

CITY OF ESCALON

Housing Element Update

SIXTH HOUSING ELEMENT CYCLE

2023-2031

HCD Review Draft
December 2023

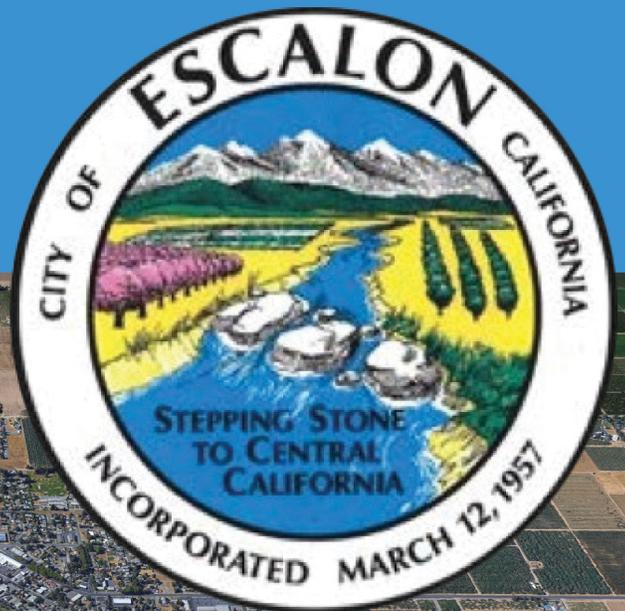


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SECTION 1: INTRODUCTION & SUMMARY

1.1 Introduction

This section within the Escalon General Plan, the Housing Element, is dedicated to presenting the goals, policies, actions, and needs pertaining to the provision of housing for the current and future residents of the City of Escalon. The Housing Element serves a dual function: firstly, it outlines specific policies and actionable measures designed to meet Escalon's unique and clearly identified housing needs; and secondly, it aims to align with regional standards and attain State certification, as required by State law.

1.2 Definition and Purpose

A housing element is a crucial component of a local jurisdiction's comprehensive plan, also known as a General Plan. A housing element must identify and assess existing and projected housing needs, existing policies and programs, and constraints to housing development. It must also establish goals, policies, quantified objectives, financial resources, and scheduled programs to meet housing needs.

State law requires that Housing Elements be revised periodically. This document updates the 2019-2023 Escalon Housing Element and covers the period from December 31, 2023, to December 31, 2031. The purpose of a housing element is to adequately address local housing needs in a way that does not constrain development, by facilitating the development of diverse housing options and promoting fair housing practices.

1.3 Consistency with State Laws and General Plan

Under California law, local jurisdictions are required to update their housing elements on a set schedule to align with changing demographics, economic conditions, and regional housing goals. The components of a housing element are set by the California "Housing Element law" (Government Code § 65580 - 65589.11). State law requires the various sections, or elements, of a General Plan to be consistent with one another. Upon adoption, this Housing Element becomes a part of the Escalon General Plan and is found to be consistent with the rest of the General Plan. As the General Plan is amended in the future, the City will ensure the Housing Element remains consistent.

New State law requires that the Safety Element be updated to address climate adaptation upon revision of the Housing Element. The City will ensure compliance with this requirement.

Pursuant to Government Code § 65589.7, the City will provide a copy of the adopted Housing Element to local water and sewer providers, and those entities must apply priority service to proposed affordable housing developments for lower income households.

1.4 Public Participation

Effective housing policy must reflect the values and priorities of the community. The public participation requirement of Housing Element law presents an opportunity to engage

residents in defining housing issues, and in creating solutions that both meet the needs of the community and the requirements of State law. It is the cornerstone of the process.

For the development of the 2023-2031 Escalon Housing Element, methods of obtaining public participation and input included, but were not limited to the following:

- Housing Needs and Opportunities Community Opinion Survey (English and Spanish)
- Informational flyer and survey mailed to all utility customers
- Updates provided via email to the Escalon Housing Element Update interest list
- Joint City Council and Planning Commission Housing Element Kickoff Workshop of October 2, 2023 (hybrid format)
- Joint City Council and Planning Commission Draft Housing Strategy Workshop of November 6, 2023 (hybrid format)
- Public Review Draft Workshop in Fall 2023 (virtual format)
- Stakeholder survey sent to 75+ housing development professionals to assess housing constraints
- Stakeholder survey sent to local and regional service providers to assess constraints and fair housing contributing factors
- Housing Element updates posted on the City of Escalon website

1.5 Organization of the Housing Element

The Escalon Housing Element is comprised of the following five major components:

- **Section 1** introduces the overall Housing Element update effort, a summary of housing needs and constraints, a Fair Housing summary, and a review of the effectiveness of the 2019 Housing Element and the City's progress in its implementation.
- **Section 2** sets forth the City's Housing Strategy, which is comprised of the Goals, Policies, and Programs that it intends to implement over the next 8-year planning cycle. The City's Quantified Objectives are also included in Section 2.
- **Section 3** presents a detailed Housing Sites Inventory, including a discussion of the availability of services, and compares this Inventory to the City's projected housing needs.
- **Section 4**, the Technical Background Report, provides statutorily required data including an assessment of housing needs and programs, an analysis of non-governmental and governmental constraints to affordable housing provision, and a discussion of special needs populations.
- **Section 5**, the Fair Housing Assessment, is a new requirement for housing elements to identify factors that contribute to local fair housing issues and barriers and include meaningful actions within the City's Housing Element Goals, Policies, and Programs to address those factors.
- **Appendices** provide background context on sites, community engagement, and program implementation.

1.6 Definition of Terms

Throughout the Housing Element, a variety of technical terms related to income levels are used in describing and quantifying conditions and objectives. The definitions of these terms follow:

- **Above Moderate-Income Households:** Households earning over 120% of the County's Area Median Income (AMI), adjusted for household size.
- **Acutely Low-Income:** Households earning not more than 15% of the County AMI, adjusted for household size.
- **Affordable Housing:** Housing that costs no more than 30 percent of a moderate-, low-, very low-, or extremely low-income household's gross monthly income. For affordable rental units, monthly rent is capped at 30 percent of the relevant Area Median Income (AMI), divided by 12, with any tenant-paid utilities deducted. For homeownership units, the maximum sales price is calculated assuming no more than 30 percent of the relevant AMI household's monthly income will be spent on the monthly housing payment, which includes mortgage payments, taxes, insurance, and homeowners' dues.
- **Area Median Income (AMI):** The income figure representing the middle point of the County household income. Fifty percent of households earn more than or equal to this figure and 50% earn less than or equal to this figure. The AMI varies according to the size of the household. For the year 2023, the AMI for a four-person household in County of Monterey was \$100,400.
- **Cost Burden:** The condition of a household spending more than 30% of their income on rent, mortgage, utilities, and other housing needs.
- **Extremely Low-Income Households (ELI):** Households earning not more than 30% of the County AMI, adjusted for household size.
- **Federal Poverty Threshold:** Issued by the Census Bureau and varies by family size, number of children, elderly. There is no geographic variation. For 2022, the poverty threshold for a family of four was \$29,950, and for a family of two, it was \$18,900. (Note: this differs from the Federal Poverty Guidelines issued by Health & Human Services)
- **Low-Barrier Navigation Center:** a "Housing First," low barrier, temporary, service-enriched shelter that helps homeless individuals and families to quickly obtain permanent housing.
- **Low-Income Households:** Households earning between 51-80% of the County AMI, adjusted for household size.
- **Missing Middle Housing:** A range of house-scale buildings with multiple units compatible in scale and form with detached single-family homes. (Source: <https://missingmiddlehousing.com/>)
- **Moderate-Income Households:** Households earning 81 to 120 percent of the County AMI, adjusted for household size.

- **Plexes:** Typically, a single structure that contains more than one dwelling unit. The units share common walls, and each typically has an outside entrance. Examples include duplex, triplex, quadruplex, etc.
- **SJCOG:** San Joaquin Council of Governments (SJCOG) is a joint powers authority comprised of the County of San Joaquin and the cities of Stockton, Lodi, Manteca, Tracy, Ripon, Escalon, and Lathrop. SJCOG fosters intergovernmental coordination within San Joaquin County, neighboring jurisdictions, and other regional agencies, the state of California, and Federal agencies. It is governed by a Board of Directors comprised of City and County elected officials within the region, and representatives from Caltrans, the San Joaquin Regional Transit District, and the Port of Stockton. SJCOG serves as the federally designated Metropolitan Planning Organization (MPO), Regional Transportation Planning Agency (RTPA), and Local Transportation Sales Tax Authority for San Joaquin County.
- **Special Needs Populations:** Special needs population groups include seniors, extremely low-income, female-headed households, persons with disabilities, farmworkers, and individuals experiencing homelessness. Special needs groups may have additional housing needs that require specific program responses to increase access to and availability of suitable housing options.
- **Very Low-Income Households (VLI):** Households earning between 31-50% of the County AMI, adjusted for household size.

1.7 Data Sources

In preparing the Housing Element, various sources of information were utilized. The 2020 Census provided the basis for population characteristics. The Bureau of the Census also provides updated survey data through the American Community Survey (ACS) process, which is used to supplement Census data whenever possible. The following sources of data were used to help identify historic patterns of segregation, assess constraints to housing and the market conditions in Escalon, and to better identify specific housing needs:

- California Department of Education, California Assessment of Student Performance and Progress
- California Department of Education, California School Dashboard
- California Office for Environmental Health Hazard Assessment, CalEnviroScreen 4.0
- California Tax Credit Allocation Committee (TCAC) Opportunity Area Map and Scoring 2024
- City of Escalon Housing Element Annual Progress Reports 2015-2022
- City of Escalon Geographic Information System (GIS) mapping layers
- Freddie Mac Primary Mortgage Market Survey, 2013-2023
- Healthy Places Index

- San Joaquin Council of Governments, San Joaquin County Demographic and Employment Forecast, 2020
- San Joaquin Continuum of Care Point in Time Count Local Report
- San Joaquin Council of Governments Regional Housing Needs Allocation Plan
- State of California Department of Finance, E-1 City/County Population Estimates with Annual Percent Change, 2022-2023
- UC Berkeley Othering & Belonging Institute, Mapping Race in America
- UC Berkeley Urban Displacement Project Map, 2022
- University of Southern California, The Great California Shakeout
- U.S. Bureau of Labor Statistics, Quarterly Census of Employment and Wages (QCEW), Stockton-Lodi MPO, 2022 Q1 employment
- U.S. Census 2010 and 2020-2021 American Community Survey 5-Year Estimates
- U.S. Department of Agriculture, National Agricultural Statistics Service, Census of Agriculture, 2017
- U.S. Department of Housing and Urban Development, CHAS 5-Year Estimates
- Zillow.com, Land Cost and Median Rent data

1.8 Community Profile

The region where present-day Escalon is located is within the original lands of the Miwok and Yokuts indigenous peoples.

In the mid-1800s, Western expansion brought settlers to the area. Among them was John Wheeler Jones, an early inhabitant who acquired land and began planting grains and raising cattle in the area that would become Escalon. Railroad expansion attracted investment and migration of workers, spurring the first layout of the town in the late 1890s. Development soon accelerated and by the 1920s, Escalon was a modernizing community with paved roads, streetlights, public festivals, and storefront-lined streets. Escalon was incorporated as an independent city in 1957.

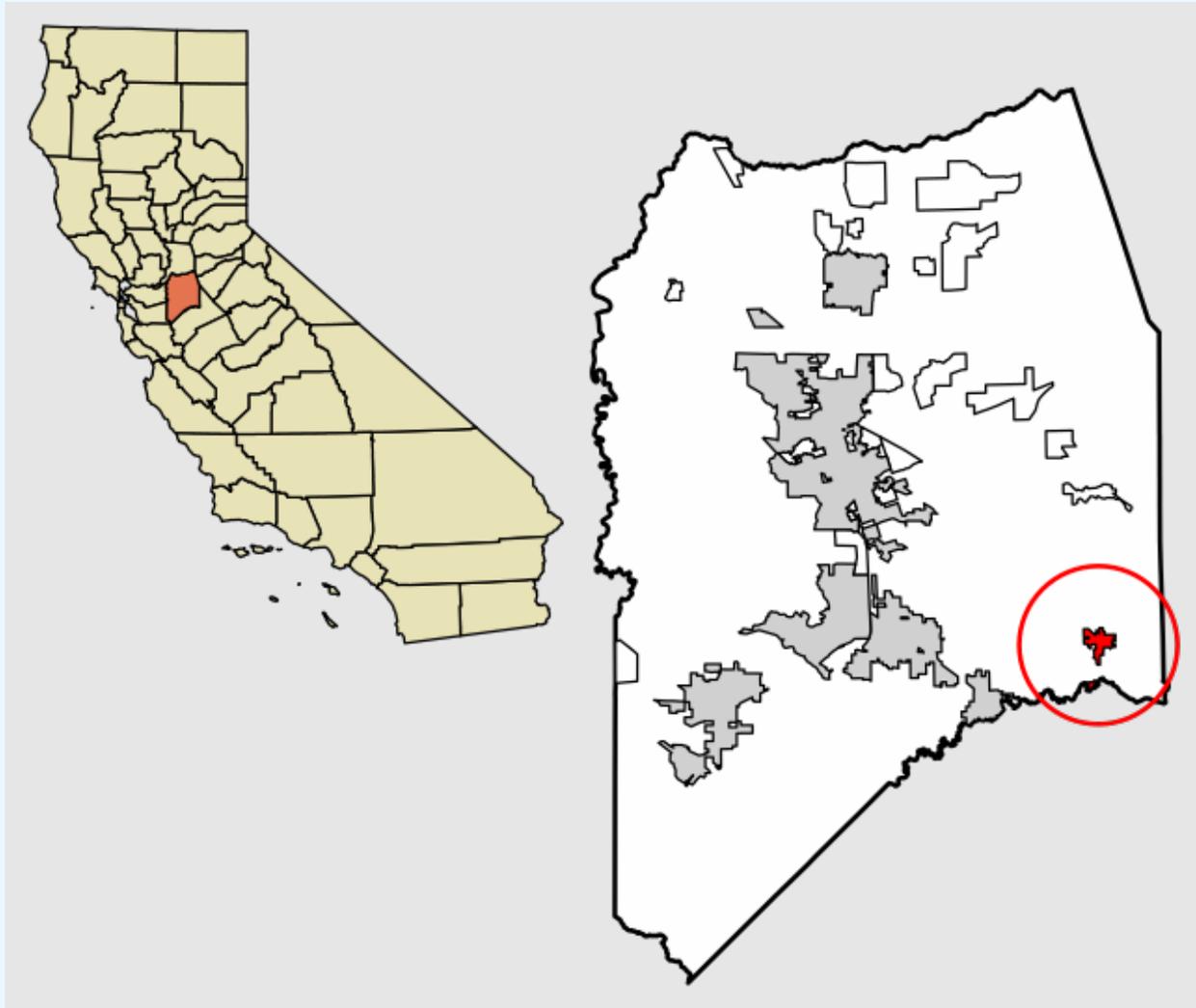
The City of Escalon is located in California's Central Valley within San Joaquin County, approximately nine miles north of Modesto and 22 miles southeast of Stockton. Set within scenic and fertile farmlands, the City is an agriculturally productive area of the San Joaquin Valley, supporting the local economy including approximately 7,300 residents within City limits. Escalon is a safe community with high-performing schools, quality residential homes, and a quaint, 1920's era downtown centered on historic Main Street. Community preservation is core to Escalon's local culture.

Escalon is in a highly accessible area of San Joaquin County serviced by many roadways. Highway 120 bifurcates the city, connecting Escalon to Manteca to the west and Oakdale to the east. Santa Fe Road connects Escalon to Riverbank in adjacent Stanislaus County, while Highway 108 connects Escalon to Modesto in the south and Farmington to the north.

The City of Escalon strives to provide a vibrant and diverse community that is welcoming to all. The City's mission statement, "Taking pride in our community through quality

service,” is apparent through its community preservation, maintenance of family atmosphere, and pursuit of a high quality of life.

Figure 1: City of Escalon Location within San Joaquin County



1.9 Changing Housing Needs and Demographics

As Escalon ages and demographics change, different housing needs have arisen, and new programs are needed to meet changing demands. This section explores the characteristics and housing needs of Escalon residents and helps to provide direction in updating the City’s Housing Element goals, policies, and programs.

Population Characteristics and Trends

Escalon’s population increased 25.07% percent between 2000 and 2021, from 5,963 to 7,458. In comparison, San Joaquin County’s population rose 38.26% percent during the general same period, from 563,598 in 2000 to 779,233 in 2020. As of 2023, the State

Department of Finance estimates that the population in Escalon slightly decreased to 7,264.

Age Composition

Escalon’s population is slightly younger than the region’s population. The median age in Escalon is 33.7 years old compared to 35.2 in San Joaquin County, and 37.9 years of age statewide. Nearly 44% of the population is under the age of 35, while 18% of the population is age 60 and above.

Race and Ethnicity

Census statistics include the race and ethnicity of a City’s population. The most prevalent racial and ethnic categories are as shown in Table 1 below. The 2021 population estimates show that Escalon’s largest population of White (Non-Hispanic) residents increased 8.11% from 4,953 in 2010 to 5,355 in 2021. Increases also occurred in the population of Native Hawaii or Other Pacific Islander, from 0 to 30. Notably, the population of the Two or More Races category rose by nearly 2,500% from 20 to 515 in this period. The City’s Hispanic or Latino residents decreased from 1,792 to 1,429 during this same period. The Asian population slightly decreased from 117 to 107. Escalon’s Black or African American population decreased from 61 in 2010 to 22 in 2021, while the Native American population fell from 111 to 0 during this same period. Additional discussion of Escalon’s racial and ethnic composition is included in Section 4.

Table 1: Population by Race/Ethnicity 2010-2021

Racial or Ethnic Group	2010	2021
Hispanic or Latino	1,792	1,429
White (Non-Hispanic) alone	4,953	5,355
Black or African American alone	61	22
Native American alone	111	0
Asian alone	117	107
Native Hawaiian or Other Pacific Islander alone	0	30
Some other race alone	0	0
Two or More Races	20	515

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates, 2010 and 2021

Employment and Income

According to the 2021 5-Year estimate American Community Survey, Escalon has 3,506 residents 16 years and older employed in the workforce. The top three industries with the highest percentage of employees are in Education, Health, and Social Services (21.3%), Retail trade (18.9%), and Manufacturing (12.4%). The vast majority of workers, 64.1%, are employed in the private sector, followed by 19.4% employed in public sector jobs.

Household Incomes and Housing Affordability

Escalon’s median household income was \$67,176 in 2021. This is significantly lower than the San Joaquin County median household income of \$86,056 and the statewide median household income of \$91,551. Comparatively, the household income of families, particularly married couples in Escalon, is substantially higher than the city, county, and state median. Since 2019, approximately 11% of Escalon households are considered Extremely Low-Income. The distribution of income by household type is shown in Table 2.

Table 2: Income Distribution by Household Type

Households	Income
Household Median Income	\$67,176
Families	\$95,825
Married-couple Families	\$103,588
Non-family Households	\$57,623
Source: U.S. Census Bureau, American Community 5-Year Estimates, 2021	

1.10 Special Needs Populations

Segments of the population may have more difficulty in finding decent, affordable housing due to their special needs. Special circumstances may be related to one’s employment and income, family characteristics, disability, and household characteristics, among other factors. Consequently, certain residents in Escalon may experience incidences of discrimination, housing access obstacles, or other housing problems.

Homelessness

Escalon’s most recent San Joaquin Continuum of Care (SJCoC) Point-in-Time (PIT) Count of homeless was conducted in 2019. That PIT Count reported four (4) transient persons experiencing homelessness in the City. A PIT Count was not conducted in Escalon in 2022 due to a drop in volunteers after COVID-19. Notwithstanding the lack of data, SJCoC estimates an increase in persons experiencing homelessness in the County.

Persons with Disabilities

The term “disabled” refers to a disability (physical, mental, developmental, or sensory), which prevents or precludes a person from doing their work either in or outside of the home. Individuals with disabilities are the most likely population to experience homelessness, be rent burdened or unable to afford housing, and face the highest rates of housing discrimination. The number of disabled persons in a community has important implication for providing certain social services, in the removal of barriers to facilities, and in developing housing which has specialized access for disabled residents.

Census data from the 2021 American Community Survey indicate that 7.8% of all residents in Escalon have a disability. Of the 578 persons with a disability, 313, or 54.15%, are 64 years old or younger. Escalon’s two most prevalent disabilities are residents with

cognitive difficulty (4.7%) and independent living difficulty (4%). Additional information on Persons with Disabilities is available in Section 5.

Seniors

Seniors often have fixed incomes and can have additional special needs related to access and care that may require physical improvements to their homes such as ramps, handrails, lower cupboards and counters, creation of a downstairs bedroom, or other modification to enable them to remain in their homes. They may also need assistance in the form of a part-time or live-in caretaker.

According to the 2021 American Community Survey, over 11% of Escalon’s population is aged 65 and above. While a majority of seniors in Escalon own their homes, 11.45% of residents aged 65 and older are renters.

Large Households

Household size is an important consideration when it comes to planning for housing. Household size can be influenced by a lack of affordable housing options, an increase or decrease in family formations, or families leaving an area. Ethnicity can also affect sizes of households if a particular ethnic group has a tradition of living with family members upon retirement age.

Escalon has 2,866 households. Among these, there are 240 large households (5 or more persons) and 92.5% of large households are renters. The average household size is 3.05 persons, compared to a higher household size of 3.76 persons in San Joaquin County.

Female-Headed Households

Female-headed households generally have lower incomes and higher living expenses and childcare costs making the search for affordable, decent and safe housing more difficult. The higher cost burdens for female-headed households increase housing insecurity.

In 2021, Escalon had 270 female-headed family households, or 9.4% of the total household population. Approximately 141 of the 270 female-headed family households are under the poverty level. Data from the same year show single female-headed households with no spouse earning a median annual household income of \$28,571, nearly 58% less than Escalon’s median income.

Farmworkers

Farmworkers play a key role in the operation and delivery of the state’s food system. Escalon is located in San Joaquin Valley, an area rich in agricultural production. Farms in the San Joaquin Valley produce milk, fruits, including grapes, cherries, and tomatoes, lettuce, a variety of nuts, such as almonds, walnuts, pistachios, cotton, alfalfa, and cattle. In 2021, 3.18% of Escalon residents were employed in the agriculture, forestry, fishing and hunting, and mining industry. At the County level, there are approximately 20,000 farmworkers, 40.5% of who are classified as permanent farmworkers working 150 days or more per year.

Given their precarious employment and low-income status, farmworkers encounter hardships finding affordable housing. As a result, many farmworkers live in overcrowded and substandard housing arrangements. This situation presents a need to provide safe and affordable housing for the farmworker community. A detailed analysis of farmworker households in the City is provided in Section 4.

1.11 Characteristics of Housing Stock

Type

The housing stock in Escalon is predominantly single-family residences, though the City maintains some multifamily housing including duplexes, 3-4 unit dwellings, 5+ unit dwellings, and mobile homes. Between 2010 and 2021, Escalon saw increases in the number of single-family residences and 3-4 unit dwellings. Duplexes, 5+ unit multifamily dwellings, and mobile homes decreased during the same period.

Tenure

Between 2010 and 2021, the number of homeowner households slightly decreased from 2,067 to 2,048. As of 2021, 71.4% of households in Escalon are homeowners. However, the proportion of homeownership decreased from 77.7% in 2010 and 74.9% in 2000. Since 2000, the number of renter households steadily increased from 514 to 818 in 2021. As homeownership affords long term stability and investment equity, owning a home is a way to achieve greater housing security in the City.

Age and Condition

Of Escalon's housing stock of 2,913 units, 2,619 units (89.88%) were built between 1940 and 2009. In the two-decade span of 2000 and 2019, 685 new homes were built, whereas only 5 new homes were built between 2020 and 2023.

Overcrowding

Residential overcrowding is determined by the number of persons per room. The Census defines overcrowding as more than 1 person occupying 1 room, excluding bathrooms, hallways, balconies, and porches. Severely overcrowded households are more than 1.51 persons per room.

Overcrowding results from many conditions, such as a lack of affordable housing, insufficient housing stock, and an increasing population. Overcrowding is influenced by demographic and socioeconomic factors such as race, class, and housing tenure. Older-adult immigrants, recent immigrants, low-income families, and renter-occupied households are more likely to experience overcrowding. Overcrowding can exacerbate the potential for contracting communicable diseases, suffering respiratory illnesses, and increased vulnerability to homelessness. According to the U.S. Census Bureau 2021 American Community Survey, there were 11 overcrowded households and zero severely overcrowded households in the City. The full analysis of overcrowding is included in Section 5.

Vacancy

In 2021, Escalon’s occupied housing units accounted for nearly 99% of the total, and the remaining 42 units were vacant. The unoccupied units were classified as “Rented, not occupied” in U.S. Census ACS, a category comprising vacant units rented but not yet occupied, including units where rent has been paid or agreed upon but renters have not moved in. A vacancy rate of less than 5% can indicate a shortage of available rental housing.

Prices

The median value of a home in Escalon rose from \$306,900 in 2010 to \$418,500 in 2021, a significant increase of 36.36%. During this same period, median gross rent dramatically rose 83.6% from \$709 to \$1,302. By comparison, there was a 22% increase in the median value of a home and a 37% increase in median gross rent in California, as well as a 21% increase in the median value of a home and a 34% increase in San Joaquin County between 2010 and 2021.

Cost burden, or the ratio of housing costs to household income, has increased in the last several years. A household is considered cost burdened if more than 30% of monthly income pays for housing. Severely cost-burdened households pay more than 50% of monthly income to housing costs. Data from 2019 shows 71% of all renter households and 22% of ownership households have experienced some level of cost burden.

1.12 Summary of Constraints

Constraints to affordable housing production are created by governmental, infrastructure, market, environmental, and social factors, among others. Constraints can be divided into two types: “Governmental constraints” are those created by federal, state, and local governments, whereas “Nongovernmental constraints” do not arise from government policy, regulation, program, or practice.

Governmental constraints result from land use controls including policies, regulations, zoning ordinances, and development standards; permit processing times; and taxes and fees. Escalon’s zoning regulations guide development by establishing rules, standards, design criteria, and permit types. Additionally, development fees are charged to cover the cost incurred for processing, evaluation, and enforcement of regulations. The City also collects a variety of development impact fees to mitigate impacts resulting from a project. Policies and programs are included in Section 2 to address governmental constraints analyzed in the Technical Background Report (Section 4) and identified by housing development stakeholders.

Nongovernmental constraints arise from a range of factors impacting housing affordability but are not directly connected to government actions. These include construction costs, including land prices, building materials, and labor; availability of mortgage financing; market conditions such as housing price, consumer preferences, demand, and competition; interest and capacity of developers; natural hazards and environmental conditions that impact housing availability and costs; and availability of infrastructure.

1.13 Summary of Fair Housing Analysis

Under State housing law, 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.” AFFH entails taking decisive actions to remove entrenched housing discrimination barriers and to locate housing so it is affordable and equitably accessible to populations in need.

In compliance with Housing Element law, the City must prepare a Fair Housing Assessment to identify factors that contribute to local fair housing issues and barriers and include meaningful actions within the City’s Housing Element Goals, Policies, and Programs to address those factors. The City must incorporate Fair Housing Assessment findings into the Housing Element’s Sites Inventory. To ensure meaningful public participation, outreach and engagements efforts for the Housing Element must also affirmatively further fair housing.

In addition to these factors, the Fair Housing Assessment addresses: Engagement, Enforcement and Outreach Capacity, Segregation and Integration Patterns and Trends, Disparities in Access to Opportunity, Disproportionate Housing Needs including Displacement, Areas of Concentrated Poverty and Affluence Across Racial and Ethnic Groups, Identification of Contributing Factors, Identification of Contributing Factors, and a Summary of Fair Housing Issues.

The City of Escalon commits to affirmatively further fair housing and incorporate the lens of fair housing and equity – racial, social, gender, and economic – throughout this Housing Element.

1.14 Regional Housing Needs Allocation

The Regional Housing Needs Allocation (RHNA) is a part of State Housing Element law that determines the projected and existing housing needs for each local jurisdiction in California. State housing law requires each jurisdiction’s Housing Element to demonstrate that the jurisdiction has sufficient land zoned for housing and plans to meet its RHNA, and that there are no unnecessary barriers to the housing approval process to meet the RHNA targets. The San Joaquin Council of Governments (SJCOG) conducts the RHNA process for jurisdictions in San Joaquin County every eight years as required by HCD.

For the 6th Cycle Housing Element period 2023 – 2031, Escalon has a RHNA of 367 units, divided among income groups as shown in Table 3:

Table 3: City of Escalon 2023-2031 RHNA

Type	RHNA Allocation 2023-2031
Very Low (< 50% of AMI)	90
Low (50-80% of AMI)	56
Moderate (80-120% of AMI)	66
Above Moderate (>120% of AMI)	155
Total	367
Source: San Joaquin Council of Governments RHNA Plan	

1.15 Escalon 5th Cycle Housing Element Review

Progress Implementing Programs

The City has made progress in implementing many of the programs in its 2019 Housing Element. Some programs have been amended and carried forward in the 2023 Housing Element. The programs have been enhanced to affirmatively further fair housing and zone for a variety of housing types. Additionally, changes have been made to programs to include more robust engagement efforts. Limited-term programs that have been completed, such as amendments to the Zoning Code, and are no longer applicable have not been carried forward. A more detailed analysis of the City’s implementation of the 2019 Housing Element programs and their status is included in Appendix A.

1.16 Policy Changes

The 2019 Housing Element contained six goals and twenty-six policies. The 2023 Housing Element Update restructures the goals and policies to maximize the City’s ability to implement the 2023 Housing Element and to meet changing needs of the community. Goals, policies, and implementation programs are included in Section 2.

SECTION 2: HOUSING STRATEGY

SECTION 2.1: INTRODUCTION

2.1.1 Background: Goals, Policies & Programs

The Housing Element provides an opportunity for jurisdictions to address housing issues more effectively. In accordance with state law, this Section contains the City's Housing Strategy for the 2023-2031 Housing Element planning period. The Housing Strategy is made up of goals, policies, and implementation programs. Goals establish the purpose, policies establish a guiding action and commitment, and programs establish specific actions, procedures, programs, or other techniques to carry out a policy. The expected unit-specific outcomes of programs are summarized as quantified objectives for the 2023-2031 Housing Element planning period in Table 4 below.

Housing Strategies must include the following components to ensure effective implementation:

- The geography (citywide, or regarding particular sites, neighborhoods, or Specific Plan areas) in which the implementation program will take place.
- A concise statement of specific City actions that will be taken to implement each program.
- The agency or department responsible for implementation.
- The funding source that will be used for implementation.
- A timeframe that indicates when each action is anticipated to be completed.
- A quantifiable objective to assess program success over the planning period.

The City's 2019 Housing Element contained six goals. These goals, policies, and implementing programs have been restructured to maximize the City's ability to implement its vision for the 2023 Housing Element. Additionally, programs implemented and not applicable for continuation since the last Housing Element in 2019 have been removed.

2.1.2 Community Input in Housing Policy Development

The Community Housing Needs & Opportunities Survey was circulated widely in digital and written formats, yielding just under 200 responses by the time of the Public Review Draft Housing Element. Responses with regard to production were most favorable to senior housing, accessory dwelling units, and missing middle housing, reflected in three respective housing programs under Goal 2: Facilitate Housing Development. Respondents also heavily favored neighborhood improvements, infrastructural considerations, and rehabilitation of the aging housing stock, reflected in programs throughout the Housing Strategy. A complete summary of community input is included in Appendix C.

2.1.3 Stakeholder Input in Housing Policy Development

The Housing Element strategy was crafted through consultation with a diverse group of local stakeholders, ensuring a comprehensive and inclusive approach.

Development professionals were asked to provide input on constraints to housing development in Escalon. Respondents noted that among the most prohibitive constraints were fees and exactions, zoning, processing and permitting procedures, availability of financing, availability of labor, costs (labor, materials, and land), and community opposition. Constraints are considered in full in Section 4 and are mitigated through program actions to reduce barriers and actively facilitate housing development.

Service providers were asked to provide input on contributing factors to fair housing issues in Escalon. As detailed in Section 5, a ranking of four to six core contributing factors with associated programmatic actions were selected from a broader list of 15 potential contributing factors among categories provided by the California Department of Housing & Community Development (HCD).

SECTION 2.2: GOALS & POLICIES

As mentioned above, the 2023 Cycle Housing Element restructures the Housing Goals, Policies, and Programs to maximize the City's ability to implement its vision for the 2023 Housing Element. The City's 2019 Housing Element contained six overarching goals:

- Goal 1: Preserve and Improve Escalon's Housing and Neighborhoods
- Goal 2: Facilitate and Encourage Development of Housing to Meet the City's Housing Needs
- Goal 3: Provide Adequate Sites for Housing
- Goal 4: Expand Housing Opportunities for the Elderly, Disabled Persons, Including Developmentally Disabled, Households with Extremely Low to Moderate Incomes and for Persons with Special Housing Needs
- Goal 5: Eliminate Housing Discrimination
- Goal 6: Encourage Energy Efficient Resources in New Residential Development as well as the Existing Housing Stock

The 2023 Housing Element includes the following five reconfigured goals:

- Goal 1: Provide Viable Sites for Housing
- Goal 2: Facilitate Housing Development
- Goal 3: Sustain & Improve Escalon's Housing and Neighborhoods
- Goal 4: Support Affordable & Accessible Housing
- Goal 5: Eliminate Housing Discrimination

Each of the five goals has corresponding policies, which are listed below. The strategic changes made to the policies and programs from the 2019 Housing Element are recorded as parenthetical notes and within individual program tables. See Section 2.3 for programs and implementation actions.

Goal 1: Provide Viable Sites for Housing

- **Policy 1A: Adequate Sites**
 - Maintain adequate sites, with appropriate General Plan and zoning designations and regulations, for new housing development for all economic sectors to support the Regional Housing Needs Allocation.
 - [Source: 2019 Escalon Housing Element, Policy 2A, 3A, and 3F, modified]
- **Policy 1B: Accessible Information**
 - Encourage the development of viable sites with adequate infrastructure by maintaining accessible and transparent information on the City's website.
 - [Source: 2019 Escalon Housing Element, Policy 1D, 2F, and 3B, modified]

Goal 2: Facilitate Housing Development

- **Policy 2A: Zoning for Housing Development**
 - Ensure that the City's zoning regulations are compliant with state law and do not form an unnecessary constraint to the development, conservation, and rehabilitation of housing.
 - [Source: 2019 Escalon Housing Element, Policy 2E, modified]
- **Policy 2B: Housing Variety**
 - Encourage the development of a mix of housing types to meet the diverse housing needs of Escalon residents, including special needs populations, through zoning and land use regulations, regional collaboration, and funding programs.
 - [New]

Goal 3: Sustain & Improve Escalon's Housing & Neighborhoods

- **Policy 3A: Facilities and Services**
 - Provide, maintain, and upgrade facilities and services in support of complete neighborhoods.
 - [Source: 2019 Escalon Housing Element, Policy 1A and 1C, modified]
- **Policy 3B: Neighborhood Preservation and Rehabilitation**
 - Implement methods to sustain neighborhoods, such as through public and private investments, preserving the existing housing stock, and conserving affordable housing supply.
 - [Source: 2019 Escalon Housing Element, Policy 1E and 1F, modified]
- **Policy 3C: Energy Conservation and Efficiency**
 - Encourage energy efficiency and energy conservation in residential development to ensure sustainable practices and to reduce housing costs.
 - [Source: 2019 Escalon Housing Element, Policy 6A, modified]

Goal 4: Support Affordable & Accessible Housing

- **Policy 4A: Removal of Constraints**
 - Ensure constraints that pose a barrier to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities, are addressed and removed where possible.
 - [Source: 2019 Escalon Housing Element, Policy 2E, modified]
- **Policy 4B: Housing for All**
 - Actively support the development of high-quality affordable and accessible housing opportunities that meet the needs of all residents, including special needs populations.
 - [Source: 2019 Escalon Housing Element, Policy 4A, modified]

Goal 5: Eliminate Housing Discrimination

- **Policy 5A: Prohibit Discrimination**
 - Support the strict observance and enforcement of anti-discrimination laws and practices including prohibiting discrimination in the sale or rental of housing with regard to race, color, national origin, ancestry, religion, disability, source of income, gender/gender identity, sexual orientation, marital status, and familial status.
 - [Source: 2019 Escalon Housing Element, Policy 5B, modified]
- **Policy 5B: Affirmatively Further Fair Housing**
 - Affirmatively further fair housing for all residents consistent with State and Federal law.
 - [New]

SECTION 2.3: HOUSING PROGRAMS

The City is committed to achieving the goals and policies outlined above through the implementation of the following programs and implementing actions by December 31, 2031. The effectiveness of the 22 housing implementation programs will be monitored, and adjustments will be made as deemed appropriate by the City in coordination with California Department of Housing & Community Development (HCD).

Program 1-1: Maintain Housing Capacity

The City will assess the effectiveness of Housing Element implementation on an annual basis and provide an opportunity for the public to learn about and provide feedback on the effectiveness of the housing programs.

- Action (A): Administer housing policy administration to support the implementation of the City’s Housing Element and timely achievement of program timeframes.
- Action (B): Assess the City’s progress towards Housing Element implementation and complete the Housing Element Annual Progress Report (APR).
- Action (C): Facilitate a public workshop to promote awareness of the progress made towards the implementation of the Housing Element programs.
- Action (D): Submit the APR to HCD.

Context	Continuing program, revised to fulfill RHNA and address State law. Previously “Adequate Lower Income Sites.” Incorporates Former Program 3-5 (Housing Element Monitoring Program).
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): Ongoing Action (B-D): Annually, prior to April 1.
Objective	Provide housing administration to meet the City’s Housing Element program deadlines and ensure no net loss of housing capacity throughout the planning period. Maintain access to key State housing, planning, and infrastructure funds.

Program 1-2: Maintain Viable Sites

The City will work to maintain viable sites to support development of housing at all income levels at or beyond RHNA throughout the eight-year planning cycle.

- Action (A): To ensure sufficient residential capacity is maintained to accommodate the RHNA for each income category, within one year of adoption of the Housing Element, develop and implement a formal, ongoing (project-by-project) evaluation procedure pursuant to Government Code section 65863. The evaluation procedure will track the number of extremely low-, very low-, low, moderate-, and above moderate-income units constructed to calculate the remaining unmet RHNA. The evaluation procedure will also track the number of units built on the identified sites to determine the remaining site capacity by income category and will be updated continuously as developments are approved.
- Action (B): Maintain an administrative list of feasible replacement sites in the event of redevelopment or other constraints posed to development of opportunity sites, to maintain no net loss of housing development capacity in the planning period.
- Action (C): Allow residential development as a by-right use on C-2 sites included in the City’s Housing Element Sites Inventory. All sites in inventory used to accommodate a portion of the lower-income RHNA will permit owner-occupied and rental multifamily uses by right pursuant to Government Code Section 65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households.
- Action (D): Develop an overlay zone to incentivize development of housing on land owned by religious institutions in support of the Housing Element Sites Inventory.
- Action (E): Post the housing sites inventory on the City’s website to further assist the development community in selecting potential development sites.
- Action (F): Review production of units within the City four years into the planning period and compare with Housing Element projections. If actual production is below the projected level, and the City is not meeting its RHNA targets proportional to the duration of the planning period (i.e., 50% of RHNA in each income category), implement an alternative action program aimed at meeting RHNA targets.

Context	Continuing program (includes previous Program 3-3: Encourage Mixed-Use and Residential Development in Commercial Areas), amended to address State law.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A-B): Annually, starting by March 31, 2024. Action (C-D): December 31, 2024 or December 31, 2026.*

	Action (E): Within one year of Housing Element certification. Action (F): February 29, 2028.
Objective	Maintain capacity to accommodate the RHNA by income group throughout the entire planning period.

** Program timing dependent on State certification date.*

Program 1-3: Accessible & Transparent Development Application Information and Standards

The City will increase accessibility and transparency of housing development standards and opportunities by publicizing opportunities for housing streamlining incentives and meet the new transparency and development fee requirements of AB 602 and SB 319 through the following actions:

- Action (A): Develop a formalized procedure and preliminary application for the SB 35 streamlining approval process and post materials on the City’s website.
- Action (B): Develop a supplemental application form for projects eligible under AB 2162, AB 2011, SB 6, SB 684, and SB 4, and post on the City’s website.
- Action (C): Develop a pre-application form and procedure, or adopt the Preliminary Application Form developed by HCD pursuant to SB 330, and post on City’s website.
- Action (D): Post all required information about development standards and fees on the City’s website along with relevant information on zoning, development standards, and affordable housing-related ordinances.
- Action (E): Ensure compliance with AB 602 requirements for new development impact fee studies and publicizing resulting fees.
- Action (F): Create and publish a summary that identifies the sites on the City’s Sites Inventory and make the summary available online in map format. Provide site-specific development information and support whenever possible to provide a clear development process for interested housing developers.

Context	New program to address State law.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A-F): May 1, 2025.
Objective	Maintain capacity to accommodate the RHNA by income group throughout the entire planning period.

Program 2-1: Zoning for a Variety of Housing Types

The City will update its Zoning Code to accommodate a variety of housing types and achieve consistency with State law through the following actions:

- Action (A): Allow Permanent Supportive Housing, as defined in Government Code Section 65650, to be a by-right use in all zones where multifamily and mixed-uses are permitted.
- Action (B): Allow Low Barrier Navigation Centers to be a by-right use in zones where multifamily and mixed-uses are permitted, including the nonresidential zones where multifamily is permitted.
- Action (C): Allow Employee Housing, consisting of no more than 36 beds in group quarters (or 12 units or less) designed for use by a single family or household to be treated as an agricultural use.
- Action (D): Allow JADUs within all single-family dwellings and ensure all ADU/JADU requirements are compliant with State law.
- Action (E): Allow Residential Care Facilities for 7 or more clients as a permitted use in residential zones, subject only to clear, transparent, objective standards.
- Action (F): Amend the City’s Zoning Code to permit manufactured homes in the same manner, in the same zones, and only subject to the same requirements as other single-family residential uses.
- Action (G): Include a broadened definition of family that provides Zoning Code occupancy standards specific to unrelated adults, compliant with fair housing law.

Context	Continuing program (includes previous Programs 1-1, 2-1, 2-2). Amended to address the following State laws: <ul style="list-style-type: none"> ▪ Action (A): California Government Code § 65650 ▪ Action (B): California Government Code § 65660 ▪ Action (C): California Health and Safety Code § 17021.6 ▪ Action (D): California Government Code § 65852.2 ▪ Action (E): California Health and Safety Code § 1566.3 ▪ Action (F): California Government Code § 65852.3 ▪ Action (G): California Government Code § 65583
Geography	Citywide
Responsibility	Development Services Department & Finance Department
Funding Source	General Fund
Timeframe	Action (A-F): December 31, 2024 or December 31, 2026.* Action (G): March 31, 2027.
Objective	Achieve consistency with State law.

** Program timing dependent on State certification date.*

Program 2-2: Senior Housing

The City will take an active role in supporting the housing needs of seniors.

- Action (A): Post and maintain an active list of housing resources for seniors, including but not limited to a list of senior and assisted living housing developments, home modifications to increase accessibility, and accessory dwelling units on the City’s website. Information regarding programs that aim to help seniors to age in place, such as In-Home Supportive Services, shall also be posted on the City’s website.
- Action (B): Meet with the Department of Aging and Community Services and local nonprofits biannually to foster a relationship that will help to connect seniors to available resources and programs.
- Action (C): In coordination with Action 2-1(E), develop objective standards for residential care facilities and assess opportunities for assisted living housing developments for seniors. Conduct outreach to at least three providers and support interested entities in accessing tax-exempt funding through the California Health Facilities Financing Authority.

Context	New program, responds to community input.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): Within 6 months of Housing Element adoption, ongoing thereafter. Action (B): Biannually Action (C): March 31, 2027.
Objective	Support new and existing senior housing development.

Program 2-3: Missing Middle Housing

The City will establish development standards to encourage the development of missing middle housing and multi-dwelling unit housing types on a lower-density neighborhood scale. Missing middle and multi-unit housing types include accessory dwelling units (separately covered in Program 2-4), duplexes, triplexes, fourplexes, townhomes, lot splits allowed under SB 9, and small lot subdivisions allowed under SB 684.

- Action (A): Streamline approval processes for development projects of 10 or fewer residential units on urban lots under 5 acres in accordance with SB 684.

- Action (B): Provide information on the City’s website about SB 9 (2021), which allows property owners to split a single-family lot into two lots and develop up to four dwelling units on most City lots.

Context	New program added to address State law and community input to facilitate development of housing comparable to single-family densities.
Geography	Citywide, in zones allowing housing.
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A-B): March 31, 2025.
Objective	Increase transparency for residential development project applicants and achieve consistency with State law.

Program 2-4: Accessory Dwelling Units

The City will implement a suite of actions to address State law and community input to increase the City’s production of accessory dwelling units (ADUs).

- Action (A): Evaluate applicable changes to ADU law and policy on an annual basis and report relevant changes to the Planning Commission & City Council as part of the APR, in conjunction with Program 1-1.
- Action (B): Establish a pre-approved ADU program per AB 1332 (2023).
- Action (C): Prepare a resolution to allow separate conveyance of accessory dwelling units (ADUs) as a condominium unit, as allowed by AB 1033 (2023), to incentivize the production of ADUs and entry-level homeownership opportunities.
- Action (D): Provide multilingual guidance and educational materials for building ADUs on the City’s website and meet with homeowner associations to inform them that covenants, conditions, and restrictions (CC&Rs) prohibiting ADUs are not permitted under State law.
- Action (E): To help ensure a balance of residential and commercial uses, consider amendments to the City’s Zoning Code to allow accessory commercial units (ACUs) in neighborhoods throughout Escalon, including allowances for selected commercial uses on corner lots in low-density mixed-use applications (i.e., small neighborhood retail uses like cafés, salons, and bookstores).

Context	New program to address State law and community input to facilitate integrated development and reduce vehicle miles traveled (VMT).
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Geography	Citywide, in zones allowing housing.
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): Annually, starting by March 31, 2024. Action (B): January 1, 2025. Action (C-D): March 31, 2027. Action (E): May 1, 2030.
Objective	Increase transparency for residential development project applicants and achieve consistency with State law.

Program 2-5: Affordable Housing Funding and Incentives

The City will continue to seek available local, state, and federal funding for affordable housing through the following actions:

- Action (A): Continue to actively pursue funding from state and federal programs such as CDBG, HOME, Low Income Housing Tax Credits, Multi-family Housing Program, the Joe Serna Jr. Farmworker Housing Grant Program, and CHFA on an ongoing basis for development of affordable lower income housing for seniors, families, farmworkers, and persons with disabilities, including persons with developmental disabilities. Support funding applications by developers when the proposed projects are consistent with the goals and policies of the City’s General Plan.
- Action (B): Establish a formal fee deferral program for residential development to encourage the development of low and very low-income housing projects and special needs housing projects. The program will be designed to ensure the fee deferral would make the development of the housing units economically feasible in cases where they would not otherwise be feasible. In conjunction with Program 1-3(D), ensure that all fees are made available on the City’s website.
- Action (C): Consider forming a joint powers authority (JPA) to house a regional housing trust fund with neighboring City, Town, County and/or Tribal agencies as provided under SB 20 of 2023.

Context	Continuing program, revised to fulfill RHNA and address State law. Incorporates Former Program 4.4 (Seek Available Funding).
Geography	Citywide
Responsibility	Development Services Department & Finance Department

Funding Source	General Fund, Grant Funding
Timeframe	Action (A): Annually, and as funding opportunities arise. Action (B-C): December 31, 2026.
Objective	Secure State and Federal funding to support the development of affordable housing.

Program 2-6: Farmworker Housing

The City will take an active role to ensure that farmworkers have access to adequate, safe, and affordable housing.

- Action (A): Continue to seek funding for farmworker housing through the Joe Serna Jr. Farmworker Housing Grant Program.
- Action (B): Reach out to agricultural employers operating in the region to identify site opportunities for the development of permanent housing for agricultural employees and their families, and to provide technical assistance throughout the application and entitlement process.
- Action (C): Meet with surrounding jurisdictions and local organizations to collaborate on the implementation of actions to support farmworker housing in the San Joaquin Valley.
- Action (D): Create a multilingual fact sheet on farmworker housing made available online and at City Hall.

Context	Continuing program, revised to fulfill RHNA and address State law. Incorporates Former Program 4.4 (Seek Available Funding).
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund, Grant Funding
Timeframe	Action (A-C): Ongoing, at least annually. Action (D): December 31, 2026.
Objective	Secure State and Federal funding to support the development of affordable housing for farmworkers and their families.

Program 3-1: Neighborhood Improvements

The City will continue to prioritize neighborhoods improvements in areas supporting new affordable housing development through the following actions:

- Action (A): As part of the annual review of the Capital Improvement Program (CIP), determine priorities for capital improvement projects required to maintain the community's aging or nonexistent infrastructure, particularly located in neighborhoods with aging housing stock and/or infrastructure, and Moderate Resource Areas. Review of the CIP shall also include verification that areas needing improvement are scheduled for funding to address these needs at a specific time in the future.
- Action (B): The City shall continue to prioritize lower-income housing development for water and sewer expansion, consistent with Government Code 65589.7 or its successor. Following adoption, the City will provide the Housing Element Update to the City's water and sewer providers (e.g., the water and sewer division of the Public Works Department).
- Action (C): To help ensure a balance of residential and commercial sites, consider amendments to the City's Zoning Code to allow accessory commercial units (ACUs) in neighborhoods throughout Escalon, including allowances for selected commercial uses on corner lots in mixed-use applications.

Context	Continuing program (includes previous programs 1-2, 2-1, 2-2). Incorporates former program 3-1: Provision of Public Services.
Geography	Citywide, emphasizing neighborhoods with aging housing stock and infrastructure.
Responsibility	Development Services Department & Public Works Department
Funding Source	General Fund
Timeframe	Action (A): Annually, with CIP update. Action (B): Within 60 days of Housing Element adoption. Action (C): May 1, 2030.
Objective	Support at least three capital improvement projects in areas of highest need and apply for CDBG funds to support infrastructure needs in a manner that affirmatively furthers fair housing at least twice throughout the planning period.

Program 3-2: Housing Rehabilitation Program

The City shall partner with the Housing Authority of the County of San Joaquin (HACCSJ) on housing rehabilitation programs for low-and moderate-income households, including the following actions:

- Action (A): Update and distribute information about HACCSJ's rehabilitation programs to individuals with disabilities, seniors and the elderly, and advocacy groups that represent these special needs groups.
- Action (B): Provide and maintain information on rehabilitation programs, including the HACCSJ rehabilitation program, on the City's website.
- Action (C): Pursue grant opportunities to create a residential rehabilitation program for lower income residents. Work with HACCSJ to apply for HOME, CalHome, and CDBG funds, as well as promote Section 504 Home Repair Program loans and grants to provide housing rehabilitation loans and weatherization services for income-eligible households to improve living conditions.

Context	Continuing program (Previously 1-3).
Geography	Citywide, with an emphasis on the City's older neighborhoods and Moderate Resource Areas.
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Ongoing at least annually, beginning by May 1, 2025.
Objective	The City strives to assist at least five households through housing rehabilitation programs described above.

Program 3-3: Conservation of Affordable Units & Mobile Homes

The City will continue to conserve the existing supply of subsidized and below-market-rate housing (including mobile homes) to ensure that affordability is preserved through an early warning system and timely application of state and federal grant funds for conservation.

- Action (A): Monitor the continued affordability of affordable housing projects in the City. The City will coordinate with developers, owners, and residents of the individual affordable housing projects within five years of deed-restriction expiration.
- Action (B): Maintain an updated inventory of mobile home parks that identifies the number of units by bedroom size and tenure.

- Action (C): Educate residents and park owners to facilitate resident purchase of mobile home parks with information on funding sources such as HCD’s Mobile Home Park Rehabilitation and Resident Ownership Program (MPRROP).
- Action (D): Prepare a Mobile Home Park Conversion Ordinance, which prohibits the conversion of a mobile home park (manufactured homes on permanent foundations) to another use unless certain findings are made including that:
 - The conversion will not result in the displacement of lower- or moderate-income residents or of senior citizens who cannot afford rents charged in other parks within Escalon and San Joaquin County;
 - The age, type, size, and style of mobile homes to be displaced will be able to be relocated into other comparable mobile home parks within the city of Escalon or San Joaquin County or that the applicant has agreed to purchase any mobile home that cannot be relocated;
 - Any mobile home residents displaced as a result of the conversion shall be compensated by the applicant for all reasonable costs incurred as a result of their relocation; and that
 - The relocation and purchase assistance plan mitigates the impacts of the displacement of individuals or households for a reasonable transition period and mitigates the impacts of any long-term displacement.

Context	Continuing program (Previously 1-4), revised to include provisions for mobile home parks.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): Ongoing. Action (B): March 31, 2026. Action (C-D): May 1, 2027.
Objective	Preserve deed-restricted and naturally-occurring affordable housing within Escalon.

Program 3-4: Energy Conservation and Efficiency

Energy conservation in housing not only saves tenants and homeowners money but also contributes to a more sustainable future. To promote energy conservation in housing, the City will develop informational materials to provide to the public. The City will continue to promote ways to reduce monthly home water bills.

- Action (A): Continue to require new houses to utilize low-flow toilets, low-flow shower heads, and low flow faucets consistent with the requirements of the San Joaquin County Water Resources Unit. Support new water retrofitting programs undertaken by the San Joaquin County Water Resources Unit, such as providing free low-flow plumbing fixtures to existing customers in Escalon.
- Action (B): Continue to require the use of drought-tolerant landscaping within new developments during the entitlement review process (as specified in the State Model Landscape Ordinance).
- Action (C): Develop bilingual (English and Spanish) utility bill inserts that encourage the use of energy-efficiency programs and energy conservation methods.
- Action (D): Develop a bilingual brochure (English and Spanish) with information energy conservation programs, including programs available through the County, State, and PG&E, and make available online and at City Hall.

Context	Continuing program (Previously 6-1).
Geography	Citywide
Responsibility	Development Services Department & Public Works Department
Funding Source	General Fund
Timeframe	Action (A-B): Ongoing Action (C): Biannually Action (D): December 31, 2025.
Objective	Promote energy and water conservation, with a target of reducing residential water use by 10% and increasing the use of energy conservation programs by 15%.

Program 4-1: Removal of Constraints

Continue to analyze the Zoning Ordinance, Escalon Municipal Code, and City procedures to ensure that existing policy and amendments do not constrain development through the following actions:

- Action (A): Monitor applicable provisions of the Housing Accountability Act (HAA) as amended, including but not limited to the City’s Growth Management Ordinance.
- Action (B): Conduct surveys of developers at least twice during the planning period to identify constraints to development, with consideration of any identified code changes implemented within a year from the end of the survey.

Context	Continuing program (previously 4-1), amended to address State law.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): Through the SB 330 sunset date of January 1, 2030. Action (B): At least twice in cycle, beginning by May 31, 2025.
Objective	Eliminate constraints to fulfilling the City’s RHNA and quantified objectives.

Program 4-2: Housing Outreach and Stakeholder Engagement

Encourage development of affordable and multifamily housing, including housing for special needs and/or extremely low, very low, and/or low-income households through the following outreach actions:

- Action (A): Develop and distribute a survey that seeks feedback from developers on the effectiveness of the incentives created through the Housing Element.
- Action (B): Invite non-profit housing providers in the Escalon housing market to meet with City staff to promote the use of incentives available and encourage projects incorporating affordable residential units. Provide information and technical assistance to property owners and developers.
- Action (C): Partner with housing developers to pursue funding opportunities at the regional, state, and federal levels to create housing for extremely low-income households and those with special needs.
- Action (D): Develop a marketing package to raise awareness of the newly formed incentives and post to the City’s website, make available to City Hall, and send to housing developers, real estate professionals, property owners, and local organizations.
- Action (E): Conduct outreach to religious institution stakeholders (including but not limited to churches, gurdwaras, mosques, synagogues, and temples) in the greater Escalon area to circulate SB 4 information in conjunction with Program Action 1-3(B).

Context	Continuing program (previously titled “Outreach to Developers of Affordable and Special Needs Housing”).
Geography	Regional, including housing developers active in San Joaquin and Stanislaus Counties.

Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): Annually, beginning January 2025. Action (B): Biannually Action (C): Ongoing Action (D-E): June 30, 2025, update as needed.
Objective	Monitor the effectiveness of programs, procedures, and other incentives and secure funding for housing development.

Program 4-3: Parking Reductions for Eligible Projects

The City will continue to implement a program to administer parking reductions for eligible projects in consistency with State law, and in support of development on smaller sites through the following actions:

- Action (A): Continue density bonus provisions in consistency with State law.
- Action (B): Amend the City’s Zoning Code to adjust the minimum parking requirements for all multifamily projects and comply with the management standards for emergency shelters pursuant to state law (AB 139).
- Action (C): Evaluate the Municipal Code and amend to require bike/scooter parking in eligible developments.
- Action (D): Evaluate the Municipal Code and amend to ensure no parking requirements beyond State law for ADUs, JADUs, remodels, and additions.
- Action (E): Amend the Municipal Code to allow separate rental or sale of parking spaces and residential units, also known as unbundled parking.
- Action (F): Present a recommended ordinance regarding shared parking between commercial and residential uses in the C-2 zone district to incentivize the active use of downtown commercial lots and retain a mix of uses in the City’s commercial areas.

Context	Continuing program (previously Program 4-6) revised to address State law: <ul style="list-style-type: none"> ▪ Action (A-B): California Government Code § 65915 ▪ Action (B): AB 139 ▪ Action (C): SB 712 (2023). ▪ Action (D): State ADU law including AB 1308 (2023). ▪ Action (E): AB 1317 (2023).
Geography	Citywide

Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A-B): June 30, 2024. Action (C-E): December 31, 2024. Action (F): December 31, 2027.
Objective	Incentivize a mix of residential and commercial development.

Program 5-1: Equal Housing Opportunity

The City shall take measures to distribute information regarding fair housing rights, programs, and complaint procedures through the following actions:

- Action (A): Refer all complaints of housing discrimination to the San Joaquin Fair Housing Association, or other organization with commensurate purpose, for action. The Planning Department will continue to be responsible for receiving complaints in regard to housing.
- Action (B): Continue to provide an informational outreach program, including handouts regarding fair housing law and tenant rights.
- Action (C): Establish administrative practice responding to landlord complaints that are received from tenants, including potential discrimination issues and concerns. The City’s Building Inspector will meet on site with concerned tenants to hear the complaint and concerns, identify any issues related to building code or housing occupancy standards and those regarding landlord/tenant relations or lease agreements. The concerns/issues are directed to the appropriate authority including the Housing Authority of San Joaquin County, San Joaquin Fair Housing Association, and/or Development Services Manager for further discussion and evaluation. The City anticipates utilizing this process for 1-2 such complaints per year, or 10-12 times throughout the planning period. The intent of the program is to ensure that discrimination issues are proactively addressed to prevent displacement and that the City’s trust relationship with the community is maintained.

Context	Continuing program (previously Program 5-1), revised to affirmatively further fair housing.
Geography	Citywide
Responsibility	Development Services Department, overseeing Code Enforcement Division and Building Division
Funding Source	General Fund

Timeframe	Action (A), (C): Ongoing Action (B): Check counter weekly to ensure fair housing materials are available to the public and update information that is available on an annual basis upon changes to fair housing law, beginning by March 31, 2025.
Objective	City involvement in every case that comes forward, ensuring that grievances are addressed, and all aspects of the law are enforced.

Program 5-2: Removal of Impediments to Fair Housing

The City will continue to connect individuals and households to resources available to them to meet the need for immediate shelter and other essential services and support.

- Action (A): Post information about the Housing Choice Voucher (HCV) Program on the City’s website including income eligibility, landlord resources, program fraud hotline, HCV Family Self-Sufficient Program, and a link to the HCV application hosted by the Housing Authority of the County of San Joaquin. The information will also be made available in Spanish.
- Action (B): Create or source a tenant and landlord rights toolkit in collaboration with housing advocacy groups and/or regional agencies. The toolkit will include information about the identification of fraud related to mortgages, lending and foreclosure, evictions, discrimination, harassment, reasonable accommodations, housing conditions and repairs, filing a complaint, legal entry, security deposits, and reporting violations. The toolkit shall be made available both on the City’s website and at City Hall in both English and Spanish. The toolkit will also be made available at the Housing Resource Fair detailed in Action (D).
- Action (C): Conduct outreach to educate the residential areas with Covenants, Conditions, and Restrictions (CC&Rs) on State law and ensure compliance with fair housing laws.
- Action (D): Host or participate on a regional basis in a Housing Resource Fair at least twice throughout the planning cycle to share information about affordable housing, tenant and landlord rights, first-time homebuyer education, City programs, and energy conservation. The City will invite partner organizations and service providers to attend and share information with attendees. Interpretation and translation services will be made available to ensure that all information developed and disseminated is made available to individuals with limited English proficiency. The City will, at a minimum, publicize the Housing Resource Fair one month in advance of the event via social media and the City’s website.
- Action (E): Require bilingual (English/Spanish) availability of rental agreements in developments constructed with City assistance.

- Action (F): Partner with fair housing service providers, faith-based institutions, Escalon Unified School District, community-based organizations, and local newsletters or message boards to ensure fair housing information and resources reach linguistically isolated and underserved populations.
- Action (G): Refer all fair housing complaints to service providers including California Rural Legal Assistance.
- Action (H): Partner with the Central Valley Association of REALTORS® to educate residents about first-time homebuyer assistance programs, ADU programs and opportunities, and overall education.
- Action (I): Continue to provide information sheets at City Hall about the 211-phone system and post a link to the City’s website that guides users to the 211 San Joaquin County website.

Context	Continuing program revised to affirmatively further fair housing. Action (H): AB 1524, AB 721.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): June 30, 2024, update as needed. Action (B): March 31, 2025. Action (C-D): At least twice in cycle, beginning by May 31, 2025. Action (E): July 1, 2025. Action (F-I): Ongoing
Objective	Educate renters, homeowners, and landlords on fair housing laws and resources available to promote increased housing stability, fair housing practices, and affirmatively further fair housing.

Program 5-3: Anti-Displacement Actions

Lower and moderate-income renters are at increased risk of displacement. The City shall take measures to reduce the risk of displacement through the City, especially in areas of increased investment and development, through the following actions:

- Action (A): The City will require replacement housing units, pursuant to the requirements in Government Code § 65915(c)(3), when any new development occurs on a site in the Sites Inventory if that site meets any of the following conditions: 1) currently has residential uses or within the past five years has had residential uses that have been vacated or demolished; or 2) subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower- or very low-income; or 3) subject to any form of rent or price control through a public entity’s valid exercise of its police power; or 4) occupied

by lower- or very low-income households. The City will conduct outreach to residents of 100% of nonvacant sites within the City’s Sites Inventory that may be replaced by new construction within 90 days of permit application on any given site(s).

- Action (B): Post a bilingual (Spanish/English) fact sheet regarding the Tenant Relocation Assistance and any text amendments on the housing webpage of the City’s website.
- Action (C): Assess options upon sunset of the Tenant Protection Act for eligibility of local provisions within the purview of State law. If deemed necessary, amend the Municipal Code to add commitments for Tenant Relocation Assistance that provides enhanced relocation payments at or beyond the requirements of CA Civil Code 1946.2 to Escalon tenants earning low or moderate incomes evicted for no-fault just cause.
- Action (D): Maintain an active rehabilitation program by applying for the use of federal and state programs to assist lower-income homeowners and renters in the maintenance and rehabilitation of their properties.

Context	New program added to affirmatively further fair housing. Incorporates previous program Replacement of Affordable Units.
Geography	Citywide, including affordable housing developments.
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): March 30, 2025. Outreach within 90 days of applicable project application submittal. Action (B): Within 3 months of adopting ordinance of Action (A). Action (C): January 1, 2030 – December 31, 2031. Action (D): Ongoing
Objective	Maintain and rehabilitate two single-family residences and 14 trailers of the existing housing stock found to be in need of rehabilitation, require code compliance for safer rental units, prevent displacement, monitor the affordability of 42 affordable units, and ensure tenants are paid relocation payments for no-fault just cause throughout the duration of the planning cycle.

Program 5-4: Housing Choice Vouchers

The Housing Choice Voucher Program (Section 8) is a federal subsidy program that helps families afford market-rate, private rental housing. Furthermore, landlords housing

Section 8 tenants benefit from federally guaranteed rental income. Under State law (SB 329 and SB 222), landlords in California are legally required to accept rental applications from applicants using Section 8 and VASH vouchers and other forms of rental assistance.

- Action (A): The City will continue to require developers utilizing tax-exempt financing to include language in agreements with the City permitting persons and households eligible for HUD Section 8 rental assistance. The City will support opportunities for tenant-based Housing Choice Voucher holders to access market-rate units.
- Action (B): The City will monitor the status of the Section 8 waiting list on a quarterly basis and issue a citywide notification via the City’s mailing list upon periodic opening of the waiting list, with a goal of reaching 100% of qualifying households.
- Action (C): Assist the Housing Authority in holding annual informational meetings and discussions with property owners and managers of single-family and multi-family rentals to expand the number of developments that accept HCV program tenants. In these efforts, the City will assist the Housing Authority in ensuring outreach efforts reach Escalon property owners.

Context	New program added to affirmatively further fair housing.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Action (A): Ongoing Action (B): Quarterly, beginning March 31, 2024. Action (C): Annually
Objective	Increase the number of property owner/landlord that accept HCV in higher resource areas by 25% and reach 100% of qualifying households to support housing mobility for lower-income and special needs households.

Program 5-5: Reasonable Accommodation

Continue to ensure that reasonable accommodation is provided for persons with disabilities, including developmental disabilities, through the following actions:

- Action (A): Ensure that requests for reasonable accommodation are over the counter, fast, and free. Conduct a biannual (every two years) administrative review of the City’s regulations, procedures, and processes to ensure that reasonable accommodation is provided for disabled persons.

- Action (B): If barriers to reasonable accommodation are identified, undertake appropriate revisions to address the issue within six months, or prioritize as funding allows. If no reasonable accommodation requests are made in any given two-year period, include a statement of program availability in the City’s newsletter and proactive outreach in coordination with local disability rights stakeholders.

Context	New program added to affirmatively further fair housing.
Geography	Citywide
Responsibility	Development Services Department
Funding Source	General Fund
Timeframe	Biannual review first conducted by April 1, 2025.
Objective	Address all requests for reasonable accommodation and biannually review the procedure to ensure that it does not pose a constraint to housing for persons with disabilities.

Program 5-6: Limit Code Enforcement Activities

Continue to prioritize residential code enforcement activities for situations that pose an immediate threat to public health and safety, such as housing that qualifies as a substandard building under Health and Safety Code 17920.3. Such activities do not include minor alterations made to residences without benefit of permit when such alterations are made to accommodate a special need or disability of the resident(s), or for interior alterations made to allow or honor the residents’ cultural needs or practices, unless those alterations pose an immediate threat to the safety of the residents or neighborhood. In instances of health and safety requiring significant repair, connect residents and property owners with rehabilitation programs and legal assistance. Ensure that code enforcement representatives receive training for cultural sensitivity and allow adequate capacity for services to be conducted.

Context	New program added to affirmatively further fair housing.
Geography	Citywide
Responsibility	Development Services Department, Code Enforcement Division
Funding Source	General Fund
Timeframe	Ongoing
Objective	Affirmatively further fair housing.

SECTION 2.4: QUANTIFIED OBJECTIVES

Table 4 below summarizes Escalon’s quantified housing objectives for the 2023-2031 Housing Element planning period.

Table 4: Quantified Objectives, City of Escalon, 2023-2031

Program Types	Extremely Low-Income	Very Low-Income	Low-Income	Moderate-Income	Above-Moderate Income
New Construction	50	50	95	95	250
Rehabilitation	1	1	1	1	0
Conversion	0	0	0	0	0
ADUs/JADUs	2	2	4	4	5
Total	53	53	100	100	255

SECTION 3: HOUSING SITES

SECTION 3.1: CONTEXT

Under Government Code § 65583(a)(3) the City must identify suitable adequate sites with capacity to fulfill its fair share of the regional housing need, as determined by San Joaquin Council of Governments' Regional Housing Need Allocation (RHNA). These sites can include vacant sites zoned for residential use, vacant sites that allow residential development, and underutilized sites that are capable of being redeveloped to increase the number of residential units. These sites must have the realistic potential for new residential development within the eight-year Housing Element planning period. Planned, approved, and pending residential projects may receive credit towards the City's RHNA, along with the projected development of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs). This section will focus on the inventorying and analyzing of potential opportunity sites and the evaluation of pending, approved, and permitted projects sites to ensure the City is conforming to the Affirmatively Furthering Fair Housing (AFFH) requirements and furthering AFFH objectives.

Escalon has a total RHNA of 367 units, divided among the income categories as follows:

Table 5: Escalon Regional Housing Needs Allocation (RHNA), 2023-2031

Jurisdiction	Very Low Income (<50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate (>120%)	Total
Escalon	90	56	66	155	367

Source: San Joaquin Council of Governments Regional Housing Needs Allocation Plan

Escalon is meeting its RHNA through planned, approved, and pending projects projected to develop during the planning period, sites identified in the Housing Sites Inventory, and ADU development projections.

Assembly Bill 1397 and Senate Bill 166 ("No Net Loss" law), introduced stricter guidelines for the Sites Inventory in the Housing Element. To comply with these requirements, the Housing Element incorporates various strategies and programs, ensuring realistic assumptions for affordability and capacity.

SECTION 3.2: DEVELOPMENT CAPACITY ASSUMPTIONS

Pursuant to Government Code § 65583.1 and 65583.2(a), the City is including planned, approved, and pending projects projected to develop during the planning period, as well as ADU development projections towards their RHNA. Overall, the City is projected to develop 106 units, including ADUs, over the planning period. Housing sites and programs have been included to meet the City's remaining RHNA, as well as comply with No Net Loss requirements.

3.2.1 Accessory Dwelling Units

An Accessory Dwelling Unit (ADU) is a secondary dwelling unit located on residentially zoned property that has an existing single-family or multifamily residence. ADUs and JADUs can provide affordable housing options for special needs populations such as large households, seniors, female-headed households, individuals with a disability, and farmworkers, as well as students, in-home health care providers. ADUs have a few variations, including:

- Detached: The unit is separated from the primary structure.
- Attached: The unit is attached to the primary structure.
- Converted Existing Space: Space (e.g., master bedroom, attached garage, storage area, or similar use, or an accessory structure) on the lot of the primary residence that is converted into an independent living unit.
- JADU: A specific type of conversion of existing space that is contained entirely within an existing or proposed single-family residence.

Recent legislation has been passed to facilitate the development of ADUs as one of many efforts to address the severe housing crisis in California. ADU law establishes a statutory minimum requirement. Local governments may elect to go beyond this statutory minimum and further the creation of ADUs. Section 4 of the Housing Element contains an analysis of ADU regulations in Escalon and Section 2 contains programs to further incentivize the development of ADUs.

The projection of ADU and JADU development is based on realistic capacity and development trends of ADUs and JADUs in the previous planning period. As shown in Table 6, the City averaged 1.2 ADUs per year between 2018 and 2022.

Although Escalon is not located in the Association of Bay Area Governments (ABAG) region, the regional analysis of ADU affordability conducted by ABAG served as a resource in the determination of assumed affordability levels in the Housing Element since a similar study has not been conducted in the San Joaquin Valley. The ABAG ADU affordability analysis indicates assumed affordability levels of 30% of ADUs to very low-income households, 30% to low-income households, 30% to moderate-income households, and 10% to above-moderate-income households.

Table 6: ADU Permits Issued or Completed by Year in Escalon

Year	ADU/JADUs Permitted
2018	0
2019	1
2020	2
2021	2
2022	1
Total	6
Assumptions	Average of 1.2 ADUs per year 10 in planning cycle
Source: Escalon Annual Progress Report	

As a next step, the following local affordability analysis was considered. Based on the 2022 AMI for San Joaquin County, low-income households of three could afford a monthly rent of \$1,490, a low-income household of two could afford a monthly rent of \$1,325, and a low-income household of one could afford a monthly rent of \$1,159. According to the U.S. Census Bureau American Community Survey, the median gross rent in Escalon is \$1,302.

Similar to the ABAG study, the City of Stockton’s ADU affordability analysis assumes 60% of its anticipated ADU production will be affordable to lower-income households, 30% will be available to moderate-income households, and 10% will be available to above-moderate households. As depicted in Table 8, Escalon is counting a total of 131 units towards its RHNA across various income categories. After considering the projected development of ADUs and the capacity of planned, approved, and pending residential projects, there are not sufficient units to accommodate the City’s RHNA. As such, identification of viable sites to accommodate the City’s remaining RHNA is required (see Section 3.3).

Table 8As shown in Table 8, 10 ADUs are projected to be built during the planning period. The City anticipates that six (6) will be available to low-income households, three (3) will be for moderate-income households, and one (1) will be for an above-moderate income household.

3.2.2 Planned, Approved, and Pending Projects

As previously discussed, state law allows jurisdictions to count planned, approved, and pending residential projects as credits towards their RHNA. As shown in Table 7, 121 housing units are planned, approved, or pending. Descriptions of these projects are included below.

Table 7: Planned, Approved, and Pending Projects for RHNA Credit

Project	LI	MI	AMI	Total Units	Status	Antic. Occupancy
Murphy Ranch	-	-	75	75	Planned	2026
706 California Street	-	-	10	10	Planned	2026
2304 Jackson Avenue	-	-	18	18	Planned	2025
Countrywood Cottages	18	-	-	18	Planned	2025
RHNA Credit	18	0	103	121		

Murphy Ranch

Murphy Ranch is a 75-unit subdivision that is currently planned at the southeast corner of CA-120 and Brennan Avenue.

706 California St.

706 California Street is a planned residential development located at the northeast corner of California Street and Irwin Avenue. The proposed project is comprised of a five-lot subdivision to facilitate the development of five duplexes (10 units total).

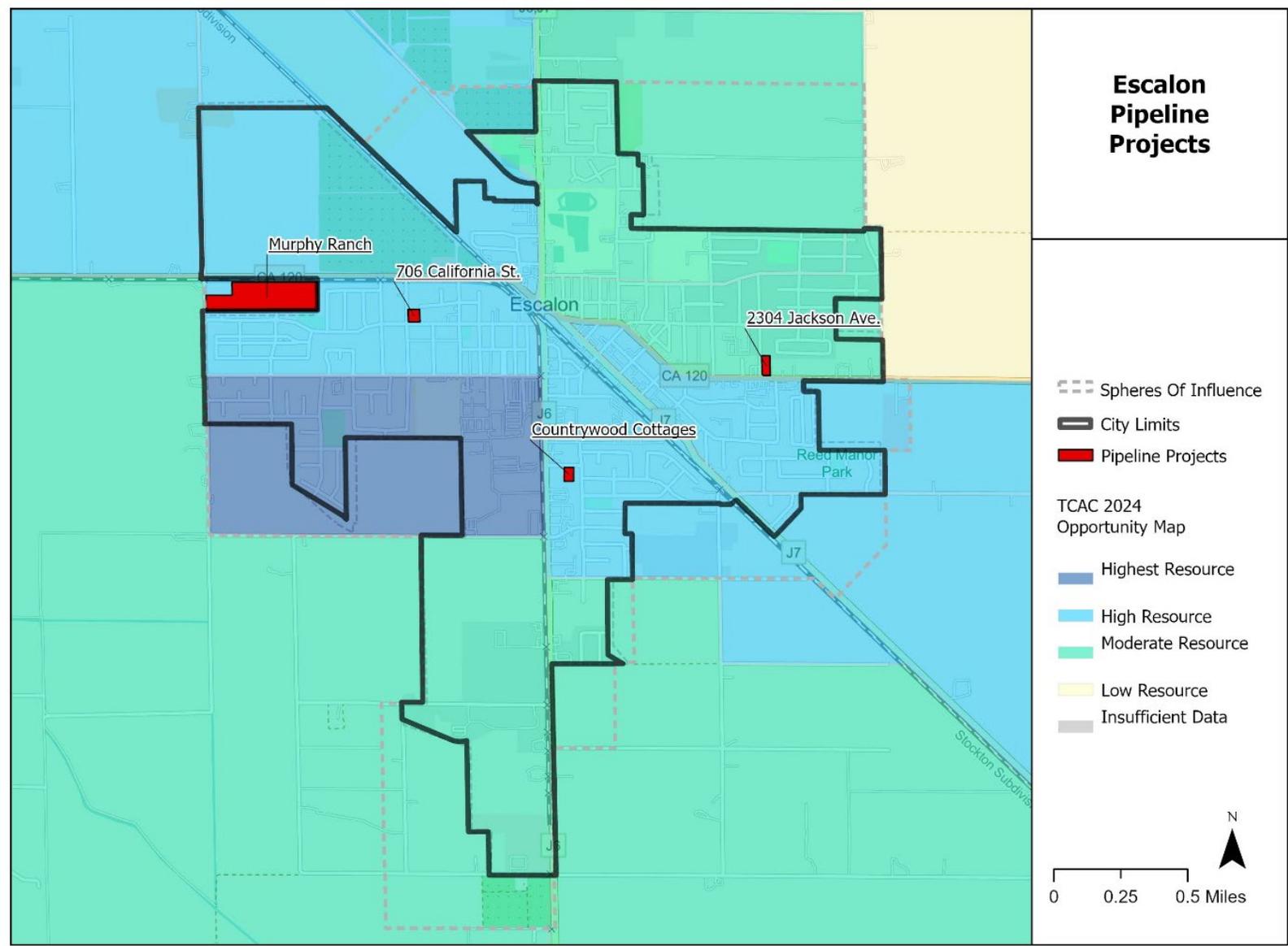
2304 Jackson Avenue

2304 Jackson Avenue is a planned 18-unit residential development that includes the development of two (2) commercial units on a parcel zoned C-2. The project is anticipated to go to the Planning Commission for approval in Spring 2024.

Countrywood Cottages

Countrywood Cottages is an 18-unit affordable multi-family residential development for seniors planned at Countrywood Lane near the intersection of Countrywood and McHenry Avenue. The development is proposed to be built on a 0.76-acre site in the C-2 zoning district at a density of 23.7 dwelling units per acre and will be going before the Planning Commission in early Spring 2024.

Figure 2: Location of Planned, Approved, and Pending Projects



3.2.3 Units Credited Toward RHNA

As depicted in Table 8, Escalon is counting a total of 131 units towards its RHNA across various income categories. After considering the projected development of ADUs and the capacity of planned, approved, and pending residential projects, there are not sufficient units to accommodate the City’s RHNA. As such, identification of viable sites to accommodate the City’s remaining RHNA is required (see Section 3.3).

Table 8: RHNA Credits

		Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation		146	66	155	367
RHNA Allocation with 30% Buffer		189	85	201	475
RHNA Credits	Pipeline	18	0	103	121
	ADUs/JADUs	6	3	1	10
	Total	24	3	104	131
RHNA % Fulfilled by Credits		16%	5%	67%	36%
RHNA Shortfall after Credits		122	63	51	236
RHNA Shortfall with 30% Buffer after Credits		165	82	97	344

SECTION 3.3: REALISTIC CAPACITY OF SITES ZONED FOR HOUSING

Government Code section 65583.2(a) stipulates that a jurisdiction must identify, as part of an inventory, sites within its boundaries that could have the potential for new residential development within the housing element planning period. Sites are generally grouped by type, including vacant sites zoned for residential use, vacant sites zoned for nonresidential use that allow residential development, and non-vacant sites, including underutilized sites, that can be developed for residential use. This section describes the general characteristics of the sites included in the 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.

3.3.1 Vacant Sites

A total of nine (9) vacant sites with are identified in the inventory to accommodate the City’s RHNA (Table 12). The methodology used to determine the realistic capacity of the sites identified in Table 9, can be found in Section 3.3.3 and Section 3.3.4.

Table 9: Realistic Capacity of Vacant Parcels

Site #	Site Address	APN	Zone	General Plan	Acreage	Realistic Capacity
1	1124 E California St	225-100-08	R-3	High Density Residential	1.37	20
2	1090 E California St	225-100-10	R-3	High Density Residential	1.18	17
3	1034 E California St	225-100-16	R-3	High Density Residential	0.87	13
4	1112 First St	225-126-13	R-3	High Density Residential	0.37	5
5	3100 S McHenry Ave	247-150-71	C-2	Commercial	1.02	13
6	3200 S McHenry Ave	247-150-72	C-2	Commercial	0.96	12
7	S McHenry Ave	247-150-73	C-2	Commercial	3.15	40
8	1310 Irwin Ave	225-070-20	R-2	Medium Density Residential	2.37	23
9	1780 Autumnwood Ct	227-650-16	R-1	Low Density Residential	0.53	1
	<i>Total</i>					144

Escalon’s vacant sites are substantially equipped and available for housing development, with some of the City’s vacant and non-vacant sites currently active on the market.

One commercial site included within the inventory (Site #7) held land use approvals for commercial development that have since expired. C-2 sites allow more dwelling units per acre than the default density for sites to realistically accommodate affordable housing development, and likely provide residential development opportunity comparable to or exceeding the opportunity posed by commercial development.

As noted in Figure 3, the sites inventory contains just one non-vacant site (Site #10), occupied only by a red-tagged home and in prime condition for redevelopment.

Figure 3: Housing Opportunity Sites in Escalon



Sites #1-3

Three separate adjacent parcels located on East California Street comprise Sites #1-3.

Zoning/General Plan	R-3 – High Density Residential
Acreage	1.37 acres (#1), 1.18 acres (#2), 0.87 acres (#3)
Capacity	20 units (#1), 17 units (#2), 13 units (#3)
RHNA Level	Above Moderate (Market-Rate) & Moderate
TCAC Resource Area	Moderate Resource Area

Figure 4: Escalon Housing Opportunity Sites #1-3



Site #4

Site #4 is a 0.37-acre parcel located at 1112 First Street.

<i>Zoning/General Plan</i>	R-3 – High Density Residential
<i>Acreage</i>	0.37 acres
<i>Capacity</i>	5 units
<i>RHNA Level</i>	Above Moderate (Market-Rate)
<i>TCAC Resource Area</i>	High Resource Area

Figure 5: Escalon Housing Opportunity Site #4



Sites #5-7

Three adjacent parcels along South McHenry Avenue make up Sites #5-7. The sites are 0.92, 1.06, and 3.15 acres in respective size.

Commercial development was previously approved on Site 7, but approvals have since expired. Several parcels are listed for sale as of December 2023.

<i>Zoning/General Plan</i>	C-2 – Commercial
<i>Acreage</i>	0.92 acres (#5), 1.06 acres (#6), 3.15 acres (#7)
<i>Capacity</i>	13 units (#5), 12 units (#6), 40 units (#7)
<i>RHNA Level</i>	Moderate (#5-6), Lower (#7)
<i>TCAC Resource Area</i>	Moderate Resource Area

Figure 6: Escalon Housing Opportunity Sites #5-7



Site #8

Site #8 is a 2.37-acre parcel located at 1310 Irwin Avenue. The site is abutted by State Highway 120 to the north, Irwin Avenue to the west, and the current terminus of Rosina Street to the south.

<i>Zoning/General Plan</i>	R-2 – Medium-Density Residential
<i>Acreage</i>	2.37 acres
<i>Capacity</i>	23 units
<i>RHNA Level</i>	Above Moderate (Market-Rate) & Moderate
<i>TCAC Resource Area</i>	High Resource Area

Figure 7: Escalon Housing Opportunity Site #8



Site #9

Site #9 is a 0.53-acre parcel located at 1780 Autumnwood Court. The parcel is included in inventory as an opportunity site for a low-density, market-rate housing development.

<i>Zoning/General Plan</i>	R-1 – Low-Density Residential
<i>Acreage</i>	0.53 acres
<i>Capacity</i>	1 unit
<i>Income Level</i>	Above Moderate (Market-Rate)
<i>TCAC Area</i>	High Resource Area

Figure 8: Escalon Housing Opportunity Site #9



3.3.2 Non-Vacant Sites

Four (4) non-vacant/underutilized sites are included in the Sites Inventory and are identified in Table 10.

Table 10: Realistic Capacity of Non-Vacant Parcels

Site#	Site Address	APN	Zone	General Plan	Total Acreage	Realistic Capacity
10	1260 Lillian Ave	225-140-25	C-2	Commercial	1.68	21
	<i>Total</i>					21

Site #10 is an underutilized parcel located on the northeast corner of Lillian and Plaza Avenues that can accommodate 21 above-moderate income units. The property is zoned C-2 and contains one red-tagged residential home. As of December 2023, the property is listed for sale. Recent development trends indicate that there is a desire to develop residential uses on properties zoned C-2. Additional information regarding recent development trends can be found in Section 3.3.3.

Figure 9: Escalon Housing Opportunity Site #10



3.3.3 Religious Institution Sites

Sites #11-13 are religious institutions parcels that have realistic development potential and are suitable to count towards the City’s lower income RHNA due to the passage of Senate Bill 4 (SB 4). SB 4, also known as the Affordable Housing on Faith and Higher Education Lands Act of 2023, introduces streamlined approval processes for housing development projects on lands owned by religious institutions or higher education institutions. The bill establishes specific criteria and requirements allowing for the development of housing units for lower-income households, as defined by Section 50079.5 of the Health and Safety Code. Up to 20 percent of the total units in the development may be for moderate-income households, as defined in Section 50053 of the Health and Safety Code. Additionally, SB 4 stipulates that the development project shall be allowed by right at a density deemed appropriate to accommodate housing for lower income households identified in subparagraph (B) of paragraph (3) of subdivision (c) of Section 65583.2 and a height of one story above the maximum height otherwise applicable to the parcel. If greater residential density or building heights are allowed on an adjacent parcel, the greater density or building height shall apply.

Government Code section 65583.2, subdivision (c)(3)(B), allows local governments to utilize “default” density standards that are “deemed appropriate to accommodate housing for lower income households.” In Escalon, the default density is 20 dwelling units per acre. Additionally, SB 4 projects are eligible for a density bonus, incentives, concessions, waivers or reductions of development standards and parking ratios, pursuant to Section 65915. Although Sites #11-13 are non-vacant, the realistic development capacity was calculated using only vacant portions of the properties and default density. Furthermore, pursuant to SB 4, the development of Sites #11-13 with affordable housing does not require a conditional use permit, planned unit development permit, or other discretionary local government review; therefore, no rezoning is required.

Table 11: Realistic Capacity of Religious Institution Parcels

Site#	Site Address	APN	Zone	General Plan	Total Ac	Developable Ac	Realistic Capacity
11	1511 Catherine Way	247-150-43	C-2	Commercial	4.33	2.95	59
12	1155 Escalon Avenue	225-020-18	R-2	Medium Density Residential	14.52	10	220
13	2149 Jackson Ave	227-260-27	C-2	Commercial	1.17	0.62	12
	<i>Total</i>						291

Site #11

Site #11 is a 2.98-acre parcel located south of Catherine Way, east of McHenry Avenue. The site is predominantly surrounded by residential uses, with one commercial development located to the west of the site. The site is currently developed with a parking lot and a church on approximately 1.38-acres of the parcel. The remaining 2.95-acre portion of the parcel can accommodate 47 lower-income and 12 moderate-income units.

Figure 10: Escalon Housing Opportunity Site #11



Site #12

Site #12 is a 14.52-acre parcel located to the west of Escalon Avenue, south of Arthur Road. The site is developed with a parking lot and a church on approximately on a 3.59-acre portion of the site, fronting Escalon Avenue. Approximately 10.93 acres are undeveloped. Ten acres of developable land have been included in the Sites Inventory of the 10.93 acres available due to site specification (i.e., setbacks and egress) and can accommodate 176 lower-income and 44 moderate-income units.

Figure 11: Escalon Housing Opportunity Site #12



3.3.3 Sites Suitability Analysis

Summary of Site Suitability

The identified sites have realistic development potential and are suitable to count towards the City's RHNA. The City can accommodate 16% of its lower-income RHNA with pipeline projects and ADU projections. Pending projects with identified lower-income capacity are likely to develop during the planning period, as discussed in Section 3.2.2, and the lower- and moderate-income units in those projects will be made affordable to the identified income groups through a deed restriction as required by the City's Inclusionary Housing Ordinance. Additionally, six (6) ADUs are assumed to be affordable to moderate-income units based on the affordability analysis outlined in Section 3.2.1. The remaining RHNA is accommodated through vacant and non-vacant sites, 176 of which are located on sites designated for residential use.

All identified sites have adequate infrastructure access. Sites that have been used in previous planning periods to accommodate lower income RHNA are subject to a program to allow by-right development at a minimum of 20 units per acre if 20% of the site's units are affordable (Program 1-2). Vacant sites, pipeline projects, and ADU projects are anticipated to accommodate over half of the City's lower income RHNA. The remaining lower income RHNA is accommodated by the religious institution sites and are deemed highly suitable for the development of both lower- and moderate-income housing following the legislative advancement of Senate Bill 4, bolstered by the programs described in Section 2.

Additionally, the Department of Housing and Community Development has determined that parcels intended for building units aimed at lower-income households should range between 0.5-acre and 10 acres. Parcels smaller than 0.5-acre, even if zoned for high densities, might not facilitate the necessary scale of development crucial for accessing competitive funding resources that support affordable housing projects. Conversely, financing lower-income housing developments might be challenging for projects on parcels exceeding 10 acres. The sites identified in the Sites Inventory that accommodate the City's lower-income RHNA are larger than 0.5-acre and smaller than 10 acres with the exception of Site #12. Although Site #12 is larger than 10 acres, the developable acreage meets the criteria and has been included in the Sites Inventory.

Four sites included in the Sites Inventory allow for non-residential uses. Development trends indicate that parcels zoned C-2 have an 85% likelihood of residential development. Since 2019, seven projects located on parcels zoned C-2 have been proposed in Escalon. Of the seven projects, six have developed with residential units as part of the proposed project.

3.3.4 Realistic Capacity Analysis

Government Code Section 65583.2(c) requires, as part of the analysis of viable sites, that the projected residential development capacity of the sites identified in this section be calculated to demonstrate that the sites can realistically be achieved. Minimum densities were utilized to determine the realistic capacity of the sites identified to accommodate the City’s remaining RHNA after the consideration of RHNA credits and affordability levels were determined using Chapter 17.50 of the Escalon Municipal Code, which outlines the City’s inclusionary zoning requirements. The Sites Inventory includes parcels in four zoning districts that allow a variety of residential uses at the following density standards:

- The Low Density Residential District (R-1): minimum of two dwelling units per acre and maximum of six dwelling units per acre.
- The Medium Density Residential District (R-2): minimum of 10 dwelling units per acre and maximum of 15 dwelling units per acre.
- The Multiple-Family Residential District (R-3): minimum of 15 dwelling units per acre and maximum of 29 dwelling units per acre.
- The Community Commercial District (C-2): standards in the R-3 zone apply (minimum of 15 dwelling units per acre and maximum of 29 dwelling units per acre).

Additionally, as described in Section 3.3.2, the realistic capacity for the nonvacant religious institution sites was calculated using only vacant and underutilized portions of the properties at default density of 20 dwelling units per acre.

Table 12: RHNA and Adequate Sites

	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA	146	66	155	367
Pipeline Projects	18	0	103	121
ADU Projections	6	3	1	10
Vacant Sites	40	31	73	144
Non-Vacant Sites	-	2	19	21
Religious Institutions	233	58	-	291
<i>Total Units in Sites Inventory</i>	<i>297</i>	<i>94</i>	<i>196</i>	<i>587</i>
RHNA Surplus	(151)	(28)	(41)	(220)

SECTION 3.4: PROGRAMS TO ENSURE ADEQUATE SITES

3.4.1 Summary of Programs to Ensure Adequate Sites

Escalon's five Housing Goals contain a suite of policies and programs to ensure that the City can fulfill and maintain its RHNA over the eight-year planning period.

Specific program actions to support residential uses include:

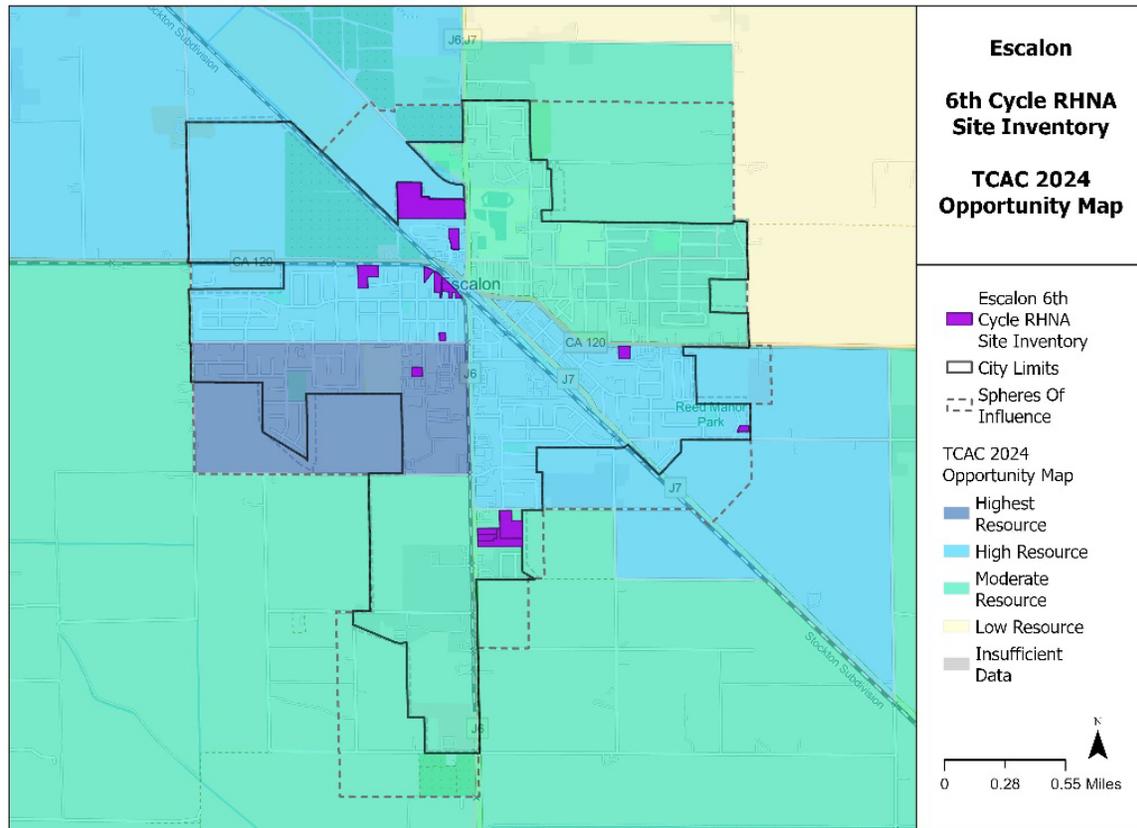
- Program 1-2: Maintain Viable Sites
- Program 1-3: Accessible, Transparent Development Application Information and Standards
- Program 2-1: Zoning for a Variety of Housing Types
- Program 2-5: Affordable Housing Funding and Incentives
- Program 3-1: Neighborhood Improvements
- Program 4-4: Parking Reductions for Eligible Projects

SECTION 3.5: FAIR HOUSING CONSIDERATIONS

3.5.1 Relationship of Sites to Fair Housing Analysis

Housing sites identified to meet Escalon’s RHNA are distributed throughout the community in a manner that affirmatively furthers fair housing. A full analysis of inventory sites compared to components of the Fair Housing Assessment is included in Section 5.

Figure 13: Distribution of Housing Sites in Escalon



3.5.2 Improved and Exacerbated Conditions

The identified housing sites are spread throughout the City and sites with capacity for lower-income housing are not concentrated in areas with a high concentration of existing affordable housing. Escalon’s sites are primarily located within High and Highest Resource Areas, higher than the most neighboring jurisdictions in San Joaquin and Stanislaus Counties.

Fair housing conditions are not exacerbated by the housing development anticipated within the 2023 Housing Element.

SECTION 3.6: INFRASTRUCTURE CONSIDERATIONS

Escalon has adequate water, sewer, and dry utilities infrastructure to accommodate the development of its RHNA. The capacity of infrastructure is summarized below and the sources of information can be found in Section 1.

3.6.1 Water

The City of Escalon serves as the water utility provider for all residents. The City is exploring a surface water project with South San Joaquin Irrigation District (SSJID) through the South County Water Supply Project (SCWSP) and has four groundwater wells to supply potable water to its residents. The City has developed a scheduled improvement program that prompts necessary improvements to ensure water supply and system capacity are in alignment with future buildout.

3.6.2 Sewer

The City owns and operates two wastewater treatment and disposal systems. The City uses a secondary oxidation system (aerated lagoons) to treat wastewater. The sewer service area encompasses approximately 1130 acres of land with the majority (42%) of the land use in the low to high density residential area. When a new development triggers the expansion of the sewer systems, the new development must extend the sewer system and "oversize" the facility to accommodate future flows within or beyond the development.

3.6.3 Storm Drainage

The City of Escalon's storm drainage system depends on SSJID's existing system of irrigation laterals to transport storm drain runoff from the City. Escalon's stormwater mostly discharges to lateral B, which goes to Lone Tree Creek, French Camp Slough, and the San Joaquin River. There are ten storm drainage sheds throughout the City, each containing a storm drain system that collects runoff from within the drainage shed and transports the flows to a City-maintained storm drain basin. Runoff is temporarily stored in the basins and then pumped into the SSJID laterals at the reduced flow rate. Escalon follows the Post-Construction Plan and Best Management Practices that was established to guide project proponents and plan checkers on how to meet the State Water Board's requirements for mitigating the negative impact of increases in storm water runoff caused by new development and redevelopment.

3.6.4 Other Utilities

Electricity and natural gas are provided by Pacific Gas and Electric Company (PG&E). SSJID has been actively working to replace PG&E electrical service. SSJID continues to invest in updated financial feasibility studies to ensure that they are able to deliver reliable electric service and at lower rates.

The City's solid waste is serviced by Gilton Solid Waste Management, a private company providing services to the City since 1974. Services include curbside waste and compost. AT&T, Spectrum and Viasat Internet are top contenders among internet service providers, offering affordable internet plans and providing services to most residents.

SECTION 3.7: ENVIRONMENTAL CONSIDERATIONS

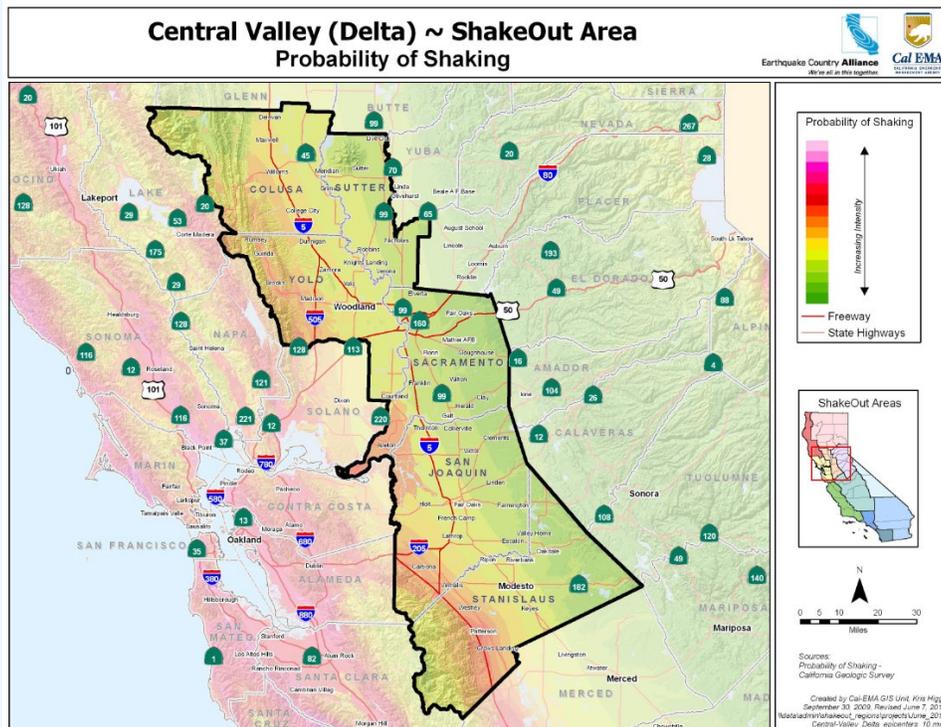
3.7.1 Fire

There are no historic records of wildfire events near Escalon since the 1980's. A minor wildfire risk is projected over the next 30 years. This is based on the level of risk the properties face rather than the proportion of properties with risk. The City of Escalon is already investing in wildfire control projects to minimize the wildfire risks.

3.7.2 Earthquake

Escalon 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, Escalon has a high earthquake risk. According to the USGS database, there is a 66% chance of a major earthquake within 50km of Escalon within the next 50 years.

Figure 14: Earthquake Shaking Probability Map



Source: University of Southern California (USC), *The Great California Shakeout*

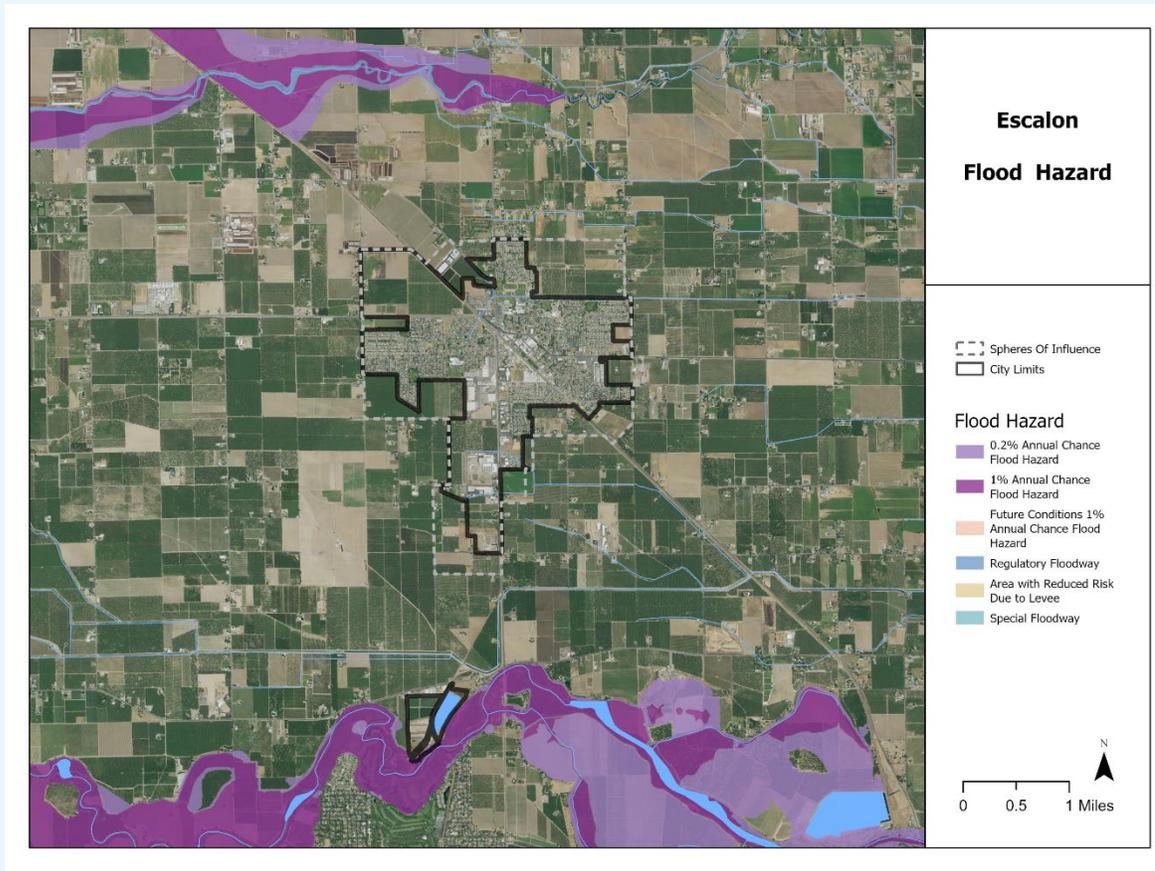
3.7.3 Flood

The greatest external risk to flooding is the Stanislaus River but the distance from the river and the topography (sloping toward the River) benefits the City and decreases major flooding problems. According to FEMA flood maps, the City is not situated in the 100- or even 200-year flood zone. Escalon has a moderate flooding risk over the next 30 years.

This is based on the level of risk the properties face rather than the proportion of properties with risk.

Development consistent with the City's Building Code and adopted Storm Drainage Master Plan will minimize risks associated with geological and flooding hazards and allow development of property consistent with uses and densities allowed in the Zoning Code.

Figure 15: Escalon Flooding Risk Factor Map



Source: National Flood Hazard Layer – Federal Emergency Management Agency

3.7.4 Landslides

Escalon is essentially flat, with a maximum elevation change of 33 feet and an average elevation above sea level of 115 feet. Within ten miles of the City limits, the land is also flat. There are no landslide events recorded to date in the City and neighboring cities. It is much less likely that the City will be impacted by landslide hazard due to its flat topography.

CONCLUSION

Section 3 concludes the policy document of the Housing Element. The core of the Housing Element includes Section 1 (Introduction), Section 2 (Housing Strategy), and Section 3 (Housing Sites).

The supplemental sections of the Housing Element address technical research requirements to support the Housing Element policy document:

- Section 4 (Technical Background Report) analyzes Housing Needs, Resources, and Constraints.
- Section 5 (Fair Housing Assessment) analyzes fair housing conditions and Affirmatively Furthering Fair Housing (AFFH).
- Appendices provide background context on sites, community engagement, and program implementation.

The City of Escalon is well positioned to successfully implement the policies, programs, and actions of this Housing Element. The 2023 Housing Element serves the housing needs of the next eight years for current and future residents and fulfills the statutory requirements of the State of California.

The Housing Element demonstrates that the City has the housing sites and planned projects needed to address and surpass its Regional Housing Needs Allocation. Moreover, the selected sites are integrated throughout the City in consideration of existing and enhanced fair housing requirements. Programs have been identified to mitigate constraints to the production of housing, and to ensure that Escalon can continue to be an affordable and vibrant community for a wide variety of residents in the years to come.