2023-2031 HOUSING ELEMENT

CITY OF RIVERBANK

2nd HCD Review Draft

June 2025

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SECTION I
Introduction

A. PURPOSE OF THE HOUSING ELEMENT

The State Legislature has declared that the provision of decent housing in a suitable living environment is of the highest priority (Government Code Section 65580). The Legislature has determined that local governments are responsible for facilitating improvements and the development of housing to meet the housing needs of all economic segments of the community while considering other fiscal, environmental, and community goals set forth in the General Plan. To address these goals, the City's Housing Element represents a nine-year program to conserve, improve, and develop housing in the community. Regional growth for the area is projected from June 30, 2023, to December 31, 2031. This 8-year period will be used to show the City's plan to accommodate its share of the regional housing needs.

1. Substantive Requirements

To meet substantive requirements, the Riverbank 2023-2031 Housing Element contains:

- Identification and analysis of existing and projected housing needs for all income levels, including an inventory of resources and constraints.

- An inventory of land suitable for residential development including vacant sites, and sites having potential for redevelopment.

- Revised housing goals, policies, and quantified objectives reflecting an updated housing needs analysis. These will be incorporated into a new schedule of actions to meet the goals and policies of the City's Housing Element during the planning period.

2. Procedural Requirements

The City must consider guidelines adopted by the State Department of Housing and Community Development (HCD) when undertaking revision of the Housing Element. The City will submit a draft of the revised Housing Element to HCD for review at least 90 days prior to formal adoption. The City must amend the draft Housing Element, taking into consideration HCD's findings, or make findings as to why the City believes it is in substantial compliance with the law.

3. Relationship to the General Plan

The City Housing Element is one of seven mandated elements of the General Plan. State requirements for the content of the Housing Element are more specific than other parts of the General Plan, and all parts of the General Plan must be internally consistent.

Local planning actions involving zoning, subdivision approval and redevelopment must be consistent with the City's Housing Element. The Housing Element is consistent with the City of Riverbank's general plan land use designations, as well as with the overall theme of the general plan. These highlight balance among housing types, among economic sectors, in transportation mode choices, and between housing and jobs. Consistency with the general plan will be maintained by evaluating the consistency of proposed housing policies with all other general plan elements. When any element of the General Plan is amended, the City will review the Housing Element and if necessary, amend it to ensure continued consistency among elements. For continued consistency between the Housing Element and other Elements of the General Plan, Program 5.1d has been added to the 2023-2031 Housing Element, requiring the City to provide for public engagement and discussion in conjunction with the State requirement for written review of the General Plan (per Government Code §65400). Additional actions include the maintenance of the Draft General Plan Housing Element Review on the City's website annually and to develop an evaluation matrix to determine the consistency between the Housing Element policies and programs and the other Elements of the General Plan.

4. State Law Requirements

The California Legislature adopted requirements in 1980 for the contents of Housing Elements. Among these legislative requirements is the mandate that:

> "The Housing Element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing....The Housing Element shall make adequate provisions for the existing and projected needs of all economic segments of the community."

This Housing Element serves two main purposes which are based on the legislative requirements mentioned above. First, it contains information describing the City of Riverbank's residents and their homes in sufficient detail to evaluate current and future housing needs. Second, the Element contains recommended policies and programs aimed at meeting the identified housing needs.

Specifically, the Housing Element must contain the following pursuant to Section 65583 of the Government Code:

(a) An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs, including:

1) Analysis of population and employment trends and quantification of the existing and projected housing needs for all income levels, including extremely low-income households;
2) Analysis and documentation of household/housing characteristics;
3) Inventory of land suitable for residential development;

4) Identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use permit or other discretionary permit;
5) Analysis of potential and actual government constraints;
6) Analysis of potential and actual non-governmental constraints;
7) Analysis of special housing needs (including homeless needs);
8) Analysis of opportunities for energy conservation; and
9) The preservation or replacement of dwelling units in subsidized housing projects which are affordable to low-income households, and which may convert to market-rate rents.
10) Affirmatively further fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2.

(b) A statement of the community's goals, quantified objectives, and policies relative to the maintenance, improvement, and development of housing. The total housing needs identified in (a) may exceed the available resources and the community's ability to satisfy those needs.

(c) A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available, and the utilization of moneys in a low- and moderate-income housing fund of an agency if the locality has established a redevelopment project area pursuant to Community Redevelopment Law.

(d) State Law Relationship to City of Riverbank's Critical Housing Issues

Among the provisions of California Housing Element Law are requirements that:

1) The City adopt, as a minimum goal, a share of the projected regional growth in lower- and moderate-income households as determined by the council of governments operating within the region (Stanislaus Council of Governments—StanCOG).

2) Financial resources must be identified that can make the construction of lower- and moderate-income households feasible; and,

3) Existing housing, affordable to lower- and moderate-income households be conserved, especially Federally or State-subsidized housing that may convert to market-rate housing within the time frame of the housing element.

These requirements of State law address the most critical effects of the public actions that the City is pursuing.

To date, the City has pursued a market-based strategy to meet its residents' housing needs. The City has designated lands for diverse types of housing at several density levels, including land for multi-family housing, which could meet a portion of the lower- and moderate-income housing needs. The City does not require developers to construct housing at the maximum allowed density.

Market decisions made by individual developers have traditionally determined timing and types of housing constructed. The City of Riverbank cooperates with private and/or non-profit developers interested in building affordable housing projects and helps them to identify economic incentives and government subsidies. The City has also begun to consider requesting that new developments include mix of housing types, including multi-family housing, in order to make up for the lack of such housing in the current inventory.

5. Regional Nature

The provision of adequate housing is a regional problem, and the City of Riverbank cannot implement a housing program without recognizing how land use and transportation decisions made by other jurisdictions affect the City's regional share of the area-wide housing needs. Conversely, land-use actions taken by the City may have extra-territorial effects which should be recognized. Because of the regional nature of housing needs in the greater Stanislaus area, the City's housing program requires coordination with other agencies.

B. METHODOLOGY

The Housing Element Update has included updated statistical data reported in the 2020 Census, StanCOG's Regional Housing Needs Allocation Report, State Department of Finance data, the State of California Economic Development Department, the Stanislaus Economic Development and Workforce ALLIANCE, and other pertinent housing and technical reports.

The existing 2014-2023 City of Riverbank Housing Element was an update to the 2009-2014 Housing Element. The analysis in the 2014-2023 Housing Element relied primarily on 2010 U.S. Census data. The 2023-2031 Housing Element Update will be based on the 2020 Census data, while at the same time, every attempt will be made to include newer census data from other reliable sources such as Employment Development Department (EDD) statistics on jobs and homelessness, Department of Finance (DOF) estimates and projections on population and housing and information from the U.S. Department of Housing and Urban Development (HUD).

The data for Riverbank is presented whenever possible, alongside comparable data for Stanislaus County and the State of California. This facilitates an understanding of Riverbank’s characteristics by illustrating how the City is similar to, or differs from, the

county and state in various aspects related to demographic characteristics and housing conditions and needs.

C. PUBLIC PARTICIPATION

State law requires cities and counties to make a diligent effort to achieve participation from all segments of the community in preparing a Housing Element. Section 65583(c)(6) of the California Government Code specifically requires that "The local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the program shall describe this effort."

The diligent effort required means that local jurisdictions must do more than issue the customary public notices and conduct standard public hearings prior to adopting a Housing Element. State law requires cities and counties to take active steps to inform, involve, and solicit input from the public, particularly low-income and racial and ethnic households that might otherwise not participate in the process.

To meet the requirements of state law, Riverbank completed the public outreach and encouraged community involvement, summarized below, and described herein.

- Stakeholder Consultations
- Planning Commission, City Council, and Community Workshops
- Online Community Survey
- City Council Presentations
- Planning Commission and City Council Meetings

1. Stakeholder Consultations

To ensure that the City solicits feedback from all segments of the community, a consultation meeting was conducted with local builders, service providers and other stakeholders who represent different socioeconomic groups.

On September 11, 2024, stakeholders were invited to participate in a meeting to discuss housing issues in the City of Riverbank. The following stakeholders were invited to participate:

Residential Developers

- DMG Development / FCB Homes
- KB Home
- DR Horton
- LGI Homes
- McRoy Wilbur Communities
- Browman Development Company
- Windward Pacific Builders
- Fitzpatrick Homes

- Florsheim Homes
- Bright Development
- Signature Homes
- Chaparral-Pacific Development
- Self-Help Enterprises
- Visionary Home Builders

Housing Service Providers

- Stanislaus County Habitat for Humanity
- Stanislaus County Affordable Housing Corp.
- Building Industry Association of the Greater Valley
- Stanislaus Regional Housing Authority
- California Rural Legal Assistance
- Area Agency for Housing
- Center for Human Services
- Central Valley Opportunity Center
- Project Sentinel: Modesto Office
- Community Housing and Shelter Services
- Haven Women's Center of Stanislaus
- Olivia Arambula - Realtor

The stakeholders were asked the following questions:

1. What are the top housing issues that should be addressed in our community?
2. What challenges do you face in developing housing in our community?
3. What can the City of Riverbank do to facilitate housing development?
4. What housing-related activities should the City prioritize?

Developers expressed concern with the feasibility of developing multi-family housing projects consisting of less than 50 units. They encourage the City to amend development standards that would accommodate a reduced street width, a reduction in common open space, smaller lots, allowing duets/duplex units. They expressed support for mixed use zoning that allow horizontal mixed development in addition to vertical mixed development. They request increased flexibility with density ranges, which helps with financial viability. They requested minimizing required land use entitlements and allow development by right. These comments were reflected in the analysis in the Housing Element in Sectio VII, *Housing Production Constraints* and Appendix D. Program 1.1a, *Adequate Sites for RHNA and Rezone Program*, stipulates that sites rezoned be subject to the provisions pursuant to Government Code Section 65583.2(i) and Program 3.1j, *Amendments to the Riverbank Municipal Code and Specific Plans* includes amending the open space requirement in for the Multiple Family Residential District R-3 Zone to clarify that the open space requirement shall apply to multiple residential uses of five (5) or more dwellings and clarify playground/open space requirements.

2. Planning Commission Workshop

The City held a Public Workshop at a regularly scheduled Planning Commission meeting on February 20, 2024. Public notice of the workshop was provided through the City's website and an ad placed in the Riverbank News.

The purpose of this workshop was to provide a presentation on the City's Housing Element, the update process, new State laws affecting preparation of the Housing Element, and to solicit public comment on various housing questions and concerns. During the Public Workshop, the following issues/comments were discussed:

- Housing Element purpose and process of updating;
- Availability of various types of housing;
- Methodology of the Regional Housing Needs Allocation; and
- Housing Element contents and requirements per State Housing Law.

Comments received during the Public Workshop have been included in various sections of the Housing Element, including but not limited to, the Site Inventory and how the City can accommodate the RHNA, availability of Housing Grants, and Housing Law requirements.

3. City Council Presentation

On March 12, 2024, Staff made a presentation to City Council regarding the Housing Element Update. The presentation provided an overview of the Housing Element Update process, new State Housing Laws, the Regional Housing Needs Allocation, Site Inventory methodology, etc. The public were invited to participate in this discussion.

4. City Council-Planning Commission Public Workshop

On July 31, 2024, a joint City Council-Planning Commission Public Workshop was held at the Riverbank Community Center at 3600 Santa Fe Street. Advertisements for the Public Workshop included the following:

- Public Notice published in the Riverbank Newspaper;
- Advertisements on the City's Instagram and Facebook Page;
- Posting a Public Workshop Flyer at City Hall North and South, the Post Office, and Community Center; and
- Reminders of the Workshop at Planning Commission and City Council meetings prior to the Workshop date.

The Public Workshop was attended by four (4) members of the City Council, three (3) members of the Planning Commission, and eight (8) members of the public. The intent of the Public Workshop was to provide an overview of the Housing Element and RHNA process and to solicit input from the public regarding housing needs and constraints, housing sites inventory and opportunity sites, and housing programs. The Public Workshop was available in English and Spanish.

Staff created stations and asked for input from the public on the City's housing needs and constraints, types of housing needs and where this housing can be developed, housing opportunity sites (e.g., candidate sites for rezone), and input on existing Policies and Programs from the 2014 -2023 Housing Element. A series of maps were presented to the public, including the Vacant and Underutilized Site Inventory and Candidate Sites for rezone. The public was asked to rank the candidate sites via stickers on a spreadsheet that corresponded to the sites on the map.

Feedback included several topics related to housing, including, how the City can: increase housing stock for all affordability levels, address inclusionary housing practices, how to become compliant with Housing Element Law, and increase participation through community outreach. Lastly the public expressed interest in creating an inclusionary housing ordinance and expanding the opportunities for first time home buyers.

Photographs of the Public Workshop are included in Appendix G.

5. Online Community Survey

On June 21, 2024, the City launched a Housing Survey requesting feedback on the state of local housing which remained open until August 13, 2024. A press release was sent out notifying the community of the survey. The Housing Survey was made available in English and Spanish.

There were 77 survey responses, 2 of which were completed in Spanish (only two percent of the responses). Five (5) additional surveys were completed during the July 31, 2024, Public Workshop. Among the respondents, approximately 66 percent live in Riverbank, 10 percent live and work in Riverbank, 14 percent live in Riverbank but are retired/do not currently work and 8 percent work in Riverbank but live somewhere else. Approximately 90 percent live in a Single-Family Home, 1 percent in an attached home (Townhouse, Duplex) and 4 percent in a multifamily home (apartment, condominium). Approximately 21 percent of respondents rent, and 74 percent own their home.

As it relates to the physical condition of the residence the respondents live in, approximately 37 percent responded that the physical condition of the residence is in excellent condition, 32 responded that residence shows signs of minor deferred maintenance, 2 percent responded that the residences need extensive major repairs or renovations, and 14 percent responded that the residence needs one or more major systems upgrades (e.g., new roof, windows, electrical, plumbing, HVAC system, etc.).

When asked what issues are preventing you from owning a home at this time, 18 percent responded that they cannot find a home within my target price range in Riverbank. When asked about the main housing challenges in Riverbank, 72 percent responded that the cost of quality housing is too high, and 54 percent responded that there are not enough well-paid jobs. Additionally, when asked about the most urgent housing issues in Riverbank, 61 percent responded with affordability.

Additional comments:

- The best strategy to produce housing is to improve City processes (further streamlined application process and checklists, pre-application meetings, handouts, improved website design and navigation to find needed materials, etc.).
- The best way to assist people who are experiencing homelessness is to provide housing and supportive services (i.e., assistance with addition, mental health, recovery, displacement, and/or more transitional/emergency housing).

- Provide more housing programs to expand affordable housing inventory through new housing projects.

The Online Community Survey results are included in the Housing Element in Appendix G.

6. Project Website

A dedicated website (https://www.riverbank.org/652/Housing-Element) is a clearinghouse for all information related to the Housing Element Update. Community members can visit the site to access all public materials; learn about the latest project updates and opportunities to get involved; sign up for email updates; and submit comments via email to riverbankhousing@riverbank.org. The project team also leverages the City's social media presence on Instagram and Facebook to promote the website, share updates, and highlight upcoming opportunities for involvement, including the Community Survey and workshops.

7. Progress Update meetings to the Planning Commission and City Council

On September 17, 2024, a Planning Commission Public Hearing meeting was held to present public comments received at the July 31, 2024, community workshop and at the September 11, 2024, Stakeholders meeting. The public was invited to share additional comments on Draft Housing Element prior to the formal 30-day public review of the draft Housing Element.

On September 24, 2024, a City Council meeting was also held to present public comments received at the July 31, 2024, community workshop and at the September 11, 2024, Stakeholders meeting. The public was invited to share additional comments on Draft Housing Element prior to the formal 30-day public review of the draft Housing Element.

On May 27, 2025, a City Council meeting was held to provide a progress update on the Housing Element Update and addressing comments received from HCD. The public was invited to provide comments on the Housing Element prior to resubmittal to HCD.

8. Planning Commission and City Council Meetings

On October 15, 2024, a Planning Commission meeting was held to present the Draft Housing Element and receive feedback and comments prior to submittal to HCD.

On November 12, 2024, a City Council meeting was held to present the Draft Housing Element and receive authorization to submit the Draft Housing Element to HCD for a 90-day compliance evaluation with State law.

8. Public Comments

The City received ongoing public comments during the drafting of the Housing Element. All comments received were considered. Public comment themes included, but were not limited to, the following topics:

- Increasing low- and moderate-income housing production;

- Concerns related to Housing Element Law compliance;
- Availability of sites for low- and moderate-income;
- Options for inclusionary housing; and
- Development outside of City Limits and within the City's Sphere of Influence.

All comments received were considered and used to inform the sites analysis and assessment of fair housing issues, and goals, policies, and programs.

9. Notice of Draft Housing Element

Per California Government Code Section 65585, the Draft Housing Element was made available for public comment for at least 30 days, from October 15, 2024, to November 142, 2024. The Draft was made available on the City's website and was noticed to residents through the same methods as the Planning Commission and City Council meetings. The following comments were received eleven (11) comment letters during the public review period, which ended on November 14, 2024. The comment letters are included in this Housing Element in Appendix L. The City will continue to accept and review any comment letters received during the HCD review process and suggest any appropriate revisions to the Draft Housing Element.

Based on public comments received, the City revised the Housing Element. Revisions were made to various Sections of the Housing Element. Additional corrections and updates were made to resolve typographical errors, formatting and data discrepancies. Additionally, updates were made to infrastructure information in Section II, *Household and Employment Characteristics* and VII, *Housing Production Constraints* to be consistent with recent studies. The City revised the Draft Housing Element in response to public comment and City Council direction and published a track changes version with the HCD Review Draft 6th Cycle Housing Element on December 2, 2024, on the project website in conjunction with submitting the Housing Element to HCD for the mandated 90-day compliance review with State laws.

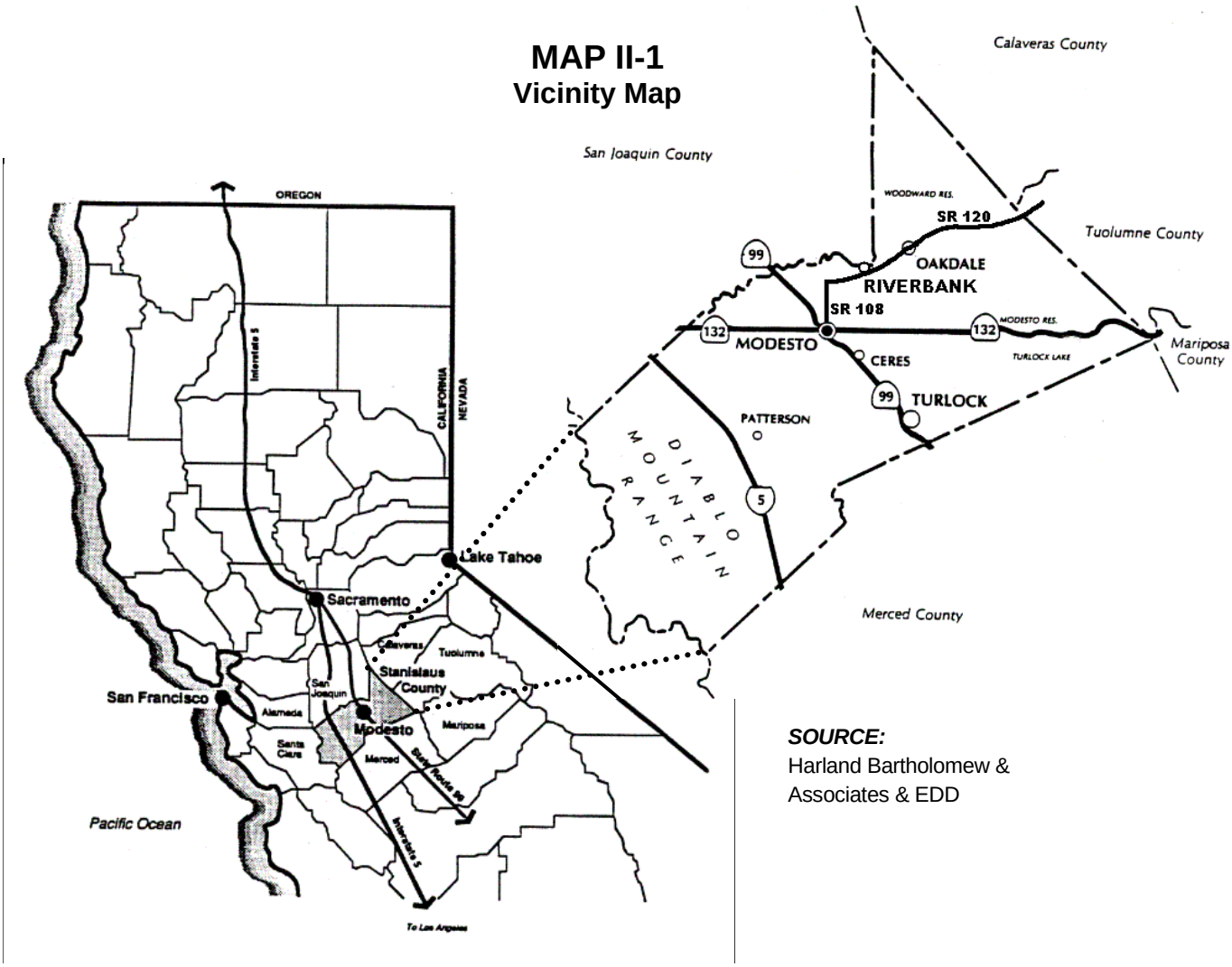
SECTION II
Household and Employment Characteristics

A. COMMUNITY PROFILE

Riverbank is located in Stanislaus County, northeast of Modesto (see Figure II-1). From the early 1930's up through the 1950's, Riverbank experienced significant immigration of families from the Mid-west and Mexico. These newcomers were drawn to the area by the promise of jobs in agricultural and related industries, as well as the possibility of finding low-cost housing.

The City of Riverbank was incorporated in 1922 and consisted of 340 acres of land area. In 1930, Riverbank had a population of 803 people. From its incorporation in 1922 until 1986 Riverbank was a small, agricultural, service town housing residents who worked within or near the City.

MAP II-1
Vicinity Map



SOURCE:
Harland Bartholomew & Associates & EDD

B. POPULATION TRENDS / GROWTH RATE

In 2013, the population in Riverbank was 23,100 according to the Department of Finance. Using the same source, in 2024, the population was 25,006. Based on these numbers, the growth rate for the 2013-2023 is just below 7% (see Table II-1, Population and Population Growth Rates 2013-2023).

Beyond 2024, projections indicate that the City of Riverbank will grow to approximately 30,048 by the year 2030 (see Table II-2 Historical and Projected Household Population - 2020-2050).

TABLE II-1
Population and Population Growth Rates
City of Riverbank – 2013-2023

YEAR	POPULATION	ANNUAL POPULATION CHANGE	ANNUAL % POPULATION CHANGE
JANUARY 2013	23,100	-	-
JANUARY 2014	23,243	143	0.62%
JANUARY 2015	23,741	498	2.14%
JANUARY 2016	24,094	353	1.49%
JANUARY 2017	24,566	472	1.96%
JANUARY 2018	24,856	290	1.18%
JANUARY 2019	25,041	185	0.74%
JANUARY 2020	25,133	92	0.37%
JANUARY 2021	24,825	-308	-1.23%
JANUARY 2022	24,670	-155	-0.62%
JANUARY 2023	24,695	25	0.10%
JAN. 2013-2023	-	1,595	6.~~90~~75%

SOURCE: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2013-2023. Sacramento, California, May 2023.

Stanislaus County has two population growth projections, one by Stanislaus Council of Governments (StanCOG) and the other by the Department of Finance. StanCOG's growth projection for the County beyond 2020 up to 2050 is from 560,579 to 688,585 in population. The Department of Finance's growth projection for the same period is 553,706 to 593,396 in population, along with a projection out to 2060, which is 609,615 (see Table II-3 Historical and Projected Household Population - Stanislaus County 2020-2050).

As shown in Tables II-2 and II-3, population growth is anticipated to continue. Most of Stanislaus County is affected by Bay Area commuters; Riverbank has also been experiencing growth from this group. High population growth rates throughout Stanislaus County have placed significant stress on infrastructure. Thus far, the City of Riverbank has utilized an unrestricted growth policy which allows market demand to dictate housing construction and population growth. ~~The closing of Gangi Brothers Cannery has resulted in available sewer facilities for the City to sufficiently serve a population of approximately 60,000.~~

Over the past decade, household size in Riverbank has had a slight decrease. In 2020, the average household size was 3.37 persons. In 2023, it was 3.29 persons per household. This minor change is not anticipated to affect the number of housing units needed to house a given population. (See Table II-4, Persons per Occupied Housing Units 2020-2023)

TABLE II-2
Historical & Projected Household Population, City of Riverbank – 2020-2050

YEAR	CENSUS	STANCOG
2020	24,865	24,926
2025		28,223
2030		30,048
2035		31,684
2040		33,579
2045		35,934
2050		38,310

SOURCE: *CENSUS:* U.S Census Bureau, 2020 Census
STANCOG: 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Appendix J Regional Demographic Forecast

TABLE II-3
Historical & Projected Household Population, Stanislaus County - 2020-2050

YEAR	CENSUS	STANCOG	DEPT OF FINANCE
2020	552,878	560,579	553,706
2025		592,112	548,695
2030		609,579	558,565
2035		625,219	568,984
2040		644,296	577,523
2045		665,867	585,648
2050		688,585	593,396

SOURCE: *CENSUS*: U.S. Census Bureau, 2020 Census
STANCOG: 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Appendix J Regional Demographic Forecast.
DEPARTMENT OF FINANCE: State of California, Department of Finance, Report P-2A (County): State and County Total Population Projections, 2020-2060. Sacramento, California, July 2023.

TABLE II-4
Persons per Occupied Housing Units For Riverbank, Stanislaus County, and California - 2020 and 2023

DOF Estimates		Total	Single-family		Multi-family		Mobile Homes	Occupied	Persons Per Household
			Detached	Attached	2 to 4	5 Plus			
Riverbank									
Units	**2020**	7,493	6,398	262	159	386	288	7,312	3.37
%		100%	85.39%	3.50%	2.12%	5.15%	3.84%	97.58%	-
Units	**2023**	7,634	6,539	262	159	386	288	7,450	3.29
%		100%	85.66%	3.43%	2.08%	5.06%	3.77%	97.59%	**-**
Stanislaus County									
Units	**2020**	183,140	137,369	7,736	12,120	17,701	8,214	176,738	3.09
%		100%	75.01%	4.22%	6.62%	9.67%	4.49%	96.50%	-
	2023	185,622	139,018	7,752	12,166	18,456	8,230	178,597	3.02
%		100%	74.89%	4.18%	6.55%	9.94%	4.43%	96.22%	-
California									
Units	**2020**	14,392,140	8,286,214	1,035,121	1,123,356	3,412,136	535,313	13,475,623	2.86
%		100%	57.57%	7.19%	7.81%	23.71%	3.72%	93.63%	-
Units	**2023**	14,707,698	8,420,792	1,056,780	1,146,148	3,545,018	538,960	13,739,470	2.77
%		100%	57.25%	7.19%	7.79%	24.10%	3.66%	93.42%	-

SOURCE: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State – January 1, 2020-2023. Sacramento, California, July 2023

C. POPULATION CHARACTERISTICS (AGE AND ETHNICITY)

1. Age of Population

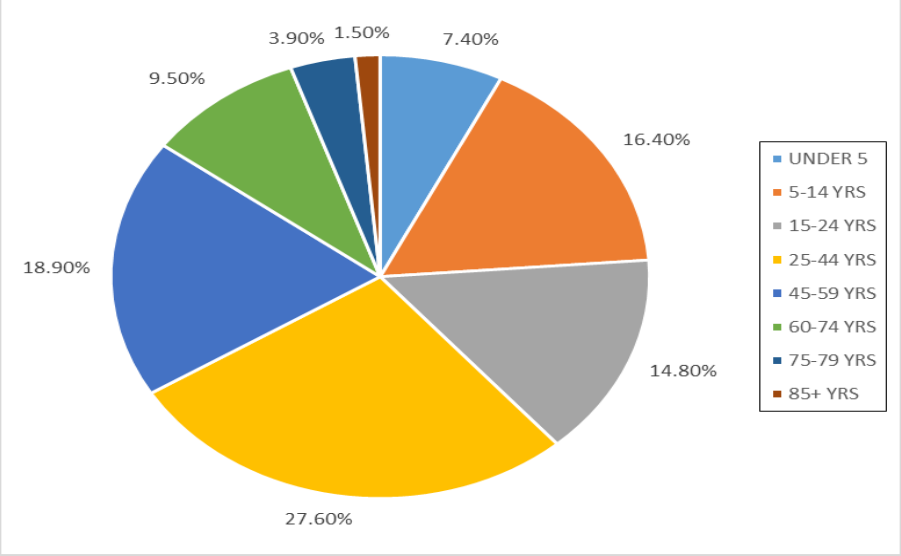
The age distribution for the City of Riverbank has remained relatively constant over the past ten years. There has been an increase in all the age groups except the population under 5 years. Also, the median age in the City of Riverbank increased from 31.0 years in 2010 to 33.3 years in 2020. (Also see Table II-7, Persons by Age and Sex)

TABLE II-5
Selected Age Groups
City of Riverbank - 2010 to 2020

	2010 Census		*2020 Census*	
AGE GROUP	#	% OF CITY POPULATION	#	% OF CITY POPULATION
< 5 YEARS	1,948	8.89%	1,821	7.40%
5 TO 14	3,866	17.05%	4,038	16.40%
15 TO 24	3,447	15.20%	3,651	14.80%
25 TO 44	6,633	29.25%	6,790	27.60%
45 TO 59	4,005	17.66%	4,650	18.90%
60 TO 74	1,958	8.63%	2,343	9.50%
75 TO 84	606	2.67%	961	3.90%
85 YEARS +	215	0.95%	369	1.50%
POPULATION	22,678	100.00%	24,623	100.00%

SOURCE: U.S. Census Bureau, 2010 Census, QT-P1: Age Groups and Sex; American Community Survey: S0101 Age and Sex, 2020

CHART II-1
Selected Age Groups
City of Riverbank - 2020



***SOURCE*:** American Community Survey: S0101 Age and Sex, 2020

2. Ethnic Groups

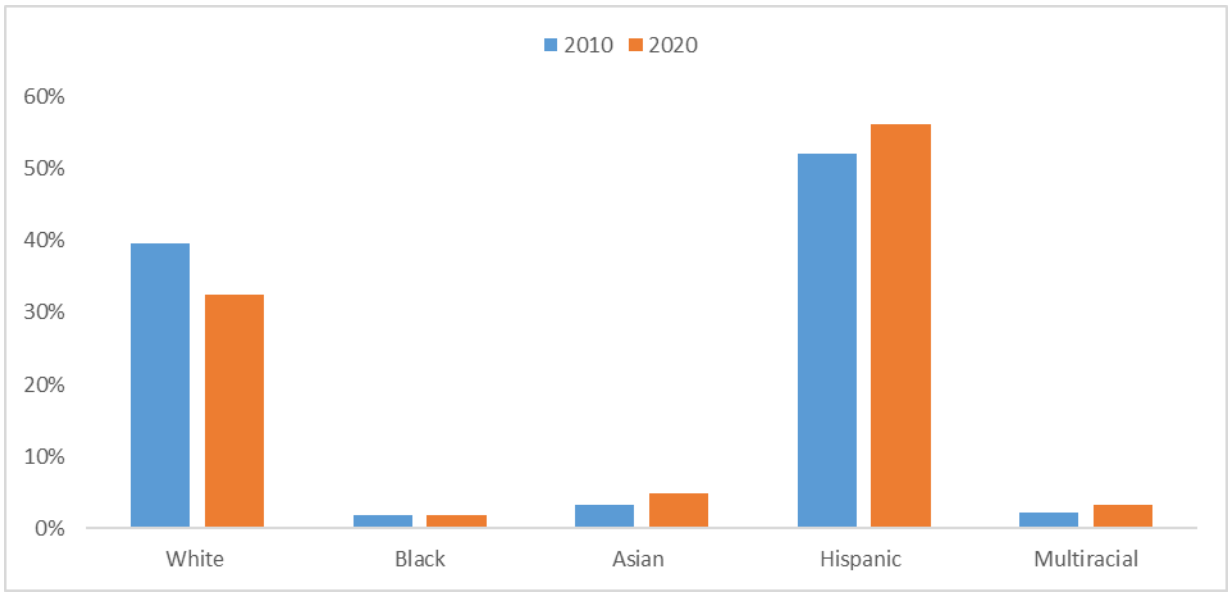
Table II-6, Persons by Race, indicates that the Hispanic population is the largest ethnic group in the City of Riverbank. The 2020 Census reports that the Hispanic or Latino population account for 56.14% of the population, greater than the white population at 32.56 percent. By comparison, California is approximately 40% of Hispanic origin, with Stanislaus County being the same at 49.4% of Hispanic origin, showing that Riverbank has a higher percentage of population which are of Hispanic origin.

TABLE II-6
Persons by Race
City of Riverbank – 2010 and 2020

RACE	2010	% OF TOTAL	2020	% OF TOTAL
WHITE	8,964	39.53%	8,095	32.56%
BLACK OR AFRICAN AMERICAN	410	1.81%	470	1.89%
AMER. INDIAN / ALASKAN NATIVE	129	0.57%	83	0.33%
ASIAN	733	3.23%	1,199	4.82%
NATIVE HAWAIIAN AND OTHER PACIFIC ISLANDER	81	0.36%	138	0.55%
OTHER RACE	34	0.15%	112	0.45%
HISPANIC OR LATINO (OF ANY RACE)	11,822	52.13%	13,958	56.14%
TWO OR MORE RACES	505	2.23%	810	3.26%%
TOTAL	**15,826**	**100%**	**24,865**	**100%**

SOURCE: U.S. Census Bureau, 2010 and 2020 Census, QT-PL, P2, and P9 Tables.

CHART II-2
Race and Ethnicity – 2010-2020



SOURCE: State of California, Department of Finance, Report P-1D and P-2D (Race): State and County Population Projections by Race/Ethnicity, 2020-2060. *Sacramento, California, July 2023.*

3. Gender

In 2010, the male and female populations in Riverbank were roughly equal. Males made up 49.83% and females made up 50.17% of the City's population. The percentage of males and females changed slightly in 2020, with the percentage of males decreasing to 48.4% and the percentage of females increasing to 51.6%.

TABLE II-7
Persons by Age and Sex
City of Riverbank – 2010, 2020, and 2022

AGE GROUP		2010 CENSUS		2020 CENSUS		2022 ESTIMATE	
		NUMBER	% OF TOTAL	NUMBER	% OF TOTAL	NUMBER	% OF TOTAL
UNDER 5	TOTAL	1,948	8.59%	1,821	7.40%	1,943	7.83%
	MALE	992	4.37%	907	3.68%	1,046	4.22%
	FEMALE	956	4.22%	914	3.71%	897	3.62%
5 TO 14	TOTAL	3,866	17.05%	4,038	16.40%	4,260	17.18%
	MALE	1,998	8.81%	1,928	7.83%	2,115	8.53%
	FEMALE	1,868	8.24%	2,110	8.57%	2,145	8.65%
15 TO 24	TOTAL	3,447	15.20%	3,651	14.83%	3,594	14.49%
	MALE	1,758	7.75%	1,901	7.72%	1,716	6.92%
	FEMALE	1,689	7.45%	1,750	7.11%	1,878	7.57%
25 TO 34	TOTAL	3,407	15.02%	3,500	14.21%	3,181	12.83%
	MALE	1,711	7.54%	1,725	7.01%	1,595	6.43%
	FEMALE	1,696	7.48%	1,775	7.21%	1,586	6.39%
35 TO 44	TOTAL	3,226	14.22%	3,290	13.36%	3,461	13.95%
	MALE	1,622	7.15%	1,728	7.02%	1,810	7.30%
	FEMALE	1,604	7.07%	1,562	6.34%	1,651	6.66%
45 TO 54	TOTAL	2,918	12.87%	3,141	12.76%	3,471	13.99%
	MALE	1,448	6.39%	1,695	6.88%	1,901	7.66%
	FEMALE	1,470	6.48%	1,446	5.87%	1,570	6.33%
55 TO 64	TOTAL	1,973	8.70%	2,517	10.22%	2,166	8.73%
	MALE	939	4.14%	970	3.94%	831	3.35%
	FEMALE	1,034	4.56%	1,547	6.28%	1,335	5.38%
65 TO 74	TOTAL	1,072	4.73%	1,335	5.42%	1,525	6.15%
	MALE	499	2.20%	587	2.38%	739	2.98%
	FEMALE	573	2.53%	748	3.04%	786	3.17%
75+	TOTAL	821	3.62%	1,330	5.40%	1,202	4.85%
	MALE	334	1.47%	477	1.94%	432	1.74%
	FEMALE	487	2.15%	853	3.46%	770	3.10%
CITY TOTAL		**22,678**	**100.00%**	**24,623**	**100.00%**	**24,803**	**100.00%**
	MALE	**11,301**	**49.83%**	**11,918**	**48.40%**	**12,185**	**49.13%**
	FEMALE	**11,377**	**50.17%**	**12,705**	**51.60%**	**12,618**	**50.87%**
MEDIAN AGE		*31.0*		*33.3*		*33.6*	

SOURCE: U.S. Census Bureau, 2010 Census, QT-P1, Age Groups and Sex: 2010; U.S. Census Bureau, 2016-2020, 2018-2020 American Community Survey, S0101, Age and Sex.

D. EMPLOYMENT TRENDS

1. City of Riverbank - Area Profile and Employment

The largest employer in Riverbank is the Riverbank Unified School District with 224 employees. In manufacturing, Silgan Containers, a metal food container manufacturer, is the largest manufacturing employer, at 90 employees. The current unemployment rate in Riverbank is 6.4% (Economic Development Department, Labor Market Info, Unemployment Rate and Labor Force, March 2024).

TABLE II-8
Top Employers – City of Riverbank, 2022

MANUFACTURING

COMPANY	PRODUCT TYPE	NUMBER OF EMPLOYEES
SILGAN CONTAINERS	METAL CAN CONTAINERS	90
MONSCHEIN INDUSTRIES	CABINET MANUFACTURER	75

NON-MANUFACTURING

COMPANY	PRODUCT TYPE	NUMBER OF EMPLOYEES
RIVERBANK SCHOOL DISTRICT	EDUCATION	224
KOHL'S DEPARTMENT STORE	RETAIL STORE	200
TARGET CORPORATION	GENERAL RETAIL STORE	185
HOME DEPOT	BUILDING SUPPLY	150
VALLEY WEST HEALTH	HEALTH CARE	100

SOURCE: Stanislaus County Comprehensive Economic Development Strategy– Riverbank Profile – 2022

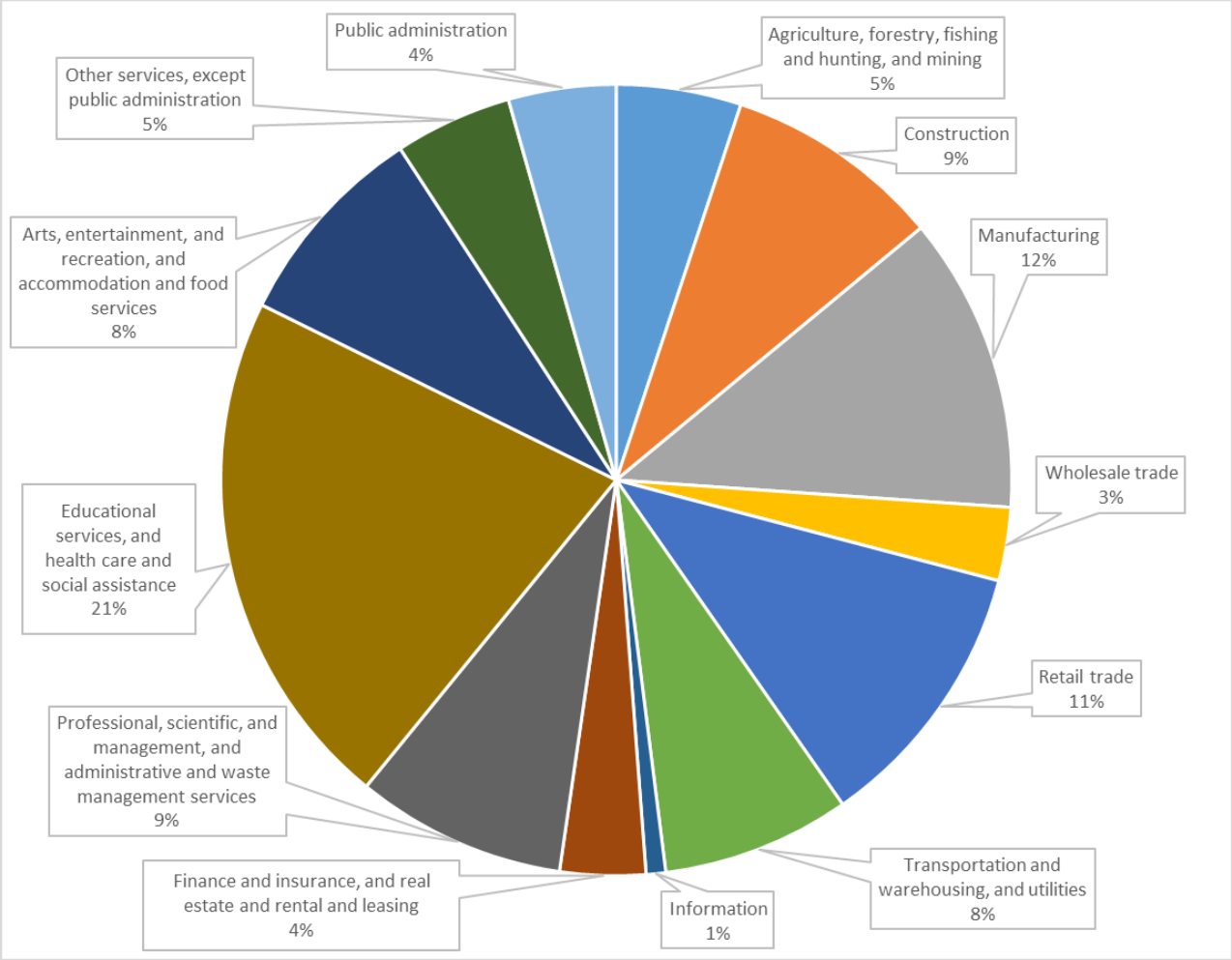
With the completion of the Riverbank Crossroads Regional Center and the anchoring of Target, Kohl's, Home Depot, SaveMart, Ulta and Beverages and More, Riverbank is now able to compete with the larger trade areas surrounding our community. Many small businesses have located in the shopping center to capture the exposure as well. In addition, with the approval and annexation of the Crossroads West Specific Plan, there are additional opportunities for regional serving retail, such as the ~~under-construction~~recently constructed and now open Costco Wholesale at the northwest corner of Claribel Road and Oakdale Road.

2. Stanislaus County - Area Profile and Employment

Agriculture is the mainstay of Stanislaus County's economy. Farmers in this County grow over 250 commodities and produce value added products which are shipped world-wide. Agriculture represents over $3.7 billion gross dollars and one-third of the county's jobs. Stanislaus County is the number six agricultural county in the state. Milk, almonds and poultry lead the county in gross farm revenue.

According to a statistical report prepared for December 2023 by the Economic Development Department (EDD), the civilian labor force in Stanislaus County included 244,700 employed. (EDD, Current Employment Statistics, January 19, 2024) An industry breakdown is shown in the figure below using American Community Survey data.

CHART II-3
Jobs by Industry – ACS 2018-2022



SOURCE: U.S. Census Bureau, 2018-2022 American Community Survey, DP-03

The EDD also reports that Stanislaus County (Modesto Metropolitan Statistical Area) will continue to experience economic expansion through 2030. Total employment, including Self-employment, Private Household Workers, Farm Employment and Non-Farm Employment in Stanislaus County is expected to grow 16 percent between 2020 and 2030. The overall growth will add 32,000 new jobs, bringing Stanislaus County's total employment to 232,400 by 2030. (EDD, Modesto Metropolitan Statistical Area, Stanislaus County, 2020-2030 Industry Employment Projections, May 2023)

Non-Farm Employment, 86 percent of total employment, is expected to grow 1.8 percent annually for the next ten years. About sixty percent of all new wage and salary jobs are forecasted to occur in Professional and Business Services (9.7 percent), Retail Trade (6.8 percent), Education and Health Services (23 percent) and Leisure and Hospitality (21.2 percent). (EDD, Modesto Metropolitan Statistical Area, Stanislaus County, 2020-2030 Industry Employment Projections, May 2023)

Leisure and Hospitality is the fastest growing major industry, growing at an annual rate of 4.2 percent. Other major industries growing faster than the overall county average of 1.8 percent annually are Clothing and Clothing Accessories Stores (3.3 percent), Educational Services (3.3 percent), Transportation, Warehousing, and Utilities (2.8 percent), Information (2.5 percent), and Wholesale Trade (2.4 percent).

Occupational projection numbers include self-employment, private household workers and farm employment for the period 2020 to 2030. The forecast projects:

- 32,000 new jobs from industry growth
- Over 2,000 jobs openings from Retail Trade
- About 3,000 job openings from Government

The top 50 occupations with the most job openings will generate approximately 62 percent (or 172,570) total job openings in Stanislaus County during the 2020-2030 period. Of the 50 occupations listed, 46 require only a year or less of experience, which is 88 percent of the total job openings. This includes entry level occupations such as Retail Salespersons, Cashiers, Combined Food Prep and Serving Workers, and Waiters and Waitresses with minimal pay. Higher-skilled and higher-paying occupations are those with an AA degree or higher like Registered Nurses, Teachers, and Managers. They are forecasted to have over 42,250 job openings.

The 50 fastest growing occupations are all expected to grow at an annual rate of 3 percent or more. About 86 percent of the fastest growing occupations require a year's experience or less. The 7 top paying occupations all have higher education requirements. Source: Economic Development Department, 2020-2030 Occupational Employment Projections, Modesto Metropolitan Statistical Area, Stanislaus County, May 2023.

TABLE II-9
Annual Average Wage and Salary Employment* - Stanislaus County
Historical – 2020, Forecast – 2030

INDUSTRY	HISTORICAL 2020	FORECASTS 2030	ABSOLUTE CHANGE 2020-2030
TOTAL, ALL INDUSTRIES	*200,400*	*232,400*	*32,000*
SELF EMPLOYMENT	*12,600*	*13,200*	*600*
PRIVATE HOUSEHOLD WORKERS	*200*	*200*	*0*
TOTAL FARM	*14,500*	*14,800*	*300*
TOTAL NON-FARM	*173,100*	*204,200*	*31,100*
MINING, LOGGING, AND CONSTRUCTION	9,800	11,400	1,600
MANUFACTURING	*21,200*	*23,000*	*1,800*
NON-DURABLE GOODS MANUFACTURING	15,800	17,200	1,400
FOOD MANUFACTURING	9,600	10,200	600
TRADE, TRANSPORTATION AND UTILITIES	*36,800*	*42,800*	*6,000*
WHOLESALE TRADE	*5,900*	*7,300*	*1,400*
RETAIL TRADE	*21,900*	*24,000*	*2,100*
FOOD AND BEVERAGE STORES	*4,600*	*5,100*	*500*
CLOTHING AND CLOTHING ACCESSORIES STORES	*1,200*	*1,600*	*400*
GENERAL MERCHANDISE STORES	*4,800*	*5,400*	*600*
TRANSPORTATION, WAREHOUSING, AND UTILITIES	*9,000*	*11,500*	*2,500*
INFORMATION	*800*	*1,000*	*200*
FINANCIAL ACTIVITIES	*5,100*	*5,800*	*700*
PROFESSIONAL AND BUSINESS SERVICES	*15,100*	*18,100*	*3,000*
ADMIN AND SUPPORT AND WASTE MGMT. AND REMEDIATION SERVICES	*8,100*	*10,000*	*1,900*
EDUCATION SERVICES (PRIVATE), HEALTH CARE, AND SOCIAL ASSISTANCE	*34,600*	*41,600*	*7,000*
EDUCATION SERVICES (PRIVATE)	1,200	1,600	400
HEALTH CARE AND SOCIAL ASSISTANCE	*33,400*	*40,000*	*6,600*
LEISURE AND HOSPITALITY	15,800	22,400	6,600
OTHER SERVICES	5,100	6,300	1,200
GOVERNMENT	28,800	31,800	3,000
FEDERAL	900	900	0
STATE AND LOCAL	28,000	30,900	2,900

*Employment and projections contained in these tables are considered estimates. Annual average industry detail may not add up to totals due to independent rounding. Government data include all civilian government employees regardless of the activities in which they are engaged.

SOURCE: Employee Development Department Industry Employment Projections, Modesto Metropolitan Statistical Area, Stanislaus County, 2020-2030

3. Unemployment

The County's unemployment trends can also be a strong indicator of the future economic development in the County. Monthly unemployment trends rose drastically from 2019 to 2023, going from an annual average of 6.1% to 11.0%. The County has been able to recover to pre 2019 unemployment rates, with unemployment decreasing in 2022. Unemployment rates tend to drop significantly during the peak harvest months of July through October. Table II-10, Monthly Unemployment Rate, Stanislaus County 2015-2023, illustrates the unemployment trends in Stanislaus County.

Unemployment in Stanislaus County has seasonal fluctuations; however, the 2022 average unemployment rate was 5.4%. In September 2023, 14,400 persons were unemployed. The preliminary unemployment rate for September 2023 is 5.9%.

TABLE II-10
Monthly Unemployment Rate
Stanislaus County: 2015- September 2023

MONTH	2015	2016	2017	2018	2019	2020	2021	2022	2023
JANUARY	11.1%	9.7%	9.2%	7.5%	7.5%	6.8%	10.0%	7.0%	6.5%
FEBRUARY	11.0%	9.7%	9.1%	7.4%	7.0%	6.5%	9.9%	6.4%	6.8%
MARCH	10.9%	10.0 %	8.8%	7.4%	7.0%	9.4%	9.6%	5.9%	7.0%
APRIL	10.1%	9.2%	8.1%	6.6%	6.1%	17.5%	9.4%	5.3%	6.2%
MAY	9.6%	8.1%	7.3%	6.0%	5.6%	15.9%	8.6%	4.8%	6.4%
JUNE	9.9%	9.0%	7.8%	6.9%	6.4%	13.5%	9.5%	5.5%	6.8%
JULY	9.5%	8.5%	7.6%	6.8%	6.4%	13.0%	8.7%	5.3%	6.6%
AUGUST	8.5%	7.8%	6.9%	6.0%	5.8%	10.7%	8.1%	5.1%	6.4%
SEPTEMBER	7.9%	7.4%	6.1%	5.3%	4.9%	10.2%	6.9%	4.5%	5.9%
OCTOBER	8.4%	7.8%	6.1%	5.5%	5.1%	9.3%	6.8%	4.9%	N/A
NOVEMBER	8.8%	7.9%	6.5%	5.8%	5.5%	9.4%	6.3%	5.3%	N/A
DECEMBER	8.9%	8.5%	6.9%	6.5%	5.9%	9.7%	6.1%	5.3%	N/A
ANNUAL AVERAGE	**9.6%**	**8.6%**	**7.5%**	**6.5%**	**6.1%**	**11.0%**	**8.3%**	**5.4%**	**-**

SOURCE: Economic Development Department, California Labor Market Information, Historical Unemployment Rates (Labor Force) in Stanislaus County, 2015 – September 2023 (Preliminary)

E. JOBS/HOUSING BALANCE

It is desirable, at least theoretically, for a community to have a balance of jobs and housing within a specific area in order to achieve several commonly held goals such as the following:

a. A reduction in vehicle miles traveled (for home-work-home trips).
b. A reduction in air pollution (less travel time).
c. An improvement to the quality of life (more time for family and recreation).
d. An increased sense of community.

The ideal ratio of jobs to housing units is expressed as 1:1, one job to one housing unit. Recent trends toward two wage earners per family indicate that a ratio of 2:1 might be more appropriate.

In order to plan for the provision of housing which matches the financial capabilities of the existing jobs in an area, or to encourage the types of employment opportunities that match skills of the persons who presently reside in the area, it is necessary to collect, quantify, and classify this type of information.

SECTION III
Housing Stock Characteristics

A. EXISTING HOUSING STOCK

The City of Riverbank had 7,634 housing units as of January 1, 2023. Detached single-family homes continue to make up the bulk of the City's housing stock (86%). Comparison of trends from 2020 to 2023 indicates a 2.2% (141 housing units) increase of single-family, detached units. During the same period, multi-family units stayed consistent (See Table III-1). There was a smaller increase in the number of owner-occupied units versus renter-occupied units in Stanislaus County by 2022 (See Table III-2). Comparison of tenure trends in Riverbank from 2010 to 2022 indicates a slight increase single-family, detached unit (10.3% increase) (See Table III-3).

TABLE III-1
Housing Stock by Type and Vacancy
For Riverbank, Stanislaus County, and California - 2020 and 2023

DOF Estimates		Total	Single-family		Multi-family		Mobile Homes	Occupied	Vacant %
			Detached	Attached	2 to 4	5 Plus			
Riverbank									
Units	**2020**	7,493	6,398	262	159	386	288	7,312	2.4%
%		100.00%	85.39%	3.50%	2.12%	5.15%	3.84%	97.58%	-
Units	**2023**	7,634	6,539	262	159	386	288	7,450	2.4%
%		100.00%	85.66%	3.43%	2.08%	5.06%	3.77%	97.59%	**-**
Stanislaus County									
Units	**2020**	183,140	137,369	7,736	12,120	17,701	8,214	176,738	3.5%
%		100.00%	75.01%	4.22%	6.62%	9.67%	4.49%	96.50%	-
Units	**2023**	185,622	139,018	7,752	12,166	18,456	8,230	178,597	3.8%
%		100.00%							-
California									
Units	**2020**	14,707,698	8,420,792	1,056,780	1,146,148	3,545,018	538,960	13,739,470	6.6%
%		100.00%	57.25%	7.19%	7.79%	24.10%	3.66%	93.42%	-
Units	**2023**	14,392,140	8,286,214	1,035,121	1,123,356	3,412,136	535,313	13,475,623	6.4%
%		100.00%	57.57%	7.19%	7.81%	23.71%	3.72%	93.63%	-

SOURCE: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State – January 1, 2020-2023, Sacramento, California, May 2023

TABLE III-2
Tenure by Unit Type
Stanislaus County and California – 2010 and 2022

Owner-Occupied Households				
	2010	**2022**	**Change**	**% Change**
Stanislaus County	101,826	106,359	4,533	4.5%
California	7,112,050	7,407,361	295,311	4.2%
Renter-Occupied Households				
	2010	**2022**	**Change**	**% Change**
Stanislaus County	62,015	69,388	7,373	11.9%
California	5,280,802	5,908,461	627,659	11.9%

SOURCE: U.S. Census Bureau, 2006-2010, 2018-2022 American Community Survey, B25032, Tenure by Units in Structure.

TABLE III-3
Tenure by Unit Type
City of Riverbank - 2010 and 2022

	HOUSING CATEGORY	TOTAL HOUSING UNITS*	TOTAL OCCUPIED UNITS	VACANCY (%)	OWNER OCCUPIED	% OF TOTAL OCCUPIED	RENTER OCCUPIED	% OF TOTAL OCCUPIED
2010	SF DETACHED	5,831	5,488	5.9%	4,381	75.1%	1,107	19.0%
	SF ATTACHED	240	195	18.8%	116	48.3%	79	32.9%
	2 UNITS	90	90	0%	10	11.1%	80	88.9%
	3 OR 4 UNITS	64	64	0%	11	17.2%	53	82.8%
	5 OR MORE UNITS	276	199	27.9%	0	0%	199	72.1%
	MOBILEHOME/TRAILER	284	260	8.5%	213	75.0%	47	16.5%
	CITY TOTALS	6,785	6,296	7.2%	4,731	75.1%	1,565	24.9%
2022	SF DETACHED	6,429	6,315	1.8%	4,881	75.9%	1,434	22.3%
	SF ATTACHED	297	288	3.0%	86	29.0%	202	68.0%
	2 UNITS	133	115	13.5%	4	3.0%	111	83.5%
	3 OR 4 UNITS	56	56	0.0%	0	0.0%	56	100.0%
	5 OR MORE UNITS	343	343	0.0%	0	0.0%	343	100.0%
	MOBILEHOME/TRAILER	197	197	0.0%	101	51.3%	96	48.7%
	CITY TOTALS	7,455	7,314	1.9%	5,072	69.3%	2,242	30.7%

SOURCE: U.S. Census Bureau, 2006-2010, 2018-2022 American Community Survey, B25032, Tenure by Units in Structure and DP04, Selected Housing Characteristics.

B. GROWTH OF HOUSING STOCK

The City has experienced some growth in housing stock between 2014 and 2023. During the 2014-2023 cycle, the city added 509 housing units. However, this did not meet StanCOG's 2014-2023 total projected need of 1,280 units. Table III-1 depicts growth by unit type between 2020 and 2023.

C. HOUSING QUALITY

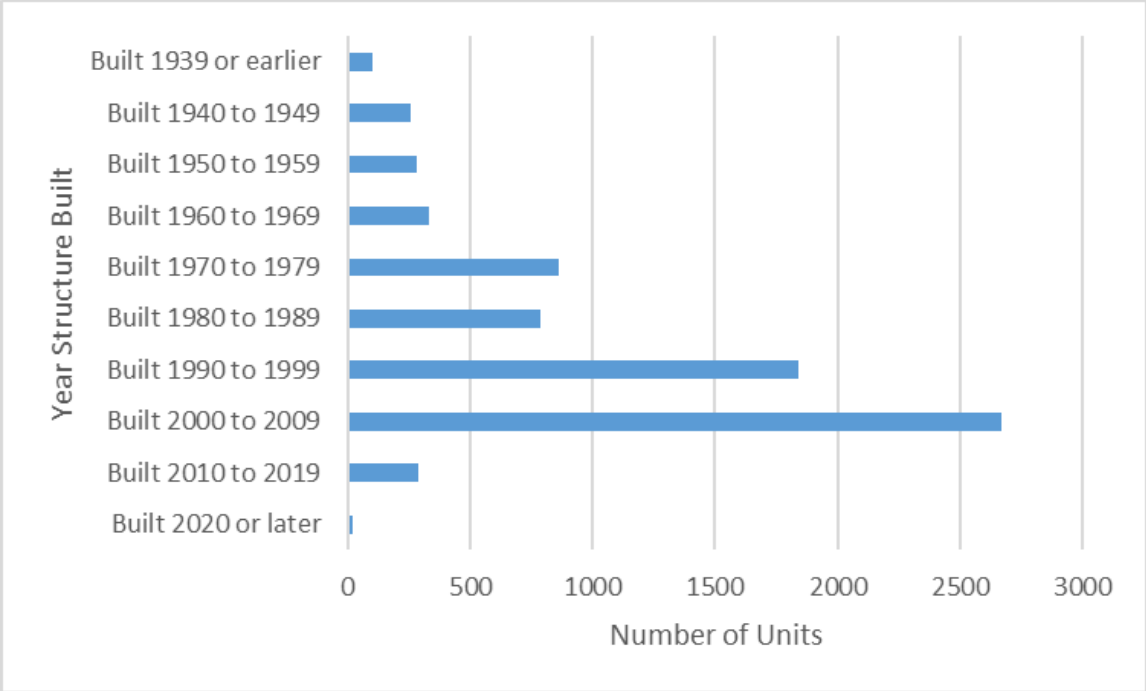
In May 2003, a housing condition survey was conducted by staff of the City of Riverbank. This survey identified that of the existing 4,954 units surveyed, 2,713 units were identified as sound (about 55% of the total units). Of the remaining units, 759 were identified as needing minor repair, 1,191 in need of moderate repair, 229 in substantial condition, and 62 identified as dilapidated units. This corresponds with the large supply of older housing stock in the city. Table III-4 and Chart III-1, Age of Housing Units, 2022, identifies that 982 units were built pre-1969. (More detailed results regarding the housing condition survey can be found in Appendix C.) Program 4.1c has been added to the 2014-2023 Goals, Policies and Implementation Measures for the City to update and complete a Housing Condition Survey by December 2016.

TABLE III-4
Age of Housing Units
City of Riverbank - 1939 to 2022

YEAR STRUCTURE BUILT	TOTAL HOUSING UNITS	% OF TOTAL
BUILT 2020 OR LATER	23	0.3%
BUILT 2010 TO 2019	291	3.9%
BUILT 2000 TO 2009	2,667	35.8%
BUILT 1990 TO 1999	1,840	24.7%
BUILT 1980 TO 1989	788	10.6%
BUILT 1970 TO 1979	864	11.6%
BUILT 1960 TO 1969	336	4.5%
BUILT 1950 TO 1959	285	3.8%
BUILT 1940 TO 1949	259	3.5%
BUILT 1939 OR EARLIER	102	1.4%
TOTAL	7,455	100%

SOURCE: U.S. Census Bureau, 2018-2022 American Community Survey, B25034 Year Structure Built.

CHART III-1
Age of Housing Units – 2022



D. VACANCY RATES

The decreasing vacancy rate for available housing limits choice for both new and existing housing in various price ranges. Vacancy rates have been more critical in lower income single and multiple housing units. It is difficult for people to find vacancies in lower-income housing, and there are long waiting lists for subsidized housing. State Department of Finance (DOF) estimates indicate that the overall vacancy rate for all dwelling units in the City has deceased from 5.8% in 2013 to 2.4% in 2023. (See Table III-5, Annual Vacancy Rates).

Table III-6, Detailed Features of Vacancies – 2022, provides a comparison between Riverbank and Stanislaus County.

TABLE III-5
Annual Vacancy Rates
City of Riverbank – 2013-2023

YEAR	TOTAL HOUSING UNITS	OCCUPIED HOUISNG UNITS	# OF VACANT UNITS	% OF VACANT
JAN 2013	7,098	6,688	410	5.8
JAN 2014	7,109	6,713	396	5.6
JAN 2015	7,125	6,733	392	5.5
JAN 2016	7,172	6,816	356	5.0
JAN 2017	7,287	6,938	349	4.8
JAN 2018	7,300	6,981	319	4.4
JAN 2019	7,342	7,038	304	4.1
JAN 2020	7,493	7,312	181	2.4
JAN 2021	7,509	7,328	181	2.4
JAN 2022	7,537	7,355	182	2.4
JAN 2023	7,634	7,450	184	2.4

SOURCE: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State – January 1, 2013-2023, Sacramento, California, May 2023.

TABLE III-6
Detailed Features of Vacancies
City of Riverbank and Stanislaus County – 2022

VACANT HOUSNG UNITS	RIVERBANK		STANISLAUS	
	NUMBER	% OF VACANT UNITS	NUMBER	% OF VACANT UNITS
FOR RENT	26	18.44%	1,919	25.35%
RENTED, NOT OCCUPIED	0	0.00%	353	4.66%
FOR SALE ONLY	22	15.60%	1,011	13.36%
SOLD, NOT OCCUPIED	16	11.35%	1,693	22.36%
FOR SEASONAL, RECREATIONAL, OCCASIONAL USE	31	21.99%	376	4.97%
FOR MIGRANT WORKERS	0	0.00%	0	0.00%
OTHER VACANT	46	32.62%	2,218	29.30%
TOTAL VACANT	141	100%	7,570	100%

SOURCE: U.S. Census Bureau, 2018-2022 5-Year American Community Survey, B25004

E. ECONOMIC CHARACTERISTICS OF HOUSING

According to Cary Pope, a Real Estate Agent and housing developer, the average hard costs (raw building materials, excluding permit fees, impact fees, etc.) is about 125 to 150 dollars a foot. For a 1,500 square foot construction, which equals $225,000. Construction costs have increased about 100 percent in the last decade. Increased costs affect the renter and homebuyer alike, ultimately affecting the cost and availability of labor due to the decreasing supply of affordable housing. This phenomenon is reflected in the escalation of median priced homes in Stanislaus County over the past decade. In 2020, a median priced home in Stanislaus County was $285,200. For the City of Riverbank, the median price for a home in 2020 was $253,700, according to the 2016-2020 American Community Survey. According to Zillow Home Value Index, the median home value was $461,094, as of November of 2023 (See Table III-7).

TABLE III-7
Median Home Values – 2020 and ~~2023~~2025
Median Rents – 2010 and 2022
Stanislaus County and California

MEDIAN HOMES VALUES	2020 HOME VALUES	% OF STANISLAUS MEDIAN	~~NOVEMBER, 2023~~FEBRUARY 2025 HOME VALUES	% OF STANISLAUS MEDIAN	% CHANGE IN MEDIAN VALUE: 2020 – ~~2023~~2025
CERES	$256,200	89.83%	$453,058~~$433,247~~	97.14%~~96.86%~~	76.84%~~69.10%~~
HUGHSON	$264,100	92.60%	$546,000~~$522,295~~	117.06%~~116.76%~~	106.74%~~97.76%~~
MODESTO	$282,500	99.05%	$445,760~~$427,902~~	95.57%~~95.66%~~	57.79%~~51.47%~~
NEWMAN	$217,900	76.40%	$440,186~~425,539~~	94.38%~~95.13%~~	102.01%~~95.29%~~
OAKDALE	$287,300	100.74%	$554,993~~$532,911~~	118.99%~~119.14%~~	93.18%~~85.49%~~
PATTERSON	$287,300	100.74%	$519,025~~$504,335~~	111.28%~~112.75%~~	80.66%~~75.54%~~
RIVERBANK	**$253,700**	**88.96%**	**~~$484,769~~$~~461,094~~**	**103.93%~~103.08%~~**	**91.08%~~81.75%~~**
TURLOCK	$294,100	103.12%	$483,331~~$462,943~~	103.63%~~103.49%~~	64.34%~~57.41%~~
WATERFORD	$239,100	83.84%	$423,347~~$403,434~~	90.77%~~90.19%~~	77.06%~~68.73%~~
STANISLAUS COUNTY	**$285,200**	**100.00%**	**~~$466,419~~$~~447,313~~**	**100.00%~~100.00%~~**	**63.54%~~56.84%~~**
CALIFORNIA	$458,500	160.76%	$784,840~~$746,055~~	168.27%~~166.79%~~	71.18%~~62.72%~~

MEDIAN CONTRACT RENT	2010 CONTRACT RENT	% OF STANISLAUS MEDIAN	2022 CONTRACT RENT	% OF STANISLAUS MEDIAN	% CHANGE IN MEDIAN VALUE: 2010-2022
CERES	$771	96.9%	$1,269	106.5%	64.59%
HUGHSON	$792	99.5%	$1,598	134.1%	101.77%
MODESTO	$819	102.9%	$1,250	104.9%	52.63%
NEWMAN	$712	89.4%	$908	76.2%	27.53%
OAKDALE	$863	108.4%	$1,129	94.7%	30.82%
PATTERSON	$913	114.7%	$1,161	97.4%	27.16%
RIVERBANK	**$838**	**105.3%**	**$1,161**	**97.4%**	38.54%
TURLOCK	$785	98.6%	$1,206	101.2%	53.63%
WATERFORD	$625	78.5%	$1,043	87.5%	66.88%
STANISLAUS COUNTY	**$796**	**100.0%**	**$1,192**	**100.0%**	49.75%
CALIFORNIA	$1,044	131.16%	$1,699	142.53%	62.74%

SOURCE: U.S. Census Bureau, 2016-2020 American Community Survey, B25077; 2006-2010, 2018-2022 American Community Survey, B25058; Zillow Home Values Index, ~~November 2023~~February 2025.

In evaluating housing affordability, households are divided into four income categories relative to the median household income for Stanislaus County. The 2020 median income, as set by the Housing and Urban Development Department (HUD), for Stanislaus County was estimated to be $69,300 for a family of four. The 2023 median income is estimated to be $92,600 (Table III-8, Income Limits by Income Category and Size, 2023). The following illustrates how the four income categories are divided.

Extremely-low-income = Households who earn 30% or less of the median area income.
Very-Low-Income = Households who earn between 30% and 50% of the median area income.
Low-Income = Households who earn between 51% and 80% of the area median income.
Moderate-Income = Households who earn between 80% and 120% of the area median income. (100% of the area median income for 2023 is $92,600 for a family of four in Stanislaus County.)
Above Moderate Income = Above 120% of the County median income.

Income limits by income category and size are shown in Table III-8, Income Limits by Income Category and Size, 2023. The 2023 HUD Income Limits became effective on May 15, 2023.

TABLE III-8
Income Limits by Income Category and Size - Stanislaus County, 2023

PERSON(S)	EXTREMELY LOW INCOME	VERY LOW INCOME	LOW INCOME	MODERATE INCOME	ABOVE MODERATE INCOME
1	$17,750	$29,550	$47,250	$64,800	$77,750
2	$20,250	$33,800	$54,000	$74,100	$88,900
3	$24,860	$38,000	$60,750	$83,350	$100,000
4	$30,000	$42,200	$67,500	$92,600	$111,100
5	$35,140	$45,600	$72,900	$100,000	$120,000
6	$40,280	$49,000	$78,300	$107,400	$128,900
7	$45,420	$52,350	$83,700	$114,800	$137,750
8	$50,560	$55,750	$89,100	$122,250	$146,650

SOURCE: HUD Family Income Limits, FY 2023

In determining housing affordability, State and federal guidelines stipulate that a household should not spend more than 30 percent of its gross income on housing needs. Households paying more than 30 percent of their annual income on housing are determined by HUD as needing housing assistance. Table III-9 illustrates housing affordability by income category for a family of four.

TABLE III-9
Affordable Housing Guidelines by Income Category – 2023

Category	Income Range (Family of Four)	Maximum Rent or Mortgage*	Maximum Home Loan**	Riverbank Regional Share (units)
Extremely Low Income	up to $30,000	up to $750	$104,731	485
Very Low	$30,000 to $42,200	$750 to $1,055	$168,637	485
Low	$42,200 to $67,500	$1,055 to $1,688	$301,101	672
Moderate	$67,500 to $111,100	$1,688 to $2,778	$529,392	594
Above Moderate	$111,100 +	$2,277~~7~~8 +	$529,392 +	1,355

SOURCE: HUD Median Income Limits, 2023, effective May 15, 2023. *Not to exceed 30% of monthly income
**Assumes 30% of income devoted to mortgage payment, taxes, mortgage insurance and homeowner's insurance; 97% loan @ 4% 30 year term, FHA. No consumer debt is assumed. https://myhome.freddiemac.com/resources/calculators/how-much-can-you-borrow

Table III-10 below shows HUD-defined Fair Market Rent levels (FMR) for Stanislaus County for FY 2019 and 2024. In general, the FMR for an area is the amount that would be needed to pay the gross rent (shelter rent plus utilities) of privately owned, decent, safe, and sanitary rental housing of a modest (non-luxury) nature with suitable amenities. FMRs are housing market-wide estimates of rents that provide opportunities to rent standard quality housing throughout the geographic area in which rental housing units are in competition. The rents are drawn from the distribution of rents of all units that are occupied by recent movers. Adjustments are made to exclude public housing units, newly built units, and substandard units.

Comparing Table III-10 to Table III-9, a four-person household classified as Low-Income (80% of median) with an annual income of up to $67,500 could afford to pay $1,055 to $1,688 monthly gross rent (including utilities). The FY 2024 HUD FMR for a 2-bedroom unit is $1,528, which is affordable to the household assuming that such units are available in Riverbank. However, a four-person household classified as Extremely Low-Income (30% of median) with an annual income of up to $30,000 could afford to pay more than $750 monthly gross rent. No unit types would be affordable to this household. The table below indicates the FMRs by number of bedrooms for Stanislaus County.

TABLE III-10
FY 2019 and 2024 FMRs by Unit Bedrooms
Stanislaus County

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2019 FMR	$722	$803	$1,016	$1,451	$1,715
FY 2024 FMR	$1,143	$1,188	$1,528	$2,153	$2,536

SOURCE: HUD Final FY 2019 and 2024 FMR Summary for Stanislaus County, California

Table III-10, FY 2019 and 2024 FMR, reflects the increase in rental rates in two bedroom and more units and, when compared with Table III-9, the widening gap between rental rates and the amount that extremely low-income households can afford to pay.

F. HOUSING CHOICE

The availability of a mix of housing types and sizes is an important goal in meeting the varied social and economic needs of residents in the community. Availability of choice affects expanding families that need larger homes, retirees who would like to move from a large home to a smaller one requiring less maintenance, or the first-time buyer who is seeking an initial opportunity to own a modest sized starter home. Choice of housing is constrained by several factors. One factor is increased costs; for example, the median price of a resale home in Riverbank increased 81.75% between 2020 and 2023 (See Table III-7). Another factor is the prospect of established homeowners paying increased property taxes (under Proposition 13) if they move and purchase a smaller (or larger) home. A third factor is low vacancy rates, especially for lower-income and subsidized housing.

In Riverbank, an additional factor was a lack of larger, move-up housing stock. The City has traditionally provided more modest-sized affordable homes, in comparison to other communities. Almost all single-family homes built before 1969 are "starter" homes. In consequence, to move to larger homes, residents had to leave the community. With the approval of the Crossroads Community Specific Plan in 1998, this trend has shifted, meeting the demand for move-up housing stock. Currently, Crossroads West has issued 102 permits, with 81 permits being finaled.

G. SUBSIDIZED HOUSING (City of Riverbank Housing Authority)

Established in 1952, the Riverbank Housing Authority (RHA) oversees 60 units designated for use by eligible elderly/handicapped applicants and 30 units occupied by families. Recently, the RHA entered into an agreement with the Stanislaus Housing Authority which will enable them to purchase land and develop more housing units. According to Lety Ibanez of the Riverbank Housing Division and Miriam Giebeler of the Riverbank Housing Authority the Riverbank Housing Authority continues to oversee 60 units designated for use by eligible elderly/handicapped applicants and 30 units occupied by families. The affordability of these units depend upon HUD funding and according to Jim Kruse, Executive Director of the Stanislaus Regional Housing Authority they will not expire in the foreseeable future and will not expire during the 2023-2031 Planning Period.

SECTION IV
Housing Supply and Needs

Section 65583 of the Government Code requires that Housing Elements identify and analyze existing and projected housing needs for all economic segments of the community. This is to include analysis of special housing needs, including handicapped, elderly, large families, farm workers, families with female heads of households, and families and persons in need of emergency shelter. The State mandates that existing and projected needs include the locality's share of the regional housing need, determined by the regional Council of Government (StanCOG). These requirements are discussed in the sections below.

A. LOCAL HOUSING SUPPLY

The City's housing supply reflects supply and demand in the real estate market, and residential growth policies contained in the General Plan. Current trends affecting private sector activity are discussed in other sections of the Element. The effects of growth management policies on housing supply are discussed below.

1. General Plan Policies

A foundational policy of the General Plan is that future growth shall not exceed the City's capability to provide infrastructure and services.

2. Estimated Costs to Purchase/Rent Housing

State law defines affordability as a housing unit where the household does not pay more than 30 percent of its income towards housing costs.

The State affordability income guidelines for a family of four (Table IV-1) can be compared with the following tables which profile cost trends in Riverbank's rental and for-sale housing market for different housing types over the last decade.

TABLE IV-1
Income Limits – Stanislaus County, 2023
Using HUD Affordability Guidelines for a Family of Four

Median Income: $92,600		
Extremely Low	**30% of Median**	**$30,000**
Very Low	**50% of Median**	**$42,200**
Low	**80% of Median**	**$67,500**
Moderate	**100%-120% of Median**	**$92,600**
Above Moderate	**120% of Median & up**	**$111,100**

SOURCE: California Department of Housing and Community Development, effective May 13, 2023

B. OVERPAYMENT OF LOWER-INCOME HOUSEHOLDS

Overpayment occurs when a household spends 30 percent or more of its gross income on housing and utilities. Household incomes are divided into five categories: extremely low, very low, low, moderate, and above moderate income. The lower income categories represent incomes of up to 80 percent of the regional median household income. The county's median income for a family of four is estimated to be $92,600 in 2023, so lower-income households were those with an income of $67,500 or less.

Table IV-2 below shows the proportions of lower-income households overpaying for housing in Riverbank in 2022. Appendix F contains method of calculation for the 2023 estimates.

TABLE IV-2
Number of Lower Income Owner and Rental Households Overpaying for Housing 2022

AMI	Households by Income Category Paying in Excess of 30% of Income Toward Housing Cost (Overpayment by Income Category)						
92,600	Riverbank						
Household	Extreme Low	Very Low	Low	Moderate	Above Moderate	Total	Lower Income
Ownership Households	199	289	385	715	3433	5021	873
Overpaying owner households	181	244	237	311	405	1378	662
Percentage of overpaying owners	91.0%	84.4%	61.6%	43.5%	11.8%	27.4%	75.8%
Renter Households	395	274	197	296	936	2098	866
Overpaying renter households	365	252	133	114	30	894	750
Percentage of overpaying renters	92.4%	92.0%	67.5%	38.5%	3.2%	42.6%	86.6%
Total Households	594	563	582	1011	4369	7119	1739
Overpaying Households	546	496	370	425	435	2272	1412
Percentage of overpaying households	91.9%	88.1%	63.6%	42.0%	10.0%	31.9%	81.2%

SOURCE: U.S. Census Bureau, 2018-2022 American Community Survey, B25106

C. EXISTING EXTREMELY LOW-INCOME (ELI) HOUSEHOLDS

Riverbank has 740 existing extremely low-income households, 69.6% of which have housing problems, according to the HUD and census data from the Comprehensive Housing Affordability Strategy (CHAS) Data (2016-2020 ACS) (Table IV-3). Riverbank's regional housing need allocation (RHNA) for very low-income households is 970 dwelling units. The existing number of ELI households and very low-income households should equal the City's RHNA. Program 2.1a and 2.1b ~~has been added to~~ prioritize funding for the development of housing affordable to extremely low-income households. This incentive to develop this housing type will help rectify the disparity between existing extremely low-income households and Riverbank's RHNA for this category.

ELI households often require specific housing solutions such as deeper income targeting for subsidies; housing with supportive services; single-room occupancy (SROs) and/or shared housing; and rent subsidies (vouchers). Program 2.1b has been added to assist developers of extremely low-, low- and very low- income housing in the grant preparation process to help fund developments and services of this type.

These housing challenges are often compounded by other special needs. Seniors and disabled individuals frequently require accessible housing, which remains scarce. There is a notable gap in resources for non-senior ELI populations, including single-parent households and the working poor. A recent effort to construct tiny homes for single mothers reflects growing awareness of these unmet needs, but broader solutions are still necessary.

Housing insecurity also has downstream effects on transportation and health. ELI residents often face limited access to public transit, which restricts their ability to find and maintain employment or attend school and medical appointments. Transportation limitations can further isolate residents from social support systems. Health disparities are also closely tied to housing and income. Low-income communities, particularly those of color, face disproportionate risks from environmental hazards such as extreme heat and wildfire smoke, conditions intensified by climate change. These environmental stressors, combined with limited access to healthcare and nutritious food, can severely impact the physical and mental health of ELI individuals and families.

While Riverbank has made some strides through partnerships and affordable housing developments, the current resources are not sufficient to meet the needs of its ELI population. The shortage of affordable and accessible housing, inadequate transportation infrastructure, and uneven distribution of support services suggest a need for a more coordinated and comprehensive approach. Filling these gaps will require expanded investment, cross-sector collaboration, and policies designed to address the systemic barriers that disproportionately affect Riverbank's most vulnerable residents.

To address the range of needs of ELI households, Riverbank will implement several programs including the following (refer to Section X, *2023 – 2031 Housing Goals and Policies*):

- Program 2.1a: Non-Profit Developers
- Program 2.1b: Funding for Lower-Income Developments
- Program 2.1d: Farmworker Housing Technical Assistance
- Program 2.1e: Farmworker Housing Development
- Program 2.1g: Infill Opportunity Areas
- Program 2.1i: Inclusionary Housing Ordinance
- Program 2.1j: Housing Choice Voucher Program
- Program 3.1b: Fee Waiver Program
- Program 3.1f: Lower-Income and Special Needs Housing

Supportive housing is allowed by right in the R-1, R-2 and R-3 zoning districts, and with a conditional use permit in the C-1, C-2, and CM zoning districts (See Table D-1, Residential Types Permitted by Zone). There are ~~46.77~~44.73 acres of undeveloped and underutilized land zoned R-1, R-2, and R-3 within Riverbank's city limits, which would provide sufficient capacity to accommodate the need for supportive housing. Program ~~2.1L~~ 3.1j has been added to amend the Riverbank Zoning Code to add provisions for single room occupancy (SRO) units.

TABLE IV-3
Housing Problems for All Households – Riverbank – September 2023

	Total Owners	Total Renters	Total Households
Household Income <=30% HAMFI	**225**	**515**	**740**
% with any housing problems	68.9%	69.9%	69.6%
% Cost Burden >30%	66.7%	69.9%	68.92%
% Cost Burden >50%	44.4%	61.2%	56.1%
Household Income >30% to <=50% HAMFI	**380**	**290**	**670**
% with any housing problems	68.4%	82.8%	74.6%
% Cost Burden >30%	68.4%	72.4%	70.15%
% Cost Burden >50%	26.3%	36.2%	30.6%
Household Income >50% to <=80% HAMFI	**715**	**535**	**1,250**
% with any housing problems	59.4%	79.4%	68.0%
% Cost Burden >30%	56.6%	68.2%	61.60%
% Cost Burden >50%	11.2%	5.6%	8.8%

SOURCE: State of the Cities Data Systems: Comprehensive Housing Affordability Strategy (CHAS) Data, 2016-2020 ACS, released September 5, 2023

D. NUMBER OF OVERCROWDED HOUSEHOLDS

Overcrowded households are defined by the Census Bureau as those having more than 1.01 persons per room. Severely Overcrowded is defined as those having more than 1.50 persons per room. This condition is reflective of one of three conditions: (1) a family or household inhabiting too small a dwelling; (2) a family living with extended family members; or (3) a family renting inadequate living space to non-family members.

Table IV-4, Persons per Room in Occupied Units for the City of Riverbank, presents information on the amount of overcrowded households based on the 2010 and 2022 American Community Survey. 309 (6.53%) households in owner-occupied units and 263 (16.81%) households in renter-occupied units were classified as overcrowded, according to the 2010 ACS data. Many of these renter households are exceptionally large families and the overcrowding in the renter units is worse than in the owner-occupied units. Overall, 572 (9.09%) of all the occupied units were overcrowded in 2010.

Data more recent (2022 ACS) show that 285 (5.62%) households in owner-occupied are overcrowded and 187 (8.34%) in renter-occupied. 24 (0.47%) owner-occupied are severely overcrowded and 49 (2.19%) in renter-occupied are severely overcrowded.

There also seems to be a direct link between overcrowding and housing affordability. Homeowners or renters with large families are unable to afford larger dwellings, individuals on fixed incomes are left no alternative but inadequate housing, and the young are unable to make rental payments or secure home loans so they reside longer with their parents.

In addition, families with large numbers of children are most likely to live in overcrowded conditions. Therefore, children are usually the largest percentage of persons living in substandard conditions.

TABLE IV-4
Persons per Room in Occupied Housing Units
City of Riverbank - 2010 and 2022

PERSONS PER ROOM	# OF OCCUPIED UNITS	% OF UNITS	# OF OCCUPIED UNITS	% OF UNITS
ALL OCCUPIED HOUSING UNITS:	**2010 CENSUS**		**2022 CENSUS**	
1.00 OR LESS	5,724	90.91%	6,842	93.55%
1.01 TO 1.50	**437**	6.94%	**399**	5.46%
1.51 OR 2.00	**95**	1.51%	**38**	0.52%
2.01 OR MORE	**40**	0.35%	**35**	0.48%
CITY TOTALS	6,296	100%	7,314	100%
TOTAL OVERCROWDED	**572**	9.09%	**472**	6.45%
TOTAL SEVERELY OVERCROWDED	**135**	2.14%	**73**	1.00%
OWNER-OCCUPIED HOUSING UNITS:				
1.00 OR LESS	4,422	93.47%	4,787	94.38%
1.01 TO 1.50	**255**	5.39%	**261**	5.15%
1.51 OR 2.00	**36**	0.76%	**24**	0.47%
2.01 OR MORE	**18**	0.38%	**0**	0%
CITY TOTALS	4,731	100%	5,072	100%
TOTAL OVERCROWDED	**309**	6.53%	**285**	5.62%
TOTAL SEVERELY OVERCROWDED	**54**	1.14%	**24**	0.47%
RENTER-OCCUPIED HOUSING UNITS:				
1.00 OR LESS	1,302	83.19%	2,055	91.66%
1.01 TO 1.50	**182**	11.63%	**138**	6.16%
1.51 TO 2.00	**59**	3.77%	**14**	0.62%
2.01 OR MORE	**22**	1.41%	**35**	1.56%
CITY TOTALS	1,565	100%	2,242	100%
TOTAL OVERCROWDED	**263**	16.81%	**187**	8.34%
TOTAL SEVERELY OVERCROWDED	**81**	5.18%	**49**	2.19%

SOURCE: U.S. Census Bureau, 2006-2010, 2018-2022 American Community Survey, B25014, Tenure by Occupants Per Room

E. AMOUNT OF HOUSING NEEDING REHABILITATION

The City of Riverbank received Community Development Block Grants between 2014 and 2023. These grants assisted in providing 21 loans — 4 for home rehab and 17 to first-time homebuyers. The Housing Rehabilitation Program issued zero loans in 2023 according to Lety Ibañez of the Riverbank Housing Division. The 2003 Housing Condition Survey (see Appendix B) conducted by city staff identified that of the 4,954 residential units surveyed, nearly 30% (1,482 units) were in need of *at least* moderate repair. This was consistent with the older housing stock numbers in the city.

F. SPECIAL NEEDS

State and federal law requires local governments to take steps to assure that housing programs are implemented in such a manner as to eliminate the effects of discrimination in housing based on race, color, religion, sex, or national origin. In addition, State anti-discrimination standards prohibit discrimination on the basis of marital status or family size. These policies apply to all income levels rather than just lower-income groups.

The special needs of other groups are defined by the unique circumstances of the group which require special housing considerations, and the ability of the groups to afford the special consideration. An effort to alleviate special needs must therefore consist of two separate phases: first, programs to assist special need groups which have inadequate financial resources; and second, assurances of equal access to all community housing resources for all segments of the community.

G. RIVERBANK HOUSING NEEDS

Federal regulations require that area-wide agencies "identify the housing needs of the current and prospective population by appropriate geographic sectors and identifiable segments of the population and provide for the distribution of housing resources (including assisted housing) to meet the needs of all citizens in order to provide a choice of housing type and location." The regulations further require that broad goals and annual objectives be specified and that a housing policy be established to allocate housing resources in a manner appropriate to the identified needs.

The purpose of the fair share allocation is to provide localities with a general measure of local responsibility for addressing a fair share of the market area housing need. Within Stanislaus County, the adopted StanCOG Regional Housing Needs Assessment serves as the fair share allocation for all jurisdictions.

H. MARKET-RATE HOUSING NEEDS

Market-rate households are those, which do not have to pay a disproportionate amount (30% or more) of gross household income in order to secure adequate housing. Riverbank has previously afforded market-rate households the opportunity to locate in the city by annexing for residential uses, by providing public services to those areas, and by encouraging increased employment opportunities in the urban area. Beyond the commitment to provide housing opportunities, a matter of continuing concern is the need to achieve a measure of economic balance in the value of new homes. At present, the city has a preponderance of low and moderate-income households.
A greater parity between the number of low, moderate, middle and upper-income homes could benefit the entire city.

Riverbank experienced a rate of growth over the past several years, with new construction at comparable rates to other cities in Stanislaus County. Table IV-5 identifies the yearly household increase from 2013 to January of 2023. During this time frame, the City of Riverbank added 536 units to its housing stock, which equates to a 7.55 percent increase. During this same time frame, the total increase in housing units for the county was 3.18 percent.

TABLE IV-5
Yearly Housing Unit Increase Stanislaus County and Cities (2013-2023)

CITY	2013	2014	2015	2016	2017	2018	2019
CERES	13,717	13,725	13,764	13,799	13,807	13,811	13,829
HUGHSON	2,310	2,350	2,365	2,381	2,398	2,426	2,432
MODESTO	75,601	75,711	75,712	75,715	75,816	75,953	76,196
NEWMAN	3,438	3,437	3,437	3,469	3,527	3,599	3,655
OAKDALE	7,903	7,961	8,019	8,112	8,185	8,281	8,376
PATTERSON	6,356	6,363	6,363	6,413	6,465	6,557	6,619
RIVERBANK	7,098	7,109	7,125	7,172	7,287	7,300	7,342
TURLOCK	24,680	24,727	24,779	24,838	24,896	24,920	24,931
WATERFORD	2,665	2,665	2,665	2,665	2,666	2,669	2,669
UNINCORP.	36,140	36,117	36,189	36,213	36,327	36,400	36,465
TOTAL	179,908	180,165	180,418	180,777	181,374	181,916	182,514

CITY	2020	2021	2022	2023	ABSOLUTE CHANGE	PERCENT CHANGE
CERES	13,828	13,832	13,834	13,837	120	0.87%
HUGHSON	2,486	2,499	2,524	2,577	267	11.56%
MODESTO	76,476	76,653	77,048	77,702	2,101	2.78%
NEWMAN	3,739	3,743	3,755	3,761	323	9.39%
OAKDALE	8,428	8,479	8,549	8,552	649	8.21%
PATTERSON	6,685	6,733	6,994	7,128	772	12.15%
RIVERBANK	7,493	7,509	7,537	7,634	536	7.55%
TURLOCK	25,105	25,210	25,313	25,388	708	2.87%
WATERFORD	2,707	2,715	2,720	2,786	121	4.54%
UNINCORP.	36,193	36,213	36,239	36,257	117	0.32%
TOTAL	183,140	183,586	184,513	185,622	5,714	3.18%

SOURCE: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State – January 1, 2013-2023, Sacramento, California, May 2023.

In the estimate by the Department of Finance, dated January 1, 2023, the population of the City of Riverbank (24,695) represented 4.5 percent of Stanislaus County's total population. The Housing Needs Report predicts a countywide need to plan for 34,344 new homes between 2023 and 2031. The proportional share for Riverbank is 3,591 new units (Table IV-6).

Currently, the City is at about 80% of meeting its above-moderate income housing units but is falling behind in its provision for moderate, low-income, very-low, and extremely-low households. The City has only met 13% of its low and very low-income provisions for the previous cycle.

The City of Riverbank, however, cannot guarantee construction or occupancy of new units consistent with present or future allocations, only that the City will take steps to assure that the opportunity exists for all households to locate in Riverbank.

Most homes in Riverbank are made available in the commercial marketplace through the efforts of the housing industry, and it is expected that housing construction and occupancy will continue to primarily be a function of private market forces.

TABLE IV-6
Housing Needs Allocation
June 30, 2023 – December 31, 2031

CITY	VERY LOW INCOME	LOW INCOME	MODERATE INCOME	ABOVE MODERATE INCOME	TOTAL PROJECTED NEED
Ceres	706	489	661	1,505	3,361
Hughson	284	196	122	279	881
Modesto	2,807	1,943	1,981	4,517	11,248
Newman	197	136	218	497	1,048
Oakdale	414	286	294	672	1,665
Patterson	1,046	724	593	1,353	3,716
Riverbank	**970**	**672**	**594**	**1,355**	**3,591**
Turlock	1,305	903	1,096	2,498	5,802
Waterford	107	74	115	261	557
Unincorporated	574	398	458	1,045	2,475
TOTAL	**8,410**	**5,821**	**6,132**	**13,981**	**34,344**

SOURCE: StanCOG Regional Housing Needs Assessment 2023-2031 (Note: Table may not add due to rounding)

I. NON-MARKET-RATE HOUSING NEEDS

Non-market rate households are those that are unable to secure adequate housing except at a cost which is disproportionate to the gross household income and, therefore, do not have the financial capability to meet their housing needs without sacrificing other essential needs. The adequacy of a housing unit is related to the physical condition of the structure or to the special needs of the household.

For the purpose of this housing element, special needs categories shall include housing units which are:

- dilapidated;
- deteriorated;
- overcrowded; or
- overpriced in relation to the gross household income.

Special need groups shall include very low, low, and moderate-income households which are defined as:

- elderly;
- handicapped;
- large family;

- farm workers;
- female heads of households; or
- homeless

While market-rate housing needs are expected to be met by the private housing market, addressing the inadequate conditions of non-market rate households may require action from the public sector. Indeed, one purpose of State and federal housing requirements is to encourage local jurisdictions to identify housing needs and to develop programs to mitigate the needs.

J. THE ELDERLY

The elderly often face a lack of housing in the marketplace suitable for their needs since they are likely to have fixed or limited incomes. In addition to financial considerations, the elderly require special needs in housing construction and location to allow for access and mobility. Elderly citizens must rely on public transportation if their dwellings are not located within close proximity to local services. The elderly often need additional mobile assistance in the form of ramps and handrails, which will allow access to public facilities.

Because the elderly often live alone, they are more vulnerable to abuse and theft and thus, need security devices to safeguard their homes against unwanted intrusions. Retirement and convalescent homes offer alternative housing choices, but the majority live in independent residences, often in substandard conditions. The 2020 Census shows that there are 4,117 people in the City of Riverbank who are aged 60 years or over (Table IV-7); this is 16.6 percent of the total population. Stanislaus County is slightly higher at 19.8 percent.

Census data show the vast majority of older Americans (96 percent) live in their homes within the community, as opposed to only 4 percent living in an institutional setting. Repeatedly, research such as the 2021 AARP survey shows that more than three-quarters of older Americans want to stay in their homes and communities as they age. Households with members over age 65 are three times less likely to relocate than those under 65. While a large proportion of the elderly population lives alone; many seniors find single-family homes too costly to maintain; others cannot afford multifamily rental housing.

While a notable segment of the elderly population does not require constant care, to counter problems with affordability or when faced with the need to find housing, some seniors choose to live in alternative housing. For example, shared housing programs match people in need of housing with other homeowners or apartment dwellers looking for roommates. These arrangements reduce housing costs and often ameliorate the sense of loneliness and isolation the elderly feel when a spouse dies or extended family members move away.

The increasing number of elderly persons in the population is creating a demand for more affordable housing in the short-term. Long-range planning must recognize this need and design innovative programs to address the demand.

Connecting senior units with services, transportation and social community centers offer opportunities for social interaction for the elderly. Additional housing types considered appropriate for the elderly include townhouses, one-story duplexes and second units (granny flats). Congregate housing, which provides services on-site such as a common dining room and kitchen with support services, allows the elderly to maintain their independence.

In addition to incentivizing new construction of a variety of housing types to meet the needs of the growing elderly population, the City's Housing Rehabilitation Program for Low Income residents provides funds for minor retrofit and disabilities/handicap modifications to allow elderly persons to remain in their home. Within the program the City offers funds to address items of Health and Safety concern as well as State and local code violations. The following are typical items addressed by the Housing Rehabilitation Program: insulation for attic and walls, weather-stripping for doors and windows, energy efficient windows, installation of HVAC units, security lighting, security doors, smoke detectors, carbon monoxide detectors, and replacement of water heaters, roofs, and electrical,

The gap between available resources and the housing needs of Riverbank's senior population is significant. With a growing number of seniors living on fixed incomes, the limited supply of affordable and accessible housing options poses a substantial challenge. Efforts to expand housing must consider not only the quantity of units but also their affordability and suitability for senior residents. Addressing these issues is crucial to ensure that Riverbank's seniors can age in place with dignity and security.

The City has a variety of organizations which provide services to the elderly and assist with the specific housing needs of elderly households. A listing of these organizations is provided on Page IV-11:

Riverbank Senior Resources	
Brown Bag (Salvation Army) Christian Food Share Assembly of God Church Saint Vincent de Paul Society Reach Program (Former program provided by Christ the King Church) Senior Meals Program Riverbank Christian Food Sharing	Provide meals to qualifying families, individuals, and seniors. Also provide volunteer opportunities.

City Department of Parks and Recreation Senior Activities	Provides a social gathering place for seniors to exercise and interact.
Meals on Wheels	Provides meals to home-bound seniors.
Stanislaus Regional Transit – START. Dial-a-Ride	Provides door-to-door service for residents who have a qualifying disability or those at least 65 years of age.
Riverbank Public Library	Library books available in large print.

TABLE IV-7
Population 60 Years of Age and Older
City of Riverbank and Stanislaus County – 2020

	RIVERBANK			STANISLAUS COUNTY		
	2020 CENSUS			2020 CENSUS		
	#	% OF CITY POP.	% OF CITY POP. 60+	#	% OF COUNTY POP.	% OF COUNTY POP. 60+
	TOTAL POPULATION: 24,865			TOTAL POPULATION: 552,878		
60 YEARS+						
MALE	1,846	7.4%	44.8%	49,975	9.0%	45.6%
FEMALE	2,271	9.1%	55.2%	59,728	10.8%	54.4%
TOTAL	**4,117**	**16.6%**	**100%**	**109,703**	**19.8%**	**100%**
60 TO 64 YEARS						
MALE	577	2.3%	14.0%	14,949	2.7%	13.6%
FEMALE	679	2.7%	16.5%	16,321	3.0%	14.9%
TOTAL	**1,256**	**5.1%**	**30.5%**	**31,270**	**5.7%**	**28.5%**
65 TO 74 YEARS						
MALE	833	3.4%	20.2%	21,795	3.9%	19.9%
FEMALE	961	3.9%	23.3%	24,957	4.5%	22.7%
TOTAL	**1,794**	**7.2%**	**43.6%**	**46,752**	**8.4%**	**42.6%**
75 TO 84 YEARS						
MALE	347	1.4%	8.4%	9,852	1.8%	9.0%
FEMALE	457	1.8%	11.1%	12,841	2.3%	11.7%
TOTAL	**804**	**3.2%**	**19.5%**	**22,693**	**4.1%**	**20.7%**
85 YEARS +						
MALE	89	0.4%	2.2%	3,379	0.6%	3.1%
FEMALE	174	0.7%	4.2%	5,609	1.0%	5.1%
TOTAL	**263**	**1.1%**	**6.4%**	**8,988**	**1.6%**	**8.2%**

SOURCE: U.S Census Bureau, 2020 Census, DP1, Profile of General Population and Housing Characteristics: 2020 for Riverbank and Stanislaus County.

According to the U.S. Census Bureau, American Community Survey, there are a total of 1,592 senior households in the City of Riverbank (owner and renter households), which represent 22 percent of all households. In 2021, senior households totaled 31.1 percent and in Stanislaus County, senior households represented 29.8 percent of all households in the County. Table IV-8 shows the occupancy by age of all households in Riverbank.

TABLE IV-8
Occupancy by Age and Type
City of Riverbank, 2023

	Households	Percent
Total Households	**7,266**	**-**
Owner Occupied		
15 to 24 years	42	1%
25 to 34 years	649	13%
35 to 44 years	1,314	26%
45 to 54 years	1,082	22%
55 to 59 years	293	6%
60 to 64 years	343	7%
65 to 74 years	645	13%
75 to 84 years	441	9%
85 years & Older	174	3%
Total	**4,983**	**-**
Renter Occupied		
15 to 24 years	62	3%
25 to 34 years	508	22%
35 to 44 years	484	21%
45 to 54 years	451	20%
55 to 59 years	226	10%
60 to 64 years	220	10%
65 to 74 years	264	12%
75 to 84 years	44	2%
85 years & Older	24	1%
Total	**2,283**	

SOURCE: U.S. Census Bureau, 2023 American Community Survey, B25007

K. THE DISABLED/HANDICAPPED

Disabled individuals often require special access and design features within their housing units. Like the elderly, they also may need aid to travel to and from public facilities. California Administrative Code, Title 24, requires all public buildings be accessible to the public, and therefore, must meet architectural standards such as ramp ways, large door widths and restroom modifications enabling free access for the handicapped. Table IV-8 shows the 2022 estimate of persons' ages by age in Riverbank who have some type of disability (duplications exist in this data).

TABLE IV-98
Disabled Persons by Age
City of Riverbank, 2022

Type of Disability	Persons by Age		
	5-64 years	65+ years	
Hearing	288	402	
Vision	274	167	
Cognitive	599	286	
Ambulatory	645	659	
Self-Care Difficulty	375	231	
Independent Living Difficulty	547	412	**TOTAL**
	1,400	900	2,300

SOURCE: U.S. Census Bureau, 2018-2022 American Community Survey, S1810

Households with a member who has a cognitive disability include those whose disability is psychiatric and those with organic illness--such as organic brain disorders resulting from Alzheimer's disease or AIDS-related infections. The 2020 Census provided the number of individuals who are institutionalized with psychiatric disabilities. The following Table IV-109, Persons in Group Quarters, reflects the number of individuals that are institutionalized within the City of Riverbank and Stanislaus County.

TABLE IV-10~~9~~
Persons in Group Quarters
City of Riverbank and Stanislaus County - 2020

	RIVERBANK		STANISLAUS COUNTY	
	# IN GROUP QUARTERS	*% OF TOTAL*	*# IN GROUP QUARTERS*	*% OF TOTAL*
INSTITUTIONALIZED PERSONS:	**107**	**54.59%**	**2,524**	**38.85%**
CORRECTION INSTITUTIONS	0	0%	377	5.80%
JUVENILE FACILITIES	0	0%	110	1.69%
NURSING HOMES	107	54.59%	2,037	31.35%
OTHER INSTITUTIONS	0	0%	0	0%
NONINSTITUTIONALIZED:	**89**	**45.41%**	**3,973**	**61.15%**
COLLEGE DORMITORIES	0	0%	725	11.16%
MILITARY QUARTERS	0	0%	0	0%
OTHER	89	45.41%	3,248	49.99%
TOTAL:	**196**	**100%**	**6,497**	**100%**

SOURCE: U.S. Census Bureau, 2020 Census, P5, Group Quarters Population by Major Group Quarters Type: 2020

The availability of housing that meets the needs of individuals with disabilities, particularly those with developmental disabilities, is limited. While the city has taken steps to address general affordable housing shortages, specific efforts to accommodate people with disabilities remain underdeveloped. This population faces unique challenges that require more targeted strategies, including accessible housing units, affordability solutions, and integrated supportive services.

The housing gap for people with disabilities in Riverbank is significant. Affordability is one of the primary barriers, as many individuals with developmental disabilities rely on Supplemental Security Income (SSI), which is often not enough to cover even subsidized rent. In addition to cost, many homes in Riverbank may not meet accessibility standards—lacking features such as wheelchair access, accessible bathrooms, or appropriate safety modifications. Without a concerted effort to increase the stock of accessible housing, people with disabilities are often left with few viable options.

Equally important is the absence of supportive housing options that combine affordable living with necessary services like personal care assistance, life-skills training, and case management. These supports are critical for helping individuals with developmental disabilities live independently in community settings. Currently, Riverbank does not have a formal supportive housing program tailored to this population, leaving a service gap that places individuals at higher risk of institutionalization, homelessness, or prolonged dependence on family caregivers.

In addition to structural and financial challenges, people with disabilities often face social and systemic barriers, including housing discrimination and a lack of awareness about their rights under laws like the Fair Housing Act and the Americans with Disabilities Act. Moreover, due to the scarcity of suitable housing options within Riverbank, individuals with disabilities may be forced to move outside the community, leading to social isolation and separation from vital support networks.

County-Wide Resources
Stanislaus Regional Transit Authority: SRTA provides Half Fare Card for disabled persons. ADA Paratransit service complements the fixed-route service available to individuals with disabilities that prevent them from using fixed-route buses and extends ¾ mile from the fixed-route.

L. DEVELOPMENTAL DISABILITIES

A "developmental disability" is defined as a disability that originates before an individual becomes eighteen (18) years old, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. Senate Bill 812, Statutes of 2010, which took effect January 2011, amended State housing element law to require the analysis of the disabled to include an evaluation of the special housing needs of persons with developmental disabilities.

The U.S. Census does not have specific information regarding persons with developmental disabilities; however, each nonprofit regional center contracted with the California Department of Developmental Services (DDS) maintains an accounting of the number of persons served by zip code.

DDS currently provides community-based services to approximately 330,000 persons with developmental disabilities and their families through a statewide system of twenty-one (21) reginal centers, two (2) developmental centers, one (1) community-based facility, and two (2) acute crisis homes. However, the DDS has announced the closing of the three (3) remaining developmental centers. The DDS submitted a closure plan to the Legislature on October 1, 2015, with the goal of closing the Sonoma Developmental Center (SDC), which was closed at the end of 2018. The closure of Fairview DC will follow the closure of Sonoma DC by the end of 2023 and lastly the closure of the General Treatment Area of Porterville DC.

However, this will not affect Riverbank, as these Developmental Centers are located outside of Stanislaus County. Table IV-11~~0~~ is information from the Valley Mountain Regional Center on Developmentally Disabled Residents in the City of Riverbank:

TABLE IV-11~~0~~
Developmentally Disabled Residents by Age
City Of Riverbank

Zip Code Area	0-17 Years	18+ Years	Total
95367	167	130	297
Source: California Department of Developmental Services (DDS), 2022			

As shown in the data above, the age group with the most individuals with a developmental disability is the 0 -17 year age group or 56.2 percent of the total number of developmental disabled residents.

In conclusion, Riverbank must take deliberate steps to close the housing gap for people with developmental disabilities. This includes prioritizing the construction and retrofitting of accessible units, developing supportive housing models, and ensuring that housing policies explicitly consider the needs of people with disabilities. Without such efforts, this population will continue to face housing insecurity and diminished opportunities for independent living within their own community.

TABLE IV-12~~1~~
Developmentally Disabled Residents by Residence Type
City Of Riverbank

Zip Code Area	Home of Parent /Family /Guardian	Independent /Supported Living	Community Care Facility	Intermediate Care Facility	Foster /Family Home	Other	Total
95367	250	12	24	0	<11	<11	>286
Source: California Department of Developmental Services (DDS), 2022							

To assist in providing information to Riverbank residents and the development of housing for persons with developmental disabilities, Program 2.1h has been added to the 2014-2023 Housing Element which requires the City to refer residents to the Valley Mountain Regional Center for information on housing and services designed for persons with developmental disabilities and for the City to pursue monies for construction and rehabilitation of housing for persons with disabilities.

M. FEMALE HEADS OF HOUSEHOLDS

According to the U.S. Census Bureau, American Community Survey, City of Riverbank had a total of 926 are female heads of household or 16.03 percent of all householders in Riverbank (Table IV-132, Female Headed Householders, 2018-2022 ACS). 367 female headed households are considered to be under the poverty level (6.35 percent of all households). Stanislaus County, by comparison, has 26,179 female headed households or 20.12 percent of all householders. These low-income households find it increasingly difficult to find adequate housing since they may have limited incomes that restrict their ability to rent or own large enough dwellings to accommodate their children. Female heads of households often spend more on immediate needs such as food, clothing, transportation, and medical care than on maintaining their dwelling. This may result in living units falling into disrepair and the incidence of poverty is more apparent and difficult to remedy.

TABLE IV-132
Female Headed Householders
City of Riverbank and Stanislaus County – 2018-2022 ACS

	RIVERBANK		STANISLAUS COUNTY	
HOUSEHOLD TYPE	NUMBER	% OF TOTAL	NUMBER	% OF TOTAL
FEMALE HEADED HOUSEHOLDS	**926**	**16.03%**	**26,179**	**20.12%**
FEMALE HEADS WITH OWN CHILDREN	729	12.62%	16,356	12.57%
FEMALE HEADS WITHOUT CHILDREN	197	3.41%	9,823	7.55%
FEMALE HEADED HOUSEHOLDS UNDER THE POVERTY LEVEL	367	6.35%	6,454	4.96%
TOTAL FAMILIES UNDER THE POVERTY LEVEL	**611**	**10.58%**	**14,029**	**10.78%**
TOTAL HOUSEHOLDERS	**5,775**	**100%**	**130,092**	100%

SOURCE: U.S. Census Bureau, 2018-2022 American Community Survey, B17012

Families with female heads of households experience a high incidence of poverty not only in this County, but generally statewide. For Stanislaus County, the incidence of poverty among families headed by women was greater in the unincorporated areas than in the cities.

The availability of housing resources for female-headed households in Riverbank is constrained. Female-headed households, many of which are single-parent households, often face additional financial stress due to lower average incomes.

Female-headed households are particularly vulnerable to economic challenges due to single-income households. Many of these families rely on minimum wage jobs, which may not cover the costs of living in Riverbank, where housing costs are rising. These households are more likely to experience financial instability, which further exacerbates the challenge of securing affordable housing.

N. LARGE FAMILIES

Households of five or more totaled 1,554 for Riverbank in 2022 (Table IV-143, Household Type and Size). Families falling into this category represent a higher percentage of 26.9% compared to the County average of 23.88%. Many large families face difficulty in securing adequate housing because they are in the low- or moderate-income range, and an adequate supply of rental units are unavailable in the market place. Large families are indicative not only of those households that require larger dwellings to meet their housing needs, but also are reflective of a large number that live below the poverty level. Table IV-143 shows that the average persons per household has not changed since 2012. The 2018-2022 American Community Survey shows that 21.24 percent of occupied housing units are considered to be "Large Households" (5 or more persons).

TABLE IV-143
Household Type and Size, 2018-2022 ACS

		RIVERBANK			STANISLAUS COUNTY		
		NUMBER OF HHS	% OF HH TYPE	%OF ALL HHS	NUMBER OF HHS	% OF HH TYPE	% OF ALL HHS
FAMILY HHS	2 PERSONS	1,290	22.34%	17.64%	43,039	33.08%	24.49%
	3 PERSONS	1,575	27.27%	21.53%	29,226	22.47%	16.63%
	4 PERSONS	1,356	23.48%	18.54%	26,753	20.56%	15.22%
	5 PERSONS	874	15.13%	11.95%	16,544	12.72%	9.41%
	6 PERSONS	461	7.98%	6.30%	8,384	6.44%	4.77%
	7 OR MORE	219	3.79%	2.99%	6,146	4.72%	3.50%
	TOTAL FAMILY HH	5,775	100.00%	78.96%	130,092	100.00%	74.02%
	PERSONS PER FAMILY HH	3.71	-	-	3.51	-	-
NON-FAMILY HHS	1 PERSON	1,267	82.33%	17.32%	35,730	78.26%	20.33%
	2 PERSONS	242	15.72%	3.31%	8,223	18.01%	4.68%
	3 PERSONS	24	1.56%	0.33%	1,109	2.43%	0.63%
	4 PERSONS	6	0.39%	0.08%	416	0.91%	0.24%
	5 PERSONS	0	0.00%	0.00%	94	0.21%	0.05%
	6 PERSONS	0	0.00%	0.00%	49	0.11%	0.03%
	7 OR MORE	0	0.00%	0.00%	34	0.07%	0.02%
	TOTAL NON-FAMILY HH	1,539	100.00%	21.04%	45,655	100.00%	25.98%
	PERSONS PER NON-FAMILY HH	1.20	-	-	1.27	-	-
	TOTAL HH	**7,314**	100.00%	100.00%	**175,747**	100.00%	100.00%
	PERSONS PER HH	3.33	-	-	3.01	-	-

SOURCE: U.S. Census Bureau, 2018-2022 American Community Survey, B11016; Department of Finance E-5, 2022.

TABLE IV-154
Persons in Occupied Housing Units
City of Riverbank, 2010 and 2022

PERSONS IN UNIT	TOTAL OCCUPIED HOUSING UNITS	% OF TOTAL OCCUPIED HOUSING UNITS	OWNER OCCUPIED UNITS	% OF TOTAL OWNER OCCUPIED UNITS	RENTER OCCUPIED UNITS	% OF TOTAL RENTER UNITS
2010 CENSUS 1 PERSON	923	14.03%	614	12.92%	309	16.92%
2 PERSONS	1,537	23.36%	1,230	25.88%	307	16.81%
3 PERSONS	1,156	17.57%	854	17.97%	302	16.54%
4 PERSONS	1,294	19.67%	933	19.63%	361	19.77%
5 OR MORE PERSONS	1,669	25.37%	1,122	23.61%	547	29.96%
CITY TOTAL	**6,579**	**100.00%**	**4,753**	**100.00%**	**1,826**	**100.00%**
	PERSONS/OCCUPIED UNIT: 3.19		*PERSONS/OWNER UNIT: 3.15*		*PERSONS/RENTAL UNIT: 3.29*	
2022 CENSUS 1 PERSON	1,267	17.32%	782	15.42%	485	21.63%
2 PERSONS	1,532	20.95%	1,215	23.96%	317	14.14%
3 PERSONS	1,599	21.86%	938	18.49%	661	29.48%
4 PERSONS	1,362	18.62%	1,037	20.45%	325	14.50%
5 OR MORE PERSONS	1,554	21.25%	1,100	21.69%	454	20.25%
CITY TOTAL	**7,314**	**100.00%**	**5,072**	**100.00%**	**2,242**	**100.00%**
	PERSONS/OCCUPIED UNIT: 3.6		*PERSONS/OWNER UNIT: 3.09*		*PERSONS/RENTAL UNIT: 2.98*	

SOURCE: U.S. Census Bureau, 2010 Census, H16; 2018-2022 American Community Survey, B25009

A little more than twelve (12) percent (899) of the 7,314 households in Riverbank have less than 30 percent of the HUD Area Medium Family Income (HAMFI). Of the 899 total households in that income group, 553 or 25 percent are renters.

TABLE IV-165
Income Distribution Overview

Income Level	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
Less than or = 30% HAMFI	346	6.8%	553	24.7%	899	12.3%
31% to less than or = 50% HAMFI	578	11.4%	431	19.2%	1,009	13.8%
51% to less than or = 81% HAMFI	715	14.1%	308	13.7%	1,023	14.0%
81% to less than or = 100% HAMFI	833	16.4%	314	14.0%	1,147	15.7%
101% and above	2,600	51.3%	636	28.4%	3,236	44.2%
TOTAL	5,072	100.00%	2,242	100.00%	7,314	100.00%
SOURCE: *2018-2022 ACS, S2503*						

As with other special needs groups, large families would benefit from innovative multifamily housing development such as co-housing units which may include child care facilities. Large families should also have adequate recreational areas for children and adults near their residences. Housing for large families should also be located near public transit. A program to assist large families with homeownership may also be advantageous. To assist in the development of affordable housing, the City included Program 3.1fg to the Housing Element. In this program, the City shall provide fast-track/priority processing for low-income and special needs housing projects, including large family housing projects, such as the currently approved and constructed Riverbank Central Apartments, a 72-unit affordable housing project along Claus Road.

Large households face higher housing costs due to the need for larger homes. While there are affordable housing units in Riverbank, the demand for these units outpaces supply. As large households typically require homes with three or more bedrooms, the availability of affordable, appropriately-sized units is limited. Female-headed households also often face lower household incomes, making it harder for them to access even affordable units without additional financial support.

For those seeking public housing or rental assistance, wait times for available units can be long. The city's existing affordable housing options, such as those provided through the Stanislaus County Housing Authority, are not sufficient to meet the needs of large and female-headed households. In many cases, applicants may wait years before receiving housing assistance. This gap in availability can lead to overcrowded living situations or forced moves to other areas with lower costs but fewer community resources.

Large households and female-headed households often struggle to find housing in neighborhoods that offer the resources and services they need, such as good schools, access to transportation, and proximity to work opportunities. The lack of diverse housing options in Riverbank limits the ability of these households to find suitable homes within their budget.

O. FARMWORKERS

Stanislaus County places farmworkers into two categories: (1) those regular or year-round farm laborers employed for more than 150 days annually, and (2) those seasonal and migrant farm workers who travel more than 50 miles across County lines to obtain agricultural employment and reside in the County approximately six months of the year. Statistics concerning the number of farmworkers employed in Stanislaus County assumed from the 2022 USDA Ag Census. The Census identifies the number of employees in a given occupation group, in this case, farming, fishing, and forestry. There are no fishing or forestry industries in the City, therefore the number can be used to show farmworker employment. Table IV-176 on the next page shows the estimated number of farmworkers in 2022 from the Ag Census.

TABLE IV-17~~6~~
Estimated Number of Farmworkers
Stanislaus County, 2022

	Hired Farm Labor - 2022
	Number
Farms	1,387
Workers	12,064
$1,000 Payroll	363,542
	Farmworkers by Days Worked
	Number
150 Days or more	
Farms	924
Workers	7,384
Farms with 10 or more Workers	
Workers	5,418
Fewer than 150 Days	
Farm	854
Workers	4,680

SOURCE: 2022 Ag Census, http://agcensus.usda.gov/index.php

As is the case for most low-income households, housing needs of farmworkers far exceed government's ability to provide assistance. The USDA Rural Development, State HCD, and Office of Migrant Services supply housing assistance for the farm workers. Because farm workers are of low income and their employment status is often tenuous, they are unable to compete for housing on the open market. The housing that is available is often of substandard condition and located in areas of the community lacking adequate services. In relation to their low incomes, farmworkers often overpay for substandard housing and live in crowded conditions. The City has amended the Riverbank Municipal Code to add employee housing (which includes Farmworker Housing) as a permitted use in the R-1 Zone, completing Program 2.1h of the 2014-2023 Housing Element.

According to the 2022 Farmworker Health in California Report, farmworkers in California face significant challenges related to income, health outcomes, and housing disparities. Many experience wage theft, with 19% reporting they were not paid their full wages, and 15% stating they did not receive the required rest breaks. A majority (68%) are employed by farm labor contractors rather than directly by growers, which often results in lower wages and reduced benefits. The median annual wage for farmworkers is only $16,000, considerably lower than the reported state median of $21,915 for agricultural workers. Financial insecurity is widespread, with nearly two-thirds (62%) struggling to pay for food or bills, and only 41% of farmworkers qualifying for unemployment benefits.

Health outcomes for farmworkers are concerning, as 36% rated their health as fair or poor, and many suffer from chronic conditions such as diabetes (20%), hypertension (19%), and anxiety (10%).

Obesity is a significant issue, with self-reported data indicating that 31% of farmworkers are overweight and 43% are obese, while actual physical measurements show an even higher obesity rate of 59%. Farmworkers face daily risks due to extreme heat exposure and pesticide contact, yet many do not receive proper training or protective equipment. Mental health concerns are also prevalent, with 19% reporting frequent anxiety and 14% experiencing depression or hopelessness.

Housing conditions further exacerbate these difficulties, as 92% of farmworkers rent their homes, and overcrowding is common. More than half share a room with at least one other person, and 25% sleep in rooms with three or more people. Many report poor housing conditions, with 37% experiencing bad-tasting water, while others deal with mold, rotting wood, and pest infestations. Extreme temperatures in housing pose another challenge, with 39% struggling to keep their homes cool and 36% finding it difficult to stay warm.

The impact of COVID-19 has been severe, with 60% of farmworkers testing positive and 40% suffering from long-term health effects. Many workers fear retaliation (64%) if they report unsafe conditions, which discourages them from advocating for better workplace protections. Healthcare access remains a major issue, as nearly half (49%) of farmworkers were uninsured at some point in the past year. Given these challenges, the report calls for stronger labor protections, improved access to healthcare, and more rigorous enforcement of workplace safety laws to address the growing disparities faced by farmworkers in California.

TABLE IV-18~~7~~

Farm Labor and Migrant Housing
Stanislaus County

USDA RURAL DEVELOPMENT	TOTAL # OF UNITS	# OF RENT ASSISTED UNITS	% OF RENT ASSISTED UNITS	LOCATION	RESTRICTIVE CLAUS EXPIRATION
El Solyo Village	46	27	58.70%	Patterson	
Garden Apartments	42	41	97.62%	Oakdale	2042
Oakdale Apartments	42	39	92.86%	Oakdale	2045
Oakridge Apartments	41	40	98.00%	Oakdale	2041
Patterson Place Apartments	40	39	98.00%	Patterson	2043
Ram Farms Inc	1	0	0.00%	Hughson	2039
Riverview Gardens	42	41	97.62%	Riverbank	2043
Stanislaus Flh Ctr Modesto	355	177	50.00%	Modesto	2050
Sunrise Vista Apartments	24	18	75.00%	Waterford	2032
Waterford Garden Apartments	51	36	71.00%	Waterford	2042
Westley-Patterson Migrant Center	92	92	100.00%	Patterson	2024
Willow Pointe Apartments	25	24	96.00%	Riverbank	2035
Total	**801**	**574**	**71.66%**	-	-

SOURCE: Policymap.com

In Stanislaus County, farm workers are housed predominantly in farm labor camps owned and operated by the Stanislaus County Housing Authority and camps privately owned in the unincorporated areas. Table IV-187 indicates where the USDA Rural Assisted Housing Provisions which allow for the housing of farm workers include permanent residential buildings and mobile homes. Permits are issued with the stipulation that the occupant be employed on a full-time basis in conjunction with farming operation. Both mobile homes and farm labor camps provide important housing for seasonal or year-round workers who may otherwise have a difficult time obtaining housing at an affordable price and within close proximity to their jobs.

According to the Bureau of Labor Statistics report on the Farmworkers and Laborers, Crop, Nursery, and Greenhouse occupation, dated May 2022, the Modesto Metropolitan Area has 5,860 people employed in these occupations, including farmworkers and laborers. The hourly mean wage is $16.62 and the annual mean wage is $34,580. More specifically, the 2018-2022 American Community Survey reports that there are 521 people employed in the Agriculture, forestry, fishing and hunting, and mining industry within the City of Riverbank. However, as Table IV-17 depicts, the lack of farmworker housing is apparent, as Riverbank only has two (2) rent assisted projects (Riverview Gardens and Willow Pointe Apartments). To encourage and fulfil this need, Program 2.1de and 2.1ef has been included in the Housing Element. Program 2.1e requires the City to assist in the development of housing for farmworkers. Actions include site identification assistance and City support of applications for funding. In addition, the City will post information on the City's website related to site inventory, housing programs, and grant information. Program 2.1dh requires the City to work with the agricultural community, housing providers and agricultural groups to develop and build year-round and seasonal agricultural worker housing. The City will also contact developers with information in a manner conducive for developing the actual units.

P. EMERGENCY HOUSING/HOMELESS

Some of the main causes of homelessness are the breakdown of the traditional social relationships, unemployment, shortage of extremely low- and low-income housing and the de-institutionalization of the mentally ill. A homeless count was conducted on January 26, 2023 by the Stanislaus County Housing Authority, in cooperation with Riverbank Police Services. This survey concluded that, in Riverbank, eighteen (18) homeless people were observed. Homeless persons in Stanislaus County tend to be transient in nature, many moving to larger cities (e.g. Turlock and Modesto) where more services are available.

According to Government Code 65583, at least one zoning district shall permit emergency shelters without a conditional use permit. Emergency Shelters may be considered "dwelling groups" and are thus allowed by right in the R-3 zoning district, and with a conditional use permit in the C-1, C-2, and CM zoning districts (See Table D-1, Residential Types Permitted by Zone).

Emergency shelters ~~will~~ are only be subject to those development and management standards that apply to other residential development within the same zone. The City does not require any additional development standards for emergency shelters. However, Program 3.1j requires the City to update the Zoning Ordinance to establish objective standards for emergency shelters.

There are 11.02~~12.09~~ acres of undeveloped and underutilized land zoned R-3 within Riverbank's city limits, which would provide sufficient capacity to accommodate the need for emergency shelters. On February 10, 2015, City Council adopted Ordinance No. 2015-002 permitting Emergency Shelters, Transitional Housing and Supportive Housing to be a permitted use in the Multiple-Family Residential District R-3 Zone and a Permitted Use with a Use Permit in the Neighborhood Commercial District C-1 Zone, General Commercial District C-2 Zone and Commercial-Industrial C-M Zone. Supportive housing is permitted by-right in R-1, R-2, and R-3 districts. Program 2.1o has been added to update the zoning code to make supportive housing a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.

The Zoning Code 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. No individual or household may be denied emergency shelter because of an inability to pay".

Assembly Bill (AB) 101 requires a low barrier navigation center be a use by right in areas zoned for mixed use and nonresidential zones permitting multifamily uses if it meets specific requirements, including access to permanent housing, use of a coordinated entry system, and use of Housing First according to Welfare and Institutions Code Section 8255 (Government Code Section 65662). A low barrier navigation center is defined as "a Housing First, low barrier, temporary, service-enriched shelter focused on helping homeless individuals and families to quickly obtain permanent housing. Low barrier includes best practices to reduce barriers to entry, such as allowing partners, pets, storage of personal items, and privacy". Currently, the City's Municipal Code does not include the definition of low barrier navigation centers or permit low barrier navigation centers in appropriate Zoning Districts per State law. As such, Program 3.1j has been added to allow low barrier navigation centers by right in all areas zoned for mixed use and nonresidential zones permitting multifamily uses, consistent with AB 101.

The following tables provided indicate the type of Homeless Facilities available. The numbers provided are for the Turlock/Modesto/Stanislaus County Continuum of Care. Numbers represent homeless needs for the total Continuum of Care area.

To better serve the homeless population (transient and otherwise) within the City of Riverbank, Program 2.1~~ik~~ has been added to the Housing Element, requiring the City to participate in the Stanislaus County Housing and Supportive Collaborative (SCHSCC) and

the Continuum of Care to help address homeless needs in Riverbank and Stanislaus County. The City will select a point-of-contact for the City within one (1) year of Housing Element adoption.

TABLE IV-1~~98~~
Homeless Facilities - 2023

Facility Type	Family Beds	Adults Only Beds	Child Only Beds	Total Year Round Beds	Seasonal
Emergency Shelter	211	672	43	926	125
Transitional Housing	92	146	0	238	0
Permanent Supportive Housing	225	480	0	705	0
Total	528	1,298	43	1,869	125

SOURCE: Continuum of Care or HUD, 2007-2023 HIC Counts

TABLE IV-20~~19~~
Homeless Needs

	2022	2023
Total Homeless	1,857	2,091
Total Sheltered	911	1,142
Total Unsheltered	946	937
Total Chronically Homeless	493	573
Total Chronically Sheltered	197	257
Total Chronically Unsheltered	296	316

SOURCE: Continuum of Care or HUD

Q. AGENCIES OFFERING EMERGENCY HOUSING ASSISTANCE

1. Salvation Army, Social Service Program - Under this program, renter's assistance, energy bill assistance, as well as housing information and referral are provided to low-income families. Also, families facing eviction are given a first month's rent allowance and are assisted in finding permanent housing.

2. Stanislaus Regional Housing Authority - The Stanislaus Regional County Housing Authority is located at 1701 Robertson Road, Modesto. The Housing Authority develops and operates subsidized housing facilities in Stanislaus County (with the exception of Riverbank, which has its own Housing Authority) for very-low and low-income families, including the elderly, handicapped and disabled families. The Authority also offers counseling for rent delinquency and mortgage delinquency at no charge, under license from the Housing and Urban Development Agency.

3. Modesto Gospel Mission – Under this program, shelter services are provided 225 beds every night for men, women, and children each year. They offer shelter for men; men with children, women; women with children; and, as available, families. They also partner with a local animal shelter for the family dog to be sheltered.

4. Hutton House – Hutton House is Stanislaus County's only shelter for runaway and homeless youth. While at the shelter clients receive basic residential services, as well as individual, group, and family counseling. The program goal focuses on getting youth off the street and reunited with their families.

5. Children's Crisis Center – This program's mission is to provide child abuse prevention, intervention, and shelter services to abused, neglected and high-risk children living in Stanislaus County and its surrounding communities. The Children's Crisis Center is a private, non-profit organization established in 1980 solely to protect local children threatened by their own family circumstances. This program offers a broad range of services including respite, shelter, emergency childcare, crisis counseling and empathetic support to protect high risk children and help abusive families achieve meaningful change.

R. PERSONS REQUIRING TEMPORARY SHELTER (HOMELESS)

1. Emergency and Transitional Shelter Needs - The housing needs of those seeking emergency shelter and/or transitional shelter have dramatically increased in the last ten years. The fastest growing population in need of shelter is families with children. The reason for this increase can be attributed to rising unemployment and the decline in affordable housing. A large percentage of mentally ill persons are homeless due to the relaxing of guidelines for state mental health care institutions. Others in need are homeless persons with drug and alcohol problems, battered women and children, teenage runaways, and evicted tenants.

2. Agencies Providing Temporary Shelter - The following programs offer cash or vouchers to homeless individuals and families for securing temporary shelter:

a. Community Temporary Shelter Service Coalition - Since 1981, the Community Temporary Shelter Service Coalition (CTSSC) has provided services for those seeking shelter. CTSSC provides temporary shelter to those with immediate need. CTSSC assists families with dependent children and the mentally ill homeless. Stay is temporary, in motels or shelters until more permanent shelter can be found. CTSSC contracts with the Stanislaus County Department of Social Services to find temporary shelter for the AFDC Homeless Assistance Program.

CTSSC receives block grant funding to find shelter for the Mentally Ill Homeless Program. The Program is administered by the Stanislaus County Mental Health Department. The Program provides shelter for stays of three to seven days, based on need, and then many individuals are placed in board and care facilities. ~~For the FY 22/23, this program provided XXX shelter nights with some stays up to seven nights.~~

b. AFDC Homeless Assistance Program (HAP). This program provided temporary shelter for families who qualify for Aid to Families with Dependent Children and is administered by the Stanislaus County Department of Social Services. Benefits are paid for 21 days, with 28 days being the maximum for extenuating circumstances as defined by the Social Services Department.

In addition, the Stanislaus County Department of Social Services along with the Salvation Army provides a variety of referrals and medical services to the homeless through the Stanislaus Homeless Health project.

S. AGENCIES PROVIDING SHELTER AND/OR SERVICES AND/OR MEALS

The following facilities provide shelter and/or meals and services to the homeless population.

1. Adult Protective Services - This is a function of the County's Welfare Department and they provide information and act as a referral agency for those in need of help for emergency housing, money, food, mental problems, and alcoholism. Their primary function is to access a person's immediate problems, and link that person with the appropriate agency for further help.

2. County's General Hospital - This County facility provides, as mandated by law, the delivery of medical attention to indigent and those unable to pay for such services.

3. General Assistance/Aid to Families with Dependent Children - These two functions of

the County's Welfare Department provide cash assistance to single individuals and families based on qualifying criteria. For those in need of emergency housing, they are placed either in motels or board and care homes until additional assistance can be obtained.

The above-mentioned agencies are only some of the more recognized agencies dealing with the emergency housing/homeless issue. This is not an exhaustive matter. The problems are more acute in the winter than in the summer months. A number of people being assisted in this County are the pass through individuals with destinations in other counties or states. They may stop for food or shelter, then move on as evidenced by agency experience in the County. Many of the able bodied people never seek help and consequently are not reflected in reports on the homeless.

In summary, the matter of homeless and emergency housing is not a major issue or problem in the City of Riverbank. In the rural areas, those who are considered strangers and anyone without shelter are usually reported to the Sheriff's Department. Those in need of help or anyone considered a nonresident are referred to an appropriate agency for assistance. The rural area of the County does not provide amenities or have the resources to accommodate emergency housing and the homeless. All of those agencies are in urban areas and, henceforth, those in need of assistance are referred there.

4. Haven Women's Center of Stanislaus – Haven offers a variety of supportive services designed to aid victims in crisis following a traumatic incident and with their longer-term planning and goal setting.

5. Family Justice Center – The Stanislaus Family Justice Center is a one-stop center offering help and hope for victims and survivors of domestic violence, sexual assault, child abuse, and elder abuse.

24-hour Trauma Response. Advocates are dispatched to hospital emergency rooms 24-hours a day, 7 days a week, in response to calls from law enforcement or emergency room personnel. The advocate responds to provide support, advocacy and information to victims of sexual assault or domestic violence in the emergency room setting.

Case Management. Haven offers the services of case managers to assist in developing personal goals toward violence-free life and finding resources and tools to achieve those goals.

Behavioral Health Services (BHS). The StanWORKSs Behavioral Health Services program is designed for TANF recipients in achieving and maintaining employment. The BHS program provides a variety of services including assessment, treatment, groups, and on-going case management.

SECTION V
Affirmatively Furthering Fair Housing

A. BACKGROUND

The State of California's 2018 Assembly Bill 686 (AB 686) requires that all public agencies in the state Affirmatively Further Fair Housing (AFFH) beginning January 1, 2019. Public agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD) are also required to demonstrate their commitment to AFFH. The Federal obligation stems from the fair housing component of the Federal Civil Rights Act mandating Federal fund recipients to take "meaningful actions" to address segregation and related barriers to fair housing choice.

AB 686 requires all public agencies to "administer programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing and takes no action inconsistent with this obligation."

AB 686 also makes changes to Housing Element law to incorporate requirements to AFFH as part of the housing element and General Plan to include an analysis of fair housing outreach and capacity, integration and segregation, access to opportunity, disparate housing needs, and current fair housing practices.

"Affirmatively Furthering Fair Housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions, that taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty of affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development." (Government Code § 8899.50 subd.(a)(1)).

AB 686 requires the City, and all jurisdictions in the state, to complete three major requirements as part of the housing element update:

- Include program that affirmatively furthers fair housing and promotes housing opportunities throughout the community for protected classes.
- Conduct an assessment of fair housing that includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify patterns of segregation or other barriers to fair housing, and prioritization of contributing factors to fair housing issues.

- Prepare the housing element land inventory and identification of sites through the lens of affirmatively furthering fair housing.

Sources of Information

- U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) reports;
- U.S. Census Bureau's Decennial Census and American Community Survey (ACS);
- Stanislaus County Analysis of Impediments to Fair Housing Choice, dated May 12, 2020;
- HCD's AFFH Data Viewer; and
- Local knowledge.

B. ASSESSMENT OF FAIR HOUSING

The California Government Code Section 65583(10)(A)(ii) requires the City of Riverbank to analyze disparities in access to opportunity, areas of segregation, racially or ethnically concentrated areas of poverty, and disproportionate housing needs, including displacement risks. The California Department of Housing and Community Development (HCD) released a technical memorandum and compliance checklist in April 2021 to guide jurisdictions on addressing this requirement in housing elements. The AFFH analysis must contain the following, which are covered in this Chapter unless otherwise noted below:

- Community Outreach – Discussed in Chapter I, *Introduction*
- Assessment of Past Goals, and Implementation Programs – Discussed in ~~Chapter~~ Section IX~~VIII~~, ~~*Review*~~ *Evaluation* *of Previous Housing Element*
- Assessment of Fair Housing
    - ~~Background Information~~
    - Fair Housing Enforcement and Outreach Capacity
    - Integration and Segregation ~~Patterns and Trends~~
    - Racially or Ethnically Concentrated Areas of Poverty ~~(R/ECAPs)~~
    - Disparities in Access to ~~Opportunity~~Opportunities
    - Disproportionate Housing Needs ~~and Displacement Risk~~
    - Local Area Knowledge
    - Other Relevant Factors
    - Subsidized Housing
    - ~~Special Housing Needs~~
- ~~Identification of Contributing Factors~~

- Site Inventory Analysis ~~– Discussed in Chapter III, *Existing Housing Needs*~~
- Contributing Factors and Meaningful Actions
- Meaningful Actions to Address Fair Housing Issues
- ~~Goals and Programs – Discussed in Chapter IX, *Housing Element Goals, Policies, and Housing Action Plan*~~

This ~~Chapter~~ Section provides a focused analysis of fair housing issues in Riverbank. This includes an Assessment of Fair Housing and identification of Contribution Factors. Affirmatively furthering fair housing as described in terms of Outreach, Site Selection, and Policy Development. Site selection of opportunity sites inventory addressing fair housing needs are detailed below ~~in Chapter X~~ and Goals and Programs in Chapter ~~I~~X, *2023 – 2031 – Housing Goals and Policies*.

1. Fair Housing Enforcement and Outreach Capacity

Fair housing complaints can be used to indicate the overall magnitude of housing complaints and identify characteristics of households experiencing discrimination in housing. Pursuant to the California Fair Employment and Housing Act [Government Code § 12921 (a)], 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."* Federal Law also prohibits many kinds of housing discrimination. Housing discrimination complaints can be directed to either HUD's Office of Fair Housing and Equal Opportunity (FHEO) or the California Department of Fair Employment and Housing (DFEH).

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 (including gender identity and sexual orientation), or other characteristics when renting or selling a housing unit.

- Disproportionate housing needs, including cost burden, overcrowding, substandard housing, and risk of displacement.

The Analysis of Impediments to Fair Housing Choice (AI) was developed to identify the potential barriers ("impediments to fair housing choice") that residents of Stanislaus County may face by exploring housing, demographic, fair housing data, and neighborhood opportunity for outward signs of housing discrimination and indicators of patterns that may not be obvious. The Stanislaus County Regional AI was created as a collaborative document between the Stanislaus Regional Housing Authority, Stanislaus Urban County (including the cities of Ceres, Hughson, Newman, Oakdale, Paterson, Riverbank, and Waterford), the City of Modesto, and the City of Turlock.

According to the Stanislaus County Regional AI, the Department of Fair Employment and Housing (DFEH) is responsible for enforcing fair housing laws along with the HUD Office of Fair Housing and Equal Opportunity (HUD FHEO). Residents of Riverbank who feel they have been a victim of housing discrimination can submit their complaint to either agency. Information about housing discrimination complaints to DFEH and HUD is tracked annually by each agency.

Additionally, Stanislaus County has a number of local resource and enforcement organizations:

- **Stanislaus Regional Housing Authority:** a nonprofit, public corporation, is committed to addressing the unmet housing needs of residents and communities in Stanislaus County.

- **Fair Housing Council of Central California**: a professional, non-profit, civil rights organization dedicated to the elimination of discrimination in housing and the expansion of housing opportunities for all persons. The Center accomplishes it goal through the advocacy of equal housing opportunities, assisting victims of housing discrimination and enforcing compliance with fair housing laws, including the Community Reinvestment Act and the Equal Cred Opportunity Act.

- **Public Interest Law Project:** a nonprofit support center for California legal services and other public interest law programs. The California Affordable Housing Law Project (CAHLP) is a project of the Public Interest Law Project. CAHLP concentrates primarily on the enforcement of California's housing element and redevelopment statutes and of state and federal relocation assistance and fair housing laws.

- **Coalition of Homeless Service Providers:** advocate on the subject of homelessness with policy makers, public funders, and those with lived experience.

- **California Rural Legal Assistance (CRLA):** a nonprofit legal service program created to help California's low-income individuals and communities. CRLA provides low-income rural Californians with free legal assistance and a variety of community education and outreach programs.

- Half of its resources are committed to multi-client cases that grapple with the root causes of poverty, with the goal of improving conditions for farmworkers, single parents, school children, the elderly, people with disabilities, and entire communities.

The National Fair Housing Alliance (NFHA) identifies three (3) significant trends in 2020 that are relevant to the City of ~~Waterford~~Riverbank:

- First, fair lending cases referred to the Department of Justice from federal banking regulators have been declining, indicating the state and local government entities may want to play a larger role in examining fair lending barriers to homeownership.

- Second, NFHA identified a significant increase in the number of complaints of harassment – 1,071 complaints in 2020 compared to 761 in 2019; and

- Finally, NFHA found that 73 percent of all fair housing complaints in 2020 were processed by private fair housing organizations, rather than state, local, and federal government agencies – reinforcing the need for local, active fair housing organizations and increased funding for such organizations.

Between 2014 and 2019, 249 fair housing complaints were filed with Project Sentinel, which has an office in the City of Modesto. Of the 249 complaints, 1 was filed by a Riverbank resident. Although Riverbank is only 4.0 percent of the County's population, they contributed to less than 1 percent of the County's complaints. Table V-1 demonstrates the complaints filed in Stanislaus County and the type of complaint filed. Of the 249 complaints, the majority (190) were related to discrimination complaints due to a disability.

TABLE V-1
STANISLAUS COUNTY FAIR HOUSING COMPLAINTS
2014 - 2019

Complaint	Number
Age	4
Arbitrary	1
Disability	190
Familial Status	27
Gender/Sex	21
National Origin	13
Race	24
Religion	2
Sexual Orientation	4
Source of Income	2
Source: Stanislaus County, Regional Analysis of Impediments to Fair Housing Choice, Fiscal Year 2020-2025	

Currently, Riverbank provides information on filing Fair Housing complaints by contacting the City's Housing staff at (209) 863-7126 or in person at 6707 Third Street, Suite C, Riverbank.

Compliance with State Fair Housing Law
The City of Riverbank complies with existing fair housing laws and regulations by ensuring that all residents have equal access to housing programs, services, and resources and supporting residents in filing complaints on housing discrimination. The City has not been alleged or found in violation of the following:

- **Fair Housing Act of 1968 –** The City has adopted housing policies that prohibit housing discrimination based on protected characteristics and ensuring equal access to housing programs and services.

- **California Fair Employment and Housing Act (FEHA) –** The City complies with FEHA 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 with to pursue legal action.

- **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. Further, the City has received zero FHEO complaints and is committed to conducting outreach and educating residents on Fair Housing Laws. Program 5.1a~~8.2~~ of this Housing Element commits the City to providing information on fair housing and directing complaints to FHEO.

- Government Code Section 8899.50 – This section of this Housing Element documents compliance with Affirmatively Furthering Fair Housing requirements.

- **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~~ 2.1a through ~~5.11~~2.1l in this Housing Element to promote affordable housing opportunities and resources.

- **Assembly Bill 686 –** The City has included this assessment of fair housing and identifies strategies to increase housing opportunities for all residents, with specific actions to reduce housing disparities for disadvantaged communities.

- **Density Bonus Law –** The City~~ last~~ updated the ~~Density Bonus Chapter~~Affordable Housing Density Bonus Section (~~Chapter~~Section ~~17.34~~153.185) of the ~~Waterford~~ Riverbank Municipal Code in ~~2011~~2015 (Ordinance No. 2015-003). ~~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 State Density Bonus Law. Program 6.11 will regulate this amendment to the Code.~~The Affordable Housing Density Bonus Section references State law, specifically Section 65915 of the Government Code. To promote the use of Density Bonus, Program 2.m has been added to this Housing Element.

- **Senate Bill (SB) 35 –** The City is subject to SB 35 requirements and will comply with State law as established in this Housing Element through Program ~~6.15~~2.1n.

- **Rehabilitation Act of 1973 –** The City does not discriminate against persons with disabilities and promotes equal opportunities, accessibility, and independence for individuals with disabilities.

- **American Disabilities Act –** ~~Chapter 41~~Section 153.221 through 153.228 of the City's Municipal Code establishes procedures for persons with disabilities seeking equal access to housing including reasonable accommodation for persons with disabilities. The City ensures housing developers comply with the American Disabilities Act through the permit review process. The City includes Program ~~5.9~~2.1o to promote and provide regulatory incentives for below-market rate housing or services.

- **Housing Accountability Act (Gov. Code Section 65589.5)** – requiring adoption of a Housing Element and compliance with RHNA allocations – the City will comply with the Housing Accountability Act by approving any eligible housing development projects, including those with at least 20 percent affordable units to lower-income households.

- **No Net Loss Law (Gov. Code Section 65863) –** requiring that adequate sites be maintained to accommodate unmet RHNA allocations – the City complies with the No Net Loss Law by identifying sites that can accommodate the City's RHNA.

- **Limits on Growth Control Laws (Gov. 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.

- **Housing Element Law (Gov. Code Section 65583(c)(5),(c)(10)** – The City has included this analysis of fair housing and identifies strategies to increase housing opportunities for all residents, with specific actions to reduce housing disparities for lower-income households.

- **Least Cost Zoning Law (Gov. Code Section 65913.1) –** The City complies with this State Law by designating and zoning sufficient vacant land for residential use with appropriate standards, in relation to zoning for nonresidential use, and in relation to growth projections of the General Plan to meet housing needs for all income categories as identified in this Housing Element.

- **Excessive Subdivision Standards Law (Gov. Code Section 65913.2)** – The City complies with this law in that the jurisdiction does not impose criteria for design, as defined in Section 66418 or improvements, as defined in Section 66419, for the purpose of rendering infeasible the development of housing for any and all economic segments of the community.

Ability to Address Complaints

The City refers fair housing complaints to the U.S. Department of Housing and Urban Development (HUD). According to the HUD's Office of Fair Housing and Equal Opportunity (FHEO), between 2013 and 2022, no fair hosing complaints were filed with the FHEO in Riverbank.

The City does not have sufficient staffing and financial resources to adequately address fair housing concerns. The City will collaborate with regional agencies, fair housing providers, organizations, and other jurisdictions within the County to address housing needs, including fair housing outreach and services, as specified in Program 5.1a.

2. Integration and Segregation

To inform priorities, policies, and actions, the housing element must include an analysis of integration and segregation, including patterns and trends. Integration generally means a condition which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability in a specific geographic area. Segregation generally means the opposite condition, where concentrations of the characteristics described above are high in a specific geographic area.

Residential segregation and exclusion, whether by race, ethnicity, disability, or income, is a result of numerous housing policies, practices, and procedures – both by public and private – that have had enduring and pervasive negative impacts. Overt and covert housing discrimination through land use policy, shifting housing markets, and patterns of investment and disinvestment, have restricted meaningful fair housing choice and equitable access to opportunity, particularly for communities of color.

Historic patterns of segregation persist in California despite the long-standing federal mandate, established by the Fair Housing Act of 1968, that federal agencies and federal grantees affirmatively further the purposes of the FHA.

Past and present discriminatory policies and practices, including long-term disinvestment, have resulted in neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems. In addition, governmental policies have subsidized the development of segregated, high-resourced suburbs in metropolitan areas by constructing new highway systems – often through lower income communities of color – to ensure access to job opportunities in urban centers. This physical and policy infrastructure supports patterns of discrimination and high levels of segregation that continue to persist in California and across the country. All of these conditions persist despite the over 50-year-old obligation to prohibit discrimination and affirmatively further fair housing.

Understanding the demographic, ethnic, and racial composition of a city is vital to ensuring equal opportunity to housing for all groups. This section provides an overview of racial/ethnic composition and segregation patterns within Stanislaus County and ~~Waterford~~Riverbank. The HCD Data Viewer, drawing from U.C. Census, American Community Survey (ACS), and other date sources, provides a depth of resources to better understand patterns of affluence, poverty, segregation, and integration.

~~**Additional Analysis**~~

~~**This Section will be updated further with more detailed analysis being requested by HCD.**~~

Race and Ethnicity

Hispanic/Latino residents comprise the largest racial/ethic group at 59 percent of the City's residents, while white residents comprise of approximately 31 percent of the population. Asian American/Pacific Islander residents comprise 5 percent of the population. The percentage of Hispanic/Latino residents is higher than observed trends across Stanislaus County (49 percent). Riverbank also has a higher than observed of non-white residents compared to the County. Throughout Riverbank, the non-white population ranges between 60 – 80 percent in the majority of the census block groups (Figure V-1). However, the Crossroads neighborhood and the northwestern portion of the City has less percentage of non-white population at 20 – 40 percent.

In contrast, the eastern portion of the City of Riverbank has a non-white population of 60 – 80 percent. This is similar to the eastern part of Stanislaus County, and the City of Oakdale where the south eastern portion of Oakdale has a non-white population of 60 – 80 percent.

From 2010 to 2023, the racial diversity in Riverbank remained comparable. During this time period, the percent of Hispanic/Latino residents increased by approximately 6 percent, while the percentage of white residents decreased by 6 percent. The percentage of Asian American/Pacific Islander residents increased by 1.3 percent and Other or Multiple Races increased by 0.8 percent. The City's small population of Black/African American residents deceased by 1.3 percent and the Native American/Native Alaskan population remained relatively the same between 2010 and 2023. Hispanic/Latino residents remained the largest racial/ethnic group in the County. This is higher than the Northern San Joaquin Valley (SJV) region, where Hispanic/Latino residents made up approximately 47 percent of the population.

TABLE V-2
POPULATION BY RACIAL GROUP (CITY OF RIVERBANK)
2010 – 2023

	Percent by Population	
Race	**2010**	**2023**
Hispanic/Latino (of any race)	53.3%	59.1%
Not Hispanic/Latino		
White	37.3%	31.0%
Asian American/Pacific Islander	3.7%	5.0%
Other or Multiple Races	1.9%	2.7%
Black/African American	3.2%	1.9%
Native American/Native Alaskan	0.5%	0.4%
Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Data (2006-2010, 2019-2023), Table DP05		

The AFFH Data Viewer identifies the degree in which areas have a predominant racial/ethnic majority. The predominant racial/ethnic group in each census tract is that with the largest population. The majority of the City has a predominant population of Hispanic/Latino (Figure V-2). The Crossroads neighborhoods (Crossroads and Crossroads West) and the western portion of the City have a predominant population of White.

According to the Othering and Belonging Institute (OBI) racial segregation/integration data, central Riverbank, west of the Union Pacific Railroad (UPRR) is considered Racially Integrated, while central Riverbank, east of UPRR has a Low-Medium Segregation. The eastern and southwestern portions of the City does not have racial segregation data available (Figure V-3).

Figure V-1 Percent of Total Non-White Population (City of Riverbank)

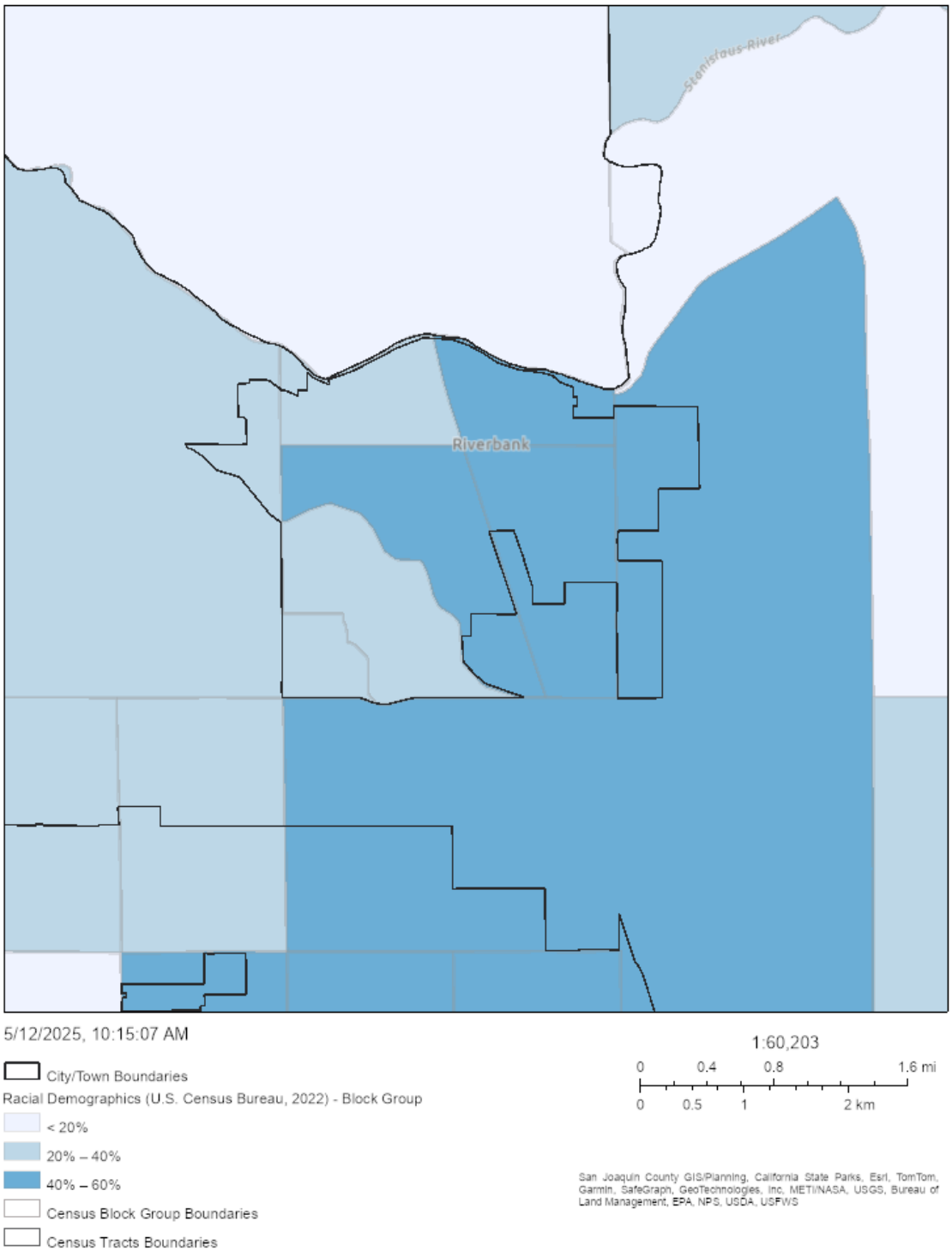


Figure V-2 Predominant Populations (City of Riverbank)

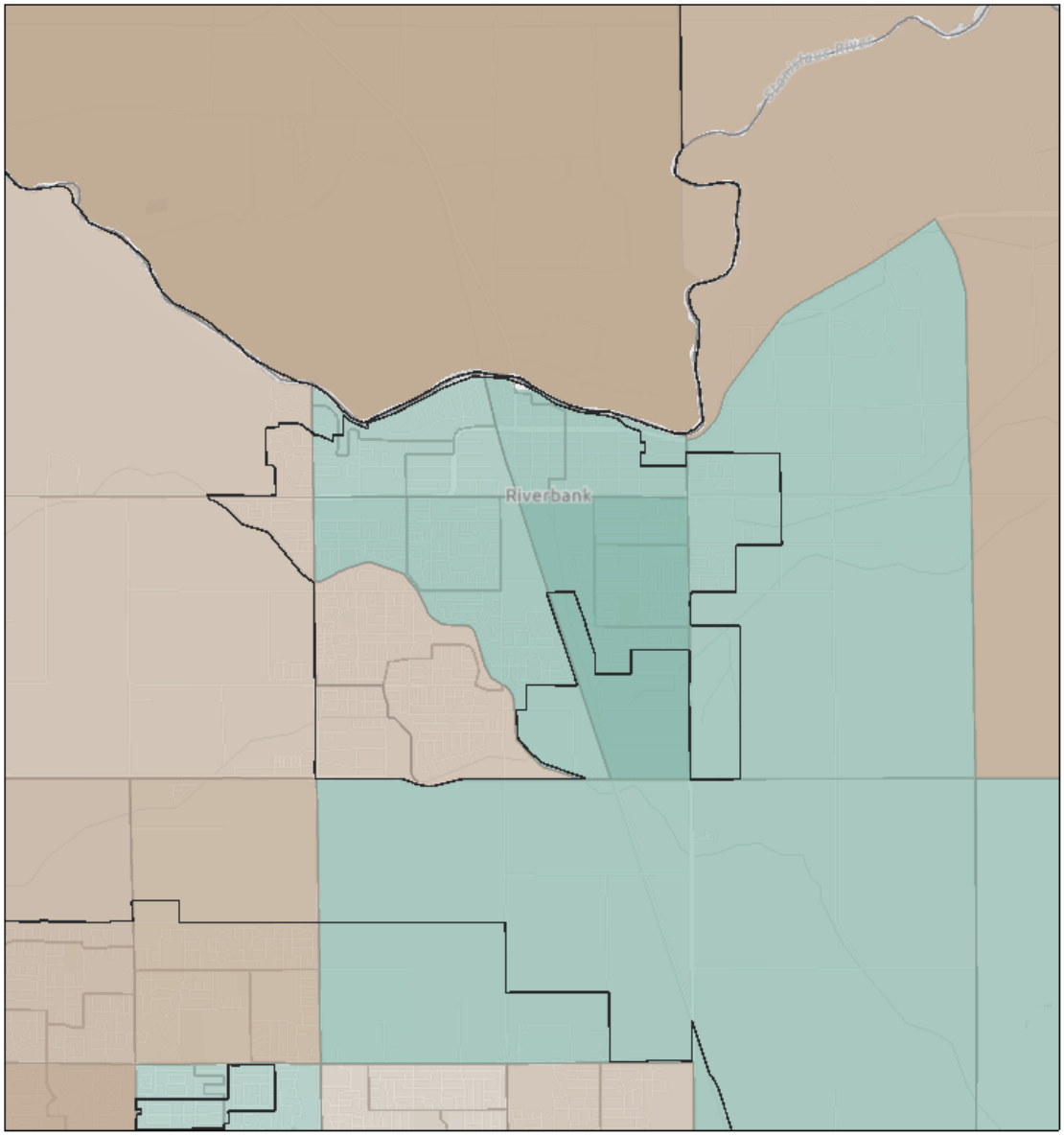
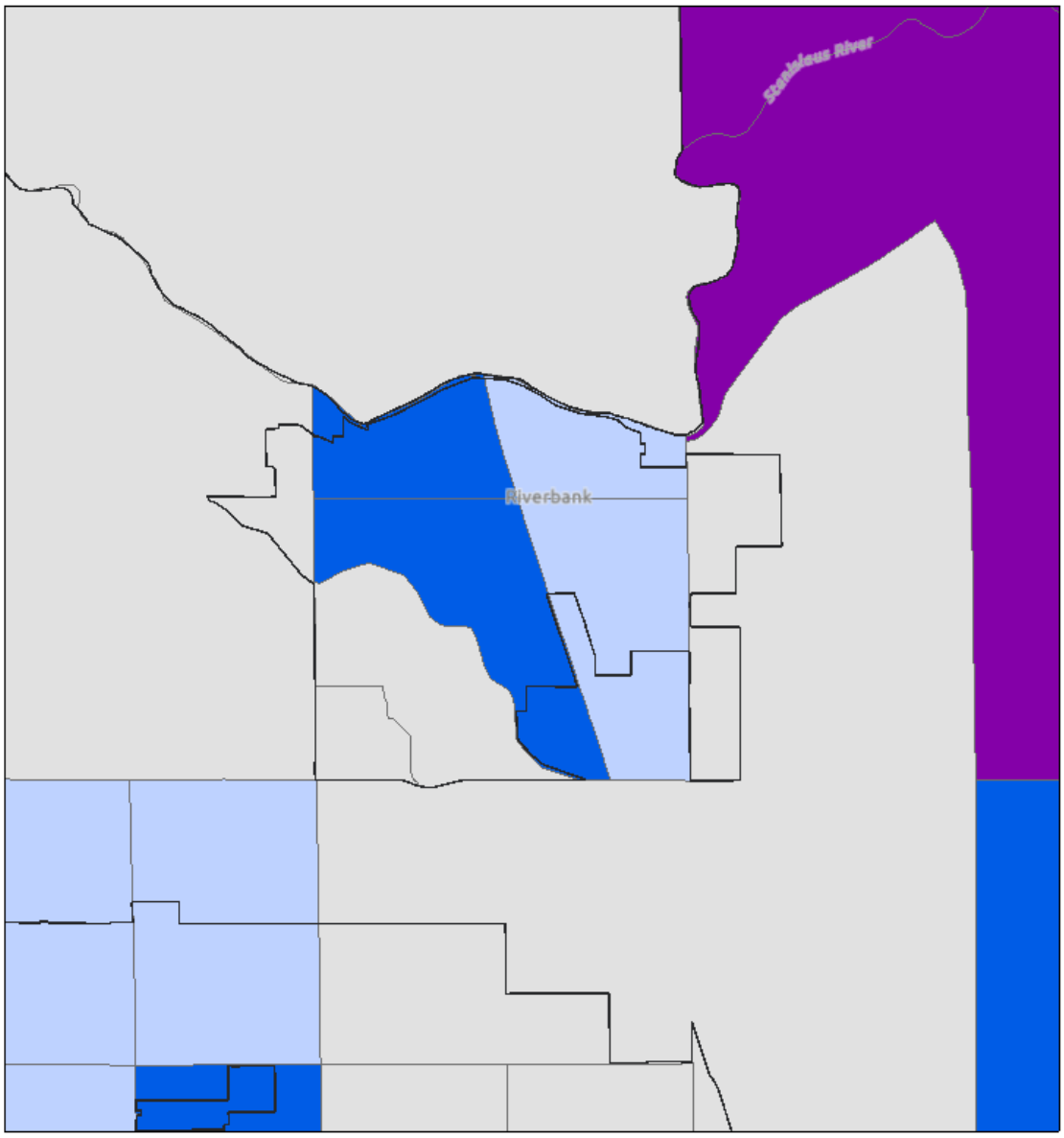


Figure V-3 Neighborhood Segregation (City of Riverbank)



Persons with Disabilities

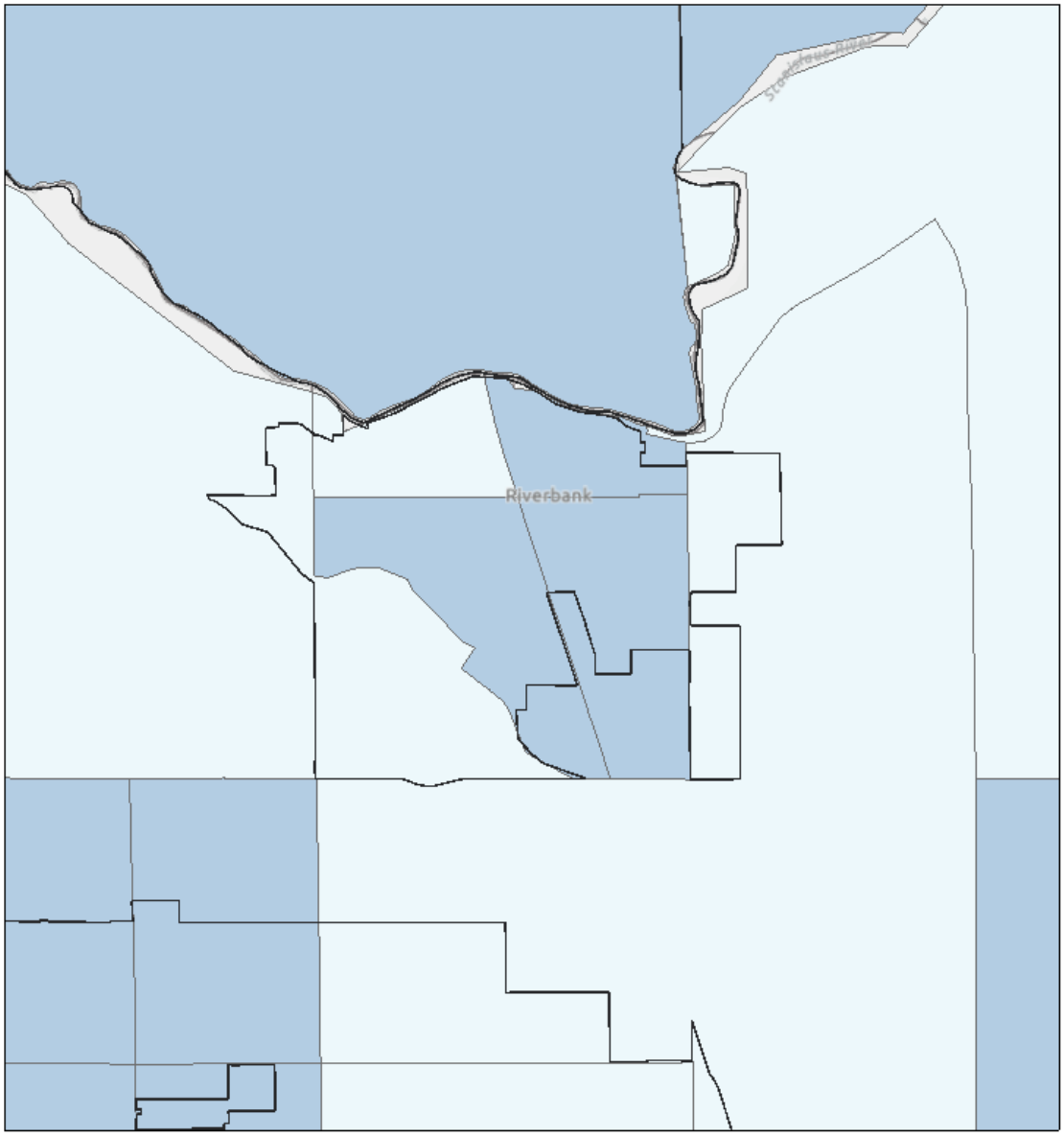
As referenced in Section IV, *Housing Supply and Needs*, approximately 2,300 persons are living with one or more disabilities in the City of Riverbank, which is approximately 9.5 percent of the total population. This is similar to the Northern SJV region, where approximately 13 percent of residents are living with one or more disabilities. The most common disability in the City is ambulatory difficulty, followed by independent living difficulty (Table V-3). Disabilities are most prevalent among senior residents. Approximately 40 percent of residents over the age of 75 are living with a disability.

TABLE V-3
DISABILITY BY TYPE (CITY OF RIVERBANK)
2022

Disability Type	Number	Percentage
With a hearing difficulty	690	2.8%
With a vision difficulty	441	1.8%
With a cognitive difficulty	885	3.9%
With an ambulatory difficulty	1,304	5.7%
With a self-care difficulty	606	2.7%
With an independent living difficulty	959	5.6%
Notes: These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed. *Source: U.S. Census Bureau, ACS 5-Year Data (2018-2022), Table S1810*		

Within Riverbank, between 5 – 10 percent of residents are living with a disability. In most of Stanislaus County, between 10 – 20 percent of the population have a disability. The central part of the County (City of Modesto) has a higher concentration of persons living with a disability than other part of the County (western and eastern portions of the County). There is no evidence of segregation of individuals living with a disability shown in the City (Figure V-4).

Figure V-4 Percent of Population with a Disability (City of Riverbank)



Approximately 4 percent of the total employed population in Riverbank have one or more disabilities, reflecting no change from 2012. An increase the percentage of unemployed population in Riverbank that have one ore more disabilities between 2012 and 2023 (8 percent to 15 percent) although the total of unemployed persons decreased (1,744 to 724). Table V-4 shows the employment status by disability status estimates for Riverbank.

TABLE V-4
EMPLOYMENT STATUS BY DISABILITY STATUS (CITY OF RIVERBANK)
2012 – 2023

Disability Status	Employed 2008 – 2012 (Percent of Total Employed	Unemployed 2008 – 2012 (Percent of Total Unemployed)	Employed 2019 – 2023 (Percent of Total Employed)	Unemployed 2019 – 2023 (Percent of Total Unemployed)
No Disability	8,444 96%	1,597 91%	9,326 96%	618 85%
With a Disability	349 4%	147 8%	437 4%	106 15%
Total	**8,793**	**1,744**	**9,763**	**724**

Source: U.S. Census Bureau of the Census, ACS, Table C18120 Employment Status by Disability Status, 2008 – 2012, 2019 – 2023 Estimates.

Familial Status

Familial status refers to the presence of children under the age of 18 an the marital status of the head of the household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Examples of differential treatment include limiting the number of children in an apartment complex or confining households with children to a specific location. These cations are potentially discriminatory. Single-parent households are protected by fair housing law.

The household composition of total households with children in Riverbank is higher compared to Stanislaus County and the Northern SJV region. However, there is a higher percentage of single parent, female-headed households who rent in Riverbank than Stanislaus County and the NSJV region. Riverbank has a total of 7,266 households in 2023. Households with children present comprise of approximately 43 percent (3,153 households) of the total households (7,266 households) in the City.

This is higher than the region, where 37 percent of households have children present. Married-couple families with children comprise the largest share of households with children (35 percent), which is similar to the observed trends in Stanislaus County (31 percent). Female-headed single-parent households comprise the majority of owner and renter occupied single-parent households (Table V-5).

TABLE V-5
TENURE BY HOUSEHOLD TYPE AND PRESENCE OF CHILDREN (CITY OF RIVERBANK)
2023

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married Couple Family, with Children Present	1,750	35.1%	481	21.1%
Single-Parent, Male Householder, no Spouse Present	67	1.3%	100	4.4%
Single Parent, Female Householder, No Spouse Present	250	5.0%	505	22.1%
Total Households with Children Present	2,067	41.5%	1,086	47.6%
Total Households	**4,983**		**2,283**	

Source: U.S. Census Bureau of the Census, ACS, Table B25115 Tenure by Household Type and Age of Own Children, 2019 – 2023 Estimates

The percentage of children residing in female-headed, single-parent households is greater in the northern portion of the City, where the percentage of children living in a female-headed, single-parent household ranges between 20 – 40 percent (Figure V-5). Elsewhere in Riverbank, less tan 20 percent of children are living in female-headed, single-parent households.

Central Riverbank, west of UPRR and in the Crossroads area have the highest percentage of children in married-couple households, with 80 – 100 percent of children in married-couple households (Figure V-6). Across the rest of the City, between 20 – 60 percent of children live in married-couple households.

Figure V-5 Female-Headed Households with Children Present, No Spouse/Partner Present (City of Riverbank)

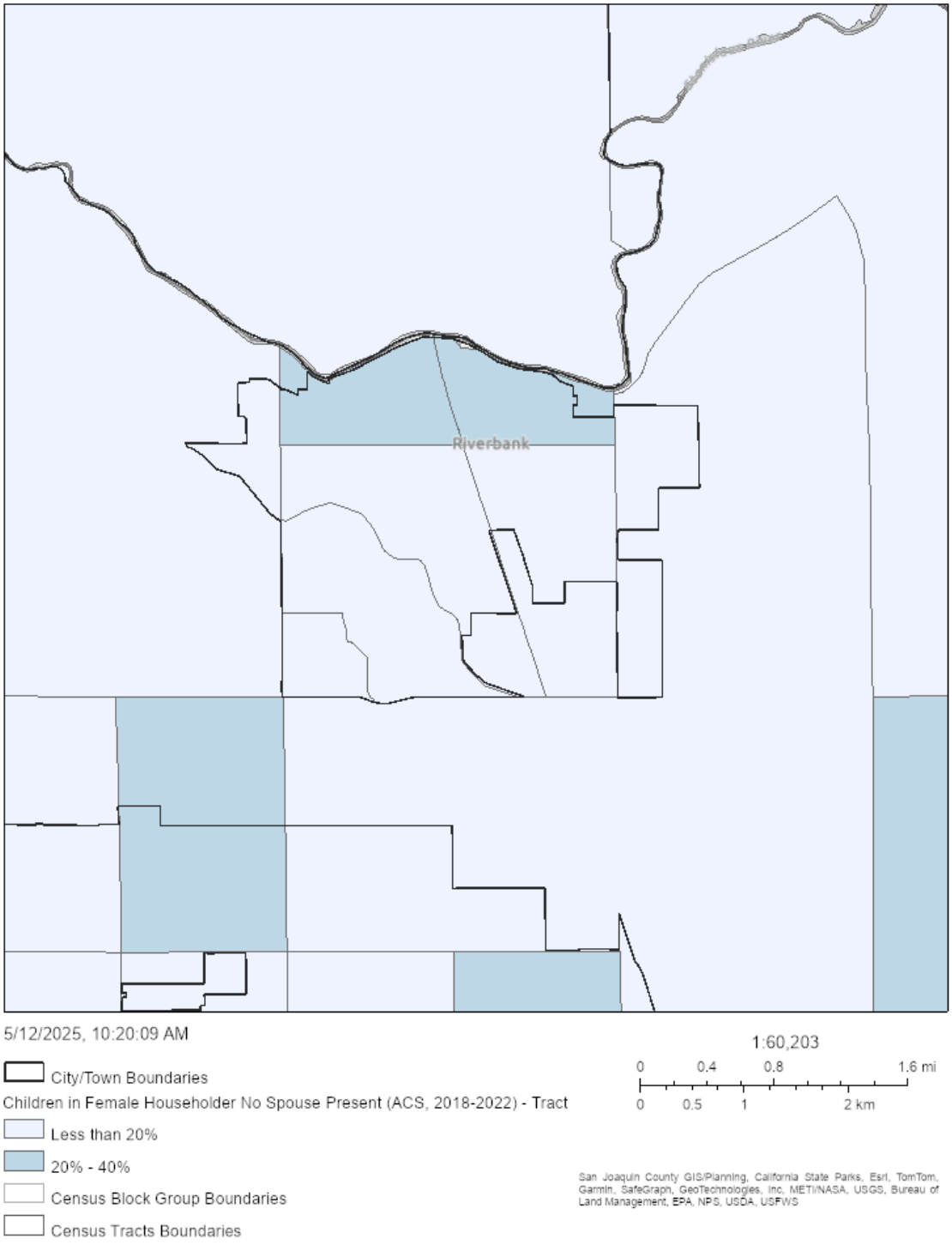
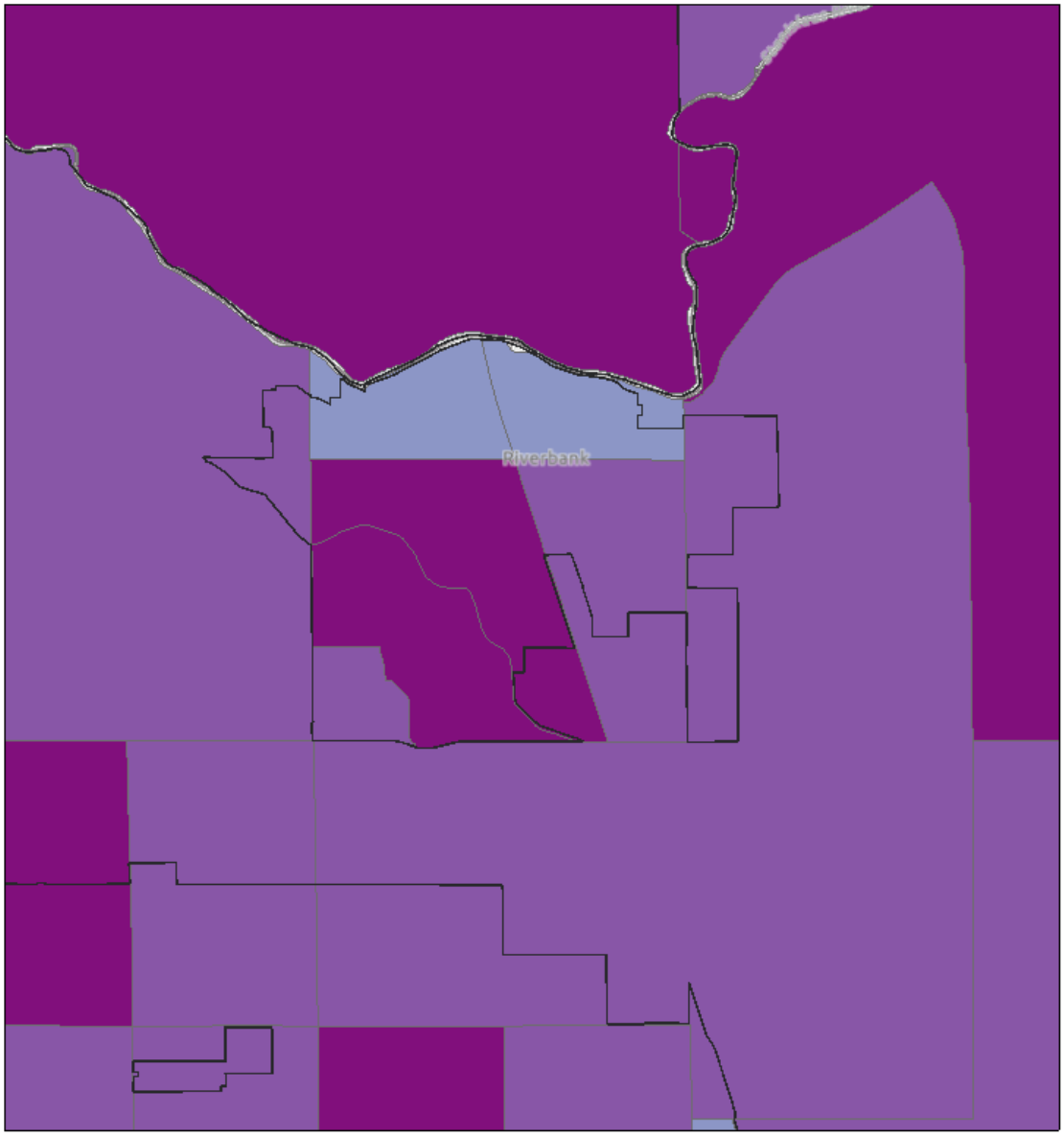


Figure V-6 Children in Married-Couple Households (City of Riverbank)



Household Income

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 the number of persons occupying unsound and overcrowded housing increases. To achieve fair housing objectives, people in low-income households must have a choice in housing opportunities – that is, when they are able to locate units that are affordable and well maintained in all parts of a jurisdiction and region.

This section identifies household income disparities using data based on median household income and low- or moderate-income (LMI) geographies. HUD defines an LMI as a census tract or block group where over 51 percent of the population is LMI. The definition of LMI is based on HUD income definitions of up to 80 percent of the area median income (AMI). Data for this analysis is from the HUD Low and Moderate Income Summary based on the 2016 – 2020 ACS (most recent available data).

As of 2023 (most recent available data), Riverbank has a median household income of $90,216 per year, greater than the county's median household income of $82,758, but lower than the state median household income of $96,334. Median household income across Riverbank falls between $55,000 to $175,000 (Figure V-7). Median household income is higher in the western portion of the City, within the Crossroads neighborhoods (Crossroads and Crossroads West). These areas, particularly the census tract that makes up western portion of the City, overlap with Stanislaus County, which may skew the median income in this area. The residential units in the Crossroads neighborhoods, particularly Crossroads West, are much newer and in better condition than the residential units located in the other portions of the City.

LMI populations are prevalent throughout the County and in Riverbank, especially in the northern and eastern portions of the City of Riverbank (Figure V-8). The northern and eastern portion of the City has the highest percentage of LMI households, with 50 – 75 percent of residents falling into that category. The remaining areas of the City, including the Crossroads neighborhoods have a lower percentage of LMI households, with less than 25% and 25 – 50% percent of residents falling into those categories.

Figure V-7 Median Household Income (City of Riverbank)

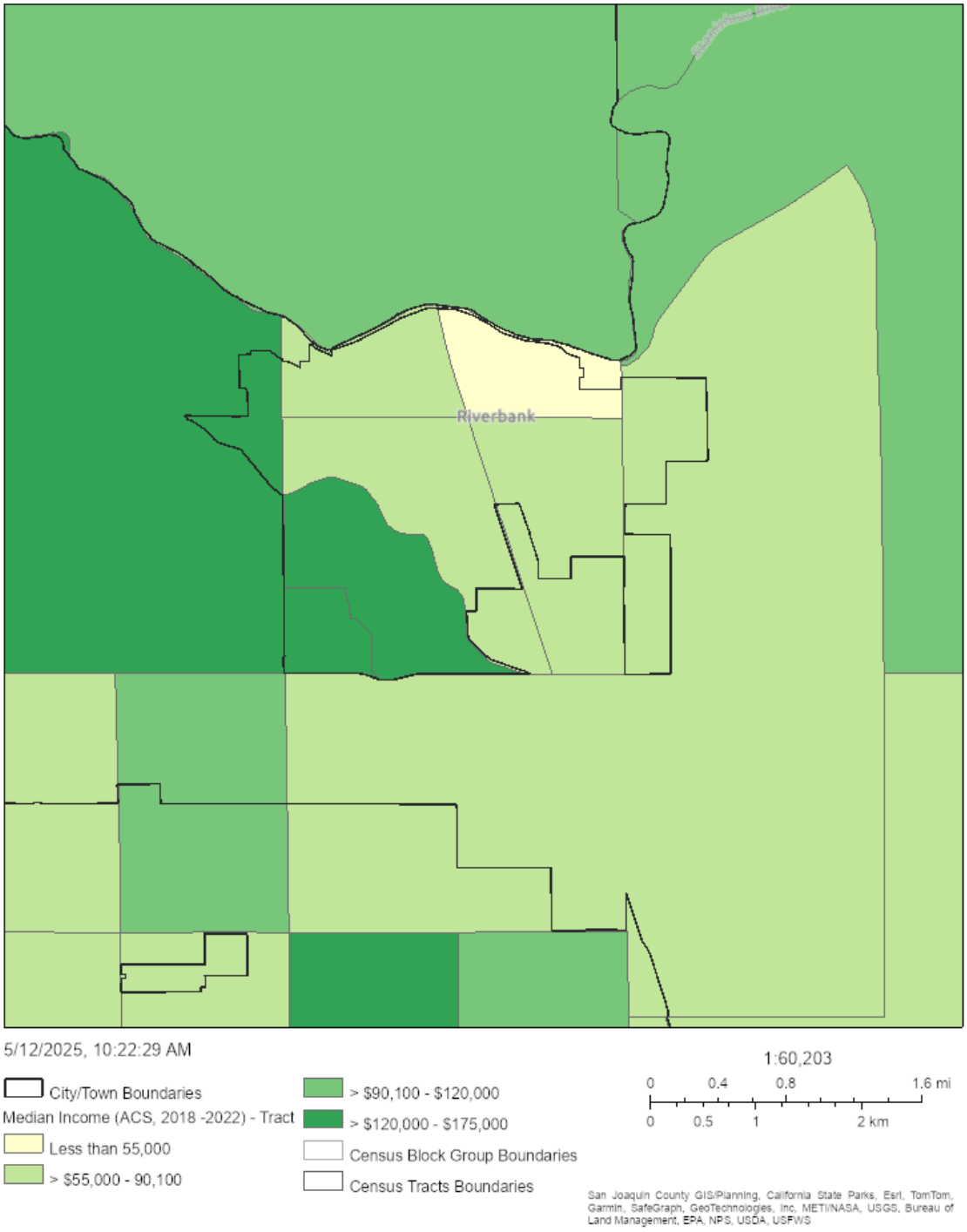
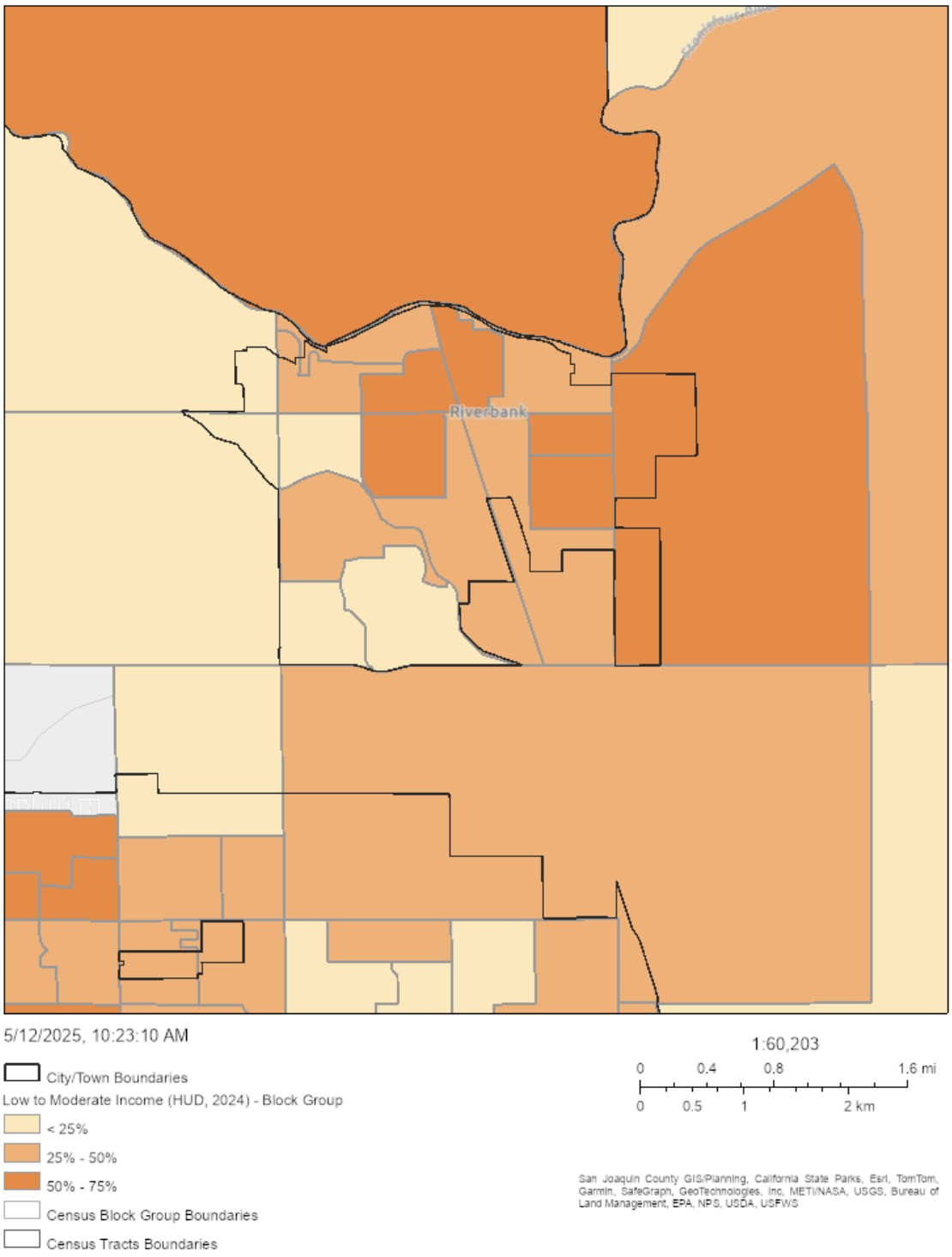


Figure V-8 Low- and Moderate-Income Population (City of Riverbank)



3. Racially and Ethnically Concentrated Areas of Poverty

To identify racially and ethnically concentrated areas of poverty (known as R/ECAPs), the California Tax Credit Allocation Committee (TCAC) includes poverty concentration and racial segregation filter that aligns with HUD's R/ECAP methodology but is intended to reflect the level of racial and ethnic diversity more effectively. TCAC categorizes census tracts that have both a poverty rate of over 30 percent and that are designated as being racially segregated (overrepresentation of people of color relative to the region) as areas of high segregation and poverty.

In Riverbank, there are no designated areas of high segregation and poverty. Areas of high segregation and poverty in the Northern SJV region are found in larger cities. This includes the Cities of Lodi, Stockton, Modesto, Turlock, Merced, and Los Banos.

Poverty and Segregation

The eastern portion of the City have poverty rates that are above 40 percent. Across the City, the poverty rates range from less than 10 percent (Crossroads Neighborhoods), 10 – 20 percent (Central Riverbank), and 20 – 30 percent (northwest Riverbank) (Figure V-9). This is similar to the unincorporated portions of Stanislaus County and adjacent communities such as Oakdale and north Modesto. While the census tracts that encompass eastern Riverbank overlap with unincorporated areas, the majority of residents within these census tracts live within city limits. As a result, it is assumed that the percentage of residents earning below the poverty line within these census tracts accurately reflects the neighborhoods of Riverbank.

Concentrated Areas of Affluence

The AFFH Data Viewer identifies Racially Concentrated Areas of Affluence (RCAA's), defined as white, affluent communities, as census tracts that have a white population that is 1.25 times higher than Stanislaus County and a household median income 1.5 times higher than the AMI. According to the AFFH Data Viewer, the western and southwestern portions of the city are considered RCAAs. Within the region RCAAs are located in the Dutch Hollow Neighborhood of the City of Modesto. No other RCAAs are located within Stanislaus County (Figure V-10).

Figure V-9 Poverty Status (City of Riverbank)

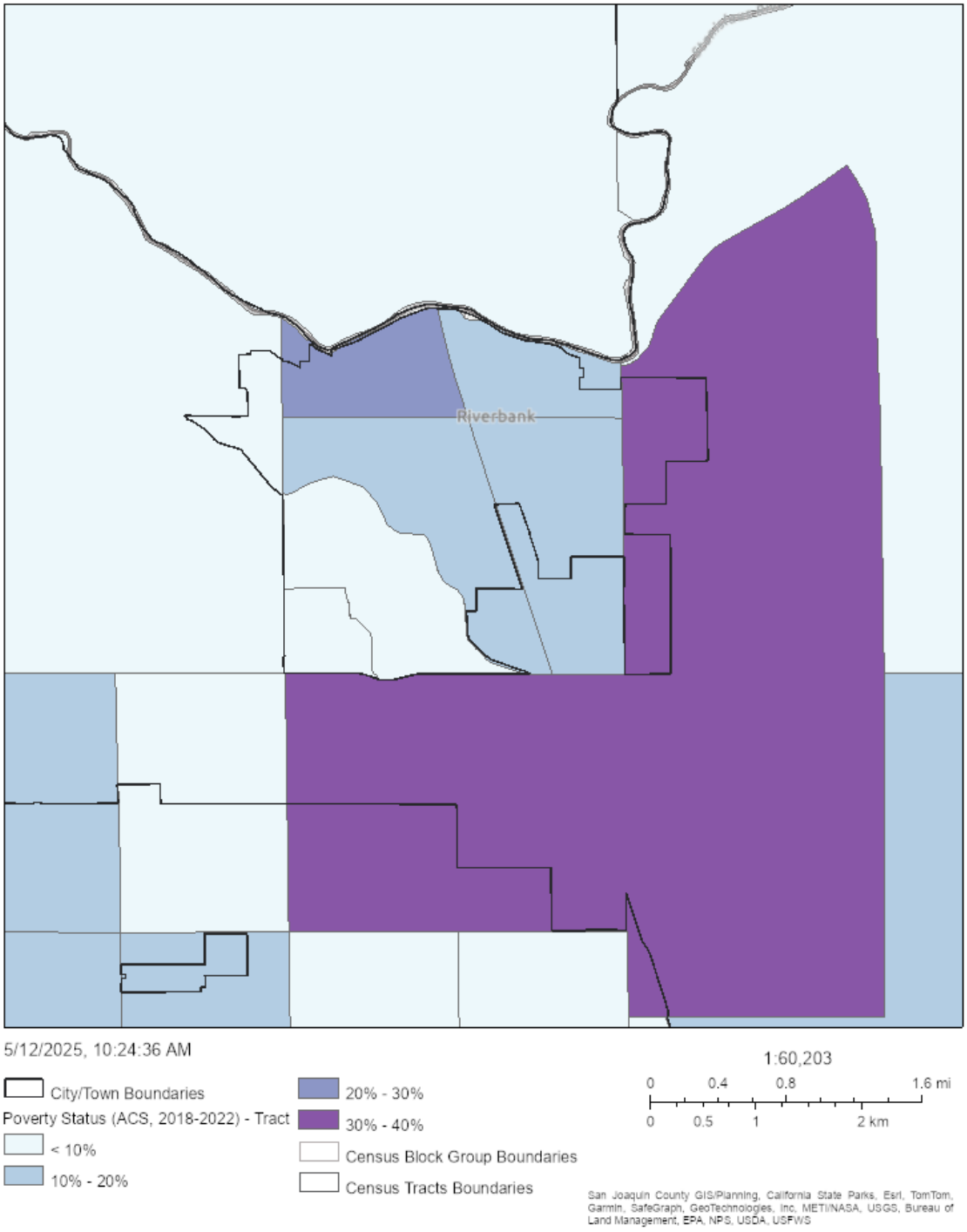
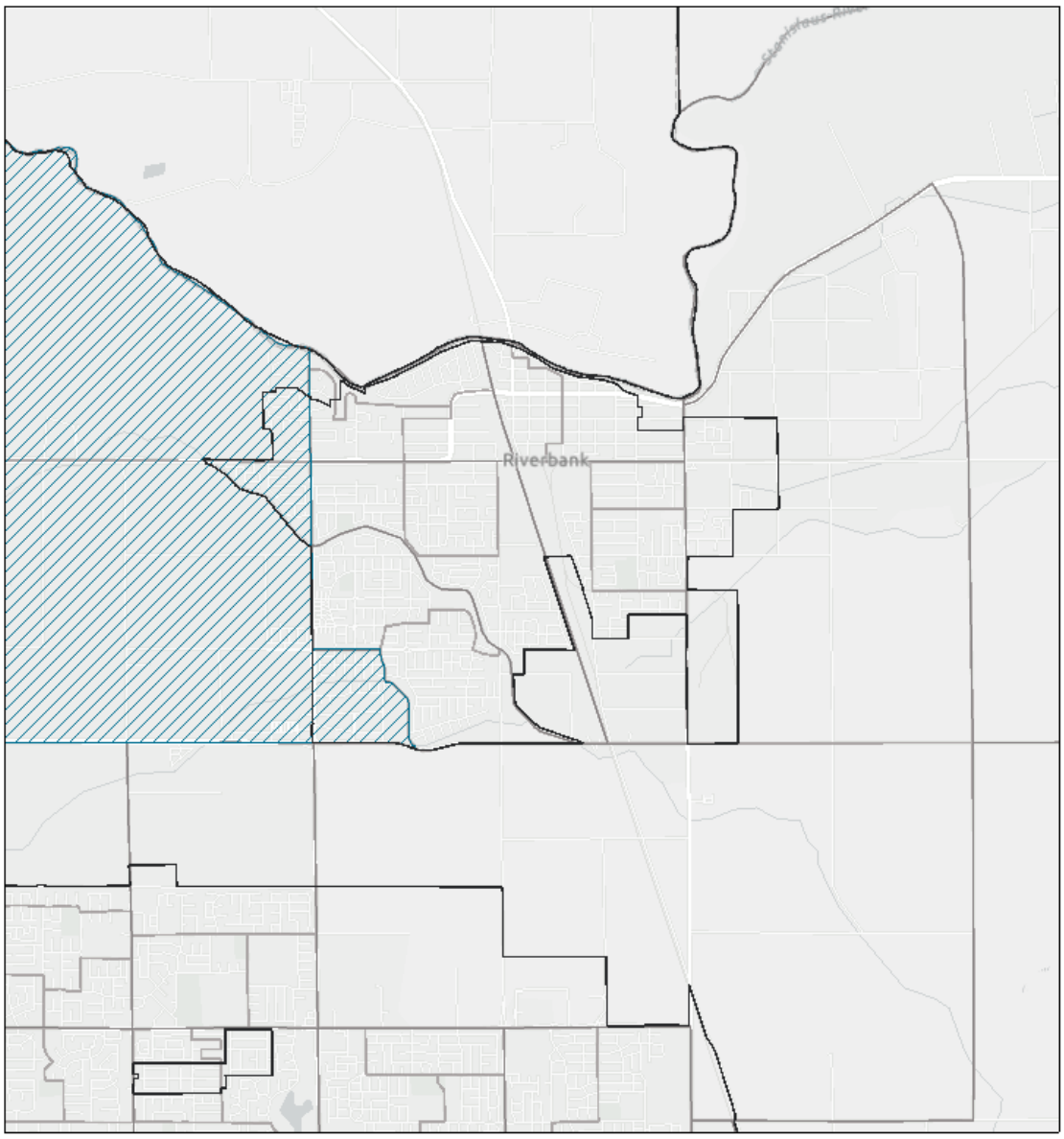


Figure V-10 Concentrated Areas of Affluence (Stanislaus County)



4. Disparities in Access to Opportunities

Transit Access and Walkability

There is limited transit service within Riverbank. "StanRTA" provides fixed route and demand response (ADA Paratransit, Dial-A-Ride and Medivan) services throughout Stanislaus County, as well as commuter service to the Amtrak station in Modesto, ACE station in Lathrop, Manteca Transit Center, Stockton Transit Center, and Dublin/Pleasanton BART Station.

StanRTA offers the following services in Riverbank:

- Route 24 travels between Empire and Riverbank via Yosemite, Creekwood, E. Orangeburg, Roselle, Morill, and Oakdale Road. According to StanRTA, the stops of interest include Johansen High School in Modesto, Riverbank Crossroads Shopping Center, and Enochs High School.
- ADA Paratransit is a complement to fixed-route service providing transit access to individuals with disabilities that prevent them from using the fixed-route bus system. The service is provided 365 days a year within a ¾ mile radius of all fixed routes operated by StanRTA.
- Dial-A-Ride is transportation service that allows passengers to request pick-up and drop-off services by telephone. It's a door-to-door, shared-ride, demand-response service, often used for individuals with disabilities or those who are unable to use the fixed-route bus system. Service in Riverbank is available Monday through Friday between 6:30 AM and 5:30 PM.
- Medivan is a public transit service that takes passengers from the Downtown Modesto Transit Center to Bay Area Medical Centers, Monday through Friday. Although this service is in the City of Modesto, it is available to City of Riverbank residents. This service provides non-emergency medical transportation.

AllTransit is an online database that examines factors related to transit access and produces a performance score that reveals the social and economic impact of transit, such as connectivity and access to jobs. Riverbank received an average AllTransit score of 3.3 which equates to a low combination of trips per week and number of jobs that area accessible enabling few people to take transit to work. This is similar to the majority of the region where slightly more than one percent of commuters use transit.

Walk score is a private company that offers a walkability index on its website which measures the pedestrian friendliness of a given location by analyzing walking routes to nearby amenities and examining population density and road metrics, including block length and intersection density. Riverbank received an overall walk score of 38 out of 100, which is considered a car-dependent city.

Access to Quality Education

Educational outcomes are measured through the education composite score. A neighborhood score for each educational indicator is determined by whether it falls above or below the median (50th percentile) tract or block group within each region. Each indicator falls above the regional median adds 1 point to the final score. The 4 indicators are Math and Reading Proficiency, High School Graduation Rate, and Student Poverty. The score is from 0 to 4, with 4 being the highest score and 0 being the lowest. The majority of Riverbank has a "Highest" composite score (Figure V-11). Regionally, Riverbank has a higher "education composite score" when compared to other Cities in the County, such as Modesto, Turlock and Patterson.

Economic

TCAC measures economic opportunity by census tract. They consider poverty, adult education, employment, job proximity, and median home values. A higher economic index score reflects more positive economic outcomes. Economic outcomes are similar in Riverbank when compared to nearby jurisdictions of Modesto and Oakdale (Figure V-12).

According to 2023 ACS estimates, Riverbank has an employment rate of 62 percent, which is higher than the employment rate in the county (58 percent). The largest industries in Riverbank are educational services, healthcare and social assistance (21.8 percent of employed population); manufacturing (15.3 percent); and public administration (10.1 percent). Educational services, healthcare and social assistance, retail trade, and manufacturing are the highest industries in the county based on employment.

Land zoned for commercial uses are primarily located in central Riverbank, along Patterson Road and in Crossroads West. Land zoned for industrial uses are primarily located within the Riverbank Industrial Complex, an industrial Specific Plan located north of Claribel Road and east of Claus Road.

Figure V-11 TCAC/HCD Opportunity Map – Education (City of Riverbank)

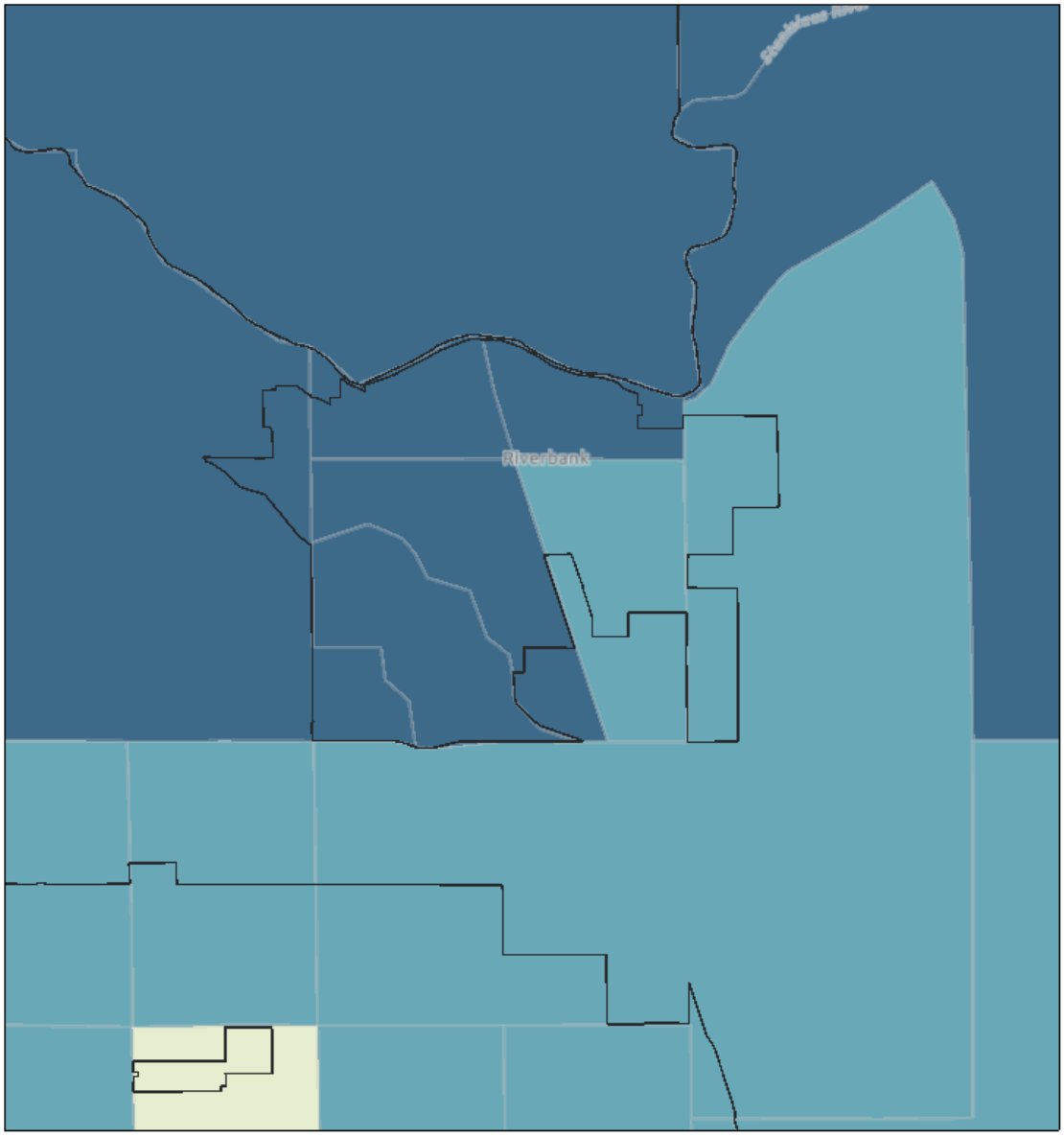
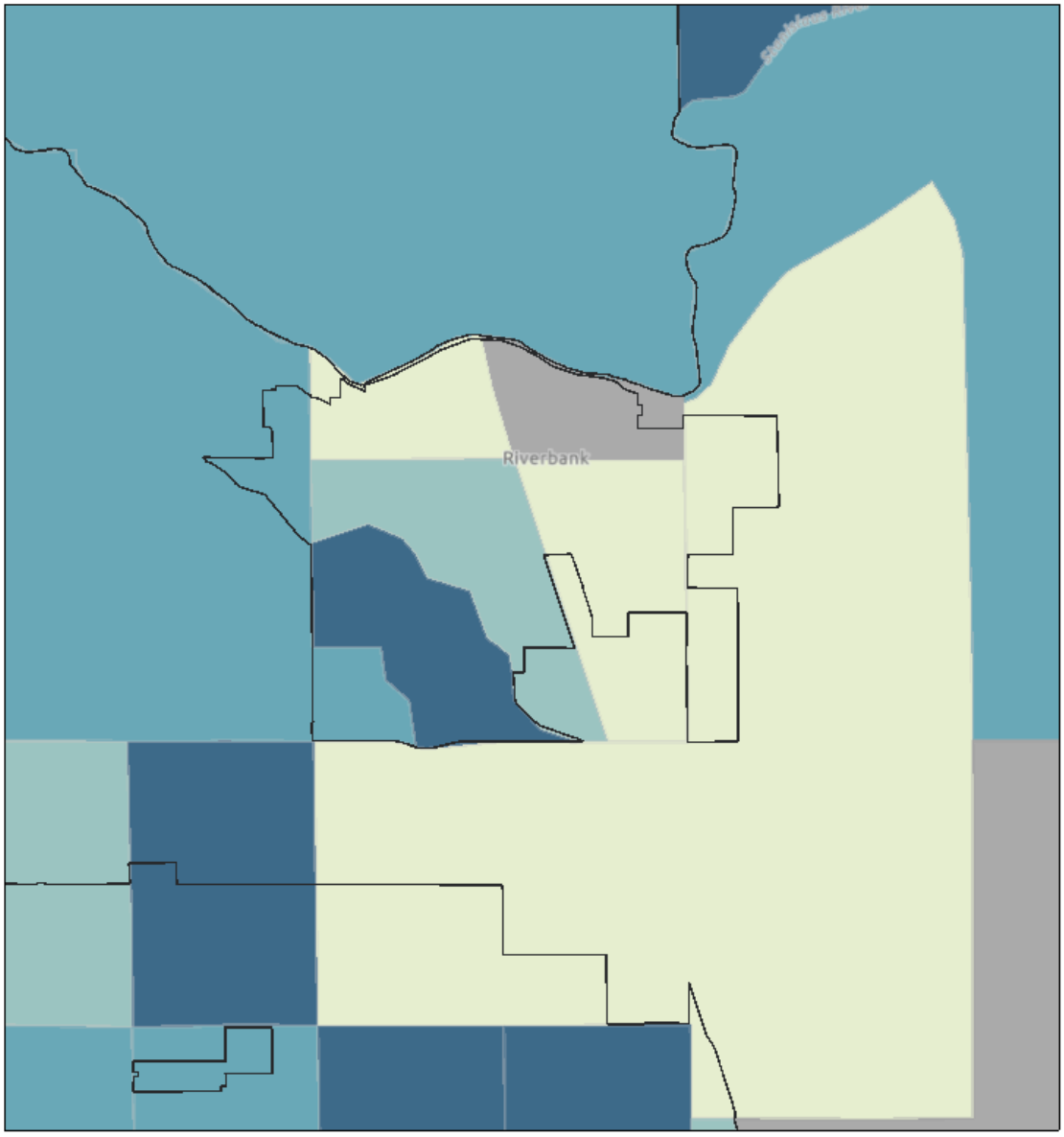


Figure V-12 TCAC/HCD Opportunity Map – Economic (City of Riverbank)



Health and Safe Housing Environment

The CalEnviroScreen map identifies the degree in which communities are considered burdened by pollution. CalEnviroScreen identified higher pollution burden in north and eastern portions of Riverbank, with a percentile score between 80 and 100 (Figure V-13). This is a more negative score than other parts of the City. The CalEnviroScreen in the majority of Riverbank ranges from 40 – 80 and is similar to other parts of the County. Throughout the City, pollution burden caused by ozone pesticides, and drinking water are high.

Senate Bill (SB) 535 tasks the California Environmental Protection Agency with identifying disadvantaged communities. Disadvantaged communities are low-income areas that are disproportionately affected by environmental pollution and other hazards. Under SB 535, a minimum of 25 percent of funds from the Greenhouse Gas Reduction Fund, funded by revenue from the state's cap-and-trade emissions program, goes to projects that benefit disadvantaged communities. The majority of Riverbank is considered a disadvantaged community as illustrated in Figure V-14.

Figure V-13 CalEnviroScreen 4.0 Percentile Scores (City of Riverbank)

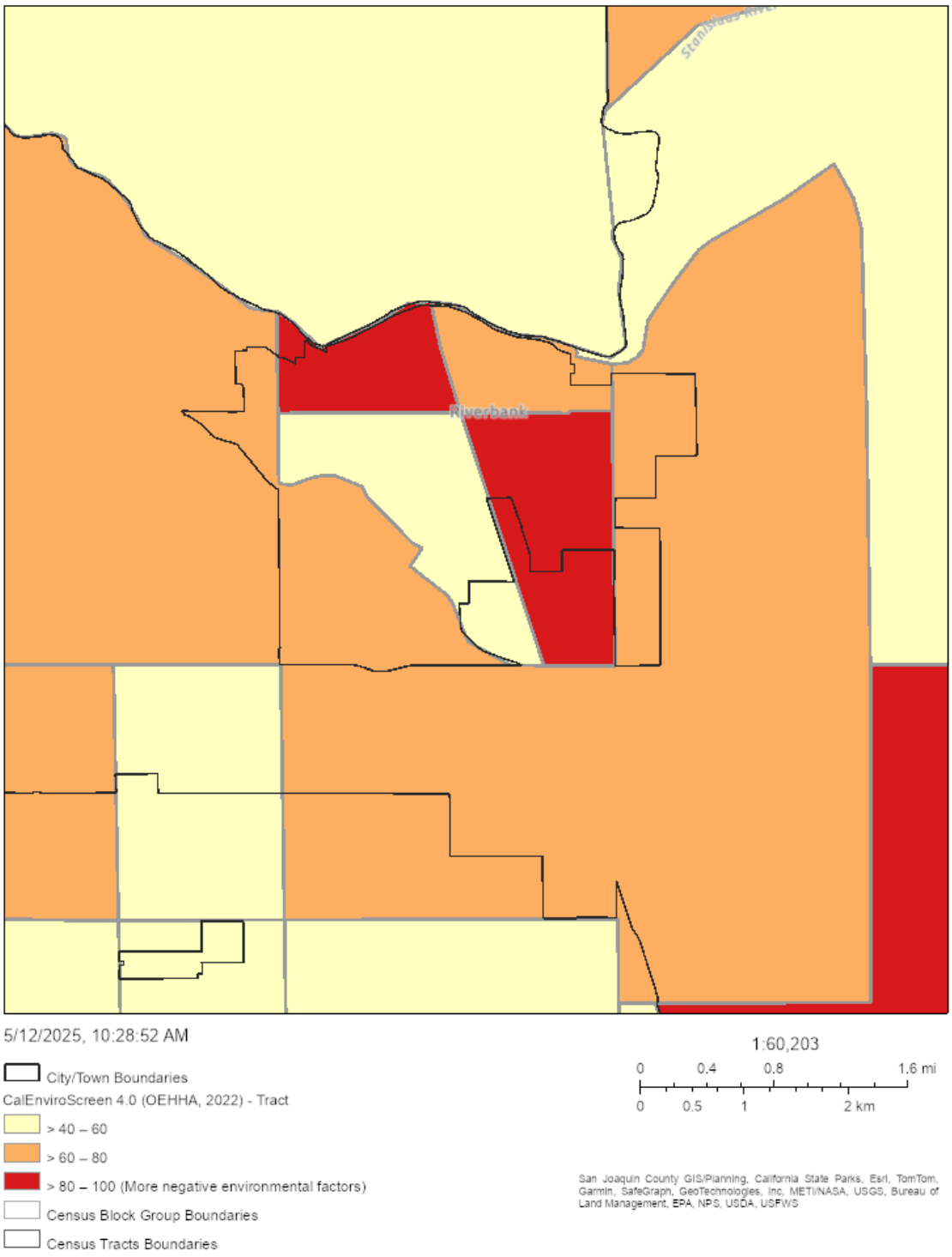
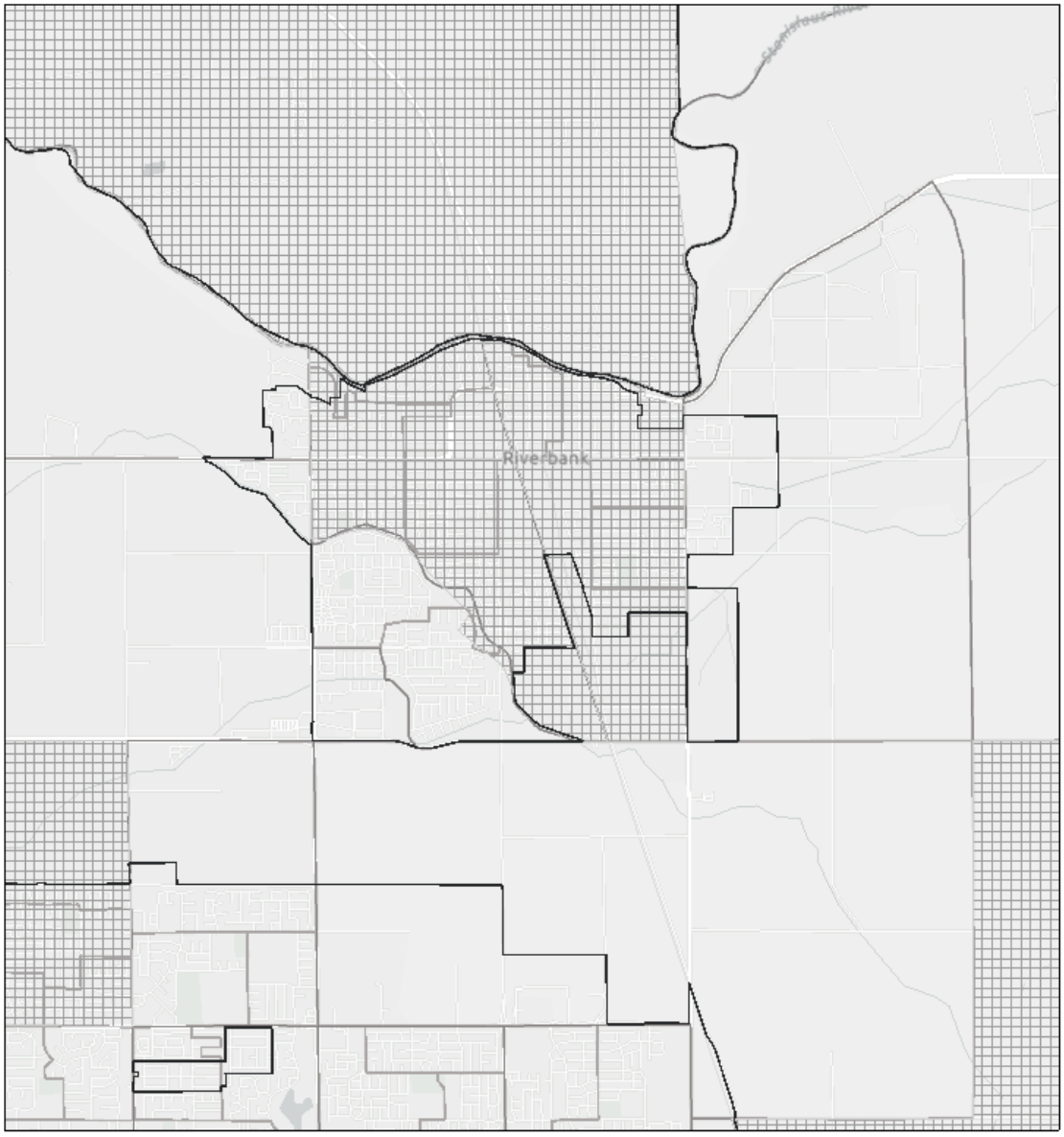


Figure V-14 SB 535 Disadvantaged Communities (City of Riverbank)



5. Disproportionate Housing Needs

Disproportionate housing needs refers to a condition in which there are significant disparities in the proportion of members of protected class experiencing a category of housing need, or a total population experiencing that category of housing need in the applicable geographic area. To analyze the extent of disproportionate housing needs, this section reviews HUD Comprehensive Housing Affordability Strategy (CHAS) data on housing cost burden, overcrowding, and substandard housing conditions (collectively known as "housing problems"), homelessness, and displacement risk.

Housing Problems

According to federal law, "housing problems" refers to any of four housing issues: cost burden and severe cost burden, overcrowding, and substandard housing conditions. Substandard housing is defined as housing lacking complete plumbing or kitchen facilities.

Approximately 34 percent of total households in Riverbank experience housing problems. About 18 percent of total households experience severe housing problems. This is similar to the region, where 40 percent of all household experience housing problems and 23 percent of households experience severe housing problems.

Substandard Housing Conditions

HUD considers housing units to be "standard units" if they comply with local building codes, whereas housing units are considered "substandard" if they lack complete plumbing and kitchen facilities.

Approximately 25 percent of Riverbank's housing stock was constructed prior to 1980 and is more than 40 years old. These units are potentially in need of repair and modernization improvements.

Housing Cost Burden

The rate of cost burden (spending more than 30 percent of household income on cost) is high throughout Riverbank. Cost burden by homeowners in the majority of Riverbank is between 20 and 40 percent of owner-occupied households (Figure V-15). The cost burden among homeowners is higher in the northwestern and eastern part of Riverbank, with 40 – 60 percent of homeowners are overpaying. This is similar to other nearby communities such as Oakdale and, but is lower than the City of Modesto, where trend indicate that 60 – 80 percent of owners are cost burdened south Modesto.

For renter households, the most severe areas of renters that are cost burdened are eastern Riverbank and central Riverbank, where 60 – 80 percent of renters are cost burdened. This is higher than owner-occupied households and similar to other areas of the region (Figure V-16).

Approximately 30 percent of total households in Riverbank are cost burdened and 11 percent of households are severely cost burdened (Table V-6). Both owner- and renter-occupied households experienced cost burden across all income levels. Extremely low-, very low-, and low-income households experienced cost burden at disproportionately high rates compared to moderate and above moderate-income households, both fro renter and owner households. The percentage of household experiencing cost burden generally increases as income level decreases, which represents trends in Riverbank. Approximately 74 percent of all extremely low-income households experienced cost burden, while only 14 percent of moderate and above moderate-income households experienced cost burden.

TABLE V-6
COST BURDEN BY INCOME CATEGORY
2017 – 2021

Household by Tenure, Income, and Housing Problem	Owners		Renters		Total Households	
	Total	Percent	Total	Percent	Total	Percent
Extremely Low-Income (0 – 30% AMI)	**325**	**100.0%**	**490**	**100.0%**	**815**	**100**
With any housing problem	240	73.8%	360	73.5%	600	73.6%
With cost burden >30%	245	75.4%	360	73.5%	605	74.2%
With cost burden >50%	125	38.5%	330	67.3%	505	61.9%
Very low-income (31 – 50% AMI)	**310**	**100.0%**	**335**	**100.0%**	**645**	**100.0%**
With any housing problem	215	69.4%	295	88.0%	510	79.1%
With cost burden >30%	220	70.9%	270	80.6%	490	75.9%
With cost burden >50%	140	45.2%	130	38.8%	270	41.9%
Low-income (51 – 80% AMI)	**705**	**100.0**	**430**	**100.0%**	**1,135**	**100.0%**
With any housing problem	370	52.5%	345	80.2%	715	62.9%
With cost burden >30%	360	51.1%	295	68.6%	650	57.2%
With cost burden >50%	55	7.8%	15	3.5%	70	6.2%
Moderate & Above Income (>80% AMI)	**3,585**	**100.0%**	**1,155**	**100.0%**	**4,740**	**100.0%**
With any housing problem	595	16.6%	95	8.2%	690	14.5%
With cost burden >30%	405	11.3%	44	3.8%	455	9.6%
With cost burden >50%	0	0.0%	10	0.9%	10	0.2%
Total Households	**4,925**	**100.0%**	**2,410**	**100.0%**	**7,335**	**100.00%**
With any housing problem	1,420	28.8%	1,095	45.4%	2,515	34.3%
With cost burden >30%	1,230	24.9%	969	40.2%	2,200	29.9%
With cost burden >50%	320	6.5%	485	20.1%	855	11.7%

Note: Housing problems: There are four housing problems in the CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. A household is said to have a housing problem if they have any 1 of these 4 problems.
Cost burden: Monthly housing costs (including utilities) exceeding 30% monthly income.
Severe cost burden: Monthly housing costs (including utilities) exceeding 50% monthly income.
Source: U.S. Department of Housing and Urban Development (HUD), CHAS ACS Tabulation, 2017-2021

Overcrowding

As shown in Table V-7, Riverbank has 1,737 large households (households with five or more people), comprising approximately 24 percent of total households. This is higher than the county (18 percent) and the Northern SJV region average (19 percent). A higher percentage of renter households (25 percent) are large households compared to owner households (23 percent).

The rate of overcrowding households is higher in central and northern Riverbank compared to the east and west portions of the City (Figure V-17). Overcrowding rates are less than other cities and communities in the County, such as the City of Modesto, which contains areas where over 20 percent of households are overcrowded.

TABLE V-7
LARGE HOUSEHOLDS
2017 – 2021

	Number of Households	Percent of Households
Total Occupied Housing Units	7,266	100.0%
Total Large Households (5 or more Persons)	1,737	23.9%
5-Person Household	957	13.2%
6-Person Household	515	7.1%
7-or-More Person Household	265	3.6%
Source: U.S. Census Bureau, ACS 5-Year Data (2019-2023), Table B25009		

Figure V-15 Overpayment by Homeowners (City of Riverbank)

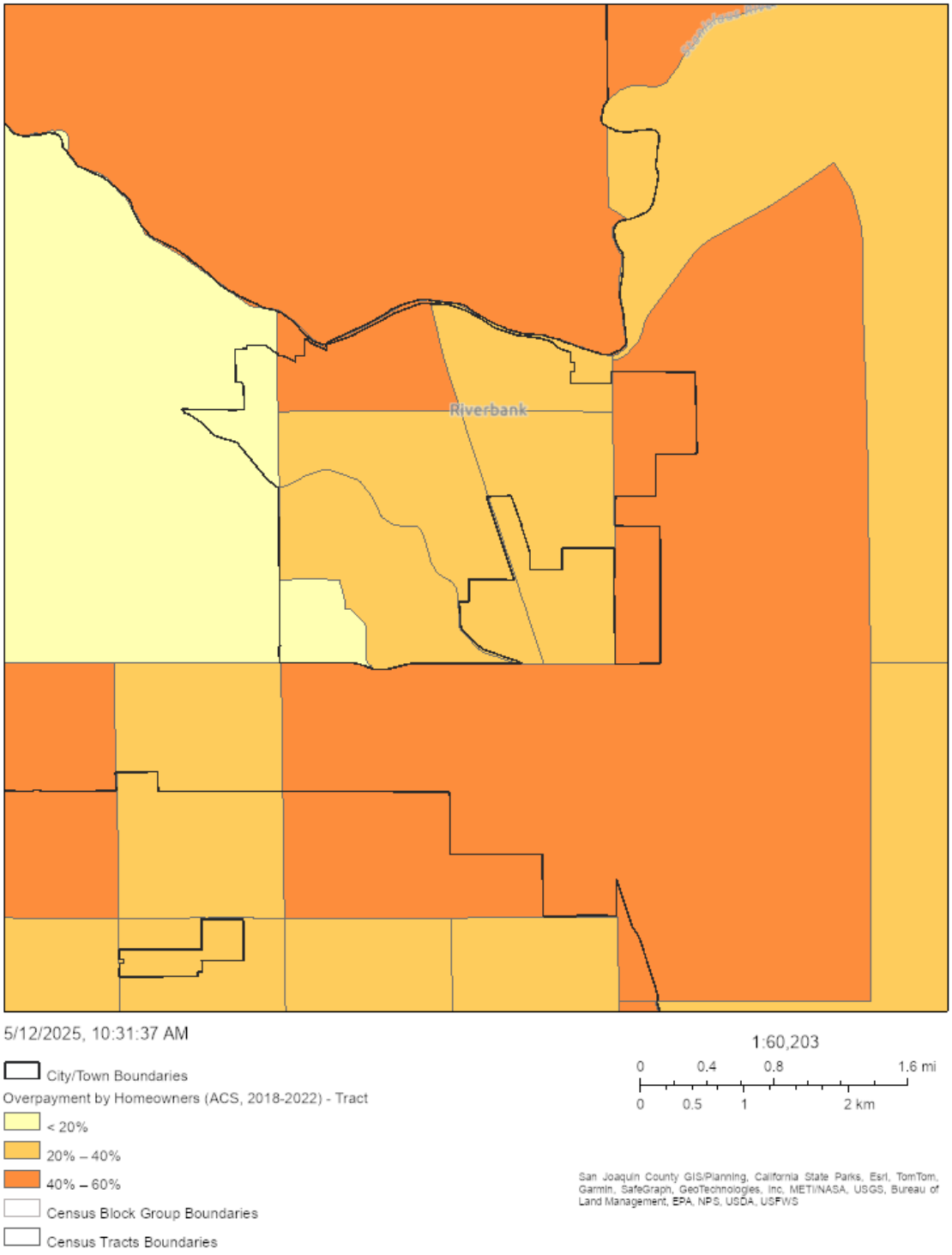


Figure V-16 Overpayment by Renters (City of Riverbank)

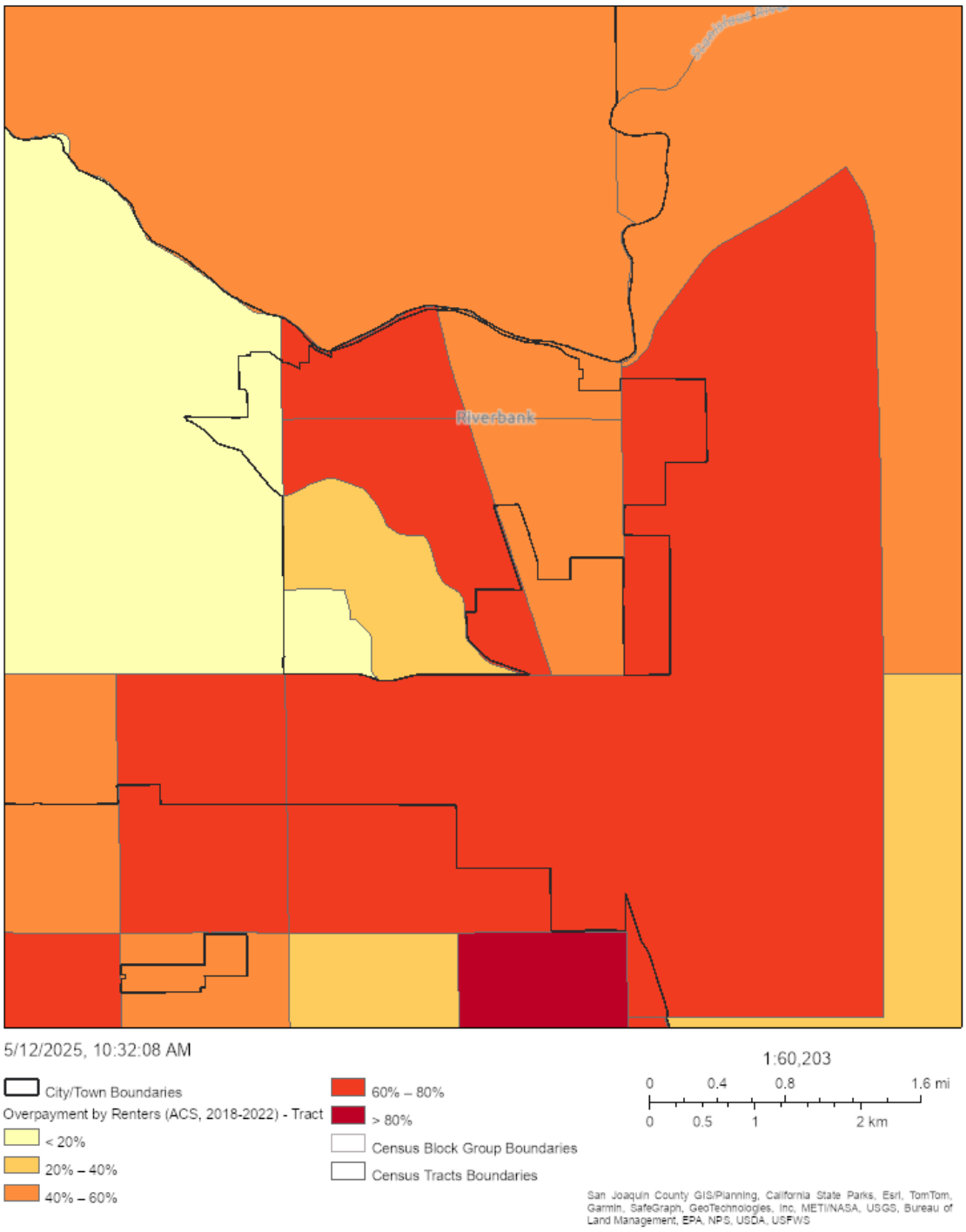
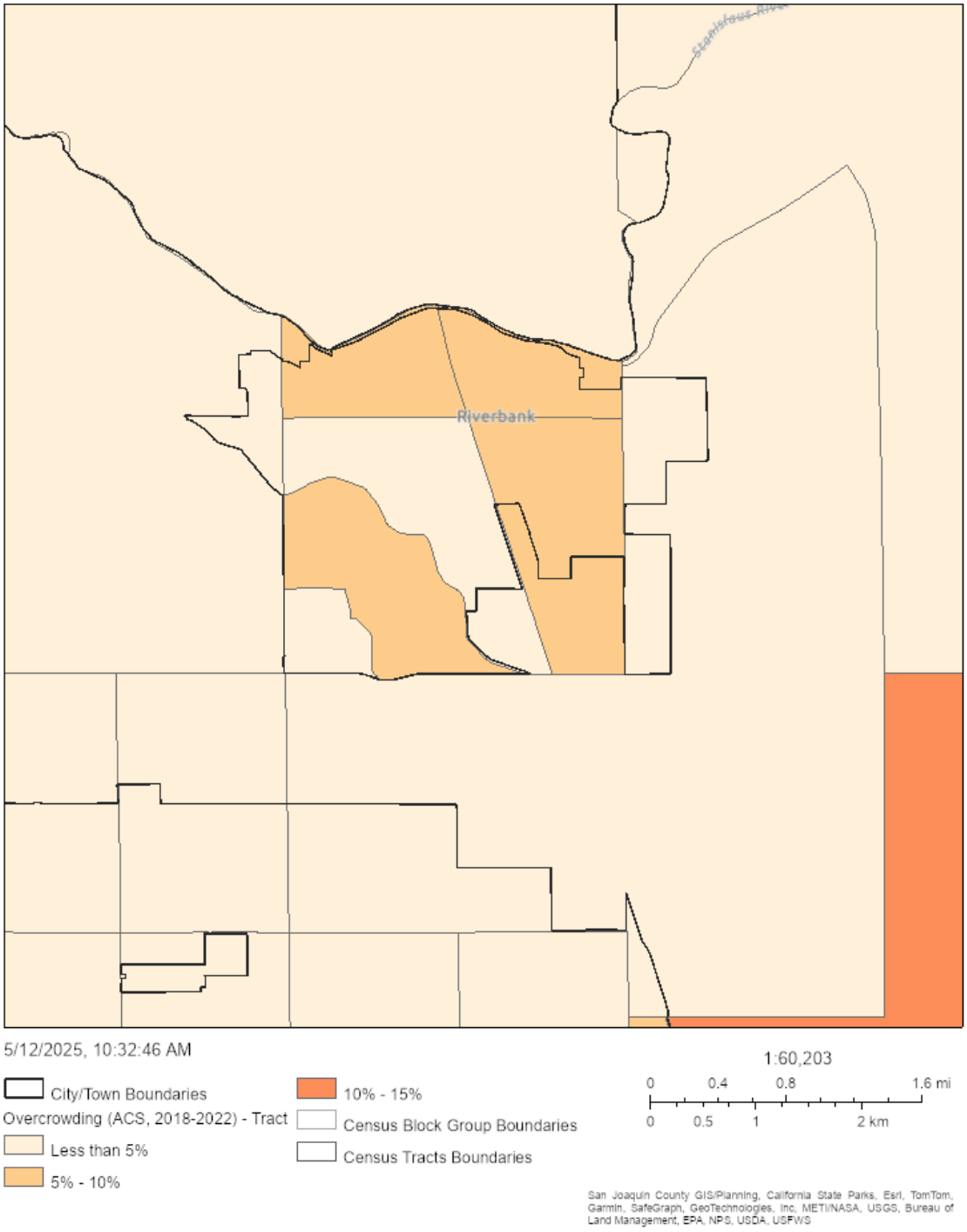


Figure V-17 Overcrowded Households (City of Riverbank)



Homelessness

According to the 2024 Stanislaus County point-in-time (PIT) count 2,052 unhoused persons were recorded in Stanislaus County and its jurisdictions, representing a decrease of 39 persons from 2023. In Riverbank, 28 unsheltered and sheltered people were recorded in 2024, compared to 18 people recorded in 2023. The total population in Riverbank comprises 4 percent of the population in Stanislaus County, and the unhoused population in Riverbank represents 1.4 percent of the total unhoused population recorded in Stanislaus County. Riverbank has a roughly proportional share of the County's unhoused population. The total population in Riverbank comprises approximately 1.4 percent of the population in Stanislaus County. City staff have observed encampments outside the city along the Stanislaus River. Many unhoused individuals in and near Riverbank elect not to accept services that are offered and made available to them. The PIT count does not provide demographic information of the unhoused population for Riverbank.

There are no emergency shelters in Riverbank. However, within the Stanislaus County area, there are 14 available emergency shelters, as shown in Table V-8. Out of the emergency shelters in the County approximately 93 percent of them have occupied beds.

TABLE V-8
EMERGENCY SHELTERS IN STANISLAUS COUNTY
2025

Project Name	Organization Name	Address	Total Beds
CHSS Empire Camp ES	Community Housing and Shelters Services – CHSS	6132 South Ave. Empire, CA 95319	73
Access Center Emergency Shelter	Salvation Army	330 9th Street Modesto, CA 95351	180
The Salvation Army Haig & Isabel Berberian Shelter & Transitional Living Center	Salvation Army	320 9th Street Modesto, CA 95351	182
Marsha's House	Children's Crisis Center	2321 E Whitmore Ave. Ceres, CA 95354	8

CHSS Emergency Shelter	Community Housing and Shelter Services – CHSS	708 H St. Ste B Modesto, CA 95354	82
The Mission	Modesto Gospel Mission	1400 Yosemite Blvd. Modesto, CA 95354	225
Hutton House	Center for Human Services – CHSS	2008 W. Briggsmore Ave. Modesto, CA 95350	7
TGP Women Shelter	Turlock Gospel Mission	432 S. Broadway Turlock, CA 95380	22
Family Promise Interfaith Hospitality Network	Family Promise	2301 Woodland Ave. #8 Modesto, CA 95358	14
REST House	Stanislaus County Affordable Housing Corporation – STANCO	512 Vine St. Modesto, CA 95351	11
HOST	Helping Others Sleep Tonight – HOST	405 S. 4th Street Patterson, CA 95363	25
Hutton House	Youth Navigation Center of Stanislaus County	2004 W. Briggsmore Ave. Modesto, CA 95350	24
Garden Gate Respite	Turning Point	605 5th Street Modesto, CA 95351	11
We Care Shelter	We Care Program	219 S. Broadway Turlock, CA 95380	49
Verda's House	Children's Crisis Center	715 E. Main St. Turlock, CA 95380	7
Source: Point-In-Time Count – Emergency Shelter Housing, HUD 2020 CoC Housing Inventory Count			

In comparing the number of available beds in Stanislaus County to other counties in the region, Stanislaus lies in the middle and is the only county that provides a seasonal emergency shelter. Regionally there are a total of 36 emergency shelters, with 17 in San Joaquin County, 14 in Stanislaus, and 5 in Merced County. In Merced County, there are 454 year-round emergency, safe haven, and transitional housing beds and 193 permanent housing beds, most of which are located in the City of Merced.

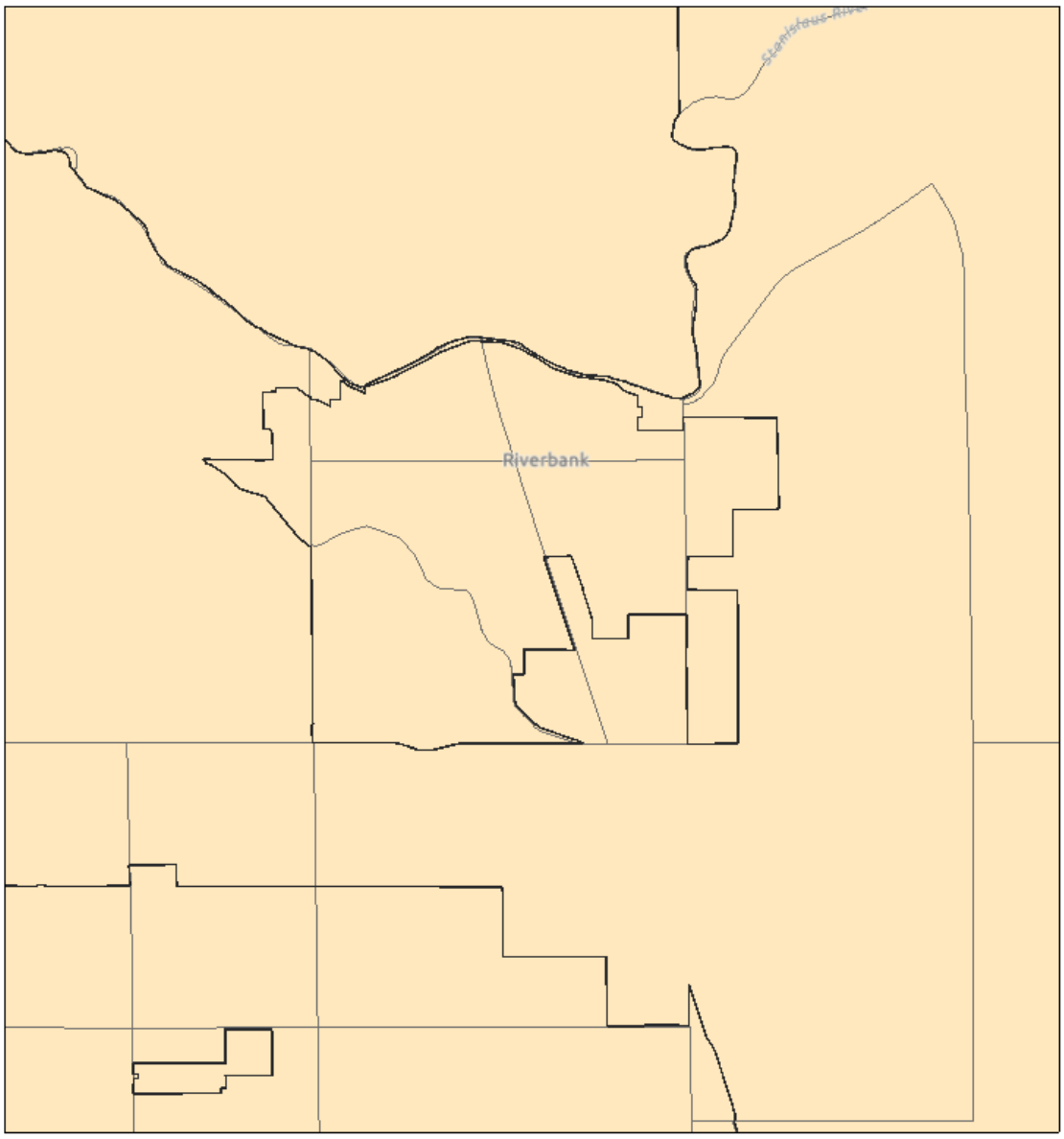
Displacement

The Urban Displacement Project (UDP) designates communities at risk of displacement if the share of very low-income residents is greater than 20 percent and have any of the 2 following characteristics:

- The share of renters is 40 percent
- The share of people of color is above 50 percent
- The share of very low-income households that are severely rent burdened is above the county median
- The percent change in rent is above the county median for rent increases

According to the UDP, Riverbank is considered to have a low risk of displacement (Figure V-18). However, home values and rents have increased significantly in Riverbank over the past decade. According to ACS estimates, between 2018 and 2023, average home value increased from $276,000 to $451,000 and median rent increased from $1,129 to $1,527. In addition, about 30 percent of all households are cost burdened, meaning many households are paying too much for housing. While the UDP rates the risk of displacement as low across Riverbank, these trends indicate cost burdened and low-income households may be at risk of displacement if the cost of housing continues to rise.

Figure V-18 Displacement Risk (City of Riverbank)



6. Local Area Knowledge

Riverbank lies within the northern portion of the ethnographic territory of the Yokuts people. The Yokuts were members of the Penutian language family which held all of the Central Valley, San Francisco Bay Area, and the Pacific Coast from Marin County to near Point Sur. The Yokuts differed from other ethnographic groups in California as they had true tribal divisions with group names. Each tribe spoke a particular dialect, common to its members, but similar enough to other Yokuts that they were mutually intelligible.

The Yokuts held portions of the San Joaquin Valley from the Tehachapis in the south to Stockton in the north. On the north, they were bordered by the Plains Miwok, and on the west by the Saclan or Bay Miwok and Costonoan peoples. Although neighbors wer often from distinct language families, differences between the people appear to have been more influenced by environmental factors as opposed to linguistic affinities. Thus, the Plains Miwok were more similar to the nearby Yokuts than to foothill members of their own language group. Similarities in cultural inventory co-varied with distance from other groups and proximity to culturally diverse people. The material culture of the southern San Joaquin Yokuts was therefore more closely related to that of their non-Yokuts neighbors than to that of Delta members of their own language group.

In 1867, Major James Burney constructed a ferry at the point where the steel bridge crosses the Stanislaus River. The ferry was operated by a number of different individuals and eventually became operated by the County. As early as 1889, citizens had asked for a bridge crossing the river to replace the ferry. After a series of serious accidents, the ferry was closed in 1919. In 1928, a steel bridge was finally completed across the river. The bridge had been built too low, and was threatened several times by floods. It also could not carry heavier trucks. The two counties eventually agreed to the construction of a new bridge, completed in 1967.

Around the original ferry, a small settlement grew up and became known as Burneyville. The town of Burwood, two miles north served as the post office for the community. The first building to be built was a warehouse, and in the early 1870s the town contained several residences, a grocery store, blacksmith, two or three saloons, a dry goods store and a shoe shop.

Riverbank, always a distinct community from Burneyville, began as a flag-stop depot on the San Francisco and San Joaquin Valley Railroad. The company began surveys and construction on the route south from Stockton in 1891 and 1892.

By 1896, the route had been completed as far south as Fresno. The railroad was sold in 1898 to the Atchinson, Topeka and Santa Fe Railroad (now the Burlington Northern Santa Fe). Because Burneyville was below the bluff and the bridge and trestle, the company only maintained a depot about a half-mile to the south of the river. This flag-stop was selected by the railroad for the location of a roundhouse and repair shops, and led to the development and naming of Riverbank.

Stakeholder and Community Input

A community workshop was held in Riverbank on July 31, 2024. During the workshop, participants expressed housing costs and rent affordability as one of the biggest housing challenges in Riverbank, as well as difficulty finding the type of housing needed, and difficulty buying a home. During the workshop, participants were able to write down the biggest housing needs and constraints. Written housing needs and constraints included but are not limited to increasing the variety of housing types, increase vertical building limits, the need for senior housing and multi-generational housing, concern related to sewer and water capacity, and to review options for inclusionary housing policies.

The City also conducted a stakeholder interview meeting on September 11, 2024, and invited service providers, community organizations, and affordable and market rate housing developers to participate. Self-Help Enterprises, an affordable housing developer, provided written comments on the Housing Element and request to participate in the stakeholder interview meeting. Self-Help Enterprises outlined general comments including AFFH and to include high or highest resource sites in the Housing Element, documenting surplus sites, creating an efficient entitlement process, the need for suitable sites for affordable housing, adding a program to promote manufactured housing development, and promoting fee waivers and/or deferrals.

7. Other Relevant Factors

Other factors to fair housing in Riverbank that have not been previously discussed in this analysis include language barriers, lack of emergency shelters and lack of farmworker housing. These contributing factors limit the accumulation of wealth and access to housing resources in historically marginalized communities.

Limited English Proficiency

Language barriers can lead to linguistic and cultural isolation. According to the 2019 – 2023 ACS (Table S1601), 49.8 percent of Riverbank residents speak a language other than English at home, and the majority of these speak Spanish.

Farmworker Housing

Much of the land surrounding Riverbank is utilized for agricultural operations and approximately 5.2 percent of Riverbank's population (536 persons) works in agriculture, forestry, fishing, hunting, and mining. Riverbank is near Oakdale and Escalon which contain extensive agricultural operations. Farmworkers employed by nearby agricultural businesses may seek housing in Riverbank. However, the migratory and often seasonal nature of farm work often makes it difficult for farmworkers in Riverbank.

Housing Stock Type

The vast majority of the housing stock in Riverbank (84 percent) is made up of detached single-family homes, which may not be affordable for lower-income households. Thirty-five percent of all housing units contain four or more bedrooms which can accommodate large families without overcrowding.

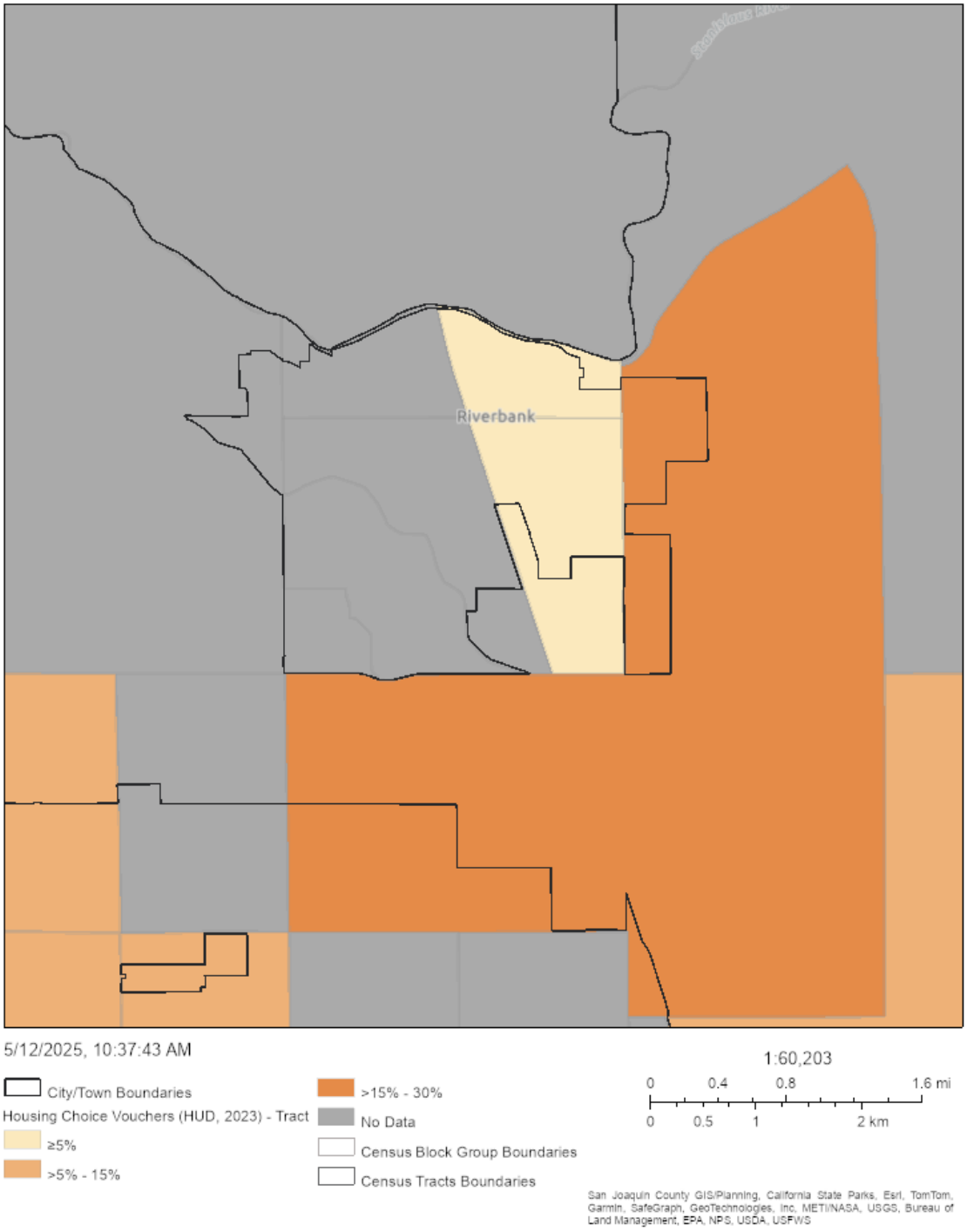
The City of Riverbank has 1,737 large households, approximately 24 percent of total households. A higher percentage of renter households (25 percent) are considered large households compared to owner households (23 percent).

8. Subsidized Housing

According to the California Housing Partnership, there are 5 affordable housing developments in Riverbank totaling 219 units. These buildings are scattered throughout the City, with the majority located within the northern portion of the City.

The Riverbank Housing Authority which is independently administered by the Stanislaus County Housing Authority administers housing choice vouchers (HCVs) in the City of Riverbank. According to the AFFH Data Viewer, there are more households located in eastern Riverbank that received HCVs than Central or Western Riverbank.

Figure V-19 Housing Choice Vouchers (City of Riverbank)



9. Site Inventory Analysis

This portion of the AFFH analyzes the relation between the housing opportunity sites and AFFH-related issues. Government Code Section 65583(c)(10) requires the housing opportunity sites to be analyzed with respect to AFFH to ensure that sites designated for low-income households are dispersed equitably throughout the city rather than concentrated in areas of high segregation and poverty or low-resource areas that have historically been undeserved, and conversely, that sites designated for above moderate-income households are not concentrated in high-resource areas. By whether the opportunity sites improve or exacerbate fair housing conditions, patterns of segregation, and access to opportunity.

Housing Sites by TCAC Opportunity Area

For purposes of evaluating fair housing, resource levels designated by TCAC/HCD denote access to economic and educational opportunities such as low-cost transportation, jobs, and high-quality schools and the quality of environmental factors in the area such as proximity to hazards and air quality. TCAC has composite opportunity score for each census tract. The City has three (3) opportunity composite scores, Highest Resource (Crossroads and Crossroads West neighborhoods), High Resource (Central Riverbank west of UPRR), and Moderate Resource (Central Riverbank east of UPRR and east Riverbank).

The City's Site Inventory can accommodate 3,726 housing units on 193 sites, including proposed rezone sites. Table V-9 shows the number of proposed housing units by income level in each resource area.

TABLE V-9
PROPOSED HOUSING UNITS BY RESOURCE AREA
CITY OF RIVERBANK
2025

Income Level	Very Low-Income	Low-Income	Moderate-Income	Above-Moderate Income	Total Units
Low-Resource Areas	0 units (0% of very low-income units)	0 units (0% of low-income units)	0 units (0% of moderate-income units)	0 units (0% of above moderate-income units)	0 units (0% of total units)
Moderate-Resource Areas	153 units (16% of very low-income units)	103 units (16% of low-income units)	27 units (5% of moderate-income units)	62 (5% of above-moderate income units)	354 units (10% of total units)
High Resource Areas	306 (31% of very low-income units)	204 (31% of low-income units)	19 (3% of moderate-income units)	31 (2% of above-moderate income units)	560 (15% of total units)
Highest Resource Areas	521 (53% of very low-income units)	347 (53% of low-income units)	521 (91% of moderate-income units)	1,226 (92% of above-moderate income units)	2,615 units (75% of total units)
Source: HCD AFFA Data Viewer, TCAC/HCD Opportunity Map, 2025, City of Riverbank					

As shown above in Table V-9, the sites inventory, including sites identified for rezoning, are located primarily in High and Highest Resource areas. Therefore, overall development during the planning period will not contribute to patterns of segregation based on resource designation. On the contrary, the City's Site Inventory will accommodate lower- and moderate-income housing in areas designated high and highest resource, which will increase the mix of housing at all income levels.

Sites by Income Population

The percentage of LMI households varies throughout Riverbank, as shown in Figure V-8. A portion of Central Riverbank and Eastern Riverbank have the highest percentage of LMI households (50 – 75%) in the City and South and Western Riverbank has the lowest percent of LMI households (less than 25%). Seventy-one percent (71%) of sites are located in areas of the City that have the lowest percentage of LMI households (less than 25%).

Sites by Overcrowded Households

Central Riverbank and Eastern Riverbank have lower rates of overcrowding (less than five percent), while North Riverbank, Central Riverbank east of BNSF, and a portion of the Crossroads neighborhood has higher rates of overcrowding (5 to 10 percent), as shown in Figure V-17. The Site Inventory assumes that areas of Riverbank with higher levels of overcrowding could accommodate 1,034 units, including 947 units appropriate for lower-income households and 28 units for above moderate-income households.

The Site Inventory will not exacerbate overcrowding conditions but will add new housing opportunities in areas that would benefit from the development of housing appropriate for a mix of income levels.

Sites by Overpayment by Homeowners and Renters

The percentage of overpayment among homeowners ranges from less than 20 percent a portion of the Crossroads neighborhood and Crossroads West neighborhood, 20 to 40 percent in western, central and eastern Riverbank and 40 to 60 percent in the northwestern portion of the City. For renters, the western portion of the City, north of the Crossroads neighborhood and the eastern portion of the City have the highest percentage (60 to 80 percent) of renter households for whom the gross rent is 30 percent or more of household income. The mixture of very low-, low-, moderate-, and above moderate-income housing units throughout the City will provide affordable housing options for existing lower-income residents as well as encourage higher-income households to move to the area. The Sites Inventory will not exacerbate overpayment by homeowners or renters but will add new housing options in areas that will need them.

Sites by Communities Vulnerable to Displacement

The City of Riverbank is considered to have a lower displacement risk, as shown in Figure V-18. The mixture of very low-, low-, moderate, and above moderate-income housing units throughout the City will provide affordable housing options for existing lower-income residents as well as encourage higher-income households to move into the area. The Sites Inventory will not exacerbate displacement risk in the City.

Sites by CalEnviroScreen Score

The City has a range of CalEnviroScreen scores, ranging from the 40th to 60th percentile to the 80th to 100th percentile (more negative environmental factors). The western portion of the City, south of Patterson Road has a more positive environmental factors according to the CalEnviroScreen Score.

The western portion of the City, north of Patterson Road and the eastern portion of the City, south of Patterson Road and east of BNSF has higher CalEnviroScreen score (80th to 100th percentile).

Site Analysis Summary Data

Table V-10 summarizes the Sites Inventory by the various AFFH characteristics. Table V-10 shows the distribution of projected units by income category for the following AFFH indicators compared to Citywide patterns to understand how the projected locations of units will affirmatively further fair housing: TCAC/HCD opportunity areas, median household income, predominant population, diversity index, poverty level, TCAC/HCD Opportunity Area, Low-to-Moderate Income Population, and overcrowding.

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TABLE V-10
SITES INVENTORY
CITY OF RIVERBANK
2025

			Realistic Capacity				Segregation/Integration			Access to Opportunity			
Census Tract	APN	Site #	Very Low	Low	Moderate	Above Moderate	Household Median Income(1)	Predominant Race(2)	Diversity Index(3)	Poverty Level(4)	TCAC/HCD Opportunity Area(5)	LMI(6)	Overcrowding(7)
Vacant Sites													
Single Family Residential													
3.02	075-005-013	V1	0	0	1	5	$67,365	Hispanic	56.1	22.5%	High Resource	25 - 50%	5 - 10%
3.02	075-005-026	V2	0	0	1	5							
3.04	075-017-001	V3	0	0	1	1	$80,968	Hispanic	38.7	18.5%	Moderate Resource	25 - 50%	5 - 10%
3.04	075-017-020	V4	0	0	0	1							
3.04	075-039-002	V5	0	0	1	1							
3.03	075-045-039	V6	0	0	1	7	$74,000	Hispanic	54.8	14.3%	High Resource	25 - 50%	Less than 5%
3.02	075-052-044	V7	0	0	1	1	$67,365	Hispanic	56.1	22.5%	Moderate Resource	25 - 50%	5 - 10%
3.02	075-056-031	V8	0	0	1	13							
4.06	075-057-041	V9	0	0	0	1	$149,384	White	64.7	2.5%	Highest Resource	25 - 50%	5 - 10%
4.06	075-057-042	V10	0	0	0	1							
4.06	075-057-043	V11	0	0	0	1							
3.03	075-095-008	V12	0	0	0	1	$74,000	Hispanic	54.8	14.3%	Moderate Resource	25 - 50%	Less than 5%
3.03	075-095-009	V13	0	0	0	1							
3.03	075-095-010	V14	0	0	0	1							
3.03	075-095-011	V15	0	0	0	1							
3.03	075-095-019	V16	0	0	0	1							
3.03	075-095-021	V17	0	0	0	1							
3.03	075-095-024	V18	0	0	1	1							
3.03	075-095-032	V19	0	0	1	1							
3.03	075-095-033	V20	0	0	0	1							
3.03	075-095-034	V21	0	0	0	1							
3.03	075-095-035	V22	0	0	0	1							
3.03	075-095-036	V23	0	0	0	1							
3.03	075-095-037	V24	0	0	0	1							
3.03	075-095-043	V25	0	0	0	1							
3.03	075-095-045	V26	0	0	0	1							
3.03	075-095-046	V27	0	0	0	1							
3.03	075-095-047	V28	0	0	0	1							
3.03	075-095-048	V29	0	0	0	1							
3.03	075-095-049	V30	0	0	0	1							
3.03	075-095-050	V31	0	0	0	1							
3.03	075-095-058	V32	0	0	0	1							

			Realistic Capacity				Segregation/Integration			Access to Opportunity			
Census Tract	APN	Site #	Very Low	Low	Moderate	Above Moderate	Household Median Income(1)	Predominant Race(2)	Diversity Index(3)	Poverty Level(4)	TCAC/HCD Opportunity Area(5)	LMI(6)	Overcrowding(7)
3.03	075-095-072	V33	0	0	0	1	$74,000	Hispanic	54.8	14.3%	Moderate Resource	25 - 50%	Less than 5%
3.03	075-095-073	V34	0	0	0	1							
3.03	075-095-074	V35	0	0	0	1							
3.03	075-095-076	V36	0	0	0	1							
3.03	075-095-077	V37	0	0	0	1							
3.03	075-095-087	V38	0	0	1	1							
3.03	075-095-089	V39	0	0	1	1							
3.02	132-035-010	V40	0	0	0	1	$67,365	Hispanic	56.1	22.5%	Moderate Resource	25 - 50%	5 - 10%
3.03	132-036-013	V41	0	0	1	1	$74,000	Hispanic	54.8	14.3%	High Resource	25 - 50%	Less than 5%
3.01	132-049-041	V42	0	0	1	1	$60,259	Hispanic	51.0	16.0%	Moderate Resource	25 - 50%	5 - 10%
3.01	132-049-042	V43	0	0	1	1							
3.01	132-049-043	V44	0	0	1	1							
3.01	132-049-044	V45	0	0	1	1							
3.04	132-057-010	V46	0	0	0	1	$80,968	Hispanic	38.7	18.5%	Moderate Resource	50 - 75%	5 - 10%
3.04	132-057-047	V47	0	0	0	1							
	Subtotal		**0**	**0**	**16**	**73**							
Duplex Residential													
3.04	076-016-002	V48	0	0	2	0	$80,968	Hispanic	38.7	18.5%	Moderate Resource	25 - 50%	5 - 10%
3.01	132-015-023	V49	13	10	0	0	$60,259	Hispanic	51.0	16.0%	Moderate Resource	25 - 50%	5 - 10%
	Subtotal		**13**	**10**	**2**	**0**							
Multiple Family Residential													
3.01	132-015-025	V50	7	4	0	0	$60,259	Hispanic	51.0	16.0%	Moderate Resource	25 - 50%	5 - 10%
3.04	132-045-002	V51	53	36	0	0	$80,968	Hispanic	38.7	18.5%	Moderate Resource	25 - 50%	5 - 10%
	Subtotal		**60**	**40**	**0**	**0**							
Nonvacant Sites													
Single Family Residential													
3.03	075-031-034	W1	0	0	2	8	$74,000	Hispanic	54.8	14.3%	High Resource	25 - 50%	Less than 5%
3.02	075-005-015	W2	0	0	1	5	$67,365	Hispanic	56.1	22.5%	High Resource	50 - 75%	5 - 10%
4.05	062-022-027	W3	0	0	6	10	$67,896	Hispanic	57.8	33.6%	Moderate Resource	50 - 75%	5 - 10%
	Subtotal		**0**	**0**	**9**	**23**							
Duplex Residential													
3.03	132-063-006	W4	0	0	12	0	$74,000	Hispanic	54.8	14.3%	High Resource	25 - 50%	Less than 5%
	Subtotal		**0**	**0**	**12**	**0**							
Multiple Family Residential													
3.02	075-003-011	W5	9	6	0	0	$67,365	Hispanic	56.1	22.5%	High Resource	25 - 50%	5 - 10%
3.02	075-003-012	W6	16	10	0	0							
4.06	075-069-002	W7	25	16	0	0	$149,384	White	64.7	2.5%	Highest Resource	<25%	5 - 10%
4.06	075-069-003	W8	23	15	0	0							
	Subtotal		**73**	**47**	**0**	**0**							

			Realistic Capacity				Segregation/Integration			Access to Opportunity			
Census Tract	APN	Site #	Very Low	Low	Moderate	Above Moderate	Household Median Income(1)	Predominant Race(2)	Diversity Index(3)	Poverty Level(4)	TCAC/HCD Opportunity Area(5)	LMI(6)	Overcrowding(7)
Downtown Specific Plan													
Duplex Residential													
3.01	132-010-057	X1	0	0	1	0	$60,259	Hispanic	51.0	16.0%	Moderate Resource	25 - 50%	5 - 10%
3.01	132-010-026	X2	0	0	6	0							
	Subtotal		**0**	**0**	**7**	**0**							
Mixed Use													
3.02	132-034-020	X3	120	80	0	0	$67,365	Hispanic	56.1	22.5%	High Resource	50 - 75%	5 - 10%
3.02	132-009-069	X4	13	9	0	0	$67,365	Hispanic	56.1	22.5%	Moderate Resource	25 - 50%	5 - 10%
3.01	132-011-053	X5	7	4	0	0	$60,259	Hispanic	51.0	16.0%	Moderate Resource	25 - 50%	5 - 10%
	Subtotal		**140**	**93**	**0**	**0**							
Crossroads West Specific Plan													
Sites within CWSP													
4.07	074-025-023	Y1	0	0	92	0	$144,844	White	61.8	5.0%	Highest Resource	<25%	Less than 5%
	074-025-001 - 074-025-025	Y2	0	0	258	0							
	074-014-017A	Y3	0	0	0	286							
	074-014-017B	Y4	72	48	0	0							
	074-011-004	Y5	0	0	12	0							
	074-011-015	Y6	0	0	16	0							
	074-011-017A	Y7	0	0	0	540							
	074-011-017B	Y8	0	0	96	0							
	074-011-017C	Y9	72	48	0	0							
	074-011-017D	Y10	0	0	41	0							
	074-006-016	Y11	0	0	0	295							
	074-006-023	Y12	28	18	0	0							
	074-006-024	Y13	16	11	0	0							
	074-024-001	Y14	0	0	0	1							
	074-024-002	Y15	0	0	0	1							
	074-024-003	Y16	0	0	0	1							
	074-024-004	Y17	0	0	0	1							
	074-024-005	Y18	0	0	0	1							
	074-024-006	Y19	0	0	0	1							
	074-024-007	Y20	0	0	0	1							
	074-024-008	Y21	0	0	0	1							
	074-024-009	Y22	0	0	0	1							
	074-024-010	Y23	0	0	0	1							
	074-024-015	Y24	0	0	0	1							
	074-024-016	Y25	0	0	0	1							
	074-024-017	Y26	0	0	0	1							

			Realistic Capacity				Segregation/Integration			Access to Opportunity			
Census Tract	APN	Site #	Very Low	Low	Moderate	Above Moderate	Household Median Income(1)	Predominant Race(2)	Diversity Index(3)	Poverty Level(4)	TCAC/HCD Opportunity Area(5)	LMI(6)	Overcrowding(7)
	074-024-018	Y27	0	0	0	1							
	074-024-019	Y28	0	0	0	1							
	074-024-020	Y29	0	0	0	1							
	074-024-021	Y30	0	0	0	1							
	074-024-022	Y31	0	0	0	1							
	074-024-023	Y32	0	0	0	1							
	074-024-024	Y33	0	0	0	1							
	074-024-025	Y34	0	0	0	1							
	074-024-026	Y35	0	0	0	1							
	074-024-027	Y36	0	0	0	1							
	074-024-028	Y37	0	0	0	1							
	074-024-029	Y38	0	0	0	1							
	074-024-037	Y39	0	0	0	1							
	074-024-038	Y40	0	0	0	1							
	074-024-039	Y41	0	0	0	1							
	074-024-040	Y42	0	0	0	1							
	074-024-041	Y43	0	0	0	1							
	074-024-042	Y44	0	0	0	1							
	074-024-043	Y45	0	0	0	1							
4.07	074-024-044	Y46	0	0	0	1	$144,844	White	61.8	5.0%	Highest Resource	<25%	Less than 5%
	074-024-045	Y47	0	0	0	1							
	074-024-046	Y48	0	0	0	1							
	074-024-047	Y49	0	0	0	1							
	074-024-048	Y50	0	0	0	1							
	074-024-049	Y51	0	0	0	1							
	074-024-050	Y52	0	0	0	1							
	074-024-051	Y53	0	0	0	1							
	074-024-052	Y54	0	0	0	1							
	074-024-053	Y55	0	0	0	1							
	074-024-054	Y56	0	0	0	1							
	074-024-055	Y57	0	0	0	1							
	074-024-056	Y58	0	0	0	1							
	074-024-057	Y59	0	0	0	1							
	074-024-058	Y60	0	0	0	1							
	074-024-059	Y61	0	0	0	1							
	074-024-060	Y62	0	0	0	1							
	074-024-061	Y63	0	0	0	1							
	074-024-062	Y64	0	0	0	1							
	074-024-063	Y65	0	0	0	1							

			Realistic Capacity				Segregation/Integration			Access to Opportunity			
Census Tract	APN	Site #	Very Low	Low	Moderate	Above Moderate	Household Median Income(1)	Predominant Race(2)	Diversity Index(3)	Poverty Level(4)	TCAC/HCD Opportunity Area(5)	LMI(6)	Overcrowding(7)
	074-024-064	Y66	0	0	0	1							
	074-024-065	Y67	0	0	0	1							
	074-024-066	Y68	0	0	0	1							
	074-024-067	Y69	0	0	0	1							
	074-024-069	Y70	0	0	0	1							
	074-024-070	Y71	0	0	0	1							
	074-024-071	Y72	0	0	0	1							
	074-024-072	Y73	0	0	0	1							
	074-024-073	Y74	0	0	0	1							
	074-024-074	Y75	0	0	0	1							
	074-024-075	Y76	0	0	0	1							
	074-024-076	Y77	0	0	0	1							
	074-024-077	Y78	0	0	0	1							
	074-024-078	Y79	0	0	0	1							
	074-024-079	Y80	0	0	0	1							
	074-024-080	Y81	0	0	0	1							
	074-024-081	Y82	0	0	0	1							
	074-024-082	Y83	0	0	0	1							
	074-024-083	Y84	0	0	0	1							
4.07	074-024-084	Y85	0	0	0	1	$144,844	White	61.8	5.0%	Highest Resource	<25%	Less than 5%
	074-024-085	Y86	0	0	0	1							
	074-024-086	Y87	0	0	0	1							
	074-024-087	Y88	0	0	0	1							
	074-024-088	Y89	0	0	0	1							
	074-024-089	Y90	0	0	0	1							
	074-024-090	Y91	0	0	0	1							
	074-024-091	Y92	0	0	0	1							
	074-024-092	Y93	0	0	0	1							
	074-024-093	Y94	0	0	0	1							
	074-024-094	Y95	0	0	0	1							
	074-024-095	Y96	0	0	0	1							
	074-024-096	Y97	0	0	0	1							
	074-024-097	Y98	0	0	0	1							
	074-024-098	Y99	0	0	0	1							
	074-024-099	Y100	0	0	0	1							
	074-024-100	Y101	0	0	0	1							
	074-024-101	Y102	0	0	0	1							
	074-024-102	Y103	0	0	0	1							
	074-024-103	Y104	0	0	0	1							

			Realistic Capacity				Segregation/Integration			Access to Opportunity			
Census Tract	APN	Site #	Very Low	Low	Moderate	Above Moderate	Household Median Income(1)	Predominant Race(2)	Diversity Index(3)	Poverty Level(4)	TCAC/HCD Opportunity Area(5)	LMI(6)	Overcrowding(7)
4.07	074-024-104	Y105	0	0	0	1	$144,844	White	61.8	5.0%	Highest Resource	<25%	Less than 5%
	074-024-105	Y106	0	0	0	1							
	074-024-106	Y107	0	0	0	1							
	074-024-107	Y108	0	0	0	1							
	074-024-108	Y109	0	0	0	1							
	074-024-109	Y110	0	0	0	1							
	074-024-110	Y111	0	0	0	1							
	074-024-111	Y112	0	0	0	1							
	074-024-112	Y113	0	0	0	1							
	074-024-113	Y114	0	0	0	1							
	074-024-114	Y115	0	0	0	1							
	Subtotal		**188**	**125**	**521**	**1,223**							
Rezone Sites													
Selected Rezone Sites													
4.06	075-093-025	1	25	17	0	0	$149,384	White	64.7	2.5%	Highest Resource	<25%	5 - 10%
4.06	075-014-026	2	120	80	0	0							
4.06	075-014-027	3	38	26	0	0							
4.06	075-025-010	4	40	26	0	0							
3.03	132-038-032	5	78	52	0	0	$74,000	Hispanic	54.8	14.3%	High Resource	25 - 50%	Less than 5%
3.03	075-015-009	6	24	16	0	0							
3.03	132-022-017	7	9	6	0	0	$74,000	Hispanic	54.8	14.3%	High Resource	50 - 75%	5 - 10%
3.02	075-005-025	8	13	9	0	0	$67,365	Hispanic	56.1	22.5%	High Resource	25 - 50%	5 - 10%
3.02	132-023-020	9	37	25	0	0	$67,365	Hispanic	56.1	22.5%	High Resource	50 - 75%	5 - 10%
4.05	062-021-007	10	60	40	0	0	$67,896	Hispanic	57.8	33.6%	Moderate Resource	50 - 75%	Less than 5%
4.06	075-075-052	11	62	42	0	0	$149,384	White	64.7	2.5%	Highest Resource	50 - 75%	Less than 5%
	Subtotal		**506**	**339**	**0**	**0**							
	Total		**980**	**654**	**561**	**1,319**							

Sources:

(1) US Census ACS 5-Year Estimate, 2023, Table DP03, census tract level

(2) US Census ACS 5-Year Estimate, 2022, Table B03002, census tract level

(3) US Census, Racial and Ethnic Diversity for States, Counties, and Census Tracts

(4) US Census, ACS 5-Year Estimate, 2022, Table S1701, census tract level

(5) TCAC/HCD Opportunity Maps, Composite Score, AFFH HCD Data Viewer, 2021

(6) Low to Moderate Income Population (HUD 2011-2015), Block Group, AFFH HCD Data Viewer

(7) Overcrowding, AFFH HCD Data Viewer, ACS 2017-2021

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10. Contributing Factors and Meaningful Actions

This section lists contributing factors that create, perpetuate, or increase the severity of one or more fair housing issues identified in community outreach and the analysis in this document. Section X provides meaningful actions the City will undertake to affirmatively further fair housing for special needs, racial/ethnic minorities, and low-income residents.

Enforcement and Outreach

The City's website has some information on fair housing and no information on fair housing rights and responsibilities for tenants and landlords. In addition, although the website includes a link to the Riverbank Housing Authority, which includes a link to Project Sentinal, this information should be located in a more accessible location on the website.

Contributing factors to fair housing enforcement and outreach in Riverbank include:

- Language Barriers (Priority Level – Medium): approximately 50 percent of the population speaks a language other than English. Community Development information on the City's website is provided only in English, including public hearing notices.
- Lack of local public or private fair housing outreach and enforcement (Low): The City does not provide its own fair housing outreach or enforcement. The City does provide, however, information on partnering agencies and fair housing organizations to provide assistance to tenants and landlords.
- Lack of resources for fair housing agencies and organizations on the City's website (Medium).
- Lack of local fair housing laws to support strong enforcement (Medium).
- Lack of sufficient distribution of fair housing information: The City's website does not provide housing information (High).
- Limited participation in fair housing outreach (Medium).

Segregation and Integration Patterns and Trends

Riverbank is a racially/ethnically diverse city with a moderate percentage of LMI residents and low median household incomes. When it comes to segregation and integration, patterns and trends are generally consistent across the city. Categories like female single-parent households and LMI residents are not concentrated within a particular area of the city.

However, residents living below the poverty line are somewhat concentrated in the eastern portion of the city though this could be due in part because the census tract includes a portion of Stanislaus County, east of the City of Riverbank. Contributing factors to segregation and integration patterns and trends in Riverbank include:

- Location and type of affordable housing (Priority Level – Low): Public housing is not clustered in a certain part of the City. However, there are no affordable housing developments in the southern portion of the City.
- Displacement due to economic pressures (Medium): Home values and rents have increased significantly in Riverbank over the past decade. Between 2018 and 2023, average home value increased from $276,000 to $451,000 and median rent increased from $1,129 to $1,527. In addition, about 30 percent of all households are cost burdened, meaning many households are paying too much for housing. While the UDP rates the City as having low risk of displacement, these trends indicate cost burdened and low-income households may be at risk of displacement if the cost of housing continues to rise.

Racially and Ethnically Concentrated Areas of Poverty

Riverbank is predominately Hispanic/Latino (59 percent of the population), and there are no areas of high segregation and poverty. However, the census tract that is located in Central Riverbank, east of BNSF has a higher percentage of residents living below the poverty line than other areas in the city. Contributing factors to racially and ethnically concentrated areas of poverty in Riverbank include:

- Age of housing stock (Medium): Older housing is concentrated in the northern part of the City, while the Crossroads and Crossroad West neighborhoods (Southwestern portion of the City) consists almost entirely of newer housing developments. The eastern portion of the City also includes newer housing developments.
- Land use and zoning laws (Low): Most of Riverbank is zoned for single-family residential or commercial uses.

Disproportionate Housing Needs

Cost burden among renters is moderate throughout most of the city. Cost burden among homeowners is highest in the northwestern and eastern portions of the city. Riverbank has a high percentage of large households, approximately 24 percent of all households in the city. Overcrowding is higher in central and northern Riverbank compared to the east and west portions of the city.

In addition to overcrowding and the cost burden throughout the city, the northern part of the city has an older housing stock than other areas of the city. Over 80 percent of the housing units in the northern part of the city are over 30 years old. However, according to the AFFH Data Viewer, 20 – 30 percent of the residents in this area are living below the poverty level, indicating that homeowners may not be able to afford to pay for repair and maintenance on their homes.

Contributing factors to disproportionate housing needs in Riverbank include:

- Prevalence of cost burden (Priority Level – Medium): Home values and rent has increased significantly in Riverbank over the last decade, which causes increased cost burden among homeowners and renters. According to 2017 - 2021 CHAS data, approximately 30 percent of all households in Riverbank are cost burdened.
- Lack of affordable housing in a range of sizes (High): The vast majority of housing stock (84 percent) is made up of detached single-family homes, which may not be affordable to lower-income households.
- Cost of housing maintenance and repairs (Low): Riverbank's older housing stock may indicate that a significant number of housing units are in need of repair.

Disparities in Access to Opportunities

Riverbank has areas of Highest Resource (Crossroads and Crossroads West neighborhoods), High Resource (Central Riverbank, west of BNSF), and Moderate Resource (Eastern Riverbank). The City also has a mix of economic and education scores (See Figures V-11 and V-12). Contributing factors to disparities in access to opportunities in Riverbank include:

- The availability, type, frequency, and reliability of public transportation (Priority Level – Medium): There is only one (1) fixed route for public transportation in the city.
- Lack of walkability (Low): As noted above, the walkability in Riverbank is considered 38 out of 100, which is considered a car-dependent city.
- High pollution burden (Medium): The majority of Riverbank is ranked between 61 and 80th percentile for pollution burden by CalEnviroScreen.

11. Meaningful Actions to Address Fair Housing Issues

The findings of this analysis were used to develop meaningful actions, metrics and milestones that promote inclusive communities, increase housing opportunities, and address racial/ethnic and economic disparities in the city. The contributing factors were prioritized to better formulate policies and programs and carry out meaningful actions to further fair housing. Meaningful actions to address fair housing issues are included in the housing programs located in Section X, *2023 – 2031 – Housing Goals and Policies* and are summarized below in Table V-11.

Table V-12 consists of proposed housing programs the City will pursue to specifically overcome identified patterns and trends from the above assessment and proactively affirmatively further fair housing in Riverbank. As noted, the programs are detailed with metrics and milestones in Section X, *2023 – 2031 – Housing Goals and Policies*.

TABLE V-12
Meaningful Actions
City of Riverbank

Contributing Factor	AFFH Strategy	Housing Implementation Programs
Enforcement and Outreach	Language barriers and fair housing outreach and advertisement.	• Notice the Annual Progress Report in English and Spanish to encourage public engagement (Program 5.1b). • Encourage public participation in the Housing Element Update process (Program 5.1c).
Segregation and Integration Patterns and Trends	Location and type of affordable housing and displacement due to economic pressures.	• Ensure adequate sites are available for all income groups (Program 1.1a). • Monitor development of the Crossroads West Specific Plan (Program 1.1b. • Encourage development of Accessory Dwelling Units (Program 1.1c)
Racially and Ethnically Concentrated Areas of Poverty	Age of housing stock and land use and zoning laws.	• Amend Zoning Code to remove constraints to development of special needs housing (Program 3.1j).

		• Continue to seek State and federal funding for rehabilitation of homes (Program 4.1a). • Conduct Housing Condition Survey (program 4.1c). • Discourage the land division of high density residential sites (Program 4.2a).
Disproportionate Housing Needs	Prevalence of cost-burden, lack of housing in a range of sizes, and cost of housing maintenance and repair.	• Comply with SB 166 (No Net Loss) (Program 1.2c). • Seek assistance from non-profit developers to develop homes for lower-income households (program 2.1a). • Waive fees for General Plan Amendments to increase higher density designated sites (Program 3.1b)
Disparities in Access to Opportunities	Public transportation availability, walkability, and high pollution burden	• Review off-street parking requirements for residential developments (Program 3.1d). • Implement State energy-efficient standards (Program 6.1a). • Energy conservation guidelines (Program 6.2a). • Include weatherization as a typical repair in the City's housing rehabilitation program (Program 6.3a).

SECTION VI
Housing Production Opportunities

As required by California Government Code Section 65583(a)(3), cities are compelled to produce:

> *...an inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.*

The inventory outlined above must identify specific sites or parcels that are available for residential development. The law further aims to ensure that local governments adequately plan to meet the housing needs of all economic segments of the community across all income categories. In addition to the required inventory, each city must demonstrate that the number of potential housing units specifically identified in the housing inventory satisfactorily meets the housing needs determination provided by each region's planning body. For the City of Riverbank, the Stanislaus Council of Governments (StanCOG) is the planning body responsible for allocating the housing need for each jurisdiction within the region including the City of Riverbank. The StanCOG Housing Needs Determination report projects a total need of 3,591 units for the City of Riverbank during the Sixth Cycle (2023 – 2031). Table I shows the City's Regional Housing Needs Allocation by income category.

TABLE VI-1~~I~~
City of Riverbank Regional Housing Needs Allocation 2023 – 2031

Income Category	RHNA Allocation
Extremely Low-Income Households (<30% of AMI)	485 Units
Very Low-Income Households (<50% of AMI)[1]	~~970~~ 485 Units
Low-Income Households (50% - 80% of AMI)	672 Units
Moderate-Income (80% - 120% of AMI)	594 Units
Above Moderate-Income (>120% of AMI)	1,355 Units
Total	**3,591 Units**

The City must ensure the availability of adequate residential sites to accommodate these units. Per State law, adequate sites are those which are located within proper zoning districts and have available services and facilities to encourage and provide for the development of housing for all income levels. To determine the City of Riverbank's housing capacity, an analysis of all vacant and non-vacant developable land within the city limits is required and necessary to understand the capacity limits, lengths and efforts which must be undertaken to ensure the City meets State law for the current planning period.

[1] AMI means area wide median income for Stanislaus County. It is assumed that 50 percent of the very low-income units are for extremely low-income.

A. INVENTORY OF LAND

A critical component of the Housing Element is the identification of land suitable for residential development including vacant and non-vacant sites having the potential for development of housing. To capture the City's present and future ability to provide and facilitate housing development for persons across all income categories, an exhaustive inventory of the City's available land resources and sites was conducted. This comprehensive identification of adequate sites available for housing development conducted for the City of Riverbank's 2023-2031, Sixth Cycle Housing Element supersedes the sites inventory prepared to support any previously adopted Housing Element. The sites identified in the sites inventory (Appendix H) are made up of parcels located in various areas and zones throughout the City. Each parcel listed has undergone an assessment to determine the development potential and residential unit capacity given the existing zoning standards, potential capacity under new zoning regulations, and development trends. For more detailed information, refer to Appendix H.

1. Assumptions and Methodology

The following analysis includes vacant and underutilized lands which are available for development for residential uses by virtue of size and land use designation in the Land Use Element portion of the General Plan. The land parcels used in the build-out assumptions in this study were in the City Limits or Sphere of Influence (SOI).

The densities utilized represent average densities that are within an acceptable density range as provided for in the General Plan of each Zoning District as determined by City staff and maximum density as indicated in the General Plan Land Use Element. The densities are calculated using the gross acreages of each Zoning District. Additionally, the typical densities assumed are the same that were used in the certified 2014-2023 Housing Element. Underutilized lands were broken down by size, General Plan Land Use Designation, zoning, existing use, factors affecting development, and infrastructure availability.

Government Code Section 65583.2(c)(3)(B) allows local governments to utilize "default" density standards that are "deemed appropriate to accommodate housing for lower income households." Riverbank's density range for Multiple-Family Residential is 16 dwelling units per acre and has no maximum. According to the Default Density Standard Option 2020 Census Update, default densities are established using census population figures and based on methodology detailed in Government Code section 65583.2 and for Stanislaus County, the default density is at least twenty (20) dwelling units per acre. The default density is within an acceptable density range provided for in the General Plan.

2. Realistic Capacity for Sites Zoned for Residential Uses

Government Code Section 65583.2(a) specifies each jurisdiction shall, as part of its inventory, identify sites within its jurisdiction's boundary that could have the potential for new residential development within the housing element planning period.

Sites are typically grouped by type, including vacant sites zoned for residential uses, vacant sites zoned for nonresidential use that allows residential development, residentially zoned sites that are capable of being developed at a higher density, including sites owned or leased by a city, county, or city and county, and non-vacant sites, including underutilized sites that can be developed for residential uses. This section describes characteristics of sites included in the sites inventory, an analysis of site suitability, as well as the methodology used to determine the number of units that can be reasonably developed on a site.

TABLE VI-2
Density of Example Projects
City of Riverbank

Project	Number of Units	Acreage	Zoning	Maximum Density	Density (du/ac)	Percentage Yield
James Street City of Modesto	7	0.3	R-3	29	23	88%
3600 Dale Road City of Modesto	44	1.7	MU	29	25	88%
JKB Apartments City of Modesto	206	9.3	MU	29	22	77%
Magnolia Grove City of Modesto	35	1.5	P-D	29	23	83%
Rumble/ Conant City of Modesto	50	2.3	R-3	29	21	77%
Scenic Avenue City of Modesto	41	2.3	R-3	29	17	63%
Diamond Bar East City of Riverbank	96	17.9	R-1	8	5.4	67%
Diamond Bar West City of Riverbank	58	11.3	R-1	8	5.1	64%
Hayes 4, Phase 1 City of Riverbank	45	9.36	R-1	8	4.8	60%
Hayes 4, Phase 2 City of Riverbank	49	9.4	R-1	8	5.2	65%
River Run City of Riverbank	51	9.1	R-1	8	5.6	69%

Source: City of Modesto, Final Adopted Housing Element (2023-2031)

Table VI-2 provides project data from the City of Modesto and the City of Riverbank. Based on the development capacity demonstrated by these projects, the Sites Inventory assumes seventy percent (70%) of the maximum allowable density of included parcels. This assumption reflects local data, potential site specific constraints, and necessary site improvements that would prohibit development at a site's maximum allowable density.

Additionally, to demonstrate capacity to accommodate RHNA, the City has identified sites with zoning suitable for housing development. Pursuant to Government Code Section 65583.2(c), the City is required to calculate the realistic number of units (or, realistic capacity) of the site identified.

The Available Land Inventory includes parcels in four zoning districts with varying allowable densities and development standards. The City's Zoning Code classifies each site into the following zones:

- Single Family Residential allows single-family residential uses and related activities at a maximum allowable density of 8 dwelling units per acre.
- Duplex Residential allows residential uses and related activities at a maximum allowable density of 16 dwelling units per acre.
- Multiple Family Residential allows multi-family residential uses and related activities at an allowable density above 16 dwelling units per acre.
- Mixed Use (CX-1) allows attached single-family and multi-family residential uses provided that the living units are located above the ground floor of a commercial use or adjacent to a commercial use on the same property. Detached residential uses with a minimum of 8 dwelling units per acre and attached higher density residential uses of 16 or more dwelling units per acre are permitted.

As such, Table VI-3 shows the maximum and realistic densities including income category that could be accommodated in each zoning district.

TABLE VI-3
Realistic Allowable Density per Zone
City of Riverbank

Zoning District	Max. Allowable Density (du/ac)	Realistic Allowable Density (du/ac)	Percent of Max. Density	Assumed Income Category
R-1	8	6.5	80%	Moderate and Above Moderate
R-2	16	12	75%	Moderate
R-3	No Max	20	N/A	Very Low and Low
CX-1	No Max	12	N/A	Moderate

Source: City of Riverbank, 2025

The Housing Element employs a comprehensive and iterative methodology to estimate dwelling unit capacity on a given parcel. As required by State law, the methodology includes sites that have a high potential to be developed with housing in the planning period and reflect a reasonable estimate of the dwelling unit capacity that is informed by past trends and substantial evidence. Therefore, it is assumed that realistic development capacity of the sites is less than the full development capacity allowed by the parcel's zoning or land use designation as shown in Table VI-3.

This conservative assumption is based on site-specific conditions and development standards that may reduce the development potential of a given site. Open space or parking requirements, steep slopes, and irregularly shaped parcels all impact the ability to achieve the maximum density allowed by the zoning code.

~~2.~~3. Vacant Land

Table VI-~~4~~2 depicts vacant land designated for residential land uses within the city limits and can accommodate a portion of the lower-income RHNA. Each identified site in the table is given a site number, is identified by its General Plan Land Use designation, the residential zone district, acreage, maximum density, and the realistic capacity for housing units.

TABLE VI-~~4~~2
Vacant Sites to Accommodate Lower Income RHNA
City of Riverbank

Site No.	*APN*	*GPLU*	*Zone*	*Acreage*	*Max Density*	*Realistic Capacity*
1	132-015-023	HDR	R-3	1.17	30	23
2	132-015-025	HDR	R-3	0.57	30	11
~~3~~3	132-045-002~~132-015-026~~	HDR~~HDR~~	R-3~~R-3~~	4.45~~0.34~~	30~~30~~	89~~7~~
~~4~~	~~132-045-002~~	~~HDR~~	~~R-3~~	~~4.45~~	~~30~~	~~89~~
~~5~~	~~132-051-018~~	~~HDR~~	~~R-3~~	~~0.15~~	~~30~~	~~3~~
~~6~~	~~132-017-027~~	~~HDR~~	~~R-3~~	~~0.18~~	~~30~~	~~4~~
~~7~~	~~132-017-032~~	~~HDR~~	~~R-3~~	~~0.16~~	~~30~~	~~3~~
~~8~~	~~132-017-033~~	~~HDR~~	~~R-3~~	~~0.21~~	~~30~~	~~4~~
Total Capacity				***6.19~~7.39~~ acres***		~~144~~123

Table VI-42 displays the aggregate capacity of available vacant land which can accommodate more than ~~eight~~ seven (78) percent of the Regional Housing Needs Allocation for the Lower Income category. Because sites smaller than half an acre or greater than ten acres are deemed inadequate to accommodate housing for lower-income households, all sites deemed inadequate for lower-income households have been removed from the sites inventory. ~~Sites six, seven, and eight are located within the Downtown Specific Plan.~~

TABLE VI-53
Vacant Sites to Accommodate the Moderate and Above Moderate Income RHNA
City of Riverbank

RHNA Category	*GP Land Use*	*Maximum Density*	*Total Acreage*	*Realistic Capacity*
Moderate	MDR	16 du/acre	0.~~14~~17	~~1~~2
Above Moderate	LDR	8 du/acre	~~16.80~~13.77	~~126~~103
Total Capacity			~~16.94~~13.94	~~127~~105

Table VI-53 above summarizes the capacity of vacant sites that can accommodate a portion of the moderate and above moderate income RHNA. To calculate the designated development potential in the identified vacant sites, the City determined the average densities for each Zoning District, using data from the previous Housing Element and past projects.

For a parcel-by-parcel listing of the sites that can accommodate the Below-Moderate, Moderate and Above-Moderate income RHNA, refer to Appendix H. As Appendix H will show, there are a total of ~~23~~19.~~65~~16 gross acres of vacant land planned for residential uses within the City of Riverbank. Much of this land accommodates the Above-Moderate Income RHNA for a total acreage of ~~16.80~~12.80 acres, or 10~~226~~ dwelling units. In addition, max densities were used in each District to determine the maximum residential development potential. Table VI-~~35~~ shows that ~~126~~89 units can be accommodated at typical densities (~~7.5~~6.5 Dwelling Units per Acre) whereas ~~134~~ 102 units could be accommodated at maximum densities (8 DUA) for sites with a General Plan Land Use designation of Low-Density Residential (LDR). For sites designated as Medium-Density Residential (MDR), 1 dwelling unit can be accommodated on typical residential lot of 6,000 square feet at typical densities (10 DUA) and 2 units can be accommodated per typical residential 6,000 square foot lot at maximum densities (16 DUA). Further, for a typical multi-family parcel of 5.57 acres designated High-Density Residential, 110 dwelling units can be accommodated at typical densities (20 DUA), while 165 dwelling units could be developed at maximum densities (30 DUA) ~~on a typical 5.5-acre parcel~~.

~~3.~~4. Underutilized Land

While vacant land with access to utilities offers the lowest barrier to development, the City analyzed non-vacant land to further determine the potential for residential development on underutilized properties. Underutilized properties are those where the value of the land is worth more than the buildings and structures found on the land, giving the property owner incentive to redevelop the property with new uses which may command either higher rents or increased sales prices. Because the residential ~~l~~Land in the City of Riverbank is largely built out, the Sites Inventory includes underutilized land. State law allows use of underutilized or non-vacant sites to accommodate the RHNA, and since Riverbank's vacant sites alone cannot fully meet the RHNA, the City has assessed and identified underutilized sites with the highest potential to be redeveloped or intensified with residential uses.

Non-vacant sites are only relied on to accommodate approximately ~~ten~~ seven percent of the City's lower income RHNA. Nearly all of the nonvacant properties analyzed and included in the Underutilized Sites include sites that are 1) larger than one-half (1/2) acre and 2) exclude sites that meet the criteria below. Appendix H shows that ~~21.08~~12.87 acres have the capability of developing at higher density residential uses or with greater intensity. For sites that are designated Low Density Residential, ~~118~~ 36 units can be accommodated at typical densities. For sites that are designated as Medium Density Residential, ~~10~~ 12 units can be accommodated at typical densities and for sites designated as High Density Residential, ~~124~~ 121 units can be accommodated at typical densities.

In evaluating the potential for underutilized sites to accommodate additional development during the 6th Cycle, the methodology for the Available Land Inventory considered a number of factors, including the extent to which uses may constitute an impediment to additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites, as further discussed below.

Appendix H (Sites Inventory) provides data supporting the methodology to determine underutilized sites suitable for development, including the existing uses (type of use and amount of development) located at each site, any known constraints to development, and any other relevant information which supports the City's finding that all sites identified in its inventory are suitable for redevelopment during the planning period at densities and intensities consistent with the realistic capacity assumptions identified for the site, by income level. Each of the underutilized sites in the inventory was selected based on a combination of factors rendering it suitable and likely to redevelop during the planning period.

The following factors assisted in focusing on sites with potential for redevelopment or intensification:

- Existing Use – No Structures: When there are no structures, development is more likely.
- Existing Use – Intensity: When the existing development intensity, in terms of residential density or floor area ratio, is less than the maximum permitted, this indicates an unrealized capacity for additional development. Particularly, sites where at least 0.5 acre of the site has no structures (e.g., a portion of the site is vacant, landscaped, etc.) are considered candidate sites for redevelopment.

The City's thoughtful analysis resulted in the removal of potential underutilized sites from the sites inventory based on the realistic viability of housing development due to lower degrees of underutilization. The City has also excluded from the inventory sites that:

- Have significant environmental constraints;
- Are located such that the provision of public services and infrastructure would be problematic;
- Have Williamson Act contracts;
- Are planned for schools, parks, or other public uses; and,
- Have existing structures or improvements that cannot be easily removed without incurring a significant cost (for example, sites containing more than a few outbuildings or a single dwelling).

~~4.~~5. Specific Plans

The City of Riverbank has adopted three specific plans during the twenty-first century: 1) the Crossroads Specific Plan, 2) the Downtown Specific Plan, and 3) the Crossroads West Specific Plan. This illustrates a pattern of continual growth that the City of Riverbank has experienced and facilitated, spanning more than two decades. Each Specific Plan offers unique standards for development and equally unique opportunities for housing across all income categories.

Crossroads Specific Plan

Adopted in the early 2000's, the Specific Plan was a response to the growth in demand for housing. Riverbank is strongly linked to regional housing market and trends fueled by economic forces stemming from the San Franciso Bay Area region. While the cost of housing skyrocketed in the Bay Area, housing pressures have steadily increased over time. As a consequence, the Crossroads Specific Plan, comprised of over six hundred eighty acres, allocated over ~~fifty five~~fifty-five percent to residential uses – approximately three hundred seventy-seven acres set aside for residential uses.

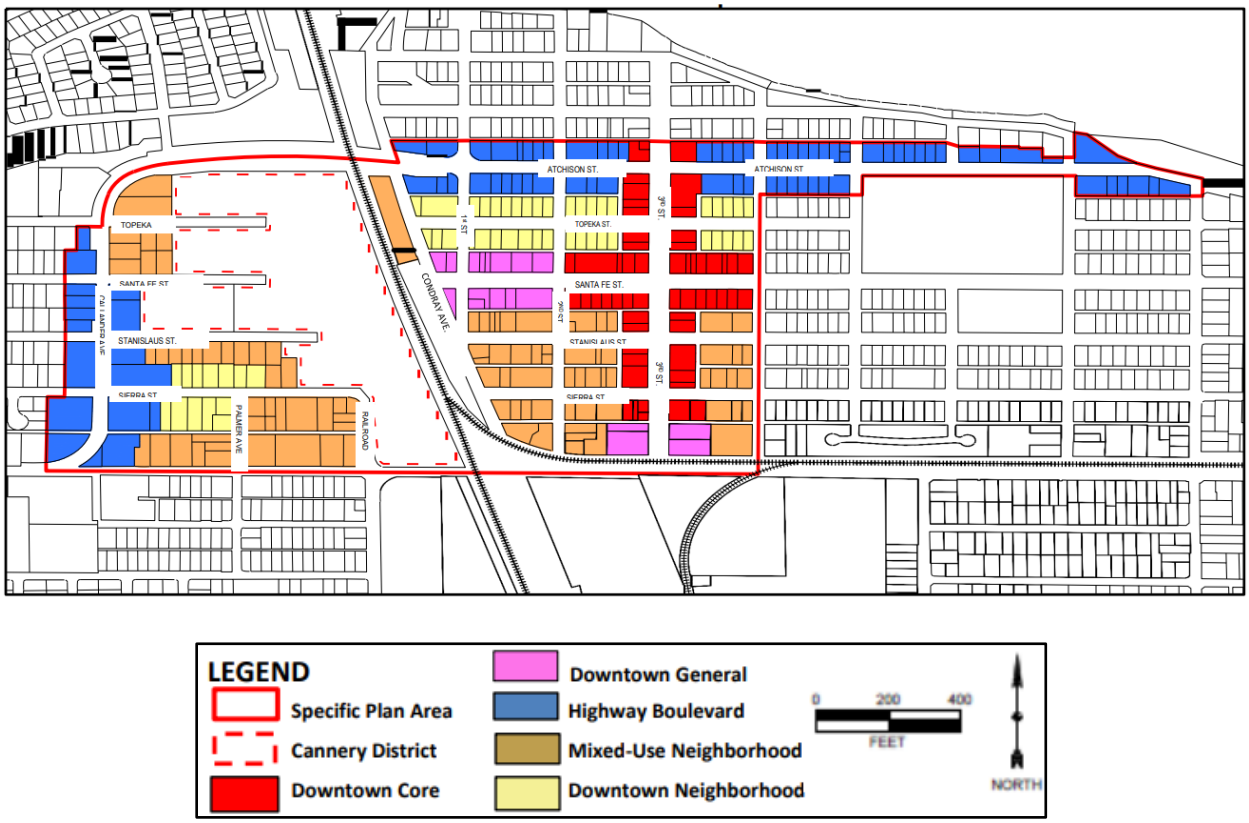
While the majority of the Crossroads Specific Plan has been built out, there remain unique opportunities for development within the bounds of the Specific Plan. Per HCD's Sites Inventory Guidebook, the City may credit sites that have been proposed, approved, or given a certificate of occupancy since the beginning of the RHNA project period. The City is in receipt of an in-fill, mixed-use development project consisting of a quick service restaurant, convenience store and 144 multi-family residential units. While this application has been received and processed, these units have not been included in the City's ability to meet the Regional Housing Needs Allocation, rather, this application illustrates the unique opportunities to provide housing opportunities within the Crossroads Specific Plan.

Downtown Specific Plan

The Downtown Specific Plan (DTSP) is identified as an Infill Opportunity Area, in which the City will focus reinvestment, and revitalization efforts including public-private partnerships, public investments, infill incentives, and other strategies. Certified and adopted by the City Council on March 25, 2013, the Downtown Specific Plan Environmental Impact Report suggests that at build-out, the Specific Plan can accommodate 53 additional single-family dwelling units and 832 multi-family dwelling units. The Downtown Specific Plan encompasses residential neighborhoods, commercial districts, and industrial areas. The area is envisioned to become a vibrant, diverse cultural hub, and a prime destination for urban living, business, civic, and social life. The Specific Plan is comprised of two halves, bisected by the B.N.S.F. Railroad with Industrial uses on the western portion and residential uses on the eastern half. The Cannery District, located west of the railroad right-of-way, is the primary redevelopment opportunity area within the Downtown Specific Plan. Of the assumed units above, 53 single-family dwelling units and 454 higher density dwelling units are anticipated to be accommodated within the Cannery District. The Cannery District presents the single largest opportunity site in the Downtown Specific Plan Area.

The DTSP includes a distinctive set of land use designations to advance the vision for the Downtown Specific Plan Area by guiding new development on vacant and underutilized land. While there is less than five (5) acres of vacant land in the Specific Plan Area, development of any site may be found categorically exempt pursuant to laws governing Class 32, Infill Development – easing potential environmental constraints for development on vacant sites identified in the Sites Inventory. Every zoning district within the DTSP allows residential uses.

Map VI-1
Downtown Specific Plan Land Use Map



Crossroads West Specific Plan

The City's newest master planned community, Crossroads West Specific Plan (CWSP), is actively being developed into one of the Central Valley's premier communities offering an amalgam of Land Uses, improving and expanding housing opportunities for all types of households with a diverse mix of housing types, abundant open spaces and easy access to regional shopping, dining and entertainment allowing for multimodal transportation throughout. The Crossroads West Specific Plan is approximately 380 acres offering a full range of land uses, including Low Density Residential, Medium Density Residential, High Density Residential and Mixed Use for an estimated gross acreage of 385.4. The Crossroads West Specific Plan Environmental Impact Report suggests at build-out, the Specific Plan can accommodate 2,~~155~~ 363 dwelling units.

The allotment of acreage for each Residential Land Use is illustrated in the following Tables:

TABLE VI-~~6~~4
Crossroads West Specific Plan
Land Use Summary – Residential Land Use

Zone Designation	Land Use	Density DU/Acre[1]	Estimated Acres	Estimated Units
LDR	Low Density Residential	~~7.5~~6.5	234	~~1,755~~1,521
MDR	Medium Density Residential	~~10~~12	~~20~~12	~~200~~144
HDR	High Density Residential	20	~~10~~15.5	~~200~~310
MU	Mixed Use	12	~~5~~59	~~60~~388
Total			**~~269~~320.5**	**~~2,155~~2,363**

(1) The average density of each Zoning District is determined by City staff ~~using past city project densities~~per the Crossroads West Specific Plan as follows:

- Lower Density Residential (LDR) – ~~7.5~~6.5 DUA
- Medium Density Residential (MDR) – ~~10~~ 12 DUA
- Higher Density Residential (HDR) – 20 DUA (Default Density)
- Mixed Use (MU) – 12~~8~~ DUA

~~(2) The maximum density of each Zoning District is derived from the General Plan Land Use Element as follows:~~

- ~~Lower Density Residential (LDR) – 8 DUA~~
- ~~Medium Density Residential (MDR) – 16 DUA~~
- ~~Higher Density Residential (HDR) – 16+ DUA~~
- ~~Mixed Use (MU) – 1218 DUA~~

The Mixed-Use Land Use designations and development scenarios are illustrated in the table below. Both Mixed Use 1 and Mixed Use 2 provide flexibility to developers for long term implementation of the Specific Plan. A combination of development options are provided within the MU 1 Plan Area: The MU 1 Plan Area could be developed with all retail/commercial uses and would result in approximately 550,000 square feet of retail space; alternatively, the MU 1 plan provides the necessary flexibility for a combination of MU 1 Commercial and MU 1 Residential containing up to 350 residential dwelling units and up to 360,000 square feet of retail/commercial development. The Environmental Impact Report (EIR) prepared for the CWSP analyzed impacts under both scenarios.

The MU 2 Plan Area will be developed as a neighborhood serving retail uses on a smaller, more intimate scale than the MU 1 area of the Specific Plan. Residential uses are permitted at the Medium or High-D~~d~~ensity rates, with an assumed development at 20 dwelling units per acre for up to half of the MU 2 site. Office uses are permitted, furthering the promotion of job creation throughout the CWSP, and further fostering a live-work-play community.

TABLE VI-~~7~~5
Crossroads West Specific Plan
Land Use Summary – Mixed Use Land Uses

ZONE DESIGNATION	LAND USE	ACREAGE	MAXIMUM DENSITY/SQ. FT.	MAXIMUM UNITS OR SQ. FT.	MAXIMUM SQ. FT.
MU 1	MIXED USE 1 (R)	54	25 du/ac	350	0
	MIXED USE 1 (C)		0.35 FAR	360,000 SQ. FT.	550,000 SQ. FT.
MU 2	MIXED USE 2 (R)	5	25 du/ac	50	N/A
	MIXED USE 2 (C)		0.35 FAR	27,000 SQ. FT.	N/A

Activity Within Crossroads West Specific Plan

Development of the planning area is actively occurring at different stages involving multiple builders, developers, and stakeholders. A Final Map has been recorded for the entire MU 1 portion of CWSP. Approximately fifty-four (54) acres of MU-1 was split into twenty-two (22) parcels to allow for development to provide a mix of commercial services, shopping opportunities to serve the community, and residential uses to provide a positive contribution to the City's dynamic housing stock. For MU-1, vertical integration of residential development in commercial areas is preferred. The Final Map includes a 9.61-acre parcel for the development of up to three-hundred-fifty (350) residential dwelling units, consistent with preferred residential development in the MU-1 Plan Area. City staff has had productive discussions with the property owner and master developer and is in receipt of concept plans submitted by the property owner, and has initiated preliminary planning efforts for the single, 9.61-acre parcel.

Further, a Tentative Subdivision Map for 1,086 residential units was approved in 2019. Development has continued in successive fashion as Unit 1, Unit 1a, and Unit 2 have recorded final maps. Approximately 215 residential dwelling units have received occupancy, or a building permit has been issued leaving approximately 871 residential lots ready for development. Public improvements and infrastructure improvements continue to develop, and public utilities are extended as phases of development occur removing many constraints for orderly, near-term development of residential projects.

Development within CWSP is not anticipated to slow. Within MU 1, the City of Riverbank has processed, approved, and facilitated the development of a major, multinational corporation and American retail chain to anchor the Mixed-Use area and has served as a catalyst for additional commercial, retail, and mixed-use applications approved and in process.

Additionally, residential development is not anticipated to slow provided the new commercial, retail, and mixed-use development activity completed and underway. Further, the CWSP offers built-in flexibility and incentives for prospective developers to continue the development and build-out of the Planning Area. For example, architecture, design, and site plan review require no discretionary approval. Proposals to construct within CWSP shall be subject to ministerial review by the Community Development Director prior to issuance of a building permit; thus, expediting review periods, shortening periods between application and approval. Further, the Development Agreement established for the Crossroads West Specific Plan provides System Development Fees at a reduced price per unit to encourage and attract development within the City of Riverbank, specifically in the Crossroads West Specific Plan. A full list of parcels within the Crossroads West Specific Plan is included in Appendix H. Program 1.1b has been added to the Housing Element to help maintain its vacant sites inventory specifically within the CWSP. In accordance with Government Code Section 655832(h) and (i), Program 1.1b will aid in facilitating the development of sites within the CWSP to ensure a sufficient number of sites designated for higher density are developed.

6. Sites utilized in 5th Cycle to Mmeet Llower lincome RHNA and

In accordance with Government Code Section 65583(c), vacant parcels from both the 4th and 5th Cycles and non-vacant parcels from the 5th Cycle may be reused in this Housing Element to accommodate lower-income housing, provided they are rezoned to allow projects that have at least 20 percent of the units set aside to be affordable for lower-income households to be allowed by right (i.e., can be approved administratively without requiring Planning Commission or City Council approval).

TABLE VI-8
Sites Utilized in 5th Cycle to Meet Lower-Income RHNA
City of Riverbank

APN	Address	Size	Zoning	Existing Use
132-015-025	0 Front Street	0.57	R-3	Vacant
075-003-011	0 Topeka	0.73	R-3	Accessory Structure
075-003-012	2767 Topeka	1.31	R-3	Single-Family Dwelling
075-069-002	5425 Roselle Avenue	2.07	R-3	Single-Family Dwelling
075-069-003	5401 Roselle Avenue	1.92	R-3	Single-Family Dwelling

To ensure consistency with Government Code Section 65583.2(c), Program 1.1d has been added to this Housing Element to implement a by-right non-discretionary approval process option for sites listed with the 6th Cycle Site Inventory for vacant sites that were previously identified in the 4th and 5th Cycle Housing Elements, and for non-vacant sites previously identified in the 5th Cycle Housing Element when a developer builds at least 20 percent affordable units to accommodate the low- and very low-income RHNA.

B. CITY EFFORTS TO INCREASING HOUSING FOR ALL

In addition to the diligent efforts by staff to maintain and uphold compliance with state housing law, City staff continues its substantial effort to provide and ensure housing and housing opportunities for everyone in its community across all income levels.

Over the course of the past planning cycle, the City of Riverbank proposed two (2) staff-initiated Zoning Ordinance Amendments. The first amendment to the Riverbank Municipal Code (Ordinance No 2021-007, adopted December 14, 2021) refined regulations related to Accessory Dwelling Units (ADUs); this amendment to the City's Municipal Code was enacted to comply with the State legislation in effect at that time, as set forth in Government Code Sections 65852.2 and 65852.22. Program 1.1c, *Accessory Dwelling* Units is included in the Housing Element to promote the use of Accessory Dwelling Units and facilitate an update to the Riverbank Municipal Code to be consistent with recent State law related to Accessory Dwelling Units. The City also took new, creative approaches to housing development, design, and standards. Specifically, the City of Riverbank adopted the Tiny House Villages Ordinance (Ordinance No. 2023-003, adopted January 24, 2023), making possible the ability to develop a detached single family-residence as small as one hundred fifty (150) square feet[2] in size.

1. Tiny House Villages Ordinance

~~In early 2023~~On January 24, 2023, ~~City Staff initiated~~City Council approved a ~~a proposed~~ Zoning Ordinance Amendment to modify the Riverbank Municipal Code to add Tiny House Villages as a permitted use in Residential and Mixed-Use zoning districts in the City of Riverbank (Ordinance No. 2023-003). The Zoning Ordinance amended the uses permitted in the R-1, Single-Family Residential district, R-2, Duplex Residential district, R-3, Multiple Family Residential district, and CX-1, Mixed Use district. The Tiny House Villages Ordinance also provided Density, Design and Development Standards.

The density requirement for each zoning district shall adhere to and maintain consistency with the density requirement in the City's General Plan:

- R-1, Single-Family Residential District – up to eight (8) dwelling units per net acre.
- R-2, Duplex Residential District - up to twelve (12) dwelling units per net acre.
- R-3, Multiple Family Residential District – sixteen (16) or more dwelling units per net acre.

[2] Within a tiny house village.

- CX-1, Mixed Use District – eight (8) or more dwelling units per net acre for detached residential uses.

A permitted Tiny House can range in size from as small as one hundred fifty (150) square feet up to eight hundred fifty (850) square feet, less than the previously permitted minimum size requirement of nine hundred (900) square feet for a single dwelling unit or mobile home located within each Residential Zoning district. This City-led effort provides increased opportunity, flexibility, and affordability for housing across all income categories within the City of Riverbank.

2. Accessory Dwelling Units (ADU)

An accessory dwelling unit is a secondary dwelling unit on residentially zoned property with an existing single-family or multifamily residence. Accessory dwelling units anticipated to be built between 2023 and 2031 are credited towards the City's RHNA obligation. New legislation has loosened restrictive development standards, removed discretionary approval, and streamlined the approval and permitting process for Accessory Dwelling Units (ADUs). Based on recent changes in state law reducing the time to review and approve ADU applications, requiring ADUs that meet requirements to be allowed by right, eliminating discretionary review, and removing other restrictions for ADUs, it is anticipated that the production of ADUs will increase in the Sixth Cycle Housing Element planning period.

The City of Riverbank adopted an ADU Ordinance (Ordinance 2021-007), modifying the Riverbank Municipal Code to be consistent with state law allowing applications for ADUs to be evaluated and ministerially approved whereby no discretionary approval is required.

To reduce financial constraints, the City of Riverbank partnered with Stanislaus County to develop and offer ~~six (6)~~seven (7) free preapproved ADU plans for property owners within its jurisdiction. Eliminating development barriers in conjunction with reducing affordability considerations by way of preapproved ADU plans, the option for ADUs is increasingly becoming a more viable option for housing.

TABLE VI-9
Accessory Dwelling Units
City of Riverbank

Year	Permitted ADUs
2022	1
2023	5
2024 ~~(Jan. 1 to July 1)~~	8
Total	14
Annual Average	5
Source: City of Riverbank	

As shown in Table VI-9, The City issues approximately four to five permits a year for Accessory Dwelling Units. This trend is expected to continue, if not increase due to recent legislation requiring ministerial review of applications for Accessory Dwelling Units. The City of Riverbank conservatively estimates that ADUs will be produced at the same rate throughout the eight (8) year planning period; this estimation would result in 402 Accessory Dwelling Units over the course of the planning period – adding to the housing stock by an additional 402 housing units across income categories. Program 3.1j has been added to the Housing Element to maintain the Pre-Approved ADU Plans in coordination with Stanislaus County and to prepare additional informational materials including information about available funding opportunities for ADUs.

C. AVAILABLE LAND OUTSIDE OF THE CITY LIMITS

Outside the city limits, but within the Sphere of Influence (SOI), there is unconstrained vacant and agricultural land. In the most unconstrained areas for growth, there are about 177 acres of vacant and agricultural land that is designated to allow for residential uses.

As Table VI-6 shows, at build out, the residential land outside the City limits, but in the Sphere of Influence, could potentially support 360 single family units and 1,180 multi-family units. At maximum densities, the available land in the Sphere of Influence could support 2,448 residential units. The parcels examined do not have a Williamson Act contract.

Pre-zoning and zoning would occur for the identified properties, or those determined to have equal or better feasibility for affordable housing development, such that densities typical of the R-3 zone could occur. However, the City would encourage developers to achieve higher densities in lands rezoned or pre-zoned R-3 by requiring a minimum average density.

TABLE VI-~~6~~10
Residential Land Within the Sphere of Influence

	Gross Acres (1)	Average Density (2)	Average Unit Potential	Maximum Unit Potential (3)
Residential Land in the adopted Sphere of Influence (4)				
Lower Density Residential	48	~~7.5~~6.5	~~360~~312	384
Medium Density Residential	118	~~10~~12	~~1,180~~1,416	1,888
Higher Density Residential	11	20	220	416
Mixed Use	0	0	0	0
Total	***177***		***~~1,760~~1,948***	***2,448***

(1) Total gross acres of land outside the city limits, but within the Sphere of Influence that supports residential development excluding parcels with Williamson Act contracts, based on the General Plan Environmental Impact Report.

(2) The average density of each General Plan Land Use Designation is determined by City staff using past city project densities as follows:

- Lower Density Residential (LDR) – ~~7.5~~6.5 DUA
- Medium Density Residential (MDR) – ~~10~~ 12 DUA
- Higher Density Residential (HDR) – 20 DUA (Default Density)
- Mixed Use (MU) – 12~~18~~ DUA

(3) The maximum density of each General Plan Land Use Designation is derived from the General Plan Land Use Element as follows:

- Lower Density Residential (LDR) – 8 DUA
- Medium Density Residential (MDR) – 16 DUA
- Higher Density Residential (HDR) – 16+ DUA; Maximum Density utilized for analysis is 30 DUA.
- Mixed Use (MU) – 16+~~18~~ DUA

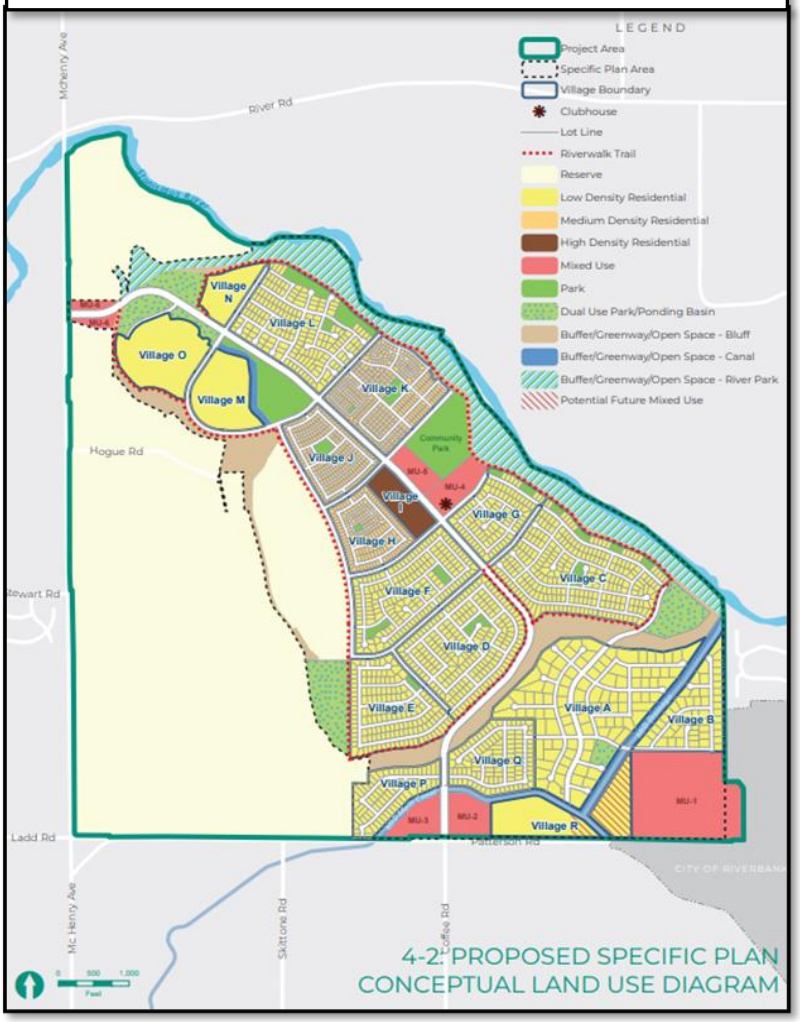
(4) Includes lands that are designated for residential development (LDR, MDR, HDR, MU).

Source: City of Riverbank, 2024; Stanislaus County Parcel Database and GIS; Stanislaus County Assessors Database, 2024; J.B. Anderson Land Use Planning, 2024.

1. River Walk Specific Plan

~~The City is currently in the planning stages of processing t~~The proposed River Walk Specific Plan (RWSP), located in the unincorporated area of Stanislaus County and adjacent to the City of Riverbank, north of Patterson Road/State Route (SR) 108, east of McHenry Avenue, and approximately two miles northwest of downtown Riverbank.

MAP VI-2
Proposed Specific Plan Conceptual Land Use Diagram (Riverwalk)



The ~~River Walk Specific Plan (~~RWSP~~)~~ is a Mixed-Use development project that provides for a range of residential housing densities, neighborhood-scale retail, commercial and health/ medical services, private clubhouse, public recreation, a pedestrian/bicycle trail system, and extensive open space and landscaping. The land uses proposed include Low Density Residential, Medium Density Residential, High Density Residential, Mixed-Use, and Parks/Recreation, including all infrastructure and utilities necessary to service the development. The RWSP estimates between 2,432 – 2,682 residential units, and between 375,000 and 875,000 square feet of Mixed-Use for commercial, office, service, or retail use, as well as some transitional care facilities. A substantial portion of the RWSP is intended to be an age-restricted active adult community, while a portion will not be age restricted. Land designated for High Density Residential and Mixed-Use together span over approximately seventy (70) acres and provide for densities above sixteen (16) dwelling units per acre accounting for well over 1,180 dwelling units.

The overall Project Area includes four (4) distinct planning boundaries: 1. Specific Plan Area (Plan Area): all lands identified and included within the River Walk Specific Plan; 2. Sphere of Influence Expansion Area: includes the area covered by the proposed Sphere of Influence Amendment and contains the entire project area including reserve land; 3. Berghill Boundary: contains areas within the Specific Plan Area that are controlled by the Project Applicant; 4. Project Area: includes the Sphere of Influence expansion area, including the Specific Plan and the Berghill Boundary.

The RWSP will require and include the adoption of a Specific Plan, a Sphere of Influence (SOI) expansion and annexation of land into the City of Riverbank. The overall project area and SOI expansion covers approximately 1,522 acres. The RWSP covers approximately 997 acres of the SOI expansion area, and would include~~s an~~ annexation into the Riverbank City limits, extension of infrastructure to the annexed area to serve development, and the subsequent development of the annexed area. The City of Riverbank's pre-zoning for River Walk will include the Specific Plan (SP) zoning designation for the entire Specific Plan area. The intent for creating and establishing an SP zoning designation for the entire Project Area allows for more imaginative and flexible designs for development projects. This built-in flexibility provides developers with the ability to mitigate possible geological issues, topographical concerns, and many environmental factors.

Development of the River Walk Specific Plan requires City Council adoption, Annexation and Sphere of Influence Modification consideration by the Stanislaus LAFCo~~O~~. Additional entitlements required include a General Plan Amendment, pre-zoning, SOI amendment, Municipal Services Review amendment, Neighborhood Electric Vehicle Plan (and EV ordinance), Tentative Map(s), Development Agreement, and Annexation into CFD 2016-01. The exact land use plan is yet to be determined; however, Table VI-7 is a summary of the assumed residential land uses and the estimated units that could provide for Riverbank, based on the adopted General Plan land use mix.

The RWSP is included in this Housing Element as reference only and is not proposed to be counted towards the City's RHNA for the 6th Cycle Planning Period.

TABLE VI-117
Riverwalk Specific Plan
Summary of Assumed Residential Land Uses

Table 4.1.1: River Walk Specific Plan Land Use Summary

MAP SYMBOL	ACREAGE	DENSITY RANGE	UNIT OR SF RANGE
LDR – Low Density Residential	467.18	0 – 8 DU/AC	1,550
MDR – Medium Density Residential	78.70	8 – 16 DU/AC	702
HDR – High Density Residential	10.02	16 + DU/AC	180
MU – Mixed-Use (Outside of Community Core)	58.39	16 + DU/AC 0.25 FAR	0 – 350 DU 275,000-635,000 SF
MU – Mixed-Use (Inside of Community Core)	5.35	16 + DU/AC 0.50 FAR	0 – 100 DU 110,000-220,000 SF
MU – Mixed-Use (Clubhouse)	8.01	0.50 FAR	20,000 SF
Park	43.34	N/A	N/A
B/G/OS - Bluff	68.53	N/A	N/A
B/G/OS - Ditch	23.34	N/A	N/A
B/G/OS - River Park	69.77	N/A	N/A
Park - Ponding Basin	41.01	N/A	N/A
Reserve	60.17	N/A	N/A
ROW	63.37	N/A	N/A
TOTAL	**997.18**	—	**2,432 – 2,682 DU** **375,000 – 875,000 SF**

NOTES: SF = SQUARE FEET;
DU/AC = DWELLING UNITS PER ACRE;
FAR = FLOOR-AREA-RATIO;
N/A = NOT APPLICABLE.

D. PIPELING PROJECTS

Residential developments planned, approved, and permitted, but not yet built can be credited towards the City's RHNA for the Sixth Cycle Housing Element if it can be demonstrated that the units will be built by the conclusion of the Sixth Cycle Housing Element planning period. The City of Riverbank has received, processed, and approved several projects which have yet to be completed. Table VI-118 provides an overview of projects that are proposed and in process or have been entitled. Based on the City's review of pending projects, there are no known barriers to development, phasing, or other factors that would prohibit the pending project from being completed during the Sixth Cycle – all units are anticipated to be completed during the planning period. Further, the City of Riverbank collaborates with applicants, developers, and owners to account for progress and updates on current and future projects.

TABLE VI-128
Approved and Pending Projects
City of Riverbank

Project	Status	Low	Moderate	Above Moderate	Total	Progress
CR Unit 1	Under Construction	-	-	1	1	Anticipated completion by end of October, '24.
CR Unit 2	Under Construction	-	-	95	95	Anticipated completion by end of June, '25.
Diamond Bar East	Under Construction	-	-	48	48	Under Construction.
Pocket Avenue Senior Apartments	Approved		28		28	Pending submittal and approval of construction documents
Elmwood Estates	Under Construction	-	-	21	21	Under Construction.
Lucky House	Approved	38	-	-	38	SApproved; seeking grant funding.
Riverbank Village	ApprovedUnder Constructions	8	-	-	8	Plans under review; Permits will be issued soon.Building permits issued; units under construction.
Countryside III	Approved	-	-	22	22	Master Plans in plan check; permits will be issued soon.
Pocket Ave. Senior ApartmentsSierra Village	Pending Approval	-	2822	-	2822	Pending submittal.approval.
Sierra VillageHeritage II	Pending ApprovalUnder Construction	-	22-	47-	4722	City staff is working closely with Developer.Under construction.
Heritage IIRivers Edge	Pending ApprovalApproved	-	-	4736	4736	Off-site improvements under construction. Phase II of development.
Rivers Edge	Pending Approval	-	-	36	36	City staff is working closely with Developer.
Total		**46**	**5050**	**105270**	**366201**	

Pocket Avenue Senior Apartments
Pocket Avenue Senior Apartments is an approved, senior apartment, 28-unit project. This development is located on a single, 2.01-acre parcel (APN 075-090-063). This development is located within a Moderate Resource Area, and will likely improve the fair housing conditions in Riverbank.

Lucky House
Lucky House is an approved, multi-family, 38-unit tiny home project. This development is located on a single, 2.25-acre vacant parcel (APN 075-010-065). This development is located within a Moderate Resource Area, and is somewhat likely to improve fair housing conditions in Riverbank.

Riverbank Village
Riverbank Village is an approved eight-unit, low-income, tiny home housing project. This development is spurred by Stanislaus Equity Partners (STEP) who specialize in providing safe, affordable, clean and dignified housing units for people of all income categories. STEP works with faith based organizations utilizing excess property to build clusters of tiny homes and provides housing options for vulnerable families. This approved project is located within a Moderate Resource area, and will likely improve the fair housing conditions in Riverbank.

Countryside III
Countryside III is an approved, 22-unit development located in the eastern portion of Riverbank, and is intended to serve above-moderate income households. Presently, building plans, street names and addressing have been approved. The developer is working on completing offsite improvements including curbs, gutters, sidewalks and street improvements. The City of Riverbank has approved the Final Map and the Final Map has since been recorded. The developer must complete the offsite improvements before building permits can be issued. This approved project is located within a Low Resource area, and is somewhat likely to improve fair housing in Riverbank.

Sierra Village
This market rate Tiny Home project was initially submitted in August of 2024 with notable design challenges. Since then, City staff have worked closely with the applicant and engineer to address these design issues. Through continued coordination with the City and applicant, design modifications have been executed to improve the project's functionality, compatibility, and alignment with the City's goals and standards. This project is located within a Low Resource area, and if approved, will likely improve fair housing in Riverbank.

Heritage II
Heritage II is an approved project consisting of 47 single-family residential units located on a 5.86-acre parcel intended to serve above-moderate income households. This approved project is located within a Low Resource area, and will likely improve the fair housing conditions in Riverbank.

Rivers Edge
Rivers Edge is an approved project with 36 lots. This development is intended to serve above-moderate income households. This project recently received approval for all street names and addressing, and staff continues to work with the applicant for solar and landscape master plan submittals.

E. ABILITY TO ADDRESS REGIONAL HOUSING NEED ALLOCATION

Table VI-~~8~~13 shows the residential holding capacity after accounting for unit production during the current housing element period. The table goes on to show the remaining capacity at average densities within the city limits in subdivisions and vacant land. Finally, unit potential outside the city limits, but within the Sphere of Influence is shown.

It is important to note that lands within the City's General Plan Boundary, but outside of the Sphere of Influence, are focused specifically on lands within the proposed Riverwalk Specific Plan. As referenced previously, the Riverwalk Specific Plan is currently being processed by City staff. The proposed specific plan includes a Sphere of Influence Expansion and Annexation component as part of the overall application to be reviewed and considered by the Riverbank City Council and Stanislaus LAFCO.

Presently, the City of Riverbank has enough land available to meet the RHNA for Above Moderate income with a surplus of ~~704~~ 190 units. However, the City of Riverbank does not have enough land to accommodate its total RHNA for very low- and low~~- and moderate~~ income~~ with an aggregate shortfall of 790 units~~. In compliance with the requirements of Government Code Section 65583(c)(1), the General Plan Land Use Element should provide a sufficient portion of land in its multi-family land use categories to meet its obligation to provide sites suitable for the production of needed housing affordable to extremely low, very low, low, moderate, and above moderate-income households. As the analysis above shows, at average densities, the City lacks sufficient land available and designated for multi-family development to provide for the needs of all income groups.

TABLE VI-~~13~~9
City's Ability to Meet Its Regional Housing Needs
City of Riverbank

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
HCD RHNA Allocation (June 2023 – Dec 2031)	485	485	672	594	1,355	3,591
Units Produced **(1)**					121	121
Net Allocation to be Met	485	485	672	594	1,234	3,470
Allocation to be Met	~~1,642~~485	485	672	594	1,234	3,470
Holding Capacity Within the City Limits						
		Very Low	Low	Moderate	Above Moderate	Total
Potential Units in Vacant Land		73	~~110~~50	~~25~~18	~~126~~73	~~261~~214
Potential Units in Underutilized Land		73	~~124~~47	~~10~~21	~~118~~23	~~252~~164
Potential Accessory Dwelling Units		0	~~23~~0	~~10~~40	~~9~~0	~~42~~40
Potential Units in Pipeline Projects		0	46	50	~~270~~105	~~366~~201
Potential Units in Downtown Specific Plan		140	~~585~~93	~~1~~7	0	~~586~~240
Potential Units in Crossroads West Specific Plan		188	~~318~~125	~~144~~515	~~1,415~~1,223	~~1,877~~2,057
Rezone Sites		506	339	0	0	845
City Holding Capacity Subtotal		***980***	***~~1,206~~700***	***~~240~~651***	***~~1,938~~1,424***	***~~3,384~~3,755***
Surplus (Shortfall)		***10***	***28***	***57***	***190***	***285***
Total Buffer (%)		***1%***	***4%***	***10%***	***15%***	***8%***

(1) Units with final building permits issued between January 2024 and June 30, 2024, as identified in Table VIII-1~~Holding Capacity Outside City Limits (2)~~

1. Addressing Regional Housing Needs Shortfall

The City of Riverbank has an obligation to rezone land suitable to accommodate the remaining lower-income and moderate-income Regional Housing Needs Allocation shortfall of a combined 790 units. Together, the City of Riverbank with community input, has identified opportunity sites to rezone at a minimum of 20 units per acre and has developed a program outlining the details and timeline to completion. The rezone program will allow the development of higher-density multifamily housing; ~~fifteen~~ 1514 sites have been identified and prioritized based on suitability, feasibility, and community input. Table ~~X~~ VI-110 below illustrates the candidate sites identified for rezone. The ~~fifteen~~ 11 sites listed below will be rezoned to facilitate additional residential development. Each site will be rezoned to allow a minimum density of ~~twenty~~ 20 dwelling units per acre and the City assumes that for each site identified to be rezoned, the realistic residential density of the site is equal to the required minimum density of the relevant zone district. The rezone program will account for an additional ~~1,656~~ 845 dwelling units. Program 1.1a of this Housing Element requires the rezoning of parcels reflected in Table VI-14. Each potential rezoned site will be zoned for a minimum 20 units per acre, have the capacity to accommodate at least 16 units, and be available for development in the planning period where water, sewer, and dry utilities can be provided. Additionally, sites rezoned will permit owner-occupied and rental multi-family uses by-right pursuant to Government Code Section 65583.2(h) and (i) for developments in which 20 percent or more of the units are affordable to lower-income households.

TABLE VI-~~10~~14
Candidate Sites for Rezoning
City of Riverbank

Site No.	APN	Acres	Existing General Plan	Proposed General Plan	Zoning District	Proposed Zoning District	Current Use	Anticipated Affordability Level	No. of Potential Units – 20 DU/AC Min. Unit Count	Very-Low	Low
~~1~~	~~074-006-023~~	~~2.88~~							~~58~~		
~~2~~	~~074-006-024~~	~~0.85~~							~~17~~		
~~3~~	~~074-011-017~~	~~18~~							~~360~~		
~~4~~	~~074-014-016~~	~~6.5~~							~~130~~		
~~5~~	~~074-025-023~~	~~9.5~~							~~190~~		
1~~6~~	075-093-025	2.1	C	HDR	C-1	R-3	Vacant	Lower	42	25	17
2~~7~~	075-014-026	10	MU	HDR	C-1	R-3	Vacant	Lower	200	120	80
3	075-014-027	3.2	MU	HDR	C-1	R-3	Vacant	Lower	64	38	26
~~48~~	075-025-010	3.3	MU	HDR	C-1	R-3	SFR	Lower	66	40	26
~~59~~	132-038-032	6.5	I	HDR	LI	R-3	Vacant	Lower	130	78	52
6~~10~~	075-015-009	2	I	HDR	LI	R-3	SFR	Lower	40	24	16
7~~11~~	132-022-017	0.75	MU	HDR	C-1	R-3	Vacant	Lower	15	9	6
8~~12~~	075-005-025	~~6~~1.08	LDR	HDR	R-1	R-3	Vacant	Lower	~~120~~22	13	9
9~~13~~	132-023-020	3.1	MU	HDR	C-1	R-3	Vacant	Lower	60	37	25
10~~14~~	062-021-007~~39-048~~	~~5~~6.4	MDR	HDR	R-1	R-3	SFR	Lower	~~128~~100	60	40
~~15~~11	~~062-021-007~~075-075-02	~~5~~5.19	LDR	HDR	R-1	R-3	Vacant	Lower	~~100~~104	62	42
Total		**42.22**							**739**	**506**	**339**

F. ENVIRONMENTAL CONSTRAINTS

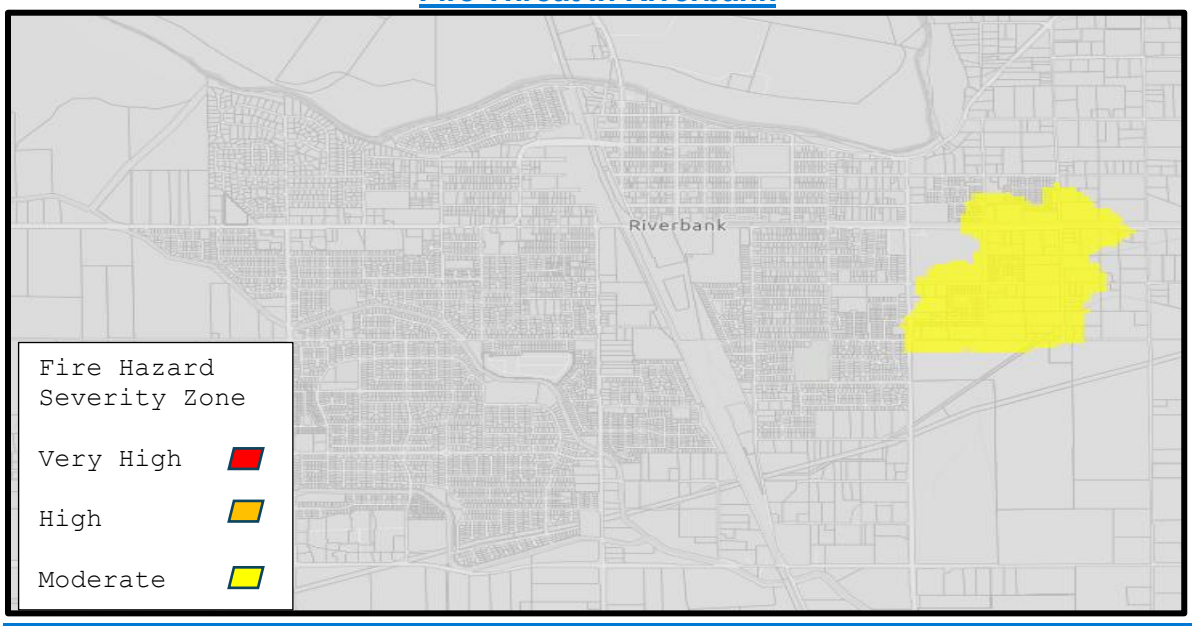
A community's environmental setting affects the feasibility and cost of developing housing. Environmental issues range from the availability of water to the suitability of land for development due to potential exposure to seismic, flooding, wildfire and other hazards. If not properly recognized and accommodated in residential design, these environmental features could potentially endanger lives and property. This section summarizes these potential constraints on residential development in Riverbank.

1. Fire

The risk of wildland fires is related to a combination of factors, including winds, temperatures, humidity levels and fuel moisture content. Of these four factors, wind is the most crucial. Steep slopes also contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Features in some parts of the Planning Area, including highly flammable vegetation, and warm and dry summers with temperatures often exceeding 100 degrees Fahrenheit, create a situation that results in potential wildland fires. Where there is easy human access to dry vegetation, fire hazards increase because of the greater chance of human carelessness. High hazard areas include outlying residential parcels and open lands adjacent to residential areas.

Riverbank has a low to moderate susceptibility to wildfire primarily located on the eastern portion of the City. The figure below shows the results of CAL FIRE's Fire Hazard Severity Zone (FHSZ) maps based on factors that influence fire likelihood and fire behavior

Fire Threat in Riverbank



2. Earthquake

Riverbank is located within the Central Valley and the San Joaquin fault zone is the closest to the City. The fault is made up of numerous buried faults extending along the western margin of the Great Valley. As is common throughout the State of California, Riverbank has a high earthquake risk.

There are a series of specific hazards that are caused by earthquakes, including ground rupture, ground shaking, liquefaction and expansive soils. Due to its seismic and geologic conditions, the City of Riverbank is subject to several of these hazards, including a moderate potential for liquefaction, as well as a moderate to high potential for expansive soils depending on the specific soil conditions and location

For all new construction, the City requires geotechnical reports and other analyses, where necessary, to analyze potential soils or geologic hazards. The California Building Code, enforced by the City's Community Development Department, contains design and development regulations to ensure that all new construction will withstand forces associated with geologic and seismic hazards.

~~1.~~3. Flooding

Floodplain zones are determined by the Federal Emergency Management Agency (FEMA) and used to create Flood Insurance Rate Maps (FIRMs) that designate these zones. These maps assist cities in mitigating flooding hazards through land use planning and building permit requirements. FEMA outlines specific regulations for any construction, whether residential, commercial or industrial within 100-year floodplains. A floodplain is the relatively level land area on either side of the banks of a stream subject to flooding. The 100-year floodplain is the area subject to flooding based on a storm event that is expected to occur every 100 years on average, based on historical data.

The greatest external risk to flooding is the Stanislaus River but the topography of the City, situated above the river on its northern edge, benefits the City and decreases major flooding problems. According to the most recent FIRM for the City of Riverbank, dated September 26, 2008, shows the majority of Riverbank outside the FEMA 1% annual chance floodplains (100-year flood). Lastly, development consistent with the City's Building Code will minimize risks associated with geological and flooding hazards and allow development of property consistent with the uses and densities allowed by the City of Riverbank's Zoning Code.

4. Williamson Act Contract

There are no parcels within the City Limits of Riverbank that are under a land conservation contract (Williamson Act Contract).

SECTION VII
Housing Production Constraints

A. NON-GOVERNMENTAL HOUSING CONSTRAINTS

The ability to fulfill housing needs is greatly constrained by factors prevalent in the housing market. Non-governmental factors inhibiting the availability of housing include financing costs, land prices, and construction costs.

1. Financing Costs

Low mortgage interest rates and the prevalence of sub-prime mortgage lending led to a sharp increase in home construction and purchases, as well as increased demand and prices. These factors had more influence on home ownership and construction than any other. The reverse of this is now being seen as increasingly troubled credit markets are hesitant to finance loans, which is putting a damper on the real estate market. Policies set at the federal level affecting interest rates, subsidies, material, and wage costs, are cost factors which are little influenced by local policy, desire, or action.

Stanislaus County experienced a high population increase over the recent decades. Primarily, the discovery of the San Joaquin Valley as an area with affordable housing to San Francisco Bay Area commuters resulted in an increase in local values and almost all new housing stock was built for this income group. Table VI-1, Average Home Sales Price, reflects the average sale price for a single-family home in Stanislaus County from 2015 to 2023.

TABLE VII-1

Average Single-Family Home Sales Price
Stanislaus County, 2015 – 2023

YEAR	AVERAGE HOME PURCHASE PRICES	ANNUAL % CHANGE
2015	$246,511	-
2016	$266,854	8.25%
2017	$288,645	8.17%
2018	$312,658	8.32%
2019	$326,854	4.54%
2020	$359,583	10.01%
2021	$425,542	18.34%
2022	$456,070	7.17%
2023	$454,096	-0.43%

SOURCE: California Association of Realtors, Median Prices of Existing Detached Homes, December 2023.

Since 2019, interest rates for homebuyers steadily increased from a low 2.75 percent in 2020 to a peak of 7.08 percent in November of 2022 for a fixed-rate, 30-year mortgage. The current economic climate is uncertain and still affected by increased inflation and supply chain disruptions. In an effort to assist potential lower-income home buyers with their home purchase, the City has a First Time Home Buyer Downpayment Assistance Program.

The homebuyer program is designed to provide assistance to eligible homebuyers in purchasing homes and provides this assistance in the form of a deferred payment "silent" second priority loan as "Gap" financing toward the purchase price and closing costs of affordable housing units that will be occupied by the homebuyers. The Program is administered by the City's Housing Division.

2. 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 1.1a to ensure that there are adequate sites available throughout the planning period to accommodate the City's RHNA and Program 1.2c to establish a formal procedure to monitor no-net-loss of capacity to meet the City's RHNA. The City has not received requests to develop at densities below assumptions in the Sites Inventory.

3~~2~~. Construction Costs and Land Prices

According to Cary Pope, a local Real Estate Agent and housing developer, the average hard costs (raw building materials, excluding permit fees, impact fees, etc.) is about 125 to 150 dollars a foot. For a 1,500 square foot construction, which equals $225,000. Construction costs have increased about 100 percent in the last decade. This phenomenon is reflected in the escalation of median priced homes in Stanislaus County over the past decade. According to Cary Pope, a local developer, finished lot prices in Riverbank area are about $125,000 per lot, where raw land within the City is about $150,000 per acre.

While land values in Stanislaus County have increased over the last few years, this has corresponded to a major increase in the demand for and price of building materials. Increases in building material prices can be attributed to demand from growing economies in foreign countries such as China, India and South America and supply chain issues, along with workforce shortages. While there will be fluctuations in the commodities markets, experts agree that the costs of raw materials—such as steel, copper, dry wall, plastics, asphalt, and diesel—are not going to go down as long as demand from other countries continues, and demand for housing continues as well.

4~~3~~. Housing Costs

Riverbank median home prices have steadily increased, with the December 2023 median home value in Riverbank at $454,096.

Table VI-2, Median Home Values and Rents, indicates a comparison of home values in Stanislaus County.

TABLE VII-2
Median Home Values – November 2023

Location	Median Home Value	% of County Median
CERES	$433,247	96.86%
MODESTO	$427,902	95.66%
OAKDALE	$532,911	119.14%
PATTERSON	$504,335	112.75%
RIVERBANK	$461,094	103.08%
SALIDA*	$473,568	105.87%
TURLOCK	$462,943	103.49%
STANISLAUS COUNTY	$447,313	100.00%

***SOURCE*:** Zillow Home Values Index, November 2023

*Unincorporated Communities in Stanislaus County

Even with this sharp decline in housing prices, the income needed to purchase a median-priced home places it beyond the reach of most individuals in Stanislaus County and the City of Riverbank. The rise of the "working poor" elicits the demand for more affordable housing, both rental and for purchase. In most cases, it takes two incomes just to pay the rent or mortgage. Two full-time workers earning minimum wages earn just enough to be able to afford the fair market rent for a two-bedroom unit in Stanislaus County of $1,528.

TABLE VII-3
Comparison of Salary Ranges and Rental/Mortgage – 2022 Stanislaus County

OCCUPATION	MEAN SALARY HOUR/MONTH FULL-TIME	MAX RENT / MORTGAGE PAYMENT	MAXIMUM HOME LOAN AMOUNT*
MINIMUM WAGE WKR	$16.00 / $2,560	$768	$108,501
RETAIL SALESPERSON	$18.08 / $3,133	$940	$144,507
RECEPTIONISTS	$19.05 / $3,303	$991	$155,190
PRE-SCHOOL TEACHER	$23.59 / $4,088	$1,226	$204,518
CONSTRUCTION LABORER	$24.91 / $4,317	$1,295	$218,908
AUTO MECHANIC	$25.45 / $4,412	$1,324	$224,878
TRUCK DRIVER	$25.21 / $4,370	$1,311	$222,238
COMPUTER USER SUPPORT SPEC.	$31.57 / $5,472	$1,642	$291,486
POLICE OFFICER	$44.31 / $7,680	$2,304	$430,233

One person working full-time in Riverbank needs to earn at least $23.00 per hour to keep within the 30 percent affordability guidelines and be able to afford the fair market rent for a one-bedroom unit ($1,188). Table VI-3 shows a comparison of salaries and rental/mortgage payments. Table VI-4 shows the HUD fair market rent guidelines for 2024.

TABLE VII-4
Final FY 2024 FMRs by Unit Bedrooms

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2024 FMR	$1,143	$1,188	$1,528	$2,153	$2,536

SOURCE: HUD Final FY 2024 FMR Summary for Stanislaus County, California

Table VI-1 shows the average sale prices for homes in Stanislaus County from 2015 to 2023. As indicated in the table, the average sales price for homes increased from $246,511 in 2015 to $454,096 in 2023, representing a decrease of 84 percent. The average home price is not affordable for most of the workers shown in Table VI-3. For example, only the registered nurse's annual salary would allow for the purchase of the average priced home in Stanislaus County or the City of Riverbank.

54. Consumer Expectation

While consumer preference has generally been toward a detached single-family dwelling, the high costs associated with owning and maintaining a single-family home, as well as a shifting desire to be closer to urban amenities, may result in households being more willing to accept alternatives to that lifestyle by accepting smaller lots, high densities, and innovative approaches to today's housing needs.

B. GOVERNMENT CONSTRAINTS

Constraints, often called "soft costs" are contributing to an increasingly large percent of the cost of affordable housing, as well as to housing in general. Soft costs include requirements by local governments that, while necessary, may seem excessive when affordable housing is a community's goal. Some of the charges attributable to each house are:

- water and sewer connection fees;
- traffic control improvements;
- legal and consulting fees;
- interest (passed on to buyers) during up to 2 years while waiting for approvals;
- environmental studies;
- park fees;

- sidewalks;
- roads;
- inspection fees; and
- school fees

1. Building Codes and Enforcement

While minimum building codes enforced by State law are essential to the physical construction of safe and lasting housing, additional standards controlling the design or safety precautions may increase the cost of affordable housing.

The City has not adopted local amendments to the various uniform building and housing codes adopted by the State of California (Title 24 of the California Code of Regulations, 2022). The City is currently utilizing the 2022 edition of the California Building Code. The City applies a flexible approach to code enforcement to avoid the displacement of lower-income residents and to assure that reasonable accommodations can be made for modifications addressing handicapped accessibility. The City applies a flexible approach in its inspection process for older homes in need of rehabilitation to focus on health and key safety problems and to assure the occupants are not forced from their homes due to the high cost of complying with current building code requirements.

The City links building code enforcement activities to housing rehabilitation programs. At the beginning of housing rehabilitation program review there is a property evaluation, and items are considered for repair and property cleanness. There is also a property pest inspection. During project construction there are project inspections, progress and evaluation reports of work being complete, building inspection, and final inspection. After the project is complete there are annual inspections. If staff identifies an item of concern on the documented inspection sheet at annual inspection, or if the Neighborhood Improvement Officer identifies a city code violation and/or receives a property complaint, the housing department will be notified. An automatic interior/exterior inspection letter is sent to property owner. Inspection is conducted and items of concern are worked on until items are cleared.

2. On- and Off-site Improvements

Land improvements can be categorized as those designated to modify the existing parcel of land, an on-site improvement, or those to modify the exterior, or off-site areas. The City of Riverbank Public Works Department is responsible for reviewing all off-site improvements. Such public off-site improvements include curbs, gutters, sidewalks, pavement, adequate drainage, and street lighting. These have been deemed necessary to maintain the public health, safety, and welfare standards for a residential community.

Site improvements are a key component of new development and include roads, water and sewer, and other infrastructure necessary to serve the new development. Improvement requirements are regulated by the City's subdivision ordinance. Within the existing City limits, off-site improvement requirements are typically limited because the infrastructure needed to serve infill development is already in place.

Where off-site improvements are required, they typically relate to local improvements to existing facilities to accommodate higher density development or to repair or replace aged infrastructure.

Street improvement standards can have a significant impact on housing costs. The right-of-way and pavement requirements allow for slightly narrower streets in residential areas than in many communities. Minimum pavement widths of 50 feet or more for collector streets and 40 feet of more for residential streets are common among local jurisdictions. Residential streets in Riverbank require a 40-foot part-width standard to provide for two driving lanes, one parking lane and curb, gutter, and sidewalk adjacent to the parking lane. The City has also approved narrower streets – 36 feet in width is feasible in certain cases.

Required street improvements include curbs, gutters, and sidewalks of at least four feet in width. The minimum sidewalk improvement standard is consistent with accessibility requirements for persons with disabilities and is less than in many communities.

Storm drainage facilities are the responsibility of the subdivider. City standards address proper grading and erosion control on-site, including avoiding sedimentation or damage to off-site property. Payment of mitigation for drainage impacts is included within the City's development impact fee.

Internal sanitary sewers and appropriate off-site sanitary sewers are required for all proposed development. Installation is required to comply with City policies and Standard Specification. At the time of filing of the final map or parcel map, subdividers are required to pay sewer connection fees and front foot assessments.

Internal water transmission pipelines and appropriate off-site connection facilities are required for all proposed development. Installation is required to comply with City policies and Standard Specifications. All water and sewer lot services are required to extend two feet past the sidewalk and be between three and five feet of one interior side property line of each lot in any proposed subdivision.

Although the City's site improvement requirements add to the cost of new housing, the City believes its standards are reasonable and necessary to promote the health and safety of residents living in new residential developments.

3. Fees

While fees can contribute significantly to increased housing costs, the Riverbank Planning Division has attempted to minimize these costs for the developer. Although the costs listed below still amount to a substantial sum, the City has traditionally set these fees below their costs to provide the service.

The county has adopted a Public Facilities Fee for both unincorporated areas as well as incorporated areas. The public facilities fees are collected at the building permit stage.

This fee was deemed necessary in order that Stanislaus County could provide the needed services and facilities because of new growth. The City of Riverbank requires these fees to be paid prior to issuance of building permits.

The county and the cities have reached mutual agreement to cause collection of the appropriate public facilities fee at the building permit stage.

Pursuant to 1986 legislation (AB 2926) school districts can directly levy developer fees to defray the costs of accommodating new students. The current School Impact Fee for new residential construction in the Riverbank Unified School District is $4.79 per square foot and $5.17 per square foot for Sylvan School District, starting July 1, 2024. Beyond this legislation, school districts are attempting to gain full mitigation to school impacts at or during legislative actions by elected officials.

According to the State Department of Housing and Community Development, local jurisdictions throughout the state have tended to increase the burden of fees placed on new housing to finance infrastructure, primarily as a result of property tax reductions brought about by Proposition 13. The Department now assumes that typically fees comprise of 10% to 15% of the construction cost of a new home. Since most fees are levied on a per-unit basis, it is economically advantageous for a developer to build more expensive homes. The per-unit fees which add as much as $40,000 to a single home cost are significantly impacting lower cost units.

In 2015, the City amended the Riverbank Municipal Code Section 150.30: System Development Fees to provide provisions for the Deferral of System Development Fees to help alleviate the overall cost of the City's System Development Fees. This completed Program 3.1e of the 2014-2023 Housing Element.

All fees are posted on the City's website for transparency. Government Code Section 65940 ensures that the public has access to a jurisdiction's planning and financial documents, planning applications, General Plans, Zoning Ordinance, Zoning Map, and other planning-related documents as well as financial documents, including fee schedules, current and historical budgets and financial reports, and an archive of fee, cost of service, and equivalent studies. To ensure consistency with Government Code Section 65940, Program 3.1h, *Planning and Finance Transparency,* has been added to require that planning and financial documents are published on the City's website no later than December 31, 2026.

4. Processing and Permit Procedures

Expeditious processing and permit procedures can minimize development costs dramatically. Delays often occur in the approval process, which translate into increased housing costs. The City of Riverbank follows differing processing procedures for various planning transactions. Amendments to the General Plan and zoning modifications must go before the Planning Commission and City Council for passage, averaging 60 to 120 days~~, since changes of this nature are only considered at three scheduled City Council~~

~~meetings per year~~. This could potentially restraint housing production because this restriction can prevent timely approvals for projects that rely on rezoning or General Plan Amendments, ultimately slowing the pace of housing production. It also reduces flexibility for addressing evolving housing needs and responding to development opportunities throughout the year. Processing time for a housing development (single- or multi-family) with appropriate zoning and General Plan designations would take approximately 90 days if the project applicant is responsive in submitting a complete application in a timely manner.

Applications for residential subdivisions are processed within a 3 to 5 month period; however, applications that are more complex may take up to 12 months because of project pre-planning, site constraints and environmental review. Site plan review typically takes 1-2 months. Processing time is largely determined by the significance of project related issues. The City meets state-required timelines for the approval of development permits. The time required for development approval is not generally a constraint or substantial cost to housing developers.

To expedite the permit processing procedures, City staff hold a Pre-Application Review conference to provide upfront feedback on proposed projects to increase approval certainty for applicants.

Tentative maps for subdivision development are required to pass the Planning Commission and need City Council approval. All other permits, variances, or transactions of this type must be presented before the Planning Commission for their final approval. When an environmental impact report is required, six months or more will be added to the processing period. Further discussion related to the processing time of various development application is provided in Appendix C.

Senate Bill 35 (2017) provides a streamlined, ministerial approval process for multifamily housing developments in California jurisdictions that have not met their state-mandated housing goals. Eligible projects must be on infill sites, comply with objective zoning standards, include a required percentage of affordable units (10% or 50%, depending on RHNA shortfalls), and pay prevailing wages. These projects are approved without CEQA review or public hearings. The City of Riverbank currently does not have any written procedures for SB 35. Program 3.1j has been added to establish these procedures.

Housing Element law 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 but are not limited to 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.

Processing times for development review may vary, based on the size of the project and extent of environment review required, and can range from six months to more than one year if an Environmental Impact Review (EIR) is required.

When an application is submitted, it is reviewed within 30 days to verify that it is complete or the application is notified that it is incomplete. Once the application is complete, typical processing time align with the requirements of the State Permit Streamlining Act of 1992. The City makes a determination of CEQA streamlining or exemption within 30 days of receiving a complete application. As noted above, typical processing time is about one month for a single-family home, and about four to six months for a multiple-family housing project, unless delayed by the environmental clearance process due to significant environmental impacts.

The majority of residential permits in Riverbank are for single-family residential projects. Table VII-5 shows the average time between entitlement approvals and building permit application submittals for residential development projects during the 4th and 5th Cycle Planning Period.

TABLE VII-5
Recent Entitlement and Building Permit Process Times, 5th Cycle

Development Type	Entitlement Approval	Building Permit Application Submittal
Multi-Family Development Projects		
Riverbank Central Apartments	04/15/2014	03/18/2016
Riverbank Family Apartments	06/17/2008	08/14/2009
Single-Family Development Projects		
Diamond Bar East / LGI Homes	03/21/2023	03/23/2023
Crossroads Unit 1 / DMG Homes	03/10/2021	03/18/2021
Crossroads Unit 2 / KB Homes	12/15/2023	01/18/2024
Countryside 1 / McRoy Wilbur	07/02/2020	07/03/2021
Countryside 2 / DR Horton	03/21/2023	08/09/2023
River Terrace / Ward Villas / McRoy Wilbur	03/21/2023	05/30/2023
Source: City of Riverbank, 2025		

The processing of planning permits in the City of Riverbank is restricted to the number of planners employed by the City. The City of Riverbank currently employs a Community Development Director and one (1) Associate Planner to handle planning applications. Given the thousands of development applications that are expected in the 6th Cycle Planning Period, it is recommended that the City supplement its planning staff to handle the work. Building Permit processing times are consistent with other neighboring cities in the County. The City also included Program 3.1j to establish a procedures for SB 35 and SB330 (see Section X, *2023 – 2031 – Housing Goals and Policies*).

5. Site Plan Review

Site plan review is required for proposals to construct anything except one single-family dwelling, duplex, triplex, or four-plex on appropriately zoned property. Site plan review occurs before the Planning Commission prior to issuance of a building permit and would occur concurrently with all other Planning Commission related review of the subject project. The Planning Commission will review the site plan, floor plans of all buildings, and a landscape plan, pursuant to the requirements of the zone. The Planning Commission may not deny a project during this review based on use; only impose conditions that ensure the project meets the development standards set forth in the Zoning Ordinance. Therefore, site plan review does not add significant time to the approval process when other discretionary approvals are required. The average processing time for site plan reviews is 8 weeks.

Refer to *Appendix C: Processing Time for Various Development Applications* and *Appendix E: Exactions and Processing Fees* for more information about the approval process and estimated time and fees associated with various development projects.

Staff makes every attempt to work closely with project applicants from project conception to completion in order to increase the likelihood of a favorable project recommendation to the Planning Commission. Initial submittals are highly encouraged and generally contribute to the successful approval of the project. More than 90% of projects that receive a favorable staff recommendation go on to be approved by the Planning Commission. Multifamily development applications are typically approved by the Planning Commission provided they conform to the Community Character and Design Element of the General Plan and comply with other applicable General Plan goals and policies, zoning requirements, and State health and safety requirements.

Architecture and Site Plan Review is required of anything other than a single-family dwelling, a duplex, a triplex or a four-plex on a parcel. The review includes, but is not limited to, comparison of the project with the Architectural and Subdivision Design Standards.

Annexations to accommodate residential development or bring existing development into the City normally do not take more than six months. A specific plan must be prepared for the proposed annexation area prior to application for annexation. If a subdivision map or any other entitlement process is associated with annexation proceedings, it would occur concurrently to expedite the process.

6. ~~Constraints to Persons with Disabilities~~Planning for a Variety of Housing Types

~~In January of 2002, amendments to Section 65008 of the Government Code required localities to analyze potential and actual constraints upon housing for persons with disabilities, demonstrate efforts to remove government constraints, and include programs to accommodate housing designed for disabled persons. As part of the Housing Element process, the City analyzed its Zoning Ordinance, permitting~~

~~procedures, development standards, and building codes to identify potential impediments. The City has not identified any significant constraints to housing for persons with disabilities or reasonable accommodations for persons with disabilities.~~

Single Family: The Zoning Code and specific plans accommodate single family housing in a range of densities. Single family housing can be built as large lot rural developments, low and medium density subdivisions, medium or high density cluster or small lot housing, and high density attached housing.

Multifamily: Multifamily housing is accommodated in a range of densities, from high density residential developments at a minimum of 16 units per acre to a maximum of 25 units per acre for high density residential developments in the Crossroads West Specific Plan. The General Plan Land Use Designation of High Density Residential does not have a maximum units per acre requirement.

Multifamily housing can be constructed as apartments, townhomes, condominiums, and as mixed-use housing above or in conjunction with commercial or office uses in the Mixed Use Zoning District. Single-family, duplex and multifamily dwellings are permitted in the Multiple Family Residential District R-3 Zone. In order to support multifamily housing on sites that accommodate lower income households, Program 3.1l, *Multiple Family Residential R-3 Zone*, to limit development of single family units to: a single-family dwelling replacing an existing single-family dwelling on one for one basis; a single-family dwelling on an existing lot of eight thousand (8,000) square feet or less; or single-family dwellings that are part of a housing development with the majority of units affordable to extremely low, very low, and/or low-income households.

Manufactured Housing: State law requires that manufactured housing, when constructed as a single family dwelling on a permanent foundation, be treated as a conventional single family home subject to the same development standards as a single family residential dwelling on the same lot would require, except for architectural requirements limited to its roof overhang, roofing material, and siding material. Manufactured homes are permitted in the Single-Family Residential R-1 Zone, Duplex Residential District R-2 Zone, and Multiple Family Residential District R-3 Zone subject to 1) that the manufactured home if no more than ten (10) years has elapsed between the date of manufacture and the date of application for a permit to install a manufactured home; 2) installed on a permanent foundation; and 3) subject to review and approval by the Community Development Director with respect to lot orientation, siding material, roofing materials, and roof overhang, to the greatest extent feasible, compatibility with surrounding structures.

The City has set standards for manufactured homes in regards to flood hazard reduction. These standards are the following:

A. All manufactured homes that are placed or substantially improved, on sites located:

1. Outside of a manufactured home park or subdivision;
2. In a new manufactured home park or subdivision;
3. In an expansion to an existing manufactured home park or subdivision; or
4. In an existing manufactured home park or subdivision on a site upon which a manufactured home has incurred substantial damage as the result of a flood, shall within Zones A1-30, AH, and AE on the community's Flood Insurance Rate Map, be elevated on a permanent foundation such that the lowest floor of the manufactured home is elevated to or above the base flood elevation and be securely fastened to an adequately anchored foundation system to resist flotation, collapse, and lateral movement.

B. All manufactured homes to be placed or substantially improved on sites in an existing manufactured home park or subdivision within Zones A1-30, AH, and AE on the community's Flood Insurance Rate Map that are not subject to the provisions of division (A) will be securely fastened to an adequately anchored foundation system to resist flotation, collapse, and lateral movement, and be elevated so that either the:

1. Lowest floor of the manufactured home is at or above the base flood elevation; or
2. Manufactured home chassis is supported by reinforced piers or other foundation elements of at least equivalent strength that are no less than 36 inches in height above grade.

C. Upon the completion of the structure, the elevation of the lowest floor including basement shall be certified by a registered civil engineer or licensed land surveyor, and verified by the community building inspector to be properly elevated. Such certification and verification shall be provided to the Floodplain Administrator.

Parking Requirements: the Zoning Code requires a two-car garage, with a minimum clear width of 18 feet and a clear depth of 19 feet six inches in the direction of travel for manufactured housing, while no appliances or other objects may intrude into the garage space area. For mobile home parks, two (2) spaces are required for each mobile home space plus one visitor parking space for every five mobile home spaces. The spaces may be constructed in tandem, excluding visitor parking.

These parking requirements for mobile and manufactured homes are not constraints to housing development because they are consistent with standard residential parking practices and do not impose excessive or unusual burdens. The two-car garage requirement for manufactured homes ensures adequate parking without reducing buildable area, and the tandem parking option for mobile home parks allows for flexible site design. Additionally, the visitor parking ratio is modest and does not significantly impact overall project feasibility or density.

Mobilehome Park: Mobilehome parks are allowed in the Duplex Residential R-2 Zone as a conditional use.

Definition of Family: The City's Zoning Code defines "Family" as, "an individual, or two or more persons related by blood or marriage, or a group of not more than five persons who are not related by blood or marriage, excluding servants, living together as a single housekeeping unit in a dwelling unit…" Program 5.1b has been added to the 2009-2014 Housing Goals and Policies to update the definition of "family" and "single-family residence" to comply with all federal and State fair housing laws.

The definition should not distinguish between related and unrelated persons and should not impose limitations on the number of persons that may constitute a family. This definition will allow for a broad range of living situations that could accommodate the needs of persons with disabilities. The updated definition for Family and Dwelling, Single Family Residence was updated on February 10, 2015, by the City of Riverbank City Council with Ordinance No. 2015-002. The new definition for "Family" is one or more persons occupying a dwelling unit and living as a single housekeeping unit, and distinguished from a group occupying a boarding house, lodging house, motel, or hotel. The new definition for "Dwelling, Single Family Residence" is a residential building containing one (1) dwelling unit on one (1) lot. All rooms within the single-family attached dwelling shall be interconnected. Single-family dwelling shall include a dwelling that is constructed for the purposes of providing supportive and transitional housing.

Residential Care Facilities: Small ~~R~~residential care homes that provide food, shelter, and care for compensation to ~~less than seven~~six or fewer persons ~~not of the immediate family~~ are allowed by right in all residential zoning districts. Small residential care homes are treated as a single family home and allowed as a permitted use in all residential zones subject to the same requirements of the same type in the same zone. Large ~~R~~residential care homes for more than seven people are permitted with a use permit in the Multiple Family Residential Zone. There are no maximum concentration requirements for residential care facilities.

The Zoning Code a Residential Care Home as "a home operated as a boarding home and in which nursing, dietary and other personal services are furnished to convalescent, invalid or aged persons in return for compensation; but in which are performed no surgical or other primary treatments such as are customary provided in sanitariums or hospitals and in which no persons are kept or served who normally would be admissible to a mental hospital." Program 3.1j, *Amendments to the Riverbank Municipal Code and Specific Plans* has been added to amend the Zoning Code to remove the definition of Residential Care Home, add the definition for Residential Care Facility, and to permit residential care facilities in the CX-1, *Mixed Use CX-1 Zone* and to permit residential care facilities for 7 or more residents in all zones that permit residential uses.

Single Room Occupancy: Currently, the City does not have regulations for the establishment of single room occupancies (SROs) in the City. Program 3.1j, *Single Room Occupancy*, is included to amend the Zoning Code to add provisions for SROs, including permitting SROs in the Single-Family Residential R-1 Zone and establishing development standards.

Farmworker Housing: In 2014, the City updated the Zoning Code to permit farmworker housing that is no more than 36 beds in a group quarters or 12 units in the Single-Family Residential District R-1 Zone. However, the Zoning Code does not include a definition of agricultural worker housing and to clarify that an agricultural worker housing project shall be considered an agricultural use and shall be permitted in all zoning districts that allow agricultural uses consistent with Health and Safety Code Section 17021.5. Program 3.1j has been added to update the Zoning Code to explicitly define, and provide zoning provisions for farm worker and employee housing in accordance with California Health and Safety Code Sections 17021.5 and 17021.6.

Emergency Shelters: As noted in Section IV, *Housing Supply and Needs* and Table D-1, *Residential Types Permitted by Zone*, Emergency Shelters are permitted in the Multiple Family Residential District R-3 Zone, and subject to a Conditional Use Permit in the C-1, *Neighborhood Commercial,* C-2, *General Commercial,* and CM*, Commercial-Industrial* Zoning Districts. Emergency shelters are only subject to those development and management standards that apply to other residential developments within the same zone. The City does not require any additional development standards for Emergency Shelters.

Low Barrier Navigation Centers: Low barrier navigation centers are a housing first, low barrier, temporary, service-enriched shelter that are identified by State law. AB 2162 requires jurisdictions to further streamline approval of eligible low barrier navigation center applications in areas zoned for mixed use and residential zones permitting multifamily uses, subject to specific criteria. The City's Zoning Code does not address these recent requirements. Program 3.1j has been added to address these requirements.

Transitional and Supportive Housing: In 2014, the City updated the Zoning Code to define transitional and supportive housing consistent with the requirements of State law. The Zoning Code permits transitional and supportive housing as residential uses, subject to the same permit requirements and development standards applicable to residential uses of the same type of development (single family or multifamily).

AB 101 requires jurisdictions to further streamline approval of eligible supportive housing applications, including allowing supportive housing by right in all zones that allow residential and mixed use. The City's Zoning Code does not address these recent requirements. Program 3.1j has been added to revise the Zoning Code to ensure that transitional and supportive housing are allowed in residential and mixed-use zones subject to the same standards as a residence of the same type in the same zone consistent with Government Code Section 65583(c)(3), and to allow eligible supportive housing as a by-right land use in zones where multifamily and mixed uses are permitted pursuant to Government Code Sections 65650 through 65656.

Condominium Conversions: The City's subdivision ordinance refers to the State Subdivision Map Act for requirements for condominium conversion. The conversion requirements include providing notice to tenants and offering tenants the right to exclusive contract for purchase in condominium, community apartment or stock cooperative projects.

Off-Street Parking: Due to increased development costs and site limitations, minimum off-street parking requirements can pose a constraint on housing for persons with disabilities. The City currently requires to two off-street spaces per dwelling unit except for the following housing types:

- Rooming or boarding house: One space per every 300 square feet of ground floor area. Spaces inside a garage may be counted toward meeting the requirement.

These decreased off-street parking ratios may reduce constraints on housing for persons with disabilities.

However, with only one (1) standard for multi-family sites at two (2) spaces per unit, smaller multi-family projects may be negatively impacted by this requirement. Program 3.1d of the 2014-2023 Housing Element has been completed to ~~consider~~ reduce~~d~~ parking standards for multi-family projects in the R-2 and R-3 zones. The City shall provide this information at the planning counter, on the City's website and in other public spaces to increase awareness.

In addition, the City will review the Zoning Code annually to determine if any amendments need to be made to the Parking standards for multi-family and special housing, to reduce constraints to multi-family housing development.

Housing for Disabled Persons: On January 1, 2002, SB 520 became effective and required local jurisdictions to analyze local government constraints on developing, maintaining, and improving housing for persons with disabilities. In accordance with SB 520 and Government Code Section 65583(a)(7), the City recognizes the importance of providing housing for persons with disabilities. The City has since conducted a review of development applications and processing for adherence with the American Disabilities Act (ADA). This review addresses constraints during the entitlement processing stage as well as during the issuance of building permits for minor alterations.

The City allows group homes/residential facilities of six or fewer as a permitted use in the Single-Family Residential District R-1 Zone, the Duplex Residential District R-2 Zone, and Multiple Family Residential District R-3 Zone but not in the Mixed-Use District CX-1 Zone. As noted above, Program 3.1k, *Residential Care Facilities* is included to update the Zoning Code to add definitions for Residential Care Facility and to permit the Residential Care Facility use in the Mixed-Use District CX-1 Zone.

The Lanterman Development Disabilities Act (Lanterman Act) is that part of California law that sets out rights and responsibilities of persons with developmental disabilities. The Lanterman Act impacts local zoning ordinances by requiring the use property for the care of six or fewer disabled persons to be classified as a residential use under zoning.

The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. Such retrofitting is permitted under the California Building Standards Code. The City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint.

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City's requirements for building permits and inspections are the same as for other residential projects and are straightforward and not burdensome. City officials are not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

Reasonable Accommodation: The City of Riverbank has not adopted a universal design ordinance governing construction or modification of homes using design principles that allow individuals to remain in those homes as their physical needs and capabilities change. The City has added the development of a Universal Design Ordinance as a Program during this planning period. The City will refer to the HCD website to develop guidelines and a model ordinance consistent with the principles of universal design. On February 10, 2015, the City Council adopted a Reasonable Accommodation Ordinance which addresses reasonable accommodation policies for persons with disabilities. This ministerial action assists persons with disabilities in requesting reasonable accommodation.

Specifically, the reasonable accommodation provides that in order to make housing available to an individual with a disability, any eligible person may request a reasonable accommodation in land use, zoning and building regulations, policies, practices and procedures. Requests for reasonable accommodation shall be in writing and provide the following information:

1. Name and address of the individual(s) requesting reasonable accommodation;
2. Name and address of the property owner(s);
3. Address of the property for which accommodation is requested;
4. Description of the requested accommodation and regulation(s), policy or procedure for which accommodation is sought; and
5. Reason that the requested accommodation may be necessary for the individual(s) with the disability to use and enjoy the dwelling.

Requests for reasonable accommodation shall be reviewed by the Community Development Director. The Community Development Director shall issue a written decision on a request for reasonable accommodation within 30 days of the date of the application and may either grant, grant with modifications, or deny a request for reasonable accommodation. If necessary to reach a determination on the request for reasonable accommodation, the Community Development Director may request further information from the applicant consistent with fair housing laws, specifying in detail the information that is required. In the event that a request for additional information is made, the 30-day period to issue a decision is stayed until the applicant responds to the request.

The written decision to grant, grant with modifications, or deny a request for reasonable accommodation shall be consistent with fair housing laws and based on the following factors:

1. Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities, as defined and protected under federal and state fair housing laws;
2. Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the fair housing laws;
3. Whether the requested accommodation would impose an undue financial or administrative burden on the city; and
4. Whether the requested accommodation would require a fundamental alteration in the nature of the city's land use and zoning or building program.

Program 3.1g, *Accessibility in Housing and Public Facilities*, has been added for the City to continue to implement state requirements to include accessibility in housing and public facilities for persons with disabilities and for the City to review and revise findings for approving reasonable accommodation requests to ensure that they do not pose any barriers to housing for persons with disabilities.

Density Bonus: In 2014, the City updated the Zoning Code to allow density bonuses for affordable and senior housing projects in accordance with State law. Section 153.185, *Affordable Housing Density Bonus*, of the Zoning Code requires density bonuses and other incentives for housing in accordance with State law, including Government Code Title 7, Division 1, Chapter 4.3 (Density Bonuses and Other Incentives). Program 1.1f, *Density Bonus Law*, requires the City to review and update the Zoning Code as necessary to be consistent with State law.

Inclusionary Housing Requirements: The City does not have any requirements that obligate developers to provide or fund housing at specific affordability levels. However, Program 2.1l, *Inclusionary Housing Ordinance*, is included for the City to research an Inclusionary Housing Ordinance and to determine the appropriateness of an inclusionary housing ordinance.

Short-Term Rentals: Currently, the City does not regulate short-term rentals in the Zoning Code. There are five rentals listed on Airbnb.com as of May 2025; all five of th rentals are for the entire house. There are no rentals limited to a room or suite within a home. Thera re no short-term rentals listed in the City on VRBO.com.

Default Density: As part of the Site Inventory and Analysis in Section V, the City has identified Vacant and Underutilized Sites that are fit for residential development. In accordance with California Government Code Section 65583.2(c)(3)(B), the City has chosen to utilize the "default" density standard of twenty (20) dwelling units per acre.

In a review of the City's development standards, the development of lower-income housing at twenty (20) dwelling units per acre does not create an undue governmental constraint. In addition, the developer can and is encouraged to utilize the Planned Development (P-D) zoning district to relieve certain developmental standards, such as building setbacks, open space requirements, parking standards, etc. As such, utilizing Default Densities is not seen as causing a governmental constraint to the development of affordable housing.

Zoning and Land Use: State and federal housing laws encourage an inclusive living environment, where people of all walks of life have the opportunity to find housing suited to their needs. Persons with disabilities who are unable to live independently in conventional housing can benefit from various types of alternative shelter such as residential care facilities, group homes, or ~~second~~ accessory dwelling units. Riverbank allows such types of shelter in all of its residential zones and some commercial zones. ~~As shown in Appendix D, Table D-1, second units are allowed by right in single-family zones and with a use permit in the C-2 (General Commercial) zone.~~ As noted above, r~~R~~esidential care facilities for up to seven residents are allowed by right in all residential zones and in the C-1 (neighborhood commercial) zone. Rooming and boarding homes are permitted in the R-3, C-1, and C-2 zones.

The City also allows exceptions to the setback and lot coverage requirements, without a variance permit, for improvements and alterations necessary to allow mobility and accessibility of properties for people with disabilities, and other changes necessary to ensure that reasonable accommodations are not constrained by the City's development standards or permitting procedures. The City's height and setback standards are typical of other communities similar to Riverbank.

Building Codes and Development Standards: The City enforces Title 24 of the California Code of Regulations (2022 California Building Code, Effective January 1, 2023), which regulates the access and adaptability of buildings to accommodate persons with disabilities. The City permits existing and new homes to be retrofitted or fitted for features that provide for accessibility and independent living for persons with disabilities. The City does not impose any local amendments to the California Building Code.

Permitting Procedures: The City does not require special building codes or additional levels of review to build, improve, or convert housing for persons with disabilities. Requests for modifications to ensure housing access, such as ramps up to 30 inches in height, do not require a building permit and are processed over the counter. The City uses standard entitlement processes to ensure that facilities are sited and operated in a manner compatible with surrounding land uses. Any person with disabilities or individuals representing such persons can request permits for reasonable accommodations for disabled persons as described above. No additional fees, other than standard building permit fees, are charged by the City to review plans that include accessibility features.

Accessory Dwelling Units: Government Code Section 65852.2(a)(1) allows cities to designate areas within the City where accessory dwelling units (ADUs) may be permitted and to impose development standards addressing issues such as unit size, height, setbacks, parking, lot coverage, landscaping, and architectural review.

The City updated the accessory dwelling unit requirements in the Riverbank Municipal Code (RMC) in 2021 (Ordinance No. 2021-007) to be consistent with California Government Code Sections 65852.150 and 65852.2, which establish regulations for accessory dwelling units.

Section 153.003, *Definitions*, define an accessory dwelling unit as "an attached or detached residential dwelling unit which provides complete independent living facilities for one ore more persons. It shall include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling is situated. An accessory dwelling unit also includes the following: (A) an efficiency until and (B) a manufactured home."

Construction of ADU or JADU (junior accessory dwelling unit) is permitted in all zone districts allowing single-family or multifamily residential uses on lots developed with existing or proposed dwellings. The approval process is ministerial in nature, and the City must approve or deny an application for a building permit to construct an ADU or JADU within 60 days after receiving a complete application. If a complete application for a building permit to construct an ADU or JADU is submitted in connection with an application to construct a new primary dwelling on a lot, the application may not be approved until the application is approved for the new dwelling. The application for the ADU or JADU must be processed ministerially regardless of the approvals required for the primary dwelling. The ordinance sets forth the following development standards for ADUs:

- Location and Size:
  - Attached: An ADU attached to an existing primary dwelling shall not exceed fifty percent (50%) of the total existing or proposed living area of the primary dwelling.
  - Detached: An ADU structurally independent and detached from the existing or proposed primary dwelling shall not exceed 1,200 square feet.
  - JADU: A JADU shall be constructed entirely within an existing or proposed primary dwelling and shall not exceed 500 square feet.
- Setbacks: Minimum interior side and rear setbacks of four feet, street side of 10 feet. No setback required for an existing living area or accessory structure in the same location and to the same dimensions as an existing structure that is converted.
- Height: Not to exceed one story or 16 feet in height, except that an ADU may be constructed above a garage to a maximum height of 35 feet.
- Off-Street Parking: At least one (1) additional off-street parking space shall be provided for the ADU or bedroom, whichever is less, unless: the ADU is located within one-half mile walking distance of public transit; the ADU is located within an architecturally and historically significant historic district; the ADU is part of the existing primary residence or an existing accessory structure; when on-street parking permits are required but not offered to the occupant of the ADU; or when there is a car share vehicle located within one block of the ADU. Parking spaces required for the ADU can be in tandem to the required parking of the main residential structure, may be uncovered, and can be located within the front setback as long as all other yard requirements are met.

When a garage, carport, or covered parking structure is demolished in conjunction with the construction of an ADU or converted to an ADU, those off-street parking spaces are not required to be replaced.

- Utility service and kitchen: ADUs shall have adequate water, sewer, and other utilities and shall have full kitchen facilities.

- Mobile homes and Manufactured Housing: Mobile homes or manufactured housing on permanent foundations shall be permitted as an ADU, only if they are installed on permanent foundations, the mobile home complies with the 1974 National Manufactured Housing Construction and Safety Act, and is ten years or newer. Recreational vehicles, including but not limited to motor homes, travel trailers, tent trailers, fifth wheel trailers, and house boats do not qualify as an ADU.

The City encourages the development of ADUs and provides pre-approved ADU plans. The pre-approved ADU plans were prepared in coordination with Stanislaus County and the cities of Ceres, Modesto, Oakdale, Turlock, and Waterford.
While the Riverbank Municipal Code permits ADUs in accordance with State law, the definition and development standards are not consistent with State law. As such, Program 1.1c, *Accessory Dwelling Units*, requires the City to update the Zoning Code to update the definition for Accessory Dwelling Unit and Junior Accessory Dwelling Unit and the Accessory Dwelling Units Sections (Section 153.325 through 153.330) to be consistent with State law.

7. Availability of Public Facilities

City policies require that community sewer, water, and adequate streets be provided for all new development. ~~The primary public infrastructure/service issue for the City as it looks at accommodating future growth is wastewater collection, treatment, and disposal. The sewer treatment plant has the capacity to serve a population of 50,000. The current population of Riverbank is approximately 24,695. The overall remaining treatment and disposal capacity for wastewater would easily accommodate Riverbank's share of the regional housing needs allocation.~~The City's existing Wastewater Treatment Plant (WWTP) lies just north of the City limits, and across the Stanislaus River in San Joaquin County.

The WWTP consists of a headworks system, aerated treatment ponds, polishing ponds, evaporation/percolation ponds, groundwater monitoring wells, and associating piping and mechanical components. Flow is gravity fed through the system and controlled with system valving/piping.

The maximum permitted treatment capacity as prescribed under Waste Discharge Requirements (WDRs) Order No. 94-100 and the associated monitoring and reporting program, which was adopted by the Central Valley Regional Water Quality Control Board (RWQCB), on April 22, 1994, is 7.9 mgd. While the permitted capacity is 7.9 mgd, the actual capacity of the WWTP is closer to approximately 1.6 mgd, and the plant is nearing capacity.

Currently, the WWTP serves the approximately 2,485-acre City of Riverbank, the population of which in 2021 was approximately 25,243 people. Influent to the WWTP includes flows from industrial discharges and domestic wastewater sources. Domestic wastewater sources include residential, institutional, public facility, and commercial sources. Unit wastewater generation rates range from 55 gallons per capita per day (gpcd) to 63 gpcd. Influent wastewater flows (flows from the plant) from the City are affected by seasonal events. During the wet season, infiltration and flow (I/I) (e.g., rainfall and groundwater seeping through cracks into sewer pipes or through other utility access points) increase influent to the plant; during dry-period flows, occurring predominantly in July, August, and September, flows are lower.

Future growth in the City is managed under the policies of the City's General Plan and under adopted zoning. Future City wastewater flows and loads to the WWTP are expected to increase as a result of infill development and new development within the City's General Plan/Sphere of Influence. Based on population projections prepared by Kjeldsen, Sinnock & Neudeck, Inc. in 2022, the City's population is estimated to reach approximately 36,766 in 2050. Based on this population projection, wastewater flows in 2050 are projected to be required at up to 2.29 mgd.

The City has two (2) future needs at the WWTP. One is to convert (upgrade) the WWTP from a secondary to a tertiary facility. Second, and as part of that conversion, the City intends to increase (expand) the WWTP capacity. Historically, the City has been able to increase capacity at the WWTP by adding aerators, refurbishing ponds, and making other minor adjustments, equipment or operational, at the WWP. Some of these options might still be available, but they are not long-term solutions and would result in modest capacity increases.

To consider and evaluate the future upgrades at the WWTP, the City prepared the Recycled Water Production Study (KSN, January 2022), and the Preliminary Design Report (KSN, December 2022), and the City Council authorized the City Staff and consultant to proceed with the project by action on December 13, 2022.

Long-term improvements to the WWTP to upgrade the level of treatment and expand capacity to accommodate growth projected to occur in the future have bene preliminary analyzed and include headworks facility upgrades to provide reliable grinding and screening capacity; upgrades to the wastewater treatment process to provide oxidation, biological nutrient removal, filtration, and disinfection; and construction of other buildings and structures to support operation at the WWTP.

Conveyance of flows through the secondary process would continue to be gravity fed, similar to existing facilities, with treated water supplied to the tertiary facilities via pumping. These modifications are anticipated to result in both an upgrade and expansion of the plant.

The proposed WWTP upgrades are modular in design and laid out in a fashion to accommodate expansion in the future beyond the 2050 planning horizon. However, the proposed facilities are not sized beyond the capacity needed to treat projected 2.29-mgd flow. With the planned future expansion to the City's WWTP, the capacity can accommodate the City's share of the regional housing need.

Program 3.1i has been added to the Housing Element to monitor the upgrades to the WWTP and to ensure the upgrades occur during the 6th cycle Planning Period.

The City's total water supply capacity is 9,885 gallons per minute (gpm), according to the City's 2020 Urban Water Management Plan. Currently, 6,100 gpm is pumped each day on average. The City's has reviewed its water capacity and distribution system and believes it to be sufficient at this time to serve its future housing construction needs. The total water treatment and delivery capacity would accommodate a future population of approximately 50,000. This capacity can accommodate the City's share of the regional housing need.

The sites identified as a part of the sites inventory outside of current City limits (within the existing SOI) are directly adjacent to the current City boundaries, directly adjacent to areas of the City currently provided with municipal water and sewer service, and as such, would easily be served by minor extensions of such public utilities. Extension of street systems can be easily accommodated to serve such new development in Riverbank~~, as shown on Figure V-2 of Chapter V of this Housing Element, which illustrates the location of available sites~~. The City has elected not to identify any potential sites that are isolated from existing developed areas and where extension of service may be relatively more expensive.

In accordance with Government Code Section 65589.7, immediately following City Council adoption, the city must deliver to all public agencies or private entities that provide water and sewer services to properties within Riverbank a copy of the 2023-2031 Housing Element within thirty (30) days. The City of Riverbank provides water and sewer services to all residents and businesses within the City. As such, Program 3.1e~~f~~ has been added, which requires a copy of the adopted 2023-2031 Housing Element to be provided to the applicable Department(s) within 30-days.

Additionally, the City will establish a written procedure to provide priority water and sewer service to developments with units affordable to lower income households pursuant to Government Code Section 65589.7.

8. Land Use Constraints

Density: The City's Crossroads Specific Plan requires a floor area ratio of 0.35, which contributes to the housing production constraints. The floor area ratio is too restrictive for multi-story development and imposes further restrictions on potential developers. Program 3.1J has been added to adjust density requirements to encourage housing production.

Open Space: All multi-family developments are required to provide at least 50 square feet of a fenced playground or open space per unit with a minimum area of 300 square feet. This requirement may constrain multi-family development, especially on small or infill site where the number of units is less than five (5), by mandating a minimum of 300 square feet of fenced open space regardless of project size. For smaller developments, this fixed threshold can significantly reduce the buildable area and limit design flexibility. Program 3.1J has been added to update the zoning code to 1) require the minimum open space requirement to multiple residential uses of five (5) or more units, 2) to remove the "fenced" playground requirement, and 3) to allow open space areas to count toward the open space requirement (remove the adult-only facility requirement).

C. ENERGY CONSERVATION OPPORTUNITIES

State Housing Element law requires an analysis of the opportunities for energy conservation in residential development. Energy conservation has direct application to affordable housing since higher energy bills result in less money available for rent or mortgage payments.
High energy costs have particularly detrimental effects on low-income households that do not have enough income or cash reserved to absorb costs increases and many times must choose between basic needs such as shelter, food, and energy.

Pacific Gas and Electric (PG&E) provides electrical and gas services for the City of Riverbank. There are a variety of ways for a resident or business to save money through PG&E's rebates program. The rebates that qualify are related to new appliances with the ENERGY STAR certification and vary depending on the appliance.

Publicly operated electrical service is provided by the Modesto Irrigation District.

The Modesto Irrigation District (MID) provides various opportunities for existing and new residential development to obtain energy efficiency rebates for implementing energy conservation measures. For new residential construction, MID offers rebates to homebuilders who incorporate energy efficiency measures into new residential construction, a program called M-Power New Home.

As of January 2024, MID's rebate offer requires the following eligibility:

- Rebates are provided for qualifying product(s) installed in a residential dwelling receiving electricity from MID to customers in good financial standing with MID (subject to MID approval).
- Qualifying products must be installed before submitting your application. It

is the responsibility of the contractor and customer to ensure installation is done in accordance with all applicable city, state, and national standards, codes and ordinances as enforced by the local compliance authority.

- Products can only receive one rebate from MID during its useful life period. Reapplication for a rebate will not be accepted during this period.
- The application and supporting materials should be legible, submitted to MID within 90 days of purchase date.
- Owners of rental units should submit a separate rebate application for each service address.
- For newly constructed homes, qualifying measures, or products purchased and installed after the certificate of occupancy has been issued by the city or county are eligible for rebate under this program.
- Previously owned equipment does not qualify for a MID rebate.

For existing residential development, MID offers energy efficiency rebates. According to http://www.mid.org, the following rebate programs are offered:

- **ENERGY STAR® Qualified Room Air Conditioner:** $50 rebate for replacement of existing room air conditioner with new energy efficient model that meets program requirements.
- **ENERGY STAR® Qualified Washing Machine:** $35 rebate for replacement of existing washing machine with new energy efficient model that meets program requirements.
- **ENERGY STAR® Qualified Heat Pump Water Heater:** $500 rebate for replacement of existing heat pump water heater with new energy efficient model that meets program requirements.
- **ENERGY STAR® Smart Thermostat:** $50 rebate for replacement of existing manual thermostat that meets program requirements**.**
- **Central Air Conditioner / Heat Pump:** $350 to $600 rebate for a central air conditioner and $450 to $700 rebate for a central heat pump.
- **Ductless Mini Split Air Conditioner / Heat Pump:** $250 to $350 rebate for new air conditioner or heat pump that meets the program requirements.
- **Pool Filtration Pump:** $200 rebate on new variable speed pump and motor that meets program requirements.
- **Induction Cooktop / Range:** $100 rebate for replacement cooktop that meets program requirements.
- **Whole House Fan:** $100 rebate on new whole house fan that meets program requirements.
- **Solar Attic/ Gable Fan:** $50 to $100 rebate on new solar attic/ gable fan that meets program requirements.
- **General Improvement Rebates:**
  - Attic Insulation: $0.17 per square foot of replacement of attic insulation to at least R-30 insulation.
  - Radiant Barrier Laminated Sheeting – Roofing: Maximum of $500 rebate for new radiant barrier laminated sheeting for roof.
  - Radiant Barrier – Attic: Maximum of $500 rebate for new radiant barrier in attic.

- **Window Rebates:**
  - Sun Screen: $1.00 per square foot for new sun screen in rooms that receive refrigerated air conditioning.
  - Window Film: $1.00 per square foot for new window film in rooms that receive refrigerated air conditioning.
  - ENERGY STAR® Qualified Replacement Window: $2.00 per square foot for replacement of new Energy Star windows.

All new buildings in California must meet the standards contained in Title 24, Part 6 of the California Code of Regulations (Energy Efficiency Standards for Residential and Nonresidential Buildings). These regulations were established in 1978 and most recently updated in 2022 (effective date of January 1, 2023). Local governments enforce energy efficiency requirements through the building permit process.
All new construction must comply with the standards in effect on the date a building permit application is made.

The California Subdivision Map Act (Government Code Section 66473-66498) allows local governments to provide for solar access as follows:

66475.3. For divisions of land for which a tentative map is required pursuant to Section 66426, the legislative body of a city or county may by ordinance require, as a condition of the approval of the tentative map, the dedication of easements for the purpose of assuring that each parcel or unit in the subdivision for which approval is sought shall have the right to receive sunlight across adjacent parcels or units in the subdivision for which approval is sought for any solar energy system, provided that such ordinance contains all of the following:

(1) Specifies the standards for determining the exact dimensions and locations of such easements.
(2) Specifies any restrictions on vegetation, buildings, and other objects that would obstruct the passage of sunlight through the easement.
(3) Specifies the terms or conditions, if any, under which an easement may be revised or terminated.
(4) Specifies that in establishing such easements consideration shall be given to feasibility, contour, configuration of the parcel to be divided, and cost, and that such easements shall not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or a structure under applicable planning and zoning in force at the time such tentative map is filed.
(5) Specifies that the ordinance is not applicable to condominium projects which consist of the subdivision of airspace in an existing building where no new structures are added.

Assembly Bill No. 2188 (AB 2188) was approved and signed by the Governor on September 21, 2014 and amended state law to require the City to adopt an ordinance that creates an expedited, streamlined permitting process for small residential rooftop solar energy systems. In this regard, the City of Riverbank has adopted an ordinance for expedited permitting procedures and inspections for small residential rooftop solar energy systems and these procedures have since been implemented.

SECTION VIII
HOUSING DEVELOPMENT ELIGIBLE TO CHANGE TO NON-LOW-INCOME UNITS

A. STATE REQUIREMENT

Section 65583 (a)(8) of the Government Code requires analysis of existing assisted rental housing developments that are eligible to change to non-low-income units during the next ten (10) year period due to termination of use restrictions. The required analysis includes project name and location, earliest possible date of conversion to non-low-income use, and the total number of elderly and non-elderly units which could be lost from the local low-income housing stock. The analysis shall also include an estimate of the total cost of producing new replacement housing units and an estimated cost of preserving the assisted housing development.

B. RESULT

Based upon data collected from HCD, the Federal Department of Housing and Urban Development (HUD), the California Tax Credit Allocation Committee, and from the Planning Departments of each jurisdiction, StanCOG identifies **zero** units at-risk to change to non-low-income units within the City of Riverbank. Riverview Gardens, located at 2701 Topeka Street has a total of 42 units and has 41 units rent assisted. The restrictive clause was renewed in 2014 and will continue for 30 years.

The following table provides details on the Affordable Housing in Riverbank. As shown in the table below, zero units are at-risk to change to non-low-income units within the City of Riverbank during the 2023-2031 Housing Element Planning period.

TABLE VIII-1
Affordable Housing
City of Riverbank

Property Name	Address	Rent Assisted Units	Total Units	Expiration Date
Riverview Gardens	2701 Topeka Street	41	42	2068
Willow Point Apartments	6050 Venhaus Way	24	25	2059
Riverbank Family Apartments	3952 Patterson Road	64	65	2064
Riverbank Senior Apartments	3101 Orange Avenue	19	20	2067
Riverbank Central Apartments	6108 Claus Road	71	72	2069
Total:		**148**	**152**	

Source: PolicyMap.com

C. FUNDING PROGRAMS

There are several local, state, and federal funding programs that can be used to assist first-time homebuyers, build affordable housing, and help special needs groups, such as seniors and large households. Because of the high cost of project development and the competition for funding sources, several sources of funds are usually required to construct an affordable housing development. Funds provided may be low-interest loans that need to be repaid, or in some instances, grants are provided that do not require repayment.

Table VII-2 identifies a range of funds that are available from Federal, State, local, and private sources which may be used to develop and rehabilitate affordable housing.

TABLE VIII-2
SUMMARY OF FINANCIAL RESOURCES FOR HOUSING
City of Riverbank
2024

Program Name	Description
FEDERAL PROGRAMS	
Community Development Block Grant (CDBG) Program	Federal block grant program administered and awarded by the State Dept. of Housing and Community Development (HCD) on behalf of HUD through an annual competitive process to cities and counties. Funds may be used for affordable housing acquisition, rehabilitation, construction, homebuyer assistance, community facilities, community services, and infrastructure improvements, among other uses that assist low-income persons.
Emergency Shelter Grants (ESG) Program	Federal block grant program administered and awarded by the State Dept. of HCD on behalf of HUD through an annual competitive process to cities and counties. Funds may be used for homeless services and facilities, including emergency shelter and transitional housing.
Housing for Persons with AIDS (HOPWA) Program	HOPWA makes grants to local communities, States, and non-profit organizations for projects that benefit low-income persons medically diagnosed with HIV/AIDS and their families. HOPWA funding provides housing assistance and related supportive services
Housing Trust Fund (HTF)	Provides grants to states to produce and preserve affordable housing for extremely low- and very low-income households.
HUD Continuum of Care grants	Continuum grants fund outreach and assessment programs and provide transitional and permanent housing for the homeless.
HOME Investment Partnership Act (HOME) Funds	Federal block grant program for affordable housing activities administered and awarded by the State on behalf of HUD through an annual competitive process to cities, counties, and private non-profit housing development agencies.

Neighborhood Stabilization Program (NSP)	Federal block grant administered and awarded by HUD, which was enacted by the United States Housing and Urban Development Department to allow Municipal Agencies to purchase foreclosed or abandoned homes and to rehabilitate, resell, and redevelop these homes to stabilize home neighborhoods.
HUD Section 8 Rental Assistance Program	Provides project-based rental assistance or subsidies in connection with the development of newly constructed or substantially rehabilitated privately owned rental housing financed with any type of construction or permanent financing.
HUD Section 8 Housing Choice Voucher Program	HUD Section 8 Voucher program provides very-low-income tenants with a voucher to be used in rental housing of the tenant's choosing.
HUD Section 202 - Supportive Housing for the Elderly Program	Provides funding for construction, rehabilitation or acquisition of supportive housing for very low-income elderly persons and provides rent subsidies for the projects to help make them affordable.
HUD Section 203(k) - Rehabilitation Mortgage Insurance Program	Provides in the mortgage, funds to rehabilitate and repair single-family housing.
HUD Section 207 - Mortgage Insurance for Manufactured Home Parks Program	Insures mortgage loans to facilitate the construction or substantial rehabilitation of multi-family manufactured home parks.
HUD Section 221(d)(3) and 221(d)(4)	Insures loans for construction or substantial rehabilitation of multi-family rental, cooperative, and Single Room Occupancy (SRO) housing.
HUD Section 811 - Supportive Housing for Persons with Disabilities	Provides funding to nonprofits to develop rental housing for persons with disabilities and provides rent subsidies for the projects to help make them affordable.
HUD Self-help Homeownership Opportunity Program (SHOP)	Provides funds for non-profits to purchase home sites and develop or improve the infrastructure needed for sweat equity affordable homeownership programs.
HUD Shelter Plus Care Program (S+C)	Provides rental assistance and permanent housing for disabled homeless individuals and their families.
HUD Supportive Housing Program (SHP)	Provides grants to develop supportive housing and services that enable homeless people to live independently.
Low-Income Housing Tax Credit (LIHTC) Program	Provides Federal and State income tax credit based on the cost of acquiring, rehabilitating or constructing low-income housing.
Mortgage Credit Certificate (MCC) Program	MCCs can be used by lower-income first-time homebuyers to reduce their federal income tax by a portion of their mortgage interest.
USDA RHS Direct Loan Program and Loan Guarantee Program (Section 502)	Provides low-interest loans to lower-income households. Also guarantees loans made by private sector lenders.
USDA RHS Home Repair Loan and Grant Program (Section 504)	Provides loans and grants for renovation including accessibility improvements for persons with disabilities.

USDA RHS Farm Labor Housing Program (Section 514)	Provides loans for the construction, improvement, or repair of housing for farm laborers.
USDA RHS Rural Rental Housing - Direct Loans (Section 515)	Provides direct loans to developers of affordable rural multi-family rental housing and may be used for new construction or rehabilitation.
USDA RHS Farmworker Housing Grants (Section 516)	Provides grants for farmworker housing.
USDA RHS Multi-Family Housing - Rental Assistance Program (Section 521)	Provides rent subsidies to ensure that elderly, disabled, and low-income residents of multi-family housing complexes financed by RHS can afford rent payments.
USDA RHS Rural Housing Site Loans (Sections 523 and 524)	Provide financing for the purchase and development of affordable housing sites in rural areas for low/moderate-income families.
USDA RHS Housing Preservation Grant Program (Section 533)	Provides grants to nonprofit organizations, local governments, and Native American tribes to renovate existing low-income multi-family rental units.
USDA RHS Rural Rental Housing Guaranteed Loan Program (Section 538)	Provides funding construction of multi-family housing units to be occupied by low-income families.
STATE PROGRAMS	
Affordable Housing and Sustainable Communities Program (AHSC)	Funding for housing, transportation, and land preservation projects that support infill and compact development in proximity to transit to reduce greenhouse gas (GHG) emissions.
Affordable Housing Innovation Program: Golden State Acquisition Fund	Provides quick acquisition financing for the development or preservation of affordable housing. Loans for developers, provided through a nonprofit fund manager.
Affordable Housing Innovation Program: Local Housing Trust Fund Program	To help finance local housing trust funds (LHTFs) dedicated to the creation or preservation of affordable housing
CA COVID-19 Rent Relief Program — for Local Governments, Tribes, and Utilities	ERAP is for local governments within California seeking Emergency Rental Assistance Funds under California Senate Bill (SB) 91 — from California's State Rental Assistance Program and/or a block grant.
CalHome Program	Grants to local public agencies and nonprofit corporations for first-time homebuyer down payment assistance, home rehabilitation, including manufactured homes not on permanent foundations, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance programs, or technical assistance for self-help homeownership.

State Community Development Block Grant Program (CDBG): CD, Native American, and Colonia Allocation	Funds housing activities, public works, community facilities, and public service projects serving lower-income people in small, typically rural communities.
State Community Development Block Grant Program (CDBG): Economic Development Allocation, Over the Counter Development	Economic development through assistance to local businesses, resulting in the creation or retention of jobs for low-income workers in rural communities.
State Community Development Block Grant Program (CDBG): Economic Development Allocation, Enterprise Fund Component	Assists low-income microenterprise owners and create or preserve jobs for low-income and very low-income persons.
State Community Development Block Grant Program (CDBG): Planning and Technical Assistance Grants	Provides funds for small cities and counties for planning and evaluation studies related to any CDBG-eligible activity.
Emergency Solutions Grants Program (ESG)	Grants to address homelessness by providing funding for supportive services, emergency shelter/transitional housing, homelessness prevention assistance, and permanent housing.
Excess Sites Local Government Matching Grants Program (LGMG)	Provides grant funding to support and accelerate selected affordable housing projects on excess state sites.
Foreclosure Intervention Housing Preservation Program	Funds to preserve affordable housing and promote resident or nonprofit organization ownership of residential real property at risk of foreclosure or in the foreclosure process.
HOME American Rescue Plan Program (HOME-ARP)	Assists individuals or households at risk of, or experiencing homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter.
Housing Related Parks Program	Provides financial incentives to Cities and Counties that issue building permits for new housing.
Infill Infrastructure Grant Program	Grant funding for infrastructure improvements that are an integral part of or necessary to facilitate new infill housing in residential and/or mixed-use projects.
Transit-Oriented Development Housing Program	Provides funding to stimulate the production of higher density housing and related infrastructure within proximity to qualifying transit stations that encourage increased public transit ridership and minimizes automobile trips.
Accessibility Grants for Renters	Grants by HCD to local agencies to fund accessibility improvements for disabled renters.

Building Equity and Growth in Neighborhoods (BEGIN)	HCD provides grants to local public agencies that adopt measures to encourage affordable housing. Grant funds must be used for down payment assistance for low and moderate-income homebuyers.
California Homebuyer's Down payment Assistance Program (CHDAP)	Provides deferred down payment assistance loans for first-time moderate-income homebuyers.
California Self-Help Housing Program	Provides grants to organizations to assist low and moderate-income households who build their own homes.
CDLAC Tax-Exempt Housing Revenue Bonds	Local agencies can issue tax-exempt housing revenue bonds to assist developers of multifamily rental housing units, acquire land, and construct new projects or purchase and rehabilitate existing units. Reduce interest rate paid by developers for production of affordable rental housing for low and very low-income households.
CHFA Affordable Housing Partnership Program (AHPP)	Provides below market-rate mortgages to qualified low-income, first-time homebuyers who also receive direct financial assistance from their local government, such as down payment assistance or closing cost assistance.
CHFA Homeownership Program	The program offers single-family low-interest homeownership loans requiring as little as 3% down payment to first-time low- and moderate-income buyers to purchase new or existing housing.
CHFA 100% Loan Program (CHAP)	Provides 100% of the financing needs of eligible first-time homebuyers by providing a below market interest rate first mortgage combined with a 3% "silent second" mortgage to purchase newly constructed or existing (resale) housing.
CHFA Self-Help Builder Assistance Program	Offers an opportunity to households with limited down payment resources to obtain homeownership. The borrower's labor represents the down payment.
CTCAC Tax Credit Program	Through a competitive process, awards tax credits to local agencies or non-profits for the development of affordable rental housing.
Emergency Housing Assistance Program (EHAP)	EHAP provides funds for emergency shelter, transitional housing, and related services for the homeless and those at risk of losing their housing. The funds are distributed to all 58 counties based on a "need" formula derived from factors including population, unemployment, and poverty.
Jobs Housing Balance Incentive Grant Program	Provides grants to local governments that approve increased housing production.
Joe Serna, Jr. Farmworker Housing Grant Program: Single Family	Finances new construction, rehabilitation, and acquisition of owner-occupied housing units for agricultural workers, with a priority for lower-income households. – Homeowner Grants
Joe Serna, Jr. Farmworker Housing Grant Program: Rental	Finances new construction, rehabilitation, and acquisition of owner-occupied housing units for agricultural workers, with a priority for lower-income households. – Rental new construction or rehabilitation grants and loans
Local Housing Trust Fund	Matching grant funds to local and regional housing trust funds dedicated to the creation, rehabilitation, or preservation of affordable housing, transitional housing, and emergency shelters.

Mobile home Park Resident Ownership Program (MPROP)	Finance the preservation of affordable mobile home parks by conversion to ownership or control by resident organizations, nonprofit housing sponsors, or local public agencies.
Multifamily Housing Program: General Component (MHP-General)	Provides low-interest loans to developers of affordable rental housing.
Multifamily Housing Program: Supportive Housing Component (MHP-SH)	Provides low-interest loans to developers of permanent affordable rental housing developments that contain supportive housing units.
Multifamily Housing Program: Homeless Youth Component (MHP-HY)	Provides low-interest loans to developers of affordable rental housing developments that contain units for homeless youth (HY).
No Place Like Home Program	Funds the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or at risk of chronic homelessness.
Preservation Interim Repositioning Program	Provides a short-term loan to an organization for preservation of "at-risk" subsidized developments.
Preservation Opportunity Program	Provides supplemental financing for "at-risk" subsidized rental developments receiving bond financing from CalHFA.
Predevelopment Loan Program (PDLP)	Provides predevelopment capital to finance the start of low-income housing projects.
Proposition 84 Office of Migrant Services	Uses general obligation bonds to fund new construction or conversion and rehabilitation of existing facilities for migrant housing.
SB 2 Planning Grants	Funding and technical assistance to local governments in California to help cities and counties prepare, adopt, and implement plans and process improvements that streamline housing approvals and accelerate housing production.
School Facility Fee Down payment Assistance Program (CHFA)	Provides down payment assistance grants for low and moderate-income homebuyers of newly constructed to cover school impact fees
Transitional Age Youth (TAY) Program	Funds to help young adults 18-24 years secure and maintain housing, with priority given to those formerly in the foster care or probation systems.
Veterans Housing and Homelessness Prevention Program (VHHP)	Long-term loans for the acquisition, construction, rehabilitation, and preservation of affordable multifamily housing for veterans and their families to allow veterans to access and maintain housing stability.
LOCAL PROGRAMS	
Single-Family Mortgage Revenue Bonds	Bonds may be issued and used to fund programs for construction and rehabilitation of affordable single-family housing.
Multi-Family Mortgage Revenue Bonds	Bonds may be issued and used to fund programs for construction and rehabilitation of affordable multi-family housing.
PRIVATE RESOURCES	

Federal Home Loan Bank Affordable Housing Program	Provides grants or subsidized interest rate loans for purchase, construction, and/or rehabilitation of owner-occupied housing by or lower- and moderate-income households and/or to finance the purchase, construction, or rehabilitation of rental housing.
Federal National Mortgage Association (Fannie Mae) Programs	Provides low down payment mortgage to help first-time buyers purchase a home.
Federal Home Loan Mortgage Corporation (Freddie Mac) Affordable Gold Program	Provides mortgages requiring as little as 3% down payment.
California Community Reinvestment Corporation (CCRC)	Provides long-term mortgage and bond financing for new construction, acquisition, and rehabilitation as well as direct equity investment funds to acquire housing at risk of going to market-rate rents.
Low-Income Housing Fund	Provides financing for low-income housing at affordable rates and terms.

Source: HUD, HCD Financial Assistance Directory Program (January 2024), LISC, USDA, and CCRC.

SECTION IX
Evaluation of Previous Housing Element

This section evaluates the goals, objectives, and implementation strategies of the 2015 - 2023 Housing Element. California Government Code Section 65588(a) requires each jurisdiction to evaluate the effectiveness of the existing Housing Element, the appropriateness of the goals, objectives, and policies, and the progress in implementing the programs over the planning period of the Housing Element.

A. EFFECTIVENESS OF PROGRAMS

The City of Riverbank has almost met its total 5th Cycle Planning Period housing unit production goal for the Above Moderate-Income category. Housing production has remained steady through the 5th Cycle Planning Period for the Above Moderate-Income category though the City did not meet the housing production goals for the Lower-Income category.

B. ABILITY TO MEET QUANTIFIED OBJECTIVES

The City of Riverbank met most of its objectives as detailed in subsection four below; however, not all objectives were met. Developer response to the opportunity to build at a high, multi-family density has resulted in continued production of single-family homes. Other hindrances included limited staff to focus on proactive approaches and a lack of public support.

C. APPROPRIATENESS OF GOALS

The 2015-2023 Housing Element was based on a previously successful philosophical approach to providing housing for needy families. Sufficient lands for housing opportunities were believed to be available, governmental restraints were reduced, and cooperative efforts were encouraged among governmental agencies (local, state, and federal) for profit and non-profit housing advocacy.

D. HOUSING UNIT ACCOMPLISHMENTS 2015-2023

During the 2015-2023 Housing Element cycle, the city added 509 housing units. However, this did not meet the 2015-2023 total projected need of 1,280 units. Moreover, the City did not satisfy the allocations for each income group. During the 2015-2023 period, the City had a trend of moderate- and above moderate- income homes being built. Units built in the above moderate category exceeded RHNA allocation. Table IX-1, Housing Unit Accomplishments 2015-2023, summarizes the City's accomplishments.

TABLE IX-1
Housing Unit Accomplishments, 2015 - 2023

Year	EXTREMELY LOW	VERY LOW	LOW	MODERATE	ABOVE MODERATE	Total
RHNA (2015-2023)	***161***	***161***	***206***	***217***	***536***	***1,280***
2015					52	52
2016		33	38		71	71
2017					13	13
2018					40	40
2019					18	18
2020					25	25
2021					47	47
2022					98	98
2023				5	145	145
TOTAL PERMITS (2015-2023)	0	33	38	5	433	509
Difference	**(161)**	**(128)**	**(168)**	**(212)**	**(103)**	**(771)**
SOURCE: City of Riverbank Building Department, City of Riverbank Housing Department						

E. EVALUATION OF PREVIOUS POLICIES AND PROGRAMS

Several of the policies and programs in the 2015-2023 Housing Element were successful in meeting their objectives. Table IX-2, Housing Policies and Programs Evaluation, provides a detailed review of the City's 2015-2023 Housing Element programs, followed by a statement of whether the policies and/or programs will be deleted, continued, and/or continued and modified as part of the 2023-2031 Housing Element.

During the 5th Cycle, the City utilized various tools to facilitate affordable housing development and addressing the housing needs of its special needs as well as extremely low-, very low-, low-, and moderate-income households. Several of the 2015-2023 Housing Element programs successfully assisted residents with special housing needs. Recent successes include:

- Through Program 1.1b, the City successfully processed and approved the Crossroads West Specific Plan and the Specific Plan area was formally annexed into the City in 2019 by the Stanislaus Local Agency Formation Commission (LAFCo). The Crossroads West Specific Plan includes a variety of land uses, including mixed-use and high density residential.

- In 2017, the City Council approved a General Plan Amendment and Rezone of APN: 075-030-001 from R-1 to R-3, successfully meeting the unaccommodated need of the City's 4th and 5th Cycle Housing Elements as a site for lower-income RHNA.

- Through Program 2.1h, the City successfully amended the City's Zoning Ordinance in 2017 to comply with Health and Safety Code related to Employee Housing/Farmworker Housing.

- Through Program 3.1d, the City successfully amended the City's Zoning Ordinance to reduce the off-street parking requirement for multifamily uses in the R-2 and R-3 Zoning Districts.

- In 2015, the City amended Section 150.30, *System Development Fees* of the City's Municipal Code to provide provisions for the deferral of system development fees which implemented Program 3.1e.

The City continues to work with the Stanislaus Regional Housing Authority by providing housing information when requested and managing the Riverbank Housing Authority. The Stanislaus Regional Housing Authority operates several affordable housing programs in addition to Public Housing, including year-round Farm Labor Housing, Seasonal Migrant Farm Worker Housing, and several smaller affordable housing properties including units funded under the Neighborhood Stabilization Program and the Housing Choice Voucher Program.

The City participates on an annual basis in the review of housing needs, including lower-income housing, special populations, and homeless needs, through the Annual Action Plan and Continuum of Care project. Each year, the City reviews the Countywide programs and priorities, including activities and funds allocated to address regional lower income housing, special populations, and homeless needs. The City, in coordination with Stanislaus County and the State Department of Housing and Community Development, manages the Community Development Block Grant (CDBG), HOME Investment Partnership Program and CALHOME Programs. These programs are utilized towards the City's Housing Rehabilitation Program and First Time Homebuyer Program.

Cumulatively, the 5th Cycle Housing Element resulted in assistance in special housing, including:

- **Seniors:** In 2023, the City's Planning Commission approved the Pocket Avenue Senior Apartments Project, located at 3318 Pocket Avenue (APN: 075-090-063).

- **Large Families:** Development during the 5th Cycle included a variety of units suitable for large families. Market rate single family for-sale homes included 3- and 4-bedroom units located in the City.

- **Persons with a Disability:** The City did not receive any requests for reasonable accommodations during the 5th Cycle.

- **Farmworkers:** No new housing or assistance was provided specific to farmworker household.

- **Female Heads of Household with Children Present:** While housing was constructed in proximity to services, including day care, schools, and employment opportunities that may benefit female heads of household with children, the City did not track units that specifically address this population.

- **Homeless:** During the 5th Cycle, the City continued to have a very small homeless population. The City works through its Police Department to connect homeless persons to housing and resources, which continued to assist unsheltered persons in the City of Riverbank.

While the majority of goals, policies, and programs included in the 2015-2023 Housing Element continue to be appropriate to address the City's housing needs, the 2023 – 2031 Housing Goals and Policies will be updated to provide clearer guidance and timelines, to remove redundancies as many programs are repetitive, to provide more specific direction and measures to encourage affordable and special needs housing, and to address new requirements to State law. The intent of these programs is to address identified specific housing needs, constraints, or other concerns identified as part of this update. The 2023 – 2031 Housing Goals and Policies include a complete set of new and/or revised programs to address the City's housing needs for the 6th Cycle Planning Period.

TABLE IX-2
Housing Policies and Programs Evaluation

Policies and Programs	Accomplishments and Discussion
GOAL 1: IDENTIFY ADEQUATE SITES TO PROVIDE FOR A SUFFICIENT NUMBER OF DWELLING UNITS TO MEET THE CITY'S REGIONAL HOUSING NEEDS.	
Policy 1.1: Ensure land use and zoning procedures accommodating affordable housing.	Refer to discussion for Program 1.1a through 1.1c.
Program 1.1a: The City shall designate sufficient land at various densities to allow for the construction of sufficient housing to meet its legally adopted HCD Regional Housing Need Allocation (RHNA) between 2014 and 2023. The City shall review, as needed, the amount of land designated for various residential uses in conjunction with the amount of and types of housing produced in the previous years to determine if any changes in the General Plan and Zoning Ordinance may be needed to meet the City's housing needs. A review of the supply of vacant land and development patterns over the preceding year will be incorporated into each annual evaluation of the City's implementation of the Housing Element programs. Since some of the land needed to meet the City's housing needs between 2014 and 2023 is outside the present City limits and Sphere of Influence, the City will have to amend its Sphere of Influence and annex this land before it can be developed. The City shall prezone enough land outside the current city limits to accommodate the remaining housing need. The City shall inform local developers and affected landowners of the prezoning action through a public outreach effort (i.e., direct mailings, website postings, etc.). The outreach effort should also seek to encourage developer interest in annexation of prezoned land by describing development characteristics. Responsibility: Development Services Department Timeframe: 2014-2023	Implemented and ongoing. The City has maintained the inventory of residential uses throughout the 5th Cycle. The City's Municipal Service Review (MSR) and Sphere of Influence (SOI) Plan was updated and adopted by the Stanislaus Local Agency Formation Commission (LAFCo) on July 27, 2016. Additionally, the Crossroads West Specific Plan (CWSP) was approved by the City Council on March 19, 2019, including the Pre-Zone of the Annexation Area. The Annexation of the CWSP area was approved by LAFCo in 2019. **Status:** This program has been effective but will be modified to include measures to comply with Government Code Section 65863 (No Net Loss Law), to regularly update and refigure the City's remaining inventory of housing sites, and to ensure adequate sites are available throughout the 6th Cycle.

Program 1.1b: In conjunction with Program 1.1a, the City shall maintain its vacant site inventory by facilitating the development of the Crossroads West Specific Plan, and designate therein sufficient sites to accommodate the dwelling units identified in Table V-5, and specifically, those sites designated for higher density development in order to meet the regional housing needs for lower income. As of March 2015, the Crossroads West Specific Plan area is anticipated to be annexed into the City of Riverbank by 2017. Upon annexation, the City shall permit the development of sites designated for higher density development in accordance with Section 65583.2(h) and (i) of the Government Code, including permitting multi-family housing without discretionary review, or beyond what is typically required by the City. The City will also consider allowing additional density bonuses within the Crossroads West Specific Plan for affordable housing development projects that commit to providing Extremely Low-, Very Low-, and Low-Income Housing. If the Crossroads West Specific Plan is not annexed by 2017, the City will take the following actions to identify and rezone, if necessary, higher density residential sites of equivalent capacity within 6-months to maintain a sufficient sites inventory to meet the City's Regional Housing Needs Allocation. Responsibility: Development Services Department, Planning Commission, City Council Timeframe: By End of Year 2017	Implemented and ongoing. The City continues to maintain its vacant site inventory. As noted in the review of Program 1.1b above, the Crossroads West Specific Plan (CWSP) was approved by the City Council and annexed into the City by LAFCo in 2019. **Status:** This program has been effective to monitor the processing of the CWSP. This program will be modified to continue to monitor the development of the CSWP and to continue allow multi-family housing development projects to be reviewed and approved without discretionary review consistent with Government Code Section 65583.2(h) and (i).
Program 1.1c: To meet the Unaccommodated Need from the 4th Cycle identified in the Program 1.1a and AB1233 Analysis located in Section VIII, the City will rezone the site(s) listed in Table VIII-7 and adopt a general plan amendment (if necessary). The site(s) will meet the following criteria: • Can meet a minimum of 16 units; • Can meet a minimum density of 20 dwelling units per acre; • Rezone to a district that can permit residential uses only (by-right)	**Status:** This program is complete. The City Council adopted Resolution No. 2017-078 and Ordinance No. 2017-011 on October 17, 2017, to approve a General Plan Amendment and Rezone ~~the~~to the Property listed in Table VIII-7 of the 2015-2023 Housing Element (APN: 075-030-001) from R-1 to R-3. Program 1.1d of this Housing Element requires the City to update the Zoning Code to address by-right approval requirements for vacant site that were identified in the City's 4th and 5th cycle

Failure to rezone the site(s) to address the Unaccommodated Need from the 4th Cycle by the timeframe will result in Housing Element non-compliance. Responsibility: Development Services Department Timeframe: No later than December 31, 2016	Housing Elements as sites meeting the lower-income RHNA, nonvacant sites that were identified in the 5th cycle Housing Element as sites for lower-income RHNA, and the rezoning of sites past the statutory deadline of the Housing Element. Although this program was implemented in that the site was rezoned from R-1 to R-3, the action did not address by-right approval requirements. Program 1.1d will implement by-right approval requirements for pursuant to Government Code Section 65583.2. This program will be removed.
Policy 1.2: Maintain an inventory of vacant and underutilized residential lands.	Refer to discussion for Programs 1.2a through 1.2b.
Program 1.2a: Track changes in land availability and accomplishments in multi-family development to determine if further rezoning is necessary to better facilitate high-density developments. Responsibility: Development Services Department Timeframe: Ongoing and Annually through the General Plan Housing Element Annual Progress Report	Through the Annual General Plan Progress Reports, City staff has continuously monitored the availability of land suitable for residential development, including multi-family residential development. Therefore, this program has been successful and will be continued as part of the 2015-2031 Housing Element. **Status:** This program has been successful and will be continued for the 2023-2031 Housing Element Update.
Program 1.2b: Update Geographical Information Systems (GIS) as changes to the land inventory occur. Provide this information to those interested in infill projects through updated layers viewable from the internet. Responsibility: Development Services Department Timeframe: Ongoing	The City's Geographical Information Systems (GIS) continues to be updated as Zoning and General Plan changes are adopted by City Council. The GIS is up-to-date as of July 2024 though not yet available to the public for use. The City intends to continue to update the GIS system so that it is up-to-date and available for public consumption. **Status:** This program will be modified to include additional measures and timing to ensure that the GIS is updated and is available for public use and consumption.
GOAL 2: ENCOURAGE AND ASSIST IN THE DEVELOPMENT OF ADEQUATE HOUSING TO MEET THE NEEDS OF EXTREMELY LOW-, LOW- AND VERY LOW-INCOME HOUSEHOLDS.	
Policy 2.1: Implement a proactive approach to encourage and gain support for multi-family	Refer to the discussion below for Programs 2.1a through 2.1g.

developments.	
Program 2.1a: Seek assistance from non-profit developers, including Self-Help Enterprises and Habitat for Humanity to develop homes for lower-income families. The City will meet with non-profit developers to discuss available sites for affordable housing projects, potential funding sources, and actions the City can take to assist housing providers in obtaining funding. Responsibility: Housing & Economic Development Department Timeframe: Meet with non-profit developers annually thereafter to discuss affordable housing development opportunities, available funding, and the City's support of funding requests.	City staff has and continues to maintain communications with non-profit developers such as Self-Help Enterprises and Habitat for Humanity. As noted previously in this Housing Element, the City has assisted in the development of three (3) affordable housing projects; the Riverbank Family Apartments, Riverbank Senior Apartments, and Riverbank Central Apartments. City staff assisted the developer, Pacific West Communities, in identifying a site suitable for affordable residential development. The City also provides assistance through two (2) CDBG programs: the Homebuyers Downpayment Assistance Program and the Housing Rehabilitation Program. The City provided seventeen loans to 1st Time Homebuyers between 2015 and 2023. **Status:** This program has been successful, and the City has met with non-profit developers as needed to discuss development opportunities in the City. This Program will be continued as part of the 2023-2031 Housing Element.
Program 2.1b: Continue to assist developers of extremely low-, low- and very-low-income housing in the grant preparation process to help fund their developments. Funding will be prioritized for the development of housing affordable to extremely low-income households. The City assists developers by expediting review and approval of development applications to meet funding deadlines and providing information needed to support funding requests. Responsibility: Community Development and Housing & Economic Development Departments Timeframe: Bi-Annually and as project applications are received.	During the 2015-2023 planning period, the City approved and assisted in the development of one (1) affordable housing project: known as Riverbank Central Apartments. The Riverbank Central Apartments consists of 71 multi-family residential units and accommodate households that qualify as lower income categories. The Riverbank Central Apartments was approved by the City in 2015 and subsequently constructed in 2016. **Status:** As development interests increase, and the City receives interest and/or formal development applications for residential projects accommodating lower income households, City staff has, and continues to, assist where feasible through expediting the application process, deferring fees, and assist in obtaining grant funding. Therefore, this Program will be continued as part of the 2023-2031 Housing Element.

Program 2.1c: Encourage developers to include second dwelling units in new subdivisions as well as a variety of higher density options. The City encourages developers to include second units by permitting such units without requiring additional lot area and allowing up to 50 percent lot coverage. The City permits such units by right in single-family subdivisions according to the requirements of State law. Responsibility: Community Development Department Timeframe: Ongoing	The City continues to encourage the development of accessory dwelling units with the development of new subdivisions as well as a variety of higher density options. The City developed a Tiny House Ordinance, which allowed the development of Tiny House Villages. The Tiny House Village Ordinance was adopted in January 2023 and the first Tiny House Village, the Lucky House Tiny House Village Project was approved by the Planning Commission in June 2024. **Status:** This program will be continued as part of the 2023-2031 Housing Element but "second dwelling units" will be modified to "accessory dwelling units" and to reference updated State Law.
Program 2.1d: Continue to distribute information on second units at the permit counter and post information on the City's website. Responsibility: Community Development Department Timeframe: Ongoing	The City received, in coordination with Stanislaus County and the other Cities in the County, a SB2 Grant to develop fully engineered accessory dwelling unit plans (8 sets of plans). The fully engineered accessory dwelling unit plans are available for use by Riverbank residents and is located on the City's website for download. **Status:** This program has been successful as the City participated in a program to develop fully engineered accessory dwelling unit plans. This program will be modified to include preparation of promotional materials for the development of accessory dwelling units as well as to ensure updates to the fully engineered accessory dwelling unit plans to be consistent with updated Building Codes through the 2023-2031 Planning Period.
Program 2.1e: Assist in the development of housing for farmworkers. Actions will include assistance with site identification and support of applications for funding. The City shall provide technical assistance when needed and continue to conduct pre-application conferences and meet with farm worker housing developers on an ongoing basis. Actions include: • Post information on the Development	While the City continues to be available to support the development of housing for farmworkers, the City has not had any requests for assistance with securing funding for farmworker housing during the 5th Cycle. No projects were identified, and no grant applications were submitted during the 5th Cycle. If applications for such developments are submitted during the 6th Cycle, the City will assist applicant(s) in preparing and submitting

Services website within 1-year of Housing Element adoption. Information includes a site inventory of available land (Program 2.1f), housing resources and grant information. • Contact farmworker housing developers to determine interest and identify constraints to farmworker housing development within the City. Responsibility: Economic Development and Housing Department Timeframe: Ongoing; Post information on Development Services website within 1-year of Housing Element adoption; Identify and list Farmworker housing developers by December 2017.	grant applications for funding. **Status:** This Program is appropriate but has not been effective due to the lack of developer interest. This program will be modified to provide more aggressive outreach to identify potential programs, to include additional measures to assist interested developers and non-profits.
Program 2.1f: The City will work with the agricultural community, housing providers and agricultural groups to develop and build year-round and seasonal agricultural worker housing. This will require an analysis of prime agricultural areas in the City to identify suitable locations for at least 20 units of farmworker housing. Information gathered from this analysis shall be provided, in conjunction with Program 2.1e, to agricultural and affordable housing developers in a manner conducive to their use for developing the actual units. In addition, the City shall invite developers and local farmworker organizations to be involved in the Housing Element update and other housing related activities. Responsibility: Development Services and Housing Development Timing: Ongoing, Initiate analysis of prime agricultural areas in the City within 1-year of Housing Element adoption.	This Program is partially implemented and ongoing. While the City continues to monitor sites that are classified Prime Farmland through the Department of Conservation Farmland Mapping and Monitoring Program, the City
Program 2.1g: The City will update the uses permitted in the R-1 and R-2 Zone to include Transitional and Supportive Housing as a permitted use. In addition, the City shall amend the Uses Permitted with a Use Permit in the C-1, C-2, and C-M Zone to remove Transitional and Supportive Housing as a Permitted Use with a Use Permit. The C-1, C-2, and C-M Zone	This Program was not completed in the 5th Cycle Planning Period. **Status:** This Program will be modified for the 2023-2031 Housing Element to include a list of amendments necessary to implement the Program and to update timing.

do not permit residential uses and Transitional and Supportive Housing, per State Law, shall be permitted by-right and require no discretionary review. Responsibility: Development Services Department Timeframe: by June 2016, adopt updated permitted uses.	
Program 2.1h: The City shall amend its Zoning Ordinance to comply with Health and Safety Act Sections 17021.5 and 17021.6 and permit Employee Housing/Farmworker Housing in the R-1 Zone. The amendment shall include the following: • Amend Definitions (Section 153.003) to include Employee Housing • Amend the Single-Family Residential District R-1 Zone to include Employee Housing for no more than 6 workers as a permitted used (Section 153.031) • Amend the Single Family Residential District R-1 Zone to include Employee Housing with no more than 12 units or 36 beds as a permitted use (Section 153.031). Responsibility: Development Services Department Timeframe: By June 2016, adopted updated permitted uses.	This Program is complete. The Amendments to Sections 153.003 and 153.031 were completed in 2017 with the adoption of Ordinance No. 2017-010. **Status:** This program has been implemented and is no longer needed.
Program 2.1i: The City shall refer residents to the Valley Mountain Regional Center for housing and services available for persons with developmental disabilities. Provide information on services on the City's website. As available, the City will pursue State and federal monies for direct support of housing construction and rehabilitation specifically targeted for housing for persons with developmental disabilities. Responsibility: Development Services Department and Housing and Economic Development Department Timeframe: 2014-2023	As needed, the City refers residents to the Valley Mountain Regional Center. Informational handouts are available at City Hall for residents to obtain information about the Valley Mountain Regional Center. The City has not yet pursued State and federal monies for direct support of housing construction and rehabilitation specifically targeted for housing for persons with developmental disabilities. **Status:** This program has been effective and will be kept in the Housing Element to ensure ongoing planning to accommodate the developmentally disabled population.

Program 2.1j: The City shall encourage housing development within the General Plan Infill Opportunity Area and specifically, sites designated Mixed Use. Housing Development shall include housing for extremely low-, very-low-, and low-income group. Strategies to achieve new and infill housing include: • Allow sites to be developed with stand-alone residential uses and densities of at least 20 dwelling units per acre, provided the development proposal includes an affordable housing component; • In conjunction with Program 1.2a, the City shall keep an up-to-date inventory of vacant and underutilized sites within the Infill Opportunity Area; and • Encourage affordable housing developers, such as Habitat for Humanity, to locate affordable housing projects within the Infill Opportunity Area. Responsibility: Development Services Department Timeframe: 2014-2023	The City continues to encourage and provide opportunities for development within the Infill Opportunity Area. In 2022, the City updated its profile on oppsites.com, which features areas of the City that are undeveloped or underutilized, some of which are within the Infill Opportunity Area. **Status:** This program has been successful and will be continued to the 2023-2031 Housing Element.
Program 2.1k: Regional cooperation with homeless needs. The City shall participate in the Stanislaus County Housing and Support Service Collaborative (SCHSCC) and the Continuum of Care to help address homeless needs in Riverbank and Stanislaus County. Actions include: • Coordinate with the Stanislaus County Housing Authority on the Continuum of Care; • Have a point of contact in Riverbank within the Development and/or Housing Department Responsibility: Development Services and Housing Department Timeframe: Ongoing, coordinate with the Stanislaus County Housing Authority within 1 year of Housing Element adoption.	The City continues and is a participant of the Stanislaus County Housing and Support Services Collaborative/Community System of Care (StanCSOC). In 2017, the Stanislaus County Housing and Supportive Services Collaborative/Continuum of Care and the Homelessness Action Council merged efforts, which is led by a 25-member Council representing all major sectors of the Community. **Status:** This program has been successful and will be modified to update the appropriate name (Community System of Care) for the organization.

Policy 2.2: Encourage revitalization and expansion of residential development and opportunities within the City's Downtown Specific Plan area.	Refer to discussion below for Program 2.2a through 2.2c.
Program 2.2a: To ensure that there is no net loss of residential development potential for the vacant sites designated Downtown Core, Mixed Use Neighborhood, and Downtown Neighborhood, as identified in the Downtown Specific Plan, the City shall encourage redevelopment in the Downtown area that results in a two to one replacement of any existing housing units displaced by redevelopment projects in the Downtown area. Responsibility: Development Services Department Timeframe 2014-2023 Planning Period	The City continues to work with developers seeking to redevelop properties within the Downtown Specific Plan and as development applications are received, will encourage replacement of existing residential units at a two to one ratio. **Status:** This program has been successful but will be modified to be consistent with the No Net Loss Law (Government Code Section 65863).
Program 2.2b: In conjunction with Program 2.2a, the City shall coordinate with Developers and Non-Profit Housing Providers (i.e., Housing Authority of Stanislaus, Stanislaus Habitat for Humanity, etc.) on the implementation of the Downtown Specific Plan. The City shall consider joint venture partnerships with developers and/or property owners to help facilitate land assembly, option agreements, and outright land purchase for projects consisting of attached single-family and multi-family residential for extremely low, very low, and low-income households within the Downtown Specific Plan area. Responsibility: Development Services Department Timeframe: Annually	The City continues to provide information on the Downtown Specific Plan to developers, including Non-Profit Housing Providers as necessary. The City did not enter into a joint venture partnership with a developer in the 5th Cycle. **Status:** This Program will be continued in the 2023-2031 Housing Element.
Program 2.2c: The City shall encourage the development of new housing of upper stories and mixed-use buildings in the Downtown Core area of the Downtown Specific Plan. Where feasible, City staff shall assist Property Owners and/or Developers in identifying sites suitable for upper story residential development,	The City provides housing information as requested to interested parties and addresses inquiries regarding the housing process. **Status:** This program has been effective and overlaps with several other programs. This Program will be merged into applicable

identifying Grant funding opportunities, and expedite permit processing through Community Development Department. Responsibility: Development Services Department Timeframe: 2014-2023 Planning Period.	programs in the Housing Element addressing availability of information regarding housing resources, the City's planning process, and Grant funding opportunities.
GOAL 3: REDUCE OR REMOVE GOVERNMENT CONSTRAINTS.	
Policy 3.1 Promote efficient and creative alternatives to help reduce government constraints.	Refer to discussion below, for Programs 3.1a through 3.1g.
Program 3.1a: Continue to promote the use of Planned Development zones for developers who wish to deviate from setback, parking, or other standards which may limit their ability to develop at a desired density. Responsibility: Community Development Department Timeframe: Ongoing	This program has been successful for the 5th Cycle Planning Period. The City processed five (5) Planned Development Rezones between 2018 and 2022. The Planned Development Rezones were for residential development. **Status:** This program remains relevant and will be modified to include additional objectives to provide additional opportunities for the use of Planned Development zones.
Program 3.1b: The City will waive fees for General Plan Amendments intended solely to increase residential designations from low-to-medium density to medium-to-high density residential. The City will apply the fee waiver at the time of submittal of a complete application. The City will also defer fees for developments with units affordable to lower-income households until the time of first inspection or as established in a development agreement between the City and the project applicant. The City will promote its fee waiver program through distribution of a brochure at the permit counter, posting of information on the City's website, and distribution of information to the local building industry association. Responsibility: Community Development Department Timeframe: Ongoing	The City approved six (6) General Plan Amendments in the 5th Cycle Planning Period. None of the General Plan Amendments processed during the 5th Cycle Planning Period increased density of a property with the exception of the Crossroads West Specific Plan, which includes land designated as High Density Residential. The Fee Waiver and/or Deferral has not been utilized by Developers during the 5th Cycle. **Status:** This program will be modified to encourage developers to utilize the City's Fee Deferral Program to promote housing development.
Program 3.1c: Continue to utilize computer software to help fast-track building permits, saving both developer and staff time.	This Program has been successful. The City was awarded a Grant of $150,000 from the Local Early Action Planning (LEAP) Grant in

Responsibility: Community Development Department Timeframe: Ongoing	2020 to update the City's permit processing procedures and software to facilitate development of housing. The update will include a new electronic system for submitting Building Permits, Plan Review, Fees, Building Permit Issuance, Inspections, and Certificate of Occupancy issuance. **Status:** This Program will be modified to ensure that the new permit software is implemented.
Program 3.1d: As parking requirements are a common constraint throughout the State of California, the City shall review and amend to reduce the City's parking standards (inclusive of guest parking) for multifamily uses in the R-2 and R-3 zones as follows: • Zero to one (1) bedroom: one onsite parking space; • Two to three bedrooms: one and a half onsite parking spaces; and • Four or more bedrooms: two- and one-half onsite parking spaces. The City shall provide this information at the planning counter, on the City's website and in other public spaces to increase awareness. In addition, the City will review the Zoning Code annually to determine if any amendments need to be made to the Parking standards for multi-family and special housing, to reduce constraints to multi-family housing development. Responsibility: Development Services Department Timeframe: Review Zoning Code Parking Standards annually and make information available to public by Spring of 2016	This Program is complete. Section 153.184, *Off-Street Parking Requirements* off-street parking for two-family dwelling, duplex, or multiple dwelling as described in Program 3.1d. **Status:** This Program has been implemented and is no longer needed. However, the Program will be modified to require the City to conduct annual review of residential development standards, including off-street parking, to determine if any standards need to be amended for for multifamily dwelling and special housing to reduce constraints to housing development.
Program 3.1e: Amend Section 150.30: System Development Fees of the Riverbank Municipal Code to provide provisions for the Deferral of System Development Fees. Deferral of Fees are to be approved by the City Council and shall require a deposit, payment of an administrative expense, and payment of a	This Program is complete. Amendments to Section 150.30, *System Development Fees* of the Riverbank Municipal Code were completed in 2015 with the adoption of Ordinance No. 2015-016. **Status:** This Program has been implemented

reasonable rate of interest for the portion of the fee which is deferred. Responsibility: Development Services Department Timeframe: Adopt Zoning Ordinance amendment by Spring of 2016	and is no longer needed.
Program 3.1f: In accordance with Government Code Section 65589.7, immediately following City Council adoption, the city must deliver to all public agencies or private entities that provide water and sewer services to properties within Riverbank a copy of the 2014-2023 Housing Element. The City of Riverbank provides water and sewer services to all residents and businesses within the City. As such, a copy of the adopted 2014-2023 Housing Element will be provided to the applicable Department(s) within 30-days. The City also will establish a written procedure by the end of 2017 pursuant to Government Code Section 65589.7 to provide priority water and sewer service to development with units affordable to lower income households. Responsibility: Development Services Department Timeframe: Within 30 days of adoption of the Housing Element, prepare written procedures by the end of 2017.	This Program has not been implemented. The City has not experienced a shortage of water or sewer capacity, and availability of water and sewer service has not been a constraint on new development, including housing affordable to lower-income households. However, to comply with State law, the City is preparing written policies and procedures to ensure that housing affordable to lower income households, including extremely low, very low-, and low-income housing, is granted priority when seeking water and sewer commitments and connections. **Status:** This program has not been implemented but is necessary and will be kept in the 2023-2031 Housing Element to ensure completion in the 6th Cycle.
Program 3.1g: Affordable housing developers often face constraints in developing affordable housing projects. One way the City can assist such developers is by providing fast-track/priority processing for low-income and special needs housing projects. This service can encourage affordable housing development by allowing developers to go through the approval and permitting process quicker keeping costs down and units affordable. It is important that following the construction of the project that units are monitored to ensure that subsequent tenants are households with special needs and/or	This Program has been successful in the 5th Cycle Planning Period. The City continues to encourage development of affordable housing and to speed up the permitting process by assigning a primary contact, holding pre-application meetings, and providing information in a timely manner. **Status:** This Program has been successful and will be continued for the 2023-2031 Housing Element.

lower income: • Assign a primary contact for priority housing developments to assist with all necessary entitlement and assist navigating various local departments; • Hold pre-application development conferences; and • Provide information about permit streamlining at the planning counter, on the City's website and in other public places to increase awareness. Responsibility: Development Services Department Timeframe: Ongoing	
GOAL 4: CONSERVE AND IMPROVE THE CONDITION OF EXISTING AFFORDABLE HOUSING STOCK.	
Policy 4.1 Increase rehabilitation efforts.	Refer to discussion below, for Programs 4.1a through 4.1c.
Program 4.1a: Continue to actively seek State and federal funding for the rehabilitation of homes. The City will consider annual applications for State CDBG, HOME, and Multi-family Housing Program funds depending on the need for additional funds and the City's ability to expend funds in a timely manner. Responsibility: Housing & Economic Development Department Timeframe: Ongoing – apply annually.	City staff continues to actively develop and apply for State CDGB, HOME, and Multi-Family Housing Program funds for the purposes of rehabilitating homes. **Status:** This Program will be continued as part of the 2023-2031 Housing Element.
Program 4.1b: Maintain database of housing conditions and rehabilitation projects to track accomplishments and assist in future goals. Responsibility: Community Development and Housing & Economic Development Departments Timeframe: Ongoing	City staff continues to actively maintain a database of housing conditions and rehabilitation projects to track accomplishments and assist in future goals. **Status:** This Program will be continued as part of the 2023-2031 Housing Element.
Program 4.1c: The City will conduct a Housing Condition Survey. This Housing Condition Survey will follow HCD Guidelines for	This Program has been partially implemented. The City did not conduct a Housing Condition Survey during the 5th Cycle Planning Period.

conducting a Housing Condition Survey. Results of the survey are to be published on the City's website and, as a result of the survey, the City will assist the Stanislaus County Housing Authority in rehabilitation and targeted efforts. Actions to be take following the results of the Survey include but are not limited to: • Apply for HOME and CDBG grant funds for rehabilitation projects identified as part of the Survey; and • Contact homeowners identified in the Survey as having a home qualifying for the rehabilitation program. Responsibility: Development Services and Housing & Economic Development Departments Timeframe: By December 2016, complete Housing Condition Survey and Ongoing assistance to the Stanislaus County Housing Authority	However, the City has a Home Rehabilitation Program that allows residents to apply for funding to address a variety of home repairs. During the 5th Cycle Planning Period, the City issued four loans for home rehabilitation. **Status:** This Program will be modified as part of the 2023-2031 Housing Element to include additional requirements and timing obligations to ensure that the Housing Condition Survey is completed.
Policy 4.2 Preserve current multi-family sites.	Refer to discussion below for Programs 4.2a and 4.2b.
Program 4.2a: Discourage land division of sites currently zoned high-density residential. • The City shall evaluate and make a written determination on the site constraints as a result of a proposed subdivided site currently zoned high-density residential. Responsibility: Development Services Department Timeframe: Ongoing	This Program is ongoing. The City continues to discourage land division of sites currently zoned high-density residential. The City did not receive any requests in the 5th Cycle Planning Period to subdivide a site that is zoned high-density residential. **Status:** This Program will be modified as part of the 2023-2031 Housing Element to clarify the zoning and to add additional measures to discourage land division of sites zoned high-density residential.
Program 4.2b: Monitor any units which may be deemed at-risk for conversion into market-rate housing. Ensure that any loss to the housing stock for lower income households is properly mitigated. Responsibility: Community Development Department Timeframe: Ongoing	This Program is ongoing. The City continues to monitor deed restricted lower income projects in the City and whether they are at-risk for conversion to market rate housing. All five (5) of the City's deed-restricted lower income housing are considered "low" risk for conversion to market rate housing. **Status:** This Program will be modified as part of the 2023-2031 Housing Element to include

	additional monitoring measures.
GOAL 5: PROMOTE HOUSING OPPORTUNITIES FOR ALL PERSONS REGARDLESS OF RACE, RELIGION, SEX, MARITAL STATUS, ANCESTRY, NATIONAL ORIGIN, COLOR, FAMILIAL STATUS, OR DISABILITY	
Policy 5.1 Make programs and information available to all persons.	Refer to the discussion below, for Programs 5.1a through 5.1c.
Program 5.1a: The City will continue to promote equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, nation origin, or color by supporting efforts of community groups that provide counseling, investigatory, legal, or referral services to victims of discrimination. Specifically, the City will: • Disseminate information in a variety of ways (including brochures, mailings, websites, newspaper ads, etc. in both English and Spanish) regarding rehabilitation and first-time homebuyer programs. • Maintain information on State and federal fair housing laws at the Community Development Department and other public places for public distribution (such as the Riverbank branch of the Stanislaus County Public Library, the Riverbank Community Center, and City Hall); • Train City staff at the public counter to refer victims of housing discrimination to the appropriate agency (local legal services organization, the Stanislaus County District Attorney's Office, the State Fair Employment and Housing Commission, or the U.S. Department of Housing and Urban Development); • Seek the cooperation of the local homebuilders association, Realtor association and lenders in disseminating fair housing information; and, • Identify an annual community event such as a fair housing day or as part of another community event at which fair housing information can be distributed. Responsibility: Housing & Economic	This Program is implemented and ongoing. The City continues to promote equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, nation origin, or color. The City provides fair housing services for Riverbank residents and tenants through the Stanislaus Regional Housing Authority. The Stanislaus Regional Housing Authority provides information regarding fair housing that addresses disability, familial status, and tenants' rights. The City also provides the Department of Fair Housing and Employment brochures which also address familial status and disability, among other fair housing topics. The City ensures that fair housing brochures are available at City Hall as well as other community locations. The City did not receive any fair housing inquiries during the 5th Cycle. **Status:** This Program has been effective but will be modified to include additional objectives to provide education and access to fair housing resources.

Development Department Timeframe: Ongoing	
Program 5.1b: To promote continued opportunity for public engagement, the City shall conduct an annual Housing Element review. Provide opportunities for public engagement and discussion in conjunction with the State requirement of written review of the General Plan by April 1 of each year (per Government Code Section 65400). Use the Planning Commission and City Council as an avenue for public input on housing issues and housing element implementation. Notices shall be prepared in English and Spanish and be published in a newspaper of general circulation and posted at City Hall North and South. Website and social media notification shall be encouraged. To ensure General Plan Consistency between the Housing Element and the other Elements of the General Plan, the City shall, in addition to the requirements above, complete the following: • Maintain the Draft General Plan Housing Element on the City's Website; • Develop an evaluation matrix to determine the consistency between the Housing Element policies and programs and the other Elements of the General Plan. Responsibility: Development Services Department Timeframe: Annually (April 1 of each year)	This Program has been implemented and is ongoing. The City continues to prepare the General Plan and Housing Element Annual Progress Report (APR) each per Government Code 65400. The Report is presented to the Planning Commission and City Council before submitting to the Governor's Office of Planning and Research (OPR) and the State Department of Housing and Community Development (HCD). The APRs are maintained on HCD's website and on the City's website. **Status:** This Program has been successful and will be continued as part of the 2023-2031 Housing Element.
Program 5.1c: To promote Public Participation in the Housing Element update process, the City shall utilize the following actions, including: • As noted in Program 5.1b, Public Notices for Housing Element Public Workshops shall be posted in English and Spanish and posted at various locations within the City including affordable housing developments, churches, schools, Community Center as well as the City's website and social media (Facebook); • The City shall partner with local	This Program is successful and ongoing. Public Workshop notices continue to be published in a variety of locations to increase exposure. **Status:** This Program will be continued as part of the 2023-2031 Housing Element.

Churches to present and solicit input on affordable housing within the City; • Public notices for activities related to the Housing Element shall be delivered in the Monthly water bill. Notices shall be printed in English and Spanish. Responsibility: Development Services Department Timeframe: Ongoing, Identify partner for Public Participation by December 2021	
GOAL 6: PROMOTE ENERGY CONSERVATION	
Policy 6.1: Continue to implement state energy-efficient standards.	Refer to discuss below for Program 6.1a.
Program 6.1a: Continue to implement state energy-efficient standards, including the addition of energy-efficient conditions to planned development approvals. Responsibility: Community Development Department Timeframe: Ongoing	The City provides information on methods to conserve energy, including CalGreen requirements and opportunities to retrofit existing properties through the Open PACE program, and other programs as they are available, at City Hall and via the City's website. **Status:** This Program will be continued as part of the 2023-2031 Housing Element.
Policy 6.2: Include energy conservation guidelines as part of the development standards for the specific plan area.	Refer to discussion below for Program 6.2a.
Program 6.2a: Continue to include energy conservation guidelines as part of development standards in new developments. Responsibility: Community Development Department Timeframe: Ongoing	As required per Title 24 of the California Code of Regulations, the City continues to include energy conservation standards on all new development within the City. **Status:** This Program will be continued as part of the 2023-2031 Housing Element.
Policy 6.3: Provide weatherization assistance to low-income households.	Refer to discussion below for Program 6.3a.
Program 6.3a: Continue to include weatherization as a typical repair in the City's housing rehabilitation program. Responsibility: Housing and Economic	The City has a Home Rehabilitation Program that allows residents to apply for funding to address a variety of home repairs. During the 5th Cycle Planning Period, the City issued four loans for home rehabilitation.

Development Department Timeframe: Ongoing	**Status:** This Program will be continued as part of the 2023-2031 Housing Element.

SECTION X
2023-2031 Housing Element - Housing Goals and Policies

A. INTRODUCTION

This section of the Housing Element contains the City's goals, policies, and proposed plan of actions to implement the City's housing program. The goals and policies reflect the needs identified previously in the Element. Each proposed implementation program contains a description of the intended action, an explanation of the agency responsible for administering the program, and the timeframe during which the program would take effect. Whenever possible, the anticipated results have been expressed in quantified terms.

Briefly stated, the Housing Goals are:

- To plan for a sufficient number of dwelling units to meet the City's regional housing share as determined by StanCOG within the confines of environmental considerations.
- To ensure an orderly approach to providing public services and facilities to meet the needs of new development
- To address the affordable housing needs of very low- and low-income households and to encourage the private sector to develop housing affordable to these income groups
- To conserve and improve the quality of Riverbank's existing housing stock and residential neighborhoods.
- To preserve existing affordable housing opportunities
- To plan for a balanced community that provides housing, employment, commercial services, and recreational opportunities.
- To ensure that housing is available to all present and future residents on a non-discriminatory basis.

The philosophy underlying the proposed policies and programs is that the Riverbank's role in the development of housing is one of facilitators. The City can lay the planning groundwork for housing construction, provide a favorable regulatory environment for housing, and apply for financial assistance from state and federal agencies. The City can also actively seek out interested builders who are willing to work with the City on alternative housing developments that will promote affordability for very low- and low-income households.

Whether or not appropriate amounts and types of housing are constructed has depended primarily on the decisions of home builders and non-profit housing corporations. The City, itself is not in the business of building housing. However, the City *can* help to ensure that lands designated for multi-family densities are not underdeveloped. This objective is reflected in the updated goals and policies.

B. GOALS

The City believes that, in the long run, with the implementation of these policies, a reasonable balance between the needs of its very low-, and low-income residents and the ability and willingness of the private market to respond to those needs through voluntary approaches can be achieved.

GOAL 1: IDENTIFY ADEQUATE SITES TO PROVIDE FOR A SUFFICIENT NUMBER OF DWELLING UNITS TO MEET THE CITY'S REGIONAL HOUSING NEEDS.

Policy 1.1 Ensure land use and zoning procedures accommodating to affordable housing.

Program 1.1a: **Adequate Sites for RHNA and Rezone Program**

The City shall designate sufficient land at various densities to allow for the construction of sufficient housing to meet its legally adopted HCD Regional Housing Need Allocation (RHNA) between 2024 and 2031. For the 6th cycle Housing Element, Riverbank has been assigned a RHNA of 3,591 units, in the following income categories:

- Very Low Income: 970 units
- Low Income: 672 units
- Moderate Income: 594 units
- Above Moderate Income: 1,355 units

The City is committed to ensuring that adequate sites as appropriate densities remain available during the planning period, as required by law. The City shall review, as needed, the amount of land designated for various residential uses in conjunction with the amount of and types of housing produced in the previous year to determine if any changes in the General Plan and Zoning Ordinance may be needed to meet the City's housing needs. A review of the supply of vacant land and development patterns over the preceding year will be incorporated into each annual evaluation of the City's implementation of the Housing Element programs. ~~The City shall prezone enough land outside the current city limits to accommodate the remaining housing need. The City shall inform local developers and affected landowners of the prezoning action through a public outreach effort (i.e., direct mailings, website postings, etc.). The outreach effort should also seek to encourage developer interest in annexation of prezoned land by describing development characteristics.~~

The City has identified 11 sites for rezoning to meet the RHNA. The rezone sites have the capacity to accommodate 739 units (506 very low-income and 339 low-income). These sites will need to be rezoned from Commercial, Industrial, Mixed Use, and Low Density Residential to High Density Residential allowing for a density of 20 dwelling units per acre. The rezone sites are described in Section VI, *Housing Opportunities*.

This program describes the actions the City will take to ensure that adequate sites are designated consistent with Government Code Section 65583(c)(1)(A) and 65583.2. The rezoned sites shall be subject to the following provisions pursuant to Government Code Section 65583.2(i):

- Permit owner-occupied and rental multi-family uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means approval without discretionary action.
- Permit the development of at least 16 units per acre.
- Establish a minimum density of 20 units per acre and a maximum density of at least 20 units per acre for all rezone sites to accommodate lower income RHNA.
- Ensure either: a) at least 50 percent of the shortfall of low- and very-low-income regional housing need can be accommodated on sites designated for exclusively residential uses; or b) if accommodating more than 50 percent of the low- and very-low-income regional housing need on sites designated mixed uses, all sites designated for mixed uses must allow 100 percent residential use and require that residential uses occupy at least 50 percent of the floor area in a mixed-use project.

To ensure that the City complies with SB 166 (No Net Loss), Program 1.2c requires the City to monitor the consumption of residential and mixed-use acreage to ensure that adequate inventory is available to meet the City's RHNA obligations.
~~Parcels to be rezoned are identified in Table VI-10. As reflected in Table VI-10, each potential rezoned site will be zoned for a minimum of 20 units per acre, have the capacity to accommodate at least 16 units, and be available for development in the planning period where water, sewer, and dry utilities can be provided. Sites rezoned will permit owner-occupied and rental multi-family uses by-right pursuant to Government Code Section 65583.2(h) and (i) for developments in which 20 percent or more of the units are affordable to~~

~~lower-income households. On rezoned sites, the City will allow 100 percent residential uses and shall require residential use to occupy at least 50 percent of the floor area in a mixed-use project. Any necessary specific plan amendments (e.g., Downtown Specific Plan and Crossroads West Specific Plan) will be adopted concurrently with the rezoning adoption.~~

Responsibility: Community Development Department

Timeframe: ~~Complete rezoning b~~By ~~December 31, 2025~~January 31, 2025, rezone properties as outlined above and detailed in Section VI, *Housing Opportunities* to fully accommodate RHNA. As part of the rezoning, confirm appropriate development standards (including parking, height, setbacks, lot coverage, etc.) will and can be met to ensure maximum allowable densities at the respective zones can be achieved.

Program 1.1b **Crossroads West Specific Plan**

In conjunction with Program 1.1a, the City shall maintain its vacant sites inventory by facilitating the development of the Crossroads West Specific Plan, and designate therein sufficient sites to accommodate the dwelling units identified in Table V-5, and specifically, those sites designated for higher density development in order to meet the regional housing needs of lower income households. The City shall permit the development of sites designated for higher density development in accordance with Section 65583.2(h) and (i) of the Government Code, including permitting multi-family housing without discretionary review, or beyond what is typically required by the City. The City will also consider allowing additional density bonuses within the Crossroads West Specific Plan for affordable housing development projects that commit to providing Extremely Low-, Very Low-, and Low-Income Housing. The City will take the following actions to identify and rezone, if necessary, higher density residential sites of equivalent capacity within 6-months to maintain a sufficient sites inventory to meet the City's Regional Housing Needs Allocation.

Responsibility: Development Services Department, Planning Commission, and City Council

Timeframe: By End of Year 2025

Program 1.1c **Accessory Dwelling Units**

~~**New**~~The following programs will be implemented to facilitate the production of Accessory Dwelling Units:

1. Continue to maintain the Pre-Approved Accessory Dwelling Unit plans prepared in coordination with Stanislaus County on the City's website. Coordinate with Stanislaus County to update the Pre-Approved Accessory Dwelling Unit plans to be consistent with California Building Code, as necessary.
2. Create and maintain informational materials and an ADU resource webpage on the City's website to publicize and promote the availability of standard building plans; post information about available funding for ADUs (e.g., CalHFA ADU Grant Program that provides up to $25,000 to reimburse homeowners for predevelopment costs). Materials will be made available through multiple outreach methods in addition to the City's website, press releases, utility mailers, email distribution lists, social media, community service groups, etc. and in multiple languages, as necessary.
3. Update the Zoning Code Accessory Dwelling Units Sections (Section 153.325 through 153.330) to be consistent with State law.

Responsibility: Community Development Department

Timeframe: Prepare informational materials by December 2026~~5~~. Update Zoning Ordinance by June, 2026

Program 1.1d **By-Right Approval**

Pursuant to Government Code Section 65583.2, reusing the following types of sites in the City's site inventory for lower-income RHNA are subject to by-right approval, exempt from CEQA and subject only to design review based on objective standards when a project includes 20 percent of the units affordable to lower-income households and no subdivision is proposed:

- Vacant sites that were identified in the City's 4th and 5th cycles Housing Element as sites meeting the lower-income RHNA; and
- Nonvacant sites that were identified in the City's 5th cycle Housing Element as sites for lower-income RHNA.

Rezoning of sites past the statutory deadline of the Housing Element to meet the lower-income RHNA are subject to the by-right approval requirement.

The by-right approval requirement of rezone sites is triggered by the rezoning. By-right shall mean the local government's review shall not require:

- A use permit
- A planned unit development permit
- Other discretionary, local-government review or approval that would constitute a "project" as defined in Section 21100 of the Public Resources Code.

This provision does not preclude the planning agencies from imposing design review standards. However, the review and approval process must remain ministerial, and the design review must not constitute a "project" as defined in Section 21100 of the Public Resources Code.

Parcels that are subject to by-right approval pursuant to state law are identified in Table VI-8 in Section VI, *Housing Opportunities*. Rezone parcels are identified in Table VI-10 and would be rezoned per Program 1.1a.

Responsibility: Community Development Department
Timeframe: By January 31, 2026, update the Zoning Code to address the by-right approval requirements.

Program 1.1e Replacement Housing

Development on non-vacant sites with existing residential units is subject to replacement requirements, pursuant to Assembly Bill (AB) 1397. Specifically, AB 1397 requires sites with a residential use within the last five years the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in the State's Density Bonus Law. The City shall amend the Zoning Code to establish replacement housing requirements.

Responsibility: Community Development Department
Timeframe: By January 31, 2026, update the Zoning Code to address the replacement housing requirements.

Program 1.1f Approved and Pending Projects

The 6th Cycle Housing Element includes a number of Approved and Pending Projects (Table VI-9) that are approved but not yet built that are being counted toward the City's RHNA for the 6th Cycle Planning Period. The City shall monitor the development of the projects listed in Table VI-9, *Approved and Pending Projects* and maintain contact with the applicant and/or property owner to help facilitate the development of the

projects. The City shall maintain a list of approved and pending projects, including expiration dates for the entitlement(s), and contact information for the applicant and property owner. The City shall update the list of approved and pending projects as projects are approved. The City shall bi-annually contact the applicant and/or property owner. The City shall develop alternative actions for projects that do not develop and/or the entitlement(s) expire.

Responsibility: Community Development Department

Timeframe: Create list of approved and pending projects by June 2026 and Bi-Annualy contact applicants/property owners of approved and pending projects. Develop alternative actions for pending and approved projects by January 31, 2026.

Policy 1.2: Maintain an inventory of vacant and underutilized residential lands.

Program 1.2a: **Multi-Family Developments**

Track changes in land availability and accomplishments in multi-family development to determine if further rezoning is necessary to better facilitate high-density developments.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing and Annually through the General Plan Housing Element Annual Progress Report

Program 1.2b: **Geographical Information Systems**

Update Geographical Information Systems (GIS) as changes to the land inventory occur. Provide this information to those interested in infill projects through updated layers viewable from the internet.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing

Program 1.2c **No Net Loss**

To ensure that the City complies with SB 166 (No Net Loss), the City will monitor the consumption of residential and mixed-use acreage to ensure that 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 develop and implement a formal 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 RHNA.

By January 31, 2026, the City will establish a formal procedure to monitor no-net-loss of capacity in meeting the City's RHNA. In 2027, the City will evaluate the progress of pending projects counted toward RHNA to ensure that development of housing units is occurring as projected. If it is determined after consultation with developers that the projects are not proceeding as planned and would result in a shortfall in RHNA sites, the City will identify alternative sites strategies (including potential rezoning) within six months.

Responsibility: Community Development Department
Timeframe: Establish formal procedure to monitor no-net-loss by July 2026
Evaluate progress of pending projects by 2027 and if necessary, identify alternative site strategies by six (6) months after evaluation

GOAL 2: ENCOURAGE AND ASSIST IN THE DEVELOPMENT OF ADEQUATE HOUSING TO MEET THE NEEDS OF EXTREMELY LOW-, LOW- AND VERY LOW-INCOME HOUSEHOLDS.

Policy 2.1: Implement a proactive approach to encourage and gain support for multi-family developments.

Program 2.1a: **Non-Profit Developers**
Seek assistance from non-profit developers, including Self-Help Enterprises and Habitat for Humanity to develop homes for lower-income families. The City will meet with non-profit developers to discuss available sites for affordable housing projects, potential funding sources, and actions the City can take to assist housing providers in obtaining funding.
Responsibility: Housing & Economic Development Department
Timeframe: Meet with non-profit developers annually thereafter to discuss affordable housing development opportunities, available funding, and the City's support of funding requests.

Program 2.1b: **Funding for Lower-Income Developments**
Continue to assist developers of extremely low-, low- and very-low-income housing in the grant preparation process to help fund their developments. Funding will be prioritized for the development of housing affordable to extremely low-income households. The City assists developers by expediting review and approval of development applications to meet funding deadlines and providing information needed to support funding requests.

Responsibility: Community Development Department ~~Development Services Department~~ and Housing & Economic Development Departments

Timeframe: Bi-Annually and as project applications are received.

Program 2.1c: **Accessory Dwelling Units in New Developments**

Encourage developers to include ~~second~~ accessory dwelling units in new subdivisions as well as a variety of higher density options. The City encourages developers to include accessory dwelling~~second~~ units by permitting such units without requiring additional lot area and allowing up to 50 percent lot coverage. The City permits such units by right in single-family subdivisions according to the requirements of State law.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing

~~Program 2.1d: Continue to distribute information on second units at the permit counter and post information on the City's website.~~

~~Responsibility: Development Services Department~~

~~Timeframe: Ongoing~~

Program 2.1de: **Farmworker Housing Technical Assistance**

Assist in the development of housing for farmworkers. Actions will include assistance with site identification and support of applications for funding. The City shall provide technical assistance when needed and continue to conduct pre-application conferences and meet with farm worker housing developers on an ongoing basis. Actions include:

- Post information on the Development Services website within 1-year of Housing Element adoption. Information includes a site inventory of available land (Program 2.1f), housing resources and grant information.
- Contact farmworker housing developers to determine interest and identify constraints to farmworker housing development within the City.

Responsibility: ~~Economic Development and~~ Housing Department and Community Development Department~~Development Services Department~~

Timeframe: Ongoing; Post information on ~~Development Services~~Community Development Department website within 1-year of Housing Element adoption; Identify and list Farmworker housing developers by December 2027.

Program 2.1ef **Farmworker Housing Development**

The City will work with the agricultural community, housing providers and agricultural groups to develop and build year-round and seasonal agricultural worker housing. This will require an analysis of prime agricultural areas in the City to identify suitable locations for at least 20 units of farmworker housing. Information gathered from this analysis shall be provided, in conjunction with Program 2.1e, to agricultural and affordable housing developers in a manner conducive to their use for developing the actual units. In addition, the City shall invite developers and local farmworker organizations to be involved in the Housing Element update and other housing related activities.

Responsibility: Community Development Department ~~Development Services~~ and Economic and Housing Department

Timeframe: Ongoing, Initiate analysis of prime agricultural areas in the City within 1-year of Housing Element adoption.

~~**Program 2.1g:** The City will update the uses permitted in the R-1 and R-2 Zone to include Transitional and Supportive Housing as a permitted use. In addition, the City shall amend the Uses Permitted with a Use Permit in the C-1, C-2, and C-M Zone to remove Transitional and Supportive Housing as a Permitted Use with a Use Permit. The C-1, C-2 and C-M Zone do not permit residential uses and Transitional and Supportive Housing, per State Law, shall be permitted by-right and require no discretionary review.~~

~~Responsibility: Community Development Department~~

~~Timeframe: By June 2025, adopt updated permitted uses.~~

Program 2.1fh: **Valley Mountain Regional Center**

The City shall refer residents to the Valley Mountain Regional Center for housing and services available for persons with developmental disabilities. Provide information on services on the City's website. As available, the City will pursue State and federal monies for direct support of housing construction and rehabilitation specifically targeted for housing for persons with developmental disabilities.

Responsibility: Community Development Department ~~Development Services Department~~ and Housing and Economic Development Department.

Timeframe: 2024-2031

Program 2.gi: **Infill Opportunity Area**

The City shall encourage housing development within the General Plan Infill Opportunity Area and specifically, sites designated Mixed Use. Housing development shall include housing for extremely low-, very-low-, and low-income group. Strategies to achieve new and infill housing include:

- Allow sites to be developed with stand-alone residential uses and densities of at least 20 dwelling units per acre, provided the development proposal includes an affordable housing component;
- In conjunction with Program 1.2a, the City shall keep an up-to-date inventory of vacant and underutilized sites within the Infill Opportunity Area; and
- Encourage affordable housing developers to, such as Habitat for Humanity, to locate affordable housing projects within the Infill Opportunity Area.

Responsibility: Community Development Department
Timeframe: 2024-2031

Program 2.1hj **Continuum of Care**

Regional cooperation with homeless needs. The City shall participate in the Stanislaus County Housing and Support Service Collaborative (SCHSCC) and the Continuum of Care to help address homeless needs in Riverbank and Stanislaus County. Actions include:

- Coordinate with the Stanislaus County Housing Authority on the Continuum of Care;
- Have a point of contact in Riverbank within the Development and/or Housing Department

Responsibility: Community Development Department ~~Development Services~~ and Housing ~~Department~~Division
Timeframe: Ongoing, Coordinate with the Stanislaus ~~County~~ Regional Housing Authority within 1 year of Housing Element adoption.

~~**Program 2.1k** The City shall amend its Zoning Ordinance to amend the Riverbank Zoning Code to add provisions for single room occupancy (SRO) units. The amendment shall include the following:~~

- ~~Amend Definitions (Section 153.003) to include Single Room Occupancy Units (SRO)~~
- ~~Amend the Single Family Residential District R-1 zone to include Single Room Occupancy Units~~
- ~~Amend the Single Family Residential District R-1 Zone to include Single Room Occupancy units as a permitted use Section 153.031).~~

~~Responsibility: Community Development Department~~

~~Timeframe: By June 2026, adopted updated permitted uses.~~

~~**Program 2.1L** The City shall amend its Zoning Ordinance to amend the Riverbank Zoning Code to add provisions to allow Muli-family development in Mixed Use zoning districts to be developed at a minimum density by right. The amendment shall include the following:~~

- ~~Amend the Mixed Use Zoning District permitted uses to include development of multi-family residential units by right when developed at a minimum density of 20 units per net are.~~

~~Responsibility: Development Services Department~~
~~Timeframe: By June 2026, adopt Zoning Ordinance text Amendment.~~

Program 2.1i Inclusionary Housing Ordinance

The City will research an Inclusionary Housing Ordinance. This Ordinance will identify acceptable methods to provide affordable housing such as: a) construction of housing on-site, b) construction of housing off-site, c) dedication of land for housing, and d) payment of an in-lieu fee. Development of this Ordinance requires an analysis of the following variables:

- Limiting the application of the ordinance to developments exceeding a certain size.
- Percentage of housing units required to be set aside as affordable.
- Design and building requirements.
- Timing of affordable unit construction.
- Determination of a fee in lieu of developing affordable units.
- Developer incentives, such as fee deferrals and waivers.
- Administration of affordability control.

Responsibility: Community Development Department, Housing Division
Timeframe: Determine the appropriateness of an inclusionary housing ordinance within two (2) years after adoption of the Housing Element. If determined appropriate, adopt an Inclusionary Housing Ordinance within one (1) year of making the determination.

Program 2.j **Housing Choice Voucher Program**

The City of Riverbank contracts with the Stanislaus Regional Housing Authority to manage the Housing Choice Voucher (HCV) program, which provides rent subsidies in the form of housing assistance payments to private landlords on behalf of eligible families. The HCV program, funding by HUD, provides housing assistance to extremely low and very low-income families, senior citizens, and disabled or handicapped persons. Its objective is to provide affordable, decent and safe housing for eligible families, while increasing a family's residential mobility and choice.

The City will disseminate information to the public regarding the HCV program and promote participation by rental property owners. By June 2026, the City will create a Fair Housing Factsheet to be included on the City's website, including information from Project Sentinal. The City shall also contact the Stanislaus Regional Housing Authority to obtain information on the status of the HCV program and other available resources. The City will continue to support the Stanislaus Regional Housing Authority to increase funding from HUD and increasing HCVs to Riverbank residents, as appropriate.

Responsibility: Community Development Department, Riverbank Housing Division

Timeframe: Create Fair Housing Factsheet by June 2026

Policy 2.2: Encourage revitalization and expansion of residential development and opportunities within the City's Downtown Specific Plan area.

Program 2.2a: **No Net Loss in Downtown Specific Plan Area**

To ensure that there is no net loss of residential development potential for the vacant sites designated Downtown Core, Mixed Use Neighborhood, and Downtown Neighborhood, as identified in the Downtown Specific Plan, the City shall encourage redevelopment in the Downtown area that results in a two to one replacement of any existing housing units displaced by redevelopment projects in the Downtown area.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: 2024-2031 Planning Period

Program 2.2b **Development in Downtown Specific Plan Area**

In conjunction with Program 2.2a, the City shall coordinate with Developers and Non-Profit Housing Providers (i.e., Housing Authority of Stanislaus County, Stanislaus Habitat for Humanity, etc.) on the implementation of the Downtown Specific Plan. The City shall consider joint venture partnerships with developers and/or property owners to help facilitate land assembly, option agreements, and outright land purchase for projects consisting of attached single-family and multi-family residential for extremely low, very low, and low-income households within the Downtown Specific Plan area.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Annually

Program 2.2c **Facilitating Mixed-Use Developments in Downtown Specific Plan Area**

The City shall encourage the development of new housing of upper stories and mixed-use buildings in the Downtown Core area of the Downtown Specific Plan. Where feasible, City staff shall assist Property Owners and/or Developers in identifying sites suitable for upper story residential development, identifying Grant funding opportunities, and expedite permit processing through Community Development Department

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: 2024-2031 Planning Period

GOAL 3: REDUCE OR REMOVE GOVERNMENT CONSTRAINTS.

Policy 3.1 Promote efficient and creative alternatives to help reduce government constraints.

Program 3.1a: **Planned Development Zones and Tiny House Villages**

Continue to promote the use of Planned Development zones for developers who wish to deviate from setback, parking, or other standards which may limit their ability to develop at a desired density. Tiny Homes development standards will be promoted to interested developers. The City will update the website to promote the use of the Planned Development Zone and the Tiny House Villages Ordinance (Sections 153.170 through 153.177 of the Riverbank Municipal Code). Additionally, the City, on an annual basis, contact developers to promote the use of the Planned Development zone and Tiny House Villages Ordinance.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: ~~Ongoing~~By June 2026, update the City's website to provide information related to the Planned Development Zone and the Tiny House Villages Ordinance

Program 3.1b: **Fee Waiver Program**

The City will waive fees for General Plan Amendments intended solely to increase residential designations from low-to-medium density to medium-to-high density residential. The City will apply the fee waiver at the time of submittal of a complete application. The City will also defer fees for developments with units affordable to lower-income households until the time of first inspection or as established in a development agreement between the City and the project applicant. The City will promote its fee waiver program through distribution of a brochure at the permit counter, posting of information on the City's website, and distribution of information to the local building industry association.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing

Program 3.1c: **Permit Software for Building Permit Processing**

Continue to utilize computer software to help fast-track building permits, saving both developer and staff time.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing

Program 3.1d: **Off-Street Parking**

As parking requirements are a common constraint throughout the State of California, the City shall review the off-street parking requirements to ensure that off-street parking for multi-family and special housing needs developments is not a constraint. ~~and amend to reduce the City's parking standards (inclusive of guest parking) for multifamily uses in the R-2 and R-3 zones as follows:~~

- ~~Zero to one (1) bedroom: one onsite parking space;~~
- ~~Two to three bedrooms: one and a half onsite parking spaces; and~~
- ~~Four or more bedrooms: two- and one-half onsite parking spaces.~~

The City shall provide this information at the planning counter, on the City's website and in other public spaces to increase awareness.

~~In addition, the City will review the Zoning Code annually to determine if any amendments need to be made to the Parking standards for multi-family and special housing, to reduce constraints to multi-family housing development.~~

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Review Zoning Code Parking Standards annually and make information available to the public by ~~Spring of~~June 2026.

Program 3.1e **Water and Sewer Service**

In accordance with Government Code Section 65589.7, immediately following City Council adoption, the city must deliver to all public agencies or private entities that provide water and sewer services to properties within Riverbank a copy of the ~~2023-2031~~ Housing Element. The City of Riverbank provides water and sewer services to all residents and businesses within the City. As such, a copy of the adopted ~~2023-2031~~ Housing Element will be provided to the applicable Department(s) within 30-days. The City will also establish a written procedure by the end of ~~2025~~ January 31, 2026 pursuant to Government Code Section 65589.7 to provide priority water and sewer service to development with units affordable to lower income households.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Within 30 days of adoption of the Housing Element, prepare written procedures by ~~the end of 2025~~January 31, 2026

Program 3.1f: **Lower-Income and Special Needs Housing**

Affordable housing developers often face constraints to developing affordable housing projects. One way the City can assist such developers is by providing fast-track/priority processing for low-income and special needs housing projects. This service can encourage affordable housing development by allowing developers to go through the approval and permitting process quicker keeping costs down and units affordable. It is important that following the construction of the project that units are monitored to ensure that subsequent tenants are households with special needs and/or lower income:

- Assign a primary contact for priority housing developments to assist with all necessary entitlement

and assist navigating various local departments;
- Hold pre-application development conferences; and
- Provide information about permit streamlining at the planning counter, on the City's website and in other public places to increase awareness.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing

Program 3.1g Accessibility in Housing and Public Facilities

The City will continue to implement state requirements (Sections 4450 to 4460 of the California Government Code and Title 24 of the California Code of Regulations) to include accessibility in housing and public facilities for persons with disabilities and will review and revise findings for approving reasonable accommodation requests, specifically, the establishment, maintenance, or operation of the temporary activity would not be detrimental to the public health, safety, or welfare of persons residing or working in the neighborhood of proposed activity, to ensure they do not pose any barriers to housing for persons with disabilities.

Responsibility: Community Development Department

Timeframe: Ongoing, as applications are processed by the City; review and revise regulation findings as needed, and specifically remove requiring any type of fee, by December 2025

Program 3.1h Planning and Finance Transparency

Government Code Section 65940 ensures the public has access to a jurisdiction's planning and financial documents, Planning applications, General Plans, Zoning Ordinance including zoning, zoning map, and other planning-related documents as well as financial documents, including fee schedules, current and historical budgets and financial reports, and an archive of fee, cost of service, and equivalent studies.

Responsibility: Community Development Department and Finance Department

Timeframe: Provide planning and financial documents through the City's website to ensure transparency pursuant to Government Code Section 65940, no later than December 31, 2026

Program 3.1i **Wastewater Treatment Plant Upgrades**

The City of Riverbank is the provider of water and sewer services within city limits. Currently, the City's Wastewater Treatment Plant (WWTP) consists of a headworks system, aerated treatment ponds, associated piping and mechanical components. Flow is gravity fed through the system and controlled with system valving/piping.

The maximum permitted treatment capacity as prescribed under Waste Discharge Requirements (WDRs) Order No. 94-100 and the associated monitoring and reporting program, which was adopted by the Central Valley Regional Water Quality Control Board (RWQCB), on April 22, 1994, is 7.9 mgd though the actual capacity of the WWTP is closer to approximately 1.6 mgd, and the plant is nearing capacity.

The City has two (2) future needs at the WWTP. One is to convert (upgrade) the WWTP from a secondary to a tertiary facility. Second, and as part of that conversion, the City intends to increase (expand) the WWTP capacity. Historically, the City has been able to increase capacity at the WWTP by adding aerators, refurbishing ponds, and making other minor adjustments, equipment or operational, at the WWTP. Some of these options might still be available, but they are not long-term solutions and would result in modest capacity increases.

To consider and evaluate the future upgrades at the WWTP, the City prepared the Recycled Water Production Study (KSN, January 2022), and the Preliminary Design Report (KSN, December 2022), and the City Council authorized the City Staff and consultant to proceed with the project by action on December 13, 2022.

The City will track the planned upgrades to the City's WWTP to ensure that the upgrades occur to accommodate the City's RHNA.

Responsibility: Public Works, Community Development Department
Timeframe: By January 31, 2030, complete upgrades to the WWTP

Program 3.1j **Amendments to the Riverbank Municipal Code and Specific Plans**

Implement the following amendments to the Riverbank Municipal Code, Chapter 153, *Zoning*, to remove governmental constraints and facilitate special needs housing:

1. Explicitly allow for Single Room Occupancy units (SROs) to facilitate the provision of affordable housing or lower-income individuals, including seniors, persons with disabilities, and extremely low-income households. The amendment shall permit SROs in the CX-1, Mixed Use Zoning District, the Mixed Use 1 Zoning District in the Crossroads West Specific Plan (Section 4.44.1.3), the C-1, Neighborhood Commercial District, C-2, General Commercial District, and shall include development standards such as site area, unit size, common area, management, off-street parking, and bathroom and kitchen facilities.
2. Amend the Crossroads West Specific Plan Mixed Use 1 Allowable Land Uses (Section 4.4.1.3) to add language to Section 4.4.1.3(C) that Attached Higher Density Residential at a minimum density of 20 dwelling units per net acre shall be by-right for projects that propose at least 20% of the units affordable to lower-income households.
3. Allow low barrier navigation centers by-right in all areas zoned for mixed-use and non-residential zones permitting multifamily uses, consistent with AB 101 (Government Code Section 65651).
4. Define and provide zoning provisions for farmworker and employee housing in accordance with California Health and Safety Code Sections 17021.5 and 17021.6 and establish a streamlined, ministerial process for eligible agricultural employee housing developments pursuant to California Health and Safety Code Section 17021.8.
5. Amend the Crossroads West Specific Plan Mixed Use 1 Allowable Land Uses (Section 4.4.1.3) to include Transitional and Supportive Housing as a permitted use. The Transitional and Supportive Housing use shall reference the definition in the Riverbank Municipal Code.

6. Review and revise Transitional and Supportive Housing provisions in the Riverbank Municipal Code to be consistent with Government Code Section 65583(c)(3) and to allow eligible supportive housing as a by-right use in zones where multifamily and mixed uses are permitted pursuant to AB 2162
7. Establish objective standards for Emergency Shelters, including but not limited to maximum number of beds, location, requirement for preparation of a management plan, provisions for shelters to include common facilities and services, client intake areas, off-street parking, lighting, on-site security, and compliance with applicable codes and regulations. The objective standards shall not exceed the provisions pursuant to Government Code Section 65583.
8. Review and update Section 153.185, *Affordable Housing Density Bonus* to be consistent with Government Code Section 65915 to equally provide for density bonuses in all zoning districts where residential uses are permitted and to include provisions relative to density bonuses, incentives, and concessions as required by State law.
9. Establish streamlined, ministerial review process and objective design standards for qualifying multifamily, urban infill projects, as required by SB 35.
10. Allow Residential Care Facilities of seven or more residents in all zones that permit residential uses, approved with objectivity and certainty, and subject only to the requirements of residential uses of similar type and form. Review and amend the Zoning Code to allow Residential Care Facilities of six or less residents in residential zoning districts pursuant to State law.
11. Amend Section 153.064, *Development Standards* in the Multiple Family Residential District R-3 Zone to clarify that the open space requirement shall apply to multiple residential uses of five (5) or more dwelling units and that the requirement shall be for a playground or other open space, not a fenced playground or other open space area that only applies to an adult-only facility.

Responsibility: Community Development Department
Timeframe: By January 31, 2026, amend the Riverbank Municipal Code

GOAL 4: CONSERVE AND IMPROVE THE CONDITION OF EXISTING AFFORDABLE HOUSING STOCK.

Policy 4.1 Increase rehabilitation efforts.

Program 4.1a: **Affordable Housing Funding**

Continue to actively seek State and federal funding for the rehabilitation of homes. The City will consider annual applications for State CDBG, HOME, and Multi-family Housing Program funds depending on the need for additional funds and the City's ability to expend funds in a timely manner.

Responsibility: Housing Division ~~&~~and ~~Economic Development Department~~Community Development Department

Timeframe: ~~Ongoing – apply annually.~~Apply for funding on an annual basis through the Housing Division and the Stanislaus Regional Housing Authority

Program 4.1b: **Housing Conditions Database**

Maintain database of housing conditions and rehabilitation projects to track accomplishments and assist in future goals.

Responsibility: ~~Development Services~~Community Development Department and Housing & Economic Development Departments

Timeframe: Ongoing

Program 4.1c: **Housing Condition Survey**

The City will conduct a Housing Condition Survey. This Housing Condition Survey will follow HCD Guidelines for conducting a Housing Condition Survey. The results of the survey are to be published on the City's website and, as a result of the survey, the City will assist the Stanislaus ~~County~~ Regional Housing Authority in rehabilitation and targeted efforts. Actions to be take following the results of the Survey include but are not limited to:

- Apply for HOME and CDBG grant funds for rehabilitation projects identified as part of the Survey; and
- Contact homeowners identified in the Survey as having a home qualifying for the rehabilitation program.

Responsibility: Community Development Department ~~Development Services~~ and Housing & Economic Development Departments

Timeframe: By December 2026, complete Housing Condition Survey and ~~Ongoing~~ In conjunction with Program 4.1a, the City will coordinate with the ~~assistance to the~~ Stanislaus ~~County~~ Regional Housing Authority

Policy 4.2 Preserve current multi-family sites.

Program 4.2a: **Land Division of High Density Residential Sites**
Discourage land division of sites currently zoned high-density residential.

- The City shall evaluate and make a written determination on the site constraints as a result of a proposed subdivided site currently zoned high-density residential.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing and as applications for proposed subdivisions are received by the Community Development Department

Program 4.2b: **At-Risk Housing**
Monitor any units which may be deemed at-risk for conversion into market-rate housing. Ensure that any loss to the housing stock for lower income households is properly mitigated. The City will reach annually reach out projects who are at risk of converting to market rate units.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing

GOAL 5: PROMOTE HOUSING OPPORTUNITIES FOR ALL PERSONS REGARDLESS OF RACE, RELIGION, SEX, MARITAL STATUS, ANCESTRY, NATIONAL ORIGIN, COLOR, FAMILIAL STATUS, OR DISABILITY

Policy 5.1 Make programs and information available to all persons.

Program 5.1a: **Equal Housing Opportunity**
The City will continue to promote equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, nation origin, or color by supporting efforts of community groups that provide counseling, investigatory, legal, or referral services to victims of discrimination. Specifically, the City will:

- Disseminate information in a variety of ways (including brochures, mailings, websites, newspaper ads, etc in both English and Spanish) regarding rehabilitation and first-time homebuyer programs.
- Maintain information on State and federal fair housing laws at the Community Development Department and other public places for public distribution (such as the

Riverbank branch of the Stanislaus County Public Library, the Riverbank Community Center, and City Hall);

- Train City staff at the public counter to refer victims of housing discrimination to the appropriate agency (local legal services organization, the Stanislaus County District Attorney's Office, the State Fair Employment and Housing Commission, or the U.S. Department of Housing and Urban Development);
- Seek the cooperation of the local homebuilders association, Realtor association and lenders in disseminating fair housing information; and,
- Identify an annual community event such as a fair housing day or as part of another community event at which fair housing information can be distributed.
- Partner with local jurisdictions and the housing industry to conduct a housing summit to provide housing information to interested residents.

Responsibility: Housing & Economic Development Department
Timeframe: Ongoing

Program 5.1b: **Annual Progress Report**

To promote continued opportunity for public engagement, the City shall conduct an annual Housing Element review. Provide opportunities for public engagement and discussion in conjunction with the State requirement of written review of the General Plan by April 1 of each year (per Government Code Section 65400). Use the Planning Commission and City Council as an avenue for public input on housing issues and housing element implementation. Notices shall be prepared in English and Spanish and be published in a newspaper of general circulation and posted at City Hall North and South. Website and social media notification shall be encouraged. To ensure General Plan Consistency between the Housing Element and the other Elements of the General Plan the City shall, in addition to the requirements above, complete the following:

- Maintain the Draft General Plan Housing Element Review on the City's Website;
- Develop an evaluation matrix to determine the consistency between the Housing Element policies and programs and the other Elements of the General Plan.

Responsibility: Community Development Department
Timeframe: Annually (April 1 of each year)

Program 5.1c: **Housing Element Public Participation**

To promote Public Participation in the Housing Element update process, the City shall utilize the following actions, including:

- As noted in Program 5.1b, Public Notices for Housing Element Public Workshops shall be posted in English and Spanish and posted at various locations within the City including affordable housing developments, churches, schools, Community Center as well as the City's website and social media (Facebook);
- The City shall partner with local Churches and local interest groups to present and solicit input on affordable housing within the City. The contact list for Churches and local interest groups shall be maintained by the City and updated each Planning Cycle;
- Public Notices for activities related to the Housing Element shall be delivered in the Monthly water bill. Notices shall be printed in English and Spanish.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing, Identify partner for Public Participation by December 2030.

GOAL 6: PROMOTE ENERGY CONSERVATION

Policy 6.1: Continue to implement state energy-efficient standards.

Program 6.1a: **State Energy-Efficient Standards**

Continue to implement state energy-efficient standards, including the addition of energy-efficient conditions to planned development approvals.

Responsibility: Community Development Department~~Development Services Department~~

Timeframe: Ongoing

Policy 6.2: Include energy conservation guidelines as part of the development standards for the specific plan area.

Program 6.2a: **Energy Conservation Guidelines**

Continue to include energy conservation guidelines as part of development standards in new developments.

Responsibility: Community Development Department

Timeframe: Ongoing

Policy 6.3: Provide weatherization assistance to low-income households.

Program 6.3a: **Weatherization Assistance**
Continue to include weatherization as a typical repair in the City's housing rehabilitation program.
Responsibility: Housing and Economic Development Department
Timeframe: Ongoing

C. ANTICIPATED HOUSING ACCOMPLISHMENTS: 2023-2031

The City believes that the programs and objectives described in this section represent the maximum effort the City can make to accommodate housing for all income groups. In developing quantified objectives, the City has considered:

- Development costs for market-rate housing and how the City can reduce these costs, still provide necessary public services and facilities, and maintain a minimum acceptable standard of development quality;
- The zoning densities which are appropriate to accommodate very low-, low-income housing yet which are still sensitive to the City's environmental character and existing residential neighborhoods;
- Available local financial and staff resources to implement the City's housing program (the City does not anticipate having sufficient funding to provide more than 1 staff positions to support the City's housing program and other community development programs);
- Available state and federal sources of funding for affordable housing developments; and,
- The ability of the private sector to assist the City in implementing proposed housing programs. The housing program makes a conservative estimate, therefore, of the number of market rate and government-assisted housing units affordable to very low, low and moderate-income households that could be provided from the programs described above.

Table X- 1 - QUANTIFIED OBJECTIVES (2023 - 2031)

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
Accommodate Regional Housing Needs[1]	~~160~~485	~~161~~485	~~206~~672	~~217~~594	~~536~~1,355	~~1,280~~ 3,591
New Housing Construction	500	500	~~145~~708	~~36~~00	~~500~~1,400	~~1,045~~ 3,708
Housing Rehabilitation	33	32	35			**100**
Conservation of Affordable Housing[2]	100					**100**
Homebuyer Assistance	7	8	20			**35**

1. STANCOG ~~2014-2023~~2023-2031 Regional Housing Allocation Plan
2. Conservation of non-assisted low-cost rental housing through the City's code enforcement program and the preservation/improvement of mobilehome parks.

APPENDICES

APPENDIX A

AVAILABLE HOUSING PROGRAMS – CITY OF RIVERBANK

APPENDIX A
Available Housing Programs - City of Riverbank

A. HOUSING REHABILITATION PROGRAM

The City of Riverbank's Housing Rehabilitation Program currently has funds available to assist families and individuals with home repair and rehabilitation needs. The purpose of the program is to eliminate hazardous conditions in the home, correct code deficiencies and extend the useful life of the structure.

Typical repairs include: roof repair or replacement; electrical, plumbing or structural repairs; room additions to lessen over-crowding; installation of central heat and air conditioning; window repair or replacement; weatherization; handicapped access including wheelchair ramps; and floor-covering repair or replacement.

As of 2018, the maximum loan amount is $150,000, which is provided as a non-interest and/or below-market interest rate mortgage. The fixed interest rate is 0% or 3% per year for owner-occupied housing, and 5% per year for renter-occupied housing. Loan terms are for 15 years with a non-prepayment penalty policy.

Elderly owner-occupants (62 years of age or older), who are low to very low-income and paying more than 30% of their income toward housing expenses, can receive a 15-year term deferred loan. Loans are non-amortized with repayment due upon sale of the property. Loans made to other low-income owner-occupants and owner-investors are amortized over the term of 15 years with small monthly payments required.

Income limits to determine eligibility change yearly. Interested applicants should contact the City of Riverbank's Economic Development and Housing Department for more information.

B. FIRST-TIME HOMEBUYERS ASSISTANCE PROGRAM

The First-Time Homebuyers Program provides an opportunity for qualified low-income households to buy their first home in Riverbank.

Since 2014, the City of Riverbank Housing Division has issued eighteen (18) first-time homebuyers assistance loans amounting to $1,333,571. All eighteen (18) issued were for low income and moderate income groups.

1. Assistance Available

Up to $70,000.00 is available as a deferred payment loan (DPL) for a 30-year period. The loan can be used to cover initial costs such as loan origination, points, title insurance, escrow fees, impounds, etc., in addition to mortgage subsidy to reduce principal, interest,

taxes, and insurance (PITI) to an affordable level, based on household income. At the end of the 30-year term, the loan shall retain the non-interest rate payable on the 31st anniversary date. Funds are available through the Home Ownership Partnership Program (HOME) or the First Time Home Buyers Program (FTHB) funded by State of California Housing and Community Development (HCD).

2. Property Qualifications

The property must be located within the City Limits of Riverbank. Purchase price limit is subject to the Stanislaus County maximum of $362,790. The home must be a structurally sound, and homes built prior to 1978 must provide Lead Base Paint Clearance. New developments must have foundations poured and can be under construction or at final stage. A unit is ineligible if its purchase would result in the displacement of the tenant.

3. Procedure

The first step is to contact the City's Housing staff in regards to the program procedure funds availability and placement on interest list. Notification of funds will be conducted by provided phone contact. Once the application has been received, applicants must schedule an interview appointment to determine the household eligibility. Once eligibility has been determined, the applicant will receive instructions on the proceeding loan process. To remain eligible, the applicant has 60 days to enter into a real estate purchase contract.

Applicants must work with lenders to determine the amount of payment the family can afford and loan approval. Lenders may contact the City of Riverbank for loan process guidance if the lender is unfamiliar with the city program. Applicants must provide sufficient personal funds to cover 1% of purchase, providing records of season money or gift letter from anyone except person(s) holding deed on the property being purchased.

The applicant works with a real estate agent on the selection of a home, makes an offer and enters the purchase contract. Applicant, realtor, and lender must join all documentation as one loan application package providing the analysis of the applicant's need to be submitted to the City's Housing Department. Housing staff will stamp-date the loan received, evaluate for completeness and analyze process. All parties involved in this application process must plan for at least a 45-day escrow upon complete package acceptance.

Updated information regarding income qualifications and funds available can be acquired from the Economic Development and Housing Department. The City of Riverbank is an Equal Housing Lender and does not discriminate on the basis of race, color, religion, sex, handicap, familial status, or national origin.

APPENDIX B

HOUSING CONDITION SURVEY – CITY OF RIVERBANK

APPENDIX B
Housing Condition Survey
City of Riverbank

Funded By:
State of California Department of Housing and Community Development
California Development Block Grant No. 02-STBG-1762
May/June 2003

PURPOSE

A housing condition survey was conducted in 2003 covering the proposed Riverbank target area. The purpose of the survey was two-fold: first, to gather information in order to assess the feasibility of implementing a housing rehabilitation project in the area; second, to develop a program design which would effectively address demonstrated housing needs. The survey was conducted in accordance with the California Department of Housing and Community Development guidelines.

METHODOLOGY

During the months of May and June 2003, staff of the Community Development Department for the City of Riverbank drove every street in the Housing Condition Target Area and completed a Housing Condition Survey for each housing structure.

Each structure was rated according to criteria established by the State Department of Housing and Community Development (HCD). There are five structural categories: foundation, roofing, siding, windows, and electrical. Within each category, the housing unit is rated from "no repairs needed" to "replacement needed." These condition points are added together for each unit and a finding was made identifying each unit as being sound, in need of minor repair, moderate repair, and substantial repair or dilapidated. The last designation is applied to units on which only correction of health and safety factors or demolition is economically feasible (i.e., too expensive to bring up to the Uniform Housing Code Standards).

Upon completion of the surveys, collected data was collated and analyzed.

2003 SURVEY RESULTS

By APN Book Number and Tenure

BOOK NUMBER	SOUND CONDITION		MINOR REPAIR		MODERATE REPAIR		SUBSTANTIAL REPAIR		DILAPIDATED		TOTAL
	Single	Multi	Single	Multi	Single	Multi	Single	Multi	Single	Multi	-
62	**6**	**0**	**10**	**0**	**6**	**2**	**2**	**0**	**0**	**0**	**26**
74	**367**	**45**	**17**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**430**
75	**1872**	**2**	**199**	**186**	**318**	**135**	**53**	**25**	**10**	**9**	**2809**
132	**412**	**9**	**305**	**42**	**657**	**72**	**144**	**5**	**43**	**0**	**1689**
Subtotal	**2657**	**56**	**531**	**228**	**982**	**209**	**199**	**30**	**53**	**9**	**-**
TOTAL	**2713**		**759**		**1191**		**229**		**62**		**4954**

Housing Condition Survey Form

Map#_____ **Address_____**
Vacant (__Yes/__No) For Sale (__Yes/__No)
City_____

CONSTRUCTION TYPE

Wood Frame _____
Masonry _____
Mobile _____
Modular _____
Other _____

STRUCTURE TYPE

Single Family w/ Detached Garage _____
Single Family w/ Attached Garage _____
Duplex _____
Multi-Family _____ # of Units _____
Other _____

FRONTAGE IMPROVEMENTS IF APPLICABLE:

_____ CURBS (__Yes/__No)
_____ GUTTERS (__Yes/__No)
_____ ADEQUATE SITE DRAINAGE (__Yes/__No)
_____ PAVED STREET (__Yes/__No)
_____ SIDEWALKS (__Yes/__No)
_____ DRIVEWAY (__Yes/__No)

#1 – FOUNDATION:

0 Existing foundation in good condition
10 Repairs needed
15 Needs partial foundation
25 No foundation or needs a complete foundation

#2 – ROOFING:

0 Does not need repair
5 Shingles missing
5 Chimney needs repair
10 Needs re-roofing
25 Roof structure needs replacement & re-roof

#3 – SIDING/STUCCO:

0 Does not need repair
1 Needs re-painting
5 Needs to be patched and re-painted
10 Needs replacement and painting
10 Asbestos/Lead-Based

#4 – WINDOWS:

0 No repair needed
1 Broken window panes
5 In need of repair
10 In need of replacement

#5 – ELECTRICAL:

0 No repair needed
5 Minor repair
10 Replace main panels

Sound	9 or less
Minor	10 – 15
Moderate	16 – 39
Substantial	40 – 55
Dilapidated	56 and over

Dilapidated: a unit suffering from excessive neglect, where the building appears structurally unsound and maintenance is nonexistent, not fit for human

	#1 Foundation	#2 Roofing	#3 Siding/Stucco	#4 Windows	#5 Electrical	TOTAL
Points						

COMMENTS:

Surveyor:_____ Date: _____

APPENDIX C

PROCESSING TIME OF VARIOUS DEVELOPMENT APPLICATIONS

APPENDIX C
Processing Time of Various Development Applications

PROCESSING TIME

Processing time is an important factor for all housing unit construction, but specifically for projects being developed under volatile financial conditions. The City has become accustomed to processing a large volume of projects, however, the average processing time per project can increase significantly depending on the complexity of the project in question.

The following are average processing times for various types of land use approvals:

- Subdivision Maps - 16 weeks
- Zone Change - 16 weeks
- (Conditional) Use Permit - 8 weeks
- Site Plan Review - 8 weeks
- Planned Development - 20 weeks
- General Plan Amendment (No EIR) - 20 weeks
- General Plan Amendment (With EIR) - 56 weeks

These typical processing times are in compliance with state-mandated timeframes for development review. The City believes these are reasonable timeframes that do not pose a constraint to meeting the City's housing needs. To reduce the overall development review time for complicated proposals and proposals requiring multiple approvals, the City encourages concurrent reviews of multiple-approval projects.

SITE IMPROVEMENTS REQUIREMENTS

The City of Riverbank Subdivision Ordinance identifies the following site improvements and security and form of final maps.

- Subdividers shall have their contractors for subdivision improvements consult with the Director before any construction is started to arrive at an understanding as to requirements and the schedule of inspections required.

- All improvements in subdivisions shall be installed as required to the specifications and standards established by the City Council. The City's Construction Inspector shall administer or perform inspections to determine conformance.

- Plans and profiles for proposed improvements shall be submitted to and approval obtained from the City Engineer prior to the commencement of construction. A plan of the entire subdivision shall be on the first sheet of improvement plans.

- Inspection fees shall be based on the actual expenses incurred, plus a reasonable sum for overhead and supervision.

- Rejected work shall be remedied or removed by the subdivider. Any work beyond the lines and grades shown on the plans and not approved by the City Engineer may be ordered removed at the subdivider's expense.

- The City Engineer or his authorized representative shall at all times have access to the work during construction and shall be furnished with every reasonable facility for ascertaining that materials used and employed and the workmanship are in accordance with the requirements and intentions of these specifications. Work done and materials furnished shall be subject to his inspection and approval. Materials found unsuitable may be rejected and must be removed from the project.

- Underground utilities installed in streets or alleys shall be installed prior to surfacing of said streets or alleys. Service connections shall be laid to such length as will obviate the necessity for disturbing the street or alley improvements when service connections are completed.

- The subdivider shall direct his engineer to furnish the City one complete set of improvement plans on reproducible paper after completion of improvements. These plans shall show any corrections as to location or grade or improvements or "No Corrections," whichever is applicable. Said plans shall be marked "AS BUILT," and submitted to the Development Services Department prior to acceptance of improvements by the City Council.

The Improvements made in the City must conform to the specifications and standards adopted by the City Council. Offsite requirements are discussed in the next section on fees and exactions. Chapter 1 of the Title 11, Subdivisions Code, identifies the following specifications for lot line adjustments:

Definition: A lot line adjustment is any division of land not requiring a map as specified by the Subdivision Map Act, in which no more parcels are created by the division than existed prior to it. Section 11-1-5 (D) provides definition and action required by the City Council.

Application: Any person desiring a lot line adjustment shall complete an application for a lot line adjustment and supply all the data required therein.

APPROVAL

a. The City Council may approve the lot line adjustment when it finds that:

- The lot line adjustment does not violate existing codes and policies;

- The lot line adjustment will not create difficult or unreasonable access to parcels;

- The lot line adjustment would not require variances to permit standard development;

- Utilities and public services can be provided to the revised parcels.

b. If the City Council approves the lot line adjustment, a resolution shall be passed approving said adjustment and authorizing the execution and recordation of the lot line agreement.

ANNEXATION PROCESS AND TIMELINES

Annexation of land to the City of Riverbank requires an application to the Stanislaus County Local Agency Formation Commission (Stanislaus LAFCo). All affected public agencies (municipalities, school districts, and other special districts) must be notified of the annexation application. The City must also provide evidence of how the lands to be annexed will be provided with water, sewer, and other services.

Annexations are subject to the California Environmental Quality Act (CEQA). An Initial Study and identification of potentially significant adverse impacts must be prepared. The City must then prepare either a Negative Declaration (no adverse impacts), a Mitigated Negative Declaration (adverse impacts mitigated to less than significant), or an Environmental Impact Report (EIR).

Annexations to accommodate residential development or bring existing development into the City normally do not take more than six months, while most would take three to four months. If a subdivision map or any other entitlement process is associated with annexation proceedings, it would occur concurrently to expedite the process.

USE PERMIT PROCESS

A use permit (conditional use permit) requires an application to the Planning Commission and public hearing by the Commission. To grant a use permit, the Planning Commission must find that the establishment, maintenance or operation of the use or building applied for will not, under the circumstances of the particular case, be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the city.

The Planning Commission may designate such conditions in connection with the use permit as it deems necessary to secure the purpose of this title and may require such guarantees and evidence that such conditions are being or will be complied with.

If the applicant or any other person is not satisfied with the actions of the Planning Commission, that individual may, within ten days, appeal the Planning Commission decision in writing to the City Council.

As noted above, use permits can be approved fairly quickly once a completed application has been submitted. The use permit process, by itself, is not a significant constraint to the provision of housing or shelter for special needs groups.

SITE PLAN REVIEW PROCESS

Site plan review requires an application to the Planning Commission and public hearing by the Commission. Site plan review is required for proposals to construct anything except one single-family dwelling, duplex, triplex, or four-plex on appropriately zoned property. Site plan review occurs before the Planning Commission prior to issuance of a building permit and would occur concurrently with all other Planning Commission related review of the subject project. Therefore, site plan review does not add significant time to the approval process when other discretionary approvals are required.

Staff makes every attempt to work closely with project applicants from project conception to completion in order to increase the likelihood of a favorable project recommendation to the Planning Commission. Initial submittals are highly encouraged and generally contribute to the successful approval of the project. More than 90% of projects that receive a favorable staff recommendation go on to be approved by the Planning Commission.

APPENDIX D

ZONING DISTRICTS SUMMARY AND COMPARISONS TO LAND USE DESIGNATIONS

APPENDIX D
Zoning Districts Summary and Comparisons to Land Use Designations

Three tables: D-1, D-2 and D-3 provide an analysis of zone districts and residential uses either permitted by right or by a conditional use permit.

Table D-1 – Development Standard for each residential zone district.

Table D-2 – Density Comparison between residential zone districts and the General Plan land use density.

Table D-3 – Zoning District Comparison to land use designation: residential density clearly identifies that the Zoning Ordinance allows, whether by right or by conditional use permit, multi-family units from the R-2 district to the CM district.

TABLE D-1
Residential Types Permitted by Zone

	R-1 SINGLE-FAMILY ZONE DISTRICT		R-2 DUPLEX RESIDENTIAL ZONE DISTRICT		R-3 MULTIPLE-FAMILY ZONE DISTRICT		CX-1 MIXED USE DISTRICT		C-1 NEIGHBORHOOD COMMERCIAL ZONE DISTRICT		C-2 GENERAL COMMERCIAL ZONE DISTRICT		CM COMMERCIAL INDUSTRIAL ZONE DISTRICT		M-1 INDUSTRIAL ZONE DISTRICT		M-2 HEAVY INDUSTRIAL ZONE DISTRICT	
TYPE OF RESIDENTIAL	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT	BY RIGHT	USE PERMIT
SINGLE FAMILY	X		X		X		X[2]			X				X[1]		X[1]		X[1]
MOBILE HOME	X		X		X													
CORNER LOT DUPLEX	X		X		X		X[2]			X								
ACCESSORY DWELLING UNIT	X		X		X													
MULTI-FAMILY					X		X[2]			X		X		X				
TINY HOUSE VILLAGE	X		X		X		X											
MOBILE HOME PARK		X		X		X				X		X						
FAMILY DAY CARE (6)	X		X		X													
FAMILY DAY CARE (7-12)	X		X		X													
RESIDENTIAL CARE HOME (6)	X		X		X													
RESIDENTIAL CARE HOME (7<)						X				X		X						
HOTELS						X		X	X	X	X		X					
ROOMING/ BOARDING HOMES						X		X		X		X		X				
LABOR CAMPS						X				X		X						
EMERGENCY SHELTERS					X					X		X		X				
TRANSITIONAL HOUSING	X		X		X					X		X		X				
SUPPORTIVE HOUSING	X		X		X					X		X		X				
EMPLOYEE/FARMWORKER HOUSING	X																	

[1]Per Riverbank Municipal Code, one dwelling unit shall be permitted if specific conditions are met, including the dwelling unit is clearly secondary to the commercial use of the property, there are no other residences on the property and the dwelling unit shall not be rented or leased independently of the principal

use. For this reason, Transitional and Supportive Housing are not required to be permitted in these zoning districts as residential uses are not clearly a principle use in the zone.

[2]Living units are located above the ground floor of a commercial uses or adjacent to commercial on the same property.

TABLE D-2
Development Standards for Residential by Zone

DEVELOPMENT STANDARDS	R-1 SINGLE-FAMILY	R-2 DUPLEX	R-3 MULTI-FAMILY ZONE	CX-1 MIXED USE DISTRICT	C-1 NEIGHBORHOOD COMMERCIAL	C-2 GENERAL COMMERCIAL	CM COMMERCIAL INDUSTRIAL	M-1 LIGHT INDUSTRIAL	M-2 HEAVY INDUSTRIAL
LOT SIZE 6000 S.F.	X	X							
6000 S.F. FOR 1ST/2ND UNITS, THEN 2000 S.F. PER UNIT			X		X	X	X		
NOT SPECIFIED				X				X	X
LOT COVERAGE 50%	X	X							
60%			X						
DENSITY PER NET ACRE 8 DU	X			X					
12 DU		X							
~~20~~ 16+ DU			X	X	X	X	X		
DENSITY BONUS PERMITTED (PER STATE LAW)	X	X	X	X	X	X	X		
PARKING RATIO PER UNIT	2	~~2~~1 – 2 ½	1 – 2 ½~~2~~	1	2	2	2		

TABLE D-3
Zoning District Comparison to Land Use Designation – Residential Density

ZONE DISTRICT	LOW TO MEDIUM DENSITY RESIDENTIAL (0-12 UNITS/NET ACRE)	MEDIUM TO HIGH DENSITY RESIDENTIAL (0-20 UNITS/NET ACRE)	COMMERCIAL (C-1, C-2, CM)	INDUSTRIAL (M-1, M-2)
R-1	X	X	X	
R-2	X	X	X	
R-3		X	X	
CX-1	X	X		
C-1		X		
C-2		X		
C-M		X		
M-1				X
M-2				X

Other Development Standards

The City's development standards do not unduly constrain housing or restrict the ability of affordable housing providers to construct housing for very low- or low-income households. Yard, setback, and open space requirements are generally modest. Height limits are reasonable to achieve permitted densities in the City's residential zones. The City's parking requirements for multifamily housing (two parking spaces per unit) could pose a constraint to the construction of affordable housing for lower-income seniors, persons with disabilities, and small households. A program to allow for reduced parking for studio, one-bedroom, and small two-bedroom units in affordable housing developments could address this constraint.

The City's development standards are summarized below.

Yards and Open Space:

Single-Family Residential District R-1 Zone

- Front yard – 10 feet minimum
- Interior Lot: Side, rear yard – five feet
- Corner Lot:: Front and side yards – 15 feet minimum; portions with vehicle opening – 20 feet minimum toward which the opening faces

Duplex Residential District R-2 Zone

- Front yard – 15 feet minimum
- Interior Lot: Side, rear yard – five feet
- Corner Lot:: Front and side yards – 15 feet minimum; portions with vehicle opening – 20 feet minimum toward which the opening faces
- All multiple residential uses of two or more dwelling units on one lot require a fenced open space of at least 50 square feet per unit with a minimum area of 300 square feet. This area shall have a width to depth ratio not exceeding one to two (1:2). Except in very large complexes (more than 50 units) this required open space shall be in one location.

Multiple-Family Residential District R-3 Zone

- For single-family dwellings, duplexes and triplexes in this zone, setbacks are the same as in R-2.
- For other than the aforementioned three types of residential structures, the minimum setback of a building adjacent to a public right-of-way shall be 15 feet and shall be determined by a 60° vertical angle beginning at the edge of the right-of-way and extending onto the property.
- For other than the aforementioned three types of residential structures, setbacks for buildings adjacent to residential districts is 25 feet minimum, measured as 60° vertical angle beginning at the property line and extending onto the property.
- A landscaping plan is required for all proposed land uses except single-family dwellings, duplexes, and triplexes to be approved administratively the Building and Planning Manager.

Building Height:

Single-Family Residential District R-1 Zone and Duplex Residential District R-2 Zone

- 35 feet maximum (dwellings and other main buildings)
- 15 feet maximum (accessory buildings)
- Building height does not limit the number of stories.

Multiple-Family Residential District R-3 Zone

- Three stories maximum but in no case to exceed 45 feet (dwellings and other main buildings)
- 15 feet maximum (accessory buildings)

The City's setback and height standards are typical of other communities similar to Riverbank and do not pose any strenuous constraints to affordable housing development.

Parking:

Single-family (including manufactured):	Two-car garage, minimum width of 18 feet and depth of 19 feet six inches in the direction of travel. No appliance or other objects may intrude into the garage space area.
Single-family/manufactured FmHA:	(housing financed through FmHA) One 1-car garage and one additional off-street parking space which may be located adjacent to the driveway.
Multiple-dwelling:	Zero to one bedroom – One onsite parking space; Two to three bedrooms – one and one half onsite parking spaces; and Four or more bedrooms – Two and one half onsite parking spaces ~~Two spaces per unit covered or uncovered.~~
Rooming or boarding house:	One space per every 300 square feet of ground floor area. Spaces inside a garage may be counted toward meeting the requirement.
Mobile Home Parks:	Two spaces per home plus one visitor parking space per every five mobile home spaces. Excluding visitor parking, the spaces may be constructed in tandem.

These parking standards are typical when compared to most cities in California and do not pose any strenuous constraints to affordable housing development. In 2015, the City established parking standards for mixed use developments, including allowing for off-site and shared parking as a means to reduce the overall number of parking spaces required per unit. Commercial and Residential uses may share parking which will assist in the reduction of the parking area as a whole. ~~However, with only one (1) standard for multi-family sites at two (2) spaces per unit, smaller multi-family projects may be negatively impacted by this requirement. As such,~~ Program 3.1d ~~has been to the~~from the 2014-2023 Housing Element ~~for the City to~~

~~review and amend the zoning code to~~was completed which reduced the parking standards for multi-family projects in the R-2 and R-3 zone as follows

- Zero to one (1) bedroom: one onsite parking space;
- Two to three bedrooms: one in a half parking spaces; and
- Four or more bedrooms: two and one half onsite parking spaces.

Per Program 3.1d, ~~T~~the City shall provide this information at the planning counter, on the City's website and in other public spaces to increase awareness. In addition, the City will review the Zoning Code annually to determine if any amendments need to be made to the Parking standards for multi-family and special housing, to reduce constraints to multi-family housing development.

APPENDIX E
EXACTIONS AND PROCESSING FEES

APPENDIX E
Exactions and Processing Fees

FEES, EXACTIONS AND PROCESSING

The City of Riverbank Public Facilities Fees identifies the fee basis and structure as applied to new construction.

A public facilities fee will be charged and paid at the time of issuance of a building permit for development. If a Mello-Roos District, assessment district, or other arrangement of such a nature has been made, only the portion of the fee applicable to the project may be adjusted by staff. The fee will be determined by the fee schedule in effect on the date the permit is issued.

The amount of the public facility fee will be adjusted from time to time. The availability of other funds, such as Mello-Roos and direct developer payment to construct projects included in the City of Riverbank Public Facility Plan may also affect the amount of fees to be paid.

Exemptions: The public facilities fees shall not be imposed on any of the following:

- Any alteration or addition to a residential structure, except to the extent that additional dwelling units are created.
- Any alteration or addition to a specific nonresidential structure if the square footage of the structure is increased less than ten percent, unless the alteration or addition changes the use of the structure to a higher density category or will result in the generation of additional peak hour trip ends.
- Any replacement or reconstruction of any residential, commercial or industrial development project that is damage or destroyed as a result of a natural disaster as declared by the Governor.
- Any replacement of existing structures, in kind, if the applicant can prove that the structure of facility legally existed before the ordinance was effective.
- Any replacement, in kind, or structures damaged by fire, flooding, earthquake, etc.

The fees for the City of Riverbank are shown in Table E-1. The following application fee schedule applies to both Single-Family Dwellings and Multiple-Family Developments.

TABLE E-1
Application Fee Schedule – 2022
Resolution No. 2014-063

APPLICATION TYPE	FEE/DEPOSIT	FOOTNOTES
ANNEXATION APPLICATION – • ANNEXATION	$ 4,000.00 DEPOSIT	1,2,3,5,6,7
APPEAL	$1,000.00 FEE	*5
ARCHITECTURE AND SITE PLAN REVIEW	$1,000.00 FEE	*5
CERTIFICATE OF COMPLIANCE	$158.25	*5
CONDITIONAL USE PERMIT	$2,000.00 FEE	*2,5
CELLULAR TOWERS/ANTENNAS - • ADMINISTRATIVE APPROVAL • CONDITIONAL USE PERMIT REQUIRED • LEASE AGREEMENT NOTE: APPLICANT TO PAY FULL COST OF PROCESSING AN APPLICATION	$930.62 DEPOSIT $1,094.11 DEPOSIT $2,189.27 DEPOSIT	*2,5
DEVELOPMENT AGREEMENT - ANNUAL REVIEW OF DEVELOPMENT AGREEMENT	$ 2,000.00 DEPOSIT	*2,4,5
DEPOSIT FOR CITY ATTORNEY	$547.06	*2
DEPOSIT FOR CITY ENGINEER	$547.06	*2
ENVIRONMENTAL REVIEW • NEGATIVE DECLARATION • NEGATIVE DECLARATION WITH MMRP • ENVIRONMENTAL IMPACT REPORT • **FISH AND GAME ENVIRONMENTAL FEES – WHICHEVER APPLIES TO YOUR APPLICATION. CHECK SHALL BE PAYABLE TO COUNTY CLERK RECORDER**	$2,000.00 DEPOSIT $2,000.00 DEPOSIT ACTUAL COST + DEPOSIT **$57.00** **$57 AND $1,966.83 OR $57 AND $2,731.87**	*2,5,8
FILE MAINTENANCE - • COMMUNITY DEVELOPMENT DEPARTMENT FILE MAINTENANCE • CITY CLERK FILE MAINTENANCE • GENERAL PLAN MAP OR ZONING MAP OR BASE MAP MAINTENANCE	$54.50 $9.43 $ 657.10	
EXCEPTION TO SUBDIVISION STANDARDS	$497.80	*2,5
GENERAL PLAN AMENDMENT	$ 2,000.00 DEPOSIT	*1,2,5,6,7
LANDSCAPE REVIEW	$547.05	
LOT LINE ADJUSTMENT	$500.00 PER LLA	*2,5,9
PARCEL MAP - • TENTATIVE PARCEL MAP	$2,000.00 DEPOSIT	*1,2,5,6,7
SUBDIVISION MAP – • TENTATIVE SUBDIVISION MAP	$2,000.00 DEPOSIT	*1,2,5,6,7
TEMPORARY MOBILEHOME PERMIT - • APPLICATION • PERMIT RENEWAL	$273.53 $98.51	*5
TIME EXTENSION - • TIME EXTENSION – OTHER (PD, PM, TM, CUP, ETC)	$1,500.00 FEE	*1,2,5

VARIANCE	$1,500.00 FEE	*1,2,5
ZONE CHANGE - • ZONE CHANGE TO OTHER ZONE DESIGNATION	$2,000.00 DEPOSIT	*1,2,5,6,7
ZONING ORDINANCE TEXT AMENDMENT	$1,051.14	*1,2,5
OTHER SERVICES- POST PLANNING APPLICATION PROJECT CONSULTATION RESEARCH FEE REQUIRING EXTENSIVE STAFF TIME	 PUBLISHED RATES PUBLISHED RATES	 10

Footnotes

1. Applicant may be required to provide a **traffic study** of impacts on roads.
2. Applicant must also pay City Attorney and City Engineering fees on an "at cost" basis.
3. Applicant must also pay the following: **a]** all election costs if one is necessary; **b]** LAFCO/State Board of Equalization filing fees; **c]** maps/legal descriptions that comply with LAFCO/State Board of Equalization Standards; **d]** $295 if protest hearing is required.
4. Deposit of $2,000 to cover costs of establishing Development Agreement. Upon adoption of Development Agreement, applicant shall deposit an additional $2,089 to annual review. If deposit exceeds charges of review, applicant will be required to provide additional funds.
5. Applicant shall be required to pay a "file maintenance fee" (Community Development Department, City Clerk Files)
6. Applicant shall pay General Map Maintenance Fee
7. Applicant shall pay Zoning Map Maintenance Fee
8. All Environmental Assessments shall comply with Riverbank's Municipal Code Section 32.79
9. $500/00 Per Lot Line Adjusted, not per LLA Application
10. The Community Development Director shall determine the appropriate fee based on the staff time involved in the service or activity

Preliminary Fee Deposit; does not include contract/consultant service costs and indirect costs.
The City Manager or Community Development Director may require a deposit or cost recovery agreement, based on the city's estimate of the overall processing costs related to the application. If a deposit is required, the application shall not be deemed complete until the applicant provides the deposit, in cash or check, to the city.

The City of Riverbank adopted the following fees in addition to fees stated above:

2024 SYSTEM DEVELOPMENT FEES

Land Use Category	Water	Sewer	Storm Drainage	Parks and Rec	Gen. Government	Traffic(1)
Residential (Fee per Unit)						
Clustered Rural (RR)	$18,927	$7,050	$10,711	$4,830	$1,749	$4,983
Lower Density (LDR)	$9,858	$4,298	$9,714	$5,490	$1,988	$4,186
Medium Density (MDR)	$9,463	$3,591	$3,921	$4,705	$1,702	$3,688
Higher Density (HDR)	$6,861	$4,408	$4,426	$3,921	$1,418	$3,139
Mixed Use (Residential) (MU)	$6,861	$1,334	$2,864	$3,422	$1,239	$4,983
Non-Residential (Fee per KSF)(2)						
Community Commercial (CC)	$2,900	$2,320	$5,970	-	$520	$7,810
Mixed Use (Commercial) (MU)	$2,920	$2,330	$5,930	-	$520	$8,120
Industrial/Business Park (I/BP)	$2,890	$1,970	$5,840	-	$380	$8,080
Office (MU)	$2,850	$1,820	$5,720	-	$720	$8,080

(1) Higher Density includes HDR and MU, Commercial includes CC and MU.
(2) KSF = per 1,000 square feet of building space

STANISLAUS COUNTY DEVELOPMENT FEES

The City of Riverbank has entered into an inter-agency agreement with Stanislaus County to collect the Stanislaus County Development Fees. The following fee schedule was effective October 10, 2020.

SINGLE-FAMILY	MULTI-FAMILY	SENIOR HOUSING	ACCESSORY DWELLING UNIT – OVER 750 SQ. FT.
$7,190.00/UNIT	$4,746.00/UNIT	$5,032.00/UNIT	$2,124.00/UNIT

The following table identifies the hypothetical fees that would be collected for a new 1,500 square foot plan with a 400 square foot garage and a 150 square foot patio and a valuation of $193,521.50. These fees would be approximately $47,351.00 for a Single-Family Dwelling and $32,678.00 for a Multifamily Unit, with the following fee breakdown:

- City of Riverbank System Development Fee (per unit): $37,311 SFD (LDR); $25,382 MF (HDR)
- Stanislaus County System Development Fee (per unit): $7,190.00 SFD; $4,746.00 MF
- Permit fees (per unit): $2,850.00 SFD/MF
- Application fees (per development): $0.00 SFD and $3,000.00 (Arch and Site Plan Review and IS/Negative Declaration) MF
- Land Costs: $125,000.00 for a finished lot

This represents about 27.4 percent of the total development cost for a single-family unit and 20.3 percent for a multifamily unit.

PROPORTION OF FEES IN OVERALL DEVELOPMENT COST FOR A TYPICAL RESIDENTIAL DEVELOPMENT

Development Cost for Typical Unit	New Single-Family	New Multifamily
Total estimated fees per unit	$47,351.00	$32,678.00 (+ $3,000 per development)
Typical estimated cost of development per unit	$172,351.00	$160,678.00
Estimated proportion of fee cost to overall development cost per unit	27.4%	20.3%

APPENDIX F
OVERPAYMENT CALCULATION

APPENDIX F
Overpayment Calculation
For Very Low- and Lower Income Owner and Rental Households Overpaying for Housing – 2024

STANISLAUS COUNTY - 2024	
Median Household Income in Stanislaus County	$92,600
Lower Income Households: Those at or below 80% of the Median Income	$72,900
Overpayment: Total Lower Income Owner & Renter Households paying more than 30% of Household Income for Housing Costs.	> $21,870 (>$1,822/month)
Severe Overpayment: Total Lower Income Owner & Renter Households paying more than 50% of Household Income for Housing Costs.	> 36,450 (>$3,037/month)

SOURCE: HCD 2024 State Income Limits, 2024.

CITY OF RIVERBANK - 2013	
Median Household Income in Riverbank	$59,925
Lower Income Households: Those at or below 80% of the Median Income	$47,940
Overpayment: Total Lower Income Owner & Renter Households paying more than 30% of Household Income for Housing Costs.	> $14,382 (>$1,198/month)
Severe Overpayment: Total Lower Income Owner & Renter Households paying more than 50% of Household Income for Housing Costs.	> $23,970 (>$1,997/month)

SOURCE: U.S. Census Bureau, 2011-2013 American Community Survey, B19013: Median Household Income

SPECIFIED RENTER HOUSING UNITS, CITY OF RIVERBANK – 2013

HOUSEHOLD INCOME BY GROSS RENT AS A PERCENT OF INCOME							
Rents as % of Income	**< 20%**	**20 – 24%**	**25 – 29%**	**30 – 34%**	**35% +**	**Not Computed**	**Total**
< $10,000	0	0	4	0	248	89	337
$10,000 - $19,999	0	6	24	31	86	26	173
$20,000 - $34,999	0	0	22	22	230	0	274
$35,000 - $49,999	0	31	33	39	94	3	200
$50,000 – $74,999	58	52	72	36	78	12	308
$75,000 - $99,999	88	109	81	19	7	10	314
$100,000 +	492	68	68	4	0	4	636
							2,242

SOURCE: U.S. Census Bureau, 2022 American Community Survey, Table B25074, Household Income by Gross Rent as a Percentage of Household Income in the Past 12 Months

SPECIFIED OWNER HOUSING UNITS, CITY OF RIVERBANK – 2013

HOUSEHOLD INCOME BY SELECTED MONTHLY OWNER COSTS AS A PERCENT OF INCOME				
Owner Costs as % of Income	**Less than 30%**	**30% or More**	**Not Computed**	**Total**
< $20,000	0	48	N/A	48
$20,000 - $34,999	0	206	N/A	206
$35,000 - $49,999	0	185	N/A	185
$50,000 – $74,999	115	311	N/A	426
$75,000 +	2,476	397	N/A	2,873
				3,760

***SOURCE**:* U.S. Census Bureau, 2022 American Community Survey, Table C2506: Financial Characteristics for Housing Units with a Mortgage, Monthly Housing Costs as a Percentage of Household Income in the Past 12 Months

CALCULATIONS FOR TOTAL LOW INCOME HOUSEHOLDS OVERPAYING		
	RENTERS	*OWNERS*
Step 1: Number of Low Income Households with Incomes Between 0 and $34,999 Overpaying	617	254
Step 2: All households in $35,000 to $49,999 Income Range Overpaying	200	185
Step 3A: Difference between Upper figures in $35-$49,999 range and 0-$34,999 range	$15,000	$15,000
Step 3B: Difference between Low Income Limits and Upper figure in 0-$34,999 range	$12,941	$12,941
Step 3C: Proportion of Income Range below the Low Income Limits	0.049	0.049
Step 3D: Multiply all Households in the $35,000-$49,999 Income Range by the proportion in Step 3C	22.54	28.52
Step 4: Total Number	867	692

APPENDIX G
PUBLIC PARTICIPATION

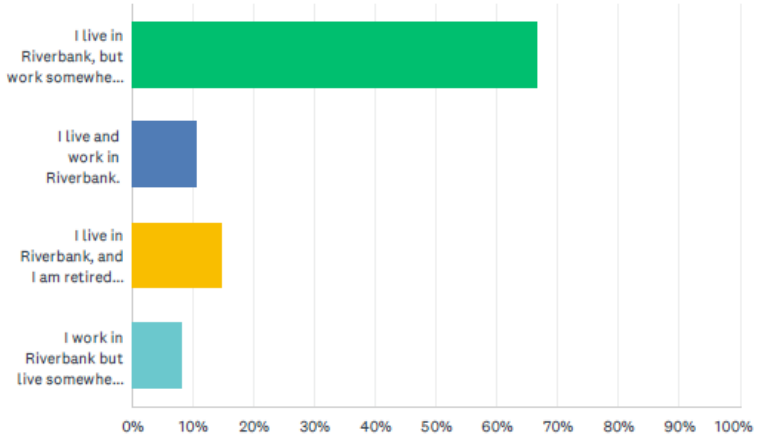
APPENDIX G
Public Participation

A. ONLINE COMMUNITY SURVEY

As noted in Section I, *Introduction*, the City launched a Housing Survey on June 21, 2024 requesting feedback on the state of local housing. The Housing Survey remained open until August 13, 2024. The Housing Survey was made available in English and Spanish. The results of the Housing Survey are as follows:

Q1 Do you live and/or work in the City of Riverbank?

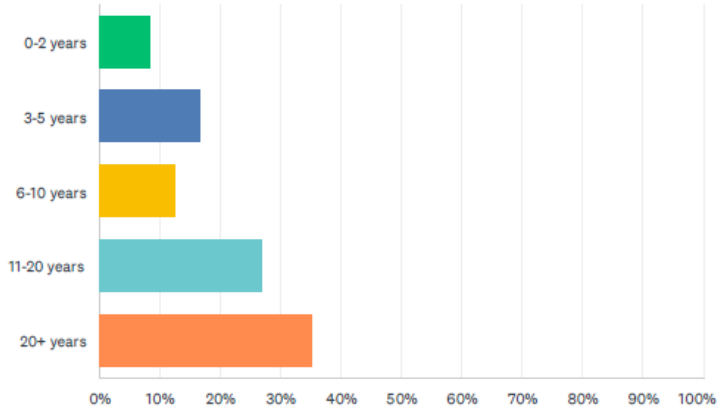
Answered: 75 Skipped: 0



ANSWER CHOICES	RESPONSES	
I live in Riverbank, but work somewhere else	66.67%	50
I live and work in Riverbank.	10.67%	8
I live in Riverbank, and I am retired/do not currently work.	14.67%	11
I work in Riverbank but live somewhere else.	8.00%	6
TOTAL		75

Q2 If you live in Riverbank, how long have you lived in the City?

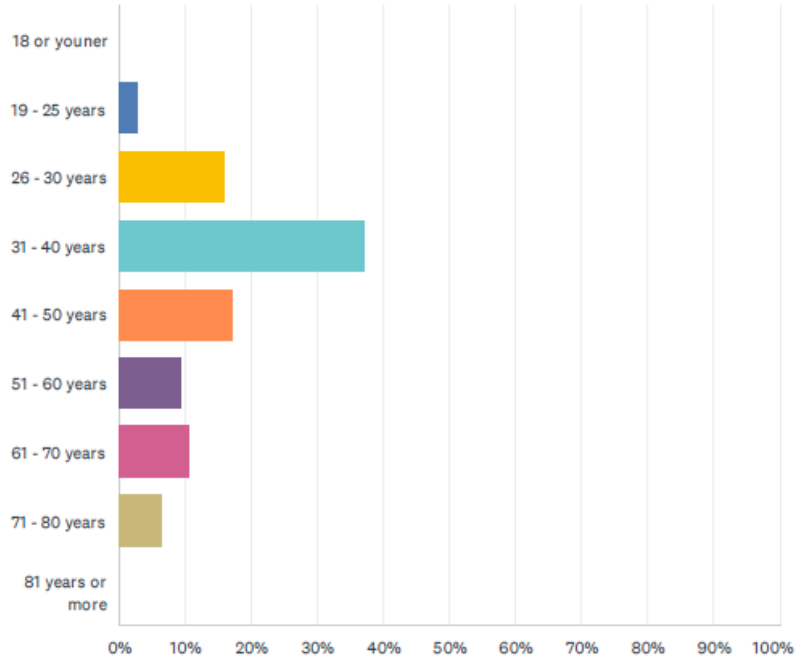
Answered: 71 Skipped: 4



ANSWER CHOICES	RESPONSES	
0-2 years	8.45%	6
3-5 years	16.90%	12
6-10 years	12.68%	9
11-20 years	26.76%	19
20+ years	35.21%	25
TOTAL		71

Q3 How old are you?

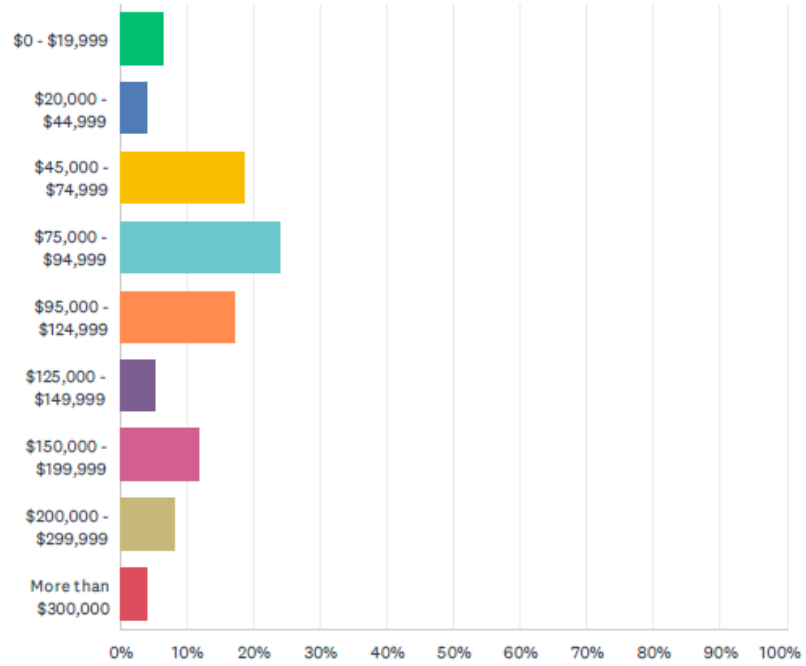
Answered: 75 Skipped: 0



ANSWER CHOICES	RESPONSES	
18 or youner	0.00%	0
19 - 25 years	2.67%	2
26 - 30 years	16.00%	12
31 - 40 years	37.33%	28
41 - 50 years	17.33%	13
51 - 60 years	9.33%	7
61 - 70 years	10.67%	8
71 - 80 years	6.67%	5
81 years or more	0.00%	0
TOTAL		75

Q4 What best describes your annual household income level?

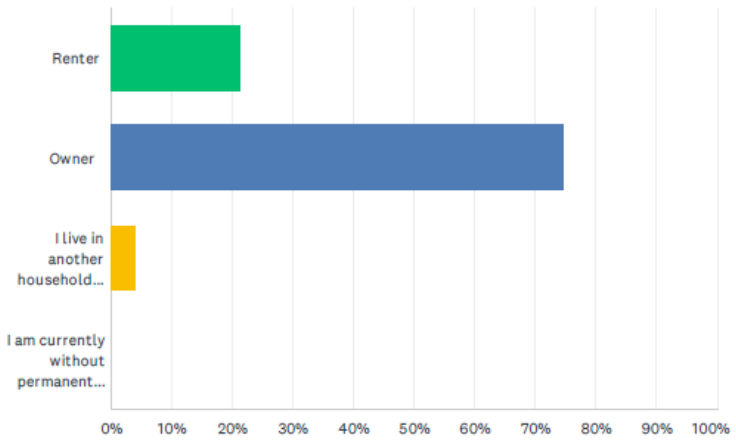
Answered: 75 Skipped: 0



ANSWER CHOICES	RESPONSES	
$0 - $19,999	6.67%	5
$20,000 - $44,999	4.00%	3
$45,000 - $74,999	18.67%	14
$75,000 - $94,999	24.00%	18
$95,000 - $124,999	17.33%	13
$125,000 - $149,999	5.33%	4
$150,000 - $199,999	12.00%	9
$200,000 - $299,999	8.00%	6
More than $300,000	4.00%	3
TOTAL		75

Q6 Are you a renter or owner?

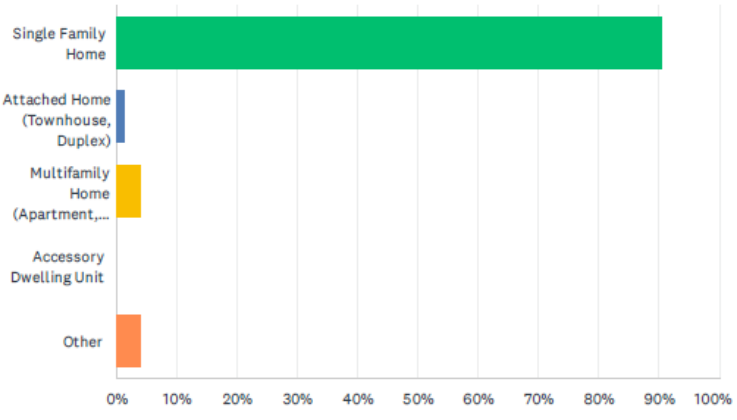
Answered: 75 Skipped: 0



ANSWER CHOICES	RESPONSES	
Renter	21.33%	16
Owner	74.67%	56
I live in another household (neither own nor rent).	4.00%	3
I am currently without permanent shelter.	0.00%	0
TOTAL		75

Q5 Select the type of housing you reside in.

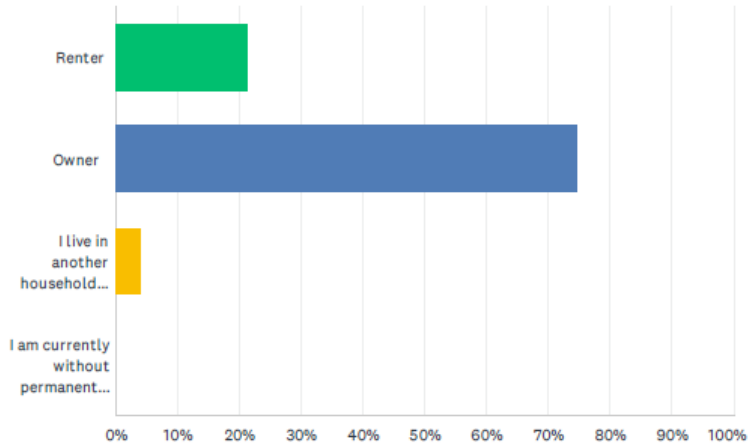
Answered: 75 Skipped: 0



ANSWER CHOICES	RESPONSES	
Single Family Home	90.67%	68
Attached Home (Townhouse, Duplex)	1.33%	1
Multifamily Home (Apartment, Condominium)	4.00%	3
Accessory Dwelling Unit	0.00%	0
Other	4.00%	3
TOTAL		75

Q6 Are you a renter or owner?

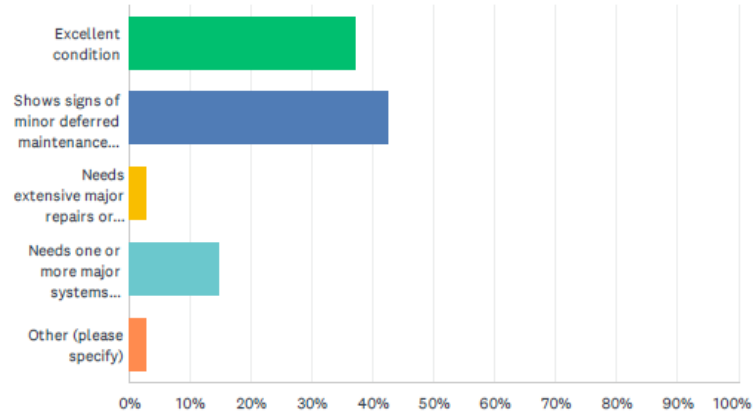
Answered: 75 Skipped: 0



ANSWER CHOICES	RESPONSES	
Renter	21.33%	16
Owner	74.67%	56
I live in another household (neither own nor rent).	4.00%	3
I am currently without permanent shelter.	0.00%	0
TOTAL		75

Q7 How would you rate the physical condition of the residence you live in?

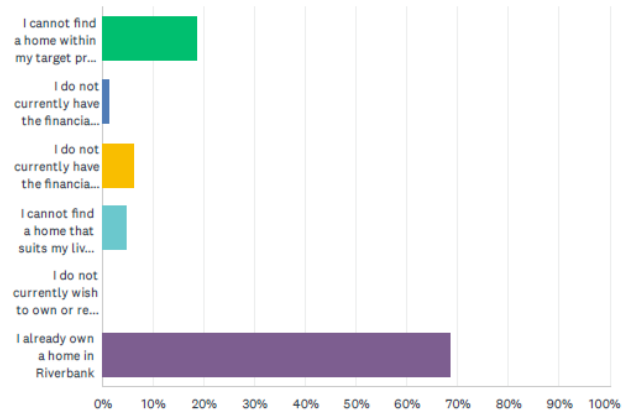
Answered: 75 Skipped: 0



ANSWER CHOICES	RESPONSES	
Excellent condition	37.33%	28
Shows signs of minor deferred maintenance (e.g., peeling paint, chipped stucco, etc.)	42.67%	32
Needs extensive major repairs or renovations (teardown/rebuild)	2.67%	2
Needs one or more major systems upgrades (e.g., new roof, windows, electrical, plumbing, HVAC system, etc.)	14.67%	11
Other (please specify)	2.67%	2
TOTAL		75

Q8 If you do not currently own a home, what issues are preventing you from owning a home at this time?

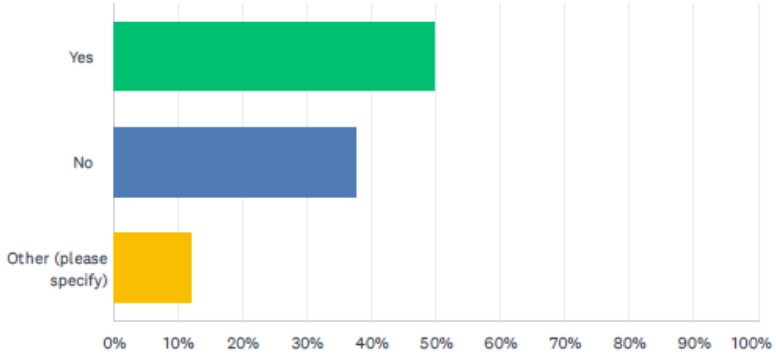
Answered: 64 Skipped: 11



ANSWER CHOICES	RESPONSES	
I cannot find a home within my target price range in Riverbank	18.75%	12
I do not currently have the financial resources for an appropriate down payment	1.56%	1
I do not currently have the financial resources for an adequate monthly mortgage payment	6.25%	4
I cannot find a home that suits my living needs in Riverbank (e.g., housing size, disability accommodations, floorplan, etc.)	4.69%	3
I do not currently wish to own or rent a home in Riverbank	0.00%	0
I already own a home in Riverbank	68.75%	44
TOTAL		64

Q9 Do you think that the range of housing options currently available in the City of Riverbank meets your needs?

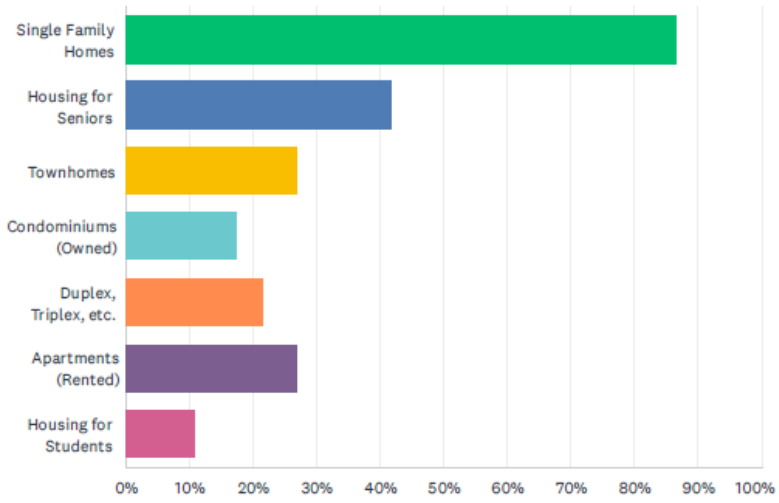
Answered: 74 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	50.00%	37
No	37.84%	28
Other (please specify)	12.16%	9
TOTAL		74

Q10 As the City plans to meet the State mandate to plan for more than 3,591 new housing units, which types of additional housing are most needed in the City of Riverbank? (Select all that apply)

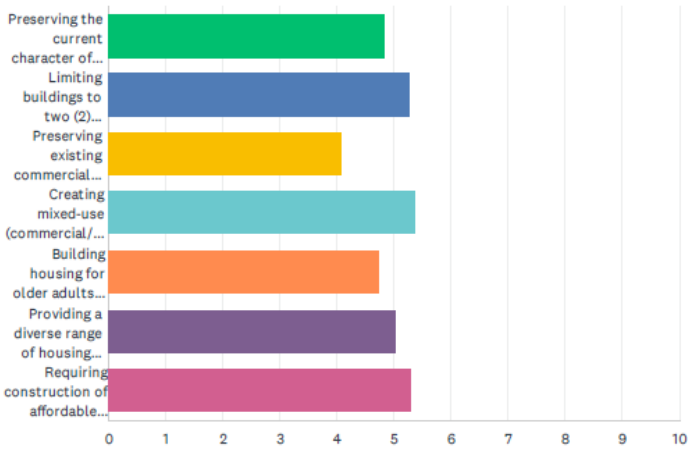
Answered: 74 Skipped: 1



ANSWER CHOICES	RESPONSES	
Single Family Homes	86.49%	64
Housing for Seniors	41.89%	31
Townhomes	27.03%	20
Condominiums (Owned)	17.57%	13
Duplex, Triplex, etc.	21.62%	16
Apartments (Rented)	27.03%	20
Housing for Students	10.81%	8
Total Respondents: 74		

Q11 Please rank the following based on how important they are to you and your family, with 1 being the most important and 10 being the least important.

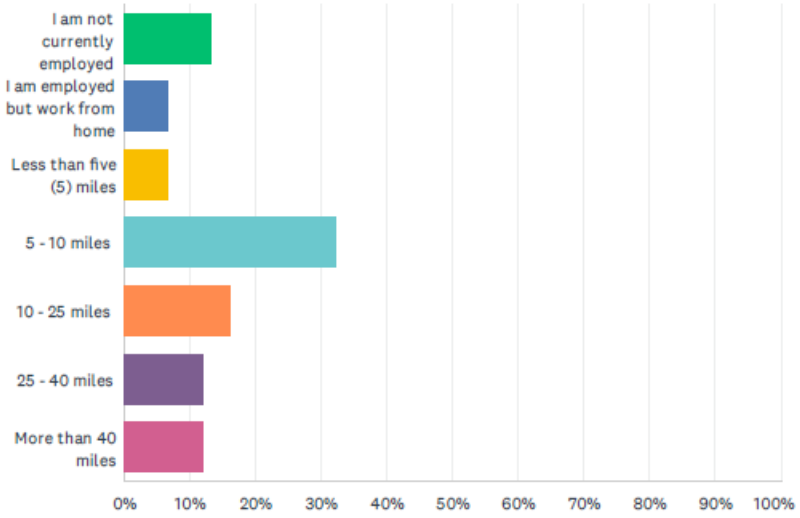
Answered: 68 Skipped: 7



ANSWER CHOICES	AVERAGE NUMBER	TOTAL NUMBER	RESPONSES
Preserving the current character of single-family neighborhoods as much as possible.	5	310	64
Limiting buildings to two (2) stories.	5	328	62
Preserving existing commercial locations, such as shopping centers with grocery stores.	4	262	64
Creating mixed-use (commercial/office and residential) projects in the community.	5	344	64
Building housing for older adults or students.	5	299	63
Providing a diverse range of housing types to meet the varied needs of people at all income levels.	5	322	64
Requiring construction of affordable units as part of housing development projects.	5	334	63
Total Respondents: 68			

Q12 If you are currently employed, approximately how long is your one-way commute to work?

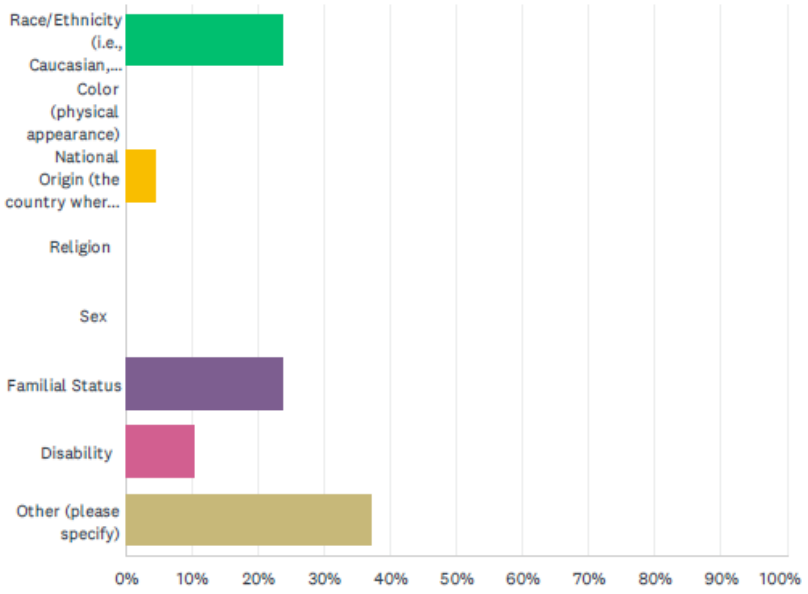
Answered: 74 Skipped: 1



ANSWER CHOICES	RESPONSES	
I am not currently employed	13.51%	10
I am employed but work from home	6.76%	5
Less than five (5) miles	6.76%	5
5 - 10 miles	32.43%	24
10 - 25 miles	16.22%	12
25 - 40 miles	12.16%	9
More than 40 miles	12.16%	9
TOTAL		74

Q13 The Federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Of those, which do you think is the biggest issue in housing discrimination in Riverbank?

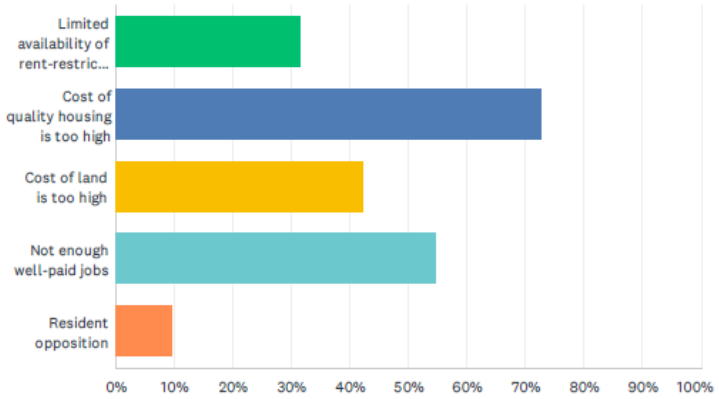
Answered: 67 Skipped: 8



ANSWER CHOICES	RESPONSES	
Race/Ethnicity (i.e., Caucasian, Asian, Latino, etc.)	23.88%	16
Color (physical appearance)	0.00%	0
National Origin (the country where a person was born)	4.48%	3
Religion	0.00%	0
Sex	0.00%	0
Familial Status	23.88%	16
Disability	10.45%	7
Other (please specify)	37.31%	25
TOTAL		67

Q14 What are the main housing challenges in Riverbank? (Select all that apply)

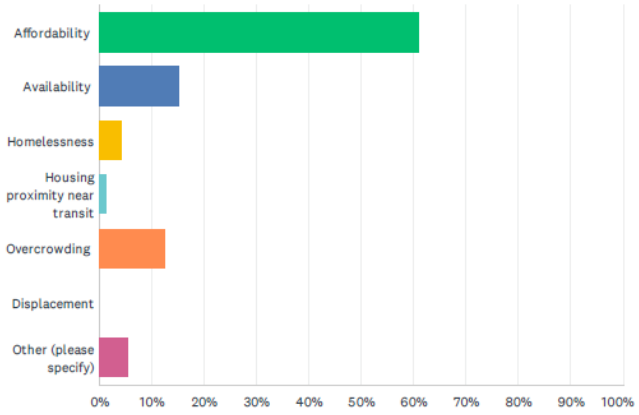
Answered: 73 Skipped: 2



ANSWER CHOICES	RESPONSES	
Limited availability of rent-restricted affordable units	31.51%	23
Cost of quality housing is too high	72.60%	53
Cost of land is too high	42.47%	31
Not enough well-paid jobs	54.79%	40
Resident opposition	9.59%	7
Total Respondents: 73		

Q15 What are the most urgent housing issues in Riverbank?

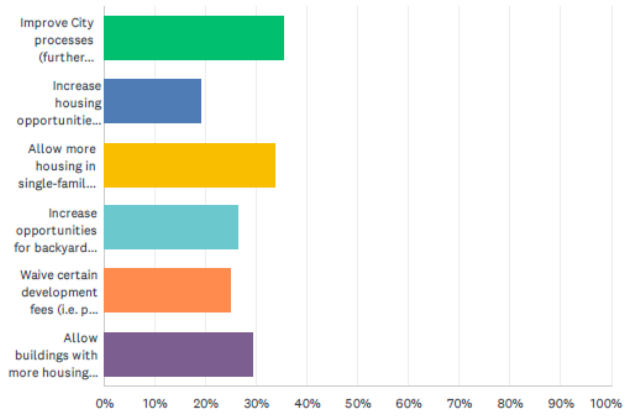
Answered: 72 Skipped: 3



ANSWER CHOICES	RESPONSES	
Affordability	61.11%	44
Availability	15.28%	11
Homelessness	4.17%	3
Housing proximity near transit	1.39%	1
Overcrowding	12.50%	9
Displacement	0.00%	0
Other (please specify)	5.56%	4
TOTAL		72

Q16 What are the best strategies to produce more housing? (Select all that apply)

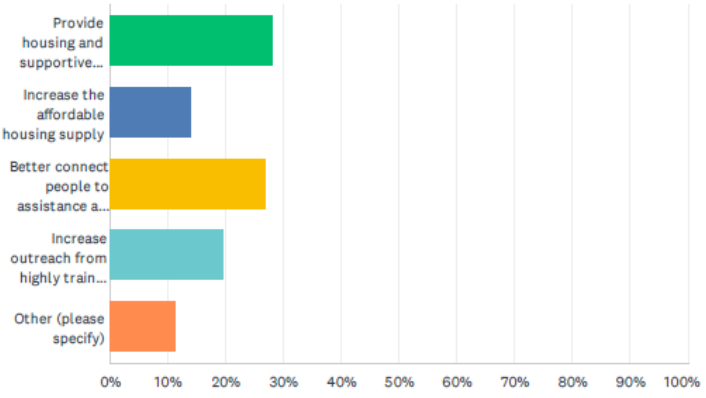
Answered: 68 Skipped: 7



ANSWER CHOICES	RESPONSES	
Improve City processes (further streamlined application process and checklists, preapplication meetings, handouts, improved website design and navigation to find needed materials, etc.)	35.29%	24
Increase housing opportunities near transit	19.12%	13
Allow more housing in single-family neighborhoods	33.82%	23
Increase opportunities for backyard units (ADUs & JADUs)	26.47%	18
Waive certain development fees (i.e. park and/or other)	25.00%	17
Allow buildings with more housing units/greater density	29.41%	20
Total Respondents: 68		

Q17 What do you believe is the best way to help people who are experiencing homelessness?

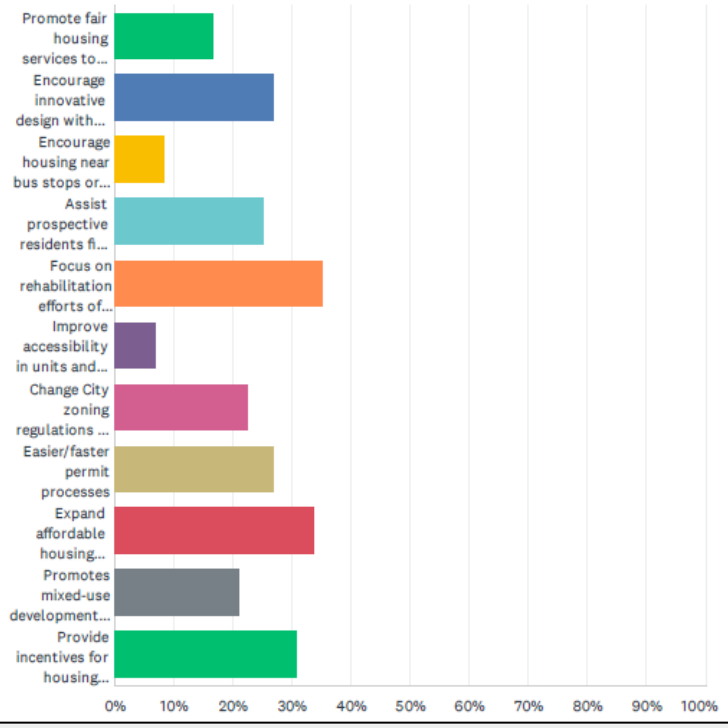
Answered: 71 Skipped: 4



ANSWER CHOICES	RESPONSES	
Provide housing and supportive services (i.e. assistance with addiction, mental health, recovery, displacement and/or more transitional/emergency housing)	28.17%	20
Increase the affordable housing supply	14.08%	10
Better connect people to assistance and services	26.76%	19
Increase outreach from highly trained specialists	19.72%	14
Other (please specify)	11.27%	8
TOTAL		71

Q18 What types of housing-related programs and/or activities do you believe Riverbank should concentrate on? (Please select all that apply)

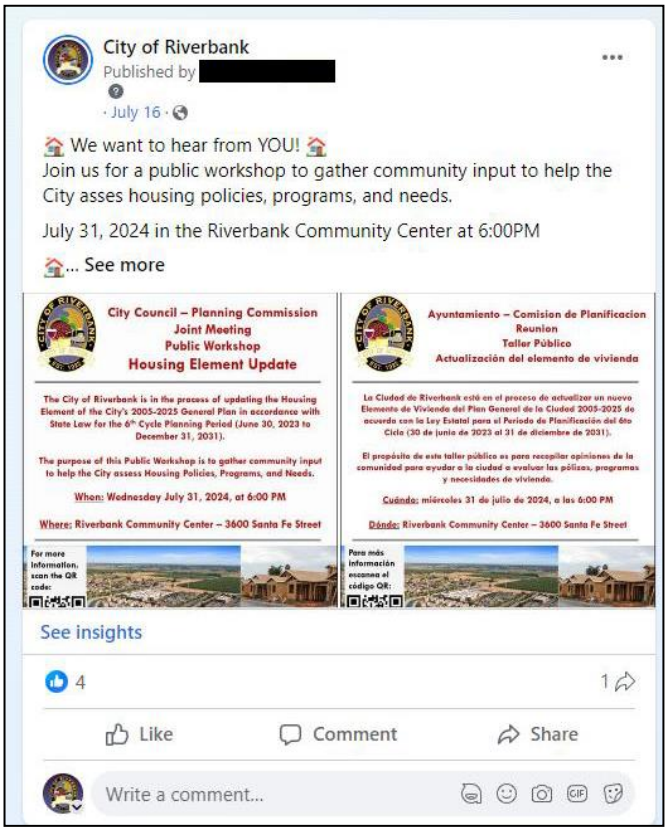
Answered: 71 Skipped: 4



ANSWER CHOICES	RESPONSES	
Promote fair housing services to address fraud, displacement, or discrimination	16.90%	12
Encourage innovative design with emphasis on community and amenities	26.76%	19
Encourage housing near bus stops or other transportation options	8.45%	6
Assist prospective residents find available housing	25.35%	18
Focus on rehabilitation efforts of existing housing	35.21%	25
Improve accessibility in units and range of accessibility features for persons with disabilities	7.04%	5
Change City zoning regulations to increase the allowable amount of housing that can be built in certain areas	22.54%	16
Easier/faster permit processes	26.76%	19
Expand affordable housing inventory through new housing projects	33.80%	24
Promotes mixed-use development with both commercial and residential components	21.13%	15
Provide incentives for housing developments that include low-income or affordable units	30.99%	22
Total Respondents: 71		

B. CITY COUNCIL-PLANNING COMMISSION PUBLIC WORKSHOP

As noted in Section I, *Introduction*, the City held a joint City Council-Planning Commission Public Workshop on July 31, 2024 at the Riverbank Community Center. Below are some of the advertisements and photographs of the Public Workshop:

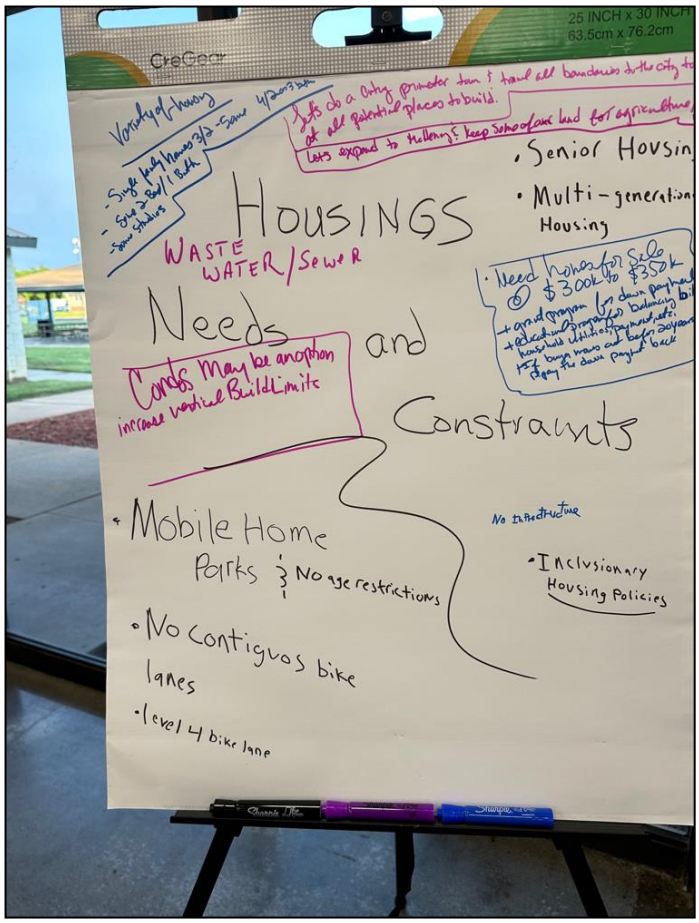


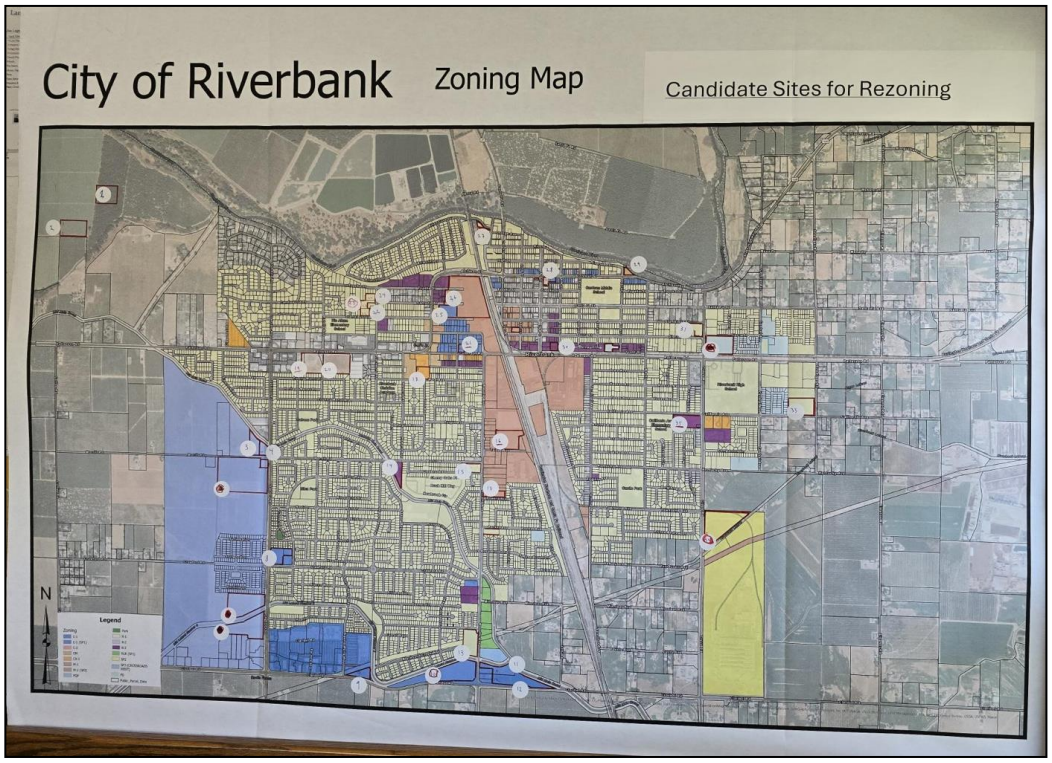
Thank you for attending the Workshop!
Gracias por asistir al taller!

Housing Element Update
Actualizar el Elemento de Vivienda

City of Riverbank Zoning Map
City of Riverbank Zoning Map
City of Riverbank Zoning Map
City of Riverbank General Plan

City of Riverbank Zoning Map
City of Riverbank Zoning Map
City of Riverbank Zoning Map
City of Riverbank


25 INCH x 30 INCH
63.5cm x 76.2cm
CreGear
Variety of housing
Single family Homes 3/4 - Same
- Sing → Dual / 1 Both
- Same Structure
Lets do a City perimeter tour & travel all boundaries to the city to
Lets expand to Hollenbeck keep some farm land for agriculture
HOUSINGS
WASTE WATER/Sewer
Needs and Constraints
Costs may be exception
increase vertical Build limits
• Senior Housing
• Multi-generation Housing
• Need homes for Sale $300k to $350k
+ grant program for down payment
+ education program for buyers
household with payment info
+ help buyer save for down payment
+ pay the down payment back
• Mobile Home Parks ; No age restrictions
No Infrastructure
• Inclusionary Housing Policies
• No Contiguous bike lanes
• Level 4 bike lane


City of Riverbank
Zoning Map
Candidate Sites for Rezoning
N
Legend

C. STAKEHOLDER MEETING

City of Riverbank
Development Services Department

Planning • Building • Code Enforcement • Public Works • Engineering

You're invited to a Housing Stakeholder's Meeting

As part of the City's Housing Element Update project, the City of Riverbank is holding a virtual/in-person stakeholders meeting with Housing industry businesses, and housing service providers. **The City of Riverbank wants to hear from you**!

As a housing industry developer, service provider and practitioner, the City is very interested in knowing your thoughts on what can be done to address one of the basic needs in our community – Housing! To this end, please join us for the...

Riverbank Housing Element Stakeholder's Meeting

Date: Wednesday, September 11, 2024
2:00-3:00 p.m.
Location: City of Riverbank City Council Chambers,
6707 3rd Street, Suite B
Riverbank, CA 95367

Zoom Link: https://us02web.zoom.us/j/87320600644?pwd=1Qn8aDZwWtfNuRVV88bMhNyaSizoFM.1

At the meeting, City staff will briefly provide an overview of the City's housing element update efforts and solicit input on housing issues from those in attendance. The forum will focus on housing issues by asking the following questions:

1. What are the top housing issues that should be addressed in City Riverbank?
2. What challenges do you face in developing housing in our community?
3. What can the City of Riverbank do to facilitate housing development?
4. What housing-related activities should the City prioritize?

If you have any questions or concerns or would like to schedule a meeting with City staff, please email: riverbankhousing@riverbank.org

APPENDIX H
SITE INVENTORY

APPENDIX H
Site Inventory

Vacant Land															
~~Assessor Parcel Number~~Site #	Assessor Parcel Number~~Site #~~	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	~~Infrastructure~~ Inf. Availability	Income Category			
Single Family Residential													~~Mod~~Very Low~~.~~	~~Above Mod.~~Low	Mod.	Above Mod.
V1	075-005-013	2531 W. Stanislaus Street	0.99	0.99	LDR	R-1	None. Site is vacant and has frontage along Stanislaus Street.	Vacant	8	~~7.92~~8	~~6~~7.43	Yes	0~~1~~AM, M	0~~6~~	1	5
~~V2~~	~~075-005-025~~	~~0 Jackson Avenue~~	~~1.08~~	~~1.08~~	~~LDR~~	~~R-1~~	~~None. Site is vacant and has frontage along Jackson Avenue.~~	~~Vacant~~	~~8~~	~~9~~8.64	~~8.10~~	~~Yes~~	~~1~~AM, M	~~7~~		
V~~2~~3	075-005-026	6719 Jackson Avenue	0.95	0.95	LDR	R-1	None. Site is vacant and has frontage along Jackson Avenue.	Vacant	8	~~8~~7.6	~~6~~7.13	Yes	0~~1~~AM, M	0~~6~~	1	5
V~~3~~4	075-017-001	5930 Terminal Avenue	0.2	0.2	LDR	R-1	None. Site is vacant and has frontage along Terminal Avenue.	Vacant	8	~~2~~1.6	~~2~~1.50	Yes	0~~1~~AM, M	0~~1~~	1	1
V~~4~~5	075-017-020	0 Kentucky Avenue	0.14	0.14	LDR	R-1	None. Site is vacant and has frontage along Kentucky Avenue.	Vacant	8	1~~.12~~	1~~.05~~	Yes	0AM, M	0~~1~~	0	1
V~~5~~6	075-039-002	0 Terminal Avenue	0.33	0.33	LDR	R-1	None. Site is vacant and has frontage along Reich Lane.	Vacant	8	~~3~~2.64	2~~.48~~	Yes	0~~1~~AM, M	0~~1~~	1	1
V~~6~~7	075-045-039	0 Roselle Avenue	1.29	1.29	LDR	R-1	Canal along the western border of the site may impact development.	Vacant	8	10~~.32~~	~~10~~89.68	Yes	0~~1~~AM, M	0~~9~~	1	7
~~V8~~	~~075-048-002~~	~~2812 River Cove Drive~~	~~0.59~~	~~0.59~~	~~LDR~~	~~R-1~~	~~None. Site is vacant and has frontage along River Cove Drive.~~	~~Vacant~~	~~8~~	~~5~~4.72	~~4.43~~	~~Yes~~	~~1~~AM, M	~~3~~		
~~V9~~	~~075-048-003~~	~~0 River Cove Drive~~	~~0.75~~	~~0.75~~	~~LDR~~	~~R-1~~	~~Site is vacant; abuts Stanislaus River which could increase costs to develop.~~	~~Vacant~~	~~8~~	~~6~~	~~5.63~~6	~~Yes~~	~~1~~	~~5~~AM, M		
V7~~10~~	075-052-044	2608 Briarcliff Drive	0.35	0.35	LDR	R-1	Site is vacant with moderate grade.	Vacant	8	~~3~~2.8	~~23~~2.63	Yes	0~~1~~	0~~2~~AM, M	1	1
V~~8~~11	075-056-031	0 Briarcliff Drive	2.09	2.09	LDR	R-1	Site is vacant with moderate grade.	Vacant	8	1~~7~~6.72	1~~46~~5.68	Yes	0~~1~~	0~~15~~AM, M	1	13
V~~9~~12	075-057-~~041~~002	0 Zellman Court	0.~~44~~14	~~0.140~~ .44	LDR	R-1	None. Site is vacant and has frontage along Zellman Court.	Vacant	8	~~4~~1.12	1~~.05~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V~~10~~13	075-057-~~003~~042	0 Zellman Court	0.12	0.12	LDR	R-1	None. Site is vacant and has frontage along Zellman Court.	Vacant	8	~~1~~0.96	~~1~~0.90	Yes	0~~0~~	0~~1~~AM, M	0	1
V~~11~~14	075-057-~~004~~043	0 Zellman Court	0.12	0.12	LDR	R-1	None. Site is vacant and has frontage along Zellman Court.	Vacant	8	~~1~~0.96	~~1~~0.90	Yes	0~~0~~	0~~1~~AM, M	0	1
V~~12~~15	075-095-008	3206 Walnut Lane	0.~~21~~14	~~0.140~~ .21	LDR	R-1	None. Site is vacant and has frontage along Walnut Lane	Vacant	8	~~2~~1.12	1~~.05~~	Yes	0~~0~~	0~~1~~AM, M	0	1

~~Assessor Parcel Number~~Site #	Assessor Parcel Number~~Site #~~	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	~~Infrastructure~~ Inf. Availability	Income Category			
V13~~16~~	075-095-009	3212 Walnut Lane	0.11	0.11	LDR	R-1	None. Site is vacant and has frontage along Walnut Lane	Vacant	8	1~~0.88~~	1~~0.83~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V14 ~~17~~	075-095-010	3218 Walnut Lane	0.11	0.11	LDR	R-1	None. Site is vacant and has frontage along Walnut Lane	Vacant	8	1~~0.88~~	1~~0.83~~	Yes	0~~0~~	0~~AM, M1~~	0	1
V15~~18~~	075-095-011	3224 Walnut Drive~~Lane~~	0.12	0.12	LDR	R-1	None. Site is vacant and has frontage along Walnut Lane	Vacant	8	1~~0.96~~	1~~0.90~~	Yes	0~~0~~	0~~1AM, M~~	0	1
~~075-095-019 5573 Landon Drive 0.16~~		~~V19~~		~~0.16~~	~~LDR~~	~~R-1~~	~~None. Site is vacant and has frontage along Landon Drive.~~	~~Vacant~~	~~8~~	~~1.28~~	~~11.20~~	~~Yes~~				
V16	075-095-019	5573 Landon Drive	0.16	0.16	LDR	R-1	None. Site is vacant and has frontage along Landon Drive.	Vacant	8	1	1	Yes	0	0	0	1
V17~~20~~	075-095-021	5561 Landon Drive	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Landon Drive.	Vacant	8	1~~.04~~	1~~0.98~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V18~~21~~	075-095-024	3207 Walnut Lane	0.2	0.2	LDR	R-1	None. Site is vacant and has frontage along Walnut Lane	Vacant	8	~~21.6~~	~~21.50~~	Yes	~~01~~	~~01AM, M~~	1	1
V19~~22~~	075-095-032	3202 South Rose Brook Drive	0.2	0.2	LDR	R-1	None. Site is vacant and has frontage along S. Rose Brook Drive.	Vacant	8	~~21.6~~	~~21.50~~	Yes	~~01~~	~~01AM, M~~	1	1
V20~~23~~	075-095-033	3208 South Rose Brook Drive	0.19	0.19	LDR	R-1	None. Site is vacant and has frontage along S. Rose Brook Drive.	Vacant	8	~~1.5~~2	1~~.43~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V21~~24~~	075-095-034	3214 South Rose Brook Drive	0.16	0.16	LDR	R-1	None. Site is vacant and has frontage along S. Rose Brook Drive.	Vacant	8	1~~.28~~	1~~.20~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V22~~25~~	075-095-035	3215 South Rose Brook Drive	0.18	0.18	LDR	R-1	None. Site is vacant and has frontage along S. Rose Brook Drive.	Vacant	8	1~~.44~~	1~~.35~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V23~~26~~	075-095-036	3209 South Rose Brook Drive	0.16	0.16	LDR	R-1	None. Site is vacant and has frontage along S. Rose Brook Drive.	Vacant	8	1~~.28~~	1~~.20~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V24~~27~~	075-095-037	3203 South Rose Brook Drive	0.15	0.15	LDR	R-1	None. Site is vacant and has frontage along S. Rose Brook Drive.	Vacant	8	1~~.2~~	1~~.13~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V25~~28~~	075-095-043	3206 Sutton Road	0.16	0.16	LDR	R-1	None. Site is vacant and has frontage along Sutton Road.	Vacant	8	1~~.28~~	1~~.20~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V26~~29~~	075-095-045	5631 Landon Lane	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Landon Lane.	Vacant	8	1~~.04~~	1~~0.98~~	Yes	0~~0~~	0~~1AM, M~~	0	1
V27~~30~~	075-095-046	5625 Landon Lane	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Landon Lane.	Vacant	8	1~~.04~~	1~~0.98~~	Yes	0~~0~~	0~~1AM, M~~	0	1

~~Assessor Parcel Number~~Site #	Assessor Parcel Number~~Site #~~	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	~~Infrastructure~~ Inf. Availability	Income Category			
V28~~31~~	075-095-047	5619 Landon Lane	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Landon Lane.	Vacant	8	1~~.04~~	1~~0.98~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V29~~32~~	075-095-048	5613 Landon Lane	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Landon Lane.	Vacant	8	1~~.04~~	1~~0.98~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V30~~33~~	075-095-049	5607 Landon Lane	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Landon Lane.	Vacant	8	1~~.04~~	1~~0.98~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V31~~34~~	075-095-050	5601 Landon Lane	0.16	0.16	LDR	R-1	None. Site is vacant and has frontage along Landon Lane.	Vacant	8	1~~.28~~	1~~.20~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V32~~35~~	075-095-058	5642 Landon Lane	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Landon Lane.	Vacant	8	1~~.04~~	1~~0.98~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V33~~36~~	075-095-072	3139 Sutton Road	0.14	0.14	LDR	R-1	None. Site is vacant and has frontage along Sutton Road.	Vacant	8	1~~.12~~	1~~.05~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V34~~37~~	075-095-073	3133 Sutton Road	0.12	0.12	LDR	R-1	None. Site is vacant and has frontage along Sutton Road.	Vacant	8	1~~0.94~~	1~~0.88~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V35~~38~~	075-095-074	3127 Sutton Road	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Sutton Road.	Vacant	8	1~~.03~~	1~~0.97~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V36~~39~~	075-095-076	5627 Pierce Lane	0.13	0.13	LDR	R-1	None. Site is vacant and has frontage along Pierce Lane.	Vacant	8	1~~.05~~	1~~0.98~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V37~~40~~	075-095-077	5621 Pierce Lane	0.12	0.12	LDR	R-1	None. Site is vacant and has frontage along Pierce Lane.	Vacant	8	1~~0.95~~	1~~0.89~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V38~~41~~	075-095-087	3104 Pocket Avenue	0.21	0.21	LDR	R-1	None. Site is vacant and has frontage along Pocket Avenue.	Vacant	8	2~~1.68~~	2~~1.58~~	Yes	0~~1~~	0~~1~~AM, M	1	1
V39~~42~~	075-095-089	3106 Pocket Avenue	0.21	0.21	LDR	R-1	None. Sites is vacant and has frontage along Pocket Avenue.	Vacant	8	2~~1.68~~	2~~1.58~~	Yes	0~~1~~	0~~1~~AM, M	1	1
V40~~43~~	132-035-010	0 Burneyville Road	0.08	0.08	LDR	R-1	Abuts Stanislaus River and access to site is via an unimproved portion of Burneyville Road.	Vacant and undeveloped.	8	1~~0.64~~	1~~0.60~~	Yes	0~~0~~	0~~1~~AM, M	0	1
V41~~44~~	132-036-013	0 Rocky Lane	0.24	0.24	LDR	R-1	Access is via an unimproved Rocky Lane.	Vacant	8	2~~1.92~~	2~~1.80~~	Yes	0~~1~~AM, M	0~~1~~	1	1
~~V45~~	~~132-048-016~~	~~6509 Claus Road~~	~~1.95~~	~~1.95~~	~~LDR~~	~~R-1~~	~~None. Site is vacant and has frontage along Claus Road.~~	~~Vacant~~	~~8~~	~~16~~15.60	~~15~~14.63	~~Yes~~	~~1~~AM, M	~~14~~		
V42~~46~~	132-049-041	0 Eighth Street	0.22	0.22	LDR	R-1	None. Site is vacant and has frontage along 8th Street.	Vacant	8	2~~1.76~~	2~~1.65~~	Yes	0~~1~~AM, M	0~~1~~	1	1
V43~~47~~	132-049-042	0 Eighth Street	0.23	0.23	LDR	R-1	None. Site is vacant and has frontage along 8th Street.	Vacant	8	2~~1.84~~	2~~1.73~~	Yes	0~~1~~AM, M	0~~1~~	1	1

~~Assessor Parcel Number~~Site #	Assessor Parcel Number~~Site #~~	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	~~Infrastructure~~ Inf. Avail~~ability~~.	Income Category			
V44~~48~~	132-049-043	0 Eighth Street	0.23	0.23	LDR	R-1	None. Site is vacant and has frontage along 8th Street.	Vacant	8	2~~1.84~~	2~~1.73~~	Yes	0~~1AM, M~~	0~~1~~	1	1
V45~~49~~	132-049-044	0 Eighth Street	0.22	0.22	LDR	R-1	None. Site is vacant and has frontage along 8th Street.	Vacant	8	2~~1.76~~	2~~1.65~~	Yes	0~~1AM, M~~	0~~1~~	1	1
V46~~50~~	132-057-010	0 California Avenue	0.16	0.16	LDR	R-1	None. Site is vacant and has frontage along California Avenue.	Vacant	8	1~~1.28~~	1~~1.20~~	Yes	0~~0AM, M~~	0~~1~~	0	1
V47~~51~~	132-057-047	0 California Avenue	0.16	0.16	LDR	R-1	None. Site is vacant and has frontage along California Avenue.	Vacant	8	1~~1.28~~	1~~1.20~~	Yes	0~~0AM, M~~	0~~1~~	0	1
Sub-Total			~~12.80~~ **16.8**							~~134~~102	~~126~~89		~~200~~	~~1090~~	16	73
Duplex Residential																
V48	076-016-002	5913 Terminal Avenue	0.17	0.17	LDR	R-2	Contiguous to retail and service station	Vacant	8	2	2	Yes	0	0	2	0
V49	132-015-023	0 7th Street	1.17	1.17	HDR	R-2	Backs to B.N.S.F. Railroad	Vacant	30	35	23	Yes	13	10	0	0
Sub-Total			1.34							37	25		13	10	0	0
Multiple Family Residential																
V50	132-015-025	0 Front Street	0.57	0.57	HDR	R-3	Land locked, no street frontage, backs to B.N.S.F. Railroad; access via alley.	Vacant	30	17	11	Yes	7	4	0	0
V51	132-045-002	6145 Claus Road	4.45	4.45	HDR	R-3	None. Site is vacant and has frontage along Claus Road and California Avenue.	Vacant	30	134	89	Yes	53	36	0	0
Sub-Total			**5.02**							**151**	**100**		**60**	**40**	**0**	**0**
Total Acres/Units			**19.16**							**290**	**215**		**73**	**50**	**18**	**73**

Underutilized Land

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Single Family Residential													Very Low~~Mod~~	~~Above Mod.~~Low	Mod.	Above Mod.
~~W1~~	~~075-090-063~~	~~0 Pocket Avenue~~	~~2.01~~	~~1.61~~	~~LDR~~	~~R-1~~	~~Existing dwelling. Property has frontage along Pocket Avenue.~~	~~(1) Single-family dwelling, (1) large barn, and (1) car garage.~~	~~8~~	~~16~~6.08	~~15.075~~	~~Yes~~	~~3~~AM, M	~~12~~		
W~~1~~2	075-031-034	5931 Roselle Avenue	1.84	1.47~~1.42~~	LDR	R-1	Existing dwelling and miscellaneous structures. Property has frontage along Morrill Road and Roselle Avenue.	(1) Single-family home, (1) carport, (1) accessory structure (2) sheds; balance of site is vacant.	8	15~~4~~.72	10~~14~~3.8	Yes	0~~3~~AM, M	0~~11~~	2	8
~~W3~~	~~075-075-052~~	~~0 Roselle Avenue~~	~~5.16~~	~~5~~	~~LDR~~	~~R-1~~	~~Hetch-Hetchy (SFPUC) and Farmland of Local Importance.~~	~~Pasture and undeveloped.~~	~~8~~	~~41.28~~	~~39~~8.7	~~Yes~~	~~8~~AM, M	~~31~~		
W~~2~~4	075-005-015	2519 W. Stanislaus Street	0.89	0.89~~71~~	LDR	R-1	Flag lot with dwelling at front of property.	Single-family dwelling with accessory structure.	8	7.~~12~~	~~6~~76.68	Yes	0~~1~~AM, M	0~~6~~	1	5
W~~356~~	062-022-027	0 Kentucky Avenue	3.1	2.48~~3~~	LDR	R-1	None. Property has frontage along Kentucky Avenue.	Pasture and undeveloped.	8	25~~4.8~~	16~~23.25~~	Yes	04~~AM, M~~	0~~19~~	6	10
~~W67~~	~~075-005-015~~	~~2519 W. Stanislaus Street~~	~~0.89~~	~~0.67~~	~~LDR~~	~~R-1~~	~~Flag lot with dwelling at front of property.~~	~~Single-family dwelling with one (1) accessory structure.~~	~~8~~	~~7.12~~	~~6.687~~	~~Yes~~	~~1~~AM, M	~~6~~		
~~W78~~	~~075-031-034~~	~~5931 Roselle Avenue~~	~~1.84~~	~~1.39~~	~~LDR~~	~~R-1~~	~~None. Site is underutilized and has frontage along Roselle Avenue.~~	~~Single-family home, carport, & one accessory structure. Balance of site is vacant.~~	~~8~~	~~15~~4.72	~~14~~3.80	~~Yes~~	~~3~~AM, M	~~11~~		
Sub-Total			~~5.83~~13.89	4.84						~~126~~47	~~119~~328		~~230~~	~~960~~	9	23
Duplex Residential																
W~~4~~8	132-063-006	2967 Morrill Avenue	1.01	1.01~~0.6~~1	MDR	R-2	Existing dwelling. Property has frontage along Roselle Avenue and Morrill Road.	Single-Family Dwelling	16	16	~~10~~12	Yes	0	0~~M~~	12	0
Sub-Total			**1.01**							**16**	**12~~10~~**		**0**	**0**	**12**	**0**

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Multiple Family Residential																
W5910	075-003-011	0 Topeka	0.73	0.73	HDR	R-3	None. Site is underutilized and has frontage along Topeka Street.	Utilized as side yard for contiguous parcel to the east.Accessory structures	30	221.9	154.6	Yes	9	6EL, VL, L	0	0
W6109	075-003-012	2767 Topeka	1.31	1.3113	HDR	R-3	Contiguous to SR 108. Property has frontage along Topeka Street.	Single-family dwelling.	30	403939.3	26.2	Yes	16	10EL, VL, L	0	0
W7110	075-069-002	5425 Roselle Avenue	2.07	2.071.74	HDR	R-3	None. Site is underutilized and has frontage along Roselle Avenue.	Single-family dwelling, barn, and large carport.	30	62.1	41.4	Yes	25	16EL, VL, L	0	0
W8121	075-069-003	5401 Roselle Avenue	1.92	1.9244	HDR	R-3	None. Site is underutilized and has frontage along Roselle Avenue.	Single-family dwelling, large barn and detached garage.	30	587.6	38.4	Yes	23	15EL, VL, L	0	0
W132	132-051-018	0 Ross Avenue	0.15	0.14	HDR	R-3	Multi-family dwelling on site; remaining is vacant; site has frontage on Ross Avenue.	One (1) dwelling.	30	54.5	3	Yes	EL, VL, L			
Sub-Total			6.036.18							1875181	1234121		73	47	0	0
Total Acres/Units			12.87							244	165		73	47	21	23

Downtown Specific Plan																
Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Duplex Residential													Very Low	Low	Mod.	Above Mod.
X1~~1~~	132-010-057	6709 1st Street	0.14	0.14	MDR	DG/R-2	Narrow lot. Site has frontage along Santa Fe Street and access on 1st Street.	Vacant	16	2~~.24~~	1~~.4~~	Y	0~~M~~	0	1	0
X2	132-010-026	3037 1st Street	0.50	0.50	MDR	DN/C-1	Single-family residence with the majority of the site undeveloped. Has access to 1st Street.	Single-family Residence	16	8	6	Y	0	0	6	0
Sub-Total			**0.64~~0.14~~**	**0.64**						**10~~2~~**	**~~1~~7**		**0**	**0**	**7**	**0**
Mixed Use																
X3~~2~~	~~132-017-027~~132-034-020	~~6412 2nd Street~~2906 Santa Fe Avenue	~~0.18~~26.97	~~0.18~~9.99	~~HDR~~MU	~~MU/R-3~~CD/M-1	Site is directly adjacent to B.N.S.F Railroad. Site has f~~F~~rontage along ~~2nd Street.~~multiple roadways.	~~Vacant~~Large industrial warehouses	~~30~~20	~~5.4~~539	~~43.6~~200	Y	120~~EL, VL, L~~	80	0	0
X4~~3~~	~~132-017-032~~132-009-069	~~6426 2nd Street~~N/A	~~0.16~~1.1	~~0.16~~1.1	~~HDR~~MU	~~MU/R-3~~DC	~~None. Site has frontage along 2nd Street.~~Site is vacant and has frontage on Atchison Street and 3rd Street.	Vacant	~~30~~20	~~54.8~~22	~~3.2~~22	Y	13~~EL, VL, L~~	9	0	0
X5~~4~~	~~132-017-033~~132-011-053	~~6430 2nd Street~~3141 Sierra Street	~~0.21~~0.57	~~0.21~~0.57	~~HDR~~MU	~~MU/R-3~~MU/M-1	~~None. Site has frontage along 2nd Street.~~Wide lot. Property has frontage along Sierra Street and 2nd Street.	Vacant	~~30~~20	~~6.3~~11	4.2~~11~~	Y	7~~EL, VL, L~~	4	0	0
Sub-Total			**28.64**	**11.66**						**573~~7~~**	**~~11~~233**		**140**	**93**	**0**	**0**
Total Acres/Units			**29.28**							**583**	**240**		**140**	**93**	**7**	**0**

Crossroads West Specific Plan

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
													Very Low	Low	Mod.	Above-Mod.
Y1	074-025-023	N/A	9.61	7.69	Specific Plan	MU	None. Site has access to Oakdale Road and under construction commercial uses to the south and southwest.	Vacant	16	123	92	Yes	0	0	92	0
Y2	074-025-001 - 074-025-025	N/A	44.4	35.52	Specific Plan	MU	Located north of Claribel Road. Existing and under construction commercial uses. Specific Plan contemplates residential uses to be constructed.	Commercial Uses but undeveloped parcels are vacant	16	568	258	Yes	0	0	258	0
Y3	074-014-017A	N/A	58.68	44.01	Specific Plan	LDR	Part of the CSWP and area would need to be subdivided.	Vacant	8	352	286	Yes	0	0	0	286
Y4	074-014-017B	N/A	6	6.00	Specific Plan	HDR	HDR site within CWSP. Area would need to be subdivided to facilitate development of HDR portion of property.	Vacant	25	150	120	Yes	72	48	0	0
Y5	074-011-004	5955 Oakdale Road	0.97	0.97	Specific Plan	MU	Part of the CWSP as Mixed Use Designation. Currently developed with a single-family residence.	Single-family residence	16	16	12	Yes	0	0	12	0
Y6	074-011-015	N/A	1.37	1.37	Specific Plan	MDR	Vacant site located south of Morrill Road. Would need to be subdivided or merged with larger lot for MDR project to move forward	Vacant	16	22	16	Yes	0	0	16	0
Y7	074-011-017A	N/A	110.7	83.03	Specific Plan	LDR	LDR-2 and LDR-3 in the CWSP. Property would need to be subdivided.	Vacant	8	664	540	Yes	0	0	0	540
Y8	074-011-017B	N/A	10.63	7.97	Specific Plan	MDR	MDR site located south of Morrill Road.	Vacant	16	128	96	Yes	0	0	96	0
Y9	074-011-017C	N/A	6	6.00	Specific Plan	HDR	HDR site south of Morrill Road in CWSP.	Vacant	25	150	120	Yes	72	48	0	0
Y10	074-011-017D	N/A	4.3	3.44	Specific Plan	MU	MU Site located at the corner of Morrill Road and Oakdale Road.	Vacant	16	55	41	Yes	0	0	41	0
Y11	074-006-016	N/A	60.43	45.32	Specific Plan	LDR	LDR-1 north of Morrill Road in the CWSP. LDR-1 area would need to be subdivided for development to occur.	Vacant	8	363	295	Yes	0	0	0	295
Y12	074-006-023	N/A	2.88	2.30	Specific Plan	HDR	HDR site located north of Morrill Road, east of Sports Complex.	Vacant	25	58	46	Yes	28	18	0	0
Y13	074-006-024	N/A	1.65	1.32	Specific Plan	HDR	HDR site located north of Morrill Road, east of Sports Complex.	Single-family residence	25	33	26	Yes	16	11	0	0
Y14	074-024-001	2003 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y15	074-024-002	2007 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Y16	074-024-003	2011 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y17	074-024-004	2015 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y18	074-024-005	2019 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y19	074-024-006	2023 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y20	074-024-007	2027 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y21	074-024-008	2031 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y22	074-024-009	2035 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y23	074-024-010	2039 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y24	074-024-015	2059 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y25	074-024-016	2063 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y26	074-024-017	2067 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y27	074-024-018	2071 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y28	074-024-019	2075 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y29	074-024-020	2079 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y30	074-024-021	2083 Shoreline Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y31	074-024-022	2087 Shoreline Drive	0.12	0.12	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y32	074-024-023	5466 Drawbridge Way	0.19	0.19	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y33	074-024-024	5462 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1

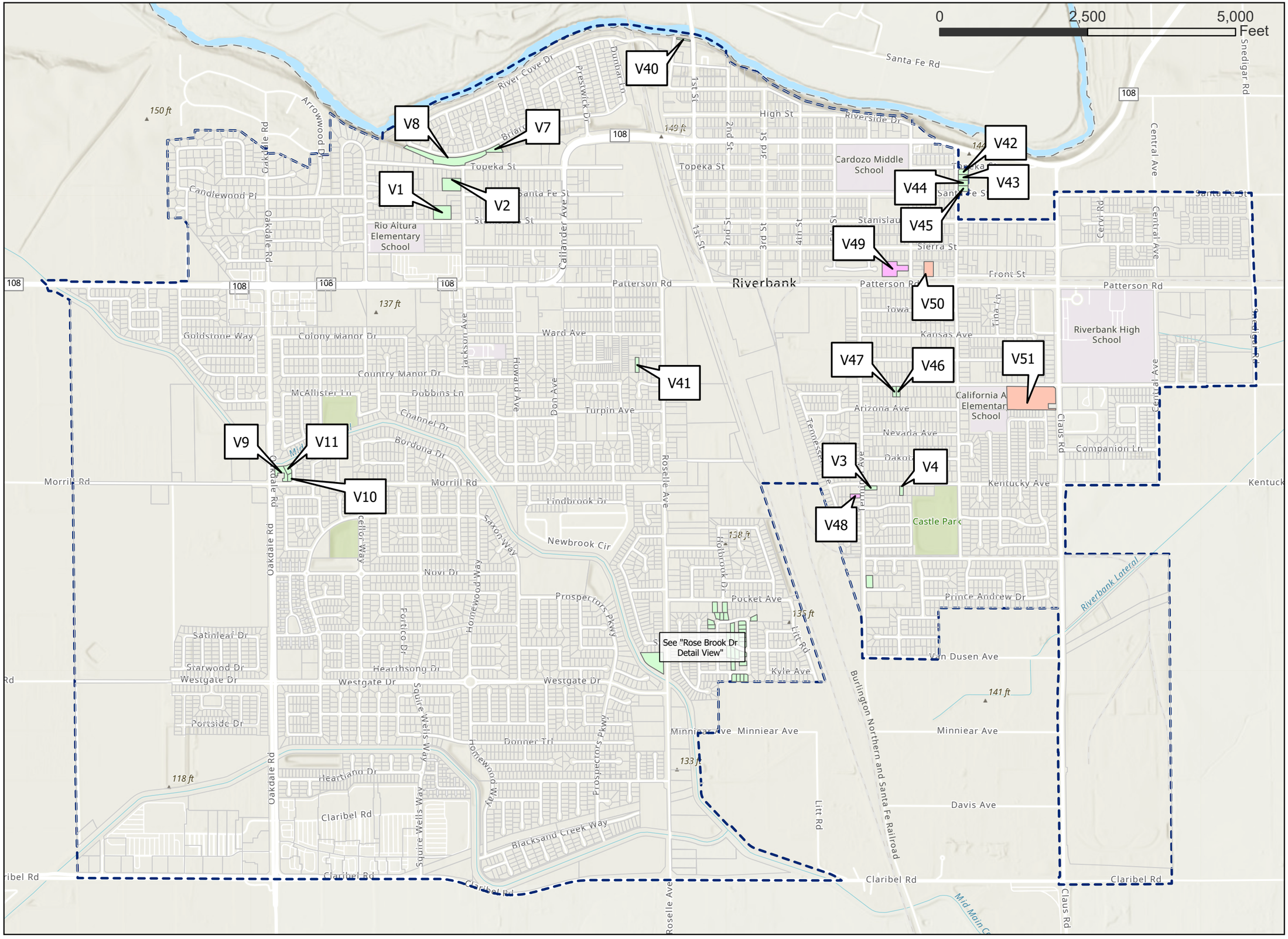
Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Y34	074-024-025	5458 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y35	074-024-026	5454 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y36	074-024-027	5450 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y37	074-024-028	5446 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y38	074-024-029	5442 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y39	074-024-037	2062 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y40	074-024-038	2058 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y41	074-024-039	2054 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y42	074-024-040	2050 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y43	074-024-041	2046 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y44	074-024-042	2042 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y45	074-024-043	2038 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y46	074-024-044	2034 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y47	074-024-045	2030 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y48	074-024-046	2026 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y49	074-024-047	2022 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y50	074-024-048	2018 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y51	074-024-049	2014 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Y52	074-024-050	2010 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y53	074-024-051	2006 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y54	074-024-052	2002 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y55	074-024-053	5413 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y56	074-024-054	5417 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y57	074-024-055	5427 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y58	074-024-056	5431 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y59	074-024-057	5435 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y60	074-024-058	5439 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y61	074-024-059	5443 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y62	074-024-060	5447 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y63	074-024-061	5451 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y64	074-024-062	5455 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y65	074-024-063	5453 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y66	074-024-064	5451 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y67	074-024-065	5447 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y68	074-024-066	5443 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y69	074-024-067	5439 Drawbridge Way	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Y70	074-024-069	5456 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y71	074-024-070	5440 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y72	074-024-071	5444 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y73	074-024-072	5448 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y74	074-024-073	5452 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y75	074-024-074	5454 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y76	074-024-075	5460 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y77	074-024-076	5461 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y78	074-024-077	5457 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y79	074-024-078	5453 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y80	074-024-079	5449 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y81	074-024-080	5445 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y82	074-024-081	5441 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y83	074-024-082	5437 Regatta Lane	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y84	074-024-083	2043 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y85	074-024-084	2039 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y86	074-024-085	2035 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y87	074-024-086	2031 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Y88	074-024-087	2027 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y89	074-024-088	2023 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y90	074-024-089	2019 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y91	074-024-090	2015 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y92	074-024-091	2011 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y93	074-024-092	2007 Portside Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y94	074-024-093	5426 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y95	074-024-094	5430 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y96	074-024-095	5434 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y97	074-024-096	5438 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y98	074-024-097	5442 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y99	074-024-098	5446 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y100	074-024-099	5450 Harvest Creek Drive	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y101	074-024-100	5404 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y102	074-024-101	5408 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y103	074-024-102	5412 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y104	074-024-103	5416 Harmony Circle	0.17	0.17	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y105	074-024-104	5420 Harmony Circle	0.13	0.13	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1

Site #	Assessor Parcel Number	Address	Gross Acres	Net Acres	GP Land Use Des.	Zoning	Factors Affecting Development	Existing Use	Max Density	Max Capacity	Realistic Capacity	Inf. Avail.	Income Category			
Y107	074-024-106	5426 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y108	074-024-107	5432 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y109	074-024-108	5436 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y110	074-024-109	5440 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y111	074-024-110	5444 Harmony Circle	0.13	0.13	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y112	074-024-111	5448 Harmony Circle	0.17	0.17	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y113	074-024-112	5452 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y114	074-024-113	5456 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Y115	074-024-114	5460 Harmony Circle	0.11	0.11	Specific Plan	LDR	Finished lot in Crossroads Unit 2 Subd.	Vacant	8	1	1	Yes	0	0	0	1
Total Acres/Unit			329.09	256.41						**2,783**	**2,050**		**188**	**125**	**515**	**1,223**



City of Riverbank

Vacant Parcels

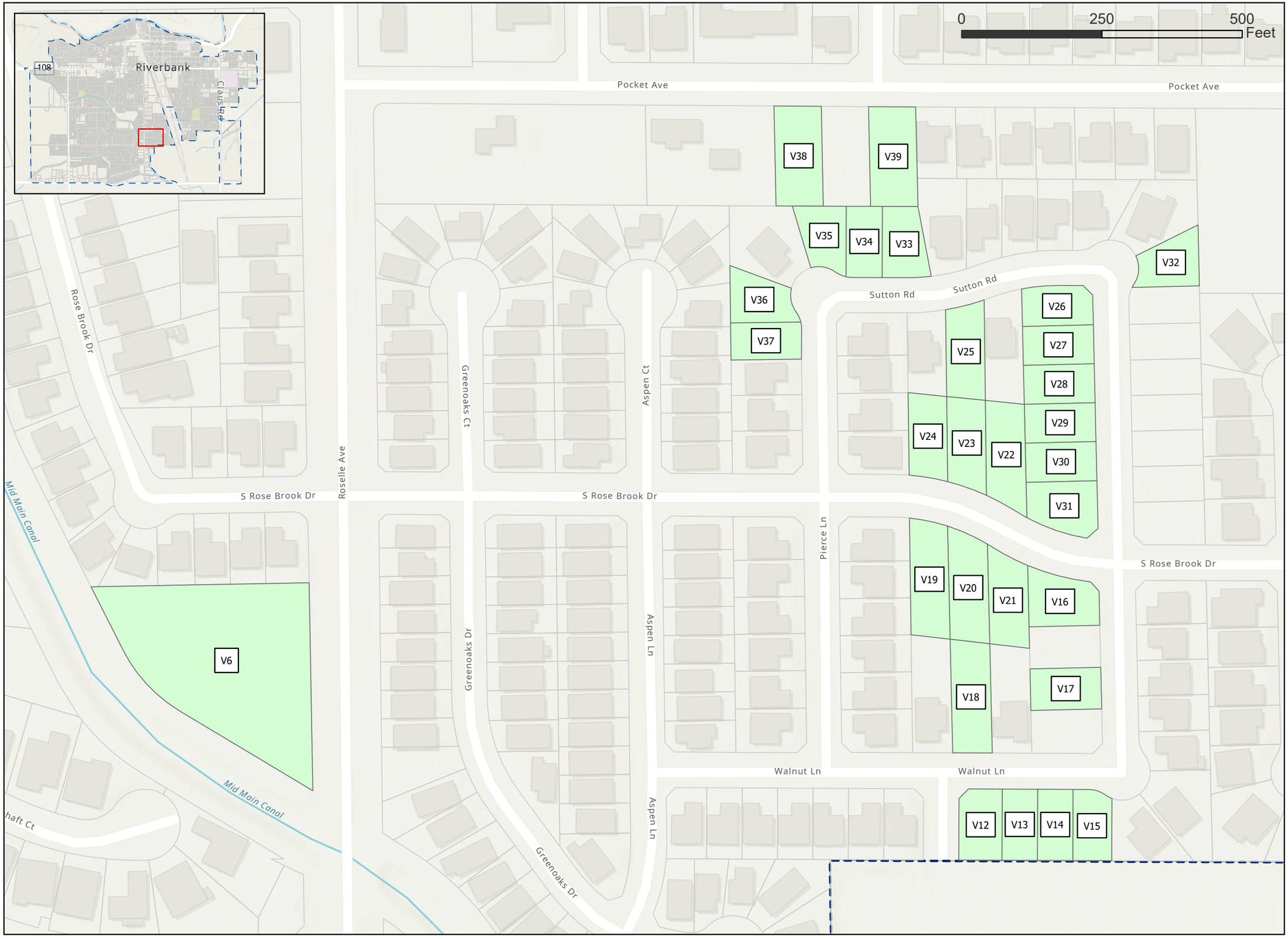
City Limits

Zoning

- R-1
- R-2
- R-3

N

Parcel and zoning data from City of Riverbank, June 2025.
Basemap from ESRI.



City of Riverbank

Vacant Parcels

Rose Brook Drive Detail View

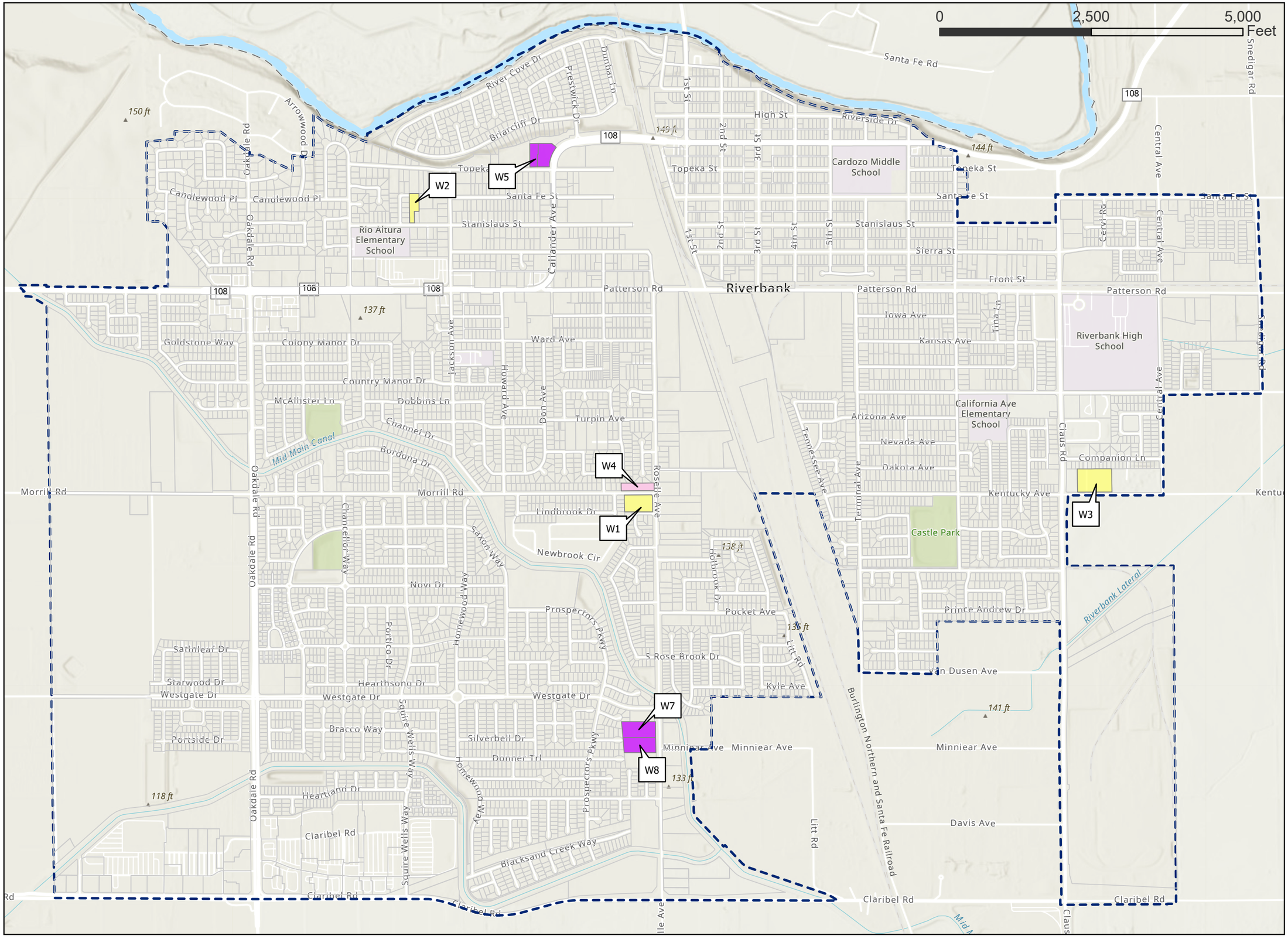
City Limits

Zoning

- R-1
- R-2
- R-3

N

Parcel and zoning data from City of Riverbank, June 2025.
Basemap from ESRI.



Underutilized Parcels

City Limits

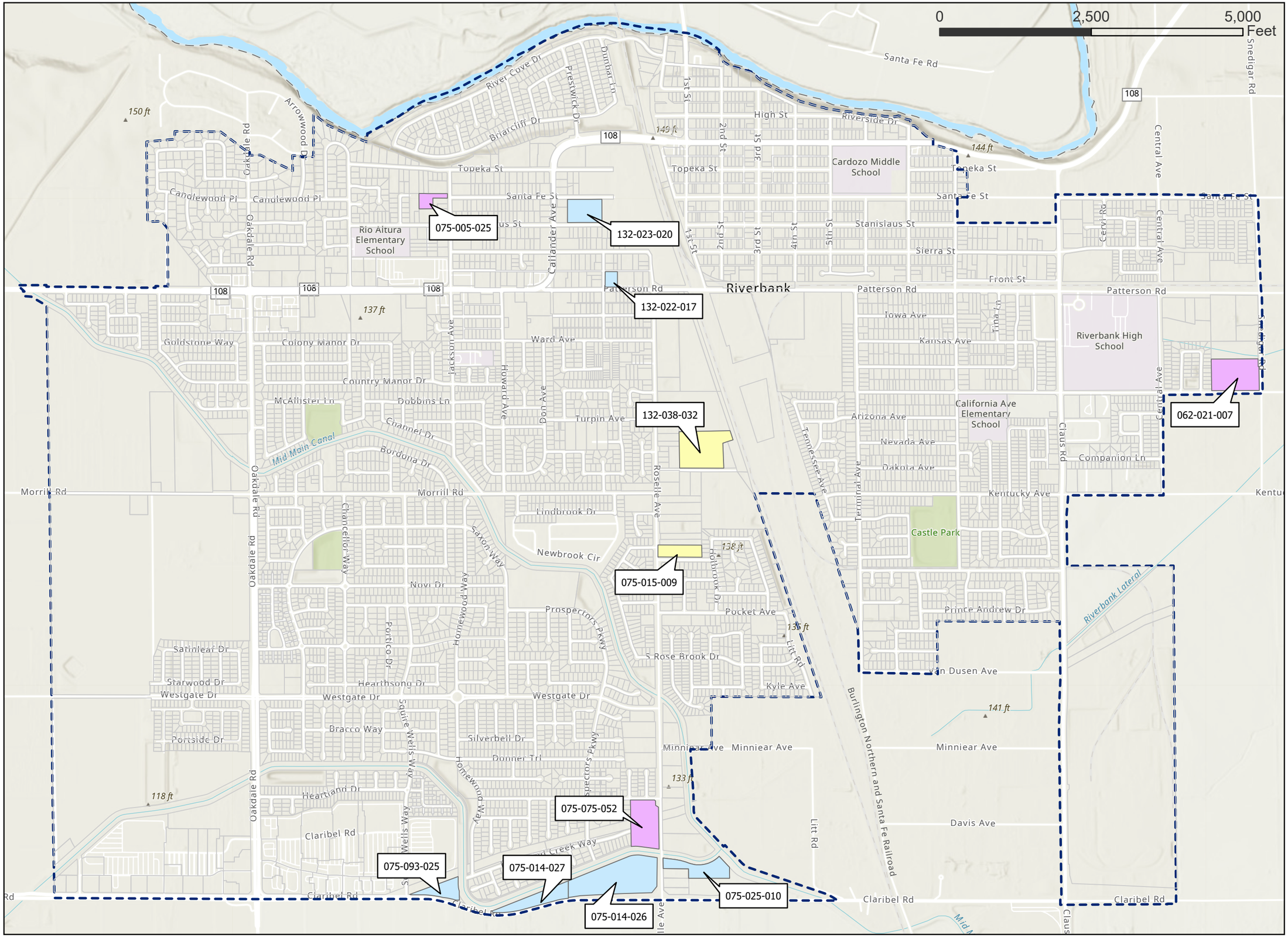
Zoning

- R-1
- R-2
- R-3

N

Parcel and zoning data from City of Riverbank, June 2025. Basemap from ESRI.

City of Riverbank



City of Riverbank

Rezone Sites Parcels

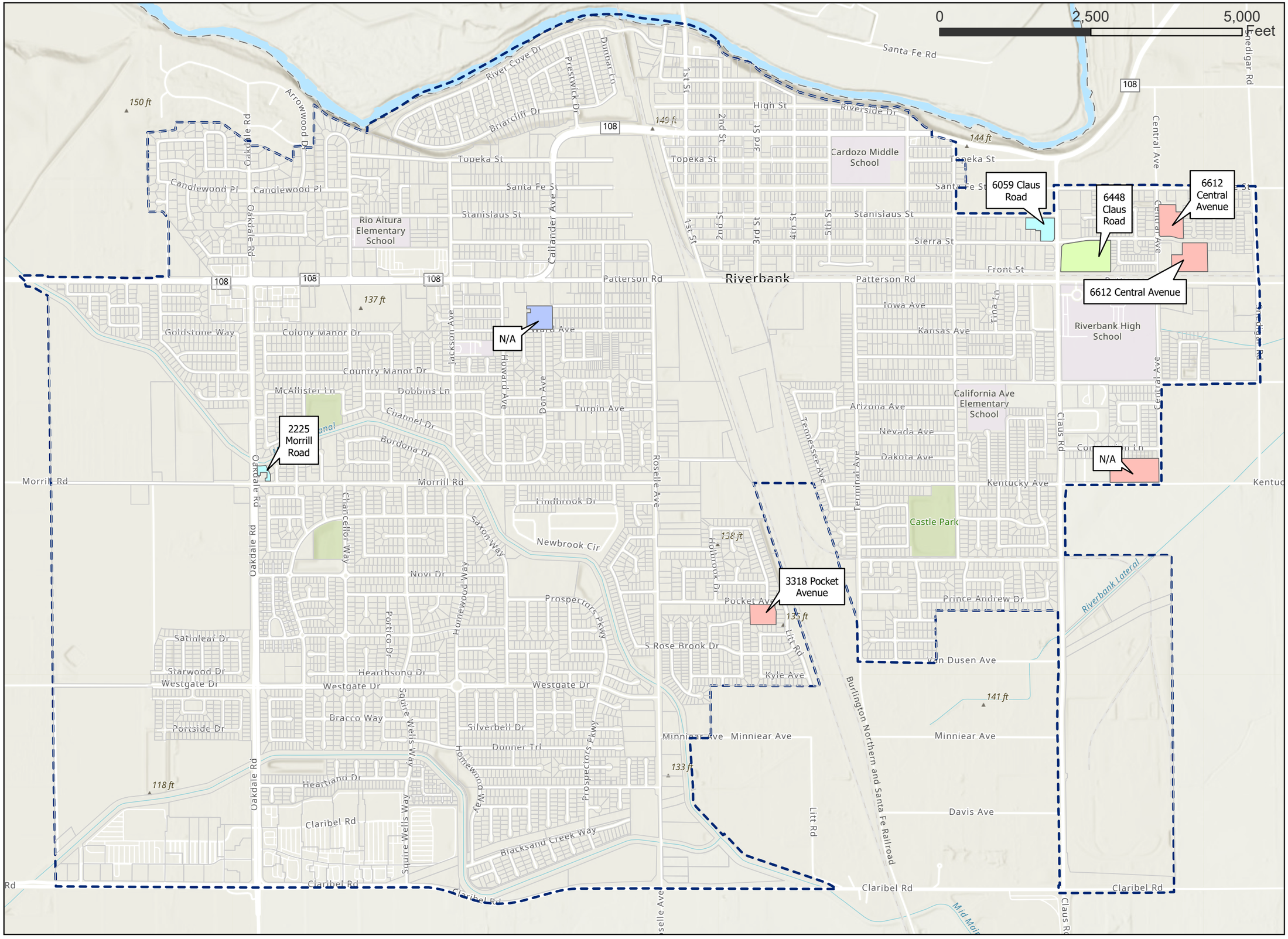
City Limits

Zoning

- C-1
- LI
- R-1

N

Parcel and zoning data from City of Riverbank, June 2025. Basemap from ESRI.



City of Riverbank

Pending Development Parcels

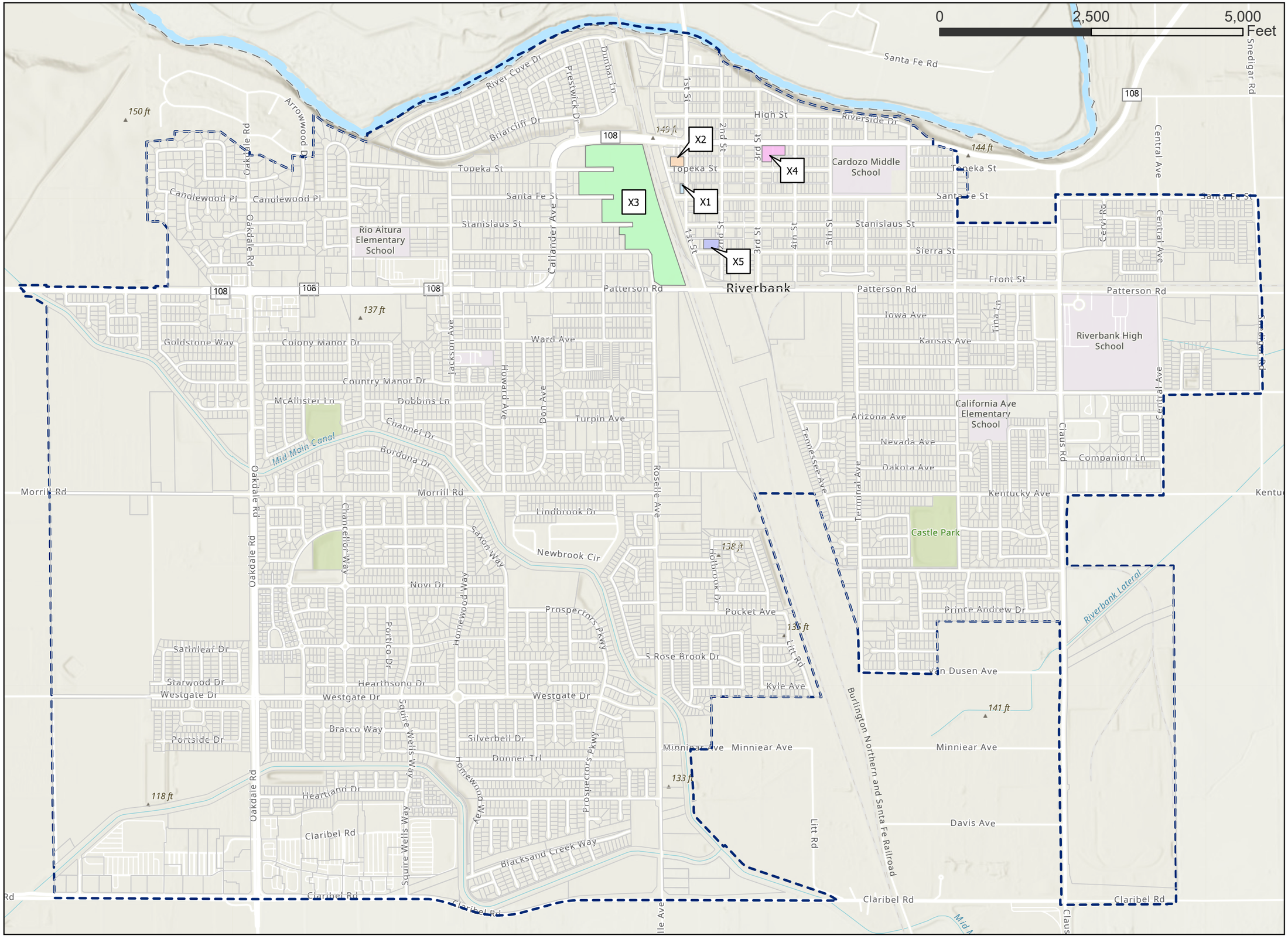
City Limits

Zoning

- CX-1
- PD (Com)
- PD (Res)
- R-1

N

Parcel and zoning data from City of Riverbank, June 2025. Basemap from ESRI.



City of Riverbank

Downtown Specific Plan Parcels

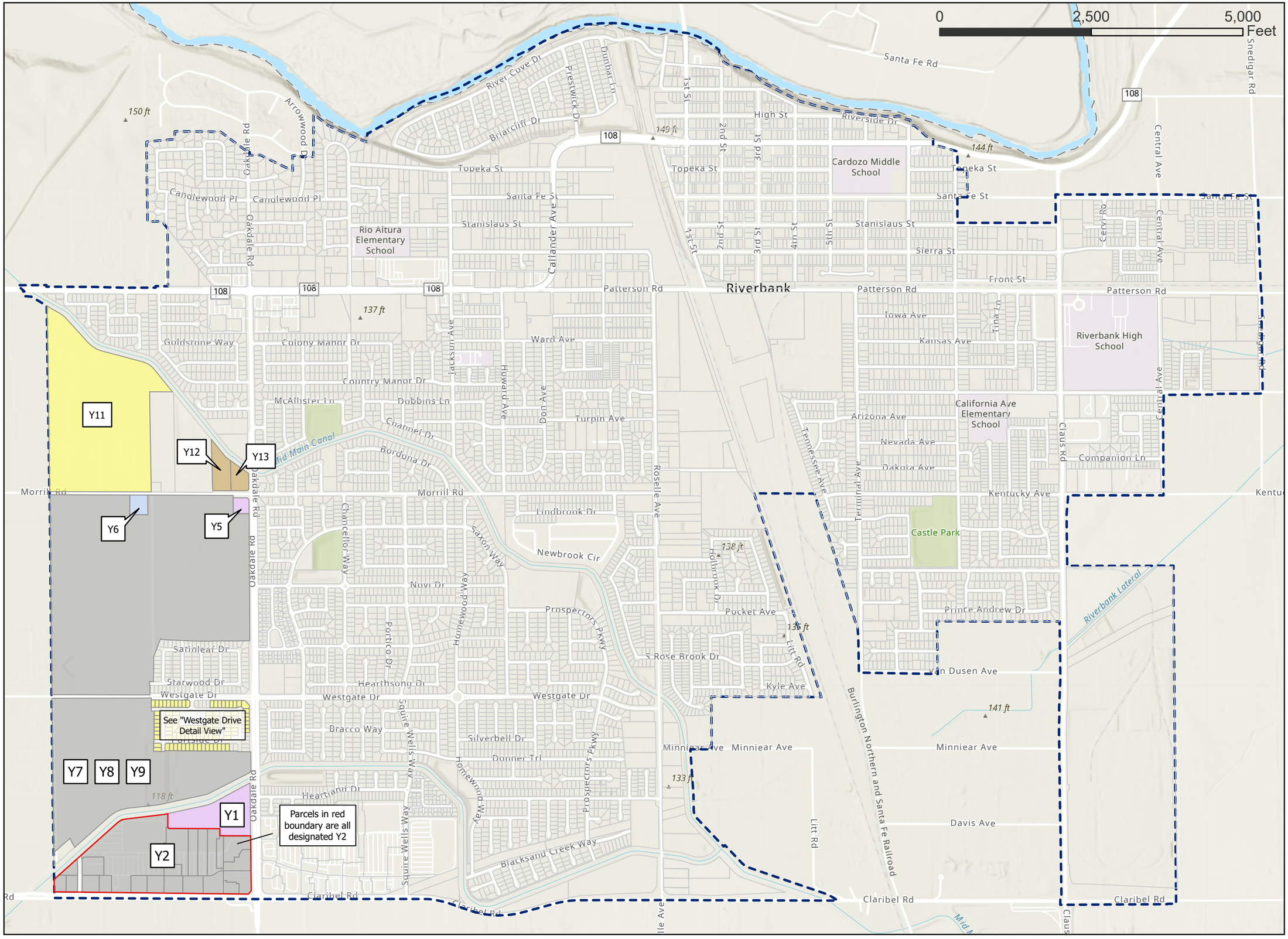
City Limits

Zoning

- CD/M-1
- DC
- DG/R-2
- DN/C-1
- MU/M-1

N

Parcel and zoning data from City of Riverbank, June 2025.
Basemap from ESRI.



City of Riverbank

Crossroads West Specific Plan Parcels

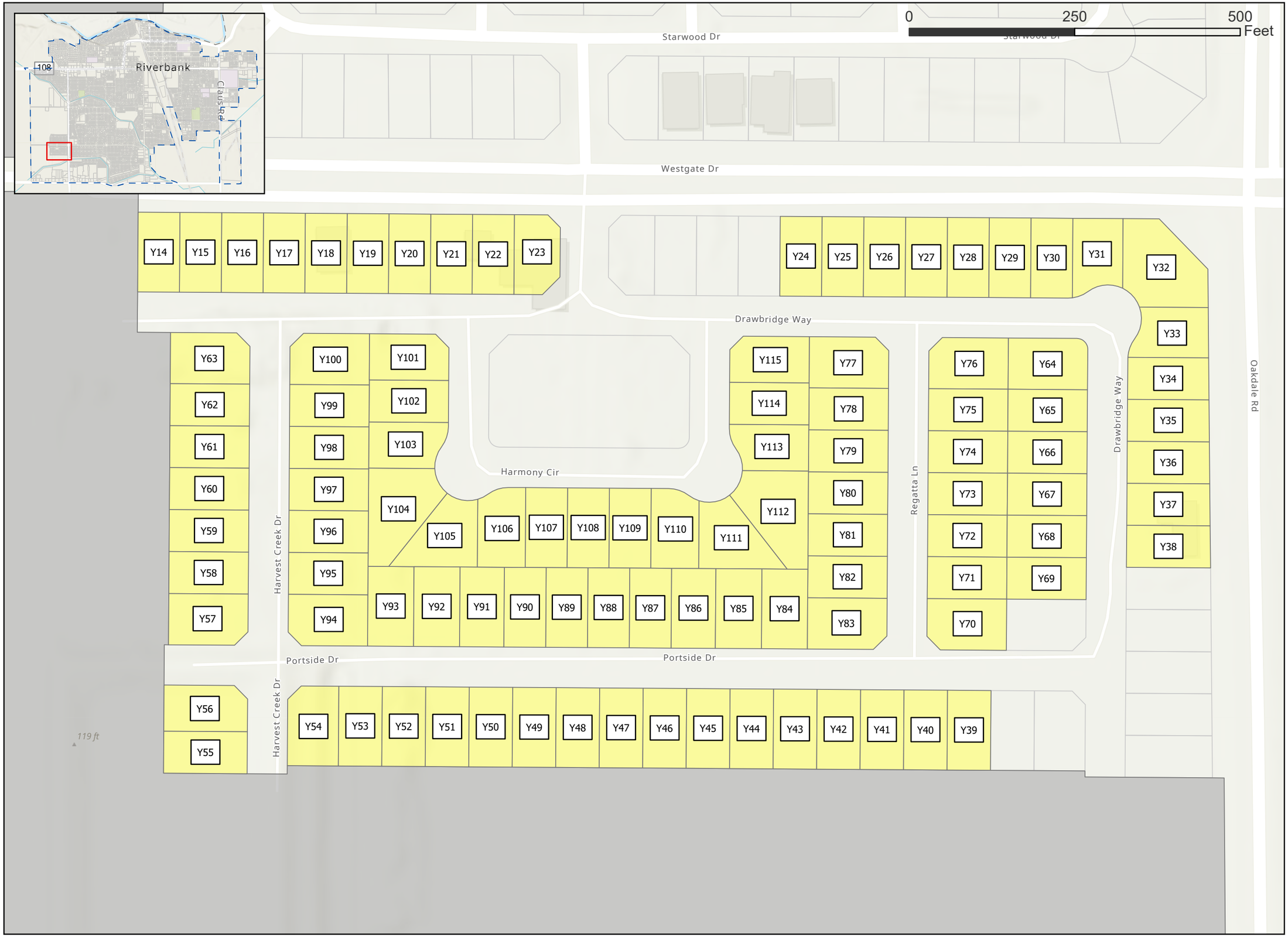
City Limits

General Plan

- HDR
- LDR
- MDR
- MU
- No Data

N

Parcel and zoning data from City of Riverbank, June 2025. Basemap from ESRI.



City of Riverbank

Crossroads West Specific Plan Parcels

Westgate Dr Detail View

City Limits

Zoning

- HDR
- LDR
- MDR
- MU
- No Data

N

Parcel and zoning data from City of Riverbank, June 2025. Basemap from ESRI.

APPENDIX I
DEFINITIONS

APPENDIX I
Definitions

Constraints - potential and actual governmental and non-governmental hindrances to the maintenance, improvement, and development of housing for all income levels.

County - the unincorporated areas of Stanislaus County over which the County governing body maintains jurisdictional control.

Countywide - the incorporated and unincorporated portions of Stanislaus County.

Deteriorating - Refers to housing units which needs more repair than would be provided in the course of regular maintenance and indicates lack of proper upkeep. Such defects would classify a unit as deteriorating: holes, open cracks, missing materials (over a small area), windows not rain or wind proof, missing bricks, broken, or loose railing.

Dilapidated - refers to a housing unit which no longer provides safe and adequate shelter. The defects are so critical that the unit should be either extensively repaired, or rebuilt, or torn down. Such defects would classify a unit as dilapidated: holes, open cracks, missing materials (over a large area), and substantial sagging of floors, walls or roof, extensive damage due to storm, fire, or flood.

Disability - a physical or mental problem lasting six months or longer.

Elderly - people of the age 62 years or older.

Fair-Share Allocation Plan - a provision of the 1977 Housing and Community Development Housing Element Guidelines which assigned the regional councils of governments to determine the responsibility of each local jurisdiction within the region to address the housing needs of all economic sectors of the population.

Farm Worker - those regular or full-time farm laborers employed for more than 150 days annually and those seasonal or migrant farm laborers who travel more than 50 miles across County lines to obtain agricultural employment and reside in the County approximately six months of the year.

Handicapped - refers to individuals with a physical or mental disability.

Household - refers to all persons occupying a dwelling unit.

Large Family - a family comprising of four or more people.

Lower Income - refers to very low- and low- income groups.

Very Low, Low, and Moderate Income - very low income refers to households that earn 50 percent or less of the median County income; low income refers to households earning 51-80 percent of the median County income; and moderate income refers to households earning 81-120 percent of the median County income level.

Multiple-Family Units - refers to occupied owner and rental multiple unit dwellings ranging in size from duplexes to large apartment complexes containing many units.

Need - the summation of new units, rehabilitated units, and rental units which would be required to enable all lower and moderate income households in the unincorporated areas of the County to be adequately housed.

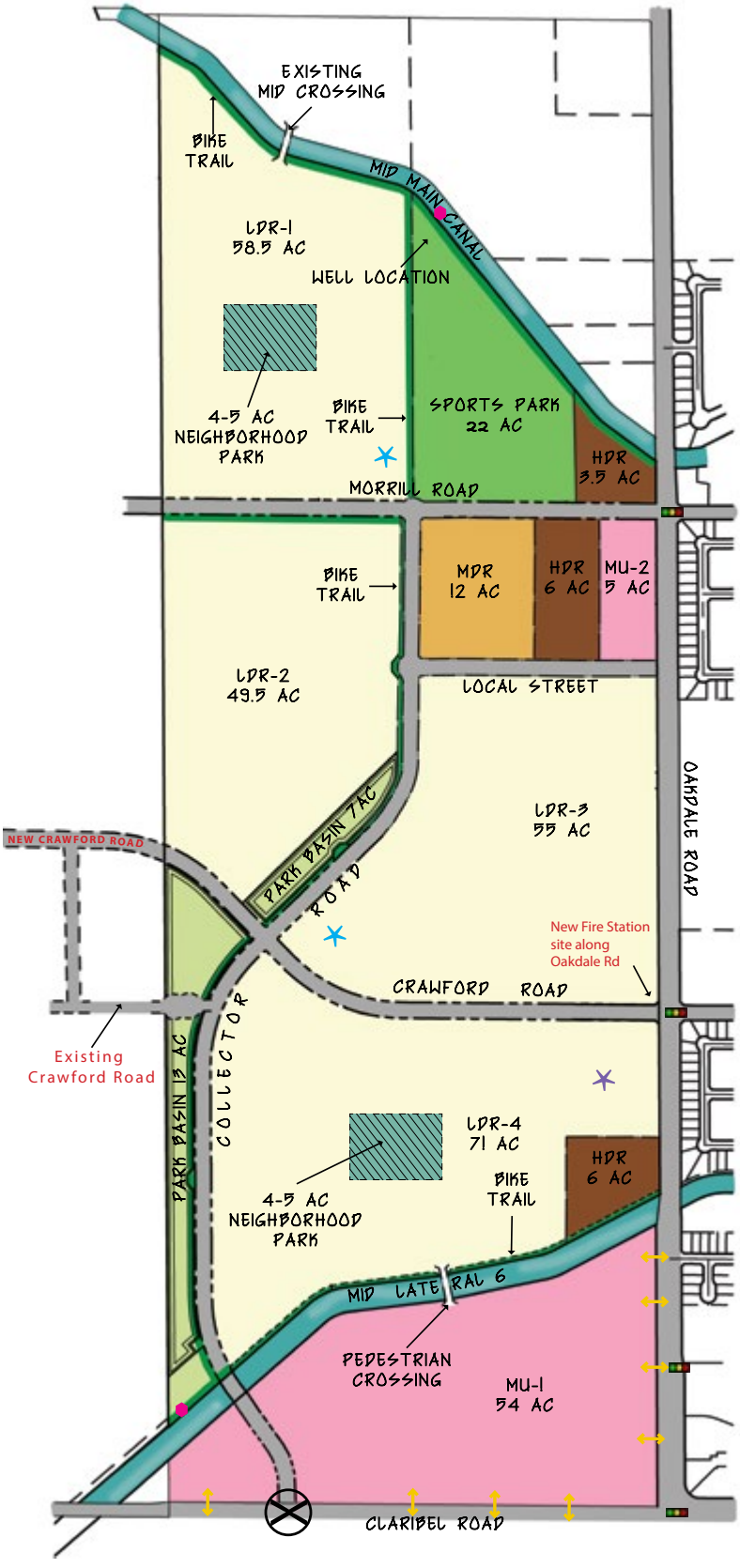
Overcrowded - refers to households in which there is less than one room per person.

Single Family Unit - refers to owner and renter occupied single, detached, and attached units.

Total Housing Stock - refers to three basic categories of housing types: (1) single-family units; (2) multiple- family units; and (3) mobile homes.

APPENDIX J

CROSSROADS WEST CONCEPTUAL LAND USE PLAN



LEGEND/NOTES

- LOW-DENSITY RESIDENTIAL (LDR) - 5-8 DU/Acre [3, 4]
- MEDIUM DENSITY RESIDENTIAL (MDR) - 8-16 DU/Acre
- HIGH DENSITY RESIDENTIAL (HDR) - 20+ DU/Acre
- REGIONAL SPORTS PARK (P)
- MIXED USE 1 (MU-1) [5]
- MIXED USE 2 (MU-2)
- School (S)
- PARK/BASIN (P)
- Neighborhood Park
- ARTERIALS, COLLECTORS AND LOCAL STREETS

Acres	D.U.'s	Average D.U./Acre	S.F.
234	1,521	6.5	-
12	144	12	-
15.5	310	20	-
22	-	-	-
54	0/350	-	550,000/360,000
5	38	12	27,000
20	-	-	-
25	-	-	-
387.5 [1]	**2,013/2,363**		**577,000/387,000**

LEGEND/NOTES

- ACCESS POINTS FOR COMMERCIAL
- EXISTING TRAFFIC SIGNALS
- POSSIBLE TRAFFIC SIGNAL
- POSSIBLE SCHOOL SITE [3] (S)
- ACTIVE ADULT [2]
- BIKE TRAIL
- STORM DISCHARGE
- POSSIBLE NEIGHBORHOOD PARK

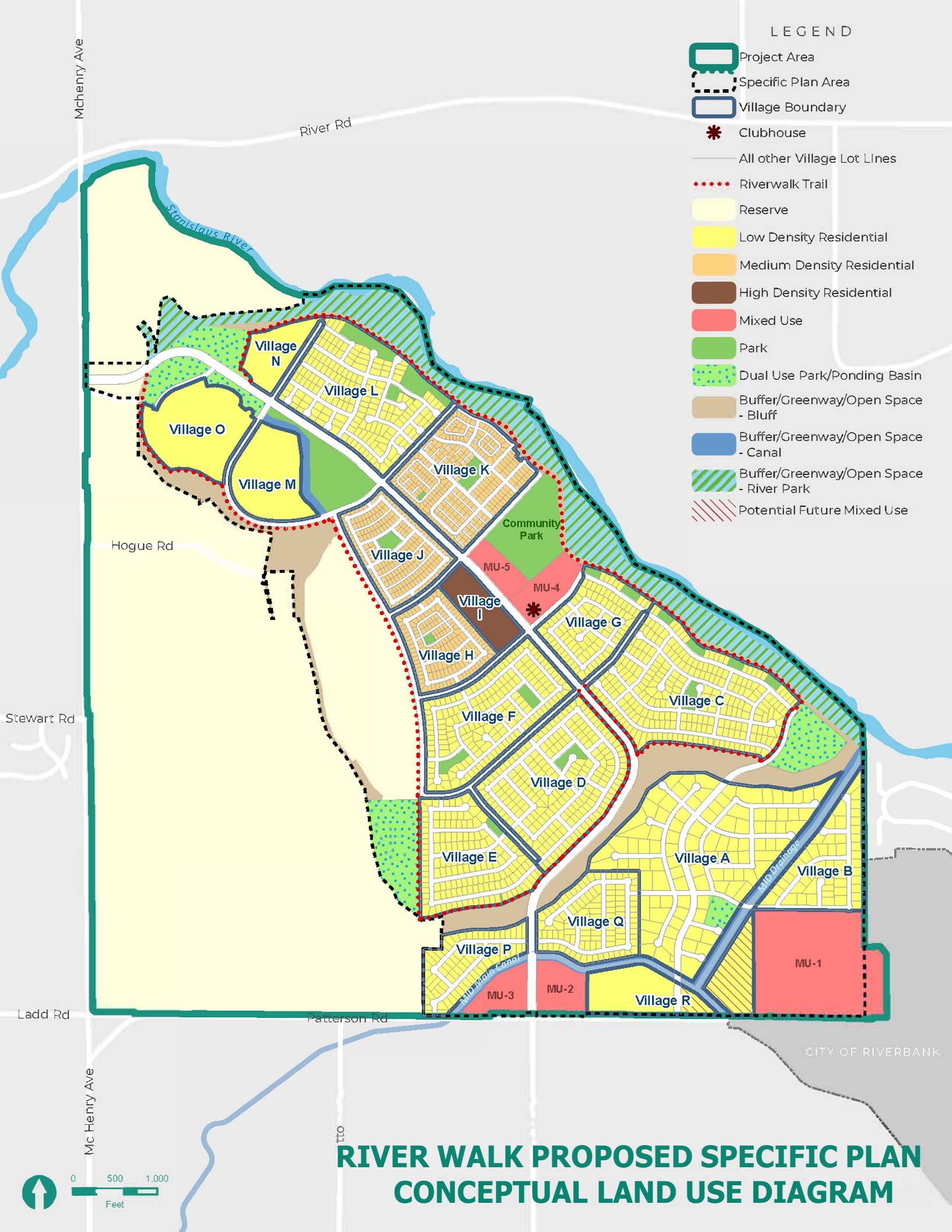
NOTES:

[1] Total acreage does not include the existing Right-of-Ways for the MID Main Canal, Oakdale Road, MID Lateral No. 6, or Claribel Road.
[2] Active Adult is allowed anywhere within the LDR designation.
[3] The School locations are a placeholder within the LDR.
[4] LDR unit count includes Neighborhood Park land which has an underlying land use designation of LDR.
[5] In Mixed Use 1, development could consist of all retail (550,000 sf) and no residential; or up to 350 units of residential and about 360,000 sf of retail.
[6] Park area and school areas are included in the LDR acreage.
[7] The Land Use areas and shapes as shown on this Land Use Map are conceptual. Shapes of the Land Use areas may be reconfigured based on final design.

N

Crossroads West Land Use Map

APPENDIX K
RIVERWALK LAND USE PLAN



RIVER WALK PROPOSED SPECIFIC PLAN
CONCEPTUAL LAND USE DIAGRAM

APPENDIX L
COMMENTS RECEIVED ON PUBLIC REVIEW DRAFT HE

October 28, 2024

City of Riverbank

6707 3rd Street

Riverbank, CA 95367

Attention: Joshua Mann - Director of Community Development for the City of Riverbank

RE: Revised Draft Housing Element

Mr. Mann,

I am deeply concerned that the city of Riverbank is trying to push the ***proposed*** River Walk project into the revised Housing Element. The Planning Commission stated this month at their meeting that "River Walk CANNOT be used for demonstrating that the housing numbers can be met as this is only a proposed project, not even a pending project."

River Walk has also gained a very large number of opposition signatures to qualify to be put it on the ballot in 2026, so that the residents of Riverbank can finally have a say and be heard, yet Riverbank is trying to push this project so that it can be included in the Housing element and becomes a part of the general plan.

This project has had a major and severe conflict of interest from the beginning with Mayor O'Brien and his friend and colleague Bill Berryhill. Mr. Berryhill and his partner own most of the prime river bottom agricultural farm ground that this project proposes to destroy and develop providing Mr. Berryhill with a huge financial gain. Not only is this prime agricultural ground in a flood zone, but it would involve the annexation of 1,000 acres of this prime agricultural ground which is NOT even in Riverbank's Sphere of Influence at this time. Annexing this would be a complete violation of Riverbank's expansion plan. In 2016, Riverbank added 1,500 acres to the plan with this increase intending to cover **a minimum of a 20-year planning horizon through the year 2036.**

In addition, both Mayor O'Brien and Mr. Berryhill sit on the LAFCO Committee together who will have the final vote and say if this project will go through although this project also contradicts LAFCO's stated goals.

Please consider my comments for removing River Walk from the revised Housing Element.

Thank you,

Christa Casci

Christa Casci

November 4, 2024

City of Riverbank Community Development Department

Attn: Joshua Mann - Director of Community Development

Dear Mr. Mann,

I would like to voice my opposition to include the proposed River Walk project in the revised Housing Element. This is a proposed project only and one that most do not want. Signatures in opposition of this project were obtained in order to put it on the ballot even though the Mayor of Riverbank has said he does not agree with the voters having a say in this. This project would require annexing prime farm ground that is NOT in the sphere of influence and doing so would violate Riverbank's own expansion plan. In addition, at the Planning Commission Meeting held earlier this month, the Planning Commission itself stated that this project CANNOT be used for demonstrating that the housing numbers have been met due to the fact that this project is not pending or approved.

As many of you know, Mr. Bill Berryhill is one of the major land owners of this proposed project and sits together with Mayor O'Brien on LAFCO's board who ultimately has the final say if this project will get the green light. This project also goes against LAFCO's own stated goals, yet it appears that Mayor O'Brien and Mr. Berryhill have been working together for some time to get this project in the back door for financial gain.

It saddens and greatly disturbs me that I must write a letter in opposition of something that is clearly in violation of the City of Riverbank's own plans set forth and put into place to benefit the people.

Sincerely,

Diana Hernandez - Adrian

Diana Hernandez-Adrian

Mr. Josh Mann
November 14, 2024

These are my comments and questions regarding the housing element. I live in the Downtown Specific Plan area. The programs in this element seems to unfairly affect this area. This is the oldest neighborhood in the city. I'm asking that you reduce the amount housing as this very limited, reduce the programs and apply them to all areas of the city and address the inconsistencies with the downtown specific plan.

1. A notice of the this public comment period was not posted or published in the local newspaper (Riverbank News) as required by the state. There is no representative for my area at this time as the council member resigned.

2. Downtown Specific Plan: The Housing Element states the Downtown Specific Plan (DTSP) is identified as an infill opportunity area and that a "Downtown Specific Plan EIR" adopted March 25, 2013 suggests 53 additional single family units, 832 multi-family dwelling units. Per the Downtown Specific Plan the infill area is the downtown core only. In 2009 the downtown area of Third and Santa Fe (from 2nd to 4th) was an RDA project and the Cannery Reuse Plan was approved. Their numbers were 53 single-family dwelling units and 454 higher density dwelling units. The 2013 EIR was focused on the cannery plan only. The RDA project became what would be the Downtown Specific Plan and extended to 7th St. (See Cannery Reuse Plan). The EIR had limited elements-it did not include housing or land use. It did not include the RDA project. The EIR was approved in 2013 as the Downtown Plan. On May 12, 2015 the Specific Plan was approved. They used the Cannery Reuse Plan EIR as the EIR for the DTSP . It has no land use or housing element. The DTSP was amended to 4th St. and the Cannery plan never happened and is now a commercial cultivation and manufacturing plant. The DTSP Code created the Downtown Historical District. The DTSP's Code protects and preserves the Specific Plan area, the Historical District and the pre-existing residential area . The Downtown Specific Plan area is now 4th to Calendar-minus the cannabis plant. Why are the dwelling numbers above not matching? Why haven't the number of dwelling units been adjusted down to be compatible with the small amount of land now available downtown? This housing element is inconsistent with the DTSP as to the infill. Also, as the 2013 EIR was done 2 years before the specific plan its information is inaccurate.

3. Rezone Program Allows city to rezone land for remaining lower and moderate income housing needs-790 units Table X states 1,656 units. What is this program? Where did these figures come from? What areas will these units be built? When did the community have input on the sites to be rezoned?

4. A foundational policy of the General Plan is that future growth shall not exceed the City's capability to provide infrastructure and services. Were any studies done showing what

services and infrastructure is available and where?

5. Program 2.1g allows transitional and supportive housing in R-1 and R-2 zoning and C-1, C-2 and C-M zoning only. What is transitional and supportive housing?
Program 2.1k This program allows single room occupancy units only in R-1 and R-2 What are single room occupancy units? Why are transitional and supportive housing and the single room occupancy units not allowed in the specific plan areas on the west side?

6. Program 3.1d Reduces parking standards by requiring onsite parking. Also narrowing streets and requiring parallel parking. Streets downtown are wide because it was necessary when the city was built. This would be inconsistent with the Downtown Specific Plan pg. V11-5 V11-6

7. Program 2.2a This program encourages replacement of existing housing by allowing two to one replacement in the Downtown Specific Plan area. Refers to redevelopment projects-What redevelopment agency is involved?

8. Program 2.2b This program encourages developers and property owners to become partners with the city to purchase land What is the implementation of the Specific Plan referring to.

9. Program 2.2c This program encourages development of upper stories and mixed use buildings in Downtown Specific Plan Downtown Core. As the City knows the older historical buildings in the specific plan area including the downtown core probably could not handle more stories. This is inconsistent with the specific plan. The city did a survey of the historical buildings-please provide it.

10. Energy-it states that PG&E provides gas service and MID provides electricity. PG&E provide electricity to a large part of the city including downtown and the east. Is the city changing our service?

11. Riverbank Land Use Plan Appendices K There is a map of River walk. Where is the Riverbank Land Use Plan? What is it? Please provide this document.

12. Impact It appears there will be large impact on downtown residents and businesses. Where are the studies on the impacts? How many will be displaced? What will the impact to the downtown residents and businesses? How will you help the displaced? Please provide information.

This housing element appears to be mostly affecting the downtown specific plan area. Your zoning for the programs seem to be in that area. There are inconsistencies in the housing element and the downtown specific plan. I would appreciate your response to my comments

and questions.

Thank you

Evelyn Halbert

Farmland Working Group

STRIVING TO PROTECT FOOD, FAMILIES AND FARMLAND

November 12, 2024

Joshua Mann
Planning Director
City of Riverbank
jmann@riverbank.org

Dear Mr. Mann,

The Farmland Working Group (FWG) appreciates the opportunity to comment on the City of Riverbank's 2023-2031 Housing Element. Since 1999, FWG has been committed to preserving the agricultural foundation of our region and promoting smart growth in our urban communities through education, outreach and action.

After reviewing the draft 2023-2031 Housing Element, FWG has concerns regarding the accuracy and validity of the claim made on page VI-16 that "the City lacks sufficient land available and designated for multi-family development to provide for the needs of all income groups." More specifically, the draft Housing Element points to a shortfall of 436 units for extremely low to low-income categories and 354 units for moderate income categories. This claim of a lack of holding capacity to comply with RHNA is inconsistent with claims made in Riverbank's previous Housing Element, as well as the current draft 2023-2031 Housing Element.

In Riverbank's 2014-2023 adopted Housing Element, the City identified a surplus of 1,563 units in the extremely low through moderate income categories by including holding capacity within and outside City limits. In the current draft Housing Element, the holding capacity outside the City limits is not included, resulting in the shortfall. If the City was to include the existing holding capacity outside the city limits, as it did in its previous Housing Element, the result would be a surplus and put Riverbank's Housing Element in compliance with State law.

Farmland Working Group would strongly encourage the City of Riverbank to include all the candidate sites listed on table VI-10 as part of its holding capacity within the City limits. In the current draft, only three parcels (APN 132-022-017, APN 075-005-025, APN 132-023-020) on table VI-10 are factored into the City's holding capacity. This adjustment alone would allow the Housing Element to be in compliance with State law. On page VI-6, the report states that the Downtown Specific Plan can accommodate 832 multi-family dwelling units, the draft Housing Element only allocates 586 units for extremely low through moderate income categories. FWG asks that the report adjust the City's stated holding capacity to reflect this. The City of Riverbank should factor in additional lower income housing resulting from homeowners splitting parcels in compliance with Senate Bill 9 (SB9), as the City of Turlock has done in its Housing Element.

Clearly, Riverbank has adequate holding capacity to comply with State law at all income levels. Submitting a Housing Element that is out of compliance with State law would be irresponsible. FWG asks that the City of Riverbank make the necessary adjustments to reflect its accurate holding capacity. In doing so, Riverbank would correctly prioritize infill development which benefits taxpayers and rate payers, resulting in the construction of more affordable housing and lessening negative impacts to the surrounding agricultural community. It is also worth stating that an inaccurate Housing Element would not provide the necessary information from which to base future General Plan updates.

Farmland Working Group welcomes any feedback and looks forward to staying constructively engaged.

Sincerely,
Jeani Ferrari, Chairperson
Farmland Working Group

November 6th, 2024

City of Riverbank
Attn: Joshua Mann. Planing Director
6707 3rd Street
Riverbank, Ca95367

RE: Draft Housing Element Upate

To Whom it may concern:

I am submitting the following comments on the City of Riverbank 'Draft Revised Housing Element for the period 2023-2031'

General comment: Having reviewed the entire 275 pages including the tables and appendices I applaud City Staff for untaking a difficult and challenging task. I greatly appreciate the thougtfulness, and details of the overall housing situation for the City. I can see many hours of work to grapple with a complex issue.

Now to specfic comments:

1. **On I-4**. It states: "To date, the City has pursued a market-based strategy to meet its residents' housing needs. The City has designated lands for diverse types of housing at several density levels, including land for multi-family housing, which could meet a portion of the lower- and moderate-income housing needs. The City does not require developers to construct housing at the maximum allowed density.

   Market decisions made by individual developers have traditionally determined timing and types of housing constructed. The City of Riverbank cooperates with private and/or nonprofit developers interested in building affordable housing projects and helps them to identify economic incentives and government subsidies. The City has also begun to consider requesting that new developments include mix of housing types, including multifamily housing, in order to make up for the lack of such housing in the current inventory."

   Comment: I strongly recommend the City revist this market based strategy so the city can build out the shortfall in the extremely low, very-low and moderate- income level housing units.[1] Later in the housing element there are discussion points and areas of opportunities for the city to meet the demand for the above listed housing units. Market decisions are based on Stakeholders, interest rates, affordablity of the applicant, government support, job location, location, utilities, etc. Also listed in this document under section regarding stakeholders in the building industry are general builders as well as non profit builders such as 'Dignity Moves' who build tiny homes[1] for the above categories of housing.

2. On I-5. Public participation.

   Comment: It is evident that the public did get to comment on the housing element thru a survey and 'ONE' Public meeting which was annouced thru the various forums. I will not note those forums. However, based on the public input of 8 people and 75 survey respondents and interested parties it appears the city staff and vendor was only fulfilling the 'basic' requirement. I strongly recommend that the city use all means possible and conduct multiple community meetings thru out the city.

The City is very multicultural(Table II-6) and meeting people where they currently live, work, shop, play would gather further information. This would bring to the table the human side of the housing delimma in Riverbank.

3. On I-5 and I-6. Residential Developers, Housing service providers.

   Comment: While this is an extensive list of stakeholders representing builders, providers and related vendors, the City forgot important groups such as the Farm Bureau, California Land Trusts, Farm land working group,Valley land alliance, Center for Land base learning, and most important residents from the community and including those unincorporated areas such as River Heights, River Cove and other areas within the city limits.

4. Build up housing. In this housing element draft little consideration is given to building up. Below is a current project under construction(See Fig. 1).

   Comment: by building up would provide considerable housing units when strategically placed such as the 'Cannery' site just west of the Railroad(See fig 2). I strongly recommend the city consider this option for the cannery site as a means to vitalize the downtown area

Figure 1- Example of Housing building up to three stories

Location: Coffee and Sylan road in Modesto[1,4,,5]

5. IN- Fill projects:
   Comment: I really appreciated the overall work on in fill projects by city staff

   On IV-3. It states that "there are 46.7 acress of underdevleoped and underutilized land zoned R-1,R-2, and R-3 which would provide sufficient capacity to accommodate the need for supportive housing'. In addition to this is a master listing titled 'Summary of Vacant areas in the City of Riverbank'. I received this document under an information request from the City. I have attached this document as part of my comment and further evidenced under appendix H-1 to H-11 In Summary there are 48 single Family residential sites covering 23.65 acres and 11 residential sites in Downtown Riverbank covering 32.59 acres. This totals 56.24 acres and potentially be used for build out and if you use the Citys density formula of 10, 15 and 20 units per acre generate could generate 1124 residential units. It appears that all sites have utilities but other

factors may preclude the utilization of the inventory such as market factors, builder interest, environmental hazards and current land owners willingness to sell.

Figure 2. The 'Cannery' in Davis California[5]

6. Riverwalk Project. Proposed 2200 homes.[6]

Comment: The Riverwalk project is proposed to be on 'Prime Ag Land' with 12 properties within the site under 'Williamson Act' Designation. The Riverwalk project at this time is still under the draft element and had 88 public comments and 14 public agency comments expressing considerable interest and opposition. Currently, the city placed this project within its housing needs for 2023 to 2032.

Page Vl-16 of the referenced document states that the River Walk project is "currently being processed." For clarification, the River Walk project is a proposed project that may or may not ultimately be approved. The project application was submitted to the City in 2019, although the

general public was not aware of the proposed project until the Notice of Preparation was released in June 2021. Following this, it took two and a half years for the Draft Environmental Impact Report to be released (late January 2024); the comment period for which closed just recently in mid-May 2024. Given this, to characterize the River Walk project as "currently being processed" is a large exaggeration. In addition, if the RHNA numbers are accurately reflected in the draft Housing Element for 2023-2031), there should be no justification for mentioning or including for the proposed River Walk project. The proposed River Walk project is neither an approved nor a pending project and, as such, it cannot be used to demonstrate compliance with the RHNA numbers and should be removed from the draft.

Back ground information:

On September 10, 2024, the Riverbank City Council approved Item No. 11.3 on their agenda

titled "Acceptance of Certificate of Initiative Petition Entitled 'Voter Approval Required to Allow

Development of Urban Uses on Agricultural or Open Space Lands Located West of Riverbank City Limits,'

and submitting the Initiative to the Voters at a Future Regular Election." This ballot initiative has qualified with 1500 validated signatures for and will be placed on the November 2026 General Election. If approved by the Riverbank voters, would impact the local setting and whether additional housing could be constructed along the City's western boundary as the Riverwalk project would expand the 'sphere of influence' for the City of riverbank and require LAFCO review and approval.

Why does the draft Housing Element overlook this significant component? This oversight should be corrected and a full discussion of the pending ballot initiative should be included.

If the proposed River Walk project is to remain in the draft Housing Element (begins on Page VI-12), HCD should take a careful look at what it proposes (2,432-2,682 units on nearly 1,000 acres of prime ag land).

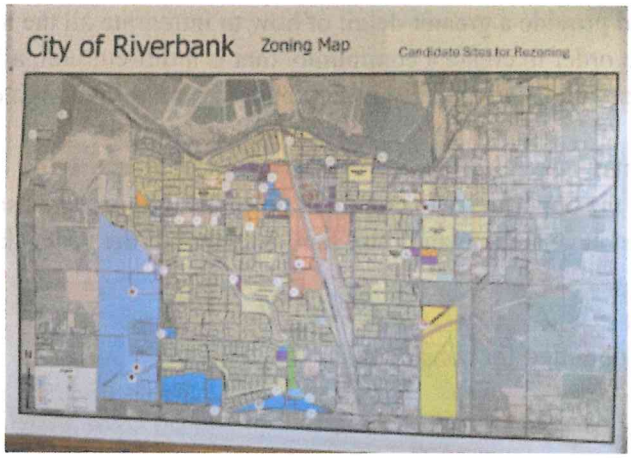
It would be a high-end development project that primarily consists of single-family dwellings.

Only 1 multi-family unit is proposed, but that is not guaranteed because it is characterized as either multi-family or commercial. Riverbank's current RHNA numbers project a 704-unit surplus of above moderate-income level units and the River Walk project, as currently proposed, would continue the market-driven trend. Does the River Walk project and its recommended densities and mix of development types, aligned with the goals and policies of the draft Housing Element? My comment is the riverwalk project reflects growth on Prime Ag Land. The City of Riverbank needs to add to its housing element discussion and the consequences of removing 'prime Ag Land' and the impact for the next 100 years! Additionally the riverwalk project will not meet the superlow, low income housing needs and as such further disscussion by the city needs to be included in the housing element.

7. Housing Production Opportunities Section VI under Govenance code65583(a)(3) sites availablity for City of Riverbank!

Comments:

First, I applaud city staff for the level of detail regarding Inventory of Land, assumptions and methodology, vacant land, and underutilized land. I would suggest that other inventory should include city property and its present use and future use… For Example, Currently the city is looking at a new location for city hall, and locations of any Fire department sites, and city support facilities. Below is the map provided at the public forum on housing and indicates about 51 sites for housing both vacant and underutilized.



Second, Future housing[3] sites should also have open spaces, parks, bicycle paths and how these spaces fit within the scope of any of the areas including Crossroads west, tiny homes,ADUs, east riverbank, Downtown sites. Please exclude the river walk project as this is not under the sphere of influence of the city, See comments under point 6 above

Third, Pipeline projects should be updated to include all projects as of November 1st 2024.

The Riverwalk project should not be included in this housing element as it has not been approved by the voters, City council and the Stanislaus LAFCO.

Question: do the pipeline projects decrease the number of proposed sites when looking at the 3591 housing units from RHNA?

Question: Would these 'pipeline projects' create housing units available for the extremely low, very low, low, moderate, and above moderate-income households. .. for Example the tiny homes project titled 'Lucky House'

Fourth, Page VI-16 states the following:

"Presently, the City of Riverbank has enough land available to meet the RHNA for Above Moderate income with a surplus of 704 units. However, the City of Riverbank does not have enough land to accommodate its total RHNA for low and moderate income with an aggregate shortfall of 790 units. In compliance with the requirements of Government Code Section 65583(c)(1), the General Plan Land Use Element should provide a sufficient portion of land in its multi-family land use categories to meet its obligation to provide sites suitable for the production of needed housing affordable to extremely low, very low, low, moderate, and above moderate-income households. As the analysis above shows, at average densities, the City lacks sufficient land available and designated for multi-family development to provide for the needs of all income groups."

Comment: The city did an extensive site inventory for the entire City of Riverbank including Vacant land and underutilizied sites.. Appendix H pages H-1 to H10 indicates significant sites which should be considered over the 2023 to 2031 housing element period. Yes, there are challenges to all these sites but in order to meet the "need" of the extremely low, very low, low, moderate, and above moderate-income households should be revisited.

The city should provide a greater detail of how to intregrate all the housing categories within the 'open space' in order to create a community that is multi-cultural, affordable and consistent with its general plan. It appears the city is only building out mid to high end homes.

Final Comments:
Thank you for the opportunity to comment on such an important issue. All of us want to live in a city that we can have a home and raise families thru out the years ahead

Respectively submitted for consideration

Garry Pearson
2209 Cedarwood Circle
Riverbank, Ca 95367
Email: garrypearson@sbcglobal.net
Cell 530-681-6577

CC: Housing and Community Development @ HousingElements@hcd.ca.gov

References and Resources

1.Example of Tiny projects https://www.modbee.com/news/local/article263713708.html

2 .Cost for construction ranges from $260.00 to $300.00 per square foot. Per PMZ Local Real Estate Agent
3. Average price in Riverbank. **$479,433 Source: www.Zillow.com**
4. https://stanregionalha.org/programs/affordable-housing/
5. The Cannery: https://www.swagroup.com/projects/the-cannery/
6. Riverwalk project: https://riverbank.org/609/River-Walk-Project

Attachments:

1. Summary of vacent areas in city of riverbank. Obtained under the Public information request.
    a. Draft Vacant Site List. PDF
    b. Draft Vacant Site List - DTSP Area.pdf

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08.08.2024

VACANT SITE LIST

Site Number	Assessor Parcel Number	Address	Gross Acres
Single Family Residential			
V1	075-005-013	2531 W. Stanislaus Street	0.99
V2	075-005-025	0 Jackson Avenue	1.08
V3	075-005-026	6719 Jackson Avenue	0.95
V4	075-017-001	5930 Terminal Avenue	0.2
V5	075-017-020	0 Kentucky Avenue	0.14
V6	075-039-002	0 Terminal Avenue	0.33
V7	075-045-039	0 Roselle Avenue	1.29
V8	075-048-002	2812 River Cove Drive	0.59
V9	075-048-003	0 River Cove Drive	0.75
V10	075-052-044	2608 Briarcliff Drive	0.35
V11	075-056-031	0 Briarcliff Drive	2.09
V12	075-057-002	0 Zellman Court	0.14
V13	075-057-003	0 Zellman Court	0.12
V14	075-057-004	0 Zellman Court	0.12
V15	075-095-008	3206 Walnut Lane	0.14
V16	075-095-009	3212 Walnut Lane	0.11
V17	075-095-010	3218 Walnut Lane	0.11
V18	075-095-011	3224 Walnut Lane	0.12
V19	075-095-019	5573 Landon Drive	0.16
V20	075-095-021	5561 Landon Drive	0.13
V21	075-095-024	3207 Walnut Lane	0.2
V22	075-095-032	3202 South Rose Brook Drive	0.2
V23	075-095-033	3208 South Rose Brook Drive	0.19
V24	075-095-034	3214 South Rose Brook Drive	0.16
V25	075-095-035	3215 South Rose Brook Drive	0.18
V26	075-095-036	3209 South Rose Brook Drive	0.16
V27	075-095-037	3203 South Rose Brook Drive	0.15
V28	075-095-043	3206 Sutton Road	0.16
V29	075-095-045	5631 Landon Lane	0.13
V30	075-095-046	5625 Landon Lane	0.13
V31	075-095-047	5619 Landon Lane	0.13
V32	075-095-048	5613 Landon Lane	0.13
V33	075-095-049	5607 Landon Lane	0.13
V34	075-095-050	5601 Landon Lane	0.16
V35	075-095-058	5642 Landon Lane	0.13
V36	075-095-072	3139 Sutton Road	0.14
V37	075-095-073	3133 Sutton Road	0.12
V38	075-095-074	3127 Sutton Road	0.13

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V39	075-095-076	5627 Pierce Lane	0.13
V40	075-095-077	5621 Pierce Lane	0.12
V41	075-095-087	3104 Pocekt Avenue	0.21
V42	075-095-089	3106 Pocket Avenue	0.21
V43	132-035-010	0 Burneyville Road	0.08
V44	132-036-013	0 Rocky Lane	0.24
V45	132-048-016	6509 Claus Road	1.95
V46	132-049-041	0 Eighth Street	0.22
V47	132-049-042	0 Eighth Street	0.23
V48	132-049-043	0 Eighth Street	0.23
V49	132-049-044	0 Eighth Street	0.22
V50	132-057-010	0 California Avenue	0.16
V51	132-057-047	0 California Avenue	0.16
V52	076-016-002	5913 Terminal Avenue	0.17
V53	132-015-023	0 7th Street	1.17
V54	132-015-025	0 Front Street	0.57
V55	132-015-026	3737 Front Street	0.34
V57	132-045-002	6145 Claus Road	4.45
V58	132-051-018	0 Ross Avenue	0.15

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08.08.2024

VACANT SITE LIST
DOWNTOWN SPECIFIC PLAN AREA

Site Number	Assessor Parcel Number	Address	Gross Acres
X1	132-010-057	6709 1st Street	0.14
X2	132-017-027	6412 2nd Street	0.18
X3	132-017-032	6426 2nd Street	0.16
X4	132-017-033	6430 2nd Street	0.21
X5	132-034-020	2906 Santa Fe Avenue	26.97
X6	132-023-020	0 Santa Fe Avenue	3.1
X7	132-022-017	2907 Patterson Road	0.74
X8	132-022-010	2924 Sierra Street	0.24
X9	132-011-052	0 Sierra Street	0.14
X10	132-011-053	3141 Sierra Street	0.57
X11	132-011-054	-	0.14

November 14th, 2024

City of Riverbank
Attn: Joshua Mann. Planing Director
6707 3rd Street
Riverbank, Ca95367

RE: Draft Housing Element Upate

To Whom it may concern:

I am submitting the following comments on the City of Riverbank 'Draft Revised Housing Element for the period 2023-2031'

First,
The proposed cannery site would provide substantial opportunities for multi-family units as well as opportunities for building two to three stories housing. This project would greatly improve the downtown cultural aspects of the city of Riverbank. This is part of the 2015-16 Downtown specfic site
Source: https://www.riverbank.org/DocumentCenter/View/505/Final-DTSP---May-12-2015

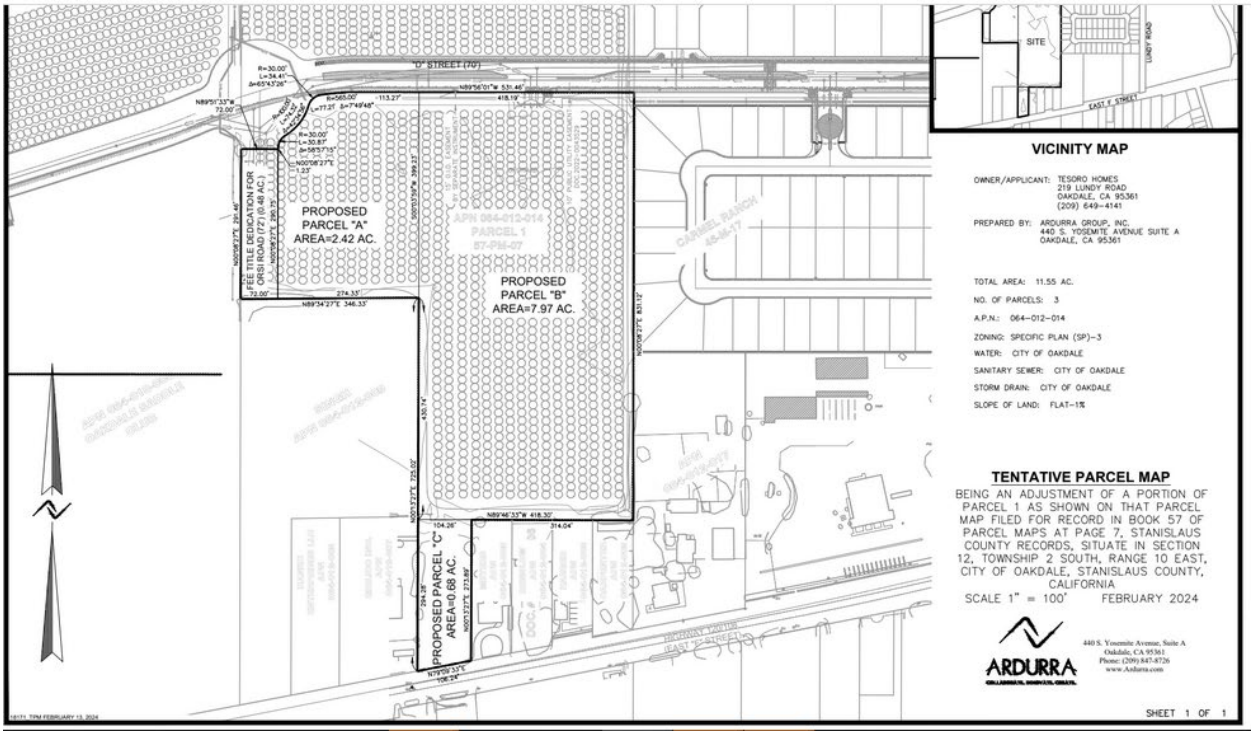
Opportunity Sites Diagram

Second,
In-fill projects. The housing element presents numerous in-fill projects that would meet all the housing needs for the next 20 years. In fill projects should be inclusive of tiny homes, mobile homes of all sizes, accessory housing units, grannie flats, and lot splits.

Third, Building up.

Riverbank should take every opportunity to build up for meeting the next cycle of housing

Fourth, Regional summit..
I agree that the City staff, Council and planning commission proceed at 'Warp' speed to establish an ongoing and continuous discussion regarding housing with inclusive options, all in-fill projects, rental opportunities, build up and all categories of housing. If there is a truly housing crises.. then solutions are at hand and can meet the needs of all the housing categories. Riverbank should take every opportunity to engage with other cities like oakdale, Modesto, Waterford and Escalon on the housing needs. For example from Oakdale, see link here


"D" STREET (70')
PROPOSED PARCEL "A" AREA=2.42 AC.
PROPOSED PARCEL "B" AREA=7.97 AC.
PROPOSED PARCEL "C" AREA=0.68 AC.
FEE TITLE DEDICATION FOR ORSI ROAD (72') (0.48 AC.)
APN 064-012-014 PARCEL 1 57-PM-07
CARMEL RANCH 45-M-17
HIGHWAY 99/99 EAST "F" STREET
SITE
LUNDY ROAD
EAST F STREET
VICINITY MAP
OWNER/APPLICANT: TESORO HOMES
219 LUNDY ROAD
OAKDALE, CA 95361
(209) 649-4141
PREPARED BY: ARDURRA GROUP, INC.
440 S. YOSEMITE AVENUE SUITE A
OAKDALE, CA 95361
TOTAL AREA: 11.55 AC.
NO. OF PARCELS: 3
A.P.N.: 064-012-014
ZONING: SPECIFIC PLAN (SP)-3
WATER: CITY OF OAKDALE
SANITARY SEWER: CITY OF OAKDALE
STORM DRAIN: CITY OF OAKDALE
SLOPE OF LAND: FLAT-1%
TENTATIVE PARCEL MAP
BEING AN ADJUSTMENT OF A PORTION OF PARCEL 1 AS SHOWN ON THAT PARCEL MAP FILED FOR RECORD IN BOOK 57 OF PARCEL MAPS AT PAGE 7, STANISLAUS COUNTY RECORDS, SITUATE IN SECTION 12, TOWNSHIP 2 SOUTH, RANGE 10 EAST, CITY OF OAKDALE, STANISLAUS COUNTY, CALIFORNIA
SCALE 1" = 100' FEBRUARY 2024
ARDURRA
440 S. Yosemite Avenue, Suite A
Oakdale, CA 95361
Phone: (209) 847-8726
www.Ardurra.com
SHEET 1 OF 1

David Niskanen

From: Joshua Mann <jmann@riverbank.org> on behalf of Joshua Mann
Sent: Wednesday, November 13, 2024 8:50 AM
To: David Niskanen; Michael Arroyo
Cc: Planning
Subject: FW: Housing Element Riverbank CA

New email received this morning

Joshua E. Mann
Community Development Director

Phone: (209) 863-7124
Fax: (209) 869-7126
Email: jmann@riverbank.org

6707 Third Street
Riverbank, CA 95367

www.riverbank.org

Monday-Thursday, 7:30AM-5:30PM
~ CLOSED ALL FRIDAYS ~

From: Gretchen <glbbwest@gmail.com>
Sent: Tuesday, November 12, 2024 4:32 PM
To: Joshua Mann <jmann@riverbank.org>; HousingElements@hcd.ca.gov
Cc: Gretchen Brown <glbb410@gmail.com>; Karen Conrotto <kconrotto@gmail.com>
Subject: Housing Element Riverbank CA

Mr. Mann and others:

I am writing to comment on the proposed Housing Element for Riverbank for the City's Revised Draft Housing Element for 2023-2031. I have a few concerns:

1. One of your opening paragraphs states: Market decisions made by individual developers have traditionally determined timing and types of housing constructed. The City of Riverbank cooperates with private and/or non- profit developers interested in building affordable housing projects and helps them to identify economic incentives and government subsidies. The City has also begun to consider requesting that new developments include mix of housing types, including multi- family housing, in order to make up for the lack of such housing in the current inventory.

May I suggest that rather than letting the developers decide timing and types of housing built, that the City take the LEAD in planning for their future community? Furthermore, rather than *beginning to consider requesting that new developments include mix of housing types, including multi- family housing, in order to make up for the lack of such housing in the current inventory* as stated, that the City do more and take concrete steps to make these important decisions themselves based on community needs rather than being led by developers. Letting developers make decisions on timing and types of housing is great for the developers but not necessarily great for our communities.

A case in point is affordable housing. The 2022 median household income of Stanislaus county residents (latest figure I could find) is $74,872. "Affordable housing cost" for lower-income households is defined in State law as not more than 30 percent of gross household income with variations (Health and Safety Code Section 50052.5). Using these figures, affordable housing for a Stanislaus county household and by extrapolation Riverbank community would be $22,461.60. I think we can safely agree that only a tiny percentage of Riverbank housing could qualify as "affordable." We need to increase the amount of affordable housing we offer the Riverbank community; not just add more and more single family dwellings like I've been seeing in, for example, the Crossroads area.

2.Water Availability. My dwelling is part of a community that shares a community well. Our well water has dropped 25 feet in the last 10 years. I don't see anything in the Housing Element that addresses water availability. This is a pressing issue now and won't get any better. What are plans for water allocation and usage in this draft?

3 River Walk. Riverbank is "in the planning stages of processing the River Walk Specific Plan" and states this again on Page VI-16. Considering that River Walk has not yet been approved and has not even advanced enough in the process to be considered a "pending project," it should not even be included in the Housing Element. I am quite concerned about this proposed development, particularly about its water usage and effect on riparian habitat. Even though it's not yet been approved we are very aware that Riverbank City has its sights on this large, ill-conceived project. Let me repeat: since it has not yet been approved, River Walk should not even be included in the Housing Element for 223-2031.

Thank you for the opportunity to comment on the Revised Draft.

Gretchen Brown
glbbwest@gmail.com
+1 (704)451-5889 PST

November 3, 2024

City of Riverbank
Attn: Joshua Mann, Planning Director
Sent Via Email to: jmann@riverbank.org
6707 3rd Street
Riverbank, CA 95367

RE: DRAFT HOUSING ELEMENT UPDATE

To Whom It May Concern:

Please accept and consider the following comments on the City's Draft Revised Housing Element for the period of 2023-2031:

1. The referenced document includes the following statement: "To date the City has pursued a market-based strategy to meet its housing needs and developers have determined the timing and types of housing construction. The City has also *begun to consider* requesting that new development include a mix of housing types." Because the City has consistently allowed developers to determine the type of housing construction, the City has primarily added only above moderate-income level housing in recent years, and in fact had a surplus of this housing type in the prior 8 to 9-year Housing Element cycle (2014-2023). The City needs to do more than just "begin to consider" requiring developers to include a mix of housing types as it has a serious shortfall in the extremely-low, very-low, low and moderate-income level housing units. Specifically, the City needs to require same and provide incentives for doing so.
2. Expanding upon Comment No. 1, above, the referenced document also says the following on Page IV-8: "Most homes in Riverbank are made available in the commercial marketplace through the efforts of the housing industry, and it's expected that housing construction and occupancy will continue (emphasis added) to primarily be a function of private market forces." As stated above, the City needs to do more than just "begin to consider" requiring developers to include a mix of housing types in order to correct the serious shortfall in the lowest income level housing units.
3. In the preparation of a Housing Element, the following is required: "The local government shall make a diligent effort to achieve public participation of all economic segments of the community (emphasis added) in the development of the Housing Element." Riverbank's efforts to achieve public participation were focused on City residents rather than the community, including the survey that it prepared and circulated. I personally am an interested party who lives outside the City limits, but in an area the City wishes to annex. As an interested party, I asked to complete the survey but was unable to answer many of the questions because I do not live in the City. Because of this, the survey was biased.
4. In the City's efforts to achieve public participation, it determined that the "stakeholders' included only the following: developers and service providers, and again, efforts were targeted at only these groups. There are many other stakeholders who have interest, but those groups

were excluded including the following: the residents of the River Heights/Park Ridge area which are immediately adjacent to, but just outside the City limits; a group that has been very involved and vocal about City matters historically, and persons like myself who live in an area the City wishes to annex – specifically, the proposed River Walk project area. Because of this short-sighted approach, many other stakeholders were excluded. If the City had done a better job of outreach for their July 31, 2024, public workshop, there very likely would have been far more than 8 members of the public in attendance.

5. Table 11-1: Population and Growth Rates. The Table states that the growth rate is 6.9%. The correct figure is 6.75%. For clarity, it is suggested that the average annual growth rate for this period which was 0.675%, should also be shown, which include 2 years of negative growth rates.
6. Table 11-2: Projected Population Growth. This Table projects Riverbank's population in 2025 (which is only 2 months from now) to be 28,223 or 3,297 higher than it was in 2020; a 13.2% increase. DOF reports that Riverbank's population was 25,006 this year (in 2024). Is there an assumption being made that the population will grow by 3,217 persons in a matter of just a few months? Please clarify as this seems to be an inaccurate representation.
7. Expanding upon Comment No. 1, above, Table 11-6 which depicts Ethnic Groups shows that Riverbank's Hispanic/Latino population is growing. Specifically, in 2010 this sector represented 52.13% and in 2020 it was 56.14%. In addition, the City's survey results indicated that 61% of the respondents said the "affordability" of housing was their top issue/concern, but the City has yet to address this need by continuing to let developers determine what type of housing units to build (meaning, above moderate-income level). This is further demonstrated in Section III – Housing Stock which states that of the 7,634 housing units, 86% are detached, single-family homes where zero growth occurred in multi-family units between 2020-2023 while single-family units continued to increase. The City needs to take decisive steps/actions to ensure that housing units that address the low and moderate-income level needs are met.
8. Page 11 of the referenced document refers to Costco as "under construction." The new Costco opened several months ago so this should be corrected.
9. Page III-5 of the referenced document discusses housing costs and refers to someone named "Cary Pope" as the information source. Who is Cary Pope and what are their credentials? This section further describes the cost for "raw materials" but makes no mention of land cost(s). Lastly, this section should clarify that the median home value for Riverbank was $461,094.
10. Table III-9 of the referenced document contains a typographical error as follows: Above Moderate-Income should be 2,778 vs, 2,2778.
11. Page III-10 of the referenced document discusses subsidized housing which has been constant at 90 units since 1952 (i.e., for the past 72 years). This section goes on to state that Riverbank has "recently entered into an agreement" which may provide additional growth in this sector, but does not say when the agreement was entered into, nor does it address the timing of when additional units may be provided. More information on how this new agreement would assist with subsidized housing should be included.
12. Table IV-2 of the referenced document indicates that 81.2% of Riverbank households are "over paying" on housing costs, meaning that their housing costs exceed the 30% threshold. The Table also indicates that Riverbank should have 970 dwelling units for the very low-income category yet it has only 740. How will the new "Program 2.1b" which has been added specifically address this need/shortfall?

13. Page IV-8 of the referenced document indicates that Riverbank met about 80% of the above moderate-income level housing units but only 13% of the very low- and low-income level housing units for the previous (2014-2023) housing element cycle. This is a trend that will continue if the River Walk project, as currently proposed, is approved. In particular, the Housing Element does not address how the River Walk project, as currently proposed, will impact infill project opportunities in the City, which should be given priority, nor does it address equity issues and the ethnicity of Riverbank. If one looks at the River Walk Specific Plan and the renderings it includes, it is quite obvious that the project does not address the ethnicity of Riverbank and is biased toward the clientele it is intended to attract. Is the draft, as currently written, sufficient to demonstrate the requirement of Assembly Bill 686 which requires that the housing element update "Prepare the housing element land inventory and identification of sites through the lens of affirmatively furthering fair housing" (as noted on Page V-2)?
14. Table IX-2, Policies and Goals. It would be helpful if the newly added items were shown in some type of bold/highlighting/underlining so they are distinguishable from policies and goals that previously existed.
15. Policies and Goals item 5.1.b addresses Public Engagement yet there is no method of ensuring that the public, myself included, is notified of upcoming meetings/actions that address the Housing Element. I know this personally as I have asked the City to be notified and was told there is no automatic way to ensure that a person is notified on matters related to the General Plan. I also requested to be listed as an "Interested Party" on the Housing Element update, yet I received no notifications from the City until I brought up this point during Public Comment at a City Council meeting. This warrants needed improvement to ensure public engagement.
16. Again regarding Public Engagement, Page IX-18 of the referenced document states that the City "will partner with local churches." The City needs to also include that it will partner with local interest groups and maintain a list of interested parties/groups. Partnering only with local churches will exclude other interest groups and limits public engagement opportunities.
17. Page VI-16 of the referenced document states the following: "...the City of Riverbank does not have enough land to accommodate its total Regional Housing Needs Assessment (RHNA) for low and moderate income with an aggregate shortfall of 790 units." The same paragraph also says this, "... the City lacks sufficient land available and designated (emphasis added) for multi-family development to provide for the needs of all income groups." These are confusing statements due to the following: A) Page VI-17 includes Table VI-10 which lists 15 properties which are "candidate sites for rezoning" to multi-family and states that "The 15 sites will be (emphasis added) rezoned..." Since these sites "will be" rezoned, it seems inaccurate to state that the City lacks sufficient land available; B) In the City's Housing Element for the prior cycle (2014-2023), a total of 2,307 housing units were available in the extremely low, very low, low and moderate-income levels. Of those 2,307 units, 76 were constructed during the cycle (as per Table IX-1) which leaves 2,231 that should still be available, yet the new draft Housing Element does not include this – why? Since Riverbank's new RHNA target number for the 2023-2031 cycle is 2,236, this would only leave a shortfall of 5 units if this information was included; and C) This shortfall of 5 units would easily be met by the planned rezoning of the 15 properties listed in Table VI-10, yet all but 2 of those properties (Site Nos. 11 and 13) are excluded from Appendix H. Why are the other 13 Sites not included in Appendix H (Site Inventory)? Even if one looks only at the numbers presented in the new draft Housing Element which shows a shortfall of 790 units, if all

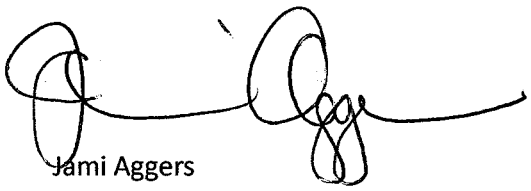
15 sites that will be rezoned will generate 1,656 units then there would still be a surplus of 866 units, yet the draft states that the City lacks sufficient land. Please clarify.

18. Please show the total acreage to be rezoned in Table VI-10 (82.78 acres).
19. Page VI-16 of the referenced document states that the River Walk project is "currently being processed." For clarification, the River Walk project is a proposed project that may or may not ultimately be approved. The project application was submitted to the City in 2019, although the general public was not aware of the proposed project until the Notice of Preparation was released in June 2021. Following this, it took two and a half years for the Draft Environmental Impact Report to be released (late January 2024); the comment period for which closed just recently in mid-May 2024. Given this, to characterize the River Walk project as "currently being processed" is a large exaggeration. In addition, if the RHNA numbers are accurately reflected in the draft Housing Element for 2023-2031 (as noted in Comment 17, above), there would be no need to mention/include the proposed River Walk project. The proposed River Walk project is neither an approved nor a pending project and, as such, it cannot be used to demonstrate compliance with the RHNA numbers and should be removed from the draft.
20. On September 10, 2024, the Riverbank City Council approved Item No. 11.3 on their agenda titled "Acceptance of Certificate of Initiative Petition Entitled 'Voter Approval Required to Allow Development of Urban Uses on Agricultural or Open Space Lands Located West of Riverbank City Limits,' and Submitting the Initiative to the Voters at a Future Regular Election." This ballot initiative has qualified for and will be placed on the November 2026 General Election, and if approved by the Riverbank voters, would impact the local setting and whether additional housing could be constructed along the City's western boundary. Why does the draft Housing Element overlook this significant component? This oversight should be corrected and a full discussion of the pending ballot initiative should be included.
21. If the proposed River Walk project is to remain in the draft Housing Element (begins on Page VI-12), HCD should take a careful look at what it proposes (2,432-2,682 units on nearly 1,000 acres). It would be a high-end development project that primarily consists of single-family dwellings. Only 1 multi-family unit is proposed, but that is not guaranteed because it is characterized as either multi-family or commercial. Riverbank's current RHNA numbers project a 704-unit surplus of above moderate-income level units and the River Walk project, as currently proposed, would continue the market-driven trend. Is the River Walk project and its recommended densities and mix of development types, aligned with the goals and policies of the draft Housing Element?
22. Riverbank should consider allowing multi-family units to be greater than 2 stories in height in order to maximize density.
23. Under Goals and Policies of the referenced document, Page X-3 states the following: "The City will take the following actions to identify and rezone, if necessary, higher density residential sites of equivalent capacity within 6 months to maintain a sufficient sites inventory to meet the City's RHNA." The only "actions" that are listed, however, are to track changes and update GIS. Given this, it seems that more specificity is warranted, such as the specificity that is included in items 2.1f and 2.1g and others. A suggestion would be to include a specific action that commits to rezoning the 15 sites that are listed in Table VI-10 since the document states this "will be" done.
24. Page X-5 indicates that "local farmworker organizations" will be invited as stakeholders. Please identify which local farmworker organizations were recently invited to the stakeholder meeting.

25. Page X-13, Program 5.1c of the referenced document should including partnering with local interest groups, in addition to churches, and maintaining a list of same (as mentioned in Comment No. 16, above) to ensure public engagement in the Housing Element process.
26. Page X-14 and Table X-1 of the referenced document identify "Quantified Objectives" and cite the new RHNA numbers as assigned by StanCOG. These numbers differ significantly from the RHNA numbers shown in Table VI-9 on Page VI-16 which is confusing to the average reader. Specifically, the total RHNA in Table VI-9 is 3,591 vs. 1,280 shown in Table X-1 for the same timeframe (2023-2031). It would be helpful if Section X explained these differences.

Thank you for the opportunity to review and comment on the draft Housing Element. Your consideration of the above comments is much appreciated.

Respectfully,



Jami Aggers
7730 McHenry Avenue
Modesto, CA 95356
Email:
Cell Phone: 209-450-5110

CC: Housing and Community Development @ HousingElements@hcd.ca.gov

David Niskanen

From: Joshua Mann <jmann@riverbank.org> on behalf of Joshua Mann
Sent: Tuesday, November 12, 2024 11:57 AM
To: David Niskanen; Michael Arroyo; Planning
Subject: FW: Riverbank Draft Housing Element Comments

More of the same Riverwalk comments

Joshua E. Mann
Community Development Director

Phone: (209) 863-7124
Fax: (209) 869-7126
Email: jmann@riverbank.org

6707 Third Street
Riverbank, CA 95367

www.riverbank.org

Monday-Thursday, 7:30AM-5:30PM
~ CLOSED ALL FRIDAYS ~

From: Marty Adrian <marty4adrian@gmail.com>
Sent: Friday, November 8, 2024 9:32 AM
To: Joshua Mann <jmann@riverbank.org>; HousingElements@hcd.ca.gov
Subject: Riverbank Draft Housing Element Comments

All interested parties,

I would like to comment on the inclusion of the Riverwalk project in the City of Riverbank's draft housing element. The Riverwalk project **should not** be included in the housing element because it is only a proposed project at this time. There are many steps that have to be passed before it becomes an approved project, including a citywide vote at the time of the next general election.

To me, this seems like the city planners are trying to "sneek the project in the back door" trying to circumvent the approval process. I hope you will see fit to remove the Riverwalk project from the draft housing element as it has no reason to be included at this time.

Thank You,
Marty Adrian

November 11, 2024

Dear Mr. Mann:

As the Riverbank Housing Element is prepared for finalization by the City Council, we feel that it is premature to make any reference to the proposed Riverwalk Project based on the following facts:

1. The proposed Riverwalk Project is not within the City of Riverbank's Sphere of Influence.
2. Over 1,700 registered voters signed a petition, accepted by the City Council, that any proposed annexation of the Riverwalk land, or any property outside of the City of Riverbank's Sphere of Influence, would go to a vote of all registered Riverbank residents. This vote will not take place until 2026.
3. There is no Environmental Impact Report for this property that has been approved.
4. The proposed Riverwalk Project is on prime farmland.
5. The proposed Riverwalk Project land is designated as a Wildlife Corridor and has be recognized as such by the California Department of Fish and Wildlife.

Based on the above listed facts, any mention of the Riverwalk Project in the City of Riverbank Housing Element documentation should be removed.

Thank you for your attention to this matter.

Sincerely,

Richard and Christine Holmer
2116 Park Ridge Dr.
Riverbank, CA 95367
rmholmer@gmail.com

SOLURI MESERVE
a law corporation

tel: 916.455.7300 · fax: 916.244.7300
510 8th Street · Sacramento, CA 95814

November 12, 2024

SENT VIA EMAIL
(cityclerk@riverbank.org)

City Council
City of Riverbank
6707 Third Street, Suite A
Riverbank, California 95367

Re: Agenda Item No. 11.1 (November 12, 2024 City Council Meeting)
Submission of Draft Sixth Cycle Housing Element to
Department of Housing and Community Development

Dear Mayor Richard D. O'Brien and Members of the City Council:

This firm represents Riverbank residents Annabel Gammon and Dr. J. Allen Gammon. The City's October 2024 Draft Sixth Cycle Housing Element fails to disclose the significant environmental, public services and infrastructure, Willamson Act, and other constraints associated with development of the River Walk Specific Plan. (Draft Housing Element, pp. VI-12-VI-14.) It should not be assumed that significant siting and other constraints can be overcome for this 1,522-acre site, about two-thirds of which is outside City limits. Attached are detailed comments and an expert report on ecology and wildlife submitted in May 2024 that explain some of the inadequacies of the January 2024 River Walk Specific Plan Draft Environmental Impact Report ("Draft EIR"). These and other comments received on the Draft EIR,[1] indicate that the River Walk Specific Plan should not be considered "suitable for residential development" by the City. (See, e.g., Gov. Gode, §§ 65883, 65583.2.)

We request that the River Walk Specific Plan should be removed from the City's Housing Element prior to submission to the Department of Housing and Community Development.

[1] There has been no indication of when or if the City's planning and environmental review process for the River Walk Specific Plan will continue beyond the Draft EIR stage. (See https://www.riverbank.org/609/River-Walk-Project.)

Very truly yours,

SOLURI MESERVE
A Law Corporation

By:
Osha R. Meserve

Attachment: May 16, 2024, Comments on the River Walk Specific Plan and DEIR

Sent via email to City Council Members:
Richard D. O'Brien, Mayor, robrien@riverbank.org
Leanne Jones Cruz, Vice Mayor, District 3, ljonescruz@riverbank.org
Luis Uribe, Councilmember, District 1, luribe@riverbank.org
Rachel Hernandez, Councilmember, District 2, rhernandez@riverbank.org
Darlene Barber-Martinez, Councilmember, District 4, dbmartinez@riverbank.org

cc: City of Riverbank, Housing Element
riverbankhousing@riverbank.org
Department of Housing and Community Development
HousingElements@hcd.ca.gov, Emily.Hovda@hcd.ca.gov
Annabel Gammon and Dr. J. Allen Gammon
annabel.gammon@gmail.com

For a full copy of this Comment Letter, please contact City of Riverbank, Community Development Department at riverbankhousing@riverbank.org or (209) 863-7124.

6/22/2025

Housing Element response dated cycle 6 2023-2032

2nd HCD Review Draft June 2025

Respondent: Garry Pearson, resident of Riverbank. 2209 Cedarwood Circle

First, The draft version that I downloaded was filled with numerous red changes. For this commenter I found very confusing. Since this version was in a PDF format as presented and it started as a word document then saved as a PDF causes untold confusion for me as a reader…. I do know how to clean this 'Mess' up with the Adobe PDF editor pro.

Second,

This is direct from the document

"Presently, the City of Riverbank has enough land available to meet the RHNA for Above Moderate income with a surplus of 190 units. **However, the City of Riverbank does not have enough land to accommodate its total RHNA for very low- and low- and moderate income with an aggregate shortfall of 790 units.** In compliance with the requirements of Government Code Section 65583(c)(1), the General Plan Land Use Element should provide a sufficient portion of land in its multi-family land use categories to meet its obligation to provide sites suitable for the production of needed housing affordable to extremely low, very low, low, moderate, and above moderate-income households. As the analysis above shows, at average densities, the City lacks sufficient land available and designated for multifamily development to provide for the needs of all income groups"

Comment: The city with its present 'Sphere of Influence' and open spaces can full the needs of all categories if the city would consider 'infill projects, building up to three stories, ADU's and building tiny homes that are affordable. Presently, the city planning commission as of 6/22/2025 approved two developments which could fit the needs of affordability and infill projects

CITY OF RIVERBANK
JUN 23 2025
DEVELOPMENT SERVICES
@ 1 PM

TABLE VI-~~13~~9
City's Ability to Meet Its Regional Housing Needs
City of Riverbank

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
HCD RHNA Allocation (June 2023 – Dec 2031)	485	485	672	594	1,355	3,591
Units Produced **(1)**					121	121
Net Allocation to be Met	485	485	672	594	1,234	3,470
Allocation to be Met	~~1,642~~485	485	672	594	1,234	3,470
Holding Capacity Within the City Limits						
	Very Low		**Low**	**Moderate**	**Above Moderate**	**Total**
Potential Units in Vacant Land	73		~~110~~50	~~25~~18	~~126~~73	~~261~~214
Potential Units in Underutilized Land	73		~~124~~47	~~10~~21	~~118~~23	~~252~~164
Potential Accessory Dwelling Units	0		~~23~~0	~~10~~40	~~9~~0	~~42~~40
Potential Units in Pipeline Projects	0		46	50	~~270~~105	~~366~~201
Potential Units in Downtown Specific Plan	140		~~585~~93	~~4~~7	0	~~586~~240
Potential Units in Crossroads West Specific Plan	188		~~318~~125	~~144~~515	~~1,415~~1,223	~~1,877~~2,057
Rezone Sites	506		339	0	0	845
City Holding Capacity Subtotal	***980***		***1,206700***	***240651***	***1,938~~1,424***	***3,384~~3,755***
Surplus (Shortfall)	***10***		***28***	***57***	***190***	***285***
Total Buffer (%)	***1%***		***4%***	***10%***	***15%***	***8%***

(1) Units with final building permits issued between January 2024 and June 30, 2024, as identified in Table VIII-1~~Holding Capacity Outside City Limits (2)~~

New version of the above table

Category	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
HCD RHNA Allocation (2023–2031)	485	485	672	594	1355	3591
Units Produced (1)					121	121
Net Allocation to be Met	485	485	672	594	1234	3470
Allocation to be Met	485	485	672	594	1234	3470

Holding Capacity

Capacity Source*	Very Low	% Very Low	Low	% Low	Moderate	%Moderate	Above Moderate	% Above Moderate	Total	
Potential Units in Vacant	73	34%	50	23%	18	8%	73	34%	214	100%
Potential Units in Underutilized	73	45%	47	29%	21	13%	23	14%	164	100%
Potential Accessory Dwelling	0	0%	0	0%	40	100%	0	0%	40	100%
Potential Units in Pipeline	0	0%	46	23%	50	25%	105	52%	201	100%
Potential Units in Downtown Specific Plan	140	58%	93	39%	7	3%	0	0%	240	100%
Potential Units in Crossroads West Specific Plan	188	9%	125	6%	515	25%	1223	60%	2051	100%
Rezone Sites	506	60%	339	40%	0	0%	0	0%	845	100%
City Holding Capacity Subtotal	980	26%	700	19%	651	17%	1424	38%	3755	100%
Surplus (Shortfall)	10		28		57		190		285	
Total Buffer (%)	1%		4%		10%		15%		8%	

Third,

Comment: Table VI- 13 is a mess… The table above, I created, reads clearer and demonstrates to me that city has housing capacity within its current 'sphere of influence'.

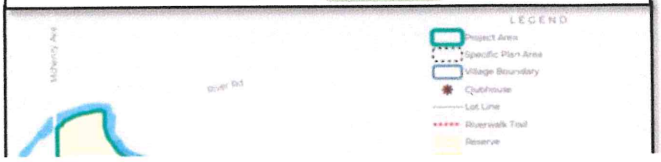
Fourth,

1. River Walk Specific Plan

~~The City is currently in the planning stages of processing t~~The proposed River Walk Specific Plan (RWSP), located in the unincorporated area of Stanislaus County and adjacent to the City of Riverbank, north of Patterson Road/State Route (SR) 108, east of McHenry Avenue, and approximately two miles northwest of downtown Riverbank.

The ~~River Walk Specific Plan~~ (RWSP) is a Mixed-Use development project that provides for a range of residential housing densities, neighborhood-scale retail, commercial and health/ medical services, private clubhouse, public recreation, a

MAP VI-2
Proposed Specific Plan Conceptual Land Use Diagram (Riverwalk)



Comment: As of this publication, there is a Public/City Council/ Planning meeting scheduled for July 9th 2025. I question the insert why the 'Proposed Riverwalk project' is being sited in this document. I recommend it be removed since there is a pending Ballot initiative that is to be voted in the fall of 2026. This initiative had over 1500 validated signatures.

Fifth,

"The RWSP is included in this Housing Element as reference only and is not proposed to

be counted towards the City's RHNA for the 6th Cycle Planning Period."

Comment: Why is the RWSP even included since this is not in the 'Sphere of Influence' for Riverbank

Overall

I, as a resident of Riverbank have spent numerous hours and effort in reviewing the housing elements report. Version 2 is a vast improvement from the first version which was very 'thin' on details. I appreciate the efforts of the contractor and city staff for working on getting the best options possible. On 6/16/2025 the city planning commission approved two housing projects which address the infill potential as well as tiny homes. These two projects are titled:

1. Sierra Village The proposed Project is an application for a Rezone, Vesting Tentative Subdivision Map, and Architecture & Site Plan Review for property at 6509 Claus Road (APN 132-048-016) located at the southwest corner of Claus Road and Stanislaus Street.

2. Meadowview Subdivision The proposed Project is an application for a Rezone, Vesting Tentative Subdivision Map, and Architecture & Site Plan Review at 4537 California Avenue (APN 062-021-007), located at the northwest corner of Snedigar Road and California Avenue. The application proposes to rezone the subject property from Single-Family Residential (R-1) to Planned Development (P-D) and a Vesting Tentative Subdivision Map to allow for the subdivision of the 5.83± acre parcel into thirty-one (31) single-family lots.

Finally, Recently the city turned down a tiny home project for various reasons. Primarily the wider community was opposed to having tiny homes in their neighborhoods out of fear of having high risk folks living in their area. I am not opposed to tiny homes as a means to have affordable housing in all areas of Riverbank. Thoughtful and public comment is an essential part of the process of getting to affordable housing… there were some considerations from tiny homes proposal that need to be funded and clarified.

Respectfully submitted

Garry Pearson

David Niskanen

From: Joshua Mann <jmann@riverbank.org> on behalf of Joshua Mann
Sent: Monday, June 23, 2025 3:59 PM
To: David Niskanen
Cc: Planning; Michael Arroyo
Subject: FW: Comments on the Second Draft Riverbank Housing Element: June 2025

Received another comment letter in addition to Mr. Pearson's letter. See email letter below.

Joshua E. Mann
City of Riverbank
Community Development Director

-----Original Message-----
From: JAMI AGGERS <aggersja@aol.com>
Sent: Monday, June 23, 2025 2:44 PM
To: Joshua Mann <jmann@riverbank.org>
Cc: HousingElements@hcd.ca.gov; Teams Teams <aggersja@aol.com>
Subject: Comments on the Second Draft Riverbank Housing Element: June 2025

Josh: Thank you for the opportunity to offer early comments on the referenced document. My comments are as follows:

1. The changes/revisions/additions that have been made to the Second Draft Housing Element are voluminous, and as such, conducting a thorough review of them was not possible in a limited, 7-day timeframe.
2. Page VI-18 of the document shows that the following language is proposed to be stricken: "The City is currently in the planning stages of processing the River Walk Specific Plan." On Page VI-23, however, the following language has not been stricken and it should be: "… the River Walk Specific Plan is currently being processed by City staff." This sentence is unnecessary, and for consistency, should be deleted.
3. Page VI-23 states the following: "Table VI-12…. Goes on to show the remaining capacity at average densities within the city limits in subdivisions and vacant land. Finally, unit potential outside the city limits, but within the SOI is shown." I do not see remaining capacity or unit potential listed in Table VI-12. Is this an oversight or is this information shown in a different Table?
4. Page VI-23 also states the following: "…the City of Riverbank does not have enough land to accommodate its total RHNA for very-low and low income" categories, yet Table VI-13 (Page VI-24) shows a surplus of housing units in all categories, thus meeting the RHNA numbers. Which is correct?
5. Page IX-20/21 says the City will partner (only) with "local churches" yet on Page X-24 the language "and local interest groups" was added to supplement partnering with "local churches." For consistency, "and local interest groups" should also be added on Page IX-20/21.
6. On September 10, 2024, the Riverbank City Council approved Item No. 11.3 on their agenda titled "Acceptance of Certificate of Initiative Petition Entitled 'Voter Approval Required to Allow Development of Urban Uses on Agricultural or Open Space Lands Located West of Riverbank City Limits,' and Submitting the Initiative to the Voters at a Future Regular Election." Given that this Initiative has qualified for and will be placed on the November 2026 General Election, it should be listed in the Housing Element in the following section: Section VII Housing Production Constraints, and specifically under VII-23: Land Use Constraints, because it is an existing potential constraint and if passed, it will be a constraint. Since the River Walk project has been included "for reference only," the Urban Limit Initiative should also be included "for reference only." Excluding it from the Housing Element does not present the entire picture.

I will likely have additional comments, but given the limited time that was allowed for review, I will have to provide them to the City and to HCD at a later date, but before the Housing Element is adopted.

Thank you, Jami Aggers

Sent from my iPad

David Niskanen

From: Joshua Mann <jmann@riverbank.org> on behalf of Joshua Mann
Sent: Tuesday, June 24, 2025 7:34 AM
To: David Niskanen
Cc: Michael Arroyo; Planning
Subject: FW: Comments on the Second Draft Riverbank Housing Element: June 2025

2nd comment provided by Mrs. Aggers

Joshua E. Mann
City of Riverbank
Community Development Director

-----Original Message-----
From: JAMI AGGERS <aggersja@aol.com>
Sent: Tuesday, June 24, 2025 5:59 AM
To: Joshua Mann <jmann@riverbank.org>
Cc: HousingElements@hcd.ca.gov; Teams Teams <aggersja@aol.com>
Subject: Re: Comments on the Second Draft Riverbank Housing Element: June 2025

Good Morning, Josh.
Thank you for being willing to accept comments so long as they are received by 8 a.m. this morning. I would like to add just one final comment…

—While reviewing the 2nd Draft, the viewer can easily see the new information that has been added, but while some of the text that is proposed to be removed is "visible" because it is shown in strikeout (such as the changes on Page VI-18 re: River Walk), other information has been removed from the Draft that is NOT shown in strikeout; in other words, it is now simply just gone. For example: in my previous comment letter dated Nov. 3, 2024, Comment #6 pointed out that Table II-2 seemed to show an inflated population projection for the year 2025 (which was only 2 months from the date of my letter). I'm guessing that the response to my comment was to remove the 2025 population from Table II-2 because it is now missing, yet the 2025 population that the Table previously included (28,223 people) is NOT visible with strikeout text as it should be. Another possible example is Table VI-13 which shows the "new" RHNA excess/shortfall total numbers, but does NOT show what the excess/shortfall numbers were in the 1st Draft; rather, it only shows the "new" excesses. This is concerning because there may be other text that is proposed to be deleted that is now "missing" from the document rather than being shown in strikeout text. If that is the case, how would the viewer easily recognize the proposed deletion…..? Is it possible to restore text in the 2nd Draft in strikeout that is proposed to be deleted so that it is visible to the reviewer?

Thank you in advance for your consideration, Jami Aggers

Sent from my iPad

> On Jun 23, 2025, at 4:21 PM, Joshua Mann <jmann@riverbank.org> wrote:
>
> You are welcome.
>

> Oh one other thing I forgot to mention is that I understand the review period is short, we are all busy and the document is a drag to read but any comments received after tomorrow morning will not be able to be incorporated into the draft we send back to HCD.
>
> Joshua E. Mann
> City of Riverbank
> Community Development Director
>
>
>
> -----Original Message-----
> From: JAMI AGGERS <aggersja@aol.com>
> Sent: Monday, June 23, 2025 4:14 PM
> To: Joshua Mann <jmann@riverbank.org>
> Subject: Re: Comments on the Second Draft Riverbank Housing Element: June 2025
>
> Thank you, Josh
>
> Sent from my iPad
>
>> On Jun 23, 2025, at 3:56 PM, Joshua Mann <jmann@riverbank.org> wrote:
>>
>> Received. Thank you I will add this to our comment list.
>>
>> Joshua E. Mann
>> City of Riverbank
>> Community Development Director
>>
>>
>>
>> -----Original Message-----
>> From: JAMI AGGERS <aggersja@aol.com>
>> Sent: Monday, June 23, 2025 2:44 PM
>> To: Joshua Mann <jmann@riverbank.org>
>> Cc: HousingElements@hcd.ca.gov; Teams Teams <aggersja@aol.com>
>> Subject: Comments on the Second Draft Riverbank Housing Element: June 2025
>>
>> Josh: Thank you for the opportunity to offer early comments on the referenced document. My comments are as follows:
>>
>> 1. The changes/revisions/additions that have been made to the Second Draft Housing Element are voluminous, and as such, conducting a thorough review of them was not possible in a limited, 7-day timeframe.
>> 2. Page VI-18 of the document shows that the following language is proposed to be stricken: “The City is currently in the planning stages of processing the River Walk Specific Plan.” On Page VI-23, however, the following language has not been stricken and it should be: “… the River Walk Specific Plan is currently being processed by City staff.” This sentence is unnecessary, and for consistency, should be deleted.
>> 3. Page VI-23 states the following: “Table VI-12…. Goes on to show the remaining capacity at average densities within the city limits in subdivisions and vacant land. Finally, unit potential outside the city limits, but within the SOI is shown.” I do not see remaining capacity or unit potential listed in Table VI-12. Is this an oversight or is this information shown in a different Table?

>> 4. Page VI-23 also states the following: "…the City of Riverbank does not have enough land to accommodate its total RHNA for very-low and low income" categories, yet Table VI-13 (Page VI-24) shows a surplus of housing units in all categories, thus meeting the RHNA numbers. Which is correct?
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>> 6. On September 10, 2024, the Riverbank City Council approved Item No. 11.3 on their agenda titled "Acceptance of Certificate of Initiative Petition Entitled 'Voter Approval Required to Allow Development of Urban Uses on Agricultural or Open Space Lands Located West of Riverbank City Limits,' and Submitting the Initiative to the Voters at a Future Regular Election." Given that this Initiative has qualified for and will be placed on the November 2026 General Election, it should be listed in the Housing Element in the following section: Section VII Housing Production Constraints, and specifically under VII-23: Land Use Constraints, because it is an existing potential constraint and if passed, it will be a constraint. Since the River Walk project has been included "for reference only," the Urban Limit Initiative should also be included "for reference only." Excluding it from the Housing Element does not present the entire picture.
>>
>> I will likely have additional comments, but given the limited time that was allowed for review, I will have to provide them to the City and to HCD at a later date, but before the Housing Element is adopted.
>>
>> Thank you, Jami Aggers
>>
>> Sent from my iPad
>

David Niskanen

From: Joshua Mann <jmann@riverbank.org> on behalf of Joshua Mann
Sent: Tuesday, June 24, 2025 2:36 PM
To: David Niskanen
Cc: Planning; Michael Arroyo
Subject: FW: Comments on the Second Draft Riverbank Housing Element, June 2025

From: Karen Conrotto <kconrotto@gmail.com>
Sent: Monday, June 23, 2025 11:54 PM
To: Joshua Mann <jmann@riverbank.org>
Cc: Housing Elenents <HousingElements@hcd.ca.gov>; Karen Gerber Conrotto <kconrotto@gmail.com>
Subject: Comments on the Second Draft Riverbank Housing Element, June 2025

You don't often get email from kconrotto@gmail.com. Learn why this is important

Comments for the 2nd Housing and Community Draft (HCD), June 2025. Review Draft, 6th Cycle Housing Element .

Mr. Mann,

Thank you for this opportunity to comment on the Housing Element document. My comments include:

1. Seven days to respond to the many changes made to the 2nd Draft Housing Element are not adequate to thoroughly review and provide feedback to the City of Riverbank for this document.
2. I did not find a revision based on a decreased rate of population growth for the City of Riverbank.
3. Although the following written language was proposed to be dropped, “the City is currently in the planning stage of processing the River Walk Specific Plan”, later in the document, a subsequent sentence reads, “…the River Walk Specific Plan is currently being processed by City Staff.” This appears to be conflicting information and planning.
4. Again, conflicting information is presented: Page VI-23 states, “…the City of Riverbank does not have enough land to accommodate it’s total RHNA for very-low and low income” categories, yet Tables VI-13 on page V-24, indicate a surplus of housing units in all categories, meeting RHNA numbers.
5. Also on page VI-23, it is noted that: the Table shows “the remaining capacity at average densities within the city limits, in subdivisions and vacant land”. Also, “unit potential outside the city limits, but within the SOI is shown.” I did not see “remaining capacity” or “”unit potential” listed in the indicated Table.
6. Page 1-5: On September 11, 2024, stakeholders (including Residential Developers and Housing Service Providers) were invited to participate in a meeting to discuss housing issues in the City of Riverbank. Developers expressed many concerns, some of which included amending development standards, that would accommodate a reduced street width, a reduction in community open space, smaller lot sizes, allowing duets/duplex units. They requested increased flexibility with density ranges. They requested minimizing required land use entitlements and allow development by right, among other recommendations. All of these recommended changes, appeared to reduce the quality of life for the residents who would be living there, while putting more money into the pockets of the developers (more houses per acre, in effect). Smaller homes with narrower streets and smaller community open spaces, once built, would be there for decades, not only affecting the quality of life for the initial buyers/residents, but for generations of families and the surrounding community. Another conflict that could be included here, would be as noted on page IV-23”…large families should also have adequate recreational areas for children and adults near their residences.” I feel strongly that these recommendations should not be followed because the homeowner and their family would be the ones to suffer the consequences of the increased housing density, with all that that would entail.
7. On page VI-9 it is noted that the City is in receipt of an in-fill, mixed-use, development project consisting of …144 multi-family residential units, while this application has been received and processed, these units have not been included in the City’s ability to meet the Regional Housing Needs Allocation, rather this application illustrates the unique opportunities to provide housing opportunities within the Crossroads Specific Pan. My question is why weren’t these units included in the City’s ability to meet the Regional Housing Needs Allocation?
8. On page VI-9 It states the Downtown Specific Plan (DTSP) is identified as an infill Opportunity Area, in which the City will focus on reinvestment and revitalization efforts. Although mention of vertical building occurred elsewhere within this document, I did not read any consideration of building higher than a four story building, nor discussion of purchasing a fire truck capable of reaching/rescuing higher than four stories. Building higher vertically, would appear to significantly increase the ability to house more residents and businesses, thus avoiding urban sprawl, leap frogging and encroaching into areas of agricultural land, also keeping activity more central to downtown areas, and increasing the ability to meet RHNA requirements and would address the comment, (page VI-23) “…the City lacks sufficient land available and designated for multi-family development to provide for the needs of all income groups.” I would hope this area would be addressed.
9. On page VI-19, it is stated that: The River Walk Specific Plan (RWSP) is included in this Housing Element as reference only and is not proposed to be counted towards the City’s RHNA for the 6th Cycle Planning Period. In this document, there is no mention of the City of Riverbank’s residents that appear to oppose this project as indicated by the gathering of signatures that ensured an Urban Limits

Initiative would be placed on the ballot. The City of Riverbank City Council approved the agenda item stating, “Acceptance of Certificate of Initiative Petition Entitled ‘Voter Approval Required to Allow Development of Urban Uses on Agricultural or Open Space Lands Located West of Riverbank City Limits,’ and submitting the Initiative to the Voters at a Future Regular Election.” This Initiative has qualified for and will be placed on the November 2026 General Election ballot. Excluding this information from the Housing Element does not present a full disclosure, in my opinion. I think it should be noted in the Section VII Housing Production Constraints, specifically under Land Use Constraints, because the potential for passage, will ensure it is a constraint. If the RWSP is included as a “reference only”, then I believe the “Urban Limits Initiative” should be included as well.

10. There are other conflicts and inconsistencies that are within this Housing Element document; however, they will need to be addressed at a later date, as there was insufficient notice and time to address all the issues.

Thank you for this opportunity.

Sincerely,

Karen Conrotto

APPENDIX M
HCD COMMENT LETTERS

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
651 Bannon Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

February 27, 2025

Joshua E. Mann, Director
Community Development Department
City of Riverbank
6707 3rd Street
Riverbank, CA 95367

Dear Joshua E. Mann:

RE: City of Riverbank's 6th Cycle (2023-2031) Draft Housing Element

Thank you for submitting the City of Riverbank's (City) draft housing element received for review on December 2, 2025. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation with you and your consultant on January 30, 2025. In addition, HCD considered comments from Marty Adrian, Jami Aggers, Gretchen Brown, Christa Casci, Karen Conrotto, Annabel Gammon and J. Allen Gammon, Evelyn Halbert, Diana Hernandez-Adrian, Christine Holmer, Libby Longstreth, Vivian Lopez, Arlene Nagle, Garry Pearson, Betsy Walton, and Voters for Farmland pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due December 31, 2023. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described, adopt, and submit to HCD to regain housing element compliance.

Pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), a jurisdiction that did not adopt a compliant housing element within one year from the statutory deadline cannot be found in compliance until rezones are completed to make prior identified sites available or to accommodate a shortfall of sites pursuant to Government Code sections 65583, subdivision (c)(1)(A) and section 65583.2, subdivision (c). As this year has

passed and Program 1.1a has not been completed, the housing element is out of compliance and will remain out of compliance until the rezoning has been completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the efforts of the housing element update team during the update and review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Emily Hovda, of our staff, at Emily.Hovda@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF RIVERBANK

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at https://www.hcd.ca.gov/planning-and-community-development/hcd-memos. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The element must provide an evaluation of the cumulative effectiveness of goals, policies, and related actions in meeting the housing needs of special-needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness). Programs should be revised as appropriate to reflect the results of this evaluation.

Additionally, to demonstrate adequate sites from the prior planning period, the prior element included Program 1.1c to rezone sites to accommodate the regional housing needs allocation (RHNA) for lower-income households. The element should demonstrate that the sites were rezoned to meet by-right requirements pursuant to Government Code 65583.2(h) and (i), including but not limited to permitting multifamily development without discretionary action and requiring minimum densities.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

The element generally describes some of the requirements regarding an analysis of Affirmatively Furthering Fair Housing (AFFH); however, it then describes the analysis is pending and generally does not address this requirement. For your information, subsequent submittals of the housing element must address the AFFH requirements. For example, the element, among other things, must include an assessment of fair housing, including discussion of patterns of integration and segregation, Racially and Ethnically Concentrated Areas of Poverty and Affluence, (RECAP and RCAA) disparities in access to opportunity, disproportionate housing needs, analysis of fair housing issues in relation to identified sites and identification and prioritization of contributing factors to fair housing issues. This analysis must be supplemented by local data and knowledge and other relevant factors and based on the outcomes of a complete analysis, goals and actions must be added to the element and should be sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. HCD will send sample analyses to assist the City in meeting this requirement. For further guidance, please visit HCD's AFFH in California webpage at https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

   Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)

   Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)

   Population, Employment, and Household Characteristics: The element does not address this requirement. The element must include a description and analysis of current population trends and employment data, including an identification of significant employers, industries, and typical wages. In addition, it must also include an analysis of household characteristics, such as tenure (rental or homeownership), growth rate, and trends. For additional information, please see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/population-employment-and-household-characteristics.

   Housing Costs: While the element includes information on rental and sales prices, rental information from the American Community Survey (ACS) does not fully reflect market conditions and the element should include current local data from additional data sources.

Extremely Low-Income (ELI) Households: While the element includes some information about ELI households, given the unique and disproportionate needs of ELI households, the element should expand the analysis to include coincidences with other special housing needs, disproportionate housing needs (i.e., cost burden, overcrowding compared to other income groups), impacts on related issues such as transportation opportunities and health outcomes, then examine the availability of resources to determine gaps in housing needs.

Additionally, the element must also identify projected housing needs. The projected housing need for ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of the RHNA for very low-income households qualify as ELI households. For additional information, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/extremely-low-income-housing-needs.

Persons with Disabilities: While the element quantifies persons with disabilities, including developmental disabilities, in the City, it should also discuss and analyze the availability of resources and the magnitude and nature of the gap between resources and housing needs. Additionally, the element should discuss the unique housing needs and challenges experienced by persons with developmental disabilities. For additional information, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/people-disabilities-including-developmental-disabilities.

Farmworkers: While the element quantifies farmworkers in the City, the analysis should be expanded to include discussion of characteristics of this group (e.g., permanent, seasonal, housing tenure, disproportionate housing needs) and the magnitude and nature of the gap between resources and housing needs and characteristics. For additional information on the disproportionate needs of farmworkers, see Farmworker Health in California: Health in a Time of Contagion, Drought, and Climate Change from the University of California, Merced at https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf.

Seniors: While the element quantifies seniors in the City, it should also analyze senior households by tenure, and discuss and analyze the availability of resources and the magnitude and nature of the gap between resources and housing needs.

Large and Female-Headed Households: While the element quantifies large households and female-headed households in the City, it should also discuss and analyze the availability of resources and the magnitude and nature of the gap between resources and housing needs.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and*

an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)

Progress in Meeting the RHNA: While Table VI-9 (p. VI-17) quantifies the number of units expected to be accommodated both within and outside City limits, the number of lower-income units should be divided between low- and very low-income categories.

Additionally, the element identifies 366 units that are either pending, approved, or under construction. If utilizing pending development toward the RHNA, the element must demonstrate the affordability and availability of these units during the planning period. Affordability should be demonstrated based on actual or anticipated rents or sales prices or other mechanisms ensuring affordability (e.g., deed restrictions). To demonstrate the availability of units within the planning period, the element could analyze infrastructure schedules, the City's past completion rates on pipeline projects, outreach with developers, and should describe any expiration dates on entitlements, anticipated timelines for final approvals, and any remaining steps for projects to receive final entitlements. The element must also include a program to monitor the development of the pipeline projects and identify alternative actions, such as rezoning or identification of additional sites, should the projects not make sufficient progress within the planning period.

Parcel Listing: While the element includes a parcel listing of identified sites, it should separate the moderate- and above moderate-income categories by site or by number of units.

Candidate Sites to Accommodate a Shortfall of Capacity: The element identifies a shortfall of adequate sites to accommodate a total of 790 lower- and moderate-income units and further identifies 15 candidate sites to be rezoned to accommodate this shortfall. The identification of candidate sites must address all components specified in Section 65583.2, including listing of sites by existing and proposed general plan designation and zoning, existing uses and anticipated affordability levels. The element must also demonstrate their suitability and availability in the planning period, including but not limited to calculation of realistic capacity, availability of infrastructure, appropriate size and density, mapping and any known constraints or conditions that could preclude development in the planning period.

Realistic Capacity: While the element provides realistic capacity estimates, it must also include analysis support these capacity assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. For example, the element could list recent projects by number of units, zone, allowable densities, built densities and affordability. The analysis may utilize recent development trends in the City and broader region.

In addition, the element appears to assume residential development on sites with zoning that allow nonresidential uses. As such, the element should include realistic capacity calculations for sites in nonresidential zones and account for the likelihood of nonresidential uses. The element should include analysis based on factors such as development trends, performance standards or other relevant factors. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly. For additional information, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/analysis-sites-and-zoning.

Small and Large Sites: Sites smaller than half an acre or greater than ten acres are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that sites of equivalent size with affordability were successfully developed during the prior planning period or other evidence demonstrates the suitability of these sites. The element should provide analysis of past trends or present other evidence to demonstrate the suitability of these sites. For example, for small sites, the analysis could describe the City's role or track record in facilitating past lot consolidation, common ownership, policies, or incentives offered or proposed to encourage and facilitate lot consolidation or other conditions rendering parcels suitable and ready-for-lot consolidation. For large sites, the element could discuss past developments, including developments in the broader region and how appropriate parceling or other measures were taken to facilitate affordability to lower-income households.

Zoning for Lower-Income Households: The element must demonstrate densities appropriate to accommodate housing for lower-income households. For communities with densities that meet specific standards (at least 20 units per acre for Riverbank), no analysis is required (Government Code section 655832.2(c)(3)). Otherwise, an analysis must demonstrate appropriate densities based on factors such as market demand, financial feasibility, and development experience within identified zones. The element identifies several sites designated Mixed Use (MU) with an allowable density of 18 units per acre. As a result, the element should either demonstrate the appropriateness of this zone through analysis, remove or shift the sites toward other income groups or revise the allowable density to 20 or more units per acre.

Environmental Constraints: While the element discusses environmental constraints in relation to nonvacant sites, it should also discuss and analyze environmental constraints in relation to vacant sites, which should include analysis of any other known environmental or other constraints (e.g., shape, access, easements, conservation easements, Williamson Act contracts, military and other compatibility, contamination) that could impact housing development on identified sites in the planning period.

Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within the timeframe specified in Government Code section 65583.2(c). The element should clarify if sites were identified in prior planning periods and if so, which sites and add or modify a program pursuant to Government Code section 65583.2(c). For more information on program requirements, please see HCD's Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. The analysis may utilize representative sites to address this requirement and should consider factors such as degree of underutilization, past experiences converting existing uses to higher density residential development, current demand for the existing use, any existing leases or other conditions precluding redevelopment, condition of the existing structure, vacancies, recent turnover, recent improvements and developer or property owner interest.

Replacement Requirements: For your information, if the element identifies sites with existing residential uses meeting specified criteria, absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).

Annexation: If the element relies on sites that need to be annexed to accommodate the regional housing need, it must demonstrate their suitability and availability in the planning period. For example, the element should discuss the status of the annexation; remaining steps necessary to complete the annexation; anticipated timeframe for each step; and any barriers to annexation. Upon a complete analysis, the element should add or modify programs as necessary to facilitate the annexation; including phasing multifamily zoned sites earlier in the planning period; establishing appropriate zoning including meeting by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) and to rezone other sites if the annexation is not completed by a specified date.

Accessory Dwelling Units (ADU): The element projects 42 ADUs or approximately 5 ADUs per year over the eight-year planning period. However, this projection is inconsistent with HCD's records (1 ADU permitted in 2021, 1 permitted in 2022, and 5 permitted in 2023) and the element should reconcile trends between the City and HCD. Additionally, the element must demonstrate the anticipated affordability of ADUs based on actual or anticipated rents. For example, the element may utilize a rent survey or other information from Stanislaus County that examines rents and ADU affordability in the region.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at https://www.hcd.ca.gov/planning-and-community-development/housing-elements for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element indicates emergency shelters are permitted by-right in the R-3 zone (p. IV-20); however, it should clarify whether emergency shelters are permitted *without discretionary approval* and if necessary, add or modify programs. Further, the element indicates emergency shelters are allowed with a conditional use permit in the C-1, C-2, and CM zones. The element should describe the development standards of these zones, including any special standards for emergency shelters and whether those standards are appropriate for emergency shelters, especially relating to parking. Specifically, the element must evaluate the City's emergency shelter parking requirements pursuant to AB 139/Government Code section 65583, subdivision (a)(4)(A) or include a program to comply with this requirement. The element should also provide an analysis of capacity, including acreage, parcel size, vacancy status, and proximity to transportation and services for potential sites, hazardous conditions, and any conditions inappropriate for human habitability. Finally, the element should discuss the City's definition of emergency shelters and whether it is consistent with AB 2339 and add or modify programs, if necessary.

- *Housing for Farmworkers:* The element indicates farmworker housing is allowed by-right in the R-1 zone (p. D-2). However, the element should address whether the City complies with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5, 17021.6 and 17021.8. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. Section 17021.8 requires that a development is subject to a streamlined, ministerial approval process and is not subject to a conditional use permit (CUP) if the development is an eligible agricultural employee housing development. Based on a complete analysis, the element should add or modify programs, if necessary.

- *Low-Barrier Navigation Centers:* Low-barrier navigation centers shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660. The element must demonstrate compliance with this requirement and add or modify programs as appropriate.

- *Permanent Supportive Housing:* Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and add or modify programs, if necessary.

- *Mobilehomes and Manufactured Housing:* Manufactured homes that are built on a permanent foundation must be allowed in the same manner and in the same zones as conventional or stick-built structures. Specifically, manufactured homes on a permanent structure should only be subject to the same development standards as a conventional single-family residential dwelling. The element must demonstrate compliance with this requirement and add or modify programs as appropriate.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

   Land Use Controls: The element indicates that all multifamily housing developments must include fenced open space of at least 50 square feet per unit with a minimum area of 300 square feet (p. D-5). The element should further describe and analyze this requirement as a potential constrain on multifamily housing development. Based on a complete analysis, the element should add or modify programs as appropriate.

   Additionally, the Crossroads Specific Plan requires a floor-area-ratio of 0.35, which the element should discuss and analyze as a potential constraint on the ability to achieve maximum densities.

   Parking: Program 3.1d of the previous housing element was intended to lower parking requirements for multifamily housing developments and is noted as being complete (p. IX-13); however, it is unclear whether these standards were amended, as Table D-2 and the parking requirements described on page D-6 contradict the new requirements established by Program 3.1d. The element should reconcile this information and add or modify programs to reduce parking requirements, if necessary.

   Additionally, the element should analyze parking requirements for mobile homes as a potential constraint and add or modify programs as appropriate.

   Density Limits: The element indicates in Table D-2 that the R-3 zone has a minimum density of 20 units per acre; however, elsewhere in the element, the R-3 zone is listed as having a minimum density of 16 units per acre (p. VI-10). The element should reconcile this information.

Additionally, the element should address comments from developers relating to density (p. I-6) and include discussion of how they were incorporated in the element. HCD encourages the City to incorporate these comments in the element's schedule of programs.

Zoning and Fees Transparency: The element should clarify compliance with transparency requirements for posting all fees, zoning, and development standards on the City's website and add a program to address these requirements, if necessary.

Local Processing and Permit Procedures: While the element includes information on the City's processing and permitting procedures, it should also analyze these procedures as a potential constraint on housing development. In particular, the element should list and analyze approval findings for impacts on approval certainty and the maximum three meetings per year to process General Plan and zoning modifications.

Additionally, the element must clarify whether there are written procedures for the SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and, if there are no written procedures, add a program to address these requirements.

Finally, the element should address public comments on this draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.

Housing for Persons with Disabilities: The element must analyze potential constraints on housing for persons with disabilities, as follows:

- *Reasonable Accommodation:* The element briefly mentions the City's reasonable accommodation procedures; however, the element should also describe these procedures, decision-making criteria, application requirements, approval findings, fees, and analyze any potential constraints on housing for persons with disabilities. Based on a complete analysis, the element should add or modify programs as appropriate.

- *Group Homes:* While the element indicates group homes of seven or more persons are conditionally permitted in the Multiple Family Residential Zone (p. VII-9), it should also analyze exclusion of these group homes from other zones allowing residential uses as a constraint on housing for persons with disabilities. In addition, the element should address the CUP requirement as a constraint, including listing and analyzing approval findings for impacts on approval certainty. The element should also clarify whether development standards for group homes are the same as development standards for similar uses in the same underlying zone. Based on a complete analysis, the element should add or modify programs as appropriate.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability*

of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)

Availability of Financing: The element should describe whether housing financing, including private financing and government assistance programs, are generally available in the City.

Approval Time and Requests for Lesser Densities: The element must analyze requests to develop housing at densities below those assumed in the sites inventory. The element should also identify the typical length of time between receiving approval for housing development and submittal of applications for building permits. The analysis should address any hinderances on achieving the RHNA.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element… (Gov. Code, § 65583, subd. (c).)*

   To have a beneficial impact in the planning period and achieve the goals and objectives of the housing element, Programs must include discrete timing (e.g., at least annually, by 2026). Examples of programs that should be revised include Programs 3.1a (Planned Development and Tiny Homes), 4.1a (Rehabilitation Funding), and 4.1c (Housing Condition Survey).

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583, subd. (c)(1).)*

As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- *Program 1.1a*: While the element includes this Program to rezone necessary to accommodate the City's shortfall of adequate sites, it must specifically commit to acreage, zone, allowable densities, and anticipated units.
- *Program 1.1c*: A cursory review of the City's ADU ordinance by HCD discovered areas which appear to be inconsistent with State ADU Law. As a result, the Program should commit to updating the City's ADU ordinance to comply with state law with discrete timing (e.g., six months).
- *Program 2.1k*: The Program should commit the City to establishing appropriate development standards for single-room occupancy units (SROs).
- *Housing for Farmworkers*: Based on the outcomes of a complete analysis, the element should add or modify programs to adhere to requirements described in Health and Safety Code 17021.5, 17021.6, and 17021.8.
- *Infrastructure*: The element identifies the need for the City's wastewater treatment plant to be upgraded and expanded in order to accommodate the City's RHNA. As such, the element should commit to a schedule of actions to complete the appropriate infrastructure improvements.

3. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

   Special Housing Needs: The element must include specific actions to assist in the development of housing for ELI and special needs households. In addition, the element must include specific actions to address the needs of farmworkers. For farmworkers, specific efforts should be included based on the outcomes of a complete analysis. For example, the element could commit to proactive actions to coordinate with nonprofit developers, employers, and other related organizations, to explore funding and incentives, annually identify specific development opportunities, pursuing strategies to integrate affordable housing and targeting rehabilitation and conservation and improvement programs toward farmworkers.

   Density Bonus Ordinance: The element should add or modify programs to amend the City's density bonus ordinance to comply with state law.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in relatively higher income and opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the City made efforts to include the public through workshops and surveys, moving forward, the City should employ additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. For additional information, see the Building Blocks at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/public-participation.