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Re: Draft Analysis of Impediments to Fair Housing Choice and Draft 2020-2025 Consolidated Plan

The Delta Sierra Group of the Sierra Club respectfully submit comments on the 2020 Draft Analysis of Impediments to Fair Housing Choice and Draft 2020-2025 Consolidated Plan. The Sierra Club has a long tradition of advocating for fair housing policies that improve housing availability. In 2018, Sierra Club California published *Sierra Club California Housing Policy: Meeting Our Housing Needs and Protecting the Environment*¹ that called for the following actions to improve housing availability:

- Adoption of inclusionary zoning policies.
- Development of programs for local funding of low-income housing through the establishment of housing trust funds.
- Incentives for low-income housing development including exemptions from parking and traffic limitations.
- Funding for the rehabilitation of older housing to affordable units.
- Legalization of “in-law” or second units without additional parking requirements.
- Broadening of zoning ordinances to more readily accommodate quality manufactured housing as an alternative to more expensive conventional housing.
- Inclusion of housing in commercial areas, by adding residential use to new and existing commercial areas and by redeveloping vacant or underused retail/office/industrial areas with mixed use and housing.

The City of Stockton has considered some of these recommendations such as allowing accessory dwelling if certain requirements are met and is in the process of updating the Zoning Code relating to the adoption of Envision 2040 – the General Plan. We request that as the zoning update is developed that Sierra Club recommendations are considered.

Draft Analysis of Impediments to Fair Housing Choice and 2020-2025 Consolidated Plan

The development and adoption of Analysis of Impediments to Fair Housing Choice provides the certification to the U.S. Department of Housing and Urban Development (HUD) that the entitlement jurisdiction is furthering fair housing when submitting Consolidate Housing Plans. Evidence supporting the actions identified that are appropriate to overcome the impediments to fair housing house is documented in annual plans. The following Table 1 includes the assessment of Five-Year Achievements included in the 2020-2025 Draft Consolidation Plan indicates that while some programs were successful others were unfortunately lacking, contributing to increased unmet housing needs.

¹ https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/sierra-club-california/PDFs/SCC_Housing_Policy_Report.pdf
Accessed 3.16.2020.

Specific Annual Objectives	Funds	Performance Indicators	Five-Year Goal	Year 1 FY15/16	Year 2 FY16/17	Year 3 FY17/18	Year 4 FY18/19
Rental Units Constructed	CDBG; HOME	Housing Units	140	0	81	0	0
Direct Financial Assistance to Homebuyers	CDBG; HOME	Homebuyers	20	0	0	0	0
Rental Units Rehabilitated	CDBG; HOME	Units	30	0	95	0	0
Homeowner Housing Rehabilitated	CDBG; HOME	Units	60	7	6	1	7
Public Facilities or Infrastructure Other Than Low/Mod Housing Benefit (Homelessness)	CDBG; ESG	Facilities/ Activities	4	1	1	0	0
Homeless Person Overnight Shelter	CDBG; ESG	Persons	15,000	3,469	4,453	4,671	3,730
Homelessness Prevention and Rehousing	CDBG; ESG	Persons	1,000	83	125	153	169
Rental Units Rehabilitated or Constructed	CDBG; HOME; ESG	Units	80	0	0	0	0
Homeowner Housing Rehabilitated	CDBG; HOME; ESG	Units	30	6	7	3	0
Public Facilities or Infrastructure Other Than Low/Mod Housing Benefit (Special Needs)	CDBG; HOME; ESG	Facilities/ Activities	3	0	0	0	0

Table 1 - Assessment of Five Year Achievements

Catching up with the Homeless Person Overnight Shelter program is necessary but so is Homelessness Prevention and Rehousing, Rental Units Rehabilitated or Constructed, Homeowner Housing Rehabilitated. A balanced proactive approach is needed to ensure that housing goals are achieved, and which will be documented in next year's annual report.

Delta Sierra Group comments on the Draft Analysis of Impediments to Fair Housing Choice and 2020-2025 Consolidated Housing Plan include recommendations in bold italicized text with topics including: Clarifications, Characterization relating to Population and Housing, the City of Stockton Rental Program, Housing Vouchers, and Recommendations.

Clarifications

- The executive summary states that the City of Stockton is the second largest city in the larger San Joaquin Valley yet Section 2 states: The City of Stockton represents the largest incorporated community in San Joaquin County and the third largest city in the San Joaquin Valley, behind Fresno and Bakersfield. ***These statements require clarification.***
- Section 2 pg. 3 has a typo in the area of demographic characterization: For example, while the proportion of residents who are under the age of 18 declined by 2.6 percent and the proportion of residents between 18 and 24 years of age declined two percent, the proportion of residents who are age 25 through **34** increases 12.1 percent. ***The bolded number should be added.***

Characterization

Population

The City of Stockton population is aging with residents 55 or older representing 100,368 of the 304,358 residents in 2017 or 33 percent. Table 3 pg. 5 reported the race and ethnicity of Stockton residents. The ethnicity was divided between Non-Hispanic or Latin (57.8%): Whites alone 21.2%, Black or African American alone 11.1%, Asians alone 21.2%; and Hispanic or Latino (42.2%): Whites alone 22.7%, some other race alone 11.7% and Two or more races 6.4%. All together the non-Hispanic white population continued decreasing to 21.2% and the minority residents increased to 78.8%. Yet Non-Hispanic or Latino individuals account for the majority of the homeless population, regardless of shelter status, though Hispanic individuals still account for an estimated 26.6 percent of the unsheltered population, 30.7 percent of the emergency shelter population, and 19.7 percent of the population living in transitional housing.

Special needs populations that require (not may require) special consideration with regard to fair housing issues including seniors, persons with disabilities, large households, farmworkers, homeless persons and person diagnosed with AIDS and related diseases. The City of Stockton does not participate in the HUD Housing Opportunities for Persons with AIDS (HOPWA) Program.²

Using the available data, the average income necessary to rent a one bedroom apartment (most common type) would require an annual income of \$40,000 (30%). About 57.5 percent of all households likely struggle to reasonably afford rental housing. Table 24: Rental Market Overview, Q4 2018 is included for reference to demonstrate multi-family rental units and income requirements.

Table 24: Rental Market Overview, Q4 2018

Unit Size	Total Units	Average Square Footage	Average Rent	Average Rent per Square Foot	Utility Allowance	Required Income
Studio	924	496	\$943	\$2.01	\$52	\$39,800
1 Bedroom	7,513	624	\$936	\$1.52	\$73	\$40,360
2 Bedroom	6,693	922	\$1,192	\$1.29	\$89	\$51,240
3 Bedroom	1,036	1,220	\$1,175	\$0.96	\$109	\$51,360
4 or more Bedroom	94	1,451	\$981	\$0.66	\$145	\$45,040
Total, All Units	17,131	779	\$1,065	\$1.35	\$76	\$45,647

Sources: CoStar, 2019; San Joaquin Housing Authority, 2018; BAE, 2019.

The utilities allowance listed above are based on the 2018 utility allowance schedule published by the Housing Authority of the County of San Joaquin (HACSJ). ***Information regarding utilities assistance programs – the Pacific Gas and Electric CARE program and California Water Service LIRA programs should be readily accessible to all residents of Stockton and links for these programs posted on the City of Stockton Housing webpage.***

The Draft Consolidated Plan stated:

Once adjusted for inflation based on the Bureau of Labor Statistics' (BLS) Consumer Price Index (CPI), the effective median household income actually decreased by roughly 18 percent, or \$9,850 over this period. More recent data (2017 ACS 1-Year Estimates) from the U.S. Census Bureau indicate that the Stockton median household income increased somewhat from the 2011-2015 period, to an estimated \$51,336 in 2017, which is a decrease of \$6,769, or 11.7 percent, over the inflation adjusted 2005-2009 estimate.

² 2020-2025 Draft Consolidated Plan Revised Internal Review Draft January 28, 2020

The income distribution from the Draft Consolidated Plan indicates that a significant proportion of Stockton households are income stressed especially households with one or more children 6 years or younger. *Plans to house the proportion of our community with young families should be a priority.*

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	15,095	13,695	15,025	9,050	39,580
Small Family Households	5,865	5,720	6,600	4,290	19,460
Large Family Households	1,915	2,500	2,625	1,730	6,490
Household contains at least one person 62-74 years of age	1,975	2,570	2,970	1,820	9,030
Household contains at least one person age 75 or older	1,320	1,555	1,805	989	3,660
Households with one or more children 6 years old or younger	4,325	3,915	3,910	2,010	6,460

>80-100% HAMFI are considered middle class. The actual HAMFI used unknown, the 2015 Median income: \$44,797.00

>100% HAMFI are considered upper class.

Table 7 - Total Households Table

Data Source: 2011-2015 CHAS

The communication of information including rights and responsibilities of renters, leasing and loan documents is hindered when information is only available in English. Persons with a limited knowledge of the English language can often experience discrimination in housing due to racial, ethnic, or cultural bias. Additionally, once housing is secured difficulties can occur relating to interpreting posted notices and correspondence. As a result, persons with limited English proficiency (LEP) are identified as a protected class under the Fair Housing Act, as well as applicable California law. Table 14 characterizes languages levels throughout the City of Stockton. While 53% of the population assuredly speaks English (English only), 47% speak another language at home. Characterizing the non-English at home population suggests that up to one in four non-English households have limited English Proficiency. *Translations of information are essential for these households to access services and information necessary to secure and retain housing units.*

Table 14: Population by Language Spoken at Home and Percent of Households with Limited English Proficiency, City of Stockton and San Joaquin County, 2013-2017

Language Spoken	City of Stockton			
	Population by Primary Language Spoken (a)		Population with Limited English Proficiency (b)	Households with Limited English Proficiency (c)
	Number	Percent		
Spanish	77,560	27.6%	40.9%	22.1%
Other Indo-European languages	10,791	3.8%	40.1%	16.0%
Asian and Pacific Island languages	41,092	14.6%	52.8%	26.1%
Other languages	1,984	0.7%	27.8%	24.1%
Total, All Non-English	131,427	46.8%	44.30%	n.a.
English Only	149,549	53.2%	n.a.	n.a.
Total, All Languages	280,976	100%	20.7%	10.9%

Notes:

(a) Represents the population age five years and over by the primary language spoken at home.

(b) Percent of population age five years and over who does not speak English or speaks English less than "very well."

(c) Percent of households where no one age 14 and over speaks English only, or speaks English "very well."

Sources: U.S. Census Bureau, ACS 2017 5-year sampling period, S1601, S1602; BAE, 2019.

We recommend that that translation of all information that the City provides at housing information distribution locations and on the website be available in at least the top four languages spoken in our city other than English.

Housing Characteristics and Condition

The City of Stockton multiple-family units housing stock is approximate 6% less than the statewide average of 31% indicating a need for more multiple-family units. The available house stock units are larger than the population requiring rental or ownership needs which results in lower income households overpaying or living together with other families causing overcrowding situations (11%).

Most of the annual 881 code enforcement actions related to housing code violations (ownership and rental properties) occur in the geographic area of the city's older neighborhoods including downtown, midtown and South Stockton areas where many buildings constructed in the late 1800's and early 1900's. A large proportion of housing units in these areas are either older or approaching 100 years. If those units are held by investors, they may represent a large proportion of dilapidated structures in need of rehabilitation. ***The City of Stockton enforcement in these situations must be more aggressive with the statistics readily available to dissuade other landlords.*** The City's existing Code states:

8.32.140 Enforcement.

If, after a notice and order to repair has been issued, a property owner designated management entity fails to correct the violation, the City may utilize any administrative or legal remedy available. Further, the City intends to utilize the provisions of Revenue and Taxation Code Section 24436.5 to encourage the elimination of substandard conditions in rental housing. Said section provides for the disallowance for State income tax purposes of interest, depreciation, taxes, or amortization deductions, which are derived from the ownership of rental housing, which is not in compliance. The City is also authorized to use the remedies set forth in State Housing Law and the Stockton Municipal Code. (Prior code § 7-111.73)

Of these 881 average annual code enforcement actions no, clear breakdown was provided to distinguish between owner occupied and rental. ***Please provide these characteristics statistics in all reports so that the community can consider actions to specifically address these code enforcement actions.***

The Draft Analysis of Impediments to Fair Housing included the statement that "These vacancy rates remain somewhat above what is typically considered normal (i.e., five to six percent) and provide valuable opportunities for improved access and affordability. A significant portion of the vacant units reported below in Table 22 for 2017 are classified as "Other vacant".

Of all housing in the City of Stockton, 7.9% were vacant housing units. The City has had troubles regarding vacant properties since the 2008 housing downturn. The problems associated these vacant properties resulted in the City of Stockton Council to enact the Vacant and Abandoned Buildings and Properties SMC 15.32³. ***The City's enforcement of the provisions in Stockton Municipal Code may result in properties becoming ready to receive rental income. A distribution of the "Other Vacant" properties should have been characterized to determine the potential of becoming occupied and thus relieving some of the City's housing needs.***

³ <http://ww1.stocktonca.gov/-/media/Stockton-Website/Departments/Police-Homepage/Code-Enforcement/Code-Enforcement/Code-Enforcement-brochures/Vacant-Property-Bouchure.pdf?la=en&hash=A4F97196F9E263B08C2EB4FF1007FF7CC6B9AD87> Accessed 3.16.2020.

Table 22: Occupancy and Vacancy Status, 2006-2010 and 2013-2017

Occupancy Status	City of Stockton			
	2010		2017	
	Number	Percent	Number	Percent
Occupied Housing Units	90,375	90.9%	93,746	92.1%
Vacant Housing Units	9,001	9.1%	8,018	7.9%
For rent	3,155	3.2%	3,150	3.1%
For sale only	1,625	1.6%	594	0.6%
Rented or sold, not occupied	1,099	1.1%	795	0.8%
For seasonal or occasional use	329	0.3%	550	0.5%
For migrant workers	29	0.0%	0	0.0%
Other vacant (a)	2,764	2.8%	2,929	2.9%
Total, All Housing Units	99,376	100%	101,764	100%

Occupancy Status	San Joaquin County			
	2010		2017	
	Number	Percent	Number	Percent
Occupied Housing Units	212,905	92.1%	223,808	93.5%
Vacant Housing Units	18,209	7.9%	15,445	6.5%
For rent	4,794	2.1%	4,715	2.0%
For sale only	4,071	1.8%	1,195	0.5%
Rented or sold, not occupied	2,324	1.0%	2,563	1.1%
For seasonal or occasional use	1,226	0.5%	1,356	0.6%
For migrant workers	106	0.0%	66	0.0%
Other vacant (a)	5,688	2.5%	5,550	2.3%
Total, All Housing Units	231,114	100%	239,253	100%

Note:

(a) If a vacant unit does not fall into any of the classifications specified above, it is classified as "other vacant." For example, this category includes units held for occupancy by a caretaker or janitor and units held by the owner for personal reasons.

Sources: California Association of Realtors, 2019; BAE, 2019.

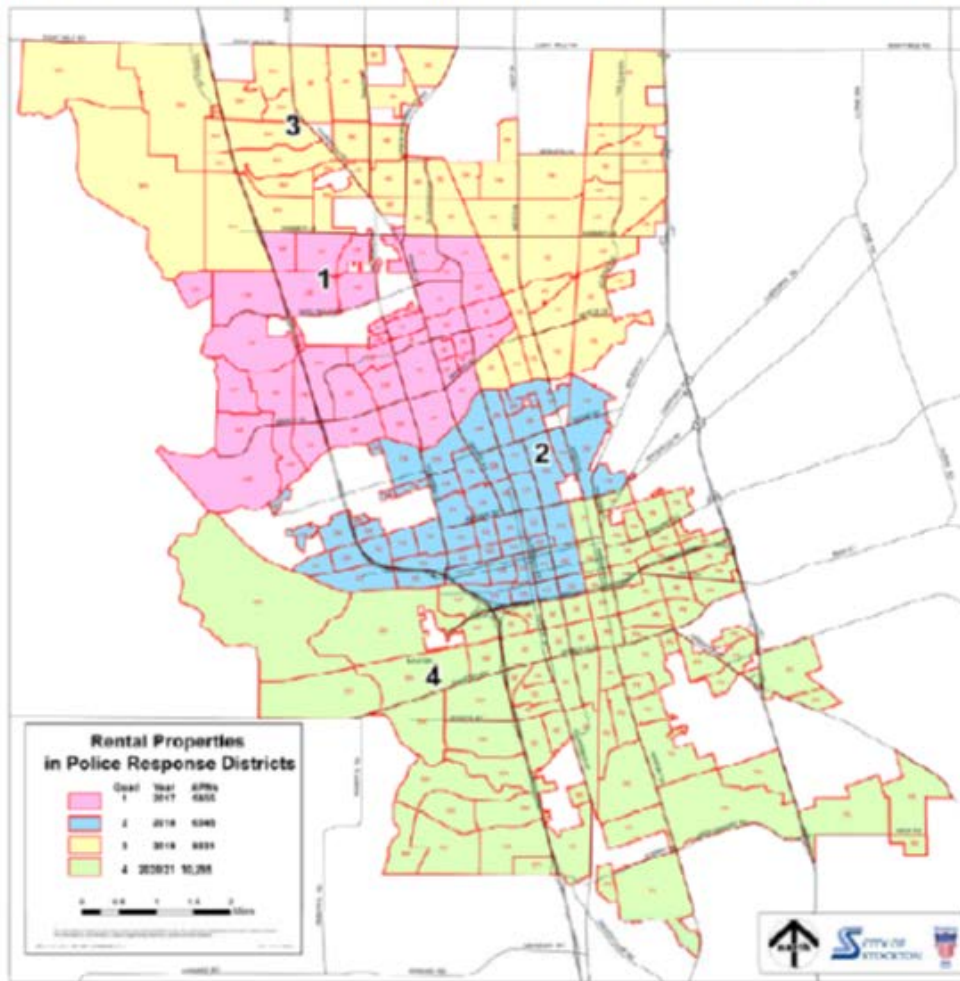
City of Stockton Rental Program

According to the City of Stockton website – all residential rental units are required to be inspected once every five years.⁴ Figure 13 below shows the locations of the quadrants within the City that are inspected and characterized. The following information was included in the Draft Analysis of Impediments.

Quadrant	Quadrant 1	Quadrant 2	Quadrant 3	Quadrant 4
Location	Northwestern Stockton, between March Lane and Hammer Lane	North of the Stockton Downtown, roughly between March Lane and Harding Way,	Upper north Stockton, roughly located north of Hammer Lane	the majority of the City of Stockton to the south of Harding Way, including both South Stockton and Downtown
Year of Last Inspection	2017	2018	2019 through October	2015 and 2016
Inspections	287 unique properties	748 unique properties	706 unique properties	Approximately 745 units
Violations	Approximately 51 percent of inspected properties failed to pass inspection (146), with less than one percent totaling two properties failing for hazardous reasons	Exactly half of the inspected properties failed to pass inspection (374), with three percent totaling 20 properties failing for hazardous reasons	So far, 54 percent failed to pass inspection (381), with four percent totaling 26 properties failing for hazardous reasons.	Around 46 percent of the inspected properties failed to pass inspection (343), with seven percent totaling 50 properties failing to pass inspection.

⁴ <http://ww1.stocktonca.gov/Departments/Police/Enforcement-and-Prevention/Residential-Rental-Inspection-Program> Accessed 3.14.2020

Figure 13: Residential Rental Inspection Program Response Districts



Sources: City of Stockton, 2016.

The total number of inspections 2015-2019 within the four quadrants was 2,486 units with 1,244 failing the inspection (50%). ***The data included did not specify the total number of housing units in the program that self-certify, nor how many of the reported inspections represented the required 10% random inspection of self-certifying properties.***

The Analysis of Impediments also included the following statements:

“Quadrant 1, identified in Figure 13 on the following page, was most recently inspected in 2012. The inspection included 5,600 unique properties, with approximately 6.9 percent failing to pass inspection. Quadrant 2 was inspected in 2013 and included inspection of 4,900 properties, with 6.8 percent failing the inspection. Quadrant 3 was last inspected in 2014 and included 8,500 unique properties, with 9.4 percent failing inspection. Quadrant 4 is undergoing inspection in 2015 and 2016 and is expected to include a total of around 9,000 unique properties. Though the inspection has not yet occurred, NSD anticipates identifying an above average proportion of properties presenting a variety of code violations.”

The information from 2012-2016 indicated that a significantly greater number of properties were inspected: 28,000 units vs 2486 units 2015-2019. The total number of violations for Quadrants 1,3, and 3 for the period 2012-2016 were 1,478 vs 1,244 in 2015-2019. ***Please provide an explanation of these vastly different number of inspections.***

The City's Rental Inspection Program is an essential part of maintaining and verifying that safe housing units are available for renters in our community. The Analysis of Impediments stated that "pro-active and sustained code enforcement for single-family housing as well as market rate multi-family housing as well as with strong renter protections as a serious housing need. For example, numerous stakeholders indicate that lower income residents who live in poorly maintained rental units are hesitant to file a code enforcement complaint out of fear of retaliatory eviction."

This is a problem of intimidation which is not uncommon in neighborhoods high in violence. Safe housing involves crime yet that was not a matrix evaluated as a possible impediment to housing when in fact investors consider the safety of at least their property to free from damage. ***Please coordinate with the City of Stockton Police Department to assess how increased police presence could be Public investment to improve housing stock and increased housing availability. Despite the City of Stockton improvements, crime rates in the City are well above the statewide average.***

The City should develop clear factsheets for renters in several languages so that all are aware of the minimum requirements for a permitted rental housing unit and an on-line list of permitted rentals like the list that the City of Sacramento maintains.⁵

Housing Vouchers

HACCSJ administers several rental assistance programs. Separate waitlists are maintained for each program. Their programs include: Housing Choice Voucher Program, Public Housing, Project-Based Voucher Program, and 11 Site-Based Properties. According to the HACCSJ website⁶, the average wait time is contingent upon program turnover and funding, and could take 3-6 years. According to Affordable House Online⁷, the last time the waitlist for vouchers was open occurred between October to November 2018. Clearly residents in the City that are eligible for vouchers are not being served. There are 3611 households within the City of Stockton seeking housing with vouchers (70% of all County vouchers). Only 78% of issued vouchers were utilized as of October 2019. The Analysis of Impediments did not specify which of these 1150 resident households were seeking housing within the City of Stockton. Two reasons for this highly underutilized program listed were: 1) stigma and difficulty of finding a willing landlord who has a vacant unit that also meets quality standards and rental limits set by HUD. Central Valley Low-Income Housing (CVLIHC) began issuing bonus' in 2018 to rent to voucher holders which reported has increased the pool of willing landlords. The demand for vouchers and unit supply dramatically exceeds the available housing supply which results in an impediment to fair housing choice for lower-income residents.

The Sierra Club California has also recommended local affordable housing bonds to be passed by the voters by a simple majority, rather than a two-thirds majority¹. These funds could be used by the City of Stockton to develop a housing trust funds to supplement housing programs including housing vouchers. An analysis should be conducted to assess the willingness of Stockton property owners to fund affordable housing bonds.

Recommendations

Action 1: The City did a good job posting on the front page about the housing meeting earlier this month and leaving the posting there with the link to the City's Housing Page. Perhaps after the

⁵ <https://www.cityofsacramento.org/Community-Development/Code-Compliance/Programs/Rental-Housing/Registered-Rentals> Accessed 3.14.2020.

⁶ <http://www.hacsj.org/> Accessed 3.15.2020

⁷ <https://affordablehousingonline.com/housing-authority/California/Housing-Authority-of-the-County-of-San-Joaquin/CA024> Accessed 3.15.2020

event the language should have been updated with the comment due dates. ***Multiple Language Notices should be posted with links in Spanish and three of the other top languages spoken in Stockton so that a web-based translation service can be used by non-English speaking households.*** Persons with limited English proficiency (LEP) are identified as a protected class under the Fair Housing Act, as well as applicable California law.

Action 6: Financial literacy education should be added to the list of supportive services provided along with credit counseling, homebuyer counseling and education, and education on tenant rights and responsibilities for household entering or re-entering the rental market, such as formerly homeless households and those entering the homeownership market. Additionally, the City should enhance partnerships with Stockton Unified which through it's School for Adults has well used programs associated with learning English and earning a high school diploma or equivalent, along with various job skill classes.

Action 9: When working with financial institutions to encourage marking of financial serves to all segments of the community consider adding a rehabilitation subsidy for lenders of home equity or second loans necessary for home rehabilitation belonging to lower income homeowners so that the housing stock can be maintained, avoiding code enforcement actions so common in areas with a high proportion of older homes.

Action 10: Pursue a comprehensive update of the City's development impact fees, including the Capital Facilities Fees and Community Development Department fees. The fees charged are to be commensurate with the impact and sufficient to offset departmental costs. Perhaps under certain circumstances the City might consider using some HUD funds to partially fund certain City fees and utility fees to help improve the success of various projects fulling HUD's mission. We understand that a new approach will be implemented that sets up "districts" in the City having different fees. Please add the Delta-Sierra Group to the list of interested parties when developing future housing plans, and when the comprehensive update of the Community Development Department fees and Capital Facility Fees study results will be discussed or presented.

Action 12: Work with local and regional public transportation service provided to expand and enhance access connections between lower income neighborhoods such as south Stockton employment centers not well served by public transit. The DSG participates in the San Joaquin County Council of Government Citizen's Advisory Committee and activity advocates for transportation improvements for our lower income residents. We strongly support efforts of the City to improve the livability of all areas of our community.

Thank you for considering our comments on these important housing plans. The Delta Sierra Group welcomes opportunities to discuss our concerns regarding Stockton housing programs.

Sincerely,



Mary Elizabeth M.S., R.E.H.S.
Delta-Sierra Group Conservation Chair
Sierra Club

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	410	220	115	150	895	25	35	20	10	90
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	310	345	180	165	1,000	55	75	150	60	340
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,005	1,075	860	370	3,310	50	175	455	390	1,070
Housing cost burden greater than 50% of income (and none of the above problems)	8,005	4,300	884	100	13,289	1,730	1,640	1,445	485	5,300
Housing cost burden greater than 30% of income (and none of the above problems)	880	3,310	3,620	1,230	9,040	365	490	2,060	1,435	4,350
Zero/negative Income (and none of the above problems)	745	0	0	0	745	375	0	0	0	375

Table 8 – Housing Problems Table

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,395	4,165	2,660	11,220	665	800	1,580	3,045
Large Related	1,510	1,750	725	3,985	320	400	765	1,485
Elderly	1,380	1,485	760	3,625	900	880	865	2,645
Other	3,240	1,710	969	5,919	320	225	510	1,055
Total need by income	10,525	9,110	5,114	24,749	2,205	2,305	3,720	8,230

Table 10 – Cost Burden > 30%

Data Source: 2011-2015 CHAS