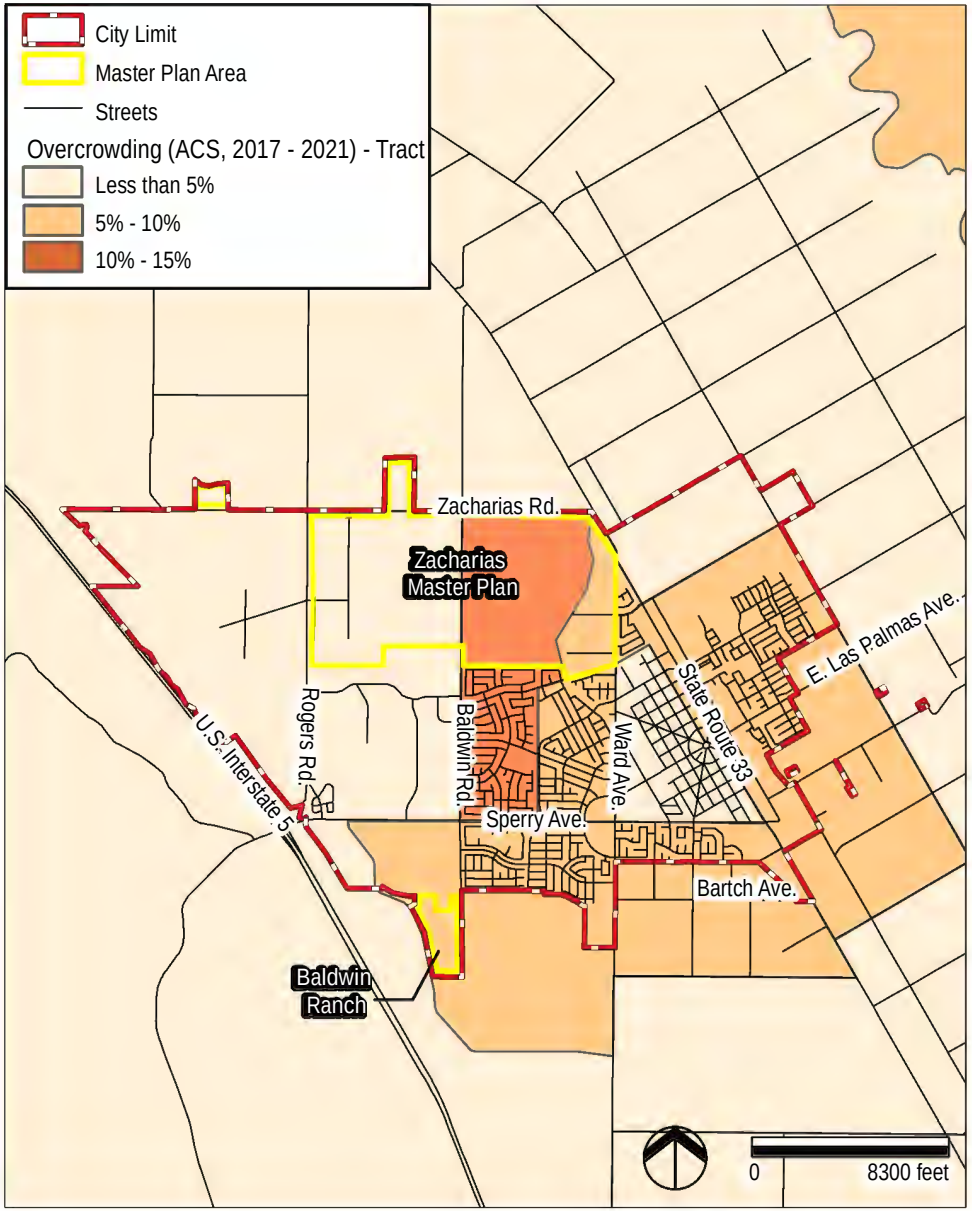
Based on local knowledge, the City attributes the higher rates of cost-burdened households in the eastern quadrant and central core to distinct development and land use patterns. The areas west of Baldwin Road are primarily characterized by light industrial uses, which do not permit residential development. Similarly, regions west of Ward Avenue and south of Sperry Avenue feature a mix of commercial and limited residential uses, while the western quadrant, particularly west of American Eagle Avenue and south of Sperry Avenue, has seen recent residential development following annexation over the past 20 years. In contrast, the central core and eastern areas, particularly east of State Route 33, are predominantly residential. Additionally, the eastern quadrant experiences lower median household income and higher rates of poverty, further contributing to the concentration of cost-burdened households in this area. The greater proportion of residential land in the eastern quadrant compared to the west may also contribute to a skewed perception of concentrated cost burden across the city. The City is not aware of any patterns of eviction in the city.

Overcrowding

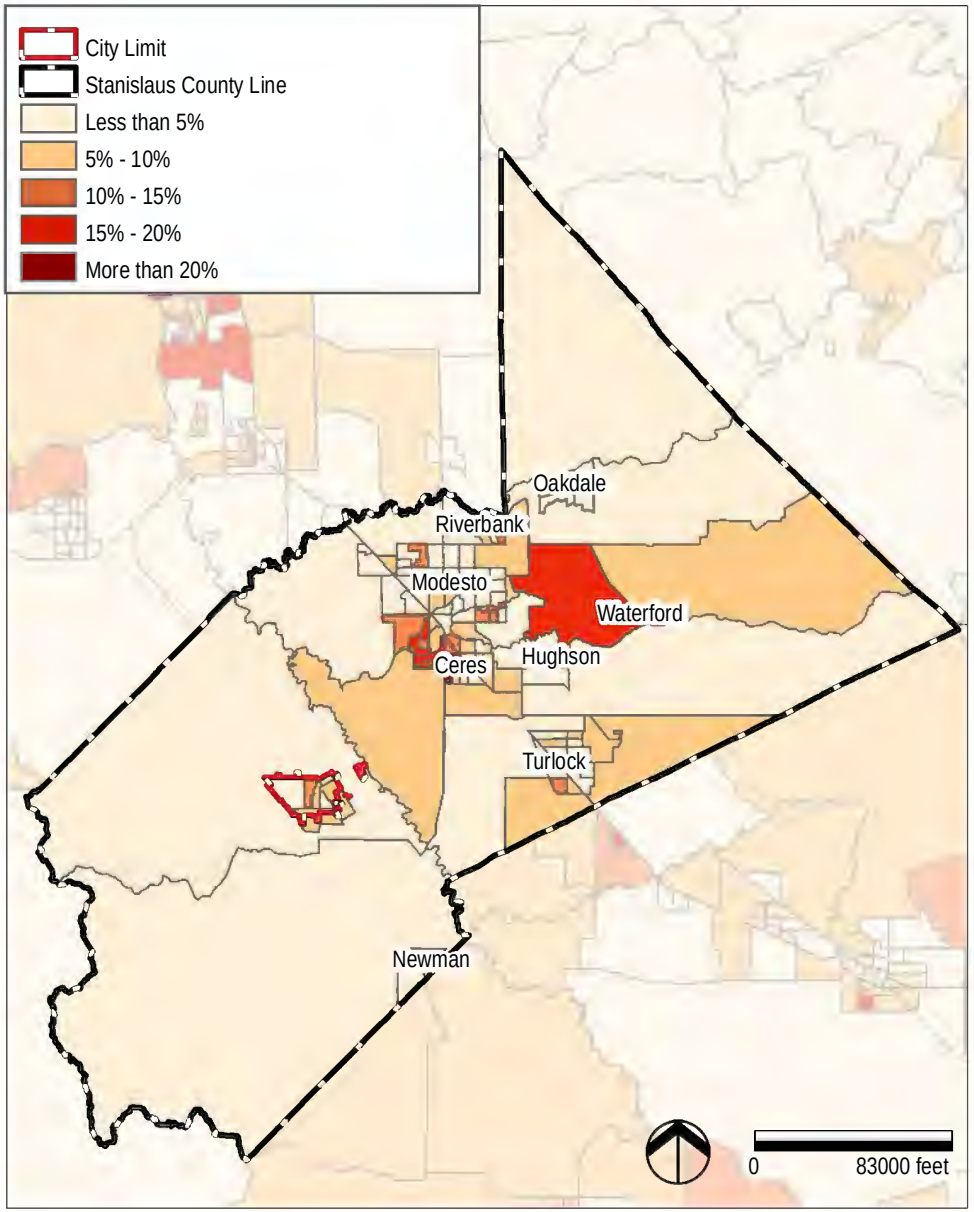
Overcrowding is defined as having more than one person per room in a housing unit, excluding bathrooms and kitchens, while severe overcrowding involves more than one and a half persons per room. This issue arises when a unit is too small for a household's needs, extended family members live together, or unrelated individuals or families share a unit. Large families often face overcrowding due to lower per-capita income and the limited availability or high cost of larger units. These families may rent smaller units or share housing to manage costs. Fair housing issues can arise if non-traditional households are denied housing due to perceptions of overcrowding. Addressing overcrowding is challenging because there are no standardized guidelines for determining maximum unit capacity, and policies limiting overcrowding could disproportionately affect specific racial or ethnic groups.

Regional and Local Trends

Figure A-20 illustrates household overcrowding in Stanislaus County and Patterson. Overcrowding in Stanislaus County varies geographically, ranging from less than 5 percent to over 20 percent. It is most prevalent in urban areas, particularly in the Modesto region. The highest overcrowding rates, exceeding 20 percent, are in Rouse, Bystrom, and Airport. According to the 2020 ACS 5-year estimates, overcrowding rates in Stanislaus County were similar to the state average. However, severe overcrowding was much higher at the state level (6.4 percent) compared to Stanislaus County (3.4 percent). Areas with higher overcrowding rates often overlap with low-resource areas and those characterized by high segregation, poverty, poorer economic outcomes, and lower environmental scores.



Note: Satellite parcel to the northwest is a part of Zacharias MP Area



Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-20

Overcrowded Households

City of Patterson 6th Cycle Housing Element

In Patterson, overcrowding varies geographically, ranging from less than 5 percent to as high as 11 percent (Figure A-20). Most of the city experiences overcrowding levels between 5 percent and 10 percent. The highest prevalence of overcrowding, around 11 percent, is concentrated in the northwestern quadrant, specifically between Baldwin Road and American Eagle Avenue. This area is designated as a high-resource area, characterized by higher median household incomes, and lower rates of poverty and disability. The presence of overcrowding in these areas suggests that housing supply may not be keeping pace with demand and/or the housing types available are not suited for large families (5+ persons), leading to situations where households are forced to accommodate more people than ideally suited for the available space.

In the eastern quadrants of the city, where median household income is lower and both poverty rates and the proportion of individuals with disabilities are higher, overcrowding levels are lower than in high-resource areas, ranging from 5 percent to 10 percent. Additionally, overcrowding levels are lower in the southern quadrants of the city. This is indicative of more available housing units relative to demand and/or that households in these areas may be smaller or less likely to accommodate additional family members. It may also reflect differences in housing types, such as the availability of affordable multi-family housing options that can accommodate larger households, reducing the need for overcrowding. This pattern suggests that while economic disadvantage is present, overcrowding is not as pronounced a problem in these areas compared to more high resource parts of the city.

Localized Perspective

In the northwestern quadrant of the city, where household overcrowding is highest at 11 percent, the area is primarily characterized by low-density, single-family developments. Despite being a high-resource area with higher median household incomes, there is a lack of housing diversity. In contrast, the eastern and southern quadrants, which have slightly lower overcrowding rates, offer a mix of housing types, including medium- and high-density residential options such as townhomes, duplexes, triplexes, and apartments. The northeastern quadrant also includes 254 subsidized deed-restricted affordable units, providing affordable housing options for families in need. The City suspects that the limited variety of housing types and fewer opportunities to rent versus own in the northwestern quadrant contribute to the higher levels of overcrowding observed there. There is no other local knowledge regarding overcrowding or "doubling-up" of families in one house.

Homelessness

California Government Code Section 65583(1)(6) requires municipalities to address the special needs of persons experiencing homelessness within their boundaries. Homelessness, as defined by HUD, describes an individual, who is not imprisoned or otherwise detained, who:

- Lacks a fixed, regular, and adequate nighttime residence;

- Has a primary nighttime residence that is:
  - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
  - An institution that provides a temporary residence for individuals intended to be institutionalized; or
  - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Regional and Local Trends

The primary source of data on homelessness and shelters is the Point-in-Time (PIT) count, organized by the Stanislaus Community System of Care (CSOC). In 2024, the PIT count identified 2,052 people experiencing homelessness in Stanislaus County, with 980 unsheltered and 1,072 sheltered individuals. Of those counted, approximately 26 percent reported having a mental illness, 16 percent reported having a substance abuse disorder, and 11 percent were survivors of domestic violence. The majority were White, Hispanic/Latino, or Black/African American. In unincorporated communities, 78 individuals were counted, with the highest numbers in Empire. Stanislaus County has 14 emergency shelters, with approximately 93 percent of beds occupied, according to 2019 HUD data. Of the 1,072 sheltered individuals, 880 stayed in emergency shelters, including hotel/motels paid by non-profit organizations.[22]

According to the 2024 point-in-time count, there is an estimated 61 homeless persons in Patterson, which was the fourth highest homeless count in the county. Local knowledge indicates that most of Patterson's homeless population is concentrated near the city's urban core. Code enforcement, responsible for addressing homeless encampments, has identified concentrations of homeless individuals in downtown parks, such as South Park and Veteran Park, and along the railroad tracks that run north to south along State Route 33. As of September 2024, three encampments were reported along the railroad tracks, with one having been removed.

Localized Perspective

Concentrations of homeless persons in Patterson are located in close proximity to public transit and resources, including the Helping Other Sleep Tonight (HOST) House, which provides Patterson's homeless population with temporary housing, meals, clothing, toiletries, and educational training courses. The City has partnered with HOST House since 2012, and together they have greatly expanded the services available to the homeless population. Naomi's House is also located in Patterson and provides resources for women and children experiencing housing insecurity, including 20 beds for emergency housing.

[22] https://csocstan.com/wp-content/uploads/2024/07/English-2024-Stanislaus-County-PIT-Homeless-Count-Executive-and-Data-Summary.pdf

The City currently permits emergency shelters in the Heavy Industrial Zoning District; however, Program 4.6 proposes an amendment to permit emergency shelters by-right in the Downtown Core Zoning District (see Chapter 3). Given the prevalence of homeless persons in the City's downtown area, development of an emergency shelter in this area would address the present need. Additionally, this location provides a central point to access public transit, services, and employment centers. Due to limited funding, the City does not currently provide emergency rental assistance.

Displacement

Displacement, as defined by HCD, is any involuntary household move due to landlord actions or market changes. It is often driven by established patterns of racial inequity and segregation, shifts in neighborhood composition, public policies, capital investments, and private capital flows. Factors such as rising housing costs, income inequality, stagnant wages, and insufficient market-rate housing exacerbate displacement. Disinvestment in low-income communities, combined with investor speculation, can create a rent gap, where current rental income is lower than potential income if the property is repurposed for maximum profit. Displacement disproportionately affects people of color, lower-income households, persons with disabilities, large households, and those at risk of or experiencing homelessness.[23]

The Urban Displacement Project (UDP) categorizes displacement vulnerability levels as follows:

- Areas susceptible to displacement are typically low- or mixed-income neighborhoods with some stability but potential for future displacement risk;
- Areas at risk of or experiencing gentrification show rising housing costs and changes in housing supply, often near other gentrifying communities;
- Stable moderate/mixed-income areas have residents with moderate to high incomes and are not at immediate risk of exclusivity; and
- Stable/advanced exclusive areas have long been characterized by exclusionary practices.

Communities are designated sensitive if they currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. The following criteria is used to determine a community as sensitive:

- The share of very low-income residents is above 20 percent; and
- The census tract must also meet two of the following criteria:
    - The share of renters is above 40 percent; and
    - The share of people of color is above 50 percent.

[23] HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

- The share of very low-income households (50 percent AMI or below) that are severely rent burdened (spending 50 percent of income on rent) is above the county median;
- The census tract, or areas in close proximity, have been experiencing displacement pressures. Displacement pressure is defined as:
  - The percentage change in rent in a selected census tract, divided by county median rent increases; or
  - Median rent in a selected census tract, minus median rent for all surrounding tracts, divided by median rent for all tracts in county (rent gap).[24]

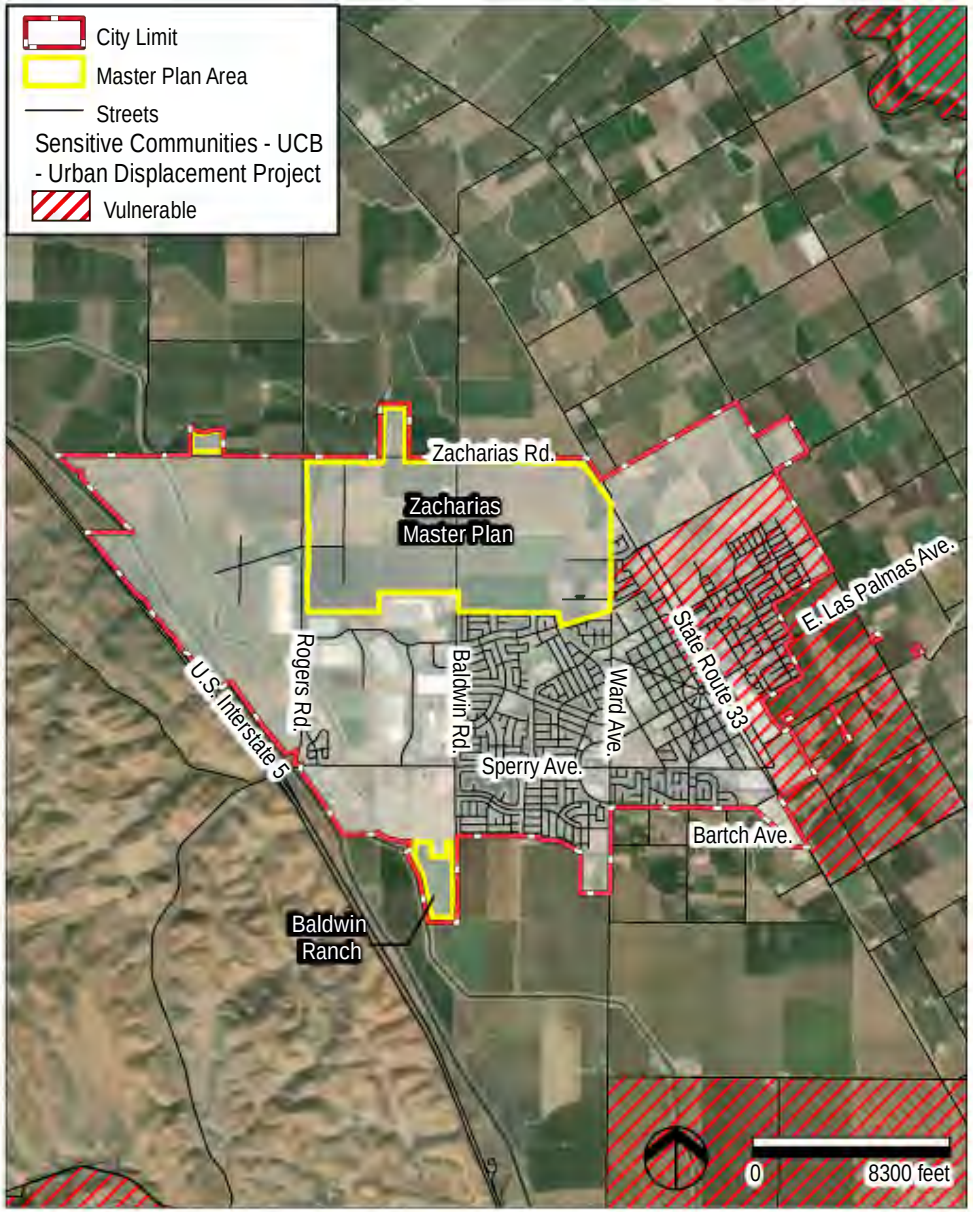
Regional and Local Trends

Figure A-21 illustrates the presence of sensitive communities in Stanislaus County and Patterson. In Stanislaus County, nearly all incorporated cities, except Oakdale, Waterford, and Newman, had sensitive communities. Unincorporated areas with sensitive communities were mainly concentrated in CDPs near Modesto and west of Patterson. In these sensitive areas, more than 40 percent of residents are renters, over 50 percent are people of color, the share of very low-income households that are severely rent burdened exceeds the county median, and rent increases are above the county median.

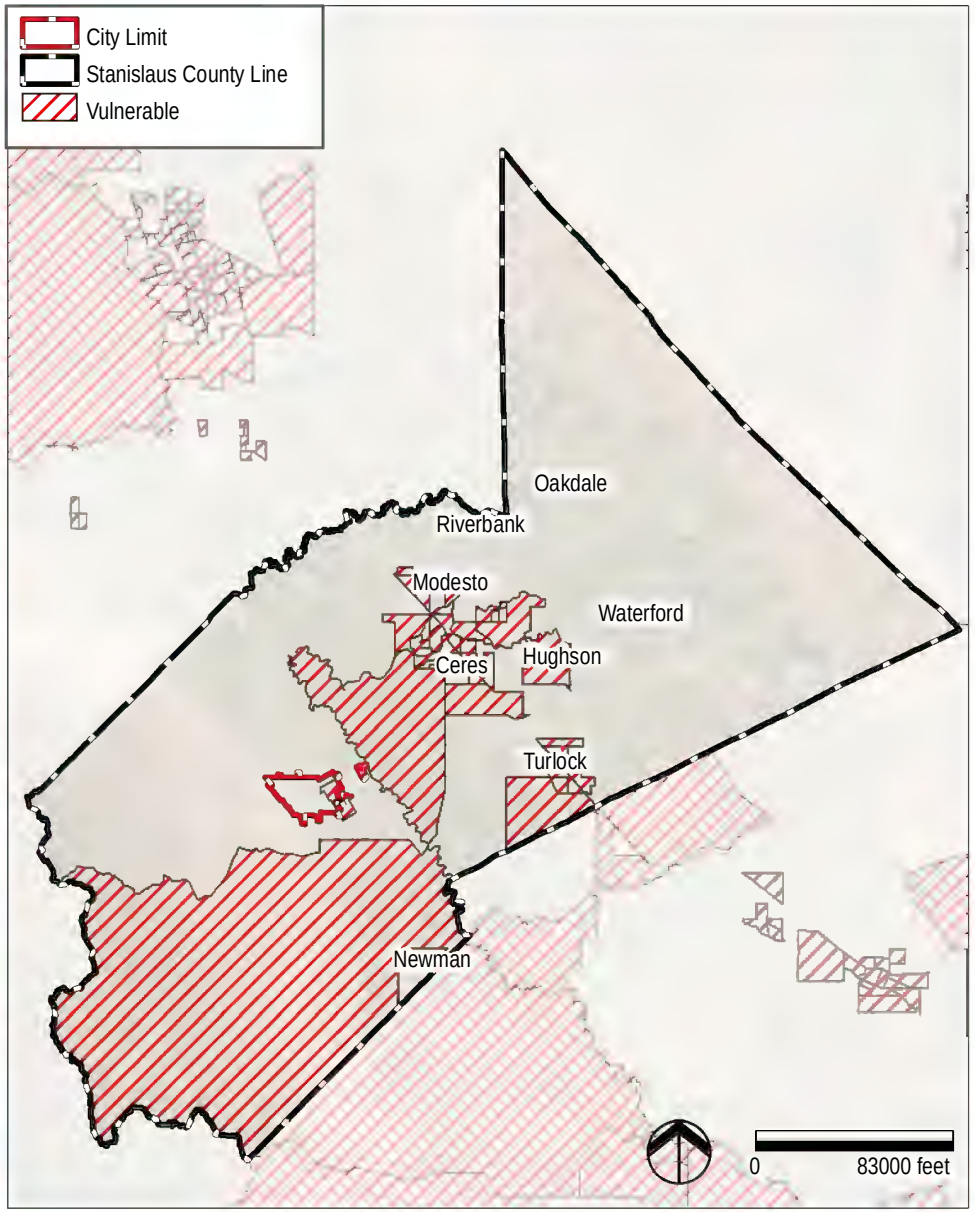
Neighborhoods in the eastern quadrant of Patterson, specifically east of State Route 33, are considered sensitive communities vulnerable to displacement. This area is characterized by lower median household incomes, higher poverty rates, and a greater share of residents with disabilities.

Figure A-22 illustrates displacement risk for very low-income households (0-50 percent AMI) in Patterson, showing that the entire city is classified as having a lower displacement risk. According to the UDP, a lower displacement risk indicates that the loss of low-income households is less than the gain. However, in the eastern quadrants, specifically east of State Route 33, where sensitive communities are located, 61 percent of renter-occupied households experience cost burden and 9 percent experience overcrowding. As previously discussed, this area is characterized by a mix of residential uses, including low-, medium-, and high-density residential. Additionally, the area includes a total of 254 state and federally subsidized deed-restricted affordable rental units. While the City does plan for infrastructure improvements to support equitable access and connectivity and to support future development in this area, these improvements would not result in the loss of any housing units or displace any existing residents. Additionally, the Sites Inventory does not include any housing opportunity sites that would result in displacement.

[24] https://www.urbandisplacement.org/blog/sensitive-communities-in-california-mapping-vulnerability-and-displacement-pressure/



Note: Satellite parcel to the northwest is a part of Zacharias MP Area

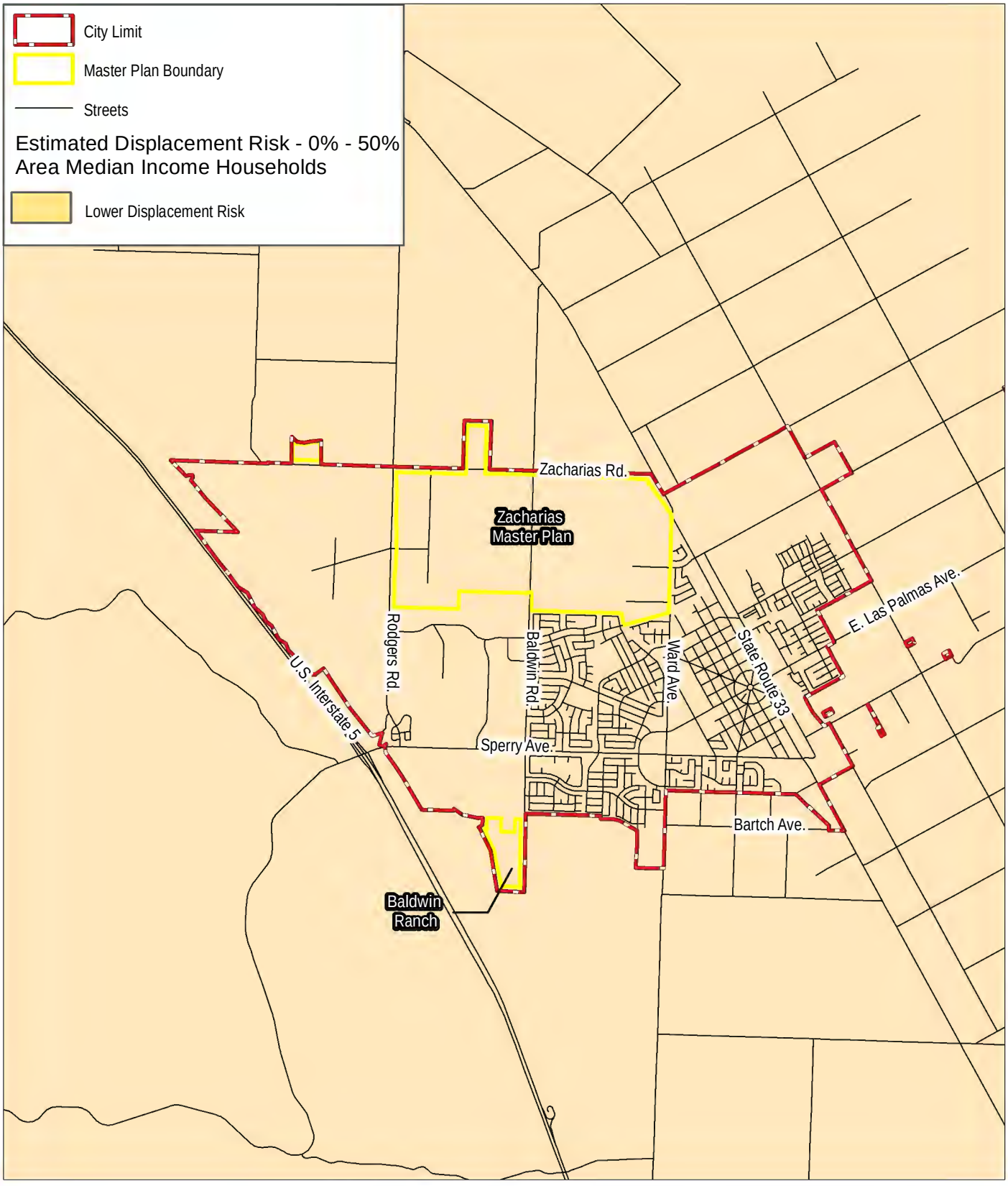


Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-21

Sensitive Communities

City of Patterson 6th Cycle Housing Element



Note: Satellite parcel to the northwest is a part of Zacharias MP Area

Source: Stanislaus County GIS 2024, California HCD 2024

Figure A-22

Estimated Displacement Risk Among Very Low-Income Households

City of Patterson 6th Cycle Housing Element

Localized Perspective

While the UDP designates the city as low-risk for displacement, the combination of inadequate housing and economic stressors suggests that lower-income renters may still face significant displacement risks, warranting targeted mitigation strategies. Specific attention should be paid to the areas located east of State Route 33. To mitigate displacement throughout the city, particularly in areas east of State Route 33, the City is committed to developing a multi-pronged Anti-Displacement Strategy (Program 5.2, see Chapter 3). This strategy will address displacement pressures from the growing income gap and rising housing costs. It will include measures to encourage affordable housing production, preserve existing units, and protect current residents from displacement. These initiatives will be supported by affirmative marketing efforts to ensure lower-income residents are aware of available city assistance.

Further, the City's Inclusionary Housing Ordinance applies to the Villages of Patterson project in the northeastern quadrant of the city, which will include 15 percent deed-restricted lower-income units. This initiative aims to alleviate housing affordability and displacement pressures in this area, where lower-income households are most affected by cost burden, lower median household incomes, and poverty.

The City is not aware of any local events that have led to displacement of Patterson residents, nor is there local knowledge on patterns of eviction. The City recently partnered with Self-Help Enterprises to develop a 138-unit affordable rental apartment, including public amenities to spur affordable housing development in Patterson. The City is committed to continue working with Self-Help Enterprises and other non-profit affordable housing developers to ensure affordable housing is accessible in the City and to mitigate displacement.

A.9 Fair Housing Issues and Contributing Factors

Based on guidance from HUD, contributing factors are those that create, perpetuate, or increase the severity of one or more fair housing issues. To inform the goals, policies, and actions in this Housing Element, the contributing factors are prioritized based on their impact on access to fair housing choice and access to opportunity in Patterson. Contributing factors are analyzed based on outreach and stakeholder input, AFFH analyses, and site inventory.

Fair Housing Issues

Fair housing issues can cause a variety of adverse effects within a locality. Likewise, the manner in which these issues are mitigated or managed can either support the City's residents or cause further harm to the residents, depending on the background and history within the region. Some of the most common fair housing issues include: lack of education and economic mobility, substandard housing conditions, and overall lack of fair housing enforcement.

In the City of Patterson, the following fair housing issues were identified as being the most prominent:

- Disparities in access to economic and educational resources;
- Disproportionate housing needs;
- Segregation within the City; and
- Fair Housing Discrimination.

In order to accurately develop strategies that would be effective in combatting the City's fair housing issues, it is first imperative that the jurisdiction have a close understanding of the factors that have contributed to the fair housing issues to begin with.

Prioritization of Contributing Factors

The disparities in housing choice and access to opportunity discussed above stem from historical actions, socioeconomic factors that limit employment and economic growth, barriers to open housing choice, and limited resources to respond to needs.

While there are several strategies identified to address the fair housing issues, the most pressing issues are the prevalence of poverty, which can impact educational attainment, economic mobility, patterns of concentration of lower-income households, including female-headed households, and higher rates of cost burden. In Patterson, most of the lower-income households are located within the moderate-resource areas, specifically in the area east of State Route 33, where there are higher poverty rates (16.2 percent) and more moderate educational attainment rates. As corrective and mitigative actions, the City has developed a place-based revitalization and fair housing strategies (Chapter 3) to expand access to opportunities and to provide adequate public resources and infrastructure that support the needs of lower-income households.

As a result of the housing needs and fair housing analysis, the City of Patterson has prioritized the following contributing factors to the fair housing issues:

- Limited variety of affordable housing stock (high priority);
- Limited opportunity sites for affordable housing development (high priority);
- Limited financial resources available to low-income households (high priority);
- Fair Housing Discrimination (high priority);
- Lack of fair housing enforcement (medium priority);
- Substandard housing conditions (medium priority);
- Lack of public investment in specific neighborhoods east of State Route 33 (medium priority);

- Lack of City promotion of fair housing resources and outreach (medium priority); and
- Lack of effective programmatic action and City resources (medium priority).

A.10 Fair Housing Goals and Priorities

The City has established goals and actions to address the contributing factors identified in the AFFH analysis. While all contributing factors are considered significant, priority has been given to those that restrict fair housing choice or adversely impact fair housing, as outlined in Government Code Section 65583(c)(10)(A)(iv).

Table A-2 outlines the identified fair housing issues, contributing factors, actions taken to address these factors, and the priority level assigned to each issue. Relevant programs are noted in the action column for each contributing factor, with full program details provided in Chapter 3 of this Housing Element. Table 3-4, Affirmatively Furthering Fair Housing Matrix, in Chapter 3 of this Housing Element includes a comprehensive list of programs that are aimed at affirmatively furthering fair housing. The table summarizes the specific commitment, timeline, geographic targeting, and eight-year metric for each program.

Table A-2 Fair Housing Issues, Contributing Factors, and Programmatic Actions

Identified Fair Housing Issue	Contributing Factor	Programmatic Action	Priority
Disparities in Access to Economic and Educational Resources	▪ Lack of public investment in specific neighborhoods (east of State Route 33); ▪ Limited opportunity sites for affordable housing development; ▪ Fair Housing Discrimination ▪ Lack of City promotion of fair housing resources and outreach	▪ Program 1.1 Provide Adequate Sites for RHNA and Monitoring of No Net Loss ▪ Program 1.5 Inclusionary Housing Requirements ▪ Program 1.6 Affordable Housing Development ▪ Program 5.3 Affirmatively Market Fair Housing Resources ▪ Program 5.4 State and Federal Housing Programs and Funding Opportunities ▪ Program 5.7 Targeted Capital Improvement Program Investment	High
Segregation within the City	▪ Lack of public investment in specific neighborhoods (east of State Route 33); ▪ Limited variety of affordable housing stock; ▪ Fair housing discrimination	▪ Program 1.5 Inclusionary Housing Requirements ▪ Program 4.1: Reasonable Accommodation and Housing for Persons with Disabilities ▪ Program 5.6 Housing Choice Voucher (HCV) Program ▪ Program 5.7 Targeted Capital Improvement Program Investment	High
Disproportionate Housing Needs	▪ Disparities in access to water, sewer, sidewalk infrastructure; ▪ Limited availability of affordable housing options; ▪ Increased homeless population; ▪ Substandard housing conditions	▪ Program 1.6 Affordable Housing Development ▪ Program 2.1 Property Inspection/Code Enforcement ▪ Program 4.2 Universal Design to Encourage Housing for Persons with Limited Mobility ▪ Program 4.5 Family-Friendly Housing ▪ Program 5.7 Targeted Capital Improvement Program Investment	Medium
Fair Housing Discrimination	▪ Limited access to materials in appropriate languages; ▪ Lack of City promotion of fair housing education and resources ▪ Lack of fair housing enforcement ▪ Lack of public investment in specific neighborhoods (east of State Route 33)	▪ Program 2.1 Property Inspection/Code Enforcement ▪ Program 5.2 Anti-Displacement Strategy ▪ Program 5.7 Targeted Capital Improvement Program Investment ▪ Program 5.9 Expanding Economic Mobility	Medium

A.11 Local Data and Knowledge

Zoning Policies

The City's zoning policies discourage single-family development in higher density residential zones, such as Medium Density and High Density Residential zones, by requiring a conditional use permit (CUP) for single-family units. This acts as a deterrent, encouraging the development of higher-density residential uses like apartments or multi-family units in these zones. However, multi-family units are restricted to Medium and High Density Residential Zoning Districts and require a CUP for development in Downtown Residential, Neighborhood Commercial, and Downtown Core Zoning Districts. This effectively limits the development of higher density residential uses in these zones. The City proposes Program 1.10 in this Housing Element to address restrictive zoning policies and promote the development of multi-family housing and mixed-use projects, particularly in downtown and commercial areas located near transit and public services (see Chapter 3). This program aims to increase housing density and create more diverse housing options, supporting a vibrant and inclusive community.

Subsidized Housing

As previously discussed, the City has 254 state and federally subsidized deed-restricted affordable housing units, with 215 located in the eastern quadrant of the city. Of the 254 subsidized units, none are anticipated to expire until 2048 at the earliest. The California Housing Partnership has reported a low level of risk of converting to market rate for each unit. Approximately 2.5 percent of renter-occupied households in Patterson use Housing Choice Vouchers, primarily in the central city area where median incomes are higher. However, data for the eastern quadrant, which has lower income levels, is not available.[25] The site inventory identified housing opportunity sites to accommodate 2,311 lower-income units, which would alleviate some need for subsidized housing.

A.12 Identified Housing Opportunity Sites and Affirmatively Furthering Fair Housing

The Housing Element must show that there are enough appropriately zoned sites to meet the new housing unit needs at each income level identified by the Regional Housing Needs Allocation (RHNA). Within the context of AFFH, site identification involves not only analyzing site capacity to meet RHNA goals but also ensuring these sites help replace segregated living patterns with integrated, balanced communities, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

[25] HUD. AFFH Data Viewer, Housing Choice Vouchers, Tract, 2021

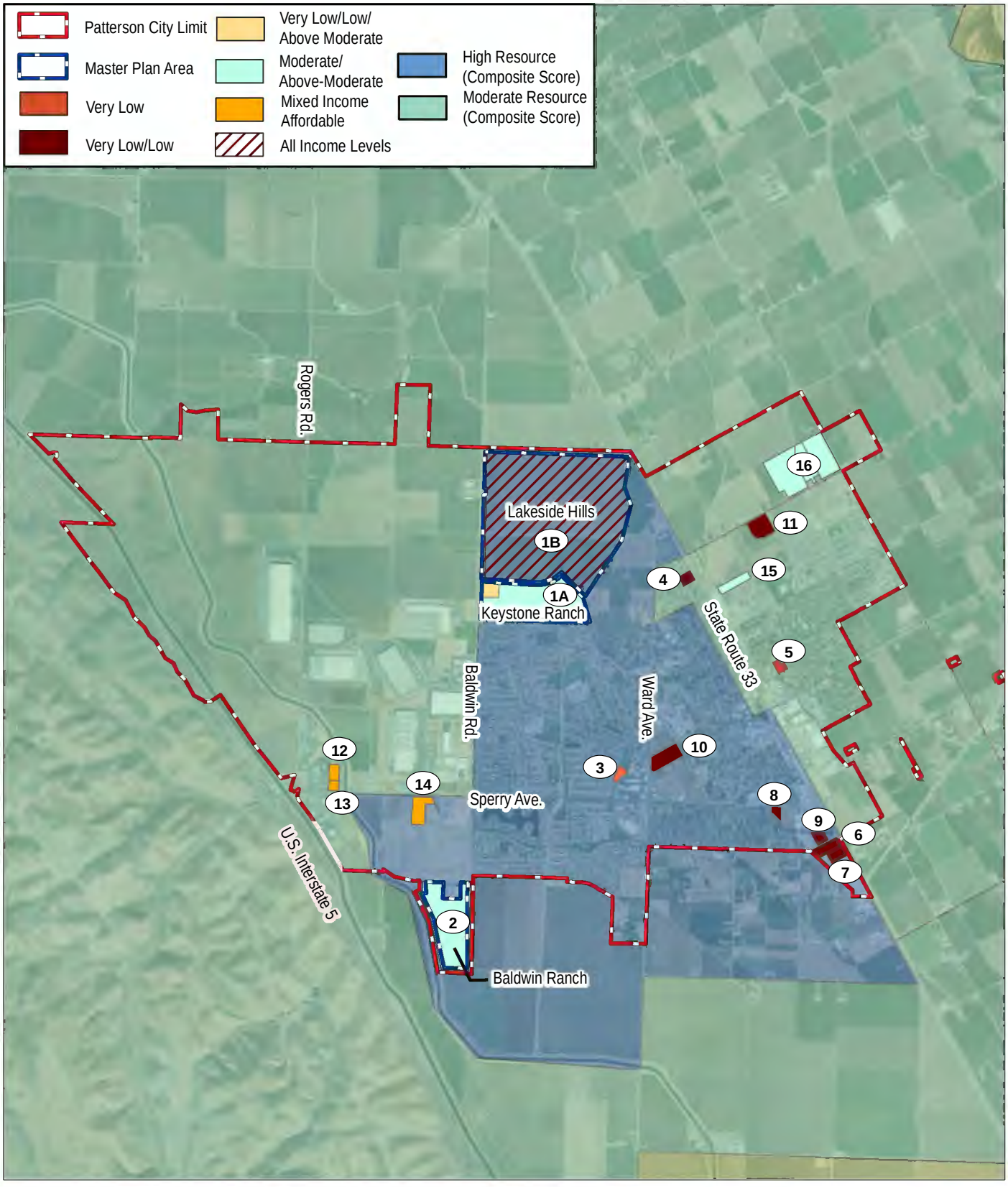
Access to Opportunity

HCD/TCAC opportunity maps identify areas statewide that offer positive economic (low poverty, high employment, high median income), educational (high reading and math proficiency, high graduation rates, low student poverty), and environmental outcomes (low pollution exposure) for low-income families. These maps rank census tracts from High Resource to Low Resource based on these factors. A High Resource designation indicates strong educational and economic opportunities for residents.

Figure A-23 illustrates the location of housing opportunity sites in relation to TCAC/HCD opportunity areas in Patterson. Patterson consists of both High Resource and Moderate Resource Areas. High Resource Areas are centrally located, spanning both the western and eastern quadrants, bordered by Baldwin Road to the west, State Route 33 to the east, Zacharias Road to the north, and Bartch Avenue to the south. Moderate Resource Areas are situated in the eastern quadrant, east of State Route 33, and the western quadrant, west of Baldwin Road. The area west of Baldwin Road is primarily light industrial, with minimal residential use, and thus has little impact on housing.

Housing opportunity sites are evenly distributed throughout Patterson, located in both High and Moderate Resource Areas. These sites were strategically selected to promote mixed-income neighborhoods and increase affordable housing availability near transit, retail, and services, aligning with community and stakeholder feedback. The City's goals, policies, and programs implemented as part of this Housing Element will mitigate impediments to opportunity and promote investment in the downtown, areas east of State Route 33, and areas west of Baldwin Road. Program 5.7 establishes actions the City is committed to taking to ensure targeted investment in these areas (see Chapter 3).

Table A-3 outlines the distribution of housing opportunity sites throughout the city, categorized by income level and AFFH indicators. This distribution helps ensure that housing opportunities are balanced across different income groups and resource areas, promoting mixed-income neighborhoods and improving access to affordable housing in alignment with fair housing goals. By categorizing sites according to these criteria, the table aids in understanding how the city's housing strategy addresses economic integration and fair access to housing.



0 3150 feet

Source: ESRI 2024, Stanislaus County GIS 2024

Figure A-23

Distribution of Site Inventory by Income Designation and Opprtunity Areas

City of Patterson 6th Cycle Housing Element

Table A-3 Distribution of Housing Opportunity Sites by Quadrant, City of Patterson

Site ID	Project Name/APN	RHNA Capacity					AFFH Indicators						
		Total	VL	L	M	AM	Median Household Income	Predominant Race	Poverty Level	TCAC/HUD Opportunity Area	Cost Burden Renter	Cost Burden Owner	Over-crowding
Northwestern Quadrant													
1A	Keystone Ranch	67			10	57	$94,100	Hispanic/Latino	2%	High Resource	22%	49%	11%
		92			12	80							
		94			10	84							
		38			10	28							
		93			10	83							
		119			12	107							
		216	17	26		173							
1B	Lakeside Hills	84			10	74							
		90			10	80							
		88			10	78							
		96			10	86							
		57				57							
		101			10	91							
		108			10	98							
		73				73							
		85			10	75							
		125			15	110							
		128			15	113							
		99			10	89							
		85			10	75							
		81			10	71	$94,100	Hispanic/Latino	2%	High Resource	22%	49%	11%

Site ID	Project Name/APN	RHNA Capacity					AFFH Indicators						
		Total	VL	L	M	AM	Median Household Income	Predominant Race	Poverty Level	TCAC/HUD Opportunity Area	Cost Burden Renter	Cost Burden Owner	Over-crowding
		64				64							
		75				75							
		40				40							
		66				66							
		95			10	85							
		79				79							
		88			10	78							
		107			10	97							
		232	150	62	20								
		90	70	20									
		26	15	11									
		27	17	10									
		31	21	10									
		35	10	10	15								
		66	21	12	33								
		43	10	21	12								
		57	25	12	20								
-	Lakeside Hills ADUs	263	79	79	79	26							
3	021-040-055	16	16				$86,779		9%	High Resource	60%	46%	9%
12	021-028-007	68	24	24	20		$81,895		7%	Moderate Resource	36%	47%	4%
13	021-028-008	41	15	14	12								
Subtotal		3,628	490	311	435	2,392							
Net RHNA %		102%	43%	38%	88%	216%							

Site ID	Project Name/APN	RHNA Capacity					AFFH Indicators						
		Total	VL	L	M	AM	Median Household Income	Predominant Race	Poverty Level	TCAC/HUD Opportunity Area	Cost Burden Renter	Cost Burden Owner	Over-crowding
Southwestern Quadrant													
2	Baldwin Ranch South MP	305			91	214	$104,783	Hispanic/Latino	<10%	High Resource	14%	49%	8%
-	Baldwin Ranch South MP ADUs	32	10	10	10	2							
14	021-098-003	171	60	60	51								
Subtotal		508	70	70	152	216							
Net RHNA %		14%	6%	9%	31%	19%							
Northeastern Quadrant													
4	047-024-024	79	43	36			$60,461	Hispanic/Latino	16%	Moderate Resource	60%	42%	9%
5	047-034-035	60	60										
10	048-048-007	283	155	128									
11	047-031-062	256	128	128			$86,779		7%	High Resource	23%	14%	5%
Subtotal		678	386	292	0	0							
Net RHNA %		19%	34%	36%	0%	0%							
Southeastern Quadrant													
6	048-042-001	156	79	77			$104,783	Hispanic/Latino	<10%	High Resource	14%	49%	8%
7	048-042-008	113	58	55									
8	048-043-002	59	29	30									
9	048-043-015	72	36	36									
Subtotal		400	202	198	0	0							
Net RHNA %		11%	18%	24%	0%	0%							

Site ID	Project Name/APN	RHNA Capacity					AFFH Indicators						
		Total	VL	L	M	AM	Median Household Income	Predominant Race	Poverty Level	TCAC/HUD Opportunity Area	Cost Burden Renter	Cost Burden Owner	Over-crowding
Total		5,214	1,148	871	587	2,608							
Projected ADUs		50	15	15	15	5							
Grand Total		5,264	1,163	886	602	2,613							
Adjusted Net RHNA		3,571	1,144	822	497	1,108							
% of Net RHNA		147%	102%	108%	121%	236%							

SOURCE: City of Patterson, 2024; HCD AFFH Data Viewer, 2024

Improved Conditions

Northwest Quadrant

The northwestern quadrant, located north of Sperry Avenue and west of Ward Avenue, is planned to accommodate 3,628 new residential units, including 801 lower-income units, 435 moderate-income units, and 2,392 above-moderate-income units. These units are distributed across sites 1A, 1B, 3, 12, and 13, with sites 1A and 1B accounting for approximately 96 percent of the planned units in this quadrant. This is possible due to the inclusion of the Zacharias Master Plan Area, a newly annexed 1,296.4-acre area. The Zacharias Master Plan is planned to provide 708 lower-income units, fulfilling 36 percent of the City's lower-income net RHNA, including the unaccommodated need of 196 lower-income units from the 5th cycle. Overall, the northwest quadrant is planned to accommodate approximately 41 percent of the City's lower-income net RHNA.

The northwestern quadrant is primarily characterized by low-density residential uses, bounded by Baldwin Road to the west, Rose Avenue to the north, and Ward Avenue to the east, with light industrial uses dominating west of Baldwin Road. The Zacharias Master Plan introduces medium- and high-density residential uses, extending north of Rose Avenue. This area is designated a High Resource Area, characterized by higher median incomes and lower housing needs disparities. The Master Plan Area features planned parks, commercial centers providing employment opportunities, and public schools. The City Manager and Mayor regularly meet with the Stanislaus Regional Transit Authority (StanRTA) to explore expansion opportunities and enhance existing transit stops. With the development of the Master Plan Area, discussions will also focus on integrating the Master Plan Area into the city's transit network, with priority given to connections between the area and downtown.

The City's higher density residential land uses are primarily concentrated in the northeastern quadrant, east of State Route 33, designated as moderate resource areas with lower median incomes and higher poverty rates. Introducing medium- and high density residential uses in the northwestern quadrant would promote balanced growth, offering affordable housing near new public services, amenities, and infrastructure. This approach would also help mitigate existing and future segregated development patterns.

Southwest Quadrant

The southwestern quadrant, located south of Sperry Avenue and west of Ward Avenue, is planned to accommodate 508 new residential units, including 140 lower-income units, 152 moderate-income units, and 216 above-moderate-income units. These units are distributed across sites 2 and 14 with site 2 accounting for approximately 66 percent of the planned units in this quadrant. This is possible due to the inclusion of the Baldwin Ranch South Master Plan Area, a 66-acre area planned for medium density residential and park uses. The Baldwin Ranch South Master Plan area is planned to provide 91 moderate-income and 214 above moderate-income units. Additionally, the City is

anticipating the development of at least 32 ADUs with the development of single-family residences. This assumption is based on community and developer interest, as well as City actions to facilitate ADU construction. Overall, the southwest quadrant is planned to accommodate approximately 7 percent of the City's lower-income net RHNA, including the unaccommodated need of 196 lower-income units from the 5th cycle.

The southwestern quadrant includes low- and medium-density residential, park, commercial, light industrial, and public/quasi-public uses. Low-density residential uses are concentrated between Baldwin Road and Ward Avenue, while the Baldwin Ranch Master Plan introduces medium-density uses west of Baldwin Road. This area is a designated High Resource Area east of Annamarie Avenue and designated a Moderate Resource Area west of Annamarie Avenue.

Development of the Baldwin Ranch Master Plan Area is expected to revitalize the western quadrant generally, as the majority of land west of Baldwin Road is currently used for light industrial purposes. The City plans to use CIP funds to prepare this area for residential development. Working closely with local developers, including Lennar, LGI, and DR Horton, the City has initiated development in the Baldwin Ranch North development area bordered by Niels Hanson Road to the west, Sperry Avenue to the north, and Baldwin Road to the east. These developments will feature single-family homes and ADUs with various floor plans to meet the needs of different household types. The Baldwin Ranch South development area (site 2) is anticipated to begin development in Summer 2025.

The single-family homes in the southwestern quadrant will pave the way for affordable multi-family housing via mixed-use developments adjacent to the north side of the Baldwin Ranch Master Plan and the areas currently being developed by Lennar, LGI, and DR Horton. Over the next eight years, this area will undergo significant revitalization through CIP investment, resulting in a balanced neighborhood with single-family homes, ADUs, multi-family units, parks, and commercial uses.

Northeast Quadrant

The eastern quadrants of the city, east of Ward Avenue, are characterized by older residential and commercial uses and includes a concentration of 254 subsidized deed-restricted affordable rental units. Historically, the City has prioritized annexing new lands for development, but more recently, efforts have shifted toward reinvesting in the City's east side through infill development. Local developers, including KB Homes and Self-Help Enterprises, have been instrumental in driving this change. In 2021, Self-Help Enterprises completed a 138-unit deed-restricted affordable rental apartment building with community amenities, and KB Homes is currently constructing Sycamore Ranch Phase 1, which includes single-family homes.

This new development is expected to generate additional interest in the area, prompting further residential development and investment. With an increasing focus on revitalizing the eastern quadrant, future developments are likely to enhance access to resources, improve infrastructure, and

create a more balanced and vibrant community. These improvements will address current deficiencies, such as limited access to services and amenities, while fostering long-term growth and enhancing the quality of life for residents in the eastern region.

Specifically, the northeast quadrant, located north of Sperry Avenue and east of Ward Avenue, is planned to accommodate 678 new lower-income residential units, including 386 very low-income units and 292 low-income units. This fulfils approximately 34 percent of the City's lower-income net RHNA, including the unaccommodated need of 196 lower-income units from the 5th cycle. These units are distributed across sites 4, 5, 10, and 11.

The northeast quadrant features a mix of low, medium, and high-density residential uses, along with commercial and public/quasi-public uses, supporting lower-income housing due to its proximity to amenities, transit, and public services. This quadrant currently includes 254 subsidized housing units and is currently seeing new single-family development, driving infrastructure investment in a historically underserved region.

This quadrant experiences higher rates of poverty, lower median household incomes, and greater housing cost burdens among renters and overcrowding compared to other areas of the city. Expanding affordable housing opportunities in this quadrant aims to address these disparities by providing more equitable access to safe, quality housing options for lower-income households. This effort seeks to alleviate high rates of poverty, reduce cost burden, and improve living conditions, ultimately fostering a more balanced and inclusive community. By meeting existing housing needs and creating opportunities for new development, the City aims to enhance the quality of life for residents in the northeast quadrant, while promoting long-term economic and social stability citywide.

Southeast Quadrant

The southeast quadrant, located south of Sperry Avenue and east of Ward Avenue, is planned to accommodate 400 new lower-income residential units, including 202 very low-income units and 198 low-income units. This fulfils approximately 20 percent of the City's lower-income net RHNA, including the unaccommodated need of 196 lower-income units from the 5th cycle. These units are distributed across sites 6, 7, 8, and 9.

The southeast quadrant is predominantly characterized by low-density residential uses and some commercial. Vacant commercial parcels are proposed to be rezone to accommodate residential uses. This initiative seeks to integrate affordable housing into an area primarily dominated by single-family homes. As a designated High Resource area—marked by higher median household incomes and low poverty rates—the inclusion of lower-income housing is intended to foster a more balanced urban fabric and ensure equitable access to housing opportunities within well-resourced neighborhoods.

Summary

The City's focused revitalization efforts in both the western and eastern regions underscore its commitment to improving access to resources and expanding housing opportunities citywide. These initiatives also play a key role in helping the City meet its lower-income RHNA goals, ensuring a balanced approach to growth and development that supports all income levels.

Exacerbated Conditions

The City has identified sites for lower-income housing on vacant properties in the eastern quadrant, specifically east of State Route 33. This area has higher percentages of Hispanic/Latino populations, a higher concentration of lower-income residents, and higher poverty rates with fewer economic opportunities compared to the western quadrant. However, these lower-income housing sites are near transit, retail, and other services, offering affordable options to existing residents, helping to reduce displacement risk. The addition of affordable multi-family housing addresses the current need in this area. Lower-income units are also planned for the western quadrant, west of Ward Avenue, to promote mixed-income neighborhoods. Thus, the site inventory supports balanced development without worsening conditions in vulnerable areas.

To address economic mobility challenges in the eastern quadrant, the City is committed to a place-based strategy that focuses on increasing economic opportunities and providing educational and job-readiness training for lower-income residents. This approach aims to help residents secure stable employment, enhancing economic stability and housing security. Additionally, the City's Capital Projects Division has identified several infrastructure improvements, targeting both the eastern and western regions to enhance essential infrastructure and improve accessibility and connectivity to employment centers across the city.

Racially/Ethnically Concentrated Areas of Poverty and Affluence

While Patterson has no R/ECAPs or RCAAs by HUD's definition, some tracts in the northeast quadrant, east of State Route 33, have higher percentages of Hispanic/Latino populations and higher poverty rates. This area will accommodate approximately 678 lower-income units.

In the northwest and southwest quadrants, within High Resource Areas characterized by higher median incomes, a higher percentage of White residents, and lower poverty rates, approximately 941 lower-income and 587 moderate-income units are anticipated for development. This distribution of sites promotes a balanced residential environment by mitigating the concentration of populations based on race and income level.

Disproportionate Housing Needs

As illustrated in Figure A-19, the percentage of cost-burdened renter-occupied households in Patterson varied significantly by location, ranging from less than 20 percent to as high as 61 percent. In contrast, the rate of cost-burdened owner-occupied households was relatively consistent across the city, with the exception of areas that are newly annexed (Zacharias Master Plan and Baldwin Ranch Master Plan areas), averaging around 33 percent. Household overcrowding in Patterson also varied geographically, but averaged approximately 8 percent. While all neighborhoods in Patterson are considered to have a lower displacement risk, the northeast quadrant is identified as a sensitive community. The combination of inadequate housing and economic stressors indicates that lower-income renters may still face significant displacement risks. The fair housing assessment highlights the need for more affordable housing, better protection against displacement, and permanent housing for the homeless. The Site Inventory includes locations for lower-income housing across the city and avoids areas with existing housing units to minimize displacement risks (see Chapter 4). Further, the City has developed Program 5.2 establishing an Anti-Displacement Strategy with specific actions the City is committed to (see Chapter 3).

Summary

The City's revitalization efforts in both the eastern and western regions demonstrate a strong commitment to improving housing access and resources citywide. In the northeast quadrant, where there are higher concentrations of lower-income households and housing issues, approximately 678 lower-income units are planned, representing 34 percent of the City's lower-income net RHNA. Recent developments by Self-Help Enterprises and KB Homes have spurred further interest in this area, and future developments are expected to contribute to enhanced infrastructure and services.

Similarly, broader investment in the northwest and southwest quadrants will drive revitalization, with the planned development of 941 lower-income units helping to create a more balanced community in an area currently characterized by higher-income households and less housing disparity. New master-planned communities, such as the Zacharias and Baldwin Ranch Master Plan Areas, will contribute thousands of housing units across various income levels, fostering mixed-income neighborhoods.

The City's balanced development strategy further supports equity by dispersing affordable housing throughout the city, rather than concentrating it in specific areas. With planned infrastructure improvements and a focus on economic opportunities, the City's place-based strategies are designed to address existing challenges while minimizing displacement risk. These efforts aim to create a more balanced residential environment and help the City achieve its housing goals. Chapter 3 of this Housing Element includes a suite of programmatic actions aimed to affirmatively further fair housing citywide (Table 3-5).

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Review of 2015-2023 Housing Element

B

APPENDIX

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APPENDIX B REVIEW OF 2015-2023 HOUSING ELEMENT B-1

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B.2 Effectiveness in Meeting Special Needs B-1

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Table B-1 Review of 5th Cycle Housing Element Policies and Programs B-3

Appendix B
Review of 2015-2023 Housing Element

B.1 Introduction

In order to effectively plan for the future, it is important to reflect back on the goals of the previous Housing Element and to identify those areas where progress was made and those areas where continued effort is needed. State Housing Element guidelines require communities to evaluate their previous Housing Element according to the following criteria:

- Effectiveness of the Element;
- Progress in implementation; and
- Appropriateness in Goals, Objectives and Policies.

B.2 Effectiveness in Meeting Special Needs

During the update of the 5th Cycle Housing Element, the City of Patterson committed to enact various programs that targeted some of the special needs populations, and not all. The City acknowledges that these policies and programs were not comprehensive, and inclusive of all of the special needs groups. However, the 6th Cycle Housing Element includes policies and programs that are designed to increase access to affordable housing options for all special needs groups, including: ELI residents and households, seniors, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness. Many of these policies and programs from the 5th cycle were supportive in nature, with the intent to support the County or other service providers and community organizations in their efforts to address the needs of the protected groups. As such, the effectiveness most of the 5th cycle policies and programs is subjective, and difficult to be measured.

In an effort to affirmatively further fair housing and provide measurable impact for special needs groups during the 6th Cycle Housing Element and beyond, the City of Patterson has committed to using programmatic action as a means to facilitate affordable housing construction, increase housing mobility and choice, and connect the community to much needed housing and social service resources. The policies and programs that fall under Goal 4 in Chapter 3, Housing Action Plan, of the Housing Element are specifically designed to meet the needs of households that fall into any of the "special needs" categories. Through programmatic actions such as zoning code amendments,

community engagement and outreach, fee reductions, downpayment assistance, and other initiatives, the City aims to fill in the gaps that were present after the 5th Cycle Housing Element update, and continuously monitor the effectiveness of 6th cycle policies and programs through quantified objectives, mid-cycle reviews, and discrete timelines.

Table B-1 assesses the implementation status and effectiveness of the City of Patterson's 5th Cycle Housing Element policies and programs. It also identifies necessary modifications to enhance their effectiveness and specifies whether each program will be retained or discontinued.

Table B-1 Review of 5th Cycle Housing Element Policies and Programs

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-1.1: The City shall ensure an adequate supply of residentially zoned land at sufficient densities is available to accommodate its fair share of existing and future housing needs.			
H-1.A: Rezone Program	The City shall rezone enough land to accommodate the remaining housing need of 496 lower-income units within two years of adoption of the Housing Element. Rezoned sites may include those identified in the Rezone Program section in the Housing Element, or will include other sites that provide at least the same capacity. Consistent with Government Code Section 65583.2(h), the City shall ensure that the rezoned sites are large enough to accommodate a minimum of 16 units per site, will permit owner-occupied and rental multifamily residential uses by-right (without a conditional use permit, planned unit development permit, or other discretionary action), and that at least 50 percent of the remaining need will be accommodated on sites zoned for exclusively residential uses. The zone shall allow residential development at an intensity of at least 20 dwelling units per acre.	In 2020, the City rezoned 13 acres located at Weber Avenue and First Street to High Density Residential to accommodate approximately 300 units.	Modify This program was moderately effective, meeting approximately 60 percent of rezoning efforts. The remaining shortfall of 196 lower-income units is being accommodated in the Site Inventory in Chapter 4. The City has re-committed existing staff capacity and resources. Additionally, the City is adding a new staff position to focus on all housing needs, including rezoning efforts to ensure no net loss. The City has included Program 1.1 to ensure that adequate sites are available for rezoning to meet the 6th cycle RHNA.
H-1.B: Vacant Land Inventory	The City shall continue to maintain an inventory of vacant residentially-zoned parcels and associated development potential and a list of recently approved residential projects to assist developers in identifying land suitable for residential development. To ensure adequate sites are available throughout the planning period to meet the City's RHNA, the City shall continue to annually update the inventory. The City shall continue to make this information available to the public and developers through the City's website.	The City successfully updated the vacant land inventory annually during the 5th cycle. The inventory was updated to include the recently annexed Baldwin Zacharias Master Plan area.	Continue This program was effective and will be continued in Chapter 3 of the Housing Element (Program 1.1).

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
H-1.C: Lot Consolidation	The City shall encourage and, based on available resources, facilitate the consolidation of vacant and underutilized lots for residential development, especially those identified in the Sites Inventory in order to develop vacant and underutilized lots to their fullest potential. The City will evaluate the appropriateness of a variety of incentives and provide this information to the developers, owners, and other interested parties through the City's website and/or print material at City Hall.	No lot mergers/consolidations took place during the 5th Cycle due to a lack of developer incentives and developer interest.	Modify Due to limited staff capacity and funding, the program was not implemented during the 5th Cycle. However, as included in Program 1.6, the City is committed to facilitating the development of affordable housing during the planning period, and plans to hire a dedicated staff to focus on housing issues and needs. This program has been modified to include specific actions the City will take to facilitate lot consolidation to fulfill the lower-income RHNA. This program is now called Program 1.3 (see Chapter 3).
H-1.D: City-Owned Land	The City shall develop and maintain a database of all City-owned land, particularly surplus land, for opportunities to rezone, where appropriate, for affordable housing development.	The City uses a GIS database for site tracking, and the Public Works Department maintains a list of these City-owned sites	Modify This program has been expanded and modified to build a more robust database for tracking City-owned lands (Program 1.1) in the Housing Action Plan (Chapter 3).
H-1.E: Second Units	The City shall, based on available staff resources, develop and maintain information on the City's website and at City offices (e.g., brochures) about the development of second family units in existing and new single-family residential developments.	The City has a guideline and checklist for ADUs, and the City provides the County's pre-approved plans and brochures for ADU information to interested residents	Modify in the following ways: 1) The City will include a program to update the Municipal Code to comply with ADU legislation; 2) The City will include ADU information on City website; and 3) ADU info will be incorporated into the Building Codes.

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-1.2: The City shall encourage development of a range of housing types affordable to various income groups, including single family **and multifamily dwellings, "move-up" housing,** senior housing, secondary and other smaller units, and special needs housing.			
N/A			
Policy H-1.3: The City shall monitor the amount of land zoned for all types of housing and initiate zone changes, as necessary, to ensure an appropriate mix of housing types			
N/A			
Policy H-1.4: The City shall encourage the development of multi-family housing throughout the city, especially in locations near transit stops, shopping and services, and schools.			
N/A			
Policy H-1.5: The City shall encourage residential projects to develop at the higher end of the allowable density range.			
N/A			
Policy H-1.6: **Consistent with "no-net-loss" density provisions contained in Government Code Section 65863, the City shall consider the potential impact on the City's ability to meet its share of the regional housing need when reviewing proposals to downzone re**sidential properties, reclassify residentially-designated property to other uses, or develop a residential site with fewer units than what is assumed for the site in the Housing Element sites inventory.			
N/A			
Policy H-1.7: The City shall encourage the development of second family units in existing and new single-family residential developments.			
N/A			
Policy H-1.8: The City shall encourage development of well-planned and designed projects that provide for the development of compatible residential, commercial, industrial, institutional, open space, or public uses within a single project or neighborhood.			
N/A			
Policy H-1.9: The City shall ensure the development of housing has, to the extent possible, easily accessible shopping, services, transit, parks and open space, schools, and jobs.			
N/A			

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-2.1: The City shall strive to conserve the existing housing stock, including existing rental housing that is affordable to lower- and moderate- income households an affordable housing that is at-risk of being converted to market rate housing.			
N/A			
Policy H-2.2: The City shall impose long-term restrictions on the maximum rents and sale prices of affordable housing that is developed with City assistance as well as inclusionary units provided by private developers.			
N/A			
Policy H-2.3: The City shall continue to apply to HUD and HCD for grant funds for the development of affordable housing and provision of housing-related programs.			
H.2.A: New Funding Sources	The City shall work to secure additional funding from State, Federal, and regional sources and support applications for funding that can be used to help increase the supply of affordable housing in Patterson. The City shall review NOFAs annually to determine the City's eligibility and competitiveness for grant funding. Based on available staff resources, funding availability, and expected competitiveness, the City shall prepare and submit one or more funding applications on an annual basis. Such programs may include, but are not limited to: • HUD Section 811 funding for supportive housing for extremely low-income residents; • HCD Local Housing Trust Fund Program; • The state Infill Infrastructure Grant program, sponsored by the Department of Housing and Community Development (HCD); and • The state Multifamily Housing Program (MHP), sponsored by HCD. • The City shall also identify Community Development Block Grant (CDBG), City revolving bond funds, and other sources of funding to assist with the purchase of land for affordable housing. (New Program, Consultants, replaces similar program)	The City is an entitlement community, and receives CDBG and HOME grants from the Stanislaus County Block Consortium.	Continue This program has been effective in that it provided funding to the Disability Resources Agency for Independent Living (DRAIL) program and other programs for special needs populations serving approximately 200 residents.

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-2.4: The City shall use techniques such as mortgage revenue bonds or other mortgage-backed securities to assist in the development of affordable ownership and rental housing.			
N/A			
Policy H-2.5: The City shall assist developers, nonprofit housing developers, and other qualified private sector interests in pursuing and applying for Federal, State, NGO, and private financing and grants for the development of affordable housing.			
N/A			
Policy H-2.6: The City shall facilitate partnerships between non-profit and for-profit housing developers to encourage affordable housing production.			
H-2.B: Meetings with the Development Community	The City shall conduct annual meetings with the development community to publicize available incentives and housing programs, such as the density bonus ordinance, and foster partnerships between for-profit and non-profit developers.	Not much discussion has taken place with developers throughout the 5th Cycle due to the Covid-19 pandemic and lack of developer interest; however, City staff met with developers, in 2024, to discuss transitional housing.	Continue The City has expanded this program in the Housing Action Plan to include information on public outreach to developers (Programs 1.6 and 5.3).
H-2.D: Regulatory and Financial Incentives	The City shall coordinate with affordable housing developers to develop regulatory and financial incentives for the development of extremely low-income housing. The City will annually identify its eligibility and competitiveness for grant funding, and shall pursue or support funding and grant applications to encourage and assist in the development of SROs and/or other housing types consistent with existing City standards and State law. Based on available staff resources, interest from developers, funding availability, and expected competitiveness, the City shall prepare and submit one or more applications on an annual basis	In 2024, the City staff discussed financial incentives and site locations with the following developers for transitional housing: - DignityMoves.org - Hope House	Continue This program was moderately effective during the 5th cycle due to limited coordination with developers that took place due to the Covid-19 pandemic and limited staffing. The City will include updated developer resources on the City's website and continue to meet proactively with the development industry.
Policy H-2.7: The City shall allocate funds from available sources to the first-time homebuyer program.			
H-2.C: First Time Homebuyer Down Payment Assistance	The City shall use HOME funds or alternative funding sources to assist with first time homebuyer down payment assistance scaled to current economic conditions for each qualified household as determined by the City Council. The City shall annually determine households eligible for homebuyer down payment assistance, with	City staff has publicized the HOME funds that is available, but due to the current housing market conditions (rising prices), the program had limited appeal.	Modify This program was limited in effectiveness during the 5th cycle due to the gap in the amount of CPA funding available and rising housing costs within Patterson. This program

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
	a goal of assisting four households per year, based on available staff resources and funding.	The biggest concern for the City is that most home prices in Patterson are unaffordable to residents. A gap exists between what is affordable despite City's financial assistance for low-income households. Therefore, the Down-payment assistance that the City offers to residents is not sufficient to offset the high costs of housing.	has been modified and updated in the Housing Action Plan (Chapter 3) in order to reach potential applicants.
Policy H-2.8: In accordance with the provisions of State law, the City shall encourage the use of density bonuses for qualifying projects to facilitate the development of affordable and senior citizen housing.			
H-2.E: City Incentives	To preserve affordability, the City shall provide incentives such as density bonus units, fee reductions, fee deferral, and fast-tracking to developers of residential projects who agree to enter into a long-term contract to provide the specified percentage of units mandated by State law at a cost affordable to extremely low-, very low-, and/or low-income households. The City shall strive to create 100 affordable housing units by 2023 through the aforementioned activities, subject to availability of staff resources and funding and subject to developer interest, In addition, the City shall annually review its zoning and permit processing procedures, and may propose changes to the City Council based on prudent fiscal planning and staff availability, to assist in reducing housing costs and average permit processing time.	The City provided fee reductions and waivers for low-income apartments;	Continue This program was effective. The Stonegate Village Project was developed by Self Help Enterprises. Self Help Enterprises developed 66 affordable units with a density bonus, and parking reductions, which the City facilitated and approved.
Policy H-2.9: The City shall provide information to Patterson residents about affordable housing programs and opportunities.			
H-2.F: Project Information Booklet	The City shall prepare a Project Information Booklet outlining City participation and incentives, housing needs from the Housing Element (or other market source), a definition of the State and Federal funding for which the City is willing to apply, and other pertinent information. The City shall distribute the booklet to local, regional, and national non-profit and for-profit development groups and regional agencies.	The City has brochures posted on the City website and in City Hall. Information regarding the Down-payment Assistance and Minor Repair Program has been posted online.	Continue This program was effective, and has been expanded to include an "Affirmative Marketing" strategy for public outreach (Program 5.3).

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
H-2.G: Section 8 Housing Assistance	The City shall continue to collaborate with the Stanislaus County Housing Authority to qualify city residents for Section 8 housing assistance. The City shall provide information on the availability of Housing Authority programs to qualified residents.	11 Housing Choice Vouchers were issued and used for a senior complex within the City of Patterson	Continue This program is being continued as the Housing Choice Voucher program in the Housing Action Plan (Chapter 3). The program has been effective, and the City continues to refer individuals to the Stanislaus County HCV program. The County continues to have a long waitlist for the program, but it is effective for those in need of rental assistance.
Policy H-2.10: The City shall encourage sweat equity programs (allowing buyers to contribute labor hours to lower housing costs) for the construction of homes for first-time homebuyers.			
N/A			
Policy H-2.11: The City shall encourage the construction of affordable units with three or more bedrooms to accommodate the needs of large households.			
N/A			
Policy H-2.12: The City shall continue to allocate staff resources to pursuing partnerships that result in the development of affordable housing.			
N/A			
Policy H-3.1: The City shall prioritize the development of housing that meets the needs of extremely low-income residents and special needs groups, including: seniors, person with disabilities, single female-headed households with children, large families, farmworkers, and the homeless.			
H-3.A: Development of Housing for Persons with Disabilities	The City shall conduct annual meetings with developers of supportive housing to encourage development of projects targeted to persons with disabilities, including developmental disabilities. Support applications for County, State, and Federal funding for housing construction and rehabilitation for persons with disabilities, including developmental disabilities.	City collaborates with local non-profit; part of allocation for public service grants received are distributed to the non-profit (DRAIL).	Continue The City has included a program for Universal Design and to encourage construction of multi-family and accessible units for Seniors and/or residents with disabilities. The Stanislaus HOME Consortium and Urban County assisted approximately

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
			802 individuals with disabilities with emergency food, shelter, and/or utility assistance.
H-3.B: Disabled-Access Units	The City shall enforce Building Code requirements for the inclusion of adaptable disabled accessible units in multifamily development projects that are subject to such requirements.	The City has enforced building code requirements, for ADA accessible units in multi-family development projects	Continue The City has effectively enforced the Building Codes, therefore a number of accessible units have been constructed. To further increase accessibility, the City will adopt Universal Design Guidelines for Senior units (Program 4.2)
H-3.C: Incentives for Large-Family Housing	The City shall coordinate with developers and non-profit developers to develop regulatory and financial incentives to encourage the development of multi-family housing, including larger units (i.e. 3-4 bedrooms).	The City has successfully implemented the following incentives: - Adjusted fees so there is a reduction per unit for multi-family development completed in 5th cycle - Density bonuses - Parking Reductions A recent development constructed multi-generational suites to include full bathrooms and bedrooms on the ground floor, and ADUs with single-family development. Lennar Homes is constructing a variety of homes of up to 5 bedrooms with a mixture of single floor and two-story homes within the City of Patterson.	Continue Stonegate Village had a mix of bedroom sizes including: 22 (3-bedroom) units oriented towards larger families along with family-friendly amenities (i.e. playground, computer room, etc.) The incentives utilized for this development included Density Bonus and Parking Reduction.
H-3.D: Las Palmas Senior Apartments	The City shall support the Stanislaus County Housing Authority's plans for the 16-unit expansion of the Las Palmas Senior Apartments with the use of CDBG, HOME, and other available funding.	For this program, the City of Patterson sought to build on the previous development work that took place during initial phase of construction of the Las Palmas Senior Apartments.	Continue The program was effective – as City staff have been in discussion with the Stanislaus Regional Housing Authority,

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
		While no further construction took place during the 5th Cycle, City staff has been in contact with developers and the regional Housing Authority regarding initiating phase 2 of the development.	Stanislaus County, and the City of Turlock regarding Phase 2 of the project (16 units). City staff awaits the site plan and additional funding. The City has included Program 4.4 in Chapter 3 of the Housing Element to facilitate Phase 2 of the development for the Las Palmas Senior Apartments
Policy H-3.2: The City shall support efforts to provide emergency shelter, transitional housing, and permanent supportive housing for homeless persons.			
H-3.E: Homeless Count	The City shall participate in the Stanislaus County Point in Time Count to quantify local homeless populations and others with a need for emergency shelter.	The City has maintained the annual Point-in-Time count of homeless individuals within the City of Patterson.	Modify This program will continue during the 6th Cycle, but has been modified in Chapter 3 of the Housing Element (Program 4.8) to include provisions for emergency shelters and supportive housing.
H-3.I: Single Room Occupancy (SRO) Units	The City shall amend the Zoning Ordinance to allow development of Single Room Occupancy (SRO) units in appropriate zones (e.g., those that allow multifamily housing). The Zoning Ordinance will include development standards for SRO units.	The City did not complete the amendment to the Zoning Ordinance to include Single Room Occupancies, due to limited staffing.	Modify This program has been continued and modified in Chapter 3 of the 6th Cycle Housing Element (Program 4.10) as a means of providing transitional and/or supportive housing to special needs populations in the City.
Policy H-3.3: The City shall support efforts of homeless service providers in establishing additional short-term beds for all segments of the homeless population by ensuring that development standards will only subject shelters to the same development and management standards that apply to other allowed uses in the approved zones.			
N/A			
Policy H-3.4: The City shall work with homeless service providers and social services organizations to expand shelter opportunities for specialized homeless groups, such as children and families, those with chronic mental illness, and the disabled.			
N/A			

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-3.5: The City shall coordinate with homeless shelters to pursue funding for the ongoing maintenance and expansion of their services. The City shall continue to provide individuals with disabilities reasonable accommodation through flexibility in the application of land use, zoning, or building regulations, when necessary to eliminate barriers to housing opportunities.			
N/A			
Policy H-3.6: Where practical and feasible, the City shall support applications for County, State, and Federal funding for the construction and rehabilitation of supportive housing for persons with disabilities, including developmental disabilities.			
N/A			
Policy H-3.7: The City shall maintain a housing rehabilitation program to provide a one-time grant or loan to extremely low- and very low-income disabled persons and senior citizens to improve accessibility and safety.			
H-3.F: Mobility Device Grants	The City shall, based on available resources, provide accessibility and mobility enhancing device grants to persons with disabilities.	This program was not implemented due to limited staffing.	Discontinue The program was not implemented due to limited staff capacity, and will not be continued.
Policy H-3.8: The City shall support developers and non-profit housing developers of farmworker housing by assisting in potential site identification and applying for or supporting applications for funding, such as the Joe Serna Jr. Farmworker Housing Grant Program.			
H-3.G: Employee Housing Act	The City shall update the Zoning Code to be consistent with the Employee Housing Act (Health and Safety Code 17021), which generally requires employee housing to be permitted by-right, without a CUP, in single-family zones for less than six persons, and in all zones that allow agricultural uses with no more than 12 units or 36 beds.	The City did not complete this program during the 5th Cycle due to limited staffing and capacity.	Continue The City has included Program 4.11 in Chapter 3 of the 6th Cycle Housing Element to implement the requirements of the Employee Housing Act.
H-3.H: Farmworker Housing	The City shall seek to coordinate programs and funding from state and federal programs through the Stanislaus County Housing Authority. The City will work with the Housing Authority to explore opportunities for locating farmworker housing within the city, as demand necessitates. Through the Housing Authority and Farm Bureau, the City will meet with stakeholders to discuss the demand for farmworker housing and whether pursuit of funding for this type of housing is needed. The City, through the Housing Authority, will provide assistance to the farming community and housing developers in obtaining loans and grants and processing	No action has been taken on this program to further expand the farmworker housing supply within the jurisdiction, as the City has adequate housing within city limits to accommodate the housing needs of the City's farmworkers.	Continue Program 4.11 in Chapter 3 of the 6th Cycle Housing Element addresses farmworker housing to ensure that the City complies with the requirements of the Employee Housing Act. The City will continue to work with the Stanislaus Regional Housing Authority and the Office of Migrant Services (OMS) to provide services to

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
	applications for the rehabilitation and/or establishment of new farm labor housing under USDA Rural Development and California Department of Housing and HCD programs and other funding sources that may become available. The City will assist, based on available staff resources, nonprofit groups and stakeholders in pursuing funding resources, water and sewage availability, and entitlements. In addition, the City will provide, based on available resources, development incentives for the provision of farmworker housing and expediting the permitting process for all farmworker housing projects, to the extent feasible.		farmworkers and expand farmworker housing in other areas of the city.
Policy H-4.1: The City shall maintain entitlement procedures that provide the City sufficient oversight of the development and design process while offering residential developers a fair, timely, consistent, and predictable process.			
H-4.C: Design Review	The City shall monitor the outcomes of its Design Review process for multifamily projects to ensure findings and project requirements do not result in unreasonable costs being added to the development of affordable housing. The City shall annually report to the City Council the types of findings and requirements resulting from design review.	The City reviewed the Design Review process and noted that multi-family permitting process takes on average, 6 months. While the City has Community Design Guidelines, they are not specific to multi-family housing. Most of the multi-family units are located within Master Plan Areas, and multi-family development above 4 units has to be reviewed by the Planning Commission.	Continue The City has discovered subjective language within its Design Guidelines. The City will remove language subjectivity, especially for reasonable accommodation requests or multi-family housing geared towards residents with disabilities. Additionally, Program 1.8 commits the City to developing Objective Design Standards.
Policy H-4.2: The City shall encourage continue to monitor and refine its processes and regulations to barriers to the production of housing, particularly affordable- and higher-density housing.			
H-4.A: Annual Action Plan	The City shall publish the City's Housing Element and updates, Annual Action Plan, and respective notices and post these documents on the City's website, and shall provide an annual funding application workshop for interested agencies and developers.	The City has implemented this program, and will continue to do so going forward.	Continue Chapter 3 of the Housing Element reflects the City's update Housing Action Plan.

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-4.3: The City shall ensure adequate infrastructure and public services are provided to serve existing and planned residential development.			
N/A			
Policy H-4.4: The City shall encourage developers to "piggyback" or file concurrent applications (i.e., rezones, tentative tract maps, conditional use permits, variance requests, etc.) if multiple approvals are required, and if consistent with applicable processing requirements, to reduce processing times.			
N/A			
Policy H-4.5: The City shall ensure that the development community (both non-profit and for profit) is aware of the housing programs and technical assistance available from the City.			
N/A			
Policy H-4.6: The City shall continue to facilitate the review of development applications, encourage pre-application meetings with planning and building staff, and streamline the overall planning application and building process for all residential development.			
N/A			
Policy H-4.7: The City shall facilitate lot consolidation to encourage the development of housing for lower-income households.			
N/A			
Policy H-4.8: The City shall consider, on a case-by-case basis, deferring payment of fees until housing units are sold, ready for occupancy, or long-term financing is in place, as a means of assisting affordable housing projects.			
H-4.B: Development Fees for Low-Income Housing	Based on available resources, prudent fiscal planning, and applications for housing projects, the City shall provide developers of low-, very low-, and extremely low-income housing reduced and or deferred development fees. The City shall strive to assist in the development of 100 affordable housing units through 2023.	The city's fee schedules were last updated in 2022.	Continue The City has included Program 4.5 in Chapter 3 of the 6th Cycle Housing Element to continue incentivizing fee waivers and reductions for multi-family and family-friendly housing.
Policy H-5.1: The City shall protect and stabilize existing residential neighborhoods from the encroachment of incompatible or potentially disruptive land uses and/or activities.			
N/A			

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-5.2: The City shall prioritize code enforcement activities for housing and provide adequate funding and staffing to support code enforcement and graffiti abatement programs.			
H-5.A: Neighborhood Preservation	The City shall promote neighborhood preservation and code compliance by regularly monitoring neighborhoods for code violations and graffiti vandalism, and taking action to abate or remedy identified violations as soon as they occur.	The overall objective of Code Enforcement is to promote and maintain a safe and desirable living and working environment. The City of Patterson does this by working in partnership with City residents and business owners by applying a fair and unbiased enforcement program designed to increase public awareness of City's Municipal Codes (e.g. property maintenance, public nuisance violation(s), abandoned vehicle(s), zoning, etc.) and to facilitate the correction of said code violations as they arise. The City proactively monitors and reports any code violations related to graffiti and vandalism.	Continue This program was effective during the 5th cycle, and the program has been continued (Program 2.1) in Chapter 3 (Housing Action Plan) of the Housing Element.
H-5.B: Code Enforcement	The City shall continue to investigate complaints and take action concerning Code Enforcement violations to encourage rehabilitation of substandard residential properties by homeowners and landlords and improve overall housing quality and conditions in the city.	This program has been effective in maintaining property and housing conditions. The following are some common code violations: • Building Code violations such as construction without permits; including but not limited to room additions, garage conversions, construction of patio covers, re-roofs, electrical, plumbing and mechanical improvements such as water	Continue This program has been effective, but was modified to include outreach about rehabilitation resources (Program 2.1) in the Housing Action Plan (Chapter 3).

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
		heater installations and HVAC installations. • Accumulation of junk and debris in public view in residential and commercial areas. • Unpermitted businesses in residential neighborhoods. • Inoperable or abandoned vehicles on private property. • Zoning violations for structures and land use requirements, including the use of the structure, size and location. • Hazardous and overgrown vegetation which can be a fire hazard. • Vacant and unsecured properties. • Parking violations on unimproved surfaces such as landscaped areas.	
Policy H-5.3: The City shall promote orderly growth of neighborhoods by phasing the approval of building permits to one area of a subdivision at a time to allow for timely extension of infrastructure and efficient use of resources.			
N/A			
Policy H-5.4: The City shall provide technical and financial assistance through grants or low interest loans to all eligible homeowners and residential property owners to rehabilitate existing dwelling units.			
H-5.C: Housing Rehabilitation Funds	The City shall continue to use HOME housing rehabilitation funds for the rehabilitation of 18 units.	The City of Patterson receives Community Development Block Grant (CDBG) and HOME funds from the U.S. Department of Housing and Urban Development through the	Continue The use of HOME housing rehabilitation funds has been effective and the City has met its target for units. The program offers up to $20,000 in

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
		Stanislaus County Block Consortium. The consortium includes Stanislaus County and the Cities of Patterson, Oakdale, Newman, Ceres, Waterford, and Turlock (for the HOME program only). This program is designed to repair or eliminate conditions that present critical health and safety hazards and provides assistance for disabled people in making their homes more accessible.	assistance in a combination of grants and/or loans and income limits apply. There is an ongoing use of funds.
H-5.D: Publicize Rehabilitation Programs	The City shall provide information about available housing rehabilitation loan programs to qualifying households.	The City identifies prospective applicants through outreach at a variety of locations including the City's website, tabling at Farmer's markets and partnerships with non-profits including the Westside Resource Center regular meetings. In addition, Code Enforcement staff provide information when related Code violations are identified.	Continue This program was effective, and has been continued and expanded (Program 2.1) in the Housing Action Plan (Chapter 3).
Policy H-5.5: The City shall install and upgrade public service facilities (streets, curb, gutter, drainage facilities, and utilities) to encourage increased private market investment in declining or deteriorating neighborhoods.			
N/A			
Policy H-5.6: The City shall strive to preserve existing affordable housing units.			
H-5.E: At-Risk Units	Based on available staff resources, the City shall maintain contact with the operators of at-risk affordable housing to ensure the preservation of affordable units. Based on the likelihood of units being converted to market rate, the City shall strive to preserve 24 units through 2023.	The City has a dedicated staff person focused on housing within the city. City staff is in regular contact with operators of at-risk affordable units in order to ensure preservation of the units.	Continue This program was effective, and has been expanded (Program 2.2) in the Housing Action Plan (Chapter 3).

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
H-5.F: Technical Assistance	The City shall provide technical assistance to potential purchasers of at-risk affordable housing, including non-profits, developers, and tenants to help preserve affordable housing in Patterson.	The City has a dedicated staff person focused on housing within the city. City staff provides technical assistance to potential purchasers of at-risk affordable units.	Continue This program has been modified and combined with the one above in the Housing Action Plan (Chapter 3).
Policy H-6.1: The City shall establish a development pattern that helps reduce vehicle miles traveled and promotes transit ridership, and pedestrian and bicycle access.			
N/A			
Policy H-6.2: **The City shall continue to promote sustainable housing practices that incorporate a "whole system" approach to siting,** designing, and constructing housing that is integrated into the building site; consumes less energy, water, and other resources; and is healthier, safer, more comfortable, and durable.			
N/A			
Policy H-6.3: The City shall ensure that all new residential development meets or exceeds the standards contained in Title 24, Part 6 of the California Code of Regulations (Energy Efficiency Standards for Residential and Nonresidential Buildings), and encourage the retrofitting of existing development to improve energy and conservation.			
N/A			
Policy H-6.4: The City shall encourage homeowners and property owners of existing residential buildings to incorporate energy and water efficient features and renewable energy facilities in structures.			
H-6.A: Energy Efficiency and Water Conservation Awareness	Based on available resources, the City shall develop and periodically update energy efficiency and water conservation awareness brochures and provide them in all publicly accessible City buildings and in City information sources (e.g. the Citizen's Newsletter).	The city's Citizen's Newsletter is distributed on a quarterly basis and included this information which reaches the broader community. Additionally, brochures are available in all publicly accessible city buildings.	Continue This program has been effective, and is expanded and included in the Housing Action Plan (Program 3.1).

Program Name	Summary Program Description	Accomplishments	Program Effectiveness
Policy H-7.1: The City shall promote fair housing opportunities for all people regardless of race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, disability, or source of income.			
H-7.A: Fair Housing Materials	Based on available resources, the City shall develop, periodically update, and regularly distribute fair housing materials at a number of locations throughout the city, such as City government buildings, the post office, and the library and to service organizations, non-profits, and other groups to educate property owners and managers about housing discrimination.	The city has a dedicated staff person focused on housing within the city. Information on Fair Housing is regularly distributed and included in the Citizens newsletter.	Continue This program has been modified and expanded in the Housing Action Plan (Chapter 3) to contain more proactive steps to educate residents on fair housing issues (Program 5.3).
Policy H-7.2: The City shall assist in the enforcement of fair housing laws by providing information and referrals to the public.			
H-7.B: Project Sentinel	The City shall refer housing discrimination complaints to Project Sentinel, a HUD-approved housing counseling agency.	The city has a dedicated staff person focused on housing within the city. City staff refers housing discrimination complaints to Project Sentinel.	Continue This program has been combined with the program above (H-7.A) and expanded in the Housing Action Plan (Chapter 3) to provide a clearer path forward for handling fair housing cases (Program 5.1).

SOURCE: City of Patterson, 2024

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Public Participation and Outreach

C

APPENDIX

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Appendix C
Public Participation and Outreach

The Housing Element must reflect the values and preferences of the community. Accordingly, community participation is an important component of the development of this Housing Element. Section 65583(c)(8) of the Government Code states that the local government must make "a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element." This process not only includes community members, but also includes participation from local agencies and housing groups, community organizations, and housing sponsors.

The primary purpose of this appendix is to describe the effort made by the City of Patterson to engage all economic segments of the community (including residents and/or their representatives) in the development and update of the housing element. Included in this appendix is a list of contacted organizations, tribal units, and other stakeholders that were contacted during the preparation of Patterson's 6th Cycle Housing Element.

C.1 Public Noticing

The City of Patterson employed an assortment of methods to generate awareness and maximize public engagement during the Housing Element update process. The City developed and continuously updated a page on the City's website dedicated to information on the Housing Element update.[1] The City distributed bilingual (English and Spanish) informational flyers to inform the community of the Housing Element update, housing needs survey, property owner interest forms, community workshops, and other opportunities for participation. In addition, the City promoted informational flyers and links to engagement opportunities on the City's social media outlets, such as Facebook.

[1] https://www.ci.patterson.ca.us/150/City-of-Patterson-Housing-Element

C.2 Community Workshops

November 12, 2024 Workshop

The City of Patterson hosted a joint Planning Commission and City Council Community workshop on November 12, 2024 to engage the community in the Housing Element update process. The workshop was hosted in-person at City Hall.

The workshop introduced the Housing Element process and state requirements, as well as the Public Draft Housing Element. The workshop consisted of an informative PowerPoint presentation on the Housing Element update process and timeline, providing contextual information on the contents and key issues of the Housing Element. The workshop also included a discussion on housing challenges in Patterson and potential strategies to improve housing opportunities. The Housing Needs Survey and Property Owner Interest Survey were both advertised at the meeting as well.

The following housing concerns were raised by participants during the community workshop:

- Zoning standards;
- Increasing housing densities;
- Parking and height requirements in the downtown area;
- Potential for underground parking for multi-family housing;
- Universal Design requirements;
- Comparing impacts of a 30 percent RHNA buffer vs. 15 percent RHNA buffer;
- Timeline to build required units;
- Accessory Dwelling Units (ADU);
- Inclusion of infill and small lots in the housing plan;
- Management of new housing types;
- Apartment inspections;
- Closure of buildings;
- Ensuring impact fees align with inflation;
- Reducing traffic congestion and emissions;
- Water and sewer requirements for new housing;
- StanRTA transit program considerations; and
- Financial challenges associated with building in the downtown area.

C.3 Public Draft Review Period

In accordance with Government Code Section 65585(b)(1), the Housing Element was released for a 30-day public comment period. The review period began on November 5, 2024 and ended on December 5, 2024. During the public-review period of the Public Draft Housing Element, the City received comments from representatives of the general public and the Rutan and Tucker, LLP, on behalf of Keystone Ranch, LLC.

Table C-1 reports all comments received on the Public Draft Housing Element and City staff responses to comments.

C.4 Revised Draft Public Review Period

Pursuant to Assembly Bill (AB) 215 requirements, the April 16, 2025 Revised Draft Housing Element was released for a seven-day public review period. The review period began on April 16, 2025 and ended on April 23, 2025. During the public review period of the Revised Draft Housing Element, the City received a comment letter from Rutan and Tucker, LLP, on behalf of Keystone Ranch, LLC. In addition, the City received a comment letter from YIMBY Law on May 29, 2025, outside of the formal public comment period.

The City posted a Revised Draft Housing Element on the City's Housing Element webpage on August 6, 2025 for public review. The public review period ran from August 6 through August 22, 2025. Public comments were received from Rutan and Tucker, LLP and YIMBY Law.

All comments are included in Table C-1 below, as well as page numbers where revisions were made in response.

Table C-1 Public Comment Response Matrix

Date Received/ Draft Iteration	Topic	Comment	Response
11/12/2024 Public Review Draft	Accessible Transit	Kandace Weyhrauch, Patterson Resident – expressed concern about the meeting not being accessible via Zoom. Weyhrauch also stated that StanRTA transportation is not inherently a problem but emphasized the need for advocacy and spreading awareness about available options. Additionally, Weyhrauch highlighted the importance of making Accessory Dwelling Units (ADUs) more affordable for the community.	The City is committed to collaborating with the Stanislaus Regional Transit Authority (StanRTA) to expand transportation access to the western and eastern regions of the city, enhancing overall connectivity. To support this, Program 1.9 has been included in Chapter 3 of the Housing Element to commit the City to specific actions and goals to expand transit access in Patterson. See Chapter 3 for full program details. The City recognizes that Accessory Dwelling Units (ADUs) are an important resource for providing affordable housing solutions. To support this, the City has proposed Program 4.12, which outlines specific actions to facilitate ADU construction and provide assistance to residents interested in building an ADU on their property. See Chapter 3 for full program details.
11/12/2024 Public Review Draft	ADUs and Universal Design	Sheryll Lex, Patterson Resident – emphasized the need to make Accessory Dwelling Units (ADUs) more affordable. Lex also addressed the universal design principles, as well as considering underground parking and improved transportation options.	See response above related to ADUs and expanding transit access in Patterson. Program 4.2 proposes the adoption of a Universal Design ordinance to establish provisions in new developments that accommodate a wide range of physical abilities and disabilities, including limited mobility, lifting, and vision impairments. Feedback from the City's Housing Needs Survey highlighted a demand for housing tailored to seniors and individuals with disabilities. Implementing a Universal Design ordinance would expand housing options that better meet the needs of these groups. See Chapter 3 for full program details.
12/05/24 Public Review Draft	Various	Rutan & Tucker, LLP 1. The City **has delayed acting on Keystone's housing development project** for 12 years and is likewise delinquent in updating its Housing Element. As you know, the City's Housing Element was required to be adopted and certified by December 31, 2023. The Department of Housing & Community Development ("HCD") sent the City a letter on May 13, 2024, urging it to submit a draft Housing Element and obtain compliance with State Housing Element Law	This comment has been noted. The City is submitting its draft Housing Element to HCD for review. No revisions were made to the Housing Element in response to this comment.

Date Received/ Draft Iteration	Topic	Comment	Response
		no later than June 10, 2024. HCD's letter outlined the consequences to the City of non-compliance, including: (1) ineligibility to receive state funds that require a compliant housing element as a prerequisite, (2) being subject to the Builder's Remedy and other loss of local planning control, and (3) facing financial and legal ramifications such as legal suit brought by the Attorney General and the payment of court-imposed penalties (up to $100,000 per month). Despite the need for urgent action, the City did not release the DHE until nearly one year after the statutory deadline and six months after HCD's letter. The City's delays in processing the DHE are consistent with its delays in processing Keystone's request for approval of a 719-unit housing development project (the "Project"). That development, known as Keystone Ranch, is identified as one of the key developments needed in order for the City to meet its Regional Housing Needs Allocation ("RHNA"). Keystone first applied for the Project in 2012. Yet still now some 14 years after first being proposed, the City still has not deemed the Project application complete. Instead, it has sent three "incompleteness" letters since May 2024 on the latest application submittal. The City's incompleteness letters demand additional information that is not specified on the City's submittal checklist, request new information, and seek items that are not based on objective development standards. The City's unjustified refusal to process Keystone's Project application is posing a major constraint to residential development in the City.	
		2. Among other errors, the Draft Housing Element understates the City's RHNA obligations. The DHE references the City's RHNA as 3,716 units. This includes 523 extremely low-income units, 523 very low-income units, 724 low-income units, 593 moderate-income units, and 1,353 above-moderate income units. (DHE, p. 1-25.) That understates the City RHNA obligations. Due to an unaccommodated need of 196 lower-income units from the 5th Cycle Housing Element, the City's adjusted RHNA is actually 3,912 units, increasing the very low and low RHNA by 98 units each. (DHE, p. 3-3.) The City is supposed to provide a 15-30 percent buffer. But DHE Table 4-2 shows only an 11% and 17% buffer for very low-income and low-income units, respectively. The DHE says units in projects that received a certificate of occupancy by June 30, 2023 will be eligible for RHNA credit. (DHE, p. 4-4.) It seems those units would more appropriately be counted in the 5th Housing Element Cycle. This	The City's Housing Element addresses the 5th cycle unaccommodated need in Chapter 4, Housing Resources and Sites Inventory (pages 4-2 and 4-3). The Sites Inventory is designed to accommodate both the unaccommodated need and the 6th cycle RHNA. Per HCD guidance, jurisdictions are encouraged to provide a 15-30 percent buffer when preparing the site inventory (HCD Site Inventory Guidebook, June 2020, page 22). This is only a recommendation, not a requirement. Per HCD guidance, RHNA credit for units with certificates of occupancy is based on the applicable projection period, not the planning period (HCD Site Inventory Guidebook, June 2020, pages 5-6). Crediting units with certificates of occupancy within the applicable timeframe (June 30, 2023 - December 31, 2031)

Date Received/ Draft Iteration	Topic	Comment	Response
		also has the effect of understating the City's RHNA obligations for the 6th Housing Element Cycle.	does not result in an understatement of the City's RHNA obligation. The Draft Housing Element has been revised to clarify that projects that received a certificate of occupancy on June 30, 2023 or later, are eligible for RHNA credit (page 4-4).
		3. The City is improperly attempting to revise and re-write the Master Plan through the Draft Housing Element. Keystone Ranch is comprised of 75.9 acres of land designated Medium Density Residential or "MDR" (503 units) and 12.6 acres designated High Density Residential or "HDR" (216 units). The Zacharias and Baldwin Ranch Master Plan ("Master Plan") indicates that areas designated MDR will include attached and detached housing units and may include traditional subdivisions as well as alternative layouts. (Master Plan, p. 27.) The Master Plan makes clear that alternative layouts will be focused in the Core Area, which will be closer to retail, services, and recreation activity. (Master Plan, p. 13.) The majority of the Project site is situated within the Non-Core Area. (Master Plan, p. 14.) The Master Plan states that HDR areas will include apartments, townhomes, flats, and condominiums. (Master Plan, p. 36.) In accordance with the Master Plan, Keystone has submitted an application for 503 single-family detached units and approximately 216 attached multi-family units. The DHE purports to revise or amend the Master Plan in ways that are not supported by the law or logic. For instance, it states that while "detached single-family homes are permitted, the regulations are better suited for smaller, attached units, reflecting a clear emphasis on medium-density development that supports housing variety." (DHE, p. 2-12 [further noting the development standards for MDR "are optimized for attached housing types such as townhomes and duplexes."].) There is nothing in the Master Plan to support the above statements. The City cannot amend the Master Plan through the guise of the DHE. While the City Staff may desire alternative developments, the reality is that ninety percent of the City's housing stock is traditional single-family development and the Master Plan explicitly allows such development. (DHE, p. 1-14; Master Plan, p. 27.) The proposed density range for HDR in Table 2-5 [20.1-35 units per acre] is not consistent with the density range for HDR in the Master Plan (see DHE, Table 2-7 [specifying densities of 12.1 to 25 units per acre]. The DHE should be revised	There is no attempt to amend the standards described in the Master Plan through the Housing Element. Revisions are included to clarify that there are no amendments being made to the Master Plan (see pages 2-7 in Table 2-5, 2-13, 3-11, and 3-12 in Table 3-2). The Site Inventory utilizes the densities described in the Master Plan, which for Keystone Ranch parcels are: 6.0, 7.4, and 17.1 dwelling units per acre. The number of units assumed in the Site Inventory aligns with those outlined in the Master Plan (216 High Density Residential and 503 Medium Density Residential).

Date Received/ Draft Iteration	Topic	Comment	Response
		to make clear that the proposed density ranges for HDR in Table 2-5 do not apply in the Master Plan area. (See also Program 1.10 at DHE, p. 3-11.) Again, the City cannot amend the Master Plan through the Housing Element process.	
		4. In accordance with the law, the City must adopt and apply objective development standards to all housing development projects. The DHE acknowledges that the City lacks objective design standards ("ODS") and instead applies Community Design Guidelines adopted in 2002 to residential development. (DHE, p. 2-18.) The DHE also acknowledges that the absence of ODS "poses a constraint to residential development," correctly noting that "[s]ubjective guidelines and unclear zoning standards increase uncertainty and risk for housing developers" while ODS offer clarity for developers and assurance to the community. (DHE, p. 2-18.) But instead of committing to adopt ODS for all residential developments, as required by law, the DHE includes a program to establish ODS for mixed-use and multi-family residential projects only. (DHE, p. 3-9). The Housing Accountability Act has long required cities to evaluate all housing projects based on objective planning, zoning, and subdivision standards, including design review standards. (Gov. Code § 65589.5(j).) The Housing Crisis Act likewise forbids affected cities (including Patterson) from imposing or enforcing design standards that are not objective in nature on any land where housing is an allowable use. (Gov. Code § 66300(b)(1)(C).) In accordance with the law, we urge the City to revise Program 1.8 and commit to adopting ODS for all housing/residential projects, not just multi-family or mixed-use ones.	This comment has been noted. No revisions were made to the Housing Element in response to this comment. The City acknowledges the requirements of the Housing Accountability Act and the Housing Crisis Act. In the case of Keystone Ranch, development would be subject to the development standards contained in the Zacharias Master Plan.
		5. The City Council has made constraints on new housing much worse by recently voting to increase development impact fees by 483%. In terms of other governmental constraints on new housing, the DHE acknowledges that the City has the highest impact fees among nearby jurisdictions. (DHE, p. 2-36 ["Patterson has the highest total fees for single-family and multi-family dwellings among nearby jurisdictions . . . .."].) This statistic was based on 2021 information pre-dating the substantial increase in impact fees by the City Council in October and November 2024. (See City Council Resolution Nos. 2024-59 and 2024-65 [increasing fees overall by 483%, with parkland in-lieu fees increasing by nearly 1000%].) As a condition to certification of the Housing Element, HCD should order the City to re-examine its fees and demonstrate that any new fees have a nexus to the	This comment has been noted. Revisions were added to pages 2-35 and 2-37, explaining the City's recent development impact fee updates and reflecting the City's current development impact fee schedule. All ordinances, resolutions, nexus studies, and other information pertaining to the City's development impact fees are available for public review.

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		impacts of new development, were based on an adopted capital improvement plan to fairly apportion costs between new and existing development, and comply with all other procedural and substantive requirements of law.	
		6. The City is not serious about expediting local processing and permit **procedures, as evidenced by Keystone's attempts over 12 years to get a** housing development approved. The DHE also acknowledges that local processing and permit procedures "can pose a considerable constraint to the production and improvement of housing," including "lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval." (DHE, p. 2-37.) Keystone has experienced almost all of these delays in connection with the City's processing of its Project application. For the past 12 years, Keystone has attempted to secure approvals for its housing development Project. In April 2024, it submitted its latest Project application. The application still has not been determined to be complete by Staff, which has instead wasted months in sending three letters asserting "incompleteness" based on unwarranted demands for additional information that the City cannot lawfully demand. The key question is what exactly will the City do to rectify this situation. Policy H-5 calls for facilitating streamlined and efficient development processes. It states the City will "promote timely, consistent, and predictable development procedures by streamlining the approval process for residential developments." (DHE, p. 3-2.) But it contains no other details or commitments. The DHE says the City will advance the development of large-scale projects within the Zacharias and Baldwin Master Plan areas. (DHE, p. 4-2.) But that has not how the City has treated Keystone's Project application over the last 12 years. It has been more than six months since Keystone submitted its full and detailed Project application and City Staff still has not found it to be complete. The DHE's intended timeframes of 5-6 months for single-family development to obtain a building permit (DHE, Table 2-14) are not consistent with the City's dilatory treatment of Keystone's Project. They are also inconsistent with the text on the previous page, indicating one month processing time for single-family projects and four to six months processing time for multi-family projects. What are the time-frames in Table 2-14 based on?	This comment has been noted. Programs 1.6 and 1.7 (pages 3-7, 3-8) include actions to implement expedited planning review and processing for affordable housing projects, including hiring 1.0 Full Time Equivalent staff to oversee housing priorities aligned with meeting the City's RHNA. (Pages 2-39, 2-40, 2-41) The Housing Element explains that planning entitlements and architecture/site plan review are completed in 1 month for single-family projects, while issuance of building permits may take 5-6 months after approval of planning entitlements. The timing for issuance of building permits is influenced by many factors beyond the City's control. Multifamily project applications are lengthier and more detailed, resulting in longer entitlement processing time frames. The processing time for multifamily projects is estimated to be 4-6 months. The following language was added to clarify that annexation and large subdivision projects may experience lengthier processing timelines: "Permit processing for large annexation projects can take years and involve extended timelines, for a number of reasons. Annexations are contingent upon Local Agency Formation Commission (LAFCO) approval and may require elections. Other variables include agricultural land impacts; sphere of influence amendments and municipal service reviews; processing applications through LAFCO; if the annexation is City or landowner-initiated; preparation of planning documents and environmental impact reports; infrastructure analysis; coordination with neighboring public agencies; the number of landowners; public review and outreach; impacts to City finances; negotiation of development agreements; and litigation. Many of these factors can also apply to large subdivision projects which result in extended timelines. The Baldwin Ranch

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			North subdivision, which was already within City limits, was processed within approximately two years (2021–2023). Planning permits were approved in 2023, followed by the issuance of building permits in less than six months. Currently under development, Baldwin Ranch North is a typical processing timeline for large subdivisions within City limits. Part of the Baldwin Ranch North project application also included a development agreement between the developer and the City." (page 2-42). Keystone's project application is an example of an annexation influenced by many of the factors mentioned above. The Zacharias Master Plan was a City-initiated annexation. With the Zacharias Master Plan having been formally annexed in 2024, Keystone's tentative map application is currently being processed with public hearings to occur in the near future. Furthermore, the City Council chose to adopt the Master Plan and initiate annexation at its discretion, to add approximately 1,300 acres to City limits with the potential for 5,091 new dwelling units.
		7. The Draft Housing Element acknowledges that the City has adequate **infrastructure but Staff still refuses to process Keystone's application unless it agrees to pay the City's exorbitant new impact fees.** The DHE states that the City has adequate water supplies and wastewater treatment facilities to serve new development. (DHE, pp. 2-52 to 2-53; see also DHE, p. 4-10 [noting that "temporary connections to existing water and wastewater systems in the Keystone Ranch and Lakeside Hills areas are available to support initial phases of development" and that the "City is actively pursuing financing to advance development within the Zacharias Master Plan area."].) On page A-67, the DHE states the City "plans to use CIP funds to prepare this area for residential development." In light of the City's representations in the DHE regarding the adequacy of water and wastewater infrastructure, why has the City not settled a suit brought by the Patterson Irrigation District and the West Stanislaus Irrigation District against the Master Plan Environmental Impact Report ("EIR") alleging lack of adequate	This comment has been noted. No revisions were made to the Housing Element in response to this comment. City staff is not authorized to provide comments on active litigation. For individual project applications filed with the City, the City conducts CEQA review at that time, which typically begins with an initial study, as required by CEQA. All ordinances, resolutions, nexus studies, and other information pertaining to the City's development impact fees are available for public review. Development agreement negotiations with the major developers of the Zacharias Master Plan are ongoing. City staff is not

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		water supplies? The DHE is silent as to what form of environmental review will be conducted pursuant to the California Environmental Quality Act ("CEQA") for this major planning project. We assume that the City intends to rely on the Master Plan EIR at least for the two major developments located in the Master Plan area, e.g., Keystone Ranch and Lakeside Hills. Resolving the litigation and ensuring the validity of the Master Plan EIR thus has some urgency. What other CEQA document is the City planning to rely on for the other developments in the DHE's Housing Sites Inventory? And further, why has the City Manager stated that City Staff will not even talk to Keystone about an interim sewer connection until the City and Keystone reach "an agreeable solution" with respect to payment of development impact fees.1 Staff has indicated that "an agreeable solution" equates to Keystone waiving its rights under its SB 330 Preliminary Application and requiring Keystone to pay the City's newly-proposed higher and unjustified impact fees. If that is not accurate, please explains what it meant by "an agreeable solution."	authorized to disclose information pertaining to active negotiations of development agreements. Keystone's tentative map application has been deemed complete and is being processed, with hearings scheduled in the near future. The Planning Commission and the City Council are the bodies that vote on formal development applications. City staff is charged with processing applications and making recommendations to its commissions and legislative bodies.
		8. The Draft Housing Element's assumptions about affordable housing units are not reasonable or justified. In terms of "affordability" assumptions, the DHE assumes—without any explanation or substantiation—that the Master Plan will produce 508 very low-income units, 315 low-income units, and 604 moderate-income units along with 1,813 above moderate-income units. (DHE, p. 4-3.) The assumed "affordable" units will supposedly be provided by Keystone Ranch and Lakeside Hills. But Lakeside Hills is not even intended to be in the first phase of development of the Master Plan. (Master Plan, p. 115 [identifying Keystone Ranch as Phase 1A and Lakeside Hills as Phase 2B].) Further, why is the percentage of low-income units supposedly required for Keystone substantially higher than the percentage of low-income units for Lakeside Hills? (DHE, pp. 4-11 to 4-12.) The DHE seems to simply identify two larger developments in the Master Plan and load all of the City's affordability requirements onto them, without explanation or justification. As to Keystone Ranch, the DHE assumes that 108 units will be very-low income, 108 units will be low-income, 150 units will be moderate-income, and 353 units will be above moderate-income. (DHE, pp. 4-11, A-62, A-63.) To the contrary, all of Keystone's units are proposed as market-rate units and Keystone has not	This comment has been noted. Similar to any other development project in the City of Patterson, new development is subject to the City's Inclusionary Ordinance. (Patterson Mun. Code, § 18.86.) The Site Inventory capacity assumptions for Keystone Ranch parcels (Site #1) have been revised (see pages 4-9, page 4-12 at Table 4-5). The sites are appropriately sized and zoned to accommodate lower-income units, as per HCD guidance. The Housing Element Sites Inventory serves as an inventory of available land for potential development during the planning period, along with a capacity analysis of how identified sites could be developed. It does not assume what a developer will build, but demonstrates that the City has zoned adequate sites to accommodate its RHNA based on realistic development potential.

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		expressed any interest nor provided the City any information to indicate that it is proposing to construct affordable housing units—nor has the City previously expressed any intention to impose such affordability restrictions, other than compliance with the City's existing inclusionary ordinance. The DHE assumes that 366 of Keystone Ranch's 716 units will be "affordable." This equates to more than 50 percent of the Project units. However, the City's inclusionary ordinance only requires that 15 percent of the units be affordable. (Patterson Municipal Code § 18.86.020.) The affordability assumptions—especially given lack of owner interest—are not reasonable or justified. (Gov. Code §§ 65583, 65583.2.) Moreover, the default density assumption of 20 units per acre as needed for lower income households cannot be relied on to assume that Keystone will provide 108 very low- and 108 low-income units. (DHE, p. 4-10; Gov. Code § 65583.2(c)(3).) Keystone's proposed 216 apartments will be developed at a density of 17.1 units per acre in accordance with the Master Plan. (Master Plan, p. 11.) Further, the default densities pertaining to moderate income households (4-100 units per acre) do not apply because the City is not a metropolitan jurisdiction. (Gov. Code § 65583.2(c)(4).) Instead, Patterson is classified as a suburban jurisdiction.2 No explanation is given or provided for the assumption of moderate-income units assigned to Keystone Ranch. Finally, the DHE states the City is collaborating with local developers to incentivize affordable housing projects in the Master Plan area in line with lower-income RHNA goals. (Master Plan, p. 2-14.) Specific details of projects and number of units should be provided. In closing, Keystone has submitted an application to the City to develop Keystone Ranch, one of the key sites relied on by the DHE's Housing Sites Inventory. Despite the need for residential development of Keystone Ranch in order to enable the City to meet its RHNA obligations, City Staff has arbitrarily delayed, prolonged, and otherwise refused to process Keystone's application in a reasonable or straight-forward manner. The City's delays in processing Keystone's Project application are posing a major constraint to the development of needed housing in the City. In accordance with the DHE's statements about the critical importance of providing "expedited review," we urge the City to process and approve Keystone's Project application as quickly as possible.	

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		Thank you for your consideration of Keystone's comments on the DHE. Please do not hesitate to contact me or Keith Schneider at (209) 892-5727 with any questions regarding this correspondence.	
		In closing, Keystone has submitted an application to the City to develop Keystone Ranch, one of the key sites relied on by the DHE's Housing Sites Inventory. Despite the need for residential development of Keystone Ranch in order to enable the City to meet its RHNA obligations, City Staff has arbitrarily delayed, prolonged, and otherwise refused to process Keystone's application in a reasonable or straight-forward manner. The City's delays in processing Keystone's Project application are posing a major constraint to the development of needed housing in the City. In accordance with the DHE's statements about the critical importance of providing "expedited review," we urge the City to process and approve Keystone's Project application as quickly as possible. Thank you for your consideration of Keystone's comments on the DHE. Please do not hesitate to contact me or Keith Schneider at (209) 892-5727 with any questions regarding this correspondence.	This comment has been noted. As referenced above, revisions were made to the Housing Element based on comments on the text and analysis contained in the Housing Element.
Nov 18, 2022 Public Review Draft *Letter sent directly to HCD prior to the start of the Housing Element update	CEQA timelines	David Kellog (Contra Costa County Resident); 350 Contra Costa; Greenbelt Alliance; CaRLA; Scott O'Neil (Palo Alto resident); Watson Ladd (Berkeley resident); Marven Normal (San Bernadino resident); Dara Dadachanji (San Francisco resident); George Grohwin (San Francisco resident) 1. The Housing Element from PATTERSON should include an analysis of compliance in its approval process with PRC 21080.1 & 21080.2. 2. The Housing Element from PATTERSON should add a program to specify (i) who is responsible for making the CEQA determination of PRC 21080.1, specify (ii) that their decision will be made within the timeframe permitted by PRC 21080.2, and specify that (iii), when they determine a project is exempt from CEQA, their determination triggers the Permit Streamlining Act (PSA) 60-day deadline (Gov. Code 65950(a)(5)). If existing local practices or regulations are incompatible with these state laws, the program should commit to enacting reforms necessary to achieve compliance within a reasonable and definite timeline.	This comment has been addressed in Chapter 2, Housing Constraints Assessment on page 2-45.
February 20, 2025 HCD Initial Draft	Various	John R. Beckman, CEO of BIA Greater Valley	This comment has been noted.

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		1. Notes that the Housing Element is out of compliance and should have been approved prior to January 1, 2024 2. Asks for HCD to not certify the draft Housing Element until the City of Patterson "demonstrates a commitment to solving the state housing crisis".	
April 23, 2025 Revised Draft Housing Element (published on April 16, 2025)	Various	Rutan & Tucker, LLP **1. The City Council recently denied Keystone's housing Project, one of the key opportunity sites identified in the City's Draft Housing Element.** Keystone acquired the Project site in May 2007 and has been attempting to build housing on the site ever since. The City's 2010 General Plan identified the Zacharias area for housing and other development and designated it Low Density Residential. (General Plan, pp. II-17, LU-3.)1 But the City subsequently indicated that it would not accept subdivision maps or plans for development in this area until a master plan was adopted. In August 2022, the City approved the Zacharias & Baldwin Ranch Master Plan (the "Master Plan") and certified an associated Environmental Impact Report ("EIR"). The Master Plan EIR finds that the Master Plan will decrease water demand by 60 percent compared to the existing agricultural uses and concludes that the Master Plan will not have a significant impact to groundwater supplies. (Draft EIR, pp. 3.15-5 to 3.15-22 [finding Impact US-1 to be less than significant with no mitigation required]; Draft EIR, pp. 3.9-23 to 3.9-26 [finding Impact HYD-2 to be less than significant with no mitigation required]; Final EIR, p. 3-70.) The EIR cites the City's Urban Water Management Plan and the Master Plan's Water Supply Assessment, both of which find that Patterson has sufficient water supplies to meet the Master Plan's water demand over the next 20 to 30 years during normal, dry, and multiple dry years. (Draft EIR, pp. 3.15-20 to 3.15-21, 4-13 to 4-14; Final EIR, pp. 3-39 to 3-40; *see also* Master Plan, p. 97 [Table 8 shows sufficient supplies for Project water demand currently and in future years].) As to storm drainage, the Master Plan EIR noted that each development site would construct its own stormwater retention/detention basin that would ultimately be routed to the Zacharias Recharge Basin. (Draft EIR, pp. 2-9 to 2-11, 3.9-28 to 3.9-29, 3.15-25 to 3.15-26.) The Zacharias Recharge Basin is described in the Master Plan and EIR as a single-basin supplied by stormwater runoff from Master Plan developments. The Master Plan indicated that all backbone infrastructure (storm drain, water, sewer and transportation) would be funded through a Community Facilities District ("CFD") that the City was obligated to form as part of the approvals of the Master Plan. (Master Plan, pp.	The matrix was prepared by HCD staff in response to the Initial Draft Housing Element and utilized to show where revisions were made in response to HCD preliminary comments.

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		93, 113-114; Master Plan Condition No. 41; Memorandum of Understanding between City and Stanislaus County dated May 2, 2023.) Keystone is and remains committed to paying its fair share of the backbone infrastructure identified in the Master Plan and Master Plan EIR for the Master Plan area, including the Zacharias Recharge Basin. Keystone's Project consists of approximately 719 housing units located on an approximately 95 acre site in the southeast portion of the Master Plan area, adjacent to existing development to the south and east. The Project is comprised of 506 single-family residential units and 213 multi-family residential units. The Project has an estimated potable water demand of 138 acre feet per year ("afy"). The Master Plan and EIR included a phasing plan with the Project being the first to develop, and noting that the "phasing plan reflects the economic factors associated with the costs of new infrastructure and, therefore, the areas that require the least costly infrastructure would develop first." (Draft EIR, p. 2-13; *see also* Master Plan, p. 114 ["The phasing of the infrastructure will be planned so that initial project construction will not be burdened with construction of improvements not needed until later in the project build-out."].) The Master Plan specifically refers to Keystone Ranch as an area to be "developed prior to the installation of the major storm drain facilities (lakes, FEMA basin, and recharge basin) . . .." (Master Plan, p. 98.) Keystone submitted a SB 330 Preliminary Application for the Project on November 6, 2023. The City reacted very negatively to this submittal. City Staff refused to acknowledge its validity of it due to the then-pending annexation of the Master Plan area. The City questioned whether SB 330 applied to the Project because it was not an urban, infill site. City Staff and officials told Keystone that it would pay more in fees than other developers if it were to proceed under SB 330. The City even canceled a scheduled election on the annexation until Keystone and other Zacharias stakeholders agreed to fund a series of public improvements for the benefit of the Ivy-Rose neighborhood. At the hearing where the City Council denied the Project, the Mayor claimed that Keystone was seeking preferential treatment by submitting a SB 330 Preliminary Application. Keystone attempted to submit its application for a vesting tentative map ("VTM Application") for the Project to the City on April 17, 2024. City staff refused to even receive the application, saying that they were instructed by "higher ups" not to accept it until the annexation was finalized. Staff's position in this regard violated the Subdivision Map Act, which allows subdividers to submit applications for subdivisions on land proposed to be annexed to a city. (Gov. Code § 66454.) Keystone sued, and the City relented and accepted the VTM	

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		Application. However, Staff proceeded to issue three (3) incompleteness letters that violated the Permit Streamlining Act and State Housing Laws by citing information not on the City's submittal requirement checklist, inapplicable and subjective design standards, and new information not in the first incompleteness letter. (Gov. Code §§ 65943(a)-(b), 65589.5(h)(6)(F).) None of the incompleteness letters raise any issues related to the adequacy of water supplies or infrastructure. On November 15, 2024, Keystone appealed the application incompleteness determination on the grounds that it violated the Permit Streamlining Act and amounted to a denial of the Project under the Housing Accountability Act. On December 20, 2024, the City reversed course and deemed the VTM Application "sufficiently complete" for processing. On February 20, 2025, the City's Planning Commission recommended "approval" of the VTM Application but with 159 conditions of approval—including a moratorium on development until the estimated $20 million City of Patterson Percolation Ponds for Stormwater Capture and Recharge ("City Perc Pond Project") was fully funded by developers and substantially complete. The City Council purported to impose these same conditions of approval on the Project. (Patterson City Council Staff Report, April 1, 2025, Item 8.1.a [the "Staff Report"], p. 176 ["The City will require developers of the Master Plan Area to fully fund and construct the [City Perc Pond Project] . . . before building permits are issued for the Master Plan Project."]; Staff Report, p. 177 [City Perc Pond Project "must be funded and constructed prior to the issuance of building permits"]; VTM Application Condition No. 4 at Staff Report, p. 208 ["Prior to issuance of the first building permit in the Master Plan areas, the [City Perc Pond Project] shall be sufficiently completed for the delivery of water for recharge at the Del Puerto Creek Project location."].) The July 2024 Delta Mendota Groundwater Sustainability Plan ("GSP") describes the City Perc Pond Project as a City water supply project to be supplied with stormwater from Del Puerto Creek and to be implemented by 2040, with an estimated cost of $7.8 million to be funded by State Grant Funds and the City of Patterson.3 (GSP, Table PMA-2, p. 5; *see also* GSP, p. 300 [referring to project/management actions as being funded through local GSA funds or future grant opportunities] and GSP, Table PMA-1, p. 9 [further noting that "[i]mplementation of this project may be phased such that the ponds are constructed over a number of years."].) A mere nine (9) months later, in its proposed conditions of approval on the Project, the City attempted to impose all of the costs of this major improvement project, which it now estimates to cost nearly $20 million and require immediate implementation, onto the Keystone	

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		Ranch Project.4 Unlike the single-basin Zacharias Recharge Facility to be supplied by stormwater from new development, the City Perc Pond Project is described as four recharge basins to be supplied by stormwater from Del Puerto Creek and from surface water purchased from the Irrigation Districts. Even though the Master Plan EIR found that the Master Plan development would have no significant impacts to groundwater supplies, the conditions also required Keystone to purchase surface water to "offset" the water demands of new development. No such condition or mitigation was contained in the Master Plan or Master Plan EIR. As recently as January 3, 2025, the City's Community Development Director notified responsible agencies that the VTM Application was being scheduled for hearing based on the Master Plan EIR (and mitigation measures contained therein). Further, in a July 17, 2023 letter to the Stanislaus Local Agency Formation Commission, the City Attorney wrote that a condition requiring the Zacharias stakeholders to "purchase and deliver additional surface water supplies . . . is unnecessary because the Project does not adversely impact the basin's groundwater supply."5 In light of Keystone's objection to fully fronting the $20 million cost of the City Perc Pond Project, refusal to pay for surface water to "offset" its minimal groundwater demand, and opposition to delaying implementation of its Project for at least five (5) plus years, the City Council voted to deny the VTM Application at its April 1, 2025 meeting. On April 2, 2025, the day after the City Council denied the Project, City Staff had a conversation with HCD Staff to discuss the City's Housing Element. A matrix prepared by City Staff indicates HCD's comments and the City's responses. Nowhere does the Staff disclose that the City Council had just denied the Keystone Ranch Project or imposed a five (5) year water moratorium on development in the Zacharias Master Plan area. Instead, in response to HCD's comment on the status of development in the Master Plan, Staff simply states: "Tentative maps not yet recorded for either Zacharias or Baldwin Ranch South Master Plan areas." Staff goes on to state that the realistic capacity for the Master Plan area is based on the Master Plan. The realistic capacity of the Master Plan should be assumed to be zero based on the City's recent action denying the Keystone Ranch Project and imposing a minimum five (5) year moratorium on development in the Master Plan area.	
		2. The alleged infrastructure constraints in the RDHE contradict the information in the November 2024 Public DHE and February 2025 HCD DHE and completely undermine the requirement that Housing Opportunity	A. The sites on the inventory are suitable and available. The City is working collaboratively to address water supply constraints.

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		Sites (including the Keystone Ranch and Lakeside Hills projects) be **"suitable" and "available" for development.** The City is relying on the 719 units Keystone Ranch Project and another Master Plan development—the 2,521 unit Lakeside Hills project—to meet almost all of its Regional Housing Needs Allocation ("RHNA") of 3,716 units. (RDHE, pp. 3-17, 4-16 to 4-17, Figure A-1, Figure A-23, and Table A-3.) Yet, in its latest draft of the Housing Element, the City revised portions of the prior Housing Element to claim that instead of having sufficient water supplies and infrastructure to serve new development (as substantiated by, among others, the Master Plan and EIR), it lacks such supplies and infrastructure. As a result, the RDHE does not contain sites that are "suitable" and "available" for development as required by State law. a. State law requires the Housing Element contain an inventory of sites that are suitable and available for development. By law, the City's Housing Element must include an inventory of land suitable and available for residential development to meet the City's regional housing need by income level. (Gov. Code §§ 65583, 65583.2.) "The housing element must identify specific sites or parcels that are available for residential development. Land suitable for residential development must be appropriate and available for residential use in the planning period." (*Inventory of Suitable Land*, California Department of Housing and Community Development (last visited April 22, 2025), https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/inventory-of-land-suitable.) "A thorough sites inventory and analysis will help the locality determine whether program actions must be adopted to 'make sites available' with appropriate zoning, development standards, and infrastructure capacity to accommodate the new construction need." (*Id.*) "The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period." (*Id.*) Through its revisions to the RDHE, the City has made two of the major projects relied on by its Housing Sites Inventory—Keystone Ranch and Lakeside Hills—not "suitable" and not "available" for residential development within the Sixth Cycle. The City has done so by precluding construction of these housing development projects until the $20 million City Perc Pond Project is fully funded and substantially completed. By the City's own estimates, this will not occur until October 2030, at the very earliest. As a result of these revisions, there are insufficient sites to accommodate the housing allocation for each income category in the City's Sixth Cycle Housing Element.	B. The City prepared the Draft Housing Element in good faith. The City has identified numerous actions to address water supply constraints. Water for affordable units will be prioritized. C. This comment has been noted. Revisions were made in Chapter 3 to Program 1.14 (page 3-17) and Chapter 4 (page 4-11; 4-22; and 2-56) to clarify that the Groundwater Sustainability Program applies the entire Master Plan area.

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		b. The November 2024 Public DHE and February 2025 HCD DHE both confirmed that there were no major constraints on development and that adequate water supplies exist. In earlier versions of the Housing Element, including the one circulated for public review in November 2024 and the one provided to HCD in February 2025, the City reported that the Master Plan area "faces few development limitations, as it is already annexed, vacant, and ready for construction." (HCD DHE, p. 4-14; Public DHE, p. 4-10.) It identifies challenges with securing funding for water and wastewater infrastructure for Master Plan build-out, but notes that "temporary connections to existing water and wastewater systems in the Keystone Ranch and Lakeside Hills area are available to support initial phases of development." (HCD DHE, p. 4-14 and Public DHE, 4-10; *see also* HCD DHE, p. 4-10 and Public DHE, p. 4-9 ["temporary sewer connections will be provided to support early phase development, with the funds collected from these connections dedicated to the infrastructure expansion project" and "[p]otable water and wastewater services are available to commence project development through temporary utility connections."].) As a result, the prior versions of the Draft Housing Element stated that commencement of these housing projects will commence in the Summer and Fall of 2025. (HCD DHE, p. 4-7; Public DHE, p. 4-8.) The City's November 2024 and February 2025 versions of the Housing Element also observe that "Patterson has sufficient water supplies to meet projected demand through 2045" and therefore the City "has sufficient water to serve all identified pipeline projects and identified housing opportunity sites." (HCD DHE, p. 4-23; Public DHE, p. 4-21.) Those versions of the Housing Element cite the City's 2020 Urban Water Management Plan ("UWMP"), which "indicates that Patterson has sufficient water supplies to meet . . . projected water demands over the next 20 years." (HCD DHE, p. 2-50; Public DHE, p. 2-52.) Likewise, the HCD DHE notes that the City's UWMP and Capital Improvement Plan "ensure sufficient wastewater capacity through 2045, with no current capacity issues" and that the City's "wastewater infrastructure will not pose a constraint to meeting RHNA obligations during the 6th Cycle planning period." (HCD DHE, p. 4-23 and Public DHE, p. 4-22; *see also* HCD DHE, p. 2-51 and Public DHE, p. 2-53 [noting "wastewater infrastructure availability is not expected to be a constraint on residential development during the 6th Cycle planning period."].) The City's prior versions of the Draft Housing Element state that Patterson is a stakeholder in the Delta Mendota Subbasin Groundwater Sustainability Plan ("GSP"), which aims to achieve groundwater sustainability by 2040. (HCD DHE, p. 2-56; Public DHE, p. 2-52.) It states that as part of the GSP, "Patterson is	

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		responsible for the Percolation Ponds for Stormwater Capture and Recharge Project . . .." (HCD DHE, p. 2-56; Public DHE, p. 2-52.) As previously noted, the GSP identifies that project as a Tier 3 project, estimated to be operational by 2040, depending on grant funding and environmental review. (GSP, Table PMA-1, p. 9 and Table PMA-2, p. 5.) c. The April 2025 RDHE claims that sufficient water supplies do not exist, at least for Keystone and other Zacharias stakeholders. The RDHE directly contradicts, retracts, and refutes the above statements about the sufficiency of infrastructure and water supplies contained in the November 2024 Public DHE and the February 2025 HCD DHE. While those drafts reported to the public and HCD that the Zacharias Master Plan "faces few development limitations," the RDHE now claims the area "faces development limitations." (RDHE, p. 4-19.)7 The RDHE claims the limitations are due to "developer accountability to contribute fair funding to expand potable water and wastewater infrastructure." (RDHE, p. 4-19.) This is not true, at least as to Keystone. Keystone stands ready, willing, and able to fund its fair share of the backbone infrastructure improvements identified in the Master Plan and Master Plan EIR. What Keystone is not willing to do is completely advance funding for larger City improvements with no essential nexus or rough proportionality to the impacts of its development. Specifically, Keystone refuses to fully fund a 3,000 afy recharge facility to "offset" the Project's 138 afy per year of potable water demand. In the RDHE, the City struck the language about Patterson being responsible for the City Perc Pond Project. (RDHE, p. 2-56.) But the controlling GSP continues to list the City Perc Pond Project as a City project to be supplied with stormwater from Del Puerto Creek and to be implemented by 2040, not 2030 as now claimed by the City. (GSP, Table PMA-1, p. 9 and Table PMA-2, p. 5.) The RDHE cites demand data from the UWMP, but then strikes the next sentence stating that the "plan indicates that Patterson has sufficient water supplies to meet these projected demands over the next 20 years." (RDHE, p. 2-56.) The adopted UWMP continues to say this irrespective of City Staff striking this sentence from the Housing Element. The RDHE claims that under the GSP, there is "a pumping reduction plan in effect which requires the City to reduce its groundwater pumping to 2,626 acre-feet per year by 2030." (RDHE, pp. 2-56, 3-20.) This is not true. The GSP does refer to pumping reduction plan that the agencies adopted to achieve a collective reduction in existing overdraft pumping by 42,000 afy. (GSP, pp. 291, 321; Table PMA-1, p. 6.) For the Northern-Delta Mendota Region as a whole, the reduction in overdraft pumping needed by 2030 is 9,023 afy. (PRP, p. 3.)	

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		Patterson's share of this pumping reduction is 460 afy. (*Id*.) There is no reference to the City Perc Pond Project or to any recharge facility in the PRP let alone to any reduction in groundwater pumping to 2,626 acre feet per year by 2030. Nor does the GSP or PSP pose any constraint on development as incorrectly stated on page 4-34 of the RDHE. Further, the City Perc Pond Project is a water supply project, not a pumping reduction project. And it was not included as an infrastructure improvement in the Master Plan, contrary to the statements on pages 2-56 and 4-12 of the RDHE. The infrastructure improvement in the Master Plan was the Zacharias Recharge Basin. The Master Plan calls for development of the Zacharias Recharge Basin to provide storm drain recharge and flood control to the Master Plan area. (Master Plan, pp. 1, 3, 9-11, 97-100.) The Zacharias Recharge Basin was to be supplied with stormwater from the Master Plan area, not with surface water purchased from the Irrigation Districts or from stormwater from Del Puerto Creek. (Draft EIR, pp. 2-10, 3.9-29, 3.15-26.) And contrary to the estimated $20 million price tag for the City Perc Pond Project, the Zacharias Recharge Basin was estimated to cost $2.1 million. The other options the City claims to be "exploring" include requiring new development to purchase surface water to "offset" its demand through recharge if and when the City Perc Pond Project is completed,8 contribute to an evaluation of the redesign of the stormwater infrastructure for the Black Gulch Drainage Area, apply for funding for design of the City Perc Pond Project, implement a recycled water program, and prioritize conservation. (RDHE, p. 2-57.) While these are described as options the City is exploring, the City Council denied the Keystone Ranch Project because it would not agree to the City's demand that it fully fund the The RDHE claims that "groundwater demand underlying potable water service in the City will need to be offset by groundwater recharge through the Del Puerto Creek Recharge Project" and that "[d]evelopers in the Zacharias Master Plan Area will be required to contribute their fair share of financing for the recharge project." (RDHE, p. 4-12.) But in the RDHE, the City purports to exempt the Baldwin Ranch South project from the requirement to pay for the City Perc Pond Project even though that development is part of the same Master Plan and covered by the same EIR. (RDHE, pp. 3-17, 4-19 to 4-20, 4-22, 4-36, A-69.)9 Such a purported carve-out is directly contrary to the statements made by Staff in its April 1, 2025 report to the City Council on the Keystone Ranch Project. (*See* Staff Report, p. 176 ["The City will require developers of the Master Plan Area to fully fund and construct the Del Puerto Creek Capture and Recharge Project . . . before building permits are issued for the Master Plan Project."] and Packet, p. 177 [City Perc Pond Project "must be funded and	

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		constructed prior to the issuance of building permits"].) The City made similar statements in the Settlement Agreement with the Irrigation Districts to impose the obligation to "fully fund" the City Perc Pond Project on "developers of the Baldwin Master Plan/Zacharias Master Plan Project" and to not issue any building permits "for the Baldwin Master Plan/Zacharias Master Plan Project" until the City Perc Pond Project is "sufficiently completed." (Settlement Agreement, p. 3.) The City states that it needs to reduce pumping by 2,626 afy by 2030. (RDHE, pp. 2-56, 3-20.) As noted above, there is nothing in the GSP or PRP to support this statement. Even if it were supported, this obligation would apply equally to all development, existing and new, including Baldwin Ranch South. Yet, the RDHE states the pumping reduction requirements apply only to Zacharias. (RDHE, p. 3-18.) The City should explain and justify through substantial evidence why there is water for some new developments but not others. Moreover, there is no recognition or acknowledgment in the RDHE of the EIR's conclusion that the Master Plan will reduce pumping by 3,225 afy. (Final EIR, p. 3-70.) The RDHE also purports to strike declaratory statements in the Public DHE and HCD DHE that temporary water connections are available for Keystone Ranch and Lakeside Hills, two of the key sites in the Housing Sites Inventory. (RDHE, pp. 4-19.) Instead now, the temporary water connections are conditioned on Keystone and other Zacharias stakeholders (but apparently not Baldwin Ranch South or any other developers) fully funding the City Perc Pond Project.10 (RDHE, p. 4-19.) The City claims that it will complete infrastructure improvements (including presumably the City Perc Pond Project) by December 2028. (RDHE, p. 3-21.) But, in its agreement with the Irrigation Districts, the City estimates the timing to be October 2030, at the earliest. (*See also* Staff Report, p. 177 [city will use best efforts to ensure completion of City Perc Pond Project by 2030].) The City has precluded and prohibited Zacharias development from moving forward until the City Perc Pond is substantially completed. Moreover, as a market reality, lower income units will not be built in advance of market-rate units as stated on RDHE page 3-19. These assumptions do not reflect reality. As to sewer, the RDHE continues to indicate that the City has initiated the planning process to expand the existing wastewater systems, but then strikes the language about the City actively exploring funding sources to secure a construction contract for these expansions or to seek financing to support the broader development efforts within the Master Plan area. (RDHE, p. 4-11.) Even though the Master Plan EIR found the Master Plan would have no significant impact to wastewater (Draft EIR, pp. 3.15-22 to 3.15-24), the RDHE inexplicably	

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		requires Zacharias development to fund a sewer upgrade to serve the entire Master Plan area. (RDHE, p. 4-12.) This requirement is inconsistent with the Master Plan EIR and imposes a significant and unnecessary constraint on development. In terms of phasing, RDHE struck language about Keystone Ranch being planned for the first phase of development and also the text about early stages not being burdened with infrastructure required for later build out stages. (RDHE, p. 4-12.) Those statements still exist in the Master Plan and Master Plan EIR, irrespective of Staff removing them from the Housing Element. (*See* Master Plan, pp. 114-115 [identifying Keystone Ranch as the first to develop and noting that "[t]he phasing of the infrastructure will be planned so that initial project construction will not be burdened with construction of improvements not needed until later in the project build-out"]; Master Plan, p. 98 [identifying Keystone Ranch as an area to be developed "prior to the installation of the major storm drain facilities (lakes, FEMA basin, and recharge basin) . . .."]; and Draft EIR, p. 2-13 [identifying Keystone Ranch as among the first to develop and noting that the "phasing plan reflects the economic factors associated with the costs of new infrastructure and, therefore, the areas that require the least costly infrastructure would develop first."].) More fundamentally, the only Zacharias developments included in the Housing Sites Inventory are Keystone Ranch and Lakeside Hills.	
		3. As evidenced by its denial of the Keystone Ranch Project on April 1, 2025, the City is not committed to approving additional housing development. The statement that the City "is continuing to work with the developer on the vesting tentative maps" is not true or accurate. (RDHE, p. 4-8.) The City denied the Keystone Ranch Project on April 1, 2025 after delaying it for years. The RDHE should be updated to reflect the City's denial of the Keystone Ranch Project. (RDHE, pp. C-9 to C-10.) Likewise, the actions the City claims it is undertaking to ensure prompt development of Keystone Ranch and Lakeside Hills ring hallow. (RDHE, p. 3-19.) For instance, the City contends that it will conduct outreach with property owners. Yet City Staff and officials refused to meet with Keystone representatives to discuss the VTM Application. The claim that fees will be reduced and permitting processes expedited also does not reflect Keystone's reality. (RDHE, p. 3-19.) The RDHE admits that Patterson "has the highest total fees for single-family and multi-family dwellings among nearby jurisdictions," with fees of $60,000 per single-family unit, which is	This comment has been noted.

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		approximately 50 percent higher than the next highest jurisdiction in Stanislaus County. (RDHE, pp. 2-41 to 2-42.) Keystone has been trying to get its Project approved for over 15 years—the City Council denied it on April 1, 2025. The City refused (and continues to refuse to acknowledge) the validity of Keystone's SB 330 Preliminary Application by imposing the City Perc Pond Project cost and other fees and charges not in effect when the Preliminary Application was submitted, adding an estimated $40 million in costs to the Project. City Staff would not meet or offer technical assistance on navigating regulatory requirements. At the hearing where the City Council voted to deny the Project, the Mayor claimed that Keystone was seeking preferential treatment by submitting a SB 330 Preliminary Application. Finally, in response to Keystone's comments on the Public DHE that the City must adopt and apply objective development standards to all housing development projects, not just multi-family housing projects, the response by City Staff was comment noted. (RDHE, p. C-7.) This is not sufficient. The City must revise the Housing Element to commit to adopt objective development standards applicable to all residential development, as required by law. (Gov. Code §§ 65589.5(j), 66300(b)(1)(C).)	
May 29, 2025 Revised Draft Housing Element (published on April 16, 2025)		<u>YIMBY Law</u> Dear Housing Accountability Unit, YIMBY Law is a 501(c)3 non-profit corporation, whose mission is to increase the accessibility and affordability of housing in California. YIMBY Law sues municipalities when they fail to comply with state housing laws, including the Housing Element Law. I write to express concerns with the City of Patterson's April 16, 2025 Housing Element Draft, submitted to the Department of Housing & Community Development on May 5, 2025. Its actions and commitments are irreconcilable, indicating a clear lack of candor with the Department that, if left unchanged, cannot support a finding of substantial compliance with state law. The City's recent April draft update stands in glaring contrast with the City's many previous public representations about its ability to provide more housing without constraints based on water supply or groundwater. The City of Patterson would have HCD believe that between February 2025 – when the City submitted its first (overdue) draft Housing Element Update, which stated that the City had no water supply or infrastructure constraints on providing new housing – and April 2025 when the City submitted the current draft, Patterson abruptly suffered a drought of disastrous proportions, but not one that will affect housing in any	The City prepared the Draft Housing Element in good faith and has since updated it to more accurately reflect the current status of water availability for future development. To address water supply constraints, the City is actively implementing a range of strategies outlined in Programs 1.14 and 1.15. These include aggressively pursuing funding opportunities to construct essential infrastructure, providing flexibility in permit timing and infrastructure phasing, requiring developers to contribute fair share payment toward necessary infrastructure improvements, and coordinating annually with property owners and developers to accelerate residential development. These efforts are designed to address water supply challenges while prioritizing and facilitating the development of new housing. The Public Works Department has recently secured substantial funding to help resolve water supply challenges, and the Community Development/Planning Division remains committed to pursuing additional funding opportunities and supporting developers in securing project-specific resources.

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		way – other than the large Zacharias & Baldwin Master Plan area that the City is relying on to meet most of its current RHNA obligations. Local governments are required to identify and mitigate constraints to development via their Housing Elements. Patterson's February 2025 draft Housing Element Update identified no inadequacies from water supply. This was further attested to in the 2022 Zacharias & Baldwin Ranch Master Plan Environmental Impact Report, which found no significant impacts to water supply from development in the area. Indeed, in seeking LAFCO approval for the annexation of the Master Plan area in July 2023, the City affirmatively refuted any questions about possible adverse impacts of new housing development on water supply and groundwater. What changed between February 2025 and April 2025 was the project sponsors refusing to pay $20 million for a new City water supply project. The Keystone Ranch proposal would bring 719 units of single and multi-family housing to the City, and was denied by the City Council on April 1st for declining to fund a $20 million project that previous city documents stated was unnecessary. On April 1, 2025, Patterson's City Council denied the development, stating the City needs at least a 5 year moratorium on new housing development (but not apparently on commercial or industrial development) in order for the private housing proponents to construct new City recharge facilities to address a suddenly-claimed "water shortage." Remarkably, the City Staff and Planning Commission had just unanimously recommended conditional approval of the Keystone Ranch housing development in February 2025. Therefore, the vast majority of sites identified in the April draft are now unbuildable until at least 2030. As cities are obligated to identify constraints to housing, they are also obligated to identify adequate sites to accommodate their RHNA. Patterson is either unable to properly identify constraints to development, or unable to identify sites that are adequate for housing. In either reality, its efforts are not substantially compliant with state housing law. The City of Patterson is placing its compliance on inherently contradictory principles: it has adequate water for sites that cannot be developed without a $20 million facility. Its officials have identified all significant constraints to development, other than ones that would prevent anything from moving forward until at least 2030. Without seriously reconsidering its draft Housing Element or its practices towards development proposals, I respectfully submit to your staff that Patterson's Housing Element cannot be found in compliance with state law, substantial or otherwise.	
May 29, 2025		YIMBY Law	These comments have been noted.

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Revised Draft Housing Element (published on April 16, 2025)		Dear Patterson City Council, We are pleased to submit this letter of support of the proposed Keystone Ranch project. YIMBY Law is a 501(c)(3) non-profit corporation, whose mission is to increase the accessibility and affordability of housing in California. YIMBY Law closely monitors projects to ensure that all relevant state laws are properly applied, including the Housing Accountability Act and AB 1633. Should the City fail to follow these laws, YIMBY Law will not hesitate to file suit to ensure state housing policies are enforced. The Keystone project will consist of 719 units of housing, comprising 506 single-family and 213 multi-family units. California Government Code § 65589.5, the Housing Accountability Act, prohibits localities from denying housing development projects that are compliant with the locality's zoning ordinance or general plan at the time the application was deemed complete, unless the locality can make findings that the proposed housing development would be a threat to public health and safety. Fully aware that Patterson could make no such findings, Patterson's officials have resorted to lying and breaking the law to prevent this project from moving forward. It was only after a lawsuit that the City accepted the vesting application at all. That application was met with three incompleteness determinations, based upon items not included in the submission checklist, new information that was not mentioned in prior incompleteness letters, and subjective design standards that are not applicable. All such denials were illegal under California law.[2] Explicitly, a city denies a project when it "fails to cease a course of conduct undertaken for an improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of the proposed housing development project, that effectively disapproves the proposed housing development project."[3] After an appeal, the application was deemed complete, only to be met with $40 million in fees and 159 conditions of approval as a measure to illegally make the project unbuildable.[4] Conditioning a project so that it is infeasible amounts to a denial under the HAA. Many of these fees and conditions apply to water	

[2] See CA Gov. Code § 65943(a)-(b) and § 65589.5(h)(6)(F).
[3] CA. Gov Code § 65589.5(h)(6)(D).
[4] Patterson City Council Staff Report, April 1, 2025, Item 8.1.a [the "Staff Report"], p. 176 ["The City will require developers of the Master Plan Area to fully fund and construct the [City Perc Pond Project] . . . before building permits are issued for the Master Plan Project."]; Staff Report, p. 177 [City Perc Pond Project "must be funded and constructed prior to the issuance of building permits"]; VTM Application Condition No. 4 at Staff Report, p. 208 ["Prior to issuance of the first building permit in the Master Plan areas, the [City Perc Pond Project] shall be sufficiently completed for the delivery of water for recharge at the Del Puerto Creek Project location."]; Staff Report, pp. 223-224 [listing impact fees that are approximately $20,000 to $30,000 more per unit than those fees in place when the SB 330 Preliminary Application was submitted.]

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		infrastructure that, curiously, City documents stated would be unnecessary until this project came before the Council. The governing Zacharias & Baldwin Ranch Master Plan Environmental Impact Report (EIR) stated that there would be no significant impacts to groundwater supplies. The draft Housing Element staked a substantial portion of the RHNA on this site, and raised no issues with water supply. A July 2024 report stated Patterson would construct its separate City Perc Pond Project via other state and local funding sources for only $7.8 million.[5] Many of these new conditions were not in place at the time of the project's preliminary application, in further violation of SB 330's protection of vesting rights.[6] The contradictions between these statements and those to HCD threatens Patterson's compliance with state law, which will subject it to the Builder's Remedy until it reconciles its statements with its actions. Greater consequences come the longer Patterson uses illegal means to forestall this project. The City could face severe penalties from a finding of bad faith, on top of being found responsible for attorney's fees and court costs for an improper denial. Among the new conditions applied to this project is the request for a supplemental EIR, despite a finalized EIR for the Master Plan. CEQA only allows revisions to completed EIRs where there are substantial changes to the project or new information is discovered which was not, and could not, have been known originally.[7] Deciding that individual public officials don't like a specific proposal is not a legal reason to call for a new EIR. This project has been in process for many years before, during, and after the prior EIR was completed and certified. Faced with an application that complies with local zoning and state land use laws, and has its own funding, materials, land, and project proponent willing to bring much needed housing to the city of Patterson, city officials waste innumerable staff resources and tax dollars to break the law and stop it from being built. Under California law, you must approve the application, or else make findings to the effect that the proposed project would have an adverse impact on public health and safety based on written standards in effect when the application was deemed complete. Should Patterson and its officials fail to	

[5] Delta-Mendota Subbasin Groundwater Sustainability Plan ("GSP"), Table PMA-2, p. 5; see also GSP, p. 300 [referring to project/management actions as being funded through local GSA funds or future grant opportunities] and GSP, Table PMA-1, p. 9 [further noting that "[i]mplementation of this project may be phased such that the ponds are constructed over a number of years."].

[6] CA. Gov Code § 65589.5(o).

[7] Pub. Res. Code § 21166; CEQA Guidelines § 15162.

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		comply with the law, YIMBY Law will not hesitate to take legal action to ensure that the law is enforced. I am signing this letter both in my capacity as the Executive Director of YIMBY Law, and as a resident of California who is affected by the shortage of housing in our state.	
August 13, 2025 Revised Draft Housing Element (published on August 6, 2025)	Public Participation	Rutan & Tucker, LLP 1. Failure to comply with statutorily-required public participation procedures. As a preliminary matter, the City has failed to comply with the public noticing procedures associated with the public review of Draft Housing Elements. Government Code Section 65585(b) (1) plainly requires that for any subsequent revisions to a draft Housing Element, "the local government shall post the draft revision on its internet and shall email a link to the draft revision to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting the draft revision to the department." HCD further informed the City of this requirement in its May 2, 2025 comment letter to Bryan Stice on the City's previous draft Housing Elements ("HCD Letter"). (HCD Letter, p. 2 [further noting that "[p]ublic participation in the development, adoption and implementation of the housing element is essential to effective housing planning."]) In my April 23, 2025 comment letter to you, I specifically asked to be included "on the notification list for any correspondence to and from HCD regarding the Patterson 6th Cycle Housing Element and for any subsequent drafts of the Housing Element. Despite this request, the City failed to email me the August 6th RDHE. I found it by happenstance when reviewing the City's website. At minimum, the City cannot proceed with providing the RDHE to HCD without first providing the proper notice to me and other interested parties that requested it. Moreover, the City's response to our April 23, 2025 letter is woefully inadequate. In response to my 12-page letter with detailed comments on the deficiencies in the April DHE, the City's primary response is: "Comment Noted." It claims in a conclusory fashion that the sites on the inventory are "suitable and available" and that it is "working collaboratively to address water supply constraints." There is no evidence, let alone substantial evidence, to support that claim. It notes that the RDHE clarifies that the GSP "applies to the entire Master Plan area." The GSP applies to the entire City. Indeed, at the April 1, 2025 City Council hearing, Gage Marchini, an attorney with the City Attorney's office, admitted that the GSP (and associated regulations) apply to "any new development." In reality, as evidenced by its approval of non-residential projects and its denial of the	The City has extended the public review period by seven days—from August 15 through August 22—and updated the Housing Element webpage to reflect this change. In addition, the City has issued email notices to all interested parties to address the earlier oversight.

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		Keystone Ranch housing Project, the City is selectively enforcing the GSP on just one housing developer—Keystone Ranch.	
	Constraints	2. Comments on Chapter 2-Housing Constraints Analysis In added text on pages 2-44 to 2-45, the RDHE states that projects located in areas with limited or no existing infrastructure "require extensive improvements to support new development. These projects face longer timelines, higher costs, and necessitate financing from developers due to the need to construct major infrastructure components such as water, sewer, electrical, and roadway systems." In contrast, it states that a project like Villages of Patterson ("VOP") is situated near existing infrastructure allowing it to connect to existing systems. As far we know, VOP is not connected to or situated near any existing recharge basin. In denying the Project, the City cited to and relied on the GSP. It stated that under the GSP, it was under a mandated pumping reduction program such that it could not authorize additional pumping for any project unless and until that project offset its groundwater use, such as by purchasing surface water and recharging that water. If the City's position is that these new water measures apply because of the GSP, then all new developments must adhere to these requirements, not just some. As noted above, Mr. Marchini acknowledged this point at the April 1st hearing on the Keystone Ranch Project. The RDHE states that the Del Puerto Creek Project (also known as the City Perc Pond Project) was included as part of the Master Plan. (RDHE, pp. 2-54, 3-23, 4-14.) This is not true. There is no reference whatsoever to the Del Puerto Creek Project in the Master Plan. Instead, the Master Plan describes the Zacharias Recharge Basin, a single basin proposed to capture stormwater from Zacharias development only. (Master Plan, p. 98 [further noting that the Keystone Ranch Project can proceed in advance of that recharge facility].) By comparison, the GSP describes the City Perc Pond Project as a Tier 3 project (not needed until 2040), to be supplied by stormwater runoff from Del Puerto Creek, and to be funded by the City and State grant funds. (GSP, Chapter 15, Table PMA-1, p. 9 and Table PMA-2, p. 5.) It is evident the City is attempting to coopt and convert the proposed Zacharias Recharge Basin—a single basin proposed to capture and recharge stormwater from Zacharias developments only—and expand it into the four-basin Del Puerto Creek Project to recharge surface water from all new development, while trying to get Master Plan developers to pay for it. (See, RDHE, p. 2-54 [require "water demand from future developments to be offset by the purchase of surface water which will be diverted for recharge in the Del Puerto Creek Project basins" and	The Groundwater Sustainability Plan (GSP) for the Northern & Central Delta-Mendota Region is available here - https://deltamendota.org/final-gsp-documents/ The Northern Delta-Mendota Region Pumping Reduction Plan (PRP) is available here - https://www.stancounty.com/er/groundwater/pdf/Northern-Delta-Mendota-Region-Pumping-Reduction-Plan.pdf The City is subject to the requirements of the GSP and PRP, which require reductions to groundwater pumping. The City is in the process of developing clear policies for how new development can meet the requirements of the GSP and identifying alternative water supply options. Housing Element Program 1.15 Water Supply to Development addresses the Groundwater Sustainability Plan. City master plans and corresponding environmental impact reports (for example, the Zacharias/Baldwin Ranch Master Plan) identify specific projects and mitigation measures required for new development, including the specific projects mentioned by the commenter. Developers are always required to construct or contribute their fair share toward the water and stormwater infrastructure required for new development.

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		"[u]pon completion of the Del Puerto Creek Project, the City will recharge the total amount of purchased and delivered surface water to meet the increase in water demand as a result of development projects."].) Because all development is subject to the GSP, those other developers must pay their fair share for the expansion of the recharge facility. To date, the City has only attempted to condition Keystone to fully front the costs of the Del Puerto Creek Project. And it continues to approve other developments without imposing any conditions requiring contribution of fair share costs towards the Del Puerto Creek Project.	
	Programmatic Actions	3. Comments on Chapter 3-Housing Action Plan The RDHE includes certain new programs, including Program 1.14 (Facilitating Development of the Zacharias & Baldwin Ranch Master Plan Areas), Program 1.15 (Water Supply to Support Development), and Program 1.17 (Diversify and Expand the Housing Stock). In short, the "programs" added to the RDHE appears to just "parrot" the language of HCD's May 2025 comment letter with no meaningful analysis or detailed plan of action. These programs fail to reflect that any water issue is a citywide one that applies to all developments residential and non-residential alike, whether located inside or outside the Master Plan area.	The GSP and associated PRP contain significant limitations for groundwater pumping. The City is in the process of developing clear policies for how new development can meet the requirements of the GSP and identifying alternative water supply options. The City is required to comply with the GSP and PRP, and further ensure new development is subject to appropriate conditions and mitigation for any new groundwater demand. Housing Element Program 1.15 Water Supply to Development addresses the Groundwater Sustainability Plan.
	Programmatic Actions	3a. Program 1.14-Facilitating Development of the Zacharias & Baldwin Ranch Master Plan Area The City denied the Keystone Ranch Project, identified in the Master Plan as the very first phase of development, because Keystone would not agree to fully fund construction of the estimated $20 million Del Puerto Creek Project. Under Program 1.14, the City states it is committed to "facilitate the phasing of infrastructure to enable timely residential development to meet the City's RHNA." (RDHE, p. 3-21; *see also* RDHE, p. 3-23 [Program 1.15 likewise states the City "will provide flexibility in permit timing relative to needed infrastructure improvements and facilitate the phasing of infrastructure to enable timely residential development to meet the City's RHNA"].) While this appears to a be a positive statement in terms of allowing housing development to proceed, it is entirely unclear what it means or how it will be implemented. For instance, what infrastructure will be phased and how will it impact the 3,200 Master Plan units relied on by the Housing Element to meet the City's RHNA figure? How can the City allow other non-Master Plan development to proceed absent payment of its fair share towards the Del Puerto Creek Project? What	There is no moratorium on housing in the City. The City is subject to the requirements of the GSP and PRP, which require reductions to groundwater pumping. For the Zacharias / Baldwin Ranch Master Plan (Master Plan), the Environmental Impact Report (EIR) was subject to a lawsuit and a settlement agreement. This commenter is not the only developer of the Master Plan, and all developers of the Master Plan are subject to the same mitigation requirements and conditions. Per Housing Element Program 1.15, the City has initiated studies to determine scopes of work, feasibility, and development timelines for its identified water supply projects. The study results will further inform the specifics for what new development will be required to build or contribute to these projects. City funding is limited, however. It was always the

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		does "timely residential development" mean especially given that the City is nearly two years delinquent in having its 2023-2031 Housing Element certified and Keystone has tried for over 10 years to get a residential housing project approved. Underscoring this point, elsewhere, the City admits it is only committing to ensuring the timely construction of infrastructure to facilitate housing for occupancy "within the eight-year planning cycle." (RDHE, p. 3-22.) Highlighting our concerns with the RDHE's loose and ill-defined concept of infrastructure phasing, the RDHE states the City will conduct a mid-cycle review in December 2027 and if "infrastructure improvements are not funded or underway" by January 2028, it will "consider" alternative land use strategies such as identifying alternative sites and amending zoning or other land use documents to make suitable land available for development to meet its RHNA. (RDHE, p. 3-22; *see also* RDHE, p. 3-24.) Elsewhere, the City says it is targeting "completion" of the infrastructure improvements by December 2027 and that it will monitor Project approvals in obtaining 3,503 residential building permits by June 2027. (RDHE, p. 3-23.) So far the City has zero permits issued with less than two years to go. It denied the 719-unit Keystone Ranch Project in April after postponing a decision on it for several years. It is unclear what infrastructure improvements are being referred to here. Is it just stormwater? The Master Plan detailed the stormwater phasing as proceeding in early stages from local retention basin to middle stages consisting of the Lakeside Hills lake features to later phases comprised of a flood control basin and the Zacharias Recharge Basin. Indeed, the Master Plan included a phasing schedule to ensure that the early-phased development was not saddled with substantial infrastructure costs not needed until future phases are proposed. It specifically identified Keystone Ranch as the very first Master Plan project to be developed "prior to the installation of the major storm drain facilities (lakes, FEMA basin, and recharge basin . . .." (Master Plan, p. 98.). To the extent the City is referring to the Del Puerto Creek Project when it refers to infrastructure improvements, as we believe to be the case, the City seems to be perpetuating the moratorium on housing that begin with its denial of the Keystone Ranch Project. In other words, the City is saying that no Master Plan development will be issued building permits until the Del Puerto Creek Project is funded, designed, approved, and constructed. (*Cf.* RDHE, pp. 4-21 to 4-22 ["To secure potable water supplies for the project, [Zacharias] developers will need to contribute their fair shares to finance the Del Puerto Creek Recharge Project and the project will need to be constructed."].) Moreover, any GSP obligations would apply citywide. So how will identifying and changing the land use designation of other sites meaningfully change anything	intent and requirement that new water and storm drainage projects required for new development will be paid for by developers. While advancing buildout of the General Plan and meeting the RHNA, the City must still ensure compliance with the GSP and reduce its groundwater pumping. The City is highly supportive of new development and is actively working to address and clarify infrastructure challenges. The City disagrees with claims of arbitrary application of infrastructure requirements to this commenter. All new development is subject to the requirements of applicable Master Plans, applicable EIRs pursuant to CEQA, effective Development Agreements, and the GSP.

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		when those sites would also not be able to go forward absent the Del Puerto Creek Project? From a practical standpoint, where and how would the City find an additional 3,200 units to replace the Master Plan units currently included in its Housing Sites Inventory? The City must revise this language to allow early phased Master Plan development counted on by the City to meet its RHNA (such as Keystone Ranch) to proceed pending future development of the regional-serving Del Puerto Creek Project. The City has approved major warehouse projects pending such future development so certainly it can allow much-needed housing projects to proceed as well. Similarly, Program 1.14 states that the City "commits to charg[ing] developers their respective fair share payments as part of the larger needed improvements to the infrastructure required for development of Master Plan Area including water, sewer, and stormwater." (RDHE, p. 3-21.) What does fair share payment mean? The cost of the Del Puerto Creek Project has been described by the City as anywhere between $7.8 (in the July 2024 GSP) to $17.9 million (in a March 2025 Settlement Agreement) plus land cost. If the Del Puerto Creek Project will recharge surface water purchased by other non-Master Plan developers, how will they be assessed their fair share? Clarify that this stormwater infrastructure is not "required" solely for Master Plan development nor solely to facilitate development of the Master Plan as implied on pages 3-21 and 4-14 of the RDHE. (*See also* RDHE, p. C-16 [City states revisions were made to Chapters 3 and 4 of the RDHE "to clarify that the Groundwater Sustainability Program applies (sic) to the entire Master Plan area."].) The City states that it will make its "best efforts" to begin design and environmental review of the Del Puerto Creek Project no later than December 2026. (RDHE, p. 3-21.) Why will it take the City nearly 18 months to begin the design and environmental review process for this project when it has been considered by the City since at least 2018? Why has the City not made any substantial progress on that project since that time? What housing projects will be allowed to proceed pending completion of the Del Puerto Creek Project and why? Conversely, which housing projects will not be allowed to proceed pending completion of the Del Puerto Creek Project and why not? The RDHE acknowledges that "potable water supply is a challenge for new development city-wide." (RDHE, p. 4-6; *see also* RDHE, p. 4-41 [noting that the GSP applies city-wide].) As such, if retained in the Housing Element, the reference to the GSP and Sustainable Groundwater Management Act ("SGMA") should be placed in a separate program that applies citywide, not just to Master Plan development. For instance, the RDHE states that the City is required to	

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		monitor and enforce compliance with the GSP pursuant to State law and that Program 1.14 "is a necessary component of the City's accountability and compliance with the GSP." The RDHE also states that the City will work with other agencies to develop a regional recharge solution for stormwater per the SGMA. If the City is required to reduce groundwater pumping and not allow any net new pumping to occur per the GSP, as it claims, then the program of requiring new developments to purchase surface water and recharge it to the groundwater basin has to apply citywide to all new development, whether inside or outside the Master Plan, and whether the development is residential or non-residential in nature. Similarly, the reference to regional recharge solutions applies to all developments citywide, not just those in the Master Plan. The City also claims that it will continue to "review potable water supply portfolios to ensure adequate water availability." (RDHE, p. 3-22.) Groundwater levels in Patterson have remained constant and unchanged for the last 20 years, including recent drought years. (Department of Water Resources ["DWR"], 20-Year Groundwater Level Trends, May 2025.) Moreover, most monitoring wells in Patterson show normal or above normal groundwater levels with some wells showing all-time high levels. (DWR, Groundwater Level Conditions, May 2025.) Further evidence of adequate water supplies is contained in the City's Master Plan EIR. The Master Plan EIR finds that the Master Plan will decrease water demand by 3,225 afy compared to the existing agricultural uses and concludes that the Master Plan will not have a significant impact to groundwater supplies. (Draft EIR, pp. 3.15-5 to 3.15-22 [finding Impact US-1 to be less than significant with no mitigation required]; Draft EIR, pp. 3.9-23 to 3.9-26 [finding Impact HYD-2 to be less than significant with no mitigation required]; Draft EIR, pp. 3.9-33 to 3.9-34 [finding Impact HYD-5 to be less than significant with no mitigation required; *see also* Final EIR, p. 3-70].) By comparison, the Project's estimated potable water demand is 138 afy. The Master Plan EIR cites the City's Urban Water Management Plan and the Master Plan's Water Supply Assessment, both of which find that Patterson has sufficient water supplies to meet the Master Plan's water demand over the next 20 to 30 years during normal, dry, and multiple dry years. (Draft EIR, pp. 3.15-20 to 3.15-21, 4-13 to 4-14; Final EIR, pp. 3-39 to 3-40; *see also* Master Plan, p. 97 [Table 8 shows sufficient supplies for Project water demand currently and in future years].)	
	Programmatic Actions	3b. Program 1.15-Water Supply to Support New Development	

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		On page 3-23, the RDHE states the GSP "establishes a pumping reduction plan which requires the City to reduce its groundwater pumping to 2,626 [afy] by 2030." Please indicate where in the GSP it imposes this obligation. We have searched the document and see no such reference. We do see a reference to a 460 afy pumping reduction by 2030 in the Pumping Reduction Plan ("PRP"). That is indicated to be a "target" that "may be adjusted and adapted based on model updates and the availability of additional data and measurements." (PRP, p. 3.) Explain how this is a requirement and, if so, what has the City done to achieve its 92 afy reduction by 2025? What other groundwater sustainability agencies subject to the PRP have required new development to purchase offsetting surface water and pay for recharge basins? The text goes on to state that the City can still continue to support additional development through the construction and implementation of the Del Puerto Creek Project. (RDHE, p. 3-23.) The GSP identifies the Del Puerto Creek Project (also known as the City Perc Pond Project) as a Tier 3 water supply project (not needed until 2040). It also indicates that pumping reduction objectives by 2030 are to be achieved through specified Tier 1 and Tier 2 pumping reduction projects. Explain how and why this Tier 3 project is needed to meet the Tier 1 and Tier 2 pumping reduction objectives. Program 1.15 is supposed be about water supply citywide, but purports to require only Master Plan developers to make fair share payments for the City's Del Puerto Creek Project. (RDHE, p. 3-24 ["The City commits to charge developers their respective fair share payments as part of the larger needed improvements to the infrastructure required for development of the Master Plan Area including water, sewer, and stormwater."].) If the GSP requires no net new pumping, as the City contends, then all developments (including those outside the Master Plan and including non-residential development) must pay for surface water and for their fair share of the Del Puerto Creek Project. The City also purports to require all development projects with potable water demand to fund an evaluation of the redesign of the existing storm water infrastructure associated with the Black Gulch Drainage Area. (RDHE, pp. 2-54, 3-24.) Explain the nexus between this requirement and new development not located in this drainage area.	The GSP requires reducing extraction of groundwater in the Delta-Mendota Subbasin by approximately 42,000 acre-feet per year (AFY) by 2030 (GSP, Chapter 15, p. 291). The City's share of that reduction requires that the City reduce its groundwater pumping by 460 AFY by 2030 (Pumping Reduction Plan, page 3, Table 2). This figure is based on modeling of the City's total aquifer pumping during the years 2019-2023 (Pumping Reduction Plan, page 3). Pumping reductions may be adjusted based on model updates and availability of additional data. All new development is subject to the City's enforcement and implementation of the GSP and PRP requirements. In support of the City's implementation of the GSP and PRP requirements, the City is evaluating alternatives for the capture of stormwater for recharge. The City is considering alternatives such as participation in cooperative recharge programs with other partnering groundwater sustainability agencies in the Northern Delta-Mendota Subbasin and the study of regional stormwater management to provide recharge, including capture of stormwater from the Blach Gulch Drainage Area. Housing Element Program 1.15 Water Supply to Support Development and Program 3.1 Water and Energy Conservation Opportunities identify actions to support groundwater sustainability.
	Programmatic Actions	3c. Program 1.17-Diversify and Expand the Housing Stock Explain why this program to diversify and expand the City's housing stock is focused solely on the Zacharias area. (RDHE, p. 3-26.) How does promoting "missing middle" housing in just one geographic part of the City advance the	Program 1.17 targets areas identified as High Resource by HCD's AFFH Data Viewer. Specifically, it states: "This effort will focus on areas south of Zacharias Road, west of State Route 33, north of Elfers Road, and east of Baldwin Road, including

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		goals of affirmatively furthering fair housing? Explain the basis for determining that the vacant, undeveloped Zacharias area is a high resource and high opportunity area. Per the State's 2025 AFFH Mapping Tool, the Zacharias area is located in a Moderate Resource area and is located adjacent to Low and Moderate Resource areas. Similarly, explain the basis for determining that all affordable housing for special needs and disabled persons should be accommodated in the Master Plan area. Where are the support services, commercial services, and transit facilities to support such populations? Further explain why the existing Master Plan land use plan with a mixture of low, medium, and high density residential housing density housing, and objectives, including neighborhood and housing diversity, do not already accomplish the goal of providing diverse housing types. (Master Plan, pp. 11, 13, 14.) On April 1, 2025, the Patterson City Council denied the 719-unit Keystone Ranch Project with its 213 high-density residential units. Will this be acknowledged as a barrier to housing production, increasing housing capacity, and providing a variety of housing types?	the City's master planned areas." See Figure A-11 in the Revised Draft Housing Element for an illustration of TCAC Opportunity Areas in Patterson.
	N/A	4. Comments on Chapter 4-Housing Resources and Sites Inventory The City denied the Keystone Ranch Project on April 1, 2025 after delaying it for years. The RDHE should be updated to reflect the City's denial of the Keystone Ranch Project. For instance, the RDHE continues to say the area is slated for infrastructure improvements beginning in Summer 2025 and development in Fall 2025. (RDHE, p. 4-9.) The statement that the City "is continuing to work with the developer on the vesting tentative maps" is false. (*Id.*) The City denied the Keystone Ranch Project on April 1st. Keystone Ranch is proposed for a diversity of housing units, including both single-family and multi-family residences. On page 4-10, the RDHE refers to the affordability assumptions for the Keystone Ranch Project. It accurately portrays the multi-family portion of the Project as being proposed at densities that are deemed appropriate to accommodate housing for lower-income households, i.e. at least 20 units per acre. (Gov. Code § 65583.2(c)(3)(B)(iii).) We appreciate the RDHE's acknowledgement that temporary sewer connections are necessary to support new housing development and the City's fulfillment of its RHNA. (RDHE, p. 4-13.) RDHE page 4-42 likewise acknowledges that temporary sewer and water connections "will support the initial phases of development in the Zacharias and Baldwin Ranch Master Plan area." Zacharias and Baldwin Ranch were approved as one Master Plan under the same Master Plan EIR. Yet, under the potential limitations to development, the	At the April 1, 2025 City Council meeting, the City Council denied the Vesting Tentative Map because Keystone Ranch LLC would not agree to the required mitigation measures to address the changed circumstances created by the GSP and PRP. Without adherence to such mitigation, a further supplemental EIR would be required before the City could legally approve the Vesting Tentative Map in accordance with CEQA. The City's denial of a single project application is not a permanent denial. Keystone Ranch LLC may resubmit its project application at any time. Further, Keystone Ranch LLC is not the only developer of the Zacharias / Baldwin Ranch Master Plan (Master Plan), and all developers of the Master Plan are subject to the same mitigation requirements. The City disagrees with claims of arbitrary application of infrastructure requirements to this commenter. All new development is subject to the requirements of applicable Master

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		RDHE only discusses Zacharias development. (RDHE, pp. 4-21 to 4-22.) The recharge basin is not being used for stormwater for Zacharias only. Instead, now the City is proposing a larger basin to recharge surface-water purchased by all new development. There is no logical reason why Baldwin Ranch South and all other new developments citywide (including the recently approved Patterson Logistics Center and Project Zach) should not be subject to the same fair share obligation. On page 4-24, the RDHE states the developers of Baldwin Ranch "will be required to contribute their fair share of financing for improvement projects to meet the state-imposed timeline to mitigate water shortages." Explain whether the Baldwin Ranch South developers and others will need to contribute their fair share to finance the Del Puerto Creek Project and that project will need to be constructed in order for them to secure potable water supplies for their project. (RDHE, p. 4-21.) If that is not the case, please explain the City's position and cite to and support it with substantial evidence. On page 4-43, the RDHE states that all other sites in the inventory (except Zacharias) have adequate existing infrastructure and do not require the construction of new or expanded facilities. But the RDHE also inconsistently states that the Del Puerto Creek Project is needed to recharge the surface water purchased by all new developments to offset their groundwater usage.	Plans, applicable EIRs pursuant to CEQA, effective Development Agreements, and the GSP.
	TCAC Opportunity Areas	5. Comments on Appendix A-Assessment of Fair Housing The RDHE claims that the vacant, undeveloped Master Plan areas are "high resource" areas. How and why was this determination made? As noted above, per the State's 2025 AFFH Mapping Tool, the Zacharias Master Plan area is located in a Moderate Resource area and is located adjacent to Low and Moderate Resource areas. By comparison, the Baldwin Ranch Master Plan does appear to be located in a High Resource area. Explain how the Baldwin Ranch South developer and City will prioritize affordable housing in this High Resource area.	The Housing Element relies on the state-approved HCD AFFH Data Viewer for the TCAC Opportunity Area analysis. According to the HCD AFFH Data Viewer, the city consists of Moderate and High Resource areas; there are no Low Resource areas within the city limits. See Figure A-11 in the Revised Draft Housing Element for an illustration of TCAC Opportunity Areas in Patterson.
August 20, 2025 Revised Draft Housing Element (published on August 6, 2025)		YIMBY Law Dear Patterson Planning Commission and City Council, YIMBY Law is a 501(c)3 non-profit corporation, whose mission is to increase the accessibility and affordability of housing in California. YIMBY Law sues municipalities when they fail to comply with state housing laws, including the Housing Element Law. The August 2025 draft Housing Element makes many substantial commitments in order to meet state requirements, but it also makes commitments which are	This comment has been noted. The Revised Housing Element addressed the items outlined in HCD's May 2, 2025 findings letter. The City is diligently working to address water infrastructure challenges and provide further information about implementation of required infrastructure improvements.

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		insubstantial and unlikely to result in new housing. California HCD's letter in May of 2025 noted many concerns, including the need for realistic capacity for development and an analysis of environmental and government constraints. Related to those constraints, HCD specifically noted a need to analyze how improvement costs would impact total development cost and support realistic capacity of development. The draft is internally inconsistent, unsupported by substantial evidence, and reliant on programs that are either vague or deferred until 2028, far too late to realistically meet RHNA obligations. Infrastructure Concerns The RDHE repeatedly cites potable water supply as a citywide challenge. Yet, the City has used this issue selectively, denying the Keystone Ranch Project (719 units, including 213 high-density units) in April 2025 on the grounds that it must first fund an estimated $20 million water supply project. The City relied on the Groundwater Sustainability Plan (GSP) to justify this denial, despite the fact that the GSP's pumping reductions are listed only as targets subject to revision based on future data. That GSP ostensibly applies to the entire City, but Patterson is moving forward with new warehouse *and* residential projects without imposing comparable water supply conditions. The February 2025 draft Housing Element and the 2022 Master Plan EIR found no significant water supply impacts from Keystone or related projects. In 2023, the City represented to LAFCO that annexation of the Master Plan areas would not adversely affect water supply. If major infrastructure improvements *are* necessary to support new housing, those sites cannot logically or legally be considered suitable or available to meet Patterson's RHNA. While the Housing Element vaguely asserts the City will seek fair share payments from developers, there is no discussion of what that cost is or how it will impact the feasibility of development. This is besides the fact that Patterson has already denied the Keystone Ranch Project, and cannot rely on a denied project for 719 units of its RHNA. Adequacy of Housing Element Programs Housing Element programs cannot be adequate if they make no genuine, enforceable commitments. Program 1.11 states that if Patterson does not complete necessary zoning amendments by December 2025, it will identify alternate sites. Program 1.15 similarly commits to alternative sites if infrastructure improvements are not underway by January 2028. This reasoning is illogical and circular. If the sites are not suitable because of lack of adequate infrastructure (e.g., a recharge basin), how does identification of alternative sites address the infrastructure issue? After denying the Keystone Ranch	As stated in previous responses, the City disagrees with claims of arbitrary application of infrastructure requirements to Keystone Ranch LLC. Regarding development within the Zacharias / Baldwin Ranch Master Plan (Master Plan), the requirements of the EIR and the applicable settlement agreement apply to all developers and properties within the Master Plan. This comment has been noted. The Housing Element programs have timelines, quantified objectives, performance metrics, geographic targeting, responsible agencies, funding sources, and implementing policies.

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		More fundamentally, the Housing Element must identify suitable and available sites to meet the City's RHNA. Those sites must have sufficient water, sewer, and dry utilities available *or* be included in an *existing* plan program to secure sufficient water, sewer, and dry utilities to support housing development. (Gov. Code § 65583.2(b)(5)(B).) The identification of such sites cannot be deferred or postponed to a future time. Even if the timing could be put off, how will the new sites be identified, what criteria will be used, and how will the public and HCD have input into this process? Program 1.14 states that "[i]f infrastructure improvements are not funded or underway by January 2028, the City will consider alternative land use strategies, such as identifying alternative sites with appropriate densities to support lower-income units, amending zoning or other land use documents to make suitable land available for housing development to meet the RHNA or increasing permitted residential densities to ensure no net loss." "Considering" alternative land use strategies is no commitment at all. Patterson could consider those strategies and decide to use none of them. This program only requires Patterson to agendize the item at some City meeting but binds it to no definite, enforceable action. Again, it makes a commitment to nothing other than, theoretically, taking unidentified actions in the future. Unless it decides not to. Program 1.17 commits the City to identifying opportunities to promote a greater variety of dwelling types, and remove barriers to housing production within Zacharias and Baldwin Ranch Master Plan. California already has a statutory program for cities to identify and remove barriers to housing. That's the Housing Element process. The Element is already required to identify constraints to housing and set strategies to reduce those constraints.[8] Patterson's Housing Element commits to future actions where it will identify adequate sites for housing, identify and reduce constraints to development, and create strategies to support residential housing. In essence, the Housing Element only commits to creating a future Housing Element, containing little actionable or enforceable strategies of its own. Without significant revision the Housing Element cannot support Patterson's RHNA responsibilities, and cannot be found in substantial compliance with state law.	Sites included in the Master Plan are available for development in the City's RHNA. Keystone's project is the not the only area of the Master Plan available for housing development. Keystone may also refile its project application. Housing Element Chapter 2 Housing Constraints Assessment identifies governmental, non-governmental, environmental, and infrastructure constraints, and corresponding programs to address them are identified in Chapter 3 Housing Action Plan.
August 22, 2025 Revised Draft Housing Element	Infrastructure/Water Availability	Rutan and Tucker LLP Supplemental comments on August 6, 2025 Revised Draft Housing Element 1. Groundwater Supplies	Comment noted. Please refer to the City's responses to this commenter's comment letter from August 13, 2025.

[8] CA Gov. Code § 65583(a)(5)-(a)(6) & (c).

Date Received/ Draft Iteration	Topic	Comment	Response
(published on August 6, 2025)		The RDHE states that under the 2024 Delta-Mendota Subbasin Groundwater Sustainability Plan ("GSP"), "there is a pumping reduction plan in effect which requires the City to reduce its groundwater pumping to 2,626 acre feet per year by 2030." (RDHE, p. 2-52; see also RDHE, p. 3-23.) Please cite to the specific pages or portions of the GSP which contains this language. Further, please explain how and why the City has nonetheless been able to approve over four million square feet of warehouse and distribution center space and the 162-unit Villages of Patterson-Olive Avenue project without requirements or conditions for a recharge basin, moratorium on development until the recharge basin has been constructed, and/or purchase of surface water. The RDHE states the City is aggressively pursuing multiple projects to diversify its water supply and "resolve supply issues" by mid-cycle. (RDHE, p. 2-54.) Please confirm by mid-cycle you mean 2027 and explain in detail the supply issues, what projects the City is aggressively pursuing to resolve them, and the status of the City's funding, design, environmental, and construction of those projects. Also, the RDHE states that the City is actively seeking funding opportunities and "recently secured $10 million in funding." (RDHE, p. 2-54.) Please explain in detail the source of this $10 million in funds, the date funding was secured and from which agencies, and which project(s) it is earmarked/allocated for. The RDHE also states the City "has identified and is exploring multiple options to support planned and future development, while remaining in compliance with the 2024 GSP." (RDHE, p. 2-54.) Are these "options" referencing the same activities described as "projects" above? What criteria and process will the City employ in determining which options to implement? To date, the City seems to have unilaterally and on an ad hoc and inconsistent basis imposed all of the options on one project (Keystone Ranch), none of the options on other projects (Patterson Logistics Center and Project Zach), and one of the options on another project (Villages of Patterson-Olive Avenue). One of the options requires developers to offset their water use by the purchase of surface water which will be diverted for recharge in the Del Puerto Creek Capture and Recharge Project. Please confirm that this project refers to the one identified in the GSP as the City of Patterson Percolation Ponds for Stormwater Capture and Recharge Project. (GSP, Chapter 15, Table PMA-1, p. 9 and Table PMA-2, p. 5; *see also* RDHE, p. 4-41 [referring to this project as a GSP project] and HCD DHE, p. 2-50 [stating "Patterson is responsible for the Percolation Ponds for Stormwater Capture and Recharge Project . . .."].) Please explain the water supply source, timing, and funding assumptions for this project per the GSP.	Under SGMA, Groundwater Sustainability Agencies (GSA) are obligated to manage groundwater resources within their designated basins to achieve long-term sustainability pursuant to adopted GSPs. New development may therefore be impacted by local GSA requirements, such as groundwater pumping limits, fees or water availability constraints. The City is required to comply with SGMA and enforce the GSP and PRP, including by requiring appropriate conditions of approval and mitigation measures for new development which increases water demand in the City. The City is committed to diligently working to address all infrastructure challenges that may affect housing development.

Date Received/ Draft Iteration	Topic	Comment	Response
		Further, where is this recharge basin located? It appears to refer to the 30-acre parcel in *private* ownership north of the Zacharias Master Plan. If so, what steps, funding arrangements, or other activities has the City taken to acquire that property? The City indicates that it will, among others, expand its Water Quality Control Facility by installing a membrane bioreactor superstructure, allowing it to treat wastewater for non-potable reuse or transfers with lower aquifer pumpers. (RDHE, p. 3-21.) Explain the estimated amount of non-potable and potable water expected to be generated by this project. In Program 3.1, the RDHE states that the City will implement water use restrictions during periods of drought and require water-efficient designs and landscaping. These programs should already exist per state law. (*See*, *e.g.*, Urban Water Management Planning Act, CalGreen Building Code, and Model Water Efficient Landscape Ordinance Regulations.) Assuming that is the case, explain what is new or novel about these features.	
	Infrastructure	2. Temporary Sewer Connections The adopted Master Plan states that temporary sewer connections will be made to the east through Vicki Lynn Lane and Ward Avenue. (Master Plan, pp. 103-105.) However, the RDHE claims that temporary sewer will be supported by tying into an existing sewer main to the west along Keystone Pacific Parkway. (RDHE, pp. 4-14, 4-42.) What sewer capacity analysis supports this statement? Is the City planning to amend the Master Plan to identify a new sewer connection route? If not, why not?	For further information about the sewer plans and requirements for the Zacharias / Baldwin Ranch Master Plan, the commenter is referred to the Zacharias / Baldwin Ranch Master Plan document – available here - https://www.pattersonca.gov/658/Master-Plan-EIR-Documents
	Housing	3. Affordable Housing Assumptions Under Program 1.5, the RDHE states that the City will dedicate staff to enforce the Inclusionary Housing Ordinance to promote affordable housing production instead of in-lieu fee payments. What evidence does the City have that lack of staffing is an issue or problem? Has the City done any analysis or assessment to indicate the amount of funds needed to produce an affordable housing unit and the level of local, state, and federal funding required? The RDHE states that accessory dwelling units ("ADU") provide additional housing units and may be an alternative source of affordable housing for lower income households and seniors. (RDHE, p. 2-22; *see also* RDHE, p. 4-23 [referring to junior accessory dwelling units ("JADU") as a "cost-effective way to expand affordable housing options through new construction"].) It notes that ADUs may be permitted on single-family and multi-family lots and that the City is limited in regard to the development standards that it can impose on ADUs. (*Id.*)	Comment noted. The City is working on increasing staffing to better serve the community at large. The City's population is expected to increase substantially through full development of the Zacharias / Baldwin Ranch Master Plan and other existing master plans under development. Many low-income units and in-lieu fee collections are anticipated to result. Staffing will need to adjust to accommodate the additional review, monitoring, and compliance obligations in accordance with the City's inclusionary housing ordinance. The Housing Element Site Inventory includes Keystone Ranch, Lakeside Hills, and Baldwin Ranch South development areas within the Master Plan area. Based on correspondence received on December 5, 2024, no accessory dwelling unit (ADU)

Date Received/ Draft Iteration	Topic	Comment	Response
		The RDHE states that the City will require that at least 15 percent of new single-family units in the Master Plan area include either an accessory dwelling unit ("ADU") or junior accessory dwelling unit ("JADU"). (RDHE, p 3-22.) However, Tables 4-2, 4-5, and 4-7 only apply these ADU/JADU assumptions (and assumed affordability levels) to Lakeside Hills and Baldwin Ranch South. (RDHE, pp. 4-3, 4-8 to 4-9, 4-13, 4-18 to 4-19, 4-24, 4-26.) No similar assumptions are made for Keystone Ranch or any other Master Plan development. Why not? Further, the RDHE states that it applies the Inclusionary Housing Ordinance percentages to the Keystone Ranch and Lakeside Hills developments. (RDHE, p. 4-12.) No such assumptions were applied to Baldwin Ranch South, another site in the inventory. (RDHE, p. 4-26.) Why not? The RDHE also inconsistently states that Keystone Ranch is "set for lower-and moderate-income units" while omitting any reference to above moderate-income units. (RDHE, p. 4-10.) As noted in our August 13th letter, the High Density Residential portion of Keystone Ranch has densities exceeding 20 units per acre when the permitted density range is 12.1-25 units per acre. Still the RDHE states that "higher intensity development could be supported." (RDHE, p. 4-16.) Yet, Baldwin Ranch South has permitted densities of 5.1 to 12 units per acre, but is only assigned a density of 5.1 units per acre. Why is no similar statement made about that project supporting higher intensity development. (RDHE, p. 4-26.)	assumptions are applied to Keystone Ranch. Accordingly, unit assumptions for Keystone Ranch remain consistent with the Master Plan. The Housing Element has been revised to state that Keystone Ranch is expected to accommodate housing across all income levels (page 4-10). The Master Plan's High Density Residential designation permits 12.1–25.0 dwelling units per acre (du/ac) and assumes a density of 17.1 du/ac. The Housing Element applied this Master Plan assumption for density. This comment has been noted. The Housing Element conducted a focused exercise to meet the RHNA. The Inclusionary Housing Ordinance will still apply to all new development, including Baldwin Ranch South.
	Impact Fees	4. Impact Fees Under its discussion of Development Impact Fees, the RDHE acknowledges that the City "has the highest total fees for single-family and multi-family dwellings among nearby jurisdictions . . .." (RDHE, p. 2-38; *see also* RDHE, p. 2-39 [showing City's fees as approximately two to three times that of nearby agencies].) On pages 2-36 and 2-37, the RDHE states that it adopted updated impact fees in October 2024 per Resolution 2024-59. The RDHE should note that a lawsuit challenging the validity of the fees is currently pending, and as a result of that lawsuit, the City is enjoined from applying or enforcing those fees. (*See Building Industry Assn. of the Greater Valley v. City of Patterson*, Stanislaus County Superior Court Case No. CV-24-010405, Ruling on Motion for Issuance of Injunctive and Declaratory Relief: "The Court hereby ENJOINS Respondents City of Patterson, Mayor Michael S. Clauzel, and the Members of the City Council of the City of Patterson from in any way implementing or attempting to enforce or apply any of the fees and exactions included in Resolution No. 2024-59, Resolution No. 2024-65 and the amended Quimby Act	The City acknowledges that the 2024 adopted development impact fee schedule is subject to a preliminary injunction pending the outcome of the cited superior court case (*Building Industry Assn. of the Greater Valley v. City of Patterson*, Stanislaus County Superior Court Case No. CV-24-010405). The preliminary injunction prohibits the City from imposing the recently-adopted development impact fees until the case is decided. Table 2-11 in the Revised Draft Housing Element has been revised to report the fee schedule enacted on January 1, 2021 (page 2-39).

Date Received/ Draft Iteration	Topic	Comment	Response
		Ordinance, Ordinance No. 878.") Further the fees in Table 2-11 are listed as the 2024 fees, but the notes to this table indicate the fees are the 2021 fees.	

SOURCE: City of Patterson, 2025

C.4 Housing Needs Survey

The City prepared and distributed an online Housing Needs Survey requesting feedback on a variety of housing topics, including current housing conditions and opportunities for future housing in Patterson. The survey was provided in both English and Spanish. The City's Housing Element webpage[9] provided a link to the Housing Needs Survey, which was available for public input from September 2024 to December 2024. There were 41 survey participants. The following are key concerns expressed by survey respondents:

- Interest in accessory dwelling units;
- Housing for seniors and persons with disabilities;
- Expanded housing types to accommodate small households;
- Rental assistance; and
- Rehabilitation and maintenance assistance.

Responses from the Housing Needs Survey have been used to inform the policies and programs included in Chapter 3 of this Housing Element. A summary report of the Housing Needs Survey is included as Attachment A to this appendix.

C.5 Tribal Consultation

Pursuant to Government Code §65352.3, formal consultation was conducted with representatives from the following tribes that are present and active in Stanislaus County. Consultation is in process.

Amah Mutsun Tribal Band
Valentin Lopez, Chairperson
P.O. Box 5272
Galt, CA 95632

Amah Mutsun Tribal Band
Ed Ketchum, Vice-Chairperson
P.O. Box 5272
Galt, CA 95632

North Valley Yokuts Tribe
Katherine Perez, Chairperson
P.O. Box 717
Linden, CA 95236
canutes@verizon.net

North Valley Yokuts Tribe
Timothy Perez, Tribal Compliance Officer
P.O. Box 717
Linden, CA 95236
huskanam@gmail.com

Southern Sierra Miwuk Nation
Sandra Chapman, Chairperson
P.O. Box 186
Mariposa, CA 95338

[9] https://www.pattersonca.gov/150/City-of-Patterson-Housing-Element

Southern Sierra Miwuk Nation
Jazzmyn Gegere, Director of Cultural Resource Preservation
P.O. Box 186
Mariposa, CA 95338

Tule River Indian Tribe
Neil Peyron, Chairperson
P.O. Box 589
Porterville, CA 93258

Wuksachi Indian Tribe/Eshom Valley Band
Kenneth Woodrow, Chairperson
1179 Rock Haven Ct.
Salinas, CA 93906

C.6 List of Contacted Organizations

This section provides contact information for organizations and agencies in the Stanislaus region that were contacted during housing element preparation.

California Housing Partnership
Danielle M. Mazella, Senior Research Manager
dmazzella@chpc.net

Disability Resources Agency for Independent Living
(209)-521-7260

Stanislaus County Clerk-Recorder
(209)-525-5250

C.7 City of Patterson Contact List

This section provides contact information for City of Patterson officials that were contacted during housing element preparation.

Bryan Stice
Community Development Director
209-895-8074
bstice@ci.patterson.ca.us

Joel Andrews
City Planner
209-895-8024
jandrews@ci.patterson.ca.us

Teresa Rodriguez
Associate Planner/Housing Program Coordinator
209-895-8026
trodriguez@ci.patterson.ca.us

Housing Needs Survey
September 16 – December 5, 2024

A
Attachment

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HOUSING NEEDS SURVEY A-1

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Housing Needs Survey

A.1 Introduction

From September 16, 2024 to December 5, 2024, the City of Patterson conducted a bilingual Housing Needs Survey in English and Spanish to gather insights from residents, business owners, visitors, and individuals working in the city. The survey consisted of 22 targeted questions designed to assess the demographic composition of Patterson, evaluate affordable housing needs, and identify potential solutions to address those needs. It was made accessible online through the City's Housing Element webpage,[1] and outreach efforts included an announcement during the November 12 Joint Planning Commission and City Council Community Workshop.

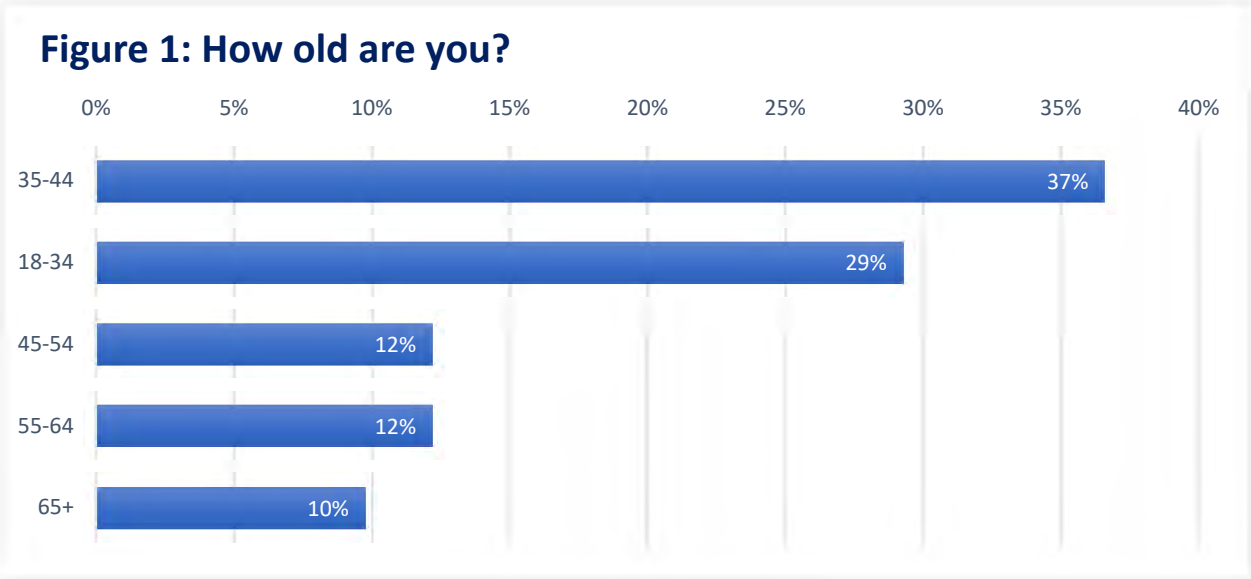
A total of 41 responses were received from a self-selected sample of community members, reflecting the perspectives of those actively engaged in the Housing Element update process. While the self-selection bias and limited sample size restrict the generalizability of the findings, the responses provide meaningful qualitative insights. The following section presents a summary of the survey results.

A.2 Online Survey Results

Respondent Demographics

The City collected a total of 41 responses to the survey. Figure 1 illustrates the age distribution of survey respondents, ranging from 18 to 65 years and older. The highest proportion of responses was received from individuals aged 35 to 44, whereas the lowest participation was observed among respondents aged 65 and older. The age distribution of survey respondents suggests greater engagement in housing issues among respondents aged 35 to 44, likely due to life events such as homebuying or family formation. Lower participation from those 65 and older may reflect residential stability or accessibility challenges in survey outreach.

[1] https://www.pattersonca.gov/150/City-of-Patterson-Housing-Element



As shown in Figure 2, 49 percent of respondents identified as Hispanic or Latino, 37 percent as White, 5 percent as two or more races, and 2 percent each as Native Hawaiian or Other Pacific Islander, Black or African American, and Asian.

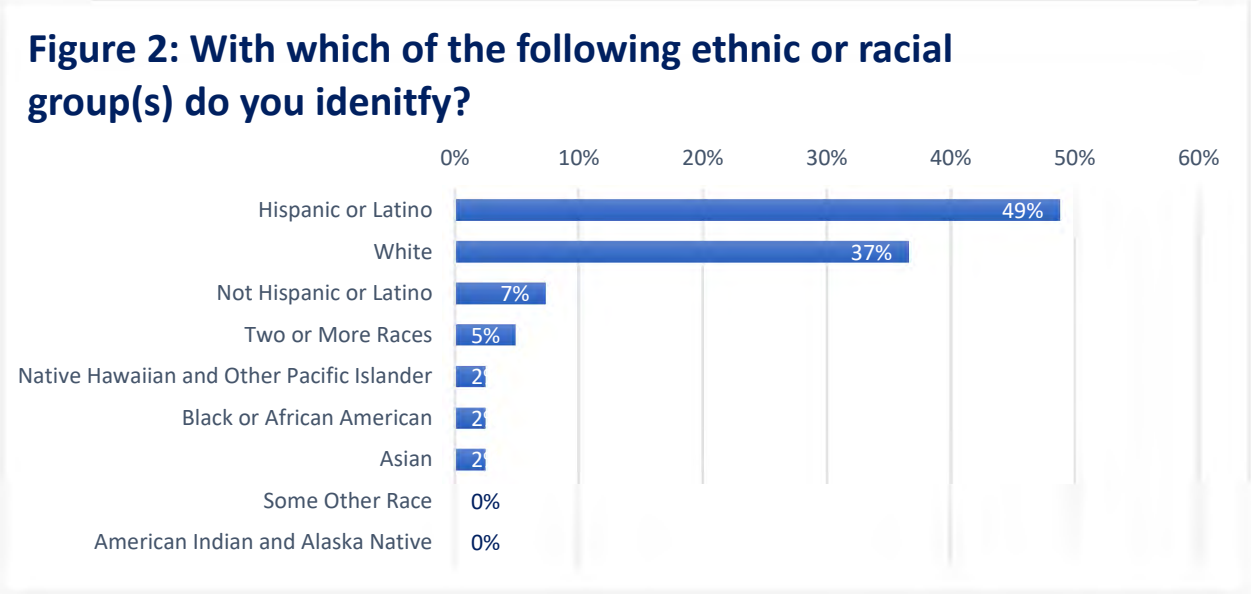


Figure 3 illustrates the distribution of survey respondents based on various demographic identifiers. The largest group, at 41 percent, did not select any of the listed options. Among those who identified with specific categories, the most represented group was female heads of household (29 percent), followed by seniors aged 55 and older (22 percent) and single-parent households (17 percent). Individuals living with disabilities accounted for 12 percent of respondents, and 5 percent

identified as unhoused. This data highlights the diverse backgrounds of respondents while also emphasizing the substantial proportion who did not associate with the provided categories.

Figure 3: With which of the following do you identify? Select all that apply.

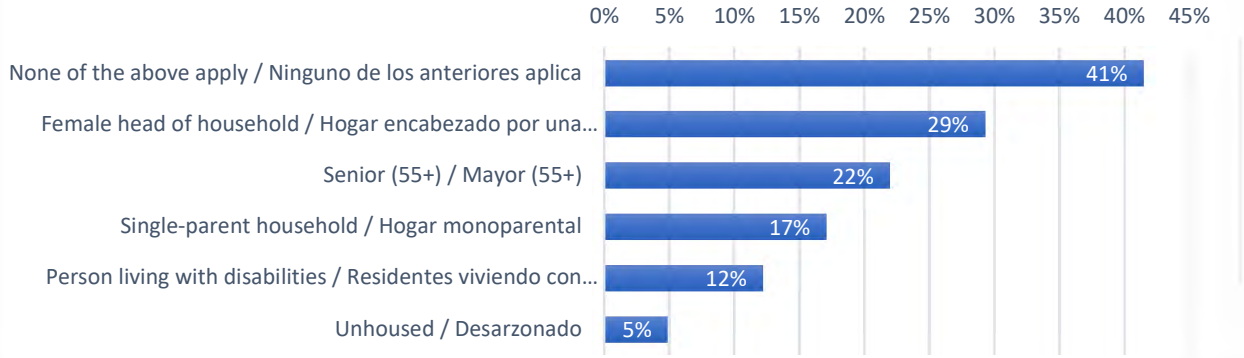
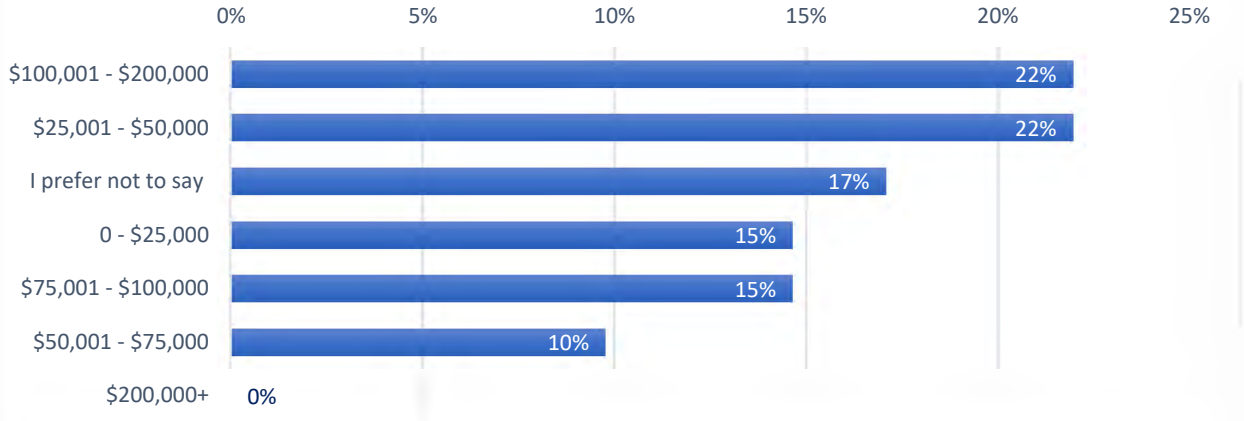


Figure 4 reports the annual income distribution of survey respondents. The largest proportion of respondents (22 percent) reported an income between $25,001 and $50,000, while an equal percentage (22 percent) chose not to disclose their income. Other notable income brackets included $0-$25,000 (17 percent), $50,001-$75,000 (15 percent), $75,001-$100,000 (15 percent), and $100,001-$200,000 (10 percent). No respondents reported incomes above $200,000. This data highlights a concentration of respondents in lower to moderate income brackets, with a significant portion opting not to disclose their financial information.

Figure 4: What is your annual income?



Respondent Housing Occupancy and Living Characteristics

Figure 5 demonstrates that the majority of respondents (93 percent) are residents of Patterson, with smaller proportions identifying as working in Patterson (41 percent), owning property (37 percent), or owning/operating a business (10 percent). This indicates that the survey primarily reflects the views of local residents.

Figure 5: Which of the following describes you? Check all descriptions that apply to you.

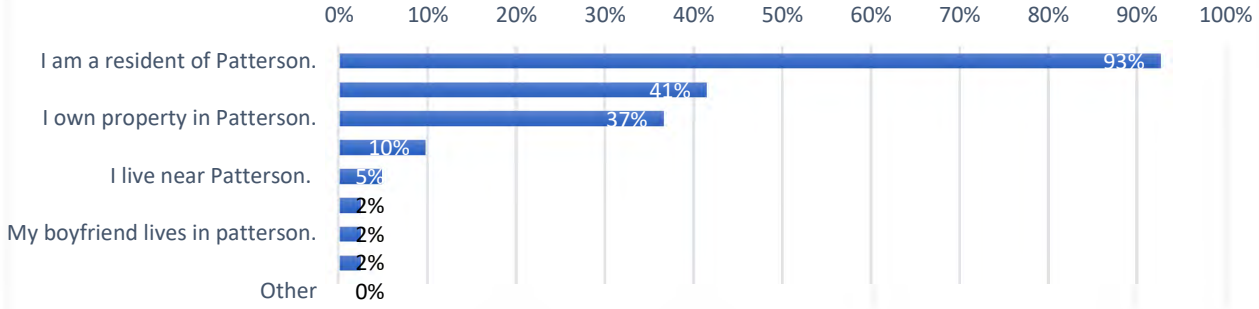


Figure 6 summarizes respondents' current housing situations. Nearly half (49 percent) own their homes, while 29 percent rent. Smaller proportions live with friends or family, pay rent plus utilities to family, or reside in transitional housing. Less than 1 percent of respondents identified as landlords or unhoused. This suggests that most respondents have stable housing, with homeownership being the most common situation.

Figure 6: Which best describes your current housing situation?

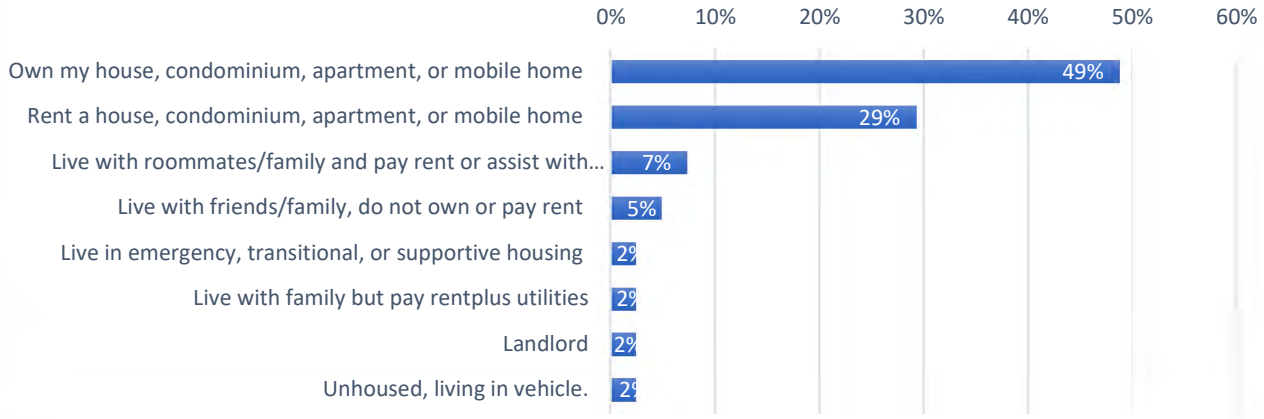


Figure 7 highlights the types of housing occupied by survey respondents. The majority (71 percent) live in single-family homes, followed by 15 percent in mobile homes. Other housing types, including condominiums, duplexes, and accessory dwelling units, account for smaller proportions. This suggests that single-family homes dominate the housing landscape among respondents, with limited representation of alternative housing options.

Figure 7: Which type of housing do you currently occupy?

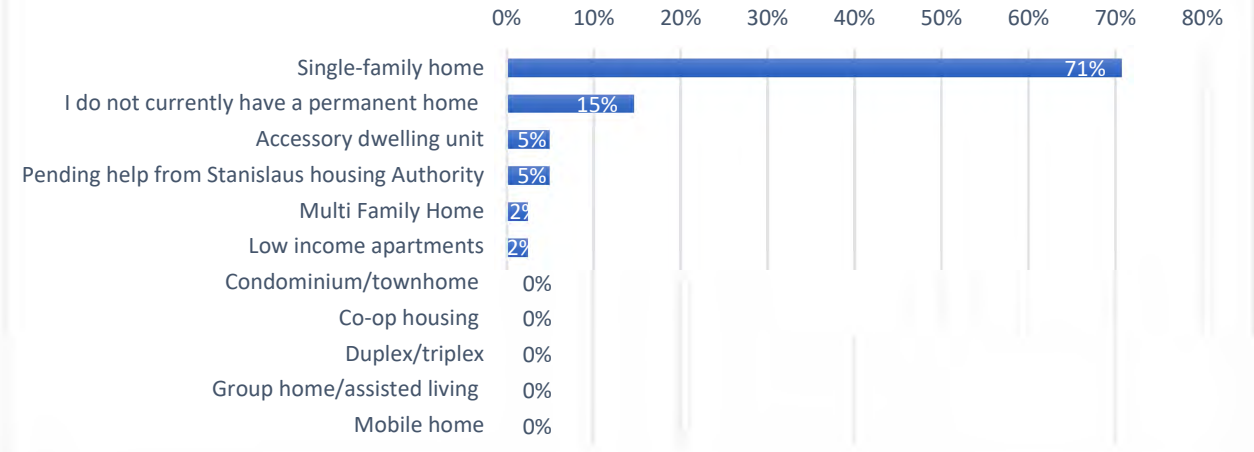


Figure 8 outlines respondents' current living situations. Nearly half (49 percent) live with a spouse or significant other, making it the most common arrangement. Smaller proportions live alone (12 percent), in multigenerational households (12 percent), with parents (10 percent), or with housemates (5 percent). Notably, 10 percent of respondents identifies as being single-parent households living with children. This suggests a predominance of traditional couple households among respondents.

Housing Needs

Figure 9 ranks housing needs in the City of Patterson based on priority according to respondents' input. The highest priorities, each identified by 41 percent of respondents, include the need for lower-priced rental options, lower-priced ownership options, and homes affordable to first-time buyers. Moderate priorities include housing for seniors (34 percent) and a greater variety of housing types (34 percent). Lower priorities include housing for large families (29 percent), workers in Patterson (29 percent), and residents experiencing homelessness (27 percent). The lowest-ranked option indicates that all current housing needs in Patterson are already being met, at 17 percent. This

indicates a strong focus on affordability and accessibility for lower-income and first-time buyers as key housing priorities.

Figure 8: Which best describes your current living situation?

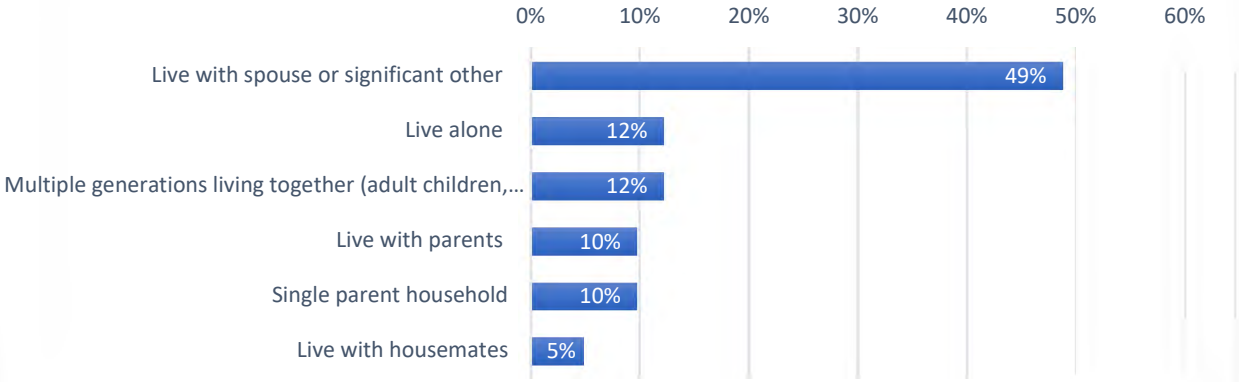


Figure 9: Rank the housing needs facing the City of Patterson from highest priority (1) to lowest priority (10).

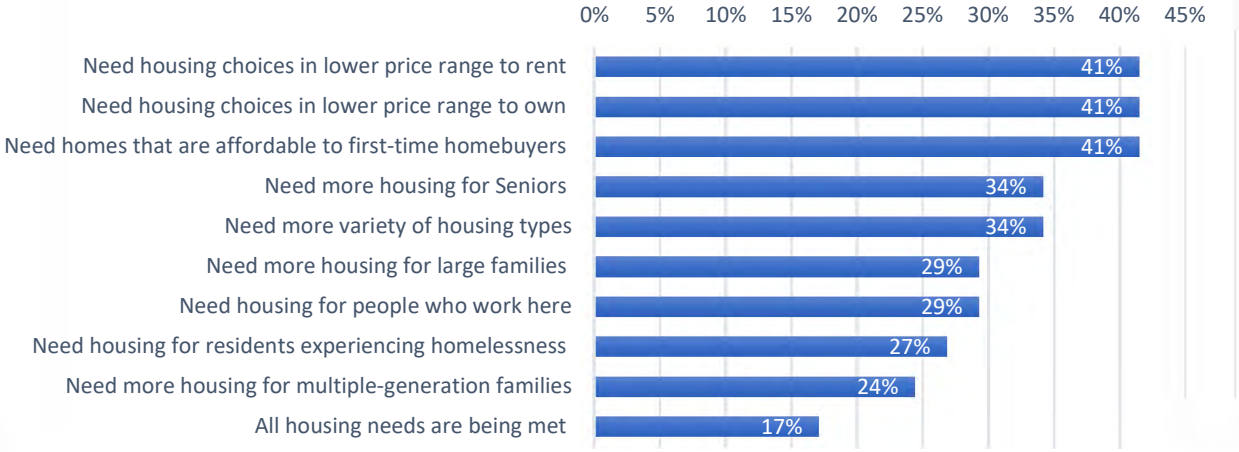


Figure 10 highlights factors preventing respondents from obtaining permanent housing in Patterson. Affordability was the most significant barrier, cited by 63 percent of respondents, followed by a lack of housing variety (34 percent) and a limited housing supply (29 percent). Employment opportunities were also identified as a barrier by 22 percent, while 32 percent of respondents indicated none of the listed factors applied. This underscores affordability as the primary challenge for securing permanent housing in Patterson.

Figure 10: What factors preven you from obtaining permanent housing in Patterson? Select all that apply.

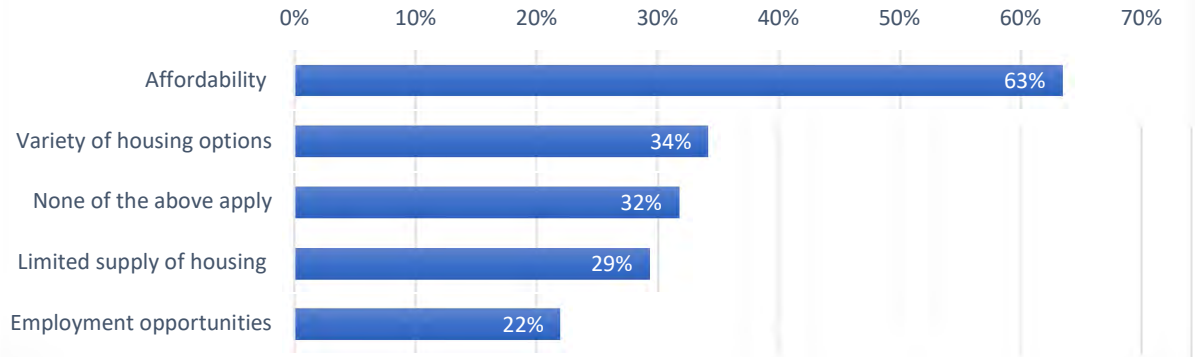


Figure 11 identifies housing types respondents believe would be most successful in Patterson. The highest-ranked option was single-story houses and condos (66 percent), followed by larger custom homes (59 percent), residential care facilities (59 percent), duplexes/triplexes/townhomes (56 percent), and accessory dwelling units (49 percent). These preferences suggest a strong demand for diverse housing options, with a particular emphasis on smaller, flexible units and multi-family housing to address community needs.

Figure 11: Which five housing types do you believe would be most successful in Patterson today? Select your top five choices.

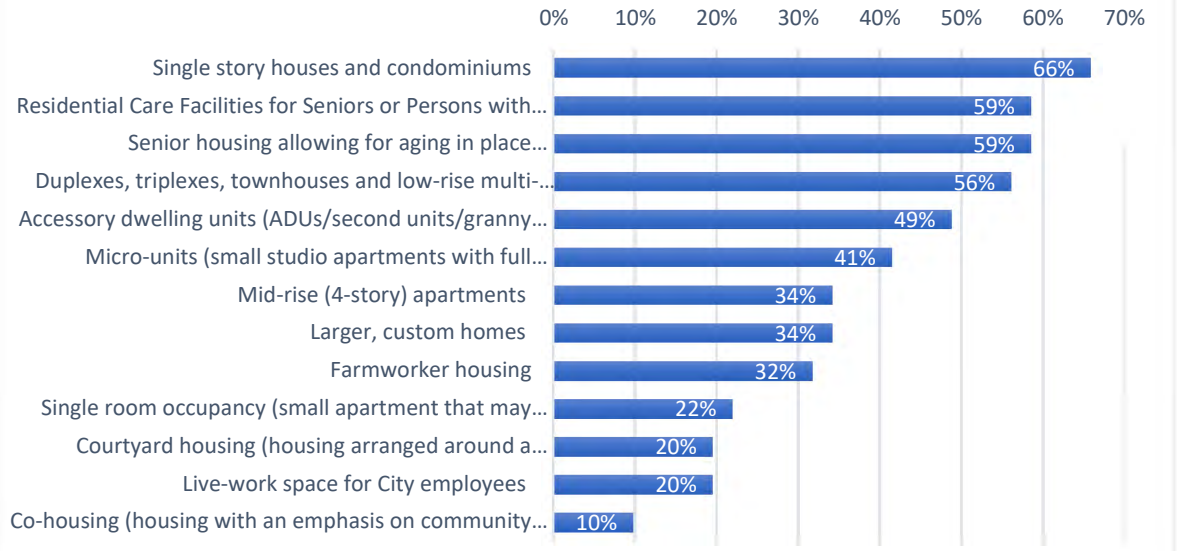


Figure 12 outlines the most important accessory dwelling unit (ADU) assistance services chosen by respondents. Financial assistance with construction was the highest priority, selected by 70 percent of respondents, followed by pre-approved ADU floorplans (60 percent) and homeowner one-on-one consultations (55 percent). Educational webinars on ADU development was also significant (48 percent). These results highlight the need for financial and technical support as key to promoting ADU development in Patterson.

Figure 12: Which Accessory Dwelling Unit (ADU) assistance services are most important? Select three.

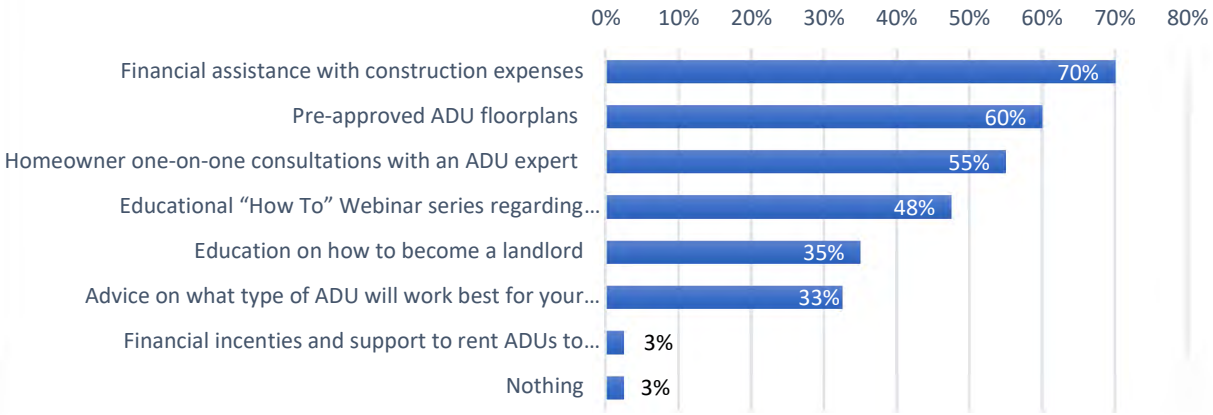
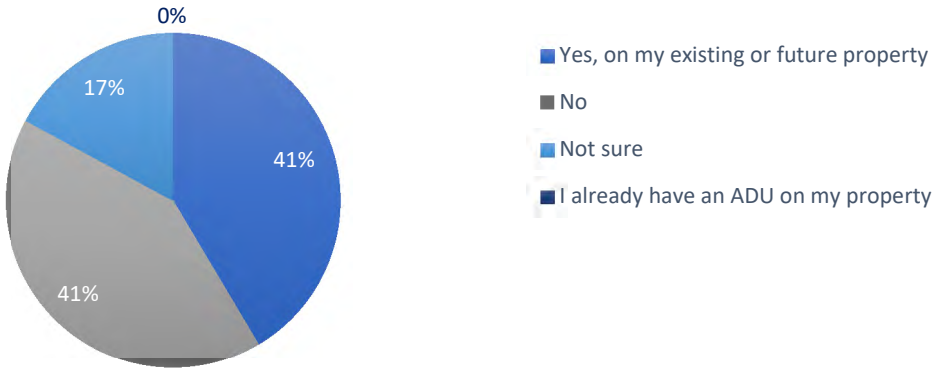


Figure 13 represents respondents' interest in developing an ADU on their property. An equal proportion of respondents (41 percent) indicated either interest in developing an ADU on their existing or future property or no interest at all. Additionally, 17 percent were unsure, and no respondents indicated already having an ADU. These results suggest a balanced level of interest and disinterest in ADU development, with a portion of respondents remaining undecided.

Figure 13: Would you be interested in developing an ADU (e.g. granny flat, in-law unit) on your property?



Fair Housing Issues

Figure 14 identifies the most urgent housing issues in Patterson based on respondents' rankings. Affordability of housing emerged as the top concern, ranked by 54 percent of respondents, followed by availability of housing (39 percent) and fair housing or housing discrimination (37 percent). Homelessness was also a significant concern at 32 percent. Other issues, such as overcrowding (27 percent) and housing quality (24 percent), were rated lower in urgency, while 29 percent of respondents indicated that there are no urgent housing issues. These results highlight affordability and availability as the primary housing challenges in Patterson.

Figure 14: What do you believe are the most urgent housing issues in Patterson? (Rank the issues below with 1 being most urgent)

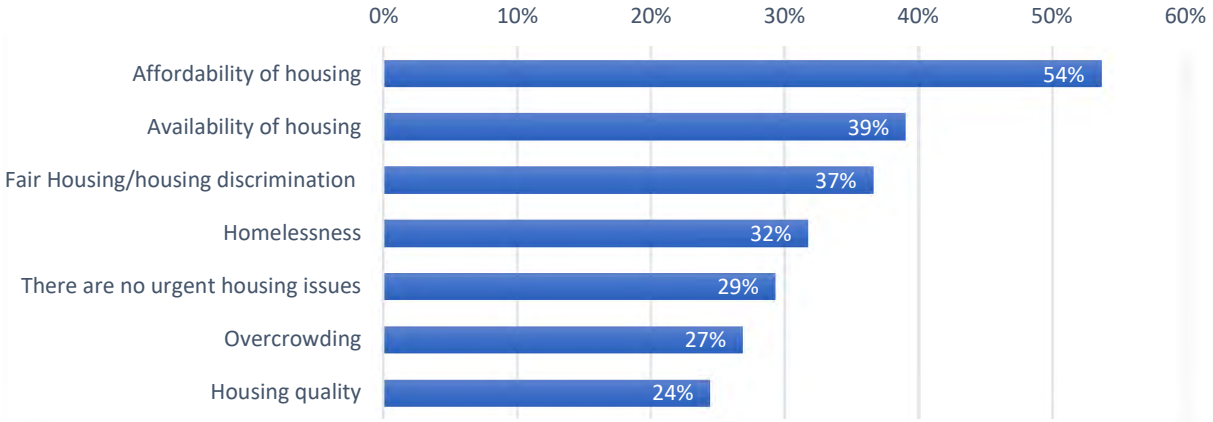


Figure 15 highlights housing quality issues experienced by respondents. The most common issues reported were a lack of access to adequate plumbing and kitchen facilities, each indicated by 22 percent of respondents, followed by poor indoor air quality (17 percent) and household overcrowding (15 percent). Less applicable issues among respondents included homelessness, lack of transitional housing, and houses being too close together (each at 2 percent). These findings indicate that basic infrastructure and indoor air quality are the primary housing quality concerns for respondents, as well as a need for local services for unhoused residents.

Figure 15: Which of the following housing quality issues, if any, do you feel apply to your current living situation? Select all that apply.



Figure 16 identifies the fair housing services most needed in the community according to respondents. Rent stabilization was the top priority, selected by 66 percent of respondents, followed by education and information on tenant rights (46 percent). Landlord/tenant counseling, fair housing education, and promoting equal access to housing choice were each chosen by 39 percent. Assistance with filing housing discrimination complaints was selected by 17 percent, while 5 percent of respondents indicated that none of the services were needed. These results emphasize the need for affordability and tenant-focused education and support services in the community.

Figure 16: Which fair housing services do you feel are most needed in our community? Select all that apply.

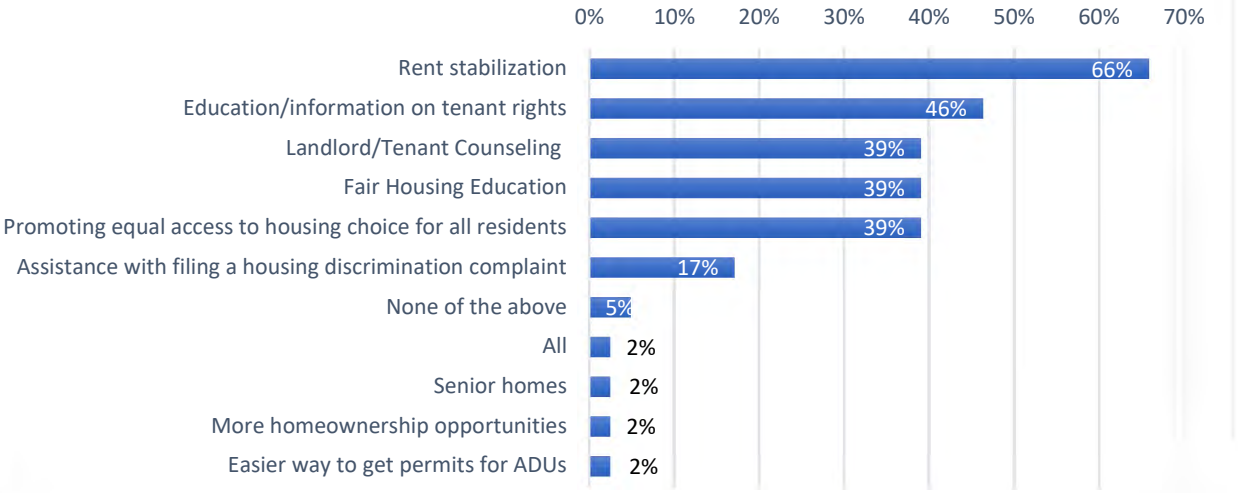


Figure 17 highlights the housing assistance services respondents identified as most needed in the community. Down payment assistance for lower-income first-time homebuyers was the top priority, selected by 83 percent of respondents. This was followed by home repair assistance for low-income homeowners (73 percent), rental assistance (54 percent), and financial assistance to build accessory dwelling units (51 percent). Education seminars for aspiring homeowners were selected by 41 percent. These results underscore a strong demand for financial support and resources aimed at increasing homeownership and maintaining affordable housing.

Figure 17: Which housing assistance services do you feel are most needed in our community? Select all that apply.

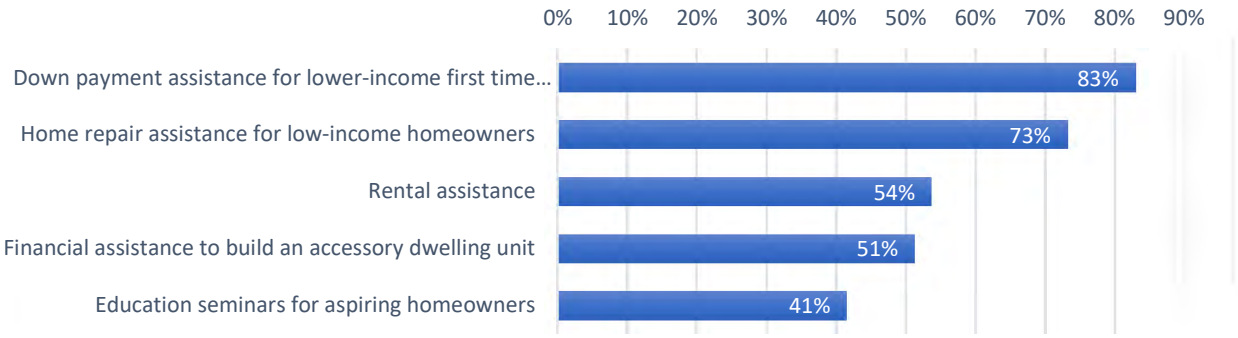
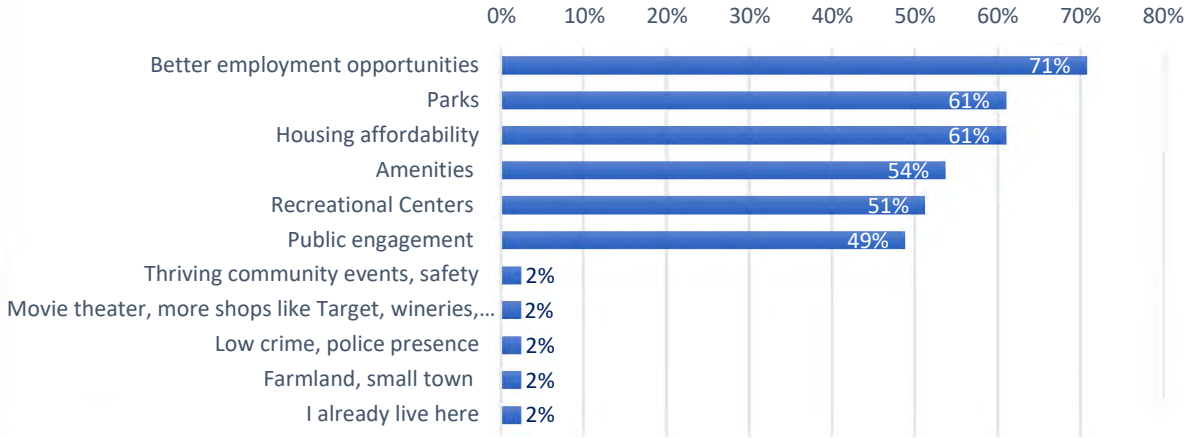


Figure 18 identifies factors that would attract individuals to live in Patterson. The top attractions include better employment opportunities (71 percent), parks (61 percent), and housing affordability (61 percent). Amenities (54 percent), recreational centers (51 percent), and public engagement (49 percent) were also significant factors. Less commonly mentioned were community events, safety, retail options, low crime, and small-town living, each indicated by 2 percent of respondents. These results indicate that economic opportunities and quality-of-life enhancements are key drivers for attracting residents to the city.

Figure 18: If you would like to live in Patterson, check the boxes that identify what would attract you to the City.



Open-Ended Questions

The survey featured three open-ended questions, providing respondents with the opportunity to share their thoughts and perspectives in response to the following topics outlined below. Full responses to the open-ended questions are included in Section A.5 at the end of this report for reference.

Respondents were asked, "What do you see contributing to homelessness in Stanislaus County?" Key themes identified included drug use, affordability, lack of shelters and transitional housing, insufficient regulation and enforcement, mental health issues, limited employment opportunities, inadequate supportive services, and a shortage of housing options for single-person or small households.

Respondents were also asked, "What do you expect from your city or county regarding homelessness/housing?" Key themes included educating residents on available resources and services, facilitating the production of affordable housing and job creation, and supporting local

organizations working to alleviate homelessness. Respondents emphasized the need for wraparound support services for individuals experiencing homelessness, assistance for first-time homebuyers, rental deposit support, and the development of homeless shelters while reducing regulatory barriers for shelter access. Additionally, respondents highlighted the importance of cleaning up parks and downtown areas to address encampments and loitering, as well as increasing law enforcement to ensure public safety. These responses underscore the community's expectation for a multi-faceted approach that combines education, housing development, supportive services, and enforcement to address homelessness effectively.

To end the survey, respondents were given the opportunity to note any other housing-related topics of concern. These responses are included in Section A.5 at the end of this report.

A.3 Discussion

The results of the Housing Needs Survey underscore a diverse set of housing-related challenges and priorities in the City of Patterson, as highlighted by the 41 respondents. Despite the limited sample size and inherent self-selection bias, the survey provides valuable qualitative insights into the housing needs, preferences, and barriers faced by the community.

Demographic and Economic Insights

The demographic data reveals an engaged respondent base, with notable representation from Hispanic/Latino residents and female heads of household. This demographic diversity, combined with the income distribution skewed towards lower to moderate-income brackets, emphasizes the economic challenges many residents face, particularly in accessing affordable housing options.

The age distribution of respondents, predominantly between 35 and 44 years, aligns with life stages where housing decisions are often more critical. Lower engagement from older residents highlights potential accessibility barriers or a perceived stability in housing among this demographic.

Housing Priorities and Barriers

Affordability emerges as the most significant barrier to housing, as identified by 63 percent of respondents. This aligns with the prioritization of lower-priced rental and ownership options, as well as homes affordable to first-time homebuyers. The lack of housing variety and supply further compounds these challenges, indicating a need for diverse housing solutions to meet varying community needs.

The high demand for financial and technical assistance with accessory dwelling units (ADUs) suggests a viable opportunity for the City to address housing shortages while promoting sustainable and flexible housing options. Similarly, down payment and home repair assistance for low-income households could significantly enhance homeownership rates and housing stability.

Chapter 3 of the Housing Element details programs designed to facilitate the development of diverse housing options, including accessory dwelling units (ADUs) and junior ADUs (JADUs), family-friendly housing with four or more bedrooms, senior housing, and single-room occupancy (SRO) units, as outlined in Programs 4.12, 4.5, 4.4, and 4.10, respectively. Additionally, Program 5.5 proposes enhancing the City's First-Time Homebuyer Down Payment Assistance program to better meet needs, while Program 4.12 includes initiatives to secure funding for low-interest loans to support ADU construction. Collectively, these efforts reflect the City's commitment to addressing the evolving housing needs of Patterson residents.

Community Preferences and Attractors

Survey respondents expressed a clear preference for single-story houses, condos, and other housing types that cater to smaller households and seniors. This demand aligns with demographic trends and suggests a potential shift in housing development strategies to meet these preferences. Moreover, the community's focus on better employment opportunities and quality-of-life enhancements, such as parks and recreational centers, highlights the interplay between housing and economic development in attracting and retaining residents.

The City is actively collaborating with several developers, including KB Homes, DR Horton, Self-Help Enterprises, LGI, Landsea Homes, and Lennar, to address Patterson's housing needs. Negotiations focus on constructing smaller, more affordable units and designing projects that accommodate multigenerational living, such as incorporating ADUs on single-family lots. These efforts are guided by community preferences and aim to deliver practical and affordable housing solutions.

The City is also committed to revitalizing both the western and eastern regions of Patterson through targeted capital improvement projects (Program 5.7, see Chapter 3 of the Housing Element). These initiatives aim to enhance the quality of life in underserved areas east of State Route 33 while preparing the area west of Baldwin Road for future residential development.

Addressing Homelessness and Housing Quality

Homelessness remains a critical concern, driven by factors such as drug use, mental health issues, and affordability. Respondents emphasized the need for comprehensive solutions, including affordable housing development, supportive services, and shelters. Addressing these challenges requires a coordinated approach involving education, resource provision, and enforcement.

Housing quality issues, including inadequate plumbing and poor indoor air quality, also highlight the need for targeted interventions to improve existing housing stock. Rent stabilization and tenant-focused education emerged as key priorities, reflecting a broader concern for housing equity and tenant protections.

Chapter 3 of the Housing Element outlines programs aimed at addressing homelessness through the development of emergency shelters, low-barrier navigation centers, transitional and supportive housing, and the provision of supportive services (Programs 4.6, 4.7, 4.9, and 4.8, respectively). Additionally, Program 5.8 includes initiatives to promote shared housing and market available options, while Program 5.9 focuses on expanding economic mobility in Patterson. Together, these programs aim to support individuals experiencing homelessness by offering pathways to secure housing and stable employment.

A.4 Conclusion and Recommendations

The findings of this survey provide a roadmap for addressing Patterson's housing challenges. Key recommendations include:

- Expanding affordable housing options for lower-income and first-time buyers;
- Promoting diverse housing types, including ADUs and smaller units;
- Enhancing community engagement, particularly among underrepresented demographics;
- Addressing homelessness through a combination of supportive services, shelters, and affordable housing development; and
- Improving housing quality through targeted repair programs and tenant protections.

By aligning housing policies with these priorities, the City of Patterson can create a more inclusive and sustainable housing landscape that meets the diverse needs of its residents.

A.5 Open-Ended Questions

What do you see contributing to homelessness in Stanislaus County?

Substance abuse; lack of law enforcement; lack of affordable homes to own in relation to job opportunities in the area.
Not have in patient drug therapy or a place to go for them to get clean and sober
Higher renting prices
alot of the persons just don't want to work and live humanly so if thats the case try to get em on the right path but if their option is not one that they want like to better themselves city needs to look for another way to keep em away from children.
Places to sleep
Our mayor/sheriff department are too lenient. Drug use is also a big factor
Drugs and financial crisis
People not wanting to work and cost of living.
As someone who came from a family that severely struggles with this: drugs.
Allowing them to take over and set up camps everywhere especially in downtown and the parks and railroad tracks
Lack of resources and enforcement for homeless
Lack of shelters
Rent is way to high
Enabling the homeless to continue living on the streets
High home/living costs. Affordability. Mental health and drug issues. Jobs do not meet the pay necessary to thrive.
People don’t want the help
Open parks

Mental facilities
the lack of entry level jobs
Lack of affordable rental housing - rents are too high
Low wages, job market isn't great, drug/alcohol abuse
Nuestra comunidad contribulle a tener y ayudar ala personas sin cada
Drug and alcohol abuse/ mental illness
Drugs
Drug use and/or sufficient income/job availability
No places /programs to attend daily
Rent increases
People moving in forcing people out of their homes by driving up the property values in turn driving up property taxes in turn forcing people who barely scraping by as is not being able to afford that in turn losing their homes. Also drug use and mental instability.
Drugs
Choices made
Not enough options for single person living
Lack of affordable housing, employment opportunities, financial assistance, transitional housing and supportive services.
Not enough options for single person living
Nothing
Not too sure some because this has always been their home town
Loss of employment, medical issues, addiction.
Loss of employment, medical issues, addiction.

drugs, the homeless person would rather do drugs than seek help and follow rules. Lack of facilities that can handle a homeless person all hours of the day and night therefore they are on the street during the day and go into a shelter at night. If they could be in a place for day and night services could come to them.
How expensive and the requirements of owning/renting a home
Drugs
Drugs, mental illness

What do you expect from your city or county regarding homelessness/housing?

Provide shelter, but prosecute for drug and criminal activity.
Crack down on them sleeping and dwelling on public or private property
Help address the issue by coming up with a solution
i expect them to deal with and get it done no matter wath
Getting them help /resources
If they are drug users they need to remove them. Our children/family/downtown areas are not safe with so many homeless/drug users. We should be proud of downtown Patterson. It needs to be revamped and have a lot more too offer.
They need to clean up or get out
Offer them resources. Unfortunately some people choose to be homeless
Not to increase taxes, again, to pay for any additional services. Patterson has more taxes than most other cities already.
More homes being built and more resources for seniors
Use law enforcement to take care of this problem
Invest in not just cleaning up the streets but giving options for those homes
I want them to help us get in to a place
Do not allow homeless to live within our city. It's sad that we have them all over our downtown and parks.
Our city has allowed Cambridge Academies to run Naomi's taking out tax money and offering little care to the community. They left Patterson when transparency was requested, taking furniture donated by our community members. Our city has done nothing to help obtain another program for the men's shelter. Paying the mortgage is one step, when will you do more?
Available housing for people when they are ready to get help.. less rules with the current housing offered

Continue cleaning up of common known areas
Mental awareness
to treat them with respect at the bare least
To address the issue so children are no longer living in their cars or bundled up in homes..
I expect the city to not let homelessness get out of control. programs for people experiencing homelessness to find work.
Espero que puedan crear un lugar para las personas sin casa ya que hay personas que son muy groseras a las mujeres que caminan con sus niños y uno nose siente seguro
I think they are doing all that they can
Kick them out. Have our parks free of tents/loitering.
Some sort of shelter/rehabilitation/education center or program that helps them work their way to get back on their feet. They must follow strict rules to qualify and stay in the program.
A solution!
Provide housing and jobs
I dont expect anything as its only getting worse and no one seems to care about fixing it.
More enforcement of law
Nothing
More options
Alternative living spaces for unhoused, such as tent and car camping space w/trash, bathroom and safe cooking facilities and electricity for phone charging, transitional shelters, creative employment opportunities such as internships and gig work for homeless.
More options
Help with rental deposits, first time home buyes

Help then find places to stay
To provide information regarding available state, county & city assistance to 1) alleviate homelessness and 2) provide information and resources to persons seeking housing assistance; take an active role in supporting local private organizations engaged in alleviating homelessness.
To provide information regarding available state, county & city assistance to 1) alleviate homelessness and 2) provide information and resources to persons seeking housing assistance; take an active role in supporting local private organizations engaged in alleviating homelessness.
Develop laws so they can not hang around public places and beg for money. Make laws so being homeless is not an alternative. Make laws and provide funding, like foster care, for adults that are homeless.
Help with first time home buyers
House/ rehabilitation
To not allow other cities to send their homeless citizens to Patterson. Help with the willing homeless citizens find treatment.

Are there any additional topics or concerns related to housing needs or resources in the City of Patterson that you would like to share or learn more about?

No
no
when living here in patterson for the last 17 years so much change has there been but thats where the city needs to step up and provide for the community price gauging on gas and food, community events for all(mexico independence celebration in downtown) and any other that is large and brings everyone like the apricot fiesta.
The parks and rec department also need to get it together. It's unbelievable that the soccer league all have the same uniforms. Not only that but they can't even buy the correct size. Why even ask when enrolling for a sport. Clean up the downtown area! It would be nice to be able to take our children to the park there, have a nice dinner. Not with all those homelessness/drug users there. We need to attract people to our downtown. Please go and look at Livermore, Tracy, Turlock, alameda.
Not sure
The increased pushing for additional dwellings in the backs of houses has us concerned about the cities future and safety. A lot of decisions being made has us reconsidering if we should continue to raise a family here or leave.
Need more stores, businesses, restaurants, and activities for KIDD
When will the senior housing area be completed across from the skate park/true value?
Your guys are doing an amazing job rehabbing this town… thank you!!!
what is taking so long with the road adjustment between Olive Ave and Sycamore Ave.
Make sure this survey is done in Spanish and in person to get an accurate account of this groups concerns as they relate to housing
Plant trees that don't shed berries
Don't become the next tracy. Stop building. Its only causes more problems for the city and the people who have lived there for generations. You're turing this town into something

unrecognizable and it's a shame. All you care about is the money you all bring in and don't care about the people that live there or have lived there that want to return to what they once knew.
no
Benefits for the disabled
Benefits for the disabled
"I am interested in the "Universal Design Ordinance" relative to seniors and persons with disabilities. I would like to attend workshops/meetings/discussions on the design of proposed units and, if appropriate, offer suggestions on amenities.
I am also interested in ADU's and how Patterson can encourage homeowners to build or place units on their properties, focusing on incentives to encourage homeowners to take the step and add an ADU on their property. "
"I am interested in the "Universal Design Ordinance" relative to seniors and persons with disabilities. I would like to attend workshops/meetings/discussions on the design of proposed units and, if appropriate, offer suggestions on amenities.
I am also interested in ADU's and how Patterson can encourage homeowners to build or place units on their properties, focusing on incentives to encourage homeowners to take the step and add an ADU on their property. "
No

Housing Element Site Inventory Table

B

APPENDIX

Map ID	APN	Project Name	Existing GP	Proposed GP	Existing Zoning	Proposed Zoning	Acres	Existing Min Density	Existing Max Density	Proposed Min Density	Proposed Max Density	Max Units	Utilized Density	Realistic Capacity (% of Max Density)	VL	L	M	AM	Unit Total Check
Zacharias Master Plan																			
1a			MDR		MR		11.1	5.1	12.0	5.1	12.0	133.2	6.0	50%			10	57	67
			MDR		MR		15.4	5.1	12.0	5.1	12.0	184.8	6.0	50%			12	80	92
			MDR		MR		15.7	5.1	12.0	5.1	12.0	188.4	6.0	50%			10	84	94
		Keystone Ranch	MDR		MR		5.1	5.1	12.0	5.1	12.0	61.2	7.4	62%			10	28	38
			MDR		MR		12.5	5.1	12.0	5.1	12.0	150	7.4	62%			10	83	93
			MDR		MR		16.1	5.1	12.0	5.1	12.0	193.2	7.4	62%			12	107	119
			HDR		HR		12.6	12.1	25	12.1	25.0	315	17.1	68%	17	26		173	216
														Subtotal	**17**	**26**	**64**	**612**	**719**
1b			MDR		MR		13.0	5.1	12.0	5.1	12.0	156	6.5	54%			10	74	84
			MDR		MR		13.9	5.1	12.0	5.1	12.0	166.8	6.5	54%			10	80	90
			MDR		MR		13.6	5.1	12.0	5.1	12.0	163.2	6.5	54%			10	78	88
			MDR		MR		14.8	5.1	12.0	5.1	12.0	177.6	6.5	54%			10	86	96
			MDR		MR		8.8	5.1	12.0	5.1	12.0	105.6	6.5	54%				57	57
			MDR		MR		15.6	5.1	12.0	5.1	12.0	187.2	6.5	54%			10	91	101
			MDR		MR		16.7	5.1	12.0	5.1	12.0	200.4	6.5	54%			10	98	108
			MDR		MR		11.4	5.1	12.0	5.1	12.0	136.8	6.5	53%				73	73
			MDR		MR		13.1	5.1	12.0	5.1	12.0	157.2	6.5	54%			10	75	85
			MDR		MR		19.4	5.1	12.0	5.1	12.0	232.8	6.5	54%			15	110	125
			MDR		MR		19.8	5.1	12.0	5.1	12.0	237.6	6.5	54%			15	113	128
			MDR		MR		15.3	5.1	12.0	5.1	12.0	183.6	6.5	54%			10	89	99
			MDR		MR		13.2	5.1	12.0	5.1	12.0	158.4	6.5	54%			10	75	85
			MDR		MR		12.6	5.1	12.0	5.1	12.0	151.2	6.5	54%			10	71	81
			MDR		MR		10.0	5.1	12.0	5.1	12.0	120	6.5	53%				64	64
		Lakeside Hills	MDR		MR		11.6	5.1	12.0	5.1	12.0	139.2	6.5	54%				75	75
			MDR		MR		6.3	5.1	12.0	5.1	12.0	75.6	6.5	53%				40	40
			MDR		MR		10.3	5.1	12.0	5.1	12.0	123.6	6.5	53%				66	66
			MDR		MR		14.7	5.1	12.0	5.1	12.0	176.4	6.5	54%			10	85	95
			MDR		MR		12.2	5.1	12.0	5.1	12.0	146.4	6.5	54%				79	79
			MDR		MR		13.7	5.1	12.0	5.1	12.0	164.4	6.5	54%			10	78	88
			MDR		MR		16.6	5.1	12.0	5.1	12.0	199.2	6.5	54%			10	97	107
			HDR		HR		13.0	12.1	25.0	12.1	25.0	325	18.0	71%	150	62	20		232
			HDR		HR		5.0	12.1	25.0	12.1	25.0	125	18.0	72%	70	20			90
			Mixed-Use		MU		2.7	12.1	25.0	12.1	25.0	67.5	10.5	39%	15	11			26
			Mixed-Use		MU		2.8	12.1	25.0	12.1	25.0	70	10.5	39%	17	10			27
			Mixed-Use		MU		3.1	12.1	25.0	12.1	25.0	77.5	10.5	40%	21	10			31
			Mixed-Use		MU		3.5	12.1	25.0	12.1	25.0	87.5	10.5	40%	10	10	15		35
			Mixed-Use		MU		6.4	12.1	25.0	12.1	25.0	160	10.5	41%	21	12	33		66
			Mixed-Use		MU		4.2	12.1	25.0	12.1	25.0	105	10.5	41%	10	21	12		43
			Mixed-Use		MU		5.5	12.1	25.0	12.1	25.0	137.5	10.5	42%	25	12	20		57
														Subtotal	**339**	**168**	**260**	**1,754**	**2,521**
														Total	**356**	**194**	**324**	**2,366**	**3,240**
														Lakeside Hills ADUs 15%	79	79	79	26	263
							431.3							**Zacharias MP Grand Total**	**435**	**273**	**403**	**2,392**	**3,503**
Baldwin Master Plan																			0
2			MDR		MR		60.9	5.1	12.0	5.1	12.0	730.8	5.1	42%			91	214	305
														Subtotal	**0**	**0**	**91**	**214**	**305**
														Baldwin Ranch ADUs 15%	10	10	10	2	32
														Baldwin Ranch MP Total	**10**	**10**	**101**	**216**	**337**
High Density																			
3	021-040-055	Las Palmas Place (Sr Housing)	HDR		HR		0.80	12.1	20.0	12.1	20.0	16	20.0	100%	16				16
4	047-024-024		HDR		HR		2.8	12.1	20.0	20.1	35.0	98	28.5	81%	43	36			79
5	047-034-035		HDR		HR		2.13	12.1	20.0	20.1	35.0	75	28.5	81%	60				60
Rezone Sites																			
6	048-042-001		General Commercial	HDR	GC	HR	5.5	n/a	n/a	20.1	35.0	193	28.5	81%	79	77			156
7	048-042-008		General Commercial	HDR	GC	HR	3.97	n/a	n/a	20.1	35.0	139	28.5	81%	58	55			113
8	048-043-002		LDR	HDR	LR	HR	2.08	1.1	5.0	20.1	35.0	73	28.5	81%	29	30			59
9	048-043-015		General Commercial	HDR	GC	HR	2.55	n/a	n/a	20.1	35.0	89	28.5	81%	36	36			72
10	048-048-007		General Commercial	HDR	GC	HR	10.00	n/a	n/a	20.1	35.0	350	28.5	81%	155	128			283
														Subtotal	**476**	**362**	**-**	**-**	**838**
Downtown Core																			
11	047-031-062		DC		DC		9.01	12.1	20.0	20.0	35.0	315	28.5	81%	128	128			256
														Subtotal	**128**	**128**	**-**	**-**	**256**
Mixed-Use																			
Rezone Sites																			
12	021-028-007		Highway Service Commercial	MU	HSC	MU	3.41	n/a	n/a	20.1	35.0	119	20.1	57%	24	24	20		68
13	021-028-008		Highway Service Commercial	MU	HSC	MU	2.06	n/a	n/a	20.1	35.0	72	20.1	57%	15	14	12		41
14	021-098-003		General Commercial	MU	GC	MU	8.53	n/a	n/a	20.1	35.0	299	20.1	57%	60	60	51		171

														Subtotal	99	98	83	-	280
Pipeline																			
15	047-059-005	VOP Lot 14	MDR		MR		5.73	5.1	12.0	5.1	12.0	69	17.0	143%			24	74	98
	047-025-069																		
16	047-025-019	Sycamore Ranch II	LDR		LR		46.23	1.1	5.0	1.1	5.0	231	5.34	105%			72	171	243
	047-025-036																		
														Subtotal	**0**	**0**	**96**	**245**	**341**

RHNA	**1,046**	**724**	**593**	**1,353**	**3,716**
5th Cycle Unaccommodated Need	**98**	**98**	**-**	**-**	196
RHNA + Unaccommodated Need	**1,144**	**822**	**593**	**1,353**	**3,912**
Pipeline	**-**	**-**	**96**	**245**	**341**
Adjusted Net RHNA	**1,144**	**822**	**497**	**1,108**	**3,571**
Zacharias MP Area	**356**	**194**	**324**	**2,366**	**3,240**
Lakeside Hills 15% ADUs	**79**	**79**	**79**	**26**	**263**
Baldwin Ranch MP Area	**-**	**-**	**91**	**214**	**305**
Baldwin Ranch 15% ADUs	**10**	**10**	**10**	**2**	**32**
Vacant/Underutilized Sites	**703**	**588**	**83**	**-**	**1,374**
Projected ADUs (not including MP areas)	**15**	**15**	**15**	**5**	**50**
Existing Units	**-**	**-**	**-**	**-**	**-**
Total Net Capacity	**1,163**	**886**	**602**	**2,613**	**5,264**
Net Surplus	**19**	**64**	**105**	**1,505**	**1,693**
Percent	**102%**	**108%**	**121%**	**236%**	**147%**

	VL	L	M	AM	Total
Total Units Less ADUs & Pipeline	1,059	782	498	2,580	**4,919**

City of Patterson 2023-2031 Housing Element Update
Air Quality & Greenhouse Gas Assessment (2025)
(Illingworth & Rodkin, Inc.)

C

APPENDIX

CITY OF PATTERSON 2023-2031 HOUSING ELEMENT UPDATE AIR QUALITY & GREENHOUSE GAS ASSESSMENT

Patterson, California

October 20, 2025
Revised October 23, 2025

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Introduction

The purpose of this report is to address air quality and greenhouse gas (GHG) emissions associated with the City of Patterson 6th Cycle Housing Element 2023-2031 Update (HEU Plan). This update accommodates increased residential development, including new residences in areas currently zoned for non-residential development. Air quality impacts and GHG emissions from the HEU Plan would be associated with changes in land uses that result in changes in emissions and changes in exposure of sensitive receptors to air pollution. This report includes a summary of applicable air quality and GHG regulations and analyzes potential air quality impacts and GHG emissions associated with the proposed Housing Element Update.

Project Description

The proposed HEU Plan would update the City's Housing Element to address the Regional Housing Needs Assessment (RHNA). For the upcoming planning period, the State has determined that the City must plan for an additional 3,716 new housing units. As part of the HEU Plan, the City is required to identify sufficient sites to accommodate its RHNA, as determined by the California Department of Housing and Community Development (HCD) and the Stanislaus Council of Governments (StanCOG). The HCD requires local jurisdictions identify enough housing sites inventory to not only cover the RHNA, but also provide an additional buffer capacity above the RHNA. The buffer capacity is required to accommodate realistic production rates of affordable housing units; plus having the buffer can allow for instances when a smaller residential project may have to be considered for a given property. The recommendation from HCD is to adopt a housing site inventory with a buffer of 15 to 30 percent over the allocated RHNA.

The City's RHNA allocation for the 2023-2031 planning period is 3,716 housing units with an approximately 24-percent buffer of an additional 1,203 units. The City prepared an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment. The HEU Plan is comprised of 16 candidate housing for future housing development to meet the City's 2023-2031 RHNA allocation and the required 15 percent buffer. Two of these sites are considered pipeline projects that have completed environmental review and are awaiting construction. Additionally, the HEU Plan allocates accessory dwelling units toward meeting the RHNA; however, accessory dwelling units are not required by state law to be evaluated in CEQA. Accordingly, pipeline projects and accessory dwelling units are not evaluated in this study. Future housing development could occur on these candidate housing sites/parcels, if ultimately included within the HEU Plan, as local conditions dictate with timing at the discretion of each individual property owner.

The candidate housing sites could yield up to 5,264 housing units. Recognizing that not all candidate housing sites will ultimately be included in the HEU Plan, this assessment evaluates the air quality impacts for development of 4,919 housing units (RHNA allocation plus 24 percent).

Environmental Setting

The HEU plan area is in Stanislaus County in the northern portion of the San Joaquin Valley Air Basin (SJVAB). The California Air Resources Board (CARB) defines the boundaries of the basin

by the San Joaquin Valley within the Sierra Nevada Mountains to the east, the Coast Ranges in the west, and the Tehachapi mountains in the south. The valley opens to the ocean at the north, at the Carquinez Strait, where the San Joaquin-Sacramento Delta empties into San Francisco Bay.

The climate of the HEU Plan area is characterized by hot dry summers and cool, mild winters. Strong southwesterly winds are predominant as a result of being near the delta in all seasons, but more so in the summer and spring months. Winter and fall are characterized by mostly light and variable wind flow. The San Joaquin Valley Air Basin meets all ambient air quality standards except for ground-level ozone, respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$).

The pollution potential of the San Joaquin Valley is very high. The San Joaquin Valley has one of the most severe air pollution problems in the State. Surrounding elevated terrain in conjunction with temperature inversions frequently restrict lateral and vertical dilution of pollutants. Abundant sunshine and warm temperatures in late spring, summer, and early fall are ideal conditions for the formation of ozone, where the Valley frequently experiences unhealthy air pollution days. Low wind speeds, combined with low inversion layers in the winter, create a climate conducive to high respirable particulate matter (PM_{10}) concentrations.

Air pollutants are governed by multiple federal and state standards to regulate and mitigate health impacts. At the federal level, there are six criteria pollutants for which National Ambient Air Quality Standards (NAAQS) have been established: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), suspended particulate *matter* (PM: $PM_{2.5}$ and PM_{10}), and sulfur dioxide (SO_2). California sets standards, similar to the NAAQS as California Ambient Air Quality Standards (CAAQS). Health effects of the primary criteria pollutants (i.e., the NAAQS) and their potential sources are described below and summarized in Table 1. Note that California includes pollutants or contaminants that are specific to certain industries and not associated with this HEU Plan. These include hydrogen sulfide and vinyl chloride.

Ozone

Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_X). The main sources of ROG and NO_X, often referred to as O_3 precursors, are combustion processes (including combustion in motor vehicle engines) and the evaporation of solvents, paints, and fuels. In the Bay Area, automobiles are the single largest source of O_3 precursors. O_3 is referred to as a regional air pollutant because its precursors are transported and diffused by wind concurrently with O_3 production through the photochemical reaction process. O_3 causes eye irritation, airway constriction, shortness of breath, and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide

Carbon monoxide is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles. While CO transport is limited, it disperses with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations near congested

roadways or intersections may reach unhealthful levels that adversely affect local sensitive receptors (e.g., residents, schoolchildren, the elderly, hospital patients, etc.). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service (LOS) or with extremely high traffic volumes. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, fatigue, impair central nervous system function, and induce angina (chest pain) in persons with serious heart disease. Very high levels of CO can be fatal.

Nitrogen Dioxide

Nitrogen Dioxide is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to O_3 formation, NO_2 also contribute to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition. NO_2 may be visible as a coloring component on high pollution days, especially in conjunction with high O_3 levels. NO_2 decreases lung function and may reduce resistance to infection. On January 22, 2010, the U.S. Environmental Protection Agency (EPA) strengthened the health-based NAAQS for NO_2.

Sulfur Dioxide

Sulfur dioxide is a colorless, irritating gas formed primarily from incomplete combustion of fuels containing sulfur. Industrial facilities also contribute to gaseous SO_2 levels in the region. SO_2 irritates the respiratory tract, can injure lung tissue when combined with fine particulate matter, and reduces visibility and the level of sunlight.

Particulate Matter

Particulate matter is the term used for a mixture of solid particles and liquid droplets found in the air. Coarse particles are those that are larger than 2.5 microns but smaller than 10 microns (PM_{10}). $PM_{2.5}$ refers to fine suspended particulate matter with an aerodynamic diameter of 2.5 microns or less that is not readily filtered out by the lungs. Nitrates, sulfates, dust, and combustion particulates are major components of PM_{10} and $PM_{2.5}$. These small particles can be directly emitted into the atmosphere as by-products of fuel combustion, through abrasion, such as tire or brake lining wear, or through fugitive dust (wind or mechanical erosion of soil). They can also be formed in the atmosphere through chemical reactions. Particulates may transport carcinogens and other toxic compounds that adhere to the particle surfaces and can enter the human body through the lungs.

Lead

Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufactures.

Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, the U.S. EPA established national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The EPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of the EPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.

Toxic Air Contaminants (TACs)

group of pollutants of concern. TACs are injurious in small quantities and are regulated by the EPA and the California Air Resources Board (CARB). Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. The identification, regulation, and monitoring of TACs is relatively recent compared to that for criteria pollutants.

High-volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (distribution centers, truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, and high-volume transit centers. Health risks from TACs are a function of both concentration and duration of exposure.

Table 1. Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	• Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. • Natural events, such as decomposition of organic matter.	• Reduced tolerance for exercise. • Impairment of mental function. • Impairment of fetal development. • Death at high levels of exposure. • Aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO_2)	• Motor vehicle exhaust. • High temperature stationary combustion. • Atmospheric reactions.	• Aggravation of respiratory illness. • Reduced visibility. • Reduced plant growth. • Formation of acid rain.
Ozone (O_3)	• Atmospheric reaction of organic gases with nitrogen oxides in sunlight.	• Aggravation of respiratory and cardiovascular diseases. • Irritation of eyes. • Impairment of cardiopulmonary function. • Plant leaf injury.
Lead (Pb)	• Contaminated soil.	• Impairment of blood functions and nerve construction. • Behavioral and hearing problems in children.
Suspended Particulate Matter ($PM_{2.5}$ and PM_{10})	• Stationary combustion of solid fuels. • Construction activities. • Industrial processes. • Atmospheric chemical reactions.	• Reduced lung function. • Aggravation of the effects of gaseous pollutants. • Aggravation of respiratory and cardiorespiratory diseases. • Increased cough and chest discomfort. • Soiling. • Reduced visibility.
Sulfur Dioxide (SO_2)	• Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes.	• Aggravation of respiratory diseases (asthma, emphysema). • Reduced lung function. • Irritation of eyes. • Reduced visibility. • Plant injury. • Deterioration of metals, textiles, leather, finishes, coatings, etc.
Toxic Air Contaminants	• Cars and trucks, especially diesels. • Industrial sources such as chrome platers. • Neighborhood businesses such as dry cleaners and service stations. • Building materials and product.	• Cancer. • Chronic eye, lung, or skin irritation. • Neurological and reproductive disorders.

Source: CARB Fact Sheet: Common Air Pollutants, see: https://ww2.arb.ca.gov/resources/common-air-pollutants accessed July 14, 2025.

Local Climate and Air Quality

Air quality is a function of both local climate and local sources of air pollution. Air quality is the balance of the natural dispersal capacity of the atmosphere and emissions of air pollutants from human uses of the environment. Climate and topography are major influences on air quality.

Climate and Meteorology

The SJVAB is in a Mediterranean climate zone and is influenced by a subtropical high-pressure cell most of the year. Mediterranean climates are characterized by sparse rainfall, which occurs mainly in winter. Summers are hot and dry. Summertime maximum temperatures often exceed 100°F in the valley.

The subtropical high-pressure cell is strongest during spring, summer, and fall and produces subsiding air, which can result in temperature inversions in the valley. A temperature inversion can act like a lid, inhibiting vertical mixing of the air mass at the surface. Any emissions of pollutants can be trapped below the inversion. Most of the surrounding mountains are above the normal height of summer inversions (1,500 to 3,000 feet).

Winter-time high pressure events can often last many weeks, with surface temperatures often lowering into the 30°F. During these events, fog can be present and inversions are extremely strong. These wintertime inversions can inhibit vertical mixing of pollutants to a few hundred feet.

Attainment Status Designations

The CARB is required to designate areas of the state as attainment, nonattainment, or unclassified for all state standards. An “attainment” designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A “nonattainment” designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An “unclassified” designation signifies that data does not support either an attainment or nonattainment status. The California Clean Air Act (CCAA) divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

Table 2 shows the state and federal standards for criteria pollutants and provides a summary of the attainment status for the San Joaquin Valley Air Basin with respect to national and state ambient air quality standards.

Table 2. NAAQS, CAAQS, and San Joaquin Valley Air Basin Attainment Status

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Carbon Monoxide (CO)	8-Hour	9 ppm (10 mg/m^3)	Attainment /Unclassified	9 ppm (10 mg/m^3)	Attainment /Unclassified
	1-Hour	20 ppm (23 mg/m^3)	Attainment /Unclassified	35 ppm (40 mg/m^3)	Attainment /Unclassified
Nitrogen Dioxide (NO_2)	Annual Mean	0.030 ppm (57 mg/m^3)	Attainment	0.053 ppm (100 µg/m^3)	Attainment /Unclassified
	1-Hour	0.18 ppm (338 µg/m^3)	Attainment	0.100 ppm	Attainment /Unclassified
Ozone (O_3)	8-Hour	0.07 ppm (137 µg/m^3)	Nonattainment	0.07 ppm	Nonattainment/ Extreme
	1-Hour	0.09 ppm (180 µg/m^3)	Nonattainment/ Severe	Not Applicable	Revoked
Suspended Particulate Matter (PM_{10})	Annual Mean	20 µg/m^3	Nonattainment	Not Applicable	Attainment
	24-Hour	50 µg/m^3	Nonattainment	150 µg/m^3	Attainment
Suspended Particulate Matter ($PM_{2.5}$)	Annual Mean	12 µg/m^3	Nonattainment	12 µg/m^3	Nonattainment
	24-Hour	Not Applicable	None	35 µg/m^3	Nonattainment
Sulfur Dioxide (SO_2)	24-Hour	0.04 ppm (105 µg/m^3)	Attainment		Attainment/ Unclassified
	3-Hour	Not Applicable	Attainment	0.075 ppm (196 µg/m^3)	Attainment/ Unclassified
	1-Hour	0.25 ppm (655 µg/m^3)	Attainment	0.05 ppm	Attainment/ Unclassified
Lead (Pb) is not listed in the above table because it has been in attainment since the 1980s. ppm = parts per million, mg/m^3 = milligrams per cubic meter, µg/m^3 = micrograms per cubic meter					

Source: San Joaquin Valley Air Pollution Control District *Ambient Air Quality Standards & Attainment Status.* https://www.valleyair.org/air-quality-information/ambient-air-quality-standards-valley-attainmnet-status/ Accessed September 19, 2025.

Existing Air Pollutant Levels

The CARB monitors air pollution at various sites within California. The closest air monitoring station is located at 14th Street in Modesto, approximately 12 miles from the HEU area. Note that this site does not monitor CO, PM_{10}, or NO_2. The data shows that during the most recently available period of 2020 through 2024, the HEU area has exceeded the federal O_3 and $PM_{2.5}$ ambient air quality standards. Table 3 lists air quality trends in data collected for the 2020 through 2024 period and published by CARB, which is the most recent time-period available. O_3 standards, based on the 1- and 8-hour average concentrations were exceeded 0 to 3 days annually in Modesto. Measured 24-hour $PM_{2.5}$ concentrations are exceeded on 0 to 25 monitoring days in Modesto. Note that $PM_{2.5}$ levels were influenced by smoke from wildfires. Air pollutants that include CO, Pb, and SO_2 have been historically measured at low levels in the San Joaquin Valley, and are, therefore, not measured anymore.

Table 3. Measured Ambient Air Quality Concentrations from 2020 through 2024

Pollutant	Standard	2020	2021	2022	2023	2024
Ozone in Modesto						
Max 1-hr concentration		102 ppb	106 ppb	113 ppb	99 ppb	108 ppb
No. days exceeded: CAAQS	90 ppb	3	3	1	1	1
Max 8-hr concentration		83 ppb	89 ppb	86 ppb	84 ppb	80 ppb
No. days exceeded:						
CAAQS	70 ppb	13	10	4	12	12
NAAQS	70 ppb	13	11	5	14	13
$PM_{2.5}$ in Modesto						
Max 24-hr concentration		114.9 µg/m^3	66.8 µg/m^3	53.9 µg/m^3	43.2 µg/m^3	51.6 µg/m^3
No. days exceeded: NAAQS	35 µg/m^3	25	20	11	3	5
Annual Concentration		14.5 g/m^3	15.0 µg/m^3	13.3 µg/m^3	10.5 µg/m^3	9.0 µg/m^3
Exceeded?						
CAAQS	12 µg/m^3	Yes	Yes	Yes	No	No
NAAQS	9 µg/m^3	Yes	Yes	Yes	Yes	No
CO – No measurements made						
PM_{10} – No measurements made						
NO_2 – No measurements made						

Source: California Air Resource Board, 2025, Web: https://arb.ca.gov/adam/select8/sc8start.php

Sensitive Receptors

There are groups of people more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools. For cancer risk assessments, infants and small children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children.

Regulatory Framework

Pursuant to the Federal Clean Air Act (FCAA) of 1970, the EPA established the NAAQS. The NAAQS were established for major pollutants, termed "criteria" pollutants. Criteria pollutants are defined as those pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

Both the EPA and the CARB have established ambient air quality standards for common pollutants: CO, O_3, NO_2, SO_2, Pb, and PM. In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles. These standards are designed to protect the health and welfare of the public with a reasonable margin of safety. These ambient air quality standards are levels of contaminants which represent safe levels that avoid specific adverse health effects associated with each criteria pollutant.

Federal Air Quality Regulations

At the federal level, the EPA has been charged with implementing national air quality programs. EPA's air quality mandates are drawn primarily from the FCAA, which was enacted in 1963. The FCAA was amended in 1970, 1977, and 1990.

The FCAA required EPA to establish primary and secondary NAAQS and required each state to prepare an air quality control plan referred to as a State Implement Plan (SIP). Federal standards include both primary and secondary standards. Primary standards set limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.[1] The Federal Clean Air Act Amendments of 1990 (FCAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA has responsibility to review all state SIPs to determine conformity with the mandates of the FCAAA and determine if implementation will achieve air quality goals. If the EPA determines a SIP to be inadequate, a Federal Implementation Plan (FIP) may be prepared for the nonattainment area which imposes additional control measures. Failure to submit an approvable SIP or to implement the Plan within the mandated timeframe may result in the application of sanctions on transportation funding and stationary air pollution sources in the air basin.

The 1970 FCAA authorized the establishment of national health-based air quality standards and also set deadlines for their attainment. The FCAA Amendments of 1990 changed deadlines for attaining NAAQS as well as the remedial actions required of areas of the nation that exceed the standards. Under the FCAA, state and local agencies in areas that exceed the NAAQS are required to develop SIPs to show how they will achieve the NAAQS by specific dates. The FCAA requires that projects receiving federal funds demonstrate conformity to the approved SIP and local air quality attainment Plan for the region. Conformity with the SIP requirements would satisfy the FCAA requirements.

State Air Quality Regulations

The CARB is the agency responsible for the coordination and oversight of state and local air pollution control programs in California and for implementing the CCAA, adopted in 1988. The CCAA requires that all air districts in the state achieve and maintain the CAAQS by the earliest practical date. The CCAA specifies that districts should focus on reducing the emissions from transportation and air-wide emission sources and provides districts with the authority to regulate indirect sources.

CARB is also responsible for developing and implementing air pollution control plans to achieve and maintain the NAAQS. CARB is primarily responsible for statewide pollution sources and

[1] See: U.S. Environmental Protection Agency, Web: https://www.epa.gov/criteria-air-pollutants/naaqs-table, Accessed 13 August 2020

produces a major part of the SIP. Local air districts provide additional strategies for sources under their jurisdiction. CARB combines this data and submits the completed SIP to the EPA.

Other CARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control and air quality management districts), establishing CAAQS (which in many cases are more stringent than the NAAQS), determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, and off-road vehicles.

California Clean Air Act

In 1988, the CCAA established its own, more stringent ambient air quality standards, known as California Ambient Air Quality Standards (CAAQS). The CCAA requires that all air basins in the state endeavor to achieve and maintain CAAQS for CO, O_3, SO_2, and NO_2 by the earliest practical date. The CCAA establishes local air districts and provides them with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each nonattainment area in the State is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, for each nonattainment pollutant or its precursors. A Clean Air Plan is a SIP that shows how a district would reduce emissions to achieve air quality standards.

California Air Resources Board Handbook

In 1998, CARB identified particulate matter from diesel-fueled engines (i.e., DPM) as a toxic air contaminant. CARB has completed a risk management process that identified potential cancer risks for a range of activities using diesel-fueled engines.[2] CARB subsequently developed an Air Quality and Land Use Handbook[3] (Handbook) in 2005 that is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. The 2005 CARB Handbook recommends that planning agencies consider proximity to air pollution sources when considering new locations for "sensitive" land uses, such as residences, medical facilities, daycare centers, schools, and playgrounds.

Air pollution sources of concern include freeways, rail yards, ports, refineries, distribution centers, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the Handbook relative to the HEU Plan Area include taking steps to consider or avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day or rural roads with 50,000 vehicles/day.
- Within 300 feet of gasoline fueling stations (note that new fueling stations utilize enhanced vapor recovery systems that substantially reduce emissions).

[2] California Air Resources Board, 2000. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. October.
[3] California Air Resources Board, 2005. *Air Quality and Land Use Handbook: A Community Health Perspective.* April.

- Within 300 feet of dry-cleaning operations (note that dry cleaning with TACs is being phased out and was completely prohibited beginning in 2023).

Since the handbook was published, California has substantially reduced or eliminated some of the TAC emission sources, such that these buffer distances are likely not applicable. For example, particulate and diesel particulate matter (DPM) emissions from trucks have been greatly reduced through U.S. EPA engine standards that phased in after 2010. TACs are no longer used in dry cleaning. Gasoline stations and passenger vehicles have greatly improved vapor recovery systems that reduce TAC emissions associated with gasoline dispensing facilities.

Truck and Bus Regulation

CARB is actively enforcing heavy-duty diesel vehicle regulations that require fleets to replace or retrofit heavy-duty diesel vehicles, with full implementation of the program scheduled for January 1, 2023. Compliance with the program is generally considered vehicles equipped with a 2010 or newer engine model year. As of January 1, 2020, the DMV cannot register any vehicle that does not meet the requirements of the Truck and Bus Regulation.

Other CARB diesel programs affecting heavy-duty diesel vehicles include:

- Idling limits of no more than 5 minutes with special exceptions.
- Emission Control Labels must be affixed to engines of all commercial heavy-duty diesel vehicles, and must be legible as proof the engine, at minimum, meets U.S. federal emissions standards for the engine model year.
- The Periodic Smoke Inspection Program requires owners of California-based fleets of two or more diesel vehicles to perform annual smoke opacity tests and to keep records for at least two years for each vehicle.
- The Heavy-Duty Vehicle Inspection Program uses random roadside inspections to verify that diesel engines do not smoke excessively and are tamper-free.

Off-Road Vehicle and Equipment Regulations

CARB has also adopted and implemented regulations to reduce DPM and nitrogen oxides (NOx) emissions from in-use (existing) and new off-road heavy-duty diesel vehicles (e.g., loaders, tractors, bulldozers, backhoes, off-highway trucks, etc.). The regulations apply to diesel-powered off-road vehicles with engines 25 horsepower (hp) or greater. The regulations are intended to reduce particulate matter and NOx exhaust emissions by requiring owners to turn over their fleet (replace older equipment with newer equipment) or retrofit existing equipment in order to achieve specified fleet-averaged emission rates. Implementation of this regulation, in conjunction with stringent Federal off-road equipment engine emission limits for new vehicles, is expected to substantially reduce emissions of DPM and NOx.

Fleet owners must report the vehicle and engine information for all vehicles within their fleets operating in California. Fleet owners must also report owner information. Fleet owners should report using DOORS, which is CARB's online reporting tool. CARB issues a unique Equipment

Identification Number (EIN) that is assigned to each vehicle. The fleet owner must label their vehicles with the EIN.

Other CARB diesel programs affecting off-road vehicles and equipment include:

- Idling limits of no more than 5 minutes with special exceptions.
- Portable engines 50 hp or greater may require a permit or registration to legally operate. The Air District is responsible for taking enforcement action against individuals who own or operate portable equipment without a registration or permit.

Advanced Clean Trucks (ACT)

California's Advanced Clean Trucks (ACT) increases the percentage of medium and heavy-duty trucks sold as zero emission vehicles (ZEVs) beginning in 2024. By 2035, 40 to 75 percent of new trucks sold, depending on size, would have to meet ZEV requirements. In addition, large employers including retailers, manufacturers, brokers and others are required to report information about shipments and shuttle services with 50 or more trucks, are required to report about their existing fleet operations. California abandoned this rule in January 2025, after it was unsuccessful in obtaining a waiver from U.S. EPA in 2024.

Omnibus Regulation

The Omnibus regulation will require manufacturers of heavy-duty trucks to comply with more stringent emissions standards that will reduce heavy-duty NOx emissions by 90%, overhaul engine testing procedures, and further extend engine warranties. The measure is meant to help California meet federal air quality standards (i.e., NAAQS). California received U.S. EPA approval for this regulation in December 2024.

Advanced Clean Cars

CARB regulates emissions from on-road vehicles in a number of ways that including the setting emission standards, testing vehicles through the Smog Check Program (administered by the Bureau of Automotive Repair) and implementation of fleet retrofit or replacement schedules. The Advanced Clean Cars Program, adopted by CARB in 2012, was designed to bring together CARB's traditional passenger vehicle requirements to meet federal air quality standards and also support California's AB 32 goals to develop and implement programs to reduce GHG emissions back down to 1990 levels by 2020, a goal achieved in 2016 as a result of numerous emissions reduction programs.

This recent rule, *Advanced Clean Cars II (ACC II)* is phase two of the original rule. ACC II establishes a year-by-year process, starting in 2026, so all new cars and light trucks sold in California will be zero-emission vehicles by 2035, including plug-in hybrid electric vehicles. The regulation codifies the light-duty vehicle goals set out in Governor Newsom's Executive Order N-79-20. U.S. EPA approval was received in December 2024. Currently, 16 percent of new light-duty vehicles sold in California are zero emissions or plug-in hybrids. By 2030, 68 percent of new vehicles sold in California would be zero emissions and 100 percent by 2035.

San Joaquin Valley Air Pollution Control District

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is made up of eight counties in California's Central Valley: San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings Tulare, and the western portion of Kern. The primary role of the SJVAPCD is to develop rules, regulations, plans, and pollution control strategies for the San Joaquin Valley to control air pollution in the region. The district's rules and regulations control air pollution from a wide range of sources, not just large industrial sources such as factories and power plants. In March 2007, an Indirect Source Review (ISR) rule was adopted that controls air pollution from new land developments. The adopted rules and regulations that apply to the proposed HEU Plan are described below.

SJVAPCD Indirect Source Review Rule[4]

SJVAPCD Rule 9510, Indirect Source Review (ISR or Rule 9510) was adopted to reduce NO_X and PM_{10} emissions from new land use development projects. The rule, which became effective March 1, 2006, is the result of state requirements outlined in the region's SIPs. Rule 9510 was amended in December 2017 (and became effective March 21, 2018) to ensure that all large development projects are subject to the rule. The SJVAPCD's SIP commitments are contained in the 2004 Extreme Ozone Attainment Demonstration Plan and the 2003 PM_{10} Plan. These plans identified the need to reduce PM_{10} and NO_X to attain and maintain the ambient air-pollution standards on schedule.

New projects that would generate substantial air pollutant emissions are subject to this rule. The rule requires projects to mitigate both construction and operational period emissions by applying the SJVAPCD-approved mitigation measures and paying fees to support programs that reduce emissions. The rule requires mitigated exhaust emissions during construction based on the following levels:

- 20 percent reduction from unmitigated baseline in total NO_X exhaust emissions
- 45 percent reduction from unmitigated baseline in total PM_{10} exhaust emissions

For operational emissions, Rule 9510 requires the following reductions:

- 33.3 percent of the total operational NO_X emissions from unmitigated baseline
- 50 percent of the total operational PM_{10} exhaust emissions from unmitigated baseline

Fees apply to the unmitigated portion of the emissions and are based on estimated costs to reduce the emissions from other sources plus estimated costs to cover administration of the program. In accordance with ISR, the project applicant will apply for approval of an Air Impact Assessment (AIA) to the SJVAPCD.

Regulation VIII – Fugitive PM_{10}

[4] Rule 9510 Indirect Source Review (ISR) (Adopted December 15, 2005; Amended December 21, 2017, but not in effect until March 21, 2018). SJVAPCD. http://www.valleyair.org/rules/currntrules/r9510-a.pdf

SJVAPCD controls fugitive PM_{10} through Regulation VIII (Fugitive PM_{10} Prohibitions). The purpose of this regulation is to reduce ambient concentrations of PM_{10} by requiring actions to prevent, reduce or mitigate anthropogenic (human caused) fugitive dust emissions. This applies to activities such as construction, bulk materials, open areas, paved and unpaved roads, material transport, and agricultural areas. Sources regulated are required to provide dust control plans that meet the regulation requirements. Fees are collected by SJVAPCD to cover costs for reviewing plans and conducting field inspections.

Other SJVAPCD Rules

Other SJVAPCD Rules and Regulations that may be applicable to the HEU Plan include, but are not limited to:

- Rule 4101 (Visible Emissions): The purpose of this rule is to prohibit the emissions of visible air contaminants to the atmosphere. The provisions of this rule apply to any source operation which emits or may emit air contaminants.
- Rule 4102 (Nuisance): The purpose of this rule is to protect the health and safety of the public and applies to any source operation that emits or may emit air contaminants or other materials.
- Rule 4601 (Architectural Coatings): The purpose of this rule is to limit Volatile Organic Compounds (VOC) emissions from architectural coatings. Emissions are reduced by limits on VOC content and providing requirements on coatings storage, cleanup, and labeling.
- Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations): The purpose of this rule is to limit VOC emissions from asphalt paving and maintenance operations. Paving operations will be subject to Rule 4641.

The Air District is anticipated to provide a determination of applicable rules/regulations to the HEU Plan when specific building, grading, etc. plans are provided to the Air District prior to initiation of construction- and operation-related activities that fall within the purview of the Air District's regulatory authority.

City of Patterson

City of Patterson General Plan

The City of Patterson General Plan was adopted on November 30, 2010[5]. The goals, policies, and programs relevant to air quality and greenhouse gases are contained in the Circulation and Air Resources and Climate Change Elements:

Circulation Element

Goal T-4: To consider air quality and noise impacts along with traffic flow efficiency when making decisions about improvements to existing roadways or the construction of new roadways.

[5] Patterson, California General Plan/City Maps, See https://www.pattersonca.gov/145/General-PlanCity-Maps, accessed September 18, 2025.

Policy T-4.1: Protection of neighborhoods from traffic impacts. To the extent feasible, the City shall provide for separation of residential and other noise-sensitive land uses from major roadways to reduce noise and air pollution impacts from traffic.

Air Resources and Climate Change Element

Goal AR-1: To foster effective communication, cooperation, and coordination in developing and operating community and regional air quality programs.

Policy AR-1.1: Source regulation. The City shall review development projects using criteria established by the San Joaquin Valley Unified Air Pollution Control District in order to minimize future increases in vehicle travel and to assist in implementing appropriate indirect source regulations adopted by the Air Pollution Control District.

Policy AR-1.2: APCD cooperation. The City shall work with the San Joaquin Valley Unified Air Pollution Control District to ensure the earliest practicable attainment and subsequent maintenance of federal and state ambient air quality standards.

Policy AR-1.3: CEQA. The City shall use the CEQA process to identify and avoid or mitigate potentially significant air quality impacts of new development. The CEQA process shall be used to ensure early consultation with the San Joaquin Valley Unified Air Pollution Control District concerning air quality issues associated with specific development proposals.

Policy AR-1.4: Air quality mitigation. The City shall ensure all air quality mitigation measures are feasible, implementable, and cost effective.

Policy AR-1.6: Innovative strategies. The City shall encourage innovative mitigation measures to reduce air quality impacts by coordinating with the District, project applicants, and other interested parties.

Policy AR-1.7: Neighboring jurisdictions. The City shall work with neighboring jurisdictions and affected agencies to address cross-jurisdictional and regional transportation and air quality issues.

Policy AR-1.9: Air quality and planning. The City shall consider air quality when planning the land uses and transportation systems to accommodate the expected growth in this community.

Policy AR-1.12: Affordable housing access to alternate mode of travel. The City shall work with the Housing Authority, transit providers, and developers to encourage the construction of low income housing developments that use transit-oriented and pedestrian-oriented design principals.

Policy AR-1.14: Public education. The City shall work to improve the public's understanding of the land use, transportation, and air quality link.

Goal AR-2: To reduce the air quality impacts of motor vehicle use.

> **Policy AR-2.1**: Trip reduction programs. The City shall promote the implementation of innovative employer-based trip reduction programs for employees.
>
> **Policy AR-2.5**: Commute reduction. The City shall promote the expansion of employment opportunities in Patterson to reduce the volume and distance of home-to-work commute trips by motor vehicle.

Goal AR-3: To Reduce traffic congestion and vehicle trips through more efficient infrastructure and support for trip reduction programs. Reduce the air quality impacts of motor vehicle use.

> **Policy AR-3.1**: Priority to existing roadways. The City shall consider measures to increase the capacity of the existing road network prior to constructing more capacity (additional lanes, new freeways, etc.).
>
> **Policy AR-3.2**: Promote alternate modes of travel. The City shall work with employers and developers to provide employees and residents with attractive, affordable transportation alternatives.
>
> **Policy AR-3.4**: Intersection design. Major intersections shall be designed to minimize situations (such as long vehicle delays) which can adversely affect localized air quality.

Goal AR-4: Minimize exposure of the public to toxic air pollutant emissions and noxious odors from industrial, manufacturing, and processing facilities.

> **Policy AR-4.1**: Sensitive receptors. The City shall, to the extent practicable, separate sensitive land uses from significant sources of air pollutants or odor emissions. Sensitive land uses include, but are not limited to, those that support people or other organisms that may have a significantly increased sensitivity or exposure to air pollution by virtue of their age and health (e.g. schools, day care centers, hospitals, nursing homes), status (e.g. sensitive or endangered species), or proximity to the source. The City shall require residential development projects and projects categorized as sensitive receptors to be located an adequate distance from existing and potential sources of toxic emissions such as freeways, major arterials, industrial sites, and hazardous material locations. For purposes of compliance with this policy, the City will be guided by the recommendations provided in the Air Quality and Land Use Handbook: A Community Health Perspective published by the California Air Resources Board.
>
> **Policy AR-4.2**: Industrial uses. The City shall notify, and coordinate with, the San Joaquin Valley Unified Air Pollution Control District when industrial developments are proposed that may adversely impact air quality. Such coordination may include, but is not limited to, providing assistance to applicants in complying with applicable air quality regulations.

Goal AR-5: Reduce particulate emissions from sources under the jurisdiction of the city.

Policy AR-5.1: Particulates from grading. The City shall work with the District to reduce particulate emissions from construction, grading, excavation, and demolition to the maximum extent feasible.

Policy AR-5.2: Roadways. The City shall require all access roads, driveways, and parking areas serving new commercial and industrial development to be constructed with materials that minimize particulate emissions and are appropriate to the scale and intensity of use.

Policy AR-5.3: City maintained roads. The City shall reduce PM10 emissions from City/County maintained roads to the maximum extent feasible.

Goal AR-6: Reduce emissions related to energy consumption and area sources.

Policy AR-6.1: Energy efficient design. The City shall work with the local energy providers and developers on voluntary incentive-based programs to encourage the use of energy efficient designs and equipment.

Policy AR-6.2: Energy conservation standards. The City shall cooperate with the local building industry, utilities and the District to promote enhanced energy conservation standards for new construction.

Policy AR-6.3: Vehicle idling reduction. The City shall implement circulation improvements that reduce vehicle idling.

Goal AR-7: To reduce the emission of greenhouse gases and to promote energy efficiency.

Policy AR-7.1: Climate Action Plan. The City shall comply with the relevant provisions of State law (i.e. AB 32 and SB 375) to minimize the effect of citywide greenhouse gas emissions associated with buildout of the General Plan. This shall be achieved through the implementation of a Climate Action Plan.

Policy AR-7.2: Greenhouse gas reduction goal. The City shall work with the Air Resources Board and the San Joaquin Valley Unified Air Pollution Control District to comply with statewide greenhouse gas reduction goals as established in the Global Warming Solutions Act of 2006 (AB 32) for 2020, and subsequent goals.

Policy AR-7.4: Greenhouse gas emissions from new development. The City shall implement measures to reduce the emission of greenhouse gases from new development. Such measures may include, but are not limited to, the following:

a. Discouraging auto-dependent patterns of development;
b. Promoting compact, mixed-use, pedestrian-friendly, and transit oriented development;
c. Promoting energy-efficient building design and site planning using either Build It Green and LEED™ Silver standards for residential and non-residential buildings, respectively; and

d. Working to improve the ratio of jobs to housing.

Policy AR-7.5: Passive solar heating. To the extent feasible, the City shall require the orientation of buildings to maximize passive solar heating during cool seasons, avoid solar heat gain in warm seasons, enhance natural ventilation and effective use of daylight, and to maximize opportunities for the installation of solar panels.

Implementation Measures

AR-5: The City shall, within 24 months of adoption of the General Plan, prepare and adopt a comprehensive Climate Action Plan that includes but is not limited to the following components:

1. Strategies for public involvement and input;
2. A baseline inventory of greenhouse gas (GHG) emissions from all sources within the city;
3. Emissions reduction targets and deadlines, enforceable reduction measures, and programmatic guidance for individual projects to achieve compliance with the Plan;
4. A program of regular review of progress toward emissions reduction targets;
5. A green building program that includes adoption of an ordinance which requires Build It Green certification for all new housing and LEED Silver certification for all non-residential buildings;
6. A renewable energy portfolio standard of 33% for both investor-owned and publicly-owned utilities.

AR-6: The City shall require all of the following as a condition of project approval of future development projects:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
- With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition.
- When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.

- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.
- Within urban areas, trackout (earth material deposited on City streets by construction equipment) shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.
- Any site with 150 or more vehicle trips per day shall prevent carryout and track out.
- Limit traffic speeds on unpaved roads to 15 mph;
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site;
- Install wind breaks at windward side(s) of construction areas;
- Suspend excavation and grading activity when winds exceed 20 mph; and

Limit area subject to excavation, grading, and other construction activity at any one time. Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation.

AR-7: The following measures shall be incorporated into the design of projects to be constructed within the City of Patterson to minimize operational emissions:

a) Bike racks shall be provided at proposed commercial land uses and schools, at a minimum rate of one bike rack space per 20 vehicle parking spaces;
b) Non-residential projects should include facilities for bike commuters including showers, lockers and changing space.
c) Multi-unit residential projects shall include long term bike parking facilities (locker, locked room or standard bike rack under surveillance;
d) Bike lanes (Class II) shall be provided on all arterials and linked to a regional bikeway network;
e) Sidewalks shall be provided on all roadways to facilitate pedestrian access to land uses;
f) New roads and major roadway improvements shall provide adequate roadway widths to safely accommodate buses and provide bus turn-outs and shelters as needed to serve proposed commercial and industrial land uses, and schools;
g) Commercial projects shall consider charging for parking (if determined to be feasible by the City Council) to entice use of the transit system;
h) Parking lots shall provide pedestrian pathways that connect to transit facilities;
i) Facilities for charging electric vehicles shall should be provided as an amenity for residential land uses;
j) Electrical outlets shall be provided to facilitate use of electrical landscape maintenance equipment;
k) Residential units shall be pre-wired with internet cables/lines to facilitate telecommuting;
l) Wood-burning heaters and fireplaces shall be prohibited; and

m) Energy conservation measures shall be implemented to exceed Title 24 requirements, and may include reflective roofing materials, energy efficient lighting, appliances, heating and cooling systems, use of natural lighting (skylights or solar tubes), and use of awnings and overhangs.

AR-8: The following measures shall be required as a condition of approval for development projects with the potential to have adverse air quality impacts to sensitive land uses:

- Maintain a minimum 500 foot separation between sensitive land uses and the Interstate 5 freeway;
- Maintain a minimum 1,000 foot separation between sensitive land uses and major rail yards;
- Maintain a minimum 1,000 foot separation between sensitive land uses and major distribution centers (more than 100 trucks per day);
- Maintain a minimum 300 foot separation between sensitive land uses and dry cleaning operations (500 feet for operations with two or more machines); and
- Maintain a minimum 50 foot separation between sensitive land uses and gasoline dispensing facilities (300 feet if throughput exceeds 3.6 million gallons per year).

AR-9: When a project could expose sensitive receptors to toxic air contaminants the City shall require an applicant to perform a prioritization on all sources of emissions in accordance with guidelines adopted by the San Joaquin Unified Air Pollution Control District to determine if it is necessary to conduct a Health Risk Assessment. If a project has a prioritization score of 10 or more, the project has the potential to exceed the District's significance threshold for health impacts of 10 in a million and a Health Risk Assessment shall be performed.

IMPACT ANALYSIS

Standards of Significance

Appendix G, of the California Environmental Quality Act (CEQA) Guidelines (Environmental Checklist) contains a list of project effects that may be considered significant. The HEU Plan would result in a significant impact if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations;
- Result in other emissions (such as those leading to odors) affecting a substantial number of people;
- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The SJVAPCD has developed the Guide for Assessing and Mitigating Air Quality Impacts (SJVAPCD 2015), also known as the GAMAQI. The thresholds of significance listed below, obtained from the SJVAPCD's GAMAQI, are used to determine whether a proposed project would result in a significant air quality impact. These thresholds do not necessarily apply to plans

1) Construction Emissions of PM. Construction projects are required to comply with Regulation VIII as listed in the SJVAPCD. However, the size of the project and the proximity to sensitive receptors may warrant additional measures.

2) Criteria Air Pollutant Emissions. SJVAPCD currently adopted thresholds of significance for criteria pollutant emissions and their application is presented in Table 4. These thresholds address both construction and operational emissions from individual projects. Note that the District treats permitted equipment and activities separately. The HEU Plan is not considered a source of SO_X emissions and would have relatively low CO emissions.

3) Ambient Air Quality. Emissions that are predicted to cause or contribute to a violation of an ambient air quality would be considered a significant impact. SJVAPCD recommends that dispersion modeling be conducted for construction or operation when on-site emissions exceed 100 pounds per day after implementation of all mitigation measures.

4) Local CO Concentrations. Traffic emissions associated with the proposed HEU Plan would be considered significant if the Plan contributes to CO concentrations at receptor locations in excess of the ambient air quality standards.

5) Toxic Air Contaminants (TACs) or Hazardous Air Pollutants (HAPs). Exposure to HAPs or TACs would be considered significant if the probability of contracting cancer for the Maximally Exposed Individual would exceed 20 in 1 million or would result in a Hazard Index greater than 1 for non-cancer health effects.

6) Odors. Odor impacts associated with the proposed HEU Plan would be considered significant if the Plan has the potential to frequently expose members of the public to objectionable odors through development of a new odor source or placement of receptors near an existing odor source.

7) Greenhouse Gases (GHGs). In SJVAPCD's *Guidance for Valley Land-Use Agencies in Addressing GHG Emissions Impacts for New Projects Under CEQA*, the District establishes a requirement that land use development projects demonstrate a 29 percent reduction in GHG emissions from Business-As-Usual (BAU).

8) With respect to cumulative air quality impacts, the GAMAQI provides that any proposed project that would individually have a significant air quality impact (i.e., exceed significance thresholds for criteria pollutants ROG, NOx, or PM_{10}) would also be considered to have a significant cumulative impact. In cases where project emissions are all below the applicable significance thresholds, a project may still contribute to a significant cumulative impact if there are other projects nearby whose emissions would

combine with project emissions to result in an exceedance of one or more significance thresholds for criteria pollutants.

Table 4. SJVAPCD Air Quality Thresholds of Significance – Criteria Pollutant Emission Levels in Tons Per Year

Pollutant/Precursor	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
Carbon Monoxide (CO)	100	100	100
Nitrogen Oxides (NOx)	10	10	10
Reactive Organic Gases (ROG)	10	10	10
Sulfur Dioxide (SOx)	27	27	27
Particulate Matter – PM_{10}	15	15	15
Particulate Matter – $PM_{2.5}$	15	15	15
Source: San Joaquin Valley Air Pollution Control District, GAMAQI, Page 80, Table 2 or website at http://www.valleyair.org/transportation/0714-GAMAQI-Criteria-Pollutant-Thresholds-of-Significance.pdf.			

Small Project Analysis Levels

In the interest of streamlining CEQA requirements, SJVAPCD has published the maximum project sizes that would clearly have criteria air pollutant emissions that are below the thresholds of significance listed in Table 4. The screening size of projects are listed in Table 5, assuming residential projects do not have unique features that attract heavy-duty truck trips. Projects that are smaller than the sizes listed in Table 5 are not required to quantify criteria air pollutant emissions for CEQA purposes.

Table 5. Residential Land Use Screening Sizes

Land Use Type	Size	Unit
Single Family	155	Dwelling Unit
Apartment, Low Rise	224	Dwelling Unit
Apartment, Mid Rise	225	Dwelling Unit
Apartment, High Rise	340	Dwelling Unit
Condominiums/Townhouse	256	Dwelling Unit
Condominiums, High Rise	352	Dwelling Unit
Mobile Home Park	292	Dwelling Unit
Retirement Community	580	Dwelling Unit
Congregate Care Assisted Living	536	Dwelling Unit

AIR QUALITY IMPACTS

Impact AQ-1: **<u>Regional air pollutant emissions</u>. Result in a cumulatively considerable net increase of any criteria pollutant for which the HEU Plan region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

The San Joaquin Valley Area is in State-level non-attainment for O_3, PM_{10}, and $PM_{2.5}$ and Federal-level non-attainment for O_3. The SJVAPCD does not provide criteria pollutant thresholds for plans, such as the HEU Plan. Thresholds of significance for criteria pollutants are established at the project-level by the SJVAPCD (Table 4). These would apply to individual projects built out under the HEU Plan. As such, there is no programmatic threshold of significance established for criteria pollutants for which to compare the proposed HEU Plan .

Two types of impacts would be associated with the HEU: 1.) construction period emissions and 2.) non-permitted operational period emissions. The thresholds identified in Table 4 would apply to these impacts for judging the level of significance. The HEU allows for a large range of project sizes that could have various levels of impacts. Most projects that are constructed as infill or on vacant sites would likely have emissions below the levels of significance for both construction and operational periods. Large masterplan projects may have emissions that exceed significance thresholds.

HEU Plan Construction Period Emission

Individual construction projects associated with the HEU Plan would result in temporary emissions from construction activities associated with activities that include demolition, site grading, asphalt paving, building construction, and architectural coating. Emissions commonly associated with construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips. During construction, fugitive dust, the dominant source of PM_{10} and $PM_{2.5}$ emissions, is generated when wheels or blades disturb surface materials. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby.

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site deposit mud on local streets, which is an additional source of airborne dust after it dries. Construction exhaust emissions include those from equipment (i.e., off-road) and traffic (on-road vehicles and trucks). Off-road construction equipment is often diesel-powered and can be a substantial source of NO_X emissions, in addition to PM_{10} and $PM_{2.5}$ emissions. In addition, NO_X emissions are also caused during grading and soil import/export. Architectural coatings and application of asphalt pavement are dominant sources of ROG emissions.

Site preparation and disturbance (e.g., vehicle travel on exposed areas) would likely result in the greatest emissions of dust that includes $PM_{10}/PM_{2.5}$. Windy conditions during construction could cause substantial emissions of $PM_{10}/PM_{2.5}$. The SJVAPCD's GAMAQI emphasizes implementation of effective and comprehensive control measures. SJVAPCD adopted a set of PM_{10} fugitive dust rules collectively called Regulation VIII. This regulation essentially prohibits the emissions of visible dust (limited to 20-percent opacity) and requires that disturbed areas or soils be stabilized. Prior to construction of each project phase, the applicant would be required to submit a dust control plan that meets the regulation requirements. These plans are reviewed by

SJVAPCD and construction cannot begin until District approval of the dust control plan is obtained. The rules pertaining to construction activities generally require:

- Effective dust suppression (e.g., watering) for land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill and demolition activities.
- Effective stabilization of all disturbed areas of a construction site, including storage piles, not used for seven or more days.
- Control of fugitive dust from on-site unpaved roads and off-site unpaved access roads.
- Removal of accumulations of mud or dirt at the end of the workday or once every 24 hours from public paved roads, shoulders and access ways adjacent to the site.
- Cease outdoor construction activities that disturb soils during periods with high winds.
- Record keeping for each day dust control measures are implemented.
- Limit traffic speeds on unpaved roads to 15 mph.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Landscape or replant vegetation in disturbed areas as quickly as possible.
- Prevent the tracking of dirt on public roadways. Limit access to the construction sites, so tracking of mud or dirt on public roadways can be prevented. If necessary, use wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- Suspend grading activity when winds (instantaneous gusts) exceed 25 mph or dust clouds cannot be prevented from extending beyond the site.

Implementation of an approved dust control plan would reduce emissions by at least 50 percent and up to 80 percent with aggressive measures[6].

HEU Plan Operational Period Emissions

Implementation of the HEU Plan would result in long-term area and mobile source emissions from operation and use of subsequent development. There are no significance thresholds applicable to emissions associated with plan-level development; however, there are project-level thresholds (shown in Table 4). There are project-level thresholds of 10 pounds per average day for NOx, and ROG, 15 pounds per average day for PM_{10} and $PM_{2.5}$, and 100 pounds per average day for CO.

CalEEMod Modeling

The California Emissions Estimator Model (CalEEMod) was used to predict potential operational emissions associated with the total build out of HEU Plan. Operational air emissions from the HEU Plan would be generated primarily from autos driven by future residents. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical ROG emissions from these types of land uses.

CalEEMod Land Uses

[6] Based on modeling of dust control measures using CalEEMod for a combination of control measures that include aggressive site watering, reduced vehicle speed, and use of dust palliatives.

A complete operational model scenario for year 2040 was developed for CalEEMod. Inputs are summarized in Table 6.

Table 6. Operational Land Uses Entered into CalEEMod

Land Uses	Size	Units
Proposed HEU Plan Land Uses		
Single Family Housing	2,829	Dwelling Units
Apartments Low Rise	2,090	Dwelling Units

Model Year

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CalEEMod. Emissions associated with build-out later than 2040 would be lower.

Traffic Inputs

The CalEEMod default trip generation rates were utilized along with the forecasted trip lengths to calculate emissions from HEU Plan traffic. The CalEEMod daily trip generation is based on the 10th Edition ITE trip generation rates and the size and type of HEU Plan land uses. The model predicts the HEU Plan would produce 42,005 daily weekday trips. The trip length was computed by dividing the forecasted VMT by the number of trips. The traffic study predicts 16.65 miles per capita.[7] Based on the California Department of Finance population projections, there are 3.57 persons per household in Patterson.[8] Based on 4,919 new households, the HEU could be associated with a population increase of 17,561 people. This would equate to a daily VMT increase of 292,388 miles per day. The average trip length was calculated at 6.96 miles. Additionally, the fleet mix was adjusted according to the SJVAPCD residential fleet mix.[9]

Energy

CalEEMod defaults for energy use were used which include the 2019 Title 24 Building Standards. These defaults are conservative, as the HEU Plan would need to meet the latest Title 24 Building Standards. GHG emissions modeling includes those indirect emissions from electricity consumption. For the HEU Plan, an emission factor of 55 pounds of CO_2 per megawatt of electricity produced was entered into CalEEMod, which is based on Pacific Gas & Electric Company's (PG&E) average annual content power label for 2021-2023.[10]

[7] Kittelson & Associates., *City of Patterson Housing Element – Vehicle Miles Traveled (VMT) Impact Assessment Memorandum DRAFT*, September 4, 2025.
[8] State of California, Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025" Accessed: May 6, 2025. Available at: https://dof.ca.gov/Forecasting/Demographics/Estimates/.
[9] Valley Air District. "District Accepted Fleet Mix for Residential Projects". Accessed: September 9,2025. Available at: https://www.valleyair.org/media/cfdag21r/residential-fleet-mix.pdf
[10] Annual Power Content Labels for 2023. Web: https://www.energy.ca.gov/filebrowser/download/7281

Wood-Burning Devices

CalEEMod default inputs assume new residential construction would include wood-burning fireplaces and stoves. The new HEU Plan residential uses would not include wood-burning devices, as these devices are prohibited by Patterson General Plan Implementation Measure AR-7. Therefore, the number of woodstoves for new HEU Plan residential uses in CalEEMod were set to zero.

Other Inputs

Default model assumptions for emissions associated with solid waste generation were used. Wastewater treatment for the proposed HEU Plan was changed to 100-percent aerobic conditions to represent the use of city services (i.e., the HEU would not send wastewater to septic tanks or facultative lagoons).

Summary of Operational Period Emissions

Table 7 reports the predicted emissions from complete build out of the HEU Plan area in terms of average tons per year operational emissions. There are no emission thresholds that apply to potential emissions generated by a plan, such as the HEU Plan. As shown in Table 7, average tons per year emissions for NO_x, ROG, PM_{10}, and CO would exceed the SJVAPD significance thresholds that is applied to projects. *Attachment 1* to this report includes the operational assumptions, CalEEMod model output files, and emissions calculations for the HEU Plan.

Table 7. HEU Plan Operational Period Emissions

	Annual Emissions in tons/year				
Scenario	**NOx**	**ROG**	**PM_{10}[1]**	**$PM_{2.5}$[1]**	**CO**
HEU Plan in 2040	18.04	48.57	37.33	9.90	127.63
SJVAPD Project-Level Thresholds (tons per year)	*10 tons/yr*	*10 tons/yr*	*15 tons/yr*	*15 tons/yr*	*100[2] tons/yr*

[1]Includes both exhaust and fugitive dust emissions.
[2]Significant if emissions exceed 100 tons per year and then contribute to violation of the NAAQS/CAAQS

Measures to Reduce Air Pollutant Emissions

Patterson General Plan

There are several General Plan Policies and implementation measures that address construction measures which would apply to projects developed within the HEU Plan Area, including but not limited to:

> **Policy AR-1.3**: CEQA. The City shall use the CEQA process to identify and avoid or mitigate potentially significant air quality impacts of new development. The CEQA process shall be used to ensure early consultation with the San Joaquin Valley Unified Air Pollution

Control District concerning air quality issues associated with specific development proposals.

Policy AR-1.4: Air quality mitigation. The City shall ensure all air quality mitigation measures are feasible, implementable, and cost effective.

Policy AR-1.6: Innovative strategies. The City shall encourage innovative mitigation measures to reduce air quality impacts by coordinating with the District, project applicants, and other interested parties.

Policy AR-5.1: Particulates from grading. The City shall work with the District to reduce particulate emissions from construction, grading, excavation, and demolition to the maximum extent feasible.

Policy AR-6.3: Vehicle idling reduction. The City shall implement circulation improvements that reduce vehicle idling.

Implementation Measures

AR-6: The City shall require all of the following as a condition of project approval of future development projects:

- All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.
- All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
- All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
- With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition.
- When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

- Within urban areas, trackout (earth material deposited on City streets by construction equipment) shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.
- Any site with 150 or more vehicle trips per day shall prevent carryout and track out.
- Limit traffic speeds on unpaved roads to 15 mph;
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site;
- Install wind breaks at windward side(s) of construction areas;
- Suspend excavation and grading activity when winds exceed 20 mph; and

Limit area subject to excavation, grading, and other construction activity at any one time. Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation.

SJVAPCD - Indirect Source Review Rule (Rule 9510)

The SJVAPCD Indirect Source Review Rule (Rule 9510) applies to construction and operation of projects with mitigated emissions above 2.0 tons per year (tpy) of NOx or 2.0 tpy of PM_{10}. Regardless of whether a project's emissions of NOx or PM_{10} pollutants would exceed the Air District's CEQA significance thresholds for each pollutant, the projects are still required to comply with Rule 9510 to ensure that the projects contribute their fair share of emissions reductions in order to achieve the basin-wide reduction targets established in the Air District's Ozone and PM attainment plans. Rule 9510 requires that projects reduce uncontrolled exhaust emissions by 20 percent for NO_x and 45 percent for PM_{10} from calculated unmitigated levels. The basis for the reductions is an analysis using CalEEMod model. SJVAPCD encourages reductions through on-site mitigation measures. (Note: The use of the term "mitigation" under Rule 9510 does not refer to mitigation of impacts under CEQA; i.e., the ISR emission reduction percentages are required without regard to whether the CEQA emissions thresholds are exceeded or not.) Fees to purchase or sponsor off-site reductions through SJVAPCD apply when on-site mitigation measures do not achieve the required percentage of emissions reduction. For example, using less-polluting construction equipment, such as newer equipment or retrofitting older equipment reduces construction emissions on-site. A combination of on-site and off-site measures can be implemented to meet the overall emission reduction requirements. The uncontrolled emissions reported in Table 7 do not include the reductions required by Rule 9510.

SJVAPCD - Voluntary Emissions Reduction Agreement

For projects where it is not feasible to fully meet the required level of mitigation for project emissions through on-site measures developed under ISR (i.e., where ISR reductions would not reduce emissions to below Air District's thresholds), the project proponent and SJVAPCD would enter into a contractual agreement (i.e., Voluntary Emissions Reduction Agreement - VERA), under which the project proponent agrees to mitigate project-specific emissions by providing funds to the SJVAPCD. As mentioned above, the execution and implementation of VERAs would mitigate project-specific air quality impacts to less-than-significant levels under CEQA. Although

VERAs are nominally voluntary, in practice they must be executed and implemented in order to meet the CEQA requirement that impacts be mitigated to the extent feasible (CEQA Guidelines Section 15126.4(a)).

Mitigation Measure AQ-1: Require Project-Level Air Quality Assessments to Identify Specific Measures to Reduce Air Pollutant Emissions.

Under General Plan Policy AR-1.3, the City shall require individual projects to address air quality impacts. Projects that are larger in size than the small project analysis level screening sizes (see Table 5) shall prepare a project-level air quality analysis. Under Policy AR-1.4, the city shall require mitigation measures to reduce air pollutant emissions. Application of SJVAPCD Regulation VIII requires dust control measures for grading projects. Rule 9510 would require reductions in NOx and PM10 emissions of up to 20 and 45 percent, respectively. Project applicants would enter into a contractual agreement with SJVAPCD to provide funding to the District to implement emission reductions if emissions exceed thresholds with the implementation of Policy AR-1.4, Regulation VIII, and Rule 9510.

Impact AQ-2: **<u>Carbon monoxide concentrations.</u> Mobile emissions generated by traffic from HEU projects could increase carbon monoxide concentrations at intersections in Patterson. However, resulting concentrations would be below ambient air quality standards and below CEQA thresholds.**

Much of the emissions from construction and operation of HEU projects would be generated by traffic traveling to or from the HEU project sites. Construction would result in temporary traffic emissions. Emissions and ambient concentrations of CO have decreased greatly over the past 30 years. These improvements are due largely to the introduction of cleaner burning motor vehicles and reformulated motor vehicle fuels. No exceedances of the State or federal CO standards have been recorded at any of San Joaquin Valley's monitoring stations in the past 20 years. The San Joaquin Valley Air Basin has attained the State and National CO standards. This is demonstrated by monitoring data that includes monitoring stations in heavily urbanized areas with large traffic volumes. Patterson is a relatively rural area that does not have the intensity of traffic that larger cities in the Valley experience. Therefore, the potential for a single HEU project to cause CO levels to increase such that they would exceed an ambient air quality standard is negligible.

Impact AQ-3: **<u>Health risk impacts</u>. Expose sensitive receptors to substantial pollutant concentrations?**

A. TAC Effects from Construction of HEU Projects

Residential projects are not associated with TAC emissions that lead to health risk impacts or expose sensitive receptors to substantial pollutant concentrations. These types of impacts are associated with industrial type projects, highways, rail lines, or projects with sources permitted by SJVAPCD. However, construction of residential projects could temporarily expose nearby sensitive receptors. The TAC of concern is DPM emitted from diesel-fueled vehicles and equipment during construction of housing projects. The highest daily levels of DPM would be emitted during construction activities from use of heavy-duty diesel equipment such as loaders,

graders and diesel-fueled haul trucks. However, these emissions would be intermittent, vary throughout the area, and be of a temporary duration.

The City's General Plan policies address construction period emissions that lead to TAC emissions. **Policy AR-1.3** uses the CEQA process to identify and avoid or mitigate potentially significant air quality impacts of new development, including health risks. SJVAPCD's **Rule 9510** reduces PM_{10} emissions, which include DPM during construction, from larger projects. However, projects that are large and/or close to existing sensitive receptors could result in significant health risks.

B. TAC Effects on Housing Element Sensitive Receptors

The City's General Plan includes the following policies related to Air Quality that would serve to minimize health risk impacts. **Policy AR-4.1** and **Implementation Measure AR-9** addresses sensitive receptors, which is intended, to the extent practicable, to separate sensitive land uses from significant sources of air pollutants or odor emissions.

The HEU Plan may lead to the introduction of new sensitive receptors, in the form of residents, that may be exposed to substantial levels of air pollutants or TACs. Substantial sources of air pollution can adversely affect sensitive receptors proposed as part of new projects. Other Air Districts, such as the Bay Area Air District, recommend using a 1,000-foot screening radius around a project site for purposes of identifying community health risk from siting a new sensitive receptor or a new source of TACs. Nearby stationary sources of TACs (e.g., emergency back-up generators and gas stations) and traffic on local roadways could affect the proposed residences. Busy roadways include State Route 130 and State Route 33. The California Northern Rail line runs parallel to State Route 33. Diesel-powered locomotives use this rail line. Common stationary sources that should be considered include gasoline dispensing stations and standby diesel generations used for emergency power. CARB's land use and air quality handbook describes air pollutant and TAC sources and makes recommendations for setback distances. It should be noted that these recommendation are over 20 years old and do not reflect the latest emission control measures in place on many of the sources, including trucks, construction equipment and automobiles. SJVAPCD's policy regarding evaluation of health risks from these types of sources has also evolved since the time those recommendations were made.

Mitigation Measure for Impact AQ-3 (A): Implement Mitigation Measure AQ-1 that requires air quality analyses for larger residential projects.

Mitigation Measure for Impact AQ-3 (B): For HEU locations within the following recommended distances from identified sources of TACs, implement the mitigation measure listed below[11]:

- Interstate 5 – 500 feet (from edge of roadway),
- State Routes 33 and 130 – 200 feet (from edge of roadway),
- CNFR Rail Line – 200 feet,

[11] See *Air Quality and Climate Change* Implementing Measure AR-8.

- Warehouses/Distribution Centers – 1,000 feet (from loading docks)
- Gasoline Dispensing Stations – 300 feet (from edge of fueling canopy)

Site-specific modeling of future specific residential projects proposed within these distances would provide a more accurate basis upon which these buffer distances may be reconsidered and reduced.

For projects within the specified distances from identified sources, conduct a site-specific health risk assessment using air quality dispersion modeling methodologies and screening thresholds recommended by the SJVAPCD to demonstrate that, despite a location within the screening setback distances, modeled site-specific exposures would be below the SJVAPCD recommended threshold of 20 excess cancer risks.

Where residential sites are proposed to be located within the setback distances specified above, or identified through site-specific health risk assessment that indicates significant exposure, then appropriate air filtration systems (e.g., MERV13 or 16) systems shall be installed and maintained. The system effectiveness requirement shall be determined during final design, when the predicted level of exposure is known.

Impact AQ-4: Odors. Construction of HEU housing projects would result in temporary odors during construction.

During construction, the various diesel-powered vehicles and equipment in use on-site would create localized odors. These odors would be temporary and not likely to be noticeable for extended periods of time much beyond the project's site boundaries.

Once constructed, residential uses are not expected to generate any objectionable odors.

Mitigation Measure for Impact AQ-4: None proposed.

Cumulative Air Quality Impacts

The SJVAPCD has developed criteria to determine if a development project could result in potentially significant regional emissions. According to the GAMAQI, any proposed project that would individually have a significant air quality impact (i.e., exceed significance thresholds for ROG or NO_x) would also be considered to have a significant cumulative air quality impact. Impacts of local pollutants (CO and TACs) are cumulatively significant when modeling shows that the combined emissions from the project and other existing and planned projects will exceed significance thresholds recommended by SJVAPCD.

Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. This is measured by comparing a single project's emissions to significance thresholds.

Construction and operation would generate emission of air pollutants both locally and regionally. With implementation of dust control plan required by the SJVAPCD, and if necessary, additional emission reduction achieved through the District's ISR Rule 9510, and potentially through VERAs, construction period impacts would be below CEQA significance thresholds. Additional construction that may occur in the area concurrently with the project would be subject to SJVAPCD Regulation VIII, as well as the District's ISR Rule 9510, and potentially also VERAs, which would reduce cumulative construction emissions. Operational emissions from projects are expected to be below CEQA significance thresholds when in compliance with SJVAPCD requirements, and if necessary, through VERAs.

Greenhouse Gas Regulatory Framework

Setting

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO_2, CH_4, and N_2O are byproducts of fossil fuel combustion.
- N_2O is associated with agricultural operations such as fertilization of crops.
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and sulfur hexafluoride emissions are commonly created by industries such as aluminum production and semi-conductor manufacturing.

Each GHG has its own potency and effect upon the earth's energy balance. This is expressed in terms of a global warming potential (GWP), with CO_2 being assigned a value of 1 and sulfur hexafluoride being several orders of magnitude stronger. In GHG emission inventories, the weight of each gas is multiplied by its GWP and is measured in units of CO_2 equivalents (CO_2e).

An expanding body of scientific research supports the theory that global climate change is currently affecting changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive

diseases; more frequent and intense natural disasters such as flooding, hurricanes, and drought; and increased levels of air pollution.

Federal and Statewide GHG Emissions

The U.S. EPA reported that in 2022, total gross nationwide GHG emissions were 6,343.2 million metric tons (MMT) carbon dioxide equivalent (CO_2e).[12] These emissions were lower than peak levels of 7,416 MMT that were emitted in 2007. CARB updates the statewide GHG emission inventory on an annual basis where the latest inventory includes 2000 through 2022 emissions.[13] In 2022, GHG emissions from statewide emitting activities were 371.1 MMT CO_2e. The 2022 emissions have decreased by 24 percent since peak levels in 2004, are 9.3 MMT CO_2e lower than 2021 emissions level, and almost 60 MMT CO_2e below the State's 2020 GHG limit of 431 MMT CO_2e. Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 MT CO_2e per person to 9.5 MT CO_2e per person in 2022.

Recent Regulatory Actions for GHG Emissions

Executive Order S-3-05 – California GHG Reduction Targets

Executive Order (EO) S-3-05 was signed by Governor Arnold Schwarzenegger in 2005 to set GHG emission reduction targets for California. The three targets established by this EO are as follows: (1) reduce California's GHG emissions to 2000 levels by 2010, (2) reduce California's GHG emissions to 1990 levels by 2020, and (3) reduce California's GHG emissions by 80 percent below 1990 levels by 2050.

Assembly Bill 32 – California Global Warming Solutions Act (2006)

Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, codified the State's GHG emissions target by directing CARB to reduce the State's global warming emissions to 1990 levels by 2020. AB 32 was signed and passed into law by Governor Schwarzenegger on September 27, 2006. Since that time, the CARB, California Energy Commission (CEC), California Public Utilities Commission (CPUC), and Building Standards Commission have all been developing regulations that will help meet the goals of AB 32 and Executive Order S-3-05, which has a target of reducing GHG emissions 85 percent below 1990 levels.

The first Scoping Plan for AB 32 was adopted by CARB in December 2008. Its most recent update was completed in December of 2022[14]. It contains the State's main strategies to achieve carbon neutrality by 2045. This plan extends and expands upon the earlier versions with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. It also takes the step of adding carbon neutrality as a science-based guide and touchstone for California's climate work. Measures to achieve carbon neutrality include rapidly moving to zero emission vehicles (ZEV),

[12] United States Environmental Protection Agency, 2024. *Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2022*. February. Web: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks
[13] CARB. 2024. *California Greenhouse Gas Emission for 2000 to 2022*. Web: https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf
[14] CARB. 2022. Final 2022 Scoping Plan Update and Appendices. Web: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents

removing natural gas as an option for space conditioning, increasing the number of solar arrays and wind turbines, and scaling up renewable hydrogen for hard-to-electrify end uses.

Senate Bill 375 – California's Regional Transportation and Land Use Planning Efforts (2008)

California enacted legislation (SB 375) to expand the efforts of AB 32 by controlling indirect GHG emissions caused by urban sprawl. SB 375 provides incentives for local governments and applicants to implement new conscientiously planned growth patterns. This includes incentives for creating attractive, walkable, and sustainable communities and revitalizing existing communities. The legislation also allows applicants to bypass certain environmental reviews under CEQA if they build projects consistent with the new sustainable community strategies. Development of more alternative transportation options that would reduce vehicle trips and miles traveled, along with traffic congestion, would be encouraged. SB 375 enhances CARB's ability to reach the AB 32 goals by directing the agency in developing regional GHG emission reduction targets to be achieved from the transportation sector for 2020 and 2035. CARB works with the metropolitan planning organizations (e.g., ABAG and MTC) to align their regional transportation, housing, and land use plans to reduce VMT and demonstrate the region's ability to attain its GHG reduction targets.

Senate Bills 350 - Renewable Portfolio Standards

In September 2015, the California Legislature passed SB 350, which increased the states Renewables Portfolio Standard (RPS) for content of electrical generation from the 33 percent target for 2020 to a 50 percent renewables target by 2030.

Executive Order B-30-15 & Senate Bill 32 GHG Reduction Targets – 2030 GHG Reduction Target

In April 2015, Governor Brown signed EO B-30-15, which extended the goals of AB 32, setting a GHG emissions target at 40 percent of 1990 levels by 2030. On September 8, 2016, Governor Brown signed Senate Bill (SB) 32, which legislatively established the GHG reduction target of 40 percent of 1990 levels by 2030. In November 2017, CARB issued *California's 2017 Climate Change Scoping Plan*. [15] While the State is on track to exceed the AB 32 scoping plan 2020 targets, this plan is an update to reflect the enacted SB 32 reduction target.

SB 32 was passed in 2016, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. CARB has drafted a 2022 Scoping Plan Update to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32. The 2022 draft plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 or earlier.
- Focuses on strategies for reducing California's dependency on petroleum to provide

[15] California Air Resource Board, 2017. *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Targets.* November. Web: https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf

consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as a driving principle.
- Incorporates the contribution of natural and working lands to the state's GHG emissions, as well as its role in achieving carbon neutrality.
- Relies on the most up to date science, including the need to deploy all viable tools, including carbon capture and sequestration as well as direct air capture.
- Evaluates multiple options for achieving our GHG and carbon neutrality targets, as well as the public health benefits and economic impacts associated with each.

The Scoping Plan was updated in 2022 and lays out how the state can get to carbon neutrality by 2045 or earlier. It is the first Scoping Plan that adds carbon neutrality as a science-based guide and touchstone beyond statutorily established emission reduction targets.[16]

The mid-term 2030 target is considered critical by CARB on the path to obtaining an even deeper GHG emissions target of 80 percent below 1990 levels by 2050, as directed in Executive Order S-3-05. The 2022 Scoping Plan outlines the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure, providing a blueprint to continue driving down GHG emissions and to not only obtain the statewide goals, but cost-effectively achieve carbon-neutrality by 2045 or earlier. In the 2022 Scoping Plan, CARB recommends:

- VMT per capita reduced 12% below 2019 levels by 2030 and 22% below 2019 levels by 2045.
- 100% of Light-duty vehicle sales are zero emissions vehicles (ZEV) by 2035.
- 100% of medium duty/heavy duty vehicle sales are ZEV by 2040.
- 100% of passenger and other locomotive sales are ZEV by 2030.
- 100% of line haul locomotive sales are ZEV by 2035.
- All electric appliances in new residential and commercial building beginning 2026 (residential) and 2029 (commercial).
- 80% of residential appliance sales are electric by 2030 and 100% of residential appliance sales are electric by 2035.
- 80% of commercial appliance sales are electric by 2030 and 100% of commercial appliance sales are electric by 2045.

SB 743 Transportation Impacts

Senate Bill 743 required lead agencies to abandon the old "level of service" metric for evaluating a project's transportation impacts, which was based solely on the amount of delay experienced by motor vehicles. In response, the Governor's Office of Planning and Research (OPR) developed a VMT metric that considered other factors such as reducing GHG emissions and developing multimodal transportation.[17] A VMT-per-capita metric was adopted into the CEQA Guidelines

[16] https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents
[17] Governor's Office of Planning and Research. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December.

Section 15064.3 in November 2017. Given current baseline per-capita VMT levels computed by CARB in the 2017 Scoping Plan of 22.24 miles per day for light-duty vehicles and 24.61 miles per day for all vehicle types, the reductions needed to achieve the 2050 climate goal are 16.8 percent for light-duty vehicles and 14.3 percent for all vehicle types combined. Based on this analysis (as well as other factors), OPR recommended using a 15-percent reduction in per capita VMT as an appropriate threshold of significance for evaluating transportation impacts.

Executive Order B-55-18 – Carbon Neutrality

In 2018, a new statewide goal was established to achieve carbon neutrality as soon as possible, but no later than 2045, and to maintain net negative emissions thereafter. CARB and other relevant state agencies are tasked with establishing sequestration targets and creating policies/programs that would meet this goal.

Senate Bill 100 – Current Renewable Portfolio Standards

In September 2018, SB 100 was signed by Governor Brown to revise California's RPS program goals, furthering California's focus on using renewable energy and carbon-free power sources for its energy needs. The bill would require all California utilities to supply a specific percentage of their retail sales from renewable resources by certain target years. By December 31, 2024, 44 percent of the retails sales would need to be from renewable energy sources, by December 31, 2026 the target would be 40 percent, by December 31, 2027 the target would be 52 percent, and by December 31, 2030 the target would be 60 percent. By December 31, 2045, all California utilities would be required to supply retail electricity that is 100 percent carbon-free and sourced from eligible renewable energy resource to all California end-use customers.

California Building Standards Code – Title 24 Part 11 & Part 6

The California Green Building Standards Code (CALGreen Code) is part of the California Building Standards Code under Title 24, Part 11.[18] The CALGreen Code encourages sustainable construction standards that involve planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2022 California Building Standard Code) was effective as of January 1, 2023.[19]

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the CEC. This code includes design requirements to conserve energy in new residential and non-residential developments, while being cost effective for homeowners. This Energy Code is enforced and verified by cities during the planning and building permit process. The current energy efficiency standards (2022 Energy Code) replaced the 2019 Energy Code as of January 1, 2023. Under the 2019 standards, single-family homes are predicted to be 53 percent more efficient than homes built under the 2016 standard due to more stringent energy-efficiency standards and mandatory installation of solar photovoltaic systems. For nonresidential

[18] See: https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#:~:text=CALGreen%20is%20the%20first%2Din,to%201990%20levels%20by%202020.

[19] The 2025 CAL Green Code will become effective January 1, 2026 and will apply to this Plan Area Update.

developments, it is predicted that these buildings will use 30 percent less energy due to lightening upgrades.[20]

Requirements for electric vehicle (EV) charging infrastructure are set forth in Title 24 of the California Code of Regulations. The CALGreen standards consist of a set of mandatory standards required for new development, as well as two more voluntary standards known as Tier 1 and Tier 2. The CalGreen 2022 standards require deployment of additional EV chargers in various building types, including multifamily residential and nonresidential land uses. They include requirements for both EV capable parking spaces and the installation of Level 2 EV supply equipment for multifamily residential and non-residential buildings. There are also requirements for both EV readiness and installation of EV chargers, and mandatory requirements and more aggressive voluntary Tier 1 and Tier 2 provisions. Providing EV charging infrastructure that meets current CALGreen requirements will not be sufficient to power the anticipated more extensive level of EV penetration in the future that is needed to meet SB 30 climate goals.

CEC studies have identified the most aggressive electrification scenario as putting the building sector on track to reach the carbon neutrality goal by 2045.[21] Installing new natural gas infrastructure in new buildings will interfere with this goal. To meet the State's goal, communities have been adopting "Reach" codes that prohibit natural gas connections in new and remodeled buildings. However, these reach codes have been challenged in court and have been found to be unlawful. Therefore, communities in California are struggling to limit natural gas use by new construction.

An update to the current CALGreen Energy Code will be effective on January 1, 2026, with the adoption of the 2025 Energy Code.[22] The 2025 standards were adopted at the September 11, 2024 CEC business meeting and will go to the California Building Standards Commission for approval as part of California's Building Standards Code before the end of 2024. It will apply to newly constructed buildings, additions, and alterations and focus on:

- Expanding the use of heat pumps for space conditioning and water heating in newly constructed single-family, multifamily, and select nonresidential buildings.
- Encouraging electric-ready buildings to set up owners to use cleaner electric water heating and cooking when they are ready to invest in those technologies.
- Updating photovoltaic and battery energy storage system standards for high-rise multifamily and nonresidential buildings to achieve cost effective installations in consideration of revised net billing and virtual net billing rules.
- Updating space conditioning system control standards for nonresidential buildings.
- Updating ventilation requirements in multifamily buildings to improve indoor air quality.

Advanced Clean Cars

The Advanced Clean Cars Program, originally adopted by CARB in 2012, was designed to bring together CARB's traditional passenger vehicle requirements to meet federal air quality standards

[20] See: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf
[21] California Energy Commission. 2021. F*inal Commission Report: California Building Decarbonization Assessment. Publication Number CEC-400-2021-006-CMF*.August
[22] CEC 2025 California Energy Code Fact Sheet, September 2024. https://www.energy.ca.gov/sites/default/files/2024-09/2025_California_Energy_Code_Fact_Sheet_ada.pdf

and also support California's AB 32 goals to develop and implement programs to reduce GHG emissions back down to 1990 levels by 2020, a goal achieved in 2016 as a result of numerous emissions reduction programs.

Advanced Clean Cars II (ACC II) is phase two of the original rule. ACC II establishes a year-by-year process, starting in 2026, so all new cars and light trucks sold in California will be zero-emission vehicles by 2035. The regulation codifies the light-duty vehicle goals set out in Governor Newsom's Executive Order N-79-20. Currently, 16 percent of new light-duty vehicles sold in California are zero emissions or plug-in hybrids. By 2030, 68 percent of new vehicles sold in California would be zero emissions and 100 percent by 2035.

City of Patterson General Plan

The City of Patterson General Plan's Air Resources and Climate Change Element includes policies and goals to reduce exposure of the City's sensitive population to exposure of GHG emissions. The following goals and policies are applicable to the HEU Plan:

Goal AR-2: To reduce the air quality impacts of motor vehicle use.

> **Policy AR-2.1**: Trip reduction programs. The City shall promote the implementation of innovative employer-based trip reduction programs for employees.
>
> **Policy AR-2.5**: Commute reduction. The City shall promote the expansion of employment opportunities in Patterson to reduce the volume and distance of home-to-work commute trips by motor vehicle.

Goal AR-3: To Reduce traffic congestion and vehicle trips through more efficient infrastructure and support for trip reduction programs. Reduce the air quality impacts of motor vehicle use.

> **Policy AR-3.2**: Promote alternate modes of travel. The City shall work with employers and developers to provide employees and residents with attractive, affordable transportation alternatives.

Goal AR-6: Reduce emissions related to energy consumption and area sources.

> **Policy AR-6.1**: Energy efficient design. The City shall work with the local energy providers and developers on voluntary incentive-based programs to encourage the use of energy efficient designs and equipment.
>
> **Policy AR-6.2**: Energy conservation standards. The City shall cooperate with the local building industry, utilities and the District to promote enhanced energy conservation standards for new construction.
>
> **Policy AR-6.3**: Vehicle idling reduction. The City shall implement circulation improvements that reduce vehicle idling.

Goal AR-7: To reduce the emission of greenhouse gases and to promote energy efficiency.

Policy AR-7.1: Climate Action Plan. The City shall comply with the relevant provisions of State law (i.e. AB 32 and SB 375) to minimize the effect of citywide greenhouse gas emissions associated with buildout of the General Plan. This shall be achieved through the implementation of a Climate Action Plan.

Policy AR-7.2: Greenhouse gas reduction goal. The City shall work with the Air Resources Board and the San Joaquin Valley Unified Air Pollution Control District to comply with statewide greenhouse gas reduction goals as established in the Global Warming Solutions Act of 2006 (AB 32) for 2020, and subsequent goals.

Policy AR-7.4: Greenhouse gas emissions from new development. The City shall implement measures to reduce the emission of greenhouse gases from new development. Such measures may include, but are not limited to, the following:

a. Discouraging auto-dependent patterns of development;
b. Promoting compact, mixed-use, pedestrian-friendly, and transit oriented development;
c. Promoting energy-efficient building design and site planning using either Build It Green and LEED™ Silver standards for residential and non-residential buildings, respectively; and
d. Working to improve the ratio of jobs to housing.

Policy AR-7.5: Passive solar heating. To the extent feasible, the City shall require the orientation of buildings to maximize passive solar heating during cool seasons, avoid solar heat gain in warm seasons, enhance natural ventilation and effective use of daylight, and to maximize opportunities for the installation of solar panels.

Implementation Measures

AR-5: The City shall, within 24 months of adoption of the General Plan, prepare and adopt a comprehensive Climate Action Plan that includes but is not limited to the following components:

1. Strategies for public involvement and input;
2. A baseline inventory of greenhouse gas (GHG) emissions from all sources within the city;
3. Emissions reduction targets and deadlines, enforceable reduction measures, and programmatic guidance for individual projects to achieve compliance with the Plan;
4. A program of regular review of progress toward emissions reduction targets;
5. A green building program that includes adoption of an ordinance which requires Build It Green certification for all new housing and LEED Silver certification for all non-residential buildings;
6. A renewable energy portfolio standard of 33% for both investor-owned and publicly-owned utilities.

AR-7: The following measures shall be incorporated into the design of projects to be constructed within the City of Patterson to minimize operational emissions:

a) Bike racks shall be provided at proposed commercial land uses and schools, at a minimum rate of one bike rack space per 20 vehicle parking spaces;
b) Non-residential projects should include facilities for bike commuters including showers, lockers and changing space.
c) Multi-unit residential projects shall include longterm bike parking facilities (locker, locked room or standard bike rack under surveillance;
d) Bike lanes (Class II) shall be provided on all arterials and linked to a regional bikeway network;
e) Sidewalks shall be provided on all roadways to facilitate pedestrian access to land uses;
f) New roads and major roadway improvements shall provide adequate roadway widths to safely accommodate buses and provide bus turn-outs and shelters as needed to serve proposed commercial and industrial land uses, and schools;
g) Commercial projects shall consider charging for parking (if determined to be feasible by the City Council) to entice use of the transit system;
h) Parking lots shall provide pedestrian pathways that connect to transit facilities;
i) Facilities for charging electric vehicles shall should be provided as an amenity for residential land uses;
j) Electrical outlets shall be provided to facilitate use of electrical landscape maintenance equipment;
k) Residential units shall be pre-wired with internet cables/lines to facilitate telecommuting;
l) Wood-burning heaters and fireplaces shall be prohibited; and
m) Energy conservation measures shall be implemented to exceed Title 24 requirements, and may include reflective roofing materials, energy efficient lighting, appliances, heating and cooling systems, use of natural lighting (skylights or solar tubes), and use of awnings and overhangs.

GHG Significance Thresholds

SJVAPCD does not have any current guidance or significance thresholds for GHG emissions. The District's currently posted CEQA guidance for GHG address prior state goals that were met in 2020. As discussed previously, the State's mid-term 2030 target is 40 percent below 1990 levels and carbon neutrality by 2045. The Bay Area Air District developed thresholds for land use projects to address consistency with the State's goals to reduce GHG emissions:

Plan Level

1. Meet State's goals to reduce emissions to 40% below 1990 levels by 2030 and carbon neutrality by 2045; or:
2. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b)

Project Level

A. Projects must include, at a minimum, the following project design elements:
   a. Buildings

i. The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).
ii. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

b. Transportation
   i. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
      1. Residential Projects: 15 percent below the existing VMT per capita
      2. Office Projects: 15 percent below the existing VMT per employee
      3. Retail Projects: no net increase in existing VMT
   ii. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Any new land use project would have to include either section A or B from the above list, not both, to be considered in compliance with the Bay Area Air District's GHG thresholds of significance. The City has not adopted a Climate Action Plan or GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Changes to GHG emissions associated with the HEU Plan would occur from temporary construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term changes to operational emissions associated with vehicular traffic within the HEU Plan vicinity, energy and water usage, and solid waste disposal. Changes to long term GHG emissions are discussed below.

CalEEMod Modeling

CalEEMod was used to predict GHG emissions from operation of the HEU Plan assuming full build-out of the HEU Plan area. The HEU Plan land use types and size and other project-specific information were input to the model, as described above within the operational period emissions. CalEEMod output is included in *Attachment 1*.

GHG Emissions

The CalEEMod model was used to estimate daily emissions associated with operation of the fully developed HEU Plan. For informational purposes, the annual GHG emissions resulting from

operation of the HEU Plan, shown in Table 8, is 38,358 MT of CO_2e with natural gas consumption and 33,153 MT of CO_2e without.

Table 8. Annual HEU Plan GHG Emissions (CO_2e) in Metric Tons

Source Category	Proposed New Uses in 2040
Mobile	29,944
Area	61
Energy Consumption	1,729
Energy Consumption from Natural Gas	5,204
Water Usage	162
Solid Waste Generation	1,249
Refrigeration	9
Total (MT CO_{2e}/year) with Natural Gas	38,358
Total (MT CO_{2e}/year) With No Natural Gas	33,153

The primary sources of GHG emissions are from vehicle travel, energy consumption, and solid waste. The modeling results using CalEEMod do not incorporate future regulations that would reduce GHG emissions. For example, CalEEMod results are based on regulations in place in 2020 for on-road vehicles and current emission rates of electricity providers. Under new State laws, these emissions are anticipated to decrease substantially beyond those levels predicted by CalEEMod. However, GHG emissions may increase in the HEU Plan because there will be more residents in the area.

Development of the HEU Plan area would lead to an increase in vehicle emissions due to the increase in land uses and associated vehicle travel. The incorporation of VMT and Transportation Demand Management (TDM) measures are typical ways to reduce mobile emissions.

GHG emissions associated with energy consumption would increase. The level of this increase would depend on whether new projects are constructed all electric or include natural gas appliances.

Solid waste generation is anticipated to increase due to the increased population supported by the HEU Plan. CalEEMod emissions associated with solid waste are likely overestimated as various programs are designed to reduce solid waste and reduce emissions from solid waste transport and land fill. The CalEEMod model does not consider these future reductions in emissions.

To have less-than-significant GHG emissions, the Patterson HEU must meet State's goals to reduce emissions to 40% below 1990 levels by 2030 and carbon neutrality by 2045 (Threshold 1) or be consistent with a local GHG reduction strategy (Threshold 2). Projects within the Patterson HEU must be consistent with a local GHG reduction strategy (Threshold B) or meet the minimum project design elements to show consistency with State Goals (e.g., elements recommended by the Bay Area Air District as Threshold A). The City has not adopted a Climate Action Plan (CAP) that

meets the State CEQA Guidelines Section 15183.5(b). Therefore, the Patterson HEU would be required to meet Threshold A.

To show consistency with the State goals, the Bay Area Air District developed project level thresholds of significance for projects located in jurisdictions where a qualified CAP or GHG reduction strategy is not adopted. Impacts of the Patterson HEU under the Threshold A (see above), are described as follows:

1. Avoid construction of new natural gas connections for the residential building,
   - Projects within the Patterson HEU that propose natural gas infrastructure would be considered to have a *significant impact*. Under the HEU, emissions from natural gas usage could generate 6,069 $MTCO_2e$ per year. Prohibiting natural gas usage from new residences would eliminate these emissions.
2. Avoid wasteful or inefficient use of electricity,
   - Project's constructed under the Patterson HEU would meet CALGreen Building Standards Code requirements that are considered to be energy efficient. In addition, they would be required to meet *Air Quality and Climate Action* policies AR-6.1, 6.2, 7.4, 7.5 and Implementation Measure AR-7.
3. Include electric vehicle charging infrastructure that meets current Building Code CALGreen Tier 2 compliance.
   - Projects within the Patterson HEU Area that do not include sufficient EV parking infrastructure would be considered to have a significant impact.
4. Reduce VMT per service population by 15 percent over regional average.
   - Projects within the Patterson HEU Area that do not screen out or meet the VMT reduction threshold would be considered to have a significant impact. The Vehicle Miles Traveled Impact Analysis found that the HEU Plan would have *significant* impacts with respect to VMT.

Since projects constructed under the Patterson HEU could be approved with natural gas infrastructure, do not include sufficient EV parking infrastructure, and do not screen out or meet the VMT reduction threshold that emits GHG emissions in conflict with the State's goals to reduce GHG emissions, the impact would be considered *significant*.

Mitigation Measure GHG-1: Ensure all new development meet the Bay Area Air District project-level thresholds.

HEU Plan projects shall meet the following measures:

- All new development projects within the HEU Plan would be required to be all electric and not include new natural gas infrastructure or appliances.

- Projects that include natural gas appliances would have to enter into an agreement with the City to reduce GHG emissions equivalent to those emitted by the Project's natural gas appliances. Applicants would have to provide evidence to the City demonstrating that these emissions were properly

identified and offset, prior to receiving any approval for construction (e.g., building permit).

- All new development projects within the HEU Plan would be required to include electric vehicle charging infrastructure that meets current Building Code CALGreen Tier 2 compliance.

- Projects would have to implement or participate in an eligible Transportation Demand Management (TDM) plan.

Effectiveness of Mitigation Measure GHG-1

Although the projects would be required to implement all electric infrastructure and sufficient EV parking infrastructure, the HEU Plan would exceed the VMT thresholds and mitigation measures to achieve the thresholds are not feasible. Therefore, the HEU plan would have a *significant and unavoidable* impact.

Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The proposed HEU Plan area would not conflict or otherwise interfere with the statewide GHG reduction measures identified in CARB's Scoping Plan. The City of Patterson enforces its building codes, which aim to reduce GHG emissions. Therefore, if individual projects conform to City building Codes, they would not conflict with local plans, policies, or regulations applicable to GHG emissions. The proposed projects would be constructed in conformance with at minimum the 2022 CalGreen and the Title 24 Building Codes, which requires high-efficiency water fixtures, water-efficient irrigation systems, and compliance with current energy efficiency standards. Compliance with these standards ensures compliance with State and federal plans, policies, and regulations applicable to GHG emissions.

Supporting Documentation

Attachment 1 includes the CalEEMod output for project operational criteria air pollutants. Also included are any modeling assumptions.

Attachment 1: CalEEMod Input Assumptions and Outputs

Operational Criteria Air Pollutants w Natural Gas					
Unmitigated	ROG	NOX	Total PM10	Total PM2.5	CO
Year	Tons				
Total	48.57	18.04	37.33	9.90	127.63
	Net Annual Operational Emissions				
Tons/year	48.57	18.04	37.33	9.90	127.63
Threshold - Tons/year	**10.0**	**10.0**	**15.0**	**15.0**	**100.0**
	Average Daily Emissions				
Pounds Per Day	266.15	98.84	204.53	54.27	699.33

Category	**CO2e (MT/year)**				
	Project				
Mobile	29,944				
Area	61				
Energy	6,933				
Water	162				
Waste	1,249				
Refrig.	9				
TOTAL	38,358				0.00
Net GHG Emissions		38357.82			0.00

Operational Criteria Air Pollutants W/o Natural Gas					
Unmitigated	ROG	NOX	Total PM10	Total PM2.5	CO
Year	Tons				
Total	48.26	12.78	36.90	9.48	125.39
	Net Annual Operational Emissions				
Tons/year	48.26	12.78	36.90	9.48	125.39
Threshold - Tons/year	**10.0**	**10.0**	**15.0**	**15.0**	**100.0**
	Average Daily Emissions				
Pounds Per Day	264.46	70.04	202.20	51.94	687.07

Category	**CO2e (MT/year)**				
	Project				
Mobile	29,944				
Area	61				
Energy	1,729				
Water	162				
Waste	1,249				
Refrig.	9				
TOTAL	33,153				0.00
Net GHG Emissions		33153.45			0.00

25-122 Patterson Housing Element Update 2040 w natural gas Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	25-122 Patterson Housing Element Update 2040 w natural gas
Operational Year	2040
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.10
Precipitation (days)	29.2
Location	Patterson, CA 95363, USA
County	Stanislaus
City	Patterson
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2207
EDFZ	14
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	2,829	Dwelling Unit	919	5,516,550	33,135,672	—	8,968	—

Apartments Low Rise	2,090	Dwelling Unit	131	2,215,400	0.00	—	6,625	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	288	99.1	991	3.38	217	220	3.29	55.0	58.3	255,912
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	258	106	584	3.25	217	220	3.20	55.0	58.2	237,132
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	266	98.8	699	3.26	201	205	3.19	51.1	54.3	231,683
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	48.6	18.0	128	0.60	36.7	37.3	0.58	9.32	9.90	38,358

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	83.1	67.7	698	0.92	217	218	0.87	55.0	55.9	204,710
Area	203	2.58	280	0.12	—	0.12	0.09	—	0.09	749

Energy	1.69	28.8	12.3	2.33	—	2.33	2.33	—	2.33	41,875
Water	—	—	—	—	—	—	—	—	—	981
Waste	—	—	—	—	—	—	—	—	—	7,541
Refrig.	—	—	—	—	—	—	—	—	—	55.4
Total	288	99.1	991	3.38	217	220	3.29	55.0	58.3	255,912
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	77.7	77.4	572	0.92	217	218	0.87	55.0	55.9	186,680
Area	179	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Energy	1.69	28.8	12.3	2.33	—	2.33	2.33	—	2.33	41,875
Water	—	—	—	—	—	—	—	—	—	981
Waste	—	—	—	—	—	—	—	—	—	7,541
Refrig.	—	—	—	—	—	—	—	—	—	55.4
Total	258	106	584	3.25	217	220	3.20	55.0	58.2	237,132
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	73.8	68.8	549	0.87	201	202	0.82	51.1	51.9	180,861
Area	191	1.27	138	0.06	—	0.06	0.05	—	0.05	369
Energy	1.69	28.8	12.3	2.33	—	2.33	2.33	—	2.33	41,875
Water	—	—	—	—	—	—	—	—	—	981
Waste	—	—	—	—	—	—	—	—	—	7,541
Refrig.	—	—	—	—	—	—	—	—	—	55.4
Total	266	98.8	699	3.26	201	205	3.19	51.1	54.3	231,683
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	13.5	12.6	100	0.16	36.7	36.9	0.15	9.32	9.47	29,944
Area	34.8	0.23	25.2	0.01	—	0.01	0.01	—	0.01	61.1
Energy	0.31	5.26	2.24	0.42	—	0.42	0.42	—	0.42	6,933
Water	—	—	—	—	—	—	—	—	—	162
Waste	—	—	—	—	—	—	—	—	—	1,249
Refrig.	—	—	—	—	—	—	—	—	—	9.17

Total	48.6	18.0	128	0.60	36.7	37.3	0.58	9.32	9.90	38,358

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	51.0	41.6	428	0.57	133	134	0.53	33.7	34.3	125,561
Apartments Low Rise	32.1	26.2	270	0.36	83.8	84.2	0.33	21.3	21.6	79,149
Total	83.1	67.7	698	0.92	217	218	0.87	55.0	55.9	204,710
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	47.7	47.4	351	0.57	133	134	0.53	33.7	34.3	114,502
Apartments Low Rise	30.0	29.9	221	0.36	83.8	84.2	0.34	21.3	21.6	72,178
Total	77.7	77.4	572	0.92	217	218	0.87	55.0	55.9	186,680
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.54	7.96	63.5	0.10	23.3	23.4	0.09	5.91	6.00	18,984
Apartments Low Rise	4.93	4.59	36.7	0.06	13.4	13.5	0.05	3.41	3.47	10,960
Total	13.5	12.6	100	0.16	36.7	36.9	0.15	9.32	9.47	29,944

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	3,768
Apartments Low Rise	—	—	—	—	—	—	—	—	—	1,451
Total	—	—	—	—	—	—	—	—	—	5,219
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	3,768
Apartments Low Rise	—	—	—	—	—	—	—	—	—	1,451
Total	—	—	—	—	—	—	—	—	—	5,219
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	624
Apartments Low Rise	—	—	—	—	—	—	—	—	—	240
Total	—	—	—	—	—	—	—	—	—	864

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.22	20.8	8.84	1.68	—	1.68	1.68	—	1.68	26,448

Apartments Low Rise	0.47	8.02	3.41	0.65	—	0.65	0.65	—	0.65	10,209
Total	1.69	28.8	12.3	2.33	—	2.33	2.33	—	2.33	36,657
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.22	20.8	8.84	1.68	—	1.68	1.68	—	1.68	26,448
Apartments Low Rise	0.47	8.02	3.41	0.65	—	0.65	0.65	—	0.65	10,209
Total	1.69	28.8	12.3	2.33	—	2.33	2.33	—	2.33	36,657
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.22	3.79	1.61	0.31	—	0.31	0.31	—	0.31	4,379
Apartments Low Rise	0.09	1.46	0.62	0.12	—	0.12	0.12	—	0.12	1,690
Total	0.31	5.26	2.24	0.42	—	0.42	0.42	—	0.42	6,069

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Consumer Products	165	—	—	—	—	—	—	—	—	—
Architectural Coatings	13.3	—	—	—	—	—	—	—	—	—
Landscape Equipment	24.2	2.58	280	0.12	—	0.12	0.09	—	0.09	749
Total	203	2.58	280	0.12	—	0.12	0.09	—	0.09	749

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Consumer Products	165	—	—	—	—	—	—	—	—	—
Architectural Coatings	13.3	—	—	—	—	—	—	—	—	—
Total	179	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Consumer Products	30.2	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.42	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.18	0.23	25.2	0.01	—	0.01	0.01	—	0.01	61.1
Total	34.8	0.23	25.2	0.01	—	0.01	0.01	—	0.01	61.1

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	629
Apartments Low Rise	—	—	—	—	—	—	—	—	—	352
Total	—	—	—	—	—	—	—	—	—	981
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	629
Apartments Low Rise	—	—	—	—	—	—	—	—	—	352
Total	—	—	—	—	—	—	—	—	—	981
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	104
Apartments Low Rise	—	—	—	—	—	—	—	—	—	58.3
Total	—	—	—	—	—	—	—	—	—	162

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	4,627
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2,914
Total	—	—	—	—	—	—	—	—	—	7,541
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	4,627
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2,914
Total	—	—	—	—	—	—	—	—	—	7,541
Annual	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	766
Apartments Low Rise	—	—	—	—	—	—	—	—	—	482
Total	—	—	—	—	—	—	—	—	—	1,249

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	39.5
Apartments Low Rise	—	—	—	—	—	—	—	—	—	15.9
Total	—	—	—	—	—	—	—	—	—	55.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	39.5
Apartments Low Rise	—	—	—	—	—	—	—	—	—	15.9
Total	—	—	—	—	—	—	—	—	—	55.4
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	6.54
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2.63
Total	—	—	—	—	—	—	—	—	—	9.17

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	26,706	26,989	24,188	9,631,068	185,872	187,841	168,348	67,032,230
Apartments Low Rise	15,299	17,013	13,125	5,560,087	106,480	118,408	91,351	38,698,205

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	0

Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments Low Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
15657198.75	5,219,066	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	24,119,232	55.0	0.0330	0.0040	82,295,682
Apartments Low Rise	9,289,775	55.0	0.0330	0.0040	31,766,186

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	112,928,659	559,350,138
Apartments Low Rise	83,429,090	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	2,454	—
Apartments Low Rise	1,545	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	22.2	annual days of extreme heat
Extreme Precipitation	1.00	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	27.1	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	70.3
AQ-PM	52.1
AQ-DPM	52.8
Drinking Water	87.4
Lead Risk Housing	34.4
Pesticides	83.3
Toxic Releases	14.4
Traffic	2.79
Effect Indicators	—
CleanUp Sites	43.2
Groundwater	75.4
Haz Waste Facilities/Generators	28.3
Impaired Water Bodies	23.9
Solid Waste	0.00

Sensitive Population	—
Asthma	55.4
Cardio-vascular	74.0
Low Birth Weights	51.3
Socioeconomic Factor Indicators	—
Education	73.2
Housing	19.8
Linguistic	73.7
Poverty	61.5
Unemployment	84.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	41.48594893
Employed	30.10393943
Median HI	42.69215963
Education	—
Bachelor's or higher	20.4029257
High school enrollment	100
Preschool enrollment	52.04670858
Transportation	—
Auto Access	53.75336841
Active commuting	21.0701912
Social	—
2-parent households	30.59155653
Voting	43.57756961

Neighborhood	—
Alcohol availability	75.06736815
Park access	55.65250866
Retail density	29.68048248
Supermarket access	44.27049917
Tree canopy	64.24996792
Housing	—
Homeownership	64.54510458
Housing habitability	66.36725266
Low-inc homeowner severe housing cost burden	53.85602464
Low-inc renter severe housing cost burden	53.72770435
Uncrowded housing	47.26036186
Health Outcomes	—
Insured adults	39.29167201
Arthritis	0.0
Asthma ER Admissions	40.6
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	30.7
Cognitively Disabled	58.3
Physically Disabled	87.9
Heart Attack ER Admissions	13.7
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0

Obesity	0.0
Pedestrian Injuries	39.3
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	4.8
Elderly	81.9
English Speaking	32.9
Foreign-born	40.4
Outdoor Workers	28.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	52.8
Traffic Density	5.7
Traffic Access	0.0
Other Indices	—
Hardship	67.1
Other Decision Support	—
2016 Voting	43.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	67.0

Healthy Places Index Score for Project Location (b)	40.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	PG&E average 2021-2023 annual power content label = 55lb/MWh.
Operations: Fleet Mix	District residential fleet mix for 2040.
Operations: Hearths	No hearths.
Operations: Water and Waste Water	Wastewater treatment 100% aerobic - no septic tanks or lagoons.
Operations: Vehicle Data	Trip lengths = calculated VMT.

25-122 Patterson Housing Element Update 2040 w no natural gas Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	25-122 Patterson Housing Element Update 2040 w no natural gas
Operational Year	2040
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.10
Precipitation (days)	29.2
Location	Patterson, CA 95363, USA
County	Stanislaus
City	Patterson
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2207
EDFZ	14
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	2,829	Dwelling Unit	919	5,516,550	33,135,672	—	8,968	—

Apartments Low Rise	2,090	Dwelling Unit	131	2,215,400	0.00	—	6,625	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	286	70.3	979	1.05	217	218	0.96	55.0	56.0	224,477
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	256	77.4	572	0.92	217	218	0.87	55.0	55.9	205,698
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	264	70.0	687	0.93	201	202	0.87	51.1	51.9	200,249
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	48.3	12.8	125	0.17	36.7	36.9	0.16	9.32	9.48	33,153

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	83.1	67.7	698	0.92	217	218	0.87	55.0	55.9	204,710
Area	203	2.58	280	0.12	—	0.12	0.09	—	0.09	749

Energy	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	10,441
Water	—	—	—	—	—	—	—	—	—	981
Waste	—	—	—	—	—	—	—	—	—	7,541
Refrig.	—	—	—	—	—	—	—	—	—	55.4
Total	286	70.3	979	1.05	217	218	0.96	55.0	56.0	224,477
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	77.7	77.4	572	0.92	217	218	0.87	55.0	55.9	186,680
Area	179	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Energy	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	10,441
Water	—	—	—	—	—	—	—	—	—	981
Waste	—	—	—	—	—	—	—	—	—	7,541
Refrig.	—	—	—	—	—	—	—	—	—	55.4
Total	256	77.4	572	0.92	217	218	0.87	55.0	55.9	205,698
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	73.8	68.8	549	0.87	201	202	0.82	51.1	51.9	180,861
Area	191	1.27	138	0.06	—	0.06	0.05	—	0.05	369
Energy	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	10,441
Water	—	—	—	—	—	—	—	—	—	981
Waste	—	—	—	—	—	—	—	—	—	7,541
Refrig.	—	—	—	—	—	—	—	—	—	55.4
Total	264	70.0	687	0.93	201	202	0.87	51.1	51.9	200,249
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	13.5	12.6	100	0.16	36.7	36.9	0.15	9.32	9.47	29,944
Area	34.8	0.23	25.2	0.01	—	0.01	0.01	—	0.01	61.1
Energy	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	1,729
Water	—	—	—	—	—	—	—	—	—	162
Waste	—	—	—	—	—	—	—	—	—	1,249
Refrig.	—	—	—	—	—	—	—	—	—	9.17

Total	48.3	12.8	125	0.17	36.7	36.9	0.16	9.32	9.48	33,153

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	51.0	41.6	428	0.57	133	134	0.53	33.7	34.3	125,561
Apartments Low Rise	32.1	26.2	270	0.36	83.8	84.2	0.33	21.3	21.6	79,149
Total	83.1	67.7	698	0.92	217	218	0.87	55.0	55.9	204,710
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	47.7	47.4	351	0.57	133	134	0.53	33.7	34.3	114,502
Apartments Low Rise	30.0	29.9	221	0.36	83.8	84.2	0.34	21.3	21.6	72,178
Total	77.7	77.4	572	0.92	217	218	0.87	55.0	55.9	186,680
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.54	7.96	63.5	0.10	23.3	23.4	0.09	5.91	6.00	18,984
Apartments Low Rise	4.93	4.59	36.7	0.06	13.4	13.5	0.05	3.41	3.47	10,960
Total	13.5	12.6	100	0.16	36.7	36.9	0.15	9.32	9.47	29,944

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	7,535
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2,905
Total	—	—	—	—	—	—	—	—	—	10,441
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	7,535
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2,905
Total	—	—	—	—	—	—	—	—	—	10,441
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	1,248
Apartments Low Rise	—	—	—	—	—	—	—	—	—	481
Total	—	—	—	—	—	—	—	—	—	1,729

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00

Apartments Low Rise	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Apartments Low Rise	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Apartments Low Rise	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Consumer Products	165	—	—	—	—	—	—	—	—	—
Architectural Coatings	13.3	—	—	—	—	—	—	—	—	—
Landscape Equipment	24.2	2.58	280	0.12	—	0.12	0.09	—	0.09	749
Total	203	2.58	280	0.12	—	0.12	0.09	—	0.09	749

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Consumer Products	165	—	—	—	—	—	—	—	—	—
Architectural Coatings	13.3	—	—	—	—	—	—	—	—	—
Total	179	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Consumer Products	30.2	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.42	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.18	0.23	25.2	0.01	—	0.01	0.01	—	0.01	61.1
Total	34.8	0.23	25.2	0.01	—	0.01	0.01	—	0.01	61.1

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	629
Apartments Low Rise	—	—	—	—	—	—	—	—	—	352
Total	—	—	—	—	—	—	—	—	—	981
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	629
Apartments Low Rise	—	—	—	—	—	—	—	—	—	352
Total	—	—	—	—	—	—	—	—	—	981
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	104
Apartments Low Rise	—	—	—	—	—	—	—	—	—	58.3
Total	—	—	—	—	—	—	—	—	—	162

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	4,627
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2,914
Total	—	—	—	—	—	—	—	—	—	7,541
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	4,627
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2,914
Total	—	—	—	—	—	—	—	—	—	7,541
Annual	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	766
Apartments Low Rise	—	—	—	—	—	—	—	—	—	482
Total	—	—	—	—	—	—	—	—	—	1,249

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	39.5
Apartments Low Rise	—	—	—	—	—	—	—	—	—	15.9
Total	—	—	—	—	—	—	—	—	—	55.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	39.5
Apartments Low Rise	—	—	—	—	—	—	—	—	—	15.9
Total	—	—	—	—	—	—	—	—	—	55.4
Annual	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	6.54
Apartments Low Rise	—	—	—	—	—	—	—	—	—	2.63
Total	—	—	—	—	—	—	—	—	—	9.17

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	26,706	26,989	24,188	9,631,068	185,872	187,841	168,348	67,032,230
Apartments Low Rise	15,299	17,013	13,125	5,560,087	106,480	118,408	91,351	38,698,205

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	0

Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments Low Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
15657198.75	5,219,066	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	48,237,715	55.0	0.0330	0.0040	0.00
Apartments Low Rise	18,599,525	55.0	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	112,928,659	559,350,138
Apartments Low Rise	83,429,090	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	2,454	—
Apartments Low Rise	1,545	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	22.2	annual days of extreme heat
Extreme Precipitation	1.00	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	27.1	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	70.3
AQ-PM	52.1
AQ-DPM	52.8
Drinking Water	87.4
Lead Risk Housing	34.4
Pesticides	83.3
Toxic Releases	14.4
Traffic	2.79
Effect Indicators	—
CleanUp Sites	43.2
Groundwater	75.4
Haz Waste Facilities/Generators	28.3
Impaired Water Bodies	23.9
Solid Waste	0.00

Sensitive Population	—
Asthma	55.4
Cardio-vascular	74.0
Low Birth Weights	51.3
Socioeconomic Factor Indicators	—
Education	73.2
Housing	19.8
Linguistic	73.7
Poverty	61.5
Unemployment	84.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	41.48594893
Employed	30.10393943
Median HI	42.69215963
Education	—
Bachelor's or higher	20.4029257
High school enrollment	100
Preschool enrollment	52.04670858
Transportation	—
Auto Access	53.75336841
Active commuting	21.0701912
Social	—
2-parent households	30.59155653
Voting	43.57756961

Neighborhood	—
Alcohol availability	75.06736815
Park access	55.65250866
Retail density	29.68048248
Supermarket access	44.27049917
Tree canopy	64.24996792
Housing	—
Homeownership	64.54510458
Housing habitability	66.36725266
Low-inc homeowner severe housing cost burden	53.85602464
Low-inc renter severe housing cost burden	53.72770435
Uncrowded housing	47.26036186
Health Outcomes	—
Insured adults	39.29167201
Arthritis	0.0
Asthma ER Admissions	40.6
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	30.7
Cognitively Disabled	58.3
Physically Disabled	87.9
Heart Attack ER Admissions	13.7
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0

Obesity	0.0
Pedestrian Injuries	39.3
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	4.8
Elderly	81.9
English Speaking	32.9
Foreign-born	40.4
Outdoor Workers	28.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	52.8
Traffic Density	5.7
Traffic Access	0.0
Other Indices	—
Hardship	67.1
Other Decision Support	—
2016 Voting	43.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	67.0

Healthy Places Index Score for Project Location (b)	40.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	PG&E 2021-2023 average annual power content label = 55 lb/MWh.
Operations: Fleet Mix	District residential fleet mix for 2040.
Operations: Hearths	No hearths.
Operations: Water and Waste Water	Wastewater treatment 100% aerobic - no septic tanks or lagoons.
Operations: Vehicle Data	Trip lengths = calculated VMT.
Operations: Energy Use	No natural gas. Convert natural gas to electricity.

Special-Status Species in the Vicinity of the Housing Sites

APPENDIX D

Appendix D

Table 1 Special-Status Plant Species with the Potential to Occur in the Project Vicinity

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Alkali milk-vetch *(Astragalus tener* var. *tener)*	--/--/1B.2	Alkaline sites in playas, valley and foothill grassland (on adobe clay), and vernal pools; elevation 1-60m. Blooming Period: March - June.	Unlikely. Suitable undisturbed alkaline habitats not found within proposed housing sites.
Alkali-sink goldfields (*Lasthenia chrysantha*)	--/--/1B.1	Vernal pools. Alkaline; elevation 0-200m.	Unlikely. Suitable undisturbed vernal pool or alkaline habitats not found within proposed housing sites.
Big tarplant *(Blepharizonia plumosa)*	--/--/1B.1	Valley and foothill grassland. Dry hills and plains in annual grassland. Clay to clay-loam soils, usually on slopes and often in burned areas; elevation 15-445m. Blooming Period: July - October.	Low. Suitable dry annual grassland habitats found within proposed housing sites 4, 5, 6, 7, 10, 12, 13, 15.
Broadleaf pondweed *(Stuckenia striata)*	--/--/2B.3	Marshes and swamps. Lakes, ponds, rivers, and drainage canals; elevation -70-2135m. Blooming period: July - August	Unlikely. Suitable vegetated aquatic habitats or drainage canals not found within proposed housing sites.
California alkali grass *(Puccinellia simplex)*	--/--/1B.2	Meadows and seeps, chenopod scrub, valley and foothill grasslands, vernal pools. Alkaline, vernally mesic. Sinks, flats, and lake margins; elevation 1-915m. Blooming Period: March - May.	Unlikely. Suitable undisturbed aquatic or alkaline habitats not found within proposed housing sites.
Chaparral harebell *(Campanula exigua)*	--/--/1B.2	Chaparral (rocky, usually serpentine); elevation 275-1250m. Blooming Period: May - June	Unlikely. Suitable undisturbed chaparral habitats not found within proposed housing sites.
Delta button-celery *(Eryngium racemosum)*	--/SE/1B.1	Riparian scrub; prefers seasonally inundated floodplain on clay soils; elevation 3-75m. Blooming Period: June - August.	Unlikely. Suitable undisturbed riparian scrub habitats not found within proposed housing sites.
Diamond-petaled California poppy *(Eschscholzia rhombipetala)*	--/--/1B.1	Valley and foothill grassland. Alkaline, clay slopes and flats; elevation 0-97m. Blooming Period: March - April.	Unlikely. Suitable undisturbed alkaline grassland habitats not found within proposed housing sites.

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Hall's bush-mallow *(Malacothamnus hallii)*	--/--/1B.2	Chaparral, some populations on serpentine; elevation 10-550m. Blooming Period: May - September	Unlikely. Suitable undisturbed chaparral habitats not found within proposed housing sites.
Heartscale *(Atriplex cordulata* var. *cordulata)*	--/--/1B.2	Chenopod scrub, valley and foothill grassland, and meadows. Prefers alkaline flats and scalds in the Central Valley, on sandy soils; elevation 1-150m. Blooming Period: April - October.	Unlikely. Suitable undisturbed alkaline scrub or grassland habitats not found within proposed housing sites.
Hispid's salty bird's-beak *(Chloropyron molle* ssp. *hispidum)*	--/--/1B.1	Meadows, playas, valley and foothill grassland. In damp alkaline soils, especially in alkaline meadows and alkali sinks with *Distichlis* sp.; elevation 10-155m. Blooming Period: June - September.	Unlikely. Suitable undisturbed alkaline meadow or grassland habitats not found within proposed housing sites.
Lemmon's jewel-flower *(Caulanthus lemmonii)*	--/--/1B.2	Pinyon-juniper woodland, valley and foothill grassland; elevation 80-1220m. Blooming Period: March - May.	Unlikely. Suitable undisturbed pinyon-juniper habitats not found within proposed housing sites.
Lesser saltscale *(Atriplex minuscula)*	--/--/1B.1	Chenopod scrub, playas, and valley and foothill grassland. In alkali sinks in sandy, alkaline soils; elevation 20-100m. Blooming Period: May - October.	Unlikely. Suitable undisturbed alkaline scrub or grassland habitats not found within proposed housing sites.
Mt. Diablo phacelia *(Phacelia phacelioides)*	--/--/1B.2	Rocky sites in chaparral and cismontane woodland; elevation 500-1370m. Blooming Period: April - May	Unlikely. Suitable undisturbed chaparral or cismontane woodland habitats not found within proposed housing sites.
Mt. Hamilton coreopsis *(Leptosyne hamiltonii)*	--/--/1B.2	Rocky sites in cismontane woodland; prefers steep shale talus with open southwestern exposure; elevation 550-1300m. Blooming Period: March - May	Unlikely. Suitable undisturbed cismontane woodland habitats not found within proposed housing sites.
Prairie wedge grass *(Sphenopholis obtusata)*	--/--/2B.2	Cismontane woodland, meadows and seeps. Open moist sites, along rivers and springs, alkaline desert seeps; elevation 15-2625m. Blooming Period: April - July	Unlikely. Suitable undisturbed cismontane woodland or mesic habitats not found within proposed housing sites.
Prostrate vernal pool navarretia *(Navarretia prostrata)*	--/--/1B.1	Coastal scrub, valley and foothill grassland, and vernal pools. Alkaline soils in grassland, or in vernal pools; elevation 15-700m. Blooming Period: April - July.	Unlikely. Suitable undisturbed alkaline grassland or vernal pool habitats not found within proposed housing sites.
Red-flowered bird's-foot trefoil *(Acmispon rubriflorus)*	--/--/1B.1	Valley and foothill grassland, cismontane woodland. Most recent sighting from sterile, red soils - volcanic mudflow deposits; elevation 195-490m. Blooming Period: April - June	Unlikely. Suitable undisturbed grassland or cismontane woodland habitats not found within proposed housing sites.

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
San Joaquin spearscale *(Extriplex joaquinana)*	--/--/1B.2	Alkaline sites in chenopod scrub, meadows and seeps, playas, and valley and foothill grassland; elevation 1-320m. Blooming Period: April - October.	Unlikely. Suitable undisturbed alkaline habitats not found within proposed housing sites.
Sanford's arrowhead *(Sagittaria sanfordii)*	--/--/1B.2	Marshes and swamps. Found in standing or slow-moving freshwater ponds, marshes, and ditches; elevation 0-610m. Blooming Period: May - October.	Unlikely. Suitable undisturbed aquatic habitats not found within proposed housing sites.
Shining navarretia *(Navarretia nigelliformis* ssp. *radians)*	--/--/1B.2	Cismontane woodland, valley and foothill grassland, and vernal pools; elevation 200-1000m. Blooming Period: May - July.	Unlikely. Suitable undisturbed cismontane woodland, grassland or vernal pool habitats not found within proposed housing sites.
Showy golden madia *(Madia radiata)*	--/--/1B.1	Valley and foothill grassland, cismontane woodland, and chenopod scrub. Mostly on adobe clay in grassland or among shrubs; elevation 25-1125m. Blooming Period: March - May	Unlikely. Suitable undisturbed cismontane woodland, grassland or scrub habitats not found within proposed housing sites.
Spiny-sepaled button-celery *(Eryngium spinosepalum)*	--/--/1B.2	Vernal pools within valley and foothill grassland. Some sites on clay soils of granitic origin; elevation 100-420m. Blooming Period: April - May.	Unlikely. Suitable undisturbed vernal pool or grassland habitats not found within proposed housing sites.
Subtle orache *(Atriplex subtilis)*	--/--/1B.2	Alkaline sites in valley and foothill grassland; elevation 40-100m. Blooming Period: August - October	Unlikely. Suitable undisturbed alkaline habitats not found within proposed housing sites.
Talus fritillary *(Fritillaria falcifolium)*	--/--/1B.2	Chaparral, cismontane woodland, lower montane coniferous forest. Mostly on serpentine talus, but occasionally found on granitics; elevation 425-1435m. Blooming Period: March - May	Unlikely. Suitable undisturbed chaparral, cismontane woodland, or lower montane coniferous forest habitats not found within proposed housing sites.
Tracys' eriastrum *(Eriastrum tracyi)*	--/--/1B.2	Chaparral, cismontane woodland. Gravelly shale or clay, often in open areas; elevation 315-760m. Blooming Period: June - July	Unlikely. Suitable undisturbed chaparral or cismontane woodland habitats not found within proposed housing sites.
Vernal pool smallscale *(Atriplex persistens)*	--/--/1B.2	Vernal pools on alkaline soils; elevation 10-115m. Blooming Period: July - October.	Unlikely. Suitable undisturbed alkaline vernal pool habitats not found within proposed housing sites.
Wright's trichocoronis *(Trichocoronis wrightii* var. *wrightii)*	--/--/2B.1	Marshes and swamps, riparian forest, meadows and seeps, vernal pools. Mud flats of vernal lakes, drying river beds, alkali meadows; elevation 5-435m. Blooming Period: May – September.	Unlikely. Suitable undisturbed mesic or alkaline habitats not found within proposed housing sites.

SOURCE: CDFW 2025, CNPS 2025, USFWS 2025
NOTE: Status Codes:
Federal (USFWS)
FE: Listed as Endangered under the Federal Endangered Species Act.
FT: Listed as Threatened under the Federal Endangered Species Act.
FC: A Candidate for listing as Threatened or Endangered under the Federal Endangered Species Act.
FSC: Species of Special Concern.
FD: Delisted under the Federal Endangered Species Act.

State (CDFW)
SE: Listed as Endangered under the California Endangered Species Act.
ST: Listed as Threatened under the California Endangered Species Act.
SR: Listed as Rare under the California Endangered Species Act.
SC: A Candidate for listing as Threatened or Endangered under the California Endangered Species Act.
SSC: Species of Special Concern.
SFP: Fully Protected species under the California Fish and Game Code.
SD: Delisted under the California Endangered Species Act.

CNPS Rare Plant Ranks and Threat Code Extensions
1B: Plants that are considered Rare, Threatened, or Endangered in California and elsewhere.
2B: Plants that are considered Rare, Threatened, or Endangered in California, but more common elsewhere.
.1: Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat).
.2: Fairly endangered in California (20-80% occurrences threatened).
.3: Not very endangered in California (<20% of occurrences threatened or no current threats known).

Potential to Occur
Present: Observed during field surveys, known occurrence of species within the site
High: Known occurrence of species in the vicinity from the CNDDB or other records; presence of suitable habitat conditions
Moderate: Known occurrence of species in the vicinity from the CNDDB or other records; presence of marginal habitat conditions
Low: Species known to occur in the vicinity from the CNDDB or other records; presence of low quality habitat conditions
Unlikely: Species not known to occur in the vicinity from the CNDDB or other documentation; no suitable habitat is present
Not Present: Species not observed during surveys

Table 2 Special-Status Wildlife Species with the Potential to Occur in the Project Vicinity

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
American badger *(Taxidea taxus)*	--/SSC	Most abundant in drier, open stages of most shrub, forest, and herbaceous habitats. Need sufficient food and open, uncultivated ground with friable soils to dig burrows. Prey on burrowing rodents.	Unlikely. Suitable undisturbed open shrub, forest or grassland habitats not found within proposed housing sites.
Bald eagle *(Haliaeetus leucocephalus)*	FD/SE	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within one mile of water. Nests in large, old-growth, or dominant live tree with open branches.	Unlikely. Suitable ocean shore, lake margins, or river habitats not found within vicinity of proposed housing sites.
Burrowing owl *(Athene cunicularia)*	--/SSC	Open, dry, annual or perennial grasslands, desert, or scrubland, with available small mammal burrows.	Low. Species known to occur within the vicinity of the proposed housing sites. Suitable habitat potentially present within sites 4, 5, 6, 7, 9, 10, 12, 13, 15.
Cackling (=Aleutian Canada) goose *(Branta hutchinsii leucopareia)*	DL/WL	Winters on lakes and inland prairies. Forages on natural pasture or that cultivated to grain; loafs on lakes, reservoirs, ponds.	Unlikely. Suitable lakes and inland prairies habitats not found within vicinity of proposed housing sites.
California horned lark *(Eremophila alpestris actia)*	--/SSC	Coastal regions, chiefly from Sonoma County to San Diego County, also within the main part of the San Joaquin Valley and east to the foothills. Prefers short-grass prairie, mountain meadows, open coastal plains, fallow grain fields, alkali flats.	Low. Species known to occur within the vicinity of the proposed housing sites. Suitable habitat potentially present within sites 4, 5, 6, 7, 9, 10, 12, 13, 15.
California linderiella *(Linderiella occidentalis)*	FSC/--	Seasonal pools in unplowed grasslands with old alluvial soils underlain by hardpan or in sandstone depressions. Water in the pools typically has very low alkalinity, conductivity, and total dissolved solids.	Unlikely. Suitable seasonal pool habitats not found within vicinity of proposed housing sites.
California red-legged frog *(Rana draytonii)*	FT/SSC	Rivers, creeks, and stock ponds with pools and overhanging vegetation. Requires dense, shrubby or emergent riparian vegetation, and prefers short riffles and pools with slow-moving, well-oxygenated water. Needs upland habitat to aestivate (remain dormant during dry months) in small mammal burrows, cracks in the soil, or moist leaf litter.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.
California tiger salamander *(Ambystoma californiense)*	FT/ST	Grasslands and oak woodlands near seasonal pools and stock ponds in central and coastal California. Needs upland habitat to aestivate (remain dormant during dry months) in small mammal burrows, cracks in the soil, or moist leaf litter. Requires seasonal water sources that persist into late March for breeding habitat.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Central California roach *(Hesperoleucus symmetricus symmetricus)*	--/SSC	Generally found in small streams of the Sierra Nevada foothills flowing into the Central Valley and are particularly well adapted to life in intermittent watercourses; dense populations are frequently observed in isolated pools. Rarely above 1,000m in elevation. Tolerant of wide temperature ranges and dissolved oxygen levels. Most abundant when only species present, occupying large pools in open water. With other fish, found in shallow margins, pool edges, or dense cover.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites
Conservancy fairy shrimp *(Branchinecta conservatio)*	FE/--	Endemic to the grasslands of the northern two-thirds of the central valley; found in large, turbid pools. Also occurs in swales formed by old, braided alluvium filled by winter/spring rains.	Unlikely. Suitable vernal pool habitats not found within vicinity of proposed housing sites.
Crotch's bumble bee *(Bombus crotchii)*	--/SCE	Open grassland and scrub habitats. Require flowering plants and suitable nesting sites. Documented food plants include *Asclepias* sp., *Chaenactis* sp., *Lupinus* sp., *Medicago* sp., *Phacelia* sp., and *Salvia* sp.	Low. Species known to occur within the vicinity of the proposed housing sites. Suitable habitat potentially present within sites 4, 5, 6, 7, 9, 10, 12, 13, 15.
Foothill yellow-legged frog *(Rana boylii)*	--/SSC	Partly shaded, shallow streams and riffles with rocky substrate in a variety of habitats. Requires at least some cobble-sized substrate for egg-laying and 15 weeks of available water to attain metamorphosis.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.
Giant garter snake *(Thamnophis gigas)*	FT/ ST	Prefers freshwater marsh and low gradient streams. Adapted to drainage canals and irrigation ditches. The most aquatic garter snake in California.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.
Golden eagle *(Aquila chrysaetos)*	--/SFP	Rolling foothill mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range. Also uses large trees in open areas.	Unlikely. Suitable rolling foothill mountain areas, sage-juniper flats, or desert habitats not found within vicinity of proposed housing sites.
Green sturgeon *(Acipenser medirostris)*	FT/SSC	Spawning site fidelity. Spawns in the Sacramento, Feather, and Yuba Rivers. Presence in upper Stanislaus and San Joaquin Rivers may indicate spawning. Non-spawning adults occupy marine/estuarine waters. Delta estuary is important for rearing juveniles. Spawning occurs primarily in cool (11-15 C) sections of mainstem rivers in deep pools (8-9m) with substrate containing small to medium sized sand, gravel, cobble, or boulder.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.
Hardhead *(Mylopharodon conocephalus)*	--/SSC	Low to mid-elevation streams in the Sacramento-San Joaquin drainage. Also present in the Russian River. Clear, deep pools with sand-gravel-boulder bottoms and slow water velocity.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Hoary bat *(Lasiurus cinereus)*	--/SSC	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.	Low. Species known to occur within the vicinity of the proposed housing sites.
Least Bell's vireo *(Vireo bellii pusillus)*	FE/SE	Summer resident of southern and central California in riparian habitats below 2,000 feet in elevation. Often nests in large shrubs, along margins of bushes or on twigs projecting into pathways.	Unlikely. Suitable riparian habitats not found within vicinity of proposed housing sites.
Loggerhead shrike *(Lanius ludovicianus)*	--/SSC	(Nesting) Broken woodlands, savannah, pinyon-juniper, Joshua tree and riparian woodlands, desert oases, scrub and washes. Prefers open country for hunting, with perches for scanning and fairly dense shrubs and brush for nesting.	Unlikely. Suitable undisturbed woodland or scrub habitats not found within vicinity of proposed housing sites.
Long-horn fairy shrimp *(Branchinecta longiantenna)*	FE/--	Endemic to the eastern margin of the Central Coast mountains in seasonally astatic grassland vernal pools. Inhabits small, clear-water depressions in sandstone and clear to turbid clay/grass-bottomed pools in shallow swales.	Unlikely. Suitable vernal pool habitats not found within vicinity of proposed housing sites.
Northern California legless lizard *(Anniella pulchra)*	--/SSC	Sandy or loose loamy soils under sparse vegetation, moist soils. *Anniella pulchra* is traditionally split into two subspecies: *A. pulchra pulchra* (silvery legless lizard) and *A. pulchra nigra* (black legless lizard), but these subspecies are typically no longer recognized.	Unlikely. Suitable undisturbed areas with sparse vegetation and loose soils not found within vicinity of proposed housing sites.
Northwestern pond turtle *(Actinemys marmorata)*	FCT/SSC	Associated with permanent or nearly permanent water in a wide variety of habitats. Requires basking sites. Nest sites may be found up to 0.5 km from water.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.
Pallid bat *(Antrozous pallidus)*	--/SSC	Deserts, grasslands, scrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures.	Low. Species known to occur within the vicinity of the proposed housing sites.
Prairie falcon *(Falco mexicanus)*	--/WL	Nesting Habitats. Open terrain, either level or hilly breeding sites located on cliffs. Forages far distances, including to marshlands and ocean shores.	Unlikely. Suitable habitat for nesting not found within vicinity of proposed housing sites.
Riparian (=San Joaquin Valley) woodrat *(Neotoma fuscipes riparia)*	FE/SSC	Riparian areas along the San Joaquin, Stanislaus, and Tuolumne Rivers. Need areas with mix of brush and trees. Need suitable nesting sites in trees, snags, or logs.	Unlikely. Suitable riparian habitats not found within vicinity of proposed housing sites.
Riparian brush rabbit *(Sylvilagus bachmani riparius)*	FE/SE	Riparian areas on the San Joaquin River in northern Stanislaus County. Dense thickets of wild rose, willows, and blackberries.	Unlikely. Suitable riparian habitats not found within vicinity of proposed housing sites.

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Sacramento splittail *(Pogonichthys macrolepidotus)*	--/SSC	Endemic to the lakes and rivers of the Central Valley, but now confined to the Delta, Suisun Bay, and associated marshes. Slow moving river sectins, dead end sloughs, requires flooded vegetation for spawning and foraging for young.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.
San Joaquin coachwhip *(Masticophis flagellum ruddocki)*	--/SSC	Open, dry habitats with little or no tree cover. Found in valley grassland and saltbush scrub in the San Joaquin Valley. Requires mammal burrows for refuge and oviposition sites.	Unlikely. Suitable grassland or saltbush habitats not found within vicinity of proposed housing sites.
San Joaquin kit fox *(Vulpes macrotis mutica)*	FE/ST	Annual grasslands or grassy open stages with scattered shrubby vegetation. Needs loose-textured sandy soils for burrowing, and suitable prey base.	Low. Species known to occur within the vicinity of the proposed housing sites.
Song sparrow ("Modesto" population) *(Melospiza melodia)*	--/SSC	Central lower basin of Great Valley, from Colusa County south to Stanislaus County and east of Suisun Marshes. Breeds chiefly below 200 feet elevation. Freshwater marshes, riparian thickets, sparsely vegetated irrigation canals, and valley oak restoration sites. Cover consists of willow and nettle thickets, growths of tules and cattails, and riparian oak forests with sufficient understory of blackberry.	Unlikely. Suitable marsh or riparian habitats not found within vicinity of proposed housing sites.
Steelhead *(Oncorhynchus mykiss irideus)*	FT/--	Coastal stream with clean spawning gravel. Requires cool water and pools. Needs migratory access between natal stream and ocean.	Unlikely. Suitable aquatic habitats not found within vicinity of proposed housing sites.
Swainson's hawk *(Buteo swainsoni)*	--/ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas, such as grasslands or agricultural fields supporting rodent populations.	Moderate. Species known to occur within the vicinity of the project site. May nest in trees and forage within agricultural areas or annual grassland.
Townsend's big-eared bat *(Corynorhinus townsendii)*	--/SSC	Inhabits a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Low. Species known to occur within the vicinity of the proposed housing sites.
Tricolored blackbird *(Agelaius tricolor)*	--/SE	Areas adjacent to open water with protected nesting substrate, which typically consists of dense, emergent freshwater marsh vegetation.	Unlikely. Suitable freshwater marsh habitats not found within vicinity of proposed housing sites. Although habitat is not expected to occur, preconstruction surveys are required for housing sites 1A, 1B, and 2 per the Master Plan EIR.

Species	Status (Federal/State/ CNPS)	Suitable Habitat Description	Potential to Occur on the Project Site
Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT/--	Occurs only in the Central Valley of California, in association with blue elderberry (*Sambucus mexicana*). Prefers to lay eggs in elderberries 2-8 inches in diameter; some preference shown for "stressed" elderberries.	Unlikely. Suitable habitats supporting blue elderberries not found within vicinity of proposed housing sites.
Vernal pool fairy shrimp *(Branchinecta lynchi)*	FT/--	Endemic to the grasslands of the Central Valley, Central Coast Mtns., and South Coast Mtns. in astatic rain-filled pools. Inhabits small, clear-water sandstone depression pools and grass swale, earth slump, or basalt-flow depression pools.	Unlikely. Suitable vernal pool habitats not found within vicinity of proposed housing sites.
Vernal pool tadpole shrimp *(Lepidurus packardi)*	FE/--	Inhabits vernal pools and swales in the Sacramento Valley containing clear to highly turbid water. Pools commonly found in swales of unplowed grasslands.	Unlikely. Suitable vernal pool habitats not found within vicinity of proposed housing sites.
Western red bat *(Lasiurus blossevillii)*	--/SSC	Roosts primarily in trees, 2-40 feet above the ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Low. Species known to occur within the vicinity of the proposed housing sites.
Western spadefoot *(Spea hammondii)*	--/SSC	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands, breeds in winter and spring (January - May) in quiet streams and temporary pools.	Unlikely. Suitable undisturbed grassland habitats adjacent to streams or temporary pools not found within vicinity of proposed housing sites.

SOURCE: CDFW 2025, USFWS 2025
NOTE: Status Codes:
Federal (USFWS)
FE: Listed as Endangered under the Federal Endangered Species Act.
FT: Listed as Threatened under the Federal Endangered Species Act.
FC: A Candidate for listing as Threatened or Endangered under the Federal Endangered Species Act.
FSC: Species of Special Concern.
FD: Delisted under the Federal Endangered Species Act.

State (CDFW)
SE: Listed as Endangered under the California Endangered Species Act.
ST: Listed as Threatened under the California Endangered Species Act.
SR: Listed as Rare under the California Endangered Species Act.
SC: A Candidate for listing as Threatened or Endangered under the California Endangered Species Act.
SSC: Species of Special Concern.
SFP: Fully Protected species under the California Fish and Game Code.
SD: Delisted under the California Endangered Species Act.

Potential to Occur
Present: Observed during field surveys, known occurrence of species within the site
High: Known occurrence of species in the vicinity from the CNDDB or other records; presence of suitable habitat conditions
Moderate: Known occurrence of species in the vicinity from the CNDDB or other records; presence of marginal habitat conditions
Low: Species known to occur in the vicinity from the CNDDB or other records; presence of low quality habitat conditions
Unlikely: Species not known to occur in the vicinity from the CNDDB or other documentation; no suitable habitat is present
Not Present: Species not observed during surveys

City of Patterson Housing Element
Vehicle Miles Traveled Impact Assessment Memorandum
(Kittelson & Associates, Inc.)

E

APPENDIX

KITTELSON & ASSOCIATES
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TECHNICAL MEMORANDUM

September 16, 2025 Project# 31409

To: Kylie Pope, Associate Planner
EMC Planning Group
601 Abrego Street
Monterey, CA 93940

From: Anusha Musunuru, Damian Stefanakis, Andy Han; Kittelson & Associates, Inc.

RE: **City of Patterson Housing Element - Vehicle Miles Traveled (VMT) Impact Assessment Memorandum DRAFT**

Introduction

Kittelson and Associates (Kittelson) has prepared this vehicle miles traveled (VMT) impact assessment for the 2025 City of Patterson Housing Element Update. This VMT assessment is based on the City's assigned 2023-2031 Regional Housing Needs Allocation (RHNA) of 3,716 housing units and the Housing Element Site Inventory, which identifies capacity for 4,920 housing units. Kittelson conducted the travel demand modeling to extract VMT using the Stanislaus Council of Governments (Stan COG) Model. The VMT assessment is based on the SB 743 requirements and Governor's Office of Planning and Research (OPR) VMT Guidelines (recently renamed as the Office of Land Use and Climate Innovation). For comparison, MCAG (Merced County), the adjacent county and agency, has adopted VMT Guidelines that follow the OPR recommendations, therefore this assessment is consistent with both guidelines.

The 2023-2031 Draft Housing Element update estimates include a total of 4,920 units located in the sites inventory within traffic analysis zones (TAZs) around the City. Travel forecasts were prepared for both existing 2024 model year and future 2031 cumulative model year conditions. VMT results were extracted at the citywide level based on the efficiency metric, VMT per Capita and total VMT. The results were compared to the Stanislaus County average to determine if the additional housing units as per the Housing Element Update contribute to a VMT impact under SB 743 and OPR guidelines.

The overall effect of adding 4,920 housing units in Patterson in the locations identified by the TAZs in the city and region level VMT is to shorten trip lengths, promote mode choice to transit-related modes and reduce VMT per capita for the City under both 2024 plus project and 2031 plus cumulative project conditions. Kittelson evaluated the Housing Element Update at the programmatic level using an overall systemwide VMT assessment, i.e., considering all the TAZs within the city for evaluating the VMT impacts.

VMT THRESHOLDS

VMT thresholds are defined using recommendations from the California Office of Planning and Research based on their final report, dated December 2018. Cities and counties could opt to develop their own methods, but CEQA impact criteria are generally consistent with OPR recommendations. Since the City of

Patterson did not adopt any VMT thresholds or guidelines, this CEQA analysis is based on the OPR recommendations.

Based on OPR guidelines, any development that does not immediately screen out for a VMT per capita assessment should produce a VMT per capita of 15% less than the baseline regionwide average, in this case, the region is Stanislaus County.

According to OPR, the screening criteria for CEQA Exemptions include the following for housing projects:

1. Projects that generate or attract fewer than 110 trips per day,
2. Within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor, which has 15-minute frequency fixed-route bus service,
3. Contains 100% affordable housing, and,
4. All projects located in the low VMT areas, in a TAZ that has the household VMT per capita that is 15% lower than the baseline regional average.

The Housing Element does not qualify for exemption based on these screening criteria, so a detailed VMT analysis was conducted.

VMT Results

For Patterson, VMT metrics are compared to the Stanislaus County average, and an impact is assessed if the project VMT per capita is higher than the established 15% below the regionwide average threshold. At the aggregate level, **Table 1** and **Table 2** indicate that the Housing Element Update project's overall VMT per capita produces higher VMT than 15% below the regionwide average (15.42 vs 8.41 in 2024, 16.65 vs 8.67 in 2031), and in aggregate would result in a **significant and unavoidable impact** and therefore does not screen out from VMT analysis and evaluation under CEQA.

Tables and figures of the VMT analysis are summarized below.

- Table 1 provides a summary of 2024 VMT per capita at the City and County level.
- Table 2 provides a summary of 2031 VMT per capita at the City and County level.

Table 1: 2024 City and County VMT per capita

Scenario	Households	Population	VMT	VMT/capita	15% Below
2024 No-Project					
City	7,030	24,222	351,715	**14.52**	
County	189,269	585,764	5,710,725	9.75	8.29
2024 Plus Project					
City	11,950	39,829	614,251	**15.42**	
County	194,189	601,371	5,952,019	9.90	8.41

SOURCE: KITTELSON & ASSOCIATES, INC., 2025
NOTE: NET CHANGE IN METRICS IS ASSOCIATED WITH HOUSING ELEMENT UPDATE
2024 PLUS PROJECT VMT IS GREATER THAN 15% BELOW COUNTYWIDE AVERAGE
BOLD AND SHADED DENOTES AN IMPACT

Table 2: 2031 City and County VMT per capita

Scenario	Households	Population	VMT	VMT/capita	15% Below
2031 No-Project					
City	7,503	25,326	378,588	**14.95**	
County	201,830	612,561	6,136,167	10.02	8.51
2031 Plus Project					
City	12,422	40,933	681,566	**16.65**	
County	206,749	628,168	6,403,701	10.19	8.67

SOURCE: KITTELSON & ASSOCIATES, INC., 2025
NOTE: NET CHANGE IN METRICS IS ASSOCIATED WITH HOUSING ELEMENT UPDATE
2031 PLUS PROJECT VMT IS GREATER THAN 15% BELOW COUNTYWIDE AVERAGE
BOLD AND SHADED DENOTES AN IMPACT

Comment Letters on Original Notice of Preparation (NOP)

F

APPENDIX

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

December 8, 2025

Denise Melo
City of Patterson
Community Development Department
P.O Box 667
Patterson, CA 95363

Project: Notice of Preparation/Initial Study of an Environmental Impact Report for City of Patterson 2023-2031 6th Cycle Housing Element

District CEQA Reference No: 20251350

Dear Ms. Melo:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Notice of Preparation and Initial Study (NOP/IS) from the City of Patterson (City) for the Housing Element Update (Housing Element). Per the NOP/IS, the project consists of an update of the City's 2015-2023 Housing Element to the 2023-2031 6th Cycle Housing Element by increasing the proposed development of housing units from 3,716 units to 4,919 units, an increase of 1,548 units in the City of Patterson, CA (Project).

The Project is a plan level project and, while project-specific data may not be available until specific approvals are being granted, the Environmental Impact Report (EIR) should include a discussion of policies, which when implemented, will reduce or mitigate impacts on air quality at the individual project level.

The District offers the following comments at this time regarding the Project:

1) Land Use Planning

Nearly all development projects within the San Joaquin Valley Air Basin, from Housing Element to individual projects have the potential to generate air pollutants, making it more difficult to attain state and federal ambient air quality standards. Land use decisions are critical to improving air quality within the San Joaquin Valley Air Basin because land use patterns greatly influence transportation needs, and motor vehicle emissions are the largest source of air pollution in the Valley. Land use decisions and project design elements such as preventing urban sprawl, encouraging mix-use development, and project design elements that reduce vehicle

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miles traveled (VMT) have proven to be beneficial for air quality. The District recommends that the EIR incorporate strategies that reduce VMTs and require the cleanest available heavy duty trucks, vehicles, and off-road equipment, including zero and near-zero technologies. VMTs can be reduced through encouragement of mix-use development, walkable communities, etc. Additional design element options can be found at:
https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf

In addition, the District recommends that the EIR incorporate strategies that will advance implementation of the best practices listed in Tables 5 and 6 of California Air Resource Board's (CARB's) Freight Handbook Concept Paper, to the extent feasible. This document compiles best practices designed to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities. The concept paper is available at:
https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf

2) Future Development Project Related Emissions

At the federal level under the National Ambient Air Quality Standards (NAAQS), the District is designated as extreme nonattainment for the 8-hour ozone standards and serious nonattainment for the particulate matter less than 2.5 microns in size (PM2.5) standards. At the state level under California Ambient Air Quality Standards (CAAQS), the District is designated as nonattainment for the 8-hour ozone, PM10, and PM2.5 standards.

Per the Housing Element, it is anticipated there will be the need for building 4,919 new housing units from current projections. As such, the District recommends that the Housing Element stipulate that future development projects identify and characterize project construction and operational air emissions. The District recommends the air emissions be compared to the District significance thresholds as identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: https://www.valleyair.org/transportation/GAMAQI.pdf. The District recommends that future development projects be mitigated to the extent feasible, and that future development projects with air emissions above the aforementioned thresholds be mitigated to below these thresholds.

As such, the Housing Element should incorporate where appropriate, a discussion of policies, which when implemented, will require assessment and characterization of project-level emissions, and subsequently require mitigation of air quality impacts to the extent feasible at the individual project-specific level.

Environmental reviews of potential impacts on air quality should incorporate the following items:

2a) Construction Emissions

The District recommends, to reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment.

2b) Operational Emissions

Operational (ongoing) air emissions from mobile sources and stationary sources should be analyzed separately. For reference, the District's significance thresholds are identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf.

Recommended Mitigation Measure: At a minimum, project related impacts on air quality should be reduced to levels below the District's significance thresholds through incorporation of design elements such as the use of cleaner Heavy Heavy-Duty (HHD) trucks and vehicles, measures that reduce Vehicle Miles Traveled (VMTs), and measures that increase energy efficiency. More information on transportation mitigation measures can be found at: https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf

2c) Recommended Model for Quantifying Air Emissions

Project-related criteria pollutant emissions from construction and operational sources should be identified and quantified. Emissions analysis should be performed using the California Emission Estimator Model (CalEEMod), which uses the most recent CARB-approved version of relevant emissions models and emission factors. CalEEMod is available to the public and can be downloaded from the CalEEMod website at: www.caleemod.com.

3) Health Risk Screening/Assessment for Future Development Projects

For future development projects, the City should evaluate the risk associated with the Project for sensitive receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) in the area and mitigate any potentially significant risk to help limit exposure of sensitive receptors to emissions.

To determine potential health impacts on surrounding receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) a Prioritization and/or a Health Risk Assessment (HRA) should be performed for future development projects that may be approved under implementation of the Housing

Element. These health risk determinations should quantify and characterize potential Toxic Air Contaminants (TACs) identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health.

Health risk analyses should include all potential air emissions from the project, which include emissions from construction of the project, including multi-year construction, as well as ongoing operational activities of the project. Note, two common sources of TACs can be attributed to diesel exhaust emitted from heavy-duty off-road earth moving equipment during construction, and from ongoing operation of heavy-duty on-road trucks.

Prioritization (Screening Health Risk Assessment):
A "Prioritization" is the recommended method for a conservative screening-level health risk assessment. The Prioritization should be performed using the California Air Pollution Control Officers Association's (CAPCOA) methodology. Please contact the District for assistance with performing a Prioritization analysis.

The District recommends that a more refined analysis, in the form of an HRA, be performed for any project resulting in a Prioritization score of 10 or greater. This is because the prioritization results are a conservative health risk representation, while the detailed HRA provides a more accurate health risk evaluation.

Health Risk Assessment:
Prior to performing an HRA, it is strongly recommended that land use agencies/ project proponents develop and submit for District review a health risk modeling protocol that outlines the sources and methodologies that will be used to perform the HRA.

A development project would be considered to have a potentially significant health risk if the HRA demonstrates that the health impacts would exceed the District's established risk thresholds, which can be found here: https://ww2.valleyair.org/permitting/ceqa/.

A project with a significant health risk would trigger all feasible mitigation measures. The District strongly recommends that development projects that result in a significant health risk not be approved by the land use agency.

The District is available to review HRA protocols and analyses. For HRA submittals please provide the following information electronically to the District for review:

- HRA (AERMOD) modeling files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodologies.

For assistance, please contact the District's Technical Services Department by:

- E-Mailing inquiries to: hramodeler@valleyair.org
- Calling (559) 230-5900

Recommended Measure: Development projects resulting in TAC emissions should be located an adequate distance from residential areas and other sensitive receptors to prevent the creation of a significant health risk in accordance to CARB's Air Quality and Land Use Handbook: A Community Health Perspective located at https://ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/land-use-resources.

4) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. The District recommends an AAQA be performed for any future development projects that may be approved under implementation of the Housing Element with emissions that exceed 100 pounds per day of any pollutant.

An AAQA uses air dispersion modeling to determine if emission increase from a project will cause or contribute to a violation of State or National Ambien Air Quality Standards. An acceptable analysis would include emissions from both project-specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance, is available online at the District's website: https://ww2.valleyair.org/permitting/ceqa/.

5) Voluntary Emission Reduction Agreement

Future development projects within the Housing Element area with the potential to result in a significant impact on air quality should consider the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) as a mitigation measure.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate

project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of agricultural equipment with the latest generation technologies.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document includes an assessment of the feasibility of implementing a VERA.

6) Clean Lawn and Garden Equipment in the Community

Since the Housing Element includes residential development, gas-powered residential lawn and garden equipment have the potential to result in an increase of NOx and PM2.5 emissions. Utilizing electric lawn care equipment can provide residents with immediate economic, environmental, and health benefits. The District recommends the Project proponent consider the District's Clean Green Yard Machines (CGYM) program which provides incentive funding for replacement of existing gas powered lawn and garden equipment. More information on the District CGYM program and funding can be found at: https://ww2.valleyair.org/grants/clean-green-yard-machines-residential/

7) On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the City consider incorporating solar power systems as an emission reduction strategy for future development projects.

8) Electric Infrastructure

To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District recommends that the City and project proponents install electric vehicle chargers at project sites, and at strategic locations.

Please visit https://ww2.valleyair.org/grants/charge-up for more information.

9) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (209) 557-6446.

9a) District Rule 9510 - Indirect Source Review (ISR)

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

Accordingly, future development projects within the Housing Element may be subject to District Rule 9510 if upon full buildout, the project would equal or exceed any of the following applicability thresholds, depending on the type of development and public agency approval mechanism:

Table 1: ISR Applicability Thresholds

Development Type	Discretionary Approval Threshold	Ministerial Approval / Allowed Use / By Right Thresholds
Residential	50 dwelling units	250 dwelling units
Commercial	2,000 square feet	10,000 square feet
Light Industrial	25,000 square feet	125,000 square feet
Heavy Industrial	100,000 square feet	500,000 square feet
Medical Office	20,000 square feet	100,000 square feet
General Office	39,000 square feet	195,000 square feet
Educational Office	9,000 square feet	45,000 square feet
Government	10,00 square feet	50,000 square feet
Recreational	20,000 square feet	100,000 square feet
Other	9,000 square feet	45,000 square feet

District Rule 9510 also applies to any transportation or transit development projects where construction exhaust emissions equal or exceed two tons of NOx or two tons of PM.

In the case the individual development project is subject to District Rule 9510, per Section 5.0 of the rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency so that proper mitigation and clean air design under ISR can be incorporated into the public agency's analysis.

Information about how to comply with District Rule 9510 can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview

The AIA application form can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/

District staff is available to provide assistance with determining if future development projects will be subject to Rule 9510, and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

9b) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)

In the event an existing building will be renovated, partially demolished or removed, future development projects may be subject to District Rule 4002. This rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Information on how to comply with District Rule 4002 can be found online at: https://ww2.valleyair.org/compliance/demolition-renovation/

9c) District Rule 4601 (Architectural Coatings)

Future development projects may be subject to District Rule 4601 since it may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf

9d) District Regulation VIII (Fugitive PM10 Prohibitions)

For future development projects, a project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol

9e) District Rule 4901 - Wood Burning Fireplaces and Heaters

The purpose of this rule is to limit emissions of carbon monoxide and particulate matter from wood burning fireplaces, wood burning heaters, and outdoor wood burning devices. This rule establishes limitations on the installation of new wood burning fireplaces and wood burning heaters. Specifically, at elevations below 3,000 feet in areas with natural gas service, no person shall install a wood burning fireplace, low mass fireplace, masonry heater, or wood burning heater.

Information about District Rule 4901 can be found online at: https://ww2.valleyair.org/compliance/residential-wood-smoke-reduction-program/

9f) Other District Rules and Regulations

Future development projects may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

10) Future Projects / Land Use Agency Referral Documents

Future development projects may require an environmental review and air emissions mitigation. A project's referral documents and environmental review documents provided to the District for review should include a project summary, the land use designation, project size, air emissions quantifications and impacts, and proximity to sensitive receptors and existing emission sources, and air emissions mitigation measures. For reference and guidance, more information can be found in the District's Guidance for Assessing and Mitigating Air Quality Impacts at: https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf

If you have any questions or require further information, please contact Harout Sagherian by e-mail at Harout.Sagherian@valleyair.org or by phone at (559) 230-5860.

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs



For: Daniel Martinez
Program Manager

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

December 23, 2025

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Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)
City of Patterson 2023-2031 6th Cycle Housing Element (Plan)
SCH No. 2025111094

Dear Joel Andrews:

The California Department of Fish and Wildlife (CDFW) received a NOP from the City of Patterson (City) for the Plan pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Plan that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Plan that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). Similarly, for

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, projects tiered from this Plan may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of a project may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or Federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Plan.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession, or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PLAN DESCRIPTION SUMMARY

Proponent: City of Patterson

Objective: The Plan proposes to update the City of Patterson's 2015–2023 Housing Element (adopted February 2, 2016). The Plan identifies sufficient housing sites to meet and exceed the City's Regional Housing Needs Allocation (RHNA) and plans for the development of 4,919 housing units over the eight-year planning period.

Location: The Plan area is located in central California within the City of Patterson approximately 15 miles southwest of Modesto in Stanislaus County and encompasses an area of approximately 7.5 square miles. Interstate 5 is located west of the city limits, while State Route 33 runs northwest to southeast through the planning area. The specific sites (i.e., development areas) within the Plan area and related Assessor's Parcel Numbers (APNs) are listed in Attachment 1.

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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to the City in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR prepared for the Plan.

The NOP states the Plan area's topography is generally flat, and the area proposed for development are characterized by agricultural uses. Two intermittent streams, Del Puerto Creek and Salado Creek, traverse the Plan area. Additionally, the Delta-Mendota Canal and the California Aqueduct border the Plan area to the east. Aerial Imagery shows the development areas within the Plan area are a mix of annual grasslands, fallowed agricultural lands, and anthropogenic areas surrounded by residential communities or commercial businesses.

Based on aerial imagery and species occurrence records from the California Natural Diversity Database (CNDDB) (CDFW 2025) as well as CDFW's familiarity with biological resources in the Plan area, the Plan area is known to and/or has the potential to support special-status species, and these resources need to be evaluated and addressed as part of the DEIR and prior to any approvals that would allow ground-disturbing activities. CDFW recommends that the species identified in Attachment 2 of this letter be considered as part of the DEIR that will be drafted for this Plan.

The NOP notes the biological resources evaluation for this Plan will use a programmatic approach and states that, "This evaluation is a high-level analysis for the proposed Housing Element update. Specific subsequent projects and their potential effects on biological resources are not fully known at this time. Accordingly, this analysis uses a programmatic approach to evaluating potential impacts to sensitive biological resources that may result from future housing development projects, corresponding with the conceptual level of project information available." Given that a housing element serves primarily as a planning tool and that future project-level CEQA documents and/or projects are expected to be tiered from it, CDFW recommends the following comments and measures be incorporated within the DEIR for this Plan and be applied for any future projects tiered from it.

San Joaquin Kit Fox

The NOP Initial Study (IS) includes Mitigation Measure (MM) BIO-4 to mitigate for potential impacts to San Joaquin Kit Fox (SJKF). MM BIO-4 requires a qualified biologist to conduct pre-construction surveys and implement a 200-foot no-disturbance buffer around SJKF natal/pupping dens and consult with CDFW and U.S. Fish and Wildlife. CDFW concurs with this measure and recommends adjusting the measure to include no-disturbance buffers for potential and known dens as well as outlined in U.S. Fish and Wildlife's (USFWS's) "Standardized Recommendations for Protection of the

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San Joaquin Kit Fox Prior to or During Ground Disturbance" (2011) (USFWS Protocol). If the no-disturbance buffers outlined in the USFWS Protocol for SJKF are not feasible, CDFW recommends that consultation with CDFW occur to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) would be necessary to comply with CESA.

Swainson's Hawk

The NOP IS includes Mitigation Measure (MM) BIO-5 to mitigate for potential impacts to Swainson's hawk (SWHA). MM BIO-5 requires a qualified biologist to conduct a pre-construction survey 30 days prior to the beginning of construction and implement a 0.25- or 0.5-mile no-disturbance buffer around active SWHA nests. CDFW concurs with these measures but recommends that pre-construction surveys follow the entire methodology outlined in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in the Central Valley guidance document (Swainson's Hawk Technical Advisory Committee 2000). This survey protocol requires multiple surveys and includes early season surveys to assist the project proponent in implementing necessary avoidance and minimization measures, and in identifying active nest sites prior to initiating ground-disturbing activities. CDFW also recommends that a minimum 0.5-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. In the event an active SWHA nest is detected, and a 0.5-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Tricolored Blackbird

The Plan area is within the known geographic range of tricolored blackbird (TRBL) and historical occurrences have been documented within the Plan area (CDFW 2025). Based on aerial imagery, certain development areas could provide potential foraging and nesting habitat to TRBL. As such, CDFW recommends the following mitigation measures be included in the DEIR and implemented for future projects tiered from the Plan.

Recommended Mitigation Measure 1: TRBL Habitat Assessment

CDFW recommends that construction be timed to avoid the normal bird breeding season (February 1 through September 15). However, if construction must take place during that time, CDFW recommends that a qualified biologist conduct a habitat

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assessment for TRBL prior to the initiation of project activities to determine whether suitable nesting habitat is present within the project site or project vicinity.

Recommended Mitigation Measure 2: TRBL Surveys

If suitable TRBL habitat is determined to be present, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting TRBL no more than 10 days prior to the start of implementation to evaluate presence/absence of TRBL nesting colonies in proximity to project activities and to evaluate potential Project-related impacts.

Recommended Mitigation Measure 3: TRBL Avoidance Buffer

If an active TRBL nesting colony is found during the pre-construction surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer around the colony in accordance with CDFW's "Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015" (CDFW 2015). CDFW recommends that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival.

It is important to note that TRBL colonies can expand over time. For this reason, CDFW also recommends conducting pre-construction surveys of an identified nesting colony within 10 days prior to the start of ground or vegetation disturbing activities to reassess the colony's real extent.

Recommended Mitigation Measure 4: TRBL Take Authorization

If a TRBL nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Western Burrowing Owl

The California Fish and Game Commission (FGC) approved western burrowing owl (BUOW) as a candidate for potential listing as a protected species under CESA on October 10, 2024, and published these findings in the California Regulatory Notice Register (Notice Register) on October 25, 2024. As such, BUOW is now a candidate under CESA and receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

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The NOP IS includes Mitigation Measure (MM) BIO-2 to mitigate for potential impacts to western burrowing owl (BUOW). MM BIO-2 requires a qualified biologist to conduct a pre-construction survey no more than 14 days prior to the beginning of construction and implement appropriate no-disturbance buffers as outlined in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). MM BIO-2 also states that if a BUOW den is found, and avoidance is not possible, burrow exclusion may be conducted during the non-breeding season. CDFW does not concur that MM BIO-2 is sufficient to mitigate for impacts to BUOW and avoid unauthorized take of the species. In particular, the implementation of burrow exclusion (i.e., passive relocation) would have a strong likelihood to result in the unauthorized take of BUOW, absent an ITP. As such, CDFW recommends MM BIO-2 be modified to incorporate the following:

Recommended Mitigation Measure 5: BUOW Pre-construction Surveys

CDFW recommends that focused surveys, following the 2012 Staff Report on Burrowing Owl Mitigation (2012 Staff Report) (CDFG 2012), be conducted the survey season immediately prior to project implementation. Please note that the 2012 Staff Report necessitates multiple surveys prior to the initiation of construction.

Recommended Mitigation Measure 6: BUOW Avoidance Buffer

Should a BUOW or known BUOW den (active or inactive) be detected, either during pre-construction surveys or construction activities, CDFW recommends that no-disturbance buffers, as outlined in the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012), be implemented prior to and during any ground-disturbing activities. CDFW also recommends that these buffers be implemented for both wintering and breeding BUOW.

Recommended Mitigation Measure 7: BUOW Take Authorization

If a BUOW or known BUOW den (active or inactive) is detected, and the no-disturbance buffers outlined in the 2012 Staff Report on Burrowing Mitigation are not feasible, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) would be necessary to comply with CESA.

Crotch's Bumble Bee

The Plan area is within the known geographic range of Crotch's bumble bee (CBB) and historical occurrences have been documented within the Plan area (CDFW 2025). CBB are known to inhabit areas of grasslands and scrub that contain requisite habitat

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elements for nesting, such as small mammal burrows and bunch/thatched grasses. Based on aerial imagery, these habitat elements may be present within several of the development areas within the Plan area. As such, CDFW recommends the following:

Recommended Mitigation Measure 8: CBB Habitat Assessment

CDFW recommends a qualified biologist conduct a habitat assessment to determine if the entire project site and the immediate surrounding vicinity contain habitat suitable to support CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.

Recommended Mitigation Measure 9: CBB Surveys Prior to Construction

If potentially suitable habitat is identified, regardless of what time of year project activities will be conducted, CDFW recommends that a qualified biologist conduct focused surveys for CBB and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

Recommended Mitigation Measure 10: CBB Avoidance

If CBB is detected, CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement project activities and avoid take. Any detection of CBB prior to or during project implementation warrants consultation with CDFW to discuss how to avoid take.

Recommended Mitigation Measure 11: CBB Take Authorization

If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Special-Status Bats

The NOP IS includes Mitigation Measure (MM) BIO-2 to mitigate for potential impacts to special-status bats. MM BIO-7 requires a qualified biologist to conduct pre-construction surveys within 14 days of tree removal or construction activities. MM BIO-7 also states the surveys shall include visual inspection of guano, construction access routes, cavities, crevices, exfoliating bark, bark fissures that could provide suitable potential

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nest or roost habitat, and use of a bat echolocation detector such as an “Anabat” unit. CDFW concurs with these mitigation measures and recommends that any focused surveys be conducted within one 24-hour period and be conducted during dusk emergence and pre-dawn re-entry.

Species of Special Concern

The Plan area is within the known geographic range of American badger (AMBA), coast horned lizard (CHL), Northern California legless lizard (NCLL), San Joaquin coachwhip (SJC), and western spadefoot (WESP). Based on aerial imagery, suitable habitat may be present within several of the development areas within the Plan area. As such, CDFW recommends the following:

Recommended Mitigation Measure 12: Special-Status Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment to determine if the project site and the immediate surrounding vicinity contain habitat suitable to support AMBA, CHL, NCLL, SJC, and WESP.

Recommended Mitigation Measure 13: Pre-construction Survey for Special-Status Species

If suitable habitat is identified, prior to the start of work, CDFW recommends that a qualified biologist conduct focused surveys for AMBA, CHL, NCLL, SJC, and/or WESP and their requisite habitat features.

Recommended Mitigation Measure 14: Special-Status Species Avoidance

Avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around these species and their associated burrows and habitat areas. CDFW also recommends that if these species are found, project activities in their immediate vicinity cease, allowing individuals to leave the project site on their own accord.

Editorial Comments and/or Suggestions

Nesting birds: For future project site(s) tiered from the Plan, CDFW encourages that all ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February 15 through September 15), developers are responsible for ensuring that implementation of their project does not result in a violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

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CDFW recommends that a qualified biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the project site to identify nests and determine their status. A sufficient area means any area potentially affected by the project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Cumulative Impact Analysis: Given that a housing element serves primarily as a planning tool and that future project-level CEQA documents and/or projects are expected to be tiered from it, CDFW recommends that a cumulative impact analysis be conducted for all potential biological resources that will either be significantly or potentially significantly impacted by implementation of the Plan, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by any future project, even if those impacts are expected to be relatively small (i.e. less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the project. An appropriate resource study area identified and utilized for this analysis is advised. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Plan Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in

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support of the Plan's DEIR be used to develop and modify the Plan's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. When efforts to avoid and minimize have been exhausted, CDFW advises that remaining impacts to sensitive biological resources be mitigated to reduce impacts to a less than significant level, if feasible.

California Natural Diversity Database: Please note that the CNDDB is populated by voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDB does not mean that a species is not present. In order to adequately assess any potential project-related impacts to biological resources, surveys conducted by a qualified biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present.

Lake and Streambed Alteration: Reasonably foreseeable future projects tiered from this Plan may be subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires project proponents to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial in nature. For additional information on notification requirements, please contact our staff in the Lake and Stream Alteration Program at (559) 243-4593, or R4LSA@wildlife.ca.gov. CDFW therefore recommends that the Plan DEIR include information related to these requirements of Fish and Game code and advises that projects tiered from this Plan retain a qualified biologist to determine if potential impacts to streams may require the need to notify pursuant to Fish and Game Code section 1602.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during project surveys to the California Natural Diversity Database. The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of

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information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

The Plan, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Plan impacts on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Please see the enclosed, Attachment 3, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to John Riedel, Environmental Scientist, at (559) 807-1453 or john.riedel@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager

ATTACHMENT 1- Site Assessor's Parcel Number Table
ATTACHMENT 2- Special-Status Species Table
ATTACHMENT 3- MMRP

ec: Maggie Sepulveda
U.S. Fish & Wildlife Service
margaret sepulveda@fws.gov

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State Clearinghouse
Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

Docusign Envelope ID: 914D71E2-81B2-4DF4-AF26-8A7F6D1DD7EA

REFERENCES

California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. Sacramento, California, USA.

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California Department of Fish and Wildlife. 2025. Biogeographic information and observation system (BIOS). https://www.wildlife.ca.gov/Data/BIOS. Accessed 10 December 2025.

Swainson's Hawk Technical Advisory Committee. 2000. Recommended timing and methodology for Swainson's hawk nesting surveys in California's Central Valley. Swainson's Hawk Technical Advisory Committee.

U. S. Fish and Wildlife Service. 2011. Standard recommendations for the protection of the San Joaquin kit fox prior to or during ground disturbance. Sacramento Fish and Wildlife Office, Sacramento, California.

Attachment 1

Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
ASSESSOR'S PARCEL NUMBER TABLE

PROJECT: City of Patterson 2023-2031 6th Cycle Housing Element

SCH No.: 2025111094

Project Site Number	Assessor's Parcel Number
1A	021-023-027, 021-023-026
1B	021-023-023, 021-023-024, 021-023-025, 021-023-020, 021-023-021, 021-023-022, 021-023-017, 021-023-018, 021-023-019
2	021-091-007, 021-091-008
3	021-040-055
4	047-024-024
5	047-034-035
6	048-042-001
7	048-042-008
8	048-043-002
9	048-042-015
10	048-048-007
11	047-031-062
12	021-028-007
13	021-028-008
14	021-098-003

Attachment 2

Attachment 2

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
SPECIAL-STATUS SPECIES TABLE

PROJECT: City of Patterson 2023-2031 6th Cycle Housing Element

SCH No.: 2025111094

Common Name	Scientific Name	Status	
		State	Federal
San Joaquin kit fox	*Vulpes macrotis mutica*	T	E
Swainson's hawk	*Buteo swainsoni*	T	-
Tricolored blackbird	*Agelaius tricolor*	T	-
Western burrowing owl	*Athene cunicularia hypugaea*	C	-
Crotch's bumble bee	*Bombus crotchii*	C	-
American badger	*Taxidea taxus*	SSC	-
Pallid bat	*Antrozous pallidus*	SSC	-
Townsend's big-eared bat	*Corynorhinus townsendii*	SSC	-
Loggerhead shrike	*Lanius ludovicianus*	SSC	-
Coast horned lizard	*Phrynosoma blainvillii*	SSC	-
Northern California legless lizard	*Anniella pulchra*	SSC	-
San Joaquin coachwhip	*Masticophis flagellum ruddocki*	SSC	-
Western spadefoot	*Spea hammondii*	SSC	PT

~~E= Endangered,~~ T=Threatened, C= Candidate for listing as Threatened and/or Endangered, SSC= Species of Special Concern, ~~FP= Fully Protected,~~ PT=Proposed Threatened, (-)= None

Attachment 3

Docusign Envelope ID: 914D71E2-81B2-4DF4-AF26-8A7F6D1DD7EA

Attachment 3

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: City of Patterson 6th Cycle Housing Element

SCH No.: 2025111094

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Tricolored Blackbird (TRBL)	
Recommended Mitigation Measure 1: TRBL habitat assessments	
Recommended Mitigation Measure 2: TRBL surveys	
Recommended Mitigation Measure 4: TRBL take authorization	
Western Burrowing Owl (BUOW)	
Recommended Mitigation Measure 5: BUOW pre-construction surveys	
Recommended Mitigation Measure 7: BUOW take authorization	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 8: CBB habitat assessments	
Recommended Mitigation Measure 9: CBB pre-construction surveys	
Recommended Mitigation Measure 11: CBB take authorization	
Special-Status Species (SSS)	
Recommended Mitigation Measure 12: SSS habitat assessments	
Recommended Mitigation Measure 13: SSS pre-construction surveys	
During Construction	
Tricolored Blackbird (TRBL)	

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Recommended Mitigation Measure 3: TRBL avoidance buffer	
Western Burrowing Owl (BUOW)	
Recommended Mitigation Measure 6: BUOW avoidance buffer	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 10: CBB avoidance buffer	
Special-Status Species (SSS)	
Recommended Mitigation Measure 14: SSS avoidance buffer	

NATIVE AMERICAN HERITAGE COMMISSION

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Paskenta Band of Nomlaki Indians

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

November 26, 2025

Joel Andrews
City of Patterson
PO Box 667
Patterson CA 95363

Re: 2025111094 City of Patterson 2023-2031 6th Cycle Housing Element Project, Stanislaus County

Dear Mr. Andrews:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

RECEIVED
CDD/PLANNING DIVISION
DEC 09 2025
BY:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@NAHC.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse

RUTAN
RUTAN & TUCKER, LLP

Matthew D. Francois
Direct Dial: (650) 798-5669
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January 5, 2026

VIA E-MAIL - jandrews@pattersonca.gov

Joel Andrews
City Planner, Planning Division
CITY OF PATTERSON
1 Plaza
Patterson, CA 95363

Re: Keystone Ranch: Notice of Preparation of a Draft Environmental Impact Report/Initial Study for the City of Patterson's 2023-2031 6th Cycle Housing Element

Dear Mr. Andrews:

We write on behalf of our client, Keystone Ranch, LLC ("Keystone") to provide comments on the Notice of Preparation of a Draft Environmental Impact Report/Initial Study for the City of Patterson's 2023-2031 6th Cycle Housing Element (the "Initial Study").

As you know, Keystone is the owner of approximately 95 acres of land located in the Zacharias & Baldwin Ranch Master Plan ("Master Plan"). The Master Plan designates Keystone's property for 719 residential units and identifies it as the very first project to be developed as part of the Master Plan. (Master Plan, pp. 98, 114-115.) In August 2022, the City Council certified an Environmental Impact Report ("EIR") for the Master Plan which thoroughly analyzed and addressed the environmental impacts associated with Master Plan development. The City's Draft Housing Element likewise identifies Keystone's site and its 719 units as a key housing opportunity site—identified as Site 1A—needed for the City to meet its Regional Housing Needs Allocation ("RHNA") of 3,716 units. (Initial Study, Figure 2.) Despite the City's plans identifying Keystone's property as a designated, necessary site for housing, the City Council denied Keystone's application for a 719-unit housing project (the "Project") on April 1, 2025.

With this background in mind, we turn to our comments on the Initial Study.

1. Scope of Housing Element EIR

The Initial Study describes the project to be evaluated in the Housing Element EIR as the "development of 4,919 housing units over the eight-year planning period, which exceeds the City's RHNA of 3,716 units by 1,548 units." (Initial Study, p. 2.) Of those 4,919 units, 3,545 are from the Master Plan and were analyzed in the Master Plan EIR. (Initial Study, p. 3.) In other words, the

environmental impacts of those units have already been studied as part of the Master Plan EIR and would not be subject to any new or additional mitigation measures as a result of the Housing Element EIR.

The Initial Study refers to the Master Plan in its project description and to the Master Plan EIR in some (but not all) of the environmental resource topics. For instance, the Biological Resources section purports to include Site 1A (Keystone Ranch) and Site 1B (Lakeside Hills) in its impact analysis even though those sites were analyzed as part of the Master Plan EIR. (Initial Study, pp. 35-45 [referring to potential impacts and mitigation measures for San Joaquin Kit Fox, Swainson's Hawk, Special-Status Bats, Nesting Birds and Raptors, and Protected Wetlands/Waters.) The Greenhouse Gas Emissions section likewise purports to impose Mitigation Measure GHG-1 on all "[p]rojects proposed under the Housing Element." (Initial Study, p. 59.) The Transportation section also purports to impose Mitigation Measure TR-1 on all residential projects included in the Housing Element. (Initial Study, pp. 84-85.)

The scope of the Housing Element EIR should clearly and consistently reflect that the Master Plan units were thoroughly studied as part of the Master Plan EIR and are not subject to additional impact analysis or mitigation as part of the Housing Element EIR. The scope of the Housing Element EIR should appropriately focus on the environmental impacts of the 1,374 units that were not part of the Master Plan and were not studied in the Master Plan EIR. These units are primarily comprised of the sites identified for General Plan and Zoning amendments in Table 3 to the Initial Study.

2. The Initial Study's treatment of impacts to groundwater resources with respect to the Housing Element Update is directly opposite to the City's treatment of impacts to groundwater resources with respect to the Keystone Ranch Project.

a. The City denied the Keystone Ranch Project based on the alleged inadequacy of groundwater supplies due to revised groundwater sustainability plans.

On April 1, 2025, the City Council denied Keystone's Project because it would not agree to fully advance the $20 million cost of the Del Puerto Creek Project (also known as the City Perc Pond Project), forego development for an estimated five-plus years until that project is constructed and operational, and purchase surface water supplies from nearby Irrigation Districts to be recharged at the Del Puerto Creek Project. The City claimed that without these measures there would be significant impacts to groundwater resources requiring a supplemental EIR due to new pumping reductions mandated by the draft Delta-Mendota Subbasin Groundwater Sustainability Plan ("GSP"). In stark contrast to the City's denial of the Project, the Initial Study finds that impacts to Hydrology (Chapter 10) and Utilities and Service Systems (Chapter 19) are less than significant without the need for any identified mitigation measures.

b. The Initial Study concludes that the City has adequate groundwater resources to serve new housing development.

The Initial Study observes that the City's "sole source of water supply is groundwater from the Delta-Mendota Subbasin." (Initial Study, p. 88.) It states that the City operates five active production wells and two standby wells that collectively provide potable water for residential, commercial, industrial, and institutional users within City limits. (*Ibid.*) It notes that the proposed housing opportunity sites have an estimated total water demand of 1,851 acre feet per year ("afy") and that this demand corresponds to an average of approximately 96 gallons per capita per day, which is below the City's 2020 per capita water use target of 164 gallons per day, thereby "indicating the project's estimated water demand is consistent with City-wide efficiency goals." (Initial Study, p. 88.) The Initial Study concludes that the City has adequate water supplies to serve new housing development:

> According to the *City of Patterson 2020 Urban Water Management Plan* (2021), groundwater supplies from the Delta-Mendota Subbasin are sufficient to meet existing and projected water demands within the City through 2045 under normal, single-dry, and multiple-dry year conditions. Therefore, adequate water supplies are available to serve the proposed project.

(Initial Study, p. 88.)

c. The Initial Study concludes that new housing development does not conflict with the GSP.

The Initial Study finds that impacts to groundwater recharge will be less than significant due to new development complying with stormwater management requirements and the City's proposed Del Puerto Creek Project. (Initial Study, pp. 67-68.) In terms of the stormwater management requirements, all new development projects must incorporate stormwater management measures to protect water quality and maintain natural hydrology. (Initial Study, p. 67.) Such measures include on-site retention or detention basins to maintain natural infiltration processes and reduce potential long-term effects on groundwater recharge. (*Ibid.*)

In regard to the Del Puerto Creek Project, the Initial Study states that the City is "currently designing percolation ponds and diversion structures to divert and infiltrate stormwater discharges from Del Puerto Creek and stormwater runoff captured from the planned Zacharias Master Plan development." (*Ibid.* [emphasis added]) The Initial Study states that this project is expected to generate 1,700 acre feet per year of direct groundwater recharge to both the upper and lower aquifers "using stormwater collected within Patterson and storm flows conveyed to designated recharge areas." (Initial Study, pp. 67-68 [emphasis added].) It notes that together the stormwater management requirements and the planned recharge project "would maintain and enhance groundwater infiltration capacity, offsetting potential recharge reductions associated with new residential development." (Initial Study, p. 68.)

The Initial Study further finds that the Housing Element update would not conflict with or obstruct implementation of a sustainable groundwater management plan. (Initial Study, pp. 69-70.) The Initial Study states that "a draft consolidated GSP was released July 29, 2024 and, as of October 2025, has not been adopted by the [groundwater sustainability agencies] or approved by the State Water Resources Control Board." (Initial Study, p. 69.) It notes that the draft consolidated GSP identifies a series of management actions that each groundwater sustainability agency must implement to achieve and maintain basin sustainability. Management actions applicable to the City of Patterson include: "implementation of drought contingency planning in urban areas (NDM-2); construction of percolation ponds for stormwater capture and groundwater recharge (NDM-10); and reduction of groundwater extraction within the GSA's portfolio (NDM-15)." (Initial Study, pp. 69-70.) The Initial Study also states that the City is responsible for these action items. (Initial Study, p. 70.)

3. Impacts to Tribal Cultural Resources

Chapter 18 of the Initial Study does not contain any analysis of potential impacts to Tribal Cultural Resources. It simply states that no responses or requests for consultation were received by the City in response to its letters to affected tribes offering consultation.

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Thank you for your consideration of Keystone's comments on the Initial Study. Please include me on the list to receive copies of any future notices or documents related to the City's Housing Element EIR. Feel free to contact me or Keith Schneider at (209) 892-5727 with any questions regarding this correspondence.

Very truly yours,

RUTAN & TUCKER, LLP

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